

**City of Manchester Department of Aviation,  
Manchester-Boston Regional Airport  
Title VI Plan**

**1. Title VI Policy Statement<sup>1</sup>**

The City of Manchester Department of Aviation (Department of Aviation) 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.

The Department of Aviation 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 Department of Aviation agrees, among other things, to understand the communities surrounding or in the flight path of, as well as customers that use, Manchester-Boston Regional Airport (MHT or the Airport). Any time communities may be impacted by programs or activities, the Department of Aviation will take action to involve them and the general public in the decision-making process.

The Department of Aviation requires nondiscrimination assurances, as prescribed by the Federal Aviation Administration (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 Department of Aviation and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and subcontractors.

Mr. Wayne Robinson is available at (603) 624-6539 and [wrobinson@flymanchester.com](mailto:wrobinson@flymanchester.com), and is responsible for overseeing MHT’s compliance with Title VI and serving as the point of contact for all Airport Title VI matters and related responsibilities, including those required by Title 49 Code of Federal Regulations (CFR) Part 21.



*Signature*

Theodore S. Kitchens, A.A.E.  
Airport Director

December 29, 2023

**Effective Date**

December 29, 2026

**3-Year Expiration Date**

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

## **2. Administration**

The Airport Director has reviewed and adopted this Title VI Plan for MHT. 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 Director or Coordinator’s name. Significant revisions to MHT’s policies or federal guidelines may warrant re-adoption by the Airport Director and resubmittal to the FAA.

In addition to the Coordinator and Department of Aviation’s leadership, the following people also assist with our Title VI Plan requirements:

<b>Staff Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
Thomas J. Malafrente, A.A.E.	Deputy Airport Director
Jenna Dakalovic, Esq.	Assistant Director for Properties and Contracts

The Department of Aviation has the following airport program sub-recipients: none

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

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
Airport Improvement Program (AIP) Entitlement - Escalator Replacements	Grant number is not assigned until awarded	\$3,600,000
AIP Discretionary - ARFF Truck Replacement	Grant number is not assigned until awarded	\$1,090,000
AIP Entitlement/Discretionary - Electric Vault Replacement	Grant number is not assigned until awarded	\$4,500,000
BIL Airport Terminal Program (ATP) - Terminal – Air Handling and Rooftop Unit replacements	Grant number is not assigned until awarded	\$6,512,000
AIP Entitlement/Discretionary – North Cargo Ramp Snowmelter	Grant number is not assigned until awarded	\$1,090,000
AIP Entitlement/Discretionary – Reconstruct a Portion of Taxiway H (Design Only)	Grant number is not assigned until awarded	\$450,000

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

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
FAA AIP	<a href="https://www.faa.gov/airports/aip/">https://www.faa.gov/airports/aip/</a>
BIL ATP	<a href="https://www.faa.gov/newsroom/bipartisan-infrastructure-law-airport-terminal-program-grants-file">https://www.faa.gov/newsroom/bipartisan-infrastructure-law-airport-terminal-program-grants-file</a>
BIL AIG	<a href="https://www.faa.gov/general/bipartisan-infrastructure-law-airport-infrastructure-grant-funding-amounts">https://www.faa.gov/general/bipartisan-infrastructure-law-airport-infrastructure-grant-funding-amounts</a>

### 3. Grant and Procurement Assurances

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

The Department of Aviation will complete standard grant assurances for Title VI and related requirements, in the form prescribed by the FAA. See [https://www.faa.gov/airports/aip/grant\\_assurances/#current-assurances](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 the FAA. See [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](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 Department of Aviation requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. The following clause is required to be included:

*MHT, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 USC §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders or offerors that it will affirmatively ensure that for any contract entered into pursuant to this advertisement, [select businesses, or disadvantaged business enterprises or airport concession disadvantaged business enterprises] will be afforded full and fair opportunity to submit bids in response to this invitation and no businesses will be discriminated against on the grounds of race, color, national origin (including limited English proficiency), creed, sex (including sexual orientation and gender identity), or age in consideration for an award.*

#### **Description of Oversight Methods for Subcontracts**

- Obligatory provisions and references are inserted into base templates which are reviewed periodically by the Airport Properties and Contracts Business Unit to ensure accordance and consistency with Sponsor Assurances. Periodic performance audits will be conducted to ensure compliance; approximately 10 percent of all Airport contracts will be randomly sampled, along with their associated Airport subcontracts, and reviewed to determine if they include required Civil Rights clauses.

