

CAMPO

Title VI Program

**Approved by the CAMPO Board of Directors on
February 19, 2014**

CAMPO
Department of Planning and Protective Services
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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 Department of Transportation.

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RESOLUTION 2014-02

A RESOLUTION OF THE CAPITAL AREA METROPOLITAN PLANNING ORGANIZATION ADOPTING THE TITLE VI PROGRAM

WHEREAS, the Federal Transit Administration requires recipients to report certain general information to determine compliance with Title VI; and

WHEREAS, the collection and reporting of this information constitutes a recipient's Title VI Program; and

WHEREAS, to ensure compliance with 49 CFR Section 21.9 (b), the FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to the FTA's regional civil rights officer once every three years.

WHEREAS, the Capital Area Metropolitan Planning Organization, as subrecipients, submits the information contained in this plan to the Missouri Department of Transportation; and

WHEREAS, the plan has been developed in accordance with requirements of the Federal Transit Administration; and

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Capital Area Metropolitan Planning Organization that the Title VI Program for the Jefferson City, Missouri metropolitan planning area is hereby approved and adopted.

Adopted this 19th day of February, 2014.



Jeff Hoelscher, Chairman

Attest:



Anne Stratman, Administrative Assistant

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Introduction

The Federal Transit Administration requires recipients to report certain general information to determine compliance with Title VI. The collection and reporting of this information constitutes a recipient's Title VI Program. To ensure compliance with 49 CFR Section 21.9 (b), the FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to the FTA's regional civil rights officer once every three years. As subrecipients, the Capital Area Metropolitan Planning Organization (CAMPO) submits the information contained in this plan to their primary recipient, MoDOT, on a schedule to be determined by the primary recipient, and is to be included as part of their Title VI Program.

This report is provided as in compliance with Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1B, titled "VI Requirements And Guidelines For Federal Transit Administration Recipients", dated October 1, 2012.

Organization

The Capital Area Metropolitan Planning Organizations (CAMPO) is the designated metropolitan planning organization for the Jefferson City, Missouri Urbanized Area whose purpose is to carry out a continuing, cooperative, and comprehensive long range transportation planning process.

CAMPO is comprised of a Board of Directors composed of elected and appointed officials from Holts Summit, St. Martins, Jefferson City, Callaway County, Cole County, selected state agencies, and Federal transportation representatives serving as ex-officio members; and a Technical Committee that consists of representatives from the agencies' professional staffs and acts in an advisory capacity.

A memorandum of understanding between members identifies the City of Jefferson as the administrator of CAMPO, and as such, provides staffing for CAMPO. The City of Jefferson provides staff consisting of two full time transportation planners. The City also provides part time support from the Director of Planning and Protective Services and an Administrative Assistant. The City Counselor has been designated as the Title VI Coordinator for the City of Jefferson.

Program Requirements Applicable to CAMPO

The following checklist derived from FTA Circular 4702.1B Chapter III, Chapter VI and from Appendix A has been edited to denote required elements included in this program. If an element is not required or included in this plan, an explanation is provided.

General Requirements (Chapter III) Checklist

- Title VI Annual Certifications and Assurances.
 - Included.
- Title VI Notice to the Public, including a list of locations where the notice is posted
 - Included.
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
 - Included.
- Title VI Complaint Form
 - Included.
- List of transit-related Title VI investigations, complaints, and lawsuits
 - Note included, no investigations, complaints or lawsuits have occurred.
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
 - Included.
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
 - Included
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
 - Included
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
 - Not Included, Not Applicable - CAMPO is not a primary recipient, but a subrecipient.
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
 - Not Included, Not Applicable – CAMPO does not construct facilities.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
 - Included.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)
 - Included are requirements from Chapter VI – Requirements of MPOs

Requirements of MPOs (Chapter VI) Checklist

- All requirements set out in Chapter III (General Requirements)
 - Included – see above.
- The requirements set out in Chapter IV (Transit Provider) if the MPO is a provider of fixed route public transportation
 - Not Included, not applicable – CAMPO does not provide any transportation.
- Demographic profile of the metropolitan area
 - Included.
- A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
 - Included.
- Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
 - Maps and charts are included.
- Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts
 - Included.
- Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)
 - Not Included, Not Applicable – CAMPO is not a primary recipient.
- Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)
 - Not Included, Not Applicable – CAMPO is not a primary recipient.
- Title VI Compliance Report Submission Process
 - Included.

General Requirements (Chapter III)

Title VI Annual Certification and Assurances

See Appendix A - Title VI Annual Certification and Assurances and Appendix B - Metropolitan Transportation Planning Process Certification.

where CAMPO offices are located. At meetings and other activities not at the CAMPO office, notices are made available to the public.

**Capital Area Metropolitan
Planning Organization**



Room 120, 320 E. McCarty St., Jefferson City, MO 65101 Phone: 573.634.6410 Fax: 573.634.6457

CAMPO Title VI Notice

**Notifying the Public of Rights Under Title VI
Capital Area Metropolitan Planning Organization**

- CAMPO operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with CAMPO.
- For more information on the CAMPO's civil rights program, and the procedures to file a complaint, please visit our website at www.jeffcitymo.org/ppls/campo/TitleVIpage.html or contact the Title VI Program Officer by calling (573) 634-6570 or (573) 634-6304 .
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.

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.

Title VI Complaint Procedures

Complaint Procedures may be found in Appendix C. They are posted on the website, <http://www.jeffcitymo.org/ppls/campo/TitleVIpage.html>, as well as made available at public meetings. FHWA and CAMPO Title VI brochures are available on the website and at public meetings that explain Title VI and outline the complaint procedure.

Title VI Complaint Form

The Complaint Form may be found in Appendix D. They are posted on the website, as well as made available at public meetings.

List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

None involving CAMPO.

Public Participation Plan

Since last Title VI Program submission CAMPO has conducted two major planning activities, a Metropolitan Transportation Plan (long range transportation plan) and Coordinated Public Transportation Human Services Transportation Plan (CPTHSTP). For the MTP, advertisements in two local newspapers at two different times. For the CPTHSTP community organizations which represented minority, disabled, impoverished, and other protected classes were invited to participate in planning activities.

The regularly scheduled monthly Technical Committee and Board of Directors meetings are posted on the website and notices sent to local municipal and county buildings for public posting.

The Public Participation Plan may be found in Appendix E.

Language Assistance Plan

The Limited English Proficiency Plan may be found in Appendix F. An update, which integrates new Census information, as well as modifying CAMPO actions to support those who speak English less than well, is currently being updated and going through the review process.

Requirements of MPOs (Chapter VI)

Committee Membership

CAMPO has two non-elected committees or councils, the Board of Directors and Technical Committee. The Board of Directors is comprised on elected officials and department directors from member jurisdictions, the number of which is based on population. Membership is not selected by CAMPO, the recipient, but appointed by the member organizations themselves. Likewise, the Technical Committee is comprised of engineering, planning, and administrative professionals from member jurisdictions, the number of which is based on population. Similar to the Board of Directors, membership is not selected by the recipient, but appointed by the member organizations themselves. Both groups also have ex-officio members appointed by various organizations, not selected by CAMPO.

The only member of a group selected by CAMPO is the private/freight transportation representative for the Technical Committee and he is a Caucasian middle aged male.

Demographic Profile of the Metropolitan Area

Table 1, below, shows the populations for various municipalities found within the CAMPO planning area, as well as unincorporated areas. Within the CAMPO Metropolitan Area, has a fairly diverse population,

in terms of race/ethnicity. Table 2 shows the racial and ethnic make-up of various municipal, county, and area that make up part or all of the metropolitan planning area.

Table 1 - CAMPO 2010 Decennial Census Demographics by Jurisdiction

	Total Population	Metropolitan Planning Area Population		Adjusted Urban Area Population		Census Designated Urban Area Population	
		Persons	Percent	Persons	Percent	Persons	Percent
City of Jefferson (Cole County)	43,057	43,057	59.80%	43,057	72.08%	42,785	73.10%
St. Martins	1,140	1,140	1.58%	1,140	1.91%	1,063	1.82%
Taos	878	878	1.22%	0	0.00%	0	0.00%
Wardsville	1,506	1,506	2.09%	0	0.00%	0	0.00%
Unincorporated Cole County		18,507	25.71%	10,696	17.91%	10,048	17.17%
City of Jefferson (Callaway County)	22	22	0.03%	22	0.04%	0	0.00%
Holts Summit	3,247	3,247	4.51%	3,247	5.44%	3,108	5.31%
Lake Mykee	350	350	0.49%	350	0.59%	350	0.60%
Unincorporated Callaway County		3,290	4.57%	1,220	2.04%	1,179	2.01%
Totals		71,997	100.00%	59,732	100.00%	58,533	100.00%

Source: U.S. Bureau of the Census

Table 2 – Racial and ethnic makeup of Callaway and Cole Counties, Municipalities within those counties and the CAMPO Metropolitan Planning Area

	Total	One Race						Two or More Races	Hispanic
		White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other		
Callaway County	44,332	40,778	2,032	217	245	17	201	842	707
Cole County	75,990	64,137	8,512	242	966	46	667	1,420	1,795
City of Jefferson	43,079	33,581	7,263	141	755	25	333	959	1,103
City of Holts Summit	3,247	2,991	128	10	15	2	33	68	73
Village of Lake Mykee	350	339	2	0	3	0	0	6	5
City of St. Martins	1,140	1,087	13	3	8	0	11	18	14
City of Taos	878	867	0	4	2	0	0	5	9
City of Wardsville	1,506	1,471	9	5	4	5	0	12	7
CAMPO MPA	71,997	60,022	8,613	240	957	46	685	1,426	1,855

