

**Title VI**  
**2018 – 2020 Implementation Plan**  
**Title VI of the Civil Rights Act of**  
**1964**

**Montgomery County Department of Transportation**  
**Division of Transit Services**



**Adopted date**  
**March 31, 2018**

## Contents

I.	INTRODUCTION .....	2
II.	OVERVIEW OF SERVICES .....	3
III.	POLICY STATEMENT AND AUTHORITIES .....	10
IV.	NONDISCRIMINATION ASSURANCES TO MTA.....	11
V.	PLAN APPROVAL DOCUMENT.....	12
VI.	ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES.....	12
VII.	GENERAL REPORTING REQUIREMENTS.....	15
VII.	REQUIREMENTS OF TRANSIT PROVIDERS.....	18
IX.	Appendices.....	19
	Appendix A – Title VI Assurances, Policy and Notice.....	19
	Appendix B – Title VI Complaint Procedures and Form.....	22
	Appendix C – Description of Title VI Investigations, Lawsuits and Complaints .....	27
	Appendix D – Summary of Public Outreach Activities .....	28
	Appendix E – Language Assistance Plan.....	31
	Appendix F – Minority Representation on Ride On Advisory Committees – August 2017.....	32
	Appendix G – Title VI Policies .....	33
	Appendix H – Fare and Major Service Changes – 2015 to 2017 .....	36
	Appendix I – Montgomery County Council Approval .....	38

## **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.

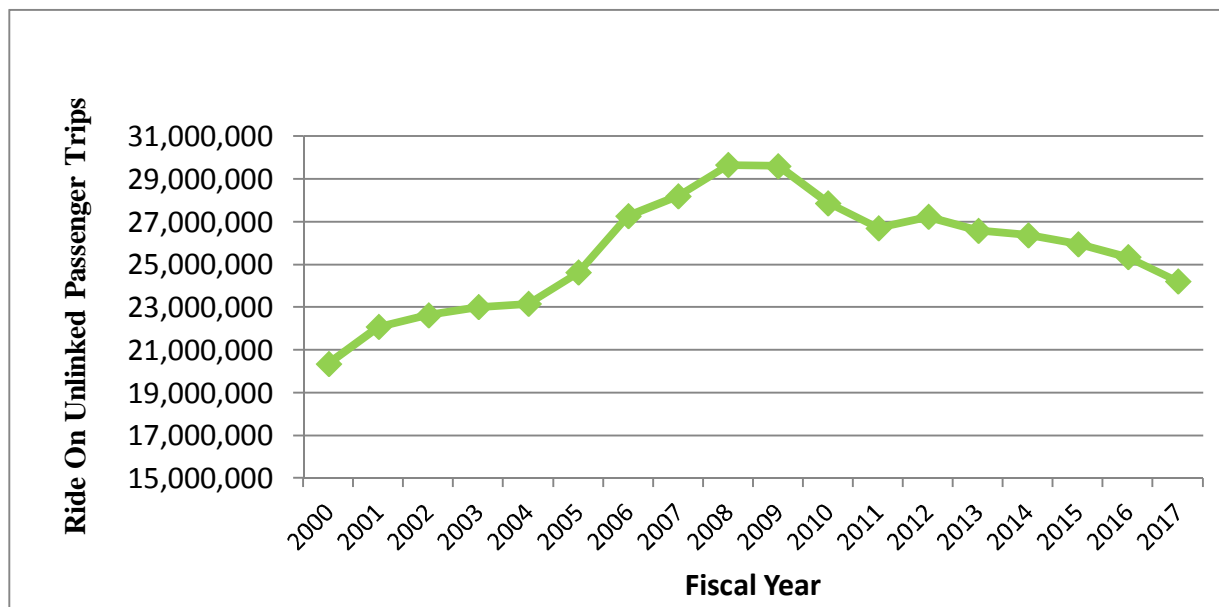
This document details how Montgomery County incorporates nondiscrimination policies and practices in providing services to the public.

## II. OVERVIEW OF SERVICES

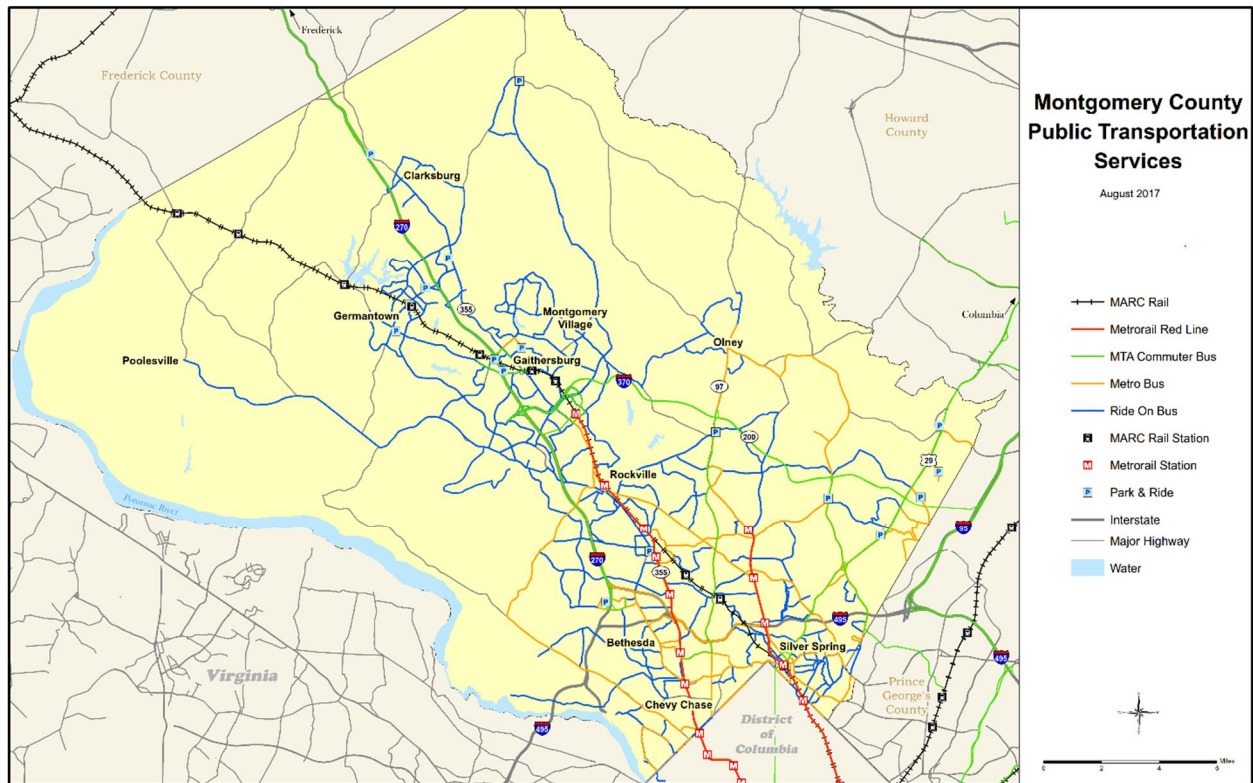
Montgomery County is in Maryland northwest of the Washington, D.C. It is Maryland's most populous county with a 2016 population of 1,043,863 - a 7.4 percent increase over 2010. Public transportation in suburban Maryland is provided through partnerships between the Maryland Department of Transportation – Maryland Transit Administration (MTA), the Washington Metropolitan Transit Authority (WMATA) and local jurisdictions including Montgomery and Prince George's counties. Montgomery County is served by multiple transit agencies. The Washington Metropolitan Transit Authority (WMATA) provides rapid rail service with the Red Line and local bus services on 17 bus lines. Through MTA, the MARC provides commuter rail services. The MTA Commuter Bus program also provides commuter bus services and Ride On provides local and express bus services.

Ride On is a local transit service owned and operated by Montgomery County. Since starting as a feeder bus service to Washington's Metro, Ride On has grown to its 287 peak vehicles on 78 different bus routes as of FY17 year end,. During fiscal year 2017 (FY17) Ride On operated 3,389 average weekday revenue hours and provided 78,928 average weekday passenger trips. Figure 1 shows Ride On unlinked passenger trips from fiscal year 2000 to fiscal year 2017 and Figure 2 illustrates the public transportation services in the County.

**Figure 1: Ride On Fixed Route Bus Unlinked Passenger Trips FY2000 to FY2017**

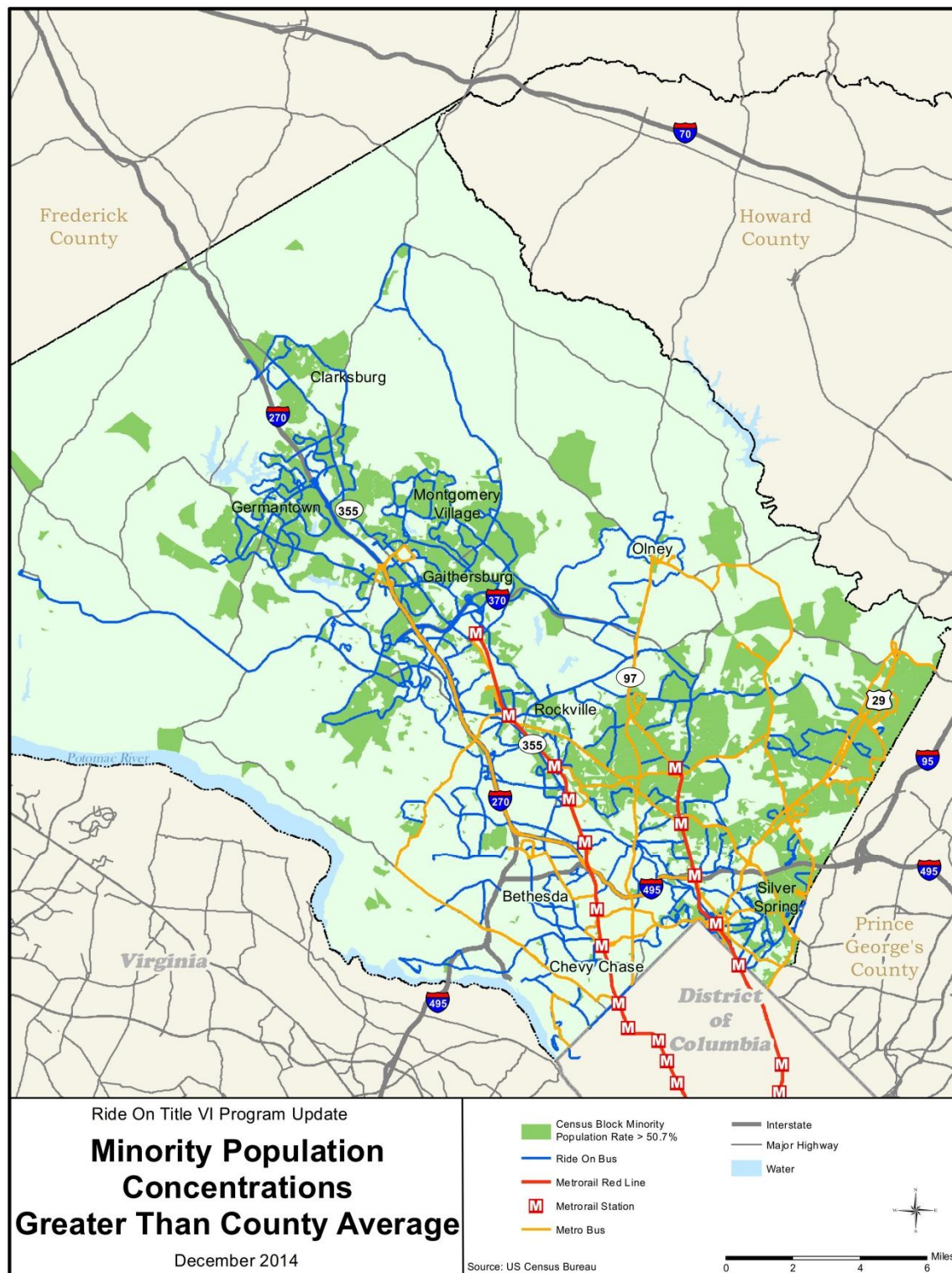


**Figure 2: Montgomery County Public Transportation Services**



Using the 2010 U. S. Census, Figure 3 shows the distribution of minority populations within Montgomery County

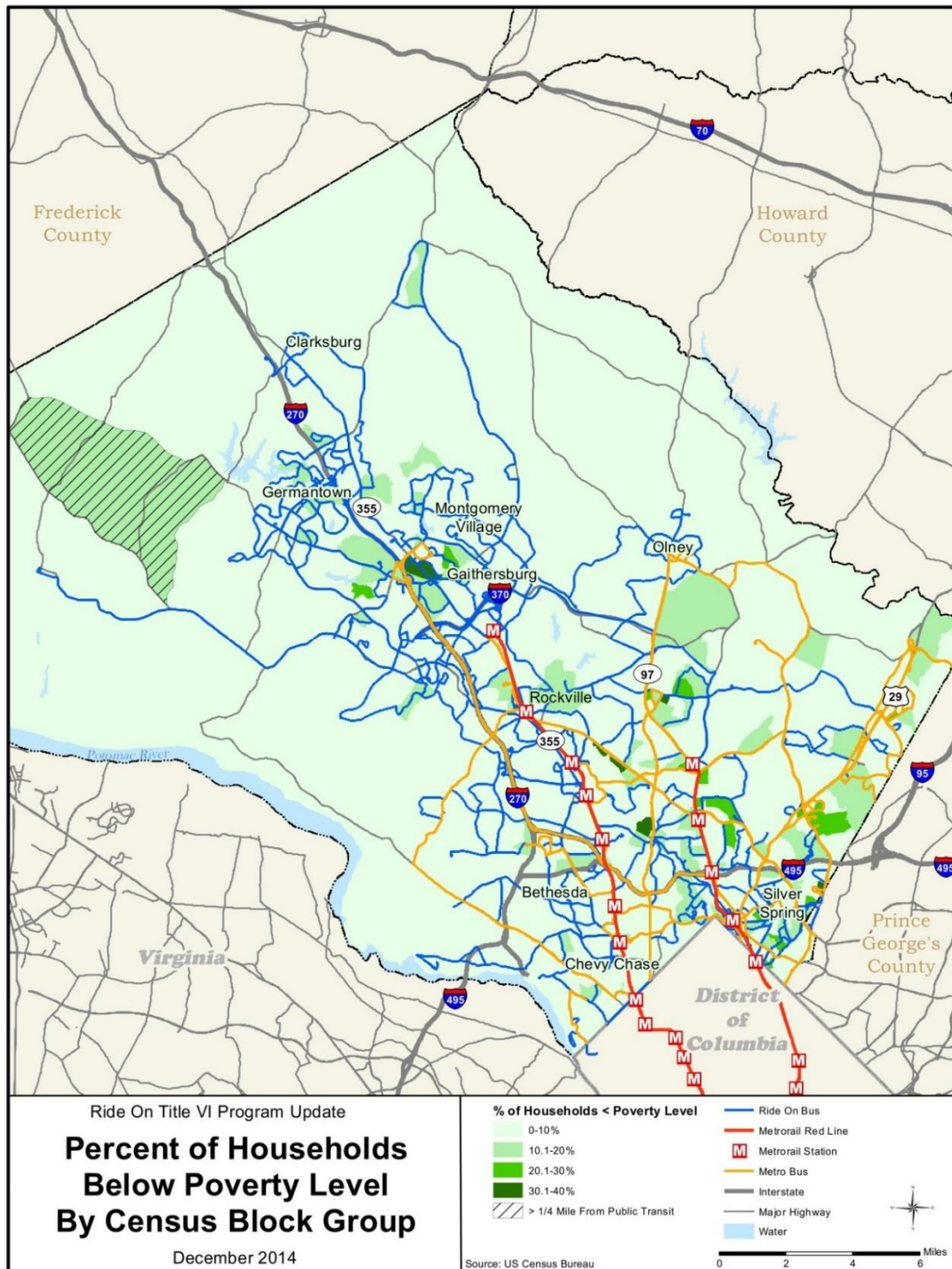
**Figure 3: Minority Populations Greater than County Average**





Using the 2010 U. S. Census, Figure 4 presents the number of households below the poverty level.

Figure 4: Percent of Households below the Poverty Level



The Ride On on-board survey was conducted from July 28, 2014 to November 7, 2014. On-board surveys were available in the seven primary languages spoken in Montgomery County including English, Spanish, Chinese, Korean, Vietnamese, Amharic, and French. Figure 5 shows the English version of the survey.

Data collectors were instructed to ask customers to participate in the survey and hand each participating customer a small clipboard and survey so that the survey could be completed on-board the bus. 10,666 completed surveys were returned to the data collectors. Of the surveys returned, 9,500 were English, 1,130 were Spanish and 36 were in other languages. Not all respondents responded to each question so the number of responses by question varies. Table 1 tabulates the results by ethnic background.

**Table 1: Ride On Ridership Ethnic Background**

<b>Ethnic Background</b>	<b># of Responses</b>	<b>% of Responses</b>
American Indian or Alaskan Native	116	1.1
Asian	980	9.5
Black or African Descent	4,352	42.3
European Descent	1,693	16.4
Hawaiian or other Pacific Islander	28	0.3
Hispanic	2,242	21.8
Middle Eastern Descent	148	1.4
Other and Two or More Races	736	7.1
Total Responses	10,295	100.0
Blank or no response	464	
Total Surveys Returned	10,759	
Source: Ride On On-board Survey – December 2014		



Table 2 tabulates the results by household income.

**Table 2: Ride On Ridership Household Income**


<b>Household Income</b>	<b># of Responses</b>	<b>% of Responses</b>
Less than \$20,000	2,744	29.4
\$20,000 to \$29,999	2,406	25.8
\$30,000 to \$49,999	1,947	20.9
\$50,000 to \$74,999	838	9.0
\$75,000 to \$99,999	458	4.9
\$100,000 to \$149,999	481	5.2
\$150,000 to \$199,999	249	2.7
\$200,000 or more	197	2.1
Total Responses	9,320	100.0
Blank or no response	1,439	
Total Surveys Returned	10,759	
Source: Ride On On-board Survey – December 2014		



Figure 5: Ride On On-board Survey - English

## MONTGOMERY COUNTY RIDE ON - RIDER SURVEY

Please help improve  services

Route: \_\_\_\_\_ Direction: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ DC: \_\_\_\_\_

- 1. How did you get to this bus? (Check all the apply)**

<input type="checkbox"/> Walk	<input type="checkbox"/> Metrorail	<input type="checkbox"/> Ride On Route: _____	<input type="checkbox"/> Metro Bus Route: _____
<input type="checkbox"/> Drive a car that was parked	<input type="checkbox"/> Carpool	<input type="checkbox"/> Bicycle	<input type="checkbox"/> Taxi
- 2. Where did you come from? (Check one)**

<input type="checkbox"/> Work	<input type="checkbox"/> Home	<input type="checkbox"/> School	<input type="checkbox"/> Other
-------------------------------	-------------------------------	---------------------------------	--------------------------------

Address or Intersection: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_
- 3. Where are you going? (Check one)**

<input type="checkbox"/> Work	<input type="checkbox"/> Home	<input type="checkbox"/> School	<input type="checkbox"/> Other
-------------------------------	-------------------------------	---------------------------------	--------------------------------

Address or Intersection: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_
- 4. After riding this bus, how will you get to where you are going? (Check all that apply)**

<input type="checkbox"/> Walk	<input type="checkbox"/> Metrorail	<input type="checkbox"/> Ride On Route: _____	<input type="checkbox"/> Metro Bus Route: _____
<input type="checkbox"/> Drive a car that was parked	<input type="checkbox"/> Carpool	<input type="checkbox"/> Bicycle	<input type="checkbox"/> Taxi
- 5. What type of fare did you pay for this trip? (Check one)**


<input type="checkbox"/> SmarTrip Fare	<input type="checkbox"/> Regular Cash Fare	<input type="checkbox"/> Senior/Disabled	<input type="checkbox"/> 7 Day Pass
<input type="checkbox"/> Monthly Pass	<input type="checkbox"/> Montgomery College Pass	<input type="checkbox"/> Youth Cruiser	<input type="checkbox"/> Student ID Flash Pass
<input type="checkbox"/> MCG Employee Pass	<input type="checkbox"/> MARC Ticket or Transit Link Card (TLC)	<input type="checkbox"/> Metro Access	
- 6. What is your ethnic background?**

<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Asian	<input type="checkbox"/> Black or African Descent	<input type="checkbox"/> European Descent
<input type="checkbox"/> Hawaiian or other Pacific Islander	<input type="checkbox"/> Hispanic	<input type="checkbox"/> Middle Eastern	<input type="checkbox"/> Two or More Races

☐ Something else, specify: \_\_\_\_\_
- 7. Which best describes your annual household income?**

