

***Federal Transit Administration  
Title VI Program***

**Rockingham Nutrition & Meals on Wheels**

**July 10, 2023 of Plan Approval**

(Plan expires 3 years from date approved by the board)

## **Title VI Plan Table of Contents**

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**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: (July 10, 2023) \_\_\_\_\_

Adopted by: Rockingham Nutrition & Meals on Wheels  
Board of Directors \_\_\_\_\_

Chris Kelsey, Chairperson of RNMOW Board of Directors

Signature(s): Chris Kelsey

Approval:

## Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Rockingham Nutrition & Meals on Wheels will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: 02/08/2023

## Title VI Plan Revision Log

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
7/10/2023	3-year plan update	3-year plan update

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

The Rockingham Nutrition & Meals on Wheels Program, operating as a demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New Hampshire Department of Transportation (NHDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and NHDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. Rockingham Nutrition & Meals on Wheels operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### **Section 3: Notice to the Public**

#### **Title VI Notice to the Public**

Rockingham Nutrition & Meals on Wheels Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **Rockingham Nutrition & Meals on Wheels**

- Rockingham Nutrition & Meals on Wheels operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Rockingham Nutrition & meals on Wheels.
- For more information on Rockingham Nutrition & Meals on Wheels civil rights program, the procedures to file a complaint, or to file a complaint, please contact Helen Kostrzynski, Operations Director at 603-679-2201, email [Operations@RNMOW.org](mailto:Operations@RNMOW.org); or visit our administrative office at 106 North RD, Brentwood, NH 03833. For more information, visit [www.RockinghamMealsOnWheels.org](http://www.RockinghamMealsOnWheels.org)
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; [titlevi@dot.nh.gov](mailto:titlevi@dot.nh.gov)

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact 603-679-2201.

Rockingham Nutrition & Meals on Wheels Notice to the Public is posted in the public areas of the RNMOW sites and inside the transit vehicles.

1. 4 Pleasant Street, Epping NH 03042
2. 30 Court Street, Exeter NH 03833
3. 2 Terrace Drive, Newmarket NH 03857
4. 18 Greenough Road, Plaistow NH 03865
5. 311 Lafayette Road, Seabrook NH 03874

## **Section 4: Title VI Complaint Procedure**

**Rockingham Nutrition & Meals on Wheels** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.RockinghamMealsOnWheels.org](http://www.RockinghamMealsOnWheels.org)
  - Hard copy in the central office
  - Agency Title VI Plan
- 

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by **Rockingham Nutrition & Meals on Wheels** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with **Rockingham Nutrition & Meals on Wheels** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, **Rockingham Nutrition & Meals on Wheels** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

**Rockingham Nutrition & Meals on Wheels** has 45 days to investigate the complaint. If more information is needed to resolve the case, **Rockingham Nutrition & Meals on Wheels** may contact the complainant requesting further information. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, **Rockingham Nutrition & Meals on Wheels** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 10 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; [titlevi@dot.nh.gov](mailto:titlevi@dot.nh.gov)

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact **(603) 679-2201**.

**Section 5: Title VI Complaint Form**

**Rockingham Nutrition & Meals on Wheels** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www. RockinghamMealsOnWheels.org](http://www.RockinghamMealsOnWheels.org)
- Hard copy in the central office
- Agency Title VI Plan

**Rockingham Nutrition & Meals on Wheels**

**Title VI Complaint Form**

<b>Section I:</b>				
<b>Name:</b>				
<b>Address:</b>				
<b>Telephone (Home):</b>			<b>Telephone (Work):</b>	
<b>E-Mail Address:</b>				
<b>Accessible Format Requirements?</b>	<b>Large Print</b>		<b>Audio Tape</b>	
	<b>TDD</b>		<b>Other</b>	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No

