

WILMINGTON INTERNATIONAL AIRPORT
Title VI Plan

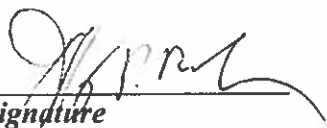
1. Title VI Policy Statement¹

Wilmington International Airport (ILM), 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.

ILM 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 Airport Sponsor 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, **ILM** will take action to involve them and the general public in the decision-making process.

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

Granseur Dick, available at 910-341-4333 and gdick@flyilm.com, is responsible for overseeing the Airport Sponsor’s compliance with Title VI and the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.


Signature
Jeffrey Bourk, AAE
Airport Director

09-30-2024
Effective Date

09-29-2027
3-Year Expiration Date

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

2. Administration

The **New Hanover County Airport Authority** has reviewed and adopted this Title VI Plan for **ILM**. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the Airport Director or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the **New Hanover County Airport Authority** and resubmittal to FAA.

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

Staff Supporting Title VI Program	Airport Sponsor Program / Office
Jeffrey Bourk	Airport Director
McKinnley Smith	Airport Operations Manager

Source: Airport staff

ILM has the following airport program sub-recipients:

Sub-Recipients
None

Source: Airport staff

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

Federal Source	Grant Number	Amount
FAA AIP	3-37-0084-067-2023	\$914,346
FAA AIP	3-37-0084-068-2023	\$2,323,442
FAA ATP	Pending	\$4,000,000
FAA AIG	Pending	\$13,594,364
FAA AIP	Application Soon (Terminal Phase 5 Design)	\$2,970,000
FAA AIG	Application Soon (Runway 6-24 Construction)	\$2,829,806

Source: Airport staff

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

Federal Source	Grant Number	Amount
None		

Source: Airport staff

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

3. Grant and Procurement Assurances

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

ILM 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. **ILM** requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

Description of Oversight Methods for Subcontracts

Subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Procurement Dept. to verify they include the template language, for not less than 10 percent of contractors each year.

4. Title VI Coordinator Responsibilities

The Coordinator is responsible for ensuring that they and other staff supporting the 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 Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to **ILM's** 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 the Airport Sponsor's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan.

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

5. Notice

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

ILM 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,² and maintained. The poster template is available at https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 15 Appendix.

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

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

ILM will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed once approved by the FAA via email and hard copies, where applicable.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
Main Terminal – Admin Copy Room & Finance Break Room	2		
ARFF Rescue Base	1		
Airport Maintenance Base	1		

Source: Airport staff

Outreach to Affected Communities

The Airport Administration ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify effective media platforms to share announcements and notices. Announcements are placed on the airport’s website (<https://flyilm.com>), in print at Airport Administrative Office, and on social media for special meetings as warranted. **Airport Administration** contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

ILM will create a detailed CPP by **September 30th, 2024**. A copy of the plan will be available at <https://flyilm.com/>.

To ensure that the community is effectively informed of and able to participate in public hearings, **Airport Administration** 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. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

³ We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term “protected communities” is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. § 47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

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, **ILM** will be able to identify, understand, and engage with communities. In doing so, **ILM** needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by **ILM**'s airport program.

Affected Communities⁴	Population
New Hanover County	221,999

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

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

We have identified the following facts about the Affected Communities:

Low Income Communities⁵

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” **ILM** is collecting information about affected and potentially affected low-income communities. According to **the U.S. Census Report, *S1701: Poverty Status in the Past 12 Months***, the overall poverty level for New Hanover County is approximately **12.7%**. The poverty rate is lower compared with the rest of the state of North Carolina (13.3%) The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
New Hanover County	12.7%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows⁶:

⁴ “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

⁵ Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low income communities in airport programs and activities.

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

Affected Community: New Hanover County
Total Affected Community 221,999

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	419	0%
Asian alone	2,830	1%
Black or African American alone	27,082	12%
Hispanic or Latino origin (of any race)	13,355	6%
Native Hawaiian and Other Pacific Islander alone	34	0%
Some other race alone	5,659	3%
Two or more races	10,298	5%
White alone	175,677	79%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

Limited English Proficiency (LEP).

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

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁸ The safe harbor for New Hanover County is 1,000. Please refer to the end of this document to find data for all languages in our community.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
Spanish	5,243	±688

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

⁷ Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

⁸ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

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

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
Spanish		X		
Chinese (incl. Mandarin, Cantonese)	X			
Arabic	X			
Korean	X			
French	X			

Source: Airport staff

Additional languages spoken by significant numbers of LEP persons in the Affected Communities, local schools, emergency service providers, and others, include:

Additional Languages Spoken

None

This information is updated annually⁹ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
U.S. Census Bureau	https://data.census.gov/table/ACSDT5Y2015.B16001?q=B16001&g=050XX00US37129

Beneficiary Diversity.

