



National Aeronautics and
Space Administration

Dryden Flight Research Center
Edwards, California

Language Assistance Plan (LAP)
For Accommodating Persons with
Limited English Proficiency (LEP)
in NASA-Conducted Programs and Activities

Equal Employment Opportunity Office
April 2001

**Language Assistance Plan (LAP)
For Accommodating Persons with
Limited English Proficiency
in NASA-Conducted Programs and Activities**

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1 Purpose

The NASA Dryden Flight Research Center (DFRC) Language Assistance Plan (LAP) was prepared in compliance with Executive Order 13166 entitled “Improving Access to Services for Persons with Limited English Proficiency.” The purpose of this executive order is to improve access to federally conducted and assisted programs for persons who, as a result of national origin, are limited in their English proficiency (LEP).

Dryden has developed the LAP as a guide to use when preparing its federally conducted programs and activities to ensure access by LEP persons and to assist in fulfilling its responsibilities to LEP persons.

2 Scope

The LAP administered by the Dryden Equal Employment Office (EEO), in partnership with the Public Affairs, Commercialization, and Education Office and the Human Resources Office (other Dryden entities), has examined the services it provides and will, on an on-going basis, develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the Center.

The Dryden LAP will focus on two primary impact points where the highest probability for LAP implementation exists, including Zone 1 (Public) and Zone 2 (Government), of the Science Communications Working Group Final Report (Chart 1).

The LAP will focus on the LEP population in the southern portion of the state of California areas and other LEP populations as they interface with Dryden. Our research (primarily from the 2000 U. S. Census) indicates that the California minority population is comprised of 32 percent Hispanics and 16.8 percent “other.” The Los Angeles county population, which is where Dryden is located, is comprised of 45 percent Hispanics and 23.5 percent “other.” The Antelope Valley population, which includes the cities of Lancaster, Palmdale, Rosamond, Mojave, and Tehachapi, is comprised of an average of 25 percent Hispanics and 5 percent “other.” Dryden will primarily focus on the Spanish-speaking population since that is largest LEP in its demographic area.

3 References

- Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d.
- Regulations implementing Title VI, provided in part at 45 C.F.R. Section 80.3 (b).
- Executive Order 13166 entitled “Improving Access to Services for Persons with Limited English Proficiency.”
- NASA Policy Directive 2090.5B, effective October 17, 1997 (Nondiscrimination in Federally Assisted and Federally Conducted Programs of NASA-Delegation of Authority), expires October 17, 2002.

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4 Background

English is the predominant language of the United States. According to the 2000 Census, English is spoken by 97 percent of its residents. Of those U. S. residents who speak languages other than English at home, the 2000 Census reports that 79 percent above the age of 5 speak English, "...well to very well." However, the U.S. is home to millions of national origin individuals who are "limited English proficient." That is, they cannot speak, read, write, or understand the English language at a level that permits them to benefit from NASA-conducted programs and activities. Accommodation of limited English proficiency through the provision of effective language assistance will allow Dryden to meet its obligations under Executive Order 13166. The policy guidance is consistent with a Department of Justice (DOJ) directive noting that recipients of federal financial assistance have an obligation, pursuant to Title VI of the Civil Rights Act of 1964, as amended, and its prohibition against national origin discrimination, to provide oral and written language assistance to LEP persons.

The policy guidance is also consistent with a government-wide Title VI regulation issued by DOJ in 1976, "Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs," 28 C.F.R. Part 42, Subpart F. That regulation addresses the circumstances in which recipients must provide written language assistance to LEP persons. Executive Order 13166 requires federal agencies to adopt the same principles and requirements applied to federal recipients of financial assistance in the conduct of their respective programs and activities.

On January 12, 2001, NASA Administrator Dan Goldin signed the NASA Language Assistance Plan for Accommodating Persons with Limited English Proficiency in NASA-Conducted Programs and Activities. The plan establishes the goal for each NASA center, including Headquarters, to provide quality language assistance to LEP persons, as appropriate, in its respective programs and activities. Each center has the responsibility to prepare an LAP for LEP persons by April 30, 2001.

