

BALTIMORE METROPOLITAN PLANNING ORGANIZATION

**BALTIMORE REGIONAL TRANSPORTATION BOARD
RESOLUTION #19-23**

**APPROVAL OF THE 2019 LIMITED ENGLISH PROFICIENCY PLAN FOR THE BALTIMORE
METROPOLITAN PLANNING ORGANIZATION**

WHEREAS, the Baltimore Regional Transportation Board is the designated Metropolitan Planning Organization (MPO) for the Baltimore region, encompassing the Baltimore Urbanized Area, and includes official representatives of the cities of Annapolis and Baltimore, the counties of Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's, as well as representatives of the Maryland Department of Transportation, the Maryland Department of the Environment, the Maryland Department of Planning, the Maryland Transit Administration, and Harford Transit; and

WHEREAS, the Baltimore Regional Transportation Board, as the Metropolitan Planning Organization for the Baltimore region, has a responsibility under the provisions of the Fixing America's Surface Transportation Act (FAST) for developing and carrying out a continuing, cooperative, and comprehensive transportation planning process for the metropolitan area; and

WHEREAS, Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance, and Presidential Executive Order 13166 requires recipients of federal funds to assess, monitor, and address the needs of Limited English Proficiency (LEP) individuals seeking assistance; and

WHEREAS, the Baltimore Regional Transportation Board, in accordance with "US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons", has conducted a four-factor analysis (Attachment 1) in determining the "reasonable steps" the Board must take to ensure meaningful access to information and services it provides; and

NOW, THEREFORE, BE IT RESOLVED that the Baltimore Regional Transportation Board, after all comments were duly considered, approves the 2019 Limited English Proficiency Plan for the Baltimore region.

I HEREBY CERTIFY that the Baltimore Regional Transportation Board, as the Metropolitan Planning Organization for the Baltimore region, approved the aforementioned resolution at its May 28, 2019 meeting.

5-28-2019

Date



Valorie LaCour, Chair
Baltimore Regional Transportation Board

Limited English Proficiency Plan Fact Sheet

Background: Limited English Proficiency (LEP) is a term used to describe individuals whose primary language is not English and are not proficient in the English language.

Federal law: Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency, and (Presidential) Executive Order 13166.

Determining the Need: As a recipient of federal funding, the Baltimore Regional Transportation Board must take reasonable steps to ensure meaningful access to the information and services it provides. In determining "reasonable steps" there are four factors to be considered:

1. The number and proportion of LEP persons in the eligible service area;
2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

Response to Four-Factor Analysis: Based on the current low levels of residents with LEP in the Baltimore region and their limited interaction with the BRTB, full translation of all BRTB Plans and Programs is not required at this time. However, in order to engage the diverse population in the region, the BRTB is committed to providing appropriate language assistance to the LEP population. Key actions are outlined below.

- An Executive Summary will be made available in (Latin American) Spanish for the long-range transportation plan (draft and final) and short-range transportation program (draft & final)
- The full Public Participation Plan, Limited English Proficiency Plan, Title VI Policy and Complaint Form, and the "About the BRTB" brochure.
- The BRTB will provide limited oral language services to LEP individuals upon request.
- A review of the data this plan is based on will be conducted at least every four years.
- As a recipient of federal financial assistance, the BRTB has adopted a Title VI complaint procedure.



Language Assistance Program and Limited English Proficiency Plan

May 28, 2019



Purpose Of This Plan

The purpose of this Language Assistance Program is to provide meaningful access to regional transportation planning information under the purview of the BRTB. Assistance is also available at events for individuals who are in need of language assistance.

This plan details how the BRTB assesses and addresses the needs of persons with Limited English Proficiency.

LIMITED ENGLISH PROFICIENCY

Limited English Proficiency (LEP) is a term used to describe individuals who do not speak English as their primary language, and who also have a limited ability to read, write or understand English.

As a recipient of federal funds, the BRTB is required to have a Limited English Proficiency (LEP) plan. As a recipient of US Department of Transportation (DOT) funds, the BRTB follows the DOT approach offered in the DOT publication, *A Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons*, to develop a plan to determine and meet the need for language assistance in transportation planning for the Baltimore region.

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EXECUTIVE SUMMARY

The Baltimore Regional Transportation Board (BRTB) is committed to ensuring meaningful access to its programs and activities by persons who are limited English proficient (LEP). A “four factor” analysis, developed by the federal government, is used to help determine how to ensure reasonable and meaningful access to BRTB activities, including:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity or service provided by the program to people’s lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

For the results of the analysis performed by the Baltimore Metropolitan Council (BMC) on behalf of the BRTB, refer to Section II, which discusses and describes the LEP population(s) which are likely to be served by BRTB programs. The BMC has Language Assistance services in place if requested.

BRTB policy states that translation services are available upon request for meetings that are open to the public, as well as for certain documents and publications.

