

# Sample Airport Sponsor Title VI Plan

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

The Gallatin Airport Authority (GAA) 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.

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

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

The Title VI Coordinator (Coordinator), Aaron Collins (406)898-3609 <a href="mailto:aaron.collins@bozemanairport.com">aaron.collins@bozemanairport.com</a> is responsible for overseeing the Airport Sponsor's compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

Brian Sprenger

**Chief Executive Office** 

GALLATIN AIRPORT AUTHORITY

01/01/2026 Effective Date

12/31/2027

**3-Year Expiration Date** 

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

# 2. Administration

GAA has reviewed and adopted this Title VI Plan for Bozeman Yellowstone International Airport. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the Senior Leadership or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the GAA and resubmittal to FAA.

In addition to the Coordinator and airport sponsor's leadership, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
None	

GAA has the following airport program sub-recipients:

#### **Sub-Recipients**

#### None

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

Federal Source	Grant Number	Amount
FAA	BIL 3-30-0010-071-2023	\$450,000
FAA	AIP 3-30-0010-070-2023	\$2,748,583
FAA	AIP 3-30-0010-068-2023	\$675,000
FAA	AIP 3-30-0010-065-2023	\$1,316,990
FAA	AIP 3-30-0010-064-2022	\$729,308

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

Federal Source	Grant Number	Amount
None		

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

#### Federal Source Grant Award Information Available at:

FAA	www.faa.gov/airports/aip
DHS	www.dhsgrantinfo.gov

#### 3. Grant and Procurement Assurances

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

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

#### Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See <a href="https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/">https://www.faa.gov/airports/aip/procurement/federal\_contract\_provisions/</a>. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. GAA requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. GAA uses FAA approved language in all RFP's/RFQ's and contracts/agreements that is regularly reviewed by the Coordinator.

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

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

# 4. Title VI Coordinator Responsibilities

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

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

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

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to GAA leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.

- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

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

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

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

GAA 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, and maintained. The poster template is available at <a href="https://www.faa.gov/about/office\_org/headquarters\_offices/acr/com\_civ\_support/non\_disc\_pr/">https://www.faa.gov/about/office\_org/headquarters\_offices/acr/com\_civ\_support/non\_disc\_pr/</a> and a completed copy is attached. See Section 15 Appendix.

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

GAA has distributed the above Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan was distributed by December 31, 2023 by email and tenant meetings.

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

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal	4	2	
Rental Car Concessions	4		1
Parking Concessions	1		1
Food and Beverage Concessions		2	
FBO's	3		

#### Outreach to Affected Communities

GAA ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in the Bozeman Chronicle and airport website. The airport office contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

Detailed information on our public notice and outreach procedures is available in the GAA Community Participation Plan (CPP). A copy of the CPP is available on the Airports website.

A copy of the plan will be available at https://bozemanairport.com/content/documents/Community-Participation-Plan 6.5.2025.pdf

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

# 6. Community Statistics

<sup>&</sup>lt;sup>3</sup> We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term "protected communities" is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

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

Affected Communities <sup>4</sup>		Population
D CCD	70.027	

Bozeman CCD	70,837
Belgrade CCD	30,273

Source: American Community Survey for Bozeman/ Belgrade CCD

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

We have identified the following facts about the Affected Communities:

#### Low Income Communities<sup>5</sup>.

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," GAA is collecting information about affected and potentially affected low-income communities. According to the U.S. Census Report S1701: Poverty status in the past 12 months the overall poverty level for the is approximately 11.4%. The poverty rate remains slightly higher compared with the rest of the Gallatin County. The poverty rates for the specific Affected Communities are as follows

Affected Communities	Poverty Rate
Bozeman CCD	12.5%
Belgrade CCD	9.3%
Gallatin County	6.9%

#### 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: *Bozeman CCD*Total Affected Community Population: 63,198

<sup>&</sup>lt;sup>4</sup> "Affected communities" means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

<sup>&</sup>lt;sup>5</sup> Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low income communities in airport programs and activities.

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

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White alone	57,539	90.8%
Black or African American	312	0.5%
American Indian or Alaska Native	527	0.8%
Asian	1,213	10%
Native Hawaiian or Other Pacific Islander	4	0%
Hispanic or Latino	2,720	4.3%

Source: American Community Survey for Bozeman CCD 2020

Affected Community: *Belgrade CCD*Total Affected Community Population: 30,273

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Demographic Group within Affected Community	Number of People in	Percent of Total		
	Minority Group	Affected Community		
		Population		
White	28,470	94%		
Black or African American	45	0.1%		
American Indian or Alaska Native	330	1.1%		
Asian	92	0.3%		
Native Hawaiian or Other Pacific Islander	0	0%		
Hispanic or Latino	868	2.9%		

Source: American Community Survey for Bozeman CCD 2020

#### Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that GAA 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 US Census Bureau B16001.

