

RESOLUTION NO. 6 , 2016

**A RESOLUTION REAFFIRMING THE CITY'S COMMITMENT TO
NON-DISCRIMINATION AND INCLUSION BY ENDORSING GUIDELINES
ADOPTED BY THE OHIO-KENTUCKY-INDIANA REGIONAL COUNCIL OF
GOVERNMENTS FOR TITLE VI COMPLIANCE**

WHEREAS, the City of Montgomery is an active member in the Ohio-Kentucky-Indiana Regional Council of Governments (OKI); and

WHEREAS, the City has participated, and in the future will continue to participate, in OKI programs to fund infrastructure improvements within the City; and

WHEREAS, OKI has adopted guidelines to ensure appropriate Title VI policies and procedures are in place to prevent discrimination and to encourage inclusion in all federally funded OKI grant programs; and

WHEREAS, while the City has policies in place to prevent discrimination based upon race, gender, national origin and disabilities, the City Administration supports extending the City's policies to meet the guidelines adopted by OKI.

NOW THEREFORE, BE IT RESOLVED by the Council of the City of Montgomery, Hamilton County, Ohio, that:

SECTION 1. The City hereby accepts and endorses the OKI Title VI Program as amended January 9, 2014, revised October 8, 2014, and corrected July 30, 2015, a copy of which is attached hereto. The City Administration shall ensure that the policy and program requirements for Title VI compliance are met in all grant applications and contract administration of such grants for federally funded programs as required in such program guidelines.

SECTION 2. The City Manager is hereby designated as Program Coordinator with the authority to designate Project Coordinators from time to time to oversee compliance. The City Manager is authorized to adopt and/or revise such City policies as necessary to implement the OKI Title VI Program.

SECTION 3. This Resolution shall be in full force and effect from and after its passage.

PASSED: April 6, 2016

ATTEST: Connie M. Gaylor
Connie M. Gaylor, Clerk of Council

Christopher P. Dobrozi
Christopher P. Dobrozi, Mayor

APPROVED AS TO FORM:

Terrence M. Donnellon
Terrence M. Donnellon, Law Director

OKI Title VI Program

December 2013



Ohio-Kentucky-Indiana Regional Council of Governments
720 East Pete Rose Way, Suite 420
Cincinnati, Ohio 45202
513-621-6300
www.oki.org

The preparation of this document was financed cooperatively by the Federal Highway Administration, the Federal Transit Administration, the Commonwealth of Kentucky Transportation Cabinet, the Ohio Department of Transportation, the Indiana Department of Transportation, the units of local and county government in the OKI region. The opinions, findings, and conclusions expressed in this document are those of the OKI Regional Council of Governments and are not necessarily those of the U.S. Department of Transportation. This report does not constitute a standard, specification, or regulation.

Amended 1-9-14; Revised 10-8-14; Corrected 7-30-15

OKI 2014-02

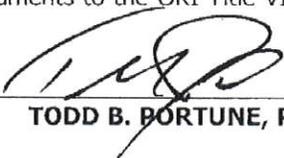
RESOLUTION
OF THE EXECUTIVE COMMITTEE
OF THE
OHIO-KENTUCKY-INDIANA REGIONAL COUNCIL OF GOVERNMENTS
AUTHORIZING ADOPTION OF AMENDMENTS TO THE
OKI TITLE VI PROGRAM

WHEREAS, the Ohio-Kentucky-Indiana Regional Council of Governments has adopted a Title VI Program that meets the legal requirements and responsibilities of the Federal Transit Administration (FTA) as a recipient of Federal financial assistance; and

WHEREAS, the Title VI Program continues to be reviewed by OKI staff on an on-going basis to ensure consistency with federal regulations and guidelines; and

WHEREAS, the amendments are consistent with FTA guidance; therefore,

BE IT RESOLVED, that the Board of Directors of the Ohio-Kentucky-Indiana Regional Council of Governments, at its regular public meeting of January 9, 2014, hereby adopts the amendments to the OKI Title VI Program as recommended by OKI staff.