<b>Section III:</b>		
<b>I believe the discrimination I experienced was based on (check all that apply):</b>		
<b>Title VI:</b> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
<b>Other (specify):</b> _____		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		
_____		
_____		
_____		
_____		
<b>Section IV</b>		
Have you previously filed a Civil Rights related complaint with this agency?	Yes	No
<b>Section V</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____		
<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.		
<b>Name:</b>		
<b>Title:</b>		
<b>Agency:</b>		
<b>Address:</b>		

Telephone:
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

**You may attach any written materials or other information that you think is relevant to your complaint.  
Signature and date required below**

<b>Signature</b>	<b>Date</b>

**Please submit this form in person at the address below, or mail this form to:**

**Rockingham Nutrition & Meals on Wheels  
Operations Director  
106 North Road  
Brentwood, NH 03833  
(603) 679-2201  
Operations@RNMOW.org**

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

Rockingham Nutrition & Meals on Wheels maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

  X   There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

       There have been investigations, complaints and/or lawsuits filed against us. *See list below.*  
       *Attach additional information as needed.*

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**Section 7: Public Participation Plan**

**Strategies and Desired Outcomes**

To promote inclusive public participation, **Rockingham Nutrition & Meals on Wheels** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

**Public Outreach Activities**

The public outreach and involvement activities conducted by **Rockingham Nutrition & Meals on Wheels** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Rockingham Nutrition &amp; Meals on Wheels Staffer(s) or Department</b>	<b>Activity</b>	<b>Communication Method (Public notice, posters, social media)</b>	<b>Notes</b>
	Drivers	Post inside bus	Public notice	Posted in all busses
	Managers	Posted at sites	Public notice & Brochure	Posted in all meal sites
5/19/2023	Director	Community meeting	Speaking event & Brochure	Community resource meeting every 6 months

## **Section 8: Language Assistance Plan**

### ***Plan Components***

As a recipient of federal US DOT funding, **Rockingham Nutrition & Meals on Wheels** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

**Rockingham Nutrition & Meals on Wheels** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s) served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

### ***Four Factor Analysis Methodology***

To determine if an individual is entitled to language assistance and what specific services are appropriate, **Rockingham Nutrition & Meals on Wheels** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** In addition to the number or proportion of LEP persons served, **Rockingham Nutrition & Meals on Wheels** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program:** Identifies and assesses the frequency **Rockingham Nutrition & Meals on Wheels** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;

- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.** Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 –Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

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

Of the 151,984 residents in **Rockingham Nutrition & Meals on Wheels** service area, 1,176 residents describe themselves as speaking English less than “very well.” For Rockingham Nutrition & Meals on Wheels service area, the latest U.S. Census Bureau data shows that among the area’s population 0.77% speak English “*less than very well.*” **of these groups, the top three** who speak English “less than very well”, 0.22% or 329 speak [Spanish], 0.19% or 291 speak [Chinese], 0.08% or 129 speak [Indo-European]

See Appendix A for AGENCY SPECIFIC AMERICAN COMMUNITY SURVEY DATA (ACS) FROM THE US CENSUS

**Factor 2: The frequency with which LEP persons come into contact with the program.**

Rockingham Nutrition & Meals on Wheels assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Rockingham Nutrition & Meals on Wheels provides approximately 8,832 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.**

All of Rockingham Nutrition & Meals on Wheels programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Rockingham Nutrition & Meals on Wheels is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, Rockingham Nutrition & Meals on Wheels will strive to provide alternative but meaningful accessibility. Moreover, Rockingham Nutrition & Meals on Wheels continually evaluates its programs, services, and activities to ensure that

persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in any language upon request.

**Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.**

Rockingham Nutrition & Meals on Wheels makes every effort to make its programs, services, and activities accessible to LEP individuals. Rockingham Nutrition & Meals on Wheels will use available resources, both internal and external to accommodate reasonable requests for translations. Anyone who qualifies for RNMOW transportation will be provided a ride regardless of the language they speak. Upon request, RNMOW will provide an interpreter or documents translated to the language they speak.

