

Limited English Proficiency Plan

NDOL Office of Employment and Training

April 2018

NEBRASKA

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DEPARTMENT OF LABOR

Office of Employment and Training Limited English Proficiency Plan

April 2018

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I. Executive Summary:

Individuals who do not speak English as their primary language and those who have limited ability to read, write, speak, or understand English may incur a barrier to employment and are entitled to language assistance in their effort to enter the workforce. The quality and accuracy of the language is critical to these efforts and shall be provided in a timely manner to ensure maximum access to services. This plan provides individuals with language access barriers, also referred to as Limited English Proficiency (LEP), access to programs and services provided by the American Job Centers and Nebraska Department of Labor (NDOL) offices on an equitable basis. This plan is applicable to all NDOL Office of Employment and Training (OET) entities that receive federal financial assistance.

II. Introduction/Background

a. Planning Committee

In an effort to provide equitable services to individuals with language access barriers the OET has established a planning committee consisting of the following team members:

2018 LEP Planning Committee

Lori Marquez, Scottsbluff (bilingual)	Diana Martinez, Norfolk (bilingual)
Tom Prescott, Omaha (bilingual)	Dawn Carrillo, LMI
Kari Buehler, North Platte	Kari Janssen, Beatrice
Maria Rowan, Virtual Services Unit (bilingual)	Naomi Rolofson, Lincoln
Vicki Pflasterer, Grand Island	Andrea Curtis, OET

b. Purpose

The planning committee is responsible for: identifying major concentrations of ethnic groups with language access barriers in each region; staff training needs; inventorying and identifying language assistance aids such as posters, handbooks, forms, handouts, etc.; and making recommendations to OET for development of other language assistance aids to assist with service delivery.

The OET LEP Plan is reviewed and updated on an annual basis with the exception of any major changes in demographics, types of services, program changes, or other factors affecting a specific geographic location. Should any of these changes occur, an immediate review of the situation, and plan update will be completed. The annual review, as well as any necessary modifications, will be conducted by the LEP committee members. The LEP committee schedules meetings on a quarterly basis to review any issues or concerns potentially affecting the LEP plan or populations with language access barriers.

The Wagner-Peyser Governor's Reserve funds (10% set aside) may be used to support procurement of language assistance materials and to support costs associated with group language assistance training. Individual clients who require language assistance training and are eligible for Workforce Innovation and Opportunities Act (WIOA) programs and services may be funded from the specific program area funds (Adult, Dislocated Worker, and Youth). These determinations will be left to the Workforce Development Areas. Language assistance tools will also be utilized on an as needed basis for the State Rapid Response Activities and the Trade Adjustment Assistant Assistance (TAA) Program.

The goal of this plan is to function as a tool used to assess the effectiveness of OET's service delivery to individuals with language access barriers.

c. Title VI of Civil Rights Act of 1964

Section 601 of Title VI of the Civil Rights Act of 1964 provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The requirement to provide meaningful access under Title VI applies beyond the education context to include all of the programs and activities of all recipients of Federal financial assistance.

d. Executive Order No. 13166

On Aug. 11, 2000, President Clinton issued Executive Order No. 13166, entitled “Improving Access to Service for Persons with Limited English Proficiency” (available electronically at dol.gov/oasam/regs/statutes/Eo13166.pdf). This executive order was meant to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure equal accessibility to federally funded programs and services to otherwise eligible individuals not proficient in the English language. The executive order states that:

Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.

Executive Order No. 13166 ensures that in addition to federal agencies, recipients of federal financial assistance funds must also comply with Title VI and the LEP guidelines of the agency from which the funds are received. In addition, each agency subject to the requirements of Title VI must publish guidance to its respective recipients clarifying its obligation. As a recipient of federal funding, this requirement applies to all programs and services offered by OET.

e. United States Department of Labor Guidance

The United States Department of Labor (DOL) has provided policy guidance to federal financial assistance recipients regarding the Title VI prohibition against national origin discrimination affecting LEP persons. The DOL has created a webpage entitled “LEP Toolkit” which provides numerous resources for recipient agencies to utilize as they create LEP Plans. This webpage is accessible at dol.gov/oasam/programs/crc/lepcnt.htm.

