

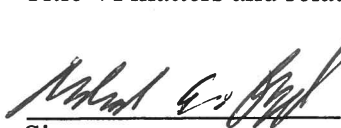
1. Title VI Policy Statement¹

St. Joseph County Airport Authority 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.

St. Joseph County Airport Authority 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 St. Joseph County Airport Authority will take action to involve them and the general public in the decision-making process.

St. Joseph County Airport Authority 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 St. Joseph County Airport Authority and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Kerianne Linn, A.A.E., available at 574-800-3221 and klinn@sbnair.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

Michael Daigle, A.A.E.
CEO/Executive Director

April 1, 2024

Effective Date

April 1, 2027

3-Year Expiration Date

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

2. Administration

The St. Joseph County Airport Authority Board has reviewed and adopted this Title VI Plan for St. Joseph County Airport Authority. 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 Executive Director/CEO’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the St. Joseph County Airport Authority Board and resubmittal to FAA.

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

Staff Supporting Title VI Program	Airport Sponsor Program / Office
NONE	

St. Joseph County Airport Authority has the following airport program sub-recipients:

Sub-Recipients
None

As of the date of this plan, St. Joseph County Airport Authority has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
FAA AIP	3-18-0079-064	1,815,666
FAA AIP	3-18-0079-065	1,006,453
FAA AIP	3-18-0079-066	132,806
FAA AIP	3-18-0079-067	3,409,031
FAA AIP	3-18-0079-068	19,629,036

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

Federal Source	Grant Award Information Available at:
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)

St. Joseph County Airport Authority 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. St. Joseph County Airport Authority 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

Random subcontracts are audited by the Project Manager to verify they include the correct 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 St. Joseph County Airport Authority leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership.

- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, 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)

St. Joseph County Airport Authority 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.

St. Joseph County Airport Authority has posted the above Title VI policy statement at its staff offices.

St. Joseph County Airport Authority will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by June 1, 2024 by email, tenant meetings, pre-construction meetings and employee meetings.

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

		Area	
Terminal-Information Office	1		
Concourse -TSA Checkpoint		1	
Administration Offices			1
Maintenance Building			1
Safety Building			1

Outreach to Affected Communities

The Title VI Coordinator 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, and email broadcast. The Title VI Coordinator 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.

St. Joseph County Airport Authority will create a detailed CPP by December 31, 2024. A copy of the plan will be available at www.flysbn.com

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

6. Community Statistics

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

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.

Affected Communities ⁴	Population
Keller Park	
Blackthorn	
Ardmore	
Collectively the 3 neighborhoods make up the 46628 zip code which is the information used	28,402

(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,” St. Joseph County Airport Authority is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, S1701: Poverty Status in the Past 12 Months], the overall poverty level for the zip code is approximately 20.6 %. The poverty rate remains high compared with the rest of the St. Joseph County, Indiana.

Affected Communities	Poverty Rate
Zip Code 46628	20.6

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: 46628
Total Affected Community Population: 28042

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	16,391	58%
Black or African American	7,618	27%

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.

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

American Indian or Alaska Native	31	0%
Asian	357	1%
Native Hawaiian or Other Pacific Islander	7	0%
Hispanic or Latino	2213	8%
More than one	1425	5%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that St. Joseph County Airport Authority 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 the Census American Community Survey.

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 1,000. Please refer to the end of this document to find data for all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	1505	+/-381

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		

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

Additional Languages Spoken

French
Italian
Portuguese
German
Other West Germanic Languages
Russian
Polish

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.

Armenian
 Gujarati
 Hindi
 Chinese
 Japanese
 Other Asian Languages
 Tagalong
 Other Native North American Languages
 Hungarian
 Arabic
 African Languages

This information is updated annually⁹ 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

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
<ul style="list-style-type: none"> • 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.

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.

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 St. Joseph County Airport Authority 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
Terminal- 4477 Progress Dr.	None
Maintenance Facility 4712 Lathrop	None
Fuel Farm 3950 Progress	Keller Park
Safety 4821 Lincolnway West	None
Fire Training Facility 6060 Lathrop St.	None
Honor Park Museum 4300 Progress Dr.	None
Terminal Maintenance Building 4823 Lathrop	None
East Hangar 4101 Progress	None
Car Wash Facility 4135 Progress	None
Fed Express 5301 Lincolnway West	Ardmore
Hangar 301 4483 Corporate Dr	None
Hangar 302 55878 Corporate Dr.	None
Hangar 305 4585 Corporate Dr.	None
Hangar 306 4591 Corporate Dr.	None
1 st Source Hangar 4595 Corporate Dr.	None
Leco Hangar 4100 Lathrop	None
UPS 3800 Lathrop	Blackthorn
Atlantic Aviation 4302 Lathrop	None
Post and King Hangar 4343 Progress Dr.	None
LASH 4211 Progress Dr.	None
Studebaker Hangar 4819 Lincolnway West	None
T Hangars 4657 Lathrop St.	None
Corporate Wings 4200 Lathrop	None
ATC 4713 Lathrop	None

