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Introduction

Why is language access important?

According to the United States Census Bureau, about 20% of Marion’s residents currently speak a language other than English at home, and about 8% of residents report speaking English less than “very well.” Since the 1990s, McDowell County has seen one of the highest rates of growth in population of residents with Latin American ancestry, an over 900 percent increase of Hispanic residents between 1990 and 2000.\(^1\) The City of Marion is dedicated to creating a welcoming and inclusive environment, providing quality services, and fostering civic engagement and leadership opportunities for all residents. The City recognizes the role that language access plays in providing equitable services and in increasing engagement with community members.

Language access initiatives recognize linguistic diversity and are particularly important in rural areas such as McDowell County, where Marion is located, since language affects access to services, resources, and economic opportunities. Providing effective communication services in residents’ preferred languages is part of the City’s goal to foster civic engagement, an essential factor in its overall growth. Language access is an important step toward integration, civic participation, and well-being of all residents.

The City of Marion’s Language Access Plan (LAP) outlined here recognizes Marion’s linguistic diversity and establishes policies, procedures, and an implementation plan to ensure that all residents have meaningful access to City services, information, and opportunities in the languages they prefer to speak. It builds upon the City of Marion’s Non-Discrimination policy, which, in accordance with Title VI of the Civil Rights Act of 1964, ensures that no person shall be excluded from participation in any City program or activity based on level of English proficiency or national origin, among other factors. It also expands upon previous language access plans that the City developed in 2010,\(^2\) 2016,\(^3\) and 2020,\(^4\) revising guidance for providing services like interpretation and translation. The LAP presented here is comprehensive, applying to all City departments and services unless otherwise indicated. It is also a living document meant to be revisited and updated to reflect changes in Marion’s demographics, to incorporate new community input, and to build staff language access capacity over time.

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What is the federal mandate for language access?

Federal laws and policies guarantee people access to written, verbal, or visual materials or services in their preferred languages.\(^5\) Title VI of the Civil Rights Act of 1964, 42 U.S.C §§ 2000d - 2000d-7 (Title VI) and its regulations provide that no person – on the ground of race, color, or national origin – is excluded from, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance.\(^6\) Other federal laws and regulations also have a similar prohibition on race, color, and national origin discrimination. Executive Order 13166, issued in 2000, required federal agencies to issue Title VI guidance to recipients of federal financial assistance.\(^7\)

Background on the City of Marion’s Language Access Plan

In 2023 and 2024, the City of Marion worked with the Building Integrated Communities Program (BIC) at the Institute for the Study of the Americas at UNC-Chapel Hill and with local residents and community-based organizations, including Centro Unido Latino-Americano (CULA), to identify strategies and policies for language access. Marion’s BIC team met monthly between May 2023 and May 2024 to discuss language access best practices, identify community priorities for language access services, analyze demographic data and information on the City’s existing language access capacity, and to decide on priorities for the City’s revised Language Access Plan. Additionally, the team drew on guidance and expertise from the United States Department of Justice, the Migration Policy Institute, and other BIC partners across North Carolina.

The Marion BIC team consisted of the following members:

**City of Marion:**

- Beth Lytle, Administrative Specialist, Public Works
- Brian Bartlett, Building Inspector/Code Enforcement Officer, Planning and Development
- DJ Barrier, Support Services Lieutenant/Training Coordinator, Marion Police Department
- Heather Cotton, Director, Planning and Development
- Kathleen Nolan, Director, Human Resources
- Landdis Hollifield, former City Clerk/Public Information Officer
- Ray McDaniel, Fire Chief, Marion Fire Department
- Sarah Dhunjishaw, Lead for North Carolina Fellow
- Vance McNees, City Planner II, Planning and Development
- Vanessa Rangel, Customer Service Representative, Finance

**Centro Unido Latino-Americano:**

- Carlos Lopez, Youth Engagement Coordinator
- Laura Galindo, Program Director

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• Laura Zapater, Associate Director
• Margarita Ramirez, Executive Director

University of North Carolina-Chapel Hill, Institute for the Study of the Americas:

• Brianna Gilmore, Program Associate
• Emily Spangenberg, Bilingual Program Coordinator
• Hannah Gill, Associate Director of the Institute for the Study of the Americas
Definitions

**Bilingual/Multilingual**: A person who is bilingual is fluent in two languages, and a person who is multilingual is fluent in two or more languages. Someone who is bilingual or multilingual may be able to communicate in two or more languages, but they are not necessarily qualified to translate or interpret (see “Qualified Interpreter or Translator”).

**Bilingual/Multilingual Staff**: A City staff member who has a demonstrated and verified proficiency in both English and at least one other community language. Here, bilingual/multilingual staff may also refer to staff who are able to perform their job duties in two or more languages.

**Born outside of the U.S** or **Foreign-born**: The U.S. Census Bureau uses the term “foreign-born” to refer to anyone who is not a U.S. citizen at birth. This includes naturalized U.S. citizens, non-citizen U.S. nationals, lawful permanent residents (immigrants), temporary migrants (such as foreign students), humanitarian migrants (such as refugees and asylees), and unauthorized migrants.

**Born in the U.S** or **Native-born**: The U.S. Census Bureau uses the terms “native” and “native-born” to refer to anyone born in the United States, Puerto Rico, a U.S. Island Area (Guam, the Commonwealth of the Northern Mariana Islands, or the U.S. Virgin Islands), or abroad of a U.S. citizen parent or parents.

**Community Languages**: In this Plan, “community languages” refers to languages other than English that Marion residents most commonly speak at home and that have the highest proportions of individuals who rate their English proficiency as less than “very well” in U.S. Census data. “Community languages” also includes American Sign Language, based on staff reports of encountering the language on the job.

**English Language Learner (ELL)**: An alternative to “English as a Second Language (ESL)”, “ELL” is commonly used in educational settings to refer to students whose primary or preferred language(s) is not English. ELL, as opposed to ESL, also recognizes that students may speak more than one language other than English – in other words, that English is not always a “second” language.

**Immigrant**: Any person who is not a citizen or national of the United States who is present in the United States, except for those admitted specifically under non-immigrant categories. This definition includes those who entered the U.S. under an immigrant status and those that entered the U.S. without undergoing an inspection.

**In-Language Services**: Job-related services that are provided directly in languages other than English, without the use or aid of an interpreter or translator.

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9 U.S. Census Bureau, “About the Foreign-Born Population,” [https://www.census.gov/topics/population/foreign-born/about.html](https://www.census.gov/topics/population/foreign-born/about.html).

**Interpretation**: The process of adapting oral speech from one language to oral speech in another language, either simultaneously or delayed (consecutive), without loss or change in meaning. An interpreter must be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the individual who speaks a language other than English.  

**Language Access**: Providing individuals with limited English proficiency (LEP) reasonable and meaningful access to the same services as individuals who speak English. It also refers to the laws and policies that guarantee people access to written, verbal, or visual materials or services in their preferred languages.  

**Language Access Plan (LAP)**: A set of policies, procedures, and implementation steps established to provide the most effective services for individuals who prefer to communicate in a language other than English.  

**Limited English Proficiency (LEP)**: The U.S. Census Bureau’s term for individuals with limited ability to communicate (e.g. speak, read, write, or understand) effectively in English. According to the U.S. Census Bureau classification, an individual with LEP is anyone above the age of five who reported speaking English less than “very well”. The Bureau’s classifications are “very well,” “well,” “not well,” and “not at all”. The term “LEP” is deficit-focused; unless referring directly to Census data, this Plan uses “persons who speak a language other than English (LOTE)” as an alternative in most cases (see “Languages Other Than English”).  

**Languages Other Than English (LOTE)**: An alternative to “Limited English Proficiency.” The use of “LOTE” is an example of “asset-based language” that emphasizes language skills that individuals have, rather than focusing on level of proficiency in English.  

**Meaningful Access**: According to the United States Department of Justice, “language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP needing assistance” and that is not significantly delayed, restricted, or inferior to access provided to individuals who are proficient in English. The City of Marion can provide meaningful access to programs, services, and information by proactively eliminating communication barriers and ensuring that any individual can effectively communicate with the City in their preferred language.  

**Naturalized Citizen**: Naturalized citizens are foreign nationals who have become U.S. citizens after completing the requirements in the Immigration and Nationality Act.  

