

Title VI Plan



Approved by:

Grant W. Sussey

Director of Aviation



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Introduction

Watertown International Airport is a recipient of Federal funds from the United States Department of Transportation modal agencies which includes the Federal Aviation Administration. All recipients of federal funding must comply with the requirements of Title IV of the Civil Rights Act of 1964 and other nondiscrimination statutes, regulations and authorities. The Title VI Plan (Plan) describes how Watertown International Airport effectuates nondiscrimination in the delivery of its federally assisted programs, services and activities. The Plan includes the staffing structure for Watertown International Airport’s Title VI Nondiscrimination program as well as the policies, procedures and practices Jefferson County has in place to comply with Federal nondiscrimination requirements. The Plan is regularly monitored and updated to reflect the growth and changes of Watertown International Airport’s Title VI Nondiscrimination program as it changes and grows. Anyone wishing to provide input into Watertown International Airport’s Title VI program or activities is encouraged to contact Watertown International Airport’s Title VI Coordinator by calling (315) 786-6001, emailing airport@co.jefferson.ny.us, or by writing to 22529 Airport Drive, Dexter, NY 13634

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21).



The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include:

Title VI of the Civil Rights Act of 1964; 42 USC 2000d to 2000d-4; 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3; EO 13166.



1. Title VI Policy Statement¹

Watertown International Airport 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.

Watertown International Airport 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. Anytime communities may be impacted by programs or activities every effort will be made to involve their leaders and general public in the decision-making process. Awards of contracting, concessionaires, and leases are made without regard for race, color, national origin, sex, or creed. Watertown International Airport 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 **Watertown International Airport** will take action to involve them and the general public in the decision making process.

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

Grant W. Sussey is responsible for overseeing the Watertown International Airports 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

Director of Aviation

Effective Date

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 Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other required responsibilities. 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 Watertown International Airport or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Watertown International Airport and Jefferson County and resubmittal to FAA.

In addition, the following programs maintain a Title VI liaison responsible for coordinating Title VI information, data, and notices related to the program.

Staff Supporting Title VI Program	Watertown International Airport Program
<i>Grant Sussey</i>	<i>Airport Manager DOA</i>
<i>Shawn Herrmann</i>	<i>Assistant Manager Deputy DOA</i>

As of the date of this plan, **Watertown International Airport** maintains a of list current applications for federal financial assistance outlined in the Watertown Capital Improvement Program (ACIP)

3. Grant and Procurement Assurances

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

Watertown International Airport 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.

Watertown International Airport requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. Furthermore, Watertown International Airport requires this provision to be included in all subcontracts, subleases, and other agreements at any tier.



4. Title VI Coordinator Responsibilities

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

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

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

Among other responsibilities, the Coordinator:

- Proactively ensures that the Watertown International Airport is in compliance with nondiscrimination requirements of Title VI and reports to **Watertown International Airport** 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 Watertown International Airport's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints



Sections of this Plan.

The Coordinator has not requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>). **Watertown International Airport or Jefferson County** will request access for the coordinator.

5. Notice

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

We 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.

Watertown International Airport Jefferson County has posted the above Title VI policy statement at its staff offices.

Watertown International Airport has distributed this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan “will be” distributed by (3/31/2024) by email and at tenants 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
<i>Watertown International Terminal</i>	<i>1</i>	<i>1</i>
<i>FBO Airport Administration</i>	<i>1</i>	<i>0</i>
<i>ARFF Airport Rescue & Fire Fighting</i>	<i>1</i>	<i>0</i>

Outreach to Affected Communities

Our office ensures that required notices of public hearings and opportunities to comment on proposed airport actions reach all segments of the impacted community. Such notices are announced over general and minority newspapers and broadcast media, where appropriate. Our office will all contact leaders in affected communities directly and solicit their participation. The office maintains records of all such notices and the efforts made to reach the affected community or communities.

To ensure that the community effectively informed of and able to participate in public hearings, our Airport or County Administration Offices advertises public notices in appropriate languages when a significant number or proportion of the affected community has limited English proficiency. Such notices will include directions for obtaining an interpreter free of charge for the public hearing. 28 CFR § 42.405(d).

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



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 **Watertown International Airport** will be able to identify, understand, and engage with communities. In doing so, the **Airport** needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by the airport program.

Several regulations relating to Title VI of the Civil Rights Act of 1964 require federal grant recipients to know the community demographics. Our community has a total population of 116,721 and of that number, 80.8% are white, 8.1% black or African American, 1.7% Asian, 7.4.1% two or more races, and 7.8% Hispanic/Latino, according to the U.S. Census Bureau (<https://www.census.gov/quickfacts/watertowncitynewyork>) We have identified the following facts about the community composed of these 5 counties

Low Income Communities: A low income area is an identifiable group of people living in geographic proximity to those whose median household income is at or below the Department of Health and Human Services poverty guidelines. According to the 2021 U.S Census Bureau Report, 20.8% of residents in Watertown, NY are at or below the poverty line.

Minority Communities: Jefferson County is the county in which Watertown International Airport is located. The minority communities that fall within the county that make up the entire population are as follows: African American (6.7%), Hispanic (8%), Asian (1.52%), and Native American (0.7%). The total percentage of the combined communities is (15.19%) in Jefferson County.