<input type="checkbox"/> Less than \$20,000	<input type="checkbox"/> \$20,000 to \$29,999	<input type="checkbox"/> \$30,000 to \$49,999	<input type="checkbox"/> \$50,000 to \$74,999
<input type="checkbox"/> \$75,000 to \$99,999	<input type="checkbox"/> \$100,000 to \$149,999	<input type="checkbox"/> \$150,000 to \$199,999	<input type="checkbox"/> \$200,000 or more
- 8. How often do you use Ride On bus service?**

<input type="checkbox"/> Daily (8 or more weekly trips)	<input type="checkbox"/> Often (4 to 8 weekly trips)	<input type="checkbox"/> Occasionally (1 to 3 weekly trips)
---	--	---



CONTINUED ON BACK

**9. How long have you used Ride On?**

☐ Less than a year      ☐ 1 to 3 years      ☐ 4 to 9 years      ☐ 10+ years

**10. Are you a Federal Employee (either civilian or military)?**

☐ Yes      ☐ No

**11. What is your gender?**

☐ Female      ☐ Male

**12. Do you predominantly speak a language other than English at home?**

☐ Yes      ☐ No      What is this Language: \_\_\_\_\_

**13. How well do you read English?**

☐ Very well      ☐ Well      ☐ Not well      ☐ Not at all

**14. How well do you speak English?**

☐ Very well      ☐ Well      ☐ Not well      ☐ Not at all

**15. What is your age?**

☐ Under 18    ☐ 18-24    ☐ 25-34    ☐ 35-54    ☐ 55-64    ☐ 65+

**16. What is your education level?**

☐ High School      ☐ Some College      ☐ Bachelor Degree      ☐ Post Graduate

**17. Where do you live?**

☐ Montgomery County      ☐ Prince George's County      ☐ District of Columbia      ☐ Northern Virginia  
☐ Other: \_\_\_\_\_

**18. Rate your Ride On experience.**

	Excellent	Very Good	Good	Fair	Poor
On-time Performance	(5)	(4)	(3)	(2)	(1)
Bus Drivers	(5)	(4)	(3)	(2)	(1)
Bus Condition	(5)	(4)	(3)	(2)	(1)
Overall	(5)	(4)	(3)	(2)	(1)

**19. How should Ride On communicate with you regarding service changes, public service and emergency announcements, safety tips, etc.?**

☐ Twitter ([twitter.com/RideOnMCT](https://twitter.com/RideOnMCT))      ☐ Facebook ([facebook.com/RideOnMCT](https://facebook.com/RideOnMCT))      ☐ Email  
Subscribe to our email: [montgomerycountymd.gov/govdelivery](mailto:montgomerycountymd.gov/govdelivery)  
☐ Other: \_\_\_\_\_

**20. Smart Phones and Apps**

Do you use a smart phone and apps?      ☐ Yes      ☐ No  
Do you use the Ride On Real Time App?      ☐ Yes      ☐ No  
Do you use another transit app for Ride On info?      ☐ Yes      ☐ No  
Which One? \_\_\_\_\_  
Do you get text messages for Ride On bus times?      ☐ Yes      ☐ No



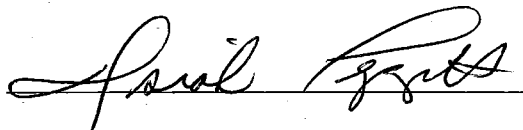
**THANK YOU!**

### III. POLICY STATEMENT AND AUTHORITIES

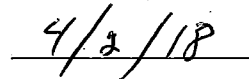
#### Title VI Policy Statement

Montgomery 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.

Ride On'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/FTA/MWCOG**

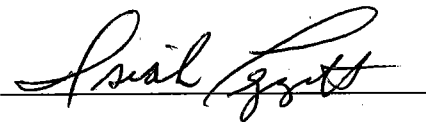
In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Maryland 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. Montgomery County also submits these assurance to the FTA as a direct recipient.

As part of the Certifications and Assurances submitted to FTA annually and MTA at the time of grant application and award, Montgomery 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).

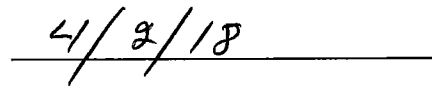
In signing and submitting the assurance, Montgomery County confirms to the FTA and MTA our commitment to nondiscrimination and compliance with federal and state requirements.

**V. PLAN APPROVAL DOCUMENT**

I hereby acknowledge the receipt of the Montgomery 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 Montgomery County's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Signature of Authorizing Official



DATE

**Isiah Leggett, County Executive**

**Montgomery County, Maryland**

The acknowledgement of the County Council approval of the Montgomery County Title VI Plan is included in Appendix I.

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

Under the authority of Montgomery County, the Senior Planning Specialist will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The Montgomery County Office of Human Rights is responsible for receiving, investigating and resolving Title VI complaints. 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 recording, data collection and reporting, annual review and updates, and internal education. The Montgomery County Office of Human Rights is responsible for receiving, investigating and resolving Title VI complaints.

**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. Upon receipt, record Title VI complaints and forward them to the MTA and the Montgomery County Office of Human Rights for investigation.



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, **Montgomery 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 direct recipient and sub-recipient of FTA funds, **Montgomery County** is required to submit a Quarterly Report Log to the FTA/MTA that documents any Title VI complaints received during the preceding quarter and for each year. **Montgomery County** will also maintain and provide to the FTA/MTA on 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, **Montgomery County** will submit to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

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

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

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

### **4. Dissemination of information related to the Title VI program**

Information on the Montgomery County 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. **Montgomery County** will report the complaint to FTA/MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to FTA/MTA.

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

Montgomery County Title VI policies and procedures are documented in this Plan and its appendices and attachments. This Plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

## **7. Internal education**

Division of Transit Services 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 Safety and Training Manager.

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

In all federal procurements requiring a written contract or Purchase Order (PO), **Montgomery County's** contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Contracts Manager 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. The Division of Transit Services Standard Operating Procedure for Title VI Assurances, Policy and Notice is included as Appendix A including the list of posting locations.

### **TITLE VI COMPLAINT PROCEDURES**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities. The Division of Transit Services Title VI Complaint Procedures and Form are included in Appendix B.

### **TITLE VI COMPLAINT FORM**

The Division of Transit Services Title VI Complaint Procedures and Form are included in 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.

During the period January 1, 2014 through December 31, 2017 there were two Title VI complaints which are listed in Appendix C.

### **PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that **Montgomery 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.

**Montgomery County** has established a public participation plan contained in Appendix D that describes how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

**Montgomery 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.

Appendix D includes a list of the public outreach activities during the reporting period.

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

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 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. **Montgomery County** developed the Language Assistance Plan dated August 2017 (Appendix E) using the FTA guidelines.

### **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.”

**The Division of Transit Services** has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which it selects. Appendix F includes a racial breakdown of the membership of the Ride On Transit Advisory Committee.



## **VII. REQUIREMENTS OF TRANSIT PROVIDERS**

### **SERVICE STANDARDS AND POLICIES**

**Montgomery 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. Montgomery County has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons. The County Council has adopted the Montgomery County Title VI Policies on May 12, 2015. These Title VI Policies are included in Appendix G. The Title VI Policies include:

- A. Definitions for Fare Change, Major Service Change, Disparate Impacts, Disproportionate Burdens and Minority Route;
- B. Service Standards for vehicle load, vehicle headway, on-time performance and service availability;
- C. Service Policies related to distribution of transit amenities and vehicle assignment; and,
- D. Approval procedures for Fare Changes and Major Service Changes

In developing the Title VI Policies, the Division of Transit Services completed public involvement activities to solicit the opinions of affected parties and the general public. A description of these activities is included in Appendix H

Every three years Montgomery County completes a Title VI Compliance Monitoring Report which must be reviewed and approved by the County Council. The Title VI Compliance Monitoring Report dated August 2017 was reviewed and approved by the County Council on September 19, 2017.

### **FARE AND SERVICE CHANGES**

**Montgomery 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, **Montgomery 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.

Appendix H includes a table listing fare and service changes during the three year period 2015 to 2017.

## IX. APPENDICES

### ***Appendix A – Title VI Assurances, Policy and Notice***

#### DIVISION OF TRANSIT SERVICES STANDARD OPERATING PROCEDURE

##### **Department of Transportation**

Section:  <b>Ride On</b>	Title:  <b>Title VI Assurances, Policy and Notice</b>	Date:  <b>December 1, 2014</b>
Number:	Division Chief Signature:	Page:  <b>1 of 2</b>

#### **Background:**

As a condition of receiving federal transit grants, Montgomery County is required to comply with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B. These regulations require that Montgomery County provide Title VI Assurances, approve a Title VI Policy, develop a Title VI Program and update it every three years, and Notify Beneficiaries of Protection Under Title VI.

#### **Title VI Assurances:**

Montgomery County executes annually the Federal Transit Administration Certifications and Assurances which contain the current Title VI assurances.

#### **Montgomery County Title VI Policy Statement**

Montgomery County does not discriminate on the basis of based on race, color, sex, marital status, religious creed, ancestry, national origin, disability, sexual orientation, or gender identity in places of public accommodation, which includes public transportation.

Any person(s) who believe that have been subjected to unequal treatment because of race, color, sex, marital status, religious creed, ancestry, national origin, disability, sexual orientation or gender identify may file a formal complaint. Complaints may be filed within one hundred-eighty (180) days following the date of discriminatory action. Complaints may be filed with the Montgomery County Office of Human Rights.

Chapter 27 of the Montgomery County Code (2004), as amended, provides for investigations of complaints of discrimination or discriminatory practices by the Montgomery County Office of Human Rights and prosecution of cases found to have merit. A copy of Chapter 27 is available online at:

[http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:montgomeryco\\_md\\_mc](http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:montgomeryco_md_mc).

### **Montgomery County Title VI Program**

The Montgomery County Department of Transportation, Division of Transit Service (DTS) is responsible for management of the transit operation including transit grants and compliance. In completing its responsibilities, DTS maintains the Ride On Title VI Program which is updated every three years as required by FTA regulations.

### **Notice to Beneficiaries**

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, recipients 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, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

Montgomery County fulfills this requirement by:

1. Posting the Montgomery County Title VI Policy Statement on its web site including:
  - a. A statement that the agency operates programs without regard to race, color, or national origin.
  - b. A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations.
  - c. A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
2. Placing the poster below on all Ride On transit buses, at Ride On offices and operating facilities and at key transfer stations. A list of the posting locations is maintained by the Ride On Civil Rights Coordinator.

**NON-DISCRIMINATION POLICY**

We are committed to ensuring that no person is excluded from participation in or denied the benefits of the transit services we offer. This policy is consistent with the requirements of Title VI of the 1964 Civil Rights Act.

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

Complaints must be filed within one hundred-eighty (180) days following the date of the alleged discriminatory action. For more information, or to file a complaint, you must submit it in writing directly to the following:

**Montgomery County Office of Human Rights**  
21 Maryland Avenue, Suite 330  
Rockville, Maryland 20850  
Telephone: 240.777.8450  
Fax: 240.777.8460 · TTY: 240.777.8480  
human-rights.commission@montgomerycountymd.gov

**Federal Transit Administration  
Office of Civil Rights**  
Attention:  
Title VI Program Coordinator  
East Building, 5th Floor-TCR  
1200 New Jersey Ave. S.E.  
Washington DC 20590

**POLÍTICA PARA COMBATIR LA DISCRIMINACIÓN**

Nuestra agencia tiene un compromiso para asegurarse que ninguna persona sea excluida de la participación o se le nieguen los beneficios de transporte que ofrecemos. Esta política es consistente con los requisitos estipulados en El Título VI Del Acta De Los Derechos Civiles De 1964.

Si usted cree que ha sido objeto de trato desigual debido a su raza, color o nacionalidad, entonces usted tiene el derecho de someter una querrela formal.

Las querellas deben ser sometidas dentro de los ciento ochenta (180) días siguientes a la fecha que se alega se cometió la acción discriminatoria. Las querellas deben ser sometidas por escrito o por correo electronico al final de la pagina.

**Condado de Montgomery Oficina de Derechos Humanos**  
21 Maryland Avenue, Suite 330  
Rockville, Maryland 20850  
Teléfono: 240.777.8450  
Fax: 240.777.8460 · TTY: 240.777.8480  
human-rights.commission@montgomerycountymd.gov

Usted tiene que reportar a la Administración Federal de Transito a la siguiente direccion:  
**Oficina de Derechos Humanos**  
Atencion:  
Title VI Program Coordinator  
East Building, 5th Floor-TCR  
1200 New Jersey Ave. S.E.  
Washington DC 20590



## Appendix A – Title VI Notice Posting Locations

The Ride On Title VI notice has been posted at the following locations:

Montgomery County DOT, Division of Transit Services  
101 Monroe Street, 5th floor  
Rockville, Maryland 20850

Ride On Silver Spring Garage  
8710 Brookville Road  
Silver Spring, MD 20910

Ride On Nicholson Court Garage  
4925 Nicholson Court  
Kensington, MD 20895

David F. Bone Equipment Maintenance and Transit Operations Center (EMTOC)  
16840 Crabbs Branch Way  
Derwood, MD 20855

In addition to these posting locations, the notice has been placed on:

- 343 Ride On buses
- Montgomery County Department of Transportation web site at <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
- Ride On Twitter account at: <https://twitter.com/RideOnMCT>.
- Ride On Facebook account at: <https://www.facebook.com/RideOnMCT/info>.
- Posted in 3 newspapers (English and Spanish)
- Email blast via GovDelivery system

***Appendix B – Title VI Complaint Procedures and Form***

**DIVISION OF TRANSIT SERVICES**

**STANDARD OPERATING POLICY & PROCEDURE**

**Department of Transportation**

Section:  <b>Ride On</b>	Title:  <b>Title VI Complaint Procedures</b>	Date:  <b>December 1, 2014</b>
Number:	Division Chief Signature:	Page:  <b>1 of 3</b>

**BACKGROUND:**

It is Montgomery County's policy that any allegation of discrimination or unequal treatment on the basis of race, color or national origin should be thoroughly investigated as described in the procedure below.

As a federal requirement Montgomery County will comply with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B. These regulations require that Montgomery County have a process for receiving Title IV complaints that may allege discrimination or unequal treatment on the basis of race, color, or national origin.

**PROCEDURE:**

Complaints alleging discrimination or unequal treatment on the basis of race, color or national origin (referred to as "Complaint" in this procedure) must be received within 180 days of the alleged discrimination and may be received in four ways including 1) Written and delivered to Montgomery County offices, 2) Telephonically through MC311, 3) Electronically through email, Facebook or Twitter, and 4) In person at Montgomery County Offices or at public meetings sponsored by Montgomery County. The investigation procedure for each method of receiving a Title VI Complaint follows:

**Written Complaints**

1. The written Complaint is forwarded to Office of Human Rights and the Division of Transit Services Title VI Coordinator.
2. If a Title VI Complaint Form has not been completed, a copy of the form is mailed to the Complainant.
3. The completed Title VI Complaint Form is mailed directory to the Office of Human Rights.



#### Telephone Complaints through MC311

1. Telephone Complaints are recorded in the Customer Service database.
2. The complainant is informed by the call taker that they may file a formal Title VI Complaint. If the complainant wants to file a formal Complaint they are referred to the website to download a Title VI Complaint Form or a Title VI Complaint Form is mailed to the complainant.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights. A copy of the Complaint as recorded in the Customer Service database is forwarded to the Division of Transit Services Title VI Coordinator.
4. If the caller does not wish to file a formal Title VI complaint, the Complaint is forwarded to Ride On Operations for normal processing. A copy of the Complaint as recorded in the Customer Service database is also forwarded to the Division of Transit Services Title VI Coordinator.

#### Electronic Complaints

1. Electronic complaints received through email, Facebook or Twitter are forwarded to the Division of Transit Services Title VI Coordinator.
2. The Division of Transit Services Civil Rights Coordinator replies to the electronic message and informs the complainant that they may file a formal Title VI Complaint as described at: <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights.

#### In-person Complaints

1. If a Complaint is made in person at a County office or at a public meeting, the County employee receiving the Complaint will record the contact information for the complainant and the nature of the Complaint. This information will be forwarded to the Division of Transit Services Title VI Rights Coordinator.
2. The Division of Transit Services Title VI Coordinator replies to the complainant and informs them that they may file a formal Title VI Complaint as described at: <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights.

#### Record of Complaints

Upon receipt of a Title VI Complaint Form, the Division of Transit Services Title VI Coordinator transmits a copy of the complaint form to MTA within three business days of receiving the completed complaint form. The Division of Transit Services Title VI Coordinator is responsible for maintaining a list of Title VI Complaints. The list shall include:

- a. Date received
- b. Type of Complaint (formal or informal)
- c. Complainant Name

- d. Contact Information
- e. Nature of Complaint
- f. Date Title VI Complaint Form received by the Office of Human Rights
- g. Response Date by the Office of Human Rights
- h. Description of the Decision by the Office of Human Rights
- i. Date of Decision by the Office of Human Rights

Complaint Investigation - Office of Human Rights

Once a Title VI Complaint Form is received by the Office of Human Rights it is assigned to an investigator. The investigator will contact the complainant in writing and/or by telephone. Additional information or clarification may be requested by the investigator.

Based upon receipt of all the information required, the Office of Human Rights will investigate a Title VI complaint within 90 days of receipt. The Office of Human Rights will provide a final response to the complainant, including notifying the complainant of his/her right to file a Complaint externally.

The Office of Human Rights will use its best efforts to respond to a Title VI complaint within 90 calendar days of its receipt of such complaint. Receipt of additional relevant information and/or simultaneous filing of Complaint with Montgomery County and an external entity may expand the timing of the Complaint resolution. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the Complaint or a delay in Complaint resolution.

**TITLE VI COMPLAINT FORM**  
**Montgomery County Department of Transportation**  
**Division of Transit Services**

Montgomery County is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Office of Human Rights Enforcement Manager by calling (240) 777-8450. The completed form must be returned to the Montgomery County Office of Human Rights, 21 Maryland Avenue, Suite 330, Rockville, MD 20850.

*(Please print)*

<b>Section I:</b>	
Name:	
Address:	
Telephone (Home):	Telephone (Work):
Electronic Mail Address:	
Accessible Format Requirement? <input checked="" type="radio"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other (specify)	

<b>Section II:</b>	
Are you filing this complaint on your own	<input checked="" type="radio"/> Yes* (if yes, go to Section III) <input type="checkbox"/> No
If not, please supply the name and relationship of the person for who you are filing the complaint.	
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.	<input checked="" type="radio"/> Yes <input type="checkbox"/> 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"/> Other (specify)
Date of the 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 for any witnesses. If more space is needed, please use the back of

*Complete reverse side of form*

<b>Section V:</b>	
Have you filed this complaint with any other Federal, State, or local agency or with any Federal or State	<input checked="" type="radio"/> Yes <input type="radio"/> No
If you have filed this complaint with another entity, please provide the information below:	
Agency:	Contact Name:
Address:	Telephone Number:

Agency:	Contact Name:
Address:	Telephone Number:

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Date \_\_\_\_\_

26

### ***Appendix C – Description of Title VI Investigations, Lawsuits and Complaints***

During the period January 1, 2015 through December 31, 2017 there were no Title VI Investigations, or Lawsuits. There were two Complaints to report.

