# TRI-CITIES AIRPORT AUTHORITY Title VI Plan

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

**Tri-Cities Airport (TRI)** 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.

**TRI** assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. 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 **TRI** will take action to involve them and the general public in the decision-making process.

**TRI** 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 **TRI** and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

**Rebecca O'Quinn**, available at (**423**) **325-6003** and **roquinn@flytri.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.

Dasc Gene Cossey (Jan 3, 2025 06:54 EST)

Signature David E. Cossey President/CEO 11-01-2024 Effective Date

10-31-2027 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

**Tri-Cities Airport Authority (TCAA)** has reviewed and adopted this Title VI Plan for **Tri-Cities Airport.** 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 President/CEO's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the **Tri-Cities Airport 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:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
Rebecca O'Quinn	Human Resources Manager
Source: Airport staff	

**TRI** has the following airport program sub-recipients:

Sub-Recipients		
None		
Source: Airport staff		

As of the date of this plan, **TRI** has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
None		
Source: Airport staff		·

Source: Airport staff

In addition, **TRI** sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT):

Federal Source	Grant Number	Amount
None		

Source: Airport staff

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

Federal Source	Grant Award Information Available at:
None	
Source: Airport staff	

## **3. Grant and Procurement Assurances**

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

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

#### 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 <u>https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/</u>. 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.* **TRI** requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

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

Legal counsel reviews all airport contracts to ensure the appropriate clauses are listed in each agreement.

## 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 **TRI's** 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 requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<u>https://faa.civilrightsconnect.com/</u>).

## 5. Notice

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

**TRI** 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,<sup>2</sup> 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.

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

**TRI** will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by October 2<sup>nd</sup>, 2024 once approved by the FAA via email and hard copies, where applicable.

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

Posters will be displayed in each 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
Concourse		3	
Terminal	3		
FBO	1		

Source: Airport staff

#### Outreach to Affected Communities

**The Human Resources Department** 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, and **social media**. The **Human Resources Department** 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.

**TRI** will create a detailed CPP by **June 30<sup>th</sup>**, **2024**. A copy of the plan will be available at **www.flytri.com**.

To ensure that the community is effectively informed of and able to participate in public hearings, **The Human Resources Department** 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.

<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.

## **<u>6. Community Statistics</u>**

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

Population
13,662
13,541

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

(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," **TRI** is collecting information about affected and potentially affected low-income communities. According to **the** *U.S. Census Report*, *S1701: Poverty Status in the Past 12 Months*, the overall poverty level for Sullivan County is approximately *15.2* %. The poverty rate remains similar compared with the rest of the state of Tennessee (14.0%) The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
Blountville – Zip Code 37617	7.8%
Colonial Heights – Zip Code 37663	5.5%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

#### 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<sup>6</sup>:

<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.

<sup>&</sup>lt;sup>6</sup> Recommend using demographic groups from the U.S. Census.

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	22	0.2%
Asian alone	17	0.1%
Black or African American alone	44	0.3%
Hispanic or Latino origin (of any race)	144	1.1%
Native Hawaiian and Other Pacific Islander alone	0	0.0%
Some other race alone	60	0.4%
Two or more races	222	1.6%
White alone	13,297	97.3%

#### Affected Community: <u>Blountville – Zip Code 37617</u> Total Affected Community\_<u>13,662</u>

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

#### Affected Community: <u>Colonial Heights – Zip Code 37663</u> Total Affected Community\_13,541\_\_\_\_

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	4	0.0%
Asian alone	318	2.3%
Black or African American alone	30	0.2%
Hispanic or Latino origin (of any race)	245	1.8%
Native Hawaiian and Other Pacific Islander alone	0	0.0%
Some other race alone	110	0.8%
Two or more races	333	2.5%
White alone	12,746	94.1%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

## Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **TRI** communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>7</sup> that are spoken in LEP households in the Affected Communities. The data source is The American Community Survey.

