Lehigh Valley International Airport (ABE) Title VI Plan

1. Title VI Policy Statement[1]

Lehigh Valley International Airport (ABE) 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.

Lehigh Valley International Airport 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. Anytime communities may be impacted by programs or activities the Lehigh Valley International Airport will take action to involve them and the general public in the decision-making process.

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

Colin Riccobon, available at 610-266-6001 and criccobon@flyabe.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
Ryan Meyer,
Director of Planning & Programming

10/15/2024
Effective Date

10/15/2027
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.

Plan de Título VI del Aeropuerto Internacional de Lehigh Valley (ABE)

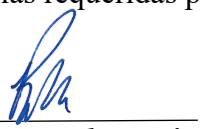
1. Declaración de política del Título VI[2]

El Aeropuerto Internacional de Lehigh Valley (ABE) asegura que ninguna persona por motivos de raza, color, origen nacional (incluido el dominio limitado del inglés (LEP)), sexo (incluida la orientación sexual e identidad de género), credo o edad, según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987 (PL 100.259), la Sección 520 de la Ley de Mejora de Aeropuertos y Vías Aéreas de 1982, y autoridades relacionadas (en adelante, "Título VI y requisitos relacionados"), ser excluidos de la participación, se les negarán los beneficios o ser objeto de discriminación en cualquier programa o actividad que reciba fondos del Departamento de Transporte de los Estados Unidos (DOT). El Título VI también prohíbe las represalias por hacer valer o participar en reclamos de discriminación.

El Aeropuerto Internacional de Lehigh Valley asegura además que se hará todo lo posible para garantizar la no discriminación en todos sus programas y actividades, ya sea que esos programas estén financiados por el gobierno federal o no. El Patrocinador del aeropuerto se compromete, entre otras cosas, a comprender las comunidades que rodean o se encuentran en la ruta de vuelo, así como a los clientes que utilizan el aeropuerto. Cada vez que las comunidades puedan verse afectadas por programas o actividades, el Aeropuerto Internacional de Lehigh Valley tomará medidas para involucrarlas a ellas y al público en general en el proceso de toma de decisiones.

El Aeropuerto Internacional de Lehigh Valley requiere garantías de no discriminación, según lo prescrito por la FAA, de cada inquilino, contratista y concesionario que proporcione una actividad, servicio o instalación en el aeropuerto. Las garantías deben incluirse en cualquier contrato de arrendamiento, contrato o acuerdo de franquicia relacionado entre el Aeropuerto Internacional de Lehigh Valley y cada inquilino, contratista y concesionario, así como en cualquier acuerdo similar con sus propios subarrendatarios y subcontratistas.

Colin Riccobon, disponible en el 610-266-6001 y criccobon@flyabe.com, es responsable de supervisar el cumplimiento del Título VI por parte del Patrocinador del aeropuerto y el punto de contacto para todos los asuntos relacionados con el Título VI del aeropuerto y las responsabilidades relacionadas, incluidas las requeridas por 49 CFR Parte 21.



10/15/2024

Fecha de entrada en vigor de **la firma**

Ryan Meyer,
Director de Planificación y Programación

10/15/2027

Fecha de caducidad de 3 años

[2] Esta declaración de política se traducirá a otros idiomas además del inglés, previa solicitud y en función de la demografía del usuario y del idioma local.

2. Administration

Lehigh-Northampton Airport Authority (LNAA) has reviewed and adopted this Title VI Plan for Lehigh Valley International Airport (ABE). 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 Director of Planning & Programming's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the LNAA 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
Ryan Meyer	Director, Planning & Programming
Thomas Stoudt	Executive Director
Elizabeth Marcon	LNAA Solicitor

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

Federal Source	Grant Number	Amount
N/A		

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)