Source: U.S. Bureau of the Census

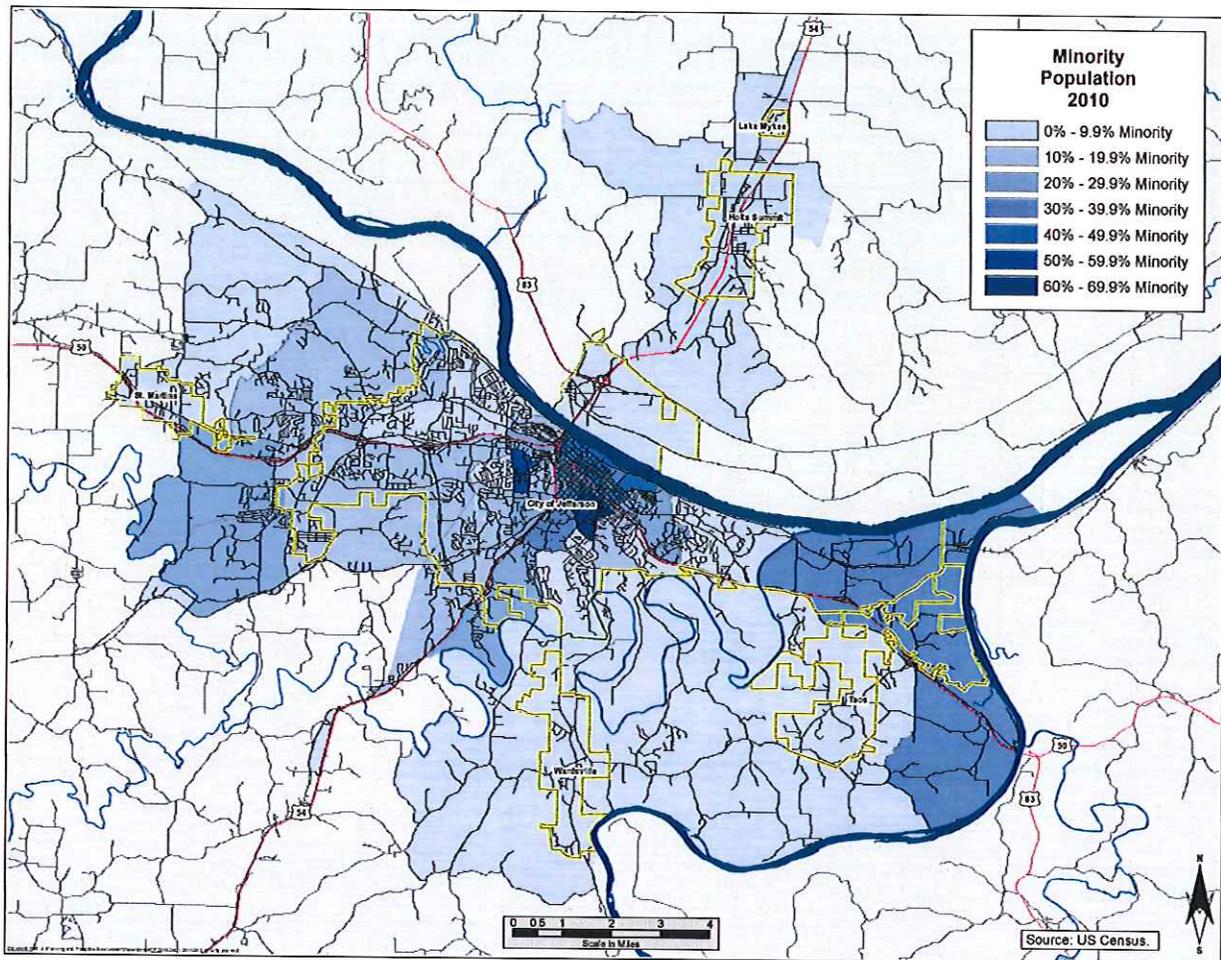
Minority Populations

For purposes of Title VI and Environmental Justice, who is considered to be a “Minority”? The U.S. DOT Order (5610.2) on Environmental Justice defines “Minority” and provides clear definitions of the four (4) minority groups addressed by the Executive Order. These groups are:

- Black (a person having origins in any of the black racial groups of Africa).
- Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race).
- Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands).
- American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition).

Map 1, located below, shows the distribution of minority population within the CAMPO MPA, as relating to Census Block Groups.

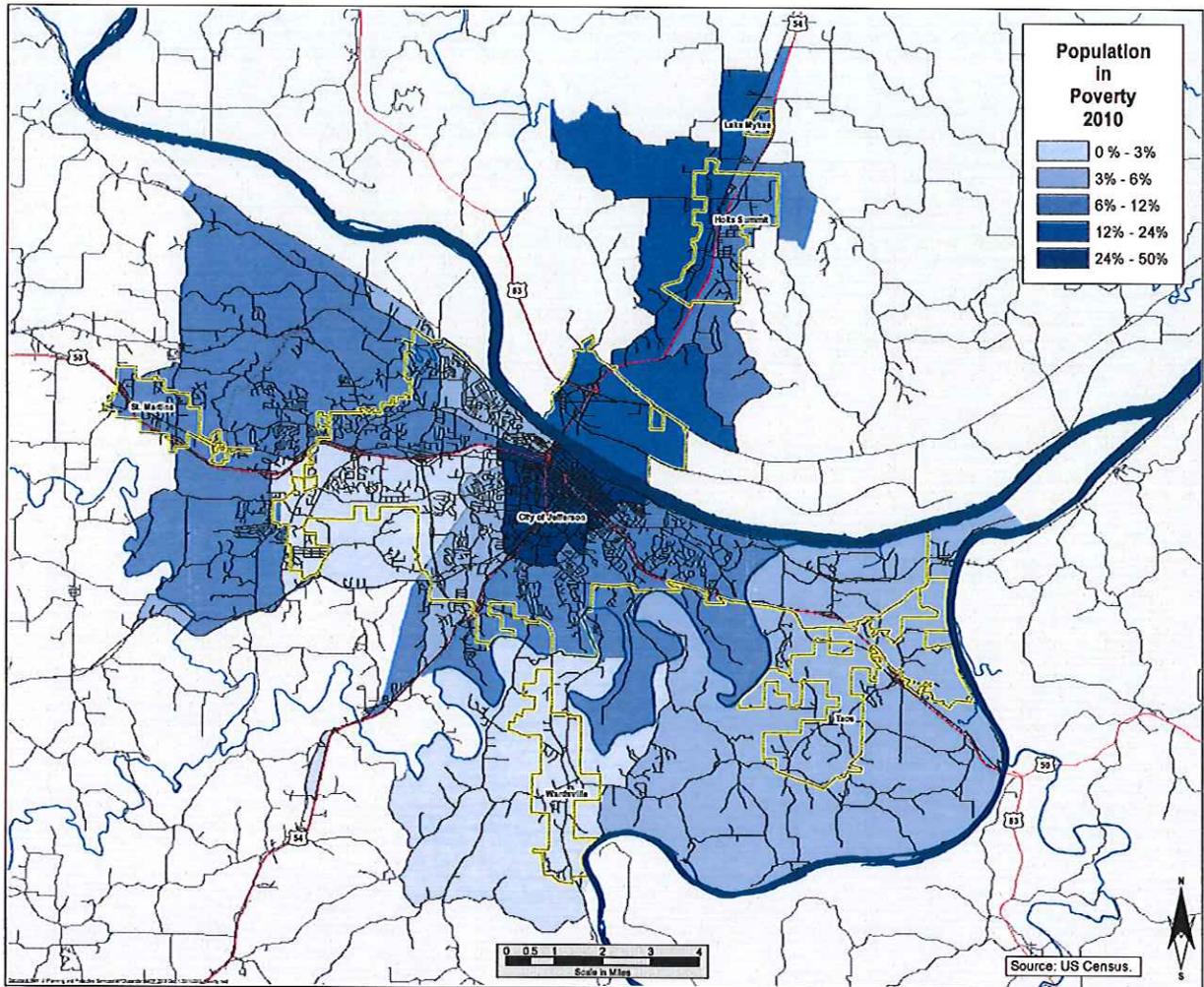
Distribution of Minority Populations by Census Block Group.



There are hardly any minorities living in Holts Summit or Lake Mykee. The core of Jefferson City is densely populated with minority populations.

Map 2 shows how the income is distributed with the CAMPO metropolitan planning area.

