



# Harford Transit LINK FY 2021-2023

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

Adopted October 1, 2009  
(Revised June 28, 2018)  
(Revised September 24, 2020)

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## **I. INTRODUCTION**

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 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 program 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 environmental justice in the transportation planning and programming, and providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory 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 seven routes (with twelve vehicles) on weekdays which includes 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 seven 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 (PL 100.259), 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 Transit LINK's 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

9/25/2020  
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, or sex, 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); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); 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. 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).

## **Annual Nondiscrimination Assurance to MTA**

As part of the Certifications and Assurances submitted each year to the MDOT MTA with the Annual Transportation Plan (ATP, the public transportation grant application) and all Federal Transit Administration grants submitted to the MDOT MTA, Harford Transit LINK submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

The assurance for FYs 2021 is attached as Appendix A. In signing and submitting this assurance, Harford County Maryland (Harford Transit LINK) confirms to MDOT MTA the agency's commitment to nondiscrimination and compliance with federal and state requirements.

## **IV. ORGANIZATION**

Under the authority of the Harford County, Maryland, and the Harford County Executive, the Harford County Department of Community Services' Human Relations Manager is responsible for ensuring implementation of the agency'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.

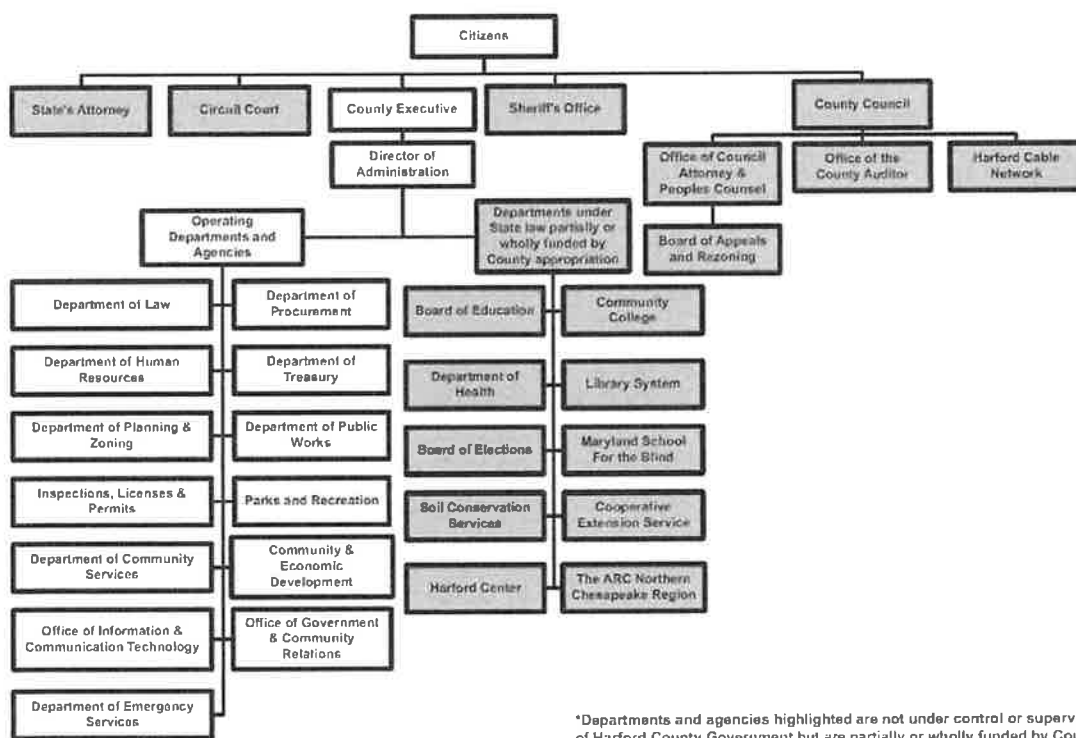
### **Title VI Manager Responsibilities**

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.

## Harford County Government Organization Chart



*Note that Grantees that provide service to geographic areas with a population of 200,000 or greater (under 49 U.S.C. 5307) have additional program-specific requirements which are included in this model.*

- The Title VI Manager, **Natasha Jackson** is/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, and internal education. Those responsible for overall administration coordinate with those responsible for public outreach and involvement and service planning and delivery.
- **Natasha Jackson** is/are responsible for public outreach and involvement. This includes development and implementation of the Limited English Proficiency (LEP) plan. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.
- **The Harford Transit LINK Administrator and leadership staff** are responsible for service planning and delivery. This includes analysis of current services, analysis of proposed service and fare changes, and environmental justice. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.

*[If these individuals also have responsibilities under Equal Employment Opportunity (EEO), Disadvantaged Business Enterprise (DBE), and Americans with Disabilities Act (ADA) compliance, mention these responsibilities and their relationship to Title VI implementation.]*

## **V. OVERALL TITLE VI PROGRAM RESPONSIBILITIES**

Following are 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 providing service in a small urban area, **Harford Transit LINK** is required to notify MDOT MTA immediately when a Title VI complaint has been received. Harford Transit LINK is also required to submit a report that documents any Title VI complaints on a quarterly basis as part of their quarterly Request for Reimbursement and an annual report to the MDOT MTA that documents any Title VI complaints received during the preceding 12 months, as well as a summary of the public



outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

The reporting form for the FY 2021 ATP is attached as Appendix B

Further, Harford Transit LINK submits to MDOT MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date.

- A copy of any compliance review report for reviews conducted in the last three (3) 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
- Harford Transit LINK's procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the Harford Transit LINK's since the last submission
- A copy of Harford Transit LINK's agency's 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 MDOT 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 Administrator will review the agency's Title VI program to assure implementation of the Title VI plan. Additionally, they will 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, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

### **5. Resolution of complaints**

Any individual may exercise his or her right to file a complaint with Harford Transit LINK if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Harford Transit LINK will report the complaint to MDOT MTA within three (3) business days (per MDOT MTA requirements), and make a concerted effort to resolve complaints locally, using the Harford Transit LINK's Nondiscrimination Complaint Procedures, as described in

Appendix C. All Title VI complaints and their resolution will be logged as described under “Data collection” and reported annually (in addition to immediately) to MDOT MTA.

## **6. Written policies and procedures**

Harford Transit LINK’s Title VI policies and procedures are documented in this plan and its appendices and attachments. This Plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of item 3 above (annual Title VI review), 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, upon promotion and on an annual basis. This training will include requirements of Title VI, Harford Transit LINK’s obligations under Title VI (LEP requirement included), required data that must be gathered and maintained and how it relates to the Annual Report and Update to MDOT MTA, and any findings and recommendations from the last MDOT MTA compliance review.

In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint (which may be for a specific individual or for the Harford Transit LINK in its entirety, depending on the complaint).

Title VI training is the responsibility of the Manager of the Office of Human Relations, Mediation, and Volunteerism.

## **8. Title VI clauses in contracts**

In all procurements using a Purchase Order (PO) and/or requiring a written contract, Harford Transit LINK’s contract will include the non-discrimination clauses attached as Appendix C. The Title VI Manager will work with the Administrator of Harford Transit LINK and the procurement officers for Harford County to ensure appropriate non-discrimination 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, or 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.

