

Appendix 5: LEP Plan

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Appendix 5: LEP Plan

A. Introduction & Background

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d – 2000e) (Title VI), Executive Order 13166 – *Improving Access to Services for Persons with Limited English Proficiency*, and U.S. Department of Transportation (DOT) guidance – *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons*, govern East-West Gateway Council of Governments’ (EWGCOG) plan regarding LEP persons (LEP Plan). Under federal law, individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered to be LEP.¹ This language barrier may prevent individuals from accessing services and benefits and these individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. As a federal-aid recipient, EWGCOG is responsible for ensuring that its LEP constituents have meaningful access to EWGCOG’s programs and activities.

EWGCOG promotes a positive and cooperative understanding of the importance of providing language assistance so that LEP persons can have meaningful access to EWGCOG’s programs and activities. To this end, EWGCOG’s LEP Plan analyzes the most recent data available regarding the Region’s LEP population (see Part C – Four Factor Analysis). EWGCOG uses this data to develop the agency’s strategies for providing language assistance to LEP persons and how it will notify LEP persons of the availability of language assistance. The LEP Plan also describes how EWGCOG will monitor, evaluate, and update its LEP Plan and how the agency will train its staff with respect to the agency’s LEP Plan.

The results of EWGCOG’s Four Factor Analysis (see Part C) show, in part, that the Region has a very low, overall LEP population (at 2.3 percent) and that EWGCOG has infrequent contact with LEP persons. Based on the results of the Four Factor Analysis, EWGCOG has determined that it will provide language assistance services on a case-by-case or as-needed basis.

EWGCOG is prepared at all times to respond to each request for language assistance and to provide *reasonable* access to EWGCOG’s programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents. For more information about EWGCOG’s language assistance services please refer to Part D.

EWGCOG’s data analysis and LEP Plan is described in detail below. Full size version of the maps referenced in this LEP Plan can be found in Appendix 8 of the Title VI Program.

¹ The Federal Transit Administration also defines LEP persons as those who reported to the U.S. Census Bureau that they speak English less than very well, not well, or not at all (see FTA Circular 4702.1B, Chapter I, Part 5(l)). This definition is used by EWGCOG in its data analysis.

B. The Data

The data used in this LEP Plan is taken from the U.S. Census Bureau's (Census) 5-Year American Community Survey (ACS) for the period 2009 – 2013.² This is the most recent dataset available that includes all of the data that EWGCOG needed to conduct its analysis. The data that EWGCOG used in this LEP Plan include persons who speak English "less than very well," which includes those persons who indicated to the Census that they speak English "less than very well," "not well," or "not at all." This is consistent with the Federal Transit Administration's (FTA) definition of LEP persons.³

C. Four Factor Analysis

The first step EWGCOG's LEP Plan development is for EWGCOG to conduct a "Four Factor Analysis" that EWGCOG will use to determine whether it communicates effectively with LEP persons and will inform EWGCOG's language access planning. The Four Factor Analysis includes:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people's lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

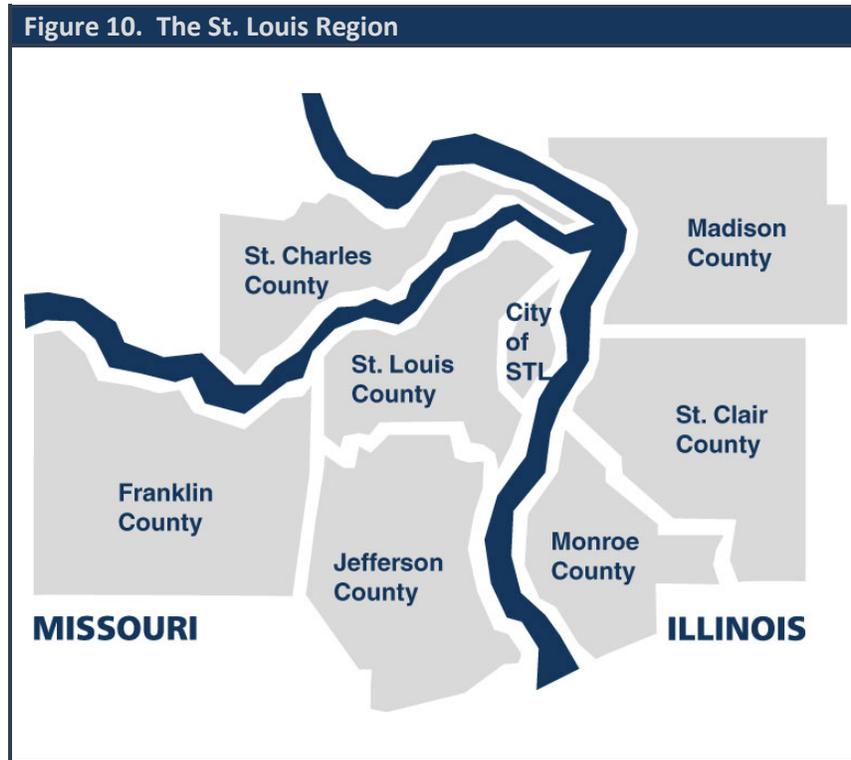
Each of the factors in this analysis is described in more detail below.

