Language Access Plan
Improving Access to Service for Persons with Limited English Proficiency
NASA Kennedy Space Center
Conducted Programs And Activities

Name and Title of Responsible Official:

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Approved by:

Robert D. Cabana  
Director,  
NASA Kennedy Space Center
INTRODUCTION

Under Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," (2000) NASA, as a Federal agency, is required to take steps to provide meaningful access to its programs and activities to members of the public who are limited in their English proficiency (LEP). At NASA, this would include: NASA onsite Visitors’ Centers; emergency evacuation signage; education and awareness opportunities, for example, programs designed to inspire the next generation of scientists, engineers, and explorers, such as astronaut appearances and remarks at schools; international partner delegations; and guided tours of NASA Centers.

English is the native language for most people living in the United States. There are others for whom English is not their primary language. If they also have limited ability to read, write, speak, or understand English, they have limited English proficiency, or “LEP.” For them, language can be a barrier and may require language assistance to accessing benefits or services, understanding and exercising important rights, or understanding other information provided by federally funded programs or activities at NASA.

PURPOSE

The NASA Kennedy Space Center (KSC) Language Access Plan (LAP) is prepared in compliance with Executive Order 13166, and, has been updated to maintain consistency with the NASA Language Access Plan.

NASA-CONDUCTED PROGRAMS

U. S. Department of Justice guidance on Executive Order 13166 states that the definition of federally conducted programs is the same under Executive Order 13166 as the definition used under the regulations for application of Section 504 of the Rehabilitation Act of 1973 to federally conducted programs. The Department of Justice Section 504 regulations provide the following definition:

“A federally conducted program or activity is, in simple terms, anything a Federal agency does. Aside from employment, there are two major categories of federally conducted programs or activities covered by the regulation: those involving general public contact as part of ongoing agency operations, and those directly administered by the department for program beneficiaries and participants. Activities in the first part include communication with the public (telephone contacts, office walk-ins, or interviews) and the public’s use of the Agency’s facilities (cafeterias, library). Activities in the second category include programs that provide Federal services or benefits.”

SCOPE

The LAP, administered by the KSC Office of Diversity and Equal Opportunity (ODEO), has examined the services it provides and will, on an ongoing 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. Examples of populations of NASA likely to include LEP persons and which must be considered when planning for the provision of language services include, but are not limited to:

- Students enrolled in NASA-conducted science, mathematics, and technology activities, and their parents or other family members.
- Individuals participating in NASA programs and activities such as orientations, briefings, and exhibits.

ASSESSMENT: ANALYSIS OF FACTORS

KSC will take reasonable steps to ensure meaningful access to its conducted programs and activities by LEP persons, whether responding to a request for language assistance services, or taking proactive measures consistent with the requirements of the Executive Order. The Department of Justice instructs Federal agencies to consider an individualized assessment that balances the following four factors:

1. The number or proportion of LEP individuals eligible to be served or likely to be encountered by the program or activity.
2. The frequency with which LEP individuals come into contact with the program or activity.
3. The nature and importance of the program or activity to people’s lives.
4. The resources available and costs.

The KSC LAP will focus on the LEP population in the state of Florida and other LEP populations as they interface with KSC.

Factor 1: Number or Proportion of LEP Individuals in the Eligible Population

The Brevard County population, which is where KSC is located, is composed of 8.1 percent Hispanic, and 2 percent Asian. The KSC population is composed of 10.5 percent Hispanic/Latino and 4.3 percent Asian/Pacific Islanders. KSC will focus primarily on the Spanish-speaking population since that is the largest LEP in the demographic area. The primary focus of the KSC LAP is to ensure the accessibility of all NASA programs and activities to all persons in the eligible population—the state of Florida. The 2011 American Community Survey indicates that, in Florida, 12 percent of the population age 5 years and over has difficulty speaking English, and 27 percent of the population in Florida age 5 years and over reported they speak a language other than English at home. KSC will focus primarily on the Spanish-speaking population since that is the largest LEP in the demographic area, but the Center will review and consider KSC’s overall visitor and customer requirements.