Lehigh Valley International Airport 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. Lehigh Valley International Airport 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
LNAA includes the required federal contract provisions (latest iteration from the FAA) in all federal procurement documents and bid solicitations. All contractors submitting bids are required to confirm (sign-off) on all contract provisions – including the Title VI requirements. Once the lowest, responsive, responsible bidder has been selected and awarded the contract, a notice of award (NOA) letter is provided to the contractor. The NOA requires the contractor to submit all other required contractual documents (i.e. bonds, insurance, DBE plan, subcontractor agreements etc.). Once all of the NOA documents have been received, LNAA reviews and approves the documents prior to submitting the administrative notice to proceed (ANTP). The approval process includes a review of all subcontract agreements for conformance with the Title VI requirements and LNAA's overall master agreement with the contractor. The LNAA contract includes requirements for contractors to submit notification of a replacement subcontractor, to ensure the LNAA can review and approve prior to contract execution. Submission of the ANTP also includes the contract between the LNAA and the Contractor which is then executed through DocuSign.

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 Lehigh Valley International Airport 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)

Lehigh Valley International Airport 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,[3] 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.

Lehigh Valley International Airport has posted the above Title VI policy statement at its staff offices.

Lehigh Valley International Airport will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed within 30 days of FAA Approval. The plan will be posted to ABE's website (www.flyabe.com) in the LNAA Approved Documents section.

Posters are displayed in the 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
Above Drinking Fountain		2	
Baggage Claim	1		
Passenger Services Desk	1		
Ticket Counter Area	1		
FBO Lobby			1
People Security Bank Lobby			1
East Coast			1
New World Aviation			1

Outreach to Affected Communities

Public and Government Relations ensures that notices for public meetings reach all segments of the

[3] For more information about website accessibility, please visit ADA.gov.

impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are posted on the airports website and made in social media, general circulation newspapers, community newspapers, email broadcast, and Board Meetings are live-streamed on YouTube and available on the ABE YouTube Channel following the meetings. Public and Government Relations contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities[4] 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.

Detailed information on our public notice and outreach procedures is available in the Lehigh Valley International Airport CPP. A copy of the CPP is available at www.flyabe.com under LNAA approved documents. A copy of each CPP report completed since the last Title VI Plan is attached to this Title VI Plan.

Lehigh Valley International Airport will create a detailed CPP by December 31, 2024. A copy of the plan will be available at www.flyabe.com under LNAA approved documents.

To ensure that the community is effectively informed of and able to participate in public hearings, Public and Government Relations 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 directions for obtaining an interpreter, free of charge, for public hearings. 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

[4] 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, the Lehigh Valley International Airport will be able to identify, understand, and engage with communities. In doing so, the Lehigh Valley International Airport needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by Lehigh Valley International Airport's program.

Affected Communities[5]	Population
18014	12,364
18015	29,184
18017	39,871
18018	29,885
18020	20,327
18032	9,468
18037	7,279
18045	29,113
18049	18,727
18052	29,148
18055	11,606
18059	728
18064	26,304
18067	18,882
18080	11,246
18101	4,811
18102	51,245
18104	42,315
18106	6,673
18109	17,574
Total Population	**416,750**

(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 Communities[6].
A low-income area is an identifiable group of persons living in geographic proximity, whose median

[5] "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.

[6] 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.

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," Lehigh Valley International Airport is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, such as S1701: Poverty Status in the Past 12 Months, the overall poverty level for the zip codes, encompassing the entire area affected by and benefitting from the airport operations, that includes all of the Affected Communities is approximately 11.74%. The poverty rate remains similar compared with the rest of the State of Pennsylvania. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
18014	9.3%
18015	18.9%
18017	10.1%
18018	18.4%
18020	5.5%
18032	26.1%
18037	6.9%
18045	3.1%
18049	7.1%
18052	9.5%
18055	5.3%
18059	3.6%
18064	5.8%
18067	6.5%
18080	11.9%
18101	26.2%
18102	29.2%
18104	7.8%
18106	5.8%
18109	17.7%
Average Poverty Rate	**11.74%**

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[7]:

[7] Recommend using demographic groups from the U.S. Census.

