

Greenville-Spartanburg Airport District Title VI Plan

1. Title VI Policy Statement¹

Greenville-Spartanburg Airport District (The District) who operates the Greenville-Spartanburg International Airport (**GSP**), 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 District further assures every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs are federally funded or not. The District 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 District will take action to involve them and the general public in the decision-making process.

The District makes every effort to require nondiscrimination assurances, as prescribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Every effort is made for assurances to be included in any related lease, contract, or franchise agreement between the District and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

Kelly Dawsey, Vice President-Chief Human Resources Officer, available at 864.848.6271 and kdawsey@gspairport.com, is responsible for overseeing the District’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.

David
Edwards

Digitally signed by David
Edwards
Date: 2023.12.28
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Signature

David N. Edwards, Jr.
President/CEO

12-31-2023

Effective Date

09-30-2026

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 President/CEO of the Greenville-Spartanburg Airport District (The District) has reviewed and approved this Title VI Plan for Greenville-Spartanburg International Airport (GSP). 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 President/CEO or the Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the President/CEO and resubmittal to the FAA.

In addition to the Coordinator and the District leadership, the following people also assist with our Title VI program requirements.

Staff Supporting Title VI Program	Airport Sponsor Program / Office
<i>Kendall Griswold, Mike Tolleson</i>	<i>Human Resources Department</i>
<i>Tom Tyra, Tiffany Cherry, Courtney Myers, Kim Davis, Jonathan Sykes</i>	<i>Communications Department</i>
<i>Jeff Clifton, Katie Eleam, Shaheer Hakim</i>	<i>Design & Construction Department</i>
<i>Resource to be determined</i>	<i>Procurement Department</i>

The District has the following airport program sub-recipients:

Sub-Recipients
<i>None</i>

The District has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
<i>FAA AIP</i>	<i>#3-45-0028-053-2017</i>	<i>\$4,138,888</i>
<i>EDA</i>	<i>#04-79-07736</i>	<i>\$5,232,611</i>

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

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

[If applicable: “In addition, The District’s sub-recipients have the following pending applications for Federal financial assistance (either directly from the FAA, or passed through the State DOT):

Federal Source	Grant Number	Amount
	<i>None</i>	

3. Grant and Procurement Assurances

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

The District 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. **The District** will make every effort to include in all contracts, leases, deeds, licenses, permits, and other similar instruments, the contractual requirements, and clauses, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/. The District will make every effort to include special clauses that are required for certain types of contracts, such as land acquisition.
- b. **The District** will make every effort for Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

Description of Oversight Methods for Subcontracts

Every effort will be made for subcontracts to include Title VI language provided by the District, and audits will be conducted randomly on subcontracts for not less than 10% of contractors each year to ensure compliance.

4. Title VI Coordinator Responsibilities

The Coordinator is responsible for ensuring that they and other staff supporting Title VI compliance are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications.

See the Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that the District is in compliance with nondiscrimination requirements of Title VI and reports to the District 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'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)). Examples of data collection methods may 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 District. 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 District will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,² and maintained. The poster template is available at

https://www.faa.gov/about/office_org/headquarters_offices/act/com_civ_support/non_disc_pr/ and a completed copy is attached. See Section 14 Appendix.

The District will display the above Title VI policy statement at its staff offices.

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

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

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
<i>Terminal</i>	<i>5</i>	<i>1</i>	<i>2</i>
<i>Rent-a-Car</i>	<i>5</i>		
<i>FBO</i>	<i>1</i>		

Source: Airport staff

Outreach to Affected Communities

The Administrative District Office will make efforts to include impacted communities in the distribution of notices or public meetings. Announcements may be made using a combination of social media, general circulation newspapers, community newspapers, airport website and/or email broadcast. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

To ensure that the community is effectively informed of and able to participate in public hearings, the Administrative District Office may include public notices translated into appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include directions 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 District will be able to identify, understand, and engage with communities. In doing so, the District needs to know about communities eligible to be served, actually or potentially affected, benefited, or burdened by its airport program.

Affected Communities³	Population
<i>Greenville County</i>	515,699
<i>Spartanburg County</i>	322,193

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

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

We have identified the following facts about the Affected Communities:

Low Income Communities⁴.

