

# ***CIVIL RIGHTS POLICY AND PROCEDURES***



Adopted November 17, 2021

By Resolution 1121108

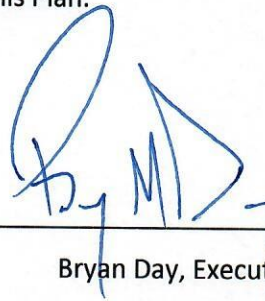
This document is intended to replace the Title VI/LEP Plan passed by the Little Rock Port Authority Board in 2017, with a more comprehensive document encompassing all federal civil rights provisions, and meeting the intent of the City of Little Rock Civil Rights Ordinance No. 21,031, which requires that the Port:

does not discriminate in any of its activities, whether federally funded or not, on the basis of race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, political opinions or affiliation.

The Little Rock Port Authority values diversity and welcomes input from all interested parties, regardless of cultural identity, background or income level. Moreover, the Little Rock Port Authority believes that the best services result from careful consideration of the needs of all its communities. Therefore, the Little Rock Port Authority does not tolerate discrimination in any of its programs, services or activities. The Little Rock Port Authority further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether or not those programs and activities are federally funded.

The Little Rock Port Authority is committed to ensuring that no person is excluded from participation in, denied the benefits of, denied employment, or subjected to discrimination in any program, activity, or service that it provides. The Little Rock Port Authority will not tolerate intimidation, threats, coercion, or discrimination against any individual or group. This policy establishes a framework for taking reasonable steps to ensure access to all services provided by the Little Rock Port Authority for all citizens employees, and customers, and establishes procedures whereby the Little Rock Port Authority will receive and investigate allegations of discrimination.

The Executive Director is responsible for ensuring implementation of the Little Rock Port Authority Civil Rights Compliance Plan. The Civil Rights Coordinator, under supervision of the Executive Director, is responsible for coordinating the overall administration of this Plan.

A handwritten signature in blue ink, appearing to read "Bryan Day", is written over a horizontal line.

Bryan Day, Executive Director  
Little Rock Port Authority

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## Little Rock Port Authority Civil Rights Policy and Procedures

### I. Introduction

This plan is part of the continual and ongoing efforts of the Little Rock Port Authority (LRPA) to comply with civil rights laws and regulations. The intent of the LRPA is to proactively meet and in some instances exceed minimum compliance requirements established under Title VI of the Civil Rights Act of 1964 (Title VI), 49 CFR § 26, and the related anti-discrimination statutes and regulations, specifically Title IX of the Education Amendments of 1972 which prohibits discrimination on the basis of sex in any education or training program; Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of an individual's disability; and the Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age, U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs, and related statutes and regulations.

With this document, LRPA strives to provide transparency, clarity, and technical guidance for internal and external constituents regarding its Civil Rights program.

### II. Civil Rights and Non-Discrimination Statement

The Little Rock Port Authority will implement compliance with Title VI 49 CFR § 26; as amended, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, as amended, U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs, and related statutes and regulations to ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in employment or under any program or activity on the grounds of race, color, disability, sex, age, religion, or national origin. LRPA values the civil rights of all individuals and wishes to provide equal opportunity and equitable service to all.

The Little Rock Port Authority will conform to Title VI and all related statutes, regulations, and executive orders which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity on the grounds of race, color, disability, sex, age, religion, or national origin.

Additionally, the Little Rock Port Authority, as an instrumentality of the City of Little Rock is governed by the City of Little Rock Civil Rights Ordinance No. 21,031 (Appendix A). As a result, the following non-discrimination statement will govern all activities of the Little Rock Port Authority:

#### **Notice of Nondiscrimination**

The Little Rock Port Authority complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance, including Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975 and U.S. Department of Homeland Security regulation 6 C.F.R. Part 19. Furthermore, the Little Rock Port Authority complies with the City of Little Rock Civil Rights Ordinance. Therefore, the Little Rock Port Authority does not discriminate, in any of its activities, whether federally funded or not, on the basis of

race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, political opinions or affiliation.

LRPA will take reasonable measures to provide access to LRPA services to individuals with limited ability to speak, write or understand English and/or to those with disabilities.<sup>1</sup>

Complaints of alleged discrimination and inquiries regarding the nondiscrimination policies of the Little Rock Port Authority may be addressed to: Jean Pulliam, Civil Rights Coordinator, 10600 Industrial Harbor Drive, Little Rock, AR 72206, [jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com) or telephone (501) 490-1468. Hearing and speech impaired may dial 711. This notice is available from the Civil Rights Coordinator in large print, or on audiotape.

The Little Rock Port Authority will not tolerate intimidation, threats, coercion, or discrimination against any individual or group for the purpose of interfering with any right or privilege guaranteed under law or regulations, or because the individual has filed a complaint or has testified, assisted, or participated in any way in an investigation, proceeding, or hearing or has opposed any LRPA action or decision.

#### List of Locations Where Civil Rights Notice Is Placed:

- Little Rock Port Authority Offices: Break Room, Finance Manager's Office, Railyard Office
- Little Rock Port Authority website
- All Little Rock Port Authority publications

### III. ADA/504 Statement

Section 504 of the Rehabilitation Act of 1973 (Section 503), the Americans with Disabilities Act of 1990 (ADA), the Americans with Disabilities Amendments Act of 2008 (ADAAA), and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate persons with disabilities and to ensure that their needs are equitably represented in transportation programs, services and activities.