<table>
<thead>
<tr>
<th>Speakers of Languages other than English in Florida 2008-2010</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>French Creole</td>
</tr>
<tr>
<td>3.2 mil</td>
<td>295K</td>
</tr>
<tr>
<td>73%</td>
<td>7%</td>
</tr>
</tbody>
</table>
Factor 2: Frequency of Contact With the Program or Activity
Contacts with KSC are made through varied media: telephone calls to direct office numbers, mail, Internet Web site, e-mail, and in person. No data currently exists as to the precise number of LEP individuals served by or benefiting from KSC programs or activities. Organizations with the most potential for impact on the LEP population in the Florida area are the Office of Diversity and Equal Opportunity, Education and External Relations Directorate, and the Public Affairs Directorate.

Factor 3: Nature and Importance of the Program or Activity
KSC has a variety of information and products designed to present and distribute information to the general public. This information would be primarily for a large number of international visitors to the KSC Visitor Complex, where information is related to NASA history and missions. In addition, information is provided on health, safety and security requirements, and current hazardous weather patterns.

Factor 4: Available Resources and Funding
Resources available include but are not limited to:

- Bilingual employees, bilingual pamphlets, and case-by-case responses as appropriate.
- American Sign Language Interpreters: Support of meetings attended by deaf or hard-of-hearing NASA employees, guests, or viewers of NASA sponsored events. KSC utilizes contract interpreters.
- Foreign Language Tours: Motor coaches are equipped with closed-circuit televisions with DVD capabilities, which allow subtitles to be run with the video during KSC Visitor Complex group tours. Languages available include French, German, Italian, Japanese, Portuguese, and Spanish.
- Brochures and Visitor Guides: Available in English, Chinese, French, German, Italian, Japanese, Portuguese, and Spanish.
- In addition, NASA’s Web page for educators has several Spanish language NASA sites at: [http://www.nasa.gov/about/highlights/En_Espanol.html](http://www.nasa.gov/about/highlights/En_Espanol.html)

Funding is provided as a function of KSC Center Management Operations budget

MAJOR COMPONENTS OF KSC LAP

By implementing the LAP, KSC will respond to requests for language assistance in a manner that ensures access to LEP persons for KSC programs and activities. In order for the LAP to be effective, KSC will adhere to the following:

- **Assessment**: KSC will have in place mechanisms to assess, on an ongoing basis, the LEP status and language assistance needs of its target audience(s) in KSC-conducted programs and activities, as well as mechanisms to assess KSC’s capacity to meet these needs according to the LAP.

- **Oral Language Assistance**: KSC will arrange for the provision of oral language assistance to the LEP persons in both face-to-face and telephone encounters in its
conducted programs and activities where such assistance is requested and/or anticipated. Oral language assistance to LEP individuals will be provided as and where needed. KSC has an existing contract for interpreting services and telephonic interpreter services, which may be scheduled when activities are assessed (in accordance with the four factors) and requests are made at least 48 hours in advance of program initiation.

- **Translation of Written Materials:** KSC will provide vital documents in languages other than English when a significant number or percentage of LEP persons are in the target audience for KSC-conducted programs and activities. KSC will provide written translation services on a case-by-case basis as determined by each program and/or activity, based on the application of the four-factor criteria for language assistance and whether vital documents are involved. The assessment also considers census data reflecting the population speaking a language other than English. Written materials may include but are not limited to paper and electronic documents such as:
  - Applications to participate in a program or activity
  - Consent forms
  - Program or activity announcements or discontinuation of programs or activities
  - Notices advising LEP persons of free language assistance
  - Security or safety brochures for visitors to KSC facilities
  - Web sites
  - Correspondence

Organizational points of contact will use NASA Form 1681, Service Request Form, to request a translated program or activity document in languages other than English for distribution. Such organizations need to provide the form to the NASA Headquarters Office of External Relations with a Purchase Request using their organization’s funding to access these translation services.

- **Procedures:** KSC will have in place specific procedures related to each of the plan’s core principles and designated staff/organizations responsible for implementing activities relating to the KSC LAP. NASA Form 1681, Service Request Form (see Appendix B), will be a major source of assessment information. ODEO will collaborate with each of the identified organizations at KSC to assess their programs or activities for LEP. Responsible ODEO staff and KSC LEP points of contact have been identified. Contact list (Appendix D) will be updated as needed.

