



TITLE VI AND NON-DISCRIMINATION PLAN

TITLE VI PLAN

Disadvantaged Business Enterprise Office
Louis Armstrong New Orleans International Airport
P. O. Box 20007
New Orleans, LA 70141

Updated January 2022



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TITLE VI AND NONDISCRIMINATION POLICY STATEMENT

The Louis Armstrong New Orleans International Airport (MSY), owned by the City of New Orleans and maintained by the New Orleans Aviation Board (hereinafter referred to as "NOAB"), assures that no person or groups(s) of persons shall, on the grounds of race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and section 520 of the Airport and Airway Improvement Act of 1982 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the NOAB, regardless of whether those programs and activities are federally funded or not.

The Airport also assures that every effort will be made to ensure nondiscrimination in all of its programs, policies, and activities. The Airport will affirmatively insure that in any contract entered into, minority and women business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for Airport awards. Effort will be made to engage impacted communities and the general public in the Airport's decision-making processes as required by the federal and local regulations. In addition, the Airport will provide meaningful access to services for persons with Limited English Proficiency. The Airport is committed to compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related regulations and statutes. The Airport requires Title VI assurances from all tenants, contractors, and concessionaires providing an activity, service or facility under lease, contract or from franchise from the Airport.

The Disadvantaged Business Enterprise Liaison Officer (DBELO) serves as the NOAB's Title VI Coordinator responsible for initiating and monitoring Title VI and Non-Discrimination activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 CFR 21.

Louis Armstrong New Orleans International Airport
Philistine Ferrand, DBELO
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P. O. Box 20007
New Orleans, LA 70141
504-303-7610 (office) 504-303-7614 (fax)
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Dated: _____

By: _____
Kevin Dolliole, Director of Aviation
New Orleans Aviation Board



DEFINITIONS

New Orleans Aviation Board (NOAB) has developed this Title VI Plan for the MSY Airport to assure that services, programs, and activities are offered, conducted, and administered fairly, without regard to race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status.

The Airport will continually make efforts to prevent discrimination, including a program's impacts, access, benefits, participation, treatment, services, contracting opportunities, training, investigation of complaints, allocation of funds, prioritization of projects, and the overarching functions of planning, project development and delivery, right-of-way, construction, and research. Definitions for the NOAB's Title VI Plan are detailed below:

- **Applicant** means a person(s) who submits an application, request, or plan required to be approved by the Secretary, or by a primary recipient, as a condition to eligibility for Federal financial assistance, and "application" means such an application, request, or plan.
- **Complainant** is a party that makes a complaint that he or she or any specific class of persons has been subjected to discrimination or retaliation prohibited by any civil rights authority.
- **Discrimination** involves any act or inaction, whether intentional or unintentional, in any program or activity that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on such characteristics as race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status or in the case of disability, failing to make a reasonable accommodation.
- **Disparate Treatment** is defined as treating similarly situated persons differently because of race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status.
- **Disparate Impact** discrimination occurs when a "neutral procedure or practice" results in fewer services or benefits, or inferior services or benefits, to members of a protected group. With disparate impact, the focus is on the consequences of a decision, policy, or practice rather than the intent.
- **Facility** includes all or any part of structures, equipment, or other real or personal property or interests therein, and the provision of facilities includes the construction, expansion, renovation, remodeling, alteration, or acquisition of facilities.
- **Federal financial assistance** includes (1) grants and loans of Federal funds; (2) the grant or donation of Federal property and interests in property; (3) the detail of Federal personnel; (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.
- **Flex funding** refers to the program funds originally designated to one Operating Administrations (OA) that may be transferred to and obligated by another OA.
- **Investigator** refers to DOT or contract personnel responsible for conducting complaint investigations. Investigation of complaints may be part of one's primary job duties, or a duty assigned only occasionally.
- **Operating Administrations (OAs)** refer to the Federal Aviation Administration (FAA), the Federal Highway Administration (FHWA), the Federal Motor Carrier Safety Administration (FMCSA), the Federal Railroad Administration (FRA), the Federal Transit Administration (FTA), the Maritime Administration (MARAD), the National Highway Traffic Safety Administration (NHTSA), the Pipeline and Hazardous Materials Safety



Administration (PHMSA), the Research and Innovative Technology Administration (RITA), and the St. Lawrence Seaway Development Corporation (SLSDC).

- **Primary recipient** means any recipient that is authorized or required to extend Federal financial assistance to another recipient for the purpose of carrying out a program.
- **Programs or activities** mean all the operations of any entity receiving DOT financial assistance, as described in 49 CFR § 21.23(e). The Civil Rights Restoration Act of 1987 clarifies the definition of "programs and activities" covered by the nondiscrimination provisions of Title VI and other civil rights statutes (Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, as amended, and the Age Discrimination Act of 1975). Under the act, discrimination is prohibited throughout an entire agency or institution, if any part of that agency or institution receives Federal financial assistance. Title VI applies to discrimination throughout an agency, not just to actions involving the federally assisted program. Therefore, if an agency receives any Federal financial assistance for any program or activity the entire agency is required to comply with Title VI, not just that particular program or activity.
- **Recipient** may mean any state, territory, possession, the District of Columbia, or Puerto Rico, or any political subdivision thereof, or instrumentality thereof, any public or private agency, institution, or organization, or other entity, or any individual, in any state, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal financial assistance is extended, directly or through another recipient, for any program, including any successor, assignee, or transferee thereof, but such term does not include any ultimate beneficiary under any such program.
- **Sub-recipient** many mean any public or private agency, institution, or organization, or other entity, or any individual, to whom Federal financial assistance is extended, directly or through the City of New Orleans.

ABBREVIATIONS

- ADA (Americans with Disabilities Act of 1990)
- ADR (Alternative Dispute Resolution)
- DBE (Disadvantaged Business Enterprise)
- DBELO (DBE Liaison Officer)
- DOCR (Departmental Office of Civil Rights)
- DOJ (U.S. Department of Justice)
- DOT (U.S. Department of Transportation)
- EEOC (U.S. Equal Employment Opportunity Commission)
- FAA (Federal Aviation Administration)
- FOIA (Freedom of Information Act)
- IP (Investigative Plan)
- IR (Investigative Report)
- LEP (Limited English Proficiency)
- MSY (Louis Armstrong New Orleans International Airport)
- OA (Operating Administration)
- S-33 External Civil Rights Programs Division, DOCR



TITLE VI ADMINISTRATION

INTRODUCTION

Title VI of the 1964 Civil Rights Act, 42 U.S.C. 2000d provides that: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The broader application of nondiscrimination law is found in other statutes, executive orders, and regulations, which provide additional protections based on age, sex, religion, and disability, including the 1987 Civil Rights Restoration Act, which extended nondiscrimination coverage to all programs and activities of federal-aid recipients, subrecipients, and contractors, including those that are not federally-funded.

The MSY Airport is a recipient of Federal financial assistance from the United States Department of Transportation (USDOT), receiving Federal Aviation Administration funds. As recipient of USDOT funds, the Airport establishes this Title VI Nondiscrimination Plan for the purpose of complying with Title VI of the Civil Rights Act of 1964, as required by CFR 49, Part 21. This document details the nondiscrimination program, policies, and practices administered by this organization, and will be updated periodically to incorporate changes and additional responsibilities as they are made. The Airport operates its programs and services without regard to race, color, national origin, sex, religion, age, and disability in accordance with Title VI of the Civil Rights Act and related statutes. Any persons who believe they have been aggrieved by any unlawful discriminatory practice may file a complaint with the Airport or FAA.

The Airport has established a Disadvantaged Business Enterprise Program and an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26 and 23. It is the policy of the Airport to ensure that DBE and ACDBE firms as defined in Part 26 and 23, have an equal opportunity to receive and participate in contracting and concession opportunities. It is also our policy to:

- Ensure nondiscrimination in the award and administration of opportunities for contracting and concessions at our airport;
- Create a level playing field on which DBE and ACDBE firms can compete fairly for business opportunities;
- Ensure that our DBE and ACDBE Programs are narrowly tailored in accordance with applicable law;
- Ensure that only firms that fully meet this part's eligibility standards are permitted to participate as DBE and ACDBE firms at our airport; and
- Help remove barriers to the participation of DBE and ACDBE firms in business opportunities at our airport; and
- Promote the use of DBEs in all types of federally-assisted contracts and procurement activities;
- Assist the development of firms that can compete successfully in the market place outside the DBE Program; and
- Provide appropriate flexibility to recipients of Federal financial assistance in establishing and providing opportunities for DBEs.