It is the policy of the Little Rock Port Authority to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. Additionally, it is the policy of the LRPA to ensure that its advisory committees, public involvement activities and all other programs, services, and activities include representation by persons with disabilities and disability service groups. The Port's ADA Accommodation Notice is found in Appendix I; it will be posted on the Little Rock Port Authority website.

Questions, concerns, comments, or requests for accommodation should be made to the Little Rock Port Authority ADA Officer:

Jean Pulliam, Civil Rights Coordinator  
10600 Industrial Harbor Drive  
Little Rock, AR 72206,  
[jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com)

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<sup>1</sup> A more complete description of these actions is found in Sections III and VIII.

(501) 490-1468

Hearing and speech impaired may dial 711.

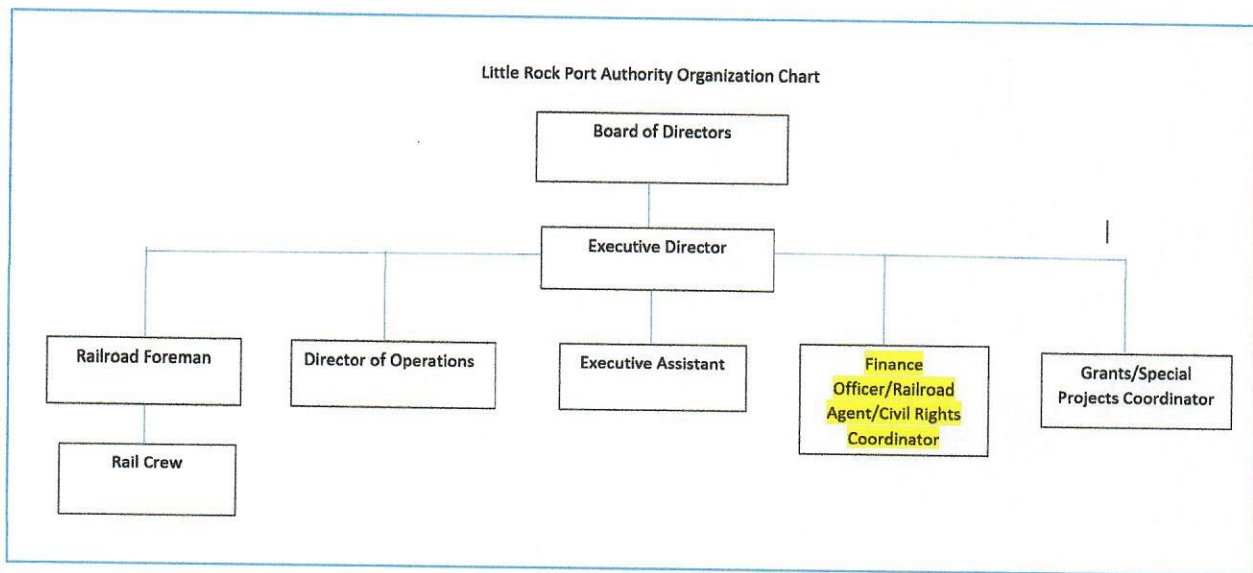
#### IV. Civil Rights Compliance Responsibilities

##### Staffing

The Civil Rights Coordinator, under supervision of the Executive Director, is responsible for ensuring that the Little Rock Port Authority complies with all Civil Rights regulations and directives. Responsibilities include, but are not limited to:

- Continuous monitoring of LRPA activities to ensure compliance with Civil Rights regulations and resolution of any noncompliance occurrences
- Continuous monitoring of LRPA activities to ensure compliance with ADA/Section 504 regulations and resolution of any noncompliance occurrences
- Continuous monitoring of LRPA activities to ensure compliance with Title IX of the Education Amendments of 1972
- Continuous monitoring of LRPA activities to ensure compliance with the Age Discrimination Act of 1975
- Continuous monitoring of LRPA activities to ensure compliance with the U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs
- Review and update of the LRPA Civil Rights Policy and Procedures as needed
- Dissemination of information related to the Civil Rights Policy and Procedures
- Investigation and resolution of Civil Rights complaints;
- Preparation of annual report and other required reports
- Delivery of/coordination of training for staff members and sub-recipients

The Coordinator may be advised, as needed, by representatives from the City of Little Rock, Metroplan (the metropolitan planning organization for Central Arkansas), or the Arkansas State Highway and Transportation Department, all of which have Civil Rights programs, as well as federal program staff.



### Training

The Civil Rights Coordinator will provide for annual training for staff, subcontractors, and sub-recipients of federal funding. This training includes, but is not limited to, communicating the LRPA's Civil Rights policy to staff, subcontractors and sub-recipients through training, seminars, one-on-one counseling, and dissemination of Civil Rights materials.

### Review

The Little Rock Port Authority was organized in 1959 to oversee the Port of Little Rock and provide intermodal transportation services connecting U.S. markets and the deep-water ports of the Gulf of Mexico. Normal program activities include the operation of a railroad, operation of docks that service barges on the Arkansas river, lease, sale and purchase of properties in the Port Industrial Park, economic development and marketing to industries that utilize the Port, construction of new facilities and rehabilitation of existing facilities. Typical activities covered under Civil Rights policies would include hiring/firing employees, and execution of a variety of contracts that support normal operations.

