WASHINGTON COUNTY
OREGON

Washington County Language Access Framework 2026

Under the direction of the Office of Access and Opportunity

Washington County Administrative Office

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Certification of the Language Access Framework

Certification and Signature Page

Washington County, Oregon

Framework Period: 09/30/2026 – 09/30/2028

Date of Certification: 09/30/2026

As the County Administrator of Washington County, Oregon, I hereby certify the following:

Our Commitment to Language Access:

Washington County reaffirms its unwavering commitment to ensuring meaningful access to County programs, services, and activities for individuals with limited English proficiency (LEP) and individuals with disabilities requiring effective communication. Under federal and state law, including but not limited to Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, applicable federal grant assurances, and Oregon state requirements, the County shall not deny, delay, or make less effective any service, program, or activity because an individual requires language assistance or effective communication.

The Purpose and Scope of This Framework:

This Countywide Language Access Framework serves as the overarching Language Access Plan for Washington County, establishing the minimum standards, roles, procedures, and accountability expectations for language access across the County. It directs each County department to develop and maintain a Department Language Access Plan that adheres to this Framework and describes how these standards are implemented within its specific programs, services, facilities, communications, and community interactions.

Ongoing Nature of This Commitment:

Washington County's obligations under this Framework remain grounded in Title VI, Title II of the ADA, federal grant assurances, State of Oregon requirements, and County policy, and continue to require that all residents receive meaningful access to County programs, services, and activities regardless of the language they speak or their disability status.

Implementation and Monitoring Commitment:

Washington County Commits to implementing and monitoring the standards outlined in this Framework. The County will:

- Vest the Office of Access and Opportunity (OAO) with authority to require each department to develop, submit, and maintain a Department Language Access Plan aligned with this Framework.
- Require each department to review and revise its Language Access Plan on a biannual basis, or more frequently as needed, to adapt to changing community demographics and needs.
- Provide periodic updates to the Board of County Commissioners and other stakeholders on Framework implementation and compliance.
- Incorporate feedback mechanisms, including community consultation, for continuous improvement of language access services.

Transparency and Public Access:

This framework will be posted on the County's internal and external websites and is available to the public upon request. It is treated as an official document guiding the County's language access practices, aligning with the County's public service values and its commitment to serving all residents fairly.

Accuracy of Information:

I certify that that the standards, procedures, and information presented in this Framework are accurate and complete to the best of my knowledge and ability and reflect Washington County's current obligations under applicable civil rights law as of the date of certification.

Authorized By

Name:

Title: County Administrator

Date:

Tanya Ange

Digitally signed by Tanya Ange
Date: 2026.09.30 14:16:44 -07'00'

Framework Prepared By

Prepared by: Adrian Luis Manriquez, Alicia Sojourner, and Willy Risco

Titles: Civil Rights Officer, Director of the Office of Access and Opportunity, Program Coordinator

Department: County Administrative Office, Office of Access and Opportunity

Date of Completion: 09/24/2026

Contact for More Information

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Civil Rights Foundation

This Countywide Language Access Framework establishes the minimum standards, roles, procedures, and accountability expectations for Washington County. Each department must develop a Department Language Access Plan that describes how these standards will be implemented within its specific programs, services, facilities, communications, and community interactions.

Washington County is the most racially/ethnically diverse county in Oregon (U.S. Census Bureau, 2024). One in every four residents of Washington County speaks a language other than English at home (U.S. Census Bureau, 2026). Meaningful access entails language assistance that results in accurate, timely, and effective communication at no cost to an individual needing such support.

Language access is a civil rights obligation under Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, and national origin in programs and activities receiving federal assistance, and Title II of the Americans with Disabilities Act (ADA), which requires effective communication with individuals with disabilities, including those who are deaf, hard of hearing, blind, or visually impaired. The County must not deny, delay, or make services less effective because an individual requires language assistance. While federal guidance on language access implementation may change, Washington County's obligations to individuals with LEP remain grounded in Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, federal grant assurances, State of Oregon requirements, and County policy. These Obligations are not contingent on federal policy direction and continue to require that all residents receive meaningful access to County programs, services, and activities regardless of the language they speak.

This document sets minimum countywide standards for language access that apply to all Washington County departments. To ensure that the County is in compliance with applicable laws and policies, the Washington County Administrator has vested authority in OAO to require each department to create a Department Language Access Plan that aligns with this framework. OAO developed this Countywide Language Access Framework to provide guidance for all departments in Washington County to adjust and develop their own Language Access Plan that suits their unique departmental needs. Under guidance of the Washington County Civil Rights Officer and OAO, each department will create an internal committee to develop its individual LAP and submit draft plans to its leadership for approval and implementation. The plan should then be reviewed and revised biannually to adapt to changing community demographics and needs.

Section 1: How to Use This Framework

This Countywide Language Access Framework is a living policy document that establishes minimum standards, roles, and accountability expectations for language access across all Washington County departments. It is designed to be used alongside each department's individual Language Access Plan, which translates these countywide standards into department-specific implementation. To help departments navigate this document and prioritize their efforts, the following breakdown distinguishes what is required of all departments, additional requirements as applicable, and what tools are available to support implementation.

Required for All Departments

The following are mandatory for every Washington County department regardless of its size, service population, or LEP encounter frequency:

- Designate a Language Access Lead and notify OAO of the appointment
- Develop and maintain a Department Language Access Plan aligned with this Framework
- Complete a vital document inventory and ensure all vital documents are translated into Safe Harbor languages
- Ensure all staff complete required language access training at the appropriate level
- Use OAO-approved vendors for all interpretation and translation needs
- Include OAO-approved language blocks in all applicable public-facing materials
- Implement the complaint referral process and ensure staff know how to connect community members to OAO for civil rights complaints
- Track and report language service usage to OAO
- Maintain emergency communication procedures that include language access provisions

Required When Applicable

The following are required when a department's services, facilities, or community interactions make them relevant:

- ***Facility signage and wayfinding in Safe Harbor languages* –** required for any department with public-facing physical service locations
- ***Multilingual outreach materials* –** required when conducting community outreach or public engagement targeting LEP populations
- ***Professionally translated webpages* –** required for webpages containing vital information
- ***Interpretation for public meetings* –** required when LEP community members are expected to participate or when a meeting affects their rights or access to services
- ***Rare-language plans* –** required when a department regularly serves individuals whose language does not appear on the Safe Harbor list

- ***ASL and CDI coordination –*** required whenever a deaf or hard of hearing community member requests communication access
- ***Department-specific community consultation –*** required as part of the annual Language Access Plan review cycle and whenever significant program changes affect LEP populations

Recommended Tools

The following tools are available to support implementation and are strongly encouraged, and in certain instances their use is mandated:

- Interpretation and Translation Decision Guides
- Pre-translation and signage checklists
- Department LAP template
- Vital document inventory template
- Emergency communication checklist
- Language block library
- iSpeak cards and language identification tools
- Vendor instructions and billing guidance
- Annual reporting template
- Training checklist
- Glossary of key terms

The majority of these tools are available in the appendices of this document and on the Language Access page on Horizons.

Implementation Timeline

The following timeline applies to all departments upon adoption of this Framework. Departments that have already completed certain requirements prior to adoption should document that completion and notify OAO accordingly:

Within 30 Days of Adoption:

- Designate a Language Access Lead and Notify OAO
- Ensure all staff are aware that the Framework has been adopted and that language access training requirements are in effect and will be made available via Workday
- Confirm that OAO-approved language blocks are in use on all current public-facing materials

Within 60 Days of Adoption:

- Complete a preliminary vital document inventory and submit to OAO
- Confirm vendor access and billing procedures are in place for all staff who request interpretation or translation services

- Ensure complaint referral process is documented and communicated to all public-facing staff

Within 90 Days of Adoption:

- Begin development of the Department Language Access Plan using the OAO-template
- Complete a facility walkthrough to assess signage and wayfinding needs for LEP individuals
- Identify and begin remediation of any vital documents not yet translated into Safe Harbor languages

Within 150 Days of Adoption:

- Submit draft Department Language Access Plan to OAO for review and approval
- Ensure all public-facing staff have completed foundational language access training
- Confirm emergency communication procedures include provisions

Within 180 Days of Adoption:

- Finalize and implement OAO-approved Department Language Access Plan
- Complete vital document translation for highest-priority documents
- Begin tracking and reporting language service usage data to OAO
- Conduct initial community consultation consistent with the minimum expectations set within this document

Annually:

- Review and update the Department Language Access Plan
- Complete required annual language access training refresher
- Submit language service usage data and annual compliant report to OAO
- Conduct community consultation and document findings
- Review vital document inventory and update translations as needed
- Participate in OAO's annual language access survey process

Every Two Years:

- Conduct a comprehensive review of the Department Language Access Plan with support from OAO
- Reassess department priority languages based upon updated demographic data
- Review and update signage and wayfinding to reflect changes in County demographics
- Participate in OAO's biannual Framework review process

Section 2: Governance and Accountability

The Office of Access and Opportunity may require corrective action plans when monitoring identifies gaps in meaningful access. Each department shall designate a Language Access Lead (i.e., Language Access Lead) responsible for implementing, providing staff support, and coordinating Department-specific Language Action Plans. The designated Language Access Leads will contact Civil Rights Officer, Dr. Adrian Luis Manriquez, to confirm that they have been appointed as their respective department's Lead. OAO will then provide the template for creating a department-level Language Access Plan.

A sustainable language access system requires clear governance and shared accountability across all County departments. OAO will serve as the central authority for maintaining the Countywide Language Access Framework and ensuring compliance with federal and state civil rights requirements. OAO will establish minimum standards, timelines, and reporting expectations to ensure consistency and equality in service delivery.

The following chart outlines roles and responsibilities across key language access functions for OAO, the Civil Rights Officer, department directors, Language Access Leads, frontline staff, Communications, Procurement, and Emergency Management. Each role's level of involvement, whether responsible for performing the work, accountable for the outcome, consulter for input, or informed of progress, is identified for each function to ensure clarity and shared ownership across the County.

RACI Chart: Language Access Roles and Responsibilities

R = Responsible | A = Accountable | C = Consulted | I = Informed

Function	OAO	Civil Rights Officer	Dept. Directors	Language Access Leads	Frontline Staff	Communications	Procurement	Emergency Mgmt.
Develop & maintain Countywide Language Access Framework	A	R	C	I	I	C	I	C
Review & approve Department Language Access Plans	A	R	C	C	I	I	I	I
Designate Department Language Access Lead	I	I	A/R	I	I	I	I	I
Develop Department Language Access Plans	C	C	A	R	C	C	I	C

Monitor compliance & conduct audits	A	R	C	C	I	I	I	I
Provide language access training & professional development	A	R	C	C	I	I	I	I
Procure & manage interpretation/translation vendor contracts	C	A/R	I	C	I	I	R	I
Ensure language access in emergency & public safety communications	C	A	C	C	I	C	I	R
Ensure language blocks appear in public-facing materials	C	A	C	R	I	R	I	I
Track & report language service usage data	A	R	C	R	I	I	C	I
Receive & respond to language access complaints	A	R	C	C	I	I	I	I
Coordinate language access for contractor/subrecipient compliance	A	R	I	I	I	I	C	I
Corrective action process (notice, plan review, monitoring, escalation)	C	A/R	C	R	I	I	I	I

R = Responsible (performs the work); **A** = Accountable (answerable for outcome; one per function); **C** = Consulted (input sought before action); **I** = Informed (kept updated on progress and outcomes); **A/R** = Role both performs and is accountable for the work. Department directors, Language Access Leads, and frontline staff should reference this chart to understand their specific obligations. OAO and the Civil Rights Officer use this chart to guide oversight, technical assistance, and corrective action decisions.

County-Level Responsibilities

At the County level, responsibilities include maintaining and updating the Language Access Framework, reviewing and approving Department Language Access Plans (LAPs), providing technical assistance and professional development, and monitoring compliance through audits, data collection, and community feedback. OAO will also aggregate and analyze language access data to identify gaps and inform improvements.

Department-Level Responsibilities

Departments are responsible for developing and maintaining an up-to-date LAP that aligns with the Countywide framework. Each department must track language service usage, including interpretation and translation requests, and report this data to OAO. Departments will also ensure staff understand and implement language access policies and procedures, participate in Countywide professional development, and address gaps identified through monitoring.

Compliance and Continuous Improvement

Compliance will be monitored through periodic audits, usage data, and feedback from community stakeholders. Findings will be shared with department leadership and incorporated into Countywide civil rights reporting. This governance structure ensures that language access is treated as an operational standard embedded in service delivery.

When monitoring identifies a gap in meaningful access or a failure to meet the minimum standards established in this Framework, the following corrective action process applies:

Gap Identified – OAO or the Civil Rights Officer identifies a compliance gap through audit findings, usage data, complaint intake, or departmental reporting

OAO Notice – OAO issues a formal written notice to the relevant department director and Language Access Lead describing the identified gap, the applicable standard, and the required corrective action timeline.

Department Corrective Action Plan – The department develops a written corrective action plan within 30 days of receiving the OAO notice, outlining specific steps, responsible parties, and a timeline for remediation.

OAO Approval – The Civil Rights Officer reviews and approves the corrective action plan before implementation begins. Plans that do not adequately address the identified gap will be returned for revision.

Implementation – The department implements the approved corrective action plan within the agreed timeline, with the Language Access Lead serving as the primary point of contact for progress updates.

Monitoring – OAO monitors implementation progress through follow-up audits, check-ins with Language Access Lead, and data review. Departments must report on corrective action status as requested.

Escalation – If a department fails to submit a corrective action plan, receive OAO approval, or demonstrate adequate progress within the established timeline, OAO will escalate the matter to the department director and, where necessary, to County leadership for further action.

Section 3: Assessment of Language Needs (Four Factor Analysis Framework)

All Washington County departments must evaluate the language assistance needs of their current and potential customers to inform the policy and processes necessary to implement language assistance services that increase access to their respective programs and services for all populations. This assessment may include identifying the non-English languages spoken by the population likely to access the department's services, and whether barriers, including literacy barriers, exist that might hinder effective oral and written communication with individuals with LEP. Language data may be collected from various sources, including the Census Bureau, customer files, intake forms, school systems, refugee/immigrant agencies, or community agencies.

Each department must also evaluate its capacity to meet the needs of its current and potential customers, thereby fulfilling Washington County's commitment to provide competent language assistance at no cost and on time to individuals with LEP. This includes ensuring effective communication among individuals with LEP, agency staff, and contractors.

Analysis of Four Factors

To determine which languages to provide blanket interpretation and translation services, the County will annually review the following four factors:

(1) The number or proportion of LEPs eligible to be served or likely to be encountered by the program or grantee.
   a. The County will annually determine the percentage of people potentially needing language assistance within the Washington County territory by using demographic data from the U.S. Census Bureau, school districts, nonprofit organizations, and other sources. The County will attempt to assess the prevalence of people needing language assistance in geographies smaller than countywide, where data are available.
   b. Each department in the County will receive a needs assessment tool (i.e., template) provided by the OAO. This template will aid in assessing the various language access needs of each department's current and potential customers and their capacity to meet those needs.

(2) The frequency with which LEP individuals come in contact with the program or department.
   a. The County will annually survey departments regarding the frequency of contact with people needing language assistance seeking County services by measuring instances of translation or interpretation requests, or whenever language is clearly a barrier to communication. These encounters may occur in settings such

as person-to-person contact in the field or in County facilities; over the phone; via email, social media, or the County website; or through applications, intake forms, and other service requests.

(3) The nature and importance of the program, activity, or service provided by the program to people's lives.
   a. County departments and offices will routinely evaluate the need for translation or interpretation services based on the nature and importance of County services, programs, and activities.

(4) The resources available to the grantee/recipient and costs.
   a. The County will take reasonable steps to ensure the availability of language services for individuals needing that assistance based on the factors described and without cost to the individual.

Safe Harbor Languages

The County Administrative Office (CAO) and OAO at Washington County have identified 11 Safe Harbor Languages in our local community. Safe Harbor Languages are determined by the County's population of people with Limited English Proficiency. If the group of people relying on a particular non-English language exceeds 5% of that geography's total population or is greater than 1,000 individuals, their language is considered a "Safe Harbor" language, and we are required to provide written translations of vital documents in all these languages.

