**Dec. 2, 2022 version**

**Sample Airport Sponsor Title VI Plan**

# 1. Title VI Policy Statement[[1]](#footnote-2)

**[Airport Sponsor]** assures that no person shall on the grounds of race, color, national origin (including limited English proficiency (LEP)), sex (including sexual orientation and gender identity), creed, or age, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), Section 520 of the Airport and Airway Improvement Act of 1982, and related authorities (hereafter, “Title VI and related requirements”), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives U.S. Department of Transportation (DOT) funding. Title VI also prohibits retaliation for asserting or otherwise participating in claims of discrimination.

**[Airport Sponsor]** further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not **[*If applicable:*** *“, including any programs or activities of our sub-recipients”***]**. The Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities the **[Airport Sponsor]** will take action to involve them and the general public in the decision making process.

**[Airport Sponsor]** requires nondiscrimination assurances, as prescribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Assurances must be included in any related lease, contract, or franchise agreement between **[Airport Sponsor]** and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

**[Title VI Coordinator’s name]**, available at **[phone]** and **[email]**,is responsible for overseeing the Airport Sponsor’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

***Signature* Effective Date**

**[Director Name]**

**[Director Title] [Effective Date plus 3 years]**

**3-Year Expiration Date**

# 2. Administration

**[*Airport Commission, or equivalent governing authority*]** has reviewed and adopted this Title VI Plan for **[Airport Sponsor]**. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the **[*Airport Director, or equivalent*]**’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the **[*Commission, Board, or equivalent authority*]**and resubmittal to FAA.

In addition to the Coordinator and airport sponsor’s leadership, the following people also assist with our Title VI program requirements: **[*list below or write*** *“none”***]**

|  |  |
| --- | --- |
| **Staff Supporting Title VI Program** | **Airport Sponsor Program / Office** |
| *Abby Smith* | *Concessions Development* |
| *Joe Hernandez* | *Community Relations* |
| […] |  |

**[*Add or delete lines, as needed*]**

**[Airport Sponsor or State DOT]** has the following airport program sub-recipients: **[*list below or write*** *“none;”* ***if your list of sub-recipients is lengthy, you may move the list to the Appendix]***

|  |
| --- |
| **Sub-Recipients** |
| *Hillsdale County Airport Board* |
| *Parktown Parish* |
| […] |

**[*Add or delete lines, as needed*]**

As of the date of this plan, **[Airport Sponsor]** has the following pending applications for Federal financial assistance: **[*list AIP and other grants below (if known) or write*** *“none”***]**

|  |  |  |
| --- | --- | --- |
| **Federal Source** | **Grant Number** | **Amount** |
| *DHS* | *TZ-12345* | *$1,000,000* |
| *FAA AIP* | *AB-12345* | *$2,000,000* |
| […] |  |  |

**[*Add or delete lines, as needed*]**

**[*If applicable:* “**In addition, **[Airport Sponsor’s or State DOT’s]** sub-recipientshave the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT): **[*list below (if known) or write “****none****;” you may move this list to the Appendix, if it is lengthy]***

|  |  |  |
| --- | --- | --- |
| **Federal Source** | **Grant Number** | **Amount** |
| *DOJ* | *TZ-678* | *$3,000,000* |
| *DOJ* | *AB-678* | *$4,000,000* |
| […] |  |  |

**[*Add or delete lines, as needed*]**

Updated information for pending and awarded grant applications will be available through the following methods: **[*list method or location (e.g., website) below or write*** *“none”***]**

|  |  |
| --- | --- |
| **Federal Source** | **Grant Award Information Available at:** |
| *DHS* | *www.DHSgrantinfo.gov* |
| *DOJ* | *www.USgrantsinfo.net* |
| *FAA AIP* | *https://www.faa.gov/airports/aip/* |
| […] |  |

**[*Add or delete lines, as needed*]**

# 3. Grant and Procurement Assurances

49 CFR § 21.7 (a)(1); 49 CFR Part 21 Appendix C (b)

**[Airport Sponsor]** will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See <https://www.faa.gov/airports/aip/grant_assurances/#current-assurances>.

