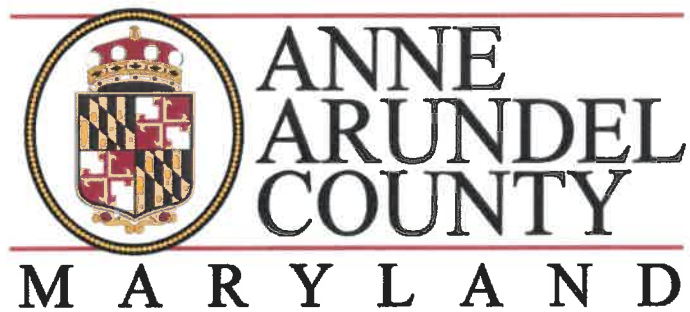


**Title VI**

**2018-2020 Implementation Plan**

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

**ANNE ARUNDEL COUNTY**



**Adopted date**

**December 13, 2017**

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**Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:**

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) approved the results of the analysis

## 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 Anne Arundel County incorporates nondiscrimination policies and practices in providing services to the public.

## **II. OVERVIEW OF SERVICES**

Anne Arundel County provides transit service in Anne Arundel County through a purchased transportation option with Regional Transportation Agency of Central Maryland in Maryland. RTA provides fixed route service east-west between Odenton - BWI Airport. The primary transfer points for Anne Arundel County are the Arundel Mills and the BWI Airport.

Anne Arundel County contracts its service out to provide fixed route service and complimentary paratransit on four routes with 7 peak period buses. In FY 17, the contractor provided approximately 20,710 annual platform hours and carried approximately 179,748 passenger trips. In FY18, Anne Arundel County along with Maryland Transit Administration introduced a new service, which connects the Odenton MARC to the Savage MARC Train Stations.

The demand response service compliments the fixed route service. RTA Mobility includes both ADA and General Paratransit service modes. The ADA system provides curb-to-curb service to eligible disabled individuals within a three-quarter mile radius of the RTA fixed-route system.

The General Paratransit Service of Anne Arundel County provides purposed/ destination focused trips only for Anne Arundel County residents who qualify for this service based on their age or disability. All of these demand response trips are provided with approximately 25 peak period van-type vehicles. In addition/ the ADA service utilizes supplementary private taxi providers under contracted with Anne Arundel County to accommodate the excess demand.

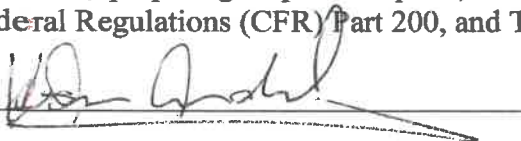
Anne Arundel County is a participant in the state rideshare and transportation demand management program as a full member. As a member Anne Arundel County is also associated with the Washington Metropolitan Council of Government (WASHCOG) Commuter Connections. Anne Arundel County with the assistance of carpool and vanpool matching, as well as providing trip planning assistance to employers for the use of all modes of transportation.

### III. POLICY STATEMENT AND AUTHORITIES

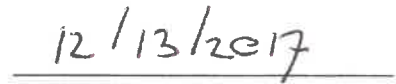
#### Title VI Policy Statement

Anne Arundel County 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.

Anne Arundel County'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



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, Anne Arundel County 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).

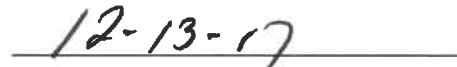
In signing and submitting the assurance, Anne Arundel County confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

**V. PLAN APPROVAL DOCUMENT**

**I hereby acknowledge the receipt of the Anne Arundel County Title VI Implementation Plan 2018-2020. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Anne Arundel County 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.**



Signature of Authorizing Official

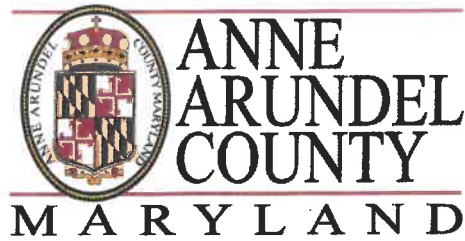


DATE

**Ramond A. Robinson**

**Anne Arundel County**





Transportation Commission Meeting Minutes **DRAFT 12/15/17**  
December 13, 2017 6:30 pm – 8:00 pm

**Meeting Location:** *Independence Room, 2664 Riva Road, 1st Floor, Annapolis, MD 21401*

**Member/Designate Attendees:** *Mary Lynn Bobbitt, Jon Korin, Julie Mussog, Alex Plinie, Joelle Ridgeway, John Spencer, Arjan van Andel, Venus Williams*

**Members Absent:** *Gina Dyer, Amy Jones, Kirkland Murray, Lisa Renshaw*

**County Staff Attendees:** *Ramond Robinson, Crystal McGill-Belk, Brian Ulrich, Martha Arzu-McIntosh, Lynn Miller (OPZ), Dawn Thomas (AACDRP)*

**Guest Attendees:** *Kwaku Duah (Annapolis), Richard Ensor (Arnold Preservation), Erik Evans (Downtown Annapolis Partnership), Fred Fravel (KFH), Rick Gordon (Annapolis) Jason Quan (KFH), Ron Skotz (RTA), Kristine Smith (S. County Women's Huddle), ?? (Sabra, Wang)*

**Administrative Assistant(s):**

*Note: Actions are shown in **Bold** below and resolutions are underlined.*

---

## **I. Call to Order (Arjan)**

Arjan chaired and opened the meeting as co-chair and offered regrets from Chair Amy Jones who was away on business travel. Attendees introduced themselves. Approval of November minutes was deferred to the January meeting. **From here forward the minutes of each meeting will be uploaded to the shared Drive well in advance of the following meeting to allow time for review, comment and approval.**

## **Opening Remarks (Arjan)**

Arjan proposed that each meeting a different member will have 5 minutes to describe their background and objectives for serving on the committee. Arjan did so at this meeting with a short presentation describing his professional experience in transportation and the critical need to improve county mobility choices. He described mobility best practices and trends globally and recommended members review the sample documents he upload to the Drive. **Alex offered to take the January meeting.**

## II. Updates

- A. **Multimodal Transportation Legislation** – Jon provided background on the Bike Commission’s recommendation to update the County Code so that it focus not just on motorized transportation but all modes to include walking, biking and transit. A draft bill has been circulated and a working group of Bike Commission and MBIA reps will meet to seek a draft with joint support. There was discussion of the costs and benefits of the approach. Jon requested support for the concept. John recommended that documents be distributed for subsequent discussion. **Jon will upload documents.**
- B. **Roles and Responsibilities** – Ramond described the roles and responsibilities of the commission and also the new Office of Transportation. The scope for both includes all current and future modes of transportation in and through the county, not just that which is controlled by the county. This include transportation facilities and services provided by the City, County, State, Federal, Regional and private organizations. The top priority for the commission is the Transportation Functional Master Plan which has the same scope.

## III. Consent Items

- A. **Title VI Plan – Resolution** - Ramond described the requirements for a Title VI Plan as required by federally funded programs. The Plan was drafted by the Office of Law and reviewed by county departments. It is based on prior plans and updated to reflect County responsibilities. Alex moved that we approve the plan and Julie seconded. The plan was unanimously approved.
- B. **County Budget Recommendation Letter** – Arjan described the draft letter from the Commission to the County regarding transportation recommendations for the FY19 Budget. Even though the Commission is new, we still feel it is important to provide input. **Arjan will upload a Google Sheets version and members should review the draft in the Drive and provide comments via email or markup.** It will be on the Consent list in January so it can be delivered immediately following that meeting.

## IV. Transit Development Plan Overview

KFH provided a summary of the draft TDP for the county. It is a 5 year plan for the region that also includes Howard County. Annapolis does it's own TDP. The full plan is in the Drive. There was discussion of including south county and also transit service to DC. **Members may email comments using a Google Group email list that Arjan will provide.**

## V. Transportation Functional Master Plan (TFMP)

Sabra, Wang provided an overview of the TFMP which is a strategic transportation plan for the county with an outlook to 2045. There was discussion of the need for a robust visioning process that fully considers new technologies, techniques, best practices, land use, demographic trends, etc. It must be more than a tactical list of projects as shown. The process should also embrace public participation. **Adequate time should be allotted in the January meeting to address the TFMP process and to start on developing a commission view of the 2045 Vision.**

## VI. **Adjourned**

The meeting ended at approximately 8:30 pm.

The next meeting will be on Wednesday, January 10, 2018 at 6:30 PM at the same location. **(NOTE: We should consider scheduling the next meeting for 2 hours to allow adequate time for the TFMP).**

---

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

Under the authority of Anne Arundel County, the Human Relations Compliance Officer 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, Anne Arundel County 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, Anne Arundel County 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. Anne Arundel County 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
- Public Participation Plan (PPP)
- Language Assistance Plan (LAP)
- 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
- Minority representation on Committees by race
- 

## **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. Anne Arundel County Government 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 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 Annual Title VI Program Review (item 3 above), the Title VI Manager will determine if 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 Human Relations Compliance Officer**

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

In all federal procurements requiring a written contract or Purchase Order (PO), Anne Arundel County Office of Central Service’s will include appropriate non-discrimination clauses. The Title VI Manager will work with the Purchasing Officer who is/are responsible for procurement contracts and PO’s to 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, Anne Arundel County 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 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).

Anne Arundel County 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 need more information or feel you are being denied participation in or being denied benefits of the transit services provided by *Anne Arundel County*, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Name: Alanna W. Dennis**

**Title: Human Relations Compliance Officer & Title VI Manager**

**Agency Name: Anne Arundel County Government**

**Address: 44 Calvert Street, Suite 330**

**City, State Zip code: Annapolis, MD 21401**

**Telephone Number: 410-222-1234**

**Email address: Exdenn45@aacounty.org**

*Please reference Appendix A*

## **TITLE VI COMPLAINT PROCEDURES**

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

To comply with the reporting requirements established in 49 CFR Section 21.9(b), Anne Arundel County shall develop procedures for investigating and tracking Title VI complaints filed against us and will make these procedures for filing a complaint available to members of the public. Anne Arundel County has also developed a Title VI complaint form. The form and procedure for filing a complaint are available on the Anne Arundel County at [www.aacounty.org/transportation](http://www.aacounty.org/transportation) website and at their facilities.

Any individual may exercise his or her right to file a complaint with *Anne Arundel County* 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.**

**Anne Arundel County** 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:

*Anne Arundel County 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 the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Anne Arundel County nondiscrimination policies and procedures, or to file a complaint, please visit the website at [www.aacounty.org](http://www.aacounty.org) or contact (Alanna W. Dennis, Human Relations Compliance Officer at 44 Calvert Street, Annapolis, Maryland 21401 at 410-222-1234).*

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 agency's facilities, and are also included within *Anne Arundel County's* website at <http://www.aacounty.org/>.



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

Instructions for filing Title VI complaints are posted on the agency's website and provided below. Should any Title VI investigations be initiated by FTA or MTA, or any Title VI lawsuits are filed against Anne Arundel County 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 44 Calvert Street Annapolis, Maryland 21401 and or Exdenn45@aacounty.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 Anne Arundel County 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 after 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. After 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

***Please reference Appendix B***

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

### **Background**

All recipients shall 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 shall 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 shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

*Please reference Appendix C*

## **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 Anne Arundel County 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.

Anne Arundel County 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.

Anne Arundel County 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.

