

1. Title VI Policy Statement¹

The Syracuse Regional Airport Authority (SRAA) 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.

The SRAA further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. The Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities the SRAA will take, actions to involve them and the general public in the decision-making process will be made.

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

Debi Marshall, available at 315-455-3636 or at marshalld@syraairport.org, 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.



Signature
H. Jason Terreri
Executive Director

April 5, 2024
Effective Date

April 5, 2027
3-Year Expiration Date

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

2. Administration

The SRAA Board of Directors has reviewed and adopted this Title VI Plan for SRAA. 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 Executive Director’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Board of Directors 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
Debi Marshall	Director of Human Resources
John Clark	General Counsel
Linda Ryan	Director of Business Development
Matt Szwejbka	Customer Experience Manager
Robin Watkins	Chief Financial Officer
Dawn O’Shaughnessy	Accounting and Contract Specialist

The SRAA has the following airport program sub-recipients:

Sub-Recipients
None

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

Federal Source	Grant Number	Amount
FAA	SYR-EAG-3-36-0114-168-2023	\$7,965,000
FAA	SYR-EAG-3-36-0114-167-2023	\$118,800
FAA	SYR-EAG-3-36-0114-169-2023	\$3,151,554
FAA	SYR-EAG-3-36-0114-165-2022	\$359,325
FAA	SYR-EAG-3-36-0114-160-2021	\$360,500
FAA	SYR-EAG-3-36-0114-166-2022	\$431,234

In addition, the SRAA 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
<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:
DHS	www.DHSgrantinfo.gov
DOJ	www.USgrantsinfo.net
FAA AIP	https://www.faa.gov/airports/aip/

3. Grant and Procurement Assurances

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

The SRAA 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. The SRAA requires, Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. All contracts will be reviewed for required language prior to execution by Director of Business Development, General Counsel and/or Accounting and Contract Specialist.

Description of Oversight Methods for Subcontracts

Prior to execution by SRAA, all agreements, contracts, leases, transfer agreements, solicitations, and similar instructions (collectively "agreements") are reviewed to ensure that such agreements contain all clauses and/or language required by FAA General Civil Rights Provisions and/or the Provisions of Title VI of the Civil Rights Act of 1964, as amended.

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 Director of Human Resources 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 the 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 can 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. Works with the Director of HR to identify any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

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

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

5. Notice

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

The SRAA 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.

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

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

The SRAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by April 8, 2024.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal A	2	3	
Terminal B	2	9	
Center	6	2	
Million Air (FBO)	1		
Freeman Jet Center	1		

Outreach to Affected Communities

The Customer Experience Manager 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 any other appropriate options. The Customer Experience Manager 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.

The Syracuse Regional Airport Authority will create a detailed CPP by **March 29, 2024**. A copy of the plan will be available at www.flysyracuse.com.

To ensure that the community is effectively informed of and able to participate in public hearings, the Customer Experience Manager 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

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the SRAA will be able to identify,

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.

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

Affected Communities⁴	Population
Town of Salina	33,372
Town of Dewitt	24,618
Town of Manlius	33,325
City of Syracuse	127,224
Town of Cicero	29,181

(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,” The SRAA is collecting information about affected and potentially affected low-income communities. According to US Census the overall poverty level for the County of Onondaga is approximately 13.8%. The poverty rate remains **similar** compared with the rest of the state. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
Town of Salina	10.4%
Town of Manlius	5.0%
Town of DeWitt	8.6%
Town of Cicero	8.6%
City of Syracuse	27.9%

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

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.

Affected Community: Town of Salina
Total Affected Community Population: 33,072

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	28,018	84.7%
Black or African American	1,072	3.2%
American Indian or Alaska Native	110	0.3%
Asian	1,340	4.0%
Native Hawaiian or Other Pacific Islander	5	
Hispanic or Latino	1,317	3.9%
More than one	2,020	6.1%

Affected Community: Town of Dewitt
Total Affected Community Population: 24,618

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	19,944	81%
Black or African American	1,719	6.9%
American Indian or Alaska Native	63	0.2%
Asian	1,009	4.0%
Native Hawaiian or Other Pacific Islander	26	0.1%
Hispanic or Latino	927	3.7%
More than one	1,643	6.6%

Affected Community: City of Syracuse
Total Affected Community Population: _____127,224_____

