Tulsa Airports Improvement Trust

Title VI Program

Approved by Airport CEO
March 31, 2024

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TULSA AIRPORTS IMPROVEMENT TRUST (TAIT)
TITLE VI PROGRAM
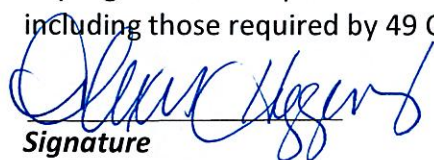# Title VI, Civil Rights Act of 1964

1. Title VI Policy Statement[1]

Tulsa Airports Improvement Trust (TAIT) 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.

TAIT further assures every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs are federally funded or not. TAIT 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 TAIT will take action to involve them and the public in the decision-making process.

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

TAIT's Title VI Coordinator, Patti Colbry, is available by phone at 918-838-5005 and by email PattiColbry@TulsaAirports.com and is responsible for overseeing TAIT's compliance with Title VI program and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

Signature
Alexis Higgins
Chief Executive Officer

March 31, 2024
Effective Date

March 31, 2027
3-Year Expiration Date

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

2. <u>Administration</u>

TAIT's CEO has reviewed and adopted this Title VI Plan for TAIT. 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 CEO or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by TAIT's CEO and resubmittal to FAA.

In addition to the coordinator, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	TAIT Program / Office
Sandra Charon	DBELO
Chief of Police Daniel Hansen	Manages telephone on-demand translation services
Stephanie Chester	Director of Marketing and Community Relations, Website, Community Advisory Group
Kim Kuehler	Communications Manager/Social Media/Print Media
Jeff Shaw	Secretary of TAIT Board of Trustees

TAIT has the following airport program sub-recipients:

Sub-Recipients
None

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

Federal Source	Grant Number	Amount
Oklahoma Aeronautics Commission	TUL-23-PREP	$3,600,000
FAA AIP	#3-40-0099-107	$1,500,000

In addition, TAIT'S 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
None		

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

Federal Source	Grant Award Information Available at:
None	

3. Grant and Procurement Assurances
49 CFR § 21.7 (a)(1); 49 CFR Part 21 Appendix C (b)

TAIT 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. TAIT requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. To accomplish this, TAIT uses boilerplate solicitation and contract documents which contain the required clauses. All contracts, including leases, subleases, licenses, or solicitations, including the rare instance when we are not using a boilerplate form are reviewed by the risk and legal services department, and if necessary, an attorney. The required contract provision review is always part of the process.

Description of Oversight Methods for Subcontracts
TAIT's boilerplate solicitation and contract documents contain the appropriate Civil Rights clauses.
Engineering construction and professional services contracts will be the only contracts with subcontractors. TAIT does not allow subcontracting in other contracts.
DBELO reviews engineering contracts and subcontracts for appropriate information, including Civil Rights clauses, prior to issuance of a Notice to Proceed.

4. Title VI Coordinator Responsibilities

The coordinator is responsible for ensuring that they and other staff supporting the Title VI Program 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 the Training Section for more information about the expected training for all staff.

Among other responsibilities, the coordinator and/or Supporting Staff:

- Proactively ensures that TAIT's compliance with nondiscrimination requirements of Title VI and reports to TAIT 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 TAIT'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 may 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. <u>Notice</u>
49 CFR Part 21 Appendix C(b)(2)(ii)

TAIT 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.

TAIT has posted the above Title VI policy statement at its staff offices and website at: https://flytulsa.com/business/business-opportunities/businessopportunities/business-diversity-and-development/.

TAIT will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be implemented by December 15, 2023 by tenants meeting and email.

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 –Gate A3, North End of Terminal)	0	2	0
TSA Checkpoint Entrance	0	1	0
Terminal B – Across from Gate B1, North End of Terminal)	0	2	0
Ticketing (Entrance area by American, Southwest & Center Entrance)	3	0	0
Mezzanine Level – (B-218 office, A-211 office, TSA Checkpoint Entrance)	3	0	0
Baggage Claim A – Entrance/Exit Door	2	0	0
Baggage Claim B – Entrance/Exit Door	2	0	0
Schwab Hall – Center Entrance Door	1	0	0
Parking Garage Tunnel Entrance – A	1	0	0
Parking Garage Tunnel Entrance – B	1	0	0

Outreach to Affected Communities

The Director of Marketing and Community Relations will actively engage with community educators and community groups to ensure that representation is shown in airport activities

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

and initiatives. The Director of Marketing and Community Relations is the lead communicator for the Cultural Advisory Group (CAG), which consists of representatives from local art groups and organizations in the Tulsa area, that make decisions on including art pieces and displays at the airport. CAG ensures that representation is a main priority for art at the airport. The Director of Marketing and Community Relations is also responsible for planning community engagement events that invite the public from different groups in Tulsa to visit the airport and learn more about our field. Lastly, the Director of Marketing and Community Relations is the lead point of contact for website translation services and updates the website accordingly to ensure the proper translation services are available on the website.

