# Grand Forks Regional Airport Authority Title VI Plan

# 1. Title VI Policy Statement<sup>1</sup>

Grand Forks Regional Airport Authority (hereinafter, may be referred to as "GFRAA") 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.

The GFRAA 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. GFRAA 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 will take action to involve them and the general public in the decision-making process.

The GFRAA 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 the airport and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

The Director of Operations and Maintenance available at 701-738-4644 and info@gfkairport.com, 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

Ryan Riesinger

**Executive Director** 

7/8/24

**Effective Date** 

7/8/27

3-Year Expiration Date

<sup>&</sup>lt;sup>1</sup> This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

# 2. Administration

The Grand Forks Regional Airport Authority Board of Commissioners (Airport Authority Board) has reviewed and adopted this Title VI Plan for GFRAA. 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's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Airport Authority Board 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:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
Director of Finance & Administration	Airport Administration

GFRAA has the following airport program sub-recipients: *none* 

As of the date of this plan GFRAA has the following unclosed applications for Federal financial assistance:

Federal Source	Grant Number	Amount
FAA	3380022055-2020	\$ 9,464,300.00
FAA	3380022056-2021	\$ 1,430,987.00
FAA	3380022058-2021	\$ 7,201,820.00
FAA	3380022059-2022	\$ 1,969,936.00
FAA	3380022061-2022	\$ 6,750,200.00
FAA	3380022062-2022	\$ 1,741,022.00
FAA	3380022063-2022	\$ 1,467,085.00
FAA	3380022064-2022	\$ 16,290,690.00
FAA	3380022065-2022	\$ 9,391,274.00
FAA	3380022066-2023	\$ 14,284,720.00

Updated information for pending and awarded grant applications will be available through the following methods:

Federal Source	Grant Award Information Available at:
FAA AIP	https://www.faa.gov/airports/aip/

# 3. Grant and Procurement Assurances

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

GFRAA will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See <a href="https://www.faa.gov/airports/aip/grant\_assurances/#current-assurances">https://www.faa.gov/airports/aip/grant\_assurances/#current-assurances</a>.

#### Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See <a href="https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/">https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/</a>. 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.
- b. GFRAA requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements signed after the effective date of this plan.

## **Description of Oversight Methods for Subcontracts**

The Airport will require, upon the effective date of this plan, that all new leases, contracts, or any other type of agreement will contain direct reference to Title VI compliance. Any existing leases, contracts, or other types of agreements will have the language added when renewed (if applicable. The Title VI Coordinator will be responsible for coordinating with Airport Administration and ensuring new leases and contracts include the necessary reference to Title VI compliance.

[Name of other party contracting with Grand Forks Regional Airport Authority], for itself, its agents, employees, subcontractors, and successors, agrees to abide by and comply with all provisions and regulations of Title VI of the Civil Rights Act of 1964, and as said regulations and law may be amended. No person on the grounds of race, color, or national origin may be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination by [Name of other party contracting with Grand Forks Regional Airport Authority], its agents, employees, subcontractors, and successors. In the event of noncompliance with this nondiscrimination provision, Grand Forks Regional Airport Authority has the right to terminate this Agreement.

The airport will review not less that 10% of contractors each year to ensure they include language with their subcontractors that require compliance with Title VI.

# 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 GFRAA 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 GFRAA'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 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 requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<a href="https://faa.civilrightsconnect.com/">https://faa.civilrightsconnect.com/</a>).

# 5. Notice

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

GFRAA will conspicuously display the FAA-provided Unlawful Discrimination Poster in readily accessible, and reasonable public areas on airport property. The Coordinator ensures that these posters are visible, accessible, and maintained. The poster template is available at <a href="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/</a> and a completed copy is attached. See Section 15 Appendix.

GFRAA has posted the above Title VI policy statement at its staff offices.

GFRAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed within 60 days of the effective date via email to each tenant's primary point-of-contact.

