



SAN ANTONIO AIRPORT SYSTEM

Title VI Complaint Procedures

Introduction

The San Antonio International Airport (SAT), as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination or retaliation under any federally or non-federally funded City programs or activities administered by the City or its contractors on the basis of race, color or national origin.

This policy establishes a procedure by which persons may file a complaint alleging discrimination in SAAS' provision of services, administration of programs, or activities. These prohibitions extend from the San Antonio Airport System, as a direct recipient of federal financial assistance, to its sub-recipients (e.g., contractors, consultants, local governments, colleges, universities, etc.). All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements. The Civil Rights Restoration Act of 1987 extended this to all programs within an agency that receives federal assistance regardless of the funding source for individual programs.

This policy is intended to establish a procedure under which complaints alleging discrimination in SAAS' provisions, services, or SAT activities can be made by persons who are not employees of SAAS.

Any person who believes SAAS, or any entity who receives federal financial assistance from or through SAT (i.e., sub-recipients, sub-contractors, or sub-grantees), has subjected them or any specific class of individuals to unlawful discrimination may file a complaint of discrimination.

SAAS will follow timelines set forth in guidance from the Department of Transportation, the Federal Highway Administration, Federal Transit Administration and the Department of Justice for processing Title VI discrimination complaints.

When to File

A complaint of discrimination must be filed within **180 calendar days** of the alleged act of Discrimination, or discovery thereof; or where there has been a continuing course of conduct, the date on which that conduct was discontinued. Filing means a written complaint must be postmarked before the expiration of the **180-day period**. The filing date is the day you complete, sign, and mail the complaint form. The complaint form and consent/release form must be dated and signed for acceptance. Complaints received more than **180 days** after the alleged discrimination will not be processed and will be returned to the complainant with a letter explaining why the complaint could not be processed and alternative agencies to which a report may be made.

Where to File

In order to be processed, signed original complaint forms must be mailed or hand delivered to:
San Antonio Airport System
Title VI Coordinator
Terminal A Mezzanine
9800 Airport Blvd.
San Antonio, TX 78216

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or limited-English proficiency. A complaint may also be filed by a representative on behalf of a complainant.

Persons who are not satisfied with the findings of SAAS may seek remedy from other applicable state or federal agencies.

Required Elements of a Complaint

In order to be processed, a complaint must be in writing and contain the following information:

- Name, address, and phone number of the complainant.
- Name(s) and address(es) and business(es)/organization(s) of person(s) who allegedly discriminated.
- Date of alleged discriminatory act(s).
- Basis of complaint (i.e., race, color, national origin, sex, age, religion, or disability). A
- statement of complaint.
- Signed consent release form.

Incomplete Complaints

Upon initial review of the complaint, the Title VI Specialist will ensure that the form is complete and that any initial supporting documentation is provided. Should any deficiencies be found, the Title VI Specialist will notify the complainant within **10 business days**. If reasonable efforts to reach the complainant are unsuccessful or if the complainant does not respond within the time specified in the request (30 days), the recipient may close the complainant's file. The complainant may resubmit the complaint provided it is filed within the original **180-day period**.

Should the complaint be closed due to lack of required information, SAAS will notify the complainant at their last known address. In the event the complainant submits the missing information after the file has been closed, the complaint may be reopened provided it has not been more than **180 days** since the date of the alleged discriminatory action.

Records of Complaints

The Title VI Specialist will keep a record of all complaints received. The log will include such information as:

- Basic information about the complaint such as when it was filed, who filed it, and who it was against.
- A description of the alleged discriminatory action.
- Findings of the investigation.

Complaint Process Overview

The following is a description of how a discrimination complaint will be handled once received by SAAS.

1. A complaint is received by SAAS:

Complaints must be in writing and signed by the complainant or their designated representative. If the complainant is unable to complete the form in writing 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. Complainants wishing to file a complaint that do not have access to the Internet or the ability to pick up a form will be mailed a complaint form to complete. The complainant will be notified if the complaint form is incomplete and asked to furnish the missing information.

2. Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 48 hours.

3. Complaint is logged into tracking database:

Completed complaint forms will be logged into the complaint tracking database; basic data will be maintained on each complaint received.

4. Determine jurisdiction:

SAT's Title VI Specialist will complete an initial review of the complaint. The purpose of this review is to determine if the complaint meets basic criteria.

