

Bishop International Airport Authority Title VI Plan

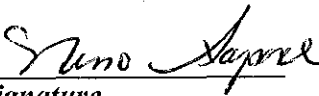
1. Title VI Policy Statement¹

Bishop International Airport Authority “hereinafter BIAA” 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.

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

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

Christopher Yeates, A.A.E. – Chief Operating Officer, available at 810-235-6560 and cyeates@bishopairport.org, is responsible for overseeing BIAA’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.


Signature
Nino Sapone, A.A.E.
Chief Executive Officer

2/28/2024
Effective Date

2/28/2027
3-Year Expiration Date

¹ This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

2. Administration

The Bishop International Airport Authority Board of Directors has reviewed and adopted this Title VI Plan for Bishop International Airport Authority “hereinafter BIAA”. 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 Chief Executive Officer’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the BIAA Board of Directors and resubmittal to FAA.

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

Staff Supporting Title VI Program	Airport Sponsor Program / Office
<i>None</i>	

BIAA has the following airport program sub-recipients:

Sub-Recipients
<i>None</i>

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

Federal Source	Grant Number	Amount
<i>None</i>		

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

Federal Source	Grant Award Information Available at:
<i>FAA AIP</i>	<i>https://www.faa.gov/airport/aip/</i>

3. Grant and Procurement Assurances

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

BIAA 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.

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/. 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. BIAA requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. This is expressed in contracts, leases and agreements and verified through periodic checks of sub-recipient and sub-contractor agreements.

Description of Oversight Methods for Subcontracts

Subcontract contract provisions templates must be used in all subcontracts related to the airport program. Subcontracts are audited by the Title VI Coordinator to verify they include the template language, for not less than 10 percent of contracts and agreements 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 BIAA is in compliance with nondiscrimination requirements of Title VI and reports to BIAA 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 Title VI 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)

BIAA 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,² and maintained. The poster template is available at

https://www.faa.gov/about/office_org/headquarters_offices/act/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 15 Appendix.

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

² For more information about website accessibility, please visit ADA.gov.

BIAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by December 31, 2024, by means of email, at tenant meetings, and construction meetings.

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

Terminal/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
<i>Terminal Building</i>	2	2	

Outreach to Affected Communities

The office of the Chief Executive Officer ensures that notices for public meetings reach all segments of the impacted community. The Title VI Coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and posted on airport website. The Chief Executive Officer, or designee, contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ 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.

BIAA will create a detailed CPP by December 31, 2025. A copy of the plan will be available at <https://www.bishopairport.org/>.

To ensure that the community is effectively informed of and able to participate in public hearings, the office of the Chief Executive Officer 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

³ 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, BIAA will be able to identify, understand, and engage with communities. In doing so, BIAA needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by BIAA’s airport program.

Affected Communities⁴	Population (est.)
<i>City of Flint</i>	77,448
<i>Flint Township</i>	30,576
<i>Burton</i>	29,3167
<i>Mundy Township</i>	15,120
<i>Swartz Creek</i>	5,835

See S1701: Poverty Status in the Past 12 Months for each Affected Community

(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 Communities⁵.

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,” BIAA is collecting information about affected and potentially affected low-income communities. According to the *U.S. Census Bureau*, the overall poverty level for Genesee County is approximately 16.4%. The poverty rate remains high compared with the rest of the State of Michigan (13.4%) and United States of America (12.6%). The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
<i>City of Flint</i>	37.9%
<i>Flint Township</i>	17.6%
<i>Burton</i>	16.2%
<i>Mundy Township</i>	4.9%
<i>Swartz Creek</i>	7.0%

See S1701: Poverty Status in the Past 12 Months for each Affected Community

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

⁴ “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.