	<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>No investigations during the period January 1, 2014 to December 31, 2017</b>			
1.				
<b>Lawsuits</b>	<b>No lawsuits during the period January 1, 2014 to December 31, 2017</b>			
1.				
<b>Complaints</b>	<b>Two complaints during the period January 1, 2014 to December 31, 2017</b>			
1.	9/7/2016	Customer complained the passenger on various buses refuse to listen to the operator to get up from the seats reserved for disability. She stated the Metro Q6 bus operator asked passengers not to sit in the disability reserve seats but customers are not listening.	Referred to Office of ADA	No Action Taken (Metrobus Service)
2.	9/23/2016	Muslim woman not allowed on Ride-on bus. I gave caller my number to give to the woman so she can call me and file a complaint.	Complaint should come from the person directly. No response	No Action Taken

## ***Appendix D – Summary of Public Outreach Activities***

### **PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES**

<b>Meetings/Event</b>	<b>Locations</b>	<b>Date &amp; Time</b>	<b>Attendees (approximate)</b>
<b>FY15</b>			
Customer Appreciation Day	Lake Forest & Germantown TC's	June 26; 4:30 - 6:30 pm	750
Customer Appreciation Day	Silver Spring IOS	July 29; 4:30 - 6:30 pm	400
MCPS Back-To-School Fair	Rockville	August 28; 11 am - 2 pm	3000
MC Agricultural Fair	Gaithersburg	August 13-21; 10 am - 10 pm	2000
Customer Appreciation Day	Takoma Park Metro Station	September 18; 4:30 - 6:30 pm	500
Customer Appreciation Day	Glenmont Metro Station	October 12; 4:30 - 6:30 pm	400
Senior Outreach with WMATA	Leisure World, Silver Spring	March 13; 2 - 4:30 pm	200
H2O GreenFest	Takoma Park	March 28; 10 am - 2 pm	60
Give And Ride Food Campaign	On All Buses	April 19-25; all hours of service	8700
Customer Appreciation Day	Bethesda Metro Station	May 12; 4:30 - 6:30 pm	500
Customer Appreciation Day	Shady Grove Metro Station	May 13; 4:30 - 6:30 pm	500
Customer Appreciation Day	White Oak Transit Center	May 14; 4:30 - 6:30 pm	500
Senior Outreach	Holiday Park Senior Ctr, Kensington	June 10; 12 - 3 pm	100
Transportation Day	Trolley Museum Silver Spring	June 13; Noon – 3 pm	75
Dump the Pump	Gaithersburg/Bethesda/Silver Spring	June 18; 9 am - 3 pm	100
Customer Appreciation Day	Wheaton Metro Station	June 25; 4:30 - 6:30 pm	<u>400</u>
			18185
<b>FY16</b>			
Customer Appreciation Day	Rockville Metro Station	July 30; 4:30 - 6:30 pm	400
MC Agricultural Fair	Gaithersburg	August 14-22; 10 am - 10 pm	2000
Twinbrook Movie Night w/WMATA	Twinbrook Metro Station	August 22; 5:45 - 9 pm	100
Silver Spring Trpt Mgmt District	Discovery Communications Bldg	August 23; 8:30-10 am	25
Silver Spring Urban District	Monthly Meeting at Firehouse	August 24; 3:30-5 pm	30
Customer Appreciation Day	White Flint Metro Station	August 27; 4:30 - 6:30 pm	250
MCPS Back-To-School Fair	Rockville	August 29; 11 am - 2 pm	2500
Opening of Silver Spring Transit Center	Silver Spring Transit Center	TBD; 4:30 - 6:30 pm	250
Customer Appreciation Day	Friendship Heights Metro Station	September 24; 4:30 - 6:30 pm	200
Customer Appreciation Day	Medical Center Metro Station	October 29; 4:30 - 6:30 pm	250
Senior Outreach with WMATA	Leisure World, Silver Spring	March 13; 2 - 4:30 pm	75
H2O GreenFest	Takoma Park	March 28; 10 am - 2 pm	300
Popular Run HOA Meeting	Popular Run Community Center	March 30; 7-8:30 pm	35



Montgomery County  
Title VI Implementation Plan 2018 to 2020

Meetings/Event	Locations	Date & Time	Attendees (approximate)
Summerfield Crossing HOA Meeting	Rocky Hill Middle School	April 18; 6-8 pm	75
Give And Ride	On All Buses	April 19-25; all hours of service	6600
Sara Tenebaum, MCG; Give-Aways	Tikvat Israel Pres-School at 2200 Baltimore Rd, Rockville	April 28; 10-11 am	60
Mike Nesselt	Matsunaga Elementary School Career Day	April 28; 10-11 am	25
Wyngate HOA President Meeting	Wyngate HOA Community Day flyers	April 30; 1-4 pm	50
MC African American Health Day	Argyle Middle School	April 30; 10 am - 2 pm	100
Customer Appreciation Day	Bethesda Metro Station	May 12; 4:30 - 6:30 pm	250
Customer Appreciation Day	Shady Grove Metro Station	May 13; 4:30 - 6:30 pm	300
Customer Appreciation Day	White Oak Transit Center	May 14; 4:30 - 6:30 pm	250
Senior Outreach	Holiday Park Senior Ctr, Kensington	June 10; 12 - 3 pm	75
Dump the Pump	Gaithersburg/Bethesda/Silver Spring	June 18; 9 am - 3 pm	300
Customer Appreciation Day	Wheaton Metro Station	June 25; 4:30 - 6:30 pm	<u>250</u>
			14750
<b>FY17</b>			
Customer Appreciation Day	Forest Glen Metro Station	July 23; 4:30-6:30	200
MC Agricultural Fair	Booth on Main Street	August 8-18	2000
Silver Spring Citizens Advisory Group	Silver Spring Civic Building	August 24; 7-8 pm	40
Customer Appreciation Day	Grosvenor Metro Station	August 26; 4:30-6:30	300
Christ Episcopal School	sent collateral materials	August 27; 9-10 am	25
Victory Christian Church International (African/African American) August 26th, 30 people	staffed table at their Community Day	August 26; 6-8 pm	50
Seneca Valley School Cluster Day	Back-To-School Fair	August 27; 10 am - 2 pm	300
Customer Appreciation Day	Twinbrook Metro Station	August 26; 4:30-6:30	500
Customer Appreciation Day	Lakeforest Transit Center	September 22; 4:30-6:30	300
Route 301 Soft Launch	Tobytown Community Center	October 2; 7 am - Noon	30
Customer Appreciation Day	Germantown Transit Center	October 27; 4:30-6:30	300
Youth Transitioning Fair	Takoma Park	October 8; 2-14 pm	75
Impact Silver Spring Meeting	East County Community Center	October 27; 10-11 am	10
East County Community Village Senior Citizens meeting	East County Community Center	November 7; 7-8 pm	15
Ride On extRa soft launch	Medical Ctr Metro Station	April 10th; 4:30-6:30 pm	150
Ride On extRa soft launch	Lakeforest Transit Ctr	April 11th; 4:30-6:30 pm	150
Give And Ride	On All Buses	April 19-25; all hours of service	6000

Montgomery County  
Title VI Implementation Plan 2018 to 2020

Meetings/Event	Locations	Date & Time	Attendees (approximate)
Bike To Work Day	Dawson's Market, Rockville	May 19; 6-9 am	100
GreenFest	Bohrer Park, Gaithersburg	May 6th; 10 am - 4 pm	300
Customer Appreciation Day	White Oak Transit Center	June 29; 4:30-6:30 pm	<u>300</u>

***Appendix E – Language Assistance Plan***

***Appendix F – Minority Representation on Ride On Advisory Committees – August 2017***

<b>Committee</b>	<b>Black or African American</b>	<b>White/Caucasian</b>	<b>Latino/Hispanic</b>	<b>American Indian or Alaska Native</b>	<b>Asian</b>	<b>Native Hawaiian or other Pacific Islander</b>	<b>Other <i>*Note</i></b>	<b>Totals</b>
<b>Transit Advisory Group (TAG)</b>	<b>8</b>	<b>10</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>21</b>
<b>% of CAC Committee</b>	<b>38%</b>	<b>47%</b>	<b>5%</b>	<b>0%</b>	<b>5%</b>	<b>0%</b>	<b>5%</b>	<b>100%</b>

***\*Note – Other races reported: African and Middle Eastern***

## ***Appendix G – Title VI Policies***

### **Montgomery County Title VI Policies**

Federal Transit Administration (FTA) Circular 4702.1B requires grantees that operate more than 50 peak hour vehicles establish Title VI policies providing:

- A. Definitions for Fare Change, Major Service Change, Disparate Impacts, Disproportionate Burdens and Minority Route;
- B. Service Standards for vehicle load, vehicle headway, on-time performance and service availability;
- C. Service Policies related to distribution of transit amenities and vehicle assignment; and,
- D. Approval procedures for Fare Changes and Major Service Changes

These Definitions, Service Standards, Service Policies and Approval Procedures must be approved by the County Council.

#### **DEFINITIONS**

1. Fare Change - A Fare Change is any change in fare or new fare product regardless of the amount of increase or decrease. Except for the circumstances listed below, a Fare Equity Analysis is required for any Fare Change to evaluate the effects of a Fare Change on low-income and Title VI-protected populations.

##### Exceptions.

- i. “Give and Ride” and/or special events where Montgomery County has decided that all passengers ride free.
  - ii. Temporary fare reductions that are mitigating measures for other actions such as free or reduced fare due to construction activities.
  - iii. Promotional fare reductions that last less than six months.
2. Major Service Change - A Major Service Change is any new route or a reduction or increase in a route’s revenue vehicle hours greater than 25% of the prior schedule’s revenue vehicle hours. A Service Change Equity Analysis is required for any Major Service Change to evaluate the effects of the proposed service change on low-income and Title VI-protected populations.
3. Disparate Impact - For Major Service Changes, a disparate impact may exist when the minority population adversely affected by a Major Service Change is twenty percent (20%) more than non-minority population adversely affected by the Major Service Change. For a Fare Change, a disparate impact may exist if the difference between the average fare increase (represented as a % change) for minority populations and the average fare increase (represented as a % change) for non-minority populations is greater than 5% (percentage points). For example, if the average fare increase on minority riders

was 10% and the average fare increase on non-minority riders was 4%, the difference is greater than 5% and would be considered disparate.

4. **Disproportionate Burden** - For Major Service Changes, a disproportionate burden may exist when the low income population adversely affected by a Major Service Change is twenty percent (20%) more than non-low income population adversely affected by the Major Service Change. For a Fare Change, a disproportionate burden may exist if the difference between the average fare increase (represented as a % change) for low-income populations and the average fare increase (represented as a % change) for non-low income populations is greater than 5% (percentage points). For example, if the average fare increase on low income riders was 10% and the average fare increase on non-low income riders was 4%, the difference is greater than 5% and would be considered disproportionate.
5. **Minority Route** - A Minority Route is a route that serves an area with a population with a higher percentage of minorities than the Montgomery County average as determined by the most recent and available US Census. Using Geographic Information Systems (GIS), the total population and minority population residing within ¼ of a mile of a bus route are tabulated except for express routes where the service area is 1 mile from the park and ride lot or transfer center.

### **SERVICE STANDARDS**

<b>Standard</b>	<b>Definition</b>	<b>Calculation</b>
Vehicle Load	Average ratio of passengers per seat per bus during a service hour at the maximum load point	Peak period maximum load factor of 1.2 on regular routes and 1.0 on express routes. Off-peak service maximum load factors of 1.0 on all service types.
Headway	Maximum scheduled time interval between buses	Maximum 30 minutes peak headway during peak and off-peak periods.
Schedule Adherence	Percent adherence to scheduled service.	Goal 85 % on time performance for delivered trips, difference between scheduled time and actual time arriving at a time point based on a window of no more than 2 minutes early or 7 minutes late.
Service Coverage	Traffic Analysis Zones (TAZ) that have 3+ households per acre and/or 4+ jobs per acre are served by Ride On and / or Metro Bus routes.	Using the most recent data, TAZs meeting the threshold are analyzed for the presence of Ride On and / or Metro Bus service.

### **SERVICE POLICIES**



Service Policy	Montgomery County Policy
Vehicle Assignment	Vehicles are assigned to routes based on ridership demands, road conditions, service type, and maintenance garage capacity and vehicle technologies (e.g., CNG fueling only provided at EMTOC).
Distribution of Transit Amenities	Ride On will equitably provide amenities such as shelters and kneewalls at bus stops where Ride On has decision-making authority.

### **APPROVAL PROCEDURES**

1. Fare Change - The Division of Transit Services Office of Planning and Implementation will be responsible for completing the Fare Change Equity Analysis and the Division of Transit Services Marketing Office will be responsible for conducting and documenting the public involvement activities. Upon completion of the Fare Change Equity Analysis and the required public involvement, the Montgomery County Council will follow its procedures in reviewing and approving the Fare Change. The County's public meetings conducted as part of the overall budget approval process will provide the public involvement activities required for fare change proposals that are considered as a part of the Council's annual budget. Additional public meetings may be conducted by the Montgomery County Council.
2. Major Service Change – The Division of Transit Services Office of Planning and Implementation is responsible for developing service changes and will identify any service change that meets the definition of Major Service Change. For each Major Service Change, the Division of Transit Services Office of Service Planning will complete a Major Service Change Equity Analysis. The Division of Transit Services Marketing Office will conduct and document the public involvement required for Major Service Changes consistent with Ride On's Public Participation Plan. Upon completion of the Major Service Change Equity Analysis and the required public involvement, the Montgomery County Council will follow its procedures in reviewing and approving the Major Service Change. The County's public meetings conducted as part of the overall budget approval process will provide the public involvement activities required for Major Service change proposals that are considered as a part of the Council's annual budget. Additional public meetings may be conducted by the Montgomery County Council.

***Appendix H – Fare and Major Service Changes – 2015 to 2017***

***All Major service changes are documented beginning on  
page 37***

Service Change			Description o f Service Change	Revenue Hours	Revenue Hours	% Change	Major	Public	Equity
Date	Routes	Service		Before Change	After Change		Service	Meeting	Analysis
Jan-15							Change		Completed
	8	Sat	Running Time (RT), Span of Service, Routing Change Time of Day	35.7	40.4	13.17%	No	No	No
	23	Sat	Running Time, Span of Service	24.8	26.3	6.05%	No	No	No
	28	Sat	New-Span of Service, Frequency Reduction	-	42.6		No	No	No
	38	Sat	Running Time, Routing Change Time of Day	33.3	39.6	18.92%	Yes	Yes	Yes
	43	Sat	Span of Service	25.3	30.3	19.76%	No	No	No
	48	Sat	Running Time, Span of Service	46.6	49.2	5.58%	No	No	No
	83	Sat	Running Time, Trip time changes, Frequency Reduction	32.4	34.1	5.25%	No	No	No
	98	Sat	Trip time changes	49.7	47.8	-3.82%	No	No	No
	1	Sun	RT	29.5	34.5	16.95%	No	No	No
	38	Sun	Running Time, Routing Change Time of Day	28.4	39.1	37.68%	Yes	Yes	Yes
	54	Sun	Span of Service	40.1	41.2	2.74%	No	No	No
	83	Sun	Running Time, Trip time changes, Frequency Reduction	32.4	33.3	2.78%	No	No	No
	98	Sun	Trip time changes	45.2	44.8	-0.88%	No	No	No
	1	Wkdy	RT	45.1	46.3	2.66%	No	No	No
	7	Wkdy	Span of Service	4.0	4.9	22.50%	No	No	No
	8	Wkdy	Running Time, Span of Service, Routing Change Time of Day	41.4	43.7	5.56%	No	No	No
	11	Wkdy	Running Time, Span of Service	20.0	20.6	3.00%	No	No	No
	13	Wkdy	Span of Service	12.1	13.4	10.74%	No	No	No
	20	Wkdy	Schedule Correction	89.3	90.4	1.23%	No	No	No
	23	Wkdy	Running Time, Span of Service	28.8	33.5	16.32%	No	No	No
	24	Wkdy	Running Time, Span of Service	8.1	10	23.46%	No	No	No
	25	Wkdy	Span of Service	21.9	25.8	17.81%	No	No	No
	28	Wkdy	Span of Service, Frequency Reduction	35.7	39.1	9.52%	No	No	No
	31	Wkdy	All to NC	9.9	11.9	20.20%	No	No	No
	33	Wkdy	Running Time, Span of Service	21.8	26.1	19.72%	No	No	No
	37	Wkdy	Route Changes Garage	19.3	19.9	3.11%	No	No	No
	38	Wkdy	Running Time, Routing Change Time of Day	41.0	46.4	13.17%	Yes	Yes	Yes
	39	Wkdy	RT-Span of Service, Route Changes Garage	12.2	17.3	41.80%	No	No	No
	43	Wkdy	Span of Service	36.5	40.6	11.23%	No	No	No
	48	Wkdy	Running Time, Span of Service	63.7	65	2.04%	No	No	No
	51	Wkdy	All to SS	13.8	15.8	14.49%	No	No	No
	54	Wkdy	Span of Service	69.7	71.8	3.01%	No	No	No
	63	Wkdy	Running Time, Routing Change Time of Day	29.3	36.7	25.26%	No	No	No
	65	Wkdy	Span of Service	4.9	6.3	28.57%	No	No	No
	66	Wkdy	Running Time, Span of Service	5.3	6.6	24.53%	No	No	No
	67	Wkdy	Running Time, Span of Service	7.3	9.4	28.77%	No	No	No
	74	Wkdy	Running Time, Span of Service	49.4	56.3	13.97%	No	No	No
	76	Wkdy	Running Time	41.1	42.6	3.65%	No	No	No
	83	Wkdy	Running Time, Trip time changes, Frequency Reduction	47.2	50.6	7.20%	No	No	No

Service Change				Revenue Hours	Revenue Hours		Major		Equity
Date	Routes	Service	Description o f Service Change	Before Change	After Change	% Change	Service	Public	Analysis
	96	Wkdy	Running Time, Span of Service	27.1	27.8	2.58%	No	No	No
	98	Wkdy	Trip time changes	57.2	54.4	-4.90%	No	No	No
Sep-14									
	16	Sat	RT	101.8	105.9	4.03%	No	No	No
	26	Sat	RT	85.0	84.9	-0.12%	No	No	No
	43	Sat	RT	25.3	30.3	19.76%	No	No	No
	56	Sat	RT-Span-Trips times	62.7	63.5	1.28%	No	No	No
	61	Sat	RT	66.1	66.4	0.45%	No	No	No
	83	Sat	Extend to Hosp	32.4	34.1	5.25%	Yes	Yes	Yes
	16	Sun	RT	93.9	96.7	2.98%	No	No	No
	26	Sun	RT	88.1	85.6	-2.84%	No	No	No
	56	Sun	RT-Span-Trips times	54.8	58.1	6.02%	No	No	No
	61	Sun	RT	60.6	61.4	1.32%	No	No	No
	83	Sun	Extend to Hosp	32.4	33.3	2.78%	Yes	Yes	Yes
	16	Wkdy	RT	111.4	112.5	0.99%	No	No	No
	25	Wkdy	Ops DH-trips reduced	21.9	25.8	17.81%	No	No	No
	26	Wkdy	RT	116.5	113.5	-2.58%	No	No	No
	43	Wkdy	RT	36.6	40.6	10.93%	No	No	No
	58	Wkdy	RT	57.8	57.2	-1.04%	No	No	No
	61	Wkdy	RT	80.7	82.2	1.86%	No	No	No
	70	Wkdy	Trips added AM	47.2	47.9	1.48%	No	No	No
	83	Wkdy	Extend to Hosp	47.2	50.6	7.20%	Yes	Yes	Yes
	90	Wkdy	RT-Ops layover	52.9	54	2.08%	No	No	No

Service Change Date	Routes	Service	Description o f Service Change	Revenue Hours Before Change	Revenue Hours After Change	% Change	Major Service Change	Public Meeting	Equity Analysis Completed
May-16									
	ALL	All	Westfield Montgomery Mall TC opens				No	No	No
	1	Sat	Bay change SSTC	38.4			No	No	No
	2	Sat	Bay change SSTC	19.7			No	No	No
	29	Sat	Running Time (RT), 35 min headway	18.2			No	No	No
	46	Sat	RT, reduced late eve	88.7			No	No	No
	57	Sat	RT	54.1			No	No	No
	59	Sat	RT	78.3			No	No	No
	64	Sat	RT	41			No	No	No
	1	Sun	Bay change SSTC	34.5			No	No	No
	2	Sun	Bay change SSTC	19			No	No	No
	29	Sun	RT	15.1			No	No	No
	46	Sun	RT, modest span	85.7			No	No	No
	57	Sun	RT	45.7			No	No	No
	59	Sun	RT-modest span	72			No	No	No
	64	Sun	RT	39.6			No	No	No
	1	Wkdy	Bay change SSTC	46.3			No	No	No
	2	Wkdy	Bay change SSTC	28.6			No	No	No
	3	Wkdy	Bay change SSTC	2.8			No	No	No
	4	Wkdy	RT	18			No	No	No
	11	Wkdy	Bay change SSTC	20.6			No	No	No
	23	Wkdy	Add late evening trip	33.5			No	No	No
	29	Wkdy	RT, remove goespatial, leave time BS	42.9			No	No	No
	31	Wkdy	RT	11.9			No	No	No
	37	Wkdy	RT	19.9			No	No	No
	44	Wkdy	RT	9.4			No	No	No
	46	Wkdy	RT, reduced late eve	119.9			No	No	No
	54	Wkdy	Trip time changes-Research	71.8			No	No	No
	57	Wkdy	RT	68.7			No	No	No
	59	Wkdy	RT-reduced 1 trip	105.3			No	No	No
	63	Wkdy	Trip time changes-Research	36.7			No	No	No
	64	Wkdy	RT	50.6			No	No	No
	75	Wkdy	RT-modest span	27.6			No	No	No
	81	Wkdy	RT	15.8			No	No	No
Jan-16									
	8	Sat	Shift WH trips	40.4	41.4	2.5%	No	No	No
	9	Sat	RT and trip time changes to minimal layover at WH	38.1	42.8	12.3%	No	No	No
	14	Sat	Ramsey to Bonifant routing	23.3	26.1	12.0%	No	No	No
	15	Sat	Ramsey to Bonifant routing	60.1	63	4.8%	No	No	No
	16	Sat	Ramsey to Bonifant routing	105.9	105.8	-0.1%	No	No	No
	20	Sat	Ramsey to Bonifant routing	66.4	68.8	3.6%	No	No	No
	23	Sat	RT and trip time changes for layover at SY	26.3	28.2	7.2%	No	No	No
	28	Sat	RT correction	42.6	42.2	-0.9%	No	No	No
	34	Sat	RT and trip time changes to minimal layover at WH	61.7	65.5	6.2%	No	No	No

