

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



March 30, 2012

Reply to Attn of:

Office of Diversity and Equal Opportunity

Ms. Ellen V. Futter  
President  
American Museum of Natural History  
Central Park West at 79th Street  
New York, NY 10024-5192

Dear Ms. Futter,

The National Aeronautics and Space Administration (NASA) has completed a compliance review of the American Museum of Natural History (AMNH or the Museum), a recipient of NASA financial assistance. This limited scope review was conducted pursuant to Title VI of the Civil Rights Act of 1964 (Title VI), NASA's Title VI implementing regulations at 14 C.F.R. Part 1250, which prohibit discrimination on the basis of race, color, or national origin in programs receiving Federal financial assistance through NASA, and NASA's Policy Guidance on the Prohibition Against National Origin Discrimination as It Affects Persons With Limited English Proficiency (68 Fed. Reg. 70039). A copy of the regulations and policy guidance are enclosed.

The review was conducted to determine whether the Museum was in compliance with NASA's Title VI regulations and policy guidance; specifically, to ensure that the Museum was taking adequate steps to ensure meaningful access to its programs and services to persons with limited English proficiency (LEP). Please also find enclosed a copy of NASA's report of the compliance review.

Based on an evaluation of data provided by the Museum and on-site interviews and observations, NASA finds that the AMNH is in full compliance with the requirement to take adequate steps to ensure meaningful access to LEP individuals, as clarified in the NASA Title VI LEP Guidance and recent DOJ guidance. As we state in our compliance report, since becoming informed of its obligations to conduct a Four Factor Analysis and develop a written LEP Plan at the outset of this review, the Museum has met, and in many cases, exceeded its LEP obligations.

More specifically, the Museum has undertaken a thorough Four Factor Analysis, appropriately utilizing NASA's LEP Guidance. The Museum has also developed and is now in the process of implementing, a Language Access Plan that conforms largely with NASA and DOJ Title VI-LEP regulations and policy, with one notable exception – the use of a machine translation, Google Translate. This is a practice discouraged by DOJ. NASA recommends that AMNH have its use of Google Translate reviewed by a qualified

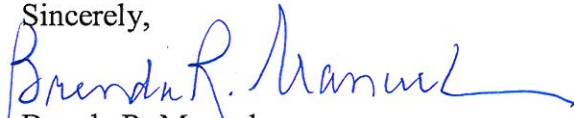
language professional, among other things (see Recommendation, pp. 9-10). Nonetheless, in many ways, AMNH's commitment to LEP, as demonstrated through its LEP Plan and the programs and initiatives the Museum is pursuing under the Plan, is a model for similar organizations with LEP responsibilities. NASA plans to disseminate AMNH's promising practices to our other museum and science center grant recipients to assist them in meeting LEP requirements.

NASA stands ready to provide further technical assistance to AMNH as it continues to meet its LEP obligations under Title VI of the 1964 Civil Rights Act. We will contact the Museum in six months from the date of the issuance of this report to request a follow-up on NASA's recommendations to enhance the Museum's existing compliance.

Under the Freedom of Information Act, it may be necessary to release the report and related records on request. If NASA receives such a request, it will seek to protect, to the extent provided by law, personal information which, if released, could reasonably be expected to constitute an unwarranted invasion of privacy.

If you have any questions regarding this correspondence, please contact Mr. David Chambers, Senior Civil Rights Analyst, Program Planning and Evaluation Division, Office of Diversity and Equal Opportunity, on 202-358-0446 or at [david.r.chambers@nasa.gov](mailto:david.r.chambers@nasa.gov).

Sincerely,



Brenda R. Manuel

Brenda R. Manuel  
Associate Administrator for  
Diversity and Equal Opportunity

Enclosures

cc:

Merrily Sterns, Vice President, Institutional Advancement American Museum of Natural History

Gerald Singer, General Counsel