In January of each year, the Civil Rights Coordinator will provide an annual report that details accomplishments and challenges encountered in the implementation of the Civil Rights plan, including those relating to various subcontractors and sub-recipients of federal funding during the previous year.

## V. Filing a Civil Rights Discrimination Complaint

Any person who believes that he or she has been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Little Rock Port Authority service, program, or activity whether federally funded or not, based on their race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, political opinions or affiliation may file a complaint. A complainant's representative may also file a complaint on the behalf of such a person.

The following procedures explain how a complaint may be filed:

## Complaints

A complaint should be filed in writing within 180 days of the occurrence of alleged discrimination. If possible, the complaint should be filed on the Complaint Form (Appendix B) and should contain the identity of the complainant, the basis for the complaint (that is, discrimination based on race, color, national origin, sex, religion, age, etc.), and a description of how the alleged discrimination took place, along with the date(s) on which the discrimination took place. A complaint form (Appendix B) may be obtained from the Little Rock Port Authority website, from the Little Rock Port Authority office, by fax, or by email.

If the complaint cannot be submitted in writing, the complainant should contact the Civil Rights Coordinator for assistance in using an alternative format:

Jean Pulliam, Civil Rights Coordinator  
10600 Industrial Harbor Drive  
Little Rock, AR 72206,  
jpulliam@portoflittlerock.com  
(501) 490-1468

A complaint form (Appendix B) may be obtained from the Little Rock Port Authority website, from the Little Rock Port Authority office, by fax or by email. The LRPA will not respond to complaints without the complainant's name and mailing address. The complainant may include additional information or material as an attachment with the submission. The Civil Rights Coordinator may follow up with additional questions, as necessary. Questions regarding the complaint or completing the form should be addressed to the Civil Rights Coordinator. Complaints may be submitted in person, by fax, email, or by mail. Follow up investigation may require an in-person visit.

Complaints may also be sent to the U.S. Department of Homeland Security, Office for Civil Rights and Civil Liberties at:

Email: [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit complaint)

U.S. Department of Homeland Security  
Office for Civil Rights and Civil Liberties  
Compliance Branch  
245 Murray Lane, SW  
Building 410, Mail Stop #0190  
Washington, D.C. 20528

## Acknowledgement

Within three business days upon receipt of a complaint, a letter or card will be mailed to the complainant with the following information: (1) acknowledgement that the complaint has been received and is pending investigation; and (2) estimated date by which a response will be sent to the complainant.

## Investigation and resolution of complaint

The Civil Rights Coordinator will investigate the complaint and respond in writing within a reasonable time, not to exceed 30 days from the receipt of the complaint. The response will provide information concerning resolution of the complaint and/or will make any necessary recommendations or appropriate remedial action.

A record of all Civil Rights complaints and investigations will be maintained by the Little Rock Port Authority for a minimum of five (5) years. Each record will include the name and address of the complainant, nature of the complaint, problems identified, resolution of the complaint and any resulting modifications made to an activity of the Little Rock Port Authority.

The Little Rock Port Authority will take reasonable steps to ensure assistance to complainants with disabilities or with limited English Proficiency, including provision at no cost of appropriate auxiliary aids and services, qualified interpreters to LEP persons, to persons with disabilities who are deaf or heard of hearing, and other individuals as necessary to ensure effective communication.

#### Confidentiality

In accordance with DOT Order 1000.12, the Little Rock Port Authority shall keep the identity of complainants confidential except to the extent necessary for carrying out an investigation and except where disclosure is required by law. If an investigator determines that it is necessary to disclose the complainant's identity to the responder or a third party, the investigator must first obtain complainant's written permission, unless required by law.

#### No Retaliation

The Little Rock Port Authority will not tolerate intimidation, threats, coercion, or discrimination against any individual or group for the purpose of interfering with any right or privilege guaranteed under law or regulations, or because the individual has filed a complaint or has testified, assisted, or participated in any way in an investigation, proceeding, or hearing or has opposed any LRPA action or decision. Any individual alleging such harassment or intimidation may file a separate complaint with the appropriate agency federal civil rights office.

### VI. Civil Rights Investigations, Complaints or Lawsuits

No complaints or lawsuits have been filed against the Little Rock Port Authority to date.

### VII. Environmental Justice, Public Participation and Data Collection

Environmental Justice is the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws and policies.

[Executive Order 12898](#) directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law. As a recipient of federal funding, the Little Rock Port Authority complies with the federal government's Environmental Justice policy.

To help ensure the fair distribution of the benefits and burdens associated with LRPA programs and activities, LRPA is guided by the following Environmental Justice principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Environmental Justice issues regarding planning, ROW/property acquisition, project development, contracting, advertising of projects, and construction management, and other such activities, will be considered. Appendix D details the process by which Environmental Justice issues will be considered and mitigated where possible.

To help ensure Environmental Justice, the Little Rock Port Authority will include people of all races, cultures and incomes in its planning processes, providing for:

- Proactive notice of planning activities
- Complete information about plans
- Timely notice of public meetings with full public access to key decision-making processes
- Opportunity for early and continuing involvement in planning

Statistical data about participants and beneficiaries of LRPA programs, those who are relocated as a result of property acquisition, affected communities and populations, demographic information about Board members, and public meeting participants will be collected from sources such as:

- Sign-in sheets
- Census data
- Arkansas Department of Education
- Community-based organizations
- GIS
- Metroplan

### VIII. Limited English Proficiency

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice and US Department of Transportation require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently. The Little Rock Port Authority takes steps to ensure meaningful access to the benefits, services, information, and other important functions for individuals who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English (Limited English Proficient or LEP). Upon request, interpretation services and translation of alternative documents will be provided. Additionally, alternative means of outreach will be used to provide notice of opportunities for public input. Requests for alternative methods of communication may be made to Jean Pulliam, Civil Rights Coordinator at [jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com) or (501) 490-1468.