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	62,064	48.7%
Black or African American	36,871	28.9%
American Indian or Alaska Native		
Asian	6,858	5.3%
Native Hawaiian or Other Pacific Islander		
Hispanic or Latino	15,323	12%
More than one	16,705	13.1%

Affected Community: Town of Cicero
Total Affected Community Population: _____29,181_____

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	23,529	80.6%
Black or African American	1,771	6.0%
American Indian or Alaska Native	30	
Asian	823	2.8%
Native Hawaiian or Other Pacific Islander	0	
Hispanic or Latino	2,061	7.0%
More than one	2,674	9.1%

Affected Community: Town of Manlius
Total Affected Community Population: _____33,325_____

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	29,413	88.2%
Black or African American	493	1.4%
American Indian or Alaska Native	38	0.1%
Asian	1,514	4.5%
Native Hawaiian or Other Pacific Islander	2	
Hispanic or Latino	1,043	3.1%
More than one	1,337	4.0%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that the SRAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁶ that are spoken in LEP households in the Affected Communities. The data source is the U.S. Census Bureau.

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.⁷ The safe harbor for our community is [Calculate the safe harbor. If the total population in your area is 20,000 or greater, then the safe harbor is 1,000. If the total population in your area is less than 20,000, then the safe harbor will be 5% of the total population. For example, if your total population is 15,000, the safe harbor should be 750].

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
Onondaga County: Spanish	4280	497
Onondaga County: Indic Languages	1221	327
Onondaga County: Chinese	1958	311
Onondaga County: Other Asian Languages	1084	374
Oneida County: Spanish	2338	294
Oneida County: Serbo-Croatian	1744	276
Oneida County: Other Asian Languages	2638	601
Broome County: Spanish	1227	217

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages): N/A at this time. Will add language into customer surveys to obtain demographic information.

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)
<i>Spanish</i>				
<i>Indic Languages</i>				
<i>Chinese</i>				
<i>Serbo-Croatian</i>				
<i>Other Asian Languages</i>				

⁶ 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.

⁷ 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.

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

Additional Languages Spoken

N/A

This information is updated annually⁸ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
U.S. Census Bureau	https://data.census.gov/cedsci/table?q=B16001&tid=ACSDT1Y2019.B16001
Local public-school data	https://data.nysed.gov/profile.php?instid=800000040902

Beneficiary Diversity.

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

Description of Beneficiary Demographic Information Collection Methods

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

Staff and Advisory Board Diversity.

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

Description of Employee and Advisory Board Demographic Information Collection Methods

- *Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.*
- *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through an online survey.*

⁸ 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.

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 SRAA 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.⁹

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

⁹ 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.

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Admin Bldg, Terminal	None
Parking Garage, 3 elevators	none
6 Solar Panels	none
Former Fire Rescue (Storage)	none
Record Storage Bldg near former Fire Rescue	none
Sewage Treatment	none
Runway Elec Vault	none
Millionaire Facility	none
Fire Rescue Bldg.	none
Runway Elec Vault	none
Mohawk Global Logistics	none
Aeroterm Cargo Building	none
Aeroterm Cargo Building	none
Aeroterm Cargo Building	none
C&S Companies	none
NYS Police Barracks	none
Property Maintenance & Storage	none
Snow Removal Equip Storage	none

Fuel Tank & Pumps	none
Snow Removal Equip Storage	none
Sand Storage	none
Fuel Farm	none
T Hangar	none
Hangar / Garage	none
Hangar / Office	none
Hangar / Office	none
Hangar / Office	none
Hangar / Office	none
GSE Storage / Maint	none
GSE Storage / Maint Fire Barn	none
Hangar / Office	none
MRO Hangar	none
FBO T Hangar West	none
FBO Terminal / Hangars	none
FBO T Hangar East	none
Hangar	none

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>Landside Improvement-CONRAC</i>	<i>none</i>
<i>North Terminal Expansion</i>	<i>none</i>
<i>South Terminal Expansion</i>	<i>none</i>
<i>Landside Improvement- Switchgear</i>	<i>none</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?
None	N/A	N/A

Justifications:

[Identify the justification for each existing facility or facility construction project with disparate impacts that cannot be eliminated. This step is only required for the Facilities or Construction Projects with Disparate Impacts where the impact is not eliminated (those with “No” in the right column, above). Note: You are required to provide a justification for proceeding with construction or use, not to cease construction or use. Alternatives and additional minimization, mitigation, or enhancements that were considered and rejected should be explained.]

