



COLUMBUS REGIONAL AIRPORT AUTHORITY

TITLE VI PROGRAM

January 2023

TABLE OF CONTENTS

I. POLICY STATEMENT..... 3

II. STANDARD ASSURANCES..... 4

III. ORGANIZATIONAL STAFFING AND RESPONSIBILITIES 4

IV. DISCRIMINATION COMPLAINT GUIDELINES AND PROCEDURES 5

V. LANGUAGE ASSISTANCE PROGRAM AND PLAN..... 8

VI. ENVIRONMENTAL JUSTICE 11

VII. NONDISCRIMINATION ON FED ASSISTED PROJECTS – OUTREACH & NOTIFICATION 11

VIII. ATTACHMENTS (ON FOLOWING PAGES)..... 12

IX. EXHIBITS (ON FOLLOWING PAGES) 12

X. APPENDICES 12

ATTACHMENT A - TITLE VI COMPLAINT FORM 13

ATTACHMENT B – UNLAWFUL DISCRIMINATION POSTER..... 17

ATTACHMENT C – SIGNIFICANT LEP POPULATIONS IN CRAA SERVICE AREA* 18

EXHIBIT A – CIVIL RIGHTS GRANT ASSURANCE 19

EXHIBIT B – USDOT STANDARD TITLE VI/NON-DISCRIMINATION ASSURANCES 20

APPENDIX A – TITLE VI CONTRACTOR REQUIREMENTS 23

APPENDIX B – CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY 24

APPENDIX C – CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM 25

APPENDIX D – CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM 26

APPENDIX E – PERTINENT NON-DISCRIMINATION AUTHORITIES 27

COLUMBUS REGIONAL AIRPORT AUTHORITY TITLE VI PROGRAM

I. POLICY STATEMENT

The Columbus Regional Airport Authority (CRAA or Airport) is committed to ensuring that no person is excluded from participation in, is denied the benefits of, or is otherwise subjected to discrimination on the grounds of race, color, national origin, age, disability, sex, or creed under any program or activity receiving federal financial assistance at CRAA airports – John Glenn Columbus International Airport, Rickenbacker International Airport, and Bolton Field Airport as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL100.259), and Section 520 of the Airport and Airway Improvement Act of 1982. CRAA further assures that every effort shall be made to ensure nondiscrimination in all its programs and activities, regardless of whether those programs are federally funded or not.

CRAA requires Title VI assurances from each tenant, contractor, and concessionaire providing an activity, service, or facility at airports under lease, contract, or franchise from CRAA. CRAA also requires that such tenants, contractors, and concessionaires require Title VI assurances of their respective subcontractors/sub-concessionaires.

It is also CRAA policy to comply with Executive Order 12898 (1994), Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and Executive Order 13166 (2000), Improving Access to Services for Persons with Limited English Proficiency (LEP).

CRAA is committed to ensuring that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Additionally, CRAA will take reasonable steps to provide meaningful access to services for persons with limited-English proficiency.

Suzanne Bell, Sr. Attorney is designated as the Title VI Program Coordinator and is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 49 C.F.R. § 21.

Contact Information:

Suzanne Bell, Sr. Attorney, Columbus Regional Airport Authority
4600 International Gateway, Columbus, OH 43219
Legal@ColumbusAirports.com
614-239-5032

Joseph R. Nardone
President & CEO

II. STANDARD ASSURANCES

A. *49 C.F.R. § 21.7 Assurances*

Pursuant to 49 C.F.R. § 21.7, every application for federal financial assistance or continuing federal financial assistance must provide a statement of assurance and give reasonable guarantee that the program is (or, in the case of a new program, will be) conducted in compliance with all requirements imposed by or pursuant to Part 21 (Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964). The required standard FAA assurances are attached to this plan under the Exhibit section as **Exhibit B**.

B. *Contractual Assurance*

CRAA strives to include in all its contracts, leases, deeds, or other similar documents the civil rights provisions required by the FAA. As previously stated, CRAA also requires these provisions in all subcontracts, subleases, and other agreements at any tier when included in the prime contract.

C. *Public Notice*

CRAA conspicuously displays signs throughout its airports notifying the public that discrimination based on race, color, national origin, sex, and creed is prohibited. The Title VI Notice is included in this plan as **Attachment B**. A physical copy of 49 C.F.R. Part 21 is available for inspection at CRAA's Administrative Offices, 4600 International Gateway, Columbus, OH 43219 during normal business hours.