The following airport facility projects (including all alternatives) are in construction or expected

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.

to be in construction within the next 3 years:

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
Gates 4 & 8 remodel	None
Taxiway B Reconstruction	None
Quick Turn Around Facility	Ardmore

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?
Fuel Farm	Keller Park	No
UPS	Blackthorn	No
Federal Express	Ardmore	No
Quick Turn Around	Ardmore	No

Justifications:

Facilities or Construction Projects	Justification
Fuel Farm	Trucks need to deliver fuel and go through neighborhood
UPS	Delivery Trucks
Fed Ex	Delivery Trucks
QTA	Construction Equipment Short term

8. Limited English Proficiency (LEP) Executive Order 13166

In creating a Language Assistance Plan, the St. Joseph County Airport Authority 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
Italian
Portuguese
German
West Germanic Languages
Russian

Polish
Armenian
Gujarati
Hindi
Chinese
Japanese
Other Asian Languages
Tagalong
Other Native North American Languages
Hungarian
Arabic
African Languages

St. Joseph County Airport Authority 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
Assistance requests to airport information desk	N/A

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

Language
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 St. Joseph County Airport Authority of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

Translation Services:

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

Translation Vendors	Languages
None	

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 translation services can be obtained at:

Location for Translation Assistance	Languages
Information Desk	All above languages

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
None	

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport information desks	All above languages

Description of Interpretation Assistance Processes

- Airport Customer Service Office maintains a list of multilingual employees, the languages they speak, and their associated telephone numbers. The list is updated annually. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation. Employee volunteers agree to be contacted as needed.
- When a request for an interpreter is received, the following process is used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Airport information uses a Smart Translation Machine which is a handheld translator. The interaction is logged into the daily log. This log is kept for at least 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 South Bend Public Transportation Corporation d/b/a Transpo 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
Keller Park	Fixed-route buses	Existing
Ardmore	Fixed-route buses	Existing
Blackthorn	Fixed-route buses	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
Rental Car RFP	Emailed to all available ACDBE's through INDOT, Advertised in Local Paper, Airport Website
Airport Space for Lease	Emailed to all available ACDBE's through INDOT, Advertised in Local Paper, Airport Website
ATM RFP	Emailed to all available ACDBE's through INDOT, Advertised in Local Paper, 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 Manager of the Office handling the business opportunity.

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 training will be provided annually.

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

FAA Notification. The Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, St. Joseph County Airport Authority must notify FAA contacts of any new investigations prior to grant execution.

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

13. Title VI Complaints

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

Scope. These procedures are for complaints of discrimination under Title VI and related laws (hereafter “Title VI Complaints.” In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters¹⁴
3. Allege misconduct by the St. Joseph County Airport Authority, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the St. Joseph County Airport Authority 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

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.

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.

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 St. Joseph County Airport Authority.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 CEO/Executive Director.

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

Kerianne Linn, A.A.E.
4477 Progress Drive, South Bend IN 46628
574-800-3221
klinn@sbnair.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 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 48 hours.

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 upload to the FAA Civil Rights Connect System. 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

¹⁵

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 St. Joseph County Airport Authority, 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 mediation whenever possible, and if needed escalating to dispute resolution by the coordinator acting as arbiter if needed.

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 St. Joseph County Airport Authority'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 CEO/Executive Director.
- The written appeal must be received within 10 business days after receipt of the written decision.
- The written appeal must contain all arguments, evidence, and documents supporting the

basis for the appeal.

- The CEO/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 St., Joseph County Airport Authority will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. St. Joseph County Airport Authority 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 Kerianne Linn, A.A.E.

