

Sample The Sanford Airport Authority Title VI Plan

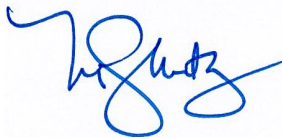
1. Title VI Policy Statement¹

The Sanford Airport Authority (SAA) 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.

SAA 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 Sanford Airport Authority agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities the SAA will take action to involve them and the general public in the decision-making process.

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

Shani Beach, available at 407-585-4023 and sbeach@sfb.osaa.net, is responsible for overseeing the Sanford Airport Authority’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.



Signature
Nicole Martz
President/CEO

January 1, 2024

Effective Date

December 31, 2026

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

Sanford Airport Authority Board of Directors has reviewed and adopted this Title VI Plan for SAA. 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 President's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Sanford Airport Authority Board of Directors and resubmittal to FAA.

In addition to the Coordinator and The Sanford Airport Authority's leadership, the following people also assist with our Title VI program requirements:

Staff Supporting Title VI Program	The Sanford Airport Authority Program / Office
<i>Shani Beach</i>	<i>Director of Properties and Executive Initiatives</i>

The Sanford Airport Authority has the following airport program sub-recipients:

Sub-Recipients
<i>None</i>

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

Federal Source	Grant Number	Amount
<i>FAA AIP</i>	<i>3-120069-xxx-2024</i>	<i>\$11,000,000</i>
<i>FAA AIP</i>	<i>3-120069-xxx-2024</i>	<i>\$845,489</i>
<i>FAA AIP</i>	<i>3-120069-xxx-2024</i>	<i>\$5,103,000</i>
<i>FAA AIP</i>	<i>3-120069-xxx-2024</i>	<i>\$500,000</i>
<i>FAA AIP</i>	<i>3-120069-xxx-2024</i>	<i>\$904,995</i>

“In addition, SAA'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
<i>None</i>		

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

Federal Source	Grant Award Information Available at:
<i>None</i>	<i>N/A</i>

3. Grant and Procurement Assurances

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

The Sanford Airport Authority will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See

https://www.faa.gov/airports/aip/grant_assurances/#current-assurances.

Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. The Sanford Airport Authority requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. Sanford Airport Authority contracts are drafted using standardized templates that incorporate non-discrimination language compliant with Title VI. This ensures consistent and fair treatment for all parties involved, regardless of race, color, or national origin.

Description of Oversight Methods for Subcontracts

If we have any subcontracts in the future we will implement the following policy: All airport program subcontracts must utilize the standardized subcontract template. The Procurement Department will audit at least 10% of annual subcontracts to confirm template language inclusion.

4. Title VI Coordinator Responsibilities

The Title VI Coordinator is responsible for ensuring that they and other staff supporting the Title VI are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications.

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

Among other responsibilities, the Coordinator:

- Proactively ensures that the Sanford Airport Authority is in compliance with nondiscrimination requirements of Title VI and reports to the Sanford Airport Authority leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.

- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Sanford Airport Authority'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 Title VI 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)

SAA 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.

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

SAA has distributed this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. Once approved, this plan will be distributed by June 1, 2024, by 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
<i>Car Rental Facility</i>	<i>4</i>	<i>0</i>	<i>0</i>
<i>Information Booth</i>	<i>2</i>	<i>0</i>	<i>0</i>
<i>Lobby</i>	<i>3</i>	<i>0</i>	<i>0</i>
<i>Baggage Claim</i>	<i>11</i>	<i>0</i>	<i>0</i>
<i>Ticket Counter</i>	<i>12</i>	<i>0</i>	<i>0</i>
<i>Gates</i>	<i>0</i>	<i>14</i>	<i>0</i>

Outreach to Affected Communities

The Sanford Airport Authority 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, and email broadcast. The Sanford Airport Authority 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 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.

Detailed information on our public notice and outreach procedures is available in the Sanford Airport Authority CPP. A copy of the CPP is available at <https://flysfb.com/business-opportunities/diversity-compliance/>.

SAA will create a detailed CPP by May 1, 2024 A copy of the plan will be available at <https://flysfb.com/business-opportunities/diversity-compliance/>

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

Affected Communities⁴	Population
<i>Goldsboro</i>	<i>2,000</i>
<i>Midway</i>	<i>10.8%</i>

(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

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.