ASSURANCES

The NOAB will require an assurance of compliance with the Civil Rights Act of 1964 from every sub-recipients or contractor before entering into any contract that involves the procurement of goods or services or other benefits on behalf of persons serviced by the Louis Armstrong New Orleans International Airport. Any contractor or subcontractor who enters into an agreement with the NOAB and fails or refuses to comply with Title VI of the Civil Rights Act of 1964, other applicable Civil Rights Laws and implementing regulations will be found in non-compliance. Failure to comply could result in contract suspension, termination or rejection. In addition, federal funds will be withheld or terminated as a preventive sanction for noncompliance.

As a condition to receiving any Federal financial assistance from the Federal Aviation Administration (FAA), the Airport will comply with Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. Section 2000d. The New Orleans Aviation Board, Airport, and its personnel, airport operators, lessees, tenants, concessionaires, contractors and airlines will not deny public services, employment and program opportunities to any person due to race, color, national origin, and disability or be otherwise subjected to discrimination pursuant to the Code of Federal Regulations, Department of Transportation, Part 21 -Title VI of the Civil Rights Act of 1964.

As a condition to receiving any Federal financial assistance, the Airport does not discriminate on the basis of disability in admission to, access to, treatment of, or employment in its programs and activities. This notice is provided as required by the Rehabilitation Act of 1973, Section 504, and Title II of the Americans with Disabilities Act of 1990.

New Orleans Aviation Board (NOAB) will promptly take any measures necessary to effectuate this Plan. These assurances obligate for the period during which Federal financial assistance is extended. The Airport agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the statutes and regulations cited above, other pertinent directives, and the above assurances.

In addition to these assurances, the Airport agrees to file: a summary of all complaints filed against it within the past year that allege violation(s) by the Recipient of Title VI of the Civil Rights Act of 1964, as amended, Section 504 of the Rehabilitation Act of 1973, as amended, or the Air Carrier Access Act of 1986; or a statement that there have been no complaints filed against it. The summary should include the date the complaint was filed, the nature of the complaint, the status or outcome of the complaint (*i.e.*, whether it is still pending or how it was resolved).



PROGRAM ADMINISTRATION

The Title VI Coordinator or designee is responsible for initiating and monitoring Title VI activities, preparing required reports and other required responsibilities.

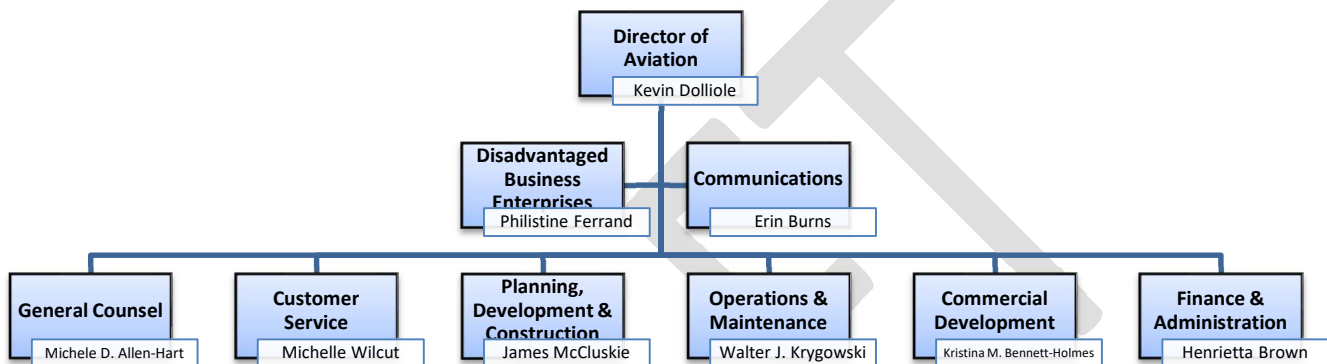
Title VI Coordinator Responsibilities:

- Receives records and forwards a copy of Title VI complaints to the Federal Aviation Administration (FAA) within 15 days of receipt.
- Provides the FAA with an explanation of resolution attempts regarding the complaint. 49 CFR Part 21 Appendix C (b) (3).
- Annually reviews the airport's Title VI plan and disseminates Title VI information, education, etc. to program liaisons.
- Responds to requests by FAA for data and records to determine Title VI compliance.
- Coordinates with program liaisons to ensure that racial and ethnic data showing the extent to which minority groups are beneficiaries of or impacted by airport programs is available. 49 CFR 21.9 (b) & (c).
- Maintains a list of the race, color, and national origin representation on nonelected planning and advisory bodies for the airport.
- Identifies any disparity between representation on these entities and the airport beneficiaries to the selecting official/committee when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours.
- The Title VI Coordinator will handle Americans with Disabilities Act (ADA) complaints, under the direction and supervision of the DBE Liaison Officer and in partnership with the NOAB Legal Department. The coordinator is responsible for handling all complaints relative to discrimination against persons with disabilities.
- Title VI Reporting is handled by the Title VI Coordinator, under the direction and supervision of the DBE Liaison Officer (if delegated) and in partnership with the NOAB Legal Department



MSY TITLE VI PROGRAM ORGANIZATIONAL CHART

This Figure outlines the administration of the MSY Airport's Title VI Program**



** The MSY Title VI Program Organizational Chart reflects a cross-sectional team across the Airport's organization. This chart does not represent the Airport's structure of different departments.

APPLICABLE CONTRACT LANGUAGE

The Airport, in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities, and Title 49 Code of Federal Regulations, Parts 21 and 26, affirmatively assures bidders will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

Further, the Airport ensures all contractors will fulfill their contracts in a nondiscriminatory manner. While contractors are not required to prepare a Title VI Program, they must comply with the nondiscrimination requirements of the organization to which they are contracted. MSY and its contractors will not discriminate in the selection and retention of contractors (at any level) or discriminate in employment practices in connection with any of our projects. During the performance of an Airport contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. Compliance with Regulations. The contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time



(hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination. The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment. In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
4. Information and Reports. The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the NOAB or the Federal Aviation Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to the sponsor or the FAA, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance. In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the NOAB shall impose such contract sanctions as it or the FAA may determine to be appropriate, including, but not limited to:
 - a. Withholding of payments to the contractor under the contract until the contractor complies, and/or
 - b. Cancellation, termination, or suspension of the contract, in whole or in part.
6. Incorporation of Provisions. The contractor shall include the provisions of these paragraphs in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued Pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as the sponsor or the FAA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the Sponsor to enter into such litigation to protect the interests of the sponsor and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.



SUBRECIPIENTS, SUBCONTRACTS AND VENDORS

All sub-recipients, contractors, consultants and vendors are monitored for compliance with program requirements, as applicable. All sub-recipients, subcontractors and vendors who receive payments from the NOAB and/or City of New Orleans where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964.

TRAINING

The Airport is committed to supporting the nondiscriminatory administration of its programs and services through training. Basic training will cover overall Title VI obligations. Airport personnel may receive specialized training on the application of Title VI in their specific work areas. All personnel will receive basic Title VI training as part of new hire orientation process. Title VI and LEP policy and procedures training will be incorporated in the orientation activities for new hires to ensure that all Airport personnel remain aware of federal requirements for compliance, and have the capacity to assist LEP persons that engage with the airport. Further, Airport personnel periodically will receive additional refresher Title VI training, and be reminded of our Title VI nondiscrimination obligations annually. The Airport's Title VI training requirements will be documented in the Human Resources Department and Interactive Training System badging procedures.

MONITORING

Monitoring and compliance will be the responsibility of the Title VI Coordinator in partnership with the NOAB Legal Department. All sub-recipients will be required to provide an annual report of compliance with the Airport's Title VI policy and requirements.

RECORD KEEPING

The Title VI Coordinator will maintain records, which include, but are not limited to copies of Title VI complaints or lawsuits and related documentation.

LEP RESOURCES

All terminal wayfinding signage within the Louis Armstrong New Orleans International Airport is in English and includes the standard aviation international symbols as described in:

- FAA Advisory Circular AC 150/5360-12F,
- Airport Signing and Graphics and Airport Cooperative Research Program (ACRP) Report 52,
- Wayfinding and Signing Guidelines for Airport Terminals and Landside

Louis Armstrong New Orleans International Airport provides accessibility and language support on its website at www.flymsy.com:

- It enables visitors to customize their experience to best suit their individual needs
- Those with a disability, learning difficulty, low visual impairment, or speak English as a second language, can access information barrier-free



- The toolbar includes a variety of features, such as:
 - a screen reader
 - reading aids
 - fully customizable styling options, and
 - a translation tool with over 107 languages

The Airport Communications Center (AVCOM) at the Louis Armstrong International Airport has an active account with Language Line:

- Language Line offers over 240 languages on-demand through 14,000 professional interpreters

The Airport Customer Service Department has several team members that are bi-lingual with the second language being Spanish:

- They are available from 4 AM until 8 PM daily
- Additionally, many of the janitorial employees speak Spanish and are able to assist within the terminal

For general language assistance, many staff members have turned to Google Translate to provide basic information on directing persons through the facility and helping them to find basic location.