⁵ 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.

race, color, or national origin for the specific Affected Communities are as follows⁶:

Affected Community: City of Flint
Total Affected Community Population: 77,448

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	27,444	33.2%
<i>Black or African American</i>	44,731	56.7%
<i>American Indian or Alaska Native</i>	N/A	0.5%
<i>Asian</i>	N/A	0.5%
<i>Native Hawaiian or Other Pacific Islander</i>	N/A	0.0%
<i>Hispanic or Latino</i>	N/A	4.5%
<i>Two or more races</i>	3,574	6.8%

See S1701: Poverty Status in the Past 12 Months and QuickFacts for City of Flint

Affected Community: Flint Township
Total Affected Community Population: 30,576

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	18,058	59.5%
<i>Black or African American</i>	9,594	31.0%
<i>American Indian or Alaska Native</i>	103	0.4%
<i>Asian</i>	410	1.4%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	1,013	3.3%
<i>Two or more races</i>	1,605	5.2%

See S1701: Poverty Status in the Past 12 Months and QuickFacts for Flint Township

Affected Community: Burton
Total Affected Community Population: 29,316

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	23,700	80.9%
<i>Black or African American</i>	2,586	8.8%
<i>American Indian or Alaska Native</i>	122	0.4%
<i>Asian</i>	426	1.4%
<i>Native Hawaiian or Other Pacific Islander</i>	29	0.1%
<i>Hispanic or Latino</i>	1,228	4.2%
<i>Two or more races</i>	1,293	4.4%

⁶ Recommend using demographic groups from the U.S. Census.

See S1701: Poverty Status in the Past 12 Months and QuickFacts for Burton

Affected Community: Mundy Township
Total Affected Community Population: 15,120

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	13,117	86.6%
<i>Black or African American</i>	1,144	7.5%
<i>American Indian or Alaska Native</i>	12	0.1%
<i>Asian</i>	126	0.8%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	424	3.0%
<i>Two or more races</i>	472	3.1%

See S1701: Poverty Status in the Past 12 Months and QuickFacts for Mundy Township

Affected Community: Swartz Creek
Total Affected Community Population: 5,835

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	5,419	92.9%
<i>Black or African American</i>	59	1.0%
<i>American Indian or Alaska Native</i>	0	0.0%
<i>Asian</i>	42	0.7%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	202	3.5%
<i>Two or more races</i>	136	2.3%

See S1701: Poverty Status in the Past 12 Months and QuickFacts for Swartz Creek

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that BIAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is from American Community Survey Table B16001 for Genesee County.

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.⁸ The

⁷ 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.

⁸ 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.

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	Number	Margin of Error
<i>Spanish</i>	1,018	+/-224

See Table B16001: Language Spoken at Home by Ability to Speak English

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		
Arabic		X		
Chinese		X		
Urdu	X			
German	X			
Korean	X			
Hindi	X			
French	X			
Russian	X			
Greek	X			
Tagalog	X			
Polish	X			
Gujarati	X			
Hmong	X			
Hungarian	X			
Italian	X			
Serbo-Croatian	X			
Vietnamese	X			
Japanese	X			
Armenian	X			
Native North American	X			

See Table B16001: Language Spoken at Home by Ability to Speak English for Genesee County

This information is updated annually⁹ through checking the following resources:

⁹ 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.

Data Sources for Languages Spoken in Affected Community

Website link to Data Source

<i>U.S. Census Bureau</i>	https://data.census.gov/table?q=B16001&g=050XX00US26049

Beneficiary Diversity.

Demographic information is collected from airport customers and attendees at community meetings through voluntary disclosures.

Description of Beneficiary Demographic Information Collection Methods

- *BIAA conducts surveys via wifi access of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes an opportunity to voluntarily submit demographic information.*
- *Participants at public airport meetings are provided an opportunity to voluntarily submit demographic information.*

Staff and Advisory Board Diversity.

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures.

