

Title VI Requirements Affecting AIP and BIL Grants

FAA Title VI Checklist

Presented to: Montana and Idaho Airport Managers
By: Jason Garwood
Date: October 18, 2022



**Federal Aviation
Administration**

Letter to Airport Sponsors

- **Issued August 12, 2022**

- Notification of DOT Order 1000.12C (June 11, 2021)
- Reminder of nondiscrimination obligations
- Provides tentative FAA Implementation Schedule

Airport Type	Schedule
Large and Medium hub airports	FY 2023
Small and Non-hub airports	FY 2024
Block Grant States and smaller commercial service/reliever airports	FY 2024
General Aviation	FY 2025



Title VI Pre-Award Checklist

DOT Order Requirement: “During the Pre-Award Review period, each [Operating Administration (OA)] must conduct a Title VI Assessment of each applicant for Federal financial assistance”

- FAA is using the Checklist for the assessment
- Determine “probable” compliance or noncompliance
- Title VI Plans and Community Participation Plans could meet Assessment requirement
 - Guidelines to assist with developing plans are pending



Checklist Overview

- Checklist must be completed by the sponsor, then submitted with each grant application
- “No” responses indicate potential non-compliance
- “Yes” indicates compliance or a corrective action plan exists with ACR



Checklist – Section 1

- For the “meantime”, a “No” response in section 1 is not a compliance concern
 - Guidelines are pending for Title VI and Community Participation Plan requirements
- If there’s a “No” response in Section 1, then Sections 2 & 3 must be completed

SECTION 1 - Questions Concerning Prior Approval of Title VI Program	
1.1	The sponsor has a written Title VI Plan, approved by the FAA Office of Civil Rights and subsequently adopted by the sponsor, and documentation of the approval and adoption.
1.2	The sponsor has a written Community Participation Plan (CPP), or an equivalent public participation plan (PPP), and documented approval or concurrence of the plan from the FAA Office of Civil Rights.



FAA Title VI Pre-Award Checklist

- The checklist may be downloaded from the FAA website:
 - https://www.faa.gov/about/office_org/headquarters_offices/acr/airport-nondiscrimination-compliance-title-vi-lep-ej/pre-grant-award-checklist
- or just search online for “FAA Title VI Pre-Award Checklist”



FAA Title VI Pre-Award Checklist

- **Questions?**

- **Tentative Implementation Schedule**

Airport Type	Schedule
Large and Medium hub airports	FY 2023
Small and Non-hub airports	FY 2024
Block Grant States and smaller commercial service/reliever airports	FY 2024
General Aviation	FY 2025

