# Harford Transit LINK

## 2018 – 2020 Title VI Implementation Plan

### Title VI of the Civil Rights Act of 1964

**Honorable Barry Glassman**

Harford County Executive

Adopted October 1, 2009

(Revised February 23, 2018)


Department Community and Economic Development

Leonard Parrish

Director

Harford Transit LINK

Gary Blazinsky

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This document is available in alternate format.

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# I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal aid recipients, sub-recipients, and contractors, whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and State transit dollars are used in a nondiscriminatory manner as required under Title VI.

This document details how Harford Transit LINK incorporates nondiscrimination policies and practices in providing services to the public.

## II. OVERVIEW OF SERVICES

Harford Transit LINK operates as part of an umbrella organization known as the Department of Community and Economic Development for Harford County, Maryland (hereinafter "Harford County"). Harford Transit LINK is a fixed-route public transit system that operates nine routes on weekdays and a Regional Route in partnership with Cecil County, Maryland. Harford Transit LINK also provides demand response services five days a week and during evening hours through our New Freedom Service for special populations. The routes connect major shopping and employment areas of Harford County. Of the nine routes, three operate primarily within the Towns of Bel Air, Aberdeen, and Edgewood. The remaining routes connect the population centers along the U.S. 40 corridor and Bel Air. The Regional Route connects with population centers in Cecil County and the Veteran's Administration Hospital at Perry Point, Maryland.

Harford Transit LINK provides creative and pragmatic planning and research to address current issues and to explore future needs and options that could benefit the County's citizens. It works closely with MTA and provides a solid base of technical competence for objective and innovative regional planning, in which the sum of regional and local expertise is greater than the individual parts. As a transit agency, Harford Transit LINK does not duplicate the activities of State agencies but supports their needs with complementary planning and advocacy. Harford Transit LINK performs strategic analyses of trends, consequences, and options, related to growth and transportation issues. It is a center for the collection, analysis, and dissemination of information vital to businesses, citizens, civic groups/organizations, and governments in the region.

### ***Our Mission***

The mission of Harford Transit LINK is to provide the public with a safe and efficient transportation system that increases access and mobility, reduces congestion, improves the environment, and supports economic development, thereby enhancing the quality of life throughout Harford County.

# III. POLICY STATEMENT AND AUTHORITIES

**Title VI Policy Statement**

Harford Transit LINK is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Harford County, Maryland's Office of Human Relations Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Signature of Authorizing Official – Honorable Barry Glassman
County Executive, Harford County, Maryland

2/27/18
Date

**Authorities**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Title 49 U.S.C. Chapter 53; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. §§ 4601 to 4605); Department of Justice regulation, 28 CFR Part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted); U.S. Department of Transportation (DOT) regulation, 49 CFR Part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR Part 771, "Environmental Impact and Related Procedures" (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR Part 450 and 49 CFR Part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, "U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations," (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

## IV. NONDISCRIMINATION ASSURANCES TO MTA

In accordance with 49 CFR § 21.7(a), every application for financial assistance from the FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the MTA submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub-recipients before passing through FTA funds.

As part of the Certifications and Assurances submitted to the MTA at the time of grant application and award—in our case, with the Annual Transportation Plan (ATP), the public transportation grant application—Harford Transit LINK submits a Nondiscrimination Assurance addressing compliance with Title VI as well as nondiscrimination in hiring, contracting, and nondiscrimination on the basis of disability.

In signing and submitting this assurance, Harford County, Maryland (i.e. Harford Transit LINK) confirms to MTA the County's commitment to nondiscrimination and compliance with federal and state requirements.

## V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Harford County, Maryland/Harford Transit LINK, Title VI Implementation Plan 2018 - 2020. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Harford Transit LINK's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

Signature of Authorizing Official – Honorable Barry Glassman
County Executive, Harford County, Maryland
Signing on behalf of Harford County LINK

2/27/18
Date

COUNTY COUNCIL

OF

HARFORD COUNTY, MARYLAND

Resolution No. 003-17

Legislative Session Day 17-004

February 7, 2017

Introduced by Council President Slutzky

at the request of the County Executive

A RESOLUTION authorizing the County Executive to file an application with the Maryland Transit Administration of the Maryland Department of Transportation for SSTAP (Statewide Special Transportation Assistance Program) and Section(s) 5303, 5304, 5305, 5307, 5309, 5310, 5311, 5316, 5317, 5318 Formula and Discretionary Operating and Capital grant programs under the Federal Transit Act, and for any additional transportation grant funds which may be available under the Federal Transit Act during the fiscal year.

WHEREAS, the Maryland Transit Administration is the designated recipient in Maryland for grants under the Federal Transit Act; and

WHEREAS, the Administrator of the Maryland Transit Administration of the Maryland Department of Transportation is authorized to make grants to counties and to local governments for mass transportation program projects; and

WHEREAS, the contract for financial assistance will impose certain obligations upon the applicant, including the provision by it of the local share of the project costs in the program; and

WHEREAS, it is required by the United States Department of Transportation in accordance with the provisions of Title VI of the Civil Rights Act of 1964 that, in connection with the filing of an application for assistance under the Federal Transit Act, the applicant give an assurance that it will comply with Title VI of the Civil Rights Act of 1964 and the United States Department of Transportation requirements thereunder; and

WHEREAS, it is the goal of the applicant that disadvantaged business enterprise, and possible in connection with this project, and that definite procedures shall be established and administered to ensure that disadvantaged business, and where applicable, minority business, shall have opportunities for construction contracts, supplies, equipment contracts or consultant and other services.

NOW, THEREFORE, BE IT RESOLVED by the County Council of Harford County, Maryland, that the filing of the aforesaid application be endorsed; and

BE IT FURTHER RESOLVED that the County Executive is hereby requested to endorse this resolution, thereby indicating approval thereof; and

11 BE IT FURTHER RESOLVED that copies of this resolution be sent to the Maryland Transit Administration of the Maryland Department of Transportation.

Richard C. Slutzky
President of the Council

Barry Glassman
County Executive

ADOPTED: February 14, 2017

# VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of Harford County, Maryland, and the Harford County Executive, the Harford County Department of Community Services' Human Relations Manager is responsible for ensuring implementation of Harford Transit LINK's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

**Overall Organization for Title VI**

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates. Internal education is conducted by the Harford County Law Department.

**Title VI Manager Responsibilities**

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are:

1. Process the disposition of Title VI complaints received.

2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of programs, (e.g., affected citizens, and impacted communities).

3. Conduct annual Title VI reviews of Harford Transit LINK to determine the effectiveness of program activities at all levels.

4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through Harford Transit LINK.

5. Monitors training programs on Title VI and other related statutes for Harford Transit LINK employees.

6. Prepare an annual report of Title VI accomplishments and goals, as required.

7. Develop Title VI information for dissemination to the public when appropriate, in languages other than English.

8. Identify and eliminate discrimination.

9. Establish procedures for, within 90 days, resolving deficiencies and writing the remedial action necessary.

**General Title VI Responsibilities of the Agency**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

### 1. Data Collection

To ensure that Title VI reporting requirements are met, the Title VI Manager maintains:

- A database/log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database/log.
- Documentation of public outreach and involvement is maintained.

### 2. Annual Report and Updates

As a sub-recipient of FTA funds, Harford Transit LINK must submit a Quarterly Report Log to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. Harford Transit LINK must also maintain and provide annually to the MTA the log of public outreach and involvement activities undertaken to ensure that minority and low-income people have meaningful access to these activities. The reporting form for the report will be submitted with the ATP as the MTA requests.

Further, Harford Transit LINK will submit to MTA updates to any of the following items since the previous submission (or a statement to the effect that these items have not changed since the previous submission, indicating date):

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Harford Transit LINK's Limited English Proficiency (LEP) plan based on Harford County's Four Factor Analysis
- Harford Transit LINK's procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints, or lawsuits filed with Harford Transit LINK since the last submission
- A copy of Harford Transit LINK's agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

The annual Title VI report and updates are submitted to the MTA each year as part of the Annual Transportation Plan (ATP), or grant application submission.

### 3. Annual Review of Title VI Program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager and the Harford Transit LINK's administrator will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they must review agency operational guidelines and publications,

including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

**4. Dissemination of Information Related to the Title VI Program**

Information on Harford Transit LINK's Title VI program is to be disseminated to Harford Transit LINK employees, contractors, and beneficiaries, and to the public, as described in the public outreach and involvement section of this document, and in other languages when necessary according to the LEP plan and federal and State law.

**5. Resolution of Complaints**

Any individual may exercise their right to file a complaint with Harford Transit LINK if that person believes that they or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by nondiscrimination requirements. Harford Transit LINK must report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the transit's Nondiscrimination Complaint Procedures, as described in Section VI above . All Title VI complaints and their resolution will be logged as described under Section VI above, and reported annually (in addition to the three-day requirement) to MTA.

**6. Written Policies and Procedures**

Harford Transit LINK's Title VI policies and procedures are documented in this Implementation Plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Title VI Annual Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

**7. Internal Education**

Harford Transit LINK's employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, transit's obligations under Title VI (and any LEP requirements based on Four Factor Analysis), and data that must be gathered and maintained. In addition, training will be provided when any Title VI related policies or procedures change, or when appropriate, in resolving a complaint (which may be for a specific individual or for the entire transit agency, depending on the complaint). Title VI training is the responsibility of the trainer for Harford Transit LINK.

**8. Title VI Clauses in Contracts**

In all federal procurements requiring a written contract or Purchase Order (DP), Harford Transit LINK's contract/DP will include the nondiscrimination clauses attached below. The Title VI Manager will work with the manager(s) and Administrator of Harford Transit LINK and the procurement officers for Harford County to ensure appropriate nondiscrimination clauses are included.

