



RALEIGH-DURHAM AIRPORT AUTHORITY

TITLE VI PROGRAM

**Adopted November 2021
Revised September 2023**

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SECTION 1. POLICY STATEMENT

The Raleigh-Durham Airport Authority (Authority) 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 (Public Law 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.

The Authority 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. The Authority 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 the Authority will take action to involve them and the general public in the decision-making process.

The Authority requires nondiscrimination assurances, as prescribed by Federal Aviation Administration (FAA), from each tenant, contractor, and concessionaire providing an activity, service or facility under lease or contract. Assurances must be included in any related lease, contract, or franchise agreement between the Authority and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Thiané Carter is the Authority's Title VI Coordinator and is available at thiane.carter@rdu.com and at 919-840-7712. The Title VI Coordinator is responsible for initiating and monitoring the Authority'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.

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



President and CEO
Raleigh-Durham Airport Authority

2/28/2024

Date

____Sept. 28, 2026____
3-Year Expiration Date

SECTION 2. ADMINISTRATION

The President & CEO has reviewed and adopted this Title VI Plan on behalf of Authority. In accordance with FAA requirements, 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 name of the President and Chief Executive Officer or Title VI Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the President and CEO and resubmittal to FAA.

In addition to the Title VI Coordinator and the Authority's leadership, the following staff assists with the implementation of the Title VI program requirements:

Title VI Staff Liaison	Department
General Counsel	Legal
ADA Coordinator/ Paralegal	Legal
VP Concessions	Concessions
VP Facilities Asset Management	Facilities Asset Management
VP Buildings and Building Systems	Buildings and Building Systems
VP Marketing	Marketing and Customer Experience
VP Planning & Sustainability	Planning & Sustainability
VP Communications, Government and Community Affairs	Communications and Community Affairs
VP of IT Infrastructure	Information Technology
VP of Human Resources	Human Resources
Airport Security Coordinator	Operations

The Authority does not have subrecipients.

As of the date of this plan, the Authority does not have any pending applications for Federal financial assistance.

Updated information for pending and awarded grant applications will be available at <https://www.faa.gov/airports/aip/>.

SECTION 3. GRANT AND PROCUREMENT ASSURANCES

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

The Authority will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See the current [grant assurances](#) for more information.

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 [federal provisions](#) for more information. 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. The Authority requires through flow-down requirements in each of its contracts, civil rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements. The Authority periodically reviews subcontract agreements to ensure that the clauses are included.

The Authority's Legal, Compliance and Procurement Department (LC&P) advises all Authority departments on solicitations for bids, Requests for Proposals for work, or material subject to these assurances, and in all proposals for agreements, including airport concessions ("Solicitations"). LC&P drafts all agreements, contracts, covenants, deeds, leases, licenses, permits, and similar instruments ("Contracts") to which the Authority is a party as owner, lessor, concessionaire, grantor, or licensing or permitting authority.

The Authority updates its template documents upon notification from the FAA that there have been changes to the assurances. Annually, the Title VI Coordinator will collaborate with the Legal, Procurement and Compliance Department to review subcontractor agreements on a sample basis to assure requisite clauses are in place.

SECTION 4. TITLE VI COORDINATOR RESPONSIBILITIES

The Title VI 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 Section 11, Training for more information for required training for all staff.

Among other responsibilities, the Title VI Coordinator:

- a. Proactively ensures that the Authority is in compliance with nondiscrimination requirements of Title VI and reports to Authority leadership on the status of Title VI compliances.
- b. Responds promptly to requests by the FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI related requirements.
- c. Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, including any actions taken to resolve the matter.
- d. 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.
- e. Annually reviews the Authority's Title VI plan and disseminates Title VI information and education, throughout the Authority staff and leadership.
- f. 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 other methods described in the airport Community Participation Plan (CPP).
- g. 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.
- h. Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours. This regulation is available at: <https://tinyurl.com/49cfr21>

See Section 12 Compliance Reviews, Audits, Complaints, Lawsuits, and Other Investigations.

The Title VI Coordinator has access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>).

SECTION 5. NOTICE

49 CFR Part 21 Appendix C(b)(2)(ii)

The Authority will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. Guest Services and Properties ensures that these posters are visible, accessible and maintained via inspections. For more information about website accessibility, please visit www.ada.gov. The poster template is available [here](#) and a completed copy is included in Attachment 1: Non-Discrimination Poster.

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

The Authority will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by November 1, 2023 via email and hardcopy where applicable.

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

Terminal/FBO/Other Locations	Pre-Security	Post-Security	Other
Terminal 1	3	3	
Terminal 2	6	12	
Rental Car Agency Locations			4
Fixed Based Operators			1

Outreach to Affected Communities

Environmental and Planning, Communications, Government and Community Affairs (CGCA) and Legal ensures that notices for public meetings reach all segments of the impacted community. CGCA will identify effective media platforms to share announcements and notices. Announcements may be made on the Authority's website, via social media, in advertising online and/or print news, press release, emails to partners to share or directly to interested parties, and/or verbal announcements at community events. Environmental and Planning, Communications, Government and Community Affairs (CGCA) and Legal in conjunction with the appropriate Authority departments leading a given project, contacts leaders and representatives in Affected Communities¹ directly to confirm effective media platforms to reach all Affected Communities¹ and provide feedback

¹ Per FAA "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.

on translated materials. The Authority maintains records of all such notices and the efforts made to reach each of the Affected Communities.

To ensure that the community is effectively informed of and able to participate in public hearings, CGCA, Legal and Environmental and Planning includes public notices translated into appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include direction for obtaining an interpreter, free of charge, for public hearings. (See Section 6.03 Limited English Proficiency (LEP)).

The Authority will create a detailed CPP by December 31, 2023. A copy of the plan will be available at www.rdu.com.

SECTION 6. COMMUNITY STATISTICS

Title VI regulations require Federal grant recipients to know their community demographics (see 49 CFR § 21.9(b)). In doing so, the Authority needs to identify the communities eligible to be served, actually or potentially affected, benefited or burdened by the Authority's airport program.