Among the available LEP planning resources provided by DOL, is the “Policy Guidance on the Prohibition of National Origin Discrimination as it Affect Person with Limited English.” This guidance policy was published in the Federal Register on May 29, 2003. The DOL policy guidance states:

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally assisted programs and activities.

The DOL policy guidance helps to ensure “that federally assisted programs aimed at the American public do not leave some behind simply because they face challenges communicating in English.” Sub-recipients likewise are held to the same standards when federal funds are passed through from one recipient to a sub-recipient.

29 CFR part 37 provides regulations for the implementation of policies and procedures that provide equal opportunity and equal access in a nondiscriminatory manner. 29 CFR § 37.35(a) states that where “a significant number or proportion of the population eligible to be served, or likely to be directly affected, by a [WIOA] Title I – [financially] assisted program or activity may need services or information in a language other than English in order to be effectively informed about, or able to participate in, the program or activity”.

The Section 188 regulations require recipients “to take reasonable steps to provide services and information in appropriate languages” [29 CFR 37.35(a)(2)]. Even where there is not a significant number or proportion of LEP persons in the community serviced by the recipient, recipients nonetheless are required to “make reasonable efforts to meet the particularized language needs of limited-English speaking individuals who seek services or information from the recipient” [29 CFR 37.35(b)].

III. Analysis

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the U.S. DOL has stated that the starting point is an individualized assessment that balances the following four factors:

Factor 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population

The U.S. Census Bureau has a range of four classifications of how well people speak English. The classifications are (1) ‘Very Well,’ (2) ‘Well,’ (3) ‘Not Well,’ and (4) ‘Not At All.’ For planning and statistical purposes, we are considering individuals who speak English at any level below “Very Well” as Limited English Proficient (LEP).

As part of this planning process, we have included statistics from the 2016 U.S. Census Bureau American Community Survey 5-Year Estimates Table to illustrate the number of individuals living in the state of Nebraska who speak English less than “Very Well.” In addition, this U.S. Census survey indicates the number of individuals in each language group among the total population of individuals who

speak English less than “Very Well.” These statistics help to identify prominent and/or growing language groups for planning purposes at a state level, region level, and by Workforce Development Area.

Factor 2: The Frequency with Which LEP Individuals Come in Contact with the Program

The program must be evaluated in relationship to the number of LEP persons who are within the program area and the number of times those persons have frequented the program or activity. NDOL utilizes the NEworks system, the state’s public labor exchange system, to provide information to job seekers, to register program applicants and participants, and to list available jobs throughout Nebraska. User statistics have been pulled from NEworks Registered Individuals, which indicate voluntary self-identification information which may help to indicate a potential need for language assistance among individuals.

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

The OET provides a wide range of programs, activities and services. The OET provides Veterans Services, Job Seeker Services, Business Services, Labor Market Information, and a multitude of other services. The OET is responsible for administering numerous programs that receive federal funding, including: Workforce Innovation and Opportunities Act, Wagner-Peyser, Veterans, Trade Adjustment Assistance, Rapid Response, Work Opportunity Tax Credit (WOTC), and many other programs receiving federal funding or grants.

Factor 4: The Resources Available to the Recipient and Costs

OET serves the entire state of Nebraska and is required by federal law to provide access to LEP persons, and to ensure that its sub-recipients also provide such access. The Wagner-Peyser Governor’s Reserve funds (10% set aside) may be used to support procurement of language assistance materials and to support costs associated with group language assistance training.