The threshold we have used for identifying the languages with significant LEP populations is the

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

DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>8</sup> The safe harbor for Blountville (Zip Code 37617) is 683. The safe harbor for Colonial Heights (Zip Code 37663) is 677. 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
All Non-English Languages are below the		
threshold		

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

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

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	Х			

Source: Airport staff

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include:

	Additional Languages Spoken	
None		_

This information is updated annually<sup>9</sup> through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
U.S. Census Bureau	$\frac{\text{https://data.census.gov/table/ACSDT5Y2015.B16001?q=}}{\text{P16001} \text{gr}_{2} \text{P260} \text{V001} \text{gr}_{2} \text{P16001} \text{gr}_{2} \text{gr}_{2} \text{P16001} \text{gr}_{2} \text{P16001} \text{gr}_{2} $
	<u>B16001&amp;g=860XX00US37617,37663</u>

#### Beneficiary Diversity.

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

<sup>&</sup>lt;sup>8</sup> See the DOT LEP Policy Guidance at <u>https://www.federalregister.gov/d/05-23972/p-133</u>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

<sup>&</sup>lt;sup>9</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.

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

- 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.

## 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 **TRI** 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>10</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
Runway 05/23	None
Runway 09/27	None
Terminal/Concourse	None
Central Terminal Area	None
Rental Car Facility	None

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

Fuel Farm	None
Air Cargo Building	None
Airport Parking Lots	None
Comment Aliment staff	

Source: Airport staff

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

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
Employee/LT Lot Expansion	None
Taxiway A Extension/Taxiway C Removal	None
GA Box Hangar	None
Concourse Checkpoint Widening	None
Parking Lot Exit Plaza Replacement/ Long Term	None
Lot Rehab	
Terminal Building Improvements	None
Taxiway B Rehab/Taxiway Y Reconfiguration	None
Taxiway R1 Hangar Land Development	None
Source: Airport staff	

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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 with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
None	None	None

**Justifications:** 

<b>Facilities or Construction</b>	Justification
Projects	
Not Applicable	

## **8. Limited English Proficiency (LEP)** Executive Order 13166

In creating a Language Assistance Plan, **TRI** 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	
None	None	

**TRI** also collects data for languages spoken by airport guests.<sup>11</sup> Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
In port Odesis	Bource
Assistance requests to airport information desks	N/A

Based on the above data, the following <u>additional</u> languages have been identified as likely to be spoken by LEP airport guests:

	Language	
None		

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 **TRI** 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:

Translation Vendors	Languages
None	

• Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport Services Counter	Spanish

#### **Interpretation Services:**

• The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
· · · · · · · · · · · · · · · · · · ·	0 0

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

None

• Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages			
None				

#### **Description of Interpretation Assistance Processes**

• The airport services counter is staffed Monday through during normal business hours (9:00 a.m. to 5:00 p.m.). The individual that works the counter speaks Spanish and uses Google translate for any other languages assistance needs.

# 9. Transportation

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

Johnson City Transit, Kingsport Area Transit Service, Bristol Tennessee Transit and Bristol Virginia Transit do not currently provide service to the airport.

## **<u>10. Minority Businesses</u>**

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
Landscaping and Mowing	Advertised on the airport's website and through the local newspapers.
Contract	

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 **Human Resources**.

## **<u>11. Training</u>**

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 "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>12</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>13</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, **TRI** 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.

<sup>&</sup>lt;sup>12</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>13</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.

# **<u>13. Title VI Complaints</u>**

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

<u>Scope</u>. 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>14</sup>
- **3.** Allege misconduct by **TRI**, including airport employees, contractors, concessionaires, lessees, or tenants.
- 4. Concern an airport facility or actions by **TRI** including airport employees, contractors, concessionaires, lessees, or tenants.

<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 **TRI**.<sup>15</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 Airport President and CEO**.

Complaints must be filed **within 180 days** of the discriminatory event, must be in writing, and must be delivered to:

Rebecca O'Quinn, Human Resources Manager 2525 Highway 75, Suite 301 Blountville, TN 37617 (423) 325-6055 roquinn@flytri.com

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

<sup>&</sup>lt;sup>14</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>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**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within **7 days**.

<u>Initial FAA Notification</u>. 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 **upload the complaint information to the FAA Civil Rights Connect System.** The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

#### **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 **TRI** 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 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.

