

Des Moines Airport Authority Title VI Plan

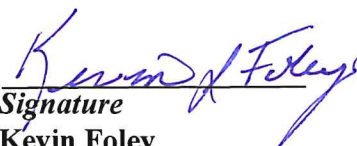
1. Title VI Policy Statement¹

Des Moines Airport Authority (DMAA) assures 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.

DMAA further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. DMAA agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Anytime communities may be impacted by programs or activities DMAA will take action to involve them and the general public in the decision-making process.

DMAA 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 DMAA and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Amy Fredricks, available at (515)256-5006 and afredricks@dsmairport.com, 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
Kevin Foley
Executive Director

November 1, 2023

November 1, 2026
3-Year Expiration Date

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

2. Administration

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 Coordinator's name. Significant revisions to our policies or federal guidelines may warrant a resubmittal to FAA and will be done accordingly and in a timely fashion.

In addition to the Coordinator and airport sponsor's leadership, the following people also assist with our Title VI program requirements: None.

As of the date of this plan, DMAA has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
TSA	None	Approximately \$20,000,000
FAA ATP 2024	None	\$28,000,000

In addition, **Airport Authority or State DOT's** sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT):

Federal Source	Grant Number	Amount
None		

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

Federal Source	Grant Award Information Available at:
FAA AIP	https://www.faa.gov/airports/aip/
FAA ATP	https://www.faa.gov/bil

3. Grant and Procurement Assurances

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

DMAA 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.

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/. 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. DMAA 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

Contract templates have been developed and are used which require all subcontracts to include the Civil Rights clauses. Subcontracts are audited by the Contracts and Reporting Administrator to verify they include the template language, for not less than 10 percent of contractors each year.

4. Title VI Coordinator Responsibilities

The Coordinator is responsible for ensuring that they and other staff 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 the 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 DMAA leadership on the status of Title VI compliance.
- 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 requested and 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)

DMAA 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,² and maintained. The poster template is available at 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.

DMAA has posted the above Title VI policy statement at its staff offices.

DMAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. The plan will be distributed within two weeks of final review and approval by FAA, by posting the Plan on the Airport's Title VI website <https://www.flydsm.com/at-the-airport/title-vi-airport-nondiscrimination-program>.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Terminal A		2	
Terminal C		2	
Information Desk	1		

² For more information about website accessibility, please visit ADA.gov.

Outreach to Affected Communities

DMAA ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify effective media platforms to share announcements and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and press release and/or verbal announcements at community events. DMAA contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ 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.

DMAA will create a detailed CPP by November 1, 2023. A copy of the plan will be available at <https://www.flydsm.com/at-the-airport/> or a hard copy will be available in the administrative offices.

To ensure that the community is effectively informed of and able to participate in public hearings, DMAA provides access to a translation service which has the ability to translate any language spoken that may be needed by the Affected Community population that has limited English proficiency (LEP). 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 DMAA will be able to identify, understand, and engage with communities. In doing so, DMAA needs to know about communities eligible to be served, actually or potentially affected, benefited, or burdened by DMAA’s airport program.

Affected Communities ⁴	Population
Polk County – Des Moines Township	99,532
Pok County – Lee Township	61,466

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

We have identified the following facts about the Affected Communities:

³ 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.

⁴ “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.

Low Income Communities⁵.

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,” DMAA is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report S1701: Poverty Status in the Past 12 Months, the overall poverty level for Polk County is approximately 10.2%. The poverty rate remains similar compared with the rest of the rest of the State of Iowa which is 11%. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
Polk County – Des Moines Township	15.8%
Polk County – Lee Township	17.5%

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 follows⁶:

Affected Community: Polk County – Des Moines Township
Total Affected Community Population: 99,532

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	71,543	72%
Black or African American alone	12,072	12%
American Indian or Alaska Native	286	0.2%
Asian alone	7,340	7%
Native Hawaiian or Other Pacific Islander	33	0%
Hispanic or Latino	10,917	11%
More than one	5,724	6%
Some other race	2,534	0.3%

Affected Community: Polk County – Lee Township
Total Affected Community Population: 61,466

⁵ 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.

