

**TULSA AIRPORTS IMPROVEMENT TRUST  
TITLE VI DISCRIMINATION COMPLAINT PROCEDURE**

These procedures are for complaints of discrimination, other than employment discrimination by TAIT. They apply to discrimination by airport employees, contractors, concessionaires, lessees, or tenants of the Airport, or at Airport facilities based upon race, creed, color, national origin, or gender, 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 TAIT.

Any person who feels that he or she has been subjected to discrimination on the basis of race, creed, color, national origin, or gender 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.

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

Tulsa Airports Improvement Trust, Title VI Coordinator / HR Director  
7777 E. Apache, A-217  
Tulsa, OK 74115

If a complaint is initially made by phone by calling 918-838-5000, it must be supplemented with a written complaint within 90 days after the discriminatory event. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability. A copy of complaints alleging what amounts to a Title VI violation by airport employees, contractors, concessionaires, lessees, or tenants, relative to the airports aviation activities, will be forwarded to the FAA. For information on filing a complaint with DOT/FAA contact the individual named above. The Title VI Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible. The Title VI Coordinator will issue a written decision.

## **DISCRIMINATION COMPLAINT REFERRAL AND INVESTIGATION INTERNAL PROCEDURES**

### **Introduction**

Scope. These procedures are for complaints of discrimination, other than employment discrimination by TAIT. They apply to discrimination by airport employees, contractors, concessionaires, lessees, or tenants based upon race, creed, color, national origin, or gender, 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 TAIT.

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 will endeavor to avoid interfering with the FAA investigation, will cooperate with the FAA when possible, and will share factual information with the FAA.

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. Prompt Resolution of Disputes. The Title VI Coordinator will quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through any or all of the following means: negotiation, mediation, alternate dispute resolution.

Avoiding Future Discrimination. In addition to taking action with respect to any specific instances of discrimination, TAIT will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. TAIT employees will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

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 complaint due to a disability.

### **Procedures**

Initial Receipt of Written Complaint. Title VI Coordinator will log in the complaint and promptly send copies of the complaint to the director of the office named in the complaint and the Airports Director.

Assignment of Investigator. The Title VI Coordinator will immediately begin the investigation or designate an investigator.

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.

Contact with Complainant. The Title VI Coordinator should meet with the complainant to clarify the issues and obtain additional information.

Investigation Report. After completing the investigation, the Title VI Coordinator will prepare a written report.

Consultation with Legal Counsel. In every case, the Title VI Coordinator will consult with TAIT Legal Counsel regarding the investigation and the 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 Airports 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 Airports Director will issue a final written decision in response to the appeal.

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.