




DBE, Title VI and ADA Compliance

How to Be Better Prepared When FAA Calls



Angela Martin, Director, Office of Fair Practices,
Maryland Aviation Administration - Includes
Baltimore Washington International Thurgood
Marshall (BWI Marshall) and Martin State
Airports.



- As Director – responsible for implementation, management, operation and program compliance of 5 Civil Rights Programs.
- Minority business Enterprise (MBE) Program (State)
- Disadvantaged Business enterprise (DBE) Program (Federal)
- Airport Concessions Disadvantaged Business Enterprise (ACDBE) Program (Federal)
- Equal Opportunity/Affirmative Action Program(State/Federal)
- Title VI and ADA Programs (Federal and State)



Compliance responsibilities for the programs are handled through OFP staff which include the following:

- Deputy Director, Office of Fair Practices – all office programs and special projects
- MBE/DBE Manager – MBE, DBE and ACDBE Programs
- EEO/AAP Compliance Manager – EEO/AAP, ADA and Title VI Programs
- In the past OFP Director has prepared the airport's response to a DBE/ACDBE compliance review, which included correspondence with the FAA representatives, pulling together documents to be submitted to the FAA, submission of documents(hard copy and electronic) arranging agency interviews and tours of the facilities and follow up on issues raised in the final review.

Biggest Challenges For Being Well Prepared for a Compliance Review Include:

- Sufficient staff available to prepare/organize requested contract and other files requested by the FAA
- Coordination of staff for interviews and meetings as some requested staff don't want to meet (want DBE/ACDBE staff to handle); have schedule conflicts or work that they don't want to miss and/or are uncomfortable with the compliance review process.
- Status of necessary/requested documents- documents may not be in good shape to be provided to the FAA (Airports with small staffs may have this issue).

Biggest Challenges For Being Well Prepared for a Compliance Review Include (con't):

- Lack of understanding of the need for requested information and the time constraints and deadlines that must be met.
- Lack of funds needed to make some of the required changes to the airport (e.g. physical changes needed for ADA compliance; additional surveys and demographic research necessary for Title VI plans, etc.).
- Lack of designated staff to handle management and oversight responsibilities for key program components (e.g. designated ADA and Title VI Program Managers).