Justice in Minority Populations and Low-Income Populations,” **Sanford Airport Authority** is collecting information about affected and potentially affected low-income communities. According to censusreporter.org the overall poverty level for the **Seminole County area surrounding the Orlando Sanford International Airport** is approximately **23.4 %**. The poverty rate remains **low**, compared with the rest of the **county**. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
Goldsboro	36%
Midway	17.0%

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 follows⁶:

Affected Community: Goldsboro Total Affected Community Population:

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	340	20.8%
<i>Black or African American</i>	1,150	71.2%
<i>American Indian or Alaska Native</i>	15	0.1%
<i>Asian</i>	30	0.2%
<i>Native Hawaiian or Other Pacific Islander</i>	5	0.1%
<i>Hispanic or Latino</i>	75	5.1%
<i>More than one</i>	50	2.9%
<i>No Response / Would Not Say</i>	20	0.1%

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

Affected Community: Midway
Total Affected Community Population:

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	101	6.08%
<i>Black or African American</i>	1,239	74.64%
<i>American Indian or Alaska Native</i>	6	0.36%
<i>Asian</i>	24	1.45%
<i>Native Hawaiian or Other Pacific Islander</i>	3	0.18%
<i>Hispanic or Latino</i>	136	8.19%
<i>More than one</i>	89	5.36%
<i>No Response / Would Not Say</i>	62	3.73%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that **Sanford Airport Authority** communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is Source: [https://data.census.gov/profile/Midway_CDP_\(Seminole_County\),_Florida?g=160XX00US1245475#populations-and-people](https://data.census.gov/profile/Midway_CDP_(Seminole_County),_Florida?g=160XX00US1245475#populations-and-people)

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

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>English Only</i>	83.5%	+/-10.1%
<i>Spanish</i>	15.9%	+/-10.5%
<i>Other Indo- European Language</i>	0%	+/-3.7%
<i>Asian and Pacific Islander Languages</i>	0.6%	+/-4.3%
<i>Other Languages</i>	0%	+/-3.7%

⁷ Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

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

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)
<i>Spanish</i>				<i>X</i>
<i>Chinese (incl. Mandarin, Cantonese)</i>	<i>X</i>			
<i>Arabic</i>	<i>X</i>			
<i>Korean</i>	<i>X</i>			
<i>French</i>	<i>X</i>			

This information is updated annually⁹ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	<i>https://data.census.gov</i>
<i>Local public-school data</i>	<i>https://www.scps.k12.fl.us/</i>
<i>Local housing and/or other assistance service data</i>	<i>https://www.sanfordha.org/</i>
<i>Consultation with community centers</i>	<i>https://www.midwaycoalition.org/</i>
<i>Data USA</i>	<i>https://datausa.io/profile/geo/sanford</i>
<i>Public health department</i>	<i>https://seminole.floridahealth.gov/</i>
<i>State demographics agency</i>	<i>https://censusreporter.org</i>

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

- *Sanford Airport Authority 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.*

⁹ Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan's 3-year period.

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.*
- *Every year, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through an online survey.*

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, the Sanford Airport Authority activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.¹⁰

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

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
<i>Runway 1836</i>	<i>Midway Community</i>

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
<i>None</i>	<i>N/A</i>

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:

¹⁰ In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

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

Justifications: N/A

Facilities or Construction Projects	Justification
<i>None</i>	<i>N/A</i>

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the **Sanford 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
<i>Spanish</i>
<i>Chinese (incl. Mandarin, Cantonese)</i>
<i>Tagalog (incl. Filipino)</i>
<i>Vietnamese</i>
<i>Arabic</i>
<i>Korean</i>
<i>French</i>

The Sanford Airport Authority also collects data for languages spoken by airport guests.¹¹ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Assistance requests to airport information desks</i>	<i>N/A</i>

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

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.