TAIT will create a detailed CPP by April 1, 2024. A copy of the plan will be available at https://flytulsa.com/business/business-opportunities/businessopportunities/business-diversity-and-development/

To ensure that the community is effectively informed of and able to participate in public hearings, TAIT Board Secretary includes public notices translated upon request into appropriate languages, including for any language spoken by a considerable number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include directions 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, TAIT will be able to identify, understand, and engage with communities of the Tulsa Metropolitan Area (TMA). The TMA includes portions of Tulsa County, Osage County, Pawnee County, Creek County, Okmulgee County, Wagoner County and Rogers County. In doing so, TAIT needs to know about communities eligible to be served, actually or potentially affected, benefited, or burdened by TAIT's airport program.

AFFECTED COMMUNITIES[3]	POPULATION
Tulsa Metropolitan Area	1,015,331
Tulsa County	669,279
Osage County	45,818
Pawnee County	15,553
Creek County	71,754
Okmulgee County	36,706
Wagoner County	80,981
Rogers County	95,240

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[3] "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. https://data.census.gov/table?t=Populations+and+People&g=310XX00US46140

(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 Communities[4].

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," TAIT 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 state of Oklahoma is approximately 15.6%. The poverty rate of the TMA remains low compared with the state. The poverty rates for the specific Affected Communities are as follows:

AFFECTED COMMUNITIES	POVERTY RATE
Tulsa County	14.9%
Osage County	13.5%
Pawnee County	15.0%
Creek County	14.3%
Okmulgee County	16.7%
Wagoner County	9.8%
Rogers County	10.0%

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.[5]

AFFECTED COMMUNITY: *TULSA COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *1,105,331*

DEMOGRAPHIC GROUP WITHIN AFFECTED COMMUNITY	Number of People in Minority Group	Percent of Total Affected Community

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[5] based on US Census Data, 2021: ACS 1-Year Estimates Subject Tables. https://data.census.gov/table?t=Income+and+Poverty&g=310M1A3US46140_310M1A6US46140_310XX00US46140_310XXA1US46140_310XXA2US46140&tid=ACSST1Y2021.S1701

[5] based on US Census Data, 2020, Decennial Census, P2, Hispanic or Latino by Race. https://data.census.gov/table?t=Race+and+Ethnicity&g=310M1A3US46140_310M1A6US46140_310XX00US46140_310XXA1US46140_310XXA2US46140&tid=DECENNIALPL2020.P2

	Population	
White	599,134	54%
Black Or African American	78,986	7%
American Indian or Alaska Native	78,075	7%
Asian	28,554	3%
Native Hawaiian or Other Pacific Islander	1,099	0%
Hispanic Or Latino	118,902	11%
Some Other Race Alone	3,227	0
Two Or More Races	101,076	9%

AFFECTED COMMUNITY: OSAGE COUNTY
TOTAL AFFECTED COMMUNITY POPULATION: 45,818

White	27,443	60%
Black Or African American	4,796	10%
American Indian or Alaska Native	6,405	14%
Asian	128	3%
Native Hawaiian or Other Pacific Islander	19	0%
Hispanic Or Latino	1,872	11%
Some Other Race Alone	96	0
Two Or More Races	5,059	9%

AFFECTED COMMUNITY: PAWNEE COUNTY
TOTAL AFFECTED COMMUNITY POPULATION: 15,553

White	11,530	74%
Black Or African American	73	0%
American Indian or Alaska Native	1,927	12%
Asian	49	0%
Native Hawaiian or Other Pacific Islander	0	0%
Hispanic Or Latino	467	3%
Some Other Race Alone	42	0%
Two Or More Races	1,465	9%

AFFECTED COMMUNITY: CREEK COUNTY
TOTAL AFFECTED COMMUNITY POPULATION: 71,574

White	51,528	72%
Black Or African American	1,452	2%
American Indian or Alaska Native	7,002	10%
Asian	290	0%
Native Hawaiian or Other Pacific Islander	67	0%
Hispanic Or Latino	3,412	5%
Some Other Race Alone	141	0%
Two Or More Races	7,862	11%

AFFECTED COMMUNITY: OKMULGEE COUNTY
TOTAL AFFECTED COMMUNITY POPULATION: 36,706

White	21,599	59%

Black Or African American	*2,742*	*7%*
American Indian or Alaska Native	*5,947*	*16%*
Asian	*160*	*0%*
Native Hawaiian or Other Pacific Islander	*22*	*0%*
Hispanic Or Latino	*1,708*	*5%*
Some Other Race Alone	*82*	*0%*
Two Or More Races	*4,446*	*12%*

AFFECTED COMMUNITY: *WAGONER COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *80,981*

White	*52,734*	*65%*
Black Or African American	*2,638*	*3%*
American Indian or Alaska Native	*8,073*	*10%*
Asian	*1,405*	*2%*
Native Hawaiian or Other Pacific Islander	*29*	*0%*
Hispanic Or Latino	*6,137*	*8%*
Some Other Race Alone	*225*	*0%*
Two Or More Races	*9,740*	*12%*

AFFECTED COMMUNITY: *ROGERS COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *98,240*

White	*62,387*	*64%*
Black Or African American	*1,103*	*1%*
American Indian or Alaska Native	*12,109*	*12%*
Asian	*1,676*	*2%*
Native Hawaiian or Other Pacific Islander	*39*	*0%*
Hispanic Or Latino	*5,257*	*5%*
Some Other Race Alone	*286*	*0%*
Two Or More Races	*12,383*	*13%*

<u>Limited English Proficiency (LEP)</u>

The goal of all language access planning and implementation is to ensure that TAIT communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning.