Posters are displayed in the terminal and other areas on airport property, including the following public locations:

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal Ticketing Area/Bag Claim	<u> </u>	$N\!/\!A$	
Terminal Sterile Area	N/A	1	
Terminal Security Checkpoint	1	N/A	

#### Outreach to Affected Communities

The Airport Administration 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, local newspapers, and Airport website. The Airport Administration Office attempts to contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> 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.

GFRAA will create a detailed CPP within 60 days of the effective date of this plan. A copy of

<sup>&</sup>lt;sup>2</sup> For more information about website accessibility, please visit ADA.gov.

<sup>&</sup>lt;sup>3</sup> 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.

the plan will be available at www.gfkairport.com/documents

To ensure that the community is effectively informed of and able to participate in public hearings, the Airport Administration Office will ensure public notices are 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) upon request. An interpreter will be provided, when requested 3 business days in advance, free of charge, for public hearings for those languages identified in the Limited English Proficiency (LEP) Section of this plan.

# 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 GFRAA will be able to identify, understand, and engage with communities. In doing so, the GFRAA needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by GFRAA's airport program.

Affected Communities <sup>4</sup>	Population
Grand Forks ND	54,971
East Grand Forks MN	9,058
Grand Forks AFB ND	1,856
Manvel ND	414
Thompson ND	1,045

(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<sup>5</sup>.

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," GFRAA has collected information about affected and potentially affected low-income communities. According to U.S. Census data, the overall poverty level for the Grand Forks/East Grand Forks Metropolitan Statistical Area is approximately 12.5 %. The poverty rate remains similar compared with the rest of the State of North Dakota. The poverty rates for the specific Affected Communities are as

<sup>&</sup>lt;sup>4</sup> "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.

<sup>&</sup>lt;sup>5</sup> 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.

follows:

Affected Communities	Poverty Rate
Grand Forks ND	16.4%
East Grand Forks MN	10.2%
Grand Forks AFB ND	6.6%
Manvel ND	5.1%
Thompson ND	1.1%

# 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:

Affected Community: <u>Grand Forks ND</u>
Total Affected Community Population: 54.971

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	45020	81.90%
Black or African American	2443	4.44%
American Indian or Alaska Native	1174	2.14%
Asian	1,811	3.29%
Native Hawaiian or Other Pacific Islander	322	0.59%
Hispanic or Latino	2779	5.06%
More than one	3123	5.68%
Other	1078	1.96%

Affected Community: East Grand Forks MN Total Affected Community Population: 9058

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	7,632	84.26%
Black or African American	394	4.35%
American Indian or Alaska Native	234	2.58%
Asian	13	0.14%
Native Hawaiian or Other Pacific Islander	0	0.00%
Hispanic or Latino	650	7.18%

More than one	577	6.37%	
Other	208	2.30%	

Affected Community: Grand Forks AFB ND Total Affected Community Population: 1856

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,436	77.4%
Black or African American	88	4.7%
American Indian or Alaska Native	4	0.2%
Asian	70	3.8%
Native Hawaiian or Other Pacific Islander	9	0.5%
Hispanic or Latino	283	15.2%
More than one	181	9.8%
Other	68	3.7%

Affected Community: Manvel ND
Total Affected Community Population: 414

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	391	94.44%
Black or African American	0	0.00%
American Indian or Alaska Native	3	0.72%
Asian	5	1.21%
Native Hawaiian or Other Pacific Islander	0	0.00%
Hispanic or Latino	9	2.17%
More than one	15	3.62%
Other Andrews Control of the Control	0	0.00%

Affected Community: Thompson ND Total Affected Community Population: 1,045

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1014	97.03%
Black or African American	0	0.00%
American Indian or Alaska Native	22	2.11%
Asian	0	0.00%
Native Hawaiian or Other Pacific Islander	. 0	0.00%
Hispanic or Latino	14	1.34%
More than one	9	0.86%

Other 0	).00%
Limited English Proficiency (LEP)	

The goal of all language access planning and implementation is to ensure that GFRAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages that are spoken in LEP households in the Affected Communities. The data source is the US Census Bureau using date from the "Speaks English less than very well" category.