Prior to undertaking certain development project, the Authority performs environmental reviews to identify potential impacts to low-income or minority populations. These reviews comply with FAA regulations and guidance or state and local regulations or laws as applicable. If federal, state or local regulations do not apply, the Authority will complete a Project Environmental Compliance Review (ECR) based to identify potential impacts. As a result, the Authority has conducted environmental reviews related to upcoming development projects. The results of these reviews are contained in the Environmental Assessment for the Runway 5L/23R Replacement Project (EA) and the Environmental Compliance Review Report for the Park Economy 3 project. The Authority has utilized the data reports as the basis for the "Community Statistics" described below.

From the ECR:

"The Project lies entirely on undisturbed, Airport-owned property and no project element has been identified that my directly or indirectly effect any low-income, minority, or Indian community" (Raleigh-Durham Airport Authority, 2023).

From the EA:

"For the purpose of this analysis, Wake County was used as the reference area because the Airport is located in Wake County and its community is relevant

to the demographic of the surrounding census block groups. The reference area, Wake County, contains 9.1 percent low-income and 40.0 percent minority populations... If a census block group's percentage of low-income and minority populations exceeds those of Wake County, the census block group was identified as potentially containing an EJ population." (Landrum & Brown, Inc., 2022).

As described in subsections from the EA, there are two Census Block Groups and Census Tracts which affect both low income and minority populations. Those areas are:

- **Block Group 1, Census Tract 536.09, Wake County, North Carolina**
- **Block Group 2, Census Tract 536.10, Wake County, North Carolina**

These Census Tracts include residential areas along Marcom Drive, Sorrell Grove Church Road, Pleasant Grove Church Road, Triple Oak Drive, and Nelson Road. (Hereafter, the above communities will be referred to collectively as "the Affected Communities").

Section 6.01 Low Income Communities²

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," the Authority is collecting information about affected and potentially affected low-income communities. Per the EA, **Block Group 1, Census Tract 536.09** has a low-income population of 10.6% (higher than Wake County's percentage of low-income population).

Census Block Group	Percent of Low-Income Population	Percent Minority Population	Poverty Rate
Block Group 1, Census Tract 536.09, Wake County North Carolina	10.6%	60.0%	13.9%
Block Group 2, Census Tract 536.10, Wake County North Carolina	4.3%	50.4%	6.6%

Source: Landrum & Brown, Inc.

Section 6.02 Racial and Ethnic Communities³

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 is described in the table below. Per the EA, **Block Group 2, Census Tract 536.10**, has been identified as a minority community.

Census Block Group	Not Hispanic						Hispanic	Total Minority
	White	Black/ African American	Native American/ Alaskan Native	Asian	Native Hawaiian or Pacific Islander	Other		
Block Group 1, Census Tract 536.09, Wake County North Carolina	40.0%	17.2%	0.0%	31.3%	0.0%	0.0%	11.5%	60.0%
Block Group 2, Census Tract 536.10, Wake County North Carolina	49.6%	23.5%	0.0%	9.7%	0.0%	4.4%	12.8%	50.4%

Source: Landrum & Brown, Inc.

Section 6.03 Limited English Proficiency (LEP)

The goal of all language access planning and implementation is to ensure that the Authority communicates effectively with limited English proficient individuals. Effective language access requires self-assessment and planning.

The threshold we have used for identifying the languages with significant LEP populations is based on the USDOT's Title VI enforcement regulations (49 CFR Part 21) and USDOT's LEP Policy Guidance² (Guidance⁴). The Guidance indicates a safe harbor threshold which is 5% or 1,000, whichever is less. The next table lists non-English languages that are spoken in LEP households in the Affected Communities⁵.

Census Block Group	Native Language (Speak English Less Than Well)	Percent
Block Group 1, Census Tract 536.09, Wake County North Carolina	Spanish	2.6%
Block Group 1, Census Tract 536.09, Wake County North Carolina	Hindi	0.6%
Block Group 1, Census Tract 536.09, Wake County North Carolina	Chinese	3.9%
Block Group 2, Census Tract 536.10, Wake County North Carolina	Chinese	0.9%
Block Group 2, Census Tract 536.10, Wake County North Carolina	Vietnamese	0.5%
Block Group 2, Census Tract 536.10, Wake County North Carolina	Arabic	0.3%

Source: Landrum & Brown, Inc.

The Authority estimates the frequency of contact with LEP individuals at the airport and airport-related activities that speak:

- **Spanish** - Several times a month (13 to 51 days a year)
- **Hindi** - A few times a year (12 or less days a year)
- **Chinese** - A few times a year (12 or less days a year)
- **Vietnamese** - A few times a year (12 or less days a year)
- **Arabic** - A few times a year (12 or less days a year)

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 annually⁶ using the U.S. Census Bureau as the data source for Languages Spoken in Affected Communities. This data is located at: <https://data.census.gov/cedsci/table?q=B16001&tid=ACSDT1Y2019.B16001>.

² Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, [70 Fed. Reg. 74087](#) (December 7, 2005).

Section 6.04 Beneficiary Diversity

Demographic information is collected using employee data, customer surveys and passenger data through voluntary disclosures.

Customer Experience conducts annual 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, including gender, age, household income, and race/ethnicity.

Section 6.05 Staff and Advisory Board Diversity

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures.

Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.

The Authority's Board members are asked to submit demographic information at the time of application. The Authority does not have a planning board.

SECTION 7. POTENTIAL OR KNOWN COMMUNITY IMPACTS

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. In general, no Authority 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 undertaken⁷. **The Authority has not identified any Affected Communities which will be impacted by existing airport facilities in use.**

The following facilities are expected to be constructed within the next three years.