Service Change	Routes	Service	Description o f Service Change	Revenue Hours Before Change	Revenue Hours After Change	% Change	Major Service Change	Public Meeting	Equity Analysis Completed
	42	Sat	Span elimination before 830a and after 700p	45.7	35.4	-22.5%	Yes	Yes	Yes
	47	Sat	RT	61	58.5	-4.1%	No	No	No
	83	Sat	Span elimination before 830a and after 700p	34.1	26.9	-21.1%	No	No	No
	97	Sat	RT	16.4	16.2	-1.2%	No	No	No
	98	Sat	Span elimination before 830a and after 700p	47.8	32.6	-31.8%	No	No	No
	9	Sun	RT and trip time changes to minimal layover at WH	35.2	36.1	2.6%	No	No	No
	15	Sun	Ramsey to Bonifant routing	49.6	46.2	-6.9%	No	No	No
	16	Sun	Ramsey to Bonifant routing	96.7	97.3	0.6%	No	No	No
	20	Sun	Ramsey to Bonifant routing	57.3	58.7	2.4%	No	No	No
	34	Sun	RT and trip time changes to minimal layover at WH	63.9	63.5	-0.6%	No	No	No
	38	Sun	RT adjsutment	39.1	35.4	-9.5%	No	No	No
	42	Sun	Eliminated	40.4	0	-100.0%	No	No	No
	47	Sun	RT	55.3	54.7	-1.1%	No	No	No
	83	Sun	Eliminated	33.3	0	-100.0%	Yes	Yes	Yes
	97	Sun	RT	15.2	14.9	-2.0%	No	No	No
	98	Sun	Eliminated	44.8	0	-100.0%	Yes	Yes	Yes
	3	Wkdy	RT and trip time changes to allow the 1 bus cycle to work	2.8	3.1	10.7%	No	No	No
	9	Wkdy	RT and trip time changes to minimal layover at WH	52.5	47.9	-8.8%	No	No	No
	14	Wkdy	Ramsey to Bonifant routing-adjust Eastern MS trip for Bell time changes	34.4	34.5	0.3%	No	No	No
	15	Wkdy	Ramsey to Bonifant routing	70.3	71.3	1.4%	No	No	No
	16	Wkdy	Ramsey to Bonifant routing	112.5	115.2	2.4%	No	No	No
	19	Wkdy	Ramsey to Bonifant routing	7.9	8.1	2.5%	No	No	No
	20	Wkdy	Ramsey to Bonifant routing	90.4	86	-4.9%	No	No	No
	23	Wkdy	RT and trip time changes for layover at SY	33.5	35.8	6.9%	No	No	No
	28	Wkdy	RT correction, new peak period headway	39.1	34.6	-11.5%	No	No	No
	32	Wkdy	RT and headway changes to allow the 2 bus cycle	14.4	16.1	11.8%	No	No	No
	34	Wkdy	RT and trip time changes to minimal layover at WH	90.5	89.7	-0.9%	No	No	No
	42	Wkdy	Span elimination after 800p	49.9	42.6	-14.6%	No	No	No
	45	Wkdy	Adjust 725a trip for Bell time changes	56.5	56.4	-0.2%	No	No	No
	47	Wkdy	RT	68.8	67.7	-1.6%	No	No	No
	53	Wkdy	RT, headway and span-headway reduction to allow the 4 bus cycle	33.1	33.7	1.8%	No	No	No
	97	Wkdy	RT	28.8	27.5	-4.5%	No	No	No
	98	Wkdy	Span elimination after 800p-add GCC trip for Bell time changes	54.4	47.6	-12.5%	No	No	No
Oct-15	ALL	All	SSTC opens Oct 2015				No	No	No
Sep-15									
	1	Sat	RT, R&S add wkdy	38.4	38.9	1.3%	No	No	No
	5	Sat	Generally redistribute-all to SS	55.4	61.6	11.2%	No	No	No
	8	Sat	RT	40.4	41.4	2.5%	No	No	No
	10	Sat	Generally add PM, reduce AM, redistribute throughout Wkdy, add Sat & Sun	67.5	68.2	1.0%	No	No	No
	14	Sat	Generally add peak period RT, reduce off-peak	23.3	26.1	12.0%	No	No	No
	16	Sat	Add 3 mins for TLTC, generally redistribute	105.9	105.8	-0.1%	No	No	No
	20	Sat	Generally redistribution	66.4	68.8	3.6%	No	No	No
	23	Sat	Move to SS	26.3	28.2	7.2%	No	No	No
	26	Sat	Generally add RT with redistribution	84.9	90.5	6.6%	No	No	No



Service Change				Revenue Hours Before	Revenue Hours		Major Service	Public	Equity Analysis
Date	Routes	Service	Description o f Service Change	Change	After Change	% Change	Change	Meeting	Completed
	28	Sat	Generally add-adjstments in blocking	42.6	42.2	-0.9%	No	No	No
	55	Sat	Generaly add RT with redistribution	148.7	158.4	6.5%	No	No	No
	56	Sat	Generally add RT with redistribution	63.5	65.2	2.7%	No	No	No
	57	Sat	Change trips times for interlining	54.1	58.8	8.7%	No	No	No
	58	Sat	Change trips times for interlining-RT correction midday wknds	38.9	42.8	10.0%	No	No	No
	59	Sat	Change trips times for interlining	78.3	78	-0.4%	No	No	No
	64	Sat	Change trips times for interlining	41	46	12.2%	No	No	No
	98	Sat	RT	47.8	32.6	-31.8%	No	No	No
	1	Sun	Generally redistribution, R&S add wkdy	34.5	35.8	3.8%	No	No	No
	5	Sun	RT-all to SS	55.4	59.3	7.0%	No	No	No
	10	Sun	Generally add PM, reduce AM, redistribute throughout Wkdy, add Sat & Sun	59.2	60.8	2.7%	No	No	No
	16	Sun	Add 3 mins for TLTC, generally redistribute	96.7	97.3	0.6%	No	No	No
	20	Sun	RT	57.3	58.7	2.4%	No	No	No
	26	Sun	Generally add RT with redistribution	85.6	91.5	6.9%	No	No	No
	55	Sun	Generaly add RT with redistribution	80.2	81.7	1.9%	No	No	No
	56	Sun	Generally add RT with redistribution	58.1	57.6	-0.9%	No	No	No
	58	Sun	Change trips times for interlining-RT correction midday wknds	35.8	41.8	16.8%	No	No	No
	98	Sun	RT	44.8	44.8	0.0%	No	No	No
	1	Wkdy	RT, R&S add wkdy	46.3	47.9	3.5%	No	No	No
	5	Wkdy	RT-all to SS	81.7	79.8	-2.3%	No	No	No
	8	Wkdy	Generally redistribution wkdy	43.7	43.3	-0.9%	No	No	No
	9	Wkdy	Trip time changes in PM	52.5	47.9	-8.8%	No	No	No
	10	Wkdy	Generally add PM, reduce AM, redistribute throughout Wkdy, add Sat & Sun	85.9	87.9	2.3%	No	No	No
	14	Wkdy	Generally add peak period RT, reduce off-peak	34.4	34.5	0.3%	No	No	No
	15	Wkdy	Reduce PM trips	70.3	71.3	1.4%	No	No	No
	16	Wkdy	Add 3 mins for TLTC, generally redistribute	112.5	115.2	2.4%	No	No	No
	19	Wkdy	RT	7.9	8.1	2.5%	No	No	No
	20	Wkdy	RT	90.4	86	-4.9%	No	No	No
	22	Wkdy	RT, added 1 AM and 2 PM reverse	23	27.5	19.6%	No	No	No
	26	Wkdy	Generally add RT with redistribution	113.5	113.2	-0.3%	No	No	No
	28	Wkdy	Generally add-adjstments in blocking	39.1	34.6	-11.5%	No	No	No
	30	Wkdy	All to SS	39.6	41.3	4.3%	No	No	No
	55	Wkdy	Generally add RT with redistribution	186.7	192.7	3.2%	No	No	No
	56	Wkdy	Generally add RT with redistribution	85.3	89	4.3%	No	No	No
	60	Wkdy	Genrally add RT	9.2	10.7	16.3%	No	No	No
	70	Wkdy	Genrally add RT	47.9	46.9	-2.1%	No	No	No
	98	Wkdy	RT	54.4	47.6	-12.5%	No	No	No

Change				Revenue	Revenue		Major		Equity
Date	Route	Service	Change	Hours	Hours	% Change	Service	Public	Analysis
Before				Change	After		Change	Meeting	Completed
Change									
May-17									
	5	Sat	Running Time (RT)	57.4			No	No	No
	15	Sat	LAST TRIP BACK 5 MINS	64.2			No	No	No
	20	Sat	RT	68.8			No	No	No
	43	Sat	RT-span improvement	28.1			No	No	No
	48	Sat	RT-reduce midday	50.8			No	No	No
	55	Sat	Change RE Lv times to match wkdy	148.2			No	No	No
	56	Sat	RT	64.9			No	No	No
	58	Sat	RT, early trip time change for headway	38.1			No	No	No
	74	Sat	New	0			No	No	No
	15	Sun	LAST TRIP BACK 5 MINS	51			No	No	No
	20	Sun	RT	58.8			No	No	No
	48	Sun	RT	38.3			No	No	No
	56	Sun	RT	60.3			No	No	No
	58	Sun	RT	38.1			No	No	No
	15	Wkdy	LAST TRIP BACK 5 MINS	78.6			No	No	No
	20	Wkdy	RT	87.9			No	No	No
	33	Wkdy	Conn Ave Estates	28.4			Yes	Yes	Yes
	43	Wkdy	RT-peak reduction, span improvement	41.6			No	No	No
	48	Wkdy	RT	69.1			No	No	No
	55	Wkdy	Earlier start SB, reduce midday short turn-add 1 RT LF NB, SW SB, adjst PM OB tri	186.7			No	No	No
	56	Wkdy	RT-REMOVE PSTA, trim a few trips (20-25)	89.2			No	No	No
	58	Wkdy	RT-snouffer school, reduce 25 min	57			No	No	No
	60	Wkdy	RT	10.9			No	No	No
	61	Wkdy	Earlier start SB	79.9			No	No	No
	63	Wkdy	RT	38.1			No	No	No
	66	Wkdy	RT-modify pm trip times	7.6			No	No	No
	67	Wkdy	RT	8.7			No	No	No
	71	Wkdy	RT	11.7			No	No	No
	73	Wkdy	New Clarksburg-Cabin Branch, Old Balt	0			Yes	Yes	Yes
	74	Wkdy	RT	54.9			No	No	No
	75	Wkdy	RT-clarksburg, (span 930p-no change for May 2017)	31.3			Yes	Yes	Yes
	78	Wkdy	RT	12.5			No	No	No
	79	Wkdy	RT-clarksburg	15.9			Yes	Yes	Yes

Change				Revenue	Revenue		Major	Public	Equity
Date	Route	Service	Change	Hours	Hours	% Change	Service	Meeting	Analysis
	90	Wkdy	RT-reduce peak period trips	Before	After		Change		Completed
				Change	Change				
Jan-17				55.4			No	No	No
	5	Sat	RT	61.6	57.4	-6.8%	No	No	No
	8	Sat	RT	41.4	39.9	-3.6%	No	No	No
	12	Sat	Sligo Creek Detour	42.8	40.8	-4.7%	No	No	No
	14	Sat	RT	26.1	25.4	-2.7%	No	No	No
	16	Sat	RT	105.8	107.8	1.9%	No	No	No
	17	Sat	RT	37.3	36.1	-3.2%	No	No	No
	20	Sat	RT	68.8	68.8	0.0%	No	No	No
	42	Sat	RT	35.4	34.9	-1.4%	No	No	No
	98	Sat	Waterford Hills	32.6	37	13.5%	No	No	No
	5	Sun	RT-move to NC	59.3	60.7	2.4%	No	No	No
	12	Sun	Sligo Creek Detour	40	40.3	0.7%	No	No	No
	16	Sun	RT	97.3	96.2	-1.1%	No	No	No
	17	Sun	RT	31	33.1	6.8%	No	No	No
	20	Sun	RT	58.7	58.8	0.2%	No	No	No
	5	Wkdy	RT	79.8	79.5	-0.4%	No	No	No
	8	Wkdy	RT	43.3	42.7	-1.4%	No	No	No
	12	Wkdy	Sligo Creek Detour	59.5	59.5	0.0%	No	No	No
	13	Wkdy	Sligo Creek Detour	13.5	15.2	12.6%	No	No	No
	14	Wkdy	RT-Node 14A change	34.5	34.1	-1.2%	No	No	No
	16	Wkdy	RT	115.2	116.4	1.0%	No	No	No
	17	Wkdy	RT	45.7	48.4	5.9%	No	No	No
	19	Wkdy	RT	8.1	8.4	3.7%	No	No	No
	20	Wkdy	RT	86	87.9	2.2%	No	No	No
	24	Wkdy	RT	11.6	10.9	-6.0%	No	No	No
	30	Wkdy	Move midday to NC	41.3	41.3	0.0%	No	No	No
	33	Wkdy	RT	28.5	28.4	-0.4%	No	No	No
	42	Wkdy	RT	42.6	42.9	0.7%	No	No	No
	51	Wkdy	RT	15.3	15.2	-0.7%	No	No	No
	52	Wkdy	RT	16.3	16.5	1.2%	No	No	No
	97	Wkdy	Add PM school trips	27.5	27.8	1.1%	No	No	No
	98	Wkdy	Waterford Hills	47.6	47	-1.3%	No	No	No
Dec-16	ALL	All	Takoma Langley TC opns				No	No	No

Change Date	Route	Service	Change	Revenue Hours Before Change	Revenue Hours After Change	% Change	Major Service Change	Public Meeting	Equity Analysis Completed
Sep-16									
	2	Sat	RT	20	21.4	7.0%	No	No	No
	12	Sat	RT	42.8	40.8	-4.7%	No	No	No
	15	Sat	RT	63	64.2	1.9%	No	No	No
	18	Sat	RT	39.9	38.4	-3.8%	No	No	No
	41	Sat	RT	31.5	31.9	1.3%	No	No	No
	45	Sat	RT	41.4	42.6	2.9%	No	No	No
	49	Sat	RT	48.6	43.8	-9.9%	No	No	No
	54	Sat	RT	51	48.2	-5.5%	No	No	No
	61	Sat	RT	69.1	65.6	-5.1%	No	No	No
	100	Sat	RT	33.1	27.4	-17.2%	No	No	No
	2	Sun	RT	18.8	16.3	-13.3%	No	No	No
	12	Sun	RT	40	40.3	0.7%	No	No	No
	15	Sun	RT	46.2	51	10.4%	No	No	No
	18	Sun	RT	27.7	24	-13.4%	No	No	No
	41	Sun	RT	18.9	19.4	2.6%	No	No	No
	49	Sun	RT	38.1	37	-2.9%	No	No	No
	54	Sun	RT	43.1	41.6	-3.5%	No	No	No
	61	Sun	RT	61.4	61.8	0.7%	No	No	No
	100	Sun	RT	28.2	34.8	23.4%	No	No	No
	2	Wkdy	RT	29.5	25.5	-13.6%	No	No	No
	6	Wkdy	RT	24.6	25.6	4.1%	No	No	No
	7	Wkdy	RT	5.8	4.6	-20.7%	No	No	No
	12	Wkdy	RT	59.5	59.5	0.0%	No	No	No
	13	Wkdy	RT	13.5	15.2	12.6%	No	No	No
	15	Wkdy	RT-fewer trips	71.3	78.6	10.2%	No	No	No
	18	Wkdy	RT	45.2	47.3	4.6%	No	No	No
	21	Wkdy	RT	16.1	15.5	-3.7%	No	No	No
	25	Wkdy	RT	25.3	24.2	-4.3%	No	No	No
	30	Wkdy	RT	41.3	41.3	0.0%	No	No	No
	36	Wkdy	RT	30.1	31.3	4.0%	No	No	No
	41	Wkdy	RT	31.9	31.6	-0.9%	No	No	No
	45	Wkdy	RT	56.4	60.7	7.6%	No	No	No
	49	Wkdy	RT	61.5	60.4	-1.8%	No	No	No

Change Date	Route	Service	Change	Revenue	Revenue	% Change	Major Service Change	Public Meeting	Equity Analysis Completed
				Hours Before Change	Hours After Change				
	54	Wkdy	Coord 63 RT & trips	71.7	68.8	-4.0%	No	No	No
	61	Wkdy	RT-every other SB MARC	83.2	79.9	-4.0%	No	No	No
	65	Wkdy	RT	6.7	7.7	14.9%	No	No	No
	100	Wkdy	RT-no load & go, fewer trips	82.4	77.8	-5.6%	No	No	No

***Appendix I – Montgomery County Council Approval***



Resolution No.:	<u>18-1111</u>
Introduced:	<u>April 10, 2018</u>
Adopted:	<u>May 8, 2018</u>

**COUNTY COUNCIL  
FOR MONTGOMERY COUNTY, MARYLAND**

---

Lead Sponsor: County Council

---

**SUBJECT:** Approval of Title VI Policies, Title VI Implementation Plan 2018 -2020, and Title VI Compliance Monitoring Report

**Background**

1. This resolution approves the Title VI Policies, Title VI Implementation Plan 2018 -2020, and Title VI Compliance Monitoring Report.
2. Recipients of public transportation funding from the Federal Transit Administration (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. FTA Circular 4702.IB issued October 1, 2012 requires that each grant recipient through the approval of the recipient's governing board establish Title VI policies and service standards, prepare a Title VI program demonstrating how the recipient is complying with Title VI requirements, and monitor compliance of their transit services.
3. The Title VI Policies include definitions for Fare Change, Major Service Change, Disparate Impact, Disproportionate Burden, Minority Route, and service standards including measures for Vehicle Load, Headways, Schedule Adherence and Service Coverage. These definitions and service standards will be used to monitor the actual provision of the transit service to ensure no disparate treatment of minorities or low-income populations and to evaluate fare and service changes so that disproportionate burdens and disparate impacts are identified and mitigated to the extent possible.
4. The Title VI 2018 – 2020 Implementation Plan follows a format prescribed by the Maryland Transit Administration and addresses each of the topics required by FTA C4702B. As a part of the Title VI Implementation Plan, County staff have developed a Public Participation Plan and Language Assistance Plan.
5. The Title VI Compliance Monitoring Report monitors the performance of the transit system relative to system-wide service standards and service policies. The plan is updated on a tri-annual basis. These monitoring activities are used to compare the level of service provided to predominantly minority areas with the level of service provided to predominantly non-minority areas to ensure that the result of policies and decision-

making is equitable. While the Title VI Compliance Monitoring Report did not identify any disparity, which requires additional review (Appendix C), the report identified overcrowding on some routes as an issue that should be addressed.

**Action**

The County Council for Montgomery County approves the following resolution:

- a. Montgomery County Title VI Policies.
- b. Title VI 2018 -2020 Implementation Plan.
- c. Title VI Compliance Monitoring Report.

This is a correct copy of Council action.

A handwritten signature in blue ink, appearing to read "Megan Davey Limarzi", is written over a horizontal line.

Megan Davey Limarzi, Esq.

Clerk of the Council

---

# Language Assistance Plan

September 2017

*Title VI of the Civil Rights Act of 1964*

*(42 U.S.C. §§ 2000d, et seq.)*

&

*FTA Circular 4702.1B, dated October 1, 2012*

TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT  
ADMINISTRATION RECIPIENTS

Montgomery County Department of Transportation

Division of Transit Services

Rockville, Maryland



**Accessible Formats**

This document will be made available in accessible formats upon request. Paper copies of this document as well as information regarding accessible formats may be obtained by contacting the Title VI Coordinator, Division of Transit Services.

This notice will be made available in other languages.

Este aviso estará disponible en otros idiomas.

本通知将在其他语言中提供

Cet avis seront disponible dans d'autres langues.

이 통지는 다른 언어에서 사용할 수 있는 만들 것 이다.

Thông báo này sẽ được thực hiện có sẵn trong các ngôn ngữ khác.

