

Title VI/ Environmental Justice Program Manual

Savannah

And

Limited English Proficiency Plan

Andrew County

Country Club
Village

Doniphan County

Wathena

Elwood

St. Joseph

**For the
Saint Joseph Area Transportation Study Organization**

Adopted April 10th, 2008

Buchanan County

Table of Contents

Introduction	3
Policy Statement	5
Program Area 1: Communications and Public Involvement	7
Program Area 2: Planning and Programming	9
Program Area 3: Environmental Affairs	10
Program Area 4: Consultant Contracts	11
Program Area 5: Education and Training	11
Limited English Proficiency Plan	13
Appendix 1: SJATSO Title VI Assurances	15
Appendix 2: Title VI Complaint Procedures	19
Appendix 3: Title VI Complaint Form	21
Appendix 4: Public Involvement Plan	26
Appendix 5: Notice to the Public	27
Appendix 6: Data Collection & Reporting Requirements	28
Appendix 7: Executive Order 13166	30

ST. JOSEPH MPO TITLE VI PROGRAM MANUAL

“It has been The Federal Highway Administration's (FHWA's) and the Federal Transit Administration's (FTA's) longstanding policy to actively ensure nondiscrimination under Title VI of the 1964 Civil Rights Act in Federally funded activities. Under Title VI and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, or national origin. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all program and activities of Federal-aid recipients, subrecipients and contractors whether those programs and activities are federally funded or not.” (United States Department of Transportation)

Introduction

The St. Joseph Area Transportation Study Organization (SJATSO) serves as the federally designated Metropolitan Planning Organization (MPO) for the region, and as such is responsible for ensuring that transportation programs utilizing federal funds in the St. Joseph region are based on a continuing, comprehensive, and coordinated planning process.

SJATSO seeks to build a stronger regional community through cooperation, leadership and planning. Through SJATSO's leadership, area jurisdictions and diverse community interests sit down together to address the region's problems and identify the opportunities for cooperative solutions. These efforts, in turn, enhance the effectiveness of local government.

SJATSO plays an active leadership role in strengthening the metropolitan community by providing:

- A forum for addressing regional objectives and diverse community issues;
- Long-range planning and public policy coordination; and
- Technical assistance and services to enhance the effectiveness of local government.

Members

SJATSO serves the three-county St. Joseph region, which includes five separate city governments. A bi-state MPO, SJATSO's boundaries include portions of the following counties:

- In Missouri:
 - Buchanan
 - Andrew
- In Kansas:
 - Doniphan

SJATSO's Coordinating Committee (Policy Board) consists of locally elected and appointed leaders (individuals appointed to their positions directly by locally elected officials) representing these units of government.

In addition to the above geographic jurisdictions, SJATSO also works closely with the following:

- Transit Operators:
 - City of St. Joseph (urban core city and transit operator)
- State Departments of Transportation:
 - Missouri Department of Transportation (MoDOT)
 - Kansas Department of Transportation (KDOT)
- Federal Transit Administration (FTA)
- Federal Highway Administration (FHWA)

Benefits of working with the MPO include a voice in key regional decisions, distribution of federal transportation dollars, technical assistance to obtain federal and state funding, education and training

opportunities, data to meet special planning needs, access to Geographic Information Systems (GIS) databases, access to data products, and technical expertise.

Boards and Committees

SJATSO is governed by a Coordinating Committee consisting of local leaders from the member units of government. Transportation planning at SJATSO is overseen by the Technical Committee, which provides technical support and recommendations to the Coordinating Committee.

Committees are appointed by the individual boards based upon need. The following committees have been formed historically:

- Steering Committee – for the Long Range Transportation Plan Update
- Nominating Committee – to nominate officers to the individual boards for annual elections
- Transit – Job Access and related matters
- Section 5310 Committee – to review and prioritize agency funding applications

Policy Statement and Authorities

The St. Joseph MPO (SJATSO) assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. SJATSO further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. In the event SJATSO distributes federal aid funds to another governmental entity, SJATSO will include Title VI language in all written agreements and will monitor for compliance. SJATSO's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other SJATSO responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Janice Hatcher, Chairperson

Date

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 23 CFR 200.9 and 49 CFR 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid Recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include: Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; 42 USC 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 28 CFR 50.

