

Language Access Tracking SOP

Purpose: Tracking is a measurable way the city can assess its efforts to provide language access to community members with limited English proficiency and use data to assess institutional barriers.

Collecting and tracking language access data demonstrates compliance with Title VI of the Civil Rights Act of 1964 & Executive Order 13166. It is also in accordance with [Resolution 37516](#). Providing meaningful access to government can result from fulfilling public initiated language access requests and from proactive measures taken by the city.

The following is designed to help you collect, document, and report on access compliance activity.

Tracking

1. City-initiated – proactive & planned
2. Public-initiated - responsive

Data collection points:

- Bureau/office/service area
- Program/Service/Activity
- Date
- Name of person placing request (use confidentiality measures)
- Type of contact:
 - phone
 - in-person
 - written
 - meeting/event
 - other (provide brief description)
- Language
- Type of request
 - Spoken – need interpreter or verbal assistance
 - Written – need translation of document / information
- Provide details in narrative format to document the request details and desired outcomes, rationale for providing an alternative, reasons for denying a request, and any other details acquired during intake process with the multilingual community member.

Please note that city bureau/program/council office/service area data collection may vary and information beyond the minimum categories should be based on the unique services provided and operations. Bureaus should assess, process, and consider incorporating additional data points into their own tracking efforts.

Usage: Gather and track data on city-initiated activities proactively providing access related to language access and public-initiated requests for access.

The following is a list of descriptions of data points to collect, description of their usage, and a detailed description of the content that should be included or recorded.

Note: Leadership can decide to add data points deemed necessary or useful to capture access related efforts conducted by the bureau/office/program/service area based on services and operations.

Data Point	Description	Answer Field:
Section / Division	Name of Section / Division	Use complete name
Project name & purpose (brief description)	For example: Community information flyer or Press Release	Content/Write-in
DATE	Date the project was initiated. month/date/year format	XX/XX/XXXX
Staff responsible	Names of person(s) responsible for the process	Content/Write in
Type of service: telephone interpreter/document translation/on-site or remote interpreter	Document type of language service utilized	Content/Write in: telephone interpreter document translation on-site or remote interpreter
Language(s)	Languages proactively used for project/ public requested language	Content/Write in: list all including ASL
Language Service Provider (vendor)	List agency name of language service provider	Content / Write in
Cost	Final cost of provided language service	Total dollar amount: \$0.00
Intake & Progress Notes	What is the scope of the request being placed? What is the progress of the proactive language access effort?	Ex.) Complete or in progress: use this field as needed for narrative format notes/documentation of progress on fulfilling request. Also document any operational quality improvement changes as a result of request.

Guidance

Responding to language access requests and responsibility to provide reasonable, meaningful access:

This tracking tool includes tracking for public-initiated requests for access and city-initiated proactive efforts. Tracking will provide data that will be used to show compliance activities and compliance with Title VI of the Civil Rights Act of 1964 and E.O. 13166. The data will be used for civil rights reporting and for the assessments required in language access planning as outlined by the Department of Justice.

Data should be collected for every public-initiated request for access. It is recommended to document in real time and update as necessary.

The person taking the request can fill out, in narrative form, the conversation they had with the community member who identifies as Limited English Proficient (LEP) to deduce request details and desired outcomes, rationale for providing an alternative, reasons for denying a request, and any other details necessary. Additional details should be documented in the notes section should an alternative to the person's request be provided (include process) and/or if the request was denied (provide rationale and outcome).

When a request comes into the city, the city staff should use a language service provider (interpreter) or staff receiving the language pay differential*, to conduct an intake where the staff and the individual placing the request can have a detailed conversation about the individual's needs. Engaging in the intake process allows the city staff to listen to the needs of the individual who has limited English proficiency (LEP) and ask detailed questions to best determine the scope of the request. Engaging with the community member to assess their language access needs should mitigate and deter city staff (or city service volunteer) from denying the initial request.

Tracking language access requests from the public

Language access requests need to be tracked in order to demonstrate compliance with civil rights laws and because the city of Portland is committed to providing equitable access to community members who identify as having limited English proficiency, in accordance with the city's language access policy.

Tracking language access request information will:

- Provide an assessment of budgetary spending and ability to project future costs and need for allotment of funds for meaningful and equitable access to community members with limited English proficiency.
- Provide information regarding languages commonly used in requests and help determine gaps in serving the public who need language access
- Assess the of the types of contact with multilingual community members. Ex. In-person, phone, written request, event participation, etc.
- Demonstrate the steps taken to fulfill a language access request and its outcomes

*Note regarding the use of staff who receive the language pay differential:

Instances where these staff provide assistance should also be included in language access data tracked. Same as above, the provision of language assistance falls into the two categories: responding to public-initiated requests or city-initiated efforts to provide access.

Language Pay Differential staff can serve as a language link:

Bilingual/multilingual city employees who receive the language pay differential can serve as a language link or city system navigator while they assist the community member experiencing institutional language barriers. The staff member is not trained as a professional interpreter or translator. The employee can provide spoken assistance because the eligibility test is for verbal proficiency.

City of Portland Language Access Policy

It is the policy of the City of Portland to ensure meaningful access to the City's programs, services, activities, information, and communications to all community members including individuals who are limited English proficient (LEP). The City of Portland is responsible for taking reasonable steps to provide equitable and meaningful access to its programs, services, activities, and communications. The city has an institutional responsibility under Title VI of the Civil Rights Act of 1964 and Executive Order 13166, to ensure limited English proficiency (LEP) community members are protected from national origin discrimination. Furthermore, it is the City's institutional responsibility to provide language access services, free of charge, to LEP community members, thus creating equitable access to city government.

[Resolution 37516](#) Establish and implement the City's Language Access policy and program resolution
[Citywide Language Access Program](#)