### **Responsibilities of the Title VI Manager**

The Title VI Manager is responsible for supervising the [*other staff assigned with Title VI responsibilities*] in implementing, monitoring, and reporting on Harford Transit LINK's compliance with Title VI regulations. In support of this, the Title VI Manager will:

- Identify, investigate, and eliminate discrimination when found to exist.
- Process Title VI complaints received by Harford County Maryland and Harford Transit LINK, in accordance with the agency's Nondiscrimination Complaint Procedures (attached as Appendix C).

- Meet with the [*other staff assigned with Title VI responsibilities, including public outreach & involvement and service planning and delivery*] periodically to monitor and discuss progress, implementation, and compliance issues.
- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with [*other staff assigned with Title VI responsibilities, including public outreach & involvement and service planning and delivery*] to develop and submit the Annual Title VI Report and Update submitted to the MDOT MTA as part of the ATP to the MDOT MTA.
- Review the Annual Title VI Report and Update to determine the effectiveness of the Title VI program and related efforts.
- Review contract documents to ensure Title VI assurance language is included.
- If Harford Transit LINK receives a Title VI complaint about a contractor, work with the appropriate contract oversight staff and contractor to resolve the complaint and write a remedial action if necessary.
- Review important Title VI related issues with the \_\_ [*Authorizing Official of Grantee*] \_\_, as needed.
- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed according to the agency's LEP plan and federal and State laws/regulations.

## **VI. PUBLIC OUTREACH AND INVOLVEMENT**

Public outreach and involvement applies to and affects Harford Transit LINK's mission and work program as a whole, particularly agency 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 minority and low-income communities, and organizations representing these and other 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.

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

**Harford Transit LINK** includes the following language on all printed information materials, 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:

The 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.

Title VI of the Civil Rights Act requires 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 otherwise be subjected to discrimination under any program or activity of the Harford Transit LINK.

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, and are also included within Harford County Maryland, Harford Transit LINK's passenger policies, Ride Guide and brochures.

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, then you have the right to file a complaint.

Complaints may be filed within one-hundred-eighty 180 days following the date of the alleged discriminatory action. Complaints may be submitted by mail, telephone, or email.

If you have any questions, concerns, complaints or would like additional information regarding Title VI, please contact the Harford County Office of Human Relations, Mediation, and Volunteerism.

Natasha J. Jackson, Manager  
Office of Human Relations, Mediation, and Volunteerism  
125 North Main Street  
Bel Air, MD 21014  
410-638-4739  
Human Relations, [humanrelations@harfordcountymd.gov](mailto:humanrelations@harfordcountymd.gov)  
410-638-4807, Mediation, [mediation@harfordcountymd.gov](mailto:mediation@harfordcountymd.gov)

### **Procedures for handling and recording Title VI investigations/complaints/lawsuits**

Procedures for handling and recording Title VI complaints are attached as Appendix D.

Should any Title VI investigations be initiated by FTA or MDOT MTA, or any Title VI lawsuits be filed against Harford Transit LINK, the agency will follow these procedures:

***[Insert your procedures for handling and recording Title VI investigations, complaints, and lawsuits. At a minimum, they should include notifying your MDOT MTA Regional Planner and the Office of Equal Opportunity Compliance Program (OECOP) immediately, and maintaining a status log and paper file.]***

## **Harford County Office of Human Relations**

### **Complaint Processing Procedure**

#### **I. Legal Authority:**

Harford County Code Article XXXIII (Executive Order No. 83-2), Office of Human Relations

Harford County Code Chapter 95 (as amended), Discriminatory Practices

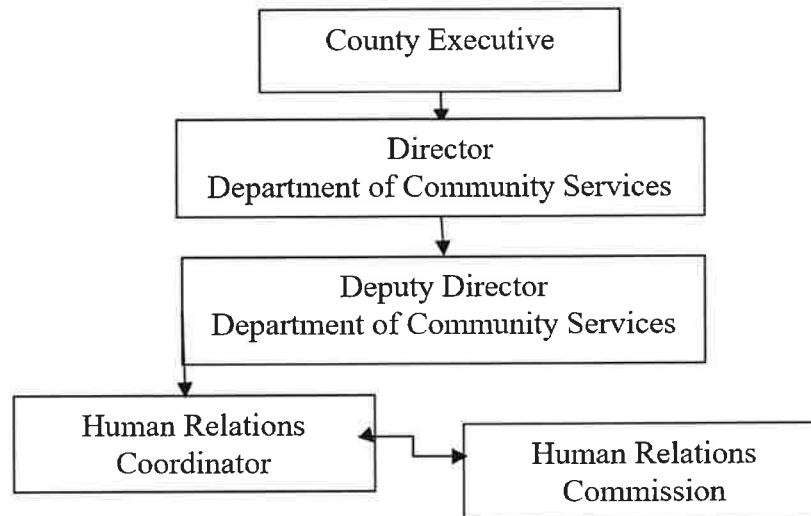
#### **II. Description of Organization**

- A. The Office of Human Relations (the Office) currently consists of one (1) full time staff member, the Human Relations Coordinator (Coordinator).
- B. The Office of Human Relations was established as a separate agency of the Executive Branch of the County Government (Article XXXIII, Executive Order 83-2), subject to the direction, supervision and control of the County Executive. The Office is housed within the Department of Community Services and administered by the Coordinator.

The Office plans, coordinates, develops and directs the activities of the Human Relations Commission; acts as liaison between County Government and the local community on controversial human relations problems; reports controversial human relations matters to the Human Relations Commission and prepares recommendations; speaks before business, community and civic groups concerning the activities, goals and programs of the Commission; performs general administrative duties.

- C. The Human Relations Commission is an advisory board formed under the County Charter Section 411, County Code Article XVI (Human Relations Commission, of Part 2, Nonbinding Advisory Boards, of Chapter 9, Boards, Commissions, Councils and Agencies) to study the nature and causes of social friction in the community and to make recommendations to the County Executive and County Council with a view toward alleviating social problems and promoting equality, understanding and harmonious relations among the citizens of the County.

#### D. Organizational Chart



### III. Relationship with Equal Employment Opportunity Commission (EEOC), Maryland Commission on Civil Rights and other local commissions:

While the Harford County Office of Human Relations has no formal memorandum of understanding or agreement with any other human rights agency, complaints are routinely referred to the appropriate federal, state or local agency when the allegations made are beyond the authority of the Office of Human Relations and/or when the Respondent is located outside Harford County's jurisdictional boundaries.

- A. *Referral of fair housing complaints to HUD* – Fair housing complaints originating with the Office of Human Relations are screened to ensure jurisdiction. Complainants are informed of their right to pursue their complaints through the courts and/or federal and/or state agencies. Should the complainant elect to have his/her complaint processed by HUD or if the concerns fall outside of the authority of the Office, the complainant is referred to the Office of Fair Housing and Equal Opportunity, United States Department of Housing and Urban Development, The Wanamaker Building, 100 Penn Square East, Philadelphia, PA 19107-3380, 215-861-7646, 1-888-799-2085, [www.hud.gov](http://www.hud.gov).
- B. *Referral of fair housing complaints to Maryland Commission on Civil Rights* - Fair housing complaints originating with the Office of Human Relations are screened to ensure jurisdiction. Complainants are informed of their right to pursue their complaints through the courts and/or federal and/or state agencies. Should the complainant elect to have his/her complaint processed by Maryland Commission on Civil Rights or the concerns fall outside of the authority of the



Office, the complainant is referred to the Maryland Commission on Civil Rights, 6 Saint Paul Street, Suite 2204, Baltimore, MD 21202, 410/767-8600.

