



# Title VI Plan

Federal Aviation Administration

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Mobile Airport Authority  
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# Mobile Airport Authority

## Title VI Plan

### Mobile Airport Authority

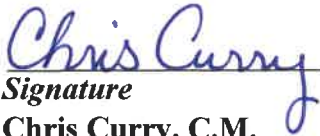
#### 1. Title VI Policy Statement<sup>1</sup>

**Mobile Airport Authority** 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.

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

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

**Rita Barren**, available at (251) 438-7334 and [rbarren@mobairport.com](mailto:rbarren@mobairport.com), is responsible for overseeing the Mobile Airport Authority Board of Directors’ compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

  
*Signature*  
**Chris Curry, C.M.**  
**President**

March 27, 2024  
**Effective Date**

March 26, 2027  
**3-Year Expiration Date**

<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

**Mobile Airport Authority Board of Directors** will review and adopt this Title VI Plan for **Mobile Airport Authority**. 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 President, **Chris Curry’s name** or Title VI Coordinator, **Rita L. Barren’s name**. Significant revisions to our policies or federal guidelines may warrant re-adoption by the **Mobile Airport Authority Board of Directors** and resubmittal to FAA.

In addition to the Coordinator and Mobile Airport Authority Board of Directors’ leadership, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	Title
Stephanie Phillips	Property and Concession Coordinator

**Mobile Airport Authority** has no sub-recipients.

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

Federal Source	Grant Number	Amount
None		

“In addition, **Mobile Airport Authority** sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT): **None**

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

Federal Source	Grant Award Information Available at:
Grant Awards	<a href="https://www.mobileairportauthority.com/press-releases/">https://www.mobileairportauthority.com/press-releases/</a>

## 3. Grant and Procurement Assurances

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

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

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 [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. **Mobile Airport Authority** requires Civil Rights clauses (collectively, “Required Clauses”) to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

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

*The Title VI Coordinator will develop a contract clause requirement template that is required for all federally assisted construction contracts. The Title VI Coordinator and Procurement Dept will review construction and concessionaire contracts before and after execution to ensure all contractors and concessionaires, acknowledge and accept the federal contract assurances, and in conjunction with the Design and Construction Management team and legal counsel, will review sample of subcontracts for federally assisted projects.*

*Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Procurement Dept. to verify they include the template Language. The Mobile Airport Authority Procurement Department will randomly select three or more contracts per year, and review the subcontracts awarded in the last year that are under the scopes of those primary contracts to ascertain compliance with all of the above-stated requirements and clauses.*

## **4. Title VI Coordinator Responsibilities**

The Coordinator is responsible for ensuring that they and other staff supporting 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 the Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Mobile Airport Authority Board of Directors is in compliance with nondiscrimination requirements of Title VI and reports to **Mobile Airport Authority** 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 Mobile Airport Authority Board of Directors' 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 (<https://faa.civilrightsconnect.com/>).

## 5. Notice

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

**Mobile Airport Authority** 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 [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/) and a completed copy is attached. See Section 15 Appendix.

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

**Mobile Airport Authority** has posted the above Title VI policy statement at its staff offices.

**Mobile Airport Authority** “will distribute” this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan “will be” distributed by **July 31, 2024**, by “email, tenants meetings, and hardcopy where applicable.” It will also be posted on our airport website at <https://www.mobileairportauthority.com/>.

Posters will be displayed in each terminal and other areas on airport property, including the following public locations: Posters will be displayed as additional facilities come into use.

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Administrative Offices at MOB Terminal	2		
MOB Concourse		4	
Security Badge Office	1		
Airport Police Facility	1		
Airport Fire Station Facility		1	
TSA Check-in Area	1	1	
Concessions Areas	1		
Rental Car	1	2	
Customer Service Desk	1		

Outreach to Affected Communities

The **Mobile Airport Authority Marketing Department** will ensure that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify effective media platforms to share announcements and notices. Announcements will be made in social media, advertising online and/or printed news, press release, general circulation newspapers, community newspapers, email broadcast to partners to share or directly to interested parties, and/or verbal announcements to community and every outreach event.

The **Procurement Office** will contact 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 will maintain records of all such notices and the efforts made to reach each of the Affected Communities.

**Mobile Airport Authority** will create a detailed CPP by June 30, 2024. A copy of the plan will be available at <https://www.mobileairportauthority.com/>.

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<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.

To ensure that the community is effectively informed of and able to participate in public hearings, the airport will include public notices translated into appropriate languages when requested, 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 directions for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

## 6. Community Statistics

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

Mobile Regional Airport (Airport) (FAA identifier KMOB), which is approximately 11 miles due west of the City’s downtown area. The airport elevation is 218.7 feet MSL. MOB is a public-owned facility, and it is presently the City’s primary commercial service airport encompassing 3,073 acres. Development adjacent to the Airport is aeronautical and non-aeronautical industrial and commercial uses. In addition, the flight path including an aircraft’s trajectory and the path in the air following that exposes the underlying property to a sound level over DNL 65, does not include any residential communities. However, the Airport has identified two communities as potentially affected communities. The Baker community comprises of zip code, 36608, and Westlake community comprises of zip code 36695.