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 Galatin County which encompass both Bozeman CCD and Belgrade CCD and surrounding area. The Safe Harbor Threshold is 1,000. Please refer to the end of this document to find data for all languages in our community.

<sup>&</sup>lt;sup>7</sup> Recommend using language groups from the U.S. Census, and using data for the "Speak English less than 'very well'" category for each language over the threshold.

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

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
None		

# Currently no language spoken by LEP Persons meet Safe Harbor threshold for Bozeman CCD or Belgrade CCD.

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

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
Spanish		X		
French	X			
Italian	X			
Portuguese	X			
German Including Hutterite German)	X			
Japanese	X			
Chinese	X			
Arabic	X			
Russian	X			

This information is updated annually through checking the following resources:

Data Sources for Languages Spoken in Affected	Website link to Data Source
Community	
U.S. Census Bureau	https://data.census.gov/topics.html

#### Beneficiary Diversity.

GAA does not currently collect demographic information from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport and GAA board members but will begin through voluntary disclosures.

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

• The Airport currently collects survey information beyond the passenger checkpoint to gauge passenger satisfaction with airport concessions, restroom cleanliness, food offerings, and other

<sup>&</sup>lt;sup>9</sup> Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan's 3-year period.

- elements and services. The survey will include a voluntary request for demographic information.
- Participants, pre-bid meetings, and other public meetings will be asked to complete an anonymous survey that includes demographic information.
- Job applicants will be asked to submit a voluntary request for demographic information during the application process.
- Board members may be asked to complete a voluntary demographic information.

#### Staff and Advisory Board Diversity.

GAA collects demographic information from airport employees through voluntary disclosures.

#### **Description of Employee Demographic**

• Job applicants are asked to submit voluntary demographic information when submitting their job application through the job application website.

### 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 GAA activity will have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.<sup>10</sup>

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

#### **Existing Airport Facilities**

# Affected Community Impacted by Operation of the Facility

RWY 12/30	Bozeman/ Belgrade CCD
RWY 11/29	Belgrade CCD
Airport Commercial Terminal	Bozeman/Belgrade CCD
FBO's	Bozeman/ Belgrade CCD
Flight Schools	Belgrade CCD
Rental Car Facility	Bozeman/ Belgrade CCD

<sup>&</sup>lt;sup>10</sup> In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

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

Northside Hangar Development	Belgrade CCD
Relocation of Airport Road	Belgrade CCD
Terminal Expansion	Bozeman/ Belgrade CCD
TWY Bravo	Bozeman/ Belgrade CCD
RWY 12/30 Expansion	Bozeman/ Belgrade CCD
NAVAID Relocation	N/A

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: **None.** 

# 8. Limited English Proficiency (LEP)

Executive Order 13166

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

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
None		

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities that meet the Safe Harbor thresholds. **None** 

Frequency of contact with LEP individuals at the airport and airport-related activities:

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
Spanish		X		
French	X			
Italian	X			
Portuguese	X			
German Including Hutterite German)	X			
Japanese	X			

Chinese	X		
Arabic	X		
Russian	X		

GAA currently does not collect data for languages spoken by airport guests but will monitor increase in LEP contact.

Additionally, the Coordinator will inform leadership and staff of GAA's responsibility to provide language access. The 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 GAA'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:**

**Translation Vendors** 

• The following vendors have been identified for written translations: None.

Languages

N/A	
<b>Location for Translation Assistance</b>	Languages
Language Identification Cards and	Numerous
information on Airport website and	
printed versions at airport information	

#### **Interpretation Services:**

desk.

• The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Language Line Services, Inc.	All languages

• Information regarding interpretation services can be obtained at:

Location for Interpretation	Languages
Assistance	
Airport Office open 0800-1630	All languages
Monday through Friday	
Public Safety Officers located at the	All languages
screening checkpoint and in the	
terminal 24 hours daily.	