**NOTE: FTA has developed a Circular, 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” that includes many examples of effective strategies for engaging minority and low-income populations. FTA Chap. III-5 FTA C 4702.1B encourages recipients to review that Circular for ideas when developing their public engagement strategy.**

**Anne Arundel County sample of effective public outreach practices are as follows:**

- a. Determining and identifying what meetings and program activities lend themselves to client public participation.
- b. Scheduling and hosting meetings and programs at times that allow the public the ability to attend and in locations that are convenient and accessible for minority and LEP communities. Public Meetings or public comment periods are advertised in several local newspapers/ on our website, in all vehicles and buses and to community organizations in order to provide an opportunity for citizens to offer comment with respect to any operational adjustments or realignments of our routes or schedules Translation services are offered to assist in the translation of the publicly posted announcements.
- c. Arranging different meeting sizes and formats to accommodate specific groups; community centers, libraries/ schools or government buildings accessible by public transportation Assistance is provided by a bi-lingual staff member and public meetings.
- d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- e. 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.
- f. 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.
- g. Press releases are sent to media outlet when changes to services are altered with proposals for new service or changes to existing services and events surrounding transportation.
- h. Anne Arundel County maintains a comprehensive [www.aacounty.org/Transportation](http://www.aacounty.org/Transportation), which is updated regularly and includes the Title VI Plan, and complaint procedures including how to submit a complaint. Submittal options include; email through our website, written submittal to the Administrative office, phone call to customer service or by fax. The website also links to the contract operator service [www.transitRTA.com](http://www.transitRTA.com) which has Google Translator tab at the top of the page allows readers to translate the entire content into 90 different languages.
- i. Anne Arundel County provides travel training through the Center for Transportation Equality's Travel Training Program at events.

***Please reference Appendix D***

**ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS**  
**LANGUAGE ASSISTANCE PLAN (LAP)**

**Anne Arundel County**

**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 Anne Arundel County is based on FTA guidelines.

As required, Anne Arundel County developed a written LAP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Anne Arundel County 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.

***Please reference 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.”

Anne Arundel County has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

1. **The Anne Arundel County Transportation Commission** is an advisory committee, made up of members of the public. The Commission advises the County Executive and County Administration of transportation matters. Members are volunteers and are appointed by the County Executive.
2. *Please provide a table(s) depicting the racial breakdown of the membership of those committees*

*Please reference Appendix F*

## **VIII. 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, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

#### **REQUIRED: Service Standards and Policies**

- **Service Standards**
  - Vehicle load, Vehicle headway, On-time performance, Service availability
- **Service Policies**
  - Transit amenities, Vehicle assignment

Anne Arundel County 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. Anne Arundel County 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. As shown in the following maps, the agency's routes. 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 Anne Arundel County 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.

#### **Load Standards**

The objective of load standards is to balance passenger comfort and safety with operating cost.



- **Load Standards:** The County standard load factors for its bus services in regular service are:
  - 120% of seated capacity for fixed route transit service during peak hour service.
  - 100% of seated capacity for fixed route transit service during off-peak. The County will work not exceed its standard load factors for more than 30 minutes per trip on a given route. If a service is consistently above the seated capacity, then The County will bring to the attention of the board for needed adjustments, not that involve adding additional service outside the scope. Any changes approved will be added to the prior scheduled service change, if funding is available. If the standing load compromises safety in any way, The County will implement additional service to meet the demand.
- **Wheelchair Boarding:** The County will analyze wheelchair boarding annually, and make necessary schedule adjustments. Trippers will be utilized if particular trips continually are not able to provide service to all wheelchair boarding on a given fixed route services.

**Passenger Capacities**

Vehicle Type	Seats	Standing	Total	Load Standards	Max. Standing
Goshen E450 Ford	16	1	17	1.0	1.1
Eldorado	20	15	35	1.0	1.75
30 ft.Gillig Lowfloor	25	10	35	1.4	1.6

***On-Time Performance***

The County will perform reliably in accordance with the public timetables prepared and distributed by the county, on-time performance standards have been established. A vehicle is considered “late” when it arrives five (5) minutes or more after the scheduled time. A vehicle is considered “early” if it departs one (1) minute or more prior to the scheduled time. All other trips are considered “on time”.

- **On-Time Performance:** The County bus routes that achieve an on-time performance score of 75 percent (75%) or less over a course of two (2) service changes will be reviewed and remedial action to improve performance will be put in place at the next service change.

***Duplication of Service:*** Service duplication occurs when two (2) or more bus routes serve the same roadway. Duplication of service can sometimes be needed or unavoidable due to the presence of activity centers or the lack of alternate routing options. When services share the same street segment the county will do the following:

- **Duplication of Service:** If two (2) services use the same street, schedules should be adjusted to maximize frequency on the shared alignment.

***Route Directness:*** The County will design bus routes to operate as directly as possible to and from major destinations in order to minimize passenger travel time. Routes shall operate on major arterial streets as much as possible. When a deviation exists or is being considered, the gain in convenience to those passengers who are boarding or alighting during the deviation must be balanced against the additional travel time for the passengers traveling through.

- **Directness:**
  1. To the extent possible, bi-directional service shall be provided on the same street.
  2. Express service shall be routed in the most direct manner possible.
  3. Deviations from the basic route alignment to serve activity centers will be made only when they have the potential to attract new riders equal to or exceeding the route performance evaluation standard for the corresponding route category.
  4. Additional time to operate route deviations should not exceed five (5) minutes (one-way) or 10 percent (10%) of the one-way run time, whichever is less.
  5. No mid-route loops shall be operated.
  6. Terminal loops shall not exceed 25 percent (25%) of a route's total length for routes that exceed 30 minutes in one-way travel time.

***Route Patterns:*** It is sometimes more efficient to provide service to a certain area with one route having several branches than to operate several different routes. In addition, some bus trips on a route may not go to the end of the line due to very low ridership in that area at a particular time of day, also known as a turnback. These service designs can result in a route network that is difficult for current and potential customers to understand and utilize. Therefore, to provide a user-friendly service and to encourage maximum use of the system by all current and potential riders, standards for branches and turnbacks shall be set.

**Route Patterns:**

- **No route shall have more than two (2) distinct branches.**
- **No route shall have more than one (1) turn around on a given branch.**

When two (2) routes are interlined, each route shall be treated as a separate route for the application of this standard.

***Service Frequency and Span-*** Service frequency is established to provide a sufficient number of vehicles to accommodate passenger volume at the most crowded location(s), during a given time period. On high ridership routes, the frequency of service provided is a function of demand and peak period loads. Service span refers to the hours that service is provided and defines the minimum period of time that service will operate at any point in the system.

- **Headways/ Frequency:** The policy headway for the county local and neighborhood shuttle bus routes will be 60 minutes or better. Crosstown services will be no greater than 120 minutes in frequency during peak or non-peak service. In peak periods, 30-minute headways will be the norm on local routes unless low demand warrants less frequent service. Express services will have a minimum of three (3) trips in each am and pm peak bi-directionally 60 minutes or better.
- **Service Span:** Fixed Route Bus and Special Transportation Services will operate between 5:30 a.m. and 12:00 a.m.

- Exceptions will be based on ridership and productivity.

## **Service and Operating Policies**

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

### ***Bus Stop Spacing and Amenities***

It is recognized that bus stops and amenities help customer's access county services and make their riding experience more comfortable, safe and friendly. Amenities include bus shelters, benches, waste receptacles, and static/electronic travel information signs.

- **Bus Stop Spacing:** Factors that should be considered in determining bus stop locations/spacing are as follows:
  1. Provide stops at major generators (For example: employment centers, residential areas with 500+ units, retail centers, public education centers, major medical facilities).
  2. Provide bus stops at transfer locations.
  3. To the extent possible, provide bus stops at signalized intersections where there are designated crossings.
  4. Provide intermediate stops based on the distance a person has to travel to arrive at a bus stop:
    - Central Business Districts or Major Commercial District: Minimum 500 feet
    - High to medium density areas: 750 to 900
    - Medium to low density areas: 900 to 1,300 feet
    - Low density to rural areas: as needed, no more frequent than 1,500 to 2,500 feet
  
- **Amenities:** Placement of amenities should be based upon factors that consider equity in distribution throughout the service area, and factors that consider the benefit to the user and site-related constraints. Greater consideration should be given to stops on key bus routes due to a generally higher level of demand. Stop locations that have boarding greater than 50 people per day will be given priority.

Other factors that should be considered in determining the priority for amenities at stops are:

- Lengthy wait times between buses (beyond 30 minutes),
- High percentage of transfer passengers (more than 25 percent), and
- High percentage of seniors or disabled persons using the stop (more than 25 percent).

The necessary infrastructure (such as sidewalks) must be in place in order to consider an installation. The integration of the necessary infrastructure and amenities in newly developed or redeveloped areas should be coordinated with the development. The

County should work with private landowners and developers, to the extent practicable, to leverage the construction or the monies to offset the construction costs of necessary infrastructure and bus stop amenities.

- **Accessibility:** County services and passenger facilities will be accessible to people with disabilities in accordance with the rules of the Americans with Disabilities Act (ADA).

### ***Vehicle Assignment***

The County vehicles shall be assigned to specific service types according to the following guidelines. Exceptions to this may take place based upon operational and scheduling practices to maintain optimal efficiency. Vehicles are assigned based on the 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). The contract manager reviews 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.

The contract manager will also 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. Vehicle assignment will consider the age of the vehicle to ensure that it does not consistently exceed the system-wide average and that vehicles are equipped with technology designed to reduce emissions.

- **Vehicle Assignment:** Fleet types should be assigned based on the service type it is intended to serve when feasible.
  - Express Service = 40-foot Hybrid
  - Local Service = 30 and 40-foot low floor
  - Shuttle Services = 30-foot low floor or 29 –foot low floor
  - Crosstown Services = 30-foot low floor or 29 –foot low floor
  - Flex Service= 20-25-foot Demand Response

### **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**

Anne Arundel County follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, Anne Arundel County 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. *[If you receive S.5311: This analysis is also conducted for service and fare changes planned for in the agency's Transportation Development Plan].*

- **Major Service Change and Fare Policy**

All major service changes as specified by the county in coordination with FTA are subject to a Title VI Equity Analysis prior to Commission approval of the service change. The County will work to complete an equity analysis for a major service change and present to the public in the form of public meetings and to the Anne Arundel County Transportation Commission, for its consideration and included in the Title VI program with a record of action taken by the Board.

A major service change is defined by the County as: route elimination, new route creation, change of a route in which is 25% or more revenue miles are adjusted to a different route. In addition, anytime there is a 25% or greater change in revenue hours and/or revenue miles, 25% or greater reduction in span of service or fare change all of which will constitute a major service change.

The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on low-income populations compared to non-low income populations. Exceeding the threshold means that a fare or service change either negatively impacts low-income populations' more than non-low-income populations or that the change benefits non-low-income populations more than low-income populations.

If the threshold is exceeded, the county must evaluate whether there is an alternative that has a more equitable impact.

The County will take steps to propose policy to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by low-income populations compared to non-low-income populations.

The Disparate Impact Policy establishes a threshold for determining whether proposed fare or

service changes have a disproportionate burden on low-income populations versus non-low-income populations.

The threshold is the difference between the burdens borne on minority populations compared to non-minority populations. Exceeding the threshold means that a fare or service change either negatively impacts minority populations more than non-minority populations or that the change benefits non-minority populations more than minority populations.

The County will take steps to avoid, minimize, or mitigate actions that result in a 15 percent disparity between the burdens borne by minority populations compared to non-minority populations.



## Title VI Public Notice

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).

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.

ANNE ARUNDEL COUNTY shall disseminate this information to the public by posting copies of the Title VI public notice in full compliance to Title 49 CFR Section 21.9(d) as listed below:

1. Anne Arundel County website at <http://www.aacounty.org/>
2. Anne Arundel County's Transportation Office, including Transportation reception area, meeting rooms, etc.;
3. Anne Arundel County's public passenger vehicles and ride guide brochures
4. Human Relations Compliance Office reception area located at 44 Calvert Street, Suite 330, Annapolis, Maryland 21201;
5. Anne Arundel County's Department of Aging and Disabilities' Senior Centers in or around the office area or bulletin boards; and,
6. All federally funded Anne Arundel County vehicles.

