

## Language Assistance Plan for LEP Populations

### 1. Introduction

- a. Susquehanna Area Regional Airport Authority (SARAA) has developed this Limited English Proficiency (LEP) Plan to ensure that persons with LEP have meaningful access to our programs, services and activities.
- b. The purpose of the LEP is to ensure that no person shall, on the grounds of race, color or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any SARAA program or activity.

### 2. Definitions

- a. LEP - Limited English Proficient – person, who does not speak English as their primary language and has a limited ability to read, write, speak or understand English.
- b. Interpretation - the act of listening to something in one language (source language) and orally translating it into another language (target language)
- c. Translation - the replacement of written text from one language (source language) into an equivalent written text in another language (target language)
- d. Language Assistance Services – oral and written language services needed to assist LEP persons to communicate effectively with staff, and to provide LEP persons with meaningful access to airport sponsor programs or activities.

### 3. Service Overview

- a. SARAA is a public air transportation provider for the Central Pennsylvania region. Five airlines currently offer nonstop service to 13 cities across the United States. Services are provided to the general public 24 hours a day, 365 days a year.

### 4. Plan Summary

- a. SARAA has developed this LEP Plan to help identify steps for providing language assistance to persons with LEP who wish to access services provided by SARAA. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify persons with LEP that assistance is available and information for future plan updates. One of SARAA's LEP plan goals is to provide meaningful access for persons with LEP to all of our services, programs and activities.
- b. SARAA conducted a needs assessment using U.S. Department of Transportation's four-factor analysis:
  - i. Factor I  
The number and proportion of persons with LEP served or encountered in SARAA's eligible service population.
  - ii. Factor II  
The frequency with which persons with LEP come in contact with SARAA's programs, activities or services.
  - iii. Factor III  
The nature and importance of programs, activities or services provided by SARAA to the LEP population.
  - iv. Factor IV  
The resources available and overall cost to provide LEP assistance.

## 5. Summary of Four-Factor Analysis

- a. Factor I: The number and proportion of persons with LEP served or encountered in SARAA's eligible service population.
  - i. Examine prior experience with LEP individuals.
    1. SARAA provides air transportation services for a primary service area including the counties of Perry, Cumberland, Franklin, Adams, York, Dauphin, Lebanon and Lancaster.
  - ii. Become familiar with data from the U.S. Census
    1. Working with the Pennsylvania State University Data Center has shown that the primary service area has a higher percentage of persons that speak Spanish, Asian/Pacific Islander, Indo-European and "other" as their first language.
  
- b. Factor II: The frequency with which Persons with LEP come in contact with SARAA's programs, activities or services.
  - i. SARAA staff members, parking attendants and bus drivers were given a survey regarding interactions with LEP population.
    1. SARAA staff report that they have limited interactions with persons with LEP. Most of the limited interactions are with persons who speak Spanish as their primary language. The staff reports that there is no specific time of influx with these interactions.
  
- c. Factor III: The nature and importance of programs, activities or services provided by SARAA to the LEP population.
  - i. SARAA believes that the following services we provide to our customers are critical:
    1. Customer Service Information
      - a. Directions
      - b. Bathroom Locations
      - c. Car Rental Information
      - d. Hotel/Lodging Information
      - e. Airline Information
      - f. Complaint and Recommendations
      - g. Emergency Communications Instructions

If LEP is a barrier to using these services then consequences for these individuals could be problematic and lead to frustration from all parties involved.

Semi-annually, SARAA will review public information notices, facility and vehicle signage, and take actions as appropriate to assist persons with LEP. Critical information may include emergency preparedness, safety, directions, flight information as well as security matters.

- ii. Review input from community organization and Persons with LEP
  1. SARAA has worked with Harrisburg Area Community College and Penn State University. Combining their information with its experiences, SARAA has found that morning and late afternoon arrivals HIA have

higher numbers of LEP individuals utilizing its services. SARAA has also found that Harrisburg Area Community College and Penn State University serve a higher number of Asian language speaking passengers.