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

Description of Beneficiary Demographic Information Collection Methods

- Demographic data may be collected from participants at small business workshops, pre-bid meetings, and other public meetings by sign-in/attendance sheets.
- Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.
- The airport will include voluntary demographic questions on surveys to airport guests.

⁹ Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period.

Staff and Advisory Board Diversity.

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

Description of Employee and Advisory Board Demographic Information Collection Methods

- Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.
- Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through an online survey.

7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no ILM activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.¹⁰

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

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
Runway 6-24	Historic Downtown Wilmington, Kings Grant
Runway 17-35	Midtown Commercial District, UNCW
Passenger Terminal	Traffic Impacts to 23 rd Street
US Customs & Border Patrol Terminal & Ramp	Minimal – General Air Traffic
AeroCenter GA Terminal & Ramp	Minimal – General Air Traffic
Modern Aviation GA Terminal & Ramp	Minimal – General Air Traffic
Cape Fear Aviation Flight Center	Minimal – General Air Traffic

Source: Airport staff

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

¹⁰ 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.

Airport Facility Construction Projects

Affected Community Impacted by Construction of the Facility

Runway 6-24 Rehabilitation	Historic Downtown Wilmington, Kings Grant
Terminal Curbfront & Airport Blvd.	23 rd Street Corridor
Airport Business Park (Various Parcels)	23 rd Street Corridor

Source: Airport staff

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:

Facilities or Construction Projects with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
None		

Justifications:

Facilities or Construction Projects	Justification
Not Applicable	

8. Limited English Proficiency (LEP)

Executive Order 13166

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

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities

Language
Spanish

ILM also collects data for languages spoken by airport guests.¹¹ Data sources include:

¹¹ 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.

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Available multi-lingual Sheriff Dept Deputies	N/A
Available multi-lingual Airline Employees	N/A

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests:

Language
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 **ILM** of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

Translation Services:

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

Translation Vendors	Languages
Language Line/Google Translate	All above languages

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Available multi-lingual Sherrif Dept Deputies	Spanish
Available multi-lingual Airline Employees	Spanish

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Sheriff Office Front Desk	Spanish

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Any Sheriff Deputy on Duty	All Above Languages

Description of Interpretation Assistance Processes

Passengers requiring assistance may approach on-duty personnel and request assistance. Assistance is rendered through direct interpretation by bi-lingual employees when available or through Google Translate.

9. Transportation

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

Wave Transit does not currently provide service to the airport.

10. Minority Businesses

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

Bids for airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

Airport Business Opportunity	Minority Business Outreach Methods
Airport Concessions Contract (2 Total)	Advertised at local chambers of commerce, minority and woman owned business journals and participate at local minority business fairs.
Airport Construction Projects	Advertised through local and minority media publications.
Parking Management Services	Advertised through national, local and minority media publications.
Groundskeeping Services	Advertised at local chambers of commerce, minority and woman owned business journals and participate at local minority business fairs.

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 **Airport Administration and Finance Offices**.

11. Training

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age

- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- 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 requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

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, **ILM** must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Coordinator will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within 5 years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

¹² 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.

¹³ Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

13. 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 matters¹⁴
3. Allege misconduct by **ILM**, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by **ILM** 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 **ILM**.¹⁵ Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the **Airport Director**.

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

Granseur Dick, Deputy Airport Director – Operations & Facilities
1740 Airport Blvd, Suite 12
Wilmington, NC 28405
910-341-4333
gdick@flyilm.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.

¹⁴ 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.

¹⁵

Initial Procedure. The Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Coordinator will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within **7 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 Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will **upload the complaint information to the FAA Civil Rights Connect System**. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

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

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within **60 calendar days** after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

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

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

Prompt Resolution of Disputes. The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through review of written complaints. Review process includes consideration for Airport DBE, Minority & WOB goals, outreach efforts and achievements. Review may include hearings as required.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state **ILM'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 **Airport Director**.
- The written appeal must be received **within 30** 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 **Airport Director** will issue a final written decision in response to the appeal.

Avoiding Future Discrimination. In addition to taking action with respect to any specific instances of discrimination, **ILM** will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. **ILM** 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 **Granseur Dick**.

