

## Jackson County Airport Title VI Plan

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

Jackson County, by and through its Jackson County Airport Department (JCAD), is committed to ensuring that no person shall on the grounds of race, color, national origin (including limited English proficiency (LEP)), sex (including sexual orientation and gender identity), creed, or age, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), Section 520 of the Airport and Airway Improvement Act of 1982, and related authorities (hereafter, “Title VI and related requirements”), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives U.S. Department of Transportation (DOT) funding. Title VI also prohibits retaliation for asserting or otherwise participating in claims of discrimination.

JCAD further committed to ensuring nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. JCAD is committed to, among other things, understanding the communities surrounding or in its flight paths, as well as customers that use the Rogue Valley International-Medford Airport (“Airport”). Any time communities may be impacted by programs or activities, JCAD will endeavor to take appropriate action to involve them and the general public in the decision-making process.

JCAD requires nondiscrimination assurances, as prescribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Assurances must be included in any related lease, contract, or franchise agreement between JCAD and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Traci Carrier, Director of Finance and Administration, available at (541) 776-7222 and CarrieCD@jacksoncountyor.gov, is responsible for overseeing the Airport Sponsor’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

\_\_\_\_\_  
*Signature*

Danny L. Jordan, County Administrator

\_\_\_\_\_  
Effective Date

[Effective Date plus 3 years]

3-Year Expiration Date

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

## 2. Administration

JCAD has reviewed and adopted this Title VI Plan for the Rogue Valley International - Medford Airport. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the Airport Director’s or Title VI Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by JCAD and resubmittal to FAA.

In addition to the Title VI Coordinator (“Coordinator”) and Airport Director, the following people may assist with JCAD’s Title VI program requirements:

<b>Staff Supporting Title VI Program</b>	<b>Airport Sponsor Program / Office</b>
Carrie Andres	Contract Coordinator
Elizabeth Biddle	Senior Human Resources Consultant
Sherri Camp	Web Administrator
Mike Doil	Economic Manager
Amber Judd	Airport Director
Pete Philbrick	Senior Assistant County Counsel

JCAD has the following airport program sub-recipients:

### **Sub-Recipients**

None
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As of the date of this plan, JCAD has the following pending applications for Federal financial assistance:

<b>Federal Source</b>	<b>Grant Number</b>	<b>Amount</b>
FAA AIP	East Apron Expansion Ph 2; Preliminary-Environmental	\$168,926
FAA AIP	East Apron Expansion Ph 2, Taxiways B2 & B3 Construction	\$6,385,311
FAA AIP	NW Development Taxiway C Ext, Construct Taxilanes NWA & NWB & NW Apron	\$3,703,125

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

<b>Federal Source</b>	<b>Grant Award Information Available at:</b>
FAA AIP / BIL	<a href="https://www.faa.gov/airports/aip/">https://www.faa.gov/airports/aip/</a>

### **3. Grant and Procurement Assurances**

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

JCAD will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/grant\\_assurances/#current-assurances](https://www.faa.gov/airports/aip/grant_assurances/#current-assurances).

#### **Clauses/Covenants**

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See [https://www.faa.gov/airports/aip/procurement/federal\\_contract\\_provisions/](https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/). Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. JCAD requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

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

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Pursuant to the Airport's Contract Templates, Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Contract Coordinator to verify they include the template language, for not less than 10 percent of contractors each year.

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

The Coordinator is responsible for ensuring that JCAD staff and others supporting Title VI are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications.

See Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to JCAD leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.

- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan.

The Coordinator has received access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>).

## **5. Notice**

49 CFR Part 21 Appendix C(b)(2)(ii)

JCAD will conspicuously display the FAA-provided Unlawful Discrimination Poster in public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,<sup>2</sup> and maintained. The poster template is available at [https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/com\\_civ\\_support/non\\_disc\\_pr/](https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/) and a completed copy is attached. See Section 15 Appendix.