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

• The airport employs two staff members who speak Spanish; the airport has Language Identification Cards, I-Speak on its website and contract with Language Line Services, INC. to provide on-demand telephone translation services for airport guests. Airport staff and public safety use I-Speak cards to identify language spoken. Airport staff and public safety then contact Language Line Services via tablet or mobile device to request appropriate language assistance.

# 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. There are no specific minority or disadvantage communities within the Affected Communities.

We have coordinated with local 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.

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing
None	None	None

# 10. Minority Businesses

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

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

Airport Business Opportunity	Minority Business Outreach Methods
Food and Beverage	AAAE advertisements, community meetings, local newspaper, civic presentations, local chamber of commerce, women and minority owned businesses
Parking Management	AAAE advertisements, community meetings, local newspaper, civic presentations, local chamber of commerce, women and minority owned businesses

Rental Car Concessions	AAAE advertisements, community meetings, local newspaper, civic presentations, local chamber of commerce, women and minority owned
	businesses

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 Coordinator in the Airport Office.

# 11. Training

New employee orientation incorporates Title VI training. Topics include:

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

Refresher information will be provided 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, GAA 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 GAA including airport employees, contractors, concessionaires, lessees, or tenants.
- 4. Concern an airport facility or actions by GAA including airport employees, contractors, concessionaires, lessees, or tenants.

<sup>&</sup>lt;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 airport sponsor or any of its sub-recipients by any State, local or Federal agency.

<sup>&</sup>lt;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 airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>&</sup>lt;sup>13</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

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

<u>Receipt of Complaint</u>. The Coordinator will log in the complaint and promptly send copies of the complaint to the Chief Executive Officer.

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

# Aaron Collins- Title VI Coordinator 850 Gallatin Field Road, Suite 6, Belgrade, MT 59714 (406)898-3609 aaron.collins@bozemanairport.com

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

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

#### **Discrimination Complaint Referral Procedure**

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

<u>Initial FAA Notification</u>. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will upload the complaint 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**

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

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

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

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

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

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

<u>Prompt Resolution of Disputes</u>. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through negation or mediation.

<u>Forwarding Report and Response to Complainant</u>. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state GAA's conclusion regarding whether unlawful discrimination occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

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

- The complainant may appeal in writing to the Chief Executive Officer (CEO).
- The written appeal must be received within thirty (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 CEO will issue a final written decision in response to the appeal.

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

<u>Intimidation and Retaliation Prohibited</u>. GAA 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 Aaron Collins, Title VI Coordinator at aaron.collins@bozemanairport.com . (406) 898-3609.

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

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

- 1 Bozeman Yellowstone International Airport website: https://bozemanairport.com/content/documents/Title-VI-Complaint-Form.pdf
- 2 Upon request from Title VI Coordinator aaron.collins@bozemanairport.com (406)898-3609
- **3** Via US Mail: Aaron Collins Title VI Coordinator, 850 Gallatin Field Road, Suite 6, Belgrade MT, 59714

# 14. Population / Language Data

# <u>\$1701:</u>

	Gallatin County, Montana						
	Total		Below poverty level		Percent below poverty level		
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	
Population for whom poverty status is determined	123,053	±217	8,536	±2,218	6.9%	±1.8	
AGE							
Under 18 years	22,778	±317	959	±849	4.2%	±3.7	
Under 5 years	4,936	±333	72	±127	1.5%	±2.6	
5 to 17 years	17,842	±405	887	±846	5.0%	±4.7	
Related children of householder under 18 years	22,778	±317	959	±849	4.2%	±3.7	
18 to 64 years	82,447	±406	6,161	±1,788	7.5%	±2.2	
18 to 34 years	37,738	±1,012	4,445	±1,667	11.8%	±4.4	
35 to 64 years	44,709	±1,012	1,716	±648	3.8%	±1.5	
60 years and over	23,610	±1,019	1,849	±872	7.8%	±3.7	
65 years and over	17,828	±296	1,416	±775	7.9%	±4.3	
SEX							
Male	64,167	±926	3,638	±1,132	5.7%	±1.8	
Female	58,886	±927	4,898	±1,636	8.3%	±2.7	
RACE AND HISPANIC OR LATINO ORIGIN							
White alone	109,159	±1,869	6,976	±2,055	6.4%	±1.9	