<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 the following clause listed in lease agreement: "In the event of a Lessee's noncompliance with the non-discrimination provisions of the contract, TCAA will impose such sanctions as it or the Federal Aviation Administration may determine to be appropriate, including, but not limited to cancelling, terminating, or suspending the agreement, in whole or in part."

<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 **TRI'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 President and CEO.
- The written appeal must be received **within 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 Airport's President and CEO 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, **TRI** will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **TRI** 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 Rebecca O'Quinn.

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, https://flytri.com

# **<u>14. Population / Language Data</u>**

# S1701: Poverty Status in the Past 12 Months

			ZCTA	5 37617		
	Т	otal	Below po	verty level	Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	13,662	±1,237	1,064	±329	7.8%	±2.4
AGE						
Under 18 years	2,489	±467	318	±161	12.8%	±6.8
Under 5 years	650	±200	73	±67	11.2%	±9.5
5 to 17 years	1,839	±387	245	±138	13.3%	$\pm 7.8$
Related children of householder under 18 years	2,489	±467	318	±161	12.8%	±6.8
18 to 64 years	8,168	±821	564	±195	6.9%	±2.4
18 to 34 years	2,370	±424	214	±115	9.0%	±4.7
35 to 64 years	5,798	±608	350	±154	6.0%	±2.6
60 years and over	4,026	±466	240	±93	6.0%	±2.4
65 years and over	3,005	±404	182	±81	6.1%	±2.8
SEX						
Male	6,634	±669	458	±170	6.9%	±2.6
Female	7,028	±676	606	±216	8.6%	±3.1
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	13,297	±1,206	1,013	±307	7.6%	±2.3
Black or African American alone	44	±64	0	±21	0.0%	±51.1
American Indian and Alaska Native alone	22	±19	0	±21	0.0%	±72.3
Asian alone	17	±28	0	±21	0.0%	±82.3
Native Hawaiian and Other Pacific Islander alone	0	±21	0	±21	-	**
Some other race alone	60	±76	48	±73	80.0%	±39.6
Two or more races	222	±121	3	±6	1.4%	±3.0
Hispanic or Latino origin (of any race)	144	±98	92	±85	63.9%	±25.1
White alone, not Hispanic or Latino	13,223	±1,204	969	±300	7.3%	±2.3

EDUCATIONAL						
ATTAINMENT						
Population 25 years and						
over	10,537	±819	743	±234	7.1%	±2.2
Less than high	,					
school graduate	1,205	±296	182	±114	15.1%	±9.1
	1,205	±290	102	<u>_114</u>	13.170	<u> </u>
High school graduate	0.005	10.1	212	104	6.604	2.6
(includes equivalency)	3,235	±494	212	±124	6.6%	±3.6
Some college,						
associate's degree	2,942	±440	204	±95	6.9%	±3.1
Bachelor's degree or						
higher	3,155	±469	145	±96	4.6%	±2.9
EMPLOYMENT						
STATUS						
Civilian labor force 16						
years and over	7,039	±791	311	±125	4.4%	±1.8
Employed	6,543	±706	214	±102	3.3%	±1.6
Male	3,443	±394	120	±83	3.5%	±2.4
Female	3,100	±454	94	±62	3.0%	±2.0
Unemployed	496	±237	97	±62	19.6%	±13.9
1 2						
Male	271	±149	33	±39	12.2%	±15.4
Female	225	±135	64	±53	28.4%	±25.4
WORK EXPERIENCE						
Population 16 years and						
over	11,413	±932	746	±233	6.5%	±2.1
Worked full-time,						
year-round in the past 12	1.1.00	<b>5</b> 0 £	10	21	0.404	0.7
months	4,468	±536	19	±31	0.4%	±0.7
Worked part-time or						
part-year in the past 12	2 704	. 402	200	. 110	11.00/	. 1 2
months	2,704	±492	298	±119	11.0%	±4.3
Did not work	4,241	±447	429	±158	10.1%	±3.7
ALL INDIVIDUALS						
WITH INCOME BELOW						
THE FOLLOWING						
POVERTY RATIOS						
50 percent of poverty level	439	±201				
125 percent of poverty	437	±201	(X)	(X)	(X)	(X)
level	1,421	±384	(X)	(X)	(X)	(X)
150 percent of poverty	1,421	304	(A)		(A)	(A)
level	2,409	±555	(X)	(X)	(X)	(X)
185 percent of poverty	2,407	-333	(A)		(4)	(1)
level	2,976	±582	(X)	(X)	(X)	(X)
200 percent of poverty	2,770		(4)		(4)	
level	3,385	±612	(X)	(X)	(X)	(X)
level	3,383	±012	(A)	(A)	$(\Lambda)$	(A)