C. *Referral of employment complaints to Equal Employment Opportunity Commission* – Employment complaints originating with the Office of Human Relations are screened to ensure jurisdiction. Complainants are informed of their right to pursue their complaints through the courts and/or federal and/or state agencies. Should the complainant elect to have his/her complaint processed by EEOC, the complainant is referred to the Baltimore Field Office, City Crescent Building, 10 South Howard Street, 3<sup>rd</sup> Floor, Baltimore, MD 21202, 410-/962-4270 or 1-800-669-4000.

D. *Referral of employment complaints to Maryland Commission on Civil Rights* — Employment complaints originating with the Office of Human Relations are screened to ensure jurisdiction. Complainants are informed of their right to pursue their complaints through the courts and/or federal and/or state agencies. Should the complainant elect to have his/her complaint processed by Maryland Commission on Civil Rights or the concerns fall outside of the authority of the Office, the complainant is referred to the Maryland Commission on Civil Rights, 6 Saint Paul Street, Suite 2204, Baltimore, MD 21202, 410/767-8600.

#### **IV. Relationship with the Harford County Housing Agency**

The Office of Human Relations and Harford County Housing Agency are committed to ensuring that all Harford County residents are protected from unlawful, discriminatory practices in housing. To that end, these organizations have voluntarily entered into a Memorandum of Understanding to document their cooperative working relationship. Complaints originating at the Harford County Housing Agency are screened for validity under the Fair Housing Laws. Complainants are informed of their right to pursue their complaints through the courts and/or federal and/or state agencies. Should the complainant elect to have his/her complaint processed locally, the complaint is referred to the Office of Human Relations for processing. Complaint forms developed by the Office of Human Relations are available online, [Harfordcountymd.gov/FormCenter/Community-Services-7/Harford-County-Human-Relations-Complaint-298](http://Harfordcountymd.gov/FormCenter/Community-Services-7/Harford-County-Human-Relations-Complaint-298) and may be provided to the Housing Agency for distribution to clients, as needed.

When a complaint originates at the Housing Agency and the complainant prefers to have the complaint processed by the United States Department of Housing and Urban

Development (HUD), the Housing Agency will refer the matter directly to HUD while sending a copy to the Office of Human Relations for statistical purposes only.

#### **V. Complaint Processing Procedure**

##### **A. Protected Classes**

1. Race
2. Creed
3. Color
4. Sex
5. National Origin
6. Ancestry
7. Age
8. Occupation – The principal lawful activity of one’s life. Persons included in this definition are students, welfare recipients, retired persons and all other persons, irrespective of income, who are denied equal protection of the law.
9. Marital Status
10. Political Opinion – The opinion of persons relating to government or to the conduct of government, or related to political parties authorized to participate in primary elections in the State of Maryland.
11. Personal Appearance – The outward appearance of any person, irrespective of sex with regard to hairstyle, beards, or manner of dress. Such term shall not relate to the requirement of cleanliness, uniforms or prescribed attire when uniformly applied for admittance to a public accommodation or a class of employees for a customary or reasonable business.
12. Disability (mental or physical)
13. Familial Status – One or more individuals, who have not attained the age of 18 years, being domiciled with:
  - a. A parent or another person having legal custody of such individual or individuals; or
  - b. The designee of such parent or other person having custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

## **B. Definitions**

1. Discrimination – Acting or failing to act or unduly delaying an action regarding any person because of race, creed, color, sex, national origin, age (except as required by state or federal law), occupation, marital status, political opinion, personal appearance, physical or mental handicap, familial status in a way that adversely affects or interferes with such person’s civil and constitutional rights, equal and fair treatment, or due process in the areas of housing, employment, administration of justice, county services, education, public accommodations, or other such related areas.
2. Dwelling – Any building or structure, or portion thereof, which is designed, intended or arranged for use or occupancy as a home, residence or sleeping place for one (1) or more individuals.

3. Employer – Any person engaged in commerce, industry, agriculture or a lawful profession who for compensation has hired or contracted for the services of five (5) or more employees for a total of twenty (20) or more hours in the current or preceding calendar year, or any agent of such person.
4. Housing – Any dwelling for the use of one (1) or more individuals, groups or families, any mobile home site, and any land offered for sale or lease for the construction of such dwelling, building, structure, or mobile home site.
5. Lending Institution – Any bank, insurance company, savings and loan association, or any other organization or person regularly engaged in the business of lending money or guaranteeing loans within Harford County.
6. Place of Public Accommodation – Any retail store, inn, hotel, motel, or other establishment which provides lodging to transient persons or any restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility at which food or alcoholic beverages are sold for consumption on the premises or any gasoline station, motion-picture house, theater, concert hall, sports arena, stadium, or place of exhibition or entertainment. Such term shall also include any athletic or recreation facility or any barbershop, beauty salon, health spa or other facility or any medical and health service individual, business or facility which maintains a building or office for providing related services.
7. Respondent – The individual(s), organization, institution, company, etc., against whom the Complainant has filed. **NOTE:** The Respondent must be located in Harford County and must NOT be a federal and/or state agency.

**B. Statute of Limitations**

Individuals have six (6) months from the occurrence or the discovery of the discriminatory practice within which to file a complaint. Complaints may be reasonably amended at any time after being filed.

**C. Inappropriate Referrals:**

Inappropriate referrals hinder the processing of valid complaints. The following examples of potential grievances are not within the jurisdiction of the Office of Human Relations, unless they are based on some form of illegal discrimination as defined above.

1. Housing – Tenant/landlord disputes pertaining to the lease agreement; landlords have the right to rent to whomever they wish and to set the terms of tenancy within legal guidelines.
2. Employment – Employers may hire and fire at will for any reason other than illegal discrimination. Such matters are generally handled through unions, employee associations, or internal grievance procedures.
3. Public Accommodations – Establishments are permitted to have a dress code, so long as it is consistently applied. They also have the right to refuse service at their discretion, so long as such refusal is not based on illegal discrimination.
4. Administration of Justice – Alleged police brutality or harassment. (These matters are handled through the law enforcement agencies).

5. Credit – Lending institutions have the right to deny credit within legal guidelines where risk is apparent.

These examples are not all inclusive but give a general idea of what constitutes an inappropriate referral.

#### D. **Receipt of Complaint**

Any person claiming to be aggrieved by an alleged violation of Chapter 95 of the Harford County Code may proceed directly with civil or criminal enforcement as provided by the Chapter or the person may file a complaint with the Office of Human Relations.

In the event, a Harford County employee files a complaint with the Office of Human Relations alleging that the County unlawfully discriminated against him/her in the performance of the employee's duties, the complaining party will be promptly referred to the Harford County Department of Human Resources; if the complaint is in writing, the correspondence will be forwarded to that Department for processing. The complaining party will be notified that such matters are not handled by the Office of Human Relations but by the Department of Human Resources.

