MARYLAND DEPARTMENT OF TRANSPORTATION™

MARYLAND TRANSIT ADMINISTRATION

2026-2029 TITLE VI PROGRAM

May 2026

Holly Arnold
Administrator

Bart Plano
Director, Equal Opportunity Compliance Programs

Debra Johnson
Title VI/ADA Coordinator

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For more information, or to request this information in an alternate format or translated into another language, please contact the department listed below.

Para más información, o para pedir esta información en un formato alternativo o traducido a otro lenguaje, por favor contacte el departamento nombrado abajo.

MTA Office of Customer and Community Relations ● 410-767-3999 ● 866-743-3682 ● Maryland Relay 7-1-1.

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Approval Signature Pages

Title VI Program Approval

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Wes Moore
Governor
Aruna Miller
Lieutenant Governor
Kathryn Thomson
Secretary
Holly Arnold
Administrator

2026 – 2029 TITLE VI PROGRAM APPROVAL

SIGNATURE PAGE

I have received, considered, am aware of, and approve the Results of the Maryland Transit Administration (MDOT MTA) 2026 – 2029 Title VI Program.

Digitally signed by Holly Arnold. Date: 2026.06.01

Holly Arnold, Administrator
Maryland Transit Administration

6/01/2026
Date

401 E. Pratt Street, Baltimore, MD 21202 | 410.539.5000 | 1.866.RIDE.MTA | MD Relay 7-1-1 | mta.maryland.gov

Transit Service Monitoring Approval

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Wes Moore
Governor
Aruna Miller
Lieutenant Governor
Kathryn Thomson
Secretary
Holly Arnold
Administrator

2026 – 2029 TITLE VI PROGRAM APPROVAL

SIGNATURE PAGE

I have received, considered, am aware of, and approve the Results of the Maryland Transit Administration (MDOT MTA) Transit Service Monitoring.

Digitally signed by Holly Arnold. Date: 2026.06.01

Holly Arnold, Administrator
Maryland Transit Administration

06/01/2026
Date

401 E. Pratt Street, Baltimore, MD 21202 | 410.539.5000 | 1.866.RIDE.MTA | MD Relay 7-1-1 | mta.maryland.gov

Major Service Change, Disparate Impact, and Disproportionate Burden Policies Approval

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Wes Moore
Governor
Aruna Miller
Lieutenant Governor
Kathryn Thomson
Secretary
Holly Arnold
Administrator

2026 – 2029 TITLE VI PROGRAM APPROVAL

SIGNATURE PAGE

I have received, considered, am aware of, and approve the Results of the Maryland Transit Administration (MDOT MTA) major service change policy, disparate impact policy, and disproportionate burden policy.

Holly Arnold Digitally signed by Holly Arnold. Date: 2026.06.01
Holly Arnold, Administrator
Maryland Transit Administration

06/01/2026
Date

401 E. Pratt Street, Baltimore, MD 21202 | 410.539.5000 | 1.866.RIDE.MTA | MD Relay 7-1-1 | mta.maryland.gov

General Requirements

Title VI Notice to the Public

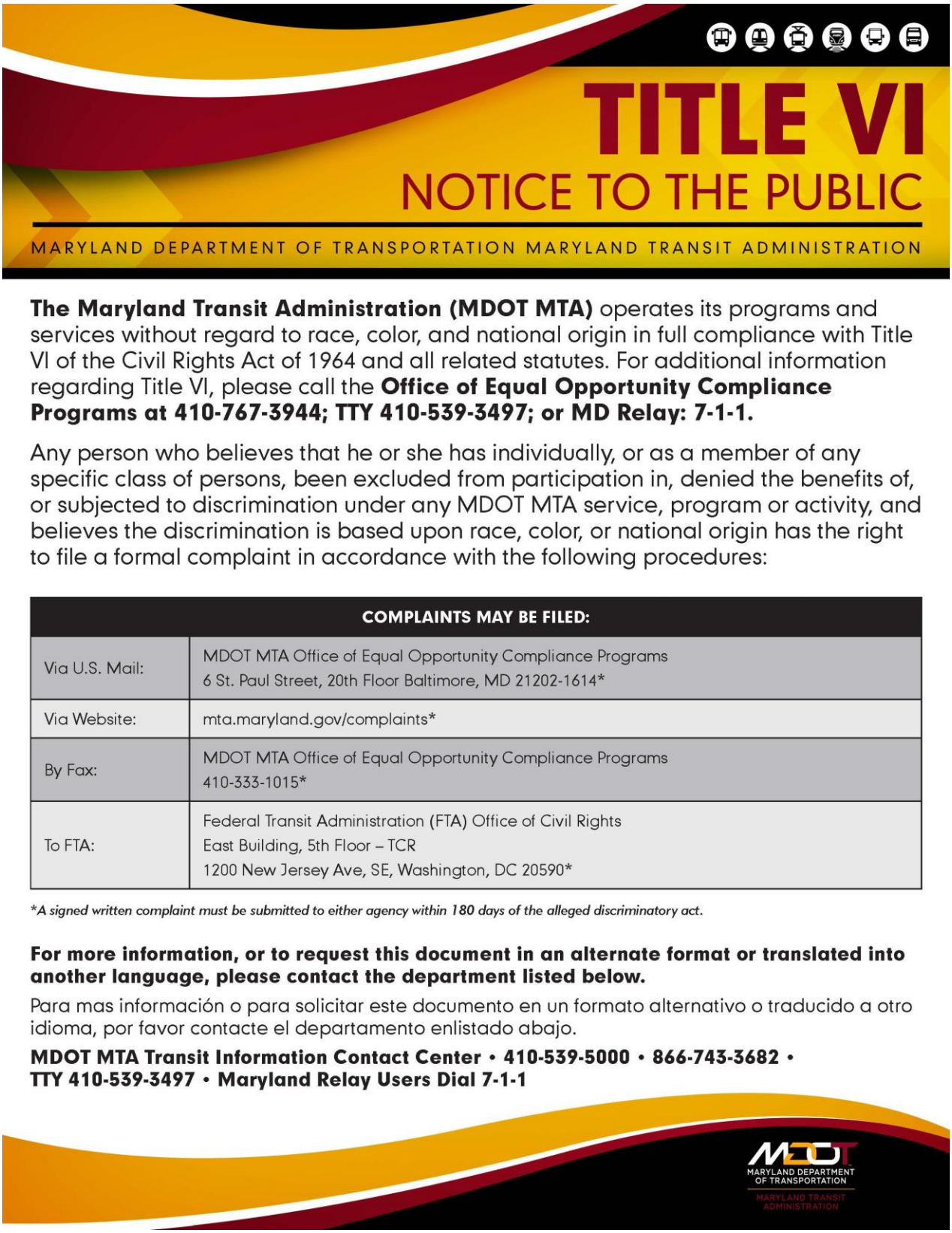
The Maryland Transit Administration (MDOT MTA) posts a notice to the public of rights under Title VI at the following locations:

- MDOT MTA administrative offices.
- Public areas of vehicle operations and maintenance facilities.
- The MDOT MTA website, on the agency's Title VI page: https://www.mta.maryland.gov/title-vi-civil-rights-act-1964.
- On at least seventy percent (70%) of all MDOT MTA-owned transit vehicles across modes.
- At no less than seventy percent (70%) of all MDOT MTA-owned transit stations across modes.

The MDOT MTA Title VI notice is posted in both English (**Figure 1**) and Spanish (**Figure 2**). **Figure 3** presents the Title VI Notice as a "car card," which is currently posted on Core Bus vehicles and as part of the implementation of this program is installed on MDOT MTA-owned transit vehicles for MARC, Light Rail, and Mobility. **Figure 4** shows the Title VI Notice as a Metro Subway station poster. **Figure 5** shows the Title VI car card prepared for Mobility. **Figure 6** shows the station poster of Title VI prepared for MARC stations. Finally, MDOT MTA also produces a Title VI brochure (Appendix D), which offers more detailed information on the meaning of Title VI, environmental justice, and how to file a complaint.

All of MDOT MTA's Title VI Notices contain information on how to obtain language assistance in English and Spanish, regardless of the format in which they appear (such as a poster, car card, or brochure).

Figure 1: Title VI Notice to the Public Poster – English



TITLE VI
NOTICE TO THE PUBLIC

MARYLAND DEPARTMENT OF TRANSPORTATION MARYLAND TRANSIT ADMINISTRATION

The Maryland Transit Administration (MDOT MTA) operates its programs and services without regard to race, color, and national origin in full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. For additional information regarding Title VI, please call the **Office of Equal Opportunity Compliance Programs at 410-767-3944; TTY 410-539-3497; or MD Relay: 7-1-1.**

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, denied the benefits of, or subjected to discrimination under any MDOT MTA service, program or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint in accordance with the following procedures:

COMPLAINTS MAY BE FILED:	
Via U.S. Mail:	MDOT MTA Office of Equal Opportunity Compliance Programs 6 St. Paul Street, 20th Floor Baltimore, MD 21202-1614*
Via Website:	mta.maryland.gov/complaints*
By Fax:	MDOT MTA Office of Equal Opportunity Compliance Programs 410-333-1015*
To FTA:	Federal Transit Administration (FTA) Office of Civil Rights East Building, 5th Floor – TCR 1200 New Jersey Ave, SE, Washington, DC 20590*

**A signed written complaint must be submitted to either agency within 180 days of the alleged discriminatory act.*

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

Para mas información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte el departamento enlistado abajo.

MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • TTY 410-539-3497 • Maryland Relay Users Dial 7-1-1

MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Figure 2: Title VI Notice to the Public Poster – Spanish



TÍTULO VI
NOTIFICACIÓN PÚBLICA

DEPARTAMENTO DE TRANSPORTE DE MARYLAND ADMINISTRACIÓN DE TRÁNSITO DE MARYLAND

La Administración de Tránsito de Maryland (MDOT MTA) opera sus programas y servicios sin distinción de raza, color y origen nacional, en total conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. Para obtener información adicional sobre el Título VI, llame a la **Oficina de Programas de Cumplimiento de Igualdad de Oportunidades (en inglés: Office of Equal Opportunity Compliance Programs) al 410-767-3944; TTY 410-539-3497; o MD Relay: 7-1-1.**

Cualquier persona que crea que él o ella, individualmente o como miembro de una clase específica de personas, ha sido excluida de la participación, se le han denegado los beneficios o ha sido discriminada bajo cualquier servicio, programa o actividad de MDOT MTA, y que crea que la discriminación se basa en la raza, el color o el origen nacional, tiene el derecho de presentar una queja formal de acuerdo con los siguientes procedimientos:

LAS QUEJAS PUEDEN SER PRESENTADAS:	
Por correo de EE.UU.:	MDOT MTA Office of Equal Opportunity Compliance Programs 6 St. Paul Street, 20th Floor Baltimore, MD 21202-1614*
Vía sitio web:	mta.maryland.gov/complaints*
Por fax:	MDOT MTA Office of Equal Opportunity Compliance Programs 410-333-1015*
Escribiendo a la FTA:	Federal Transit Administration (FTA) Office of Civil Rights East Building, 5th Floor – TCR 1200 New Jersey Ave, SE, Washington, DC 20590*

**Una queja por escrito firmada debe presentarse a cualquiera de las agencias dentro de los 180 días del presunto acto discriminatorio.*

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

Para mas información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte el departamento enlistado abajo.

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MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Figure 3: Core Bus and Light Rail Car Card Title VI Notice – English and Spanish



TITLE VI NOTICE TO THE PUBLIC

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

The Maryland Transit Administration (MDOT MTA) operates its programs and services without regard to race, color, and national origin in full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. For additional information regarding Title VI, please call the **Office of Equal Opportunity Compliance Programs at 410-767-3944 or MD Relay: 7-1-1.**

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, denied the benefits of, or subjected to discrimination under any MDOT MTA service, program or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint in accordance with the following procedures:

Via U.S. Mail: MDOT MTA Office of Equal Opportunity Compliance Programs, 6 St. Paul St, 20th Floor Baltimore, MD 21202-1614.*
Via Website: mta.maryland.gov/complaints.* **By Fax**: MDOT MTA Office of Equal Opportunity Compliance Programs 410-333-1015.*
To FTA: Federal Transit Administration Office of Civil Rights. East Building, 5th floor – TCR, 1200 New Jersey Ave, SE, Washington, DC 20590*

A signed written complaint must be submitted to either agency within 180 days of the alleged discriminatory act.

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MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • MD Relay Users Dial 7-1-1

TÍTULO VI NOTIFICACIÓN PÚBLICA

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

La Administración de Tránsito de Maryland (MDOT MTA) opera sus programas y servicios sin distinción de raza, color y origen nacional, en total conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. Para obtener información adicional sobre el Título VI, llame a la **Oficina de Programas de Cumplimiento de Igualdad de Oportunidades (en inglés: Office of Equal Opportunity Compliance Programs) al 410-767-3944; o MD Relay: 7-1-1.**

Cualquier persona que crea que, individualmente o como miembro de una clase específica de personas, ha sido excluida de la participación, se le han denegado los beneficios o ha sido objeto de discriminación bajo cualquier servicio, programa o actividad de la MDOT MTA, y cree que la discriminación se basa en la raza, el color o el origen nacional, tiene el derecho de presentar una queja formal de acuerdo con los siguientes procedimientos:

Vía Correo de EE. UU.: Oficina de Programas de Cumplimiento de Igualdad de Oportunidades de la MDOT MTA, 6 St. Paul St, 20th Floor Baltimore, MD 21202-1614.* **A través del sitio web:** mta.maryland.gov/complaints.* **Por fax:** oficina de la MDOT MTA de Programas de Cumplimiento de Igualdad de Oportunidades en el 410-333-1015.* **A la TLC:** Oficina Federal de Administración de Tránsito de Derechos Civiles. East Building, 5th floor – TCR, 1200 New Jersey Ave, SE, Washington, DC 20590*

***Debe presentarse una queja por escrito firmada a cualquiera de las agencias dentro de los 180 días del supuesto acto discriminatorio.**

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

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MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • MD Relay Users Dial 7-1-1

Figure 4: Metro Subway Station Poster Title VI Notice – English and Spanish



Figure 5: Mobility Car Card Title VI Notice



TITLE VI
NOTICE TO THE PUBLIC

MARYLAND DEPARTMENT OF TRANSPORTATION MARYLAND TRANSIT ADMINISTRATION

The Maryland Transit Administration (MDOT MTA) operates its programs and services without regard to race, color, and national origin in full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. For additional information regarding Title VI, please call the **Office of Equal Opportunity Compliance Programs at 410-767-3944; TTY 410-539-3497; or MD Relay: 7-1-1.**

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, denied the benefits of, or subjected to discrimination under any MDOT MTA service, program or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint in accordance with the following procedures:

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Via Website:	mta.maryland.gov/complaints*
By Fax:	MDOT MTA Office of Equal Opportunity Compliance Programs 410-333-1015*
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**A signed written complaint must be submitted to either agency within 180 days of the alleged discriminatory act.*

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

Para mas información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte el departamento enlistado abajo.

MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • TTY 410-539-3497 • Maryland Relay Users Dial 7-1-1

MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

TÍTULO VI
NOTIFICACIÓN PÚBLICA

DEPARTAMENTO DE TRANSPORTE DE MARYLAND ADMINISTRACIÓN DE TRÁNSITO DE MARYLAND

La Administración de Tránsito de Maryland (MDOT MTA) opera sus programas y servicios sin distinción de raza, color y origen nacional, en total conformidad con el Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. Para obtener información adicional sobre el Título VI, llame a la **Oficina de Programas de Cumplimiento de Igualdad de Oportunidades (en inglés: Office of Equal Opportunity Compliance Programs) al 410-767-3944; TTY 410-539-3497; o MD Relay: 7-1-1.**

Cualquier persona que crea que él o ella, individualmente o como miembro de una clase específica de personas, ha sido excluida de la participación, se le han denegado los beneficios o ha sido discriminada bajo cualquier servicio, programa o actividad de MDOT MTA, y que crea que la discriminación se basa en la raza, el color o el origen nacional, tiene el derecho de presentar una queja formal de acuerdo con los siguientes procedimientos:

LAS QUEJAS PUEDEN SER PRESENTADAS::	
Por correo de EE.UU.:	MDOT MTA Office of Equal Opportunity Compliance Programs 6 St. Paul Street, 20th Floor Baltimore, MD 21202-1614*
Vía sitio Web:	mta.maryland.gov/complaints*
Por Fax:	MDOT MTA Office of Equal Opportunity Compliance Programs 410-333-1015*
Escribiendo a la FTA:	Federal Transit Administration (FTA) Office of Civil Rights East Building, 5th Floor – TCR 1200 New Jersey Ave, SE, Washington, DC 20590*

**Una queja por escrito firmada debe presentarse a cualquiera de las agencias dentro de los 180 días del presunto acto discriminatorio.*

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

Para mas información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte el departamento enlistado abajo.

MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • TTY 410-539-3497 • Maryland Relay Users Dial 7-1-1

MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Figure 6: MARC Station Poster Title VI Notice



Title VI Complaint Procedures

MDOT MTA participates in the Maryland Department of Transportation's Title VI Complaint Procedures and also has its own process. Any person who believes that he or she has, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or subjected to discrimination under any MDOT MTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint in accordance with the following procedures. Individuals may file a Title VI complaint up to 180 days from the date of the alleged discrimination, by completing and submitting the agency's Title VI Complaint Form to MTA's Office of Equal Opportunity Compliance Programs. For more information or assistance on filing a complaint, please call the MTA Office of Equal Opportunity Compliance Programs at 410-767-3944; TTY 410-539-3497; or MD Relay: 7-1-1.

The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.

The complaint may be filed in writing to:

Office of Equal Opportunity Compliance Programs

Maryland Transit Administration

6 Saint Paul Street

Baltimore, Maryland 21202

Complaint forms may be faxed to MTA's Office of Equal Opportunity Compliance Programs at: 410-333-1015.

A person may also file a complaint directly with the Federal Transit Administration at:

FTA Office of Civil Rights

1200 New Jersey Avenue SE

Washington, DC 20590

Once the complaint is received, MDOT MTA will review it to determine if EOCP has jurisdiction. The complainant will receive an acknowledgement letter informing her or him whether the complaint will be investigated by EOCP.

MDOT MTA has 60 days to investigate the complaint. If more information is needed to resolve the complaint, MDOT MTA may contact the complainant. The complainant has 15 days from the date of the letter to send the requested information to the investigator assigned to the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 15 days, MDOT MTA may administratively close the complaint. A complaint also may be administratively closed if the complainant no longer wishes to pursue the complaint.

After the investigator reviews the complaint, she or he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations, states that there was not a Title VI violation, and that the complaint will be closed. A LOF summarizes the allegations and the interviews regarding the alleged

incident and explains the actions of the agency in response to the findings. If the complainant wishes to appeal the decision, she or he has 10 days after the date of the closure letter or the LOF to submit a written request to the Administrator of MDOT MTA, or their designee, as specified in the closure letter or the LOF.

Title VI Investigations, Complaints, and Lawsuits

MDOT MTA evaluated two Title VI complaints in the period of the 2023-2026 Title VI Program. A full record of Title VI complaints and investigations is summarized in **Table 1**.

Table 1: Title VI Investigations, Complaints, and Lawsuits

Party Handling	Date Complaint Opened	Complaint Summary	Status
MDOT MTA	September 15, 2025	The complainant believed she and her husband were bypassed at bus stop because she is transgender.	Closed as of October 20, 2025. Based on the information provided, concerns do not fall within the scope of Title VI protections.

Source: MDOT MTA

Title VI Policy Statement

Appendix B presents MDOT MTA's official Title VI Policy Statement, distributed to all MDOT MTA employees by Administrator Holly Arnold in April 2026.

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MDOT MTA Non-Elected Advisory Committees

MDOT MTA has three non-elected advisory committees:

- Citizens Advisory Committee (CAC).
- Citizens Advisory Committee for Accessible Transportation (CACAT).
- MARC Riders Advisory Council (RAC).

MDOT MTA actively encourages minority representation on the CAC, CACAT, and RAC. The agency publicizes committee recruitment via its website, on vehicles and in stations. It also directly reaches out to community-based organizations to increase awareness of the committees and solicit applications for new members. The MDOT MTA Office of Planning and Programming also maintains a list of community-based organizations used in public outreach.

Citizens Advisory Committee

The Citizens Advisory Committee (CAC) focuses on providing feedback on MDOT MTA's Core Bus, Light Rail, and Metro Subway services located in the Baltimore region. Candidates to serve on the CAC are recruited from the general public through various forms of advertisement. Candidates must be 21 years of age, residents of the MDOT MTA service area, possess familiarity with MDOT MTA services, and be committed to active participation on the committee. Candidates are interviewed by a panel comprised of MDOT MTA staff and are selected for appointment to the CAC from a list of finalists by the MDOT MTA Administrator. The CAC meetings are held the third Tuesday of the month from 1:00 p.m. to 2:00 p.m. All CAC meetings are open to the public and members of the public are invited to attend. Meetings are virtual and accessible via Microsoft Teams and phone dial-in. The meeting link and phone number are published on the MTA website a week before the scheduled meeting.

The CAC is required to have at least nine, but no more than 15 members appointed per calendar term. If the CAC's membership falls below the nine-member threshold, the MDOT MTA Administrator reserves the right to appoint additional members outside of the scheduled recruitment window to obtain the necessary quorum. All members appointed to the CAC serve a two-year term; however, members may reapply for membership at the conclusion of their term. Members may serve terms in succession but shall not exceed three consecutive terms of membership on the CAC.

Citizens Advisory Committee for Accessible Transportation

The Citizens Advisory Committee for Accessible Transportation (CACAT) provides feedback to ensure that MDOT MTA's Core Bus, Light Rail, Metro Subway, and Mobility services are reliable, affordable, convenient, and accessible for customers. The CACAT follows the same set of requirements as the CAC: candidates, recruited through various forms of advertisement, must be 21 years of age, residents of the MDOT MTA service area, possess familiarity with MDOT MTA services, and be committed to active participation on the committee. Candidates apply on-line, are interviewed by a panel of MDOT MTA staff and then selected for appointment to the CACAT from a list of finalists by the MDOT MTA Administrator. The CACAT meetings are held on the third Thursday of the month from 1:00 p.m. to 2:00 p.m. All CACAT meetings are open to the public and members of the public are invited to attend. Meetings are virtual and accessible

via Microsoft Teams and phone dial-in. The meeting link and phone number are published on the MTA website a week before the scheduled meeting.

Like the CAC, the CACAT is required to have at least nine, but no more than 15 members appointed per calendar term. If the CACAT membership falls below the nine-member threshold, the MDOT MTA Administrator reserves the right to appoint additional members outside of the scheduled recruitment window to obtain the necessary quorum. All members appointed to the CACAT serve a two-year term; however, members may reapply for membership at the conclusion of their term. Members may serve terms in succession but shall not exceed three consecutive terms of membership on the CACAT.

MARC Riders Advisory Council

The MARC Riders Advisory Council (RAC) is an independent body that strives to assist the MDOT MTA with improving MARC service. The Council is composed of 19 regular MARC Commuter Rail riders from all three MARC lines, along with representatives from MDOT MTA, CSX, Amtrak, and Alstom Transportation, Inc. Customers are solicited to join the MARC RAC by notices distributed via e-mail, website postings, and flyers handed out at stations and on the trains. Interested riders are directed to fill out an online application to join the RAC; MARC then selects applicants to interview by phone or in-person. Following the interviews, MARC and MDOT MTA management make recommendations on appointments, with the MDOT MTA Administrator making final appointment decisions. The MARC RAC meets on the second Thursday of the month from 4:30 p.m. to 6:00 p.m. Meetings are open to the public and held virtually.

Minority Representation on Committees

Table 3 compares the racial breakdown of each of MDOT MTA's three committees as of February 2026 to the approximate rider profile of each of MDOT MTA's services (sourced from the various origin-destination studies completed by mode as well as the most recent Customer Satisfaction Study). Of the three committees, the CACAT has the highest percentage of non-white representation.

MDOT MTA committees are aware of the need to increase minority representation. During recruitment periods, CAC and CACAT managing staff place English and Spanish car cards advertising committee membership on MDOT MTA buses and trains, in rail stations, and on the MDOT MTA website. See Appendix C for a car card image and a CAC recruitment ad in English and Spanish. Additionally, to further encourage the participation of minorities on such committees, staff from MDOT MTA's Office of Customer and Community Relations e-mails and sends letters to various community-based organizations, institutions, and government agencies, including the entities shown in **Table 2**. MDOT MTA staff from the offices of Equal Opportunity Compliance Programs and Customer and Community Relations will continue to monitor and examine efforts to encourage the participation of minorities on advisory committees.

Table 2: CAC and CACAT Recruitment Contact Entities

Entity	Committee Contact
Greater Greenmount	Citizens Advisory Committee
Morgan State University	Citizens Advisory Committee
Glen Neighborhood Improvement Association	Citizens Advisory Committee
Hilltop 4100 Neighborhood	Citizens Advisory Committee
City of Baltimore – Department 0f Transportation	Citizens Advisory Committee
Allendale Community Association	Citizens Advisory Committee
Greater Severna Park Council	Citizens Advisory Committee
West Arlington Improvement Association	Citizens Advisory Committee
Lakeland Community Association	Citizens Advisory Committee
Frankford Improvement	Citizens Advisory Committee
Hamilton Hills Neighborhood Association	Citizens Advisory Committee
City of Baltimore – Neighborhood Liaison	Citizens Advisory Committee
Towson University	Citizens Advisory Committee
Greater Northwood Covenant Association	Citizens Advisory Committee
Governor's Commission on African Affairs	Citizens Advisory Committee
Governor's Commission on Asian Pacific American Affairs	Citizens Advisory Committee
Governor's Commission on Hispanic Affairs	Citizens Advisory Committee
Governor's Commission on Middle Eastern American Affairs	Citizens Advisory Committee
Governor's Commission on South Asian American Affairs	Citizens Advisory Committee
Maryland Commission on African American History and Culture	Citizens Advisory Committee
Maryland Commission on Indian Affairs	Citizens Advisory Committee
Governor's Commission on Hispanic Affairs	Citizens Advisory Committee for Accessible Transportation
Emerge	Citizens Advisory Committee for Accessible Transportation
Associated Catholic Charities	Citizens Advisory Committee for Accessible Transportation
Kennedy Krieger Institute	Citizens Advisory Committee for Accessible Transportation
The League for People with Disabilities	Citizens Advisory Committee for Accessible Transportation
Humanim	Citizens Advisory Committee for Accessible Transportation
The Arc of Baltimore	Citizens Advisory Committee for Accessible Transportation
National Federation of the Blind	Citizens Advisory Committee for Accessible Transportation
Image Center	Citizens Advisory Committee for Accessible Transportation
Maryland Hispanic Chamber of Commerce	Citizens Advisory Committee for Accessible Transportation
Latino Providers Network	Citizens Advisory Committee for Accessible Transportation

Table 3: Racial Composition of MTA Advisory Committees Compared to MDOT MTA Rider Profile

Body/Rider Profile		Race/Ethnicity						
		Caucasian	African American	Hispanic/ Latino	Asian	Multiracial	American Indian/Alaskan Native	Other
Body	*Citizens Advisory Committee*	81.8%	18.2%	-	-	-	-	-
	Citizens Advisory Committee for Accessible Transportation	25.0%	62.5%	-	-	12.5%	-	-
	MARC Riders Advisory Council	57.9%	15.8%	5.3%	10.5%	10.5%	-	-
Rider Profile	*Core Bus*	11.3%	81.0%	3.2%	1.0%	2.5%	0.8%	0.2%
	Commuter Bus	38.8%	42.5%	7.6%	6.6%	3.3%	0.8%	0.4%
	MARC	46.1%	36.2%	5.8%	8.2%	2.5%	0.4%	0.8%
	Light Rail	20.8%	71.0%	1.4%	1.2%	3.7%	0.5%	0.3%
	Metro Subway	10.8%	82.5%	2.9%	0.4%	2.7%	0.4%	0.3%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024); CAC, CACAT, and RAC Demographic Data (2026)

Subrecipient Compliance and Monitoring

MDOT MTA has lead responsibility for the administration and oversight of FTA grant funding that is passed through to Maryland subrecipients (local units of government and non-profit organizations). Primary responsibility for administration and oversight activities related to subrecipients resides in the MDOT MTA's Office of Local Transit Support (OLTS). This responsibility includes decisions regarding the distribution of funds as well as program regulatory compliance oversight. The process described in this section is applied to subrecipients who receive funds from FTA Federal funding programs to comply with Title VI. On issues specifically pertaining to Title VI, OLTS staff also work with members of MDOT MTA's Office of Equal Opportunity Compliance Programs (EOCP) to ensure subrecipients' compliance with FTA regulations.

Statewide Transportation Planning Process for Subrecipients

Each subrecipient develops and maintains a demographic profile of its service area that includes identification of the locations of socioeconomic groups, including low-income, limited English proficiency (LEP), and minority populations, as covered by the Executive Order on Environmental Justice and Title VI.

The OLTS staff collects demographic profiles of the jurisdictions in which subrecipients operate through the statewide transportation planning process. The statewide transportation planning process is conducted as a compilation of several different existing planning processes. Each local jurisdiction that operates public transit is required to have a Transportation Development Plan (TDP). The planning process used to develop this document specifically works to identify the needs of low-income, LEP, and minority populations within each jurisdiction. In addition, as specified in authorizing legislation for federal programs, MDOT MTA has completed a locally developed, coordinated public transit human services transportation plan for each region in Maryland (with the exception of the Washington region, in which programs are administered by the Metropolitan Washington Council of Governments).

This planning process is documented in the State Management Plans (SMP) for the Section 5307, 5310, 5311, and 5339 programs. These documents are supplemented with input and data received during other planning processes, such as the development of the Maryland Consolidated Transportation Plan (CTP), the Maryland Transportation Plan (MTP), the Transportation Improvement Program (TIP), and the Statewide Transportation Improvement Program (STIP). Collectively, these documents investigate unmet transportation needs of individuals with disabilities, older adults, LEP residents, and low-income residents, specifically those seeking employment. They serve as primary planning tools to inform programming decisions.

Subrecipient Monitoring Procedures – Federal Funding Programs (Section 5310)

Program evaluation and monitoring are necessary to ensure that the MDOT MTA's Section 5310 subrecipients meet federal and state requirements. Local subrecipients are required to sign and submit annual certifications and assurances to MDOT MTA/OLTS, who actively monitor use of funding. OLTS monitors subrecipients through informal observation and review, auditing compliance with federal and state requirements (such as Title VI), and enforcement of requirements when a subrecipient is found to be deficient. OLTS and EOCP collaboratively monitor and review Locally Operated Transit Systems' (LOTS) service performance, including EOCP review of subrecipients' Title VI plans.

MDOT MTA conducts oversight of federal funding subrecipients (including through Section 5307 and 5310) through the following procedures:

- Reporting requirement: To provide for the efficient administration of FTA funding, subrecipients must report basic operating and financial data on at least a quarterly basis, as described in documents such as the State Management Plan and the Section 5310 Service Manual.
- Subrecipient annual grant applications: OLTS requires each subrecipient to submit grant application every two years providing detailed program descriptions and information demonstrating compliance with federal and state requirements (including Title VI), as well as certifications and assurances.
- Subrecipient Title VI Program: As part of the grant application process, OLTS requires the submittal of a Title VI Program to be included with the application, or as part of a separate submittal, if the subrecipient is a new grantee.
- Subrecipient compliance reviews: OLTS maintains a policy of conducting full compliance reviews of each of the Section 5310 subrecipients in the State of Maryland. These reviews occur at least once over the life of the subrecipients' fixed assets to ensure FTA program requirements, including Title VI, are being followed.
- Periodic site visits: Periodic site visits are conducted by OLTS staff to provide technical assistance and to review program accomplishments and management. During these visits, OLTS staff monitors subrecipients' maintenance of federally funded vehicles and facilities (where applicable). Specifically, for vehicles, spot checks are made by pulling vehicle records to ensure compliance with state standards and guidelines required to meet manufacturer-established maintenance intervals. OLTS also monitors subrecipients' posting of Title VI policy statements and maintenance of Title VI Programs. As LOTS post Title VI notices on vehicles, this includes spot-checks of vehicles during periodic visits.
- Identification of subrecipients' common and program-specific deficiencies: On a periodic basis, OLTS reviews all compliance oversight activities that have occurred over the prior year to identify common, and program specific deficiencies found for its subrecipients. The review helps determine new training opportunities, outstanding subrecipient deficiency findings for follow-up, and new areas of compliance emphasis at quarterly meetings.
- Establishment and maintenance of an active review process: OLTS ensures subrecipients implement timely actions and plans required to resolve deficiencies identified in specific FTA program requirement reviews by establishing achievable and mutually agreed-upon deadlines, conducting as-needed and programmed status meetings, and providing sample templates and acceptable program-specific information to subrecipients. Failure of subrecipients to meet deadlines is reviewed on a case-by-case basis to determine further remedial or corrective actions.
- Ongoing subrecipient training and education: Mandatory training is provided to 5310 subrecipients yearly, including a review of Title VI compliance requirements. OLTS also provides periodic monitoring of subrecipients' compliance with new program requirements.

A schedule of the most recently conducted subrecipient triennial reviews is shown in **Table 4**.

Table 4: Section 5310 Compliance Reviews

Subrecipient	Most Recent Compliance Review	Upcoming Compliance Review
Action in Maturity	February 6, 2026	In process
Alleghany HRDC	July 19, 2019	Summer 2026
Appalachian Parent Association	July 19, 2019	Summer 2026
Associated Catholic Charities	June 25, 2019	Summer 2026
Athelas	September 22, 2023	February 2029
Bayside Community Network	Prior grantee, new award FY 22/23	Spring 2026
Chesterwye Center	New grantee FY 22/23	Spring 2026
Comprehensive Housing Assistance, Inc.	Prior grantee, new award FY 24/25	Spring 2026
Daybreak Adult Day Services	September 18, 2012	Spring 2026
Delmarva Community Services (DCS)	December 13, 2022	Winter 2026/2027
Dove Pointe. Inc.	November 20, 2019	Summer 2026
Easter Seals Baltimore	June 25, 2019	Summer 2026
Harford Center	Unavailable	Spring 2026
Hopkins Elderplus	May 15, 2019	Summer 2026
LifeBridge Health	October 26, 2011	Spring 2026
Lifestyles of MD	February 20, 2020	Fall 2026
Partners In Care (PIC)	May 21, 2019	Summer 2026
Progress Unlimited Inc.	July 24, 2013	Spring 2026
Providence Center	Unavailable	Spring 2026
Richcroft, Inc.	New grantee FY 24/25	Spring 2026
Sheppard Pratt	August 1, 2013	Spring 2026
Spring Dell	February 20, 2020	Fall 2026
St. Mary's Adult Medical Day Care, Inc.	February 11, 2011	Spring 2026
St. Mary's Nursing Center	February 11, 2011	Spring 2026
The Arc of Carroll County	July 25, 2019	Summer 2026
The ARC of Central Chesapeake	August 19, 2010	Spring 2026
The ARC of Northern Chesapeake	October 25, 2012	Spring 2026
The Arc of Southern Maryland	Unavailable	Spring 2026
The League for People with Disabilities	April 18, 2014	Spring 2026
Unified Community Connections	August 2, 2013	Spring 2026
Washington County CAC	June 19, 2012	Spring 2026
Worcester County Comm on Aging	November 19, 2019	Summer 2026
Worcester County Developmental Center	November 19, 2019	Summer 2026
Friends Aware	July 19, 2019	By December 2029
Somerset Community Services	November 20, 2019 under prior award	By December 2029

Subrecipient	Most Recent Compliance Review	Upcoming Compliance Review
Lower Shore Enterprises	New award FY 26/27	By December 2029
Dorchester County Commission on Aging/Pleasant Day	Prior grantee, new award FY 26/27	By December 2029
Meritus Health	Prior grantee, new award FY 26/27	By December 2029
Nuwave	New Grantee	By December 2029

Source: MDOT MTA – Office of Local Transit Support

Subrecipient Monitoring Procedures – Locally Operated Transit Systems (LOTS)

Applicants selected for Section 5307, 5311, and 5339 (previously inclusive of 5309), CARES, CRRSAA, and ARPA federal funding must enter into a grant agreement with MDOT MTA. Local government or transit agency applicants are required to provide Title VI information to MDOT MTA at project initiation and over the life of the project.

The MDOT MTA ensures that LOTS sub-recipients establish and maintain compliance with Title VI requirements through the following activities:

- All subrecipients are required to sign an assurance document compliant with 49 CFR Section 21.7(a) and submit it to MDOT MTA with their annual funding application. MDOT MTA staff reviews this documentation for completeness and accuracy.
- Any subrecipient applying for or receiving funding for the first time is required to submit to the MDOT MTA information regarding their Title VI compliance history if they have previously received funding from another federal agency. This includes a copy of any Title VI compliance review activities conducted in the last three years. The summary should include a) the purpose or reason for the review; b) the name of the agency or organization that performed the review; c) a summary of the findings and recommendations of the review; and d) a report on the status and/or disposition of such findings and recommendations. This information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part. This submittal is made to the MDOT MTA prior to any funding being awarded. MDOT MTA staff review this documentation for completeness and accuracy. Any concerns identified as part of this review are investigated fully prior to the awarding of FTA funds.
- Each subrecipient is required to notify MDOT MTA in writing about any complaints, lawsuits, or FTA administrative activity within three business days of their knowledge of these actions. If MDOT MTA receives such a notification, MDOT MTA immediately notifies the FTA. OLTS staff is assigned to assist in investigation of the issue. If necessary, OLTS staff may provide technical assistance to the subrecipient to assist in the development of corrective actions and monitor the implementation of those corrective actions.
- Each subrecipient is required to maintain a Title VI complaint log. The “Title VI Investigations, Complaints & Lawsuit Log” is used to provide updated summary information to OLTS staff on any Title VI complaints received over the preceding quarter. This quarterly log is reviewed by OLTS staff along with a Request for Payment form. These quarterly reports also include financial and program measures updates.
- At a minimum, each subrecipient shall conduct outreach to inform the public of the subrecipient’s Title VI obligations, apprise members of the public of the protections against discrimination afforded to them by Title VI, notify the public that the subrecipient certifies that they are in compliance with these requirements, and explain how the public can access the subrecipient’s complaint process. Documentation of this effort shall be submitted to MDOT MTA once per year, through the annual transportation plan (ATP) process. The subrecipients make their application available for public review and comment prior to the submission of the application to MDOT MTA. MDOT MTA staff review this documentation for completeness and accuracy.
- Subrecipients for Sections 5307, 5311, and 5339 funding are required to have a Transportation Development Plan (TDP). These plans are updated on a five-year cycle. As part of the TDP update, a critical assessment of the subrecipient’s Title VI obligations and their ability to meet these requirements is conducted. This planning

effort also serves as a tool to develop current and accurate data to identify minority, LEP, and low-income populations. OLTS staff provides technical assistance and guidance directly to subrecipient staff as the planning update process is conducted.

- MDOT MTA provides subrecipients with a program manual as part of a training effort. Additionally, MDOT MTA hosts routine mandatory training sessions throughout the year to present various FTA program requirements, including the requirements associated with Title VI.
- Quarterly or as needed, OLTS staff conduct site visits at subrecipients' facilities as part of its continuing and ongoing technical assistance and monitoring program. During these visits, staff look for visual indications of Title VI compliance. Additionally, as MDOT MTA staff interacts with subrecipient's staff, they monitor for indications that subrecipients understand and are adhering to Title VI requirements.
- Each subrecipient will be scheduled to receive a comprehensive site visit and compliance review by MDOT MTA staff, on a risk assessment basis.[1] These reviews are conducted to assure all relevant FTA program regulations are being followed and implemented by our subrecipients. Title VI compliance is part of this review process. While on site, staff physically review any written policy documents and records subrecipients have on file relevant to Title VI, including LEP programs and complaint policies and procedures. Subrecipients are charged with correcting any deficiencies identified during these reviews. MDOT MTA staff work directly with subrecipients to provide technical assistance and ensure the corrective actions are implemented in a timely manner.

Table 5 provides information on the most recently completed compliance reviews of subrecipients. LOTS compliance reviews include evaluation of Title VI requirements and are conducted every three years, per FTA regulations.

[1] The "risk assessment basis" refers to the formula used to determine the date of the next review. Elements of the formula include quarterly meeting notes; ability to spend annual awards in a timely fashion; drug and alcohol performance; the result of a previous triennial review; and input from regional planners. The result of this evaluation determines whether a LOTS should receive a review in three, four, or five years

Table 5: LOTS Recently Completed Compliance Reviews

Locally Operated Transit Systems (LOTS)	Most Recent Compliance Review	Upcoming Compliance Review
Allegany County Transit	June 5, 2019	Spring 2026
Annapolis Transit	December 13, 2018	Summer 2026
Anne Arundel County Transit	July 19, 2023	Summer 2026
Baltimore City DOT/Charm City Circulator	September 14, 2020	Spring 2026
Baltimore County/CountyRide and Towson Loop	May 25, 2023	Spring 2026
Calvert County Public Transportation	November 13, 2018	Summer 2026
Carroll County Trailblazer	February 15, 2023	Winter 2027
Cecil County Transit	July 31, 2019	Spring 2026
Charles County VanGo	August 16, 2022	Summer 2026
Delmarva Community Transit (DCT) -Dorchester County	December 13, 2022	Winter 2026/2027
Delmarva Community Services (DCS) -Caroline, Kent & Talbot Counties	December 13, 2022	Winter 2026/2027
Frederick County Transit	March 13, 2023	Spring 2026
Garrett Transit Services	June 22, 2023	Summer 2027
Harford County Transportation Service	September 13, 2018	Spring 2026
Howard Transit/Regional Transportation Agency of Central Maryland (RTA)	November 2, 2020	Winter 2026/2027
Montgomery County - RIDE ON	March 21, 2019	Fall 2026
Ocean City Transit	September 27, 2022	Winter 2026/2027
Prince George's County - THE BUS (TransDev)	October 25, 2022	Fall 2026
Queen Anne's County Ride	October 25, 2019	Fall 2026
Shore Transit – Tri-County Council of Lower Eastern Shore	July 26, 2022	Summer 2026
St. Mary's Transportation Service (STS)	December 6, 2019	Winter 2026/2027
Washington County Transit	November 22, 2019	Summer 2026

Source: MDOT MTA – Office of Local Transit Support

Title VI Program Submission Schedule

On a triennial basis, each subrecipient is required to submit a complete Title VI Plan appropriate to their system size meeting all federal requirements. OLTS provides each subrecipient with notice of their plan requirements and due dates. Each submitted plan is reviewed by the OLTS and EOCP for completeness and accuracy. Both offices work with subrecipients to develop an approved plan.

MDOT MTA is initiating the next Title VI Programs for the 2027-2029 period for all 5310 and LOTS subrecipients while finalizing current plan review and approval by the end of 2026.

Table 6 is a list of Section 5310 subrecipients and the dates their previous Title VI Programs were submitted, as well as the due dates for their upcoming Title VI Programs. **Table 7** lists this information for LOTS Title VI programs.

Table 6: Section 5310 Title VI Program Submittal Status as of December 31, 2025

LOTS	Most Recent Title VI Program Date	Next Title VI Program Due Date
Action in Maturity	October 28, 2020	December 31, 2026
Alleghany HRDC	November 3, 2023	December 31, 2026
Appalachian Parent Association	August 10, 2020	December 31, 2026
Associated Catholic Charities	December 2, 2020	December 31, 2026
Athelas	November 1, 2021	December 31, 2026
Bayside Community Network	June 20, 2020	December 31, 2026
Chesterwye Center	in process	December 31, 2026
Comprehensive Housing Assistance, Inc.	January 1, 2021	December 31, 2026
Daybreak Adult Day Services	September 16, 2020	December 31, 2026
Delmarva Community Services (DCS)	November 3, 2023	December 31, 2026
Dove Pointe. Inc.	November 1, 2020	December 31, 2026
Easter Seals Baltimore	June 6, 2024	December 31, 2026
Harford Center	Reviewed by OLTS July 2020	December 31, 2026
Hopkins Elderplus	November 20, 2020	December 31, 2026
LifeBridge Health	March 12, 2018	December 31, 2026
Lifestyles of MD	June, 2020	December 31, 2026
Partners In Care (PIC)	October 15, 2020	December 31, 2026
Progress Unlimited Inc.	December 31, 2020	December 31, 2026
Providence Center	December 6, 2017	December 31, 2026
Richcroft, Inc.	In process	December 31, 2026
Sheppard Pratt	December 1, 2020	December 31, 2026
Spring Dell	August 14, 2020	December 31, 2026
St. Mary's Adult Medical Day Care, Inc.	March 23, 2018	December 31, 2026
St. Mary's Nursing Center	December 22, 2020	December 31, 2026
The Arc of Carroll County	August 3, 2020	December 31, 2026
The ARC of Central Chesapeake	November 12, 2021	December 31, 2026
The ARC of Northern Chesapeake	October 17, 2017	December 31, 2026
The Arc of Southern Maryland	August 7, 2018	December 31, 2026
The League for People with Disabilities	December 1, 2020	December 31, 2026
Unified Community Connections	October 1, 2020	December 31, 2026
Washington County CAC	December 6, 2017	December 31, 2026
Worcester County Comm on Aging	November 17, 2023	December 31, 2026
Worcester County Developmental Center	December 6, 2017	December 31, 2026

LOTS	Most Recent Title VI Program Date	Next Title VI Program Due Date
Friends Aware	October 9, 2017	December 31, 2026
Somerset Community Services	December 5, 2017	December 31, 2026
Lower Shore Enterprises	May 12, 2017	December 31, 2026
Dorchester County Commission on Aging/Pleasant Day	July 1, 2014	December 31, 2026
Meritus Health	New Grantee – in progress	December 31, 2026
Nuwave	New Grantee – in progress	December 31, 2026

Source: MDOT MTA – Office of Local Transit Support

Note: Some subrecipients closed out awards following adoption date and were not funded again until FY 26/27. Updates are in progress.

Table 7: LOTS Title VI Program Submittal Status as of December 31, 2025

LOTS	Date Title VI Program Submitted	Date MTA Review Sent	Date LOTS Signed	Next Title VI Program Due Date
Allegany County Transit	June 30, 2023	September 5, 2023	June 30, 2023	December 31, 2026
Annapolis Transit	August 1, 2023	September 23, 2023	October 30, 2023	December 31, 2026
Anne Arundel County Transit	August 14, 2023	September 26, 2023	Final signature pending requested edits.	December 31, 2026
Baltimore City DOT/Charm City Circulator	August 14, 2023	September 30, 2023	Final signature pending requested edits.	December 31, 2026
Baltimore County/CountyRide and Towson Loop	August 1, 2023	September 23, 2023	July 31, 2024	December 31, 2026
Calvert County Public Transportation	July 3, 2023	November 17, 2025	January 29, 2026	December 31, 2026
Carroll County Trailblazer	July 14, 2023	September 30, 2023	July 10, 2023	December 31, 2026
Cecil County Transit	July 31, 2023	September 24, 2023	Final signature pending requested edits.	December 31, 2026
Charles County VanGo	June 30, 2023	August 19, 2025	Final signature pending requested edits.	December 31, 2026
Delmarva Community Transit (DCT) -Dorchester County	August 22, 2023	September 23, 2023	November 3, 2023	December 31, 2026
Delmarva Community Services (DCS) -Caroline, Kent & Talbot Counties	August 22, 2023	September 23, 2023	November 3, 2023	December 31, 2026
Frederick County Transit	July 31, 2023	September 30, 2023	February 1, 2024	December 31, 2026
Garrett Transit Services	July 19, 2023	September 30, 2023	July 12, 2023	December 31, 2026
Harford County Transportation Service	July 7, 2025	November 17, 2025	Final signature pending requested edits.	December 31, 2026

Howard Transit/Regional Transportation Agency of Central Maryland (RTA)	August 3, 2023	September 30, 2023	August 3, 2023	December 31, 2026
Montgomery County - RIDE ON	October 16, 2023	January 16, 2024	March 8, 2024	December 31, 2026
Ocean City Transit	September 18, 2023	September 23, 2023	October 27, 2023	December 31, 2026
Prince George's County - THE BUS (TransDev)	Resubmitted July 10, 2025	August 20, 2025	February 23, 2024	December 31, 2026
Queen Anne's County Ride	August 15, 2023	September 26, 2023	May 31, 2023	December 31, 2026
Shore Transit – Tri-County Council of Lower Eastern Shore	July 31, 2023	September 5, 2023	October 18, 2023	December 31, 2026
St. Mary's Transportation Service (STS)	July 26, 2023	September 28, 2023	Final signature pending requested edits.	December 31, 2026
Washington County Transit	July 28, 2023	October 1, 2023	October 25, 2023	December 31, 2026

Source: MDOT MTA – Office of Local Transit Support

State Management Plans and Program-Specific Title VI Oversight

Section 5310 – Enhanced Mobility of Seniors and Individuals with Disabilities

MTA administers the Section 5310 program in accordance with Title VI of the Civil Rights Act of 1964, ensuring that the selection and oversight of subrecipients is conducted on a broad and equitable basis that prohibits discrimination on the grounds of race, color, or national origin. The fund selection process, overseen by the State Coordinating Committee for Human Services Transportation (SCCHST), actively encourages participation by minority organizations and those serving minority communities, and all subrecipient awards are contingent upon execution of annual federal certifications and assurances affirming compliance with non-discrimination requirements. MTA's Equal Opportunity Compliance Program (EOCP) reviews subrecipient Title VI, DBE, and EEO programs, and MTA conducts ongoing oversight through quarterly reporting, periodic on-site visits, and full compliance reviews conducted every three to five years. All Section 5310 subrecipients are required to maintain a written non-discrimination policy, designate a Title VI contact, establish a process for receiving and resolving Title VI complaints, develop a Limited English Proficiency (LEP) Plan and a public participation plan, and submit a comprehensive Title VI Policy and Program to MTA's Office of Fair Practices at least every three years. The full Section 5310 State Management Plan is included as **Appendix H: State Management Plans**.

Section 5311 – Formula Grants for Rural Areas

MTA administers the Section 5311 program to ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any Section 5311-funded project or activity on the grounds of race, color, national origin, sex, age, or disability. To support equitable distribution of funds, each subrecipient is required to develop and maintain a demographic profile of its jurisdiction identifying the locations of low-income and minority populations, which MTA/OLTS incorporates into the statewide transportation planning process through Transportation Development Plans (TDPs), Coordinated Transportation Plans, and the Consolidated Transportation Plan (CTP). Funding recommendations for both operating and capital assistance are evaluated in light of this ongoing demographic monitoring, and a subrecipient's failure to make appropriate service adjustments in response to identified disparities may be factored into future funding decisions. MTA/OLTS coordinates with the EOCP for implementation and oversight of Title VI requirements, and conducts subrecipient compliance reviews on a triennial basis. All Section 5311 subrecipients must maintain a written non-discrimination policy, designate a Title VI contact, develop LEP and public participation plans, and report any Title VI complaints or investigations to MTA promptly. The full Section 5311 State Management Plan is included as **Appendix H: State Management Plans**.

Section 5339 – Buses and Bus Facilities

MTA administers the Section 5339 program in a manner that ensures equitable distribution of capital funds to subrecipients serving minority and low-income populations throughout Maryland. Each subrecipient is required to develop and maintain a demographic profile of its service area identifying the locations of low-income and minority populations, which MTA/OLTS incorporates into the statewide transportation planning process through Transportation Development Plans (TDPs), Coordinated Transportation Plans, and the Consolidated Transportation Plan (CTP). Capital funding recommendations, including prioritizing vehicle replacement, ADA compliance needs, and other transit capital projects, are informed by this ongoing demographic monitoring, and a subrecipient's failure to make appropriate service adjustments in response to identified disparities may be considered in future funding decisions. All Section 5339 subrecipients must maintain a written non-discrimination policy, designate a Title VI contact, establish a complaint resolution process, develop LEP and public participation plans, and submit a Title VI Policy and Program to MTA's Office of Fair Practices every three years; fixed-route operators are additionally required to establish quantitative service standards and policies consistent with FTA Circular 4702.1B. The full Section 5339 State Management Plan is included as **Appendix H: State Management Plans**.

Public Participation Plan

Introduction

This Public Participation Plan (PPP) is designed to guide the decision-making process for all transit planning activities that require public outreach. The PPP is also designed to meet the Federal Transit Administration's (FTA) Title VI regulations to provide "early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions."

The PPP presents guiding principles for MDOT MTA to consider when planning public participation and summarizes laws and regulations that may govern public participation . To supplement these principles and requirements, goals offer aspiration points for the agency when carrying out public participation efforts. Embodied in these principles and goals are MTA's stated core values of safety, equity, respect, customer focus and continuous improvement. Finally, public participation methods include specific action items MDOT MTA can undertake when executing public outreach that can be helpful when engaging minority, low-income, and LEP populations as required under Title VI, as well as other vulnerable populations including seniors, people with disabilities, and transit-reliant individuals.

Public Participation Guiding Principles

Effective public participation should be based on the overarching guiding principles listed and described in **Table 8**.

Public Participation Goals

The PPP is intended to facilitate public involvement, especially from:

- Populations potentially affected by proposed transit decisions.
- Low-income, minority, senior, disabled, and limited English proficient (LEP) populations.

Building off the guiding principles, **Table 9** lists and summarizes eight goals – and corresponding outcomes sought through each goal – associated with this PPP.

Table 8: Public Participation Plan Guiding Principles

Guiding Principle	Description
Accessible	MDOT MTA provides opportunities for public participation that provide equal access to all members of the public who wish to participate.
Accountable	MDOT MTA continuously evaluates the success of its public participation efforts and ensures that best practices for effective outreach are consistently followed whenever possible.
Authentic and Meaningful	MDOT MTA supports public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.
Clear and Focused	Public participation methods have a clear purpose and use for input and are described in language that is easy to understand.
Conscientious	MDOT MTA recognizes the importance of public engagement and participation to the agency as a whole and articulates public participation goals and principles to all employees. MDOT MTA sets high standards for public engagement activities and strives to meet them at all levels of the organization.
Flexible	The engagement process allows for participation in a variety of ways and may be adjusted as needed.
Inclusive	MDOT MTA reaches out to low income, minority, and limited English proficient populations from within its service areas to provide these groups with the opportunity to participate.
Respectful	All feedback received is given careful, thoughtful and courteous consideration.
Responsive	MDOT MTA strives to incorporate appropriate public comments into transportation decisions.
Tailored	MDOT MTA public participation methods are tailored to match local and cultural preferences as much as possible.
Timely	Participation methods allow for early involvement and are ongoing and proactive, allowing participants to have the opportunity to influence MDOT MTA's decisions.
Transparent	MDOT MTA strives to openly communicate the results of the public's input in terms of the impact on decisions by providing the major themes, the decisions reached, and rationale for the decisions.
Trustworthy	The information provided is accurate, reliable and honest.

Table 9: Public Participation Plan Goals

Goal	Desired Outcome
Accessibility	Every effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
Clarity in Potential for Influence	Any outreach process clearly identifies and communicates when, where, and how participants can influence and directly impact decision-making.
Consistent Commitment	MDOT MTA staff communicates with communities in its service areas to develop trust and to allow opportunities for public input.
Customer Service	MDOT MTA provides world class customer service to riders with a positive attitude, anticipating and addressing customer needs.
Diversity	During public participation efforts, MDOT MTA aims to include a range of socioeconomic, ethnic, and cultural perspectives, including, when possible, residents with limited English proficiency.
Participant Satisfaction	People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
Quality Input and Participation	Comments received by MDOT MTA are useful, relevant, and constructive, contributing to better plans, projects, policies, strategies, and decisions.
Relevance	Issues are framed in such a way that the significance and potential effects are understood by participants.

Public Participation Outreach Strategies

Public participation outreach strategies provide guidance for tailoring outreach to initiatives and projects. For example, some projects may affect some communities or geographic areas but not others. For this reason, strategies should be geographically focused. The steps listed below are designed to guide MDOT MTA through the process of developing a comprehensive public participation strategy.

Step One: Identify Project for Public Participation

To begin, MDOT MTA identifies a project or initiative that will warrant or require a public participation effort. Projects may include a proposed service change, fare changes, alterations or cancellations of routes or stations, an ongoing or comprehensive planning initiative, or a general effort to obtain feedback on service from riders or prospective riders.

Step Two: Identify Target Populations and Public Participation Needs

MDOT MTA staff analyzes demographic characteristics of affected populations. This analysis may include the use of Census data to determine the percentage minority, limited English proficient, and low-income population within a study area. This may also involve coordination with state or local agencies.

In addition, in the spirit of early and continuous involvement, depending on project size, MDOT MTA staff may notify relevant advisory committees (the CAC, CACAT, and MARC RAC) of an initiative or new project through an initial presentation or transfer of information. MDOT MTA may also communicate with committees and leaders – through formal presentations or transfer of information – throughout the planning process, as well as once plans are finalized.

Step Three: Develop the Public Participation Strategy

As warranted, MDOT MTA brings together representatives from relevant departments, including the Office of Customer and Community Relations, the Office of Service Development, the Office of Governmental Affairs, the Office of Communications and Marketing, the Office of Equal Opportunity Programs and the Office of Planning, to gather input for development of a public participation strategy for each initiative or project. Each initiative's or project's public participation strategy may include topics such as how outreach efforts will be publicized, types of public participation opportunities that will be held (such as public meetings, pop-ups, or presentations for community or school groups) and the dates and times these will be held. The strategy may provide opportunities for written comments (mail, digital) and comments by phone; identify community-based organizations (CBOs) in the project area and how their participation will be solicited in the public participation process; and/or identify translation and interpretation needs to support outreach efforts.

Outreach efforts selected will include the inclusive participation methods described in the Public Participation Methods section of this document. Methods may include print or digital materials, use of media (including social media), stakeholder outreach, public meetings, or some combination. In response to the COVID-19 pandemic and the resulting inability to meet in person, methods now also include virtual engagement options as well as modified outdoor activities designed so MDOT MTA could connect with the community in safe ways. Outreach opportunities are varied in type and scheduled at different times in the day and days of the week, to accommodate all potential interested participants.

Certain and specific timing, advertising, reports, comment periods, means of public hearings, outreach, and distribution of reports, analysis and implementation may be required by State law depending on the transit action under consideration or development.

Step Four: Coordinate with Community-Based Organization Partners

At the outset of the public participation process, MDOT MTA staff may engage with CBOs and leaders that represent or serve low-income, minority, senior, disabled, transit-reliant, or LEP populations within the areas affected by the project, policy, program, or service. Depending on the type and size of a proposed action or project, this engagement may include provision of information on the planned service change or project and upcoming public participation opportunities. MDOT MTA staff should also explore the interest of individual CBOs in greater engagement in the public participation process. For example, some CBOs may be willing to help their constituents' complete surveys or provide verbal or written comments to MDOT MTA, be interested in providing their own feedback to MDOT MTA, or may wish to have MDOT MTA present at their meetings.