TITLE VI PUBLIC INFORMATION & PUBLIC NOTICE DISSEMINATION

The Airport understands that transparent public involvement is a key element in addressing Title VI in decision-making. Airport will disseminate information and engage the public by seeking out and considering the needs and input of interested parties and those traditionally underserved by existing transportation systems, such as minority and limited English proficient persons, who may face challenges accessing programs and other services.

The Title VI Coordinator, in partnership with the Airport's Marketing and Communications Departments, will be responsible for ensuring access to information and the participation of individuals in the Airport's decision-making process relative to federally funded projects. The Airport ensures that required notices of public hearings and opportunities to comment on proposed airport actions reach all segments of the impacted community. The Airport maintains records of all such notices and the efforts made to reach the affected community. General public involvement practices include:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities. NOAB Board Meetings and other public meetings held in centralized locations; and employing different meeting formats, including virtual meetings.
- Advertisements with local media outlets and minority newspapers; including radio, television, or newspaper ads on stations and in publications that serve LEP populations.
- Outreach with various small business, professional, minority and women-owned organizations and business;
- Online posting of information on the Louis Armstrong New Orleans International Airport website at www.flymsy.com.
- To ensure that the community is effectively informed of and able to participate, advertising of public notices in appropriate languages when a significant number or proportion of the affected community



has limited English proficiency. Such notices will include direction for obtaining an interpreter free of charge for the public hearing. 28 CFR § 42.405(d).

Passengers and other interested persons will be informed of their rights under Title VI and related authorities with regard to our program. The primary means of achieving this will be posting and disseminating the policy statement and notice as stipulated Title VI Nondiscrimination Policy Statement and Notice of Nondiscrimination. Additional measures may include openly stating our obligations and the public's rights at meetings, placing flyers at places frequented by targeted populations, and an equal opportunity tag-on at the end of Airport announcements.

Title VI and Non-Discrimination information posters, containing the Public Notice below, shall be prominently and publicly displayed in all major facilities of the airport and will be available on the Louis Armstrong New Orleans International airport website at <http://www.flymsy.com>.

LOUIS ARMSTRONG NEW ORLEANS INTERNATIONAL AIRPORT TITLE VI PUBLIC NOTICE

In Compliance with Title VI of the Civil Rights Act of 1964, Louis Armstrong New Orleans International Airport, owned by the City of New Orleans and maintained by the New Orleans Aviation Board, operates all of its programs and provides aviation services without regard to race, color, or national origin. NOAB is committed to providing non-discriminatory services that is open to the general public.

Anyone who believes that they have been subject to an unlawful discriminatory practice by the Airport, or its contracted third party operators, has the right to file a complaint with the New Orleans Aviation Board. Anyone who has a discrimination complaint should call the Title VI Coordinator, Philistine Ferrand at 504.303.7610. Formal complaints should be in writing and emailed (or mailed) to:

Philistine Ferrand
DBE Liaison Officer
Louis Armstrong New Orleans International Airport
P. O. Box 20007
New Orleans, LA 70141
504-303-7610 (office) 504-303-7614 (fax)
philsti@flymsy.com



TITLE VI COMPLAINTS

BASIS FOR TITLE VI COMPLAINT

Formal written allegations must be based on issues involving race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status race, color, national origin, sex, age, income or disability as defined below:

Protected Group Categories	Definition
Race	An individual belonging to one of the accepted anthropological racial groups and/or the perception based on physical characteristics that a person is a member of a racial group
Color	Color of skin including shade of skin within a racial group.
National Origin	National birth site. Citizenship is not a factor Discrimination based on language or a person's accent is covered by national origin
Sex	Gender
Age	Persons of any age
Income	Low-income individuals, permanent, temporary or perceived
Disability	Physical or mental impairment, permanent, temporary or perceived

Generally, Title VI complaint procedures are for complaints of discrimination by the Airport, other than employment discrimination. Thus, they apply to discrimination by airport personnel, contractors, concessionaires, lessees, or tenants of the MSY Airport facilities based upon race, creed, color, national origin, or sex, including but not necessarily limited to complaints under Title VI of the Civil Rights Act of 1964 and the Civil rights Restoration Act of 1987. They cover any program or activity administered by the Airport.

Any person who feels that he or she has been subjected to discrimination on the basis of race, creed, color, national origin, or sex has the right to file a complaint with the Airport. These procedures do not deny or limit the right of a complainant to file a formal complaint with an outside agency, such as the U.S. Department of Transportation or Federal Aviation Administration (FAA), or to seek private legal counsel regarding discrimination.

Title VI complaints must be filed within 180 days after the alleged discriminatory event, must be in writing, and must be delivered by one of the following:

By mail to:

MSY International Airport
Attn: Philistine Ferrand- DBELO
Louis Armstrong New Orleans International Airport
P. O. Box 20007
New Orleans, LA 70141
Or by email: philisti@flymsy.com

Complainants may also file a written complaint directly to the FAA:

Federal Aviation Administration
Office of Civil Rights, ACR1
800 Independence Avenue SW
Washington, D.C. 20591



Complaints must be filed within six months (180 days) of the act of discrimination. At a minimum, complaints must include the following information:

- Name, mailing address, and contact information;
- How, when, where, and why complainant alleges they were discriminated against;
- Names and contact information of any witnesses;
- Any other significant information.

Once the correspondence is deemed a complaint, the Title VI coordinator will acknowledge acceptance of the complaint via a written or electronic (e-mail) statement. If an attorney submits the complaint on behalf of a complainant, the Title VI coordinator must contact the attorney and must request permission to contact the complainant directly. The Title VI coordinator will review the complaint for complete information in order to proceed with processing, investigation, and resolution. For a complaint to be complete it must include the required information, and any additional written details regarding the alleged discrimination that may be requested by the Coordinator.

Once the basis of the complaint investigation is determined, the Title VI Coordinator will initiate the investigation. The complaint investigation may involve: Interviews with the parties to the complaint; Interviews with third parties involved with the issue, incident or event; Collection and review of supporting documentation; Review of applicable regulations; and/or Other methods of data collection and analysis as warranted. All parties to the complaint, including the complainant, must comply with all requests for information from the Title VI coordinator. The Title VI Coordinator has 90 business days to conduct and complete the investigation and prepare an investigative report, except in cases of a disparate impact investigation, and to provide the findings, in writing, to the complainant.

The Title VI Coordinator may decline to proceed with a complaint for one or more of the following reasons:

- The complaint is not supported by the regulations, is lacking in detail, or without merit and as a whole cannot be considered to be grounded in fact.
- The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- Litigation has been filed by the complainant with the same basis and issues involved in the complaint. In such cases, the complaint should not be held in abeyance, but dismissed.
- The complainant withdraws the complaint.

If a complainant disagrees with the response of the Title VI Coordinator he/she may request reconsideration by submitting a written request to the NOAB Legal Department. The written request for reconsideration must be submitted within 10 calendar days after receipt of the Title VI Coordinator's response and must be sufficiently detailed to contain any items the complainant feels were not fully understood or investigated. If the request for reconsideration is denied by the Legal Department, the complainant may appeal by submitting a written appeal to the Office of Civil Rights of Louisiana Department of Transportation & Development. A request for appeal must be submitted in writing within 10 calendar days of the Airport's response rejecting the reconsideration. If the complainant is unable to or incapable of preparing a written request for appeal the Airport must provide the complainant assistance in converting a verbal request into a written request.



GENERAL OVERVIEW OF COMPLAINT PROCESS

1. If the written complaint is determined to have merit, the Airport will investigate and attempt an early resolution. If a complaint is received, the Title VI Coordinator will provide written acknowledgment to the complainant within ten (10) business days. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information. Failure to do so may be considered good cause for a determination of no investigative merit.
2. The Airport will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation. If the complaint is to be investigated, the notification shall state the grounds of the Airport's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.
3. Within 15 days of receiving a written complaint, the Title VI Coordinator will forward a copy of the complaint to the FAA Airport Nondiscrimination Compliance Program Team, along with a statement describing all actions taken to resolve the matter and the results of such actions. The Title VI Coordinator will work with the Airport Nondiscrimination Compliance Program Team during this process.
4. The Title VI Coordinator will make every effort to complete discrimination complaint investigations within sixty(60) calendar days after the written complaint is received but recognizes that some investigations may take longer. The Title VI Coordinator will document each investigation in an investigation report.
5. Upon completion of the investigation, the Title VI Coordinator will issue either a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was no finding of a Title VI violation and that the investigation will be closed. A letter of finding summarizes the allegations and investigation findings and explains whether any disciplinary action, additional training, or other action will occur.
6. If the complainant disagrees with the conclusion of the investigation, the complainant may request an appeal in writing to the Director of Aviation. The written appeal, including all arguments, evidence and documents supporting the appeal, must be received within ten business days of the decision letter. The Airport will issue a final written decision in response to the appeal within thirty business days. The Airport's decision is final.
7. Copies of the complaint, summary of the investigation report, any response, and the Airport's decision letter(s) will be sent to the FAA.