- d. Factor IV: The resources available and overall cost to provide LEP assistance.
  - i. Inventory language assistance measures currently being provided along with associated costs.
    - 1. SARAA has provided the following language assistance measures (however the costs of these measures have not been tracked):
      - a. SARAA staff members who are bilingual in English and Spanish provide translation as needed.
      - b. Linguistica International interpretation services – An interpreter service to meet language barriers for people with LEP. Offering interpretation for over 190 languages.
        - i. Contact number – 1-866-908-5744, Pennsylvania State Contract, No: 4400016753 SAP Vendor # 404779

SARAA will conduct public outreach initiatives such as attending fairs with local colleges (Penn State University, HACC) as well as working with the Hispanic Chamber of Commerce of Central PA to determine additional events or actions to take in order to determine other language assistance measures that would benefit the LEP community. These initiatives will be documented and costs will be estimated to adopt identified measures.

- ii. Determine what, if any, additional services are needed to improve meaningful access.
  - 1. Company website should allow for translation of text including schedules, directions and contact information in multiple languages.
  - 2. Signage should be evaluated in the terminal building, curbside, in the buses as well as the garage and long term parking.
- iii. Analyze our budget
  - 1. SARAA is committed to ensuring persons with LEP have meaningful access to SARAA's programs, services and activities. SARAA will conduct public outreach, review printed information pieces as well as signage to identify critical LEP items that could be provided in Spanish. A cost/benefit analysis will be conducted and be prioritized and implemented in order of significance within budget.
- iv. Consider cost effective practices for providing language services
  - 1. SARAA will work with local agencies and community organizations to provide cost effective practices such as:
    - a. Distributed directions and maps of the airport;
    - b. Educate agencies and organizations about SARAA's services;
    - c. Work with local and state agencies to increase our language assistance products and services; and

- d. Work with community organizations to assist SARAA with LEP services.

## 6. **SARAA's LEP Implementation Plan**

The following are the details to implement SARAA's LEP Plan which includes language assistance measures. In summary, implementing the plan requires self-assessment, determining how persons with LEP interact with SARAA, identifying and assessing LEP communities, providing language assistant services, training staff on policies and procedures, providing notice of language assistant services and monitoring, evaluation and updating of the policy.

- a. Identifying LEP individuals who need language assistance
  - i. SARAA's primary service area spans over multiple counties. After conducting our four factor analysis and reviewing demographics of the counties, we found that in the counties that SARAA provides service, there are a higher percentage of persons that speak Spanish, Asian/Pacific Islander, Indo-European and "other" as their first language.

In performing the analysis we have also found that on a daily basis our bus operators, parking attendants and staff have limited interactions with customers speaking Spanish or Asian/Pacific Islander.

Public outreach initiatives will enable SARAA to determine concentrations of persons with LEP in our service areas and this effort will result in the ability to better target our LEP initiatives.

- b. Language assistance measures
  - i. For written and/or oral language, SARAA staff may utilize bilingual staff members.
  - ii. For written and oral language, SARAA will utilize the services contracted through Linguistica International.
  - iii. When written communication is received from an LEP individual we will have a bilingual employee translate it into English and then respond back to the customer in the customer's native language (if possible).
  - iv. SARAA will review the following initiatives for possible implementation:
    - 1. Translation services for website information
    - 2. Public service materials in English, Spanish and Asian/Pacific Islander
    - 3. Review signage in and outside of the terminal
  - v. SARAA will review, monitor and update this LEP Plan and take the following steps:
    - 1. Ensure that our internal and external translators demonstrate their ability to accurately translate English and the other languages in which they are fluent.