JCAD has posted the above Title VI policy statement at its administration office and on its website.

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<sup>2</sup> For more information about website accessibility, please visit ADA.gov.

JCAD will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed within 30 days after FAA approval via email and will be incorporated into the onboarding documents upon an employee’s hire.

Posters are displayed in the terminal and other areas on airport property, including the following public locations:

<b>Terminal/FBO/Concessions/ Other Locations</b>	<b>Quantity in Pre-Security Area</b>	<b>Quantity in Post-Security Area</b>	<b>Additional Quantities</b>
Erickson Air Crane			1
Jet Center			1
Mercy Flights			1
Million Air			1
Roots and Wings			1
Secured Courier			1
Federal Express			1
Tailwinds		1	
Sky House Restaurant	1	1	
In front of Ticket Counters	1		
At 24-hour security station	1		
In secure area near exit hall		1	
In secure area near restrooms		1	
Travel Medford Information Booth	1		

Outreach to Affected Communities

The Title VI Coordinator ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, and posted on the County’s and Airport’s websites. The Title VI Coordinator contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities<sup>3</sup> and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

Detailed information on JCAD’s public notice and outreach procedures is available in JCAD’s Community Participation Plan (“CPP”). A copy of the CPP is available at the JCAD administration office and posted on [the Airport’s website \(www.JacksonCountyOR.gov\)](http://www.JacksonCountyOR.gov) .

<sup>3</sup> We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term “protected communities” is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

To ensure that the community is effectively informed of and able to participate in public hearings, the Title VI Coordinator will display public notices translated into appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include direction for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

## 6. Community Statistics

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the JCAD will be able to identify, understand, and engage with communities. In doing so, the JCAD needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by the JCAD’s Title VI program.

<b>Affected Communities<sup>4</sup></b>	<b>Population</b>
Medford CCD	139,556

(Hereafter, the above communities will be referred to collectively as “the Affected Communities”).

We have identified the following facts about the Affected Communities:

### Low Income Communities<sup>5</sup>

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” JCAD is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, such as [S1701: Poverty Status in the Past 12 Months](#), the overall poverty level for the Medford CCD is approximately 13.9%. The poverty rate remains similar compared with the rest of the county. The poverty rates for the specific Affected Communities are as follows:

<b>Affected Communities</b>	<b>Poverty Rate</b>
Medford CCD	13.9%

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<sup>4</sup> “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

<sup>5</sup> Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low income communities in airport programs and activities.

Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows<sup>6</sup>:

**Affected Community:** Medford CCD  
**Total Affected Community Population:** 139,556

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	106,363	76%
Black or African American	1092	.7%
American Indian or Alaska Native	2014	1.4%
Asian	1882	1.3%
Native Hawaiian or Other Pacific Islander	671	.4%
Hispanic or Latino	23,060	16.5%
More than one	6,829	4.8%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that JCAD communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages<sup>7</sup> that are spoken in LEP households in the Affected Communities. The data source is American Community Survey.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.<sup>8</sup> The safe harbor for JCAD’s community is 1,000. Please refer to the end of this document to find data for all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	5,013	+/-636

**B16001 for the jurisdiction(s) to the end of the plan for reference. See [Table B16001](#):**

<sup>6</sup> Recommend using demographic groups from the U.S. Census.