Any individual may exercise his or her right to file a complaint with Anne Arundel County 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 Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA. If you need additional information or feel you are being denied participation in or being denied benefits of the transit services provided by Anne Arundel County, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact:

*Alanna W. Dennis, Anne Arundel County's Human Relations Compliance Officer (EEO/Title VI)  
44 Calvert Street, Suite 330,  
Annapolis, Maryland 21401  
Email: ExDenn45@aacounty.org*





## Aviso Público del Título VI

El Título VI de la Ley de Derechos Civiles del año 1964 prohíbe la discriminación por motivo de raza, color u origen nacional en los programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI establece que "ninguna persona en los Estados Unidos, por motivo de raza, color u origen nacional, será excluida de la participación, o se le negarán los beneficios de, ni será objeto de discriminación en virtud de ningún programa o actividad que reciba asistencia financiera Federal" (42 USC Sección 2000d).

El Título 49 CFR Sección 21.9 (d) requiere que los destinatarios de los fondos brinden información al público con respecto a las obligaciones del beneficiario bajo las regulaciones del Título VI del Departamento de Transporte (DOT) y que informen a los miembros del público sobre las protecciones contra la discriminación que les otorga el Título VI.

EL CONDADO DE ANNE ARUNDEL divulgará esta información publicando copias del aviso público del Título VI en total conformidad con el Título 49 CFR Sección 21.9 (d) como se detalla a continuación:

1. Sitio web del Condado de Anne Arundel <http://www.aacounty.org/>
2. La Oficina de Transporte del Condado de Anne Arundel, incluyendo su área de recepción, salas de reuniones, etc.;
3. Vehículos públicos de pasajeros del Condado de Anne Arundel y folletos de guías de viaje;
4. Área de recepción de la Oficina de Cumplimiento de Relaciones Humanas ubicada en 44 Calvert Street, Suite 330, Annapolis, Maryland 21401;
5. Los Centros para Personas Mayores del Departamento de la Tercera Edad y Discapacidades del Condado de Anne Arundel en el área de la oficina o en los tableros de anuncios; y,
6. Todos los vehículos del Condado de Anne Arundel financiados con fondos federales.

Cualquier individuo puede ejercer su derecho a presentar una queja ante el Condado de Anne Arundel si cree que ha sido objeto de trato desigual o discriminación en la recepción de beneficios o servicios. Reportaremos la queja a MTA dentro de los tres días hábiles (según los requisitos de MTA) y haremos un esfuerzo concertado para resolver las quejas a nivel local, utilizando los Procedimientos de Reclamación de No Discriminación del Título VI de la agencia. Todas las quejas del Título VI y su resolución serán registradas e informadas anualmente (además de inmediatamente) a MTA. Si necesita información adicional o siente que se le niega la participación o el rechazo a los beneficios de los servicios de tránsito proporcionados por el condado de Anne Arundel, o que se sienta discriminado por su raza, color, origen nacional, sexo, edad o discapacidad, comuníquese con:

*Alanna W. Dennis, Oficial de Cumplimiento de Relaciones Humanas del Condado de Anne Arundel (EEO / Título VI)*  
44 Calvert Street, Suite 330,  
Annapolis, Maryland 21401  
Correo electrónico: [ExDenn45@aacounty.org](mailto:ExDenn45@aacounty.org)



**Title VI Complaint Form**

Please note Anne Arundel County's Transportation Title VI Complaint Form and Complaint Procedures are available in the following locations:

- Anne Arundel County Government website- <http://www.aacounty.org/>
- Hard copies are located within Anne Arundel County's Transportation Office and Human Relations Compliance Office
- Anne Arundel County's Transportation Title VI Plan
- Anne Arundel County's public passenger vehicles and ride guide brochures

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Limited English Proficiency/LEP				
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 or a separate sheet of paper.				
_____ _____ _____				



<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency?	Yes	No
<b>Section V</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
<b>Section VI</b>		
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:  
**Anne Arundel County Government**  
**Alanna W. Dennis, Human Relations (Title VI) Compliance Officer**  
**44 Calvert Street, Suite 330**  
**Annapolis, MD 21401**  
**Telephone Number: (410) 222-1234**



**Anne Arundel County Department of Transportation  
List of Investigations, Lawsuits and Complaints**

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) taken</b>
<b>Investigations</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>1. 2014</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>2. 2015</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>3. 2016</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>Lawsuits</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>1. 2014</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>2. 2015</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>3. 2016</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>Complaints</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>1. 2014</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>2. 2015</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>
<b>3. 2016</b>	<b>None</b>	<b>None</b>	<b>None</b>	<b>None</b>



## **APPENDIX D- SUMMARY OF OUTREACH**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d/ et seq./ provides that no person shall be subjected to discrimination on the basis of race/ color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

### **Identification of LEP Persons Needing Language Assistance**

These methods are used to help identify persons who may need language assistance:

- Examine records from our customer service phone line; of persons who request language assistance. Examine records from past public meetings and events to anticipate the possible need for assistance at future meetings,
- When public meetings are held, a staff member will greet and briefly speak to each attendee, to informally gauge the attendee s ability to speak and understand English.
- Survey other first line staff to assess direct or indirect contact with LEP individuals,

### **Elements of Anne Arundel County Public Involvement Plan and Language Assistance Measures:**

- a. Determining and identifying what meetings and program activities lend themselves to client public participation.
- b. Scheduling and hosting meetings and programs at times that allow the public the ability to attend and in locations that are convenient and accessible for minority and LEP communities. Public Meetings or public comment periods are advertised in several local newspapers/ on our website, in all vehicles and buses and to community organizations in order to provide an opportunity for citizens to offer comment with respect to any operational adjustments or realignments of our 4 routes or schedules Translation services are offered to assist in the translation of the publicly posted announcements. We also offer special travel assistance for those in need.
- c. Arranging different meeting sizes and formats to accommodate specific groups; community centers, libraries/ schools or government buildings accessible by public transportation Assistance is provided by a bi-lingual staff member and public meetings.
- d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- e. 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.

## **APPENDIX D- SUMMARY OF OUTREACH**

- f. 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.
- g. Press releases are sent to media outlet when changes to services are altered with proposals for new service or changes to existing services and events surrounding transportation.
- h. Anne Arundel County maintains a comprehensive website; [www.aacounty.org/Transportation](http://www.aacounty.org/Transportation), which is updated regularly and includes the Title VI Plan, and complaint procedures including how to submit a complaint. Submittal options include; email through our website, written submittal to the Administrative office, phone call to customer service or by fax. The website also links to the contract operator service [www.transitRTA.com](http://www.transitRTA.com) which has Google Translator tab at the top of the page allows readers to translate the entire content into 90 different languages.
- i. Anne Arundel County provides travel training through the Center for Transportation Equality's Travel Training Program at events.

### **Providing Notice to LEP persons of available service:**

Anne Arundel County will utilize press releases, advertising venues, public notice, website communication, Twitter, customized phone recordings. Rider Announcements, and distributed Information cards to communicate availability of service. All press releases/ public notices/ and Rider Announcements are translated into Spanish when requested. Mention of the availability to produce documents in other formats is mentioned in our advertising.

### **Detail List of Events**

1.) Military Bowl – December 27<sup>th</sup>, 2016 9:00 A.M.-3:00 P.M.

Weather: Chilly. 40<sup>o</sup> F until the afternoon. Temps raised to about 60<sup>o</sup> F around 1:00 A.M. and dropped around 3:00 P.M.

Promotional Items Given out: Ice Scrapers with Commuter Connections logo on them

Promotional Literature: Commuter Connections brochures, Guaranteed Ride Home brochure

Number of People at Event: 900

Number of People Who Interacted with Table: 27

Number of Promotional Items Given out: 16

Number of People Interested in Rideshare: 2

Questions and Comments by Visitors: "Who's car do you use when you carpool? If you use your own car, do the other people pay you?"

## **APPENDIX D- SUMMARY OF OUTREACH**

2.) Maryland Live! Casino Job Fair – January 6<sup>th</sup>, 2017 9:00 A.M. – 1:00 P.M.

Weather: Freezing. 35<sup>o</sup> F the whole day

Promotional Items Given out: Ice Scrapers with Commuter Connections logo on them and chap sticks with the Commuter Connections logo and link to the Commuter Connections Website

Promotional Literature: Commuter Connections brochures, Guaranteed Ride Home brochure

Number of People at Event: 90

Number of People Who Interacted with Table: 60

Number of Promotional Items Given out: 150

Number of People Interested in Rideshare: 40

Questions and Comments by Visitors: “I have a car. I can drive other people if they need a ride.” ← Two people said that!

Surveys were handed out. About 1/3 to ½ the visitors either did not have a personal vehicle or did not have a license.

3.) Legislative Reception - January 17<sup>th</sup>, 2017, 6:00-8:00 PM

Weather: Freezing. 49<sup>o</sup> F; warm for a winter evening

Promotional Items Given out: Ice Scrapers with Commuter Connections logo on them and chap sticks with the Commuter Connections logo and link to the Commuter Connections Website; BMC promotional items: Bike to Work Day keychains

Promotional Literature: Commuter Connections brochures, Guaranteed Ride Home brochure, Bike to Work Day rack cards, Bike to Work Day sponsorship forms, BMC literature

Number of People at Event: 75

Number of People Who Interacted with Table: 20

Number of Promotional Items Given out: 20

Number of People Interested in Rideshare: N/A

Questions and Comments by Visitors: Biking to work is important. Last year’s Bike to Work Day was a great event

The purpose of this event was not to promote Rideshare to commuters, but to share information about Rideshare with our legislators to keep them updated on the work we do, and how we improve the quality of life for our citizens.

4.) Budget Town Hall – February 28<sup>th</sup>, 2017

Weather: Slightly warm, rainy; nighttime



## **APPENDIX D- SUMMARY OF OUTREACH**

Promotional Items Given out: Ice Scrapers with Commuter Connections logo on them, chapsticks with Commuter Connections logo on them

Promotional Literature: Commuter Connections brochures, Guaranteed Ride Home brochures, Commuter Choice brochures, general rideshare brochures, Bike to Work Day Flyers

Number of People at Event: 115

Number of People Who Interacted with Table: 22

Number of Promotional Items Given out: 6

Number of People Interested in Rideshare: 3

Questions and Comments by Visitors: “The bus takes a while.” · “I’ve heard of Guaranteed Ride Home”

### **5.) Housing Commission Meeting –March 1, 2017**

Weather: Slightly warm, partly cloudy

Promotional Items Given out: Ice Scrapers with Commuter Connections logo on them, chapsticks with Commuter Connections logo on them

Promotional Literature: Commuter Connections brochures, Guaranteed Ride Home brochures, Commuter Choice brochures, general rideshare brochures, RTA Mobility guides

Number of People at Event: 20

Number of People Who Interacted with Table: 20

Number of Promotional Items Given out: 7

Number of People Interested in Rideshare: 20

Questions and Comments by Visitors: “We need a bus that goes down Telegraph road.” · “The bus drivers are mean to us”. · “Busses take so long [an hour], that they could be waiting for an hour for a bus that MAY not come because it’s broken down”.; They were unaware that an app would locate a bus and that a ride for elderly and disabled is free if they are within ¼ of a mile of their destination.

### **6.) Fort Meade Earth Day Expo – April 20, 2017 10:00 A.M. – 2:00 P.M.**

Weather: Slightly chilly in the morning with rain. Sunny and hot in the afternoon

Promotional Items Given out: Bags with Guaranteed Ride Home on them- had the Commuter Connections on it. Chapsticks with CommuterConnections.org on them. Reflectors with Bike to Work Day 5/19/2017” on them.

