

TITLE VI PLAN

Kenton County Airport Board
December 2023

ATTENTION
Landing Passengers
Please check your baggage for
damages before leaving
the baggage claim area.



Table of Contents

1. Title VI Policy Statement	Page 2
2. Grant Administration	Page 3
3. Grant and Procurement Assurances	Page 4
4. Title VI Coordinator Responsibilities	Page 5
5. Notice	Page 6
6. Community Statistics	Page 7
7. Potential or Known Community Impacts	Page 11
8. Limited English Proficiency (LEP)	Page 12
9. Transportation	Page 14
10. Minority Businesses	Page 14
11. Training	Page 15
12. Compliance Reviews, Audits, Complaints, Lawsuits And Other Investigations	Page 15
13. Title VI Complaints	Page 16
14. Population Data	Page 19
15. Language Data	Page 20
16. Completed Unlawful Discrimination Poster	Page 23

Title VI Plan
Cincinnati/Northern Kentucky International Airport

1. Title VI Policy Statement

The Cincinnati/Northern Kentucky International Airport Sponsor (“CVG”) 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.

CVG 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. CVG agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. Any time communities may be impacted by programs or activities CVG will take action to involve them and the general public in the decision-making process.

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

Larisa Sims, available at (859)767-1421 and lsims@cvgairport.com, serves as CVG’s Title VI Coordinator and is responsible for overseeing compliance with Title VI and is the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

Candace S. McGraw
Signature

Candace McGraw
Chief Executive Officer

12/29/2023
Effective Date

12/29/2026
3-Year Expiration Date

2. Grant Administration

The Kenton County Airport Board has reviewed and adopted this Title VI Plan for the Cincinnati/Northern Kentucky International Airport. This plan will be updated no less than once every three (3) years. This plan will not be re-adopted following minor changes, such as updating the Airport Chief Executive Officer or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by CVG and resubmittal to FAA.

In addition to the Coordinator and CVG’s leadership, the following departments also assist with our Title VI program requirements:

Departments Supporting Title VI Program	Name	Title
<i>Contract and Procurement Administration</i>	<i>LaDonna Purcell</i>	<i>Director, Contracts and Procurement Administration</i>
<i>Customer Experience</i>	<i>Meleia Michels</i>	<i>Sr Manager, Customer Services</i>
<i>Planning and Development</i>	<i>Debbie Conrad</i>	<i>Sr Project Manager, Planning and Development</i>
<i>Human Resources</i>	<i>Gina Stough</i>	<i>Vice President, Human Resources</i>
<i>Public Affairs</i>	<i>Seth Cutter</i>	<i>Vice President, Public Affairs</i>

CVG has the following airport program sub-recipients: None

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

Federal Source	Grant Number	Amount
<i>US DOT CFI Discretionary</i>	<i>Pending</i>	<i>\$3,000,000</i>
<i>US DOT SMART Grant (CLEAR- Cargo)</i>	<i>Pending</i>	<i>\$1,649,700</i>
<i>US DOT SMART Grant (Moving Sidewalk)</i>	<i>Pending</i>	<i>\$1,422,800</i>
<i>FAA Airport Terminal Grants (PBB)</i>	<i>Pending</i>	<i>\$24,237,003</i>
<i>FAA Airport Terminal Grants (Terminal Rehab)</i>	<i>Pending</i>	<i>\$49,920,000</i>
<i>FAA FAST - SAF</i>	<i>Pending</i>	<i>\$928,173</i>
<i>FAA Aviation Maintenance Technical Workers Workforce Development Grant</i>	<i>Pending</i>	<i>\$479,000</i>

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

Federal Source	Grant Award Information Available at:
<i>US DOT - FHWA</i>	https://www.fhwa.dot.gov/environment/cfi/
<i>US DOT</i>	https://www.transportation.gov/grants/SMART
<i>FAA</i>	https://www.transportation.gov/rural/grant-toolkit/airport-terminals-program
<i>FAA</i>	https://www.faa.gov/about/office_org/headquarters_offices/ang/grants/awd

3. Grant and Procurement Assurances

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

CVG 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. CVG requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. CVG will review subcontracts, subleases, and other agreements for compliance.