COMPLAINT GUIDELINES

A formal Title VI complaint is a written or electronic statement concerning allegations of discrimination. Anonymous or unsigned correspondence, verbal allegations or inquiries seeking advice or information are not considered a formal complaint. The Title VI Coordinator or designee may investigate other correspondence or verbal communication that potentially involves a Civil Rights issue or violation of Title VI.



Additionally, the Title VI Coordinator must investigate any indications of disparate treatment or disparate impact.

- **Cooperation with FAA.** The Title VI Coordinator will promptly investigate all discrimination complaints, including those referred to the Federal Aviation Administration (FAA) for investigation. In investigating a complaint that has been referred to the FAA, the Title VI Coordinator or designee will endeavor to avoid interfering with the FAA investigation, will cooperate with the FAA when possible, and will share factual information with the FAA.
- **Consultation with Legal Counsel.** In every case, the Title VI Coordinator or designee will consult with the NOAB Legal Department regarding the investigation and the report.
- **Written Complaints Required.** If a verbal complaint is received, the complainant should be given a copy of the Airport's Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written request.
- **Contact with Complainant.** The Title VI Coordinator should meet with the complainant to clarify the issues and obtain additional information.
- **FAA Notification.** Within 15 days of receipt, The Title VI 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, Regional Civil Rights Staff.
- **Initial Receipt of Written Complaint.** Title VI Coordinator will log in the complaint and promptly send copies of the complaint to:
 - The office named in the Complaint
 - NOAB Legal Department
 - Airport CEO
- **Assignment of Investigator.** The Title VI Coordinator will immediately begin the investigation or designate an investigator.
- **Prompt Resolution of Disputes.** The Title VI Coordinator will quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through negotiation.
- **Prompt Investigation.** The Title VI Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received but recognizes that some investigations will take longer.
- **Investigation Report.** After completing the investigation, the Title VI Coordinator will prepare a written report.
- **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 Airport's conclusion regarding whether unlawful discrimination occurred and will describe the complainant's appeal rights.

- **Appeal and Final Administrative Action.** If the complainant disagrees with the written response or conclusion, the complainant may appeal in writing to the Aviation Director. The written appeal must be received within ten (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 will determine and select a hearing officer from its pool of external legal counsel. The hearing officer's decision shall be made based solely on the entire administrative record presented with the original complaint. This serves as the final written decision in response to the appeal. The complainant will not be allowed to submit new documentation or material after hearing officer's decision has been rendered without filing for another appeal.
- **Avoiding Future Discrimination.** In addition to taking action with respect to any specific instances of discrimination, the Airport will identify and implement measures to reduce the chances of similar discrimination in the future.
- **Intimidation and Retaliation Prohibited.** Airport personnel will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.
- **Copies to FAA.** Copies of each Title VI complaint, a summary of the investigation report, any response, and the Airport's transmittal letter to the complainant will be sent to the FAA.
- **New Orleans Aviation Board Contracting.** If the Airport determines that there is a viable discrimination complaint relative to an entity with is an active contract, the Title VI Coordinator shall consider utilization of the termination for cause provision. Alternatively, if a contract is about to expire, the NOAB reserves the right to terminate and/or opt to not renew pending the Complaint outcome or a determination of Title VI violations. If there is no contract in place, but the entity is a respondent to an Airport RFP/RFQ or a bidder, evidence of Title VI violations may support the Airport's determination that the entity is not responsible and should be disqualified.



AIRPORT DISABILITY COMPLIANCE PROGRAM (ADCP)

AMERICANS WITH DISABILITIES ACT ("ADA") POLICY STATEMENT

It is the intent of the New Orleans Aviation Board to provide access to the Louis Armstrong New Orleans International Airport ("Airport") and the services associated with its operation to persons with disabilities in accordance with Title II of the Americans with Disabilities Act ("ADA") of 1990 and Section 504 of the Rehabilitation Act of 1973 ("Section 504"). Oversight of compliance activities is the responsibility of the ADA Coordinator and all inquiries concerning the Authority's efforts to make the Airport and the services associated with the operation of the Airport accessible to persons with disabilities should be directed to the Section 504/ADA Coordinator or designee:

Attn: Philistine Ferrand, DBE Liaison Officer
Louis Armstrong New Orleans International Airport
P. O. Box 20007
New Orleans, LA 70141
504-303-7610 (office) 504-303-7614 (fax)
philsti@flymsy.com

Pursuant to Title II of the ADA and implementing regulations at 28 C.F.R. § 35.107, and pursuant to Section 504 and implementing regulations at 49 C.F.R. § 27.13, the Airport has established the following formal complaint procedure to be used by persons to allege a violation of the ADA or Section 504. The ADA Complaint Procedure is intended to provide for the prompt and equitable resolution of complaints alleging prohibited discrimination on the basis of disability. Individuals are not required by federal regulations to use this ADA Complaint Procedure, but may file complaints directly with the appropriate enforcement agency.

ADA COMPLAINT PROCEDURES

Any person, or his or her representative, who believes that he or she or any specific class of persons has been subjected to discrimination or retaliation based on their disability may file a complaint with the DOT or the FAA, pursuant to the Sec. 504 of the Rehabilitation Act of 1973 (Sec. 504), Americans with Disabilities Act of 1990 (ADA), and Air Carrier Access Act. Complaints must be filed within 180 days of the alleged violation or discriminatory act, unless extended by FAA.

Complaints must be submitted to the Section 504/ADA Coordinator within 90 days of the alleged discriminatory action. Complaints must be in writing and include the name, address, email address and phone number of the person filing it. The complaint must state in reasonable details the alleged discriminatory action and the remedy or relief sought. Upon request, the NOAB may provide alternative means to accommodate a complainant, including: personal interview/tape recording/use of sign language interpreter, upon request, for persons with visual, motor or auditory impairments. The ADA Coordinator or designee will communicate with the complainant to confirm and acknowledge receipt and approval of the written complaint. Within fifteen (15) calendar days, the ADA Coordinator or designee will respond in writing, or format accessible to the complainant, to explain the Airport's position and/ or offer options for substantive resolution. Notice of Extension of Time will be sent to complainant, if necessary, to extend NOAB's response period for an



additional 15 days. If the response does not satisfactorily resolve the issue, the complainant may appeal the Airport's decision to the NOAB Legal Department within thirty (30) calendar days of receipt of the response.

The ADA Coordinator or designee submits all complaints and a statement describing all actions taken to resolve the matter to the FAA Regional Civil Rights staff.

Filing of a Grievance: The complaint should be documented in writing. The Grievance must contain the following information:

- The complainant's name and address, phone number and other means by which the complainant may be contacted.
- Identification of individual(s) or organization(s) responsible for the alleged discrimination.
- A description of the complainant's allegations, which must include enough detail to determine whether the Airport has jurisdiction over the complaint and if the complaint was timely filed.
- The specific prohibited base(s) of alleged discrimination.
- The complainant's signature or signature of his/her authorized representative.

In the event that a person makes a verbal complaint of discrimination to an Airport officer or personnel, the ADA Coordinator shall interview the complainant. If necessary, the ADA Coordinator will assist the complainant in reducing the complaint to writing. If a complainant is unable to complete a written complaint due to disability or limited-English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner.

Filing timeframe: The Complaint should be submitted no later than one hundred-eighty (180) calendar days after the alleged violation. The Airport may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing. The filing date is the date the person submits the written complaint. Strict confidentiality of all information provided will be maintained to the extent permitted by law. Sharing of information, including identity, will be done only as required by law or as needed to resolve the complaint.

Notice of Receipt: All ADA complaints shall be referred to the Airport's ADA Coordinator or designee for review and action. No later than fifteen (15) calendar days of receipt of the complaint, the ADA Coordinator or designee shall issue a written Notice of Receipt.

Processing: The ADA Coordinator, with the assistance of the NOAB Legal Department or designee, will receive, manage, and make a determination on all filed complaints. The ADA Coordinator will attempt to discuss the issues with the complainant and the concerned department(s), and will attempt to resolve the complaint informally. If more information is needed to resolve a grievance, the ADA Coordinator or designee may contact the complainant and request more information. If the requested information is not received within fifteen (15) calendar days from the date of the request, the ADA Coordinator or designee may administratively close the complaint. A complaint may also be administratively closed if the complainant no longer wishes to pursue the matter. Investigations will generally be completed within ninety (90) calendar days from receipt of an approved written complaint.