Safe Harbor languages guide the County's obligations for written translation of vital documents. However, interpretation services must be provided in any language requested or needed by an individual, not only in Safe Harbor languages. Washington County's obligation to provide meaningful oral communication access applies to all individuals with limited English proficiency regardless of whether their language meets the Safe Harbor threshold.

In identifying our Safe Harbor languages, we look particularly at those who speak English "less than very well" and need language assistance to ensure meaningful access to our programs and services. As of 2024, our Safe Harbor languages and the five-year average of their population size are as follows:

- Spanish (25,669)
- Vietnamese (3,949)
- Chinese (3,054)
- Korean (2,399)
- Arabic (1,308)
- Russian (1,168)
- Japanese (1,150)
- Filipino/Tagalog (1,105)

- Khmer/Cambodian (963) *
- Persian/Farsi (675) *
- Somali (505) *

**These languages are included because, at some point in the last five years, they have met the threshold of 1,000, and our data from our internal language access log confirms the community's need for language access.*

Safe Harbor Review and Update Standard

OAO will review Safe Harbor language thresholds annually using updated demographic and service data. Any modifications will be formally documented and distributed to departments. Departments must update vital document translation inventories within 90 days of any Safe Harbor revision.

Department Priority Language(s)

In addition to countywide Safe Harbor languages, departments may identify Department Priority Languages, languages that do not meet the countywide Safe Harbor threshold but are nonetheless important for program access, safety, or effective service delivery within a specific department's service population. For example, a department serving a particular refugee or immigrant community, or one providing safety-critical services, may encounter a language frequently enough to warrant prioritized interpretation and translation resources even if that language does not appear on the countywide Safe Harbor list.

Departments should identify Priority Languages through their Four Factor Analysis and document them in their Department Language Access Plan. OAO must be notified of any designated Department Priority Languages and will maintain a countywide inventory of all Priority Languages in use across departments. Designation as a Priority Language does not create a written translation obligation equivalent to Safe Harbor languages but does require that departments ensure consistent access to interpretation services and, where feasible, translated key program materials in that language.

Communication Access for Deaf, Hard of Hearing, Deafblind, Blind, Low-Vision, and Speech-Disabled Community Members

Communication access for individuals who are Deaf, hard of hearing, Deafblind, blind, low-vision, or speech-disabled is governed by Title II of the ADA, not by Title VI language access obligations for individuals with LEP. These are distinct legal framework with specific obligations. While this Framework primarily addresses language access for LEP individuals, Washington County recognizes that effective communication access for deaf and disabled community members is an equally binding civil rights obligation and must be addressed in tandem with language access planning.

Washington County contracts with several interpretation vendors that offer American Sign Language (ASL) and Certified Deaf Interpreters (CDI). CDI is useful for hard-of-hearing individuals

who are less fluent in ASL, use a mixture of gestures and home signs, or have a psychological or physical barrier preventing them from using ASL. All CDIs are deaf or hard of hearing, so when they are used, both CDI and an ASL interpreter must be present.

Some vendors offer Video Relay Interpretation (VRI) when an in-person interpreter is not needed or feasible. Video Relay is a free service that provides full telephone accessibility for people who are deaf, hard of hearing, deafblind, and/or speech-disabled. This service allows teletypewriter users to communicate with standard telephone users through relay operators. When a deaf or hard-of-hearing community member encounters Washington County staff, they should be offered interpretation accommodation to meet their unique communication needs.

Departments must ensure that requests for communication access accommodations, including ASL interpretation, CDI, VRI, captioning, and accessible formats for individuals who are blind or low vision, are treated as ADA Title II obligations and addressed promptly. These requests should be coordinated through the department's Language Access Lead in consultation with the Civil Rights Officer.

Section 4: Plain Language Standards

Plain language is the foundation of meaningful access. Before any document is translated, it must first be written in clear, concise, and easily understood language. This approach reduces translation costs, improves accuracy, and ensures that information is accessible to the widest possible audience, including individuals with limited English proficiency and those with varying literacy levels.

Countywide Standards

Washington County will adopt plain language standards IAW HB 2702 (2007), ORS 183.750 Plain Language Law applies to all public-facing materials, including print, digital, and audio formats. These standards require departments to use short sentences and common words whenever possible, avoid jargon and idiomatic expressions, and organize content logically with clear headings and bullet points. Technical terms should only be used when necessary and must be defined in simple language.

Pre-Translation Checklist

Before any document is submitted for translation, the department or staff member responsible must confirm all of the following:

- The document reflects the final approved English version, and no further edits are anticipated
- The content has been reviewed for plain language and meets Countywide plain language standards
- All acronyms and abbreviations are defined on first use
- Idioms, slang, colloquialisms, and culturally specific expressions have been identified and replaced with plain, translatable language
- The document meets ADA accessibility standards, including proper heading structure, sufficient color contrast, and accessible formatting
- All deadlines, dates, and timeframes are accurate and clearly stated
- Rights, appeal processes, and complaint procedures are clearly explained and complete
- All contract information, including phone numbers, email addresses, and office locations, is current, accurate, and approved

Departments must retain a complete pre-translation checklist for each document submitted for translation. OAO may request documentation of checklist completion as part of compliance monitoring.

Implementation and Support

To support departments in meeting these standards, OAO will provide a Plain Language Checklist, guidance, and examples tailored to different document types such as notices, forms, and outreach materials. Consultative support and training modules will be available for staff responsible for drafting or reviewing public-facing content.

Integration with Accessibility

Plain language requirements will be integrated with other accessibility standards, including ADA and digital accessibility guidelines, to ensure consistency across all County communications. Departments must certify that documents meet plain language standards before submitting them for translation or interpretation. This step is essential to achieving equitable access and reducing barriers for all community members.

Editorial style

Any agency may follow DAS editorial style, which addresses capitalization, punctuation, common terms, quotation marks, phone numbers, time of day, and more.

Section 5: Emergency and Life Safety Communications

Statement of Responsibility
Language access requirements remain in effect during all emergency preparedness, response, and recovery activities. Washington County is responsible for ensuring that individuals with LEP have timely and meaningful access to critical information and services, including during evacuations, hazardous air quality including wildfire smoke, extreme heat or cold emergencies, severe weather, boil water or do-not-drink notices, sheltering operations, communicable disease responses, road closures, and other emergency conditions. Individuals with LEP should have access to information about protective actions and accessing emergency services and benefits. Language access before and during an emergency is a shared responsibility between County departments, OAO, and Emergency Management. Coordination between these entities should occur to ensure multilingual life-safety communication when feasible.

Scope of Emergency and Life Safety Communications
Emergency and life safety communications requiring translation and multilingual distribution include:

- Emergency alerts (Wireless Emergency Alerts, Emergency Alert System, and opt-in Public Alerts)
- Public-facing website content (e.g., Current Incidents webpage, Stay Cool Washington County, and other pages used by departments to share emergency-related information)
- Public-facing website banners
- Select social media posts requiring immediate action to preserve life safety

Resource and Feasibility Limitations
Providing multilingual emergency communication in every language and every circumstance may not be immediately feasible due to:

- Lack of pre-translated emergency templates
- Lack of available funding to support rapid translation
- Lack of response staff to support multilingual translation

Providing multilingual translation emergency communication must balance speed with accuracy. Machine translation tools (such as Google Translate or other-AI translated content) are permitted, notwithstanding Section 14's general restriction on machine translation for life-safety information, in the following circumstances:

- When emergency messages must be released quickly and cannot be delayed, even by an hour;
- On public-facing websites when the information has not already been pre-templated or pre-translated; and
- On public-facing websites when the information changes frequently.

Departments Will Work Together To:

- **Maintain a pre-translated template library.** This countywide library shall cover the most common emergency scenarios and safety guidance, be reviewed and updated annually, and be easily and quickly accessible to all staff responsible for communications during an emergency.
- **Provide multilingual road and disaster center signage.** All emergency locations, including shelters, evacuation routes, and disaster centers, must utilize clear, highly visible, and multilingual signage, including pictograms where appropriate, to support rapid understanding and navigation regardless of language proficiency.
- **Engage community partners for message distribution.** Responding Public Information Officers (PIOs) will leverage existing relationships with community organizations, cultural liaisons, and trusted messengers to distribute emergency information to LEP communities through established community channels.
- **Share at least one multilingual social media post per incident,** unless the information being shared relates to critical life safety and requires the public to take immediate action.
- **Put an interpretation service on standby** when a Public Inquiry Center (PIC), shelter, or other disaster center is activated.

PIO Coordination During Emergencies

During an emergency, department PIOs participating in the response must coordinate with the Lead PIO for that response on all multilingual communications. Together, the Lead PIO and responding PIO staff will plan multilingual messaging themes, modes of communication, and timing. Responding PIOs are then responsible for developing the content, obtaining Lead PIO approval, coordinating translation, and managing distribution of multilingual messages.

All PIOs involved in aa response must maintain awareness of language access requirements and speak up in situations where language access is not adequately being addressed and resources are available to address it.

OAO's Role in Supporting Emergency Communications

To support Washington County's ability to provide emergency communications, OAO will:

- Work with contracted translation vendors to identify feasible parties and develop after-hours vendor processes, including an agreement and protocol outlining how to request interpretation and translation services outside of regular business hours;
- Provide PIOs with approved multilingual language blocks and guidance for their use;
- Be available to quickly consult with and provide guidance to responding PIOs on language access implementation; and
- Support PIOs involved in a response when language access cannot be promptly met.

Departments are encouraged to collaborate and coordinate regarding the development of language access procedures, resources, and capabilities. During emergencies, departments are also encouraged to share personnel (e.g., bilingual and public communications staff) and

resources (e.g., templates and vendor arrangements). Though accountability falls to each department, compliance may be most efficiently achieved and maintained through development of countywide resources (e.g., pre-translated templates).

Oversight and Accountability

OAO will provide guidance, monitor compliance, and support departments in integrating language access into emergency communication protocols. Failure to incorporate language access into emergency communications may result in noncompliance with federal civil rights requirements.

Section 6: Data, Metrics, and Continuous Improvement

A robust language access system depends on accurate data collection and ongoing evaluation. OAO will establish a centralized process for gathering and analyzing language access data to ensure accountability and inform continuous improvement efforts.

Data Collection Requirements

Departments will log all interpretation and translation requests, including the language requested, type of service provided, date and duration, vendor used, cost, and turnaround time. Staff should also provide feedback on service quality to help identify areas for improvement. This logging process will create a reliable record of service usage and allow the County to monitor trends over time.

Annual Surveys

In addition to ongoing logging, OAO will administer an annual language access survey to all departments, bilingual employees, and vendors. This survey will assess progress, identify emerging needs, and evaluate the effectiveness of current strategies. Survey results will be used alongside logged data to provide a comprehensive view of language access performance.

Countywide Metrics

OAO will track the following countywide metrics on an annual basis to assess the status and effectiveness of Washington County's language access system. These metrics will be reported in the annual Language Access Report and shared with department directors and County leadership:

- ***Percent of Departments with a Current, OAO-Approved Language Access Plan –*** Target is 100% of departments maintaining an active LAP that has been reviewed within the past two years
- ***Staff Training Completion Rate –*** Percent of County staff completing required language access training, tracked by department and job classification
- ***Number of interpretation encounters –*** Total volume of interpretation service requests by language, service modality, and department, tracked quarterly
- ***Translation Turnaround Time –*** Average time from document submission to delivery of translated materials, measured against established turnaround standards by document type and urgency level
- ***Vital Document Translation Status –*** Percent of identified vital documents available in all Safe Harbor languages, with a target of 100% compliance
- ***Complaints and Access Barriers –*** Number and nature of language access complaints received, resolved, and pending, including time to resolution and corrective actions taken.

- ***Vendor Performance –*** Vendor compliance with contract standards including quality, timeliness, confidentiality, data reporting, and emergency availability, based on department feedback and OAO review.
- ***Emergency Communication Timeliness –*** Percent of emergency communications issued in Safe Harbor languages within established timeframes, tracked by emergency type and department.

Countywide Analysis and Reporting

OAO will aggregate data across vendors, departments, and employees to identify trends, gaps, and performance issues. Key metrics will include frequency of language service requests by language, volume and cost of services, vendor performance indicators, and staff professional development completion rates. Complaints or reported access barriers will also be tracked and analyzed.

Continuous Improvement Process

OAO will publish an annual Language Access Report summarizing findings, progress, and recommendations. Departments will use this report to update their Language Access Plans and address identified gaps. This data-driven approach ensures that language access remains responsive to community needs and aligned with County and civil rights standards. Furthermore, this data may be used to inform decision-making around bilingual designation of positions.

Section 7: Interpretation Services

Washington County is committed to providing qualified interpretation services to all individuals with Limited English Proficiency at no cost. Interpretation services must be provided promptly and in a manner that ensures accurate, complete, and impartial communication in all County programs, services, and activities.

Guidance on Interpretation Services

If language assistance cannot be arranged promptly, staff should consult their department Language Access Lead (Liaison), if assigned, or escalate to a supervisor. Staff should not use minors, family members, friends, or by standards as interpreters under any circumstances except in a true emergency when no qualified interpreter is immediately available and delay would cause immediate harm. Even in such cases, a qualified interpreter must be secured as soon as possible, and the emergency use of an unqualified individual must be documented. Moreover, a community members may also request an external interpreter regardless of whether the program/department has a qualified bilingual staff available.

Interpretation must be provided, not merely offered, in the following situations regardless of the complexity or duration of the interaction:

- Determining rights, benefits, or eligibility for services
- Enforcement actions or code compliance proceedings
- Complaint intake and investigation processes
- Appeals and grievance procedures
- Safety and emergency communications
- Health and medical services or referrals
- Housing and shelter services
- Consent processes, including informed consent
- Financial obligations, agreements, or determinations
- Law enforcement interactions
- Public participation opportunities, including hearings, meetings, and comment periods

Type of Interpretation Services

Each Washington County department will provide spoken or sign language assistance through bilingual staff and qualified interpreters in both face-to-face and telephone encounters. Interpretation refers to listening to communication in one language and orally or visually converting it into another language while retaining the same meaning. Translation refers to the replacement of written text from one language into equivalent written text in another language. These are distinct functions requiring distinct skills and qualifications, an interpreter is not necessarily a translator and vice versa.

Role of Bilingual Staff, Qualified Interpreters, and Qualified Translators

Washington County recognizes three distinct categories of language service providers including: bilingual staff, qualified interpreters, and qualified translators. Managers and supervisors are required to ensure accuracy and quality of language access services and resources. This involves consideration of qualifications, appropriate uses, and limitations. Additionally, there are some areas of work in which using a qualified interpreter and/or translator is required regardless of bilingual staff availability or capacity.

Bilingual Staff are County employees in a designated Bilingual position who demonstrate proficiency in a language other than English, have passed the County's language proficiency exam, and are receiving a bilingual pay differential. Bilingual staff may use their language skills to provide interpretation and translation services in certain circumstances, including those not considered to be high stakes situations and when appropriate types and levels of proficiency have been established to ensure appropriate quality and accuracy of services provided. Bilingual staff may not serve as interpreters in any of the high-stakes situations listed above unless they are also credentialed as qualified interpreters. When no bilingual staff member with required language skills is available and/or when a member of the public requests it, employees must request services through an approved vendor.

Qualified Interpreters are professional interpreters who meet recognized standards of competency, accuracy, and ethical conduct. Qualified interpreters must be used for all high-stakes interactions listed above, all formal County proceedings, and any situation where miscommunication could affect an individual's rights, safety, health, and/or access to services. Qualified interpreters are available through the County's approved vendor list in telephonic, video remote, and in-person modalities.

Qualified Translators are professional translators who convert written materials from one language to another with accuracy, cultural competency, and subject matter knowledge appropriate to the document type. Qualified translators must be used for all written translation of vital documents, legal materials, and notices of rights..

Language Access services are free of charge to all community members. Telephonic, video-based, and onsite interpretation are available. For interpretation in group settings, use the Interpretation Decision Visual Guide, located in the Appendices (also available on Horizons), to determine when to provide interpretation and which mode to use.