#### 4. **Title VI Coordinator Responsibilities**

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

- 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 **Section 11** for more information on expected training for all staff. Among other responsibilities, the Coordinator:

- Proactively ensures that the Department of Aviation is in compliance with nondiscrimination requirements of Title VI and reports to Department of Aviation leadership on the status of Title VI compliance.
- Responds promptly to requests by the 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 Department of Aviation'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 the following: Airport customer satisfaction surveys, customer complaints, Airport event sign-in sheets, and bids/proposals for Airport contracts, as well as 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 **Section 12** regarding compliance reviews, audits, complaints, lawsuits, and other investigations.

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)

The Department of Aviation will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on Airport property, including those with pedestrian activity and at its staff offices. The Coordinator ensures these posters are visible, accessible,<sup>2</sup> and maintained. These posters are provided in English and Spanish. The poster template is available at:[https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/com\\_civ\\_support/non\\_disc\\_pr/](https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/) and a completed copy is attached as **Appendix A**.

Unlawful Discrimination Posters are conspicuously displayed in multiple locations at the Airport: Airport Administration Offices, Airport Operations Building, Baggage Claim, Communications Center, Fixed Based Operators (FBO), Rental Car Facility, Terminal, and Ticketing.

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>
Airport Administration Offices	2	
Airport Operations Building	5	
Baggage Claim	5	
Communications Center	1	
FBO	2	
Rental Car Facility	1	
Terminal	7	9
Ticketing	4	

The Department of Aviation will distribute this Title VI Plan among its employees and Airport contractors, concessionaires, lessees, and tenants upon approval by the FAA. This plan will be referenced in upcoming contract documents and included in future AIP project contracts. Title VI compliance will be certified for contractors at pre-bid or RFP meetings. For Airport employees, concessionaires, lessees and tenants, the plan will be distributed and certified along with other federally mandated certifications during the security badging process. On an annual basis, the plan will be emailed to all current Department of Aviation employees and referenced at the monthly tenant manager meeting. This plan will also be available via MHT's website at: <https://www.flymanchester.com/public-documents-and-plans/>.

### Outreach to Affected Communities

The Public Information Officer ensures that notices for public meetings reach all segments of the impacted community. The Airport's communications team will identify the effective media platforms to share announcements and notices, such as social media pages, general circulation newspapers, and community newspapers. The Public Information Officer contacts leaders and

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<sup>2</sup> For more information about website accessibility, please visit [ADA.gov](http://ADA.gov).

representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> 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.

Detailed information on our public notice and outreach procedures will be available in the Department of Aviation Community Participation Plan (CPP), upon approval by the FAA. At that time, a copy of the CPP will be available via <https://www.flymanchester.com/public-documents-and-plans/> or Title VI Coordinator, and a copy of the approved CPP will be attached to this Title VI Plan.

To ensure that the community is effectively informed of and able to participate in public hearings, the Department of Aviation includes public notices translated into appropriate languages, including 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 directions for obtaining an interpreter, free of charge, for public hearings, per 28 CFR § 42.405(d). See Section 8 (Limited English Proficiency).

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<sup>3</sup> 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.

## 6. Community Statistics

Title VI regulations require federal grant recipients to identify their community demographics (49 CFR § 21.9[b]). The Department of Aviation seeks to understand communities that are eligible to be served, actually or potentially affected, and/or benefited or burdened by the Airport’s activities, programs, and services. By understanding community demographic information, the Department of Aviation can identify, understand, and appropriately engage with the communities surrounding MHT. The profiles contained herein can be used to evaluate and assess whether identified low-income, minority, LEP, or ethnically diverse populations could potentially bear disproportionately high and adverse impacts from a future proposed Airport project(s).

The U.S. Census Tracts that intersect with the Airport’s 2018 Day-Night Average Sound Level (DNL) 65 decibels<sup>4</sup> (dBA) noise exposure contour are determined to experience potential direct effects (areas that would be physically disturbed) and indirect effects (areas that could experience air quality, noise, traffic, or visual effects) of a proposed Airport project. As such, these communities will be referred to collectively as “the Affected Communities.”

Affected Communities <sup>5</sup>	Population
Census Tract 26	5,319
Census Tract 29.01	8,213
Census Tract 9801.01 (Airport Tract)	0 <sup>6</sup>
Census Tract 37.03	5,627
Census Tract 9800.11 (Airport Tract)	0 <sup>7</sup>

Within MHT’s Affected Communities, Environmental Justice Communities of Concern are found to exist if:

1. the minority population exceeds 50 percent, or
2. the minority population percentage is meaningfully greater (at least 10 percentage points greater) than adjacent geographical units (MHT’s Surrounding Communities<sup>8</sup>), or
3. there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

Through these metrics, MHT has been found to have no Environmental Justice Communities of Concern.