300 percent of poverty						
level	6,048	±909	(X)	(X)	(X)	(X)
400 percent of poverty	0,010		(12)	()	(12)	(12)
level	8,496	±1,154	(X)	(X)	(X)	(X)
500 percent of poverty						
level	10,499	±1,201	(X)	(X)	(X)	(X)
UNRELATED						
INDIVIDUALS FOR						
WHOM POVERTY						
STATUS IS	2 001	. 214	105	. 1.5.2	20.40/	
DETERMINED	2,081	±314	425	±153	20.4%	±6.4
Male	971	±227	228	±112	23.5%	±9.6
Female	1,110	±212	197	±86	17.7%	±8.1
15 years	0	±21	0	±21	-	**
16 to 17 years	0	±21	0	±21	-	**
18 to 24 years	60	±61	3	±6	5.0%	±13.6
25 to 34 years	260	±134	95	±85	36.5%	±26.1
35 to 44 years	233	±114	23	±25	9.9%	±10.1
45 to 54 years	264	±125	36	±33	13.6%	±12.4
55 to 64 years	513	±180	164	±95	32.0%	±13.7
65 to 74 years	367	±129	46	±42	12.5%	±12.0
75 years and over	384	±106	58	±42	15.1%	±11.1
Mean income deficit for						
unrelated individuals						
(dollars)	7,969	±1,874	(X)	(X)	(X)	(X)
Worked full-time, year-						
round in the past 12 months	642	±178	0	±21	0.0%	±6.4
Worked less than full-						
time, year-round in the past	<b>-</b>					
12 months	585	±203	172	±94	29.4%	±13.5
Did not work	854	±190	253	±116	29.6%	±10.2
Population in housing						
units for whom poverty						
status is determined	13,622	±1,237	1,055	±329	7.7%	±2.4

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

	ZCTA5 3'	7663				
	Total		Below pov	verty level	Percent b poverty leve	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is	12 5 4 1	.1.100	720		5.50	.10
determined AGE	13,541	±1,180	738	±274	5.5%	±1.9
Under 18 years	2,238	±514	146	±110	6.5%	±4.6
Under 5 years	551	±223	82	±76	14.9%	±12.5
5 to 17 years	1,687	±397	64	±50	3.8%	±2.9
Related children of householder under 18 years	2,225	±511	146	±110	6.6%	±4.6
18 to 64 years	7,962	±815	434	±172	5.5%	±2.1
18 to 34 years	2,656	±502	142	$\pm 80$	5.3%	±3.0
35 to 64 years	5,306	±553	292	±128	5.5%	±2.4
60 years and over	4,659	±490	244	±106	5.2%	±2.2
65 years and over	3,341	±368	158	±87	4.7%	±2.5
SEX	5,541	1.500	150	107	<b>ч.</b> 770	-2.3
Male	6,699	±627	273	±108	4.1%	±1.6
Female	6,842	±659	465	±191	6.8%	±2.6
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	12,746	±1,216	673	±267	5.3%	±2.0
Black or African American alone	30	±30	6	±7	20.0%	±27.5
American Indian and Alaska	4	±8	0	±21	0.0%	±100.0
Native alone Asian alone	318	±0 ±242	0	$\pm 21$ $\pm 21$	0.0%	$\pm 100.0$ $\pm 12.5$
Native Hawaiian and Other Pacific					0.0%	
Islander alone	0	±21	0	±21	-	**
Some other race	110	. 00	1		0.00/	.25
alone	110	±88	1	±3	0.9%	±3.5
Two or more races	333	±246	58	±81	17.4%	±25.0
Hispanic or Latino origin (of				-01	17.T/U	<u> </u>
any race)	245	±221	3	±6	1.2%	±2.6