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” **The District** is collecting information about affected and potentially affected low-income communities. According to the *U.S. Census Report, S1701: Poverty Status in the Past 12 Months*, the overall poverty level for the state of South Carolina is approximately 14%. The poverty rate for the rest of the United States is 12.5%. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
<i>Greenville County</i>	10.9%
<i>Spartanburg County</i>	14.4 %

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

Racial and Ethnic Communities.

Demographic data for race, color, and national origin was evaluated to identify racial and ethnic communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows⁵:

Affected Community: *Greenville County*
Total Affected Community Population: 515,699

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>American Indian and Alaska Native alone</i>	2,134	0%
<i>Asian alone</i>	12,953	3%
<i>Black or African American alone</i>	88,642	17%
<i>Hispanic or Latino origin (of any race)</i>	51,299	10%

³ “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.

⁴ 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.

⁵ Recommend using demographic groups from the U.S. Census.

<i>Native Hawaiian and Other Pacific Islander alone</i>	276	0%
<i>Some other race alone</i>	20,137	4%
<i>Two or more races</i>	32,216	6%
<i>White alone</i>	359,341	70%

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

Affected Community: Spartanburg County
Total Affected Community Population: 322,193

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
American Indian and Alaska Native alone	645	0%
Asian alone	7,342	2%
Black or African American alone	64,396	20%
Hispanic or Latino origin (of any race)	24,718	8%
Native Hawaiian and Other Pacific Islander alone	37	0%
Some other race alone	7,432	2%
Two or more races	18,315	6%
White alone	224,026	70%

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

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that the District communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁶ that are spoken in LEP households in the Affected Communities. The data source is the *American Community Survey*.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁷ The safe harbor for our community is 1000.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>Spanish – Greenville County</i>	16,321	±921
<i>Spanish – Spartanburg County</i>	7,072	±619

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

⁶ 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.

⁷ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

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

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
<i>Spanish</i>	X			

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

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>None</i>

This information is updated annually⁸ through checking the following resources:

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	<i>https://data.census.gov/table/ACSDT5Y2015.B16001?q=B16001&g=050XX00US45045,45083</i>

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 Service Office conducts a survey of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. Annually, this survey will include a voluntary request for demographic information.*
- *Participants at small business workshops, pre-bid meetings, and other public meetings are periodically asked to complete an anonymous survey that includes demographic information.*
- *Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information.*

Staff and Advisory Board Diversity.

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

⁸ 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.

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 system.*
- *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously provide demographic information.*

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 **District** 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.⁹

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>Existing Terminal and Airfield Facilities Area</i>	<i>Spartanburg & Greenville County</i>
<i>FBO</i>	<i>Spartanburg & Greenville County</i>
<i>Cargo Facility</i>	<i>Spartanburg & Greenville County</i>

Source: Airport staff

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

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>Runway Guard Lights</i>	<i>None</i>
<i>Cargo Apron</i>	<i>None</i>
<i>GA Expansion</i>	<i>None</i>
<i>Parking Garage C & CONRAC Facility</i>	<i>None</i>
<i>Facilities Area Expansion</i>	<i>None</i>
<i>TSA 5th Checkpoint Lane</i>	<i>None</i>

⁹ 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>Utility Improvements</i>	<i>None</i>
<i>GSP Roadway Improvements</i>	<i>None</i>
<i>Passenger Boarding Bridge Construction</i>	<i>None</i>
<i>Terminal Sustainability & Energy Efficiency Project</i>	<i>None</i>
<i>Runway Rehabilitation</i>	<i>None</i>
<i>Microgrid Project</i>	<i>None</i>
<i>Parking Garage A & B Rehabilitation Project</i>	<i>None</i>
<i>Terminal Enhancement Projects</i>	<i>None</i>

Source: Airport staff

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

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

Source: Airport staff

Justifications:

Facilities or Construction Projects	Justification
<i>None</i>	

Source: Airport staff

8. Limited English Proficiency (LEP)
Executive Order 13166

In creating a Language Assistance Plan, **the District** 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
<i>Spanish</i>

The District also collects data for languages spoken by airport guests.¹⁰ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Airport language line usage data</i>	<i>www.language-line.com</i>
<i>Text Line</i>	<i>www.kipsu.com</i>
<i>Airport Website</i>	<i>gspairport.com</i>

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

Language
<i>None</i>

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform the leadership and staff of the District 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>Ivannovation Language Management</i>	<i>All above languages</i>

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>The District website</i>	<i>All above languages</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Language Line, Inc.</i>	<i>All above languages</i>

¹⁰ 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.

