

LEXINGTON-FAYETTE URBAN COUNTY AIRPORT BOARD

TITLE VI PLAN

I. PURPOSE

As a recipient of federal grant money, Blue Grass Airport is regulated by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and Section 520 of the Airport and Airway Improvement Act of 1982. These Acts prohibit discrimination on the basis of race, color, national origin, sex, age (over 40), religion, gender identity, veteran status or disability and mandate that no person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any programs and activities receiving federal financial assistance.

Blue Grass Airport further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether they are federally funded or not. This includes, but is not limited to, the following:

- Denial to an individual of any service or benefit provided under a program
- Distinctions in quality, quantity or manner in which the benefit is provided
- Disparate impact or separate treatment in any program providing services to individuals
- Different standards or requirements for benefits or participation in services provided
- Discrimination in any activities/programs conducted in a facility built in whole or in part with federal financial assistance
- Methods of administration which directly or through contractual relationships would defeat or substantially impair the accomplishment of effective discrimination

This plan will serve as a guide to the Lexington-Fayette Urban County Airport Board in its administration of all Title VI activities. Community engagement on all levels is encouraged and our policies and procedures are created to be as clear and transparent as possible.

II. DEPARTMENT OF TRANSPORTATION'S FOUR-FACTOR ANALYSIS

A. FACTOR ONE (Proportion of Limited English Proficient persons)

Limited English Proficient persons are those who do not speak English as their primary language and have a limited ability to read, write, speak or understand English as a result of their national origin. Based on 2010 data from the U.S. Census Bureau, the main Limited English Proficient population in the Commonwealth of Kentucky is of Hispanic origin, with Asian as a distant second.

The potential Limited English Proficient population is approximately 11% of the overall population for Fayette County and 4.6% of the overall population in the Commonwealth of Kentucky.

B. FACTOR TWO (Frequency of contact with Limited English Proficient persons)

Airport staff and concessionaires report minimal requests for language translation services and assistance from customers utilizing airport services.

Public meetings are held in areas accessible to Limited English Proficient populations.

C. FACTOR THREE (Nature/importance of services provided to Limited English Proficiency population)

Department of Transportation guidance states “transportation is considered an essential service to participation in modern society.” As access to air service is deemed essential, Blue Grass Airport works closely with community partners and provides resources to ensure access to its services, programs and activities.

D. FACTOR FOUR (Resources available to provide language assistance)

Blue Grass Airport’s Operating and Capital Improvement budget provides for employee training, signage and other methods used to provide information and services to the Limited English Proficient population. See Section III, Item C for a listing of these resources.

III. PUBLIC AWARENESS

A. BIDS/CONTRACTS

Bids and contracts will be awarded without discrimination on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status or disability.

Title VI assurances are required from all tenants, contractors and concessionaires operating at Blue Grass Airport. Any subcontractors utilized by tenants, contractors and concessionaires are also subject to these Title VI assurances.

Bids for airport contracts are solicited through the following methods: local newspapers, community outreach and airport trade publications. Blue Grass Airport also makes efforts to engage leaders and representatives of demographic groups that are underrepresented to encourage participation in projects.

B. COMMUNITY OUTREACH

U.S. Department of Transportation/Federal Aviation Administration Unlawful Discrimination signage is posted in the terminal and on Blue Grass Airport's website to ensure the general public is informed that discrimination is prohibited.

Blue Grass Airport's monthly Board meetings are open to the public and the annual schedule is posted for public viewing on our website.

Public workshops/meetings are held when proposed airport activities will have a significant impact on surrounding neighborhoods. These meetings are advertised in local newspapers as well as on Blue Grass Airport's website. Written advertisements for public workshops include a reference encouraging attendees to contact the airport in advance if there are special communication or accommodation needs.

A copy of this Title VI Plan is available on the airport's website at www.bluegrassairport.com and at the Information Center.

