

Wayne County Airport Authority
Detroit Metropolitan Wayne County Airport (DTW) Title VI Plan - 2023


1. Title VI Policy Statement¹

The Wayne County Airport Authority (WCAA) 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.

The Wayne County Airport Authority further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not including any programs or activities of our sub-recipients. The Airport Sponsor agrees, among other things, to understand the communities surrounding or in the flight path, as well as customers that use Detroit Metropolitan Wayne County Airport (DTW). Any time communities may be impacted by programs or activities the Wayne County Airport Authority will take action to involve them and the general public in the decision-making process.

The Wayne County Airport Authority 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 The Wayne County Airport Authority and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Darrell J. Dinges, the Title VI Coordinator is available at (734) 247-7370 and Accessibility@wcaa.us, 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
Chad Newton, CEO
Wayne County Airport Authority

May 17, 2023
Effective Date

May 17, 2026
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 Wayne County Airport Authority Board of Directors has reviewed and adopted this Title VI Plan for the Detroit Metropolitan Wayne County Airport (DTW). 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 CEO's or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the Wayne County Airport Authority Board of Directors 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
<i>Michael O'Sullivan</i>	<i>Planning, Construction & Design</i>
<i>Scott Roberts</i>	<i>Financial Planning & Analysis</i>
<i>Karen Souders</i>	<i>Planning, Construction & Design</i>
<i>Raynard Jones</i>	<i>Legal</i>
<i>Robin Hovious</i>	<i>Controller's Office</i>
<i>Nicole Martin</i>	<i>Procurement</i>
<i>Matthew Virost</i>	<i>External Affairs</i>
<i>Mike Bangs</i>	<i>Human Resources</i>
<i>Christine Lindenmuth</i>	<i>Concessions</i>
<i>Jonathan James</i>	<i>Technical Services</i>
<i>Kristy Exner</i>	<i>Authority Governance</i>
<i>Tim McDonald</i>	<i>Public Safety / Security</i>
<i>Erica Donerson</i>	<i>External Affairs</i>
<i>Jason Wade</i>	<i>Concessions</i>
<i>Daniel Alanis</i>	<i>Internal Audit</i>

The Wayne County Airport Authority has no sub-recipients.

As of the date of this plan, the Wayne County Airport Authority has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
<i>AIP</i>	<i>Unassigned</i>	<i>\$6,242,697</i>
<i>BIL ATP</i>	<i>Unassigned</i>	<i>\$35,360,000</i>
<i>BIL ATP</i>	<i>Unassigned</i>	<i>\$2,000,000</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$787,848</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$6,375,000</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$10,378,199</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$3,829,500</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$5,625,000</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$2,565,000</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$18,300,000</i>
<i>AIP</i>	<i>Unassigned</i>	<i>\$6,242,697</i>

“In addition, the Wayne County Airport Authority’s sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT): None.

Updated information for pending and awarded grant applications will be available through the following methods: None.

3. Grant and Procurement Assurances

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

The Wayne County Airport Authority (WCAA) 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.

The Wayne County Airport Authority requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

WCAA Procurement has a number of solicitation methods:

- *Request for Bids (RFB)*
- *Request for Proposals (RFP)*
- *Request for Qualifications (RFQ)*
- *Solicitation for Quotes (SFQ)*

All have standard templates with Title VI clauses as part of the standard language. Reviews of the templates as well as the WCAA Terms and Conditions addendum is completed on an annual basis by the Procurement and Legal Departments as well as the Title VI Coordinator.

- *Cooperative Purchasing Arrangements (Coop)*

This format typically uses a contract document negotiated by the lead agency, but Title VI clauses are added via Addendum in the standard WCAA Terms and Conditions.

Description of Oversight Methods for Subcontracts

Current Nondiscrimination Requirements and referenced Nondiscrimination Acts and Authorities must be used in all subcontracts related to the airport program. Subcontracts are audited by the Title VI Coordinator with assistance of the Procurement Dept. to verify they include the template language, for not less than 10 percent of contractors each year.

Shaded paragraph above revised 09.26.2023

Initialed: *Chad Newton* Chad Newton, CEO, Wayne County Airport Authority

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 Wayne County Airport Authority 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)

The Wayne County Airport Authority will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on Detroit Metropolitan Wayne County 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.

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

The Wayne County Airport Authority will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by email, tenants meeting, and available on the DTW Metro Airport website after FAA review and approval.