1. *Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*

This factor examines the persons eligible to be served or likely to be directly affected by EWGCOG's programs or activities. EWGCOG's service area is the Region (see Figure 10 below). As a planning agency, EWGCOG does not have daily interaction with LEP persons; rather, EWGCOG's interaction with LEP persons is limited to instances when the agency conducts a particular planning project for a community or neighborhood within the Region. Given this, EWGCOG's analysis focuses on identifying those areas within the Region that have highest concentrations of LEP persons. EWGCOG uses this data to identify LEP communities that may be part of EWGCOG's planning project service area so that EWGCOG can conduct appropriate outreach and provide any LEP persons living in these communities meaningful access to EWGCOG's planning efforts.

² More information about the ACS can be found on the Census' website at: www.census.gov/programs-surveys/acs/about.html.

³ See the Census Bureau's website at: www.census.gov/topics/population/language-use/about.html to learn more about the languages and language groups.



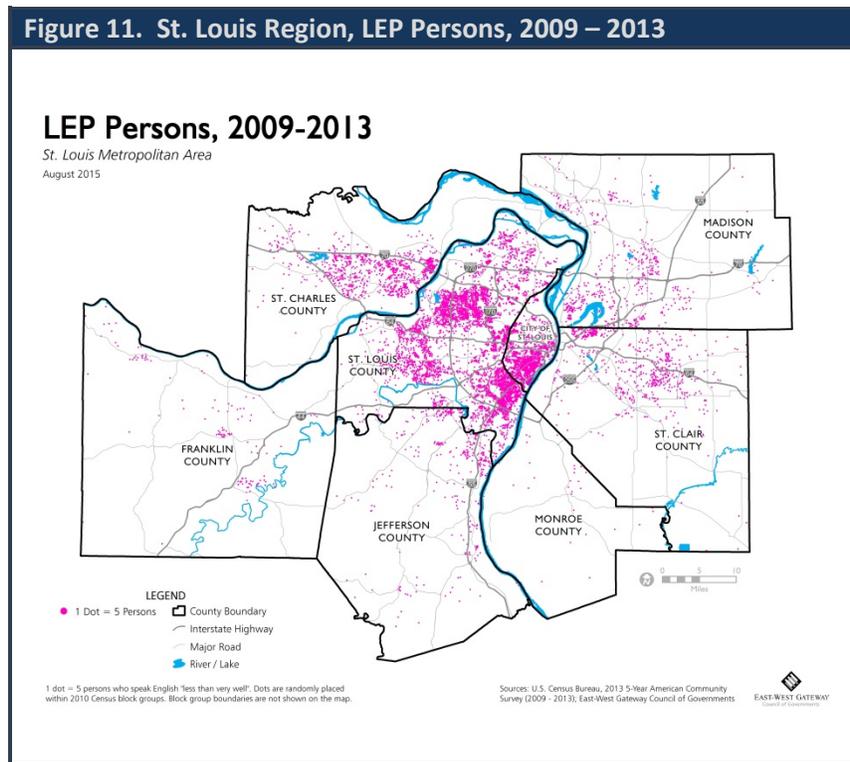
Based on EWGCOG’s analysis, the Region has very few LEP persons (56,098 persons or 2.3 percent of the Region’s total population) and households (13,221 households or 1.3 percent of the Region’s total household). Most LEP persons live in the City of St. Louis (12,885 persons) or St. Louis County (28,989 persons). Table 9 summarizes the data for LEP persons and households. Figure 11 shows the spatial distribution of LEP persons in the Region.

