Language Access Plan

Prepared by
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[Insert WSDOT Office of Equity and Civil Rights Approval Letter]

Cowlitz-Wahkiakum Council of Governments

A Resolution to Adopt the Cowlitz-Wahkiakum Council of Governments Language Access Plan

RESOLUTION NO. 26-33

WHEREAS, the Cowlitz-Wahkiakum Council of Governments (CWCOG) as a bi-state Metropolitan Planning Organization (MPO), an Economic Development District (EDD), and the lead agency for the Southwest Washington Regional Transportation Planning Organization (SWRTPO) does receive federal funding through the Washington State Department of Transportation (WSDOT) for both the MPO and the RTPO and the Economic Development Administration for the EDD; and

WHEREAS, the receipt of said federal funds requires the CWCOG to implement policy that ensures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity; and

WHEREAS, the CWCOG is committed as an agency to ensure that access to its programs is not limited based on limited English proficiency and language access issues, and

WHEREAS, the CWCOG is committed as an agency to ensure that every effort is made to ensure nondiscrimination across all its programs and activities, whether or not those programs or activities are federally funded, and

NOW, THEREFORE, BE IT RESOLVED that by affirmative action on this resolution, the CWCOG Board of Directors does hereby adopt the CWCOG Language Access Plan as presented.

PASSED AND APPROVED on this 22nd day of October 2026.

William A. Fashing, Executive Director

Mike Karnofski, Chair

Title VI Statement:
The CWCOG operates in accordance with all applicable federal and state laws, including Title VI of the Civil Rights Act of 1964, without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age, or disability.

Those persons with limited English Proficiency may request language assistance through oral, visual, and/or written translation at no cost to the individual.

For assistance or questions regarding the CWCOG's Title VI or Limited English Proficiency Policies or to file a complaint, please contact the Agency's Title VI Coordinator at (360)577-3041.

ADA Statement:
The CWCOG is committed to providing equal access to its facilities, programs, and services for persons with disabilities. This material can be made available in an alternate format by contacting the ADA Coordinator by calling 360-577-3041. People who are deaf or hard of hearing may make a request by calling the Washington State Relay at 7-1-1. All Services are free of charge to individuals in need of assistance.

PURPOSE

The purpose of this Language Access Plan (LAP) is to establish policy and provide guidance in developing and implementing reasonable efforts to eliminate or reduce "Limited English Proficiency" (LEP) as a barrier to accessing Cowlitz-Wahkiakum Council of Governments programs, activities, and communications.

The CWCOG receive federal financial assistance for its programs and is required under Title VI of the Civil Rights Act of 1964 (42 U.S.C § 2000d) to take reasonable steps to provide meaningful access to its programs and activities regardless of race, color, or national origin. Discrimination based on national origin can include the failure to provide appropriate language access. The CWCOG will translate materials used in its planning and programs to Spanish and other languages as required. The translated materials and resources are intended to provide meaningful access to the agency's programs and services.

Limited English Proficiency (LEP) is a term used to describe individuals who are not proficient in the English language. Southwest Washington is home to individuals from different cultures and backgrounds, of which a number are limited English proficient.

If at any time, the LAP is found to contradict or be out of compliance with current federal or state guidelines, the federal and/or state guidelines shall take precedence until such a time that a revision to this policy can be implemented.

GOALS AND OBJECTIVES

The CWCOG Language Access Plan (LAP) is built in tandem with the CWCOG's Title VI Plan. As such, its purpose is to support the Title VI efforts of the CWCOG and maintain consistent and effective guidelines leading to meaningful and timely access to agency programs and/or activities by persons with Limited English Proficiency (LEP).

LAP Objectives

- To establish guidelines that allow the CWCOG to successfully comply with the Civil Rights Act of 1964.
- To address LEP barriers that may limit access to important benefits or services, ability to exercise certain rights or comply with applicable responsibilities,

and/or the understanding of information provided by federally funded programs and activities administered by the CWCOG.