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>At Airport Information Center</i>	<i>All above languages</i>
<i>By texting Airport Information Center</i>	<i>All above languages</i>
<i>By calling Airport Information Center</i>	<i>All above languages</i>

Description of Interpretation Assistance Processes

- *Customer will contact the Airport Information Center in person, by phone or by text with a question in a language other than English. From there, the Information Center Representative will respond to inquiry using a tablet with Google Translate software installed. If the inquiry is more detailed or the language cannot be determined, staff will contact Language Line for verbal assistance with customers. Text messages can be immediately translated in response to a customer inquiry.*
- *Airlines will also have resources available for their customers.*
- *The District website has been designed to be accessible for language, visually impaired, hearing impaired and other needs.*

9. Transportation

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

Greenlink and the Spartanburg Area Regional Transit currently do not provide service to the airport.

10. Minority Businesses

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

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

Airport Business Opportunity	Minority Business Outreach Methods
<i>Concessions</i>	<i>Networking sessions organized by the GSP International Airport and within the region with small and minority businesses such as the South Carolina Airports Coalition Outreach Event. Collaboration with local chambers of commerce, community groups, and local and state government agencies. Advertised via the airport website and an airport newsletter.</i>
<i>Construction Projects</i>	<i>Advertised via the airport website and an airport newsletter, Facilitation of interest meetings and networking sessions organized by the GSP Airport and other locations in the region such as the South Carolina Airports Coalition Outreach Event, Pre-bid meetings,</i>

	<i>Collaboration with local chambers and posting with minority and small business organizations.</i>
<i>Rental Car Goods & Services</i>	<i>Annual Rental Car ACDBE Outreach</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 the District administration area.

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 District public facilities
- All contracts 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 requirements¹¹
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹²

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, **The District** 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 matters¹³
3. Allege misconduct by the District, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concerning an airport facility or actions by the District, including airport employees, contractors, concessionaires, lessees, or tenants.

¹¹ 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.

¹² Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

¹³ 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 District. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the Human Resources Department and the President/CEO.

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

Kelly G. Dawsey, Vice President-Chief Human Resources Officer
2000 GSP Drive, Suite 1
Greer, SC 29651
Phone: 864.848.6271
kdawsey@gspairport.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 District Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

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

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 7 days.

Initial FAA Notification. A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof, to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will **upload the information into the FAA Civil Rights Connect System**. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

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

Cooperation with FAA. The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against the District, 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. Where applicable, 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 through mediation with the complainant and contractor/tenant/other persons involved in the dispute.

Forwarding Report and Response to Complainant. At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state the District'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 District's President/CEO.
- 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 President/CEO will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. **The District** 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 **Kelly G. Dawsey**.

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

Website, In-person, and Other Distribution Methods

Airport website, <https://gspairport.com>, Title VI page

14. Population / Language Data

B160001 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Label	Greenville County, South Carolina		Spartanburg County, South Carolina	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	443,754	±51	272,708	±41
Speak only English	394,271	±1,707	245,984	±1,386
Spanish or Spanish Creole:	34,133	±1,192	14,991	±972
Speak English "very well"	17,812	±1,137	7,919	±759
Speak English less than "very well"	16,321	±921	7,072	±619
French (incl. Patois, Cajun):	1,509	±307	607	±237
Speak English "very well"	1,158	±269	470	±183
Speak English less than "very well"	351	±158	137	±123
French Creole:	40	±34	84	±79
Speak English "very well"	30	±31	84	±79
Speak English less than "very well"	10	±19	0	±29
Italian:	179	±92	59	±43
Speak English "very well"	150	±80	43	±37
Speak English less than "very well"	29	±32	16	±21
Portuguese or Portuguese Creole:	315	±191	208	±156
Speak English "very well"	173	±88	168	±146
Speak English less than "very well"	142	±142	40	±31
German:	1,639	±310	1,003	±252
Speak English "very well"	1,395	±284	835	±217
Speak English less than "very well"	244	±133	168	±90
Yiddish:	15	±16	0	±29
Speak English "very well"	15	±16	0	±29
Speak English less than "very well"	0	±29	0	±29
Other West Germanic languages:	169	±115	30	±31
Speak English "very well"	169	±115	28	±31
Speak English less than "very well"	0	±29	2	±4