The initial contact with a complaining party is generally by telephone – usually, the complaining party calls the Office of Human Relations and speaks with the Coordinator. The party is interviewed briefly by the Coordinator to establish the area for concern. Complainants whose concerns fall outside of the authority of the Office of Human Relations are referred to the appropriate agency for assistance. When a complaint appears to fall within the purview of the Office, the complaining party is invited to complete and submit a written complaint form. In accordance with the County Code, the complaint must state the name and address of the complainant and the respondent and such other information as may be required from time to time by the Coordinator.

A letter acknowledging receipt of the complaint is prepared and issued to the Complainant. The letter includes information about the Complainant's right to file with the courts or other agencies, possible pre-investigation/finding mediation, and notice that a copy of the complaint will be provided to the Respondent for reply. While the County Code requires that a copy of the complaint be provided to the Respondent, the Complainant's contact information is deleted before the copy is forwarded. The Complainant is also informed that the County Code prohibits the Respondent from retaliating against him/her for filing a complaint of this nature. Lastly, the Complainant is given a general overview of the investigative process.

E. **Notice to Respondent**

A copy of the complaint and any amendments thereto shall be served on the Respondent by certified mail within ten (10) days after it is filed or amended. Enclosed with the complaint is a letter asking the Respondent to complete and submit a Respondent Position Statement within thirty (30) days of his receipt of the packet. The Respondent is alerted that the County Code prohibits retaliation against a person for filing a complaint of this nature. The Respondent is informed of the opportunity for pre-investigation/finding mediation and given a general overview of the investigative process.

F. **Witnesses**

Both the Complainant and Respondent are invited to identify any witnesses who may have information that will help in determining what happened in the matter. They are asked to provide contact information for their witnesses who will be contacted by the Coordinator for their testimony. Witnesses are reminded to be truthful in their comments; they are informed of the County Code provisions prohibiting retaliation against them for participating in the investigative process. Confidentiality is maintained throughout the investigative process.

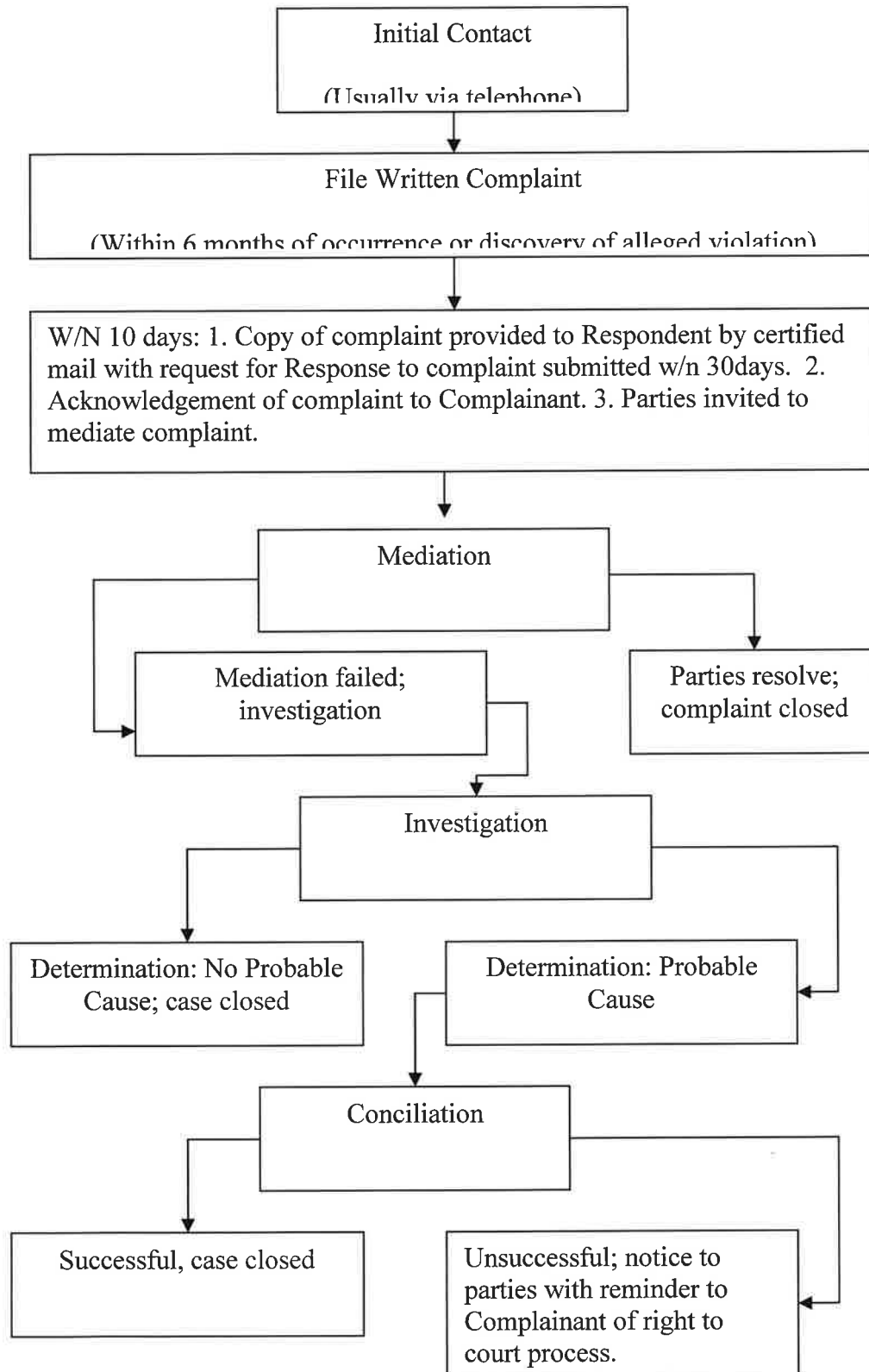
G. **Investigative Report/Findings**

The results of the investigation shall be made as written findings and copies of the findings shall be furnished to the parties.

If the findings are there is reasonable cause to believe that a violation of Chapter 95 has occurred, the Coordinator shall immediately, but not later than 30 days after the date of such findings, attempt to eliminate the violation by conference, conciliation and persuasion. If an agreement is reached for the elimination of the violation, it shall be reduced to a legally enforceable written instrument. If the Coordinator is unable to reach an agreement, the Coordinator shall so certify in writing that conciliation has failed and provide notice of such certification to all parties.

If there is a finding that there is a possible violation of the Code and conciliation has failed, the Coordinator shall so inform the parties and remind complainant of his/her right to court process.

If the findings are that there is no reasonable cause to believe that a violation of the law occurred, the Coordinator shall transmit the findings to the parties no later than ten (10) days after the date of such findings.



## Strategies for Informing and Engaging Individuals with Limited English Proficiency (LEP)

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 (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. 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. This includes providing meaningful access to individuals who are limited in their use of English.

As required by MTA, Harford Transit LINK developed a written LEP Plan, included as Appendix E.

Using 2010 Census data, Harford Transit LINK will evaluate data to determine the extent of need for translation services of its vital documents and materials.

### Public Outreach and Involvement Activities

Harford Transit LINK takes the following steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities, including those conducted as part of the planning process for proposed changes in services, fares, and facilities development.

