



## Tweed-New Haven Airport Authority

### Title VI Plan


#### 1. Title VI Policy Statement<sup>1</sup>

The Tweed-New Haven 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.

The Tweed-New Haven 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. Any time communities may be impacted by programs or activities, the Tweed-New Haven Airport Authority will take action to involve them and the general public in the decision-making process.

The Tweed-New Haven 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 the Tweed-New Haven Airport Authority and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Malena Zanjani, available at 203-868-9825 and hvnadministration@flytweed.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.

  
[robert reed \(Nov 7, 2024 14:19 EST\)](#)

Robert Reed  
Chairman  
Tweed-New Haven Airport Authority

Nov 7, 2024

**Effective Date**

Nov 7, 2027

**3-Year Expiration Date**

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

## **2. Administration**

The Board of Directors has reviewed and adopted this Title VI Plan for the Tweed-New Haven 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 Executive Director’s or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Board of Directors and resubmittal to FAA.

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

<b>Staff Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
Felipe Suriel	Assistant Airport Manager – Avports HVN LLC / The New HVN LLC
Tom Cavaliere	Director of Community Engagement
Timothy Sullivan	Business Analysis
	Avports Support Staff

As of the date of this plan, the Tweed-New Haven Airport Authority has the following pending applications for Federal financial assistance:

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
FAA AIP	ARFF Vehicle	\$1,043,310
FAA AIP	Residential Sound Insulation Program – Phase 1 Design	\$599,900
FAA BIL ATP	East Passenger Terminal Design	\$2,500,000

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

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
FAA AIP	<a href="https://www.faa.gov/airports/aip/">https://www.faa.gov/airports/aip/</a>

## **3. Grant and Procurement Assurances**

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

The Tweed-New Haven 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](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/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. The Tweed-New Haven 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**

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The Coordinator periodically reviews applicable sections of subcontracts to audit for the inclusion of Civil Rights clauses. Contracts require Contractors to submit subcontracts to the Sponsor at time of execution for review of Title VI language. The clauses are reviewed by the Title VI Coordinator or his or her designee.

### **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 the 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 the Tweed-New Haven Airport Authority's 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, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

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

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

## **5. Notice**

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

The Tweed-New Haven 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,<sup>2</sup> and maintained. The poster template is available at [https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/com\\_civ\\_support/non\\_disc\\_pr/](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.

The Tweed-New Haven Airport Authority has posted the above Title VI policy statement at its staff offices.

The Tweed-New Haven Airport Authority will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants by September 30, 2024, pending formal approval from the FAA.

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

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<sup>2</sup> For more information about website accessibility, please visit ADA.gov.

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>	<b>Additional Quantities</b>
Arrival's Terminal	3	N/A	N/A
Departure's Terminal	4	6	N/A
FBO	N/A	N/A	1

Outreach to Affected Communities

Airport administration ensures that notices for public meetings reach all segments of the impacted community. The Title VI Coordinator will identify the effective media platforms to share announcement and notices. Announcements are made on social media platforms, through email broadcast, and/or on the airport website. Airport administration contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> 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.

Detailed information on our public notice and outreach procedures is available in the Tweed-New Haven Airport Authority CPP. A copy of the CPP is available at [www.flytweed.com](http://www.flytweed.com). A copy of each CPP report completed since the last Title VI Plan is [www.flytweed.com](http://www.flytweed.com)

The Tweed-New Haven Airport Authority will create a detailed CPP by the end of 2024. A copy of the plan will be available at [www.flytweed.com](http://www.flytweed.com).

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

**6. Community Statistics**

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the Tweed-New Haven Airport Authority will be able to identify, understand, and engage with communities. In doing so, the Tweed-New

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<sup>3</sup> 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.

Haven Airport Authority needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by the Tweed-New Haven Airport Authority’s airport program.

Affected Communities <sup>4</sup>	Population
06512 – East Haven, CT & New Haven, CT	29,191

(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<sup>5</sup>.

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” The Tweed-New Haven 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 Affected Communities is approximately 12.8%. The poverty rate remains low compared with the rest of the state. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
06512 – East Haven, CT & New Haven, CT	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<sup>6</sup>:

Affected Community: 06512  
 Total Affected Community Population: 29,191

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	22,234	76%

<sup>4</sup> “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.

<sup>5</sup> 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.

<sup>6</sup> Recommend using demographic groups from the U.S. Census.

Black or African American	1,698	6%
American Indian or Alaska Native	20	0%
Asian	804	3%
Native Hawaiian or Other Pacific Islander	3	0%
Some other race alone	2,328	8%
Two or more races	2,104	7%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that the Tweed-New Haven Airport Authority communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>7</sup> that are spoken in LEP households in the Affected Communities. The data source is 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.<sup>8</sup> 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.

<b>Languages Spoken by LEP Population that Meet the Safe Harbor Threshold</b>	<b>Number</b>	<b>Margin of Error</b>
Spanish	2,729	+/-589

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

<b>Languages Spoken by LEP Persons</b>	<b>A few times a year (12 or less days a year)</b>	<b>Several times a month (13 to 51 days a year)</b>	<b>At least once a week (52 to 364 days a year)</b>	<b>Every day (365 days a year)</b>
Spanish				X
Korean	X			
French		X		

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

<sup>7</sup> 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.