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

Website, In-person, and Other Distribution Methods

Airport website, Title VI Page, <https://flyilm.com/>

14. Population / Language Data

S1701: Poverty Status in the Past 12 Months

	New Hanover 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	221,999	±288	28,197	±2,191	12.7%	±1.0
AGE						
Under 18 years	40,696	±280	5,983	±1,021	14.7%	±2.5
Under 5 years	10,502	±45	1,275	±398	12.1%	±3.8
5 to 17 years	30,194	±282	4,708	±868	15.6%	±2.9
Related children of householder under 18 years	40,609	±301	5,896	±1,006	14.5%	±2.5
18 to 64 years	139,958	±149	18,943	±1,455	13.5%	±1.0
18 to 34 years	53,867	±120	10,039	±1,057	18.6%	±2.0
35 to 64 years	86,091	±149	8,904	±907	10.3%	±1.1
60 years and over	55,953	±806	5,052	±585	9.0%	±1.0
65 years and over	41,345	±120	3,271	±489	7.9%	±1.2
SEX						
Male	106,474	±329	12,613	±1,406	11.8%	±1.3
Female	115,525	±260	15,584	±1,274	13.5%	±1.1
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	175,677	±1,128	17,615	±1,725	10.0%	±1.0
Black or African American alone	27,082	±1,053	7,944	±1,363	29.3%	±4.6
American Indian and Alaska Native alone	419	±180	97	±71	23.2%	±18.4
Asian alone	2,830	±307	256	±170	9.0%	±6.2
Native Hawaiian and Other Pacific Islander alone	34	±42	0	±32	0.0%	±58.2
Some other race alone	5,659	±1,092	500	±239	8.8%	±4.4
Two or more races	10,298	±1,120	1,785	±561	17.3%	±5.2
Hispanic or Latino origin (of any race)	13,355	±243	1,977	±552	14.8%	±4.1
White alone, not Hispanic or Latino	170,304	±671	16,735	±1,675	9.8%	±1.0

EDUCATIONAL ATTAINMENT						
Population 25 years and over	156,634	±174	14,724	±1,226	9.4%	±0.8
Less than high school graduate	9,828	±1,036	2,308	±490	23.5%	±4.7
High school graduate (includes equivalency)	29,734	±1,595	4,957	±753	16.7%	±2.4
Some college, associate's degree	48,482	±1,874	4,520	±695	9.3%	±1.3
Bachelor's degree or higher	68,590	±2,161	2,939	±540	4.3%	±0.8
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	121,121	±1,763	9,894	±1,210	8.2%	±1.0
Employed	115,585	±1,971	8,256	±1,085	7.1%	±0.9
Male	58,306	±1,261	3,610	±756	6.2%	±1.3
Female	57,279	±1,446	4,646	±756	8.1%	±1.3
Unemployed	5,536	±891	1,638	±559	29.6%	±7.7
Male	3,415	±622	1,006	±497	29.5%	±11.6
Female	2,121	±474	632	±241	29.8%	±8.2
WORK EXPERIENCE						
Population 16 years and over	185,638	±420	22,737	±1,612	12.2%	±0.9
Worked full-time, year-round in the past 12 months	80,379	±1,953	1,914	±420	2.4%	±0.5
Worked part-time or part-year in the past 12 months	45,909	±1,741	8,732	±1,192	19.0%	±2.4
Did not work	59,350	±1,738	12,091	±992	20.4%	±1.3
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	14,206	±1,389	(X)	(X)	(X)	(X)
125 percent of poverty level	36,873	±2,382	(X)	(X)	(X)	(X)
150 percent of poverty level	47,578	±2,797	(X)	(X)	(X)	(X)
185 percent of poverty level	60,623	±3,112	(X)	(X)	(X)	(X)
200 percent of poverty level	65,557	±3,178	(X)	(X)	(X)	(X)
300 percent of poverty level	98,632	±3,478	(X)	(X)	(X)	(X)
400 percent of poverty level	128,251	±3,509	(X)	(X)	(X)	(X)

500 percent of poverty level	152,335	±3,277	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	62,662	±2,238	15,589	±1,409	24.9%	±2.0
Male	28,660	±1,493	6,908	±1,072	24.1%	±3.3
Female	34,002	±1,454	8,681	±918	25.5%	±2.5
15 years	0	±32	0	±32	-	**
16 to 17 years	87	±75	87	±75	100.0%	±36.2
18 to 24 years	12,610	±944	6,469	±912	51.3%	±6.4
25 to 34 years	12,745	±966	1,472	±410	11.5%	±3.2
35 to 44 years	6,598	±762	1,096	±356	16.6%	±5.0
45 to 54 years	6,877	±612	1,428	±330	20.8%	±4.4
55 to 64 years	8,908	±863	2,619	±492	29.4%	±4.6
65 to 74 years	8,043	±695	1,370	±353	17.0%	±4.1
75 years and over	6,794	±599	1,048	±223	15.4%	±3.2
Mean income deficit for unrelated individuals (dollars)	7,554	±515	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	28,002	±1,747	1,179	±350	4.2%	±1.2
Worked less than full-time, year-round in the past 12 months	15,705	±1,296	6,656	±1,071	42.4%	±5.2
Did not work	18,955	±1,200	7,754	±949	40.9%	±3.7
Population in housing units for whom poverty status is determined	221,017	±283	27,510	±2,187	12.4%	±1.0