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.[6] The safe harbor for our community is Please refer to the end of this document to find data for all languages in our community.

The threshold we have used for identifying the languages with significant LEP populations is

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[6] 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.

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 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	Safe Harbor Threshold
English	918,609	+/-3,299	1,000
Spanish	47,560	+/-3,467	1,000

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages):

This information is updated annually[8] 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/table?q=B16001&g=3 10XX00US46140

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 Customer Experience Office conducts annual 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.

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[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.

[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 TAIT 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:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Airfield pavement (runways, taxiways, and associated aprons and pavements)	Tulsa County
Tulsa International Airport Terminals A & B	None
Existing Cargo and Maintenance Facilities	None
Landside pavement (departures, arrivals and commercial roads, and associated sidewalks)	None
Airport Rescue and Fire Fighting (ARFF) Facility	None
Economy and Employee Parking lots	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
Federal Inspection Services (FIS) facility	Tulsa County
Air Traffic Control Tower	Tulsa County

Airport Perimeter Road Rehabilitation	None

We have analyzed the above existing facilities and facility construction projects for disparate impacts based on 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		

Facilities or Construction Projects	Justification
Airport entrance Road Rehabilitation	To maintain traffic to and from the airport, there will be some modifications to the standard access. Primarily closed driving lanes, but access will not be eliminated.

8. Limited English Proficiency (LEP)
Executive Order 13166

In creating a Language Assistance Plan, TAIT will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

In the Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities.

Language
Spanish
German
Russian
Urdu
Chinese
Korean
Hmong
Vietnamese
Arabic

TAIT 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
Passenger & Guest Survey	No link available
Tenant & Pilot Survey	Recently added; no data available
DBE Outreach Events – Voluntary Survey	Recently added; no data available

[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.

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

Translation Services:

- All written notices contain a statement of how to receive translated written materials upon request.

The following vendors have been identified for written translations:

Translation Vendors	Languages
Tulsa Translation Services *https://www.uslanguageservices.com /oklahoma/tulsa-translation-services/*	*140+ Languages*

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport website translate view	*140 Languages*

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Optimal Phone Interpreter, here after referred to as the "Language Line"	*36 Languages*

Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport information desks	*36 Languages via language line*
Description of Interpretation Assistance Processes	

- *All information desks are staffed by Airport Ambassadors. Ambassadors are trained to assist customers by using Google Translate. Should Google Translate be ineffective, ambassador will call 5030 to dispatch a uniformed police officer.*
- *All Tulsa Airport uniformed police officers are provided a card for the language line through Optimal. The phone number for Optimal and our special access code to access these services are on the card. All officers are trained in the use and application of the language line.*
- *If Airport Police dispatchers need to use the language line over the phone, dispatchers are trained to access the line and facilitate the information needed via the language line.*

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 Tulsa Transit 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
Tulsa Metropolitan Area	Tulsa Transit	Not planned at this time

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
All business opportunities	https://flytulsa.com/business/business-opportunities/businessopportunities/
Business Outreach	DBELO hosts annual DBE outreach event

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 TAIT Board Secretary.

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.
- Anti-harassment training.

Refresher information will be provided annually via meetings and email.

12. <u>Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations.</u>

<u>FAA Notification</u>. The coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements[11]
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements[12]

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, TAIT 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. <u>Title VI Complaints</u>
49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

<u>Scope</u>. 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:

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[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.

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 matters[13]

3. Allege misconduct by TAIT or its sub-recipients including airport employees, contractors, concessionaires, lessees, or tenants.

4. Concern that an airport facility or actions by TAIT 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 TAIT.[14] 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 airport CEO, COO, and Director of Risk and Legal Services.

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

Patti Colbry, Title VI Coordinator
Mailing address: 7777 Airport Drive A-211
Tulsa, OK 74115
Phone: 918-838-5005
Email: PattiColbry@TulsaAirports.com

If a complaint is initially made by phone, it must be supplemented with a written complaint within 30 days after the discriminatory event occurred. 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 for 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

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[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.

[14]

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 one (1) business day.

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 the complaint 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

Written Complaints Required. If a verbal complaint is received, the complainant should be given a copy of the Airport's 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 disability.

Initial Receipt of Written Complaint. Title VI Coordinator will log in the complaint and promptly send copies of the complaint to the director of the office named in the complaint and airport CEO, COO and Director of Risk and Legal Services.

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 TAIT or one of its sub-recipients, 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 (sixty) 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. Coordinator will converse 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 may 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 any or all of the following means: negotiation, mediation, alternate dispute resolution.

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 TAIT's conclusion regarding whether unlawful discrimination occurred and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:
- The complainant may appeal in writing to the airport CEO.
- 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 airport CEO 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, TAIT will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. TAIT 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 TAIT's Title VI Coordinator.

