

Limited English Proficiency Plan

A. Policy Statement

The Virginia Port Authority (“VPA”) is committed to improving the accessibility of its programs and services to eligible non-English speakers and limited English proficient (“LEP”) persons. VPA has prepared this LEP Plan to reduce barriers and ensure meaningful access to services, programs and activities on the part of LEP persons. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any federally assisted program or activity because they face challenges communicating in English.

B. Purpose and Authority

Discrimination against a person because of their limited ability to use the English language is a form of national origin discrimination and is prohibited by Title VI of the Civil Rights Act of 1964. Executive Order 13166, titled, “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation to ensure discrimination does not occur. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance).

C. Plan Summary

This LEP Plan is to help identify reasonable steps to provide language assistance for persons seeking meaningful access to VPA services as required by Executive Order 13166. This LEP Plan sets forth procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the approach for training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

D. Language Assistance Measures

- a. How Recipients Can Obtain Services
All requests for language services should be made through povcustomerservice@vit.org who will coordinate assistance arrangements.
- b. How to Respond to LEP Callers
VPA personnel, including those who regularly take calls from the general public, will forward LEP calls to the Customer Service representative, who will record the date and time of the call, name of caller, language (if it can be determined), nature of call and disposition. The representative will be responsible for coordinating language services if needed.
- c. How to Respond to Written Communications from LEP Persons

VPA personnel who receive written communications from LEP individuals will contact Customer Service representative who will record the date of receipt, name of LEP individual, language (if it can be determined), nature of the correspondence, and disposition. The representative will be responsible for coordinating language services if needed.

d. How to Respond to LEP Individuals Who Have In-Person Contact with Staff

VPA personnel who have in-person contact with LEP individuals will address the issues and/or concerns. They will record the date of receipt, name of LEP individual, language (if it can be determined through familiarity with the language), nature of the correspondence, and disposition of the encounter and forward the information to the representative. In cases where language barriers cannot be overcome, personnel will contact the representative and the representative will be responsible for coordinating language services if needed.

e. VPA Staff Training

Staff will be provided a copy of the LEP Plan and educated on procedures. Suggested training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities.
- How to locate and use interpretation and translation services if needed.
Documentation of language assistance requests.
- How to handle a Title VI and/or LEP complaint.

f. Monitoring and Updating the LEP Plan

This LEP plan is designed to be flexible and easily updated. VPA will review this LEP Plan on an annual basis to determine if it should be updated. Each LEP Plan review will examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What specific services were provided, if any?
- Has there been a change in the types of languages where translation services are needed?
- Have VPA's available resources, such as technology, staff, and financial costs changed?
- Has VPA fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

g. Dissemination of the VPA Limited English Proficiency Plan

The LEP Plan will be shared with VPA employees. Additionally, VPA will include the LEP Plan on VPA's website (portofvirginia.com) together with its Title IV Policy and Complaint Procedures. Copies of this LEP Plan will be provided upon request. LEP persons may also obtain a translated copy of this document upon request. Any questions or comments regarding this plan should be directed to the VPA Customer Service Representative at the address listed below:

povcustomerservice@vit.org