



MIDAMERICA ST. LOUIS AIRPORT
ST. CLAIR COUNTY, ILLINOIS

TITLE VI PLAN

TITLE VI COORDINATOR

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PUBLIC BUILDING COMMISSION
ST. CLAIR COUNTY, ILLINOIS

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**MidAmerica St. Louis Airport (BLV)
Title VI Plan**

1. Title VI Policy Statement¹

St. Clair County, Illinois with Public Building Commission of St. Clair County as authorized Agent d/b/a MidAmerica St. Louis Airport (herein after referred to as BLV) 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.

BLV further assures every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs are federally funded or not BLV 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, BLV will take action to involve them and the general public in the decision-making process.

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

Alice Tejada, available at (618) 566-5321 and BLV.TitleVI@flymidamerica.com, is responsible for overseeing BLV'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
Darren V. James
Airport Director

3/28/2024

Effective Date

3/28/2027

3-Year Expiration Date

¹ This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

2. Administration

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 Director or Coordinator’s name. Significant revisions to our policies or federal guidelines may warrant re-adoption and resubmittal to FAA.

In addition to the Coordinator and BLV’s leadership, the following people also assist with our Title VI program requirements: None

BLV has the following airport program sub-recipients: None

As of the date of this plan, BLV has the following pending applications for Federal financial assistance:

Federal Source	Grant Number	Amount
<i>FAA AIP</i>	<i>None</i>	<i>TBD</i>

In addition, BLV’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:

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

3. Grant and Procurement Assurances

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

BLV will complete standard grant assurances for Title VI and related requirements, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/grant_assurances/#current-assurances.

Clauses/Covenants

- a. All contracts, leases, deeds, licenses, permits, and other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by FAA. See https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. BLV requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and any other agreements.

Description of Oversight Methods for Subcontracts

Contract templates are in the process of being updated and will be used which require all contracts and subcontracts to include the Civil Rights clauses. Subcontracts are audited by Title VI Coordinator to verify they include the template language, for not less than 10 percent of contractors each year.

4. Title VI Coordinator Responsibilities

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

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

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

Among other responsibilities, the Coordinator:

- Proactively ensures that BLV is in compliance with nondiscrimination requirements of Title VI and reports to BLV 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 BLV'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)).

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)

BLV 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/sites/faa.gov/files/about/office_org/headquarters_offices/acr/discrimination_poster.pdf and a completed copy is attached. **See Section 15.**

BLV has posted the above Title VI policy statement at its staff offices.

BLV will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed within 30 days of final review and approval by FAA, by posting the Plan on the Airport’s website:

<https://flymidamerica.com/business/disadvantaged-business-enterprises/>

Unlawful Discrimination 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
Terminal – Baggage Claim	1		
Terminal – Near Vending, ATM & Parking Pay-On-Foot Machines	1		
Terminal – Ticket Counter	1		
TSA Recomposure Area		1	
Hold Area/Room		3	

Outreach to Affected Communities

BLV 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 in social media, general circulation newspapers, community newspapers, email broadcast, press release and website. BLV contacts leaders and

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

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.

BLV will create a detailed Community Participation Plan (CPP) by June 1, 2024. A copy of the plan will be available at <https://flymidamerica.com/business/disadvantaged-business-enterprises/> or a hard copy will be available in the Administrative office.

To ensure that the community is effectively informed of and able to participate in public hearings, BLV ensures that upon request, public notices are translated. Notices of public meetings include information on how to obtain free translation services. Additionally, 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, BLV will be able to identify, understand, and engage with communities. In doing so, BLV needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by BLV's airport program.

Affected Communities⁴	Population
<i>Lebanon</i>	<i>4,125</i>
<i>Mascoutah</i>	<i>8,624</i>
<i>O'Fallon</i>	<i>31,989</i>
<i>Scott Air Force Base</i>	<i>3,988</i>
<i>Shiloh</i>	<i>13,270</i>

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

We have identified the following facts about the Affected Communities:

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.

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.

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,” BLV is collecting information about affected and potentially affected low-income communities. According to U.S. Census Report, S1701: Poverty Status in the Past 12 Months, the overall poverty level for St. Clair County, Illinois is approximately 15.8 %. The poverty rate remains high compared with the rest of the State of Illinois. The poverty rates for the specific Affected Communities are as follows:

Affected Communities ⁶	Poverty Rate
<i>Lebanon</i>	6.2%
<i>Mascoutah</i>	10.0%
<i>O’Fallon</i>	3.3%
<i>Scott Air Force Base</i>	6.3%
<i>Shiloh</i>	6.1%

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 follows⁷:

Affected Community: Lebanon

Total Affected Community Population: 4,125

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	3,422	81.83%
<i>Black or African American</i>	488	11.67%
<i>American Indian or Alaska Native</i>	22	0.53%
<i>Asian</i>	27	0.65%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	57	1.36%
<i>More than one</i>	166	3.97%

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.

⁶ “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.

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

Affected Community: Mascoutah**Total Affected Community Population: 8,624**

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	7,074	77.62%
<i>Black or African American</i>	222	2.44%
<i>American Indian or Alaska Native</i>	146	1.6%
<i>Asian</i>	227	2.49%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	666	7.31%
<i>More than one</i>	779	8.55%

Affected Community: O'Fallon**Total Affected Community Population: 31,989**

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	23,443	70.41%
<i>Black or African American</i>	4,077	12.25%
<i>American Indian or Alaska Native</i>	16	0.05%
<i>Asian</i>	1,160	3.48%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	1,552	4.66%
<i>More than one</i>	3,046	9.15%

Affected Community: Scott Air Force Base**Total Affected Community Population: 3,988**

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	2,487	58.61%
<i>Black or African American</i>	1,217	28.68%
<i>American Indian or Alaska Native</i>	0	0.0%
<i>Asian</i>	64	1.51%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	294	6.93%
<i>More than one</i>	181	4.27%

Affected Community: Shiloh

Total Affected Community Population: 13,270

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>White</i>	9,098	66.19%
<i>Black or African American</i>	2,843	20.68%
<i>American Indian or Alaska Native</i>	32	0.23%
<i>Asian</i>	232	1.69%
<i>Native Hawaiian or Other Pacific Islander</i>	0	0.0%
<i>Hispanic or Latino</i>	587	4.27%
<i>More than one</i>	953	6.93%

Limited English Proficiency (LEP).

The goal of all language access planning and implementation is to ensure that BLV communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁸ 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.⁹ The safe harbor for our community is 1,000. Please refer to the end of this document to find data for all languages in our community.

