

BALTIMORE METROPOLITAN PLANNING ORGANIZATION

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

**APPROVAL OF THE 2023 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, as well as Annapolis 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 Infrastructure Investment and Jobs Act (IIJA) 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, which requires recipients of federal funds to assess, monitor and address the needs of Limited English Proficiency (LEP) individuals seeking assistance (Attachment 1); 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 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 approves the 2023 Limited English Proficiency Plan (Attachment 2) 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 June 27, 2023 meeting.

6-27-23

Date



Sam Snead, Chair
Baltimore Regional Transportation Board

Limited English Proficiency Plan Fact Sheet

Background: Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type or service, benefit, or encounter.

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:

- The number and proportion of LEP persons in the eligible service area;
- The frequency with which LEP persons come in contact with the program;
- The importance of the service provided by the program; and
- 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 to any language 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 the short-range transportation improvement program (draft & final).

Full translation of the Public Participation Plan, Limited English Proficiency Plan, Title VI Policy and Complaint Form, and the "About the BRTB" brochure.


The BRTB will provide oral language services to LEP individuals upon request.

A review of the data this plan is based on (ACS 5-year data from 2017-2021) 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

June 27, 2023





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.

BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.

Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay. Usuarios de Relay MD marquen 7-1-1.

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

The U.S. Department of Transportation, (the Federal Highway Administration, and the Federal Transit Administration) and the Maryland Department of Transportation contributed funding towards the preparation of this document.



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 Baltimore Regional Transportation Board (BRTB). Assistance is also available at events for individuals who are in need of language assistance.

This plan details how the BRTB assesses and then 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 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) that 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 (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.

Upon request, BMC provides interpretation services, including language translation services and signage for the hearing impaired, at public meetings with seven days advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.



Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay. Usuarios de Relay MD marquen 7-1-1

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

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

The BRTB developed this policy to guide BMC staff and outline how the BRTB will provide certain services to accommodate people with special needs, including LEP individuals. Staff having contact with the public are 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.

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.

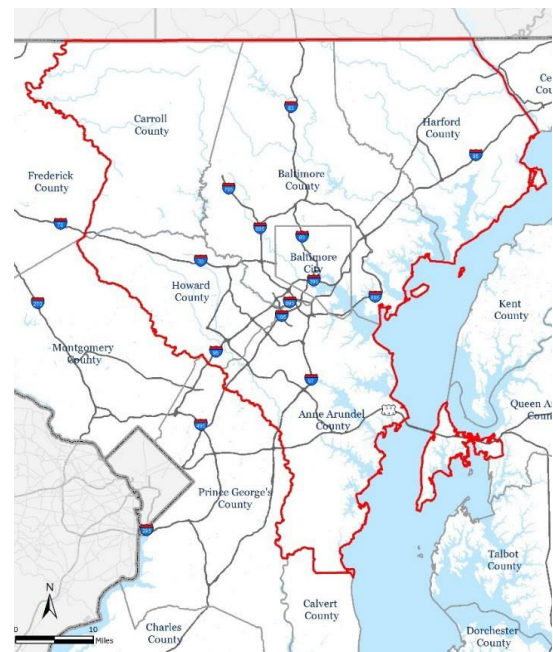
The BRTB is a 13-member board representing:

- 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 *
- Annapolis Transit **

* Non-voting member

** Designated voting representative of public transportation providers

Figure 1: The Baltimore MPO



BRTB meetings are generally held on the fourth Tuesday of each month. Four meetings per year are in person and all meetings are available online. BMC offices are located at 1500 Whetstone Way, Suite 300, Baltimore, MD 21230. Visit www.baltometro.org to learn more about the BRTB or to see a current calendar of meetings and events.

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, 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

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 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's LEP Guidance

The U.S. Department of Transportation issued updated [guidance](#) to recipients of Federal transportation aid in 2016 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.

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).

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

What is the ACS? The ACS (American Community Survey) is an ongoing survey of the U.S. Census Bureau 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

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.

Figure 2 shows 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 2 is sorted by the top languages at the regional level. The top five languages within each jurisdiction and the region are highlighted.

² U.S. Census Bureau, Note for Language Spoken at Home from the 2021 American Community Survey.

