

October 2, 2018

SUBJECT: REQUEST FOR PROPOSALS FOR INDEFINITE QUANTITY CONTRACTS (IQCs) FOR THE PERFORMANCE OF EXPERT PROFESSIONAL PROJECT MANAGEMENT SERVICES ON AN “AS-NEEDED” BASIS FOR FEDERALLY FUNDED PROJECTS DURING 2018 THROUGH 2022 – RFP NO. 54313 – ADDENDUM # 4

Dear Sir or Madam,

The Port Authority of New York and New Jersey (the Authority) hereby amends the subject Request for Proposals (RFP), dated August 23, 2018, as follows:

1) Add the Authorities Limited English Proficiency (LEP) Plan 2015 (Attachment A1) to the RFP Solicitation Document.

If you have any questions, please contact Mr. Thomas Lal, Sr. Contract Specialist, at TLAL@panynj.gov

Sincerely,

Joann Spirito
Manager, Federal Procurement & Compliance
Procurement Department

ATTACHMENT A1

AUTHORITY'S LIMITED ENGLISH PROFICIENCY (LEP) PLAN

2015

Limited English Proficiency (LEP) Plan



Submitted by: The Port Authority of New York
and New Jersey

Government and Community Relations

4/1/2015

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INTRODUCTION

The Port Authority of New York and New Jersey's (Port Authority) Government & Community Relations Department (GOCOR) and Office of Business Diversity and Civil Rights (OBDCR) collaborated to develop this Limited English Proficiency (LEP) Plan. The LEP Plan provides Port Authority staff with guidance to effectively apply LEP requirements and ensure nondiscrimination in the delivery of our programs.

To support its development and ensure consistency with the United States Department of Transportation (DOT) implementing guidance, this LEP Plan, which consists of a four-factor analysis and corresponding language assistance services, describes the needs and use of LEP services. Each Port Authority operating department (Aviation, Port Commerce, Port Authority Trans-Hudson Corporation, Tunnels, Bridges and Terminals Departments) assessed its customer demographics and services to determine its department's customer needs and its LEP responsibilities. The findings were used to compile the information contained in this Plan and are meant to be used as a guide to assist future LEP efforts.

LEP OVERVIEW

As a recipient of Federal Transit Administration (FTA), Federal Highway Administration (FHWA), and Federal Aviation Administration (FAA) funding, the Port Authority, which includes its wholly owned subsidiary, the Port Authority Trans-Hudson Corporation (PATH), takes reasonable steps to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d *et seq.* and its implementing regulations provide, among other things, that no person 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. The Civil Rights Restoration Act of 1987 provided an interpretation of "program and activity" and defined it as all the operations of a department, agency etc. Furthermore, the Supreme Court, in *Lau v. Nichols* 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

On August 11, 2000, President Clinton issued Executive Order 13166, entitled "Improving Access to Services for Persons with Limited English Proficiency." Executive Order 13166, reprinted at 65 FR 50123 (August 16, 2000), directs each federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order, in the Federal Register/Vol. 65, No. 159 (2000), states that "*Agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.*"

The U.S. Department of Transportation (DOT) published its *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons* in Federal Register/Vol. 70, No. 239, pp. 74087-74100, December 14, 2005 (DOT LEP Guidance). The FTA also published additional LEP guidance in its Circular 4702.1B *Title VI Requirements*

and Guidelines for Federal Transit Administration Recipients. Each of the guidance resources noted above requires recipients to develop an LEP Plan consistent with the provisions of Section VII of the DOT LEP Guidance.

DOT LEP Guidance Section IV in part states *“Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient.”* Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, or understanding other information provided by federally funded activities and programs.

LEP ANALYSIS GUIDANCE

To determine the most effective mix of language assistance and to target resources appropriately, each department that provides transit service to the public must periodically conduct a four-factor analysis to confirm that its current practices are in line with the needs of persons with LEP.

The four-factor analysis involves four steps:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient.
2. The frequency with which LEP individuals come in contact with the program, activity, or service.
3. The nature and importance of the program, activity, or service provided by the recipients to people’s lives.
4. The resources available to the recipient and their costs.

Factor 1: Assess the number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service.