5 Quality Records and Forms

None required for this Work Instruction.

6 Definitions

6.1 Limited English Proficient (LEP) person – a person who lives in the U. S. who cannot speak, read, write, or understand the English language at a level that permits him/her to interact effectively with health care providers and social service agencies. Because of these language differences and their inability to speak or understand English, LEP persons are often excluded from programs, experience delays or denials

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of services, or receive care and services based on inaccurate or incomplete information.

6.2 Language Assistance Plan (LAP) - The Dryden plan prepared in compliance with Executive Order 13166, entitled “Improving Access to Services for Persons with Limited English Proficiency.”

6.3 Science Communication Working Group (SCWG) – Initiated in 1995 by the NASA Chief Scientist in response to suggestions from a forum chaired by NASA Administrator and Dr. Carl Sagan, in which several participants raised concerns that NASA’s scientific knowledge was difficult to obtain. The report acknowledged the work of the group and demonstrated where their work fit in the scope of NASA’s communication efforts within Zone 1: Public--Layman, Uninterested/Knowledgeable, Unknowledgeable; Zone 2: Government--Libraries/Museums/Planetariums, Education, Publishers, Media; Zone 3: Industry Applications/Technology Transfer; and, Zone 4: Research Community/Science Institutes.

6.4 Vital – The DOJ’s definition of programs and activities that are a matter of life or death versus programs and activities open to the public and considered informational/background only and are therefore not vital.

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7 Responsibilities

7.1 Senior Center Management

Senior Center Management is ultimately responsible for:

- Creating the organizational climate
- Influencing the organizational culture
- Allocating the resources at Dryden necessary to implement the LEP LAP

7.2 Dryden Employees

Dryden employees are responsible for seeking reasonable avenues available to them to comply with LEP requirements.

7.3 Dryden Organizations

The following organizations have primary responsibility for the preparation and dissemination of information to Zones 1 and 2:

- **The EEO** will administer the LAP and will be responsible for updating the plan as required and will assist in finding Dryden employees who will volunteer with the assistance to LEP persons.
- **The Public Affairs, Commercialization, and Education Office (PACE)** has a variety of services and products designed to present and distribute information to the public, including media services, website development and maintenance, and outreach to the community. It develops, uses, and disseminates instructional materials and manages programs in support of education and outreach.

7.4 NASA Headquarters

NASA's organizational structure encompasses corporate, Agency-wide management and the management of the Aerospace Technology Enterprise, as well as the other Enterprises, through which it implements its mission and communicates with external customers. Agency-level management is responsible for Agency leadership, the development of NASA's strategy, and the integrated management of the Aerospace Technology centers. It is the external focal point for NASA communication and accountability.

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8 Core Principles

By implementing its LAP, Dryden will respond to requests for language assistance in a manner that ensures equal access by LEP persons to Dryden’s programs and activities. In order for the LAP to be effective, Dryden will adhere to the following core principles:

- **Assessment: Needs and Capacity**—Dryden will have in place mechanisms to assess, on an ongoing basis, the LEP status and language assistance needs of its target audience(s) in Dryden’s conducted programs and activities, as well as mechanisms to assess Dryden’s capacity to meet these needs according to the LAP.
- **Oral Language Assistance**—Dryden will arrange for the provision of oral language assistance to LEP persons in both face-to-face and telephone encounters in its conducted programs and activities where such assistance is requested and/or anticipated.
- **Translation of Written Materials**—Dryden will provide *vital* documents in languages other than English where there is a significant number or percentage of LEP persons in its target audience by conducted programs and activities.
- **Procedures**—Dryden will have in place specific procedures related to each of the plan’s core principles and designated staff/organizations who will be responsible for implementing activities relating to the Dryden LAP.
- **Notification of Availability of Free Language Services**—Dryden will inform the target audience of its conducted programs and activities, through oral or written notice in the relevant primary language, that free language assistance is available.
- **Staff Training**—Dryden will provide training to appropriate program staff on the policies and procedures of its language assistance activities.
- **Monitoring Accessibility and Quality**—Dryden will institute procedures to monitor the accessibility and quality of language assistance activities for LEP persons in its conducted and activities.

