



Jacksonville Human Rights Commission
117 W. Duval Street, Suite 350
Jacksonville, FL 32202

City Of Jacksonville LIMITED ENGLISH PROFICIENCY (“LEP”) PLAN

OVERVIEW

Limited English Proficiency (“LEP”) is a term used to describe individuals who do not speak English as their primary language, and who have a limited ability to read, write, speak, or understand English. In order to continue to receive federal funds, recipient jurisdictions must provide services to LEP individuals, must maintain an LEP Plan which is continuously monitored, and must certify compliance with LEP obligations to various entities of the federal government from which the recipient jurisdiction receives funding.

The following matrix outlines the law and policies relating to obligations owed to LEP individuals:

LEGAL AUTHORITY FOR LEP COMPLIANCE

Title VI of the Civil Rights Act of 1964

- Federal law
- Enacted in 1964
- Considers all persons
- Contains monitoring and oversight requirements
- Factor criteria is required, no numerical/percentage thresholds
- Provides protection on the basis of race, color, and national origin
- Focuses on eliminating discrimination in federally funded programs

LEP Executive Order 13166

- Federal Policy for Executive Branch
- Signed in August 2000
- Considers eligible population
- Contains monitoring and oversight requirements
- Factor criteria is required, no numerical/percentage thresholds
- Provides protection on the basis of national origin
- Focuses on providing LEP persons with meaningful access to services using the “four factor” analysis

The U.S. Department of Justice (“DOJ”) and various federal agencies have developed guidance concerning the responsibility of recipients of federal funds to LEP individuals. The guidance is provided to ensure individuals in the United States are not excluded from participation in programs, services and activities receiving federal funds simply because they face challenges communicating in English.

The intent of the City's LEP Plan is to ensure meaningful access¹ to programs, services and activities provided or funded by the City where substantial numbers of residents do not speak or read English proficiently. The production of multilingual publications and documents, and/or interpretation at meetings or events, will be provided to the degree funding permits based on current laws and regulations.

A. DETERMINING THE NEED TO PROVIDE LEP ASSISTANCE

As a condition of funding, the City department/division or agency which receives federal funds² must take reasonable steps to ensure LEP individuals are afforded meaningful access to the information, programs, services and activities the department/division or agency provides to the public. There are four factors to be considered in determining "reasonable steps":

1. The number and proportion of LEP individuals in the eligible service area;
2. The frequency with which LEP individuals come in contact with the program, service or activity;
3. The importance of the program, service or activity; and
4. The resources available to each department/division or agency and the overall cost of providing LEP services

Federal guidance suggests recipients have substantial flexibility in determining what language assistance is appropriate based on a local assessment of these four factors.

1. The number and proportion of LEP person in the eligible service area:

One important step towards understanding the profile of individuals who could participate in programs, services and activities and information provided by the City is a review of Census data.

U.S. Census Bureau 2015-2019 American Community Survey data, attached as Exhibits A and B, shows that 48,462 persons, or approximately 38% of the City's population, are LEP individuals. The most recent census data and data on Duval County 9-1-1 calls for which telephone translation services were requested, attached as Exhibit C, suggests that Spanish is the predominant language of LEP individuals within the City. Further review of the most recent Census data and 9-1-1 calls suggests that the next most predominant language for City residents not proficient in English are Tagalog (Filipino) and "Other Asian" languages.

Those languages which fall under the category of "Other Asian" languages are listed on Exhibit B, which indicates that in the City the predominant "Other Asian" languages spoken by LEP individuals are Vietnamese, Chinese, Korean and Cambodian.

¹Meaningful access is defined as "...access that is not restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals."

²Whether directly, or as a "pass-through" to other recipients/sub-grantees.

In summary, Census data suggests Spanish is the predominant language spoken by LEP individuals in the City, and this prong of the “four-factor analysis” suggests that the City should provide Spanish language resources, with continued monitoring of the need for services in Tagalog (Filipino) and other Asian languages.

2. The frequency with which LEP persons come in contact with the program:

The next factor to analyze is the frequency with which persons who speak languages other than English interact with City departments/divisions or agencies. To help gauge this metric, a preliminary survey of interactions with LEP individuals will be solicited from each department/division and agency which provides “essential” services (see Section 3 below).

As LEP compliance is an ongoing obligation of recipients of federal funds, future surveys will be solicited from all of the City’s departments/divisions and agencies, and other tools will be used to monitor interactions with LEP individuals.