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<sup>4</sup>Decibels are measured on the A-weighted scale.

<sup>5</sup>“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.

<sup>6</sup>Denotes an airport census tract and has a population of zero.

<sup>7</sup>Denotes an airport census tract and has a population of zero.

<sup>8</sup> MHT’s Surrounding Communities is a reference community utilized for comparison with the Affected Community, which is made up of selected US Census Tracts within Hillsborough and Rockingham Counties that intersect the 2018 DNL 65 dBA noise exposure contours. This reference area includes 20 tracts surrounding the airport.

The following details have been identified about the Airport’s Affected Communities.

**Low-Income Communities.**<sup>9</sup>

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the U.S. 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,” the Department of Aviation is collecting information about affected and potentially affected low-income communities. According to *U.S. Census Report, S1701: Poverty Status in the Past 12 Months*, the overall poverty level for the Airport’s Surrounding Community is approximately 5.6 percent. The poverty rate remains similar compared with the rest of the Airport’s Primary Service Area (Hillsborough, Merrimack, and Rockingham Counties). The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate (%)
Census Tract 26	2
Census Tract 29.01	4
Census Tract 9801.01 (Airport Tract)	0 <sup>10</sup>
Census Tract 37.03	1
Census Tract 9800.11 (Airport Tract)	0 <sup>11</sup>

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<sup>9</sup> Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, these data will be utilized in our CPP to help ensure the meaningful involvement of low-income communities in Airport programs and activities.

<sup>10</sup> Denotes an airport census tract and has a population of zero.

<sup>11</sup> Denotes an airport census tract and has a population of zero.



**Racial and Ethnic Communities.**

U.S. Census Bureau demographic data were evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race and ethnicity for the Airport’s Affected Communities is as follows:

**Affected Community: Census Tract 26**  
**Total Affected Community Population: 5,319**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	5,085	96%
Black or African American	60	1%
American Indian or Alaska Native	0	0%
Asian	59	1%
Native Hawaiian or Other Pacific Islander	0	0%
More Than One	100	2%
Some Other Race Alone	15	<1%
No Response / Would Not Say	0	0%

<b>Demographic Group Within Affected Community</b>	<b>Number of Hispanic or Latino and Non-Hispanic or Latino Population</b>	<b>Percent of Total Affected Community Population</b>
Hispanic or Latino	311	6%
Not Hispanic or Latino	5,008	94%

**Affected Community: Census Tract 29.01**  
**Total Affected Community Population: 8,213**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	7,290	89%
Black or African American	45	1%
American Indian or Alaska Native	0	0%
Asian	543	7%
Native Hawaiian or Other Pacific Islander	0	0%
More Than One	280	3%
Some Other Race Alone	55	1%
No Response / Would Not Say	0	0%

<b>Demographic Group Within Affected Community</b>	<b>Number of Hispanic or Latino and Non-Hispanic or Latino Population</b>	<b>Percent of Total Affected Community Population</b>
Hispanic or Latino	364	4%
Not Hispanic or Latino	7,849	96%

**Affected Community: Census Tract 9801.01 (Airport Tract)**

**Total Affected Community Population: 0**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	0	0%
Black or African American	0	0%
American Indian or Alaska Native	0	0%
Asian	0	0%
Native Hawaiian or Other Pacific Islander	0	0%
More Than One	0	0%
Some Other Race Alone	0	0%
No Response / Would Not Say	0	0%

<b>Demographic Group Within Affected Community</b>	<b>Number of Hispanic or Latino and Non-Hispanic or Latino Population</b>	<b>Percent of Total Affected Community Population</b>
Hispanic or Latino	0	0%
Not Hispanic or Latino	0	0%

**Affected Community: Census Tract 37.03**  
**Total Affected Community Population: 5,627**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	5,124	91%
Black or African American	93	2%
American Indian or Alaska Native	19	0%
Asian	215	4%
Native Hawaiian or Other Pacific Islander	0	0%
More Than One	176	3%
Some Other Race Alone	0	0%
No Response / Would Not Say	0	0%