Language

None

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the **Sanford Airport Authority** of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

Translation Services:

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

Translation Vendors	Languages
<i>None</i>	

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>None</i>	

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>None</i>	

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Airport Webpage</i>	<i>Chinese, Dutch, French, German, Portuguese, Spanish</i>

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. The list indicates whether each employee is proficient to provide interpretation and/or translation services. 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 provides language translation through Google Translate on the webpage.*

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 Lynx 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
None	N/A	N/A

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
<i>Shuttle Vehicle Maintenance Contract</i>	<i>Advertised through all local chambers of commerce, minority and woman owned business outreach email list</i>
<i>Parking Lot Operations Contract</i>	<i>Followed procedures for State Minority and Woman Owned Business Enterprise Program</i>
<i>Groundskeeper Contract</i>	<i>Bids required to include disadvantaged business mentor component for sub-contractors</i>

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 SAA Contract office.

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 requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

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

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

13. Title VI Complaints

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

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

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

¹² Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

¹³ Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

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

4. Concern an airport facility or actions by the Sanford Airport Authority including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis 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 Sanford Airport Authority.¹⁵ Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the Airport President.

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

Shani Beach
Director of Properties and Executive Initiatives
Sanford Airport Authority
1200 Red Cleveland Blvd. Sanford, FL 32773
sbeach@sfb.osaa.net
(407) 585 – 4023

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 upload the complaint to the FAA Civil Rights Connect System. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

Assignment of Investigator. The Coordinator will immediately begin the investigation or 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 Sanford Airport Authority** the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

Investigation Report. After completing the investigation, the Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Coordinator will consult with Legal Counsel regarding the investigation and the report. Airport Legal Counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through negotiation, and/or 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 Sanford Airport Authority's conclusion regarding whether unlawful discrimination occurred and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

- The complainant may appeal in writing to the Sanford Airport Authority President.
- The written appeal must be received within 30 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 Sanford Airport Authority President 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 Sanford Airport Authority will identify and implement measures to reduce the chances of similar discrimination in the future.

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

For information on filing a complaint with DOT/FAA, please contact Shani Beach.

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

Website, In-person, and Other Distribution Methods

1 <https://flysfb.com/business-opportunities/diversity-compliance/>

2 1200 Red Cleveland Blvd. Sanford, Florida 32771

14. Population / Language Data

[Insert the full B16001 and S1701 tables for your area from www.census.gov]

	Seminole County, Florida					
	Total	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over	455,122	(X)	418,566	92.0%	36,556	8.0%
Speak only English	343,934	75.6%	(X)	(X)	(X)	(X)
Speak a language other than English	111,188	24.4%	74,632	67.1%	36,556	32.9%
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	70,850	15.6%	48,124	67.9%	22,726	32.1%
5 to 17 years old	9,462	2.1%	7,640	80.7%	1,822	19.3%
18 to 64 years old	51,638	11.3%	35,961	69.6%	15,677	30.4%
65 years old and over	9,750	2.1%	4,523	46.4%	5,227	53.6%
Other Indo-European languages	21,139	4.6%	14,321	67.7%	6,818	32.3%
5 to 17 years old	3,496	0.8%	2,078	59.4%	1,418	40.6%
18 to 64 years old	15,284	3.4%	11,054	72.3%	4,230	27.7%
65 years old and over	2,359	0.5%	1,189	50.4%	1,170	49.6%
Asian and Pacific Island languages	12,908	2.8%	7,303	56.6%	5,605	43.4%
5 to 17 years old	1,522	0.3%	953	62.6%	569	37.4%

18 to 64 years old	9,900	2.2%	6,045	61.1%	3,855	38.9%
65 years old and over	1,486	0.3%	305	20.5%	1,181	79.5%
Other languages	6,291	1.4%	4,884	77.6%	1,407	22.4%
5 to 17 years old	730	0.2%	730	100.0%	0	0.0%
18 to 64 years old	4,637	1.0%	3,536	76.3%	1,101	23.7%
65 years old and over	924	0.2%	618	66.9%	306	33.1%
CITIZENS 18 YEARS AND OVER						
All citizens 18 years old and over	353,186	(X)	333,194	94.3%	19,992	5.7%
Speak only English	279,233	79.1%	(X)	(X)	(X)	(X)
Speak a language other than English	73,953	20.9%	53,961	73.0%	19,992	27.0%
Spanish	50,211	14.2%	37,147	74.0%	13,064	26.0%
Other languages	23,742	6.7%	16,814	70.8%	6,928	29.2%