Scandinavian languages:	105	±82	35	±40
Speak English "very well"	101	±81	35	±40
Speak English less than "very well"	4	±7	0	±29
Greek:	322	±152	101	±70
Speak English "very well"	186	±82	59	±46
Speak English less than "very well"	136	±86	42	±33
Russian:	497	±199	1,722	±685
Speak English "very well"	348	±168	721	±479
Speak English less than "very well"	149	±75	1,001	±458
Polish:	290	±148	92	±56
Speak English "very well"	199	±104	22	±23
Speak English less than "very well"	91	±72	70	±51
Serbo-Croatian:	22	±21	98	±143
Speak English "very well"	22	±21	98	±143
Speak English less than "very well"	0	±29	0	±29
Other Slavic languages:	87	±79	1,719	±709
Speak English "very well"	85	±78	726	±349
Speak English less than "very well"	2	±5	993	±448
Armenian:	0	±29	0	±29
Speak English "very well"	0	±29	0	±29
Speak English less than "very well"	0	±29	0	±29
Persian:	120	±111	16	±25
Speak English "very well"	93	±104	16	±25
Speak English less than "very well"	27	±24	0	±29
Gujarati:	577	±278	454	±204
Speak English "very well"	304	±167	329	±202
Speak English less than "very well"	273	±207	125	±101
Hindi:	559	±215	86	±59
Speak English "very well"	438	±163	66	±57
Speak English less than "very well"	121	±89	20	±24
Urdu:	264	±164	120	±104
Speak English "very well"	163	±101	109	±94

Speak English less than "very well"	101	±128	11	±19
Other Indic languages:	288	±169	199	±196
Speak English "very well"	195	±155	112	±116
Speak English less than "very well"	93	±75	87	±89
Other Indo-European languages:	196	±90	353	±395
Speak English "very well"	183	±91	298	±338
Speak English less than "very well"	13	±15	55	±61
Chinese:	1,547	±443	468	±353
Speak English "very well"	695	±242	160	±152
Speak English less than "very well"	852	±307	308	±217
Japanese:	631	±265	72	±59
Speak English "very well"	212	±104	53	±53
Speak English less than "very well"	419	±232	19	±17
Korean:	800	±292	324	±202
Speak English "very well"	403	±185	141	±122
Speak English less than "very well"	397	±151	183	±106
Mon-Khmer, Cambodian:	187	±206	910	±501
Speak English "very well"	161	±202	583	±453
Speak English less than "very well"	26	±30	327	±190
Hmong:	60	±66	998	±387
Speak English "very well"	60	±66	723	±305
Speak English less than "very well"	0	±29	275	±140
Thai:	137	±126	62	±76
Speak English "very well"	117	±117	43	±52
Speak English less than "very well"	20	±33	19	±28
Laotian:	92	±108	577	±245
Speak English "very well"	88	±108	220	±117
Speak English less than "very well"	4	±8	357	±171
Vietnamese:	1,133	±371	333	±195
Speak English "very well"	401	±235	92	±71
Speak English less than "very well"	732	±262	241	±157
Other Asian languages:	1,007	±359	147	±107

