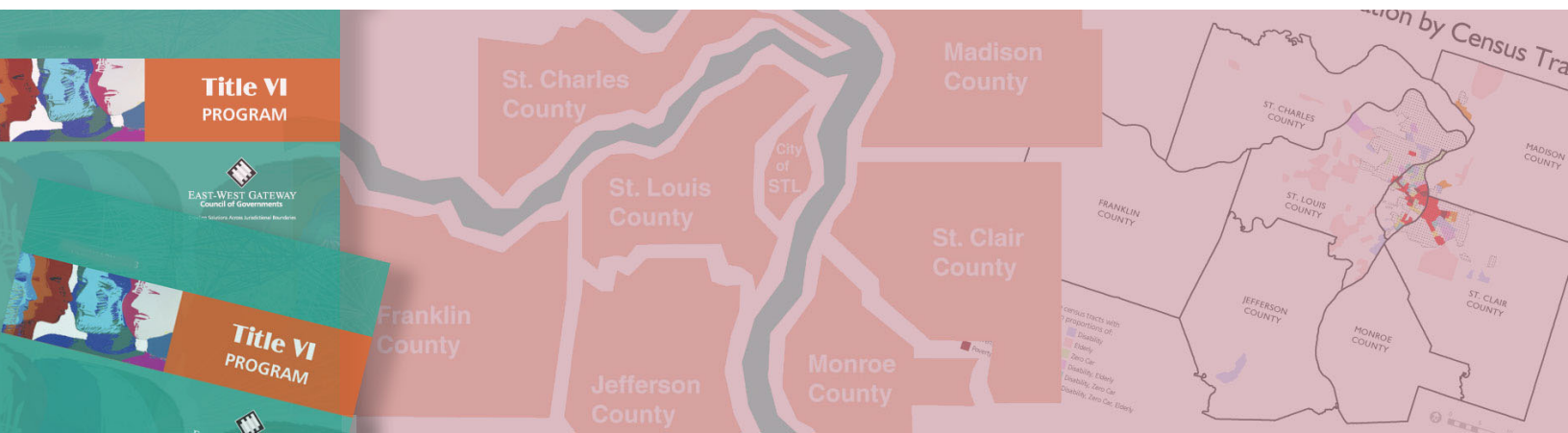




Appendix 5: LEP Plan



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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’ (EWG) 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, EWG is responsible for ensuring that its LEP constituents have meaningful access to EWG’s programs and activities.

EWG promotes a positive and cooperative understanding of the importance of providing language assistance so that LEP persons can have meaningful access to EWG’s programs and activities. To this end, EWG’s LEP Plan analyzes the most recent data available regarding the Region’s LEP population (see Part C – Four Factor Analysis). EWG 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 EWG 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 EWG’s Four Factor Analysis (see Part C) show, in part, that the Region has a very low, overall LEP population (at 2.2 percent) and that EWG has infrequent contact with LEP persons. Based on the results of the Four Factor Analysis, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis.

EWG is prepared at all times to respond to each request for language assistance and to provide *reasonable* access to EWG’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 EWG’s language assistance services please refer to Part D.

EWG’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 EWG in its data analysis.

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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 2015 – 2019.² This is the most recent dataset available that includes all of the data that EWG needed to conduct its analysis. The data that EWG 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 EWG's LEP Plan development is for EWG to conduct a “Four Factor Analysis” that EWG will use to determine whether it communicates effectively with LEP persons and will inform EWG'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 EWG's programs or activities. EWG's service area is the Region. As a planning agency, EWG does not have daily interaction with LEP persons; rather, EWG'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, EWG's analysis focuses on identifying those areas within the Region that have highest concentrations of LEP persons. EWG uses this data to identify LEP communities that may be part of EWG's

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.

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planning project service area so that EWG can conduct appropriate outreach and provide any LEP persons living in these communities meaningful access to EWG's planning efforts.

Based on EWG's analysis, the Region has very few LEP persons (55,247 persons or 2.3 percent of the Region's total population) and households (12,869 households or 1.2 percent of the Region's total households). Most LEP persons live in the city of St. Louis (10,726 persons) or St. Louis County (28,460 persons). Table 12 summarizes the data for LEP persons and households. Map 11 shows the spatial distribution of LEP persons in the Region.⁴

Table 12. St. Louis Region Limited English Proficient (LEP) Persons & Households¹

		Persons Over 5	LEP Persons Over 5		Total Household	LEP Household	LEP Household
		#	#	%	#	#	%
St. Louis Region		2,432,780	55,247	2.3	1,045,304	12,869	1.2
ILLINOIS	Madison County	249,469	2,899	1.2	107,659	440	0.4
	Monroe County	32,305	287	0.9	13,586	76	0.6
	St. Clair County	245,702	4,410	1.8	104,105	947	0.9
MISSOURI	City of St. Louis	288,501	10,726	3.7	141,952	3,318	2.3
	Franklin County	96,965	492	0.5	40,943	74	0.2
	Jefferson County	210,696	1,833	0.9	84,444	290	0.3
	St. Charles County	370,773	6,140	1.7	146,631	995	0.7
	St. Louis County	938,369	28,460	3.0	405,984	6,729	1.7

Source: U.S. Census 2019 5-Year American Community Survey, Tables B16004 and C16002

