Norfolk Airport Authority Title VI Plan

1. Title VI Policy Statement

Norfolk Airport Authority (ORF) 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.

ORF 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 Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use the airport. When it is anticipated that communities may be impacted by programs or activities, **ORF** will take action to involve them and the general public in the decision-making process.

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

Kia Moten, Inclusion and Diversity Manager, available at **757-857-3351** and kmoten@norfolkairport.com is responsible for overseeing the Airport Sponsor's compliance with Title VI and is the point of contact for all airport Title VI matters and related responsibilities, including those required by 49 CFR Part 21.



Signature
Mark Perryman
President & CEO

12-31-2023
Effective Date

12-31-2026
3-Year Expiration Date

2. Administration

The President/CEO of the Norfolk Airport Authority has reviewed and approved this Title VI Plan for Norfolk International Airport. This plan will be updated no less than once every 3 years.

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
Sheila Balli, Associate VP of Human Resources	ORF
Chief Marketing and Communications Officer (name TBA, currently vacant)	ORF

Source: Airport staff

Norfolk International Airport has the following airport program sub-recipients:

Sub-Recipients
None

Source: Airport staff

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

Project Name	Federal Source	Grant Number	Amount
Rehabilitate Runway 5/23 (Construction Phase 1)	*AIP*	*3-51-0036-080-2023*	*$13,670,853*
Pedestrian Bridge Moving Walkways	*AIG (AIP)*	*3-51-0036-081-2023*	*$2,127,676*

Source: Airport staff

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

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

3. Grant and Procurement Assurances

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

ORF 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. ORF 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 Finance 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 the Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the Airport Sponsor is in compliance with nondiscrimination requirements of Title VI and reports to ORF 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 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)

ORF will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible, and maintained. The poster is available at https://www.norfolkairport.com/wp-content/uploads/2021/07/discrimination_poster.pdf and a completed copy is attached. See Section 15 Appendix.

ORF has posted the above Title VI policy statement at each of its staff offices.

ORF will make Title VI Plan available to its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed after approval from the FAA by email and posted on the ORF website.

Posters are 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 Airport Lobby	*3*		
Arrivals	*2*		
Departures	*2*		
Terminal A		*2*	
Terminal B		*2*	
Garage A	*2*		
Garage D	*2*		
Fixed Base Operator Terminal	*2*		

Outreach to Affected Communities

The Administration and Marketing Departments will include impacted communities in the distribution of notices or public meetings. Announcements are made using a combination of social media, general circulation newspapers, community newspapers and email broadcast. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

ORF will create a detailed CPP by **December 30, 2023**. Upon FAA approval, a copy of the plan will be available in the **ORF Administration Office. A copy will also be available on the Norfolk Airport Authority website at https://www.norfolkairport.com/civilrights.**

To ensure that the community is effectively informed of and able to participate in public hearings, Administration and Marketing Departments may include 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.

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

Affected Communities	Population
East Ocean View (portion)	*1,559*
Camellia Gardens	*809*
Camellia Shores	*1493 Includes Gardens and Glengariff*
The Gardens	*See Camellia Shores*
Glengariff	*See Camellia Shores*
Azalea Acres/Azalea Lakes	*1,205*
Idlewood/Sandy Heights	*863*
Foxhall	*1,858*
River Oaks	*1,988*
Crown Point	*2,318*
Norfolk Industrial Park	*0 (Business Park – No residents)*
Norfolk Botanical Gardens	*0 (No Residents)*
Joint Expeditionary Base Little Creek-Fort Story (US Navy)	*1,647*
Diamond Springs Apartments (Virginia Beach)	*Included in Burton*
Airport Industrial Park (Virginia Beach)	*0 (Business Park – no residents)*
Burton (Virginia Beach)	*1,975*

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

(Hereafter, the above communities will be referred to collectively as "the Affected Communities"). The below demographics are identified using the geographical locations of: Block Group 2; Census Tract 65.02; Norfolk city; Virginia; Block Group 2; Census Tract 400; Virginia Beach city; Virginia; Block Group 2; Census Tract 66.05; Norfolk city; Virginia; Block Group 1; Census Tract 66.07; Norfolk city; Virginia; Block Group 2; Census Tract 66.07; Norfolk city; Virginia; Block Group 1; Census Tract 62; Norfolk city; Virginia; Block Group 1; Census Tract 59.03; Norfolk city; Virginia; Block Group 2; Census Tract 62; Norfolk city; Virginia; Block Group 1; Census Tract 9802; Norfolk city; Virginia; Block Group 1; Census Tract 70.01; Norfolk city; Virginia; Block Group 1; Census Tract 9803; Norfolk city; Virginia; Block Group 1; Census Tract 402; Virginia Beach city; Virginia

We have identified the following facts about the Affected Communities:

Low Income Communities.