The following explanation of LEP regulations and demographics is based on work done by Metroplan, the metropolitan planning organization for Central Arkansas. Because the Little Rock Port Authority draws

employees and contractors from a large catchment area, Metroplan's analysis of data from the Central Arkansas region will be used for the required Four Factor Analysis.

### Background

On August 11, 2000, President William J. Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," to clarify Title VI of the Civil Rights Act of 1964. The purpose of the order was to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. The Executive Order states that individuals who do not speak English well and who have a limited ability to read, write, speak or understand English (Limited English Proficiency or LEP) are entitled to language assistance under Title VI of the Civil Rights Act 1964, with respect to a particular type of service, benefit, or encounter.

Each federal agency or recipient of federal financial assistance is required to prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other forms of financial contributions from federal sources. Each plan must be consistent with the standards set forth in the LEP Guidance, and must include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities, following the guidance of the federal agency from which the financial assistance is provided. The U.S. Department of Transportation published Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons in the Federal Register, dated December 14, 2005, which applies to the Little Rock Port Authority as a recipient of federal transportation funds.

The U.S. Department of Transportation (DOT) guidance applies to all DOT funding recipients, which includes state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation--not just the particular highway program or project--are covered by the DOT guidance.

LEP outreach is required by other federal funding programs. The Little Rock Port Authority will provide language assistance, though, for all services, whether federally funded or not.

The method proscribed for this assessment is a "Four Factor Analysis," which determines: (1) the number of LEPs eligible or likely to be encountered by programs; (2) the frequency that LEPs come into contact with agency programs, policies or plans; (3) the nature and importance of these programs and plans to LEPs; and (4) the resources available and costs to the program.

### LEP Populations in Central Arkansas: Four Factor Analysis

### *Factor 1 - Number of LEP Persons*

Approximately 2.5% of the persons living in the Little Rock-North Little Rock-Conway MSA have limited English proficiency.<sup>2</sup> Among those with Limited English Proficiency (those who speak English less than very well), the largest single group is composed of Spanish-speaking individuals.

Data from the American Community Survey was used to develop a profile of the relative sizes of the different language groups was developed. As Figure 1 shows, the remainder of local people with limited English proficiency is divided among much smaller groups.

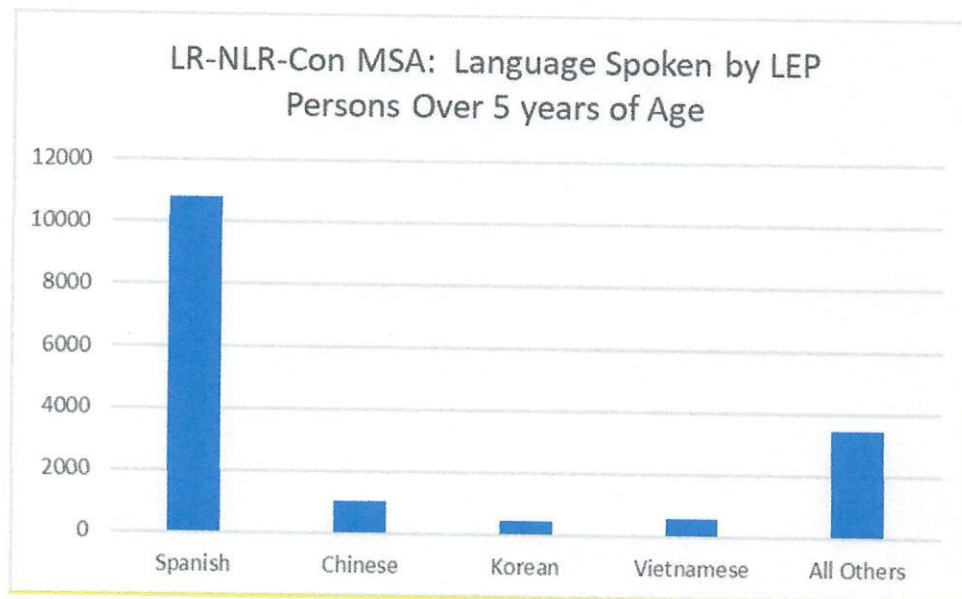


Figure 1

### *Factor 2 - LEP Persons' Frequency of Contact*

The Little Rock Port Authority serves a broad area in Central Arkansas, including a wide range of international economic interests due to its ever-changing customer base. India-based Welspun is an example of one such interest that may require additional effort to ensure adequate communication to and from persons with limited English proficiency.

To date, however, the LRPA has not received any requests for translation.

### *Factor 3 - Nature and Importance of Services*

The Port of Little Rock plays a large role in the Arkansas economy, serving a variety of business interests in the State. The Port of Little Rock serves as the port of record for towns like Arkadelphia, and shipping material to and from Hot Springs, Conway, Pine Bluff, and Sheridan. Communities outside of the twelve county Metro Little Rock Alliance area, like Russellville and Heber Springs, also use Port facilities.