Description of Employee and Advisory Board Demographic Information Collection Methods

- *Employees are provided the opportunity to voluntarily submit demographic information at time of hiring.*
- *All board members are provided the opportunity to voluntarily submit demographic information.*

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 BIAA 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.¹⁰

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
<i>Runway 9-27</i>	<i>Burton, Swartz Creek, Flint Township, City of Flint</i>
<i>Runway 18-36</i>	<i>Flint Township, Mundy Township, City of Flint</i>
<i>Taxiways & Aprons</i>	<i>None</i>
<i>Terminal Building</i>	<i>Flint Township</i>
<i>Parking Lots and Access Roads</i>	<i>Flint Township</i>
<i>Golf T-Hangars</i>	<i>Mundy Township</i>
<i>FAA Control Tower</i>	<i>Mundy Township</i>
<i>Airport NAVAIDs</i>	<i>None</i>
<i>Aircraft Storage Hangars</i>	<i>Flint Township</i>
<i>Aircraft Fuel Farm</i>	<i>Flint Township</i>

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
<i>Terminal Building Interior Rehabilitations</i>	<i>None</i>
<i>ARFF Station Replacement</i>	<i>None</i>
<i>Hangar Rehabilitation</i>	<i>None</i>
<i>Corporate Aviation Development</i>	<i>Flint Township</i>
<i>Obstruction Removal</i>	<i>Mundy Township, Flint Township, City of Flint</i>
<i>Airport Drainage Improvement</i>	<i>None</i>
<i>Terminal Building Roof Rehabilitation</i>	<i>None</i>
<i>Terminal Access Drive and Parking Lot Rehabilitations</i>	<i>Flint Township</i>

¹⁰ 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.

<i>Terminal Apron Rehabilitation</i>	<i>None</i>
<i>Rental Car Facility Relocation</i>	<i>Flint Township</i>

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?
<i>None</i>		

Justifications:

Facilities or Construction Projects	Justification
<i>N/A</i>	<i>N/A</i>

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, BIAA 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
<i>Spanish</i>

BIAA also collects data for languages spoken by airport guests.¹¹ Data sources include:

Data Sources for Languages Spoken by	Website link to Data
---	-----------------------------

¹¹ 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.

Airport Guests	Source
<i>Assistance requests to Airport Employees</i>	<i>N/A</i>

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

Language
<i>None</i>

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 BIAA of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

Translation Services:

- All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
- The following vendors have been identified for written translations:

Translation Vendors	Languages
<i>None</i>	

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>Airport Administration Office</i>	<i>All above languages</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Google Translate</i>	<i>All above languages</i>
<i>FreeTranslations.org</i>	<i>All above languages</i>

<i>Language Line, Inc.</i>	<i>All above languages</i>
----------------------------	----------------------------

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Airport Public Safety Office</i>	<i>All above languages</i>
<i>Airport Administration Office</i>	<i>All above languages</i>

Description of Interpretation Assistance Processes

- *BIAA maintains access to a list of translation and interpretation services. The list indicates whether each service is proficient to provide interpretation and/or translation services. The list is updated annually and provided to all airport employees. Generally, employees are available to assist members of the public with verbal real-time interpretation, during normal business hours.*
- *The airport contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests.*

9. Transportation

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

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

We have coordinated with Mass Transportation Authority (MTA) 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
<i>City of Flint – ALL</i>	<i>Fixed-route buses</i>	<i>Existing</i>
<i>Flint Township – ALL</i>	<i>Fixed-route buses, On-Demand Transit</i>	<i>Existing</i>
<i>Burton</i>	<i>Fixed-route buses, On-Demand Transit</i>	<i>Existing</i>
<i>Swartz Creek</i>	<i>On-Demand Transit</i>	<i>Existing</i>

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
<i>Parking Lot Management</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Snow Removal Services</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Janitorial Services</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Food and Beverage Concessionaire</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Retail Concessionaire</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Rental Car Agencies</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Airport Advertising</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Environmental Compliance Consulting</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Architectural and Engineering Consulting</i>	<i>All solicitations are locally advertised through chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>
<i>Airport Planning Consulting</i>	<i>All solicitations are locally advertised through channels such as the chambers of commerce, airport webpage, and area newspapers. All proposals, bids, and statements of qualifications require the inclusion of disadvantaged businesses as contractors or subcontractors or evidence of good-faith efforts.</i>

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 employee soliciting services.

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 requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

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, BIAA 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)

¹² 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.