III. ORGANIZATIONAL STAFFING AND RESPONSIBILITIES

A. *Executive Authorization*

CRAA's President & CEO is committed to ensuring compliance with nondiscrimination provisions under this Title VI program, including the requirements under 49 C.F.R. § 21.

B. *Assigned Title VI Coordinator*

Title VI program management shall be performed by an assigned Title VI Coordinator. The Title VI Coordinator is committed to ensuring implementation and compliance with the Title VI Program. This includes monitoring Title VI compliance by contractors, subcontractors, consultants and suppliers under federally funded projects or programs.

C. *Title VI Environmental Justice*

To ensure compliance with the environmental justice aspects of the Title VI program, the Title VI Coordinator will work with CRAA's Planning & Engineering Department and/or other designated CRAA employees to oversee and administer this program area.

D. *Title VI Coordinator's Duties and Responsibilities*

The Title VI Coordinator is responsible for initiating, monitoring, and committed to ensuring compliance with Title VI program requirements as follows:

- 1. Program Administration.** Administers the Title VI Program and coordinates implementation of the program. Committed to ensuring compliance with the assurances, policy, and program objectives. Annually reviews CRAA Title VI program and disseminates Title VI information, education, etc., to CRAA leadership and others as required.
- 2. Complaints.** Receives, records, and reviews written Title VI complaints received by CRAA. Forwards a copy of the complaint to the Federal Aviation Administration (FAA) within 15 days of receipt and provides the FAA with an explanation of resolution attempts regarding the complaint. 49 CFR Part 21 Appendix C(b)(3) requires that every effort is made to resolve complaints informally at the local or regional level.

3. **Data Collection.** Reviews the statistical data gathering process periodically to ensure sufficiency of data for meeting the requirements of Title VI program administration. Statistical data on race, color, national origin, age, disability, sex, creed, income level and language spoken of participants in, and beneficiaries of, programs is to be gathered and maintained by program area.
4. **Training.** Works in tandem with CRAA Human Resources Department to facilitate training on Title VI issues and regulations as needed for employees and encourages Title VI training for other staff, contractors, and tenants.
5. **Title VI Plan Update.** Annually reviews and updates, if necessary, CRAA's Title VI Program and disseminates Title VI Information, education, etc. to program liaisons as needed or required.
6. **FAA Requests.** Responds to requests by the FAA for data and records to determine Title VI compliance. Coordinates with program liaisons to ensure that racially and ethnic data showing the extent to which minority groups are beneficiaries of or impacted by airport programs is available (49 CFR § 21.9(b) & (c).
7. **Monitors Lists:** Maintains a list of the race, color, national origin, age, disability, sex, creed, LEP, income level and language spoken representation on non-elected planning and advisory bodies for CRAA. Identifies any disparity between representation on these entities and the airport beneficiaries to the selecting official/committee when vacancies occur. DOT Order 1000.12(4)(b)(2)(a) also mandates that airport recipients maintain a copy of 49 CFR Part 21 for inspection by any person requesting it during normal business hours. This regulation is available at <http://ecfr.io/Title-49/Part-21>, 49 CFR Appendix C (b)(2)(i).
8. **Public Dissemination.** Works with CRAA staff to develop and disseminate Title VI program information to airport employees and subrecipients, including contractors, subcontractors, consultants, and subconsultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements, and/or inclusion of Title VI language in contracts/agreements, and website postings. Ensures copies of Title VI program and a paper copy of 49 CFR Part 21 are available for public inspection during normal business hours.
9. **Limited English Proficiency (LEP).** Administers and monitors CRAA's LEP commitments. CRAA shall follow Executive Order 13166 in identifying and engaging LEP populations. A LEP person is defined as one who does not speak English as his or her primary language and has a limited ability to read, write or understand English. CRAA's policy in addressing individuals with LEP is to provide translation services upon request if such services can be reasonably obtained.

IV. DISCRIMINATION COMPLAINT GUIDELINES AND PROCEDURES

CRAA adopts the following discrimination complaint procedures for complaints alleging discrimination in airport services, programs, or activities, which are to be followed in filing a complaint. These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination.