See Section 14: [Table B16001: Language Spoken at Home by Ability to Speak English](#)

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>Spanish</i>	247	+/-39
<i>German</i>	53	+/-19
<i>Chinese</i>	56	+/-23.6
<i>Korean</i>	180	+/-47.4
<i>Thai</i>	74	+/-26.4

⁸ Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

⁹ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

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			
<i>German</i>	X			
<i>Chinese</i>	X			
<i>Korean</i>	X			
<i>Thai</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

None

This information is updated annually¹⁰ 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:%20Language%20Spoken%20at%20Home%20by%20Ability%20to%20Speak%20English%20for%20the%20Population%205%20Years%20and%20Over&q=160XX00US1742496,1747423,1755249,1769524

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

- BLV conducts occasional surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.
- BLV asks for voluntary disclosure of demographic information during bidding and outreach processes.

¹⁰ Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan’s 3-year period.

Staff and Advisory Board Diversity.

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

Description of Employee and Advisory Board Demographic Information Collection Methods

- Employees are asked to submit voluntary confidential demographic information at time of hiring.
- Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter 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 BLV activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.¹¹

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
<i>Passenger Terminal</i>	<i>None</i>
<i>Maintenance Facility</i>	<i>None</i>
<i>ARFF</i>	<i>None</i>

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

¹¹ In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

Airport Facility Construction Projects	Affected Community Impacted by Construction of the Facility
<i>Terminal Apron Expansion</i>	<i>None</i>
<i>Passenger Terminal Expansion, Phase 4</i>	<i>None</i>
<i>Runway Shoulder Rehabilitation</i>	<i>None</i>
<i>Runway Shoulder Widening</i>	<i>None</i>
<i>Runway Blast Pads</i>	<i>None</i>
<i>Runway Lighting Improvements</i>	<i>None</i>
<i>ARFF & Electrical Vault Generators</i>	<i>None</i>
<i>SRE Facility</i>	<i>None</i>
<i>Airside Service Road, Phase 2</i>	<i>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: None

8. Limited English Proficiency (LEP)

Executive Order 13166

In creating a Language Assistance Plan, BLV 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>
<i>German</i>
<i>Chinese</i>
<i>Korean</i>
<i>Thai</i>

BLV also collects data for languages spoken by airport guests.¹² Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
Airline-provided data	N/A
Assumption from flight origin / destination	N/A

¹² We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

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

Language

None

BLV 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 BLV 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>Propio Language Services</i>	<i>All above languages</i>

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>Airport website translate view</i>	<i>Arabic, Chinese, Dutch, French, German, Italian, Japanese, Korean, Norwegian, Polish, Portuguese, Russian, Spanish, Urdu, Vietnamese</i>
<i>Volunteer multi-lingual staff pool</i>	<i>Spanish, Japanese</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Propio Language Services</i>	<i>All above languages</i>

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Airport Language Assistance page</i>	<i>All above languages</i>

Description of Interpretation Assistance Processes

- Airport Administrative Office maintains a list of multilingual employees, the languages they speak, and their associated office telephone numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. These employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.
- The airport contracts with the Propio Language Services 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 Propio Language Services and “parks” the request in the queue for the appropriate language. Propio Language Services operators will coordinate connect the requesting party to an interpreter for the duration of the call. The completed call is then logged in the Language Line Service binder. 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 St. Clair County Transit District (SCCTD) 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
St. Clair County	Fixed-route buses	Existing
St. Clair County	Paratransit vans	Existing
St. Clair County	Light Rail	Planned

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
Food and Beverage Concessionaire	Advertise RFP through online airport trade websites, Airport and St. Clair County website, notices sent via current outreach email lists.
Parking Lot Operations Contract	Advertise RFP through online airport trade websites, Airport and St. Clair County website, notices sent via current outreach email lists.

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 in BLV’s Engineering and Planning 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 requirements¹³
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹⁴

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, BLV must notify FAA

¹³ Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

¹⁴ Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

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 matters¹⁵
3. Allege misconduct by BLV including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by BLV including airport employees, contractors, concessionaires, lessees, or tenants.

Rights. Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with BLV.¹⁶ Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint. The Coordinator will log in the complaint and promptly send copies of the complaint to the BLV office named in the complaint and the Airport Director. **See Attachment A: BLV Title VI Complaint Form.**

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

Alice Tejada
Engineering and Planning
MidAmerica St. Louis Airport
9656 Air Terminal Dr., Suite 250
Mascoutah, IL 62258
(618) 566-5321

TitleVI@flymidamerica.com

¹⁵ Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

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

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

Discrimination Complaint Referral Procedure

Internal Complaint Referral. All Title VI complaints must be promptly forwarded to the Coordinator within 48 hours.

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 email the FAA Office of Civil Rights analyst(s), as well as upload the relevant information to the FAA Civil Rights Connect System, which issues automated notifications to FAA staff. 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 BLV, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation. The Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant. The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

Investigation Report. After completing the investigation, the Coordinator will prepare a written report.

Consultation with Legal Counsel. In each case, the Coordinator will consult with Airport 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 or mediation.

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 BLV'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 email and/or the FAA Civil Rights Connect System.

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

- The complainant may appeal in writing to the Airport Director.
- The written appeal must be received within seven (7) 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, BLV will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited. BLV 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 Title VI Coordinator.

See Attachment A: BLV Title VI Complaint Form

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

Website, In-person, and Other Distribution Methods

- 1 Airport website, Title VI page at <https://flymidamerica.com/business/disadvantaged-business-enterprises/>
 - 2 A copy of the procedure will be available in the Airport Administrative Office.
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14. Population / Language Data

Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701).