In addition to posting this policy online, the BRTB includes the following language in its meeting announcements and agendas to notify the LEP population(s) of the availability of language assistance:

The Baltimore Regional Transportation Board operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws.

Appropriate services can be provided to qualified individuals with disabilities or those in need of language assistance who submit a request at least seven days prior to a meeting. Call 410-732-0500.

In major BRTB publications the above text is included to notify the LEP population(s) of the availability of alternative formats of the document.

The BRTB developed its policy to guide BMC staff and outline how the BRTB will provide certain services to accommodate people with special needs, including LEP. Staff having contact with the public will be trained regarding their obligations to provide meaningful access to information and services for LEP persons.

This plan is updated every four years. Refer to Section IV - Monitoring and Updating the Language Assistance Plan for additional information.

I. INTRODUCTION

About The Baltimore Regional Transportation Board

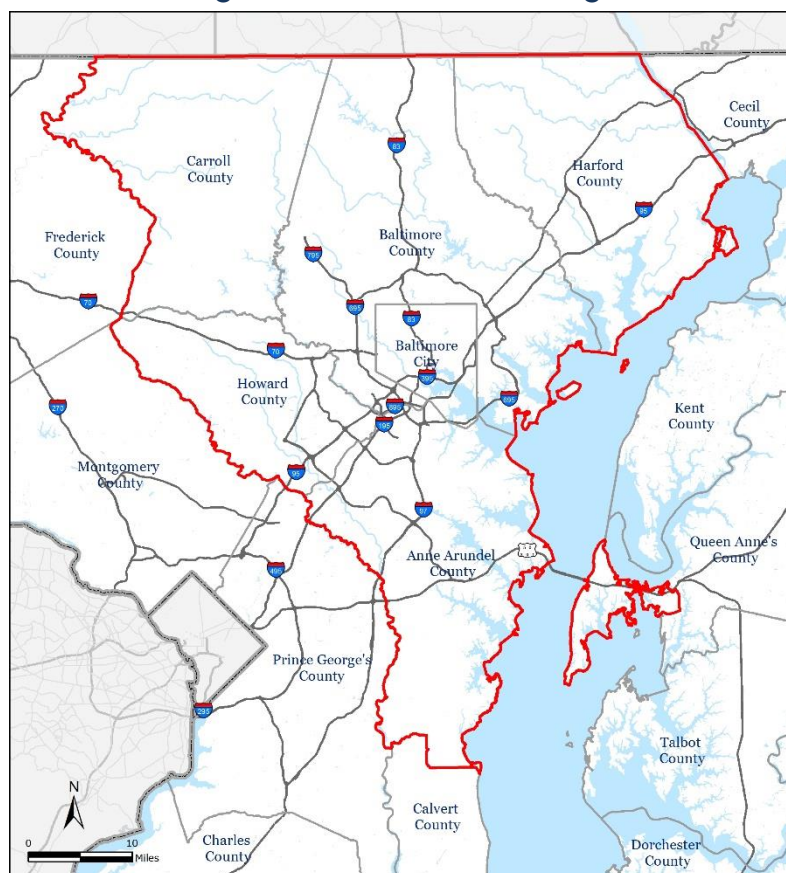
The Baltimore Regional Transportation Board (BRTB) is the Metropolitan Planning Organization (MPO) for the Baltimore region. The BRTB is responsible for making sure that any federal money spent on existing and future transportation projects and programs is based on a continuing, cooperative and comprehensive (3-C) planning process. All transportation projects and programs that receive federal funding in our region go through this planning process.

The BRTB provides program management of a work plan and budget called the Unified Planning Work Program (UPWP) that directs planning activities on an ongoing basis. Also, the BRTB provides policy direction and oversight in the development of the federally mandated long-range transportation plan which covers 20 years and is updated every 4 years; a short-range document known as the Transportation Improvement Program (TIP) which covers the next 4 years and is updated annually; as well as the associated Air Quality Conformity Determination.

The BRTB is a 13-member board representing:

- Anne Arundel County
 - Baltimore City
 - Baltimore County
 - Carroll County
 - City of Annapolis
 - Harford County
 - Howard County
 - Queen Anne's County
 - Maryland Department of the Environment *
 - Maryland Department of Planning *
 - Maryland Department of Transportation
 - Maryland Transit Administration *
 - Harford Transit **
- * Non-voting member
** Designated voting representative of public transportation providers

Figure 1: The BRTB Planning Area



In addition, the BRTB has a number of subcommittees and advisory groups that focus on specific areas, such as freight movement, bicycle and pedestrian access, traffic incident management, air quality, travel demand modeling, and more. All meetings of the BRTB and the subcommittees are open to the public.

Relationship of the BRTB to the Baltimore Metropolitan Council

The BRTB receives staff support through its host agency, the Baltimore Metropolitan Council (BMC). The BMC is a nonprofit organization that works collaboratively with the chief elected officials in the region to create initiatives to improve the quality of life and economic vitality. BMC connects the Baltimore region – how we travel, work and live – by identifying mutual interests and developing collaborative strategies, plans and programs. BMC is a resource for the region. BMC, as the region’s council of governments (COG,) hosts the federally designated metropolitan planning organization the Baltimore Regional Transportation Board (BRTB).