## Title VI Clauses in Contracts

**The text below, in its entirety, must be in all contracts to which Harford County is a party and that are subject to Title VI regulations. All of the text except the final section ("Incorporation of Provisions") should be included.**

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter "Contractor"), agrees as follows:

**1. Compliance with Regulations**

Contractor must comply with the regulations relative to nondiscrimination in federally assisted programs of the United States Department of Transportation (hereinafter "DOT", Title 49, Code of Federal Regulations, Part 21 (hereinafter "Regulations"), which are herein incorporated by reference and made a part of this contract.

**2. Nondiscrimination**

Contractor, with regard to the work performed by it during the contract, must not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor must not participate either directly or indirectly in discrimination prohibited by § 21.5 of the Regulations, including employment practices when the contract covers a program under Part B of the Regulations.

**3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment**

In all solicitations either by competitive bidding or negotiations made by Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by Contractor of Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, and national origin.

**4. Information and Reports**

Contractor must provide all information and reports required by the Regulations or directives issued pursuant thereto, and must permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration 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 must so certify to Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration as appropriate, and must set forth what efforts it has made to obtain the information.

**5. Sanctions for Noncompliance**

If Contractor does not comply with the nondiscrimination provisions of this contract, Harford County, Maryland must impose such contract sanctions as the Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration may determine to be appropriate, including, but not limited to:

• Withholding of payments to Contractor under the contract until Contractor complies; and/or

• Cancellation, termination, or suspension of the contract, in whole or in part.

**6. Incorporation of Provisions**

Contractor must include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. Contractor must take such action with respect to any subcontractor or procurement as Harford County, Maryland, Maryland Department of Transportation, Federal Highway Administration or the Federal Transit Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that if Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, Contractor may request Harford County, Maryland enter into such litigation to protect the interests of the State and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

**Part B**

**Lease/Deed Provisions**

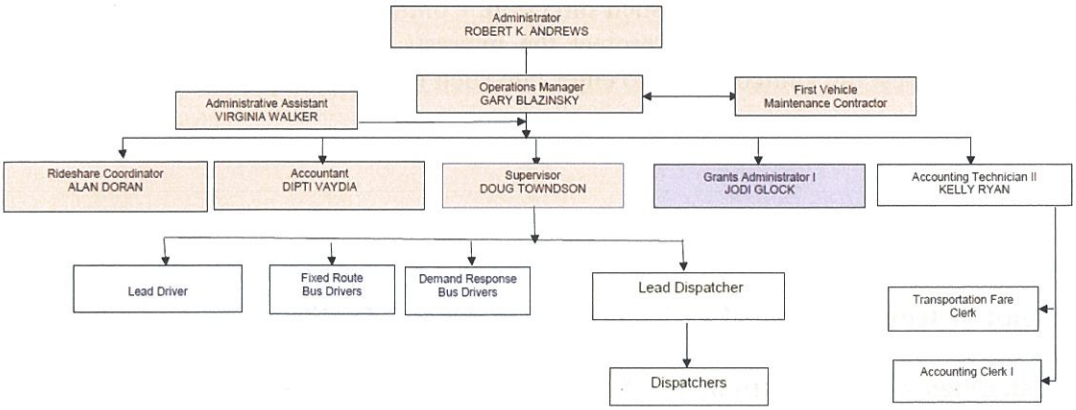
**Upon receipt of federal financial assistance to construct a facility or part of a facility, the Recipient agrees to include these clauses in all future deeds, licenses, leases, permits, or similar instruments entered into by Harford County, Maryland.**

**Assurances, item 7.**

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land, that if facilities are constructed, maintained, or otherwise operated on the said property described in this lease, for a purpose for which a Harford County program or activity is extended, or for another purpose involving the provision of similar services or benefits, the LESSEE must maintain and operate such facilities and services in compliance with all other requirements imposed by 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, as said Regulations may be amended; and that if any of the above nondiscrimination covenants are breached, the COUNTY may terminate the lease, and reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

Department of Community and Economic Development

**Harford Transit LINK**



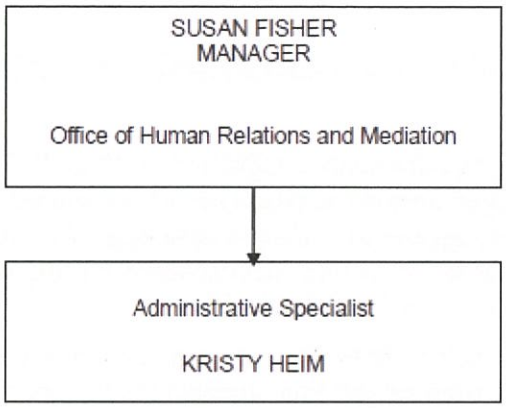

Revised: February 15, 2018

## DEPARTMENT OF COMMUNITY SERVICES

## OFFICE OF HUMAN RELATIONS ORGANIZATIONAL CHART

## 125 N. Main Street, Bel Air, Maryland 21014

The Department of Community Services' Office of Human Relations acts as a liaison for human relations matters between Harford County Government, various governmental and private agencies, and acts as Title VI Manager.



## GENERAL REPORTING REQUIREMENTS

### REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Harford Transit LINK must disseminate this information to the public by posting a Title VI notice on the it's website and in its public areas (bulletin board), including in federally funded vehicles. The Sample Public Notice is included as APPENDIX A - Title VI Notice to the Public; locations where posted are listed.

## TITLE VI COMPLAINT PROCEDURES

### REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

To comply with the reporting requirements established in 49 CFR § 21.9(b), all recipients must develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint must be available on the recipient's website and at their facilities.

Any individual may exercise their right to file a written complaint with Harford Transit LINK, if that person believes they have been subjected to unequal treatment or discrimination in the receipt of benefits or services. Harford Transit LINK will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the the Harford Transit Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution must be logged and reported annually (in addition to the three-day requirement) to the MTA. A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor — TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Harford Transit LINK includes the following language to the best of its ability on all printed information materials (within reason), on the agency's website, in press releases, in public notices, in published documents and on posters on the interior of each vehicle operated in passenger service:

**Title VI Notice to the Public — Printed Material Language**

Harford Transit LINK is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Harford Transit LINK's nondiscrimination policies and procedures, or to file a complaint email us humanrelations@harfordcountymd.gov or contact Susan Fisher, Manager, Office of Human Relations, 125 N. Main Street, Bel Air, MD 21014, sefisher@harfordcountymd.gov.

**Abbreviated Title VI Notice to the Public**

The following abbreviated version of the above paragraph may be used in publications where space or cost is an issue and in classified newspaper announcements:

Harford Transit LINK is committed to complying with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information on Title VI, go to http://www.harfordcountymd.gov/213/Harford-Transit-LINK or call 410-638-4739.

Instructions for filing Title VI complaints are posted on the Harford Transit LINK's website and on the interior of each vehicle operated in passenger service and Harford Transit LINK's facilities, and are also included within Harford Transit LINK's policy manual and Ride Guide brochure.

A copy of Harford Transit LINK's Title VI Complaint Form is attached as APPENDIX B.

## Procedures for Handling and Reporting Investigations/complaints and Lawsuits

Should any Title VI investigations be initiated by the FTA and/or MTA, or any Title VI lawsuits filed against Harford County, Maryland, it will follow these procedures:

**Procedures**

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with Harford County's Title VI Manager (Manager, Office of Human Relations).

   The complaint must meet the following requirements and must be filled as stated below:

   a. A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaint must be in writing and signed by the complainant(s). The attached complaint form must be provided to the complainant upon request. See Appendix B.

   b. The complainant should include:
      - The complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
      - The date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
      - A description of the alleged act of discrimination
      - The location(s) of the alleged act of discrimination (include vehicle number if appropriate)
      - An explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, or national origin
      - If known, the names and/or job titles of those individuals perceived as parties in the incident
      - Contact information for any witnesses
      - Indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)

c. The complaint must be submitted to the Title VI Manager at 125 N. Main Street, Bel Air, MD 21014 and /or humanrelations@harfordcountymd.gov

d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail the original signed document which was faxed or e-mailed.

2. The Title VI Manager will determine a complaint's jurisdiction, acceptability, need for additional information, and investigate the merit of the complaint. If a complaint is against one of Harford County's sub-recipients of federal funds, the Title VI Manager will investigate and adjudicate the case. For complaints against Harford Transit LINK, the Title VI Manager will notify MTA's Office of Equal Opportunity (OEO) and/or the Federal Transit Administration, as appropriate, within three business days, for proper disposition pursuant to their procedures. The Title VI Manager will also enter the complaint into the database/log.

3. Within three business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview. To be investigated, a complaint must meet the following criteria:
   a. The complaint must be filed within 180 calendar days of the alleged occurrence.
   b. The allegations must involve a covered basis of race, color, or national origin.
   c. The allegations must involve a program or activity of a federal-aid recipient, sub-recipient, contractor.
   d

4. The complainant must be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.

5. Once the Title VI Manager or the MTA decides to accept the complaint for investigation, the complainant and the respondent must be notified in writing of such determination within fourteen calendar days. The parties will be offered the opportunity to resolve their differences through mediation using the County's Community Mediation Program. The complaint will receive a case number and will then be logged into Harford County, Maryland's or MDOT's records identifying its basis and alleged harm, and the race, color, and national origin of the complainant.

6. If the Title VI Manager assumes the investigation of the complaint, it will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have thirty calendar days from the date of Harford County's written notification of acceptance of the complaint to furnish a response to the allegations.

