

Title VI

Limited English Proficiency

Program Plan



Prepared by:

Kimberley Taylor-Riley

Director of Equity and Diversity, Lincoln Commission on Human Rights
Equal Employment Opportunity Officer for City of Lincoln
Title VI Co-coordinator

Lin Quenzer

Ombudsman, Mayor's Office
Title VI Co-Coordinator

Loren Mestre-Roberts

Outreach Coordinator, Lincoln Commission on Human Rights

Adopted (Date)

LEGAL BASIS FOR LANGUAGE ASSISTANCE REQUIREMENTS

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in Lau v. Nichols, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on Limited English Proficiency (hereinafter LEP) persons because such conduct constitutes national origin discrimination.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients and sub-recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The purpose of this Title VI LEP plan is to clarify the responsibilities of the City of Lincoln in fulfilling its obligations to LEP persons within its borders.

NOTICE TO THE PUBLIC

As referenced above, the Federal Government requires that each grantee notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI program. The notice must include:

- *A statement that the agency operates programs without regard to race, color, and national origin*
- *A description of the procedures that members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations*
- *A description of the procedures that members of the public should follow in order to file a discrimination complaint against the grantee*

The notice can be a separate document, such as a posted sign, a statement that is in another document, or a stand-alone document, such as a Title VI brochure.

At a minimum, a grantee must post a Title VI notice on its website and in the reception area and public meeting spaces of its offices.

Attachment A presents two (2) notices developed by the City of Lincoln, (hereinafter City) a longer "stand alone" statement and a shorter statement that can be included in another document in both English and Spanish.

I. COMPLAINT INSTRUCTIONS AND FORM

Federal financial recipients are required to have instructions for the public to follow and a form for the public to use for filing a Title VI complaint. Attachment B represents a form and instructions for filing a Title VI complaint developed by the City.

A. TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS

The City has enacted a procedure for the investigation of Title VI complaints. The Equity, Access and Diversity Plan provides for internal (initiated by City employees) investigations by the Director of Equity and Diversity who serves as the City's Equal Employment Opportunity Officer (hereinafter EEOO). The external investigations are conducted by the City Ombudsman's Office. Each of these parties, the EEOO and Ombudsman, serve as Title VI co-coordinators and report their investigatory data directly to the Mayor for final determination. The information set forth below concerning Title VI complaints is maintained by both the EEOO and the Ombudsman and is reported as required to all federal entities at the dictated intervals.

Type	Date	Summary	Status	Action(s) Taken
Complaints				
Investigations				
Lawsuits				

II. PUBLIC PARTICIPATION ELEMENT

Each Title VI program is to include a public participation plan that includes an outreach plan to engage minority and (LEP) populations. The plan may include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others. Other public participation methods include open Board/ council meetings, council meetings of cities and counties that provide local funding, transit/client advisory committees, public involvement efforts for transit development plans (TDPs), passenger surveys, marketing efforts, such as booths at fairs, and presentations to service and other organizations.

The City's transit services are provided by StarTran. StarTran has a Title VI plan that has been implemented specifically to address the issues surrounding public participation in this arena. As for the City at large, all board/council meetings are open to the public. These meetings are held in accessible locations and publicized by the department and through the City's website, are posted in the City/County building, appear on the Facebook pages of the involved departments, shared by the Diversity Outreach Coordinator, Loren Mestre-Roberts, (hereinafter Coordinator) during her interactions with the public, and through press releases on City operations and snow emergencies. StarTran provides transportation to the City/County Building for regular meetings and special meetings. In the event a meeting is anticipated to last past the usual transportation times, StarTran has agreed to offer transportation on a special schedule to accommodate the needs of the public. Interested parties can comment on the City budget and/or service provision at City Council meetings. Members of the public simply appear at the City Council meeting where the matter is scheduled to be addressed, place their name on the list of persons that wish to be heard, and speak to the Council in the open forum. Individuals can also send written feedback to their representatives or the entire Council by electronic or regular mail.

