

# LANGUAGE ASSISTANCE PLAN FOR LIMITED ENGLISH PROFICIENCY PERSONS

# CITY OF DALLAS DEPARTMENT OF AVIATION DALLAS, TEXAS

Para solicitar una copia de este documento en español, comuníquese con el Centro de Comunicaciones del Aeropuerto al (214) 670-LOVE (5683) o por correo electrónico a 214670love@dallascityhall.com

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Public transportation services, such as those provided by the Department of Aviation (DOA), are considered an essential service to modern society. In an effort to ensure that our services are accessible to Limited English Proficiency (LEP) individuals, the airport incorporates several measures to ensure that LEP individuals have access to the benefits and programs sponsored by the Department of Aviation.

This plan, prepared in accordance with Department of Transportation requirements, outlines the Department of Aviation's commitment to ensuring a discrimination-free environment and to providing services that benefit all of our patrons and guests, including those with limited English proficiency.

Should you feel that you have been discriminated against due to your limited use of the English language you are kindly urged to submit a written complaint in accordance with our Title VI complaint process outlined later in this document. Our team will look into any and all complaints of discrimination and will take appropriate action as necessary to resolve any issues.

The Department of Aviation is here to Lead the Evolution of the Airport Experience and this includes ensuring all patrons of our airport receive the highest level of service possible regardless of their background.

If you need any assistance during your visit, please contact any member of our dedicated staff.

Thank you for choosing the City of Dallas, including Dallas Love Field, Dallas Executive Airport and the downtown Convention Center Veritport for your transportation needs!

Sincerely,

Mark Duebner Director of Aviation

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## Introduction

The City of Dallas, Department of Aviation operates the Dallas Love Field and Dallas Executive Airports, as well as the downtown Kay Bailey Hutchison Convention Center Vertiport. Dallas Love Field (DAL) is a medium-hub airport located in North Central Texas, centrally located in the City of Dallas. DAL provides airline passenger services, air cargo, and general aviation services. DAL is located approximately 5 miles north of downtown Dallas and 1.75 miles east of Interstate 35E.

DAL served over 15.7 million passengers in 2017, with three (3) major airlines. Additionally, DAL is served by six full service Fixed Base Operators (FBOs) that offer maintenance, fuel sales, hangar rental, and charter services.

Dallas Executive Airport (RBD) is a 1,040-acre General Aviation reliever airport, located 10 miles south of downtown Dallas.

As a recipient of federal assistance, the Department of Aviation is required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Additionally, the Civil Rights Restoration Act of 1987 defines the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal assistance.

# Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 provides that "no persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance." from the Department of Transportation. To ensure compliance the Department of Aviation must also comply with Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*. The Federal Aviation Administration has issued compliance guidance that includes the development of a Language Assistance Program under the Limited English Proficiency (LEP) provisions. These provisions require recipients of federal financial assistance to take reasonable steps to ensure "meaningful" access to the information and services provided by the agency.

# Limited English Proficiency (LEP) Individuals

LEP individuals are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English as a result of their national origin. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

The City of Dallas, Department of Aviation Limited English Proficiency Plan ensures information and services are accessible to LEP individuals by providing guidance on translation, interpretation, and outreach services for LEP individuals seeking access to Department of Aviation services and programs. The plan applies the four-factor framework, which is consistent with the TXDOT LEP provisions.

# Language Assistance Plan Overview

The purpose of Language Assistance Plan (LAP) is to address the identified needs of the Limited English Proficiency (LEP) populations served by the Department of Aviation. The DOA is committed to making its services, programs, and activities available to everyone regardless of language barriers.

Therefore, the LAP includes the following elements: Identification of LEP persons; Language Assistance Measures, Providing Notice to LEP Persons, Complaint Procedure, Staff Training and Monitoring and Updating the Plan.

The DOA used as resource the U.S. Department of Transportation's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP)* to prepare this LAP. DOA will periodically review and update this LAP in order to continue providing users equal opportunity and access to services and needs as well as remain complaint with Title VI of the Civil Rights Act of 1964.

# Identification of LEP Individuals

The identification of LEP individuals is a factor of the DOT's recommended four-factor analysis under the Limited English Proficiency (LEP) plan. This will illustrate the number or proportion of LEP individuals eligible to be served or likely to be encountered by a program, activity, or service sponsored by the Department of Aviation.

To better determine the local demographics of the City of Dallas, the US Census Bureau 2017 American Community Survey (ACS) Language Spoken at Home and Ability to Speak English for Population over 5 years and older was referenced which demonstrated that out of 2,357,598 persons (total population) within Dallas County, 1,057,559 or 44.86% speak a language other than English at home.

To identify the LEP population, the census category "Speak English less than well" was used as the point of reference. The demographic distribution under this category cited that 496,985 or 21.1% of the *total population* in Dallas County speaks "English Less than Well" indicating that the primary language for this population is another language other than English. The following provides a breakdown of the "other primary languages spoken" other than English in the Dallas County area:

36.21 % Spanish or Spanish Creole (5% LEP Threshold) 2.64% Other Indo-European languages 4.08 % Asian and Pacific Island languages 1.92% Other languages

This information provides a framework to help establish the Language Assistance Measures needed to ensure that LEP persons that come into contact with Department of Aviation sponsored programs and services have equal access and opportunities to its services, programs and activities without regard to language barriers or national origin.

# Language Assistance Measures

The following resources will be made available to accommodate LEP individuals, upon request, at one of two customer information booths located in both public and secured locations of Dallas Love Field, or by calling the Airport Communications Center at (214) 670-LOVE (5683), if at Dallas Executive Airport or the Convention Center Vertiport.

