

TITLE VI

DISCRIMINATION COMPLAINT GUIDELINES AND PROCEDURES

CRAA adopts the following discrimination complaint procedures for complaints alleging discrimination in airport services, programs, or activities, which are to be followed in filing a complaint. These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination.

- A. *Filing a discrimination complaint:* Any person who believes that he or she has been or is being subjected to discrimination on the basis of race, color, national origin, sex, or creed by the Airport, airport employees, tenants, vendors, or agents has the right to file a complaint. Any individual wishing to file a discrimination complaint must be given the option to file the complaint with CRAA, or directly with the Federal Aviation Administration's Office of Civil Rights. Complaints may be filed with both agencies simultaneously. Information on how to file a Title VI complaint is posted on CRAA's website and on public notices distributed across the airport properties. A Title VI complaint form may be obtained online, by contacting the Title VI Coordinator, Suzanne Bell, Sr. Attorney at Legal@ColumbusAirports.com or 614-239-5032. See **Attachment A, CRAA Title VI Complaint Form**, for an informational copy of the complaint form. If a complainant is unable to complete the complaint form in writing due to disability or limited-English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet or lack the ability to pick up a form, a complaint form can be mailed upon request.
- B. *Complaint filing timeframe:* A discrimination complaint must be filed by mail, online, in person or by telephone within one hundred eighty (180) calendar days of either:
1. The alleged act of discrimination.
 2. Date when the person(s) became aware of the alleged discrimination.
 3. Date on which the conduct was discontinued if there has been a continuing course of conduct.

CRAA or its designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing. The filing date is the date the person completes, signs, and submits the complaint form.

- C. *Contents of a complaint:* A discrimination complaint must be written. The document must contain the following information:
1. The complainant's name and address, or other means by which the complainant may be contacted.
 2. Identification of individual(s) or organization(s) responsible for the alleged discrimination.
 3. A description of the complainant's allegations, which must include enough detail to determine whether CRAA has jurisdiction over the complaint and if the complaint was filed timely.
 4. The specific prohibited base(s) of alleged discrimination (i.e., race, color, national origin, age, disability, sex, or creed).
 5. Apparent merit of the complaint.
 6. The complainant's signature or signature of his/her authorized representative.

In the event that a person makes a verbal complaint of discrimination to a CRAA officer or employee, the complainant shall be interviewed by the Title VI Coordinator and/or a representative from CRAA's legal department. If necessary, the Title VI Coordinator will assist the complainant in transcribing the complaint to writing and then submit the written version of the complaint to the person for signature.

- D. *Complaints*: Any complaints received against CRAA, our employees, tenants and concessionaires, will be forwarded to the Federal Aviation Administration for investigation. CRAA shall assign an impartial investigator to investigate any complaint in which it has been named in the complaint or in instances where the Title VI Coordinator cannot investigate. Depending upon the nature of the complaint and the parties involved the impartial investigator may be from CRAA's legal team or a third-party. The contact information for the FAA is:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591
Phone: (202) 267-3258

- E. *Notice of receipt*: All complaints shall be referred to CRAA's Title VI Coordinator for review and action. Within fifteen (15) days of receipt of the discrimination complaint, the Title VI Coordinator shall issue an initial written Notice of Receipt that:

1. Acknowledges receipt of the discrimination complaint.
2. Advises the complainant of the right to seek representation by an attorney or other individual of choice in the discrimination complaint process.
3. Contains a list of each issue raised in the discrimination complaint.
4. Advises the complainant of the timeframes for processing the discrimination complaint and providing a determination.
5. Advises the complainant of the right to also seek redress of the complaint directly with the FAA Office of Civil Rights.

- F. *Notification to the FAA of a complaint*: CRAA shall advise the FAA within fifteen (15) calendar days of receipt of the complaint. The notice will contain a copy of the original Title VI complaint filed with CRAA.

- G. *Processing a complaint and timeframe*: The Title VI Coordinator will receive, manage, and make a determination on all filed complaints. Investigations will generally be completed within forty-five (45) days from receipt of a completed complaint form. If more information is needed to resolve a complaint, the Title VI Coordinator may contact the complainant and request more information. If the requested information is not received within fifteen (15) calendar days from the date of the request, the Title VI Coordinator may administratively close the complaint. A complaint may also be administratively closed if the complainant no longer wishes to pursue the case.

- H. *Notice of Final Action*: After the Title VI Coordinator reviews the complaint and completes the investigation, he or she will provide a Notice of Final Action to the complainant. The Notice will include:

1. A statement regarding the disposition of each issue identified in the discrimination complaint and reason for the determination; and
2. An explanation of any corrective action taken.
3. If the Title VI Coordinator's final response does not satisfactorily resolve the matter, the complainant and/or authorized representative may appeal to CRAA's President & CEO, 4600 International Gateway, Columbus, Ohio 43219. The complainant should file a written appeal, including a detailed description of its basis, within thirty (30) calendar days after the date of the Title VI Coordinator's final response. Within thirty (30) calendar days after receiving an appeal, CRAA's CEO or designee ("the Appeals Officer"), shall attempt to contact the complainant to discuss the matter and possible resolution. Within forty-five (45) calendar days after the filing of the appeal, the Appeals Officer will provide a final written resolution of the complaint.

CRAA's Title VI Coordinator shall provide the FAA Office of Civil Rights with a copy of the final decision, as well as a summary of findings upon completion of the investigation. Should deficiencies be noted in the implementation of these discrimination complaint procedures by CRAA, the FAA's Title VI Program Coordinator will work in conjunction with CRAA's Title VI Coordinator to review the information and/or provide technical assistance in the discrimination complaint process and/or investigation.

- I. *Recordkeeping*: The Title VI Coordinator shall maintain a log of complaints filed that allege discrimination. The log must include:
 1. The name and address of the complainant.
 2. Basis of discrimination complaint.
 3. Description of complaint.
 4. Date filed.
 5. Disposition and date.
 6. Appeals and resolutions.
 7. All correspondence, as well as any other pertinent information.

All records regarding discrimination complaints and actions taken on discrimination complaints shall be maintained for a period of not less than five (5) years from the final date of resolution of the complaint.

CRAA's Title VI Policy Statement, Program, and Complaint Procedure are available upon request from CRAA's Title VI Coordinator via email Legal@ColumbusAirports.com or in hard copy at CRAA's Administration Offices located at 4600 International Gateway, Columbus, Ohio 43219. Upon request, it may also be made available in alternate formats by contacting the Title VI Coordinator as directed above.