

**Title VI / Environmental Justice Policy Manual
&
Limited English Proficiency Plan**

Columbia Area Transportation Study Organization

Approved by the CATSO Coordinating Committee on May 22, 2014

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COLUMBIA MPO TITLE VI POLICY MANUAL

“It has been the Federal Highway Administration's (FHWA) and the Federal Transit Administration's (FTA) 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, sub-recipients and contractors whether those programs and activities are federally funded or not.” (United States Department of Transportation)

Introduction

The Columbia Area Transportation Study Organization (CATSO) 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 Columbia region are based on a continuing, comprehensive, and coordinated planning process.

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

CATSO plays an active leadership role in strengthening the metropolitan community by providing a forum for addressing regional transportation objectives and diverse community issues, as well as long-range planning and public policy coordination.

Members

CATSO serves the Columbia Metropolitan Area. Member governmental jurisdictions include the City of Columbia and Boone County, with MoDOT also a party to the CATSO Memorandum of Understanding (MOU).

The CATSO Coordinating Committee serves as the MPO Policy Board. It consists of locally elected and appointed leaders and individuals appointed to their positions directly by locally elected officials representing these units of government. Members of the Committee are from MoDOT, Boone County, and the City of Columbia. In addition to these jurisdictions, CATSO also works with the following:

- Transit Operators – Columbia Transit System (City of Columbia) and private businesses
- Federal Highway Administration
- Federal Transit Administration
- University of Missouri
- Columbia Public Schools

- Mid-Missouri Regional Planning Commission

The 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

CATSO’s policy board, called the Coordinating Committee, consists of local leaders from the member units of government, as well as members of MoDOT. The Technical Committee provides technical support and recommendations to the Coordinating Committee.

Sub-committees are appointed by the individual boards based upon need. Most recently, a steering committee was formed to oversee the preparation of the Long Range Transportation Plan (LRTP) update.

Policy Statement and Authorities

The Columbia MPO (CATSO) 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. CATSO 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 CATSO distributes federal aid funds to another governmental entity, CATSO will include Title VI language in all written agreements and will monitor for compliance. CATSO’s Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other CATSO responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Chair

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, sub recipients, 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

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

Five areas of CATSO'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 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.

CATSO's Title VI Coordinator 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 Coordinator, 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 Division of External Civil Rights, the FHWA and the 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 CATSO, 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. CATSO will make a concerted effort to resolve complaints as put forth in the Title VI Complaint Procedure, found in Appendix 2.

Responsibilities of the Title VI Coordinator

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 CATSO'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 CATSO, as described in Appendix 2.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to CATSO'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 location of CATSO’s adopted Public Participation Plan.

As stated in the agency’s Public Participation Plan, “Public participation is critical element of transportation planning.” The Public Participation Plan provides the outline of CATSO’s procedures for ensuring open and effective communication with citizens in the Columbia area.

Goals of CATSO’s Public Participation Plan:

- Continuous improvement of two-way communications between CATSO, citizens, and stakeholders;
- Involvement of citizens in all stages of transportation planning and decision-making;
- Development of broad-based community support for transportation investment decisions.

Elements of CATSO’s Public Participation Plan:

- **Meetings:** CATSO’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. CATSO 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:** CATSO maintains a website at http://www.gocolumbiamo.com/community_development/planning/boards_and_commissions/catso/index.php, 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 CATSO’s programs and policies.

- Press releases: Press releases are routinely sent to news media in the region, when press coverage of specific events or decisions is warranted.
- Opportunities for public comment: CATSO 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 Columbia 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.
- Accessibility of staff: Staff is accessible in person, on the phone, by mail, by fax, by email, or by online comment forms. Contact information 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.
- Stakeholders: CATSO has identified numerous groups and organizations that are regarded as partners in transportation planning. Such stakeholders affect or are affected by transportation investment decisions. Identified CATSO stakeholders include:
 - Citizens
 - Minority and Low-income populations
 - Limited English Proficiency
 - Elderly, disabled, and persons with limited mobility
 - Transportation providers (public and private)
 - Local jurisdictions and public agencies
 - Private business and civic organizations

Opportunities for Public Comments

CATSO routinely offers three different ways for people to comment on activities, programs, and decisions made at the agency. These three 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 CATSO is included in all publications produced for CATSO. CATSO makes every effort to respond to all comments received.
- Citizen comments are requested at meetings: All CATSO 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 CATSO policies (such as the Public Participation Plan), and updates to CATSO’s Long-Range Transportation Plan (LRTP). The comment period is highlighted in via a legal notice, as well as other agency publications, on the CATSO

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. CATSO 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

CATSO 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, CATSO 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, CATSO 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, CATSO 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 CATSO's committee structure to include representation from Title VI relevant populations.

Program Area 2: Planning and Programming

CATSO is responsible for developing long and short-range transportation plans to provide efficient transportation services to the Columbia metropolitan area. A comprehensive transportation planning process is used, which entails the monitoring and collection of carried data pertaining to transportation issues. CATSO coordinates with MoDOT, Boone County, City of Columbia, and Columbia Transit System; seeks public involvement; and provides technical support when needed.

Operational Guidelines – Primary guidance is provided by:

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

Key Planning and Programming Activities

As the designated MPO for the Columbia region, CATSO 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:

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

Considerations of Title VI

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

- LRTP: The development of CATSO'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.

- Transportation Improvement Program (TIP): CATSO's four-year TIP will include an analysis of effects of planned transportation investments on disadvantaged residents.

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. 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 CATSO'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 planning 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

CATSO is responsible for selection, negotiation, and administration of its consultant contracts. CATSO operates under the City of Columbia's 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

CATSO's contract procedures are outlined in the "City of Columbia Purchasing Policy." CATSO staff verifies Title VI compliance by consultants (sub recipients 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 CATSO Requests for Proposals or Qualifications.

Title VI Responsibilities

Title VI responsibilities associated with consultant contracts include the following:

- Ensure inclusion of Title VI language in contracts, Requests for Proposals (RFP), and Requests for Qualifications (RFQ)
- 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 sub recipient is found to not be in compliance with Title VI, the Title VI Coordinator and relevant staff will work with the recipient or sub recipient 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 CATSO 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 CATSO staff on training programs regarding Title VI and related statutes.
- Ensure equal access to, and participation in, applicable NHI and NTI courses for qualified CATSO employees.
- Track staff participation in Title VI, NHI and NTI courses.

Questions

For questions on CATSO's Title VI Plan and Procedures, please contact the CATSO Title VI Coordinator at 573-874-7239 or by email at mms@gocolumbiamo.com. For information on CATSO's work programs or publications, please see the CATSO website.

LIMITED ENGLISH PROFICIENCY PLAN

Policy

It is the policy of the Columbia Area 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 Principle

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 CATSO if language assistance were not provided. CATSO is taking a number of steps, as outlined in this document, to assist LEP individuals in accessing CATSO's programs and services and is committed to improving access.

CATSO's Limited English Proficiency Population

According to Census American Community Survey 2010-2012 estimates, approximately 7.8% of persons (age 5+) in Boone County speak a language other than English at home; with Spanish (1.6%) the most used non-English language. This same data notes that of other language speakers, 2.7% speak English less than "very well."

The table below describes Boone County's population broken down by languages. Appendix 7 provides a table of the CATSO Metro Area's LEP population by Census Tracts using 2010-2012 ACS Data.

Subject	Boone County, Missouri					
	Total		Percent of specified language speakers			
	Estimate	Margin of Error	Speak English "very well"		Speak English less than "very well"	
			Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	155,660	+/-52	97.3%	+/-0.5	2.7%	+/-0.5
Speak only English	92.2%	+/-0.7	(X)	(X)	(X)	(X)
Speak a language other than English	7.8%	+/-0.7	65.4%	+/-5.1	34.6%	+/-5.1
Spanish or Spanish Creole	1.6%	+/-0.4	71.8%	+/-8.2	28.2%	+/-8.2
Other Indo-European languages	2.1%	+/-0.4	89.0%	+/-5.4	11.0%	+/-5.4
Asian and Pacific Island languages	2.8%	+/-0.3	42.9%	+/-9.4	57.1%	+/-9.4
Other languages	1.2%	+/-0.5	68.8%	+/-14.8	31.2%	+/-14.8
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish or Spanish Creole	2,534	+/-578	71.8%	+/-8.2	28.2%	+/-8.2
5-17 years	305	+/-179	84.6%	+/-18.5	15.4%	+/-18.5
18-64 years	2,075	+/-449	68.8%	+/-10.0	31.2%	+/-10.0
65 years and over	154	+/-113	86.4%	+/-20.4	13.6%	+/-20.4
Other Indo-European languages	3,272	+/-611	89.0%	+/-5.4	11.0%	+/-5.4
5-17 years	289	+/-153	86.9%	+/-15.0	13.1%	+/-15.0
18-64 years	2,637	+/-586	91.3%	+/-5.6	8.7%	+/-5.6
65 years and over	346	+/-169	73.1%	+/-20.4	26.9%	+/-20.4
Asian and Pacific Island languages	4,423	+/-540	42.9%	+/-9.4	57.1%	+/-9.4
5-17 years	535	+/-260	43.3%	+/-26.7	56.7%	+/-26.7
18-64 years	3,587	+/-408	43.3%	+/-10.6	56.7%	+/-10.6
65 years and over	301	+/-146	36.2%	+/-30.6	63.8%	+/-30.6
Other languages	1,858	+/-752	68.8%	+/-14.8	31.2%	+/-14.8
5-17 years	359	+/-269	67.4%	+/-28.2	32.6%	+/-28.2
18-64 years	1,465	+/-599	68.5%	+/-15.5	31.5%	+/-15.5
65 years and over	34	+/-42	100.0%	+/-61.5	0.0%	+/-61.5
CITIZENS 18 YEARS AND OVER						
All citizens 18 years and over	125,668	+/-708	98.9%	+/-0.3	1.1%	+/-0.3
Speak only English	95.6%	+/-0.6	(X)	(X)	(X)	(X)
Speak a language other than English	4.4%	+/-0.6	76.2%	+/-5.1	23.8%	+/-5.1
Spanish or Spanish Creole	1.4%	+/-0.3	76.0%	+/-8.1	24.0%	+/-8.1
Other languages	3.0%	+/-0.5	76.2%	+/-6.8	23.8%	+/-6.8
PERCENT IMPUTED						
Language status	2.4%	(X)	(X)	(X)	(X)	(X)
Language status (speak a language other than English)	1.3%	(X)	(X)	(X)	(X)	(X)
Ability to speak English	2.4%	(X)	(X)	(X)	(X)	(X)

Proposed Actions

As the agency responsible for coordinating the regional transportation planning process, CATSO 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 underrepresented population groups is part of the evaluations process. CATSO 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. CATSO 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 CATSO, 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.

CATSO 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, including staff of the Columbia Transit System, who speak a language other than English to provide points of contact for persons needing information.
- 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 CATSO's non-discrimination policies and information on the MPO website.

Identification of Language Translation Resources

MPO staff will continuously work with planning partners to identify language resources within the community. The University of Missouri, Columbia Public Schools, and Columbia Transit are all planning partners with staff and other resources to provide language translators. The University Health Care system has translator services available 24-7 (<http://muhealth.org/body.cfm?id=3482>), and the University has resources for international students, courses in many languages, and is a member of the American Translators Association which offers translation and interpretation services for interpretation and translation.

In 2014, Columbia Transit surveyed their staff to help determine the languages spoken by staff, willingness to serve as a translator, and frequency with which driver and non-drivers come into

contact with passengers who do not speak English or have trouble understanding English when it is spoken to them. The results are presented in the table below.

Columbia Transit LEP Survey Results:

Staff Surveyed	21 Employees (14 Drivers, 7 Non-Drivers)
Responses to Frequency of Contact with Passengers who do not speak English or have trouble understanding English when it is spoken to them	5 - Daily 6 - Weekly 6 – Monthly 4 – Less than Monthly
Responses to Languages Spoken (in no particular order)	Spanish, Chinese, Bosnian, Korean, American Sign Language, East Asian Language, Swedish, Vietnamese, Serbian, Croatian, Slovenian, African Language, Filipino (Tagalog), Middle Eastern, Persian (Farsi)
Responses to Translator Requests	Two (2) Columbia Transit employees identified as willing to serve as Translators and one (1) employee identified as maybe: <i>Adnan Halivovic</i> : Bosnian, Serbian, Croatian, Slovenian <i>Cesar Guevara</i> : Filipino (Tagalog) <i>Shannon Hemenway</i> : Spanish, French [maybe]

Columbia Public Schools provides resources to English Language Learners (ELL). For the 2013-2014 school year, there were 2013-14 = 1139 (936 active ELL/203 on monitor status). The number of ELL students has been growing over the past five years, and presently represent 5.5% of the student body. Working with CPS will allow CATSO staff to identify LEP trends and needs over time.

Of ELL students, 61 different languages are represented:

- Spanish = 287
- Arabic = 110
- Korean = 104
- Chinese = 83

Refugees = 110 students K-12 identified as refugees

ELL and other teachers offer a wealth of language and translation resources. CPS has 22 ELL teachers. Of the teachers who speak languages other than English:

- Spanish = 7
- French = 2
- Mandarin = 1
- German = 1
- Arabic = 1
- Two teachers are multilingual.

CATSO staff will continue to work with planning partners to identify and develop language resources within the community.

Staff Training

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

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, the Columbia Area Transportation Study Organization (CATSO) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: CATSO does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: CATSO will provide appropriate aids and services leading to effective communication for qualified persons with disabilities upon request and wherever possible, so they can participate equally in CATSO's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments. Additionally, materials on the CATSO website will adhere to the information technology guidelines outlined in Section 508 of the Rehabilitation Act. If you use assistive technology (such as a screen reader) and the format of any material on the CATSO site interferes with your ability to access the information, please contact the CATSO Title VI Coordinator, Mitch Skov, at 573-874-7243, for assistance.

Accessibility for those with Disabilities: The CATSO offices and Coordinating and Technical Committee Meetings are ADA Accessible. For information on the ADA accessible route to the CATSO offices and/or meeting locations, please contact the CATSO Title VI /ADA Coordinator, Mitch Skov, at 573-874-7243, or visit the web at: http://www.gocolumbiamo.com/community_development/planning/boards_and_commissions/catso/index.php

Modifications to Policies and Procedures: CATSO will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in CATSO offices, even where pets are generally prohibited.

Sign language interpreters or other auxiliary aid requests can be accommodated if requested in advance. Upon request, planning materials can be provided in alternative formats.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of CATSO should contact the CATSO Title VI Coordinator, Mitch Skov, at 573-874-7243. Persons who are hearing

impaired may contact the ADA Coordinator, Mitch Skov, at 573-874-7243 as soon as possible but no later than 48 hours before the scheduled event. A telecommunications device for the deaf (TDD) is available at 1-800-735-2966.

The ADA does not require CATSO to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. Complaints that a program, service, or activity of CATSO is not accessible to persons with disabilities should be directed to the CATSO Title VI /ADA Coordinator, Mitch Skov, at 573-874-7243.

CATSO will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

APPENDICES

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APPENDIX 1
CATSO Title VI Assurances

The CATSO 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 CATSO 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 CATSO 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 FTA 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: _____
Mike Matthes, Chair
Columbia Area Transportation Study Organization MPO

Part A
Department of Transportation Title VI Assurance

The CATSO (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 Columbia 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.

5. 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, sub grantees, 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.
6. 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, sub grantees, 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.

DATE: _____

Mike Matthes, Chair
Columbia Area Transportation Study Organization 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 Columbia 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 Columbia 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 Columbia 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 (5) 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 Columbia 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 Columbia MPO to enter into such litigation to protect the interests of the Columbia 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 and ADA Complaint Procedures
CATSO

Complaint Process:

The following informal and/or formal process will be utilized to resolve Title VI and Americans with Disabilities Act (ADA) complaints. Materials for filing a complaint can be provided in alternative formats for persons with disabilities by contacting the CATSO Title VI Coordinator at (573) 874-7239. Persons that are deaf or hard of hearing may contact CATSO through (573) 874-7239: TTD 1-800-735-2966. FAX # 573-874-7546. E-mail: planning@gocolumbiamo.com.

Informal:

With prior notice to the Title VI and ADA Coordinator, CATSO is encouraged to resolve Title VI and ADA issues internally. This can be achieved through informal means designed to satisfy the concerns of person(s) alleging a violation. If the issue has not been satisfactorily resolved through the informal process or if at any time the person requests to file a formal charge, the Title VI and ADA Coordinator will advise the complainant of the formal complaint process. A copy of all complaints received by CATSO should be forwarded to the Missouri Department of Transportation for review.

Formal:

1. Any person(s) or beneficiary who believes he or she has been denied the benefits of, excluded from participating in or otherwise subjected to discrimination because of race, color, religion, sex, age, familial status, disability, income, or national origin under any program or activity for which the CATSO is a recipient of federal assistance, may file a formal complaint in writing to CATSO, Title VI and ADA Coordinator, PO Box 6015, Columbia, MO 65205-6015.
2. CATSO will receive, investigate and attempt to resolve all Title VI and ADA complaints filed in writing within 180 calendar days after the date of the alleged act of discrimination.
3. Within five (5) calendar days after receiving a complaint, the Title VI and ADA Coordinator will send a written acknowledgement to the complainant and the appropriate member(s) of management, advising that the complaint will be investigated and that a copy of the complaint will be forwarded to the Missouri Department of Transportation.
4. Within thirty-five (35) calendar days after the receipt of the complaint, the Title VI Coordinator will complete an investigatory report. The report may include, but not be limited to the following:
 - a. Affidavit or statement by the complainant.
 - b. Affidavit or statement by any witnesses testifying on behalf of the complainant.
 - c. Affidavit or statement by the organization as to the facts at issue.
 - d. Affidavit or statement by any witnesses testifying on behalf of the organization.
 - e. Statement of position by the organization, together with any documents in support of that position.
 - f. Records and documents gathered in evidence from the organization or elsewhere that is relevant to the charge.

- g. Summary and recommendation(s).
- 5. Within five (5) days after receipt of the investigatory report, the Title VI and ADA Coordinator will determine whether the preponderance of the evidence supports CATSO or the allegations of the complainant. The report will be provided to the CATSO Chairperson for review, recommendation and signature. A notice of the recommendation will be provided to the complainant(s), respondent(s), and the Policy Board members. Within ten (10) days after receipt of the recommendation, both parties may submit information/documentation the Title VI and ADA Coordinator in support of their request for reconsideration of the recommendation. Upon review of the additional information/documentation, the Title VI and ADA Coordinator and CATSO Chairperson will have five (5) days to either reaffirm or reverse the original recommendation and provide written notice to the complainant, respondent, and the Policy Board members. If neither party requests reconsideration, the recommendation becomes final.
- 6. If the final recommendation or reconsideration supports the allegation(s), the Title VI and ADA Coordinator or designee will attempt to negotiate an amicable settlement of the issues in dispute. Formal, written settlement agreements will require the review of the organization's counsel prior to execution and will require the signatures of the parties, the Title VI and ADA Coordinator, and the CATSO Chairperson.
- 7. Confidentiality, to the extent feasible, shall be maintained during the formal and informal investigation process.
- 8. Investigation records will be maintained in accordance to applicable Federal guidelines, or in their absence, applicable state guidelines.

APPENDIX 3
Title VI Complaint Form
Columbia MPO

This form may be used to file a complaint with the CATSO based on purported violations of Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act of 1990. **You are not required to use this form; a letter that provides the same information is sufficient to file your complaint.** If you need assistance completing this form, please contact us by phone at 573-874-7243, or fax 573-874-7546.

Only the complainant or the complainant's designated representative must complete this form.

Name: _____
Address: _____
City: _____
State: _____
Zip: _____
Phone:
(Home) _____ (Work) _____ (Fax) _____

Individual(s) discriminated against, if different from above (use additional pages(s) if necessary).

Please explain your relationship to the individual(s) indicated above:

Agency Information

Agency and/or department name that discriminated: _____
Name of individual, if known: _____
City: State: Zip: _____
Phone:
(Home) (Work) (Fax) _____
Date(s) of alleged act: _____
Date discrimination began: _____
Last or most recent date of discrimination: _____
Waiver request: _____

Generally, complaints of discrimination must be filed within 180 days of the alleged discrimination. If the most recent date of discrimination, listed was more than 180 days ago; you may request a waiver of the filing requirement. [Example: Write you wish to request a waiver followed by an explanation of why you waited until now to file your complaint.]

Alleged discrimination:

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you or others by the agency or department indicated above, please indicate below the bases on which you believe these discriminatory actions were taken.

Example: If you believe that you were discriminated against because you are African American, you would mark the line labeled race/color and write African American in the space provided.

Example: If you believe the discrimination occurred because you are female, you would mark the line labeled sex and write female in the space provided.

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

Explain:

Please explain as clearly as possible what happened. Provide the name(s) of witnesses and others involved in the alleged discrimination. (Attach additional sheets if necessary and provide a copy of written materials pertaining to your case.)

Signature

Date

Note: The laws observed by this department prohibit retaliation or intimidation against anyone because the individual has either taken action or participated in action to secure rights protected by these laws. If you experience retaliation or intimidation separate from the discrimination alleged in this complaint or if you have questions regarding the completion of this form, please contact:

CATSO
Title VI/ADA Coordinator
701 East Broadway
Columbia, MO 65201
573-874-7239

APPENDIX 4
Public Participation Plan

CATSO's approved Public Participation Plan may be accessed at on the MPO website at:
http://www.gocolumbiamo.com/community_development/planning/boards_and_commissions/catso/PPPlan.php or you may contact the CATSO offices at 573-874-7239 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 Columbia MPO (CATSO) 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 CATSO 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 CATSO. Any such complaint must be in writing and filed with CATSO'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.gocolumbiamo.com/community_development/commission_archive/Commissions/CATSO/CATSOAccessibilityandTitleVIPlan.php

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

CATSO 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, see
http://www.gocolumbiamo.com/community_development/commission_archive/Commissions/CATSO/CATSOAccessibilityandTitleVIPlan.php or call 573-874-7239.

APPENDIX 6
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 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>

APPENDIX 7
CATSO Metro Area LEP Population by Census Tracts

LEP Population in Columbia Metropolitan Area by Census Tracts					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 2	Census Tract 3	Census Tract 5	Census Tract 6	Census Tract 7
Population 5 Years and Over	1,783	3,420	2,939	4,661	3,840
Speak English "less than very well"	6.7%	4.9%	16.6%	3.7%	9.5%
Spanish	18	102	41	163	388
% of Pop 5 & Over	1%	3%	1.4%	3.5%	10.1%
Speak English "less than very well"	55.6%	11.8%	26.8%	35.6%	63.1%
Other Indo-European	29	87	288	14	78
% of Pop 5 & Over	1.6%	2.5%	9.8%	.3%	2%
Speak English "less than very well"	41.4%	12.6%	37.8%	0%	0.0%
Asian and Pacific Island	127	148	504	89	29
% of Pop 5 & Over	7.1%	4.3%	17.1%	1.9%	0.8%
Speak English "less than very well"	77.2%	80.4%	73.2%	92.1%	55.2%
All Other	7	25	0	187	113
% of Pop 5 & Over	.4%	.7%		4%	2.9%
Speak English "less than very well"	0%	100%	0	18.2%	91.2%

LEP Population in Columbia Metropolitan Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 9	Census Tract 10.01	Census Tract 10.02	Census Tract 11.01	Census Tract 11.03
Population 5 Years and Over	1,389	4,008	6,071	7,841	6,268
Speak English “less than very well”	1.4%	1.3%	2.7%	3.4%	2.8%
Spanish	52	66	108	153	116
% of Pop 5 & Over	3.7%	1.6%	1.8%	2%	1.9%
Speak English “less than very well”	36.5%	0	33.3%	19.6%	17.2%
Other Indo-European	0	61	38	91	156
% of Pop 5 & Over		1.5%	.6%	1.2%	2.5%
Speak English “less than very well”	0	0	44.7%	27.5%	9.6%
Asian and Pacific Island	0	90	189	427	209
% of Pop 5 & Over		2.2%	3.1%	5.4%	3.3%
Speak English “less than very well”	0	32.2%	57.1%	45%	67%
All Other	5	46	0	56	125
% of Pop 5 & Over	.4%	1.1%		.7%	2%
Speak English “less than very well”	0	50%	0	32.1%	0

LEP Population in Columbia Metropolitan Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 11.04	Census Tract 12.01	Census Tract 12.02	Census Tract 13	Census Tract 14
Population 5 Years and Over	9,905	5,563	5,380	3,429	10,148
Speak English "less than very well"	.7%	3.2%	4%	5.2%	5.5%
Spanish	105	39	62	52	384
% of Pop 5 & Over	1.1%	.7%	1.2%	1.5%	3.8%
Speak English "less than very well"	0	53.8%	33.9%	34.6%	72.9%
Other Indo-European	184	346	349	240	335
% of Pop 5 & Over	1.9%	6.2%	6.5%	7%	3.3%
Speak English "less than very well"	8.2%	5.5%	16.9%	25.8%	47.5%
Asian and Pacific Island	166	162	191	383	208
% of Pop 5 & Over	1.7%	2.9%	3.6%	11.2%	2%
Speak English "less than very well"	24.1%	85.8%	59.7%	25.3%	55.3%
All Other	245	180	161	0	6
% of Pop 5 & Over	2.5%	3.2%	3%		.1%
Speak English "less than very well"	7.3%	0	11.8%	0	0

LEP Population in Columbia Metropolitan Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 15.02	Census Tract 15.03	Census Tract 15.04	Census Tract 16.01	Census Tract 16.02
Population 5 Years and Over	5,533	3,284	8,078	6,857	3,053
Speak English "less than very well"	2.3%	2.2%	6.2%	1.9%	1.3%
Spanish	73	35	76	301	88
% of Pop 5 & Over	1.3%	1.1%	.9%	4.4%	2.9%
Speak English "less than very well"	75.3%	48.6%	0	23.6%	27.3%
Other Indo-European	0	4	118	45	15
% of Pop 5 & Over		.1%	1.5%	.7%	.5%
Speak English "less than very well"	0	0	28%	0	0
Asian and Pacific Island	199	43	379	132	16
% of Pop 5 & Over	3.6%	1.3%	4.7%	1.9%	.5%
Speak English "less than very well"	9.5%	100%	49.1%	43.2%	100%
All Other	67	16	472	0	0
% of Pop 5 & Over	1.2%	.5%	5.8%		
Speak English "less than very well"	79.1%	68.8%	60.2%	0	0

LEP Population in Columbia Metropolitan Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 17.02	Census Tract 18.03	Census Tract 18.05	Census Tract 19.01	Census Tract 19.02
Population 5 Years and Over	4,249	4,084	7,795	3,969	7,528
Speak English "less than very well"	3.2%	.8%	3.1%	.4%	.1%
Spanish	91	57	47	26	20
% of Pop 5 & Over	2.1%	1.4%	.6%	.7%	2.2%
Speak English "less than very well"	69.2%	31.6%	0	61.5%	6.5%
Other Indo-European	165	9	342	8	148
% of Pop 5 & Over	3.9%	.2%	4.4%	.2%	2%
Speak English "less than very well"	43.6%	0	7.3%	0	7.4%
Asian and Pacific Island	8	25	334	15	0
% of Pop 5 & Over	.2%	.6%	4.3%	.4%	0
Speak English "less than very well"	0	64%	64.7%	0	0
All Other	32	0	0	0	0
% of Pop 5 & Over	.8%				0
Speak English "less than very well"	0	0	0	0	0

LEP Population in Columbia Metropolitan Area					
Population 5 years and over by language spoken at home and ability to speak English	Census Tract 21	Census Tract 22			
Population 5 Years and Over	3,227	7,157			
Speak English "less than very well"	3.7%	2.3%			
Spanish	88	85			
% of Pop 5 & Over	2.7%	1.2%			
Speak English "less than very well"	31.8%	9.4%			
Other Indo-European	58	178			
% of Pop 5 & Over	1.8%	2.5%			
Speak English "less than very well"	0	26.4%			
Asian and Pacific Island	92	103			
% of Pop 5 & Over	2.9%	1.4%			
Speak English "less than very well"	81.5%	61.2%			
All Other	61	67			
% of Pop 5 & Over	1.9%	.9%			
Speak English "less than very well"	24.6%	68.7%			

**APPENDIX 8
CATSO Metro Area Advisory Bodies**

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American		Total
Columbia Area Transportation Study Organization (CATSO)	100%					100%

Description of efforts made to encourage minority participation on committees:

Columbia Area Transportation Study Organization (CATSO): This commission is comprised of a Coordinating Committee (policy board) and a Technical Committee (advisory board). The Coordinating Committee is comprised of nine (9) members with the option for three (3) ex-officio members. The Technical Subcommittee is comprised of eleven (11) members with the option for four (4) ex-officio members. There is some overlap in that some people serve on both committees within CATSO. The membership is based on professional job positions held with various agencies in the community. CATSO’s member jurisdictions are all Equal Opportunity Employers.

APPENDIX 9: Sub Recipient Assistance

Sub recipient Assistance.

CATSO's Title VI Compliance Self-Survey Annual Report and Update, which is submitted annually in July to MoDOT is included in Appendix 11. Section VI of the Self-Survey Annual Report and Update compiles information on sub recipients of Federal Funds administered by the MPO:

As a sub recipient of the State, the MPO must submit a Title VI Program to the State. If it has sub recipients, the MPO must collect Title VI Programs from those sub recipients and monitor their compliance. The MPO shall include the schedule for sub recipient Title VI Program submission when it sends its own Title VI Program to the State.