Criteria required for a complete complaint:

- Basis of alleged discrimination (i.e., race, religion, color, national origin, sex, age or disability).
- Determination of timeliness will also be made to ensure that the complaint was filed within the **180 day** time requirement.
- The program in which the alleged discrimination occurred will be examined to ensure that the complaint was filed with the appropriate agency. During this process, if a determination is made in which the program or activity that the alleged discrimination occurred is not related to a SAAS program or activity, every attempt will be made to establish the correct agency. Whenever possible and assuming consent was granted on the Consent/Release form, the complaint will be forwarded to the appropriate agency.

5. Initial written notice to complainant:

Within **10 business days** of the receipt of the complaint, SAAS will send notice to the complainant confirming receipt of the complaint; if needed the notice will request additional information, notify complainant that the activity is not related to a SAAS program or activity, or does not meet deadline requirements. Conclusions made in step four will determine the appropriate response to the complaint. Examples of response letters are located in Appendix A. If any additional information is needed from the complainant, it will be communicated at this point in the process. A copy of the written response, as well as the complaint form, will be forwarded to the U.S. Department of Transportation, Federal Aviation,

6. Investigation of complaint:

The Title VI specialist will confer with the Department's Deputy Director to determine the most appropriate fact-finding process to ensure that all available information is collected in an effort to reach the most informed conclusion and resolution of the complaint. The type of investigation techniques used may vary depending on the nature and circumstances of the alleged discrimination. An investigation may include but is not limited to:

- Internal meetings with SAAS staff and legal counsel
- Consultation with state and federal agencies.
- Interviews of complainant(s).
- Review of documentation (i.e., planning, public involvement, and technical program activities).
- Interviews and review of documentation with other agencies involved. Review of technical analysis methods
- Review of demographic data

7. Determination of investigation:

An investigation must be completed within **60 days** of receiving the complete complaint, unless the facts and circumstances warrant otherwise. A determination will be made based on information obtained. The Title VI Coordinator, Department Deputy Director and/or designee will render a recommendation for action, including formal and/or informal resolution strategies in a report of findings to the Director of Airports.

8. Notification of determination:

Within **10 days** of completion of an investigation, the complainant must be notified by the Director of Airports of the final decision.

9. Appeal Rights:

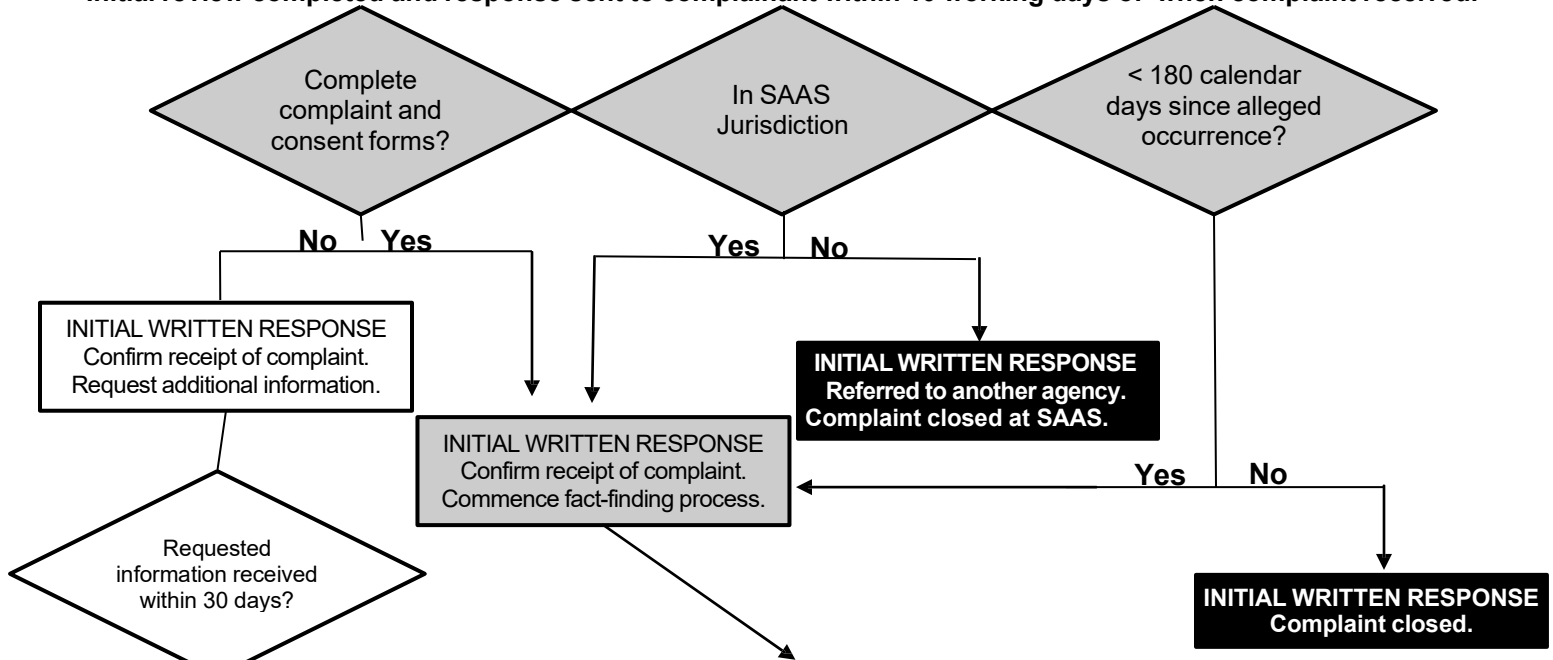
The notification will advise the complainant of his/her appeal rights with state and federal agencies if he/she is dissatisfied with the final decision. The complainant may appeal in writing to the Director of Airports. The written appeal must be received within **5 business days** after receipt of the written decision. The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal. The Director of Airports will issue a final written decision in response to the appeal. A copy of this letter, along with the report of findings, will be forwarded to the U.S. Department of Transportation, Federal Aviation, Office of Civil Rights, and Contract Compliance Section .