Description of Oversight Methods for Subcontracts

Applicable contract templates are updated with the current version of the contract clauses. Contract language requires contractors to include Title VI provisions in any subcontracts. The annual audit schedule will include 3 contracts per year; Internal Audit will review the subcontracts awarded under the scope of those contracts and assess compliance with Title VI provisions..

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; and
- 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 CVG is in compliance with nondiscrimination requirements of Title VI and reports to CVG 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 CVG'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, and bids/proposals for CVG contracts, and other methods described in the airport Community Participation Plan (CPP).
- Provides local community demographic information and summary of voluntarily disclosed demographic data for board members to the appointing officials of CVG board members with the goal of recruiting representative membership.
- 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)

CVG will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible, 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.

CVG will post the above Title VI policy statement at its staff offices upon approval of the program. CVG will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed upon approval by email and at tenant meetings.

Posters are displayed in the terminal, both concourses 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
<i>Terminal Ticketing</i>	2		
<i>Terminal Baggage Claim (Rental Cars)</i>	2		
<i>Concourse A</i>		2	
<i>Concourse B</i>		3	
<i>FBO</i>			1

Outreach to Affected Communities

The Public Affairs department ensures notices for required public hearings reach all segments of the impacted community. The Title VI coordinator will work with Public Affairs to identify effective platforms to share announcements and notices. Public Affairs maintains relationships with community leaders and communicates with representatives in Affected Communities to consult on effective media platforms to reach all Affected Communities and provide important feedback on translated materials.

CVG will create a detailed Community Participation Plan (CPP) by December 31, 2023. A copy of the plan will be available on the airport website.

To ensure that the community is effectively informed of and able to participate in public hearings, Public Affairs includes public notices translated into languages as required, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Public 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, CVG will be able to identify, understand, and engage with communities. In doing so, CVG needs to know about communities eligible to be served, actually or potentially affected, benefited, or burdened by CVG’s airport program.

We have identified the following facts about the Affected Communities:

Affected Communities¹	Population
<i>Boone County, KY</i>	<i>133,143</i>

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

Low-Income Communities.

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,” CVG is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, *SI701: Poverty Status in the Past 12 Months*, the overall poverty level for the Cincinnati Metropolitan Statistical Area (MSA) is approximately 11.8%. The poverty rate remains similar compared with that of Kentucky. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
<i>Boone County, KY</i>	<i>6.1%</i>

¹ “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.

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:

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	<i>117,741</i>	<i>88%</i>
<i>Black or African American</i>	<i>4,935</i>	<i>4%</i>
<i>American Indian or Alaska Native</i>	<i>312</i>	<i>.2%</i>
<i>Asian</i>	<i>3,052</i>	<i>2%</i>
<i>Native Hawaiian or Other Pacific Islander</i>	<i>52</i>	<i>.04%</i>
<i>Hispanic or Latino</i>	<i>5,795</i>	<i>4%</i>
<i>Other</i>	<i>2,735</i>	<i>2%</i>
<i>Two or more</i>	<i>4,316</i>	<i>3%</i>

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that CVG communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages² that are spoken in LEP households in the Affected Communities. The data source is the U.S. Census American Community Survey 2021.

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.³ The safe harbor for our community is 1000. 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
<i>Spanish</i>	<i>3070</i>	<i>+/-436</i>
<i>Japanese</i>	<i>907</i>	<i>+/-326</i>
<i>German</i>	<i>485</i>	<i>+/-225</i>
<i>French</i>	<i>479</i>	<i>+/-231</i>
<i>Other African</i>	<i>425</i>	<i>+/-191</i>
<i>Chinese</i>	<i>364</i>	<i>+/-206</i>

² Identified language groups from the U.S. Census using data for the “Speak English less than ‘very well’” category for each language over the threshold.

³ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>.

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

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)	Unknown
<i>Spanish</i>			<i>X</i>		
<i>Japanese</i>					<i>X</i>
<i>German</i>					<i>X</i>
<i>French</i>		<i>X</i>			
<i>Other African</i>					<i>X</i>
<i>Chinese (incl. Mandarin)</i>	<i>X</i>				
<i>Arabic</i>	<i>X</i>				
<i>Haitian-Creole</i>	<i>X</i>				
<i>Portuguese</i>	<i>X</i>				
<i>Ukrainian</i>	<i>X</i>				

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others include: The languages indicated in the table above represent the predominant languages most spoken by LEP population in the affected community. CVG monitors data from service providers, such as language line, to ensure language provision needs are met.