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

Website, In-person, and Other Distribution Methods
https://www.tulsaairports.com/about-us/business-diversity-and-development/
Physical copy located in A-211

14. Population / Language Data

TABLE B16001 Label (Grouping)	Tulsa, OK Metro Area Estimate	Margin of Error
Total:	920,142	±1,354
Speak only English	822,517	±3,556
Spanish:	65,838	±2,652
Speak English "very well"	36,554	±2,556
Speak English less than "very well"	29,284	±1,966
French (incl. Cajun):	905	±461
Speak English "very well"	712	±384
Speak English less than "very well"	193	±169
Haitian:	491	±460
Speak English "very well"	325	±417
Speak English less than "very well"	166	±160
Italian:	282	±213
Speak English "very well"	213	±196
Speak English less than "very well"	69	±84
Portuguese:	460	±348
Speak English "very well"	359	±310
Speak English less than "very well"	101	±122
German:	1,444	±535
Speak English "very well"	1,143	±449
Speak English less than "very well"	301	±194
Yiddish, Pennsylvania Dutch or other West Germanic languages:	271	±337
Speak English "very well"	271	±337
Speak English less than "very well"	0	±159
Greek:	475	±282
Speak English "very well"	370	±249
Speak English less than "very well"	105	±127
Russian:	1,038	±624
Speak English "very well"	813	±490
Speak English less than "very well"	225	±223
Polish:	46	±75
Speak English "very well"	46	±75
Speak English less than "very well"	0	±159
Serbo-Croatian:	0	±159
Speak English "very well"	0	±159
Speak English less than "very well"	0	±159
Ukrainian or other Slavic languages:	622	±420

Speak English "very well"	467	±383
Speak English less than "very well"	155	±139
Armenian:	0	±159
Speak English "very well"	0	±159
Speak English less than "very well"	0	±159
Persian (incl. Farsi, Dari):	524	±335
Speak English "very well"	353	±243
Speak English less than "very well"	171	±158
Gujarati:	273	±310
Speak English "very well"	273	±310
Speak English less than "very well"	0	±159
Hindi:	749	±619
Speak English "very well"	652	±544
Speak English less than "very well"	97	±118
Urdu:	1,283	±767
Speak English "very well"	1,065	±701
Speak English less than "very well"	218	±216
Punjabi:	76	±121
Speak English "very well"	76	±121
Speak English less than "very well"	0	±159
Bengali:	562	±515
Speak English "very well"	157	±171
Speak English less than "very well"	405	±393
Nepali, Marathi, or other Indic languages:	77	±120
Speak English "very well"	0	±159
Speak English less than "very well"	77	±120
Other Indo-European languages:	273	±249
Speak English "very well"	189	±185
Speak English less than "very well"	84	±104
Telugu:	290	±240
Speak English "very well"	290	±240
Speak English less than "very well"	0	±159
Tamil:	36	±57
Speak English "very well"	36	±57
Speak English less than "very well"	0	±159
Malayalam, Kannada, or other Dravidian languages:	266	±308
Speak English "very well"	226	±245
Speak English less than "very well"	40	±68
Chinese (incl. Mandarin, Cantonese):	2,437	±890
Speak English "very well"	1,229	±559
Speak English less than "very well"	1,208	±608

Japanese:	205	±163
Speak English "very well"	147	±142
Speak English less than "very well"	58	±85
Korean:	1,526	±735
Speak English "very well"	780	±431
Speak English less than "very well"	746	±395
Hmong:	2,334	±938
Speak English "very well"	1,512	±788
Speak English less than "very well"	822	±519
Vietnamese:	3,165	±1,020
Speak English "very well"	1,262	±685
Speak English less than "very well"	1,903	±791
Khmer:	97	±159
Speak English "very well"	37	±61
Speak English less than "very well"	60	±102
Thai, Lao, or other Tai-Kadai languages:	554	±563
Speak English "very well"	366	±359
Speak English less than "very well"	188	±230
Other languages of Asia:	3,409	±1,094
Speak English "very well"	459	±353
Speak English less than "very well"	2,950	±999
Tagalog (incl. Filipino):	726	±331
Speak English "very well"	638	±318
Speak English less than "very well"	88	±95
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	501	±303
Speak English "very well"	223	±158
Speak English less than "very well"	278	±229
Arabic:	1,476	±635
Speak English "very well"	1,170	±598
Speak English less than "very well"	306	±242
Hebrew:	80	±79
Speak English "very well"	60	±72
Speak English less than "very well"	20	±33
Amharic, Somali, or other Afro-Asiatic languages:	210	±291
Speak English "very well"	141	±187
Speak English less than "very well"	69	±111
Yoruba, Twi, Igbo, or other languages of Western Africa:	487	±349
Speak English "very well"	350	±271
Speak English less than "very well"	137	±133
Swahili or other languages of Central, Eastern, and Southern Africa:	444	±355
Speak English "very well"	444	±355

Speak English less than "very well"	0	±159
Navajo:	149	±171
Speak English "very well"	149	±171
Speak English less than "very well"	0	±159
Other Native languages of North America:	3,313	±1,104
Speak English "very well"	3,060	±1,111
Speak English less than "very well"	253	±146
Other and unspecified languages:	231	±240
Speak English "very well"	187	±228
Speak English less than "very well"	44	±75