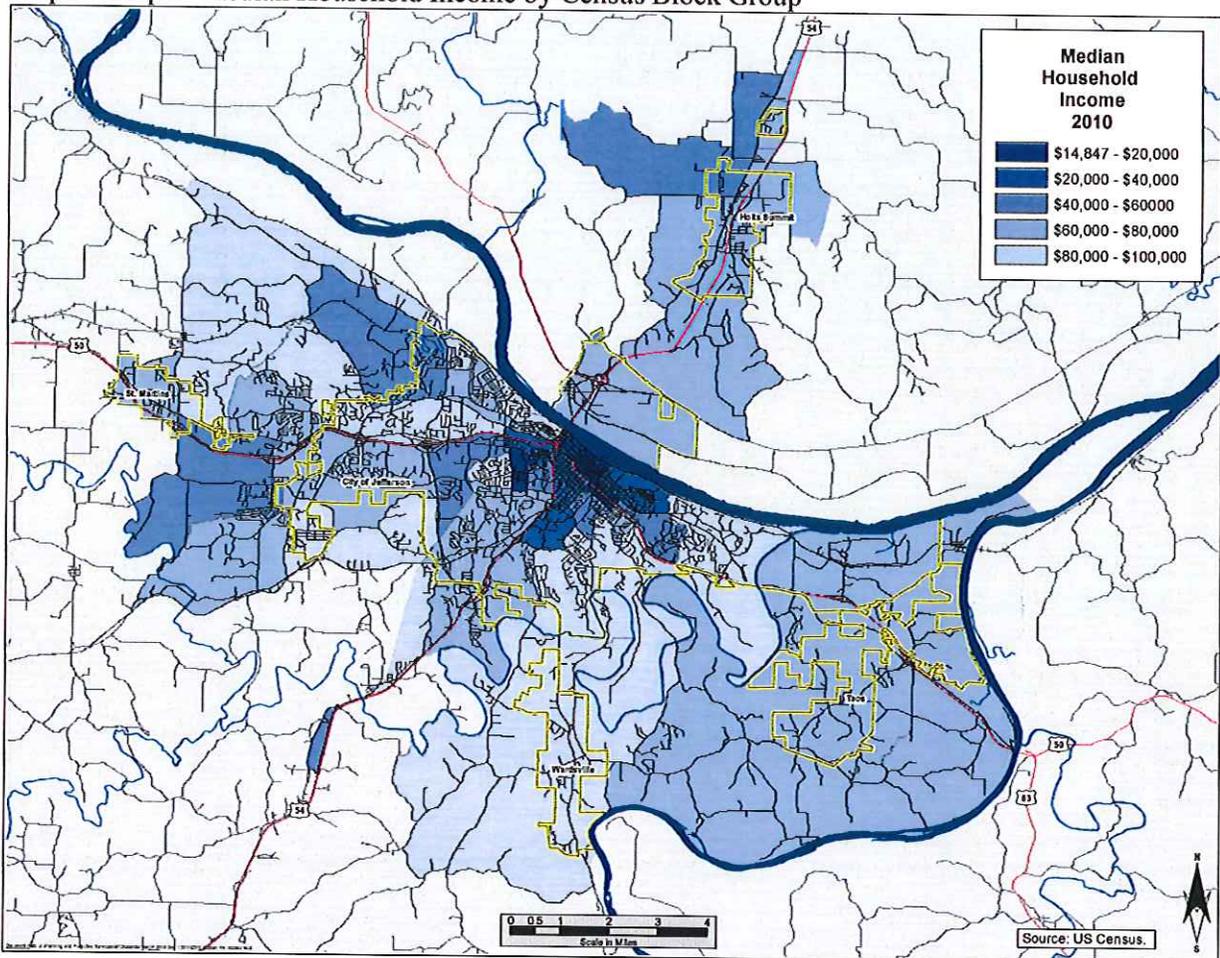
Map 2 - Income Distribution



As Map 2 shows, an estimate based on the U.S. Census Bureau, 2006-2010 American Community Survey indicates 7,605 persons (10.6%) in the CAMPO Planning Area were below poverty income level in past 12 months, in 2010.

Map 3, shown below, focuses on median household income distribution.

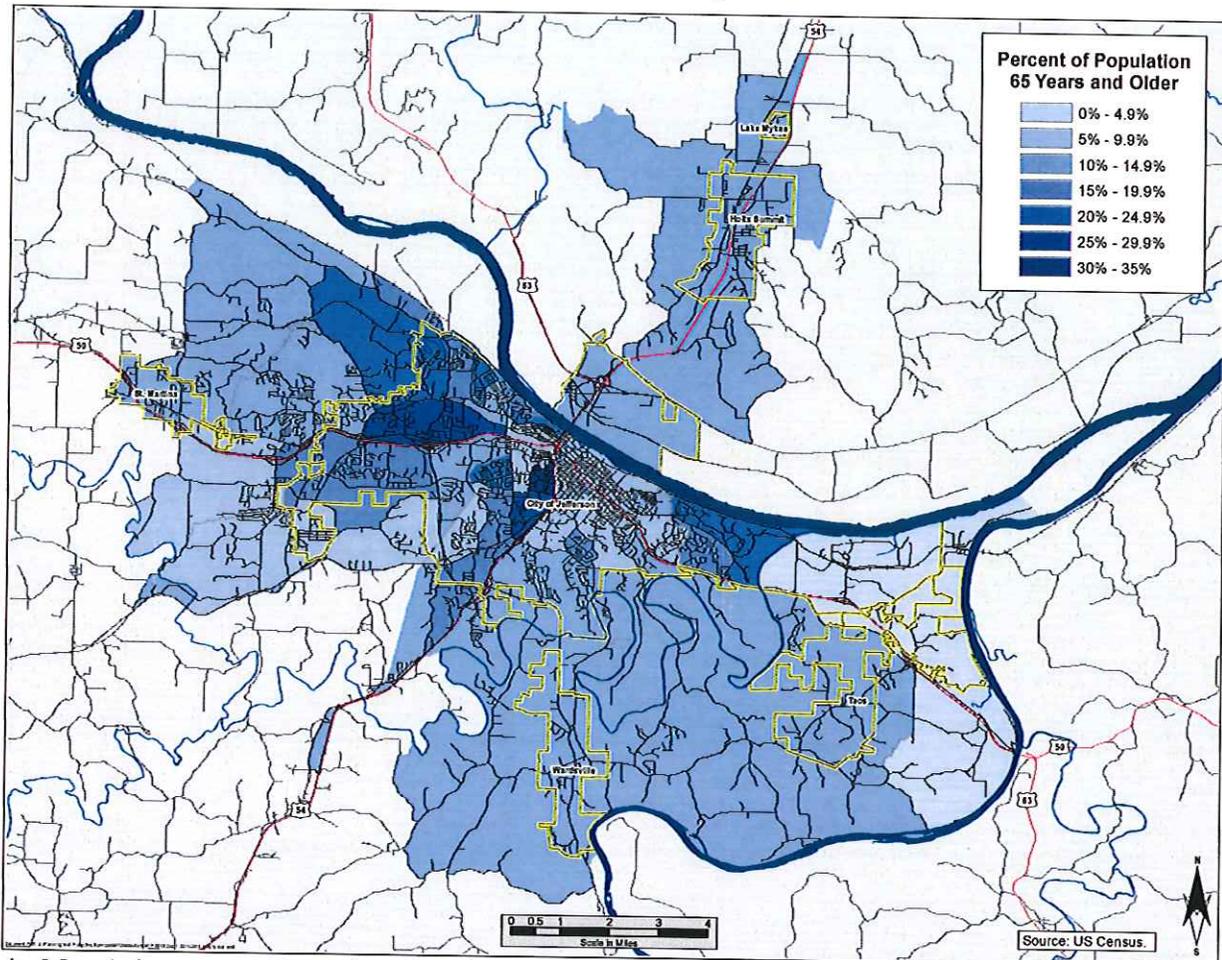
Map 3 - Map of Median Household Income by Census Block Group



Map 3 shows that the central city, within Jefferson City, has a high density of lower incomes compared to areas that surround the central city. Cities like Wardsville and Taos tend to have higher incomes than the majority of the Jefferson City.

Map 4 shows the distribution of the elderly population within the CAMPO MPA.

Map 4 - Elderly Population Location by Census Block Group



As Map 4 shows, an estimate based on the U.S. Census Bureau, 2006-2010 American Community Survey indicates 8,836 persons (12.3%) in the CAMPO Planning Area were age 65 or older in 2010.

Related to Map 4 above, Tables 3 and 4 show the distribution of disabled persons within both Callaway and Cole Counties as well as a breakdown of the different disabilities for each county.

Table 3 - Disabled Population by County

	Callaway County				Cole County			
	With a disability		Percent with a disability		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian non-institutionalized population	5,968	+/-685	14.2%	+/-1.6	9,675	+/-834	13.2%	+/-1.2
Population under 5 years	28	+/-34	1.1%	+/-1.4	21	+/-24	0.4%	+/-0.5
With a hearing difficulty	28	+/-34	1.1%	+/-1.4	14	+/-22	0.3%	+/-0.5
With a vision difficulty	13	+/-23	0.5%	+/-0.9	7	+/-11	0.1%	+/-0.2
Population 5 to 17 years	556	+/-221	7.9%	+/-3.1	704	+/-259	5.4%	+/-2.0
With a hearing difficulty	56	+/-62	0.8%	+/-0.9	51	+/-47	0.4%	+/-0.4
With a vision difficulty	91	+/-113	1.3%	+/-1.6	71	+/-73	0.5%	+/-0.6
With a cognitive difficulty	455	+/-210	6.4%	+/-3.0	403	+/-140	3.1%	+/-1.1
With an ambulatory difficulty	165	+/-129	2.3%	+/-1.8	160	+/-167	1.2%	+/-1.3
With a self-care difficulty	140	+/-122	2.0%	+/-1.7	76	+/-63	0.6%	+/-0.5
Population 18 to 64 years	3,292	+/-528	12.1%	+/-1.9	5,590	+/-749	12.1%	+/-1.6
With a hearing difficulty	907	+/-278	3.3%	+/-1.0	1,307	+/-343	2.8%	+/-0.7
With a vision difficulty	334	+/-147	1.2%	+/-0.5	1,321	+/-360	2.9%	+/-0.8
With a cognitive difficulty	1,222	+/-380	4.5%	+/-1.4	2,513	+/-443	5.4%	+/-1.0
With an ambulatory difficulty	1,802	+/-399	6.6%	+/-1.5	2,862	+/-531	6.2%	+/-1.2
With a self-care difficulty	450	+/-173	1.7%	+/-0.6	699	+/-251	1.5%	+/-0.5
With an independent living difficulty	913	+/-262	3.4%	+/-1.0	1,761	+/-395	3.8%	+/-0.9
Population 65 years and over	2,092	+/-363	40.2%	+/-6.4	3,360	+/-403	37.4%	+/-4.3
With a hearing difficulty	1,012	+/-290	19.5%	+/-5.4	1,479	+/-278	16.5%	+/-3.2
With a vision difficulty	282	+/-151	5.4%	+/-2.9	605	+/-253	6.7%	+/-2.7
With a cognitive difficulty	396	+/-228	7.6%	+/-4.5	728	+/-219	8.1%	+/-2.4
With an ambulatory difficulty	1,199	+/-307	23.1%	+/-5.6	2,070	+/-304	23.0%	+/-3.3
With a self-care difficulty	308	+/-159	5.9%	+/-3.1	517	+/-150	5.8%	+/-1.7
With an independent living difficulty	738	+/-236	14.2%	+/-4.5	1,264	+/-255	14.1%	+/-2.8

Source: U.S. Bureau of the Census

Table 4 - Cole and Callaway County Disabled Populations

	Callaway County	Cole County
Disability status	4.4%	4.2%
Hearing difficulty	3.0%	3.2%
Vision difficulty	3.2%	3.5%
Cognitive difficulty	3.4%	3.5%
Ambulatory difficulty	3.5%	3.7%
Self-care difficulty	3.6%	3.6%
Independent living difficulty	3.6%	2.7%

Source: U.S Bureau of the Census

Table 5, found below, shows the employment profile for the metropolitan planning area.