TODD B. PORTUNE, PRESIDENT

fp
1/9/14

ACKNOWLEDGEMENTS

The Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Ohio Department of Transportation (ODOT), the Kentucky Transportation Cabinet (KYTC), and the units of local and county governments in the OKI region financed the preparation of this document cooperatively.

The opinions, findings and conclusions expressed in this document are those of the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and are not necessarily those of the U.S. Department of Transportation (U.S. DOT). This report does not constitute a standard, specification, or regulation.

OKI

Mark R. Policinski, Executive Director
Robert Koehler, Deputy Executive Director

Communications

Brian Cunningham, Communications and Legislative Affairs Director
Gayle Foster, Project Administrator
Florence Parker, Senior Planner and Public Involvement Specialist

Transportation Planning

Robyn Bancroft, Strategic Projects Manager
Mary Luebbbers, Demographer
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OKI Environmental Justice Advisory Committee Members

Adam Goetzman, Committee Chair, Green Township
Bernice Cooper, Freestore Foodbank
Erin Donovan, City of Fairfield Planning
Polly Doran, Council on Aging of Southwestern Ohio
Gina Douthat, Transit Authority of Northern Kentucky (TANK)
Andrew J. Fluegemann, ODOT – District 8
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Jenna Haverkos, Northern Kentucky Area Planning Commission
Greg Howard, Urban Appalachian Council
Joyce Kinley, Kinley and Associates
Cindy M. Minter, Campbell Co & Municipal Planning & Zoning Commission/Jacobs

TABLE OF CONTENTS

Introduction	
TITLE VI Policy Statement Assurances	2
• Attachment 1	
Contractual Requirements	4
• Attachment 2	
Clauses for Deeds, Licenses, Leases, Permits or Similar Instruments	6
TITLE VI Notification To The Public	7
TITLE VI Notice of Protections Against Discrimination	8
TITLE VI Complaint Procedure	9
TITLE VI Complaint Form	10
List of Transit-Related TITLE VI Investigations, Complaints and Lawsuits	12
Public Participation Plan – Summary of Outreach Efforts	13
Limited English Proficiency (LEP) Guidance	15
• Table 1.1 Selected Social Characteristics – Boone County	
• Table 1.2 Selected Social Characteristics – Campbell County	17
• Table 1.3 Selected Social Characteristics – Kenton County	
• Table 1.4 Selected Social Characteristics – Butler County	18
• Table 1.5 Selected Social Characteristics – Clermont County	
• Table 1.6 Selected Social Characteristics – Hamilton County	19
• Table 1.7 Selected Social Characteristics – Warren County	
• Table 1.8 Selected Social Characteristics – Dearborn County	20
Table Depicting Minority Representation on Committees and Councils Selected BY OKI	21
Subrecipient Assistance and Monitoring	22
Equity – Identification/Analysis of EJ Mobility Needs	25
• Demographic Profile	26
• Map – Minority Concentrations in the OKI Region	27
• Map – Minority and Non-Minority Population Distribution in the OKI Counties	28
• Transit Service Areas	29
• Distribution of Transportation Projects (TIP)	32
APPENDIX	35
APPENDIX A	36
• OKI Participation Plan	37

INTRODUCTION

The Ohio-Kentucky-Indiana Regional Council of Governments (OKI) is the regional planning and intergovernmental coordination agency for the Greater Cincinnati metropolitan area. OKI's planning area includes nearly 200 units of local governments in a Tri-state area comprised of Butler, Clermont, Hamilton, and Warren counties in Ohio; Boone, Campbell, and Kenton counties in Kentucky; and Dearborn County in Indiana. As the designated Metropolitan Planning Organization (MPO) for the Ohio, Kentucky and Indiana counties in its region, OKI is responsible for the development of a long-range plan and a short-range programming document for transportation, as well as other planning initiatives. Civic engagement efforts apply to the broad spectrum of transportation investments and impacts considered in metropolitan planning, as well as individual projects recommended by OKI.