Request for language assistance may be initiated orally, in writing, or in any other format or medium that is convenient and practical for the individual seeking assistance. ODEO has responsibility for administering the KSC LAP; however, due to KSC’s specialized and varied work products and activities, each organization will decide on its own whether to grant a request for LEP assistance. Agency guidance directs each Center to have an individual Language Access Coordinator (LAC) who functions as KSC’s resource person for LAP and will be available for consultation to ensure the organization considers and...
responds to each LEP request in accordance with the KSC LAP. KSC’s designated LAC will have final decision whether or not to grant a request for language assistance.

The LAC will provide each organization with information and assistance in connection with processing a request for language assistance, including applying and interpreting the four-factor analysis to ensure consistency throughout the Center. Costs are borne by the organization requiring LEP resources for a program or activity.

ODEO will conduct an assessment annually of ongoing programs for LEP potential and requirements. Information gathered through the general public contact points during the previous year will be included in the annual assessment. All new programs should include an assessment for LEP potential as part of the development effort. In accordance with Agency guidelines, KSC LAP will be updated annually.

**Notification of Availability of Free Language Services:**

- Distribution of KSC announcement specifying the formal policy.
- Presentation of information to senior staff.
- Meetings with Center organizations most involved in public programs and activities where language assistance is likely to be needed.
- Establishment of Web link from KSC Home Page to other KSC Home Page, 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.
- Development of a plan for providing written materials in languages other than English, where the expectation is that a large number of LEP persons may utilize KSC programs and activities.

**Staff Training:** KSC will provide training on an as-needed basis to appropriate program staff on the policies and procedures of its language assistance activities. New employees will be notified of the program during New Employee Orientation. Briefings on the KSC LAP will be provided to senior staff. Employees will receive an annual written notification of the KSC LAP and guidance for obtaining translation services.

**Monitoring Accessibility and Quality:** KSC will institute procedures to monitor the accessibility and quality of language assistance activities for LEP persons in KSC-conducted programs and activities. ODEO will conduct an annual review with the provided self assessment tool provided by the Agency to ensure the scope and nature of language assistance services provided under the plan reflect updated information on the relevant LEP populations, their language assistance needs, and component experience under the plan.
KSC Organizations

- **ODEO** will administer the LAP, be responsible for updating the plan, as required, and will assist in finding KSC employees who will volunteer to assist LEP persons.

- **The Education and External Relations Directorate** has a variety of services and products designed to present and distribute information to the public and to support education and outreach to the community.

- **The Public Affairs Directorate** issues press releases, organizes press conferences, coordinates with media, and provides information to schools and universities. It is responsible for NASA television, news operations, guest services, and visiting public.

- **The Human Resources Office** develops, uses, and disseminates recruitment materials.

- **The Information Technology and Communications Services Directorate** provides development, integration, and operations in supporting the current and advanced information technology and communications needs of KSC institutional and NASA program customers.

Records and Forms

NASA Form 1206

In order to promote uniformity with other Government agencies, the normal NASA assurance will be in accordance with the requirements set forth in NASA Form 1206, Assurance of Compliance with the National Aeronautics and Space Administration Regulation Pursuant to Nondiscrimination in Federally Assisted Programs.

KSC review of LEP needs and their impact on programs/activities is grouped by “information” and “education.” The following is the list of those programs/activities, the nature and proportion of LEP recipients/beneficiaries, frequency of contact, nature and importance of the benefit/program, and resources available. These have all been determined to be nonvital.

**Informing the Public: Communication With the Public as Part of Ongoing Agency Operations**

<table>
<thead>
<tr>
<th><em>Programs/Activities</em></th>
<th>Number and Proportion of LEP Recipients/Beneficiaries</th>
<th>Frequency of Contact</th>
<th>Resources Available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family Day</td>
<td>KSC badged employees, family, and friends</td>
<td>Annual event</td>
<td>Bilingual employees, bilingual pamphlets, and case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Speakers Bureau</td>
<td>General public</td>
<td>Unpredictable: Approximately 100 groups a year</td>
<td>Bilingual employees, case-by-case as appropriate</td>
</tr>
<tr>
<td>Exhibits-conferences, schools and universities</td>
<td>General public, students, business and civic organizations</td>
<td>Some annual and as scheduled</td>
<td>Bilingual employees, case-by-case as appropriate</td>
</tr>
<tr>
<td>KSC Visitor Complex</td>
<td>General public, students, business and civic organizations</td>
<td>Daily, 1.6 million a year</td>
<td>Bilingual employees, bilingual pamphlets, case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Public-use Web sites</td>
<td>General public</td>
<td>Unpredictable</td>
<td>Case-by-case responses as appropriate</td>
</tr>
</tbody>
</table>

*KSC expectation is that less than 5 percent of participants in these programs may expect LEP assistance.