Table 5 - MPA Employment Profile for 2010

Total Primary Jobs		
	Count	Share
Total Primary Jobs	52,097	100.00%
Jobs by Worker Age		
	Count	Share
Age 29 or younger	10,636	20.40%
Age 30 to 54	30,992	59.50%
Age 55 or older	10,469	20.10%
Jobs by Earnings		
	Count	Share
\$1,250 per month or less	8,732	16.80%
\$1,251 to \$3,333 per month	25,818	49.60%
More than \$3,333 per month	17,547	33.70%
Jobs by NAICS Industry Sector		
	Count	Share
Agriculture, Forestry, Fishing and Hunting	181	0.30%
Mining, Quarrying, and Oil and Gas Extraction	91	0.20%
Utilities	270	0.50%
Construction	2,407	4.60%
Manufacturing	3,427	6.60%
Wholesale Trade	1,147	2.20%
Retail Trade	4,850	9.30%
Transportation and Warehousing	524	1.00%
Information	936	1.80%
Finance and Insurance	2,034	3.90%
Real Estate and Rental and Leasing	287	0.60%
Professional, Scientific, and Technical Services	1,721	3.30%
Management of Companies and Enterprises	1,091	2.10%
Administration & Support, Waste Management and Remediation	1,928	3.70%
Educational Services	1,920	3.70%
Health Care and Social Assistance	4,276	8.20%
Arts, Entertainment, and Recreation	758	1.50%
Accommodation and Food Services	2,792	5.40%
Other Services (excluding Public Administration)	1,654	3.20%
Public Administration	19,803	38.00%
Jobs by Worker Race		
	Count	Share
White Alone	48,444	93.00%
Black or African American Alone	2,496	4.80%
American Indian or Alaska Native Alone	179	0.30%
Asian Alone	583	1.10%
Native Hawaiian or Other Pacific Islander Alone	20	0.00%
Two or More Race Groups	375	0.70%

Source: U.S Bureau of the Census

Identifications of Mobility Needs of Minority Populations

In the development of the Public Participation Plan, as well as other planning activities, CAMPO sought out and considered the needs of those traditionally underserved by existing transportation systems, including minority households.

CAMPO strives to include all the public, including protected classes, in its planning activities. The interested parties list includes employees of Lincoln University, a historically black college, as well as many community action organizations that work with and represent minorities. Racial minorities make up approximately 16.5% of the CAMPO population, with majority located in the core of the city in close proximity to city hall, where the majority of the CAMPO public meetings and events are held. CAMPO meetings are also held at a time and place served by public transportation.

The Board of Directors includes many elected officials which represent minority constituents and meet with them regularly. The past Chairman of the Board of Directors is a member of a minority class and currently serving on the Board of Directors is one known minority member. The Technical Committee has always had at least one known minority member. These members of the committees are chosen by their respective jurisdictions and not CAMPO, itself.

Distribution of State and Federal Funds

Please refer to Map 1 showing the minority population for the MPO area, located in the *Demographic Profile of the Metropolitan Area* section of this document. Table 6 below shows the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects.

Table 6 – Distribution of Various Funds by Location

	2013	2014	2015	2016	Sub Total
City of Jefferson					
Bridge	\$27,000	\$40,000	\$1,797,000	\$10,270,000	\$12,134,000
Non-motorized	\$563,723	\$103,000	\$806,000		\$1,472,723
Rail (Amtrak)	\$33,000	\$490,460			\$523,460
Road	\$197,000	\$1,960,000	\$5,214,707	\$6,000	\$7,377,707
Transit	\$804,175	\$828,010	\$852,551	\$877,827	\$3,362,563
Total					\$24,870,453
Callaway County					
Bridge	\$27,000	\$744,000			\$771,000
Total					\$771,000
Holts Summit					
Non-motorized	\$47,288	\$337,964			\$385,252
Total					\$385,252
Wardville					
Road	\$15,000	\$5,000	\$5,000	\$5,000	\$30,000
Total					\$30,000
Cole County					
Non-motorized			\$250,000		\$250,000
Road	\$1,859,000				\$1,859,000
Transit	\$60,000	\$95,200	\$60,000	\$95,200	\$310,400
Total					\$2,419,400
Various *					
Road	\$10,000	\$555,000	\$20,000	\$7,623,000	\$8,208,000
Bridge	\$6,250	\$6,250			\$12,500
Total					\$8,220,500

* Various are projects with no defined specific locations or cross through and extend out fo the MPO area.

Disparate Impact Analysis

CAMPO only has decision making authority on the expenditure of minimal amount of funds, approximately \$200,000 per year in sub-allocated STP program funds. How and where these funds are spent is determined by the CAMPO Board of Directors, and ultimately approved by MoDOT. These funds and projects have been primarily located in high minority and low income census block groups. The table below summarizes the past projects and one upcoming project and minority population for the location of the projects.

Year	Project Description	Minority Population in Adjoining Area	Project Cost
2009	Stadium, Lafayette & Leslie Roundabout	21% in Block Group 290510105002 19% in Block Group 290510105004	\$650,000 Total (\$520,000 STP)
2010	Bolivar Ave. & W. McCarty Intersection Improvement	52% in Block Group 290510207001	\$150,000 Total (\$100,000 STP)
2010	Tanner Bridge Roundabout intersection improvements	19% in Block Group 290510105004 11% in Block Group 290510104004 17% in Block Group 290510104006	\$750,000 Total (\$600,000 STP)
Future 2016	Stadium, Jefferson, Monroe & US 54 safety and capacity intersection improvements	21% in Block Group 290510105002 32% in Block Group 32.172	\$3,000,000 Total (\$787,707 STP funds)

Based on the above table and previous demographic information from the *Demographic Profile of the Metropolitan Area* and transportation system investment information in Table 6 above, there is an obvious correlation between the location of the majority of protected classes located in MPO and majority of transportation system investment being spend, one can conclude that there are no disparate impacts on as a result of MPO decision in transportation investments.

Title VI Compliance Report Submission Process

CAMPO submits a Title VI Compliance report to MoDOT on an annual basis. The process is initiated by MoDOT staff in form of a detailed questionnaire for CAMPO to complete and return to MoDOT in a timely manner. The questionnaire addresses such items as planning activities performed, actions taken to promote Title VI compliance, contracts awarded, Title VI complaints, public involvement activities and related Title VI public interactions.

Appendix A - Title VI Annual Certification and Assurances

Capital Area Metropolitan Planning Organization



Room 120 320 E. McCarty Street
Jefferson City, MO 65101

Phone: 573.634.6410 Fax: 573.634.6457
<http://www.jeffcitymo.org/cd/campo/campo.html>

TITLE VI Certifications and Assurances

The Capital Area Metropolitan Planning Organization HEREBY CERTIFIES THAT, as a condition of receiving federal financial assistance under the Federal Transit Act of 1964, 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 Capital Area Metropolitan Planning Organization will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B (as amended) and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The Capital Area Metropolitan Planning Organization will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

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



Jeff Hoelscher, Chairman
For Capital Area Metropolitan Planning Organization

2-19-14

Date

DEPARTMENT OF TRANSPORTATION TITLE VI ASSURANCE

The Capital Area Metropolitan Planning Organization (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 Federally Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred 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, sex 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 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 Metropolitan Area Transportation Planning Process:

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 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:

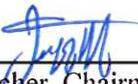
The Capital Area Metropolitan Planning Organization, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally -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 clauses of Appendix A of this assurance in every contract subject to this Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix B of this assurance, as a covenant running with the Land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon or Interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved

under FTA Programs 5307 and 5309; and (b) for the construction or use or access to space on, over, or under real property acquired, or improved under FTA Programs 5307 and 5309

8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

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



Jeff Hoelscher, Chairman
Capital Area Metropolitan Planning Organization

2-19-14

Date

APPENDIX A TO TITLE VI ASSURANCE (to be inserted into every contract subject to Title VI)

The Capital Area Metropolitan Planning Organization is herein referred to as "CAMPO." Note: The City of Jefferson herein referred to as the "City" is the Fiscal Agent and Administrator for CAMPO and houses the CAMPO office.

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 City/CAMPO 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 City/CAMPO, 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 City/CAMPO shall impose contract sanctions as it or the Federal Transit Administration may determine to be appropriate, including, but not limited to:
 - (a) withholding of payments to the contractor under the contract until the contractor complies; and/or
 - (b) cancellation, termination, or suspension of the contract, in whole or in part.
- (6) Incorporation of Provisions: The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as the City/CAMPO 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 City/CAMPO to enter into such litigation to protect the interests of the City/CAMPO, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

APPENDIX B TO TITLE VI ASSURANCE

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the (Name of Recipient) will accept title to the lands and maintain the project constructed thereon, in accordance with (Name of Appropriate Legislative Authority), the Regulations for the Administration of (Name of Appropriate Program) and the policies and procedures prescribed by (Name of Appropriate Administration) of the Department of Transportation and, also in accordance with and in compliance with 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 (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the (Name of Recipient) all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit 'A' attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto (Name of Recipient) and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the (Name of the Recipient), its successors and assigns.