Clauses/Covenants

1. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See <https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/>. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
2. **[Airport Sponsor]** requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. **[*Add narrative discussing the methods (e.g., directives, required templates, periodic checks of sub-recipient and sub-contractor agreements, etc.)*]**

|  |
| --- |
| **Description of Oversight Methods for Subcontracts** |
| *Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Procurement Dept. to verify they include the template language, for not less than 10 percent of contractors each year.* |

# 4. Title VI Coordinator Responsibilities

The Coordinator is responsible for ensuring that they and other staff supporting the Title VI are trained in Title VI requirements. Essential training topics include:

* Basic Title VI requirements
* Airport language assistance resources and practices
* Collecting and assessing demographic data
* Reporting Title VI complaints and other required FAA notifications.

See Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

* Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to **[Airport Sponsor]** leadership on the status of Title VI compliances.
* Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
* Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
* Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
* Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor’s leadership.
* Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
* Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
* Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan.

The Coordinator **[**“*has*” **or** “*has not*”**]** requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>). **[*If applicable:*** [**Airport Sponsor**] will request access for the Coordinator by **[date]**.**]**

# 5. Notice

49 CFR Part 21 Appendix C(b)(2)(ii)

**[Airport Sponsor]** will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,[[2]](#footnote-3) and maintained. The poster template is available at <https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/> and a completed copy is attached. See Section 15 Appendix.

**[Airport Sponsor]** has posted the above Title VI policy statement at its staff offices.

**[Airport Sponsor] [***“has distributed”* **or** *“will distribute”***]** this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants.This plan **[***“was”* **or** *“will be”***]** distributed by **[Date]** by **[*identify methods, such as*** *“email and at tenants meeting.”***]**.

Posters are displayed in **[**“the” **or** “each”**]** terminal and other areas on airport property, including the following public locations: **[*See examples of language for poster locations in table.*]**

|  |  |  |  |
| --- | --- | --- | --- |
| **Terminal/FBO/Concessions/ Other Locations** | **Quantity in  Pre-Security Area** | **Quantity in  Post-Security Area** | **Additional Quantities** |
| *Terminal A* | *2* | *12* |  |
| *Rent-a-Car* |  |  | *1* |
| *SkyTrain* |  |  | *1* |
| […] |  |  |  |

**[*Add or delete lines, as needed*]**

Outreach to Affected Communities

**[*Identify Responsible Office*]** ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and **[*add other media used*]**. **[*Identify Responsible Office*]** contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities[[3]](#footnote-4) and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

**[*If applicable*:** Detailed information on our public notice and outreach procedures is available in the [**Airport Sponsor**] CPP. A copy of the CPP is available at **[*insert URL or other location information*]**. A copy of each CPP report completed since the last Title VI Plan is **[**“*available at* ***[insert URL]***” **or** “*attached to this Title VI Plan*”**]**. **]**

**[*If applicable:*** **[Airport Sponsor]** will create a detailed CPP by **[date]**. A copy of the plan will be available at **[*insert URL or other location information*]**.**]**

To ensure that the community is effectively informed of and able to participate in public hearings, **[*Identify Responsible Office*]** includes public notices translated into appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include direction for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

# 6. Community Statistics

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the **[Airport Sponsor]** will be able to identify, understand, and engage with communities. In doing so, the **[Airport Sponsor]** needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by **[Airport Sponsor’s]** airport program.

**[*In the table below, list each affected community and its population size (if known) – “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.*]*.* [*See examples of Affected Communities in table.*]**

|  |  |
| --- | --- |
| **Affected Communities[[4]](#footnote-5)** | **Population** |
| *Airport View Estates* | *3,000* |
| *Historic Heights* | *1,000* |
| *West Village* | *10,000* |
| […] |  |

[*Add or delete lines, as needed*]

(Hereafter, the above communities will be referred to collectively as “the Affected Communities”).

We have identified the following facts about the Affected Communities:

Low Income Communities[[5]](#footnote-6).

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” **[Airport Sponsor]** is collecting information about affected and potentially affected low-income communities. According to **[*cite source, for example a U.S. Census Report, such as*** [***S1701: Poverty Status in the Past 12 Months***](https://data.census.gov/cedsci/table?q=S1701)**]**, the overall poverty level for the **[*identify a reasonable scope, encompassing the entire area affected by and benefitting from the airport operations, e.g., metropolitan area, county, state, etc., that includes all of the Affected Communities*]** is approximately **[*identify percentage*]** %. The poverty rate remains **[**“low,” “similar,” “high”**]** compared with the rest of the **[*identify a reasonable larger area for useful comparison, e.g., region, state, country*]**. The poverty rates for the specific Affected Communities are as follows **[*list, if Census or local data is available*]**.