	Tulsa, OK Metro Area					
	Total		**Below poverty level**		**Percent below poverty level**	
Label	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**
Population for whom poverty status is determined	1,009,778	±2,353	139,798	±6,714	13.8%	±0.7
AGE						
Under 18 years	246,409	±1,439	45,918	±4,014	18.6%	±1.6
Under 5 years	63,071	±693	14,141	±1,582	22.4%	±2.5
5 to 17 years	183,338	±1,192	31,777	±3,333	17.3%	±1.8
Related children of householder under 18 years	245,481	±1,511	45,029	±3,987	18.3%	±1.6
18 to 64 years	602,482	±1,743	77,066	±3,668	12.8%	±0.6
18 to 34 years	221,472	±1,329	35,125	±2,284	15.9%	±1.0
35 to 64 years	381,010	±1,543	41,941	±2,609	11.0%	±0.7
60 years and over	226,750	±2,396	24,968	±1,973	11.0%	±0.9
65 years and over	160,887	±863	16,814	±1,722	10.5%	±1.1
SEX						

Male	497,539	±2,152	61,152	±3,682	12.3%	±0.7
Female	512,239	±1,617	78,646	±3,839	15.4%	±0.7
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	644,989	±4,058	71,385	±4,189	11.1%	±0.6
Black or African American alone	73,754	±2,443	20,128	±2,625	27.3%	±3.4
American Indian and Alaska Native alone	70,699	±3,113	10,619	±1,541	15.0%	±2.2
Asian alone	28,198	±1,409	3,714	±1,321	13.2%	±4.6
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	38,554	±3,780	9,004	±2,280	23.4%	±5.1
Two or more races	152,505	±5,908	24,226	±2,848	15.9%	±1.9
Hispanic or Latino origin (of any race)	111,762	±544	23,406	±3,156	20.9%	±2.8
White alone, not Hispanic or Latino	624,963	±2,635	67,018	±3,837	10.7%	±0.6
EDUCATIONAL ATTAINMENT						
Population 25 years and over	678,562	±1,613	76,757	±3,523	11.3%	±0.5
Less than high school graduate	67,788	±3,484	16,985	±1,639	25.1%	±2.0
High school graduate (includes equivalency)	193,947	±4,796	27,827	±2,299	14.3%	±1.1
Some college, associate degree	207,231	±4,873	21,758	±2,216	10.5%	±1.0

Bachelor's degree or higher	209,596	±5,143	10,187	±1,503	4.9%	±0.7
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	501,285	±4,859	37,216	±2,463	7.4%	±0.5
Employed	469,851	±5,126	28,694	±2,043	6.1%	±0.4
Male	248,334	±3,743	13,845	±1,465	5.6%	±0.6
Female	221,517	±3,445	14,849	±1,429	6.7%	±0.6
Unemployed	31,434	±2,216	8,522	±1,182	27.1%	±3.3
Male	17,562	±1,649	3,763	±771	21.4%	±4.2
Female	13,872	±1,492	4,759	±819	34.3%	±4.8
WORK EXPERIENCE						
Population 16 years and over	791,426	±2,221	98,215	±4,315	12.4%	±0.5
Worked full-time, year-round in the past 12 months	345,852	±5,068	8,968	±1,017	2.6%	±0.3
Worked part-time or part-year in the past 12 months	170,909	±3,929	29,111	±1,810	17.0%	±1.0
Did not work	274,665	±4,718	60,136	±3,209	21.9%	±1.0
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	67,666	±5,135	(X)	(X)	(X)	(X)
125 percent of poverty level	182,867	±7,655	(X)	(X)	(X)	(X)
150 percent of poverty level	232,193	±9,349	(X)	(X)	(X)	(X)

185 percent of poverty level	304,566	±10,034	(X)	(X)	(X)	(X)
200 percent of poverty level	334,463	±10,212	(X)	(X)	(X)	(X)
300 percent of poverty level	511,178	±10,536	(X)	(X)	(X)	(X)
400 percent of poverty level	652,513	±9,727	(X)	(X)	(X)	(X)
500 percent of poverty level	755,122	±9,790	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	194,579	±5,183	48,202	±2,799	24.8%	±1.3
Male	94,569	±3,287	20,556	±1,605	21.7%	±1.6
Female	100,010	±3,678	27,646	±2,125	27.6%	±1.9
15 years	345	±222	345	±222	100.0%	±29.1
16 to 17 years	544	±273	544	±273	100.0%	±20.0
18 to 24 years	23,674	±2,145	9,866	±1,333	41.7%	±4.4
25 to 34 years	38,373	±2,736	7,361	±1,177	19.2%	±2.8
35 to 44 years	23,457	±2,321	5,016	±754	21.4%	±3.4
45 to 54 years	24,333	±2,005	5,616	±871	23.1%	±3.1
55 to 64 years	31,747	±2,049	9,313	±1,124	29.3%	±3.2
65 to 74 years	30,392	±1,724	6,810	±1,021	22.4%	±2.9
75 years and over	21,714	±1,502	3,331	±607	15.3%	±2.6
Mean income deficit for unrelated individuals (dollars)	7,912	±290	(X)	(X)	(X)	(X)

Worked full-time, year-round in the past 12 months	84,838	±3,884	3,110	±664	3.7%	±0.8
Worked less than full-time, year-round in the past 12 months	40,446	±2,571	14,623	±1,415	36.2%	±2.8
Did not work	69,295	±2,955	30,469	±2,223	44.0%	±2.2
Population in housing units for whom poverty status is determined	1,008,236	±2,376	138,818	±6,742	13.8%	±0.7