DOT LEP Guidance Section V (1), states in part that *“The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed. Ordinarily, persons’ eligible to be served or likely to be directly affected by a recipient’s programs or activities are those who are in fact, served or encountered in the eligible service population. This population will be program-specific, and includes persons who are in the geographic area that is part of the recipient’s service area.”*

Best practices include:

- Examine Port Authority’s prior experiences with LEP individuals.
- Examine the Port Authority’s Planning and Regional Development Department’s Regional Demographics on enet. This internal resource on the Planning Department’s internal website provides demographic information on the pertinent areas relative to Port Authority facilities.
- If need be, further examine Census/American Community Survey (ACS) data.
- Consult local organizations, community organizations, local governments, and religious organizations.

Factor 2: Assess the frequency with which LEP individuals come in contact with the program, activity, or service.

DOT LEP Guidance, Section V (2), states in part that *“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services*

will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that services LEP persons daily.”

Best practices include:

- Survey or other critical user information gathered.
- Telephone data – Incoming Calls – Customer Service Line usage (for example, how many callers select Spanish). What other languages should be included?
- Website statistics – Where bilingual information is present, how many times was it viewed?
- Collect Customer Service Agents and staff feedback.
- Assess LanguageLine details.
- Assess Survey results.
- Review Customer Service LEP assistance requested and provided.

Factor 3: Assess the nature and importance of the program, activity, or service provided by the agency.

DOT LEP Guidance Section V (3) states that *“The more important the activity, information, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed.”*

Furthermore, DOT LEP Guidance Section V (4) states in part, *“Providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.”*

Best practices include:

- Ask yourself – What is **vital** to LEP persons to access available services?
- Identify vital documents for written translation. Whether or not a document is vital depends on the importance of the program, information, or services involved and the consequence to the LEP person if the information in question is not accurate or timely.

Vital documents may include: intake forms; applications to participate; customer service; complaint forms; permits; tickets of deficiency notices; emergency transportation information; signs in bus and train stations and airports, notices of public hearings or meetings regarding recipients proposed transportation plans, projects, or changes, and reduction, denial or termination of services or benefits; signs in waiting rooms, reception areas or other initial points of entry; notices advising LEP persons of free language assistance or statements about services and the right to free language assistance in appropriate non-English brochures, booklets, outreach and recruitment information; and other materials routinely disseminated to the public.

LEP.gov notes, “For larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety.”

Factor 4: Assess the resources available to the recipients and the costs.

DOT LEP Guidance Section V (4) states, *“Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.”*

“The following practices may reduce resources and cost issues where appropriate: training bilingual staff to act as interpreters and translators, information sharing through industry groups, telephonic and video conferencing interpretation services, translating vital documents posted on Web sites, pooling resources and standardizing documents to reduce translation needs and using qualified translators and interpreters to ensure that documents need not be ‘fixed’ later and that inaccurate interpretations do not cause delay or other costs, centralizing interpreter and translator services to achieve economies of scale, and a formalized use of qualified community volunteers.”

“The correct mix should be based on what is both necessary and reasonable in light of the four factor analysis.”

Best practices include:

- Outline resources available to provide language assistance and overall costs of providing LEP assistance as identified in the four-factor analysis.
- Utilize the Internal Port Authority Order Number 061214 for expenses related to the Title VI Nondiscrimination Program.
- When appropriate, utilize staff across the agency with language skills to supplement our language services at the first point of contact with an LEP individual or group.

SELECTING LANGUAGE ASSISTANCE SERVICES

Recipients may provide language services in either oral or written form. Quality and accuracy of language services is critical.

ORAL LANGUAGE SERVICES (INTERPRETATION)

Interpretation is the act of listening in one language and orally translating it into another language. It is imperative to rely on competent interpreters who have demonstrated their proficiency in the ability to communicate information accurately in English and another language. Interpreters must adhere to their role without deviating into a role as counselor, legal advisor, or other role. When language assistance is needed and is reasonable, it should be provided in a timely manner. Timely means providing assistance at a time and place that avoids the denial of a service or benefit of a program or activity. Options to satisfy this need include hiring or employing bilingual staff at locations where language assistance needs are most often encountered, hiring staff interpreters, contracting for interpreters, using telephone interpreter lines, or using community volunteers where appropriate.

WRITTEN LANGUAGE SERVICES (TRANSLATION)

Translation is the replacement of a written text from one language into an equivalent written text in another language. Translators should understand the expected reading level of the audience and, where appropriate, have fundamental knowledge of the target language group’s vocabulary and phraseology.

What to translate? Examples of materials that may be translated include:

- Emergency transportation information.
- Marking, signs, and packaging for hazardous materials and substances.
- Signs in bus and train stations and in airports.
- Notices of public hearings regarding the Port Authority's (including PATH's) proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits.
- Signs in waiting rooms, reception areas, and other initial points of entry.
- Notices advising LEP persons of free language assistance and language identification cards for staff.
- Applications or instructions on how to participate in Port Authority and PATH programs.
- Complaint and consent forms.