In developing its Participation Plan, OKI replaced its former OKI Policy for Environmental Justice (EJ) (April 7, 2003) and OKI Policy for Public Involvement (November 12, 1998). The new plan addresses OKI's efforts to not only involve the public in transportation decision-making and the provisions for assessing the equity of transportation investments, but also provides a plan for inter-agency coordination and consultation with local governments. The plan is focused on OKI's transportation program, but it may also be applied to other programs at OKI or used by other agencies. The OKI Board of Directors adopted this Participation Plan on June 14, 2007.

As a public agency that receives federal funds and makes recommendations on federal expenditures, OKI is bound by Participation requirements for ensuring that federal funds are used fairly and without discrimination. And, per Title 49 U.S.C. Chapter 53, ensures that the requirements of its transportation planning processes are met for flexible funded projects, including project selection requirements.

The basis for Environmental Justice is Title VI of the Civil Rights Act of 1964, which states:

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

Public participation and civic engagement by public agencies are the result of a series of federal orders that serve to amplify Title VI. These include:

- Moving Ahead for Progress in the 21st Century Act (MAP-21) effective October 2012
- Federal Highway Administration Order in 1998
- U.S. Department of Transportation Order in 1997
- President Clinton issued Executive Order 12898 in 1994, which directed every federal agency to make EJ part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority and low income populations.
- The U.S. Department of Transportation issued Departmental Order 5610.2(a) (Actions to Address Environmental Justice in Minority Populations and Low-Income Populations). This Order updates the Department's original Environmental Justice Order 12898. The Order continues to be a key component of the Department's strategy to promote the principles of EJ in all departmental programs, policies, and activities.
- Section 504 of the Rehabilitation Act of 1973
For agencies like OKI, the Orders issued by federal departments clarified the need to involve the potentially affected public in transportation decision-making processes and assess the equity of transportation investments. The targets of the Participation Plan are the entire public, but provide for additional consideration of EJ populations of minority and low income populations. OKI has chosen to expand its efforts to also address elderly persons, people with disabilities, and zero-car households.
- President George W. Bush issued Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency", 2000 which requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them

The OKI Title VI Program provides an overview of how it operates its programs and services without regard to race, color, or national origin in accordance with the Title VI Civil Rights Act of 1964.

TITLE VI POLICY STATEMENT ASSURANCES

Ohio-Kentucky-Indiana (OKI) Regional Council of Governments (hereinafter referred to as the Sponsor) hereby agrees that as a condition to receiving Federal financial assistance from the Department of Transportation (DOT), it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d, et seq.) and all requirements imposed by 49 C.F.R. Part 21, - Nondiscrimination in Federally Assisted Programs of the Department of Transportation -- Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") to the end that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. As a federal-aid recipient the Sponsor understands that Title VI obligations apply to all projects and activities, regardless of the funding source. Without limiting the above general assurance, the Sponsor agrees concerning this grant that:

1. Each "program" and "facility" (as defined in Sections 21.23(e) and 21.23(b)) will be conducted or operated in compliance with all requirements of the Regulations.
2. It will insert the clauses of Attachment 1 of this assurance in every contract subject to the Act and the Regulations.
3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
4. Where Federal financial assistance is 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.
5. It will include the appropriate clauses set forth in Attachment 2 of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Sponsor with other parties:
 - (a) for the subsequent transfer of real property acquired or improved with Federal financial assistance under this Project; and
 - (b) for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.
6. This assurance obligates the Sponsor 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 Sponsor or any transferee for the longer of the following periods:

- (a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, or
 - (b) the period during which the Sponsor retains ownership or possession of the property.
7. It will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other sponsors, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants or Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.
8. It 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 Federal financial assistance for this Project and is binding on its contractors, the sponsor, subcontractors, transferees, successors in interest and other participants in the Project. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Sponsor.

DATED January 15, 2014

OKI Regional Council of Governments
(Sponsor)

By M. R. Policinski
(Signature of Authorized Official)

ATTACHMENT 1

CONTRACTOR CONTRACTUAL REQUIREMENTS

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 Sponsor or the Federal Aviation Administration (FAA) 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 Sponsor or the FAA, 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 the nondiscrimination provisions of this contract, the Sponsor shall impose such contract sanctions as it or the FAA may determine to be appropriate, including, but not limited to:

- a. Withholding of payments to the Contractor under the contract until the Contractor complies,
and/or
- b. Cancellation, termination, or suspension of the contract, in whole or in part.