7. If the Title VI Manager assumes the investigation of the complaint, within sixty calendar days of the acceptance of the complaint, Harford County, Maryland's investigator will prepare an investigative report for review by the Harford County Department of Law. The report must include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8. The Department of Law will review the report and associated documentation and will provide any appropriate comments or recommendations to the Title VI Manager within ten calendar days.
9. Any comments or recommendations from the Department of Law must be reviewed by Harford County, Maryland's Title VI Manager. The Title VI Manager will discuss the report and recommendations with the Director of Economic Development within ten calendar days. The report will be modified as needed and made final for its release.
10. Harford County, Maryland's, final investigative report and a copy of the complaint will be forwarded to MTA's OEO, within ninety calendar days of the acceptance of the complaint. The MTA's OEO will share the report with the appropriate organization within the Federal DOT and/or FTA, Washington Division Offices, according to the MTA's written polices as part of its Annual Title VI Update and Accomplishment Report.
11. Harford County will notify the parties of its findings, which are subject to concurrence from the MTA's OEO. MTA's OEO will issue the final decision to Harford County, Maryland based on Harford County, Maryland's investigative report.
12. Once the MTA's OEO issues its final decision, Harford County, Maryland, will notify all parties involved of such determination. MTA's final decision is not subject to an appeal.
13. A complaint may be dismissed by the Title VI Manager or the MTD OEO for the following reasons:
    a. The complainant requests the withdrawal of the complaint.
    b. The complainant fails to respond to repeated requests from the Title VI Manager for additional information needed to process the complaint.
    c. The complainant cannot be located or an interview cannot be scheduled after reasonable attempts by the Title VI Manager.

## TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

**Background**

Harford Transit LINK through the Title VI Manager must prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list must include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list must be included in the Title VI Program submitted to MTA every three years and information must be provided to MTA quarterly and annually.

**See Appendix C and C-1 for examples of forms.**

## PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

### Introduction

Public outreach and involvement applies to and affects Harford Transit LINK's mission and work program as a whole, particularly efforts and responsibilities related to Harford Transit LINK's service planning. The overall goal of Harford Transit LINK's public outreach and involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions by Harford Transit LINK. In seeking public comment and review, Harford Transit LINK makes a concerted effort to reach all segments of the population; including people from protected communities, and organizations identified as representing the protected classes. Harford Transit LINK utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Harford Transit LINK utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time as determined by our four-factor analysis.

that the PPP will guide how, when, and how often specific public participation activities should take place and which specific measures are most appropriate.

Harford Transit LINK will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, the frequency of requests for information and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at transit stations, stops, and in vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

### See Appendix D for:

### Examples/Summary of effective public outreach efforts that we may utilize.

# ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

**See Appendix E for LAP**

**LANGUAGE ASSISTANCE PLAN**

## Harford Transit LINK

## LANGUAGE ASSISTANCE PLAN FOR LEP PERSONS

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." This Executive Order requires federal agencies receiving financial assistance to address the needs of person with limited English proficiency. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. The following LEP language implementation plan, developed by Harford Transit LINK is based on FTA guidelines.

As required, Harford Transit LINK developed a written LEP Plan (below). Using 2015 and American Community Survey (ACS) Census data, Harford Transit LINK has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP Persons could be a significant market for public transit and reaching out to these individuals could help increase their utilization of transit. Therefore, it may make good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

As required by the MTA, Harford Transit LINK (through a county-wide effort) conducted a four-factor analysis in an effort to help determine whether additional language assistance services are needed, and if so, what types of services would be best to serve our LEP population.

The "four-factor analysis" process included:

1) Determining the number and proportion of LEP individuals within the population;
2) The frequency with which LEP individuals will encounter the program;
3) The importance of the program to people's lives; and
4) The resources available to provide translation services.

The four factors are more specifically outlined below.

### Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

**Factor 1:** **Assessment of the Number and Proportion of LEP Persons Likely to Be Served or Encountered in the Eligible Service Population**

**What the Guidance Says:**

*"The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed (emphasis added). Ordinarily, persons "eligible to be served, or likely to be directly affected, by'' a recipient's programs or activities are those who are in fact, served or encountered in the eligible service population. This population will be program-specific, and includes persons who are in the geographic area that is part of the recipient's service area...When considering the number or proportion of LEP individuals in a service area, recipients should consider LEP parent(s) whose English proficient or LEP minor children and dependents encounter the services of DOT recipients.*

*Recipients should first examine their prior experiences with LEP individuals and determine the breadth and scope of language services that are needed. In conducting this analysis, it is important to: Include language minority populations that are eligible beneficiaries of recipients' programs, activities, or services but may be underserved because of existing language barriers; and consult additional data, for example, from the census, school systems and community organizations, and data from state and local governments, community agencies, school systems, religious organizations, and legal aid entities.*

*The focus of the analysis is on lack of English proficiency, not the ability to speak more than one language. Note that demographic data may indicate the most frequently spoken languages other than English and the percentage of people who speak that language but speak or understand English less than well. People who are also proficient in English may speak some of the most commonly spoken languages other than English." (DOT LEP Guidance Section V (1)).*

Harford Transit LINK has reviewed census data on the number of LEP individuals in Harford County, as well as the languages they speak.

**U.S. Census Data – American Community Survey (2011-2015)**

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Harford Transit LINK's service area. The total population speaking English "not well" and "not at all" is 1.91% according to the ACS Census data provided by the MTA. After English, Spanish (and Spanish Creole) is the most commonly language, with Spanish speakers comprising 0.71% of Harford County's population.. The frequency and extent to which LEP individuals come into contact with Harford County government is estimated to be quite low. However, we believe any opportunity to increase public comment on long-range decision-making is a worthwhile investment. Harford Transit LINK encourages public comment on its policies, programs, and funding cycles, and therefore would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals. Harford County has limited resources to pursue translations services; however, the County believes that these services are a priority. By finding a low cost point of access for LEP individuals, the County would provide them with a way to learn about governmental activities and access all the services that are available to them.

Information from the ACS Census also provides more detail on the specific languages that are spoken by those who report that they speak English "not well" and "not at all." Languages spoken

at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Limited English Proficiency (LEP) populations in Harford County, Maryland**

| Total Population | 234,856 | |
|---|---|---|
| LEP Population | 4,492 | 1.91% |
| Five Largest LEP Populations | Persons | Percent |
| Spanish and Spanish Creole | 1677 | 0.71% |
| Korean | 417 | 0.18% |
| Chinese | 330 | 0.14% |
| Tagalog | 277 | 0.12% |
| Gujarati | 253 | 0.11% |

It is noted that there are relatively low numbers of LEP persons in the county—no language is spoken by over 5% and only one language has a total of more than 1,000 persons in the LEP population. Therefore, Harford County LINK provides translations of critical documents as noted throughout this plan.

Factor 2: The Frequency with which LEP Individuals encounter your programs, activities, and services.

**What the Guidance Says:**

*"Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed (emphasis added). The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily. Recipients should also consider the frequency of different types of language contacts, as frequent contacts with Spanish-speaking people who are LEP may require certain assistance in Spanish, while less frequent contact with different language groups may suggest a different and/or less intensified solution. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent. However, even recipients that serve LEP persons on an unpredictable or infrequent basis should use this balancing analysis to determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate.*
*It may be as simple as being prepared to use a commercial telephonic interpretation service to obtain immediate interpreter services. Additionally, in applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups."(DOT LEP Guidance Section V (2)).*

**Factor 2:** **Assessment of Frequency with Which LEP Individuals Come into Contact with Harford Transit LINK**

Harford Transit LINK reviewed its relevant benefits, services, and information and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Calls to Harford County's Language Link customer service telephone line;
- Visits to the Harford Transit LINK's headquarters, i.e.: contact with office managers and staff;
- Attendance at community meetings or public hearings hosted by Harford Transit LINK;
- Contact with the Harford Transit LINK's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers).

**LEP Services Provided by Harford County**

Records of language translation usage since the county's Department of Community Services first contracted for services: **For a Summary of Findings please refer to the list below and the Chart on the next page:**

| Year | Amount | Primary Usage Details |
|---|---|---|
| FY 03 | $155.00 | Short telephone translation and Department of Housing and Community Development on-site |
| FY04 | $1,233.30 | Housing Agency and State's Attorney's Office |
| FY 05 | $444.03 | State's Attorney's Office and Sheriff's Office |
| FY06 | $290.61 | State's Attorney's Office and Office on Aging |
| FY07 | $763.52 | Sheriff's Office, Harford County Public Library (HCPL) and Dept. of Community Services |
| FY08 | $288.81 | Office on Aging and Revenue Collection |
| FY09 | $609.95 | Revenue Collections, HCPL and Family Support Division, State's Attorney's Office |
| FY10 | $1,776.77 | Family Support Division, State's Attorney's Office, Evidence Translation, HCPL |
| FY11 | $4,055.66 | State's Attorney's Office, HCPL, Revenue Collection |
| FY12 | $433.04 | Board of Election, Human Relations, State's Attorney's Office |
| FY13 | $707.12 | State's Attorney's Office, Department of Community Services |
| | | |
| FY16 | $4.33 | State's Attorney's Office, Community Services |
| FY17 | $1,496.56 | State's Attorney's Office and there is a $440 charge for a Transit "Ride Guide" |

| Language Translation Services Usage by Service and Language | | | | | |
|---|---|---|---|---|---|
| FY | Total Contacts | Document / Language | On-Site / Language | Telephonic / Language | Video Transcript / Language |
| 2003 | 9 | | | 9/6 Spanish; 2 Vietnamese; 1 Turkish | |
| 2004 | 12 | | 7/Spanish | 5/Spanish | |
| 2005 | 10 | | 2/Spanish | 8/2 Chinese; 6 Spanish | |
| 2006 | 7 | | 1/Greek | 6/3 Spanish; 1 Chinese; 1 German; 1 Urdu | |
| 2007 | 10 | 2/Spanish | | 8/6 Spanish; 2 Cantonese | |
| 2008 | 13 | 1/Spanish | | 12/1 Thai; 11 Spanish | |
| 2009 | 9 | 4/Spanish | | 5/Spanish | |
| 2010 | 11 | 5/4 Spanish; 1 German | | 3/2 Spanish; 1 Punjabi | 1/English and Spanish |
| 2011 | 18 | 9/6 Spanish; 3 German | | 9/7 Spanish; 1 Korean; 1 Russian | |
| 2012 | 5 | 2/Spanish | 1/Spanish | 2/Spanish | |
| 2013 | 13 | 5/1 Spanish; 3 German; 1 Turkish | | 8/5 Spanish; 3 Urdu | |
| 2014 | 3 | | | 3/Spanish | |
| 2015 | | 3/Spanish | | 1/Spanish | |
| 2016 | 3 | 3/Spanish | | | |
| 2017 | 1 | 5/1Portugese, 4 Spanish | 1 Spanish | | |

Harford County will continue to try to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to assess the frequency of contact.

