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DEPARTMENT OF LABOR

Office of Employment and Training Limited English Proficiency Plan

June 2019

Limited English Proficiency Plan NDOL Office of Employment and Training June 2019

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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 assistance 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:

2019 LEP Planning Committee

Lori Marquez, Scottsbluff (bilingual)
Tom Prescott, Omaha (bilingual)
Maria Rowan, OET (bilingual)
Vicki Pflasterer, Grand Island
Kathy Cedillo, Lincoln
Tamber Rouse, VSU

Dawn Carrillo, OET Kari Janssen, Beatrice Andrea Curtis, OET Omar Correa, OET (bilingual) Marcia Prideaux, Omaha

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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 2017 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.

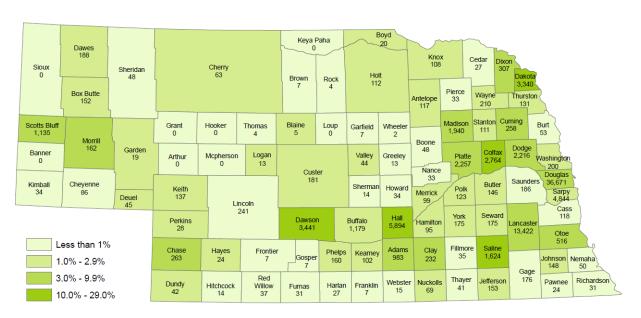
IV. Identifying Individuals with Language Barriers:

In Nebraska, there are an estimated 88,337 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 2013-2017 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 (36,671), Lancaster (13,422), Hall (5,894) and Sarpy (4,844) 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 (28.6 percent) of the population speak limited English. Other counties with high concentrations of individuals with language access barriers include Dakota with 17.8 percent, Dawson with 15.7 percent, Saline with 12.1 percent and Hall with 10.4 percent. A second group including Douglas, Platte, Chase, Madison and Dodge counties range from 6.0 percent to 7.4 percent, all above the statewide average of 5.0 percent. This group of 10 counties accounted for more than two-thirds (68.4 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	2764	28.6%
2	Dakota	3340	17.8%
3	Dawson	3441	15.7%

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4	Saline	1624	12.1%
5	Hall	5894	10.4%
6	Platte	2257	7.4%
7	Chase	263	7.2%
8	Douglas	36671	7.2%
9	Dodge	2216	6.5%
10	Madison	1940	6.0%
11	Dixon	307	5.7%
12	Lancaster	13422	4.7%
13	Clay	232	3.9%
14	Morrill	162	3.5%
15	Otoe	516	3.5%
16	Adams	983	3.3%
17	Scotts Bluff	1135	3.3%
18	Cuming	258	3.0%
19	Sarpy	4844	3.0%
20	Johnson	148	3.0%
21	Hayes	24	2.6%
22	Buffalo	1179	2.6%
23	Deuel	45	2.5%
24	Polk	123	2.5%
25	Wayne	210	2.4%
26	Jefferson	153	2.2%
27	Dawes	188	2.2%
28	Dundy	42	2.2%
29	Thurston	131	2.0%
30	Stanton	111	2.0%
31	Antelope	117	2.0%
32	Butler	146	1.9%
33	Phelps	160	1.9%
34	Custer	181	1.8%
35	Keith	137	1.8%
36	Nuckolls	69	1.7%
37	Kearney	102	1.7%
38	Logan	13	1.5%
39	Box Butte	152	1.5%
40	Knox	108	1.4%
41	Merrick	99	1.3%
42	York	175	1.3%
43	Cherry	63	1.2%
44	Holt	112	1.2%
45	Valley	44	1.1%
46	Hamilton	95	1.1%
47	Seward	175	1.1%
48	Blaine	5	1.1%
49	Garden	19	1.0%
50	Boyd	20	1.0%
51	Washington	200	1.0%
52	Perkins	28	1.0%