We also reviewed requests for telephone translation services received by Duval County’s 9-1-1 system. As may be expected, these requests reinforce Census data showing that Spanish is the language spoken by the majority of LEP individuals who interact with City government, with 5,780 requests for Spanish translation services in 2019.³

Evidence gleaned from the staff of the Jacksonville Human Rights Commission (the “JHRC”) and from colleagues in other City departments/divisions and agencies also suggests that requests for language assistance predominantly come from LEP individuals who speak Spanish. In order to continuously monitor the frequency of interactions between LEP persons and each department/division or agency, the JHRC has implemented a procedure for tracking and monthly reporting of language requests.⁴ In fiscal year 2020, the City’s departments/divisions and agencies received 1,983 requests from Spanish LEP individuals and three requests from Portuguese LEP individuals.

JHRC uses a third-party vendor, Language Line Solutions, to initially process requests from LEP individuals for immediate service. Language Line Solutions provides language interpretation in over 200 languages. For more in-depth language interpretation services, the JHRC uses Language Services International Corporation. The JHRC has Pre-Interview Questionnaires available in Spanish as well as housing brochures in Spanish, Tagalog (Filipino) and Russian.

In light of the forgoing, we believe this prong of the “four-factor” analysis militates in favor of making City services available in Spanish, with continued monitoring of the need for services in Tagalog (Filipino) and other Asian languages.⁵

³See Exhibit C.

⁴See Exhibit D.

⁵As to further monitoring, see below.

3. The importance of the service provided by the program:

While all departments/divisions and agencies provide valuable services, many departments/divisions and agencies do not provide programs, services or activities that are considered essential – i.e., the program, activity or service provides immediate or emergency assistance, emergency medical treatment, or services for basic needs (like food or shelter). The majority of essential services provided by the City fall under the operations of the Mayor's Office, in particular the Jacksonville Fire and Rescue Department ("JFRD") and the Jacksonville's Sheriff Office ("JSO"). Perhaps most notable in this regard are emergency management services and emergency medical services, which may truly involve life and death circumstances.

For guidance on hurricane or storm preparation, the City's Emergency Preparedness Division ("EPD") provides 79 language options on its website, JaxReady.com. The JaxReady mobile application offers access to 9 languages. The Emergency Preparedness Guide⁶ is also available on request in Braille through Disabled Services. All postings on JaxReady.com comply with ADA accessibility regulations.

EPD's website is the City's main avenue to quickly disseminate information in a variety of languages. Due to the translation feature on the website, all announcements made through the Joint Information Center leading up to and after the storm are released on the City's website, COJ.net, which features the same translation services mentioned above and are ADA compliant with regard to screen reading technology. Leading up to the storm, JFRD's Call Center functions are transitioned to 630-CITY, which provides the caller with the option to request language translation if needed.

Shelter openings and resource distribution sites are also posted on the City's website. The Red Cross provides interpreters/translators at evacuation shelters. To assist with communication, shelter kits contain picture boards and signs with common images. The EPD's inventory also includes UbiDuo communication devices.⁷

The majority of the City's recovery functions are performed through FEMA, which offers support online or by phone in multiple languages. The EPD, along with 630-CITY, provides instructions to contact FEMA for individual assistance when necessary. After the storm, instructions to contact FEMA are posted in Spanish in various publications.

⁶The full text of the 2020-2021 Emergency Preparedness Guide is available for translation into 79 different languages by utilizing the Google translate tab at the top of the website. JaxReady.com also has a language selection tab.

⁷The UbiDuo is a communication device that enables deaf, hard of hearing, and hearing impaired people to communicate face to face without any barriers. The device has two keyboards and screen devices that allow a deaf and a hearing person to carry on a conversation.

“Next-level” important programs, services, information and documentation are geared towards the maintenance of home, health and sustenance (and applications to programs and services related thereto) and these, too, mostly fall under the purview of the Mayor’s Office and the Chief Administrative Officer.⁸

The Duval County Court system has contractually provided language services for most languages, including Spanish and Tagalog (Filipino). The court system uses the iPad virtual translator as a back-up plan when an interpreter is not available. The Duval County Court system has a separate contract to provide ASL interpretation and translation services. In addition, the Duval County Court system is in the process of modifying and upgrading the kiosk located on the ground floor of the courthouse. Representatives of the Duval County Court system anticipate that the project will be completed by the end of 2021. Upon completion of the project, the kiosk will offer interactive services in the language of the person’s choice. The Duval County Supervisor of Elections also provides language translation services by telephone if a voter or anyone else requests such services.

As the wide span of programs, services and activities offered by each Department/division or agency makes it impossible to include an evaluation of the importance of each program, service and activity in this document, the JHRC will work with each department/division and agency to identify “important services” under the “four factor” analysis.

4. The resources available to each department/division or agency and overall cost:

Proper analysis of this prong of the “four factor” analysis should address both the available resources and overall costs to each department/division or agency in providing services in languages other than English.

As to resources, each department/division or agency has their own annual budget to draw upon for LEP compliance.

Resources other than financial are also considered. Here, too, each department/division or agency will have different human resources available to provide services to LEP individuals. The City will supplement the resources of each department/division or agency by providing a list of employees who can assist with translation/interpretation for LEP individuals.

