FOUR FACTOR ANALYSIS
ASSESSING
LIMITED ENGLISH PROFICIENCY
AND
LANGUAGE ASSISTANCE PLAN

PREPARED BY
THE STATE OF NEBRASKA
DEPARTMENT OF ECONOMIC DEVELOPMENT

FOR
THE UNITED STATES
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PROGRAMS
INCLUDING
THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
&
THE HOME INVESTMENT PARTNERSHIPS PROGRAM
This information is available in Spanish or any other language upon request. Please contact Shannon Fortney at 402-890-4462 or at shannon.fortney@nebraska.gov for accommodations for this request.

Esta información está disponible en español o en cualquier otro idioma bajo petición. Por favor, póngase en contacto con Shannon Fortney al 402-890-4462 o en shannon.fortney@nebraska.gov de alojamiento para esta solicitud.
A. POLICY STATEMENT

It is the policy of the Nebraska Department of Economic Development (NEDED) to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). The NEDED’s policy is to ensure that staff will communicate effectively with LEP individuals, and LEP individuals will have access to important programs and information. NEDED is committed to complying with federal requirements in providing free meaningful access to its programs and activities for LEP persons.

B. HISTORY

Title VI of the Civil Rights Act of 1964 is the federal law which protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have Limited English Proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI’s prohibition against national origin discrimination.

Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

On August 11, 2000, Executive Order 13166, titled, “Improving Access to Services by Persons with Limited English Proficiency,” was issued. Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to…federally conducted programs and activities by eligible LEP persons…".

C. DEFINITIONS

Beneficiary: The ultimate consumer of HUD programs and receives benefits from a HUD Recipient or Sub-recipient.

Limited English Proficient Person (LEP): Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English because of national origin.

Language Assistance Plan (LAP): A written implementation plan that addresses identified needs of the LEP persons served.

Recipient: Any political subdivision of the State of Nebraska, or an eligible nonprofit organization, to whom Federal financial assistance is extended for any program or activity, or who otherwise participates in carrying out such program or activity, including any successor, assign or transferee thereof, but such term does not include any Beneficiary under any such program.
Sub-recipient: Any public or private agency, institution, organization, or other entity to whom Federal financial assistance is extended, through another Recipient, for any program or activity, or who otherwise participates in carrying out such program or activity but such term does not include any Beneficiary under any such program.

Vital Document: Any document that is critical for ensuring meaningful access to the Recipient’s major activities and programs by Beneficiaries generally and LEP persons specifically.

D. FRAMEWORK & METHODOLOGY

This Four Factor Analysis is the first step in providing meaningful access to federally funded programs for LEP persons. The Four Factor Analysis completed by NEDED addresses the following:

1. The number or proportion of LEP persons eligible to be serviced or likely to be encountered by NEDED;
2. The frequency with which LEP persons using a particular language come in contact with NEDED;
3. The nature and importance of the NEDED program or activity provided to the individual’s life; and
4. The resources available to NEDED, and costs associated with providing LEP services.

After completion of the Four Factor Analysis, NEDED will prepare a Language Assistance Plan (LAP) to address the needs identified in the Four Factor Analysis. The LAP will include the following:

1. The procedures NEDED will use to identify LEP persons with whom NEDED has contact, the size of LEP populations, and the languages of LEP populations.
2. Points and types of contact NEDED may have with LEP persons.
3. Ways in which language assistance will be provided by NEDED, and the plan for outreach to LEP populations.
4. NEDED’s plan for training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring Recipients of HUD funding.
5. A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.
6. NEDED’s plan for translating informational materials that detail services and activities provided to Beneficiaries and NEDED’s plan for providing appropriately translated notices to LEP persons.
7. NEDED’s plan for providing interpreters for large, medium, small and one-on-one meetings.
8. NEDED’s plan for developing community resources, partnerships, and other relationships to help with the provision of language services.
9. NEDED’s plan for monitoring and updating the LAP.
FOUR FACTOR ANALYSIS

1. **The number or proportion of LEP persons eligible to be served or likely to be encountered by NEDED.**

NEDED is the recipient of funding from the United States Department of Housing and Urban Development (HUD). This includes Community Development Block Grant Program (CDBG or CDBG Program) funds and HOME Investment Partnerships Program (HOME or HOME Program) funds. NEDED subgrants this funding to eligible Recipients throughout the State of Nebraska, and such Recipients undertake projects in specific services areas (i.e. within a particular local government, a group of counties, or other identified service area). NEDED does not often come into direct contact with LEP persons, as most direct contact with an LEP person occurs at the project level between the Recipient and the LEP person.