⁶ Recommend using demographic groups from the U.S. Census.

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	41,010	67%
Black or African American alone	6,653	10.8%
American Indian or Alaska Native	314	0.5%
Asian alone	4,456	7%
Native Hawaiian or Other Pacific Islander	5	0%
Hispanic or Latino	13,017	21%
More than one	5,181	8%
Some other race	3,847	6%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that DMAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is from the American Community Survey for Polk County.

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.⁸ The safe harbor for our 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	11,700	+/-852
Serbo-Croatian	2,048	+/-918
Vietnamese	1,442	+/-286
Other Asian Languages	1,662	+/-514
Chinese	1,439	+/-378
African Languages	1,624	+/-413

⁷ 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.

⁸ 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.

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

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
Spanish		X		
Serbo-Croatian	X			
Vietnamese	X			
Other Asian Languages	X			
Chinese	X			
African Languages	X			

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include: None

This information is updated annually⁹ through checking the following resources:

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

⁹ 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.

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

- *Participants at small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.*
- *Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.*

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

-
- *Employees are asked to submit voluntary confidential demographic information at time of hiring.*
 - *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information. .*
-

7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no DMAA activity must 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. This means that policies or procedures that have a disparate impact would require 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.⁹

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

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Parking Garage Addition	None
Deicing Facility/Pads	None

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

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
Rental Car CSB	None

⁹ 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.

Terminal	None
----------	------

We have 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: None

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the DMAA 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:

Language
Spanish
Serbo-Croatian
Vietnamese
Other Asian Languages
Chinese
African Languages

DMAA also collects data for languages spoken by airport guests.¹⁰ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Airport language line usage data	www.language.com

¹⁰ 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.

The Title VI Coordinator will also actively engage with community educators, community 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 DMAA of the responsibility to provide language access. We have made 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

Translation Vendors	Languages
Language Line	All above languages

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport Information Desk	All above languages
Airport Police and Security Personnel	All above languages

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Language Line	All above languages

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport Information Desk	All above languages
Airport Police and Security Personnel	All above languages
Security Screening Checkpoints	All above languages

Description of Interpretation Assistance Processes

- *The DMAA contracts with the Language Line, Inc. to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest. Staff contacts Language Line, Inc., and “parks” the request in the queue for the appropriate language. Language Line, Inc. operators will connect 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 kept for 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.

We have coordinated with Des Moines Area Regional Transit Authority (DART) and the City of Des Moines to encourage them to provide transit service access between the airport and these areas.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas. We have used a minimum of 10% poverty rate as the threshold to determine disadvantaged community areas.

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing
Polk County – Des Moines Township	Fixed-route buses	Existing
Polk County – Lee Township	Fixed-route buses	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:

Airport Business Opportunity	Minority Business Outreach Methods
Food & Beverage Concession Contract	Advertise RFP through Bee Line and Blue, an online portal for procurement opportunities, notices sent via current outreach email lists and information posted on our web-site.
Vending Machine Concession Contract	Advertise RFP through Bee Line and Blue, an online portal for procurement opportunities, notices sent via current outreach email lists, and information posted on our web-site.

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 DMAA's

Administrative Offices.

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
- Anti-harassment training
- Cultural and community relations sensitivity training

Refresher information will be provided annually.

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 requirements¹¹
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹²

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, DMAA 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 matters¹³
3. Allege misconduct by DMAA, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by DMAA including airport employees, contractors, concessionaires, lessees, or tenants.

¹¹ 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.

¹² 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.

¹³ 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 DMAA.¹⁴ 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 DMAA office involved in the complaint, the Executive Director, and any other office, as appropriate.