Whether or not a document or the information it solicits is "vital" may depend upon the importance of the program, information, or services involved and the consequence to the LEP person if the information in question is not accurate or timely.

Community organizations may help determine what outreach materials are most helpful if translated. Ethnic media, schools, and religious and community organizations may also assist in communicating messages.

SAFE HARBOR PROVISION

Safe Harbor provisions apply to the translation of written documents only. The DOT considers the following as evidence that the recipient has met its obligation.

1. The recipient provides written language translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected by service changes or facility activities; and
2. If there are fewer than 50 persons in a language group that reaches the 5% trigger in 1 above, the recipient does not have to translate vital written materials but must provide notice of the right to receive competent oral interpretation of those written materials, free of costs.

Based on the populations living in proximity to Port Authority facilities and who most frequently utilize the Port Authority's vast network of aviation and maritime facilities, and transportation terminals and services, vital documents are initially considered for translation into Spanish and Chinese. Further, given limitations on the agency's resources and that those populations who most often encounter our facilities and utilize our services fall within the aforementioned LEP populations, we do all possible to ensure that these limited resources are fairly allocated where they are likely to provide the most benefit.

Nonetheless, the Port Authority recognizes the presence of languages other than Spanish and Chinese within the service area that fall under the Safe Harbor provision and as such, regularly assesses LEP needs on a project-by-project basis, utilizing demographic analysis gathered from Census bureau statistics. In addition, Port Authority liaisons from the Government & Community Relations department maintain regular communication with local elected officials and community leaders to ensure the needs of impacted, harder to identify, LEP populations are

considered. The Agency makes a concerted effort, leveraging its finite resources, to address individual requests for the translation of vital documents into languages other than Spanish and Chinese, within a reasonable timeframe.

LANGUAGE ASSISTANCE PLAN

The Port Authority of New York and New Jersey's Language Assistance (LEP) Plan summarizes how the Port Authority addresses the identified needs of the Limited English Proficient populations within the region it serves (Port District).

The Port Authority of New York and New Jersey's Aviation, Tunnels, Bridges and Terminals, Rail Transportation (PATH), and Port Commerce operating departments have a strong understanding of their LEP customer base. Aviation serves an international and diverse regional population. PATH primarily serves residents in local neighboring communities and commuters transferring to PATH stations from other communities within the Northern New Jersey-New York region. The Tunnels, Bridges and Terminals Department (TB&T) serves motorists travelling between New York City and New Jersey utilizing vehicular tunnels and bridges, as well as bus riders to two interstate bus terminals, which serve both local and long-distance travelers. Port Commerce does not provide public transportation; rather, it interfaces with the truck driving population serving marine terminal operators.

In addition to the aforementioned departments, the Port Authority's Office of Government and Community Relations serves as a valuable resource for elected officials, residents, and community organizations and has dedicated staff that liaises between operating departments and the communities to regularly assess their needs. As such, the Port Authority takes an active role in the communities it serves and forges strong relationships with federal, state, and local government officials as well as among community groups and leaders to help ensure that the needs of the LEP population are effectively addressed.

Overall, based on Census data, surveys, and historical information, the most commonly spoken LEP language in the Port Authority service area and at transportation facilities is overwhelmingly Spanish, followed by Chinese at a distant second. Recognizing that these languages can vary based on a project area, as matters of practice, needs are regularly assessed and an outreach strategy is defined on a project-by-project basis. Once a project area has been established, should additional demographic data analysis indicate that the impacted population includes other LEP populations, efforts will be made to provide outreach to those specific LEP populations accordingly.

RESULTS OF THE FOUR-FACTOR ANALYSIS

Factor 1 Results:

Assess the number and proportion of LEP persons served or encountered in the eligible service population

The Port Authority's eighteen (18)-county service area within the States of New York and New Jersey include New York, Kings, Queens, Richmond, Bronx, Rockland, Suffolk, Nassau, and Westchester Counties in New York and Bergen, Essex, Hudson, Middlesex, Monmouth, Morris, Passaic, Somerset, and Union Counties in New Jersey. A separate analysis was conducted of the three-county area in which our PATH rail transit service operates and in which the PATH stations are located: New York County in New York and Essex and Hudson Counties in New Jersey.