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

**S16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR
THE POPULATION 5 YEARS AND OVER**

	New Hanover County, North Carolina	
Label	Estimate	Margin of Error
Total:	201,810	±106
Speak only English	186,479	±1,137
Spanish or Spanish Creole:	9,990	±780
Speak English "very well"	4,747	±554
Speak English less than "very well"	5,243	±688
French (incl. Patois, Cajun):	535	±172
Speak English "very well"	370	±124
Speak English less than "very well"	165	±124
French Creole:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Italian:	98	±75
Speak English "very well"	87	±69
Speak English less than "very well"	11	±13
Portuguese or Portuguese Creole:	305	±179
Speak English "very well"	176	±96
Speak English less than "very well"	129	±136
German:	484	±184
Speak English "very well"	435	±177
Speak English less than "very well"	49	±44
Yiddish:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other West Germanic languages:	72	±76
Speak English "very well"	64	±76
Speak English less than "very well"	8	±13

Scandinavian languages:	33	±33
Speak English "very well"	24	±28
Speak English less than "very well"	9	±13
Greek:	352	±192
Speak English "very well"	261	±148
Speak English less than "very well"	91	±80
Russian:	217	±142
Speak English "very well"	173	±125
Speak English less than "very well"	44	±39
Polish:	28	±32
Speak English "very well"	14	±23
Speak English less than "very well"	14	±22
Serbo-Croatian:	17	±27
Speak English "very well"	17	±27
Speak English less than "very well"	0	±28
Other Slavic languages:	10	±16
Speak English "very well"	10	±16
Speak English less than "very well"	0	±28
Armenian:	7	±11
Speak English "very well"	7	±11
Speak English less than "very well"	0	±28
Persian:	49	±43
Speak English "very well"	45	±38
Speak English less than "very well"	4	±8
Gujarati:	139	±154
Speak English "very well"	72	±93
Speak English less than "very well"	67	±71
Hindi:	43	±45
Speak English "very well"	20	±33
Speak English less than "very well"	23	±33
Urdu:	0	±28
Speak English "very well"	0	±28

Speak English less than "very well"	0	±28
Other Indic languages:	49	±59
Speak English "very well"	33	±47
Speak English less than "very well"	16	±27
Other Indo-European languages:	54	±45
Speak English "very well"	34	±34
Speak English less than "very well"	20	±28
Chinese:	497	±266
Speak English "very well"	280	±142
Speak English less than "very well"	217	±211
Japanese:	37	±39
Speak English "very well"	12	±15
Speak English less than "very well"	25	±30
Korean:	230	±136
Speak English "very well"	88	±57
Speak English less than "very well"	142	±97
Mon-Khmer, Cambodian:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Hmong:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Thai:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Laotian:	4	±8
Speak English "very well"	4	±8
Speak English less than "very well"	0	±28
Vietnamese:	468	±284
Speak English "very well"	115	±103
Speak English less than "very well"	353	±245
Other Asian languages:	716	±453

Speak English "very well"	412	±300
Speak English less than "very well"	304	±352
Tagalog:	385	±248
Speak English "very well"	353	±243
Speak English less than "very well"	32	±28
Other Pacific Island languages:	44	±45
Speak English "very well"	31	±39
Speak English less than "very well"	13	±20
Navajo:	0	±28
Speak English "very well"	0	±28
Speak English less than "very well"	0	±28
Other Native North American languages:	42	±56
Speak English "very well"	42	±56
Speak English less than "very well"	0	±28
Hungarian:	109	±136
Speak English "very well"	109	±136
Speak English less than "very well"	0	±28
Arabic:	129	±112
Speak English "very well"	107	±92
Speak English less than "very well"	22	±24
Hebrew:	74	±64
Speak English "very well"	64	±63
Speak English less than "very well"	10	±16
African languages:	101	±87
Speak English "very well"	101	±87
Speak English less than "very well"	0	±28
Other and unspecified languages:	13	±22
Speak English "very well"	13	±22
Speak English less than "very well"	0	±28

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Granseur Dick
Phone: 910-341-4333
Address: 1740 Airport Blvd, Suite 12
Wilmington, NC 28405

Discriminacion Ilegal

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

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

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

Coordinador: Granseur Dick
Teléfono: 910-341-4333
Dirección: 1740 Airport Blvd, Suite 12
Wilmington, NC 28405



U.S. Department of Transportation
Federal Aviation Administration

HQ-101098