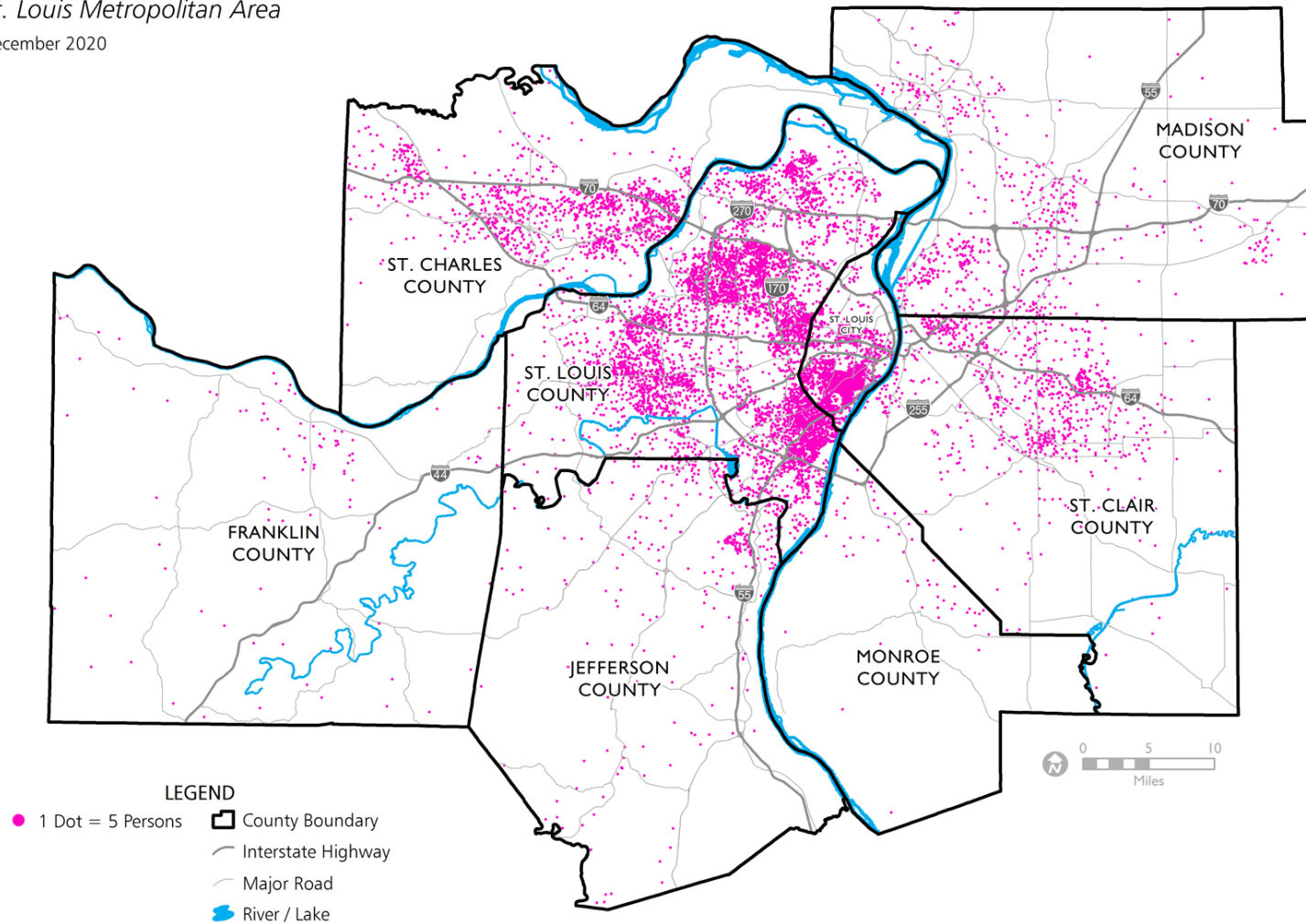
¹ An LEP person includes an individual who reported to the U.S. Census that they do not speak English "very well." This includes those persons who speak English "well," "not well," or "not at all." An LEP household is defined as a household in which no one in the household aged 14 years and older speaks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

⁴ County-level maps of LEP Persons for each of the eight counties in the Region can be found online at: www.ewgateway.org/titlevi.

LEP Persons, 2015-2019

St. Louis Metropolitan Area

December 2020



1 dot = 5 persons who speak English "less than very well". Dots are randomly placed within 2010 Census block groups. Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2019 5-Year American Community Survey (2015 - 2019); East-West Gateway Council of Governments



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Although EWG’s interaction with LEP persons is very limited,⁵ EWG’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 55,247 LEP persons, there are three language groups that are the most common: Spanish, Russian, Polish, or other Slavic (Slavic), and Chinese (which includes Cantonese and Mandarin). Spanish, Slavic, and Chinese language speakers make up more than half (58 percent) of the Region’s LEP population with more than 30,800 people. These three language groups are also the only groups that make up more than 10 percent of the total LEP population (see Table 13a).

Nearly a third (30.6 percent) of the LEP population speaks Spanish. This represents 16,913 individuals, and is by far the largest LEP group in the Region. The next most common languages spoken by LEP persons are those in the Russian, Polish, or other Slavic language group, of which a majority speak Bosnian or Serbo-Croatian. Slavic speaking LEP persons represent approximately 13 percent of all LEP persons; with a total of 7,255 persons.

Because of the importance of the Bosnian population to the Region, it is necessary to attempt to disaggregate the “Russian, Polish, or other Slavic languages” category reported by the Census into component parts. The Census changed the manner in which it reports data for this group between 2015 and the 2016 and 2019 surveys. In the 2015 data, the ACS reported separately on Russian and Serbo-Croatian, the latter of which is the most frequently spoken Slavic language in the Region. The 2019 ACS reports 7,255 individuals in the Slavic LEP category. EWG estimates that there are approximately 5,000 Serbo-Croatian speakers with limited English proficiency in the Region.

Speakers of the Mandarin or Cantonese Chinese languages make up the third largest category of the LEP population. The Census estimates that there are nearly 6,700 LEP speakers of Chinese languages in the Region, making up 12 percent of all LEP persons.

Although the Spanish, Slavic, and Chinese 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, 0.3 percent for speakers of Slavic languages, and 0.28 percent for Chinese speaking LEP persons (see Table 13b).

Bosnians in the St. Louis Region

A civil war in the former Yugoslav republic of Bosnia-Herzegovina between 1992 and 1995 resulted in approximately 7,000 Bosnians relocating to the Region. Today, it is estimated that there are about 50,000 Bosnians in the St. Louis area. Map 17 shows LEP persons who speak Slavic languages, of which the Bosnians make up a large majority. The Bosnian community is concentrated in the cluster of points spreading from south St. Louis City to adjacent south St. Louis County.

⁵ Since 2015, EWG has not had contact with any LEP persons.

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Table 13a shows 12 languages and language groups for which the ACS provides data. In the Region, nearly a third (30.6 percent) of the LEP population speaks Spanish. Slavic speaking LEP persons represent approximately 13 percent of all LEP persons. Approximately 12 percent of the Region's LEP population speaks Chinese languages.

Table 13a: Language Spoken by LEP Population by Language by County

		Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo- European languages	Vietnamese	Other Asian and Pacific Island languages	Other and unspecified languages	Arabic	Tagalog (incl. Filipino)	Korean	French, Haitian or Cajun	German or other West Germanic languages
St. Louis Region		16,913	7,255	6,703	5,851	4,604	3,427	2,669	2,508	1,431	1,408	1,314	1,164
ILLINOIS	Madison County	1,504	126	363	243	69	109	71	114	64	51	91	94
	Monroe County	112	4	58	0	89	13	0	0	0	0	11	0
	St. Clair County	2,231	123	187	203	340	222	79	111	114	174	291	335
MISSOURI	City of St. Louis	3,295	786	778	1,276	1,610	613	1,248	607	172	134	185	22
	Franklin County	172	4	0	58	125	0	25	0	0	0	4	104
	Jefferson County	609	487	23	139	254	15	44	52	116	12	11	71
	St. Charles County	2,751	320	677	636	456	512	126	61	116	208	118	159
	St. Louis County	6,239	5,405	4,617	3,296	1,661	1,943	1,076	1,563	849	829	603	379
Percent of Regional LEP		30.6	13.1	12.1	10.6	8.3	6.2	4.8	4.5	2.6	2.5	2.4	2.1

Source: US Census, 2019 5 Year American Community Survey

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Table 13b shows the percentage of the Region's population represented by the LEP population's different language groups. Spanish speakers with LEP represent 0.70 percent of the Region's population over the age of five. In the city of St. Louis, this group is more than one percent of the total population. In no other county does this group exceed one percent of the population. LEP speakers of Slavic languages all together comprise 0.30 percent of the Region's population. In the city of St. Louis, the Slavic LEP population makes up just over one quarter of one percent of the population while, in St. Louis County, the Slavic LEP population makes up over on half of one percent of the population. In no other county in the Region does this population exceed a quarter of one percent.