NEDED’s service area generally consists of the entire State of Nebraska, (although the City of Omaha, City of Lincoln, and City of Bellevue are each HUD entitlement communities). In order to determine the LEP population of Nebraska, NEDED reviewed the 2012 5-year American Community Survey (ACS) data (Table B16001) to find what the primary languages were for people that spoke English less than “very well”. Based on this data, in addition to English, Nebraska’s population speaks the following languages: Spanish (57,565 or 3.4%), Vietnamese (4,437 or 0.3%), Chinese (2,321 or 0.1%), Arabic (1,622 or 0.1%), French (1,502 or 0.1%), Other Asian languages (1,941 or 0.1%), and African Languages (2,848 or 0.2%). Other Asian languages and African languages both are composed of numerous languages and dialects, not any one specific translatable language.

This data shows that the Spanish speaking population is the largest LEP population in Nebraska; and therefore would likely be the LEP population most likely to be encountered by NEDED. Because NEDED does not directly provide assistance to individuals, NEDED also looked at the ACS data to determine what LEP populations are present on a county level.

HUD has established a “safe harbor” regarding the responsibility to provide translation of Vital Documents for LEP populations. This safe harbor is based upon the number and percentages of the service area-eligible population or current beneficiaries and applicants that are LEP. According to the safe harbor rule, HUD expects translation of Vital Documents to be provided when the eligible LEP population in the service area or Beneficiaries exceeds 1,000 persons or if it exceeds 5% of the eligible population or Beneficiaries along with more than 50 people. In cases where more than 5% of the eligible population speaks a specific language, but fewer than 50 persons are affected, there should be a translated written notice of the person’s right to an oral interpretation.
With the Spanish speaking population being the largest LEP population in Nebraska, NEDED has identified fifteen counties that have Spanish speaking LEP populations exceeding the 1,000 person or 5% threshold. These are depicted in the following table. With the exception of Lancaster County and Douglas County, no other Nebraska county has an LEP population other than the Spanish speaking population that exceeds the HUD safe harbor threshold.

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population</th>
<th>Estimate of Spanish Speaking LEP Population</th>
<th>Spanish Speaking LEP % of Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chase County</td>
<td>3,669</td>
<td>204</td>
<td>5.56%</td>
</tr>
<tr>
<td>Colfax County</td>
<td>9,495</td>
<td>2,181</td>
<td>22.97%</td>
</tr>
<tr>
<td>Cuming County</td>
<td>8,618</td>
<td>486</td>
<td>5.64%</td>
</tr>
<tr>
<td>Dakota County</td>
<td>19,160</td>
<td>2,965</td>
<td>15.47%</td>
</tr>
<tr>
<td>Dawson County</td>
<td>22,346</td>
<td>3,367</td>
<td>15.07%</td>
</tr>
<tr>
<td>Dixon County</td>
<td>5,585</td>
<td>344</td>
<td>6.16%</td>
</tr>
<tr>
<td>Dodge County</td>
<td>34,143</td>
<td>1,700</td>
<td>4.98%</td>
</tr>
<tr>
<td>Douglas County</td>
<td>477,944</td>
<td>22,268</td>
<td>4.66%</td>
</tr>
<tr>
<td>Hall County</td>
<td>53,910</td>
<td>5,325</td>
<td>9.88%</td>
</tr>
<tr>
<td>Lancaster County</td>
<td>266,216</td>
<td>3,915</td>
<td>1.47%</td>
</tr>
<tr>
<td>Madison County</td>
<td>32,105</td>
<td>2,029</td>
<td>6.32%</td>
</tr>
<tr>
<td>Platte County</td>
<td>29,831</td>
<td>1,606</td>
<td>5.38%</td>
</tr>
<tr>
<td>Saline County</td>
<td>13,412</td>
<td>1,198</td>
<td>8.93%</td>
</tr>
<tr>
<td>Sarpy County</td>
<td>146,110</td>
<td>3,126</td>
<td>2.14%</td>
</tr>
<tr>
<td>Scotts Bluff County</td>
<td>34,255</td>
<td>1,106</td>
<td>3.23%</td>
</tr>
</tbody>
</table>