**Item # 2 – Description of how Language Assistance Services are Provided, by Language**

Rockingham Nutrition & Meals on Wheels has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as needed.
- b) Rockingham Nutrition & Meals on Wheels has partnered with The Language Bank to provide interpretation and translation services to those who need it. The Language Bank is available over the phone or for online video calls 24 hours a day with over 200 languages. In person services can be scheduled if needed.

**Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service**

In order to ensure that LEP individuals are aware of Rockingham Nutrition & Meals on Wheels language assistance measures, Rockingham Nutrition & Meals on Wheels provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and staff who interact with the public are provided “I Speak” language cards to identify language needs in order to match them with available services.

**Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated**

Rockingham Nutrition & Meals on Wheels will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in Rockingham Nutrition & Meals on Wheels service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.

- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Rockingham Nutrition & Meals on Wheels financial resources are sufficient to fund language assistance resources needed.
- Determine whether Rockingham Nutrition & Meals on Wheels has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Rockingham Nutrition & Meals on Wheels failure to meet the needs of LEP individuals.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will continue to be provided to Rockingham Nutrition & Meals on Wheels staff:

- Information on Rockingham Nutrition & Meals on Wheels Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

**Rockingham Nutrition & Meals on Wheels** shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with The Language Bank to obtain translators.

**If you need help with English, please call 603-679-2201**



**Section 9: Minority Representation Information**

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

**\*Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

**A. Minority Representation Table**

**Table Depicting Membership of Board, Committees, Councils, Broken Down by Race**

<b>Body</b>	<b>Caucasian</b>	<b>Hispanic</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>	<b>Two or More Races</b>
Not applicable						

*Note: insert the number of people and % of total board membership*

**B. Efforts to Encourage Minority Participation**

*To encourage participation on its boards, committees, and councils, the Insert Agency Name will make every effort to encourage minority participation on the boards. Detail any further efforts below.*

## **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

## **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

## **Section 12: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

Insert Agency Name:

is a fixed route transit provider

is **not** a fixed route transit provider

Appendix A - AGENCY SPECIFIC AMERICAN COMMUNITY SURVEY DATA (ACS) FROM THE US CENSUS

	Combined Service Area	
Label	Estimate	Percent of Population
Total:	151,984	
Speak only English	145,140	
Spanish:	1,949	1.28%
Speak English "very well"	1,620	1.07%
Speak English less than "very well"	329	0.22%
French, Haitian, or Cajun:	1,003	0.66%
Speak English "very well"	922	0.61%
Speak English less than "very well"	81	0.05%
German or other West Germanic languages:	834	0.55%
Speak English "very well"	798	0.53%
Speak English less than "very well"	36	0.02%
Russian, Polish, or other Slavic languages:	214	0.14%
Speak English "very well"	190	0.13%
Speak English less than "very well"	24	0.02%
Other Indo-European languages:	903	0.59%
Speak English "very well"	774	0.51%
Speak English less than "very well"	129	0.08%
Korean:	267	0.18%
Speak English "very well"	161	0.11%
Speak English less than "very well"	106	0.07%
Chinese (incl. Mandarin, Cantonese):	517	0.34%
Speak English "very well"	226	0.15%
Speak English less than "very well"	291	0.19%
Vietnamese:	0	0.00%
Speak English "very well"	0	0.00%

	Estimate	Percent of Population
Speak English less than "very well"	0	0.00%
Tagalog (incl. Filipino):	406	0.27%
Speak English "very well"	389	0.26%
Speak English less than "very well"	17	0.01%
Other Asian and Pacific Island languages:	491	0.32%
Speak English "very well"	377	0.25%
Speak English less than "very well"	114	0.08%
Arabic:	140	0.09%
Speak English "very well"	109	0.07%
Speak English less than "very well"	31	0.02%
Other and unspecified languages:	120	0.08%
Speak English "very well"	102	0.07%
Speak English less than "very well"	18	0.01%