Promotional Literature: Guaranteed Ride Home brochures, Commuter Choice brochures, RTA bus schedules, and Bike to Work Day rack cards and flyers

Number of People at Event: 2,000 (estimation)

## **APPENDIX D- SUMMARY OF OUTREACH**

Number of People Who Interacted with Table: 276

Number of Promotional Items Given out: 250

Number of People Interested in Rideshare: 70 (including children who Bike)

Questions and Comments by Visitors: “There are too many dangerous highways for us to Bike to School/Work”. • “Is there a pit stop on the Fort?”

Comment from ME: Multiple people I spoke to lived three to five miles away from the Fort. They indicated that they did not need Rideshare because they lived so close. However, if that many people live that close to the base, I’m led to believe it would be worth it if they all carpooled together from their close neighborhoods. I saw the traffic driving into Fort Meade; it was atrocious.

7.) Bike Health Expo – Saturday, April 29<sup>th</sup>, 2017 10:00 A.M. – 2:00 P.M.

Weather: Rain in the morning. Sunny and hot in the afternoon

Promotional Items Given out: Reflectors for Bike to Work Day

Promotional Literature: Guaranteed Ride Home brochures, Commuter Connections brochures, RTA bus schedules, and Bike to Work Day rack cards and flyers

Number of People at Event: 200 (estimation)

Number of People Who Interacted with Table: 75

Number of Promotional Items Given out: 75

Number of People Interested in Rideshare: 6

Questions and Comments by Visitors: “I’ll put this brochure up in my church”

8.) Fort Meade Safety Expo– Thursday, May 25<sup>th</sup>, 2017 9:00 A.M. – 1:00 P.M.

Weather: Cloudy in the morning. Sunny and warm in the afternoon, but not hot

Promotional Items Given out: Guaranteed Ride Home bags and reflectors left over from Bike to Work Day

Promotional Literature: Guaranteed Ride Home brochures, Commuter Connections brochures, RTA bus schedules

Number of People at Event: 550 (estimation)

Number of People Who Interacted with Table: 123

Number of Promotional Items Given out: 90

Number of People Interested in Rideshare: 16

Questions and Comments by Visitors: “But then I’m stuck”. • “But I only live five miles from work.”

## **APPENDIX D- SUMMARY OF OUTREACH**

9.) Arts and Wine Festival in Annapolis– Saturday, June 10<sup>th</sup>, 2017 3:00 P.M. – 4:00 P.M.

Weather: Sunny and very hot

Promotional Items Given out: Guaranteed Ride Home bags

Promotional Literature: Guaranteed Ride Home brochures, Commuter Connections brochures

Number of People at Event: 90 (estimation)

Number of People Who Interacted with Table: 20

Number of Promotional Items Given out: 10

Number of People Interested in Rideshare: 2

Questions and Comments by Visitors: “I have someone I can give this to.”

This event was booked last-minute by me, the Rideshare Coordinator. I was granted permission, over the phone, by the man who was running the event, to walk around inside the festival to hand out promotional items. There were no more table spots open, but he still offered the option to walk around inside. When I arrived, the front entrance staff did not believe me. They granted me permission to walk around the parking lot and hand out bags as visitors left. Hence, I did not get to reach the volume of people I wanted to. It was also difficult because people would walk out to their cars from all kinds of different parts of the parking lot, so by the time I could walk over to anyone, they would be back in their car ready to leave. Due to my inability to reach people, I left at 4:00 P.M..

10.) BWI Business Partnership Breakfast Sponsor– Thursday, June 15<sup>th</sup>, 2017 7:00 A.M. – 10:00 P.M.

Weather: Warm, but the event was completely indoors

Promotional Items Given out: Guaranteed Ride Home bags

Promotional Literature: Guaranteed Ride Home brochures, Commuter Connections brochures, RTA bus schedules, Commuter Choice Maryland Benefits Brochures

Number of People at Event: 200 (estimation)

Number of People Who Interacted with Table: 20

Number of Promotional Items Given out: 15

Number of People Interested in Rideshare: 4

Questions and Comments by Visitors: Visitors to my table were not citizens.

11.) John Wall Memorial One Mile – Saturday, July 15<sup>th</sup>, 2017 8:30 A.M. – 10:30 A.M.

Weather: Hot, but not overwhelmingly hot

Promotional Items Given out: B2WD leftover lights

Promotional Literature: Guaranteed Ride Home brochures, Commuter Connections brochures, RTA bus schedules, Commuter Choice Maryland Benefits Brochures

## **APPENDIX D- SUMMARY OF OUTREACH**

Number of People at Event: 200 (estimation)

Number of People Who Interacted with Table: 38

Number of Promotional Items Given out: 50

Number of People Interested in Rideshare: 6

Questions and Comments by Visitors: "I already ride my bike to work." \* "I was riding my bike to work, but they started metering the parking lot where I parked my car to bike in."

12.) Standing outside at Arundel Mills Mall RTA stop– Wednesday, July 18<sup>th</sup>, 2017 7:00 A.M. – 8:00 A.M.

Weather: Hot! It wasn't TOO hot around 7:00 A.M., but as the hour progressed...

Promotional Items Given out: None

Promotional Literature: Guaranteed Ride Home brochures, new RTA bus route public hearing pamphlets (nobody wanted them; MAYBE gave out one).

Number of People at Event: 40

Number of People Who Interacted with Table: 35

Number of Promotional Items Given out: 0

Number of People Interested in Guaranteed Ride Home: 35

Questions and Comments by Visitors: "I'll do that." \* "Is it good outside of this county?". This "event" was specifically for telling bus riders about Guaranteed Ride Home. Everyone seemed interested, but we haven't had any successful sign-ups since then. This would be more helpful if we had something to sign up right there.

13.) Hoyt's Theatre Promotional Table– Friday, July 21<sup>st</sup>, 2017 6:30 P.M. – 8:30 P.M.

Weather: Hot, partly cloudy skies, but event was indoors

Promotional Items Given out: None

Promotional Literature: Commuter Connections Ridematching brochures, Guaranteed Ride Home brochures, RTA bus route brochures

Number of People at Event: 250

Number of People Who Interacted with Table: 18

Number of Promotional Items Given out: 3

Number of People Interested in Rideshare: 0

Questions and Comments by Visitors: "Yeah, I'd take a bus if it didn't take three hours!"(in relational to Anne Arundel County routes) \* "That new Baltimore Link messed everything up."

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14.) Sundae Sunday– Sunday, August 13<sup>th</sup>, 2017 1:00 P.M. – 3:30 P.M.

Weather: Hot, sunny

Promotional Items Given out: Commuter Connections Chapsticks

Promotional Literature: Commuter Connections Ridematching brochures, Guaranteed Ride Home brochures, RTA bus route brochures

Number of People at Event: 65

Number of People Who Interacted with Table: 25

Number of Promotional Items Given out: 10

Number of People Interested in Rideshare: 4

Questions and Comments by Visitors: “I used to take the bus out to D.C. every day.” • “When I used to work out in D.C. [years ago], they had a program like that [like the Guaranteed Ride Home Program]”.

14.) Odenton MARC Train Station Promotion– Wednesday, August 30<sup>th</sup>, 2017 3:30 P.M. – 7:00 P.M.

Weather: Very warm, but not super hot, sunny

Promotional Items Given out: Commuter Connections Chapsticks, Guaranteed Ride Home bags, reflectors

Promotional Literature: Commuter Connections Ridematching brochures, Guaranteed Ride Home brochures, RTA bus route brochures, Baltimore Link mini brochures, Info. About the new route

Number of People at Event: 350

Number of People Who Interacted with Table: 300

Number of Promotional Items Given out: 200

Number of People Interested in Rideshare: 32

Questions and Comments by Visitors: “My friend used Guaranteed Ride once. They picked her up fast and she loved it.” • “I’ve been meaning to sign up for Guaranteed Ride Home. I need to do that” (Multiple people said they’ve “been meaning to” as if they have thought about it several times before in the past, but did not go through with signing up). “I tried to use Guaranteed Ride Home once and it was awful. My son got a broken arm, and from the time I called to get the ride and the time it came and brought me home, it would have been faster for me to just get back home on the MARC Train Station. The same thing happened to my friend! His son broke his arm, and... [the GRH people]... were going to give him a rental car, but that person was responsible for bringing the rental car back.” (I guess that made the person very unhappy)

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15.) Spanish Health and Resource Festival- Saturday, September 30<sup>th</sup> 2017 9:00 A.M. – 3:00 P.M.

Weather: Slightly chilly

Promotional Items Given out: Guaranteed Ride Home bags, reflectors

Promotional Literature: New, Spanish-translated Commuter Crew brochures, RTA bus route brochures

Number of People at Event: 1,000

Number of People Who Interacted with Table: 200

Number of Promotional Items Given out: 200 (rough estimate)

Number of People Interested in Guaranteed Ride Home: 30 (estimate)

Questions and Comments by Visitors: “The bus doesn’t go to its stop at the Total Health Care stop” • Some people couldn’t believe Guaranteed Ride Home was completely free.

16.) Homeless Resource Day - Saturday, October 28<sup>th</sup> 2017 10:00 A.M. – 3:00 P.M.

Weather: Slightly warm and sunny

Promotional Items Given out: Commuter Crew Hand Sanitizers, CMRT stuff (now CME)

Promotional Literature: New Commuter Crew brochures, RTA bus route brochures, other CMRT stuff

Number of People at Event: 350 (in my room throughout the day)

Number of People Who Interacted with Table: 85

Number of Promotional Items Given out: 45 (including CMRT’s things)

Number of People Interested in Rideshare: 8

Questions and Comments by Visitors: “Where are the free bus tokens?” • Someone expected the Office of Transportation to be able to help them obtain a vehicle



## **APPENDIX E- LAP/LEP PLAN**

### **ANNE ARUNDEL COUNTY**

## **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 Anne Arundel County is based on FTA guidelines.

As required, Anne Arundel County developed a written LAP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Anne Arundel County 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 (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 Anne Arundel County's service area. The agency's service area includes a total of *18,567 and/or 3.57%* persons with Limited English Proficiency



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(those persons who indicated that they spoke English “not well,” and “not at all” in the 2011-2015 ACS Census).

Information from the 2011-2015 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	[9,852]	[1.89%]
• Other Indo-European languages	[83]	[0.02%]
• Asian and Pacific Island languages	[5,347]	[1.03%]
• All Other languages	[3,285]	[0.63%]

*[Note: if any of these categories represents over 5% or 1,000 persons whichever is less, you should explore the individual languages in the category to determine whether any specific language meets this threshold]*

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**

Anne Arundel County 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;
- Contact with transit station managers;
- Calls to Anne Arundel County customer service telephone line;
- Visits to the agency’s headquarters;
- Access to the agency’s website;
- Attendance at community meetings or public hearings hosted by Anne Arundel County
- Contact with the agency’s ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

Anne Arundel County has collected this information from the 2017 Transit Development Plan. Riders could fill out the survey online from November 1 - December 6, 2016. In total, 1,243 valid surveys were returned and analyzed. A copy of the onboard rider survey instrument is provided in Appendix L. Of the 1,243 valid surveys collected, 95.9 percent were in English, 3.9 percent were

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in Spanish, and 0.2 percent were in Korean. The information does represent the regional survey geography, however 20 percent are specific to Anne Arundel County routes.

However after reviewing the relevant benefits/services, and information provided by the agency/ we are now working to improve data collection for 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 contract operator customer service telephone line;
- Access to the contract operator and Anne Arundel County's website;
- Attendance at community meetings or public hearings hosted by Anne Arundel County and contract operator
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility/ making reservations/ and communicating with drivers).