2. The frequency with which LEP persons using a particular language come in contact with NEDED.

NEDED understands that the more frequently contact occurs with LEP persons, the more likely enhanced language services will be needed. However, NEDED does not provide direct assistance to individuals. NEDED awards HUD funds to Recipients that carry out eligible projects that benefit individuals in the service area. As such, LEP persons rarely come into contact with NEDED administered HUD-funded programs at the State level. However, it is possible that some citizen participation efforts may be directed to the State by persons seeking to participate in the annual planning process for NEDED programs.

3. The nature and importance of the NEDED program or activity provided to the individual's life.

NEDED understands that the more important the activity, information, services or program, or the greater the possible consequences of the contact to the LEP persons, the more likely language services are needed. The programs administered by NEDED result in Recipients of HUD funding from NEDED carrying out projects, and in some instances, providing direct assistance to LEP individuals and families. It is likely that the type of project activities proposed by the Recipient will impact the level and type of language assistance needed to be provided. At the NEDED level, it is most important for language assistance services be
provided for citizen participation efforts undertaken by NEDED, as this is when it is most likely that LEP individuals will come into contact with NEDED directly. It is also important that NEDED provide information to LEP persons that will allow them to file a complaint if they believe they have been denied the benefits of language assistance.

4. The resources available to NEDED, and costs associated providing LEP services.

NEDED has limited resources available for administration of HUD funded programs. These resources primarily come from the percentage of CDBG and HOME Program funding that is allowed to be used for administration of such programs. NEDED will use these administration funds to provide LEP services, in addition to using such funds for fulfilling all other statutory and regulatory requirements of these programs.

The costs associated with providing LEP services will vary depending upon the service provided. If NEDED uses existing resources, such as having NEDED staff members who are proficient in languages other than English assist in translation and/or interpretation, this will be a cost effective method of providing LEP services. Another cost effective method of providing LEP services would be to make LEP persons aware of the many brochures, handbooks, booklets, factsheets and forms that are available in multiple languages on the HUD website. NEDED may also, when appropriate, utilize free websites to translate written materials. The most costly option for providing LEP services would be to contract with outside persons that are proficient in interpretation of spoken word and in translation of documents. NEDED will do this when necessary. It is expected that the cost of obtaining such services will vary depending upon the nature of the services requested, and the service provider selected.
LANGUAGE ASSISTANCE PLAN

As a result of the preceding Four Factor Analysis, NEDED has developed a Language Assistance Plan. The Language Assistance Plan addresses the identified needs of the LEP persons NEDED serves, the process by which NEDED will monitor and update the LAP, and NEDED’s plan for ensuring Recipients of funding from NEDED fulfill LEP responsibilities.

NEDED understands that the actions NEDED is expected to take to meet its LEP obligations depend upon the results of the Four Factor Analysis including the services NEDED offers, NEDED’s service area, the resources NEDED possesses, and the costs of various language service options. However, NEDED is to take reasonable steps to ensure meaningful access to LEP persons. The meaningful access is based upon a reasonableness standard that is both flexible and fact-dependent.

1. The procedures NEDED will use to identify LEP persons with whom NEDED has contact, the size of LEP populations, and the languages of LEP populations.

   NEDED will review American Community Survey data as it is updated to determine the size of LEP populations and the languages of LEP populations within the State of Nebraska.

   NEDED will use its citizen participation process conducted on at least an annual basis in conjunction with preparation of the required Annual Action Plan to determine whether additional contact with LEP persons is likely to occur at the State level. This will be accomplished by including information in public notices for Annual Action Plan hearings regarding obtaining language assistance in order to participate in the planning process.

   NEDED staff persons will also interact with public hearing attendees and informally engage in conversation to gauge each attendee’s ability to speak and understand English. NEDED will keep records of language assistance requests in order to determine whether language assistance may be needed at future hearings.

