



**Miami Dade Aviation Department**  
P.O. Box 025504  
Miami, Fl. 33102-5504  
<http://www.miami-airport.com>

# **MIAMI-DADE AVIATION DEPARTMENT LEP PLAN**

Title VI of the Civil Rights Act of 1964 prohibits the discrimination on the basis of race, color, creed, sex or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that ‘no person in the United States shall, on the grounds of race, creed, color, sex, 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.’ The Aviation Department is committed to providing aeronautical services to the public regardless of race, creed, color, sex, or national origin. In addition, the Department is dedicated to maintaining compliance with language access requirements to ensure effective communication with limited English proficient (LEP) individuals as required by Executive Order 13166. This Plan was established to provide guidance in assessing our compliance and updating our practices as necessary.

## **A. Racial and Ethnic Data Analysis**

Title VI requires federal grant recipients to know its community demographics. This Plan establishes the Divisions that will assist in gathering demographic data for analysis.

- a. The Department is required to have available racial and ethnic data showing the extent to which members of minority groups are beneficiaries of the Department’s programs. The Minority Affairs (for Business Opportunities), Contracts (for Awarded contracts), Terminal Operations, Customer Service (Title VI Complaints), and the Landside (Taxi Lot complaints) Divisions will record data for the indicated areas. Data will be submitted to the Title VI Coordinator upon request.
- b. The Title VI Coordinator will identify trends in the data that reflect areas for additional review of discriminatory practices, areas where more information should be provided to minority groups and areas where additional training may be required.
- c. The Title VI Coordinator monitors aggregate responses received from a voluntary survey administered when airport patrons seek access to the airport’s public wi-fi network. The survey collects demographic information including sex, age, ethnicity and language spoken.

## **B. LEP Plan**

The objective of this Plan is to continually provide language assistance to our limited English proficient airport users and visitors to assure ongoing effective communication and access. An individual with limited English proficiency (LEP) is someone with limited ability to read, write, speak, or comprehend English. The Aviation Department will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. The Aviation Department has developed this Plan to help identify reasonable steps for providing language assistance to LEP persons who wish to access services provided by the Department.

- a. **Four-Factor Analysis:** In order to prepare this Plan, the Aviation Department referenced the U.S. Department of Transportation’s (DOT) four-factor LEP analysis. Following is each factor with the Department’s results:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
    - a) The Aviation Department reviewed, and continuously seeks guidance from U.S Census Bureau data for the percentage of population in Miami-Dade County that indicated that they spoke English “*less than very well.*” Further, the data was analyzed to determine which language(s) were the primary languages spoken by those who spoke English “*less than very well.*” Spanish is the predominant primary language in the Miami-Dade County service area representing 31% of the population (5 years and older) reflecting those who indicated that they spoke English “*less than very well.*” Languages of the remaining LEP populations represent less than 1% of the service area. Every effort is made to serve all members of the LEP community, as addressed in Section IV. C. d., below.
    - b) The Aviation Department also continuously reassesses the language needs in the region with data provided by the Department’s Marketing Division, Terminal Operations Division and the Minority Affairs Division (see Section IV. C. c., below).
  2. The frequency with which LEP persons come in contact with the Aviation Department programs, activities, or services.
    - a) The Miami-Dade Aviation Department serves individuals in the Miami-Dade Community, including the traveling public (with their family and friends), and employees (both directly and indirectly), and provides a number of public benefits and services, and is very likely to provide services to LEP populations frequently.
  3. The nature and importance of services provided by the Aviation Department to the LEP community.
    - a) The Aviation Department provides a number of services to the LEP community as noted in Section IV. C. d., below.
  4. The resources available to the Aviation Department and overall cost to provide LEP assistance.
    - a) The Aviation Department is committed and has allocated necessary resources to properly provide the necessary assistance to its LEP population.
- b. **Understanding How LEP Individuals Interact with MDAD:** Any interaction with the public has the potential to interact with LEP individuals. The majority of interactions occur within the Terminal areas. Additional interactions occur through MDAD’s website (<http://www.miami-airport.com>), informational telephone calls, and vendors doing business with MDAD.