Interpreter Ethics, Standards, and Role Boundaries

All interpreters providing services on behalf of Washington County, whether through an approved vendor or as bilingual staff, are expected to adhere to the following professional standards:

- ***Accuracy –*** Interpreters must render all communication completely and accurately without omitting, adding, or altering content. Summarizing is not permitted unless explicitly directed by the staff member conducting the interaction and documented accordingly.
- ***Confidentiality –*** Interpreters must maintain strict confidentiality of all information encountered during service delivery and may not disclose any content of an interpreted interaction to any party not directly involved.
- ***Impartiality –*** Interpreters must remain neutral and may not express personal opinions, provide, advice, or advocate for either party during an interpreted interaction.
- ***Role Boundaries –*** Interpreters serve as communication conduits only. They may not make decisions on behalf of a community member, complete forms for individuals, provide legal or benefits advice, or take on a case management or advocacy role.
- ***Conflict of Interest –*** Interpreters must disclose any personal, familial, or community relationships with a community members prior to beginning an interpretation and must recuse themselves if a conflict of interest exists.
- ***Trauma-Informed Communication –*** Interpreters working in interactions involving sensitive topics, such as domestic violence, child welfare, immigration, sexual assault, law enforcement, or mental health, must apply trauma-informed communication principles, including maintaining a calm and neutral tone, allowing pauses, and avoiding language that could potentially re-traumatize or destabilize the individual.

Modes of Interpretation

When requesting interpretation services, employees may request either consecutive interpretation, where the interpreter listens to a complete statement and then interprets, or simultaneous interpretation, where the interpreter renders the message in the target language in real time as the speaker continues. Consecutive interpretation is recommended for one-on-one interactions. Simultaneous interpretation is recommended for larger group presentations, particularly when simultaneous interpretation equipment is available.

Equipment and Virtual Meeting Considerations

The use of simultaneous interpretation equipment such as headsets and transmitters is preferred for in-person events so that all participants can be in the same room and experience the meeting on approximately equal terms. Equipment can be purchased by departments or leased from interpretation vendors. If headsets are not available, provide a comfortable space within audible range of the interpreters. For virtual meetings, ensure the platform can accommodate simultaneous interpretation and allow additional time to address platform-specific needs. Consider recording both the English and interpreted audio feeds. Note that events longer than one hour may require more than one interpreter to allow for breaks.

Event Preparation and Best Practices

At least three to four business days before the event, share the meeting format and materials, including agendas, facilitator scripts, and presentation slides, with the interpretation vendor to allow interpreters to research technical terms and clarify intended meanings. One to two business days before the event, consider a brief meeting with interpreters to review the agenda and event details. Brief presenters on short, simple sentence construction and the importance of pacing for interpretation. Confirm interpreter names and provide a contact number for last-minute logistics. On the day the event, test all audio equipment before the start time and have backup batteries available. During the event, monitor equipment performance, support both presenters and interpreters, and remind participants to take breaks. After the event, debrief with presenters, participants, and interpreters to identify any interpretation issues and document improvements for future events. Consider disseminating interpreted audio or video to individuals needing language assistance and to the public.

Section 8: Written Translations

Overview of Written Translation Services

Translations can be done in writing, verbally, or in a video. The Translation Decision Visual Guide (located in the Appendices) can help determine which documents should be proactively translated. If documents with deadlines need translating, the client's deadline should be extended to account for translation time, as the client should never be penalized for needing a translated document.

Language Selection and Geographic Considerations

When the target audience is all of Washington County, use the list of safe harbor languages from Section 3. For geographies that are smaller than countywide, use data from the U.S. Census Bureau, school districts, the County's annual "four-factor" assessment and other official sources. To assist with these smaller geographies, use the information provided by the Washington County Research, Analytics, Informatics and Data (RAID).

Prioritization of Content for Translation

Washington County staff first need to determine the level of importance of the content to be communicated and strongly consider translation whenever the content is of greater importance. As a guide, the following four categories should be used:

- ***Life Safety/Emergency*** – Information that would facilitate the preservation of life, safety, or property in the context of an emergent event such as an earthquake, wildfire, structural fire, or episode of unhealthy air or water quality. This category would also include information affecting an individual's access to County services vital to basic human needs, such as shelter, health care, or due process protections regarding incarceration, foreclosure of residential property and so forth.

- ***Prevention/Preparedness*** – Information that would enable an individual or family to make choices or benefit from programs in a non-emergency context to avoid loss of life, injury, or disease. Examples would include guidance about vaccinations, use of smoke detectors, addiction treatment, earthquake retrofitting.

- ***Community Engagement/Governance*** – Information that would facilitate the full participation of individuals in democratic processes and improved quality of life, including access to content at public meetings, town halls, community surveys, voter registration, and elections.

- ***Other Content*** – All other information of relevance to the public not described in the categories above.

Translation Decision Table

Use the following table to determine the appropriate level of translation based on content category and audience:

Content Category	Audience	Required Approach
Life Safety/Emergency	All LEP Individuals	Full Translation in Safe Harbor Languages; Pre-Translated Templates Required
Vital Documents (Rights, Benefits, Eligibility, Enforcement, Consent, Appeals)	All LEP Individuals	Full Translation in Safe Harbor Languages
Prevention/Preparedness	Broad Public Audience	Full Translation in Safe Harbor Languages; Summary Translation Acceptable Where Full Translation is Not Feasible
Community Engagement/Governance	Targeted or General Public	Full Translation Preferred; Summary Translation or Language Block Acceptable for General Outreach Where Full Translation is Not Feasible
Other Content – General Information	Broad Public Audience	Language Block with Offer to Translate Upon Request
Any document – individual request	Individual Community Member	Full Translation in Requested Language Regardless of Safe Harbor Status

Alternatives When Full Translation is Not Possible

When adequate funding for full translation is not available, the following alternatives are recommended in order of preference:

- **Use of Universal Symbols or Pictures** – This approach would involve illustrations, diagrams or pictorial displays meant to convey the meaning of the relevant content using little-to-no English words. This approach is especially important for life safety or emergency-related content or signage. Wherever possible, follow discipline-specific standards recognized by trade associations or government agencies.

- **Summary Pages** – Translating the executive summary or synopsis into all identified languages. The target audience's education level should be considered when creating these translations.

- **Cover Pages** – A page listing statements in each identified language offering to translate the full content at no charge.

- **Messaging to Offer Translations on Request**- Sending the document in English with a page in each Safe Harbor language explaining that translation is available upon request, along with a plan for receiving and fulfilling those requests.

In addition to proactively translating vital documents, departments must be responsive to individual community members' requests and translate documents into any language upon requests, not only Safe Harbor languages. This also includes offering alternative formats.

Alternative Formats for Accessibility

Alternative formats, including large print, digital, audio, and braille, provide equal access to information for individuals who are blind or visually impaired. Alternative formats are both a legal obligation under ADA Title II and a practical tool for ensuring equitable access. Departments should consider the target audience's education level when selecting formats, as technical or discipline-specific language may remain inaccessible even after formatting adjustments.

Translation Quality Control Requirements

All translated documents must meet the following quality control standards before distribution or publication:

Human Review – All machine-assisted or vendor-produced translation must be reviewed by a qualified human translator before distribution. Unreviewed machine translations may not be used for vital documents, high-stakes communications, or any of the situation types listed in Section 7.

Version Control – Each translated document must carry a version number that corresponds to the English source document version. When the English version is updated, all translations must be flagged for review and updated accordingly before the revised document is distributed.

Date of Last Review – All Translated documents must display the date of the most recent translation review. Documents not reviewed within the past two years must be flagged for re-review before continued distribution.

Document Owner – Each translated document must have a designated department owner responsible for ensuring the translation remains current, accurate, and accessible.

Accessibility Review – All translated documents must be reviewed for ADA accessibility compliance, including proper heading structure, sufficient color contrast, readable font size, and screen reader compatibility, before distribution.

Review When English Version Changes – Whenever the English source document is substantively revised, the document owner must initiate a new translation and quality review cycle before the updated document is distributed in any language.

Instructions for Requesting Translations

The following instructions apply to staff when requesting document translations:

• Review the document in English to ensure it is written in plain language and meets the pre-translation checklist standards in Section 3. Avoid jargon, acronyms, and idioms.

• Add a feedback line at the bottom of the document: "Please feel free to give us feedback on the translation of this document by emailing civilrights@washingtoncountyor.gov."

• Select a translation vendor from the Translation/Interpretation Vendor Lists available on the Language Access page in Horizons.

• Email the vendor, attach the document in need of translation, and include your department and billing information.

• Note that there is no set industry pricing standard. Some agencies charge per word, others per hour, and some do a combination of both. For larger projects, we recommend getting quotes from several vendors to determine which one is most cost-effective.

• Communicate your deadline and extend it to account for translation time. Many vendors charge a rush fee for faster turnaround.

Vital Documents

Each department will need to determine which documents are considered "vital" and develop a plan to have all vital documents translated into the 11 Safe Harbor languages. Departments are responsible for ensuring that adequate resources are budgeted for these translation needs.

Vital documents will vary by department's needs and services. Following Language Assistance Policy #207, documents considered vital are those that are critical to ensuring meaningful access to major activities and programs for beneficiaries generally and for people needing language assistance specifically. These include, but are not limited to:

• Written notice of rights, denial, loss, or decrease in benefits or services

• Claim or application forms

• Notices regarding the availability of language assistance services at no cost to the individual

• Public outreach or educational materials

• Consent orders, decrees, memoranda of understanding, or other types of pleadings or litigation materials

- Administrative complaint, release, or waiver forms
- Letters of findings
- Letters or notices about statutes of limitations, referrals to other agencies, decisions to decline to investigate a case, or case disclosures
- Notices of community meetings or other community outreach activities

Funding Responsibility and Escalation

Budget limitations do not eliminate or reduce civil rights obligations under Title VI, ADA Title II, related federal and state laws, or Washington County Policy. When a department identifies insufficient funding to meet its translation obligations, the following escalation process applies:

Step 1 – Department Identification:

The department identifies a funding gap that prevents it from meeting a translation obligation and documents the specific need, cost, and timeline.

Step 2 – OAO Notification:

The department immediately notifies OAO and the Civil Rights Officer in writing, providing documentation of the funding gap, and the civil rights obligations at stake.

Step 3 – OAO Assessment:

OAO assess the situation, determines the legal risk to the County, and identifies whether interim alternatives, such as summary translation, language blocks, or on-request translation, are permissible given the document type and situation.

Step 4 – Corrective Planning:

OAO works with the department and, where necessary, County leadership and Finance to identify a corrective funding plan. Interim alternatives may be authorized by OAO as a temporary measure only, they do not constitute permanent compliance.

Step 5 – Escalation to County Leadership:

If the funding gap cannot be resolved at the department level, OAO will escalate County leadership and, if necessary, flag the risk in the County's civil rights compliance reporting.

Section 9: Language Blocks

A language block is a standardized, pre-approved piece of text used across documents, forms, signage, and communications to ensure consistent, compliant language access throughout the County. In the context of this Language Access Framework, a language block is a ready-to-use message that staff copy and paste to clearly tell people, in multiple languages when needed, how they can access translation services. Ensure legal compliance with Title VI and ADA by using approved wording and create consistency so every department communicates access the same way.

All departments must use Office of Access and Opportunity (OAO) approved language blocks in public-facing materials. Departments may not create new language blocks or modify approved language blocks without prior written authorization from OAO. OAO maintains the official translated language block library, which serves as the sole authoritative source for all approved language blocks and their translated version in Safe Harbor languages.

Language blocks must be:

- Clearly visible and easy to read
- Written in plain language
- Included in vital and high-impact documents
- Translated into Safe Harbor languages when required

Approved Language Blocks

1. ***General Language Assistance Statement (Short Form)***

Use for flyers, outreach materials, and brief communications: “You can get this document translated or explained in another language at no cost. Call [Insert Phone Number], email [Insert Email], or ask County staff for help.”

2. ***General Language Assistance Statement (Full Form)***

Use for letters, notices, and program materials: “Washington County provides free language assistance services, including interpretation and translation, to individuals who need them. If you require language support, please contact our office so we can assist you.”

3. ***Multilingual Tagline (Vital Documents Requirement)***

Use for vital documents, forms, and notices of rights (this statement must be translated into all Washington County Safe Harbor languages and placed in a prominent location): “Language assistance services are available free of charge. Call [Insert Phone Number].”

4. ***Interpretation Availability Statement (Service Points)***

Use for front desks, service counters, and in-person services: “Interpreter services are available at no cost. Please let staff know if you need assistance in your preferred language.”

5. Emergency and Life Safety Communication Statement

Use for emergency alerts and urgent communications: “Important information is available in multiple languages. Interpretation services are available upon request. Call [Insert Phone Number] for assistance.”

Mandatory Usage Requirements

- Flyers and outreach materials must include the short form statement
- Letters and notices must include the full form statement
- Vital documents must include the multilingual tagline translated into Safe Harbor languages
- Forms and applications must include the full form statement and tagline when applicable
- Service locations must display the interpretation availability statement
- Emergency communications must include multilingual access messaging when feasible

Placement Guidance

Language blocks must be placed where they are easily visible to the reader. Acceptable placement includes:

- Footer of documents
- First page of vital documents
- Instruction sections of forms
- Posted signage at service points

OAO Oversight

The Office of Access and Opportunity (OAO) is responsible for:

- Maintaining and updating approved language blocks
- Providing translated versions in Safe Harbor languages
- Monitoring compliance across departments
- Issuing guidance on proper usage

Departments are responsible for ensuring all materials meet these requirements and are updated as standards evolve.

Compliance Statement

The use of standardized language blocks supports Washington County’s compliance with federal civil rights requirements, including Title VI and ADA, and ensures all community members have equal access to County services.

Section 10: Vendor and Procurement Integration

Language access services depend on a coordinated contractor and vendor strategy to ensure consistency, quality, and cost efficiency across all departments. Washington County will maintain a centralized system for contracting and managing language service providers, eliminating the need for departments to source vendors or create parallel processes independently.

Countywide Vendor Standards

OAO will establish and maintain vendor standards that define interpreter and translator qualifications, confidentiality requirements, turnaround times, and quality assurance measures. These standards will apply to all contracted vendors and will be reviewed periodically to ensure compliance and effectiveness.

Required Contract Language

All contracts with interpretation and translation vendors must include the following standard provisions. Vendors who cannot demonstrate compliance with these requirements are not eligible for County contracts:

- ***Qualified Interpreters and Translators –*** All interpreters and translators must hold relevant professional certifications or demonstrated qualifications appropriate to the language pair and service type. Vendors must provide documentation of interpreter and translator credentials upon request.
- ***Confidentiality –*** All vendor staff, contractors, and subcontractors must maintain strict confidentiality of all information encountered during service delivery, in compliance with applicable federal and state privacy laws. Vendors must have a written confidentiality policy and ensure all personnel sign confidentiality agreements prior to performing services.
- ***Data Reporting –*** Vendors must respond to annual survey provided by OAO, which seeks information about service utilization, language, service type, complaints, duration, credentials, and various vendor outcomes.
- ***Prohibition on Unapproved Machine Translation –*** Vendors may not use automated or AI-assisted machine translation tools for any County service without prior written approval from OAO. Any approved use of machine translation must be clearly disclosed and must include human review for accuracy before delivery.
- ***Rare-Language Capacity –*** Vendors must demonstrate capacity to provide services in rare or less commonly spoken languages and must maintain a process for sourcing qualified interpreters for languages not routinely available. Response timeframes for rare-language requests must be specified in the contract.
- ***Emergency Availability –*** Vendors must provide or have documented access to interpretation services outside of regular business hours, including evenings, weekends,

and holidays to support emergency and life safety communications. After-hours contact protocols must be included in the contract.

- ***Complaint Process –*** Vendors must have a documented internal complaint and quality grievance process for service failures, errors, or misconduct. All complaints involving County services must be reported to OAO within a timeframe specified in the contract.
- ***Subcontractor Compliance –*** Vendors that subcontract any portion of County language access services are responsible for ensuring that all subcontractors meet the same standards required of the primary vendor. Vendors must disclose all subcontracting arrangements to OAO and ensure subcontractors are bound by the same contractual obligations.