15. Completed Unlawful Discrimination Poster
(See next page)

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:** Patti Colbry
> **Phone:** 918-838-5005
> **Address:** 7777 Airport Drive, Tulsa OK 74115

Discriminacion Ilegal

Se prohibe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento fisico 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:** Patti Colbry
> **Teléfono:** 918-838-5005
> **Dirección:** 7777 Airport Drive, Tulsa OK 74115

U.S. Department of Transportation

Federal Aviation Administration

HQ 101093

Tulsa Airports Improvement Trust (TAIT)
Community Participation Plan (CPP)[1]

1. Administration

The purpose of this CPP is to ensure that stakeholders or communities affected[2] by Tulsa Airports Improvement Trust (TAIT) projects or operations can be informed and participate and have their input thoughtfully considered in the key stages during airport planning efforts, regardless of their race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the "protected bases"). This plan is provided in accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and related authorities.[3] This plan and associated reports regarding our CPP efforts will be communicated to the public in formats accessible to persons with disabilities and to limited English proficient (LEP) individuals.

The individuals primarily responsible for implementing the TAIT CPP are:

Responsible Official, Title	Responsibilities
1. Kim Kuehler, Communications Manager	Press releases, media advisories, newspaper ads for public notifications. Newsletters to community organizations and employees.
2. Stephanie Chester, Director of Marketing and Community Relations	Posts RFQs/RFPs, communication, and business opportunity notices to website. Newsletters to airport tenants.
3. Jeff Shaw, Director of Risk & Legal	Posts Board of Trustees meetings
4. Eric Kien, Facilities Support Manager	Posts RFQs/RFPs to Tulsa World newspaper
5. Sheri Rider, Concessions Manager	Receives new vendor requests forms
6. Sandra Charon, DBELO	Manages airport DBE program
Cynthia Gifford, Environmental Compliance Coordinator	Ensures operations comply with relevant environmental laws, regulations, and policies.
Frank Relja, Director of Engineering & Planning	Leads planning for all processes for specific engineering projects.

Responsible officials' contact information is shared with the public through the following methods:

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[1] See DOT Order 1000.12C, "The U.S. Department of Transportation (DOT) Title VI Program," Ch. 2, Sec. 4. (Jun. 11, 2021). https://www.transportation.gov/sites/dot.gov/files/2021-08/Final-for-OST-C-210312-002-signed.pdf

[2] Within this CPP, the term "affected" also means *served*, in addition to *positively or negatively impacted*.

[3] Related authorities include the Age Discrimination Act of 1975; Sec. 520 of the Airport and Airway Improvement Act of 1982; and the Civil Rights Restoration Act of 1987.

Website, In-person, and Other Communication Methods

1.https://flytulsa.com/

3. Airport updates sent via email newsletters to community organizations, tenants, and employees.

2. Administrative office phone number: 918-838-5000

3. Airport updates sent via email newsletters to community organizations, tenants, and employees.

4. In-person, as appropriate

In addition, TAIT will ensure that members of the public are advised of our nondiscrimination obligations. This includes how to file discrimination complaints with TAIT and the FAA. We will also conspicuously display the FAA-provided Unlawful Discrimination Posters at airport facilities. See Notice section of TAIT's Title VI Plan.

TAIT also makes this CPP available through the following methods when engaging members of the public concerning planning efforts:

Website, In-person, and Other Distribution Methods

1. **https://flytulsa.com/business/business-opportunities/businessopportunities/business-diversity-and-development/** The Title VI Program and also CPP must be added to this site.

2. Goals and Objectives

This CPP applies to all airport planning and decision-making efforts, whether or not directly supported by Federal assistance. This includes surveys, public meetings (e.g., airport commission meetings), and hearings, not only meetings for a project requiring an environmental impact statement (EIS) or environmental assessment (EA).

TAIT's planning processes that lead to decisions for projects or operations or those of any sub-recipients are:

Planning Processes

1. Airport Master Planning – the last MP was completed in 2016 following the FAA guidelines for public participation and interaction

2.Public outreach for DBE participation for federally funded projects. These outreach sessions are held in conjunction with he projects pre-bid meetings.

3.Public advertisement of Notice to Bidders on all capital projects

4.Public access to the Airports 5-year Capital Improvement Plan

TAIT seeks public input for the above processes through the following methods:

Public Input Methods	Planning Process(es) that use each Method
Public meetings to describe future improvements	#1
B. Public notification of upcoming projects	#1,2,3,4

3. Identification of and Focused Outreach to Affected Communities

See Community Statistics section of TAIT's Title VI Plan, for detailed discussion of Affected Communities.

The specific steps TAIT will take to communicate with, inform, educate, consult, or solicit input from, and expand opportunities for engagement with each Affected Community,[4] are provided below.

Affected Community	Key Community Representatives	Focused Outreach Steps
Tulsa Metropolitan Area (TMA)	Tulsa City Council, Tulsa Regional Chamber, community groups, business groups, schools	a. Attend/sponsor events as appropriate b. Engage schools with educational programs
City of Jenks	Jenks Chamber of Commerce, community groups, business groups, school	a. Attend/sponsor events as appropriate b. Engage schools with educational programs
City of Broken Arrow	Broken Arrow Chamber of Commerce, community groups, business groups, school	a. Attend/sponsor events as appropriate b. Engage schools with educational programs

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[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.

| *City of Owasso* | Owasso Chamber of Commerce, community groups, business groups, school | a. Attend/sponsor events as appropriate |
| | | b. Engage schools with educational programs |

4. Effective Communication

TAIT will ensure that public engagement is effective, meaningful, and free of linguistic, economic, historical, and cultural barriers to participation. Every effort will be taken to ensure clear, plain, and effective communication with Affected Communities, including materials in accessible formats for persons with disabilities and in languages other than English. See Limited English Proficiency (LEP) section of TAIT's Title VI Plan.