Step Five: Develop Materials and Advertise

Prior to beginning outreach, MDOT MTA ensures all printed materials and advertising (print, digital, radio, etc.) clearly describes the action or project under consideration and purpose of meetings or public participation activities. In areas with significant LEP populations, project materials may be translated into languages other than English upon request. Activities are then publicized, as necessary. MDOT MTA advertises for all proposed actions and projects that language interpretation services for public participation activities are available when requested.

Step Six: Implement Public Participation Strategies

The implementation stage of the public participation process focuses on delivering the engagement methods identified in Step 3. At in-person events such as community meetings or workshops, staff may offer participants the option to complete a Title VI feedback form that captures information on race, household income status, and English language proficiency, as well as their satisfaction with the available outreach opportunities, to enable continuous improvement of MDOT MTA’s public participation opportunities. While questions on demographics and Title VI-related items are standardized on this form, initial portions of forms may be tailored to obtain relevant feedback on individual projects. If applicable, this form may be translated into languages prevalent within a given study area. The Title VI portion of this form has been included as Appendix F. MDOT MTA staff has noted that not every interaction allows for sufficient time to capture demographic information from participants, particularly during pop-up events when riders may be in a rush to board their transit vehicle. Staff may consider using technology to assist in this effort by offering participants access to a short survey via QR code that they can access later or use virtual platform polling tools during on-line events to learn more about their audiences and obtain feedback.

Step Seven: Compile, Review, and Report Results of Public Feedback

MDOT MTA constantly reviews the effectiveness of its public participation efforts to determine where they can improve - meeting to meeting, phase to phase. One of the main methods staff have begun to evaluate their efforts is to map the locations of those with whom they have engaged (including pop-ups, public meetings, etc.) to determine if gaps in engagement emerge. In select cases, the results of how public input was utilized in the planning process may be

reported back to the public, typically in a final report, website posting, or in a separate brochure. This information may be posted on the MDOT MTA website and sent in emails to CBOs and/or additional entities.

Typically, the project team assesses how outreach efforts could have been improved, as well as lessons learned for future endeavors. One mechanism MDOT MTA has used to gauge satisfaction with outreach locations, times, dates, and methods of public participation is submitted feedback forms. When demographic information on participants is collected, MDOT MTA also evaluates the approximate percentage minority, LEP, and low-income constituency reached as a result of the outreach effort. MDOT MTA may also evaluate the success of an outreach endeavor based on conversations with participants at or following events.

Public Participation Methods

MDOT MTA strives to proactively promote public involvement and to keep riders, community members, stakeholders and elected officials informed about agency initiatives, issues, and programs. The agency's public participation guiding principles, goals, and strategies inform the selection of public participation methods and help ensure that engagement activities are accessible, inclusive, and responsive to community needs.

Over the past several years, MDOT MTA expanded and refined its engagement strategies by incorporating a broader range of tools and formats. These include traditional in-person outreach, digital communication platforms, and hybrid engagement approaches that allow participants to engage both in person and remotely. These methods provide the agency with greater flexibility to reach riders and communities in ways that best meet their needs and preferences.

MDOT MTA has found that using a variety of engagement strategies strengthens its ability to connect with diverse audiences. Virtual meetings and digital engagement tools can increase convenience and participation for some riders and stakeholders, while in-person outreach remains essential for building relationships, reaching communities with limited digital access, and engaging riders directly in the transit system environment. By maintaining multiple engagement options, the agency can broaden participation and ensure that public input reflects the perspectives of a wide range of riders and communities.

Public participation methods - including a description of how each method may best be employed - are discussed in more detail in the following section. As with many transit agencies, providing information to the public is a multifaceted process that may involve sharing updates on proposed or approved service changes, gathering feedback on plans or initiatives, or informing riders about temporary or long-term service adjustments.

Public participation methods are organized as follows:

- Print materials
- Digital materials
- Media
- Station information
- Stakeholder communication
- Direct rider outreach and feedback
- Public meetings.

Print Materials

General Printed Notices

MDOT MTA uses print materials such as rider notices, car cards, flyers, posters, signs, and banners to notify riders of public outreach efforts or service changes. Along with e-notifications, printed materials have proven to be an effective method of communication for some communities. For example, during the pandemic, MTA's Mobility Services worked with its contractors to provide printed informational material via "seat drops" to riders.

Public outreach materials may be translated into various languages, depending upon the language demographics of any affected populations. As a rule, selected materials used for public outreach, presented in **Table 10** as well as in the **Language Assistance Plan**, contain a tagline providing notice to LEP people about the availability of language assistance. MDOT MTA has translated this tagline into Spanish.

Table 10: MDOT MTA Public Outreach Materials for Tagline Inclusion

Public Outreach Material	Description
Print Advertisements	Published announcements notifying the public regarding MDOT MTA programs, activities, and services.
Printed Brochures	The MDOT MTA Snow Guide, Mobility Riders Guide, Transit App Brochure, CharmPass App Brochure, SmartBenefits Brochure, Safety Tips Brochure, Bike Brochure, and Visitors Guide Brochure.
Temporary Service Interruption Signage	Printed notices posted alerting riders to interruptions to MDOT MTA service availability and interruptions to the accessibility of MDOT MTA-owned stations.
Service Schedules	MDOT MTA's published documents containing timetables of revenue service and route maps.

Postcards and Letters Distributed by Mail

Participation methods are occasionally publicized by letters or postcards distributed by mail. This can be an effective method for reaching a specific geographic area or population group, especially a population less likely to use digital communication methods. That said, MTA staff involved in public engagement note that the success of this method is highly dependent upon the quality of the mailing addresses they are able to obtain. Oftentimes, a significant number of postcards are returned to the agency due to inaccurate mailing addresses. As this can be an expensive strategy, the agency will likely prefer to rely on other methods, such as door-to-door canvassing, to communicate with the community, especially for focused project areas.

Digital Materials

MDOT MTA Website

MDOT MTA's website, mta.maryland.gov, is a communication tool providing substantial information on agency policies, strategies, plans, and methods. MDOT MTA's website, as well as project-specific websites, also offer users an option to translate many of its web pages into many languages via Google Translate. The MDOT MTA website links users to the agency's social media platforms on Facebook, Twitter, Instagram, YouTube, and LinkedIn.

Social Media

MDOT MTA uses Facebook, Twitter, Instagram, YouTube, LinkedIn, and SoundCloud to disseminate information to riders and inform them about upcoming opportunities for public input. The agency also receives public input by monitoring replies and comments across these sites.

Mobile Apps

MDOT MTA uses mobile applications, including the Transit App real time arrival app and the CharmPass mobile ticketing app, to disseminate information about service availability and service disruptions. Service issues commonly addressed on these platforms include disruptions due to traffic congestion, maintenance, or weather.

Media

Radio Station

MDOT MTA operates its own radio station, WTTZ 93.5 FM. The station broadcasts regular transit reports, traffic information, and updates on flight delays at BWI Airport. Radio broadcasts are played over the public address system at Light Rail and Metro Subway stations. Broadcasts are also available online via the TuneIn service.

In addition, MDOT MTA operates a SoundCloud channel to post audio broadcasts related to transit access for special events and major attractions throughout Maryland.

Local News

Participation opportunities are sometimes publicized through newspapers publications serving English or Spanish speaking audiences. Ethnic media is a particularly useful tool for reaching LEP and minority communities that MDOT MTA endeavors to utilize. MDOT MTA includes taglines advertising translation service available in Spanish for all printed advertisements. Taglines or other public participation materials may be translated into additional languages, upon MDOT MTA's determination that such would be beneficial and feasible.

Station Information

Station Information Resources

In transit stations and on its vehicles, MDOT MTA uses LED signs, static signs, and voice to provide important information to riders.

Stakeholder Communication

Communication with Elected Officials

MDOT MTA's Office of Governmental Affairs (OGA) provides updates on the agency's plans and projects to federal, state, and local elected officials. OGA may send letters or emails summarizing agency decisions in advance of public notification. This ensures that elected officials are aware of transit issues and be prepared to respond to questions or comments from constituents.

Non-Elected Advisory Committees

MDOT MTA is committed to providing the highest possible level of safe, reliable, affordable, convenient, and accessible service to all its customers. The agency's Citizens Advisory Committee (CAC), Citizens Advisory Committee for Accessible Transportation (CACAT), and MARC Rider Advisory Committee (RAC) were established to achieve several aims:

- Establish and maintain consistent and responsive communications between MDOT MTA and its customers.
- Improve the quality of service from the customers' point of view.
- Provide direct input regarding customer perception of service.
- Facilitate inclusion of customer observations into service monitoring and modification.

Members of the advisory committees are appointed by the MDOT MTA Administrator and meet on a monthly basis. The CAC and the CACAT periodically recruit volunteers to participate on the committees. Staff facilitators advertise volunteer opportunities through English and Spanish signage at transit centers and stations, the MDOT MTA website, and other outreach channels. Recruitment efforts seek to encourage participation from a diverse range of riders, including minority and Limited English Proficient (LEP) populations.

Committee meetings are open to the public. Meetings may be held in person, virtually, or in a hybrid format to maximize accessibility and participation. Virtual participation options allow attendees to join using an online platform or by phone, providing flexibility for committee members and members of the public who wish to participate. Meeting links or location details are posted on the MDOT MTA website.

Meetings typically include updates on MDOT MTA services, programs, and performance, and may include discussions of proposed service changes, policy initiatives, or upcoming agency activities. Committee members and members of the public are provided opportunities to share comments and feedback during each meeting. Agendas and meeting minutes are published on the MTA website.

The project team developing this MTA 2026-2029 Title VI Program, attended CAC and CACAT meetings in February 2026 to share updates to its Title VI Program and receive feedback from the committee members.

Civic and Community Organizations

Upon invitation, MDOT MTA provides updates on its policies, projects, programs, strategies, and methods during scheduled meetings of local civic and community organizations. These gatherings allow the agency to meet community members and leaders in their respective communities, often achieving a higher engagement rate than that of a traditional public meeting. Meetings generally include a presentation as well as a question-and-answer session. As

a result of its experience during the pandemic, MTA staff has learned to be flexible in joining virtual sessions held by community organizations to provide updates on projects and services if an in-person meeting is modified to a virtual meeting platform.

Coordination with Community Events

With entities such as the Baltimore Office of Promotion and the Arts and the State of Maryland, MDOT MTA hosts information booths at various community events. These 'tabling' events offer MTA the opportunity to provide materials regarding MDOT MTA service, programs, activities, upcoming or ongoing projects, or upcoming or ongoing outreach efforts.

Community Outreach Campaigns

MDOT MTA has several community outreach initiatives designed to improve the quality of life of its customers and the communities it serves. Outreach initiatives are often seasonal, and some examples include:

- Comfort Bus/Holiday Bus. Occasionally deployed buses parked at outreach or community events. These buses include printed material regarding service information, water, and heat or air conditioning. The Holiday Bus operates on all local bus routes for three weeks in December. Customers are treated to a free fare and holiday music.
- See Something, Say Something. This campaign urges riders to report suspicious activities on transit to authorities.

Direct Rider Outreach and Feedback

Office of Customer and Community Relations (OCCR)

The MDOT MTA Office of Customer and Community Relations manages the Transit Information Contact Center (TICC), whose agents assess comments and complaints regarding service. Feedback may include Title VI complaints, which must be forwarded to the agency's Equal Opportunity and Compliance Programs office for processing and monitoring. MDOT MTA welcomes suggestions, questions, compliments, or complaints at any time. Interested parties may call the TICC Comment Line at 410-539-5000; 1-866-743-3682 (Toll Free); or Maryland Relay Service at 7-1-1.

Other mechanisms to submit feedback include:

- MDOT MTA website (www.mta.maryland.gov)
- MDOT MTA social media channels (Facebook, Twitter, Instagram, YouTube, and LinkedIn)
- Rate Your Ride, MDOT MTA's online survey system to submit feedback (http://rateyourride.org)

Rider Surveys

Rider surveys, including origin-destination studies or investigations of customer satisfaction, are an essential tool for soliciting public input on transit service. Surveys, which are often provided online or in hard copy, depending on the topic, can play an important role in service adjustments. Upon request, as resources generally permit, MDOT MTA

translates surveys into requested languages. Customer satisfaction surveys are generally completed annually, while origin-destination surveys must be completed at least once every five years.

Door-to-door Canvassing

Door-to-door canvassing brings MDOT MTA staff directly to residents and businesses that may be affected by proposed transit projects or infrastructure changes, such as dedicated bus lanes, bus stop relocations, or streetscape improvements. This outreach method allows staff to provide information related to the action under consideration and gather feedback through direct, one-on-one conversations with community members.

Team members wear identifiable safety vests and display MDOT MTA identification while conducting canvassing. If no one is available, informational materials may be left with instructions on how to learn more about the project or provide comments.

To support inclusive engagement, outreach materials may be available in multiple languages, and bilingual staff may participate in canvassing activities when possible.

Senior Center Visits

MDOT MTA's Mobility team has begun visiting senior centers in its service area to provide information on Mobility's services and obtain feedback from customers.

Public Meetings

Public meetings allow MDOT MTA staff to engage with interested members of the community on transit projects and upcoming decisions. These meetings may be informational or intended to solicit feedback, or both. When planning public meetings, regardless of the format – including virtual formats, MDOT MTA takes several items into account:

- Scheduling. Public meetings should allow sufficient time between the last meeting and the next phase of the project to allow time for feedback to be analyzed and incorporated.
- Meeting Locations/Formats. For in-person formats, MDOT MTA staff considers the convenience and comfort level of meeting locations when reserving space. Typical in-person venues include public libraries, local schools, colleges, and state or city-owned buildings. MDOT MTA is required to conduct all in-person public participation activities in locations fully accessible to people with disabilities and preferably, the venues should be served by public transit. For virtual formats, online accessibility for people who are deaf and hard of hearing, or visually impaired should be a consideration, as should language interpretation as needed.
- Internet/Phone Access. When hosting on-line meetings consideration should be given to internet/wifi availability and bandwidth on the participant's end, and call-in numbers provided to ensure access if a participant cannot access the internet.
- Meeting Times. Public meetings are scheduled at varying times of day and preferably on different days of the week. For example, meetings may be held on weeknights after traditional work hours, or during traditional lunch hours, depending on the meeting location/format and context. To allow for participation from working parents or others who cannot attend weekday events, MDOT MTA also considers weekend events to allow for maximum participation.
- Number of Meetings. Some transportation decisions require more meetings than others. For example, MDOT MTA held more than twenty meetings for a system-wide decision affecting community members throughout the entire State of Maryland.

MDOT MTA uses several different types of public meetings to convey information and solicit feedback, the most common types of which are described below; some meeting elements cross over between types. Meetings may be held in person, virtually, or in a hybrid format depending on the needs of the project and community.

Regardless of format, these meetings emphasize interactive engagement, such as polling, small group discussions, or opportunities for participants to provide comments directly on maps or materials. MDOT MTA views these meetings as two-way opportunities for information exchange between the agency and the public.

Informational Open Houses

Informational open houses provide opportunities for participants to receive information about an agency activity at their own pace. These forums may (but do not always) begin with a brief educational presentation followed by a discussion period for comments and questions and answers. Participants are often asked to visit several stations providing any combination of display boards, maps, PowerPoint presentations, photographs, visualizations, and other tools. During in-person open houses, participants have the opportunity for one-on-one conversation with MDOT MTA staff. In addition, some open houses include stations that may offer interactive activities as a feedback mechanism. Comments may also be collected through comment forms or through oral conversation and note taking.

Venues for in–person open houses must be fully accessible for people with disabilities. Venue locations are chosen to be as conveniently located as possible for members of affected communities (including access to public transit). While striving to conduct a series of meetings on a single topic, MDOT MTA secures meeting venues with consideration for time of day, length of time required, and expected number of attendees. If the format is virtual, on-line accessibility features are enabled, and translation also may be made available if requested.

Workshops

MDOT MTA holds workshops to develop service change proposals with members of the public. Workshops generally feature a beginning educational presentation to orient participants to the topic. Like open houses, in-person workshops typically include information stations that may include display boards, maps, photographs, or visualizations explaining the discussion topic. Tools to promote participant interaction include feedback forms to utilize during the workshop itself, mapping exercises, and the opportunity for one-on-one conversation with MDOT MTA staff. When in-person meetings are not practical, as was the case during the pandemic, MTA will modify its approach to workshops by hosting some outside. For example, as part of its Inclusive Transportation program (see description of project in “Additional Outreach” section of this Public Participation Plan, staff invited riders with disabilities to come to a bus stop, use the stop and provide feedback on their experience.

Informational Meetings

Informational meetings are generally focused on a specific topic and feature an information presentation followed by a discussion and/or question and answer comment period. Comment periods can be formal or informal, depending on the number of participants and the meeting venue. In cases of large attendance, individual comments may be limited to a certain time. MTA was able to host informational meetings virtually during the pandemic.

Pop-Up Events

Pop-up events are usually focused on a specific topic and held informally at key transit hubs or other activity centers. They are designed for brief interactions (generally ten minutes or less) to inform the public about an ongoing project and/or seek input. Given that the time commitment required from customers tends to be limited and the audience pre-assembled (participants are often awaiting a transit arrival during interactions), pop-ups often achieve a very high response rate. In general, these events are intended to make it easier for people who are unable to attend a long meeting to provide feedback about public transit projects

Public Hearings

Public hearings are formal public meetings whose format and procedures follow state laws and regulations. They are designed to meet the requirement to obtain feedback from the general public on a proposed change MDOT MTA is considering. Maryland law requires MDOT MTA to conduct a public hearing when proposing any of the following changes:

- Fix or revise any fare or rate charged to the general public (other than as required by state law).
- Establish or abandon any bus or rail route listed on a published timetable.
- Change a bus or rail route alignment listed on a published timetable (unless the change is needed because of temporary construction or changes in the road network).
- Reduce the frequency, number of days, or days of service for a commuter bus or commuter rail route without substituting a comparable level of service, unless the reduction is temporary or a result of: a natural disaster; weather or other emergency conditions; schedule adjustments required by a third party that operates service on the same right-of-way; or other circumstances beyond the control of MDOT MTA.
- Establish or abandon a rail transit station.
- For other major service changes

As mandated by State law, MDOT MTA adheres to established procedures for planning public hearings, as depicted in **Table 11**. Notably, the agency must provide a 30-day notice prior to a hearing that must be published in major newspapers and online, posted in certain locations, and on revenue vehicles that will be affected by the proposed service changes. Public hearings also moved to a virtual format when in-person meetings were cancelled. Those who wished to speak on a topic could call in to the hearing. Some actions undertaken by MDOT MTA, such as a reduction or cancellation of certain capital expansion projects, may not require a public hearing under State law but must still comply with statutory public outreach requirements, including consultation, analysis, reports, and postings.

Table 11: MDOT MTA Public Hearing Process Timeline

Timeline Period	Actions
Initial Steps: Greater than 30 Days from Hearing	• Secure venues with ADA accessibility. • Prepare written material to promote public involvement. • Notify elected officials whose constituents may be affected by the proposed service changes.
Begin Outreach: 30 Days Prior to Hearing	• Publish hearing notices for two consecutive weeks in two or more newspapers of daily circulation throughout the affected area. • Publish notices in Spanish language newspaper(s). • Publish notices in local community newspapers and newsletters. • Postcards in English and Spanish on at least seventy percent (70%) of revenue vehicles on modes affected by the proposed changes. • Put up posters in stations and terminals of modes affected by the proposed changes. • Post the proposal of changes at MDOT MTA headquarters in the lobby of 6 St. Paul Street, and on the MDOT MTA website. • Provide a link on social media to the website post describing the public hearing, but do not post any proposed changes on social media. • Disseminate hearing information and proposed changes in brochure format.
Continue Outreach: Within 30 Days of Hearing	• Notify and/or share published material with community leaders and advocates, neighborhood associations, community organizations, colleges and universities, hospitals, and additional groups or organizations that may be affected by the proposed changes. • Update OCCR staff on these meetings so they may provide accurate information to callers. • Arrange for a court reporter, audio system, and language interpreters (when requested). • Secure hearing teams – officers, secretaries, and staff for registration and customer assistance. • Prepare additional printed material for distribution at the public hearings in standard and large print: ○ Copies of the proposed changes (English). ○ Copies of the Hearing Procedures (English and Spanish). ○ Comment forms for written testimony (English and Spanish).

Timeline Period	Actions
Following Hearing: 30-Day Comment Period	• Collect and document comments received at the hearings and via USPS and email. • Once the comment period concludes, provide the MDOT MTA office responsible for proposing the changes and making the final decisions with copies of all written comments and transcriptions of verbal testimony from the hearings. • File all hearing documents: transcripts, sign-in sheets, written testimony, letters received, and documentation of publications. • Consider all comments prior to final decision-making. • Compile and distribute any reports as required by law.

Options to Submit Input on Proposed Service or Fare Changes

Official comment forms are available at public hearing registration tables, MDOT MTA headquarters, and online at www.mta.maryland.gov. Interested people may choose one of the following three methods to submit their comments, which are recorded with the official hearing documentations:

- Verbal testimony at a public hearing. This option was available by phone when hearings moved to a virtual format.
- Submission of written statements at a public hearing using a specific MDOT MTA comment form or in the form of petitions or letters.
- Submission of written statements via email to HearingComments@mdot.maryland.gov using the online comment form at https://customerrelations.mta.maryland.gov/#/feedback or USPS (6 St. Paul St. Baltimore, MD 21202-1614), with or without the specific MDOT MTA comment form.

All comments, verbal and written, are considered when making decisions on changes to transit service or fares.

Stakeholder Meeting takeaways

In addition to the current efforts taken by MTA under step seven of the public participation outreach strategies - to compile outreach efforts, review the effectiveness of its public participation efforts, and report results back to the public - stakeholders attending the two PPP workshops provided recommendations to better track outreach efforts and public participation. In particular, the stakeholders recommended that MTA improve and build tracking functions at both its operations team end and data team end to record, report, and visualize key measures from the outreach effort, so the agency can review the work performed and improve targeted outreach with data-driven methods. These recommendations include:

- Tracking the digital performance of LEP materials
- Increasing translation support on the CharmPass App, and tracking the usage of this translation tool
- Introducing the LanguageLine mobile app for staff use, and tracking the usage of the app
- Utilizing reports in Power BI to track non-English bus announcements (once they're implemented)
- Requiring staff to capture Title VI involvement in in-person events
- Creating a standardized tracking system to measure the reach to LEP, minority, and low-income populations at events. This tracking system could leverage on the one used by the Rider Experience Team,

consisting of an online form that captures qualitative and quantitative data that can then be extracted to dashboards, synthesized, and shared to other departments.

Stakeholders attending the two PPP workshops also provided feedback and recommendations for the first six steps of the public participation outreach strategies, to better identify and address target populations, develop outreach strategies, coordinate with partners, develop material, and implement these strategies. These recommendations, ranging from specific actions to overarching themes, include:

- Updating all strategies with an expanded "LEP" definition matching the new definition adopted in HB-1437, which includes "limited ability to speak, read, write, or understand English"
- Increasing the visibility and availability of resources enabling deaf and hard-of-hearing people to participate, including providing and promoting an ASL interpreter for project public hearings, including captions in all project videos, etc.
- Refreshing the volunteer interpreters' program for 2026
- Expanding the availability of multi-language print materials to staff, including I Speak cards and tear-off sheets
- Posting the State Transportation Equity Bill on the MDOT MTA website
- Adding Bluesky and Threads to MTA's social media channels

Examples of Outreach Efforts: October 2023 – October 2026

This section describes two separate outreach efforts conducted since publication of the previous Title VI Program: one for the BMORE BUS, a long-term transit vision plan launched by MDOT MTA to upgrade and expand the bus network in the Baltimore region, and the other for the MARC Growth and Transformation Plan (MARC G&T). Each example is followed by a summary of the many outreach and engagement activities conducted for the project.

BMORE BUS

In Spring 2024, MTA worked with the community and stakeholders representing a range of interests across the region, including current and potential future riders, to gather feedback throughout the development of the bus network upgrade and expansion study (**Table 12**). The purpose of the first phase of engagement, held in spring 2024, was to introduce BMORE BUS to the public and to better understand the types of bus service improvements that were most important to our riders, to support technical data and inform the recommendations.

The intent of the second phase of engagement, held in fall 2024, was to share the recommended bus service improvements and the two different concepts—or scenarios—for what visionary bus service could look like in the Baltimore region: the Enhanced Frequency Scenario and the Expanded Service Scenario.

MTA employed a variety of strategies to spread the word about the study and collect feedback from the public and stakeholders, including:

- A robust print and digital promotional campaign—with more than 100 flyers posted at bus stops and advertisements on social media and in print and digital news publications in both English and Spanish. These materials reached more than a million people across the region, driving thousands of people to our webpage and helping MTA spread the word about BMORE BUS and its public comment opportunities.

- An online public survey to collect input on the types of bus service improvements that were most important to our riders. The public survey was open between April 23 and June 12, 2024 (51 days/7 weeks). The public survey received more than 700 responses.
- MTA placed print and digital signs and audio announcements on board our buses systemwide to prioritize outreach to existing riders.
- An interactive online map allowed members of the public to explore the full range of possible bus service improvements and scenarios. The tool was presented as a primer prior to asking people to share their feedback.
- MTA created an online feedback form to collect public and stakeholder comments on which of the two scenarios best matched people's needs and vision for what additional bus service could look like in the Baltimore region. The feedback form was open for comment between September 18 and October 18, 2024 and received nearly 200 responses.

Table 12: BMORE Bus Outreach

Date	Event Name	Outreach Type
May 4-5, 2024	Towson Spring Festival	Community Outreach
May 16, 2024	Citizens Advisory Committee for Accessible Transportation	MTA Hosted Meeting
May 17, 2024	Bike to Work Day – Annapolis and Columbia	Community Outreach
May 18, 2024	Youth Transit Council Presentation	MTA Hosted Meeting
May 21, 2024	Citizens Advisory Committee	MTA Hosted Meeting
Sept. 20, 2024	Mayor's Office of Immigrant Affairs	Community Outreach
Sept. 21-22, 2024	32nd Street Farmers Market	Community Outreach
Sept. 28, 2024	Open House – Coppin State University	MTA Hosted Meeting
Oct. 4, 2024	Mayor's Office of Immigrant Affairs	Community Outreach
Oct. 5, 2026	Fiesta Baltimore	Community Outreach
Oct. 8, 2024	BMORE BUS Open House – at Enoch Pratt Public Library, Southeast Anchor Branch	MTA Hosted Meeting
October 10, 2024	BMORE BUS Virtual Open House	MTA Hosted Meeting

MARC Growth & Transformation Plan

The MARC Growth and Transformation Plan updates and expands upon the MARC Cornerstone Plan from when it was last published in 2019, which provided strategic priorities for the system and the capital investment needed to achieve those initiatives. This long-range Plan synthesizes MTA plans, policies, and reports with performance data, local and national trends, and public and stakeholder input (**Table 13**). MTA comprehensively analyzed this information to create specific recommendations for growth and investment that coordinate with the needs of the transit system overall.

MTA employed a variety of strategies to spread the word about the study and collect feedback from the public and stakeholders, including:

- An online public survey open from October – December 2023, which collected nearly 4,700 responses
- A project inbox for community members to submit questions and comments regarding the plan. It received over 200 emails.

Table 13: MARC Growth & Transformation Plan Outreach

Date	Event Name	Outreach Type
December 12, 2024	Virtual Public meeting	MTA Hosted Meeting
August 19, 2025	Maryland State Senator James Rosapepe and Maryland State Senator Pamela Beidle's Office	Elected Official Meeting
March 13, 2025	MARC Riders Advisory Council	MTA Hosted Meeting
August 7, 2025	Montgomery County Council Transportation and Environment committee	Elected Official Meeting
October 22, 2025	Howard County Multimodal Transportation Board	Community Outreach
January 14, 2025	City of Brunswick, MD	Community Outreach
July 22, 2025	Baltimore Regional Transportation Board (BRTB)	Presentation
July 11, 2025	Baltimore Regional Transit Commission (BRTC)	Community Outreach
August 8, 2025	Montgomery County Department of Transportation (MCDOT)	Community Outreach
October 24, 2025	Washington Suburban Transit Commission	Community Outreach
July 25, 2025	Capital Region Rail Technical Advisory Committee	Presentation Briefing
June 24, 2025	Transportation Planning Board (TPB) Regional Public Transportation Subcommittee	Community Outreach
January 21, 2025	MTA Youth Transit Council	MTA Hosted Meeting
October 24, 2025	DMV Moves	Community Outreach

Additional Outreach Efforts: January 1, 2020-December 31, 2022

In addition to the BMORE BUS and MARC PLAN projects, MDOT MTA has attended or hosted a large number of public outreach efforts since submission of the previous Title VI Program. MTA's Department of Planning takes the lead on project-specific outreach and engagement, whereas MTA's Office of Customer and Community Relations (OCCR) and the Police Department engage in more generalized outreach and often attend community events to provide attendees with access to staff and information pertaining to day-to-day operations.

Outreach efforts undertaken by MTA's OCCR and Police divisions during the previous triennial period are summarized in the following tables:

- Formal notification of service changes (**Table 14**)
- Ongoing customer/community outreach (non-project-specific) (**Table 15**)
- Ongoing School Outreach (**Table 16**)
- Ongoing Police Outreach (**Table 17**)
- Project/Program Specific Outreach (**Table 18**)

Table 14: Formal Notification of Service Change

Date	Event	Event Type	Location
January 31, 2024	Issued press release and social media notices providing 30-day notice prior to first Public Hearing date	Commuter Bus SEA Public Notice	Virtual
February 1, 2024	Notifications to federal elected, state and county elected officials, and representatives from the Maryland Association of Counties (MACo) and Maryland Municipal League (MML)	Commuter Bus SEA Public Notice	Virtual
February – March 2024	Newspaper notices printed	Commuter Bus SEA Public Notice	Virtual/Print
May 22, 2024	Notified service providers, elected officials, jurisdictional stakeholders of final changes prior to issuing the news release	Commuter Bus SEA Public Notice	Virtual
May 22, 2024	Updated social media, posted new schedules webpage, sent rider alert	Commuter Bus SEA Public Notice	Virtual
June 28, 2024	Replaced signage and schedules system-wide	Commuter Bus SEA Public Notice	In-person
July 1, 2024	Implement changes and replace current schedules with new on the Commuter Bus webpage	Commuter Bus SEA Public Notice	Virtual

Table 15: Ongoing customer/community outreach

Date	Event	Event Type	Location
March 15, 2023	Mobility outreach event	Mobility resource event - community relations served as support	Colonial Baptist Church - Randallstown, MD
March 31, 2023	1st Annual Mayor's Older Adults Seminar @ New Shiloh Baptist Church	Resource event	In-person
May 3, 2023	William S. Baer School	Resource event	Resource table
June 3, 2023	Charles Street Promenade	Cooling Bus & Tabling	Charles Village
June 5, 2023	Govans Elementary School	Touch - a - Bus	In person
June 17, 2023	AFRAM	Cooling Bus & Tabling	Druid Hill Park
June 18, 2023	AFRAM	Cooling Bus & Tabling	Druid Hill Park
June 23, 2023	MICA Urban Teachers Community Resource Fair	Tabling	MICA
June 24, 2023	Pride Parade	Pride wrapped bus	Charles Village

Date	Event	Event Type	Location
June 25, 2023	Pride in the Park	Cooling Bus & tabling	Druid Hill Park
July 4, 2023	Cherry Hill Arts & Music Festival	Cooling Bus	Middle Branch Park
August 24-27 - September 4th, 7th thru 9th , 2023	2023 Maryland State Fair	Resource table	MDOT Village - Exhibition Hall
September 24th thru 27th 2023	2023 Artscape	Cooling bus & resource table	Mt. Vernon
February 29, 2024	Black History Month Event for Older Adults	Community Event and Resource Fair	Baltimore City
March 28, 2024	Older Adult Lunch & Learn – Greens at Irvington Mews	Resource Fair	Baltimore City
April 17, 2024	Dumbar High School Career Day	School Engagement	Baltimore City
June 8, 2024	Charles Street Promenade	Community Event and Cooling Bus	Baltimore City
June 15, 2024	Baltimore Pride Parade	Parade	Baltimore City
June 16, 2024	Baltimore Pride in the Park	Community Event and Cooling Bus	Baltimore City
June 22 - 23, 2024	AFRAM	Community Event and Cooling Bus	Baltimore City
August 2 - 4, 2024	Artscape	Community Event and Cooling Bus	Baltimore City
August 6, 2024	National Night Out	Community Event	Baltimore County
August 17, 2024	Children of Promise Back-to-School Fair	Community Event, Resource Fair, and Cooling Bus	Baltimore City
August 17, 2024	Marcus Parks Annual Back-to-School Event	Community Event, Resource Fair, and Cooling Bus	Baltimore City
August 22 - September 8, 2024	Maryland State Fair	Community Event	Baltimore County
September 14, 2024	Associated Black Charities Cookout	Cooling Bus	Baltimore City
September 28 - 29, 2024	Baltimore Book Festival	Community Event	Baltimore City
September 26, 2024	Older Adult Summit	Community Event and Resource Fair	Baltimore City
October 5 – 6, 2024	Fiesta Baltimore	Community Event and Cooling Bus	Baltimore City
November 9, 2024	Veterans Day Parade	Parade	Baltimore City
December 8, 2024	Mayor's Christmas Parade	Parade	Baltimore City
February 17, 2025	Baltimore City Black History Month Parade	Parade	Downtown, Baltimore City
February 28, 2025	Black History Month Event for Older Adults	Community Event and Resource Fair	Baltimore City
March 26, 2025	Cross Country Elementary School Career Day	School Engagement	Baltimore City

Date	Event	Event Type	Location
May 13, 2025	Greater Greenmount Association Meeting	Neighborhood Association Engagement	Baltimore City
May 21, 2025	Beth Tfiloh Adventure Day	School Engagement	Baltimore County
May 22, 2025	Older Adult Symposium	Community Event and Resource Fair	Baltimore City
May 23, 2025	Scott's Branch Elementary School Touch-A-Bus Event	School Engagement	Baltimore County
June 14, 2025	Baltimore Pride Parade	Parade	Baltimore City
June 14, 2025	Charles Street Promenade	Community Event and Cooling Bus	Baltimore City
June 21-22, 2025	AFRAM	Community Event and Cooling Bus	Baltimore City
July 8, 2025	Greater Greenmount Association Meeting	Neighborhood Association Engagement	Baltimore City
August 5, 2025	National Night Out	Community Event	Baltimore County
August 9, 2025	Summers in the 7th Block Party	Community Event, Resource Fair, and Cooling Bus	Baltimore City
August 10, 2025	Taste of Northwest	Cooling Bus	Baltimore County
August 16, 2025	Children of Promise Back-to-School Fair	Community Event, Resource Fair, and Cooling Bus	Baltimore City
August 16, 2025	Marcus Parks Annual Back-to-School Event	Community Event, Resource Fair, and Cooling Bus	Baltimore City
August 19, 2025	Commodore John Rodgers Back-to-School Night	School Engagement	Baltimore City
August 20, 2025	Dundalk Community Back-to-School Event	Community Event and Cooling Bus	Baltimore County
August 21 - September 7, 2025	Maryland State Fair	Community Event	Baltimore County
August 30, 2025	State's Attorney for Baltimore City Back-to-School Event	Community Event and Resource Fair	Baltimore City
September 11, 2025	Montessori Back-to-School Night	School Engagement	Baltimore City
September 13, 2025	Associated Black Charities Cookout	Community Event, Resource Fair, and Cooling Bus	Baltimore City
September 24, 2025	Older Adult Summit	Community Event and Resource Fair	Baltimore City
October 20, 2025	Turner Station Community Fair	Community Event and Resource Fair	Baltimore County
November 8, 2025	Veterans Day Parade	Parade	Baltimore City
December 14, 2025	Mayor's Christmas Parade	Parade	Baltimore City

Table 16: School Outreach

Date	Event
August 2024	Baltimore City College HS Back-to-School Event
September 2024	Baltimore City College HS Parent Student Night
September 2024	Paul Laurence Dunbar Back-to-School Event
March 25, 2025	Baltimore Polytechnic Institute Design Development Community Meeting
August 19, 2025	Commodore John Rodgers Elementary/Middle School Back-to-School Event
August 20, 2025	Dundalk Community - Safe Start Community Night
August 23, 2025	Mayor Brandon Scott's Back to School Kick-off
August 30, 2025	State's Attorney for Baltimore City Back-to-School Event
September 11, 2025	Baltimore Montessori School Back-to-School Event
October 10, 2025	Hispanic Heritage Month Celebration Gardenville Elementary School
October 23, 2025	Annual Legislative Caucus Field Trip
October 30, 2025	Pratt Library - Community Meet and Greet
November 5, 2025	Baltimore City College Final Design Recap & Construction
November 6, 2025	Western High School Open House
November 7, 2025	Quarterly Partner Safe Passage Session for Q1 2025
November 17, 2025	Associated Student Congress of Baltimore City
December 4, 2025	BCPS Parent & Community Advisory Board
December 9, 2025	Higher Achievement's High School Readiness Academy (HSRA)
December 13, 2025	BCPS Annual School Choice Fair
January 28, 2026	BCPS Transportation Conversation with BRTC & MTA
February 10, 2026	Western HS Relocation Family Sessions
February 19, 2026	Northwestern Building Advisory Committee (NBAC)
February 21, 2026	Western HS Daddy Daughter Tea (In-Person at The Forum)
February 25, 2026	Western HS Design Update Community
March 10, 2026	Western HS School Family Council Meeting

Table 17: Ongoing Police Outreach

Date	Event	Location
February 4, 2023	Maryland Special Olympics Maryland Polar Bear Plunge	Sandy Point State Park (1100 E. College Parkway, Annapolis, MD. 21409)
June 21, 2023	Maryland Special Olympics Torch Run	MTA Police Headquarters (4701 Mt. Hope Drive Baltimore, MD. 21215)
August 1, 2023	National Night Out	West Port Light Rail (2114 Kloman Street, Baltimore, MD. 21230) and Rogers Ave. Metro Station (4300 Hayward Avenue, Baltimore, MD. 21215)

Date	Event	Location
December 21, 2023	MDOT MTA Police Holiday Adopt-a-Family	Baltimore Montessori Charter School (1600 Guilford Avenue, Baltimore, MD. 21202)
June 12, 2024	Maryland Special Olympics Torch Run	MTA Police Headquarters (4701 Mt. Hope Drive Baltimore, MD. 21215)
August 6, 2024	National Night Out	Baltimore
October 25, 2024	First Responders Day	Kings Memorial Park (8710 Dogwood Road, Windsor Mill, MD. 21244)
December 20, 2024	MDOT MTA Police Holiday Adopt-a-Family	Gwynns Falls Elementary School (2700 Gwynns Falls Parkway, Baltimore, MD. 21216)
June 11, 2025	Maryland Special Olympics Torch Run	MTA Police Headquarters (4701 Mt. Hope Drive Baltimore, MD. 21215)
June 12, 2025	Touch a Truck Day	Har Sinai Oheb Shalom (7310 Park Heights Avenue, Baltimore, MD. 21208)
August 5, 2025	National Night Out	University of Maryland Pain Management Center (2200 Kernan Drive, Gwynn Oak, MD. 21207) & UMBC Stadium lot (1000 Hilltop Circle, Baltimore, MD.21250)
September 24, 2025	First Responders Day	Kings Memorial Park (8710 Dogwood Road, Windsor Mill, MD. 21244)
December 23, 2025	MDOT MTA Police Holiday Adopt-a-Family	Samuel Coleridge Elementary School (50

Table 18: Project/Program Specific Outreach

Commuter Bus Service Equity Analysis		
Date	**Event**	**Location**
March 18, 2024	Public Hearing for Summer Service Changes	Virtual
March 21, 2024	Public Hearing for Summer Service Changes	Virtual
March 23, 2024	Public Hearing for Summer Service Changes	Virtual
March 26, 2024	Public Hearing for Summer Service Changes	In-Person – Annapolis Library
March 27, 2024	Public Hearing for Summer Service Changes	In-Person – George Howard Building, Ellicott City

Red Line Outreach	
Date	**Event**
April 18, 2023	HUB West Baltimore CDC; Edmondson Community Association
July 11, 2023	Irvington Community Association
August 15, 2023	Little Italy Neighbors Association
August 30, 2023	Fells Point
September 6, 2023	Canton Community Association – Leadership
September 20, 2023	Edmondson Village
October 10, 2023	Brewer's Hill Community Association

Red Line Outreach	
Date	**Event**
October 24, 2023	Canton Community Association
October 25, 2023	Greek Town Neighbors Association
November 30, 2023	Fells Prospect Community Association
December 5, 2023	Heritage Crossing
December 11, 2023	West Hills Community Association
December 12, 2023	Christ the King Church
December 19, 2023	Highland Town Community Association
March 12, 2024	Rosemont Community Association
April 4, 2024	Franklin Sq. Community Association
April 4, 2024	ARCO – Alliance of Rosemont Community Organizations
April 8, 2024	Harlem Park Neighborhood Council (HPNC)
April 9, 2024	Coppin Heights CDC (CHCDC)
April 17, 2024	Hunting Ridge Community Association
June 6, 2024	Harlem Park Neighborhood Council, Inc.
June 29, 2024	St. Bernadine's Church
June 29, 2024	CALLED/Perkins Sq Baptist Church
July 1, 2024	Hunting Ridge Community Association
July 6, 2024	Shiloh Baptist Church
July 9, 2024	St. Bernadine's Church
July 13, 2024	Edmondson Village Community Unity Day
July 13, 2024	Franklin Sq. Comm. Assoc.
July 14, 2024	Hunting Ridge Presbyterian Church Strawberry Fest
July 18, 2024	Poppleton NOW
July 22, 2024	West Hills Community Association
July 23, 2024	The Fayette Street Outreach Org, Inc.
August 6, 2024	West Hills Community Association
August 17, 2024	Sandtown Winchester Community Collaborative
September 17, 2024	Little Italy Neighborhood Association
September 18, 2024	ARCO Community Association
September 20, 2024	Poppleton Now Community Association
September 26, 2024	Edmondson Village Community Conversation
October 2, 2024	Butchers Hill Community Association
October 10, 2024	Uplands Community Association
October 11, 2024	Lyndhurst Community Association
October 15, 2024	Hunting Ridge Community Association
November 6, 2024	Ridgely's Delight Neighborhood Association
November 12, 2024	Historic Jonestown Neighborhood Association
November 13, 2024	Hollins Roundhouse Neighborhood Association
November 14, 2024	Southwest Better Neighborhood Association
November 18, 2024	West Hills Community Association
November 18, 2024	Patterson Park Neighborhood Association
November 19, 2024	Canton Community Association

Red Line Outreach	
Date	**Event**
December 3, 2024	Bon Secours Community Outreach Center
December 4, 2024	Livable Streets Coalition
December 11, 2024	Transform Maryland Coalition
January 4, 2025	40th District Pre Session-Briefing
January 25, 2025	City For All Forum
January 27, 2025	Mount Clare Community Council
January 28, 2025	Maryland Quality Initiative Conference
February 1, 2025	Baltimore County Black History Celebration
February 7, 2025	Allendale Community Association
February 15, 2025	Rosemont Community Interfaith Coalition
February 19, 2025	Park Trails Community Association
February 20, 2025	Belmont Elementary School – Career Readiness
February 21, 2025	Engineers Week 2025
February 22, 2025	MTA Youth Transit Council
February 26, 2025	Belmont Elementary School Data Night
February 27, 2025	Coppin Unity Day and Marketplace
March 8, 2025	Security Square Mall Vendor Outreach
March 10, 2025	Upper Fells Point Residents Association
March 12, 2025	City Center Residents Association
March 12, 2025	Lexington Market Transit Day
March 18, 2025	Little Italy Neighborhood Association
March 20, 2025	Security-Woodlawn Business Association Community Meet & Greet
March 21, 2025	James McHenry Elementary/Middle School PTSO
March 27, 2025	COMTO Transit Panel: Sustainability and Innovation
April 1, 2025	Johns Hopkins University – School of Engineering
April 7, 2025	Union Square Neighborhood Association
April 8, 2025	Pigtown Neighborhood Association
April 12, 2025	Morning Start Baptist Church
April 22, 2025	Fayette Street Outreach
May 7, 2025	Fells Point Resident Association
May 13, 2025	West Baltimore United Stakeholder Meeting
May 13, 2025	No Boundaries Coalition Meeting
May 19, 2025	West Hills Community Association
May 19, 2025	Highlandtown Community Association
May 20, 2025	Hunting Ridge Community Association
May 29, 2025	Fells Prospect Community Association
June 10, 2025	Irvington Community Association
June 26, 2025	Center City Residents Association

Language Assistance Plan

Introduction

Spanning portions of three states via five transit modes, the MDOT MTA service area is diverse racially, socioeconomically, and linguistically. This Language Assistance Plan uses a combination of data sources – including the U.S. Census, ridership surveys, frontline staff focus groups, and data on constituent requests for translation or interpretation – to understand the use of MDOT MTA service and the role it plays in the lives of limited English proficient (LEP) populations across the service area.[2] At MDOT MTA, language accommodation resources are housed under the Office of Equal Opportunity Compliance Programs. The Title VI and ADA Coordinator is responsible for coordinating across departments to ensure resources are made available and that staff are trained in the appropriate protocol.

This Language Assistance Plan begins with a Four Factor Analysis assessing the presence of LEP populations in the MDOT MTA service area, how likely MDOT MTA modes are to interact with LEP riders, the role MDOT MTA service plays in the lives of LEP persons, and which languages are most commonly encountered. Based on this analysis, it concludes with existing and future language access strategies necessary for MDOT MTA to ensure meaningful access to MDOT MTA programs and activities for its LEP constituency.

Four Factor Analysis

The Four Factor Analysis provides a framework through which recipients of federal funding can determine the extent of their obligation to provide services to LEP individuals. The FTA requires that all recipients use the Four Factor Analysis to ensure their programs, policies, and activities comply with Title VI regulations, and to aid in Language Assistance Planning. The following factors were taken into account when developing MDOT MTA's Language Assistance Plan:

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. To assess this factor, the following metrics were analyzed:

- Identification of LEP communities in the MDOT MTA service area
- How LEP persons interact with MDOT MTA services.
- Identification of LEP communities that use MDOT MTA services.

Factor 2: The frequency with which LEP persons come into contact with the program. To assess this factor, the following metrics were analyzed:

- How often LEP persons ride MDOT MTA transit services.
- How often LEP persons interact with customer service.

[2] The MDOT MTA service area profiled in this section is comprised of the amalgamation of the individual modes' service areas, as defined in the **Service Area Profile** section of this Title VI Program. While the MDOT MTA service area is made up of a collection of Census Block Groups, population-level data analyzed in the Language Assistance Plan is only available at the Census Tract level. Where this is the case, entire Census Tracts containing relevant Block Groups have been substituted.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. To assess this factor, the following question was analyzed:

- How reliant MDOT MTA LEP riders are on the programs and services MDOT MTA provides.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. To assess this factor, the following questions were analyzed:

- What are MDOT MTA's budget constraints.
- What potential exists for sharing of language assistance materials and services among and between the transit agency and community groups.

The FTA requires that MDOT MTA use the findings from the Four Factor Analysis to determine which language assistance services are appropriate and address the identified needs of MDOT MTA's unique transit riders. In addition to the results of the Four Factor Analysis, this Language Assistance Plan includes the following required elements:

- A description of how MDOT MTA provides language assistance services, by languages.
- A description of how MDOT MTA provides notices to LEP persons about the availability of language assistance.
- A description of how MDOT MTA monitors, evaluates, and updates the Language Assistance Plan.
- A description of how MDOT MTA trains employees to provide timely and reasonable language assistance to LEP populations.

Methodology

Table 19 summarizes data sources used to complete the Language Assistance Plan Four Factor Analysis.

Table 19: Language Assistance Plan Four Factor Analysis Measures and Data Sources

Factor	Measures	Data Sources
Factor 1: The number or proportions of LEP persons eligible to be served or likely to be encountered by the program or recipient.	- Presence of limited English proficient populations in the MDOT MTA service area. - Use of MDOT MTA services by limited English proficient populations.	- American Community Survey (ACS) 2019-2023 Five-Year Estimates - Focus Groups with MDOT MTA Operators, Station Managers, Conductors and Police - Interview with Baltimore City Community College (BCCC) ESL Program Manager - MDOT MTA Origin-Destination Rider Studies - Core Bus (2025) - Commuter bus (2025) - MARC (2025) - Light Rail (2025) - Metro Subway (2025) - MDOT MTA Customer Satisfaction Study (2019)
Factor 2: The frequency with which LEP persons come into contact with the program.	- Non-English-speaking customer service inquiries received by MDOT MTA. - Frequency with which LEP riders make transit trips, by mode.	- American Community Survey (ACS) Estimates - Recent Language Line Usage History - Focus Groups with MDOT MTA Operators, Station Managers, Conductors and Police - Requests for Interpretation and Translation - Requests for Website Translation - MDOT MTA Origin-Destination Rider Studies - MDOT MTA Customer Satisfaction Study (2019)
Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.	- Ability to make trip if MDOT MTA transit were not available, by mode. - Access to a vehicle, by mode. - Trip purpose, by mode.	- Focus Groups with MDOT MTA Operators, Station Managers, Conductors and Police - MDOT MTA Origin-Destination Rider Studies - MDOT MTA Customer Satisfaction Study (2019)
Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.	- Description of existing MDOT MTA LEP resources.	- Current MDOT MTA Language Assistance Plan - Discussions with MDOT MTA Staff - Focus Groups with MDOT MTA Operators, Station Managers, Conductors and Police

Factor 1

Factor 1: The number or proportion of limited English proficient persons eligible to be served or likely to be encountered by the recipient.

How LEP Persons Interact with MDOT MTA

Like all MDOT MTA riders, LEP riders interact with MDOT MTA as they use the agency's bus and rail transit services. LEP persons interact with rail station agents, bus operators and MTA police officers and use the fare equipment, navigation and trip planning aids MDOT MTA offers, including system maps, route schedules, and other printed materials or online resources. Riders interact with MDOT MTA staff at the agency's Reduced Fare office, Transit Store, and Mobility office when seeking assistance with relevant programs. In addition, they solicit help from and provide feedback to MDOT MTA staff at public outreach activities, or via MDOT MTA's web-based comment card or Transit Information Contact Center.

Focus Groups with Operators and Frontline Staff

To further address the questions of how, why, and where LEP persons interact with the agency, in January and February 2026, MDOT MTA conducted focus groups with frontline staff from all five transit modes and spoke with MTA Police representatives. Focus group participants included:

- Core Bus (bus operators, superintendents, and assistant superintendents)
- Commuter Bus (bus operators, supervisors, dispatch, general manager, and director)
- MARC Commuter Rail (conductors, engineers, district managers, and directors)
- Metro Subway (operators, station attendants, manager of transportation, and superintendents)
- Light Rail (operators, assistant superintendent, and director)
- Police (patrol officers, supervisors, detectives, sergeants, and commanders)

Focus group participants offered insight on languages frequently encountered during interactions with riders with LEP, common LEP rider boarding locations along routes, and issues commonly arise, such as requests for directions or assistance with fare payment. **Table 20** highlights, by focus group mode, language groups most commonly encountered, as well as the routes, lines, or stations most likely to serve LEP riders, as identified by MDOT MTA personnel.

Across modes, Spanish was identified as the language most commonly and frequently encountered. Some staff noted that there was a particularly large community of Spanish-speaking people around Highland Avenue and in the Highlandtown area. Staff also noted that Johns Hopkins University Metro station, BWI MARC and Light Rail stations, Union Station in DC, and Penn Station in Baltimore all attract many riders who speak different languages because of the activities and destinations located near these stations.

Core bus and MARC staff reported that many LEP riders they interacted with were trying to reach the post office or immigration office and needed assistance doing so. Staff from multiple modes, particularly MARC, also reported frequent interactions with deaf and hard-of-hearing passengers, though they indicated that communication is typically manageable through writing or simple signs. Across modes, the most common inquiry involved requests for directions and help getting to a specific location. Metro SubwayLink staff noted that station-area maps posted on station walls help answer many of these questions.

Staff further reported that LEP riders often approach them with a translation app on their personal phones, which they use to verify information or ask additional questions. However, staff noted that this is less useful in some SubwayLink stations where Wi-Fi access is limited. While some staff were familiar with I Speak cards and Tear Off sheets, few had them available, and many were unaware of how to request additional copies for printing and distribution.

Table 20: MDOT MTA Language Access Focus Groups Summary

Mode	Language Groups Most Commonly Encountered	Routes/Lines/Stations Where LEP Speakers Most Commonly Encountered
Core Bus	• Spanish • French • African Languages • Korean • Chinese	• CityLink routes: Orange & Blue out of Bush St , Pink in Sedonia area, Navy • Local Bus routes: 76, 32, 93, 22, 65, 63 • Most of the lines in Eastern Bus Division • Highlandtown area • Hunt Valley
Commuter Bus	• Spanish • Russian (some) • Korean (some)	• Route 201 • Route 204 • Baltimore Service Area
MARC Commuter Rail	• Spanish • French • ASL/hard-of-hearing • Farsi • Hindi • Russian	• Union Station • Greenbelt to immigration office in Baltimore • Frederick to DC – large amount of deaf passengers • More on the Baltimore side
Metro Subway	• Spanish • Russian • ASL/hard-of-hearing	• State Center Station • Johns Hopkins Station • Orange Mills Station • Lexington Market Station • Charles Center Station
Light RailLink	• Spanish • ASL/hard-of-hearing	• BWI • Patapsco

Source: MDOT MTA Operator/Frontline Staff Focus Groups (2026)

LEP Communities and English Proficiency

Census Data

As detailed in the Service Area Profile, the combined MDOT MTA service area is defined as the combination of fixed-route service area definitions shown in **Table 21**. **Figure 7** provides a geographic look at where LEP households are located in the MDOT MTA service area.

Table 21: MDOT MTA Service Area Definitions[3]

Mode	Service Area Definition
Core Bus	All Census Block Groups within 0.5 miles of Core Bus stops.
Commuter Bus	All Census Block Groups within three miles of Commuter Bus stops, excluding stops where morning boarding is not possible.
MARC Commuter Rail	All Census Block Groups within three miles of MARC stations.
Light Rail	All Census Block Groups within 0.75 miles of Light Rail stations.
Metro Subway	All Census Block Groups within 0.75 miles of Metro Subway stations.

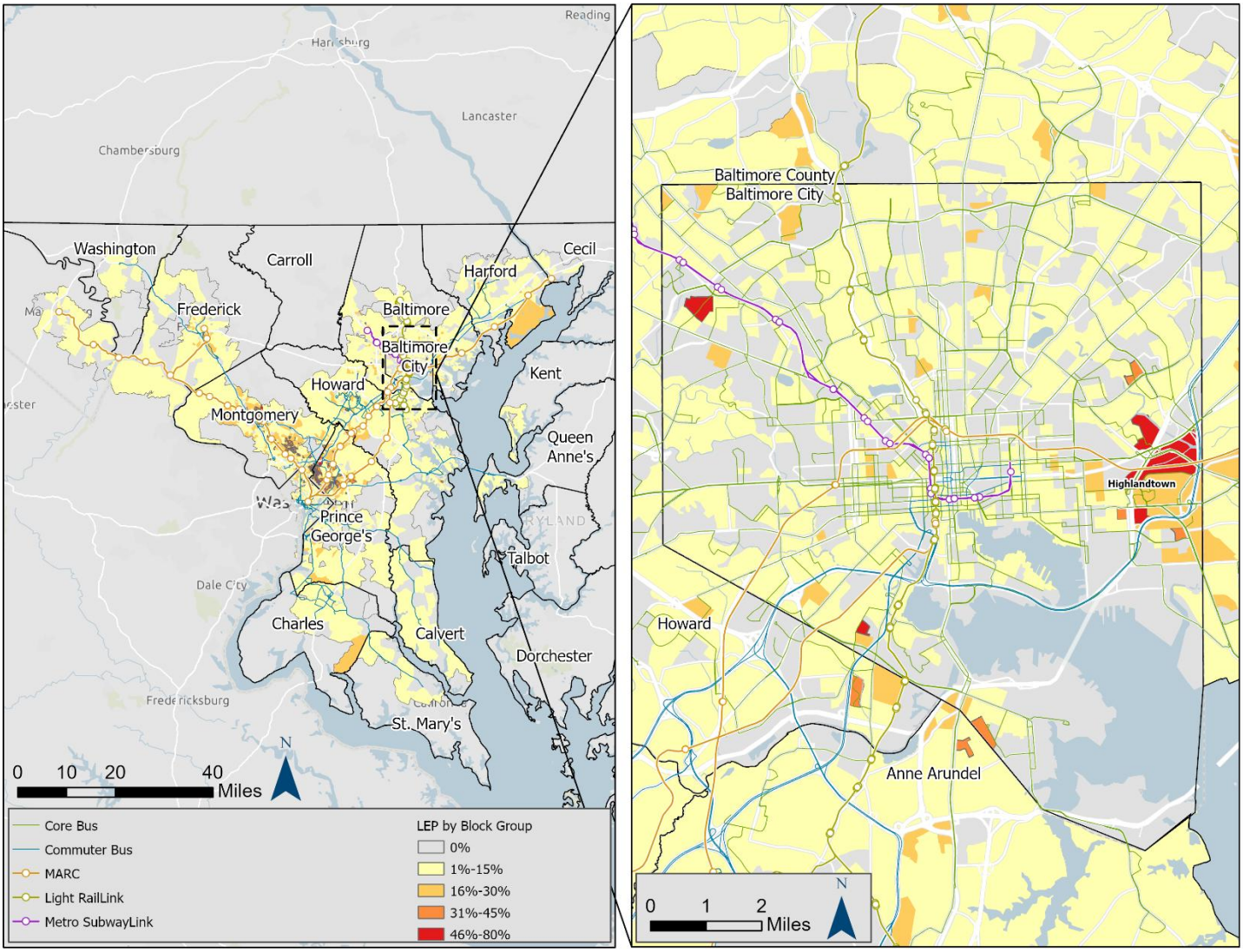
Almost seventy-seven percent (76.87%) of residents living in the MDOT MTA service area speak English as their primary language. About nine and a half percent (9.51%) of households report Spanish as their primary language; among this group, more than twenty percent (21.51%) identify as limited English speaking. Almost six percent (5.80%) of residents speak languages falling into the "other Indo-European" category, which includes a variety of Germanic, Scandinavian, Romance, Slavic, and Indic languages. Among this population, more than twelve percent (12.64%) identify as limited English proficient.