As it relates to costs, analysis of this prong requires exploring those measures which can be taken to mitigate the costs associated with providing services to LEP individuals. For instance, all departments/divisions or agencies can achieve economies of scale by collectively sourcing vendors to provide live, telephonic, and video translation services.⁹

Technology improvements continuously drive down the cost of providing translation services, and for non-vital communications designed to impart general information, use of tablet or smart

⁸Most services are provided through the City’s Neighborhoods Department; the Parks, Recreation and Community Services Department; the Kids Hope Alliance, and the Jacksonville Journey.

⁹An ancillary benefit of having a single provider for such services is the relative ease of obtaining metrics relating to the second prong of the “four factor” analysis – i.e., the frequency with which LEP persons come into contact with a City program, service or activity. For more information regarding this, see below.

phone based applications may prove sufficient.

Balancing all of these considerations, the City's representatives believe that the departments/divisions and agencies currently have sufficient resources to provide information and programs, services and activities in Spanish to LEP individuals.

B. MEETING THE NEED TO PROVIDE LEP SERVICES

Once a department/division or agency with LEP obligations has identified "important services" in consultation with the JHRC, they will then need to make resources available to serve LEP individuals. Resources which may need to be employed include (but are not limited to):

- Assistance from readily available and present staff who speak the requested language;
- Assistance from other City staff who speak the requested language and can be made available;¹⁰
- Assistance with translation/interpretation from the person accompanying the LEP individual seeking access to the program, service or activity (to the extent authorized by the LEP individual seeking access to the program, service or activity, with consideration being given to the complexity of the information to be communicated);
- Translation applications/programs available on-line, or on tablets or "smart phones"¹¹;
- Partnerships with the Mayor's Hispanic Advisory Board, the Mayor's Asian Advisory Board, as well as other community and faith based resources;
- "I speak" flash-cards as used by the Census Bureau¹²; and
- "Language Line" type telephonic or internet based translation services.

The appropriateness of using any of the above resources will, of course, depend upon the context and importance of the program, service or activity the LEP individual seeks from the City. We believe that the use of a "Language Line" type service will be of particular benefit for several reasons, including, but not limited to the following:

¹⁰In this regard, the City's Employee Services Department (i.e., Human Resources) will work with 630-CITY to update and maintain a list of languages spoken by employees of each department/division or agency.

¹¹Such as "Google Translate," with recognition of the concerns use of such programs engender as detailed in the federal guidance found at <https://www.digitalgov.gov/2012/10/01/automated-translation-good-solution-or-not/>. While the City recognizes the concerns found at this guidance, we also recognize that the decision whether to use such programs depends on the importance of the information to be conveyed, as well as the continued improvements made to such programs since the issuance of the above guidance on October 1, 2012.

¹²See Exhibit E.

- Immediate initial assessment of the reason the LEP individual is seeking a City program, activity or service;
- Provision of information/assistance without delay, with future provision of information/assistance or services in the language spoken by the LEP individual, as warranted; and
- Ability to track the frequency of interactions with LEP individuals in order to continuously perform the “four factor” analysis.¹³

It is important to underscore that providing services to LEP persons does not mandate immediate translation of all documentation and information in all languages spoken by LEP individuals seeking service. Rather, relevant federal guidance is clear that readily available translated documentation and information is only required of “vital” documents for those languages identified through application of the “four factor” analysis (which, as indicated above, suggests Spanish is currently the sole language).

Federal guidance also sets forth examples of what constitutes “vital” documents¹⁴, which includes (but is not limited to):

- Administrative complaints, release, or waiver forms;
- Claim or application forms;
- Letters of findings;
- Public outreach or educational materials (including web-based material);
- Letters or notices pertaining to statutes of limitations, referrals to other federal agencies, a decision to decline to investigate a case or matter, or closure of an investigation, case or matter;
- Written notices of rights, denial, loss, or decreases in benefits or services;
- Forms or written material related to individual rights;
- Notices of community meetings or other case-related community outreach;
- Notices regarding the availability of language assistance services provided by the component at no cost to LEP individuals; and

¹³In order to continuously monitor the frequency of interactions between LEP persons and each department/division or agency, the JHRC has implemented a procedure for tracking and monthly reporting of LEP requests. The City tracks the date, location and manner of each LEP interaction, how the person identified themselves as a LEP individual, the primary language spoken by the LEP individual, and the number of LEP individuals served.

¹⁴See, e.g., the United States Department of Justice’s LEP Plan available at: <https://www.justice.gov/sites/default/files/open/legacy/2012/05/07/language-access-plan.pdf>

- Certain consent orders, decrees, Memoranda of Agreement, or other types of pleadings or litigation materials, within the discretion of the department/division or agency (or subordinate department).