Department Use of Approved Vendors

Departments will use the County's approved vendor list for all interpretation and translation needs. This list will include guidance on routine versus emergency requests, ordering procedures, billing codes, and available service modalities such as in-person, telephonic, video remote interpretation, and document translation. Specialized services, including American Sign Language (ASL), Certified Deaf Interpreters (CDI), and rare-language requests, will also be addressed under these guidelines.

Performance Monitoring and Gap Analysis

OAO will conduct regular reviews of vendor performance based on data collected from vendors, departments, and bilingual staff regarding service quality, timeliness, and cost. Identified gaps, such as language coverage or after-hours availability, will inform procurement adjustments and contract negotiations. By integrating vendor management into the Countywide infrastructure, Washington County ensures equitable access to language services while maintaining fiscal responsibility and operational efficiency.

Section 11: Notifications

When community members enter any of our facilities, they should be able to request interpretation or translation in their preferred language easily. At Washington County, we use iSpeak cards, federally mandated public notices, and posters to help facilitate these requests.

All front desks, reception, and intake areas where the public might engage with County staff should have a language selection card or poster prominently displayed. The posters explain rights to a free interpreter and have this message translated into the Safe Habor languages. Users can then select their language, and a staff member will call one of our interpretation vendors to request assistance in that language.

The iSpeak card is one OAO-approved language identification tool that can be shared whenever an individual needs to access government-funded programs and services. When providing an iSpeak card to an individual, let them know that it is an important piece of paper that should be kept in a place that is easily accessible to show a staff person when in need of services. OAO will review the iSpeak card annually to ensure it remains current, accurate, and aligned with the County's approved language access tolls and Safe Harbor language list.

Notice of Free Language Assistance

Notice of the availability of free language assistance must appear in the following locations and materials across all County departments:

- ***Service Counters and Front Desks –*** Posted signage in Safe Harbor languages must be prominently displayed at all public-facing service points
- ***Department and Program Websites –*** language assistance notice must appear on the main landing page and on any page where services, applications, or program information are accessed
- ***Applications and Intake Forms –*** Notice must be included in the instructions section of all applications and intake forms, in both the full form language blocks and the multilingual tagline where applicable
- ***Public Meeting Notices –*** All notices of public meetings, hearings, and community engagement events must include language assistance availability information and contact details
- ***Vital Documents –*** All vital documents must include the multilingual tagline translated into all Safe Harbor language in a prominent location
- ***Outreach Materials –*** All flyers, postcards, brochures, and outreach collateral must include at minimum the short form language assistance statement
- ***Phone Scripts –*** Department phone scripts and automated phone system recordings must include a statement in the most common Safe Harbor languages informing callers of the availability of free interpretation services

- ***Digital Forms –*** All digital forms and online applications must include a language assistance notice and a mechanism for individuals to request assistance in their preferred language before or during completion

Signage and Wayfinding

Each department will conduct a walkthrough of its facilities to determine whether there is sufficient wayfinding signage for LEP individuals and will present its findings here along with a plan to create further language-accessibility signage in the future.

For language block requirements applicable to all County communications and public-facing materials, including approved language block text, mandatory usage requirements, and placement standards, refer to Section 9: Language Blocks.

Section 12: Community Consultation

Washington County recognizes that meaningful language access requires ongoing engagement with the communities it serves. Community consultation is essential to ensure that language access services are responsive, culturally appropriate, and aligned with real-world needs.

Each Washington County Department will consult with relevant communities, in accordance with this and other federal policies, to identify language assistance needs of individuals with LEP, implement appropriate language access strategies to ensure individuals with LEP have meaningful access in accordance with assessments of customer need and agency capacity, and evaluate progress on an ongoing basis. Departments must actively seek and consider feedback from community members with LEP, as well as from organizations that represent and serve these populations. This includes incorporating input into the development, review, and improvement of language access services, materials, and outreach strategies.

The relevant communities should always include beneficiaries but also be viewed more broadly to include recipients of federal financial assistance, vendors, advocacy organizations, and representatives from a broad cross-section of the language access community, including people living with disabilities. Departments may also use studies, reports, or other relevant material produced by stakeholders as forms of stakeholder input.

Minimum Consultation Expectations

Each department's Language Access Lead is responsible for planning and conducting community consultation, or coordinating its delegation, with the department director accountable for ensuring consultation requirements are met. To ensure consistency and accountability in community consultation across all departments, the following minimum expectations apply:

Who Must Be Consulted – Departments must consult with, at minimum, current and potential LEP services users, community-based organizations (CBOs) serving LEP populations in the department's service area, disability advocacy organizations where relevant, trusted cultural and ethnic community groups, and any federally required stakeholder groups specific to the department's funding streams.

How Often – Departments must conduct formal community consultation at minimum once per year as part of their Language Access Plan review cycle. Departments that serve a large or growing LEP population, have high volumes of direct public contact, or have had recurring complaints or monitoring findings related to language access must conduct formal consultation at least semi-annually. OAO will work with departments to determine which of these criteria apply during the annual Language Access Plan review. Additional consultation must occur whenever a significant change is made to a program, service, or communication approach that impacts LEP community members, and whenever data identifies a recurring access gap.

What Qualifies as Consultation – Formal community consultation means active, two-way engagement with community members or organizations, including listening sessions, focus groups, structured surveys, advisory committee or subcommittee meetings, and direct meetings with CBOs or advocacy organizations.

How Feedback is Documented – Departments must maintain a written record of all community consultation activities, including the date, format, participants, topics covered, and key findings. This documentation must be submitted to OAO as part of the department's annual Language Access Plan review cycle, rather than held at the department level pending request.

How Departments Respond – Departments must review consultation findings within 60 days and document how feedback has been or will be incorporated into language access planning and service delivery. Where feedback cannot be acted upon, departments must document the reason and identify any alternative steps taken. Reponses to community feedback must be communicated back to participating community members or organizations where feasible.

How OAO Uses Feedback to Improve Countywide Systems – OAO will aggregate consultation findings across departments annually to identify systemic gaps, emerging language needs, and recurring barriers. These findings will inform updates to the Language Access Framework, the Safe Harbor language list, the countywide vendor assessment, training content, and the annual Language Access Report. OAO will share aggregated findings with County leadership.

OAO Support for Community Consultation

OAO will support community consultation efforts by supporting subcommittees or working groups to review translated materials and messaging for cultural accuracy and relevance, coordinating with community-based organizations, cultural groups, and service providers to gather feedback, conducting periodic surveys, listening sessions, or focus groups to assess community experience and emerging needs, and providing guidance to departments on incorporating community feedback into program design and service delivery.

Department Expectations

Departments are expected to integrate community feedback into language access planning and implementation, partner with trusted community organizations to improve outreach and communication, and document consultation efforts and outcomes as part of program reporting and continuous improvement. Community consultation is a continuous process and will inform updates to the Language Access Program, ensuring that Washington County remains responsive, fair, and compliant with civil rights requirements.

Section 13: Shared Tools and Professional Development

Consistency in language access depends on equipping departments with standardized tools and comprehensive staff professional development. Washington County will maintain a centralized repository of resources to reduce duplication of effort and ensure uniform implementation across all departments.

Shared Tools

OAO will provide departments with templates for Language Access Plans, signage standards, and language access decision guides to help staff determine when and how to provide interpretation or translation. Additional resources will include plain language checklists, rewrite guides, and examples tailored to different document types. These tools will ensure that departments have clear, practical guidance for implementing language access policies.

Professional Development

Each Washington County department will commit resources to ensure management and staff understand and can implement the policies and procedures outlined in this plan. Professional development will be mandatory for all staff who interact with the public and will be incorporated into onboarding and annual refresher programs. Modules will cover the use of interpretation and translation services, plain language principles, and compliance requirements.

Frontline staff will receive specific instruction on how to use public notices and posters, as well as how to request interpretation and translation services from approved vendors. Leadership and supervisory staff will receive additional professional development on monitoring responsibilities, billing procedures, and ensuring staff compliance.

The County recognizes that every employee has a responsibility to assist the public in acquiring language access. Therefore, all staff should know how to request interpretation and translation services when needed. OAO will track professional development completion rates and provide departments with periodic updates to ensure accountability.

The County recognizes that every employee has a responsibility to assist the public in acquiring language access. Therefore, all staff should know how to request interpretation and translation services when needed. The following required learning levels apply to all County employees based on their role and responsibilities:

All Staff – All County employees must complete foundational language access training covering the County's legal obligations under Title VI and the ADA, what meaningful access means in practice, how to recognize when a community member needs language assistance, and how to connect individuals to interpretation and translation services through approved vendors.

Public-Facing Staff – Staff who regularly interact with the public must complete additional training on how to use iSpeak cards, public notices, and language access posters, how to initiate interpretation requests through approved vendors, and how to respond appropriately when a community member requests language assistance or an ADA accommodation. This training will be incorporated into onboarding and annual refresher programs.

Supervisors and Managers – Supervisors and managers must complete training on monitoring staff compliance with language access obligations, billing procedures for interpretation and translation services, responding to language access gaps identified through monitoring or complaints, and supporting staff in implementing language access policies consistently.

Language Access Leads (Liaisons) – Designated Language Access Leads must complete advanced training on developing and maintaining Department Language Access Plans, coordinating with OAO on compliance monitoring and reporting, tracking language service usage data, and serving as the department's primary point of contact for language access implementation.

Communications Staff – Staff responsible for developing or approving public-facing communications must complete training on language block requirements and placement standards, the pre-translation checklist process, Safe Harbor language obligations for vital documents, and the civil rights review checkpoint for external communications.

Emergency Management and Public Information Staff – Staff responsible for emergency communications and public information must complete training on language access requirements during emergency and life safety events, use of pre-translated emergency templates, after-hours vendor protocols, multilingual alert and shelter signage standards, and coordination with OAO during emergency activations.

Procurement and Contract Managers – Staff responsible for procurement and contract management must complete training on the County's standard contract language requirements for language access vendors, subcontractor compliance obligations, and the prohibition on unapproved machine translation tools in County contracts.

By centralizing tools and professional development, Washington County reduces inconsistency, improves efficiency, and ensures that language access is embedded as a core operational standard rather than an optional service.

Section 14: Digital Information

Washington County recognizes that artificial intelligence (AI) and automated translation tools are increasingly available and may offer utility in limited contexts. The County's position is that these tools may be used to support initial, brief point-of-contact interactions, such as front desk inquiries where a staff member needs to quickly bridge a language gap before connecting an individual to appropriate services. Certain topics require an immediate translation to a qualified interpreter regardless of how brief the interaction appears, including questions involving legal deadlines, health or medical concerns, eligibility, or anything touching an individual's rights or benefits. Staff should trat these topics as an automatic signal to move the conversation to a qualified interpreter rather than continuing with AI-assisted translation. AI and automatic translation tools are not an acceptable substitute for qualified professional interpretation or translation in substantive interactions, including but not limited to intake processes, case management, eligibility, legal or benefits-related communications, or any exchange where accuracy is critical to an individual's rights or access to services.

Machine translation may not be the role method of communication for any of the following:

- Rights and benefits information
- Eligibility determinations
- Deadlines and time-sensitive notices
- Legal notices and enforcement communications
- Emergency instructions and life safety information
- Complaint intake and investigation processes
- Public participation materials including hearing notices, comment opportunities, and meeting agendas

In all of the above situations, human-reviewed or professionally translated content is required. AI-assisted translation tools are not held to the same standards of accuracy and professional accountability as certified interpreters and translators, and reliance on them beyond initial brief exchanges is inconsistent with the County's Title VI obligations to provide meaningful access to LEP community members. Community members must be informed, in their preferred language, when they are communicating through an AI-assisted translation tool rather than a human interpreter, and must be offered the option to decline and wait for a qualified interpreter instead. This disclosure should occur at the outset of the interaction.

Departments seeking to pilot or adopt AI-assisted language tools must notify and coordinate with OAO prior to implementation. Departments must maintain a record of known or reported AI translation errors and provide this information to OAO as part of ongoing evaluation of the tool's continued use. OAO will evaluate proposed uses for consistency with the County's language access obligations and provide guidance on appropriate parameters for use.

Prior to approving any AI-assisted language tool, OAO will evaluate the vendor's data governance practices, including where conversation data is stored, whether the vendor uses interactions to train its models, and whether data is transmitted to or processed in servers located outside of the United States. Given the populations served, departments may not adopt an AI-assisted language tool without a contractual prohibition on the vendor's use of County interactions for model training, unless OAO determines an exception is warranted.

Washington County Website and Digital Accessibility Standards

Washington County's digital presence, including its website, online forms, documents, videos, and social media, must meet language access and accessibility standards that ensure LEP community members and individuals with disabilities can access County information and services. The following standards apply across all digital platforms and content:

Website Translation – The Washington County website provides site translation using Google Translate to support general understanding and ensure information is available in a wide range of languages, including languages not on the Safe Harbor list. Washinton County recognizes the limitations of this technology, as it does not replace professional translation of vital information and must not be the sole method for communicating any of the content types listed above. Departments must ensure human review when machine translation is used for public-facing content that affects rights, benefits, and/or safety.

The prompt translation of any page on the County's main website, look to the header of the web page for the Translate option, select a target language, and observe the translation of text within the main content area. Note that graphics and images using text may not be translated; please see the standards for text in images below.

Vital Webpages – Webpages containing vital information, including rights, benefits, eligibility, complaint procedures, emergency information, and public participation opportunities, must be professionally translated into all Safe Harbor languages rather than relying solely on automated translation. OAO will work with departments to identify and prioritize vital webpages for professional translation.

Online Forms and Digital Application – All online forms and digital applications must include a language assistance notice and a mechanism for individuals to request assistance in their preferred language before or during completion. Where feasible, online forms that collect information affecting rights, benefits, or eligibility should be available in Safe Harbor languages through professional translation rather than machine translation alone.

PDFs and Downloadable Documents – PDFs and downloadable documents that are vital documents must be professionally translated into all Safe Harbor languages and made available for download in those languages. All PDFs must be accessible, tagged for screen readers, with proper heading structure, sufficient color contrast, and readable font sizes. Scanned image PDFs that are not text-searchable are not accessible and must be remediated.

Videos and Captions – All County videos posted publicly must include accurate caption in English. For videos containing vital information, captions or subtitles in Safe Harbor languages must be provided where feasible. Auto-generated captions are not sufficient for vital content and must be reviewed and corrected by a qualified individual before publication.

Social Media – Social media posts containing vital information, including emergency notices, rights information, public meeting announcements, and benefit or service access information, must include language access considerations. Where feasible, posts should be available in the most prevalent Safe Harbor languages for the intended audience. Emergency social media posts must be treated with the same urgency as other emergency communications.

Emergency Banners and Alerts – Emergency banners on the County website and digital platforms must include multilingual messaging in Safe Harbor languages. Pre-translated emergency banner templates must be maintained and ready for immediate deployment.

Alt Text and Image Accessibility – All images posted on County digital platforms must include descriptive alt text that conveys the meaning and content of the image for individuals using screen readers. Alt text must be written in plain language and must not simply repeat the image file name.

Avoiding Text Embedded in Images – Departments must avoid embedding text within images wherever possible. Text embedded in images cannot be translated by automated tools, is not readable by screen readers, and creates barriers for both LEP community members and individuals with visual disabilities. Where text in images is unavoidable, the same information must be provided in accessible text format adjacent to or below the image.

Section 15: Complaint and Compliance

Washington County's language access and civil rights obligations extend beyond the County's own departments and staff to all contractors, vendors, nonprofit partners, and subrecipients that provide County-funded services or operate programs supported by federal financial assistance. These entities are required to comply with applicable civil rights laws, including Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, and language access requirements, as a condition of receiving County funding or entering into a county contract or agreement.

All contracts, grants, and subrecipient agreements, must include standard nondiscrimination and language access provisions requiring compliance with applicable federal and state civil rights obligations. Contractors and subrecipients must ensure that their staff are trained on language access obligations, that interpretation and translation services are available to LEP individuals they serve, and that complaint procedures are in place and accessible.

OAO and the Civil Rights Officer are responsible for monitoring subrecipient compliance and may conduct compliance reviews, request documents, or require corrective action where deficiencies are identified. Failure to comply with these requirements may result in corrective action, suspension of funding, or termination of the contract or agreement.