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

Figure 2: Languages Used at Home by Individuals Ages 5 and over Who Speak English Less Than “Very Well” in the Baltimore Region (Top 5 Highlighted)

	ANNE ARUNDEL	BALTIMORE CITY	BALTIMORE COUNTY	CARROLL COUNTY	HARFORD COUNTY	HOWARD COUNTY	QUEEN ANNE'S ^a	TOTAL FOR REGION	% OF REGION
Population over 5	548,783	555,698	801,113	162,858	244,781	310,261	163,721	2,787,215	100%
Speak only English	482,792	498,441	681,641	154,092	226,220	229,120	153,085	2,425,391	87.02%
Speak language other than English at home and speak English very well	45,398	37,276	79,432	6,239	13,356	57,932	6,483	246,116	8.83%
Spanish	10,421	8,837	13,406	1,075	2,543	5,313	3,271	44,866	1.61%
Chinese ^b	1,869	1,425	2,929	291	431	4,113	260	11,318	0.41%
Korean	1,381	839	1,956	136	315	4,774	62	9,463	0.34%
Yoruba, Twi, Igbo, or other languages of Western Africa	561	1,369	2,095	0	47	299	0	4,371	0.16%
Arabic	252	1,581	1,415	35	53	546	3	3,885	0.14%
Russian	216	428	2,497	90	39	252	13	3,535	0.13%
Urdu	245	238	1,925	113	86	675	30	3,312	0.12%
Nepali, Marathi, or other Indic languages	252	338	2,196	0	87	254	15	3,142	0.11%
Vietnamese	516	281	1,071	103	233	712	6	2,922	0.10%
Tagalog ^c	1,261	329	731	67	166	335	20	2,909	0.10%
French ^d	266	1,256	788	16	91	371	53	2,841	0.10%
Other languages of Asia	153	10	1,053	40	0	743	3	2,002	0.07%
Gujarati	589	20	469	15	150	613	17	1,873	0.07%
Amharic, Somali, or other Afro-Asiatic languages	55	525	958	25	0	264	0	1,827	0.07%
Persian ^e	139	196	873	0	36	455	16	1,715	0.06%
Hindi	207	69	624	52	23	690	41	1,706	0.06%
Punjabi	212	37	867	24	89	175	0	1,404	0.05%
Portuguese	358	211	133	54	21	308	79	1,164	0.04%
Greek	116	264	427	10	111	36	3	967	0.03%
Telugu	97	20	91	0	0	747	0	955	0.03%
Bengali	181	147	465	8	69	67	11	948	0.03%
Italian	114	152	334	45	96	150	14	905	0.03%
German	235	155	125	24	42	200	41	822	0.03%

	ANNE ARUNDEL	BALTIMORE CITY	BALTIMORE	CARROLL	HARFORD	HOWARD	QUEEN ANNE'S ^a	TOTAL FOR REGION	% OF REGION
Swahili or other languages of Central, Eastern, and Southern Africa	19	114	536	61	8	61	0	799	0.03%
Thai, Lao, or other Tai-Kadai languages	108	136	189	0	80	189	0	702	0.03%
Other Indo-European languages	81	129	319	34	0	118	17	698	0.03%
Japanese	202	111	194	23	14	102	38	684	0.02%
Polish	93	157	212	0	106	49	28	645	0.02%
Ukrainian or other Slavic languages	74	53	263	18	135	30	10	583	0.02%
Other and unspecified languages	63	117	241	1	0	46	11	479	0.02%
Tamil	0	123	33	6	18	257	0	437	0.02%
Hebrew	115	111	188	2	0	0	18	434	0.02%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	23	36	59	126	82	72	0	398	0.01%
Malayalam, Kannada, or other Dravidian languages	14	24	110	0	34	139	0	321	0.01%
Haitian	0	100	39	22	0	31	54	246	0.01%

Source: 2017-2021 American Community Survey (5-year) Estimates, Table B16001, "Language Spoken at Home By Ability to Speak English for the Population 5 Years and Over"

a Data is available at the PUMA level. Public Use Microdata Areas (PUMAs) are non-overlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas containing no fewer than 100,000 people each. 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. The numbers for Queen Anne's reflect those for the PUMA containing Queen Anne's County. 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 includes Mandarin, Cantonese