A little more than four percent (4.30%) of MDOT MTA service area residents speak Asian or Pacific Island languages at home, including Chinese, Japanese, Korean, Tagalog, Telugu, Thai, and Vietnamese. Among this group, almost twenty percent (19.71%) are considered limited English proficient. Finally, other language speakers, including those speaking African languages, Arabic, Hebrew, and languages native to North, Central, or South America, make up more than three percent (3.51%) of the MDOT MTA service area. Almost twelve percent (11.61%) of these residents are considered LEP.

[3] In this Language Assistance Plan, the MDOT MTA service area is assumed to include the collection of Census Block Groups defined in the **Service Area Profile** section of this Title VI Program. However, while household-level five-year estimates were available at the Block Group level, population-level five-year estimates were only available at the Census Tract level. Thus, population-level data reported includes all Census Tracts (rather than Block Groups) intersecting with the combined MDOT MTA service area.

Table 22 summarizes, by number of households, primary language groups spoken at home and LEP status in Block Groups located within the MDOT MTA service area. [4] [5]

Figure 7: Location of LEP Populations in MDOT MTA Service area



[4] Source: American Community Survey Five-Year Estimates, 2019-2023 Table B16004: Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

[5] All block groups with an LEP population of zero, or those without any population statistics, are visualized as gray. In the previous update, these block groups were visualized in yellow along with 1%-15% LEP population, while some remained gray because some block groups were excluded when data was pulled for the previous update.

Table 22: Language Group Spoken at Home by Number of Households: LEP/Non-LEP Status

Language Group Spoken at Home	Households Speaking Language in Service Area	Percent of Service Area Households	Percentage of Language Group that is LEP	Percentage of Language Group that is not LEP
English	1,548,258	76.87%	-	-
Spanish	191,617	9.51%	21.51%	78.49%
Other Indo-European Languages	116,878	5.80%	12.64%	87.36%
Asian and Pacific Island Languages	86,611	4.30%	19.71%	80.29%
Other Languages	70,765	3.51%	11.61%	88.39%

Source: American Community Survey Five-Year Estimates, 2019-2023 Table C16002: Household Language by Household

Limited English-Speaking Status

Table 23 breaks down the top language groups spoken in the MDOT MTA service area (other than English) by the percent of the total population speaking, as well as the percentages within each language group that identify as strong English speakers (speaking English "very well") or limited English proficient (speaking English "less than very well"). Results confirm that Spanish speakers make up the largest home language group in the MDOT MTA service area (around ten percent (10%) of the population), followed by: Other Indo-European and Other and Unspecified languages, both at more than two percent (2%) of the service area population; French, Haitian, or Cajun, Other Asian Pacific Islander, and Chinese, all at more than one percent. The following languages are spoken by less than one percent (1%) of the MDOT MTA service area population: Korean, Russian, Polish, or other Slavic, Tagalog, Arabic, Vietnamese, and German or other West Germanic.

Table 23: Language Group Spoken at Home by Percent of Service Area Population and Percent LEP or Non-LEP[6]

Language	Total Speaking Language in Service Area	Percent of Total Service Area Population	Percent of Language Group that Speaks English "Very Well"	Percent of Language Group that Speaks English "Less than Very Well"
English	4,463,727	78.27%	-	-
Spanish	575,415	10.09%	55.24%	44.76%
Other Indo-European Languages	146,105	2.56%	71.05%	28.95%
Other and Unspecified	145,298	2.55%	75.98%	24.02%
French, Haitian, or Cajun	76,846	1.35%	74.13%	25.87%

[6] This data is available at the Census Tract (rather than Block Group level) only for five-year estimates; as such, this table uses all Census Tracts intersecting with the MDOT MTA service area.

Language	Total Speaking Language in Service Area	Percent of Total Service Area Population	Percent of Language Group that Speaks English "Very Well"	Percent of Language Group that Speaks English "Less than Very Well"
Chinese (incl. Mandarin, Cantonese)	71,724	1.26%	55.18%	44.82%
Other Asian and Pacific Island Languages	58,888	1.03%	70.64%	29.36%
Korean	35,082	0.62%	53.03%	46.97%
Russian, Polish, or other Slavic Languages	35,709	0.63%	73.25%	26.75%
Tagalog (incl. Filipino)	31,615	0.55%	74.20%	25.80%
Arabic	22,932	0.40%	69.49%	30.51%
Vietnamese	19,994	0.35%	46.86%	53.14%
German or Other West Germanic Languages	19,547	0.34%	86.85%	13.15%

Source: American Community Survey Five-Year Estimates, 2019-2023 Table C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Overall, more than twenty percent (21.73%) of residents in the MDOT MTA service area speak a language other than English at home.[7] Many of these residents are English proficient and do not require language accommodations. However, a relatively small share of the service area population, eight percent (8.03%) speaks English less than very well and is thus considered LEP. **Table 24** summarizes all language groups with at least 1,000 LEP speakers living in the MDOT MTA service area, as well as each group's share of the total service area population. Spanish-speaking LEP residents make up the largest share of the total population at about four percent (4.52%). Chinese LEP residents are the second largest specified language group, constituting just over one-third of one percent (0.35%) of the service area population, and several language groups each make up less than one percent of the service area.

MDOT MTA has adopted a policy to translate vital documents into languages whose percentage of LEP residents in the composite MDOT MTA service equals at least one percent (1.00%) of the total service area population. Using this standard, MDOT MTA translates vital documents into Spanish. MDOT MTA staff will monitor data relating to the populations of LEP residents within the MDOT MTA service area on an ongoing basis. Should any other populations of LEP speakers rise above the one percent (1.00%) threshold, translation of vital documents into those languages will occur then.

That said, MDOT MTA also provides additional translation services upon request, above and beyond its commitment for automatic translation of vital documents. Translation of vital documents for additional languages, beyond those whose percentage of LEP residents in the composite MDOT MTA service equals at least one percent, as well as translation of non-vital documents, is provided upon request. In addition, onsite language interpretation services are provided, upon request.

[7] This figure includes residents not shown speaking languages that account for a relatively small portion of the MDOT MTA service area.

Table 24: Total LEP Speakers by Language and Share of Total Service Area Population

Language	LEP Speakers	LEP Percent of Total Population
Spanish	257,558	4.52%
Other Indo-European Languages	42,291	0.74%
Other and Unspecified	34,895	0.61%
Chinese (incl. Mandarin, Cantonese)	32,150	0.56%
French, Haitian, or Cajun	19,878	0.35%
Other Asian and Pacific Island Languages	17,290	0.30%
Korean	16,479	0.29%
Vietnamese	10,624	0.19%
Russian, Polish, or other Slavic Languages	9,553	0.17%
Tagalog (incl. Filipino)	8,158	0.14%
Arabic	6,996	0.12%
German or Other West Germanic Languages	2,570	0.05%

Source: American Community Survey Five-Year Estimates, 2019-2023 Table C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

In applying the FTA Safe Harbor provision, MDOT MTA evaluated translation needs through a comprehensive four-factor analysis that extends beyond Census population data alone. While the American Community Survey (ACS) data presented in the **Table 24** identifies twelve language groups within the service area, MDOT MTA also considered Origin-Destination survey data reflecting languages actually spoken by riders (Factor 1), qualitative insights gathered through focus group interviews with front-line operators who interact directly with LEP riders (Factor 1), and Language Line utilization data capturing real-time interpreter service demand (Factor 2). This multi-source approach ensures that translation resources are directed toward languages with demonstrated and documented rider need, rather than solely based on residential population estimates. Based on this analysis, MDOT MTA currently provides vital document translation in Spanish, Mandarin Chinese, Yoruba, Amharic, French, Vietnamese, Korean, Russian, Tagalog, and Arabic, reflecting the languages most frequently encountered across the transit system, as **Figure 8** shown.

Literacy Skills of LEP Populations in their Native Languages

MDOT MTA recognizes that not all riders with LEP are literate in their primary language. This effort is also responsive to the Maryland House Bill 1473 (HB 1473), “State Government - Equal Access to Public Services for Individuals With Limited English Proficiency and Individuals With Disabilities,” which was approved and took effect October 1, 2025.

To improve language access for LEP individuals with low literacy, MDOT MTA may incorporate universal visuals and graphics into outreach materials. These tools can help communicate key information more effectively to riders with limited literacy. In addition, MDOT MTA will seek to collect data on literacy in riders’ primary languages through future surveys.

Origin-Destination Studies

The data presented in this section is sourced from the most recent origin-destination surveys available for each by mode. MDOT MTA conducted surveys for all modes in 2023 and 2024, and results were based on the ridership during the survey period.

Brief descriptions of each of the five origin-destination survey's methods are provided below. The survey results provide insight as to how and where LEP populations use MDOT MTA transit services. The methodologies described below change very little if at all from the previous survey. Updated data on LEP riders will be shared with internal stakeholders to help inform language service needs.

Description of Study Methods

The MDOT MTA Baltimore Link Core Bus Origin-Destination Study was published in November 2024 and conducted during the fall of 2023 and spring of 2024. Riders were asked questions specific to their trip on a given day. MDOT MTA riders completed 14,627 surveys in all. Survey results were weighted based on monthly ridership at the time of the survey.

The MDOT MTA MARC Origin-Destination Study was published in May 2024 and conducted during the spring of 2023. Riders were asked questions specific to their trip on a given day. More than 1,600 surveys were responded across trips (including both weekday and Saturday service). Survey results were weighted based on monthly ridership at the time of the survey.

The MDOT MTA Light Rail Origin-Destination Study was completed in December 2024 and conducted from October 2023 through June 2024. More than 1,000 survey questionnaires were responded to on light rail vehicles, including on weekdays, Saturdays, and Sundays. Survey results were weighted based on monthly ridership at the time of the survey.

The MDOT MTA Metro Subway Origin-Destination Study was completed in December 2024 and conducted from October 2023 through June 2024. Across the system, 850 surveys were collected. Survey results were weighted based on monthly ridership.

The MDOT MTA Commuter Bus Origin-Destination Study was completed in June 2024 and conducted at park and ride lots and employment hubs in the spring of 2023. A total of 451 surveys were completed by Commuter Bus riders. Across modes, riders were surveyed on weekdays and weekends throughout various times of the day.

Key Results Pertaining to Language Access

Based on the origin-destination surveys, **Table 25** summarizes riders' English speaking proficiency for Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway service.[8] Overall, a relatively small percentage of riders identify as LEP. Metro Subway has the highest share of LEP monthly riders at more than fifty percent (51.22%), followed by Core Bus and Commuter Bus at around thirty percent (32.71% and 29.96% respectively) and MARC at nearly twenty percent (18.30%). Light Rail has the relatively lowest percentage of LEP ridership: around eight percent (8.11%).

[8] Results presented in this table indicate the percentages of riders answering the question "How well do you speak English?" Riders abstaining from answering were not included.

Table 25: Riders' English Proficiency: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

English Proficiency of Ridership	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Less than Very Well	32.71%	29.96%	18.30%	8.11%	51.22%
Very Well	67.29%	70.04%	81.70%	91.89%	48.78%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

Table 26 summarizes the top five LEP languages (identifying as speaking a language other than English at home and speaking English less than "very well") represented among Core Bus monthly trips. Spanish accounts for the largest percentage of all trips with 75,767 monthly passenger trips, or nearly two percent (1.8%), followed by French at approximately one quarter of one percent (0.27%), Arabic at less than one quarter of one percent (0.17%), Amharic at less than one quarter of one percent (0.08%), Nepali also at less than one quarter of one percent (0.07%), and other languages all combined which were less than one percent (0.77%).

Table 26: Core Bus LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	75,767	58.66%
French	11,464	8.88%
Arabic	7,296	5.65%
Amharic	3,186	2.47%
Nepali	2,873	2.22%

Source: MDOT MTA Baltimore Link Bus Origin-Destination Study (2023-2024)

Table 27 summarizes the top LEP languages represented among Commuter Bus monthly trips. Like other modes, Spanish or Spanish Creole represents the highest share of Commuter Bus trips with 2,295, or approximately two and a half percent (2.5%) of all riders, followed by Korean with over half of one percent (0.6%) and Chinese with more than a quarter of one percent (0.31%).

Table 27: Commuter Bus LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	2,295	73.66%
Korean	544	17.45%
Chinese	277	8.89%

Source: MDOT MTA Baltimore Link Bus Origin-Destination Study (2023-2024)

Table 28 summarizes the top five LEP languages represented among MARC monthly trips. Like Core Bus, Spanish or Spanish Creole represents the highest share of MARC trips with 2,197, or a little more than three-quarters of one percent (0.78%) of all riders, followed by French with almost half of one percent (0.39%), Chinese at more than a quarter of one percent (0.32%), and Vietnamese and Korean less than one quarter of one percent each (0.19%).

Table 28: MARC LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	2,197	29.54%
French	1,113	14.97%
Chinese	906	12.19%
Vietnamese	544	7.32%
Korean	528	7.10%

Source: MARC Origin-Destination Study (2023)

Table 29 summarizes the top four LEP languages represented among Light Rail monthly trips. Like Core Bus, Spanish or Spanish Creole represents the highest share of Light Rail trips with 1,707, or a little more than half of one percent (0.58%) of all riders, followed by French with less than a quarter of one percent (0.14%), Korean also with less than a quarter of one percent (0.11%), and Chinese also with less than one quarter of one percent (0.04%).

Table 29: Light Rail LEP Riders' Top Languages Spoken[9]

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	1,707	54.84%
French	417	13.39%
Korean	319	10.25%
Chinese	129	4.14%

Source: Light Rail Origin-Destination Study (2023-2024)

Table 30 summarizes the top five LEP languages among Metro Subway monthly trips. An estimated 10,948 monthly trips, or slightly more than two percent (2.15%) belong to Spanish or Spanish Creole LEP riders. This is followed by French with a little more than one percent (1.29%), Hebrew with about a third of one percent (0.31%), Chinese with less than one quarter of one percent (0.12%), and Yoruba and Nepali also less than one quarter of one percent (0.11% each).

Table 30: Metro Subway LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	10,948	50.23%
French	6,583	30.20%

[9] While American Sign Language ranked third on this list, it is assumed that the majority of American Sign Language speakers can read and write English with higher than limited proficiency.

Hebrew	1,585	7.27%
Chinese	593	2.72%
Yoruba	583	2.68%
Nepali	583	2.68%

Source: Metro Subway Origin-Destination Study (2023-2024)

Finally, participants were asked to identify their primary language spoken at home. Approximately ninety-eight percent (98%) of Commuter Bus riders answered English to this question, while two percent (2%) answered “Other.”

In sum, rider survey results largely reinforce findings from data obtained from the Census: while LEP ridership of MDOT MTA services is relatively quite low, Spanish or Spanish Creole is the predominant LEP language group among the MDOT MTA rider base. While other LEP language groups are reached through service, MDOT MTA encounters LEP Spanish speakers at a substantially higher rate than other LEP language groups.

Factor 2

Factor 2: The frequency with which limited English proficient persons come into contact with the program.

LanguageLine Usage

Table 31 lists the use of MDOT MTA's LanguageLine account for the period spanning January 2023 through January 2026, by language. By conference calling an interpreter via the paid service (which is free to customers), MDOT MTA may use LanguageLine service to assist customers requiring language assistance.

Table 31: MTA LanguageLine Use, January 2023-January 2026

Language	Calls		Call Minutes		
	Total	Percent	Total	Average Length	Percent
Spanish	810	90.00%	7384	9.1	81.78%
Arabic	15	1.67%	219	14.6	2.43%
Russian	14	1.56%	301	21.5	3.33%
Tigrigna	9	1.00%	193	21.4	2.14%
Mandarin	8	0.89%	162	20.3	1.79%
Swahili	7	0.78%	88	12.6	0.97%
Farsi	6	0.67%	87	14.5	0.96%
French	4	0.44%	98	24.5	1.09%
Amharic	3	0.33%	79	26.3	0.87%
Dari	3	0.33%	97	32.3	1.07%
Punjabi	3	0.33%	64	21.3	0.71%
Vietnamese	3	0.33%	65	21.7	0.72%
Burmese	2	0.22%	41	20.5	0.45%
Pashto	2	0.22%	17	8.5	0.19%
Portuguese	2	0.22%	38	19	0.42%
Turkish	2	0.22%	5	2.5	0.06%
Wolof	2	0.22%	32	16	0.35%
Georgian	1	0.11%	8	8	0.09%
Haitian Creole	1	0.11%	11	11	0.12%
Portuguese Brazilian	1	0.11%	16	16	0.18%
Rundi	1	0.11%	10	10	0.11%
Zo	1	0.11%	14	14	0.16%

Source: MDOT MTA Language Line

Spanish calls made up around eighty-two percent (81.78%) of all LanguageLine call minutes during this period, and ninety percent (90.00%) of all calls. Arabic calls made up more than two percent (2.43%) of call minutes and almost two percent (1.67%) of calls, and Russian speakers accounted for over three percent (3.33%) of call minutes and over one percent (1.56%) of calls. A variety of additional language groups accounted for relatively lower percentages of calls and total minutes. Notably, the average call length for Spanish speakers (around nine minutes) was shorter compared to many other languages, with the exception of Pashto, Georgian, and Turkish.

Requests for Interpreters and Written Translation

MDOT MTA provides oral interpreters at public meetings or other public participation efforts when requested. Requests for interpreters are generally fairly limited, and during the pandemic period there were very few requests as most meetings were taking place virtually. MDOT MTA staff reported that there were four requests for American Sign Language (ASL) during 2023 - 2026. There was one request for Spanish for On-Site Interpretation, and one request for Spanish for Car Card. MTA staff did proactively provide several presentations in Spanish through on-call planning consultants or through Spanish speaking Planning staff. Additionally, as MDOT MTA staff went door-to-door in communities affected by service or infrastructure changes, team members carried Spanish versions of materials and, when possible, assigned bilingual staff to teams. Staff noted that providing information about other languages in the field is more challenging but are working on ways to address it.

Website Translation

MDOT MTA offers translation of its website into more than 100 languages. Users may click the “Translate” button at the top right of the screen and select the language. Web analytics use the language of the user’s computer settings to interpret the requested translation language. Requests come from all over the globe and can be pinpointed to the home country of the request. During 2025, across 28 million page views, ninety-eight percent (98.4%) were English, about one percent (1.4%) were Chinese and Spanish, and other language were under a quarter of a percent (0.2%). While this data does not specify whether users identified as LEP, it does comport with Census data cited in Factor 1 showing Spanish as the most prevalent language group in the MDOT MTA service area.

Rider Surveys

While the MDOT MTA Origin-Destination Rider Studies did not ask participants to identify how often they ride MDOT MTA (such as daily, weekly, or less frequently), through the estimated monthly LEP trips reported in the Factor 1 analysis, the studies present a broad picture of how often LEP persons board MDOT MTA rail or bus services. At the time of the surveys, LEP ridership accounted for over almost ten percent (9.89%) of total ridership.

Factor 3

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Data on alternate trip options, fare payment, vehicle access, and trip origins and destinations provide a window into the nature and importance of MDOT MTA's programs and services to LEP riders. Origin-destination study data shows that Core Bus, MARC, Light Rail, and Metro Subway services are critical to a large share of riders who would have limited alternatives if these services were unavailable. [10]

Alternative Trip Mode

Table 32 represents how MDOT MTA LEP and non-LEP riders would make trips if the transit were unavailable. Regarding alternative modes, across the four modes surveyed, both LEP and non-LEP passengers expressed a preference for taxi or app-based services as well as driving (rides or driving themselves).

Table 32: Alternative Trip Mode Ridership Percentages: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

Alternative Mode if MTA Unavailable	Core Bus (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)	
	LEP	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***
Would Not Make Trip	11.99%	14.83%	44.63%	7.46%	12.49%	16.99%	4.68%	14.66%	1.91%	12.76%
Bicycle	2.98%	1.77%	-	-	0.58%	0.74%	5.75%	1.74%	-	1.12%
Carpool/Vanpool	0.54%	0.11%	-	-	-	0.27%	-	-	-	-
Walk/Wheelchair	5.55%	6.75%	-	3.53%	3.71%	0.60%	20.35%	4.13%	-	6.32%
Taxi/App-Based Service (Such as Uber)	39.79%	43.95%	34.64%	3.86%	43.70%	14.20%	45.09%	50.70%	30.78%	40.34%
Driven by Someone	30.81%	24.61%	15.05%	20.67%	9.53%	11.93%	16.92%	12.67%	59.69%	24.99%
Drive Myself	8.04%	7.32%	5.68%	61.49%	29.99%	51.95%	4.51%	15.70%	7.61%	14.47%
MobilityLink	-	0.42%	-	-	N/A	0.09%	0.05%	2.69%	-	-

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

[10] In certain tables presented in this section, respondents initially selected alternative modes from a longer list of options. The responses were condensed into options reported in presented tables. As a result, in some cases, totals do not sum to 100 percent.

Fare Payment

Table 33 summarizes fare payment types across the five modes. For Light Rail and Metro Subway, the fare payment types correspond to passes only; thus, not all fare payment types are captured in this table. On MARC and Light Rail, disability fare types were purchased at a higher rate by LEP riders.[11]

Table 33: Fare Payment Type Ridership Percentages: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

Fare Payment Type[12]	Core Bus (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)	
	LEP	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***
Full Fare	95.11%	91.96%	68.96%	91.79%	89.97%	84.44%	94.68%	92.81%	97.94%	93.06%
Disability Fare	4.08%	6.48%	31.04%	2.36%	3.80%	2.50%	5.32%	4.35%	2.06%	4.71%
Student Fare	0.20%	0.52%	-	-	-	1.15%	-	-	-	0.07%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

Vehicle Access

Table 34 summarizes vehicle access across the four modes. LEP riders reported not having access to a vehicle at a higher rate than non-LEP riders on modes besides MARC and Commuter Bus. Vehicle ownership rates among LEP riders are lowest on Metro Subway and Light Rail passenger trips.

Table 34: Vehicle Access Ridership Percentages: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

Vehicle Access Status	Core Bus (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)	
	LEP	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***
Access to a vehicle	12.24%	11.61%	13.60%	76.64%	42.70%	61.62%	7.73%	18.35%	7.27%	15.71%
No access to a vehicle	87.76%	88.39%	86.40%	23.36%	57.30%	38.38%	92.27%	81.65%	92.73%	84.29%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

[11] Partly as a result of this analysis, MDOT MTA has elected to include its Reduced Fare Application for Individuals with Disabilities as a vital document (**Table 38**) to be translated into Spanish.

[12] For Light Rail and Metro Subway, these fare types refer to passes, including daily, discount, and disability passes.

Trip Origin

Table 35 summarizes the trip origin types by percentages of LEP and non-LEP riders across the modes. On trips surveyed, a majority of riders across all modes were coming from home or work. In general, LEP and non-LEP ridership percentages are fairly similar across these trip origin types, though LEP riders tend to travel more for other trip origin types compared to non-LEP riders.

Table 35: Trip Origin Ridership Percentages: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

Trip Origin Type	Core Bus (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)	
	LEP	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***
Work	26.77%	27.93%	14.24%	32.92%	12.64%	29.76%	15.52%	27.15%	29.03%	29.03%
Home	45.51%	46.39%	67.71%	57.83%	55.17%	51.76%	37.16%	49.58%	59.18%	48.30%
College/University	3.31%	1.47%	-	-	3.03%	4.20%	9.75%	0.47%	2.68%	0.73%
School (K-12)	1.39%	1.40%	-	-	3.03%	0.28%	-	0.48%	-	0.53%
Job-Related Business	5.28%	1.77%	14.24%	3.36%	1.33%	1.94%	8.30%	1.91%	1.91%	1.81%
Social Visit/Church/ Personal	5.84%	8.56%	3.81%	5.89%	9.86%	7.37%	7.56%	8.94%	-	10.13%
Shopping/Recreation/ Restaurant/Entertainment	9.58%	9.05%	-	-	8.91%	3.25%	20.66%	7.49%	7.20%	7.09%
Medical/Dental Appointment/Hospital Visit	2.32%	2.70%	-	-	-	0.26%	-	1.83%	-	1.32%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

Trip Destination

Table 36 summarizes trip destination types across the four modes. On trips surveyed, a majority of both LEP and non-LEP riders were traveling to home or work, emphasizing the crucial nature of MDOT MTA services to riders.

Table 36: Trip Destination Percentages: Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway

Trip Destination Type	Core Bus (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)	
	LEP	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***	***LEP***	***Non-LEP***
Work	28.76%	24.90%	49.88%	51.05%	29.82%	32.57%	30.41%	32.76%	32.03%	26.86%
Home	42.20%	41.32%	18.05%	42.17%	35.54%	39.61%	40.39%	39.51%	35.89%	40.36%
College/University	2.53%	1.21%	-	4.63%	3.80%	4.57%	-	0.01%	-	0.73%
School (K-12)	0.54%	1.25%	-	-	-	0.19%	-	0.76%	-	0.90%
Job-Related Business	1.77%	1.66%	8.14%	1.13%	6.63%	3.40%	8.89%	1.46%	2.31%	0.99%
Social Visit/Church/ Personal	11.58%	14.94%	-	1.03%	3.95%	9.90%	10.72%	15.16%	4.93%	17.03%
Shopping/Recreation/ Restaurant/Entertainment	10.87%	9.93%	-	-	16.48%	6.48%	2.32%	8.30%	24.85%	10.34%
Medical/Dental Appointment/Hospital Visit	1.35%	3.15%	-	-	-	0.94%	3.92%	1.21%	-	1.37%

Source: MDOT MTA Origin-Destination Rider Studies (2023-2024)

Factor 4

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Current Resources Available

MDOT MTA has a variety of resources currently available to LEP customers. These resources are described below and followed by some suggestions from front line staff for resources they believe could help them better assist LEP customers.

LanguageLine
MDOT MTA contracts with LanguageLine Solutions to provide telephonic interpretation for customers upon request. LanguageLine provides support 24 hours a day, seven days a week, 365 days a year, in 240 languages, including all languages likely to be encountered in the MDOT MTA service area. In the event of a phone call or in-person visit from an LEP constituent, MDOT MTA staff may call LanguageLine (1 (866) 874-3972). Once a customer communicates their chosen language, MDOT MTA staff initiate real-time interpretation.

Phone Customer Service in Spanish
Upon calling the MDOT MTA Transit Information customer service phone number, (410) 539-5000, customers are informed that transit information is available 24 hours online at the MDOT MTA website. In Spanish, customers are then welcomed and asked to press '2' for service in Spanish.

Website Translation
MDOT MTA uses Google Translate to provide translation of its mta.maryland.gov website into more than 100 different languages. Users requesting translation can access the site in the language needed by clicking "Translate" in the top right corner, and then choosing the language they wish to use.

Written Translation of Documents Upon Request
MDOT MTA translates documents such as schedules, guides, or notices upon request.

Interpretation for Meetings/Events
MDOT MTA contracts with an interpretation company to provide on-site language interpretation on an as-needed basis. As advertised on public meeting and hearing notices, constituents interested in interpretation should request this service within at least five days of an event. For virtual meetings, should translation be requested, online platforms offer interpretation services the agency can set up.

Volunteer Translators and Interpreters
MDOT MTA maintains a list of staff who are fluent in various languages and have volunteered to assist with translation or interpretation. The list of volunteer translators with their contact information is posted internally on MDOT MTA's intranet as a resource to be utilized when MDOT MTA staff have need of a translator.

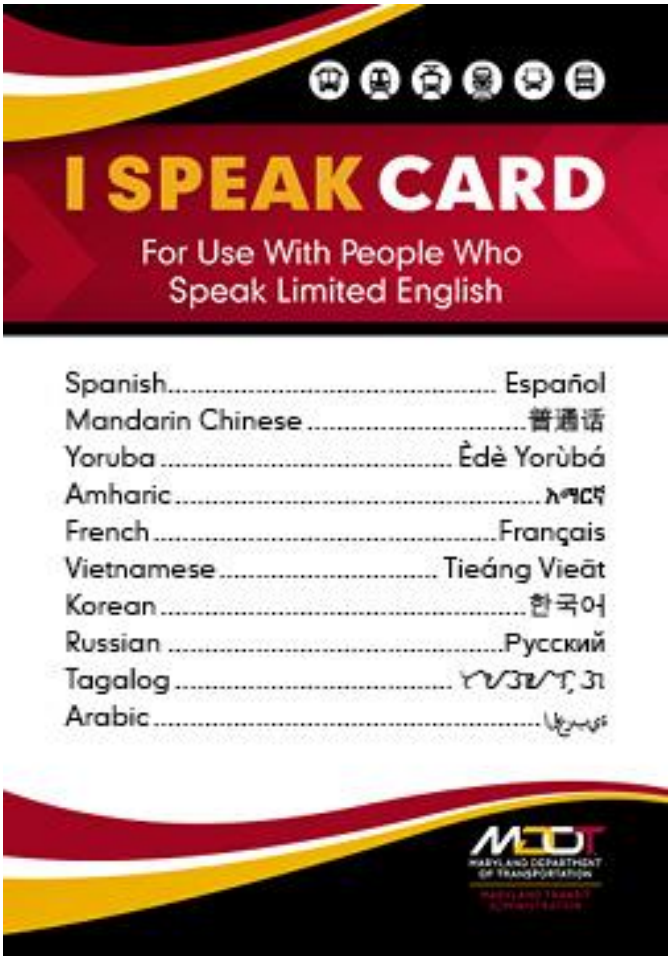
Tailored Public Participation / Outreach
As noted in the Public Participation Plan, at the outset of a public participation effort, MDOT MTA may analyze the language demographics of any affected populations. Following this analysis, public outreach materials may be translated into various languages. As noted in the Resources section of this plan, certain public outreach materials

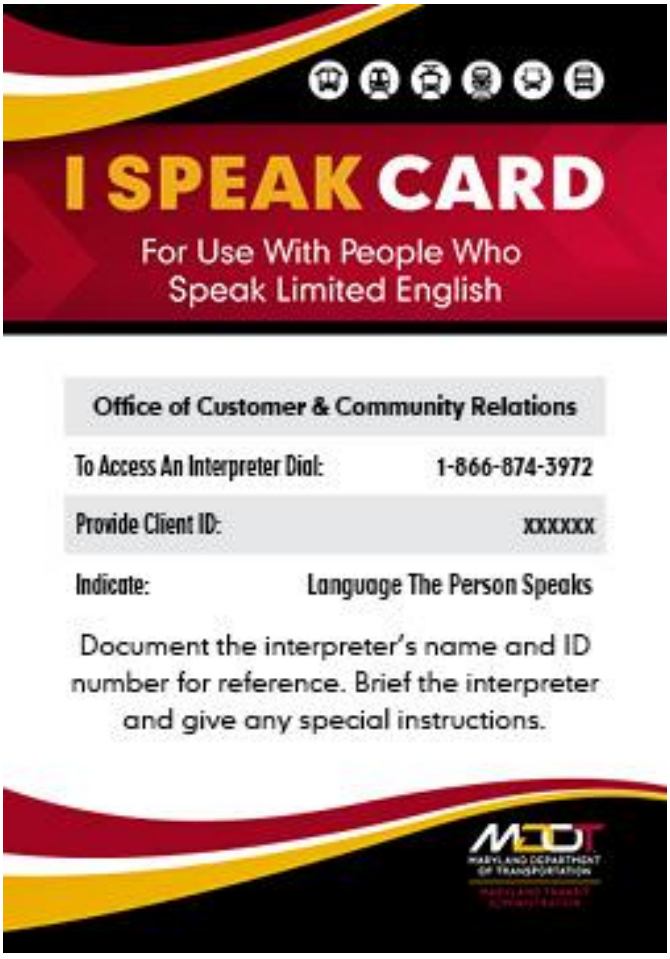
include a tagline accompanying English text to alert customers of resources available in their primary language (via LanguageLine or an in-person interpreter).

"I Speak" Cards

Using these cards (**Figure 8**), customers may point to the language they speak, at which point a representative can call LanguageLine and request service in the specified language. MDOT MTA also makes "I Speak" cards available to staff from its offices of Customer and Community Relations, Treasury, Planning & Programming, and Equal Opportunity Compliance Programs at its 6 St. Paul Street office, in the event of a walk-in customer interactions, as well as Light Rail fare inspectors and supervisors, and staff at Mobility's 4201 Patterson Ave office.

Figure 8: "I Speak" Cards





Based on data from both the Census regarding LEP persons in the MDOT MTA study area as well as the various origin-destination surveys, MDOT MTA lists the following 10 languages on its "I Speak" cards:

- Spanish
- Mandarin Chinese
- Yoruba

- Amharic
- French
- Vietnamese
- Korean
- Russian
- Tagalog
- Arabic.

Language Assistance Tear Off Sheets

MDOT MTA has produced tear off sheets that include the following sentence: “For help riding MDOT MTA services in your language, call the number below: (410) 539-5000; TTY: (410)-539-3497; Maryland Relay (711).” Tear off sheets are translated into the same ten languages identified for the “I Speak” cards, and are made available to Core Bus, Commuter Bus, and Light Rail operators, as well as MARC conductors and Metro Subway station attendant (**Figure 9**). “Tear Off Sheets” may be used by operators, station managers, or conductors to alert LEP riders that customer service is available in their language. As shown in Figure 9, staff may tear off a sheet from a pad to provide to a rider. The sheet lists a sentence explaining how to call to obtain assistance in commonly spoken languages.

Figure 9: Language Assistance Tear Off Sheets





Public Outreach Materials Tagline

The MDOT MTA tagline consists of one sentence added to selected materials used for public outreach providing notice to LEP persons about the availability of language assistance. An example of such a tagline would be: "For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below." As a rule, MDOT MTA provides this tagline in English and translates this tagline into Spanish on the outreach materials listed in **Table 37**. Depending on the results of preliminary outreach for public participation, if a community affected by outreach has a large LEP population aside from Spanish, the tagline may be translated into additional languages on outreach materials, upon MDOT MTA's determination that such would be beneficial and feasible.

Table 37: MDOT MTA Public Outreach Materials for Tagline Inclusion[13]

Public Outreach Material	Description
Print Advertisements	Published announcements notifying the public regarding MDOT MTA programs, activities, and services.
Printed Brochures	The MDOT MTA Snow Guide, Mobility Riders Guide, Transit App Brochure, CharmPass App Brochure, SmartBenefits Brochure, Safety Tips Brochure, Bike Brochure, and Visitors Guide Brochure.
Temporary Service Interruption Signage	Printed notices posted alerting riders to interruptions to MDOT MTA service availability and interruptions to the accessibility of MDOT MTA-owned stations.
Service Schedules	MDOT MTA's published documents containing timetables of revenue service and route maps.

Written Translation of Vital Documents

MDOT MTA contracts with a translation provider to provide written translations for MDOT MTA documents. MDOT MTA has adopted a policy to translate all vital documents into languages with LEP service area population percentages of at least one percent (1.00%).[14] More than 575,000 Spanish LEP speakers reside in the MDOT MTA service area. Therefore, MDOT MTA commits to translating vital documents into Spanish, the most commonly spoken language in the MDOT MTA service area, after English.

Table 38 lists documents that MDOT MTA has identified as vital documents. Where applicable, vital documents may include basic instructions on how to complete the form in English and Spanish.

[13] The materials identified in this table, as well as MDOT MTA's **vital documents**, include taglines in English and Spanish providing notice to LEP persons about the availability of language assistance.

[14] FTA notes that vital written documents include consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Examples of vital documents include an ADA complementary paratransit eligibility application, a Title VI complaint form, notice of a person's rights under Title VI, and other documents that provide access to essential services.

Table 38: MDOT MTA Vital Documents

Vital Document	Description
Title VI Notice to the Public	As noted in the General Requirements section of this Title VI Program, the Title VI Notice outlines riders' rights under Title VI of the Civil Rights Act of 1964. The notice is posted in various locations throughout the MDOT MTA system and on MDOT MTA's website.
Title VI Complaint Form and Complaint Procedures	Information on how to file a Title VI complaint, and the Title VI complaint form itself.
Title VI Brochure	A handout for community outreach events, providing a background on Title VI, including information on how to file a complaint and context regarding Limited English Proficiency (LEP) requirements.
ADA Notice / ADA Car Card	Information on how to obtain disability assistance, as well as information on how to file an ADA-related complaint.
ADA Customer Complaint Form and Complaint Procedures	The complaint form by which customers may allege discrimination or other mistreatment related to their disability.
Reduced Fare Application for Individuals with Disabilities	The application for MDOT MTA's Reduced Fare program, available to people with disabilities.
Mobility Application and Instructions	The application for Mobility, MDOT MTA's complementary paratransit service available for people with disabilities who are unable to use MDOT MTA fixed-route service.
Mobility Rider Guide	A comprehensive guide for Mobility riders on how to use the service.
Mobility Appeals Form / Hearing Request Form	Information on how to appeal eligibility for Mobility or request a hearing in this regard.
Notices of Denials, Losses, or Decreases in Benefits and Services[15]	Notices of denials, losses, or decreases in benefits and services for any relevant programs, including Reduced Fare, Mobility Paratransit Services, and Mobility Appeals.
MARC Rider Guide	A comprehensive guide for MARC riders on how to use the service.
Ticket by Mail Form	A form through which riders may request tickets for fixed-route service by mail.
Notices of Public Hearings	Notices of public hearings, which are required by Maryland law under certain conditions described in the Public Participation Plan.
Public Hearing Procedures / Comment Forms	Procedures for public hearings and comment forms, the latter of which affords interested participants the opportunity to provide feedback on proposed changes.

[15] Taglines in English and Spanish advising of language assistance will be added to all English-language notices for notices of denials, losses, or decreases in benefits and services. If the applicant/appellant requested a translated notice or requested an interpreter during an interview, all further the notices will automatically be translated into the language for which they requested translation.

Vital Document	Description
Ticket Vending Machine Instruction	For all ticket vending machines (TVM), MDOT MTA commits to provide instructions in Spanish. Due to logistical planning, this information may not become available until MDOT MTA's current TVMs are replaced, which is anticipated prior to the expiration of this program.

Staff Suggested Resources

During focus group sessions, front line staff offered a number of suggestions for tools or resources they felt would help them assist LEP customers. They are listed below:

- Bus & rail safety announcements in Spanish, especially for emergency announcements and stations with a high volume of LEP passengers
- Connected device availability for rail station attendants to use online translation services in real-time
- LanguageLine mobile app for staff use
- Increased translation support on the CharmPass app
- A standardized tracking system to measure the reach to LEP populations at events
- Refreshed volunteer interpreter program
- Increased availability of "I Speak" cards and "tear-off" sheets, as well as better clarification of how to request more of these resources
- TIC information (same as the "tear-off" sheets) posted onboard vehicles
- Multilingual signage to direct people to station managers
- Print area maps posted in stations

Language Assistance Plan Summary

MDOT MTA is committed to reducing the barriers encountered by LEP persons when accessing services and benefits. This section summarizes strategies MDOT MTA employs to accomplish this goal. MDOT MTA does not anticipate that any strategy listed in this document will be cost prohibitive in terms of resources, staff, or dollars.

Provision of Language Assistance Services by Language

As noted in the Factor 4 analysis, MDOT MTA offers various services to LEP patrons across a number of languages. LanguageLine, written translation, on-site interpretation, and MDOT MTA staff volunteer translators are available upon request in virtually any language. In addition, website translation is available into more than 100 languages.

MDOT MTA provides "I Speak" cards, language assistance tear off sheets, and public outreach materials with taglines providing notice of the availability of language assistance in Spanish. On a case-by-case basis, depending on the results of public participation analysis, taglines or other public participation materials may be translated into additional languages, upon MDOT MTA's determination that such would be beneficial and feasible. Finally, the vital documents, listed and summarized in **Table 38**, are translated into Spanish.

Notice to LEP Persons Regarding Availability of Language Assistance

MDOT MTA notifies LEP persons on the availability of language assistance through the following mechanisms:

- The agency's Title VI notice, which is translated into Spanish.
- The MDOT MTA website, where translation of the site is available. Customers may also click on a Title VI page (https://www.mta.maryland.gov/title-vi-civil-rights-act-1964), which has customer service resource links.
- Tear off sheets containing information on how to obtain language assistance, carried by transit operators, conductors, and station managers.
- Taglines in English and Spanish providing notice to LEP persons about the availability of language assistance placed on selected public outreach materials (see **Table 37**).

Monitoring, Evaluation, and Updates to Language Assistance Plan

The MDOT MTA Title VI and ADA Coordinator is responsible for monitoring, evaluating, and updating the agency's Language Assistance Plan. To monitor the program, the agency regularly assesses use of LanguageLine, requests for website translation, requests for written translation, requests for meeting interpretation, languages used in submitted feedback or comment forms, and recent origin-destination study data. The Title VI and ADA Coordinator monitors both LEP languages commonly encountered as well as manages MDOT MTA's use of resources to conduct language assistance programs.

The MDOT MTA Language Assistance Plan is updated every three years to coincide with submission of the agency's Title VI Program update. Regarding language assistance or access issues, the Title VI and ADA Coordinator maintains regular communication with the MDOT MTA Office of Customer and Community Relations, Office of Communications and Marketing, and Office of Planning and Programming. Should the results of monitoring dictate an update to the Language Assistance Plan prior to submission of the Title VI Program update, the Title VI and ADA Coordinator may propose updates to MDOT MTA staff, ultimately leading to an update of the Language Assistance Plan, if necessary.

Training on Language Access

The Title VI and ADA Coordinator is responsible for coordinating the training of MDOT MTA agency staff on how to provide timely and reasonable language assistance to LEP populations. Language assistance training is incorporated into the onboarding process for all new MDOT MTA employees. Training covers identifying language assistance needs and accessing available resources, including the identification and use of 'I Speak' cards, LanguageLine interpreter services, approved translation tools, and other available resources to facilitate effective communication with LEP riders. Employees in operations roles receive additional training through Operations training, which covers broader customer communication strategies including procedures for assisting riders with communication disabilities, such as riders who are deaf, hard of hearing, or use lip reading. Depending on the nature, length, complexity, and context of the interaction, appropriate communication methods may include written communication, non-verbal communication, or other auxiliary aids and services consistent with ADA effective communication requirements.

Beyond new employee onboarding, the Title VI and ADA Coordinator will periodically coordinate language assistance and effective communication refresher trainings with staff from the Office of Customer and Community Relations, Office of Communications and Marketing, and Office of Planning and Programming; as well as with Core Bus, Commuter Bus, and Light Rail operators; Metro Subway station managers; and MARC conductors. These trainings address the Language Assistance Plan, including LEP languages MDOT MTA most commonly encounters, and cover best practices for assisting LEP customers, including the use of LanguageLine, 'I Speak' cards, tear-off sheets, and qualified MDOT MTA staff volunteer translators, as appropriate.

State-Level LAP Requirements

Maryland House Bill 1473 (HB 1473), “State Government - Equal Access to Public Services for Individuals With Limited English Proficiency and Individuals With Disabilities” is state legislation effective October 1, 2025. The bill establishes requirements for the development, implementation, and oversight of Language Access Plans (LAPs) for Maryland state government departments, agencies, and programs. MDOT MTA must achieve compliance with state legislation on or before July 1, 2028. A summary of the state-level LAP requirements is provided in **Appendix F: State-Level LAP Requirements (HB 1473)**. The appendix includes a review of the implementation timeline, explains the relationship between the state requirements and the Language Access Plan included in the MTA Title VI Program required by the FTA, and highlights key elements that may need to be incorporated in addition to the existing Title VI Language Access Plan section.

Requirements for Fixed-Route Transit Providers

Service Area Profile

Service Types

The Maryland Transit Administration (MDOT MTA) provides five fixed-route transit services that connect Maryland's major employment and population centers: Core Bus (marketed as "CityLink," "Local Bus," and "Express Bus" service types), Commuter Bus, MARC Commuter Rail, Light Rail (marketed as "Light Rail"), and Subway (marketed as "Metro Subway"). MDOT MTA also provides paratransit service (marketed as "Mobility"). In addition to directly-operated transit service, MDOT MTA provides funding and technical assistance to subrecipients, referred to as Locally Operated Transit Systems (LOTS) in all 23 Maryland Counties, Baltimore City, Annapolis, and Ocean City.

Core Bus

Core Bus services operate primarily in the City of Baltimore and Baltimore County with limited service to Howard County and Anne Arundel County. The system, fully redesigned and rebranded as "BaltimoreLink" in 2017, consists of 66 total bus routes divided into three service types, averaging over 218,000 riders per weekday, almost 98,000 per Saturday, and almost 128,000 per Sunday:

- CityLink service consists of 12 color-coded routes that form a downtown grid and radiate out from downtown Baltimore on major streets. CityLink routes operate 24 hours a day, including frequent service (a maximum headway of 15 minutes) from 6:00 a.m. to 6:00 p.m. on weekdays on the trunk portion of each route.
- Local Bus service consists of 45 routes providing connectivity to and from urban and suburban neighborhoods and from the suburbs to Baltimore's urban core.
- Express Bus consists of eight routes designed to connect outer suburbs with downtown Baltimore and to connect key regional job centers with each other. Express Bus routes use interstate highways and arterial roads and have limited stops to provide fast service between these areas.

The Core Bus service area is defined as all Census Block Groups within one-half mile (0.5 miles) of MDOT MTA Core Bus stops. Major bus transit centers in the MDOT MTA service area include Mondawmin, UM Transit Center, City Hall, West Baltimore MARC station, Towson Center, Rogers Station and Fayette St. Plaza.

Commuter Bus

Primarily operating from outlying counties, Commuter Bus serves commuters bound for Baltimore, Washington, DC, and various additional Central Maryland destinations. Commuter Bus operates primarily on weekdays only, during peak travel times, and to peak travel destinations. The exception to this is Route 201, which operates between Gaithersburg and BWI Airport, seven days per week, 365 days per year.

There are 36 Commuter Bus routes operated among six contractors under multi-year contracts, with average weekday ridership on the combined routes of about 7,800. Commuter Bus travel is approximately split as follows:

- Baltimore-bound routes (eight): twenty-two percent (22%) of Commuter Bus routes.
- Central Maryland-bound Intercounty Connector (ICC) routes (four): eleven percent (11%) of Commuter Bus routes.
- Washington, DC-bound routes (24): sixty-seven percent (67%) of Commuter Bus routes.

The Commuter Bus service area is defined as all Census Block Groups within three miles of stops, excluding stops where morning boarding is not possible.

MARC Commuter Rail

MARC is a commuter rail system serving the Washington, DC and Baltimore metropolitan areas. MARC operates a mix of peak-period only commuter service and all-day service with all lines terminating at Washington's Union Station. Three rail lines serve a total of 42 stations in Maryland, Washington DC, and West Virginia. The MARC Commuter Rail service area is defined as all Census Block Groups within three miles of MARC stations. MARC is operated by contractors. Each of the three lines have their own unique operating characteristics:

- Penn Line: The Penn Line is the busiest of the three MARC lines. All trains operate between Washington Union Station and Baltimore Penn Station, with some trips extending to Perryville, Maryland. The Penn Line represents the bulk of MARC ridership (approximately 15,900 weekday, 6,000 Saturday, and 2,900 Sunday riders), and is the only line to operate all day service in both directions and to provide weekend service between Baltimore and Washington, DC, which commenced in the fall of 2013.
- Camden Line: The shortest MARC line, the Camden Line, accounts for the lowest ridership of the three MARC services with approximately 2,800 average weekday passengers. Camden Line trains operate from Baltimore's Camden Station to Washington's Union Station along an alignment farther west than the parallel Penn Line. Camden Line trains run eastbound toward Baltimore during the morning peak period, and westbound toward Washington, DC during the afternoon peak period.
- Brunswick Line: The Brunswick Line features two branches, one of which serves the City of Frederick, Maryland, and the second which travels to Martinsburg, West Virginia. Trains on the Brunswick Line operate during weekday peak periods only, serving about 4,000 daily riders. All morning trains operate inbound to Washington's Union Station; all afternoon trains operate outbound to Martinsburg or Frederick.

Light Rail

Light Rail consists of a 30-mile north-south light rail line that spans part of Baltimore County, the entire length of the City of Baltimore, and part of Anne Arundel County. There are three service patterns providing Light Rail service to 33 stations: Hunt Valley to BWI Airport; Hunt Valley to Cromwell Station/Glen Burnie; and Penn Station to Camden Yards. Light Rail averages over 16,300 riders per weekday, nearly 10,500 riders per Saturday, and over 6,500 riders per Sunday. The Light Rail service area is defined as all Census Block Groups within three-quarters of a mile (0.75 miles) of Light Rail stations.

Metro Subway

Metro Subway is a 15.5-mile, 14-station heavy rail rapid transit line that connects Johns Hopkins Hospital and Owings Mills (Baltimore County) via Baltimore City. Metro Subway operates frequent all-day service during both weekdays and weekends, with additional service during peak periods. Metro Subway averages almost 14,300 riders each weekday, about 10,000 riders on Saturdays and about 10,000 riders Sundays. The Metro Subway service area is defined as all Census Block Groups within three-quarters of a mile (0.75 miles) of Metro Subway stations.

Fare Information

Core Bus, Light Rail, and Metro Subway

Table 39 summarizes MDOT MTA's current regular fare options and prices, available on the Core Bus, Light Rail, and Metro Subway services. Depending on the fare media, MDOT MTA offers riders various payment options. Single trips, as well as day, weekly, and monthly passes are available. Passengers may purchase fares on the CharmCard, a rechargeable smart fare card that can be used on transit systems across the Baltimore-Washington region, including for transfers to services in Washington, DC, Northern Virginia, and Montgomery and Prince George's Counties.

Passengers may also purchase fares for all modes using the CharmPass app, available on Apple and Android mobile devices. When using this option, riders may transfer between Core Bus, Light Rail, and Metro Subway for no additional cost within 90 minutes. For passengers who may not be commuting every day, MTA now also offers the CharmFlex 3-day and 10-day fare option on local service for about fifteen percent (15.00%) less than the cost of a day-pass. It is available only on the CharmPass app. CharmFlex fares do not have to be used on consecutive days.

Table 39: MDOT MTA Core Bus, Light Rail, and Metro Subway Fare Options

Fares and Passes	Full Fare	Senior/Disability	Student	Mobility
One-way	$2.00	$1.00	$1.50	$2.20
Day Pass / 1-Day Pass	$4.60	$2.30	--	--
Weekly / 7-Day Pass	$22.00	--	--	--
Monthly / 31-Day Pass	$77.00	$23.00	--	--
CharmFlex / 3-Pack	$11.70	--	--	--
CharmFlex / 10-Pack	$39.10	--	--	--
All Access College Transit Pass	--	--	$57.00	--
Mobility 20-Trip Book	--	--	--	$44.00

Source: MDOT MTA

Commuter Bus

Current MDOT MTA Commuter Bus fares are listed in **Table 40**. Commuter Bus uses a zone-based system for its fare structure, with fares increasing with travel distance.

Table 40: MDOT MTA Commuter Bus Fare Options

Fares and Passes	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5
One-Way / Full Fare	$4.00	$5.00	$6.00	$7.00	$8.00
One-Way / Senior/Disability	$3.00	$4.00	$5.00	$6.00	$7.00
10-Trip / Full Fare	$40.00	$50.00	$60.00	$70.00	$80.00
10-Trip / Senior/Disability	$30.00	$40.00	$50.00	$60.00	$70.00
Monthly / Full Fare	$136.00	$170.00	$204.00	$238.00	$272.00
Monthly / Senior/Disability	$102.00	$136.00	$170.00	$204.00	$238.00
Transit Link Card	*** Transit Link will increase same as monthly ($34 additional / month) ***				

Source: MDOT MTA

MARC Commuter Rail

MARC fares are distance-based; current one-way fares range from:

- Penn Line: $6.00-$13.00.
- Camden Line: $6.00-$9.00.
- Brunswick Line: $6.00-$14.00.

The system offers several types of fare media, including one-way; five-day weekly; seven-day weekly; monthly; senior; student; and Transit Link Card, which can be used on the WMATA Metrorail for one calendar month. Tickets purchased on trains are subject to a $5.00 surcharge if the ticket vending machine was available and/or the ticket office was open at train departure time. The $5.00 surcharge applies to all passengers except senior and certified disability fares.

Service Area Maps

Using Census Block Groups from the 2019-2023 Five-Year American Community Survey (ACS), the maps in this section present a physical and demographic profile of the MDOT MTA service area. Additional map sources include Census TIGER/Line files and files provided by MDOT MTA, including service data for the Spring 2025 pick.

Methodology

MDOT MTA Mode Service Areas

MDOT MTA currently provides five fixed-route transit modes. The MDOT MTA service area has therefore been split into the five current service areas by mode. **Table 41** summarizes service area definitions for the MDOT MTA modes. Individual maps shown by mode in this section use the extent of the five fixed-route mode definitions listed below.

Table 41: MDOT MTA Service Area Definitions

Mode	Service Area Definition
Core Bus	All Census Block Groups within 0.5 miles of Core Bus stops.
Commuter Bus	All Census Block Groups within three miles of Commuter Bus stops, excluding stops where morning boarding is not possible.
MARC Commuter Rail	All Census Block Groups within three miles of MARC stations.
Light Rail	All Census Block Groups within 0.75 miles of Light Rail stations.
Metro Subway	All Census Block Groups within 0.75 miles of Metro Subway stations.

Source: MDOT MTA

Minority Population

The minority population of MDOT MTA individual service areas is defined as the total population identifying as a race other than White and/or Hispanic. The percentage minority population within each service area is defined as the minority population divided by the total population.

Low-Income Population[16]

Thresholds for "low-income" were set separately for each MDOT MTA mode service area using the following data sources: American Community Survey 2019-2023 Five-Year estimates for household size and poverty status; U.S. Housing and Urban Development (HUD) FY2022 median family income limits summary; and U.S. Dept. Of Health and Human Services federal poverty guidelines. The methodology for calculating the low-income population in the MDOT MTA service area is as follows: first, the average household size within the service area of each mode was determined and rounded to the nearest whole number. Second, to determine which poverty level most closely aligns with the local definition of low income for each mode, the average rounded household size was referenced against area median family income for the "very low (fifty percent (50%))" income limits within the Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA). Third, income limits for each mode were then referenced to the federal poverty limits for the service area's average household size at the corresponding federal poverty guideline multiple rounded to the nearest income division (break point) identified in U.S. Census Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months" By MDOT MTA mode, this process yielded the following definitions of what constitutes a low-income household:

- Core Bus: Less than or equal to $49,999 household income.
- Commuter Bus: Less than or equal to $59,999 household income.
- MARC Commuter Rail: Less than or equal to $59,999 household income.
- Light Rail: Less than or equal to $49,999 household income.
- Metro Subway: Less than or equal to 49,999 household income

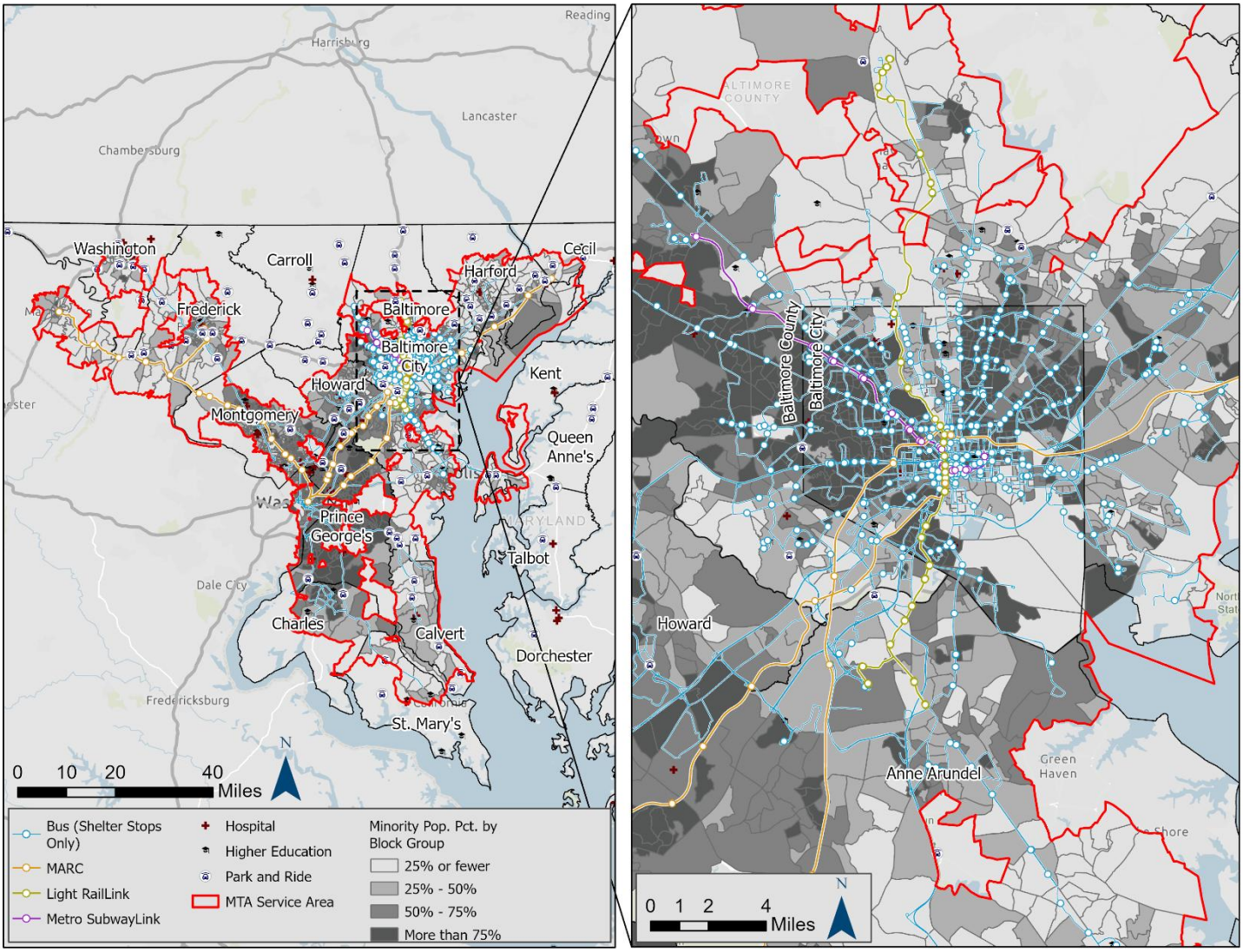
The low-income percentage for a mode's service area is calculated by dividing the population of the service area living in poverty at the defined interval (200% for Core Bus, Commuter Bus, MARC, Light Rail, and Subway) divided by the population of the service area.

[16]MDOT MTA refined its low-income definition to incorporate U.S. Dept. Of Health and Human Services poverty status determinations as detailed in Census Table C17002: "Ratio of Income to Poverty Level in the Past 12 Months" to more accurately capture individuals living in households at or below regional determinations for very low-income for the Baltimore-Columbia-Towson, MD Metropolitan Statistical area.

