Civil Rights–Title VI
Nondiscrimination Training
Meet the Indianapolis Airport Authority’s Title VI Civil Rights Coordinator:

Holli Harrington
Title VI Coordinator

” We make every effort to ensure passengers, personnel, and visitors are met with respect and feel welcomed at our airport. “

HOLLI HARRINGTON
Title VI of the Civil Rights Act of 1964 prohibits discrimination under any program or activity receiving Federal Financial Assistance. The Indianapolis Airport Authority (IAA) receives funding from the Federal Aviation Administration (FAA) and is required to comply with Civil Rights laws and regulations.

• The Title VI nondiscrimination regulations and obligations apply to IAA’s:
  – Employees
  – Tenants
  – Concessionaires
  – Lessees
  – Contractors
  – Fixed based operators

• Discrimination is prohibited at IAA.

• IAA has a process for reporting discrimination.
The purpose of Title VI training is:

• To safeguard against discrimination at IAA. It is important for you to know what discrimination is and how to report and assist should discrimination occur.

• To be certain that all IAA employees, tenants, concessionaires, lessees, contractors and fixed based operators are aware of the provisions of Title VI of the Civil Rights Act of 1964 and what it takes to comply.

• In the event of discrimination, WE WANT YOU TO KNOW WHAT TO DO.

Discrimination is unfair treatment based on the grounds of:

• Race, color or national origin
• Sex and creed
• Age
Under Title VI federal laws, airports are required to take affirmative action to ensure that there is nondiscrimination in all of their operations.

**Title VI of the Civil Rights Act of 1964, as Amended (42 U.S.C.2000d)**
Prohibits discrimination on the grounds of race, color or national origin. “Civil Rights” are the rights of individuals to receive equal treatment (and to be free from unfair treatment or “discrimination”) in a number of settings, including education, employment, housing, and more, and based on certain legally-protected characteristics.

**49 Code of Federal Regulations (CFR) Part 21**
No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation.

**Additional Federal Regulations and Operating Requirements per the United States Code (U.S.C.)**
49 U.S.C. 47123 further prohibits recipients of FAA financial assistance from engaging in discrimination based on sex and creed; the Age Discrimination Act of 1975, as amended (42 U.S.C. Section 6101et seq.) prohibits discrimination against FAA program beneficiaries on the grounds of age.
Title VI regulations are clear about what is prohibited, and applies to all IAA employees, tenants, concessionaires, lessees, contractors and fixed based operators.

- Denying any individual *services, opportunities, or other benefits* for which that individual is otherwise qualified;

- Discrimination against a Limited English Proficient individual, one who has *limited ability to read, speak, write or understand English* per Executive Order 13166 — improving access to services for persons with Limited English Proficiency;

- Providing a different service, aid or benefit, or providing them in a *manner different* than they are provided to others;

- Addressing an individual *in a manner that denotes inferiority* because of *race, color, national origin, sex, creed or age*;

- Any actions that bear an unreasonable or *disproportionate burden* on a low income or minority population per Executive Order 12898 — actions to address Environmental Justice.
IAA is obligated to comply by taking affirmative action to ensure nondiscrimination in any of its operations, including but not limited to:

- **Services provided** by our employees, tenants, concessionaires, lessees, contractors and fixed based operators;

- **Ensuring all procurement documents and contracts** include a clause regarding 49 CFR Part 21 and nondiscrimination obligations;

- **Reporting discrimination complaints to FAA.** All discrimination complaints are taken seriously and reviewed thoroughly by IAA;

- **Informing employees and the public** of their rights under Title VI. The following are resources available to employees and the public:

  - UNLAWFUL DISCRIMINATION POSTER
  - CIVIL RIGHTS WEBSITE
  - PROCEDURE FOR FILING A COMPLAINT OF DISCRIMINATION
Your obligations to comply with Title VI regulations include:

- **Understanding your responsibilities** as it refers to your role:
  - Abide by the laws.
  - Do not discriminate.
  - Assist individuals with limited ability to read, speak, write or understand English.
  - Include nondiscrimination language in contracts.
  - Promptly report allegations of discrimination. Allegations of discrimination should be filed using the Title VI complaint form found online at ind.com/civil-rights and at IAA Guest Services.

- All discrimination complaints are **taken seriously and reviewed thoroughly** by IAA.

**FOR MORE INFORMATION OR QUESTIONS ABOUT TITLE VI:**

- Refer to section 102 of IAA’s employee handbook, “Freedom from Discrimination, Harassment and Other Inappropriate Conduct”;
- Refer to IAA’s Civil Rights website;
- Contact your supervisor.
WHAT ARE THE SANCTIONS FOR NONCOMPLIANCE?

**Federal Aviation Administration sanctions for noncompliance include:**

- **Withholding payments** to the recipient under the contract/grant until the recipient complies.

  AND / OR

- **Cancellation, termination or suspension** of the contract/grant, in whole or in part.

IAA receives **$15 million on average** in grant federal funding annually from the Federal Aviation Administration (FAA).
We need each of you to ensure passengers, personnel and visitors have a **ONE OF A KIND** experience.

Complaint procedures and forms are available at IAA Guest Services and online at: [ind.com/civil-rights](http://ind.com/civil-rights)
To comply:

**Be aware** of Title VI Nondiscrimination requirements.

**Complete the Title VI Nondiscrimination training** and test your knowledge.

**Report Title VI Nondiscrimination violations** immediately per procedure at: ind.com/civil-rights