¹³ 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

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 matters¹⁴
3. Allege misconduct by BIAA including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the BIAA 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 BIAA.¹⁵ 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 Title VI Coordinator will log in the complaint and promptly send copies of the complaint to Chief Executive Officer, Chief Financial Officer, Human Resource, department director of individual listed in complaint.

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

Christopher Yeates – Chief Operating Officer – Title VI Coordinator
3425 West Bristol Road, Flint, MI 48057 / 810-235-6560 / cyeates@bishopairport.org

If a complaint is initially made by phone, it must be supplemented with a written complaint before 90 days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

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

employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

¹⁴ 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.

¹⁵

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 Title VI Coordinator within 5 days.

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 Title VI Coordinator was notified). The Title VI 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 Title VI Coordinator will upload details of the complaint to the FAA Civil Rights Connect System to notify appropriate FAA staff. The Title VI Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

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

Prompt Investigation. The Title VI Coordinator will make every effort to complete discrimination complaint investigations within 90 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 Title VI 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 Title VI Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Title VI 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 Title VI Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other

persons, through direct discussions and negotiations. If the dispute cannot be resolved through discussions and negotiations, it will be submitted to arbitration in accordance with proceedings under American Arbitration Association Commercial Arbitration Rules within the State of Michigan.

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 BIAA'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 Airport Chief Executive Officer.
- The written appeal must be received within 14 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 Chief Executive Officer 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, BIAA will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. BIAA 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 the Title VI Coordinator.

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

Website, In-person, and Other Distribution Methods

1 Airport website, Documents, Forms and Guidelines page at www.bishopairport.org/doing-business/doing-business-overview/fnt-business-opportunities/documents-forms-and-guidelines

14. Population / Language Data

Table: ACSDT5Y2015.B16001

	Genesee County, Michigan	
Label	Estimate	Margin of Error
Total:	390,375	*****
Speak only English	376,817	±922
Spanish or Spanish Creole:	4,356	±459
Speak English "very well"	3,338	±398
Speak English less than "very well"	1,018	±224
French (incl. Patois, Cajun):	864	±181
Speak English "very well"	743	±169
Speak English less than "very well"	121	±65
French Creole:	25	±25
Speak English "very well"	18	±22
Speak English less than "very well"	7	±13
Italian:	149	±68
Speak English "very well"	110	±59
Speak English less than "very well"	39	±42
Portuguese or Portuguese Creole:	36	±37
Speak English "very well"	36	±37
Speak English less than "very well"	0	±23
German:	690	±154
Speak English "very well"	545	±127
Speak English less than "very well"	145	±70
Yiddish:	0	±23
Speak English "very well"	0	±23
Speak English less than "very well"	0	±23
Other West Germanic languages:	73	±53
Speak English "very well"	73	±53
Speak English less than "very well"	0	±23
Scandinavian languages:	66	±62
Speak English "very well"	66	±62
Speak English less than "very well"	0	±23
Greek:	365	±222
Speak English "very well"	260	±177
Speak English less than "very well"	105	±81

Table: ACSDT5Y2015.B16001

	Genesee County, Michigan	
Label	Estimate	Margin of Error
Russian:	260	±144
Speak English "very well"	147	±109
Speak English less than "very well"	113	±75
Polish:	265	±119
Speak English "very well"	202	±115
Speak English less than "very well"	63	±53
Serbo-Croatian:	60	±43
Speak English "very well"	26	±26
Speak English less than "very well"	34	±33
Other Slavic languages:	222	±130
Speak English "very well"	185	±85
Speak English less than "very well"	37	±57
Armenian:	42	±58
Speak English "very well"	34	±44
Speak English less than "very well"	8	±16
Persian:	34	±39
Speak English "very well"	34	±39
Speak English less than "very well"	0	±23
Gujarati:	189	±179
Speak English "very well"	137	±119
Speak English less than "very well"	52	±65
Hindi:	367	±244
Speak English "very well"	237	±161
Speak English less than "very well"	130	±115
Urdu:	377	±288
Speak English "very well"	224	±156
Speak English less than "very well"	153	±149
Other Indic languages:	144	±93
Speak English "very well"	144	±93
Speak English less than "very well"	0	±23
Other Indo-European languages:	86	±47
Speak English "very well"	47	±38

