



Rhode Island
Airport Corporation

**RHODE ISLAND AIRPORT CORP.
RHODE ISLAND T.F. GREEN
INTERNATIONAL AIRPORT**

TITLE VI PLAN

2000 Post Rd.
Warwick, RI

1. Title VI Policy Statement¹

The Rhode Island Airport Corporation (hereinafter “RIAC”) 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.

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

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

Brittany Morgan, Esq., available at **401-691-2288** and **bmorgan@flyri.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.

January 31, 2024
Effective Date

Iftikhar Ahmad
President & CEO

January 31, 2027
3-Year Expiration Date

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

2. Administration

The RIAC President & CEO has reviewed and adopted this Title VI Plan for RIAC. 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 names. Significant revisions to our policies or federal guidelines may warrant re-adoption by the RIAC President & CEO and resubmittal to FAA.

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

| Staff Supporting Title VI Program | Airport Sponsor Program / Office |
|--|--|
| Nedjyne Victor | AVP, Business Development & GA |
| Nicole Williams | SVP, Finance & Administration |
| Dawn Mineker | EVP, Infrastructure & Operations |
| Nikolas Persson | EVP, Business Development & Public Safety |
| Shahzad Sadozai | AVP, Grants & Procurement |
| Sapha Mabrouk | Asst. Director of Executive Office & Board Affairs |
| Christine Donohoe | VP, Financial Administration |

RIAC has the following airport program sub-recipients:

| Sub-Recipients |
|-----------------------|
| None |

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

| Federal Source | Grant Number | Amount |
|-----------------------|------------------------|---------------|
| FAA ATP | PVD – Terminal Refresh | \$28,535,000 |

In addition, RIAC has 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: |
|-----------------------|---|
| FAA AIP | https://www.faa.gov/bil/airport-terminals |

3. Grant and Procurement Assurances

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

RIAC 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 that special clauses are required for certain types of contracts, such as land acquisition.
- b. RIAC requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. RIAC ensures that such clauses are in all solicitations and contracts by requiring the use of templates, which are prepared and reviewed by legal counsel, that includes such clauses. Legal counsel also reviews and approves all solicitations and contracts for substance and form to ensure that such clauses are included in all solicitations and contracts. RIAC uses the same procedures to ensure inclusion of these provisions in subconsultant/subcontractor agreements.

TEMPLATE EXAMPLE:

In all its activities within the scope of its airport program, the Contractor agrees to comply with pertinent statutes, Executive Orders, and such rules as identified in Title VI List of Pertinent Nondiscrimination Acts and Authorities to ensure that no person shall, on the grounds of race, color, national origin (including limited English proficiency), creed, sex (including sexual orientation and gender identity), age, or disability be excluded from participating in any activity conducted with or benefiting from Federal assistance.

This provision is in addition to that required by Title VI of the Civil Rights Act of 1964.

1. NONDISCRIMINATION – TITLE VI

- a. **Applicability:** This clause applies to all contracts and must be included in all subcontracts.
- b. During the performance under this AGREEMENT, CONSULTANT, for itself, its assignees, and successors in interest, agrees as follows:
 - i. **Compliance with Regulations.** CONSULTANT shall comply with the Title VI List of Pertinent Nondiscrimination Statutes and Authorities listed below in Section 2. b. vii. (“Regulations”) as they may be amended from time to time, which are hereby incorporated herein by reference and made a part of this AGREEMENT.
 - ii. **Nondiscrimination.** CONSULTANT, with regard to the SERVICES performed by it during the term of this AGREEMENT, shall not discriminate on the grounds of race, color, or