- Runway 5L/23R & Taxiway B Replacement
- Park Economy 3 Expansion
- Aviation Parkway/National Guard Drive Interchange
- Taxiway E Rehabilitation
- Fuel Farm Improvement

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 Authority has not identified disparate impacts on Affected Communities related to the projects listed above.**

SECTION 8. LIMITED ENGLISH PROFICIENCY (Executive Order 13166)

In creating a Language Assistance Plan, the Authority will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

The threshold we have used for identifying the languages with significant LEP populations is based on DOT's Title VI enforcement regulations (49 CFR Part 21) and USDOT's LEP Policy Guidance³ (Guidance). The Guidance indicates a safe harbor threshold which is 5% or 1,000, whichever is less. The Authority's LEP analysis is contained in Attachment 2: Limited English Proficiency Analysis

Based on the Guidance, Spanish is the only language spoken by LEP population that meets the safe harbor threshold. The Authority encounters Spanish-speaking individuals each day.

The Title VI Coordinator will examine Language Line data annually to gather data on language requests from guests and ensure services are provided accordingly. Each department using the Language Line (including Guest Services, Central Communications, Law Enforcement, etc.) will provide usage data⁸.

Based on the above data, no additional languages have been identified as likely to be spoken by LEP airport guests.

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 Authority 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:

³ Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, [70 Fed. Reg. 74087](#) (December 7, 2005).

Translation Services

- All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials.
- The Authority will identify vendors to provide written translation services as needed.
- Information regarding translation services can be obtained at the Guest Services Desks pre- and post-security as well as the Authority's website.

Interpretation Services

- The Authority will identify vendors to provide written interpretation services as needed.
- Information regarding interpretation services can be obtained at guest services desks

The airport contracts with 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 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 coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is logged by Language Line, Inc.

SECTION 9. TRANSPORTATION

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

There were two Census Tracts identified as "Affected Communities" in Section 6, Community Statistics. The Authority has reviewed transit access provided by multiple agencies to the airport from these communities. These agencies include: GoTriangle, GoDurham, Capital Area Metropolitan Planning Organization (CAMPO), and the Town of Cary. Additionally, GoDurham provides multiple routes from Durham to the Airport. The Authority has engaged with each of these agencies to encourage transit services to these areas. The transit routes are determined solely by the respective transit agencies. Information about each transit agency and the communities which they service is available here:

GoTriangle: <https://gotriangle.org/>

GoDurham: <https://godurhamtransit.org/>

GoCary: <https://gocary.org/>

SECTION 10. MINORITY BUSINESS NOTIFICATION

Solicitations for concessions opportunities and other business opportunities are solicited from area minority and woman-owned businesses through the following methods: the Authority's website and distribution lists for organizations serving or representing minority-owned or women-owned businesses. Solicitations are also emailed to certified minority and women-owned small businesses. These methods are used for each formal solicitation regardless of type. **Attachment 3: Minority Business Notification provides a screenshot of representative projects and notifications. The Attachment also displays the Authority's Outreach Website and Sample Emails.**

Outreach to area minority and woman-owned businesses for contracting and subcontracting opportunities are performed through the following methods: outreach events, community newsletter, speaking engagements, educational programs, and pre-bid meetings.

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 requesting department.

SECTION 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 Title VI 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
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher information will be provided annually.

SECTION 12. COMPLIANCE REVIEWS, AUDITS, COMPLAINTS, LAWSUITS, AND OTHER INVESTIGATIONS

FAA Notification. The Title VI Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements⁹
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹⁰

As discussed in Section 13 Title VI Complaints, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, the Authority must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Title VI 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 Title VI Coordinator will also provide a statement about the outcome, unless previously provided.

SECTION 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 matters⁴
3. Allege misconduct by the Authority, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Authority 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 the Authority. Alternatively, they can file a formal complaint with an outside agency,

⁴ Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters.

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 Title VI Coordinator will log in the complaint and promptly send copies of the complaint to the Authority's General Counsel and President and CEO as well as the parties named in the complaint.

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

Thiané Carter, Title VI Coordinator
Raleigh-Durham Airport Authority
P.O. Box 80001
RDU Airport, NC 27623
E-mail: thiane.carter@rdu.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 Title VI 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 Title VI 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 Title VI Coordinator within 3 days.

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 Title VI Coordinator was notified). The Title VI 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 upload the information to the FAA Civil Rights Connect System. The Title VI Coordinator will also seek technical assistance from FAA, as needed, throughout

complaint intake, investigation, and resolution process.

Investigation Procedure

Assignment of Investigator. The Title VI Coordinator will immediately begin the investigation or designate an investigator.

Cooperation with FAA. The Title VI Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against the Authority, the Title VI Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Title VI 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 Title VI Coordinator may meet with the complainant to clarify the issues and obtain additional information, and speak with community members and potential witnesses, as appropriate.

Investigation Report. After completing the investigation, the Title VI Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Title VI Coordinator will consult with the Authority's General Counsel regarding the investigation and the report. The Authority's General Counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes. The Title VI Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through consultation with the Authority's Legal, Compliance and Procurement Department.

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 the Authority'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 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 Authority's President and CEO.

The appeal may be mailed or emailed to:
President & CEO
Raleigh-Durham Airport Authority
P.O. Box 80001
RDU Airport, NC 27623
E-mail: legal@rdu.com

The written appeal must be received within ten (10) 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 Authority's President and CEO 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, the Authority will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. Authority 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 the Title VI Coordinator.

This complaint procedure is shared with the public via the Authority's website at www.rdu.com.