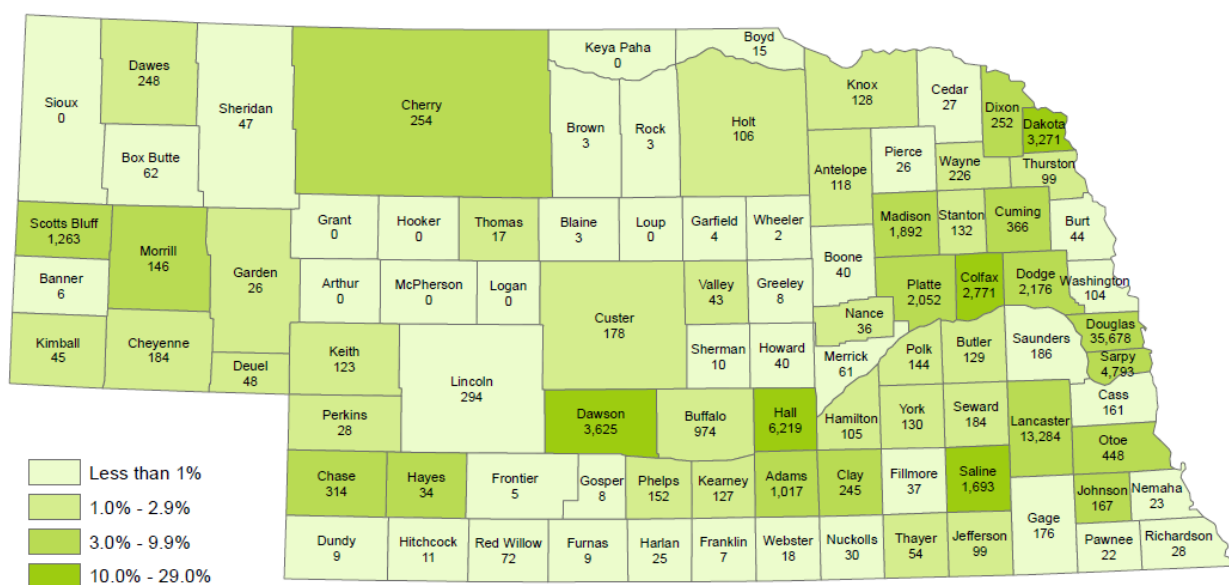
IV. Identifying Individuals with Language Barriers:

In Nebraska, there are an estimated 87,469 individuals or 5.0 percent of the population age 5 years and older who speak a language other than English and speak English less than very well according to the 2012-2016 American Community Survey estimates in Table B16004. The highest numbers of people with limited English proficiency generally

reside in the most populous counties in the state with Douglas (35,678), Lancaster (13,284), Hall (6,219) and Sarpy (4,793) counties topping the list.

Individuals with language access barriers account for a significant proportion of the population in several counties when the percent of the total county population age five and older is considered. In Colfax County, more than a quarter (29.0 percent) of the population speak limited English. Other counties with high concentrations of individuals with language access barriers include Dakota with 17.2 percent, Dawson with 16.4 percent, Saline with 12.6 percent and Hall with 11.0 percent. A second group including Douglas, Platte, Chase, Madison and Dodge counties range from 5.8 percent to 8.2 percent, all above the statewide average of 5.0 percent. This group of 10 counties accounted for more than two-thirds (68.2 percent) of all the limited English speakers in the state.

Number and Percent of Individuals Age 5 and Older Who Speak English Less Than Very Well by County



In the map above, shading displays the percentage of each county's population age 5 and older who speak English less than very well.

The table below displays the percentage of each county's population age 5 and older who speak English less than very well.

Rank	County	Total Number of Individuals who Speak English Less than Very Well	Percentage of Population Who Speak English Less than Very Well
1	Colfax	2771	29.0%

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2	Dakota	3271	17.2%
3	Dawson	3625	16.4%
4	Saline	1693	12.6%
5	Hall	6219	11.0%
6	Chase	314	8.2%
7	Douglas	35678	7.1%
8	Platte	2052	6.8%
9	Dodge	2176	6.3%
10	Madison	1892	5.8%
11	Lancaster	13284	4.7%
12	Cherry	254	4.7%
13	Dixon	252	4.6%
14	Cuming	366	4.3%
15	Clay	245	4.1%
16	Scotts Bluff	1263	3.7%
17	Hayes	34	3.5%
18	Adams	1017	3.4%
19	Johnson	167	3.4%
20	Morrill	146	3.2%
21	Sarpy	4793	3.0%
22	Otoe	448	3.0%
23	Dawes	248	2.9%
24	Polk	144	2.9%
25	Thomas	17	2.6%
26	Deuel	48	2.6%
27	Wayne	226	2.5%
28	Stanton	132	2.3%
29	Buffalo	974	2.2%
30	Kearney	127	2.1%
31	Antelope	118	2.0%
32	Cheyenne	184	2.0%
33	Phelps	152	1.8%
34	Custer	178	1.8%
35	Butler	129	1.7%
36	Knox	128	1.6%
37	Keith	123	1.6%
38	Thurston	99	1.6%
39	Jefferson	99	1.4%
40	Garden	26	1.4%
41	Kimball	45	1.3%
42	Hamilton	105	1.2%
43	Seward	184	1.1%
44	Thayer	54	1.1%
45	Holt	106	1.1%
46	Valley	43	1.1%
47	Nance	36	1.1%
48	Perkins	28	1.0%