Speak English "very well"	760	±258	134	±105
Speak English less than "very well"	247	±214	13	±20
Tagalog:	494	±164	319	±136
Speak English "very well"	435	±151	207	±105
Speak English less than "very well"	59	±48	112	±79
Other Pacific Island languages:	169	±85	15	±22
Speak English "very well"	116	±64	15	±22
Speak English less than "very well"	53	±53	0	±29
Navajo:	0	±29	0	±29
Speak English "very well"	0	±29	0	±29
Speak English less than "very well"	0	±29	0	±29
Other Native North American languages:	15	±25	12	±19
Speak English "very well"	15	±25	12	±19
Speak English less than "very well"	0	±29	0	±29
Hungarian:	82	±44	80	±95
Speak English "very well"	53	±35	50	±71
Speak English less than "very well"	29	±30	30	±35
Arabic:	1,045	±412	370	±297
Speak English "very well"	650	±295	248	±180
Speak English less than "very well"	395	±177	122	±133
Hebrew:	28	±40	30	±37
Speak English "very well"	28	±40	30	±37
Speak English less than "very well"	0	±29	0	±29
African languages:	637	±319	24	±27
Speak English "very well"	544	±292	24	±27
Speak English less than "very well"	93	±75	0	±29
Other and unspecified languages:	93	±58	6	±8
Speak English "very well"	83	±55	6	±8
Speak English less than "very well"	10	±16	0	±29

S1701 | Poverty Status in the Past 12 Months

	Greenville County, South Carolina					
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	515,699	±509	56,304	±3,112	10.9%	±0.6
AGE						
Under 18 years	118,909	±460	17,469	±1,686	14.7%	±1.4
Under 5 years	31,197	±261	5,631	±695	18.0%	±2.2
5 to 17 years	87,712	±316	11,838	±1,231	13.5%	±1.4
Related children of householder under 18 years	118,636	±522	17,247	±1,686	14.5%	±1.4
18 to 64 years	312,420	±220	31,477	±1,763	10.1%	±0.6
18 to 34 years	112,073	±253	14,478	±1,176	12.9%	±1.0
35 to 64 years	200,347	±189	16,999	±1,106	8.5%	±0.6
60 years and over	118,164	±1,229	10,720	±800	9.1%	±0.7
65 years and over	84,370	±125	7,358	±607	8.7%	±0.7
SEX						
Male	251,114	±527	23,735	±1,524	9.5%	±0.6
Female	264,585	±423	32,569	±1,978	12.3%	±0.7
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	359,341	±2,018	24,470	±1,594	6.8%	±0.4
Black or African American alone	88,642	±1,837	20,219	±2,097	22.8%	±2.2
American Indian and Alaska Native alone	2,134	±705	438	±253	20.5%	±10.8
Asian alone	12,953	±576	714	±279	5.5%	±2.1
Native Hawaiian and Other Pacific Islander alone	276	±61	22	±32	8.0%	±11.5
Some other race alone	20,137	±1,750	5,199	±967	25.8%	±4.2
Two or more races	32,216	±2,450	5,242	±1,439	16.3%	±4.2
Hispanic or Latino origin (of any race)	51,299	±218	10,706	±1,668	20.9%	±3.3
White alone, not Hispanic or Latino	345,448	±890	22,695	±1,467	6.6%	±0.4
EDUCATIONAL ATTAINMENT						
Population 25 years and over	357,250	±157	32,790	±1,679	9.2%	±0.5

Less than high school graduate	34,600	±1,865	8,604	±964	24.9%	±2.3
High school graduate (includes equivalency)	81,350	±2,446	11,080	±864	13.6%	±1.0
Some college, associate's degree	100,023	±2,507	8,368	±732	8.4%	±0.7
Bachelor's degree or higher	141,277	±2,717	4,738	±623	3.4%	±0.4
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	269,890	±2,218	16,863	±1,147	6.2%	±0.4
Employed	258,794	±2,482	13,437	±972	5.2%	±0.4
Male	138,062	±1,442	5,243	±578	3.8%	±0.4
Female	120,732	±1,777	8,194	±765	6.8%	±0.7
Unemployed	11,096	±1,082	3,426	±586	30.9%	±4.1
Male	5,461	±720	1,705	±418	31.2%	±6.0
Female	5,635	±753	1,721	±441	30.5%	±6.4
WORK EXPERIENCE						
Population 16 years and over	410,864	±646	40,137	±1,892	9.8%	±0.5
Worked full-time, year-round in the past 12 months	189,513	±2,727	4,303	±577	2.3%	±0.3
Worked part-time or part-year in the past 12 months	91,192	±2,288	12,590	±1,078	13.8%	±1.1
Did not work	130,159	±2,206	23,244	±1,311	17.9%	±0.9
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	26,327	±2,049	(X)	(X)	(X)	(X)
125 percent of poverty level	76,411	±3,667	(X)	(X)	(X)	(X)
150 percent of poverty level	97,157	±4,278	(X)	(X)	(X)	(X)
185 percent of poverty level	128,082	±4,890	(X)	(X)	(X)	(X)
200 percent of poverty level	141,586	±5,215	(X)	(X)	(X)	(X)
300 percent of poverty level	231,264	±5,514	(X)	(X)	(X)	(X)
400 percent of poverty level	309,441	±5,508	(X)	(X)	(X)	(X)