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53	Kimball	34	1.0%
54	Nance	33	1.0%
55	Sheridan	48	1.0%
56	Boone	48	1.0%
57	Saunders	186	0.9%
58	Pawnee	24	0.9%
59	Cheyenne	86	0.9%
60	Gage	176	0.9%
61	Burt	53	0.9%
62	Thayer	41	0.8%
63	Harlan	27	0.8%
64	Nemaha	50	0.7%
65	Lincoln	241	0.7%
66	Furnas	31	0.7%
67	Fillmore	35	0.7%
68	Thomas	4	0.6%
69	Greeley	13	0.6%
70	Howard	34	0.6%
71	Hitchcock	14	0.5%
72	Cass	118	0.5%
73	Pierce	33	0.5%
74	Sherman	14	0.5%
75	Webster	15	0.4%
76	Richardson	31	0.4%
77	Garfield	7	0.4%
78	Red Willow	37	0.4%
79	Gosper	7	0.4%
80	Cedar	27	0.3%
81	Rock	4	0.3%
82	Frontier	7	0.3%
83	Wheeler	2	0.2%
84	Franklin	7	0.2%
85	Brown	7	0.2%
86	Arthur	0	0.0%
87	Banner	0	0.0%
88	Grant	0	0.0%
89	Hooker	0	0.0%
90	Keya Paha	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 60,085 people who spoke Spanish comprised 68.0 percent of all limited English speakers in the state. Vietnamese with 5.5 percent was second in the ranking. The top eight categories below account for 90.0 percent of all individuals with language access barriers in Nebraska.

Table 1: 2017 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Nebraska

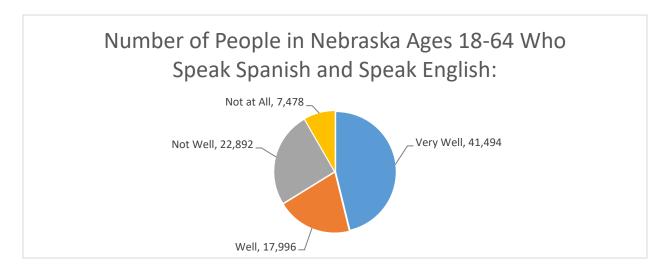
Language or Language Group	Number of Individuals 5 Years and Older Who Speak English Less than "Very Well"	Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	60,085	68.0%
Vietnamese	4,819	5.5%
Other languages of Asia	4,327	4.9%
Chinese (incl. Mandarin and Cantonese)	2,972	3.4%
Arabic	2,258	2.6%
Amharic, Somali, or other Afro-Asiatic languages	2,153	2.4%
Nepali	1,853	2.1%
Swahili or other languages of Central, Eastern, and Southern Africa	1,004	1.1%
All Other Languages	8,866	10.0%

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. Examples of Other languages of Central, Eastern, and Southern Africa include Ganda, Kinyarwanda, and Lingala. 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 2013-2017 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 four language or language groups with one percent or more of limited English speakers with Spanish topping the list at 84.9 percent. Within Greater Nebraska, there are marked differences between regions in the linguistically isolated populations. Greater Lincoln has eight language or language groups with one percent or more limited English speakers with Spanish at 33.9 percent. The Greater Omaha area has the highest number (nine) of language or language groups with one percent or more limited English speakers, consisting of Spanish with 65.7 percent followed by Other Asian and Pacific Island languages with 10.5 percent.

The American Community Survey 2013-2017 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 Not Well," and "Speak Spanish – Speak English Not At All." In Nebraska, an estimated 89,860 people speak Spanish and of those, 25.5 percent speak English "Not Well" and 8.3 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 2013-2017 estimates, the most recent data available for county level data, show that there were 33,014 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 84.9 percent for the Greater Nebraska region. This percentage varies across regions within Greater Nebraska from 90.3 percent in Region 5 to 77.5 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 eight in Region 4.

Table 2: 2017 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Greater Nebraska Workforce Development Area

Language or Language Group		Percent of Limited English Speakers Who Speak English Less than "Very Well"
Spanish	28,047	85.0%
Other Asian and Pacific Island languages	1,125	3.4%

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Vietnamese	615	1.9%
Chinese (incl. Mandarin, Cantonese)	414	1.3%
Other Indo-European languages	312	0.9%
German or other West Germanic languages	279	0.8%
Russian, Polish, or other Slavic languages	223	0.7%
Arabic	162	0.5%
All Other Languages	1,837	5.6%

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. **2013-2017 American Community Survey estimates in Table C16001**.