- national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. CONSULTANT will not participate directly or indirectly in the discrimination prohibited by the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR part 21.
- iii. **Solicitations for Subcontracts.** In all solicitations either by competitive bidding or negotiation made by CONSULTANT for services to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by CONSULTANT of CONSULTANT's obligations under this AGREEMENT and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
- iv. **Information and Reports.** CONSULTANT shall provide all information and reports required by the Regulations, or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by RIAC or the Federal Aviation Administration (FAA) to be pertinent to ascertain compliance with such Regulations or directives. Where any information required of a CONSULTANT is in the exclusive possession of another who fails or refuses to furnish this information, CONSULTANT shall so certify to RIAC or the FAA as appropriate, and shall set forth what efforts it has made to obtain the information.
- v. **Sanctions for Noncompliance.** In the event of CONSULTANT's noncompliance with the nondiscrimination provisions of this AGREEMENT, RIAC shall impose such contractual sanctions as it or the FAA may determine to be appropriate, including, but not limited to:
- (a) withholding of payments to CONSULTANT under this AGREEMENT until CONSULTANT complies, and/or
 - (b) cancellation, termination, or suspension of this AGREEMENT, in whole or in part.
- vi. **Incorporation of Provisions.** CONSULTANT shall include the provisions of this clause, (i) through (vi) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto. CONSULTANT shall take such action with respect to any subcontract or procurement as RIAC or the FAA may direct as a means of enforcing such provisions, including sanctions for noncompliance; provided, however, that, in the event CONSULTANT becomes involved in, or is threatened with, litigation, CONSULTANT may request the United States to enter into such litigation to protect the interests of the United States or RIAC.
- vii. **Title VI List of Pertinent Nondiscrimination Statutes and Authorities.** During the performance of this Agreement, CONSULTANT, for itself, its assignees, and successors in interest, agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 USC § 2000d *et seq.*, 78 stat. 252) (prohibits discrimination on the basis of race, color, national origin);
- 49 CFR part 21 (Non-discrimination in Federally-assisted programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964);
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 USC § 4601) (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);

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- Section 504 of the Rehabilitation Act of 1973 (29 USC § 794 *et seq.*), as amended (prohibits discrimination on the basis of disability); and 49 CFR part 27;
- The Age Discrimination Act of 1975, as amended (42 USC § 6101 *et seq.*) (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982 (49 USC § 471, Section 47123), as amended (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987 (PL 100-209) (broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act of 1990, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 USC §§ 12131 – 12189) as implemented by U.S. Department of Transportation regulations at 49 CFR parts 37 and 38;
- The Federal Aviation Administration’s Nondiscrimination statute (49 USC § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 USC 1681 *et seq.*).

Description of Oversight Methods for Subcontracts

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

4. Title VI Coordinator Responsibilities

The Title VI Coordinator, with the support of their staff, is responsible for initiating and monitoring Title VI activities, preparing required reports and other required responsibilities. This includes ensuring training is conducted, language interpretation and translation services are available, and appropriate notices are posted. This also includes updating community statistics and corresponding with the FAA, as necessary.

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

Among other responsibilities, the Coordinator:

- Proactively ensures that RIAC is in compliance with nondiscrimination requirements of Title VI and reports to RIAC leadership on the status of Title VI compliance.
- 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.

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- 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)

RIAC 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.

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

RIAC will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed following approval from the FAA via email and will be discussed at the Monthly Tenant Managers' Meeting.

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

| Terminal/FBO/Concessions/ Other Locations | Quantity in Pre-Security Area | Quantity in Post-Security Area | Additional Quantities |
|--|--|---|----------------------------------|
| Pre-Security Terminal | 3 | N/A | |
| Post-Security Terminal | 0 | 5 | |
| Interlink | 1 | N/A | |
| Rental Car Location | 1 | N/A | |

Outreach to Affected Communities

The Executive Office ensures that notices for public meetings reach all segments of the impacted community. The Title VI Coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and web postings. The Executive Office contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ and provide important feedback on translated materials. The Executive Office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

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

³ We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term "protected communities" is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

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RIAC will create a detailed CPP by April 1, 2024. A copy of the plan will be available at <https://flyri.com>

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

| Affected Communities⁴ | Population |
|---|-------------------|
| Warwick, RI | 82,197 |

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

We have identified the following facts about the Affected Communities:

Low Income Communities⁵

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” RIAC is collecting information about affected and potentially affected low-income communities. According to the *U.S. Census American Community Survey 2022 5-Year Estimate*, the overall poverty level for the City of Warwick is approximately 7.2%. The poverty rate remains low compared with the rest of the State which is at a 10.8% poverty rate. The poverty rates for the specific Affected Communities are as follows:

| Affected Communities | Poverty Rate |
|-----------------------------|---------------------|
| Warwick, RI | 7.2% |

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:

⁴ “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

⁵ Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low-income communities in airport programs and activities.