English

Spanish

Chinese

French

Korean

Vietnamese

Montgomery County Department of Transportation  
Division of Transit Services  
101 Monroe Street, 5th Floor  
Rockville, Maryland 20850

240-777-5800 \* <http://www.montgomerycountymd.gov/dot-transit/dartfirststate.com>



## Contents

<b>I.</b>	<b>Background .....</b>	<b>1</b>
<b>II.</b>	<b>Identification of LEP Individuals Who Need Language Assistance .....</b>	<b>3</b>
<b>III.</b>	<b>Frequency of Contact by LEP Persons with Ride On Services .....</b>	<b>10</b>
a.	Call Center – Requests for Interpretation .....	10
b.	Website Data Translations .....	10
c.	On-board Survey .....	10
d.	Montgomery County Ride On Reported Data .....	10
<b>IV.</b>	<b>Nature and Importance of Transit .....</b>	<b>10</b>
<b>V.</b>	<b>Available Resources &amp; Costs of Providing Language Assistance Services .....</b>	<b>11</b>
<b>VI.</b>	<b>Language Assistance Measures Employed by Montgomery County .....</b>	<b>11</b>
<b>VII.</b>	<b>Planned Language Assistance Initiatives .....</b>	<b>12</b>



## I. Background

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on Limited English Proficient (LEP) persons because such conduct constitutes national origin discrimination.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121, August 16, 2000 directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001 by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to Limited English Proficient users of Federal programs.

The U.S. DOT published revised guidance for its recipients on December 14, 2005. This document states that Title VI and its implementing regulations require that DOT 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) and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” which was published on October 1, 2012. Chapter III, section 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and requires that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of the DOT LEP Guidance.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

Individuals, who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or “LEP.” Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.



Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and linguistically isolated populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

Montgomery County is a very diverse county with more than 39 different languages spoken. The Montgomery County Department of Transportation (MCDOT) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. Montgomery County has devoted significant resources to provide oral and written language assistance services to LEP individuals.

This document provides Ride On's 2017 Language Assistance Plan and includes:

1. Identification of LEP Individuals in the Montgomery County Who Need Language Assistance
2. The Nature and Importance of Transit to LEP Individuals
3. Available Resources and Costs of Providing Language Assistance Services
4. Language assistance measures employed by Montgomery County
5. Planned language initiatives



## II. Identification of LEP Individuals Who Need Language Assistance

The United States Census' most recent American Community Survey (ACS) 5 year estimates (2008-2012) offer a current and reliable estimate of the number, proportion, and geographic distribution of LEP persons in the Ride On service area. This analysis of LEP individuals uses data estimates for the "county subdivision" census-defined areas (shown in Figure 1). The county subdivision geography was chosen because the estimates at this level provide the best balance between detail and statistical significance of the data.

According to the ACS (2011-2015), of the total Montgomery County population over the age of five (951,302):

- approximately 14.4% (137,382) speak English less than "very well".

Figure 1, shows that the highest concentrations of linguistically isolated households<sup>1</sup> are located in and around the Germantown/Gaithersburg area in the center of the county and the Wheaton-Glenmont/College Park area just north of Washington, D.C.

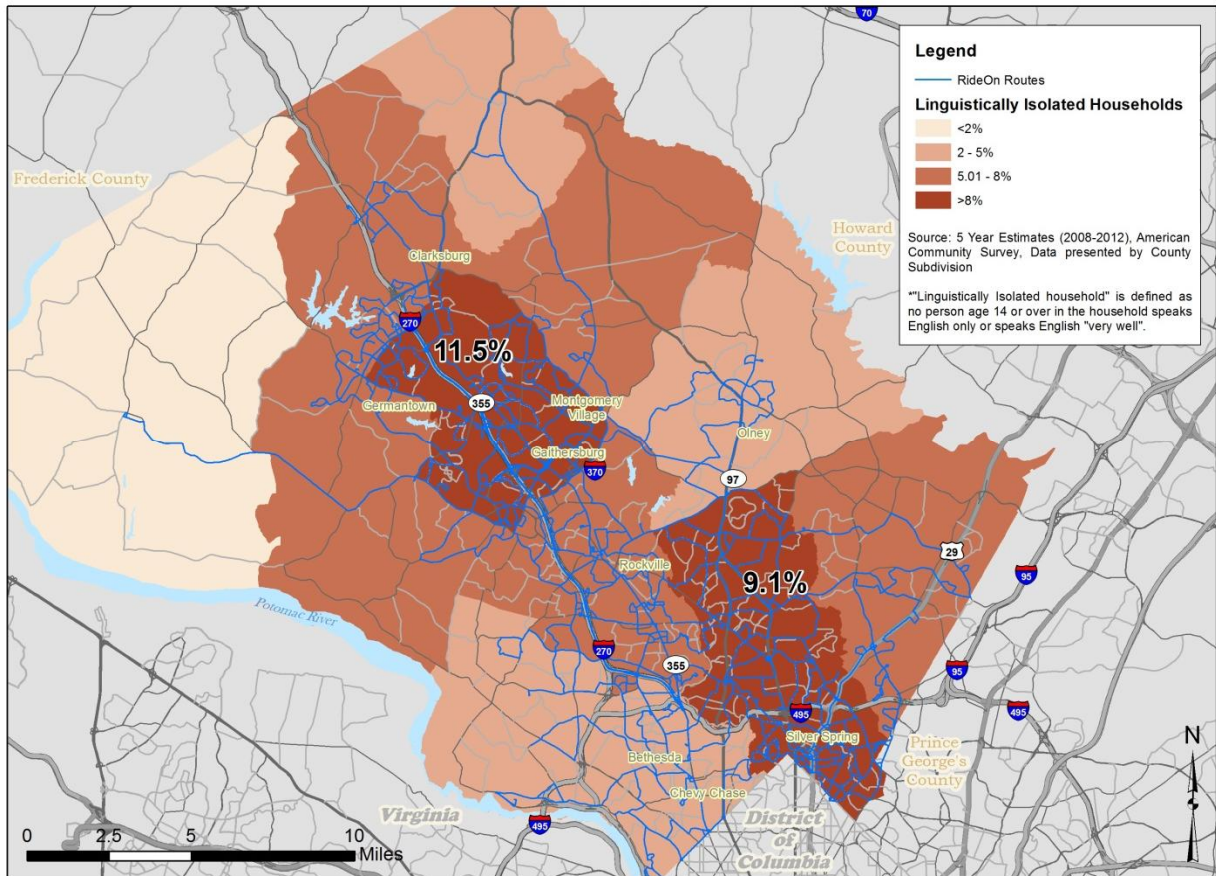
---

<sup>1</sup> households where no person age 14 or older in the household speaks English only or speaks English "very well".





Figure 1: Percent Linguistically Isolated Households, Montgomery County



Of the Montgomery County population age 5 and over that speaks a language other than English at home, approximately 137,382 speak English less than “very well”. Spanish/Spanish Creole, Chinese, Korean, African languages, Vietnamese, and French (including Patois and Cajun) speakers make up the majority (approximately 80%) of the languages spoken at home among the subpopulation of people 5 years and over who speak English less than “very well”. Table 1 shows the number and proportion of all languages spoken using the American Community Survey 2011-2015 data<sup>2</sup>.

<sup>2</sup> Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER.



**Table 1: Language Spoken at Home of Persons that Speak English Less than "Very Well" in Montgomery County (Population 5 Years and Over)**

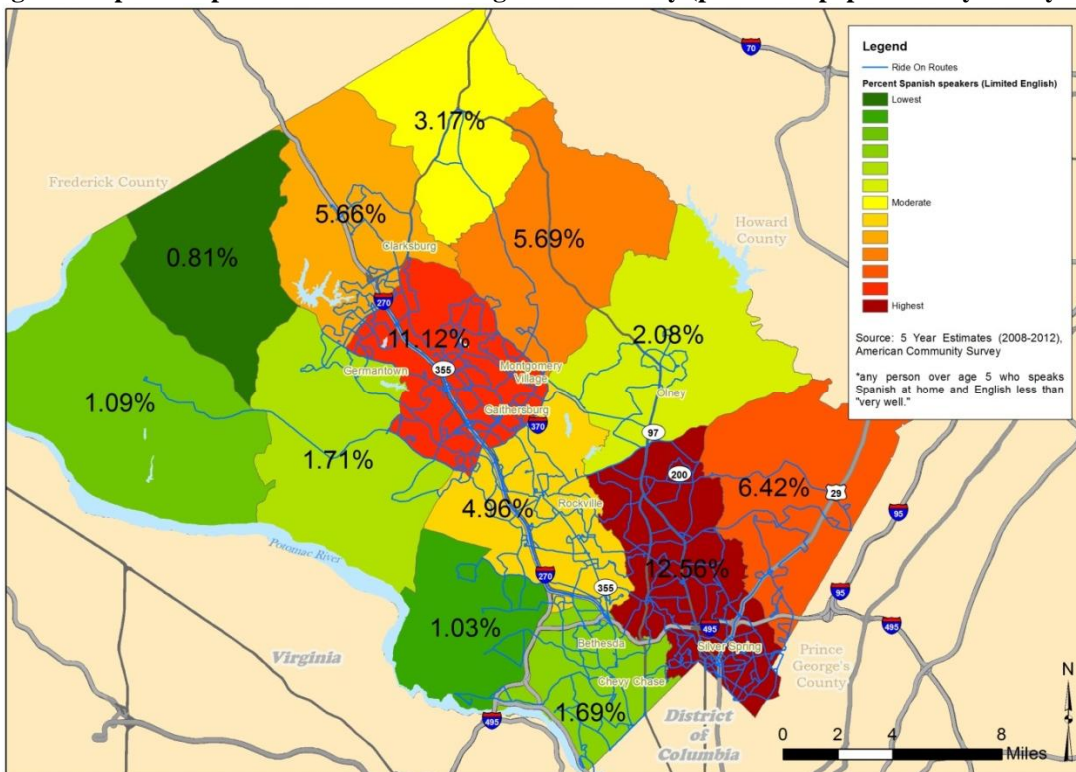
Montgomery County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	64,259	6.75%	46.77%
Chinese	16,351	1.72%	11.90%
African languages	8,840	0.93%	6.43%
Korean	7,294	0.77%	5.31%
Vietnamese	6,769	0.71%	4.93%
French (incl. Patois, Cajun)	5,752	0.60%	4.19%
Persian	2,963	0.31%	2.16%
Tagalog	2,952	0.31%	2.15%
Russian	2,905	0.31%	2.11%
Other Indic languages	2,649	0.28%	1.93%
Portuguese or Portuguese Creole	2,231	0.23%	1.62%
Other Asian languages	1,846	0.19%	1.34%
Japanese	1,308	0.14%	0.95%
Hindi	1,226	0.13%	0.89%
Arabic	1,079	0.11%	0.79%
Urdu	1,041	0.11%	0.76%
Greek	970	0.10%	0.71%
Gujarati	964	0.10%	0.70%
French Creole	925	0.10%	0.67%
Other Pacific Island languages	712	0.07%	0.52%
Thai	662	0.07%	0.48%
German	628	0.07%	0.46%
Italian	586	0.06%	0.43%
Other Slavic languages	345	0.04%	0.25%
Mon-Khmer, Cambodian	330	0.03%	0.24%
Other Indo-European languages	320	0.03%	0.23%
Polish	313	0.03%	0.23%
Armenian	307	0.03%	0.22%
Hebrew	241	0.03%	0.18%
Serbo-Croatian	203	0.02%	0.15%
Other and unspecified languages	91	0.01%	0.07%
Laotian	76	0.01%	0.06%
Hungarian	71	0.01%	0.05%
Other West Germanic languages	56	0.01%	0.04%
Other Native North American languages	49	0.01%	0.04%
Scandinavian languages	45	0.00%	0.03%
Yiddish	19	0.00%	0.01%
Hmong	4	0.0004%	0.003%
<b>Total LEP Population</b>	<b>137,382</b>	<b>14.44%</b>	<b>100.00%</b>
<b>Total County Population</b>	<b>951,302</b>	<b>100.00%</b>	

Safe Harbor Provision threshold is 5% population or 1,000 persons, whichever is less.



Using American Community Survey 5-year Estimates 2006 – 2012, Figures 2 – 7 (pages 6-8) help identify where the highest concentration of each of the top six languages of LEP persons (Spanish/Spanish Creole, Chinese, Korean, African languages, Vietnamese, and French (including Patois and Cajun)) are spoken. The figures show the percent of the population of each county subdivision that speaks the given language at home and speaks English less than “very well”. Those subdivisions shown in red have the greatest percentage of the population with limited English proficiency that speaks the given language. These figures give reasonable guidance regarding the areas likely to have higher language assistance needs and for which languages the assistance is needed; we can be confident that those county subdivisions shown in red tones have higher concentrations of the given LEP population than those county subdivisions in green, but the rankings among subdivisions that have closer percentages may not hold true in reality.<sup>3</sup>

**Figure 2: Spanish Speakers with Limited English Proficiency (percent of population by county subdivision)**



<sup>3</sup> Note regarding data limitations: This calculation deals with some sub-populations that are small and in some cases the estimates come with a significant margin of error; therefore, the percentages presented in Figures 2-7 can be considered good enough to identify the areas with highest percentages of LEP, non-English speakers, but percentages should not be used as concrete figures to compare with other data.





Figure 3: Chinese Speakers with Limited English Proficiency (percent of population by county subdivision)

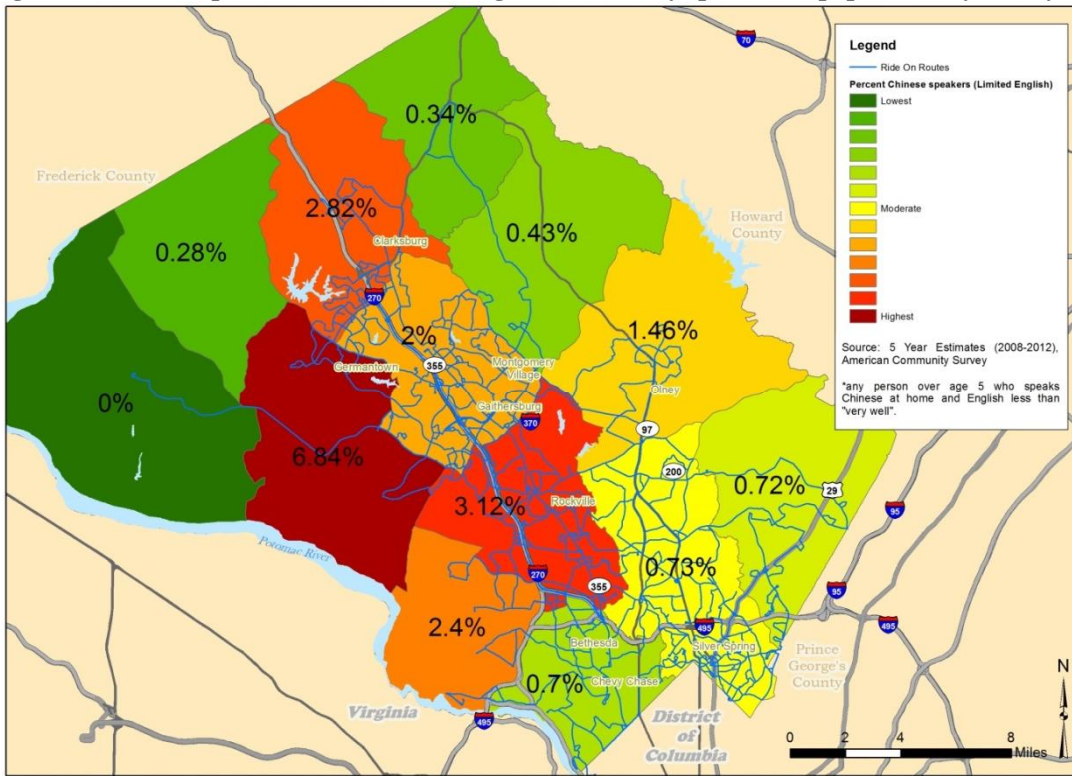
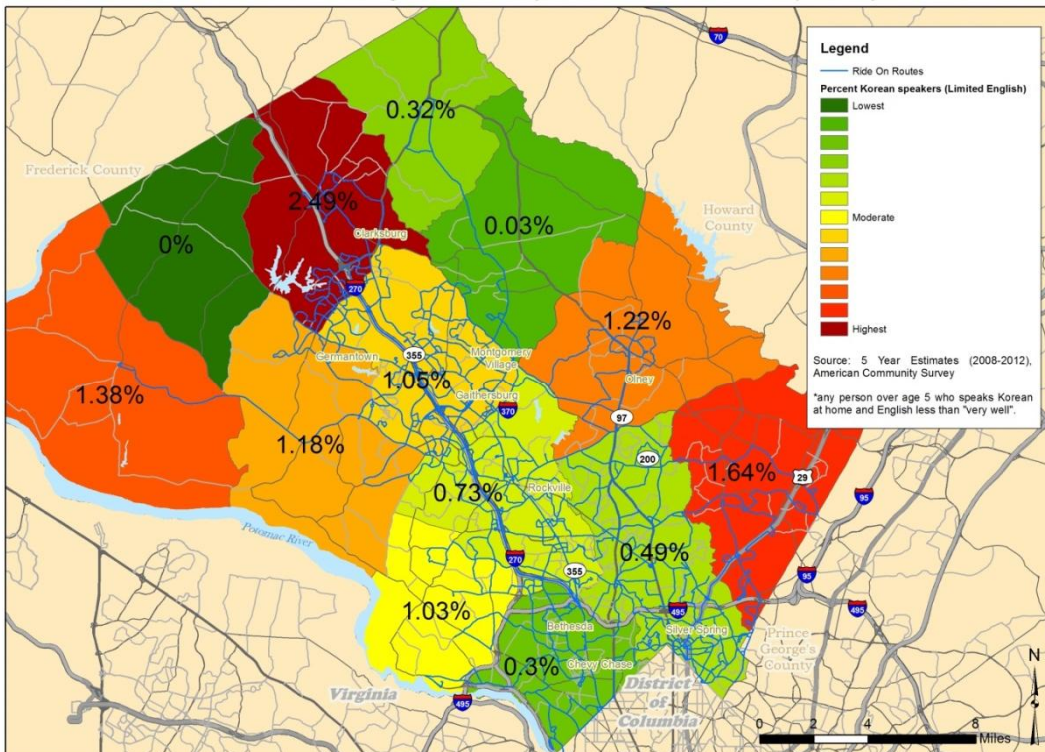
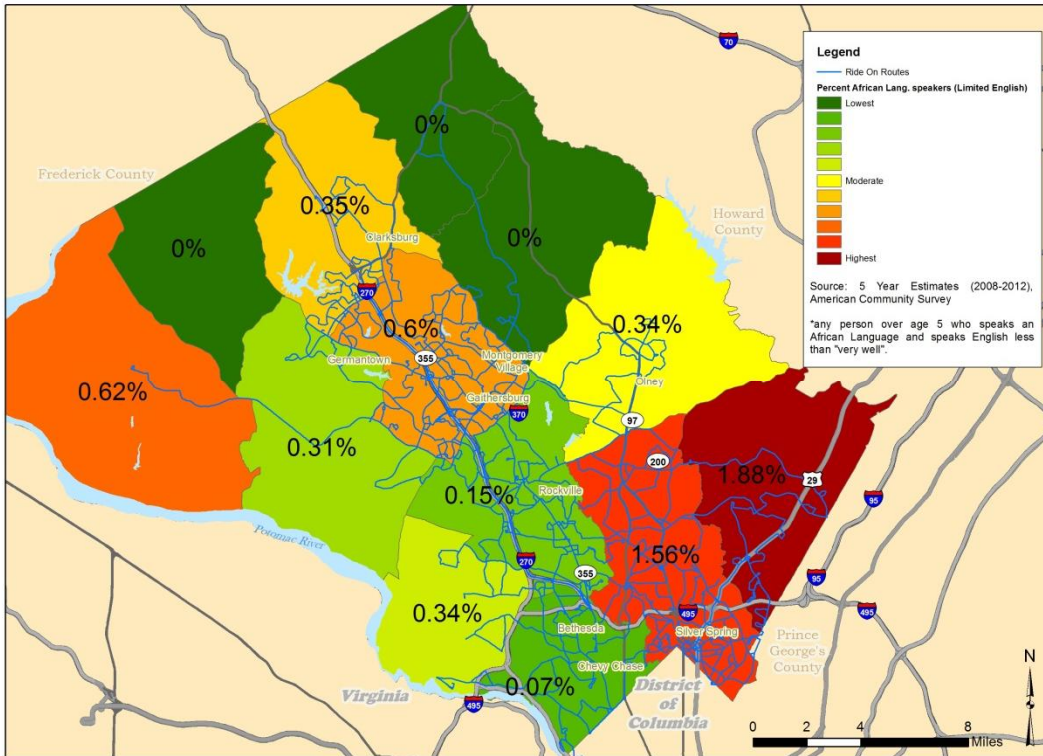