County-level data is derived from the U.S. Census Bureau's American Community Survey, 2008-2012 5-Year Estimates, Tables S1601 and B16001, "Language Spoken at Home" and "Language Spoken at Home by Ability to Speak English" for the population age five years and over. Data presented displays all languages reported, is an

indication of those within the population age five and over, and identifies those who speak a language other than English and those who speak English less than very well. Those populations are displayed as “Limited English Proficiency” populations.

In accordance with the Department of Justice (DOJ), Safe Harbor provision, a minimum of 1,000 persons, or 5% of the geography’s population were used to determine those languages that met the threshold for translation of vital documents.

Port Authority Service Area LEP Table

| PA Service Area | | | | | |
|---------------------------------|-----------|-------|-------------------------------|----------|-------|
| Total Population | | | 16,555,189 | | |
| Total LEP Population | | | 3,045,624 | | |
| Total LEP Percent | | | 18.4% | | |
| Language | LEP Pop. | % LEP | Language | LEP Pop. | % LEP |
| Spanish or Spanish Creole | 1,623,514 | 9.66% | Japanese | 20,013 | 0.12% |
| Chinese | 352,332 | 2.10% | Other Slavic | 15,820 | 0.09% |
| Russian | 137,986 | 0.82% | Hebrew | 14,329 | 0.09% |
| Korean | 95,173 | 0.57% | Vietnamese | 12,949 | 0.08% |
| French Creole | 78,954 | 0.47% | Persian | 12,213 | 0.07% |
| Other Indic | 78,641 | 0.47% | Serbo-Croatian | 11,297 | 0.07% |
| Italian | 74,051 | 0.44% | German | 8,547 | 0.05% |
| Polish | 60,769 | 0.36% | Hungarian | 5,546 | 0.03% |
| Portuguese or Portuguese Creole | 51,190 | 0.30% | Other Pacific Island | 5,184 | 0.03% |
| Arabic | 46,416 | 0.28% | Thai | 4,823 | 0.03% |
| Other Asian | 42,695 | 0.25% | Other and Unspecified | 3,990 | 0.02% |
| Yiddish | 39,565 | 0.24% | Armenian | 3,579 | 0.02% |
| Tagalong | 38,140 | 0.23% | Mon-Khmer, Cambodian | 1,315 | 0.01% |
| French (incl. Patois, Cajun) | 34,770 | 0.21% | Scandinavian | 1,274 | 0.01% |
| Gujarati | 30,170 | 0.18% | Other West Germanic Languages | 1,114 | 0.01% |
| African languages | 29,988 | 0.18% | | | |
| Other Indo European | 29,656 | 0.18% | Other Native North American | 471 | 0.00% |
| Urdu | 29,582 | 0.18% | Laotian | 251 | 0.00% |
| Hindi | 25,939 | 0.15% | Hmong | 27 | 0.00% |
| Greek | 23,592 | 0.14% | Navajo | 10 | 0.00% |

Source: U.S. Census Bureau, American Community Survey 2008-2012 5 Year Estimates, Table B16001.
 Languages under white field met the Limited English Proficiency population threshold.

Path Service Area LEP Table

| PATH Service Area | | | | | |
|---------------------------------|----------|--------|-------------------------------|----------|-------|
| Total Population | | | 2,596,368 | | |
| Total LEP Population | | | 509,760 | | |
| Total LEP Percent | | | 19.6% | | |
| Language | LEP Pop. | % LEP | Language | LEP Pop. | % LEP |
| Spanish or Spanish Creole | 327,053 | 11.51% | German | 1,494 | 0.05% |
| Chinese | 55,539 | 1.95% | Other Slavic | 1,424 | 0.05% |
| Portuguese or Portuguese Creole | 19,088 | 0.67% | Greek | 1,326 | 0.05% |
| French Creole | 11,556 | 0.41% | Hebrew | 1,205 | 0.04% |
| French (incl. Patois, Cajun) | 10,074 | 0.35% | Serbo-Croatian | 1,136 | 0.04% |
| Arabic | 8,390 | 0.30% | Persian | 1,025 | 0.04% |
| Tagalog | 7,608 | 0.27% | | | |
| Korean | 6,727 | 0.24% | Thai | 542 | 0.02% |
| Japanese | 6,568 | 0.23% | Hungarian | 529 | 0.02% |
| African languages | 6,135 | 0.22% | Other Pacific Island | 487 | 0.02% |
| Russian | 6,060 | 0.21% | Other and Unspecified | 470 | 0.02% |
| Italian | 5,952 | 0.21% | Armenian | 428 | 0.02% |
| Gujarati | 4,805 | 0.17% | Scandinavian | 297 | 0.01% |
| Polish | 4,769 | 0.17% | Other West Germanic Languages | 265 | 0.01% |
| Hindi | 4,603 | 0.16% | Yiddish | 190 | 0.01% |
| Other Indic | 3,812 | 0.13% | Other Native North American | 155 | 0.01% |
| Other Asian | 3,405 | 0.12% | Mon-Khmer, Cambodian | 68 | 0.00% |
| Urdu | 2,473 | 0.09% | Hmong | - | - |
| Other Indo European | 2,107 | 0.07% | Laotian | - | - |
| Vietnamese | 1,995 | 0.07% | Navajo | - | - |