<sup>7</sup> Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

<sup>8</sup> See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

**Language Spoken at Home by Ability to Speak English]**

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

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

This information is updated annually<sup>9</sup> through checking the following resources:

<b>Data Sources for Languages Spoken in Affected Community</b>	<b>Website link to Data Source</b>
U.S. Census Bureau	<a href="https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001">https://data.census.gov/cedsci/table?q=B16001&amp;tid=ACSDT1Y2019.B16001</a>

**Beneficiary Diversity.**

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

**Description of Beneficiary Demographic Information Collection Methods**

- *The Airport Administration Office annually invites airport guests to voluntarily and anonymously enter demographic information through an online survey.*
- *Businesses that submit bids and participants at small business workshops, pre-bid meetings, and other airport public meetings are asked to voluntarily and anonymously enter demographic information through an online survey.*

**Staff and Advisory Board Diversity.**

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

**Description of Employee and Advisory Board Demographic Information Collection Methods**

- *Annually, employees are asked to submit voluntary confidential demographic information through an online survey.*
- *Every 3 years, airport administration invites advisory committee members to voluntarily and anonymously enter demographic information through an online survey.*

<sup>9</sup> Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period.



## **7. Potential or Known Community Impacts**

Projects or services receiving federal financial assistance have the potential to touch many aspects of American life. Thus, in general, no JCAD activity may have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age without a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.<sup>10</sup>

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

<b>Existing Airport Facilities</b>	<b>Affected Community Impacted by Operation of the Facility</b>
MFR Main Terminal	Medford CCD
MFR Hangar Area	None
MFR Runway 14-32	Medford CCD
Improve Airport Drainage / Erosion Control / Removal Taxiway	None
Extend Taxiway	None
Runway 14-32 Lighting & Seal Coat	None
Expand Apron Phase 1	None

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

<b>Airport Facility Construction Projects</b>	<b>Affected Community Impacted by Construction of the Facility</b>
Extend TW C, Construct Taxilanes, Construct NW Apron	None
Expand GA Apron PH II Western Portion, Realign TW B1 Construct TW B2	None
East Side Circulation Apron	None
Electrical Infrastructure	None
Terminal Expansion	Medford CCD
Corporate Apron Rehabilitation	None

JCAD has analyzed the above existing facilities and facility construction projects for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts:

<sup>10</sup> In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

<b>Facilities or Construction Projects with Disparate Impacts</b>	<b>Affected Community Impacted</b>	<b>Impact Can Be Eliminated?</b>
None		

**Justifications:**

<b>Facilities or Construction Projects</b>	<b>Justification</b>
None	

## **8. Limited English Proficiency (LEP)**

Executive Order 13166

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

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities

<b>Language</b>
Spanish

JCAD also collects data for languages spoken by airport guests.<sup>11</sup> Data sources include:

<b>Data Sources for Languages Spoken by Airport Guests</b>	<b>Website link to Data Source</b>
Airline-provided data	N/A
Bilingual Employees	N/A
Airport language line usage data	<a href="http://www.language-line.com">www.language-line.com</a>
Survey of vendors	N/A

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests:

<b>Language</b>
None

JCAD’s Title VI Coordinator will also actively engage with community educators, community

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<sup>11</sup> We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the JCAD of the responsibility to provide language access. JCAD has created the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

**Translation Services:**

- All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
- The following vendors have been identified for written translations:

<b>Translation Vendors</b>	<b>Languages</b>
Language Line Solutions	All above languages
I Speak language cards	All above languages
Volunteer Bilingual Employees	Spanish

- Information regarding translation services can be obtained at:

<b>Location for Translation Assistance</b>	<b>Languages</b>
Airport website request form	All above languages
Airport website translate view	all above languages
Volunteer multi-lingual staff pool	Spanish

**Interpretation Services:**

- The following vendors have been identified for interpretation services:

<b>Interpretation Vendors</b>	<b>Languages</b>
Language Line Solutions.	All above languages
Volunteer Bilingual Employees	Spanish

- Information regarding interpretation services can be obtained at:

<b>Location for Interpretation Assistance</b>	<b>Languages</b>
Airport Language Assistance page	All above languages
Airport information desks	All above languages, using Language Line, Inc. and I Speak cards

**Description of Interpretation Assistance Processes**

- JCAD contracts with Language Line Solutions to provide on-demand telephone interpretation services to airport guests free of charge. When a request for an interpreter is received, the following process is used: The Airport Administration office, Airport Security team, and Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contacts Language Line Solutions and “parks” the request in the

queue for the appropriate language. Language Line Solutions operators will coordinate connecting the requesting party to an interpreter for the duration of the call. The completed call is then logged in the Language Line Service binder. This log is retained for a period of not less than one year.