	Seminole County, Florida		
	Total	Below poverty level	Percent below poverty level
Label	Estimate	Estimate	Estimate
Population for whom poverty status is determined	472,643	54,397	11.5%
AGE			
Under 18 years	95,051	11,222	11.8%
Under 5 years	22,145	1,622	7.3%
5 to 17 years	72,906	9,600	13.2%
Related children of householder under 18 years	94,717	10,888	11.5%
18 to 64 years	299,676	34,057	11.4%

18 to 34 years	106,327	17,799	16.7%
35 to 64 years	193,349	16,258	8.4%
60 years and over	106,538	11,586	10.9%
65 years and over	77,916	9,118	11.7%
SEX			
Male	232,018	23,391	10.1%
Female	240,625	31,006	12.9%
RACE AND HISPANIC OR LATINO ORIGIN			
White alone	280,559	25,435	9.1%
Black or African American alone	54,390	10,626	19.5%
American Indian and Alaska Native alone	N	N	N
Asian alone	27,601	3,609	13.1%
Native Hawaiian and Other Pacific Islander alone	N	N	N
Some other race alone	23,460	3,196	13.6%
Two or more races	85,444	10,971	12.8%
Hispanic or Latino origin (of any race)	112,883	15,425	13.7%
White alone, not Hispanic or Latino	260,018	21,524	8.3%
EDUCATIONAL ATTAINMENT			
Population 25 years and over	338,784	34,465	10.2%
Less than high school graduate	22,530	5,931	26.3%
High school graduate (includes equivalency)	73,788	9,308	12.6%
Some college, associate's degree	104,992	10,641	10.1%
Bachelor's degree or higher	137,474	8,585	6.2%
EMPLOYMENT STATUS			

Civilian labor force 16 years and over	263,992	18,022	6.8%
Employed	256,124	16,188	6.3%
Male	134,431	7,838	5.8%
Female	121,693	8,350	6.9%
Unemployed	7,868	1,834	23.3%
Male	5,050	1,008	20.0%
Female	2,818	826	29.3%
WORK EXPERIENCE			
Population 16 years and over	390,021	45,070	11.6%
Worked full-time, year-round in the past 12 months	189,728	4,675	2.5%
Worked part-time or part-year in the past 12 months	79,556	14,630	18.4%
Did not work	120,737	25,765	21.3%
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS			
50 percent of poverty level	28,071	(X)	(X)
125 percent of poverty level	68,954	(X)	(X)
150 percent of poverty level	82,758	(X)	(X)
185 percent of poverty level	103,546	(X)	(X)
200 percent of poverty level	119,496	(X)	(X)
300 percent of poverty level	192,541	(X)	(X)
400 percent of poverty level	258,379	(X)	(X)
500 percent of poverty level	313,776	(X)	(X)

UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	100,338	26,081	26.0%
Male	48,483	10,853	22.4%
Female	51,855	15,228	29.4%
15 years	0	0	-
16 to 17 years	334	334	100.0%
18 to 24 years	12,985	6,519	50.2%
25 to 34 years	24,650	5,995	24.3%
35 to 44 years	13,808	2,427	17.6%
45 to 54 years	11,249	1,732	15.4%
55 to 64 years	14,179	3,091	21.8%
65 to 74 years	12,030	3,095	25.7%
75 years and over	11,103	2,888	26.0%
Mean income deficit for unrelated individuals (dollars)	9,700	(X)	(X)
Worked full-time, year-round in the past 12 months	49,552	1,893	3.8%
Worked less than full-time, year-round in the past 12 months	21,059	9,586	45.5%
Did not work	29,727	14,602	49.1%
Population in housing units for whom poverty status is determined	471,410	53,582	11.4%

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Shani Beach

Phone: 407-585-4023

Address: 1200 Red Cleveland Blvd. Sanford, FL 32773

Discriminacion Illegal

Se prohíbe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento físico o discapacidad en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán ser dirigidas inmediatamente al Administrador del Aeropuerto o a:

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

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

Coordinador: Shani Beach



Sanford, U.S. Department of Transportation
Federal Aviation Administration

Teléfono: 407-585-4023

Dirección: 1200 Red Cleveland Blvd.
FL 32773