- c. **Identification and Assessment of LEP Communities:** The Airport is required to identify our user and visitor language needs to assure they can access our benefits, programs and services:
1. The Marketing Division Liaison evaluates all airline flight and passenger data identifying predominant users and beneficiaries of the Airport. Use of this data provides ongoing assurance those language needs are being met throughout the Airport. Information gathered will be submitted to the Title VI Coordinator on a quarterly basis.
  2. The Terminal Operations and Customer Service Liaison documents all Title VI complaints from Terminal users relating to use of airport services, patronage at terminal concessions and interactions with our employees and business partners. The information gathered can identify language barriers not yet identified and preventing effective use of airport programs and services. Information gathered will be submitted to the Title VI Coordinator on a monthly basis.
  3. The Minority Affairs Division Liaison documents all Title VI complaints relating to airport business opportunities. Information gathered identifies those ethnic areas where language assistance needs to be enhanced and advertised business information needs translation enhancements. Information gathered will be submitted to the Title VI Coordinator on a monthly basis. The Liaison meets with minority businesses interested in doing business with MDAD and conveys any LEP needs encountered to the Title VI Coordinator, as needed, so additional services can be addressed.
  4. The Title VI Coordinator gathers and reviews the above documentation for areas of improvement and assesses compliance and identifies areas and topics where training may be necessary. All information will be filed for historical purposes.
- d. **Providing Language Assistance Services:** The Department has multiple language assistance services in place to serve the community. They include:
1. Oral language assistance is provided in the form of “in-language” communication at the main Tourist Information Counter at Concourse E by multilingual staff members communicating directly in an LEP person’s language. Additional spoken language interpretation services have been contracted by the Department and are available through on-demand telephone access (Language Line) with over 250 languages. Access to the Language Line services can also be obtained by staff contacting our Airport Operations Center who can connect a passenger to the service. The Information Counters are managed by the Department’s Terminal Operations Division. The Customer Service Division manages the Ambassador Information Program, whose mission is to provide information and assistance to the traveling public with volunteer staff. These volunteers wear name badges with the language they can speak by being stationed throughout the terminal and assisting LEP passengers to the nearest Tourist Information Counter for language services. The Terminal Operations Division staff, who are predominantly stationed

throughout the Terminal, have been equipped with tablets and phones that have the Voyce App which provides translation services in multiple languages further facilitating access for our LEP patrons.

2. Written language assistance is provided through the use of multilingual signage with related pictorials throughout the terminal, which assists LEP passengers identify areas of importance. Written language assistance is also provided via the Department's website (<http://www.miami-airport.com>) which provides information on all its programs and activities and is translatable into 105 languages to facilitate comprehension by LEP individuals seeking information.
  3. In the event of an emergency, evacuation procedures have been developed to efficiently evacuate LEP individuals. These procedures include bi-lingual announcements (in Spanish), hand gestures to indicate the direction to evacuate to, and multi-lingual employees providing instructions.
- e. **Staff Training:** Staff working with LEP individuals shall receive initial and periodic training on how to access all the language assistance services available to the traveling public. Terminal volunteers in the Volunteer Ambassador Program are provided training in how to direct LEP passengers to the nearest Tourist Information Counter for further language assistance.
- f. **Providing Notice of Language Assistance Services:** The Department's website (<http://www.miami-airport.com>) states that language assistance is available at the Tourist Information Counters.
- g. **Monitoring of the LEP Plan:** To assure ongoing effectiveness of our Plan the following areas have been identified as access points for Airport users and visitors. These areas will be continually monitored by the Title VI Coordinator for effectively providing LEP information through the processes established for providing information and by reviewing any gathered data from the identified liaisons as indicated in Section C:
1. **The Terminal Operations Division:** Provides spoken language assistance services at the main information counter at concourse E which includes multi-lingual on-site staff, translator services through a contracted provider and website information translated in several languages through Google Translation services. The Division monitors changes in countries served by airlines to assure LEP needs are met and is required to address all Title VI complaints arising from terminal users.
  2. **Minority Affairs:** Provides outreach meetings and events to advise minority and small business communities of future concession and contracting opportunities at the airport. Provides continual dialogue to minority groups requesting solicitation information. Assures advertisements of business opportunities are in publications targeting minority populations. This division is also responsible for responding to Title VI complaints arising from contractors and concessionaires.

3. **Contracts:** Maintains a transparent and competitive solicitation and award process to assure all interested members of the community have an opportunity to participate. Posts all business opportunities on our airport website, in newspapers of general circulation and publications targeting minority populations. Video records public meetings held to open and evaluate responses from bidders and ranks bidding firms based on qualitative and quantitative measures. Maintains appropriate Title VI nondiscrimination clauses in the boilerplate languages of all construction, concession, lease, professional service and airline use agreements as well as permits. Maintains records supporting all bids solicited and awarded for inspection by the FAA.
4. **Environmental:** Ensures compliance with Executive Order 12898 by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. Compliance is continually reviewed within Environmental Impact Statements and Environmental Assessments.
5. **Planning:** Site selections are not made to exclude individuals from participating in, to deny them the benefits of, or to subject them to discrimination under a program or activity to which this rule applies, on the grounds of race, color or national origin. The Planning Division has developed a Community Participation Plan to further establish the Department's efforts to be inclusive of all airport patrons.

The LEP Plan will be periodically updated to reflect updates in language services, changing technologies and departmental organization. Designation of specific responsibilities are a constant evolution as department staff move on or out of the Department. It is the intention of the Department that the LEP Plan be a constant compliance requirement throughout the various divisions to assure all airport patrons are given full and open access to its services and operations.