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

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
<i>Evans Terminal</i>	3	2	
<i>McNamara Terminal</i>	6	6	
<i>Westin Hotel</i>			1
<i>Car Rental Offices</i>			8

Outreach to Affected Communities

External Affairs ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made as appropriate via press releases, general circulation newspapers, community newspapers, email broadcast, and on the airport website. As part of the forthcoming Community Participation Plan (CPP) the External Affairs department

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

will develop a process to contact 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.

Wayne County Airport Authority will create a detailed Community Participation Plan (CPP) by the date scheduled by the FAA. A copy of the plan will be available at www.metroairport.com.

To ensure that the community is effectively informed of and able to participate in public hearings at board meetings, Authority Governance includes public notices translated into appropriate languages, including as requested for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such 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, the Wayne County Airport Authority will be able to identify, understand, and engage with communities. In doing so, the Wayne County Airport Authority needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by the airport program at Detroit Metropolitan Wayne County Airport.

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.

Affected Communities⁴	Population
<i>Van Buren Township (48111)</i>	40,900
<i>Dearborn Southwest (48214)</i>	28,504
<i>Dearborn Heights South (48125)</i>	19,860
<i>Dearborn Heights North (48127)</i>	35,099
<i>Dearborn West (48128)</i>	10,813
<i>Garden City (48135)</i>	26,476
<i>Inkster (48141)</i>	24,199
<i>Huron Township (48164)</i>	8,803
<i>Romulus (48174)</i>	30,623
<i>Taylor (48180)</i>	60,333
<i>Wayne (48184)</i>	16,811
<i>Westland South (48186)</i>	34,610
<i>Canton South (48188)</i>	42,836

(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,” Wayne County Airport Authority is collecting information about affected and potentially affected low-income communities. According to *U.S. Census Report, such as §1701: Poverty Status in the Past 12 Months*, the overall poverty level for the *Metro Detroit* is approximately 13.8%. The poverty rate remains similar compared with the rest of the *State of Michigan* at 13.7%. The poverty rates for the specific Affected Communities are as follows.

Affected Communities	Poverty Rate
<i>Van Buren Township (48111)</i>	10.1%
<i>Dearborn Southwest (48124)</i>	10.7%
<i>Dearborn Heights South (48125)</i>	19.0%
<i>Dearborn Heights North (48127)</i>	20.8%
<i>Dearborn West (48128)</i>	14.7%
<i>Garden City (48135)</i>	10.9%

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.

<i>Inkster (48141)</i>	36.0%
<i>Huron Township (48164)</i>	2.5%
<i>Romulus (48174)</i>	12.4%
<i>Taylor (48180)</i>	15.0%
<i>Wayne (48184)</i>	19.3%
<i>Westland South (48186)</i>	13.4%
<i>Canton South (48188)</i>	5.8%

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:

Affected Community: Van Buren Township - 48111

Total Affected Community Population: 40,900

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	28689	70%
<i>Black or African American</i>	9271	22.6%
<i>American Indian or Alaska Native</i>	30	0.07%
<i>Asian</i>	657	0.016%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	90	0.002%
<i>Two or More races</i>	2163	5.3%
<i>Hispanic or Latino</i>	1291	3.2%

Affected Community: Dearborn Southwest - 48214

Total Affected Community Population: 28,054

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	25153	89.6%
<i>Black or African American</i>	1008	3.6%
<i>American Indian or Alaska Native</i>	32	0.12%
<i>Asian</i>	431	1.5%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%

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

<i>Some Other Race Alone</i>	214	0.76%
<i>Two or More races</i>	1136	4.0%
<i>Hispanic or Latino</i>	1266	4.5%

Affected Community: Dearborn Heights South - 48125

Total Affected Community Population: 19,860

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	16946	85.3%
<i>Black or African American</i>	1687	8.5%
<i>American Indian or Alaska Native</i>	128	0.64%
<i>Asian</i>	135	0.68%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	434	2.2%
<i>Two or More races</i>	530	2.6%
<i>Hispanic or Latino</i>	1510	7.6%

Affected Community: Dearborn Heights North - 48127

Total Affected Community Population: 35,099

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	30101	85.7%
<i>Black or African American</i>	2791	7.95%
<i>American Indian or Alaska Native</i>	12	0.03%
<i>Asian</i>	843	2.4%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	291	0.8%
<i>Two or More races</i>	1061	3.0%
<i>Hispanic or Latino</i>	1296	3.7%

Affected Community: Dearborn West - 48128

Total Affected Community Population: 10,813

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	10377	95.9%
<i>Black or African American</i>	166	1.5%
<i>American Indian or Alaska Native</i>	0	0%
<i>Asian</i>	97	0.89%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	41	0.38%