- A. *Filing a discrimination complaint:* Any person who believes that he or she has been or is being subjected to discrimination on the basis of race, color, national origin, sex, or creed by the Airport, airport employees, tenants, vendors, or agents has the right to file a complaint. Any individual wishing to file a discrimination complaint must be given the option to file the complaint with CRAA, or directly with the Federal Aviation Administration's Office of Civil Rights. Complaints may be filed with both agencies simultaneously. Information on how to file a Title VI complaint is posted on CRAA's website and on public notices distributed across the airport properties. A Title VI complaint form may be obtained online, by contacting the Title VI Coordinator, Suzanne Bell, Sr. Attorney at Legal@ColumbusAirports.com or 614-239-5032. See **Attachment A, CRAA Title VI Complaint Form**, for an informational copy of the

complaint form. If a complainant is unable to complete the complaint form in writing due to disability or limited-English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet or lack the ability to pick up a form, a complaint form can be mailed upon request.

- B. *Complaint filing timeframe:* A discrimination complaint must be filed by mail, online, in person or by telephone within one hundred eighty (180) calendar days of either:
1. The alleged act of discrimination.
 2. Date when the person(s) became aware of the alleged discrimination.
 3. Date on which the conduct was discontinued if there has been a continuing course of conduct.

CRAA or its designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing. The filing date is the date the person completes, signs, and submits the complaint form.

- C. *Contents of a complaint:* A discrimination complaint must be written. The document must contain the following information:
1. The complainant's name and address, or other means by which the complainant may be contacted.
 2. Identification of individual(s) or organization(s) responsible for the alleged discrimination.
 3. A description of the complainant's allegations, which must include enough detail to determine whether CRAA has jurisdiction over the complaint and if the complaint was filed timely.
 4. The specific prohibited base(s) of alleged discrimination (i.e., race, color, national origin, age, disability, sex, or creed).
 5. Apparent merit of the complaint.
 6. The complainant's signature or signature of his/her authorized representative.

In the event that a person makes a verbal complaint of discrimination to a CRAA officer or employee, the complainant shall be interviewed by the Title VI Coordinator and/or a representative from CRAA's legal department. If necessary, the Title VI Coordinator will assist the complainant in transcribing the complaint to writing and then submit the written version of the complaint to the person for signature.

- D. *Complaints:* Any complaints received against CRAA, our employees, tenants and concessionaires, will be forwarded to the Federal Aviation Administration for investigation. CRAA shall assign an impartial investigator to investigate any complaint in which it has been named in the complaint or in instances where the Title VI Coordinator cannot investigate. Depending upon the nature of the complaint and the parties involved the impartial investigator may be from CRAA's legal team or a third-party. The contact information for the FAA is:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591
Phone: (202) 267-3258

- E. *Notice of receipt:* All complaints shall be referred to CRAA's Title VI Coordinator for review and action. Within fifteen (15) days of receipt of the discrimination complaint, the Title VI Coordinator shall issue an initial written Notice of Receipt that:
1. Acknowledges receipt of the discrimination complaint.

2. Advises the complainant of the right to seek representation by an attorney or other individual of choice in the discrimination complaint process.
 3. Contains a list of each issue raised in the discrimination complaint.
 4. Advises the complainant of the timeframes for processing the discrimination complaint and providing a determination.
 5. Advises the complainant of the right to also seek redress of the complaint directly with the FAA Office of Civil Rights.
- F. *Notification to the FAA of a complaint:* CRAA shall advise the FAA within fifteen (15) calendar days of receipt of the complaint. The notice will contain a copy of the original Title VI complaint filed with CRAA.
- G. *Processing a complaint and timeframe:* The Title VI Coordinator will receive, manage, and make a determination on all filed complaints. Investigations will generally be completed within forty-five (45) days from receipt of a completed complaint form. If more information is needed to resolve a complaint, the Title VI Coordinator may contact the complainant and request more information. If the requested information is not received within fifteen (15) calendar days from the date of the request, the Title VI Coordinator may administratively close the complaint. A complaint may also be administratively closed if the complainant no longer wishes to pursue the case.
- H. *Notice of Final Action:* After the Title VI Coordinator reviews the complaint and completes the investigation, he or she will provide a Notice of Final Action to the complainant. The Notice will include:
1. A statement regarding the disposition of each issue identified in the discrimination complaint and reason for the determination; and
 2. An explanation of any corrective action taken.
 3. If the Title VI Coordinator's final response does not satisfactorily resolve the matter, the complainant and/or authorized representative may appeal to CRAA's President & CEO, 4600 International Gateway, Columbus, Ohio 43219. The complainant should file a written appeal, including a detailed description of its basis, within thirty (30) calendar days after the date of the Title VI Coordinator's final response. Within thirty (30) calendar days after receiving an appeal, CRAA's CEO or designee ("the Appeals Officer"), shall attempt to contact the complainant to discuss the matter and possible resolution. Within forty-five (45) calendar days after the filing of the appeal, the Appeals Officer will provide a final written resolution of the complaint.