BMC’s Board of Directors includes:

- Anne Arundel County Executive
- Baltimore City Mayor
- Baltimore County Executive
- A Carroll County Commissioner
- Harford County Executive
- Howard County Executive
- A Queen Anne’s County Commissioner
- A Maryland State Senator
- A Maryland House Delegate
- A gubernatorial appointee

Commitment To Nondiscrimination

The Baltimore Metropolitan Council (BMC) on behalf of the Baltimore Regional Transportation Board (BRTB) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the BRTB.

For more information on the Baltimore Regional Transportation Board’s Title VI Program, and the procedures to file a Title VI complaint, call 410-732-0500; (TTY 800-735-2258), e-mail: titlevi@baltometro.org; or visit the Baltimore Metropolitan Council, 1500 Whetstone Way, Suite 300, Baltimore Maryland 21230. More information can be found on the Baltimore Metropolitan Council website <https://www.baltometro.org/non-discrimination>. If information is needed in another language, contact 410-732-0500.

Si se necesita información de Título VI en español, llame al 410-732-0500.

U.S. Department Of Transportation Guidance To Language Access

The U.S. Department of Transportation, Office of the Secretary, issued guidance to recipients of Federal transportation aid in 2001 as to the requirement to provide language access to limited English populations.

The guidance states that, "Title VI and its regulations require recipients to take reasonable steps to ensure 'meaningful' access to DOT recipients' programs and activities. The key to providing meaningful access to LEP persons is to ensure that recipients and LEP beneficiaries can communicate effectively and act appropriately based on that communication. Thus DOT recipients should take reasonable steps to ensure that LEP persons are given adequate information, and are able to participate effectively in recipient programs and activities, where appropriate."

This Language Assistance Plan was developed to demonstrate the commitment of the BRTB and BMC staff to ensure meaningful access, as described in the Executive Order and the U.S. DOT guidance, to all programs and activities by LEP persons.

II. DETERMINING REASONABLE ACCESS: FOUR FACTOR ANALYSIS

As a recipient of federal funding, the Baltimore Regional Transportation Board is required to take reasonable steps to ensure meaningful access to the information and services it provides.

To determine the “reasonable steps,” four factors¹ are considered:

1. The number and proportion of LEP persons in the eligible service area;
2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

The DOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in the Baltimore region in relation to the transportation planning process.

Factor 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population

To understand the language profile of LEP individuals in the Baltimore region, BMC staff uses data from the United States Census Bureau’s American Community Survey (ACS).

What is the ACS? The ACS is an ongoing survey that provides vital information on a yearly basis about our nation and its people. Information from the survey generates data that help determine how more than \$675 billion in federal and state funds are distributed each year.

Public officials, planners, and entrepreneurs use this information to assess the past and plan the future. When you respond to the ACS, you are doing your part to help your community plan for hospitals and schools, support school lunch programs, improve emergency services, build bridges, and inform businesses looking to add jobs and expand to new markets, and more.

Source: U.S. Census Bureau

First, staff analyzes data based on all answers to the three-part question²:

1. Does this person speak a language other than English at home?
 - Yes
 - No
2. If yes, what is the language?
3. How well does this person speak English?
 - Very well
 - Well
 - Not well
 - Not at all

¹ Federal Register / Volume 70, Number 239 / Wednesday, December 14, 2005 / Notices.

² U.S. Census Bureau, *Note for Language Spoken at Home from the 2016 American Community Survey*.

Individuals who speak a language other than English at home, and who speak English “well,” “not well,” or “not at all” (i.e. individuals who speak English less than “very well”) are considered to be LEP individuals.

Figures 2 and 3 show languages used at home by individuals ages 5 and over³ who speak English less than “very well” in the Baltimore region and for each of the local jurisdictions as well as the percentage of the entire population that speak each language. Figure 1 is limited to the top 5 languages spoken by individuals in each jurisdiction.

Figure 2: Languages Used At Home By Individuals Ages 5 And Over Who Speak English Less Than “Very Well” In The Baltimore Region

	Anne Arundel	Baltimore City	Baltimore	Carroll	Harford	Howard	Queen Anne’s ^a	Total for Region	Percent of Region
Population over 5	524,582	579,632	776,559	159,089	235,762	290,035	162,152	2,727,811	
Speak only English	468,331	525,777	668,992	151,015	219,588	220,209	152,447	2,406,359	88.22
Spanish	9,772	10,661	13,569	1,080	2,000	4,915	3,209	45,206	1.66
French ^b	318	947	838	59	102	234	54	2,552	0.09
Haitian	153	46	238	0	22	235	192	886	0.03
Russian	201	501	3,359	64	0	330	16	4,471	0.16
Gujarati	120	16	693	65	200	377	58	1,529	0.06
Urdu	281	589	1,279	33	73	671	38	2,964	0.11
Nepali ^c	454	760	1,162	52	38	96	0	2,562	0.09
Chinese ^d	853	1,089	3,486	103	316	3,396	234	9,477	0.35
Korean	1,366	781	2,451	120	354	5,635	43	10,750	0.39
Vietnamese	538	345	1,164	7	196	947	72	3,269	0.12
Tagalog ^e	825	478	1,448	107	158	404	75	3,495	0.13