<i>Two or More races</i>	132	1.2%
<i>Hispanic or Latino</i>	529	4.9%

Affected Community: Garden City - 48135
Total Affected Community Population: 26,476

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	23986	90.5%
<i>Black or African American</i>	884	3.3%
<i>American Indian or Alaska Native</i>	14	0.05%
<i>Asian</i>	396	1.49%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	71	0.27%
<i>Two or More races</i>	1125	4.2%
<i>Hispanic or Latino</i>	981	3.7%

Affected Community: Inkster - 48141
Total Affected Community Population: 24,199

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	4398	18.2%
<i>Black or African American</i>	17871	73.8%
<i>American Indian or Alaska Native</i>	256	1.0%
<i>Asian</i>	359	1.5%
<i>Native Hawaiian or Other Pacific Islander</i>	3	0.01%
<i>Some Other Race Alone</i>	189	0.78%
<i>Two or More races</i>	1123	4.6%
<i>Hispanic or Latino</i>	862	3.5%

Affected Community: Huron Township - 48164
Total Affected Community Population: 8,803

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	8289	94.2%
<i>Black or African American</i>	173	1.9%
<i>American Indian or Alaska Native</i>	27	.3%
<i>Asian</i>	69	0.78%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	17	.19%
<i>Two or More races</i>	228	2.6%

<i>Hispanic or Latino</i>	125	1.4%
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Affected Community: Romulus - 48174
Total Affected Community Population: 30,623

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	18450	60.2%
<i>Black or African American</i>	10116	33%
<i>American Indian or Alaska Native</i>	26	0.08%
<i>Asian</i>	744	2.4%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	312	1.0%
<i>Two or More races</i>	975	3.2%
<i>Hispanic or Latino</i>	1019	3.3%

Affected Community: Taylor - 48180
Total Affected Community Population: 60,333

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	44991	74.5%
<i>Black or African American</i>	11237	18.6%
<i>American Indian or Alaska Native</i>	282	0.5%
<i>Asian</i>	919	1.5%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	993	1.6%
<i>Two or More races</i>	1911	3.2%
<i>Hispanic or Latino</i>	3622	6.0%

Affected Community: Wayne - 48184
Total Affected Community Population: 16,811

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	11984	71.3%
<i>Black or African American</i>	3597	21.3%
<i>American Indian or Alaska Native</i>	139	0.82%
<i>Asian</i>	76	0.45%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0%
<i>Some Other Race Alone</i>	130	0.77%
<i>Two or More races</i>	885	5.3%
<i>Hispanic or Latino</i>	585	3.5%

Affected Community: Westland South - 48186
Total Affected Community Population: 34,610

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	24190	69.9%
<i>Black or African American</i>	7101	20.5%
<i>American Indian or Alaska Native</i>	306	0.88%
<i>Asian</i>	792	2.3%
<i>Native Hawaiian or Other Pacific Islander</i>	7	.02%
<i>Some Other Race Alone</i>	438	1.2 %
<i>Two or More races</i>	1776	5.1%
<i>Hispanic or Latino</i>	1939	5.6%

Affected Community: Canton South - 48188
Total Affected Community Population: 42,836

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	26976	62.9%
<i>Black or African American</i>	4198	9.8%
<i>American Indian or Alaska Native</i>	195	0.45%
<i>Asian</i>	9556	22.3%
<i>Native Hawaiian or Other Pacific Islander</i>	9	0.02%
<i>Some Other Race Alone</i>	48	0.11%
<i>Two or More races</i>	1854	4.3%
<i>Hispanic or Latino</i>	1250	2.9%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that Wayne County Airport Authority 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 *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 our community is Language other than English spoken at Home in Detroit, Michigan is 10% according to the 2021 American Community Survey 1-Year Estimates. Please refer to the end of this document to find data for all languages in our community.