SECTION 14. POPULATION/ LANGUAGE DATA

S1707: Poverty Status in the Past 12 Months	2021: ACS 1-Year Estimate Subject Tables					
	Wake County, North Carolina					
	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	1,131,039	±3,160	106,891	±12,260	9.5%	±1.1
AGE						
Under 18 years	264,541	±984	27,954	±7,268	10.6%	±2.7
Under 5 years	64,818	±767	7,383	±3,176	11.4%	±4.9
5 to 17 years	199,723	±771	20,571	±5,108	10.3%	±2.6
Related children of householder under 18 years	264,042	±1,100	27,496	±7,272	10.4%	±2.8
18 to 64 years	723,887	±3,102	68,379	±6,025	9.4%	±0.8
18 to 34 years	258,117	±2,920	35,482	±3,837	13.7%	±1.5
35 to 64 years	465,770	±807	32,897	±4,086	7.1%	±0.9
60 years and over	208,071	±4,037	16,318	±2,141	7.8%	±1.0
65 years and over	142,611	±436	10,558	±1,542	7.4%	±1.1
SEX						
Male	552,962	±2,717	49,125	±6,883	8.9%	±1.2
Female	578,077	±1,700	57,766	±7,625	10.0%	±1.3
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	667,627	±6,270	45,660	±6,539	6.8%	±1.0
Black or African American alone	210,419	±6,308	29,861	±6,581	14.2%	±3.1
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	90,787	±2,424	5,537	±2,049	6.1%	±2.3
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	57,601	±6,841	14,209	±5,300	24.7%	±8.7
Two or more races	100,698	±9,698	10,868	±3,829	10.8%	±3.7
Hispanic or Latino origin (of any race)	118,915	±772	26,143	±7,206	22.0%	±6.0

White alone, not Hispanic or Latino	651,814	±3,954	41,850	±5,243	6.4%	±0.8
EDUCATIONAL ATTAINMENT						
Population 25 years and over	774,160	±1,162	56,768	±5,434	7.3%	±0.7
Less than high school graduate	46,762	±5,054	12,573	±2,689	26.9%	±4.8
High school graduate (includes equivalency)	105,450	±6,606	14,323	±3,033	13.6%	±2.7
Some college, associate's degree	179,896	±8,698	15,575	±2,627	8.7%	±1.5
Bachelor's degree or higher	442,052	±9,102	14,297	±2,522	3.2%	±0.6
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	633,258	±8,384	40,487	±4,997	6.4%	±0.8
Employed	599,744	±9,125	31,094	±4,540	5.2%	±0.7
Male	318,826	±5,311	16,404	±3,398	5.1%	±1.0
Female	280,918	±7,109	14,690	±2,579	5.2%	±0.9
Unemployed	33,514	±4,036	9,393	±2,009	28.0%	±5.4
Male	15,910	±2,703	5,370	±1,701	33.8%	±7.8
Female	17,604	±3,309	4,023	±1,702	22.9%	±8.6
WORK EXPERIENCE						
Population 16 years and over	898,863	±3,608	81,128	±6,405	9.0%	±0.7
Worked full-time, year-round in the past 12 months	443,200	±8,942	10,838	±2,646	2.4%	±0.6
Worked part-time or part-year in the past 12 months	208,147	±8,940	29,533	±4,256	14.2%	±2.0
Did not work	247,516	±7,196	40,757	±3,763	16.5%	±1.4
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	55,585	±8,681	(X)	(X)	(X)	(X)
125 percent of poverty level	136,297	±13,223	(X)	(X)	(X)	(X)
150 percent of poverty level	166,694	±14,498	(X)	(X)	(X)	(X)
185 percent of poverty level	210,165	±16,013	(X)	(X)	(X)	(X)
200 percent of poverty level	230,016	±16,488	(X)	(X)	(X)	(X)
300 percent of poverty level	367,877	±16,201	(X)	(X)	(X)	(X)
400 percent of poverty level	497,312	±16,983	(X)	(X)	(X)	(X)
500 percent of poverty level	622,259	±16,652	(X)	(X)	(X)	(X)

UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	213,730	±9,948	46,241	±4,468	21.6%	±1.7
Male	104,209	±6,435	23,276	±3,764	22.3%	±3.0
Female	109,521	±6,086	22,965	±3,317	21.0%	±2.6
15 years	168	±276	168	±276	100.0%	±57.8
16 to 17 years	218	±235	218	±235	100.0%	±50.8
18 to 24 years	30,436	±2,883	15,855	±2,501	52.1%	±6.1
25 to 34 years	61,516	±4,530	8,241	±1,987	13.4%	±3.2
35 to 44 years	25,440	±3,668	4,278	±1,351	16.8%	±4.2
45 to 54 years	28,026	±3,524	4,950	±1,709	17.7%	±5.4
55 to 64 years	30,973	±3,576	7,087	±2,098	22.9%	±6.2
65 to 74 years	19,538	±2,089	2,840	±794	14.5%	±3.7
75 years and over	17,415	±2,175	2,604	±996	15.0%	±5.0
Mean income deficit for unrelated individuals (dollars)	8,697	±509	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	107,303	±6,559	5,353	±2,120	5.0%	±1.9
Worked less than full-time, year-round in the past 12 months	53,522	±4,729	18,301	±2,864	34.2%	±4.0
Did not work	52,905	±4,654	22,587	±2,912	42.7%	±4.3
Population in housing units for whom poverty status is determined	1,129,770	±3,191	105,830	±12,325	9.4%	±1.1

B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER		
	Wake County, North Carolina	
Label	Estimate	Margin of Error
Total:	1,084,606	±297
Speak only English	886,193	±8,471
Spanish:	87,837	±5,253
Speak English "very well"	51,315	±4,342
Speak English less than "very well"	36,522	±4,030
French (incl. Cajun):	5,713	±2,107
Speak English "very well"	3,168	±1,125
Speak English less than "very well"	2,545	±1,721
Haitian:	913	±728
Speak English "very well"	913	±728
Speak English less than "very well"	0	±224
Italian:	472	±334
Speak English "very well"	472	±334
Speak English less than "very well"	0	±224
Portuguese:	2,389	±1,303
Speak English "very well"	1,730	±997
Speak English less than "very well"	659	±580
German:	2,113	±1,146
Speak English "very well"	1,886	±1,121
Speak English less than "very well"	227	±243
Yiddish, Pennsylvania Dutch or other West Germanic languages:	651	±562
Speak English "very well"	651	±562
Speak English less than "very well"	0	±224
Greek:	849	±863
Speak English "very well"	562	±757
Speak English less than "very well"	287	±304
Russian:	4,906	±2,339
Speak English "very well"	4,194	±2,263
Speak English less than "very well"	712	±538
Polish:	1,134	±691
Speak English "very well"	892	±645
Speak English less than "very well"	242	±271
Serbo-Croatian:	155	±182
Speak English "very well"	155	±182
Speak English less than "very well"	0	±224
Ukrainian or other Slavic languages:	1,674	±999
Speak English "very well"	1,006	±641
Speak English less than "very well"	668	±700
Armenian:	62	±107
Speak English "very well"	62	±107
Speak English less than "very well"	0	±224