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

<table>
<thead>
<tr>
<th>Program/Activities</th>
<th>Number and Proportion of LEP Recipients/Beneficiaries</th>
<th>Frequency of Contact</th>
<th>Resources Available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Speakers Bureau</td>
<td>General Public, businesses and civic organizations</td>
<td>Based on requests</td>
<td>Bilingual employees, and case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Business outreach</td>
<td>Businesses and universities</td>
<td>Annual</td>
<td>Bilingual employees, case-by-case as appropriate</td>
</tr>
<tr>
<td>Public-use Web sites (including education Web sites)</td>
<td>General public</td>
<td>Unpredictable</td>
<td>Case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Various student and faculty summer programs</td>
<td>Participants must speak English to work at KSC</td>
<td>Annual</td>
<td>Case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Distance learning</td>
<td>Students and educators</td>
<td>Unpredictable</td>
<td>Bilingual employees, and case-by-case responses as appropriate</td>
</tr>
<tr>
<td>Educator Resource Center</td>
<td>Educators and education organizations worldwide</td>
<td>Unpredictable</td>
<td>Case-by-case responses as appropriate</td>
</tr>
<tr>
<td>KSC Visitor Complex education programs</td>
<td>Educators and education organizations worldwide</td>
<td>Approximately 90,000 students a year</td>
<td>Case-by-case responses as appropriate</td>
</tr>
</tbody>
</table>
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 CFR Section 80.3(b).
- Executive Order 13166 entitled, Improving Access to Services for Persons With Limited English Proficiency.
- 14 CFR 1250, Nondiscrimination in Federally Assisted Programs of NASA-Effectuation of Title VI of the Civil Rights Act of 1964.
APPENDIX A

OPERATING PROCEDURES FOR LANGUAGE ASSISTANCE REQUEST

The contractor will be issued a written task order at least five (5) working days in advance of the need of services by KSC. For primary languages, the Education and External Relations Directorate may place verbal task orders with as little as four (4) hours’ notice. Primary Languages: Chinese, French, German, Italian, Japanese, Portuguese, and Spanish.

For Instantaneous Telephone Interpreting Services, the contractor shall provide quick access to interpreters over the phone during business hours for all languages. This service is interpreting rather than handling public questions or requests for information.

http://www.schreibernet.com/site.nsf/Contact?OpenForm
http://www.schreibernet.com/site.nsf/Estimate?OpenForm
APPENDIX B

FORMS

Assurance of Compliance With the National Aeronautics and Space Administration Regulations Pursuant to Nondiscrimination in Federally Assisted Programs, NASA Form 1206

Service Request Form, NASA Form 1681
Assurance of Compliance with the National Aeronautics and Space Administration Regulations Pursuant to Nondiscrimination in Federally Assisted Programs

The __________________________ (Institution, corporation, firm, or other organization on whose behalf this assurance is signed, hereinafter called "Applicant") hereby agrees that it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 98-362), Title IX of the Education Amendments of 1972 (20 U.S.C. 1680 et seq.), Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), and the Age Discrimination Act of 1975 (42 U.S.C. 16101 et seq.), and all requirements imposed by or pursuant to the Regulation of the National Aeronautics and Space Administration (14 CFR Part 1250) (hereinafter called "NASA") issued pursuant to these laws, to the end that in accordance with these laws and regulations, no person in the United States shall, on the basis of race, color, national origin, sex, handicapped condition, or age be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Applicant receives federal financial assistance from NASA, and hereby gives assurance that it will immediately take any measure necessary to effectuate this agreement.

If any real property or structure thereon is provided or improved with the aid of federal financial assistance extended to the Applicant by NASA, this assurance shall obligate the Applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Applicant for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Applicant for the period during which the federal financial assistance is extended to it by NASA.