Table 9. St. Louis Region Limited English Proficient (LEP) Persons & Households¹

		Total Persons		LEP Persons		Total Households		LEP Households	
		#	%	#	%	#	%	#	%
St. Louis Region		2,414,972		56,098	2.3	1,022,623		13,221	1.3
ILLINOIS	Madison County	252,221		2,645	1.0	107,238		540	0.5
	Monroe County	31,272		152	0.5	12,506		53	0.4
	St. Clair County	250,929		3,427	1.4	102,885		699	0.7
MISSOURI	City of St. Louis	297,679		12,885	4.3	140,652		3,420	2.4
	Franklin County	95,243		626	0.7	39,263		83	0.2
	Jefferson County	205,031		1,902	0.9	80,812		374	0.5
	St. Charles County	341,309		5,472	1.6	135,974		955	0.7
	St. Louis County	941,288		28,989	3.1	403,293		7,097	1.8

Source: U.S. Census 2013 5-Year American Community Survey.

¹ An LEP person includes an individual who reported to the U.S. Census that they do not speak English "very well." This includes those persons who speak English "well," "not well," or "not at all." An LEP household is defined as a household in which no one in the household aged 14 years and older speaks English "very well."



Although EWGCOG’s interaction with LEP persons is very limited,⁴ EWGCOG’s analysis shows that, if the agency were to have contact with LEP persons, those persons are most likely to speak Spanish. When examining the Region’s 56,098 LEP persons, approximately 30.7 percent or a total of 17,201 persons speak Spanish (see Table 11).⁵ The next two most common languages spoken by LEP persons are Serbo-Croatian (Bosnian) and Chinese. Bosnian speaking LEP persons represent approximately 10.6 percent of all LEP persons; with a total of 5,962 persons. Chinese speaking LEP persons are the third most prevalent LEP language group, with 9.7 percent of all LEP persons or 5,459 total persons.

Table 10. Top 3 Languages Spoken by LEP Persons in the St. Louis Region

Total LEP Persons	Spanish		Serbo-Croatian (Bosnian)		Chinese	
	#	%	#	%	#	%
56,098	17,201	30.7	5,962	10.6	5,459	9.7

Source: U.S. Census 2013 5-Year American Community Survey.

⁴ Since 2011, EWGCOG has not had contact with any LEP persons.

⁵ In 2011, the top three languages spoken by the Region’s LEP residents were also Spanish, Bosnian, and Chinese; however, since the data was last examined, the number of LEP persons speaking these languages changed, as follows: Spanish speaking LEP persons decreased by 8.0 percent, Bosnian speaking LEP persons decreased by 10.0 percent, and Chinese speaking LEP persons increased by 18.7 percent. Despite these changes, the number of LEP residents in EWGCOG’s service area remains very low and Spanish still represents the most prevalent language spoken by the Region’s LEP residents.

Appendix 5: LEP Plan

As shown in Table 11, each county within EWGCOG’s service area has at least some Spanish speaking LEP persons, while Bosnian speaking and Chinese speaking LEP residents are largely concentrated in a few locations. For example, the City of St. Louis and St. Louis County have the highest proportion of the Region’s Bosnian speaking LEP persons and the highest proportion of the Region’s Chinese speaking LEP persons. Although these three language groups represent the largest number of LEP residents, all of these groups make up a very low proportion of the Region’s total population – 0.7 percent for Spanish speaking LEP persons and 0.2 percent for both Bosnian speaking and Chinese speaking LEP persons (see Table 12). Figures 12 and 13 show the concentration of all LEP populations in the City of St. Louis and St. Louis County.