This information is updated annually 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

Beneficiary Diversity.

Demographic information may be collected from airport customers and businesses seeking opportunities at the airport, through voluntary disclosures.

Description of Beneficiary Demographic Information Collection Methods

- *Airport Customer Experience conducts surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.*
 - *Businesses that submit bids or offers may voluntarily provide demographic information, submitted through CVG's bidding website. Airport administration adheres to and collects demographic information as part of several minority business enterprise programs, including the Federal Disadvantaged Business Enterprise (DBE) and Airport Concessions Disadvantaged Business Enterprise (ACDBE) programs.*
-

Staff and Advisory Board Diversity.

Demographic information may be collected from airport program employees and Board Members through voluntary disclosures.

Description of Employee and Board Demographic Information Collection Methods

- *Employees may voluntarily submit confidential demographic information at the time of hiring.*
 - *CVG staff will provide local community demographic information to the appointing officials of CVG board members with the goal of recruiting representative membership.*
-

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, CVG activity should not 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.

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

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
<i>Terminal</i>	<i>None</i>
<i>Concourse A</i>	<i>None</i>
<i>Concourse B</i>	<i>None</i>
<i>Consolidated Car Rental Facility</i>	<i>None</i>

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

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>Exit Lane</i>	<i>None</i>
<i>Tunnel Refurbishment</i>	<i>None</i>
<i>Concourse A Refurbishment</i>	<i>None</i>
<i>Concourse B Refurbishment</i>	<i>None</i>
<i>Baggage Handling System</i>	<i>None</i>
<i>Ramp Rehab</i>	<i>None</i>
<i>Runway 18/36 Center Rehab</i>	<i>None</i>

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, CVG considers 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
<i>Spanish</i>
<i>Japanese</i>
<i>German</i>
<i>French</i>
<i>Other African</i>
<i>Chinese</i>

CVG also collects data for languages spoken by airport guests.⁴ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Data Source
<i>Language Line Solutions</i>	<i>Monthly usage data</i>
<i>Airport Website Translations</i>	<i>Google Analytics</i>
<i>Assumption from flight origin / destination</i>	<i>N/A</i>

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests: none

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 CVG of the responsibility to provide language access. CVG has 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:

⁴ CVG aims 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.

Translation Services:

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

Translation Vendors	Languages
<i>Language Line Solutions</i>	<i>All above languages</i>

- Information regarding translation services can be obtained at:

Location for Translation Requests	Languages
<i>Airport Information Email/Phone</i>	<i>All above languages</i>
<i>Airport Website</i>	<i>All above languages</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Language Line Solutions</i>	<i>All above languages, including ASL</i>
<i>Deaf Choice</i>	<i>ASL</i>

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Airport information desks</i>	<i>All above languages</i>
<i>Airport website</i>	<i>All above languages</i>

Description of Interpretation Assistance Processes

CVG contracts with Language Line Solutions to provide on-demand telephone and iPad interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff or other airport employees use the language identification cards to identify the language spoken by the airport guest. Staff contacts Language Line Solutions and appropriate language speaking operators will assist. The completed call is then logged and included with the monthly usage report from Language Line Solutions.

Deaf Choice interpretation services can also be arranged in advance of a passenger's travel to assist with ASL.

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 Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified. CVG has coordinated with the Transit Authority of Northern Kentucky (TANK) to provide transit service between the communities and the airport.

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

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing
<i>Florence, KY within Boone County</i>	<i>Fixed-route buses</i>	<i>Existing</i>
<i>Cincinnati, OH</i>	<i>Fixed-route buses</i>	<i>Existing</i>

10. Minority Businesses

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

Solicitations 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
<i>All opportunities</i>	<i>CVG conducts and participates in outreach and training opportunities for small businesses through various partnerships. Additionally, CVG advertises opportunities through its website and various media, including, but not limited to, local newspapers, minority-based organizations, trade publications, direct e-mail, and local chambers of commerce.</i>

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 Contracts and Procurement Administration department.

11. Training

New employees will receive Title VI training, as applicable. 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
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment 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 requirements⁵
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements⁶

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, CVG 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 five (5) years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

⁵ Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on CVG or any of its sub-recipients by any State, local or Federal agency.