Nebraska Workforce Development Regions and Offices

Have veterans representatives on-site. (Representatives serve all locations on an as needed basis) EMAIL ndol.lincolnwfd@nebraska.gov american**job**center A proud partner of the HOURS 8 a.m. - 5 p.m. M - F ■ Norfolk Nebraska Department of Labor network PHONE (402) 471-4474 1111 0 Street, Suite 222 FAX (402) 471-9776 Lincoln, NE 68508 :::**&** NEBRASKA Good Life, Great Connections, DEPARTMENT OF LABOR American Job Center Limited hours (call ahead for availability) EMAIL ajclincoln@rescare.com Lincoln (Region 9) American Job Center, Lincoln HOURS 8 a.m. - 5 p.m. M - F PHONE (402) 413-9236 1111 0 Street, Suite 205 Lincoln, NE 68509-4600 Administrative Office FAX (402) 620-6221 550 S. 16th Street Lincoln, NE 68508 (2) For the most up-to-date office listing, go to dol.nebraska.gov/home/aboutus. EMAIL ndol.nebraskacitywfd@nebraska.gov EMAIL ndol.beatricewfd@nebraska.gov Omaha Heartland Workforce Solutions EMAIL ndol.omahawfd@nebraska.gov American Job Center, Beatrice 🚵 EMAIL ndol.yorkwfd@nebraska.gov Southeast (Region 4) HOURS 8 a.m. - 5 p.m. Tu and W 917 Wildwood Lane, Room 104 Nebraska City, NE 68410-3312 HOURS 8 a.m. - 5 p.m. M - F Omaha (Region 7) HOURS 8 a.m. - 5 p.m. M - F 5109 W. Scott Rd., Ste. 413 HOURS 10 a.m. - 3 p.m. M admin@hws-ne.org or by appointment 8 a.m. - Noon Th Beatrice, NE 68310-7059 PHONE (402) 223-6060 PHONE (402) 873-3384 PHONE (402) 444-4700 PHONE (402) 362-5891 American Job Center, FAX (402) 223-6088 FAX (402) 873-3552 York, NE 68467-2997 FAX (402) 362-5901 Nebraska City 🛇 Omaha, NE 68104 510 Lincoln Ave. 5752 Ames Ave. EMAIL ndol.northplattewfd@nebraska.gov EMAIL ndol.columbuswfd@nebraska.gov EMAIL ndol.lexingtonwfd@nebraska.gov EMAIL ndol.mccookwfd@nebraska.gov EMAIL ndol.norfolkwfd@nebraska.gov Mid-Plains (Region 2) HOURS 9 a.m. - 4 p.m. Tu and Th 1501 Plum Creek Parkway, Ste. 3 Northeast (Region 5) HOURS 8 a.m. - 5 p.m. M - F HOURS 9:30 a.m. - 2 p.m. M North Platte, NE 69101-4160 HOURS 8 a.m. - 5 p.m. M - F HOURS 8 a.m. - 5 p.m. M - F 105 E. Norfolk Ave., Ste. 120 or by appointment Columbus, NE 68601-3161 402 Norris Ave, Suite 304 PHONE (402) 564-7160 PHONE (402) 370-3430 PHONE (308) 324-2064 PHONE (308) 535-8320 PHONE (308) 345-8470 Columbus 👸 3100 23rd St., Ste. 22 Lexington, NE 68850 FAX (308) 324-6320 FAX (308) 535-8085 FAX (402) 563-2715 FAX (402) 370-4431 306 E. 6th, Ste. 140 McCook, NE 69001 Norfolk, NE 68701 North Platte 🙈 Lexington 🟵 McCook 🟵 Norfolk EMAIL ndol.grandislandwfd@nebraska.gov EMAIL ndol.scottsbluffwfd@nebraska.gov 8 EMAIL ndol.hastingswfd@nebraska.gov EMAIL ndol.alliancewfd@nebraska.gov EMAIL ndol.sidneywfd@nebraska.gov American Job Center, Grand Island Panhandle (Region 1) 1750 Sweetwater Ave., Room 009 203 East Stolley Park Rd, Ste. A HOURS 8 a.m. - 5 p.m. M - Th 8 a.m. - 4 p.m. F Central (Region 3) HOURS 8 a.m. - 5 p.m. M - F HOURS 8 a.m. - 5 p.m. M - F 2246 Jackson Street, Ste. A HOURS 8 a.m. - 5 p.m. M - F HOURS 8 a.m. - 5 p.m. M - F Scottsbluff, NE 69361-2708 505A Broadway, Ste. 300 Hastings, NE 68901-4684 2727 W. 2nd St., Ste. 338 PHONE (308) 632-1420 PHONE (308) 763-2935 Sidney, NE 69162-1443 PHONE (308) 254-4429 Grand Island, NE 68801 PHONE (308) 385-6300 PHONE (402) 462-1867 FAX (308) 763-2936 FAX (308) 632-1414 FAX (308) 385-6029 FAX (402) 462-1896 Alliance, NE 69301 Scottsbluff 🙈