Minority Population: Entire MDOT MTA Service Area

Figure 10 shows MDOT MTA's service area, which spans portions of Maryland, Virginia, West Virginia, and Washington, DC.[17] Transit routes, stops, and Park & Ride locations are shown. In this map, Census Block Groups are symbolized to show the percentage of individuals identifying as non-White and/or Hispanic. Block Groups with relatively higher minority population percentages are primarily located in the Baltimore City, Washington, DC, Montgomery County, and southern Maryland regions.

Figure 10: MDOT MTA Service Area and Percent Minority by Block Group



[17] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Transit and Capital Projects: Entire MDOT MTA Service Area

Based primarily on Cornerstone plans released for each transit mode, **Table 42** provides a brief summary of each of the projects that's currently available within MTA website.

Table 42: Upcoming Maryland Regional Transit and Capital Projects

Project Name	Description	Mode	Timeline
Light Rail Modernization Program	The LRMP is a more than $1 billion program of investments in light rail vehicles, signal systems, stations, track, and maintenance facilities for Baltimore's Central Light Rail Line.	Light Rail	Short and Medium Term (2025-2034)
MARC Growth and Transformation Plan	This long-range plan synthesizes MTA plans, policies, and reports with performance data, local and national trends, and public and stakeholder input.	MARC	Short Term (2023-2024)
Mondawmin Transit Hub Plan	The Mondawmin Transit Hub project is a $33.5 million multi-modal transportation enhancement project that will perform safety, accessibility, state of good repair, and sustainability improvements at this vital transit hub in West Baltimore.	Multiple	Short Term (2024-2025)
BMORE BUS Plan	A transit plan that presents the agency's vision for improved bus service in the Baltimore region.	Core Bus	Short Term (2024-2025)
Penn-Camden Connector Plan	The PCC would revitalize a historic rail alignment in the region and would be used by predominantly MARC passenger trains. The multi-faceted project would enhance rail connectivity and boost efficiency for passenger rail service in the region.	MARC	Short Term (2024-2026)
Purple Line	A 16.2 -mile Light Rail line under construction to link the suburbs of Bethesda, Silver Spring, College Park, and New Carrollton.	Light Rail[18]	Short Term (2023–2026)
Red Line	The Red Line will be a high-frequency, high-capacity line for the Baltimore Region, and will be an investment in residents' access to jobs, education, services, and opportunities.	To Be Determined	
Patapsco Station Pedestrian Access	An access project meant to better connect Patapsco Station, a major Light Rail and bus hub, to the surrounding communities.	Light Rail	Short Term (2023–2025)
Howard Street Corridor Improvements	Howard Street's embedded tracks are in need of replacement. MDOT MTA is exploring the possibility of realigning this track to improve safety.	Light Rail	Short Term (2023–2027)

[18] As of publication, while the Purple Line will be a Light Rail line within the MDOT MTA system, it will not be part of the Light Rail system.

Project Name	Description	Mode	Timeline
Eastern Bus Division Reconstruction	MDOT MTA is rebuilding the Eastern Bus Division to support an entirely electric fleet. This project will improve and retrofit division's 80-year-old Ponca Street depot, providing additional vehicle storage, new employee amenities, and vehicle charging capability.	Core Bus	Short and Medium Term (2023–2030; Pilot launching in 2023)
Transit Hubs Initiative	MTA is pursuing a community-driven and data-driven approach to identify opportunities to improve the customer experience, make transfers easier between bus routes and at rail stations, and improve multimodal connections.	Multiple	Ongoing
Brunswick Yard Storage Facility	MDOT MTA is looking to acquire the Brunswick Yard facility from CSX to expand storage capacity at the site.	MARC	Ongoing
Wabash Facility Rehabilitation	The Wabash maintenance facility is undergoing internal rehabilitation which includes replacement of maintenance equipment and building infrastructure improvements. It will also need to be retrofitted to be able to service the new Metro Subway vehicles, which require roof access.	Metro Subway	Ongoing
Bus Transit Priority Infrastructure	MDOT MTA is pursuing multiple projects to increase bus reliability, speed, and passenger safety on the BaltimoreLink system. Curb extensions, transit signal priority, bus lanes, queue jumps, and other measures are planned or currently implemented as part of several projects: • Charles & Light Street Bus Lane Pilot • Harford Avenue Bus Lane Pilot • York Road Bus Lane Pilot • Garrison Boulevard Transit Priority Initiative • Belair Road/Gay Street Corridor	Core Bus	Ongoing
RAISE Baltimore Transit Priority Project	The RAISE project will enhance MDOT MTA's CityLink Blue and CityLink Orange bus lines to provide faster, more reliable transit and improved pedestrian safety along a 20-mile corridor in Baltimore County and Baltimore City. Proposed improvements include dedicated bus lanes, transit signal priority, ADA improvements, and electric vehicle charging stations.	Core Bus	Short Term (2022–2027)

Project Name	Description	Mode	Timeline
Fast Forward Customer Experience Enhancement Program	This is a wide-ranging effort focused on improving transit reliability, travel times and customer safety and access. Projects include: more dedicated bus lanes; transit signal prioritization; new and enhanced transit hubs; more bus shelters; ADA and pedestrian safety improvements near bus stops; real-time information signage; and enhanced wayfinding along Light Rail routes.	Multiple	Ongoing
Fare Collection System Replacement and Modernization	This project will overhaul MDOT MTA's fare collection systems, providing stored value capability, enabling fare capping, allowing additional payment options, and supporting all-door bus boarding.	Multiple	Short Term (2023–2025)
Regional Transit Plan Corridor Studies	This includes studies of the North-South Corridor and East-West Corridor, two potential transit corridors identified in the Regional Transit Plan for Central Maryland. The studies will assess existing land use and travel patterns to make recommendations about transit modes, alignments, and infrastructure for each corridor.	Multiple	Funded for planning only (ongoing)
Southern Maryland Rapid Transit	This project includes a rapid transit system serving the rapidly growing MD 5/US 301 corridor. The completed Southern Maryland Rapid Transit Study considered two transit modes for the corridor, Bus Rapid Transit and Light Rail Transit.	Multiple	Funded for planning only
Zero Emission Bus Transition	In accordance with the Maryland Zero Emission Bus Transition Act, MTA submits an Annual Report detailing the Administration's progress during the past year towards achieving zero-emissions fleet conversion goals, including an analysis of potential carbon emissions reduction and capital and operating expenses that will result from the conversion, as compared to the Administration continuing to purchase, operate, and maintain diesel buses.	Core Bus	Ongoing
Baltimore Penn Station Multimodal Access Improvements	This project will provide multi-modal access improvements to Baltimore Penn Station, including transit priority treatments for high-volume bus corridors, bus lanes to connect to planned North Avenue improvements, bus stop amenities, and bicycle and pedestrian improvements. These improvements will support future ridership needs and improvement station accessibility.	Multiple	Short Term (2022–2026)

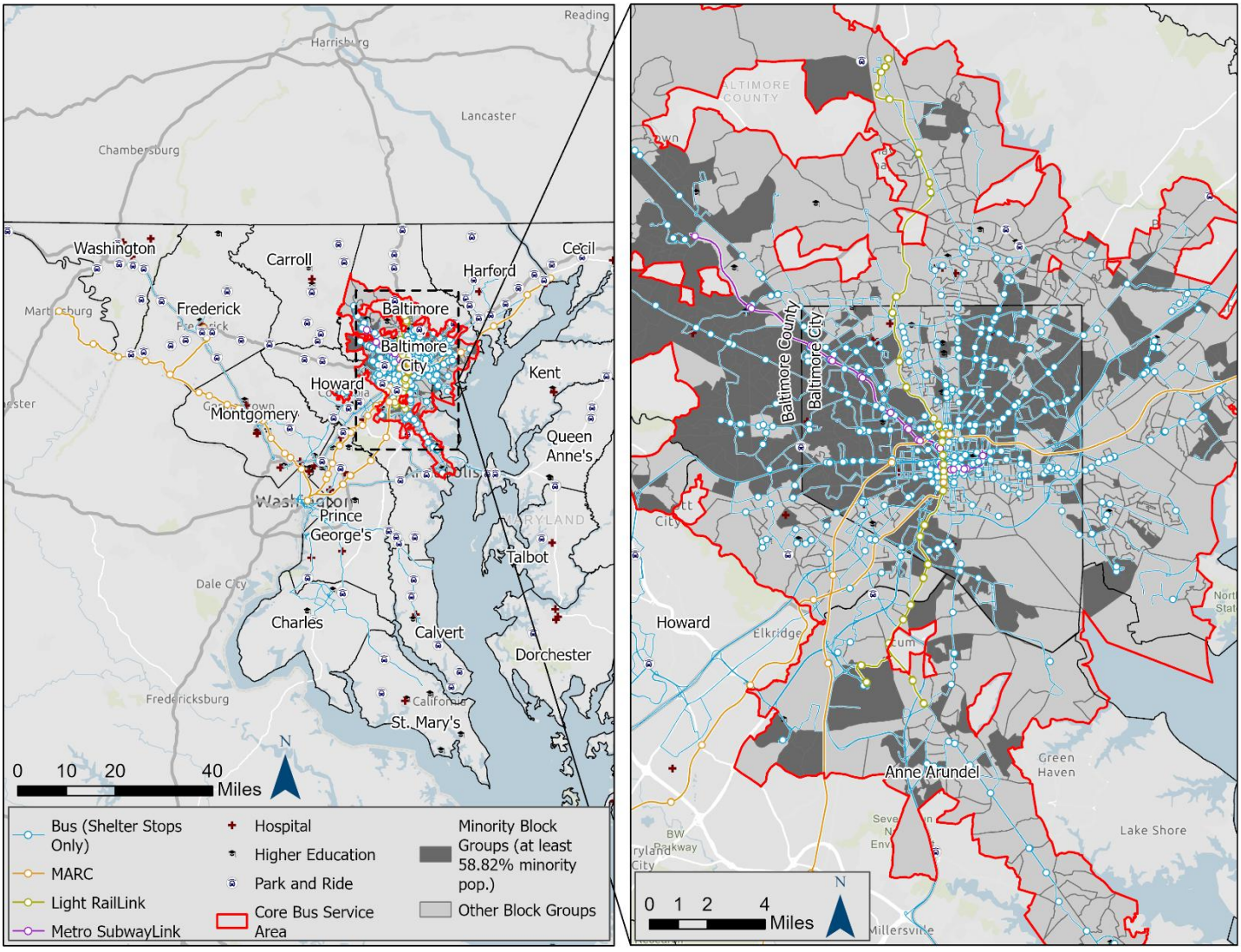
Source: MDOT MTA

Core Bus Service Area Maps

Minority Block Groups

Figure 11 shows the distribution of minority Block Groups across the Core Bus service area.[19] Within the Core Bus service area, a minority Block Group is defined as one with a minority population percentage greater than or equal to the minority population percentage for the Core Bus service area, or nearly fifty-nine percent (58.82%). The concentration of minority Block Groups in the Core Bus service area is highest in the northeast and northwest corridors of Baltimore City, as well as downtown.

Figure 11: Core Bus Service Area: Distribution of Minority Block Groups

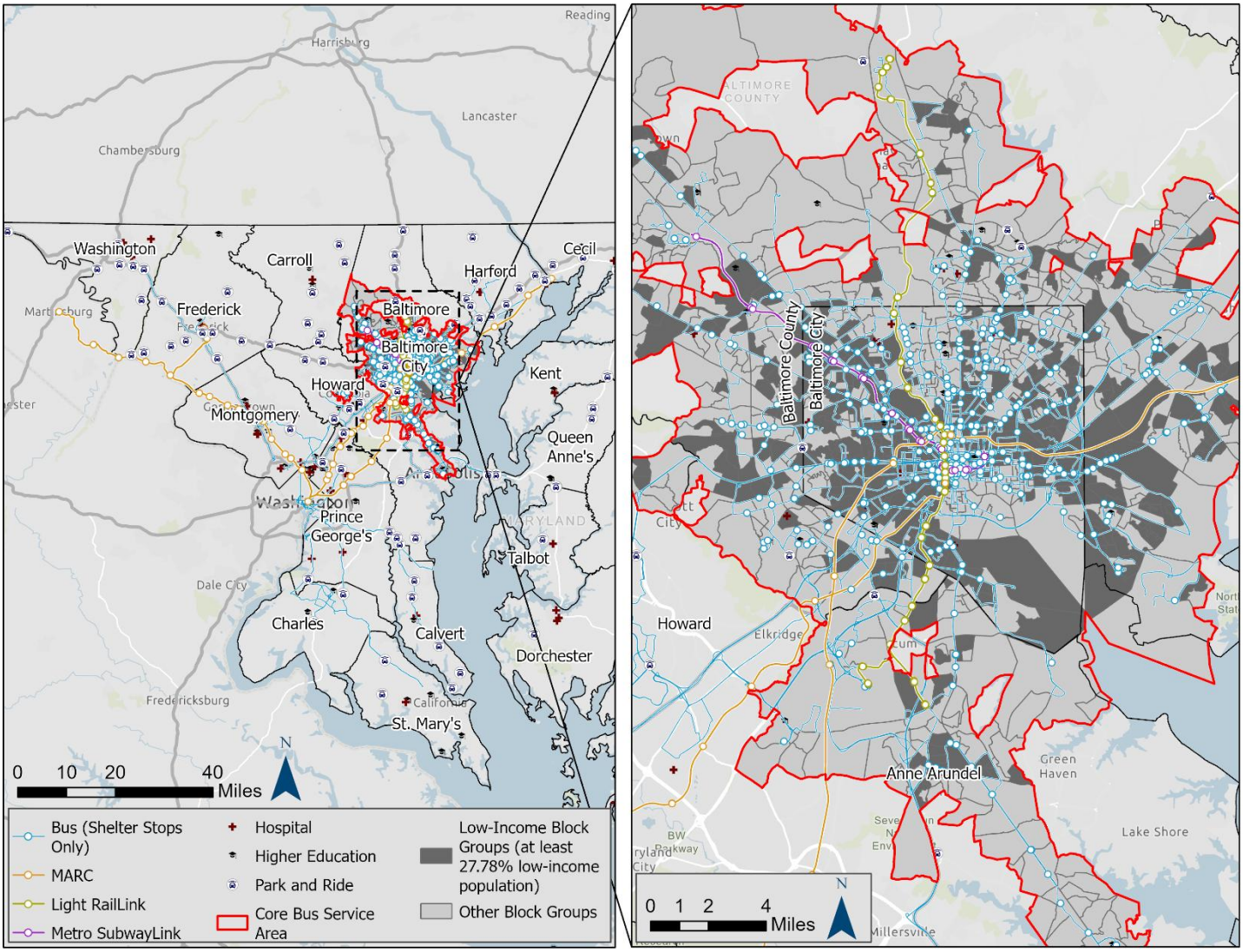


[19] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Low-Income Block Groups

Figure 12 shows the distribution of low-income Block Groups across the Core Bus service area.[20] Within the Core Bus service area, a low-income Block Group is defined as one with a low-income population percentage greater than or equal to nearly twenty-eight percent (27.78%). The concentration of low-income Block Groups in the Core Bus service area is highest in central Baltimore City.

Figure 12: Core Bus Service Area: Distribution of Low-Income Block Groups



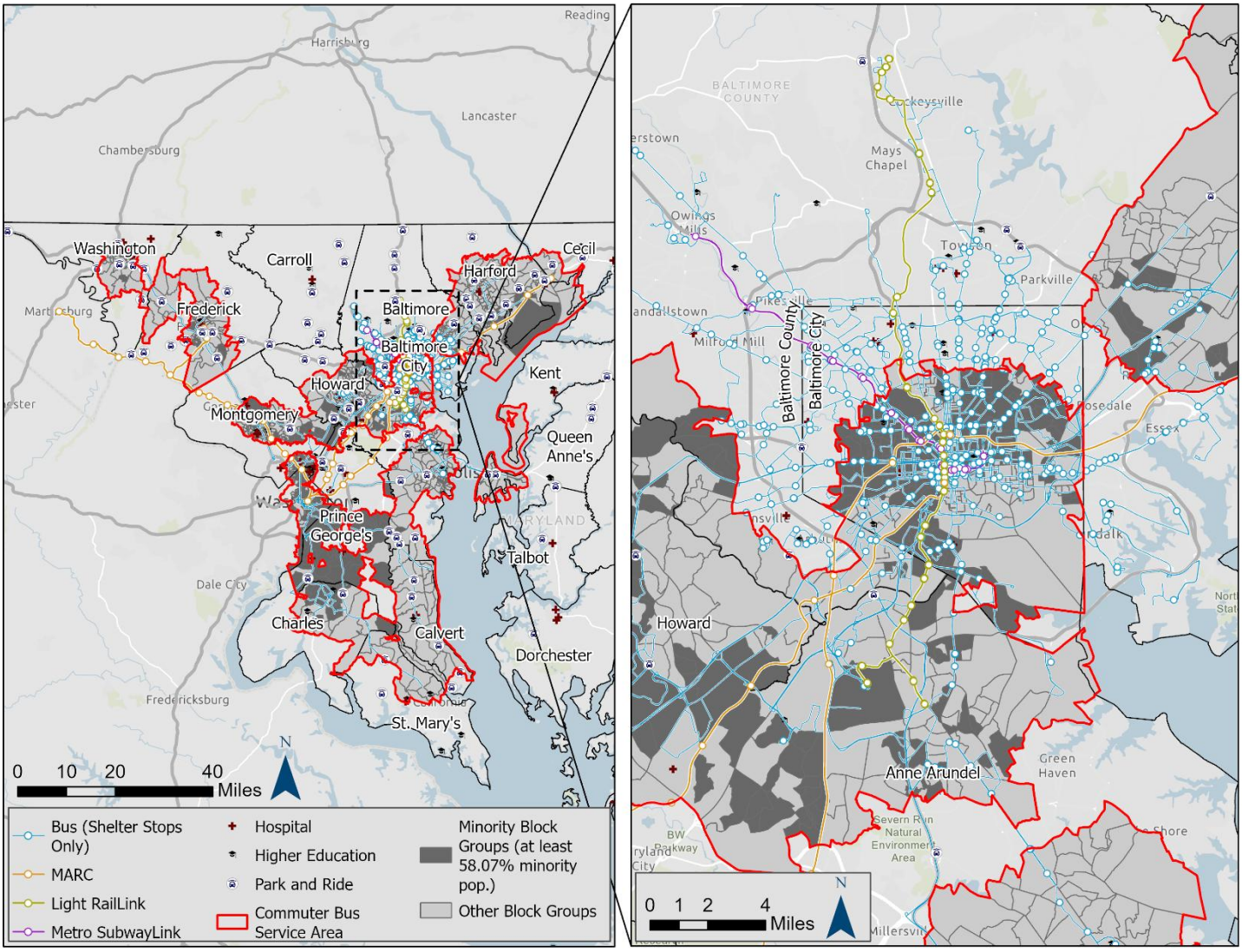
[20] Source: American Community Survey Five-Year Estimates, 2019-2023, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months

Commuter Bus Service Area Maps

Minority Block Groups

Figure 13 shows the distribution of minority Block Groups across the Commuter Bus service area.[21] Within the Commuter Bus service area, a minority Block Group is defined as one with a minority population percentage greater than or equal to the minority population percentage for the Commuter Bus service area, or fifty-eight percent (58.07 %). The concentration of minority Block Groups in the Commuter Bus service area is highest in Baltimore City and portions of southern Maryland.

Figure 13: Commuter Bus Service Area: Distribution of Minority Block Groups

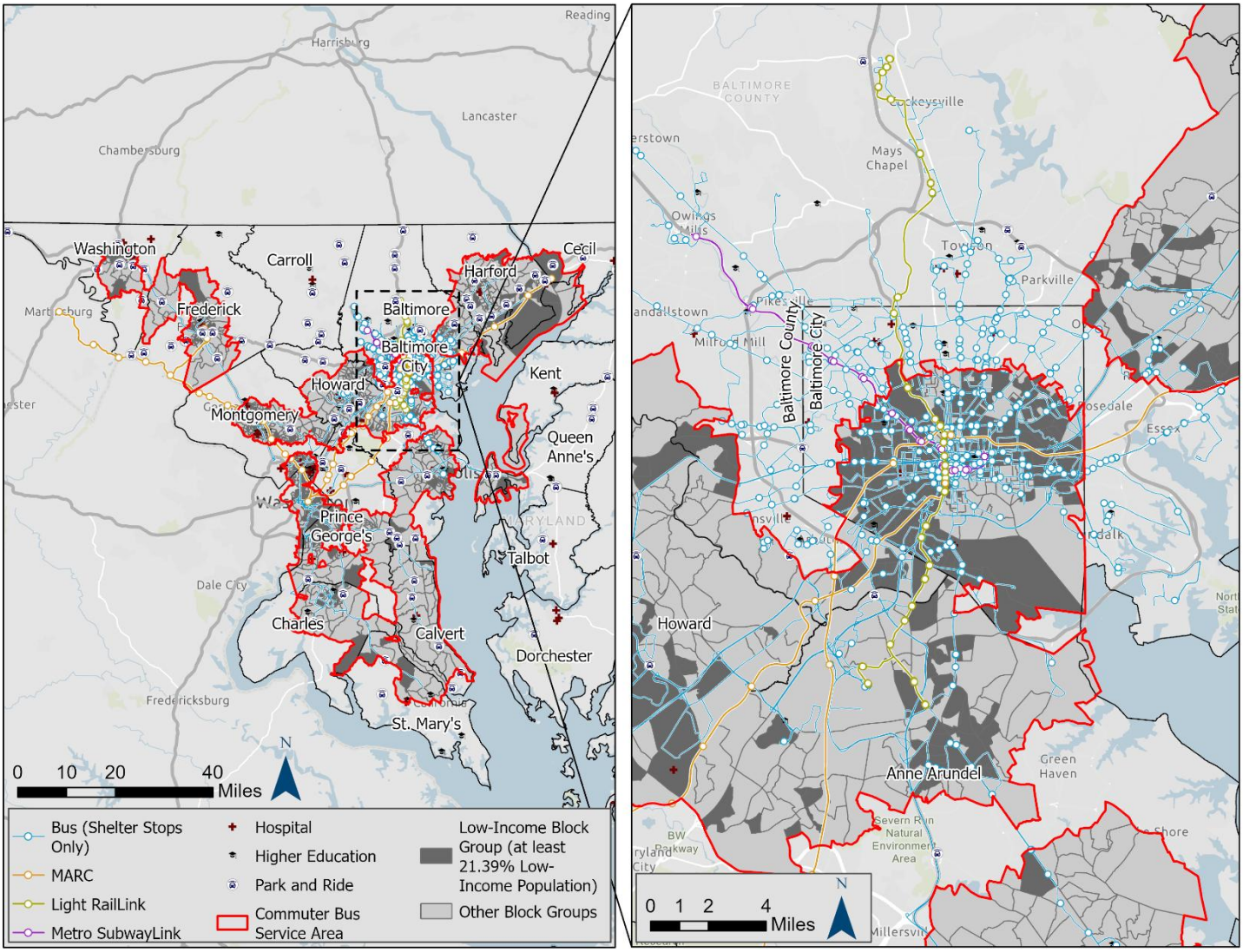


[21] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Low-Income Block Groups

Figure 14 shows the distribution of low-income Block Groups across the Commuter Bus service area.[22] Within the Commuter Bus service area, a low-income Block Group is defined as one with a low-income population greater than or equal to over twenty-one percent (21.39%). The concentration of low-income Block Groups in the Commuter Bus service area is highest across swaths of Baltimore City, the Washington, DC region, and portions of southern Maryland.

Figure 14: Commuter Bus Service Area: Distribution of Low-Income Block Groups



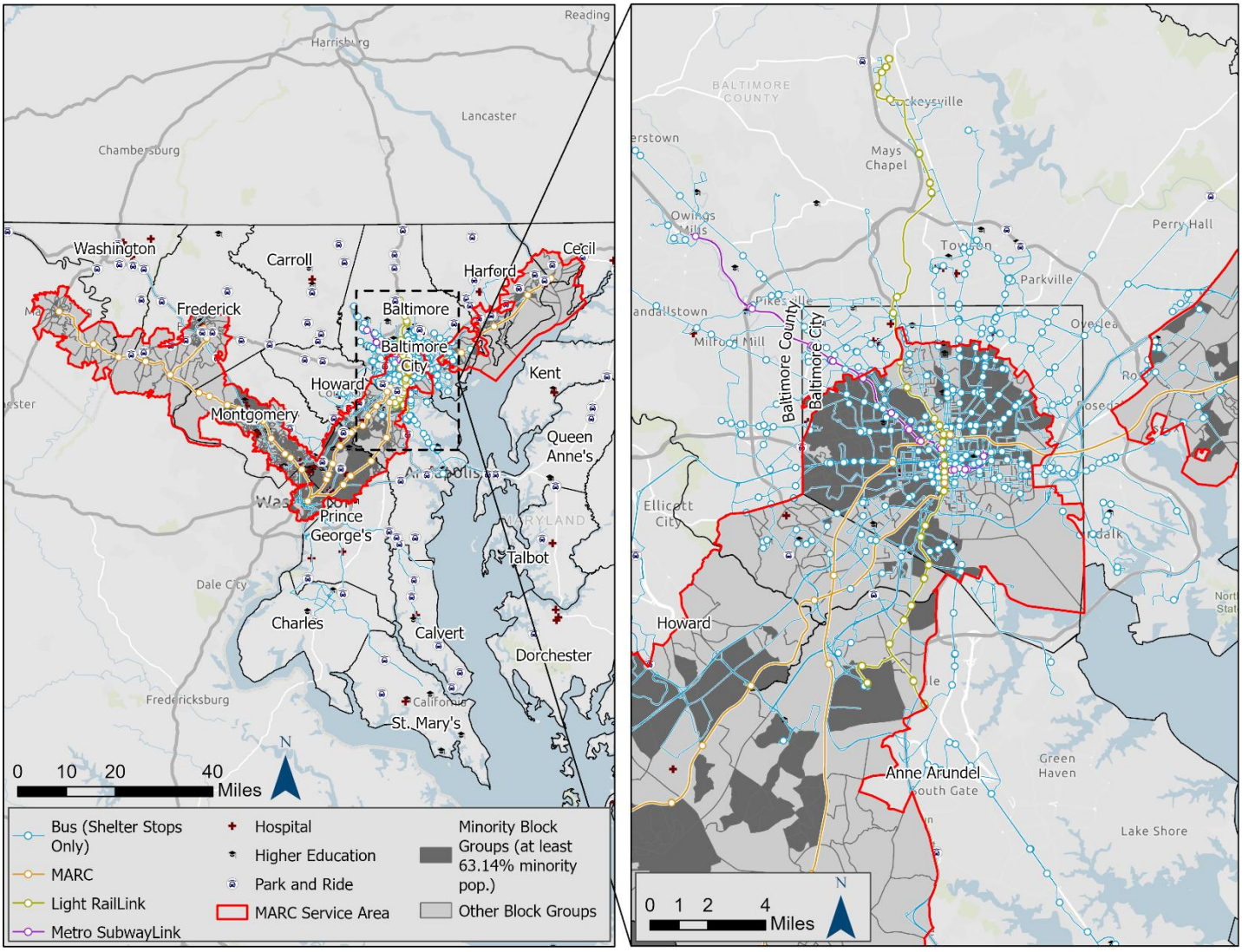
[22] Source: American Community Survey Five-Year Estimates, 2019-2023, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months

MARC Commuter Rail Service Area Maps

Minority Block Groups

Figure 15 shows the distribution of minority Block Groups across the MARC Commuter Rail service area.[23] Within the MARC Commuter Rail service area, a minority Block Group is defined as one with a minority population percentage greater than or equal to the population percentage for the MARC Commuter Rail service area, or sixty-three percent (63.14%). The concentration of minority Block Groups in the MARC service area is highest in Baltimore City, Montgomery County, and east of Baltimore City, particularly around Edgewood Station.

Figure 15: MARC Service Area: Distribution of Minority Block Groups

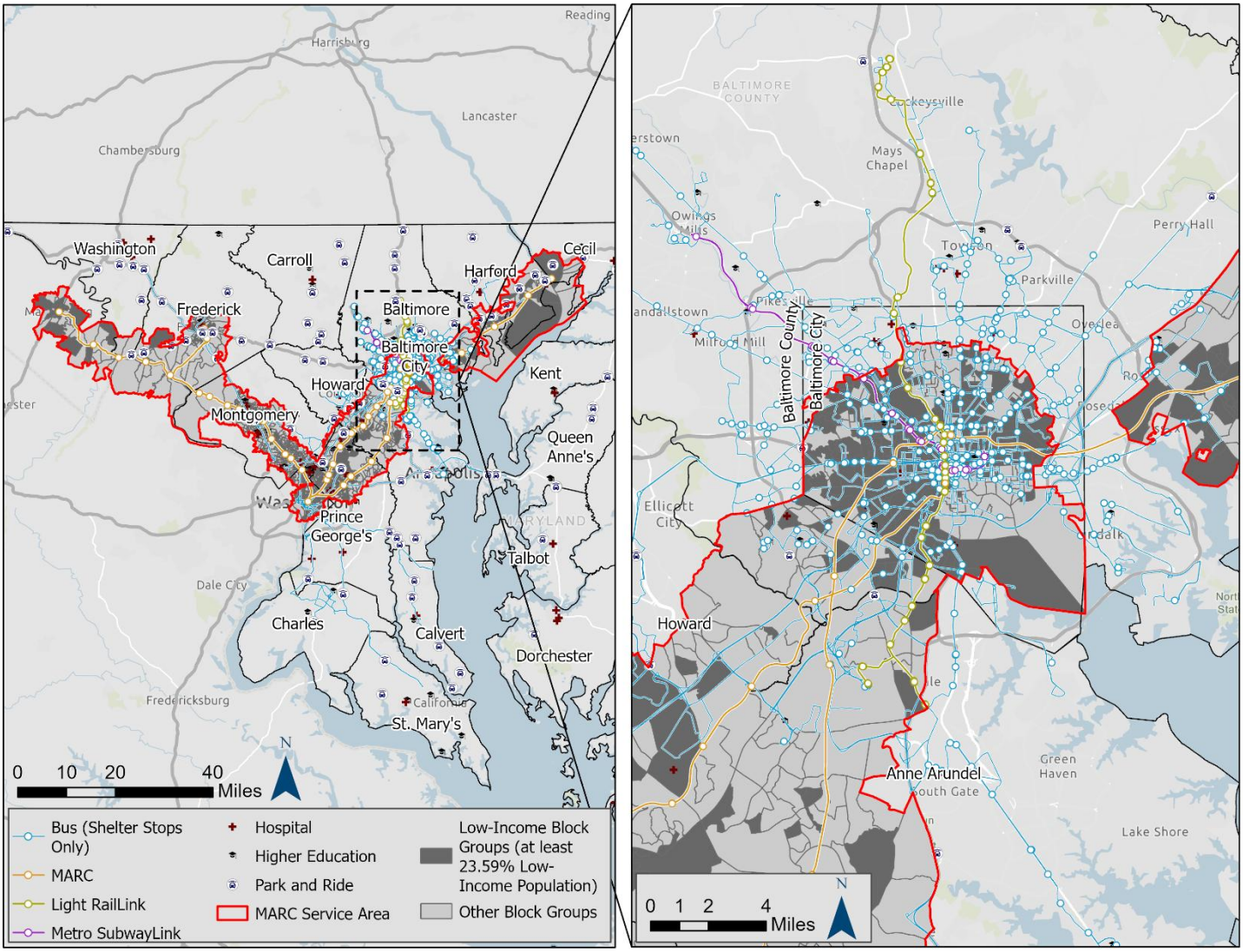


[23] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Low-Income Block Groups

Figure 16 shows the distribution of low-income Block Groups across the MARC Commuter Rail service area.[24] Within the MARC Commuter Rail service area, a low-income Block Group is defined as one with a low-income population percentage greater than or equal to over twenty-three percent (23.59%). The concentration of low-income Block Groups in the MARC service area is highest in Baltimore City, the Washington, DC region, portions of southern Maryland, and around Edgewood Station.

Figure 16: MARC Service Area: Distribution of Low-Income Block Groups



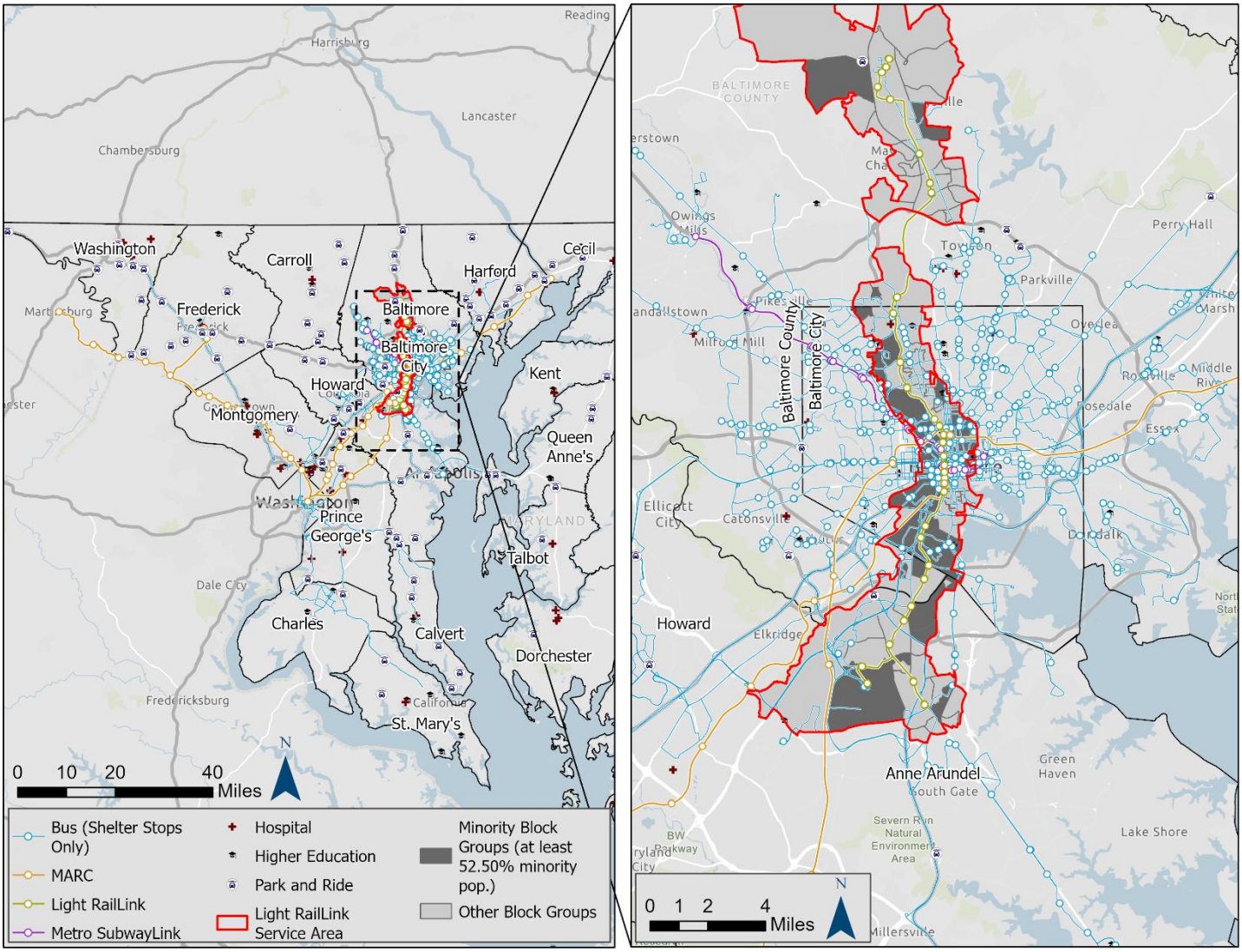
[24] Source: American Community Survey Five-Year Estimates, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months

Light Rail Service Area Maps

Minority Block Groups

Figure 17 shows the distribution of minority Block Groups across the Light Rail service area.[25] Within the Light Rail service area, a minority Block Group is defined as one with a minority population percentage greater than or equal to the population percentage in the Light Rail service area, or nearly fifty-three percent (52.50 %). The concentration of minority Block Groups in the Light Rail service area is highest around BWI Airport and central Baltimore City.

Figure 17: Light Rail Service Area: Distribution of Minority Block Groups

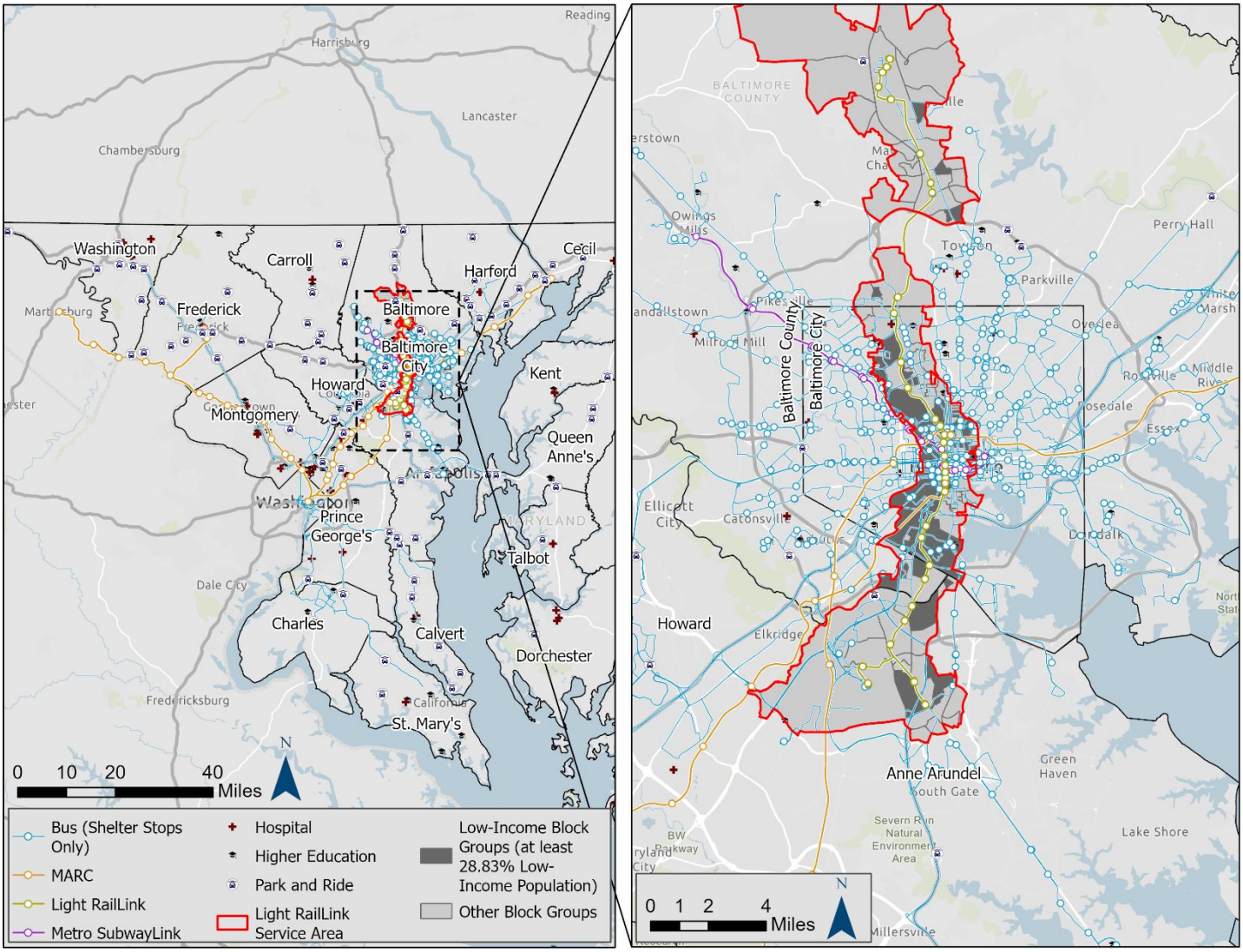


[25] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Low-Income Block Groups

Figure 18 shows the distribution of low-income Block Groups across the Light Rail service area.[26] Within the Light Rail service area, a low-income Block Group is defined as one with a low-income population percentage greater than or equal to nearly twenty-nine percent (28.83%). The concentration of low-income Block Groups in the Light Rail service area is highest in central Baltimore City.

Figure 18: Light Rail Service Area: Distribution of Low-Income Block Groups



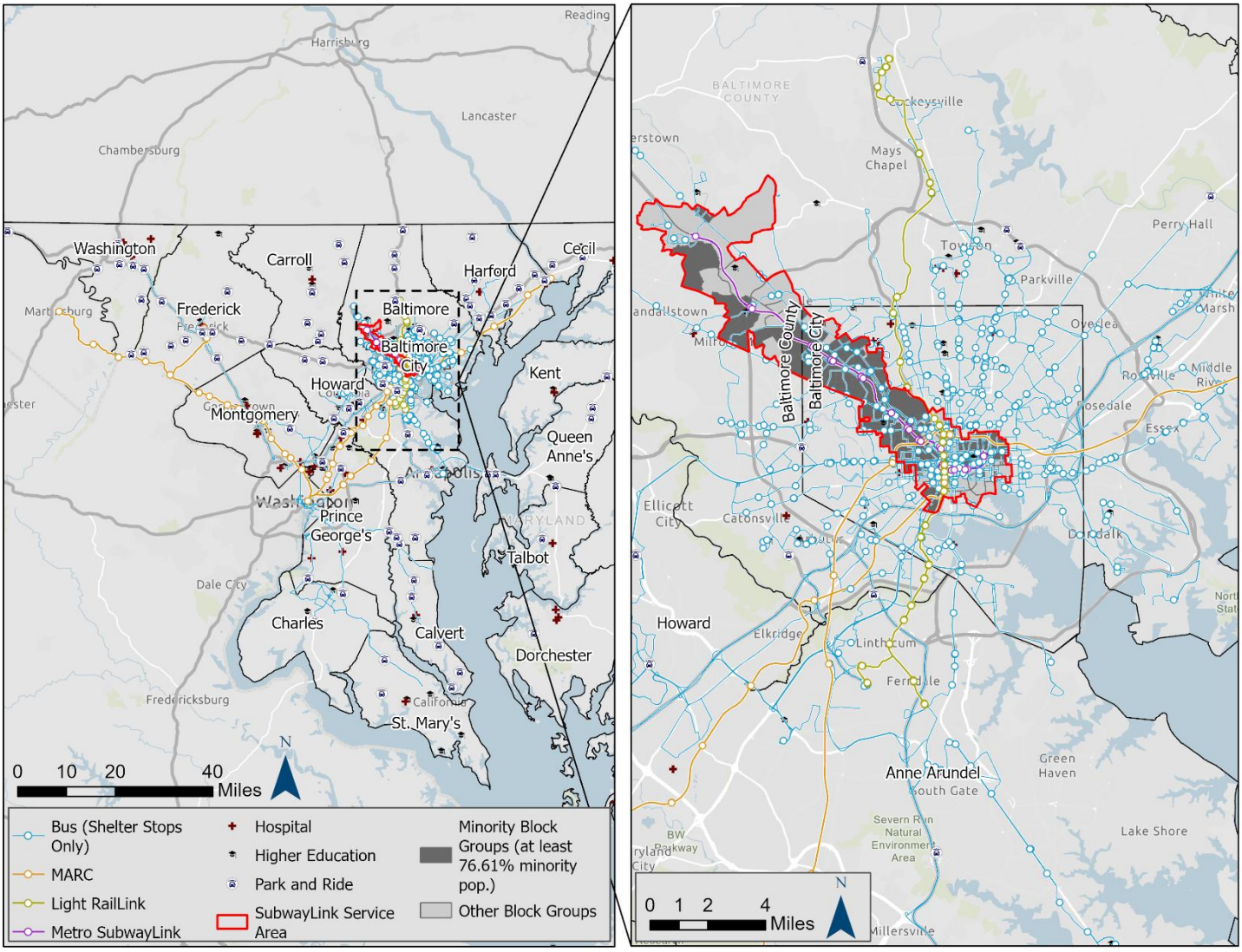
[26] Source: American Community Survey Five-Year Estimates, 2019-2023, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months

Metro Subway Service Area Maps

Minority Block Groups

Figure 19 shows the distribution of minority Block Groups across the Metro Subway service area.[27] Within the Metro Subway service area, a minority Block Group is defined as one with a minority population percentage greater than or equal to the population percentage in the Metro Subway service area, or over seventy-six percent (76.61%). The concentration of minority Block Groups in the Metro Subway service area is relatively high across the entire line, particularly within Baltimore's northwest corridor and around Johns Hopkins.

Figure 19: Metro Subway Service Area: Distribution of Minority Block Groups

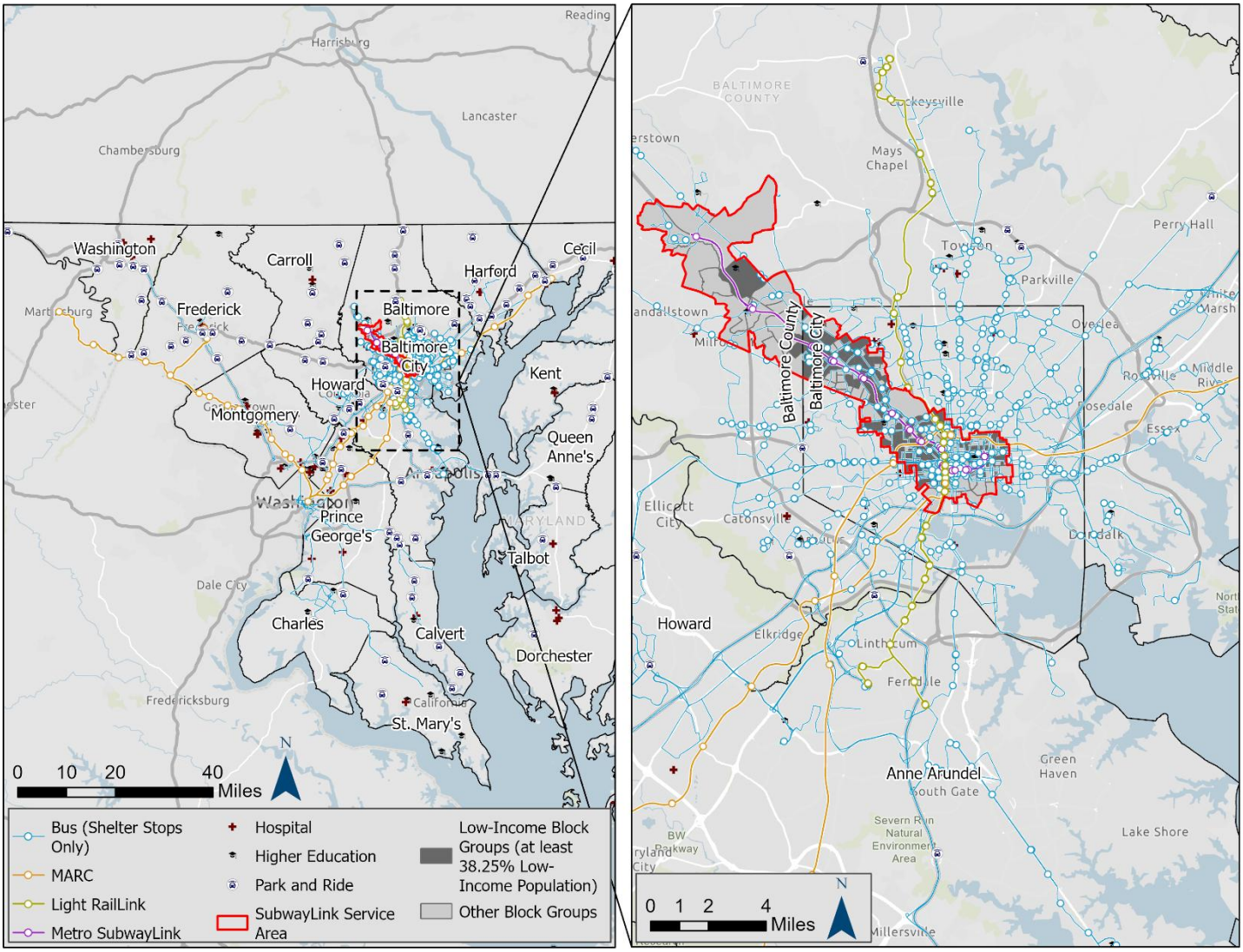


[27] Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Low-Income Block Groups

Figure 20 shows the distribution of low-income Block Groups across the Metro Subway service area.[28] Within the Subway service area, a low-income Block Group is defined as one with a low-income population percentage greater than or equal to thirty-eight percent (38.25%). The concentration of low-income Block Groups in the Metro Subway service area is highest just northwest of central Baltimore City.

Figure 20: Metro Subway Service Area: Distribution of Low-Income Block Groups



[28] Source: American Community Survey Five-Year Estimates, 2019-2023, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months

Ridership Demographics and Travel Patterns

This section uses data from the most recent surveys available, listed below, to describe characteristics and travel patterns across the system. These survey findings can be compared with more recent American Community Survey demographic data to provide a more current view of systemwide demographics.

- Baltimore Link Bus 2025 Origin-Destination Study (responses extrapolated to show average monthly Core Bus passenger trips).
- Baltimore Link Commuter Bus 2025 Origin-Destination Study (responses extrapolated to show average monthly Commuter Bus passenger trips).
- MARC 2025 Origin-Destination Study (responses extrapolated to show average monthly MARC passenger trips).
- Light Rail 2025 Origin-Destination Study (responses extrapolated to show average monthly Light Rail passenger trips).
- Metro Subway 2025 Origin-Destination Study (responses extrapolated to show average monthly Metro Subway passenger trips).
- Commuter Bus 2025 Origin-Destination Study (responses extrapolated to show average monthly Commuter Bus passenger trips).

Demographics

Race/Ethnicity

Based on the origin-destination studies, **Table 43** shows the estimated shares of minority and non-minority (Caucasian or White) riders across MDOT MTA modes. At over fifty-three percent (53.90%), MARC has the relatively lowest share of minority riders, while Core Bus has the highest (nearly ninety percent (89.55%). The overall share of minority population in the Washington-Baltimore-Arlington, DC-MD-WV-PA Combined Statistical Area is approximately forty-eight percent (48%), which suggests the share of minority riders on modes such as MARC and Commuter Bus relatively closely reflects the regional average, while the share of minority riders is higher than average on Light Rail, Metro Subway, and Core Bus.[29]

Table 43: Minority Status by MDOT MTA Mode

	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Minority	89.55%	61.24%	53.90%	79.19%	89.25%
Non-Minority	11.33%	38.76%	46.10%	20.81%	10.75%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Table 44 further breaks down racial representation among MDOT MTA riders, by mode. Core Bus ridership is estimated to be over eighty percent (80.99%) African American or Black and over eleven percent (11.33%) Caucasian. A relatively

[29] American Community Survey Five-Year Estimates, Table B03002: Hispanic or Latino Origin by Race.

higher share of Commuter Bus ridership (nearly thirty-nine percent (38.76%) is Caucasian, while more than forty-two percent (42.53%) is African American. At more than forty-six percent (46.10%), MARC service has the highest percentage of White ridership, followed by African American (more than thirty-six percent (36.20%), and Asian (more than eight percent (8.23%). Light Rail ridership is more than seventy percent (71.00%) African American, followed by Caucasian (over twenty percent (20.81%)), Asian (over one percent (1.17%), and Hispanic (nearly two percent (1.38%). Finally, Metro Subway ridership is the highest percentage in African American ridership (over eighty-two percent (82.52%), followed by Caucasian (over ten percent (10.75%)).

Table 44: Race/Ethnicity of MDOT MTA Riders[30]

Race	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Caucasian/White	11.33%	38.76%	46.10%	20.81%	10.75%
African American/ Black	80.99%	42.53%	36.20%	71.00%	82.52%
Asian	1.01%	6.59%	8.23%	1.17%	0.42%
Hispanic/Latino	3.20%	7.63%	5.81%	1.38%	2.92%
Multiracial	2.45%	3.31%	2.48%	3.69%	2.70%
American Indian/Alaskan Native	0.80%	0.81%	0.39%	0.48%	0.39%
Other	0.20%	0.36%	0.80%	0.29%	0.30%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Income Levels

Table 45 reports on estimated annual household income levels for MDOT MTA riders, by mode. On average, MARC riders reported higher household incomes relative to other modes: almost half of respondents (44.32%) reported household earnings of $100,000 or more. By comparison, more than three percent (3.82%) of Light Rail riders, almost two percent of Metro Subway riders (1.83%), and nearly one percent (0.83%) of Core Bus riders reported household incomes of $100,000 or more. Conversely, almost fifty percent (49.77%) of Light Rail riders, almost forty-five percent (44.67%) of Metro Subway riders, and almost forty percent (39.90%) of Core Bus riders reported household earnings less than $25,000 per year. Commuter Bus ridership reported thirty-seven percent (37.15%) of riders earning at least $100,000 annually, and seventy-six percent (76.00%) of riders earning at least $35,000.

Table 45: Income Levels: Rail and Core Bus

Income	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Less than $10,000	11.60%	1.11%	4.33%	8.90%	11.17%
$10,000 - $19,999	15.93%	0.45%	2.75%	34.64%	24.61%
$20,000 - $24,999	12.37%	0.89%	1.97%	6.23%	8.89%
$25,000 - $34,999	17.87%	2.72%	3.37%	8.03%	10.63%
$35,000 - $49,999	31.68%	29.13%	10.72%	25.26%	24.01%
$50,000 - $74,999	7.23%	17.06%	15.61%	8.76%	12.15%
$75,000 - $99,999	2.50%	11.49%	16.92%	4.36%	6.71%
$100,000 - $149,999	0.52%	17.49%	20.41%	2.36%	1.81%
$150,000 or More	0.31%	19.67%	23.91%	1.46%	0.02%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Limited English Proficiency

English Proficiency

Table 46 summarizes English-speaking proficiency based on the origin-destination rider studies.[31] Across all modes, the vast majority of MDOT MTA riders reported speaking English very well. At over four percent (4.20%), Metro Subway had the highest percentage of riders reporting speaking English "less than very well," while Light Rail had the lowest percentage in this category (over one percent (1.11%)).

Table 46: Riders' English Proficiency: Rail and Bus

English Proficiency of Ridership	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Less than Very Well	3.14%	3.43%	2.79%	1.11%	4.20%
Very Well	96.86%	96.57%	97.21%	98.89%	95.80%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Language Spoken at Home

As part of the origin-destination rider studies, passengers were asked to identify languages spoken at home. As profiled in the Language Assistance Plan, **Table 47** summarizes the top five limited English proficient (LEP) languages (identifying as speaking a language other than English at home and speaking English less than "very well") represented among Core Bus monthly trips.[32] Spanish accounts for the largest percentage of all trips (75,767 monthly passenger

[31] This table only refers to English speaking ability. A separate question addressing English reading proficiency was included later in the survey.

[32] This table only refers to English speaking ability. A separate question addressing English reading proficiency was included later in the survey

trips, or nearly two percent (1.8%), followed by French (less than one percent (0.27%), Arabic (less than one percent (0.17%), other languages (less than one percent (0.10%), and Amharic ((less than one percent (0.08%).

Table 47: Core Bus LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	75,767	1.80%
French	11,464	0.27%
Arabic	7,296	0.17%
Other Languages	4,055	0.10%
Amharic	3,186	0.08%

Source: MTA Baltimore Link Bus Origin-Destination Study (2025)

Table 48 summarizes the top LEP languages represented among Commuter Bus monthly trips. Like Core Bus, Spanish or Spanish Creole represents the highest share of Commuter Bus trips with 2,295, or approximately two and a half percent of all riders, followed by Korean with over half of one percent (0.60 %) and Chinese with more than a quarter of one percent (0.31 %).

Table 48: Commuter Bus LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	2,295	2.53%
Korean	544	0.60%
Chinese	277	0.31%

Table 49 summarizes the top five LEP languages represented among MARC monthly trips. Like other modes, Spanish or Spanish Creole represents the highest share of MARC trips (2,197, or nearly one percent (0.78%) of all riders), followed by French (less than one percent (0.39%), Chinese (less than one percent (0.32%), Vietnamese (less than one percent (0.19%), and Korean (less than one percent (0.19%).

Table 49: MARC LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	2,197	0.78%
French	1,113	0.39%
Chinese	906	0.32%
Vietnamese	544	0.19%
Korean	528	0.19%

Source: MARC Origin-Destination Study (2025)

Table 50 summarizes the top five LEP languages represented among Light Rail monthly trips. Of the origin-destination studies, Spanish or Spanish Creole accounts for the highest share of ridership (1,707 monthly riders, or nearly one

percent (0.58%) of all trips). Spanish or Spanish Creole is followed by French (less than one percent (0.14%), Korean (less than one percent (0.11%), Chinese (less than one percent (0.04%), and Russian (less than one percent (0.03%).

Table 50: Light Rail LEP Riders' Top Languages Spoken[33]

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	1,707	0.58%
French	417	0.14%
Korean	319	0.11%
Chinese	129	0.04%
Russian	90	0.03%

Source: Light Rail Origin-Destination Study (2025)

Table 51 summarizes the top five LEP languages among Metro Subway monthly trips. An estimated 10,948 monthly trips (over two percent (2.15%) belong to Spanish or Spanish Creole LEP riders. This is followed by French (over one percent (1.29%), Hebrew (less than one percent (0.31%), Chinese (less than one percent (0.11%), and Yoruba and Nepali tied with 583 monthly trips (less than one percent (0.11%).

Table 51: Metro Subway LEP Riders' Top Languages Spoken

LEP Language Group	Count of LEP Monthly Passenger Trips	Share of All Monthly Passenger Trips
Spanish or Spanish Creole	10,948	2.15%
French	6,583	1.29%
Hebrew	1,585	0.31%
Chinese	593	0.11%
Yoruba	583	0.11%
Nepali	583	0.11%

Source: Metro Subway Origin-Destination Study (2025)

Rider Travel Patterns

Alternative Trip Mode

In the origin-destination studies, respondents were asked how they would make their current trip if MDOT MTA services were not available (**Table 52**). Of all modes, the highest percentage of MARC riders responding to this question (over fifty-one percent (51.35%)) reported that they would drive themselves if public transit was unavailable. While a relatively low percentage of Core Bus ridership reported being able to drive themselves in such a scenario, nearly twenty-five percent (24.65%) of this mode's ridership would receive a ride from someone else, while nearly forty-four

[33] While American Sign Language ranked third on this list, it is assumed that the majority of American Sign Language speakers can read and write English with higher than limited proficiency.

percent (43.60%) would use a taxi or app-based service such as Uber or Lyft. Meanwhile, for Commuter Bus riders, nearly half (46.52%) would drive themselves, and almost a third (30.37%) would not make the trip.