Source: 2012-2016 American Community Survey (5-year) Estimates, Table B16001, "Language Spoken at Home for the Population 5 Years and Over"

a All jurisdictions have one or more PUMAs, except Queen Anne’s County. In that case, Queen Anne’s, Talbot, Caroline, Dorchester, & Kent Counties combined equal one PUMA. A Public Use Microdata Area, or PUMA, is a geographic unit used by the US Census for providing statistical and demographic information. Each PUMA contains at least 100,000 people.

b French (including Cajun)

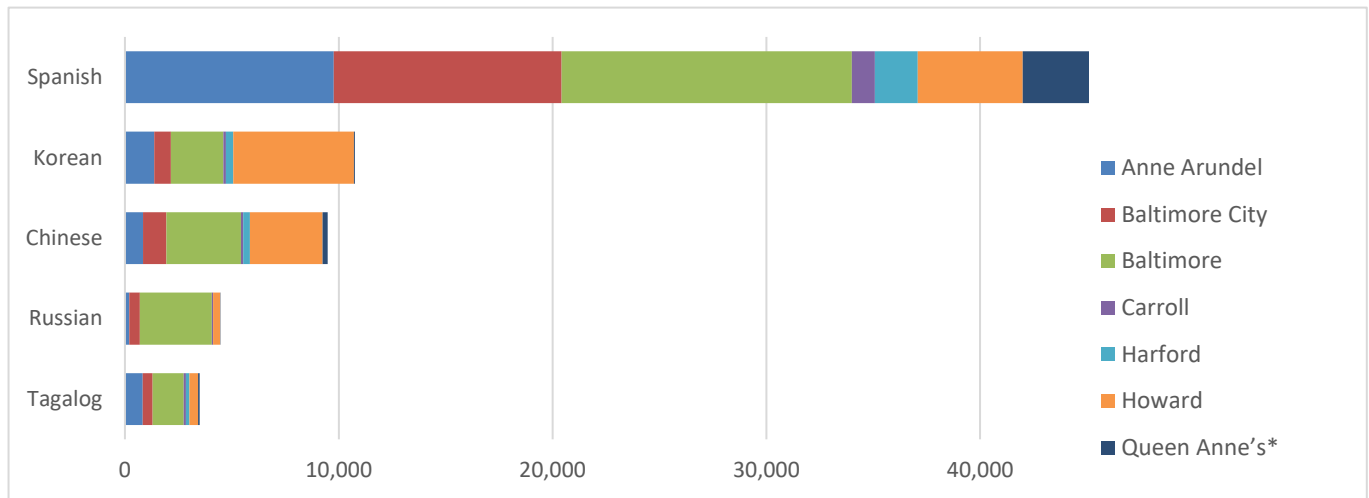
c Includes: Nepali, Marathi, or other Indic languages.

d Includes: Mandarin and Cantonese

e Includes: Filipino

³ Note: The U.S. Census Bureau does not collect data on language for people under 5 years old.

Figure 3: Five Most Common Languages Used At Home By Individuals Ages 5 And Over Who Speak English Less Than “Very Well” In The Baltimore Region



Source: 2012-2016 American Community Survey (5-year) Estimates, Table B16001, "Language Spoken at Home for the Population 5 Years and Over"

Staff then maps the data in order to locate concentrations of LEP individuals. In addition to concentrations of LEP individuals, staff identifies concentrations of six additional “vulnerable” populations to develop the Vulnerable Population Index, or VPI. Once complete, VPI maps are taken to member organizations and state, regional and local stakeholders, in order to both check the data for reasonableness, and to learn the stories beneath the data.