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.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>Arabic</i>	61421	+/-9539
<i>Spanish</i>	45690	+/-7442
<i>Chinese (including Mandarin & Cantonese)</i>	17165	+/-4409
<i>Other Indo-European languages (incl. Albanian)</i>	14255	+/-5352
<i>Bengali</i>	13057	+/-4363
<i>Amhari, Somali, other Afro-Asiatic languages</i>	9097	+/-3307
<i>Korean</i>	7588	+/-2884
<i>Serbo-Croatian</i>	6660	+/-2206
<i>Japanese</i>	5700	+/-2333
<i>Ukrainian and other Slavic languages</i>	5645	+/-2523
<i>Polish</i>	3859	+/-1861
<i>Russian</i>	3611	+/-1865
<i>Vietnamese</i>	3211	+/-2182
<i>Urdu</i>	2989	+/-1934
<i>French (including Cajun)</i>	2973	+/-2210
<i>Italian</i>	2966	+/-1652
<i>Hindi</i>	2963	+/-1956
<i>Tagalog (including Filipino)</i>	2416	+/-1636
<i>Punjabi</i>	1834	+/-1060
<i>German</i>	1579	+/-1055
<i>Yoruba, Twi, Igbo, and other West African langs.</i>	1536	+/-1637
<i>Gujarati</i>	1526	+/-1202
<i>Portuguese</i>	1431	+/-1369
<i>Malayalam, Kannada, and other Dravidian langs.</i>	1280	+/-974
<i>Telugu</i>	1250	+/-965
<i>Other languages of Asia</i>	1204	+/-1240
<i>Hmong</i>	1187	+/-1029
<i>Nepali, Maranthi, other Indic languages</i>	1104	+/-1075
<i>Persian</i>	1027	+/-1199

See [Table B16001: Language Spoken at Home by Ability to Speak English](#) at end of plan for reference.

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)
<i>Arabic</i>				X
<i>Spanish</i>				X
<i>Chinese (including Mandarin &</i>				X

<i>Cantonese)</i>				
<i>Other Indo-European Languages including Albanian</i>				X
<i>Bengali</i>				X
<i>Amharic, Somali, other Afro-Asian</i>				X
<i>Korean</i>				X
<i>Serbo-Croatian</i>				X
<i>Japanese</i>				X
<i>Ukrainian & other Slavic languages</i>				X
<i>Polish</i>				X
<i>Russian</i>				X
<i>Vietnamese</i>				X
<i>Urdu</i>				X
<i>French (including Cajun)</i>				X
<i>Italian</i>				X
<i>Hindi</i>				X
<i>Tagalog</i>				X
<i>Punjabi</i>				X
<i>German</i>				X
<i>West African languages including Yoruba, Twi, Igbo</i>			X	
<i>Gujarati</i>			X	
<i>Portuguese</i>			X	
<i>Malayalam, Kannada, other Dravidian languages</i>			X	
<i>Telugu</i>			X	
<i>Other languages of Asia</i>			X	
<i>Hmong</i>			X	
<i>Nepali, Marathi, other Indic languages</i>			X	
<i>Persian</i>			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

<i>Hungarian</i>
<i>African languages (unspecified)</i>

This information is updated annually⁹ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	https://data.census.gov/table?q=B16001&tid=ACSDT5Y2020.B16001

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

- *WCAA’s Department of Financial Planning & Analysis conducts surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey will be revised to include a voluntary request for demographic information.*
- *Participants at small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.*

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 hire.*
- *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through a form provided, that will in the future be an online survey.*

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.

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 Wayne County Airport Authority activity at Detroit Metropolitan Wayne County Airport 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

In consideration of Potential or Known Community Impacts, it is worth noting that Detroit Metropolitan Wayne County Airport (DTW) is one of the world’s leading air transportation hubs. Prior to the COVID Pandemic, DTW facilitated more than 1,100 flights per day to and from four continents, serving 36.7 million passengers per year. DTW is operated by the Wayne County Airport Authority (WCAA), which also operates nearby Willow Run Airport (YIP), an important corporate, cargo and general aviation facility. WCAA drives economic activity. Its airports are not only responsible for creating jobs, but also sustaining more than 86,000 jobs throughout the state and \$10.2 billion dollars in annual economic impact prior to the Pandemic. It is also worth noting that the current five-year Capital Improvement Project (2023-27) at DTW is estimated at \$1.15 billion dollars of construction, providing high-paying construction jobs to residents in Southeast Michigan and beyond. In addition, the WCAA has a robust Small Business Enterprise (SBE) program for non-Federally Funded programs and projects. In 2022 this program provided \$47.5 million to WCAA Certified SBEs. And of the 15,411 currently credentialed individuals at DTW, 3,826 or 24.8% are from the “Affected Communities” identified in Section 6, while 27.7% of WCAA employees are from those same “Affected Communities”.

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
<i>McNamara Terminal and Air Traffic Control Tower</i>	<i>None</i>
<i>Evans Terminal</i>	<i>None</i>
<i>Airport Public Safety HQ</i>	<i>None</i>
<i>Airport Rescue & Fire Fighting (ARFF) Facilities</i>	<i>None</i>
<i>WCAA Maintenance Facility Campus</i>	<i>None</i>
<i>Airport Power Plants and Support Facilities</i>	<i>None</i>
<i>McNamara Terminal Parking Structure</i>	<i>None</i>

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.