In addition to providing vital shipping connections for local, state, national and international businesses, the Port Industrial Park provides employment for over 6,000+ individuals. However, the LRPA itself only directly employs nine people. Subcontractors like the logistics company that handles materials for the Port and construction and maintenance contractors are the only employers the LRPA can directly affect

<sup>2</sup> American Community Survey 2015 5 Year Estimates, Table B16001, Language Spoken At Home By Ability To Speak English for the Population 5 Years and Over.

with improved LEP services. Thus, a relatively small number of non-English speakers will be reached by LEP programming.

#### *Factor 4 - Resources Available for LEP Outreach and Costs*

Given that there have been no requests for translation services to date, a specific amount has not been budgeted for engaging minority and LEP populations, however, ad hoc translation services can be obtained as needed, either from the local universities and high schools, paid translators, or Google Translate.

Persons requiring special language services should contact:

Jean Pulliam, Civil Rights Coordinator  
10600 Industrial Harbor Drive  
Little Rock, AR 72206  
jpulliam@portoflittlerock.com  
(501) 490-1468

#### Safe Harbor and LEP Thresholds

The U.S. Department of Transportation (DOT) has adopted the Department of Justice's (DOJ) Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that if a recipient provides written translation of key documents for each eligible LEP language that constitutes five percent or 1,000 persons, whichever is less, of the total population eligible to be served or likely to be affected, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

These provisions apply to the written translation of documents only. They do not affect the requirement to provide meaningful access to LEP persons through competent oral interpreters where such services are needed and reasonable.

Based on the above analysis of the number of LED people in the Central Arkansas region, the number of Spanish speakers is above the Safe Harbor threshold, so that written translation of key documents is necessary. The number of Chinese speakers, on its face, is also above the Safe Harbor threshold; however, because the American Community Survey, on which the data are based, does not distinguish between speakers of Chinese and Mandarin, the exact numbers are not known at this time. Increases in the number of Chinese living in Central Arkansas will warrant a closer examination in the future to see if translation services are needed for this group.

#### Plan for Providing Language Assistance to LEP Persons

The number of Spanish speakers in Central Arkansas requires translation of written documents in addition to other services for this LEP group. It is important to note, however, that populations that do not meet the Safe Harbor threshold are still entitled to services under Title VI.

In addition to posting an LEP statement in Spanish and English on the website (Appendix J), the Little Rock Port Authority will take the following actions to ensure that LEP persons can meaningfully access the agency's programs and activities:

### *Meetings and Dissemination of Information*

- Public meeting notices and LRPA Board meeting notices will be translated into Spanish
- Legal notices and notices of LRPA Board meetings will be published in a Spanish newspaper with a Central Arkansas circulation of 30,000 or more Latinos.
- Meeting notices will state that upon request, interpreter services will be available at public meetings and summary written material will be provided in Spanish.
- Google Translator will be used, upon request, for material posted on the website.
- Employment notices for the LRPA and contractors will be posted in Spanish.

### *Translation of Key Documents*

- Summaries of future key documents, such as the Capital Improvement Plan will be translated into Spanish.
- Summaries of key meetings will be translated into Spanish.

### *Other Measures*

- A list of employees who competently speak Spanish and other languages and who are willing to provide translation and/or interpretation services will be maintained.
- This list will be distributed to staff who regularly have contact with the public.
- Agreements will be developed with local translators to provide oral and written LEP services with reasonable notification.
- Agreements will be developed with LEP churches, others in the community to provide oral and written LEP services with reasonable notification.

### Conclusion

Latinos are not the only ethnic group to find Central Arkansas a desirable place. Growing populations in the region also include Chinese, Indians and Middle Easterners. Although these groups do not currently meet the Safe Harbor threshold that will trigger LEP assistance, the Little Rock Port Authority nevertheless seeks to be inclusive in its engagement of the general public.

The Little Rock Port Authority is committed to complying with both the letter and spirit of Executive Order 13166 and Title VI provisions. Central Arkansas is experiencing the challenges—and benefits—that come with a diverse ethnic population. Like many others, Latinos continue to find Central Arkansas a good place to live, work and play. LRPA welcomes diversity and makes every effort to extend opportunity for engaging in the planning process.

The Little Rock Port Authority understands that its community profile is changing and the four factor analysis may reveal the need for more or varied LEP services in the future. As such, it will annually examine its LEP plan to ensure that it remains reflective of the community's needs.

### *IX. Civil Rights Assurances*

Required standard U.S. DOT assurances that outline the Port's guarantee for compliance with Title VI of the Civil Rights Act of 1964 as a recipient of federal financial assistance are set forth in Appendices E, F, G, and H located at the back of this document.

Every three years, or commensurate with a change in Little Rock Port Authority Leadership, the LRPA will certify that its programs, services, and activities are being conducted in a nondiscriminatory manner.

Appendix A  
City of Little Rock Civil Rights Ordinance No. 21,031

Section 1: The City of Little Rock shall not discriminate against vendors because of race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, political opinions or affiliation of vendors' owners. All City Departments, Divisions, Commissions and offices that contract with vendors shall adopt a written policy that reflects such non-discrimination in contracting.

Section 2: Employees of the City of Little Rock in providing City services to the public and public accommodations shall not discriminate because of race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetics information, political opinions or affiliation. All City Departments, Divisions, Commissions and offices shall adopt a written policy that reflects non-discrimination in providing City services.