CRAA's Title VI Coordinator shall provide the FAA Office of Civil Rights with a copy of the final decision, as well as a summary of findings upon completion of the investigation. Should deficiencies be noted in the implementation of these discrimination complaint procedures by CRAA, the FAA's Title VI Program Coordinator will work in conjunction with CRAA's Title VI Coordinator to review the information and/or provide technical assistance in the discrimination complaint process and/or investigation.

- I. *Recordkeeping:* The Title VI Coordinator shall maintain a log of complaints filed that allege discrimination. The log must include:
1. The name and address of the complainant.
 2. Basis of discrimination complaint.
 3. Description of complaint.
 4. Date filed.
 5. Disposition and date.
 6. Appeals and resolutions.
 7. All correspondence, as well as any other pertinent information.

All records regarding discrimination complaints and actions taken on discrimination complaints shall be maintained for a period of not less than five (5) years from the final date of resolution of the complaint.

CRAA's Title VI Policy Statement, Program, and Complaint Procedure are available upon request from CRAA's Title VI Coordinator via email Legal@ColumbusAirports.com or in hard copy at CRAA's Administration Offices located at 4600 International Gateway, Columbus, Ohio 43219. Upon request, it may also be made available in alternate formats by contacting the Title VI Coordinator as directed above.

V. LANGUAGE ASSISTANCE PROGRAM AND PLAN

This **Language Assistance Plan** (LAP) has been prepared to address CRAA's responsibilities as a recipient of federal financial assistance as it relates to the needs of individuals with Limited English Proficiency (LEP) language skills. CRAA utilizes the Language Line services for real time translation at all three airports. This service is also available to our airline and concessionaire partners.

Executive Order 13166 issued on August 11, 2000, *Improving Access to Services for Persons with Limited English Proficiency*, indicated that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. The Executive Order directs agencies to publish guidance for their respective recipients clarifying their obligation to ensure that such discrimination does not take place. The Executive Order also requires federal agencies, and their recipients, to examine the services provided, identify any need for services to those with LEP and develop and implement a system to provide those services so limited English proficient individuals have meaningful access to those services.

CRAA has developed this LAP to help identify reasonable steps for providing language assistance to persons with LEP who wish to access provided services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. The starting point is an assessment that balances the following four factors:

1. The number or proportion of LEP individuals in the service area who may encounter or be served by the Airport.
2. The frequency with which LEP individuals encounter Airport services.
3. The nature and importance of services provided by the Airport to the LEP population.
4. The resources available to the Airport and overall cost to provide LEP assistance.

Determining Need: Four Factor Analysis

Factor 1: The number or proportion of LEP individuals in the service area who may encounter or be served by the Airport.

The *U.S. Census Bureau's 2015-2019 American Community Survey (ACS) 5 Year Estimate* was the major data source used to determine the number of LEP persons in the Airport's service area. Since all CRAA airports are in Franklin County, with Rickenbacker International Airport sharing a minor section in Pickaway County, CRAA's service area has been determined to be Franklin County.

Attachment C presents the data information utilized to determine the service area's applicable language(s) other than English. Based on the overall gross number and associated percentage, the only ethnic group that presents a statistically significant implication is the Hispanic group. All other groups statistically register as too small mathematically to prompt formal and technical efforts on behalf of the airport.

Factor 2: The frequency with which LEP individuals encounter Airport services.