To assist in language identification, we use a language identification flashcard based one developed by the U.S. Census Bureau. (http://www.lep.gov/ISpeakCards2004.pdf)

**Information from Community Organizations that Serve LEP Persons**

To supplement the Census, education, and labor data, Harford Transit LINK may consider whether appropriate outreach to LEP persons would increase frequency of contact with LEP groups if it is deemed that the frequency of contact warrants it.

Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

**What the Guidance Says:**

*"The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed (emphasis added). The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual..." (DOT LEP Guidance Section V( 3)). "providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."* (DOT LEP Guidance Section V (4)).

**Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population**

Harford Transit LINK provides the following programs, activities and services:

Harford Transit LINK operates ten public bus routes including the Cecil/Harford Connect JARC (Job Access and Reverse Commute program) Route. The Harford County routes operate Monday through Friday by primarily serving the County's population centers in Havre de Grace, Aberdeen, Bel Air, Edgewood, Joppa and points in between by linking citizens with various destinations such as places of employment, educational services, medical treatment facilities, senior centers and other places of commerce.

Harford Transit LINK also provides specialized transportation services in Harford County through its curb-to-curb service for the elderly and persons under the age of 60 with disabilities or low income.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, the frequency of services needed seems to be very low. Harford Transit LINK will continue to monitor the frequency of requests and then evaluate based on the services requested which (if any) routes or services are of particular importance LEP persons in the community.

The following are believed to be the most critical services provided by Harford Transit LINK for all customers, including LEP persons.

- Safety and security awareness instructions
- ADA paratransit services, including eligibility process (in Ride Guide)
- ADA/Reduced Fare Application and letter
- Language Link Information
- Ride Guide

Factor 4: The Resources Available to the Recipient and Costs

This last step in the four-factor analysis will allow your agency to weigh the demand for Language assistance against the agency's current and projected financial and personnel resources. This analysis should help your agency determine if the language services it currently provides are cost effective and should also help agencies plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of agency resources.

**What the Guidance Says:**

*"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. (emphasis added). Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. Resource and cost issues, however, can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, affected populations, and Federal agencies." (Section V (4)).*

The DOT LEP Guidance also notes that, *"large entities and those entities serving a significant number or proportion of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to be able to articulate, through documentation or in some other reasonable manner, their process for determining what language services would be limited based on resources or costs."* (Section V (4)).

**Factor 4: Assessment of the Resources Available to Harford County and Costs**

The following language assistance measures are currently being provided by Harford County in general as well as Harford Transit LINK.

As you will note from the above text and chart, LEP services in Harford County are very infrequently requested. The estimated staff needed for the infrequent use of these services is practically zero (because the costs are borne by the County). Harford County outsources these services as listed above.

Based on the chart and text above Harford County does not believe that there will be a significant increase in these activities and costs will likely stay relatively stable. As we notice spikes in requested services, Harford County will then reassess the need for services and increased cost.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Harford Transit LINK has determined that the services currently provided are meeting the needs of the LEP community. Harford Transit LINK will continue to track the information as stated in this plan and asses the future needs as appropriate.

**Resources**

The available budget that would be devoted to additional language assistance expenses will be based on the frequency and types of services determined to be needed. As mentioned above, this amount is likely to stable over the near future.

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

## LEP Implementation Plan

Conclusion: Developing the Right Mix of LEP Services

Harford County, Maryland's four-factor analysis helped determine that we need to continue offering services to the LEP Population to ensure their full participation in the community. The specific steps that will be taken will depend on the information we regularly gather from Census and other data, from fieldwork with LEP individuals and the organizations that serve them, and from our analysis of agency resources and the costs of providing language assistance.

Current Services provided to the LEP Population (Above the recommended requirements) ACTION:

Based on Harford County, Maryland's four-factor analysis, Harford County has established the following policy for providing information to individuals with LEP:

Harford County, Maryland is always seeking opportunities to increase opportunities for public comment on its activities, including policies, programs, and funding cycles. Harford County is particularly interested in increasing opportunities for historically underserved populations to provide input regarding its planning and housing rehabilitation activities. We will continue to analyze various reports and Census data to determine if there may be a need for other translation services. Pending confirmation of these findings Harford County will continue to provide language services.

Recognizing that providing language translation services up and above the DOT recommendations helps enable LEP residents speaking a variety of languages to acquire information regarding Harford County's human services, Harford County has signed contracts with State of Maryland vendors of telephonic, on-site, and document translation services. These contracts provide translation for hundreds of languages and assist employees in providing services to LEP residents calling or walking in, as well as providing on-site translators and document translation services. Harford County has appointed the Department of Community Services as the overseer of the LEP services to ensure that they are advertised to the community and available to all. Instructions for providing service to individuals with limited English proficiency can be found below. Harford County employees may also receive a "Point Card" for walk-in translation services by contacting Rachel Harbin, Department of Community Services at 410-638-3373 or by email at raharbin@harfordcountymd.gov.

Specific transportation related usage of the LEP services:

To ensure that all of Harford Transit LINK's transportation services are accessible to LEP persons, Harford County Transit continues to have access to and promote the LEP services listed below. Transit employees are able to immediately access over the phone translation for any language whether over the phone or in person. In addition, printed materials such as Harford Transit LINK's Ride Guide can be translated into any language as requested by a LEP person.

Although the four-factor analysis, and all of the data collected since 2003 data shows that very few documents are requested by persons with LEP. Harford Transit LINK continues to strive to serve LEP individuals as stated in the above text. At this time, defining specific documents that are most needed would be somewhat premature. But Harford Transit LINK has determined that translation of certain documents into Spanish would be most feasible to print as requested:

- Application for reduced fare (or services provided as stated in the Translation Services and LEP Practices guidelines for LEP individuals)
- ADA Paratransit application package,
- Passenger policies and procedures
- Safety & Security information sheet
- Harford County Current Translation Services and LEP Practices

**Staff Access to Language Assistance Services**

Harford Transit LINK staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

**Responding to LEP Callers**

Harford Transit LINK staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

**Responding to Written Communications from LEP Persons**

Harford Transit LINK staff that comes into contact with LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

**Responding to LEP Individuals in Person**

Harford Transit LINK staff that encounters LEP persons can access language services by following the instructions listed on the "Harford County Current Translation Services and LEP Practices" instruction sheets found on pages 41 - 42 of this document.

When an LEP person has a question on board a Harford Transit LINK vehicle, the bus operator should hand them a copy of the translation services available as stated on pages 41–42 of this document.

**Staff Training**

As noted previously, Harford Transit LINK staff are with a list of available language assistance services as stated on Pages 41–42 of this document.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of Harford Transit LINK's responsibilities under the DOT LEP Guidance;
- A summary of Harford Transit LINK's language assistance plan;
- A summary of the number and proportion of LEP persons in Harford Transit LINK's service area, the frequency of contact between the LEP population and programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that Harford Transit LINK's is currently providing and instructions on how staff can access these products and services.

Also, staff who routinely come into contact with customers, as well as their supervisors and all management staff, receives tri-annual refresher training on policies and procedures related to assisting LEP persons.

**Providing Notice to LEP Persons**

LEP persons are notified of the availability of language assistance through the following approaches:

- Harford Transit LINK's Title VI policy statement included as a vital document
- Through signs posted on our vehicles and in our customer service and administrative offices
- Through ongoing outreach efforts to community organizations, schools, and religious organizations for major service changes or fare increases
- Use of Harford County's "Translation Services and LEP Practices" instruction sheets

LEP persons will also be included in all community outreach efforts related to major service changes and fare increases.

**Monitoring/updating the plan**

This plan is updated periodically, as directed by the FTA/MTA (at least every three years) based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Harford Transit LINK will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, internal meetings with staff who assists LEP persons, review of updated Census data, of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

Based on the feedback received from community members and agency employees, Harford Transit LINK will make incremental changes to the type of written and oral language assistance provided and to our staff training and community outreach programs. Because the cost of proposed changes and the available resources will affect the enhancements that can be made, Harford Transit LINK will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Harford Transit LINK will strive to address the needs for additional language assistance.

## MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR § 21.5(b)(1)(vii) states that a recipient of federal funds may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

Harford Transit LINK does not have a transit-related planning board, advisory council or committee.

# VII. REQUIREMENTS OF TRANSIT PROVIDERS

## REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive federal financial assistance, including state and local governments, regional entities, and private parties.

Transit providers that are sub-recipients of federal funds must submit the information to the primary recipient (the entity from whom they receive transit funds) every three years on a schedule determined by the FTA/MTA and the primary recipient. The requirements are scaled based on the size of the fixed-route transit provider.

Harford Transit LINK's: Title VI System-Wide Standards and Policies
Harford Transit LINK, an agency of the Harford County, Maryland government, operates fixed route service within Harford County.

