

BURBANK-GLENDALE-PASADENA AIRPORT AUTHORITY
TITLE VI PROGRAM

IV. Discrimination Complaint Guidelines and Procedures

The BGPAA adopts the following discrimination complaint procedures for complaints alleging discrimination in airport services, programs, or activities, which are to be followed in filing a complaint. These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination.

- A. *Filing a discrimination complaint:* Any person who believes that he or she has been or is being subjected to discrimination on the basis of race, color, national origin, gender, or creed by the Airport, its tenants, its vendors, or its agents has the right to file a complaint. Any individual wishing to file a discrimination complaint must be given the option to file the complaint with the Airport, or directly with the Federal Aviation Administration's Office of Civil Rights. Complaints may be filed with both agencies simultaneously. Information on how to file a Title VI complaint is posted on the Airport's website and on public notices distributed across the Airport property. A Title VI complaint form may be obtained by contacting the Title VI Coordinator at the Hollywood Burbank Airport offices, 2627 N. Hollywood Way, Burbank, CA 91505. Information on how to file a Title VI complaint may also be obtained during normal business hours by calling Title VI Coordinator, Scott Kimball at 818-565-1374. See Exhibit A, *BGPAA Title VI Complaint Form*, for an informational copy of the complaint form. If a complainant is unable to complete the complaint 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.
- B. *Complaint filing timeframe:* A discrimination complaint must be filed within 180 calendar days of either:
1. The alleged act of discrimination.
 2. Date when the person(s) became aware of the alleged discrimination.
 3. Date on which the conduct was discontinued, if there has been a continuing course of conduct.

The BGPAA or their designee 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 completes, signs, and submits the complaint form.

- C. *Contents of a complaint:* A discrimination complaint must be written. The document must contain the following information:

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1. The complainant's name and address, or other means by which the complainant may be contacted.
2. Identification of individual(s) or organization(s) responsible for the alleged discrimination.
3. A description of the complainant's allegations, which must include enough detail to determine whether BGPAA has jurisdiction over the complaint and if the complaint was timely filed.
4. The specific prohibited base(s) of alleged discrimination (i.e., race, color, gender, etc.).
5. Apparent merit of the complaint.
6. The complainant's signature or signature of his/her authorized representative.

In the event that a person makes a verbal complaint of discrimination to a BGPAA officer or employee, the complainant shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the complainant in reducing the complaint to writing and then submit the written version of the complaint to the person for signature.

- D. *Complaints against BGPAA:* Any complaints received against the BGPAA will be forwarded to the Federal Aviation Administration for investigation. BGPAA shall assign an independent investigator to investigate any complaint in which it has been named in the complaint or in instances where the Title VI Coordinator cannot investigate. The contact information for the FAA is:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591
Phone: (202) 267-3258

- E. *Notice of Receipt:* All complaints shall be referred to BGPAA's Title VI Coordinator for review and action. Within 10 days of receipt of the discrimination complaint, the Title VI Coordinator shall issue an initial written Notice of Receipt that:

1. Acknowledges receipt of the discrimination complaint.
2. Advises the complainant of his/her right to seek representation by an attorney or other individual of his or her choice in the discrimination complaint process.
3. Contains a list of each issue raised in the discrimination complaint.
4. Advises the complainant of the timeframes for processing the discrimination complaint and providing a determination.
5. Advises the complainant that he/she may also seek redress of the complaint directly with the FAA Office of Civil Rights.

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- F. *Notification of the FAA of a complaint:* The BGPAA shall advise the FAA within 15 business days of receipt of the complaint. The notice will contain a copy of the original Title VI complaint filed with the BGPAA.
- G. *Processing a complaint and timeframe:* The Title VI Coordinator will receive, manage, and make a determination on all filed complaints. Investigations will generally be completed within 90 days from receipt of a completed complaint form. If more information is needed to resolve a complaint, the Title VI Coordinator may contact the complainant and request more information. If the requested information is not received within 15 calendar days from the date of the request, the Title VI Coordinator may administratively close the complaint. A complaint may also be administratively closed if the complainant no longer wishes to pursue the case.
- H. *Notice of Final Action:* After the Title VI Coordinator reviews the complaint and completes the investigation, he or she will provide a Notice of Final Action to the complainant. The Notice will include:
1. A statement regarding the disposition of each issue identified in the discrimination complaint and reason for the determination; and
 2. An explanation of any corrective action taken.

BGPAA's Title VI Coordinator shall provide the FAA Office of Civil Rights with a copy of this decision, as well as a summary of findings upon completion of the investigation. Should deficiencies be noted in the implementation of these discrimination complaint procedures by the Airport, the FAA's Title VI Program Coordinator will work in conjunction with BGPAA's Title VI Coordinator to review the information and/or provide technical assistance in the discrimination complaint process and/or investigation.