<b>Demographic Group Within Affected Community</b>	<b>Number of Hispanic or Latino and Non-Hispanic or Latino Population</b>	<b>Percent of Total Affected Community Population</b>
Hispanic or Latino	132	2%
Not Hispanic or Latino	5,495	98%

**Affected Community: Census Tract 9800.11 (Airport Tract)**  
**Total Affected Community Population: 0**

<b>Demographic Group within Affected Community</b>	<b>Number of People in Minority Group</b>	<b>Percent of Total Affected Community Population</b>
White	0	0%
Black or African American	0	0%
American Indian or Alaska Native	0	0%
Asian	0	0%
Native Hawaiian or Other Pacific Islander	0	0%
More Than One	0	0%
Some Other Race Alone	0	0%
No Response / Would Not Say	0	0%

<b>Demographic Group Within Affected Community</b>	<b>Number of Hispanic or Latino and Non-Hispanic or Latino Population</b>	<b>Percent of Total Affected Community Population</b>
Hispanic or Latino	0	0%
Not Hispanic or Latino	0	0%

**Limited English Proficiency.**

The goal of all language access planning and implementation is to ensure that the Department of Aviation communicates effectively with LEP individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>12</sup> that are spoken in LEP households in the Affected Communities that meet the safe harbor threshold. The data source is American Community Survey, Table B16001, “Language Spoken at Home by Ability to Speak English.”<sup>13</sup>

The threshold we have used for identifying the languages with significant LEP populations is the safe harbor threshold in the DOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons”, which is 5 percent or 1,000, whichever is less.<sup>14</sup> The safe harbor for MHT’s community is 958 (or 5% of the total Affected Community population). Please refer to **Appendix B** for data on all languages in our community.

<b>Languages Spoken by LEP Population that Meet the Safe Harbor Threshold</b>	<b>Number</b>	<b>Margin of Error</b>
<i>None</i>	-	-

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages):

<b>Languages Spoken by LEP Persons</b>	<b>A few times a year (12 or less days a year)</b>	<b>Several times a month (13 to 51 days a year)</b>	<b>At least once a week (52 to 364 days a year)</b>	<b>Every day (365 days a year)</b>
Spanish			X	
French		X		

NOTE: Frequency of each language encountered are based on Ricondo & Associates, Inc.’s analysis of US Department of Transportation and Sabre CY 2022 enplanement data

Sources: US Census Bureau, 2022 American Community Survey 1-Year Estimates, (Table B01003), accessed December 2023; US Census Bureau, 2015 American Community Survey 5-Year Estimates, (Table B16001), accessed December 2023; US DB1b Survey and Form T-100 accessed December 2023; Sabre accessed December 2023; Ricondo & Associates, Inc., December 2023 (analysis)

<sup>12</sup> It is recommended that language groups from the U.S. Census are used, and data are used for the “Speak English less than ‘very well’” category for each language over the threshold.

<sup>13</sup> US Census Bureau, 2022 American Community Survey 1-Year Estimates, Table B01003, “Total Population,” <https://data.census.gov/table?q=B01003> (accessed December 2023); US Census Bureau, 2015 American Community Survey 5-Year Estimates, Table B16001, “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over,” <https://data.census.gov/table?q=B16001> (accessed December 2023); 2015 census data are the most current U.S. Census Bureau data for the Affected Communities. There is limited availability for Community Survey data for the years 2016 through 2022.

<sup>14</sup> See the DOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” at <https://www.transportation.gov/civil-rights/civil-rights-library/policy-guidance-concerning-recipients-responsibilities-limited> and <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, they provide a consistent starting point for identifying significant LEP populations.

Additional languages spoken by LEP persons within the Southern New Hampshire Planning Commission's geographic area are Spanish, French, and other Indo-European Languages. The languages within the New Hampshire Department of Transportation Title VI Implementation Plan (Spanish, French, and Chinese) are within the languages spoken by LEP persons at MHT.

<b>Other Indo-European Languages</b>
French (incl. Cajun)
Haitian
Italian
Portuguese
German
Yiddish, Pennsylvania Dutch, or other West Germanic languages
Greek
Russian
Polish
Serbo-Croatian
Ukrainian or other Slavic languages
Armenian
Persian (incl. Farsi, Dari)
Gujarati
Hindi
Urdu
Punjabi
Bengali
Nepali, Marathi, or other Indic languages
Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish
Telugu
Tamil
Malayalam, Kannada, or other Dravidian languages

This demographic information is updated annually<sup>15</sup> through checking the following resources:

<b>Data Sources for Languages Spoken in Affected Community</b>	<b>Website link to Data Source</b>
U.S. Census Bureau	<a href="https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001">https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001</a>
Southern New Hampshire Planning Commission	<a href="https://www.snhpc.org/sites/g/files/vyhlf5006/f/uploads/snhpctitleviprogram_2023update_adopted.pdf">https://www.snhpc.org/sites/g/files/vyhlf5006/f/uploads/snhpctitleviprogram_2023update_adopted.pdf</a>
New Hampshire Department of Transportation	<a href="https://mm.nh.gov/files/uploads/dot/remote-docs/title-vi-implementation-plan.pdf">https://mm.nh.gov/files/uploads/dot/remote-docs/title-vi-implementation-plan.pdf</a>

Beneficiary Diversity.

Demographic information will be 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 Airport will require that all non-federal contracts align with the same methodology used in the collection of information as required by federal contracts.
- Sign-in sheets will request voluntary demographic information from attendees.
- The Airport will invite all firms and organizations, regardless of DBE certification, to attend a teleconference to review its 49 CFR Part 26 minimum Disadvantaged Business Enterprise (DBE) participation goal, calculation methodology, the effects of discrimination on opportunities for minority firms to perform work at the Airport and will answer any public questions/concerns on an annual basis.
- Under 49 CFR Parts 23 and 26, the New Hampshire Department of Transportation certifies Disadvantaged Business Enterprises (DBEs) and Airport Concessions Disadvantaged Business Enterprises (ACDBEs) and the Airport monitors their participation and payment on Department of Aviation projects with DBE and ACDBE goals. Since these federal programs are race and gender neutral and were created to level the playing field for socially and economically disadvantaged groups that have historically been excluded from participating in federal procurement, when these firms are certified, their minority status, gender, and company information is uploaded to the New Hampshire Unified Certification Program (UCP) DBE Directory.
- Marketing and Public Relations will conduct biannual surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey will include a voluntary request for demographic information.

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<sup>15</sup> Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during its 3-year period.

- Participants at small business workshops, pre-bid meetings, and other public meetings will be asked to complete an anonymous survey that includes demographic information.
- Businesses that submit bids or offers will be asked to complete an anonymous survey that includes demographic information, submitted through a data collection website.

Staff and Advisory Board Diversity.

Demographic information is collected from Airport employees and members of planning and advisory boards, through voluntary disclosures.

- Employees are asked to submit voluntary confidential demographic information at time of hiring.

## **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 Department of Aviation activity can 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, and legitimate nondiscriminatory justification, as 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.<sup>16</sup>

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

<b>Existing Airport Facilities</b>	<b>Affected Community Impacted by Operation of the Facility</b>
Runway 17/35	None
Runway 6/24	None
Terminal Building	None
Consolidated Rental Car Facility	None

The following Airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years:

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by Construction of the Facility</b>
Taxiway A Retaining Wall Rehabilitation (Construction Phase)	None
Airfield Electrical Vault Replacement (Design Phase)	None
ARFF Vehicle Replacement (Equipment)	None
Taxiway Hotel Rehabilitation (Design Phase)	None
Airport Master Plan Update	None
Main Escalator to Pedestrian Bridge Replacements (Design Phase)	None
Airfield Electrical Vault Replacement (Construction Phase)	None
Runway 17-35 Perimeter Road (Construction Phase)	None
Main Escalator to Pedestrian Bridge Replacement (Construction Phase)	None

<sup>16</sup> In order to carry out an alternative with a discriminatory impact, the MHT must demonstrate 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.



Taxiway Hotel Rehabilitation (Construction Phase)	None
Terminal Loop Road Rehabilitation and Landside Signage Upgrade (Planning)	None
Glycol Recovery System (Phase I Reimbursement)	None
Terminal Loop Road Rehabilitation and Landside Signage Upgrade (Construction)	None
Taxiway Echo and November Rehabilitation (Design)	None
North Cargo Ramp Snowmelter	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:

<b>Facilities or Construction Projects with Disparate Impacts</b>	<b>Affected Community Impacted</b>	<b>Impact Can Be Eliminated?</b>
Runway 17/35	None	N/A
Runway 6/24	None	N/A
Terminal Building	None	N/A
Consolidated Rental Car Facility	None	N/A
Taxiway A Retaining Wall Rehabilitation (Construction Phase)	None	N/A
Airfield Electrical Vault Replacement (Design Phase)	None	N/A
ARFF Vehicle Replacement (Equipment)	None	N/A
Taxiway Hotel Rehabilitation (Design Phase)	None	N/A
Airport Master Plan Update	None	N/A
Main Escalator to Pedestrian Bridge Replacements (Design Phase)	None	N/A
Airfield Electrical Vault Replacement (Construction Phase)	None	N/A
Runway 17-35 Perimeter Road (Construction Phase)	None	N/A
Main Escalator to Pedestrian Bridge Replacement (Construction Phase)	None	N/A
Taxiway Hotel Rehabilitation (Construction Phase)	None	N/A
Terminal Loop Road Rehabilitation and Landside Signage Upgrade (Planning)	None	N/A
Glycol Recovery System (Phase I Reimbursement)	None	N/A
Terminal Loop Road Rehabilitation and Landside Signage Upgrade (Construction)	None	N/A
Taxiway Echo and November Rehabilitation (Design)	None	N/A
North Cargo Ramp Snowmelter	None	N/A

**Justifications:**

The Airport's Environmental Justice Affected Communities data analysis, found that none of the census tracts within the Airport's Affected Communities are deemed eligible as an EJ Community of Concern.<sup>17</sup> As such, no facilities or construction projects have disparate impacts to the Airport's Affected Community.

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<sup>17</sup> Census tracts within the Airport's Affected Communities were deemed eligible Environmental Justice Communities of Concern if the minority population exceeded 50 percent of the total population, or the minority population percentage was meaningfully greater (at least 10 percentage points greater) than adjacent geographical units (the Airport's Surrounding Community), or if there was more than one group present and the minority percentage, as calculated by aggregating all minority persons, met one of the above-stated thresholds.

## 8. Limited English Proficiency

### Executive Order 13166

In creating its Language Assistance Plan, the Department of Aviation will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

According to **Section 6**, which presents community statistics, none have been identified as the language spoken by LEP persons in Affected Communities, which meets the safe harbor threshold for written translation.

The Department of Aviation also collects data on languages spoken by Airport guests.<sup>18</sup> Data sources include the following:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
Sabre Market Data – assumption from flight origin/destination	<a href="https://prod.marketintelligence.sabre.com/mi/MarketIntelligence.html#OD">https://prod.marketintelligence.sabre.com/mi/MarketIntelligence.html#OD</a>
U.S. DOT, DB1B Survey Market Data – assumption from flight origin/destination	<a href="https://mi.diio.net/mi/oandd/dynamic">https://mi.diio.net/mi/oandd/dynamic</a>
U.S. DOT, Form T-100 – assumption from flight origin/destination	<a href="https://mi.diio.net/mi/t100/dynamic">https://mi.diio.net/mi/t100/dynamic</a>
The World Factbook Field Listing – Languages – assumption from flight origin/destination	<a href="https://www.cia.gov/the-world-factbook/field/languages/">https://www.cia.gov/the-world-factbook/field/languages/</a>
Four and Forty-Two Group Classifications of Languages Spoken at Home with Examples – assumption from flight origin/destination	<a href="https://www.census.gov/topics/population/language-use/about.html">https://www.census.gov/topics/population/language-use/about.html</a>

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP Airport guests: Spanish and French.

Through MHT’s Four-Factor Analysis, Spanish and French have been determined to be the significant languages spoken by the MHT’s LEP persons.

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 translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will

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<sup>18</sup> We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language were not available beforehand, or the safe harbor threshold for written translation was not met.

inform Department of Aviation 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 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:

<b>Translation Vendors</b>	<b>Languages</b>
Not applicable	

- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>
Airport Information Booth – Volunteers will be trained to use Google Translate to provide on-demand translation services	Upon request <sup>19</sup>

**Interpretation Services:**

- The following vendors have been identified for interpretation services:

<b>Interpretation Vendors</b>	<b>Languages</b>
Department of Aviation Staff	Spanish and French

- Information regarding interpretation services can be obtained at:

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
Airport Information Booth – Volunteers will be trained to use Google Translate to provide on-demand translation services	Upon request <sup>19</sup>