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12 “Frequently Asked Questions on Legal Requirements to Provide Language Access Services,” Migration Policy Institute,  
13 Haskins, 2022.  
14 United States Department of Justice, “Department of Justice Language Access Plan,”  
**Preferred Language(s):** The language(s) in which a person feels most empowered to express themselves and understand information. An individual may prefer different languages for spoken, sign, and/or written communications, depending on the nature and context of information being exchanged. For example, a person may prefer to speak in Burmese during an appointment, but read detailed written information in Thai.

**Qualified Interpreter or Translator:** “An individual who has been assessed for professional skills, demonstrates a high level of proficiency in at least two languages, and has the appropriate training and experience to interpret and/or translate with skill and accuracy while adhering to the National Code of Ethics and Standards of Practice.” This is different than a certified interpreter or translator, who has taken additional steps to meet the requirements and pass the exams of a certifying body for their specific profession (e.g. Certified Medical Interpreter, Certified Court Interpreter, or Certified Translator).

**Refugee:** A person who has been forced to cross national boundaries due to war, violence, conflict, or persecution and cannot return home safely. Formal refugee status, which allows for permanent, legal settlement in a new country and the protection of rights under the 1951 UN Refugee Convention, can be granted under certain circumstances by the United Nations.

**Safe Harbor Guideline:** Often used alongside the Four-factor Analysis, this guideline provides parameters for identifying strategic language groups in need of agency focus, particularly as they pertain to translation of vital documents. The Safe Harbor parameters are: 1) 5% or 1,000, whichever is less, of the population eligible to be served or likely to be affected or encountered, and 2) if there are fewer than 50 people in a language group that reaches the 5% trigger above, the recipient instead can provide translated written notice of the right to receive competent oral interpretation of vital documents, free of cost.

**Sight Translation:** The process of transforming a written message in the source language into a spoken message in the target language, often at the time of contact with the individual who prefers to communicate in the target language.

**Title VI of the Civil Rights Act of 1964:** This federal law protects people from discrimination based on race, color, or national origin in programs or activities that receive federal financial assistance. Under Title VI, agencies must take reasonable steps to make their programs, services, and activities accessible to individuals who prefer to communicate in a language other than English.

**Translation:** The process of adapting written text in one language to written text in another language, with consistent and accurate meanings.

**Vital Documents:** Forms and informational materials published and maintained by local governments that are critical for communication, access to resources and services, and civic

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participation. Vital documents are generally considered priority documents for translation, since they are crucial for residents’ access to activities, services, programs, and other resources the City offers. Vital documents include but are not limited to: applications; consent forms; complaint forms; intake forms, letters or notices pertaining to eligibility for benefits; letters or notices that require a response; documents that must be provided by law; and notices regarding the availability of free language assistance services for individuals who prefer to speak languages other than English. 18

Assessment

This section shares data that shaped the creation of the LAP, including demographic information about the City of Marion and an assessment of the City staff capacity to provide meaningful language access. Specifically, the assessment includes:

1) Demographic data from the U.S. Census and American Community Survey (ACS), and the McDowell County Health Department. The demographic data identifies the non-English languages spoken by Marion residents and describes language proficiency in each language group.
2) A 2023 City of Marion Language Access Capacity Survey, which the UNC BIC team distributed to all City staff.
3) Input from community partners with Latin American ancestry and/or with histories of migration in monthly BIC team meetings from May 2023-May 2024.

The Marion BIC team analyzed assessment information and data using the four-factor analysis, a framework that the Civil Rights Division of the United States Department of Justice (DOJ) recommends as a starting point to identify priority areas for providing resources and services to facilitate language access.

Four-Factor Analysis

According to DOJ guidance on language access planning, four factors can help government agencies identify priority language access services and the available resources to provide them. The four factors are:

1. Number or proportion of LEP individuals in the community
2. Frequency with which LEP individuals use City services or communicate with employees
3. Nature and importance of City services
4. Resources available and costs

The four-factor analysis helps agencies identify languages for translation and/or interpretation services and determine where resources might be needed to facilitate language access. Conclusions from the four-factor analysis can shift over time with changes in community demographics and with changes in City resources, staff capacity, and services. Therefore, it is important to regularly collect and analyze information about community demographics and City staff’s capacity to provide language services.

Factor 1: Number or proportion of LEP individuals in the community

The first factor involves identifying the languages Marion residents speak and, among these languages, which ones have higher proportions of people who say they speak English less than “very well.” This factor helps determine which languages to prioritize in securing interpretation and/or translation for the greatest number of Marion residents.

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20 While the BIC team generally prefers to note individuals’ preference for “Languages Other Than English,” we use the U.S. Census Bureau’s terminology to refer specifically to its data (“LEP”).
20% of Marion residents speak a language other than English, with Spanish being the most spoken, followed by Tagalog.\textsuperscript{21}

Countries of Origin

About 14\%, or 1,078 City residents were born outside of the United States.\textsuperscript{22} The top five countries of origin are Mexico, Philippines, Costa Rica, Canada, and Guatemala. According to the ACS, an estimated 806 residents were born in Latin America, but community expert knowledge asserts that the number of residents is likely higher.\textsuperscript{23} Mexico, Costa Rica, and Guatemala are the top Latin American places of origin, followed by El Salvador and the Dominican Republic.\textsuperscript{24} About 20% of Marion residents born abroad are naturalized U.S. citizens, the majority from Latin America\textsuperscript{25}. Around 250 Marion residents have ancestry in Asian countries. 72% of Marion's Asian residents have Filipino ancestry and 27% have Asian Indian ancestry.\textsuperscript{26}

**Table 1: Languages Spoken at Home for Marion Population 5 years and over**

<table>
<thead>
<tr>
<th>Language</th>
<th>Number</th>
<th>Percentage of total population</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Only</td>
<td>6,011</td>
<td>80.1%</td>
</tr>
<tr>
<td>Spanish</td>
<td>1,282</td>
<td>17.1%</td>
</tr>
<tr>
<td>Tagalog (Incl. Filipino)</td>
<td>180</td>
<td>2.4%</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>36</td>
<td>0.5%</td>
</tr>
</tbody>
</table>

Source: ACS 2021 (5 year estimates); Table C16001

English language proficiency

Around 53\% of residents born outside of the U.S. fall under the limited English proficiency (LEP) designation.\textsuperscript{27} Residents born outside of the U.S. who speak Spanish constitute the largest number of LEP residents with approximately 399 residents. Speakers of non-English languages demonstrate various levels of English-language proficiency. In total, around 8.2\% of Marion residents speak English less than “very well.”

8.2\% of Marion residents speak English less than “very well.”

\textsuperscript{21}2021 ACS (5 yr. estimates). Table C16001: Language Spoken At Home for the Population 5 years and Over. U.S. Census Bureau.
\textsuperscript{22} 2021 ACS (5 yr. estimates). Table SE:A06001: Nativity by Citizenship Status. U.S. Census Bureau.
\textsuperscript{23} See footnote 3
\textsuperscript{24} 2021 ACS (5 yr. estimates). Table B03001: Hispanic or Latino Origin by Specific Origin. U.S. Census Bureau.
\textsuperscript{25} 2021 ACS (5 yr. estimates). Table B05001:Nativity and Citizenship Status in the United States. U.S. Census Bureau.
\textsuperscript{26} 2021 ACS (5 yr. estimates). Table A03002: Asian by Specific Origin. U.S. Census Bureau.
\textsuperscript{27} 2021 ACS (5 yr. estimates). Table B16005: Nativity by Language Spoken At Home By Ability to Speak English for the Population 5 years and Over. U.S. Census Bureau.
Table 2: Nativity by Language and Ability to Speak English for Marion residents

<table>
<thead>
<tr>
<th>Language</th>
<th>Estimated Number of Residents Born in the U.S.</th>
<th>Estimated Number of Residents Born Outside of the U.S.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residents who speak Spanish:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td>531</td>
<td>751</td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td>476</td>
<td>352</td>
</tr>
<tr>
<td>Residents who speak other Indo-European Languages(^{28})</td>
<td>55</td>
<td>399</td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td>0</td>
<td>36</td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Residents who speak Asian and Pacific Island Languages(^{29})</td>
<td>0</td>
<td>180</td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td>0</td>
<td>180</td>
</tr>
<tr>
<td>Residents who speak Other languages</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Estimated Number of Residents with Limited English Proficiency</td>
<td>55</td>
<td>579</td>
</tr>
</tbody>
</table>

Source: ACS 2021 (5-year estimates); Table B16005

Using the Public Use Microdata for Burke and McDowell County, Table 3 below shows the top languages spoken by LEP residents are Spanish, Hmong, Tagalog, Other Central and South American languages, and Chinese.\(^{30}\) As noted below, other languages spoken in McDowell and Burke County are indigenous languages of Central and South America. Community stakeholders such as staff from Centro Unido Latino-Americano have noted Hñahñu, Purépecha, K’iche Maya, and Aguacateco as some of the indigenous languages spoken in Marion. Those languages are spoken in Mexico and Guatemala, two of the top five countries where residents were born.