Table 11. Proportion of Spanish, Bosnian & Chinese Speaking LEP Populations by County

	LEP Persons																
	Region	ILLINOIS						MISSOURI									
		Madison County		Monroe County		St. Clair County		City of St. Louis		Franklin County		Jefferson County		St. Charles County		St. Louis County	
#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
Spanish	17,201	1,359	7.9	75	0.4	1,959	11.4	3,776	22.0	340	2.0	547	3.2	2,131	12.4	7,014	40.8
Serbo-Croatian (Bosnian)	5,962	0	0.0	0	0.0	9	0.2	1,334	22.4	0	0.0	342	5.7	114	1.9	4,163	69.8
Chinese	5,459	85	1.6	0	0.0	71	1.3	816	14.9	179	3.3	35	0.6	341	6.2	3,932	72.0

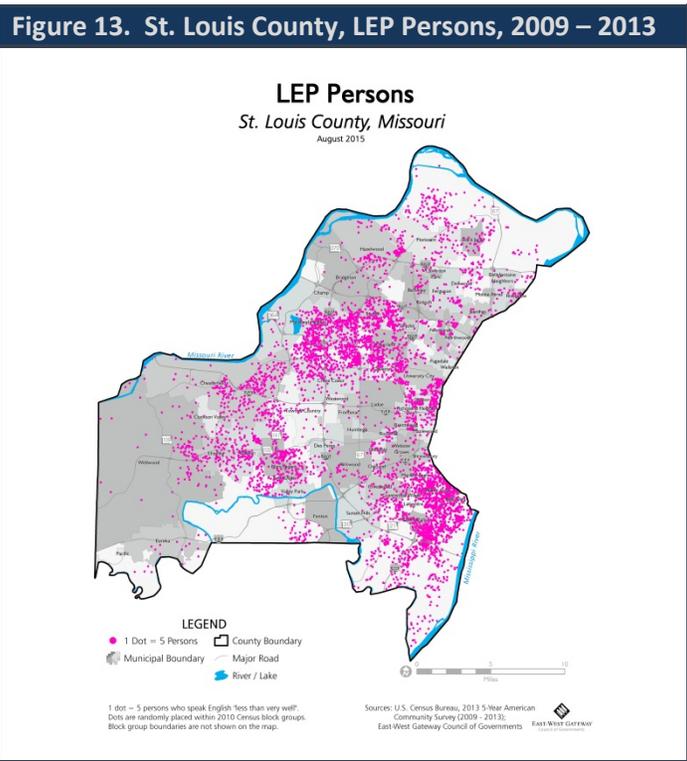
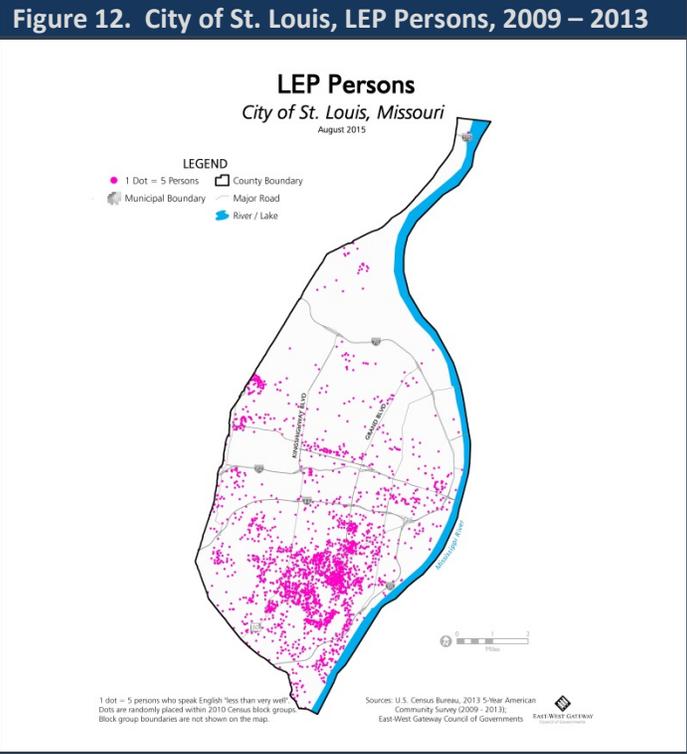
Source: U.S. Census 2013 5-Year American Community Survey.