Facilities or Construction Projects	Justification
None	N/A

[Note: in analyzing the justification, consider: (1) To what extent does the program or activity expand opportunity; (2) If persons or businesses are to be displaced, relocated or adversely affected, whether the displacement will be equitably shared by the Affected Communities; (3) The historical background of the program or activity over time, including its design, construction and/or modification; (4) Any related preexisting disadvantages impacting the Affected Community, and any action taken by the recipient or others to alleviate these disadvantages; and (5) An analysis of the comparative impacts of alternative approaches.]

8. Limited English Proficiency (LEP)
Executive Order 13166

In creating a Language Assistance Plan, the SRAA 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
Spanish
Indic Languages
Chinese

The SRAA also collects data for languages spoken by airport guests.¹⁰ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Survey added to wifi access	www.flysyracuse.com www.syraairport.org

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

Language
N/A

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

¹⁰ 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.

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
Universal Translation Services	All above languages

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport website request form	All above languages
Airport website translate view	
Volunteer multi-lingual staff pool	

Interpretation Services:

The following vendors have been identified for interpretation services

Interpretation Vendors	Languages
Language Line, Inc.	All above languages
Liberty Translations & Interpreters, LLC	All Above Languages

- Information regarding interpretation services can be obtained at the SRAA website and airline check in counters.

Location for Interpretation Assistance	Languages
Airport Assistance page Language Tab	All above languages

Description of Interpretation Assistance Processes

- Title VI Coordinator will maintain a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated annually in the Public Information Handbook and provided to all airport employees. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.
- The airport will contract with the Language Line, Inc. or similar provider to provide on-

demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport Communications Center desk or Airport Volunteers use I-Speak cards to identify the language spoken by the airport guest. Staff contacts Language Line, Inc. and “parks” the request in the queue for the appropriate language. Language Line, Inc. operators will coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is then logged in the Language Line Service binder. This log is kept for one year.

9. Transportation

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

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

We have coordinated with local transit authority or authorities or planning entities 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
Onondaga County	Centro/ Call -a- Bus	Existing

10. Minority Businesses- AWAITING RESPONSE FROM RW OR JM

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
Concessions	NYS Contract Reporter / posts on AAAE & ACI websites
Construction Projects	Various State sponsored outreach events
All projects and opportunities	Posted to Airport website

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 SRAA.

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
- What is the complaint procedure, where can it be found
- 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 made available the SRAA Learning Management System and should be trained every 3 years.

12. Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations

FAA Notification. The Director of Human Resources and/or the Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements¹¹
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹²

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, the SRAA must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Director of Human Resources and/or 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 Director of Human Resources/ 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 matters¹³
3. Allege misconduct by the SRAA, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the SRAA including airport employees, contractors, concessionaires, lessees, or tenants.

¹¹ 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.

¹² 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.

¹³ 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.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the SRAA. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the Director of Human Resources, General Counsel and Executive Director.

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

Debi Marshall
Title VI Coordinator
Syracuse Regional Airport Authority
1000 Col Eileen Collins Blvd
Syracuse, NY 13212
CivilRights@syrairport.org

If a complaint is initially made by phone, it must be supplemented with a written complaint before 180 calendar 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, along with the Director of Human Resources, 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 or Director of Human Resources will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 15 calendar days.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 calendar 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 information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

Assignment of Investigator. The Director of Human Resources along with the Coordinator will immediately begin the investigation or designate an investigator.

Cooperation with FAA. The Director of Human Resources along with 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 the SRAA, the Director of Human Resources along with the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

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

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

Investigation Report. After completing the investigation, the Director of Human Resources along with the Coordinator will prepare a written report.

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

Prompt Resolution of Disputes. The Director of Human Resources along with the Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through mediation or other appropriate options.

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 the SRAA'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 SRAA Executive Director.
- The written appeal must be received within 15 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 Executive Director will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. The SRAA 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 Debi Marshall.