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 www.flysbn.com

14. Population / Language Data

ZCTA5 46628						
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
200 percent of poverty level	11,099	±1,323	(X)	(X)	(X)	(X)
300 percent of poverty level	16,475	±1,558	(X)	(X)	(X)	(X)
400 percent of poverty level	19,448	±1,536	(X)	(X)	(X)	(X)
500 percent of poverty level	22,276	±1,350	(X)	(X)	(X)	(X)
INRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	5,636	±705	1,713	±344	30.4%	±4.9
Male	2,591	±440	462	±148	17.8%	±5.8
Female	3,045	±470	1,251	±299	41.1%	±6.4
15 years	0	±24	0	±24	-	**
16 to 17 years	4	±11	4	±11	100.0%	±100.0
18 to 24 years	526	±203	295	±170	56.1%	±22.2
25 to 34 years	918	±293	216	±112	23.5%	±12.1
35 to 44 years	574	±191	234	±104	40.8%	±15.9
45 to 54 years	1,113	±343	269	±113	24.2%	±10.4
55 to 64 years	934	±263	381	±204	40.8%	±14.8
65 to 74 years	760	±234	160	±117	21.1%	±11.9
75 years and over	807	±211	154	±67	19.1%	±8.9
Mean income deficit for unrelated individuals (dollars)	7,939	±1,054	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	2,150	±466	69	±50	3.2%	±2.3
Worked less than full-time, year-round in the past 12 months	1,182	±298	460	±176	38.9%	±12.0
Did not work	2,304	±470	1,184	±320	51.4%	±7.5
Population in housing units for whom poverty status is determined	27,081	±1,329	5,661	±966	20.9%	±3.4

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Label	Total		Percent		Percent of specified language speakers							
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
					Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	25,359	±1,326	(0)	(0)	24,297	±1,341	95.8%	±1.3	1,062	±330	4.2%	±1.3
Speak only English	22,939	±1,311	90.5%	±1.9	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Speak a language other than English	2,420	±484	9.5%	±1.9	1,358	±338	56.1%	±9.6	1,062	±330	43.9%	±9.6
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	1,329	±389	5.2%	±1.5	717	±251	54.0%	±12.2	612	±251	46.0%	±12.2
5 to 17 years old	331	±176	1.3%	±0.7	289	±163	78.2%	±21.0	72	±72	21.8%	±21.0
18 to 64 years old	936	±274	3.7%	±1.1	434	±167	46.4%	±13.9	602	±210	63.6%	±13.9
65 years old and over	62	±52	0.2%	±0.2	24	±26	38.7%	±39.3	38	±45	61.3%	±39.3
Diver Indo-European languages	550	±264	2.2%	±1.1	382	±173	69.5%	±22.5	168	±170	30.5%	±22.5
5 to 17 years old	9	±16	0.0%	±0.1	9	±16	100.0%	±100.0	0	±24	0.0%	±100.0
18 to 64 years old	403	±176	1.6%	±0.7	323	±156	80.1%	±13.8	80	±83	19.9%	±13.8
65 years old and over	138	±130	0.5%	±0.5	50	±55	36.2%	±48.2	88	±119	63.8%	±48.2
Asian and Pacific Island languages	344	±161	1.4%	±0.6	136	±118	39.5%	±26.9	208	±118	60.5%	±26.9
5 to 17 years old	57	±57	0.2%	±0.2	9	±22	15.8%	±34.8	48	±52	84.2%	±34.8
18 to 64 years old	214	±132	0.8%	±0.5	126	±114	58.9%	±28.9	88	±67	41.1%	±28.9
65 years old and over	73	±76	0.3%	±0.3	1	±3	1.4%	±3.8	72	±74	98.6%	±3.8
Other languages	197	±129	0.8%	±0.5	123	±93	62.4%	±27.1	74	±74	37.6%	±27.1
5 to 17 years old	36	±49	0.1%	±0.2	31	±49	86.1%	±37.3	5	±10	13.9%	±37.3
18 to 64 years old	131	±102	0.5%	±0.4	92	±79	70.2%	±27.3	39	±47	29.8%	±27.3
65 years old and over	30	±45	0.1%	±0.2	0	±24	0.0%	±58.2	30	±45	100.0%	±58.2
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	19,375	±968	(0)	(0)	19,063	±992	98.4%	±0.6	312	±106	1.6%	±0.6
Speak only English	18,174	±1,007	93.8%	±1.4	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Speak a language other than English	1,201	±269	6.2%	±1.4	899	±242	74.0%	±8.3	312	±106	26.0%	±8.3
Spanish	622	±186	2.7%	±1.0	367	±165	70.3%	±12.6	165	±72	26.7%	±12.6
Other languages	679	±210	3.5%	±1.1	622	±196	76.9%	±11.8	167	±84	23.1%	±11.8

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Kerianne Linn, A.A.E.
Phone: 574-800-3221
Address: 4477 Progress Drive
South Bend, IN 46628

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.

Coordinador: Kerianne Linn, A.A.E.
Teléfono: 574-800-3221
Dirección: 4477 Progress Drive
South Bend, IN 46628



U.S. Department of Transportation
Federal Aviation Administration

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