

## **Title VI**

### **2015 – 2017 Implementation Plan**

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

### **Queen Anne's County / County Ride**



**Adopted date**

**February \_\_, 2015**

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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 programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

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

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

This document details how County Ride incorporates nondiscrimination policies and practices in providing services to the public.

## II. OVERVIEW OF SERVICES

Queen Anne's County provides Deviated-Fixed route service and specialized demand response services to those who are not able to utilize the public fixed routes either by disability or geography.

SSTAP funding is used for the Demand Response Service. It takes passengers to medical, shopping, business, recreational, and general appointments using scheduled drivers and small vehicles, many of them lift equipped. Furthermore, specialized services and routes for dialysis patients are coordinated with renal care centers in Easton and Chestertown.

5311 funding provides Deviated Fixed Route Service on two routes and Fixed Route Service on one route, and local service established in four regions of the county to include Kent Island, Grasonville, Centreville, and Sudlersville. Route 2 begins at 7:30am and ends at 4:37pm. The route serves as our main in-county public bus route. It originates in Centreville then links Queenstown, Grasonville, Chester, and Kent Island. Route 1 overflow originates in Kent Island at 7:10am then serves and provides access to Easton and then back into Queen Anne's County at Grasonville. The pm overflow originates in Grasonville at 2:07pm and offers service into Easton then returns to QAC via Grasonville, Chester, and Kent Island. Route 1 service route originates in Centreville at 6:45am, follows the Route 2 circuit to Kent Island then provides service back to Grasonville then onto Easton in the am and later in the afternoon. Grasonville serves as a transfer point for Routes 1 and 2. Route 2 shuttles riders to Grasonville that want to access Chesapeake College and Easton from points past Grasonville to the Bay Bridge/Kent Island. Route 3 offers service from Centreville, Queenstown, Grasonville, and Kent Island into Annapolis, MD with connection in am and pm to downtown Annapolis at Church Circle and in the midday connection to the Anne Arundel Medical Center and the Annapolis Mall.

Deviated-Fixed Routes serve shopping centers, senior centers, medical centers, businesses, Chesapeake College, and many other residential areas. All routes are available for use by the general public and all routes charge a \$3.00 one way fare for the general public and \$1.50 for seniors (60+) and disabled. Monthly passes and ticket books can also be purchased. Passengers are encouraged to schedule medical trips around these routes as well to relieve the stress on the SSTAP program.

County Ride is the public transit system for Queen Anne’s County. The County Ride team is committed to assisting and increasing the transportation and mobility options of our county residents. Our staff will provide quality transit services to the general public and specialized services for seniors and persons with disabilities who are unable to use the fixed-route public system.

### **Public Deviated Fixed-Routes and Fixed Route 3**

**Route 1-** The service is provided from Centreville, Grasonville, Queenstown, Stevensville, and Wye Mills into the Town of Easton in Talbot County. . Route 1 operates Monday through Friday 6:45am to 4:22pm.

**Route 2-** Serves Centreville, Stevensville, Grasonville, and Chester. Route 2 operates Monday through Friday 7:30am to 4:37pm.

**Route 3 -** Service from Centreville, Queenstown, Stevensville to Annapolis. Stops at Church Circle, AAMC, Annapolis Mall. Route 3 operates Monday through Friday 6:30am to 4:45pm.

#### **Routes 1, 2 & 3 Fares**

<b>General Public:</b>	\$3.00 one way	
<b>Seniors and Disabled:</b>	\$1.50 one way	
<b>All day pass:</b>	\$5.00	
<b>Monthly Pass:</b>	\$80.00 General Public	\$35.00 Seniors/Disabled
		\$40.00 Students

Free transfers to complete a one way trip.

Books of 10 tickets can also be purchased for \$30.00 for the General Public and \$15.00 for Seniors/Disabled.

### **Specialized Services / Demand Response**

410-758-2357 or 410-758-2361

Specialized Service operates Monday through Friday from 6:00am to 4:00pm. Eligibility required, please call ahead no less than 48 hours to schedule a trip.

Curb-to-curb demand response service for general public, seniors and persons with disabilities for those not able to access public routes.