- Publishing public notices within local newspapers of general circulation as well as those targeted as minority and LEP persons and on the agency's website.

Public notices are issued to:

- announce opportunity to participate or provide input in planning for service changes, fare changes, new services, and new or improved facilities (early in the process)
  - announce the formal comment period on proposed major service reductions and fare increases with instructions for submitting comments including a public hearing (or opportunity for a public hearing with instructions for requesting a hearing if this is the LOTS' local policy) (at the end of the planning process) **[required]**
  - announce impending service and fare changes (after plan has been finalized) **[required]**
  - announce intent to apply for public transit funding from MDOT MTA, and to announce the formal comment period on the proposed program of projects, with a public hearing (or opportunity for one) (annually in advance of submitting the ATP) **[required]**
- Posting public notices as described above at major passenger/public facilities and in all vehicles.

- Sending news releases to news media (newspapers, radio, television, web media) of general interest as well as those targeted at minority and LEP persons, as well as community-based organizations that serve persons protected under Title VI and which publish newsletters. Under County policy, press releases are distributed by the department of Governmental & Community Relations
- Sending public service announcements (PSAs) to news media of general interest as well as those targeted at minority and LEP persons, as well as community-based organizations that serve persons protected under Title VI and which publish newsletters. Under County policy, press releases are distributed by the department of Governmental & Community Relations
- Conducting in-person outreach upon request at public meetings, community-based organizations, human service organizations which assist low income and LEP persons, places of worship, service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI. The availability of Harford Transit LINK staff for such speaking engagements is posted on the agency's website. On person outreach is handled by individual request and is attended by Administrator, Deputy Director, and /or Director of the department.
- Conducting public hearings at locations and meeting times that are accessible by public transit.
- Conducting periodic is completed annual with the Dump the Pump event and the resumption of Harford Community College classes, customer satisfaction surveys which are distributed to passengers on vehicles.

The above activities are the responsibility of Harford County Maryland, Harford Transit LINK, Harford Commute Smart, and the Manager of Human Relations.

Harford Transit LINK will follow its adopted written policy (Appendix F) for the public comment process for major service reductions and fare increases.

### **Recordkeeping on Public Outreach and Involvement Activities**

To support the development of the Title VI Annual Report and update to the MDOT MTA, maintain the following records related to public outreach and involvement:

- Paper files with copies of materials published or distributed for each planning project and service/fare change, as well as all news releases, public service announcements, surveys, and written summaries of in-person outreach events.
- A log/database of public outreach and involvement activities, including dates, planning project or service/fare change supported (if applicable), type of activity, LEP assistance requested/provided, target audience, number of participants, and location of documentation within paper files.

Maintenance of these records is the responsibility of Harford Transit LINK.



## **VII. ENVIRONMENTAL JUSTICE (FOR ALL CONSTRUCTION PROJECTS)**

For new construction and major rehabilitation or renovation projects where National Environmental Policy Act (NEPA) documentation is required, Harford Transit LINK will integrate an environmental justice analysis into the NEPA documentation for submission to MDOT MTA. (Please seek guidance from MDOT MTA as to whether or not an Environmental analysis is required)

The environmental justice analysis includes:

- An identification of the low-income and minority communities within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, a public involvements process, etc.).
- For each of the identified low income or minority communities, a discussion of the adverse impacts of the project, both during and after its construction, such as:
  - Adverse effects on community cohesion or economic vitality by dividing or fracturing the community,
  - The isolation, exclusion, or separation of the community from the broader community,
  - Destruction or disruption of the availability of public and private facilities and services,
  - A change in employment opportunities,
  - Increased traffic in a residential area or decreased parking availability in a commercial area,
  - Air pollution, noise, vibration, change in storm water levels or flows, disturbance of contaminated soil or groundwater,
  - Disruption or destruction of man-made or natural resources such as parks, or Native American traditional cultural places,
  - Destruction or diminution of aesthetic or historic value, and
  - The cumulative effects of the above on the community.
- For each of the identified low income or minority communities, a discussion of all positive impacts such as an improvement in transit service, mobility, or accessibility.
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse impacts, including, but not limited to any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act, to address adverse community impacts such as separation or cohesion issues and the replacement of the community resource destroyed by the project.
- A discussion of the remaining impacts, if any, and why further mitigation is not proposed.
- A comparison of mitigation and environmental enhancement actions implemented in conjunction with the project and affecting predominantly low-income and minority neighborhoods with mitigation implemented in conjunction with similar construction, renovation, or rehabilitation projects located in predominantly non-minority or non-low-income neighborhoods, or with segments of a corridor project that transverse non-minority and non-low-income neighborhoods.

The development of environmental justice analyses is the responsibility of the Harford Transit LINK when required, a consultant will be secured to complete the process.

**All recipients providing service to geographic areas with 200,000 people or greater should submit the following information as part of their Title VI Program.**

**I. Checklist for recipients serving urbanized areas with populations of 200,000 people or greater**

<b>Provision</b>	<b>Circular Reference</b>	<b>Citation</b>	<b>Information to be included in the Title VI report</b>
Demographic Data Collection	Chapter V, Part 1	49 CFR 21.9(b);	Either demographic maps and charts prepared since the most recent decennial census, results of customer surveys that include demographic information, or demographic information on beneficiaries through locally developed procedure.
Service Standards	Chapter V, Part 2	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21	System-wide service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security).
Service Policies	Chapter V, Part 3	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21	System-wide policies (such as policies for vehicle assignment or transit security).
Equity Evaluation of Service and Fare Changes	Chapter V, Part 4	49 CFR 21.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21;	An analysis of the impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report was submitted.
Monitoring	Chapter V, Part 5	49 CFR 21.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21;	The results of either level of service monitoring, quality of service monitoring, analysis of customer surveys, or locally developed monitoring procedure.

## SERVICE DELIVERY AND PLANNING

NOTE: *not required for <200k population, but recommended*

As an MDOT MTA funding recipient in an area with population below 200,000, Harford Transit LINK is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population.

### Procedures for ensuring equity in service provision

**Vehicle Assignment:** Harford Transit LINK assigns vehicles with the goal of providing equitable benefits to minority and low income populations. Vehicles are assigned with regard to service type (fixed-route, demand-response, or a hybrid type) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities). For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle.

The Transit Supervisors, Lead Drivers, and Dispatcher review vehicle assignments on a monthly basis to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles. *NOTE: not required for <200k population, but recommended*

**Monitoring Title VI Complaints:** As part of the complaint handling procedure (Appendix D), 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 review examines span of service (days and hours), frequency, routing directness, and interconnectivity with other routes. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

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, this review is conducted as part of preparing the Quarterly and/or Annual Report and update for submission to the MDOT MTA.

### Procedures for Ensuring Equity in Planning Service and Fare Changes

With each planned 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 changes to existing services or fares, as well as new services, have a goal of providing equitable service.