Affected Communities <sup>4</sup>	Population
Baker Community	34,691
Westlake Community	52,396

(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

<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>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.



Justice in Minority Populations and Low-Income Populations,” **Mobile Airport Authority** is collecting information about affected and potentially affected low-income communities. According to *U.S. Census Report, such as S1701: Poverty Status in the Past 12 Months*, the overall poverty level for the Baker and Westlake communities, which is located over two zip codes (36608 and 36695) is an average of approximately 14.4%, which is similar to the rest of Mobile County at 17.6% The poverty rates for the Affected Communities by zip code are as follows:

<b>Affected Communities Baker Community (36608)</b>	<b>Poverty Rate</b>
Baker Community	18.6%
Westlake Community	10.0%

The “Percent below poverty level” column from Table S1701, American Community Survey (ACS) 5-Year Estimate to populate the data for the Poverty Rate column in the above table.

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>:

**Affected Community: Baker Community (36608)**  
**Total Affected Community Population: 34,691**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	21,211	14.0%
Black or African American	11,336	25.4%
Asian	864	36.3%
Hispanic or Latino	1,385	29.0%
More than one	918	23.0%

**Potentially Affected Community: Westlake Community (36695)**

**Total Affected Community Population: 52,396**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	39,276	7.4%
Black or African American	10,846	18.4%
Asian	1,147	10.6%
Hispanic or Latino	1,352	20.9%
More than one	731	17.6%

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

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **Mobile Airport Authority** 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 American Community Survey, 5-year Estimates, the Airport utilized B16001 Table; Language Spoken At Home by Ability to Speak English, 2015.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>8</sup> The safe harbor for our community is **1,000**. 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 (36608)	Number	Margin of Error
Spanish	449	+/-222
Languages Spoken by LEP Population that Meet the Safe Harbor Threshold (36695)	Number	Margin of Error
Spanish	502	+/-260

The language listed above meets the Safe Harbor Threshold criteria. Below Mobile Airport Authority has identified other languages at Table B16001: Language Spoken at Home by Ability to Speak English. However, Mobile Airport Authority does not track the frequency of languages spoken by LEP persons at the Airport.

**Additional Languages Spoken - Baker Community (36608) \*No data available at this time.**

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				
French				
Portuguese				
German				
Greek				
Persian				
Vietnamese				
Arabic				
African Languages				

<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.

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

Mobile Airport Authority will update this information annually<sup>9</sup> through checking the following resources:

**Additional Languages Spoken – Westlake Community (36695) \*No data available at this time.**

<b>Languages Spoken by LEP Persons</b>	<b>A few times a year (12 or less days a year)</b>	<b>Several times a month (13 to 51 days a year)</b>	<b>At least once a week (52 to 364 days a year)</b>	<b>Every day (365 days a year)</b>
Spanish				
French				
German				
Persian				
Chinese				
Japanese				
Vietnamese				
Tagalog				
Arabic				

Mobile Airport Authority will update this information annually<sup>9</sup> through checking the following resources:

<b>Data Sources for Languages Spoken in Affected Community</b>	<b>Website link to Data Source</b>
U.S. Census Bureau	<a href="https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001">https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001</a>

<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.

Beneficiary Diversity.

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

**Description of Beneficiary Demographic Information Collection Methods**

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

Staff and Advisory Board Diversity.

Demographic information will be 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**

- *Mobile Airport Authority will ask employees 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 will ask board members by email asking them to enter demographic information voluntarily and anonymously through an online survey. The Airport will begin this practice on October 1, 2024, and each year moving forward.*

## 7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no **Airport** 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>9</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
Mobile Regional Airport	Baker Community
Mobile Regional Airport	Westlake Community

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
Mobile Regional Airport-Taxiway R Rehab	Baker Community
Mobile Regional Airport-Taxiway R Rehab	Westlake Community
Mobile Regional Airport – Taxiway C East Pavement & Lighting Rehab	Baker Community
Mobile Regional Airport- Taxiway C East Pavement & Lighting Rehab	Westlake Community

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		

<sup>9</sup> In order to carry out an alternative with a discriminatory impact, the Mobile Airport Authority Board of Directors 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.

## 8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the **Mobile Airport Authority** 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 - Baker Community (36608)

Spanish
French
Portuguese
German
Greek
Persian
Hindi
Urdu
Vietnamese
Tagalog
Arabic
African

### Language - Westlake Community (36695)

Spanish
French
German
Persian
Arabic
Chinese
Japanese
Vietnamese
Tagalog
Arabic

**Mobile Airport Authority** will collect data for languages spoken by airport guests.<sup>10</sup> Data sources include:

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<sup>10</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.