At present, CATSO does not have any sub recipients.

APPENDIX 10: Equity Analysis of the Siting of Fixed Facilities

CATSO has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

APPENDIX 11: CATSO Title VI Compliance Self-Survey Annual Report and Update

COLUMBIA AREA TRANSPORTATION STUDY ORGANIZATION (CATSO)

TITLE VI COMPLIANCE SELF-SURVEY ANNUAL REPORT AND UPDATE

Date of report submittal:

Date prior year report submitted to MoDOT, FHWA and FTA:

Annual Report and Update: This Annual Report and Update is to be submitted by the end of July each year to MoDOT Division of External Civil Rights, the FHWA and the FTA. This document includes:

- c) Checklist of activities to be reviewed by the Title VI Coordinator and Staff prior to Completing the Annual Report and Update
- d) A report on the previous year's Title VI-related activities and efforts, including accomplishments and program changes.
- e) An update on Title VI-related goals and objectives for the upcoming year.
- f) Information on Sub recipients of Federal Funds administered by the MPO

Section I. Title VI Compliance- Checklist to be reviewed by Title VI Coordinator and Staff prior to completing the Annual Report and Update:

- Review Title VI laws and regulations for applicable changes since the more recent Title VI Plan update and annual report;
- Review CATSO's Title VI Plan to assure compliance with applicable Title VI regulations;
- Review CATSO's Title VI program, including agency operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate;
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to CATSO's Title VI program;
- 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;
- Review important Title VI-related issues with the CATSO Chair, if needed; **NA. Chair will be updated on necessary updates to Title VI Plan, as described below.**

- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups; address additional language needs if needed; and

- Update Title VI Plan, program, or procedures as needed. ***Necessary updates identified. Development of updated Title VI Plan anticipated in early FY2014. The Title VI Plan update will require review and approval by CATSO Coordinating Committee following a public hearing.***

Section II. Title VI-related activities and efforts, including accomplishments and program changes:

A. Summary of Title VI-Related Activities and Efforts

- Outreach, website, data dissemination: ***CATSO stakeholder list expanded and updated in March, 2013, with emphasis on the inclusion of groups with special or underserved transportation needs***
- Data updates: ***Ongoing***
 - Plan, program or policy changes: ***None in 2013; updates expected in 2014***

B. Summary of Complaints Received:

- Number of complaints received: ***0***
- Status of complaints: ***NA***

C. Accomplishments and Program Changes

- Accomplishments: ***Ongoing website updates for improved data availability and solicitation of public input; ADA-Accessible maps created and placed on website; revised verbiage in public hearing ads to identify translation and other accessibility enhancing services available to the public by request; maps developed to identify populations with special transportation needs; first submittal of Title VI Annual report in July of 2012; Updated stakeholder list in March of 2013***
- Program changes: ***NA; program changes are expected in FY2014 to reflect Title VI Program changes***

Section III. An update on Title VI-related goals and objectives for the upcoming year:

A. Prior year goals and objectives:

- 1) Ongoing website updates for improved data availability and solicitation of public input, 2) Ongoing updates of relevant base data, and 3) Further review of guidance***

received on new federal MAP-21 legislation and other relevant new federal information and revise the Title VI Plan to reflect these changes.

B. Title VI-related goals and objectives for the upcoming year:

Goals & Objectives for the next year include: 1) A revised Title VI Plan/Plan Update is anticipated in FY2014 to reflect changes or clarification of the Title VI program requirements as described by FTA Circular 4702.1B: Subject: TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS; 2) Ongoing website updates for improved data availability and solicitation of public input, 3) Ongoing updates of relevant base data; 4) submittal of the CATSO Title VI Annual Report to MoDOT in July of 2014; and 5) Ensure the 2040 update of the CATSO 2030 Long Range Transportation Plan (currently underway) adequately addresses Title VI requirements and goals

Section VI. Information on Sub recipients of Federal Funds administered by the MPO:

As a sub recipient of the State, the MPO must submit a Title VI Program to the State. If it has sub recipients, the MPO must collect Title VI Programs from those sub recipients and monitor their compliance. The MPO shall include the schedule for sub recipient Title VI Program submission when it sends its own Title VI Program to the State.

A. Sub recipients of Federal Funds: NA

B. For sub recipients, describe the compliance review schedule and include all sub recipients' Title VI program compliance submission: NA