Affected Community: 18014
Total Affected Community Population: 12,364

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	11,117	90.0%
Black or African American	359	2.9%
American Indian or Alaska Native	0	0.0%
Asian	25	0.2%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	450	3.6%
Hispanic or Latino	683	5.5%

Affected Community: 18015
Total Affected Community Population: 29,184

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	17,825	61.1%
Black or African American	3,281	11.2%
American Indian or Alaska Native	29	0.1%
Asian	1,193	4.1%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	3,159	10.8%
Hispanic or Latino	8,944	30.6%

Affected Community: 18017
Total Affected Community Population: 39,871

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	28,630	71.8%
Black or African American	2,317	5.8%
American Indian or Alaska Native	46	0.1%
Asian	1,331	3.3%
Native Hawaiian or Other Pacific Islander	10	0.0%
More than one	4,860	12.2%
Hispanic or Latino	9,750	24.5%

Affected Community: 18018
Total Affected Community Population: 29,885

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	22,299	74.6%
Black or African American	1,805	6.0%
American Indian or Alaska Native	79	0.3%
Asian	389	1.3%
Native Hawaiian or Other Pacific Islander	1	0.0%
More than one	2,770	9.3%
Hispanic or Latino	8,402	28.1%

Affected Community: 18020
Total Affected Community Population: 20,327

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	16,432	80.8%
Black or African American	594	2.9%
American Indian or Alaska Native	7	0.0%
Asian	1,060	5.2%
Native Hawaiian or Other Pacific Islander	108	0.5%
More than one	1,361	6.7%
Hispanic or Latino	2,734	13.5%

Affected Community: 18032
Total Affected Community Population: 9,468

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	7,924	83.7%
Black or African American	410	4.3%
American Indian or Alaska Native	0	0.0%
Asian	0	0.0%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	970	10.2%
Hispanic or Latino	1,656	17.5%

Affected Community: 18037
Total Affected Community Population: 7,279

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	6,208	85.3%
Black or African American	61	0.8%
American Indian or Alaska Native	15	0.2%
Asian	3	0.0%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	841	11.6%
Hispanic or Latino	1,138	15.6%

Affected Community: 18045
Total Affected Community Population: 29,113

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	23,595	81.0%
Black or African American	864	3.0%
American Indian or Alaska Native	46	0.2%
Asian	1,535	5.3%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	1,862	6.4%
Hispanic or Latino	3,978	13.7%

Affected Community: 18049
Total Affected Community Population: 18,727

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	16,820	89.8%
Black or African American	525	2.8%
American Indian or Alaska Native	3	0.0%
Asian	391	2.1%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	731	3.9%
Hispanic or Latino	1,178	6.3%

Affected Community: 18052
Total Affected Community Population: 29,148

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	20,662	70.9%
Black or African American	2,050	7.0%
American Indian or Alaska Native	27	0.1%
Asian	1,196	4.1%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	4,136	14.2%
Hispanic or Latino	6,029	20.7%

Affected Community: 18055
Total Affected Community Population: 11,606

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	10,334	89.0%
Black or African American	166	1.4%
American Indian or Alaska Native	15	0.1%
Asian	143	0.1%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	489	4.2%
Hispanic or Latino	1,119	9.6%

Affected Community: 18059
Total Affected Community Population: 728

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	705	96.8%
Black or African American	0	0.0%
American Indian or Alaska Native	0	0.0%
Asian	17	2.3%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	6	0.8%
Hispanic or Latino	0	0.0%

Affected Community: 18064
Total Affected Community Population: 26,304

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	23,984	91.2%
Black or African American	494	1.9%
American Indian or Alaska Native	7	0.0%
Asian	775	2.9%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	896	3.4%
Hispanic or Latino	1,183	4.5%

Affected Community: 18067
Total Affected Community Population: 18,882

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	16,664	88.3%
Black or African American	224	1.2%
American Indian or Alaska Native	45	0.2%
Asian	227	1.2%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	1,230	6.5%
Hispanic or Latino	1,766	9.4%