As there are no uniform standards which would be applicable to all City departments/divisions and agencies, the JHRC will assist each department/division or agency with identifying “vital” documents. In so doing, initial efforts will focus on providing summary information of available services for in-person inquiries, and improved accessibility of online information as to services available for remote access. Identification of “vital” documents will occur in parallel with these efforts.

C. SAFE HARBOR PROVISIONS

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty.

A “safe harbor” means that if a recipient has created a plan for the provision of written translations under a specific set of circumstances, this will be considered strong evidence of the recipient’s compliance with its written translation obligations under Title VI.

Strong evidence of compliance with the recipient’s written translation obligations under the “safe harbor” provision includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of eligible persons to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

The “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable to provide.

Working with a liaison to each department/division or agency, the JHRC will consult with the department/division or agency on the advisability of the City availing itself of these “safe harbor” provisions.

D. OTHER CONSIDERATIONS

In conjunction with this LEP compliance plan, the JHRC will work with a liaison to each department/division or agency to ensure dissemination of this LEP compliance plan in Spanish, as well as in languages individually requested.

Dissemination will include, at a minimum, posting of this plan, in English and Spanish, on the JHRC’s website and distribution of hard copies to departments/divisions, agencies and

community and faith-based organizations.¹⁵ In short, the City will make all reasonable efforts to effectively disseminate information relating to the rights of LEP individuals under this LEP compliance plan.

A draft of this LEP compliance plan will also be submitted to the Mayor's Office for approval and to the Office of General Counsel ("OGC") for their review for legal sufficiency.

Upon final approval of this LEP compliance plan by the Mayor's Office and OGC, the LEP compliance plan will be distributed to all City departments/divisions and agencies.

E. COMPLAINT PROCESS

The City has implemented a "Title VI Policy and Complaint Procedures."¹⁶ This policy will be made available on-line in Spanish. Additionally, hard copies of this policy, in English and Spanish, will be provided to the liaison for each department/division or agency for further dissemination upon request.

F. FURTHER INFORMATION

Questions, concerns, or comments relating to this LEP compliance plan may be directed to:

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¹⁵This will include making this LEP plan immediately available in Spanish, Tagalog (Filipino) and other Asian languages to the Mayor's Hispanic Advisory Board and the Mayor's Asian Advisory Board.

¹⁶ The City's Title VI Policy and Complaint Procedures may be accessed at <http://www.coj.net/jhrc>.

Exhibit

A

Duval County, Florida

Percent of specified language speakers

Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
	Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"	Speak English less than "very well"	Percent speak English less than "very well"	Speak English less than "very well"	Margin of Error
Population 5 years and over	824,349	±2,634	94.4%	±0.3	48,462	±2,625	5.6%	±0.3
Speak only English	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	79,175	±2,903	62.0%	±1.7	48,462	±2,625	38.0%	±1.7
SPEAK A LANGUAGE OTHER THAN ENGLISH								
Spanish	36,308	±1,776	60.4%	±2.3	23,791	±1,663	39.6%	±2.3
5 to 17 years old	8,225	±851	78.2%	±5.3	2,297	±595	21.8%	±5.3
18 to 64 years old	25,076	±1,377	57.3%	±2.6	18,682	±1,372	42.7%	±2.6
65 years old and over	3,007	±402	51.7%	±5.7	2,812	±311	48.3%	±5.7
Other Indo-European languages	20,757	±1,720	68.1%	±2.7	9,731	±1,034	31.9%	±2.7
5 to 17 years old	3,820	±729	90.4%	±4.7	406	±213	9.6%	±4.7
18 to 64 years old	15,198	±1,350	68.9%	±2.9	6,852	±757	31.1%	±2.9
65 years old and over	1,739	±348	41.3%	±8.0	2,473	±630	58.7%	±8.0
Asian and Pacific Island languages	16,242	±1,390	57.5%	±3.8	12,028	±1,255	42.5%	±3.8
5 to 17 years old	3,012	±629	78.9%	±6.1	806	±222	21.1%	±6.1
18 to 64 years old	11,220	±958	55.6%	±3.9	8,964	±952	44.4%	±3.9
65 years old and over	2,010	±377	47.1%	±7.6	2,258	±394	52.9%	±7.6
Other languages	5,868	±954	66.8%	±5.3	2,912	±619	33.2%	±5.3
5 to 17 years old	1,464	±463	84.7%	±8.1	265	±137	15.3%	±8.1
18 to 64 years old	3,970	±607	64.5%	±5.6	2,182	±481	35.5%	±5.6
65 years old and over	434	±178	48.3%	±15.2	465	±193	51.7%	±15.2
CITIZENS 18 YEARS AND OVER								
All citizens 18 years old and over	661,210	±2,382	96.7%	±0.2	22,730	±1,682	3.3%	±0.2
Speak only English	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	50,839	±1,974	69.1%	±1.8	22,730	±1,682	30.9%	±1.8
Spanish	24,399	±1,343	69.5%	±2.5	10,718	±1,053	30.5%	±2.5
Other languages	26,440	±1,489	68.8%	±2.4	12,012	±1,242	31.2%	±2.4

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.