Limited English Proficiency: The following languages are the top 5, in descending order, spoken in homes as their primary language/individuals that “do not speak English proficiently” in the state of New York “People Who Speak a Language Other Than English at Home” 30.6 percent (source: 2022 U.S. Census)

State Overall 5 County Combination

1. Spanish
2. Chinese
3. Russian
4. Italian
5. French

Airport Language Line Usage reported as a percentage of calls received by the airport

(Source: 2023 Language Access Annual Progress Report)

Spanish	33.5%
Japanese	17.5%
Mandarin	9.3%



French 6.1%
Korean 4.5%

The above 5 languages represent 70.6% of all calls.

Top 5 Non-English Languages in New York State public schools

(2022 State Report on Educating LEP Students)

Language	%of Students	%of ESL Students
1. Spanish	6%	65%
2. Chinese	1%	10%
3. Arabic	0.8%	5%
4. Bengali	0.6%	3%
5. Russian	0.4%	2%

This information is updated annually through the following resources:

1. U.S. Census Bureau
2. State Superintendent of Public Instruction Data
3. County Housing Authority Data
4. Community Centers and Tribal Offices
5. Public Health Department
6. State Demographics Agency



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



8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the **Watertown International** 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

1. Spanish
2. Chinese
3. Russian
4. Italian
5. French

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 **Watertown International Airport** 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:
- Language Line Solutions
 - a. *The airport contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used:*
 - i. *Dial 866-874-3972*
 - ii. *Provide Client(Request at Service Desk)*
 - iii. *Select Language*
 1. *Press 1 for Spanish*
 2. *Press 2 for all other languages.*
 3. *Press 0 for assistance if you don't know the language*
 - iv. *Enter 4-digit access code (Request at Service Desk)*



9. Transportation

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

In the community statistics of this plan, we identified the following disadvantaged area of nearby communities: Hispanic, African American, and Asian American.

The Planning priorities will be to focus on completing the Metropolitan Planning Organization MPO three active planning studies. Additionally, the MPO will progress a new study to look at the need for improved bicycle and pedestrian linkages near schools and a limited number of other key areas as discussed in the 2045 MPO Long Range Transportation Plan (LRTP). Their website is www.wjctc.org. The airport also coordinates with Jefferson County Planning Department regarding the creation of fixed routes that will someday soon connect the airport to various locations throughout the County. At a minimum, connections are proposed for our most disadvantaged populations including city of Watertown residents and soldiers and their families residing on Ft Drum. The County-wide public transportation system is expected to go online in the summer 2025.

10. Minority Businesses

49 CFR 21 Appendix C (a)(1)(x)

Bids for airport concessions are solicited from area minority businesses through the following avenues: local minority and general newspapers, trade journals, and a professional services directory, etc. Some of the bid notification sources include: **Watertown Daily Times and Thousand Island Sun**.

The concession award process is not based on race, color, national origin, sex, or creed. Information on the award process and documentation for specific bid decisions is kept with the **Jefferson County Purchasing Office at 195 Arsenal St Watertown, NY, 13601**

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



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 requirements³
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements⁴

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, **Watertown International Airport** 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 matters⁵
3. Allege misconduct by the **Watertown International Airport** including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the **Watertown International Airport** including airport employees, contractors, concessionaires, lessees, or tenants.

³ 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.

⁴ 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.

⁵ Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.



Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the **Watertown International Airport**. 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 Airport Staff and/ or Tenants.

Complaints must be filed within 90 days of the discriminatory event, must be in writing, and must be delivered to:

Grant Sussey Watertown International Airport Director
FBO/Business Center
22564 Airport Drive
Dexter, NY, 13634

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 **48 hours**.

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 information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.



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 Watertown International, 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. Watertown International 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.

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 airport's conclusion regarding whether unlawful discrimination occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA.

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 **Jefferson County Legislator**
- The written appeal must be received **within 10** business days after receipt of the written decision.
- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.



- The Airport 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, **Watertown International Airport** will identify and implement measures to reduce the chances of similar discrimination in the future.

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

For information on filing a complaint with DOT/FAA, please contact Airport Director of Aviation **Grant Sussey (DOA)**

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



Title VI Discrimination Complaint Form

Name _____

Address _____ City _____ Zip _____

Telephone: Home _____ Work _____ Cell _____

Basis of Complaint

Race _____ National Origin _____

Color _____ Disability (ADA) _____

Sex _____ Age _____

Low-Income (Y / N)

Who allegedly discriminated against you?

Name _____ Address _____

City _____ Zip _____ Telephone _____

If an organization, what is its name?

Name of Organization _____

Address _____ City _____ Zip _____

Telephone _____

Name of Contact _____

How were you discriminated against?



Where did the alleged discrimination occur?

Date/s and times discrimination occurred?

First time _____ Second

time _____ Third

time _____ Were there any other witnesses to the
discrimination?

Name	Title	WorkTelephone	HomeTelephone
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What can the Department to do to resolve the complaint?

Have you filed your complaint with anyone else?

Who _____ When

_____ Complaint number, if known

_____ Do you have an Attorney in this matter?

Name _____

Address _____ City _____ Zip _____

Signed _____ Date