



**Appendix 5:
LEP Plan**



A. Introduction & Background

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

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

The results of EWG’s Four Factor Analysis (see Part C) show, in part, that the Region has a very low, overall LEP population (at 2.1 percent) and that EWG has infrequent contact with LEP persons. Based on the results of the Four Factor Analysis, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis.

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

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

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

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B. The Data

The data used in this LEP Plan is taken from the U.S. Census Bureau’s (Census) 5-Year American Community Survey (ACS) for the period 2018 – 2022.² This is the most recent dataset available that includes all of the data that EWG needed to conduct its analysis. The data that EWG used in this LEP Plan include persons who speak English “less than very well,” which includes those persons who indicated to the Census that they speak English “less than very well,” “not well,” or “not at all.” This is consistent with the Federal Transit Administration’s (FTA) definition of LEP persons.³

C. Four Factor Analysis

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

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

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

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



This factor examines the persons eligible to be served or likely to be directly affected by EWG’s programs or activities. EWG’s service area is the Region. As a planning agency, EWG does not have daily interaction with LEP persons; rather, EWG’s interaction with LEP persons is limited to instances when the agency conducts a particular planning project for a community or neighborhood within the Region. Given this, EWG’s analysis focuses on identifying those areas within the Region that have highest concentrations of LEP persons. EWG uses this data to identify LEP communities that may be part of EWG’s

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

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

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

Based on EWG’s analysis, the Region has very few LEP persons (51,310 persons or 2.1 percent of the Region’s total population) and households (11,210 households or 1.1 percent of the Region’s total households). Most LEP persons live in the city of St. Louis (8,188 persons) or St. Louis County (28,253 persons). Table 12 summarizes the data for LEP persons and households. Map 11 shows the spatial distribution of LEP persons in the Region.⁴

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

		Persons Over 5	LEP Persons Over 5		Total Households	LEP Households	
		#	#	%	#	#	%
St. Louis Region		2,445,332	51,310	2.1	1,063,834	11,210	1.1
Illinois	Madison County	251,244	2,731	1.1	108,914	553	0.5
	Monroe County	32,995	157	0.5	13,565	29	0.2
	St. Clair County	241,354	3,565	1.5	100,701	411	0.4
Missouri	Franklin County	98,838	390	0.4	41,512	65	0.2
	Jefferson County	214,110	2,060	1.0	86,455	373	0.4
	St. Charles County	383,690	5,966	1.6	156,381	911	0.6
	St. Louis County	942,692	28,253	3.0	413,247	6,234	1.5
	City of St. Louis	280,409	8,188	2.9	143,059	2,634	1.8