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

Website, In-person, and Other Distribution Methods

1 Airport website, Title VI page at <https://syraairport.org/assistance>

2 SRAA Administrative Office – Title VI Coordinator or Human Resources office

14. Population / Language Data[Insert the full B16001 and S1701 tables for your area from www.census.gov]

	Onondaga County, New York	
Label	Estimate	Margin of Error
Total:	441,326	±40
Speak only English	395,199	±1,223
Spanish or Spanish Creole:	13,741	±664
Speak English "very well"	9,461	±615
Speak English less than "very well"	4,280	±497
French (incl. Patois, Cajun):	2,107	±369
Speak English "very well"	1,707	±313
Speak English less than "very well"	400	±147
French Creole:	143	±93
Speak English "very well"	103	±75
Speak English less than "very well"	40	±41
Italian:	2,867	±377
Speak English "very well"	2,098	±335
Speak English less than "very well"	769	±161
Portuguese or Portuguese Creole:	250	±119
Speak English "very well"	186	±98
Speak English less than "very well"	64	±40
German:	982	±218
Speak English "very well"	792	±168
Speak English less than "very well"	190	±95
Yiddish:	149	±118
Speak English "very well"	148	±118
Speak English less than "very well"	1	±2
Other West Germanic languages:	57	±33
Speak English "very well"	57	±33

Speak English less than "very well"	0	±27
Scandinavian languages:	68	±40
Speak English "very well"	60	±35
Speak English less than "very well"	8	±12
Greek:	514	±185
Speak English "very well"	382	±165
Speak English less than "very well"	132	±72
Russian:	1,377	±294
Speak English "very well"	758	±223
Speak English less than "very well"	619	±138
Polish:	984	±224
Speak English "very well"	676	±178
Speak English less than "very well"	308	±102
Serbo-Croatian:	1,256	±368
Speak English "very well"	625	±207
Speak English less than "very well"	631	±212
Other Slavic languages:	2,013	±436
Speak English "very well"	1,181	±287
Speak English less than "very well"	832	±208
Armenian:	46	±30
Speak English "very well"	14	±18
Speak English less than "very well"	32	±24
Persian:	178	±135
Speak English "very well"	108	±83
Speak English less than "very well"	70	±63
Gujarati:	102	±67
Speak English "very well"	62	±56
Speak English less than "very well"	40	±35
Hindi:	942	±300
Speak English "very well"	671	±229
Speak English less than "very well"	271	±162

Urdu:	501	±273
Speak English "very well"	289	±127
Speak English less than "very well"	212	±182
Other Indic languages:	2,065	±414
Speak English "very well"	844	±255
Speak English less than "very well"	1,221	±327
Other Indo-European languages:	604	±222
Speak English "very well"	444	±171
Speak English less than "very well"	160	±98
Chinese:	3,890	±539
Speak English "very well"	1,932	±467
Speak English less than "very well"	1,958	±311
Japanese:	232	±96
Speak English "very well"	131	±67
Speak English less than "very well"	101	±72
Korean:	1,114	±255
Speak English "very well"	689	±178
Speak English less than "very well"	425	±129
Mon-Khmer, Cambodian:	173	±96
Speak English "very well"	67	±46
Speak English less than "very well"	106	±68
Hmong:	92	±104
Speak English "very well"	80	±92
Speak English less than "very well"	12	±17
Thai:	348	±159
Speak English "very well"	195	±117
Speak English less than "very well"	153	±96
Laotian:	149	±80
Speak English "very well"	62	±42
Speak English less than "very well"	87	±67
Vietnamese:	1,650	±393

Speak English "very well"	654	±201
Speak English less than "very well"	996	±266
Other Asian languages:	2,058	±525
Speak English "very well"	974	±323
Speak English less than "very well"	1,084	±374
Tagalog:	400	±180
Speak English "very well"	343	±156
Speak English less than "very well"	57	±41
Other Pacific Island languages:	74	±53
Speak English "very well"	26	±29
Speak English less than "very well"	48	±35
Navajo:	35	±52
Speak English "very well"	35	±52
Speak English less than "very well"	0	±27
Other Native North American languages:	160	±90
Speak English "very well"	154	±88
Speak English less than "very well"	6	±9
Hungarian:	85	±57
Speak English "very well"	54	±42
Speak English less than "very well"	31	±29
Arabic:	2,488	±495
Speak English "very well"	1,671	±372
Speak English less than "very well"	817	±228
Hebrew:	141	±72
Speak English "very well"	101	±60
Speak English less than "very well"	40	±37
African languages:	2,027	±417
Speak English "very well"	1,163	±279
Speak English less than "very well"	864	±279
Other and unspecified languages:	65	±61