**Affected Community: Warwick, Rhode Island
 Total Affected Community Population⁶: 82,197**

| Demographic Group within Affected Community⁷ | Number of People in Minority Group | Percent of Total Affected Community Population |
|--|---|---|
| White | 71,900 | 87% |
| Black or African American | 2,424 | 2.9% |
| American Indian or Alaska Native | 282 | .3% |
| Asian | 2,272 | 2.8% |
| Native Hawaiian or Other Pacific Islander | 65 | .08% |
| Hispanic or Latino | 5,257 | 6.4% |
| More than one | 4,061 | 4.9% |
| Other Race Alone | 1,193 | 1.5% |

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that RIAC communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages that are spoken in LEP households in the Affected Communities. The data source is *U.S. Census American Community Survey 2015 5-Year Estimate*.

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

| Languages Spoken by LEP Population that Meet the Safe Harbor Threshold⁹ | Number¹⁰ | Margin of Error |
|---|----------------------------|------------------------|
| Spanish or Spanish Creole | 2,831 | +/-503 |
| Portuguese or Portuguese Creole | 1,432 | +/-411 |

Note: LEP populations encapsulate those within the City of Warwick

⁶ Demographic group totals may not equate to “Total Affected Community Population” due to margin of error present in the 5-year estimate.

⁷ The following demographic groups are the groups that appear in the U.S. Census.

⁸ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

⁹ The following language groups are the language groups that appear in the U.S. Census.

¹⁰ The following data is from the “Speak English less than ‘very well’” category for each language over the threshold.

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 or Spanish Creole | | | | X |
| Portuguese or Portuguese Creole | | | | X |

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

Additional Languages Spoken

None

This information is updated annually¹¹ 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=060XX00US4400374300 |

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 Customer Service Office conducts random surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. RIAC will include 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 a survey that includes demographic information.*

¹¹ 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.

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.*
- *Yearly conducting of State of Rhode Island Affirmative Action Plan*

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 RIAC 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.¹²

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 |
|------------------------------------|---|
| Bruce Sundlun Terminal | None |
| Interlink Facility | 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 |
|---|--|
| South Cargo Facility | 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. The following have disparate impacts:

| Facilities or Construction Projects with Disparate Impacts | Affected Community Impacted | Impact Can Be Eliminated? |
|---|------------------------------------|----------------------------------|
| None | -- | -- |

¹² In order to carry out an alternative with a discriminatory impact, RIAC must demonstrate that there was a substantial legitimate justification for the decision. RIAC must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

8. Limited English Proficiency (LEP) Executive Order 13166

In creating a Language Assistance Plan, RIAC 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 or Spanish Creole |
| Portuguese or Portuguese Creole |

RIAC also collects data for languages spoken by airport guests.¹³ Data sources include:

| Data Sources for Languages Spoken by Airport Guests | Website link to Data Source |
|--|------------------------------------|
| Assumption from flight origin / destination | N/A |

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

| Language |
|-----------------|
| None |

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform RIAC leadership and staff 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:

- Customers are directed to the Information Desk who places the individual in contact with a Customer Service Representative who will provide translation/interpretation services. The following vendors have been identified for written translations: **none**
- Information regarding translation services can be obtained at: the Information Desk and with Customer Service.

¹³ 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.

| Location for Translation Assistance | Languages |
|--|---------------------|
| Information Desk | All above languages |

Interpretation Services:

- The following vendors have been identified for interpretation services:

| Interpretation Vendors | Languages |
|-------------------------------|---------------------|
| United Language Group | All above languages |

- Information regarding interpretation services can be obtained at: the Information Desk and with Customer Service.

| Location for Interpretation Assistance | Languages |
|---|--|
| Information Desk/ Customer Service | All above languages, using United Language Group |

Description of Interpretation Assistance Processes

- Airport Customer Service Office maintains a list of volunteer multilingual employees, the languages they speak, and their associated office telephone numbers. 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 United Language Group 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 will thereafter contact United Language Group and indicate the desired interpreted language. Staff, United Language Group, and the requesting party will engage in discussion to render assistance.
- Additionally, Customer Service Staff operates translation and interpretation applications on hand held devices which allows staff to communicate with a requesting party in real time.