Table 12. LEP Persons in the St. Louis Region by Language Spoken

	Total Persons	Language Groups ¹												Total LEP		
		Spanish		Other Indo-European Languages				Asian & Pacific Island Languages				Other Languages				
				Serbo-Croatian (Bosnian)		Other		Chinese		Other						
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	
St. Louis Region	2,414,972	17,201	0.7	5,962	0.2	11,928	0.5	5,459	0.2	11,131	0.5	4,417	0.2	56,098	2.3	
ILLINOIS	Madison County	252,221	1,359	0.5	0	0.0	682	0.3	85	0.0	365	0.1	154	0.1	2,645	1.0
	Monroe County	31,272	75	0.2	0	0.0	77	0.2	0	0.0	0	0.0	0	0.0	152	0.5
	St. Clair County	250,929	1,959	0.8	9	0.0	375	0.1	71	0.0	847	0.3	166	0.1	3,427	1.4
MISSOURI	City of St. Louis	297,679	3,776	1.3	1,334	0.4	2,399	0.8	816	0.3	2,656	0.9	1,904	0.6	12,885	4.3
	Franklin County	95,243	340	0.4	0	0.0	91	0.1	179	0.2	16	0.0	0	0.0	626	0.7
	Jefferson County	205,031	547	0.3	342	0.2	431	0.2	35	0.0	460	0.2	87	0.0	1,902	0.9
	St. Charles County	341,309	2,131	0.6	114	0.0	1,243	0.4	341	0.1	1,274	0.4	369	0.1	5,472	1.6
	St. Louis County	941,288	7,014	0.7	4,163	0.4	6,630	0.7	3,932	0.4	5,513	0.6	1,737	0.2	28,989	3.1

Source: U.S. Census 2013 5-Year American Community Survey.

¹ Language groups are defined by the U.S. Census. The numbers in the table reflect a combination of all the individual languages that make-up each of the four language groups (Spanish, Other Indo-European, Asian and Pacific, and Other). The definition of the languages and language groups can be found on the Census' website at: <https://www.census.gov/hhes/socdemo/language/about/>.



Appendix 5: LEP Plan

2. *Factor 2: The frequency with which LEP persons come into contact with the program.*

Factor 2 of the Four Factor Analysis requires EWGCOG to review its key program areas and assess major points of contact with the public. Due to the low proportion of LEP persons in the Region, EWGCOG does not have frequent contact with LEP persons. To-date EWGCOG has not had any contact with LEP persons – EWGCOG has not ever received a request for language assistance services from an LEP individual or had an LEP person attend any public meeting for EWGCOG’s programs (i.e. open houses for the Transportation Improvement Program). EWGCOG does not provide any services to the public directly, such as bus or rail service; however, as part of its planning processes EWGCOG does conduct public outreach. It is through its planning and outreach that EWGCOG has the greatest likelihood of encountering LEP persons.

Although EWGCOG does not typically have frequent contact with LEP populations, EWGCOG recognizes that there are communities in the Region that have high concentrations of LEP persons and that, if EWGCOG undertakes a project in these communities, EWGCOG may have an occasion to have more frequent contact with LEP persons. As part of its project planning process, EWGCOG analyzes the community-level data to identify these LEP populations and take steps to include LEP persons in the project. EWGCOG has developed a database of over 300 organizations in the Region that work with LEP persons and other underserved populations (i.e. minority groups, persons with disabilities, etc.).⁶ EWGCOG utilizes this list to conduct public outreach by sending these groups notifications about public meetings and other information about EWGCOG’s projects.

3. *Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.*

This factor is concerned with whether a federal-aid recipient’s programs, activities, or services are vitally important to the recipient’s constituents or have wide-spread impacts. EWGCOG is the metropolitan planning organization (MPO) for the Region. As described in Section V of the Title VI Program, EWGCOG’s federal mandate is to conduct and support cooperative and comprehensive transportation planning for the Region and develop certain documents and plans that govern transportation investments for the Region. EWGCOG’s planning processes are focused on the Region’s transportation network which facilitates the movement of people and products. The health and vitality of the Region and its residents depends on how well this transportation network functions. All of the Region’s residents, including its LEP population, rely on the network to get to work, hospitals, schools, and other essential places. EWGCOG recognizes that it is important for all constituents to have meaningful access to the planning process that ultimately affects the transportation network. If *all* of the Region’s residents do not have an opportunity to express their needs, the network could fail to meet their needs which could hinder their quality of life.