Among Light Rail riders, nearly sixteen percent (15.51%) would drive themselves, nearly thirteen percent (12.74%) would be driven by someone else, over fourteen percent (14.49%) would not make the trip, and over fifty percent (50.60%) would use a taxi or app-based service. Among Metro Subway trip respondents: over fourteen percent (14.23%) would drive themselves, over twenty-six percent (26.26%) would be driven by someone else, nearly forty percent (39.47%) would use a taxi or an app-based service, and nearly six percent (5.98%) would walk or use a wheelchair.

Table 52: Alternative Mode if MDOT MTA Were Not Available: Rail and Core Bus[34]

	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
Drive Myself	7.33%	46.52%	51.35%	15.51%	14.23%
Driven by Someone	24.65%	14.94%	11.85%	12.74%	26.26%
Taxi or App-Based Service (such as Uber)	43.60%	6.87%	14.89%	50.60%	39.47%
Walk/Wheelchair	6.66%	0.28%	0.76%	4.32%	5.98%
Car/Vanpool	0.12%	-	0.26%	-	-
Bicycle	1.79%	0.30%	0.73%	1.92%	1.06%
Other	0.24%	0.72%	3.10%	0.34%	-
Would Not Make Trip	15.20%	30.37%	16.96%	14.49%	13.01%
Mobility	0.40%	-	0.09%	0.08%	-

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Vehicle Availability

Table 53 summarizes vehicle availability of MDOT MTA riders, as recorded in the five origin-destination studies. Across the modes, over eighty-two percent (82.21%) of Commuter Bus respondents reported having access to a vehicle, meanwhile sixty percent (60.93%) of MARC trip respondents reported having access to a vehicle, only about eighteen percent (18.24%) of Light Rail respondents, over fifteen percent (15.31%) of Metro Subway respondents, and nearly twelve percent (11.58%) of Core Bus trip respondents reported access.

Table 53: Ownership of at Least One Vehicle Among MDOT MTA Rail and Bus Riders

Access to Vehicle	Core Bus	Commuter Bus (Monthly	MARC	Light Rail	Metro Subway (Monthly

[34] When applicable depending on the mode “Some Other Way”, “Amtrak”, and “Private Shuttle” are categorized under “Other”.

	(Monthly Passenger Trips)	Passenger Trips)	(Monthly Passenger Trips)	(Monthly Passenger Trips)	Passenger Trips)
Yes	11.58%	82.21%	60.93%	18.24%	15.31%
No	88.42%	17.79%	39.07%	81.76%	84.69%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Number of Transfers

Table 54 shows the number of transfers MDOT MTA riders make by mode, as recorded in the five origin-destination studies. Of all the modes, Metro Subway respondents had the lowest rate of reporting making zero transfers at a rate of approximately sixty-one percent (61.18%). Commuter Bus had the highest share of riders making no transfers (ninety percent (90.40%). The percentage of respondents reporting needing two or more transfers to complete a trip was relatively highest among MARC respondents (over ten percent (10.96%), followed by Light Rail (nearly nine percent (8.98%), then Metro Subway (four percent (4.21%) and Core Bus (four percent (4.01%).

Table 54: Share of Trips Taken by Mode and Number of Transfers: Rail and Bus

Number of Transfers	Core Bus (Monthly Passenger Trips)	Commuter Bus (Monthly Passenger Trips)	MARC (Monthly Passenger Trips)	Light Rail (Monthly Passenger Trips)	Metro Subway (Monthly Passenger Trips)
None	71.18%	90.40%	68.84%	64.90%	61.18%
One	24.81%	9.60%	20.19%	26.13%	34.60%
Two	3.47%	-	8.84%	8.81%	4.08%
Three	0.46%	-	1.78%	0.17%	0.13%
Four or More	0.08%	-	0.34%	-	-

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Transfers by Minority Status[35]

Based on origin-destination study data for respondents who provided racial information, **Table 55** shows the average number of transfers required for MDOT MTA trips, split by minority and non-minority status. As Core Bus ridership is predominantly minority, respondents reporting any number of transfers predominantly identified as non-White. On MARC service, a relatively higher percentage of minority (versus non-minority) respondents indicated that their trips would take two or three transfers to complete. In the Light Rail survey, this was the case for all but zero transfers; for Metro Subway (a mode predominantly used by minority riders), this was the case for all transfer categories.

Table 55: Share of Transfer Ridership by Minority Status: Rail and Bus

Number of Transfers	Core Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)	
	Minority Share	*Non-Minority Share*	*Minority Share*	*Non-Minority Share*	*Minority Share*	*Non-Minority Share*	*Minority Share*	*Non-Minority Share*	*Minority Share*	*Non-Minority Share*
None	70.38%	78.33%	68.85%	70.67%	62.04%	74.67%	60.33%	66.63%	92.51%	86.27%
One	25.54%	18.64%	19.66%	19.46%	29.86%	12.53%	35.32%	30.28%	7.49%	13.73%
Two	2.63%	3.56%	9.02%	8.23%	7.89%	12.81%	4.20%	3.10%	-	-
Three	0.40%	0.43%	2.04%	1.36%	0.21%	-	0.15%	-	-	-
Four or More	-	0.09%	0.43%	0.27%	-	-	-	-	-	-

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Transfers by Income Status

Based on origin-destination study data for respondents who provided information on household income, **Table 56** shows the average number of transfers required trips, split by reported annual household income. The Core Bus, Commuter Bus, MARC, Light Rail, and Metro Subway studies defined low-income as less than $50,000 household income per year annually.

In the Core Bus study, a relatively higher percentage of respondents identifying as non-low-income reported needing to transfer two or three times to complete a trip; shares of needing to transfer between zero or one time were relatively higher for low-income ridership. On MARC, a relatively higher share of non-low-income respondents reported needing to transfer any number of times to complete a trip. On Light Rail, needing to transfer two times was a slightly more common response among low-income respondents; in the Metro Subway study, this was the case for respondents requiring none or three transfers. For Commuter Bus, non-low-income respondents also required one transfer.

Table 56: Share of Transfer Ridership by Income Status: Rail and Core Bus

Number of Transfers	Core Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)	
	Low-Income Share	*Non-Low-Income Share*	*Low-Income Share*	*Non-Low-Income Share*	*Low-Income Share*	*Non-Low-Income Share*	*Low-Income Share*	*Non-Low-Income Share*	*Low-Income Share*	*Non-Low-Income Share*
None	74.95%	63.48%	66.06%	70.97%	76.18%	76.88%	77.66%	54.69%	95.87%	90.98%
One	21.69%	31.46%	16.38%	20.08%	18.04%	18.22%	18.09%	44.64%	4.13%	9.02%
Two	2.93%	4.47%	13.88%	6.99%	5.55%	4.35%	4.24%	0.66%	-	-
Three	0.36%	0.56%	2.22%	1.90%	0.23%	0.55%	-	-	-	-
Four or More	0.07%	0.04%	1.46	0.06	-	-	-	-	-	-

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Fare Payment[36]

Fare Payment by Minority Status

Based on origin-destination study data for respondents who provided racial information, **Table 57** splits fare payment for trips on each mode by minority/non-minority status. On Core Bus, minority study respondents purchased a larger share of all fare types. On MARC service, this was the case for specific fare types including round trip fare, 5-day full fare, weekly full fare, and senior/disability fare. However, overall, the non-minority share purchased a larger share of all fare types. On Light Rail, the minority share was relatively higher across all fare types by around fourteen percent (14.01%). Similarly, on Metro Subway, minority respondents accounted for a greater share of all fare types, with the highest minority shares attributed to daily passes. On Commuter Bus, non-minority respondents have a greater share across fare types by around nine percent (9.24%).

Table 57: Fare Payment Share by Minority Status: Rail and Core Bus

Fare Type	Core Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)	
	Minority Share	*Non - Minority Share*	*Minority Share*	*Non - Minority Share*	*Minority Share*	*Non - Minority Share*	*Minority Share*	*Non - Minority Share*	*Minority Share*	*Non-Minority Share*
Round Trip Fare	-	-	0.95%	0.81%	8.76%	20.42%	-	-	-	-
Full Fare, Day Pass	32.56%	26.68%	-	-	36.33%	16.24%	47.41%	26.03%	-	-
Full Fare, 5-Day Pass	-	-	3.41%	1.93%	-	-	-	-	-	-
Full Fare, Weekly/7-Day Pass	19.23%	17.77%	1.42%	0.52%	10.88%	5.51%	9.06%	5.68%	-	-
Full Fare, 10-Trip	-	-	-	-	-	-	-	-	8.34%	19.96%
Full Fare, Monthly/31-Day Pass	22.92%	28.38%	12.46%	16.61%	17.38%	9.49%	16.07%	27.70%	44.23%	33.82%
Senior/Disability	6.39%	5.80%	2.97%	2.32%	2.53%	7.35%	2.74%	-	2.17%	2.62%
Charmflex (3,6,10,20 Pack)	0.48%	0.86%	9.04%	12.93%	0.33%	5.04%	1.24%	7.99%	4.73%	11.21%
Student	0.82%	1.10%	1.07%	1.20%	-	-	0.08%	-	-	-
Full Fare, State of Maryland Employee	0.19%	-	0.06%	0.40%	0.01%	-	-	-	0.76%	0.89%
Monthly Pass (Not Specific)	0.06%	-	-	0.41%	0.01%	-	-	-	0.82%	-
Annual Pass	-	-	-	0.38%	-	-	-	-	-	-
None/NA	-	-	0.17%	0.19%	-	-	-	-	-	-
Other	0.18%	-	0.17%	0.82%	1.83%	-	0.01%	-	-	1.81%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Fare Payment by Income Status

Based on origin-destination study data for respondents who provided information on household income, **Table 58** splits fare payment for trips on each mode by reported annual household income. In the Core Bus study, the highest percentage of low-income ridership purchased full fare day passes or full fare monthly passes. On MARC, the non-low-income share of fare payment outnumbered the low-income share across all categories. In the Light Rail study, the low-income share surpassed the non-low-income share across all fare types, with the largest number of trips purchased by low-income, for full fare day passes. On Metro Subway, shares were relatively even between low-income and non-low-income riders, with full-fare day passes being highest for low-income riders and full-fare monthly passes being highest for non-low-income riders. Finally, on Commuter Bus, shares are also relatively even between low-income and non-low-income riders, with full fare one-way passes being highest for low-income riders and full-fare monthly passes being the highest for non-low-income riders.

Table 58: Fare Payment Share by Income Status: Rail and Bus

Fare Type	Core Bus (Monthly Passenger Trips)		MARC (Monthly Passenger Trips)		Light Rail (Monthly Passenger Trips)		Metro Subway (Monthly Passenger Trips)		Commuter Bus (Monthly Passenger Trips)	
	Low-Income Share	***Non-Low-Income Share***	***Low-Income Share***	***Non-Low-Income Share***	***Low-Income Share***	***Non-Low-Income Share***	***Low-Income Share***	***Non-Low-Income Share***	***Low-Income Share***	***Non-Low-Income Share***
Round Trip Fare	-	-	0.95%	0.81%	8.76%	20.42%	-	-	-	-
Full Fare, Day Pass	32.56%	26.68%	-	-	36.33%	16.24%	47.41%	26.03%		
Full Fare, 5-Day Pass	-	-	3.41%	1.93%	-	-	-	-	-	-
Full Fare, Weekly/7-Day Pass	19.23%	17.77%	1.42%	0.52%	10.88%	5.51%	9.06%	5.68%		
Full Fare, 10-Trip	-	-	-	-	-	-	-	-	8.34%	19.96%
Full Fare, Monthly/31-Day Pass	22.92%	28.38%	12.46%	16.61%	17.38%	9.49%	16.07%	27.70%	44.23%	33.82%
Senior/Disability	6.39%	5.80%	2.97%	2.32%	2.53%	7.35%	2.74%	-	2.17%	2.62%
Charmflex (3,6,10,20 Pack)	0.48%	0.86%	9.04%	12.93%	0.33%	5.04%	1.24%	7.99%	4.73%	11.21%
Student	0.82%	1.10%	1.07%	1.20%	-	-	0.08%	-	-	-
Full Fare, State of Maryland Employee	0.19%	-	0.06%	0.40%	0.01%	-	-	-	0.76%	0.89%
Monthly Pass (Not Specific)	0.06%	-	-	0.41%	0.01%	-	-	-	0.82%	-
Annual Pass	-	-	-	0.38%	-	-	-	-	-	-
None/NA	-	-	0.17%	0.19%	-	-	-	-	-	-
Other	0.18%	-	0.17%	0.82%	1.83%	-	0.01%	-	-	1.81%

Source: MDOT MTA Origin-Destination Rider Studies (2025)

Requirement to Set Transit Service Standards and Policies

The FTA Title VI Circular requires that all fixed route public transit providers must set service standards and policies for each specific fixed route mode of service they provide. These standards and policies must address how service is distributed around the system and must ensure that the manner of distribution affords users access to these assets.

Service standards include:

- Vehicle load: the ratio of the number of passengers on a bus compared to the number of seats that are available – used to measure overcrowding on transit vehicles.
- Vehicle headway: Vehicle headway signifies the amount of time between two vehicles traveling in the same direction on a given line.
- On-time Performance: On-time performance refers to the level of success of the service remaining on the published schedule.
- Service Availability: Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service.

Service policies include:

- Transit amenities: Transit amenities refer to items of comfort, convenience, and safety that are available to MDOT MTA's customers. While MDOT MTA aims to provide the amenities specified in this section for each mode, a variety of factors, including property ownership; funding; engineering or right of way constraints; or other external factors can render certain locations ineligible for listed amenities.
- Vehicle assignment: Policies on vehicle assignment determine processes for how transit vehicles are assigned to routes, blocks, or divisions (garages) on a given service day.

Requirement to Monitor Transit Service

The FTA Title VI Circular further states that providers of fixed route services operating 50 or more fixed-route vehicles in peak service located in an urbanized area of 200,000 or more in population must monitor the performance of their transit system relative to the transit service standards and policies they set forth. Providers must do so while comparing minority transit routes with non-minority ones to ensure that services are provided equitably to all persons in the service area without regard to race, color, or national origin.

Following the designations of minority transit routes for each mode of service MDOT MTA provides is a summary by mode of mode-specific service standards and policies and an analysis of service standards and policies vis a vis minority versus non-minority routes. The Service Availability standard and analysis is included at the end of this section in a combined summary table of all modes for ease of use.

Minority Route Designations

The FTA Title VI Circular classifies a minority transit route as a route for which at least one third of revenue miles fall within Census Block Groups having an equal or higher percentage of minority residents than the service area average percent minority population. While this definition was applied to Core Bus, Light Rail, and Metro Subway service, for Commuter Bus and MARC Commuter Rail service, MDOT MTA has adapted FTA's standard for commuter rail service equity analyses, which suggests using a three-mile buffer around commuter rail stations. Although FTA does not provide direct guidance on the use of Census data to categorize limited stop commuter service as minority or non-minority, FTA C 4702.1B states that "a commuter bus that picks up passengers in generally non-minority areas and then travels through predominately minority neighborhoods but does not pick up passengers who live closer to downtown might be more appropriately classified as a non-minority route, even if one-third of the route mileage is located in predominately minority Census Blocks or Census Block Groups." Adapting this methodology, by line, a three-mile buffer was drawn around all Commuter Bus stops (where morning boarding is possible) and MARC stations. Commuter Bus routes and MARC lines were deemed to be minority routes if a third or more of the Census Block Groups within three miles of route or line stops equaled or exceeded the service area average minority population percent.

To define minority routes, given the diverse range of MDOT MTA services, MDOT MTA adapted each of the modal service area definitions outlined in the **Service Area Profile** section of this Title VI Program. Using the Census Block Groups within each mode's service area, five separate service area minority percentages were calculated and used as baseline to determine the prevalence of minority and non-minority Block Groups. Minority and non-minority routes for each MDOT MTA mode are listed in the subsections that follow.

Core Bus

Within the Core Bus service area, comprised of all Census Block Groups within 0.5 miles of Core Bus stops, the percentage of minority population is nearly fifty-nine percent (58.82%). Core Bus minority routes are routes for which at least one third of the route length (revenue miles) operates through minority Census Block Groups, or Block Groups with a minority percentage greater than or equal to nearly fifty-nine percent (58.82%).

Table 59 lists Core Bus routes by minority status as well as the percentage Block Groups through which each route operates that are classified as minority Block Groups. All CityLink routes and all but three Express Bus routes are classified as minority routes. In addition, of 46 Local Bus routes, only eleven are classified as non-minority. Overall, 52 routes (approximately seventy-nine percent (78.79%)) of Core Bus routes are minority routes, while 14 routes (about twenty-one percent (21.21%) are non-minority routes.

Table 59: Core Bus Minority Route Status

Service Type	Core Bus Route	Minority Route	Percent Minority Block Groups
CityLink	Blue	Yes	69.23%
	Brown	Yes	81.47%
	Gold	Yes	70.53%
	Green	Yes	66.82%
	Lime	Yes	96.45%
	Navy	Yes	51.52%
	Orange	Yes	40.10%
	Pink	Yes	95.92%
	Purple	Yes	55.92%
	Red	Yes	66.67%
	Silver	Yes	44.39%
	Yellow	Yes	46.37%
Local Bus	21	Yes	45.43%
	22	Yes	60.07%
	26	Yes	95.24%
	28	Yes	72.28%
	29	Yes	78.43%
	30	Yes	66.44%
	31	Yes	88.54%
	32	No	7.25%
	33	Yes	44.70%
	34	Yes	47.07%
	36	Yes	46.15%
	37	Yes	59.64%
	38	Yes	77.72%
	40	Yes	47.16%
	51	No	16.86%
	52	Yes	36.37%
	53	Yes	50.56%
	54	Yes	62.25%
	56	Yes	36.59%
	57	Yes	100.00%
	59	Yes	38.06%
	62	No	12.40%
	63	No	22.55%
	65	No	10.93%
	67	No	30.17%
	69	Yes	47.86%
	70	No	28.00%
	71	Yes	57.43%

Service Type	Core Bus Route	Minority Route	Percent Minority Block Groups
	73	Yes	80.38%
	75	Yes	46.98%
	76	No	20.04%
	77	Yes	58.66%
	78	Yes	86.86%
	79	Yes	88.58%
	80	Yes	92.54%
	81	Yes	99.35%
	82	Yes	100.00%
	83	Yes	70.74%
	85	Yes	76.02%
	87	Yes	60.18%
	89	Yes	62.05%
	91	Yes	83.62%
	92	No	20.09%
	93	No	11.47%
	94	No	21.69%
	95	Yes	37.91%
Express Bus	103	Yes	66.62%
	105	Yes	82.86%
	115	Yes	65.88%
	120	No	29.73%
	150	Yes	57.59%
	154	Yes	61.59%
	160	No	13.26%
	163	No	13.26%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Commuter Bus

Within the Commuter Bus service area, comprised of all Census Block Groups within three miles of stops (excluding stops where morning boarding is not possible), the percentage of minority population is fifty-eight percent (58.07%). Commuter Bus minority routes are routes for which at least one third of the Census Block Groups within three miles of route stops are minority Block Groups, or Block Groups with a minority percentage greater than or equal to fifty-eight percent (58.07%).

Table 60 lists Commuter Bus routes by minority status. Of 36 total routes, 13 (thirty-six percent (36.11%)) are classified as non-minority routes, while 23 (sixty-four percent (63.89%)) are classified as minority routes.

Service Type	Core Bus Route	Minority Route	Percent Minority Block Groups
	73	Yes	80.38%
	75	Yes	46.98%
	76	No	20.04%
	77	Yes	58.66%
	78	Yes	86.86%
	79	Yes	88.58%
	80	Yes	92.54%
	81	Yes	99.35%
	82	Yes	100.00%
	83	Yes	70.74%
	85	Yes	76.02%
	87	Yes	60.18%
	89	Yes	62.05%
	91	Yes	83.62%
	92	No	20.09%
	93	No	11.47%
	94	No	21.69%
	95	Yes	37.91%
Express Bus	103	Yes	66.62%
	105	Yes	82.86%
	115	Yes	65.88%
	120	No	29.73%
	150	Yes	57.59%
	154	Yes	61.59%
	160	No	13.26%
	163	No	13.26%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Commuter Bus

Within the Commuter Bus service area, comprised of all Census Block Groups within three miles of stops (excluding stops where morning boarding is not possible), the percentage of minority population is fifty-eight percent (58.07%). Commuter Bus minority routes are routes for which at least one third of the Census Block Groups within three miles of route stops are minority Block Groups, or Block Groups with a minority percentage greater than or equal to fifty-eight percent (58.07%).

Table 60 lists Commuter Bus routes by minority status. Of 36 total routes, 13 (thirty-six percent (36.11%)) are classified as non-minority routes, while 23 (sixty-four percent (63.89%)) are classified as minority routes.

Table 60: Commuter Bus Minority Route Status

Commuter Bus Route	Minority Route	Percent Minority Block Groups
201	Yes	59.48%
203	Yes	50.35%
204	Yes	48.33%
210	No	14.63%
215	Yes	62.95%
220	No	10.29%
230	No	7.14%
240	No	0.00%
250	No	3.57%
260	No	1.96%
305	Yes	53.67%
310	Yes	35.71%
315	Yes	52.30%
320	Yes	68.70%
325	Yes	50.18%
335	No	32.89%
345	Yes	33.33%
410	No	8.60%
411	No	13.18%
420	No	19.15%
505	Yes	39.07%
515	Yes	36.73%
610	Yes	90.83%
620	Yes	87.80%
630	Yes	77.08%
640	Yes	88.24%
650	Yes	71.43%
705	Yes	66.67%
715	Yes	66.67%
725	No	9.52%
735	Yes	91.22%
810	Yes	47.06%
820	Yes	47.50%
830	No	5.00%
840	No	3.23%
850	Yes	87.83%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

MARC Commuter Rail

Within the MARC service area, comprised of all Census Block Groups within three miles of stations, the percentage minority population is sixty-three percent (63.14%). MARC Commuter Rail minority lines are lines for which at least one third of the Census Block Groups within three miles of line stops are minority Block Groups, or Block Groups with a minority percentage greater than or equal to sixty-three percent (63.14%).

MARC Commuter Rail service is comprised of three rail lines (**Table 61**): the Penn Line, Camden Line, and Brunswick Line. All three lines are classified as minority lines due to the composition of Block Groups within each service area:

Table 61: MARC Commuter Rail Minority Route Status

Route	Minority Route	Percent Minority Block Group
Penn - Washington	Yes	51.79%
Camden - Washington	Yes	56.20%
Brunswick - Washington	Yes	39.27%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Light Rail

Within the Light Rail service area, comprised of all Census Block Groups within 0.75 miles of Light Rail stops, the percentage minority population is fifty-two percent (52.50%) Light Rail minority lines are lines for which at least one third of the line length (revenue miles) operates through minority Census Block Groups, or Block Groups with a minority percentage greater than or equal to fifty-two percent (52.50%).

Light Rail consists of a 30-mile north-south Light Rail line that spans part of Baltimore County, the entire length of the City of Baltimore, and part of Anne Arundel County. There are three service patterns (**Table 62**) providing Light Rail service to 33 stations: Hunt Valley to BWI Airport; Hunt Valley to Cromwell Station/Glen Burnie; and Penn Station to Camden Yards. In this Title VI Program, each service pattern is defined as a separate line:

- The Hunt Valley to BWI Airport pattern passes through 41 Census Block Groups, 14 of which (around thirty-four percent (34.15%) are minority Block Groups.
- The Hunt Valley to Cromwell Station/Glen Burnie pattern passes through 44 Census Block Groups, 14 of which (almost thirty-two percent (31.82%) are minority Block Groups.
- Based on revenue miles, only the Penn-to-Camden service pattern of Light Rail can be classified as a minority line. However, in addition to the minority route analysis, MDOT MTA may classify routes as minority based on on-board survey data, per FTA C 4702.1B. The MDOT MTA Light Rail Origin-Destination Study, completed in 2025, found that approximately seventy-nine percent (79.19%) of all Light Rail riders are minority. Thus, all three Light Rail service patterns are classified as minority lines in this Title VI Program.

Table 62: Light Rail Minority Route Status

Service Type	Route (Service Pattern)	Minority Route	Percent Minority Block Group
Light Rail	Hunt Valley - BWI	Yes (Based on O-D Study Data)	25.22%
	Hunt Valley - Glen Burnie	Yes (Based on O-D Study Data)	29.61%
	Penn-Camden	Yes	76.49%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Metro Subway

Within the Metro Subway service area, comprised of all Census Block Groups within three-quarters of a mile (0.75 miles) of Metro Subway stops, the percentage minority population is seventy-seven percent (76.61%). Metro Subway line passes through 43 Block Groups within the Metro Subway service area, 31 of which are minority Block Groups (Block Groups with a minority percentage greater than or equal to seventy-seven percent (76.61%). A minority line is a line for which at least one third of the line length (revenue miles) operates through minority Census Block Groups. In Metro Subway's case, sixty-one percent (60.84%) of its route travels through minority Block Groups, thus classifying it as a minority route (**Table 63**).

Table 63: Metro Subway Minority Route Status

Route	Minority Route	Percent Minority Block Group
Subway	Yes	60.84%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Core Bus

Core Bus Service Standards

Vehicle Load

Vehicle load standard—the ratio of the number of passengers on a bus compared to the number of seats that are available—is used to measure overcrowding on MTA transit vehicles. For example, a load standard of 1.0 would recommend that the number of passengers on a bus not exceed the number of seats.

The seated capacity of buses MDOT MTA uses for BaltimoreLink Core Bus service is between 36 and 58 passengers, depending on the series of vehicle used. Target load standards (**Table 64**) are set by time period and type of service. MDOT MTA regularly monitors trip-level data; trips experiencing maximum loads greater than those listed below are deemed overcrowded. Relatively higher loads are permitted on peak CityLink and Local Bus trips. On Express Bus service, a trip with any number of standees is considered overcrowded.

Table 64: Core Bus Vehicle Load Standards

	Weekday Load Standard						Saturday Load Standard	Sunday Load Standard
	Early	AM Peak	Midday	PM Peak	Evening	Late Night		
CityLink	1.1	1.3	1.1	1.3	1.2	1.1	1.1	1.1
Local Bus	1.0	1.3	1.0	1.3	1.0	1.0	1.0	1.0
Express Bus	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
QuickLink	1.1*	1.3	1.1*	1.3	1.2*	1.1*	1.1*	1.1*

** If operating*
Source: MDOT MTA

Table 65 shows the range of Core Bus vehicles (by seating capacity) potentially assigned to any Core Bus route. As the maximum load standard (for AM and PM Peak service on CityLink and Local Routes) is 1.3, this table multiplies seating capacity by this load standard and rounds to the nearest whole number to display maximum passenger load across vehicle types. Maximum passenger load during a peak period range from 46 to 75.

Table 65: Core Bus Vehicle Seating Capacities, Maximum Load Standards, and Maximum Passenger Load

Vehicle Seating Capacity	MDOT MTA Maximum Load Standard (Peak)	Maximum Passenger Load
36	1.3	46
40	1.3	52
57	1.3	74
58	1.3	75

Source: MDOT MTA

As part of the BaltimoreLink performance monitoring program, each month, MDOT MTA averages trip-level data to estimate the percentage of trips by period that exceeds the given maximum load standard. This is calculated using the average maximum load for each trip across a service month. The agency evaluates overcrowding performance (considered a safety metric) based on the percentage of trips deemed overcrowded by period using the following thresholds:

- Level I, Excellent: Between zero percent (0%) and one percent (1%) overcrowded trips in a period.
- Level II, Good: Between one percent (1%) and three percent (3%) overcrowded trips in a period.
- Level III, Needs Monitoring: Between three percent (3%) and five percent (5%) overcrowded trips in a period.
- Level IV, Consider Modification: Between five percent (5%) and ten percent (10%) overcrowded trips in a period.
- Level V, Consider Modification: Greater than ten percent (10%) overcrowded trips in a period.

For example, if five of a route's 10 trips during the AM Peak period averaged a maximum load exceeding the load standard for that period, the overcrowded trip rate would qualify as "Level V." Conversely, if zero trips in a period averaged a maximum load greater than the allowable standard, the overcrowded trip rate would qualify as "Level I."

Vehicle Headway

Vehicle headway signifies the amount of time between two vehicles traveling in the same direction on a given line.

Table 66 summarizes Core Bus maximum headways by service type and time period. CityLink, which operates during all hours on weekdays, runs service every 10 to 15 minutes during peak and midday periods, every 20-30 minutes during evening periods, and at least every 45 minutes on weekends. Local service has a relatively less frequent maximum headway: between 10 and 60 minutes on weekdays, and between 15 and 60 minutes on weekends. Express BusLink, which typically operates only during peak periods, runs at least every 30 minutes. The Core Bus headway policy notes that actual frequencies may vary by route, deviating from maximum headways specified in **Table 66** in select cases.

Table 66: Core Bus Maximum Headways by Service Type and Time Period

Time Period	Maximum Headway			
	CityLink	Local Bus	Express Bus	QuickLink
AM and PM Peak	10-15 minutes	15-30 minutes	30 minutes	30 minutes

Time Period	Maximum Headway			
	CityLink	Local Bus	Express Bus	QuickLink
Midday	15 minutes	30-60 minutes	Varies based on need	Varies based on need; may not operate
Evening	30 minutes	30-60 minutes	Varies based on need	Varies based on need; may not operate
Late Night	Varies based on need	Varies based on need; may not operate	Varies based on need; may not operate	Varies based on need; may not operate
Weekend	60 minutes	60 minutes	Varies based on need	Varies based on need; may not operate

On-Time Performance

Core Bus service refers to on-time performance as "schedule performance." Schedule performance is measured in the following two ways:

- By timepoint: the percentage on-time departures from route-trip timepoints (or for route/trips' final timepoints, the percentage on-time arrivals).
- By trip: the percentage on-time arrivals at route-trip final timepoints.

For all Core Bus routes, a bus is considered on-time or adhering to schedule if it departs at a given timepoint between two minutes before and seven minutes after (inclusive of the limits) the scheduled departure time. Whether by timepoint or by trip, the target schedule performance rate for all routes across all time periods and day types is seventy eighty percent (78%) on-time. Core Bus considers modifying a route pattern if schedule performance is consistently between sixty-five percent (65%) and seventy percent (70%).

Core Bus Service Policies

Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to MDOT MTA's customers. While MDOT MTA aims to provide the amenities specified in this section for each mode, a variety of factors, including property ownership; funding; engineering or right of way constraints; or other external factors can render certain locations ineligible for listed amenities.

Core Bus policies on transit amenities were developed in the MDOT MTA Bus Stop Design Guide, which was completed after submission of the agency's previous Title VI Program. Policies on specific amenities are described in what follows.

Bus Shelters

The goal for placing shelters within the BaltimoreLink bus network is to improve comfort for the greatest number of passengers. Shelter locations are chosen using a three-part scoring system that measures, at each stop:

- How many people are waiting?
    - Boardings – one point per average weekday boarding.
- How long are people waiting? (up to 25 points)
    - Transfers – 15 points if the stop is located at a named place labeled on the official BaltimoreLink system map.
    - Frequency – 10 points if the stop is outside of the Frequent Transit Network (less than four buses per hour serve the stop during the weekday AM peak, midday, and PM peak periods).
- Who is waiting? (up to 50 points)
    - Title VI – 25 points if the stop is in a predominantly minority area, low-income area, or both
    - Human services facilities – 15 points if one or more of the following are within 750 feet of the stop: assisted living facility, dialysis center, hospital, pharmacy/clinic, public library, public school, recreation center, senior center, or supermarket.
    - Operator Reliefs – 10 points if the stop is used by MDOT MTA operators as a relief point.

Under the scoring system, bus stops must receive at least a score of 100 to be a candidate for shelter placement. Bus stops determined as eligible for a shelter are also analyzed for site suitability, including accessibility to boarding areas, bus door opening zones, or posted information; clear paths to shelters; and accessibility for riders with disabilities or senior riders. All new shelters shall include lighting for the waiting area, when feasible. Finally, bus shelters may include printed wayfinding panels and, in some cases, BaltimoreLink system maps. MDOT MTA has resources to install benches attached to shelters; however, seating at other bus stops is the responsibility of local governments or private organizations.

Real-Time Information Displays

Real-time information displays, which range from simple one-color, one-line LED text displays to large LCD screens, make bus arrival information immediately available to waiting passengers. MDOT MTA uses a tiered system to determine where to place real-time displays, placing real-time information displays at 'Tier I' off-street transfer

centers and some 'Tier II' on-street transfer centers (where feasible). Displays are to be sited and mounted so as not to interfere with pedestrian traffic and should be accompanied by audible announcements. Information communicated through real-time systems should be succinct. Displays are not to broadcast commercial content.

Fare Machines

Fare machines, also known as ticket vending machines (TVMs), are secure electronic kiosks that allow passengers to purchase single fares, passes, and add value to stored-value CharmCard smart cards. MDOT MTA installs fare machines at all Tier I off-street transfer centers and at some Tier II on-street transfer centers. Fare machines should not block accessible paths or boarding areas and should incorporate braille or other tactile labels for buttons and keys, as well as audible instructions on how to use the machine.

Covered Bicycle Racks

MDOT MTA installs covered bicycle racks at Tier I off-street transfer centers and some Tier II on-street transfer centers. Covered racks must not block accessible paths and boarding areas, bus door opening zones, shelters, or posted information. They are to be placed in areas with adequate lighting and use a high-density design that stacks bikes using wheel channels, security bars, or hangs bikes with wheel hooks.

Public Art

MDOT MTA commissions public art for some Tier I off-street transfer center and Tier II on-street transfer centers. Public art installations must not interfere with bus stop accessibility. Although public art is listed as a provided amenity in the Bus Stop Design Guide, it is not monitored in this Title VI Program.

Amenities Not Provided

MDOT MTA does not provide the following amenities at bus stops, which are deemed the responsibility of local governments or private organizations:

- Benches at bus stops without shelters
- Trash receptacles
- Bicycle racks
- Green infrastructure
- Lighting, except where installed at bus shelters

Vehicle Assignment

Policies on vehicle assignment determine processes for how transit vehicles are assigned to routes, blocks, or divisions (garages) on a given service day.

MDOT MTA's Core Bus vehicle assignment policy, defined below, seeks to "even out" the average fleet age at each bus division. This ensures that no one division has a predominantly new or old fleet at a given time.

Division Assignment

MDOT MTA operates four bus divisions: Bush, Eastern, Kirk, and Northwest. The divisions vary in parking and maintenance capacity, and responsibility for delivery of service is spread across the divisions based on these capacities. Buses are assigned to divisions so that the average fleet age at each division closely approximates the average fleet age of the entire Core Bus fleet. For example, if the average age of the entire bus fleet is 6.8 years, the average age of the division fleet should be approximately 6.8 years.

Block Assignment

Each Core Bus division operates multiple routes, with routes operated out of one or two divisions. Division route assignment is based on operational realities such as proximity to break-in and pull-off points, efficiency of deadhead movements, and convenience of operator street reliefs. Bus transportation staff at each bus division is responsible for the daily assignment of buses to blocks. Each division operates a variety of route types (CityLink, Local, and Express Bus), with much interlining.

Due to these variables, as well as the need to match buses to divisions such that the average fleet age matches the system average, buses are assigned to blocks randomly. For example, divisions share a total fleet of 62 articulated (60-foot buses), stored by division as follows:

- Bush Division: 21 buses
- Eastern Division: 15 buses
- Kirk Division: 10 buses
- Northwest Division: 16 buses.

Articulated vehicles are generally assigned to blocks that experience sustained, heavy loading conditions or to routes being rebuilt to add frequency (capacity) with 40-foot buses. This translates to articulated vehicles being most commonly assigned to minority routes, or routes that serve transit dependent populations and travel through densely populated areas. Non-articulated vehicles may be assigned from divisions based on capacity, meaning that vehicles with more capacity may be assigned to routes with higher ridership or during peak periods.

Core Bus Transit Service Monitoring

Analysis of Service Standards

This section analyzes MDOT MTA service standards among minority and non-minority routes.

Vehicle Load

On Core Bus service, trips experiencing maximum loads greater than load standards set by period (and by service type) are considered overcrowded. Vehicle load standards by time of day are shown in the Service Standards section of this document. Through its performance monitoring program, MDOT MTA measures vehicle load standards based on the percentage of trips, by time period, deemed overcrowded. **Table 67** summarizes weekday overcrowded trip percentages on Core Bus service during April 2025. **Figure 21** summarizes this information by minority and non-minority route status. **Table 68** summarizes weekend overcrowded trip percentages during this time period, while **Figure 22** summarizes this information by minority and non-minority route status.

Across this summary, overcrowding percentages have been color-coded as follows:

- Level I, Excellent: Between zero percent (0%) and one percent (1%) overcrowded trips in a period (Green).
- Level II, Good: Between one percent (1%) and three percent (3%) overcrowded trips in a period (Blue).
- Level III, Needs Monitoring: Between three percent (3%) and five percent (5%) overcrowded trips in a period (Brown).
- Level IV, Consider Modification: Between five percent (5%) and ten percent (10%) overcrowded trips in a period (Red).
- Level V, Consider Modification: Greater than ten percent (10%) overcrowded trips in a period (Purple).

Most Core Bus routes are minority routes. As detailed in **Table 67** and **Figure 21**, during April 2025, overall overcrowding percentages were very low. Where some overcrowding did occur, it tended to be on weekdays mainly during the midday and early periods, followed by the AM peak and PM peak periods, with minority routes showing a higher average rate of crowding than non-minority routes (**Table 67** and **Figure 21**). On weekends (**Table 68** and **Figure 22**), the highest rates of overcrowding occurred on minority routes during the peak periods.

Table 67: Core Bus Average Weekday Overcrowding, April 2025

Route	Minority Route	Overcrowded Percentage					
		Early AM	***AM Peak***	***Midday***	***PM Peak***	***Evening***	***Late Night***
21	Yes	0.00%	0.03%	0.26%	0.03%	0.00%	0.00%
22	Yes	0.00%	0.20%	0.54%	0.17%	0.26%	0.00%
26	Yes	0.00%	0.01%	0.21%	0.07%	0.28%	0.28%
28	Yes	0.86%	0.10%	0.03%	0.11%	0.06%	0.00%
29	Yes	0.00%	0.03%	0.26%	0.02%	0.01%	0.00%
30	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	No	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
33	Yes	0.00%	0.01%	0.00%	0.11%	0.00%	0.00%
34	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
36	Yes	0.16%	0.02%	0.19%	0.00%	0.58%	0.00%
37	Yes	0.00%	0.01%	0.08%	0.00%	0.02%	0.00%
38	Yes	-	0.00%	-	0.10%	-	-

Route	Minority Route	Overcrowded Percentage					
		Early AM	*AM Peak*	*Midday*	*PM Peak*	*Evening*	*Late Night*
40	Yes	-	0.00%	0.00%	0.00%	0.00%	-
51	No	0.00%	0.00%	0.00%	0.32%	0.00%	0.00%
52	Yes	0.00%	0.00%	-	0.00%	-	0.00%
53	Yes	0.00%	0.02%	0.01%	0.07%	0.00%	0.00%
54	Yes	0.20%	0.02%	0.64%	0.08%	1.17%	0.00%
56	Yes	1.30%	0.14%	0.90%	0.04%	1.09%	0.00%
57	Yes	-	0.00%	0.00%	0.00%	0.00%	-
59	Yes	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%
62	No	0.36%	0.06%	0.29%	0.04%	0.34%	0.00%
63	No	1.01%	0.00%	0.00%	0.00%	0.11%	0.00%
65	No	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%
67	No	0.00%	0.00%	0.00%	0.00%	0.22%	0.00%
69	Yes	0.00%	0.00%	0.10%	0.05%	0.05%	0.00%
70	No	0.00%	0.00%	0.09%	0.00%	0.00%	0.00%
71	Yes	0.00%	0.08%	0.49%	0.01%	0.00%	0.00%
73	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
75	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
76	No	0.70%	0.00%	0.00%	0.04%	0.00%	0.00%
77	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
78	Yes	1.43%	0.00%	0.16%	0.06%	0.02%	0.00%
79	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
80	Yes	0.00%	0.00%	0.50%	0.10%	0.22%	0.08%
81	Yes	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%
82	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
83	Yes	0.00%	0.00%	0.27%	0.00%	0.04%	0.00%
85	Yes	0.00%	0.06%	0.46%	0.23%	0.33%	0.00%
87	Yes	0.00%	0.00%	0.13%	0.00%	0.00%	0.00%
89	Yes	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
91	Yes	1.71%	0.00%	0.00%	0.00%	0.00%	0.00%
92	No	-	0.00%	-	0.02%	0.00%	-
93	No	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
94	No	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%
95	Yes	0.00%	0.00%	-	0.00%	0.00%	-
103	Yes	-	0.13%	-	0.13%	-	-
105	Yes	-	2.67%	-	0.18%	-	-
115	Yes	0.00%	0.05%	-	0.00%	0.00%	-
120	No	-	0.00%	0.00%	0.00%	0.00%	-
150	Yes	0.00%	0.00%	-	0.00%	0.00%	-
154	Yes	-	0.24%	-	0.06%	-	-

Route	Minority Route	Overcrowded Percentage					
		Early AM	*AM Peak*	*Midday*	*PM Peak*	*Evening*	*Late Night*
160	No	-	0.00%	-	0.00%	-	-
163	No	1.59%	0.04%	0.03%	1.18%	0.35%	0.00%
BL	Yes	0.00%	0.03%	0.65%	0.12%	0.08%	0.05%
BR	Yes	0.10%	0.08%	0.22%	0.18%	0.74%	0.25%
GD	Yes	0.30%	0.03%	0.35%	0.07%	0.00%	0.00%
GR	Yes	0.00%	0.02%	0.29%	0.05%	0.20%	0.00%
LM	Yes	0.02%	0.05%	0.30%	0.09%	0.00%	0.00%
NV	Yes	0.00%	0.02%	0.14%	0.14%	0.01%	0.00%
OR	Yes	0.29%	0.19%	0.84%	0.29%	0.14%	0.22%
PK	Yes	0.07%	0.28%	0.32%	0.34%	0.21%	0.00%
PR	Yes	0.30%	0.04%	0.05%	0.04%	0.00%	0.00%
RD	Yes	0.00%	0.03%	0.54%	0.12%	0.27%	0.00%
SV	Yes	0.00%	0.07%	0.08%	0.01%	0.00%	0.00%
YW	Yes	0.79%	0.00%	0.56%	0.09%	0.02%	0.00%

Source: MDOT MTA

Figure 21: Core Bus Average Weekday Overcrowding Summary (Minority and Non-Minority Routes), April 2025

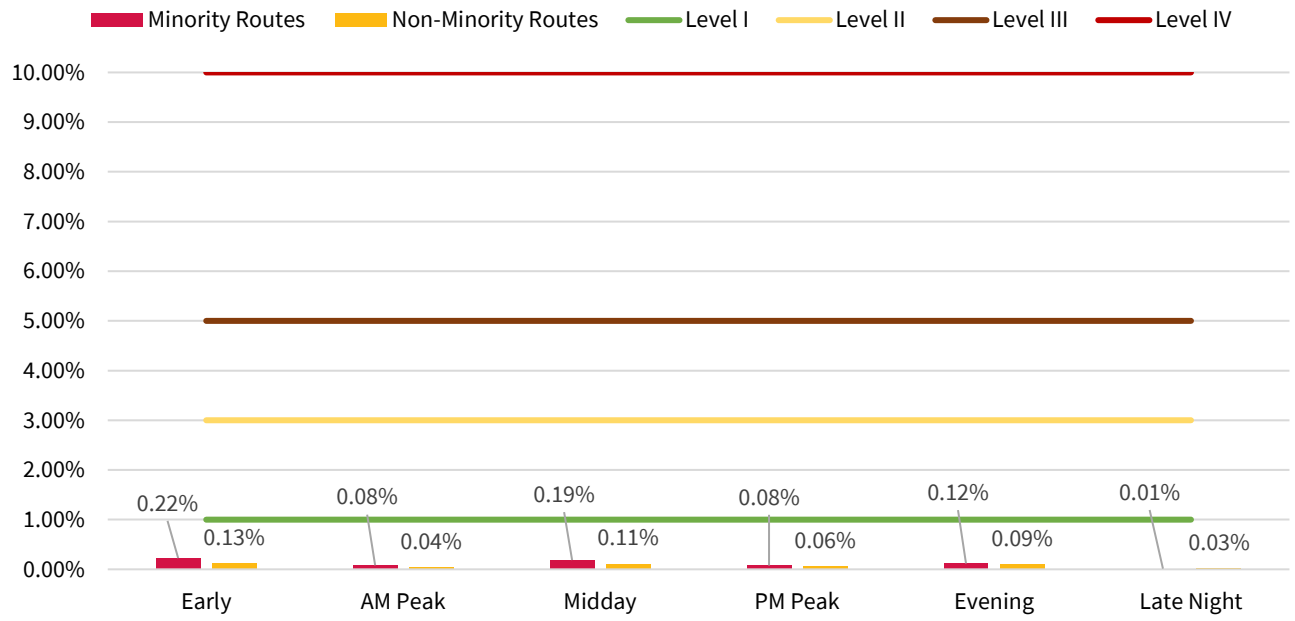


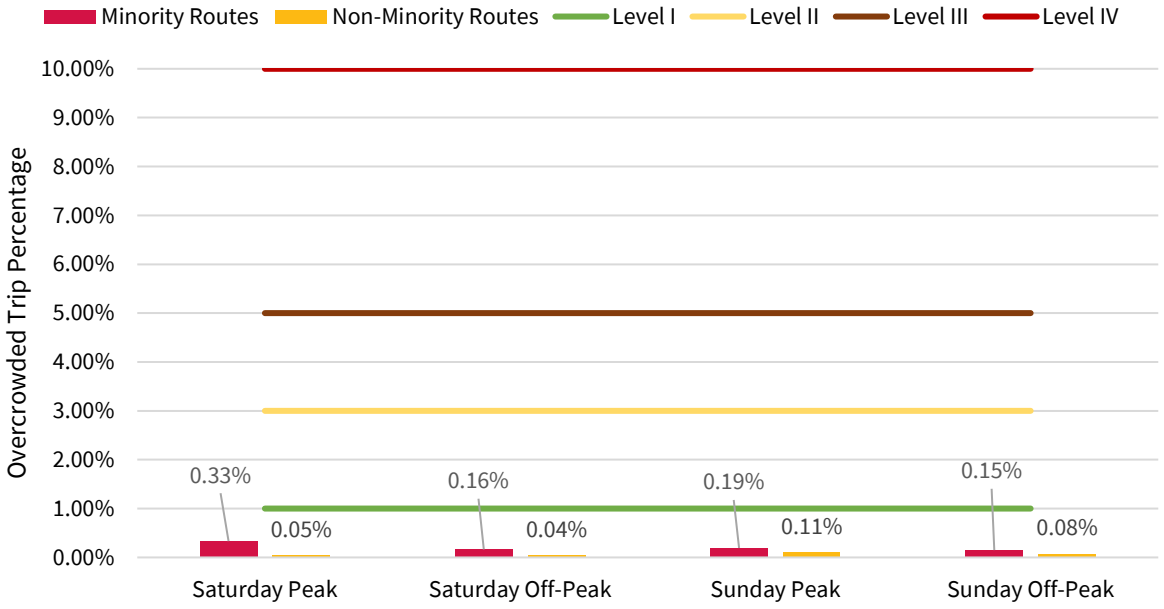
Table 68: Core Bus Average Weekend Overcrowding, April 2025

Route	Minority Route	Overcrowded Percentage			
		Saturday Peak	***Saturday Off-Peak***	***Sunday Peak***	***Sunday Off-Peak***
21	Yes	0.00%	0.00%	0.00%	0.00%
22	Yes	1.03%	0.09%	0.33%	0.00%
26	Yes	0.95%	0.55%	0.22%	0.01%
28	Yes	0.00%	0.00%	0.00%	0.00%
29	Yes	0.04%	0.00%	0.00%	0.05%
30	Yes	0.00%	0.00%	0.00%	0.00%
31	Yes	0.00%	0.00%	0.00%	0.00%
32	No	0.00%	0.00%	0.00%	0.00%
33	Yes	0.00%	0.00%	0.00%	0.00%
34	Yes	0.00%	0.00%	0.00%	0.00%
36	Yes	0.00%	0.00%	0.00%	0.00%
37	Yes	0.00%	0.00%	0.00%	0.00%
38	Yes	-	-	-	-
40	Yes				
51	No	0.00%	0.00%	0.00%	0.00%
52	Yes	-	-	-	-
53	Yes	0.00%	0.00%	0.00%	0.00%
54	Yes	0.08%	0.00%	0.00%	0.27%
56	Yes	1.29%	0.61%	0.77%	0.54%
57	Yes	0.00%	0.00%	0.00%	0.00%
59	Yes	0.00%	0.00%	0.00%	0.00%
62	No	1.20%	0.00%	0.00%	0.00%
63	No	0.32%	0.05%	0.49%	0.00%
65	No	0.00%	0.00%	0.00%	0.00%
67	No	0.00%	0.00%	0.00%	0.00%
69	Yes	0.00%	0.10%	0.00%	0.00%
70	No	0.15%	0.00%	0.00%	0.00%
71	Yes	0.12%	0.00%	0.00%	0.00%
73	Yes	0.00%	0.00%	0.00%	0.00%
75	Yes	0.00%	0.00%	0.00%	1.65%
76	No	0.00%	0.00%	0.00%	0.05%
77	Yes	0.00%	0.00%	0.00%	0.00%
78	Yes	0.00%	0.00%	0.00%	0.00%
79	Yes	0.00%	0.00%	0.00%	0.00%
80	Yes	0.02%	0.30%	0.00%	0.00%
81	Yes	0.00%	0.00%	0.00%	0.00%
82	Yes	0.00%	0.00%	0.00%	0.00%
83	Yes	0.00%	0.00%	0.00%	0.18%

Route	Minority Route	Overcrowded Percentage			
		Saturday Peak	*Saturday Off-Peak*	*Sunday Peak*	*Sunday Off-Peak*
85	Yes	0.00%	0.06%	0.44%	0.09%
87	Yes	1.50%	0.00%	0.00%	0.00%
89	Yes	1.08%	0.00%	0.00%	0.00%
91	Yes	0.00%	0.00%	0.00%	0.00%
92	No	-	-	0.00%	0.00%
93	No	0.00%	0.00%	0.00%	0.00%
94	No	0.00%	0.00%	0.00%	0.00%
95	Yes	-	-	-	-
103	Yes	-	-	-	-
105	Yes	-	-	-	-
115	Yes	-	-	-	-
120	No	-	-	-	-
150	Yes	-	-	-	-
154	Yes	-	-	-	-
160	No	-	-	-	-
163	No	0.43%	1.19%	2.16%	1.35%
BL	Yes	0.11%	0.06%	0.00%	0.14%
BR	Yes	0.24%	0.31%	1.23%	0.73%
GD	Yes	0.32%	0.08%	0.29%	0.44%
GR	Yes	0.54%	0.28%	0.49%	0.19%
LM	Yes	0.16%	0.00%	0.09%	0.16%
NV	Yes	0.94%	0.82%	0.40%	0.19%
OR	Yes	1.80%	0.98%	0.81%	0.44%
PK	Yes	0.85%	0.45%	0.42%	0.18%
PR	Yes	0.35%	0.29%	0.00%	0.00%
RD	Yes	1.62%	1.07%	1.53%	0.51%
SV	Yes	0.00%	0.03%	0.00%	0.00%
YW	Yes	0.03%	0.00%	0.02%	0.00%

Source: MDOT MTA

Figure 22: Core Bus Average Weekend Overcrowding Summary (Minority and Non-Minority Routes), April 2025



Vehicle Headway

Table 69 summarizes average published Core Bus headways. Core Bus headway standards dictate maximum headways for the AM Peak, Midday, PM Peak, Evening, and Weekend periods. Headways that exceed the maximum headway standard for the relevant service type and time period are highlighted in red.

Table 69: Core Bus Average Published Headways by Time Period, February 2025

Route	Minority Route	Average Headway (Minutes)					
		AM Peak	***Midday***	***PM Peak***	***Evening***	***Saturday***	***Sunday***
BL	Yes	14	14	14	22	23	26
BR	Yes	15	15	14	28	21	35
GD	Yes	9	9	10	19	22	21
GR	Yes	14	14	15	29	26	32
LM	Yes	12	12	12	22	25	25
NV	Yes	10	15	10	20	27	36
OR	Yes	9	13	10	21	21	25
PK	Yes	15	15	15	20	26	27
PR	Yes	10	14	9	21	23	40
RD	Yes	8	11	9	19	18	27
SV	Yes	11	14	11	19	25	25
YW	Yes	12	14	12	21	25	29
21	Yes	35	40	35	40	38	38

Route	Minority Route	Average Headway (Minutes)					
		AM Peak	*Midday*	*PM Peak*	*Evening*	*Saturday*	*Sunday*
22	Yes	8	11	10	25	27	38
26	Yes	13	15	15	28	38	41
28	Yes	13	24	15	27	27	60
29	Yes	18	30	19	37	40	60
30	Yes	11	14	13	27	26	47
31	Yes	20	28	23	26	30	43
32	No	34	35	35	44	60	60
33	Yes	35	39	41	39	60	60
34	Yes	38	45	46	45	60	60
36	Yes	30	40	32	38	44	70
37	Yes	25	25	23	40	34	34
38[37]	Yes	2 trips	2 trips	-	-	-	-
40	Yes	20	29	20	2 trips	-	-
51	No	31	48	30	44	50	52
52[38]	Yes	2 trips	-	1 trip	-	-	-
53	Yes	14	23	15	31	32	32
54	Yes	14	14	12	30	21	30
56	Yes	15	18	15	26	36	50
57	Yes	23	40	20	2 trips	40	40
59	Yes	34	51	50	63	64	60
62	No	30	43	30	39	61	60
63	No	34	50	30	49	42	44
65	No	26	43	19	36	44	44
67	No	38	42	40	68	47	42
69	Yes	49	60	51	53	66	75
70	No	49	58	50	59	62	82
71	Yes	23	39	32	44	37	36
73	Yes	34	42	36	46	46	46
75	Yes	32	43	34	43	58	54
76	No	20	25	20	29	46	47
77	Yes	26	30	26	30	47	47

[37] Supplemental service to high schools; augments regularly-scheduled service on routes that see high passenger volumes during peak periods. Does not operate on weekends or vacations when school is not in session.

[38] Limited AM and PM service for hospital shift workers.

Route	Minority Route	Average Headway (Minutes)					
		AM Peak	*Midday*	*PM Peak*	*Evening*	*Saturday*	*Sunday*
78	Yes	15	19	15	28	28	37
79	Yes	30	50	32	46	40	51
80	Yes	19	19	20	20	27	29
81	Yes	36	35	28	36	40	45
82	Yes	29	35	31	43	42	42
83	Yes	20	27	18	33	35	35
85	Yes	13	15	13	28	22	32
87	Yes	29	39	31	36	47	47
89	Yes	42	45	41	44	41	48
91	Yes	45	45	45	50	40	40
92[39]	No	17	-	23	1 trip	-	34
93	No	30	39	31	39	41	60
94	No	29	35	29	44	50	49
95	Yes	27	1 trip	30	33	-	-
103	Yes	28	-	28	-	-	-
105	Yes	16	-	18	-	-	-
115	Yes	30	-	20	2 trips	-	-
120	No	24	-	26	-	-	-
150	Yes	30	-	26	2 trips	-	-
154	Yes	9	-	12	-	-	-
160	No	35	-	10	-	-	-
163	No	24	52	17	42	35	36

Source: MDOT MTA

[39] School serving route. Limited service.

Table 70 summarizes this information across minority and non-minority routes. While some individual routes exceed headway standards, on average, across Core Bus service, minority and non-minority routes average headways are within - or a minute or two above, the established standards.

Table 70: Core Bus Average Headways: Minority and Non-Minority Routes Summary

	Average Published Headway (Minutes)					
	CityLink		Local Bus		Express Bus	
	Minority Routes	***Non-Minority Routes***	***Minority Routes***	***Non-Minority Routes***	***Minority Routes***	***Non-Minority Routes***
Weekday AM Peak	12	N/A	26	31	23	28
Weekday Midday	13	N/A	33	42	N/A	N/A
Weekday PM Peak	12	N/A	27	31	21	18
Weekday Evening	22	N/A	37	45	N/A	N/A
Saturday	24	N/A	41	50	N/A	N/A
Sunday	29	N/A	47	52	N/A	N/A

Source: MDOT MTA - GTFS

On-Time Performance

For all Core Bus routes, a bus is considered on-time or adhering to schedule if it departs a given timepoint between two minutes before and seven minutes after the scheduled departure time (the “on-time” range). Schedule performance is measured both by timepoint and by trip, and the target schedule performance rate for all routes across all time periods and day types is eighty percent (80%) on-time. **Table 71** shows weekday schedule performance by time period, timepoint, and trip all routes, while **Figure 23** and **Figure 24** detail schedule adherence performance by timepoint and trip, respectively. **Table 72, Figure 25**, and **Figure 26** summarizes this information across the weekend period. Schedule performance falling below sixty-five percent (65%)—the Core Bus threshold at which modification of a route should be considered—has been highlighted in red in these tables.

Overall, during April 2025, schedule performance was relatively lower when measured by trip as opposed to when measured by timepoint. Averaged across the two methods, schedule performance on weekdays on minority routes averaged seventy-nine percent (79%), while schedule performance on non-minority routes averaged seventy-eight percent (78%). During weekend periods, schedule performance on minority routes averaged seventy-four percent (74%), versus seventy-one percent (71%) on non-minority routes. By individual period, schedule performance on minority versus non-minority routes was relatively comparable or close to meeting the eighty percent (80%) target with some exceptions.

