



JOHN WAYNE AIRPORT, ORANGE COUNTY TITLE VI GRIEVANCE PROCEDURE

Title VI of the Civil Rights Act of 1964, and other related laws and regulations, provide that no person shall on the grounds of race, color, national origin, sex, age, creed, or religion be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance.

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 of administrative requirements under Title VI or related laws.
2. Not only be for employment matters.¹
3. Allege misconduct by JWA, including Airport employees, or contractors, concessionaires, lessees, or tenants.
4. Concern an Airport facility or actions by JWA, including Airport employees, or contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes they have 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 JWA. 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 the complaint and promptly send copies to County Counsel, the Deputy Airport Director of Public Affairs, and the Airport Director.

In filing a complaint, assistance for persons with disabilities or limited English proficiency is available upon request. You may contact the Government Relations Manager to request communication in an alternate format or language.

The complaint should be submitted as soon as possible, but no later than 180 days after the alleged violation to:

¹ 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.



**JOHN WAYNE
AIRPORT
ORANGE COUNTY**

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John Wayne Airport, Orange County
3160 Airway Avenue, Costa Mesa, CA 92626-4608
Phone: (949) 252-5297
Fax: (949) 252-5178
Email: CivilRights@ocair.com

If a complaint is initially made by phone, it must be supplemented with a written complaint before 180 days after the alleged discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and advised 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 the FAA.

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within one business day of receipt.

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 the FAA.) To transmit complaint information to the FAA, the Coordinator will upload that information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. The Coordinator will also seek technical assistance from the FAA, as needed, throughout the 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 JWA, 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 an assurance that the investigation is being completed as quickly as possible.



Contact with Complainant. The Coordinator will meet with the complainant as needed, over the phone, in person, or virtually, to clarify the issues, obtain additional information, and 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 JWA County Counsel regarding the investigation and the report. County 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 its various committee resources such as JWA's Airport Airline Affairs Committee, Airline Affairs Ad-Hoc Committee, and Tenant/Station Manager Committee.

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 JWA'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 JWA Airport Director at the address below.

John Wayne Airport, Orange County
3160 Airway Avenue
Costa Mesa, CA 92626-4608
Attn: Airport Director

- The written appeal must be received within 15 business days after receipt of the written decision.
- The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- The Airport Director will issue a final written decision in response to the appeal.

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

Intimidation and Retaliation Prohibited. JWA 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 JWA's Title VI Coordinator.