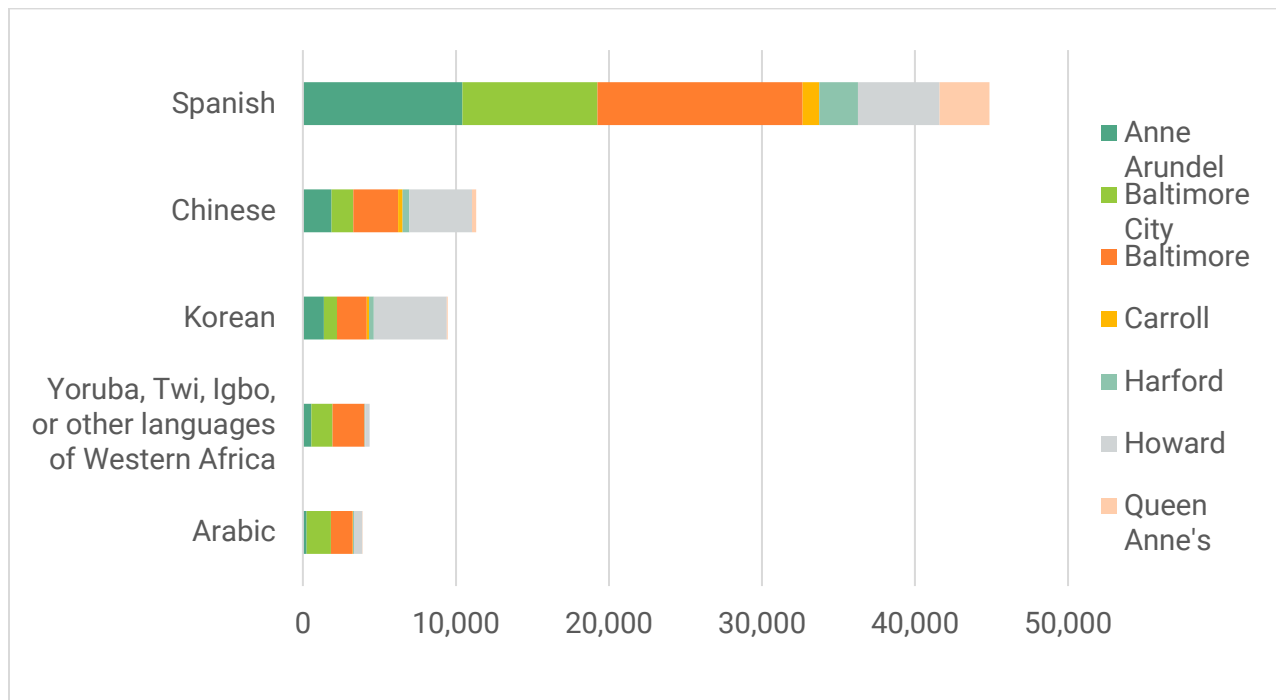
c includes Filipino

d includes Cajun

e includes Farsi, Dari

Figure 3 shows the five most common languages used at home by individuals ages 5 and over who speak English less than “very well” in the Baltimore region. These languages are Spanish; Chinese; Korean; Yoruba, Twi, Igbo, or other languages of Western Africa; and Arabic. Each language is broken down by the number of individuals within each local jurisdiction.