Persian (incl. Farsi, Dari):	2,569	±1,423
Speak English "very well"	1,899	±1,045
Speak English less than "very well"	670	±536
Gujarati:	5,312	±1,764
Speak English "very well"	4,177	±1,547
Speak English less than "very well"	1,135	±549
Hindi:	8,756	±2,675
Speak English "very well"	7,155	±2,295
Speak English less than "very well"	1,601	±1,032
Urdu:	2,402	±1,838
Speak English "very well"	2,208	±1,763
Speak English less than "very well"	194	±304
Punjabi:	2,443	±1,902
Speak English "very well"	1,539	±1,235
Speak English less than "very well"	904	±868
Bengali:	2,460	±2,068
Speak English "very well"	1,840	±1,803
Speak English less than "very well"	620	±508
Nepali, Marathi, or other Indic languages:	5,826	±2,057
Speak English "very well"	4,713	±1,759
Speak English less than "very well"	1,113	±610
Other Indo-European languages:	1,004	±607
Speak English "very well"	947	±565
Speak English less than "very well"	57	±98
Telugu:	8,763	±3,133
Speak English "very well"	7,708	±3,026
Speak English less than "very well"	1,055	±653
Tamil:	4,383	±2,051
Speak English "very well"	3,573	±1,866
Speak English less than "very well"	810	±597
Malayalam, Kannada, or other Dravidian languages:	3,485	±2,002
Speak English "very well"	2,781	±1,862
Speak English less than "very well"	704	±515
Chinese (incl. Mandarin, Cantonese):	10,317	±2,604
Speak English "very well"	6,121	±1,817
Speak English less than "very well"	4,196	±1,377
Japanese:	555	±469
Speak English "very well"	217	±275
Speak English less than "very well"	338	±340
Korean:	2,870	±1,139
Speak English "very well"	1,766	±832
Speak English less than "very well"	1,104	±805
Hmong:	0	±224
Speak English "very well"	0	±224
Speak English less than "very well"	0	±224
Vietnamese:	4,549	±1,657

Speak English "very well"	2,436	±1,034
Speak English less than "very well"	2,113	±897
Khmer:	0	±224
Speak English "very well"	0	±224
Speak English less than "very well"	0	±224
Thai, Lao, or other Tai-Kadai languages:	575	±388
Speak English "very well"	370	±301
Speak English less than "very well"	205	±252
Other languages of Asia:	585	±450
Speak English "very well"	462	±338
Speak English less than "very well"	123	±154
Tagalog (incl. Filipino):	2,230	±961
Speak English "very well"	1,524	±761
Speak English less than "very well"	706	±482
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	1,072	±1,061
Speak English "very well"	260	±225
Speak English less than "very well"	812	±977
Arabic:	9,972	±4,054
Speak English "very well"	6,012	±2,108
Speak English less than "very well"	3,960	±2,446
Hebrew:	0	±224
Speak English "very well"	0	±224
Speak English less than "very well"	0	±224
Amharic, Somali, or other Afro-Asiatic languages:	1,183	±1,119
Speak English "very well"	635	±684
Speak English less than "very well"	548	±645
Yoruba, Twi, Igbo, or other languages of Western Africa:	4,504	±2,403
Speak English "very well"	4,183	±2,371
Speak English less than "very well"	321	±531
Swahili or other languages of Central, Eastern, and Southern Africa:	2,618	±1,606
Speak English "very well"	2,040	±1,314
Speak English less than "very well"	578	±517
Navajo:	0	±224
Speak English "very well"	0	±224
Speak English less than "very well"	0	±224
Other Native languages of North America:	126	±207
Speak English "very well"	126	±207
Speak English less than "very well"	0	±224
Other and unspecified languages:	986	±745
Speak English "very well"	888	±732
Speak English less than "very well"	98	±160

Attachment 1: Non-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: Thiane Carter
Phone: 919-840-7712
Address: 1000 Trade Dr
Raleigh NC 27623

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: Thiane Carter
Teléfono: 919-840-7712
Dirección: 1000 Trade Dr
Raleigh NC 27623



U.S. Department of Transportation
Federal Aviation Administration

HQ-101058

Attachment 2: Limited English Proficiency Analysis

Title VI and Executive Order 13166 establish the manner in which recipients of federal funds must address the needs of LEP persons. Title VI prohibits national origin discrimination and, for this reason, obligates recipients to provide LEP individuals with meaningful access to their services, programs, and activities.

The Authority is committed to provide Limited English Proficient (LEP) individuals with meaningful access to its programs, services, and activities.

A Language Assistance Plan ("LAP") has been prepared to address the Authority's responsibilities as a recipient of federal financial assistance as it relates to the needs of individuals with limited English proficiency language skills. This LAP will be reviewed at least annually to ensure that it is current and sufficient to meet the needs of the Authority's LEP individuals.

Four-Factor Analysis

The methodology used to determine the language access needs and scope of services to be provided found in part one of this LAP is based on DOT's Title VI enforcement regulations (49 CFR Part 21) and USDOT's LEP Policy Guidance⁵. This Guidance recommends that DOT recipients apply a four-factor analysis for determining the reasonable steps necessary to ensure LEP persons have "meaningful access" to federally-funded programs and activities. These factors include:

1. The number or proportion of LEP individuals in the service area who may encounter or be served by the Airport.
2. The frequency with which LEP individuals come in contact with Airport services.
3. The nature and importance of services provided by the Authority to the LEP population.
4. The resources available to the Authority and overall cost to provide LEP assistance.