Other Asian and Pacific Island languages in both counties include Chinese and Hmong which are spoken in China, Thailand, Laos, and Vietnam. About 4% of McDowell residents born outside of the U.S. are from Laos. The majority of Tagalog speakers self-rate their ability to speak English as “Well.” English is constitutionally named as one of the Philippines’ official languages, which may contribute to Tagalog-speaking residents’ proficiency in the English language. Burke County has a larger community of Hmong speakers and residents with ancestry in Thailand, Laos, and Vietnam. About 4.6% of Burke County residents born abroad are from China and Hong Kong, where Chinese is spoken.\(^{31}\)

\(^{28}\) Examples of other Indo-European languages include Gujarati, Portuguese, Polish, Hindi, and Persian
\(^{29}\) Examples of Asian and Pacific Island languages include Hmong, Urdu, Bengali, Nepali, and Burmese
\(^{30}\) 2021 ACS (5 yr. estimates). PUMA 2100 Burke and McDowell County. U.S. Census Bureau.
Table 3: Languages other than English spoken by Burke and McDowell County residents

<table>
<thead>
<tr>
<th>Language</th>
<th>Estimated number of residents who speak language</th>
<th>Estimated number of LEP residents who speak language</th>
<th>% of residents speaking language who are LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>6,687</td>
<td>2,199</td>
<td>32.8%</td>
</tr>
<tr>
<td>Hmong</td>
<td>2,105</td>
<td>729</td>
<td>34.6%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>285</td>
<td>262</td>
<td>91.9%</td>
</tr>
<tr>
<td>Other Central and South American Languages</td>
<td>262</td>
<td>262</td>
<td>100%</td>
</tr>
<tr>
<td>Chinese</td>
<td>123</td>
<td>107</td>
<td>87%</td>
</tr>
</tbody>
</table>

ACS 2021 (5 year estimates micro-data) PUMA 2100 Burke and McDowell County

Table 4: Ability to Speak English by Languages spoken by Burke and McDowell County residents

<table>
<thead>
<tr>
<th>Language Spoken</th>
<th>Speaks English “Very Well”</th>
<th>Speaks English “Well”</th>
<th>Speaks English “Not Well”</th>
<th>Speaks English “Not At All”</th>
<th>Estimated total LEP residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>4,488</td>
<td>1,484</td>
<td>674</td>
<td>41</td>
<td>2,199</td>
</tr>
<tr>
<td>Hmong</td>
<td>1,376</td>
<td>488</td>
<td>189</td>
<td>52</td>
<td>729</td>
</tr>
<tr>
<td>Tagalog</td>
<td>23</td>
<td>262</td>
<td>0</td>
<td>0</td>
<td>262</td>
</tr>
<tr>
<td>Other Central &amp; South American Languages</td>
<td>0</td>
<td>234</td>
<td>28</td>
<td>0</td>
<td>262</td>
</tr>
<tr>
<td>Chinese</td>
<td>16</td>
<td>0</td>
<td>0</td>
<td>107</td>
<td>107</td>
</tr>
</tbody>
</table>

ACS 2021 (5 year estimates micro-data) PUMA 2100 Burke and McDowell County

Given that Spanish, Hmong, and Tagalog are the languages that are most spoken and have higher proportions of individuals who report speaking English less than “very well,” these are the languages that will appear in translated notices of language services that are available to City residents at no cost. Spanish, Hmong, and Tagalog are referred to as “community languages” in the plan. The City will focus on securing translation of vital documents and in-person interpretation for Spanish and identifying language service providers who can translate and interpret between English and Hmong as well as English and Tagalog (see “Language Access Policies” and “Language Access Procedures” in this document). Interpretation and sight translation for languages listed here will also be available on request and, where possible, on demand. American Sign Language (ASL) is also included in the Plan’s definition of “community languages” due to the fact that staff reported encountering ASL on the job.
See Appendix A for more on Marion’s demographic data related to language, socioeconomic factors, and communications.

**Factor 2: Frequency with which LEP individuals interact with City programs & services**

The second factor identifies the community languages that City of Marion staff most frequently encounter on the job. This factor, combined with demographic data on community languages other than English, helps determine not only which languages to prioritize for translations, but also the types of language services to prioritize, which City departments have greater needs for language services, and how to focus staff resources and training on language access. The BIC team distributed a Departmental Language Access Survey to City employees in 2023 to better understand their language access resources and needs. 100% of departments and a total of 66 employees responded to the survey.

According to the 2023 survey, Spanish is the most frequently encountered language among City of Marion staff. Staff also encounter Chinese, French, Hmong, and American Sign Language, though less frequently.

Staff that report encountering Spanish “very frequently” or “frequently” are in the following departments:

- Accounting
- Fire
- Planning and Development
- Police
- Public Works - Sanitation
- Water & Wastewater Treatment

Other departments whose staff reported encountering Spanish less frequently include:

- Administration (City Clerk)
- Public Works – Streets

Departments whose staff report encountering Chinese, French, Hmong, and/or American Sign Language noted that they encounter these languages either “not frequently” or “almost never.” These departments include:

- Fire
- Police
- Utility Maintenance

Of the departments that report encountering languages other than English, staff in the Police and Fire departments report encountering the widest variety of languages. Departments across the City noted a reliance on emergency personnel in the Police and Fire departments for interpretation and/or translation when needed, though the City hired a bilingual customer service representative outside of the Police and Fire departments after the survey was completed. Some respondents
noted an interest in taking Spanish or ASL classes to better serve community members in their interactions and communications.

Departments across the City did not report using a standardized data method to identify and track languages staff encounter on the job. As a result, respondents’ answers may not reflect the actual frequency with which they encounter certain languages, but staff consistently report encountering Spanish often across several departments.

See Appendices C & D for more details on the City of Marion’s Departmental Language Access Survey and its results.

Factor 3: Nature and Importance of City Services
The third factor helps identify which programs, activities, or services most benefit residents or have the greatest impact on their quality of life. The City of Marion provides many important services, including emergency response, connections to vital resources, community outreach and engagement, permitting and zoning, recreational opportunities, and management of public utilities and infrastructure. The City is committed to providing language access across programs that facilitate public health and safety, and to providing meaningful access to services and participation in civic life, including translation of vital documents and interpretation and/or in-language services at meetings, community engagement events, and at City facilities.

Factor 4: Resources Available and Costs
The Police Department and Fire Department note having access to contract telephonic and video remote interpretation services through LanguageLine and can rely on additional help through McDowell County’s EMS. These departments also have staff who speak Spanish and use their Spanish language skills on the job, and the Police Department has an officer who speaks Hmong.

The City and CULA are eligible for implementation funding from Building Integrated Communities at UNC-Chapel Hill after adoption of the Language Access Plan in 2024 to support the City’s language access implementation goals over the next year.

Four-Factor Analysis: Conclusions
The BIC team has identified its community languages as Spanish, Hmong, American Sign Language, and Tagalog. These are the most spoken languages other than English in Marion, the proportion of residents who rate their ability to speak English as less than “very well,” and how frequently staff encounter languages other than English. The City will provide notices of available free language services for these four languages and identify professional language services providers who can translate and/or interpret between these languages and English. The City will translate vital documents into Spanish and take reasonable steps to accommodate requests for interpretation and translation in other identified community languages.