Two different sources were considered to determine the frequency with which LEP individuals utilize airport services. The first consideration was to determine the frequency (inbound/outbound) with which LEP individuals can utilize CRAA airports for international flights. Thus, a review was conducted to identify the number of international flights that are scheduled at CRAA airports. Since CRAA airports are all domestically focused, with only John Glenn Columbus International Airport offering international air service through seasonal or charter

flights to Mexico, international flight data does not warrant recommending potential language services. Our review identified international “connection” flights to Europe, Central America, Asia, and the Caribbean; however, these international connections do not originate at CRAA airports.

Second, a review of requested translation services for the immediate past calendar year at CRAA airports was performed to identify the type of language services requested, the number (or frequency) of translation services requested, and where or how these service requests came to CRAA. There were (16) sixteen requests received in 2020 all or most requested assistance with Spanish language services and (28) twenty-eight requests in 2021. Again, all or most of the language assistance in 2021 dealt with interpretation or Spanish language translation assistance. This data was acquired from Language Line Services, Inc. based in Monterey, California.

Factor 3: The nature and importance of services provided by the Airport to the LEP population.

CRAA airports, particularly John Glenn Columbus International Airport, serve as gateway airports connecting Ohio to the world. However, given the statistically minor LEP populations in CRAA’s airport service area, the small number of scheduled international flights, the low requests for foreign language services, CRAA offers limited non-English language services. CRAA remains ready to serve its customers who may have LEP and is committed to ensuring all individuals, regardless of their origin or their language, a safe and pleasurable transportation experience as part of CRAA’s critical airport mission. CRAA also extends and applies its LAP program to its tenants.

Factor 4: The resources available to the Airport and overall cost to provide LEP assistance.

Assessing the cost and availability of resources to provide LEP assistance is a continual process. It can involve utilizing translation services for appropriate documents, including but not limited to the Civil Rights Notice, the complaint form, and complaint procedures for example, utilizing language interpreters, where appropriate and analyzing the need for surveys to identify the predominant non-English languages spoken at CRAA airports. CRAA is committed to providing the financial resources needed to assist its LEP passengers.

Implementation

An important element in providing meaningful access for LEP individuals is to ensure effective communication and plan implementation. To accomplish this objective, the following language assistance measures and actions will be implemented:

1. On an annual basis the Title VI Coordinator will review and attempt to identify the applicable LEP populations.
2. Identify and recommend language assistance measures.
3. Where applicable, provide and coordinate staff training.
4. Provide notice to applicable LEP populations.
5. Monitor and update the LAP Plan.

Item 1 – Identification of LEP Individuals: As previously stated, CRAA utilized the *U.S. Census Bureau’s 2015-2019 American Community Survey (ACS) 5 Year Estimate* as its major data source to determine the number of LEP populations in CRAA’s airport service area. As previously stated, based on the overall gross number and associated percentage, the only ethnic group that presents a statistically significant implication is the Hispanic group. All other groups statistically register as too small mathematically to prompt formal and technical efforts on behalf of the airport.

A review of the number of requests for translation services revealed that there were (16) sixteen requests received in 2020 and (28) twenty-eight requests in 2021 based on billed assistance from Language Line Services, Inc. based in Monterey, California. CRAA will continue to offer translation services upon request and when addressing LEP populations that statistically meet a significant percentage threshold for airport consideration and action.

Item 2 – Language Assistance Measures: CRAA shall take reasonable steps to provide the opportunity for meaningful access to LEP populations who have difficulty communicating in English, including:

1. When a request is received by a CRAA representative/agent, (Note: CRAA's Customer Service department or a CRAA police officer generally receives the request first) passengers are directed to contact Language Line for immediate assistance. In the event assistance is unable to be rendered, a request will be sent to the CRAA's Title VI Coordinator. The Title VI Coordinator will respond, clarify, or accordingly seek supplemental support depending upon the individual's need.
2. Similarly, when written communication is received from an LEP person, the written communication shall also be referred to the Title VI Coordinator for interpretation and response on behalf of CRAA.
3. When CRAA identifies a need for LEP services, such as when presentations will be made or planned by CRAA staff in local areas with a known concentration of LEP persons, special efforts shall be considered to have meeting notices, fliers, advertisements and agendas printed in the applicable language, as well as consider providing interpreter services for meeting interaction, when applicable.
4. Attempt to utilize CRAA airport volunteers who speak several different languages as translators to help travelers navigate CRAA airports when such a need is identified.

Item 3 – Staff Training: CRAA shall take proactive steps to ensure that all its employees, contractors, tenants, and concessionaires are familiar with its LAP program policies and procedures and how to assist with communication to LEP passengers.

