

National Aeronautics and Space Administration

**Headquarters**  
Washington, DC 20546-001



March 25, 2016

Reply to Attn of:

Office of Diversity and Equal Opportunity

Dennis M. Wint, Ph.D  
President and CEO  
The Franklin Institute  
222 North 20th Street  
Philadelphia, PA 19103

Dear Dr. Wint,

The National Aeronautics and Space Administration (NASA) has completed a compliance review of the The Franklin Institute (the Institute), 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). Copies of the regulations and policy guidance are enclosed.

The review was conducted to determine whether the Institute was in compliance with NASA's Title VI regulations and policy guidance; specifically, to ensure that the Center 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 its compliance review, NASA finds that the Institute should take additional steps to strengthen its LAP, consistent with NASA and DOJ LEP requirements and considerations. More specifically, the Institute should carefully review specific aspects of the Four Factor Analysis (as provided in NASA's LEP Guidance) and the DOJ 2011 guidances to better address such matters as the safe harbor provision, staff training, utilization of mechanisms to make Web content accessible, among other recommendations from this report. NASA requests that the Institute provide its updated LAP three months after the issuance of this report. Upon receipt of the Institute's updated LAP in June, NASA will provide additional assessment of the Institute's compliance with Title VI-LEP requirements.

While NASA has specific recommendations for the Institute to better ensure compliance with LEP requirements, we also found that it has a number of promising practices insofar as steps to ensure meaningful access to LEP individuals. The Institute's participation in

the Philadelphia Science Festival and its LEP efforts in that context are excellent examples. In addition, 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 Institute has established additional programs and practices to meet its LEP obligations.

NASA stands ready to provide further technical assistance to the Foundation and the Center as it continues to meet its LEP obligations under Title VI of the 1964 Civil Rights Act. For additional civil rights technical assistance, you may also wish to visit our MissionSTEM website at <http://missionstem.nasa.gov/>. The MissionSTEM Web site is designed 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.

Be advised that in the interest of transparency, ODEO may post completed Title VI compliance reports on our public Website. The report and related records may also be requested through the Freedom of Information Act. However, the reports are written, 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 Mr. Robert Cosgrove, External Programs Compliance Manager, Program Planning and Evaluation Division, Office of Diversity and Equal Opportunity, on 202-358-0446 or at [robert.cosgrove@nasa.gov](mailto:robert.cosgrove@nasa.gov).

Sincerely,



Brenda R. Manuel  
Associate Administrator for  
Diversity and Equal Opportunity

Enclosures

Cc: Dr. Karen Enlich, Director of Science Content & Learning Technologies