i. Greater Nebraska Region 1

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, 1750 Sweetwater Ave., Room 013, Alliance, NE 69301 Phone: (308) 763-2935
- Scottsbluff, 505A Broadway, Ste. 300, Scottsbluff, NE 69361 Phone: (308) 632-1420
- Sidney, 2246 Jackson St, Sidney, NE 69162, Phone: 308-254-4429

Table 3: 2017 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	1,449	77.5%
Other Asian and Pacific Island languages	177	9.5%
Other Indo-European languages	88	4.7%
Chinese (incl. Mandarin, Cantonese)	46	2.5%
German or other West Germanic languages	39	2.1%
Korean	15	0.8%
Russian, Polish, or other Slavic languages	13	0.7%
Arabic	13	0.7%
All Other Languages	29	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. **2013-2017 American Community Survey estimates in Table C16001**.

Table 4: Percentage of Individuals Identifying as Hispanic

Region 1 Offices	Registered Individuals	WIOA Enrollments
Scottsbluff	24.27%	17.65%
Alliance	7.14%	0.00%
Sidney	9.19%	0.00%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

ii. Greater Nebraska Region 2

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, 600 E. Francis, Ste. 9, North Platte, NE 69104, Phone: (308) 535-8320
- Lexington, 1501 Plum Creek Parkway, Lexington, NE 68850, Phone: (308) 324- 2064
- McCook, 402 Norris Ave. Ste. 304, McCook, NE 69001, Phone: (308) 345-8470

Table 5: 2017 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	3,540	81.3%
Chinese (incl. Mandarin, Cantonese)	61	1.4%
Korean	29	0.7%
Russian, Polish, or other Slavic languages	27	0.6%
All Other Languages	695	16.0%

Examples of other Slavic languages are Bulgarian, Czech, and Ukrainian. 2013-2017 American Community Survey estimates in Table C16001.

Table 6: Percentage of Individuals Identifying as Hispanic

Region 2 Offices	Registered Individuals	WIOA Enrollments
North Platte	8.13%	15.00%
Lexington	26.87%	50.00%
McCook	0.00%	0.00%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

iii. Greater Nebraska Region 3

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 NDOL Career Center locations:

- Hastings, 2727 W. 2nd St., Ste. 338, Hastings, NE 68901, Phone: (402) 462-1867
- Grand Island (American Job Center), 203 East Stolley Park Rd, Ste. A, Grand Island, NE 68801, Phone: (308) 385-6300

Table 7: 2017 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	7,595	82.6%
Vietnamese	341	3.7%
Other Asian and Pacific Island languages	241	2.6%
Chinese (incl. Mandarin, Cantonese)	136	1.5%
Arabic	119	1.3%
German or other West Germanic languages	115	1.3%
Other Indo-European languages	92	1.0%
French, Haitian, or Cajun	74	0.8%
All Other Languages	482	5.2%

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. **2013-2017 American Community Survey estimates in Table C16001**.

Table 8: Percentage of Individuals Identifying as Hispanic

Region 3 Offices	Registered Individuals	WIOA Enrollments
Grand Island	24.42%	18.14%
Hastings	11.92%	6.44%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

iv. Greater Nebraska Region 4

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

Table 9: 2017 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	2,522	77.2%
Other Asian and Pacific Island languages	205	6.3%
Vietnamese	202	6.2%
Russian, Polish, or other Slavic languages	92	2.8%
Chinese (incl. Mandarin, Cantonese)	76	2.3%
Tagalog (incl. Filipino)	46	1.4%

German or other West Germanic languages	40	1.2%
Other Indo-European languages	32	1.0%
French, Haitian, or Cajun	15	0.5%
All Other Languages	36	1.1%

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. **2013-2017 American Community Survey estimates in Table C16001**.