5. Communication Platforms

Diverse communication platforms will be utilized to effectively reach the broadest audience. We will use the following platforms to communicate project details, our nondiscrimination obligations, and contact information for the public to share project or operational feedback with our office and the FAA.

Social media, Monitors, and Other Communication Platforms

1. Social media platforms, where applicable. Facebook, Twitter (X), Instagram, LinkedIn, YouTube
2. Digital signage in the airport terminal
3. FlyTulsa.com, PropelTUL.com
4. Press releases to media partners

6. Records

This section includes the procedures TAIT will follow to document our outreach efforts. Records for steps taken to provide outreach to Affected Communities will be maintained in the following locations:

Website, In-person, and Other Storage Methods

1. FlyTulsa.com, where applicable
2. TAIT Internal Storage Drives

Records will be kept for community input. The records will document how TAIT considered, weighed, and incorporated input received. The records will include justifications for any decisions contrary to community feedback. The records will be stored in the following locations:

Website, In-person, and Other Storage Methods

1. FlyTulsa.com, where applicable
2. TAIT Internal Storage Drives

Records for demographics of participants will also be kept. Requested demographic information will include race, national origin, sexual orientation, gender identity, creed, age, disability, languages spoken, and community membership.[5] Demographic information will be requested by the following methods: [*For example, voluntary disclosure by attendees in sign-in sheets or through registration process*]

Demographic Information Collection Methods

Customer satisfaction surveys

Customer complaints

Airport event sign-in sheets

TAIT Board of Trustees demographic survey

Bids/proposals for airport contracts-voluntary survey

CPP records will be made available to the public using the same methods for other information outlined within this plan.

7. Reporting Outcomes

Within 30 days of the end of each fiscal year (FY), TAIT will create a CPP Report for that current FY. The report will summarize efforts taken under this CPP in a narrative statement describing:

1. The specific steps taken to produce meaningful engagement with Affected Communities that FY,
2. The results of those efforts for that FY, and
3. How the Affected Communities' comments and views are or will be incorporated into the decision-making process.

The CPP Reports will be included with TAIT's Title VI Plan. If no current Title VI Plan exists, the CPP Reports will be added to its Title VI Assessment for each grant.

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[5] This information is solicited to demonstrate compliance with Title VI and related requirements. See 49 CFR § 21.9(b); 49 U.S.C. § 47123; 28 CFR § 42.406; and FAA Order 1400.11.

Appendix 1

Complete only if required by Section 3

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, TAIT will be able to identify, understand, and engage with communities of the Tulsa Metropolitan Area (TMA). The TMA includes portions of Tulsa County, Osage County, Pawnee County, Creek County, Okmulgee County, Wagoner County and Rogers County. In doing so, TAIT needs to know about communities eligible to be served, actually or potentially affected, benefited, or burdened by TAIT's airport program.

Affected Communities[6]	Population
Tulsa Metropolitan Area	1,015,331
Tulsa County	669,279
Osage County	45,818
Pawnee County	15,553
Creek County	71,754
Okmulgee County	36,706
Wagoner County	80,981
Rogers County	95,240

(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 Communities[7].
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," TAIT 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 state of Oklahoma is approximately 15.6%. The poverty rate of the TMA remains low compared with the state. The poverty rates for the specific Affected Communities are as follows:

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[6] "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.

[7] 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 Communities	Poverty Rate
Tulsa County	14.9%
Osage County	13.5%
Pawnee County	15.0%
Creek County	14.3%
Okmulgee County	16.7%
Wagoner County	9.8%
Rogers County	10.0%

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[8]:

AFFECTED COMMUNITY: *TULSA COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *1,105,331*

DEMOGRAPHIC GROUP WITHIN AFFECTED COMMUNITY	Number of People in Minority Group	Percent of Total Affected Community Population
White	599,134	54%
Black Or African American	78,986	7%
American Indian or Alaska Native	78,075	7%
Asian	28,554	3%
Native Hawaiian or Other Pacific Islander	1,099	0%
Hispanic Or Latino	118,902	11%
Some Other Race Alone	3,227	0
Two Or More Races	101,076	9%

AFFECTED COMMUNITY: *OSAGE COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *45,818*

White	27,443	60%
Black Or African American	4,796	10%
American Indian or Alaska Native	6,405	14%
Asian	128	3%
Native Hawaiian or Other Pacific Islander	19	0%
Hispanic Or Latino	1,872	11%
Some Other Race Alone	96	0
Two Or More Races	5,059	9%

AFFECTED COMMUNITY: *PAWNEE COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *15,553*

White	11,530	74%

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[8] Recommend using demographic groups from the U.S. Census.