6. Incorporation of Provisions. The Contractor shall include the provisions of paragraphs 1 through 5 in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Sponsor or the FAA 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 Sponsor to enter into such litigation to protect the interests of the Sponsor and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

ATTACHMENT 2

CLAUSES FOR DEEDS, LICENSES, LEASES, PERMITS OR SIMILAR INSTRUMENTS

The following clauses shall be included in deeds, licenses, leases, permits, or similar instruments entered into by the Sponsor pursuant to the provisions of Assurances 5(a) and 5(b).

1. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his 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 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 DOT 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 49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, and as said Regulations may be amended.

2. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his 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: (1) no person on the grounds of race, color, or national origin shall be excluded from participation in, 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 of services thereon, no person on the grounds of race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to 49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, and as said Regulations may be amended.

TITLE VI NOTIFICATION TO THE PUBLIC

Ohio-Kentucky-Indiana (OKI) Regional Council of Governments

- OKI Regional Council of Governments operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with OKI.
- For more information on OKI's civil rights program, and the procedures to file a complaint, contact 513-619-7686, 800-750-0750 (Ohio Relay Service), visit our administrative office at 720 East Pete Rose Way, Suite 420, Cincinnati, Ohio 45202 or, visit www.oki.org.
- If information is needed in another language, contact 800-750-0750.

OKI's Title VI Notification to the Public or Beneficiary Notice is also posted on the OKI website and in the Lobby area of the OKI office in both English and Spanish.

TITLE VI NOTICE OF PROTECTIONS AGAINST DISCRIMINATION

Ohio-Kentucky-Indiana (OKI) Regional Council of Governments operates its programs without regard to race, color or national origin.

To request or receive additional information on its discrimination obligations, including its complaint procedures, please contact the person listed below:

Florence Parker, Title VI Coordinator

OKI Regional Council of Governments

720 East Pete Rose Way – Suite 420

Cincinnati, OH 45202

Telephone: 513-619-7686

Ohio Relay Service: 800-750-0750

Email Address: fparker@oki.org

Website: www.oki.org

To file a discrimination complaint, the written complaint must be filed to the address above within 180 days of the alleged discrimination. To accommodate limited English proficient individuals, oral complaints to be documented and/or translated may also be given at the above address. Written complaints may also be filed with the U. S. Department of Transportation/Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA.

TITLE VI COMPLAINT PROCEDURE

Ohio-Kentucky-Indiana (OKI) Regional Council of Governments

This document is provided by the OKI Regional Council of Governments for a contractor, subcontractor, vendor or member of the general public to seek recourse if the individual is of the opinion that he or she has been unjustly served during the course of interaction with OKI and its transportation planning process.

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the OKI Regional Council of Governments (hereinafter referred to as "the Authority") may file a Title VI complaint by completing and submitting OKI's Title VI Complaint Form. The Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him or her whether the complaint will be investigated by our office.

The Authority has ten business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant via a letter. The complainant has ten business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his or her case.

After the investigator reviews the complaint, he or she will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, he or she has ten business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact 800-750-0750 (Ohio Relay Service).

**TITLE VI COMPLAINT FORM
Ohio-Kentucky-Indiana (OKI)
Regional Council of Governments**

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (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:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV:		
Have you previously filed a Title VI complaint with this Agency?	Yes	No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency _____		
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____		
<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
Section VI		
Name of agency complaint is against: _____		
Contact person: _____		
Title: _____		
Telephone number: _____		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Florence Parker, Title VI Coordinator
 OKI Regional Council of Governments
 720 East Pete Rose Way – Suite 420
 Cincinnati, OH 45202

**LIST OF TRANSIT-RELATED TITLE VI
INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

Investigations Complaints Lawsuits initiated	Date (Month,Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

As of the date of this submission no transit-related Title VI investigation, lawsuit or complaint has been filed with FTA against the Ohio-Kentucky-Indiana Regional Council of Governments.