EWGCOG must ensure that all segments of the Region’s population, including LEP persons, have the opportunity to be involved in the planning process. EWGCOG works diligently to ensure that it evaluates the impact of proposed transportation investments on underserved and underrepresented groups (i.e. low-income persons, minority groups, and LEP persons) in order to prevent these groups from being overlooked during the planning process. EWGCOG is committed to ensuring that the agency’s planning

⁶ This list includes a wide variety of organizations such as the Metropolitan St. Louis Equal Housing Opportunity Council, the Urban League, and the Diversity Awareness Partnership.

Appendix 5: LEP Plan

projects and activities are accessible to all of the Region’s residents; therefore, through its planning processes, EWGCOG takes all appropriate and reasonable measures to reach the LEP community.

4. *Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

Under the 4th factor in the analysis, EWGCOG must examine the resources that it has available to provide meaningful access to LEP persons and the likely cost that EWGCOG will incur for providing language assistance services to LEP persons. Language assistance services include oral interpretation either in person or via telephone and written translation of significant documents. Under federal requirements, federal-aid recipients are expected to take reasonable steps to provide language assistance services to its LEP constituents. Notably, reasonable steps do not require a recipient to expend resources for language assistance services if the cost imposed substantially exceed the benefits.

In a typical year, EWGCOG budgets \$15,000 - \$20,000 to produce significant agency documents (in English). These significant documents include: the Transportation Improvement Program (TIP) along with the Air Quality Conformity Determination and the Unified Planning Work Program (UPWP). EWGCOG has other significant documents that are not produced or updated every year, such as the Long Range Transportation Plan (LRTP), *Where We Stand*, and the Coordinated Human Services Transportation Plan (CHSTP). EWGCOG’s significant documents are very lengthy and the cost to provide written translation of these documents is summarized in Table 13 below. Additionally, EWGCOG conducts public outreach with respect to the planning process associated with the LRTP, TIP, and other projects. The cost to provide oral interpretation services at public outreach events is summarized in Table 14 below. The total cost to EWGCOG for providing this type of outreach as a regular or automatic service exceeds EWGCOG’s available budget.

Table 13. Average¹ Cost of Written Translation of Significant Agency Documents

	Est. # of Words ²	Avg. Cost Per Word	Total Cost
TIP	56,400	\$0.18	\$10,152.00
Air Quality Conformity	31,800	\$0.18	\$5,724.00
UPWP	23,090	\$0.18	\$4,156.20
<i>Subtotal</i>			<i>\$20,032.20</i>
LRTP	45,000	\$0.18	\$8,100.00
<i>Where We Stand</i>	49,800	\$0.18	\$8,964.00
CHSTP	29,000	\$0.18	\$5,220.00
Total Costs			\$42,316.20

¹ Written translation services are charged by the word and the price can range from \$.17 - \$.19 per word, depending on the organization providing the service (see Table 14 for a list of service providers). EWGCOG used an average of the per word cost, which is \$.18. The costs above do not include the cost of having the translated documents formatted or edited, which would cost between \$33 and \$38 / hour. The number of pages required reflect an estimate of the pages in each document based on the most current version of the document's page number. *The number of pages will vary from year-to-year based upon actual content.*

² The number of words for the TIP, Air Quality Conformity, and *Where We Stand* were adjusted downward in order to account for the volume of the words that are numbers, so would not have to be translated. For example, EWGCOG estimated that at least 40% of the TIP document is numbers and would not have to be translated.