14. Population / Language Data Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701)

Label	Lebanon city, Illinois					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	4,125	±538	257	±114	6.2%	±2.6
AGE						
Under 18 years	588	±229	30	±37	5.1%	±6.5
Under 5 years	65	±74	4	±8	6.2%	±17.8
5 to 17 years	523	±185	26	±31	5.0%	±6.2
Related children of householder under 18 years	575	±230	17	±31	3.0%	±5.4
18 to 64 years	2,802	±569	181	±86	6.5%	±2.7
18 to 34 years	1,485	±519	139	±81	9.4%	±5.1
35 to 64 years	1,317	±285	42	±42	3.2%	±3.2
60 years and over	939	±295	49	±70	5.2%	±7.0
65 years and over	735	±224	46	±69	6.3%	±8.8
SEX						
Male	1,826	±445	106	±80	5.8%	±3.5
Female	2,299	±294	151	±98	6.6%	±4.1
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	3,422	±421	79	±64	2.3%	±1.9
Black or African American alone	488	±366	116	±90	23.8%	±11.7
American Indian and Alaska Native alone	22	±37	0	±12	0.0%	±65.6
Asian alone	27	±36	17	±31	63.0%	±62.1
Native Hawaiian and Other Pacific Islander alone	0	±12	0	±12	-	**
Some other race alone	0	±12	0	±12	-	**
Two or more races	166	±108	45	±52	27.1%	±25.0
Hispanic or Latino origin (of any race)	57	±58	17	±31	29.8%	±48.3
White alone, not Hispanic or Latino	3,422	±421	79	±64	2.3%	±1.9
EDUCATIONAL ATTAINMENT						
Population 25 years and over	2,717	±305	100	±75	3.7%	±2.8
Less than high school graduate	132	±96	4	±4	3.0%	±3.7
High school graduate (includes equivalency)	350	±135	23	±27	6.6%	±7.5
Some college, associate's degree	1,151	±281	59	±61	5.1%	±4.9
Bachelor's degree or higher	1,084	±271	14	±22	1.3%	±2.1
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	2,325	±457	66	±61	2.8%	±2.7
Employed	2,295	±457	66	±61	2.9%	±2.7
Male	984	±251	1	±4	0.1%	±0.4
Female	1,311	±320	65	±60	5.0%	±4.4
Unemployed	30	±39	0	±12	0.0%	±56.2
Male	16	±28	0	±12	0.0%	±76.9
Female	14	±23	0	±12	0.0%	±82.3
WORK EXPERIENCE						
Population 16 years and over	3,663	±509	240	±104	6.6%	±2.7
Worked full-time, year-round in the past 12 months	1,456	±370	0	±12	0.0%	±2.4
Worked part-time or part-year in the past 12 months	1,122	±444	76	±63	6.8%	±7.1
Did not work	1,085	±280	164	±109	15.1%	±8.9
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	150	±78	(X)	(X)	(X)	(X)
125 percent of poverty level	496	±212	(X)	(X)	(X)	(X)
150 percent of poverty level	761	±356	(X)	(X)	(X)	(X)
185 percent of poverty level	909	±373	(X)	(X)	(X)	(X)
200 percent of poverty level	1,025	±392	(X)	(X)	(X)	(X)
300 percent of poverty level	1,524	±500	(X)	(X)	(X)	(X)
400 percent of poverty level	2,183	±540	(X)	(X)	(X)	(X)
500 percent of poverty level	3,120	±605	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	1,156	±418	231	±102	20.0%	±8.5
Male	617	±373	106	±80	17.2%	±7.6
Female	539	±220	125	±87	23.2%	±13.9
15 years	0	±12	0	±12	-	**
16 to 17 years	13	±22	13	±22	100.0%	±85.4
18 to 24 years	488	±331	127	±77	26.0%	±13.7
25 to 34 years	182	±130	3	±5	1.6%	±3.2
35 to 44 years	71	±74	1	±3	1.4%	±5.6
45 to 54 years	87	±92	3	±6	3.4%	±11.2
55 to 64 years	103	±85	38	±41	36.9%	±38.9
65 to 74 years	125	±94	46	±69	36.8%	±39.3
75 years and over	87	±97	0	±12	0.0%	±31.9
Mean income deficit for unrelated individuals (dollars)	9,026	±3,309	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	362	±203	0	±12	0.0%	±9.2
Worked less than full-time, year-round in the past 12 months	373	±265	67	±60	18.0%	±29.2
Did not work	421	±194	164	±109	39.0%	±22.7
Population in housing units for whom poverty status is determined	4,111	±539	246	±113	6.0%	±2.6

14. Population / Language Data

Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701)

Label	Mascoutah city, Illinois					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	8,624	±216	863	±449	10.0%	±5.2
AGE						
Under 18 years	2,182	±199	338	±262	15.5%	±11.6
Under 5 years	661	±242	120	±120	18.2%	±18.5
5 to 17 years	1,521	±192	218	±179	14.3%	±11.4
Related children of householder under 18 years	2,182	±199	338	±262	15.5%	±11.6
18 to 64 years	5,456	±288	441	±212	8.1%	±3.9
18 to 34 years	1,948	±282	294	±165	15.1%	±8.2
35 to 64 years	3,508	±325	147	±83	4.2%	±2.4
60 years and over	1,427	±275	84	±57	5.9%	±3.7
65 years and over	986	±203	84	±57	8.5%	±5.5
SEX						
Male	4,262	±264	270	±161	6.3%	±3.8
Female	4,362	±271	593	±311	13.6%	±6.9
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	7,074	±567	345	±159	4.9%	±2.2
Black or African American alone	222	±145	4	±1	1.8%	±1.8
American Indian and Alaska Native alone	146	±211	146	±211	100.0%	±21.1
Asian alone	227	±171	0	±17	0.0%	±14.3
Native Hawaiian and Other Pacific islander alone	0	±17	0	±17	-	**
Some other race alone	176	±136	0	±17	0.0%	±17.9
Two or more races	779	±355	368	±352	47.2%	±34.5
Hispanic or Latino origin (of any race)	666	±363	337	±355	50.6%	±37.8
White alone, not Hispanic or Latino	6,859	±556	345	±159	5.0%	±2.3
EDUCATIONAL ATTAINMENT						
Population 25 years and over	5,659	±348	345	±146	6.1%	±2.7
Less than high school graduate	167	±101	5	±2	3.0%	±2.4
High school graduate (includes equivalency)	1,484	±293	170	±109	11.5%	±7.0
Some college, associate's degree	2,169	±345	115	±92	5.3%	±4.2
Bachelor's degree or higher	1,839	±256	55	±57	3.0%	±3.1
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	4,592	±335	293	±179	6.4%	±3.9
Employed	4,386	±353	271	±178	6.2%	±4.0
Male	2,167	±261	80	±73	3.7%	±3.4
Female	2,219	±275	191	±134	8.6%	±5.8
Unemployed	206	±154	22	±35	10.7%	±17.8
Male	148	±142	22	±35	14.9%	±26.1
Female	58	±62	0	±17	0.0%	±40.4
WORK EXPERIENCE						
Population 16 years and over	6,619	±267	549	±232	8.3%	±3.5
Worked full-time, year-round in the past 12 months	3,214	±312	43	±46	1.3%	±1.5
Worked part-time or part-year in the past 12 months	1,769	±276	250	±160	14.1%	±8.3
Did not work	1,636	±232	256	±110	15.6%	±6.3
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	128	±79	(X)	(X)	(X)	(X)
125 percent of poverty level	988	±446	(X)	(X)	(X)	(X)
150 percent of poverty level	1,097	±450	(X)	(X)	(X)	(X)
185 percent of poverty level	1,399	±526	(X)	(X)	(X)	(X)
200 percent of poverty level	1,706	±534	(X)	(X)	(X)	(X)
300 percent of poverty level	2,889	±620	(X)	(X)	(X)	(X)
400 percent of poverty level	4,486	±710	(X)	(X)	(X)	(X)
500 percent of poverty level	5,464	±672	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	1,376	±313	228	±115	16.6%	±7.0
Male	631	±192	64	±54	10.1%	±7.9
Female	745	±200	164	±96	22.0%	±10.3
15 years	0	±17	0	±17	-	**
16 to 17 years	0	±17	0	±17	-	**
18 to 24 years	198	±130	88	±71	44.4%	±18.2
25 to 34 years	215	±109	0	±17	0.0%	±15.0
35 to 44 years	86	±68	0	±17	0.0%	±32.1
45 to 54 years	250	±107	65	±69	26.0%	±26.7
55 to 64 years	271	±109	5	±2	1.8%	±1.4
65 to 74 years	220	±97	23	±33	10.5%	±14.3
75 years and over	136	±96	47	±38	34.6%	±24.2
Mean income deficit for unrelated individuals (dollars)	7,117	±1,712	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	637	±205	0	±17	0.0%	±5.3
Worked less than full-time, year-round in the past 12 months	317	±149	88	±71	27.8%	±18.5
Did not work	422	±183	140	±87	33.2%	±14.0
Population in housing units for whom poverty status is determined	8,615	±216	854	±449	9.9%	±5.2