Table 13b. Percent of Population Over Age 5 that is LEP, by Language by County

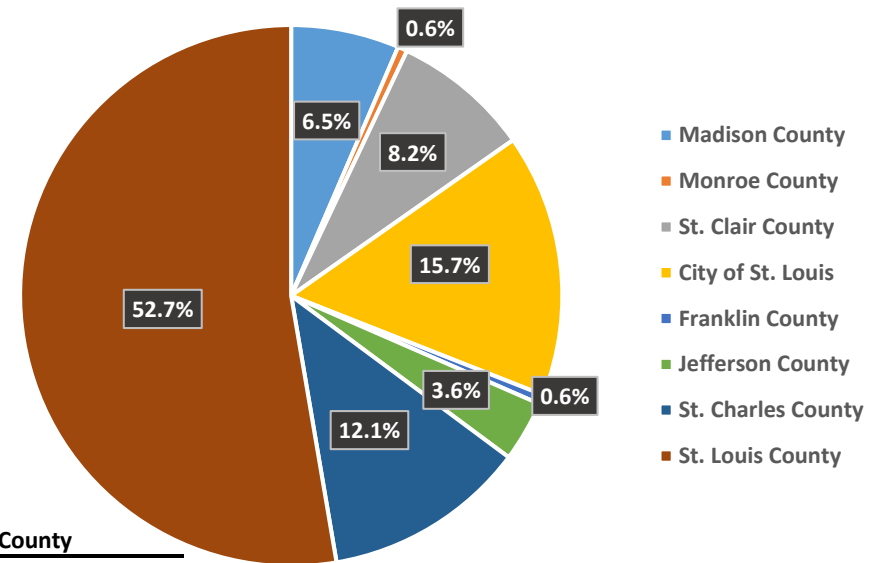
		Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo- European languages	Vietnamese	Other Asian and Pacific Island languages	Other and unspecified languages	Arabic	Tagalog (incl. Filipino)	Korean	French, Haitian or Cajun	German or other West Germanic languages
St. Louis Region		0.70	0.30	0.28	0.24	0.19	0.14	0.11	0.10	0.06	0.06	0.05	0.05
ILLINOIS	Madison County	0.60	0.05	0.15	0.10	0.03	0.04	0.03	0.05	0.03	0.02	0.04	0.04
	Monroe County	0.35	0.01	0.18	0.00	0.28	0.04	0.00	0.00	0.00	0.00	0.03	0.00
	St. Clair County	0.91	0.05	0.08	0.08	0.14	0.09	0.03	0.05	0.05	0.07	0.12	0.14
MISSOURI	City of St. Louis	1.14	0.27	0.27	0.44	0.56	0.21	0.43	0.21	0.06	0.05	0.06	0.01
	Franklin County	0.18	0.00	0.00	0.06	0.13	0.00	0.03	0.00	0.00	0.00	0.00	0.11
	Jefferson County	0.29	0.23	0.01	0.07	0.12	0.01	0.02	0.02	0.06	0.01	0.01	0.03
	St. Charles County	0.74	0.09	0.18	0.17	0.12	0.14	0.03	0.02	0.03	0.06	0.03	0.04
	St. Louis County	0.66	0.58	0.49	0.35	0.18	0.21	0.11	0.17	0.09	0.09	0.06	0.04

Source: US Census, 2019 5 Year American Community Survey

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While the LEP persons who speak languages in the top three language groups are generally dispersed across the Region, the highest proportion of these LEP populations reside in the city of St. Louis, St. Charles County, and St. Louis County. St. Louis County has the largest proportion of Spanish, Slavic, and Chinese speaking LEP persons, at almost 53 percent or 16,261 persons. The city of St. Louis has the next highest proportion with more than 15 percent of LEP persons falling within these groups (4,859 persons). As shown in Table 14, each county within EWG's service area has at least some Spanish speaking LEP persons, while Slavic 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 Slavic speaking LEP persons, at 10.8 percent and 74.5 percent, respectively, and the highest proportion of the Region's Chinese speaking LEP persons at 11.6 percent and 69 percent, respectively.

Chart 2. Proportion of LEP Population, Top 3 Language Groups by County



Source: U.S. Census 2019 5-Year American Community Survey.

Table 14. Proportion of Spanish, Slavic Languages & Chinese Speaking LEP Populations by County

		Spanish		Russian, Polish, or other Slavic Languages		Chinese (incl. Mandarin, Cantonese)		Total	
		#	%	#	%	#	%	#	%
St. Louis Region		16,913	100.0	7,255	100.0	6,703	100.0	30,871	100.0
ILLINOIS	Madison County	1,504	8.9	126	1.7	363	5.4	1,993	6.5
	Monroe County	112	0.7	4	0.1	58	0.9	174	0.6
	St. Clair County	2,231	13.2	123	1.7	187	2.8	2,541	8.2
	City of St. Louis	3,295	19.5	786	10.8	778	11.6	4,859	15.7
	Franklin County	172	1.0	4	0.1	0	0.0	176	0.6
	Jefferson County	609	3.6	487	6.7	23	0.3	1,119	3.6
	St. Charles County	2,751	16.3	320	4.4	677	10.1	3,748	12.1
	St. Louis County	6,239	36.9	5,405	74.5	4,617	68.9	16,261	52.7

Source: US Census, 2019 5 Year American Community Survey

Appendix 5: LEP Plan, Map 16 – St. Louis Region, LEP Persons, Spanish Language Speakers, 2015-2019