At the conclusion of the resolution process the ADA Coordinator or designee will send the complainant and the concerned department(s) a final response and notice of outcome along with a description of the appeals process.

Appeal: If the ADA Coordinator or designee's final response does not satisfactorily resolve the matter, the complainant and/or authorized representative may appeal it, in writing, to NOAB Legal Department. An appeal, including a detailed description of its bases, must be filed no later than thirty (30) calendar days after the date of the ADA Coordinator or designee's final response. Within thirty (30) calendar days after receipt of the appeal, the NOAB Legal Department or designee (the "Appeal Officer") shall attempt to meet with the complainant to discuss the complaint and possible resolutions. Within sixty (60) calendar days after the filing of the appeal, the Appeal Officer shall respond, in writing, with a final resolution of the complaint.

Recordkeeping: The Airport will maintain the following materials for a period of three (3) years: (1) written received by the ADA Coordinator; (2) final responses of the ADA Coordinator; (3) appeals to the Appeal Officer; and (4) final resolutions by the Appeal Officer.

This Airport's ADA Policy Statement & Complaint Procedure is available on the flymsy.com Airport website or upon request by contacting the Disadvantaged Business Enterprise (DBE) Office.



APPENDIX A: Title VI Federal Guidance

This Appendix contains the general Civil Rights Provisions, which are incorporated in all grant agreements between a sponsor and the FAA.

Section 18.08 General Civil Rights Provisions (Required by the FAA)

- A. Concessionaire agrees that it will comply with pertinent statutes, Executive Orders and such rules as are promulgated to ensure that no person shall, on the grounds of race, creed, color, national origin, sex, age, or handicap be excluded from participating in any activity conducted with or benefiting from Federal assistance. This provision is in addition to that required of Title VI of the Civil Rights Act of 1964.
- B. This provision also obligates Concessionaire or its transferee for the period during which Federal assistance is extended to the airport through the Airport Improvement Program, except where Federal assistance is to provide, or is in the form of personal property; real property or interest therein; structures or improvements thereon.
- C. In these cases, the provision obligates the party or any transferee for the longer of the following periods:
 - 1. The period during which the property is used by the airport sponsor or any transferee for a purpose for which Federal assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - 2. The period during which the airport sponsor or any transferee retains ownership or possession of the property.

Section 18.09 Title VI Civil Rights Provisions (Required by the FAA)

- A. During the performance of this contract, Concessionaire, for itself, its assignees, and successors in interest agrees as follows:
 - 1. Compliance with Regulations: Concessionaire (hereinafter includes consultants) will comply with the Title VI List of Pertinent Nondiscrimination Statutes and Authorities, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
 - 2. Non-discrimination: Concessionaire, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. Concessionaire will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR part 21.
 - 3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each



potential subcontractor or supplier will be notified by Concessionaire of the Concessionaire's obligations under this Lease and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.

4. Information and Reports: Concessionaire will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the sponsor or the Federal Aviation Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of Concessionaire is in the exclusive possession of another who fails or refuses to furnish the information, Concessionaire will so certify to the sponsor or the Federal Aviation Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
 5. Sanctions for Noncompliance: In the event of Concessionaire's noncompliance with the Non-discrimination provisions of this contract, the sponsor will impose such contract sanctions as it or the Federal Aviation Administration may determine to be appropriate, including, but not limited to:
 - a. Withholding payments to Concessionaire under this Lease until Concessionaire complies; and/or
 - b. Cancelling, terminating, or suspending this Lease, in whole or in part.
 6. Incorporation of Provisions: Concessionaire will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. Concessionaire will take action with respect to any subcontract or procurement as the sponsor or the Federal Aviation Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if Concessionaire becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, Concessionaire may request the sponsor to enter into any litigation to protect the interests of the sponsor. In addition, Concessionaire may request the United States to enter into the litigation to protect the interests of the United States.
- B. Title VI List of Pertinent Nondiscrimination Authorities—During the performance of this contract, Concessionaire, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following nondiscrimination statutes and authorities; including but not limited to:
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
 - 49 CFR part 21 (Non-discrimination In Federally-Assisted Programs of The Department of Transportation—Effectuation of Title VI of The Civil Rights Act of 1964);
 - The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
 - Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR part 27;



- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age
- Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act of 1990, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 – 12189) as implemented by Department of
- Transportation regulations at 49 CFR parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100)
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).



APPENDIX B: Non – Discrimination Contract Provisions For Contractors

Non-Discrimination. In the performance of this Agreement, the Contractor will not discriminate on the basis, whether in fact or perception, of a person's race, color, creed, religion, national origin, ancestry, age, sex (gender), sexual orientation, gender identity, domestic partner status, marital status, physical or mental disability, or AIDS/HIV-status against (1) any employee of the City working with the Contractor in any of Contractor's operations within Orleans Parish or (2) any person seeking accommodations, advantages, facilities, privileges, services, or membership in all business, social, or other establishments or organizations operated by the Contractor. The Contractor agrees to comply with and abide by all applicable federal, state and local laws relating to non-discrimination, including, without limitation, Title VI of the Civil Rights Act of 1964, Section V of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990.

Non-Discrimination in Employment. In all hiring or employment made possible by, or resulting from this Agreement, there (1) will not be any discrimination against any employee or applicant for employment because of race, color, religion, gender, age, physical or mental disability, national origin, sexual orientation, creed, culture, or ancestry, and (2) where applicable, affirmative action will be taken to ensure that the Contractor's personnel are treated during employment without regard to their race, color, religion, gender, age, physical or mental disability, national origin, sexual orientation, creed, culture, or ancestry. This requirement shall apply to, but not be limited to the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. All solicitations or advertisements for personnel shall state that all qualified applicants will receive consideration for employment without regard to race, color, religion, gender, age, physical or mental disability, national origin, sexual orientation, creed, culture, or ancestry. The Contractor will require all subcontractors to comply with the requirements of this article.



APPENDIX C: MSY Title VI Complaint Form

SAMPLE



New Orleans Aviation Board
New Orleans International Airport (MSY)
Title VI Complaint Grievance Form

Please, submit this form in person or via e-mail at the address below, or mail this form to: Louis Armstrong New Orleans International Airport, Philistine Ferrand, DBE Liaison Officer, P.O. Box 20007, New Orleans, Louisiana 70141 Telephone Number: (504) 303-7610, Fax Number: (504) 303-7614, Email: philisti@flymsy.com	
Section I:	
Name:	
Address:	
Telephone (Home):	Telephone (Work):
E-Mail Address:	
Accessible Format Requirements? <input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other: _____	
Section II:	
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes* <input type="checkbox"/> No <i>*If you answered "Yes" to this question, go to Section III.</i>	
If "No," please supply the name and relationship of the person for whom you are complaining: _____ _____ _____	
Please explain why you have filed for a third party: _____ _____ _____	
Please, confirm that you have obtained the permission of the aggrieved, third party: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Section III:	
I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Ethnicity <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> Ancestry <input type="checkbox"/> Sex/Gender <input type="checkbox"/> Gender Identity <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Other: _____	



SAMPLE

Date of Alleged Discrimination (Month/Day/Year). _____

Explain, as clearly as possible, what happened and why you believe you were discriminated against. Describe all persons who were involved. If more space is needed, please use the back of this form or a separate sheet of paper.

Include the name(s) and contact information of the person(s) who discriminated against you (if known).

Please list any and all witnesses' names, employers and contact information, if applicable:

What type of corrective action would you like to see taken?

Section IV

Have you previously filed a Title VI complaint with the Airport? ☐ Yes ☐ No



New Orleans Aviation Board
New Orleans International Airport (MSY)
Title VI Complaint Grievance Form

SAMPLE

Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If "Yes," check all that apply:				
<input type="checkbox"/> Federal Agency: _____				
<input type="checkbox"/> Federal Court: _____		<input type="checkbox"/> State Agency: _____		
<input type="checkbox"/> State Court: _____		<input type="checkbox"/> Local Agency: _____		
Please, provide information about a contact person at the agency/court where the complaint was filed.				
Name	Title	Agency	Address	Telephone
Section VI				
Please, list any person(s) whom we may contact for additional information to support your complaint. (Attach additional sheets, if necessary.)				
Name	Address	City, State ZIP	Telephone	E-Mail
Section VII:				
Do you have any other information that you think is relevant to the investigation of your complaint? (Attach additional sheets, if necessary.)				

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required, below:

Signature

Date



APPENDIX D: MSY Four Factor Report Findings

FRAMEWORK & METHODOLOGY

This Four Factor Analysis is the first step in understanding the current need for providing meaningful access to federally funded programs for LEP persons. The Four Factor Analysis completed for the Louis Armstrong New Orleans International Airport addresses the following:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by MSY services and programs;
- Factor 2: The frequency with which LEP persons come into contact with MSY services and programs;
- Factor 3: The nature and importance of MSY services and programs in people's lives; and
- Factor 4: The resources available to MSY for LEP outreach, as well as the costs associated with the outreach.