Affected Community: 18080
Total Affected Community Population: 11,246

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	10,632	94.5%
Black or African American	46	0.4%
American Indian or Alaska Native	0	0.0%
Asian	73	0.6%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	182	1.6%
Hispanic or Latino	835	7.4%

Affected Community: 18101
Total Affected Community Population: 4,811

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	1,815	37.7%
Black or African American	1,030	21.4%
American Indian or Alaska Native	7	0.1%
Asian	97	2.0%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	995	20.7%
Hispanic or Latino	2,572	53.5%

Affected Community: 18102
Total Affected Community Population: 51,245

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	18,698	36.5%
Black or African American	7,625	14.9%
American Indian or Alaska Native	331	0.6%
Asian	353	0.7%
Native Hawaiian or Other Pacific Islander	2	0.0%
More than one	12,405	24.2%
Hispanic or Latino	36,115	70.5%

Affected Community: 18104
Total Affected Community Population: 42,315

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	30,405	71.9%
Black or African American	2,861	6.8%
American Indian or Alaska Native	124	0.3%
Asian	3,438	8.1%
Native Hawaiian or Other Pacific Islander	25	0.0%
More than one	1,907	4.5%
Hispanic or Latino	3,555	8.4%

Affected Community: 18106
Total Affected Community Population: 6,673

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	5,264	78.9%
Black or African American	316	4.7%
American Indian or Alaska Native	0	0.0%
Asian	414	6.2%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	481	7.2%
Hispanic or Latino	994	14.9%

Affected Community: 18109
Total Affected Community Population: 17,574

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
White	9,973	56.7%
Black or African American	2,045	11.6%
American Indian or Alaska Native	23	0.1%
Asian	336	1.9%
Native Hawaiian or Other Pacific Islander	0	0.0%
More than one	1,754	10.0%
Hispanic or Latino	9,257	53.7%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that Lehigh Valley International Airport communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages[8] that are spoken in LEP households in the Affected Communities. The data source is the American Community Survey.

[8] 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.

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.[9] The safe harbor for our community 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	21674	+/-4254
Arabic	2232	+/-1321

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**
French		**X**		
Chinese			**X**	

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[10] 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/cedsci/table?q=B16001&tid=ACSDT1Y2019.B16001
LNAA Customer Service Surveys	N/A
Website Accessibility & Language Reports	N/A

[9] 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.

[10] 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.

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
• Airport Customer Experience Office conducts biannual 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. • LNAA utilizes www.PennBID.net for soliciting bids and proposals. Businesses that submit bids are registered with the service, and LNAA receives their demographic information through their profile and submitted bids if it was provided. • Voluntary demographic Data is collected at various business and community meetings via surveys.

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. • The LNAA Board of Governors Recording Secretary informally gathers demographic information when members are appointed. • Voluntary demographic Data is collected at various business and community meetings via surveys.

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 Lehigh Valley International Airport 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.[11]

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 Pavement Rehabilitation	None
TSA Security Checkpoint Expansion	None
Acquire Passenger Boarding Bridges	None

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
Rehabilitate Taxiway A	None
Terminal Roadway Rehabilitation	None
Terminal Modernization / ADA Improvements	None
Rehabilitate Air Carrier Apron	None
Replace Maintenance Facility Fuel Tanks	None
Taxiway D Construction	None
Construct Parking Garage	None
Rehabilitate & Realign Terminal Roadways	None

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:

[11] 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.

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, the **Lehigh Valley International Airport** 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
Arabic

Lehigh Valley International Airport also collects data for languages spoken by airport guests.[12] Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Survey of Airport Tenants and Vendors	N/A

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

Language
Spanish
French
Chinese

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 Lehigh Valley International Airport 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:

[12] 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.