Factor #1: Number or proportion of LEP individuals in the service area

The number LEP individuals in the service area who may encounter or be served by the Authority can be described in terms of "catchment". Catchment is "...the geographic area from which your airport can reasonably expect to draw commercial air service passengers."⁶ Based on the Authority's research, its immediate catchment is the metropolitan statistical areas (MSA) of Raleigh and Durham – Chapel Hill. However, the Authority believes that its catchment is broader than these

⁵ Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 Fed. Reg. 74087 (December 7, 2005).

⁶ (Transportation Research Board Cooperative Research Programs, 2019)

communities based on the Authority's proximity to other airports, airfares and destinations offered, flight frequency and the presence of low-cost carriers in the marketplace. The broader catchment area includes the MSAs for Fayetteville, Greenville, Jacksonville, New Bern, Wilmington and Greensboro-High Point. This broader group fully describes the persons "eligible to be served, or likely to be directly affected, by" the Authority, its services and operations, i.e. the Authority's service area. The service area and the associated population (for 2017) is described below in **Table 1**. It should be noted that the catchment population described includes a large geographic area without considering the likelihood of airline travel by this population.

Table 1: RDUAA Service Area

Area	Population
Raleigh	1,330,483
Durham-Chapel Hill	569,360
Greensboro-High Point	761,963
Fayetteville	126,975
Wilmington	187,911
Jacksonville	383,538
Greenville	286,434
New Bern	180,140
Total Population	3,826,804

Source: Woods and Poole via Campbell-Hill Aviation Group, LLC

After defining the service area, the Authority determined the number or proportion of LEP individuals in the service area. The Authority reviewed the 2017 American Community Survey 5-Year Estimates from the U.S. Census Bureau. Specifically, the "Language Spoken At Home by Ability to Speak English for the Population 5 Years and Over" was reviewed. Based on a review of the Census data as described in **Table 2**, approximately 5.0% of the population in the Authority's service area speak English less than "very well".

Table 2: 2017 Language Spoken at Home by Location (5-Year Estimates)

Geographic Area Name	Population	Speak English "less than very well"	Percent speak English less than "very well"
Durham-Chapel Hill, NC Metro Area	517,580	37,159	7.2%
Fayetteville, NC Metro Area	354,987	13,185	3.7%
Greensboro-High Point, NC Metro Area	707,713	35,595	5.0%
Greenville, NC Metro Area	165,941	4,318	2.6%
Jacksonville, NC Metro Area	174,922	3,414	2.0%
New Bern, NC Metro Area	117,992	3,860	3.3%
Raleigh, NC Metro Area	1,192,576	68,118	5.7%
Wilmington, NC Metro Area	262,897	7,470	2.8%
Total Population	3,494,608	173,119	5.0%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

After reviewing the data on the population that speaks English less than "very well", the Authority reviewed the languages spoken by that population. As described in **Table 2**, the languages in which the speakers have the highest percentage of LEP individuals in relation to the general population are: Spanish, Chinese and Vietnamese respectively. (The categories described as "Other Asian and Pacific Island" and "Other Indo-European" are comprised of multiple languages, which cannot be easily isolated. "Other Asian and Pacific" languages include Thai, Hmong, Thai, Burmese, etc.; "Other Indo-European" languages include Italian, Portuguese, Dutch, etc. The complete list of languages included in these categories is included in Appendix A).

Table 3: 2017 Languages Spoken at Home and Limited English Proficiency (5-Year Estimates)

Languages Spoken	Total Language Population	Language as Percentage of Total Population	Speak English less than "very well"	Percent speak English less than "very well"
Spanish	265,376	7.6%	111,553	3.2%
Other Asian and Pacific Island	31,557	0.9%	11,422	0.3%
Other Indo-European	41,264	1.2%	10,305	0.3%
Chinese (incl. Mandarin, Cantonese)	21,720	0.6%	9,431	0.3%
Vietnamese	12,038	0.3%	6,750	0.2%
Other and unspecified	17,310	0.5%	5,159	0.1%
Arabic	13,035	0.4%	4,832	0.1%
Korean	9,016	0.3%	4,054	0.1%
French, Haitian, or Cajun	14,588	0.4%	3,590	0.1%
Russian, Polish, or other Slavic	9,232	0.3%	2,810	0.1%
Tagalog (incl. Filipino)	7,372	0.2%	1,929	0.1%
German or other West Germanic	11,710	0.3%	1,284	0.0%
Speak only English	3,040,390	87.0%		
Total Population	3,494,608		173,119	5.0%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Based on this information, Spanish-speaking LEP individuals are the most likely to be encountered at the airport. The Authority is most likely to encounter Spanish-speaking LEP individuals followed by Asian and Pacific Island language LEP individuals (including Chinese, Vietnamese and Korean).

Factor #2: The frequency with which LEP individuals come in contact with airport services

The Authority has attempted the frequency at which employees or others encounter LEP individuals in providing Airport services. In 2019, there were no documented requests for interpreters or translated documents.

The airport operates twenty-four hours per day each day with commercial flights operating primarily between the hours of 4:00 am and 11:00 pm daily. The number of international flights departing and arriving at the airport may affect the number of LEP individuals that encounter airport services. In 2018, almost 180,000 people arrived on international flights. The Authority provides non-stop service to several international destinations including Toronto, Montreal, Paris and London. This means that individuals may interact with any number of airport services within the terminals, including guest services, ticketing and baggage services, etc. In addition, the

Authority operates a variety of non-aeronautical services through which employees or business partners may encounter LEP individuals: curbside services, rental cars, shuttle services, concessions, etc. Therefore, at this time, it is difficult to estimate the frequency with which LEP individuals encounter airport services. **The Authority will maintain records to detail the frequency with which LEP individuals encounter airport services.**

Factor #3: The nature and importance of the program, activity, or service provided by the recipient to people's lives

The airport serves a large portion of the state as indicated by the locations described in the services area or catchment. In addition to serving as a mode of transportation to various international destinations, the Authority also serves as an employment hub and economic center in the region. The airport and related business operations and industries provide thousands of jobs to the state⁷. A review of the Census data indicates that some portion of these individuals speak a language in addition to English and there may be LEP individuals employed by the Authority, its tenants or associated vendors. **In its role as a transportation mode and employment center, the Authority provides various services to employees, passengers and visitors and the information by the Authority conveyed can range from directional and instructional to critical, depending on the context.** The Authority is committed to providing various methods of communication to travelers, employees and other individuals that may encounter the airport or its services.