Black or African American alone	N	N	N	N	N	N
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	N	N	N	N	N	N
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	N	N	N	N	N	N
Two or more races	10,280	±1,979	1,044	±662	10.2%	±6.7
Hispanic or Latino origin (of any race)	N	N	N	N	N	N
White alone, not Hispanic or Latino	107,715	±1,684	6,935	±2,053	6.4%	±1.9
EDUCATIONAL ATTAINMENT						
Population 25 years and over	84,137	±572	4,259	±1,310	5.1%	±1.6
Less than high school graduate	2,085	±1,076	161	±162	7.7%	±9.4
High school graduate (includes equivalency)	10,164	±1,863	930	±527	9.1%	±5.0
Some college, associate's degree	22,666	±2,262	1,238	±565	5.5%	±2.4
Bachelor's degree or higher	49,222	±3,128	1,930	±763	3.9%	±1.5
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	77,420	±1,999	4,342	±1,616	5.6%	±2.1
Employed	76,179	±2,056	3,855	±1,511	5.1%	±2.0

Male	40,303	±1,718	1,138	±614	2.8%	±1.5
Female	35,876	±1,592	2,717	±1,415	7.6%	±3.8
Unemployed	1,241	±494	487	±323	39.2%	±20.0
Male	905	±417	226	±179	25.0%	±18.0
Female	336	±303	261	±265	77.7%	±40.8
WORK EXPERIENCE						
Population 16 years and over	102,974	±753	7,577	±2,010	7.4%	±1.9
Worked full-time, year-round in the past 12 months	51,678	±3,196	827	±608	1.6%	±1.2
Worked part-time or part-year in the past 12 months	30,302	±3,067	4,243	±1,742	14.0%	±5.2
Did not work	20,994	±1,837	2,507	±895	11.9%	±4.2
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	4,507	±1,504	(X)	(X)	(X)	(X)
125 percent of poverty level	11,972	±2,727	(X)	(X)	(X)	(X)
150 percent of poverty level	16,053	±3,398	(X)	(X)	(X)	(X)
185 percent of poverty level	20,199	±3,618	(X)	(X)	(X)	(X)
200 percent of poverty level	23,018	±3,871	(X)	(X)	(X)	(X)
300 percent of poverty level	41,940	±4,671	(X)	(X)	(X)	(X)

400 percent of poverty level	58,953	±5,109	(X)	(X)	(X)	(X)
500 percent of poverty level	72,909	±4,666	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	38,135	±3,691	5,801	±1,860	15.2%	±4.7
Male	21,273	±2,538	2,205	±926	10.4%	±4.2
Female	16,862	±2,146	3,596	±1,494	21.3%	±8.2
15 years	0	±185	0	±185	-	**
16 to 17 years	0	±185	0	±185	-	**
18 to 24 years	11,081	±1,592	3,253	±1,466	29.4%	±12.1
25 to 34 years	12,421	±2,041	992	±624	8.0%	±4.9
35 to 44 years	3,862	±1,064	498	±337	12.9%	±8.4
45 to 54 years	3,036	±1,477	251	±206	8.3%	±7.9
55 to 64 years	2,863	±960	243	±193	8.5%	±6.8
65 to 74 years	2,610	±839	305	±215	11.7%	±8.2
75 years and over	2,262	±565	259	±224	11.5%	±9.2
Mean income deficit for unrelated individuals (dollars)	9,064	±1,000	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	20,819	±3,309	751	±599	3.6%	±2.9
Worked less than full-time, year- round in the past 12 months	12,715	±2,152	3,709	±1,709	29.2%	±11.0
Did not work	4,601	±968	1,341	±599	29.1%	±10.1

Population in	122,829	±223	8,385	±2,215	6.8%	±1.8
housing units for						
whom poverty						
status is						
determined						

# B16001:

	Gallatin County, Mo	ntana
Label	Estimate	Margin of Error
Total:	89,562	±86
Speak only English	85,935	±438
Spanish or Spanish Creole:	1,648	±310
Speak English "very well"	1,125	±258
Speak English less than "very		
well"	523	±191
French (incl. Patois, Cajun):	237	±95
Speak English "very well"	215	±92
Speak English less than "very		
well"	22	±20
French Creole:	43	±44
Speak English "very well"	43	±44
Speak English less than "very		
well"	0	±23
Italian:	59	±38
Speak English "very well"	59	±38
Speak English less than "very		
well"	0	±23
Portuguese or Portuguese		
Creole:	5	±10
Speak English "very well"	5	±10
Speak English less than "very		
well"	0	±23
German:	370	±145
Speak English "very well"	343	±143
Speak English less than "very		
well"	27	±20
Yiddish:	0	±23
Speak English "very well"	0	±23