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.<sup>6</sup> The safe harbor for our community is 1000. Please refer to the end of this document to find data for all languages in our community. The Grand Forks, ND-MN Metropolitan Statistical Area as per the US Census Bureau 2022 ACS was used to calculate the LEP data.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	2392	+/-368

Frequency of contact with LEP individuals at the airport and airport-related activities (all Safe Harbor languages):

Languages Spoken by LEP Pe	ersons A few times	a Several times	At least once	Every day
	year	a month	a week	(365 days a
	(12 or less	(13 to 51 days	(52 to 364	year)
	days a year	') a year)	days a year)	
Spanish		X		

<sup>&</sup>lt;sup>6</sup> See the DOT LEP Policy Guidance at <a href="https://www.federalregister.gov/d/05-23972/p-133">https://www.federalregister.gov/d/05-23972/p-133</a>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

This information is updated annually 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=B1600 1&tid=ACSDT1Y2019.B16001

#### Beneficiary Diversity.

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

# **Description of Beneficiary Demographic Information Collection Methods**

- Airport Administration 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.
- Newly appointed board members will be asked to voluntarily provide demographic information to airport administration.

<sup>&</sup>lt;sup>7</sup> 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.

# 7. Potential or Known Community Impacts

No GFRAA 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.<sup>8</sup>

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility		
RWY 35L/17R	Grand Forks, East Grand Forks, Grand Forks AFB, Manville, Thompson		
RWY 9L/27R	Grand Forks, East Grand Forks, Grand Forks AFB, Manville, Thompson		
RWY 35R/17L	Grand Forks, East Grand Forks, Grand Forks AFB, Manville, Thompson		
RWY 9R/27L	Grand Forks, East Grand Forks, Grand Forks AFB, Manville, Thompson		
Terminal Building	None		
East GA Area	None		
Airport ARF/SRE Facility	None		
Cargo Facility	None		

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years:

<b>Airport Facility Construction Projects</b>	Affected Community Impacted by
	Construction of the Facility
9L Extension / 27R Reconstruction	Grand Forks, East Grand Forks, Grand Forks

<sup>&</sup>lt;sup>8</sup> 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.

	AFB, Manville, Thompson
35L/17R Reconstruction	Grand Forks, East Grand Forks, Grand Forks AFB, Manville, Thompson
FAA ATCT Construction	None

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:

Facilities or Construction Projects	Affected Community Impacted	Impact Can Be
with Disparate Impacts		Eliminated?
None	N/A	N/A

#### **Justifications:**

N/A

# 8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the GFRAA 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

Language
Spanish

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 GFRAA 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 airport administration staff will assist travelers by providing the following translation assistance when available by using Language Line translation services:

Location of Translation Assistance	Languages
Airport Administration (Business	Language Line Languages
hours)	

• Information regarding translation services can be obtained at www.gfkairport.com or the airport administration office Mon-Friday 8:00am-4:30pm.

#### **Interpretation Services:**

• The following vendors have been identified for interpretation services:

Interpretation Vendo	
Language Line	Spanish

• Information regarding interpretation services can be obtained at www.gfkairport.com or the Airport Administration Office.

## **Description of Interpretation Assistance Processes**

• 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 Administration 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.

# 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 the City of Grand Forks to encourage them to provide transit service access between the airport and these areas. Cities Area Transit (CAT) operates all public transit service routes in the Grand Forks area. The airport, as an Authority separate from all other local governments has no say as to what areas are served by CAT.