Speak English "very well"	65	±61
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Oneida County, New York		
Label	Estimate	Margin of Error
Total:	220,162	±59
Speak only English	193,875	±1,185
Spanish or Spanish Creole:	7,580	±490
Speak English "very well"	5,242	±415
Speak English less than "very well"	2,338	±294
French (incl. Patois, Cajun):	685	±183
Speak English "very well"	516	±164
Speak English less than "very well"	169	±65
French Creole:	128	±122
Speak English "very well"	100	±110
Speak English less than "very well"	28	±22
Italian:	1,256	±265
Speak English "very well"	979	±216
Speak English less than "very well"	277	±105
Portuguese or Portuguese Creole:	133	±148
Speak English "very well"	133	±148
Speak English less than "very well"	0	±27
German:	751	±251
Speak English "very well"	640	±211
Speak English less than "very well"	111	±64
Yiddish:	23	±22
Speak English "very well"	20	±22
Speak English less than "very well"	3	±5
Other West Germanic languages:	89	±106
Speak English "very well"	76	±99
Speak English less than "very well"	13	±13

Scandinavian languages:	6	±7
Speak English "very well"	0	±27
Speak English less than "very well"	6	±7
Greek:	146	±99
Speak English "very well"	125	±86
Speak English less than "very well"	21	±21
Russian:	1,702	±593
Speak English "very well"	720	±287
Speak English less than "very well"	982	±357
Polish:	1,209	±260
Speak English "very well"	904	±214
Speak English less than "very well"	305	±127
Serbo-Croatian:	3,487	±502
Speak English "very well"	1,743	±294
Speak English less than "very well"	1,744	±276
Other Slavic languages:	534	±176
Speak English "very well"	174	±76
Speak English less than "very well"	360	±138
Armenian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Persian:	140	±103
Speak English "very well"	94	±70
Speak English less than "very well"	46	±38
Gujarati:	45	±42
Speak English "very well"	33	±31
Speak English less than "very well"	12	±17
Hindi:	100	±70
Speak English "very well"	89	±73
Speak English less than "very well"	11	±18
Urdu:	386	±323
Speak English "very well"	189	±179

Speak English less than "very well"	197	±241
Other Indic languages:	649	±347
Speak English "very well"	410	±214
Speak English less than "very well"	239	±176
Other Indo-European languages:	146	±78
Speak English "very well"	79	±40
Speak English less than "very well"	67	±53
Chinese:	479	±153
Speak English "very well"	290	±113
Speak English less than "very well"	189	±108
Japanese:	57	±47
Speak English "very well"	0	±27
Speak English less than "very well"	57	±47
Korean:	158	±72
Speak English "very well"	90	±56
Speak English less than "very well"	68	±42
Mon-Khmer, Cambodian:	684	±342
Speak English "very well"	348	±215
Speak English less than "very well"	336	±207
Hmong:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Thai:	119	±75
Speak English "very well"	26	±25
Speak English less than "very well"	93	±69
Laotian:	15	±23
Speak English "very well"	0	±27
Speak English less than "very well"	15	±23
Vietnamese:	937	±302
Speak English "very well"	472	±204

Speak English less than "very well"	465	±175
Other Asian languages:	2,930	±604
Speak English "very well"	292	±129
Speak English less than "very well"	2,638	±601
Tagalog:	68	±41
Speak English "very well"	56	±40
Speak English less than "very well"	12	±16
Other Pacific Island languages:	124	±104
Speak English "very well"	116	±104
Speak English less than "very well"	8	±10
Navajo:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Other Native North American languages:	66	±62
Speak English "very well"	20	±22
Speak English less than "very well"	46	±42
Hungarian:	43	±33
Speak English "very well"	29	±25
Speak English less than "very well"	14	±22
Arabic:	973	±324
Speak English "very well"	526	±214
Speak English less than "very well"	447	±231
Hebrew:	138	±126
Speak English "very well"	136	±125
Speak English less than "very well"	2	±5
African languages:	288	±143
Speak English "very well"	167	±102
Speak English less than "very well"	121	±79
Other and unspecified languages:	13	±14
Speak English "very well"	4	±5