Harford Transit LINK's mission is to enhance the quality of life in Harford County by providing the public with a safe and efficient transportation system that increases access and mobility, reduces congestion, improves the environment, and supports economic development.

**Overview of Routes**

Harford Transit LINK operates ten public bus routes and one regional route with Cecil County, operating Monday through Friday by primarily serving the County's population centers in Havre de Grace, Aberdeen, Bel Air, Edgewood, Joppa and points in between by linking citizens with various destinations: places of employment, educational services, medical treatment facilities, senior centers, and other places of commerce. These routes run 5:40 a.m. to 8:30 p.m.

- Route 1& 1A (Green Line): Havre de Grace, Aberdeen, Bel Air
- Route 2 & 2A (Blue Line): Joppatowne, Abingdon, Edgewood, Bel Air
- Route 3 (Orange Line): Bel Air Circulator
- Route 4 (Yellow Line): Aberdeen Circulator
- Route 5 (Red Line): Edgewood Circulator
- Route 6 & 6A (Purple Line): Aberdeen, Perryman, Riverside, Edgewood
- Route 7 (Teal Line): Aberdeen, Havre de Grace, Perryville (Regional Route)
- Route 8 (Silver Line): Perryman/Riverside Express

The following standards and polices address how Harford Transit LINK's fixed-route services are distributed across the system and ensure that service design/operations do not discriminate based on race, color, or national origin. The standards and policies fulfill the requirements in FTA Circular 4702.1B "Title VI Requirements and Guidelines for FTA Recipients." (Please refer to Appendix G for related population, demographic and route maps.)

**Service Standards**
Per FTA Circular 4702.1B, service standards are required: vehicle load, vehicle headway, on-time performance and service availability.

**Vehicle Load**

Vehicle load is a ratio expressed as the number of passengers on a bus as a percentage of the total number of seats. Vehicle loads greater than 100 % indicate standees, and may affect passenger comfort and safety. Harford Transit LINK's vehicle fleet includes vehicles with varying seating and standee limitations; however, the load standards below apply to all vehicle types.

| | Bus Routes |
|---|---|
| Peak | 127% maximum average |
| Off-Peak | 100% maximum average |

**Vehicle Headway**

Vehicle headway is the amount of time between two vehicles on a route, measured in minutes and stated in published schedules. Headway is related to frequency—the shorter the vehicle headway, the more frequent the service. Within the system, current headways range from 45–90 minutes on our fixed routes. These headways are based on population density and service demand.

| | Bus Routes |
|---|---|
| Monday–Friday Peak | 90 minute maximum |
| Monday–Friday Off-Peak | 60 minute maximum |

**On-Time Performance**

On-time performance is a measure of dependability and schedule adherence, based on the percentage of runs completed as scheduled. Harford Transit LINK defines "on-time" as 0 to 10 minutes late, with no vehicle leaving a time point early. On-time performance is determined at origins, destinations, and specific time points on each route. On-time performance is measured by daily random checks performed and recorded by dispatchers. If it is determined that a driver is ahead of schedule, the manager is notified and a meeting is set with the driver to discuss necessary improvement.

| | Bus Routes |
|---|---|
| Percent On-time | 83.27% |

**Service Availability**

Service availability refers to the distribution of fixed routes within Harford County. Harford County varies greatly in population density and land use patterns and thus necessitates a range of Harford Transit LINK services. Service availability is measured by both the distance between bus stops (stop spacing) and the percentage of residents within a certain distance of a route or stop (population coverage). Stop Spacing affects the average speed of service, creating a tradeoff of maximizing availability and maintaining reasonable travel times. Likewise, offering coverage to as many Harford County residents as possible must be balanced with the priority of serving high ridership areas more frequently.

| | Bus Routes |
|---|---|
| Stop Spacing | Minimum of every ¼ to ½ mile within Harford County as safety permits and where the speed limit is less than 40 mph. Where there are greater distances Harford Transit LINK will honor customer requests for a flag stop, where stops are separated by more space, as long as it is safe to stop (according to our Policy Manual) and board passengers. |

**Service Standards**

Per FTA Circular 4702.1B, service policies are required: Harford Transit LINK amenities and vehicle assignment.

**Distribution of Amenities**

Harford Transit LINK amenities are "items of comfort, convenience, and safety" available to riders. They include but are not limited to: seating, shelters/canopies, and information (signs, maps, schedules and digital displays). The distribution of amenities throughout the system is generally a function of ridership. Harford Transit LINK distributes Harford Transit LINK amenities equitably throughout our service area based on boarding levels. It will prioritize major transfer points and stops along multiple routes.

**Vehicle Assignment**

Vehicle assignment is the process by which vehicles are placed into service throughout the system. The Harford Transit LINK vehicle fleet includes a range of vehicle ages. All vehicles are equipped with bike racks and wheelchair ramps or lifts. Vehicles are assigned to routes based on ridership demand.

All buses are of a similar seating size and features and thus assigned at random, without regard to age or service area.

**Monitoring Title VI Complaints**

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the investigation examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes, and fare policy.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, the Title VI Manager conducts this review as part of preparing the annual grant application (ATP) for submission to the MTA.

**Fare and Service Changes**

Harford Transit LINK follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed major service or fare change, Harford Transit LINK considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for major changes to existing services or fares, as well as new services, have a goal of providing equitable service.

**BARRY GLASSMAN**
HARFORD COUNTY EXECUTIVE

**BILLY BONIFACE**
DIRECTOR OF ADMINISTRATION

**LEONARD PARRISH**
DIRECTOR OF COMMUNITY AND ECONOMIC DEVELOPMENT

## Appendix A

# YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

## Harford Transit LINK's Nondiscrimination Policy

Harford Transit LINK is committed to ensuring that no person is excluded from participation in or denied the benefits of transit services we offer consistent with the requirements of Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. § 2000d).

If you believe you have been subjected to discrimination under Title VI based on your race, color, or national origin, then you may file a complaint.

Complaints may be filed within one-hundred-eighty (180) days following the date of the alleged discriminatory action. Complaints may filed in writing using the complaint form found at http://www.harfordcountymd.gov/DocumentCenter/View/950

If you have any questions or concerns or would like the complaint form and/or additional information regarding Title VI, please contact the Harford County Office of Human Relations:

**Susan E. Fisher, Manager**
**Office of Human Relations**
**125 N. Main Street**
**Bel Air, MD 21014**

**410-638-4739**

Note: This notice is posted on our website, transit office bulletin board, and in all federally funded vehicles.



*MARYLAND'S NEW CENTER OF OPPORTUNITY*
410.638.3059 | 410.879.2000 | TTY Maryland Relay 711 | www.harfordcountymd.gov
2021 Pulaski Highway, Suite D, Havre de Grace, MD 21078
THIS DOCUMENT IS AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST

# Appendix B

HARFORD COUNTY HUMAN RELATIONS COMPLAINT FORM
(Under provision of Chapter 95 of the Harford County Code)

Please fill in the information below as completely as possible and return this form to the Office of Human Relations, 125 N. Main Street., Bel Air, MD 21014, (410) 638-4739, humanrelations@harfordcountymd.gov.

| **COMPLAINANT INFORMATION** | | | |
|---|---|---|---|
| Name: | Telephone: | Email: | |
| Street Address: | City: | State: | Zip: |
| Mailing Address: | City: | State: | Zip: |
| **RESPONDENT INFORMATION** | | | |
| Name: | Telephone: | | |
| Street Address: | City: | State: | Zip: |
| Mailing Address: | City: | State: | Zip: |
| **ALLEGED DISCRIMINATORY INCIDENT** | | | |

| **Basis for Discrimination:** *Check all that apply.* | | **Discriminatory or Wrongful Practice Involving:** *Check all that apply.* | |
|---|---|---|---|
| ☐ Race | ☐ Occupation | ☐ Administration of Justice | ☐ Governmental Services |
| ☐ Creed | ☐ Marital Status | | |
| ☐ Color | ☐ Political Opinion | ☐ Education | ☐ Housing |
| ☐ Sex | ☐ Personal Appearance | ☐ Employment | ☐ Public Accommodations |
| ☐ Origin | ☐ Mental Handicap | ☐ Other: *Please specify.* | |
| ☐ Age | ☐ Physical Handicap | | |
| Give the name, address and telephone number of any other agency you contacted about this complaint: | | Have you filed a complaint with the Office of Human Relations previously? ☐ Yes ☐ No<br><br>Date of Previous complaint: _____ | |
| How did you hear about the Office of Human Relations? | | | |

| Date of Incident: | Time of Incident: |
|---|---|
| Did anyone witness the events you described above? ☐ Yes ☐ No Please list the name, address and telephone number (if possible) of this person(s): | |
| Describe what happened: | |
| Parties to complaints may voluntarily resolve their differences without an extensive investigation or expenditure of resources by participating in a mediation process. Are you interested in participating in such a process? ☐ Yes ☐ No | |

I do hereby attest that I have submitted the foregoing complaint and to the best of my knowledge, it is true and correct.