The (Name of Recipient), in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person 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 with regard to any facility located wholly or in part on, over or under such lands hereby conveyed[,] [and]* (2) that the (Name of the Recipient) shall use the lands and interests in lands and interests in lands so conveyed, in compliance with 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, and as said Regulations may be amended, and (3) that in the event of breach if any of the above-mentioned nondiscrimination conditions, the Department shall have a right to re-enter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.*

* Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

APPENDIX C TO TITLE VI ASSURANCE

The following clauses shall be included in all deeds, licenses, leases, or similar instruments entered into by the City/CAMPO pursuant to the provisions of Assurance 7(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself/himself, his/her heirs, personal representatives, successors in interest and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that in the event that facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination of Federally-Assisted Programs of the Department of Transportation- Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

That in the event of breach of any of the above nondiscrimination covenants, City/CAMPO shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said lands and facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.

[Include in deeds]*

That in the event of breach of any of the above nondiscrimination covenants, City/CAMPO shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of City/CAMPO and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by City/CAMPO pursuant to the provisions of Assurance 7(b).

The (grantee licensee, lessee, permittee, etc., as appropriate) for herself/himself, his/her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in case of deeds, and leases add "as a covenant running with the land") that (1) no person on the grounds of race, color, or national origin shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing services thereon, no person on the grounds of race, color, or national origin shall be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination, and (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other 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, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

That in the event of breach of any of the above nondiscrimination covenants, City/CAMPO shall have the right to terminate the [license, lease, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

[Include in deeds]*

That in the event of breach of any of the above nondiscrimination covenants, City/CAMPO shall have the right to re-enter said land and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of City/CAMPO and its assigns.

* Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of Title VI of the Civil Rights Act of 1964.

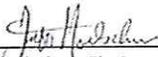
Appendix B - Metropolitan Transportation Planning Process Certification

METROPOLITAN TRANSPORTATION PLANNING PROCESS CERTIFICATION

In accordance with 23 CFR 450.334, the Capital Area Metropolitan Planning Organization, which is the Metropolitan Planning Organization for the Jefferson City, Missouri Urbanized Area and the Missouri Department of Transportation hereby certify that the transportation planning process is addressing major issues in the metropolitan planning area and is being conducted in accordance with all applicable requirements of:

1. 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart;
2. In nonattainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR part 93;
3. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21;
4. 49 U.S.C. 5332, prohibiting discrimination on the bases of race, color, creed, national origin, sex, or age in employment or business opportunity;
5. Section 1101(b) of the SAFETEA-LU (pub. L. 109-59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
6. 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
7. The provisions of the Americans with Disabilities Act of 1990(42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38;
8. The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial-aid assistance;
9. Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
10. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

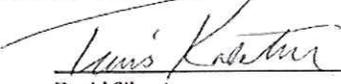
I further certify that I am aware of what this certification represents and have been briefed accordingly.



Jeff Hoelscher, Chairman
Capital Area Metropolitan Organization

7-17-13

Date



David Silvester
Missouri Department of Transportation

7-17-13

Date

Appendix C - Title VI Complaint Procedure

Capital Area Metropolitan Planning Organization

Title VI Complaint Procedure

For the Jefferson City, Missouri Urbanized Area

November 16, 2012

The Capital Area Metropolitan Planning Organization is administered by the City of Jefferson Planning and Protective Services - Room 120 - John G. Christy Municipal Building – 320 East McCarty, Jefferson City, Missouri - Telephone 573-634-6410 - Fax: (573) 634-6457
Website: <http://www.jeffcitymo.org/cd/campo/campo.html>

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 (MODOT). The opinions, findings, and conclusions expressed in this report are not necessarily those of the Federal Highway Administration, Federal Transit Administration, or the Missouri Department of Transportation (MODOT).

Non-discrimination Policy

CAMPO does not discriminate based on race, color, national origin, sex, religion, age, or disability and maintains information on and processes for complaints related to discrimination.

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.

Persons who feel that they have been subjected to discrimination should contact the CAMPO or federal offices for information on local and federal procedures and forms for discrimination complaints.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Title VI Program Officer, c/o City Counselor, John G Christy Municipal Building/City Hall, 320 East McCarty Street, Jefferson City, MO 65101. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Officer may be utilized for resolutions. The Title VI Program Officer will notify CAMPO of all Title VI related complaints as well as resolutions.

Those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration, and/or the U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, 901 Locust Street, Room 404, Kansas City, MO 64106, Telephone 816-329-3920, or Federal Highway Administration, 3220 West Edgewood, Suite H, Jefferson City, MO 65109 Telephone: 573-638-2617.

Procedure for Filing Complaints through CAMPO

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Program Officer will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination date when the Complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI Program Office will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
3. The Complainant will be provided with a written acknowledgement that CAMPO has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:

- a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a CAMPO service, the City of Jefferson as a federal-aid recipient; or its sub-recipient or contractor.
5. A complaint may be dismissed for the following reasons:
- a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once the Title VI Program Officer decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: Complainant's name, basis, alleged harm, race, color and national origin of the Complainant.
7. In cases where the Title VI Program Office assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint the Title VI Program Officer will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its findings will be reviewed with CAMPO officials and in some cases the investigative report and findings will be reviewed by CAMPO's Legal Counsel.
9. The Title VI Program Officer/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
- a. In the event CAMPO is in noncompliance with the Title VI regulations remedial actions will be listed.
10. Notice of the Title VI Program Officer's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
- a. The Title VI Program Officer will reconsider the determination, if new facts, come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the Title VI Program Officer, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the
11. A copy of the complaint and the Title VI Program Officer's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

What is Title VI

Title VI of the Civil Rights Act of 1964 is the Federal law that prohibits discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance.

Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of FHWA and FTA that discrimination on the ground of race, color, national origin, disability/handicap, sex, age, or income status shall not occur in connection with programs or activities receiving financial assistance from the FHWA.

Programs Covered

FHWA-assisted programs include any highway, project, program or activity for the provision of services, financial aid, and other benefits. This includes the transportation planning activities conducted by CAMPO.

Public Participation

The CAMPO public participation and involvement process is designed to give the public ample opportunities for early and continuing participation in critical transportation projects, plans and decisions and to provide full access to key decisions.

CAMPO encourages the involvement of interested groups and the general public during the development and modification of transportation plans. All meetings of the CAMPO Technical Committee and Board of Directors are open to the public. Meeting schedules, agendas, and minutes are published on the CAMPO website.

CAMPO's 2008 Public Participation Plan outlines the public notice, comment procedures and the process used to support citizen participation during development of transportation plans. CAMPO's plans and publications can be found at the CAMPO website.

CAMPO

c/o Dept. of Planning & Protective Services
John G. Christy Municipal Building
320 McCarty Street
Jefferson City, MO 65101

Phone: (573) 634-6410

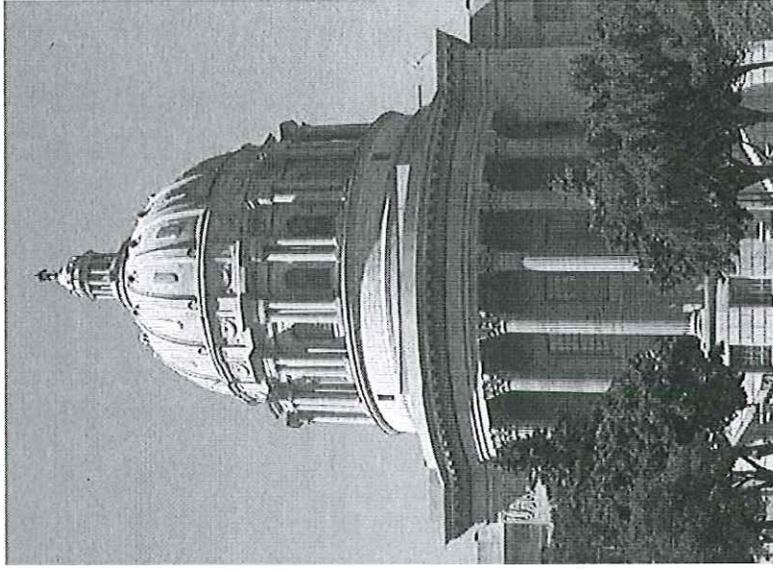
Fax: (573) 634-6457

Email: jcplanning@jeffcitymo.org

www.jeffcitymo.org/campo

Capital Area Metropolitan Planning Organization

Your Rights Under Title VI!



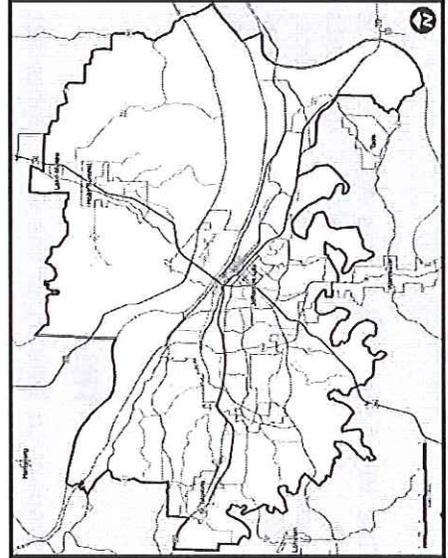
Implementing and supporting a cooperative, comprehensive and continuing transportation and planning process for the Jefferson City Urbanized Area.

What is the MPO?

A Metropolitan Planning Organization is defined in Federal Transportation Legislation as the designated local decision-making body that is responsible for carrying out the metropolitan transportation planning process.

When an area reaches a population of 50,000, a multi-jurisdictional transportation planning organization referred to as a Metropolitan Planning Organization must be formed by agreement of the Governor of the state and "units of general purpose local governments representing 75% of the affected metropolitan population" to coordinate metropolitan transportation related planning and transportation related investments. In 2000, the Jefferson City Urbanized Area had a population of 53,714 people.