14. Population / Language Data Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701)

Label	O'Fallon city, Illinois					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	31,989	±137	1,055	±508	3.3%	±1.6
AGE						
Under 18 years	8,930	±496	400	±391	4.5%	±4.4
Under 5 years	2,251	±473	146	±183	6.5%	±7.7
5 to 17 years	6,679	±462	254	±219	3.8%	±3.4
Related children of householder under 18 years	8,900	±500	370	±388	4.2%	±4.3
18 to 64 years	18,079	±561	501	±179	2.8%	±1.0
18 to 34 years	6,016	±554	268	±129	4.5%	±2.1
35 to 64 years	12,063	±691	233	±98	1.9%	±0.8
60 years and over	6,520	±500	182	±99	2.8%	±1.5
65 years and over	4,980	±470	154	±92	3.1%	±1.9
SEX						
Male	15,660	±475	377	±214	2.4%	±1.4
Female	16,329	±468	678	±326	4.2%	±2.0
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	23,443	±859	564	±175	2.4%	±0.8
Black or African American alone	4,077	±734	389	±425	9.5%	±9.7
American Indian and Alaska Native alone	16	±23	0	±26	0.0%	±76.9
Asian alone	1,160	±404	17	±32	1.5%	±3.0
Native Hawaiian and Other Pacific islander alone	0	±26	0	±26	-	**
Some other race alone	247	±174	0	±26	0.0%	±13.2
Two or more races	3,046	±527	85	±90	2.8%	±3.0
Hispanic or Latino origin (of any race)	1,552	±440	47	±74	3.0%	±4.7
White alone, not Hispanic or Latino	22,820	±884	564	±175	2.5%	±0.8
EDUCATIONAL ATTAINMENT						
Population 25 years and over	21,004	±494	530	±165	2.5%	±0.8
Less than high school graduate	812	±236	61	±68	7.5%	±8.1
High school graduate (includes equivalency)	3,045	±461	182	±91	6.0%	±3.0
Some college, associate's degree	6,530	±655	144	±78	2.2%	±1.3
Bachelor's degree or higher	10,617	±623	143	±69	1.3%	±0.6
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	15,305	±681	327	±156	2.1%	±1.0
Employed	14,758	±703	238	±129	1.6%	±0.9
Male	7,704	±485	50	±45	0.6%	±0.6
Female	7,054	±421	188	±119	2.7%	±1.7
Unemployed	547	±157	89	±83	16.3%	±13.3
Male	261	±88	25	±29	9.6%	±10.2
Female	286	±120	64	±76	22.4%	±23.3
WORK EXPERIENCE						
Population 16 years and over	23,997	±524	703	±209	2.9%	±0.9
Worked full-time, year-round in the past 12 months	11,703	±608	67	±57	0.6%	±0.5
Worked part-time or part-year in the past 12 months	5,179	±521	208	±113	4.0%	±2.1
Did not work	7,115	±573	428	±159	6.0%	±2.3
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	694	±477	(X)	(X)	(X)	(X)
125 percent of poverty level	1,716	±552	(X)	(X)	(X)	(X)
150 percent of poverty level	2,382	±592	(X)	(X)	(X)	(X)
185 percent of poverty level	4,275	±660	(X)	(X)	(X)	(X)
200 percent of poverty level	4,611	±655	(X)	(X)	(X)	(X)
300 percent of poverty level	9,184	±1,107	(X)	(X)	(X)	(X)
400 percent of poverty level	13,812	±1,095	(X)	(X)	(X)	(X)
500 percent of poverty level	18,953	±1,215	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	3,842	±462	448	±129	11.7%	±3.3
Male	1,814	±332	146	±72	8.0%	±3.7
Female	2,028	±367	302	±115	14.9%	±5.2
15 years	5	±9	5	±9	100.0%	±100.0
16 to 17 years	25	±40	25	±40	100.0%	±61.6
18 to 24 years	271	±142	75	±73	27.7%	±23.7
25 to 34 years	925	±267	67	±51	7.2%	±5.4
35 to 44 years	447	±179	52	±49	11.6%	±10.8
45 to 54 years	507	±168	44	±47	8.7%	±9.0
55 to 64 years	426	±146	51	±38	12.0%	±9.0
65 to 74 years	540	±168	18	±20	3.3%	±3.9
75 years and over	696	±269	111	±85	15.9%	±11.7
Mean income deficit for unrelated individuals (dollars)	8,165	±1,475	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	1,734	±327	0	±26	0.0%	±2.0
Worked less than full-time, year-round in the past 12 months	713	±230	168	±100	23.6%	±11.2
Did not work	1,395	±329	280	±120	20.1%	±8.7
Population in housing units for whom poverty status is determined	31,989	±137	1,055	±508	3.3%	±1.6