Factor #4: The resources available to the Authority and overall cost to provide LEP assistance

The Authority has reviewed the various resources available to provide LEP assistance. These resources include: involves utilizing translation services for appropriate documents, phone-line interpreter contracts, volunteer language interpreters, and analyzing available staff language resources. Currently, the Authority has identified the following staff member or volunteer language resources:

- 10 Spanish
- 8 French
- 3 German
- 2 Hindi/Gujarati
- 1 Turkish

Further, the Authority is reviewing the services and costs associated with interpreter service vendors. **The Authority is committed to providing the resources needed to assist its LEP passengers through a combination of interpreter services and staff resources.**

⁷ (Findley, Head, & Bert, 2019)

LANGUAGE ASSISTANCE PLAN

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Authority services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. The Authority proposes a number of activities to provide language assistance.

Identification of LEP Persons

The Authority will provide staff with language identification or "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.

Further, the Authority will record past interactions with LEP persons, including the language spoken by the individual. All departments will be informally surveyed annually on their experience and frequency concerning any contacts with LEP persons during the previous year. Finally, the Authority will post notices in commonly encountered languages notifying LEP individuals of language assistance.

Language Assistance Measures

The Authority will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English. The following resources will be available to accommodate LEP persons:

- a. Interpretation Services: A list of the Authority's multilingual Guest Services employees is located in the terminals at all Information Desks.
- b. Pre-recorded health and safety announcements broadcast in Spanish, French and English (e.g., smoke-free environment, unattended luggage);
- c. Translation apps which are available on smartphones or other devices to provide basic live translation of information and to respond to general inquiries.

Language Assistance Measures

- a. The Authority engaged a language assistance vendor to provide interpretation and translation services.
- b. The Authority will provide an interpreter for public hearings upon request.
- c. The Authority will review all written documentation, including its website and signage using the USDOT's "safe harbor" guidelines, to determine which documents require translation.

Translation Services

Translation is the replacement of a written text from one language (the source language) into an equivalent written text in another language (the target language). The Authority analyzed the requirements to provide translations services based on

the US Department of Transportation (USDOT) policy guidance⁸. "Safe Harbor" guidance indicates that the Authority should provide "written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population eligible to be served or likely to be affected or encountered." **Based on the Authority's service area and LEP population, only the Spanish language would require translation services under "safe harbor" guidelines.**

The Authority recognizes that effective language assistance includes the translation of certain "vital documents" into the language of each frequently-encountered LEP group. Whether or not a document is "vital" depends on the importance of the program, information, encounter, or service involved and the consequence to the LEP person if the information is not accurate or timely.

Notice of Language Assistance Measures

The Authority will prepare a notice advising LEP persons of free language assistance. This notice will be available at the Information Desks in Spanish.

Staff Training

Per Federal guidelines Authority employees, specifically those having contact with the public, must be aware of their obligation to provide meaningful assistance to LEP individuals. The Authority has implemented training related to Title VI and the language assistance plan. The training initiative includes:

- a. An overview of Title VI and the Authority's responsibilities; and
- b. Documentation of language assistance requests and reporting to the Title VI coordinator.

Authority employees receive training during new employee orientation and annually thereafter. Concessions and airline station managers are informed of Title VI requirements and the LAP at least annually.

Authority employees are encouraged to participate in learning opportunities designed to highlight cultural diversity and meet language assistance needs using the learning management system.

Monitoring

The Authority will evaluate the LAP and language assistance measures annually. The evaluation and plan updates will include:

- a. The number of LEP individuals experienced annually;
- b. A review of the current LEP population in the service area;

⁸ (Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 2005)

- c. A review of the types of languages where translation or interpretation services have been requested;
- d. A review of any complaints received;
- e. A review of the employee training methods;
- f. Determination as to whether the need for translation services has changed;
- g. Determine whether language assistance programs have been effective and sufficient to meet the need.

Dissemination

The Authority's Title VI plan and LAP will be posted on the Authority's website. A copy of the LAP will be available in the Authority administrative building at 1000 Trade Drive, Raleigh, North Carolina 27623. Requests for copies of the plan should be directed to:

Title VI Coordinator
Raleigh-Durham Airport Authority
P.O. Box 80001
RDU Airport, NC 27623
E-mail: legal@rdu.com
Telephone: 919-840-7700

Table 4: Four and Forty-Two Group Classifications of Languages Spoken at Home with Examples (US Census Bureau, 2019)

Four Group Classification	Forty-Two Group Classification	Examples
Spanish	Spanish	Spanish, Ladino
Other Indo-European languages	French (incl. Cajun)	French, Cajun
	Haitian	Haitian
	Italian	Italian, Sicilian
	Portuguese	Portuguese, Kabuverdianu
	German	German, Luxembourgish
	Yiddish, Pennsylvania Dutch or other West Germanic languages	Dutch, Yiddish
	Greek	Greek
	Russian	Russian
	Polish	Polish
	Serbo-Croatian	Bosnian, Croatian, Serbian
	Ukrainian or other Slavic languages	Bulgarian, Czech, Ukrainian
	Armenian	Armenian
	Persian (incl. Farsi, Dari)	Iranian Persian (Farsi), Dari
	Gujarati	Gujarati
	Hindi	Hindi
	Urdu	Urdu
	Punjabi	Punjabi (Panjabi)
	Bengali	Bengali
	Nepali, Marathi, or other Indic languages	Nepali, Marathi, Konkani
	Other Indo-European languages	Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish
	Telugu	Telugu
	Tamil	Tamil
	Malayalam, Kannada, or other Dravidian languages	Malayalam, Kannada