**The following steps are taken with each planning effort and documented in writing:**

*NOTE: not required for <200k population, but recommended*

1. Describe proposed changes and the rationale behind them.

2. Provide a list of modes (such as fixed-route or demand-response) the service changes would impact.
3. Describe the impacts of service changes on low-income and/or minority communities. In particular, establish why the proposed service would not have a disproportionately high and adverse effect on low-income and/or minority populations. **Working with latest available Census data and population estimates at the Census Block Group level, determine where low income and minority populations comprise the highest number and percent of the population, and compare the location of these areas to the routes or service areas for which the changes are being considered.**
4. Describe transit alternatives available to riders impacted by proposed changes.
5. Identify measures, if any, that would be taken to avoid, minimize, or mitigate any adverse effects of the service, or enhancements or offsetting, if any, that would be implemented in conjunction with the service.
6. Describe how the agency intends to reach out and involve minority and low-income populations to make sure their viewpoints are considered.
7. Determine whether it is necessary to disseminate information that is accessible to LEP persons (following the agency's LEP plan). All main schedule and Ride Guides are translated, with language on how to request additional assistance.

Steps 1 through 5 are the responsibility of Harford Transit LINK and when required, a consultant will be secured to complete the process.

Steps 6 and 7 are the responsibility of the Harford Commute Smart representative. As described under "Public Outreach and Involvement."

This analysis is also conducted for service and fare changes planned for while updating the agency's five-year Transportation Development Plan.

## **APPENDICES**

I. APPENDIX A - FY'S 2021- AND 2022 ASSURANCES

RESOLUTION NO. 009-20

1 COUNTY COUNCIL  
2 OF  
3 HARFORD COUNTY, MARYLAND  
4 Resolution No. 009-20  
5 Legislative Session Day 20-007  
6 March 3, 2020  
7 Introduced by Council President Vincenti  
8 at the request of the County Executive  
9

10

11 A RESOLUTION authorizing the County Executive to file an application with the  
12 Maryland Transit Administration of the Maryland Department of Transportation for SSTAP  
13 (Statewide Special Transportation Assistance Program) and Section(s) 5303, 5304, 5305, 5307,  
14 5309, 5310, 5311, 5316, 5317, 5318 Formula and Discretionary Operating and Capital grant  
15 programs under the Federal Transit Act during the fiscal year, and for any funds which may be  
16 available under the Federal Transit Act during the fiscal year.

RESOLUTION NO. 009-20

**RESOLUTION NO. 009-20**

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

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

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

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


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


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

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

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

ATTEST:

  
Mylia Dixon  
Council Administrator

  
Patrick S. Vincenti  
President of the Council

  
Barry Glassman  
County Executive

## II. APPENDIX B – FY21 ATP – TITLE VI REPORTING FORM

### TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS LOG

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient 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: Sylvia Bryant

E-MAIL: swbryant@harfordcountymd.gov

CONTACT #: 410-638-4739

FISCAL YEAR FY 2020

REPORTING PERIOD (check appropriate box):

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

1. Were any investigations, lawsuits or complaints filed during this time period? No
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)
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 subrecipient in response to the investigation, lawsuit or complaint.



TITLE VI –  
INVESTIGATIONS, COMPLAINTS & LAWSUITS LOG – FY 2019



### **III. APPENDIX C – NON-DISCRIMINATION 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 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, 5<sup>th</sup> 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](mailto:humanrelations@harfordcountymd.gov) or contact Susan Fisher, Manager, Office of Human Relations, 125 N. Main Street, Bel Air, MD 21014, [sefisher@harfordcountymd.gov](mailto: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

## **IV. APPENDIX D – PROCEDURES FOR HANDLING TITLE VI COMPLAINTS**

### **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, Mediation, and Volunteerism).

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](mailto: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 policies 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.

## **V. APPENDIX E – LEP PLAN**

### **ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS**

#### **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](http://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 prevalent 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**

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

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:**

<u>Year</u>	<u>Amount</u>	<u>Primary Usage Details</u>
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 six fixed bus routes including the Cecil/Harford Connecting 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 assess 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](mailto: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.

## **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 six 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 9:000 p.m.

- Route 1: Green Line operated with three buses (Bel Air - Aberdeen - Havre de Grace)
- Route 2: Blue Line operated with four buses (Bel Air - Edgewood - Aberdeen)
- Route 3: Silver Line operated with two buses (Aberdeen - Edgewood - Joppatowne)
- Route 4: Yellow Line (Aberdeen Circulator)
- Route 5: Teal Line operated with two buses (Aberdeen - Havre de Grace - Perryville)
- Route 6: Orange Line (Bel Air Circulator)

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	60 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 $\frac{1}{4}$ to $\frac{1}{2}$ 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.

## **VI. APPENDIX F HARFORD TRANSIT LINK PUBLIC COMMENT PROCESS**

### **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](http://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](http://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](mailto:humanrelations@harfordcountymd.gov) and/or contact Natasha J. Jackson, Manager, Office of Human Relations, Mediation, and Volunteerism, 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.



## 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.**

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				



## VII. APPENDIX G

### 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](mailto: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.*

<input type="checkbox"/> Race	<input type="checkbox"/> Occupation
<input type="checkbox"/> Creed	<input type="checkbox"/> Marital Status
<input type="checkbox"/> Color	<input type="checkbox"/> Political Opinion
<input type="checkbox"/> Sex	<input type="checkbox"/> Personal Appearance
<input type="checkbox"/> Origin	<input type="checkbox"/> Mental Handicap
<input type="checkbox"/> Age	<input type="checkbox"/> Physical Handicap

#### Discriminatory or Wrongful Practice Involving:

*Check all that apply.*

<input type="checkbox"/> Administration of Justice	<input type="checkbox"/> Governmental Services
<input type="checkbox"/> Education	<input type="checkbox"/> Housing
<input type="checkbox"/> Employment	<input type="checkbox"/> Public Accommodations
<input type="checkbox"/> Other: <i>Please specify.</i>	

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

Date of Previous complaint: \_\_\_\_\_

How did you hear about the Office of Human Relations?

Date of Incident:

Time of Incident:

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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: \_\_\_\_\_

**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](mailto: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](mailto:raharbin@harfordcountymd.gov)

#### **MARYLAND'S NEW CENTER OF OPPORTUNITY**

410.638.3389 | 410.879.2000 | TTY Maryland Relay 711 | [www.harfordcountymd.gov](http://www.harfordcountymd.gov)

125 North Main Street, Bel Air, Maryland 21014

THIS DOCUMENT IS AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST

**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](mailto: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 1<sup>st</sup> 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](mailto: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](mailto: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.

*MARYLAND'S NEW CENTER OF OPPORTUNITY*

410.638.3389 | 410.879.2000 | TTY Maryland Relay 711 | [www.harfordcountymd.gov](http://www.harfordcountymd.gov)  
125 North Main Street, Bel Air, Maryland 21014

THIS DOCUMENT IS AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST

## Point Card

Spanish  
Cantonese  
Vietnamese  
Punjabi  
Korean  
Cambodian  
Thai  
Mandarin  
French  
Hindi  
Russian  
German  
Portuguese  
Brazilian Portuguese  
Bosnian/Serbo-Croatian  
Hmong  
Japanese  
Ukrainian  
Lao  
Haitian Creole

Español  
廣東話  
Tiếng Việt  
ਪੰਜਾਬੀ  
한국어  
ខ្មែរ  
ภาษาไทย  
國語  
français  
हिन्दी  
Русский  
Deutsch  
Português  
Português do Brasil  
Srpski  
Hmoob  
日本語  
Українська  
ພາສາລາວ  
Kreyòl Ayisyen

**language** •

*We speak your customer's language™*



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

**Harford Transit's Non-Discrimination Policy**



The Harford Transit 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.