RECEIPT OF COMPLAINT

A written discrimination complaint is received and entered into tracking database.

INITIAL REVIEW

Initial review completed and response sent to complainant within 10 working days of when complaint received.

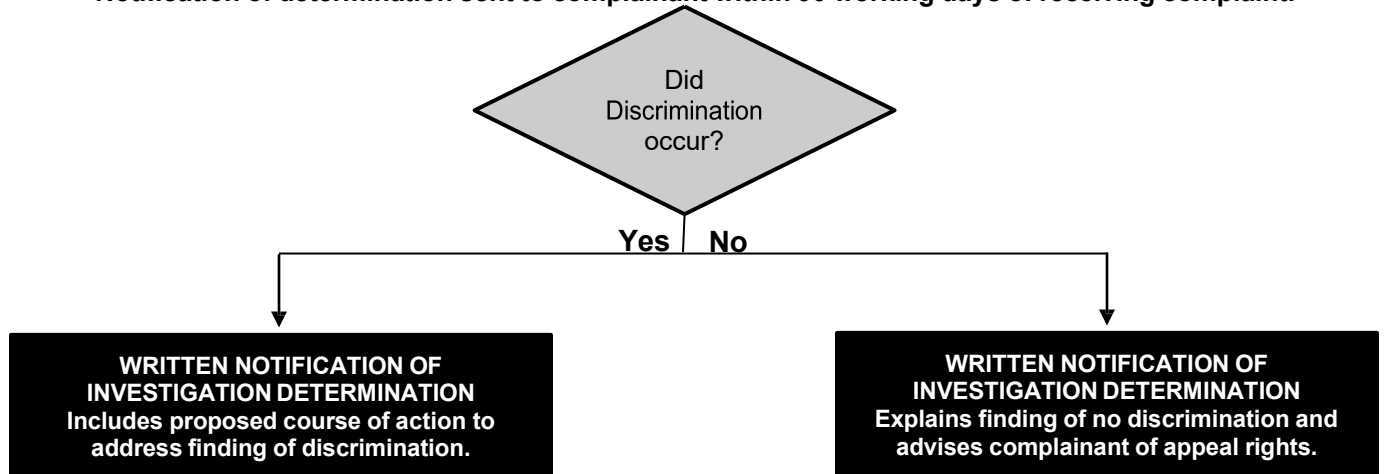


INVESTIGATION / FACT FINDING

Completed within 60 working days of receiving complaint. Findings summarized and report submitted to SAT Director.

DETERMINATION OF INVESTIGATION

Notification of determination sent to complainant within 90 working days of receiving complaint.





San Antonio Airport System Discrimination Complaint Form

Please read the information on this page of this form carefully before you begin.

As a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, SAAS ensures that no person shall, on the grounds of race, religion, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. These prohibitions extend from the San Antonio Airport System, as a direct recipient of federal financial assistance, to its sub- recipients (e.g., contractors, consultants, local governments, colleges, universities, e t c .). All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements.

SAAS is required to implement measures to ensure that persons with limited-English proficiency or disability have meaningful access to the services, benefits and information of all its programs and activities under Executive Order 13166. Upon request, assistance will be provided if you are limited-English proficient or disabled. Complaints may be filed using an alternative format if you are unable to complete the written form.