In general, the City engages in the following outreach activities: full-time employment of a Coordinator who provides presentations to the community at large regarding employment/housing discrimination and employment opportunities within the City. The Coordinator also attends community events and fairs on behalf of the City. Powerful exposure and presence have been gained through informational booths at events such as: Juneteenth, El Centro de las Americas Health and Human Services Fair, the Center for People in Need annual events, World Day on the Mall, New American's Taskforce functions, etc. Other divisions within the City such as Urban Development, Libraries, Aging Partners, the Fire and Rescue Department and the Police Department are some examples of agencies who reach out to the community to promote their services successfully at these venues.

III. LIMITED ENGLISH PROFICIENCY (LEP) ELEMENT

FTA requires that the Title VI program include a plan for providing language assistance to LEP persons. An LEP person is someone who speaks English less than very well. To document what languages are spoken by LEP persons and to help determine what language assistance efforts you should undertake, FTA requires that you analyze the following four factors:

- *the number and proportion of LEP persons served or encountered in your service area*
- *the frequency with which LEP individuals come into contact with your services*
- *the nature and importance of your services*
- *the language assistance resources potentially available to assist LEP persons*

The primary source data on LEP populations is the U.S. Census.

- **Table 1: U. S. Census C16001 Language spoken at Home for the Population 5 years and over demonstrates the number and proportion of LEP persons served or encountered in your service area.**

		United States		Nebraska		Lincoln city; Lincoln, NE Metro Area; Nebraska	
		Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:		286,433,395	+/-3,860	1,683,103	+/-345	237,719	+/-200
Speak only English		228,216,716	+/- 110,799	1,515,814	+/-2,687	210,627	+/- 1,111
Spanish or Spanish Creole:		36,170,544	+/-60,905	110,871	+/-1,948	10,151	+/-736
Speak English "very well"		19,737,426	+/-41,499	56,086	+/-1,861	6,182	+/-554
Speak English less than "very well"		16,433,118	+/-39,695	54,785	+/-1,721	3,969	+/-544
French (incl. Patois, Cajun):		1,320,191	+/-11,554	4,855	+/-688	1,172	+/-344
Speak English "very well"		1,045,013	+/-9,866	3,616	+/-591	901	+/-286
Speak English less than "very well"		275,178	+/-4,376	1,239	+/-274	271	+/-117
French Creole:		688,675	+/-11,480	146	+/-122	52	+/-68
Speak English "very well"		384,881	+/-7,052	138	+/-120	44	+/-66
Speak English less than "very well"		303,794	+/-7,558	8	+/-14	8	+/-14
Italian:		747,439	+/-7,523	1,117	+/-267	35	+/-32
Speak English "very well"		539,450	+/-5,430	894	+/-214	35	+/-32
Speak English less than "very well"		207,989	+/-3,813	223	+/-97	0	+/-74
Portuguese or Portuguese Creole:		682,323	+/-9,162	622	+/-266	338	+/-237
Speak English "very well"		405,981	+/-5,842	526	+/-241	304	+/-229
Speak English less than "very well"		276,342	+/-6,185	96	+/-59	34	+/-32
German:		1,102,500	+/-9,316	6,225	+/-520	1,323	+/-281
Speak English "very well"		914,497	+/-8,338	5,236	+/-468	1,111	+/-251
Speak English less than "very well"		188,003	+/-3,328	989	+/-205	212	+/-91
Yiddish:		154,939	+/-3,691	80	+/-72	19	+/-21
Speak English "very well"		103,455	+/-3,234	52	+/-43	19	+/-21
Speak English less than "very well"		51,484	+/-1,979	28	+/-31	0	+/-74
Other West Germanic languages:		282,668	+/-4,620	538	+/-165	75	+/-65
Speak English "very well"		217,064	+/-4,358	477	+/-149	75	+/-65
Speak English less than "very well"		65,604	+/-2,273	61	+/-44	0	+/-74
Scandinavian languages:		132,959	+/-3,333	561	+/-116	44	+/-36
Speak English "very well"		117,920	+/-3,002	518	+/-114	44	+/-36
Speak English less than "very well"		15,039	+/-929	43	+/-33	0	+/-74
Greek:		311,136	+/-5,786	256	+/-115	95	+/-97
Speak English "very well"		231,797	+/-4,370	177	+/-83	51	+/-64
Speak English less than "very well"		79,339	+/-2,413	79	+/-50	44	+/-43
Russian:		851,367	+/-11,598	1,408	+/-316	512	+/-170
Speak English "very well"		433,089	+/-7,062	942	+/-245	343	+/-134
Speak English less than "very well"		418,278	+/-6,864	466	+/-141	169	+/-76
Polish:		598,130	+/-8,893	1,158	+/-254	127	+/-126
Speak English "very well"		346,825	+/-5,681	931	+/-224	88	+/-109
Speak English less than "very well"		251,305	+/-5,154	227	+/-90	39	+/-37
Serbo-Croatian:		264,723	+/-6,448	675	+/-277	312	+/-215
Speak English "very well"		159,878	+/-4,265	440	+/-227	144	+/-115