Community Priorities
During monthly Marion BIC meetings, the team discussed community priorities and best practices for engaging community members who prefer to speak languages other than English and immigrant and refugee community members, along with general best practices for providing language access.
The following list synthesizes top priorities and language access recommendations that Centro Unido Latino-Americano leaders shared:

- Inclusion of all community members is essential to building trust with the local government, and language access is a major component of both. CULA shared the importance of community support of and attendance at its events and programming, as well as providing more opportunities for community members to engage with local government.
- Communicating with residents in their preferred languages and using the platforms they are already using (such as Facebook and WhatsApp) can be both an effective way of engaging them and in building trust.
- In-person interactions and in-language services are highly valued and builds trust and relationships, and they take into account differences in literacy levels. CULA mentioned that increasing diversity among City staff to reflect the community’s demographics, particularly to include more bilingual staff, is important in building trust and comfort with interacting with local government.
- Increasing the number of translated written communications and documents would benefit the community, particularly content on the City’s website, emergency communications, and other vital documents and information.
- Along with language access, civic education is also important in increasing engagement with residents who prefer to speak languages other than English and/or who have histories of migration. For example, a guide to the City’s internal and services that the City provides could increase engagement with local government.
- Knowledge of community beyond Census data is key to building relationships and facilitating effective communication. CULA has pointed to the fact that Census data undercounts numbers of community members with histories of migration and/or who prefer to speak languages other than English. Trainings on the cultures and histories of residents’ countries of origin are important to understanding the diversity of the community.
Language Access Policies

Language Access Policies establish the City’s commitment to language access and how the City provides meaningful access to services, programs, and information for residents who prefer to communicate in a language other than English, including American Sign Language (ASL). These policies follow guidance outlined in the U.S. Department of Justice’s Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs and the Migration Policy Institute’s A Framework for Language Access.

General Statement of Policy

It is the policy of the City of Marion to ensure that no person shall, on the ground of race, color, national origin, limited English proficiency, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of its programs and activities, as provided by Title VI of the Civil Rights Act of 1964, Executive Order 13166, the Civil Rights Restoration Act of 1987, and other pertinent nondiscrimination authorities. The City of Marion will provide timely meaningful access to all City programs, resources, and services for any individuals who prefer to speak a language other than English, including ASL. Staff will inform community members of their right to free language services and secure these services to the best of their ability.

Policies for Notice of Availability of Language Assistance Services

1. The City will notify all residents of their right to interpretation and translation at no charge.
2. Notifications will be provided in identified community languages, including ASL.
3. Notifications will specify that City staff will arrange to provide appropriate language services on demand or upon request.
4. Notifications will provide basic information about available language services and how to request them.
5. Notifications will be posted in a variety of locations, which will include:
   - On the City’s Website
   - On flyers, newsletters, and other printed materials the City distributes to the community
   - Via local media and social media platforms
   - In community partners’ communications

Policies for Translation and Interpretation

6. The City will offer translation and interpretation services free of charge.
7. The City will translate vital documents and information, including emergency communications, into the City’s identified community languages.
8. The City will make its best effort to ensure timely access to interpretation and translation services.
9. The City commits to using competent, trained, and culturally sensitive translators and interpreters, including the use of qualified multilingual employees.
10. Interpretation may be requested for public meetings, small group meetings, or one-on-one interactions. Requests should be submitted as far in advance as possible to allow adequate time to arrange in-person interpretation services.

11. On-demand interpretation via qualified and approved multilingual staff, telephonic, or video will be available for phone calls, walk-in interactions, or other situations in which advance notice is not possible.

Policies for Staff Training, Multilingual Employees, & Other Staff Support

12. All employees will receive training on the City’s Language Access Plan.

13. City staff will complete training in best practices and ethical considerations related to language access. Training may include, but is not limited to:
   - Not using minors or residents’ friends/family as interpreters or translators;
   - Determining which language assistance services to request (simultaneous vs. consecutive interpretation, available language service providers, etc.);
   - Parameters around language service requests to multilingual colleagues including procedures for requesting assistance from multilingual staff, and subject matter considerations (for example, requests that are legal or medical in nature will be sent to one of the City’s contracted language service providers);
   - General overview of Language Access Plan; and
   - Skills on how to properly identify an individual’s preferred language.

14. Multilingual staff who voluntarily provide in-language services and translation and/or interpretation skills will be assessed for language proficiency as well as interpretation and/or translation skills before providing services.

15. Multilingual staff who voluntarily provide in-language services and for translation and/or interpretation skills will be trained on expectations for providing in-language services, translation, and/or interpretation, including when and how to determine whether a request for assistance is most appropriate to provide in-house or to send to an external service provider.
   - If a request requires legal, medical, or other specialized expertise for sensitive matters, it will be contracted out to an external service provider.
   - Multilingual employees’ immediate supervisors and department heads will also consider impact to the department if employees regularly provide interpretation and/or translation.

16. Qualified multilingual staff who provide language services can participate in professional development opportunities and trainings to support their provision of in-language services, translation, and/or interpretation.

Policies for Language Access Services Assessment & Evaluation of Plan

17. The Title VI Coordinator will work with the City’s Language Access Committee to review the Language Access Plan every two years to assess its effectiveness for community members and for staff members.

18. The Title VI Coordinator will review demographic data and seek community input to determine whether the Language Access Plan provides meaningful access to City
programs, services, resources, and information. Some examples of gathering input include surveys, focus groups, and/or meetings with community-based organizations.

19. The City will conduct an annual internal language access survey to evaluate staff language services capacity.
   - The survey will identify the use of existing language access services, staff needs for language access support, multilingual staff’s use of language skills, and other pertinent information.

Policies for Language Access Reporting, Monitoring, and Compliance

20. The City will prepare a compliance report every two years documenting language services provided each fiscal year. This report may include:
   - Reporting on the City’s language assistance services, including the usage of language services and tracking of language assistance requests; and
   - Feedback from residents who are LEP and speakers of languages other than English, including community-based organizations and groups, regarding effectiveness of the LAP and language services provided by the City.

21. The City will notify individuals who prefer to speak languages other than English of their right to make a complaint of discrimination based on LEP status or a failure to adequately provide services. Notifications will be available in top community languages.

22. The City will collect and respond to all language access complaints, and all correspondence on submitted complaints will be in complainants’ preferred languages. The preferred method for filing a complaint will be a Title VI complaint form on the City’s website, but paper/written forms may also be provided.
Language Access Procedures

This section outlines key procedures that the City of Marion will adopt to carry out the policies described in the previous section. The City will regularly review and refine the procedures described below and develop new procedures as needed to better serve community members who prefer to speak languages other than English and to support staff in providing language services.

Determining the Need for Language Assistance

- City staff will not solely rely on their own assessment of community members’ preferred language(s) in determining the need for interpretation or translation. The following are examples of how staff may determine community members’ preferred language:
  - Community members’ self-identification or notification of preferred language;
  - “I Speak” or interpretation request cards;
  - Assistance from a telephonic interpretation service (such as LanguageLine); and
  - Assistance from a qualified bilingual staff member.

- Every two years, under the direction and guidance of the Title VI Coordinator, the City of Marion Language Access Plan committee will review demographic data, solicit data from employees who interact with the public, and conduct conversations with community members who speak languages other than English to identify language assistance needs within the City of Marion.

Notice of Availability of Language Assistance Services

- City staff will provide notices in a variety of ways, including, but not limited to:
  - Verbally in interactions and communication with community members;
  - Flyers, posters, or information sheets in appropriate City reception areas and other points of entry in facilities;
  - The City website and social media platforms;
  - Attachment to vital City documents and select broadly distributed brochures and pamphlets; and
  - Through community organizations and other stakeholders, who will inform Marion residents of their right to language access services free of charge.

- Notices will be provided in Spanish, Hmong, and Tagalog.

Requesting Translation and/or Interpretation Services

- The City will identify and contract with professional language service providers for on-demand translation and/or interpretation services via phone or video.

- Residents can request translation and/or interpretation services by calling a phone number or sending an email to an account that the City will designate for receiving language assistance requests. Requests can be made in residents’ preferred language.
  - Requests should be made as far in advance as possible to allow adequate time to arrange in-person interpretation services.

- Residents without access to a computer and/or internet can make requests in their preferred languages in person at the Water Utility Billing window at the City Hall Annex, 194
N. Main Street. City staff will submit the request via form or email to an account that the City designates for language services requests on their behalf. The City will make a reasonable attempt to accommodate the request.

Vital Documents and Information

- The Title VI Coordinator will develop and maintain a list of vital documents produced by the City of Marion and will distribute that list to each department. Under the guidance of the Title VI Coordinator, departments will seek to make vital documents available in Spanish and other community languages identified through the community needs assessment completed every two years.
- Staff can request a document to be translated by submitting the request to their Department Head. The Department Head will share with the Title VI Coordinator. Based on importance, time-sensitivity and length of document, the Title VI Coordinator will send the document to be translated.
- Emergency communications will be translated into community languages and disseminated via channels accessible to the community.