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

Amy Fredricks
Contracts and Reporting Administrator
Des Moines Airport Authority
5800 Fleur Dr. Des Moines, IA 50321
(515) 256-5006; afredricks@dsmairport.com

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 48 hours.

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 email the FAA Office of Civil Rights analyst(s), as well as upload the

¹⁴

relevant information to the FAA Civil Rights Connect System. 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 DMAA, 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 negotiation or mediation, as required.

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 DMAA'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 email and/or 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's Executive Director.

- The written appeal must be received seven 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 Executive 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, DMAA will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. DMAA 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 Amy Fredricks.

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

Website, In-person, and Other Distribution Methods

1. DMAA website, Civil Rights page at <https://www.flydsm.com/at-the-airport/title-vi-airport-nondiscrimination-program>
2. A copy of the procedure will be available at the airport-sponsored information desk

14. Population / Language Data

Poverty Data Polk County, Iowa

Source: American Community Survey, 2022: Poverty Status in the Past 12 Months

Label	TOTAL		BELOW POVERTY LEVEL		PERCENT BELOW POVERTY LEVEL	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	492,908	±737	50,087	±7,026	10.2%	±1.4
AGE						
Under 18 years	118,846	±615	15,238	±4,035	12.8%	±3.4
Under 5 years	31,267	±403	4,176	±1,279	13.4%	±4.1
5 to 17 years	87,579	±418	11,062	±3,116	12.6%	±3.6
Related children of householder under 18 years	118,685	±615	15,077	±4,056	12.7%	±3.4
18 to 64 years	305,381	±713	31,068	±3,736	10.2%	±1.2
18 to 34 years	117,185	±305	16,155	±2,866	13.8%	±2.4
35 to 64 years	188,196	±644	14,913	±2,350	7.9%	±1.2
60 years and over	98,730	±2,287	7,096	±1,180	7.2%	±1.2
65 years and over	68,681	±597	3,781	±892	5.5%	±1.3
SEX						
Male	246,092	±983	23,324	±3,958	9.5%	±1.6
Female	246,816	±998	26,763	±3,928	10.8%	±1.6
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	374,359	±3,529	27,419	±4,902	7.3%	±1.3
Black or African American alone	36,846	±2,418	12,003	±4,079	32.6%	±10.1
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	23,340	±1,945	4,807	±2,787	20.6%	±11.1
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N

Some other race alone	16,757	±4,202	2,083	±1,265	12.4%	±6.8
Two or more races	40,755	±5,908	3,760	±1,531	9.2%	±3.7
Hispanic or Latino origin (of any race)	46,341	±345	4,766	±1,797	10.3%	±3.9
White alone, not Hispanic or Latino	365,180	±2,481	26,469	±4,840	7.2%	±1.3
EDUCATIONAL ATTAINMENT						
Population 25 years and over	330,491	±1,073	26,869	±3,032	8.1%	±0.9
Less than high school graduate	24,896	±2,837	5,351	±1,458	21.5%	±5.3
High school graduate (includes equivalency)	74,255	±4,814	8,911	±1,642	12.0%	±2.2
Some college, associate's degree	95,876	±5,285	7,236	±1,646	7.5%	±1.7
Bachelor's degree or higher	135,464	±6,113	5,371	±1,438	4.0%	±1.0
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	278,819	±4,420	15,484	±2,709	5.6%	±1.0
Employed	270,086	±4,485	13,177	±2,508	4.9%	±0.9
Male	141,461	±3,417	5,830	±1,629	4.1%	±1.1
Female	128,625	±2,602	7,347	±1,541	5.7%	±1.2
Unemployed	8,733	±2,127	2,307	±1,120	26.4%	±10.0
Male	4,477	±1,394	1,283	±748	28.7%	±13.3
Female	4,256	±1,389	1,024	±635	24.1%	±13.0
WORK EXPERIENCE						
Population 16 years and over	388,716	±1,173	37,043	±4,458	9.5%	±1.1
Worked full-time, year-round in the past 12 months	203,021	±4,607	3,349	±1,141	1.6%	±0.6
Worked part-time or part-year in the past 12 months	88,318	±4,120	14,077	±2,486	15.9%	±2.6
Did not work	97,377	±4,475	19,617	±3,243	20.1%	±2.9
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	26,006	±5,097	(X)	(X)	(X)	(X)