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
Airport language line usage data	www.language.com

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

<b>Language</b>
N/A

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the **Airport’s** 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:

<b>Translation Vendors</b>	<b>Languages</b>
<a href="https://translate.google.com/">https://translate.google.com/</a>	All above languages

- Information regarding translation services can be obtained at: Customer Service desk, (lower level, pre-security).

<b>Location for Translation Assistance</b>	<b>Languages</b>
Airport website request form	All above languages
Airport website translate view	Spanish
Volunteer multi-lingual staff pool	Spanish, Portuguese

**Interpretation Services:**

- The following vendor will be identified for interpretation services if needed:

<b>Interpretation Vendors</b>	<b>Languages</b>
Language Line, Inc.	All above languages

- Information regarding interpretation services will be obtained at the Customer Service desk (lower level, pre-security), MAA Police podium, and Concourse Main Area, 2<sup>nd</sup> Floor, post security). Also, the Airport will maintain a list of employees with their department locations that speak languages. This list will be available from the Customer Service desk.

<i>Location for Interpretation Assistance</i>	<i>Languages</i>
Airport information desks	All above languages
Airport information desks	All above languages, using Language Line, Inc. and Google Translate.

### **Description of Interpretation Assistance Processes (Pending)**

- *Mobile Airport Authority Customer Service Office will maintain a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient in providing interpretation and/or translation services. The list will be updated annually in the Public Information Handbook and provided to all airport employees.*
- *The airport will seek to contract with Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process will be used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contact Language Line, Inc. and “parks” the request in the queue for the appropriate language. Language Line, Inc. operators will coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is then logged in the Language Line Service binder. This log is kept for one year.*

## **9. Transportation**

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

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

We will coordinate with Wave Transit Authority, to encourage them to provide transit service access between the airport and these areas.

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



<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
Baker Community	Fixed-route buses	Planned
Baker Community	Fixed-route buses	Planned

## 10. Minority Businesses

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

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

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
All Airport Business Opportunities	Advertised through all local chambers of commerce, minority and woman owned business outreach email list
All Airport Business Opportunities	Small and Minority Business Resources outreach to registered small and minority businesses about upcoming and open airport business opportunities
All Airport Business Opportunities	Bids required to include disadvantaged business mentor component for sub-contractors

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 *the Procurement Office*.

## 11. Training

New employee orientation will incorporate 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

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

- Compliance reviews or audits concerning civil rights requirements<sup>11</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>12</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, Mobile Airport Authority must notify FAA contacts of any new investigations prior to grant execution.

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

## 13. Title VI Complaints

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

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

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters<sup>13</sup>
3. Allege misconduct by the Mobile Airport Authority, including airport employees, contractors, concessionaires, lessees, or tenants.

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<sup>11</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 Mobile Airport Authority Board of Directors or any of its sub-recipients by any State, local or Federal agency.

<sup>12</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 Mobile Airport Authority Board of Directors itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>13</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If a Mobile Airport Authority Board of Directors 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.

4. Concerning an airport facility or actions by the **Mobile Airport Authority** including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the **Mobile Airport Authority Board of Directors**.<sup>14</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.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the MAA President, Airport Ops V.P, Airport Director and the office named in the complaint.

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

Rita L. Barren, Title VI Coordinator  
1891 Ninth Street  
Mobile, AL 36615  
(251) 438-7334  
[rbarren@mobairport.com](mailto:rbarren@mobairport.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 for individuals unable to file a written complaint due to a disability.

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

### **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator no later than **12:00 pm** on the following business day, exclusive of weekends and holidays.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter,

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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 to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation, and resolution process.

## **Investigation Procedure**

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

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

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

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

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

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

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through first working with the parties involved to reach a dispute resolution. If necessary the following steps would be negotiation and/or mediation.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state Mobile Airport Authority'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*.

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

- The complainant may appeal in writing to the Mobile Airport Authority’s President, Mr. Chris Curry.
- 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 Authority’s President will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. Mobile Airport Authority 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 Rita L. Barren, Title VI Coordinator.

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

### **Website, In-person, and Other Distribution Methods**

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**1. Mobile Airport Authority website:** <https://www.mobileairportauthority.com/>

**2. Mobile Regional Airport DBE Program webpage:**  
<https://www.mobileairportauthority.com/mra/disadvantaged-business-enterprises/>

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**3. In-Person at MAA Administrative Office at:** 1891 Ninth St., Mobile, AL 36615

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**4. In-Person at Mobile Regional Airport Customer Service Desk or Administrative Office:**  
8400 Airport Blvd., Mobile, AL 36608

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**5. Via Email:** [rbarren@mobairport.com](mailto:rbarren@mobairport.com)

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**6. By Phone:** (251) 438-7334

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## 14. Population / Language Data

B16001 and S1701 Tables for the Mobile County Area from [www.census.gov](http://www.census.gov)

## 15. Completed Unlawful Discrimination Poster

[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/)