

Missoula MT Airport Title VI Plan

1. Title VI Policy Statement¹

Missoula County Airport Authority (“MCAA”) 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.

MCAA 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 **MCAA** will take action to involve them and the general public in the decision making process.

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

Juniper Davis, available at **406.728.4381** and **jdavis@flymissoula.com**, 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
Brian Ellestad
Airport Director

January 1, 2024

Effective Date

December 31, 2026

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

MCAA Board of Commissioners has reviewed and adopted this Title VI Plan for **MCAA**. 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 ***Airport Director***'s or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the **MCAA Board of Commissioners** 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:

None.

MCAA has the following airport program sub-recipients:

None.

As of the date of this plan, **MCAA** has the following pending applications for Federal financial assistance: **None**

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/airports/aip/</i>
<i>Bipartisan Infrastructure Law (BIL)</i>	<i>https://www.faa.gov/general/bipartisan-infrastructure-law-airport-infrastructure-grant-funding-amounts</i>

3. Grant and Procurement Assurances

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

MCAA 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. **MCAA** requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

Description of Oversight Methods for Subcontracts

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

4. Title VI Coordinator Responsibilities

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

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

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

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to **MCAA** 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 MCAA's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).

- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

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

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

5. Notice

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

MCAA 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/acr/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 15 Appendix.

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

MCAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by **February 1, 2024**, by email and at tenants meeting.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
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² For more information about website accessibility, please visit ADA.gov.

<i>Terminal</i>	<i>2</i>	<i>2</i>	
<i>Rent-a-Car Building</i>	<i>1</i>		
<i>Neptune Aviation (FBO)</i>			<i>1</i>
<i>Minuteman Aviation (FBO)</i>			<i>1</i>

Outreach to Affected Communities

MCAA Administration 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 **MCAA’s website**. **MCAA Administration** 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.

To ensure that the community is effectively informed of and able to participate in public hearings, **MCAA Administration** 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, **MCAA** will be able to identify, understand, and engage with communities. In doing so, **MCAA** needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by **MCAA’s** airport program.

Affected Communities⁴	Population
<i>City of Missoula</i>	<i>73,000</i>
<i>Missoula County</i>	<i>118,465</i>

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

We have identified the following facts about the Affected Communities:

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.

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.

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,” MCAA is collecting information about affected and potentially affected low-income communities. According to the *U.S. Census Report, S1701: Poverty Status in the Past 12 Months*, the overall poverty level for **Missoula County** is approximately **7.9%**. The poverty rate remains **low** compared with the rest of the **state and country**. The poverty rates for the specific Affected Communities are as follows [*list, if Census or local data is available*].

Affected Communities	Poverty Rate
<i>City of Missoula</i>	<i>9.2%</i>
<i>Missoula County</i>	<i>7.9%</i>

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 follows⁶:

Affected Community: <u><i>City of Missoula</i></u>		
Total Affected Community Population: <u><i>72,192</i></u>		
Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	<i>63,496</i>	<i>88%</i>
<i>Black or African American</i>	<i>498</i>	<i>.7%</i>
<i>American Indian or Alaska Native</i>	<i>1,493</i>	<i>2%</i>
<i>Asian</i>	<i>1,159</i>	<i>1.6%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>83</i>	<i>.1%</i>
<i>Hispanic or Latino</i>	<i>3,201</i>	<i>4.4%</i>
<i>More than one</i>	<i>4,609</i>	<i>6.4%</i>

Data from U.S. Census Table S1701, ACS 5-Year

Affected Community: <u><i>Missoula County</i></u>		
Total Affected Community Population: <u><i>115,895</i></u>		
Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community

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.

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

		Population
<i>White</i>	<i>103,362</i>	<i>89%</i>
<i>Black or African American</i>	<i>708</i>	<i>.6%</i>
<i>American Indian or Alaska Native</i>	<i>2,303</i>	<i>1%</i>
<i>Asian</i>	<i>2,086</i>	<i>1.8%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>107</i>	<i>.09%</i>
<i>Hispanic or Latino</i>	<i>4,173</i>	<i>3.6%</i>
<i>More than one</i>	<i>6,190</i>	<i>5.3%</i>

Data from U.S. Census Table S1701, ACS 5-Year

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **MCAA** 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 **U.S. Census Bureau, Table B16001**.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁸ The safe harbor for our community is **1000**. Please refer to the end of this document to find data for all languages in our community.

There are no LEP Populations in the City of Missoula or Missoula County that meet the safe harbor threshold.