⁶ 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

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 matters⁷
3. Allege misconduct by the Cincinnati/Northern Kentucky International Airport (CVG), including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by CVG, including airport employees, contractors, concessionaires, lessees, or tenants.

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 CVG. 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.

CVG is committed to a policy of non-discrimination in the conduct of its business, including its Title VI/§504 responsibilities, and to the delivery of equitable and accessible airport services. It is the policy of CVG that no person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination in the receipt of its services 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.

The complaint should be in writing and contain information about the alleged discrimination, including name, address, and phone number of Customer, date, and description of the alleged discrimination. To file a grievance, a Title VI/ADA form may be filled out on the airport website or sent to the Title VI/ADA Coordinator. Alternate means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities, upon request. A separate complaint should be filed for each alleged act of discrimination.

employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

⁷ 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.

The complaint should be submitted by the customer, or his/her designee, as soon as possible but no later than one hundred eighty (180) days after the alleged violation to:

Larisa Sims
Title VI Coordinator
Cincinnati/Northern Kentucky International Airport
P.O. Box 752000
Cincinnati, OH 45275-2000

Alternatively, the Coordinator may also be reached by the following means:

- Telephone - 859.767.1421
- Email - lsims@cvgairport.com or info@cvgairport.com

If the customer needs access assistance, such as a sign language interpreter, or needs alternate means to file a complaint, such as a personal interview or by tape recording, or other language assistance for persons with limited English proficiency, the customer may use the contacts above to initiate such a request. Upon request, CVG will make available other assistance as necessary for filing a complaint. The Coordinator may need a minimum of one (1) week's notice to accommodate such a request.

Within five (5) calendar days of receipt of the complaint, a letter acknowledging receipt of the complaint will be transmitted to the Customer by the Coordinator. The Coordinator will work with appropriate personnel to investigate the complaint for resolution. Within fifteen (15) calendar days after receipt of the complaint, the Coordinator will contact or meet with the Customer to discuss the complaint and the possible resolution. In addition, within fifteen (15) calendar days of receipt, the Coordinator will forward to the FAA a copy of the written complaint, together with a statement describing all actions taken to resolve the matter and the results thereof, if any.

Within thirty (30) calendar days, the Coordinator will attempt to resolve complaints unless the factual investigation or complexity of the complaint necessitates additional resolution time. Unless additional time is required, the Coordinator shall notify the customer in writing or, when requested, in an alternate format, of the results of the investigation and options for substantive resolution of the complaint. The response will generally contain the following information:

1. A description of the complaint
2. A summary of the facts
3. An explanation of Airport's position
4. A summary of the resolution option(s)
5. The timeframe for resolving the complaint, if applicable

When Tenant/Service Providers are implicated in a complaint, the following will take place:

If the Coordinator finds that an alleged violation involves a tenant or service provider's service, activity, program, benefit, or facility, the Coordinator will notify the appropriate representative of the tenant or service provider, and appropriate Airport department(s) overseeing operations and/or

contractual obligations, of the complaint. The Coordinator will notify the customer that the matter is being investigated by the tenant or service provider and will provide the customer with the name, address and telephone number of the tenant or service provider's representative.

The Coordinator will request that the tenant or service provider investigate the allegation set forth in the complaint and coordinate the investigation results and resolution with the Coordinator. The Coordinator will coordinate the transmittal of the response with the tenant or service provider and inform appropriate Airport department(s) overseeing operations and/or contractual obligations of the investigation and resolution.

Appeal Process. If the complaint is not resolved to the customer's satisfaction, the customer may request a further review of the complaint with the Airport's Vice President of Customer Experience. The customer must file this request for further review, in writing, within fifteen (15) calendar days after receipt of the response from the Coordinator. The customer must send a copy of the original complaint, the Coordinator's response, and a description of the customer's concerns or objections to:

Adam Kressler
Vice President of Customer Experience
Cincinnati / Northern Kentucky International Airport
P.O. Box 752000
Cincinnati, OH 45275-2000

Within fifteen (15) calendar days after receipt of the appeal, the VP of Customer Experience, or his/her designee, will contact or meet with the customer to discuss the complaint and the possible resolution. Within fifteen (15) days of communicating with the customer, the VP of Customer Experience, or his/her designee will respond in writing and, where appropriate, in a format accessible to the customer, with a final resolution of the complaint.