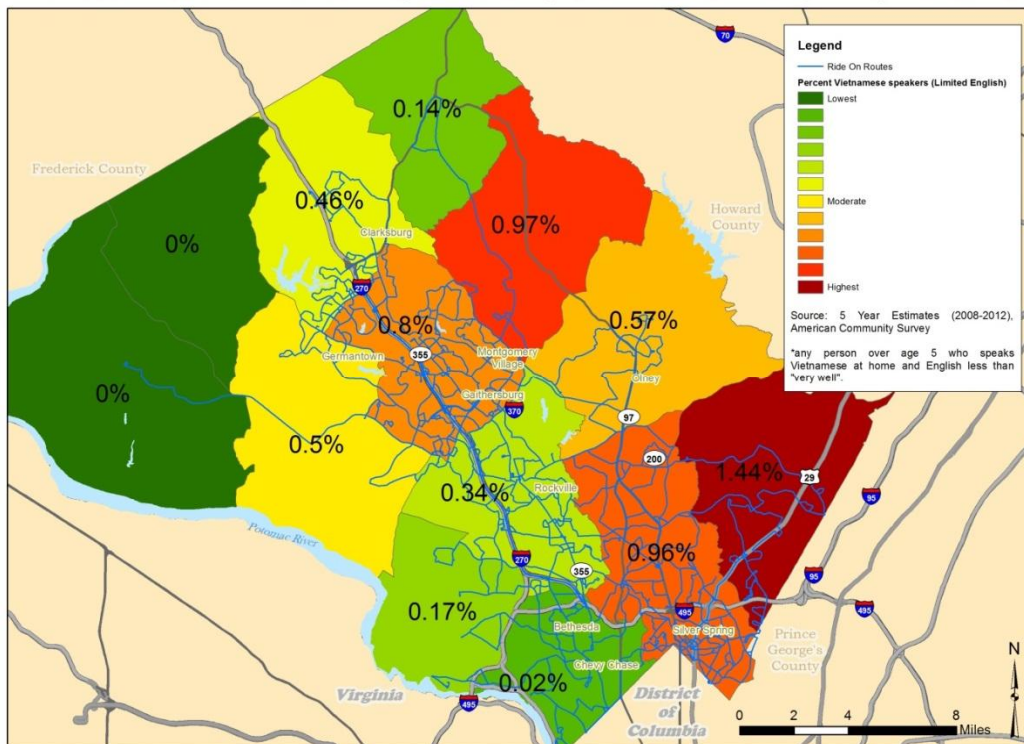
Figure 4: Korean Speakers with Limited English Proficiency (percent of population by county subdivision)



**Figure 5: African Language Speakers with Limited English Proficiency (percent of population by county subdivision)**

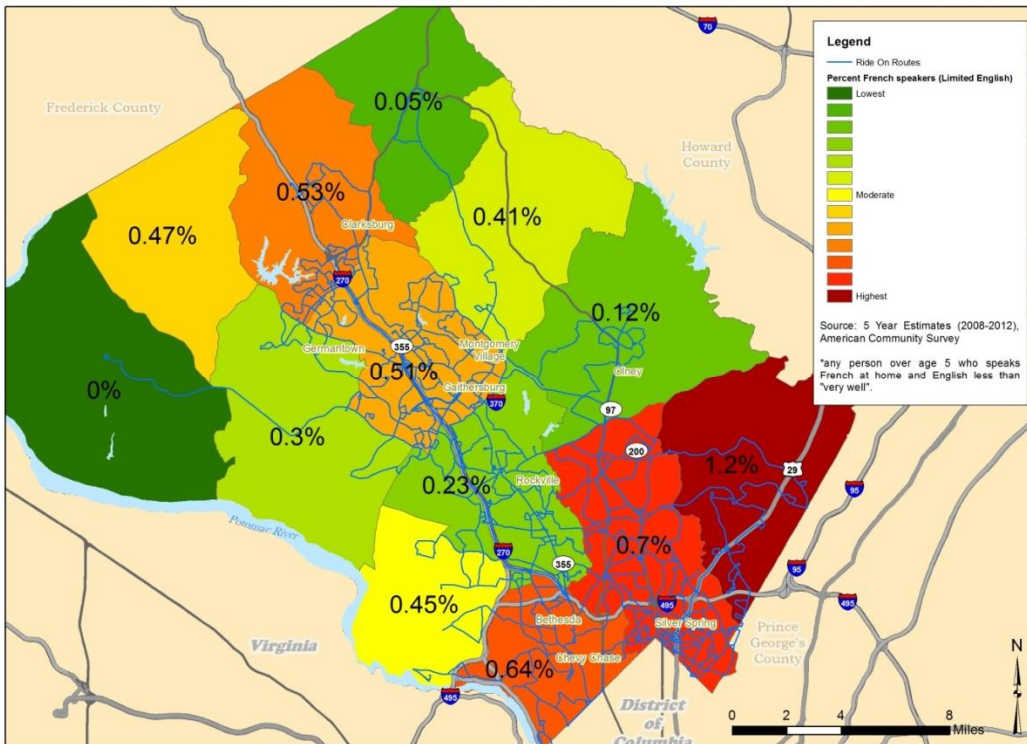


**Figure 6: Vietnamese Speakers with Limited English Proficiency (percent of population by county subdivision)**





**Figure 7: French Speakers (including Patois, Cajun) with Limited English Proficiency (percent of population by county subdivision)**



### III. Frequency of Contact by LEP Persons with Ride On Services

#### ***a. Call Center – Requests for Interpretation***

The call center offers interpretation services through bilingual customer service representatives; this service was used for 1,206 calls during the 2017 fiscal year. The top languages used were: Spanish (1,011), Mandarin (47), French (32), Amharic (33), Vietnamese (20), Farsi (15), and Korean (15). Translation in other languages accounted for 33 calls (approximately 3%).

#### ***b. Website Data Translations***

The County currently is not able to identify web portal translation counts.

#### ***c. On-board Survey***

Ride On's 2014 on-board survey conducted from July through November 2014 asked customers questions about their language usage and skills. Over 10,600 riders participated in the survey; the data are summarized as follows:

- 42.9% of respondents report that they speak a language other than English at home. Languages spoken at home, which were reported, include: Amharic, Arabic, Bengali, Bulgarian, Chinese, Filipino, French, Hindi, Korean, Portuguese, Russian, Spanish, Swahili, Tagalog, Tamil, Vietnamese, etc.
- 7.1% indicate that they read English "not well" or "not at all"
- 7.2% indicate that they speak English "not well" or "not at all"
- 10.6% of participants chose to take the survey in Spanish and less than 1% of participants chose to take the survey in one of the other languages offered (Chinese, Korean, Vietnamese, Amharic, French)

#### ***d. Montgomery County Ride On Reported Data***

Through regular employee meetings and interaction, Ride On management recognizes that interaction with non-english speaking riders is very frequent. Additional data has not been collected to quantify the frequency of contact.

### IV. Nature and Importance of Transit

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons. According to the 2000 Census, nationally, more than 11% of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. However, public transit use among recent immigrants decreases with length of residence in the United States. Many immigrants desire to switch from public transit to automobile use because personal vehicles are a symbol of assimilation and cars can provide greater mobility or access to economic and social opportunities that are beyond a transit system's service area. Recent immigrants might elect to continue using public transit for at least a portion of their trips if their experience with public transit



is positive. For transit agencies seeking to increase their “choice riders,” it may be easier to retain riders who have past, positive impressions of the system than to attract those persons who have never or rarely used transit. Catering to LEP persons may help to increase and retain ridership among Montgomery County immigrant communities.

## V. Available Resources & Costs of Providing Language Assistance Services

As noted in section VII, MCDOT maintains a variety of support services to LEP customers and residents. During fiscal year 2017, the Division of Transit Services spent \$2,158 for translating language assistance materials. Certified multilingual Division of Transit Services employees receive additional compensation which totaled \$195,094 in fiscal year 2017.

## VI. Language Assistance Measures Employed by Montgomery County

Montgomery County Ride On supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. The County Executive Order 046-10, effective March 2010, aims to enhance the quality and effectiveness of services for individuals with Limited English Proficiency in a variety of ways. County policy and employee guidelines for implementation are explained in the LEP Employee Handbook. Under its goals of inclusion and access, the County currently offers a number of language assistance services relative to the provision of transit services, including:

### Translation Services

- The Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) permits translation of Ride On schedules and other public materials into 82 different languages.
- The County has hundreds of employees that are certified in at least one other non-english language through the Multilingual Certification Program (see Training Initiatives, below) and available to provide translating services within or outside his/her primary department. As of September 2017, the Transit Services Division had 96 certified bilingual employees, 92 of whom were bus operators. The primary function of the certified employees within MCDOT is direct communication and minor interpretation or translation services. MCDOT uses their certified languages daily as part of their work with their users of public transportation, parking, and consumer questions to the Director's Office.
- The County's Language Bank of volunteers is available to help translate and interpret for County government agencies and registered nonprofit organizations serving residents with limited English proficiency. Language Bank volunteers serve as interpreters and translate documents for various agencies and organizations.
- Language ID boards at all service sites to help County staff identify which language the LEP person speaks.
- The MC311 Customer Service Center offers a single point of contact for information on County services and program and includes language interpretation service with over 150 languages available. After calling 311, press 1, for Spanish, or stay on the line to ask the next available customer service representative to request to conduct the call in the language of your choice. The service can be accessed through telephone and web-based channels





and is made known through community outreach efforts, which include flyers/palm cards in multiple languages, meeting with community groups, and television/radio/newspaper advertisements in Spanish. According to the 2015 report by the Office of Legislative Oversight on MC311 calls, Ride On Trip planning and arrival requests were the top requests of all callers and in the top three of Spanish-preferred callers.

- The Passenger Bill of Rights and Responsibilities is provided in English and Spanish.

#### **Public Outreach**

- A website dedicated to language access ([www.montgomerycountymd.gov/lep](http://www.montgomerycountymd.gov/lep))
- PSA videos in multiple languages to raise awareness about the availability of language assistance services.
- The Office of Community Partnerships employs a staff of over one dozen to carry out the County Executive's commitment to build a larger policy table with participation by a more diverse range and greater number of residents, particularly those from underserved and emerging communities. This program includes a network of contacts and community based resources that could help LEP persons navigate community resources, including transit use.

#### **Training Initiatives**

- Multilingual Certification Program through the office of Human Resources encourages employee certification in one of the approved languages identified as the predominant languages used by county residents to enhance its ability to serve its LEP customers. There are hundreds of certified employees who can be called upon for services outside of their primary department.
- A three hour training course for all frontline staff and those who may interact with LEP persons is mandatory.
- Community Interpreter training is a mandatory day-long training course for certified bilingual employees to learn the ethics and techniques of being a more effective interpreter.

#### **Monitoring**

- An LEP leadership Team led by the Language Access Coordinator oversees countywide policies and practices on language access; LEP Department Liaisons designated by department directors are responsible for implementing the LEP policy for the Executive Branch's departments, office, and programs. Each Department is responsible for maintaining an up to date Language Access Plan.

## **VII. Planned Language Assistance Initiatives**

The Montgomery County Department of Transportation created a Title VI compliant Language Assistance Plan (LAP) in June 2009. The LAP was updated in 2014 and 2017 and is intended to:

- 1) Ensure MCDOT's compliance with applicable federal and state laws and guidelines as well as the County's policy on providing meaningful access to people with limited English proficiency; and
- 2) Establish expectations, processes and accountability mechanisms for all units and employees within MCDOT that interact with individuals with LEP.

To those ends, MCDOT has identified the following actions to address potential access barriers faced by LEP customers as of 2017:



**Translation of Vital Documents:**

- Continue the Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) which permits translation of Ride On schedules and other public materials into 82 different languages.
- Continue to print bilingual bus notices for fare changes, schedule changes and other policy changes.
- Continue to print and advertise notices for public forums in other languages.
- Continue to translate certain media releases.
- Continue to provide other language support through the conferencing telephone at the Transit Information window.
- Maintain greeting and other messages in Spanish on the main contact numbers.
- Continue to staff certain community events with bilingual staff.
- Advertise with other language media for certain programs, such as Give and Ride Residents Guide to Services, will continue to be printed in five languages.

**Public Communications:**

- Continue the Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) which permits translation of Ride On schedules and other public materials into 82 different languages.
- Display language ID posters or boards at various DOT front desk areas and visitor's centers.
- Continue to print bilingual bus notices for fare changes, schedule changes and other policy changes.
- Continue to print and advertise notices for public transit forums in other languages.
- Continue to translate certain public transit media releases.
- Continue to provide other language support through the conferencing telephone at the Transit Information window.
- Record greeting messages on the main contact numbers in Spanish.
- Continue to use bilingual staff and bilingual materials at public events and community activities.
- Maintain greeting and other messages in Spanish on the main contact number.
- Continue to staff certain community events with bilingual staff.
- Advertise with other language media for certain programs such as Give and Ride.
- Locate bilingual staff member at DOT Customer Service desk to assist customers.

**Staff Training:**

- All frontline staff will continue to receive the 3-hour LEP training hosted by OHR. Managers and supervisors will receive a different version of training on language access requirements and cross-cultural competency to be designed by the Language Access Coordinator in conjunction with OHR.
- All staff with public interaction will receive additional hands-on training and written instruction on how to access and properly use language resources.
- The Department's Community Relations Manager will continue to attend the monthly Community Outreach Forum sponsored by the County Executive's Office of Community Partnerships. He/She will share relevant LEP information from this meeting with division chiefs, for transmittal to their staff as appropriate.



- MCDOT will invite the Language Access Coordinator to conduct an on-site LEP briefing so as to avoid waiting for too long to bring all frontline staff to speed.

**Internal and External Evaluation, Data Collection and Reporting:**

- Performance evaluation of frontline staff, their supervisors and directors will reflect their awareness and work (in the form of staff training) of LEP policy, requirements and quality of work.
- The number and nature of complaints as well as response time and level of satisfaction in resolution will all be part of data collection.



---

# **Title VI Compliance Monitoring Report**

---

August 2017

*Title VI of the Civil Rights Act of 1964*

*(42 U.S.C. §§ 2000d, et seq.)*

&

*FTA Circular 4702.1B, dated October 1, 2012*

TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT  
ADMINISTRATION RECIPIENTS

Montgomery County Department of Transportation

Division of Transit Services

Rockville, Maryland



**Accessible Formats**

This document will be made available in accessible formats and other languages upon request. Paper copies of this document as well as information regarding accessible formats may be obtained by contacting the Title VI Coordinator, Division of Transit Services.

Montgomery County Department of Transportation  
Division of Transit Services  
101 Monroe Street, 5th Floor  
Rockville, Maryland 20850

240-777-5800 \* <http://www.montgomerycountymd.gov/dot-transit>



## Table of Contents

<b>1. Overview and Recommendations .....</b>	<b>1</b>
<b>2. Montgomery County Service Standards.....</b>	<b>2</b>
2.1. FTA Service Standard Requirements.....	2
2.2. Ride On Service Standards.....	2
2.3. RIDE ON Service Policies .....	3
<b>3. Monitoring Methods .....</b>	<b>5</b>
3.1. Minority Population by Bus Route .....	5
3.2. Vehicle Load Factor Monitoring Method .....	7
3.3. Route Headways Monitoring Method.....	7
3.4. On-Time Performance Monitoring Method .....	7
3.5. Service Accessibility Monitoring Method .....	7
3.6. Vehicle Assignment Monitoring Method.....	7
3.7. Distribution of Transit Amenities Monitoring Method.....	7
<b>4. Monitoring Results .....</b>	<b>8</b>
4.1. Vehicle Load Factor Monitoring Results .....	8
4.2. Route Headways Monitoring Results .....	8
4.3. On-Time Performance Monitoring Results .....	9
4.4. Service Accessibility Monitoring Results .....	9
4.5. Vehicle Assignment Monitoring Results .....	10
4.6. Distribution of Transit Amenities Monitoring Results .....	10
4.7. Load Factor Detailed Results .....	12
4.8. Route Headways Detailed Results .....	14
4.9. On-Time Performance Detailed Results .....	16
4.10. Service Accessibility Detailed Results .....	17
4.11. Vehicle Assignment Detailed Results .....	20
4.12. Distribution of Transit Amenities .....	22



## **1. Overview and Recommendations**

Following the guidelines set forth by FTA Circular 4702.1B, the Montgomery County Department of Transportation (MCDOT) monitors the performance of the transit system relative to system-wide service standards and service policies on a tri-annual basis. These monitoring activities are used to compare the level of service provided to predominantly minority areas with the level of service provided to predominantly non-minority areas to ensure that the result of policies and decision-making is equitable.

The monitoring methodology groups the routes into four quartiles with quartile 1 having the highest minority population and quartile 4 having the lowest minority population. For the purpose of this monitoring report, routes grouped in quartiles 1 and 2 are considered the minority services.

This Compliance Monitoring Report has not identified any of disparity which requires additional review.



## 2. Montgomery County Service Standards

### 2.1. FTA Service Standard Requirements

MCDOT receives FTA funding to provide service in Montgomery County, Maryland as a sub-recipient to the Maryland Transit Administration. As defined under 49 U.S.C. 5307, the county has a population of 200,000 people or greater. As such, public transit providers are required to develop service standards and policies.

Pursuant to FTA circular 4702.1B, RIDE ON has established and monitors service performance under quantitative service standards and qualitative service policies. The standards and policies that must be monitored are:

- Standards
  - Vehicle Load for each mode
  - Vehicle Headway for each mode
  - On-Time Performance for each mode
  - Service Accessibility for each mode
- Policies
  - Vehicle Assignment for each mode
  - Distribution of Transit Amenities (Policy and Standards) for each mode

### 2.2. Ride On Service Standards

Standards for each of the FTA requirements are described below:

**Vehicle Load Factor** - This standard is measured as the ratio of passengers on board to the seated bus capacity expressed as a percent. Values of 100 percent or less indicate all riders are provided a seated ride while values of more than 100 percent denote standees. Loading standards indicate the degree of crowding (i.e., standees) which is acceptable, with consideration given to both the type of service and the operating period. Acceptable load factors are as follows:

Service Type	Load Factor
Regular Routes	1.2
Express	1.0

**Vehicle Headways** - In general, frequencies or "headways" (the time between one bus and the next at the same location in the same direction) are established to provide enough vehicles past the maximum load point(s) on a route to accommodate the passenger volume and stay within the recommended load factor standards. If passenger loads are so light that an excessive time is needed between vehicles to meet loading standards, then headways should be set on the basis of policy





considerations. Montgomery County has established a thirty minute headway as the minimum policy headway for routes operating in any time period.

As with all standards, the minimum headway is not an absolute measure and should be used as a guide. There may be situations where low demand and actual running times warrants even less frequent service. Further, headways should be designed, wherever possible, to conform to regularly recurring clock face intervals. There are instances where operational efficiencies may take the place of the benefits of clock face headways.

**On-Time Performance** – on-time performance standards have been established as follows:

<b>Schedule Adherence (OTP):</b>	<b>All Service Types</b>
2 minutes early to 7 minutes late	88.5%

**Service Accessibility** – Within Montgomery County transit service is provided to traffic analysis zones with 3+ households per acre and/or 4+ jobs per acre.

### **2.3. RIDE ON Service Policies**

**Vehicle Assignment Policy** – Ride On transit vehicles are assigned to three garages based upon their size and technology. The Nicholson Court Garage located near White Flint is a leased facility and can only accommodate diesel buses 30 foot in length or shorter. The Silver Spring Garage located near downtown Silver Spring can only accommodate diesel fueled buses. The David F. Bone Equipment Maintenance and Transit Operations Center (EMTOC) located in Gaithersburg can accommodate diesel and CNG buses up to 60 foot in length. Vehicles are assigned to routes based upon ridership loads with smaller buses assigned to routes with lighter loads and full sized buses assigned to routes with heavier loads. RIDE ON monitors the age of buses assigned to routes by periodically sampling the bus assignments for a weekday and then comparing the average age of the buses assigned by quartile to the average age for all buses assigned. If the average age of buses assigned to any quartile is one standard deviation higher than the average of all buses assigned, then further investigation of the bus assignment process will be conducted.

**Distribution of Transit Amenities Policy** - In accordance with RIDE ON policy Bus Stop/Passenger Facilities will generally be located at or near major trip generators or destinations or at regular intervals based on the population density and transit-related demographic factors along the route. Stops must be in locations passengers can board and alight safely and where buses can safely enter and exit. Optimally, bus stop locations will have pedestrian friendly facilities, including sidewalks and walkways that separate pedestrians from vehicular traffic. Whenever possible, stops in opposite directions on a route will be located directly opposite each other.

All stops will be fixed locations designated by RIDE ON in accordance with this policy. Additionally, Ride On has a Night Request Stop program that allows passengers to request to be let off at any location with the following limitations: after 9:00 p.m. only; alighting only; must be on the regular route; location must be safe to stop; in Maryland only.



Bus stops shall not obstruct driveways or entranceways or cause visual obstructions for motorists or for bus operators merging back into the traffic stream. In areas that have high traffic volumes, turning movements, and pedestrian crossings through intersections, the stop should be placed where it presents the least conflict with vehicular traffic and pedestrians.

Decisions for final bus stop selection are based on the following:

- Passenger origins
- Adjacent land use and activities
- Operational feasibility in accessing the stop
- Physical constraints or obstructions (trees, driveways, etc.)
- Pedestrian access including accessibility for people with disabilities
- Parking restrictions and requirements
- Traffic volumes on adjacent roadways particularly as evidenced by turning movements
- An examination of the individual bus route/routes that serve the potential stop
- Bus and intermodal (rail, park and ride) transfers to the stop

Safety is a critical consideration. Stops shall not be placed where they present a hazard to passengers, transit vehicles, or other traffic.