CAMPO was formally established with the development of membership, bylaws, and the completion of a Memorandum of Understanding in March of 2003. The MOU was drafted with cooperation of Lake Mykee, Holts Summit, St. Martins, Jefferson City, Callaway County, and Cole County, followed by the approval of the Governor of Missouri on May 7, 2003



Title VI Complaint Procedure

- 1) Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964 may file a complaint with the Capital Area Metropolitan Planning Organization (CAMPO) at the Department of Planning & Protective Services, John G. Christy Municipal Building, 320 McCarty Street, Jefferson City, MO 65101. The complainant may also file complaints with the Federal agency providing funding to the program, specifically the Federal Highway Administration or the Federal Transit Administration if so desired.
- 2) All complaints submitted to CAMPO, which is administered by the City of Jefferson, shall be referred to the City of Jefferson. Complaints received by CAMPO and forwarded to the City of Jefferson shall if possible, be resolved informally by the City of Jefferson. However, if the issue is not satisfactorily resolved through informal means, or if at any time the person(s) request(s) to file a formal written complaint, the complainant may do so.
- 3) Copies of the CAMPO Title VI Complaint Procedure are available at the CAMPO offices and on the CAMPO website, along with related information, and complaint forms (local and Federal) at www.jeffcitymo.org/ppls/campo/TitleVIpage.html. These items may also be requested by mail, phone or in person (contact information is on the reverse side of this brochure).
- 4) CAMPO and the City of Jefferson will maintain a log of all complaints received by CAMPO for inclusion in required CAMPO reports and will include the following information:
 - a) Name of complainant
 - b) Name of respondent
 - c) Basis of the complaint, i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation
 - d) Date the complaint was received by the MPO
 - e) Actions taken by the MPO
 - f) Final resolution results

CAMPO Publications

Public Participation Plan (PPP). The PPP identifies the process to be used for providing interested parties reasonable opportunities to be involved with the metropolitan transportation planning process for the MPO region.

Limited English Proficiency Plan (LEP). The LEP identifies the process to be used for providing services to those person with limited English proficiency. The plan can be found at <http://www.jeffcitymo.org/cd/campo/documents/LEPPlanadoptedFebruary202008.pdf>.

2030 Metropolitan Transportation Plan. The 2030 long range Metropolitan Transportation Plan (MTP) presents a plan for the development of transportation programs and projects within the Capital Area Metropolitan Planning Organization Metropolitan Planning Area which may occur over the next 20+ years.

Appendix D - Title VI Complaint Form

**Capital Area Metropolitan Planning Organization
Title VI Civil Rights
Complaint Form**

Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964 may file a written complaint. All formal complaints received by the Capital Area Metropolitan Planning Organization (CAMPO) shall be forwarded to the Civil Rights Officer for the City of Jefferson, Missouri.

Section I

Name: _____

Address: _____

City/State/Zipcode: _____

Telephone Numbers:

(Home) _____ (Work) _____

Electronic Mail Address: _____

Accessible Format Requirements:

Large Print _____ Audio tape _____

TDD _____ Other _____

Section II

Are you filing this complaint on your own behalf?

Yes ____ No ____

[If you answered "yes" to this question, go to Section III.]

If not, please supply the name and relationship of the person for whom you are complaining: _____

Please explain why you have filed for a third party.

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes ____ No ____

Section III

Have you filed this complaint with any of the following agencies?

Transit Provider _____ Missouri Department of Transportation _____ City of Jefferson _____

Federal Highway Administration _____ Federal Transit Administration _____

Other _____

Have you filed a lawsuit regarding this complaint? Yes _____ No _____

If yes, please provide a copy of the complaint form.

[Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the court.]

Section IV

Name of agency that the complaint is against:

Contact person: _____ Title: _____

Telephone number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to agency that the complaint is against?

Yes _____ No _____

May we release your identity to the agency that the complaint is against?

Yes _____ No _____

Sign here: _____

Date: _____

[Note - your complaint cannot be accepted without a signature.]

Please mail your completed form to: Capital Area MPO, Department of Planning and Protective Services / Planning Division, Room 120 - John G. Christy Municipal Building, 320 East McCarty, Jefferson City, Missouri.

Telephone 573-634-6410

www.jeffcitymo.org/campo/

Your rights in Title VI non-discrimination complaints:

Filing this complaint with CAMPO does not prevent you from filing a complaint with the Federal Agency providing funding to the party against which a complaint is being lodged.

For additional information on State and Federal Title VI offices, contact CAMPO.

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 72 business hours to process the request.

Appendix E – Public Participation Plan

Capital Area Metropolitan Planning Organization



Public Participation Plan

For the Jefferson City, Missouri Urbanized Area

Adopted February 20, 2008

Revised October 19, 2011

The Public Participation Plan was initially adopted on February 20, 2008 and subsequently adopted as revised on April 21, 2010.

The Public Participation Plan was revised and adopted on October 19, 2011. Revisions included the Non-Discrimination Policy and the Process for Filing Complaints.

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 (MODOT). The opinions, findings, and conclusions expressed in this report are not necessarily those of the Federal Highway Administration, Federal Transit Administration, or the Missouri Department of Transportation (MODOT).

The Capital Area Metropolitan Planning Organization is administered by the City of Jefferson
Department of Planning & Protective Services / Planning Division
Room 120 - John G. Christy Municipal Building
320 East McCarty, Jefferson City, Missouri
Telephone 573-634-6410
www.jeffcitymo.org/campo/

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Vice-Chairman – Jeff Hoelscher, Eastern District Commissioner – Cole County

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Region VII

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Administration: Missouri Division
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Region VII

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RESOLUTION 2011-02

A RESOLUTION OF THE CAPITAL AREA METROPOLITAN PLANNING ORGANIZATION ADOPTING REVISIONS TO THE PUBLIC PARTICIPATION PLAN PERTAINING TO NON-DISCRIMINATION

WHEREAS, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) requires that metropolitan planning organizations (MPOs) establish a "proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement."; and

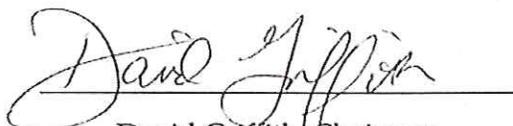
WHEREAS, the Capital Area Metropolitan Planning Organization provides a forum for cooperative decision-making by elected officials from the Jefferson City urbanized area and is also responsible for coordinating transportation planning for a multi-modal transportation system; and

WHEREAS, the Public Participation Plan identifies the processes for public participation in the development of Metropolitan Transportation Plans (MTP), Transportation Improvement Programs (TIP), Unified Planning Work Programs (UPWP) other major Transportation Studies by the MPO and the transportation planning process; and

WHEREAS, a revision is necessary to update the policy on Non-Discrimination, and Title VI complaint procedures;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Capital Area Metropolitan Planning Organization that revisions to the Public Participation Plan for the Jefferson City, Missouri Metropolitan Planning Organization, as shown in Attachment A, are hereby approved and adopted.

Adopted this 19th day of October 2011.


David Griffith, Chairman

Attest: 
Anne Stratman, Administrative Assistant

Introduction

The Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) of 2005 requires metropolitan planning areas to have a Continuing, Comprehensive, and Coordinated (“3C”) transportation planning process that results in plans and programs that consider all transportation modes and supports metropolitan community development and social goals. These plans and programs are intended to lead to the development and operation of an integrated, Intermodal transportation system that facilitates the efficient, economic movement of people and goods.

The Capital Area Metropolitan Planning Organization or CAMPO also provides a forum for cooperative decision-making by elected officials from the metropolitan region and is also responsible for coordinating transportation planning for a multi-modal transportation system, and requires that the organization establish a “proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement.”

The Public Participation Plan outlines the opportunities for the public to participate in the activities of CAMPO and in the development of Metropolitan Transportation Plans, Transportation Improvement Programs and other major transportation studies.

Transportation Planning Activities - Functions, Plans and Publications

CAMPO performs multi-jurisdictional transportation planning for the urbanized area and the nearby non-urbanized areas within a metropolitan planning area (MPA) and functions as a certifying agency for non-discrimination and public participation activities related to State and Federal metropolitan planning regulations. The plans and publications of the organization include the following:

- Transportation Improvement Programs (TIP) - a four to six year program of federal, state, and local transportation projects and programs designed to improve the transportation system, use Federal Funding or that have regional significance
- A Transit Program of Projects
- The Unified Planning Work Program (UPWP) – An annual program containing the budget and staff work plan
- The Metropolitan Transportation Plan (MTP) - a long range plan covering at least 20 years into the future, identifying both the short and long range transportation improvements that should be implemented in the region. The MTP presents alternatives and makes recommendations that are designed to reinforce the region's stated goals and objectives for regional development and includes a comprehensive inventory and assessment of the region's transportation system, its resources and its needs
- The Annual Listing of Obligated Projects - a listing of projects from the TIP for which Federal funds have been obligated in the preceding year
- The Public Participation Plan - a plan that identifies the process to be used for providing interested parties reasonable opportunities to be involved with the metropolitan transportation planning process for the CAMPO region; and
- Certification of the continuing, cooperative, and comprehensive planning process for the CAMPO planning area