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49	York	130	1.0%
50	Saunders	186	1.0%
51	Sheridan	47	0.9%
52	Lincoln	294	0.9%
53	Pawnee	22	0.9%
54	Gage	176	0.9%
55	Merrick	61	0.8%
56	Banner	6	0.8%
57	Boyd	15	0.8%
58	Boone	40	0.8%
59	Harlan	25	0.8%
60	Nuckolls	30	0.7%
61	Burt	44	0.7%
62	Red Willow	72	0.7%
63	Fillmore	37	0.7%
64	Cass	161	0.7%
65	Howard	40	0.7%
66	Box Butte	62	0.6%
67	Blaine	3	0.6%
68	Washington	104	0.5%
69	Dundy	9	0.5%
70	Webster	18	0.5%
71	Gosper	8	0.4%
72	Hitchcock	11	0.4%
73	Pierce	26	0.4%
74	Richardson	28	0.4%
75	Greeley	8	0.3%
76	Nemaha	23	0.3%
77	Sherman	10	0.3%
78	Cedar	27	0.3%
79	Wheeler	2	0.3%
80	Franklin	7	0.2%
81	Rock	3	0.2%
82	Garfield	4	0.2%
83	Frontier	5	0.2%
84	Furnas	9	0.2%
85	Brown	3	0.1%
86	Arthur	0	0.0%
87	Grant	0	0.0%
88	Hooker	0	0.0%
89	Keya Paha	0	0.0%
90	Logan	0	0.0%
91	Loup	0	0.0%
92	McPherson	0	0.0%
93	Sioux	0	0.0%

The highest number and percent of Limited English speakers in the state, and all regions within the state, speak Spanish. The 59,485 people who spoke Spanish comprised 68.0 percent of all limited English speakers in the state. Vietnamese with 5.7 percent was second in the ranking. The top eight categories below account for 89.7 percent of all individuals with language access barriers in Nebraska.

Table 1: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Nebraska

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	59,485	68.0%
Vietnamese	4,993	5.7%
Other languages of Asia	3,966	4.5%
Chinese (incl. Mandarin and Cantonese)	2,994	3.4%
Arabic	2,372	2.7%
Amharic, Somali, or other Afro-Asiatic languages	1,939	2.2%
Nepali	1,587	1.8%
French (incl. Cajun)	1,111	1.3%
All Other Languages	9,022	10.3%

Examples of **Other languages of Asia** include Burmese, Karen, Turkish, and Uzbek. Examples of **other Afro-Asiatic languages** include Amharic, Chaldean Neo-Aramaic, Somali, and Tigrinya. According to the US Census Bureau, the coding of specific languages was updated in 2016 to reflect languages in accordance with the International Organization for Standardization's IOS-639-3 standard; no comparison was made to previous years due to changes. **Language categories 2012-2016 American Community Survey estimates in Table B16001**

The number of languages or language groups with limited English speakers varies considerably by Workforce Areas within the state. Greater Nebraska has five language or language groups with one percent or more of limited English speakers with Spanish topping the list at 84.7 percent. Within Greater Nebraska, there are marked differences between regions in the linguistically isolated populations. Greater Omaha has seven language or language groups with one percent or more limited English speakers with Spanish at 66.8 percent. The Greater Lincoln area has the highest number (9) of language or language groups with one percent or more limited English speakers. Spanish with 31.6 percent followed closely by Vietnamese with 25.0 percent.