|  |  |
| --- | --- |
| **Affected Communities** | **Poverty Rate** |
| *Airport View Estates* | *1.0%* |
| *Historic Heights* | *5.0%* |
| *West Village* | *25.0%* |
| […] | % |

**[*Add or delete lines, as needed. Add poverty rate data, for example from the “Percent below poverty level” column from Table S1701, American Community Survey (ACS) 5-Year Estimate to populate the data for the Poverty Rate column in the above table.*  See** [***S1701: Poverty Status in the Past 12 Months***](https://data.census.gov/cedsci/table?q=S1701)**]]**

Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows[[6]](#footnote-7): **[*add an additional table for each Affected Community*]**

|  |  |  |
| --- | --- | --- |
| **Affected Community: \_\_*West Village*\_\_\_\_\_\_\_\_**  **Total Affected Community Population: \_\_\_*10,000*\_\_\_\_\_\_\_** | | |
| **Demographic Group within Affected Community** | **Number of People in Minority Group** | **Percent of Total Affected Community Population** |
| *White* | *2500* | *25%* |
| *Black or African American* | *1500* | *15%* |
| *American Indian or Alaska Native* | *500* | *5%* |
| *Asian* | *1000* | *10%* |
| *Native Hawaiian or Other Pacific Islander* | *500* | *5%* |
| *Hispanic or Latino* | *3000* | *30%* |
| *More than one* | *500* | *5%* |
| *No response / would not say* | *500* | *5%* |
| […] |  | % |

***[Add more lines and charts, as necessary. Add relevant data, for example from the Total column for Table S1701, ACS 5-Year Estimate to populate the data for Number of People in Minority Group column in each affected community table.*  See** [***S1701: Poverty Status in the Past 12 Months***](https://data.census.gov/cedsci/table?q=S1701)**]**

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **[Airport Sponsor]** communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages[[7]](#footnote-8) that are spoken in LEP households in the Affected Communities. The data source is **[Source*, for example American Community Survey*]**.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.[[8]](#footnote-9) The safe harbor for our community is **[Calculate the safe harbor. If the total population in your area is 20,000 or greater, then the safe harbor is 1,000. If the total population in your area is less than 20,000, then the safe harbor will be 5% of the total population. For example, if your total population is 15,000, the safe harbor should be 750]**. Please refer to the end of this document to find data for all languages in our community.

|  |  |  |
| --- | --- | --- |
| **Languages Spoken by LEP Population that Meet the Safe Harbor Threshold** | **Number** | **Margin of Error** |
| *Spanish* | 1200 | +/-100 |
| *Chinese (incl. Mandarin, Cantonese)* | 1000 | +/-50 |
| *Tagalog (incl. Filipino)* | 500 | +/-30 |
| *Vietnamese* | 300 | +/-20 |
| *Arabic* | 200 | +/-20 |
| *Korean* | 100 | +/-20 |
| *French* | 100 | +/-20 |
| […] |  |  |

**[*Add or delete lines, as needed, for languages that meet the threshold. Add Census table B16001 for the jurisdiction(s) to the end of the plan for reference.*  See** [**Table B16001: Language Spoken at Home by Ability to Speak English**](https://data.census.gov/cedsci/table?q=B16001&tid=ACSDT1Y2019.B16001)**]**

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages): **[Use an “X” to indicate the frequency for each language encountered]**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Languages Spoken by LEP Persons** | **A few times a year  (12 or less days a year)** | **Several times a month (13 to 51 days a year)** | **At least once a week  (52 to 364 days a year)** | **Every day  (365 days a year)** |
| *Spanish* |  |  |  | X |
| *Chinese (incl. Mandarin, Cantonese)* |  | X |  |  |
| *Arabic* | X |  |  |  |
| *Korean* |  |  | X |  |
| *French* | X |  |  |  |
| […] |  |  |  |  |

**[*Add or delete lines, as needed*]**

[**If available and distinct from the LEP data above:** Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include: **[list below or write “none”]]**

|  |
| --- |
| **Additional Languages Spoken** |
| *Hindi* |
| *Portuguese* |
| […] |