Speak English less than "very		
well"	0	±23
Other West Germanic		
languages:	77	±61
Speak English "very well"	72	±60
Speak English less than "very		
well"	5	±10
Scandinavian languages:	66	±46
Speak English "very well"	55	±31
Speak English less than "very		
well"	11	±21
Greek:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Russian:	60	±46
Speak English "very well"	52	±43
Speak English less than "very		
well"	8	±12
Polish:	15	±18
Speak English "very well"	15	±18
Speak English less than "very		
well"	0	±23
Serbo-Croatian:	49	±33
Speak English "very well"	43	±32
Speak English less than "very		
well"	6	±10
Other Slavic languages:	14	±16
Speak English "very well"	10	±15
Speak English less than "very		_
well"	4	±5
Armenian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Persian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very	•	
well"	0	±23
Gujarati:	0	±23
Speak English "very well"	0	±23
Speak English less than "very	0	122
well"	0	±23
Hindi:	0	±23

Speak English "very well"  Speak English less than "very	0	±23
well"	0	±23
Urdu:	5	±8
Speak English "very well"	5	±8
Speak English less than "very		_0
well"	0	±23
Other Indic languages:	63	±59
Speak English "very well"	15	±22
Speak English less than "very	-	
well"	48	±54
Other Indo-European		
languages:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Chinese:	105	±64
Speak English "very well"	79	±55
Speak English less than "very		
well"	26	±26
Japanese:	124	±119
Speak English "very well"	43	±48
Speak English less than "very		
well"	81	±112
Korean:	114	±90
Speak English "very well"	37	±39
Speak English less than "very		
well"	77	±62
Mon-Khmer, Cambodian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Hmong:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Thai:	2	±3
Speak English "very well"	0	±23
Speak English less than "very		
well"	2	±3
Laotian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23

Vietnamese:	0	±23
Speak English "very well"	0	±23
Speak English less than "very		
well"	0	±23
Other Asian languages:	51	±41
Speak English "very well"	18	±22
Speak English less than "very		
well"	33	±27
Tagalog:	156	±102
Speak English "very well"	153	±102
Speak English less than "very		
well"	3	±6
Other Pacific Island languages:	38	±43
Speak English "very well"	34	±44
Speak English less than "very		
well"	4	±8
Navajo:	3	±7
Speak English "very well"	3	±7
Speak English less than "very		
well"	0	±23
Other Native North American	440	. 70
languages:	110	±70
Speak English "very well"	110	±70
Speak English less than "very	0	. 22
well"	0	±23
Hungarian:	13 13	±21 ±21
Speak English "very well"	12	121
Speak English less than "very well"	0	±23
Arabic:	144	±116
Speak English "very well"	92	±98
Speak English less than "very	32	±30
well"	52	±57
Hebrew:	5	±11
Speak English "very well"	5	±11
Speak English less than "very	•	
well"	0	±23
African languages:	35	±34
Speak English "very well"	34	±34
Speak English less than "very		
well"	1	±2
Other and unspecified		
languages:	16	±26
Speak English "very well"	16	±26

Speak English less than "very well" 0 ±23

# 15. Completed Unlawful Discrimination Poster

#### Unlawful Discrimination

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

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

Federal regulations on unlawful discrimination are available for review in the Airport Directors Office

or:

Title VI Coordinator – Aaron Collins ADA/504 Coordinator – Rachel Peavyhouse

Phone – (406) 388-6632 ext. 109 Phone – (406) 388-6632 ext. 279

Address – 850 Gallatin Field Rd, Suite 6 Address - 850 Gallatin Field Rd, Suite 6

Belgrade, MT 59714 Belgrade, MT 59714

E-mail- aaron.collins@bozemanairport.com e-mail – rachel.peavyhouse@bozemanairport.com

#### Discriminacion Ilegal

Se prohibe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento fisico o discapacidad en lo que respecta a servicios p!blicos 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-I

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.

Title VI Coordinator – Aaron Collins Phone – (406) 388-6632 ext. 109 Address – 850 Gallatin Field Rd, Suite 6 Belgrade, MT 59714 E-mail- aaron.collins@bozemanairport.com ADA/504 Coordinator – Rachael Peavyhouse Phone – (406) 388-6632 ext. 279 Address - 850 Gallatin Field Rd, Suite 6 Belgrade, MT 59714 e-mail – rachael.peavyhouse@bozemanairport.com



U.S. Department of Transportation

**Federal Aviation Administration**