Table: ACSDT5Y2015.B16001

Genesee County, Michigan		
Label	Estimate	Margin of Error
Speak English less than "very well"	39	±34
Chinese:	1,039	±386
Speak English "very well"	496	±282
Speak English less than "very well"	543	±170
Japanese:	56	±37
Speak English "very well"	45	±33
Speak English less than "very well"	11	±17
Korean:	204	±101
Speak English "very well"	73	±52
Speak English less than "very well"	131	±90
Mon-Khmer, Cambodian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very well"	0	±23
Hmong:	41	±39
Speak English "very well"	0	±23
Speak English less than "very well"	41	±39
Thai:	0	±23
Speak English "very well"	0	±23
Speak English less than "very well"	0	±23
Laotian:	0	±23
Speak English "very well"	0	±23
Speak English less than "very well"	0	±23
Vietnamese:	51	±48
Speak English "very well"	20	±23
Speak English less than "very well"	31	±41
Other Asian languages:	149	±93
Speak English "very well"	121	±89
Speak English less than "very well"	28	±35
Tagalog:	324	±172
Speak English "very well"	235	±153
Speak English less than "very well"	89	±70

Table: ACSDT5Y2015.B16001

	Genesee County, Michigan	
Label	Estimate	Margin of Error
Other Pacific Island languages:	64	±43
Speak English "very well"	64	±43
Speak English less than "very well"	0	±23
Navajo:	0	±23
Speak English "very well"	0	±23
Speak English less than "very well"	0	±23
Other Native North American languages:	52	±44
Speak English "very well"	47	±43
Speak English less than "very well"	5	±8
Hungarian:	104	±48
Speak English "very well"	63	±38
Speak English less than "very well"	41	±31
Arabic:	2,281	±545
Speak English "very well"	1,552	±420
Speak English less than "very well"	729	±234
Hebrew:	108	±83
Speak English "very well"	108	±83
Speak English less than "very well"	0	±23
African languages:	168	±153
Speak English "very well"	168	±153
Speak English less than "very well"	0	±23
Other and unspecified languages:	247	±114
Speak English "very well"	176	±81
Speak English less than "very well"	71	±62

Table: ACSST1Y2022.S1701

Genesee County, Michigan						
	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	396,818	±777	64,988	±6,826	16.4%	±1.7
AGE						
Under 18 years	86,429	±770	20,849	±3,520	24.1%	±4.1
Under 5 years	22,021	±549	5,976	±1,435	27.1%	±6.4
5 to 17 years	64,408	±910	14,873	±2,850	23.1%	±4.4
Related children of householder under 18 years	86,312	±791	20,732	±3,515	24.0%	±4.1
18 to 64 years	236,026	±483	36,859	±4,168	15.6%	±1.8
18 to 34 years	85,209	±1,189	14,156	±2,169	16.6%	±2.6
35 to 64 years	150,817	±1,226	22,703	±2,795	15.1%	±1.8
60 years and over	104,006	±2,019	11,556	±1,888	11.1%	±1.8
65 years and over	74,363	±497	7,280	±1,278	9.8%	±1.7
SEX						
Male	191,810	±706	28,616	±4,065	14.9%	±2.1
Female	205,008	±815	36,372	±3,856	17.7%	±1.9
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	287,989	±2,204	39,126	±5,869	13.6%	±2.1
Black or African American alone	77,204	±2,557	22,532	±3,437	29.2%	±4.5
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	22,028	±3,397	2,230	±1,039	10.1%	±4.8
Hispanic or Latino origin (of any race)	15,923	±127	2,055	±853	12.9%	±5.4
White alone, not Hispanic or Latino	280,778	±1,523	38,199	±5,846	13.6%	±2.1
EDUCATIONAL ATTAINMENT						
Population 25 years and over	277,834	±533	38,268	±3,952	13.8%	±1.4
Less than high school graduate	26,312	±2,604	8,146	±1,332	31.0%	±4.4
High school graduate (includes equivalency)	83,555	±4,129	14,360	±2,407	17.2%	±2.5
Some college, associate's degree	101,460	±4,029	12,688	±2,460	12.5%	±2.3
Bachelor's degree or higher	66,507	±3,487	3,074	±1,235	4.6%	±1.8
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	196,640	±4,040	19,293	±2,878	9.8%	±1.5
Employed	180,801	±4,389	12,525	±2,209	6.9%	±1.2
Male	90,321	±3,288	5,700	±1,586	6.3%	±1.7