Park and Ride lots are a special category of bus stops intended to extend the reach of transit by collecting passengers from a wider area. Their location is based on availability of land or preexisting parking and connections to the regional highway system. Park and rides may also accommodate carpoolers, bicycle riders and serve as transit hubs. Planning and development of park and rides include a higher level of involvement with the public, other MCDOT divisions, Maryland National Capital Park and Planning Commission, WMATA and Maryland Transit Administration.

Bus stop interval spacing has a major impact on transit operations. It greatly impacts a route's travel time, service reliability, and schedule adherence as well as the route's attractiveness to the customer population. RIDE ON guidelines for bus stop spacing are based on a combination of factors including:

- Type of service operated
- Ridership levels
- Passenger transfer potential and demand
- Type of roadway used for operation
- Prevailing traffic conditions operating on the roadway
- Adjacent and surrounding land use, trip generators, or attractors
- Topography of the area
- Population densities and demographic characteristics
- Interface with other routes and public transportation services

Bus stops should be placed approximately 750 feet to 1000 feet apart or 5-7 bus stops per mile.

1. Exceptions to Interval Spacing Requirements: Interval spacing guideline exceptions should be limited and made on a case-by-case basis in order to not confuse customers or



adversely impact a route's running time and schedule adherence. The following are examples of exceptions to interval spacing requirements:

- Street or subdivision design causes walking distance to the stop to be excessive
  - Topographic conditions, such as hills or steep grades leading to and from a bus stop
  - Demographic characteristics of customers, such as elderly customers who are unable to conveniently travel the prescribed guideline distance between bus stops
  - High volume activity centers.
2. Consolidation of Bus Stops: Where there are excessive numbers of stops located at short intervals, stops with low levels of ridership will be consolidated. Individual stops may be eliminated or adjacent stops may be consolidated at a suitable intermediate location. Determination of stops to be retained will be based on operational, safety, accessibility, customer convenience considerations and on the suitability of the site for customer facilities.

### **3. Monitoring Methods**

RIDE ON will produce a Title VI Monitoring Report every three years. The monitoring method for each service standard and policy follow.

#### **3.1. *Minority Population by Bus Route***

Using the 2014 on-board survey, RIDE ON has identified the minority and majority population for each route. Each route's minority and majority population will be totaled and a percent minority population will be calculated. The routes will then be ranked in descending order of minority population and divided into four quartiles with the highest minority percentage in the first quartile. Table 3-1 below lists the Ride On routes with minority percentages and arranged in quartiles. This minority ridership ranking by quartile will be utilized in the service monitoring to determine if service is being fairly and equitably provided.



**Table 3-1: Ride On – Montgomery County Population by Transit Route**

Minority by Route – 2014 Survey			Minority by Route – 2014 Survey		
	Route #	% Minority		Route #	% Minority
Quartile 1	43	94.7%	Quartile 3	63	83.1%
	15	94.1%		70	82.1%
	20	93.9%		60	81.8%
	41	93.8%		21	81.1%
	65	93.3%		100	80.6%
	38	92.5%		42	80.3%
	17	92.4%		78	80.0%
	10	92.3%		93	80.0%
	83	91.8%		5	79.8%
	79	91.3%		1	78.4%
	49	91.1%		12	77.1%
	16	90.8%		34	77.0%
	8	90.1%		81	75.0%
	25	89.8%		98	75.0%
	39	89.8%		90	74.6%
	58	89.5%		24	74.2%
	74	89.3%		47	72.1%
	55	89.2%		44	71.8%
	57	89.1%		23	71.6%
	59	89.1%			
Quartile 2	26	89.0%	Quartile 4	45	71.1%
	97	88.9%		96	71.0%
	56	88.3%		53	70.7%
	11	88.1%		37	70.6%
	51	87.5%		33	70.2%
	64	87.1%		76	69.8%
	28	86.8%		13	65.6%
	2	86.7%		36	65.5%
	48	86.2%		29	64.0%
	61	85.9%		6	63.2%
	31	85.7%		22	63.0%
	66	85.7%		52	60.0%
	75	85.1%		19	57.1%
	9	84.9%		30	56.1%
	67	84.6%		14	55.4%
	18	84.5%		4	51.4%
	54	84.2%		7	50.0%
	71	84.0%		32	33.3%
	46	83.4%		3	0.0%
	94	83.3%			



### **3.2. Vehicle Load Factor Monitoring Method**

Using the GFI Fare collection data for a recent fiscal year, ridership and service capacity data will be collected for each route and an average week day AM peak period and PM peak period will be calculated. Using the quartiles shown in Table 3-1, the average load factor per quartile for each peak period will be calculated. A disparity will exist if the average load factor for either quartile 1 or 2 is one standard deviation higher than the system average.

### **3.3. Route Headways Monitoring Method**

Using published timetables, headway data will be collected for each route by four time periods. Using the quartiles shown in Table 3-1, the average headway will be calculated for each quartile and time period. A disparity will exist if the average headway for either quartile 1 or 2 is one standard deviation longer than the system average.

### **3.4. On-Time Performance Monitoring Method**

Using automatic vehicle location data for a recent fiscal year, on-time performance will be collected for each route. Using the quartiles shown in Table 3-1, the average on-time performance will be calculated for each quartile and time period. A disparity will exist if the average on-time performance for either quartile 1 or 2 is one standard deviation less than the system average.

### **3.5. Service Accessibility Monitoring Method**

Using the most recent US Census and GIS analysis RIDE ON will estimate the percentage of the minority and majority population within ¼ mile of a transit route. If a transit route travels within ¼ mile of a block group, the minority and majority population from that census block group will be assumed to have accessibility to transit services. The average minority and majority access to transit for the system will be calculated. If the minority rate of transit service access is less than 90% of the average rate of transit service access for the total population a disparity will exist.

### **3.6. Vehicle Assignment Monitoring Method**

Using vehicle assignments for a recent weekday, the average age of all buses operating on a route during that weekday will be calculated. Using the quartiles shown in Table 3-1, the average age will be calculated for each quartile. A disparity will exist if the average bus age for either quartile 1 or 2 is one standard deviation older than the system average for all buses assigned.

### **3.7. Distribution of Transit Amenities Monitoring Method**

Transit amenities will be mapped on GIS mapping for minority and low income populations and the number of shelters and benches will be counted in each area. The number of shelters and the number of benches will be calculated for the minority / non-minority areas and the low income areas based upon the percent of households in poverty. Rates of shelters and benches per 1,000 households will be calculated. If the rate of shelters or benches in minority / low income areas is 20 per cent less than in non-minority / non-low income areas a disparity will exist.



## 4. Monitoring Results

### 4.1. Vehicle Load Factor Monitoring Results

Ridership and service capacity data was collected for Fiscal Year 2017. Average weekday AM peak period and PM peak period load factors by quartiles are shown in Table 4.1.

**Table 4-1: Ride On Vehicle Load Factor Monitoring Results – Fiscal Year 2017**

Quartile	AM Peak	PM Peak
1	54.0%	64.0%
2	43.9%	57.9%
3	41.9%	48.4%
4	33.8%	30.0%
System Average	43.6%	50.6%
Standard Deviation	0.199718	0.3205554
Disparity Limit	63.5%	82.7%

The monitoring methodology establishes that a disparity exists if the average load factor for either quartile 1 or 2 is one standard deviation higher than the system average. In the AM Peak and PM Peak, the load factor for quartiles 1 and 2 are higher than the system average but lower than the disparity limit.

There are four routes that exceed Ride On's PM Peak Hour Load factor policy of 120% during the PM peak including Route 55 – 174%, Route 59 – 125%, Route 61 – 122% and Route 1 – 125%. Routes 55, 59 are in Quartile 1, Route 61 is in Quartile 2, and Route 1 is in Quartile 3. Beginning October 2, 2017, RIDE ON is adding a new Route 101 – Ride On extRa which will add additional capacity between Lakeforest, Shady Grove, Rockville and Bethesda. This new route should reduce overcrowding on Routes 55, 59 and 61.

### 4.2. Route Headways Monitoring Results

Using the Fiscal Year 2017 Service Summary, headway data was collected for each route by four time periods. The average headway was calculated for each quartile and time period as shown in Table 4-2 below. A disparity exists if the average headway for either quartile 1 or 2 is one standard deviation longer than the system average.

**Table 4-2: Ride On Route Headways Monitoring Results – Fiscal Year 2017**

Quartile	AM Peak	Mid Day	PM Peak	Evening
1	21.4	25.6	22.1	28.0
2	23.0	27.1	22.8	28.5
3	23.6	27.7	24.4	30.0
4	26.9	30.0	27.1	35.0
System Average	23.7	27.2	24.0	28.8
Standard Deviation	7.9	5.6	7.5	4.1



Disparity Limit	31.6	32.8	31.6	32.9
-----------------	------	------	------	------

Analysis of the headways indicates that there are no disparities.

### **4.3. On-Time Performance Monitoring Results**

Using the automatic vehicle location system for Fiscal Year 2017, on-time performance data for all time points was collected for each route. The average on-time performance was calculated for each quartile and summarized in Table 4-3. The monitoring methodology provides that a disparity exists when the average on-time performance for either quartile 1 or 2 is one standard deviation less than the system average.

**Table 4-3: Ride On On-Time Performance – Fiscal Year 2017**

Quartile	On-Time Performance
1	90.7%
2	89.8%
3	82.7%
4	91.0%
System Average	90.9%
Standard Deviation	9.7%
Disparity Limit	81.2%

Analysis of the on-time performance results indicates that overall on-time performance has achieved the system goal of 90.9 percent.

### **4.4. Service Accessibility Monitoring Results**

Table 4-4 presents the GIS analysis of the percentage of minority and non-minority populations within ¼ mile of a Ride On and Metro Bus transit route. The monitoring methodology provides that a disparity exists if the minority rate of transit service access is less than 90% of the majority population rate of transit service access. The data for this calculation is shown in Table 4-9 below.

**Table 4-4: Ride On Service Accessibility Analysis – September 2013**

	Total Population	Minority Population	Non-Minority Population
Montgomery County	971,777	493,012	478,765
Transit Service Area	854,312	447,350	406,962
% of population within transit service area	87.9%	90.7%	85.0%

Review of the data indicates that no disparity exists.





#### **4.5. Vehicle Assignment Monitoring Results**

Using vehicle assignments for April 26, 2017, the average age of all buses operating on a route was calculated and the average age was calculated for each quartile. The monitoring methodology requires that a disparity exists if the average bus age for either quartile 1 or 2 is one standard deviation older than the system average for all buses assigned.

**Table 4-5: Bus Average Age April 26, 2017**

Quartile	Average Age
1	6.70
2	7.21
3	6.47
4	5.92
System Average	6.63
Standard Deviation	2.35
Disparity Limit	8.99

Review of the data indicates that the average age of buses assigned to quartile 1 and quartile 2 are slightly older than the system average. The analysis demonstrates however that no disparity exists.

#### **4.6. Distribution of Transit Amenities Monitoring Results**

The location of transit amenities has been analyzed to determine if they have been fairly located for minority and low-income populations. Tables 4-6 and 4-7 compare the rate of transit amenities calculated as shelters and / or benches per 1,000 households.

The rate of transit amenities per 1,000 households is higher for census block groups that have minority concentrations greater than the county average and the rate of transit amenities per 1,000 households is highest in the low income groups. Considering this data, there does not appear to be any disparity in the location of transit amenities.

**Table 4-6: Transit Amenities Relative to Minority Concentrations**

Minority Census Block Groups	Households	Shelters	Benches	Shelters per 1,000 Households	Benches per 1,000 Households
Low Minority concentrations less than 50.7%	186,442	397	627	2.13	3.36
High Minority Concentrations more than 50.7%	166,735	367	501	2.20	3.00
County Total	353,177	764	1,128	2.16	3.19





**Title VI Compliance Monitoring Report**  
**August 2017**

**Table 4-7: Transit Amenities Relative to Low-income Concentrations**

Percent of Households less than Poverty Level	Households	Shelters	Benches	Shelters per 1,000 Households	Benches per 1,000 Households
< 10 %	287,338	557	885	1.94	3.08
10.1% - 20%	50,598	149	179	2.94	3.54
20.1% - 30%	11,755	40	45	3.40	3.83
30.1% - 40%	3,486	18	19	5.16	5.45
County Total	353,177	764	1,128	2.16	3.19



### 4.7. Load Factor Detailed Results

Table 4-8: Load Factor Analysis – Fiscal Year 2017

Load Factor		Average Weekday – Fiscal Year 2017					
Q#	Route #	AM Peak Boardings	PM Peak Boardings	AM Peak Seats	PM Peak Seats	AM Load Factor	PM Load Factor
Quartile 1	43	94.7%	157	198	692	655	23%
	15	94.1%	998	601	1743	1440	57%
	20	93.9%	657	726	1099	910	60%
	41	93.8%	182	188	569	455	32%
	65	93.3%	137	50	218	182	63%
	38	92.5%	230	239	720	493	32%
	17	92.4%	215	229	682	606	32%
	10	92.3%	531	512	606	455	88%
	83	91.8%	112	137	540	432	21%
	79	91.3%	159	84	295	221	54%
	49	91.1%	512	453	764	655	67%
	16	90.8%	605	859	1023	1023	59%
	8	90.1%	119	163	324	324	37%
	25	89.8%	268	168	594	459	45%
	39	89.8%	129	78	243	216	53%
	58	89.5%	296	383	582	510	51%
	74	89.3%	242	284	546	437	44%
	55	89.2%	1389	1598	1200	920	116%
	57	89.1%	436	451	764	582	57%
	59	89.1%	806	863	910	692	89%
Quartile 2	26	89.0%	650	741	796	644	82%
	97	88.9%	182	212	405	324	45%
	56	88.3%	441	454	728	546	61%
	11	88.1%	288	307	569	455	51%
	51	87.5%	135	107	443	443	30%
	64	87.1%	335	337	582	473	58%
	28	86.8%	70	166	432	648	16%
	2	86.7%	196	228	720	606	27%
	48	86.2%	438	457	655	582	67%
	61	85.9%	546	664	728	546	75%
	31	85.7%	29	62	297	297	10%
	66	85.7%	61	65	218	182	28%
	75	85.1%	103	106	546	437	19%
	9	84.9%	278	298	796	569	35%
	67	84.6%	75	62	218	218	34%
	18	84.5%	137	177	297	297	46%
	54	84.2%	472	503	692	510	68%
	71	84.0%	169	69	255	218	66%
	46	83.4%	477	859	920	800	52%
	94	83.3%	6	14	81	162	8%



**Title VI Compliance Monitoring Report**  
**August 2017**

Load Factor		Average Weekday – Fiscal Year 2017					
Q#	Route #	AM Peak Boardings	PM Peak Boardings	AM Peak Seats	PM Peak Seats	AM Load Factor	PM Load Factor
Quartile 3	63	83.1%	166	220	473	437	35%
	70	82.1%	323	274	946	837	34%
	60	81.8%	193	129	291	218	66%
	21	81.1%	106	74	189	162	56%
	100	80.6%	748	680	2288	1882	33%
	42	80.3%	111	90	378	297	29%
	78	80.0%	145	83	291	218	50%
	93	80.0%	17	11	162	162	11%
	5	79.8%	442	490	985	720	45%
	1	78.4%	390	523	644	417	60%
	12	77.1%	336	375	834	758	40%
	34	77.0%	653	677	910	682	72%
	81	75.0%	66	79	324	324	21%
	98	75.0%	88	89	432	324	20%
	90	74.6%	300	243	812	590	37%
	24	74.2%	183	85	303	265	60%
	47	72.1%	387	403	644	493	60%
	44	71.8%	66	50	324	324	20%
	23	71.6%	183	222	569	455	32%
Quartile 4	45	71.1%	263	261	648	486	41%
	96	71.0%	141	163	324	432	44%
	53	70.7%	152	116	378	324	40%
	37	70.6%	138	111	455	417	30%
	33	70.2%	147	124	531	493	28%
	76	69.8%	264	203	655	582	40%
	13	65.6%	106	119	341	379	31%
	36	65.5%	106	120	417	455	25%
	29	64.0%	176	184	351	324	50%
	6	63.2%	88	71	324	324	27%
	22	63.0%	154	125	569	493	27%
	52	60.0%	81	58	297	243	27%
	19	57.1%	88	49	190	227	47%
	30	56.1%	225	206	493	455	46%
	14	55.4%	250	248	569	455	44%
	4	51.4%	72	68	297	324	24%
	7	50.0%	23	16	108	108	21%
	32	33.3%	100	94	297	297	34%
	3	0.0%	26	12	81	81	33%
System Average						43.6%	50.6%
Standard Deviation						0.199718	0.3205554
Disparity Limit						63.5%	82.7%



#### 4.8. *Route Headways Detailed Results*

The purpose of this evaluation is to determine if the routes that provide service to the minority quartiles (1 and 2) have significantly less frequent service (longer headways) than the routes that provide service to the non-minority quartiles (3 and 4). The average headway was taken from the Fiscal Year 2017 service summary. The detailed results are shown on Table 4-9 on the next two pages.

**Table 4-9: Route Headway Detailed Results**

Quartile	% Minority	Route	Route Description	AM Avg Hdwy	Base Day 1200n	PM Avg Hdwy	Evng 900p
1	94.7%	43	Traville TC-Shady Grove-Hospital-Shady Grove	20	30	25	30
	94.1%	15	Langley Park-Wayne Ave.-Silver Spring	6	15	7	20
	93.9%	20	Hillandale-Northwest Park-Silver Spring	8	20	10	20
	93.8%	41	Aspen Hill-Weller Rd.-Glenmont	30	30	30	30
	93.3%	65	Montgomery Village-Shady Grove	30		30	
	92.5%	38	Wheaton-White Flint	20	30	25	30
	92.4%	17	Langley Park-Maple Ave.-Silver Spring	20	25	20	30
	92.3%	10	Twinbrook-Glenmont-White Oak-Hillandale	30	30	25	30
	91.8%	83	Germantown MARC-GTC-Waters Landing-Milestone-Holy Cross	30	30	30	30
	91.3%	79	Clarksburg-Skylark-Scenery-Shady Grove	30		30	
	91.1%	49	Glenmont-Layhill-Rockville	15	30	20	30
	90.8%	16	Takoma-Langley Park-Silver Spring	12	20	12	20
	90.1%	8	Wheaton-Forest Glen-Silver Spring	30	30	30	
	89.8%	25	Langley Park-Washington Adventist Hosp-Maple Ave-Takoma	15		15	
	89.8%	39	Briggs Chaney-Glenmont	30		30	
	89.5%	58	Lakeforest-Montgomery Ville-East Village-Shady Grove, Watkins Mill & MD355	25	30	25	30
	89.3%	74	GTC-Great Seneca Hwy.-Shady Grove	30	30	30	30
	89.2%	55	GTC-Milestone-MC,G-Lakeforest-Shady Grove-MC,R-Rockville	12	10	12	30
	89.1%	57	Lakeforest-Washington Grove-Shady Grove	20	20	20	30
	89.1%	59	Montgomery Village-Lakeforest-Shady Grove-Rockville	15	30	15	30
2	89.0%	26	Glenmont-Aspen Hill-Twinbrook-Montgomery Mall	15	30	15	30
	88.9%	97	GTC, Germantown MARC, Waring Station, GTC	15	30	15	30
	88.3%	56	Lakeforest-Quince Orchard-Shady Grove Hospital-Rockville	20	30	20	30
	88.1%	11	Silver Spring-East/West Hwy-Friendship Heights	9		15	
	87.5%	51	Norbeck P&R-Hewitt Ave.-Glenmont	30		30	
	87.1%	64	Montgomery Village-Quail Valley-Emory Grove-Shady Grove	25	30	25	30
	86.8%	28	Silver Spring Downtown (VanGo)	15	12	15	12
	86.7%	2	Lyttonsville-Silver Spring	25	30	20	30
	86.2%	48	Wheaton-Bauer Dr.-Rockville	25	25	20	30
	85.9%	61	GTC-Lakeforest-Shady Grove	20	30	20	30
	85.7%	31	Glenmont-Kemp Mill Rd.-Wheaton	30		30	
	85.7%	66	Shady Grove-Piccard Drive-Shady Grove Hospital-Traville TC	30		30	
	85.1%	75	Clarksburg-Correctional Facility-Milestone-GTC	30	30	30	
	84.9%	9	Wheaton-Four Corners-Silver Spring	20	30	20	30
	84.6%	67	Traville TC-North Potomac-Shady Grove	30		30	
	84.5%	18	Langley Park-Takoma-Silver Spring	30	30	30	30
	84.2%	54	Lakeforest-Washingtonian Blvd-Rockville	20	30	20	30
	84.0%	71	Kingsview-Dawson Farm-Shady Grove	30		30	
	83.4%	46	Shady Grove-Montgomery College-Rockville Pike-Medical Center	15	15	15	30
	83.3%	94	Germantown MARC-Clarksburg Meet the MARC Janaury 2014	25		25	