White slame not						
White alone, not						
Hispanic or	12 710	1 2 1 2	671	1267	5 20/	120
Latino EDUCATIONAL	12,710	±1,212	671	±267	5.3%	±2.0
ATTAINMENT						
Population 25						
years and over	10,329	±713	564	±213	5.5%	±2.0
	10,329	±/13	504	±213	5.570	±2.0
Less than high		• • • •	0.5	-	4.4.994	10.0
school graduate	600	±209	86	±59	14.3%	±10.2
High school						
graduate (includes						
equivalency)	2,902	±439	318	±123	11.0%	±4.2
	2,902	±439	510	±123	11.0%	±4.2
Some college,	2.20.6	405	107		2.201	
associate's degree	3,396	±405	107	±80	3.2%	±2.3
Bachelor's degree	2 421	. 501	52	. 1.1	1.50/	.1.2
or higher	3,431	±501	53	±44	1.5%	±1.3
EMPLOYMENT						
STATUS Civilian labor						
force 16 years						
and over	6,902	±818	199	±136	2.9%	±2.0
	6,566	±776	199	±130 ±131	2.9%	±2.0 ±2.0
Employed	-					
Male	3,510	±467	86	±65	2.5%	±1.8
Female	3,056	±419	95	±88	3.1%	±2.8
Unemployed	336	±168	18	±21	5.4%	±6.9
Male	170	±76	10	±16	5.9%	±10.4
Female	166	±123	8	±14	4.8%	±9.6
WORK						
EXPERIENCE						
Population 16						
years and over	11,625	±853	596	±208	5.1%	±1.7
Worked full-						
time, year-round						
in the past 12	5 20 5		105	100	0.504	
months	5,306	±657	137	±123	2.6%	±2.3
Worked part-time						
or part-year in the past 12						
months	1,960	±376	80	±58	4.1%	±3.0
Did not work		±370 ±482	379			
ALL	4,359	±402	319	±153	8.7%	±3.2
INDIVIDUALS						
WITH INCOME						
BELOW THE						
FOLLOWING						
POVERTY						
RATIOS						
	1		1	1	1	

	1	1	1			
50 percent of poverty level	201	±106	(X)	(X)	$(\mathbf{V})$	<b>(V</b> )
125 percent of	201	±100	(A)	(A)	(X)	(X)
poverty level	1,129	±367	(X)	(X)	(X)	(X)
150 percent of	1,12)	2501	(11)	(11)	(11)	(21)
poverty level	1,638	±430	(X)	(X)	(X)	(X)
185 percent of	7					
poverty level	2,191	±489	(X)	(X)	(X)	(X)
200 percent of						
poverty level	2,259	±496	(X)	(X)	(X)	(X)
300 percent of						
poverty level	4,952	±821	(X)	(X)	(X)	(X)
400 percent of	7.012	.1.004				
poverty level	7,913	±1,004	(X)	(X)	(X)	(X)
500 percent of poverty level	10,013	±1,131	(X)	(X)	(X)	(X)
UNRELATED	10,015	±1,151	(A)	(A)	(A)	(A)
INDIVIDUALS						
FOR WHOM						
POVERTY						
STATUS IS						
DETERMINED	2,614	±456	355	±153	13.6%	±5.4
Male	1,295	±312	97	±62	7.5%	±4.8
Female	1,319	±292	258	±119	19.6%	±8.0
15 years	0	±21	0	±21	-	**
16 to 17 years	0	±21	0	±21	-	**
18 to 24 years	59	±48	28	±36	47.5%	±41.2
25 to 34 years	474	±270	31	±30	6.5%	±7.6
35 to 44 years	126	±83	11	±13	8.7%	±10.4
45 to 54 years	379	±191	45	±43	11.9%	±11.1
55 to 64 years	314	±110	92	±66	29.3%	±17.9
65 to 74 years	558	±187	30	±29	5.4%	±5.5
75 years and over	704	±187	118	±82	16.8%	±10.2
Mean income	,,,,		110		10.070	-10.2
deficit for						
unrelated						
individuals						
(dollars)	6,417	±1,408	(X)	(X)	(X)	(X)
Worked full-						
time, year-round						
in the past 12	1 1 4 4	. 224	16	. 25	1 40/	
months We dead here there	1,144	±334	16	±25	1.4%	±2.2
Worked less than						
full-time, year- round in the past						
12 months	160	±76	72	±56	45.0%	±22.4
Did not work	1,310	±70 ±296	267	±142	20.4%	±22.4 ±9.5
DIG HOL WOLK	1,310	±∠90	207	±142	20.4%	エフ.J