The 2015-2019 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.

Exhibit B

Table 37. Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Duval County, FL: 2009-2013
Release Date: October 2015

	Number of speakers ¹	Margin of Error ²	Speak English less than "Very Well" ¹	Margin of Error ²
Population 5 years and over	812,668	54	40,278	2,095
Speak only English at home	705,359	2,817	(X)	(X)
Speak a language other than English at home	107,309	2,821	40,278	2,095
SPANISH AND SPANISH CREOLE	47,971	1,604	17,012	1,034
Spanish	47,970	1,604	17,010	1,034
OTHER INDO-EUROPEAN LANGUAGES	28,213	2,206	10,232	1,354
French (incl. Patois, Cajun)	3,083	519	854	251
French	2,900	517	835	252
Patois	180	112	(D)	(D)
French Creole	3,425	749	1,510	477
Italian	1,099	362	213	101
Portuguese (incl. Portuguese Creole)	1,792	472	766	363
Portuguese	1,790	472	765	363
German (incl. Luxembourgian)	2,380	427	421	211
German	2,380	427	420	211
Yiddish	120	143	87	139
Other West Germanic languages	612	244	42	38
Pennsylvania Dutch	(D)	(D)	(D)	(D)
Dutch	300	109	30	34
Afrikaans	290	211	(B)	--
Scandinavian languages	102	75	33	31
Swedish	40	44	(D)	(D)
Danish	45	58	(B)	--
Norwegian	(D)	(D)	(D)	(D)
Greek	272	137	39	44
Russian	2,214	507	972	362
Polish	436	199	122	80
Serbo-Croatian languages	4,380	905	2,316	666
Serbocroatian	3,670	800	1,910	569
Croatian	345	191	165	127
Serbian	365	275	240	216
Other Slavic languages	684	265	245	138
Bielorussian	(D)	(D)	(D)	(D)
Ukrainian	295	177	150	111
Czech	100	121	45	65
Slovak	90	81	(D)	(D)
Bulgarian	150	115	(B)	--
Macedonian	(D)	(D)	(D)	(D)
Armenian	85	111	38	51
Persian	1,073	426	329	166
Hindi	1,267	585	179	131
Gujarati	663	348	199	130

	Number of speakers ¹	Margin of Error ²	Speak English less than "Very Well" ¹	Margin of Error ²
Urdu	211	129	48	62
Other Indic languages	1,657	583	785	478
India n.e.c. ³	250	170	160	145
Bengali	435	309	110	106
Panjabi	95	100	(D)	(D)
Marathi	80	86	(B)	--
Bihari	55	88	(B)	--
Nepali	620	534	460	473
Pakistan n.e.c. ³	(D)	(D)	(B)	--
Sinhalese	(D)	(D)	(B)	--
Romany	70	110	(B)	--
Other Indo-European languages	2,658	736	1,034	362
Jamaican Creole	110	121	(D)	(D)
Krio	115	187	(D)	(D)
Romanian	770	426	215	189
Welsh	(D)	(D)	(D)	(D)
Albanian	1,580	538	755	272
Lithuanian	(D)	(D)	(B)	--
Kurdish	(D)	(D)	(D)	(D)
ASIAN AND PACIFIC ISLAND LANGUAGES	24,487	1,262	10,394	1,032
Chinese (incl. Cantonese, Mandarin, other Chinese languages⁴)	2,533	711	1,207	370
Chinese	1,760	491	930	351
Cantonese	65	44	40	38
Mandarin	695	590	230	190
Formosan	(D)	(D)	(D)	(D)
Japanese	829	330	200	103
Korean	1,121	408	616	297
Mon-Khmer, Cambodian	1,066	392	672	250
Hmong	17	16	11	12
Thai	712	256	248	144
Laotian	211	165	132	120
Vietnamese	3,954	927	2,406	586
Other Asian languages	4,318	890	1,482	592
Uighur	115	152	90	137
Turkish	385	256	145	133
Telugu	1,700	509	270	124
Kannada	190	161	(B)	--
Malayalam	195	122	(D)	(D)
Tamil	755	333	155	132
Burmese	695	447	575	422
Karen	265	292	215	278
Kachin	(D)	(D)	(D)	(D)
Tagalog	8,941	1,021	3,043	555
Other Pacific Island languages	785	278	377	205
Indonesian	(D)	(D)	(D)	(D)
Balinese	(D)	(D)	(D)	(D)
Malay	(D)	(D)	(D)	(D)
Bisayan	165	128	50	72

