

National Aeronautics and Space Administration
Mary W. Jackson NASA Headquarters
Washington, DC 20546-0001



July 16, 2021

Reply to Attn of: Office of Diversity and Equal Opportunity

Ms. Alison Brown
President and CEO
Science Museum of Minnesota
120 Kellogg Boulevard
St. Paul, MN 55102

Dear Ms. Brown:

The National Aeronautics and Space Administration (“NASA” or “the Agency”) conducted a compliance review of the Science Museum of Minnesota (“SMM” or “the Museum”), a recipient of NASA financial assistance. The Agency issued its compliance findings on September 17, 2020. NASA conducted the limited scope review pursuant to Section 504 of the Rehabilitation Act of 1973 (“Section 504”) and the Agency’s Section 504 implementing regulations at Title 14 Code Federal Regulations Part 1251, which prohibit discrimination on the basis of disability in programs receiving Federal financial assistance through NASA or conducted by NASA. The Agency focused its review on SMM’s compliance with the Section 504 procedural requirements, such as the need to establish Section 504 grievance procedures, and substantive requirements, such as effective communication and architectural accessibility for persons with disabilities.

Finding of Non-Compliance and Corrective Actions Required

Based on its review, NASA found SMM in non-compliance with Section 504 obligations including several Section 504 procedural requirements as well as architectural and digital accessibility requirements. Regarding compliance with Section 504 procedural requirements, NASA required that SMM provide evidence of the completion of the corrective actions identified within 90 days of the date of NASA’s letter of finding and compliance report. Regarding compliance with architectural and digital accessibility requirements, NASA required that SMM provide evidence of the completion of the corrective actions identified within 180 days from the date of this letter and report, including timelines for resolution of all issues. In recognition of the current realities presented by COVID-19 and the impacts of the Coronavirus pandemic on SMM’s operations, ASA provided SMM with flexibility regarding these timeframes.

As of June 30, 2021, SMM provided the following status on the actions it has taken consistent with NASA's requirements to address the Agency's finding of non-compliance with Section 504:

- **Self-Evaluation.** The Museum conducted a Section 504 evaluation, using, at NASA's recommendation, the National Endowment for the Arts, which provides a suggested Section 504 Self-Evaluation Workbook at <https://www.arts.gov/open-government/civil-rights-office/section-504-self-evaluation-workbook>. SMM modified policies and practices in conformity with NASA compliance requirements, for example, establishing grievance procedures under Section 504 (see below).
- **Section 504 Coordinator.** NASA required the Museum to name a Section 504 Coordinator and notify NASA of the name and title of the Section 504 Coordinator. The Section 504 Coordinator, Ronda Maurer, Director, Visitor Experience, is named publicly on the Museum's Web site at <https://www.smm.org/accessibility/grievance-procedure>. In addition, the Coordinator has taken several disability related training courses, consistent with NASA recommendations, for example, the Museum Education Institute, Art Beyond Sight: Disability and Inclusion. Also, consistent with NASA's recommendation, the Museum named an accessibility committee to work with the Section 504 Coordinator. In addition to the Section 504 Coordinator, the Committee is comprised of the Directors of Facilities, Exhibits, HR, Information Technology Services, Museum Access and Equity, Marketing and Communications, Safety and Security, Research and Evaluation, Visitor Experience and Volunteer Services, and the Vice President for People and Museum Culture.
- **Grievance Procedures.** The Museum enhanced its existing grievance procedures, in accordance with NASA's recommendations, by including specific timelines for review and resolution of complaints and appeals of complaint findings. Also, in accordance with NASA's recommendations, the Museum posted the procedures publicly on the Museum's Web site, located at <https://www.smm.org/accessibility/grievance-procedure>.
- **Notice.** The Museum notified employees and program participants of its non-discrimination policy in its programs and activities and the identity of its Section 504 Coordinator. This information is located at <https://www.smm.org/accessibility/grievance-procedure>, along with the Museum's grievance procedures.
- **Transition Plan.** The Museum developed and is implementing a plan for remediating the barriers identified. This plan describes methods for eliminating these barriers, includes a schedule include for removing them, and identifies the person responsible for implementing the transition plan.

NASA finds that through these efforts, SMM has met the Section 504 obligations identified by NASA based on its Section 504 compliance review.


For additional civil rights technical assistance, you may also wish to visit our MissionSTEM Web site at <http://missionstem.nasa.gov/>. The Agency designed the MissionSTEM Web site to assist NASA grant recipients in meeting their compliance obligations under NASA's equal opportunity laws and regulations. To this end, the site provides a host of information and resources on compliance requirements as well as promising practices of our grant recipients.

Please be advised that in the interest of transparency, NASA posts completed Section 504 compliance and related reports on our MissionSTEM Web site, which is accessible to the public. Individuals may request the report and related records through the Freedom of Information Act. The Agency develops the reports, to the extent possible, without revealing personal information that could result in an unwarranted invasion of privacy.

If you have any questions regarding this correspondence, please contact David Chambers of my staff at 202-358-2128, or David.R.Chambers@nasa.gov. Thank you for your cooperation during our compliance review and for promptly remediating the items identified.

Sincerely,

Richard
Reback

 Digitally signed by
Richard Reback
Date: 2021.07.16
12:42:04 -04'00'

Richard N. Reback
Director
Equal Opportunity Programs Division

cc: Stephen T. Shih, Associate Administrator, Office of Diversity and Equal Opportunity