Table 71: Core Bus Weekday Schedule Performance by Time Period (by Timepoint and Trip), April 2025

Route	Minority Route	Schedule Performance											
		Early AM		AM Peak		Midday		PM Peak		Evening		Late Night	
		Time-point	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*
21	Yes	89%	89%	79%	78%	77%	77%	70%	69%	73%	73%	79%	75%
22	Yes	88%	88%	75%	74%	73%	72%	65%	63%	72%	72%	77%	78%
26	Yes	93%	93%	76%	76%	81%	81%	68%	65%	66%	66%	81%	80%
28	Yes	84%	83%	79%	78%	79%	79%	68%	68%	74%	74%	81%	80%
29	Yes	85%	85%	80%	80%	76%	76%	77%	76%	79%	79%	69%	72%
30	Yes	89%	89%	80%	81%	81%	81%	72%	71%	75%	75%	86%	82%
31	Yes	91%	91%	85%	85%	84%	84%	77%	78%	79%	79%	87%	87%
32	No	76%	76%	70%	70%	64%	64%	63%	63%	71%	71%	73%	74%
33	Yes	81%	81%	75%	75%	78%	77%	74%	74%	68%	69%	80%	80%
34	Yes	85%	85%	71%	70%	75%	75%	73%	71%	92%	92%	93%	93%
36	Yes	88%	89%	74%	74%	81%	81%	72%	71%	69%	69%	70%	70%
37	Yes	89%	89%	85%	86%	84%	83%	71%	71%	75%	75%	96%	96%
38	Yes	-	-	83%	83%	-	-	39%	39%	-	-	-	-
40	Yes	-	-	75%	76%	83%	83%	69%	68%	76%	76%	-	-
51	No	90%	89%	72%	72%	73%	73%	78%	78%	85%	85%	89%	83%
52	Yes	97%	97%	80%	79%	89%	89%	82%	81%	73%	74%	87%	87%
53	Yes	88%	88%	75%	76%	88%	87%	73%	72%	74%	74%	82%	79%
54	Yes	89%	89%	79%	77%	77%	77%	67%	66%	66%	66%	68%	73%
56	Yes	66%	65%	69%	69%	68%	68%	61%	60%	61%	61%	66%	59%
57	Yes	-	-	82%	82%	75%	75%	70%	72%	86%	86%	-	-
59	Yes	87%	87%	68%	71%	79%	79%	76%	77%	78%	78%	63%	63%
62	No	84%	84%	70%	70%	75%	75%	74%	75%	78%	79%	85%	86%
63	No	88%	88%	80%	80%	79%	78%	68%	67%	78%	76%	81%	77%
65	No	84%	84%	80%	80%	80%	80%	61%	60%	66%	66%	84%	84%
67	No	93%	93%	77%	77%	79%	79%	75%	75%	80%	80%	75%	75%
69	Yes	88%	88%	84%	84%	63%	63%	57%	57%	65%	65%	81%	76%
70	No	85%	85%	76%	77%	66%	66%	60%	59%	69%	68%	77%	69%
71	Yes	91%	91%	84%	83%	87%	87%	76%	76%	87%	87%	83%	82%
73	Yes	95%	95%	86%	86%	72%	72%	66%	66%	85%	85%	87%	83%
75	Yes	78%	80%	78%	78%	73%	73%	85%	84%	76%	75%	84%	77%
76	No	95%	95%	88%	88%	74%	75%	67%	67%	75%	75%	87%	87%
77	Yes	79%	80%	88%	88%	89%	89%	80%	81%	85%	84%	82%	79%
78	Yes	89%	89%	88%	88%	78%	78%	72%	72%	65%	65%	75%	72%
79	Yes	87%	87%	90%	91%	76%	76%	62%	62%	84%	85%	84%	79%
80	Yes	80%	80%	75%	74%	79%	79%	74%	74%	82%	81%	85%	82%
81	Yes	96%	96%	95%	95%	95%	95%	80%	80%	91%	91%	90%	90%
82	Yes	95%	95%	94%	94%	88%	88%	68%	68%	72%	71%	88%	84%

Route	Minority Route	Schedule Performance											
		Early AM		AM Peak		Midday		PM Peak		Evening		Late Night	
		Time-point	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*	*Time-point*	*Trip*
83	Yes	91%	91%	90%	90%	86%	86%	90%	90%	89%	89%	86%	85%
85	Yes	94%	94%	87%	87%	83%	83%	74%	75%	75%	75%	84%	81%
87	Yes	90%	90%	96%	96%	95%	95%	94%	94%	91%	91%	94%	90%
89	Yes	81%	81%	81%	81%	87%	87%	77%	76%	75%	75%	83%	85%
91	Yes	98%	98%	95%	95%	96%	96%	88%	88%	90%	90%	93%	95%
92	No	-	-	72%	76%	-	-	55%	51%	46%	50%	-	-
93	No	91%	90%	90%	90%	86%	85%	76%	76%	78%	79%	87%	87%
94	No	91%	90%	81%	82%	75%	74%	48%	53%	57%	57%	73%	71%
95	Yes	89%	89%	81%	81%	-	-	68%	68%	68%	68%	-	-
103	Yes	-	-	92%	92%	-	-	83%	83%	-	-	-	-
105	Yes	-	-	79%	79%	-	-	73%	72%	-	-	-	-
115	Yes	85%	85%	76%	76%	-	-	77%	74%	92%	92%	-	-
120	No	-	-	50%	51%	-	-	73%	73%	57%	57%	-	-
150	Yes	83%	83%	80%	81%	-	-	63%	62%	87%	87%	-	-
154	Yes	-	-	85%	85%	-	-	54%	53%	-	-	-	-
160	No	-	-	77%	76%	-	-	72%	73%	-	-	-	-
163	No	73%	73%	64%	65%	60%	60%	51%	51%	65%	65%	80%	75%
BL	Yes	79%	79%	71%	70%	79%	79%	56%	55%	67%	67%	74%	72%
BR	Yes	90%	90%	77%	78%	76%	76%	69%	68%	74%	74%	74%	74%
GD	Yes	92%	93%	82%	83%	75%	77%	78%	78%	80%	80%	75%	78%
GR	Yes	84%	85%	77%	77%	80%	80%	67%	68%	70%	70%	85%	85%
LM	Yes	90%	91%	80%	81%	83%	83%	67%	67%	77%	78%	81%	77%
NV	Yes	82%	82%	64%	64%	76%	76%	64%	63%	71%	71%	65%	69%
OR	Yes	79%	78%	74%	75%	76%	76%	69%	66%	66%	67%	63%	59%
PK	Yes	90%	90%	72%	72%	84%	84%	72%	73%	80%	80%	76%	73%
PR	Yes	95%	95%	86%	86%	84%	84%	79%	80%	76%	77%	78%	77%
RD	Yes	92%	92%	83%	82%	77%	77%	64%	64%	66%	66%	75%	78%
SV	Yes	90%	90%	73%	74%	71%	71%	63%	64%	69%	70%	81%	76%
YW	Yes	86%	86%	75%	75%	79%	79%	63%	64%	78%	78%	78%	73%

Source: MDOT MTA

Figure 23: Core Bus Weekday Schedule Performance by Timepoint (Minority and Non-Minority Routes Summary), April 2025

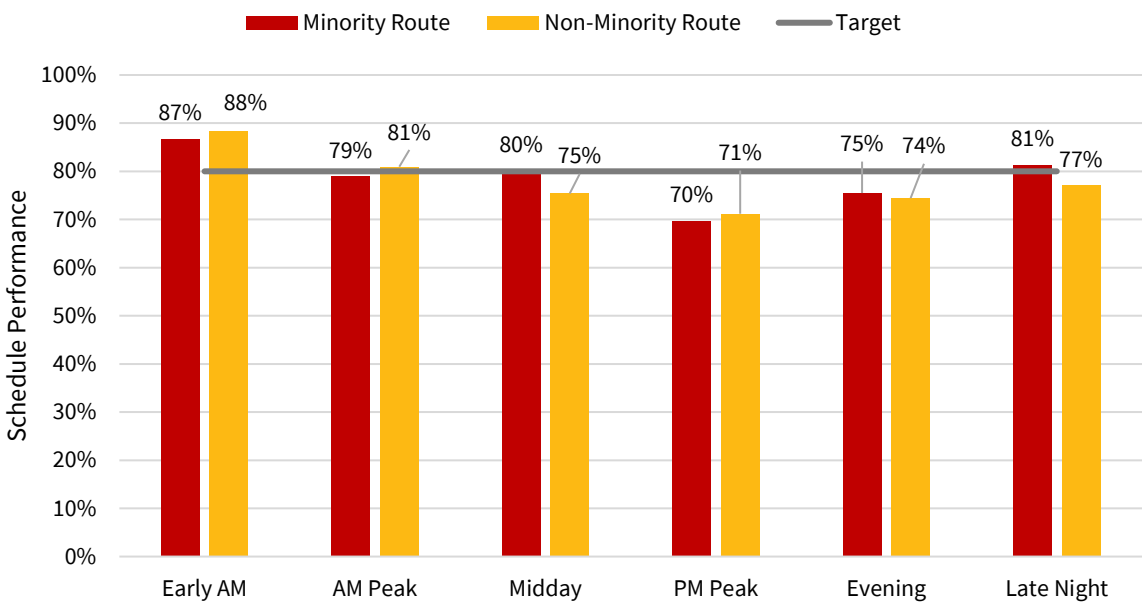


Figure 24: Core Bus Weekday Schedule Performance by Trip (Minority and Non-Minority Routes Summary), April 2025

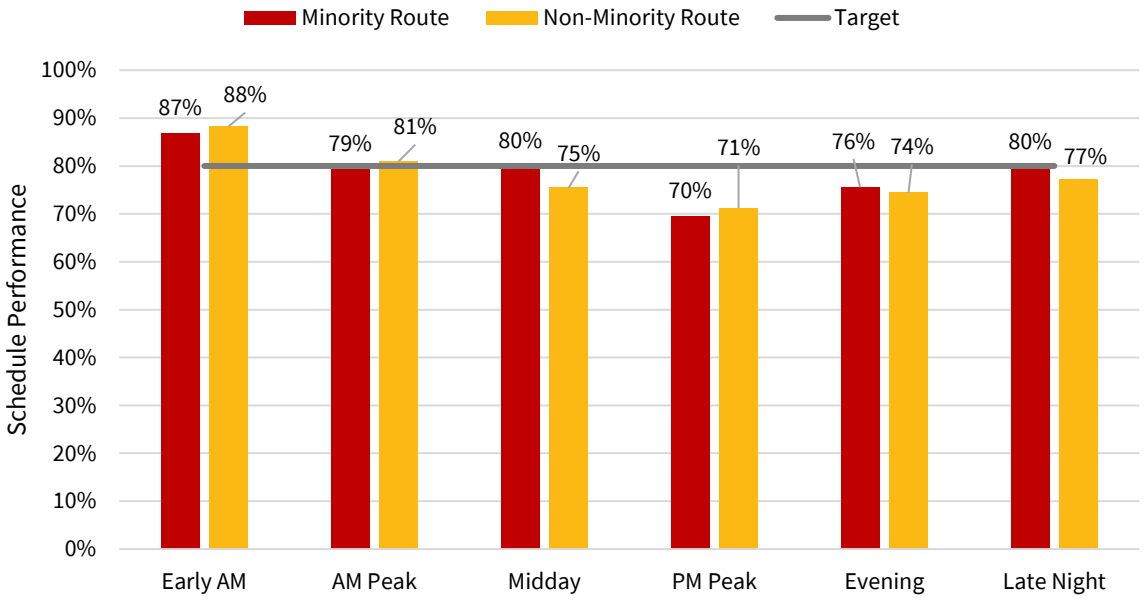


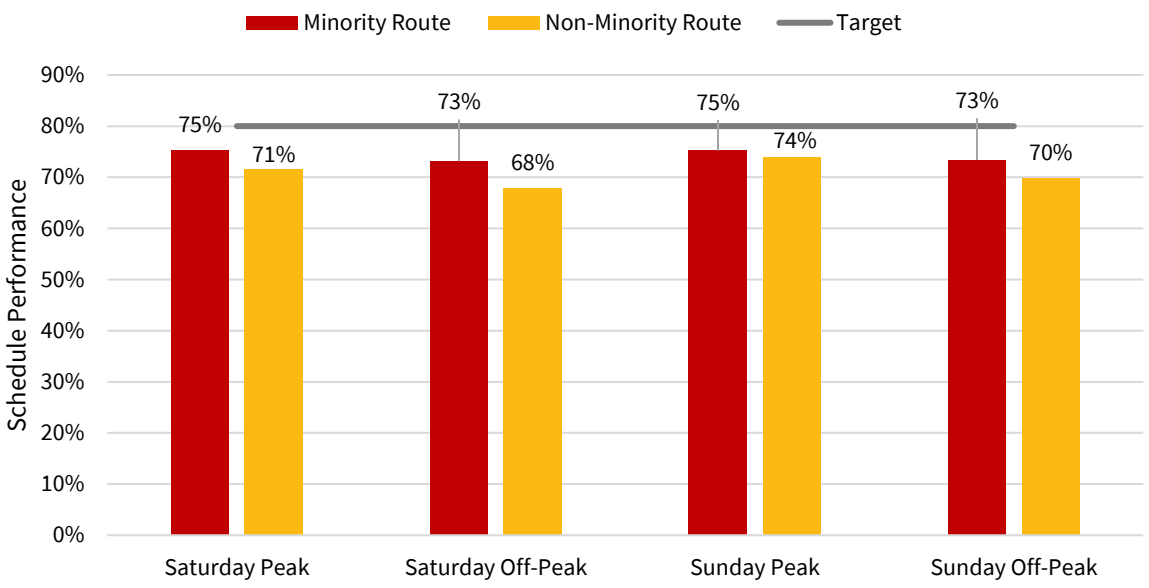
Table 72: Core Bus Weekend Schedule Performance by Time Period (by Timepoint and Trip), April 2025

Route	Minority Route	Schedule Performance							
		Saturday Peak		Saturday Off-Peak		Sunday Peak		Sunday Off-Peak	
		Timepoint	*Trip*	*Timepoint*	*Trip*	*Timepoint*	*Trip*	*Timepoint*	*Trip*
21	Yes	74%	74%	74%	74%	67%	66%	65%	64%
22	Yes	66%	66%	65%	63%	59%	59%	67%	69%
26	Yes	66%	65%	77%	77%	78%	79%	65%	63%
28	Yes	78%	77%	73%	73%	71%	70%	69%	69%
29	Yes	79%	77%	72%	71%	59%	59%	67%	67%
30	Yes	76%	75%	74%	74%	75%	74%	74%	73%
31	Yes	78%	78%	86%	87%	76%	78%	85%	86%
32	No	74%	74%	69%	68%	71%	71%	69%	70%
33	Yes	53%	53%	63%	62%	66%	66%	77%	77%
34	Yes	71%	71%	82%	82%	66%	67%	68%	67%
36	Yes	65%	66%	63%	62%	53%	54%	66%	65%
37	Yes	78%	75%	73%	74%	70%	70%	74%	75%
38	Yes	-	-	-	-	-	-	-	-
51	No	68%	68%	80%	79%	73%	75%	74%	75%
52	Yes	89%	89%	83%	84%	86%	86%	83%	82%
53	Yes	75%	76%	72%	72%	75%	76%	76%	75%
54	Yes	84%	83%	71%	71%	78%	78%	72%	73%
56	Yes	58%	59%	58%	58%	68%	70%	54%	58%
57	Yes	85%	84%	92%	92%	85%	85%	71%	73%
59	Yes	81%	82%	71%	71%	66%	64%	65%	64%
62	No	88%	87%	70%	72%	74%	74%	69%	69%
63	No	76%	77%	81%	80%	77%	77%	71%	69%
65	No	66%	67%	76%	75%	86%	87%	81%	80%
67	No	74%	74%	70%	69%	84%	84%	85%	85%
69	Yes	70%	69%	61%	62%	69%	68%	63%	64%
70	No	56%	58%	50%	52%	62%	60%	47%	48%
71	Yes	69%	70%	71%	72%	84%	83%	80%	79%
73	Yes	86%	86%	76%	75%	83%	83%	81%	81%
75	Yes	62%	61%	67%	67%	76%	76%	53%	52%
76	No	63%	63%	68%	67%	80%	79%	85%	83%
77	Yes	82%	82%	78%	79%	90%	89%	70%	71%
78	Yes	80%	81%	81%	80%	79%	79%	78%	79%
79	Yes	88%	88%	84%	85%	85%	85%	81%	78%
80	Yes	79%	79%	78%	78%	75%	75%	73%	73%
81	Yes	86%	86%	80%	80%	90%	90%	84%	84%
82	Yes	86%	84%	89%	88%	88%	88%	80%	79%
83	Yes	83%	83%	74%	74%	74%	75%	79%	80%
85	Yes	85%	86%	82%	81%	85%	85%	84%	84%

Route	Minority Route	Schedule Performance							
		Saturday Peak		Saturday Off-Peak		Sunday Peak		Sunday Off-Peak	
		Timepoint	*Trip*	*Timepoint*	*Trip*	*Timepoint*	*Trip*	*Timepoint*	*Trip*
87	Yes	84%	85%	78%	79%	87%	87%	91%	92%
89	Yes	80%	80%	78%	78%	77%	78%	82%	82%
91	Yes	81%	81%	64%	62%	90%	90%	90%	90%
92	No	-	-	-	-	67%	75%	66%	67%
93	No	68%	68%	71%	72%	71%	70%	78%	78%
94	No	55%	55%	55%	55%	61%	60%	56%	58%
95	Yes	-	-	-	-	-	-	-	-
103	Yes	-	-	-	-	-	-	-	-
105	Yes	-	-	-	-	-	-	-	-
115	Yes	-	-	-	-	-	-	-	-
120	No	-	-	-	-	-	-	-	-
150	Yes	-	-	-	-	-	-	-	-
154	Yes	-	-	-	-	-	-	-	-
160	No	-	-	-	-	-	-	-	-
163	No	63%	64%	68%	67%	75%	74%	73%	72%
BL	Yes	68%	69%	64%	63%	64%	65%	63%	63%
BR	Yes	79%	78%	66%	67%	73%	72%	74%	74%
GD	Yes	68%	69%	74%	74%	74%	75%	76%	77%
GR	Yes	77%	78%	69%	69%	84%	85%	76%	76%
LM	Yes	76%	76%	70%	71%	74%	73%	63%	65%
NV	Yes	66%	66%	64%	64%	71%	69%	73%	72%
OR	Yes	73%	73%	67%	67%	62%	62%	58%	58%
PK	Yes	73%	72%	73%	71%	75%	75%	71%	70%
PR	Yes	84%	84%	81%	82%	71%	72%	74%	73%
RD	Yes	68%	68%	64%	65%	70%	70%	62%	61%
SV	Yes	63%	62%	56%	55%	73%	74%	69%	66%
YW	Yes	76%	75%	71%	70%	70%	70%	69%	67%

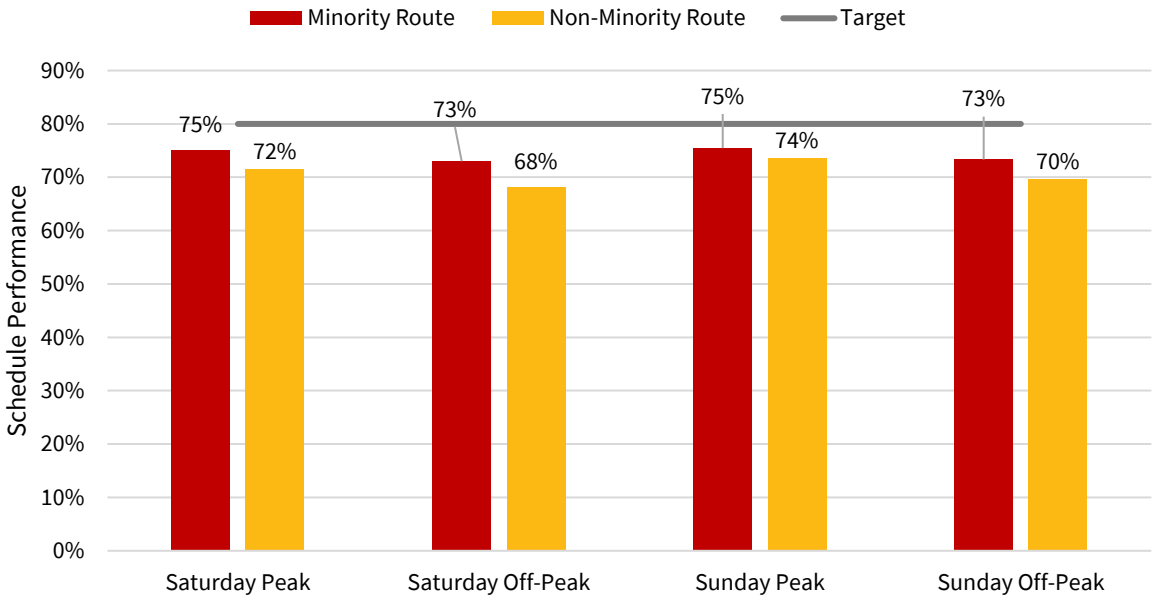
Source: MDOT MTA

Figure 25: Core Bus Weekend Schedule Performance by Timepoint (Minority and Non-Minority Routes Summary), April 2025



Source: MDOT MTA

Figure 26: Core Bus Weekend Schedule Performance by Trip (Minority and Non-Minority Routes Summary), April 2025



Source: MDOT MTA

Analysis of Service Policies

This section analyzes MDOT MTA service policies among minority and non-minority routes.

Transit Amenities

MDOT MTA provides bus shelters, real-time information displays, fare machines, and covered bicycle racks as Core Bus transit amenities. Of 4,167 total stops, 2,398 are located in Core Bus minority Block Groups; 1,769 are located in Core Bus non-minority Block Groups. As fare machines are only provided at transfer centers (generally connecting to rail stations, some of which are outside the Core Bus service area), a comparison showing provision across bus stops does not yield meaningful results. In addition, MDOT MTA does not currently track the locations of covered bicycle racks; however, this section does examine the locations of MDOT MTA-installed bicycle lockers.

Bus Shelters

The Core Bus system currently has 668 bus shelters spread among CityLink, Local Bus, and Express Bus bus stops. Of these shelters, 411 (roughly sixty-two percent (61.52%)) are located in Core Bus minority Census Block Groups, while 257 (roughly thirty-eight percent (38.47%)) are located in non-minority Block Groups. MDOT MTA's Bus Stop shelter placement policy developed for the MDOT MTA Bus Stop Design Guide, scores bus stop locations to determine if the site is eligible for a shelter based on several criteria, namely: number of boardings and transfers; frequency of the route(s), if the route(s) is a Title VI designated route, if a stop serves nearby human services, and if it serves as an operator relief location.

Bus Shelter Eligibility

As of 2025, the Core Bus system had 370 stops without shelters with bus shelter eligibility scores greater than 100. Of the 370 stops, 5 were In Progress. **Table 73** shows the results of a bus shelter eligibility analysis for minority versus non-minority stop locations.

Table 73: Bus Shelter Eligibility Analysis

	Number of Stops		Percent of Total Stops	
	Minority Block Groups	**Non-Minority Block Groups**	**Minority Block Groups**	**Non-Minority Block Groups**
Total Stops	2,398	1,769	58%	42%
Bus Stops with Shelter	411	257	62%	38%
Bus Stops with Eligibility Score x >100	644	250	15%	6%
Existing	380	238	9%	6%
In Progress	9	11	0.22%	0.26%

Source: MDOT MTA – Stop Scoring 2025

Real-Time Information Displays

Table 74 summarizes the locations of real-time information displays within the Core Bus system, including the number of displays available at each site. Real-time displays are available at 11 sites in all, seven of which (nearly sixty-four percent (63.64%) are located in Core Bus minority Block Groups.

Table 74: Core Bus Distribution of Real-Time Information Displays

Location	Transfer Center Type	Located Within Minority Block Group	Real-Time Displays
West Baltimore MARC Station	Tier I: Off-Street	Yes	9
Penn Station	Tier I: Off-Street	Yes	1
State Center Metro Station	Tier II: On-Street	Yes	4
Lexington Market Metro Station	Tier II: On-Street	Yes	2
Charles Center Metro Station	Tier II: On-Street	No	2
North Avenue Light Rail Station	Tier II: On-Street	No	2
Penn-North Metro Station	Tier II: On-Street	Yes	1
Mondawmin Metro Station	Tier I: Off-Street	Yes	3
Eastern Avenue and 54th Street	Tier II: On-Street	No	1
Bayview Boulevard at Johns Hopkins	Tier II: On-Street	Yes	1
Pratt Street and Market Place	Tier II: On-Street	No	1

Source: MDOT MTA 2022

Covered Bicycle Racks

The MDOT MTA Bus Stop Design Guide lists covered bicycle racks as a provided amenity. MDOT MTA does not currently track the locations of covered bicycle racks at stops or transit stations. However, MDOT MTA does track the locations of bicycle racks and bicycle lockers at rail stations. Specifically, MDOT MTA tracks the presence of bicycle racks, but not the ownership or installation circumstances associated with racks. Regarding bicycle lockers, MDOT MTA tracks locations of agency-installed or owned bicycle lockers. **Table 75** summarizes distribution of bicycle racks and lockers across rail stations where Core Bus service is provided. Bike racks tend to be present at rail stations where Core Bus service is provided located in minority Block Groups compared to non-minority Block Groups (14 stations). Among five rail stations with Core Bus service where bicycle lockers are provided, all stations are located in minority Block Groups.

Table 75: Core Bus Distribution of Bicycle Racks and Lockers

Location	Located Within Minority Block Group	Bicycle Racks Present	Number of MDOT MTA Bicycle Lockers
Baltimore Highlands Light Rail Stop	Yes	Y	-
BWI Airport Light Rail Stop	Yes	Y	-
BWI Business District Light Rail Stop	No	Y	10
BWI Marshall MARC/Amtrak Station	No	Y	28
Camden Yards Light Rail Stop	No	Y	-
Cherry Hill Light Rail Stop	Yes	N	-
Cromwell/Glen Burnie Light Rail Stop	No	Y	10
Falls Road Light Rail Stop	No	Y	8
Ferndale Light Rail Stop	No	Y	-
Halethorpe MARC Station	No	Y	-
Hunt Valley Light Rail Stop	No	Y	-
Lexington Market Light Rail Stop	Yes	N	-
Lexington Metro Station	Yes	Y	-
Lutherville Light Rail Stop	No	Y	-
Martin State Airport MARC Station	No	Y	10
Milford Mill Metro Station	Yes	Y	-
Mount Washington Light Rail Stop	No	Y	-
Mt Royal Light Rail Stop	Yes	Y	-
North Avenue Light Rail Stop	No	Y	-
North Linthicum Light Rail Stop	No	Y	-
Old Court Metro Station	Yes	Y	-
Owings Mills Metro Station	Yes	Y	-
Patapsco Light Rail Stop	Yes	Y	-
Penn Station	Yes	Y	-
Penn-North Metro Station	Yes	Y	-
Reisterstown Plaza Metro Station	Yes	Y	-
Rogers Avenue Metro Station	Yes	Y	-
Fairgrounds Light Rail Stop	No	Y	-
Timonium Light Rail Stop	Yes	Y	-
Upton/Avenue Market Metro Station	Yes	Y	-
West Baltimore MARC Station	Yes	Y	-
West Cold Spring Metro Station	Yes	Y	-
Westport Light Rail Stop	No	N	-
Woodberry Light Rail Stop	Yes	Y	-

Source: MDOT MTA **Facility Inventory 2025**

Fare Machines

MDOT MTA has ticket vending machines located at the following sites, many of which are served by Core Bus:

- MDOT MTA Transit Store: 6 St. Paul Street, Baltimore, MD 21202.
- Penn North and West Baltimore MARC transit bus loops.
- All Metro Subway stations.
- All Light Rail stations.
- All MARC Penn Line stations except Seabrook Station
- MARC Camden Line stations:
    - Camden Station
    - Dorsey Station
    - Laurel Station
    - Savage Station
    - College Park
- MARC Brunswick Line stations:
    - Brunswick Station
    - Gaithersburg Station
    - Germantown Station
    - Kensington Station
    - Martinsburg Station
    - Monocacy Station
    - Metropolitan Grove
    - Point of Rocks
    - Rockville Station
    - Silver Spring Station

Vehicle Assignment

MDOT MTA's vehicle assignment policy is to distribute Core Bus vehicles relatively evenly among the four bus divisions with an aim to keep the average fleet age at each division as equal as possible, and as close as possible to the system average vehicle age. This ensures that no one division has a predominantly new or old fleet at a given time. The Bus Transportation unit assigns buses to routes and operators. Assignment is often based on estimated route ridership by time of day; thus, vehicle size plays a role in vehicle assignment.

Because many routes originate out of multiple divisions across a given timeframe,

Table 76 summarizes the percentage of revenue hours traveled by minority routes originating from each division during April 2025. This information is presented alongside the average vehicle age at each division (weighted by revenue hours), which is compared to the average system vehicle age, 6.52 years.

Table 76: Core Bus Vehicle Assignment Statistics by Division, April 2025

Bus Division	Percent Minority Route Revenue Hours Originating at Division	Average Vehicle Age (Years, Weighted by Revenue Hours)	Average Core Bus System Vehicle Age (Years, Weighted by Revenue Hours)
Bush	69.08%	7.64	6.52
Eastern	60.58%	6.24	
Kirk	71.96%	5.73	
Northwest	78.23%	6.15	

Source: MDOT MTA

The Eastern division, which originated the relative lowest share of bus revenue hours to minority routes during this time period (approximately sixty percent (60.58%)), had the second-oldest average weighted vehicle age, 6.24 years. The Northwest division, which originated the highest share of bus revenue hours to minority routes (over seventy-eight percent (78.23%), had an average weighted vehicle age of 6.15 years. The Bush and Eastern divisions with the lower percent of revenue hours of minority routes had the higher weighted average vehicle ages, while the Kirk and Northwest divisions with higher percentage of revenue hours for minority routes had lower weighted vehicle ages.

While MDOT MTA's vehicle assignment policy does not consider minority route status as a factor, **Table 77** shows Core Bus vehicle assignment by route for April 2025, summarized by average vehicle age (weighted by the number of revenue hours in operation).

Table 77: Core Bus Average Vehicle Age by Route

Route	Minority Route	Average Vehicle Age (Years, Weighted by Revenue Hours)
BL	Yes	6.88
BR	Yes	7.56
GD	Yes	6.68
GR	Yes	6.12
LM	Yes	6.29
NV	Yes	7.06
OR	Yes	6.28
PK	Yes	6.55
PR	Yes	7.49
RD	Yes	5.26
SV	Yes	6.94
YW	Yes	5.73
21	Yes	5.55
22	Yes	6.21
26	Yes	8.04
28	Yes	6.48

Route	Minority Route	Average Vehicle Age (Years, Weighted by Revenue Hours)
29	Yes	7.82
30	Yes	5.88
31	Yes	6.49
32	No	8.27
33	Yes	4.93
34	Yes	6.14
36	Yes	5.97
37	Yes	5.98
38	Yes	8.08
51	No	4.78
52	Yes	7.25
53	Yes	5.57
54	Yes	5.40
56	Yes	6.97
57	Yes	6.05
59	Yes	5.46
62	No	5.44
63	No	5.34
65	No	7.43
67	No	7.71
69	Yes	7.73
70	No	7.45
71	Yes	9.21
73	Yes	8.81
75	Yes	6.72
76	No	6.79
77	Yes	6.37
78	Yes	7.60
79	Yes	6.36
80	Yes	6.87
81	Yes	6.51
82	Yes	6.42
83	Yes	5.59
85	Yes	6.31
87	Yes	6.12
89	Yes	5.84

Route	Minority Route	Average Vehicle Age (Years, Weighted by Revenue Hours)
91	Yes	5.74
92	No	6.65
93	No	5.21
94	No	6.70
95	Yes	9.30
103	Yes	6.89
105	Yes	5.99
115	Yes	8.55
120	No	5.40
150	Yes	6.49
154	Yes	6.58
160	No	4.60
163	No	6.50

Source: MDOT MTA

Finally, **Table 78** shows current Core Bus average vehicle age by service type and minority status. As demonstrated, the average weighted age of vehicles in use on minority routes on a given service type is similar for non-minority routes on the same service type.

Table 78: Core Bus Average Vehicle Age by Service Type and Minority Status

Service Type	Minority Routes Average Vehicle Age (Years, Weighted by Revenue Hours)	Non-Minority Routes Average Vehicle Age (Years, Weighted by Revenue Hours)
CityLink	6.57	-
Local Bus	6.64	6.52
Express Bus	6.90	5.50

Source: MDOT MTA

Commuter Bus

Commuter Bus Service Standards

Vehicle Load

While MDOT MTA Commuter Bus contractors may use different vehicles, all vehicles hold a minimum of 55[40] seated passengers and are approximately 45 feet. Although unlikely to occur, Commuter Bus service permits standees only on the final trip of a service day if there is a full seated load or during these extenuating circumstances: 1) to accommodate passengers from another bus that has become disabled en-route; or 2) in emergency situations such as severe inclement weather or civil defense events. On all other trips, the maximum load standard is 1.0.

Vehicle Headway

Vehicle headway signifies the amount of time between two vehicles traveling in the same direction on a given line.

Commuter Bus primarily operates peak direction, peak hour service (rather than bidirectional service). Historically, during all service periods, the maximum headway in the direction of travel was 30 minutes; however, following the July 2024 service changes, this standard was replaced with a new standard to maintain three trips in the peak direction in the peak period on weekdays, for a minimum of three round trips per weekday.

On-Time Performance

Commuter Bus vehicles are considered on-time if departing the first stop of a route within a time window of one minute and 59 seconds early to six minutes and 59 seconds late. On-time performance under new Commuter Bus contracts is measured using departure times from all AM and PM stops. A stop is considered on time if the coach departs the stop less than two (2) minutes before the scheduled departure time or less than seven (7) minutes after the scheduled departure time. The Commuter Bus on-time performance target is ninety-five percent (95%) on-time.

[40] As of June 1, 2023, new contracts require vehicles to hold a minimum of 50 seated passengers.

Commuter Bus Service Policies

Transit Amenities

Commuter Bus aims to provide the following items at agency-owned Park & Ride facilities:

- Bus shelters
- Benches
- Schedule and information cases
- Reserved ADA parking
- Bicycle racks
- Bicycle lockers
- Lighting
- Striping
- Paved areas

However, MDOT MTA does not own the majority of the Park & Ride facilities in its Commuter Bus system, and thus does not control provision of the majority of transit amenities at Commuter Bus stops. In addition, MDOT MTA specifies in its Commuter Bus vehicle assignment policy that all contractor-provided vehicles must have properly functioning, operable air conditioning and heating units, and must maintain a comfort level of 68 to 72 degrees Fahrenheit inside the coach whenever passengers are on board. Further, all vehicles must have upholstered high back seats, functioning restrooms, operable overhead reading lights for each seat, and wheelchair lifts that are in full compliance with the Americans with Disabilities Act (ADA). All buses are equipped with Wi-Fi and seatbelts.

Vehicle Assignment

MDOT MTA's Commuter Bus service is provided via contracted operations. The agency's policy for contractor-provided equipment is as follows:

- The contractor is responsible for providing lift-equipped buses for all Commuter Bus runs.
- The contractor is required to use buses with a 55-passenger capacity or larger over-the- road (OTR) type buses for Commuter Bus service.
- The contractor is responsible for the provision of backup (spare) transit vehicles as necessary in the event that a vehicle becomes inoperative or is out-of-service for maintenance.

MDOT MTA's policy for vehicle type is as follows:

- The contractor shall provide over-the-road vehicles measuring a minimum of 45 feet in length with seating capacity for 55 people. New contracts require seating capacity for 50 people.
- While some contracts may have more stringent age or mileage requirements, MDOT MTA's policy is that no contractor-owned vehicle be more than seven (7) years of age or have more than 800,000 odometer miles during the life of a contract. While this is not the case for all current contracts, as contracts are renewed, MDOT MTA includes language requiring a maximum vehicle age of seven years.
- Vehicles are required to have properly functioning, operable air conditioning and heating units, and must maintain a comfort level of 68 to 72 degrees Fahrenheit inside the coach whenever passengers are on board. Further, all vehicles shall have upholstered high back seats, functioning restrooms, operable overhead

reading lights for each seat, and wheelchair lifts that are in full compliance with the Americans with Disabilities Act (ADA).

- All vehicles must have communication capabilities and be equipped with fully functioning GTFS-RT/GPS systems that communicate to the main offices of the contractor and which can be forwarded to the MDOT MTA Saucon website for the purposes of tracking on-time performance and service reliability.
- The Contractor shall assign coaches to all trips in its dispatch system prior to operating service. If there are any changes in dispatch, that asset change must be reflected no later than 15 minutes prior to the start of the trip.
- School buses or modified van-type vehicles are not acceptable for Commuter Bus service.

MDOT MTA requires each contractor to provide a list of buses, including the year, make, and model of all vehicles. From this list, MDOT MTA is able to verify that each contractor is using buses on routes that meet the requirements of the contract. Because contractor buses may not be dedicated solely to Commuter Bus service, MDOT MTA does not require that contractor-owned buses be assigned to a specific route. However, they must still be in dispatch at least 15 mins prior to the start of the trip.

Commuter Bus Transit Service Monitoring

Analysis of Service Standards

Vehicle Load

Commuter Bus vehicle capacity is not to exceed 55 passengers, the seating capacity on a typical service vehicle. Thus, the vehicle load factor on a Commuter Bus should not exceed 1.0. **Table 79** summarizes average load factor on Commuter Bus routes in January 2025, calculated by dividing average trip ridership by 55. The average load factor on minority routes during this time period was 0.39; the average load factor on non-minority routes was 0.33. Neither minority nor non-minority routes came close to not meeting the Commuter Bus load factor standard.

Table 79: Commuter Bus Average Load Factor, October 2022

Commuter Bus Route	Minority Route	Average Weekday Load	Average Weekend Load
201	Yes	0.15	0.11
203	Yes	0.39	-
204	Yes	0.61	-
210	No	0.12	-
215	Yes	0.20	-
220	No	0.28	-
230	No	0.38	-
240	No	0.29	-
250	No	0.34	-
260	No	0.32	-
305	Yes	0.45	-

Commuter Bus Route	Minority Route	Average Weekday Load	Average Weekend Load
310	Yes	0.38	-
315	Yes	0.35	-
320	Yes	0.33	-
325	Yes	0.25	-
335	No	0.60	-
345	Yes	0.34	-
410	No	0.22	-
411	No	0.22	-
420	No	0.21	-
505	Yes	0.32	-
515	Yes	0.40	-
610	Yes	0.45	-
620	Yes	0.44	-
630	Yes	0.50	-
640	Yes	0.47	-
650	Yes	0.60	-
705	Yes	0.52	-
715	Yes	0.41	-
725	No	0.47	-
735	Yes	0.43	-
810	Yes	0.17	-
820	Yes	0.46	-
830	No	0.50	-
840	No	0.40	-
850	Yes	0.37	-

Source: MDOT MTA

Vehicle Headways

The Commuter Bus standard calls for service to maintain three trips in the peak direction in the peak period on weekdays, for a minimum of three round trips per weekday. **Table 80** shows actual Commuter Bus published trip counts on minority and non-minority routes during AM and PM periods (all trips are included, which may fall outside of the defined Peak periods). The data used for comparison was Spring 2025, which is already one year after the Commuter Bus service change that was adapted in Summer 2024. Thus, instead of comparing the commuter bus headway against the service standard developed during the 2023 Title VI Program, the project team compare the service level to the latest service standard that was developed during this program year. Under the new standard, each commuter bus route need to maintain three trips in the peak direction in the peak period on weekdays, for a minimum of three round trips per weekday every route has at least three scheduled trips in each direction. **Table 81**

shows average AM and PM trip counts for minority and non-minority routes. On average, all routes meet the three-trip standard, regardless of minority status.

Table 80: Commuter Bus Average Published Trips by Time Period

Commuter Bus Route	Minority Route	Average Headways (Trips per Period)	
		AM Trips	PM Trips
201	Yes	3	4
203	Yes	3	3
204	Yes	3	3
210	No	3	3
215	Yes	3	3
220	No	7	7
230	No	6	8
240	No	3	4
250	No	6	6
260	No	3	4
305	Yes	4	4
310	Yes	4	5
315	Yes	4	4
320	Yes	4	5
325	Yes	3	3
335	No	4	4
345	Yes	4	5
410	No	3	3
411	No	3	3
420	No	4	4
505	Yes	4	6
515	Yes	6	6
610	Yes	11	11
620	Yes	11	11
630	Yes	8	6
640	Yes	5	5
650	Yes	7	7
705	Yes	9	8
715	Yes	6	8
725	No	3	3
735	Yes	4	5
810	Yes	3	3
820	Yes	9	10

Commuter Bus Route	Minority Route	Average Headways (Trips per Period)	
		AM Trips	PM Trips
830	No	4	6
840	No	7	7
850	Yes	3	3

Source: MDOT MTA GTFS

Table 81: Commuter Bus Average Published Headways: Minority and Non-Minority Routes Summary

Time Period	Average Trip Counts	
	Minority Routes	Non-Minority Routes
AM Trips	5.5 trips	4.2 trips
PM Trips	5.8 trips	4.6 trips

Source: MDOT MTA

On time Performance

The Commuter Bus on-time performance target is ninety-five percent (95%) on-time. Table 82 shows average on-time performance on all Commuter Bus routes from April 2025. Commuter Bus on-time performance is reported on an aggregate/daily level rather than by period. Routes showing on-time performance below seventy-five percent (75%), twenty percent (20%) below the agency standard were flagged in the table in red. Out of the routes flagged, 11 were minority routes, and three were non-minority routes. Overall, on-time performance on minority routes was slightly lower on minority routes than on non-minority routes, at seventy-five percent (75%) and eighty percent (80%) respectively, but both on-time performance averages met the seventy-five percent (75%) standard.

Table 82: Commuter Bus On-Time Performance, April 2025

Commuter Bus Route	Minority Route	On-Time Performance
201	Yes	63%
203	Yes	85%
204	Yes	51%
210	No	78%
215	Yes	73%
220	No	81%
230	No	82%
240	No	73%
250	No	77%
260	No	74%
305	Yes	68%
310	Yes	74%
315	Yes	75%
320	Yes	72%
325	Yes	71%
335	No	69%
345	Yes	71%
410	No	88%
411	No	91%
420	No	86%
505	Yes	85%
515	Yes	87%
610	Yes	67%
620	Yes	67%
630	Yes	72%
640	Yes	75%
650	Yes	85%
705	Yes	79%
715	Yes	80%
725	No	86%
735	Yes	88%
810	Yes	72%
820	Yes	75%
830	No	83%
840	No	75%
850	Yes	90%

Source: MDOT MTA

Analysis of Service Policies

Transit Amenities

MDOT MTA Commuter Bus service serves a total of 53 Park & Ride lots. Ten of these lots are at least partially agency-owned and subject to Title VI Program policies. **Table 83** summarizes the transit amenities at each of these ten lots. One lot (ten percent (10.00%)), Dorsey MARC Station, is located within a Commuter Bus minority block group. Six of the 10 lots (sixty percent (60.00%)) have all eight amenities. Bike racks or lockers are present at seven lots, and all ten lots have ADA accessibility to the Commuter Bus stop.[41]

Table 83: Transit Amenities at MDOT MTA-Owned Commuter Bus Park & Ride Lots

Park & Ride Lot	Located Within Minority Block Group	Owner(s)	Bus Shelter	Bench	ADA Parking	ADA Accessible to Stop	Bike Racks/ Lockers	Lighting	Striping	Paved
Cromwell/ Glen Burnie Lt. Rail Station	No	MDOT MTA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Dorsey MARC Station	Yes	MDOT MTA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Dunkirk	No	MDOT MTA / Calvert County	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Golden Beach	No	St. Mary's County	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
La Plata	No	MDOT MTA / Town of La Plata	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Monocacy MARC Station	No	MDOT MTA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Prince Frederick	No	Calvert County	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Severna Park	No	MDOT MTA	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Waldorf	No	MDOT MTA / Charles County	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
White Marsh	No	MDOT MTA	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes

[41] Although the Commuter Bus transit amenities policy does not include ticket vending machines, passengers may buy Commuter Bus 10-trip and monthly tickets at MARC, Metro Subway or Light Rail ticket vending machines. Commuter Bus riders may purchase one-way, and 31-day passes directly from their smartphone on the CharmPass mobile transit fare app.

Vehicle Assignment

Contractors provide MDOT MTA's Commuter Bus service and own the Commuter Bus vehicles. As such, vehicle assignment is completed at contractors' discretion, and assessment of minority route versus non-minority route vehicle assignment is not possible.

Contractors often use various vehicles in their fleet to complete runs on individual routes. For example, a vehicle that provides service on a non-minority route one day may provide service on a minority route the next day. These decisions are made by the contractor providing the service, based on the vehicles available for service and driver preferences on each given service day. Older MDOT MTA contracts do stipulate that no vehicle older than 10 years may be used for Commuter Bus service; however, new contracts stipulate that no vehicle older than six years may be used for Commuter Bus Service. To ensure compliance, MDOT MTA staff conduct periodic site visits to contractor sites that include visual inspections of in-service vehicles. MDOT MTA also employs staff to supervise Commuter Bus daily service.

Several of the older contracts that will expire in June 2025 allow for buses that are 2014 or newer making them currently nine years old. Contractors found out of compliance with the vehicle age requirement are notified that these vehicles must be taken out of service to comply with the contract.

Vehicle Cleanliness and Comfort

In the 2019 Customer Satisfaction Study[42], the most recent study available, Commuter Bus respondents were asked to rate, on a scale of 1 to 5, cleanliness and comfort of the internal temperature of the vehicle on which they were riding at the time they were surveyed. **Table 84** summarizes the results of this analysis on the nine total routes receiving responses, including among minority versus non-minority riders.

Regarding vehicle cleanliness, the average rating on minority Commuter Bus routes was 3.79; on non-minority routes, the average rating was 3.80. The average rating among minority respondents on this metric was 3.89; among non-minority respondents, it was 3.81.

Regarding vehicle temperature, the average rating on minority Commuter Bus routes was 3.49; on non-minority routes, the average rating was 3.50. The average rating among minority respondents on this metric was 3.46; among non-minority respondents, it was 3.51.

These results show little disparity between how cleanliness or vehicle internal temperature was rated on minority versus non-minority Commuter Bus routes as well as among minority versus non-minority riders on Commuter Bus routes.

Table 84: Commuter Bus Rider Vehicle Ratings

[42] The 2025 Customer Satisfaction Study did not provide a disaggregated analysis of cleanliness and comfort ratings by minority and non-minority populations. As a result, this section retains findings from the 2019 Customer Satisfaction Study to represent vehicle cleanliness and comfort conditions.

Route	Minority Route	Vehicle Cleanliness Rating			Comfort of Internal Temperature Rating		
		All Riders	Minority Riders	Non-Minority Riders	All Riders	Minority Riders	Non-Minority Riders
201	Yes	4.25	4.67	4.00	3.75	3.67	4.00
203	Yes	3.82	3.97	3.66	3.38	3.50	3.30
204	Yes	3.57	3.73	3.62	3.30	3.50	3.17
210	No	3.89	4.08	4.09	3.71	3.00	4.50
215	No	3.74	3.53	3.82	3.31	3.20	3.17
310	Yes	3.66	3.67	3.84	3.25	4.00	3.17
320	Yes	3.63	3.61	3.71	3.29	3.63	2.67
335	Yes	3.82	4.03	3.74	4.00	4.00	4.00
410	No	3.60	3.73	3.79	3.18	2.64	3.64
Averages		3.77	3.89	3.81	3.46	3.46	3.51

Source: MDOT MTA Customer Satisfaction Study (2019)

Light Rail

Light Rail Service Standards

Vehicle Load

Table 85 summarizes the vehicle load standard for Light Rail railcar vehicles. Light Rail allows 84 seated passengers and 90 standees per vehicle, representing a maximum load standard of 2.1 of seated load.

Table 85: Light Rail Vehicle Load Standard

Type of Vehicle	Seated Capacity (Passengers)	Standing Capacity (Passengers)	Full Car (Seated Plus Standing Passengers)	Maximum Load Standard
Light Rail Vehicle	84	90	174	2.1 of seated load

Source: MDOT MTA

Vehicle Headway

Table 86 summarizes Light Rail maximum headways by line and time period. The BWI and Cromwell Lines have a maximum headway of 10 minutes during weekday peak periods, 15 minutes during weekday off-peak periods, and 20 minutes during weekend periods.

Table 86: Light Rail Maximum Headways by Line and Time Period

	Maximum Headway	
Time Period	Hunt Valley to BWI Airport	Hunt Valley to Cromwell Station/Glen Burnie
Weekday AM and PM Peak	10 minutes	10 minutes
Weekday Off-Peak	15 minutes	15 minutes
Saturday	15 minutes	15 minutes
Sunday	15 minutes	15 minutes

Source: MDOT MTA

On-Time Performance

Light Rail on-time performance is measured by the number of vehicle trips divided by the number of revenue delays. The system uses a “three-minute rule,” whereby a train is considered on-time if it arrives within three minutes of a scheduled time. The Light Rail on-time performance target is ninety-five percent (95%) on-time.

Light Rail Service Policies

Transit Amenities

Light Rail aims to provide the following items at stops:

- Platform light poles

- Parking lot lighting
- Van parking
- ADA parking
- Electric vehicle parking
- Shelters with lighting
- Benches
- Trash receptacles
- Pedestrian lighting
- Ticket vending machines (TVMs)
- CCTV cameras.

Vehicle Assignment

Light Rail is served by a fleet of 40 Light Rail vehicles. Vehicles are placed into service through a process that requires rail car maintenance to assess a vehicle's readiness for revenue service. Each vehicle is then placed on a status sheet that is distributed to Light Rail Control. Several factors, such as peak or off-peak hours and special events, will determine the number of vehicles placed into service.

Light Rail Transit Service Monitoring

Analysis of Service Standards

Vehicle Load

The Light Rail load standard on all vehicles is 2.1, and vehicle capacity is not to exceed 174 passengers (in a non-crushed load situation). As Light Rail only collects summary boarding level, only an estimated analysis of average passenger load conditions is possible. Light Rail ridership data is also unavailable by service pattern.

Table 87 summarizes average daily ridership, scheduled trips, and ridership per trip by day type during April 2025. During peak service, Light Rail operates up to 32 weekday and 22 weekend Light Rail vehicles. While conditions may have in reality varied during peak versus off-peak periods, on weekdays, Saturdays, and Sundays, average ridership by trip did not surpass 174, the maximum allowable load per vehicle. Considering that Light Rail operates between one and three vehicles per trip, load conditions most likely did not regularly reach an overcrowded level.

Table 87: Light Rail Ridership Statistics, April 2025

Day Type	Average Daily Ridership	Daily Scheduled Trips	Average Ridership per Trip
Weekday	16,311	221	74
Saturday	10,428	168	62
Sunday	6,633	103	64

Source: MDOT MTA

Vehicle Headways

Table 88 summarizes Light Rail average published headways by line and time period. Peak period headways were on average five minutes below the service standard. Other periods, service meets or exceeds the standard.

Table 88: Light Rail Average Published Headways Spring 2025

Time Period	Average Published Headway	
	Hunt Valley to BWI Airport	Hunt Valley to Cromwell Station/Glen Burnie
Weekday AM and PM Peak	15 minutes	15 minutes
Weekday Off-Peak	15 minutes	15 minutes
Saturday	15 minutes	15 minutes
Sunday	15 minutes	15 minutes

Source: MDOT MTA GTFS – Spring 2025

On-Time Performance

Light Rail on-time performance is measured by the number of vehicle trips divided by the number of revenue delays. The system uses a “three-minute rule,” whereby a train is considered on-time if it arrives within three minutes of a

scheduled time. The Light Rail on-time performance target is ninety-five percent (95%) on-time. **Table 89** summarizes average daily on-time performance on Light Rail (which reports this metric on an average daily basis) during April 2025. During this period, weekend service had the most difficulty meeting the standard.

Table 89: Light Rail Average On-Time Performance: April 2025

Period	On-Time Performance
Weekday	94.7%
Saturday	89.4%
Sunday	100.0%

Source: MDOT MTA

Analysis of Service Policies

Transit Amenities

Table 90 summarizes transit amenities by Light Rail station, as well as whether each station is located in a minority Census Block Group. Of 32 total stations, 12 are located in Light Rail minority Block Groups; 20 are located in Light Rail non-minority Block Groups. All Light Rail stations have shelters and ticket vending machines. Each station is lacking one of the following amenities: platform light poles, trash cans, LED/PA poles, and benches. A majority of stations lack parking lot lighting, shelter lights, van parking, ADA parking and electric vehicle parking.

Of the amenities that a majority of stations are missing, non-minority Block Group stations outperform minority Block Group stations. The disparity in amenity distribution is greatest in shelter lighting: while no minority Block Group stations have shelter lights, fifty percent (50.00%) of non-minority Block Group stations do have shelter lights. During the 2023-26 triennial period, MDOT MTA's Title VI Coordinator will work with Light Rail operating and maintenance staff to review options for new or replacement shelters placed at Light Rail stations in minority communities to determine if shelters with lighting are feasible at that location.

Vehicle Assignment

The Light Rail vehicle maintenance team assesses vehicles' readiness for revenue service. Blocks are assigned to the available in-service Light Rail vehicles. Each vehicle is placed on a status sheet that is distributed to the MDOT MTA Light Rail Operations team. Several factors, including peak or off-peak hours, or timing of special events, determine vehicle assignment.

Table 90: Distribution of Transit Amenities at Light Rail Stations

Light Rail Station	Minority	Platform Light Poles	Parking Lot Lighting	Shelter Lights	Trash Cans	LED / PA Poles	Shelters	Regular Parking Spaces	Van Parking Spaces	ADA Parking Spaces	EV Parking Spaces[43]	TVM	Benches	CCTV Cameras [44]
Baltimore Arena	Yes	26	0	12	6	1	1	0	1	0	0	3	0	Yes
Baltimore Highlands	Yes	26	0	6	7	2	3	47	0	3	0	2	2	No
BWI Airport	Yes	18	11	0	6	2	3	0	0	0	0	2	2	Yes
BWI Business District	No	18	11	0	6	2	1	31	1	4	0	2	2	Yes
Camden Station / Camden Yards	No	82	0	0	12	2	2	0	0	0	0	2	2	Yes
Cherry Hill	Yes	22	10	0	8	2	3	0	0	0	0	2	2	Yes
Cold Spring Lane	No	16	0	2	7	7	3	0	0	0	0	2	2	Yes
Convention Center	No	NA	NA	NA	12	NA	2	0	5	0	0	3	NA	Yes
Cromwell / Glen Burnie	No	47	57	0	6	2	6	741	0	17	2	8	4	Yes
Cultural Center / State Center	Yes	9	0	0	4	7	1	0	0	0	0	2	5	Yes
Fairgrounds	No	18	21	0	3	2	3	384	0	10	2	3	2	Yes
Falls Road	No	16	26	6	6	8	1	191	0	6	2	2	4	No
Ferndale	No	16	0	12	7	2	1	0	0	0	0	2	6	No
Gilroy Road	No	15	0	0	7	1	1	0	0	0	0	2	4	No
Hunt Valley	No	14	5	2	10	5	1	136	0	5	0	3	3	Yes
Lexington Market	Yes	4	0	0	10	4	3	0	0	0	0	5	5	Yes
Linthicum	No	16	0	12	7	2	3	0	4	0	0	2	6	Yes
Lutherville	No	26	19	6	5	2	3	294	0	11	2	3	2	No
McCormick Road	No	9	0	0	4	1	1	0	0	0	0	2	1	No

[43] EV parking assessment conducted as part of 2023 MTA rail amenity inventory.

[44] Camera assessment conducted as part of 2023 MTA rail amenity inventory.

Light Rail Station	Minority	Platform Light Poles	Parking Lot Lighting	Shelter Lights	Trash Cans	LED / PA Poles	Shelters	Regular Parking Spaces	Van Parking Spaces	ADA Parking Spaces	EV Parking Spaces[43]	TVM	Benches	CCTV Cameras [44]
Mount Royal / MICA	Yes	17	12	0	6	2	2	0	0	0	0	2	4	Yes
Mount Vernon	Yes	26	12	0	8	1	2	0	2	0	0	2	3	Yes
Mount Washington	No	16	7	6	8	2	3	73	1	6	2	2	2	No
North Avenue	No	30	12	0	6	2	2	34	4	2	0	2	2	Yes
North Linthicum	No	24	18	12	6	2	2	321	1	12	2	3	2	Yes
Nursery Road	Yes	21	2	0	6	2	1	33	2	2	0	2	2	Yes
Patapsco	Yes	24	13	0	4	2	6	186	0	8	0	2	2	Yes
Pepper Road	No	9	0	0	8	1	1	0	0	0	0	2	1	No
Stadium / Federal Hill	Yes	42	0	0	6	2	2	0	0	0	0	2	4	Yes
Timonium	No	20	0	6	11	7	1	0	4	0	0	2	3	No
Warren Road	No	16	22	2	4	8	1	328	0	8	0	2	2	Yes
Westport	Yes	42	0	0	7	2	3	0	0	0	0	2	4	Yes
Woodberry	No	18	0	6	6	2	1	0	0	0	0	2	4	Yes

Source: MDOT MTA – Amenities Inventories (**2019, 2021,** 2023-2024)

Metro Subway

Metro Subway Service Standards

Vehicle Load

Table 91 summarizes the vehicle load standard for the Metro Subway railcar vehicle currently in service. Metro Subway allows 76 seated passengers and 90 standees per vehicle, representing a maximum load standard of 2.2 of seated load.

Table 91: Metro Subway Vehicle Load Standard

Type of Vehicle	Seated Capacity (Passengers)	Standing Capacity (Passengers)	Full Car (Seated Plus Standing Passengers)	Maximum Load Standard
75' Railcar	76	90	166	2.2 of seated load

Source: MDOT MTA

Vehicle Headways

Metro Subway operates on weekdays at a maximum frequency of eight minutes in the peak period, 10 minutes in the midday and evenings, and 15 minutes on the weekends (**Table 92**).

Table 92: Metro Subway Maximum Headways by Time Period

Time Period	Maximum Headway
Weekday Peak	8 minutes
Weekday Off-Peak	15 minutes
Weekend	15 minutes

On-Time Performance

Metro Subway considers a vehicle on time if it leaves the terminus within three minutes of its scheduled time. The Metro Subway on-time performance target is ninety-five percent (95%) on-time.

Metro Subway Service Policies

Transit Amenities

Metro Subway aims to provide the following items at all stops:

- Seating (such as benches, seats at stops and stations):
  - Covered benches are provided in all underground stations. Covered and uncovered benches are provided in all above ground stations.
- Shelters:
  - MDOT MTA has installed and maintained shelters at all above ground Metro Subway stations (six) along bus loops.
- Provision of Information:
  - Metro Subway provides printed signs, system maps, route maps, and schedules at stations.
- Escalators/Elevators:
  - All Metro Subway stations are equipped with elevators and escalators.

Vehicle Assignment

Metro Subway is a single rail line served by a fleet of 96 rail cars stored at the Wabash Rail Division. As the system consists of just one service line, Metro Subway assigns vehicles based on revenue readiness of available rail cars.

Metro Subway Transit Service Monitoring

Analysis of Service Standards

Vehicle Load

The Metro Subway load standard on all vehicles is 2.2, and vehicle capacity is not to exceed 166 passengers (in a non-crushed load situation). Like Light Rail, Metro Subway only collects summary boarding levels, only an estimated analysis of average passenger load conditions is possible.

Table 93 summarizes average daily ridership, scheduled trips, and ridership per trip by day type during April 2025. During peak service, Metro Subway is well below its load standard for all periods.