<i>Airport Public Safety Training Facilities</i>	<i>None</i>
<i>Blue Deck Parking Structure</i>	<i>None</i>
<i>Various Landside WCAA Support Facilities</i>	<i>None</i>
<i>Airport Storm Water Ponds and Drainage Systems</i>	<i>None</i>
<i>ARFF Training Facility and Burn Pit</i>	<i>During training operations, the facility utilizes a propane burning aircraft simulator to conduct mandatory ARFF training. That operation produces smoke. Training operations are conducted at the simulator from April to October every year. The Airport Fire Dept. has three platoons, each platoon uses the simulator approximately 18 - 25 times per month, and actual burn times are short term. In a typical season there are also an additional 5 - 8 other airport or community Fire Depts. that use the facility.</i>
<i>Existing Airfield Aircraft Movement and non-Movement pavement and supporting Facilities, including Ground Run-up Enclosure, FAA Radar Stations and Lighting equipment</i>	<i>Under previous airport expansion projects, these facilities were approved through the NEPA process. Further, under previously approved Noise programs the affected communities received improvement and/or land was purchased within the identified noise impacted areas.</i>
<i>Existing Airport Roadways, Tunnels, Bridges, Parking Lots and miscellaneous Landside pavement</i>	<i>None</i>
<i>Various Tenant Facilities and Support Facilities including Airline Hangars, Fixed Base Operations, Rental Car Facilities and various Tenant Support Facilities</i>	<i>None</i>
<i>Existing Facilities Under Construction</i>	
<i>McNamara Terminal Apron Reconstruction - Phase 2</i>	<i>Airfield Non-Movement Area Pavement reconstruction project that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Reconstruction of TWY Y - Phase II (South)</i>	<i>Airfield Movement Area Pavement reconstruction project that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Checkpoint 34F Improvements and Eureka Staging</i>	<i>Enabling project to support Airfield Pavement reconstruction projects. Minimal impacts to affected communities during construction due</i>

	<i>to increased construction traffic.</i>
<i>Big Blue Deck Concrete Floor Repairs, Guardrails and Waterproofing</i>	<i>Parking Deck Maintenance Project - None</i>
<i>McNamara Parking Deck Elastomeric Coating</i>	<i>Parking Deck Maintenance Project - None</i>
<i>Bridge 13371 Preventative Maintenance</i>	<i>Roadway Bridge Maintenance Project - None</i>
<i>DTW Landscape Restoration</i>	<i>None</i>
<i>Medium Voltage Transmission Line - Phase 1</i>	<i>Utility Infrastructure Improvements - None</i>
<i>Medium Voltage Conversion – Direct Feed from Powerhouse (BBD & Wick Rd.)</i>	<i>Utility Infrastructure Improvements - None</i>
<i>Security System Network Upgrade Node 2 to Building 610 Fiber Infrastructure</i>	<i>Utility Infrastructure Improvements - None</i>
<i>ARFF 100 Female Facilities Improvements</i>	<i>Internal Building Improvements - None</i>
<i>Building 425 SkyWest Hangar Roof Replacement</i>	<i>Tenant Facility Roof Replacement - None</i>
<i>McNamara Terminal Jet Bridge Replacement – Phase 1</i>	<i>Replacement of existing Terminal Jet Bridges - None</i>
<i>McNamara Terminal Passenger Restroom Upgrades</i>	<i>Internal Building Improvements - None</i>
<i>McNamara Terminal Baggage Claim Carousel Replacement</i>	<i>Internal Building Improvements - None</i>
<i>McNamara Terminal Pre-Conditioned Air & Ground Power Unit Replacement – Pkgs. A & B</i>	<i>Replacement of existing aircraft gate equipment - None</i>
<i>Primary Pump & Switchgear Replacements (Pump Stations #1 & 2)</i>	<i>Storm Water control equipment replacement, improvements and repair - None</i>
<i>New Cargo Facility</i>	<i>New Tenant Cargo Distribution Facility - Minimal impacts to affected communities during construction due to increased construction traffic. Storm water system projects below will mitigate potential impacts to affected communities.</i>
<i>Pond 6 Raise and Improvements</i>	<i>Project to increase the capacity of existing airport stormwater detention system for the New Cargo Facility.</i>
<i>New Cargo Facility Glycol Force Main</i>	<i>Project to direct storm water impacted with glycol used to deice aircraft for the New Cargo Facility. Force Main will move storm water from aircraft apron during winter aircraft deicing operations to Pond 3W (used for detention of glycol impacted storm water before release to sanitary system and regional treatment facility). Minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Tenant Aircraft Hangar Expansion</i>	<i>Addition to existing Tenant Hangar to allow for larger aircraft - Minimal impacts to affected communities during construction due to increased construction traffic.</i>

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

Note: Anticipated Construction seasons are based upon the WCAA Capital Improvement Program and subject to change based upon funding, coordination with other Airport projects and changes in project priorities.