Appendix 5: LEP Plan

Table 14. Average¹ Cost of Oral Interpretation at Public Meetings

	Est. # of Hours	Avg. Cost Per Hour	Total Cost
LRTP	8	\$60.29	\$482.29
TIP & Air Quality Conformity	11	\$60.29	\$663.14
Other	10	\$60.29	\$602.86
Total Costs			\$1,748.29

¹ In-person oral interpretation services are charged by the hour and the price can range from \$47 - \$75 per hour, depending on the organization providing the service and the language needed (see Table 15 for a list of service providers). EWGCOG used an average of the hourly cost, which is \$60.29/hour. The number of hours required reflect the total number of hours that EWGCOG staff typically spends at the public meetings for each event multiplied by the typical number of events EWGCOG holds for that project. For example, for the 2016 - 2019 TIP & Air Quality Conformity, EWGCOG held 5 open houses for 2 hours each and 1 on-line chat for 1 hour. *The hours spent at each meeting will vary from year-to-year.*

D. Language Assistance Services

A recipient is responsible for determining the right mix of language assistance services based upon what is reasonable and necessary for the recipient after consideration of the results from the Four Factor Analysis. EWGCOG's Four Factor analysis shows that the Region has a low, overall LEP population and that EWGCOG has infrequent contact with LEP persons; therefore, EWGCOG has determined that it will provide language assistance services on a case-by-case or as-needed basis. EWGCOG is prepared at all times to respond to each request for language assistance and to provide reasonable access to EWGCOG's programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents. Table 15 provides a list of organizations that can provide EWGCOG these services.

Although EWGCOG has determined that it is not reasonable and necessary to automatically provide written translation or oral interpretation of significant agency documents or oral interpretation at public outreach events, EWGCOG has decided that it will translate certain materials into Spanish. The data analysis shows that the Region's LEP persons are most likely to be Spanish-speaking and Spanish-speaking LEP persons reside in every county within EWGCOG's service area. The materials that EWGCOG will translate into Spanish include: (1) EWGCOG's brochures: "Commitment to Limited English Proficient (LEP) Persons" and "Your Rights Under Title VI," (2) the Title VI Complaint Procedures, (3) the Title VI Nondiscrimination Complaint Form, and (4) information about EWGCOG's provision of free language assistance services. Translating these documents is a low-cost way for EWGCOG to inform LEP persons about the protections afforded them under Title VI and provide LEP persons a way to request additional information or services. EWGCOG will also place a statement on its website that informs visitors that EWGCOG will provide language assistance services free of charge and upon request. This statement will be placed on EWGCOG's website in Spanish; however, additional languages will be added if, after an examination of the data, the proportion of other languages spoken by LEP persons in the Region changes to a level that indicates that translation into other languages is needed.

In addition, EWGCOG recognizes that the Region has certain areas with higher concentrations of LEP persons who may speak languages other than Spanish, so EWGCOG has determined that it will take

Appendix 5: LEP Plan

several low-cost or no-cost proactive steps to provide meaningful access to EWGCOG’s program, activities, and services to all LEP persons. These steps include:

- Utilizing bilingual EWGCOG staff on an as-needed basis to assist during public outreach efforts or other interactions with LEP persons.
- Seeking the assistance of organizations that provide translation and interpretation services. EWGCOG will use the State of Missouri Cooperative Procurement List to identify entities that provide these services.⁷
- Coordinating with other MPOs to share translated materials, such as informational notices.
- Working with local groups, citizens, and businesses that represent or work with LEP persons in order to identify appropriate strategies that EWGCOG can use to reach LEP persons, as well as provide opportunities for those who represent LEP interests to participate in regional decision making by serving on advisory groups and citizen panels.
- Continuing to monitor the demographic characteristics of the Region in order to identify changes in the LEP population that may necessitate a change to EWGCOG’s LEP Plan.