The American Community Survey 2012-2016 estimates Table B16004 has detailed information on Spanish language speakers between the ages of 18 and 64. It has the

categories: "Speak Spanish," "Speak Spanish - Speak English Very Well," "Speak Spanish - Speak English Well," "Speak Spanish – Speak English Not Well," and "Speak Spanish – Speak English Not At All." In Nebraska, an estimated 92,621 people speak Spanish and of those, 24.4 percent speak English "Not Well" and 8.8 percent do not speak English at all. Unfortunately, Spanish is the only language with these detailed categories by the working age population available.

a. Greater Nebraska Workforce Development Area:

The American Community Survey 2012-2016 estimates, the most recent data available for county level data, show that there were 24,375 individuals in Greater Nebraska age five years and older who speak a language other than English at home and speak English less than "Very Well." Spanish is the language most frequently spoken by individuals with language access barriers with 84.7 percent for the Greater Nebraska region. This percentage varies across regions within Greater Nebraska from 84.7 percent in Region 5 to 74.8 percent in Region 1. The number of languages spoken by at least one percent of linguistically isolated populations also varies among the regions of Greater Nebraska from two languages/language groups in Region 2 to seven in Region 1.

Table 2: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region Greater Nebraska

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	20,644	84.7%
Other Asian and Pacific Island languages	796	3.3%
Vietnamese	510	2.1%
Chinese (incl. Mandarin and Cantonese)	359	1.5%
German or other West Germanic languages	286	1.2%
Other Indo-European languages	192	0.8%
All Other Languages	1,588	6.5%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **other West Germanic Languages** are Dutch and Yiddish. Examples of **Other Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. **2012-2016 American Community Survey estimates in Table C16001.**

i. Greater Nebraska Region 1

a. Region 1 is in the western part of the state and includes the following Nebraska Counties: Banner, Box Butte, Cheyenne, Dawes, Deuel, Garden, Kimball, Morrill, Scotts Bluff, Sheridan, Sioux. NDOL Career Centers located in Region 1 include:

- Alliance Job Center, 302 Box Butte Ave, Alliance, NE 69301
Phone: (308) 763-2935
- Scottsbluff Job Center, 505A Broadway, Ste 300, Scottsbluff, NE 69361 Phone: (308) 632-1420
- Sidney Job Center, 2264 Jackson St, Sidney, NE 69162, Phone: 308-254-4429

Table 3: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region 1

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	1,553	74.8%
Other Asian and Pacific Island languages	213	10.3%
Chinese (incl. Mandarin, Cantonese)	84	4.4%
Other Indo-European languages	69	3.3%
German or other West Germanic languages	47	2.3%
Russian, Polish, or other Slavic languages	22	1.1%
Tagalog (incl. Filipino)	22	1.1%
Korean	19	0.9%
Arabic	13	0.6%
All other languages	33	1.6%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **other West Germanic Languages** are Dutch and Yiddish. Examples of **Other Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. Examples of other **Slavic languages** are Bulgarian, Czech, and Ukrainian. **2012-2016 American Community Survey estimates in Table C16001.**

ii. Greater Nebraska Region 2

A. Region 2 is in the west, central part of the state and includes the following Nebraska Counties: Arthur, Blaine, Chase, Cherry, Dawson, Dundy, Frontier, Furnas, Gosper, Grant, Harlan, Hayes, Hitchcock, Hooker, Keith, Lincoln, Logan, McPherson, Perkins, Red Willow, Thomas. NDOL Career Centers located in Region 2, include:

- North Platte, 306 E, 6th, Ste 140, North Platte, NE 69104, Phone: (308) 535-8320
- Lexington, 1501 Plum Creek Parkway, 68850, Phone: (308) 324-2064

Table 4: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region 2

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	3,920	81.1%
Chinese (incl. Mandarin, Cantonese)	150	3.1%
Russian, Polish, or other Slavic Languages	27	0.6%
All Other Languages	734	15.2%

Examples of **other Slavic languages** are Bulgarian, Czech, and Ukrainian. **2012-2016 American Community Survey estimates in Table C16001.**

iii. Greater Nebraska Region 3

a. Region 3 is in the central part of the state and includes the following Nebraska Counties: Adams, Buffalo, Clay, Custer, Franklin, Garfield, Greeley, Hall, Hamilton, Howard, Kearney, Loup, Merrick, Nance, Nuckolls, Phelps, Sherman, Valley, Webster, Wheeler. In Region 3, there are two locations:

- Hastings Career Center located at 2727 W. 2nd St., Ste. 338, Hastings, NE 68901, Phone: (402) 462-1867.