Title VI of the Civil Rights Act requires 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 of the Harford Transit.

If you believe you have been subjected to unequal treatment because of race, color, or national origin, then you have the right to file a formal complaint.

Complaints may be filed within one-hundred-eighty (180) days following the date of the alleged discriminatory action. Complaints may be submitted by mail, telephone, or email.

If you have any questions, concerns, complaints or would like additional information regarding Title VI, please contact the Harford County Office of Human Relations & Mediation:

**Natasha J. Jackson, Manager**  
**Office of Human Relations & Mediation**  
**125 North Main Street**  
**Bel Air, MD 21014**  
**410-638-4739, Human Relations**  
**410-638-4807, Mediation**

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**SUS DERECHOS DE CONFORMIDAD CON EL TÍTULO VI  
DE LA LEY DE DERECHOS CIVILES DE 1964**

**Política de no discriminación de Harford Transit**

En Harford Transit estamos comprometidos a garantizar que no se excluya a ninguna persona de la participación en los servicios de tránsito que ofrecemos ni se le nieguen los beneficios de estos servicios, de conformidad con los requisitos del Título VI de la Ley de Derechos Civiles.

El Título VI de la Ley de Derechos Civiles establece que no se debe excluir a ninguna persona en los Estados Unidos de la participación en cualquier programa o actividad de Harford Transit ni se le pueden negar los beneficios de estos o de alguna otra forma sometería a discriminación con base en su raza, color u origen nacional.

Si usted cree que le dieron un trato injusto debido a su raza, color u origen nacional, tiene derecho a presentar una queja formal.

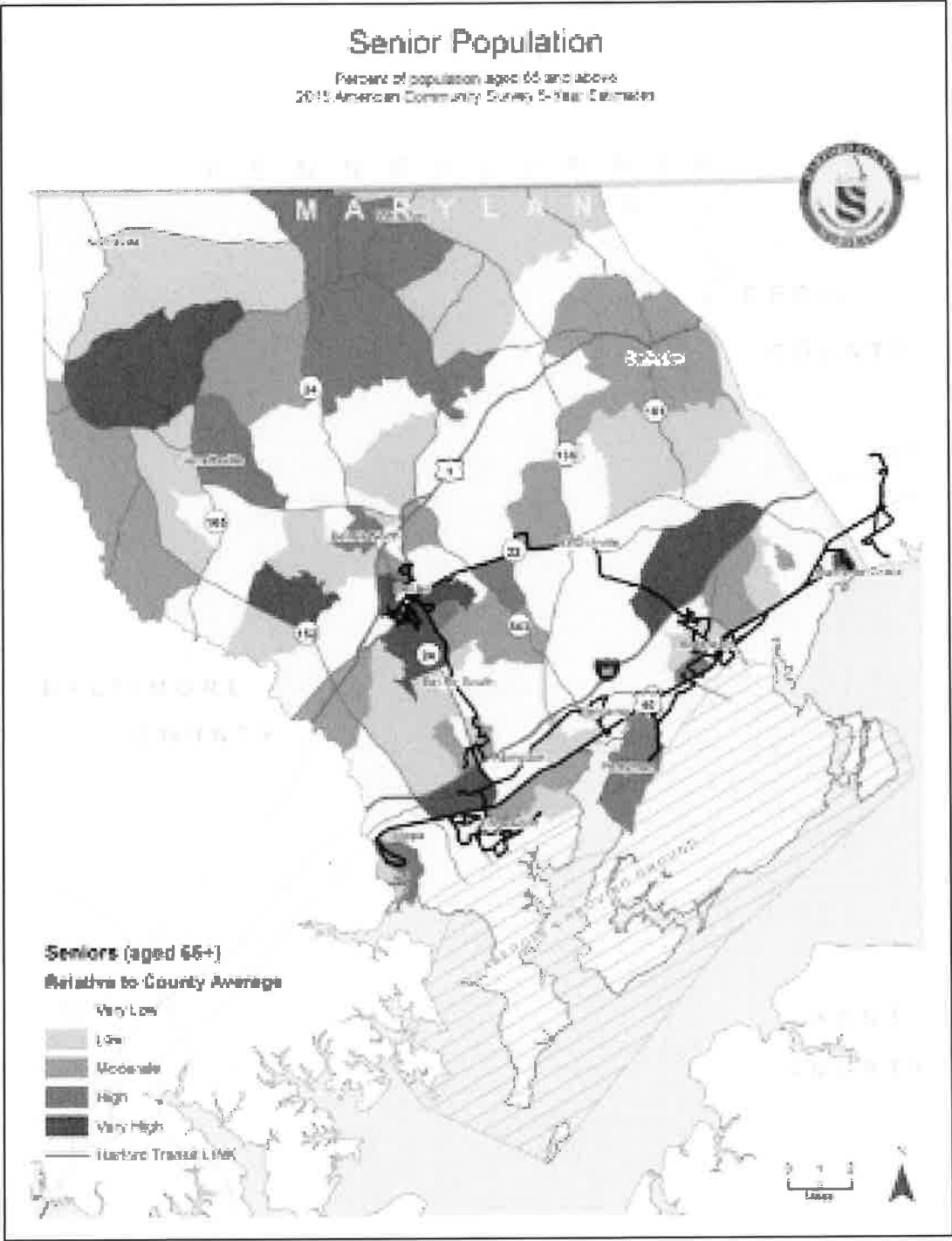
Las quejas se pueden plantear en un período de ciento ochenta (180) días posteriores a la fecha de la presunta acción discriminatoria. Se pueden presentar por correo, teléfono o correo electrónico.

Si tiene alguna pregunta, inquietud o queja o si le gustaría obtener información adicional sobre el Título VI, comuníquese con la Oficina de Relaciones Humanas y Mediación del Condado de Harford (Harford County Office of Human Relations & Mediation):

**Natasha J. Jackson, Gerente**  
**Oficina de Relaciones Humanas y Mediación**  
**125 North Main Street**  
**Bel Air, MD 21014**  
**410-638-4739, Relaciones humanas**  
**410-638-4807, Mediación**