Staff Training & Orientation on the City’s Language Access Plan

- Human Resources will include basic information about the City’s LAP during new hire orientations.
- New hires will receive training on the LAP within the first six months of employment, and annual staff trainings will be held to ensure that employees are kept current on any changes to the plan.
- Employees who regularly interact with the public will be trained on the use of “I Speak” cards.
- Employees will be trained on when it is appropriate to make language requests of multilingual staff and when it is more appropriate to make requests from a contract language service provider.

Multilingual Staff Who Provide Language Services

- Multilingual City of Marion employees who would like to voluntarily offer translation and/or interpretation services to the City are eligible to take a proficiency examination coordinated by the Human Resources Department to establish their level of proficiency in languages other than English, including American Sign Language, as well as their skills in translation and interpretation.
- Once the level of proficiency has been established, Human Resources will provide the employee with a written proficiency level designation and advise the employee’s immediate supervisor and Department Head of the designation level. Employees with then work with their department directors and supervisors to complete a form that defines the scope of the services the employee may offer, taking into account the departmental impact should the employee regularly provide these services.
employees may at any time withdraw their offer to provide Language Services by notifying Human Resources in writing. Human Resources will then notify the employee’s immediate supervisor and Department Head.

Monitoring and Updating Plan

- Under the direction and guidance of the City’s Title VI Coordinator, the LAP committee will monitor and update the plan at least once every two years in conjunction with the needs assessment schedule.
  - Data used to monitor and update the plan may include, but is not limited to:
    - Input from leaders and organizations who work with community members who prefer to speak languages other than English;
    - Data on community demographics, including languages spoken; and
    - Input from staff on language access capacity
Language Access Implementation Plan

The Language Access Implementation Plan outlines steps the City will take over the next year to implement the Policies and Procedures outlined above. After considering the elements of the four-factor analysis described in the Assessment section of this document, and after weighing community priorities and current City resources for language access, the implementation plan works toward the following goals:

- **Goal #1:** Create a Language Access Committee (LAC) with representatives from each City facility. The Committee members will be responsible for putting language access structures in place in their respective areas, including the subsequent goals listed here, and working with the Title VI Coordinator to monitor and evaluate the City’s Language Access Plan. Committee members will be responsible for:
  - Communicating about the City’s LAP with staff in their respective facilities.
  - Gathering information on language access needs and language service use from departments housed in their respective facilities.
  - Setting timelines for language access projects pertinent to their facilities.
  - Conducting and writing annual reviews of the City’s LAP with the Title VI Coordinator and members of the Marion BIC team.
  - Working with the Title VI Coordinator and with representatives of Centro Unido Latino-Americano and other community-based organizations to facilitate staff and community feedback on the City’s language access goals.
  - Developing a five-year plan for Language Access Plan implementation, in conjunction with the Marion BIC team.
  - Identifying vital documents to translate into Spanish, in coordination with the Title VI Coordinator and Department Heads.

- **Goal #2:** Create a community outreach plan for the Language Access Plan (LAP), including content and messaging to be distributed on virtual platforms and at City events.
  - Create a page on the City’s website for the LAP, to include branding and an explanation of the City’s vision for the LAP. Page will be available in English and Spanish, written in plain language and including visuals.
  - Create bilingual posters, flyers, and other media with information on free language services the City provides for distribution at events and in-person meetings.
  - Work with CULA and other community partners to disseminate information about the new LAP and language services available to community members. Messaging about the LAP will be in English and Spanish and will be disseminated via platforms and media that community members use.
  - Develop a language access complaint form to be posted on the City’s LAP page.

- **Goal #3:** Select a variety of qualified language service providers for the City’s translation, interpretation, and staff language assessment needs in community languages.
  - Identify language service providers with whom the City may contract for translation of documents and/or interpretation at meetings and events.
Contract with a language service provider to develop and deliver the assessment tool to evaluate multilingual staff members’ proficiency in languages other than English.

- **Goal #4: Develop preliminary guides, procedures, and training materials to support staff’s facilitation and provision of language services.** This may include:
  - A list of contract language services providers, with information on how to use them (when to book via LAC, how to access interpretation on demand, etc.).
  - “I Speak” cards that community members can use to identify their preferred languages.
  - Development of procedures for multilingual staff to use their assessed skills on the job (in-language services, interpretation, and/or translation).
  - A database or quick-reference guide for City employees to use that includes information on how to request language services, to include interpretation at meetings at events, translation of documents, and/or how to access language services on demand (for example, in a phone call).
  - A list of qualified multilingual staff members who are able to provide in-language services, interpret, and/or translate, with information on how to request their assistance.
  - Staff training and professional development opportunities related to language access.
  - A plan for Spanish and cultural awareness trainings via CULA.
Appendices

- A: Full Marion Demographic Report
- B: List of Collaborators
- C: Staff Survey Questionnaire
- D: Complete City of Marion Staff Language Access Capacity Survey Results
Appendix A: The City of Marion and McDowell County Demographics

The City of Marion and McDowell County are home to diverse communities with ancestry in many parts of the world. The Building Integrated Communities team compiled available data from the American Community Survey (ACS), the U.S. Census and McDowell County’s local organizations and schools to better understand community demographics. Due to the COVID-19 pandemic and community hesitations to fill out the Census, the data presented are estimates. Local community-based organizations further support findings that the 2020 U.S. Census significantly undercounted many community members, particularly those of Latin American ancestry.  

**Population:** The City of Marion’s total population is 7,703. More than 14% of City residents were born outside of the United States.

**Country of Origin:** Mexico is the top country of origin for residents born abroad, followed by the Philippines, Costa Rica, Canada, Guatemala, and India.

**Latin America** is an important region of origin for many Marion residents. According to the ACS, an estimated 806 residents were born in Latin America, but based on community expert knowledge the number of residents is likely higher. Mexico, Costa Rica, and Guatemala are the top Latin American places of origin, followed by El Salvador and the Dominican Republic. About 20% of Marion residents born abroad are naturalized U.S. citizens, the majority from Latin America.

**Asia** is another important region for around 250 Marion residents. 72% of Marion’s Asian residents have Filipino ancestry and 27% have Asian Indian ancestry.

<table>
<thead>
<tr>
<th>Race &amp; Ethnicity in Marion</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
</tr>
<tr>
<td>Black</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
</tr>
<tr>
<td>Asian</td>
</tr>
<tr>
<td>Some Other Race</td>
</tr>
</tbody>
</table>

**Table 1: Country of Origin for Marion residents born abroad**

<table>
<thead>
<tr>
<th>Country of Origin</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mexico</td>
<td>61%</td>
</tr>
<tr>
<td>Philippines</td>
<td>16.7%</td>
</tr>
<tr>
<td>Costa Rica</td>
<td>4.9%</td>
</tr>
<tr>
<td>Canada</td>
<td>3.8%</td>
</tr>
<tr>
<td>Guatemala</td>
<td>3.4%</td>
</tr>
<tr>
<td>India</td>
<td>3.3%</td>
</tr>
</tbody>
</table>

Source: ACS 2021 (5 yr. estimates); Table B05002

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33 2021 ACS (5 yr. estimates). Table B01003: Total Population. U.S. Census Bureau.
34 2021 ACS (5 yr. estimates). Table B05002: Place of Birth by Nativity and Citizenship Status. U.S. Census Bureau.
35 See footnote 3
36 2021 ACS (5 yr. estimates). Table B03001: Hispanic or Latino Origin by Specific Origin. U.S. Census Bureau.
**Linguistic Diversity**

Marion is a diverse linguistic community. 20% of Marion residents speak a language other than English. 17.1% of City residents speak Spanish, making it the most commonly-spoken language other than English. Among the countries listed in Table 1, Mexico, Costa Rica, and Guatemala, are predominantly Spanish speaking. Other languages in these countries and Marion communities include Purepecha, Hñahñu, K’iche Maya, and Aguacateco. 2nd and 3rd generation immigrants from Latin American families may also speak Spanish in their household. The most spoken language other than English and Spanish is Tagalog, also known as Filipino. Around 2.5% of Marion residents speak Tagalog.

<table>
<thead>
<tr>
<th>Table 2: Languages Spoken at Home for Marion Population 5 years and over</th>
</tr>
</thead>
<tbody>
<tr>
<td>Language Spoken</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>English Only</td>
</tr>
<tr>
<td>Spanish</td>
</tr>
<tr>
<td>Other Indo-Europeans Languages</td>
</tr>
<tr>
<td>Tagalog (Incl. Filipino)</td>
</tr>
</tbody>
</table>

Source: ACS 2021 (5 yr. estimates); Table C16001

**Ability to Speak English**

Speakers of non-English languages demonstrate various levels of English language proficiency. The ACS helps identify the languages spoken in various geographic locations and the ability of respondents to speak English on a scale of “not at all” to “very well”. An individual who does not speak English as their primary language and who rates their ability to speak English as “well,” “not well” or “not at all” are designated as Limited English Proficient (LEP).