2. Points and types of contact NEDED may have with LEP persons.

   LEP persons rarely come into contact with NEDED administered HUD-funded programs at the State level. However, NEDED is aware that LEP populations may wish to participate in the citizen participation efforts of NEDED, especially when NEDED is determining state and local needs and program policies. NEDED’s LAP focuses on the need for NEDED to ensure that individuals have access to citizen participation efforts, and that Recipients of HUD funding from NEDED fulfill their LEP obligations so as to ensure that the LEP community has access to appropriate language assistance.
3. Ways in which language assistance will be provided by NEDED, and the plan for outreach to LEP populations.

Language Assistance
NEDED will provide language assistance as requested, and as appropriate. NEDED has limited resources available for administration of HUD funded programs, and such resources must be used to provide LEP services in addition to fulfilling all other statutory and regulatory requirements of these programs. NEDED will provide language assistance as follows:

1. NEDED will maintain a list of identified NEDED staff members (and where possible other state agency employees) who are proficient in languages other than English who are willing to assist in translation and/or interpretation, and will make this list available to staff persons so that they can appropriately obtain language assistance services for LEP persons.

2. NEDED will use and make persons aware of the many brochures, handbooks, booklets, factsheets and forms that are available in multiple languages on the HUD website. Many of these are available at: http://www.hud.gov/offices/fheo/promotingfh/leptranslated.cfm

3. When, and if appropriate, NEDED may utilize free websites and computer programs to translate written materials.

4. As needed, NEDED will contract with entities that are proficient in interpretation of spoken word and translation of documents. NEDED will maintain a list of identified contractors.

5. When language assistance is needed via telephone, staff will immediately contact the individual from the NEDED internal list of staff persons proficient in the particular language and have such individual provide assistance; or in the alternative, the staff will seek assistance through Language Line. Language Line is a voice interpretation service provided by the Nebraska Office of the CIO-Network Services, which utilizes an interpreter for communicating with non-English speaking persons. NEDED will keep a copy of the instructions for using Language Line at the NEDED reception desk. These instructions are included in this Language Assistance Plan.

6. NEDED will provide, on a prior request basis, interpretation assistance for NEDED public hearings and/or meetings via staff persons proficient in the particular language requested; or in the alternative if no staff person is available to provide such assistance, the staff will seek assistance from a qualified contractor.

7. NEDED will translate Vital Documents, including but not limited to the Citizen Participation Plan and Complaint procedures, into Spanish (and other languages as need may be identified in the future).

Outreach
NEDED will conduct outreach to LEP persons as follows:

1. NEDED will provide notification to LEP persons of the availability of language assistance services (both interpretation and translation) through public notices published in conjunction with the Annual Action Plan, and on the NEDED website.

2. NEDED will provide a link on the NEDED website to the HUD translated materials site.
3. NEDED will provide its Recipients with technical assistance regarding their responsibilities to provide language assistance services to individuals in their jurisdiction and/or service area, and request information from them on how they will provide outreach to LEP persons in their jurisdiction and/or service area.

4. **NEDED’s plan for training staff members on LEP guidance and the LAP, including specific provisions for training staff that are responsible for monitoring Recipients of HUD funding.**

   NEDED will ensure that NEDED staff persons are given proper LEP training so that they are aware of their obligations to provide meaningful access to information and services for LEP persons. Staff associated with HUD funded programs will have a greater need for in-depth training, and NEDED will ensure such staff persons have been trained on providing language assistance and/or obtaining language assistance for LEP individuals. Training for these individuals will include the following:

   1. Staff persons will be trained on language assistance requirements by being made aware of applicable law and resources.
   2. Staff persons will be provided with a copy of the Four Factor Analysis and Language assistance Plan, and will be informed when such information is updated.
   3. Staff persons will be informed of other staff persons who are proficient in providing language assistance, and receive instructions on actions to take when LEP individuals are encountered, including instructions on the use of Language Line.
   4. Front desk receptionists will be trained on the use Language Line and on use of language identification cards, or “I speak cards”, which invite LEP persons to identify their language needs. I speak cards will be kept at the front desk.
   5. All staff persons that monitor Recipient’s will be trained on examining the efforts of Recipients to comply with LEP requirements. This will include the following: (1) evaluating whether the Recipient has completed a Four Factor Analysis; (2) determining whether such Four Factor Analysis necessitated the preparation of a Language Assistance Plan; (3) determining whether Recipient provided language assistance outreach and services as identified in the Language Assistance Plan; and (4) determining whether Vital Documents have been made available in appropriate languages.
   6. Supervisors and managers will be trained on language assistance requirements so that they can reinforce the importance of compliance and ensure implementation by staff.