Table 93: Metro Subway Ridership Statistics, April 2025

Day Type	Average Daily Ridership	Scheduled Trips	Average Ridership per Trip	Average Load
Weekday	14,275	247	58	0.35
Saturday	9,984	152	66	0.40
Sunday	9,984	152	66	0.40

Source: MDOT MTA

Vehicle Headway

Table 94 summarizes Metro Subway average published headway by time period. Weekend service slightly exceeded the standard in April 2025.

Table 94: Metro Subway Average Published Headways

Time Period	Average Published Headway
Weekday Peak	8 minutes
Weekday Off-Peak	12 minutes
Saturday	16 minutes
Sunday	16 minutes

Source: MDOT MTA GTFS

On-Time Performance

Metro Subway considers a vehicle on time if it leaves the terminus within three minutes of its scheduled time. The Metro Subway on-time performance target is ninety-five percent (95%) on-time. **Table 95** summarizes average daily on-time performance Metro Subway (which reports this metric on an average daily basis) during April 2025.

Table 95: Metro Subway Average On-Time Performance, April 2025

Period	On-Time Performance
Weekday	93%
Saturday	78%
Sunday	80%

Source: MDOT MTA

Analysis of Service Policies

Transit Amenities

All Metro Subway stations currently fulfill agency policies for seating, shelters, provision of information, and escalators or elevators. Of 14 total stations, ten are located in Metro Subway minority Block Groups, and four are located in Metro Subway non-minority Block Groups (**Table 96**).

Comfort: All stations for Metro Subway have seating. Underground stations have benches, whereas above-ground stations have shelters with benches inside the shelters. All stations also play the MTA radio station WTTZ-93.5. No Metro Subway stations have bathrooms that are available to the general riding public.

Convenience: All stations for Metro Subway have escalators/elevators, ticket vending machines (TVMs), and trash receptacles. Three Metro Subway stations have recycling receptacles. Metro Subway provides printed signs, Title VI Notices, system maps, route maps, and schedules at stations.

Safety: All stations for Metro Subway have lighting and CCTV.

Table 96: Metro Station Minority Designation

Subway Station	Minority Block Group Designation
Charles Center Metro Station	Non-Minority
John Hopkins Metro Station	Non-Minority
Lexington Market Metro Station	Minority
Milford Mill Metro Station	Minority
Mondawmin Metro Station	Minority
Old Court Metro Station	Minority
Owing Mills Metro Station	Non-Minority
Penn-North Metro Station	Minority
Reisterstown Plaza Metro Station	Minority
Rogers Avenue Metro Station	Minority
Shot Tower Metro Station	Non-Minority
State Center Metro Station	Minority
Upton Metro Station	Minority
West Cold Spring Metro Station	Minority

Source: MDOT MTA

Vehicle Assignment

Metro Subway is a single rail line served by 96 total rail cars stored at the Wabash Rail Division. Given that the service only has one line, Metro Subway assigns cars to trips based solely on availability of revenue-ready vehicles.

MARC Commuter Rail

MARC Commuter Rail Service Standards

Vehicle Load

Table 97 summarizes, by vehicle type, the seated, standing, and total capacity on MARC vehicles; as well as the maximum load standard (1.3 for all vehicles). Total allowable capacity on MARC vehicles ranges from 139 to 170 passengers.

Table 97: MARC Commuter Rail Vehicle Load Standards

Vehicle Type	Seated Capacity (Passengers)	Standing Capacity (Passengers)	Total Capacity (Passengers)	Maximum Load Standard
MARC II-A Sumitomo Trailer Cars	122	31	153	1.3
MARC II-B Sumitomo Trailer Cars	116	31	147	1.3
MARC II Sumitomo Cab E/H Cars	111	28	139	1.3
MARC II Sumitomo E&H Cars	114	29	143	1.3
MARC III Kawasaki Trailer Cars	132	34	166	1.3
MARC III Kawasaki Cab Cars	130	33	163	1.3
MARC III Kawasaki Snack Cars	132	33	165	1.3
MARC III Kawasaki E/H Cars	130	33	163	1.3
MARC IV Bombardier Trailer Cars	136	34	170	1.3
MARC IV Bombardier Cab Cars	122	31	153	1.3
MARC IV Bombardier Toilet Cars	126	32	158	1.3

Source: MDOT MTA

Vehicle Headway

Table 98 summarizes MARC Commuter Rail headway standards by line and time period that was utilized in the past three years (2023-2026). On weekdays, service operates from approximately 4:30 a.m. to 11:00 p.m. Penn Line maximum weekday headways range from 25 to 60 minutes; Camden Line maximum headways range from 35 to 55 minutes; and Brunswick Line maximum headways range from 25 to 55 minutes. On Saturdays and Sundays, the Penn Line maximum headway is two hours, or 120 minutes.

Table 98: MARC Commuter Rail Maximum Headways by Line and Time Period (2023-2026 Standard)

Time Period	Maximum Headway		
	Penn Line	Camden Line	Brunswick Line
Weekday AM Peak	25 minutes	35 minutes	25 minutes
Weekday PM Peak	30 minutes	35 minutes	35 minutes
Weekday Off-Peak	60 minutes	35 minutes (AM)/ 55 minutes (PM)	35 minutes (AM)/ 55 minutes (PM)
Saturday	120 minutes	-	-
Sunday	120 minutes	-	-

Source: MDOT MTA

During the update of 2026 MTA Title VI Program, after detailed discussion with the MARC planning team, the new service standard that will be used for the next three years are shown in **Table 99**.

Table 99: MARC Commuter Rail Maximum Headways by Line and Time Period (2026 beyond)

Time Period	Maximum Headway		
	Penn Line (Baltimore-DC Trunk Only)	Camden Line	Brunswick Line (Baltimore-DC Trunk Only)
Weekday AM/PM Peak	30 minutes in Peak Direction	60 minutes in Peak Direction	9 trips in Peak Direction
Weekday Off-Peak	60 minutes	-	-
Saturday	120 minutes	-	-
Sunday	120 minutes	-	-

On-Time Performance

MARC Commuter Rail trains are considered on-time if reaching a terminus within six minutes of a published schedule time. The MARC on-time performance target is ninety-five percent (95%) on-time.

MARC Commuter Rail Service Policies

Transit Amenities

MARC Commuter Rail aims to provide the following items at all agency-owned stations:

- Parking spaces.
- Pedestrian track crossings when required to access opposite track.
- Seating such as benches and seats at stops, installed in accordance with ridership levels.
- Bus and rail shelters as well as rail platform canopies, installed in accordance with ridership levels.
- Provision of information, to include:
    - Printed signs, system maps, route maps, and schedules, including posted train schedules for their respective routes.
    - Digital equipment such as next vehicle arrival time signs along bus routes and at fixed guideway stations. Full-service MARC stations owned by MDOT MTA have passenger information displays that show next train arrival information. Passenger information displays (PIDs) at stations that MDOT MTA does not own or maintain are the responsibility of the agency or third party that owns the station.
- Elevators, installed where necessary at ADA-accessible stations.
- Waste receptacles.
- Ticket vending machines (TVMs), installed based on ridership, where physically possible.
- Bathrooms, installed based on ridership and ADA regulations.
- Lighting at all MDOT MTA-owned stations.
- CCTV, installed and managed by MDOT MTA Police.

Vehicle Assignment

MARC Commuter Rail operates three types of rail cars: single-level MARC II, bi-level MARC III, and multi-level MARC IV. All three rail vehicles are eligible to run throughout the entire MARC service area. Despite the versatility of the fleet, though, there are several storage and maintenance, operational, service, and logistical factors that influence how the fleet is distributed. In what follows, each MARC rail car is described alongside an explanation of its primary MARC line assignment.

Rail Car 1: MARC II

MARC II cars are primarily assigned to the Camden Line for operational, storage, logistical, and maintenance reasons. Some MARC IIs have been retrofitted to include bicycle racks, thus reducing seating capacity by six seats.

- Operational: The MARC II rail cars are qualified to operate at a maximum speed of 110 miles per hour by the Federal Railroad Administration (FRA). This speed is adequate for service on the Camden and Brunswick Lines, which have a maximum operating speed of 79 miles per hour. The 110 miles per hour qualified maximum speed is limiting on the Penn Line, which has a maximum operating speed of 125 miles per hour.
- Logistical/Maintenance: The Riverside Maintenance Facility is equipped with the necessary support systems for proper maintenance and repair of MARC II rail cars. Because the facility is directly accessible from the Camden Line right of way and accommodates the storage and maintenance of all Camden Line equipment, MARC II rail cars are primarily assigned to the Camden Line.

Rail Car 2: MARC III

MARC III cars are primarily assigned to the Penn Line for operational, service, logistical, and maintenance reasons:

- Operational: MARC III rail cars are qualified to operate at a speed of 125 miles per hour by the FRA. The Penn Line is the only alignment in the MARC service area with tracks allowing a speed of 125 miles per hour; thus, MARC III rail cars are primarily assigned to the Penn Line.
- Service: The MARC Penn Line is the highest ridership MARC line. To accommodate high ridership and maximize seat availability, MARC III vehicles (which are bi-level) are assigned to the Penn Line. MARC has also introduced full-size bike accommodations for peak Penn Line trains in response to customer demand. To guarantee this service for identified trains, the equipment needs to be available for Penn Line weekday service.
- Logistical/Maintenance: MARC III railcars are maintained by Amtrak at the Ivy City Maintenance facility in Washington DC, as MDOT MTA does not have its own facility with the necessary additional space and maintenance capacity.

Rail Car 3: MARC IV

MARC IV rail cars are primarily assigned to the Brunswick Line for operational, service, logistical, and maintenance reasons.

- Operational: MARC IV rail cars are qualified to operate at a speed of 125 miles per hour by the FRA. Trains equipped with MARC IV rail cars, while operational on the Brunswick Line, are interlined with MARC Penn Line midday train service. This allows for midday Penn Line service at a faster speed.
- Service: Due to high ridership and limitations on storage capacity at layover facilities, bi-level vehicles are primarily required to provide the optimal amount of seating possible.
- Logistical/Maintenance: Trains equipped with MARC IV railcars are interlined with MARC Penn Line midday service. This allows the rail cars access to their primary main maintenance and repair facility. Additionally, these cars replaced older bi-level gallery cars that were exclusively assigned to the Brunswick Line due to height restrictions on other MARC service lines.

MARC Commuter Rail Transit Service Monitoring

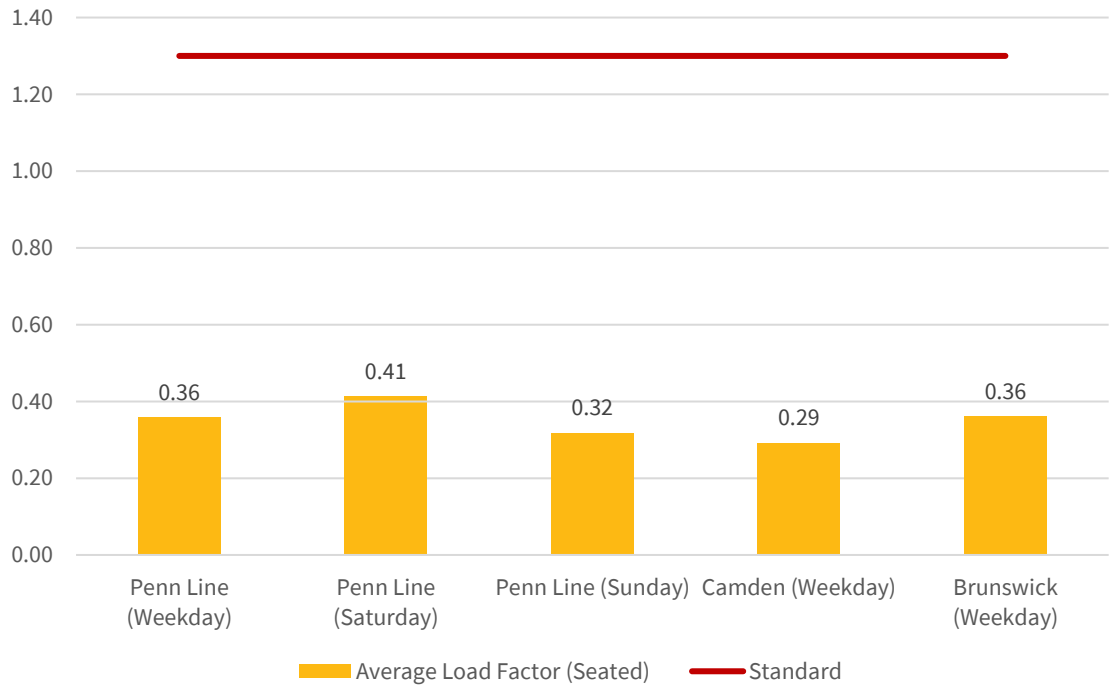
Analysis of Service Standards

Vehicle Load

The MARC Commuter Rail vehicle load standard is 1.3 on all vehicles across all day types. All MARC lines are classified as minority routes. **Figure 27** summarizes average load factor by line and day type from April 2025. Average load factors were calculated by using the route's average daily ridership to estimate average daily ridership by trip for each day type. Based on seating capacities across vehicle types and lines, persons per car was estimated, as was six cars per average train for Penn Line, five cars per average train for Brunswick Line, and four cars per average train for Camden Line. Seated capacity per line was calculated using the midpoint range of vehicle types/assignments. Penn Line (MARC IIIs) used 131 seats per car, Camden Line (MARC IIs) used 115 seats per car, and Brunswick Line (MARC IVs) used 126 seats per car.

Based on these assumptions, estimated ridership per car, per trip, was calculated. This figure was divided by the midpoint seating capacity per car to estimate average load factor per MARC vehicle. As shown below, across all day types, no line exceeds the load standard of 1.3. Average load factor was, on average, highest on the Penn Line on Saturdays (0.41). For all trips within April 2025, over ninety-nine percent (99.25%) of trips were falling within the vehicle load standard.

Figure 27: MARC Commuter Rail Average Load Factor by Line, April 2025



Source: MDOT MTA

Vehicle Headways

Table 100 summarizes MARC Commuter Rail actual average published headways by line and time period. MARC headway standards are set by line and for AM Peak, PM Peak, Off-Peak, and weekend periods. Across all time periods, all MARC line average published headways meet the standards set by the service.

Table 100: Average Published Headways, April 2025

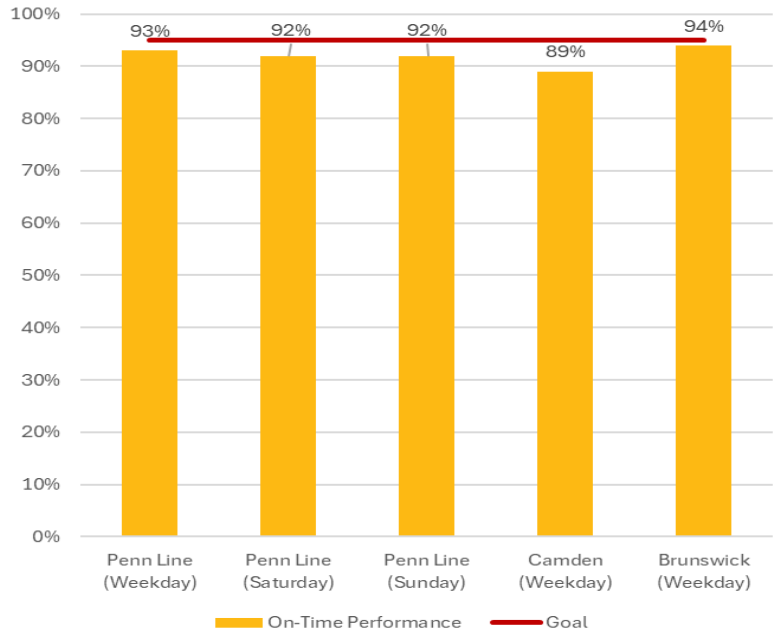
Time Period	Average Published Headway April 2025		
	Penn Line	Camden Line	Brunswick Line
Weekday AM Peak	24 minutes	34 minutes	25 minutes
Weekday PM Peak	28 minutes	42 minutes	26 minutes
Weekday Off-Peak	37 minutes	50 minutes	22 minutes
Saturday	90 minutes	-	-
Sunday	109 minutes	-	-

Source: MDOT MTA – GTFS

On Time Performance

MARC Commuter Rail trains are considered on-time if the train reaches a terminus within six minutes of a published schedule time. The MARC on-time performance target is ninety-five percent (95%) on-time. **Figure 28** shows average on-time performance on MARC lines (by day type) during April 2025. MARC reports on-time performance at the aggregate day rather than time period level. During this period, no service reached the ninety-five percent (95%) systemwide goal. Penn Line weekday service was at ninety-three percent (93%), Camden Line weekday service was at eighty-nine percent (89%), and Brunswick Line weekday service was the highest at ninety-four percent (94%). Penn Line Saturday and Sunday service were both at ninety-two percent (92%).

Figure 28: MARC Average Monthly On-Time Performance, April 2025



Source: MDOT MTA - MARC

Analysis of Service Policies

Transit Amenities

Table 101, **Table 102**, and **Table 103** summarize transit amenities provision by MARC line and station based on MARC's transit amenities policy, which calls for 15 total amenities at each station. Of MDOT MTA-owned MARC stations, station locations are split as follows:

- On the Penn Line, six stations are located in MARC minority Block Groups; seven stations are located in MARC non-minority Block Groups.
- On the Camden Line, eight stations are located in MARC minority Block Groups; four stations are located in MARC non-minority Block Groups.
- On the Brunswick Line, five stations are located in MARC minority Block Groups; 14 stations are located in MARC non-minority Block Groups.

The following items are of note:

- All MARC stations have parking.
- The three stations without crossings (Camden, Monocacy and Frederick) do not require passengers to cross tracks to travel in the opposite direction.
- Service at the Laurel Racetrack station is very limited. Only evening south/westbound trains (to Washington) stop at this station, and it is what is known as a "flag stop" - it is not a routine stop. Trains only stop if passengers need to get on or off. Therefore, the station has few amenities.
- Some stations without platform canopies do have buildings with overhangs that provide shelter for some of the platform as well as internal seating areas.

Table 101: Transit Amenities at MDOT MTA-Owned MARC Commuter Rail Penn Line Stations

Station	In Minority Block Group	Parking Spaces	Pedestrian Track Crossings	Seating	Bus and Rail Shelters	Rail Platform Canopies	Printed Signs	System Maps	Route Maps	Schedules	Next Vehicle Arrival	PIDs	Elevators	Waste Bins	Rest Rooms	TVM
Edgewood	Yes	262	Underpass	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Martin Airport	No	337	At Grade	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Halethorpe	No	834	Overpass	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
BWI Airport	No	3,135	Overpass	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Bowie State University	Yes	646	Underpass	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes

Source: MDOT MTA

Table 102: Transit Amenities at MDOT MTA-Owned MARC Commuter Rail Camden Line Stations

Station	In Minority Block Group	Parking Spaces	Pedestrian Track Crossings	Seating	Bus and Rail Shelters	Rail Platform Canopies	Printed Signs	System Maps	Route Maps	Schedules	Next Vehicle Arrival	PIDs	Elevators	Waste Bins	Rest Rooms
Camden	No	1,004	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Dorsey	Yes	873	At Grade	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Savage	No	966	At Grade	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Garage	Yes	No	Yes

Station	In Minority Block Group	Parking Spaces	Pedestrian Track Crossings	Seating	Bus and Rail Shelters	Rail Platform Canopies	Printed Signs	System Maps	Route Maps	Schedules	Next Vehicle Arrival	PIDs	Elevators	Waste Bins	Rest Rooms
Laurel	Yes	460	At Grade	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes
Muirkirk	Yes	661	At Grade	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No

Source: MDOT MTA

Table 103: Transit Amenities at MDOT MTA-Owned MARC Commuter Rail Brunswick Line Stations

Station	In Minority Block Group	Parking Spaces	Pedestrian Track Crossings	Seating	Bus and Rail Shelters	Rail Platform Canopies	Printed Signs	System Maps	Route Maps	Schedules	Next Vehicle Arrival	PIDs	Elevators	Waste Bins	Rest Rooms	TVMs
Frederick	No	90	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No
Monocacy	No	768	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes
Martinsburg	No	112	Overpass	Yes	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
Barnesville	No	66	At Grade	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No

Source: MDOT MTA

Vehicle Assignment

Table 104 summarizes the vehicle age range by each MARC Commuter Rail vehicle type. The age of the train car is considered to be the number of years since its mid-life overhaul or, if no overhaul has been performed, the number of years since it was manufactured.

Table 104: MARC Commuter Rail Vehicle Age by Type

Vehicle	Type	Year of Manufacture	Year of Last Overhaul	Vehicle Age (Years)	Number of Vehicles	Line Assignment(s)
MARC IIA	Single Level	1987	1994	30	50	Brunswick, Camden, Penn
MARC IIB	Single Level	1993	2010	14	9	Brunswick, Camden, Penn
MARC III	Bi-Level	1999	N/A	25	53	Penn
MARC IV	Multi-Level	2013	N/A	11	54	Brunswick, Camden, Penn

Source: MDOT MTA

All MARC lines are considered minority lines; thus, comparison of minority line-assigned versus non-minority line-assigned vehicles is not possible. MARC assigns cars to trips based solely on availability of revenue-ready train cars.

All Modes

All Modes Service Availability Standards

Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service. **Table 105** lists each MDOT MTA mode's service area, as discussed in the Service Area Profile. Each service area includes the population residing in entire Census Block Groups within given distances of transit services.

Table 105: MDOT MTA Service Area Definitions

Mode	Service Area Definition
Core Bus	All Census Block Groups within 0.5 miles of Core Bus stops.
Commuter Bus	All Census Block Groups within three miles of Commuter Bus stops, excluding stops where morning boarding is not possible.
MARC Commuter Rail	All Census Block Groups within three miles of MARC stations.
Light Rail	All Census Block Groups within 0.75 miles of Light Rail stations.
Metro Subway	All Census Block Groups within 0.75 miles of Metro Subway stations.

Source: MDOT MTA

All Modes Service Availability Analysis

MDOT MTA service availability pertains to the minority and non-minority population able to be realistically served by each mode. Based on American Community Survey 2019-2023 Five-Year estimates, **Table 106** estimates the total and percentage minority and non-minority population served within each MDOT MTA mode service area. All service areas are available to a population with a higher minority than non-minority percentage. Core Bus service is available to a population that is approximately fifty-nine percent (59%) minority, while Commuter Bus service is available to a population that is just over fifty-eight percent (58%) minority. The MARC Commuter Rail service area population is roughly sixty-three percent (63%) minority, while the Light Rail service area population is over fifty-two percent (52%) minority. At roughly seventy-six (76%) percent, Metro Subway's service area population has the largest minority population share of any modal service area.

Table 106: Minority Population Served by MDOT MTA Mode Service Area

Service Type	Minority Population Served		Non-Minority Population Served	
	Total	***Percent***	***Total***	***Percent***
Core Bus	907,344	59%	634,158	41%
Commuter Bus	1,770,254	58%	1,278,168	42%
MARC	1,790,905	63%	1,045,935	37%
Light Rail	121,310	53%	109,746	48%
Metro Subway	174,996	77%	53,442	23%

Source: American Community Survey Five-Year Estimates, 2019-2023, Table B03002: Hispanic or Latino Origin by Race

Evaluation of Service and Fare Changes

MDOT MTA conducts a Service Equity Analysis whenever a Major Service Change is proposed, and a Fare Equity Analysis when a fare change of any magnitude is proposed (including a fare increase or decrease; change to fare media; or change to fare type). This section discusses the development of MDOT MTA's Major Service Change, Disparate Impact, and Disproportionate Burden policies, which together guide completion of Service or Fare Equity Analyses.

During the development of MDOT MTA's 2020-23 Title VI Program, through a robust internal and external engagement process, MDOT MTA updated its Major Service Change policies for each of the five transit modes and updated its Disparate Impact and Disproportionate Burden policies. In Summer and Fall 2021, MDOT MTA returned to its stakeholders to revise its Major Service Change policy to ensure the equitable provision of service in a post-pandemic environment.

This section of the Title VI Program describes the update adopted by MDOT MTA in October 2021 and concludes with a summary of the procedures for conducting Service Equity and Fare Equity analyses. There have been no significant updates to this section since that time.

Major Service Change Policy

In Fall 2021, MDOT MTA elected to revise its Core Bus Major Service Change policy to account for systemwide changes, cumulative changes over one year, and changes to bus stops that could trigger a Major Service Change. MDOT MTA presented the proposed policy changes to its citizen advisory committees for their feedback and conducted three virtual public meetings at different times of the day to ensure accessibility for the public. The new Major Service Change policy was approved in October 2021. FTA guidance specifies that "[t]he threshold for [Major Service Change] analysis shall not be set so high so as to never require an analysis; rather, agencies shall select a threshold most likely to yield a meaningful result in light of the transit provider's system characteristics." The revised Major Service Change policies were developed with input from staff across all modes at MDOT MTA along with public feedback via virtual stakeholder meetings.

The following pages detail the definitions applied to the Major Service Change policy, exemptions to the policy, the policy for each MDOT MTA mode of service and the public engagement conducted for the change.

Major Service Change Policy Definitions

The following terms found in the major service change policy are defined in **Table 107**. **Table 108** details the major service change policies by mode.

Table 107: Major Service Change Policy Definitions

Item	Definition
Service Day	A Weekday, Saturday, or Sunday service schedule.
Span of Service	For a given service day schedule, the time from the start of the first revenue trip through the end of the final revenue trip.
Revenue Hours	Hours that a transit vehicle spends in revenue service, including time spent picking up and dropping off passengers, and operator layover time. Revenue hours do not include time spent driving empty vehicles to and from garages ("deadhead"), operator training, or maintenance testing.
Revenue Miles	Miles that a transit vehicle spends in revenue service, including miles driven picking up and dropping off passengers, and operator layover time. Revenue miles do not include miles empty vehicles drive to and from garages ("deadhead"), operator training, or maintenance testing.
Stop at a Station	A single departure or arrival at a rail station.
Core Bus System	MDOT MTA bus service, including CityLink bus, Local Bus, and Express Bus service.
Service Year	One calendar year, equal to 365 or 366 days.

Table 108: Major Service Change Policies By Mode

Core Bus	Alteration of a route's revenue miles or revenue hours on a given service day by twenty-five percent (25.00%) or more, including establishment or abandonment of a route. Alteration of a route's revenue miles or revenue hours on a given service day by a cumulative twenty-five percent (25.00%) or more over one service year. Change to the span of service on a route by ninety (90) minutes or more on a given service day.
	Addition or removal of at least fifteen percent (15.00%) of a route's bus stops on a given service day.
	Cumulative alteration[45] of at least fifteen percent (15.00%) of total Core Bus system revenue miles or revenue hours in a given service change on a given service day.
Commuter Bus	Alteration of a route's revenue miles or revenue hours on a given service day by twenty-five percent (25.00%) or more, including establishment or abandonment of a route. Change to the span of service on a route by ninety (90) minutes or more on a given service day. Elimination of service to a stop, unless there is another stop within three miles of its location.
	Establishment of a new stop.
	Cumulative alteration of at least fifteen percent (15.00%) of total Commuter Bus system revenue miles or revenue hours in a given service change across a typical week.
MARC	Alteration of a line's revenue miles or revenue hours on a given service day by twenty-five percent (25.00%) or more, including establishment or abandonment of a line. Change to the span of service on a line by ninety (90) minutes or more on a given service day. Change to the number of stops at a station on a given service day by twenty-five percent (25.00%) or more.
	Establishment or abandonment of a station.
	Cumulative alteration of at least fifteen percent (15.00%) of total MARC system revenue miles or revenue hours in a given service change across a typical week.
Light Rail	Alteration of a line's revenue miles or revenue hours on a given service day by twenty-five percent (25.00%) or more, including establishment or abandonment of a line. Change to the span of service on a line by ninety (90) minutes or more on a given service day.
	Change to the number of stops at a station on a given service day by twenty-five percent (25.00%) or more.
	Establishment or abandonment of a station.
Metro Subway	Alteration of a line's revenue miles or revenue hours on a given service day by twenty-five percent (25.00%) or more, including establishment or abandonment of a line. Change to the span of service on a line by ninety (90) minutes or more on a given service day.

[45] "Alteration" means a proposed service change that increases or reduces service in span of service, revenue miles, revenue hours or adds or removes stops. A change that shifts the same amount of service without increasing or reducing total service-for example, changing the service span from 6:00 a.m. -6:00 p.m. to 7:00 a.m.-7:00 p.m.-is not considered an alteration.

	Change to the number of stops at a station on a given service day by twenty-five percent (25.00%) or more.
	Establishment or abandonment of a station.

Exemptions

The following service changes are exempt from the Major Service Change Policy:

- Seasonal service changes.
- Creation, modification, or discontinuation of a demonstration route within the first 12 months of operation (however, Code of Maryland requirements will still apply).
- Diversions, frequency changes, or span modifications due to local events, construction, weather, and emergencies.
- Outages due to planned and/or unplanned maintenance, inspections, or repairs.
- Emergency service changes, including changes in routes or service frequencies, which may be necessitated due to a disaster, which severely impairs public health or safety, changes in access to public streets, or the ability of MDOT MTA equipment to travel on public streets. Emergency service changes may be implemented immediately without a public hearing provided that a finding identifying the circumstances under which the change is being taken is made by the Administrator and a subsequent public hearing is held and equity analysis is conducted, if the temporary change is to remain in effect longer than 12 months.

Public Outreach

The following public outreach efforts occurred for this update to MTA's Major Service Change Policy, prior to Administrator review, consideration, and approval of a finalized new policy:

- July 8, 2021 - MARC Riders' Advisory Council Meeting
- July 13, 2021 – Title VI Subcommittee Meeting
    - Joint Subcommittee of MTA's Citizen's Advisory Committee and MTA's Citizen's Advisory Committee for Accessible Transportation
- July 14, 2021 – Citizens Advisory Committee Meeting
- July 15, 2021 – Citizens Advisory Committee for Accessible Transportation Meeting September 20, 2021 – Virtual Public Meeting
- September 21, 2021 – Virtual Public Meeting
- September 22, 2021 – Virtual Public Meeting

Adverse Effects

FTA C 4702.1B specifies that transit providers shall define and analyze adverse effects related to major changes in transit service. If any of the criteria in

Table 108 are met when planning potential service changes, MDOT MTA shall consider potential adverse effects, measured by changes between existing and proposed service levels that can be deemed significant. Adverse effects may result from reductions or additions in service in any capacity, given that the latter may come at the expense of other service reductions.

Disparate Impact Policy

Definition of Disparate Impact

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin.

Disparate Impact Policy

A Disparate Impact occurs when the difference between minority riders and non-minority riders affected by a proposed fare or service change is ten percent (10.00%) or greater. When assessing the possibility of a proposed service change creating a Disparate Impact, changes to routes or fares are assessed cumulatively.

Disproportionate Burden Policy

Definition of Disproportionate Burden

Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

Disproportionate Burden Policy

A Disproportionate Burden occurs when the difference between low-income riders and non-low-income riders affected by a proposed fare or service change is ten percent (10.00%) or greater. When assessing the possibility of a proposed service change creating a Disproportionate Burden, changes to routes or fares are assessed cumulatively.

Service Equity Analysis Procedures

When conducting a Service Equity Analysis, MDOT MTA has the option of using the most recent American Community Survey Five-Year estimates, the Decennial Census, or origin-destination survey data, depending on availability and applicability to the Major Service Change under consideration. To assess for Disparate Impacts or Disproportionate Burdens, the effects of Major Service Changes are compared to minority and low-income percentages associated with each mode's service area. Changes to routes are assessed cumulatively. Data used for comparison (by mode and Major Service Change type) is summarized in **Table 109**.

Table 109: Data Used for Assessment of Disparate Impact/Disproportionate Burden, by Mode

Mode	Major Service Change Type	Census Data Geography Used for Comparison	Origin-Destination Survey Data Used for Comparison
Core Bus	Route-level revenue miles, revenue hours, or span modification (including a new route)	All Census Block Groups within 0.5 miles of the existing or proposed route alignment or route stops	Route-level demographic data
Commuter Bus	Route-level revenue miles, revenue hours, or span modification (including a new route)	All Census Block Groups within three miles of existing or proposed route stops	Route-level demographic data
	Elimination of service to a stop	All Census Block Groups within three miles of the existing stop	Stop-level demographic data, if available
	Establishment of a stop	All Census Block Groups within three miles of the proposed stop	Stop-level demographic data, if available
MARC	Line-level revenue miles, revenue hours, or span modification (including a new line)	All Census Block Groups within three miles of the existing or proposed line's stations	Line-level demographic data
	Change to number of stops at a station	All Census Block Groups within three miles of the existing or proposed station	Station-level demographic data, if available
	Establishment or abandonment of a station	All Census Block Groups within three miles of the existing or proposed station	Station-level demographic data, if available

Mode	Major Service Change Type	Census Data Geography Used for Comparison	Origin-Destination Survey Data Used for Comparison
Light Rail	Line-level revenue miles, revenue hours, or span modification (including a new line)	All Census Block Groups within 0.75 miles of the existing or proposed line's stations	Line-level demographic data
	Change to number of stops at a station	All Census Block Groups within 0.75 miles of the existing or proposed station	Station-level demographic data, if available
	Establishment or abandonment of a station	All Census Block Groups within 0.75 miles of the Station-level demographic data, if available station	Station-level demographic data, if available
Metro Subway	Line-level revenue miles, revenue hours, or span modification (including a new line)	All Census Block Groups within 0.75 miles of the existing or proposed line's stations	Line-level demographic data
	Change to number of stops at a station	All Census Block Groups within 0.75 miles of the existing or proposed station	Station-level demographic data, if available
	Establishment or abandonment of a station	All Census Block Groups within 0.75 miles of the existing or proposed station	Station-level demographic data, if available

Evaluation of Disparate Impact

To evaluate a potential Disparate Impact, if using Census data, MDOT MTA uses Table B03002, "Hispanic or Latino Origin by Race" (utilizing the most recent Five-Year American Community Survey or Decennial Census data available). This table identifies all minority and non-minority populations within a block group, including Hispanic or Latino. To calculate minority population for the service area of a mode, MDOT MTA subtracts non-Hispanic White population from total population. The remaining figure is divided by total population to determine a service area's minority population percentage. To calculate the minority population in the vicinity of a proposed Major Service Change, MDOT MTA uses the relevant geography specified in Table 105.

If using ridership data from an origin-destination survey to assess for a Disparate Impact, MDOT MTA may compare demographic information at the relevant service area level to demographic information around the site of a proposed Major Service Change. Given that this data is more difficult to maintain as current, Census data is more often utilized.

Determination of Disparate Impact: Service Reduction

For service reductions, a Disparate Impact occurs if the percentage minority population affected by a service reduction at a route, line, or stop level is at least 10 percentage points higher than the percentage minority population in the larger MDOT MTA mode service area.

Determination of Disparate Impact: Service Increase

For service increases, additions, or expansions, a Disparate Impact occurs if the percentage of minority population affected by a service improvement at a route, line, or stop level is at least 10 percentage points lower than the percentage minority population in the larger MDOT MTA mode service area.

Evaluation of Disproportionate Burden

To evaluate a potential Disproportionate Burden, if using Census data, MDOT MTA begins by calculating the average household size across the relevant service area's Block Groups (at the aggregate level), rounding this number to the nearest whole number, and corresponding this household size with the federal HUD Area Median Income limits for the "very low (fifty percent (50%))" for the Baltimore-Columbia-Towson, MD MSA. This figure is then referenced to the federal poverty limits for the service area's average household size at the corresponding federal poverty guideline multiple, rounded to the nearest income division (break point) identified in U.S. Census Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months" (utilizing the most recent Five-Year American Community Survey data available) to determine the income limit to qualify as low-income. This table identifies poverty intervals within a Block Group. The low-income percentage for a mode's service area is calculated by dividing the population of the service area living in poverty at the defined interval (200% for Core, Commuter Bus, MARC, Light Rail and Metro) divided by the population of the service area.

To calculate the percentage of low-income households in the vicinity of a proposed Major Service Change, MDOT MTA uses the same low-income threshold for the relevant geography specified in Table 105. As with Disparate Impacts, if using ridership data from an origin-destination survey to assess for a Disproportionate Burden, MDOT MTA may compare demographic information at the relevant service area level to demographic information around the site of a proposed Major Service Change.

Determination of Disproportionate Burden: Service Reduction

For service reductions, a Disproportionate Burden occurs if the percentage low-income population affected by a service reduction at a route, line, or stop level is at least 10 percentage points higher than the percentage low-income population in the larger MDOT MTA mode service area.

Determination of Disproportionate Burden: Service Increase

For service increases, additions, or expansions, a Disproportionate Burden occurs if the percentage low-income population affected by a service improvement at a route, line, or stop level is at least 10 percentage points lower than the percentage low-income population in the larger MDOT MTA mode service area.

Finding a Disparate Impact or Disproportionate Burden

Disparate Impact

If the disparate impact analysis finds a potential disparate impact on the basis of race, color, or national origin, MDOT MTA will first determine if it can modify the proposal to avoid, minimize or mitigate the adverse effects of the proposal and then reanalyze the changed proposal/s to determine if the modifications have eliminated the disparate impact.

At this stage, MDOT MTA shall examine other options to determine if there are alternative solutions that serve the same objectives but with less of a disparate effect on the basis of race, color, or national origin. During this phase, it shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

If after evaluating alternatives MDOT MTA is unable to eliminate a disparate impact it may only proceed with the proposal if it can clearly demonstrate that there is a substantial legitimate justification for the proposed service change, and there are no alternative solutions that it explored that would have a less disparate impact on minority riders but would still accomplish the operators legitimate program goals.

Disproportionate Burden

If the disproportionate burden analysis shows that the proposal places a disproportionate burden on low-income riders, MDOT MTA will take steps to avoid, minimize or mitigate impacts where practicable. MDOT MTA will communicate alternatives to low-income riders affected by the service change.

Fare Equity Analysis Procedures

MDOT MTA analyzes all fare increases, decreases, or changes to fare media (including payment type or fare structure) using a three-step Fare Equity Analysis process described below. Changes to fares are assessed cumulatively.

Step One: Identify Affected Fare Media or Payment Type(s)

MDOT MTA identifies the fare media affected by a proposed increase or decrease, or addition or removal (of a fare type). Fare media types may include one-way tickets, passes, or discount fares.

Step Two: Determine if Fare Media or Payment Type Used Disproportionately by Minority or Low-Income Riders

MDOT MTA uses the most recent available origin-destination or other survey data to determine if the relevant fare media or fare payment type(s) are used disproportionately by minority or low-income riders. When the absolute difference between the share of minority or low-income riders using a particular fare medium or fare payment type exceeds the share of all riders using that fare media by at least 10 percentage points, that fare media is judged to be used “disproportionately” by minority or low-income individuals. If a fare media is used disproportionately by one of these groups, MDOT MTA proceeds to Step Three for a more in-depth analysis; if not, the analysis concludes with no finding.

Step Three: Assess Fare Change for Disparate Impact and Disproportionate Burden

For a qualifying fare change, for each relevant transit mode, MDOT MTA calculates the existing cost, proposed cost, the absolute fare change, and percentage fare change. The agency then calculates the unweighted average percentage price change across all fare types in the market, by mode. For fare types used disproportionately by minority or low-income riders, MDOT MTA calculates the absolute difference between the percentage price change of the fare type and the average percentage price change for all fare types for the mode. If the percentage price increase or decrease for a qualifying fare type is 10 percentage points different than the unweighted average percentage price increase or decrease for all ticket types for the mode, the fare change has a Disparate Impact or Disproportionate Burden (depending on whether usage is disproportionately tied to minority or low-income riders).

Finding a Disparate Impact or Disproportionate Burden

Disparate Impact

If the disparate impact analysis finds a potential disparate impact on the basis of race, color, or national origin, MDOT MTA will first determine if it can modify the proposal to avoid, minimize or mitigate the adverse effects of the proposal and then reanalyze the changed proposal/s to determine if the modifications have eliminated the disparate impact.

At this stage, MDOT MTA shall examine other options to determine if there are alternative solutions that serve the same objectives but with less of a disparate effect on the basis of race, color, or national origin. During this phase, it shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

If after evaluating alternatives MDOT MTA is unable to eliminate a disparate impact it may only proceed with the proposal if it can clearly demonstrate that there is a substantial legitimate justification for the proposed service

change, and there are no alternative solutions that it explored that would have a less disparate impact on minority riders but would still accomplish the operators legitimate program goals.

Disproportionate Burden

If the disproportionate burden analysis shows that the proposal places a disproportionate burden on low-income riders, MDOT MTA will take steps to avoid, minimize or mitigate impacts where practicable. MDOT MTA will communicate alternatives to low-income riders affected by the service change.

Facility Equity Analysis Procedures

The Federal Transit Administration (FTA) requires that entities receiving federal funds conduct an analysis of impacts on minority and low-income communities stemming from improvements or changes made to fixed facilities such as bus depots, maintenance garages or operations centers. According to FTA Circular 4702.1B, the Title VI Analysis aims to ensure that the level and quality of public transportation service is provided in a non-discriminatory manner; promotes full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensures meaningful access to transit-related programs and activities by persons with limited English proficiency.

FTA's Title VI Requirements and Guidelines for Federal Transit Administration Recipients requires "Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure that location is selected, and modifications are made without regard to race, color or national origin."

MDOT MTA conducts a facility equity analysis when improving or making changes to its fixed facilities, or constructing a new fixed facility, during the project planning stages. Using recent Census demographic data for the area surrounding the facility, or the proposed facility site, MDOT MTA evaluates whether the facility changes or construction will have an adverse impact on minority or low-income communities in the surrounding area. When evaluating locations of facilities, MDOT MTA will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Based on the size and scope of the project and its potential to disrupt surrounding communities, MDOT MTA also ascertains if a public engagement effort is warranted. If so, MDOT MTA develops a public participation strategy for the project per the agency's Public Participation Plan. Feedback obtained from the public engagement efforts are reviewed and incorporated into the project where practicable. When constructing a new fixed facility, MDOT MTA will engage in outreach to persons potentially impacted by the facility siting.

If MDOT MTA determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, it may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to make this showing, MDOT MTA will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Appendix A: MDOT MTA Title VI Complaint Forms (English / Spanish)

Section I				
Name:				
Address:				
Telephone (Home)		Telephone (Work):		
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	

Section II		
Are you filing this complaint on your own behalf?	☐ Yes*	☐ No
*If you answered "Yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have the permission of the aggrieved party if you are filing on behalf of a third party.	☐ Yes	☐ No

Section III		
I believe the discrimination I experienced was based on (check all that apply):		
☐ Race	☐ Color	☐ National Origin
Date of 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 of any witnesses. If more space is needed, please use the back of this form.		

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

Section V		
Have you filed this Title VI complaint with any other Federal State, local agency, or with any Federal or State Court?	☐ Yes	☐ No

If yes, check all that apply:	
☐ Federal Agency:	
☐ Federal Court:	☐ State Agency:
☐ State Court:	☐ Local Agency:

Please provide information about a contact person at the agency or court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:

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

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

Signature and date required below.

_____ _____

Signature Date

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

Maryland Transit Administration
Office of Equal Opportunity Compliance Programs
6 Saint Paul Street
Baltimore, MD 21202

Signed complaint forms may be faxed to MTA's Office of Equal Opportunity Compliance Programs at: 410-333-1015.



Sección I				
Nombre:				
Dirección:				
Teléfono (Hogar)		Teléfono (Trabajo)		
Dirección de correo electrónico:				
¿Requisitos de formato accesibles?	Letra grande		Cinta de audio	
	TDD		Otro	

Sección II		
¿Está presentando esta queja en su propio nombre?	☐ Sí*	☐ No
*Si respondió "Sí" a esta pregunta, vaya a la Sección III.		
De lo contrario, proporcione el nombre y la relación con la persona en nombre de la que se está quejando:		
Explique por qué hizo la solicitud en nombre de un tercero: _____		
Confirme que tiene el permiso de la parte perjudicada si está presentando una solicitud en nombre de un tercero.	☐ Sí	☐ No

Sección III		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):		
☐ Raza	☐ Color	☐ Origen nacional
Fecha de la presunta discriminación (mes, día, año): _		
Explique lo más claramente posible qué sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de las personas que lo discriminaron (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el reverso de este formulario.		

Rev. 17 de enero de 2020



página 2

Sección IV		
¿Ha presentado previamente una queja de Título VI ante esta agencia?	☐ Sí	☐ No
Sección V		
¿Ha presentado esta queja de Título VI ante algún otro estado federal, agencia local o ante un tribunal federal o estatal?	☐ Sí	☐ No
En caso afirmativo, marque todo lo que corresponda:		
☐ Agencia federal:		
☐ Tribunal federal:	☐ Agencia estatal:	
☐ Tribunal estatal:	☐ Agencia local:	
Proporcione información sobre una persona de contacto en la agencia o tribunal donde se presentó la queja.		
Nombre:		
Cargo:		
Agencia:		
Dirección:		
Teléfono:		
Sección VI		
Nombre de la agencia contra la que se presenta la queja:		
Persona de contacto:		
Cargo:		
Número de teléfono:		

Puede adjuntar cualquier material escrito u otra información que considere pertinente para su queja.

A continuación, se requieren la firma y fecha.

Firma _____ Fecha _____

Envíe este formulario en persona o por correo a la siguiente dirección:

Maryland Transit Administration
Office of Equal Opportunity Compliance Programs
6 Saint Paul Street
Baltimore, MD 21202

Los formularios de queja firmados pueden enviarse por fax a la Oficina de Programas de Cumplimiento de Igualdad de Oportunidades de la MTA al: 410-333-1015.

Rev. 17 de enero de 2020

Appendix B: Title VI Policy Notice

MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Wes Moore
Governor
Aruna Miller
Lieutenant Governor
Kathryn Thomson
Secretary
Holly Arnold
Administrator

TO: All MTA Employees

FROM: Holly Arnold, Administrator Digitally signed by Holly Arnold. Date: 2026.06.03

DATE: June 3, 2026

SUBJECT: Title VI Policy Statement

It is the policy of the Maryland Transit Administration (MTA), in accordance with Title VI of the Civil Rights Act of 1964, as amended, and the Assurance set forth in the Department's Title VI Compliance and Implementation Plan to assure that "no person in [Maryland] 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" for which the MTA receives Federal financial assistance (42 U.S.C. Section 2000d). Furthermore, it shall be the policy of the MTA to ensure that as a recipient of Federal-aid funding, it will ensure nondiscrimination in all of its programs and activities whether federally funded or not. The MTA is steadfast in its commitment to ensure the uniform adoption of this policy.

Accordingly, to ensure compliance with Title VI of the Civil Rights Act and other pertinent directives, the Maryland Transit Administration commits to:

1. Conducting and operating each of its programs and facilities in compliance with all requirements imposed by, or pursuant to, Title VI of the Civil Rights Act and other pertinent directives;
2. Providing nondiscriminatory methods of administration for programs and to give reasonable guarantee that the Maryland Transit Administration, other recipients, sub grantees, contractors, subcontractors, and other participants of Federal financial assistance under such programs will comply with all requirements imposed by Title VI of the Civil Rights Act and other pertinent directives; and
3. Promptly taking any measures necessary to effect compliance with Title VI of the Civil Rights Act and other pertinent directives.

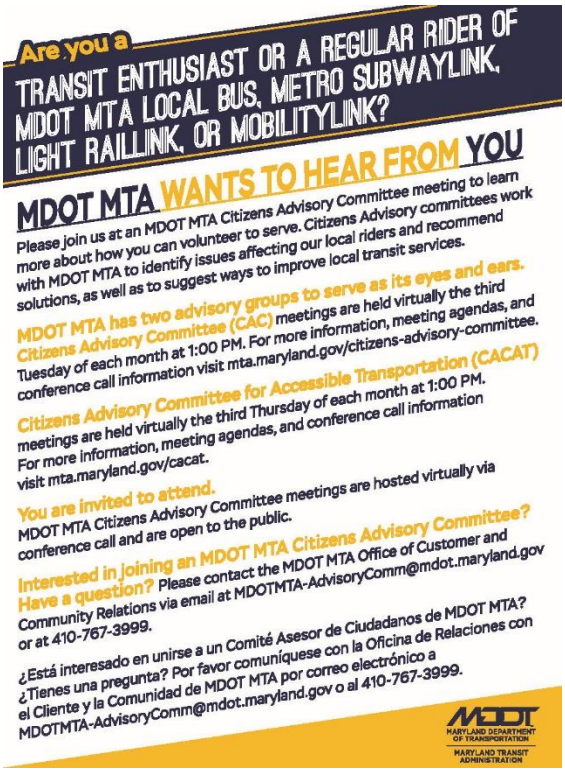
The MTA will include Title VI language in all written contracts and will monitor for compliance when distributing federal aid funds to other transit entities. The MTA's Title VI Coordinator in the Office of Equal Opportunity Compliance Programs is responsible for initiating and monitoring Title VI activities, preparing required reports, and other MTA responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Individuals with questions or requiring additional information relating to this policy or the implementation of the Maryland Transit Administration's Title VI Program should contact the Office of Equal Opportunity Compliance Programs located on the Twentieth Floor, William Donald Schaefer Building, 6 St. Paul Street, Baltimore, MD, 21202 Telephone (410) 767-3944.

401 E. Pratt Street, Baltimore, MD 21202 | 410.539.5000 | 1.866.RIDE.MTA | MD Relay 7-1-1 | mta.maryland.gov

Appendix C: CAC and CACAT Membership Recruitment Materials







Appendix D: Title VI Brochure

Figure 29: Title VI Brochure English Version - Page 1

TITLE VI AND LIMITED ENGLISH PROFICIENCY (LEP)

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency. Executive Order 13166 obligates departments of transportation and sub-recipients to make certain that people of Limited English Proficiency (LEP) have "meaningful access to benefits, services, information, and other important portions" of MDOT MTA's programs and activities.

Who is an LEP Person?

Persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English are considered to have a Limited English Proficiency or "LEP."

What does Title VI Require?

Federal Transit Administration guidance related to LEP individuals requires MDOT MTA to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). MDOT MTA has developed a Language Assistance Plan to address identified needs of the LEP population(s) it serves. For more information on MDOT MTA's language assistance resources, please contact the Office of Equal Opportunity Compliance Programs.



HOW TO FILE A COMPLAINT

Any person who believes that he or she has been individually, or as a member of any specific class of persons, excluded from participation in, denied the benefits of, or subjected to discrimination under any MDOT MTA service, program or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint in accordance with the following procedures. Individuals may file a Title VI complaint up to 180 days from the date of the alleged discrimination, by completing and submitting the agency's Title VI Complaint Form to MDOT MTA's Office of Equal Opportunity Compliance Programs. The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing by fax or online to:

Office of Equal Opportunity & Compliance Programs
MDOT Maryland Transit Administration
6 Saint Paul St., Baltimore, MD 21202-1614*
fax: 410-333-1015*
website: mta.maryland.gov/complaints*

OR

Federal Transit Administration (FTA)
Office of Civil Rights
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, D.C. 20590*

A signed written complaint must be submitted to either agency within 180 days of the alleged discriminatory act.

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

Para mas información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte el departamento enlistado abajo.

MDOT MTA Transit Information Contact Center • 410-539-5000 • 866-743-3682 • TTY 410-539-3497 • MD Relay Users Dial 7-1-1

3202KPS0

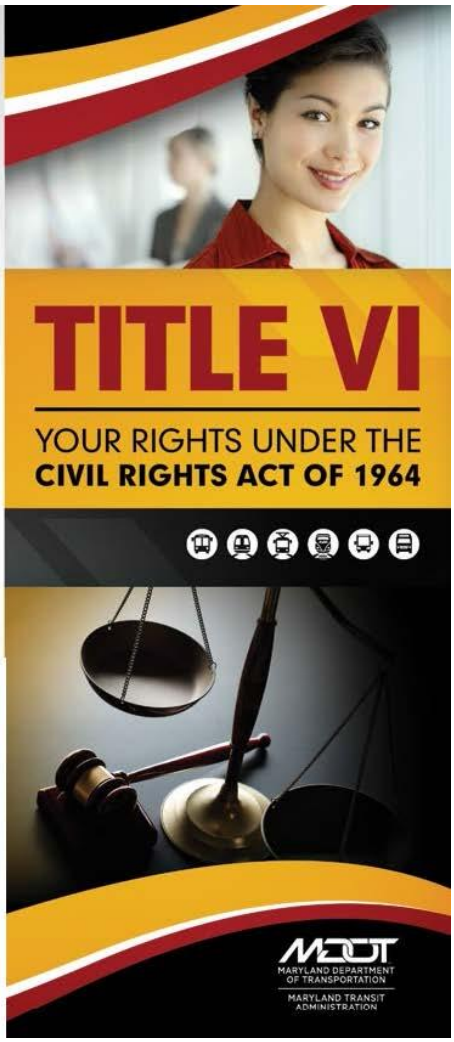


Figure 30: Title VI Brochure English Version - Page 2

TITLE VI | YOUR RIGHTS UNDER THE CIVIL RIGHTS ACT OF 1964

MDOT MTA FAIR PRACTICE POLICY (TITLE VI)

The Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination under any MDOT MTA Service, program or activity on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

WHAT IS TITLE VI OF THE CIVIL RIGHTS ACT OF 1964?

Title VI provides as follows: "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 a program or activity receiving federal financial assistance." [42 U.S.C. 2000d]. In addition to complying with this anti-discrimination prohibition, MDOT MTA and its sub-recipients also consider the effects its services, programs, and activities may have upon minority and low income communities.

DISCRIMINATION PROHIBITED BY TITLE VI

There are many forms of illegal discrimination based on race, color, or national origin that limit the opportunity of minorities and other groups to gain equal access to services, programs, and activities.

Among other things, in operating a federally-assisted program MDOT MTA and its sub-recipients cannot on the basis of race, color, or national origin, either directly or indirectly:

- Deny program services, aids, or benefits
- Provide a different service, aid, or benefit, or provide them in a manner differently than they are provided to others
- Segregate or separately treat individuals in any matter related to the receipt of any services, aid, or benefit.

TITLE VI & ENVIRONMENTAL JUSTICE

On February 11, 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations. The Executive Order provides that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations." In support of Executive Order 12898, the U.S. DOT issued an Order on Environmental Justice (DOT Order 5610.2). This order clarifies and reinforces Title VI and other responsibilities in federally financed transportation projects.

PUBLIC INVOLVEMENT

Another integral component of Environmental Justice is public involvement in the planning and development of transportation projects. MDOT MTA and its sub-recipients provide minority and low-income populations greater access to information on and opportunities for public participation in matters that may impact their health and environment. Public participation is accomplished in a variety of ways such as public hearings, open houses, and community outreach. MDOT MTA strives for public involvement as early as possible in the planning and development stages of major transportation projects.



Figure 31: Title VI Brochure Spanish Version – Page 1

TÍTULO VI Y DOMINIO LIMITADO DEL INGLÉS (LEP)

El Presidente Clinton firmó la Orden Ejecutiva 13166 el 11 de agosto de 2000: Mejorar el acceso a servicios para personas con Dominio Limitado del Inglés. La Orden Ejecutiva 13166 obliga a los departamentos de transporte y sus subreceptores a que se aseguren de que las personas con Dominio Limitado del Inglés (LEP, por sus siglas en inglés) tengan un "valioso acceso a los beneficios, servicios, información y otras porciones importantes" de los programas y actividades de MDOT MTA.

¿Quién es una persona LEP?

Se considera que las personas que no hablan inglés como su idioma principal y que tienen una habilidad limitada para leer, hablar, escribir o entender inglés tienen un Dominio Limitado de Inglés o "LEP."

¿Qué requiere el Título VI?

La guía de la Administración Federal de Transporte relacionada con los individuos LEP requiere que MDOT MTA tome las medidas necesarias para asegurar que las personas que tienen Dominio Limitado de Inglés (LEP) tengan valioso acceso a los beneficios, servicios, información y otras porciones importantes de los sus programas y actividades. MDOT MTA desarrolló un Plan de Asistencia Especial para atender las necesidades identificadas en la población LEP a la que ofrece sus servicios. Para mayor información sobre los recursos de ayuda con el idioma, por favor comuníquese con la Oficina de Programas de Cumplimiento de Igualdad de Oportunidades.



CÓMO PRESENTAR UNA QUEJA

Cualquier persona que crea que ha sido excluida como individuo o como miembro de cualquier clase específica de personas, de su participación en cualquier servicio, programa o actividad de MDOT MTA, se le han negado los beneficios de la misma o ha sido objeto de discriminación, y piense que fue discriminada con base en su raza, color o nacionalidad de origen, tiene el derecho de presentar una queja formal de acuerdo con los siguientes procedimientos. Las personas pueden presentar una queja Título VI, hasta 180 días después de la fecha en que se llevó a cabo la presunta discriminación, al llenar y entregar el Formulario de Queja Título VI de la agencia en la Oficina de Programas de Cumplimiento de Igualdad de Oportunidades. La queja debe incluir la siguiente información:

- Su nombre, dirección y cómo comunicarse con usted (por ejemplo, número de teléfono, dirección de correo electrónico, etc.)
- Cómo, cuándo, dónde y por qué piensa que fue discriminado. Incluya la ubicación, nombres, información de contacto de cualquier testigo.

La queja se puede entregar por escrito vía fax o en línea en:

Office of Equal Opportunity & Compliance Programs
MDOT Maryland Transit Administration
6 Saint Paul St., Baltimore, MD 21202-1614*
fax: 410-333-1015*
Página web: mta.maryland.gov/complaints*

o

Federal Transit Administration (FTA)
Office of Civil Rights
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, D.C. 20590*

***Se debe entregar una queja por escrito firmada, en cualquiera de las dos agencias, dentro de 180 días después del supuesto acto discriminatorio.**

Para más información o para solicitar este documento en un formato alternativo o traducido a otro idioma, por favor contacte al departamento mencionado a continuación.

For more information, or to request this document in an alternate format or translated into another language, please contact the department listed below.