Section 3: All contracts providing goods and services to the City of Little Rock shall contain a clause stating that the contracting party shall not discriminate on the basis of race, color, creed, religion, sex, national origin, age, disability, marital status, sexual orientation, gender identity, genetics information. All bids and proposals requests for such contracts from the City of Little Rock shall include notification of such a clause and the requirement that it be agreed to and followed. Adopted April 21, 2015.

Appendix B  
Complaint Form

<b>LITTLE ROCK PORT AUTHORITY COMPLAINANT INFORMATION</b>																	
Name <i>(first, middle, last)</i>																	
Address <i>(number and street, city, state, ZIP code)</i>																	
Home telephone number (    )    -	Work telephone number (    )    -	Cellular telephone number (    )    -															
<b>PERSON YOU BELIEVE DISCRIMINATED AGAINST YOU IF KNOWN</b>																	
Name <i>(first, middle, last)</i>		Title															
Name of department																	
Address <i>(number and street, city, state, ZIP code)</i>																	
Home telephone number (    )    -	Work telephone number (    )    -	Cellular telephone number (    )    -															
When was the last alleged discriminatory act? <i>(month, day, year)</i>																	
<p><b>Complaints of discrimination must be filed within 180 days of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.</b></p>          																	
<p><b>The alleged discrimination was based on:</b></p> <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Race</td> <td><input type="checkbox"/> Color</td> <td><input type="checkbox"/> Disability</td> <td><input type="checkbox"/> Gender</td> <td><input type="checkbox"/> National Origin</td> </tr> <tr> <td><input type="checkbox"/> Age</td> <td><input type="checkbox"/> Ancestry</td> <td><input type="checkbox"/> Retaliation</td> <td><input type="checkbox"/> Religious Affiliation</td> <td><input type="checkbox"/> Political Opinions*</td> </tr> <tr> <td><input type="checkbox"/> Creed*</td> <td><input type="checkbox"/> Sex*</td> <td><input type="checkbox"/> Marital Status*</td> <td><input type="checkbox"/> Sexual Orientation*</td> <td><input type="checkbox"/> Genetics*</td> </tr> </table>			<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age	<input type="checkbox"/> Ancestry	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Religious Affiliation	<input type="checkbox"/> Political Opinions*	<input type="checkbox"/> Creed*	<input type="checkbox"/> Sex*	<input type="checkbox"/> Marital Status*	<input type="checkbox"/> Sexual Orientation*	<input type="checkbox"/> Genetics*
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender	<input type="checkbox"/> National Origin													
<input type="checkbox"/> Age	<input type="checkbox"/> Ancestry	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Religious Affiliation	<input type="checkbox"/> Political Opinions*													
<input type="checkbox"/> Creed*	<input type="checkbox"/> Sex*	<input type="checkbox"/> Marital Status*	<input type="checkbox"/> Sexual Orientation*	<input type="checkbox"/> Genetics*													

\* Designates areas protected by CLR ordinance and information, not Title VI.

**Describe the alleged act(s) of discrimination. (Use additional pages, if necessary)**

<b>Provide the names of any individuals with additional information regarding your complaint:</b>		
Name of witness 1 ( <i>first, middle, last</i> )		Title
Name of company		
Address ( <i>number and street, city, state, ZIP code</i> )		
Home telephone number (     )     -	Work telephone number (     )     -	Cellular telephone number (     )     -
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination:		

Return this form to:  
Jean Pulliam, Civil Rights Coordinator  
Little Rock Port Authority  
10600 Industrial Harbor Drive  
Little Rock, AR 72206  
(501) 490-1468

Name of witness 2 ( <i>first, middle, last</i> )		Title
Name of company		
Address ( <i>number and street, city, state, ZIP code</i> )		
Home telephone number (     )     -	Work telephone number (     )     -	Cellular telephone number (     )     -
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination:		

Name of witness 3 ( <i>first, middle, last</i> )		Title
Name of company		
Address ( <i>number and street, city, state, ZIP code</i> )		
Home telephone number (     )     -	Work telephone number (     )     -	Cellular telephone number (     )     -
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination:		

Return this form to:  
Jean Pulliam, Civil Rights Coordinator  
Little Rock Port Authority  
10600 Industrial Harbor Drive  
Little Rock, AR 72206  
(501) 490-1468