### 1. Oral Interpretation Services

Formal Interpreters – For scheduled programs, presentations, and activities, the DOA has access to a number of City employees who are bi-lingual. Some receive Language Skills Pay as a part of their compensation plan to provide face to face interpreting services in the work environment. In addition, the City contracts via master agreement, on-site interpreting services for City-sponsored events and public meetings.

### 2. Over-the-Phone Language Assistance Services

The DOA will distribute and/or make available the US Census "I Speak" cards to be used especially at the customer information booths to assist staff in identifying languages spoken by a customer. Once the language has been identified, free translation services will be provided through an over-the-phone language assistance service line. This service provides a certified translator in the customer's native language. The majority of the DOA's tenants/partners have the ability to provide access to a 24-hour language assistance line through their own contracted service. The DOA will provide assistance to those agencies that do not have an internal language assistance service in place.

### 3. Public Address Announcements

The DOA will broadcast security messages in both English and Spanish at Dallas Love Field to ensure the public address announcements reach the largest audience possible and can be heard throughout the terminal including outdoors at curbside.

### 4. Universal & Wayfinding Signage

Universal signage and symbols will be displayed throughout the Dallas Love Field and Dallas Executive passenger terminals and airport footprints, including curbside, parking lots (long and short term), and other publicly accessible locations. Additionally, wayfinding signage will be available in the terminal areas to help customers figure out where they are in the building, locate their desired destination, and work out how to get there from their present location.

# Providing Notice to LEP Individuals

The DOA will conspicuously display the U.S. Department of Transportation/FAA Unlawful Discrimination poster on Flight Information Display Systems (FIDS) throughout Dallas Love Field and in conspicuous locations within Dallas Executive Airport and the Downtown Convention Centre Vertiport to ensure that LEP individuals as well as the general public are informed that discrimination based on race, color, or national origin is prohibited within the DOA. This notification also includes the Title VI Coordinator contact information for the DOA.

programs, services, activities and events: public service announcements, briefings, brochures, media interviews, social media (Facebook), advertisements, and website at <a href="http://www.dallas-lovefield.com/">http://www.dallas-lovefield.com/</a>. DOA Title VI information can be found at <a href="http://www.dallas-lovefield.com/title-vi.html">http://www.dallas-lovefield.com/title-vi.html</a>.

# **Discrimination Complaint Procedures**

The Department of Aviation has established a process for customers to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, national origin or any other protected status may file a Title VI complaint.

Inquiries or complaints from the public during normal business hours can be reported verbally at (214) 670-LOVE (5683) or via the DOA Title VI complaint process, which can be found at\_<a href="http://www.dallas-lovefield.com/pdf/Title VI Complaint Procedures.pdf">http://www.dallas-lovefield.com/pdf/Title VI Complaint Procedures.pdf</a>. The Discrimination Complaint Form that will be available at Dallas Love Field's customer information booths. Additionally, complaints may be submitted directly to the Title VI Coordinator for DOA tenants, concessionaires, and other contractors.

All complaints will be investigated promptly. Reasonable measures will be taken to keep information confidential during the investigation process. The Title VI Coordinator will review every complaint, and when necessary, assign a neutral party to investigate. The investigator will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e. the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information
- Complete a final report of findings for the Aviation Director with a copy to the City of Dallas's Title VI Coordinator.

If a Title VI violation is found to exist, remedial and reasonable steps will be taken immediately. The Complainant will receive a formal response in writing that will include a description of the remedial actions that were taken to ensure that similar violations do not occur in the future. The investigation process and final report should take no longer than twenty-five (25) business days.

If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly in writing to:

City of Dallas / Department of Aviation Director of Aviation 7555 Lemmon Ave Dallas, TX 75209

Complaints may also be filed with the Federal Aviation Administration Office of Civil Rights, no later than 180 days after the date of the alleged discrimination to:

Federal Aviation Administration Office of Civil Rights, ACR-1 800 Independence Avenue, S.W. Washington, D.C. 20591 Copies of all Title VI complaints, statements and resolution/response documents handled by DOA's tenants, concessionaires and other contractors must be forwarded to the DOA Title VI Coordinator. Within 15 days of receipt, DOA will forward correspondence to the FAA's Office of Civil Rights in compliance with 49 CFR Part 21.

The Title VI Coordinator will maintain a log for tracking purpose of all Title VI complaints received through the complaint process. The log will include the following information: the date the complaint was filed; a summary of the allegation; the status of the complaint; and actions taken in response to the complaint.

# Staff Notification and Training

The LAP will be made available electronically to all DOA department staff. Additionally, all Aviation tenants/partners will be given a copy of the LAP by their respective department liaisons.

The following training will be provided to customer service personnel and volunteers working at the airport's Customer Information Booth:

- \_ Information on the Title VI Policy and LAP procedures
- \_ Description of language assistance services offered to the public
- \_ Documentation of language assistance requests
- \_ How to use the I-Speak cards and access the language assistance service line
- $\underline{\ \ }$  How to handle a potential Title VI/LEP complaint using DAL's complaint

**Procedures** 

# Monitoring and Updating the LAP

The DOA will review the LAP on an annual basis to ensure that existing services are sufficient to meet the needs of LEP customers and comply under the provisions of Title VI Civil Rights Act of 1964. However, on an as needed basis, DOA has the authority to make revisions and/or updates to the LAP in response to complaints or changes in the LEP community.