500 percent of poverty level	365,223	±4,798	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	97,353	±2,558	20,727	±1,268	21.3%	±1.1
Male	46,075	±1,780	8,616	±855	18.7%	±1.7
Female	51,278	±1,801	12,111	±834	23.6%	±1.4
15 years	121	±107	121	±107	100.0%	±28.8
16 to 17 years	126	±103	101	±95	80.2%	±31.3
18 to 24 years	9,211	±748	3,058	±498	33.2%	±4.4
25 to 34 years	23,053	±1,124	3,877	±691	16.8%	±2.8
35 to 44 years	11,550	±949	2,187	±366	18.9%	±2.9
45 to 54 years	12,920	±1,012	2,490	±431	19.3%	±3.0
55 to 64 years	15,866	±935	3,843	±553	24.2%	±3.2
65 to 74 years	12,646	±722	2,396	±387	18.9%	±2.9
75 years and over	11,860	±856	2,654	±449	22.4%	±3.5
Mean income deficit for unrelated individuals (dollars)	7,746	±333	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	47,521	±2,065	1,732	±412	3.6%	±0.8
Worked less than full-time, year-round in the past 12 months	18,661	±1,324	6,004	±737	32.2%	±3.1
Did not work	31,171	±1,561	12,991	±981	41.7%	±2.4
Population in housing units for whom poverty status is determined	514,785	±511	55,580	±3,112	10.8%	±0.6

	Spartanburg County, South Carolina					
	Total		Below poverty level		Percent below poverty level	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	322,193	±235	46,447	±2,786	14.4%	±0.9
AGE						
Under 18 years	75,372	±227	14,665	±1,441	19.5%	±1.9
Under 5 years	19,546	±98	3,826	±632	19.6%	±3.2
5 to 17 years	55,826	±173	10,839	±1,176	19.4%	±2.1
Related children of householder under 18 years	75,220	±259	14,513	±1,445	19.3%	±1.9
18 to 64 years	194,335	±144	25,703	±1,615	13.2%	±0.8
18 to 34 years	72,104	±160	11,256	±1,066	15.6%	±1.5
35 to 64 years	122,231	±194	14,447	±1,154	11.8%	±0.9
60 years and over	72,250	±990	9,120	±1,082	12.6%	±1.5
65 years and over	52,486	±126	6,079	±852	11.6%	±1.6
SEX						
Male	156,750	±289	20,592	±1,704	13.1%	±1.1
Female	165,443	±244	25,855	±1,681	15.6%	±1.0
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	224,026	±1,489	24,946	±2,074	11.1%	±0.9
Black or African American alone	64,396	±980	15,822	±1,455	24.6%	±2.1
American Indian and Alaska Native alone	645	±242	163	±154	25.3%	±19.3
Asian alone	7,342	±455	449	±193	6.1%	±2.7
Native Hawaiian and Other Pacific Islander alone	37	±32	0	±32	0.0%	±55.8
Some other race alone	7,432	±1,118	1,318	±473	17.7%	±6.0
Two or more races	18,315	±1,555	3,749	±981	20.5%	±5.0
Hispanic or Latino origin (of any race)	24,718	±107	6,667	±1,193	27.0%	±4.8
White alone, not Hispanic or Latino	216,104	±770	22,524	±1,956	10.4%	±0.9