14. Population / Language Data Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701)

Label	Scott AFB CDP, Illinois					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	3,988	±745	252	±255	6.3%	±6.7
AGE						
Under 18 years	1,805	±417	151	±173	8.4%	±10.0
Under 5 years	539	±242	43	±43	8.0%	±8.9
5 to 17 years	1,266	±343	108	±133	8.5%	±11.0
Related children of householder under 18 years	1,805	±417	151	±173	8.4%	±10.0
18 to 64 years	2,141	±427	101	±85	4.7%	±4.2
18 to 34 years	808	±250	46	±37	5.7%	±4.5
35 to 64 years	1,333	±425	55	±74	4.1%	±6.1
60 years and over	80	±55	5	±8	6.3%	±10.9
65 years and over	42	±28	0	±12	0.0%	±47.5
SEX						
Male	2,166	±419	155	±176	7.2%	±8.4
Female	1,822	±414	97	±82	5.3%	±4.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	2,487	±493	247	±254	9.9%	±10.1
Black or African American alone	1,217	±930	5	±8	0.4%	±0.8
American Indian and Alaska Native alone	0	±12	0	±12	-	**
Asian alone	64	±43	0	±12	0.0%	±38.5
Native Hawaiian and Other Pacific islander alone	0	±12	0	±12	-	**
Some other race alone	39	±41	0	±12	0.0%	±49.3
Two or more races	181	±110	0	±12	0.0%	±17.5
Hispanic or Latino origin (of any race)	294	±220	5	±8	1.7%	±3.4
White alone, not Hispanic or Latino	2,295	±496	247	±254	10.8%	±11.0
EDUCATIONAL ATTAINMENT						
Population 25 years and over	2,041	±437	89	±82	4.4%	±4.2
Less than high school graduate	271	±270	0	±12	0.0%	±12.1
High school graduate (includes equivalency)	179	±89	11	±13	6.1%	±6.8
Some college, associate's degree	738	±246	64	±75	8.7%	±10.2
Bachelor's degree or higher	853	±250	14	±13	1.6%	±1.6
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	1,073	±302	12	±20	1.1%	±1.9
Employed	1,054	±300	12	±20	1.1%	±2.0
Male	563	±255	0	±12	0.0%	±6.0
Female	491	±144	12	±20	2.4%	±4.0
Unemployed	19	±17	0	±12	0.0%	±70.6
Male	4	±8	0	±12	0.0%	±100.0
Female	15	±15	0	±12	0.0%	±79.5
WORK EXPERIENCE						
Population 16 years and over	2,234	±438	122	±114	5.5%	±5.2
Worked full-time, year-round in the past 12 months	1,392	±276	41	±41	2.9%	±3.1
Worked part-time or part-year in the past 12 months	267	±131	12	±20	4.5%	±7.3
Did not work	575	±216	69	±71	12.0%	±13.2
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	27	±37	(X)	(X)	(X)	(X)
125 percent of poverty level	252	±255	(X)	(X)	(X)	(X)
150 percent of poverty level	303	±267	(X)	(X)	(X)	(X)
185 percent of poverty level	560	±356	(X)	(X)	(X)	(X)
200 percent of poverty level	607	±367	(X)	(X)	(X)	(X)
300 percent of poverty level	2,494	±883	(X)	(X)	(X)	(X)
400 percent of poverty level	2,863	±814	(X)	(X)	(X)	(X)
500 percent of poverty level	3,452	±742	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	154	±102	19	±21	12.3%	±11.3
Male	100	±74	0	±12	0.0%	±28.8
Female	54	±46	19	±21	35.2%	±21.6
15 years	0	±12	0	±12	-	**
16 to 17 years	0	±12	0	±12	-	**
18 to 24 years	64	±79	12	±20	18.8%	±16.9
25 to 34 years	28	±33	0	±12	0.0%	±58.2
35 to 44 years	39	±41	0	±12	0.0%	±49.3
45 to 54 years	10	±11	0	±12	0.0%	±97.3
55 to 64 years	13	±12	7	±9	53.8%	±41.9
65 to 74 years	0	±12	0	±12	-	**
75 years and over	0	±12	0	±12	-	**
Mean income deficit for unrelated individuals (dollars)	3,016	±2,932	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	126	±86	0	±12	0.0%	±23.9
Worked less than full-time, year-round in the past 12 months	20	±24	12	±20	60.0%	±60.0
Did not work	8	±10	7	±9	87.5%	±33.4
Population in housing units for whom poverty status is determined	3,988	±745	252	±255	6.3%	±6.7

14. Population / Language Data

Poverty Data for Affected Communities

Source: American Community Survey, 2022: Poverty Status in the Past 12 months (S1701)