Right to File a Complaint

Anyone who believes they have been excluded from participating in activities or programs, received unequal treatment, or experienced discrimination in the receipt of benefits or services based on race, color, or national origin (including limited English proficiency), has the right to file a Title VI discrimination complaint with the Office of Access and Opportunity. This right applies to community members, program participants, employees, and any individual who interacts with County programs, services, or activities.

Washington County strictly prohibits retaliation against any individual who files a complaint, participates in a complaint investigation, or reports a potential civil rights violation in good faith. Retaliation in any form, including adverse treatment, intimidation, threats, or interference, is a separate civil rights violation and will be treated as such.

Complaint Intake and Resolution Process

Complaints may be filled in any of the following ways:

- ***In Writing* –** sending an email to OAO, OAO's Director, or OAO's Civil Rights Officer, or by using OAO's complaint form located on the OAO website. OAO email: oao@washingtoncountyor.gov
- ***Verbally* –** by calling OAO directly; staff will document the complaint on behalf of the individual and read it back for confirmation. OAO phone number: 503-846-8685

- ***Online –*** through the County's web-based complaint intake form via EthicsPoint
- ***In Person –*** by visiting the Office of Access and Opportunity at 155 N. First Ave, Hillsboro, OR 97124

Complaints must be filed within 180 days of the alleged discriminatory act or the date the complainant became aware of the alleged discrimination. OAO will make reasonable accommodations for individuals who need assistance filing a complaint due to language, disability, or other access needs.

Complaint Processing Timeline

- ***Acknowledgement –*** OAO will acknowledge receipt of a complaint within five business days of intake
- ***Initial Assessment –*** OAO will conduct an initial assessment within 15 business days to determine whether the complaint falls within OAO's jurisdiction and whether it states a viable claim
- ***Investigation or Resolution –*** Complaints accepted for investigation will be assigned to the Civil Rights Officer or designee, and the Civil Rights Officer or designee may collaborate with County Counsel if deemed necessary. OAO will aim to complete the investigations within 90 business days of acceptance, absent extenuating circumstances. The complainant will be notified of the status of the investigation every 30 business days
- ***Interim Mitigation –*** Where an ongoing civil rights harm is identified during intake or investigation, OAO may implement interim mitigation measures to prevent continued harm while the investigation is pending
- ***Resolution –*** Complaints may be resolved through informal resolution, corrective action, or formal investigation findings. All resolutions will be documented in writing and communicated to the complainant
- ***Appeal and Review –*** If a complainant is dissatisfied with the outcome of OAO's complaint resolution, they may request a supervisory review by submitting a written request to the OAO Director within 15 days of receiving the resolution. Complainants also retain the right to file complaints directly with relevant federal agencies, including the U.S. Department of Justice, the U.S. Department of Transportation, or any other applicable oversight agencies at any given time

Documentation, Tracking, and Trend Reporting

All complaints will be logged in a secure complaint tracking system maintained by OAO. The complaint log will include the name of the complainant, basis of the complaint, date of filing, date of acknowledgement, investigation status, resolution outcome, and any corrective actions taken. OAO will analyze complaint data quarterly to identify trends, recurring access barriers, and systemic issues. Trend findings will be incorporated into the annual Language Access Report, shared with department directors and County leadership, and used to inform updates to

the Language Access Framework, training content, and departmental corrective action planning. The complaint log will be made available to federal oversight agencies upon request.

Appendix A: Department Language Access Plan Template

Department Information:

Department Name:

_____

Department Director:

_____

Date of Plan Completion:

_____

Date of Last Review:

_____

Next Scheduled Review Date:

_____

OAO Review and Approval Date:

_____

Section 1: Department Overview and Public-Facing Services
Provide a brief description of your department's mission, the populations you serve, and the primary programs, services, and activities that involve direct contact with members of the public.

Department Mission:

_____

_____

_____

Primary Programs and Services:

_____

_____

_____

Public-Facing Service Points (list all locations, counters, phone lines, websites, and digital platforms where the public interacts with your department):

_____

_____

_____

Estimated number of community members served annually:

_____

Estimated percentage of interactions involving LEP individuals:

_____

Section 2: Language Access Lead and Backup Contact

Language Access Lead

Name:

_____

Title:

_____

Phone:

_____

Email:

_____

Date of Designation:

_____

Date OAO was notified of designation:

_____

Backup Language Access Contact
Name:

_____

Title:

_____

Phone:

_____

Email:

_____

Section 3: Programs, Services, and Service Points

List each program or service your department provides and identify where and how community members access it. Note which service points involve the highest frequency of LEP encounters.

Program / Service	Service Point / Location	Modality	Estimated LEP Encounter Frequency

Section 4: Languages Most Commonly Encountered

List the languages most frequently encountered by your department. Note whether each language is a Safe Harbor language, a Department Priority Language, or both.

Language	Safe Harbor / Priority / Both	Primary Service Point(s)	Data Source

Section 5: Four-Factor Analysis Summary

Complete the Four-Factor Analysis using the worksheet in Appendix C. Summarize your findings below.

Factor 1 — Number and proportion of LEP individuals eligible to be served or likely to be encountered:

_____

_____

Factor 2 — Frequency with which LEP individuals come into contact with your programs or services:

_____

_____

Factor 3 — Nature and importance of the program, activity, or service to people's lives:

_____

_____

Factor 4 — Resources available and costs:

_____

_____

Overall Assessment and Conclusions:

_____

_____

Based on this analysis, the languages for which this department will proactively provide interpretation and translation services are:

_____

_____

Section 6: Vital Document Inventory

List all documents your department has identified as vital. Use the Vital Document Inventory template in Appendix D for the full inventory.

Document Name	Document Type	Safe Harbor Languages Translated	Translation Status	Date of Last Review	Document Owner

Are all vital documents currently translated into all 11 Safe Harbor languages?

☐ Yes ☐ No ☐ In Progress

If not, describe the plan and timeline for completing outstanding translations:

_____

_____

Section 7: Translation Plan

Describe how your department manages written translation needs, including who initiates translation requests, which vendors are used, how quality control is maintained, and how the department ensures translated documents are current.

Translation request process:

_____

_____

Vendors used for written translation:

_____

How plain language review is completed before translation submission:

_____

_____

How human review of translated documents is ensured:

_____

_____

How version control and date of last review are tracked:

_____

How the department is notified when the English version of a document changes:

_____

Estimated annual translation volume and budget:

_____

Section 8: Interpretation Procedures

Describe how your department ensures qualified interpretation is available for all LEP interactions, including front desk, phone, field, and virtual encounters.

How staff initiate interpretation requests:

_____

_____

Vendors used for telephonic interpretation:

_____

Vendors used for video remote interpretation:

_____

Vendors used for in-person interpretation:

_____

How ASL and CDI requests are handled:

_____

_____

How after-hours interpretation needs are addressed:

_____

_____

How the department ensures bilingual staff are used within guardrails:

_____

_____

How interpretation needs are documented and tracked:

_____

Section 9: Public Meeting and Engagement Procedures

Describe how your department ensures LEP community members can meaningfully participate in public meetings, hearings, town halls, and community engagement events.

How interpretation needs for public meetings are assessed in advance:

_____

_____

How interpretation is arranged and what modalities are available:

_____

_____

How multilingual public meeting notices are produced and distributed:

_____

_____

How community members are informed of the availability of free interpretation:

_____

How feedback from LEP participants is collected and incorporated:

_____

_____

Section 10: Emergency Communication Procedures

Describe how your department ensures LEP community members receive timely and accurate language access during emergencies and life safety events.

How this department accesses and uses the countywide pre-translated emergency template library maintained through OAO and Emergency Management:

_____

_____

How this department accesses the countywide after-hours vendor protocol for interpretation and translation services during activations:

_____

_____

How multilingual emergency alerts are issued for this department's incidents, including use of OAO-provided language blocks:

_____

_____

How multilingual shelter and evacuation signage is maintained for this department's facilities or response areas:

_____

How this department's PIO staff coordinates with the Lead PIO and OAO during activations:

_____

_____

How this department applies the Language Access Framework's guidance on resource and feasibility limitations, including when machine translation may be used, when full multilingual coverage is not immediately feasible:

_____

_____

Section 11: Digital and Webpage Language Access Plan

Describe how your department ensures its digital presence meets language access and accessibility standards.

Vital webpages identified for professional translation:

_____

_____

Status of professional translation for vital webpages:

_____

How online forms accommodate LEP users:

_____

_____

How PDFs are made accessible and translated:

_____

_____

How videos are captioned and whether Safe Harbor language subtitles are available:

_____

How social media posts involving vital information are handled:

_____

_____

How the department avoids text embedded in images:

_____

How alt text is applied to images:

_____

Section 12: Staff Training Plan

Describe how your department ensures all staff complete required language access training at the appropriate level.

Staff Category	Required Training Level	Training Completion Deadline	Tracking Method

How does the department track and report training completion to OAO?

_____

_____

What is the plan for onboarding new staff into language access training requirements?

_____

_____

Section 13: Vendor Use and Billing Process

Describe how your department accesses and manages OAO-approved interpretation and translation vendors.

How staff access the approved vendor list:

_____

Billing codes and account information for interpretation requests:

_____

Billing codes and account information for translation requests:

_____

Who in the department is authorized to approve vendor invoices:

_____

How vendor performance issues are reported to OAO:

_____

_____

Section 14: Complaint Referral Process

Describe how your department ensures community members who experience language access barriers or civil rights violations are connected to the appropriate complaint process.

How staff are trained to recognize a potential language access complaint:

_____

_____

How staff refer community members to OAO for complaint intake:

_____

_____

OAO Contact Information

- Phone: 503-846-8685
- Email: civilrights@washingtoncountyor.gov
- Address: 155 N First Ave, Hillsboro, OR 97124

How the department documents and tracks complaint referrals:

_____

_____

Section 15: Data Reporting Plan

Describe how your department collects, tracks, and reports language service usage data to OAO.

What data is tracked (language, service type, vendor, cost, turnaround time, date):

_____

_____

How data is collected and stored:

_____

_____

Who is responsible for data collection and submission:

_____

Reporting frequency and submission process to OAO:

_____

How data findings are used to inform department language access planning:

_____

_____

Section 16: Gaps, Risks, and Corrective Actions

Identify any known gaps in your department's current language access capacity, associated risks, and planned corrective actions.

Gap or Risk Identified	Associated Civil Rights Risk	Planned Corrective Action	Timeline	Status

Are there any programs or service points where language access obligations are currently not being fully met?

☐ Yes ☐ No

If yes, describe the gap and the corrective action plan:

_____

_____

Has OAO been notified of any identified gaps?

☐ Yes ☐ No ☐ In Progress

Department Director Certification

I certify that this Department Language Access Plan has been reviewed and approved by department leadership and accurately reflects our department's current language access practices, identified gaps, and planned improvements. I understand that this plan must be submitted to OAO for review and approval and reviewed and updated on a biannual basis.

Department Director Signature:

_____

Printed Name:

_____

Date:

_____

OAO Review and Approval
Reviewed by:

_____

Title:

_____

Date of Review:

_____

Date of Approval:

_____

Notes:

Appendix B: Washington County Language Access Signage and Wayfinding Checklist

PURPOSE

This appendix establishes minimum operational standards and review procedures for language access signage, interpreter availability notices, multilingual wayfinding, and public-facing accessibility measures within Washington County facilities. Additionally, this appendix supports implementation of the Washington County Language Access Plan (LAP) and is intended to help ensure that community members entering County facilities can reasonably:

- Identify where to go
- Navigate public spaces
- Request interpretation or translation services
- Understand that language assistance is available free of charge
- Access services regardless of English proficiency
- Access emergency and safety information
- Identify accessibility accommodations

This applies to all public-facing Washington County facilities, including:

- Reception areas
- Front desks
- Service counters
- Waiting rooms
- Public meeting areas
- Community engagement spaces
- Program offices
- Shared County facilities
- Temporary public service locations when applicable

This appendix should be used during:

- Facility reviews
- Department LAP implementation reviews
- New facility openings
- Public-facing remodels or redesigns
- ADA accessibility reviews
- OAO audits or assessments
- Signage replacement projects
- Emergency preparedness reviews

GOVERNANCE, RESPONSIBILITY, AND OVERSIGHT

Departmental Language Access Responsibility

Each Washington County department or division serving the public shall designate a Departmental Language Access Point of Contact (LAPC) or Language Access Lead responsible for supporting implementation of language access requirements within their operational areas.
Departmental Language Access Leads may be responsible for:

- Monitoring public-facing language access needs
- Identifying signage deficiencies or gaps
- Coordinating requests for translated signage or materials
- Ensuring interpreter availability notices remain visible
- Maintaining availability of I Speak Cards
- Coordinating with supervisors regarding operational language access concerns
- Supporting staff awareness and implementation efforts
- Coordinating with the Office of Access & Opportunity (OAO)
- Participating in periodic assessments or audits

Office of Access & Opportunity (OAO) Oversight

The OAO Language Access Program Coordinator shall provide Countywide guidance, oversight, technical assistance, and compliance support regarding implementation of this appendix and the Washington County Language Access Plan.
OAO responsibilities may include:

- Developing Countywide language access guidance and standards
- Supporting consistency across County facilities
- Assisting departments with multilingual signage recommendations
- Supporting translation prioritization decisions
- Providing technical assistance related to interpreter availability notices and multilingual wayfinding
- Monitoring recurring language access concerns or deficiencies
- Conducting periodic reviews or audits
- Supporting corrective action planning where needed
- Coordinating Countywide language access best practices

Facilities Department Responsibility

Washington County Facilities Services shall remain responsible for the physical installation, mounting, relocation, replacement, or removal of permanent signage attached to County property, buildings, fixtures, or infrastructure.
Facilities-related responsibilities may include:

- Installation of approved permanent signage
- ADA-compliant mounting and placement
- Physical replacement of damaged signs
- Coordination regarding building standards and placement requirements
- Ensuring signage installation does not interfere with life safety systems or ADA access requirements
- Supporting facility wayfinding consistency where operationally feasible

Departments should coordinate with Facilities Services regarding permanent signage installation requests. Nothing in this appendix authorizes departments to independently mount permanent signage to County property without applicable coordination or approval.