5. **A list of Vital Documents to be translated, the languages into which they will be translated and the timetable for translations.**

   NEDED will translate Vital Documents into appropriate languages. Vital Documents are any documents that are critical for ensuring meaningful access to NEDED’s major activities and programs by beneficiaries generally and LEP persons specifically. Based upon the information gathered through completion of the Four Factor Analysis, NEDED has determined that the Citizen Participation Plan and complaint procedure contained in the NEDED program administration manuals are Vital Documents. The Citizen Participation Plan provides the plan for ensuring that citizens are aware of when activities will take place,
which will help ensure they have the opportunity to participate and/or request the necessary assistance to participate. The complaint procedure provides information on how to inform NEDED if an individual has a complaint against NEDED or its Recipient’s in administering funding. NEDED will translate both of these documents into Spanish. The Citizen Participation Plan will be translated prior to November of 2014, as NEDED will begin citizen participation efforts for the next Annual Action Plan at that time. NEDED plans to have the complaint procedure in the NEDED program administration manuals translated by January of 2015.

NEDED will document requests received for language assistance, observe interactions with LEP persons that occur as a result of the Vital Documents translated, continue to review American Community Survey data as it is updated, and determine whether there are other Vital Documents that need to be translated, or whether other languages are necessary.

NEDED will also ensure that public notices include a clause in Spanish, which informs individuals that they may request language assistance services in order to participate in the process addressed in the public notice.

6. NEDED’s plan for translating informational materials that detail services and activities provided to Beneficiaries and NEDED’s plan for providing appropriately translated notices to LEP persons.

Because the cost of translation can be high, NEDED will continue to evaluate the need for translation of informational materials, and consider the best way to undertake translation services. NEDED wishes to be resourceful in providing language assistance without compromising quality and accuracy of the language services provided. If NEDED receives a request for translation of materials, NEDED will proceed to have such materials translated into the language requested, unless it is determined that the requester would also be satisfied with a competent oral interpretation of the document (e.g. documents only a few pages in length), and the oral interpretation can be more promptly provided.

As explained in the Four Factor Analysis, NEDED does not provide services directly to beneficiaries, but instead provides funding to Recipients who then provide services to beneficiaries. Therefore, NEDED believes it is appropriate to focus upon ensuring Recipients are taking appropriate action to ensure notice of language assistance services is provided to LEP persons, and that documents that are identified as Vital Documents by Recipients are translated into appropriate languages.

7. NEDED’s plan for providing interpreters for large, medium, small and one-on-one meetings.

As part of NEDED’s citizen participation plan, NEDED will make the LEP persons aware that an interpreter can be provided without charge to allow for participation in public hearings or meetings. NEDED will require a request, in advance of the public hearing or meeting, for an interpreter to be provided. In the event a LEP person requests to have a family member or friend act as an interpreter for them at a hearing or meeting, NEDED will
make every effort to ensure the LEP person knows that NEDED will provide an interpreter free of charge. If the LEP person continues to insist upon use of such family member of friend, NEDED will inform the LEP person that they need to be confident that the family member or friend can provide quality and accurate interpretation. If the LEP person wishes to proceed with such individual as an interpreter, NEDED will accommodate for such interpretation assistance to occur at the hearing or meeting.

8. **NEDED’s plan for developing community resources, partnerships, and other relationships to help with the provision of language services.**

NEDED is aware that other Nebraska government agencies and entities have Language Assistance Plans. These include the Nebraska Department of Labor, the Nebraska Department of Health and Human Services, and the Nebraska Crime Commission, among others. NEDED will communicate with these agencies regarding their methods of LEP outreach and provision of language assistance services. Through this communication, NEDED will attempt to determine best practices for the provision of such services, and incorporate those into NEDED’s Language Assistance Plan.

NEDED will also communicate with community organizations that serve LEP populations. Such organizations include Lincoln Literacy, the Kearney Literacy Council, the Literacy Council of Grand Island, the Literacy Center of the Midlands and others that assist people of all cultures by teaching English language and literacy skills. Many of these organizations also partner with educational institutions, community groups, and churches to provide services to LEP persons. Identification of these groups through interaction with literacy skill providers will help NEDED become more aware of the needs that exist for language assistance services.