#### **Special Service Fees**

<b>Up to 25 miles Round Trip:</b>	<b>\$5.00 General Public</b>	<b>\$2.50 Seniors/Disabled</b>
<b>26-50 Miles Round Trip:</b>	<b>\$10.00 General Public</b>	<b>\$5.00 Seniors/Disabled</b>
<b>Over 50 Miles Round Trip:</b>	<b>\$20.00 General Public</b>	<b>\$10.00 Senior/Disabled</b>
<b>Mileages over 50 miles may require approval.</b>		

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

County Ride 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.

County Ride'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.

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Signature of Authorizing Official

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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).

#### **IV. NONDISCRIMINATION ASSURANCES TO MTA**

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

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, County Ride 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).

In signing and submitting the assurance, County Ride confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

**V. PLAN APPROVAL DOCUMENT**

**I hereby acknowledge the receipt of the County Ride Title VI Implementation Plan 2014-2017. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of County Ride's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.**

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Signature of Authorizing Official

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DATE

**NAME: James Moran**

**TITLE: Commission President**

**AGENCY: Queen Anne's County Commissioners**

## **VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

Under the authority of County Ride, the Chief of Operations will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

### **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, and internal education.

### **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 as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency 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 the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

## **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, County Ride will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, County Ride is required to submit a Quarterly Report Form to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. County Ride will also maintain and provide to the MTA an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

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

### **3. Annual review of Title VI program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, 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 our Title VI program will be disseminated to agency 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 if that person believes that he, she 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. County Ride will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to MTA.

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

Our 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 the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

### **7. Internal education**

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. 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.

**Title VI training is the responsibility of the Chief of Operations.**

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

In all federal procurements requiring a written contract or Purchase Order (PO), County Ride's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will ensure appropriate non-discrimination clauses are included.

## **VII. GENERAL REPORTING REQUIREMENTS**

### **REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, County Ride shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc.

### **TITLE VI COMPLAINT PROCEDURES**

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

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall 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 shall be available on the recipient's website and at their facilities

### **Narrative**

Any individual may exercise his or her right to file a complaint with County Ride if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to 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.**

A copy of County Ride's Title VI Complaint Form is attached as APPENDIX C.

## **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits**

Should any Title VI investigations be initiated by FTA or MTA, or any Title VI lawsuits are filed against County Ride, the agency will follow these procedures:

### **Procedures**

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager.

The complaint is to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint 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, and 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 shall be submitted to the Title VI Manager at 104 Powell Street Centreville, MD 21617 and or by email to [sscott@qac.org](mailto:sscott@qac.org)
  - d. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
    - a. notify MTA (no later than 3 business days from receipt)
    - b. notify Department of Community Services Authorizing Official
    - c. ensure that the complaint is entered in the complaint database.
  3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

4. The complainant will 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. If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
  - a. investigating contractor operating records, policies or procedures
  - b. reviewing routes, schedules, and fare policies
  - c. reviewing operating policies and procedures
  - d. reviewing scheduling and dispatch records
  - e. observing behavior of the individual whose actions were cited in the complaint.
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MTA, and if appropriate our legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.
13. A complaint may be dismissed for the following reasons:
  - a. the complainant requests the withdrawal of the complaint
  - b. an interview cannot be scheduled with the complainant after reasonable attempts
  - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint

## **PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan**

### **Introduction**

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

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

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

County Ride established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

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

SEE APPENDIX D-Summary of Outreach Efforts

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

**THE LAP is INCLUDED AS APPENDIX E**

## **MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient 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.”

County Ride has a transit-related, non-elected advisory council, the membership of which we select.

County Ride in partnership with Maryland Access Point (MAP) has membership guidelines.

### **MEMBERSHIP**

Section 1. The membership of this organization shall be Active and Advisory.

Section 2. The Active Membership shall consist of up to seven (7) members representing a cross-section of the racial, economic and geographic distribution of citizens within the County, as applicable. All active members must be at least 18 years of age. Every effort shall be made in recruitment to have membership matching most current census data for the County.

Section 3. The Advisory Membership shall be open to anyone who is directly, by profession, is involved in providing services to county residents who avail themselves of transit services either by need or choice.

**SEE APPENDIX F- TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE**

## VIII. REQUIREMENTS OF TRANSIT PROVIDERS

County Ride 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. County Ride has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons.

### Service Standards

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that that distribution affords users equitable access to these services. The agency's routes service low income and minority areas. The routes provide service to low income housing units and senior income based housing in Centreville, Grasonville, and Kent Island. The agency's demand responsive services are available to all callers on a first-come first service basis, without regard for race, color or national origin.