***[Add or delete lines, as needed]***

This information is updated annually[[9]](#footnote-10) through checking the following resources:

|  |  |
| --- | --- |
| **Data Sources for Languages Spoken in Affected Community** | **Website link to Data Source** |
| *U.S. Census Bureau* | *https://data.census.gov/cedsci/table?q=B16001&tid=ACSDT1Y2019.B16001* |
| *Local public school data* | *www.example1.gov* |
| *Local housing and/or other assistance service data* | *www.example2.gov* |
| *Consultation with community centers* | *www.example3.gov* |
| *Consultation with Tribal Offices* | *www.example4.gov* |
| *Public health department* | *www.example5.gov* |
| *State demographics agency* | *www.example6.gov* |
| […] |  |

***[Add or delete lines, as needed]***

Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

|  |
| --- |
| **Description of Beneficiary Demographic Information Collection Methods** |
| * *Airport Customer Service Office conducts biannual surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.* * *Participants at small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.* * *Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information, submitted through a data collection website.* |

Staff and Advisory Board Diversity.

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures.

|  |
| --- |
| **Description of Employee and Advisory Board Demographic Information Collection Methods** |
| * *Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.* * *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through an online survey.* |

# 7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no **[Airport Sponsor]** activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.[[10]](#footnote-11)

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years: **[*List specific facilities in left column. For each facility, identify each Affected Community impacted by operation of the facility, or say “none”*]***.*

|  |  |
| --- | --- |
| **Existing Airport Facilities** | **Affected Community Impacted by Operation of the Facility** |
| *West Runway* | *West Village* |
| *Automated People Mover* | *Historic Heights* |
| *Maintenance Station* | *None* |
| *Central Terminal Area* | *None* |
| […] |  |

**[*Add or delete lines, as needed*]**

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years: **[*List specific facility projects in left column. For each facility project, identify each Affected Community impacted by operation of the facility, or say “none”. Consider all project alternatives.*]**

|  |  |
| --- | --- |
| **Airport Facility Construction Projects** | **Affected Community Impacted by Construction of the Facility** |
| *West Runway Extension Alternative 1* | *West Village* |
| *West Runway Extension Alternative 2* | *Historic Heights* |
| *Hangar Rehabilitation* | *None* |
| […] |  |

**[*Add or delete lines, as needed*]**

We have analyzed the above existing facilities and facility construction projects for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts: **[*List specific facilities and construction projects, and for each that has a disparate impact, identify the Affected Communities and if the potential disparate impact can be eliminated. If no facilities or construction projects have disparate impacts, write “none.”*].**

|  |  |  |
| --- | --- | --- |
| **Facilities or Construction Projects with Disparate Impacts** | **Affected Community Impacted** | **Impact Can Be Eliminated?** |
| *West Runway* | *West Village* | *Yes* |
| *West Runway Extension Alternative 1* | *West Village* | *No* |
| […] |  |  |

**[*Add or delete lines, as needed*]**

**Justifications:**

**[*Identify the justification for each existing facility or facility construction project with disparate impacts that cannot be eliminated. This step is only required for the Facilities or Construction Projects with Disparate Impacts where the impact is not eliminated (those with “No” in the right column, above). Note: You are required to provide a justification for proceeding with construction or use, not to cease construction or use. Alternatives and additional minimization, mitigation, or enhancements that were considered and rejected should be explained*.]**

|  |  |
| --- | --- |
| **Facilities or Construction Projects** | **Justification** |
| *Add project name.* | *Add justification.* |
| […] |  |

**[*Add or delete lines, as needed*]**

**[*Note: in analyzing the justification, consider: (1) To what extent does the program or activity expand opportunity; (2) If persons or businesses are to be displaced, relocated or adversely affected, whether the displacement will be equitably shared by the Affected Communities;***

***(3) The historical background of the program or activity over time, including its design, construction and/or modification; (4) Any related preexisting disadvantages impacting the Affected Community, and any action taken by the recipient or others to alleviate these disadvantages; and (5) An analysis of the comparative impacts of alternative approaches.*]**

# 8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the **[Airport Sponsor]** will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities **[*copy and paste from above; insert the languages that met the safe harbor threshold and languages that are frequently encountered*]**:

|  |
| --- |
| **Language** |
| *Spanish* |
| *Chinese (incl. Mandarin, Cantonese)* |
| *Tagalog (incl. Filipino)* |
| *Vietnamese* |
| *Arabic* |
| *Korean* |
| *French* |
| *Hindi* |
| *Portuguese* |
| […] |