9 Process

9.1 Establish LAP Committee

Dryden has established the LAP Committee to write this LAP and jointly assure compliance with Executive Order 13166. The Committee is comprised of representatives from the EEO and PACE Offices. The Committee will request advice and input from other Dryden organizations when appropriate.

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9.2 Determine LEP needs and capacity

Dryden has conducted the current status of programs and activities and their impact on LEP. We have grouped the programs/activities by “information” and “education.” The following is the list of those programs/activities, the number and proportion of LEP recipients/beneficiaries, frequency of contact, nature and importance of the benefit/program, and resources available. We have determined all of these to be non-vital.

Informing the Public: Communication with the Public as Part of On-going Agency Operations

Programs/Activities	Number and Proportion of LEP Recipients/Beneficiaries*	Frequency of Contact	Resources Available
Speaker’s Bureau	General public, students, business and civic organizations	Unpredictable	Bilingual employees, bilingual pamphlets, and case-by-case responses as appropriate
Exhibits-conferences and public events	General public, students, business and civic organizations	Some unpredictable, some annual	Bilingual employees and case-by- case responses as appropriate
Visitor Center	General public, students, business and civic organizations	Daily	Bilingual employees, bilingual pamphlets, and case-by-case responses as appropriate
Public use websites	General public	Unpredictable	Case-by-case responses as appropriate

*Dryden’s expectation is that less than .5 percent of participants in these programs would expect LEP assistance.

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Educating the Public: Public Contact Administered by the Agency for Program Beneficiaries and Participants

Programs/Activities	Number and Proportion of LEP Recipients/Beneficiaries*	Frequency of Contact	Resources Available
Speaker's Bureau	General public, students, business and civic organizations	Based on requests	Bilingual employees and case-by-case responses as appropriate
Business outreach	Businesses and universities	Unpredictable	Bilingual employees and case-by-case responses as appropriate
Public use websites (including education websites)	General public	Unpredictable	Case-by-case responses as appropriate
Various students and faculty summer programs	Participants must speak English to work at Dryden	Annual	Case-by-case responses as appropriate
Distance learning	Students and educators	Unpredictable	Bilingual employees and case-by-case responses as appropriate
Educator Resource Center	Educators and education organizations worldwide	Unpredictable	Case-by-case responses as appropriate

*Dryden's expectation is that less than .5 percent of participants in these programs would expect LEP assistance.

9.2 Inform staff and public of its LEP services and policies by

- Distribution of Dryden announcement specifying the formal policy
- Presentation of information to Senior Staff
- Meetings with Center organizations most involved in public programs and activities and where language assistance is likely to be needed
- Establishment of web link from Dryden homepage to other Dryden homepages with LEP assistance information, where appropriate
- Development of process to have ready access to proficient interpreters in a timely manner
- Development of notification plan for LEP beneficiaries, including notice of no charge for the service
- Compilation of list of volunteer employee interpreters who are competent in both English and at least one other language
- Develop a plan for providing written materials in languages other than English, where the expectation is that a large number of LEP persons may utilize Dryden's programs or activities.

9.3 Training

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- Prepare and present training for appropriate personnel responsible for LAP implementation.
- Prepare and present training for volunteer employees who will assist with the LAP implementation.

9.4 Oversight

- The EEO will monitor the LAP in partnership with the other members of the LAP Committee.
- The LAP Committee will develop metrics to determine the best method of measuring the effectiveness of the LAP.