C. LIMITED ENGLISH PROFICIENCY SERVICES

Multiple resources pertaining to Limited English Proficiency are made available through airport staff. This includes the airport's Guest Services Department (Information Center, Administration Receptionist and Club at Blue Grass executive lounge), Operations Department, Public Safety Department and Administrative staff. These resources include:

- **Language Identification Flashcards:** More than 35 languages are included on these "I Speak" cards so that staff can determine the primary language of a Limited English Proficient customer.
- **Interpretation Services (In Person):** A list of multilingual staff for the airport and its airlines, concessionaires and tenants is compiled and kept at all Guest Service locations. Individuals on this list can assist with translation in person when their services are needed.
- **Interpretation Services (Telephone Service):** Blue Grass Airport has a language assistance phone partner that provides over-the-phone interpreting via three-way communication (staff, customer and interpreter). Interpreters are professionally tested and trained, and the service is available to the airport 24 hours a day, 7 days a week, 365 days a year.
- **Translation Services (Written Text):** In the event the airport needs to respond to a complaint from Limited English Proficient persons, the

airport's language assistance provider can also translate written documents.

- **Universal Pictogram Signage:** Much of the signage in Blue Grass Airport's terminal includes universal symbols and pictograms to assist Limited English Proficient persons.

IV. DISCRIMINATION COMPLAINT PROCEDURE

Any person who feels they have been subjected to discrimination on the basis of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status or disability has a right to file a complaint with the airport or directly to the Federal Aviation Administration (FAA).

Complaints must be filed in writing and delivered to the Title VI Coordinator within 180 days after the alleged discriminatory event. Complaints should include the following information:

- An explanation of what happened
- Complainant's contact information
- Identification of the respondent
- Sufficient information regarding the allegation(s)
- Date(s) of the alleged acts(s)
- Signature of the complainant or the complainant's representative

Accommodation will be provided upon request for those individuals who are unable to file a written complaint due to a disability or language barrier. Complaints should be sent to the airport at the following address:

Blue Grass Airport
Attention: Title VI Coordinator
4000 Terminal Drive, Suite 206
Lexington, KY 40510

The complainant may also file a complaint directly to the FAA. In that situation, written complaints should be mailed to:

Federal Aviation Administration
Office of Civil Rights
800 Independence Avenue S.W.
Washington, DC 20591

Upon receipt of complaints to the airport, the Title VI Coordinator will investigate the complaint and send a copy of the complaint, along with any findings and resolution

attempts, to the FAA within 15 days of receipt. A copy of the formal complaint will be maintained on file for six months from the date of receipt.

The Lexington-Fayette Urban County Airport Board will promptly investigate and act expeditiously to resolve issues with complainants. A representative of the Airport may meet with the complainant to obtain additional information or determine if an informal resolution might be possible.

After completion of the complaint investigation, the Title VI Coordinator will prepare a written report and coordinate with airport legal counsel to provide a formal response to the complainant. Copies of these reports/responses will be sent to the Federal Aviation Administration.

V. STAFF TRAINING

- Staff interacting with the public, concessionaires, construction partners and other stakeholders receive training regarding Title VI provisions.
- Title VI training materials are included in all Guest Services training manuals and are shared with Operations and Public Safety since these teams frequently interact with the public, especially in emergency situations.
- All new employees receive a copy of our Title VI Form (see attached).

VI. TITLE VI COORDINATORS

Title VI Coordinators for Blue Grass Airport are as follows:

- Tiffany Carter: General Administration
4000 Terminal Drive, Suite 206
Lexington, KY 40510
859-425-3106
tcarter@bluegrassairport.com
- Lynn Hoard-Wilson: Engineering
4000 Terminal Drive, Suite 206
Lexington, KY 40510
859-425-3107
lhoard@bluegrassairport.com

Title VI Coordinator responsibilities include:

- Reviewing and updating the airport's Title VI Plan as needed
- Providing guidance and advice on the Title VI Plan and coordinating dissemination of Title VI information to the public (signage, website, public meetings)
- Coordinating Title VI training for staff

- Receiving, recording and forwarding any Title VI complaints to the Federal Aviation Administration within 15 days of receipt, along with an explanation of the resolution attempts regarding the complaint
- Responding to Federal Aviation Administration requests for data and records to determine Title VI compliance

VII. FORMS

- Employee Policy Form
- Sample Complaint Form