8.2% of Marion residents speak English less than “very well.”

Table 3 shows the self-rated English-speaking ability of residents who speak a language other than English for City of Marion residents. It’s important to note that limited English proficiency is not

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39 2021 ACS (5 yr. estimates). Table C16001: Language Spoken at Home for the Population 5 years and over. U.S. Census Bureau.
solely a characteristic of people who were born outside of the United States; there are residents born in the U.S. who are considered LEP. Around 60% of residents born outside of the U.S. fall under the limited English proficiency (LEP) designation. Residents born outside of the U.S. who speak Spanish constitute the largest number of LEP residents with approximately 399 residents.

Table 3: Nativity by Language and Ability to Speak English

<table>
<thead>
<tr>
<th>Language</th>
<th>Estimated No. of Residents Born in the U.S.</th>
<th>Estimated No. of Residents Born Outside of the U.S.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residents who speak Spanish:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td>531</td>
<td>751</td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td>476</td>
<td>352</td>
</tr>
<tr>
<td>Residents who speak other Indo-European Languages41</td>
<td>0</td>
<td>36</td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residents who speak Asian and Pacific Island Languages42</td>
<td>0</td>
<td>180</td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residents who speak Other languages</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks English Less Than “Very Well”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Estimated No. of Residents with Limited English Proficiency</td>
<td>55</td>
<td>579</td>
</tr>
</tbody>
</table>

Source: ACS 2021 (5 yr. estimates); Table B16005

Using the Public Use Microdata for Burke and McDowell County, Table 4 shows the top languages spoken by LEP residents are Spanish, Hmong, Tagalog, Other Central and South American languages, and Chinese. As noted below, other languages spoken in McDowell and Burke County are indigenous languages of Central and South America. Community stakeholders such as staff from El Centro Unido Latino-Americano have noted Hñahñu, Purépecha, K’iche Maya, and Aguacateco as some of the indigenous languages spoken in Marion. Those languages are spoken in Mexico and Guatemala, two of the top five countries where residents were born. Tagalog is spoken in the Philippines. The majority of Tagalog speakers self-rate their ability to speak English as “Well”. English is constitutionally named as one of the Philippines’ official languages, which may contribute to Tagalog-speaking residents’ proficiency in the English language.

Table 4: Languages other than English spoken by Burke and McDowell County residents

40 2021 ACS (5 yr. estimates). Table B16005: Nativity by Language Spoken At Home By Ability to Speak English for the Population 5 years and Over. U.S. Census Bureau.
41 Examples of other Indo-European languages include Gujarati, Portuguese, Polish, Hindi, and Persian.
42 Examples of Asian and Pacific Island languages include Hmong, Urdu, Bengali, Nepali, and Burmese.
43 2021 ACS (5 yr. estimates). PUMA 2100 Burke and McDowell County. U.S. Census Bureau.
Other Asian and Pacific Island languages in both counties include Chinese and Hmong which are spoken in China, Thailand, Laos, and Vietnam. About 4% of McDowell residents born outside of the U.S. are from Laos. Burke County has a larger community of Hmong speakers and residents with ancestry in Thailand, Laos, and Vietnam. About 4.6% of Burke County residents born abroad are from China and Hong Kong, where Chinese is spoken.\textsuperscript{44}

<table>
<thead>
<tr>
<th>Language</th>
<th>Estimated number of residents who speak language</th>
<th>Estimated number of LEP residents</th>
<th>% of residents speaking language who are LEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>6,687</td>
<td>2,199</td>
<td>32.8%</td>
</tr>
<tr>
<td>Hmong</td>
<td>2,105</td>
<td>729</td>
<td>34.6%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>285</td>
<td>262</td>
<td>91.9%</td>
</tr>
<tr>
<td>Other Central and South American Languages</td>
<td>262</td>
<td>262</td>
<td>100%</td>
</tr>
<tr>
<td>Chinese</td>
<td>123</td>
<td>107</td>
<td>87%</td>
</tr>
</tbody>
</table>

ACS 2021 (5 year estimates micro-data) PUMA 2100 Burke and McDowell County

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\textsuperscript{44} 2021 ACS (5 yr. estimates). Table A07001. Place of Birth for Foreign-Born Population. U.S. Census Bureau.
Education:

The highest level of education many Marion residents attain is a high school diploma or an equivalent form at 30.4% of the population.\textsuperscript{46} About 12% of residents have a bachelor’s degree. Workers in the labor force who prefer to speak Spanish have a high school diploma or equivalent, while most English-only speakers in the labor force have some college or an associate degree.\textsuperscript{46} Most Marion residents who speak Asian and Pacific Island languages, including Tagalog, have a bachelor’s or other higher educational degree.

Each year the Department of Public Instruction prepares a headcount of all English Language Learners (ELL) by school districts. According to the English Language Learner headcount of the 2022-2023 school year\textsuperscript{47}, McDowell County Schools enrolled 383 ELL students, a decrease from 392 ELL students in the 2019-2020 school year.\textsuperscript{48} English Language Learners have the lowest graduation rate in the McDowell County Schools, with 52%\textsuperscript{49} of ELLs graduating within 4 years, compared to the North Carolina average of 69% of ELLs graduating within 4 years.\textsuperscript{50} Data on languages spoken at home for students in the McDowell County school system were not readily available.

\textsuperscript{46} 2021 ACS (5 yr. estimates). Table B15003: Educational Attainment for the Population 25 years and Over. U.S. Census Bureau.
\textsuperscript{47} 2021 ACS (5 yr. estimates). Table B16010: Educational Attainment and Employment Status by Language Spoken At Home For Population 25 years and over. U.S. Census Bureau.
\textsuperscript{48} NC Department of Public Instruction Report to the North Carolina General Assembly. Headcount of English Language Learners (December 1\textsuperscript{st}, 2022)
\textsuperscript{49} NC Department of Public Instruction Report to the North Carolina General Assembly. Headcount of English Language Learners (December 1\textsuperscript{st}, 2020)
\textsuperscript{50} North Carolina Report Card Online Database, LEA 590, 2021-2022 reporting year https://ncreports.ondemand.sas.com/src/
**Technology**

Access to technology is critical for residents. High poverty rates and lack of infrastructure in the City of Marion and McDowell County can contribute to a reported lack of broadband internet and devices. Federal programs like the Affordable Connectivity Program (ACP) can provide families with low-cost internet and devices. As of May 2023, McDowell County (zip code 28752 specifically) had 2,834 households enrolled in the ACP, approximately 19.8% of all households in the zip code area. There is a higher percentage of adults over 65 in the area than younger residents. Older adults often have lower levels of digital literacy due to barriers around access, installation, knowledge, and trust, which contributes to digital inequality in McDowell County.51

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>No Internet Subscription</th>
<th>No Computer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black</td>
<td>0.0%</td>
<td>9.8%</td>
</tr>
<tr>
<td>American Indian</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>Some Other Race</td>
<td>4.0%</td>
<td></td>
</tr>
<tr>
<td>Two or More Races</td>
<td>6.5%</td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>10.4%</td>
<td></td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>18.0%</td>
<td></td>
</tr>
</tbody>
</table>

During the COVID-19 pandemic, McDowell County Schools partnered with local organizations to create Wi-Fi hotspots across the County to provide supplemental access to residents.52 The McDowell County Senior Center located in Marion provides 6 computers connected to the internet.53 Local libraries (McDowell County Public Library, Marion Library, and Old Fort Library) can lend hot-spot devices to residents. Local organization Centro Unido LatinoAmericano provides private spaces for residents to participate in telehealth visits by using its internet and private space.

52 See footnote 18
53 See footnote 18
Health Insurance

Access to health insurance serves as a true indicator of quality of life. Access to health insurance affects both residents born in the United States and those born abroad. However, a larger percentage of residents who were born outside of the United States do not have health insurance. Of the 1,806 foreign born residents in McDowell County, 50.6% do not have health insurance. By contrast, 10.9% of U.S. born residents in McDowell County lack health insurance. In Marion, 39.1% of residents born outside of the U.S. do not have health insurance whereas only 13.7% of U.S. born residents in Marion don’t have health insurance. Overall, residents born outside of the U.S. are more likely to not have health insurance compared to residents born in the U.S.