Public Participation and Notice Policies

- CAMPO will engage the public in the transportation planning process according to the policies contained in this public participation plan and to the requirements of state and federal laws through timely information, public notification of activities and documents, accessible public meetings, and availability for questions and queries.
- State and local agencies, and officials responsible for planning activities within the Metropolitan Planning Area that are affected by transportation, such as local entities involved with planned growth, economic development, environmental protection, airport operations or freight transportation will be consulted in the development of the Metropolitan Transportation Plan and the Transportation Improvement Program planning activities to the maximum extent practicable.
- CAMPO will solicit the needs of those traditionally underserved by existing transportation system, such as elderly, disabled, low income and minority households who may have difficulty accessing or participating in community planning activities, through its public participation process.
- Public meetings will be held at locations and times convenient to potentially affected citizens.
- Since public comment periods are occasionally extended and may exceed minimum comment periods, public comments and recommendations are accepted continuously on various plans and topics, even if scheduled comment periods have ended.
- The public will be able to submit comments on these plans and to be added to the Interested Parties contact list if they wish.
- A database of interested parties will be maintained so that these interested parties may be notified when plans and studies are planned, and that they may have reasonable opportunities to comment on these transportation plans and products, and participate in planning activities, subcommittees, panels, and focus groups. This list will be located in the CAMPO offices and be available on request.
- Interested parties (including the public at large) may comment and make recommendations on any plan or program in person, by fax, email, or letter to the City of Jefferson Department of Community Development, 320 E. McCarty St, Jefferson City 65101. Faxes should be directed to (573) 634-6457, and emails to jcplanning@jeffcitymo.org. Comments will be written down and provided to the Technical Committee and the Board of Directors, and kept in MPO comment files. Comments may be included in plan appendices as summaries of public comments.
- The availability of the Public Participation Plan or amendments to the Public Participation Plan for comments will be announced through a public notice and press releases sent to local newspapers and placed on the CAMPO webpage. The announcement will instruct the public as to where they may view copies of the Public Participation Plan, participate in the Public Participation Plan discussions or schedule meetings and comment on the Public Participation Plan.
- Notices for amendments to the Public Participation Plan will contain:
 - Notice that documents are being developed or amended, and where they will be located,
 - the duration of the public comment period,
 - instructions for submitting comments and
 - the date, time, and location of meetings
- Notices and publications for public access regarding changes to the Public Participation Plan, Metropolitan Transportation Plan, the Transportation Improvement Program as well as draft documents will be available at these locations:
 - City Clerk, City of Jefferson

- County Clerk, Cole County Courthouse
 - County Clerk, Callaway County Courthouse
 - City Clerk, Holts Summit City Hall
 - City Clerk, St. Martins City Hall
 - Lake Mykee Board of Trustees
 - Missouri River Regional Library
- If the responses to public comments results in the Metropolitan Transportation Plan or Transportation Improvement Program and other plan or program documents or amendments being significantly different from the draft document which was sent out for public review, an additional public comment period may be held. Determination of the need for an additional comment period will be made by CAMPO.
 - If significant oral and written comments and responses are received, an appendix containing the comments and recommendations will be made part of the final document.
 - Local jurisdictions are encouraged to include public participation in the planning of projects and programs. CAMPO will collect information on the public participation process used by the project sponsors as part of the project application review process.
 - Upon request, staff will be available to meet with local officials or interested groups to discuss or present the MTP, TIP, UPWP or other plans and programs.
 - The website will be maintained and updated with all documents produced by CAMPO, and to provide the most current and accurate transportation planning information available. The website will also contain meeting agendas, meeting minutes, Board of Director members, Technical Committee members, plans, studies and other information for the publics benefit.
 - Visualization techniques will be used in describing the Metropolitan Transportation Plan and the Transportation Improvement Program, including charts, graphs, photographs, maps, and the use of GIS systems or power point presentations.
 - Brochures will be produced to provide information on the metropolitan transportation planning process, the responsibilities of CAMPO, and the public participation process. The brochure will be available at all public meetings and events, as well as available for view on the website.
 - When providing notices for a meeting, pending a revision of the CAMPO bylaws, CAMPO will adhere to the requirements of the Missouri Sunshine Laws and provide a minimum of 24 hours notice before the meeting.

Public Comment Periods

Plan	Comment Period*	Beginning
Metropolitan Transportation Plan	25 days	Board meeting
Metropolitan Transportation Plan amendments	25 days	Board meeting
Public Participation Plan amendment	45 days	Board meeting
Biennial Transportation Improvement Program	25 days	Board meeting
Transportation Improvement Program amendments	7 days	When posted to the CAMPO Website and notice is sent out

* Comment periods shown reflect the minimum time that will occur

The Metropolitan Transportation Plan Update

Updates to Metropolitan Transportation Plan must occur at least every 5 years and require significant public input and public participation throughout the plan development.

Multiple public meetings in the form of focus groups, workshops, open houses, member agency staff meetings, public meetings and public comment periods may be scheduled for updating the Metropolitan Transportation Plan. For extensive updates, expanded or multiple public meetings are scheduled.

For a plan under review, and prior to adoption, opportunities to address the Technical Committee and Board of Directors will be provided. With a 25 day comment period before final approval of the plan.

Amendments to the Metropolitan Transportation Plan

For a Metropolitan Transportation Plan amendment, public notice and a minimum 25-day comment period applies, along with opportunities to address CAMPO committees are provided.

Amendments to the Public Participation Plan

For amendments to the Public Participation Plan a minimum 45 day public comment period is required and initiated by the Board of Directors.

The two year Transportation Improvement Program Update

Updates to the Transportation Improvement Program are required at least every four years. The Transportation Improvement Program is updated every two years and requires less public participation at the MPO level and more at the local project level. It will have a minimum 25 day public comment period prior to adoption to accommodate the time between Board meetings.

Amendments to the Transportation Improvement Program

Amendments to the Transportation Improvement Program have a minimum period of 7 calendar days prior to the regularly scheduled Board of Directors meeting.

The public comment period will begin the day following the posting of the announcement on the CAMPO website.

The public comment period notice will be placed in the announcement section of the CAMPO webpage and email notification sent to names on the interested parties list and committee members.

The exception to the 7 day comment period is in the case of an emergency or time-critical need to amend the tip.

Program of Projects – Approval and Public Participation

Each recipient of a Section 5307 grant shall have complied with the public participation requirements of Section 5307(c)(1) through (7). Each grantee is required to develop, publish, afford an opportunity for a public hearing on, and submit for approval a Program of Projects (POP).

As part of the Transportation Improvement Program update and development process, JEFFTRAN, the Jefferson City public transit provider has elected to use the CAMPO public participation process to comply with federal transit requirements in the preparation of their Program of Projects and is coordinating with CAMPO to satisfy public hearing requirements.¹

Emergency (time critical) amendments to the CAMPO TIP

Pending a qualification of emergency meeting procedures under the Missouri Sunshine Laws, in the event that an emergency amendment must be made to the TIP where a public participation process is normally required, the Board of Directors may elect to expedite emergency - related TIP revisions and notify the public after the fact.

The Chairman of the Board of Directors or the Vice-Chair in the absence of the Chairman, is authorized to call a special meeting, to discuss and approve the proposed amendment, or if time is critical, call for a role call vote by phone, fax or email, so long as the vote is recorded and Board of Directors and Technical Committee members are notified of the results. Formal notice of action is posted at locations as in a normal amendment notice. This emergency amendment or modification will then be included in the agenda at the next regularly scheduled meeting for recording into the minutes.

Updates to the Annual Unified Planning Work Program

The UPWP by regulation is not required to undergo the public involvement process, but CAMPO has elected to place the UPWP on the CAMPO website for public review and comment and notify interested parties of the UPWP development.

Amendments and Administrative Modifications to the MTP and the TIP

These documents may have either 1) an amendment, or 2) an administrative modification (changes to projects that are included for illustrative purposes only will not require an amendment.)

Amendment means: a revision to Metropolitan Transportation Plan or Transportation Improvement Program that involves a major change to a project included in a metropolitan transportation plan, or Transportation Improvement Program. An amendment requires approval by the Board of Directors, MODOT, FHWA, and FTA.

An amendment is a revision that requires public review and comment, or possible re-demonstration of fiscal constraint, and includes:

- Addition or deletion of a project
- A major change in project cost, (greater than 15% change)
- A major change in a project phase initiation date (greater than 1 year)
- A major change in design concept or design scope (e.g., changing project termini or the number of through traffic lanes, changing to multiple phases instead of a single project).

¹ Federal Transit Administration: http://www.fta.dot.gov/FY2007TriReview/11planning.htm#Basic_Req

Administrative modification means: a minor revision to a Metropolitan Transportation Plan or a Transportation Improvement Program. An administrative modification does not require federal approval or public review.

For the Transportation Improvement Program, an administrative modification change:

- Does not affect financial constraint,
- Does not affect air quality conformity,
- Does not involve a significant change in the scope of a project or projects
- Does not add a new project or delete an existing project,
- Does not add new project phase(s) nor delete project phase(s) over \$500,000 to the first three years of the TIP.
- Draws down from an existing TIP line item.
- An administrative modification may include minor changes to costs of a project or phase, phase initiation dates, or minor changes to funding sources of previously-included projects.

Public Participation Plan Update and Review

The Public Participation Plan will be reviewed annually and updated as conditions require by staff. The following section describes the process for the development and adoption of the Public Participation Plan. These procedures will be followed for any major revision to the Public Participation Plan.

1. Draft updates will be presented to the Technical Committee, in advance of a regularly scheduled public meeting, for review and recommendations by the Technical Committee. Once a draft update is recommended for approval by the Technical Committee draft of the Public Participation Plan will be forwarded to the Board of Directors for their review. The Board of Directors will initiate a public comment period of at least 45 days and hold at least one public meeting to obtain public input and hear oral testimony on the changes to the Public Participation Plan.
2. Announcements will also be sent to our Interested Parties Contact List. Anyone who so requests will be added to the Interested Parties Contact List. Copies will also be made available through electronic means via the internet and email.
3. At the end of this comment period, the Public Participation Plan will become the official public participation process for plans and programs of the Capital Area Metropolitan Planning Organization. If the Participation Plan has major revisions, another 45 day public comment period will occur. Printed Copies of the Public Participation Plan will be available at the office of the City of Jefferson Department of Community Development 320 E. McCarty St. Jefferson City, MO 65101 (573) 634-6410, or online at www.jeffcitymo.org/campo.

Special Accommodations

Persons requiring special accommodations for attendance at meetings, activities and functions because of a disability or physical impairment need to contact the CAMPO office, located at Room 120 - John G. Christy Municipal Building 320 East McCarty, Jefferson City, Missouri, or by telephone at 573-634-6410 at least seven (7) working days prior to the event.

CAMPO maintains Limited English Proficiency policies and performs periodic reviews of the CAMPO Limited English Proficiency Plan.