Table: ACSST1Y2022.S1701

Genesee County, Michigan						
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Female	90,480	±2,999	6,825	±1,261	7.5%	±1.4
Unemployed	15,839	±2,456	6,768	±1,863	42.7%	±8.0
Male	8,994	±1,909	3,420	±1,347	38.0%	±11.5
Female	6,845	±1,660	3,348	±1,248	48.9%	±11.6
WORK EXPERIENCE						
Population 16 years and over	320,441	±903	45,852	±4,650	14.3%	±1.4
Worked full-time, year-round in the past 12 months	123,991	±4,371	2,734	±1,119	2.2%	±0.9
Worked part-time or part-year in the past 12 months	73,761	±4,225	13,676	±2,178	18.5%	±2.9
Did not work	122,689	±4,350	29,442	±3,329	24.0%	±2.3
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	33,095	±4,461	(X)	(X)	(X)	(X)
125 percent of poverty level	83,306	±7,817	(X)	(X)	(X)	(X)
150 percent of poverty level	97,899	±7,890	(X)	(X)	(X)	(X)
185 percent of poverty level	122,117	±8,101	(X)	(X)	(X)	(X)
200 percent of poverty level	131,455	±9,008	(X)	(X)	(X)	(X)
300 percent of poverty level	207,105	±8,718	(X)	(X)	(X)	(X)
400 percent of poverty level	266,419	±7,479	(X)	(X)	(X)	(X)
500 percent of poverty level	311,221	±6,117	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED						
89,058	±4,884	23,801	±2,756	26.7%	±2.6	
Male	42,897	±2,696	11,885	±1,733	27.7%	±3.9
Female	46,161	±3,537	11,916	±2,070	25.8%	±3.7
15 years	45	±75	45	±75	100.0%	±91.8
16 to 17 years	72	±86	72	±86	100.0%	±72.5
18 to 24 years	7,702	±1,751	2,894	±1,028	37.6%	±10.6
25 to 34 years	18,621	±2,139	4,218	±1,260	22.7%	±6.8
35 to 44 years	11,303	±1,927	3,327	±1,097	29.4%	±8.1
45 to 54 years	9,949	±1,866	3,807	±1,119	38.3%	±7.4
55 to 64 years	15,036	±1,517	4,786	±1,026	31.8%	±6.1
65 to 74 years	15,446	±1,866	3,720	±973	24.1%	±5.2
75 years and over	10,884	±1,269	932	±408	8.6%	±3.7
Mean income deficit for unrelated individuals (dollars)	8,725	±625	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	33,259	±3,471	909	±499	2.7%	±1.5
Worked less than full-time, year-round in the past 12 months	19,806	±2,513	7,446	±1,539	37.6%	±5.5
Did not work	35,993	±3,213	15,446	±2,169	42.9%	±4.0

Table: ACSST1Y2022.S1701

	Genesee County, Michigan					
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population in housing units for whom poverty status is determined	395,373	±778	64,290	±6,827	16.3%	±1.7

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Christopher Yeates, A.A.E.
Phone: 810-235-6560
Address: 3425 West Bristol Road, Flint, MI 48507

Discriminacion Illegal

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

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

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

Coordinador: Christopher Yeates, A.A.E.
Teléfono: 810-235-6560
Dirección: 3425 West Bristol Road, Flint, MI 48507



U.S. Department of Transportation
Federal Aviation Administration

15-00015