# 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
Food and Beverage Concessions	Review the Census Bureau Website at <a href="https://data.census.gov">https://data.census.gov</a> for minority and Women owned Businesses and inform local relevant companies of opportunities.
Parking Lot Operations	Utilize same methods above
Rental Car Operators	Utilize same methods above

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 Airport Administration.

# 11. Training

New employee orientation incorporates Title VI training and will be required of all new employees. Current employees will complete Title VI training within 12 month of the effective date of this plan. Training is completed and recorded through ANTN Digicast. 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 annually.

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

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

- Compliance reviews or audits concerning civil rights requirements<sup>9</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>10</sup>

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, GFRAA 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<sup>11</sup>
- 3. Allege misconduct by GFRAA including airport employees, contractors, concessionaires, lessees, or tenants.
- 4. Concern an airport facility or actions by the GFRAA including airport employees, contractors, concessionaires, lessees, or tenants.

<sup>9</sup> 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.

<sup>&</sup>lt;sup>10</sup> 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.

<sup>&</sup>lt;sup>11</sup> 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.

<u>Rights</u>. 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 GFRAA.<sup>12</sup> 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.

<u>Receipt of Complaint</u>. The Coordinator will log in the complaint and promptly send copies of the complaint to the office named in the complaint, the Airport's Executive Director.

Complaints must be filed within 90 days of the discriminatory event, must be in writing, and must be delivered to:

Grand Forks Regional Airport Authority ATTN: Title VI Coordinator 2301 Airport Dr Grand Forks, ND 58203

If a complaint is initially made by phone, it must be supplemented with a written complaint before 90 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.

<u>Initial Procedure.</u> 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**

<u>Internal Complaint Referral</u>. All Title VI complaints must be promptly forwarded to the Coordinator within 5 business days.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 business 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 upload all pertinent information to the FAA Civil Rights Connect System. Once successfully uploaded, this will constitute proper notification to the FAA. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

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#### **Investigation Procedure**

<u>Assignment of Investigator</u>. The Coordinator will immediately begin the investigation or designate an investigator.

<u>Cooperation with FAA</u>. 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 GFRAA the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

<u>Prompt Investigation</u>. The Coordinator will make every effort to complete discrimination complaint investigations within 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.

<u>Contact with Complainant.</u> 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.

<u>Investigation Report</u>. After completing the investigation, the Coordinator will prepare a written report.

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

<u>Prompt Resolution of Disputes</u>. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through negotiation, mediation, remediation, or other necessary remedies based upon the validity, nature, and severity of the complaint.

<u>Forwarding Report and Response to Complainant</u>. 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 GFRAA's conclusion 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 the FAA Civil Rights Connect System.

<u>Appeal Rights.</u> 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 30 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.

<u>Avoiding Future Discrimination</u>. In addition to taking action with respect to any specific instances of discrimination, the GFRAA will identify and implement measures to reduce the chances of similar discrimination in the future.

<u>Intimidation and Retaliation Prohibited</u>. GFRAA 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, www.gfkairport.com/documents

2Airport Administration Office, M-F 8am-4:30pm excluding holidays

# 14. Population / Language Data

Affected Communities Information Source US Census Bureau				
Affected Community	Population	Poverty Rate	# of People in Minority Group	% Total Affected Community in Minority Group
Grand Forks ND	54,971	16.4%	12730	23.16%
East Grand Forks MN	9,058	10.2%	2076	22.92%
Grand Forks AFB ND	1,856	6.6%	703	37.88%
Manvel ND	414	5.1%	32	7.24%
Thompson ND	1,045	1.1%	45	4.31%

Affected Community: <u>Grand Forks ND</u>
Total Affected Community Population: 54,971

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	45020	81.90%
Black or African American	2443	4.44%
American Indian or Alaska Native	1174	2.14%
Asian	1,811	3.29%
Native Hawaiian or Other Pacific Islander	322	0.59%
Hispanic or Latino	2779	5.06%
More than one	3123	5.68%
Other	1078	1.96%