Table 15. Language Assistance Providers*

Telephone Foreign Language Interpretation (\$44 / hour, 2-hour minimum)	
Global Village St. Louis, MO globalvillagelanguagecenter.com/ (314) 989-9112	International Language Center St. Louis, MO www.ilcworldwide.com (800) 445-4440
Language Interpreter – Verbal (\$47 - \$81 / hour)	
International Language Center St. Louis, MO www.ilcworldwide.com (800) 445-4440	Bilingual International Assistant Services St. Louis, MO www.bilingualstl.org/ (314) 645-7800
International Institute of Metropolitan St. Louis St. Louis, MO www.iistl.org/iibsctranslation.html (314) 773-9090	
Language Translation – Written (\$.17 - \$.19 / word; \$33 - \$38 / hour for editing and formatting)	
International Language Center St. Louis, MO www.ilcworldwide.com (314) 647-8888	International Institute of Metropolitan St. Louis St. Louis, MO www.iistl.org/iibsctranslation.html (314) 773-9090
Global Village St. Louis, MO globalvillagelanguagecenter.com/ (314) 989-9112	Propio Language Services, LLC Overland Park, KS propio-ls.com/index.asp (888) 528-6692

*Costs are based on current contract rates at the time this list was developed and the prices may vary based upon the specific language that is the basis for the interpretation or translation service request.

⁷ The State of Missouri’s Cooperative Procurement List can be found on-line at: oa.mo.gov/purchasing/cooperative-procurement-services and oa.mo.gov/purchasing/bidding-contracts/awarded-bid-contract-document-search.

E. Monitoring, Evaluating & Updating the LEP Plan

EWGCOG consistently monitors its programs and projects to ensure that the needs of LEP persons are being considered during the planning process. The Title VI Coordinator has primary responsibility for monitoring staff and contractor compliance with the LEP Plan. Specifically, when projects are conducted at a sub-regional level (i.e. for a specific county, municipality, etc.), EWGCOG planning staff coordinates with EWGCOG research staff to obtain and evaluate data regarding the demographic composition of the affected community. Given that LEP persons are concentrated in certain areas within the Region, EWGCOG planning staff pays particular attention to this demographic characteristic. EWGCOG planning staff also works with the Title VI Coordinator to develop strategies for providing meaningful access to LEP persons, when appropriate. These strategies may include coordinating with existing organizations in the project area to determine the best ways to conduct outreach and engage LEP persons during the project, having interpreters available, or translating meeting notices, flyers, and agendas into other languages.

EWGCOG evaluates the data available on the number and proportion of LEP persons in the Region as often as needed when it conducts local projects. The data examined by EWGCOG includes U.S. Census Bureau data for the particular area affected (i.e. number of LEP persons and language spoken), as well as information gathered from local organizations that are familiar with the project area. EWGCOG analyzes the data to identify locations within the project area that have high concentrations of LEP persons and the language(s) spoken by the LEP residents. This analysis is used to keep staff informed about and cognizant of where these persons live so that staff is able to incorporate LEP persons into the planning process. EWGCOG also uses this data to evaluate the language assistance services it provides and to determine what methods need to be used to provide these services.

Additionally, every three years during the Title VI Program update, EWGCOG reviews the entire LEP Plan based on the data collected during the program period and determines what updates need to be made to the Plan. The data EWGCOG uses during this process includes: the most recent U.S. Census Bureau data and staff surveys that collect information regarding how many LEP persons staff has been in contact with and how the needs of LEP persons have been addressed.⁸ In the event that EWGCOG has contact with LEP persons, staff will also collect information from LEP persons served, such as:

- Was the local language assistance provided effective and sufficient to meet the person's needs?
- Were any complaints received? If so, what was the nature of the complaint?

Also, in conjunction with community partners, EWGCOG conducts a periodic assessment of LEP needs in the Region and the outreach strategies that EWGCOG can use to engage the LEP community.

F. Staff Training

Every three years the Title VI Coordinator with assistance of other staff persons conducts training to EWGCOG's planning, research, and support staff. This training includes:

- Information about EWGCOG's Title VI Program and the LEP Plan
- A description of the language assistance services offered to the public

⁸ To-date no LEP persons have contacted EWGCOG for language assistance or attended any of EWGCOG's outreach events.

Appendix 5: LEP Plan

- Instructions and information about how to handle a request for language assistance services and how to handle a potential LEP complaint (cultural competency)
- Information about what steps staff can take to understand the LEP community in the staff person's project area and the planning process for outreach to that community

Additionally, if a particular project will include a third-party contractor's services, EWGCOG informs the contractor about its Title VI and LEP obligations (see Appendix 1 for the language that is included in each federally-funded third-party contract).

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