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>No Health Insurance</th>
<th>With Health Insurance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black</td>
<td>12%</td>
<td>88%</td>
</tr>
<tr>
<td>American Indian</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>0%</td>
<td>100%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>24%</td>
<td>76%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>13%</td>
<td>87%</td>
</tr>
<tr>
<td>White Alone</td>
<td>38%</td>
<td>62%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>50%</td>
<td>50%</td>
</tr>
</tbody>
</table>

17.7% of Marion residents do not have health insurance.

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55 See footnote 23.
References

2021 American Community Survey (5-Year Estimates) 2017-2021. Table A03002: Asian by Specific Origin; Table A07001: Place of Birth for Foreign-Born Population; Table B01003: Total Population; Table B03001: Hispanic or Latino Origin by Specific Origin; Table B03002: Hispanic or Latino Origin; Table B05001: Nativity and Citizenship Status in the United States; Table B05002: Place of Birth By Nativity and Citizenship Status; Table B15003: Educational Attainment for the Population 25 years and Over; Table B16005: Nativity by Language Spoken At Home By Ability to Speak English for the Population 5 years and Over; Table B16010: Educational Attainment and Employment Status by Language Spoken At Home For Population 25 years and over; Table B27020: Health Insurance Coverage Status and Type by Citizenship Status; Table B28009: Presence of a Computer and Type of Internet Subscription in Household; Table C16001: Language Spoken at Home for the Population 5 years and older. Generated by Brianna Gilmore using Social Explorer. U.S. Census Bureau.


Marion’s Global Communities

14% of Marion residents were born outside of the United States. The majority are from Mexico followed by the Philippines, Costa Rica, Canada, and Guatemala.

Marion has a diverse Latin American heritage. 14% of Latinos have ancestry from Mexico. Other important places include Puerto Rico, the Dominican Republic, Costa Rica, and El Salvador.

The majority of naturalized U.S. citizens are from Latin America. 72% of Asian residents have Filipino ancestry.

## Languages Spoken in the City of Marion

<table>
<thead>
<tr>
<th>Language</th>
<th>Percentage of City of Marion residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Only</td>
<td>80%</td>
</tr>
<tr>
<td>Spanish</td>
<td>17.1%</td>
</tr>
<tr>
<td>Speak English “Very Well”</td>
<td>11%</td>
</tr>
<tr>
<td>Speak English Less Than “Very Well”</td>
<td>6.1%</td>
</tr>
<tr>
<td>Tagalog (incl. Filipino)</td>
<td>2.4%</td>
</tr>
<tr>
<td>Speak English “Very Well”</td>
<td>0%</td>
</tr>
<tr>
<td>Speak English Less Than “Very Well”</td>
<td>2.4%</td>
</tr>
</tbody>
</table>

The ability to speak English is determined by individuals choosing one of four choices: “very well”, “well”, “not well”, and “not at all”, as stated on the U.S. Census Bureau’s American Community Survey.

## LANGUAGES OTHER THAN ENGLISH

20% of Marion residents speak a language other than English.

10% of residents not born in the U.S. speak Spanish and 7.1% of residents born in the U.S. speak Spanish.

Tagalog is spoken in the Philippines. The majority of Tagalog speakers self-rate their ability to speak English as “Well”. English is constitutionally named as one of the Philippines’ official languages.

Other languages spoken in McDowell and Burke Counties are Hñähñu, Purepecha, and Agüecateco (indigenous languages spoken in Mexico and Guatemala).

Other Asian and Pacific Island languages in both counties include Chinese and Hmong (which is spoken in Thailand, Laos, and Vietnam).

Burke County has a larger community of Hmong speakers and residents with ancestry in Thailand, Laos, and Vietnam than McDowell County.
Appendix B: Marion’s Building Integrated Communities Collaborators

Marion’s Building Integrated Communities (BIC) team consisted of representatives from the City of Marion, Centro Unido Latino-Americano, and UNC-Chapel Hill’s Institute for the Study of the Americas:

City of Marion:

- Beth Lytle, Administrative Specialist, Public Works
- Brian Bartlett, Building Inspector/Code Enforcement Officer, Planning and Development
- DJ Barrier, Support Services Lieutenant/Training Coordinator, Marion Police Department
- Heather Cotton, Director, Planning and Development
- Kathleen Nolan, Director, Human Resources
- Landdis Hollifield, former City Clerk/Public Information Officer
- Ray McDaniel, Fire Chief, Marion Fire Department
- Sarah Dhunjishaw, Lead for North Carolina Fellow
- Vance McNees, City Planner II, Planning and Development
- Vanessa Rangel, Customer Service Representative, Utility Collections

Centro Unido Latino-Americano:

- Carlos Lopez, Youth Engagement Coordinator
- Laura Galindo, Program Director
- Laura Zapater, Associate Director
- Margarita Ramirez, Executive Director

University of North Carolina-Chapel Hill, Institute for the Study of the Americas:

- Brianna Gilmore, Program Associate
- Emily Spangenberg, Bilingual Program Coordinator
- Hannah Gill, Associate Director of the Institute for the Study of the Americas

Special thanks to the following people who provided valuable insights on community languages, helped define implementation goals for the City of Marion’s Language Access Plan, or shared expertise on engagement with community members who prefer to speak languages other than English.

- Bambi Watkins, NC Works McDowell
- Bob Boyette, City of Marion Manager
- Darwin Roos, NC Works McDowell
- Paula Swepson-Avery, Executive Director, West Marion Community Forum
- Sofia Godoy, UNC-Chapel Hill
Appendix C: City of Marion Staff Survey Questionnaire

The City of Marion has begun a partnership with the Building Integrated Communities (BIC) Initiative at the Institute for the Study of the Americas at UNC-Chapel Hill. Over the next two years, a team of UNC BIC staff, representatives from the City of Marion, and the Centro Unido Latino-Americano will write and implement a language access plan.

Marion’s BIC team requests your help gathering information about how your department communicates with residents who speak languages other than English. The information you’re able to provide about your experience will help the Marion BIC team draft a language access plan to make City communications and interactions accessible to Marion residents in their preferred languages. We would appreciate if you could fill out this survey by Friday, July 7. Your responses will be kept confidential, and we will not report your name, contact information, or title in published materials. We thank you in advance for participating. For questions, please contact Emily Spangenberg, Bilingual Program Coordinator for BIC at UNC: espangen@email.unc.edu or 919-962-2414.

*Underlined and bold-font questions* were sent to department directors only

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Section 1: Multilingual Employees and Staff Policies

- Do you speak any languages other than English?
- Do you use a language other than English as part of your job duties?
- Were you hired for bilingual or multilingual skills as part of your job description?
- How often do you use a language other than English as part of your job?
- Has your department assessed your proficiency in any language other than English?
- Describe how your department has assessed your skills or proficiency in any language other than English.
- Do you receive a stipend or an incentive for using a language other than English as part of your job duties?
- Describe the stipend or incentive.
- How did you first start to receive the stipend or incentive?
- Have you completed any training or certification programs to translate or interpret between English and any other language?
- **Do you have staff in your department who speak languages other than English?**
- **To the best of your knowledge, how many staff members speak languages other than English, and which languages?**
- **Do any of the staff in your department use a language other than English as part of their job duties?**
- **How many staff members, and which languages?**
- **Were they hired with bilingual or multilingual skills as part of their job description?**
- **How often do they use this language (or languages) as part of their job?**
- **Does your department have a procedure to assess their proficiency in languages other than English?**
• Describe the procedure or assessment used to determine staff proficiency in languages other than English.
• Does your department offer a stipend or incentive to employees who are fluent in a language other than English and who use that language as part of their job?
• Describe how an employee begins to receive the stipend or incentive.
• Does your department provide staff training on how to interact with or assist community members who speak languages other than English?
• Please briefly describe the training.

Section 2: Interactions with the Public & Customers Who Speak Languages Other Than English

• What non-English languages do you most frequently encounter in your interactions with community members as part of your job, and how often do you encounter them?
• To your knowledge, what non-English languages do staff most encounter in your department, and how often do staff encounter them?
• Does your department have a method or procedure to determine your clients’ or customers’ preferred languages?
• How do you determine your clients’ or customers’ preferred languages?
• Does your department use a data collection method to record or track the preferred languages of your clients or customers?
• Please describe the data collection method you use.