- American Job Center, Grand Island located at 203 East Stolley Park Rd, Ste. A, Grand Island, NE 68801, Phone: (308) 385-6300

Table 5: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region 3

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	7,825	82.8%
Other Asian and Pacific Island Languages	256	2.7%
Vietnamese	238	2.5%
Arabic	175	1.9%
German or other West Germanic Languages	144	1.5%
Chinese (incl. Mandarin, Cantonese)	105	1.1%
French, Haitian, or Cajun	75	0.8%
All Other Languages	375	6.7%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **other West Germanic Languages** are Dutch and Yiddish. **2012-2016 American Community Survey estimates in Table C16001.**

iv. **Greater Nebraska Region 4**

- a. Region 4 is in the southeast part of the state and includes the following Nebraska Counties: Cass, Fillmore, Gage, Jefferson, Johnson, Nemaha, Otoe, Pawnee, Richardson, Saline, Seward, Thayer, York. In Region 4, there are three NDOL Career Centers:

- Beatrice Career Center located at 5109 W. Scott Rd., Ste. 413, Beatrice, NE 68310-7059, Phone: (402) 223-6060
- Nebraska City Career Center located at 917 Wildwood Lane, Room 104, Nebraska City, NE 68410-3312, Phone: (402) 873-3384
- York Career Center located at 510 Lincoln Ave., York, NE 68467-2997, Phone: (402) 362-5891

Table 6: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region 4

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	2,445	75.9%
Other Asian and Pacific Island languages	238	7.4%
Vietnamese	198	6.1%
German or other West Germanic languages	86	2.7%
Chinese (incl. Mandarin, Cantonese)	42	1.3%
French, Haitian, or Cajun	40	1.2%
Other Indo European languages	31	1.0%
All Other Languages	57	1.8%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **other West Germanic Languages** are Dutch and Yiddish. Examples of **Other Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. **2012-2016 American Community Survey estimates in Table C16001.**

iv. Greater Nebraska Region 5

- a. Region 5 is in the northeast part of the state and includes the following Nebraska Counties: Antelope, Boone, Boyd, Brown, Burt, Butler, Cedar, Colfax, Cuming, Dakota, Dixon, Dodge, Holt, Keya Paha, Knox, Madison, Pierce, Platte, Polk, Rock, Stanton, Thurston, Wayne. In Region 5, there are two NDOL Career Centers.
 - Columbus Career Center located at 3100 23rd St., Ste. 22, Columbus, NE 68601-3161, Phone: (402) 564-7160
 - Norfolk Career Center located at 105 E. Norfolk Ave., Ste. 120, Norfolk, NE 68701, Phone: (402) 370-3430

- **Table 7: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Region 5**

• Language or Language Group	• Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	• Percent of Limited English Speakers Who Speak English Less than "Very Well"
• Spanish	• 12,556	• 89.6%
• Other Asian and Pacific Island languages	• 400	• 2.9%
• Vietnamese	• 151	• 1.1%
• German or other West Germanic languages	• 96	• 0.7%
• All Other Languages	• 817	• 5.8%

- Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **other West Germanic Languages** are Dutch and Yiddish. **2012-2016 American Community Survey estimates in Table C16001.**

b. Omaha Workforce Development Area:

The Omaha Workforce Development Area includes the following Nebraska Counties: Douglas, Sarpy, and Washington located in the eastern part of the state. There is an American Job Center, Omaha Heartland Workforce Solutions located at 5752 Ames St, Omaha, NE 68104, Phone: (402) 444-4700.

The American Community Survey 2012-2016 estimates show that the Omaha Workforce Development Area has a total of 40,575 individuals that speak English less than "Very Well." This accounts for 6.0 percent if the population age 5 and older. The table below displays the top eight languages or language groups of people who spoke English less than "Very Well." Spanish speakers top the ranking with 66.8% of the individuals with language access barriers comprising 4.0 percent of the area's overall population age five and older.

