



Title VI Civil Rights Act of 1964 & Limited English Proficiency (LEP) Airport Partner Training





- What is Title VI and why is it important
- Prohibited Actions
- Title VI Complaint Process
- What is Limited English Proficiency (LEP)
- What are my responsibilities
- Summary

No persons in the United States shall, on the grounds of race, color, national origin, sex (including sexual orientation and gender identity), age, or creed, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Title VI of the Civil Rights Act of 1964

49 CFR Part 21, Nondiscrimination in Federally Assisted Programs

49 USC § 47123 expands the Title VI protected bases to include sex and creed

Age Discrimination Act of 1975

Airport and Airway Improvement Act of 1982

Why do you need to know about Title VI

Miami International Airport (MIA) receives federal funding and is therefore required to implement and abide by nondiscriminatory practices. This means that every person working within MIA is required to comply with these obligations and be familiar with Title VI and the related nondiscrimination legislation. Every person, includes, but is not limited to:

- **Employees**
- **Tenants**
- **Concessionaires**
- **Lessees**
- **Contractors**
- **Service Providers**
- **Fixed Base Operators**

How will Title VI training help you:

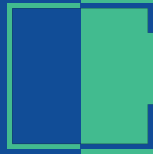
This training is intended to:

1. provide an understanding of your responsibilities to prevent acts of discrimination when engaging with airport users.
2. provide information on how to recognize, report, and resolve instances of discrimination.
3. provide familiarity on the actions, resources, and measures your company has established in its commitment to promote an environment of nondiscrimination.

Review Question # 1

Miami International Airport receives federal funding and is therefore required to implement and abide by, nondiscriminatory practices and every person working within MIA is required to carry out these obligations and be familiar with Title VI.

- A. True**
- B. False**



Correct answer is A, True.

During an audit, the FAA auditor can ask you if you are aware of Title VI and what does it mean. Your awareness is key to MIA's ongoing compliance.

What is Discrimination

Discrimination is unfair, unjust, or prejudicial treatment that is based on the grounds of any of these legally protected characteristics:

- **race**
- **color**
- **national origin (including limited English proficiency)**
- **sex (including sexual orientation and gender identity)**
- **age**
- **creed**

To be characterized as discrimination, the act does **NOT** have to be intentional.

Review Question # 2

Which of the following is a TRUE statement about discrimination?

- A. Discrimination is unfair, unjust, or prejudicial treatment that is based on a person's race, color, national origin, sex (including sexual orientation and gender identity), age, and/or creed.
- B. To be characterized as discrimination, the act **MUST** be intentional.
- C. A and B
- D. None of the above
- E. All of the above



Correct answer is A.

Answer B is incorrect because a discriminatory act does NOT have to be intentional.

Lack of intention does not prevent discrimination from occurring therefore awareness of how discrimination can occur is key.

What is prohibited

- Denying an individual access to services, opportunities, or other benefits for which that individual is otherwise qualified to receive;
- Discrimination against a Limited English Proficient (LEP) individual, which is described as someone who has a limited ability to read, speak, write, or understand English per Executive Order 13166;
- Providing a service, aid, or benefit in a different manner than how it is provided to others because of their race, color, national origin, sex, age, or creed;
- Addressing an individual in a manner that denotes inferiority because of race, color, national origin, sex, age, or creed.

Your company must take affirmative action to ensure nondiscrimination in its operations by:

- Informing your employees of the requirements under Title VI to ensure services are delivered in a nondiscriminatory manner.
- Abiding by nondiscrimination clauses and obligations in all contractual agreements with MDAD.
- Receiving periodic Title VI training for ongoing awareness of nondiscrimination practices and how to identify a discriminatory complaint. Training for business partners is available on the MIA website at: www.miami-airport.com/customer-service.asp

How do you comply

- Maintaining documentation to support Title VI training of your employees.
- Facilitating documentation to evidence compliance of Title VI requirements during MDAD's audit of your company.
- Posting the Unlawful Discrimination Notice throughout your venues to ensure the public is aware of their rights under Title VI. These can be requested to the Aviation Signage Manager. The following signage will help patrons with Title VI information.



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.

Title VI Coordinator:
Frances Gonzalez
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ADA Coordinator:
Natalie Pavlik
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Federal Regulations available for review at:
Building 5A
4200 NW 36th Street
Miami, FL 33166

Regulaciones Federales disponibles para revisión en:
Building 5A
4200 NW 36th Street
Miami, FL 33166



U.S. Department of Transportation
Federal Aviation Administration

Discriminacion 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

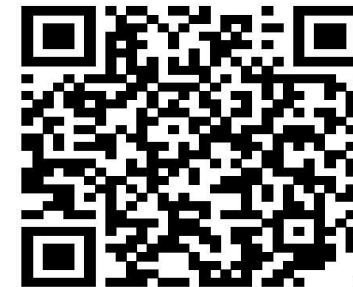
Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

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Scan QR Code for webpage & language translation options.

Escanee el código QR para ver la página web y las opciones de traducción de idiomas.



How do you comply

- Requiring all complaints alleging discrimination be thoroughly investigated through resolution, as mandated by law.
- Informing the airport's Title VI Coordinator of alleged discrimination complaints received within 24 hours of receipt.
- Updating the Title VI Coordinator during your investigative process and resolution of the complaint.

Title VI complaints may be received

- **In Person or By Phone** – The Complainant verbalizes or calls in to discuss their complaint. In this instance, the Complainant **must** be advised a written complaint should be submitted **within 180 calendar days** of the discriminatory event. If no written complaint is received, the issue is considered **closed**.
- All Title VI complaints are to be forwarded to the Title VI Coordinator within 24 hours. Whenever applicable, business partners will investigate complaints, provide steps taken in the investigation, and provide results of the investigation to the Title VI Coordinator or designated liaison.

Review Question # 3

All Title VI complaints must be reviewed, investigated, and reported to the Federal Aviation Administration (FAA) Office of Civil Rights?

- A. True**
- B. False**

Correct answer is A, True.

The FAA Office of Civil Rights must be notified of all discrimination complaints and receive follow-up information regarding the investigative efforts and the complaint's resolution.

What is Limited English Proficiency (LEP)

An individual with Limited English Proficiency (LEP) is someone who possesses a partial ability to read, write, speak, or understand English.

What is Limited English Proficiency (LEP)

Executive Order 13166, *Improving Access to Services for Persons With Limited English Proficiency*, sets forth obligations for the Airport to provide reasonable steps to ensure meaningful access to the information and services that are provided.

Under Title VI, the Airport must ensure that these individuals are not discriminated due to their inability to understand English.

What is your responsibility towards LEPs

Assist the LEP population by being familiar with the language assistance options provided by your company and the airport. This knowledge is imperative in public contact positions.

1. Identify the staff in your organization that have a fluency in or working knowledge of various languages to assist LEP persons.
2. Notify patrons that translation services in excess of 100 languages are available at the Customer Service and Information Counter located in Terminal E, 2nd Level via the Language Line service.
3. Utilize MIA's website, which provides passenger and airport information, is translatable into over 100 languages.

It is the responsibility of every airport business partner to understand the nondiscrimination obligations set forth under Title VI and the related legislation as well as Executive Order 13166 and the actions MIA has established to promote an environment of nondiscrimination and meaningful access. MIA cannot be found in compliance with these laws and requirements unless all its partners are aware and work in unison to remove discrimination at the airport.