- To ensure that all people have meaningful access to CWCOG programs, services, and information at no cost to them.
- To create consistent agency guidelines that will provide equal access to all CWCOG programs and activities by all citizens.
- To provide CWCOG staff, consultants, sub-recipients, and clients with the knowledge and tools to fully abide by and enact the Language Access Policy.

TRAINING

All CWCOG personnel shall be responsible for connecting LEP individuals they may encounter with free language assistance services.

To ensure meaningful access to LEP individuals across the agency's programs and activities employees will be trained and prepared to inform members of the public that language assistance services are available, and how the agency can provide those services to them. These services are provided free of charge. As part of the onboarding process, new employees will be required to read the Language Access Plan.

Additional training topics may include but are not limited to:

- The importance of providing language assistance services
- Tools for effectively and respectfully communicating and interacting with LEP individuals
- Standard Operating Procedures for providing language access services
- How to document data for LEP Individuals including preferred language and type of need (Translation, Subtitles, etc.)
- How to request and use an interpreter

- What type of translated information is available for LEP individuals and where it can be located
- CWCOG's Vital documents that must be translated

FOUR FACTOR ANALYSIS

The Four Factor Analysis is a tool for providing "meaningful access" to include services for oral interpretation and written translation of vital documents.

Factor 1: Demographics – Number and proportion of LEP persons and languages spoken in the service area

The CWCOG does not currently collect usage statistics that would quantify the frequency of contact with members of the LEP population.

According to the Safe Harbor Threshold, LEP language groups that constitute 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. The CWCOG operates as the lead organization for the Southwest Washington Regional Transportation Planning Organization (SWRTPO) that covers five counties: Cowlitz, Grays Harbor, Lewis, Pacific, and Wahkiakum. For the purposes of this effort, the collective data of the five-county boundary of the SWRTPO is used for the determination. For programs, plans, and activities that do not apply region wide, applicable county data or appropriate small area data will be referenced for project purposes and determination of need. Data derived from the American Community Survey 2024 (2024: ACS 5-Year Estimate, Table C16001) identified the Spanish speaking language group as meeting the 1,000 or more-population threshold. Data will periodically be assessed for additional language groups that may meet the criteria.

Language	**Total Number**	**Percentage (Rounded to nearest hundredth)**
Spanish	7,597	2.60%
French, Haitian, or Cajun	65	0.02%
German/Germanic Languages	286	0.01%
Russian, Polish, Slavic Language	164	0.06%

Language	Total Number	Percentage (Rounded to nearest hundredth)
Other Indo-European	220	0.08%
Korean	163	0.06%
Chinese, Mandarin, Cantonese	247	0.09%
Vietnamese	207	0.07%
Tagalog, Filipino	341	0.12%
Other Asian and Pacific Island Language	539	0.19%
Arabic	62	0.02%
Other and Unspecified	116	0.04%

Source: American Community Survey 2024 5-Year Estimate

Factor 2: The frequency with which people with LEP come in contact with CWCOG programs, activities, or services.

The CWCOG does not track its interactions with LEP individuals, but takes measures to ensure that the CWCOG programs, activities, and communications are accessible as appropriate.

The CWCOG fully complies with all applicable federal and state public notice requirements of all their programs and applies the adopted *Public Participation Plan* when appropriate.

Factor 3: The importance to people with LEP regarding CWCOG's programs, activities, and services.

The nature of the CWCOG's planning programs and activities can have a wide range of impacts on the communities of the region. At any given time, the policies and plans developed through these programs can affect the region and attract varying degrees of interest from the population. Each project and/or program is assessed as to the importance or impact to both the population at large and LEP persons.

Factor 4: The resources available to CWCOG and the overall cost to help people with LEP.

CWCOG is committed to providing meaningful language access services to the region's Spanish speaking population and, when practical, in assisting speakers of other languages with limited English proficiency, though interpretive services within the region are limited. CWCOG continually seeks creative, low-cost measures to assist LEP individuals.