125 percent of poverty level	66,053	±7,129	(X)	(X)	(X)	(X)
150 percent of poverty level	80,140	±7,536	(X)	(X)	(X)	(X)
185 percent of poverty level	107,653	±8,624	(X)	(X)	(X)	(X)
200 percent of poverty level	120,726	±8,240	(X)	(X)	(X)	(X)
300 percent of poverty level	188,762	±8,212	(X)	(X)	(X)	(X)
400 percent of poverty level	262,874	±9,296	(X)	(X)	(X)	(X)
500 percent of poverty level	335,573	±7,616	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	108,171	±5,077	19,981	±2,824	18.5%	±2.5
Male	53,544	±3,710	9,614	±1,983	18.0%	±3.5
Female	54,627	±2,882	10,367	±1,832	19.0%	±3.3
15 years	0	±170	0	±170	-	**
16 to 17 years	161	±150	161	±150	100.0%	±44.9
18 to 24 years	15,788	±2,421	4,914	±1,712	31.1%	±8.9
25 to 34 years	26,678	±2,801	4,352	±1,384	16.3%	±4.7
35 to 44 years	15,641	±2,550	2,127	±1,252	13.6%	±7.7
45 to 54 years	12,745	±2,387	1,958	±903	15.4%	±6.3
55 to 64 years	14,588	±1,803	4,181	±981	28.7%	±5.3
65 to 74 years	11,789	±1,742	1,370	±439	11.6%	±3.4
75 years and over	10,781	±1,162	918	±326	8.5%	±3.1
Mean income deficit for unrelated individuals (dollars)	8,989	±760	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	56,024	±3,862	1,348	±875	2.4%	±1.6
Worked less than full-time, year-round in the past 12 months	24,159	±2,912	9,092	±1,964	37.6%	±6.1
Did not work	27,988	±2,829	9,541	±2,058	34.1%	±6.0
Population in housing units for whom poverty status is determined	491,844	±738	49,492	±7,025	10.1%	±1.4

Language Data Polk County, Iowa

Source: American Community Survey, 2015: Language Spoken at Home by
Ability to Speak English for the Population 5 Years and Over

(Most current data available on the Census Website)

Language & Ability Level	Estimate	Margin of Error
Total:	419,225	±24
Speak only English	367,080	±1,837
Spanish or Spanish Creole:	24,417	±1,051
Speak English "very well"	12,717	±869
Speak English less than "very well"	11,700	±852
French (incl. Patois, Cajun):	584	±166
Speak English "very well"	502	±149
Speak English less than "very well"	82	±48
French Creole:	3	±5
Speak English "very well"	3	±5
Speak English less than "very well"	0	±22
Italian:	355	±147
Speak English "very well"	233	±92
Speak English less than "very well"	122	±102
Portuguese or Portuguese Creole:	109	±69
Speak English "very well"	81	±63
Speak English less than "very well"	28	±32
German:	1,009	±286
Speak English "very well"	836	±206
Speak English less than "very well"	173	±128
Yiddish:	4	±6
Speak English "very well"	0	±22
Speak English less than "very well"	4	±6
Other West Germanic languages:	159	±87
Speak English "very well"	137	±79
Speak English less than "very well"	22	±21
Scandinavian languages:	84	±62
Speak English "very well"	78	±58
Speak English less than "very well"	6	±12
Greek:	33	±33
Speak English "very well"	17	±17
Speak English less than "very well"	16	±25
Russian:	417	±175