There is infrequent contact with LEP individuals at the airport and airport-related activities. A survey of employees from different sectors of the airport revealed that airline ticket agents have contact with LEP individuals at a rate of less than one per year.

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>	X			
<i>French</i>	X			
<i>Italian</i>				
<i>Portuguese or Portuguese Creole</i>				
<i>German</i>				
<i>Yiddish</i>				
<i>Scandinavian</i>				

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.

<i>Greek</i>				
<i>Russian</i>	X			
<i>Polish</i>				

If available and distinct from the LEP data above: Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include: NONE

This information is updated annually⁹ through checking the following resources:

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

Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures. During in-person meetings, forms are provided for attendees to complete. During virtual meetings, forms are emailed to attendees. Written forms do not include personal information and are shredded after the data is entered into an excel file.

Description of Beneficiary Demographic Information Collection Methods

- *Airport Administration conducts surveys of airport guests signing on to airport wi-fi 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.*
- *Written forms do not include personal information and are shredded after the data is entered into an excel file.*

Staff and Advisory Board Diversity.

Demographic information is collected from airport program employees 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*

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.

application through the job application website.

- Airport Board members are asked to submit voluntary confidential demographic information at time of appointment to the Board.

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 MCAA 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>Terminal – Phase 1 and 2</i>	<i>None</i>
<i>ATCT</i>	<i>None</i>
<i>Snow Removal Equipment (SRE) building</i>	<i>None</i>
<i>Rental Car Temporary Facility</i>	<i>None</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>Air Carrier East Ramp Extension</i>	<i>None</i>
<i>SRE Garage Modifications</i>	<i>None</i>
<i>Rehabilitate Aviation Way</i>	<i>None</i>
<i>Runway 12-30 Rehabilitation</i>	<i>None</i>
<i>Reconstruction Taxiway G</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: None.

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.

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the MCAA 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:

There are no LEP Populations in the City of Missoula or Missoula County that meet the safe harbor threshold.

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

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Airport language line usage data</i>	<i>www.languageline.com</i>
<i>Airline-provided data</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: **None**.

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 MCAA 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.
- Information regarding translation services can be obtained from MCAA Administration office at 406.728.4381.

Interpretation Services:

- The following vendors have been identified for interpretation services:
www.languageline.com

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.

- Information regarding interpretation services can be obtained at: ***MSO Administration office.***

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.

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
City of Missoula	Fixed-route buses	Existing
City of Missoula	Paratransit vans	Existing

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>Terminal Concessions</i>	<i>Published Request for Proposal or Invitation to Bid documents sent to businesses on state DBE list.</i>
<i>Parking Lot Operations Contract</i>	<i>Published Request for Proposal documents sent to businesses on state DBE list.</i>
<i>Janitorial Contract</i>	<i>Published Request for Proposal documents sent to businesses on state DBE list.</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 **MCAA Administration.**

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 *to all employees* through MSO's HR software, under the trainings tab. Employees will receive notice annually to review the refresher information.

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, **MCAA** must notify FAA contacts of any new investigations prior to grant execution.

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

13. Title VI Complaints

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

Scope. These procedures are for complaints of discrimination under Title VI and related laws

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 employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights 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 the **MCAA**, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the **MCAA** including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the **MCAA**.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 Coordinator will log in the complaint and promptly send copies of the complaint to the office named in the complaint and the Airport Director.

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

Title VI Coordinator

Juniper Davis

MCAA

5225 Highway 10 West

Missoula, MT 59808

(406) 728-4381

jdavis@flymissoula.com

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

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

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 Coordinator within **7 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 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 *be uploaded to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff*. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

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

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

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

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

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

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through informal mediation, negotiation and/or formal mediation.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state **MCAA'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 **upload to 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 **MCAA Airport Director**.
- The written appeal must be received **within ten** 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 **MCAA Airport 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, MCAA will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **MCAA** 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, Juniper Davis, at jdavis@flymissoula.com or (406) 728-4381.

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

Website, In-person, and Other Distribution Methods

1 *Airport website at <https://flymissoula.com/reports-and-statistics>.*

2 MCAA Administration office, Missoula Montana Airport Terminal, Third Floor.

14. Population / Language Data

See Attachments:

- American Community Survey, Table S1701, Missoula County
- American Community Survey, Table S1701, City of Missoula
- American Community Survey, Table B16001, Missoula County
- American Community Survey, Table B16001, City of Missoula

15. Completed Unlawful Discrimination Poster

See Attachment 5.