Label	Shiloh village, Illinois					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	13,270	±311	803	±324	6.1%	±2.5
AGE						
Under 18 years	2,961	±540	165	±127	5.6%	±4.5
Under 5 years	567	±199	16	±30	2.8%	±5.3
5 to 17 years	2,394	±499	149	±111	6.2%	±5.0
Related children of householder under 18 years	2,917	±542	121	±113	4.1%	±4.1
18 to 64 years	8,070	±590	513	±227	6.4%	±2.8
18 to 34 years	2,469	±547	152	±125	6.2%	±5.3
35 to 64 years	5,601	±594	361	±187	6.4%	±3.2
60 years and over	3,091	±620	154	±98	5.0%	±3.1
65 years and over	2,239	±541	125	±84	5.6%	±3.6
SEX						
Male	6,672	±373	292	±172	4.4%	±2.5
Female	6,598	±423	511	±212	7.7%	±3.3
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	9,098	±733	566	±250	6.2%	±2.7
Black or African American alone	2,843	±677	167	±150	5.9%	±5.4
American Indian and Alaska Native alone	32	±52	0	±19	0.0%	±54.4
Asian alone	232	±136	0	±19	0.0%	±14.0
Native Hawaiian and Other Pacific Islander alone	0	±19	0	±19	-	**
Some other race alone	112	±92	14	±23	12.5%	±14.7
Two or more races	953	±417	56	±99	5.9%	±9.7
Hispanic or Latino origin (of any race)	587	±316	61	±63	10.4%	±10.8
White alone, not Hispanic or Latino	8,838	±721	519	±245	5.9%	±2.7
EDUCATIONAL ATTAINMENT						
Population 25 years and over	9,346	±596	561	±233	6.0%	±2.4
Less than high school graduate	208	±125	0	±19	0.0%	±15.4
High school graduate (includes equivalency)	1,841	±467	99	±85	5.4%	±4.6
Some college, associate's degree	3,537	±546	250	±176	7.1%	±4.8
Bachelor's degree or higher	3,760	±454	212	±140	5.6%	±3.6
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	7,006	±543	302	±180	4.3%	±2.6
Employed	6,872	±531	238	±155	3.5%	±2.3
Male	3,552	±357	57	±62	1.6%	±1.7
Female	3,320	±375	181	±134	5.5%	±4.2
Unemployed	134	±95	64	±65	47.8%	±32.3
Male	62	±55	38	±46	61.3%	±45.2
Female	72	±70	26	±41	36.1%	±48.0
WORK EXPERIENCE						
Population 16 years and over	10,787	±513	691	±260	6.4%	±2.4
Worked full-time, year-round in the past 12 months	5,416	±590	15	±31	0.3%	±0.6
Worked part-time or part-year in the past 12 months	2,298	±398	223	±146	9.7%	±6.1
Did not work	3,073	±508	453	±201	14.7%	±6.0
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	382	±203	(X)	(X)	(X)	(X)
125 percent of poverty level	914	±342	(X)	(X)	(X)	(X)
150 percent of poverty level	1,188	±407	(X)	(X)	(X)	(X)
185 percent of poverty level	1,464	±473	(X)	(X)	(X)	(X)
200 percent of poverty level	1,702	±512	(X)	(X)	(X)	(X)
300 percent of poverty level	4,668	±1,140	(X)	(X)	(X)	(X)
400 percent of poverty level	6,642	±958	(X)	(X)	(X)	(X)
500 percent of poverty level	8,009	±936	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	2,183	±416	503	±202	23.0%	±7.8
Male	827	±261	123	±83	14.9%	±9.8
Female	1,356	±280	380	±182	28.0%	±11.9
15 years	0	±19	0	±19	-	**
16 to 17 years	44	±61	44	±61	100.0%	±46.4
18 to 24 years	133	±156	52	±90	39.1%	±36.0
25 to 34 years	353	±152	36	±48	10.2%	±13.5
35 to 44 years	144	±101	37	±47	25.7%	±27.5
45 to 54 years	478	±289	95	±119	19.9%	±17.9
55 to 64 years	471	±191	139	±102	29.5%	±17.3
65 to 74 years	290	±156	21	±37	7.2%	±12.4
75 years and over	270	±120	79	±62	29.3%	±21.1
Mean income deficit for unrelated individuals (dollars)	6,549	±2,233	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	1,042	±289	3	±8	0.3%	±0.7
Worked less than full-time, year-round in the past 12 months	321	±157	160	±132	49.8%	±25.3
Did not work	820	±240	340	±171	41.5%	±14.5
Population in housing units for whom poverty status is determined	13,251	±310	788	±326	5.9%	±2.5

Language Data for Affected Communities

Source: American Community Survey, 2022: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (B16001).

14. Language Data for Affected Communities

Source: American Community Survey, 2012: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (B16001)

Label	Lebanon city, Illinois		Mascoutah city, Illinois		O'Fallon city, Illinois		Scott AFB CDP, Illinois		Shiloh village, Illinois	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:	4,006	±364	7,566	±307	27,335	±303	2,335	±311	12,212	±255
Speak only English	3,723	±459	7,341	±351	25,931	±430	2,184	±329	11,071	±485
Spanish or Spanish Creole:	0	±11	38	±33	383	±160	69	±90	594	±324
Speak English "very well"	0	±11	31	±30	333	±140	48	±86	425	±273
Speak English less than "very well"	0	±11	7	±11	50	±45	21	±26	169	±102
French (Incl. Patois, Cajun):	8	±16	0	±15	73	±52	0	±11	17	±28
Speak English "very well"	8	±16	0	±15	33	±44	0	±11	17	±28
Speak English less than "very well"	0	±11	0	±15	40	±38	0	±11	0	±17
French Creole:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Italian:	0	±11	0	±15	19	±21	0	±11	13	±22
Speak English "very well"	0	±11	0	±15	6	±9	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	13	±19	0	±11	13	±22
Portuguese or Portuguese Creole:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
German:	55	±54	26	±31	215	±120	0	±11	109	±102
Speak English "very well"	55	±54	26	±31	162	±106	0	±11	109	±102
Speak English less than "very well"	0	±11	0	±15	53	±41	0	±11	0	±17
Yiddish:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Other West Germanic languages:	0	±11	0	±15	0	±20	8	±12	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	8	±12	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Scandinavian languages:	0	±11	37	±59	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	37	±59	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Greek:	0	±11	0	±15	0	±20	0	±11	17	±25
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	17	±25
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Russian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Polish:	0	±11	0	±15	23	±22	0	±11	34	±57
Speak English "very well"	0	±11	0	±15	23	±22	0	±11	34	±57
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Serbo-Croatian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Other Slavic languages:	0	±11	0	±15	40	±64	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	16	±26	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	24	±38	0	±11	0	±17
Armenian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Persian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Gujarati:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Hindi:	0	±11	0	±15	93	±121	0	±11	43	±66
Speak English "very well"	0	±11	0	±15	93	±121	0	±11	43	±66
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Urdu:	0	±11	0	±15	0	±20	0	±11	6	±15
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	6	±15
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Other Indic languages:	32	±51	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	15	±25	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	17	±27	0	±15	0	±20	0	±11	0	±17
Other Indo-European languages:	0	±11	0	±15	0	±20	5	±7	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	5	±7	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Chinese:	0	±11	0	±15	91	±72	0	±11	13	±21
Speak English "very well"	0	±11	0	±15	35	±27	0	±11	13	±21
Speak English less than "very well"	0	±11	0	±15	56	±64	0	±11	0	±17
Japanese:	0	±11	0	±15	30	±38	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	30	±38	0	±11	0	±17
Korean:	0	±11	114	±179	168	±147	18	±29	21	±35
Speak English "very well"	0	±11	88	±138	32	±37	0	±11	21	±35
Speak English less than "very well"	0	±11	26	±42	136	±138	18	±29	0	±17
Mon-Khmer, Cambodian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Hmong:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Thai:	0	±11	0	±15	10	±17	3	±5	122	±88
Speak English "very well"	0	±11	0	±15	0	±20	3	±5	58	±92
Speak English less than "very well"	0	±11	0	±15	10	±17	0	±11	64	±78
Laotian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Vietnamese:	0	±11	0	±15	41	±49	2	±4	13	±21
Speak English "very well"	0	±11	0	±15	25	±29	0	±11	13	±21
Speak English less than "very well"	0	±11	0	±15	16	±22	2	±4	0	±17
Other Asian languages:	0	±11	0	±15	51	±52	0	±11	18	±26
Speak English "very well"	0	±11	0	±15	51	±52	0	±11	18	±26
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Tagalog:	0	±11	0	±15	126	±74	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	81	±63	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	45	±41	0	±11	0	±17