Speak English less than "very well"	104,845	+/-3,313	235	+/-160	168	+/-148
Other Slavic languages:	313,323	+/-5,458	3,078	+/-415	681	+/-254
Speak English "very well"	195,564	+/-4,189	2,447	+/-336	450	+/-169
Speak English less than "very well"	117,759	+/-3,077	631	+/-180	231	+/-127
Armenian:	230,450	+/-5,784	16	+/-18	0	+/-74
Speak English "very well"	127,449	+/-4,019	16	+/-18	0	+/-74
Speak English less than "very well"	103,001	+/-3,329	0	+/-74	0	+/-74
Persian:	374,457	+/-8,187	579	+/-237	193	+/-105
Speak English "very well"	233,762	+/-5,940	290	+/-149	114	+/-74
Speak English less than "very well"	140,695	+/-3,879	289	+/-215	79	+/-67
Gujarati:	348,796	+/-7,403	426	+/-234	130	+/-171
Speak English "very well"	225,352	+/-5,820	281	+/-145	54	+/-74
Speak English less than "very well"	123,444	+/-3,369	145	+/-113	76	+/-99
Hindi:	606,174	+/-8,937	1,336	+/-422	239	+/-146
Speak English "very well"	477,425	+/-7,121	1,223	+/-413	218	+/-142
Speak English less than "very well"	128,749	+/-4,260	113	+/-64	21	+/-24
Urdu:	372,994	+/-10,189	360	+/-181	23	+/-22
Speak English "very well"	262,349	+/-7,371	258	+/-123	14	+/-23
Speak English less than "very well"	110,645	+/-4,122	102	+/-107	9	+/-14
Other Indic languages:	717,797	+/-11,582	1,009	+/-314	233	+/-161
Speak English "very well"	439,538	+/-7,472	601	+/-233	195	+/-149
Speak English less than "very well"	278,259	+/-6,604	408	+/-198	38	+/-50
Other Indo-European languages:	428,011	+/-8,604	1,288	+/-340	771	+/-314
Speak English "very well"	273,091	+/-5,806	990	+/-254	556	+/-229
Speak English less than "very well"	154,920	+/-4,692	298	+/-149	215	+/-137
Chinese:	2,723,002	+/-17,693	3,753	+/-611	1,524	+/-430
Speak English "very well"	1,220,085	+/-10,869	1,609	+/-335	658	+/-250
Speak English less than "very well"	1,502,917	+/-11,501	2,144	+/-419	866	+/-285
Japanese:	455,107	+/-7,302	1,182	+/-282	170	+/-117
Speak English "very well"	253,519	+/-4,700	772	+/-219	103	+/-89
Speak English less than "very well"	201,588	+/-4,342	410	+/-160	67	+/-62
Korean:	1,122,760	+/-13,901	992	+/-259	234	+/-156
Speak English "very well"	488,968	+/-7,243	574	+/-194	129	+/-133
Speak English less than "very well"	633,792	+/-9,223	418	+/-177	105	+/-81
Mon-Khmer, Cambodian:	206,648	+/-6,380	91	+/-82	41	+/-60
Speak English "very well"	99,061	+/-3,753	27	+/-41	13	+/-35
Speak English less than "very well"	107,587	+/-3,641	64	+/-61	28	+/-47
Hmong:	204,745	+/-5,833	46	+/-57	0	+/-74
Speak English "very well"	111,854	+/-4,356	35	+/-55	0	+/-74
Speak English less than "very well"	92,891	+/-3,477	11	+/-16	0	+/-74
Thai:	154,551	+/-4,515	577	+/-223	68	+/-94
Speak English "very well"	73,072	+/-2,827	288	+/-147	59	+/-93
Speak English less than "very well"	81,479	+/-2,966	289	+/-141	9	+/-15
Laotian:	153,469	+/-5,478	417	+/-172	50	+/-44
Speak English "very well"	76,716	+/-3,622	191	+/-86	23	+/-23
Speak English less than "very well"	76,753	+/-3,109	226	+/-129	27	+/-36
Vietnamese:	1,330,171	+/-15,786	6,952	+/-754	4,316	+/-536
Speak English "very well"	529,735	+/-8,513	2,825	+/-449	2,095	+/-381
Speak English less than "very well"	800,436	+/-9,657	4,127	+/-525	2,221	+/-359
Other Asian languages:	790,746	+/-8,660	3,663	+/-589	468	+/-260
Speak English "very well"	549,965	+/-6,945	2,109	+/-428	276	+/-175