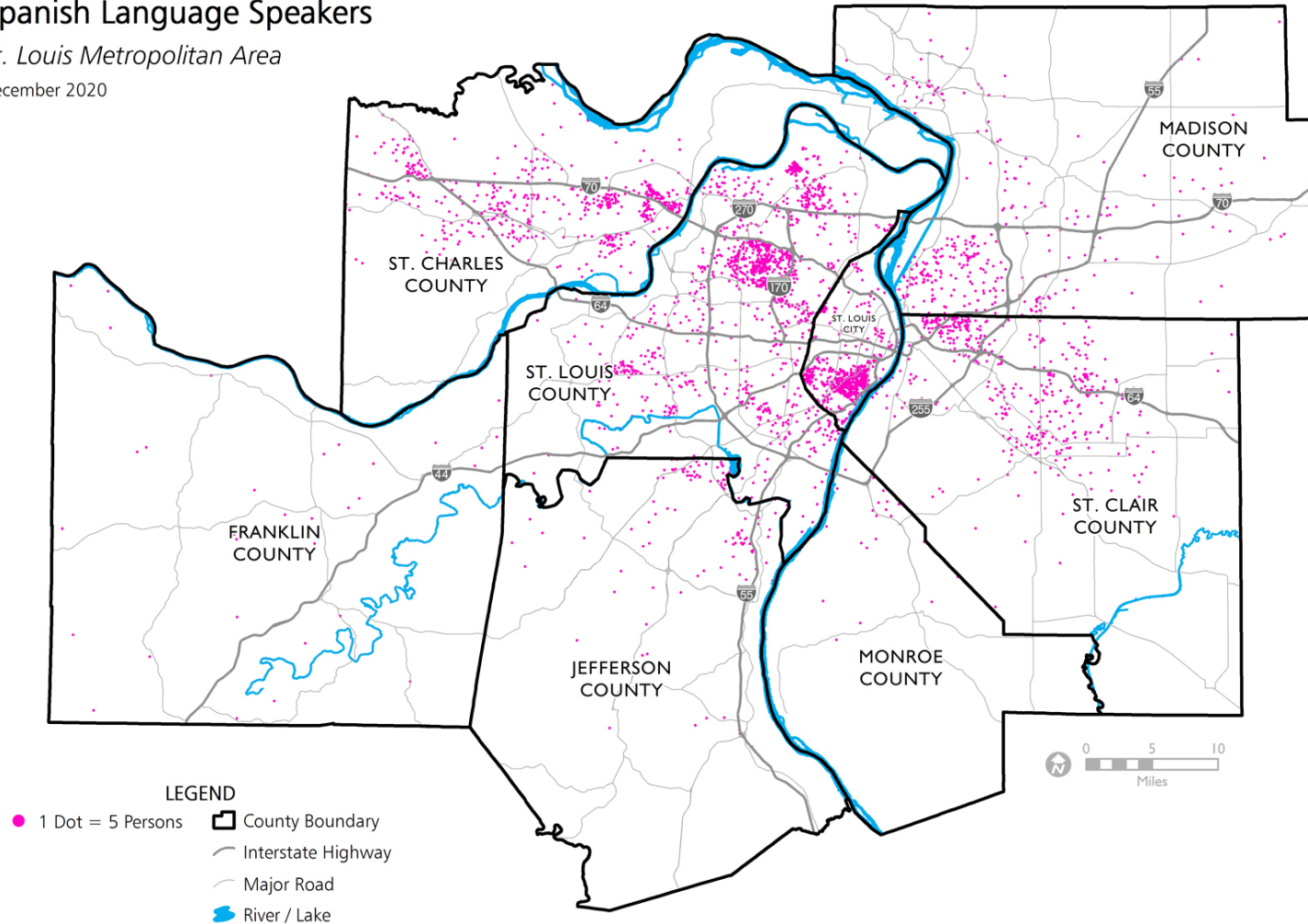
Maps 16 through 18 show the spatial distribution of Spanish speaking, Slavic speaking, and Chinese speaking LEP persons in the Region.

LEP Persons, 2015-2019

Spanish Language Speakers

St. Louis Metropolitan Area

December 2020



1 dot = 5 Spanish speakers who speak English "less than very well". Dots are randomly placed within 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2019 5-Year American Community Survey (2015 - 2019); East-West Gateway Council of Governments

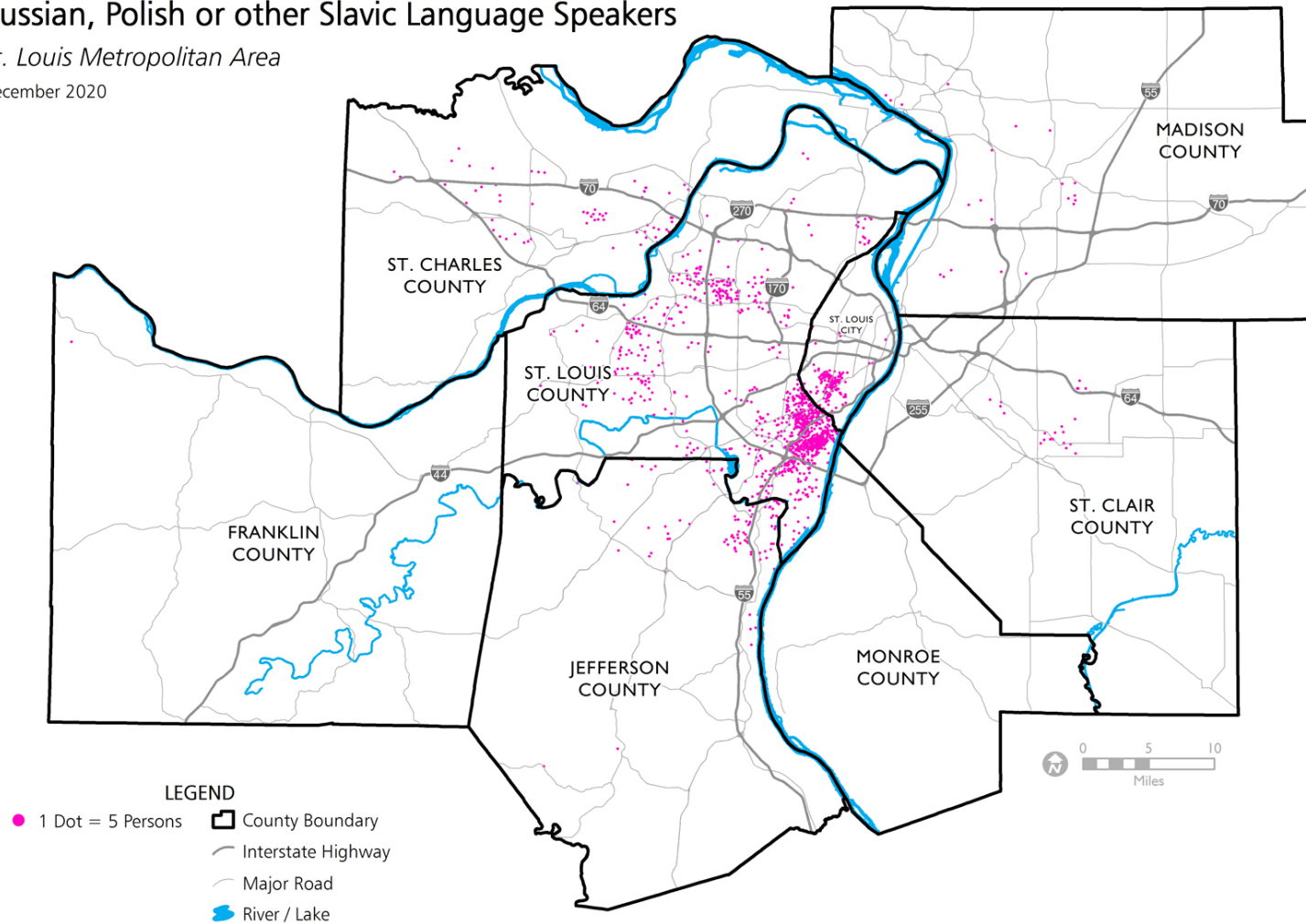


LEP Persons, 2015-2019

Russian, Polish or other Slavic Language Speakers

St. Louis Metropolitan Area

December 2020



1 dot = 5 Russian, Polish or other Slavic language speakers who speak English "less than very well". Dots are randomly placed within 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2019 5-Year American Community Survey (2015 - 2019); East-West Gateway Council of Governments