	Number of speakers ¹	Margin of Error ²	Speak English less than "Very Well" ¹	Margin of Error ²
Sebuano	120	102	55	49
Ilocano	90	77	55	59
Pampangan	55	91	(B)	--
Carolinian	135	156	115	150
Chamorro	35	37	(B)	--
Samoan	80	105	(D)	(D)
ALL OTHER LANGUAGES	6,638	1,385	2,640	728
Other Native North American languages	70	67	31	43
Sahaptian	(D)	(D)	(D)	(D)
Muskogee	35	46	(D)	(D)
American Indian	(D)	(D)	(B)	--
Hungarian	211	249	141	183
Arabic	4,624	1,313	1,893	656
Hebrew	134	78	42	48
African languages	1,547	401	523	219
Amharic	235	166	110	94
Chadic	30	35	(B)	--
Cushite	85	97	(D)	(D)
Sudanic	45	62	40	60
Nubian	(D)	(D)	(D)	(D)
Swahili	70	79	25	39
Bantu	135	121	(D)	(D)
Fulani	305	324	(D)	(D)
Kru, Ibo, Yoruba	555	219	155	131
Efik	20	34	(D)	(D)
African	(D)	(D)	(B)	--
Other and unspecified languages	52	47	10	19
Estonian	(D)	(D)	(D)	(D)
Basque	(D)	(D)	(B)	--
Uncodable	(D)	(D)	(B)	--

Notes:

¹ Detailed-language estimates are rounded to the nearest multiple of five. Aggregate estimates (bold-face entries) are unrounded and appear in table B16001 (http://factfinder.census.gov/bkmk/table/1.0/en/ACS/13_5YR/B16001/0500000US12031). Detailed-language estimates may not sum to aggregate estimates because of rounding.

² Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data at http://www2.census.gov/programs-surveys/acs/tech_docs/accuracy/MultiyearACSAccuracyofData2013.pdf). The effect of nonsampling error is not represented in these tables.

³ N.E.C. stands for not elsewhere classified. These are languages where respondents indicated they spoke either Indian or Pakistan. For Indian, it cannot be determined if the respondent spoke a native American language or spoke a language from India. For Pakistan, respondents wrote in Pakistan but it cannot be determined which one of the languages spoken in Pakistan is actually being spoken. To distinguish these languages, n.e.c. is used to indicated they are not classified in any other language code.

⁴ This category includes literal write-ins of Chinese as well as Hakka, Kan, Hsiang, Cantonese, Mandarin, Fuchow, Formosan, and Wu.

(D) Data withheld to avoid disclosure.

(B) Either no sample observations or too few sample observations were available to compute an estimate.

(X) Question does not apply.

	Number of speakers ¹	Margin of Error ²	Speak English less than "Very Well" ¹	Margin of Error ²
--	---------------------------------	------------------------------	--	------------------------------

-- Either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.