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

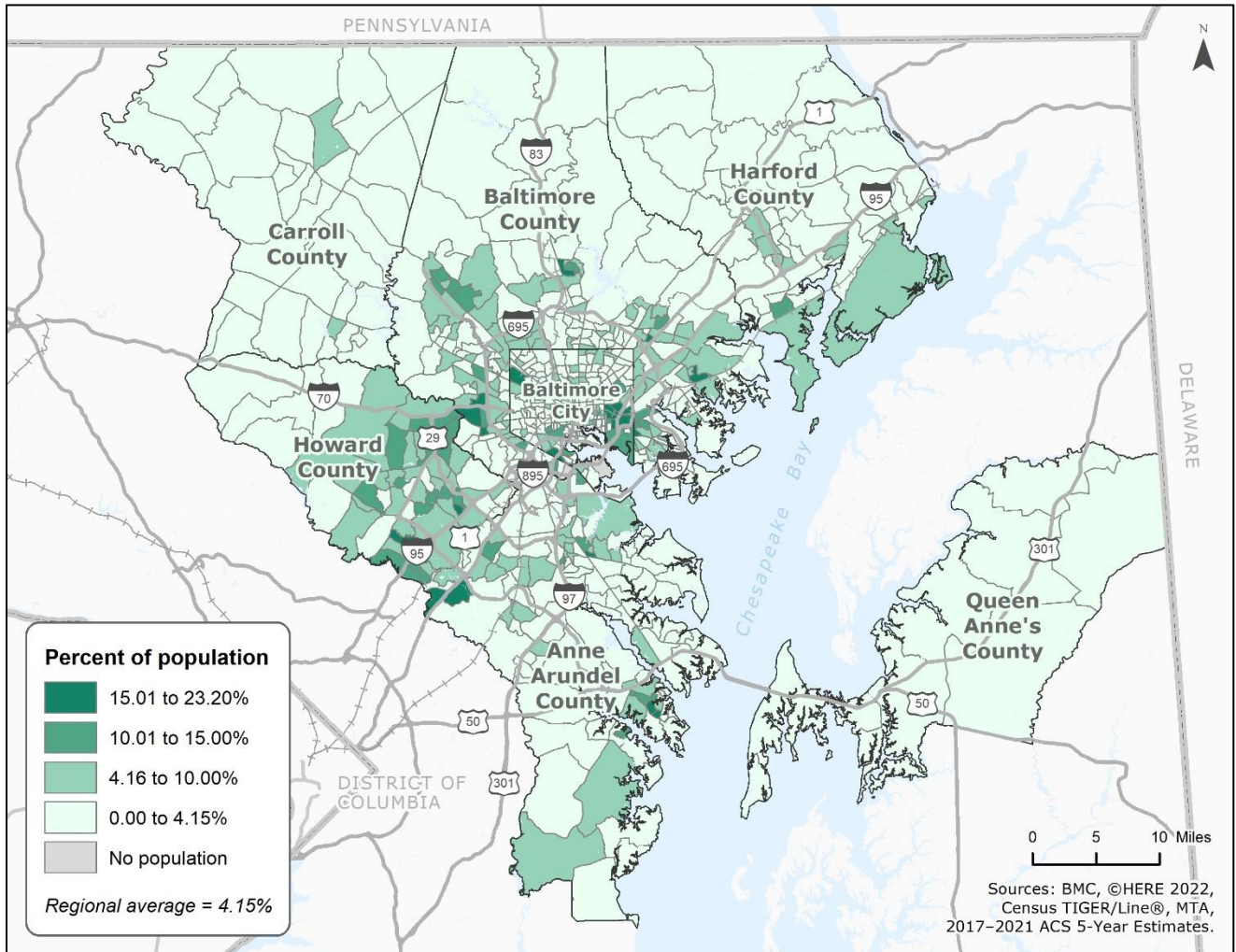


Source: 2017-2021 American Community Survey (5-year) Estimates, Table B16001, "Language Spoken at Home By Ability to Speak English for the Population 5 Years and Over"

Staff then maps the data for the percent of the population over 5 years old that speaks English less than “very well.” The maps enable the BRTB to develop the most effective outreach strategies and materials for LEP individuals.

Figure 4 shows this map of LEP individuals, and shows the percentage of individuals 5 years and older who speak English less than “very well” for each Census tract in the Baltimore region.

Figure 4: Percent of Population over 5 Years Old that Speaks English Less Than “Very Well”



Source: 2017-2021 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. There are other regional opportunities such as the Public Participation Plan as well as localized opportunities such as a chance to weigh in on local corridor projects such as Patapsco Regional Greenway segments.

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 efforts are 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 importance of full and fair participation in the decision-making process by those 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 from home to work, school, stores, and services.

Providing Language Assistance Measures And Services



While 4.15% 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 1.61%. To date there have been very low levels of interaction by LEP individuals with the BRTB's regional transportation planning process.

Utilizing the NAICS (North American Industry Classification System) Code 541930, for the category of Translation and Interpretation Services, the BMC has identified a limited number of firms in the region that can provide services, however many more available across the country. BMC also maintains contact with a global service, Language Link, that provides 24-7 services. A recent update of the list of services showed that the pandemic had an adverse impact of the number of firms available in the Baltimore region.

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

Interpretation is an oral service that 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, translation of all BRTB written materials is neither warranted nor affordable. The average cost of a professional translator can range anywhere from \$0.10 to \$0.30 per word, depending on the language pair being translated, the quality of the translation, the turnaround time, and other factors. 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 with limited English proficiency in this region:

- 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 “Select Language” drop down menu 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 displays all the languages available in 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.
- Google translate is also available on project websites developed through publicinput.com, a tool currently being used to solicit public comments. Participants can also leave a voicemail in another language and publicinput translates the voicemail for staff.
- 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, there is a prompt 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 Look Alive safety 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. Call 410-732-0500 or email comments@baltometro.org to request assistance.

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.

BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days

advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.

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Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay. Usuarios de Relay MD marquen 7-1-1

Si se necesita información de Título VI en español, llame al 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.

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 in this plan will be conducted at least every four years.

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

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.



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/non-discrimination.

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 Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go 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?

☐ Yes

☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court _____ ☐ State Agency _____

☐ State Court _____ ☐ Local Agency _____

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

Name:
Title:
Agency:
Address:
Telephone:
Section VI:
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below

Signature

Date

Please submit this form 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. (MDOT = July 2004; MDOT MTA = July 2005)
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

Provides protection on the basis of race, color and national origin	Provides protection on the basis of national origin	services for individuals with limited English proficiency.
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
Annual accomplishments identified	Annual accomplishments identified	constitutes 3% of the overall population within a specified geographic area under specified circumstances.