Speak English less than "very well"	240,781	+/-5,502	1,554	+/-509	192	+/-179
Tagalog:	1,566,544	+/-13,007	1,742	+/-371	376	+/-210
Speak English "very well"	1,071,803	+/-10,252	1,372	+/-325	307	+/-185
Speak English less than "very well"	494,741	+/-6,678	370	+/-149	69	+/-74
Other Pacific Island languages:	403,803	+/-6,350	791	+/-268	320	+/-187
Speak English "very well"	250,255	+/-4,549	583	+/-210	243	+/-172
Speak English less than "very well"	153,548	+/-3,909	208	+/-107	77	+/-72
Navajo:	168,146	+/-2,985	13	+/-13	0	+/-74
Speak English "very well"	129,028	+/-2,902	13	+/-13	0	+/-74
Speak English less than "very well"	39,118	+/-1,398	0	+/-74	0	+/-74
Other Native North American languages:	199,130	+/-3,734	1,452	+/-302	326	+/-188
Speak English "very well"	168,926	+/-3,310	1,252	+/-264	326	+/-188
Speak English less than "very well"	30,204	+/-1,282	200	+/-134	0	+/-74
Hungarian:	90,976	+/-2,889	50	+/-34	0	+/-74
Speak English "very well"	63,953	+/-2,093	37	+/-25	0	+/-74
Speak English less than "very well"	27,023	+/-1,589	13	+/-22	0	+/-74
Arabic:	810,169	+/-13,481	3,505	+/-775	1,841	+/-737
Speak English "very well"	516,376	+/-9,283	1,916	+/-417	829	+/-355
Speak English less than "very well"	293,793	+/-6,854	1,589	+/-523	1,012	+/-465
Hebrew:	206,969	+/-5,538	130	+/-72	8	+/-13
Speak English "very well"	170,929	+/-4,665	124	+/-72	8	+/-13
Speak English less than "very well"	36,040	+/-2,071	6	+/-8	0	+/-74
African languages:	798,306	+/-9,553	5,148	+/-865	790	+/-247
Speak English "very well"	540,556	+/-8,327	2,612	+/-670	459	+/-171
Speak English less than "very well"	257,750	+/-5,128	2,536	+/-425	331	+/-127
Other and unspecified languages:	131,841	+/-3,772	181	+/-95	35	+/-53
Speak English "very well"	79,284	+/-2,500	132	+/-74	35	+/-53
Speak English less than "very well"	52,557	+/-2,284	49	+/-56	0	+/-74

Source: U.S. Census Bureau, 2007-2011 American Community Survey

- **Table 2: Contact between City and LEP Population by Department demonstrating the frequency with which LEP individuals come into contact with our services**