Organization

SJATSO's Transportation Planning Manager is responsible for ensuring implementation of the agency's Title VI program. The Transportation Planning Manager is responsible for coordinating the overall administration of the Title VI program, plan, and assurances (See Appendix 1).

Five areas of SJATSO's work program have been identified as applicable to Title VI regulations – they are referred to as the five Title VI Program Areas:

1. Communications and public involvement
2. Planning and programming
3. Environmental affairs
4. Consultant contracts
5. Education and training

The agency's Title VI-related responsibilities fall into two main categories – "general responsibilities," applicable to all five Title VI Program Areas, and "Program Area Responsibilities" that are specific to each Title VI Program Area. It is important to note that the first three Title VI Program Areas noted above are extremely interrelated – they have been treated separately for purposes of clarity and corresponding to agency organization. For example, the Communications and Public Involvement program area applies to and affects the agency work program as a whole, particularly agency efforts and responsibilities related to planning, programming, and environmental affairs.

SJATSO's Transportation Planning Manager (TPM) is generally responsible for overseeing Title VI compliance in each of the program areas. Other staff members are expected to provide information and support to assist this staff member perform his or her tasks.

General Responsibilities

Following are general Title VI responsibilities of the agency applicable to all five Title VI Program Areas. The TPM, with involvement and assistance from other members of staff, is responsible for ensuring these elements of the plan are appropriately implemented and maintained.

1. **Data Collection.** Statistical data on race, color, national origin, income level, language spoken, and sex of participants in, and beneficiaries of, federally funded programs is to be gathered and maintained as described in the "Program Area Responsibilities" section of this document. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program.

2. **Annual Report and Update.** An Annual Report and Update is to be submitted by the end of July each year, to MoDOT and KDOT's offices of Civil Rights, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). The Title VI Coordinator is responsible for gathering information from appropriate staff members and consolidating this information into the final document. The final document is to include:

- a. A report on the previous year's Title VI-related activities and efforts, including accomplishments and program changes.
- b. An update on Title VI-related goals and objectives for the upcoming year.

3. **Annual Review of Title VI Program.** Each year, in preparing for the Annual Report and Update, the Title VI Coordinator will review the agency's Title VI program to assure compliance with Title VI. In addition, he or she will review agency operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate.

4. **Dissemination of Information Related to the Title VI Program.** Information on the agency's Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "Program Area Responsibilities" section of this document, and in other languages when needed.

5. **Resolution of Complaints.** Any individual may exercise his or her right to file a complaint with SJATSO, if that person believes that he or she or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, or national origin. SJATSO will make a concerted effort to resolve complaints as put forth in its Title VI Complaint Procedure, found in Appendix 2.

6. **Procedures Manual.** A procedures manual for the agency's Title VI program, incorporating the day-to-day procedures necessary to maintain the program, will be developed by SJATSO, and be updated regularly to incorporate changes and additional responsibilities.

Responsibilities of the Transportation Planning Manager Regarding Title VI

The Title VI Coordinator is responsible for supervising staff activities pertaining to Title VI regulations and procedures set forth in federal guidance and according to SJATSO's Title VI Procedures Manual. In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process Title VI complaints received by SJATSO, as described in Appendix 2.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to SJATSO's Title VI program.

- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- If a federal funding recipient is found to not be in compliance with Title VI, work with staff involved with Consultant Contracts and the recipient to resolve the deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this plan.
- Review important Title VI-related issues with the Chairperson, as needed.
- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.

Responsibilities of Other Staff Members

Other staff members, under supervision of the Title VI Coordinator, will at times be asked to accept or share responsibility for day-to-day administration of the Title VI program, including implementation of the plan and Title VI compliance, program monitoring, reporting, and education within an applicable program area, as described in the "Program Area Responsibilities" section of this document. In addition, some staff members may be asked to accept responsibility for drafting text for an assigned section of the Annual Title VI Report and Update, and maintaining the data and documentation necessary for that report. These responsibilities may include reviewing guidelines and procedures for the assigned Title VI Program Area, and incorporating Title VI-related language and provisions into agency documents, as appropriate.

Program Area Responsibilities

➤ **Program Area 1: Communications and Public Involvement**

Note: The Communications and Public Involvement Program Area applies to and affects the agency work program as a whole, particularly agency efforts and responsibilities related to the Planning and Programming and Environmental Affairs Program Areas. It has been treated as a separate program area for purposes of clarity, and corresponding to agency organization. See Appendix 4 for the agencies adopted Public Involvement Plan.

As stated in the agency's Public Involvement Plan, "SJATSO's goal is to have significant and ongoing public involvement in the transportation planning process...SJATSO also seeks to empower the public to voice their ideas and values regarding transportation issues. SJATSO strives to ensure early and continuous public involvement in all major actions and decisions." This Public Involvement Plan provides the outline of SJATSO's procedures for ensuring open and effective communication with citizens in the St. Joseph region.

Principles of SJATSO's Public Involvement Plan:

- Equal access is an essential part of the public involvement process.
- Public notification is one of the primary functions of the Metropolitan Planning Organization.
- It is the responsibility of the agency to offer access to information and provide timely public notice, as well as to educate the public about the planning process.

Elements of SJATSO's Public Participation Plan:

- **Meetings:** SJATSO's committee structure provides an opportunity for local governments and citizens to interact in order to address transportation and air quality issues. The committees allow those who work in the field and those with interests in transportation to meet on a regular basis to discuss issues, share information, and coordinate planning activities. SJATSO complies with Chapter 610 of the Revised Statutes of Missouri, as amended, known as the Sunshine Law as it pertains to open records and open meetings, and encourages any interested citizen to attend open meetings.
- **Website:** SJATSO maintains a website <http://www.ci.st-joseph.mo.us/publicworks/mpo.cfm>, which is updated regularly. This site includes information on the agency's responsibilities, programs, publications, and press releases; contact information for all staff; a search function; the

Title VI Plan, complaint procedures, and complaint form; and will provide the ability for the public to provide comments on SJATSO's programs and policies.

- **Press releases:** Press releases are routinely sent to news media in the three-county region, when press coverage of specific events or decisions is warranted. The table below lists the agencies in which press releases are distributed for public record:

Andrew County	Buchanan County	Doniphan County
City of Savannah Andrew Co. Road Dept.	City of St. Joseph St. Joseph Public Works Office Buchanan Co. Planning Dept. Buchanan Co. Road Dept. Village of Country Club MoDOT District 1	City of Wathena City of Elwood Doniphan Co. Planning Dept. Doniphan Co. Road Dept. Doniphan Co. Libraries

- **Opportunities for public comment:** SJATSO routinely provides opportunities for public comment, and continues to work to fund new and innovative ways to solicit public comments and involve all segments of the population in the St. Joseph metropolitan region. Comments are accepted by phone, fax, email, US mail, and in person at any open meeting. See the section below entitled "Opportunities for Public Comments" for more information.
- **Staff is accessible:** Staff is accessible in person, on the phone, by mail, by fax, by email, or by online comment forms. Contact information for all staff is provided on the agency's website.
- **Events:** Events such as workshops, open houses, and forums are held on an as-needed basis. These events are open to the public.

Opportunities for Public Comments

SJATSO routinely offers three different ways for people to comment on activities, programs, and decisions made at the agency. These four ways are:

- **Comments are accepted at any time:** Comments are accepted via an online comment form, by phone, fax, email, US mail, and in person at any board or committee meeting. Contact information for all staff is provided on the agency website, and contact information for SJATSO is included in all publications produced for SJATSO. SJATSO makes every effort to respond to all comments received.
- **Citizen comments are requested at meetings:** All SJATSO Board and committee meetings are open to the public. Meeting dates are posted well in advance on the agency's website. Public comments and responses made during these meetings are kept on record in the official meeting summaries. The Board maintains mailing lists, to which anyone can request to be added.
- **Formal public comment periods for major activities:** Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, the proposed distribution of funds, major amendments to the Transportation Improvement Program (TIP), changes to SJATSO policies (such as the Public Involvement Plan), and updates to SJATSO's Long-Range Transportation Plan (LRTP). The comment period is highlighted in via a legal notice, as well as other agency publications, on the SJATSO website, and in various press releases. Comments can be made in person, using a comment form on the agency's website, by email, by US mail, fax, or telephone. SJATSO will make every effort to respond to any comments received, and will forward comments to other agencies when appropriate. Received comments and staff responses will be reviewed at the next applicable committee meeting(s), at which time the committee(s) will determine whether it is appropriate to proceed with the recommended action.

Strategies for Engaging Title VI Protected Groups

SJATSO realizes that there are large segments of the population from whom input is rarely if ever received. In an effort to hear a truly representative voice of the public, SJATSO will take the approach of “going to the public,” in addition to receiving public comment from and educating those already interested and involved. As part of this effort, SJATSO will take the following steps on its major efforts involved with the LRTP:

- **Plan meeting locations carefully:** Public meetings should be held in locations that are accessible by public transit. Also, facilities should be compliant with the Americans with Disabilities Act. If a targeted population is located in a certain geographic area, then the meeting location should be in that area for their convenience.
- **Seek help from community leaders and organizations:** To facilitate involvement of traditionally underserved populations, community leaders and organizations that represent these groups should be consulted about how to most effectively reach their members. Relationships with these groups should be maintained for future partnerships in the planning process.
- **Provide services for the disabled:** Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public involvement will include contact information for people needing these or other special accommodations. Requests must be made at least 24 hours in-advance of the meeting for support.
- **Be sensitive to diverse audiences:** At public meetings, SJATSO staff should attempt to communicate as effectively as possible. Technical jargon should be avoided and appropriate dress and conduct are important. For some meetings, it may be best to use trained facilitators or language translators to better communicate with the audience.

Title VI Responsibilities

Staff involved in public involvement is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency’s public involvement process. These staff members will:

- Ensure that all communications and public involvement efforts comply with Title VI.
- Develop and distribute information on Title VI and agency programs to the general public. Provide information in languages other than English, as needed.
- Disseminate information to minority media and ethnic/gender related organizations, to help ensure all social, economic, and ethnic interest groups in the region are represented in the planning process.
- Include the Title VI Notice to the Public, full or abbreviated versions, in relevant press releases and on the agency website.
- Notify affected, protected groups of public hearings regarding proposed actions, and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.
- Collect statistical information on attendees of public meetings to track how well different segments of the population are represented.
- Encourage SJATSO’s committee structure to include representation from Title VI relevant populations.

➤ Program Area 2: Planning and Programming

SJATSO is responsible for developing long- and short-range transportation plans to provide efficient transportation services to the St. Joseph metropolitan area. A comprehensive transportation planning process is used, which entails the monitoring and collection of carried data pertaining to transportation issues. SJATSO coordinates with MoDOT, KDOT, cities, counties, and area transit agencies; seeks public involvement; and provides technical support when needed.

Operational Guidelines

Primary guidance is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450
- The Safe, Affordable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU)
- State and Federal Clean Air Acts and Amendments

Key Planning and Programming Activities

As the designated MPO for the St. Joseph region, SJATSO receives federal funds to develop regional transportation plans and programs and to coordinate technical and policy studies on a wide range of transportation and other programs. The primary products of the transportation planning process include:

- Long-Range Transportation Plan (LRTP)
- Transportation Improvement Program (TIP)
- Public Participation Plan (PPP)
- Intelligent Transportation System (ITS) Architecture
- Unified Planning Work Program (UPWP)

Considerations of Title VI

Considerations of Title VI legislation are made throughout SJATSO's planning and programming activities, for example:

- **LRTP:** The development of SJATSO's long range transportation plan includes an environmental justice analysis to ensure that the burdens and benefits of planned transportation activities are equitably distributed across racial and socio-economic groups. SJATSO staff reviewed the impacts that planned programs and projects would have on low-income and minority residents in such areas as transportation investments, effect of projects on travel times of area residents, and access to transit.
- **Transportation Improvement Program (TIP):** The region's five-year TIP includes an analysis of effects of planned transportation investments on disadvantaged residents similar to that of Transportation Outlook 2030.

Title VI Responsibilities

Staff members involved in planning and programming are responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's planning and programming processes. These staff members will:

- Ensure that all aspects of the planning and programming process operation comply with Title VI.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data. Make the document available to the public and member agencies on SJATSO's website or in hard copy format, if requested.
- Develop a process for assessing the distributional effects of transportation investments in the region as part of actions on plan and programming documents.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process

➤ Program Area 3: Environmental Affairs

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of regional transportation planning, environmental justice considers the relative

distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

Operational Guidelines

- Executive Order 12898 on environmental justice, and federal and state administrative guidelines for implementing environmental justice requirements.

Title VI Responsibilities

Staff members are responsible for evaluating and monitoring environmental justice compliance with Title VI. Staff members will:

- Ensure Title VI environmental justice compliance.
- Analyze and make findings regarding the population affected by the action.
- Analyze and make findings regarding the impacts of planned projects on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.
- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all agency public involvement procedures. This includes dissemination to groups representing minority media and ethnic/gender related organizations, and the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

➤ **Program Area 4: Consultant Contracts**

SJATSO is responsible for selection, negotiation, and administration of its consultant contracts. SJATSO operates under its internal contract procedures and all relevant federal and state laws.

Operational Guidelines:

- Title 49 – FTA Grant Contracting Requirements
- Title 23, CFR 172 – Administration of Engineering and Design related Service Contracts

Contract Procedures

SJATSO's contract procedures are outlined in the "City of St. Joseph Purchasing Policy". SJATSO verifies Title VI compliance by consultants (subrecipients of federal funds) in the contracting process. Signature of the terms of the contract is used to verify compliance on the part of the consultant. In addition, Title VI text is included in all SJATSO Requests for Proposals.

Title VI Responsibilities

Title VI responsibilities associated with consultant contracts include the following:

- Ensure inclusion of Title VI language in contracts and Requests for Proposals (RFP).
- Review consultants for Title VI compliance as described below:
 - Ensure that all consultants verify their compliance with Title VI procedures and requirements.
 - If a recipient or subrecipient is found to not be in compliance with Title VI, the Title VI Coordinator and relevant staff will work with the recipient or subrecipient to resolve the deficiency status and will write a remedial action if necessary.

➤ **Program Area 5: Education and Training**

Minorities, women, veterans, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in all employment-related decisions, including opportunities for education and training.

Employees Encouraged to Participate in Training

All SJATSO employees are encouraged to participate in professional development and training. All materials received by the agency on training and education opportunities are made available to all

employees, which includes all information on federally funded training, such as courses provided by the National Highway Institute (NHI) and National Transit Institute (NTI).

Title VI Responsibilities

Under the category of education and training, Title VI responsibilities include:

- Assisting in the distribution of information to SJATSO staff on training programs regarding Title VI and related statutes.
- Ensure equal access to, and participation in, applicable NHI and NTI courses for qualified SJATSO employees.
- Track staff participation in Title VI, NHI and NTI courses.
- Establish, maintain, and update a Title VI procedures manual containing general information pertaining to the administration of SJATSO's Title VI program, as well as related documents (such as a complaint form).

Questions

For questions on SJATSO's Title VI Plan and Procedures, please contact the Title VI Coordinator at 816.271.4653 or by email at kmarr@ci.st-joseph.mo.us. For information on SJATSO's work programs or publications, please see the SJATSO website.

LIMITED ENGLISH PROFICIENCY

Policy

It is the policy of the St. Joseph Transportation Study Organization to provide meaningful access to its programs and persons who, as a result of national origin, are limited in English proficiency. This LEP Plan will be established pursuant to and in accordance with Executive Order 13166. This directive applies to all program areas within the Metropolitan Planning Organization.

Statement of Principal

LEP persons are those whose proficiency in speaking, reading, writing, or understanding English, as a result of national origin, is such that it would deny or limit their meaningful access to programs and services provided by SJATSO if language assistance were not provided. SJATSO is taking a number of steps, as outlined in this document, to assist LEP individuals in accessing SJATSO's programs and services and is committed to improving access.

SJATSO's Limited English Proficiency Population

According to Census 2000 data, approximately 3% of persons in the three SJATSO counties speak a language other than English at home, with Spanish, German, and French being the most used non-English languages. Only Spanish was in use at home by more than 1% of St. Joseph area residents.

Proposed Actions

As the agency responsible for coordinating the regional transportation planning process, SJATSO must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and under represented population groups is part of the evaluations process. SJATSO provides oversight and helps ensure that LEP and other protected classes of persons are not overlooked in the transportation planning process.

Federal Fund recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. SJATSO defines an interpreter as a person who translates spoken language orally. A translator is defined as a person who transfers the meaning of written text from one language to another.

Considering the relatively small population of SJATSO, the small number of LEP individuals in the service area, and limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services.

SJATSO will:

- Provide with advanced notice of 24 hours, interpreter services at the Technical Committee and Coordinating Committee meetings. Interpreters include foreign language and hearing impaired.
- Maintain a list of those staff members who speak a language other than English to provide points of contact for persons needing information. In addition,
- Establish a list of qualified interpreters and businesses that can provide translation services in the event that a translation is needed.
- Provide a statement in notices and publications that interpreter services are available for the meetings listed above with 24 hours advance notice.
- Publication of MPO and federal complaint forms on the website.
- Post all notices of SJATSO's non-discrimination policies and information on the MPO website.

Staff Training

MPO staff will be provided training on the requirements for providing meaningful access to services for LEP persons.

Appendix 1
SJATSO Title VI Assurances

The St. Joseph MPO HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The St. Joseph MPO will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The St. Joseph MPO will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

_____ DATE: _____
Janice Hatcher, Chairperson
St. Joseph MPO

(SIGNATURE OF AUTHORIZED OFFICER)

Part A

Department of Transportation Title VI Assurance

The St. Joseph MPO (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its FTA Programs 5307 and 5309:

1. That the Recipient agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following (or the most current approved clause approved by the FTA) notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all FTA Programs 5307 and 5309 and, in adapted form in all proposals for negotiated agreements:

The St. Joseph MPO, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.
3. That the Recipient shall insert the most current and approved contractual clauses relative to this subject in every contract subject to this Act and the Regulations.
4. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the FTA Programs 5307 and 5309 and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the FTA Programs 5307 and 5309. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

_____ DATED: _____
Janice Hatcher, Chairperson
St. Joseph MPO

Part B
Contract Assurances

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

- (1) Compliance with Regulations: The contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
- (2) Nondiscrimination: The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
- (4) Information and Reports: The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the St. Joseph MPO or the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the St. Joseph MPO, or the Federal Transit Administration as appropriate, and shall set forth what efforts it has made to obtain the information.
- (5) Sanctions for Noncompliance: In the event of the contractor's noncompliance with nondiscrimination provisions of this contract, the St. Joseph MPO shall impose contract sanctions as it or the Federal Transit Administration may determine to be appropriate, including, but not limited to:
 - (a) withholding of payments to the contractor under the contract until the contractor complies; and/or
 - (b) cancellation, termination, or suspension of the contract, in whole or in part.
- (6) Incorporation of Provisions: The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as the St. Joseph MPO or the Federal Transit Administration may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the St. Joseph MPO to enter into such litigation to protect the interests of the St. Joseph MPO, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

APPENDIX 2

Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the federally funded programs of the St. Joseph MPO (SJATSO). For Title VI complaints against other St. Joseph region agencies, or if you believe you have suffered housing or employment discrimination, please contact the appropriate agency as listed in Appendix ____.

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The St. Joseph MPO has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter VII of the Federal Transit Administration Circular 4702.1, dated May 26, 1988. If you believe that SJATSO's federally funded programs have discriminated your civil rights on the basis of race, color, or national origin you may file a written complaint by following the procedure outlined below:

TITLE VI COMPLAINT PROCEDURE

1. Submission of Complaint. Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the MPO may file a written complaint with SJATSO's Transportation Manager. A sample complaint form may be downloaded or is available in hard copy from the St. Joseph MPO. Such complaints must be filed within 180 calendar days after the date the discrimination occurred. *Note: Upon request, assistance in the preparation of any necessary written material will be provided to a person or persons who are unable to read or write.* Complaints should be mailed to:

St. Joseph MPO
Title VI Administrator
1100 Frederick Avenue, Suite 204
St. Joseph, MO 64501

2. Referral to Review Officer. Upon receipt of the complaint, SJATSO's Chairperson shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint, in consultation with an approved SJATSO Attorney. The Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the MPO received the complaint. If more time is required, SJATSO's Chairperson shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the MPO's processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to SJATSO's Chairperson for concurrence. If SJATSO's Chairperson concurs, he or she shall issue the MPO's written response to the Complainant. *Note: Upon receipt of a complaint, SJATSO shall forward a copy of this complaint and the resulting written response to the appropriate MoDOT, KDOT, and FTA-Region 7 contacts.*

3. Request for Reconsideration. If the Complainant disagrees with SJATSO's Chairperson's response, he or she may request reconsideration by submitting the request, in writing, to SJATSO's Chairperson within 10 calendar days after receipt of SJATSO's Chairperson's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by SJATSO's Executive Director. SJATSO's Chairperson will notify the Complainant of his or her decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where SJATSO's Chairperson agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

4. Appeal. If the request for reconsideration is denied, the Complainant may appeal SJATSO's Chairperson's response by submitting a written appeal to the MPO Board no later than 10 calendar days after receipt of SJATSO's Chairperson's written decision rejecting reconsideration.

5. Submission of Complaint to the State of Missouri and/or State of Kansas Department of Transportation. If the Complainant is dissatisfied with the MPO's resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Missouri and/or the State of Kansas Department of Transportation for investigation.

MoDOT Office of External Civil Rights
External Civil Rights Administrator
PO Box 270
Jefferson City, MO 65102

Or

KDOT Office of Civil Rights
Eisenhower State Office Building
700 Southwest Harrison
3rd Floor West
Topeka, KS 66603

**APPENDIX 3
Title VI Complaint Form
St. Joseph MPO**

The purpose of this form is to assist you in filing a complaint with the St. Joseph MPO (SJATSO). You are not required to use this form; a letter containing the same information will be sufficient. It is important, however, to include all information related to items marked with a star (*), whether or not the form is used.

1.* State your name and address

Name: _____

Address: _____

Telephone Number:

Home: (____) _____ Work: (____) _____

2.* Person discriminated against if different from above:

Name: _____

Address: _____

Telephone Number:

Home: (____) _____ Work: (____) _____

Please explain your relationship to this person(s):

3.* Agency, department, or program that discriminated:

Name: _____

Any individual (if known): _____

Address: _____

Telephone Number: (____) _____

4A.* Non-Employment: Does your complaint concern discrimination in the delivery of services or in other discriminatory actions of the MPO in its treatment of you or others? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "Sex: Female).

_____ Race/Color: _____
_____ National Origin: _____
_____ Sex: _____
_____ Religion: _____
_____ Age: _____
_____ Disability: _____

4B.* Employment: Does your complaint concern discrimination in employment by the MPO? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "National Origin: Canadian").

_____ Race/Color: _____
_____ National Origin: _____

5. What is the most convenient time and place for use to contact you about this complaint?

6. If we will not be able to reach you directly, you may wish to give us the name and phone number of a person who can tell us how to reach you and/or provide information about your complaint:

Name: _____

Telephone Number: (____) _____

7. If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name of attorney: _____

Address of attorney: _____

Telephone number of attorney: (____) _____

8.* To your best recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____

Most recent date of discrimination: _____

14. Have you (or the person discriminated against) filed the same or any other complaints with other agencies such as the MoDOT or KDOT Office of Civil rights, etc.?

Yes _____

No _____

If so, do you remember the complaint number?

Against what agency and department or program was it filed?

Address: _____

Telephone Number: (____) _____

Date of filing: _____ Agency: _____

Briefly, what was the complaint about?

What was the result?

15. Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any of the following?

_____ U.S. Equal Employment Opportunity Commission

_____ Federal or State Court

_____ Your State Equal Opportunity Office and/or local Office of Human Rights

16. If you have already filed a charge or complaint with an agency indicated in #15 above, please provide the following information (attach additional pages if necessary):

Agency: _____

Date Filed: _____

Case or Docket Number: _____

Date of Trial/Hearing: _____

Location of Agency/Court: _____

Name of Investigator: _____

Status of Case: _____

Comments:

17. How did you learn that you could file this complaint?

18.* We cannot accept a complaint if it has not been signed. Please sign and date this complaint form below.

(Signature) (Date)

Please feel free to add additional sheets to explain the present situation to us.

Please mail the completed, signed Discrimination Complaint Form (please make one copy for your records) to:

St. Joseph MPO

Attn: Title VI Administrator

1100 Frederick Avenue

St. Joseph, MO 64501

Phone: (816) 271-4653

APPENDIX 4
Public Involvement Plan

SJATSO's approved Public Involvement Plan may be accessed at on the MPO website at <http://www.ci.st-joseph.mo.us/publicworks/mpo.cfm>, or you may contact the SJATSO offices to request a hard copy.

APPENDIX 5
Notice to the Public

The paragraph below will be inserted into all significant publications that are distributed to the public, such as future versions and updates of the Long Range Transportation Plan. The text will be placed permanently on the agency's website. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

The St. Joseph MPO (SJATSO) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which SJATSO receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with SJATSO. Any such complaint must be in writing and filed with SJATSO's Title VI Coordinator within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discriminatory Complaint Form, please see our website at <http://www.ci.st-joseph.mo.us/publicworks/mpo.cfm>

A shortened version of the above paragraph, such as the example below, may be used in publications where space or cost is an issue:

SJATSO fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information or to obtain a Title VI Complaint Form, <http://www.ci.st-joseph.mo.us/publicworks/mpo.cfm>, or call 816.271-4653.

Appendix 6 Data Collection & Reporting Requirements

SJATSO will comply with the following data collection and reporting requirements as outlined in Urban Mass Transit Administration (UMTA) [now FTA] Circular 4702.1:

General Reporting Requirements:

All applicants, recipients, and subrecipients are required to maintain and provide to FTA^{*} the information outlined below. The information is required under DOJ regulation and must be submitted prior to the approval of any grant application. Recipients and subrecipients should provide updated information as conditions warrant. Updates must at a minimum be provided every three years. Information previously submitted under the General Reporting Requirements may be referenced in subsequent submissions, as appropriate.

All applicants, recipients, and subrecipients shall maintain and submit the following general requirements:

- a. A list of any active lawsuits or complaints naming the applicant, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. The list should include: the date the lawsuit or complaint was filed; a summary of the allegation; and the status of the lawsuit or complaint, including whether the parties to the lawsuit have entered into a consent decree. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part (e.g., not all information on all modes of transportation).
- b. A description of all pending applications for financial assistance, and all financial assistance currently provided by other Federal agencies. For applicants of assistance under Section 6, 10, 16(b)(2) and 18, this information should be maintained and made available to FTA on request. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.
- c. A summary of all civil rights compliance review activities conducted in the last 3 years. The summary should include: the purpose or reason for the review; the name of the agency or organization that performed the review; a summary of the findings and recommendations of the review; and, a report on the status and/or disposition of such findings and recommendations. For all applicants for FTA assistance, this information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.
- d. A signed FTA Civil Rights Assurance that all of the records and other information required under Circular 4702.1 have been or will be compiled, as appropriate, and maintained by the applicant, recipient, or subrecipient. In the case of State administered programs, this assurance should be provided by the primary and subrecipient (Appendix 1).
- e. A signed standard DOT Title VI Assurance. This assurance will be maintained as part of the FTA "One Time Submission" file (Appendix 1, Part A).

^{*} The original circular references UMTA. The wording in this document been changed to FTA to reflect the agency's name modification.

f. For construction projects, a fixed-facility impact analysis to assess the effects on minority communities. If this information has been prepared as a result of an environmental assessment or environmental impact statement, the applicant, recipient, or subrecipient should reference the relevant information by document, page number(s), and date of submission to FTA. The analysis should include:

- A discussion of the potential impact on minority communities and minority-owned businesses during and after construction;
- A discussion of all potential negative environmental impact, such as noise, air, or water pollution;
- A detailed list of minority-owned businesses and households that will be affected by the construction project;
- A description of other significant changes or impacts on the minority community, such as increased traffic, reductions in the amount of available parking, etc.; and
- A description of the relocation program and/or other measures adopted by the applicant that will be used to mitigate any identified adverse social, economic, or environmental effect of the proposed construction project.

Appendix 7
Executive Order 13166

THE WHITE HOUSE

Office of the Press Secretary
(Aboard Air Force One)

For Immediate Release

August 11, 2000

EXECUTIVE ORDER

13166

**IMPROVING ACCESS TO SERVICES FOR
PERSONS WITH LIMITED ENGLISH PROFICIENCY**

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP), it is hereby ordered as follows:

Section 1. Goals.

The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English language. The Federal Government is committed to improving the accessibility of these services to eligible LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. To this end, each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency. Each Federal agency shall also work to ensure that recipients of Federal financial assistance (recipients) provide meaningful access to their LEP applicants and beneficiaries. To assist the agencies with this endeavor, the Department of Justice has today issued a general guidance document (LEP Guidance), which sets forth the compliance standards that recipients must follow to ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. As described in the LEP Guidance, recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Sec. 2. Federally Conducted Programs and Activities.

Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans.

Sec. 3. Federally Assisted Programs and Activities.

Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their

existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order, each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its guidance document in the Federal Register for public comment.

Sec. 4. Consultations.

In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.

Sec. 5. Judicial Review.

This order is intended only to improve the internal management of the executive branch and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers or employees, or any person.

WILLIAM J. CLINTON

THE WHITE HOUSE,
August 11, 2000.

<http://www.usdoj.gov/crt/cor/Pubs/eolep.htm>