_____ _____

Signature of Complainant Date

Notary Public: _____ Commission expires: _____

# Appendix C

Title VI List of Investigations, Lawsuits and Complaints
Harford Transit LINK

| List of Investigations Lawsuits and Complaints | Date Include (Month, Day, Year) | Summary Include basis of complaint: Race, Color or National Origin | Status | Action Taken |
|---|---|---|---|---|
| Investigation Number 1 | | | | |
| Investigation Number 2 | | | | |
| Investigation Number 3 | | | | |
| Investigation Number 4 | | | | |
| | | | | |
| Lawsuit Number 1 | | | | |
| Lawsuit Number 2 | | | | |
| Lawsuit Number 3 | | | | |
| Lawsuit Number 4 | | | | |
| | | | | |
| Complaint Number 1 | | | | |
| Complaint Number 2 | | | | |
| Complaint Number 3 | | | | |
| Complaint Number 4 | | | | |

# Appendix C – 1

TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS LOG (example)

*In order to comply with 49 CFR Section 21.9(b), recipients and sub-recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or sub-recipient that allege discrimination on the basis of race, color, or national origin.*

*Agencies awarded Federal grants through the Maryland Transit Administration (MTA) must complete this log at the end of each quarter and at the end of each Fiscal Year, providing the requested information. Specified data is required each quarter, as instructed below. Certain information is required only at the end of the Fiscal Year, as instructed below. End-of-year information must be provided in print and electronically, using Microsoft Word.*

**Note: The Investigations, Complaints & Lawsuits Log must be submitted with your Quarterly Request for Payment.**

**AGENCY:** Harford Transit LINK

**TITLE VI OFFICER:** Susan E. Fisher

**E-MAIL:** sefisher@harfordcountymd.gov. **CONTACT #:** 410-638-4739

**FISCAL YEAR** FY 12

**REPORTING PERIOD** (check appropriate box):

☐ 1ST Quarter (Jul-Sep) ☒ 2nd Quarter (Oct-Dec) ☐ 3rd Quarter (Jan-Mar) ☐ 4th Quarter (Apr-June) ☐ Complete Fiscal Year (Jul-June)

1. Were any investigations, lawsuits or complaints filed during this time period? 0
2. If YES, please provide the following information for each investigation, lawsuit or complaint received during this time period:
   - Date the investigation, lawsuit or complaint was filed, and
   - Summary of the allegation(s) and status if resolved.
3. Based on the investigations, lawsuits or complaints filed during the Fiscal Year, please provide a status of each allegation. **(Report on separate paper at the end of the Fiscal Year).**
4. Please indicate if or what actions were taken by the recipient or sub-recipient in response to the investigation, lawsuit or complaint. **(Report on separate paper at the end of the Fiscal Year).**

# Appendix D

**Procedures for notifying the public of Title VI rights and how to file a complaint**

Harford Transit LINK includes the following language on printed information materials (within reason), on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

**Principles of Harford Transit LINK's Communications & Public Involvement Program**

Communications and Public Involvement applies to and affects Harford County's work program as a whole, particularly agency efforts and responsibilities related to Harford Transit LINK's Transportation Planning Program Area. The goal of Harford Transit LINK's General Communications and Public Involvement policy is to secure early and continuous public notification about, and participation in, major actions and decisions by Harford Transit LINK. In seeking public comment and review, Harford Transit LINK makes a concerted effort to reach all segments of the population, including people from protected communities, and organizations representing these and other protected classes. Harford Transit LINK utilizes a broad range of public information and participation opportunities, process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

**Elements of Harford Transit LINK's Communications & Public Involvement Program**

- **Website** – Harford Transit LINK maintains a website, (as part of Harford County, Maryland's website) www.harfordcountymd.gov/services/transportation, which is updated as new information becomes available. The site includes information on the agency's responsibilities, programs, publications, meeting dates, and news items, contact information; a search function, the Title VI Plan, complaint procedures, and complaint form. We also developed a website place where you can email Harford Transit LINK to help encourage people to participate in several ways such as: signing up to receive text messages and e-mail updates for attending meetings, requesting a speaker, or contacting the office for other information.
- **Publications** – Each year or as needed, Harford Transit LINK issues publications, reports and maps as part of the agency's work program and respond to and processes a number of data requests. The information is used by planning agencies and various departments throughout the county/region, and can be accessed by the public through Harford Transit LINK's website www.harfordcountymd.gov/services/transportation or by submitting specific requests to our office: 1311 Abingdon Road, Abingdon, MD 21009.
- **Press releases** – Press releases are occasionally sent to local and regional media outlets including daily and weekly newspapers, TV stations, and radio stations. Press releases may include the abbreviated Title VI Notice to the public and contact information for agency staff.
- **Opportunities for public comment** – Harford Transit LINK provides opportunities for public comment, and continues to work to find new and innovative ways to solicit public comments and involve all segments of the population in Harford County, Maryland. Comments are accepted by phone, fax, e-mail, U.S. mail, and in person at any of the meetings. See the section below entitled "Opportunities for Public Comment" for details.

- **Harford Transit LINK's Staff is accessible** – Staff is accessible in person, on the phone or TTY, by mail, by fax, by e-mail, or by online comment forms. Contact information for Harford Transit LINK's staff is provided on the agency's website.
- **Mailings** – Harford Transit LINK may use direct mail to keep the public informed of the agency's programs, public comment periods, meetings, and publications. See the next section for details.
- **Events** – Events such as workshops, open houses, and forums are held as deemed necessary.

**Opportunities for Public Comments**
Harford Transit LINK offers several different ways for people to comment on activities, programs, and decisions made at the agency as follows:
- **Comments are accepted at any time** – Comments are accepted via an online comment form, or by phone, fax, e-mail, U.S. mail, and in person at the office or during any community meeting or event. Contact information for staff is provided on the agency website and contact information (as required) is included in every publication produced by Harford Transit LINK.
- **Formal public comment periods for major activities** – Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, Harford Transit LINK's Annual Transportation Plan (ATP) report, major changes to important Harford Transit LINK policies, and major updates to the Transportation Development Plan. Generally, information is reviewed and released during a public hearing. The comment period is highlighted in the newspaper notification and on the home page of the website, and legal notices are distributed throughout the County. Comments can be made in person at any public meeting, using a comment form to be added on the agency's website, by e-mail, by U.S. mail or fax. Harford Transit LINK responds to comments received when appropriate, and forwards comments to other agencies for a response when appropriate. Comments and responses received throughout the comment period are reviewed and considered at this time, prior to action.
- **Public Hearings** – Harford Transit LINK may participate in public hearings during major updates to the County's Transportation Plan or when undergoing the process for issuing an Environmental Impact Statement (EIS).

**Procedures for notifying the public of Title VI rights and how to file a complaint**
Harford Transit LINK includes the following language (or reasonably similar, explicit or abbreviated language) on printed information materials, on the agency's website, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Harford Transit LINK is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Harford Transit LINK's nondiscrimination policies and procedures, please visit the website at http://www.harfordcountymd.gov/services/transportation or

humanrelations@harfordcountymd.gov and/or contact Susan Fisher, Manager, Office of Human Relations, 410-638-4739, 125 N. Main Street, Bel Air, MD 21014.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service. To obtain a copy of the complaint form, go to http://www.harfordcountymd.gov/DocumentCenter/View/950 See Appendix E for Policy Statement, Appendix F for Sign Posted in the buses and Appendix G for the Complaint Form. Other relevant information about Title VI is also included within Harford Transit LINK's Policy Manual, Ride Guide brochure and schedules.

# Appendix E

## Harford County Current Translation Services and LEP Practices:

BARRY GLASSMAN
HARFORD COUNTY EXECUTIVE

BILLY BONIFACE
DIRECTOR OF ADMINISTRATION

AMBER C. SHRODES
DIRECTOR OF COMMUNITY SERVICES

**Harford County's Language Translation Services for Individuals with Limited English Proficiency (LEP)**

Harford County Government provides the following Language Translation Services to individuals with Limited English Proficiency (LEP): *Telephonic*, *Walk-In*, and *Written Document*. To access these services, please follow the instructions below. In the event that you need assistance, please contact the Disabilities Coordinator:

*Rachel Harbin*
*125 N Main Street, Bel Air, MD 21014*
*410-638-3373, raharbin@harfordcountymd.gov*

**Telephonic: Placing or Receiving a Call Requiring Translation Services**

1. Try to determine the language of the caller and ask them to wait while you get assistance. (If you cannot, the Language Line operator will help you.)

2. **Call Language Line services at 1-866-874-3972.** You will hear an automated message and be asked to enter the six digit Client ID **530405**, your department/agency, and the language the individual is speaking. Three way calls may be arranged by telling the Language Line operator the name and telephone number of the third party. You may also arrange a conference call by consulting the telephone user guide for your phone system. For assistance in making a conference call, contact your telecommunications representative. For Customer Service, please call 1-800-752-6096.

3. Remember that over-the-phone interpretation is "consecutive" interpretation. This means that there are pauses while the interpreter repeats each statement in the respective language.

4. Begin speaking to the caller, using the first person, ("How can I help you?"). The translator will translate your exact words and the individual's response.

5. All invoices will be sent to the Disabilities Coordinator:
*Rachel Harbin*
*125 N. Main Street, Bel Air, MD 21014*
*410-638-3373, raharbin@harfordcountymd.gov*

BARRY GLASSMAN
HARFORD COUNTY EXECUTIVE

BILLY BONIFACE
DIRECTOR OF ADMINISTRATION

AMBER C. SHRODES
DIRECTOR OF COMMUNITY SERVICES

**In–Person: For In-Person Appointments or Walk-In Translation Services**

1. Try to find out what language the individual is speaking. See the "Point to Your Language" cards. If you cannot identify the language, the Language Line operator will help you. If you need more copies of the "Point to Your Language" cards, please send your request to the Disabilities Coordinator, Rachel Harbin (raharbin@harfordcountymd.gov).

2. **Call Language Line Services at 1-866-874-3972**. You will hear an automated message and be asked to enter the six digit Client ID **530405**, your department/agency, and the language the individual is speaking. For Customer Service, please call 1 -800-752-6096

3. When the translator is on the line, put the phone on "speaker".

4. Speak directly to the individual, using the 1st person, ("How can I help you?"). The translator will translate your exact words and the individual's response.