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>McNamara Terminal Apron Reconstruction - Phase 3</i>	<i>2025 Construction - Airfield Non-Movement Area Pavement reconstruction project that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Reconstruction of TWY Z South Relocation and Improvements</i>	<i>2026 Construction - Airfield Movement Area Pavement reconstruction project that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>McNamara Terminal / Westin Hotel Apron Improvements</i>	<i>2024 or 2025 Construction - Airfield Non-Movement Area Pavement reconstruction project that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Miscellaneous Airfield Pavement Repairs</i>	<i>Annual Airfield Movement and Non-Movement Area Pavement repair projects that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Dingell Drive Tunnel & Roadway Improvements - Phase 1</i>	<i>2023-24 Construction - Airport Tunnel & Roadway Improvement Project. Impacts to affected communities during construction due to increased construction traffic.</i>
<i>Dingell Drive Tunnel Exterior Drainage Improvements - Phase 2</i>	<i>2025-26 Construction - Airport Tunnel 'Exterior' Improvement Project, including Airfield impacted pavement and stormwater system replacement. Impacts to affected communities during construction due to increased construction traffic.</i>
<i>RWY 9R/27L Improvements</i>	<i>2024 Construction - Airfield Movement Area Pavement interim improvement project to address needed repairs until RWY can be fully reconstructed. Minimal impacts to affected communities during construction due to</i>

	<i>increased construction traffic.</i>
<i>Big Blue Deck Over-height Vehicle Parking Lot Reconstruction</i>	<i>2024 Construction - Parking lot pavement replacement that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Frank & Poet Drain Culvert Improvements</i>	<i>2024 Construction - Project to replace/improve security screens at stormwater culverts. Improvements to make debris removal process safer and more efficient - None</i>
<i>Parking Deck Preventative Maintenance</i>	<i>Regular maintenance and repairs with the McNamara Terminal and Blue Deck Parking Structures - None</i>
<i>Medium Voltage Upgrades - Phase 2 Generator & Powerhouse Switchgear</i>	<i>2024 Construction - Utility Infrastructure Improvements - None</i>
<i>Medium Voltage Upgrades -North Campus Electrical Distribution – Loop 3</i>	<i>2024-25 Construction - Utility Infrastructure Improvements - None</i>
<i>Evans Terminal Pre-Conditioned Air & Ground Power Unit Replacement</i>	<i>2024 Construction - Replacement of existing aircraft gate equipment - None</i>
<i>Security System Network Upgrades, Completion of Phase 2, Node 1 to Checkpoint 1 Fiber Connection</i>	<i>2024 Construction - Utility Infrastructure Improvements - None</i>
<i>Evans Terminal Support Beam Repairs</i>	<i>2024 Construction - Repairs to existing non-primary structural members - None</i>
<i>McNamara Terminal, Evans Terminal and Hotel Roof Life Cycle Enhancements</i>	<i>2023-24 Construction - Interim repairs/replacement of membrane roofing systems - None</i>
<i>McNamara Terminal Center for Disease Control Office Relocation</i>	<i>2023-24 Construction - Internal Office build-out within the McNamara Terminal - None</i>
<i>Maintenance Ice Controls Storage Building</i>	<i>2024 Construction - New facility to be located on the Airfield to store pavement deicing materials and provide employee support services that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>West Maintenance Complex / Maintenance Snow Removal Equipment Storage Building & WCAA Equipment Cold Storage Building</i>	<i>2024-26 Construction - New facilities & improvements to existing facilities located at the West Maintenance Complex of DTW that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Building 348 Renovation / Site Improvements to support the Rental Car Consolidation Project</i>	<i>2024-26 Construction - Improvements to vacant former Executive Terminal building that will be repurposed as rental car facility and have minimal impacts to affected communities during construction due to increased construction traffic.</i>