Non-discrimination Policy

CAMPO does not discriminate based on race, color, national origin, sex, religion, age, or disability and maintains information on and processes for complaints related to discrimination.

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.

The Capital Area Metropolitan Planning Organization is administered by the City of Jefferson Department of Planning and Protective Services Room 120, 320 East McCarty Street, Jefferson City, MO 65101.

Persons who feel that they have been subjected to discrimination should contact the CAMPO or federal offices for information on local and federal procedures and forms for discrimination complaints.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Title VI Program Officer, c/o City Counselor, John G Christy Municipal Building/City Hall, 320 East McCarty Street, Jefferson City, MO 65101. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Officer may be utilized for resolutions. The Title VI Program Officer will notify CAMPO of all Title VI related complaints as well as resolutions.

Those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration, and/or the U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights, 901 Locust Street, Room 404, Kansas City, MO 64106, Telephone 816-329-3920, or Federal Highway Administration, 3220 West Edgewood, Suite H, Jefferson City, MO 65109 Telephone: 573-638-2617.

Procedure for Filing Complaints

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Program Officer will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination date when the Complainants became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI Program Office will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.

3. The Complainant will be provided with a written acknowledgement that CAMPO has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a CAMPO service, the City of Jefferson as a federal-aid recipient; or its sub-recipient or contractor.
5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once the Title VI Program Officer decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: Complainant's name, basis, alleged harm, race, color and national origin of the Complainant.
7. In cases where the Title VI Program Office assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint the Title VI Program Officer will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its findings will be reviewed with CAMPO officials and in some cases the investigative report and findings will be reviewed by CAMPO's Legal Counsel.
9. The Title VI Program Officer/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event CAMPO is in noncompliance with the Title VI regulations remedial actions will be listed.
10. Notice of the Title VI Program Officer's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. The Title VI Program Officer will reconsider the determination, if new facts, come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by the Title VI Program Officer, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the
11. A copy of the complaint and the Title VI Program Officer's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

Appendix A - Interested Parties, Participation, and Consultation

23 CFR Subpart C - Section 450.316

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

(1) The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:

(i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;

(ii) Providing timely notice and reasonable access to information about transportation issues and processes;

(iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;

(iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;

(v) Holding any public meetings at convenient and accessible locations and times;

(vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;

(vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;

(viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;

(ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part; and

(x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.

(2) When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations

(40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.

(3) A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

(b) In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, metropolitan transportation plans and TIPs shall be developed with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:

(1) Recipients of assistance under title 49 U.S.C. Chapter 53;

(2) Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and

(3) Recipients of assistance under 23 U.S.C. 204.

(c) When the MPA includes Indian Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.

(d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and the TIP.

(e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under §450.314.

Appendix B – Estimated Timeline for Development of the Biennial TIP

January (mid)	Notification to submit TIP projects distributed to participating jurisdictions with information on submitting projects for the TIP and the schedule for TIP development Public Notice of TIP development published and posted
February (mid)	Participating jurisdictions return TIP project forms. A <i>Draft TIP</i> is prepared and sent to agencies for any changes in projects and budgets
April (early)	Technical Committee receives the Draft TIP Draft TIP distributed to MoDOT, FHWA, FTA and participating jurisdictions for 2 week review period
May (early)	Technical Committee meets – Final changes are made, Committee formulates recommendations to the Board of Directors
May (late)	Board receives draft TIP, discussion, Board initiates minimum 25 day public comment period
May (late)	The MPO publishes a Notice to the Public announcing the availability of the TIP, locations of documents, and the date of the Board of Directors meeting, when the TIP will then be considered.
June (late)	Board of Directors meets to consider recommendations of the Technical Committee and receive public comment.
July (late)	Board of Directors meets to consider recommendations of the Technical Committee and receive public comment. Board adopts TIP If Tip carries over for revisions, an additional comment period can be permitted (additional 30 days if required)
August (late)	Adopted TIP published and distributed to MoDOT for approval by Governor and incorporation into the State Transportation Improvement Program (STIP). MoDOT forwards Final TIP to FHWA and FTA
September	
October 1	Begin MODOT, FHWA, FTA Fiscal Year
November 1	Begin new MPO Fiscal Year

Appendix C - Estimated Timeline for Development of the Annual UPWP (this schedule may be revised as conditions warrant)

January	Notification to participating jurisdictions for work items for the UPWP Draft UPWP is prepared
February (early)	Technical Committee receives the <i>Draft</i> UPWP, meetings with representatives of member jurisdictions for revisions.
March (early)	Staff prepares budget for UPWP – 2 week review period Technical Committee meets, reviews UPWP, committee provides recommendations and/or other revisions.
April (early)	Budget review and approval by Technical Committee
April (mid)	Draft UPWP sent to the Board of Directors 1 weeks before the meeting,
April (late)	Board discussion on UPWP and budget, Board initiates public comment period
May (late)	Board meets, the agenda includes public comment period UPWP discussion. Board considers TC recommendations and approves the program as presented, or with modifications. MPO Resolution attached to approved UPWP
June (early)	Documents approved by Board are sent to MODOT with request for approval
July	Review period by MODOT, FHWA, FTA
September	Execute annual planning funds agreement
September	Documents distributed to Technical Committee, Board of Directors and member agencies
October 1	New State/Federal Fiscal Year
November 1	Begin new MPO Fiscal Year

Appendix F - Language Assistance Plan

Limited English Proficiency Plan



Capital Area Metropolitan Planning Organization

Draft February 12, 2014

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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).

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RESOLUTION 2014-01

A RESOLUTION OF THE CAPITAL AREA METROPOLITAN PLANNING ORGANIZATION ADOPTING THE LIMITED ENGLISH PROFICIENCY (LEP) PLAN

WHEREAS, in accordance with Title VI non-discrimination laws in regard to providing appropriate access to services and activities provided by federal agencies and recipients of federal assistance, the Limited English Proficiency Plan was drafted to define how CAMPO will accommodate persons with limited English Proficiency; and

WHEREAS, 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; and

WHEREAS, the plan has been developed in accordance with requirements of the Federal Highway Administration and the Federal Transit Administration; and

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Capital Area Metropolitan Planning Organization that the Limited English Proficiency Plan for the Jefferson City, Missouri metropolitan planning area is hereby approved and adopted.

Adopted this 19th day of February, 2014.



Jeff Hoelscher, Chairman

Attest:


Anne Stratman, Administrative Assistant

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 Proficiency¹, 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 Policy⁴

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

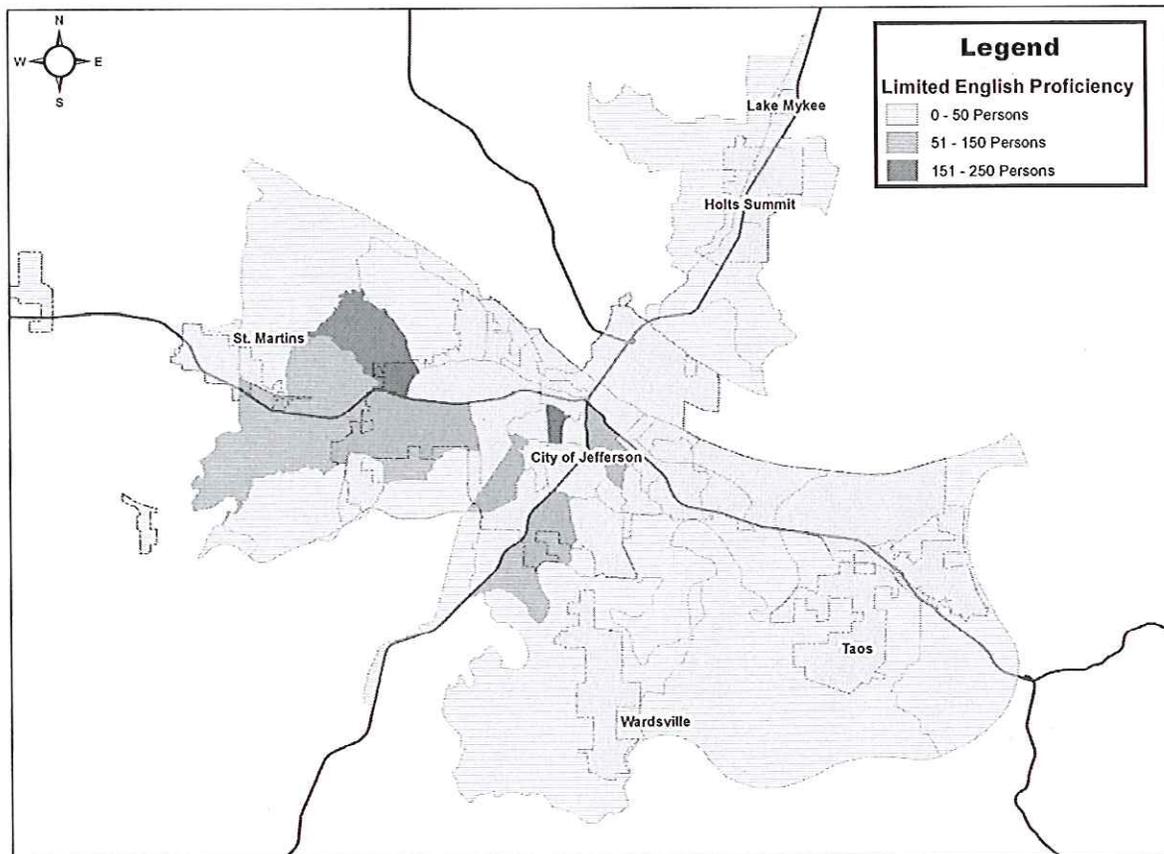
	Spanish Language Spoken at Home	Indo-European Language Spoken at Home	Asian and Pacific Islander Language Spoken at Home	Other Language Spoken at Home
5-17 years old	7	0	0	0
18-64 years old	51	0	27	8
65 and older	0	0	0	0
Total	58	0	27	8

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 Map⁷



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.

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.

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>