LANGUAGE ASSISTANCE NEEDS ASSESSMENT

This assessment outlines the factors used to identify a person who may require language assistance. MSY is committed to providing services and resources to people who may need language assistance. Overall, the findings of the Four Factor Analysis offer support and understanding required to guide the ongoing development and implementation of the Airport's LEP program and policy in compliance with FAA and Title VI guidelines.

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by MSY services and programs

Factor 1 considers the number and proportion of LEP populations in the MSY service area. The greater the number or proportion of LEP persons in the service area, the more likely language services will be needed. US Census and American Community Survey (ACS) demographic information for the New Orleans MSA region helps to determine:

- Who will be excluded without efforts to remove language barriers?
- How can the Airport determine the LEP population in its service area, if any?

The MSY Airport is located twelve miles outside of New Orleans in southeastern Louisiana, two miles outside of the southwestern Louisiana city of New Orleans, and is located in Jefferson Parish. The city of New Orleans is the largest in the state of Louisiana. The 2020 U.S. Census estimates the total population to be approximately 384,000.¹ The population of the broader New Orleans Metropolitan Statistical Area (MSA) is approximately 1.27 million people.² The eight-parish MSA includes Orleans, Jefferson, Plaquemines, St. Bernard, St. Charles, St. James, St. John the Baptist, and St. Tammany. This analysis considers population estimates of the city and region as relevant to understanding those eligible to be served or likely to encounter MSY services and programs.

¹ U.S. Census Bureau, 2020 Census of Population and Housing, updated every 10 years. [Decennial Census by Decades](#)

² U.S. Census Bureau, Resident Population in New Orleans-Metairie, LA (MSA)



According to MSY's publicly available air traffic statistics for the year ending December 31, 2019, there were 6,832,401 and 6,812,265 passenger enplanements and deplanements, respectively, serving over 13.6 million passengers, year to date in 2019. Approximately 215,000 were international scheduled passengers, and about 3,000 were international charter passengers.

The American Community Survey provides key projections related to Limited English Proficiency for the New Orleans MSA. A person with Limited English Proficiency (LEP) is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak, and understand English. In general, the greater number or proportion of LEP persons in a service area, the more likely language services will be needed. The population of the New Orleans MSA is approximately 8% foreign-born persons. Nearly 88% of households in the service area are English only speaking, as shown in Table 2 below. The 2019 American Community Survey (ACS) five year estimates show about 7.2% of households speak Spanish, 2.5% Other Indo-European, 1.9% Asian & Pacific Island, and 0.6% other languages.

Table 1 displays limited English speaking households for the MSY service area, which has been defined as the New Orleans MSA. ACS projections indicate that approximately 3% of all households are limited English speaking. For those LEP relevant persons (3% of households), approximately:

- 31.6% Asian & Pacific Island languages
- 28.9 % speak Spanish
- 10.5% Other Indo-European languages, and
- 10.5% speak other languages

Table 1 provides additional details on limited English speaking households for the New Orleans MSA population based on 5-Year ACS projections (2015-2019).

Table 1 Limited English Speaking Households

New Orleans-Metairie, LA Metro Area								
	Total		Percent		Limited English-speaking households		Percent limited English-speaking households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
All households	482,358	±2,104	(X)	(X)	14,596	±790	3.0%	±0.2
Households speaking --								
Spanish	34,898	±952	7.2%	±0.2	10,101	±610	28.9%	±1.8
Other Indo-European languages	12,258	±715	2.5%	±0.1	1,292	±291	10.5%	±2.2
Asian and Pacific Island languages	9,113	±438	1.9%	±0.1	2,877	±378	31.6%	±3.7
Other languages	3,100	±413	0.6%	±0.1	326	±153	10.5%	±4.6

Source: 2019 American Community Survey 5-Year Estimates

Table 2 provides a break down on the household languages by LEP status for the New Orleans MSA population, based on 2019 ACS 1-Year projections. Approximately 88.07% of households are identified as English only speaking. Table 2 provides further insight regarding the percentage of households that speak



languages other than English, and households that are limited English speaking. For example, while nearly 32,000 households are estimated to speak Spanish, only 1.72% were identified as limited English speaking.

Table 2 Household Languages by Household Limited English Speaking Status

New Orleans-Metairie, LA Metro Area			
	Estimate	Margin of Error	% of Total Households
All households	485,267	±4,407	
English only	427,384	±5,352	88.07%
Spanish:	31,983	±2,635	6.59%
Limited English speaking household	8,338	±1,971	1.72%
French, Haitian, or Cajun:	6,795	±1,338	1.40%
Limited English speaking household	478	±263	0.10%
German or other West Germanic languages:	1,415	±452	0.29%
Limited English speaking household	0	±224	0.00%
Russian, Polish, or other Slavic languages:	710	±341	0.15%
Limited English speaking household	52	±83	0.01%
Other Indo-European languages:	3,958	±1,088	0.82%
Limited English speaking household	573	±513	0.12%
Korean:	288	±176	0.06%
Limited English speaking household	141	±122	0.03%
Chinese (incl. Mandarin, Cantonese):	1,541	±746	0.32%
Limited English speaking household	559	±443	0.12%
Vietnamese:	5,148	±882	1.06%
Limited English speaking household	1,168	±551	0.24%
Tagalog (incl. Filipino):	518	±331	0.11%
Limited English speaking household	168	±141	0.03%
Other Asian and Pacific Island languages:	1,674	±703	0.34%
Limited English speaking household	580	±491	0.12%
Arabic:	2,882	±1,126	0.59%
Limited English speaking household	430	±465	0.09%
Other and unspecified languages:	971	±458	0.20%
Limited English speaking household	77	±135	0.02%

Source: 2019 American Community Survey 1-Year Estimates

The Census Bureau further defines households as linguistically isolated* when there are no members age 14 years and over who speak only English or who speak a non-English language and speak English “very well”. In other words, all members of the household ages 14 years and over have at least some difficulty with English. Therefore, a number of those speaking a language other than English may also be considered linguistically isolated. Overall, Table 3 indicates that, of the 11.1% of the population estimated to speak a language other than English, about 43.1% speak English less than “very well”.

Table 3 Languages Spoken at Home

New Orleans-Metairie, LA Metro Area												
	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	1,188,773	±247	(X)	(X)	1,131,958	±1,877	95.2%	±0.2	56,815	±1,846	4.8%	±0.2
Speak only English	1,056,816	±2,572	88.9%	±0.2	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	131,957	±2,595	11.1%	±0.2	75,142	±2,208	56.9%	±1.2	56,815	±1,846	43.1%	±1.2

LOUIS ARMSTRONG NEW ORLEANS INTERNATIONAL AIRPORT
TITLE VI AND NON-DISCRIMINATION PLAN



New Orleans-Metairie, LA Metro Area												
	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	79,470	±1,946	6.7%	±0.2	42,728	±1,505	53.8%	±1.5	36,742	±1,520	46.2%	±1.5
5 to 17 years old	14,976	±734	1.3%	±0.1	10,990	±664	73.4%	±3.0	3,986	±503	26.6%	±3.0
18 to 64 years old	56,315	±1,534	4.7%	±0.1	27,397	±1,238	48.6%	±1.7	28,918	±1,182	51.4%	±1.7
65 years old and over	8,179	±454	0.7%	±0.1	4,341	±409	53.1%	±4.4	3,838	±432	46.9%	±4.4
Other Indo-European languages	20,875	±1,485	1.8%	±0.1	16,053	±1,182	76.9%	±2.4	4,822	±641	23.1%	±2.4
5 to 17 years old	3,145	±546	0.3%	±0.1	2,647	±471	84.2%	±5.0	498	±186	15.8%	±5.0
18 to 64 years old	12,477	±1,028	1.0%	±0.1	9,598	±841	76.9%	±2.8	2,879	±438	23.1%	±2.8
65 years old and over	5,253	±544	0.4%	±0.1	3,808	±373	72.5%	±4.7	1,445	±339	27.5%	±4.7
Asian and Pacific Island languages	24,593	±1,094	2.1%	±0.1	11,416	±842	46.4%	±3.1	13,177	±1,017	53.6%	±3.1
5 to 17 years old	3,481	±407	0.3%	±0.1	2,520	±372	72.4%	±6.0	961	±229	27.6%	±6.0
18 to 64 years old	18,136	±849	1.5%	±0.1	8,113	±688	44.7%	±3.5	10,023	±854	55.3%	±3.5
65 years old and over	2,976	±254	0.3%	±0.1	783	±171	26.3%	±5.7	2,193	±269	73.7%	±5.7
Other languages	7,019	±950	0.6%	±0.1	4,945	±777	70.5%	±4.6	2,074	±403	29.5%	±4.6
5 to 17 years old	1,398	±423	0.1%	±0.1	1,139	±393	81.5%	±11.1	259	±164	18.5%	±11.1
18 to 64 years old	5,222	±711	0.4%	±0.1	3,535	±573	67.7%	±5.4	1,687	±354	32.3%	±5.4
65 years old and over	399	±133	0.0%	±0.1	271	±117	67.9%	±16.0	128	±72	32.1%	±16.0

Source: 2019 American Community Survey 5-Year Estimates

Data utilized for the MSY Factor 1 assessment includes demographic details on the Airport service area's general population and language use. These files were downloaded from the U.S. Census Bureau website.³

³ The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold, but has some utility for translators or researchers. The simplest collapse recodes languages other than English into four major language groups: Spanish, Other Indo-European languages, Asian and Pacific Island languages, and Other languages. A more detailed collapsing uses 42 non-English languages and language groups. Other Indo-European languages may include those anticipated in the region, including French and German.