Source: U.S. Census Bureau, American Community Survey 2008-2012 5 Year Estimates, Table B16001.
 Languages under white field met the Limited English Proficiency population threshold.

The data analysis, depicted in the above tables concludes that the Port Authority Service and PATH Service Area’s regional average of the LEP population is 18.4% and 19.6% respectively. Of this percentage, Spanish or Spanish Creole is overwhelmingly the most dominant LEP language spoken and utilized within the service areas, accounting for 9.66% and 11.51 % of the population respectively. By contrast, the second most commonly spoken LEP language, Chinese, constitutes just 2.10% and 1.95% of the PA and PATH service area populations respectively.

Though demographic analysis indicates that many other languages that fall within the Safe Harbor provision are spoken within the designated service areas, additional research concludes that these LEP populations are encountered or utilize Port Authority services with far less frequency in comparison to the aforementioned languages. Recognizing the presence of other languages in our service area as well as the fact that data is not static and populations change, we maintain close contact with community leaders and conduct regular demographic assessments to ensure that LEP populations affected by a project are aware of the information available to them, and we always strive to ensure that LEP services are provided when necessary.

Factor 2 Results:

Assess the frequency with which LEP individuals come in contact with the program, activity, or service.

Most often, to aid in the determination of the frequency of LEP contacts with Port Authority facilities, customer service surveys, interviews with field personnel and office staff, and review of past language assistance statistics, in addition to regional and service area demographic information, are utilized.

Additionally, individual departments conducted research and regularly collect data. For example, the Aviation Department determined language assistance needs based on the top 27 most spoken languages internationally. This list remains relatively stable and, typically, languages added are not removed. Terminal by Terminal Customer Satisfaction Surveys, conducted by the Aviation Department, were another useful tool to determine eligible LEPs to

be served. Approximately 10,000 arriving and departing passengers were annually canvassed and most recently the questionnaires were provided in English, Spanish, French, German*, Italian, Japanese, Mandarin, and Korean* languages (*added in 2014). The selected languages were based on the languages spoken by a proportion of annual passengers flying on a carrier and the additional development cost to accommodate the foreign language given the proportion of potential users – noting that only a small proportion of our passengers (5% across the region) may have difficulty with English and use the foreign-language survey. Introductory show cards were also presented to prospective respondents and some foreign-language speaking interviews were conducted to help with language barriers. The Rail Transportation Department (PATH) also utilized surveys to garner LEP information in addition to Census data. An Origin and Destination (O&D) Survey (last conducted in 2012) was used to determine the most frequently used languages for LEP individuals. The eligible service population was based on a combination of Census Tract-level data for customers within a one-mile walking distance from each station and county-level census data for customers who make up more than 10% of a given transit mode to access PATH. The results, which mirror the demographic data for the service area, indicate that the highest percentages of individuals with limited English proficiency speak Spanish, followed by Chinese in a distant second.

Factor 3 Results:

Assess the nature and importance of the program, activity, or service provided by the program.

The nature and importance of Port Authority programs, activities, and services to LEP customers generally mirror the nature and importance of programs, activities, and services to all of our customers. The Port Authority recognizes that public transportation plays a critical role in an individual's ability to access employment, education, and health care. Although the most frequently encountered LEP populations speak Spanish and Chinese, reasonable accommodations are made to provide notice and outreach to other LEP populations who utilize our services.

Factor 4 Results:

Assess the resources available to the recipients and costs.

Port Authority operating departments will continue to use a diverse mix of language assistance and outreach methods to ensure that LEP persons have equal access to programs and services. Expenditures related to providing language assistance have not been tracked separately as they are included in a project's overall outreach budget. Examples of expenditures include translated documents, website pages, brochures and oral interpretation services, customer service agent training program development, new hire training, and refresher courses.