1. On an as-needed basis, all CRAA airport staff, contractors, tenants, concessionaires, and stakeholders shall be informed and knowledgeable of CRAA's Title VI Policy and Program, the LAP, and the assistance available to assist LEP passengers through a letter/email from CRAA's Title VI Coordinator, and on an annual basis at airline station managers' meetings.
2. All CRAA public contact positions receive training as part of the new hire orientation highlighting the CRAA's LAP and any new services for LEP passengers are explained and/or demonstrated.
3. CRAA staff is continually encouraged to attend workshops and training designed to highlight cultural diversity and meet language assistance needs (where applicable)

Item 4 – Notice to LEP Individuals: CRAA shall utilize, when applicable, a variety of resources to notify its passengers of the available LEP services, including:

1. Special efforts shall be considered by CRAA in having all outreach documents state that translation and/or interpretation services are available, as well as consideration to working with LEP groups and organizations, when deemed applicable, to inform and outreach to the LEP applicable community.
2. Since the greater LEP population in CRAA's service area is Hispanic, CRAA will consider having critical airport signage posted in English and Spanish as part of its LEP assistance efforts in terminal facilities.
3. CRAA will attempt to identify and maintain a roster of airport personnel that speak foreign languages as an assistance measure to individuals requiring foreign language assistance.

Item 5 – Monitor and Updating the LAP Plan: CRAA will annually self-evaluate its LAP plan and its components by addressing questions such as those listed below and will formally update its Title VI Program every (3) three years.

1. How many LEP persons utilized interpretation and translation services, and what languages were most commonly requested or used?
2. What do the demographics and languages spoken by the travelers using the Airport tell us?
3. Has there been a need realized for additional information to be provided in CRAA's service area or an LEP population language?

Dissemination

CRAA's Title VI Program to include the Language Assistance Program (LAP) will be posted on its website. A copy of the Title VI Program and the LAP is also available through CRAA's Title VI Coordinator upon request.

VI. ENVIRONMENTAL JUSTICE

CRAA shall comply with federal requirements under the environmental justice clauses:

- Executive Order 12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations")
- DOT Order 5610.2A ("Department of Transportation Updated Environmental Justice Order")
- FAA Order 1050.1F ("Environmental Impacts: Policies and Procedures") and FAA Order 5050.4B ("National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions")

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, ethnicity, income, national origin, or educational level with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

CRAA's environmental justice objective is to identify and address disproportionately high and adverse human health and environmental effects, including interrelated social and economic effects on minority populations and low-income populations. To achieve this objective CRAA will give consideration of its impacts to minority and low-income populations. CRAA proposes measures to avoid, minimize, or mitigate disproportionately high and adverse effects. CRAA considers alternatives or proposed programs where alternatives would result in avoiding or minimizing disproportionately high adverse human health or environmental impacts.

CRAA shall seek public participation in its projects and airport development to ensure the fair treatment and involvement of all CRAA airport constituents, particularly the minority and low-income communities. Towards this end, CRAA shall provide:

- Meaningful involvement.
- Early involvement, which is critical—**before** key decisions are made or alternatives are eliminated.
- Early identification and consideration of key issues and community concerns, including but not limited to, displacement (e.g., of people and businesses), noise and air quality environmental issues, and avoiding impacts.

VII. NONDISCRIMINATION ON FEDERALLY ASSISTED PROJECTS – OUTREACH AND NOTIFICATION

As called for under 49 CFR Part 21, Appendix C (a) (1) (ix), CRAA shall, as part of its notification and outreach efforts, ensure coordination of its Title VI Plan with the local transit authority and the Federal Transit Administration to assure that public transportation is available and convenient to the disadvantaged areas of nearby communities to enhance employment opportunities for the disadvantaged and minority population. CRAA employment opportunities, to include tenants and concessionaires shall be available to all regardless of race, color, national origin, sex, or creed.

As also called for under 49 CFR Part 21, Appendix C (a) (1) (x), CRAA shall ensure that the minority business community in CRAA's service area are advised of CRAA's concession opportunities, and that proposals are solicited from such qualified minority firms, and that awards are made without regard to race, color, national origin, sex, or creed.