Population in housing units for						
whom poverty						
status is						
determined	13,513	$\pm 1,181$	719	±274	5.3%	±1.9

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

# S16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

	ZCTA5 3' harbor = 68	7617 (Safe 3)	ZCTA5 3' harbor = 67'	7663 (Safe 7)
Label	Estimate	Margin of Error	Estimate	Margin of Error
Total:	12,874	±712	14,162	±765
Speak only English	12,651	±732	13,886	±798
Spanish or Spanish Creole:	133	±119	96	±68
Speak English "very well"	82	±82	88	±64
Speak English less than "very well"	51	±56	8	±10
French (incl. Patois, Cajun):	0	±19	10	±17
Speak English "very well"	0	±19	3	±5
Speak English less than "very well"	0	±19	7	±12
French Creole:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Italian:	0	±19	69	±79
Speak English "very well"	0	±19	69	±79
Speak English less than "very well"	0	±19	0	±19
Portuguese or Portuguese Creole:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
German:	15	±24	23	±28
Speak English "very well"	15	±24	23	±28
Speak English less than "very well"	0	±19	0	±19
Yiddish:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19

Speak English less than				
"very well"	0	±19	0	±19
Other West Germanic languages:	25	±42	0	±19
Speak English "very well"	25	±42	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Scandinavian languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Greek:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Russian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Polish:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Serbo-Croatian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Other Slavic languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Armenian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Persian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Gujarati:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Hindi:	0	±19	0	±19

Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Urdu:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Other Indic languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Other Indo-European				1.0
languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Chinese:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Japanese:	13	±22	0	±19
Speak English "very well"	13	±22	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Korean:	9	±14	44	±50
Speak English "very well"	9	±14	18	±20
Speak English less than "very well"	0	±19	26	±31
Mon-Khmer, Cambodian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Hmong:	0	±19 ±19	0	±19 ±19
Speak English "very well"	0	±19 ±19	0	±19 ±19
		<u> </u>	0	<u>_1</u> /
Speak English less than "very well"	0	±19	0	±19
Thai:	0	±19 ±19	0	±19 ±19
Speak English "very well"	0	±19 ±19	0	±19 ±19
		<u> </u>	0	<u>-1</u> /
Speak English less than "very well"	0	±19	0	±19
Laotian:	0	±19 ±19	0	±19 ±19
Speak English "very well"	0	±19 ±19	0	±19 ±19
		<u> </u>	0	<u>-1</u> /
Speak English less than "very well"	0	±19	0	±19

Vietnamese:	28	±38	9	±19
Speak English "very well"	20	±34	9	±19
Speak English less than				
"very well"	8	±14	0	±19
Other Asian languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Tagalog:	0	±19	14	±21
Speak English "very well"	0	±19	14	±21
Speak English less than "very well"	0	±19	0	±19
Other Pacific Island				
languages:	0	±19	11	±18
Speak English "very well"	0	±19	11	±18
Speak English less than "very well"	0	±19	0	±19
Navajo:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Other Native North				
American languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Hungarian:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Arabic:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19
Hebrew:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
African languages:	0	±19	0	±19
Speak English "very well"	0	±19	0	±19
Speak English less than "very well"	0	±19	0	±19
Other and unspecified languages:	0	±19	0	±19

Speak English "very well"	0	±19	0	±19
Speak English less than				
"very well"	0	±19	0	±19

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

## **15. Completed Unlawful Discrimination Poster**