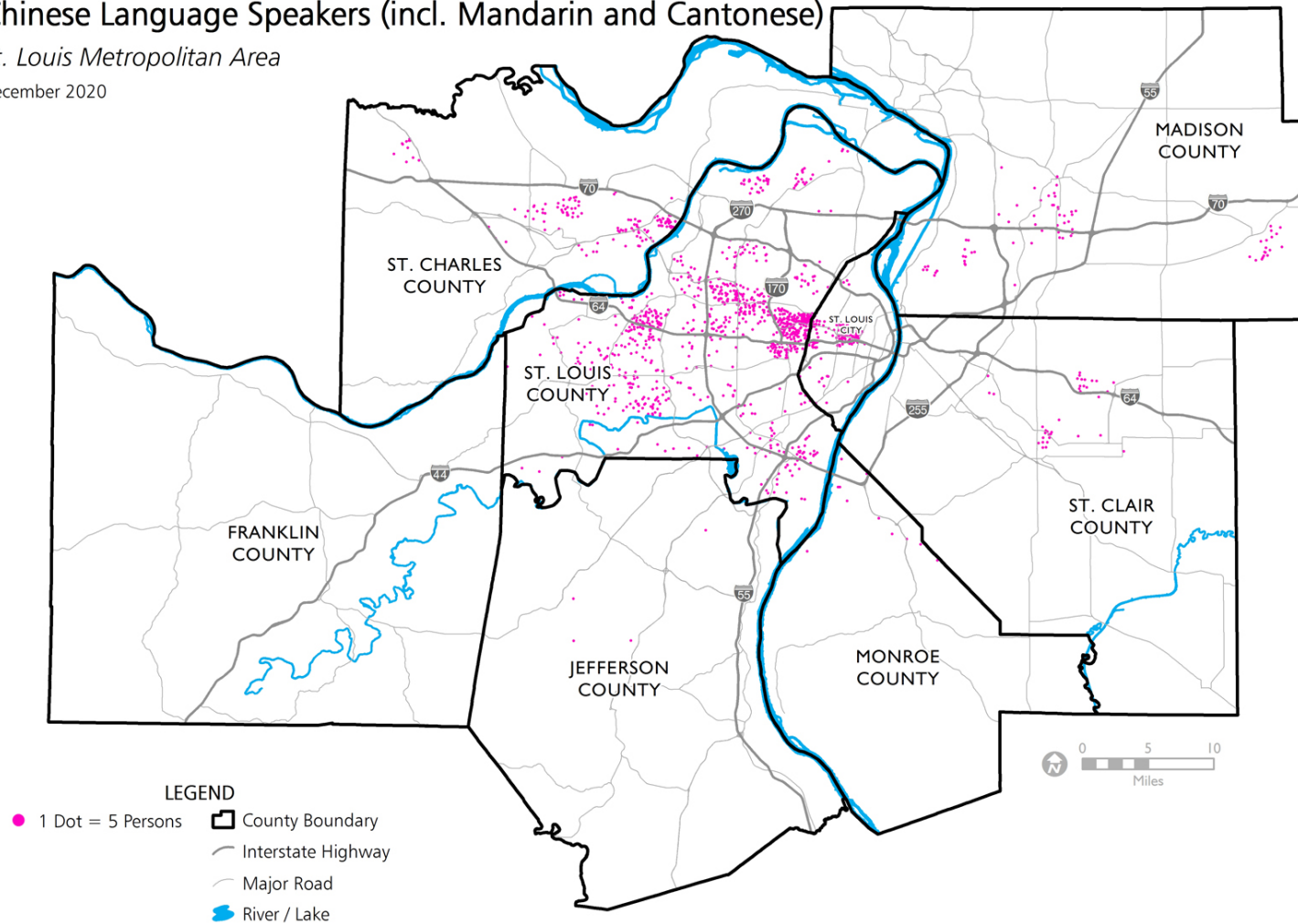


LEP Persons, 2015-2019

Chinese Language Speakers (incl. Mandarin and Cantonese)

St. Louis Metropolitan Area

December 2020



1 dot = 5 Chinese (incl. Mandarin, Cantonese) language speakers who speak English "less than very well". Dots are randomly placed within 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2019 5-Year American Community Survey (2015 - 2019); East-West Gateway Council of Governments



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

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

Although EWG does not typically have frequent contact with LEP populations, EWG recognizes that there are communities in the Region that have high concentrations of LEP persons and that, if EWG undertakes a project in these communities, EWG may have an occasion to have more frequent contact with LEP persons. As part of its project planning process, EWG analyzes the community-level data to identify these LEP populations and take steps to include LEP persons in the project. EWG 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 EWG utilizes this list to conduct public outreach by sending these groups notifications about public meetings and other information about EWG’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. EWG is the metropolitan planning organization (MPO) for the Region. As described in Section V of the Title VI Program, EWG’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. EWG’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. EWG 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.

EWG must ensure that all segments of the Region’s population, including LEP persons, have the opportunity to be involved in the planning process. EWG 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. EWG 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.

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projects and activities are accessible to all of the Region's residents; therefore, through its planning processes, EWG 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, EWG must examine the resources that it has available to provide meaningful access to LEP persons and the likely cost that EWG 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, EWG 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). EWG 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). EWG's significant documents are very lengthy and the cost to provide written translation of these documents is summarized in Table 15 below. Additionally, EWG 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 16 below. The total cost to EWG for providing this type of outreach as a regular or automatic service exceeds EWG's available budget.

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Table 15. Average¹ Cost of Written Translation of Significant Agency Documents

	Est. # of Words ²	Avg. Cost Per Word	Total Cost
TIP	22,000	\$0.14	\$3,080.00
Air Quality Conformity	52,950	\$0.14	\$7,413.00
UPWP	26,000	\$0.14	\$3,640.00
L RTP	86,500	\$0.14	\$12,110.00
Where We Stand	49,000	\$0.14	\$6,860.00
CHSTP	14,500	\$0.14	\$2,030.00
Hazard Mitigation Plan	85,000	\$0.14	\$11,900.00
Total Costs			\$47,033.00

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # CS201593.

¹ Written translation services are charged by the word and the price can range from \$.11 - \$.18 per word, depending on the organization providing the service (see Table 17 for a list of service providers). EWG used an average of the per word cost, which is \$.14. The costs above do not include the cost of having the translated documents formatted or edited, which would cost, on average, \$25.82 / hour. *The number of words will vary from year-to-year based upon actual content.*

² The estimated number of words for the TIP, Air Quality Conformity, UPWP and Where We Stand do not include numbers that would not need to be translated.