Anne Arundel 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 identifies their language and keeps records on those contacts to accurately assess the frequency and success of the contact.

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.

To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)

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

To supplement the Census, education, and labor department data, Anne Arundel County conducted community outreach to the following organizations that work with LEP populations.

Office of the County Executive created the Office of Immigrant & Multicultural Affairs (ICMA) cultivates a strong networking with more than 20 Hispanic churches throughout the county, under the umbrella of the Hispanic Ministry Network.

Anne Arundel County Public Schools have developed a very effective communication between the school and their families thanks to the International Students Office and the bilingual interpreters/liaisons in Spanish and Korean languages.

Anne Arundel County Department of Health provides a Spanish Line (410-222- 4479), a Spanish county website ([www.aasalud.org](http://www.aasalud.org)) with most valuable health information to be in compliance with

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Spanish speaking LEP individuals, a full time Hispanic/Latino liaison, and English-Spanish interpreters who facilitate equal access to services.

The Anne Arundel County Public Library (AACPL) expands life's possibilities by sharing resources for knowledge, entertainment and community engagement. They provide discovery tools and innovative spaces to expand minds and create learning opportunities from early childhood through adulthood.

Anne Arundel County Public Library Latino Outreach (ALO) aims to promote library services to the Latino community, highlight Latino culture and celebrate our county's diversity.

In recent years, the population of the Latino community in Anne Arundel County has increased considerably. As a result, there is a need for a greater understanding of the Latino experience in America and in our county.

Currently, the Library is reaching out to the Latino community by offering Bilingual programs and working in collaboration with bilingual facilitators in the county public schools and other local institutions. As they begin to reach this community, many more Latinos are becoming Library users. The library is a wonderful resource to reach out to LEP individuals trying to access information.

IMCA works in collaboration with non-profit organizations serving immigrant communities and co-sponsors programs and activities related to Hispanic Heritage Month, where hundreds of members of the Hispanic/Latino community gather to celebrate their ethnicity and heritage. This office holds outreach meetings with agencies/ organizations serving LEP populations as well.

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

Based on past experience serving and communicating with LEP persons and interviews with community agencies, *[as well as questionnaires or direct consultations with LEP persons (if applicable, e.g. through focus groups or individual interviews facilitated/interpreted by a community agency)]*, we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

Anne Arundel County and its contract operator provide service and fare media outlet information on a regularly. Anne Arundel County also provides various marketing and public display efforts with various county community partners. Anne Arundel County has gained valuable experience serving and communicating with LEP persons and providing interviews with community agencies, as well as questionnaires or direct consultations with LEP persons (through focus groups or individual interviews facilitated/interpreted by a community agency).

The following are the most critical services provided by Anne Arundel County for all customers/ including LEP persons.

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- Public transit services/ including reduced fare application process
- ADA paratransit services, including the eligibility certification process

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

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services, including reduced fare application process
- 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**

The IMCA whose full-time officer is a native Spanish-speaker. This office is charged two ways: a) connecting the growing immigrant population to services and programs to ensure a smooth transition and equal access to support the success of immigrants and diverse communities, and b), advises and collaborates with other County agencies in providing guidance on translation, interpretation, and outreach services for LEP persons seeking meaningful access to department's information, programs, activities and services.

This office provides a Spanish-language option on its telephone service (410-222-1879) and a county website in Spanish ([www.aacounty.org/espanol](http://www.aacounty.org/espanol)), posting press releases, notices, and up-to-date information pertaining to this community.

#### **Costs**

The following language assistance measures are currently being provided by Anne Arundel County or the contract operator:

- Bilingual staff (cost is low as a part of the overall operation)
- Interpreters and services by contractor at approximately \$95 per hour
- American Sign language interpreters at approximately \$95 per hour
- Website with Google Translate software compatibility (website development cost)

#### **Resources**

Anne Arundel County and the contract operator have bilingual staff that are employed at this time.

In addition, we have a budget for interpreter and translation services. Given the very high rate of growth in the LEP population in this service are, and the wide variety of languages represented, Anne Arundel County anticipates that these activities and costs will need to increase slightly each year.

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Anne Arundel County can identify in-kind assistance, that may be available through community organizations/other county departments, or other transit agencies who may be able to partner with language assistance services.

### **Feasible and Appropriate Language Assistance Measures**

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

- Assistance from bilingual staff members
- Translation services when needed via commercial translation providers
- Translation of vital documents on website via web-based translation program

### **LEP Implementation Plan**

Through the four-factor analysis, Anne Arundel County has determined that the following types of language assistance are most needed and feasible:

- Translation of vital documents into Spanish. These documents include:
  - System Map and Ride Guide
  - Application for reduced fare
  - All printed materials on ADA Paratransit, including brochure, eligibility application package, and passenger policies and procedures
  - Emergency preparedness brochure
- Attempt to hire bilingual staff with competency in spoken and written (Spanish, Vietnamese, etc. as appropriate for your service area).
- Language Line Translation Services for telephone contacts.
- In-person translation for ADA eligibility assessments.

Anne Arundel County staff and contractors that come into contact with LEP persons can access language services by offering the individual a language identification flashcard. Anne Arundel County will have a supply of translated documents on hand; and will transfer a call to bilingual staff as appropriate. All staff will be provided with a list of available language assistance services and additional information and referral resources with community organizations that can assist LEP persons. This list will be updated at least annually. Staff who answer calls from the public will respond to LEP customers to discuss the availability of bilingual staff for trip scheduling procedures as well.

**Tools for Front-Line Staff:** In addition to training, some simple tools can make communication easier for both front-line staff and their LEP clients:

**Tear-sheets:** Operators are provided with pads of tear-off sheets that will inform the reader in multiple languages of the availability of translation services by phone. This allows operators assisting an LEP client to have something helpful to give the client. The client should be able to

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read at least one of the languages on the sheet/ and then call the number on the sheet to receive further translation services.

**Translators:** Operators will be provided with visual translators, cards with universally recognized pictures and symbols that could be pointed to by either the operator or the client in case of a language barrier. These for LEP clients but also for those who might be deaf, mute, or choose not to speak due to other physical or psychological conditions.

**Identification of Bilingual Staff:** Bilingual staff are identified and a roster maintained so that they may be called upon to assist with interpretation when available.

### **Staff Training**

As noted previously, all Anne Arundel County 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:

- Web links to translations of vital documents in other languages.
- Signs posted on our vehicles and in our customer service and administrative offices.
- Automated telephone menu system in the most common languages encountered.
- Outreach efforts to community organizations/ schools, and religious organizations.
- Including the language translation line on all materials.

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- By sending translated news releases and public service announcements about the availability of LAP.
- Providing information to newspapers and broadcast media that target local LEP communities.
- Providing LEP persons in all community outreach efforts related to service and fare changes.

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

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/ will solicit feedback on the effectiveness of language assistance provided and unmet needs.

As a component of outreach Anne Arundel County will work to conduct periodic internal meetings with staff who assist LEP persons, and review updated Census data or formal studies to determine the adequacy and quality of the language assistance provided, and any needed changes to the LAP program or LEP needs.

Based on the feedback received from community members and agency employees, Anne Arundel 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 Anne Arundel County will attempt to identify the most cost-effective approaches.

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

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### **Language Access Complaint Procedure**

You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 180 calendar days of the alleged denial.

Any individual may exercise his or her right to file a complaint with Anne Arundel County 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 Title VI/LEP Complaint Procedures. All LEP complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA. If you need additional information or feel you are being denied participation in or being denied benefits of the transit services provided by Anne Arundel County, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact:

*Alanna W. Dennis, Anne Arundel County's Human Relations Compliance Officer (EEO/Title VI)  
44 Calvert Street, Suite 330,  
Annapolis, Maryland 21401  
Email: ExDenn45@aacounty.org*

### ***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, Anne Arundel' County will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic *[surveys, focus groups, community meetings, 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, Anne Arundel County 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 Anne Arundel County will attempt to identify the most cost-effective approaches.