<sup>8</sup> 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

None

This information is updated annually<sup>9</sup> through checking the following resources:

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

### 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 administration conducts surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services.
- An anonymous demographic survey is available for participants at small business workshops, pre-bid meetings, and other airport sponsored public/community meetings to complete.
- Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.
- A link to the electronic survey is posted on the website, at the end of the customer experience survey, and within meeting notices.

### Staff and Advisory Board Diversity.

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

#### **Description of Employee and Advisory Board Demographic Information Collection Methods**

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

<sup>9</sup> 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 airport 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.<sup>10</sup>

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

<b>Existing Airport Facilities</b>	<b>Affected Community Impacted by Operation of the Facility</b>
Airport Terminal	None
ARFF Station	None
Airfield Facilities	None
SRE Storage Facility	None
Parking Lots A, B and C	None
FBO	None
Airport Operations Facility	None
Control Tower /FAA Tech Ops	None

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years:

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by Construction of the Facility</b>
Runway 2-20 Extension	None
East Terminal TWY	None
East Terminal Apron	None
SRE Storage Facility	None
GA Ramp Taxilane	None
Terminal Expansion	None
Land Acquisition / Obstruction Removal	None
ARFF Station Expansion	None

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.

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<sup>10</sup> 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.

The following have disparate impacts:

<b>Facilities or Construction Projects with Disparate Impacts</b>	<b>Affected Community Impacted</b>	<b>Impact Can Be Eliminated?</b>
None	None	None

**Justifications:**

<b>Facilities or Construction Projects</b>	<b>Justification</b>
None	None

**8. Limited English Proficiency (LEP)**

**Executive Order 13166**

In creating a Language Assistance Plan, the Tweed-New Haven 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

The Tweed-New Haven Airport Authority also collects data for languages spoken by airport guests.<sup>11</sup> Data sources include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
Survey vendors, TSA, concessions	N/A
Airline-provided data	N/A
Assumption from flight origin / destination	N/A
Customer Service Representatives	N/A

Based on the above data, the following additional languages have been identified as likely to be

<sup>11</sup> 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.

spoken by LEP airport guests:

<b>Language</b>
Spanish

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 Tweed-New Haven 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:

<b>Translation Vendors</b>	<b>Languages</b>
Volunteer Bi-lingual Employees	All above languages

- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>	
Volunteer Bi-lingual Employees	Volunteer Bi-lingual Employees	All above languages

**Interpretation Services:**

The following vendors have been identified for interpretation services:

<b>Interpretation Vendors</b>	<b>Languages</b>	
Volunteer Bi-lingual Employees	Volunteer Bi-lingual Employees	All above languages

- Information regarding interpretation services can be obtained at:

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
Volunteer Bi-lingual Employees	Volunteer Bi-lingual Employees

## **Description of Interpretation Assistance Processes**

When an LEP person approaches an airport employee for assistance, the employee will use readily available translation software to identify which language they speak and communicate directly with the customer.

Alternatively, the employee will connect the LEP individual with an airport employee that speaks their primary language if available.

## **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 CT 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.

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
06512	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:

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
AIP Projects	Bids required to include disadvantaged business component for sub-contractors or Small Business Element. Advertise with the local Chambers of Commerce and on the Airport website.
Concessions	Airport administration will conduct direct outreach to minority and

	woman-owned businesses.
All other opportunities.	Airport administration will conduct direct outreach to minority and woman-owned businesses.

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 Airport Administration Department.

## **11. Training**

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher information will be provided 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 requirements<sup>12</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>13</sup>

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, the Tweed-New Haven 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 matters<sup>14</sup>
3. Allege misconduct by the Tweed-New Haven Airport Authority, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Tweed-New Haven Airport Authority including airport employees, contractors, concessionaires, lessees, or tenants.

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<sup>12</sup> 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.

<sup>13</sup> 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.

<sup>14</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the Tweed-New Haven Airport Authority.<sup>15</sup> 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 Director.

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

Malena Zanjani, available at and,  
155 Burr Street  
New Haven, CT 06512  
203-868-9825  
[hvnadministration@flytweed.com](mailto:hvnadministration@flytweed.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 **3 days**.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will be uploaded to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

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## **Investigation Procedure**

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

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against the Airport, 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.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state the Airport'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's 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 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 Airport will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. The Tweed-New Haven Airport employees, contractors, and tenants will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

For information on filing a complaint with DOT/FAA, please contact the Title VI Coordinator.

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

#### **Website, In-person, and Other Distribution Methods**

1 *www.flytweed.com*

## **14. Population / Language Data**

## **15. Completed Unlawful Discrimination Poster**






# Title\_VI\_Program\_Tweed-New\_Haven\_Airport\_Final\_Accepted\_063024\_v2 (1) - signed 20241107

Final Audit Report

2024-11-07

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