Section 3: Language Assistance Services and Policies

• Does your department currently offer communications in languages other than English? (Newsletter, signage, flyers, videos, etc.) If yes, please list them to the best of your knowledge, along with the languages that are available.
• Does your department currently provide translated written forms, applications, or other documents necessary to access Town services?
• Does your department provide any of the following when staff interact with community members who speak languages other than English? Select all that apply.
  o Over-the-phone (telephonic) interpreter
  o Video interpreter
  o Staff member(s) trained as an interpreter
  o Staff member(s) trained as a translator
  o Bilingual or multilingual staff members (not trained or not sure if trained as interpreter/translator)
  o Interpretation or translation with contract language service organization (list organization, if known)
  o Other (please specify)
  o I’m not sure
  o We currently do not provide any of these services
• How does your department identify a need for translation or interpretation?
• How does your department most often use translation services or interpretation services?
• Does your department provide any of the following regarding the availability, use, or quality of language services? Select all that apply.
  o A language access coordinator who arranges interpretation and/or translation
  o Translated signs or notifications on how to submit a language access complaint (regarding accessibility or quality)
  o A way to track language services costs
  o A written language access plan and/or policy
  o Other (please specify)
  o I’m not sure
  o We currently do not have any of these

Section 4: Additional Questions

• Does your department receive any type of federal funding? (If yes, please name the source)
• Do you provide a portion of these federal funds to any outside organizations (e.g. through grants to nonprofits or payments to subcontractors)?
• Do you have any other comments or information you’d like to share regarding language services in your department?
• Would you like to be informed about the progress of Marion’s language access plan?
Appendix D: Summary of City of Marion’s Departmental Language Access Capacity Survey Results

Background and Purpose: In 2023, the Marion Building Integrated Communities (BIC) Team gathered information from each City department to learn about their current need and use of language access services by distributing an online departmental language access survey. The survey asked employees about their departments’ policies and procedures for facilitating language access, current language services available to them, and about current bilingual staff who use language skills as part of their job duties. The survey was divided into four sections:

1. Multilingual Employees & Staff Policies
2. Interactions with the Public & Customers Who Speak Languages Other than English
3. Language Assistance Services & Policies
4. Additional Questions – on federal funding (for department heads or directors only) and open-ended question for comments on departmental language access services (all respondents)

Responses have informed the development and implementation of the City of Marion’s Language Access Plan. A summary of key findings and more detailed breakdowns of responses in each section follow here. Note that the City hired one additional bilingual staff member who speaks Spanish after the survey was administered, but the results presented here do not reflect that hire.

Surveyed Departments and Staff:

Surveyed departments: Staff in 100% of the City’s 7 departments participated in the Language Access Survey. The survey was distributed to all department directors or managers and all employees within each department. The response rate to the survey was about 70% (66 out of 92 employees), and 11 department heads or senior managers completed the survey on behalf of their units.

Responding Departments:

- Administration
- Finance
- Fire
- Planning & Development
- Police
- Public Works
- Water & Wastewater Treatment
Section 1: Multilingual Employees and Staff Policies

Two City departments have staff who speak a language other than English. The staff who speak Spanish use the language on the job at least once a week.56

- The Police Department and the Fire Department have staff who speak Spanish.
- Additionally, the Police Department has an officer who speaks Hmong, but who does not currently speak Hmong on the job.

The Police Department reported hiring officers for skills in languages other than English as part of their job description. No departments report providing compensation for or assessment of skills in languages other than English.

- No department reported having employees’ language proficiency, interpretation, or translation skills assessed by an independent language services provider.
- No department reported offering additional monetary compensation to employees who speak languages other than English and use those skills on the job.

Officers in the Police Department reported having attended state in-service trainings on interacting with community members who speak languages other than English, including American Sign Language. Police officers also report having received training in using Language Line for on-demand telephonic interpretation needs.

- Some respondents in the Sanitation and Police departments noted wanting training in basic Spanish and/or ASL skills to better serve the community members they interact with.

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56 These results reflect a combination of self-reporting and department directors reporting on behalf of staff in their departments. The survey did not ask about levels of proficiency or fluency in languages, so these results do not necessarily show the number of fully bilingual or multilingual staff. The survey did not ask about respondents’ preferred languages.
Section 2: Interactions with the Public and Customers Who Speak Languages Other than English

Spanish is the language that staff report encountering most frequently on the job, with slightly more than half of respondents noting they encounter the language on the job at least occasionally. A third of respondents across various departments noted that they encounter Spanish “very frequently” or “frequently.” Staff in the Fire Department and the Police Department also report encountering American Sign Language, Chinese, and Hmong less frequently. Utility Maintenance reported having encountered French, though “almost never.”

Departments that most frequently encounter languages other than English are:

- Administrative (accounting)
- Fire
- Planning and Development
- Police
- Sanitation
- Utility Maintenance
- Water & Wastewater Treatment

Most respondents noted that their departments do not use a standardized method to identify community members’ preferred languages, to identify a need for interpretation or translation, or to collect data to track languages that staff encounter. Some respondents who work in the Police Department noted simply asking community members what language(s) they prefer to speak.
Section 3: Language Assistance Services & Policies

Most City departments do not report a standardized method or procedure for requesting interpretation or translation when needed. **About a third of respondents noted reaching out to City staff who are bilingual, but not necessarily trained or assessed for interpretation or translation skills.** This represents the most-used language resource. Respondents across City departments note requesting interpretation services from staff in the Police department.

The **Fire** and **Police** departments noted having access to telephonic or video remote interpretation through a contract language service organization (or via coordination with McDowell County’s Emergency Management).

The following table summarizes the resources that staff report using to communicate with community members who speak languages other than English (“LOTE”):

<table>
<thead>
<tr>
<th>Resources available to staff to communicate with community members who speak LOTE</th>
<th>Departments reporting service/method</th>
</tr>
</thead>
</table>
| Staff members who are trained translators or interpreters | Administration (referring to staff in other dept)  
Fire  
Police |
| Staff members who are bilingual or multilingual, but not certified translators or interpreters (or not sure if colleagues are certified) | Planning & Development (referring to staff in other dept)  
Police |
| Interpretation or translation with a contract language service organization | Police |
| Over-the-Phone Interpretation | Police  
Fire  
Sanitation |
| Video interpretation | Police |

Some respondents mentioned that community members often bring friends or family members to interpret for them. Others also mentioned using apps such as the iPhone translation app to communicate during interactions with residents who prefer to speak languages other than English. **Recommended best practices are to use qualified interpreters and/or translators; a language access plan will help staff avoid using family and/or community members for interpretation and unvetted automatic or machine translations.**

City departments note they **are already regularly providing the following communications or other language services for community members** who speak languages other than English:

**Administration:**
- Some printed flyers or announcements (unspecified) in Spanish

**Fire:**
- Fire prevention materials available in Spanish
Planning and Development:
- Fair housing flyers and brochures available in Spanish
- Information on tenant/landlord rights in NC available in Spanish

Police:
- Any department form/communication can be translated into Spanish

Public Works:
- Sewer smoke test notice (door hanger) in English and Spanish

Tax Collections:
- Some signage and flyers (unspecified)
Section 4: Additional Questions – Federal Funding (for department directors or heads only) and Open-Ended Question for Comments on Departmental Language Access Services (for all respondents)

Three departments – Fire, Planning & Development, and Police – reported receiving federal funding. None of these three departments noted providing a portion of these federal funds to organizations outside of the City government.

- The Fire Department reports receiving funding from Federal Emergency Management Agency (FEMA)
- The Planning & Development Department reports receiving funding from the Environmental Protection Agency (EPA), United States Department of Agriculture (USDA), and Housing and Urban Development Community Block Development Grant (HUD CBDG)
- The Police Department reports receiving funding from the North Carolina Governor’s Highway Safety Program (NCGHSP) and Governor’s Crime Commission (GCC) grants

This section also asked all respondents the following question: “Do you have any other comments or information you’d like to share regarding language services in your department?” Responses are included below. Potentially identifying information has been redacted.

- My department receives requests for information...to obtain permits. Most of my interactions with people having English as a second language are predominantly Spanish speaking. When this occurs, typically a family member or friend accompanies them to assist with interpretation.
- We definitely need a big upgrade for total inclusivity!
- It would be helpful to have training in other languages to include sign language.
- I would like to learn Spanish.
- It would be nice to speak Spanish to be able to interact with people.
- [My] Department is in need of information packets in Spanish.
- When interacting with Spanish-speaking customers, their children have been used as interpreters. As a suggestion, the Annual Drinking Water Quality Report could be posted on the City website in Spanish as well as English.