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

1 Airport website, www.cvgairport.com

2 By contacting the Airport Title VI Coordinator

14. Population Data

Boone County, Kentucky						
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	133,143	±367	8,095	±1,069	6.1%	±0.8
AGE						
Under 18 years	34,499	±317	2,955	±588	8.6%	±1.7
Under 5 years	8,478	±170	790	±285	9.3%	±3.4
5 to 17 years	26,021	±251	2,165	±445	8.3%	±1.7
Related children of householder under 18 years	34,409	±323	2,865	±581	8.3%	±1.7
18 to 64 years	80,692	±249	4,495	±604	5.6%	±0.7
18 to 34 years	26,856	±264	1,991	±381	7.4%	±1.4
35 to 64 years	53,836	±320	2,504	±440	4.7%	±0.8
60 years and over	25,940	±692	1,032	±242	4.0%	±0.9
65 years and over	17,952	±212	645	±187	3.6%	±1.0
SEX						
Male	66,191	±356	3,625	±574	5.5%	±0.9
Female	66,952	±367	4,470	±687	6.7%	±1.0
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	117,741	±649	5,369	±769	4.6%	±0.7
Black or African American alone	4,935	±493	955	±435	19.4%	±8.6
American Indian and Alaska Native alone	312	±131	11	±18	3.5%	±6.2
Asian alone	3,052	±345	219	±251	7.2%	±8.0
Native Hawaiian and Other Pacific Islander alone	52	±133	0	±29	0.0%	±42.7
Some other race alone	2,735	±635	1,264	±466	46.2%	±15.4
Two or more races	4,316	±740	277	±213	6.4%	±4.9
Hispanic or Latino origin (of any race)	5,795	±66	1,555	±461	26.8%	±7.9
White alone, not Hispanic or Latino	115,097	±537	5,195	±756	4.5%	±0.7
EDUCATIONAL ATTAINMENT						
Population 25 years and over	88,115	±310	4,478	±638	5.1%	±0.7
Less than high school graduate	5,743	±648	951	±295	16.6%	±4.8
High school graduate (includes equivalency)	25,149	±1,449	1,505	±320	6.0%	±1.3
Some college, associate's degree	27,102	±1,328	1,621	±435	6.0%	±1.6
Bachelor's degree or higher	30,121	±1,333	401	±157	1.3%	±0.5
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	71,620	±1,061	2,596	±470	3.6%	±0.7
Employed	69,155	±1,179	2,199	±430	3.2%	±0.6
Male	36,477	±702	865	±233	2.4%	±0.6
Female	32,678	±876	1,334	±371	4.1%	±1.1
Unemployed	2,465	±510	397	±167	16.1%	±6.5
Male	1,362	±306	294	±146	21.6%	±9.1
Female	1,103	±356	103	±68	9.3%	±6.3
WORK EXPERIENCE						
Population 16 years and over	102,656	±410	5,405	±661	5.3%	±0.6
Worked full-time, year-round in the past 12 months	51,513	±1,256	594	±239	1.2%	±0.5
Worked part-time or part-year in the past 12 months	23,761	±1,248	2,357	±465	9.9%	±1.9
Did not work	27,382	±1,015	2,454	±407	9.0%	±1.4
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	4,275	±972	(X)	(X)	(X)	(X)
125 percent of poverty level	11,020	±1,180	(X)	(X)	(X)	(X)
150 percent of poverty level	15,323	±1,651	(X)	(X)	(X)	(X)
185 percent of poverty level	20,239	±1,815	(X)	(X)	(X)	(X)
200 percent of poverty level	22,199	±1,910	(X)	(X)	(X)	(X)
300 percent of poverty level	44,214	±2,840	(X)	(X)	(X)	(X)
400 percent of poverty level	65,355	±2,518	(X)	(X)	(X)	(X)
500 percent of poverty level	85,965	±2,739	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED						
Male	9,989	±865	1,364	±282	13.7%	±2.8
Female	9,639	±762	1,829	±386	19.0%	±3.4
15 years	9	±17	9	±17	100.0%	±100.0
16 to 17 years	81	±74	81	±74	100.0%	±33.5
18 to 24 years	1,610	±356	390	±153	24.2%	±8.9
25 to 34 years	4,136	±565	739	±320	17.9%	±6.6
35 to 44 years	2,736	±434	424	±155	15.5%	±4.7
45 to 54 years	2,595	±510	305	±133	11.8%	±5.1
55 to 64 years	3,533	±496	706	±272	20.0%	±6.8
65 to 74 years	2,508	±407	266	±131	10.6%	±5.1
75 years and over	2,420	±412	273	±112	11.3%	±3.9
Mean income deficit for unrelated individuals (dollars)	7,321	±853	(X)	(X)	(X)	(X)