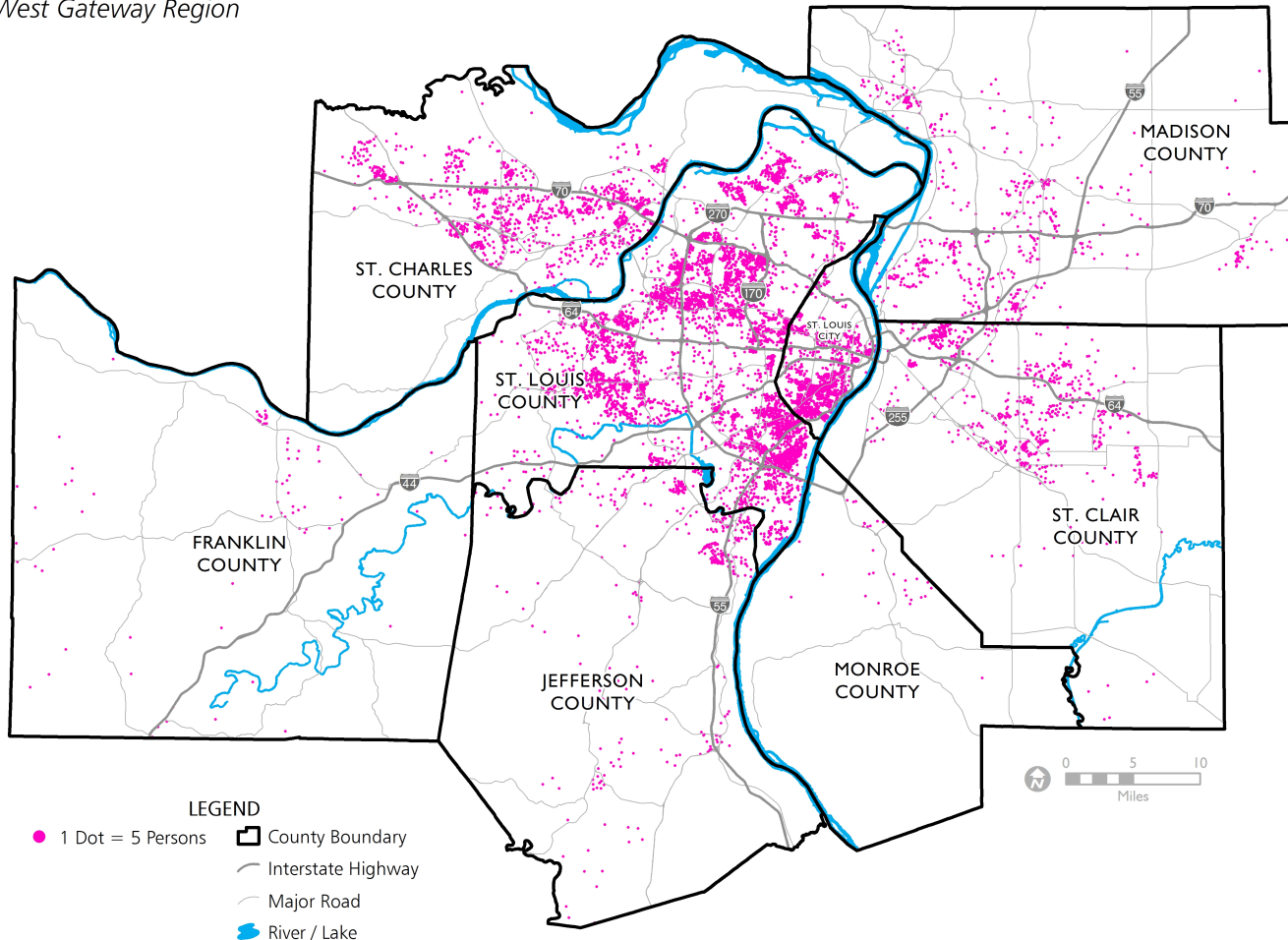
Source: U.S. Census 2022 5-Year American Community Survey, Tables B16004 and C16002

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

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

LEP Persons, 2018-2022

East-West Gateway Region



LEGEND

- 1 Dot = 5 Persons
- ▭ County Boundary
- Interstate Highway
- Major Road
- River / Lake

1 dot = 5 persons who speak English "less than very well".
 Dots are randomly placed within 2020 Census block groups.
 Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, American Community Survey
 5-Year Estimates (B16004), 2018-2022;
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Although EWG’s interaction with LEP persons is very limited,⁵ EWG’s analysis shows that, if the agency were to have contact with LEP persons, those persons are most likely to speak Spanish.

When examining the Region’s 51,310 LEP persons, there are three language groups that are the most common: Spanish, Russian, Polish, or other Slavic (Slavic), and Chinese (which includes Cantonese and Mandarin). Spanish, Slavic, and Chinese language speakers make up more than half (54.8 percent) of the Region’s LEP population with 28,100 people. These three language groups are also the only groups that make up more than 10 percent of the total LEP population (see Table 13a).

Nearly a third (30 percent) of the LEP population speaks Spanish. This represents 15,415 individuals, and is by far the largest LEP group in the Region. The next most common languages spoken by LEP persons are those in the Russian, Polish, or other Slavic language group. Slavic speaking LEP persons represent approximately 13 percent of all LEP persons; with a total of 6,792 persons.

Because of the importance of the Bosnian population to the Region, it is necessary to attempt to disaggregate the “Russian, Polish, or other Slavic languages” category reported by the Census into component parts. The Census changed the manner in which it reports data for this group between 2015 and later years’ surveys. In the 2015 data, the ACS reported separately on Russian and Serbo-Croatian, the latter of which made up approximately two-thirds of the Slavic-speaking LEP population. Since 2015, the Census Bureau has not reported specific languages spoken Slavic-speaking LEP individuals; however, the stability of the Slavic LEP population and low rate of international migration into the Region leads EWG staff to conclude that Bosnians speaking Serbo-Croatian continue to make up a majority of the total Slavic LEP population in the Region.

Speakers of the Mandarin or Cantonese Chinese languages make up the third largest category of the LEP population. The Census estimates that there are nearly 5,900 LEP speakers of Chinese languages in the Region, making up 11.5 percent of all LEP persons.

Although the Spanish, Slavic, and Chinese language groups represent the largest number of LEP residents, all of these groups make up a very low proportion of the Region’s total population – 0.6 percent for Spanish speaking LEP persons, 0.3 percent for speakers of Slavic languages, and 0.2 percent for Chinese speaking LEP persons (see Table 13b).

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

Bosnians in the St. Louis Region

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

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Table 13a shows 12 languages and language groups for which the ACS provides data. In the Region, nearly a third (30 percent) of the LEP population speaks Spanish. Slavic-speaking LEP persons represent approximately 13 percent of all LEP persons. Approximately 11.5 percent of the Region’s LEP population speaks Chinese languages.

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

	Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo-European languages	Vietnamese	Other Asian and Pacific Island languages	Other and unspecified languages	Arabic	Tagalog (incl. Filipino)	Korean	French, Haitian or Cajun	German or other West Germanic languages	
St. Louis Region	15,415	6,792	5,893	4,716	4,593	3,553	2,323	2,232	1,603	1,496	1,566	1,128	
Illinois	Madison County	1,488	128	278	122	129	83	168	8	64	84	95	
	Monroe County	97	0	4	0	35	7	0	0	14	0	0	
	St. Clair County	1,876	40	344	251	57	185	244	151	108	168	31	110
Missouri	Franklin County	97	8	0	51	4	2	7	0	11	50	20	140
	Jefferson County	471	659	103	274	31	161	44	27	122	43	78	47
	St. Charles County	2,563	376	488	551	587	460	108	56	348	174	121	134
	St. Louis County	6,747	4,822	4,009	2,652	2,533	2,146	916	1,568	671	839	784	566
	City of St. Louis	2,076	759	667	815	1,217	509	836	422	265	138	448	36
Percent of Regional LEP	30.0	13.2	11.5	9.2	9.0	6.9	4.5	4.4	3.1	2.9	3.1	2.2	

Source: US Census, 2022 5 Year American Community Survey, Table C16001

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Table 13b shows the percentage of the Region’s population represented by the LEP population’s different language groups. Spanish speakers with LEP represent 0.63 percent of the Region’s population over the age of five. The highest proportion of this population resides in the city of St. Louis (.74 percent). In no county does this group exceed one percent of the population. LEP speakers of Slavic languages all together comprise 0.28 percent of the Region’s population. In the city of St. Louis, the Slavic LEP population makes up just over one quarter of one percent of the population while, in Jefferson County, the Slavic LEP population makes up just over a third of one percent of the population, and in St. Louis County, the Slavic LEP population makes up over one half of one percent of the population. In no other county in the Region does this population exceed a quarter of one percent.

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

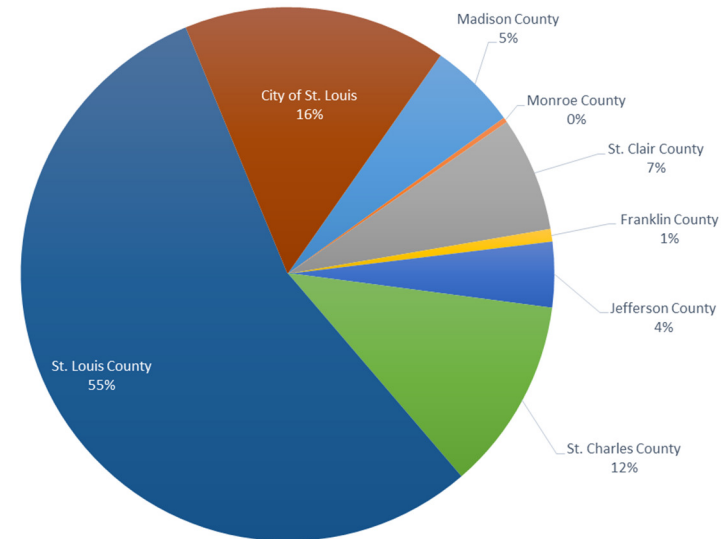
	Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo-European languages	Vietnamese	Other Asian and Pacific Island languages	Other and unspecified languages	Arabic	Tagalog (incl. Filipino)	Korean	French, Haitian or Cajun	German or other West Germanic languages
St. Louis Region	0.63	0.28	0.24	0.19	0.19	0.15	2.10	0.09	0.07	0.06	0.06	0.05
Illinois	Madison County	0.59	0.05	0.11	0.05	0.03	0.07	0.00	0.03	0.03	0.03	0.04
	Monroe County	0.29	0.00	0.01	0.00	0.11	0.02	0.00	0.04	0.00	0.00	0.00
	St. Clair County	0.78	0.02	0.14	0.10	0.02	0.08	0.10	0.06	0.04	0.07	0.01
Missouri	Franklin County	0.10	0.01	0.00	0.05	0.00	0.00	0.01	0.00	0.01	0.05	0.02
	Jefferson County	0.22	0.31	0.05	0.13	0.01	0.08	0.02	0.01	0.06	0.02	0.04
	St. Charles County	0.67	0.10	0.13	0.14	0.15	0.12	0.03	0.01	0.09	0.05	0.03
	St. Louis County	0.72	0.51	0.43	0.28	0.27	0.23	0.10	0.17	0.07	0.09	0.08
	City of St. Louis	0.74	0.27	0.24	0.29	0.43	0.18	0.30	0.15	0.09	0.05	0.16

Source: US Census, 2022 5 Year American Community Survey, Table C16001

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While the LEP persons who speak languages in the top three language groups are generally dispersed across the Region, the highest proportion of these LEP populations reside in the city of St. Louis, St. Charles County, and St. Louis County. St. Louis County has the largest proportion of Spanish, Slavic, and Chinese speaking LEP persons, at almost 55.4 percent or 15,578 persons. The city of St. Louis and St. Charles County have the next highest proportion with a little more than 12 percent of LEP persons falling within these groups (3,502 and 3,427 persons, respectively). As shown in Table 14, each county within EWG’s service area has at least some Spanish speaking LEP persons, while Slavic speaking and Chinese speaking LEP residents are largely concentrated in a few locations. For example, the city of St. Louis and St. Louis County have the highest proportion of the Region’s Slavic-speaking LEP persons, at 11.2 percent and 71 percent, respectively, and the highest proportion of the Region’s Chinese speaking LEP persons at 11.3 percent and 68 percent, respectively.

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



Source: U.S. Census, 2022, 5-Year American Community Survey Table C16001

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

	Spanish		Russian, Polish, or other Slavic Languages		Chinese (incl. Mandarin, Cantonese)		Total: Spanish, Slavic, Chinese		
	#	%	#	%	#	%	#	%	
St. Louis Region	15,415	100.0	6,792	100.0	5,893	100.0	28,100	100.0	
Illinois	Madison County	1,488	9.7	128	1.9	278	4.7	1,894	6.7
	Monroe County	97	0.6	0	0.0	4	0.1	101	0.4
	St. Clair County	1,876	12.2	40	0.6	344	5.8	2,260	8.0
Missouri	Franklin County	97	0.6	8	0.1	0	0.0	105	0.4
	Jefferson County	471	3.1	659	9.7	103	1.7	1,233	4.4
	St. Charles County	2,563	16.6	376	5.5	488	8.3	3,427	12.2
	St. Louis County	6,747	43.8	4,822	71.0	4,009	68.0	15,578	55.4
	City of St. Louis	2,076	13.5	759	11.2	667	11.3	3,502	12.5

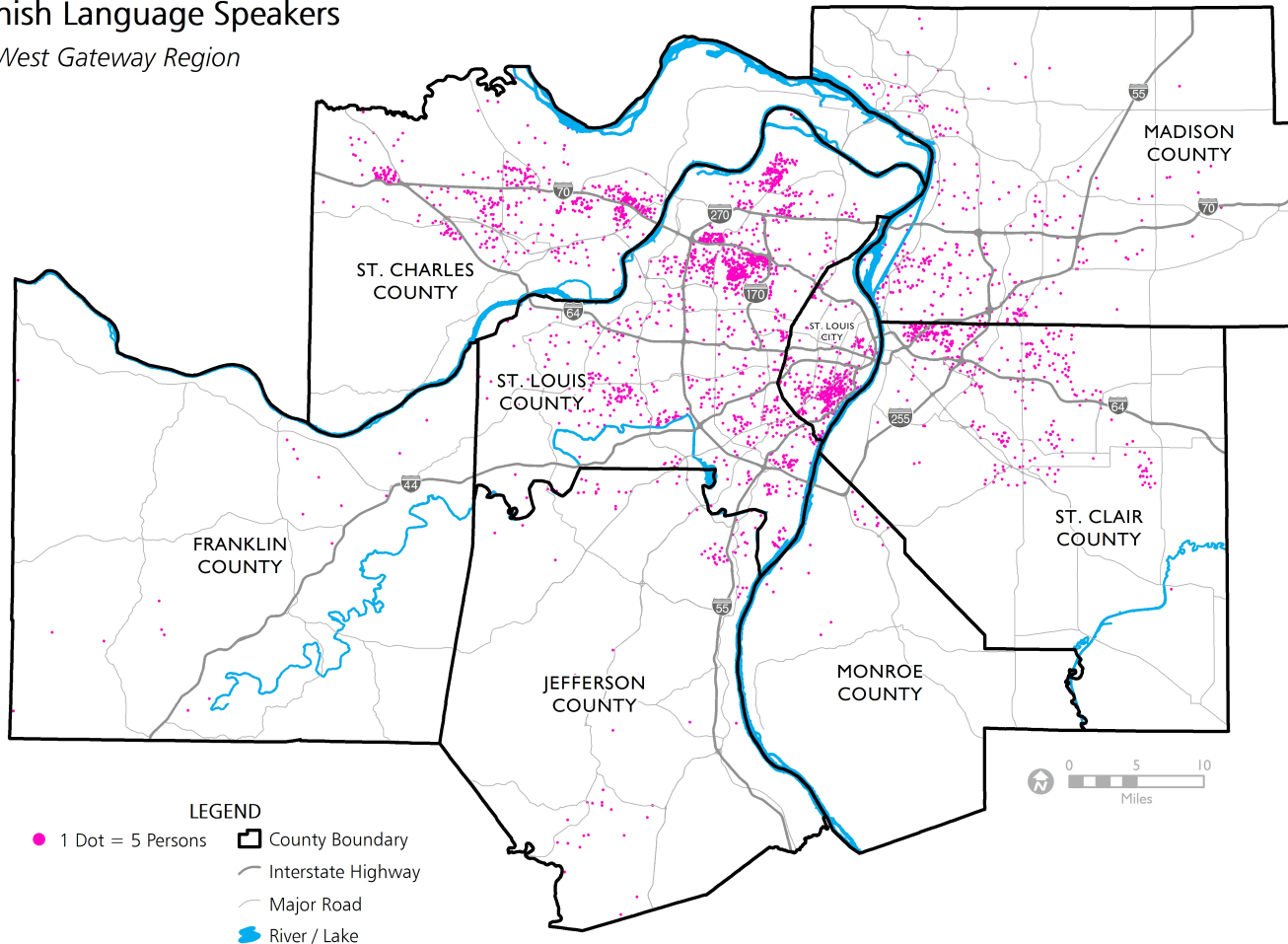
Source: US Census, 2022 5 Year American Community Survey, Table C16001

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

LEP Persons, 2018-2022

Spanish Language Speakers

East-West Gateway Region



1 dot = 5 persons who speak English "less than very well".
 Dots are randomly placed within 2020 Census tracts.
 Tract boundaries are not shown on the map.

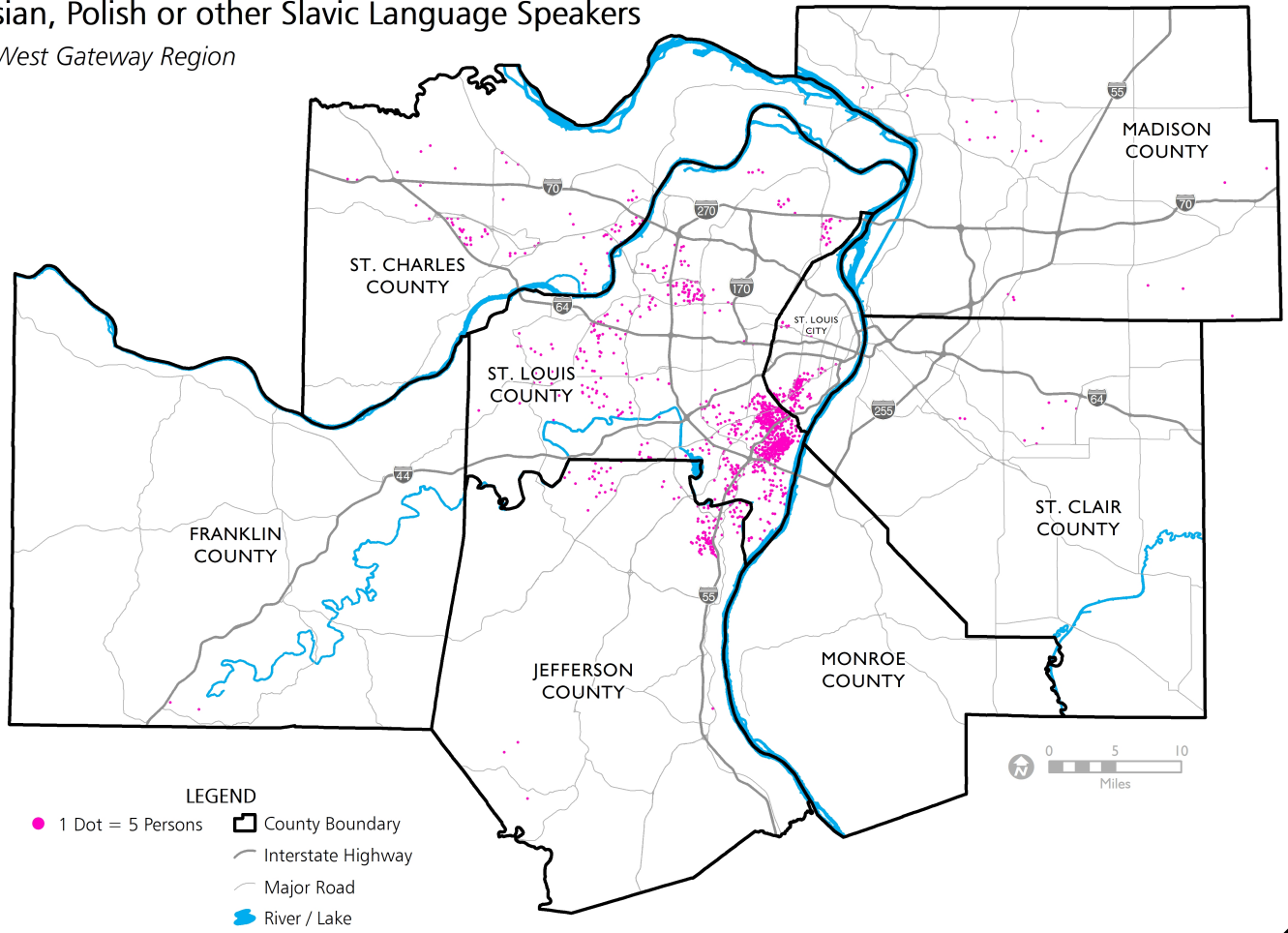
Sources: U.S. Census Bureau, American Community Survey
 5-Year Estimates (C16001), 2018-2022;
 East-West Gateway Council of Governments



LEP Persons, 2018-2022

Russian, Polish or other Slavic Language Speakers

East-West Gateway Region



- LEGEND**
- 1 Dot = 5 Persons
 - ▭ County Boundary
 - Interstate Highway
 - Major Road
 - River / Lake

1 dot = 5 persons who speak English "less than very well".
 Dots are randomly placed within 2020 Census tracts.
 Tract boundaries are not shown on the map.

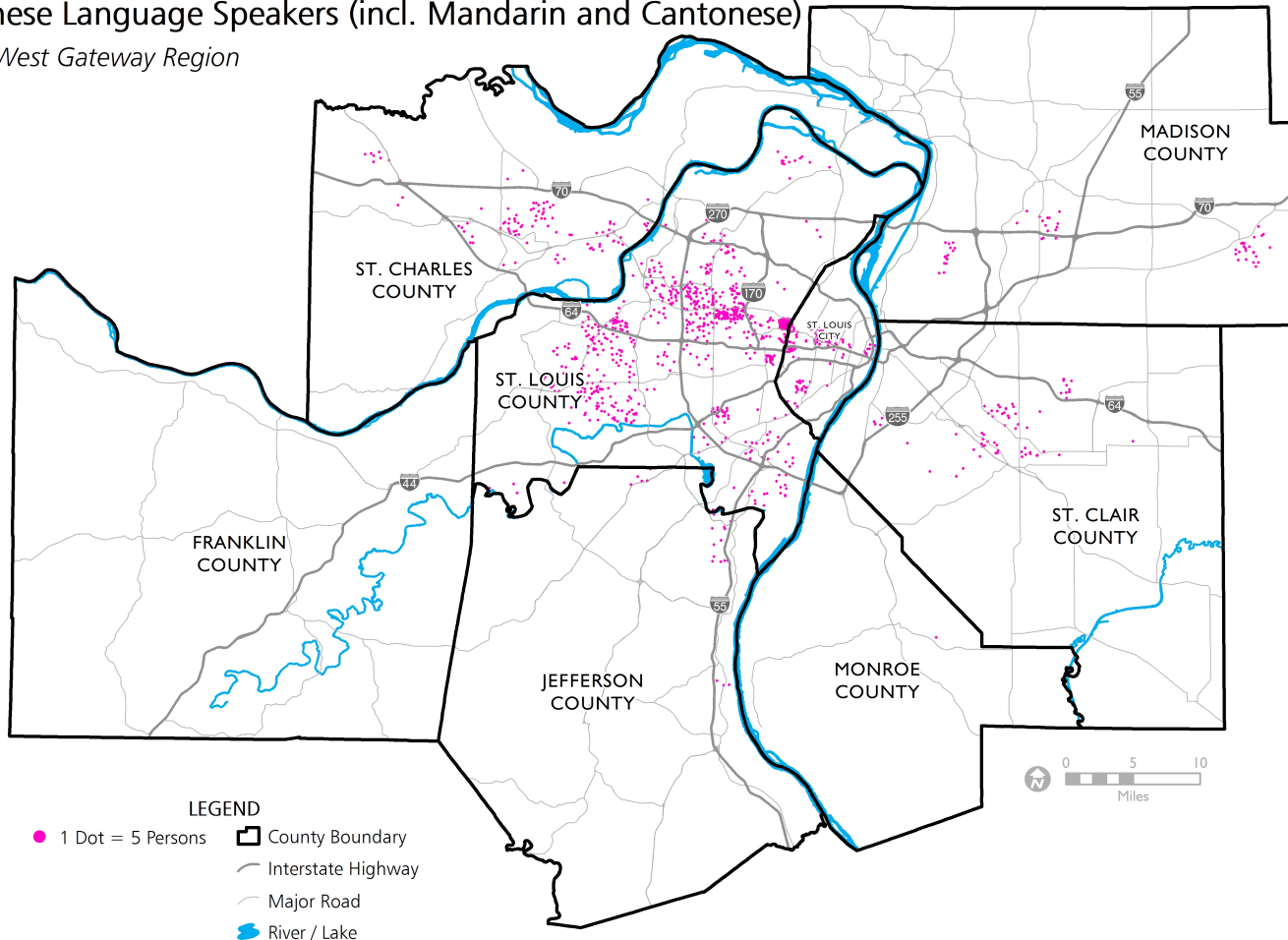
Sources: U.S. Census Bureau, American Community Survey
 5-Year Estimates (C16001), 2018-2022;
 East-West Gateway Council of Governments



LEP Persons, 2018-2022

Chinese Language Speakers (incl. Mandarin and Cantonese)

East-West Gateway Region



- LEGEND**
- 1 Dot = 5 Persons
 - ▭ County Boundary
 - Interstate Highway
 - Major Road
 - River / Lake

1 dot = 5 persons who speak English "less than very well".
 Dots are randomly placed within 2020 Census tracts.
 Tract boundaries are not shown on the map.



Sources: U.S. Census Bureau, American Community Survey
 5-Year Estimates (C16001), 2018-2022;
 East-West Gateway Council of Governments



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

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

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

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

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

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

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

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

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

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

In a typical year, EWG budgets \$15,000 - \$20,000 to produce significant agency documents (in English). These significant documents include: the Transportation Improvement Program (TIP) along with the Air Quality Conformity Determination and the Unified Planning Work Program (UPWP). EWG has other significant documents that are not produced or updated every year, such as the Long Range Transportation Plan (LRTP), *Where We Stand*, and the Coordinated Human Services Transportation Plan (CHSTP). EWG's significant documents are very lengthy and the cost to provide written translation of these documents is summarized in Table 15 below. Additionally, EWG conducts public outreach with respect to the planning process associated with the LRTP, TIP, and other projects. The cost to provide oral interpretation services at public outreach events is summarized in Table 16 below. The total cost to EWG for providing this type of outreach as a regular or automatic service exceeds EWG's available budget.

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

	Est. # of Words ²	Avg. Cost Per Word	Total Cost
TIP	97,206	\$0.18	\$17,740.10
Air Quality Conformity	59,068	\$0.18	\$10,779.91
UPWP	29,436	\$0.18	\$5,372.07
L RTP	69,656	\$0.18	\$12,712.22
<i>Where We Stand</i>	49,000	\$0.18	\$8,942.50
CHSTP	15,516	\$0.18	\$2,831.67
Hazard Mitigation Plan	85,000	\$0.18	\$15,512.50
Total Costs			\$73,890.97

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # CS211474001 through CS211474009.

¹ Written translation services are charged by the word and the price can range from \$.13 - \$.25 per word, depending on the organization providing the service (see Table 17 for a list of service providers). EWG used an average of the per word cost, which is \$.18. The costs above do not include the cost of having the translated documents formatted or edited, which would cost, between \$35 (flat rate) to \$65 / hour. *The number of words will vary from year-to-year based upon actual content.*

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

Table 16. Average¹ Cost of Oral Interpretation at Public Meetings

	Est. # of Hours	Avg. Cost Per Hour	Total Cost
L RTP	8	\$57.40	\$459.19
TIP & Air Quality Conformity	10	\$57.40	\$573.99
Other	10	\$57.40	\$573.99
Total Costs			\$1,607.17

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # CS211474001 through CS211474009.

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

D. Language Assistance Services

A recipient is responsible for determining the right mix of language assistance services based upon what is reasonable and necessary for the recipient after consideration of the results from the Four Factor Analysis. EWG's Four Factor analysis shows that the Region has a low, overall LEP population and that EWG has infrequent contact with LEP persons; therefore, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis. EWG is prepared at all times to respond to each request for language assistance and to provide reasonable access to EWG's programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents. Table 17 provides a list of organizations that can provide EWG these services.

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

In addition, EWG recognizes that the Region has certain areas with higher concentrations of LEP persons who may speak languages other than Spanish, so EWG has determined that it will take several low-cost or no-cost proactive steps to provide meaningful access to EWG's program, activities, and services to all LEP persons. These steps include:

- Utilizing bilingual EWG staff on an as-needed basis to assist during public outreach efforts or other interactions with LEP persons.
- Seeking the assistance of organizations that provide translation and interpretation services. EWG will use the State of Missouri Cooperative Procurement List to identify entities that provide these services.⁷
- Coordinating with other MPOs to share translated materials, such as informational notices.

⁷ The State of Missouri's Cooperative Procurement List can be found online at: <https://purch.oa.mo.gov/cooperative-procurement-program>.

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- Working with local groups, citizens, and businesses that represent or work with LEP persons in order to identify appropriate strategies that EWG can use to reach LEP persons, as well as provide opportunities for those who represent LEP interests to participate in regional decision making by serving on advisory groups and citizen panels.
- Continuing to monitor the demographic characteristics of the Region in order to identify changes in the LEP population that may necessitate a change to EWG’s LEP Plan.

Table 17. Language Assistance Providers*

Language Interpreter – Verbal (\$50 / hour)	
All Access Interpreters LLC St. Louis, MO (314) 259-1010	All Access Interpreters LLC St. Louis, MO (314) 259-1010
International Institute of Metropolitan St. Louis St. Louis, MO (314) 773-9090	International Institute of Metropolitan St. Louis St. Louis, MO (314) 773-9090
Bi-Lingual International Assistant Services St. Louis, MO (314) 645-7800	Bi-Lingual International Assistant Services St. Louis, MO (314) 645-7800
Language Translation – Written (\$.18 / word; \$65 / hour for editing and formatting)	
Bilingual International St. Louis, MO (314) 645-7800	JR Language Translation Services Inc. St. Louis, MO (585) 270-6704
International Institute Business Solutions Center St. Louis, MO (314) 773-9090	Global Village St. Louis, MO (314) 989-9112

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

E. Monitoring, Evaluating & Updating the LEP Plan

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

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

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

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

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

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

F. Staff Training

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

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

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