<i>DTW Roof Replacement Plan</i>	<i>2023-26 Construction - Roof repairs/replacement of various WCAA and Tenant buildings located at DTW as part of the asset management plan - None</i>
<i>McNamara Building Baggage Screening Equipment Replacement</i>	<i>2024-25 Construction - Replacement of TSA screening equipment within the McNamara Terminal baggage handling system - None</i>
<i>Evans Terminal Refresh - Phase 1 and 2</i>	<i>2024-26 Construction - Improvements and alterations to the Evans Terminal Ticket Lobby, Baggage Claim and curbside areas that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>McNamara Terminal Jet Bridge Replacement – Phase 2</i>	<i>Replacement of existing Terminal Jet Bridges - None</i>
<i>Rental Car Brand Consolidation Project</i>	<i>2024-26 Construction - Facility and infrastructure replacement/alterations on the 68 Acre DTW Rental Car site that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Pump Station Upgrades – Phase 2 Pump Stations #3, 9, 11, 12 & 13</i>	<i>Storm Water control equipment replacement, improvements, and repair - None</i>
<i>Evans Terminal - Spirit Airlines Self-Bag Drop and Ticket Counter Updates</i>	<i>2023 Construction - Airline improvements to Ticket Counter and bag checking operations - None</i>
<i>New Tenant Fueling Station / Car Wash / Convenience Store</i>	<i>2023-24 Construction - New Tenant concessions development at the corner of Middlebelt Rd. and Lucas Drive at the NE corner of DTW that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>McNamara Terminal - Delta Air Lines Inflight Lounge Alterations</i>	<i>2023 Construction - Airport employee lounge improvements/alteration within the Terminal - None</i>
<i>Alterations to Former Hangar to Support Temporary Cargo Facility</i>	<i>2023 Construction - Tenant alterations to support belly cargo operations during construction of new facility - None</i>
<i>South Power Plant Site Generators</i>	<i>2025 or 26 Construction - Improvements to existing South Campus site generators and addition of new generators - None</i>
<i>Rogell Drive to Dingell Drive Connector</i>	<i>2026 or 27 Construction - Connector Ramp between North and South roadways at DTW that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>

<i>New Tenant Cargo Handling Facility</i>	<i>2024-25 Construction - New Tenant cargo handling facility to be built on the east side of the airport that will have minimal impacts to affected communities during construction due to increased construction traffic.</i>
<i>Various McNamara Terminal Improvement/Alterations projects</i>	<i>2023-27 Construction - Various interior improvement projects for restrooms, finish repair/replacement, security and infrastructure improvements - None</i>
<i>Various Evans & McNamara Terminal Concessions program replacements and/or refresh projects</i>	<i>2023-27 Construction - Various interior tenant food/beverage and retail replacements and fit-outs - None</i>

We have analyzed the above existing facilities and facility construction projects for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts:

Facilities or Construction Projects with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
<i>None.</i>		

Justifications:

Facilities or Construction Projects	Justification
<i>None.</i>	<i>N/A</i>

8. Limited English Proficiency (LEP)

Executive Order 13166

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

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

Language

<i>Arabic</i>
<i>Spanish</i>
<i>Chinese (incl Mandarin, Cantonese)</i>
<i>Other Indo-European Languages</i>
<i>Bengali</i>
<i>Afro-Asiatic Languages incl. Amharic, Somali</i>
<i>Korean</i>
<i>Serbo-Croatian</i>
<i>Japanese</i>
<i>Ukrainian and other Slavic languages</i>
<i>Polish</i>
<i>Russian</i>
<i>Vietnamese</i>
<i>Urdu</i>
<i>French</i>
<i>Italian</i>
<i>Hindi</i>
<i>Tagalog</i>
<i>Punjabi</i>
<i>German</i>
<i>West African languages incl. Yoruba, Twi, Igbo</i>
<i>Gujarati</i>
<i>Portuguese</i>
<i>Malayalam, Kannada, other Dravidian languages</i>
<i>Telugu</i>
<i>Other languages of Asia</i>
<i>Hmong</i>
<i>Nepali, Marathi, other Indic languages</i>
<i>Persian</i>

Wayne County Airport Authority also collects data for languages spoken by airport guests.¹¹ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Interpretation requests at airport desks</i>	<i>Report from Bromberg</i>
<i>Assumption from flight origin / destination</i>	<i>N/A</i>

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

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.

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 the Wayne County Airport Authority of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

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
<i>Bromberg</i>	<i>All above languages</i>

Information regarding translation services can be obtained at: None

Location for Translation Assistance	Languages
<i>Airport website request form</i>	<i>All above languages</i>
<i>Airport website translate view</i>	<i>Spanish, Arabic, Korean, French, German, Chinese, Japanese</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Bromberg</i>	<i>All above languages</i>

Information regarding interpretation services can be obtained at: Airport Ambassador Stations in pre-secure areas that are all provided with “I Speak...” cards.