Table 8: 2016 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Greater Omaha

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	27,099	66.8%
Other Asian and Pacific Island languages	4,058	10.0%
Other Indo-European languages	2,532	6.2%
Chinese (Incl. Mandarin, Cantonese)	1,208	3.0%
Vietnamese	1,037	2.6%
Arabic	866	2.1%
French, Haitian, or Cajun	820	2.0%
Russian, Polish, or other Slavic Languages	397	0.9%
All Other Languages	2,558	6.3%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **Other Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. Examples of **other Slavic languages** are Bulgarian, Czech, and Ukrainian. **2012-2016 American Community Survey estimates in Table C16001.**

c. Lincoln Workforce Development Area:

The Lincoln Workforce Development Area includes the following Nebraska Counties: Lancaster and Saunders. There is a Lincoln Job Center located at 1111 O Street, Suite 222, Lincoln, NE 68508, Phone: (402) 471-4474 and an American Job Center, Lincoln located at 1111 O Street, Suite 205, Lincoln, NE 68508, Phone: (402) 413-9236.

The American Community Survey 2011 - 2015 estimates show that the Lincoln Workforce Area has 13,470 people who speak English less than "Very Well". The table below displays the languages or language groups of people who spoke English less than "Very Well." Individuals speaking Spanish and Vietnamese are the two most prevalent language groups. However, the Lincoln Workforce Development Area has more language or language groups spoken by one percent or more of the limited English population than any other area.

Table 4: 2015 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Nebraska

Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	4,260	31.6%
Vietnamese	3,365	25.0%
Chinese (incl. Mandarin, Cantonese)	1,315	9.8%
Arabic	1281	9.5%
Other Asian and Pacific Island languages	946	7.0%
Other Indo-European languages	784	5.8%
Russian, Polish, or other Slavic languages	728	5.4%
Korean	258	1.9%
French, Haitian, or Cajun	151	1.1%
All other languages	382	2.8%

Examples of **Other Asian and Pacific Island Languages** include Thai, Lao, Burmese, Karen, Hmong, Japanese, Korean, Ilocano, Samoan, Hawaiian, or other Austronesian languages and Tagalog. Examples of **Other Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. Examples of **other Slavic languages** are Bulgarian, Czech, and Ukrainian. **2012-2016 American Community Survey estimates in Table C16001.**

V. Individuals Self-Identifying as Hispanic or Latino origin in Nebraska:

Because the majority of limited English speakers speak Spanish, it may be helpful for planning purposes to look at the change in the number of individuals who self-identify as Hispanic or Latino in the state. Overall, the state saw a 77% increase in the number of individuals in this self-identifying category from 2000 to 2010. Since then, according to Census American Community Survey 2016 5-year estimates, the population of individuals who self-identify as Hispanic or Latino origin has increased an additional 13.6% and now comprise 10.2% of the state's population.

U.S. Census Bureau, 2010 Census. 2012-2016 American Community Survey estimates in Table B03002.

VI. OET Language Assistance Measures:

NDOL field staff have access to LanguageLine for over the phone interpretation services in more than 240 languages. In addition, field staff may utilize LanguageLinc, which provides in-person interpretation. The Nebraska Commission for the Deaf and

Hard of Hearing maintains a list of certified American Sign Language interpreters, who may be contacted to provide sign-language interpretation on an independent contractor basis.

Likewise, if a customer enters an NDOL field office with their own interpreter, depending on their program guidance, field staff may accommodate the customer's desire for their own language interpreter. Individuals with language access barriers served by OET staff are responded to in a manner that is respectful and courteous. Staff persons who are contacted either by telephone, written communication, or personal contact will utilize LanguageLine to assist the customer. Individuals with language access barriers will receive the same level of service as all customers served by OET.

Brochures, signage, and complaint forms are available in multiple languages in all offices throughout the State. Use of these resources ensures that LEP individuals have equitable access to programs operated by the Office of Employment and Training. The OET maintains ongoing efforts to create and provide translation of Equal Employment Opportunity (EEO) brochures, posters, and customer materials.

VII. Notification to LEP Persons

OET staff have an obligation to provide notice about language access services, including providing signage in the job center and promoting language accessibility to community organizations, community colleges, and other local partners.