2. Ensure outside resources are versed in our industry terminology so they can better serve the community.
3. Instruct the interpreter or translator that they should not deviate into the role as counselor, legal advisor, or any other role aside from interpreting or translating.
4. Request that the interpreter or translator attest that they will not have conflict of interest on the issues for which they would be providing interpretation services.
5. Review demographics, public outreach and adjust the LEP Plan as needed.
6. Document the services that were needed and provided.

c. Training staff

- i. Identify employees that are likely to come into contact with persons with LEP.
  1. SARAA's employees are likely to come into contact with individuals who are LEP. These include our customer service representatives, traffic control operators, dispatchers, police officers, firefighters and maintenance workers.
- ii. Identify existing staff training opportunities
  1. SARAA utilizes the following methods to implement and train our employees of their responsibility:
    - a. New hire orientation
    - b. Annual training of LEP programs and policies
    - c. Annual training of all staff in assisting LEP individuals.
    - d. Initial, annual and periodic management training and updates to Title VI+ Program including our LEP Plan.
- iii. Design and implement LEP training for SARAA staff
  1. SARAA will post and train all staff on the LEP Plan.
  2. SARAA will conduct this training at the time of hire as well as annually.
  3. Training will include the following:
    - a. Responding to LEP callers
    - b. Responding to LEP individuals in person
    - c. Responding to correspondence from persons with LEP
    - d. Responding and documenting persons with LEP needs
    - e. Responding to Title VI/LEP complaints

SARAA will also advise all staff of the demographics of our service area and number of LEP individuals that are in our service counties.

Annually SARAA will conduct diversity training that includes SARAA's LEP Plan.

## 7. **Providing notice to persons with LEP**

- a. Inventory the existing public service announcements and community outreach that SARAA currently performs.
  - i. SARAA will create and post a “If you need an interpreter” poster and post at pertinent areas within the terminal. If an employee at SARAA is able to translate he/she will translate; if there is not an employee available then we will utilize Linguistica International.
  - ii. SARAA will update the website for translation services
  - iii. SARAA will conduct an inventory of their public information pieces and determine which items should advertise that language assistance is available. The inventory will include schedules, maps, directions, customer service information, airline information, car rental and lodging information, press releases and advertisement, etc.
- b. Incorporate notice of the availability of language assistance into existing outreach methods.
  - i. SARAA will provide, through its website the ability to convert flight information, contact information and other pertinent information into various languages including Spanish and Asian/Pacific Islander.
  - ii. SARAA will work with community associations through outreach initiatives to identify where to place the advertisement of the availability of language assistance.
- c. Conduct targeted community outreach to LEP populations
  - i. Semi-annually, SARAA will attend community events, work with Hispanic and local Chambers of Commerce, colleges, businesses and other organizations to provide them with service information, bilingual materials, and advising them that we provide free language assistance. SARAA’s outreach efforts will focus on sites that Persons with LEP may attend or use such as colleges and local libraries.

## 8. **Monitoring and updating the LEP Plan**

Through ongoing outreach and surveying our customers, SARAA will monitor any specific requests or updates as needed.

The Marketing/Customer Service Department will continue to monitor and request continued feedback from both our parking office as well as our customer service staff who can provide actual feedback on changes in our service demographics.

As our services may change or are expanded, SARAA will analyze the demographics and modify our LEP Plan as needed, and communicate changes to employees and local community resources.

SARAA’s LEP Plan will be distributed to all employees. The LEP Plan will be explained during training sessions. SARAA will provide this plan to LEP community organizations, and explore the possibility of placing some portions of this Plan on our website.

Annually, SARAA will:

- Analyze demographics
- Maintain a record of LEP Plan activities
- Conduct an internal survey to determine frequency of encountering persons with LEP and their LEP language group and whether SARAA's language assistance measures are working
- Review nature and importance of SARAA's activities and services to persons with LEP with input from community outreach
- Conduct cost/benefit analysis of LEP initiatives
- Conduct internal monitoring to determine how language assistance measure and staff training are working including observing staff and their interactions with persons with LEP
- Establish a process and monitor whether SARAA's language services are meeting the needs of persons with LEP
- Obtain feedback from the community to determine demographic changes, satisfaction with SARAA's language assistance measures, satisfaction with SARAA's outreach, and suggestions for improvement
- Conduct staff training and ascertain whether or not they can successfully implement the LEP plan
- Monitor compliance to evaluate whether the LEP Plan is successful including monitoring complaints and response rate to LEP individuals and LEP issues
- Update LEP resources
- Review new services for the possibility of providing language assistance measures
- Update and implement language assistance measures
- Update the LEP Plan including policies, procedures and training
- Document all LEP interactions.

## **Bibliography**

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