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," ORF is collecting information about affected and potentially affected low-income communities. According to (U.S. Census Bureau "POVERTY STATUS IN THE PAST 12 MONTHS." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1701, 2020, the overall poverty level for the city of Norfolk is 17.8% and Virginia Beach is 7.2% . The poverty rate for the Affected Community is unknown as the data tables do not provide the necessary detail.

Affected Communities	Poverty Rate
None	

Source: U.S. Census Bureau, 2016-2020 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 follows:

Affected Community: See Above Table
Total Affected Community Population: *19,372 (per data source)*

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White alone	*7,648*	*39.5%*
Black or African American alone	*5,433*	*28.0%*
American Indian and Alaska Native alone	*19*	*0.1%*
Asian alone	*1,052*	*5.4%*
Native Hawaiian and Other Pacific Islander alone	*0*	*0%*
Some other race alone	*324*	*1.7%*
Two or more races	*1,239*	*6.4%*
Hispanic or Latino origin (of any race)	*2,418*	*12.5%*

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that ORF communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages that are spoken in LEP households in the Affected Communities. The data source is (U.S. Census Bureau. "HOUSEHOLD LANGUAGE BY HOUSEHOLD LIMITED ENGLISH SPEAKING STATUS." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16002, 2020).

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. The safe harbor for our community is 969 (5% of 19,372).

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
All Non-English Languages are below the threshold		

Source: U.S. Census Bureau, 2020 American Community Survey 5-Year Estimates

Frequency of LEP assistance 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 or Spanish Creole:	X			
Tagalog	X			

Source: ORF 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 annually 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/map?q=language&t=Language Spoken at Home&g=1500000US517100059031,517100062001,517100062002,517100065021,517100065022,517100066041,517100066042,517100066052,517100066071,517100066072,517100070011,517109802001,517109803001,518100400002,518100402001&tid=ACSDT5Y2015.B16002&layer=VT_2015_150_00_PY_D1&mode=thematic&loc=36.8933,-76.1997,z12.2866*
ORF Staff (for LEP assistance frequency)	

Beneficiary Diversity.

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

Description of Beneficiary Demographic Information Collection Methods
• *Participants at small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.* • *Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.* • *This data is included in the report title "Characteristics of Passengers Using Norfolk International Airport", last published January 2021.*

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
• *Demographic information is collected from staff during the onboarding process via ADP onboarding new hire system.* • *The City of Norfolk appoints and collects demographic information during the onboarding of Authority Board members.*

7. Potential or Known Community Impacts

Projects or services receiving federal financial assistance have the potential to impact others. Generally speaking, ORF's activity must avoid having a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. Activities having a disparate impact require a well-documented substantial legitimate nondiscriminatory justification. Impacts to protected communities must be avoided or minimized to the extent possible. For projects having a known discriminatory impact on protected communities ORF will demonstrate justification for the project and also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

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 5/23 (Adjacent Properties)	Camellia Shores Camellia Gardens The Gardens Glengariff Azalea Acres/Azalea Lakes Idlewood/Sandy Heights Burton (Station) Diamond Springs Apartments
Runway 5/23 (Flight Path)	Foxhall Crown Point River Oaks Norfolk Industrial Park JEB Little Creek – Fort Story
Main Terminal Complex (existing)	None

FBO	None
Federal Inspection Services Facility (existing)	None
Airport Hotel (to be constructed)	Botanical Gardens

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:

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
Departures Terminal Curbside Improvements	*None*
Consolidated Checkpoint	*None*

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
None	

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, ORF considers the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide. Please refer to the Community Statistics section of this plan for identification of languages spoken by LEP persons in Affected Communities.