Appendix C  
Complaint Consent / Release

### Complaint Consent / Release

Name <i>(first, middle, last)</i>	Telephone number  (    )    -
Address <i>(number and street, city, state, ZIP code)</i>   	
Case number(s) <i>(if known)</i>  	
<p>As a complainant, I understand that during an investigation it may become necessary for the Little Rock Port Authority to reveal my identity to individuals outside of the Port in the course of verifying information or gathering facts and evidence to develop a basis for making a civil rights compliance determination. I understand that it may be necessary for the Little Rock Port Authority to share information, including personal details collected as part of its complaint investigation. In addition, I understand that as a complainant, I am protected by Title VI of the Civil Rights Act of 1964, as amended, and its related statutes and regulations prohibiting intimidation or retaliation for taking action or participating in an action to secure rights protected by the nondiscrimination statutes.</p>	
<p><i>Please read both paragraphs below, check your choice of CONSENT or CONSENT DENIED and sign below. (Please mark one)</i></p> <p style="text-align: center;"><b>CONSENT</b></p> <p>I have read and understand the above information and authorize the Little Rock Port Authority to disclose my identity to individuals as needed during the course of the investigation for the purpose of verifying information or gathering facts and evidence relevant to the investigation of my complaint. I authorize the Little Rock Port Authority to receive, review, and discuss material and information about me relevant to the investigation of my complaint. I understand that the material and information will be used for authorized civil rights compliance and enforcement activities. I further understand that I am not required to authorize this release and volunteer to do so.</p> <p style="text-align: center;"><b>CONSENT DENIED</b></p> <p>I have read and understand the above information and do not want the Little Rock Port Authority to disclose my identity to any individual during the course of the investigation. I understand this choice could delay the investigation of my complaint and may, in some circumstances, result in an administrative closure of the investigation of my complaint without The Little Rock Port Authority making a determination in my case.</p>	
Signature	Date <i>(month, day, year)</i>

Return this form to Jean Pulliam, Civil Rights Coordinator

Little Rock Port Authority – 10600 Industrial Harbor Drive – Little Rock, AR 72206

Appendixes D – H are required in DOT-funded projects

## Appendix D

### Process for Considering/Mitigating Environmental Justice Issues

In its Civil Rights Policies and Procedures, the Little Rock Port Authority is required to adopt methods for public participation and provide public access to complete information and early notice, as well as, continuous public comment in all its services. While not directly associated with public participation, Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, supplements Title VI and expands public participation requirements, stating that environmental justice requires fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. If elderly persons, children, LEP individuals, or persons with disabilities are members of the impacted communities, they must be considered in the overall impact analysis.

Environmental justice compliance requires that entities: 1) avoid, minimize, or mitigate disproportionately high or adverse health and environmental effects, including social and economic effects, on minority and low-income populations; 2) ensure full and fair participation by all potentially affected communities and entity's consideration in decision-making processes; and 3) prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations. Adverse effects include, but are not limited to bodily impairment, infirmity, illness, or death; air, noise, and water pollution; soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of benefits of U.S. DOT programs, policies, or activities.

When planning specific programs or projects, the LRPA will use U.S. Census data to identify those populations that will be disproportionately affected by a given program or project.

- If a disproportionate effect is anticipated, mitigation options will be identified.
- If mitigation options do not sufficiently eliminate the disproportionate effect, reasonable alternatives will be discussed and implemented, if necessary.

Where a project impacts a small number or area of low income or minority populations, the LRPA will document that:

- Other reasonable alternatives were evaluated and were eliminated for reasons such as the alternatives impacted a far greater number of people or did greater harm to the environment; etc.
- The project's impact is unavoidable;
- The benefits of the project far out-weigh the overall impacts; and
- Mitigation measures will be taken to reduce the harm to low income or minority populations.

If it is concluded that no minority and/or low income population groups are present in the project

area, the LRPA will document how the conclusion was reached. If it is determined that one or more of these population groups are present in the area, the City will administer potential disproportionate effects test.

The following steps will be taken to assess the impact of project on minority and/or low income population groups:

STEP ONE: Determine if a minority or low income population is present within the project area. If the conclusion is that no minority and/or low income population is present within the project area, document how the conclusion was reached. If the conclusion is that there are minority population and/or low income population groups present, proceed to Step Two.

STEP TWO: Determine whether project impacts associated with the identified low income and minority populations are disproportionately high and adverse. If it is determined that there are disproportionately high and adverse impacts to minority and low income populations, proceed to Step Three.

STEP THREE: Propose measures that will avoid, minimize and/or mitigate disproportionately high and disproportionate adverse impacts and provide offsetting benefits and opportunities to enhance communities, neighborhoods and individuals affected by proposed project.

STEP FOUR: If after mitigation, enhancements and off-setting benefits to the affected populations, there remains a high and disproportionate adverse impact to minority or low income populations, then the following questions must be considered:

Question 1: Are there further mitigation measures that could be employed to avoid or reduce the adverse effect to the minority or low income population?

Question 2: Are there other additional alternatives to the proposed action that would avoid or reduce the impacts to the low income or minority populations?

Question 3: Considering the overall public interest, is there a substantial need for the project?

Question 4: Will the alternatives that would satisfy the need for the project and have less impact on protected populations (a) have other social economic or have increased costs of extraordinary magnitude?

STEP FIVE: Include all findings, determinations or demonstrations in the environmental document prepared for the project.

## APPENDIX E

### CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Specific Assurance 4:

**NOW, THEREFORE**, the U.S. Department of Transportation as authorized by law and upon the condition that the Recipient will accept title to the lands and maintain the project constructed thereon in accordance with The Consolidated Appropriations Act, 2016 (Pub. L. 114-113, December 18, 2015) the Regulations for the Administration of FY 2016 TIGER Discretionary Grants Program, and the policies and procedures prescribed by the Maritime Administration (MARAD) of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Recipient all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

#### (HABENDUM CLAUSE)

**TO HAVE AND TO HOLD** said lands and interests therein unto Recipient and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the Recipient, its successors and assigns.