Table 10: Percentage of Individuals Identifying as Hispanic

Region 4 Offices	Registered Individuals	WIOA Enrollments
Beatrice	9.79%	4.40%
Nebraska City	3.45%	0.00%
York	5.99%	0.00%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

v. Greater Nebraska Region 5

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, 3100 23rd St., Ste. 22, Columbus, NE 68601-3161, Phone: (402) 564-7160
- Norfolk, 105 E. Norfolk Ave., Ste. 120, Norfolk, NE 68701, Phone: (402) 370-3430

Table 11: 2017 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	12,941	90.3%
Other Asian and Pacific Island languages	499	3.5%
Chinese (incl. Mandarin, Cantonese)	95	0.7%
Other Indo-European languages	93	0.6%
Vietnamese	72	0.5%
German or other West Germanic languages	69	0.5%
All Other Languages	563	3.9%

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. 2013-2017 American Community Survey estimates in Table C16001.

Table 12: Percentage of Individuals Identifying as Hispanic

Region 5 Offices	Registered Individuals	WIOA Enrollments
Columbus	28.48%	79.25%
Norfolk	17.56%	27.54%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

b. Omaha Workforce Development Area:

The Omaha Workforce Development Area, located in the eastern part of the state, includes the following Nebraska Counties: Douglas, Sarpy, and Washington. 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 2013-2017 estimates show that the Omaha Workforce Development Area has a total of 40,575 individuals who speak English less than "Very Well." This accounts for 6.0 percent of 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 13: 2017 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	27,419	65.7%
Other Asian and Pacific Island languages	4,375	10.5%
Other Indo-European languages	2,637	6.3%
Chinese (incl. Mandarin, Cantonese)	1,185	2.8%
Vietnamese	1,047	2.5%
Arabic	846	2.0%
French, Haitian, or Cajun	758	1.8%
Russian, Polish, or other Slavic languages	512	1.2%
Korean	409	1.0%
Tagalog (incl. Filipino)	275	0.7%
German or other West Germanic languages	194	0.5%
All Other Languages	2,058	4.9%

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. Examples of **Other West Germanic Languages** are Dutch and Yiddish. **2013-2017 American Community Survey estimates in Table C16001**.

Table 14: Percentage of Individuals Identifying as Hispanic

Omaha Region	Registered Individuals	WIOA Enrollments
Omaha	9.94%	10.44%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

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) 471-2275 and an American Job Center, Lincoln located at 1111 O Street, Suite 205, Lincoln, NE 68508, Phone: (402) 413-9236.

The American Community Survey 2013 - 2017 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 six additional languages or language groups spoken by one percent or more of the limited English population.

Table 15: 2017 Number and Percent of Individuals Age 5 and Older Who Speak English Less than "Very Well" by Language or Language Group in Greater Lincoln

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	4,619	33.9%
Vietnamese	3,157	23.2%
Chinese (incl. Mandarin, Cantonese)	1,373	10.1%
Arabic	1,250	9.2%
Other Asian and Pacific Island languages	1,117	8.2%
Other Indo-European languages	798	5.9%
Russian, Polish, or other Slavic languages	513	3.8%
Korean	265	1.9%
German or other West Germanic languages	85	0.6%
French, Haitian, or Cajun	77	0.6%
Other and unspecified languages	354	2.6%

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 Indo-European languages** are Greek, Russian, Polish, Hindi, Albanian, and Swedish. Examples of **other Slavic languages** are Bulgarian, Czech, and Ukrainian. Examples of **Other West Germanic Languages** are Dutch and Yiddish. **2013-2017 American Community Survey estimates in Table C16001**.

Table 16: Percentage of Individuals Identifying as Hispanic

Lincoln Region	Registered Individuals	WIOA Enrollments
Lincoln	7.57%	9.94%

Information from NEworks: self-identified as Hispanic/Latino during Program Year 2016 (7/1/16-6/30/17).

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 2017 5-year estimates, the population of individuals who self-identify as Hispanic or Latino origin has increased an additional 18.5% and now comprise 10.5% of the state's population.

U.S. Census Bureau, 2010 Census. 2013-2017 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 <a href="https://doi.org/locale.com/doi.org/locale

VII. <u>LEP Complaint Procedures</u>

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.