LANGUAGE ASSISTANCE SERVICES

The diverse customers who utilize the public transportation services provided by the Port Authority often require language assistance services. The current best practices for oral and written language assistance services used by the Port Authority, but not used by every operating department, include:

WRITTEN LANGUAGE SERVICES (TRANSLATION)

In the event a respective Port Authority department receives correspondence in a foreign language, the departments will, when applicable, utilize bilingual staff fluent in the language in which the request was received to translate the letter and transcribe a response back to the recipient in the same language. Further, in the absence of a suitable resource available in-house, agency staff, via the Marketing Department, work with a select list of vendors to identify the appropriate translation service as needed. Currently, the Port Authority maintains a list of Minority and Women's Business Enterprise-certified firms who provide translation services. Additionally, we are exploring the establishment of contractual agreements for translation services utilized by other state government agencies.

ORAL LANGUAGE SERVICES (INTERPRETATION)

Oral interpretation services are provided free of charge. For example, the Aviation Department Customer Care Representatives, the first line of assistance for airport patrons, speak over 27 languages and have the ability to utilize LanguageLine translation telephone services, providing assistance in almost all languages 24 hours a day. Interpreter services may also include airline staff, who usually speak the language of the home base of the carrier. For instance, staff from Lufthansa speak German; staff from El Al speak Yiddish. Additionally, our airports have a very diverse employee base who speak many languages, including sign language, Russian, Hindi, Korean, Japanese, Mandarin, French, Spanish, Yoruba, and more. Our employees also speak dialects of these languages, such as Creole, Cantonese, Dogri, and Khoe, depending on their home country.

Similarly, other Port Authority operating departments also offer a LanguageLine translation service at select facilities. PATH maintains a toll-free customer information telephone line that prompts callers to select their preferred language. TB&T specifically offers this service at its interstate bus terminal facilities: the Port Authority Bus Terminal (PABT) and the George Washington Bridge Bus Station (GWBBS).

Other verbal assistance and interpretation services specifically applicable to the below referenced departments include:

Port Commerce provides assistance at its trucker registration office in Spanish and Polish, the primary languages spoken by the truck driving community.

TB&T utilizes bilingual staff at the PABT and GWBBS and tollhouses to provide customer assistance and also has Spanish-speaking customer service representatives available on the E-Z Pass New York Customer Service Center telephone information line scheduled during regular operating hours. (Monday through Friday, 7 am to 7 pm and Saturdays, 8 am to 2 pm). Additionally, the Port Authority Bus Terminal offers automated telephone information via a toll-free number with an interactive voice response (IVR) system in English, with Spanish-speaking representatives available during normal operating hours (Monday through Friday, 7 am to 7 pm and Saturdays, 8 am to 2 pm). At all other times, the E-Z Pass New York telephone information line has IVR capability in English and Spanish.

INTERPRETATION SERVICES

The use of interpretation services is project specific, determined by the designated project area and affected community/populations. Translators are available upon request at public meetings, based on the LEP needs of that project and community. GOCOR advises the community of the availability of these services, in advance of scheduled public hearings, via print media and through the Government Relations liaison's regular communication with the respective elected officials and community group leaders of the impacted areas. These community leaders serve as key resources to supplement the statistical information obtained from Census research and the Planning Department in order to identify LEP populations and their needs.

PROVIDING NOTICE TO LEP PERSONS

Notices of nondiscrimination are posted in Spanish and Chinese at locations where people would sensibly seek information, such as information booths and nearby ticket vending machines, or other heavily trafficked areas of facilities.

Signs indicating LanguageLine translation services are posted.

During the planning stages of a project, notification is provided to local residents and businesses of the impacted service area. The methodology of notification varies based upon the size and scope of a project and includes everything from print advertisements in a range of print media outlets in appropriate languages (as determined by the population of the project area) to posters and flyers distributed door to door within the impacted communities. The procedures for requesting a free interpreter are outlined in outreach information. GOCOR also maintains communication with individuals who are active members of their community – not necessarily elected officials – to extend its efforts to identify small or difficult to reach LEP populations. Port Authority staff clarifies that if there are any questions or special accommodations necessary, the Port Authority is willing to address these concerns and provide reasonable accommodations as is feasible.

MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

GOCOR regularly monitors LEP services provided from reports submitted to OBDCR from operating departments. The Language Assistance Plan will be updated as internal processes develop or change in order to keep pace with best practices.