Translation Vendors	Languages
Voluntary Bi-Lingual Employees & Airport Stakeholders	Spanish
Google Translate	All above languages

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
Voluntary Bi-Lingual Employees & Airport Stakeholders	Spanish
Google Translate	All above languages

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
Voluntary Bi-Lingual Employees & Airport Stakeholders	Spanish
Google Translate	All above languages

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
Airport Language Assistance page	All above languages
Google Translate	All above languages

Description of Interpretation Assistance Processes

When a request for an interpreter is received, the Airport Customer Experience Office follows this process:

1. Staff presents I-Speak language card to identify the language spoken by the airport guest.
2. Staff then contacts airport employee that is proficient in the requested language, or utilizes Google Translate for interpretation.
3. If no staff are proficient or available for interpretation, the LNAA will utilize the Interpreters and Translators, Inc. call line to provide assistance. The LNAA will provide the use of their telephone system as needed. The completed call is then logged by the Airport Customer Experience Office.
4. Additionally, the LNAA and TSA can share resources for language interpretation assistance, which include multiple bi-lingual TSA employees and technologies that are available at the TSA Security Checkpoint.

Airport Customer Experience Office maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated annually by the Title VI Coordinator and provided to the Passenger Service, Customer Service, and Operations Center front-line employees. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.

9. Transportation

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

In the Community Statistics section of this plan, we identified Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

We have coordinated with Lanta and Transbridge to encourage them to provide transit service access between the airport and these areas.

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

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing
18015	Fixed-route buses	Existing
18017	Fixed-route buses	Existing
18018	Fixed-route buses	Existing
18032	Fixed-route buses	Existing
18037	Fixed-route buses	Existing
18045	Fixed-route buses	Existing
18052	Fixed-route buses	Existing
18055	Fixed-route buses	Existing
18101	Fixed-route buses	Existing
18102	Fixed-route buses	Existing
18109	Fixed-route buses	Existing

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 Operations Dispatcher	Posted on airports website, Indeed, Social Media
Administrative Assistant	Posted on airports website, Indeed, Social Media
Airline Services Commissary Agent	Posted on airports website, Indeed, Social Media
Airline Services Customer Service	Posted on airports website, Indeed, Social Media

Ticket Agent	
Custodian	Posted on airports website, Indeed, Social Media
Customer Service Representative	Posted on airports website, Indeed, Social Media
Flight Line Technician Fueler	Posted on airports website, Indeed, Social Media
Line Service Technician Fueler	Posted on airports website, Indeed, Social Media
Marketing / Advertising Intern	Posted on airports website, Indeed, Social Media
Operations Manager	Posted on airports website, Indeed, Social Media
Parking Supervisor	Posted on airports website, Indeed, Social Media
Passenger Services Agent	Posted on airports website, Indeed, Social Media
Passenger Services Supervisor	Posted on airports website, Indeed, Social Media
AIP projects	Posted on airports website, www.pennbid.net, Bids required to include disadvantaged business component
Concession Opportunities	Posted on airports website, www.pennbid.net, Bids required to include Airport Concessions disadvantaged business component

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 Planning & Programming Department.

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 pertaining to the Title VI process 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[13]
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements[14]

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, Lehigh Valley International Airport 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.

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[15]
3. Allege misconduct by the Lehigh Valley International Airport, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Lehigh Valley International Airport including airport employees, contractors, concessionaires, lessees, or tenants.

[13] 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.

[14] 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.

[15] 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.

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 Lehigh Valley International Airport.[16] 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 Executive Director and Human Resources.

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

Colin Riccobon
3311 Airport Road
Allentown PA 18109
610-266-6001
Email: criccobon@flyabe.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 2 – 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 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 information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance

[16] Complaint form is located at www.flyabe.com/civilrights

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 Lehigh Valley International Airport, 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 a review and determination for resolution would be discussed with the LNAA Airport Executive Staff, LNAA Solicitor, and any organization/representative from the affected community.

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 Lehigh Valley International Airport'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's Executive Director.
- 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 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, the Lehigh Valley International Airport will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. Lehigh Valley International Airport 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 Colin Riccobon.

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

Website, In-person, and Other Distribution Methods

1 www.flyabe.com/civilrights

14. Population / Language Data

15. Completed Unlawful Discrimination Poster