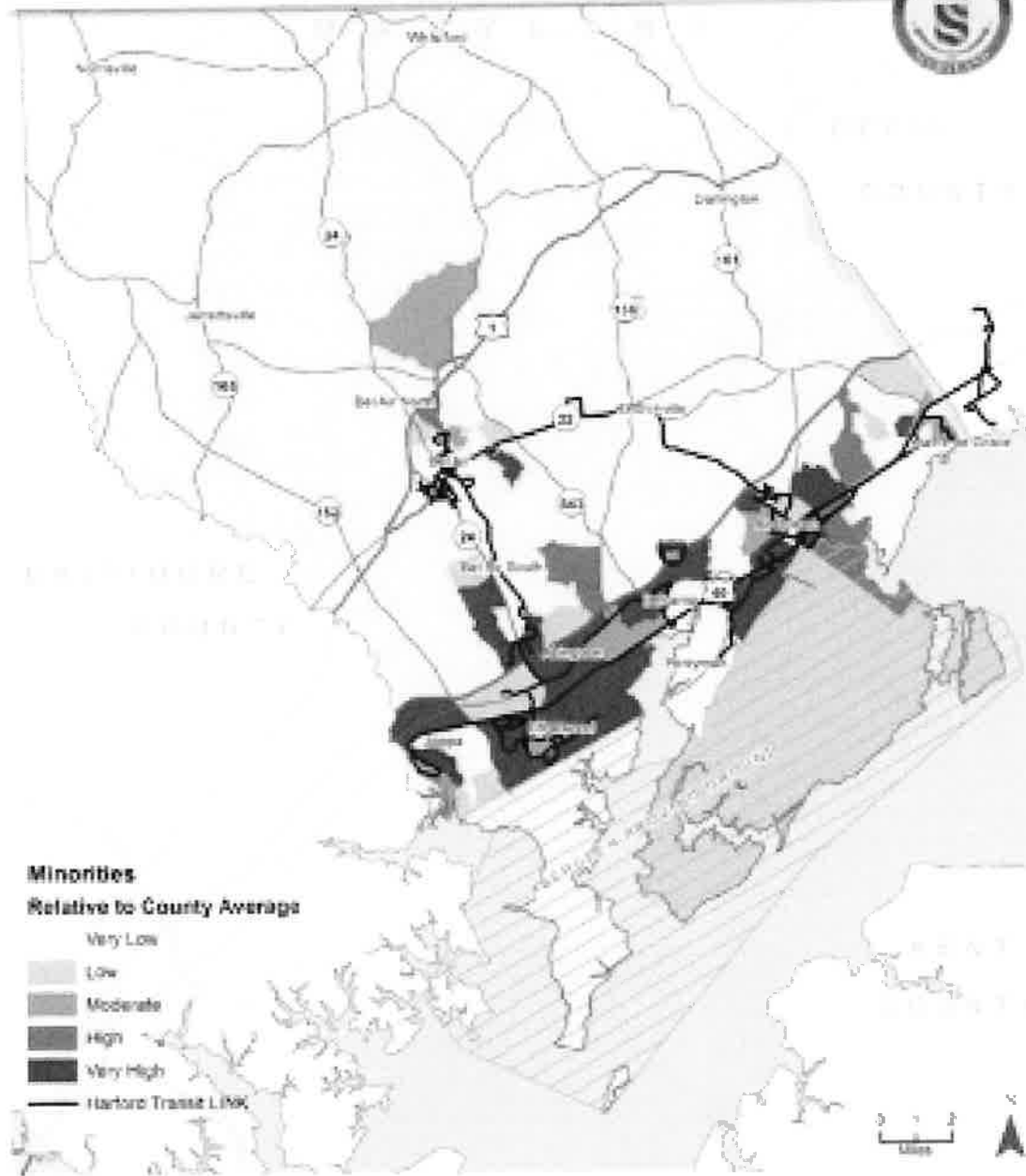


# Population Demographics and Maps



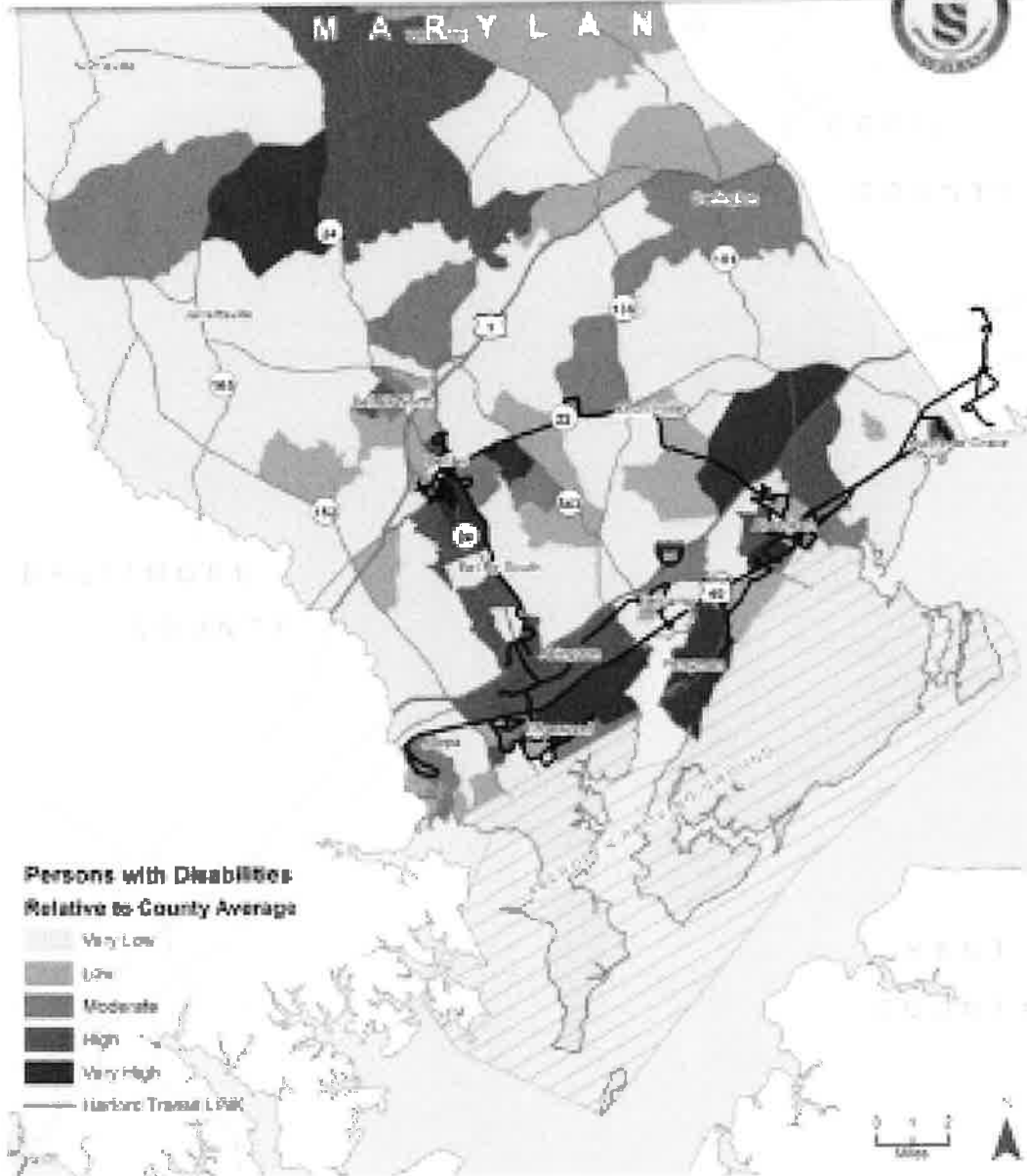
# Minority Population

Percent of minority population  
2013 American Community Survey 5-Year Estimates



# Disabled Population

Percent of population with disabilities  
2015 American Community Survey 5-Year Estimates



# Poverty

Percent of population living below the poverty line  
2010 American Community Survey 5-Year Estimates