9. Transportation

49 Part CFR 21 Appendix C (a)(1)(ix)

In the Community Statistics section of this plan, we identified Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

The following transportation services are currently provided between the airport and the surrounding area: Ground transportation services consist of Rhode Island Public Transit Authority (RIPTA) with buses 1, 20, and 66 stopping at the far end of the commercial roadway in front of the airport terminal as well as RIPTA bus 14 stopping at our Interlink facility. In addition, weekday commuter rail service is available from the Massachusetts Bay Transit Authority as well as transportation network company services (e.g. Uber, Lyft), and private vehicles.

We have coordinated with RIPTA to encourage them to provide transit service access between the airport and other minority and disadvantaged community areas near the airport.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas.

| Minority and/or Disadvantaged Community Areas | Transit Service | Planned or Existing |
|--|--------------------------|----------------------------|
| City of Warwick | Fixed-route buses, train | Existing |

10. Minority Businesses
 49 CFR 21 Appendix C (a)(1)(x)

Bids for airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

| Airport Business Opportunity | Minority Business Outreach Methods |
|---|---|
| Concession Opportunities | Advertised through RIAC website in conjunction with advertisement through the State of Rhode Island Minority Business Enterprises Compliance office. Setting of minimal DBE goals while incorporating all ACDBE Components in all procurement requests. |
| Professional Services (i.e. design consultants, janitorial, landscaping, maintenance/repair, baggage handling etc.) | Advertised through RIAC website in conjunction with outreach to minority and disadvantaged businesses through the State of Rhode Island Minority Business Enterprises Compliance office. |
| Construction Services | Advertised through RIAC website in conjunction with outreach to minority and disadvantaged businesses through the State of Rhode Island Minority Business Enterprises Compliance office. |
| Other business opportunities, including for DBE funded projects | Advertised through RIAC website in conjunction with outreach to minority and disadvantaged businesses through the State of Rhode Island Minority Business Enterprises Compliance office. |

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 RIAC’s Procurement Department.

11. Training

New employee orientation and ongoing training incorporates Title VI topics. 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 requirements¹⁴
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹⁵

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, RIAC 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 matters¹⁶
3. Allege misconduct by the RIAC, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by RIAC including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that they have 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 RIAC. 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 the complaint and promptly send copies of the complaint to the following, Chief Legal Counsel, Chief of Staff, the department of the individual(s) involved in the complaint, and the Executive Director.

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

Brittany Morgan, Esq.
Senior Vice President, Legal Affairs & HR
2000 Post Rd. Warwick, RI 02886
bmorgan@flyri.com
401-691-2288

¹⁴ 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.

¹⁵ 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.

¹⁶ 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.

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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 24 hours of the act or occurrence.

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 the FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

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

Consultation with Legal Counsel. In each case, the Coordinator will consult with Legal Counsel regarding the investigation and the report. 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 first working with parties for informal resolution, and thereafter if unsuccessful engage in formal negotiations through mediation or arbitration.

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 RIAC'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 RIAC's Executive Director.
- The written appeal must be received within 20 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, RIAC will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. RIAC 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 Brittany Morgan, Esq., Senior Vice President, Legal & HR and Title VI Coordinator.

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

Website, In-person, and Other Distribution Methods

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| 1 Airport website: | Title VI page at https://flyri.com/passengers/accessibility/ |
| 2 In person or by mail to: | Title VI Coordinator Rhode Island Airport Corporation 2000 Post Rd., Warwick, RI 02886 |
| 3 Via email to: | compliance@pvdairport.com |
| 4 By phone: | 401-691-2288 |

14. Population / Language Data

15. Completed Unlawful Discrimination Poster