NEDED will provide Recipients with technical assistance regarding their responsibilities to provide language assistance services. In particular, NEDED will educate Recipients on HUD’s safe harbor provision for translation of written materials, and the requirement to provide reasonable, timely, oral language assistance to LEP persons. NEDED will require all Recipients to provide reasonable oral language assistance, and such assistance may involve use of an in-person interpreter or telephone line interpreter, as may be appropriate. NEDED will require Recipients in counties that have populations that exceed the HUD safe harbor threshold to complete a Four Factor Analysis, and where necessary prepare a Language Assistance Plan to address identified needs of LEP persons. NEDED will prepare a template that can be used as a starting point for Recipients in preparing a Language Assistance Plan. After provision of technical assistance and training, NEDED will monitor Recipients to evaluate action taken comply with LEP requirements and, where applicable, compliance with provisions contained in a Language Assistance Plan.

NEDED will make Recipients aware of LEP resources, especially those noted at the end of the Language Assistance Plan. In particular, NEDED will use the LEP video, “Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice.” This video, which is available as a streaming video on www.lep.gov, explains the language access requirements of Title VI and Executive Order 13166 through vignettes that expose the
problems resulting from the absence of language assistance. The video goes on to show how these same situations could have been handled more appropriately if the service provider took reasonable steps to provide meaningful access.

9. NEDED’s plan for monitoring and updating the LAP.

NEDED will monitor, maintain and update the Language Assistance Plan at least annually, and more frequently in response to new information. NEDED will review American Community Survey data as it is updated to determine the size of LEP populations and the languages of LEP populations within the State of Nebraska, review additional guidance provided by HUD, and update the Language Assistance Plan accordingly.

AVAILABLE LEP RESOURCES

HUD Frequently Asked Questions on the Final LEP Guidance:
h/lep-faq

HUD’s LEP Website:
http://www.hud.gov/offices/fheo/lep.xml

Federal LEP Website:
http://www.lep.gov/

LEP and Title VI Videos:

“I Speak” Card:

LANGUAGE LINE INSTRUCTIONS

The Office of the CIO-Network Services offers a voice interpretation service called Language Line which utilizes an interpreter for communicating with non-English speaking clients. A 10-digit Personal Code needs to be used to complete these calls. The 10-digit Personal Code consists of the area code and phone number from the State Agency phone from which you are placing the call.

The following is a brief reminder of the information contained in the Quick Reference Guide provided by Language Line Services.

When receiving a call:
1. Use Conference Hold to place the non-English speaker on hold.
2. Dial 1 800 874-9426
3. Press 1 for Spanish. Press 2 for all other languages. You may press 0 or stay on the line for assistance.

4. Enter on your telephone keypad or provide the representative: your 6-digit Client ID: 535010; Organization Name: State of Nebraska; Personal Code: 10 digit phone number.

5. Brief the Interpreter. Summarize what you wish to accomplish and give any special instructions.

6. Add the non-English speaker to the line.

When placing a call to a non-English speaker, begin at Step 2. If you need assistance when placing a call to a non-English speaker, you may press 0 to transfer to a representative at the beginning of the call.

Please Note: Language Line validates the 10 digit Personal Code against a list that has been provided to them by the State. If a valid State 10 digit Personal Code is not given to them, they will not process your call.

Please contact Renee Bramhall with the Office of the CIO at (402)471-4701 if you have any questions or would like additional information.

COMPLAINTS

If you believe that you have been denied the benefits of this Language Assistance Plan, you may file a written complaint by mail to:

LEP Program Coordinator
Nebraska Department of Economic Development
301 Centennial Mall South, 4th Floor
PO Box 94666
Lincoln, NE 68509-4666
Or by email to: shannon.fortney@nebraska.gov with a copy to libby.elder@nebraska.gov

If you need assistance in filing a written complaint, you may contact Shannon Fortney at 402-890-4462.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following address (or as otherwise directed by HUD):

Betty J. Bottiger
Director, Region VII Office of Fair Housing and Equal Opportunity
U. S. Department of Housing and Urban Development
400 State Avenue
Kansas City, Kansas 66101-2406
Betty.Bottiger@hud.gov