**Limited English Proficiency
Frequency of Contact with LEP Persons
City of Lincoln
2013**

Departments	Frequency				Language												
	Daily	Weekly	Monthly	Less frequently than monthly	SP	VT	ARA	RS	KR	CH	AL	FR	FAR	PO	BOS	HD	ASL
Accounting			X		X	X	X	X	X	X	X	X	X	X	X	X	X
Aging Partners		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Building & Safety		X			X	X											
Citizen Information Center			X		X	X		X									
City Law	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X
Finance Department		X			X	X	X	X	X	X	X	X	X	X	X	X	X
Fire Department		X			X	X	X										
Health Department	X				X	X	X		X	X	X	X	X				X
Lincoln Libraries	X				X	X	X	X	X								
Mayor's Office				X	X	X		X		X					X		
Parks and Recreation	X		X		X	X	X	X	X	X	X	X	X				
Personnel		X			X	X	X	X								X	
Planning Department				X	X	X	X										
Police Department	X				X	X	X	X			X		X		X		X
Public Works (Engineering)		X			X	X											
Purchasing			X		X	X	X	X	X	X	X	X	X	X	X	X	X
Solid Waste Management				X	X	X											
StarTran		X			X	X	X				X	X	X				
Street Maintenance		X			X												
Urban Development	X				X	X						X					
Water		X			X	X	X				X						
Water Business Office				X	X	X											
Watershed				X	X												
Totals	6	10	6	7	23	21	14	11	9	7	11	9	9	5	6	5	7

Frequency

Language

SP VT ARA RS KR CH AL FR FAR PO BOS HD ASL

Languages

- SP= Spanish
- VT= Vietnamese
- ARA= Arabic Languages
- RS= Russian
- KR= Karen
- CH= Chinese
- AL= African Languages
- FR= French
- FAR= Farsi
- PO= Polish
- BOS= Bosnian
- HD= Hindi
- ASL= American Sign Language

- ***Nature and Importance of the City's services.***

Lincoln Police Department and Lincoln Fire and Rescue actively recruit from underrepresented populations and collaborate with community agencies toward this end. Lincoln/Lancaster County Health Department offers maternal health care, diabetes services, advice on how to become/remain tobacco free, intervention with sexually transmitted diseases and prevention of same, and the 'safe kids' program addressing, among other things, appropriate car seat installation, water safety and fire prevention. All of these programs are offered in collaboration with community centers, schools and non-profit service providers for the benefit of the entire community but with a focus on provision of services to limited English proficient families. Additionally, the Personnel Department attends career fairs at local universities and distributes a 'job letter' weekly listing all open positions within the City. The 'job letter' is available on the City website and is forwarded to a number of organizations in an effort to notify all residents of employment opportunities with the City. The City Personnel Department also collaborates with the Nebraska Department of Labor in veteran hiring initiatives. On an infrequent basis, City Personnel also utilizes national search periodicals to conduct outreach.

The Urban Development Department has conducted focus groups and circulated a survey regarding need for future development in the City so that the community has input into planning and construction of community revitalization projects. Housing rehabilitation and home buyer services are also offered by this department to assist home owners with rehabilitation of their homes and provides guidance to potential home buyers as they endeavor to purchase a home. The Workforce Investment Office provides services to low-income adults, youth and dislocated workers. This office provides assessment, employment planning, financial aid for training and case management services.

Aging Partners offers centers for the nutritional information, social interaction and volunteer opportunities for older adults. . The Home Handyman Program is designed to allow persons that are 60 years and over to remain living in their homes of choice by providing services that help maintain a safe and healthy environment, Aging Partners assists residents with securing answers to their Medicare questions and offers personal and family services to assist seniors in obtaining information, exploring alternatives and arranging services. Parks and Recreation provides a myriad of opportunities for the community to socialize and be active, including 127 parks, a fishing pier, an amphitheatre for outdoor performances, playgrounds, community centers and youth community learning centers, youth team sports, golf, display gardens, tennis courts, swimming pools, walking/biking trails, a children's zoo and a nature center.

The Lincoln Commission on Human Rights investigates employment and housing discrimination within the City. This office houses the Outreach Coordinator that presents on these topics in the local high schools and non-profit community organizations. The investigators also serve this function upon request throughout the City. Brochures that detail the services offered by this office are translated into Arabic, Spanish, Russian and Vietnamese.

- ***Language Assistance Resources Potentially Available to Assist LEP persons.***

The City is a municipality that provides a number of services to the public as set forth immediately above. Some of these services are offered during the normal business day. Others are offered every day of the week including weekends and holidays.

The City has staff members that speak foreign languages. These individuals may be asked to translate sporadically in their assigned city office. The languages spoken include Spanish, Vietnamese, American Sign Language, French, Hindi, Laotian, and Arabic. These languages have been identified as additional language skills by city employees. Staff can serve as interpreters on occasion, but are not hired for this service as a primary function.