The following system-wide service standards are used to guard against service design or operations decisions from having disparate impacts. All of County Ride services meet the agency's established standards; thus it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

- **Vehicle load** -Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The standard for maximum vehicle load is 100%. County Ride has a policy that no standees are allowed on buses where the buses may reach speeds of 55+mph. Therefore, there are no standees allowed on any County Ride Routes or demand response service. All of County Ride services meet this standard.

	Bus (Connectors)	Bus (Shuttles)
Peak	100% maximum average	100% maximum average
Off-Peak	100% maximum average	100% maximum average

- **Vehicle headway** -Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for vehicle headways is 60 minutes for all rural route service. Within the system, headway only applies to Route 2. All other routes have one bus on each route at a time, and then circulate to repeat the route. Route 2 meets the 60 minute headway standard
- **On-time performance** -On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." The

standard for on-time performance is. County Ride defines its “on-time” window as 0 to five minutes late, with no vehicle leaving a point early. All of County Ride services meet this standard. On time performance is measured by random checks performed by management or random video camera checks which use google maps, video, and time stamps. Performance management is conducted with those not following procedure.

	Bus (Connectors)	Bus (Shuttles)
Percent On-time	85%	85%

- **Service availability** - Service availability is a general measure of the distribution of routes within a transit provider’s service area or the span of service. The standard for service availability in a rural setting for stop/mile is as needed and 0/0 hhs within ¼ mile walk for population coverage. All of County Ride’s services meet these standards.

### **Service and Operating Policies**

The County Ride service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities – Transit** amenities are “items of comfort, convenience, and safety” available to riders. They include but are not limited to: seating, shelters/canopies, information (signs, maps, schedules, digital displays), and trash receptacles. The distribution of amenities throughout the system is generally a function of ridership. County Ride will distribute transit amenities equitably throughout the service area based on boarding levels. It will prioritize major transfer points and stops along multiple routes.
- **Vehicle assignment** - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. County Ride 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. All vehicles are rotated randomly throughout the system and service area unless ridership dictates for larger capacity buses. County Ride has two vehicles equipped with bike racks. County Ride also attempts to keep buses with

cameras on routes as much as possible in order to manage standard-on-time-performance.

### **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 review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. 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 annual grant application (ATP) for submission to the MTA.

### **Fare and Service Changes**

County Ride follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, County Ride 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.

**Appendix A: Title VI Notice to the Public; List of Locations**

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).

County Ride is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by County Ride, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

<b>Name:</b>	<b>Steve Scott</b>
<b>Title:</b>	<b>Chief of Operations</b>
<b>Agency Name:</b>	<b>County Ride</b>
<b>Address:</b>	<b>104 Powell Street</b>
<b>City, State Zip code:</b>	<b>Centreville, MD 21617</b>
<b>Telephone Number:</b>	<b>410-758-2361</b>
<b>Email address:</b>	<b><a href="mailto:sscott@qac.org">sscott@qac.org</a></b>

**Appendix B: Title VI Complaint Form**

**Section 1**

Name:

Address:

Telephone (Home): Telephone (Work):

Electronic Mail Address:

Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	

**Section II:**

Are you filing this complaint on your own behalf? Yes\* No

\*If you answered "yes" to this question, go on to Section III.

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

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes No

**Section III:**

I believe the discrimination I experienced was based on (check all that apply):

Race  Color  National Origin

Date of Alleged Discrimination (Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

**Section IV**

Have you previously filed a Title VI complaint with this agency? Yes No

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes  No

If yes, check all that apply:

Federal Agency:

Federal Court  State Agency

State Court  Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

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

Signature and date required below

Signature Date

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

Queen Anne's County Department of Community Services

104 Powell Street

Centreville, Md. 21617

**Appendix C: Investigations, Lawsuits and Complaints Document****List of Investigations, Lawsuits and Complaints**

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color or national origin)	<b>Status</b>	<b>Action(s)</b> <b>taken</b>
<b>Investigations</b>				
<b>1.</b>				
<b>Lawsuits</b>				
<b>1.</b>				
<b>Complaints</b>				
<b>1.</b>				

## **Appendix D: Summary of Outreach Efforts**

**County Ride will do the following:**

- a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.**
- b. Employing different meeting sizes and formats.**
- c. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.**
- d. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.**

## Appendix E: LAP Plan

### COUNTY RIDE

## LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

### Introduction and Legal Basis

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 13116, 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. The following LEP language implementation plan, developed by County Ride is based on FTA guidelines.