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

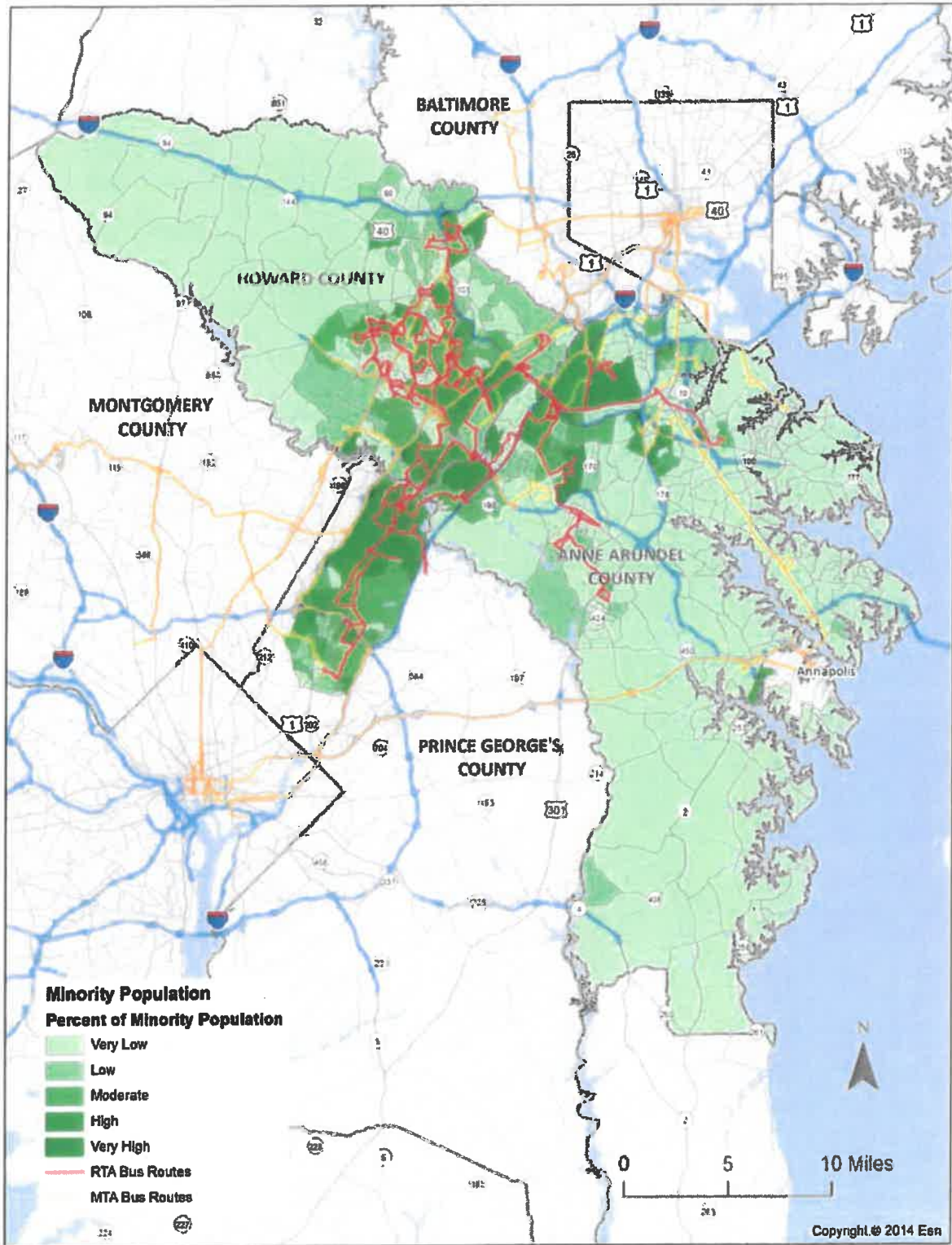








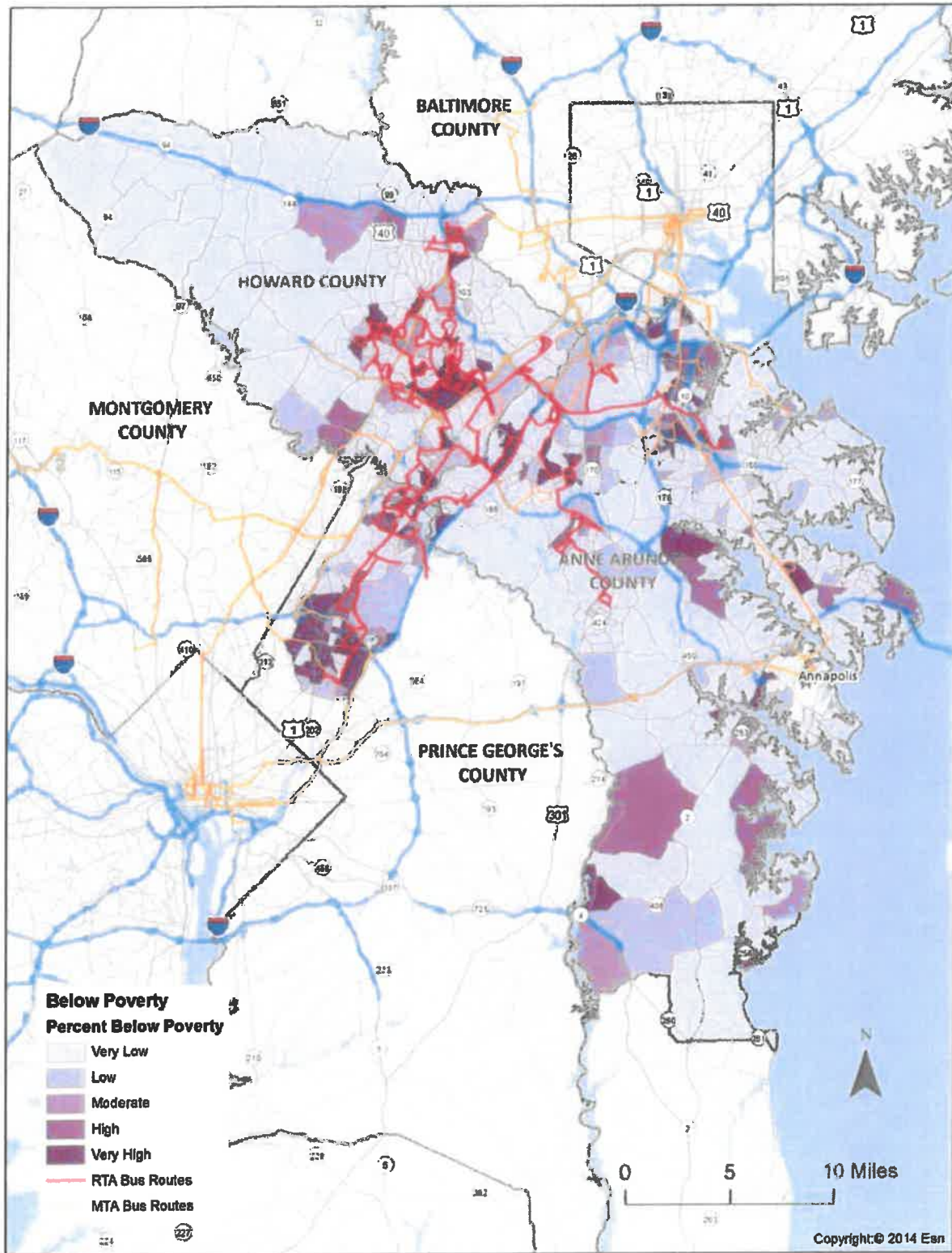
**APPENDIX G- MINORITY MAP**



**\*Low to "Very High" are all above 32% minority Average for Anne Arundel County Routes is 48%**

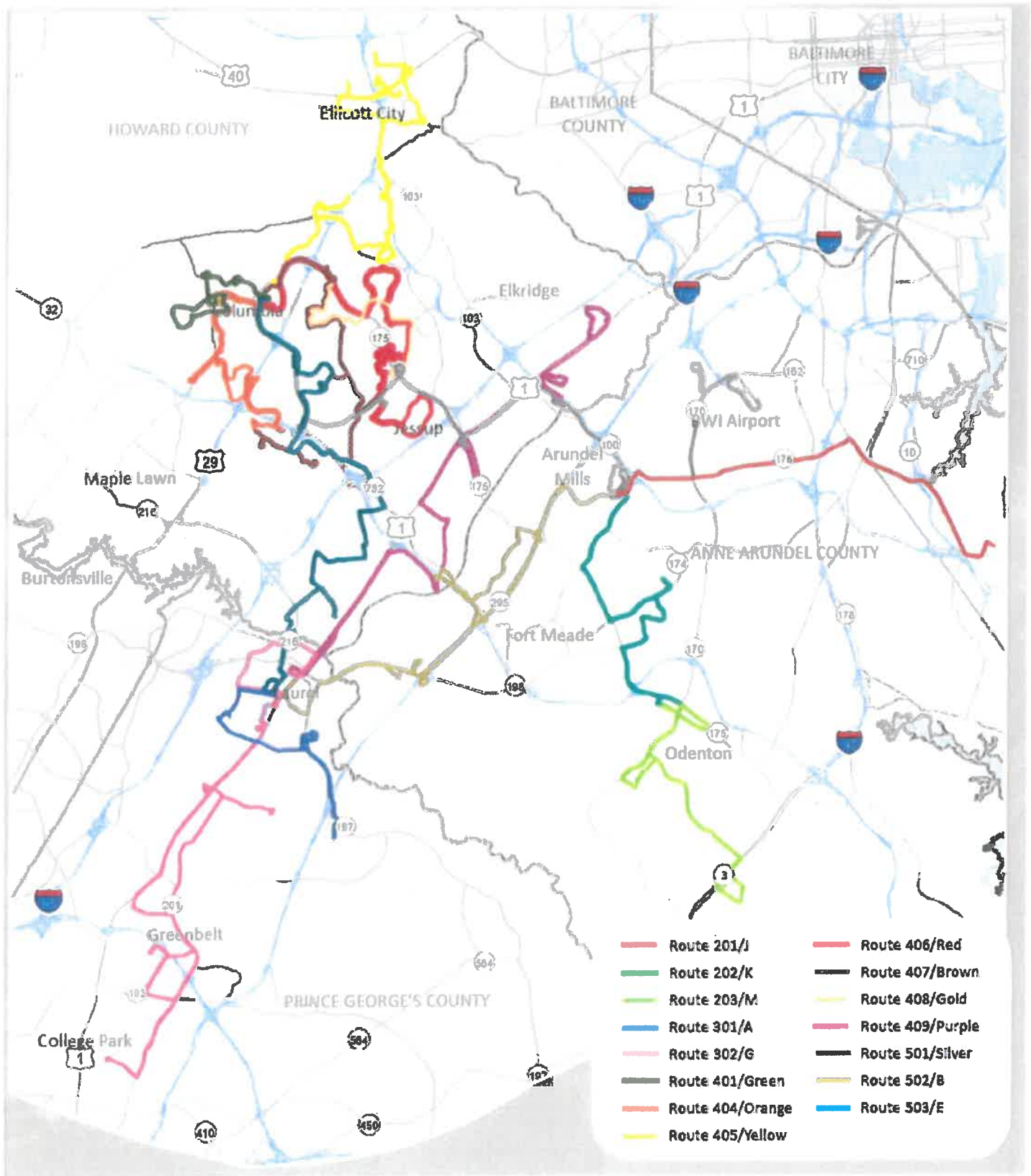


**APPENDIX I- POVERTY MAP**





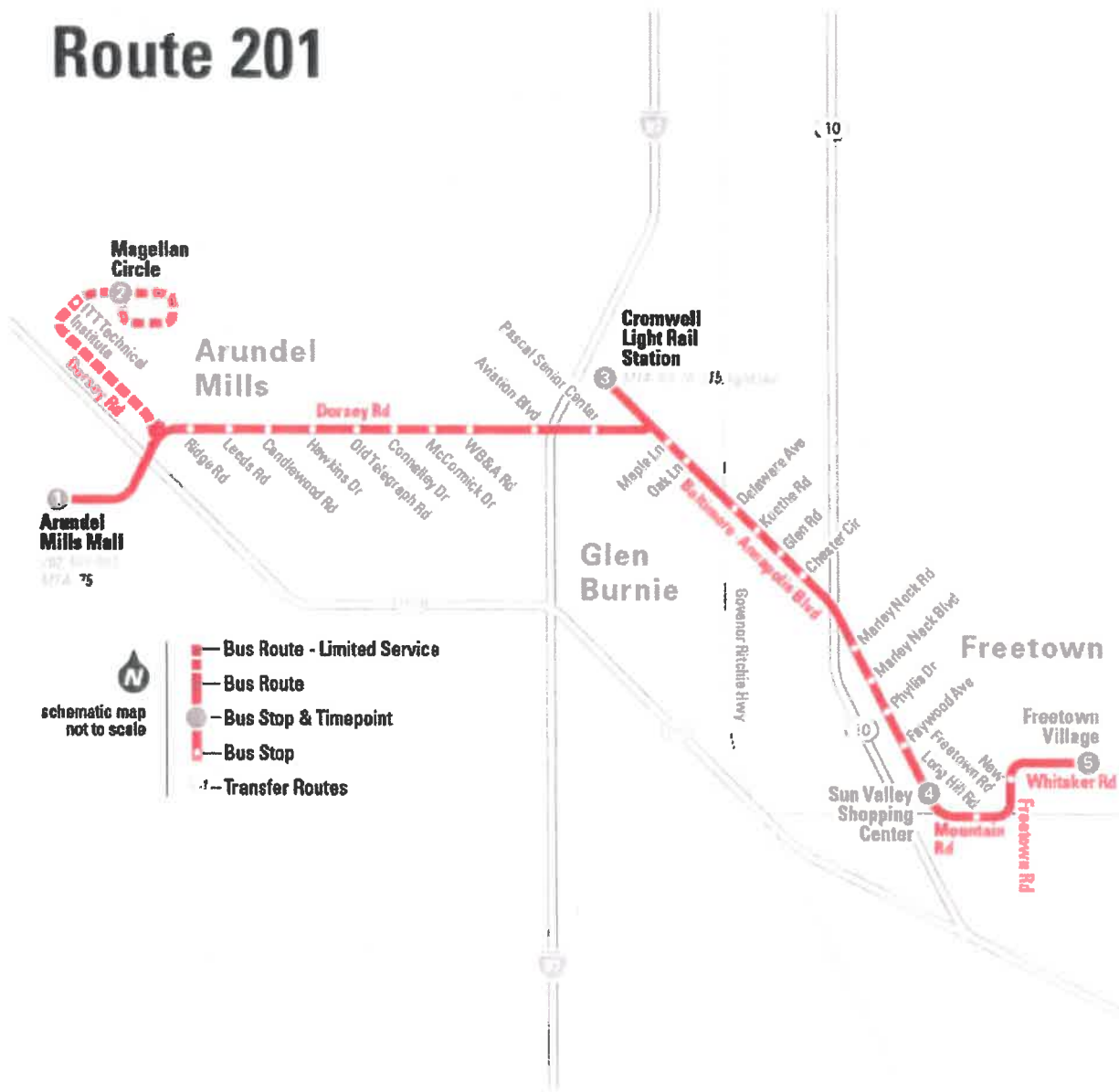
# APPENDIX J- TRANSIT SYSTEM MAP





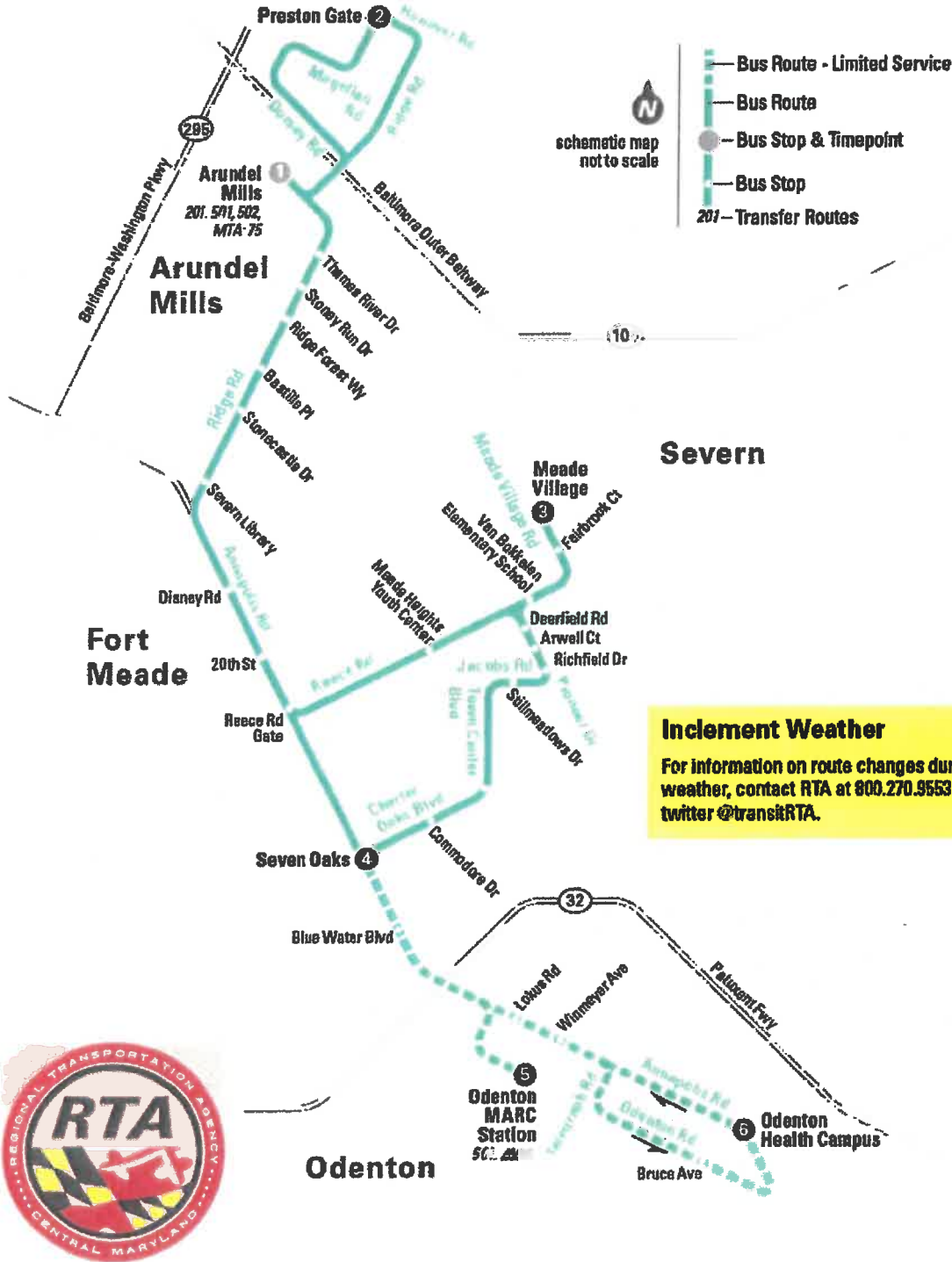
**APPENDIX J- TRANSIT SYSTEM MAP**

# Route 201



APPENDIX J- TRANSIT SYSTEM MAP

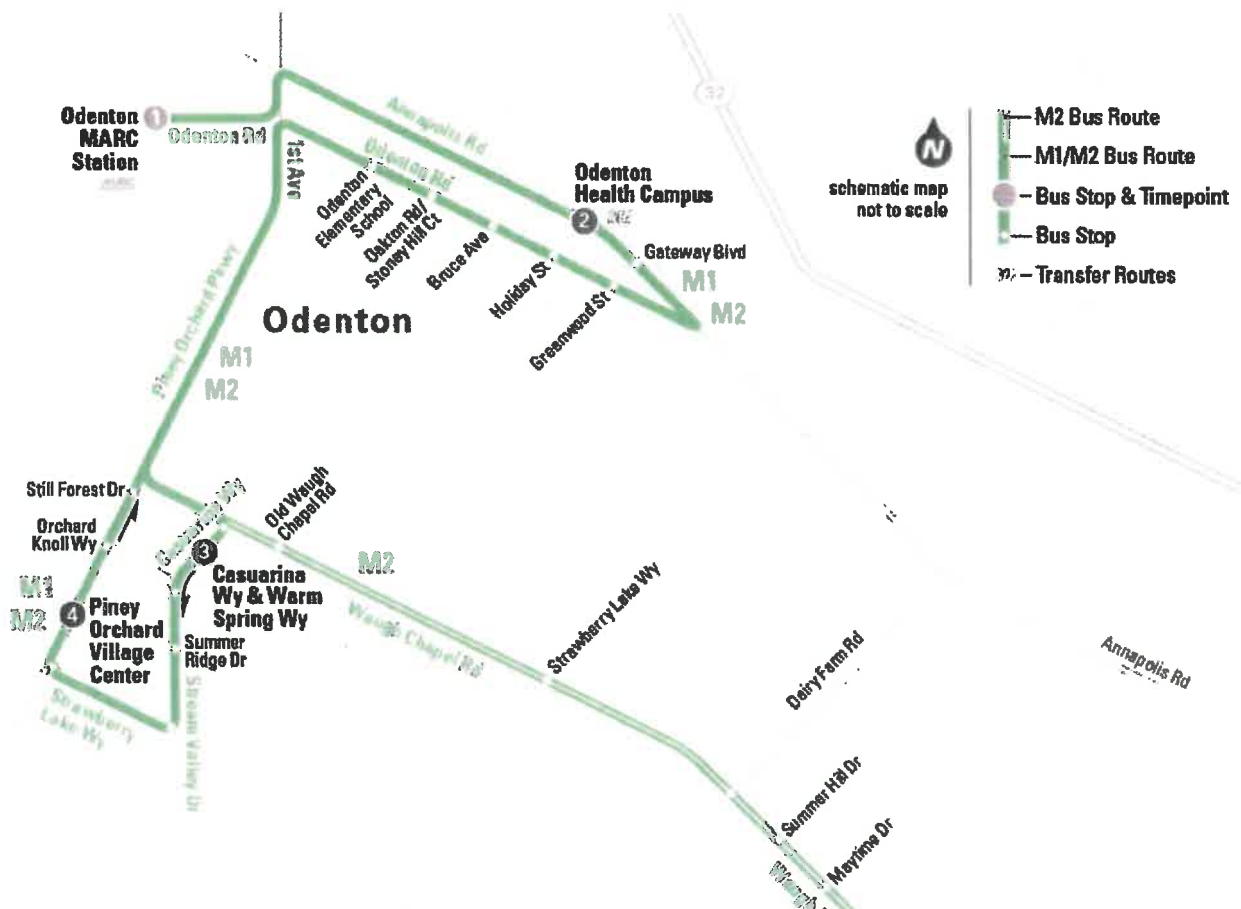
# Route 202



**Inclement Weather**  
 For information on route changes during inclement weather, contact RTA at 800.270.9553 or follow us on twitter @transRTA.



# APPENDIX J- TRANSIT SYSTEM MAP



## Route 203/M

**Inclement Weather**  
 For information on route changes during inclement weather, contact RTA at 800.270.9553 or listen for notifications on local radio and television stations.



**Guaranteed Ride Home**  
 When you take RTA to work and you have an emergency, you are eligible for the Guaranteed Ride Home Program through Commuter Connections. To register, call 1-800-745-RIDE (7433).



**APPENDIX K- TRANSIT SERVICE PROFILE**

Route	Service Area (County)	Service Characteristics			
		Day	Span	Peak Headways	Off-Peak Headways
201/J: Arundel Mills Mall – Freetown Village	Anne Arundel County	Weekday	6:30am – 11:55pm	45 min.	90 min.
		Saturday	8:30am – 11:00pm	-	90 min.