Table 4 provides additional details on limited English speaking households for the state of Louisiana population, based on 5-Year ACS projections (2015-2019). Looking beyond the New Orleans MSA service area, approximately 1.7% of all households are limited English speaking.

Table 4 Limited English Speaking Households

Label	Louisiana							
	Total		Percent		Limited English-speaking households		Percent limited English-speaking households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
All households	1,741,076	±11,011	(X)	(X)	30,045	±3,810	1.7%	±0.2
Households speaking --								
Spanish	68,894	±4,295	4.0%	±0.2	18,779	±3,381	27.3%	±4.3
Other Indo-European languages	71,020	±4,527	4.1%	±0.3	5,515	±1,152	7.8%	±1.6
Asian and Pacific Island languages	20,371	±1,996	1.2%	±0.1	4,676	±1,167	23.0%	±5.2
Other languages	7,107	±1,511	0.4%	±0.1	1,075	±764	15.1%	±10.0

Source: 2019 American Community Survey 5-Year Estimates

In addition to estimates from Tables 1-4, MSY targeted local vendors to:

- collect information relevant for outreach to LEP individuals or communities interacting with the airport,
- determine language barriers and or literacy skills of LEP populations, and
- ascertain whether LEPs are underserved.

Polls were conducted using a telephone questionnaire to request input regarding knowledge of LEP populations within the MSY area. The results of the telephone poll questionnaires suggest LEP populations are located in the region and regularly interact with the airport and its services.

Respondents primarily noted specific, limited interactions with non-English speaking persons, Airport tourists from varying international backgrounds, and professionals traveling in the region. Most of the respondents noted the tendency for a minimum to advanced proficiency in English during these interactions. The survey was also intended to help determine the number and proportion of LEP persons interacting with vendors located at the MSY airport, and also identify any areas where these persons may face language barriers or exclusion. Polls also determined that most LEP persons may be served directly or indirectly within MSY through a range of formal and informal resources such as the Airport's language line, bilingual Airport personnel, or customer service.

- Factor 2: The frequency with which LEP persons come into contact with MSY services and programs

Factor 2 considers the frequency of contact between LEP persons and the Airport's services. The more frequent the contact between the services and the LEP population, the more likely the need for enhanced language services. The Census and ACS data will not capture non-resident LEP persons who access airport services (e.g. tourists, layover passengers), so the frequency of contact between LEP persons and MSY services is further determined by data collection from MSY stakeholders.



The analyses comprising Factor 1's finding indicate that approximately 3% of all households are limited English speaking within the service area, and 1.7% within the state of Louisiana based on recent ACS estimates. An assessment of the frequency of interactions was completed using phone interviews with those likely to have considerable direct contact with the airport's program, staff, and populations served. The poll of MSY stakeholders included outreach, such as:

- Airport Lost & Found
- Wheelchairs & Porters
- Ground transportation/taxi services
- Airline carriers
- Car Rental vendors
- Airport clubs
- Food & Beverage
- Gifts & News

The goal of polling was to determine the frequency of contact between LEP persons and the airport sponsor's services. Outreach to airport stakeholders collected:

- Any outreach to LEP to determine how they access airport programs
- Staff experience with LEP
- Inventory LEP interactions with airport program

MSY serves persons with minimum to advanced proficiency in English, and a relatively seasonal number of persons who may also command a language other than English at home or speak English less than very well, relying primarily upon Spanish, other Indo-European, Asian & Pacific Islander, and other Languages. Those surveyed were asked a series of questions, including:

- How often do you interact with someone with limited English proficiency using your services at the airport?
- If your business has interactions with LEP folks using or attempting to use your services at MSY, how common is it? As frequent as daily, weekly, once a month, or infrequent?
- What types of folks do you interact with who may have limited command of English? What languages do they rely on to communicate (Spanish, Vietnamese, other)?

Overall, most MSY respondents indicated at least weekly to several times a week for occurrence of engaging with LEP persons (which could increase to daily during seasonal travel periods).

- Factor 3: The nature and importance of MSY services and programs in people's lives.

Factor 3 considers the importance of the services provided by the Airport. The more important the activity or service or the greater consequences of the contact to the LEP persons, the more likely language services are needed. In essence, if a delay or denial of access to a particular service could have serious health or life threatening implications, it is probably "important". Federal guidance states: "Transportation is considered an essential service to participation in modern society."



All of MSY's services and programs are important in providing connections that improve people's lives. MSY's attention and attentiveness to LEP populations is of significant importance to its delivery of services. LEP populations directly come into contact with MSY and its providers. The Airport's customer service desk, ground transportation services, terminal retail, services, tenants, and emergency services personnel are most likely to interact with LEP populations. Compliance with FAA guidelines stated in Title VI of the Civil Rights Act of 1964 protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have Limited English Proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

FAA guidance states: "Transportation is considered an essential service to participation in modern society". In essence, if a delay or denial of access to a particular service could have serious health or life threatening implications, it is probably "important". Air travel should be deemed an important service provided by the airport and its sponsors, however.

Polling airport vendors attempted to determine how LEP populations use MSY services, and staff experiences in service at the airport. MSY should continue to provide publications and other materials disseminated to the public regarding services and programs in both English and Spanish, striving to provide alternative but meaningful accessibility to all LEP populations. It is notable that many respondents indicated that MSY has many individuals throughout the airport who voluntarily offer translation, interpretation and assistance during interactions with LEP persons. MSY should continue to evaluate its programs, services, and activities to ensure that persons who may be LEP are provided with meaningful access, particularly if such contact continues to increase or as described by respondents.

- Factor 4: The resources available to MSY for LEP outreach, as well as the costs associated with the outreach.

Factor 4 considers resources available to the Airport and costs. The Airport's budget, level of resources, and the costs imposed may have an impact on the nature of steps taken in providing meaningful access for LEP persons needed to provide the same level of language assistance as larger airports with greater resources.

The MSY airport sponsor should maintain resources available to ensure compliance with FAA guidelines on serving LEP populations and require compliance from all vendors and providers within MSY. MSY's level of resources and the costs imposed may have an impact on the nature of steps taken in providing meaningful access for LEP persons. These resources should be adequate to provide the same level of language assistance as larger airports with greater resources.

The Airport will determine if a formal budget is needed specifically for sustaining compliance in its provision of LEP services. The development of a current Plan should identify appropriate allocations.



Resources should be kept available to MSY for:

- LEP outreach & associated costs
- Materials created & translated in a format easily understood by Spanish, Vietnamese, and (Other) speaking populations
- Translation and interpretation of materials or alternative formats as needed
- Capacity to contract with interpretation firms to aid in the provision of services
- Enlisting internal resources and available bilingual staff to assist with interpretation

Currently, approximately 14,596 households across the 8-parish area, or 3%, are classified limited English speaking, and 56,815 people are identified as not speaking English very well. These regional residents, along with a national and international traveler community utilizing MSY's services represent a sizable number of those who may be interacting with MSY or who could be likely to do so in the future. The Airport currently has LEP resources available that include the following:

All terminal wayfinding signage within the Louis Armstrong New Orleans International Airport is in English and includes the standard aviation international symbols as described in:

- FAA Advisory Circular AC 150/5360-12F
- Airport Signing and Graphics and Airport Cooperative Research Program (ACRP) Report 52
- Wayfinding and Signing Guidelines for Airport Terminals and Landside

Louis Armstrong New Orleans International Airport provides accessibility and language support on its website at www.flymsy.com:

- It enables visitors to customize their experience to best suit their individual needs
- Those with a disability, learning difficulty, low visual impairment, or speak English as a second language, can access information barrier-free
- The toolbar includes a variety of features, such as:
 - a screen reader
 - reading aids
 - fully customizable styling options, and
 - a translation tool with over 107 languages

The Airport Communications Center (AVCOM) at the Louis Armstrong International Airport has an active account with Language Line:

- Language Line offers over 240 languages on-demand through 14,000 professional interpreters



The Airport Customer Service Department has several team members that are bi-lingual with the second language being Spanish:

- They are available from 4am until 8pm daily
- Additionally, many of the janitorial employees speak Spanish and are able to assist within the terminal

For general language assistance, many staff members have turned to Google Translate to provide basic information on directing persons through the facility and helping them to find basic location

The Airport aims to identify LEP Populations through intentional outreach to the local community to understand the cultural environment within its service area. These resources also assist the airport in providing notice to LEP populations by posting information about the Airport's language assistance services, advertising, marketing and formal communication, including the MSY website. The Airport provides interpretation by utilizing bilingual personnel, community volunteers, and through providing interpretation services with on demand translation line service. The MSY Airport also provides translation by using universal symbols and pictograms where appropriate throughout its new North Terminal, as well as translated documents upon request and related to outreach efforts.