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<sup>19</sup> Afrikaans, Albanian, Amharic, Arabic, Armenian, Assamese, Aymara, Azerbaijani, Bambara, Basque, Belarusian, Bengali, Bhojpuri, Bosnian, Bulgarian, Catalan, Cebuano, Chichewa, Chinese (Simplified), Chinese (Traditional), Corsican, Croatian, Czech, Danish, Dhivehi, Dogri, Dutch, Esperanto, Estonian, Ewe, Filipino, Finnish, French, Frisian, Galician, Georgian, German, Greek, Guarani, Gujarati, Haitian Creole, Hausa, Hawaiian, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Igbo, Ilocano, Indonesian, Irish, Italian, Japanese, Javanese, Kannada, Kazakh, Khmer, Kinyarwanda, Konkani, Korean, Krio, Kurdish, Kurdish (Sorani), Kyrgyz, Lao, Latin, Latvian, Lingala, Lithuanian, Luganda, Luxembourgish, Macedonian, Maithili, Malagasy, Malay, Malayalam, Maltese, Māori, Marathi, Meiteilon, Mizo, Mongolian, Myanmar, Nepali, Norwegian, Odia, Oromo, Pashto, Persian, Polish, Portuguese, Punjabi, Quechua, Romanian, Russian, Samoan, Sanskrit, Scots Gaelic, Sepedi, Serbian, Sesotho, Shona, Sindhi, Sinhala, Slovak, Slovenian, Somali, Spanish, Sudanese, Swahili, Swedish, Tajik, Tamil, Tatar, Tegula, Thai, Tigrinya, Tsonga, Turkish, Turkmen, Twi, Ukrainian, Urdu, Uyghur, Uzbek, Vietnamese, Welsh, Xhosa, Yiddish, Yoruba, Zulu

### **Description of Interpretation Assistance Processes:**

- Volunteer ambassadors are located within the Airport terminal. The information booth is staffed with volunteers who are trained to identify languages spoken and then employ translation services if needed. In the event a language cannot be identified, the translators have access to Google Translate. Volunteers are generally scheduled between 6:00 a.m. and 6:00 p.m., 7 days a week, depending on availability.
- MHT also employs a diverse group of personnel that speak different languages and are available on a volunteer basis. The languages spoken by Airport staff are the following: Spanish and French.
- The Airport is actively exploring a more comprehensive website translation service. This service may coincide with the launch of the Airport's new website which is anticipated in 2025.
- The Airport is actively exploring the utilization of a third-party translation contractor to provide translations upon request.

## 9. Transportation

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

As noted in **Section 6** 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 the Affected Communities are also identified below.

We have coordinated with Greyhound and Manchester Transit Authority 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.

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
None	Greyhound  Connects Manchester-Boston Regional Airport to their more than 3,800 destinations across North America.	Existing
None	Manchester Transit Authority Bus Route 3 “Brown Avenue/Manchester–Boston Regional Airport”  Connects downtown Manchester to Manchester-Boston Regional Airport	Existing
None	Manchester Transit Authority Bus Route 22 “Nashua Express – Zipline”  Connects downtown Nashua and Manchester to Manchester-Boston Regional Airport	Existing

Source: Manchester-Boston Regional Airport, “Ground Transportation Bus Schedule”; <https://www.flymanchester.com/ground-transportation/bus-schedule/>

## 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:

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
All Airport Business Opportunities	<ul style="list-style-type: none"> <li>• The City of Manchester, Department of Aviation, has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT).</li> <li>• Standard City of Manchester, Department of Aviation solicitation language is included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Arranging solicitations, times for the presentation of bids, specifications, and delivery schedules in ways that facilitate DBE participation (e.g., encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces).</li> <li>• Carrying out information and communications programs on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs on recipient mailing lists for bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors).</li> <li>• Ensuring distribution of the NHDOT DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.</li> <li>• Track contract awards to determine baseline conditions. That is, the Airport will determine the number of small businesses typically participating. This will be completed by having Prime Contractor(s) for Construction Work Items and for Professional Services Work Items complete the form entitled “Fostering Small Business Participation”.</li> <li>• Structure contracts to facilitate competition by small business concerns, taking all reasonable steps to eliminate obstacles to their participation, including unnecessary and unjustified bundling of contract requirements that may preclude small business participation in procurements as prime contractors or subcontractors.</li> <li>• Before establishing the overall goal each year, the Airport consults with the New Hampshire DOT’s Civil Rights Office, minority, woman’s and general contractor groups, community organizations and other officials or organizations to obtain</li> </ul>