FRONT DESK AND RECEPTION ACCESS

Language Assistance Visibility

☐ "Interpreter Services Available Free of Charge" signage visibly posted
☐ Language assistance signage placed at primary public entrances
☐ Language assistance signage visible at reception counters and public service windows
☐ Signage visible from waiting areas
☐ Signage includes multiple commonly encountered languages where appropriate
☐ Signage uses plain language
☐ Signage uses readable font size and high-contrast formatting
☐ Signage includes interpretation icons or pictograms where feasible
☐ Signage placement unobstructed by furniture, notices, or decorations

iSpeak Cards

☐ iSpeak Cards available at all public-facing counters
☐ Staff know where I Speak Cards are located
☐ Staff understand how to use I Speak Cards
☐ iSpeak Cards accessible without requiring customer request
☐ Durable or laminated copies available where feasible
☐ Digital versions available where operationally appropriate

Interpreter Access Readiness

☐ Staff understand how to request interpreter services
☐ Staff understand telephonic interpretation procedures
☐ Staff understand video remote interpretation procedures
☐ Staff know how to access translated documents
☐ Staff understand prohibition on using minors as interpreters except in limited emergency circumstances
☐ Escalation procedures exist if interpreter services are delayed or unavailable

WAYFINDING AND NAVIGATION SIGNAGE

Interior Wayfinding

☐ Major service areas clearly identified
☐ Directional signs use plain language
☐ Signs include pictograms/icons where feasible
☐ Restrooms, exits, elevators, and reception areas clearly marked
☐ Public meeting rooms clearly identified

☐ Public-facing counters clearly labeled
☐ Signage readable from appropriate distance
☐ Signage terminology consistent throughout facility
☐ High-priority service areas translated where appropriate
☐ Signs placed at major decision points or directional changes

Exterior Wayfinding
☐ Main public entrances clearly identified
☐ Accessible entrances clearly marked
☐ Public parking areas clearly identified
☐ Employee-only areas distinguishable from public entrances
☐ Temporary closures or reroutes posted in multiple languages when appropriate
☐ Exterior signage visible and readable

INTERPRETER AVAILABILITY NOTICES
Public Notification Standards
☐ Notices clearly state interpretation services are available free of charge
☐ Notices translated into commonly encountered languages where appropriate
☐ Notices posted at:
- Entrances
- Reception counters
- Waiting areas
- Service windows
- Public meeting rooms

☐ Notices include instructions for requesting assistance
☐ Notices include accessibility accommodation information when applicable
☐ Notices use culturally neutral and respectful language

Digital Language Access Tools
☐ QR codes available where operationally appropriate
☐ QR codes tested and functional
☐ Mobile-accessible language access information available
☐ Digital displays updated regularly where applicable
☐ Public-facing kiosks include multilingual support where feasible

EMERGENCY SIGNAGE AND SAFETY INFORMATION

Emergency Preparedness Language Access
☐ Emergency exits clearly marked
☐ Emergency instructions use pictograms/icons where feasible
☐ Critical emergency signage translated where appropriate

☐ Evacuation instructions accessible and understandable
☐ Shelter-in-place instructions accessible
☐ Emergency assembly locations identified
☐ Emergency multilingual notices available for rapid deployment
☐ Emergency communication planning includes LEP considerations
☐ Staff understand emergency language access procedures

ICONS, PICTOGRAMS, AND UNIVERSAL SYMBOLS

☐ Internationally recognized symbols used where feasible
☐ Icons used consistently throughout facility
☐ Restroom symbols clearly visible
☐ Accessibility symbols compliant with ADA standards
☐ Interpretation/language assistance symbols visible
☐ Pictograms supplement text-based communication where feasible
☐ Symbols understandable regardless of language proficiency

ADA VISIBILITY, CONTRAST, AND PLACEMENT STANDARDS

Accessibility and Readability

☐ High-contrast color combinations used
☐ Fonts clear and readable
☐ Font sizes appropriate for viewing distance
☐ Non-glare materials used where feasible
☐ Braille signage installed where required
☐ ADA tactile signage installed where required
☐ Signage mounted at ADA-compliant height where applicable
☐ Signage lighting adequate for visibility
☐ Temporary signage does not obstruct accessibility features
☐ Pathways to signage remain unobstructed

Sign Placement Standards

☐ Signs positioned at major decision points
☐ Directional signs placed before directional changes
☐ Front desk signage visible immediately upon entry
☐ Language assistance notices visible without requiring staff interaction
☐ Signage placement consistent throughout facility

TRANSLATED MATERIALS ACCESSIBILITY

☐ Vital translated documents available at reception or service counters where applicable
☐ Public forms translated where required under County policy or law
☐ Community members informed of translation request procedures

☐ Language access complaint information visible
☐ Printed translated materials stocked appropriately
☐ Outdated translated materials removed

COMMUNITY EXPERIENCE REVIEW
Can a community member reasonably:
Identify where to go?
☐ Yes ☐ No
Request language assistance easily?
☐ Yes ☐ No
Understand that interpreter services are free?
☐ Yes ☐ No
Navigate the facility independently?
☐ Yes ☐ No
Identify emergency exits and safety information?
☐ Yes ☐ No
Access translated materials if needed?
☐ Yes ☐ No
Locate accessibility accommodations if needed?
☐ Yes ☐ No

DEFICIENCIES AND CORRECTIVE ACTIONS
Deficiency Identified:

Corrective Action Needed:

Responsible Party:

Target Completion Date:

Deficiency Identified:

Corrective Action Needed:

Responsible Party:

Target Completion Date:

PERIODIC REVIEW REQUIREMENTS

Departments should periodically review public-facing language access signage and wayfinding systems to ensure:

- Interpreter notices remain visible
- I Speak Cards remain available
- QR codes remain functional
- Signage remains accurate and readable
- ADA visibility standards remain maintained
- Emergency signage remains current
- Public-facing language access information remains understandable and accessible

Recommended Review Frequency:
☐ Quarterly
☐ Semi-Annually
☐ Annually
☐ Other: _____

FINAL REVIEW
Overall Compliance Status:
☐ Meets Expectations
☐ Partially Meets Expectations
☐ Needs Corrective Action

Additional Notes:

Department Reviewer:

Date:

OAO Reviewer (If Applicable):

Review Date:

Follow-Up Required?
☐ Yes ☐ No
Follow-Up Date:

OPERATIONAL NOTES
Language assistance services must be provided free of charge to community members. Departments shall not rely solely on bilingual family members, friends, or minors for interpretation except in limited emergency circumstances consistent with applicable law and County policy. Departments are encouraged to coordinate with the Office of Access & Opportunity (OAO) regarding multilingual signage standards, translation priorities, accessibility concerns, and wayfinding improvements. iSpeak Cards and federally required public language assistance notices should remain visible and accessible in public-facing service areas.

Permanent signage installation, mounting, relocation, or removal on County property shall be coordinated through Washington County Facilities Services in accordance with applicable County facility standards and procedures.

Appendix C: Washington County Four-factor Analysis Worksheet

PURPOSE
This worksheet assists Washington County departments and divisions in evaluating language access needs in accordance with:

- Title VI of the Civil Rights Act of 1964
- Federal LEP Guidance
- Washington County Administrative Policies
- Washington County Language Access Framework (2026)

Departments shall complete this assessment to determine:

- Language assistance needs
- Translation priorities
- Interpretation service requirements
- Operational gaps
- Resource allocation needs
- Compliance risks

This worksheet should be reviewed:

- Annually
- During major program changes
- Following significant demographic shifts
- After community feedback indicating access barriers
- At the request of the Office of Access & Opportunity (OAO)

DEPARTMENT INFORMATION
Department/Division: _____
Program or Service Reviewed: _____
Assessment Date: _____
Assessment Completed By: _____
Supervisor/Manager: _____
OAO Language Access Lead Consulted? ☐ Yes ☐ No
Geographic Area Served: _____
Assessment Period Reviewed: _____

FACTOR 1 - NUMBER OR PROPORTION OF LEP INDIVIDUALS SERVED
Purpose
Evaluate the number and percentage of Limited English Proficient (LEP) individuals who may encounter the program, service, or activity.

Data Sources Used (Check All That Apply)

☐ Census Data
☐ ACS Data
☐ Internal Service Logs
☐ Interpreter Request Logs
☐ Community Partner Feedback
☐ School District Data
☐ Community Engagement Feedback
☐ Other: _____

Languages Encountered
Language: _____
Estimated Number Served: _____
Estimated Percentage of Population Served: _____
Data Source: _____
Emerging Need? ☐ Yes ☐ No

Language: _____
Estimated Number Served: _____
Estimated Percentage of Population Served: _____
Data Source: _____
Emerging Need? ☐ Yes ☐ No

Language: _____
Estimated Number Served: _____
Estimated Percentage of Population Served: _____
Data Source: _____
Emerging Need? ☐ Yes ☐ No

Safe Harbor Threshold Evaluation
Does any LEP language group exceed 5% or 1,000 persons served?
☐ Yes ☐ No
Are vital documents translated into required languages?
☐ Yes ☐ No
Are additional translations recommended?
☐ Yes ☐ No

Factor 1 Risk Rating:
☐ Low — Small LEP population with limited contact
☐ Moderate — Noticeable LEP population requiring periodic assistance
☐ High — Significant LEP population regularly accessing services

Notes / Findings:

FACTOR 2 - FREQUENCY OF CONTACT WITH LEP INDIVIDUALS

Purpose

Evaluate how often LEP individuals interact with the program or service.

Frequency of Interaction

In-Person Visits:

☐ Daily ☐ Weekly ☐ Monthly ☐ Rare

Notes: _____

Telephone Contact:

☐ Daily ☐ Weekly ☐ Monthly ☐ Rare

Notes: _____

Email Communication:

☐ Daily ☐ Weekly ☐ Monthly ☐ Rare

Notes: _____

Public Meetings / Events:

☐ Daily ☐ Weekly ☐ Monthly ☐ Rare

Notes: _____

Emergency Interactions:

☐ Daily ☐ Weekly ☐ Monthly ☐ Rare

Notes: _____

Interpretation Usage

Are interpreters requested regularly?

☐ Yes ☐ No

Are bilingual staff frequently utilized?

☐ Yes ☐ No

Are delays occurring in obtaining language services?

☐ Yes ☐ No

Are some language requests going unmet?

☐ Yes ☐ No

Factor 2 Risk Rating:

☐ Low — Rare LEP interaction

☐ Moderate — Periodic LEP interaction

☐ High — Frequent or daily LEP interaction

Notes / Findings:

FACTOR 3 - NATURE AND IMPORTANCE OF THE PROGRAM OR SERVICE

Purpose

Evaluate the consequences to LEP individuals if language access is unavailable or delayed.

Program Impact Assessment

Does the program affect health or safety?

☐ Yes ☐ No

Does the program affect legal rights?

☐ Yes ☐ No

Does the program impact housing stability?

☐ Yes ☐ No

Does the program affect financial assistance or benefits?

☐ Yes ☐ No

Could delayed communication create significant harm?

☐ Yes ☐ No

Is the service required to access County services?

☐ Yes ☐ No

Service Criticality Rating

☐ Low — Limited impact if delayed

☐ Moderate — Important public service

☐ High — Critical or life/safety-related service

Notes / Findings:

FACTOR 4 - RESOURCES AVAILABLE AND COST CONSIDERATIONS

Purpose

Evaluate available language access resources, operational capacity, and reasonable accommodation measures.

Existing Resources

Contract interpretation services available?

☐ Yes ☐ No

Translation vendors available?

☐ Yes ☐ No

Bilingual staff available?

☐ Yes ☐ No

Telephonic interpretation available?

☐ Yes ☐ No

Video remote interpretation available?

☐ Yes ☐ No

Translated vital documents available?
☐ Yes ☐ No
Multilingual signage available?
☐ Yes ☐ No

Operational Limitations
Budget Constraints:

Staffing Limitations:

Technology Limitations:

Vendor Limitations:

Rural Service Barriers:

Emergency Response Limitations:

Factor 4 Risk Rating:
☐ Low — Adequate resources available
☐ Moderate — Some resource limitations
☐ High — Significant resource gaps impacting access

Notes / Findings:

FOUR-FACTOR DETERMINATION
Overall Assessment Summary
Factor 1 Rating: ☐ Low ☐ Moderate ☐ High
Factor 2 Rating: ☐ Low ☐ Moderate ☐ High
Factor 3 Rating: ☐ Low ☐ Moderate ☐ High
Factor 4 Rating: ☐ Low ☐ Moderate ☐ High

Overall Language Access Risk Level
☐ Low
☐ Moderate
☐ High

Required or Recommended Actions
Action Item: _____
Responsible Party: _____
Timeline: _____

Action Item: _____
Responsible Party: _____
Timeline: _____

Action Item: _____
Responsible Party: _____
Timeline: _____

Translation Priorities Identified
Document/Material: _____
Language(s) Needed: _____
Priority Level: ☐ Low ☐ Moderate ☐ High

Document/Material: _____
Language(s) Needed: _____
Priority Level: ☐ Low ☐ Moderate ☐ High

Interpretation Needs Identified
Service/Event Type: _____
Language Support Needed: _____
Notes: _____

Service/Event Type: _____
Language Support Needed: _____
Notes: _____

OAO REVIEW (IF APPLICABLE)
OAO Reviewer: _____
Review Date: _____
Additional Recommendations:

Corrective Action Required? ☐ Yes ☐ No
Follow-Up Review Date: _____

OPERATIONAL NOTES
Completion of this worksheet does not replace ongoing departmental responsibility to provide meaningful language access services. Departments are expected to continuously monitor service trends, community feedback, interpreter utilization, and demographic changes to ensure compliance with County policy and applicable civil rights requirements.
Cost alone shall not be used as the sole basis for denying reasonable language access accommodations when required under applicable law or County policy.

Appendix D: Language Access Lead Role Description

Title: Language Access Lead (also referred to as Language Access Liaison)

Designation: Each Washington County department must designate at least one Language Access Lead. The Language Access Lead is not a separate classified position, but a designated responsibility assigned to an existing staff member by the department director. The designation must be documented and communicated to OAO within 30 days of Framework adoption or whenever a new Lead is appointed.

Purpose
The language Access Lead serves as the primary point of contact between their department and the Office of Access and Opportunity on all matters related to language access implementation, compliance, and reporting. The Lead ensures that their department's language access obligations are understood, operationalized, and consistently maintained in alignment with the Washington County Language Access Framework and applicable civil rights requirements.

Core Responsibilities

- Serve as the department's primary contact for OAO on language access matters including compliance monitoring, corrective action, and reporting
- Coordinate the development, implementation, and biannual review of the Department Language Access Plan
- Maintain the department's vital document inventory and ensure vital documents are translated into Safe Harbor languages and updated when the English version changes
- Ensure department staff have access to OAO-approved vendor lists, billing procedures, and language access tools including iSpeak cards, language blocks, and signage
- Track and report language service usage data, including interpretation and translation requests by language, modality, vendor, and cost, to OAO on the schedule established in the Framework
- Serve as the first point of escalation when a community member requests language assistance and staff are uncertain how to proceed
- Connect community members to OAO when civil rights complaints are identified or when a language access need cannot be met at the department level
- Participate in OAO-facilitated Language Access convenings, trainings, and working groups
- Support department staff in completing required language access training at the appropriate level
- Document community consultation efforts and submit findings to OAO as part of the annual Language Access Plan review
- Notify OAO of any significant changes to department programs, services, or communications that may affect language access obligations

Authority and Limitations

The Language Access Lead does not hold final authority over civil rights compliance determinations. The Lead's role is operational and coordinative. Where compliance questions arise that exceed the Lead's knowledge or authority, the Lead must escalate to OAO and the Civil Rights Officer promptly.

Qualifications
There are no formal credentialing requirements for the Language Access Lead designation. However, the designated individual should have sufficient familiarity with the department's programs and services, access to department leadership, and the capacity to coordinate across staff and with OAO. OAO will provide orientation training and ongoing support to all designated Language Access Leads.

Time Commitment
The time commitment for the Language Access Lead function will vary by department size, LEP encounter frequency, and the department's current stage of Language Access Plan development. Departments should account for this responsibility in the Lead's workload planning.

Support Available
OAO will provide all Language Access Leads with access to the Department LAP template, vital document inventory template, vendor instructions, training materials, decisions guides, checklists, and the Language Access Lead orientation. OAO will also convene periodic meetings with Language Access Leads to share updates, address common challenges, and build capacity across departments.

Reporting Relationship
The Language Access Lead reports on language access matters to OAO and the Civil Rights Officer. Within the department, the Lead operates under the direction of the department director or their designee.

Appendix E: Annual Language Access Report Template

Report Information

Department Name:

_____

Language Access Lead:

_____

Reporting Period (Fiscal Year):

_____

Date of Submission:

_____

OAO Reviewer:

_____

Date of OAO Review:

_____

Section 1: Language Access Lead and Staffing Update

Has there been a change in the Language Access Lead since the last reporting period?

☐ Yes ☐ No

If yes, provide the name and contact information of the new Lead and the date OAO was notified:

_____

_____

Are there any staffing changes that have affected the department's language access capacity?

☐ Yes ☐ No

If yes, describe:

_____

_____

Section 2: Language Service Utilization Data

Provide data on all interpretation and translation services used during the reporting period.

Interpretation Services

Language	# of Requests	Modality	Vendor Used	Total Cost	Avg. Duration

Translation Services

Language	# of Documents	Document Type	Vendor Used	Total Cost	Turnaround Time

Were there any instances where language services could not be provided promptly?
☐ Yes ☐ No
If yes, describe the circumstances and how the situation was resolved:
_____
_____

Section 3: Vital Document Inventory Update

Total number of vital documents identified by this department:
_____
Number of vital documents currently translated into all 11 Safe Harbor languages:
_____
Number of vital documents with outstanding translations:
_____

Document Name	Languages Still Needed	Reason for Gap	Planned Completion Date

Were any vital documents updated in English during this reporting period?
☐ Yes ☐ No
If yes, were translations updated accordingly?
☐ Yes ☐ No ☐ In Progress
Describe any outstanding translation updates needed and the plan to complete them:
_____
_____

Section 4: Staff Training Completion

Staff Category	Total Staff	# Completed	Completion Rate	Training Date(s)

Were there any staff categories that did not meet the training completion target?
☐ Yes ☐ No
If yes, describe the gap and the plan to address it:
_____
_____
How is training completion tracked and documented in this department?
_____
_____

Section 5: Department Language Access Plan Status

Is the Department Language Access Plan current and up to date?
☐ Yes ☐ No ☐ Under Review
Date of most recent LAP review:
_____

Date LAP was last submitted to OAO for approval:

_____

Were any significant changes made to the LAP during this reporting period?