Table 16. Average¹ Cost of Oral Interpretation at Public Meetings

	Est. # of Hours	Avg. Cost Per Hour	Total Cost
L RTP	8	\$49.58	\$396.64
TIP & Air Quality Conformity	11	\$49.58	\$545.38
Other	10	\$49.58	\$495.80
Total Costs			\$1,437.82

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # CS182066.

¹ In-person oral interpretation services are charged by the hour and the price can range from \$39 - \$65 per hour, depending on the organization providing the service and the language needed (see Table 17 for a list of service providers). EWG used an average of the hourly cost for the Region. The number of hours required reflect the total number of hours that EWG staff typically spends at the public meetings for each event multiplied by the typical number of events EWG holds for that project. For example, EWG typically holds 5 open houses for 2 hours each and 1 online chat for an hour for the TIP and Air Quality Conformity. *The hours spent at each meeting will vary from year-to-year.*

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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. EWG's Four Factor analysis shows that the Region has a low, overall LEP population and that EWG has infrequent contact with LEP persons; therefore, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis. EWG is prepared at all times to respond to each request for language assistance and to provide reasonable access to EWG'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 17 provides a list of organizations that can provide EWG these services.

Although EWG 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, EWG 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 EWG's service area. The materials that EWG will translate into Spanish include: (1) EWG'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 EWG's provision of free language assistance services. Translating these documents is a low-cost way for EWG to inform LEP persons about the protections afforded them under Title VI and provide LEP persons a way to request additional information or services. EWG will also place a statement on its website that informs visitors that EWG will provide language assistance services free of charge and upon request. This statement will be placed on EWG'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, EWG recognizes that the Region has certain areas with higher concentrations of LEP persons who may speak languages other than Spanish, so EWG has determined that it will take several low-cost or no-cost proactive steps to provide meaningful access to EWG's program, activities, and services to all LEP persons. These steps include:

- Utilizing bilingual EWG 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. EWG 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.

⁷ The State of Missouri's Cooperative Procurement List can be found online at: <http://archive.oa.mo.gov/purch/cgi/list.cgi>.

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- Working with local groups, citizens, and businesses that represent or work with LEP persons in order to identify appropriate strategies that EWG 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 EWG's LEP Plan.

Table 17. Language Assistance Providers*

Telephone Foreign Language Interpretation (\$33 / hour)	
Corporate Translation Services, Inc. Vancouver, WA (360) 433-0441	Corporate Translation Services, Inc. Vancouver, WA (360) 433-0441
Voiance Language Services LLC Tuscon, AZ (520) 573-2367	Voiance Language Services LLC Tuscon, AZ (520) 573-2367
Language Interpreter – Verbal (\$50 / hour)	
All Access Interpreters LLC St. Louis, MO (314) 259-1010	All Access Interpreters LLC St. Louis, MO (314) 259-1010
International Institute of Metropolitan St. Louis St. Louis, MO (314) 773-9090	International Institute of Metropolitan St. Louis St. Louis, MO (314) 773-9090
Bi-Lingual International Assistant Services St. Louis, MO (314) 645-7800	Bi-Lingual International Assistant Services St. Louis, MO (314) 645-7800
Language Translation – Written (\$.14 / word; \$26 / hour for editing and formatting)	
Bromberg & Associates, LLC Hamtramck, MI (313) 871-0080	Bromberg & Associates, LLC Hamtramck, MI (313) 871-0080
Language Link Vancouver, WA (360) 433-0441	Language Link Vancouver, WA (360) 433-0441
Masterword Services Houston, TX (281)-589-0810	

**Costs are averages across providers 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.*

E. Monitoring, Evaluating & Updating the LEP Plan

EWG 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.), EWG planning staff coordinates with EWG 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, EWG planning staff pays particular attention to this demographic characteristic. EWG 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.

EWG 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 EWG 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. EWG 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. EWG 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, EWG 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 EWG 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 EWG 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, EWG conducts a periodic assessment of LEP needs in the Region and the outreach strategies that EWG can use to engage the LEP community.

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

F. Staff Training

Periodically or as needed, the Title VI Coordinator with assistance of other staff persons conducts training to EWG's planning, research, and support staff. This training includes:

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

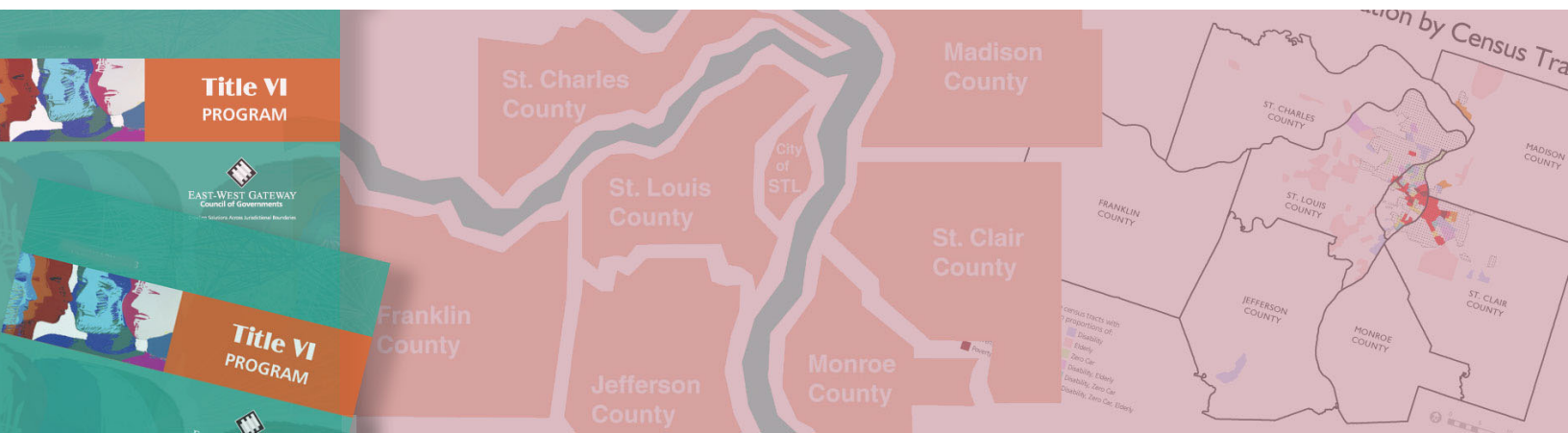
Additionally, if a particular project will include a third-party contractor's services, EWG informs the contractor about its Title VI and LEP obligations (see Appendix 1 for the language that is included in each federally-funded third-party contract).



Appendix 6: Committees



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Appendix 6: Committees

East-West Gateway Council of Governments (EWG) has five standing committees that provide recommendations to the agency's Board of Directors (BOD). These committees include:

- An Executive Advisory Committee (EAC) that provides recommendations to the BOD.
- Four "subject-matter" committees that provide information and support to the agency's initiatives on various program areas including:
 - transportation – including bicycle / pedestrian planning
 - the environment – including air quality and water resources, and
 - public safety / emergency management.