Speak English less than "very well"	9	±13
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	Broome County, New York	
Label	Estimate	Margin of Error
Total:	187,978	±59
Speak only English	170,361	±918
Spanish or Spanish Creole:	4,304	±443
Speak English "very well"	3,077	±345
Speak English less than "very well"	1,227	±217
French (incl. Patois, Cajun):	678	±222
Speak English "very well"	552	±211
Speak English less than "very well"	126	±62
French Creole:	219	±125
Speak English "very well"	103	±64
Speak English less than "very well"	116	±86
Italian:	1,060	±217
Speak English "very well"	714	±159
Speak English less than "very well"	346	±127
Portuguese or Portuguese Creole:	151	±116
Speak English "very well"	124	±110
Speak English less than "very well"	27	±28
German:	309	±103
Speak English "very well"	267	±100
Speak English less than "very well"	42	±35
Yiddish:	169	±228
Speak English "very well"	112	±146
Speak English less than "very well"	57	±84
Other West Germanic languages:	44	±27
Speak English "very well"	44	±27

Speak English less than "very well"	0	±27
Scandinavian languages:	24	±34
Speak English "very well"	24	±34
Speak English less than "very well"	0	±27
Greek:	239	±120
Speak English "very well"	144	±89
Speak English less than "very well"	95	±76
Russian:	818	±340
Speak English "very well"	385	±204
Speak English less than "very well"	433	±186
Polish:	254	±106
Speak English "very well"	238	±104
Speak English less than "very well"	16	±20
Serbo-Croatian:	467	±187
Speak English "very well"	269	±132
Speak English less than "very well"	198	±109
Other Slavic languages:	571	±189
Speak English "very well"	435	±170
Speak English less than "very well"	136	±76
Armenian:	115	±102
Speak English "very well"	98	±92
Speak English less than "very well"	17	±28
Persian:	169	±157
Speak English "very well"	93	±88
Speak English less than "very well"	76	±73
Gujarati:	274	±142
Speak English "very well"	224	±127
Speak English less than "very well"	50	±47
Hindi:	521	±417
Speak English "very well"	476	±388
Speak English less than "very well"	45	±56

Urdu:	442	±208
Speak English "very well"	280	±151
Speak English less than "very well"	162	±101
Other Indic languages:	606	±221
Speak English "very well"	522	±191
Speak English less than "very well"	84	±74
Other Indo-European languages:	823	±486
Speak English "very well"	602	±361
Speak English less than "very well"	221	±152
Chinese:	2,216	±395
Speak English "very well"	1,233	±247
Speak English less than "very well"	983	±299
Japanese:	93	±69
Speak English "very well"	82	±69
Speak English less than "very well"	11	±17
Korean:	524	±107
Speak English "very well"	223	±100
Speak English less than "very well"	301	±96
Mon-Khmer, Cambodian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Hmong:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Thai:	32	±32
Speak English "very well"	32	±32
Speak English less than "very well"	0	±27
Laotian:	483	±152
Speak English "very well"	151	±72
Speak English less than "very well"	332	±114
Vietnamese:	422	±198

Speak English "very well"	207	±124
Speak English less than "very well"	215	±120
Other Asian languages:	447	±196
Speak English "very well"	329	±154
Speak English less than "very well"	118	±93
Tagalog:	286	±118
Speak English "very well"	236	±105
Speak English less than "very well"	50	±36
Other Pacific Island languages:	6	±13
Speak English "very well"	6	±13
Speak English less than "very well"	0	±27
Navajo:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Other Native North American languages:	12	±14
Speak English "very well"	6	±11
Speak English less than "very well"	6	±9
Hungarian:	2	±3
Speak English "very well"	2	±3
Speak English less than "very well"	0	±27
Arabic:	533	±269
Speak English "very well"	305	±216
Speak English less than "very well"	228	±129
Hebrew:	139	±76
Speak English "very well"	94	±58
Speak English less than "very well"	45	±40
African languages:	146	±80
Speak English "very well"	126	±74
Speak English less than "very well"	20	±20
Other and unspecified languages:	19	±18

Speak English "very well"	9	± 9
Speak English less than "very well"	10	± 16

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.

ADA Coordinator: Debi Marshall
ADA Coordinator Phone: 315-455-3636
Title VI Coordinator Phone: 315-455-3646
Email: CivilRights@syrairport.org
Address: 1000 Col. Eileen Collins Blvd.
Syracuse, NY 13212

Discriminación Ilegal

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

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

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

ADA Coordinador: Debi Marshall
ADA Coordinador Teléfono: 315-455-3636
Title VI Coordinador Teléfono: 315-455-3646
Email: CivilRights@syrairport.org
Dirección: 1000 Col. Eileen Collins Blvd.
Syracuse, NY 13212



U.S. Department of Transportation
Federal Aviation Administration

HQ-101088