The filing date is the day you complete, sign, and mail this complaint form. Your complaint must be filed no later than **180 calendar days** from the most recent date of the alleged act of discrimination. The complaint form and consent/release form must be dated and signed for acceptance. You have **30 calendar days** to respond to any written request for information. Failure to do so will result in the closure of the complaint.

Submit the forms by mail to:

San Antonio Airport System
Title VI Coordinator
9800 Airport Blvd.
San Antonio, TX 78216
Or hand delivered to:
9800 Airport Blvd,
Terminal A Mezzanine Level
San Antonio, TX 78216

If you have any questions or need additional information, please call (210)207-SAIA or e-mail BODD@sanantonio.gov.



San Antonio Airport System Discrimination Complaint Form

Please read the information on this page of this form carefully before you begin.

1

First Name _____ MI _____ Last Name _____

Street Address _____ City _____ State _____ Zip Code _____

Telephone Number _____ e-mail Address _____

2 Who do you believe discriminated against you?

First Name _____ MI _____ Last Name _____

Name of Business/Organization _____ Position/Title _____

Street Address _____ City _____ State _____ Zip Code _____

Person's Relationship to You _____

3 When did the alleged act(s) of discrimination occur?

Please list all applicable dates in mm/dd/yyyy format.

Date(s): _____

Is the alleged discrimination ongoing? Yes No

4 Where did the alleged act(s) of discrimination occur? (Attach additional pages as necessary.)

Name of Location _____

5 Indicate the basis of your grievance of discrimination.

Race: Color:

National Origin: Sex:

Age: Disability:

Religion:

6 Describe in detail the specific incident(s) that is the basis(es) of the alleged discrimination. Describe each incident of discrimination separately. Attach additional pages as necessary.

Please explain how other persons or groups were treated differently by the person(s)/ agency that discriminated against you.

Please list and describe all documents, e-mails, or other records and materials pertaining to your complaint.

Please list and identify any witness(es) to the incidents or persons who have personal knowledge of information pertaining to your complaint.

Have you previously reported or otherwise complained about this incident or related acts of discrimination? If so, please identify the individual to whom you made the report, the date on which you made the report, and the resolution. Please provide any supporting documentation.

Please provide any additional information about the alleged discrimination.

7 If an advisor will be assisting you in the complaint process, please provide his/her name and contact information.

First Name	MI	Last Name
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Name of Business	Position/Title	Telephone Number
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Street Address	City	State	Zip Code
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8 This complaint form must be signed and dated in order to address your allegations. Additionally, this office will need your consent to disclose your name, if needed, in the course of our investigation. The Discrimination Complaint Consent/Release form is attached. If you are filing a complaint of discrimination on behalf of another person, our office will also need this person's consent.

I certify that to the best of my knowledge the information I have provided is accurate and the events and circumstances are as I have described them. I also understand that if I will be assisted by an advisor, my signature below authorizes the named individual to receive copies of relevant correspondence regarding the complaint and to accompany me during the investigation.

Signature

Date



San Antonio Airport System Discrimination Complaint Consent/Release Form

Please read the information on this form carefully before you begin.

First Name	MI	Last Name	
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Street Address	City	State	Zip Code
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As a complainant, I understand that in the course of an investigation it may become necessary for the San Antonio Airport System (SAAS) to reveal my identity to persons at the organization or institution under investigation. I am also aware of the obligations of the San Antonio Airport System (SAAS) to honor requests under the Freedom of Information Act. I understand that as a complainant I am protected from retaliation for having taken action or participated in action to secure rights protected by nondiscrimination statutes and regulations which are enforced by the Federal Aviation Administration (FAA) of the U.S. Department of Transportation.

Please check one:

- I CONSENT and authorize SAAS, as part of its investigation, to reveal my identity to persons at the organization, business, or institution, which has been identified by me in my formal complaint of discrimination. I also authorize SAAS to discuss, receive and review materials and information about me from the same and with appropriate administrators or witnesses for the purpose of investigating this complaint. In doing so, I have read and understand the information at the beginning of this form. I also understand that the material and information received will be used for authorized civil rights compliance activities only. I further understand that I am not required to authorize this release and do so voluntarily.
- I DENY CONSENT to have the San Antonio Airport System (SAAS), reveal my identity to persons at the organization, business, or institution under investigation. I also deny consent to have SAAS disclose any information contained in the complaint with any witnesses I have mentioned in the complaint. In doing so, I understand that I am not authorizing SAAS to discuss, receive, nor review any materials and information about me from the same. In doing so, I have read and understand the information at the beginning of this form. I further understand that my decision to deny consent may impede this investigation and may result in the unsuccessful resolution of my case.

Signature

Date