14. Language Data for Affected Communities

Source: American Community Survey, 2022: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (B16001)

Label	Lebanon city, Illinois		Mascoutah city, Illinois		O'Fallon city, Illinois		Scott AFB CDP, Illinois		Shiloh village, Illinois	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Other Pacific Island languages:	0	±11	0	±15	6	±11	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	6	±11	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Navajo:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Other Native North American languages:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Hungarian:	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
Arabic:	0	±11	10	±17	29	±26	5	±8	77	±204
Speak English "very well"	0	±11	10	±17	14	±16	5	±8	63	±166
Speak English less than "very well"	0	±11	0	±15	15	±18	0	±11	14	±38
Hebrew:	0	±11	0	±15	6	±10	0	±11	0	±17
Speak English "very well"	0	±11	0	±15	6	±10	0	±11	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17
African languages:	188	±275	0	±15	0	±20	32	±47	44	±70
Speak English "very well"	188	±275	0	±15	0	±20	32	±47	12	±19
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	32	±51
Other and unspecified languages:	0	±11	0	±15	0	±20	9	±12	0	±17
Speak English "very well"	0	±11	0	±15	0	±20	9	±12	0	±17
Speak English less than "very well"	0	±11	0	±15	0	±20	0	±11	0	±17

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: Alice Tejada
Phone: (618) 566-5321
Address: 9656 Air Terminal Dr., Mascoutah, IL 62258
TitleVI@flymidamerica.com

Discriminacion Ilegal

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.

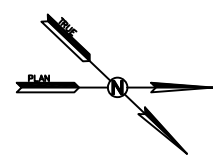
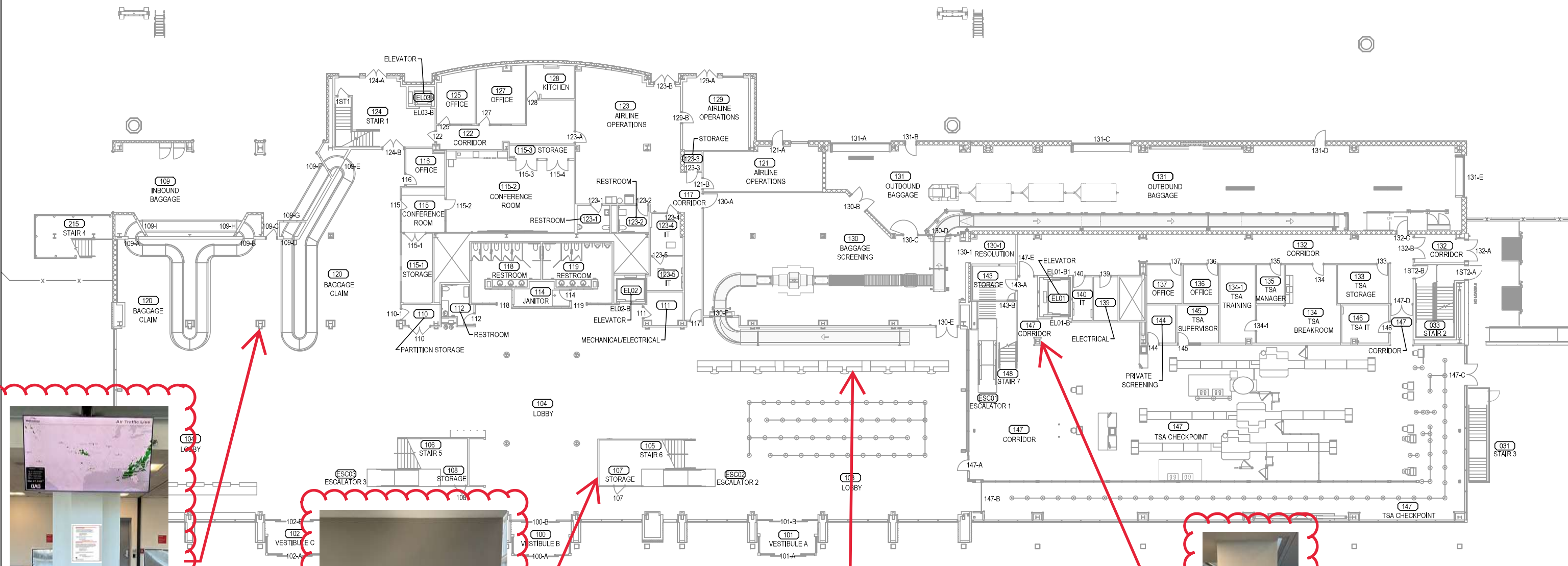
Coordinador: Alice Tejada
Teléfono: (618) 566-5321
Dirección: 9656 Air Terminal Dr., Mascoutah, IL 62258
TitleVI@flymidamerica.com