Location for Interpretation Assistance	Languages
<i>Airport Ambassador information desks</i>	<i>All above languages, using Bromberg</i>

Description of Interpretation Assistance Processes

The airport contracts with Bromberg to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff use “I Speak...” cards to identify the language spoken by the airport guest. Staff contacts Bromberg and “parks” the request in the queue for the appropriate language. Bromberg operators will coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is then logged by Bromberg. This log is kept for one year.

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 Southeast Michigan Area Rapid Transit (SMART) and Ann Arbor Area Transportation Authority (AAATA) and their service providers 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
Detroit, Romulus, Wayne, Westland, Inkster, Dearborn Heights, Taylor	SMART Fixed-route buses	Existing
Same cities listed above – providing connections within ¾ mile of fixed routes	SMART Paratransit vans	Planned
Same cities listed above	SMART Flex Service	Under Study

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: *Every competitive solicitation posted to Munis is advertised in the following locations:*

www.metroairport.com

Michigan Intergovernmental Trade Network

Airport Consultant Council (ACC)

Airport Ground Transportation Association (AGTA)

Airport Minority Advisory Council (AMAC)

Airports Council International (ACI)

FAA DBE

Airport Business Opportunity	Minority Business Outreach Methods
<i>Overhead Crane & Fall Protection, Inspection, Service and Certification</i>	<i>See Above for All</i>
<i>Dingell Drive Tunnels and Roadway Rehabilitation Project</i>	
<i>Hazardous & Non-Hazardous Material Remediation and Removal Services</i>	
<i>Evans Terminal Preconditioned Air and Ground Power Unit Replacement DTW</i>	
<i>External Audit Services</i>	
<i>Advanced Notice - McNamara Terminal Jet Bridge Replacement Phase 2</i>	
<i>Medicare Advantage with Prescription Drug (MAPD) Benefits</i>	
<i>Pump System Inspection, Repair, Replacement And Related Services</i>	
<i>RE-QUOTE Granite and Quartz Countertops</i>	
<i>RE-QUOTE Miscellaneous Stock Steel</i>	
<i>WCAA Concessions Outreach Materials</i>	
<i>OEM Ford Parts and Service</i>	
<i>Website Development and Maintenance Services</i>	
<i>Radiator Sales, Repairs, and Fabrication</i>	
<i>Hydraulic Pump Motor Repair and Services</i>	
<i>Display and Camera Installation Services</i>	
<i>OEM Ingersoll Rand Parts</i>	
<i>Miscellaneous Welding Supplies and Equipment</i>	
<i>Sealcoat Material & Miscellaneous Parts</i>	
<i>Landside Snow Removal Services</i>	

Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and documentation for specific bid decisions is kept with Business Diversity Office.

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, Wayne County Airport Authority 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 matters¹⁴
3. Alleged misconduct by the Wayne County Airport Authority including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the Wayne County Airport Authority including airport employees, contractors, concessionaires, lessees, or tenants.

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.

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.

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 Wayne County Airport Authority.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 Legal Department as well as the CEO, COO and the office named in the complaint.

Complaints must be filed within 60 (sixty) days of the discriminatory event, must be in writing, and must be delivered to:

Darrell J. Dinges, ADA / Title VI Coordinator & Senior Project Manager
11050 Rogell Drive, Building 602, Detroit, MI 48242-5004
734-247-7370
accessibility@wcaa.us

If a complaint is initially made by phone, it must be supplemented with a written complaint before 60 (sixty) 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 three (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 use the FAA Civil Rights Connect System. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

¹⁵

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 Wayne County Airport Authority 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 (sixty) 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 negotiation.

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 Wayne County Airport Authority's conclusion regarding whether unlawful discrimination occurred and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights. The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

- The complainant may appeal in writing to the Wayne County Airport Authority's Chief Executive Officer.
- The written appeal must be received within 30 (thirty) 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 Chief Executive Officer 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 Wayne County Airport Authority will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. Wayne County Airport Authority employees, contractors, and tenants will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

For information on filing a complaint with DOT/FAA, please contact the Wayne County Airport Authority's 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, at www.metroairport.com/at-dtw/getting-around/accessibility-additional-assistance

2

14. Population / Language Data

See Appendices A1 & A2.

15. Completed Unlawful Discrimination Poster

See Appendix B.