Utilizing the appropriate procurement methodology (i.e. request for proposals, request for qualifications, etc.) for CRAA concessions are solicited from area minority businesses through the following avenues: Ohio

Department of Transportation (ODOT) certified ACDBE directories, local minority, and general newspapers, B2G Now and collaborative groups, including partner agencies, etc.

Information on the concession award process and documentation on specific concession decisions is kept within the CRAA's Procurement and Business Diversity Department.

To fully engage and keep the community informed, CRAA will establish a Title VI Program link on CRAA's websites ColumbusAirports.com, RickenbackerAirport.com and FlyColumbus.com detailing information, providing updates, applicable statistical data, and methods of reporting issues.

VIII. ATTACHMENTS (ON FOLOWING PAGES)

- A – CRAA TITLE VI Complaint Form
- B – Unlawful Discrimination Poster
- C – Significant LEP Populations in CRAA Service Area

IX. EXHIBITS (ON FOLLOWING PAGES)

- A – Civil Rights Grant Assurance
- B - USDOT Standard Title VI/Non-Discrimination Assurances

X. APPENDICES (ON FOLLOWING PAGES)

- A - Title VI Contractor Requirements
- B – Clauses for Deeds Transferring United States Property
- C – Clauses for the Transfer of Real Property Acquired or Improved Under Activity, Facility, or Program
- D – Clauses for Construction/Use/Access to Real Property Acquired Under the Activity, Facility, or Program
- E – Pertinent Non-Discrimination Authorities



ATTACHMENT A - TITLE VI COMPLAINT FORM

The Columbus Regional Airport Authority (CRAA) is committed to meeting its Title VI obligations at its airports, by its employees, tenants, and concessionaires. If you feel that you have been discriminated against at one of our airports, please document your complaint by completing this form and submitting it to:

Susan Bell, Title VI Program Coordinator
 Columbus Regional Airport Authority
 4600 International Gateway
 Columbus, Ohio 43219
Legal@ColumbusAirports.com
 614-239-5032

Complaint forms can be submitted via a) **online fillable pdf**; b) **email**; c) **mail**; d) **in person at CRAA’s Administrative Offices**, 4600 International Gateway, Columbus, OH 43219 during normal business hours.

Please be advised that CRAA is obligated to comply with the Ohio Public Records Law, Ohio Revised Code Sections 149.43 et. Seq. Furnishing the requested information is voluntary; however, the failure to provide such information may result in CRAA being unable to process your complaint.

Section I: Complainant Information	
1. Complainant Name:	
2. Address (City, State & Zip Code):	
3. Telephone (include area code): () -	3a. Secondary Phone (Optional): () -
4. Email Address:	
5. Accessible Format Requirements:	<input type="checkbox"/> Large Print <input type="checkbox"/> Audio <input type="checkbox"/> TDD <input type="checkbox"/> Other

Section II: Person (other than Complainant) Alleging Discrimination	
6. Are you filling out this complaint on your own behalf?	<input type="checkbox"/> YES* <input type="checkbox"/> NO
*If you answered "yes" to #6, go to Section III.	
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:	
8. What is your relationship with this individual?	
9. Please explain why you have filed for third party:	
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf. <input type="checkbox"/> YES <input type="checkbox"/> NO	
Section III: Discrimination Basis / Timeframe / Allegation	
11. I believe the discrimination I experienced was based on (<i>check all that apply</i>): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Sex <input type="checkbox"/> Creed	
12. Date of alleged discrimination: (mm/dd/yyyy)	
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses.	

Section IV: Previous Complaint	
14. Have you previously filed a Title VI complaint with any Federal Agencies? [] YES [] NO	
Section V: Previous Agency Complaint	
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [] YES* [] NO	
*If yes, check all that apply:	
[] Federal Agency [] State Agency [] Local Agency [] Federal Court [] State Court	
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone: (include area code) () -	Email:
Section VI: Previous Agency Information	
Name of Agency complaint is against:	
Contact Person:	
Telephone (include area code) () -	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date are required below to complete form:

Signature: _____

Name: _____

Date: _____

For Airport Use Only

Name of Title VI Coordinator or Employee Processing the Complaint:

Date and Method Complaint Was Submitted: (mm/dd/yyyy)

In Person Fillable pdf w/e-sign Mail/Received Email/Online

Start Date of Complaint Review:

(mm/dd/yyyy)

Date FAA Notified:

(mm/dd/yyyy)

Days Since Incident:

Date Complaint Receipt Notification Sent to Complainant:

(mm/dd/yyyy)

Resolved within 15 Days:

Yes No Pending

List Special Accommodations:

Braille Services Sign Language TDD's

Translation Services

Resolution Notes

Appeal Filed Date (mm/dd/yyyy)

Yes No

Signature: _____

Date: _____

ATTACHMENT B – 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: Suzane Bell, Sr. Attorney
Phone: 614-239-5032
Address: Columbus Regional Airport Authority
4600 International Gateway/ Columbus, Ohio 43219

Discriminacion Ilegal

Se prohíbe 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: Suzanne Bell, Sr. Attorney
Teléfono: 614-239-5032
Dirección: Columbus Regional Airport Authority
4600 International Gateway/ Columbus, Ohio 43219



U.S. Department of Transportation
Federal Aviation Administration

HQ-101066

**ATTACHMENT C – SIGNIFICANT LEP POPULATIONS IN CRAA
SERVICE AREA***

Total Population	11,655,397	100%
Breakdown of LEP population by:		
AREA	NUMBER	PERCENT
Hispanic	443,415	3.8
Asian Indian	89,485	0.8
Chinese	56,642	0.5
Filipino	19,845	0.2
Japanese	9,599	0.1

**Consisting of Franklin County*

Source of Data: 2015-2019 American Community Survey 5-Year Data Profile, U.S. Census

EXHIBIT A – CIVIL RIGHTS GRANT ASSURANCE

This civil rights grant assurance is incorporated in all grant agreements between a sponsor and the FAA.

The sponsor will comply with such rules as are promulgated to assure that no person shall, on the grounds of race, color, national origin, age, disability, sex, or creed, be excluded from participating in any activity conducted with or benefiting from funds received from this grant. This assurance obligates the sponsor for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the sponsor or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits or (b) the period during which the sponsor retains ownership or possession of the property.

EXHIBIT B – USDOT STANDARD TITLE VI/NON-DISCRIMINATION ASSURANCES

The United States Department of Transportation (USDOT)

Standard Title VI/Non-Discrimination Assurances

DOT Order No. 1050.2A

CRAA (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Aviation Administration (FAA), it is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation—Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the FAA.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted *Airport Improvement Program (AIP)*:

1. The Recipient agrees that each "activity", "facility", or "program", as defined in §§ 21.23 (b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated or will be (with regard to a "facility") operated or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, or material subject to the Acts and the Regulations made in connection with all *AIP* and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"CRAA, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, CRAA also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the FAA access to records, accounts, documents, information, facilities, and staff. CRAA also recognizes that it must comply with any program or compliance reviews, and/or complaint investigations conducted by the FAA. CRAA must keep records, reports, and submit the material for review upon request to FAA, or its designee in a timely, complete, and accurate way. Additionally, CRAA must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

CRAA gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the AIP. This ASSURANCE is binding on CRAA, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the AIP. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

By: _____
(Signature of Authorized Official)

Dated: _____

APPENDIX A – TITLE VI CONTRACTOR REQUIREMENTS

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in federally assisted programs of the U.S. Department of Transportation, FAA, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FAA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FAA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FAA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through five in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FAA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter the litigation to protect the interests of the United States.

APPENDIX B – CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that CRAA will accept title to the lands and maintain the project constructed thereon in accordance with the Regulations for the Administration of AIP and the policies and procedures prescribed by the FAA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto CRAA all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto CRAA and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the CRAA, its successors and assigns.

CRAA, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed and (2) that CRAA will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

**APPENDIX C – CLAUSES FOR TRANSFER OF REAL PROPERTY
ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR
PROGRAM**

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered by CRAA pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, CRAA will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, CRAA will have the right to enter or re-enter the lands and facilities thereon, and the above-described lands and facilities will there upon revert to and vest in and become the absolute property of CRAA and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

**APPENDIX D – CLAUSES FOR CONSTRUCTION/USE/ACCESS
TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY,
FACILITY OR PROGRAM**

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered by CRAA pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, CRAA will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, CRAA will there upon revert to and vest in and become the absolute property of CRAA and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E – PERTINENT NON-DISCRIMINATION AUTHORITIES

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, color, national origin, sex or creed);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage, and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 — 12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).