VIII. Accessibility of Information Online

a. NEworks

NEworks is the labor exchange, case management and reporting site for the OET programs. NEworks is currently available in both English and Spanish. NEworks is accessible at NEworks.nebraska.gov.

b. NDOL Website

The NDOL public website provides information for workers and employers. This includes information about job searching, training, the Workforce Innovation and Opportunities Act, and many additional programs and services. The NDOL site is accessible at dol.nebraska.gov.

The site features the option of selecting language translation services provided via Google Language Tools. The translation through Google utilizes an automated/computerized translation which serves as an approximation for the site's

original content. NDOL has provided a Translation Disclaimer Statement indicating potential issues with the automated translation process. Available languages listed on the NDOL site include: Spanish, Chinese, French, German, Italian, Korean, Russian, Polish, Arabic, Portuguese, Japanese, and Norwegian. The NDOL website provides information on how to contact local field staff for additional assistance.

c. Social Media

OET utilizes multiple social media platforms in order to improve and increase its public outreach. The social media platforms used include Facebook (facebook.com/Nebraska.DOL), Twitter (twitter.com/NE_DOL), and YouTube (youtube.com/user/NEDeptOfLabor).

At this time, all information published to social media platforms is published exclusively in English.

IX. Accessibility of Rapid Response Information to LEP Individuals

OET manages Nebraska's Rapid Response activities as the designated Dislocated Worker Unit. Rapid Response provides assistance to workers who are dislocated due to plant closures and substantial layoffs, and is a required activity under the Workforce Innovation and Opportunities Act (WIOA).

Rapid Response meetings provide information to dislocated workers about American Job Center services, WIOA training activities, Trade Adjustment Assistance, Unemployment Insurance benefits, LMI, financial counseling, federal financial assistance, and many other job-seeker services and programs. Many of the printed information guides disseminated during Rapid Response meetings are available in Spanish. Interpreter/translation assistance is provided at Rapid Response events as needed.

X. Training Staff:

Training on serving individuals with language access barriers will be conducted by the OET for staff. The OET LEP Coordinator, in conjunction with the agency monitor and the Equal Opportunity (EO) Officer or designee will coordinate, schedule and implement statewide training. LEP training will be conducted annually, with the training materials and topics being coordinated with the EO Officer or designee. Additional training sessions will be conducted via video conference alerting staff to any major changes necessitating alterations to the LEP plan that would directly influence daily activities. Likewise, training materials and tools are shared with staff

through meetings and emails as the OET or the LEP committee becomes aware of them. Some of these items include but are not limited to resources such as, I Speak Cards, free website translations services, federal initiatives and tools, Nebraska's Non-English Speaking Worker's Protection Act (Neb. Rev. Stat. § 48-2207 to 48-2214), U.S. Census data, and a translatable glossary of workforce terms.

The content, details and topics of training will be determined based upon the need across the state, recommendations by staff and also by the EO officer, as well as budget constraints.

The OET continues to implement the practice of promoting bilingual skills as part of the hiring practice. This has become a desired skill listed on most OET job announcements across the state. Applicants are not screened out if they do not have bilingual skills; however, it is desirable if bilingual skills are present in an applicant, as the OET strives to hire qualified candidates who possess bilingual skills in order to ensure access to services for LEP customers.

XI. Dissemination of OET's LEP Plan

The OET LEP Plan is accessible on NDOL's Manuals, Plans, and Reports page at dol.nebraska.gov/EmploymentAndTraining/LCRWP/WIOA/ManualsPlansReports.

VII. LEP Complaint Procedures

OET's complaint procedures provide the opportunity to receive feedback from individuals with language access barriers and ensures the process is accessible regardless of language barriers.

Individuals who think they have been subjected to discrimination involving LEP, Title VI, and related statutes may contact the Nebraska Equal Opportunity Commission at (402) 471-2024 or 1 (800) 642-6112. Individuals who think they have been subjected to discrimination under a WIOA Title I financially-assisted program or activity may file a complaint within 180 days from the date of the alleged violation with:

Angela Hansen-Kruse, EO Officer
Nebraska Department of Labor
550 S. 16th Street
P.O. Box 94600
Lincoln, NE 68509-4600
(402) 471-8358 TDD (800) 833-7352

For Assistance with Unemployment Insurance
TTY (402)471-0016

Auxiliary aids and services available upon request to individuals with disabilities.