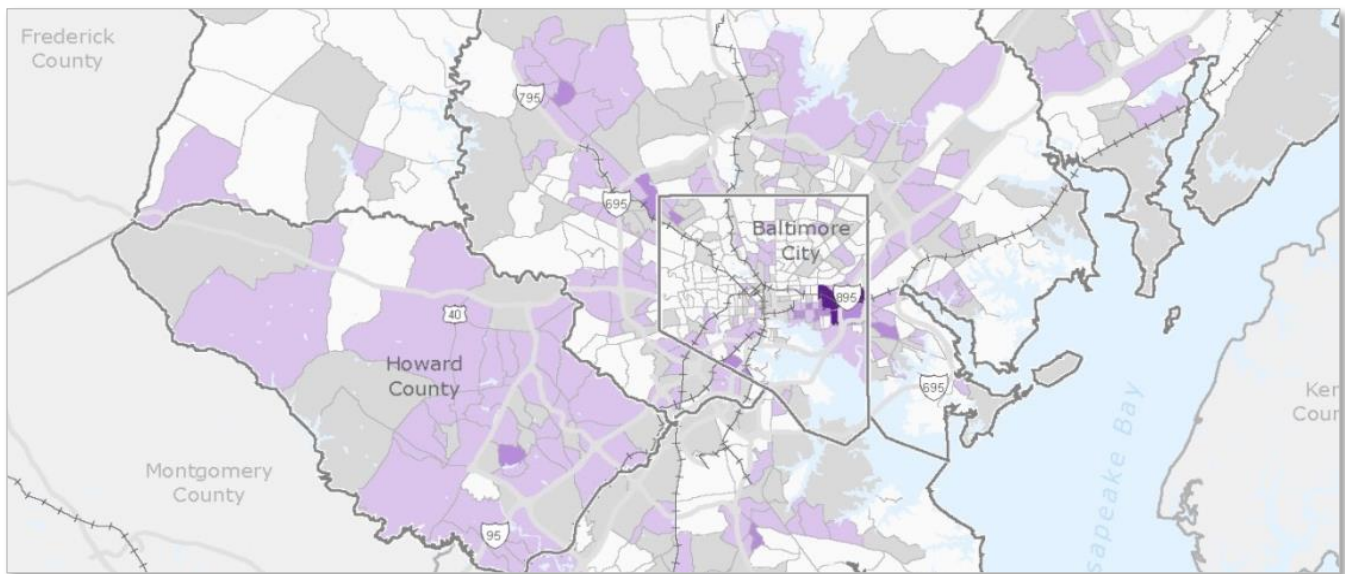
The maps can then be used to enable the BRTB to develop the most effective outreach strategies and materials for LEP individuals and other vulnerable populations.

Figure 3 is a portion⁴ of the VPI map of LEP individuals, and shows the percentage of individuals ages 5 years and older who speak English “not well” or “not at all” for each Census tract in the Baltimore region.⁵

⁴ Note: See Appendix 3 for the complete Vulnerable Population Index (VPI) for LEP.

⁵ Note: In order to focus most on individuals/communities with the most need, VPI calculations and maps for LEP do not include individuals who speak English “well.”

Figure 4: Percent of Population over 5 Years Old that Speaks English Less Than “Well”
(this needs to be replaced)



Source: 2012-2016 American Community Survey (5-year) Estimates, Table C16001, "Language Spoken at Home for the Population 5 Years and Over"

Factor 2: The Frequency with Which LEP Persons Come in Contact with the Program, Activity, or Service

Due to the small size of the LEP population and the nature of services provided by the BRTB, LEP involvement is currently infrequent.

Since the last LEP, no requests have been made for information by either individuals or groups, and targeted outreach has not resulted in increased participation by LEP individuals or service providers.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program

The BRTB approves the use of federal funds for future transportation projects as well as short-term transportation projects.

The BRTB does not own or operate any roads or buses and therefore does not provide any service or program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs (food, housing, education, etc.). Further, involvement with the BRTB or its subcommittees is entirely voluntary.

The BRTB does however provide opportunities for the public to comment on the use of federal funds in four major areas: the Unified Planning Work Program, a four-year Transportation Improvement Program, a 20-year long-range transportation plan, and the air quality conformity determination of plans and programs.

The impacts of transportation improvements resulting from these actions have an impact on all residents and efforts are made to encourage an understanding of the process and to provide opportunities to comment. As a result, the BRTB is concerned with input from all stakeholders and every effort is made to make the planning process as inclusive as possible.

Through the regional transportation planning process, selected projects receive approval for Federal funding and progress toward project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations are required to have their own policies in place to ensure opportunities for LEP individuals to participate in the process that shapes where, how and when a specific project is implemented.

Factor 4: The Resources Available to the Recipient and Costs

Because the LEP population in the region is not significant at this time and the cost of translating large documents is high, the BRTB has determined that full translation of regional transportation documents is not the most efficient use of limited funds.

However, the region is dynamic and continues to attract diverse ethnic and cultural populations. Further, the BRTB values the diversity within the region, as well as the importance of full and fair participation in the transportation decision-making process by those individuals and groups who have been traditionally underserved. Therefore, the BRTB will continue to ensure access for all and the participation of those whose everyday lives are affected by how they get to home to work, school, stores, and services. This will be done through a variety of mechanisms as outlined in the next section.



III. PROVIDING LANGUAGE ASSISTANCE MEASURES AND SERVICES

While 11.7% of the population in the Baltimore region is limited in their ability to read, write or speak English, the largest such group is Spanish speaking at 1.7%, and these individuals are from nearly two dozen countries. To date there have been very low levels of interaction by LEP individuals with the BRTB's regional transportation planning process, the BRTB believes that ensuring public access and engaging the diverse population within the region is essential.