As required, County Ride developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, County Ride has evaluated data to determine the extent of need for translation services of its vital documents and materials.

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

### 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**

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

### **U.S. Census Data – American Community Survey (2008-2012)**

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by County Ride’s service area. The agency’s service area includes a total of 791 persons with Limited English Proficiency (those persons who indicated that they spoke English “not well,” and “not at all” in the 2008-2012 ACS Census) or 1.75% of the total population.

Information from the 2008-2012 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. 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.

• Spanish and Spanish Creole	561	1.24%
• German	80	0.18%
• French	41	0.09%
• Other and unspecified languages	31	0.07%

It is noted that there are relatively low number of LEP persons in the service area - no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

### **Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System**

County Ride reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Calls to County Ride’s customer service telephone line;
- Access to the agency’s website ;
- Contact with the agency’s ADA complementary paratransit system (including making reservations, and communicating with drivers).

County Ride has only had contact with Spanish speaking individuals on our buses and over the phone. Contact varies but would probably be no more than one or two contacts per week.

County Ride has a bi-lingual driver we can use to communicate with those riders if needed. Questions asked have only been related to use of our routes.

We will continue 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 accurately assess the frequency of contact.

County Ride works with the Family Support Center, Queen Anne's County's Local Management Board, and the County Ride / MAP Advisory Board to identify possible needs and or opportunities to assist LEP individuals.

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

County Ride provides the following services:

Based on past experience serving and communicating with LEP we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

County Ride – Route 1 and Route 2

The following are the most critical services provided by County Ride for all customers, including LEP persons.

- Public transit services
- ADA paratransit services (if your agency operates fixed-route), including eligibility certification process
- Other paratransit services
- Services targeted at low income persons

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

*Costs*

The following language assistance measures are currently being provided by County Ride.

- Bilingual schedules and bilingual website through Maryland Upper Shore Transit (MUST). The total cost to the agency would be estimated at \$1,000.00 per year, which is a percentage of a total of \$3,500.00 to \$5,000.00 service agreement fee paid to MUST.

We anticipate that these activities and costs may increase as follows. In county advertising, schedules, and website having bilingual information. Estimate costs at \$2,500.00 for first year and based on changes in services, schedules, and demand future costs may be held constant or less.

Based on the analysis of demographic data and contact with community organizations and LEP persons, County Ride has not determined that additional services may be needed to provide meaningful access.

### ***Resources***

There is no available budget that could be devoted to additional language assistance expenses. County Ride would need additional funds to provide additional resources.

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

- Our current services are deemed appropriate at this time.

### **LEP Implementation Plan**

Through the four-factor analysis, County Ride has determined that the current types of language assistance are effective currently. Additional in county publications and advertising about our services may be able to leverage our results and positively impact ridership.

### ***Staff Access to Language Assistance Services***

Agency staffs that come into contact with LEP persons can access language services by contacting our bilingual staff. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

### ***Responding to LEP Callers***

Staff who answer calls from the public respond to LEP customers as follows: try to get as much information as you can, get contact information, and then alert bilingual employee to follow up with customer.

### ***Responding to Written Communications from LEP Persons***

The following procedures are followed when responding to written communications from LEP persons: We have never had any written communication from LEP persons. If we do we will provide them to bilingual staff for assistance.

### ***Responding to LEP Individuals in Person***

The following procedures are followed when an LEP person visits our customer service and administrative office: We have never had any in person visits from LEP persons. If we do we will do whatever we can to assist and contact bilingual staff for assistance

The following procedures are followed by operators when an LEP person has a question on board a County Ride vehicle: Drivers will contact bilingual staff by radio and ask for assistance.

As noted previously, all County Ride staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.

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

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

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive 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:

- following our Title VI policy statement included on our vital documents.
- on our MUST website.
- 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.
- staffing a table with bilingual staff at community service events of interest to LEP groups.

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

### ***Monitoring/Updating the Plan***

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, County Ride will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic internal meetings with staff who assist LEP persons, review of updated Census data, formal studies 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, County Ride will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore County Ride will attempt to identify the most cost-effective approaches.

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