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

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Language Marketplace Interpretation Services	*www.languagemarketplace.com*

Assistance requests to Norfolk Airport Authority	*N/A*

Source: Airport staff

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 the leadership and staff of ORF 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 Marketplace Interpretation Services	*www.languagemarketplace.com*

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Airport website translate view	*Arabic, Bengali, Chinese, Czech, Dutch, Filipino, French, German, Hindi, Indonesian, Italian, Japanese, Portuguese, Russian, Spanish, Turkish, Urdu and Vietnamese*

Source: Airport staff

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Language Marketplace	*All above languages*

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport information desks	*All above languages, using Language Marketplace and Airport staff*

Description of Interpretation Assistance Processes

- *The Airport Information Center maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient in providing interpretation and/or translation services. The list is updated annually and provided to all airport staff.*
- *The airport contracts with Language Marketplace Interpretation Services to provide on-demand telephone interpretation services to airport guests. Airport information desk staff use I-Speak materials to identify the language spoken by the airport customer. Staff then contact Language Marketplace operators to connect the customer to an interpreter.*

Detailed information is available in the Language Assistance plan.

9. Transportation

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

ORF has requested Hampton Roads Transit (HRT) to provide transit service access to the airport. HRT currently does not 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 Hotel	Airport Website, pre-bid meeting, media
Fixed Base Operator	Airport Website, pre-bid meeting, Airport Industry Trade Websites (AAAE and ACINA)
Rental Car Goods and Services	Annual Rental Car ACDBE Outreach
Concession	ACDBE Outreach, Airport Industry Trade Websites (AAAE, ACINA, ACC)
Construction Projects	Airport Website, pre-bid meeting, Airport Industry Trade Websites (AAAE, ACINA, and CGIEVA), eVA, FAA Matchmaker System

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 **Administration Office**.

11. Training

ORF conducts annual employee 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 requirements
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements

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, ORF will notify FAA contacts of any new investigations prior to grant execution.

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

13. Title VI Complaints

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 CFR 42.406(d)

Scope. These procedures are for complaints of discrimination under Title VI and related laws (hereafter "Title VI Complaints." In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters
3. Allege misconduct by ORF**,** including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by ORF 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 ORF. 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 Human Resources Department and the Executive Vice President/Chief of Staff.

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

Kia Moten, Inclusion and Diversity Manager
2200 Norview Avenue
Norfolk, VA 23518
757-857-3351
kmoten@norfolkairport.com

If a complaint is initially made by phone, it must be supplemented with a written complaint before **180** days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

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

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 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 into 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 ORF, 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. The Coordinator will attempt to resolve complaints informally or through means described in Prompt Resolution of Disputes below.

Preliminary Inquiry. The Coordinator will conduct a preliminary inquiry into the complaint to determine whether or not the complaint has sufficient merit to warrant an investigation. If the Coordinator determines that there is insufficient evidence to proceed, the complainant will be notified in writing of the decision within fifteen (15) business days. This notification shall state the reason(s) for the decision.

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 may 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 a combination of contract enforcement, rules and regulations adherence, negotiation, mediation and/or alternative dispute resolution.

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 ORF'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 ORF's Executive Vice President/Chief of Staff.
- The written appeal must be received within 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 Executive Vice President/Chief of Staff will issue a final written decision in response to the appeal within 30 business days.

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

Intimidation and Retaliation Prohibited. ORF 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 through the following methods:

Website, In-person, and Other Distribution Methods

1 *Airport website, Title VI page at* Title-VI-Complaint-Form-Norfolk-International-Airport-Norfolk-Virginia.pdf (norfolkairport.com)
2

14. 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: Kia Moten, Inclusion and Diversity Manager
Phone: (757) 857-3478
Address: Norfolk Airport Authority, Norfolk International Airport
2200 Norview Ave., Norfolk, VA 23518

Discriminacion Ilegal

Se prohibe 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 fisico 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: Kia Moten, Inclusion and Diversity Manager
Teléfono: (757) 857-3478
Dirección: Norfolk Airport Authority, Norfolk International Airport
2200 Norview Ave., Norfolk, VA 23518

U.S. Department of Transportation
Federal Aviation Administration

HQ-101098