Utilizing the NAICS (North American Industry Classification System) Code 541930, for the category of Translation and Interpretation Services, the BMC has identified 21 firms in the region and hundreds available across the country. BMC also maintains contact with a global service, CTS Language Link, that provides 24-7 services. Staff updates this list periodically.

Translation is the replacement of written text from one language into another. A translator also must be qualified and trained.

Interpretation renders a message spoken in one language into one or more other languages. Interpretation can take place in-person, through a telephonic interpreter, or via internet or video interpreting. An interpreter must be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the LEP individual.

Written Language Services (Translation)

As described above, translation is the replacement of written text from one language into another. Because the number and proportion of LEP individuals in the region are low, and because the costs of translation services are high (between 15 and 20 cents per word), translation of all BRTB written materials is neither warranted nor affordable. However, the BRTB will translate select materials, such as:

The following key documents are made available in Latin American Spanish reflecting the country of origin for the most people:

- Title VI Policy and Complaint Form
- Public Participation Plan
- Limited English Proficiency Plan
- About the BRTB
- Executive summary of the long-range transportation plan – Draft and final
- Executive summary of the Transportation Improvement Program (TIP)
- Vulnerable Population Index

Additional documents may be made available for translation upon request. Please note that larger documents will take longer to process. Call 410-732-0500 or email comments@baltometro.org to request assistance.

BMC Web site – A free online translation service, powered by Google Translate, is available on the Baltimore Metropolitan Council web site (www.baltometro.org) by clicking the “Translate” link at the top right of any page on the site. The BMC web site contains considerable information on the regional transportation planning process, as well as current versions of transportation plans and processes.

The BMC has chosen the top languages spoken in the region from the Google Translate suite to enable visitors to translate any page of text. Users should be aware, however, that Google Translate has its limitations. It is useful for getting the gist of the material but it does not translate all linguistic nuances.

In addition, documents such as PDFs or Word files on our website can be translated by visiting translate.google.com and clicking on the “translate a document” hyperlink. From there, you will then be prompted to upload the PDF or other file and select the target language. Please note this feature may not be enabled on all mobile devices at this time.

Outreach Materials – BMC staff will, when available, use Spanish language outreach materials from organizations such as federal, state, and local transportation agencies. For example, staff distributes Street Smart brochures and Air Quality Action Guides in Spanish. BMC staff keeps a list of such materials.

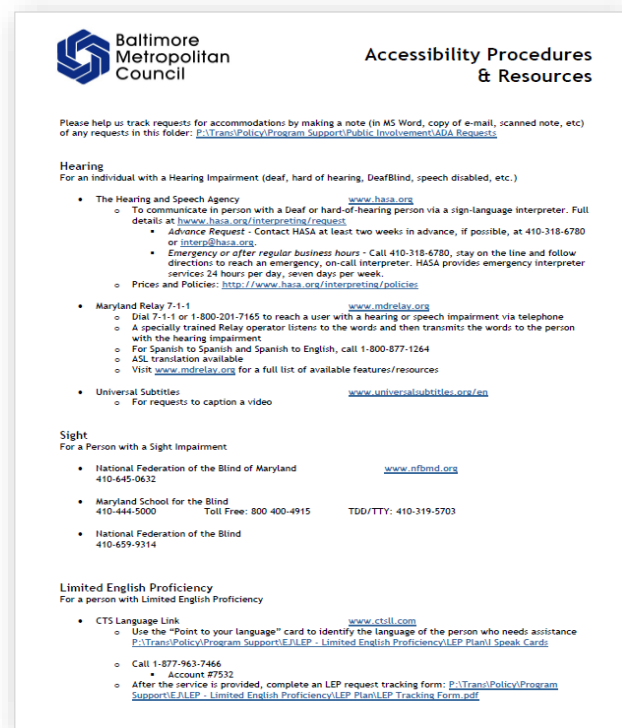
All BRTB outreach materials will not be translated at this time. However, the BRTB will consider requests to provide key outreach materials in Spanish, or other languages, as new materials are developed.

Oral Language Services (Interpretation)

Interpretation is the rendering of one spoken or signed language into that of another language. Oral interpretation can take place in-person or through a telephonic interpreter.

Access to interpretation and translation services are currently available to the BRTB through a number of services.

For interpreters, a request must be submitted at least seven business days prior to a meeting in order to provide sufficient time to coordinate services.



Training Staff

To establish meaningful access to information and services for individuals with limited English proficiency, staff in public contact positions are provided training periodically.

Training ensures that staff members are fully aware of the Language Access policies and procedures and are effectively able to work in person and/or by telephone with individuals with language access needs.

BRTB members and BMC staff will continue to be invited to trainings events, even if they do not interact regularly with LEP persons, to ensure that they are fully aware of and understand the plan so they are able to reinforce its importance and ensure its implementation by staff.