5. All invoices will be sent to the Disabilities Coordinator:
   *Rachel Harbin*
   *125 N Main Street, Bel Air, MD 21014*
   *410-638-3373, raharbin@harfordcountymd.gov*

**Written Document: Language Translation for Documents**

1. **Send an electronic copy (preferred)** or a paper copy of the document to the Disabilities Coordinator. Include the **language of the original document and the desired language.**
   *Rachel Harbin*
   *125 N Main Street, Bel Air, MD 21014*
   *410-638-3373, raharbin@harfordcountymd.gov*

2. The Disabilities Coordinator will send the original document to Schreiber Translations, Inc for translation and then forward the translated document once it is received.

3. Please keep in mind that turn-around time for document translation is normally at least 5 business days.

## Point Card

| | |
|---|---|
| Spanish | Español |
| Cantonese | 廣東話 |
| Vietnamese | Tiếng Việt |
| Punjabi | ਪੰਜਾਬੀ |
| Korean | 한국어 |
| Cambodian | ខ្មែរ |
| Thai | ภาษาไทย |
| Mandarin | 國語 |
| French | français |
| Hindi | हिन्दी |
| Russian | Русский |
| German | Deutsch |
| Portuguese | Português |
| Brazilian Portuguese | Português do Brasil |
| Bosnian/Serbo-Croation | Srpski |
| Hmong | Hmoob |
| Japanese | 日本語 |
| Ukranian | Українська |
| Lao | ພາສາລາວ |
| Haitian Creole | Kreyòl Ayisyen |

**language**

*We speak your customer's language™*

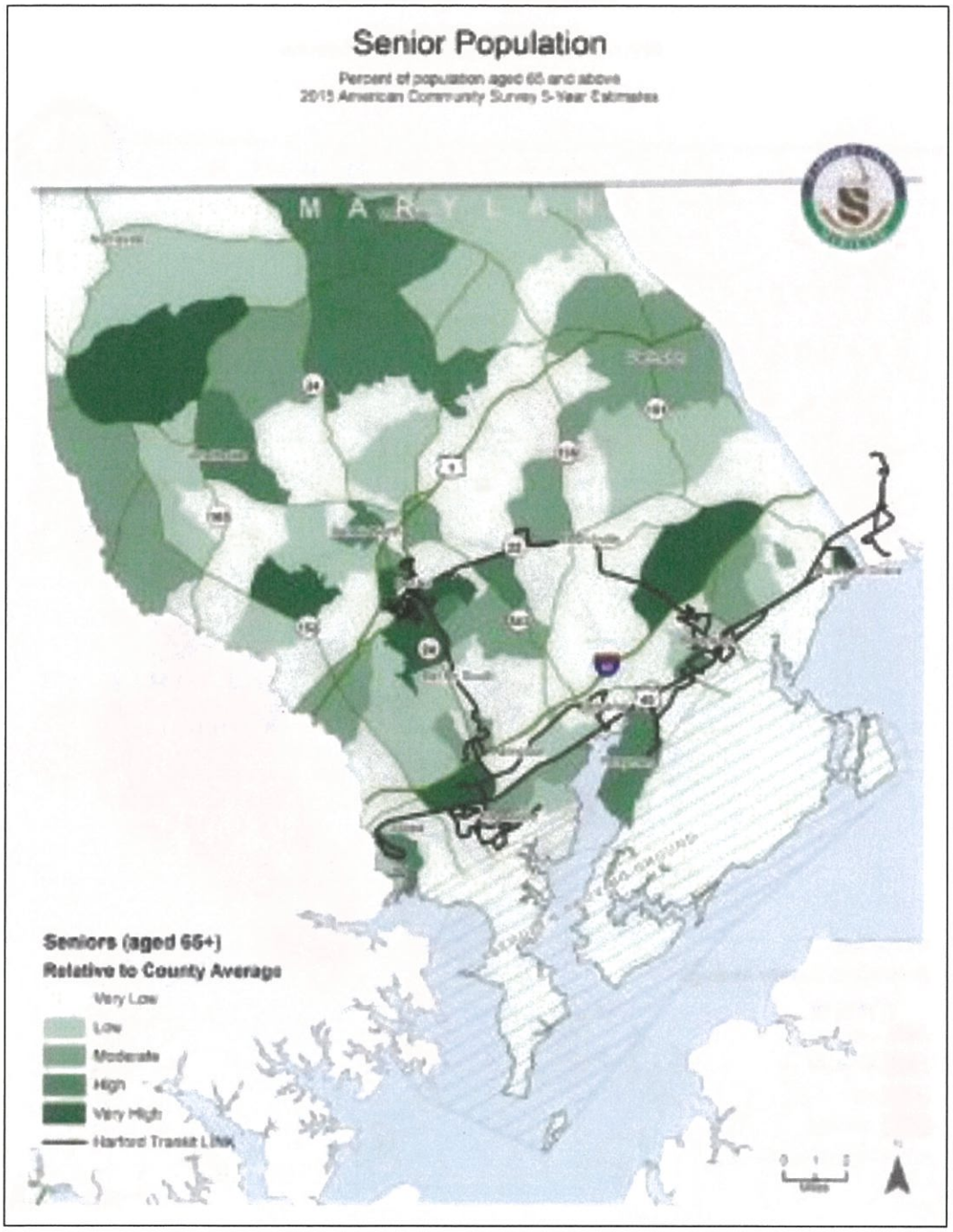
**Table F**

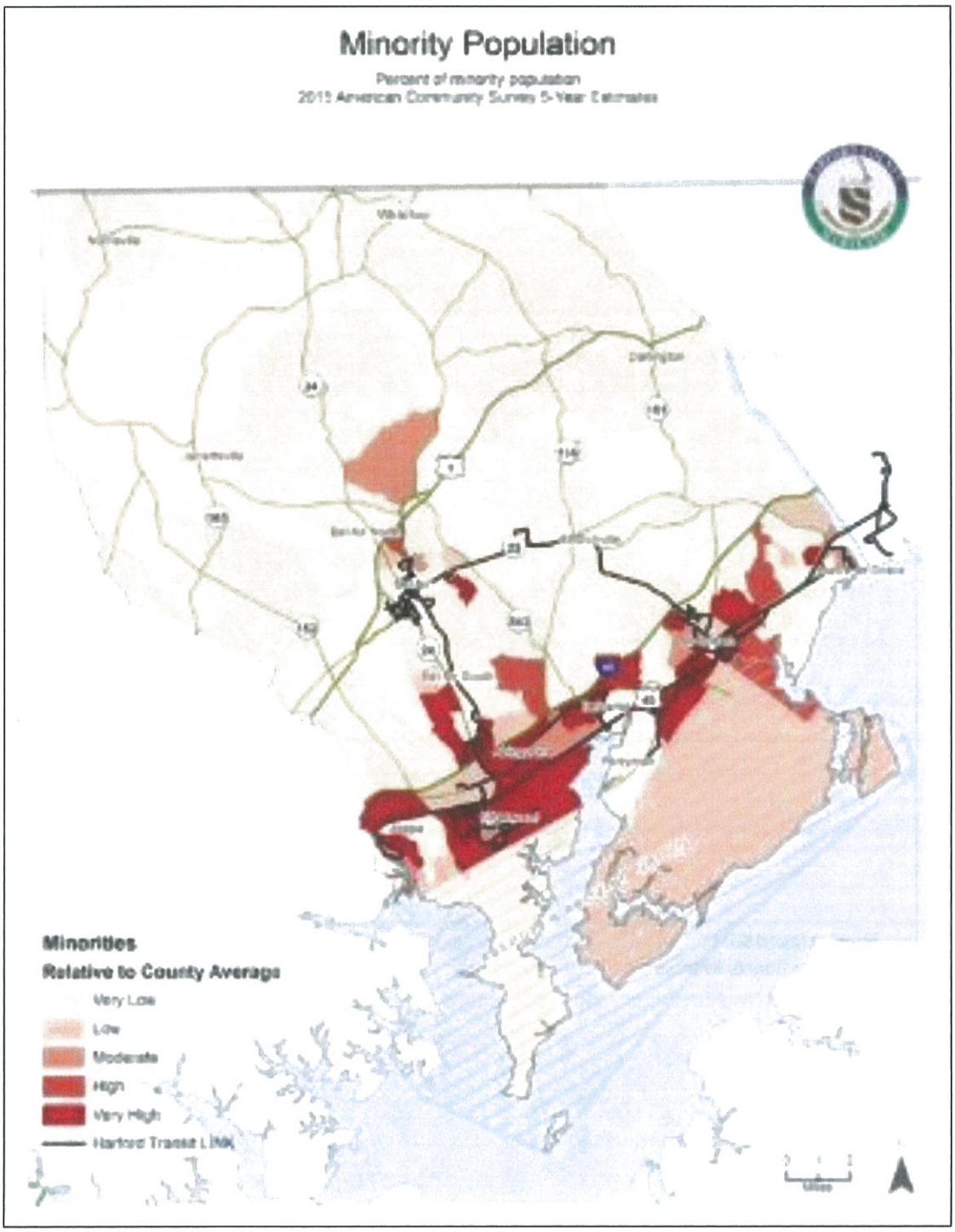
Minority Representation on Committees by Race