The Recipient, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]\* (2) that the Recipient will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

## APPENDIX F

### CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Recipient pursuant to the provisions of Specific Assurance 7(a):

- A. The (Recipient, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
  - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (Recipient, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Recipient will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.\*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Recipient will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Recipient and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

## APPENDIX G

### CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Recipient pursuant to the provisions of Specific Assurance 7(b):

- A. The (Recipient, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (Recipient, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Recipient will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.\*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Recipient will there upon revert to and vest in and become the absolute property of Recipient and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

## APPENDIX H

### Language for Contractors

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

#### **Pertinent Non-Discrimination Authorities:**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 C.F.R. Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 C.F.R. Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 U.S.C. § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 – 12189) as implemented by Department of Transportation regulations at 49 C.F.R. Parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. § 1681 *et seq.*).

## **Appendix I**

### **Little Rock Port Authority**

#### **Notice and Frequently Asked Questions (FAQ) about Reasonable Accommodations for Individuals with Disabilities**

The Little Rock Port Authority is committed to providing individuals with disabilities an equal opportunity to participate in and benefit from its programs, activities, and services. Individuals may request reasonable accommodations from the Little Rock Port Authority that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services.

To request reasonable accommodations, contact Jean Pulliam, Civil Rights Coordinator, 10600 Industrial Harbor Drive, Little Rock, AR 72206, [jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com) or telephone (501) 490-1468. Hearing and speech impaired may dial 711.

#### **FREQUENTLY ASKED QUESTIONS (FAQ)**

**1. What is a reasonable accommodation in the Little Rock Port Authority's programs?**

A reasonable accommodation is a change or modification to afford a qualified individual with a disability full enjoyment of the Little Rock Port Authority's programs or activities, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to the Little Rock Port Authority.

**2. Does my request for a reasonable accommodation need to be in writing?**

No, you do not need to put your request in writing, however, making a written request can be helpful documentation for ensuring that the Little Rock Port Authority provides the desired accommodation. In addition, you do not need to use the specific words "reasonable accommodations" when making your request.

**3. When should I request a reasonable accommodation?**

You may request a reasonable accommodation from the Little Rock Port Authority at any time. However, making the request in advance of a meeting, conference call, or visit will help ensure that the Little Rock Port Authority is able to fulfill the request for an accommodation. For certain requests, such as requests for sign language interpretation or other language interpretation, the Little Rock Port Authority requests at least two week's advance notice.

**4. May someone request a reasonable accommodation on my behalf?**

Yes, anyone can request a reasonable accommodation on behalf of an individual with a disability who seeks to interact with the Little Rock Port Authority staff or participate in its programs or activities.

5. What will the Little Rock Port Authority do upon receiving my request for a reasonable accommodation?

The Little Rock Port Authority may contact you to obtain more information about your request and to better understand your needs. In addition, the Little Rock Port Authority may review your request to determine:

- Whether the requested accommodation will be effective in allowing you to participate in the activity or program in which you are seeking participation;
- Whether the requested accommodation is reasonable, or an equally effective alternative to the requested accommodation is available; and
- Whether providing you with the requested accommodation would fundamentally alter the nature of the Little Rock Port Authority's program or impose undue financial or administrative burdens on the Little Rock Port Authority.

In addition, in some cases, the Little Rock Port Authority may consult with you in an interactive process to determine on a case-by-case basis what accommodations can be made.

If the Little Rock Port Authority determines that your requested accommodation would fundamentally

alter the nature of the program or impose an undue financial or administrative burden, the Little Rock Port Authority may deny your request. However, in the unlikely event that this occurs, the Little Rock Port Authority will work with you to identify an alternative accommodation that allows you to effectively participate in the Little Rock Port Authority's program, activity, or service.

6. May the Little Rock Port Authority request medical documentation from you after receiving your request for a reasonable accommodation?

No, the Little Rock Port Authority may not request medical documentation after receiving your request for a reasonable accommodation. The Little Rock Port Authority's questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.

7. May the Little Rock Port Authority charge you the cost of providing the reasonable accommodation?

No, you are not responsible for the cost of an auxiliary aid or service provided to you.

8. What are some examples of reasonable accommodations?

- Arranging for qualified sign language interpreters
- Providing on-site captioning
- Producing alternate formats of print materials in braille, large print, or in an electronic format
- Providing remote conference captioning services
- Furnishing a temporary ramp to access the dais or other areas with one or more stairs to ensure accessibility for individuals who have physical disabilities and may be using a wheelchair or walker.

Appendix J  
LEP Statement

**Persons With Limited English Proficiency (LEP)**

The Little Rock Port Authority makes every effort to accommodate individuals who have a limited proficiency in speaking, reading or understanding English. Upon request, the Little Rock Port Authority will provide interpretation services, and can provide some document translation. If you need language assistance, please leave your request at [jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com) or call 501-490-1468. If you need a language interpreter or materials translated for a public meeting, please make your request at least three days in advance of the event.

**PERSONAS CON DOMINIO LIMITADO DEL INGLÉS (LEP)**

The Little Rock Port Authority se asegura en acomodar a personas que tienen un dominio limitado al hablar, leer, o entender el idioma del inglés. Al solicitarlo, el Little Rock Port Authority puede proporcionar un servicio de interpretación y puede facilitar documentación traducida. Si usted necesita asistencia con el idioma, por favor enviar una petición a: [jpulliam@portoflittlerock.com](mailto:jpulliam@portoflittlerock.com) o llamar al (501) 490-1468. Si necesita un intérprete o el material traducido en el momento de la reunión pública, por favor enviar la solicitud tres días antes de la reunión.