Source: U.S. Census Bureau, 2009-2013 American Community Survey

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Exhibit C

911
Languages requiring
Telephone Translator Service
2019

Area	Country/Language	2010	2011	2012	2013	2014	2015	2016	2017	2019	Percent of Calls (2013)	Percent of Calls (2019)
Western Europe & Caribbean	French/French Canadian	10	9	12	41	72	11	16	10	3	0.048%	0.32%
	German/Flemish	1	2	0	1	0	0	2	0	0	0.000%	
	Greek	2	0	1	0	0	0	0	0	0	0.000%	
	Italian/Creole	17	15	20	23	0	0	28	7	0	0.000%	
	Italian	1	0	1	3	0	2	1	3	10	0.162%	
	Portuguese	16	22	17	22	0	9	14	35	7	0.113%	
	Swedish	0	0	0	0	0	0	0	0	0	0.000%	
Spanish	Spanish	2127	2098	1951	1917	2403	3275	3950	3760	5780	93.407%	93.41%
Eastern Europe & Russia	Albanian	6	10	11	62	0	5	5	11	19	0.307%	1.47%
	Bosnian	29	19	13	23	55	21	15	16	17	0.275%	
	Bulgarian	0	0	0	0	0	0	0	0	0	0.000%	
	Croatian	3	6	0	0	0	0	0	0	3	0.048%	
	Czechoslovakian	1	3	0	10	0	1	1	1	0	0.000%	
	Hungarian	0	0	0	0	0	2	2	7	3	0.048%	
	Macedonia - Yugoslavia	0	0	1	0	0	1	2	0	0	0.000%	
	Polish	1	1	0	0	0	3	2	4	0	0.000%	
	Romanian	1	2	0	1	0	1	1	4	8	0.129%	
	Russian / Ukrainian	20	29	14	21	0	19	19	32	40	0.646%	
Serbian	0	1	0	3	0	0	1	0	1	0.016%		
Middle East & Asia Minor	Arabic (Dinka, Nuer)	26	17	20	37	76	63	78	79	85	1.374%	1.89%
	Bengali (Bangladesh)	0	1	3	0	0	0	1	0	0	0.000%	
	Dari / Pashto (Afghanistan)	0	0	0	0	0	0	1	2	4	0.065%	
	Farsi (Iran)	4	6	1	17	0	10	14	5	20	0.323%	
	Hebrew	0	0	0	0	0	0	0	0	1	0.016%	
	Hindi/Punjab/Nepali (India)	5	2	7	16	0	5	4	4	1	0.016%	
	Urdu (Pakistan)	0	1	0	0	0	0	0	0	3	0.048%	
	Kurdish (N Iraq/SW Turkey)	0	0	0	0	0	1	0	0	0	0.000%	
	Turkish	0	1	3	0	0	2	6	0	3	0.048%	
	Armenian	0	0	0	0	0	0	0	0	0	0.000%	
Asia	Burmese - Karen - Chin -	20	12	15	112	86	14	30	19	16	0.259%	1.91%
	Cambodian /Khmer	5	1	1	0	0	1	7	2	5	0.081%	
	Cantonese (Hong Kong)	1	3	0	0	0	0	1	0	1	0.016%	
	Chinese/Taiwanese/	25	23	28	25	0	18	23	21	34	0.549%	
	Japanese	2	3	0	0	0	2	2	2	6	0.097%	
	Korean	5	5	8	5	0	5	6	6	6	0.097%	
	Laotian/Hmong	1	1	3	0	0	0	0	0	0	0.000%	
	Tagalog (Philippines)	0	3	7	6	0	8	9	7	8	0.129%	
	Thai	0	0	0	0	0	0	3	1	0	0.000%	
Vietnamese	29	26	27	47	0	36	32	22	42	0.678%		
Africa	African - (Gujarati - Somali - Swahili - Yoruba)	6	8	3	19	9	13	12	5	25	0.404%	0.48%
	Ethiopian-Amharic-Oromo-Tigrinya	4	12	13	0	0	3	5	16	5	0.081%	
	Nigeria Rwanda Ghana - Ibo - Akan - Kirundi	0	0	3	0	0	7	4	5	0	0.000%	
	Senegal- Mandingo Kno	0	0	0	0	0	0	0	1	0	0.000%	
Other										32	0.5%	0.517%
TOTAL CALLS		2368	2345	2183	2411	2701	3538	4297	4087	6188	100.0%	100.00%
TOTAL LANGUAGES			37	31	22	6	27	33	28	32		