Providing Notice to LEP Persons

To ensure the public is aware of the BRTB's commitment to ensuring access for all, the following notice is included on all BRTB agendas and meeting announcements (flyers, advertisements, etc.)

The Baltimore Regional Transportation Board (BRTB) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws.

Appropriate services can be provided to qualified individuals with disabilities or those in need of language assistance, who submit a request at least seven business days prior to a meeting. Call 410-732-0500.

Electronically Accessible Information - The BMC website (www.baltometro.org) is designed to meet the standards set forth in Section 508 of the US Rehabilitation Act to ensure accessibility and usability.

The BRTB has established the following methods to inform individuals with limited English proficiency, supporting organizations, as well as the public, of available language assistance services.

1. *Posting signs* – A language identification chart is posted at the Reception Desk to inform LEP individuals who walk into the office how to access an interpreter.
2. *Advertisements of Key Comment Periods* – The BRTB will announce, in a local Spanish language publication, the dates and locations of public meetings related to the draft Transportation Improvement Program and draft long-range transportation plan. Additional advertisements may be placed as budget and staffing permits.

BMC staff maintain a list of local Spanish language publications.

3. *Public Notices* – When placing advertisements of key comment periods, the BRTB will include a public notice in Spanish about available LEP services.

Monitoring and Updating the LEP Plan

The BRTB will monitor evolving population data and the language needs of LEP individuals in the region. A review of the data this plan will be conducted at least every four years. The BRTB's Public Advisory Committee (PAC) and other BRTB committees will be asked to assist in this evaluation.

BMC staff will also keep a record of any LEP services requested and/or provided and will make this information available during the review process.

The BRTB will also utilize a survey/questionnaire to evaluate the provision of LEP services. This tool will be used following the request or use of LEP services and will be administered through an interpreter.

Appendix 1 - BRTB Title VI Complaint Procedure and Form

The BRTB has established the following complaint procedure and process that meets Title VI requirements. These can also be found online at www.baltometro.org/titlevi.

Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, national origin or other applicable laws, by the Baltimore Regional Transportation Board (hereinafter referred to as “the BRTB”) may file a Title VI complaint by completing and submitting the BRTB’s Title VI Complaint Form. The BRTB Board investigates complaints received no more than 180 days after the alleged discrimination. The BRTB will process complaints that are complete.

1. Once the complaint is received, the BRTB will review it to determine if the BRTB has jurisdiction. The Complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the BRTB. The BRTB has 30 days to investigate the complaint.
2. If more information is needed to resolve the case, the BRTB may contact the Complainant. The Complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the Complainant or does not receive the additional information within 30 business days, the BRTB can administratively close the case. A case can also be administratively closed if the Complainant no longer wishes to pursue their case.
3. After the investigator reviews the complaint, she/he will issue one of two letters to the Complainant: a closure letter or a *Letter of Finding*. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and details plans for remedial actions to provide redress. The written response shall be issued no later than 90 calendar days after the date the complaint is received.
4. If the Complainant wishes to appeal the decision, she/he has 30 days after the date of the Letter of Finding to do so.

If the Complainant is dissatisfied with the BRTB’s resolution of the complaint, she/he may also submit a complaint to the Maryland Department of Transportation for investigation. In accordance with Chapter VII, Title VI / Non-Discrimination Complaints, of Federal Transit Administration Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the [FTA Circular 4702.1A](#), outlines the complaint process to the United States Department of Transportation. Paper copies of the circular may be obtained by calling FTA's Administrative Services Help Desk, at 202-366-4865.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Ave., SE, Washington, DC 20590; or with the Federal Highway Administration, at FHWA Office of Civil Rights, Chief Investigations and Adjunction, 400 7th Street SW, Room 4132, Washington DC 20590.

For more information, please contact the Title VI Officer of the Baltimore Regional Transportation Board at (410) 732-0500 or titlevi@baltometro.org.

Para obtener más información, póngase en contacto con el título VI Oficial de la Junta de Transporte Regional de Baltimore en (410) 732-0500 o titlevi@baltometro.org.

Complaint Form

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

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

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

Signature and date required below

Signature

Date

Please submit this form to the Baltimore Metropolitan Council Title VI Officer at:

Mail: 1500 Whetstone Way, Suite 300
Baltimore, MD 21230-4767
E-mail: titlevi@baltometro.org
Fax: 410-732-8248

Appendix 2 - Laws and Policies Guiding Limited English Proficiency Plans

The following matrix illustrates these laws/policy and the considerations. Under Federal Certification of metropolitan planning organizations, by the Federal Highway Administration and the Federal Transit Administration, the LEP plan will be assessed and evaluated.