Affected Community: East Grand Forks MN Total Affected Community Population: 9058

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	7,632	84.26%
Black or African American	394	4.35%
American Indian or Alaska Native	234	2.58%
Asian	13	0.14%
Native Hawaiian or Other Pacific Islander	0	0.00%
Hispanic or Latino	650	7.18%
More than one	577	6.37%
Other	208	2.30%

Affected Community: Grand Forks AFB ND Total Affected Community Population: 1856

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,436	77.4%
Black or African American	88	4.7%
American Indian or Alaska Native	4	0.2%
Asian	70	3.8%
Native Hawaiian or Other Pacific Islander	9	0.5%
Hispanic or Latino	283	15.2%
More than one	181	9.8%
Other	68	3.7%

Affected Community: Manvel ND Total Affected Community Population: 414

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	391	94.44%
Black or African American	0	0.00%
American Indian or Alaska Native	3	0.72%
Asian	5	1.21%
Native Hawaiian or Other Pacific Islander	0	0.00%
Hispanic or Latino	9	2.17%
More than one	15	3.62%
Other	0	0.00%

Affected Community: Thompson ND Total Affected Community Population: 1,045

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1014	97.03%
Black or African American	0	0.00%
American Indian or Alaska Native	22	2.11%
Asian	0	0.00%
Native Hawaiian or Other Pacific Islander	0	0.00%
Hispanic or Latino	14	1.34%
More than one	9	0.86%
Other	o	0.00%

	Grand Forks, ND-MN Metro Area		
Label	Estimate	Margin of Error	
Total:	93,948	±18	
Speak only English	87,738	±510	
Spanish	2,392	±368	
French (incl. Patois, Cajun):	196	±99	
French Creole:	2	±2	
Italian:	24	±18	
Portuguese or Portuguese			
Creole:	40	±23	
German:	452	±111	
Yiddish:	0	±27	
Other West Germanic			
languages:	72	±74	
Scandinavian languages:	215	±64	
Greek:	0	±27	
Russian:	255	±69	
Polish:	49	±41	
Serbo-Croatian:	52	±65	
Other Slavic languages:	88	±65	
Armenian:	0	±27	
Persian:	11	±13	
Gujarati:	17	±20	
Hindi:	53	±54	
Urdu:	26	±28	
Other Indic languages:	322	±215	
Other Indo-European			
languages:	8	±15	
Chinese:	340	±156	
Japanese:	78	±50	
Korean:	97	±44	
Mon-Khmer, Cambodian:	0	±27	
Hmong:	88	±84	
Thai:	10	±12	
Laotian:	0	±27	
Vietnamese:	12	±12	

Other Asian languages:	147	±115
Tagalog:	147	±75
Other Pacific Island		
languages:	5	±8
Navajo:	0	±27
Other Native North American		
languages:	66	±52
Hungarian:	20	±23
Arabic:	83	±87
Hebrew:	36	±50
African languages:	771	±290
Other and unspecified		
languages:	36	±27

# 15. Completed Unlawful Discrimination Poster

#### Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Airport Manager or:

> Federal Aviation Administration Office of Civil Rights, ACR-1 800 Independence Avenue, S.W. Washington, D.C. 20591

Federal regulations on unlawful discrimination are available for review in the Airport Manager's Office.

> Coordinator: Joey Castiglione Phone: 701-738-4644 Address: 2301 Airport Dr # 107 Grand Forks, ND 58203

#### Discriminacion Ilegal

Se prohibe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento físico o discapacidad en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán ser dirigidas inmediatamente al Administrador del Aeropuerto o a:

> Federal Aviation Administration Office of Civil Rights, ACR-1 800 Independence Avenue, S.W. Washington, D.C. 20591

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

> Coordinador: Joey Castiglione Teléfono: 701-738-4644 Dirección: 2301 Airport Dr #107 Grand Forks, ND 58203



U.S. Department of Transportation **Federal Aviation Administration**