The CWCOG will utilize several tools for notifying identified LEP populations when appropriate and applicable to the CWCOG's programs and activities. The Agency will work with community-based organizations to inform LEP persons of upcoming meetings and that language assistance is available particularly if a program or activity affects an identified LEP neighborhood within the project's scope.

LANGUAGE ASSISTANCE SERVICES

CWCOG staff will inform the public that these language assistance services if provided will be free of charge to the individual.

Accessibility for Sight and Hearing-Impaired Persons

CWCOG will maintain an accessible website and encourage use of 711 for a TDD/TYY line (Telecommunications Device for the Deaf/Teletypewriter). All CWCOG public meetings shall be conducted in facilities that are accessible to people with sight, hearing, or mobility disabilities. The CWCOG will also hold public meetings in facilities served by public transportation during hours of operation when possible.

Bilingual Staff

If there are qualified bilingual staff employed by the CWCOG their role in translation services would be limited. Staff would be utilized as an interim measure while certified translation/interpretation services are being secured unless such staff is fully certified.

CWCOG Website

At a minimum, the CWCOG shall post Title VI compliance statements and language access directions in both English and Spanish on the agency's website located at

www.cwcog.org.

Community-Based Organizations

Identified not-for-profit organizations and community groups that are likely to involve or interact with the Spanish-speaking community will be informed of opportunities for public comment when applicable and asked to assist with making LEP groups aware of available services. These groups and agencies could include Community Action Programs, housing authorities, community colleges, health care facilities, libraries, senior centers, houses of worship, minority business organizations, agencies specifically focused on the Spanish-speaking community among others. Distributing translated resources from CWCOG's work in its five-county region will be utilized as they are identified.

Focus Groups, Small Groups and Public Meetings

On occasion, CWCOG convenes targeted outreach meetings and focus groups with community leaders representing Title VI, Environmental Justice, and/or LEP populations. Where CWCOG is either informed or reasonably anticipates that members of the Spanish speaking LEP group will be in attendance, a Spanish-speaking translator will be provided when possible. The CWCOG will take appropriate steps to address translator needs for other LEP individuals as requested.

Mailing List Improvements

CWCOG will monitor and update mailing lists and databases to initiate and maintain contact with interested parties, including those identified as LEP, other underserved groups, community groups, Title VI relevant populations, businesses, membership groups, and local governments.

Translation/ Interpretive Services

Appropriate interpretive and/or translation services shall be identified within the region and used to translate outreach materials and instructions on how to access available language assistance services. When required, when timing allows and when financially feasible, materials and notices shall be provided in Spanish. When required and not financially feasible, materials and notifications shall bare a statement both in English and

Spanish directing LEP persons to language access services provided by the CWCOG.

A list of translation service providers the CWCOG uses/may use will be maintained in the CWCOG files. When using translation/interpretive services the CWCOG will strive to work with experienced providers that have a track record for quality and accurate services. Documents and work will be checked periodically using AI translation or other means to ensure quality and accurate translations.

Visualization Tools

When applicable, the CWCOG will use standardized visualization tools such as 'I Speak" language identification cards that can facilitate communication with people having limited English proficiency or a low degree of literacy. Other visual tools may include maps, charts, graphs, illustrations, visual presentations, models, and videos that are predominantly graphic to explain concepts.

NOTICE TO LEP PERSONS

The CWCOG will make reasonable efforts to ensure the public is aware of the language services available. For projects and meetings that include public participation opportunities, a statement providing information on how to obtain language alternate versions or translation services will be available as possible in Spanish. "I Speak" cards are utilized in meeting boxes used by staff for meetings and the reception desk to locate the correct translation services needed for individuals with limited English proficiency.

MONITORING AND UPDATING OF THE LAP PLAN

CWCOG will monitor community demographics and track requests for translation services. Data will be gathered and assessed in the same manner outlined in CWCOG Title VI Policy. Periodic updates to this plan shall be made to address changes in federal or state requirements, changes in data and demographics as well as reflect changes in practice to improve services for all residents.