Lincoln Commission on Human Rights brochures are translated into Spanish, Vietnamese, Russian, and Arabic. The Citizen Information Center created a City of Lincoln Services Directory in multiple languages: English, Spanish, Vietnamese, and Arabic. StarTran offers bus guides in five (5) different languages: English, Spanish, Russian, Arabic, and Vietnamese. The City website also provides access to language translation through Google Translate. The City website is also accessible to the visually impaired.

Finance, Libraries, and StarTran provide translation options on their website, through Google Translation, for 33 languages. Lincoln Fire and Rescue Department, Urban Development, Building and Safety, and the Lincoln-Lancaster County Health Department have the same option available for 71 languages. Below please find the languages that are included in this list.

›Afrikaans	›Catalan	›Finnish	›Hungarian	›Latin	›Romanian	›Turkish
›Albanian	›Cebuano	›French	›Icelandic	›Latvian	›Russian	›Ukrainian
›Arabic	›Chinese (Simplified)	›Galician	›Indonesian	›Lithuanian	›Serbian	›Urdu
›Armenian	›Chinese (Traditional)	›Georgian	›Irish	›Macedonian	›Slovak	›Vietnamese
›Azerbaijani	›Croatian	›German	›Italian	›Malay	›Slovenian	›Welsh
›Basque	›Czech	›Greek	›Japanese	›Maltese	›Spanish	›Yiddish
›Belarusian	›Danish	›Gujarati	›Javanese	›Marathi	›Swahili	
›Bengali	›Dutch	›Haitian Creole	›Kannada	›Norwegian	›Swedish	
›Bosnian	›Esperanto	›Hebrew	›Khmer	›Persian	›Tamil	
›Bulgarian	›Estonian	›Hindi	›Korean	›Polish	›Telugu	
	›Filipino	›Hmong	›Lao	›Portuguese	›Thai	

Presently, we are creating a list of contract providers to provide interpreter services on an as needed basis to serve residents more efficiently. LanguageLinc currently provides interpretation services for

many of the City offices in several languages. Interpretation services can be face to face, via phone, or written translation services. The Commission for the Blind and Visually Impaired facilitates the provision of American Sign Language interpretation. The City also provides notice to cultural centers in our area to assist in distribution of information regarding City services (snow removal, trash removal, water restrictions) on a regular basis. LEP accommodation notices are to be incorporated into meeting agendas, included on our website and posted in the building. The Outreach Coordinator informs the community of the City's policy of nondiscrimination through her presentations at local community organizations/agencies such as Community Action Partnership of Lancaster and Saunders Counties, CenterPointe, Lincoln Public Schools, community and cultural centers, and non-profit agencies. The public is also advised that interpretation services may be provided if needed, for the purpose of the investigation of their discrimination complaint. Through the Mayor's Office, data is reviewed; service provision is standardized and updated according to both census and City department information to ensure languages in use in our community are provided. City staff are made aware that language assistance is available upon request from the public through their department director. The amounts vary by department and by demand, but between \$5,000 and \$10,000 per year is a reasonable estimate for these services.

Upon review of the four factors as set forth above, the City developed the following LEP plan:

IV. Identification of Persons in need of LEP Accommodation

The City endeavors to meet the needs of all of its residents in an effective and efficient manner. In every circumstance, the City attempts to meet the needs of its residents upon first contact. Language barriers sometimes represent an insurmountable hindrance to this goal. Below are tools that may be used by City departments to help identify persons who may need language assistance.

1. If records are normally kept regarding interactions with members of the public, the language of an LEP person may be included as part of the record.
2. Have language identification cards or Census Bureau "I speak cards" at customer service counters in City departments which invite LEP persons to identify their language needs to staff. In the event that staff cannot provide translation assistance at the initial contact with an LEP person, the cards are an excellent tool to identify language needs.
3. Posting notices in commonly encountered languages notifying LEP persons of language assistance to encourage LEP to self-identify and request accommodations in advance of their contact with City offices. Please see Attachment A referenced in the *Notice to the Public* section above.