Source: US Census Bureau

Four Group Classification	Forty-Two Group Classification	Examples
Asian and Pacific Island languages	Chinese (incl. Mandarin, Cantonese) Japanese Korean Hmong Vietnamese Khmer Thai, Lao, or other Tai-Kadai languages Other languages of Asia Tagalog (incl. Filipino) Ilocano, Samoan, Hawaiian, or other Austronesian languages	Mandarin Chinese, Min Nan Chinese (incl. Taiwanese), Yue Chinese (Cantonese) Japanese Korean Hmong Vietnamese Central Khmer (Cambodian) Thai, Lao Burmese, Karen, Turkish, Uzbek Tagalog, Filipino Cebuano (Bisayan), Hawaiian, Iloko (Ilocano), Indonesian, Samoan
All other languages	Navajo Other Native languages of North America Arabic Hebrew Amharic, Somali, or other Afro-Asiatic languages Yoruba, Twi, Igbo, or other languages of Western Africa Swahili or other languages of Central, Eastern, and Southern Africa Other and unspecified languages	Navajo Apache languages, Cherokee, Lakota, Tohono O'odham, Yupik languages Arabic languages Hebrew Amharic, Chaldean Neo-Aramaic, Somali, Tigrinya Akan (incl. Twi), Igbo (Ibo), Wolof, Yoruba Ganda, Kinyarwanda, Lingala, Swahili Hungarian, Jamaican Creole English, Unspecified

Attachment 3: Minority Business Notification

RDUAA Business Solicitation Website

Current Business Opportunities:

- > Public Affairs Agency
 - > Pre-Proposal Conference: July 13, 2023 at 11:30 a.m.
 - > Written Questions Due: July 17, 2023 at 2:00 p.m.
 - > Proposals Due: July 31, 2023 at 11:00 a.m.
 - > [Request for Proposals — General Provisions](#)
 - > [Request for Proposals — Solicitation Specific Provisions](#)
 - > [Request for Proposals — Required Forms](#)
 - > [Request for Proposals — Master Services Agreement](#)
- > Park Economy 3 Expansion – Bid Package 0 [Due date: Pre-bid conference – June 20 at 1:30 p.m.; Bids due July 11 at 2:00 p.m.]
- > Electric Transit Buses, Charging Stations, and Design and Construction Services
 - > IFB Advertise Date: June 12, 2023
 - > Pre-Bid Meeting: June 22, 2023, at 2pm EST
 - > Questions Due Date/Time: June 27, 2023, at 2pm EST
 - > IFB Due Date/Time: July 13, 2023, at 2 pm EST
 - > [Invitation for Bid](#)
 - > [Technical Specifications](#)
 - > [Compiled DBE Forms](#)
 - > [Basic Contract for Equipment](#)
 - > Specification Verification Form – [part 1](#), [part 2](#)
- > Terminal Curbfront Signage Improvements
 - > [Project Manual](#)
 - > [Signage Plans](#)
 - > [Addendum 1](#)
- > Prequalification Announcement – Park Economy 3 Expansion – Early Package [Due date: June 28, 2023]
 - > [Prequalification Announcement](#)

RDUAA Outreach Website

RDU Business Outreach Events

Raleigh-Durham Airport Authority regularly hosts workshops and presentations throughout the year to provide additional information on how to do business with the airport. Attendees can learn about upcoming projects and enjoy networking opportunities, including for certified diverse businesses.

[Learn about current business opportunities at RDU](#), or browse past events below for resources on business diversity outreach at the airport.

Introduction to Small Business Programs

- > [June 7, 2023 \(video\)](#)
- > [March 9, 2023](#)
- > [January 11, 2023](#)

August 23, 2023 – Business Opportunity Workshop

- > [Attendee List](#)
- > [Presentation](#)

Sample Email Notification

ADVERTISEMENT FOR BID: Balfour Beatty / Metcon has been selected as the Construction Manager at Risk (CMR) for the project and will receive bids from and contract with the principal contractors for the execution of the work.

A non-mandatory Prebid Conference and MWSB Workshop will be held on June 20, 2023, at 1:30PM at the following address. A site tour will immediately follow the Pre-Bid at 2:30PM. 200 Hales Branch Rd., Cary, NC 27513 You may also request a virtual invite to the meeting by emailing Trent Johnson at tjohnson@bbus.com or Page Martin at page.martin@bbus.com



Small Business Programs
Raleigh-Durham Airport Authority
smallbusiness@rdu.com
Visit rdu.com for upcoming business opportunities at RDU

Attachment 4: RDUAA Mandatory Annual Training

Month	Topic/Title	Content Owner	Target Audience
Q1	Sexual Harassment Prevention Made Simple and Respect Sexual & Gender Identity	HR	All Staff
	Office Ergonomics TBD	Risk	All Staff
	Understanding and Abiding by Title VI of the Civil Rights Act of 1964 and ADA Requirements	Legal	All Staff
Q2	Safety Housekeeping and Accident Prevention	Risk	All Staff
	Active Shooter	HR	All Staff except LE
	Fire Prevention in the Office	Risk	All Staff except LE
Q3	Cybersecurity Training	IS	All Staff
	Diversity & Inclusion	Legal	All Staff except Managers
	Diversity & Inclusion for Managers	Legal	Managers Only
	Workplace Violence Prevention	HR	All Staff except Managers
	Workplace Violence Prevention for Managers	HR	Managers Only
Q4	Evacuation Procedures	Risk	All Staff
	RDU Policy & Procedure Review	HR	All Staff
	Environmental Training	Sustainability	All Staff
	Manage Workplace Stress & Strike a Balance	HR	All Staff

FAA Required Notes
Included verbatim per FAA

¹ 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.

² 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.

³ Recommend using demographic groups from the U.S. Census.

⁴ 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.

⁵ 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.

⁶ 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.

⁷ 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.

⁸ 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.

⁹ 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.

¹⁰ 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.