☐ Yes ☐ No

If yes, describe the changes and whether OAO was notified:

_____

_____

Are there any sections of the LAP that require updating based on this reporting period's findings?

☐ Yes ☐ No

If yes, describe:

_____

_____

Section 6: Community Consultation Activities

Describe all community consultation activities conducted during this reporting period.

Consultation Activity	Date	Format	Participants / Organizations	Key Findings

How was community feedback incorporated into language access planning or service delivery during this period?

_____

_____

Were there any recurring concerns or access barriers identified through community consultation?

☐ Yes ☐ No

If yes, describe and note any corrective actions taken or planned:

_____

_____

Section 7: Complaint and Referral Activity

Number of language access complaints received directly by this department during this reporting period:

_____

Number of individuals referred to OAO for civil rights complaint intake:
_____

Complaint / Referral Date	Nature of Complaint or Referral	Outcome or Status

Were there any patterns or recurring issues identified in complaint or referral data?
☐ Yes ☐ No
If yes, describe and note any corrective actions taken or planned:
_____
_____

Section 8: Vendor Performance

Were there any vendor performance issues during this reporting period?
☐ Yes ☐ No
If yes, describe the issue, the vendor involved, and whether it was reported to OAO:

Vendor Name	Issue Description	Date Reported to OAO	Resolution Status

Were there any gaps in language coverage — languages requested that vendors could not fulfill?
☐ Yes ☐ No
If yes, identify the languages and how the need was addressed:
_____
_____

Section 9: Digital and Web Accessibility Update

Were any new public-facing webpages, online forms, PDFs, or digital materials created or updated during this reporting period?
☐ Yes ☐ No
If yes, were language access and accessibility standards applied?
☐ Yes ☐ No ☐ In Progress
Are there any digital materials that remain inaccessible or untranslated that were identified this period?
☐ Yes ☐ No
If yes, describe and provide a remediation timeline:
_____
_____

Section 10: Emergency Communication Readiness

Are pre-translated emergency templates current and accessible to staff?
☐ Yes ☐ No ☐ In Progress
Is the after-hours vendor contact protocol documented and known to relevant staff?
☐ Yes ☐ No
Were there any emergency activations during this reporting period that required multilingual communication?
☐ Yes ☐ No
If yes, describe how language access was provided and any gaps identified:
_____
_____

Section 11: Gaps, Risks, and Corrective Actions
Identify any language access gaps, compliance risks, or corrective actions from this reporting period — including new gaps and the status of gaps reported in prior periods.

Gap or Risk	New or Ongoing	Civil Rights Risk	Corrective Action	Timeline	Status

Were any corrective action plans initiated or completed during this reporting period?

☐ Yes ☐ No
If yes, describe the outcome:

_____
_____

Section 12: Priorities and Goals for the Next Reporting Period
Based on this reporting period's findings, identify the department's top language access priorities for the coming year:

Priority 1:

_____
Priority 2:

_____
Priority 3:

_____

Are there any resource needs — staffing, budget, training, or tools — required to meet these priorities?
☐ Yes ☐ No
If yes, describe:

_____
_____

Department Director Certification
I certify that the information provided in this Annual Language Access Report is accurate and complete to the best of my knowledge and reflects the department's language access activities during the reporting period.

Department Director Signature:

_____
Printed Name:

_____
Date:

_____

OAO Review

Reviewed by:

_____
Title:

_____
Date of Review:

_____
Notes:

_____
_____

Appendix F: Language Access Training Checklist

Department Information

Department Name:

_____

Language Access Lead:

_____

Reporting Period:

_____

Date Submitted to OAO:

_____

All Staff — Foundational Training
Required for every Washington County employee

Staff Name	Job Title	Date Training Completed	Training Format	Verified By

This training covers:

- The County's legal obligations under Title VI and ADA
- What meaningful access means in practice
- How to recognize when a community member needs language assistance
- How to connect individuals to interpretation and translation services through approved vendors

Total staff in this category:

_____

Total completed:

_____

Completion rate:

_____

Are there staff who have not yet completed all staff — foundational training?

☐ Yes ☐ No

If yes, describe the plan and timeline:

_____

_____

Public-Facing Staff Training

Required for all staff who regularly interact with the public

Staff Name	Job Title	Date Training Completed	Training Format	Verified By

This training covers:

- How to use iSpeak cards, public notices, and language selection posters
- How to initiate interpretation requests through approved vendors
- How to respond when a community member requests language assistance or an ADA accommodation

Total staff in this category:

_____

Total completed:

_____

Completion rate:

_____

Are there staff who have not yet completed public-facing staff training?

☐ Yes ☐ No

If yes, describe the plan and timeline:

_____

_____

Supervisors and Managers Training

Required for all supervisory and management staff

Staff Name	Job Title	Date Training Completed	Training Format	Verified By

This training covers:

- Monitoring staff compliance with language access obligations
- Billing procedures for interpretation and translation services
- Responding to language access gaps identified through monitoring or complaints
- Supporting staff in implementing language access policies consistently

Total staff in this category:

_____

Total completed:

_____

Completion rate:

_____

Are there staff who have not yet completed supervisors and managers training?

☐ Yes ☐ No

If yes, describe the plan and timeline:

_____

_____

Language Access Lead Training

Required for all designated Language Access Leads

Staff Name	Job Title	Date Training Completed	Training Format	Verified By

This training covers:

- Developing and maintaining Department Language Access Plans
- Coordinating with OAO on compliance monitoring and reporting
- Tracking language service usage data

- Serving as the department's primary point of contact for language access implementation and corrective action

Total staff in this category:

_____

Total completed:

_____

Completion rate:

_____

Has the Language Access Lead completed OAO orientation?

☐ Yes ☐ No ☐ Scheduled

Overall Training Summary

Staff Category	Total Staff	Completed	Completion Rate	Gap
All Staff — Foundational				
Public-Facing Staff				
Supervisors and Managers				
Language Access Lead				
Overall Total				

Are there any departments or staff categories at significant risk of non-completion?

☐ Yes ☐ No

If yes, describe the corrective plan and timeline:

_____

_____

Language Access Lead Certification

I certify that the training completion information recorded in this checklist is accurate to the best of my knowledge.

Language Access Lead Signature:

_____

Printed Name:

_____

Date:

_____

OAO Use Only

Received by:

_____

Date Received:

_____

Compliance Status:

☐ Compliant ☐ In Progress ☐ Non-Compliant

Notes:

_____

_____

Appendix G: Language Access Emergency Communication Checklist

Used by department staff, Language Access Leads and Emergency Management coordinators to ensure language access obligations are met before, during, and after emergency and life safety events.

Department Information

Department Name:

_____

Language Access Lead:

_____

Emergency / PIO Contact:

_____

Date of Last Review:

_____

OAO Contact:
civilrights@washingtoncountyor.gov |503-846-8685

Part 1: Pre-Event Preparedness
Complete annually and update whenever emergency plans are revised.

Pre-Translated Emergency Templates

☐ Pre-translated emergency templates are maintained for the following event types:
☐ Evacuation
☐ Wildfire smoke
☐ Extreme heat / cold
☐ Boil water notice
☐ Sheltering in place
☐ Communicable disease
☐ Road closures
☐ Emergency benefits or service access
☐ Other: _____

☐ All pre-translated templates are available in all 11 Safe Harbor languages
☐ Templates have been reviewed and updated within the last 12 months
☐ Templates are stored in a location accessible to all staff responsible for emergency communications

Date of last template review:

_____

Location where templates are stored:

_____

After-Hours Vendor Protocol

☐ After-hours interpretation vendor contact information is documented and accessible to relevant staff

☐ All staff responsible for emergency communications know how to initiate an after-hours interpretation request

☐ After-hours protocol has been tested or reviewed within the last 12 months

Primary after-hours vendor contact:

_____

Backup vendor contact:

_____

Protocol location (where staff can find it):

_____

Language Access Lead and Staff Readiness

☐ Language Access Lead has completed Emergency / PIO language access training

☐ All emergency and public information staff have completed required language access training

☐ Staff know how to escalate to OAO if language access cannot be arranged promptly

Signage and Wayfinding

☐ Emergency shelter locations have multilingual signage in Safe Harbor languages

☐ Evacuation route signage includes multilingual and pictogram elements

☐ Service center locations have language selection posters or iSpeak cards available

☐ Signage has been reviewed and updated within the last 12 months

Digital and Social Media Readiness

☐ Emergency alert language blocks are ready for deployment on the County website

☐ Pre-translated emergency social media posts are prepared in Safe Harbor languages

☐ Emergency webpage banner templates are available in Safe Harbor languages

☐ PIO staff know the process for issuing multilingual digital alerts

Backup Process When Full Translation is Not Immediately Feasible

☐ A documented backup process exists for when full translation cannot be arranged in real time

☐ Backup process includes: bilingual staff deployment, telephonic interpretation, simplified multilingual messaging using pre-approved language blocks, and pictogram-based signage

☐ Backup process is documented in the Department Language Access Plan

Part 2: During an Emergency Activation

Complete at the time of activation.

Event Type:

_____

Date of Activation:

_____

Staff Member Completing This Checklist:

_____

Immediate Language Access Actions

☐ Pre-translated emergency templates identified and deployed
☐ Interpretation services activated for affected service points
☐ After-hours vendor contacted if activation occurs outside business hours
☐ Multilingual emergency alerts issued through available communication channels
☐ Multilingual signage deployed at shelter, evacuation, and service locations
☐ PIO notified to include multilingual messaging in all public communications
☐ Community distribution partners notified to assist with outreach to LEP communities
☐ OAO notified of activation and any language access needs that cannot be met

If Full Translation is Not Immediately Available

☐ Backup process initiated
☐ Simplified multilingual messaging using pre-approved language blocks deployed
☐ Pictogram-based signage deployed where applicable
☐ Bilingual staff deployed to highest-need service points
☐ OAO notified of the gap and the interim measures taken

Languages for which services were arranged during this activation:

_____

Languages for which services could not be arranged:

_____

Actions taken to address gaps:

_____

_____

Part 3: Post-Event Debrief

Complete within 30 days of the end of the emergency activation.

Language Access Performance Review

☐ Review of language access performance during the activation completed
☐ Gaps in language coverage identified and documented
☐ Gaps in signage, templates, or vendor availability identified and documented
☐ Staff performance in executing language access protocols reviewed
☐ Community feedback on language access during the event collected where feasible

Documentation

☐ Activation log updated with language access details
☐ Any gaps or failures documented and reported to OAO
☐ Corrective actions identified and assigned

Gap or Issue Identified	Corrective Action	Responsible Party	Timeline

OAO Notification
Was OAO notified of any language access gaps or failures during this activation?
☐ Yes ☐ No
If yes, date of notification and summary of what was reported:
_____
_____

Part 4: Annual Preparedness Review
Complete annually as part of the Department Language Access Plan review.

☐ All pre-translated emergency templates reviewed and updated
☐ After-hours vendor protocol reviewed and tested
☐ Emergency signage inventory reviewed and updated
☐ Emergency / PIO staff training completion confirmed
☐ Digital emergency alert templates reviewed and updated
☐ Backup process reviewed and confirmed to be current
☐ OAO notified of any changes to emergency language access procedures

Date of annual review:
_____
Reviewed by:
_____
Next scheduled review:
_____

Language Access Lead Certification
I certify that this Emergency Communication Checklist has been completed accurately and that any identified gaps have been or will be reported to OAO.

Language Access Lead Signature:

_____

Printed Name:

_____

Date:

_____

OAO Use Only

Received by:

_____

Date Received:

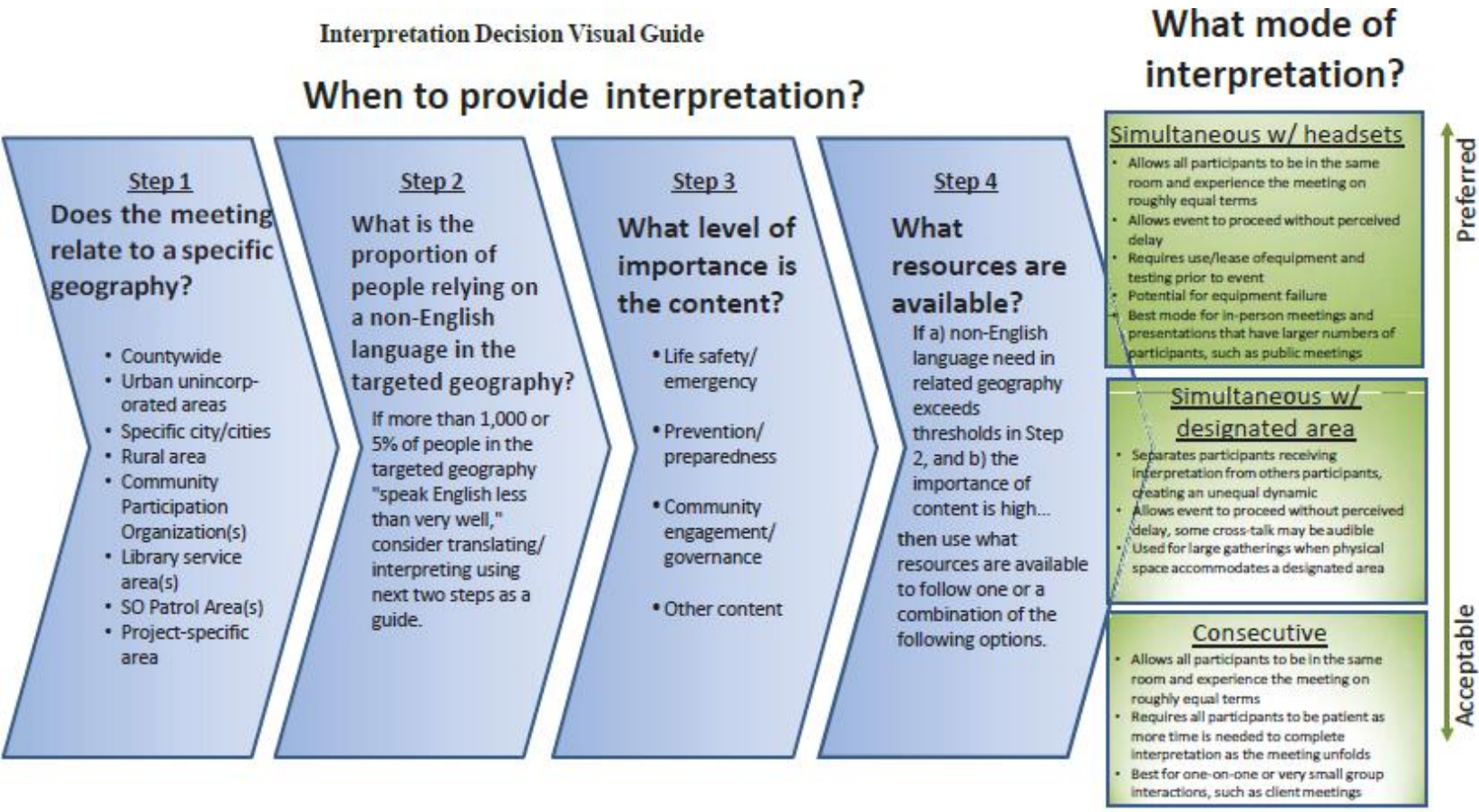
_____

Notes:

_____

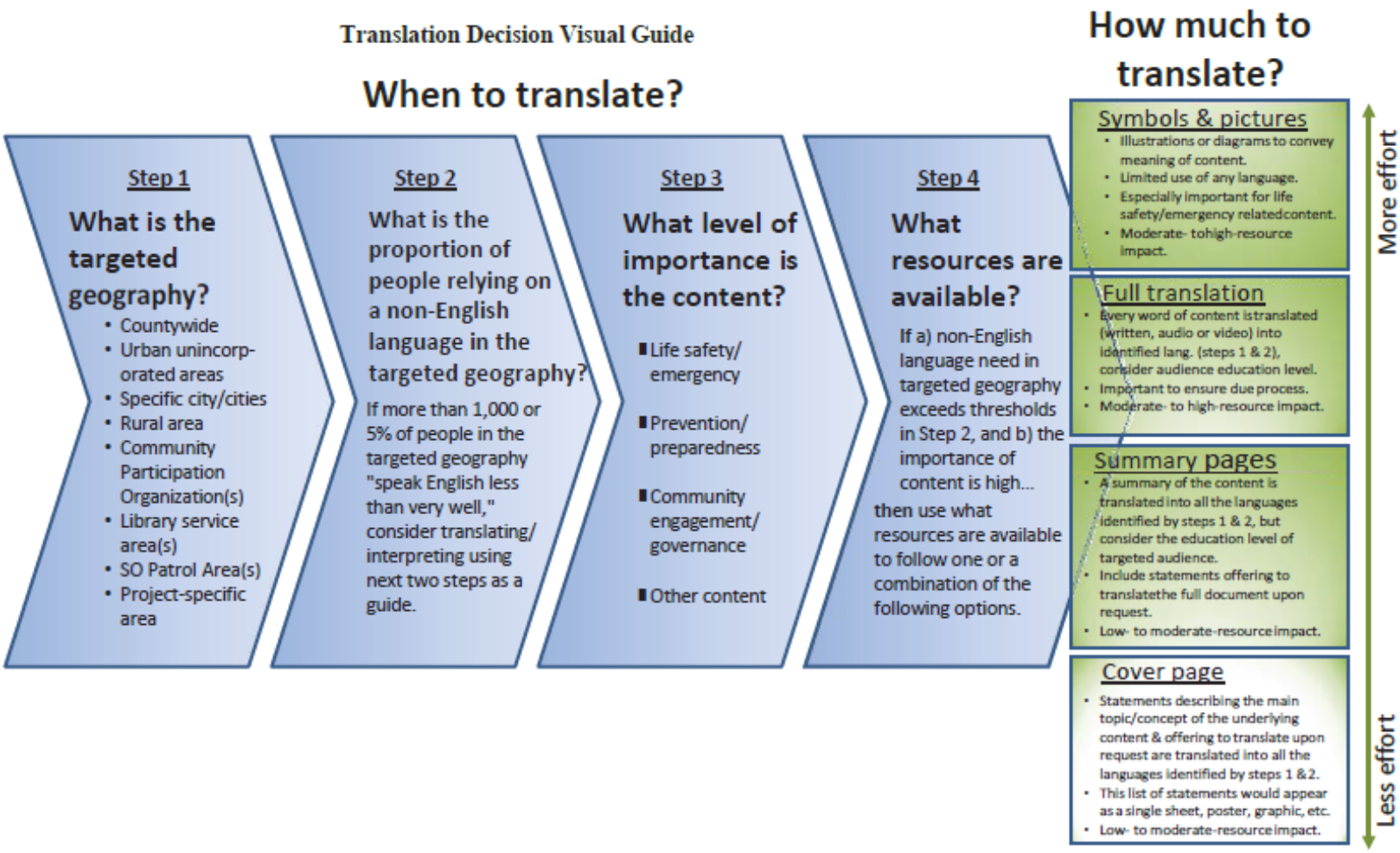
_____

Appendix H: Interpretation Decision Visual Guide



A four-step visual guide showing how to decide if interpretation is needed, based on geography, the number of non-English speakers, the importance of the content, and available resources. It also lists three interpretation options—consecutive, simultaneous in a designated area, and simultaneous with headsets—each with brief notes on when they are appropriate.

Appendix I: Translation Decision Visual Guide



A four-step visual guide showing how to decide when and how much to translate, based on the targeted geography, the proportion of non-English speakers, the importance of the content, and available resources. It also outlines translation options—cover page statements, summary pages, full translation, and symbols or pictures—arranged from lower to higher effort.

Appendix J: Vital Document Inventory

Purpose

This inventory is used by departments to identify, track, and manage the translation status of all documents designated as vital under the Washington County Language Access Framework and Administrative Policy #207. Each department is responsible for maintaining this inventory, submitting it to OAO upon completion, and updating it whenever a vital document is added, revised, or retired.

A vital document is one that is critical to ensuring meaningful access to major programs, activities, and services, particularly for individuals with Limited English Proficiency. Examples include notices of rights, application forms, benefit determination letters, complaint forms, public meeting notices, and enforcement-related communications.

Department Information

Department Name:

_____

Language Access Lead:

_____

Date of Inventory Completion:

_____

Date of Last Review:

_____

Next Scheduled Review Date:

_____

OAO Review and Approval Date:

_____

How to Complete This Inventory

For each document your department has identified as vital, complete one row in the inventory table. Use the following status codes:

- C — Complete: translated into all required Safe Harbor languages and current
- IP — In Progress: translation underway but not yet complete
- NR — Not Required: document does not require translation in this language based on four-factor analysis
- G — Gap: translation needed but not yet initiated

- R — Retired: document no longer in use

Safe Harbor Languages Reference

All vital documents must be translated into the following 11 Safe Harbor languages unless a documented exemption applies:

1. Spanish
2. Vietnamese
3. Chinese
4. Korean
5. Arabic
6. Russian
7. Japanese
8. Filipino/Tagalog
9. Khmer/Cambodian
10. Persian/Farsi
11. Somali

Vital Document Inventory Table

Status Codes: C = Complete | IP = In Progress | NR = Not Required | G = Gap | R = Retired

#	Document Name	Document Type	Program / Service	Document Owner	English Version Date	Spanish	Vietnamese	Chinese	Korean	Arabic	Russian	Japanese	Filipino/ Tagalog	Khmer/ Cambodian	Persian/ Farsi	Somali	Accessibility Reviewed?	Date of Last Translation Review	Notes
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			

Translation Gap Summary

After completing the inventory table, summarize your department's current translation gaps below.

Total number of vital documents identified:

_____

Total number fully translated into all required Safe Harbor languages:

_____

Total number with at least one translation gap:

_____

Total number with outstanding accessibility reviews:

_____

Languages with the most gaps across your vital documents:

_____

Planned timeline for closing all identified gaps:

_____

_____

Are there any vital documents where translation is not feasible due to budget constraints?

☐ Yes ☐ No

If yes, has OAO been notified?

☐ Yes ☐ No ☐ Not yet

New and Revised Documents

List any vital documents added or revised since the last inventory submission.

Document Name	Added or Revised?	Date of Change	Translation Status	Notes

Retired Documents

List any documents removed from the vital document inventory since the last submission.

Document Name	Date Retired	Reason	Notes

Department Director Certification

I certify that this Vital Document Inventory accurately reflects all documents this department has identified as vital under the Washington County Language Access Framework and that all translation gaps identified have been or will be reported to OAO.

Department Director Signature:

_____

Printed Name:

_____

Date:

_____

OAO Review

Received by:

_____

Date Received:

_____

Gaps Identified:

_____

Follow-up Required:

☐ Yes ☐ No

Notes:

_____

_____

Appendix K: Glossary of Key Terms

A

Accessible Format

An alternative way of presenting written information so that individuals with disabilities can access it. Examples include large print, audio recordings, braille, and screen-reader compatible digital documents.

Americans with Disabilities Act (ADA)

A federal civil rights law enacted in 1990 prohibits discrimination against individuals with disabilities in all areas of public life. Title II of the ADA applies to state and local governments and requires equal access to programs, services, and activities, including effective communication for individuals with disabilities.

Assistive Listening Device (ALD)

A device that amplifies sound for individuals who are hard of hearing. Assistive listening devices are commonly used in meeting rooms, service counters, and public facilities to support effective communication.

Auxiliary Aids and Services

A broad category of tools and services required under the ADA to ensure effective communication for individuals with disabilities. Examples include sign language interpreters, captioning, written notes, screen reader compatible documents, assistive listening devices, and video relay services.

B

Bilingual Staff

An employee in a bilingual-designated position who has passed County-required proficiency testing and regularly uses bilingual skills as an essential part of their job to meet community language access needs.

C

Certified Deaf Interpreter (CDI)

A professional interpreter who is themselves Deaf or hard of hearing and holds specialized certification to interpret for individuals who are Deaf and may not use standard American Sign Language — including those who use home signs, visual gestural communication, or who have limited formal language exposure. When a CDI is used, both a CDI and a hearing ASL interpreter must be present.

Civil Rights Officer (CRO)

The designated County official responsible for ensuring compliance with federal and state civil rights laws, including Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and related statutes. The Civil Rights Officer also serves as the County's ADA Coordinator, Language Access Coordinator, and Title VI Coordinator.

Consecutive Interpretation

A mode of interpretation in which the interpreter listens to a complete statement in the source language and then renders it in the target language after the speaker pauses. Recommended for one-on-one conversations and small group interactions.

D

Department Language Access Plan (LAP)

A department-specific document that describes how the countywide Language Access Framework standards will be implemented within that department's programs, services, facilities, communications, and community interactions. Each department must develop a LAP and submit it to OAO for review and approval.

Department Priority Language

A language that does not meet the countywide Safe Harbor threshold but is nonetheless important for program access, safety, or effective delivery within a specific department's service population. Departments identify Priority Languages through their Four-Factor Analysis and document them in their Language Access Plan.

Disparate Impact

A legal doctrine under civil rights law — including Title VI — that prohibits facially neutral policies or practices that have a disproportionate adverse effect on individuals based on race, color, national origin, or other protected characteristics, even if no discriminatory intent is present.

E

Effective Communication

The ADA Title II standard requires public entities to communicate with individuals with disabilities as effectively as they communicate with others. Achieving effective communication may require providing auxiliary aids and services such as sign language interpreters, captioning, or accessible formats.

Equal Employment Opportunity (EEO)

The principle that all employment decisions — including hiring, promotion, discipline, and termination — must be made without regard to race, color, religion, sex, national origin, age, disability, or other protected characteristics. Washington County's EEO obligations are documented in its Equal Employment Opportunity Plan.

Equal Employment Opportunity Plan (EEOP)

A formal document required by federal law for certain recipients of federal financial assistance that describes the County's workforce composition, identifies areas of underrepresentation, and outlines strategies to ensure equal employment opportunity.

F

Fair Housing Act

A federal civil rights law that prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The Fair Housing Act also requires reasonable accommodations for individuals with disabilities in housing-related programs and activities.

Four-Factor Analysis

A framework required under Title VI guidance for assessing the language access needs of a program or service. The four factors are: (1) the number or proportion of LEP individuals served or encountered; (2) the frequency of LEP encounters; (3) the nature and importance of the program to people's lives; and (4) the resources available and associated costs.

G

Grievance Procedure

A formal process for receiving, investigating, and resolving complaints alleging violations of civil rights obligations. Washington County's ADA and Title VI grievance procedures are administered by the Office of Access and Opportunity.

I

iSpeak Card

A language identification tool that allows individuals with Limited English Proficiency to point to their language, prompting staff to contact an interpretation vendor for assistance. iSpeak cards are one OAO-approved language identification tool reviewed annually for currency and accuracy.

Interactive Process

The required dialogue between a covered entity and an individual with a disability to determine what reasonable accommodation or modification is needed and how best to provide it. The interactive process is required under the ADA and Section 504 before denying an accommodation request.

Interpretation

The act of listening to spoken or signed communication in one language and rendering it orally or visually in another language in real time, while preserving meaning, tone, and intent. Interpretation is a distinct professional skill from translation.

L

Language Access

The obligation of government entities receiving federal financial assistance to ensure that individuals with Limited English Proficiency have meaningful access to programs, services, and activities. Language access obligations are grounded in Title VI of the Civil Rights Act of 1964 and related federal guidance.

Language Access Coordinator

The designated County official responsible for coordinating the development, implementation, and monitoring of the County's language access program, including maintaining vendor relationships, overseeing the Language Access Framework, and providing technical assistance to departments.

Language Access Lead

A staff member designated by each department director to serve as the primary point of contact between the department and OAO on all language access implementation, compliance, and reporting matters.

Language Block

A standardized, pre-approved piece of text used across County documents, forms, signage, and communications to inform community members of the availability of free language assistance services. Language blocks must be used consistently and may not be modified without OAO authorization.

Limited English Proficiency (LEP)

The condition of individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English at a level that permits them to interact effectively with County programs, services, and activities.

M

Meaningful Access

The standard under Title VI requiring that language assistance be accurate, timely, and effective — sufficient to allow an LEP individual to understand and participate in a program, service, or activity to the same degree as an English-speaking individual.

N

Nondiscrimination

The principle that no person shall be subjected to discrimination on the basis of race, color, national origin, sex, age, disability, or other protected characteristics in the receipt of benefits or services from programs receiving federal financial assistance.

O

Office of Access and Opportunity (OAO)

The Washington County office responsible for providing leadership and support to ensure equal access to County services, programs, and opportunities. OAO is the central authority for the County's civil rights compliance, language access program, ADA coordination, and Title VI obligations.

P

Plain Language

A communication standard requiring that documents and materials be written in clear, concise, and easily understood language — avoiding jargon, acronyms, and idiomatic expressions — so that all readers, including those with limited English proficiency or varying literacy levels, can understand the content.

Pre-Translation Checklist

A required quality control step that must be completed before any document is submitted for translation, confirming that the document is in its final English version, meets plain language standards, has defined acronyms, contains no idioms or slang, meets ADA accessibility standards, and has accurate deadlines and contact information.

Public Participation Plan (PPP)

A document describing how Washington County ensures that community members — including LEP individuals, individuals with disabilities, and historically underserved populations — have meaningful opportunities to participate in public decision-making processes.

Q

Qualified Interpreter

A professional interpreter who meets recognized standards of competency, accuracy, and ethical conduct appropriate to the language pair and service context. Qualified interpreters must be used for all high-stakes interactions involving rights, benefits, eligibility, enforcement, safety, health, or legal matters.

Qualified Translator

A professional translator who converts written materials from one language to another with accuracy, cultural competency, and subject matter knowledge appropriate to the document type. Translation is a distinct professional skill from interpretation.

R

Reasonable Accommodation

A modification or adjustment to a program, service, activity, or physical environment that enables an individual with a disability to participate equally. Under the ADA and Section 504, reasonable accommodations must be provided unless doing so would constitute an undue hardship.

S

Safe Harbor Language

A language spoken by a population that exceeds 5% of a geographic area's total population or more than 1,000 individuals, triggering a requirement to provide written translations of vital documents in that language. Washington County has identified 11 Safe Harbor languages based on current demographic data.

Section 504

Section 504 of the Rehabilitation Act of 1973, a federal civil rights law that prohibits discrimination against individuals with disabilities by programs and activities receiving federal financial assistance. Section 504 imposes obligations similar to the ADA on federally funded programs.

Simultaneous Interpretation

A mode of interpretation in which the interpreter renders the message in the target language at the same time the speaker is speaking in the source language. Recommended for larger group presentations and public meetings, particularly when simultaneous interpretation equipment is available.

T

Title VI of the Civil Rights Act of 1964

A federal civil rights law prohibiting discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Title VI is the primary legal basis for language access obligations for government entities, as interpreted through Department of Justice guidance establishing that discrimination on the basis of national origin includes discrimination against individuals with Limited English Proficiency.

Translation

The conversion of written text from one language into an equivalent written text in another language, preserving meaning, tone, and intent. Translation is a distinct professional skill from interpretation.

V

Video Relay Interpretation (VRI)

A technology-based interpretation service that provides real-time sign language interpretation through a video connection when an in-person interpreter is not available or feasible. VRI is a free service available to individuals who are Deaf, hard of hearing, DeafBlind, or speech-disabled.

Vital Document

A document that is critical to ensuring meaningful access to a County program, activity, or service — particularly for individuals with Limited English Proficiency. Vital documents must be translated into all Safe Harbor languages. Examples include notices of rights, application forms, benefit determination letters, complaint procedures, and public meeting notices.

W

WCAG 2.1 AA

Web Content Accessibility Guidelines version 2.1, Level AA — the federal standard required under ADA Title II for state and local government websites and digital applications. WCAG 2.1 AA establishes technical requirements for making web content accessible to individuals with disabilities.