		Sunday	10:30am – 7:20pm	-	120 min.
202/K: Arundel Mills Mall – Odenton MARC Station	Anne Arundel County	Weekday	6:15am – 11:10pm	45 min.	120 min.
		Saturday	8:45am – 11:00pm	-	120 min.
		Sunday	9:00am – 9:50pm	-	120 min.
203/M1: Odenton MARC Station – Piney Orchard	Anne Arundel County	Weekday	7:50am – 6:50pm	30 min.	-
203/M2: Odenton MARC Station – Crofton Village	Anne Arundel County	Weekday	7:15am – 7:25pm	60 min.	-

**DEMOGRAPHICS FOR ROUTE PROFILES**

Route	201/J	Route	202/K	Route	203/M
Population	37756	Population	45677	Population	37333
Poverty	7.60%	Poverty	7.9%	Poverty	5.9%
Limited English	2.90%	Limited English	3.0%	Limited English	1.1%
Minority	35.80%	Minority	58.3%	Minority	49.9%
Senior 65+	14.40%	Senior 65+	7.5%	Senior 65+	8.2%
Disabilities	14.70%	Disabilities	8.2%	Disabilities	7.8%
Household no Vehicles	7.20%	Household no Vehicles	4.8%	Household no Vehicles	3.5%

**APPENDIX K- TRANSIT SERVICE PROFILE**

**PERFORMANCE STATISTICS FY 16**

Route	Unlinked Passenger Trips <sup>(1)</sup>	Vehicle Service Hours <sup>(2)</sup>	Operating Cost <sup>(3)</sup>	Farebox Revenue <sup>(4)</sup>	Fare Revenue per Passenger <sup>(5)</sup>	Farebox Recovery Ratio	Local Recovery Ratio <sup>(6)</sup>	Passengers per Service Hour <sup>(8)</sup>	Cost per Trip <sup>(9)</sup>
201/J	77,556	8,092	\$610,380	\$105,017	\$1.35	17%	68.2%	9.58	\$7.87
202/K	93,254	9,109	\$687,092	\$126,273	\$1.35	18%	68.2%	10.24	\$7.37
203/M	8,938	3,514	\$265,061	\$12,103	\$1.35	5%	68.1%	2.54	\$29.66