Title VI of the Civil Rights Act of 1964	Executive Order 13166 on Limited English Proficiency	MD Senate Bill 265 - Equal Access to Public Services for Individuals with Limited English Proficiency
Federal law	Federal policy	State law
Enacted in 1964	Signed August 2000	Effective July 2002
Considers all persons	Considers eligible population	Considers eligible population
Contains monitoring and oversight compliance review requirements	Contains monitoring and oversight requirements	Contains monitoring requirements and a timeline to implement. <i>(MDOT = July 2004; MTA = July 2005)</i>
Factor criteria is required, no numerical or percentage thresholds	Factor criteria is required, no numerical or percentage thresholds	All Maryland state agencies, departments, and programs provide equal access to public services for individuals with limited English proficiency.
Provides protection on the basis of race, color, and national origin	Provides protection on the basis of national origin	
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using factor criteria	Requires vital documents, such as applications and hearing notices, to be translated into any language spoken by any limited English proficient population that constitutes 3% of the overall population within a specified geographic area under specified circumstances.
Annual accomplishments identified	Annual accomplishments identified	

Appendix 3 – Vulnerable Population Index: Limited English Proficiency Layer

Figure 5 The Baltimore Region LEP Map

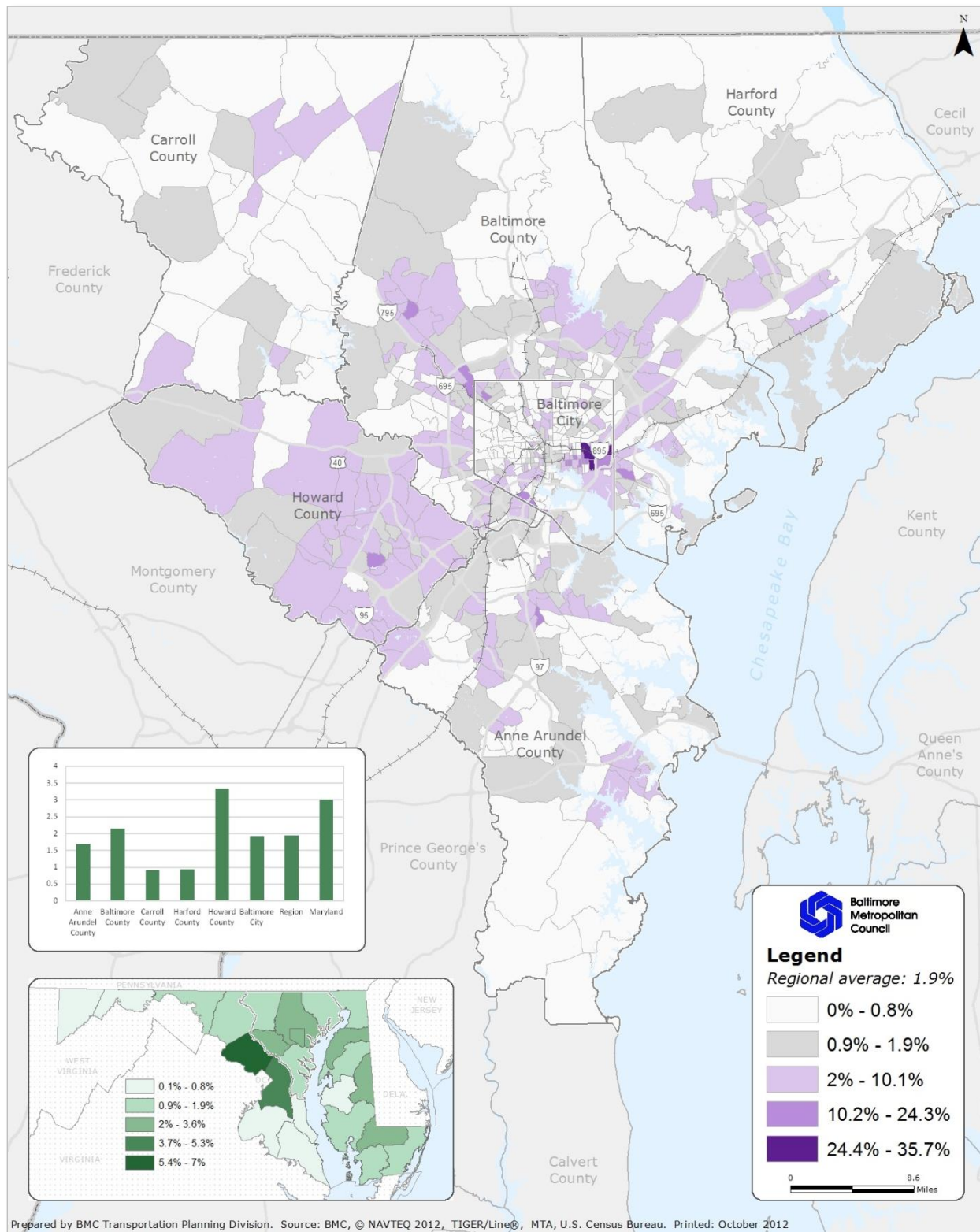


Figure 6: Jurisdiction's in the Baltimore Region and Top Languages Spoken