Black Or African American	*73*	*0%*
American Indian or Alaska Native	*1,927*	*12%*
Asian	*49*	*0%*
Native Hawaiian or Other Pacific Islander	*0*	*0%*
Hispanic Or Latino	*467*	*3%*
Some Other Race Alone	*42*	*0%*
Two Or More Races	*1,465*	*9%*

AFFECTED COMMUNITY: *CREEK COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *71,574*

White	*51,528*	*72%*
Black Or African American	*1,452*	*2%*
American Indian or Alaska Native	*7,002*	*10%*
Asian	*290*	*0%*
Native Hawaiian or Other Pacific Islander	*67*	*0%*
Hispanic Or Latino	*3,412*	*5%*
Some Other Race Alone	*141*	*0%*
Two Or More Races	*7,862*	*11%*

AFFECTED COMMUNITY: *OKMULGEE COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *36,706*

White	*21,599*	*59%*
Black Or African American	*2,742*	*7%*
American Indian or Alaska Native	*5,947*	*16%*
Asian	*160*	*0%*
Native Hawaiian or Other Pacific Islander	*22*	*0%*
Hispanic Or Latino	*1,708*	*5%*
Some Other Race Alone	*82*	*0%*
Two Or More Races	*4,446*	*12%*

AFFECTED COMMUNITY: *WAGONER COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *80,981*

White	*52,734*	*65%*
Black Or African American	*2,638*	*3%*
American Indian or Alaska Native	*8,073*	*10%*
Asian	*1,405*	*2%*
Native Hawaiian or Other Pacific Islander	*29*	*0%*
Hispanic Or Latino	*6,137*	*8%*
Some Other Race Alone	*225*	*0%*
Two Or More Races	*9,740*	*12%*

AFFECTED COMMUNITY: *ROGERS COUNTY*
TOTAL AFFECTED COMMUNITY POPULATION: *98,240*

White	*62,387*	*64%*
Black Or African American	*1,103*	*1%*
American Indian or Alaska Native	*12,109*	*12%*
Asian	*1,676*	*2%*
Native Hawaiian or Other Pacific Islander	*39*	*0%*
Hispanic Or Latino	*5,257*	*5%*

Some Other Race Alone		*286*	*0%*
Two Or More Races		*12,383*	*13%*

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that TAIT communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages[9] that are spoken in LEP households in the Affected Communities. The data source is the US Census Bureau. *https://data.census.gov/table?q=B16001&g=310XX00US46140*

The threshold we have used for identifying the languages with significant LEP populations is the DOT safe harbor threshold, which is 5% or 1,000, whichever is less.[10] 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
English	918,609	+/-3,299
Spanish	47,560	+/-3,467

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages):

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
Spanish				X
Other Indo-European languages	X			
Asian & Pacific Island languages	X			

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

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[9] 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.

[10] 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
Spanish
German
Russian
Urdu
Chinese
Korean
Hmong
Vietnamese
Arabic

This information is updated 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/table?q=B16001&g=3 10XX00US46140

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
- *The Airport Customer Experience Department conducts annual 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.*
- *The Airport Marketing Department conducts annual surveys of tenants and pilots. The survey includes a voluntary request for demographic information.*

Staff and Advisory Board Diversity.

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

Description of Employee and Advisory Board Demographic Information Collection Methods
- *Employees are asked to submit voluntary confidential demographic information at time of hiring.*
- *Beginning March 2024 and every four years thereafter, the airport administration sends an email to all board members asking them to enter demographic information voluntarily and anonymously through an online survey via the following link:*

Appendix 2

Complete only if required by Section 4

In creating a Language Assistance Plan, the TAIT will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

In the Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities.

Language
Spanish
German
Russian
Urdu
Chinese
Korean
Hmong
Vietnamese
Arabic

TAIT 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
Passenger & Guest Survey	No link available
Tenant & Pilot Survey	Recently added; no data available
DBE Outreach Events – Voluntary Survey	Recently added; no data available
TUL Website Guest User Language Preference	No link available

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[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.

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

Language
Spanish
Asian and Pacific Island Languages
Other Indo-European Languages

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 TAIT 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 of how to receive translated written materials upon request.

- The following vendors have been identified for written translations:

Translation Vendors	Languages
Tulsa Translation Services *https://www.uslanguageservices.com* */oklahoma/tulsa-translation-services/*	*140+ Languages*

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport Administration Offices	*140+ Languages*

Interpretation Services:
- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Optimal Phone Interpreter, here after referred to as the "Language Line"	*36 Languages*
Airport Website https://flytulsa.com/	*140+ Languages*

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport information desks	*36 Languages via language line*

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Description of Interpretation Assistance Processes
Airport Ambassadors staff all information desks. Ambassadors are trained to assist customers by using Google Translate. Should Google Translate be ineffective, ambassador will call 5030 to dispatch a uniformed police officer.
All Tulsa Airport uniformed police officers are provided a card for the language line through Optimal. The phone number for Optimal and our exclusive access code to access these services are on the card. All officers are trained in the use and application of the language line.
If Airport Police dispatchers need to use the language line over the phone, dispatchers are trained to access the line and facilitate the information needed via the language line.

Description of Interpretation Assistance Processes

- *Airport Customer Service Office maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers.[12] 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 contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. 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. 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.*

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[12] The list will confirm whether each employee is proficient to provide interpretation and/or translation services.