Speak English "very well"	291	±144
Speak English less than "very well"	126	±76
Polish:	209	±118
Speak English "very well"	109	±82
Speak English less than "very well"	100	±71
Serbo-Croatian:	4,751	±918
Speak English "very well"	2,703	±614
Speak English less than "very well"	2,048	±469
Other Slavic languages:	85	±63
Speak English "very well"	50	±41
Speak English less than "very well"	35	±33
Armenian:	21	±33
Speak English "very well"	0	±22
Speak English less than "very well"	21	±33
Persian:	51	±60
Speak English "very well"	18	±28
Speak English less than "very well"	33	±52
Gujarati:	127	±119
Speak English "very well"	118	±114
Speak English less than "very well"	9	±16
Hindi:	944	±366
Speak English "very well"	753	±309
Speak English less than "very well"	191	±120
Urdu:	146	±159
Speak English "very well"	107	±110
Speak English less than "very well"	39	±59
Other Indic languages:	1,058	±417
Speak English "very well"	473	±237
Speak English less than "very well"	585	±280
Other Indo-European languages:	286	±234
Speak English "very well"	219	±225
Speak English less than "very well"	67	±46
Chinese:	1,439	±378
Speak English "very well"	597	±212
Speak English less than "very well"	842	±287
Japanese:	248	±135
Speak English "very well"	179	±119
Speak English less than "very well"	69	±45
Korean:	632	±412
Speak English "very well"	269	±164
Speak English less than "very well"	363	±345
Mon-Khmer, Cambodian:	259	±163
Speak English "very well"	109	±129
Speak English less than "very well"	150	±85

Hmong:	307	±218
Speak English "very well"	183	±131
Speak English less than "very well"	124	±93
Thai:	905	±314
Speak English "very well"	434	±218
Speak English less than "very well"	471	±193
Laotian:	1,936	±432
Speak English "very well"	1,312	±414
Speak English less than "very well"	624	±187
Vietnamese:	2,555	±435
Speak English "very well"	1,113	±251
Speak English less than "very well"	1,442	±286
Other Asian languages:	2,599	±587
Speak English "very well"	937	±311
Speak English less than "very well"	1,662	±514
Tagalog:	461	±158
Speak English "very well"	230	±94
Speak English less than "very well"	231	±102
Other Pacific Island languages:	108	±102
Speak English "very well"	65	±69
Speak English less than "very well"	43	±42
Navajo:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Native North American languages:	114	±128
Speak English "very well"	43	±61
Speak English less than "very well"	71	±78
Hungarian:	5	±8
Speak English "very well"	5	±8
Speak English less than "very well"	0	±22
Arabic:	1,843	±454
Speak English "very well"	1,143	±338
Speak English less than "very well"	700	±197
Hebrew:	36	±30
Speak English "very well"	36	±30
Speak English less than "very well"	0	±22
African languages:	3,773	±655
Speak English "very well"	2,149	±397
Speak English less than "very well"	1,624	±413
Other and unspecified languages:	73	±71
Speak English "very well"	55	±54
Speak English less than "very well"	18	±21

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Airport Manager or:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591

Federal regulations on unlawful discrimination are available for review in the Airport Manager's Office.

Coordinator: Title VI: Amy Fredricks
Phone: (515) 256-5006
Address: 5800 Fleur Dr, Room 207
Des Moines, IA 50321
afredricks@dsmaairport.com

Discriminacion Ilegal

Se prohíbe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento físico o discapacidad en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán ser dirigidas inmediatamente al Administrador del Aeropuerto o a:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

Coordinador: Title VI: Amy Fredricks
Teléfono: (515) 256-5006
Dirección: 5800 Fleur Dr, Room 207
Des Moines, IA 50321
afredricks@dsmaairport.com



U.S. Department of Transportation
Federal Aviation Administration

HO-101033