In addition to options listed above, the Airports now also provides translated written materials within its public facing website and will be developing additional Title VI training for all Airport personnel. These limited LEP measures should be reasonable given the resources available to MSY.

The airport is committed to compliance with its LAP/LEP program and policy in accordance with FAA and Title VI guidelines. Information collected and provided on LEP persons at the MSY may include, but not be limited to:

- Changes in LEP population by number or area as new information is made available
- Updated analysis of the current LEP service area
- Requirements for additional language translation services
- Updates to policies and procedures

The Airport will develop appropriate steps, measures and programs based on the information captured in the Four Factor Analysis, which will be reflected in its Title VI Program and LAP Plan.



APPENDIX E: Language Assistance Plan

INTRODUCTION

According to MSY's publicly available air traffic statistics for the year ending December 31, 2019, there was an estimated 6,832,401 and 6,812,265 passenger enplanements and deplanements, respectively, serving over 13.6 million passengers year to date in 2019. Approximately 215,000 were international scheduled passengers, and about 3,000 were international charter passengers.

The Louis Armstrong New Orleans International Airport (MSY) is ranked as the number one large airport in North America for customer satisfaction based on J.D. Power's 2021 North America Airport Satisfaction Study, which was released on Sept. 22. MSY's number one ranking represents significant improvement from number 11 in 2020 and number 23 in 2019. In the large airport category of 10 to 32.9 million passengers per year, MSY achieved a score of 844 based on a 1,000-point scale.

As a result of a deliberate focus on streamlining operations and improving the customer experience, MSY now boasts the following recent accolades in addition to the number one J.D. Power ranking:

- Named the most efficient airport in North America among airports serving 5-15 million passengers per year by the Air Transport Research Society (ATRS).
- Ranked number 3 Best Large Airport by USA Today's 2021 10Best Reader's Choice Award Poll.
- Awarded Best Hygiene Measures in North America by Airports Council International World's 2020 ASQ Program.
- MSY achieved GBAC Star Facility Certification in 2020, which demonstrates a commitment to providing a clean and healthy facility for all who come to the Airport.
- Director of Aviation, Kevin Dolliole, was named Airport Experience News' (AXN) 2020 Director of the Year in the medium airports category and Biz New Orleans magazine's 2019 CEO of the Year.
- Launched MSY Guest Pass program in 2019 allowing non-ticketed visitors access post-security to shop, dine, or visit with family or friends who are traveling.
- Won Best Overall Public Relations Program for Medium Airports during 2020 Airports Council International-North America (ACI-NA) Excellence in Airport Marketing, Communications, and Customer Experience (MarComCX) Awards.
- Public Relations Society of America (PRSA) New Orleans Chapter presented MSY with 5 awards in 2020 for campaigns related to the opening of the terminal and COVID-19 preparations.

This ***Language Assistance Plan*** ("LAP") has been prepared to establish MSY's responsibilities as a recipient of federal financial assistance as it relates to the needs of individuals with limited English proficiency language skills.

BACKGROUND

On August 11, 2000, President Clinton issued Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, indicating that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. The Executive Order directs agencies to publish guidance for their respective recipients clarifying their obligation to ensure that



such discrimination does not take place. The Executive Order also requires federal agencies, and their recipients, to examine the services provided, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so limited English proficient individuals have meaningful access to those services.

Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. The Airport has developed its Language Assistance Plan to direct reasonable steps for providing language assistance to persons with limited English proficiency ("LEP") accessing the airport's services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. The Airport conducted a Four Factor Analysis to identify:

- The number or proportion of LEP individuals in the service area who may encounter or be served by the Airport
- The frequency with which LEP individuals come in contact with Airport services
- The nature and importance of services provided by the Airport to the LEP population, and
- The resources available to the Airport and overall cost to provide LEP assistance

Overall, the findings of the Four Factor Analysis offer support and understanding required to guide the ongoing development and implementation of the Airport's LEP program and policy in compliance with FAA and Title VI guidelines. These findings have been considered in the outlined LAP.

MSY LANGUAGE ASSISTANCE PLAN

The following language assistance goals maintain the Airport's commitment to effective communication and access for all persons:

- **Providing language interpretation**
- **Notifying LEP customers of language assistance services**
- **Translating vital documents**
- **Training Airport staff and personnel**
- **Monitoring and evaluating access to language assistance**

Providing Language Interpretation

MSY takes reasonable steps to provide language interpretation resources to LEP persons, including: MSY personnel with fluency in or a working knowledge of various languages to assist LEP persons with oral interpretation. The customer service agents at MSY utilize language translation through technological tools, including a language line and Google translate. The Airport's phone translation services are available to LEP customers; those persons can directly communicate through translators that speak the LEP person's requested language.

The Airport Communications Center (AVCOM) at the Louis Armstrong International Airport has an active account with Language Line:

- Language Line offers over 240 languages on-demand through 14,000 professional interpreters



The Airport Customer Service Department has several team members that are bi-lingual with the second language being Spanish:

- They are available from 4am until 8pm daily
- Additionally, many of the janitorial employees speak Spanish and are able to assist within the terminal

The Airport translates public notices and media to inform local residents about Airport services and activities, particularly in Spanish and Vietnamese. For public meetings that may be in local areas with a known concentration of LEP persons, efforts are made to have meeting notices, fliers, advertisements and agendas printed in Spanish and Vietnamese, interpreter services is another tool utilized for effective communication and interaction with LEP communities and individuals.

Notifying LEP customers of language assistance services

The Airport has a variety of resources to notify the public about available LEP services and resources. The MSY customer services and information areas of the Airport can access over 240 languages available on the phone translation. Many Airport personnel throughout the terminal also can provide translation services to travelers. The Airport provides notice about available language assistance in the terminal. The Airport website also includes translation capabilities for various languages, including Spanish, German, Arabic, Chinese to ensure all can access vital travel information about airport services, including ground transportation information, traveling to the airport, monetary exchange locations and maps of airport amenities.

Translating vital documents

The Airport reviews documents for potential translations in order to assure vital information is translated for LEP persons. This includes identifying and using feedback from the Airport's personnel, customer surveys, and general federal compliance requirements related to LEP translation.

Louis Armstrong New Orleans International Airport provides accessibility and language support on its website at www.flymsy.com:

- It enables visitors to customize their experience to best suit their individual needs
- Those with a disability, learning difficulty, low visual impairment, or speak English as a second language, can access information barrier-free
- The toolbar includes a variety of features, such as:
 - a screen reader
 - reading aids
 - fully customizable styling options, and
 - a translation tool with over 107 languages



Training Airport staff and personnel

The Airport will ensure that all employees are trained during the new employee orientation training and badging process sessions and biannually in its LAP and how to assist LEP persons throughout MSY. Title VI and LAP requirements and reference materials will also be available on the MSY website. This training will include the following elements:

- Title VI provisions
- information about the MSY LAP
- how to assist with communication to LEP passengers
- MSY phone interpreter services that can assist LEP passengers
- Any new services for LEP passengers are explained and/or demonstrated
- MSY and FAA nondiscrimination complaint procedures and reporting
- Aviation staff will be continually encouraged to attend workshops and training designed to highlight cultural diversity and meet language assistance needs, including the DBE Office personnel

Monitoring and evaluating access to language assistance

The Airport will annually evaluate the LAP and its components, addressing questions such as:

- How many LEP persons utilized the phone translation service, and what languages were most commonly used?
- What new information is available that further informs us about the demographics and languages spoken by the travelers using MSY?
- Has there been a need realized for additional information to be provided in other languages?
- Has there been a change in the international airline services provided at MSY?

LAP PLAN DISSEMINATION

The MSY LAP will be posted on the Airport website. A copy of the LAP will be available at the Airport DBE Office and designated Title VI Program staff.