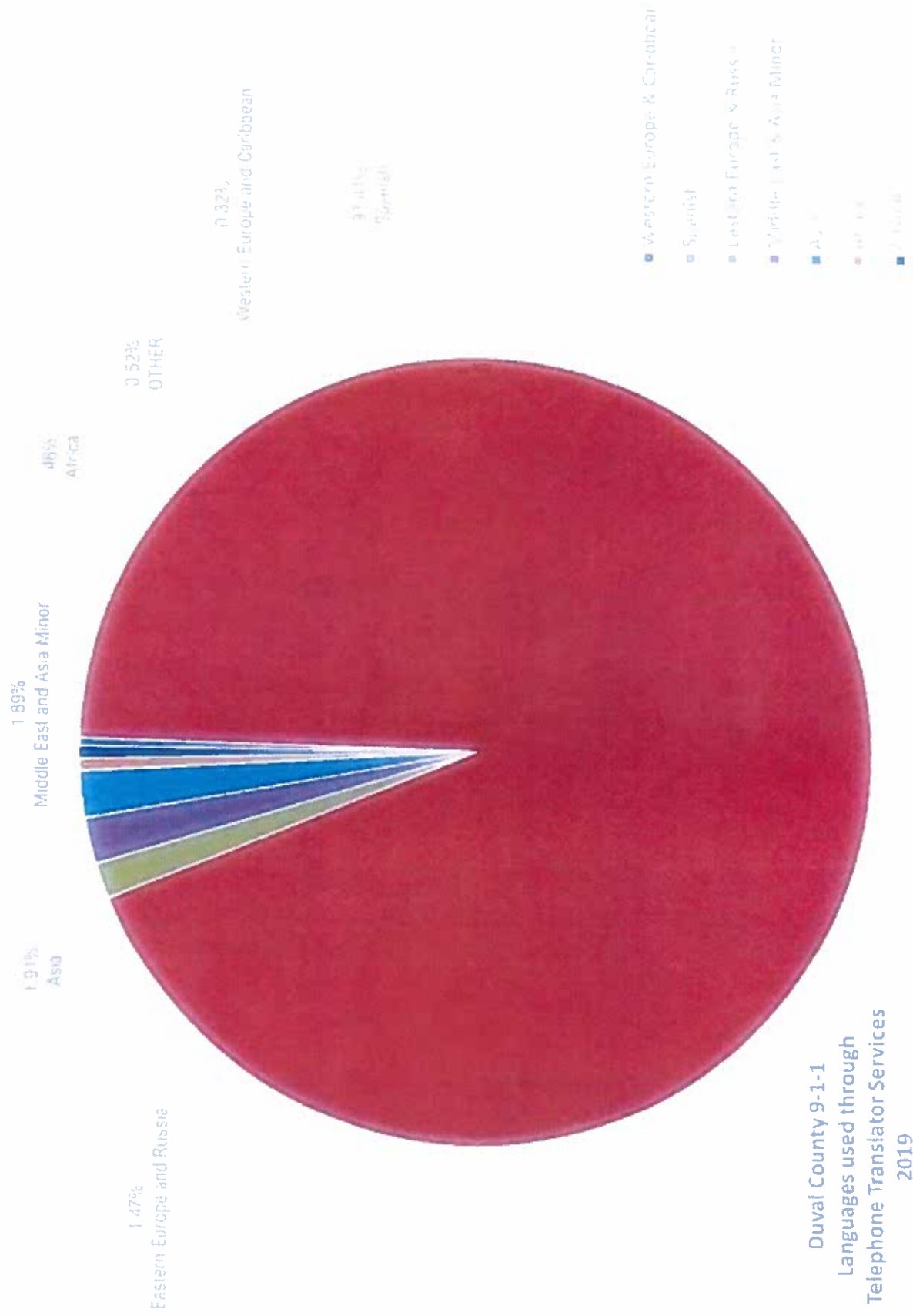


Exhibit D

LEP Tracking Sheet

Department	Date of Service	Location	Interaction	How Identified	Language translated	Number of LEP Individuals served
Neighborhoods	10/1/2019		Telephone	Self-identification by non-English speaker	Spanish	87
Neighborhoods	11/1/2019		Telephone	Self-identification by non-English speaker	Spanish	72
Neighborhoods	12/1/2019		Telephone	Self-identification by non-English speaker	Spanish	93
Neighborhoods	1/1/2020		Telephone	Self-identification by non-English speaker	Spanish	121
Neighborhoods	1/4/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Parks & Rec	1/14/2020		In person	Self-identification by non-English speaker	Portuguese	1
Parks & Rec	1/14/2020		In person	Self-identification by non-English speaker	Spanish	1
Parks & Rec	1/14/2020		In person	Self-identification by non-English speaker	Portuguese	1
Parks & Rec	1/22/2020		In person	Self-identification by non-English speaker	Portuguese	1
Neighborhoods	1/28/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	1/30/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	2/1/2020		Telephone	Self-identification by non-English speaker	Spanish	101
Neighborhoods	2/6/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	2/6/2020		In person	Self-identification by non-English speaker	Spanish	1
Neighborhoods	2/7/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	2/7/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	2/7/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	3/1/2020		Telephone	Self-identification by non-English speaker	Spanish	113
Parks & Rec	3/3/2020		In person	Self-identification by non-English speaker	Spanish	1
Neighborhoods	4/1/2020		Telephone	Self-identification by non-English speaker	Spanish	196
Neighborhoods	5/1/2020		Telephone	Self-identification by non-English speaker	Spanish	431
Neighborhoods	6/1/2020		Telephone	Self-identification by non-English speaker	Spanish	319
Neighborhoods	6/4/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	6/22/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	6/29/2020		Telephone	Self-identification by non-English speaker	Spanish	2
Neighborhoods	7/1/2020		Telephone	Self-identification by non-English speaker	Spanish	242
JHRC	7/20/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	8/1/2020		Telephone	Self-identification by non-English speaker	Spanish	187
Neighborhoods	8/7/2020		In person	Self-identification by non-English speaker	Spanish	2
JHRC	8/12/2020		Telephone	Self-identification by non-English speaker	Spanish	1
Neighborhoods	8/13/2020		Telephone	Self-identification by non-English speaker	Spanish	1
JHRC	8/17/2020		In person	Self-identification by non-English speaker	Spanish	1
JHRC	8/19/2020		Telephone	Self-identification by non-English speaker	Spanish	1
JHRC	9/16/2020		Telephone	Self-identification by non-English speaker	Spanish	1

Exhibit

E

- | | |
|--|------------------------|
| <input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> Խորհրդով ենք նշում կատարեք այս քառակուսով, եթե խոսում կամ կարդում եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

- | | | |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această căsuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратикъ уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้กาเครื่องหมายลงในช่องดำผ่านอ่านหรือพูดภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> | Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | 37. Vietnamese |
| <input type="checkbox"/> | באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |