Limited English Proficiency Plan

Capital Area Metropolitan Planning Organization

Adopted February 19, 2014

The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Highway Administration, and Federal Transit Administration in cooperation with the Missouri Department of Transportation. The opinions, findings, and conclusions expressed in this report are not necessarily those of the Federal Highway Administration, Federal Transit Administration, or the Missouri Highway and Transportation Department.

Individuals should contact the ADA Coordinator at (573) 634-6570 to request accommodations or alternative formats as required under the Americans with Disabilities Act. Please allow three business days to process the request.

CAMPO Title VI Nondiscrimination Policy

The Capital Area Metropolitan Planning Organization is committed to the policy that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity on the grounds of race, color, sex, age, disability or national origin, in accordance with Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259).

MPO Administration is provided by the City of Jefferson, Missouri
Department of Community Development/Planning Division
Room 120 John G. Christy Municipal Building
320 East McCarty Jefferson City, Missouri
Telephone 573-634-6410
www.jeffcitymo.org/campo

Table of Contents

Resolution 4

Introduction 6

Elements of an Effective LEP Policy 6

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy 6

The Four-Factor Analysis 7

- Factor 1: The Proportion, Numbers and Distribution of LEP Persons 7
- Factor 2: Frequency of Contact with LEP Individuals 10
- Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community 10
- Factor 4: The Resources Available to the MPO and Overall Cost 10

Safe Harbor Stipulation 11

Providing Notice to LEP Persons 12

Options & Proposed Actions 12

- Options: 12

What the MPO will Do? What actions will the MPO take? 14

- MPO Staff Training 14
- Inclusion in the Public Participation Plan 14
- LEP Plan Access 14

Appendix A - Executive Order 13166 16

NEW Resolution to replace the above old one

Introduction

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency[1], to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. For details see Appendix A.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.[2] These individuals are referred to as being limited English proficient, or "LEP."

> 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.

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance **recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided.**

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance. **Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.**

The Capital Area Metropolitan Planning Organization receives planning funds from the US Department of Transportation via the Federal Highway Administration and Federal Transit Administration.

The US Department of Transportation published *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Person* in the December 14th, 2005 Federal Register.[3]

The guidance explicitly identifies MPOs as organizations that must follow this guidance:

---

[1] The executive order verbatim and can be found online at http://www.usdoj.gov/crt/cor/Pubs/eolep.htm.

[2] Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 (Volume 70, Number 239)

[3] The DOT has also posted an abbreviated version of this guidance on their website at http://www.dotcr.ost.dot.gov/asp/lep.asp.

> The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.

To assist the MPO and Jefferson City in meeting Title VI and Limited English Proficiency requirements of the Federal Highway Administration and the Federal Transit Administration, the Capital Area Metropolitan Planning Organization is conducting an evaluation on what activities would be appropriate for compliance with Limited English Proficiency requirements for the MPO.

Elements of an Effective LEP Policy[4]

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP persons who need language assistance
2. Identifying ways in which language assistance will be provided
3. Training staff
4. Providing notice to LEP persons
5. The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the USDOT.

These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

The DOT guidance outlines **four factors** recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the MPO and overall cost.

---

[4] http://www.lep.gov/resources/lep_aug2005.pdf

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

The DOT guidance is modeled after the Department of Justice's guidance and requires recipients and subrecipients to take steps ensure meaningful access to their programs and activities to LEP persons. More information for recipients and subrecipients can be found at http://www.lep.gov.

The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above.[5] Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to public transit services within the MPO area. Recommendations are then based on the results of the analysis.

Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all.' For planning purposes, CAMPO is considering people that speak English 'not well' or 'not at all' as Limited English Proficient persons.

Table 1 shows the number and percent of persons in regards to their English Language skills for the municipalities and portions of counties within the CAMPO Metropolitan Planning Area.

As seen in Table 1, less than one percent of the combined population of Callaway and Cole Counties speaks English 'not well' or 'not at all.' Map 1 shows the distribution of non-English speaking people within CAMPO's boundaries. There are few LEP persons residing in Callaway County portion of the metropolitan planning area. In Cole County, by comparison, there are more areas with LEP persons. There is a cluster of LEP persons within the City of Jefferson, primarily located in the central city, as well as a large cluster on the western side of CAMPO's boundaries, between Jefferson City and St. Martins.

[5] Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 (Volume 70, Number 239)

Table 1: Limited English Proficient Persons in the MPO Planning Area and local jurisdictions [6]

	Population 5 years old and older	Number of Limited English Proficient Persons	Percent of Limited English Proficient Persons
City of Jefferson	40,152	87	0.22%
Holts Summit	3,000	11	0.37%
St. Martins	1,040	0	0%
Lake Mykee	321	3	0.94%
Taos	1,165	0	0%
Wardsville	1,525	0	0%
Entirety of Cole County	71,005	416	0.59%
Entirety of Callaway County	41,472	93	0.22%

Of the LEP persons in Callaway County, sixty two percent (62%) speak Spanish at home. Around twenty nine percent (29%) of LEP persons speak Asian and Pacific Languages (such as Chinese, Korean, Japanese, and others) at home. Approximately nine percent (9%) of Callaway County LEPs speak other languages at home.

Of the LEP persons in Cole County, seventy eight percent (78%) speak Spanish at home. seven percent (7%) of LEP persons speak an Indo-European language (such as Urdu, Hindi, Portuguese, Bengali, Russian, Persian, and German) at home. Around nine percent (9%) of LEP persons speak Asian and Pacific Languages (such as Chinese, Korean, Japanese, and others) at home. Approximately six percent (6%) of Callaway County LEP persons speak other languages at home.

Tables 2 and 3 shows the actual numbers of language groups spoken by LEP persons at home, within Callaway and Cole Counties, respectively.

Table 2: Language spoken at home by Limited English Proficient Persons in Callaway County

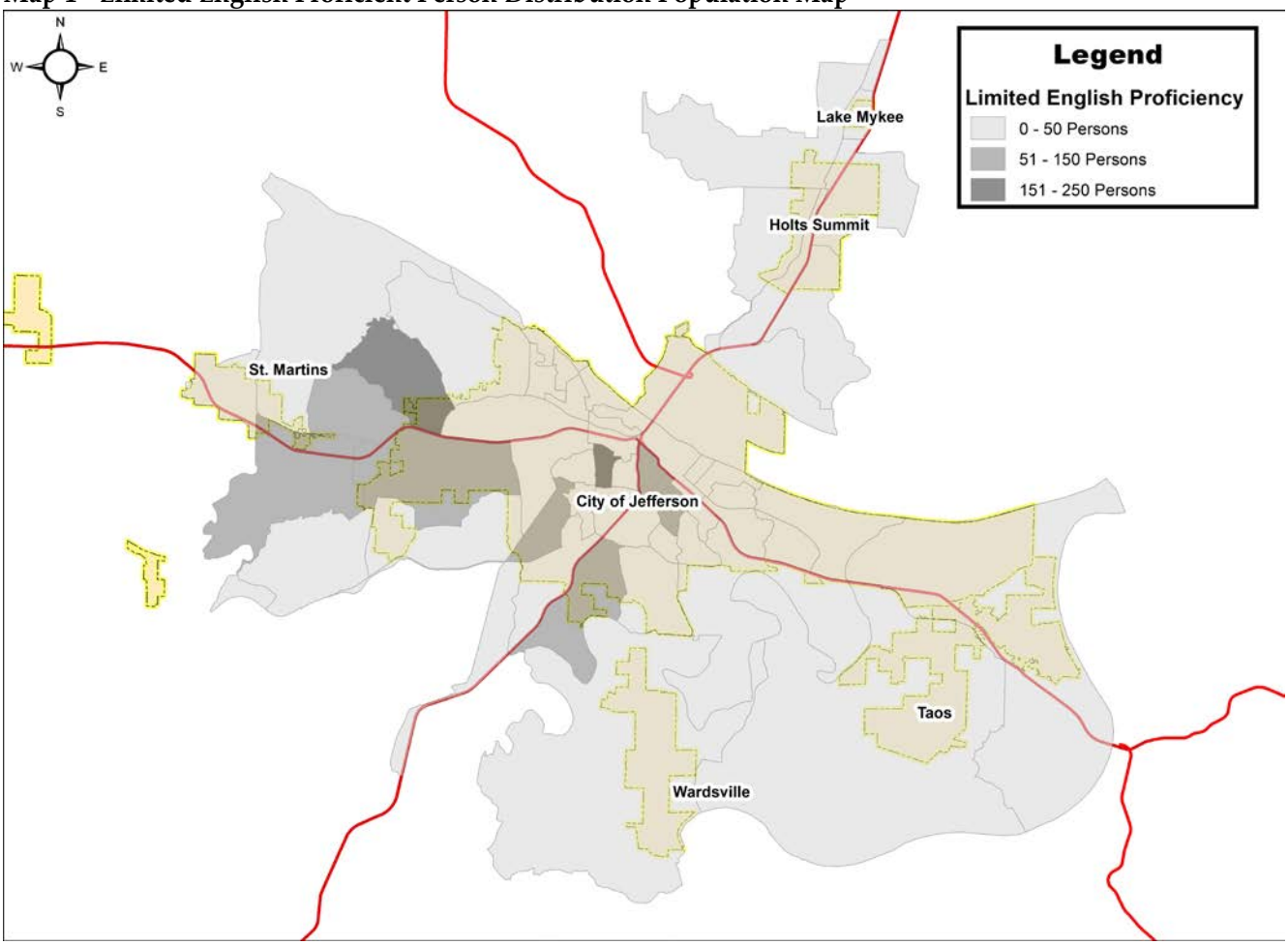
	Spanish Language Spoken at Home	**Indo-European Language Spoken at Home**	**Asian and Pacific Islander Language Spoken at Home**	**Other Language Spoken at Home**
5-17 years old	7	0	0	0
18-64 years old	51	0	27	8
65 and older	0	0	0	0
Total	**58**	**0**	**27**	**8**

[6] **Tables 1, 2, and 3 are derived from Table B16004 (AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over) from the 2008-2012 American Community Survey, US Census Bureau.**

Table 3: Language spoken at home by Limited English Proficient Persons in Cole County

	Spanish Language Spoken at Home	Indo-European Language Spoken at Home	Asian and Pacific Islander Language Spoken at Home	Other Language Spoken at Home
5-17 years old	93	0	0	0
18-64 years old	171	30	38	23
65 and older	61	0	0	0
Total	**325**	**30**	**38**	**23**

Map 1 - Limited English Proficient Person Distribution Population Map[7]



[7] Map 1 is derived from Table B16004 (AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over) from the 2008-2012 American Community Survey, US Census Bureau.

Factor 2: Frequency of Contact with LEP Individuals

The Capital Area Metropolitan Planning Organization was officially formed in May, 2003, as a result of classification of the Jefferson City area as 'urbanized' by the US Census Bureau in 2002. Traditionally, MPO open houses and workshops have been located in areas where LEP persons reside. In Callaway County the MPO meetings have been held in the census block group with the most LEP persons. In Cole County, the meetings were held in a census block group with one of the highest concentrations of LEP persons.

MPO staff was surveyed and it was found that no contact with any LEP individual has occurred at any public involvement meetings, other public meetings, or in day to day activity since the MPO was formed. However, member organizations have reported contact with LEP individuals, primarily by JEFFTRAN.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community

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

CAMPO's main function is to support cooperative, comprehensive, and continuing transportation planning as outlined in federal transportation acts. In doing so, CAMPO develops three main documents – the Metropolitan Transportation Plan (or Long Range Transportation Plan), Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP), and as needed, other studies. The Metropolitan Transportation Plan provides direction for transportation investments out to 20 years in the future. The TIP is a program or schedule of short-range transportation improvements and activities intended to be implemented through a combination of State, Federal and local funding. The UPWP outlines tasks to be performed in the upcoming year.

Denial or delay of access to services or information provided by CAMPO would not have life-threatening implications on a LEP individual. It is also believed that denial or delay of access to services or information provided by CAMPO would not have serious implications on a LEP individual, especially compared to the services, such as health, emergency transportation, water, sewer, fire protection, police protection and other emergency services, provided by CAMPO member organizations.

Factor 4: The Resources Available to the MPO and Overall Cost

US Department of transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan.

While CAMPO does serve few LEP persons and has very limited resources, it has been decided to include a LEP section in the Public Involvement Plan with the acknowledgement that current demographic trends indicate the number of LEP persons may increase within the MPO planning area. Funds available for LEP services would be derived entirely from existing CAMPO operating funds, and compete with other operational requirements of the MPO. CAMPO's total budget is less than $190,000 a year, or less than $3.00 per capita.

Since all members of CAMPO are required to adhere to Presidential Executive Order 13166, it is reasonable that utilization of member organizations' LEP resources is a preferred option for the MPO.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

No LEP language groups in the CAMPO planning area constitutes the 5% or 1,000 persons of population threshold for which written translations of vital documents can be provided meet the safe harbor standard. However, given the small number of LEP language group members, the CAMPO budget and the number of staff, it is deemed that written translations of core documents would be so burdensome as to defeat the legitimate objectives of CAMPO programs. It is more appropriate for CAMPO to precede with oral interpretation options for compliance with LEP regulations.

Providing Notice to LEP Persons

USDOT LEP guidance says:

> Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.

The guidance provides several examples of notification including:

1. Signage when free language assistance is available with advance notice.
2. Stating in outreach documents that language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individual of the recipient's services, including the availability of language assistance services.
4. Using automated telephone voice mail attendant or menu which can provide information about available language assistance services and how to get them.
5. Including notices in local newspapers in languages other than English
6. Providing notices on non-English-language radio and television states about the available language assistance services and how to get them.
7. Providing presentations and/or notices at schools and religious organizations.

The MPO will provide statements in public information and public notices, as outlined in CAMPO's Public Participation Plan, that persons requiring language assistance or special accommodations will be provided, with reasonable advance notice to the MPO.

Options & Proposed Actions

Options:

Federal fund recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.[8]

CAMPO is defining an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.[9]

---

[8] https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance

[9] Department of Justice Final LEP Guidelines, Federal Register June 18, 2002 – Vol. 67 – Number 117.

Considering the relatively small scale of the MPO in Jefferson City, 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. Many options were discussed and considered by CAMPO staff.

- The United States Census Bureau has created a way to quickly identify the language that a limited English proficiency speaker uses through their 'I Speak' cards. These cards are short and easily duplicated, making them a valuable tool to begin an initial conversation with a limited English proficiency speaker.[10]
- Relay Missouri - "TTY users can type in Spanish and the conversation will be relayed in Spanish. TTY users can also request Spanish to English or English to Spanish translation via relay. To make a Spanish Relay call, dial 800.520.7309 and instruct the Relay Missouri operator how you want your call translated."[11]
- Using community volunteers. This option could be used where advanced notice is provided that translator services would be required. A list of volunteers would need to be developed. Examples might include El Puente or the Jefferson City Multicultural Forum. [12]
- Research a number of universities within thirty miles that have foreign language academics and/or departments. Among these are Lincoln University (Spanish and French) in the City of Jefferson, Westminster College (Spanish, French, and German) in Fulton, University of Missouri (Spanish, French, Italian, and Portuguese) in Columbia.
- Development of written translation and oral interpreter service providers database. Several interpretation services are under State of Missouri contracts that provide for cooperative purchasing.
- Google Translate works with several written languages. Once the language of the LEP is identified, this is a free service by Google that may be relatively easy to communicate with, when internet and electronic devices are available.
- There is a listing of certified interpreters from the Missouri Court System for reference.[13] These interpreters are able to listen to oral comments made in languages other than English and translating them in-person to CAMPO staff as well as the reverse.
- Ensure CAMPO members are aware of the USDOT LEP guidance and support their LEP planning activities, as appropriate.
- Revisit the plan when events (2020 decennial census or other indication of increase of LEP persons) warrant.