EDUCATIONAL ATTAINMENT						
Population 25 years and over	219,745	±124	27,173	±1,682	12.4%	±0.8
Less than high school graduate	26,248	±1,537	6,695	±794	25.5%	±2.6
High school graduate (includes equivalency)	67,910	±2,206	10,639	±1,038	15.7%	±1.6
Some college, associate's degree	69,648	±1,817	6,879	±730	9.9%	±1.0
Bachelor's degree or higher	55,939	±2,078	2,960	±501	5.3%	±0.9
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	160,988	±1,944	13,206	±1,247	8.2%	±0.8
Employed	153,436	±2,126	11,034	±1,108	7.2%	±0.7
Male	81,582	±1,231	5,111	±791	6.3%	±1.0
Female	71,854	±1,442	5,923	±738	8.2%	±1.0
Unemployed	7,552	±930	2,172	±499	28.8%	±6.0
Male	3,423	±508	803	±287	23.5%	±8.1
Female	4,129	±716	1,369	±387	33.2%	±7.0
WORK EXPERIENCE						
Population 16 years and over	255,803	±451	33,314	±1,984	13.0%	±0.8
Worked full-time, year-round in the past 12 months	113,130	±2,236	3,877	±649	3.4%	±0.6
Worked part-time or part-year in the past 12 months	55,403	±2,219	10,352	±1,093	18.7%	±1.7
Did not work	87,270	±2,133	19,085	±1,506	21.9%	±1.5
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	21,095	±1,470	(X)	(X)	(X)	(X)
125 percent of poverty level	61,048	±3,225	(X)	(X)	(X)	(X)
150 percent of poverty level	75,303	±3,131	(X)	(X)	(X)	(X)

185 percent of poverty level	99,392	±3,051	(X)	(X)	(X)	(X)
200 percent of poverty level	109,971	±3,351	(X)	(X)	(X)	(X)
300 percent of poverty level	173,593	±3,854	(X)	(X)	(X)	(X)
400 percent of poverty level	220,774	±3,825	(X)	(X)	(X)	(X)
500 percent of poverty level	254,144	±3,329	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	54,195	±1,734	15,057	±1,064	27.8%	±1.9
Male	26,288	±1,284	6,660	±659	25.3%	±2.5
Female	27,907	±1,145	8,397	±839	30.1%	±2.6
15 years	0	±32	0	±32	-	**
16 to 17 years	152	±91	152	±91	100.0%	±24.0
18 to 24 years	5,300	±673	2,391	±538	45.1%	±8.7
25 to 34 years	9,734	±789	2,459	±423	25.3%	±4.0
35 to 44 years	5,524	±658	1,209	±291	21.9%	±4.7
45 to 54 years	7,030	±752	2,063	±358	29.3%	±4.7
55 to 64 years	11,085	±806	3,149	±526	28.4%	±4.6
65 to 74 years	7,855	±716	1,894	±468	24.1%	±5.1
75 years and over	7,515	±656	1,740	±365	23.2%	±4.5
Mean income deficit for unrelated individuals (dollars)	7,950	±318	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	22,631	±1,499	1,085	±309	4.8%	±1.3
Worked less than full-time, year-round in the past 12 months	10,330	±864	4,522	±767	43.8%	±5.0
Did not work	21,234	±1,434	9,450	±991	44.5%	±3.0
Population in housing units for whom poverty status is determined	321,377	±232	45,818	±2,771	14.3%	±0.9

15. Completed Unlawful Discrimination Poster

Unlawful Discrimination

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

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

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

Coordinator: Kelly Dawsey
Phone: 864-848-6271
Address: Greenville-Spartanburg International Airport
2000 GSP Drive, Suite 1
Greer, SC 29651-9202

Discriminacion Illegal

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

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

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

Coordinador: Kelly Dawsey
Teléfono: 864-848-6271
Dirección: El Aeropuerto Internacional de Greenville-Spartanburg
2000, GSP Drive, Suite 1
Greer, SC 29651-9202



U.S. Department of Transportation
Federal Aviation Administration

HQ-101088