This assurance is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Applicant by NASA, including installment payments after such date on account of applications for federal financial assistance which were approved before such date. The Applicant recognizes and agrees that such federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the United States shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Applicant, its successors, transferees, and assignees, and the person or persons whose signatures appear below are authorized to sign on behalf of the Applicant.

Dated _________________________

(Applicant)

By ___________________________

(President, Chairman of Board, or comparable authorized official)

(Applicant’s mailing address)

NASA FORM 1206 JUN 01 PREVIOUS EDITIONS ARE OBSOLETE.
APPENDIX C

INTERPRETER/TRANSLATION SERVICES PROVIDER CONTACT INFORMATION

Interpreter Services:
Sign Language Interpreter Calendar
Telephone: (321) 861-8930
KSC-Sign-Language-Service-Calendar@mail.nasa.gov

Translation Services:
Schreiber Translations, Inc. (STI)
Document Translation and Interpretation
51 Monroe Street, Suite 101
Rockville, MD 20850
Phone: (301) 424-7737
Facsimile: (301) 424-2336
Contract #NNH08CC33G
http://www.schreibernet.com
Email: translation@schreibernet.com

Primary Support:
Contractor Representative – Pam Soffer, ext. 131

NASA Headquarters Point of Contact:
Devon Fleming
Director, Resources Management Division
Office of External Relations
Phone: (202) 358-1622
Facsimile: (202) 358-3099

Additional Support:
Bilingual employees – NASA and KSC Visitor Complex
APPENDIX D

KENNEDY SPACE CENTER POINTS OF CONTACT

Office of Diversity and Equal Opportunity:
ODEO Language Access Coordinator
Mail Code: AJ
Edward Wroblinski
edward.wroblinski@nasa.gov
Phone: (321)867-9170
Facsimile: (321)867-1066

Education and External Relations Directorate: Alternate
Mail Code: EX
Mary Ann Chevalier
m.chevalier@nasa.gov
Phone: (321) 861-7075
Facsimile: (321) 867-6226

Public Affairs Directorate:
Mail Code: PA
Mike Curie
michael.curie@nasa.gov
Phone: (321) 861-4769
Facsimile (321) 867-8007

Human Resources Office
Mail Code: BA-E
Dave Wilson
david.m.wilson@nasa.gov
Phone: (321) 867-1859
Facsimile: (321) 867-2454

Information Technology and Communications Services Directorate
Mail Code: IT-C
Roger Liang
roger.liang@nasa.gov
Phone: (321) 861-2224
Facsimile (321) 867-1490
APPENDIX E

U.S. CENSUS 2010 LANGUAGE IDENTIFICATION FLASHCARDS (1-38)
<table>
<thead>
<tr>
<th>Language</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arabic</td>
<td></td>
</tr>
<tr>
<td>Armenian</td>
<td></td>
</tr>
<tr>
<td>Bengali</td>
<td></td>
</tr>
<tr>
<td>Cambodian</td>
<td></td>
</tr>
<tr>
<td>Chamorro</td>
<td></td>
</tr>
<tr>
<td>Simplified Chinese</td>
<td></td>
</tr>
<tr>
<td>Traditional Chinese</td>
<td></td>
</tr>
<tr>
<td>Croatian</td>
<td></td>
</tr>
<tr>
<td>Czech</td>
<td></td>
</tr>
<tr>
<td>Dutch</td>
<td></td>
</tr>
<tr>
<td>English</td>
<td></td>
</tr>
<tr>
<td>Farsi</td>
<td></td>
</tr>
</tbody>
</table>
Cocher ici si vous lisez ou parlez le français.

Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.

Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.

Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.

अगर आप हिंदी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएं।

Kos lub voj no yog koj paub twn thiab hais lus Hmoob.

Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.

Markaam daytoy nga kahon no makabasa weno makasaoka iti Ilocano.

Marchi questa casella se legge o parla italiano.

日本語を読み、話せる場合はここに印を付けてください。

한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.

ใช้มาใช้สเปนิส หรือภาษาอังกฤษก็ได้.

Prosimy o zaznaczenie tego kwadratu, jeżeli posługujesz się Pan/Pani językiem polskim.
26. Portuguese

27. Romanian

28. Russian

29. Serbian

30. Slovak

31. Spanish

32. Tagalog

33. Thai

34. Tongan

35. Ukrainian

36. Urdu

37. Vietnamese

38. Yiddish