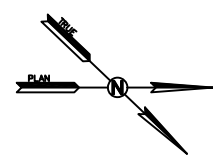
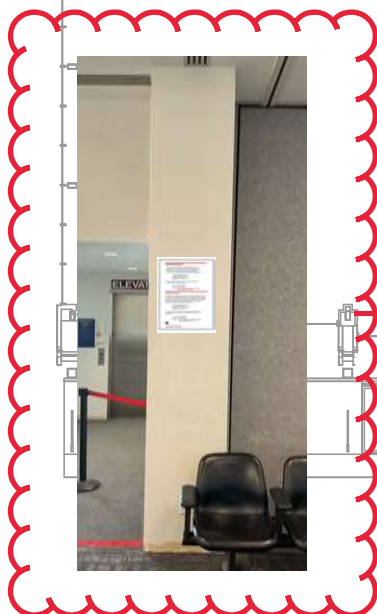
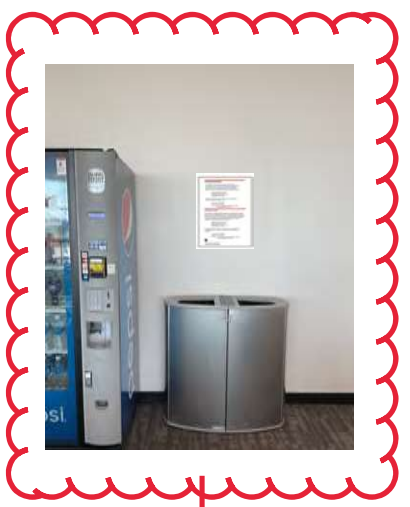
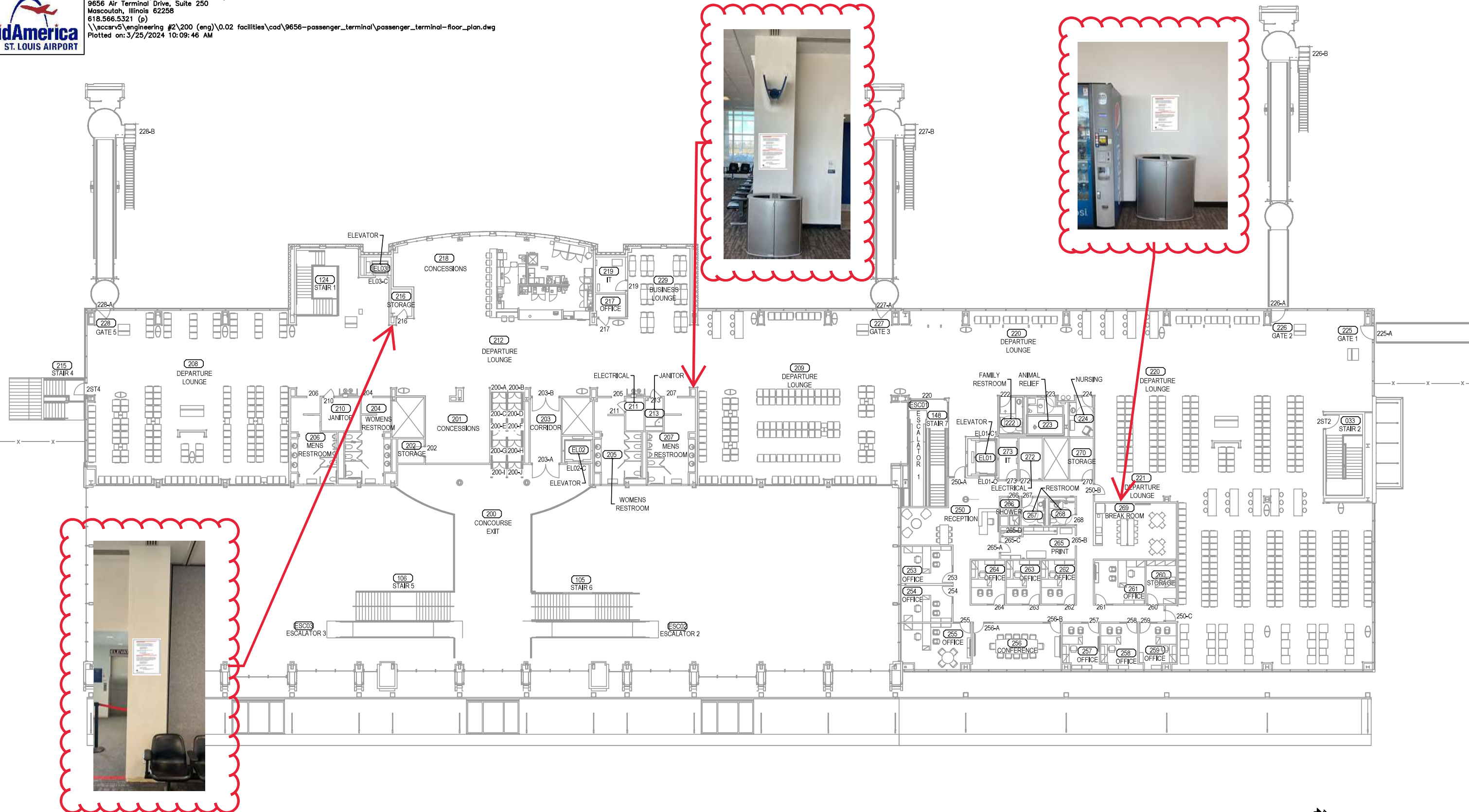
U.S. Department of Transportation
Federal Aviation Administration

HQ-101096

TITLE VI SIGNAGE PLACEMENT



1
1
MidAmerica Passenger Terminal
Level 1 - Floor Plan
NTS



ATTACHMENT A: Title VI Complaint Form



TITLE VI COMPLAINT FORM

These procedures are for complaints of discrimination, other than employment discrimination, by MidAmerica St. Louis Airport (BLV). They apply to discrimination by airport employees, contractors, concessionaires, lessees, or tenants of BLV’s facilities based upon race, creed, color, national origin, or sex, including but not necessarily limited to complaints under Title VI of the Civil Rights Act of 1964 and the Civil rights Restoration Act of 1987. They cover any program or activity administered by BLV.

Any person who feels that he or she has been subjected to discrimination on the basis of race, creed, color, national origin, or sex has the right to file a complaint with the Airport. These procedures do not deny or limit the right of a complainant to file a formal complaint with an outside agency, such as the U.S. Department of Transportation or Federal Aviation Administration (FAA), or to seek private legal counsel regarding discrimination.

Complaints must be filed within 180 days after the alleged discriminatory event, must be in writing, and must be delivered by one of the following:

Complete this form, print it, sign it, and mail, or email to:

By mail to: MidAmerica St. Louis Airport
Department of Engineering & Planning Attn: Title VI Coordinator
9656 Air Terminal Dr.
Mascoutah, IL 62258

OR by email to: BLV.TitleVI@flymidamerica.com

COMPLAINANT INFORMATION:

Date:
(MM/DD/YYYY) _____

Complainant Name: _____

Email Address: _____

Address: _____

City/State/Zip Code: _____

Phone
(include area code) _____ Cell Home Business

Second Phone
(Include area code) _____ Cell Home Business



I believe the discrimination I experienced was based on *(check all that apply):*

- Race Color National Origin Age
Sex Religion Disability Ancestry
Gender Identity Sexual Orientation Other

Airport Services, Program, Opportunity or Activity Allegedly in Violation

Date Alleged Violation occurred:

(MM/DD/YYYY) _____

Location:

(Be as specific as possible) _____

Description of Services Program, Opportunity or Activity used (if traveling, indicate Airline) *If more space is needed, please use the back of this form or attach a separate sheet of paper:*

Description of Alleged Violator (Airport, Tenant, Concessionaire, Contractor, Other)



Description of Alleged Violation and Requested Remedy:

**Include the name(s) and contact information of the person(s) who discriminated against you
(if known):**

Please list any and all witnesses' names, employers and contact information, if applicable.

Has this case been filed with the Department of Justice or other government agency or court?