## **9. Transportation**

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

In the Community Statistics section of this plan, we identified Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas.

<b>Minority and/or Disadvantaged Community Areas</b>	<b>Transit Service</b>	<b>Planned or Existing</b>
Downtown Medford, between McAndrews and Barnett	Bus Route 61 Fixed-route buses	Existing
West Medford, along Main street	Bus Route 2 to Bus Route 61 or Bus Route 30 to Bus Route 61	Existing
Medford, west of I-5 between Jackson St and McAndrews Rd	Bus Route 27 to Bus Route 61	Existing

## **10. Minority Businesses**

49 CFR 21 Appendix C (a)(1)(x)

Bids for Airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

<b>Airport Business Opportunity</b>	<b>Minority Business Outreach Methods</b>
DBE/ACDBE	Annual outreach events with local minority owned businesses to provide information about the certification process and opportunities at the Airport. Notices of the events are emailed to minority- and women-owned businesses associations as well as posted to the Airport's website and social media accounts.
Sub-Contract Opportunities for Airport Improvements or Construction	During the solicitation process, the Airport forwards notices to reach minority- and women-owned businesses. Announcements are made in

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	social media, general circulation newspapers, and posted on the County's website. Contractors are encouraged to alert minority- and women-owned businesses about possible sub-contract opportunities.
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Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and documentation for specific bid decisions is kept with the Title VI Coordinator.

## **11. Training**

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- Appropriate Workplace Conduct training

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

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

- Compliance reviews or audits concerning civil rights requirements<sup>12</sup>
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements<sup>13</sup>

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, JCAD must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Coordinator will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within 5 years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

## **13. Title VI Complaints**

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

**Scope.** These procedures are for complaints of discrimination under Title VI and related laws (hereafter “Title VI Complaints.” In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters<sup>14</sup>
3. Allege misconduct by JCAD, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by JCAD including airport employees, contractors, concessionaires, lessees, or tenants.

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<sup>12</sup> Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

<sup>13</sup> Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

<sup>14</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with JCAD.<sup>15</sup> Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the Airport Director and the business named in the complaint.

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

*Traci Carrier, Title VI Coordinator*  
*Rogue Valley International-Medford Airport (MFR)*  
*1000 Terminal Loop Parkway, Suite 201*  
*Medford, Oregon 97504*  
*Phone: 541-776-7222*  
[CarrieCD@jacksoncountyor.gov](mailto:CarrieCD@jacksoncountyor.gov)

If a complaint is initially made by phone, it must be supplemented with a written complaint before 180 days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

Initial Procedure. The Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Coordinator will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

### **Discrimination Complaint Referral Procedure**

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within seven (7) days.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will upload the information to the FAA Civil Rights Connect System, which

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<sup>15</sup> Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

### **Investigation Procedure**

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

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against JCAD, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

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

Consultation with Legal Counsel. In each case, the Coordinator will consult with legal counsel regarding the investigation and the report. Airport legal counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through mediation with the Title VI Coordinator.

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 JCAD's conclusion regarding whether unlawful discrimination occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

- The complainant may appeal in writing to the Airport Director.
- The written appeal must be received within 15 business days after receipt of the written decision.



- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- The Airport Director will issue a final written decision in response to the appeal.

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

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

For information on filing a complaint with DOT/FAA, please contact the Title VI Coordinator.

This complaint procedure is shared with the public through the following methods:

#### **Website, In-person, and Other Distribution Methods**

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1. Posted on the airport's website

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2. Available in the Airport Administration Office

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## **14. Population / Language Data**

## **15. Completed Unlawful Discrimination Poster**