A current list of committee members can be found online at: www.ewgateway.org/about-us/who-we-are/committees/ and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided below. EWG does not select or appoint the members of these committees; however, EWG encourages any BOD member, staff person, or organization to select appointees that best reflect the diversity of the Region and the constituents that a represented organization serves.¹

Executive Advisory Committee (EAC)

The EAC is an advisory committee that makes recommendations to the BOD. The EAC includes 27 members with 21 voting members and 6 non-voting members. EWG's bylaws specify that the voting members of the EAC will be appointed by the BOD members. The non-voting EAC members are appointed by other organizations. The entities and organizations that appoint members to the EAC are as follows:

City / County Governments	
City of St. Louis, Missouri	East St. Louis, Illinois
Franklin County, Missouri	Madison County, Illinois
Jefferson County, Missouri	Monroe County, Illinois
St. Charles County, Missouri	St. Clair County, Illinois
St. Louis County, Missouri	
State Government & Local Entities	
St. Louis Regional Chamber	St. Louis County Municipal League
Southwestern Illinois Conference of Mayors	Southwestern Illinois Metropolitan and Regional Planning Commission
Local, State & Federal Agencies	
Bi-State Development Agency d/b/a Metro	Federal Highway Administration
Missouri Department of Transportation	Federal Aviation Administration
Illinois Department of Transportation	U.S. Department of Housing and Urban Development
Federal Transit Administration	

¹ FTA's circular 4702.1B, Chapter III, Part 10 does not apply to committees that have a membership that is not selected by the recipient.

Appendix 6: Committees

Subject-Matter Committees

Transportation Planning Committee (TPC) – The TPC assists and provides recommendations to the EAC and BOD regarding regional policy decisions as these pertain to the planning of transportation improvements in the eight county, bi-state St. Louis metropolitan area (the Region). The TPC carries out the policies of the BOD relating to transportation plans and exchanges information and viewpoints to arrive at consensus on transportation planning issues. The members to both the Missouri and the Illinois TPCs are appointed by local governmental entities and other organizations in accordance with the TPC's rules of procedures. The TPC members are appointed by the following:

City / County Governments*

Mayor, City of St. Louis, Missouri	County Executive, St. Louis County, Missouri
President, Board of Alderman, City of St. Louis, Missouri	County Board Chairman, Madison County, Illinois
Presiding Commissioner, Franklin County, Missouri	County Board Chairman, Monroe County, Illinois
County Executive, Jefferson County, Missouri	County Board Chairman, St. Clair County, Illinois
County Executive, St. Charles County, Missouri	Mayor, City of East St. Louis, Illinois

Local Entities*

St. Louis Regional Chamber	Vice-President, Southwestern Illinois Council of Mayors
President, Municipal League of Metro St. Louis	President, Southwestern Illinois Metropolitan and Regional Planning Commission
President, Southwestern Illinois Council of Mayors	

Local, State & Federal Transportation Agencies*

Bi-State Development Agency d/b/a Metro	Freight Advisory Committee
St. Clair County Transit District	Bicycle and Pedestrian Advisory Committee
Madison County Transit District	Missouri Department of Transportation
St. Charles County Transit Authority	Illinois Department of Transportation
Special Transportation Management Authority	

*The position listed serves on the TPC or the person holding the position appoints a person to serve on the TPC.

Bicycle and Pedestrian Advisory Committee (BPAC) –The BPAC advises the Council on bicycle and pedestrian related investment, development, and policy issues. The BPAC committee is currently composed of members who are appointed by local entities that are involved in bike / pedestrian planning in accordance with BPAC's bylaws and include: planning or engineering officials from the Region's municipalities, counties, state transportation departments, and transit authorities; representatives from the Region's principal universities; individuals from key public interest and advocacy groups; and individuals representing the general bicycle and walking community. The BPAC includes the organizations listed below.

Local & State Entities

City of St. Louis, Missouri	Great Rivers Greenway
City of O'Fallon, Missouri	Metro East Parks and Recreation District
St. Louis County, Missouri	Missouri Department of Transportation
Bi-State Development Agency d/b/a Metro	Illinois Department of Transportation

Appendix 6: Committees

Non-Profit & Educational Organizations

Trailnet	Cycling Savvy
Citizens for Modern Transit	St. Louis Community Mobility Committee
HeartLands Conservancy	

Air Quality Advisory Committee (AQAC) – The AQAC serves as the advisory body for the BOD and a public forum for the dissemination of information and receipt of feedback about air quality issues. Organizations in the Region that handle or address air quality issues are invited to attend the committee meetings and each of these organizations appoint representatives to the AQAC. The organizations represented include:

Local, State & Federal Entities

Madison County Transit District	Missouri Department of Natural Resources
St. Clair County Transit District	Illinois Environmental Protection Agency
Bi-State Development Agency d/b/a Metro	Missouri Department of Transportation
St. Charles County	Illinois Department of Transportation
St. Louis County	Federal Highway Administration
St. Louis County Municipal League	

Non-Profit & Educational Organizations

American Lung Association of the Upper Midwest	St. Louis University
Missouri Coalition for the Environment	
Missouri Corn Growers Association	

Water Resources Committee (WRC) – The WRC’s primary function is to serve as a place for organizations to share information about projects and programs. Organizations that handle or address water resources are invited to attend the committee members and each of these organizations appoint representatives to this committee. The WRC includes representatives from governmental entities, non-profit organizations, and private industry. The organizations represented include:

City / County Governments

City of St. Louis, Missouri	St. Louis County, Missouri
City of St. Peters, Missouri	Madison County, Illinois
City of Wildwood, Missouri	

Local, State & Federal Entities

Great Rivers Greenway	U.S. Army Corps of Engineers
Kaskaskia Port District	U.S. Geological Survey
Missouri Department of Conservation	U.S. Fish & Wildlife Service
Missouri Department of Natural Resources	

Public Works & Utilities

Metropolitan St. Louis Sewer District	Wentzville Public Works Division
Missouri American Water	

Appendix 6: Committees

Non-Profit & Educational Organizations

Great River Environmental Law Center	The Nature Conservancy
The Open Space Council	NineNetwork of Public Media
Sierra Club	Southern Illinois University – Edwardsville
Ozark Regional Land Trust	St. Louis University
The Open Space Council	
America's Confluence	
Meramec River Recreation Association	
National Great Rivers Research and Education Center	
HeartLands Conservancy	

Private Industry

M3 Engineering Group
SCI Engineering
The Doe Run Company
EcoWorks Unlimited

St. Louis Area Regional Response System (STARRS) Board of Directors (BOD) – The STARRS BOD is a body that is composed of representatives from local government, public safety and emergency response agencies, emergency management agencies, public health departments, hospitals, and other entities that play a role in emergency / disaster preparedness and response. The STARRS BOD consists of 28 voting members and 15 non-voting members, as specified in the STARRS bylaws. In accordance with the STARRS bylaws, the city / county governments and agencies described below appoint members to the STARRS BOD.