Table 4-10: Ride On Headway Analysis – August 2014

Quartile	% Minority	Route	Route Description	AM Avg Hdwy	Base Day 1200n	PM Avg Hdwy	Evng 900p
3	83.1%	63	Shady Grove-Gaither Road-Piccard Dr.-Rockville	30	30	30	
	82.1%	70	Milestone-Medical Center-Bethesda Express	12		15	
	81.8%	60	Montgomery Village-Flower Hill-Shady Grove	30		30	
	81.1%	21	Briggs Chaney-Tamarack-Dumont Oaks-Silver Spring	30		30	
	80.6%	100	GTC-Shady Grove	6	15	6	30
	80.3%	42	White Flint-Montgomery Mall	30	30	30	30
	80.0%	78	Kingsview-Richter Farm-Shady Grove	30		30	
	80.0%	93	Twinbrook-HHS-Twinbrook	30		30	
	79.8%	5	Twinbrook-Kensington-Silver Spring	10	30	12	30
	78.4%	1	Silver Spring-Leland St.-Friendship Heights	30	20	25	30
	77.1%	12	Takoma-Flower Avenue-Wayne Avenue-Silver Spring	15	30	15	30
	77.0%	34	Aspen Hill-Wheaton-Bethesda-Friendship Heights	15	30	15	30
	75.0%	81	Rockville-Tower Oaks-White Flint	30		30	
	75.0%	98	GTC, Kingsview, GCC, Cinnamon Woods	30	30	30	30
	74.6%	90	Damascus-Woodfield Rd- Airpark Shady Grove	20	30	20	
	74.2%	24	Hillandale-Northwest Park-Takoma	20		30	
	72.1%	47	Rockville-Montgomery Mall-Bethesda	25	30	25	30
	71.8%	44	Twinbrook-Hungerford-Rockville	30		30	
	71.6%	23	Sibley Hospital-Brookmont-Sangamore Road-Friendship Heights	25	30	30	30
4	71.1%	45	Fallsgrove-Rockville Senior Center-Rockville-Twinbrook	15	30	15	
	71.0%	96	Montgomery Mall-Rock Spring-Grosvenor	10	30	10	
	70.7%	53	Shady Grove-MGH-Olney-Glenmont	35		35	
	70.6%	37	Potomac-Tuckerman La.-Grosvenor-Wheaton	30		30	
	70.2%	33	Glenmont-Kensington-Medical Center	25		25	
	69.8%	76	Poolesville-Kentlands-Shady Grove	15	30	15	
	65.6%	13	Takoma-Manchester Rd.-Three Oaks Dr.-Silver Spring	25		30	
	65.5%	36	Potomac-Bradley Blvd.-Bethesda	30	30	30	
	64.0%	29	Bethesda-Glen Echo-Friendship Heights	30	30	30	35
	63.2%	6	Grosvenor-Parkside-Montgomery Mall Loop	30	30	30	
	63.0%	22	Hillandale-White Oak-FDA-Silver Spring	15		15	
	60.0%	52	MGH-Olney-Rockville	30		30	
	57.1%	19	Northwood-Four Corners-Silver Spring	30		30	
	56.1%	30	Medical Center-Pooks Hill-Bethesda	30	30	30	
	55.4%	14	Takoma-Piney Branch Road-Franklin Ave.-Silver Spring	30	30	30	
	51.4%	4	Kensington-Silver Spring	30		30	
	50.0%	7	Forest Glen-Wheaton	30		30	
	33.3%	32	Naval Ship R&D-Cabin John-Bethesda	32		30	
	0.0%	3	Takoma-Dale Dr.-Silver Spring	40		40	



#### 4.9. On-Time Performance Detailed Results

Table 4-11: Ride On On-Time Performance – Fiscal Year 2017

Quartile	Route	Route OTP	Quartile OTP	Quartile	Route	Route OTP	Quartile OTP
Quartile 1	43	93.9%	90.7%	Quartile 3	63	95.5%	91.0%
	15	89.8%			70	85.0%	
	20	84.8%			60	91.4%	
	41	92.0%			21	81.8%	
	65	97.4%			100	96.8%	
	38	92.9%			42	95.4%	
	17	89.7%			78	92.7%	
	10	87.4%			93	92.8%	
	83	95.8%			5	88.2%	
	79	85.1%			1	95.0%	
	49	91.7%			12	89.7%	
	16	82.9%			34	90.7%	
	8	85.7%			81	98.5%	
	25	93.9%			98	90.0%	
	39	88.4%			90	90.7%	
	58	93.7%			24	90.2%	
	74	93.0%			47	89.4%	
	55	89.2%			44	94.2%	
	57	94.5%			23	81.5%	
	59	91.5%					
Quartile 2	26	88.8%	89.8%	Quartile 4	45	94.2%	92.3%
	97	81.3%			96	95.8%	
	56	88.5%			53	92.2%	
	11	91.2%			37	95.0%	
	51	92.7%			33	88.4%	
	64	93.0%			76	92.7%	
	28	66.0%			13	86.2%	
	2	94.2%			36	90.8%	
	48	93.7%			29	95.2%	
	61	90.7%			6	97.5%	
	31	93.9%			22	87.6%	
	66	96.4%			52	91.7%	
	75	90.5%			19	87.7%	
	9	88.5%			30	95.9%	
	67	92.3%			14	88.6%	
	18	90.5%			4	92.5%	
	54	91.3%			7	98.9%	
	71	93.3%			32	86.8%	
	46	91.2%			3	96.2%	
	94	87.4%					



#### **4.10. Service Accessibility Detailed Results**

Using the 2010 census and the methodology described in Section 3.5, RIDE ON has utilized GIS to estimate the numbers of persons in Montgomery County that are within the transit service area for the Ride On and Metro Bus services. Table 4.11 below provides the numerical analysis. Figure 5-1 illustrates the minority populations served by the Ride On transit services and Figure 5-2 illustrates the low-income populations served by the Ride On transit services.

**Table 4-12: Ride On Service Accessibility Analysis – August 2014**

	Total Population	Minority Population	Non-Minority Population
Montgomery County	971,777	493,012	478,765
Transit Service Area	854,312	447,350	406,962
% of population within transit service area	87.9%	90.7%	85.0%





Figure 4-1: Ride On Service Area with Minority Population Concentrations by Block Group

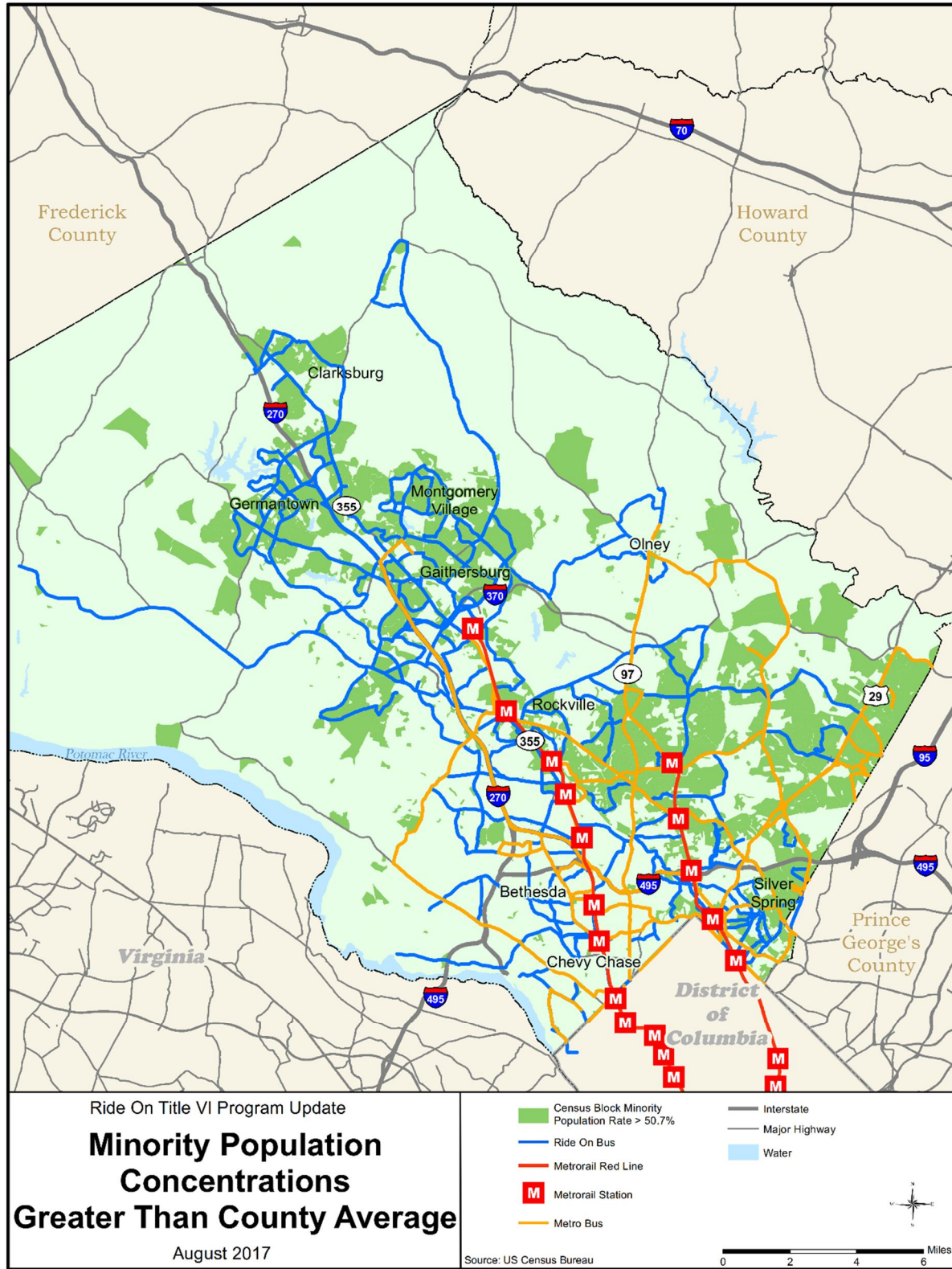
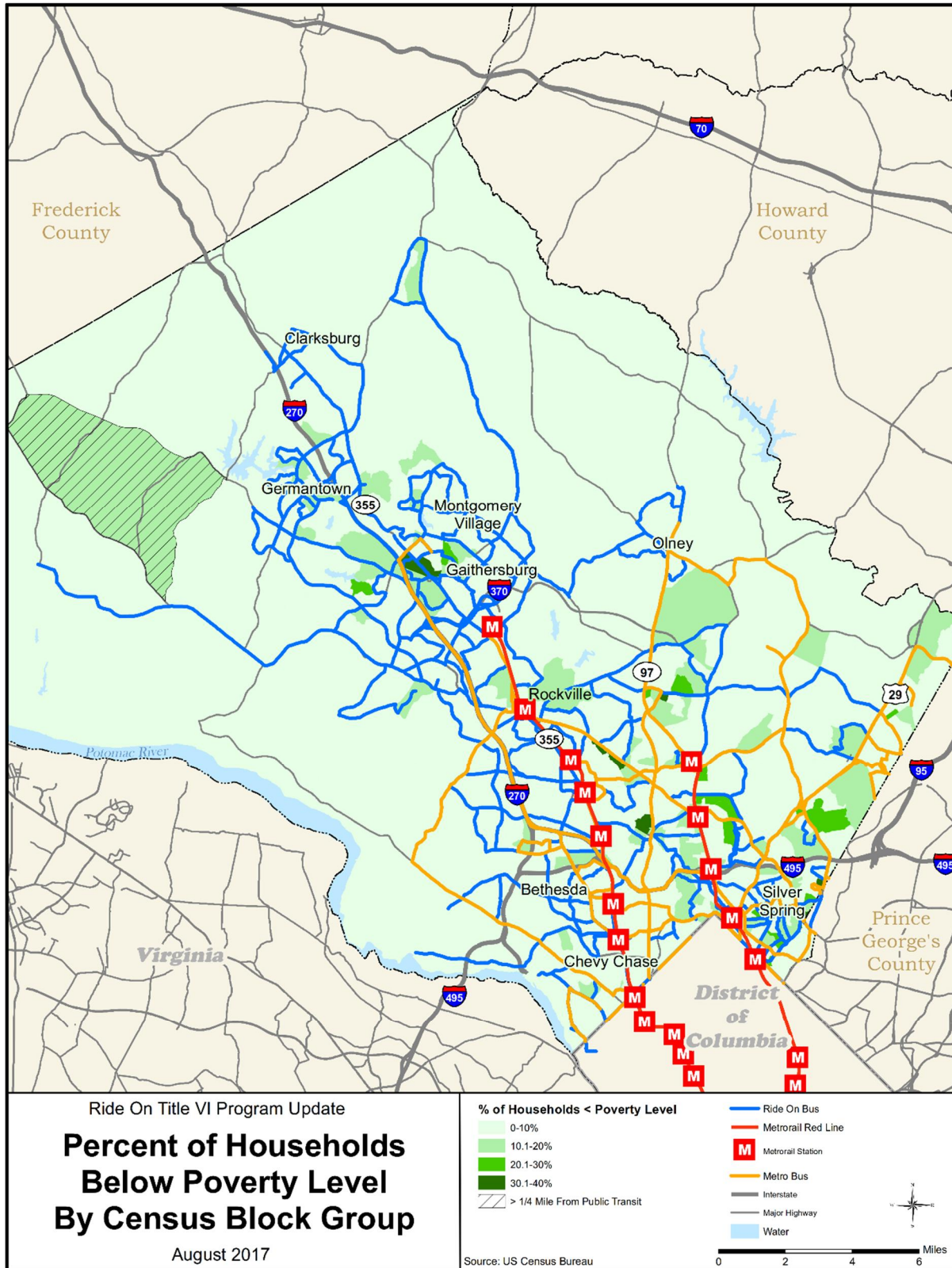




Figure 4-2: Ride On Service Area with Households below Poverty Level by Block Group



#### 4.11. Vehicle Assignment Detailed Results

Table 4-13: Ride On Average Bus Age by Route – April 26, 2017

Quartile	Route	Trips	Total Age	Route Average Age	Quartile Average Age
Quartile 1	43	76	812	10.7	6.70
	15	142	737	5.2	
	20	97	497	5.1	
	41	67	377	5.6	
	65	14	138	9.9	
	38	64	286	4.5	
	17	65	359	5.5	
	10	59	330	5.6	
	83	78	325	4.2	
	79	18	169	9.4	
	49	89	522	5.9	
	16	89	462	5.2	
	8	56	278	5	
	25	38	108	2.8	
	39	24	108	4.5	
	58	73	794	10.9	
	74	66	617	9.3	
	55	163	1136	7	
	57	98	1077	11	
	59	100	764	7.6	
Quartile 2	26	63	347	5.5	7.21
	97	53	227	4.3	
	56	79	844	10.7	
	11	33	164	5	
	51	20	141	7.1	
	64	71	611	8.6	
	28	91	339	3.7	
	2	58	357	6.2	
	48	89	706	7.9	
	61	83	726	8.7	
	31	22	155	7	
	66	14	146	10.4	
	75	58	520	9	
	9	65	401	6.2	
	67	15	161	10.7	
	18	55	151	2.7	
	54	81	927	11.4	
	71	16	150	9.4	
	46	122	764	6.3	
	94	14	108	7.7	



**Title VI Compliance Monitoring Report  
August 2017**

Quartile	Route	Trips	Total Age	Route Ave Age	Quartile Ave Age
Quartile 3	63	57	660	11.6	6.47
	70	62	299	4.8	
	60	17	174	10.2	
	21	15	103	6.9	
	100	182	1581	8.7	
	42	59	326	5.5	
	78	16	179	11.2	
	93	14	78	5.6	
	5	80	433	5.4	
	1	58	249	4.3	
	12	78	368	4.7	
	34	80	375	4.7	
	81	31	180	5.8	
	98	62	317	5.1	
	90	73	721	9.9	
	24	14	78	5.6	
	47	55	270	4.9	
	44	25	146	5.8	
	23	56	148	2.6	
Quartile 4	45	79	469	5.9	5.92
	96	59	361	6.1	
	53	31	175	5.6	
	37	27	152	5.6	
	33	31	192	6.2	
	76	66	643	9.7	
	13	18	81	4.5	
	36	43	231	5.4	
	29	64	402	6.3	
	6	58	278	4.8	
	22	35	95	2.7	
	52	21	133	6.3	
	19	10	58	5.8	
	30	42	253	6.0	
	14	51	286	5.6	
	4	26	78	3	
	7	12	92	7.7	
	32	28	158	5.6	
	3	6	48	8	



#### 4.12. Distribution of Transit Amenities

Transit amenities are mapped on Figures 4.3 and 4.4.

Figure 4-3: Ride On Stop Amenities Relative to Minority Population

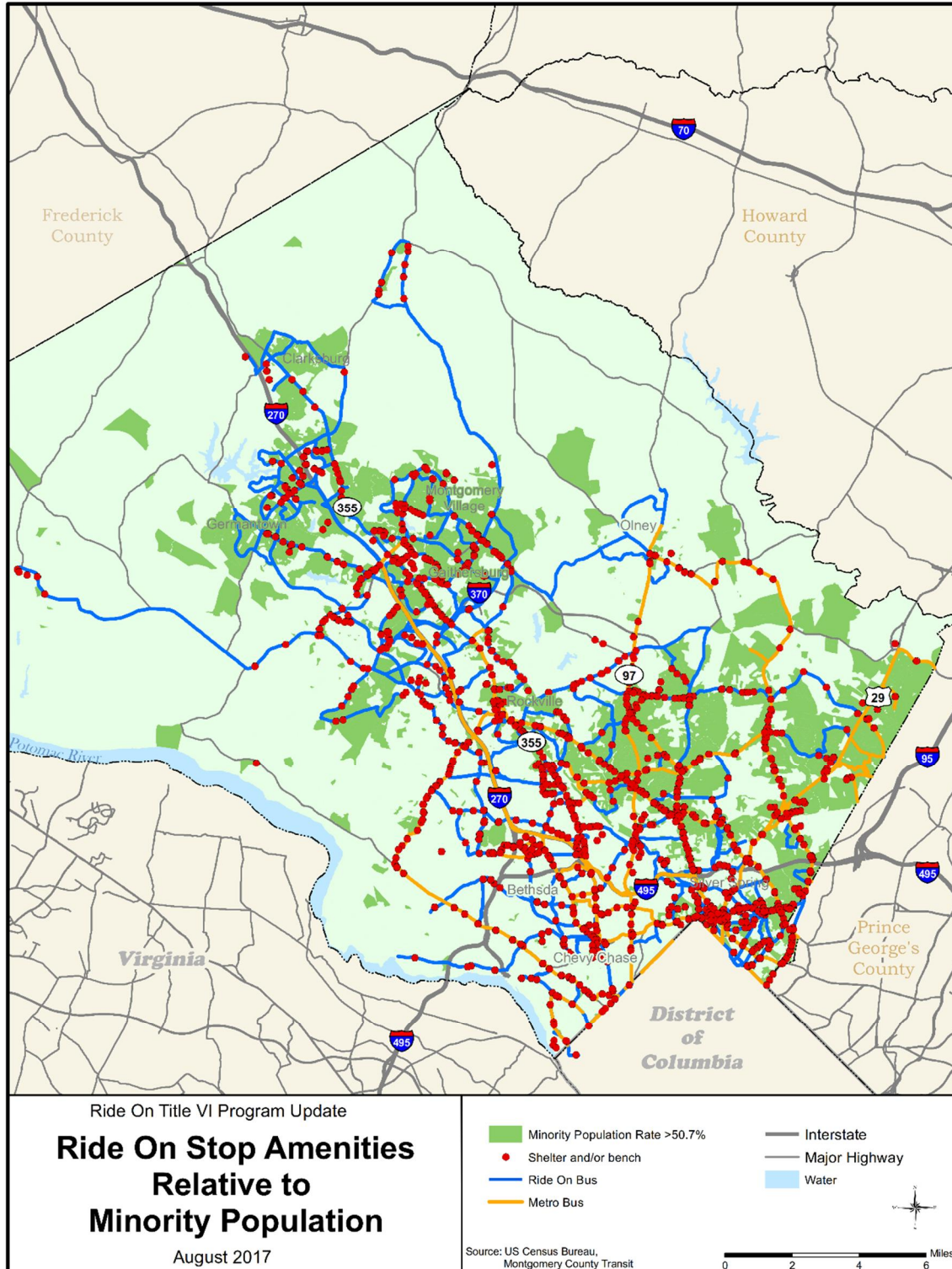




Figure 4-4: Ride On Stop Amenities Relative to Poverty Level Income