V. Language Assistance Measures

When an interpreter is needed, in person or on the telephone, staff should first determine what language is required. The City can obtain interpreter services for most languages (i.e. Spanish, French, German, Chinese, and Vietnamese). Staff can contact one of the following available private interpreter services to determine what languages are offered: LanguageLinc Interpretation Services 402-473-2940

or 402-730-9054. Staff may be able to assist with written communications from LEP persons. If staff cannot, private interpreter services can provide translation services for a fee.

After the language has been identified, staff will then ascertain the reason for the visit/call and attempt to assist the resident during the initial contact whenever possible.

Use of informal interpreters, such as family or friends of the LEP person seeking service, or other customers, is discouraged, with minor children generally prohibited from acting as interpreters. However, when other options are limited or unavailable, children may be used to establish the language spoken, reason for the contact and to arrange a subsequent meeting with the LEP person. The use of informal interpreters shall be allowed at the insistence of the LEP person or in emergencies.

No staff may suggest or require that an LEP person provide an interpreter in order to receive services.

VI. Staff Training

As the posted notices will request that people in need of language accommodation contact the Lincoln Commission on Human Rights, each department Director/Manager will receive a list of resources including the prices for such services provided to facilitate securing services. This list will include service providers, community agencies, cultural centers and Census Bureau "I speak cards" that may be of assistance in identifying the language(s) spoken and the reason for the resident's contact with the City office. Each department will designate a staff member to handle the responsibility of obtaining the requested accommodation.

Staff, through their designated Director, will be provided with the LEP Plan. Staff will also be educated on procedures and services available. LEP Plan information will also be a part of the staff orientation process for new employees. Training topics may include the following:

- City LEP policy and procedures
- Understanding Title VI LEP responsibilities
- What language assistance services City utilizes
- Use of "I speak cards"
- Securing language interpretation/translation services
- Documentation of language assistance requests and
- How to handle a complaint.

VII. Providing Notice of Available Language Services to LEP Persons

Posting signs that language assistance is available in public areas such as intake areas, customer service areas and other entry points to City departments.

Statements may be placed in outreach documents indicating that language services are available from the City. Such statements could be placed in announcements, brochures, booklets, fliers, notices,

advertisements, agendas or recruitment information. Statements would be translated into the most common languages.

If a City department is presenting a topic that could be of potential importance to an LEP person or if a City department is hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, the department may have notices, fliers, advertisements, and agendas printed in an alternative language or provide notices on non-English language radio stations or media outlets about the available language assistance services and how to get them.

VIII. Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. City departments will reevaluate the LEP Plan on a regular basis. Consideration shall be given to changes in demographics, types of services, or other needs when determining the frequency of LEP Plan reevaluation.

Each reevaluation should examine all Plan components and assesses the following:

- The current LEP population in the City.
- How many LEP persons were encountered, what languages and were their needs met?
- Has there been a change in the types of languages where translation services are needed?
- Has the City's available resources, technology and/or financial circumstances changed as a result of this plan?
- Has the City fulfilled the goals of the LEP Plan?
- Were complaints received?
- Are identified sources of assistance still available and viable?

IX. Dissemination of the City's Limited English Proficiency Plan

The City will post the LEP Plan on its website at www.lincoln.ne.gov

Any person, including social service, non-profit, and law enforcement agencies and other community partners with Internet access will be able to access the LEP Plan. For those without personal Internet service, area libraries offer free Internet access. Please contact your local library to determine if this service is available. A copy of the LEP will be available in every department accessible to clients and residents. Copies of the LEP Plan will be provided to any person or agency requesting a copy.

Any questions or comments regarding this LEP Plan should be directed to the City Title VI co-
Coordinators:

Kimberley Taylor-Riley

Director of Equity and Diversity, Lincoln Commission on Human Rights
Equal Employment Opportunity Officer for City of Lincoln
555 South 10th Street #304
Lincoln, NE 68508
402 441 8691
Title VI Co-coordinator

And/or

Lin Quenzer

Ombudsman, Mayor's Office
555 South 10th Street #301
Lincoln, NE 68508
402 441 7511
Title VI Co-Coordinator

X. Complaints

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. As a recipient of federal financial assistance, Lincoln, Nebraska has in place a Title VI complaint procedure.

Please see Attachment B referenced in section I.A. above to review the Complaint form.