APPENDIX L- VEHICLE PULLOUT SHEETS

created by: Andrew Johnson										Wednesday, November 22, 2017					MANAGER APPROVAL: _____		
ROW #	Start Time	End Time	Start Date	End Date	Start Time	End Time	Area	Vehicle	Operator	Operator Initials	Operator Phone	Bus #	Vir	Notes			
22	4:45				12:00	14:30		EUBO	M Bolden	MB				Yellow A			
22	5:00				13:30	15:30		EUBO	E Miller	EM				409 B/A			
65	5:30				12:30	14:24		EUBO	O Henriquez	OH				KIA			
26	5:30				12:30	13:58		EUBO	E McLoughlin	EM							
44	5:30				11:30	13:20		EUBO	E Tillman	ET				B2A			
63	5:30				12:00			EUBO	W Greenstreet	WG				100-RR 2A			
78	4:48	5:03	5:30	14:14	14:29	14:34	4452	Armed B2a	9:46	SILVER 1a	8	F Thomas	FT	8903	✓		
1	4:55	5:10	5:30	14:45	15:00	15:06	15:05	C-Mat	10:10	EIA 1a	8	G Charles	GC	7000 Copper, 2	9531	✓	Awarded
17	4:50	5:05	5:31	13:53	14:25	14:30	14:34	C-Mat	9:40	BROWN / RED 1a	8	H Tifrene	HT		9520	✓	
63	5:30	5:15	5:35	13:51	14:15	14:20	14:24	C-Mat	9:32	RED / BROWN 1a	8	R Blanks	RB		9521/9517	✓	
13	5:30	5:15	5:40	13:52	14:15	14:20	14:32	C-Mat	9:20	GREEN 1a	8	W Elira	WE		9576	✓	
72	5:10	5:33	5:53	13:14	13:29	13:34	14:00	Mid Food Center	8:16	GOLD 1a	2	M Lopez-Carino	ML		204		
27	5:20	5:35	6:00	13:54	14:15	14:20	14:30	C-Mat	9:00	YELLOW 1a (A)	8	OPEN	MB	Baldwin	9538	✓	
28	5:20	5:35	6:00	13:45	14:10	14:15	14:24	C-Mat	8:55	EIA 4a	8	L Douglas	LD		9530	✓	
81	5:20	5:35	6:00	14:40	15:15	15:20		C-Mat	10:00	SILVER 2a	8	B Chadha	BC		8911		
83	5:20	5:35	5:40	13:15	13:29	13:34	13:20	Mid Food Center	8:14	409B 1a	2	D Graves	DG	Milkr, E	201	✓	
39	5:20	5:38	5:43	9:30	9:35	9:40	9:40	GAR	4:17	504 2a	2	N West	NW		222	✓	
43	5:25	5:40	6:00	13:50	14:10	14:15	14:20	Laund Mat	8:50	G 2a	8	C Exama	CE		9551	✓	
32	5:25	5:40	6:00	13:41	14:15	14:20	14:40	C-Mat	8:55	ORANGE 1a	8	A Doud	AD		9540	✓	
6	5:25	5:40	6:00	12:53	13:15	13:20	13:25	C-Mat	7:55	BROWN / RED 2a	8	V Meshe	VM		9505	✓	
64	5:25	5:40	6:00	12:51	13:20	13:25	13:20	Laund Mat	8:00	B 2a	8	OPEN	ET	William, E	9544	✓	
67	5:25	5:40	6:00	14:32	15:07	15:12		Armed B2a	9:47	B 1a	8	D Gigeous	DG		8908	✓	
34	5:25	5:40	6:00	9:55	10:10	10:15	10:2	GAR	4:50	PURPLE 2a	8	V Johnson	VJ		1701	✓	
62	5:25	5:40	6:06	12:53	13:21	13:26		C-Mat	8:01	YELLOW 2a (B)	8	J Alfama	JA		7542	✓	
21	5:34	5:49	6:09	12:41	13:20	13:25	13:25	C-Mat	7:51	ORANGE 2a	8	S McDowell	SM		7541	✓	
57	5:35	5:50	6:10	14:03	14:18	14:23	14:24	Snow Sports	8:48	RED / BROWN 2a	8	R Jackson	RJ	HACKWORTH	9534	✓	
16	5:40	5:55	6:15	15:09	15:24	15:29		GAR	8:49	K 1a	8	O Ahmed	OA	GARRATT	9711	✓	
AM Dispatch:		1:2		PM Dispatch:													



# APPENDIX L- VEHICLE PULLOUT SHEETS

created by: Andrew Johnson										Wednesday, November 22, 2017		MANAGER APPROVAL: _____			
LINE	START	END	START	END	START	END	START	END	START	END	OPERATOR	REPLACEMENT NAME	BUS #	VIR	REMARKS
10	12:50	12:55	13:30	22:17	22:38	22:43			GAR	10:02	GOLD 1b	D Mendoza	PARKLESS T 204		
9	13:30	13:05	13:25	21:15	21:30	21:35			GAR	8:35	EIA 2b	R Peterson	M. Robinson 9573		Delivered 2/0 11:50
12	13:20	13:25	22:40	21:15	21:30	21:35			GAR	8:16	G 2b	J Jatachira	9551		
74	13:10	13:15	13:40	21:28	21:41	21:46			GAR	8:26	RED 2b	T Abdul-Baqi	203		
11	13:25	13:40	14:30	21:55	22:10	22:15			GAR	8:50	PURPLE 2b	G Moore	9544		
38	13:30	13:35	14:00	22:27	22:42	22:47			GAR	9:17	ORANGE 1b	C McLoughlin	9590		
25	13:30	13:35	14:00	22:11	22:23	22:28			GAR	8:58	YELLOW 1b	G Woodard	9538		
41	13:30	13:35	14:00	23:00	23:30	23:35			GAR	10:05	GREEN 1b	OPEN	9576		
37	13:30	13:35	14:00	23:19	23:34	23:39			GAR	10:09	BROWNRED 1b	OPEN	9520		
69	13:30	13:35	14:00	22:19	22:38	22:44			GAR	9:14	REDBROWN 1b	E Jones	9507		
50	13:30	13:35	14:00	19:15	19:30	19:35			GAR	8:05	EIA 4b	K Tharpe	9530		
42	13:35	13:40	14:03	23:27	23:42	23:47			GAR	10:12	REDBROWN 2b	O Ogunlana (TAM)	9534		
29	13:38	13:40	14:35	18:35	19:10	19:15			GAR	5:40	PURPLE 1b	L Ridley	9549		
47	13:50	13:55	14:18	22:53	23:13	23:18			GAR	9:28	SILVER 1b	F Handy	890		
69	13:52	14:07	14:30	18:22	18:42	18:47			COL. HALL	4:55	GREEN 2b	J Bath	1703		
71	13:55	14:10	14:30	18:54	19:09	19:14			GAR	5:19	K 2b	J McCoy	9710		
34	13:55	14:10	14:30	18:25	18:34	18:39			GAR	4:44	GOLD 2b	V Johnson	1702		
76	13:59	14:04	14:40	21:49	22:04	22:09			GAR	8:10	RED 4b	D Constantine	9553		
81	14:23	14:38	14:43	18:30	18:35	18:40			GAR	4:17	504 4b	F Mord	224		
25	14:30	14:35	15:00	22:53	23:13	23:18			GAR	8:48	SILVER 2b	A Barnaby	8561		
80	14:30	14:35	15:00	22:15	20:30	20:35			GAR	8:35	EIA 1b	L Garrell	9571		
86	14:35	14:40	15:00	22:48	23:03	23:08			GAR	8:33	B 1b	G Metelkus	8908		
36	14:43	15:08	15:13	18:06	18:26	18:31			GAR	3:50	504 1b	C Young	221		
22	14:50	14:55	15:15	22:11	23:26	23:31			GAR	8:41	K 1b	W Armstrong	9711		
99	15:00	15:15	15:30	18:30	18:45	18:50			GAR	3:19	504 2b	N West	222		
52	15:20	15:25	15:45	23:55	0:10	0:15			GAR	8:55	J 1b	W Capeheart	9546		
80	15:23	15:38	15:43	18:50	19:08	19:13			GAR	3:50	504 3b	D Moulden	223		
8	15:55	16:10	16:30	19:51	20:06	20:11			GAR	4:15	J 2b	N Mitchell	202		
AM Dispatch: <i>Pa2</i>							PM Dispatch:								



**APPENDIX L- VEHICLE PULLOUT SHEETS**

assigned by <i>Andres Johnson</i>												Wednesday, November 22, 2017		MANAGER APPROVAL: _____						
LINE #	Actual Report Time	REPORT TIME	Cap. Name	Begin Time	End Time	Full h.	Stop #	Actual Type RT	Vehicle Type	DRIVE	ROUTE	LR	OPERATOR	OPERATOR INITIALS	REPLACEMENT NAME	REPLACEMENT PHONE #	BUS #	VIR	NOTE-REUSE OFFICIALS CHECK	
35	✓	6:43	5:50	6:10	6:50	10:00	10:13	102	COL. BALL	4:30	9M 1a	L	C Young	UY			221	✓		
41	✓	6:50	6:05	6:25	12:45	13:05	12:10	102	Learn' Mat	7:20	EA 3a	R	K Eira	KE	Johnson	9533		✓	marked	
4	✓	6:50	6:05	6:25	12:50	13:10	12:15	102	Learn' Mat	7:25	G 1a	R	E Thomas	ET	6.11.11/11/11.6	7008	✓	90 1791 11/24/17		
59	✓	6:50	6:05	6:30	10:22	10:42	10:47	1047	GM	6:57	GREEN 2a	R	J Bath	JB		170	✓			
77	✓	6:50	6:05	6:30	13:29	13:44	13:49	1406	Slow Spare	7:59	RED 3a	L	J Biosaine	JB		203	✓			
80	✓	6:50	6:00	6:13	10:00	10:05	10:10	1010	COL. BALL	6:17	9M 3a	R	D Moudten	DM		223	✓			
3	✓	6:55	6:10	6:30	13:15	13:30	13:35	1416	Learn' Mat	7:40	EA 2a	R	T Parker	TP		9543	✓			
8	✓	6:55	6:10	6:30	10:20	10:35	10:40	1091	GM	6:45	J 2a	R	M Mitchell	MM		202	✓			
29	✓	6:55	6:10	6:30	10:17	10:30	10:35	1040	GM	6:40	GOLD 2a	R	L Ridley	LR		1702	✓			
2	✓	6:10	6:25	6:45	10:35	10:50	10:55		Assmt. Mat	9:45	J 1a	R	D McHair	DM		9546	✓			
61	✓	6:23	6:30	6:43	10:30	10:35	10:40	1040	GM	6:17	9M 4a	L	F Milord	FM		224	✓			
6	✓	6:25	6:40	7:00	13:50	14:10	14:15	1434	GM	7:50	PURPLE 1a	R	H Wachun	HW		9549	✓			
31	✓	6:25	6:40	7:00	11:24	11:30	11:34	1205	GM	5:19	K 2a	R	B Foster-Jones	BF		9710	✓			
76	✓	6:30	7:05	7:30	14:20	14:40	14:54	1512	Slow Spare	8:04	RED 4a	R	R Doreness	RD		9552	✓			
90		12:20	or assigned			18:30				7:00	EX 8D		P Pierre						GREEN 1B	
92		12:20	or assigned			18:30				7:00	EX 8D		OPEN							
58	✓	9:17				20:30				8:00	EX 8D		E Gary	KG					EA 2B	
56		12:30				18:30				6:00	EX 8D		T Fyfe-Hartless						Gold 1B	
65		12:25	or assigned			18:00				4:35	EX 8D		N Bussey							
19		12:30	12:35	13:00	20:45	21:00	21:05		GM	6:35	EA 3a		R Murray			9533				
45		12:30	12:35	13:10	21:53	22:08	22:13		GM	9:43	BROWNED 2b		X Harris			9545				
79		12:30	12:35	13:00	17:52	18:17	18:22		GM	6:52	ORANGE 2b		J Ensey			9541				
88		12:30	12:35	13:00	18:25	18:45	18:50		GM	6:20	YELLOW 2b		R Carter			9542				
46		12:35	12:40	13:00	20:15	20:30	20:35		GM	6:00	G 1b		D Bell			7008				
66		12:35	12:40	13:00	22:45	23:00	23:05		GM	10:20	B 2b		C Hoyle			9544				
54		12:50	12:55	13:15	17:57	18:07	18:12		GM	6:22	4008 1b		S Green			211				
All Dispatch:		12		PM Dispatch:																