15. Language Data

	Boone County, Kentucky	
Label	Estimate	Margin of Error
Total:	115,625	±27
Speak only English	107,944	±710
Spanish or Spanish Creole:	3,070	±436
Speak English "very well"	1,688	±433
Speak English less than "very well"	1,382	±362
French (incl. Patois, Cajun):	479	±231
Speak English "very well"	395	±202
Speak English less than "very well"	84	±63
French Creole:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Italian:	44	±60
Speak English "very well"	25	±32
Speak English less than "very well"	19	±30
Portuguese or Portuguese Creole:	77	±74
Speak English "very well"	77	±74
Speak English less than "very well"	0	±27
German:	485	±225
Speak English "very well"	263	±130
Speak English less than "very well"	222	±144
Yiddish:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Other West Germanic languages:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Scandinavian languages:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Greek:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Russian:	36	±42
Speak English "very well"	12	±20
Speak English less than "very well"	24	±39
Polish:	1	±2
Speak English "very well"	1	±2
Speak English less than "very well"	0	±27
Serbo-Croatian:	72	±56
Speak English "very well"	49	±50
Speak English less than "very well"	23	±30
Other Slavic languages:	0	±27
Speak English "very well"	0	±27

	Boone County, Kentucky	
Label	Estimate	Margin of Error
Speak English less than "very well"	0	±27
Armenian:	62	±89
Speak English "very well"	0	±27
Speak English less than "very well"	62	±89
Persian:	17	±28
Speak English "very well"	17	±28
Speak English less than "very well"	0	±27
Gujarati:	173	±155
Speak English "very well"	155	±149
Speak English less than "very well"	18	±33
Hindi:	124	±164
Speak English "very well"	105	±134
Speak English less than "very well"	19	±33
Urdu:	110	±174
Speak English "very well"	60	±95
Speak English less than "very well"	50	±80
Other Indic languages:	31	±46
Speak English "very well"	31	±46
Speak English less than "very well"	0	±27
Other Indo-European languages:	83	±96
Speak English "very well"	6	±10
Speak English less than "very well"	77	±94
Chinese:	364	±206
Speak English "very well"	167	±107
Speak English less than "very well"	197	±166
Japanese:	907	±326
Speak English "very well"	378	±207
Speak English less than "very well"	529	±233
Korean:	16	±25
Speak English "very well"	0	±27
Speak English less than "very well"	16	±25
Mon-Khmer, Cambodian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Hmong:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Thai:	19	±31
Speak English "very well"	19	±31
Speak English less than "very well"	0	±27
Laotian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27

	Boone County, Kentucky	
Label	Estimate	Margin of Error
Vietnamese:	327	±215
Speak English "very well"	65	±75
Speak English less than "very well"	262	±204
Other Asian languages:	177	±129
Speak English "very well"	109	±85
Speak English less than "very well"	68	±62
Tagalog:	30	±44
Speak English "very well"	0	±27
Speak English less than "very well"	30	±44
Other Pacific Island languages:	9	±15
Speak English "very well"	9	±15
Speak English less than "very well"	0	±27
Navajo:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Other Native North American languages:	35	±37
Speak English "very well"	30	±35
Speak English less than "very well"	5	±10
Hungarian:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
Arabic:	283	±205
Speak English "very well"	235	±174
Speak English less than "very well"	48	±61
Hebrew:	0	±27
Speak English "very well"	0	±27
Speak English less than "very well"	0	±27
African languages:	425	±191
Speak English "very well"	284	±148
Speak English less than "very well"	141	±110
Other and unspecified languages:	225	±258
Speak English "very well"	96	±112
Speak English less than "very well"	129	±149

16. 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: Larisa Sims
Phone: 859-767-1421
Address: P.O. Box 752000
Cincinnati, OH 45275

Discriminación 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: Larisa Sims
Teléfono: 859-767-1421
Dirección: P.O. Box 752000
Cincinnati, OH 45275



U.S. Department of Transportation
Federal Aviation Administration

HC-101098