	<p>information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Airport's efforts to establish a level playing field for the participation of DBEs.</p> <ul style="list-style-type: none"> <li>• The City of Manchester, Department of Aviation, has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (DOT).</li> </ul>
FAA Approved Runway Deicer Anti-Ice Fluid RFB	<ul style="list-style-type: none"> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> <li>• Solicitation was advertised on the Airport website, "Doing Business with MHT".</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> </ul>
Approved Runway Sand RFB	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, "Doing Business with MHT".</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> </ul>
Graphic Design, Public Relations, Marketing, and Advertising Services RFP	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, "Doing Business with MHT".</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> </ul>
On-Call Airport Planning Services RFQ	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, "Doing Business with MHT".</li> <li>• DBE goals were published in all bid and contract documents.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> <li>• Solicitations were advertised on the Airport website, "Doing Business with MHT".</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Required bidders to present intentions to mentor, train, and include DBE in any scope of work contemplated under this procurement action.</li> </ul>
On-Call Airport Architectural and Engineering Services RFQ	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, "Doing Business with MHT".</li> <li>• DBE goals were published in all bid and contract documents.</li> </ul>



	<ul style="list-style-type: none"> <li>• Notification of opportunity was posted in the local newspaper, the Union Leader.</li> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Required bidders to present intentions to mentor, train, and include DBE in any scope of work contemplated under this procurement action.</li> </ul>
Airport Uniforms RFB	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> </ul>
Ticket Counter Millwork Replacement RFB	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> </ul>
Collaboration/Tele-Conference Room RFB	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> </ul>
High Availability Server and Storage RFB	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> <li>• Notification of opportunity posted in the local newspaper, the Union Leader.</li> </ul>
Terminal Food and Beverage Concessions for Terminal Spaces #2085 and #2124 RFP	<ul style="list-style-type: none"> <li>• Solicitation was advertised on the Airport website, “Doing Business with MHT”.</li> <li>• Standard City of Manchester, Department of Aviation solicitation language was included to ensure minority and women-owned businesses participate on contracts.</li> </ul>

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 Properties and Contracts Business Unit.

## **11. Training**

New employee orientation will incorporate Title VI training upon FAA approval of this Plan. Topics will include:

- Title VI of the Civil Rights Act of 1964 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's 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 biannually.

## 12. Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations

FAA Notification. The Coordinator will notify the FAA of any pending investigations and reviews, including the following:

- Compliance reviews or audits concerning civil rights requirements<sup>20</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>21</sup>

As discussed in **Section 13**, Title VI Complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, the Department of Aviation 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.

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<sup>20</sup> Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the Department of Aviation or any of its sub-recipients by any state, local, or federal agency.

<sup>21</sup> Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, because of actions of the Department of Aviation itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

### 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 matters<sup>22</sup>
3. Allege misconduct by the Department of Aviation, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Department of Aviation 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 Department of Aviation. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Department of Justice or DOT, or the 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 office with the appropriate jurisdiction and the Airport Director.

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

Wayne Robinson  
Airport Internal Auditor  
Manchester-Boston Regional Airport  
1 Airport Road, Suite 300  
Manchester NH 03103

(603) 624-6539; wrobinson@flymanchester.com

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

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<sup>22</sup> 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.

instructed to submit a written complaint. Accommodation will be provided upon request for 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 the FAA.

### **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI Complaints must be promptly forwarded to the Coordinator *within 180 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 the FAA.) To transmit complaint information to the FAA, the Coordinator uploads information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from the 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 the 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 MHT, 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 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, as well as to 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 Airport Legal Counsel regarding the investigation and the report. Airport Legal Counsel will ensure 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 negotiations or other dispute resolution methods, as determined appropriate by the Department of Aviation.

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 Department of Aviation's conclusion regarding whether unlawful discrimination occurred, and it 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 Airport Director.
- 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, the Department of Aviation will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. The Airport's 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 Wayne Robinson.

This complaint procedure is shared with the public through the Airport website and emailed upon request.

# Appendix A Completed Unlawful Discrimination Poster

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## 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:** Wayne Robinson  
**Phone:** (603)-624-6539  
**Address:** 1 Airport Road, Suite 300  
Manchester, NH 03103

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## Discriminación Ilegal

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:** Wayne Robinson  
**Teléfono:** (603)-624-6539  
**Dirección:** 1 Airport Road, Suite 300  
Manchester, NH 03103



U.S. Department of Transportation  
Federal Aviation Administration

FAA-101098



## **Appendix B      Population / Language Data**

- *U.S. Census Bureau data Table S1701, “Poverty Status in the Past 12 Months”*
- *U.S. Census Bureau data Table B16001, “Language Spoken at Home by Ability to Speak English”*

## **Appendix C      Community Participation Plan**

The MHT Community Participation Plan (CPP) will be attached as Appendix C upon Federal Aviation Administration (FAA) approval of the CPP.