City / County Governments*

City of St. Louis, Missouri	St. Louis County, Missouri
Franklin County, Missouri	Madison County, Illinois
Jefferson County, Missouri	Monroe County, Illinois
St. Charles County, Missouri	St. Clair County, Illinois

**The chief elected official of each entity makes the appointment.*

City / County Emergency Management Agencies*

City of St. Louis, Missouri	St. Louis County, Missouri
Franklin County, Missouri	Madison County, Illinois
Jefferson County, Missouri	Monroe County, Illinois
St. Charles County, Missouri	St. Clair County, Illinois

**The chief executive of the agency is the representative or appoints the representative.*

Appendix 6: Committees

In accordance with the STARRS bylaws, each of the discipline areas described below appoint representatives to the STARRS BOD.

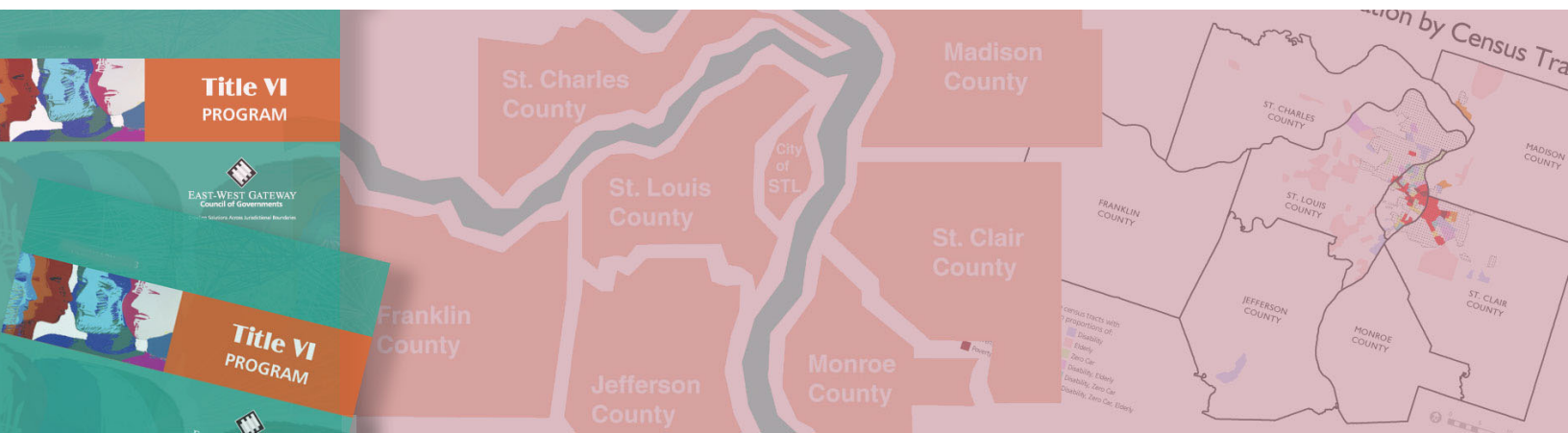
Discipline Areas*	
<i>Fusion Center</i>	<i>Emergency Medical Services</i>
St. Louis County Police Department	St. Charles County Ambulance District MedStar Ambulance
<i>HazMat</i>	<i>Hospital Preparedness</i>
St. Louis City Fire Department	SSM Healthcare Missouri Department of Mental Health
<i>Interoperable Communications</i>	<i>Law Enforcement</i>
Eureka Fire Protection District St. Charles County, Missouri	St. Charles County Police Department St. Louis County Police Department
<i>Public Health</i>	<i>St. Area Regional Coalition of COADs</i>
Franklin County Health Department St. Louis County Health Department	Washington University Emergency Management Agency United Way of Greater St. Louis
<i>Training & Exercise</i>	<i>Urban Search & Rescue</i>
St. Louis County Department of Health St. Louis Metropolitan Police Department	Monarch Fire Protection District Cottleville Fire Protection District
<i>ESF-8 Coordination</i>	<i>Mass Fatality</i>
Missouri Baptist Hospital	City of St. Louis Emergency Management Agency

**It is the discipline area sub-committees that appoint representatives to the STARRS BOD, not the specific agencies / entities noted. The entities / agencies noted reflect the current representation; however, the specific entities / agencies represented may change from year-to-year in accordance with the STARRS' bylaws.*

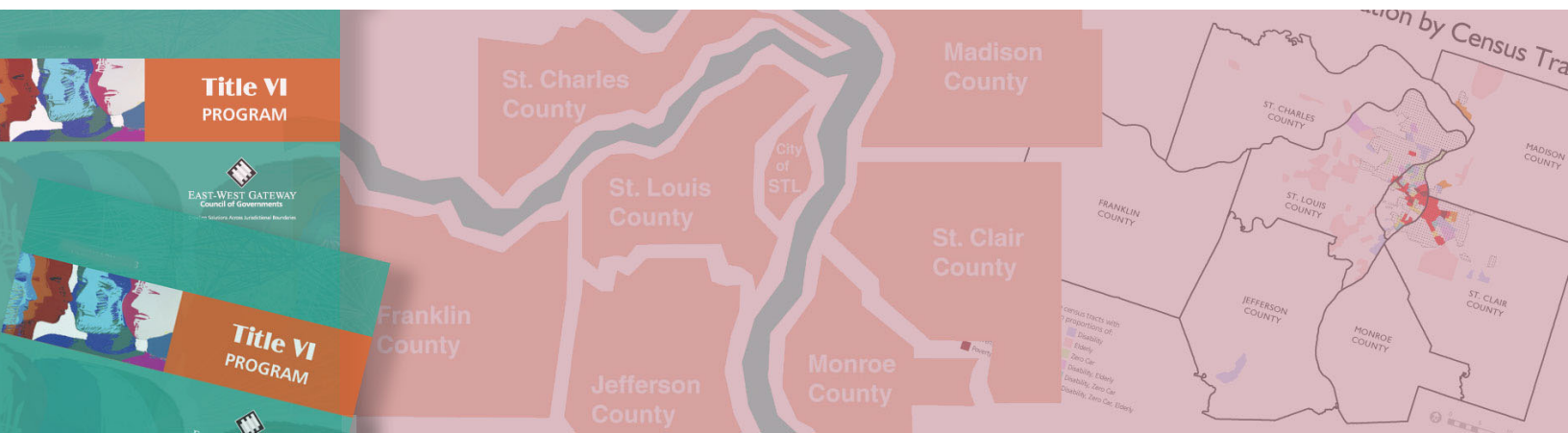
Other*	
Southern Illinois University – Edwardsville Cottleville Fire Protection District	East-West Gateway Council of Governments

**With the exception of the EWG Executive Director, the other representatives are appointed by the STARRS BOD and may change in accordance with the STARRS bylaws.*

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EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

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