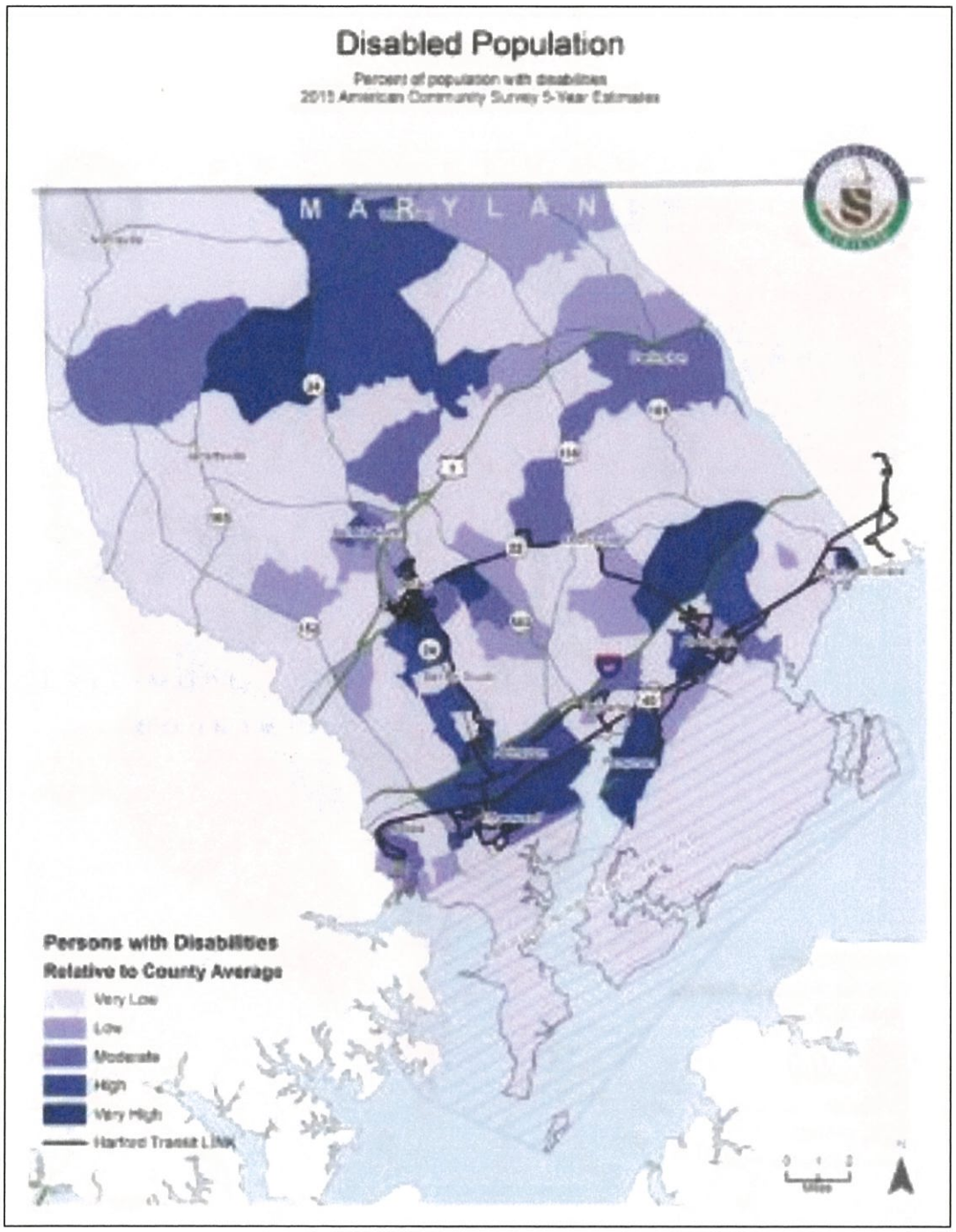
As mentioned in the above text, Harford Transit LINK does not have transit-related, planning boards, advisory councils or committees, or similar committees. Our policies (advisory bodies) are driven by Harford County's elected officials.

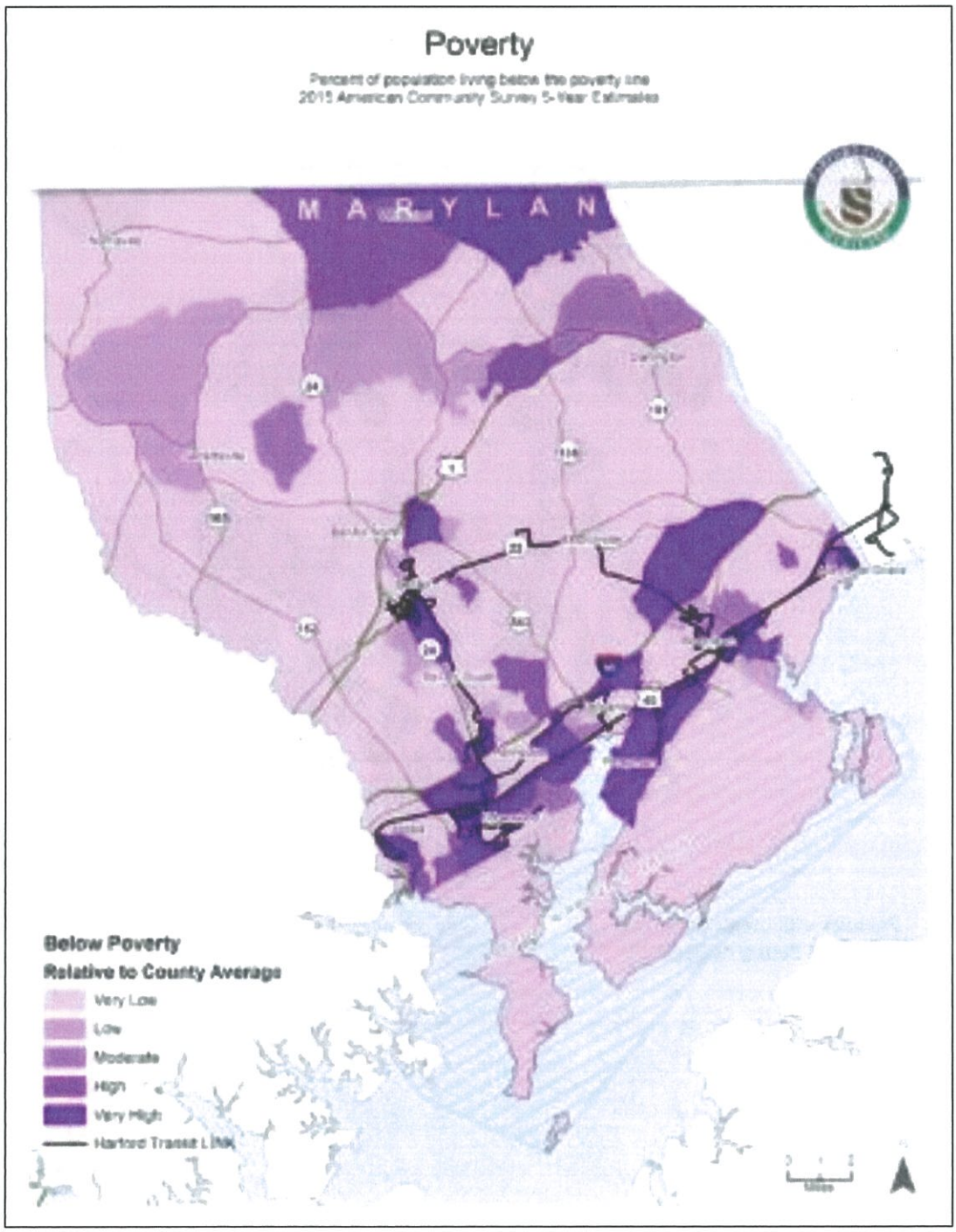
# APPENDEX G

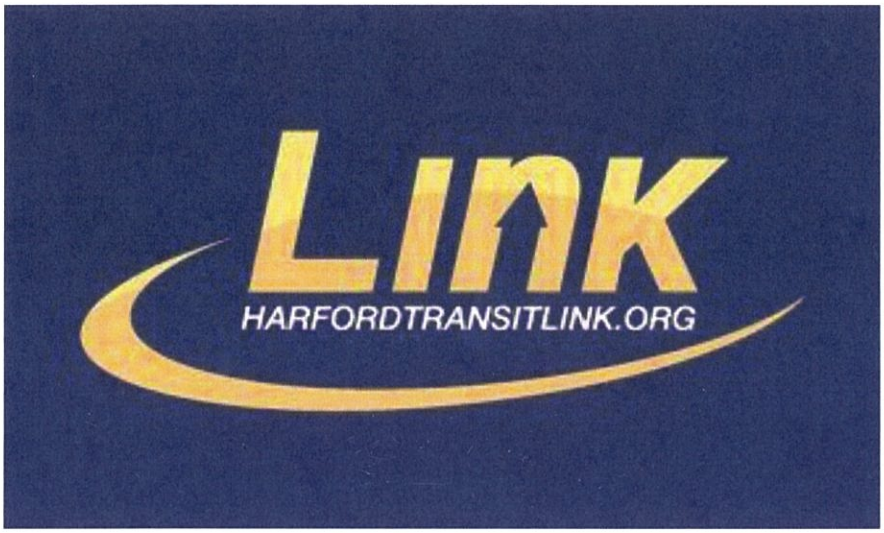
# POPULATION, DEMOGRAPHIC AND ROUTE MAPS


Senior Population
Percent of population aged 65 and above
2015 American Community Survey 5-Year Estimates
Seniors (aged 65+)
Relative to County Average
Very Low
Low
Moderate
High
Very High
Hartford Transit LINK


Minority Population
Percent of minority population
2015 American Community Survey 5-Year Estimates
Minorities
Relative to County Average
Very Low
Low
Moderate
High
Very High
Hartford Transit LINK


Disabled Population
Percent of population with disabilities
2013 American Community Survey 5-Year Estimates
M A R Y L A N
Persons with Disabilities
Relative to County Average
Very Low
Low
Moderate
High
Very High
Harford Transit LINK


Poverty
Percent of population living below the poverty line
2015 American Community Survey 5-Year Estimates
MARYLAN
Below Poverty
Relative to County Average
Very Low
Low
Moderate
High
Very High
Hartford Transit Link


Link
HARFORDTRANSITLINK.ORG