[*Add or delete lines, as needed*]

**[Airport Sponsor]** alsocollects data for languages spoken by airport guests.[[11]](#footnote-12) Data sources include:

|  |  |
| --- | --- |
| **Data Sources for Languages Spoken by Airport Guests** | **Website link to Data Source** |
| *Airport language line usage data* | *www.languageline.com* |
| *Airline-provided data* | *N/A* |
| *Assumption from flight origin / destination* | *N/A* |
| *Assistance requests to airport information desks* | *N/A* |
| […] |  |

***[Add or delete lines, as needed]***

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests: **[*list below or write “none”]***

|  |
| --- |
| **Language** |
| *Russian* |
| *Bengali* |
| […] |

[*Add or delete lines, as needed*]

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the **[Airport Sponsor]** of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

**Translation Services:**

* All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
* The following vendors have been identified for written translations: **[*list below or write “none”* ]**

|  |  |
| --- | --- |
| **Translation Vendors** | **Languages** |
| *Universal Document Translator, Inc.* | *All above languages* |
| […] |  |

[Add or delete lines, as needed]

* Information regarding translation services can be obtained at: **[*identify online and in-person resources, including locations in pre- and post-security screening areas, such as security desks, public information counters, and terminal services officers, or write “none.”*]**

|  |  |
| --- | --- |
| **Location for Translation Assistance** | **Languages** |
| *Airport website request form* | *All above languages* |
| *Airport website translate view* | *Spanish* |
| *Volunteer multi-lingual staff pool* | *Spanish, Portuguese* |
| […] |  |

**[*Add or delete lines, as needed*]**

**Interpretation Services:**

* The following vendors have been identified for interpretation services: **[*list below or write “none”* ]**

|  |  |
| --- | --- |
| **Interpretation Vendors** | **Languages** |
| *Language Line, Inc.* | *All above languages* |
| […] |  |

[Add or delete lines, as needed]

* Information regarding interpretation services can be obtained at: **[*identify online and in-person resources, including locations in pre- and post-security screening areas, such as security desks, public information counters, and terminal services officers, or write “none.”*]**

|  |  |
| --- | --- |
| **Location for Interpretation Assistance** | **Languages** |
| *Airport Language Assistance page* | *All above languages* |
| *Airport information desks* | *All above languages, using Language Line, Inc.* |
| […] |  |

**[*Add or delete lines, as needed*]**

|  |
| --- |
| **Description of Interpretation Assistance Processes** |
| * *Airport Customer Service Office maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated annually in the Public Information Handbook and provided to all airport employees. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.* * *The airport contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contacts Language Line, Inc. and “parks” the request in the queue for the appropriate language. Language Line, Inc. operators will coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is then logged in the Language Line Service binder. This log is kept for one year.* |

**[If applicable:** “*Detailed information is available in the Language Assistance plan.*”**]**

# 9. Transportation

49 Part CFR 21 Appendix C (a)(1)(ix)

In the Community Statistics section of this plan, we identified Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

We have coordinated with **[local transit authority or authorities or planning entities]** to encourage them to provide transit service access between the airport and these areas.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas.

|  |  |  |
| --- | --- | --- |
| **Minority and/or Disadvantaged Community Areas** | **Transit Service** | **Planned or Existing** |
| [Insert Community Name] | Fixed-route buses | Existing |
| [Insert Community Name] | Paratransit vans | Planned |
| […] |  |  |

[*Add or delete lines, as needed*]

# 10. Minority Businesses

49 CFR 21 Appendix C (a)(1)(x)

Bids for airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

|  |  |
| --- | --- |
| **Airport Business Opportunity** | **Minority Business Outreach Methods** |
| *Shuttle Vehicle Maintenance Contract* | *Advertised through all local chambers of commerce, minority and woman owned business outreach email list* |
| *Parking Lot Operations Contract* | *Followed procedures for State Minority and Woman Owned Business Enterprise Program* |
| *Groundskeeper Contract* | *Bids required to include disadvantaged business mentor component for sub-contractors* |
| […] |  |

[*Add or delete lines, as needed*]

Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and documentation for specific bid decisions is kept with **[*Identify Responsible Office].***

# 11. Training

New employee orientation incorporates Title VI training. Topics include:

* Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
* Title VI complaints must be forwarded to the Coordinator
* Protections against retaliation for filing civil rights complaints or related actions
* Title VI notices must be displayed throughout the airport public facilities
* All contracts must include Title VI clauses
* Language interpretation and translation services
* Cultural and community relations sensitivity training
* Anti-harassment training

Refresher information will be provided [*specify interval, for example “annually”].*

# 12. Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations

FAA Notification. The Coordinator will notify FAA of any pending investigations and reviews, including:

* Compliance reviews or audits concerning civil rights requirements[[12]](#footnote-13)
* Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements[[13]](#footnote-14)

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, **[Airport Sponsor]** must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Coordinator will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within 5 years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

# 13. Title VI Complaints

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

Scope. These procedures are for complaints of discrimination under Title VI and related laws (hereafter “Title VI Complaints.” In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters**[[14]](#footnote-15)**
3. Allege misconduct by the **[Airport Sponsor] [*add: “or its sub-recipients” if applicable*],** including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the **[Airport Sponsor]** including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the **[Airport Sponsor]**.[[15]](#footnote-16) Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to **[*List the internal offices that should receive copies, this should include the office named in the complaint and the Airport Director*]**.

Complaints must be filed within **[*reasonable number, preferably* *180*]** days of the discriminatory event, must be in writing, and must be delivered to:

**[Name and Title of Title VI Coordinator]**

**[Address, Phone Number, and Email]**

If a complaint is initially made by phone, it must be supplemented with a written complaint before **[*reasonable number, preferably 180*]** days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

Initial Procedure. The Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Coordinator will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

**Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within ***[# of days or hours*]**.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will **[*describe contacts and process – it is preferred for the information to be uploaded to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff*]**.The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

**Investigation Procedure**

Assignment of Investigator. The Coordinator will immediately begin the investigation or designate an investigator.

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against **[Airport Recipient]**, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within **[*reasonable number, preferably 60*]** calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

Investigation Report. After completing the investigation, the Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Coordinator will consult with Legal Counsel regarding the investigation and the report. Airport Legal Counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through **[*list your airports means for resolving issues, such as alternate dispute resolution, negotiation, and/or mediation*]**.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state **[Airport Recipient]**’sconclusion regarding whether unlawful discrimination occurred, and will describe the complainant’s appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via **[*preferably the FAA Civil Rights Connect System*]**.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

* The complainant may appeal in writing to the **[Airport’s Executive Director].**
* The written appeal must be received **within [reasonable number]** business days after receipt of the written decision.
* The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
* The **[Executive Director]** will issue a final written decision in response to the appeal.

Avoiding Future Discrimination. In addition to taking action with respect to any specific instances of discrimination, the **[Airport Recipient]** will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **[Airport Recipient]** employees, contractors, and tenants will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

For information on filing a complaint with DOT/FAA, please contact **[Title VI Coordinator]**.

This complaint procedure is shared with the public through the following methods:

|  |
| --- |
| **Website, In-person, and Other Distribution Methods** |
| **1** *Airport website, Title VI page at www.localairport.gov/civilrights* |
| **2**[…] |

**[*Add or delete lines, as needed*]**

# 14. Population / Language Data

**[Insert the full B16001 and S1701 tables for your area from** [**www.census.gov**](http://www.census.gov)**]**

# 15. Completed Unlawful Discrimination Poster

**[Fill out poster template from** [**https://www.faa.gov/about/office\_org/headquarters\_offices/acr/com\_civ\_support/non\_disc\_pr/**](https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/)**]**

1. This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics. [↑](#footnote-ref-2)
2. For more information about website accessibility, please visit ADA.gov. [↑](#footnote-ref-3)
3. We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term “protected communities” is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898. [↑](#footnote-ref-4)
4. “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path. [↑](#footnote-ref-5)
5. Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low income communities in airport programs and activities. [↑](#footnote-ref-6)
6. Recommend using demographic groups from the U.S. Census. [↑](#footnote-ref-7)
7. Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold. [↑](#footnote-ref-8)
8. See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations. [↑](#footnote-ref-9)
9. Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period. [↑](#footnote-ref-10)
10. In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons. [↑](#footnote-ref-11)
11. We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met. [↑](#footnote-ref-12)
12. Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency. [↑](#footnote-ref-13)
13. Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws. [↑](#footnote-ref-14)
14. Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA. [↑](#footnote-ref-15)
15. [↑](#footnote-ref-16)