



EL PASO INTERNATIONAL AIRPORT



City of El Paso International Airport

*Language Assistance Plan for Limited English
Proficiency Individuals*



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Introduction

The City of El Paso is located in far west Texas on the international boundary between the United States and the Republic of Mexico. The City provides a full range of services to the general public including air transportation. The El Paso International Airport (EPIA) is the gateway to West Texas, Southern New Mexico and Northern Mexico. It provides airline passenger services, air cargo, and general aviation services. EPIA is located 6 miles east of downtown El Paso and 1.7 miles north of Interstate 10 Exit 25 (Airway Blvd).

The EPIA is a small hub airport serving 2.8 million passengers in 2014, with four (4) major airlines. Additionally, EPIA is served by two full service Fixed Base Operators (FBOs) that offer maintenance, fuel sales, tie down/hangar storage, flight instruction and charter services.

As a recipient of federal assistance, EPIA (City of El Paso Aviation Department) 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 be in compliance the EPIA 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 El Paso’s 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 City 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 EPIA. EPIA 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.

EPIA used as resource the U.S. Department of Transportation’s *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP)* to prepare this LAP. EPIA 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 compliant 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 at EPIA.

To better determine the local demographics of the City of El Paso, the 2010 US Census Report was referenced which demonstrated that out of 760,102 persons (total population) within the El Paso County area, 547,273 or 72% 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 236,648.64 or 31.13% of the total population in El Paso 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 El Paso County area:

30.45 %	Spanish or Spanish Creole
0.19%	Other Indo-European languages
0.35%	Asian and Pacific Island languages
0.14%	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 EPIA 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 may be available to accommodate LEP individuals:

1. Oral Interpretation Services

Formal Interpreters – For scheduled programs, presentations, and activities, EPIA may utilize the City of El Paso’s formal oral interpretation services that provide qualified and trained translators in both languages (English/Spanish) and may have knowledge of the relevant terms or concepts related to a program or activity and the dialect and terminology used by the LEP individual. This includes sign language interpreter services.

Informal Interpreters - When available and appropriate to the situation at hand, EPIA may provide bilingual staff within a reasonable time period to communicate with LEP individuals in their native languages and assist them in answering questions regarding services, programs and activities. Based on the population demographics of the City of El Paso, Spanish is the most frequent non-English language spoken by individuals most likely encountered by EPIA. As such, there are a number of City of El Paso (COEP) Aviation Department employees that are bilingual with Spanish and English who can assist in oral interpretation on a volunteer basis. Aside from COEP employees, employees from tenant/partners such as airline carriers, car rental agencies, gift concessionaires, food/beverage concessionaires and customer information centers can also provide volunteer bilingual translation with Spanish and English.

The use of family members, children, friends, and untrained volunteers as interpreters will be discouraged. However, the LEP person will be allowed to use an interpreter of their choosing if free language assistance services offered are rejected by the LEP person.

2. Over-the-Phone Language Assistance Services

EPIA will distribute and/or make available the US Census “I Speak” cards to be used especially at the customer information centers 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 EPIS’s tenants/partners have the ability to provide access to a 24-hour language assistance line through their own contracted service. EPIA will provide assistance to those agencies that do not have an internal language assistance service in place.

3. Public Address Announcements

EPIA will broadcast security messages in both English and Spanish to ensure the public address announcements reach the largest audience possible. The public

announcements take place every 30 minutes and can be heard throughout the terminal including outdoors at curbside.

4. Universal & Wayfinding Signage

Universal signage and symbols will be displayed throughout the passenger terminal and airport footprint including curbside, parking lots (long and short term), and customs processing center. Additionally, wayfinding signage will be available in the terminal area 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

EPIA will conspicuously display the U.S. Department of Transportation/FAA Unlawful Discrimination poster in its main public areas throughout the airport to ensure that LEP individuals as well as the general public are informed that discrimination based on race, color, or national origin is prohibited at EPIA. This notification also includes the Title VI Coordinator contact information for EPIA and/or internal coordinator for tenants, concessionaires and other contractors.

EPIA will employ the following media outlets to disseminate information on its programs, services, activities and events: public service announcements, briefings, brochures, media interviews, social media (Facebook), advertisements, and website at www.elpasointernationalairport.com including at the City of El Paso website at www.elpasotexas.gov. EPIA is committed to use the latest technological advances in translation such as Google Translate for its website.

Discrimination Complaint Procedures

EPIA 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 (915) 780-4781 (if after normal business hours contact (915) 780-4749) or in writing via the department's Contact Us webpage to elpasointernationalairport@elpasotexas.gov or by using the Discrimination Complaint Form that will be available at EPIA's customer service/information center and on EPIA's website. The customer service/relationship program accessed via the EPIA's website is monitored by a centralized administrator who is responsible for tracking the department's complaints, compliments and suggestions. Additionally, complaints may be submitted directly to the Title VI Coordinator for EPIA's 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 El Paso'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:

El Paso International Airport
Aviation Director
6701 Convair Road
El Paso, TX 79925

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 EPIA's tenants, concessionaires and other contractors must be forwarded to the EPIA Title VI Coordinator. Within 15 days of receipt, EPIA 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 EPIA 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 visitor centers such as the Customer Service/Information Booth, Military Information Booth, and USO:

- 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
- How to handle a potential Title VI/LEP complaint using EPIA's complaint procedures

Monitoring and Updating the LAP

EPIA 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, EPIA has the authority to make revisions and/or updates to the LAP in response to complaints or changes in the LEP community.