---

[10] http://www.lep.gov/ISpeakCards2004.pdf

[11] http://www.donthanguponrelay.com/relaymo-services/spanish-relay

[12] http://elpuentemo.org/ and http://woodsgroup.wix.com/jcmcf

[13] http://www.courts.mo.gov/file.jsp?id=7378

What the MPO will Do. What actions will the MPO take?

With advance notice of seven calendar days, the MPO will provide interpreter services at the Technical Committee and Board of Directors meetings, through the City of Jefferson, as administrator for the MPO. Interpreter to include foreign language, and hearing impaired. The MPO will utilize a database of interpreters, primarily but not exclusively based on the State Office of Administration cooperative purchasing agreement for translation services and verbal interpretation.

Placement of statements in notices and publications that interpreter services are available for these meetings, with seven calendar days advance notice.

Publication of MPO and federal complaint forms on the website, available at public meetings, and reference to these forms on what they are for and where to get them, in the LEP and Public Participation Plans.

Notices of the MPO non-discrimination policies and information on the local and federal complaint process will be placed on the website and available in public meetings.

As of the writing of this update (Winter 2014), the CAMPO website, as part of an upgrade of the City of Jefferson's website, is expected to be updated within the year. One of the improved upgrades is to be the inclusion of Google Translate whose function is to take the entire webpage and changes the language without disturbing the format or graphics.

MPO Staff Training

MPO staff will take advantage of training when available on the requirements for providing meaningful access to services for LEP persons.

Inclusion in the Public Participation Plan

The MPO will include a Limited English Proficiency policy in the updates of the MPO Public Participation Plan through 1) statements and notices that interpreters will be provided, upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact database for interpretation providers**.**

LEP Plan Access

The MPO will post the LEP Plan on its website at www.jeffcitymo.org/campo

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, the Callaway County and Cole County libraries offer free internet access. Copies of the LEP Plan will be provided to the each MPO member organization, the Missouri Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy.

In addition, copies may be read in person by visiting CAMPO via the City of Jefferson and asking staff for a copy. Under certain circumstances, physical copies may be given to interested parties.

Any questions or comments regarding this plan should be directed to the CAMPO staff.

Appendix A - Executive Order 13166

THE WHITE HOUSE

Office of the Press Secretary
(Aboard Air Force One)

For Immediate Release August 11, 2000

EXECUTIVE ORDER

13166

IMPROVING ACCESS TO SERVICES FOR
PERSONS WITH LIMITED ENGLISH PROFICIENCY

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

Section 1. Goals.

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

Sec. 2. Federally Conducted Programs and Activities.

Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the

LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities. Agencies shall develop and begin to implement these plans within 120 days of the date of this order, and shall send copies of their plans to the Department of Justice, which shall serve as the central repository of the agencies' plans.

Sec. 3. Federally Assisted Programs and Activities.

Each agency providing Federal financial assistance shall draft title VI guidance specifically tailored to its recipients that is consistent with the LEP Guidance issued by the Department of Justice. This agency-specific guidance shall detail how the general standards established in the LEP Guidance will be applied to the agency's recipients. The agency-specific guidance shall take into account the types of services provided by the recipients, the individuals served by the recipients, and other factors set out in the LEP Guidance. Agencies that already have developed title VI guidance that the Department of Justice determines is consistent with the LEP Guidance shall examine their existing guidance, as well as their programs and activities, to determine if additional guidance is necessary to comply with this order. The Department of Justice shall consult with the agencies in creating their guidance and, within 120 days of the date of this order, each agency shall submit its specific guidance to the Department of Justice for review and approval. Following approval by the Department of Justice, each agency shall publish its guidance document in the Federal Register for public comment.

Sec. 4. Consultations.

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

Sec. 5. Judicial Review.

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

WILLIAM J. CLINTON

THE WHITE HOUSE,
August 11, 2000.

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