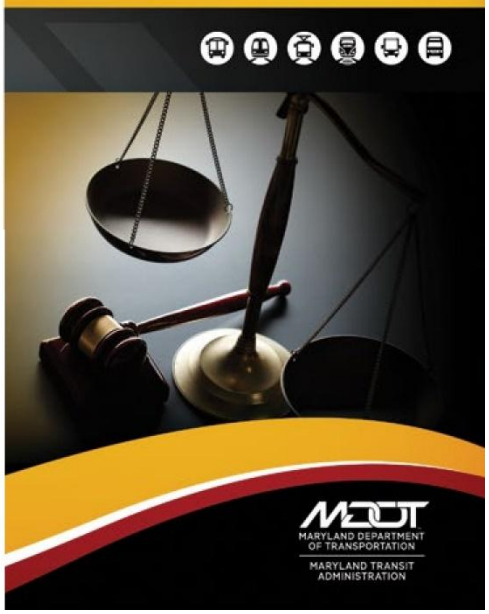
Centro de Contacto de Información de Tránsito MDOT MTA • 410-539-5000 • 866-743-3682 • TTY 410-539-3497 • Usuarios de MD Relay marcar 7-1-1

4/20 2K PS-ID



TÍTULO VI

SUS DERECHOS EN VIRTUD DE LA **LEY DE DERECHOS CIVILES DE 1964**



MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MARYLAND TRANSIT ADMINISTRATION

Figure 32: Title VI Brochure Spanish Version – Page 2

TITLE VI | SUS DERECHOS EN VIRTUD DE LA LEY DE DERECHOS CIVILES DE 1964

POLÍTICA DE PRÁCTICA JUSTA DE MDOT MTA (TÍTULO VI)

La Administración de Tránsito del Departamento de Transporte de Maryland (MDOT MTA) se compromete a asegurar que ninguna persona sea excluida de su participación en, o se le niegan beneficios de, o sea objeto de discriminación en cualquier servicio, programa o actividad de MDOT MTA con base en su raza, color o nacionalidad de origen, como se encuentra protegido en el Título VI de la Ley de Derechos Civiles de 1964.

¿QUÉ ES EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964?

El Título VI estipula lo siguiente: "Ninguna persona en Estados Unidos por motivos de raza, color u origen nacional, será excluida de la participación en, o se le negarán los beneficios de, o será objeto de discriminación en un programa o actividad que recibe asistencia financiera del gobierno federal". [42 U.S.C. 2000d]. Además de cumplir con esta prohibición de discriminación, MDOT MTA y sus subreceptores también consideran los efectos que sus servicios, programas y actividades pueden tener en las minorías y comunidades de bajos recursos.

EL TÍTULO VI PROHÍBE LA DISCRIMINACIÓN

Hay muchas formas de discriminación ilegal con base en la raza, color o nacionalidad de origen que limitan las oportunidades que tienen las minorías y otros grupos de obtener acceso equitativo a servicios, programas y actividades.

Entre otras cosas, al operar un programa asistido por el gobierno federal MDOT MTA y sus subreceptores no pueden con base en la raza, color o nacionalidad de origen y directa o indirectamente:

- Negar programas de servicio, asistencia o beneficio
- Proporcionar un servicio, asistencia o beneficio distinto o proporcionarlos de diferente manera de la que se los proporciona a otras personas
- Segregar o tratar por separado a personas en cualquier asunto relacionado con la recepción de cualquier servicio, ayuda o beneficio.

TÍTULO VI Y JUSTICIA AMBIENTAL

El 11 de febrero de 1994, el presidente Clinton firmó la Orden Ejecutiva 12898: Acción federal para abordar la justicia ambiental en poblaciones minoritarias y poblaciones de bajos ingresos. La Orden Ejecutiva establece que "cada agencia hará que el logro de la justicia ambiental sea parte de su misión al identificar y abordar, según corresponda, los efectos desproporcionadamente altos y adversos para la salud humana o el medio ambiente de sus programas, políticas y actividades en las poblaciones minoritarias y de bajos ingresos." En apoyo de la Orden Ejecutiva 12898, el DOT de los Estados Unidos emitió una Orden sobre Justicia Ambiental (Orden DOT 5610.2). Esta orden aclara y refuerza el Título VI y otras responsabilidades en proyectos de transporte financiados por el gobierno federal.

PARTICIPACIÓN PÚBLICA

Otro componente integral de la Justicia Ambiental es la participación pública en la planeación y desarrollo de los proyectos de transporte. MDOT MTA y sus subreceptores proporcionan a las minorías y poblaciones de bajos recursos mayor acceso a la información y a oportunidades para la participación pública en temas que pueden afectar su salud y medio ambiente. La participación pública se logra en una variedad de formas tal como audiencias públicas, puertas abiertas y alcance comunitario. MDOT MTA se esfuerza para que haya participación pública, tan pronto como sea posible, en las etapas de planeación y desarrollo de importantes proyectos de transporte.



Appendix E: Public Participation Plan Title VI Feedback Form

(Optional)Tell us about yourself.
All information provided is confidential and will not be shared. These questions assist MDOT MTA in ensuring that the public participation process is inclusive and equitable.

What is your race? (Check all that apply):

- ❑ African American/Black
- ❑ American Indian or Alaska Native
- ❑ Asian
- ❑ Hispanic/Latino
- ❑ Native Hawaiian/Pacific Islander
- ❑ Caucasian/White
- ❑ Other (please specify) _____

What is your Annual Household Income?

- ❑ Less than $10,000
- ❑ $10,000 to $14,999
- ❑ $15,000 to $24,999
- ❑ $25,000 to $34,999
- ❑ $35,000 to $49,999
- ❑$50,000 to $74,999
- ❑ $75,000 to $99,999
- ❑ $100,000 to $149,999
- ❑ $150,000 to $199,999
- ❑ $200,000 or more

Is English your first language?

- ❑ Yes
- ❑ No

If English is not your first language, what is the language you speak most often at home?

_____

If English is not your first language, how well do you speak English?

- ❑ Very Well
- ❑ Well
- ❑ Not Well
- ❑ Not at All

If English is not your first language, how well do you read English?

- ❑ Very Well
- ❑ Well
- ❑ Not Well
- ❑ Not at All

How did you hear about the proposed service, program, project, or activity discussed today?

❑ Ad on Vehicle ❑ Station Announcement ❑ Newspaper ❑ MDOT MTA Website ❑ Social Media ❑ Other

- To request this information in an alternate format or another language, please contact the department listed below.
- Para pedir esta información en un formato alternativo o traducido a otro lenguaje, por favor contacte el departamento nombrado abajo.

MDOT MTA Office of Customer and Community Relations
410-767-3999 ● 866-743-3682 ● TTY 410-539-3497 ● Maryland Relay Users Dial 7-1-1

Appendix F: State-Level LAP Requirements (HB 1473)

Background and Timeline for State Requirements

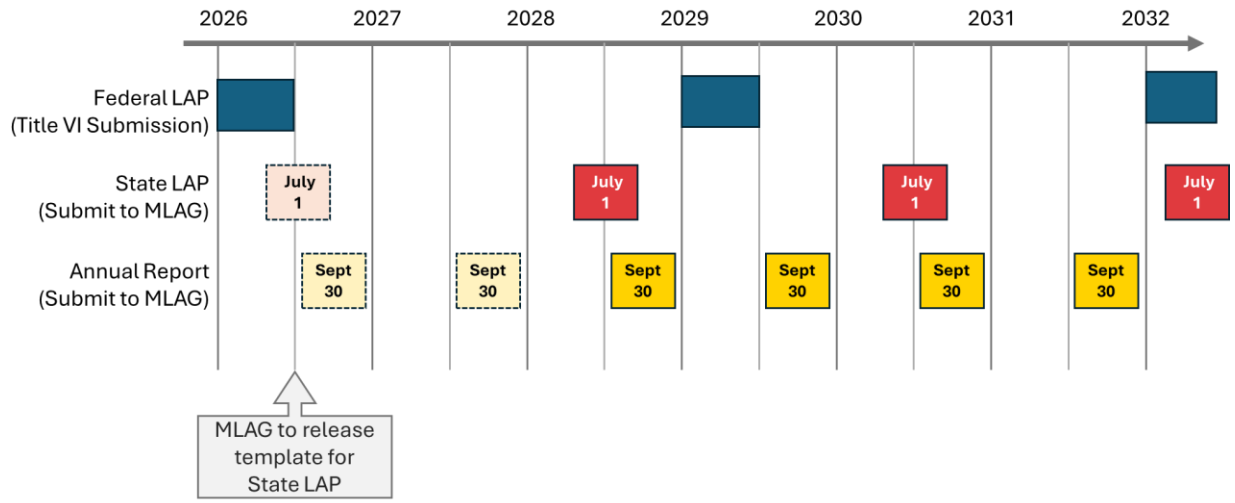
Maryland House Bill 1473 (HB 1473), also titled "State Government - Equal Access to Public Services for Individuals With Limited English Proficiency and Individuals With Disabilities" is state legislation effective October 1, 2025. The bill establishes requirements for the development, implementation, and oversight of Language Access Plans (LAPs) for Maryland state government departments, agencies, and programs. MDOT MTA must achieve compliance with state legislation on or before July 1, 2028.

The legislation also establishes the Maryland Language Advisory Group (MLAG), jointly staffed by the Governor's Office of Immigrant Affairs (GOIA) and the Maryland Department of Disabilities (MDOD). MDOT MTA will create and submit documentation to this group:

- State Language Access Plan – To be submitted bi-annually by July 1
- Annual Monitoring Report – To be submitted annually by Sept 30

Figure 33 shows the timeline of submission periods for Federal Title VI documentation, State LAP documentation, and the State Annual Monitoring Report.

Figure 33: Timeline for MDOT MTA Submission Deadlines for Federal Title VI, State LAP, and State Annual Monitoring Report

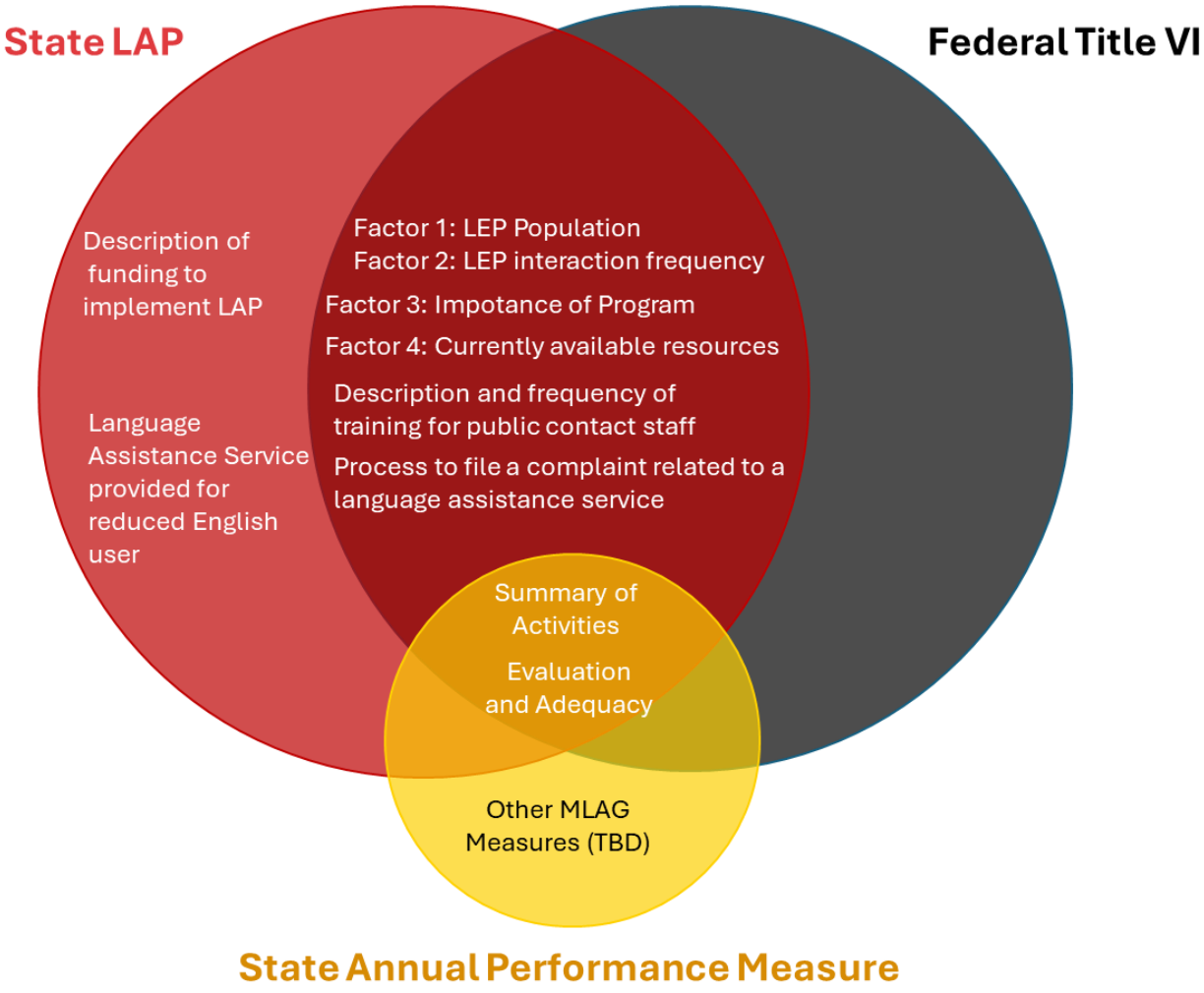


Content Overlap

There is significant overlap between the LAP content developed as part of Federal Title VI documentation and the contents of the State LEP, as laid out in HB 1473. All components from the Federal Title VI documentation are useful for meeting state requirements, and can therefore be carried over to the State LEP. However, HB 1473 introduces additional provisions which may change how MDOT MTA collects and reports information.

Notably, HB 1473 expands the state-level definitions of "Limited English Proficiency" populations to include "a limited ability to read, write, speak, or understand English." Additionally, HB 1473 expands "Language assistance service" to include "additional verbal and interpretation methods, as specified (e.g., sign languages, large print, plain language, etc.)." Figure 34 shows the overlap of content required for Federal Title VI documentation, State LAP documentation, and the State Annual Monitoring Report. MDOT MTA may elect to maintain a single Language Access Plan, updated bi-annually with information satisfying both federal and state requirements, as well as updating the Annual Report each year. Alternatively, MDOT MTA may elect to maintain a single Language Access Plan, updated annually, which contains the Annual Report.

Figure 34: Overlapping Content for Federal Title VI, State LAP, and State Annual Monitoring Report Documentation



Additional Components for State Language Access Plan

Most of the required components of State LAP are available in Federal Title VI documentation. Table 110: State LAP Requirements provides an overview of the State LAP requirements as noted in HB 1473, applicable contents from the Federal Title VI documentation, as well the additional information MDOT MTA will need to collect for the State LAP documentation. MDOT MTA will continue to explore and review best approaches to collecting new information required by HB 1473 in anticipation of the first required State LAP submission deadline of July 1, 2028. Per the state legislation, by June 1 of each year, MLAG will publish a template State LAP. MDOT MTA should monitor these annual releases to inform its approach and ensure alignment with evolving state expectations.

Table 110: State LAP Requirements

State LAP Requirements (Defined in HB-1473)	Applicable Contents from current Title VI	Necessary additional information
Types and descriptions of language assistance services to be provided	Language Access Plan - *Provision of Language Assistance Services by Language, Notice to LEP Persons Regarding Availability of Language Assistance*	Verbal and interpretation methods for reduced English individuals (e.g., sign languages, large print, plain language, etc.).
List and rationale for types of language assistance to be provided, including all languages, dialects, or forms of communication	LAP Factor 1 - *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient* LAP Factor 2 - *The frequency with which LEP persons come into contact with the program*	Number/percentage of reduced-English individuals eligible to be served by, or likely to have an encounter with MDOT MTA
Evaluation and assessment of the adequacy of the language assistance services	Public Participation Plan - *Outreach Strategies Title VI feedback form, Examples of outreach efforts* LAP - *Monitoring, Evaluation, and Updates to Language Assistance Plan*	Project-specific comparisons between planned and completed reach to LEP populations
Description and frequency of training for public contact staff	Training on Language Access	Mode and role specific training practices

Description of the process to file a complaint related to a language assistance service	General Requirements - *Title VI Complaint Procedures*	Mode-specific practices for addressing complaints
Description of the funding and budgetary sources to implement the language access plan	LAP Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach	Overview of Transportation Trust Fund

Additional Components for Annual Monitoring Report

State legislation under HB 1473 requires the submission of an annual report summarizing the previous fiscal year with a summary of all activities performed, performance assessment on meeting the objectives laid out in the biannual State LAP, and explanation of any unmet objectives from the State LAP. Moving forward, MDOT MTA will be paying attention to and working to document these potential measures to submit to this report:

- Reach to LEP, Low-Income, and Minority populations.
- Success of outreach methods for non-English and reduced-English populations.
- Project-specific comparisons between the planned and completed reach to LEP populations.

Additional annual report requirements will continue to be defined by MLAG. With more discussion between the MDOT MTA team and MLAG, a more refined list of measures will be developed in anticipation of the first required submission on Sept 30, 2028.

Appendix G: Equity Analyses

Appendix H, prepared as a separate document, presents the results of equity analyses for all major service changes, fare changes, and/or facility changes implemented since the last Title VI Program submission, along with copies of resolutions demonstrating the governing official's consideration, awareness, and approval of the equity analysis for each of the service, fare, and/or facility changes, as required by FTA C 4702.1B Chap. IV-4. The analyses are presented in chronological order, as listed below in **Table 111**.

Table 111. Service, Fare, and Facility Equity Analyses

Date	Analysis	Change
August 2023	Service Equity	Core Bus Service, Fall 2023 Service Change
June 2025	Service Equity	January 2024 – July 2024 MTA Commuter Bus Service
August 2024	Service Equity	Core Bus Service, Fall 2024 Service Change
December 2023	Service Equity	May 2022 – December 2023 Commuter Bus Service

Appendix H: State Management Plans

MARYLAND STATE MANAGEMENT PLAN

SECTION 5310 (ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES)

Updated July 2025

MARYLAND DEPARTMENT OF TRANSPORTATION

MARYLAND TRANSIT ADMINISTRATION

Office of Planning
6 St. Paul Street
Baltimore, Maryland 21202-1614

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ATTACHMENT A:
Application Forms – Section 5310 (ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES)

I. INTRODUCTION

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) legislation was enacted on August 10, 2005 and authorized the Section 5310 (Elderly Individuals and Individuals with Disabilities. The Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law (BIL), signed into law in November 2021 and effective FY2021 through FY2026, is the current law governing federal surface transportation programs and making major investments in infrastructure, including roads, bridges, transit, and broadband. This legislation continues to authorize the U.S. Secretary of Transportation to apportion funds to each state for Section 5310 grants.

The U.S. Department of Transportation's (DOT) Federal Transit Administration (FTA) that administers the Section 5310 Program, issued Program Guidance Circular C 9070.1G, for this program on April 20, 2015 and updated Circular C 9070.1H on September 2024. These circulars incorporated the current statutory and programmatic requirements and use citations based on the codification of the Federal Transit Act, as amended, and other related federal transit laws into the United States Code and state that designated recipients are required to have an approved State Management Plan (SMP) that describes the State's policies and procedures for administering the Section 5310 Program. In Maryland, the Maryland Transit Administration (MTA) of the Maryland Department of Transportation (MDOT) has been designated by the Governor to receive these funds and administer the program.

On July 6, 2012, President Obama signed into law *Moving Ahead for Progress in the 21st Century (MAP-21)* that went into effect on October 1, 2012. The program changes in this legislation included the repeal of the Section 5316 and 5317 Programs and establishment of an enhanced Section 5310 Program (Enhanced Mobility of Seniors and Individuals with Disabilities) that serves as single formula program to support mobility of seniors and individuals with disabilities.
On June 7 2014, FTA issued a final circular FTA C9070.1G with guidance on the administration and preparation of the transit assistance program for seniors and individuals with disabilities under 49 U.S.C 5310.

Additionally, Fixing America's Surface Transportation (FAST) Act, Pub. L. 114-94, signed into law on December 4, 2015 and effective FY2016 through FY2020

provides guidance on the administration of the 5310 (Elderly Individuals and Individuals with Disabilities) Program and is incorporated here within.

Congress established the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58, also known as the "Bipartisan Infrastructure Law") into law. The legislation reauthorizes surface transportation programs for FY 2022-2026 and provides advance appropriations for certain programs. The Bipartisan Infrastructure Law authorizes up to $108 billion to support federal public transportation programs, including $91 billion in guaranteed funding.

In addition to the authorization of surface transportation programs, Congress also authorized additional support for transit agencies during the COVID-19 public emergency:

The Coronavirus Aid, Relief, and Economic Security (CARES) Act provides $25 billion to transit agencies to help to prevent, prepare for and respond to the COVID-19 pandemic.

On December 27, 2020, the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA), which includes $900 billion in supplemental appropriations for COVID-19 relief, $14 billion of which will be allocated to support the transit industry during the COVID-19 public health emergency

The American Rescue Plan Act of 2021 (ARP), which President Biden signed on March 11, 2021, includes $30.5 billion in federal funding to support the nation's public transportation systems as they continue to respond to the COVID-19 pandemic and support the President's call to vaccinate the U.S. population.

II. PURPOSE OF THE STATE MANAGEMENT PLAN

The Section 5310 SMP is intended to facilitate both MTA's management and FTA oversight by documenting the state's procedures and policies for administering the program. While the SMP is intended to be useful to MTA as well as to subrecipients, its primary purpose is to serve as the basis for the FTA to perform designated

recipient-level management review of the Section 5310 Program, and to provide public information on the MTA's administration of the program.

A. PROGRAM GOALS AND OBJECTIVES

The goals of the Section 5310 Program is to provide 1) assistance in meeting the special transportation needs of seniors and persons with disabilities, 2) service for low income workers to access jobs and employment related activities, and 3) improved mobility for individuals with disabilities through services beyond current Americans with Disabilities Act (ADA) minimum standards.

The program is designed to supplement other capital and operating assistance programs by funding transportation projects for seniors, persons with disabilities, and low-income individuals in all areas -- urbanized, small urban, and rural. The program seeks to enhance coordination of State and federally-assisted programs and services in order to encourage the most efficient use of resources and achieve the programs' goal of improved mobility.

The objectives of the Section 5310 Program in Maryland are to:

- Maximize the use of funds available to the State of Maryland;
- Distribute funds in an equitable and effective manner;
- Promote and encourage applications from a broad spectrum of interested agencies;
- Establish criteria for evaluating applications for program funds;
- Provide technical assistance to organizations through workshops and administrative assistance; and
- Coordinate Maryland's efforts to provide quality human services transportation services by working with appropriate federal, State and local agencies, transit customers and transportation providers to develop a cooperative, coordinated, and human services transportation system.

Overview of Programs

Section 5310 Program

The federal grant funds under the Section 5310 Program provide financial assistance for operating expenses and purchasing equipment to be used to transport seniors and persons with disabilities, and for providing preventative maintenance services for said equipment. Private non-profit corporations and associations are eligible to receive these grant funds for the specific purpose of assisting them in providing transportation services meeting the special needs of seniors and persons with disabilities for whom transportation services are unavailable, insufficient, or inappropriate.

The goal of the Section 5310 Program is to promote effective, efficient, and safe transportation services that enhance the mobility of Maryland's seniors and disabled persons of human service agencies.

B. ROLES AND RESPONSIBILITIES

The principal responsibility and authority for administering the program is with the Governor of Maryland through the designated State agency. The State is responsible for: ensuring adherence to federal program guidelines by all subrecipients, notifying private, non-profit organizations of the availability of the program, developing project selection criteria, determining applicant eligibility, and selecting projects for funding. Each eligible private, non-profit organization must apply directly to the MTA for assistance under this program.

State Coordinating Committee for Human Services Transportation (SCCHST)

MDOT MTA OLTS chairs the State Coordinating Committee for Human Services Transportation (SCCHST), which includes representation from the State's Departments of: Aging; Disabilities; Education; Health & Mental Hygiene; Housing & Community Development; Human Resources; Labor, Licensing, & Regulation; Planning; Transportation; Veterans Affairs; as well as the Governor's Office of the Deaf & Hard of Hearing and the Maryland Developmental Disabilities Council.

The Governor created the SCCHST in October 1997 (Executive Order 01.01.1997.06). It was reconstituted in September 2006 and again in April 2010

(Executive Order 01.01.2006.09; Executive Order 01.01.2010.10). In October of 2023, the SCCHST was codified into law through Senate Bill 511 - Health and Human Services Transportation Improvement Act of 2023. By September 1 each year, the committee must report on its activities to the Governor and the General Assembly and among other specific tasks is to develop a five-year health and human services transportation plan.

The SCCHST examines and plans for the transportation needs of seniors, people with disabilities, and those who need affordable, accessible transportation to get to work, job training, and education programs. To ensure Marylanders continue access to education, health care, jobs, senior citizen activities, and training, the SCCHST prepared and works with MDOT MTA OLTS to update a five-year plan for human services transportation. The SCCHST also coordinates the efforts and resources of Federal, State and local agencies; serves as a clearinghouse for transportation issues; and investigates the need for standards for vehicles and drivers. In addition, the SCCHST participates in planning for the allocation of human services transportation resources for emergency evacuations.

A sub-committee of the SCCHST is responsible for the review, evaluation, and selection of private, non-private organizations for funding under the program. They have developed the criteria and established the process for candidate projects.

MDOT MTA's Office of Local Transit Support

The Governor has designated MDOT MTA to administer the grant application process and program management for Section 5310 Program funds. These responsibilities are to be performed in cooperation with the SCCHST for the Section 5310 Program. Specifically, it is the responsibility of MTA's Office of Local Transit Support (MDOT MTA OLTS) to carry out the effective implementation of the programs, including:

- Statewide grant application development and submission to the FTA.
- Development of program information materials and dissemination to prospective applicants.
- Allocation of available funds in a fair and equitable manner.

- Administration of agreements with individual non-profit organizations, government bodies, and operators of public transportation services approved under the programs, to define the terms and conditions under which the project will be undertaken, in accordance with federal requirements.

- Procurement of all vehicles approved under the program.

- Processing reimbursement payment requests from subrecipients, and preparing requests for federal reimbursement.

- Monitoring and evaluation of the local provision of transportation under the program, including data collection and compilation, reporting to FTA, and ensuring compliance with state and federal regulations.

- Provision of technical assistance to subrecipients to assist them in grants management, compliance, and the provision of safe, effective, and efficient services.

- Administration of grant funds.

In addition to the administration of the Section 5310 Program, the MDOT MTA OLTS provides technical and financial assistance to the Locally Operated Transit Systems (LOTS) serving each of Maryland's 23 counties plus several towns and cities. MDOT MTA OLTS staff is responsible for intergovernmental relations with the LOTS, planning, capital programming, training, regulation and policy compliance, financial management and monitoring, and public relations on behalf of the MDOT MTA in the local communities. The MDOT MTA is responsible for the data collection and compilation from each subrecipient in the State serving the general public. MDOT MTA OLTS leads efforts to coordinate the funding and delivery of specialized transportation services at the State and local level.

While this State Management Plan addresses the FTA requirement to document Section 5310 Program management in Maryland, due to the myriad of responsibilities associated with the the program and other FTA programs the MDOT MTA OLTS provides additional comprehensive guidance to its staff through Standard Operating Procedures, and to its subrecipients through a Section 5310 program manual (MTA 5310 Program Manual) and a Locally

Operated Transit Systems (LOTS) Manual as well as the annual grant application packages.

The MDOT MTA OLTS coordinates with several other offices within MTA and MDOT that have roles in program implementation. Specific program functions that are shared with other offices: The Office of Planning, the Office of Finance, the Office of Procurement, the Equal Opportunity Compliance Program (EOCP), the Office of Engineering, and the Office of Human Resources.

- The Office of Planning (Capital Programming), the Office of Finance, and MDOT MTA OLTS are jointly responsible for the financial elements of grants management - Administration of FTA grant funds under the Section 5310 Program. In general, MDOT MTA OLTS is responsible for most of the administrative functions required for MTA to manage the subgrants with the local subrecipients (including the public transportation providers, private non-profit agencies, and local governments), while the Capital Programming Division is primarily responsible for grant management activities between MTA and FTA (including the administration of all grants for MTA-operated or contracted services). Capital Programming staff tracks the reimbursement requests against the estimated milestone/timeline information provided by the subrecipients in their annual grant applications, sign letters attesting to the availability of funds for State procurements of Section 5310 Program funded vehicles, process Section 5310 Program-funded payments once MDOT MTA OLTS Regional Planners approve an invoice or request for reimbursement, reconcile each grant by line item on a quarterly basis, prepare quarterly Milestone Progress Reports (MPRs). The Office of Finance is responsible for Financial Status Reports (FSRs) for each Federal grant, and submits these reports to FTA. They track the financial payments through the State's and Federal government's systems.

- The Equal Opportunity Compliance Program (EOCP) is responsible for civil rights programs compliance - MTA's EOCP reviews subrecipient Title VI, DBE and EEO programs for compliance with Federal and State requirements and submits these documents to FTA on behalf of those subrecipients meeting Federal thresholds for FTA program submissions. The EOCP also submits Title VI, DBE and EEO programs and reports required for the State as the grantee.

- MDOT is responsible for public outreach on the Program of Projects (POP) - Every fall, the Maryland Secretary of Transportation and MDOT representatives physically visit each County and Baltimore City to distribute and present Maryland's Draft Consolidated Transportation Plan (CTP) in public meetings, a process known as the MDOT/CTP Tours. The CTP is an annual plan that also serves as Maryland's statewide POP for FTA funding. During the tours, members of the public provide comments on the plan and program, as well as input on local priorities. MDOT MTA OLTS staff play a key role in supporting the tours, including documentation of and response to public comments.

- The Programming Division, MDOT, and the MDOT MTA OLTS work together in the development of and amendments to the Statewide Transportation Improvement Program (STIP) - Maryland's STIP is the collection of the CTP along with the regional Transportation Improvement Programs (TIPs) from each metropolitan planning organization (MPO).

- The Office of Procurement is responsible for procuring small buses and other large quantity items granted to subrecipients on a statewide basis.

- The Office of Planning's Environmental Division and Project Development Division provide technical assistance in planning and environmental work related to large scale capital facilities projects.

- The Office of Engineering provides technical assistance and assists with construction oversight on an as needed basis for large scale construction projects being undertaken by subrecipients.

- The Office of Human Resources is responsible for oversight of subrecipients' drug and alcohol programs, reporting, and compliance.

Local Grant Application Process

The Section 5310 grant applications process is tasked to MDOT MTA OLTS. The Section 5310 grant application process is directed by the Program Manager, Human Services. Funding decisions are made by the SCCHST. As noted above,

review, evaluation, and selection of private, non-profit organizations for funding under the Section 5310 program is conducted by the SCCHST. More information on the requirements pertaining to the local Section 5310 Applications can be found in the most recent applicant package that is included in Attachment A.

C. COORDINATION

Coordinated Transportation Planning Requirements

SAFETEA-LU required that projects funded through the Section 5310 Program "must be derived from a locally developed, coordinated public transit-human services transportation plan". In partnership with regional bodies and other key stakeholders the MDOT MTA OLTS facilitated the development of regional Coordinated Public Transit-Human Services Transportation Plans (Coordinated Transportation Plans) through a statewide process that included regional forums, regional planning committees, public meetings, and a project website. Each of these activities incorporated representatives of human service agencies, transportation providers, user groups, and MDOT MTA OLTS .

The locally developed Coordinated Transportation Plans meet the coordinated planning requirements for the program established under SAFETEA-LU, and those included in the proposed guidance for the revised Section 5310 Program. The regional Coordinated Transportation Plans were initially completed in September 2007, and updated in December, 2015, 2019, and are scheduled to be updated in 2026. These plans serve as the basis for selection of projects to be funded through the MTA administered Section 5310, Program. These plans include the identified transportation needs of individuals with disabilities, older adults, and people with low incomes, strategies for meeting these local needs, and potential projects that correspond to each strategy.

Development of the Coordinated Transportation Plans involved a variety of key stakeholders throughout the State, and included:

- Area transportation planning agencies, including Metropolitan Planning Organizations (MPOs), States, and local governments;

- Public transportation providers (including ADA paratransit providers and agencies administering the projects funded under the FTA urbanized and non-urbanized programs);

- Private transportation providers, including private transportation brokers, taxi operators, van pool providers, and intercity bus operators;

- Non-profit transportation providers;

- Past or current organizations funded under the former Job Access Reverse Commute, the Elderly Individuals and Individuals with Disabilities, and/or the former New Freedom programs;

- Human service agencies funding, operating, and/or providing access to transportation services;

- Existing and potential riders, including both general and targeted population passengers (individuals with disabilities, older adults, and people with low incomes);

- Protection and advocacy organizations;

- Representatives from independent living centers;

- Advocacy organizations working on behalf of targeted populations;

- Agencies that administer health, employment, and other support programs for targeted populations;

    - Departments of Social/Human Services
    - Workforce Development
    - Vocational Rehabilitation
    - Health Department/Medicaid Transportation
    - Agency on Aging (AoA)
    - Developmental Disability Council

- Non-profit human service provider organizations that serve the targeted populations;

- Job training and placement agencies;

- Housing agencies;

- Health care facilities;

- Mental health providers;
- Security and emergency management agencies;
- Economic development organizations;
- Faith-based and community-based organizations;
- Representatives of the business community (e.g. employers); and
- Local and State officials and elected officials.

Local and Regional Coordination Planning

Through the development of the Coordinated Transportation Plans that responded to the planning requirements established by SAFETEA-LU, each of five regions in the State established a Regional Coordinated Planning Committee to provide an ongoing format to discuss any local transportation needs, especially those of older adults, people with disabilities, and people with lower incomes. These committees were also charged with updating the Coordinated Transportation Plans as needed, but at a minimum of every three years. The state-level Maryland Coordinated Public Transit-Human Services Transportation Plan (the State Plan) is updated every four years by the MDOT MTA OLTS working in conjunction with the SCCHST and a State Coordinated Planning Committee that includes representatives from each of the five regional planning efforts.

MDOT MTA OLTS also supports coordination at the local and regional level through technical assistance and strategic planning projects.

Maryland Coordinated Community Transportation Website

In conjunction with regional and statewide coordination efforts the MTA provides this website that features links to the regional coordinated transportation plans, information on funding through the MTA administered programs, information on meetings, applications materials, and previous grant awards. This website also includes resources to support mobility management efforts across Maryland. The website is available through the following link: https://marylandcoordinatedplans.com/

ELIGIBLE SUBRECIPIENTS/PROJECTS

Eligible Subrecipients

Section 5310 Program

Eligible applicants for Section 5310 funds are private non-profit corporations that submit either:

- A copy of the Articles of Incorporation filed with the Maryland Department of Assessments and Taxation, or

- A copy of the determination from the U.S. Internal Revenue Service documenting their organization's private, non-profit status.

Although the Federal Section 5310 program permits eligibility of public bodies under certain circumstances, the State of Maryland has determined that public bodies will not be eligible to apply for Section 5310 funds for the following reasons:

- The limited funding available through the Section 5310 program is not adequate to meet the equipment needs of the non-profit organizations now eligible for funding. Approximately 50 percent of those applying each year actually receive funding.

- Non-profit organizations have extremely limited financial resources and few grant programs. Public bodies have access to expanded resources and broader access to grant programs.

Eligible Projects

Section 5310 Program

Funds for the Section 5310 program are available for operating and capital expenses to support the provision of transportation services to meet the specific needs of seniors and persons with disabilities.

Section 5310(b) provides that the amounts apportioned to states and designated recipients, not less than 55 percent shall be available for traditional Section 5310 projects—those public transportation capital projects planned, designed, and

carried out to meet the specific needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate.

Eligible projects for the required 55 percent of capital projects include the capital cost of contracting for the provisions of transit service for seniors and individuals with disabilities and other specialized shared-ride transportation services. The purchase of rolling-stock for or the acquisition of ADA-complementary paratransit service are eligible capital expenses that may also qualify as public transportation capital projects planned, designed, and carried out to meet the specific needs of seniors and individuals with disabilities when public transportation is insufficient, unavailable, or inappropriate provided the project are carried out by eligible subrecipients and the projects are included in the area's coordinated plan.

In addition to the 55 percent traditional projects, up to 45 percent of an area's apportionments may be utilized for additional public transportation projects that:

- Exceed the ADA minimum requirements,
- Improve access to fixed-route service and decrease reliance by individuals with disabilities on ADA-complementary paratransit service, or
- Provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation.

Such projects must be targeted toward meeting the transportation needs of seniors and individuals with disabilities, although they may be used by the general public.

D. LOCAL SHARE AND LOCAL FUNDING REQUIREMENTS

Local share requirements for the Section 5310 Program funds are consistent with FTA matching requirements. The federal share of eligible capital expenses may not exceed 80% of the net project costs, and the federal share of eligible operating expenses may not exceed 50% of the net operating costs.

Match Requirements		
Type of Funding	***Federal Share***	***Local Share***
Capital	80%	20%
Operating	50%	50%

All of the local share must come from sources other than Federal Department of Transportation (DOT) funds. Federal DOT program funds cannot be used as a source of local match for other FTA programs, even when used to contract for service. Applicants are provided with examples of other non-DOT Federal funds that can be used as sources of local match monies, including those highlighted by the federal Coordinating Council on Access and Mobility (CCAM) Program Inventory: https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-program-inventory. Other examples of sources for local match monies that may be used for any or all the local share include local appropriations, dedicated tax revenues, private donations, revenue from human service contracts, and net income generated from advertising and concessions.

E. Project Selection Criteria and Method of Distributing Funds

As per FTA Circulars C 9070.1G (Elderly Individuals and Individuals with Disabilities Program Guidance and Application Instructions and updated C9071.1H, MTA is the State agency designated by the chief executive officer of Maryland charged with developing project selection criteria. In addition, as required by these circulars, the MDOT MTA OLTS conducts a competitive selection process that is separate, but coordinated with, the planning process.

Section 5310 Program

Each local application must be submitted to the appropriate metropolitan planning office/regional coordinating body for review by the deadline indicated in the application package.

The regional Metropolitan Planning Offices (MPO)/Regional Coordinating Bodies (RCB) are as follows:

- Baltimore Metropolitan Council (BMC) - (Annapolis, Baltimore, Carroll, Harford, and Howard Counties and Baltimore City)
- Metropolitan Washington Council of Governments (MWCOG) - (Frederick, Montgomery, and Prince George's Counties)
- Maryland Upper Shore Transit (MUST) - (Caroline, Cecil, Dorchester, Kent, Queen Anne's, and Talbot Counties)
- Tri-County Council for the Lower Eastern Shore of Maryland (TCC)- (Somerset, Wicomico, and Worcester Counties)

- Tri-County Council for Southern Maryland (TCCSMD) - (Calvert, Charles, and St. Mary's Counties)
- Tri-County Council for Western Maryland (TCCWMD – (Allegany, Garrett, and Washington Counties)

The MPOs/RCBs are responsible for reviewing local applications before they are submitted to MDOT MTA and only endorsing those applications that are derived from/included in the current regional coordinated plan. The MPOs/RCBs provide each applicant with a Certificate of Endorsement, which is to be included in the final complete application submission to MDOT MTA. In addition, the MPOs/RCBs forward their recommendations to the MDOT MTA.

The MDOT MTA then reviews the applications to ensure compliance and sends those that are responsive to the 5310 Review Sub-committee of the SCCHST to be scored and ranked for selection.

The SCCHST meets to discuss applications and complete the final scoring process. All Section 5310 applications require sign-off by the SCCHST.

Recipients for funding are selected from the applications received during the bi-annual solicitation process. MDOT MTA OLTS does not use a formula nor impose any limitations on the use of funds.

Only those applications that have received endorsement from their respective MPOs/RCBs will be complete the final scoring process for possible funding recommendations.

Each application is scored on four criteria with a total high score of 50 points possible for an application. Failure to complete any criteria section will result in a score of zero for that section. The criteria are:

1. Extent and Urgency of Local Needs (10 pts.)

   This criterion relates to project justification; i.e. the transportation needs to be met by an agency's proposed project, the urgency of these transportation needs, and the benefits that will accrue to elderly persons and persons with disabilities because of the transportation proposed in the application.

2. Coordination and Cooperation (20 pts.)

   Proposed projects must be derived from the region's Coordinated Transportation Plan. Other considerations include the degree to which the proposed project demonstrates coordination or cooperation among local service agencies and existing transit and paratransit operators. Coordination among agencies serving the elderly and agencies serving persons with disabilities is very important. Coordination may include the sharing of vehicles among agencies, or one agency transporting clients of another agency, or coordinating unused vehicle time with another agency, so that maximum vehicle utilization is achieved. This coordination will also take into consideration projects that do not include vehicles.

3. Vehicle Utilization (10 pts.)

   Refers to the degree to which the service plan provides for the fullest possible utilization of the requested vehicle(s) as well as vehicles currently or proposed to be operated, i.e., ridership projections, miles, and hours of operations, etc. This also refers to proposed operational arrangements for project services.

4. Fiscal and Managerial Capability (10 pts.)

   The degree to which the applicant appears to be capable of conducting the proposed project, with particular reference to the source and availability of both capital and operating funds and to the capacity of the agency for providing an efficient service. In particular, the provision of efficient transportation services, maintenance, driver training, and administrative oversight will be evaluated.

The selection process provides for a broad and equitable approach for selection of recipients for Section 5310 funds that meets the requirements of Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. The MDOT MTA OLTS encourages participation of minority organizations and organizations that serve minority communities in the Section 5310 Program area.

Once the SCCHST has reached a decision on the award of grant funds, the MDOT MTA completes a single State-wide application that includes all the equipment and all necessary information on the successful applicant organizations.

The Statewide application is submitted for Federal approval. Local funding awards are contingent upon Federal funding awarded to the State.

Appeals Process

An applicant whose application was not approved by MDOT MTA OLTS may file a protest to MDOT MTA OLTS within 60 days following notification of non-acceptance.

An applicant that files a protest must send a letter to the Director of the MDOT MTA Office of Local Transit Support explaining the reason for the protest and including a copy of the applicant's FTA Section 5310 application. The Director of MDOT MTA OLTS will officially respond to the Section 5310 protest within 30 days.

F. Annual Program of Projects Development and Approval Process

Application requirements are described in the current Fiscal Year edition of the Section 5310Application that is developed, updated and distributed on a bi-annual basis. The application is transmitted to all current Section 5310 subrecipients in November of the year of the application. A public notice is published through press releases and on applicable websites announcing to the general public and any public or private agency interested in the program. Forms and instruction for completing the forms to apply can be found within each application, and copies of the current applications are included by reference in this SMP and are also provided in Attachment A.

The solicitation of applications is accomplished through the described statewide public notice and a letter announcing the availability of Section 5310. MDOT MTA OLTS has developed an extensive statewide mailing list that is a compilation of the regional Coordinated Public Transit-Human Services Transportation Plans outreach effort, where this mailing list will be updated annually. MTA's Statewide Programs Coordinator (Section 5310 Program) and the Program Manager, Human Services are available for public meetings to discuss the application with eligible recipients.

The application process is described earlier in the SMP. Additional information may need to be included:

- Articles of Incorporation/profit non-profit (for private non-profit or for-profit partners of eligible public applicants)
- Copy of Letter of Exemption IRS Section 501 C (for private non-profit or for-profit partners of eligible public applicants)
- Copies of public notice
- Public hearing information (public applicants only)
- Letter of notice to human service agencies
- List of agencies sent notice
- Letter of notice to regional MPOs/coordinating bodies
- Signed FTA Certifications and Assurances
- Completed Title VI Civil Rights Forms

Public Notice Requirements for Subrecipient Applications

Subrecipients also have public notice requirements as part of developing their applications. All applicants that apply for funding are required to provide an adequate opportunity for public review and comment on a project, and, after providing notice, must provide an opportunity for a public hearing if it is requested. Each Section 5310 applicant is required to publish a public notice of intent to apply for a Section 5310 Program grant. Each applicant must publish a public notice in a local area wide newspaper briefly describing the transportation services your organization is proposing to provide with the vehicle or equipment for which you are applying in this application. Members of the public must be given an opportunity to submit comments on the proposed project to the applicant, and the applicant must respond to any comments received. All such comments and responses must be included as part of the final application.

In addition, each applicant is required to send written notification to transportation providers to ensure that the Section 5310 program does not fund projects that will duplicate or compete with existing services, all transportation providers in the proposed service area of the Section 5310 grant application must be notified in writing, by postal mail, of the intended submittal. Transportation operators to be notified include public transit operators, private transit and paratransit operators such as charter bus and taxi operator, social service operators, particularly those funded previously under the Section 5310 or other Federal programs, and specialized transit operators funded by the Maryland

Statewide Special Transportation Assistance Program (SSTAP). The grant application provides a list of all providers in the proposed service area.

These public notice requirements are detailed in the respective application for Section 5310 Program funds.

Once the comment period has closed, the applicant must make a self-determination if the community has expressed significant economic, social, or environmental concerns about the project. If no concerns are identified, the applicant must complete the public outreach certification contained in the application. If significant concerns are identified during the public comment period, the applicant must conduct a formal public hearing. If a public hearing is required, the applicant should contact their MDOT MTA OLTS representative for details on how to proceed.

Development of the MDOT MTA Program of Projects (POP)

Those projects that are selected are included in the draft FTA Program of Projects (POP) through the following process.

The draft FTA Section 5310 POP is then presented to the Director of MDOT MTA OLTS for review. A Final POP is presented to the MDOT MTA Director of Planning (Capital Programming) for funding consideration. Upon approval by the Director of Planning (Capital Programming) the final POP is presented to the MTA Administrator. Upon the review and approval by the MTA Administrator the FTA Section 5310 POP is submitted to FTA.

After developing the proposed POP, the Director of MDOT MTA OLTS will inform all applicants by correspondence as to whether or not their project(s) are to be funded. Those applicants selected for funding will be notified of their local match requirements after FTA approves the POP.

Following execution of the FTA Section 5310 grants, MTA grant agreements are prepared and executed with each subrecipient.

The Section 5310 Annual POP is included as part of the MDOT's State Transportation Improvement Program (STIP).

STIP/Transportation Improvement Program (TIP) Requirement

Proposed projects must be a product of the metropolitan planning process and/or the statewide planning process specified in 49 CFR Part 613 and 23 CFR Part 450. That is, all transit projects for which Federal funds are expected to be used and that are within metropolitan planning boundaries must be included in a metropolitan TIP approved by the MPO and the chief executive officer of a State and in a STIP that has been approved by FTA and Federal Highway Administration (FHWA). Projects not within metropolitan planning boundaries are required only to be in the STIP. The project application identifies the latest approved STIP (or amendments) containing the project(s), the appropriate page numbers, and a statement identifying the date that FTA and FHWA approved the STIP (or STIP amendment) that contains the proposed project(s). Projects listed in the TIP and STIP must be derived from and consistent with the State's Long-Range Plan. If a project is selected and is part of an MPO, it must be included in the local TIP. However, if a project is outside of an MPO, MTA's Office of Planning (Capital Programming) ensures that the project is included in the STIP.

G. ADMINISTRATION, PLANNING, AND TECHNICAL ASSISTANCE

The MDOT MTA OLTS will use funds from the Section 5310 Program (up to the ten percent limitation) for program administration, planning and technical assistance. These funds may be utilized for staff salaries for time related to the planning and administration of these programs. In addition, funding may be used for outside consultants to perform tasks related to the implementation of these programs, including activities related to the development of state procedures for review and evaluation, reporting and reimbursement, FTA program compliance review, contract development, training, and drug and alcohol review/compliance. The MDOT MTA OLTS will be administering these programs and will be available to provide technical assistance to subrecipients, and subrecipients will be eligible for the on-going MDOT MTA OLTS training for rural and small urban transit systems, including required passenger assistance training, drug and alcohol training (if required), and appropriate specialized training provided on an as needed basis. If subrecipients need additional local project planning or assistance, they can apply to MDOT MTA OLTS for additional funding.

H. FLEXIBLE FUNDING

Flexible funds are certain legislatively specified funds that may be used either for transit or highway purposes. MDOT may transfer Surface Transportation Program (STP) funds, Congestion Mitigation and Air Quality (CMAQ) funds, and certain other flexible funds, from FHWA to FTA to use for transit projects. The funds may be transferred for any non-operating purpose eligible under FTA's Urbanized Area Formula Program (Section 5307), the Elderly Individuals and Individuals with Disabilities Program (Section 5310) and the Nonurbanized Area Formula Program (Section 5311), including preventive maintenance and project administration. The primary flexible fund programs are the STP, and the Congestion Mitigation and Air Quality (CMAQ) Improvement programs, although other programs have some limited intermodal flexibility. Opportunities for transfer of FHWA funds to FTA-sponsored programs will be considered by MDOT/MTA on a case-by-case basis.

Congestion Mitigation and Air Quality (CMAQ)

The primary purpose of the CMAQ program is to improve air quality in areas designated by the U.S. Environmental Protection Agency (EPA) as "nonattainment" areas. Because CMAQ funds are intended to improve air quality, funds must be spent in nonattainment or maintenance areas. A nonattainment area is an area formally designated by EPA as not meeting the National Ambient Air Quality Standards (NAAQS). A maintenance area is an area that was nonattainment but has subsequently attained the NAAQS and officially designated to attainment by EPA. CMAQ funds may be used for transit capital projects and operating expenses for new service. Funds may only be used in nonattainment and maintenance areas and projects must demonstrate an air quality benefit. Operating assistance is limited to new or expanded transportation service and is limited to three (3) years.

Surface Transportation Program (STP)

The primary purpose of STP funds is for construction, reconstruction, rehabilitation, resurfacing, restoration, and operational improvements for highways and bridges including construction or reconstruction necessary to accommodate other transportation modes. Capital costs of transit projects that are eligible under 49 U.S.C. 53, including vehicles and facilities, publicly or privately owned, that are used to provide intercity bus service; carpool projects and fringe and corridor parking facilities; transit safety infrastructure improvements and

programs; transit research, development and technology transfer; surface transportation planning programs; or public transportation management systems under 23 U.S.C. 303.

I. PRIVATE SECTOR PARTICIPATION

In addition to the subrecipient application public notice requirements described earlier in this SMP, to ensure that the Section 5310 Program does not fund projects that will duplicate or compete with existing services all transportation providers in the proposed service area of the Section 5310 grant application must be notified of grant submittal in writing. All providers in the proposed service area must be informed of the proposed service to determine whether they can provide the proposed service in an appropriate manner at a sufficient level. This notification must be postmarked using regular mail in a time period sufficient for transportation providers to inspect the grant application for capital funds and comment upon the intended service prior to submission to the ICST.

Operators to be notified include:

- Public transit operators funded under FTA Section 5307 or 5311;
- Private transit and paratransit operators such as charter bus and taxi operators;
- Social service operators, particularly those funded previously under the FTA Section 5310 program or other federal programs; and
- Transit operators funded by the Maryland Statewide Special Transportation Assistance Program (SSTAP).

In the event a private provider has indicated that they can provide the same service, the applicant must examine the feasibility of purchasing transportation services from the private sector. Should private transportation providers raise any objections, the applicant will address them during the application process. MDOT MTA OLTS staff will review all objections to the application/program as well as the applicant's response.

Complaints regarding involvement of private providers in the local project development process and in the provision of service must be submitted in writing to

the local applicant from the private operator. The local applicant will arrange a meeting within 15 days after receiving the written comments with the private provider and appropriate local officials to discuss these concerns. This meeting will be open to the public and minutes will be taken. The local applicant will submit his/her decision in writing within 15 days after the meeting. All written comments, correspondence, and meeting minutes must be submitted to the MDOT MTA OLTS.

The decisions made by the local applicant as a result of this are final; however, the private provider has the right to challenge the decision made by the applicant to the MDOT MTA OLTS . Review by the MDOT MTA OLTS will be limited to violations of applicable State and/or Federal law or regulations and violation of the local applicant's protest procedures or failure to review a complaint or protest. The MDOT MTA OLTS will not review procedural protests prior to the disposition of complaints at the local level.

Complaints arising after the award of services to a provider, or a decision not to award such services, will use the subrecipient's established bid protest procedure (which is part of the procurement requirements for subrecipients).

J. CIVIL RIGHTS

MDOT MTA OLTS requires that all Section 5310 recipients certify through the annual application process that they are in compliance with all applicable Civil Rights statutes and implementing regulations associated with the programs, including but not limited to the following as outlined in the 2007 FTA circulars for the program and updated to reflect the those listed in the 2013 draft Section 5310 circular:

a. Nondiscrimination in Federal Transit Programs. The recipient agrees to comply, and assures the compliance of each third party contractor at any tier and each subrecipient at any tier under the Project, with the provisions of 49 U.S.C. 5332. These provisions prohibit discrimination on the basis of race, color, religion, national origin, sex, age, and disability, and prohibit discrimination in employment or business opportunity.

b. Nondiscrimination on the Basis of Disability. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the project, with the applicable laws and regulations, discussed below, for nondiscrimination on the basis of disability.

(1) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), prohibits discrimination on the basis of disability by recipients of Federal financial assistance.

(2) The ADA, as amended (42 U.S.C. 12101 et seq.), prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities, as well as imposes specific requirements on public and private providers of public transportation.

(3) DOT regulations implementing Section 504 and the ADA include 49 CFR parts 27, 37, 38 and 39. Among other provisions, the regulations specify accessibility requirements for the design and construction of new transportation facilities and vehicles; require that vehicles acquired (with limited exceptions) be accessible to and usable by individuals with disabilities, including individuals using wheelchairs; require public entities (including private entities "standing in the shoes" of a public entity as a subrecipient or under a contract or other arrangement) providing fixed-route service to provide complementary paratransit service to individuals with disabilities who cannot use the fixed-route service; and include service requirements intended to ensure that individuals with disabilities are afforded equal opportunity to use transportation systems.

(4) Providers of demand responsive service must utilize accessible vehicles, as defined at 49 CFR 37.7 or meet the applicable equivalent service standard. For private and public entities, the service must be equivalent in regards to schedules, response times, geographic areas of service, hours and days of service, availability of information, reservations capability, constraints on capacity or service availability, and restrictions based on trip purpose.

(5) Providers of fixed route service must generally utilize accessible vehicles. Private entities may utilize non-accessible vehicles if they can provide equivalent service in terms of schedules and headways, in addition to the equivalent service requirements described above for demand responsive service. Public entities must also provide complementary paratransit service to fixed route service as defined in 49 CFR 37.121.

(6) In addition, recipients of any FTA funds should be aware that they also have responsibilities under Titles I, II, III, IV, and V of the ADA in the areas of employment, public services, public accommodations, telecommunications, and other provisions, many of which are subject to regulations issued by other Federal agencies.

c. Nondiscrimination—Title VI. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the Project, with all of the following requirements under Title VI of the Civil Rights Act of 1964

(1) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d et seq.), 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;

(2) U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21;

(3) FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." This document provides FTA recipients and subrecipients with guidance and instructions necessary to carry out DOT Title VI regulations (49 CFR part 21);

(4) U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005). This guidance clarifies the responsibilities of recipients of Federal financial assistance from DOT and assists them in fulfilling their responsibilities to LEP persons, pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166;

(5) FTA Circular 4703.1 "Environmental Justice Policy Guidance for Federal Transit Administration Recipients." This document provides FTA recipients and subrecipients with guidance and instructions necessary to carry out U.S. DOT Order 5610.2 to Address Environmental Justice in Minority Populations and Low-Income Populations, and Executive Order 12898 on Environmental Justice that describes the process that the Office of the Secretary of Transportation

and each operating administration will use to incorporate environmental justice principles into existing programs, policies, and activities.

(6) U.S. DOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations. DOT Order 5610.2 describes the process that the Office of the Secretary of Transportation and each operating administration will use to incorporate environmental justice principles (as embodied in Executive Order 12898 on Environmental Justice) into existing programs, policies, and activities;

d. Equal Employment Opportunity. The recipient agrees to comply, and assures the compliance of each third party contractor and each subrecipient at any tier of the project, with all equal employment opportunity (EEO) requirements of Title VII of the Civil Rights Act of 1964, as amended, (42 U.S.C. 2000e), and with 49 U.S.C. 5332 and any implementing regulations DOT may issue.

e. Nondiscrimination on the Basis of Sex. The recipient agrees to comply with all applicable requirements of Title IX of the Education Amendments of 1972, as amended, (20 U.S.C. 1681 *et seq*.), with DOT implementing regulations, "Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance," 49 CFR part 25.

f. Nondiscrimination on the Basis of Age. The recipient agrees to comply with all applicable requirements of the Age Discrimination Act of 1975, as amended, (42 U.S.C. 6101 *et seq*.), and Department of Health and Human Services' (DHHS') implementing regulations, "Nondiscrimination on the Basis of Age in Programs or Activities Receiving Federal Financial Assistance," (45 CFR part 90), which prohibit discrimination against individuals on the basis of age. In addition, the recipient agrees to comply with all applicable requirements of the Age Discrimination in Employment Act (ADEA), 29 U.S.C. 621 through 634, and Equal Employment Opportunity Commission (EEOC) implementing regulations, "Age Discrimination in Employment Act" (29 CFR part 1625), which prohibit employment discrimination against individuals on the basis of age.

g. Disadvantaged Business Enterprise (DBE). To the extent required by Federal law, regulation, or directive, the recipient agrees to take the following measures to facilitate participation by DBEs:

(1) The recipient agrees and assures that it will comply with MAP-21 Section 1101(b) (23 U.S.C. 101 note), which directs the Secretary of Transportation to expend not less than 10 percent of authorized federal funds with DBE's. This 10 percent national goal is aspirational and is used by the Department of Transportation to help monitor and evaluate DBE participation in DOT assisted contracting opportunities.

(2) The recipient agrees and assures that it will comply with DOT regulation, "Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs," 49 CFR part 26. Among other provisions, this regulation requires certain recipients of DOT Federal financial assistance, namely State and local transportation agencies, to establish goals for the participation of disadvantaged entrepreneurs and certify the eligibility of DBE firms to participate in their DOT-assisted contracts.

The recipient agrees and assures that it shall not discriminate on the basis of race, color, sex, or national origin, in the award and performance of any third party contract, or sub-agreement supported with Federal assistance derived from DOT, or in the administration of its DBE Program, and will comply with the requirements of 49 CFR part 26. The recipient agrees to take all necessary and reasonable steps set forth in 49 CFR part 26 to ensure nondiscrimination in the award and administration of all third party contracts and sub-agreements supported with Federal assistance derived from DOT. As required by 49 CFR part 26 and approved by DOT, the recipient's DBE Program is incorporated by reference and made part of the Grant Agreement or Cooperative Agreement. The recipient agrees that implementation of this DBE Program is a legal obligation, and that failure to carry out its terms shall be treated as a violation of the Grant Agreement or Cooperative Agreement. Upon notification by DOT to the recipient of a failure to implement its approved DBE Program, DOT may impose sanctions as provided for under 49 CFR part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001, and/or the Program Fraud Civil Remedies Act, (31 U.S.C. 3801 *et seq*).

K. SECTION 504 AND ADA REPORTING

Each applicant will sign a certification that it has reviewed the policies, practices,

and facilities used in the provision of transportation services in order to fulfill the requirements of the ADA, 49 U.S.C. 322, and the implementing regulations of the FTA, 49CFR Part 37 and 38.

L. PROGRAM MEASURES

In accordance with state and federal requirements, each subrecipient must report financial and operating data on the use of funds and equipment purchased with Section 5310 Program funds on a quarterly basis. The reporting forms must be submitted to MDOT MTA OLTS electronically, no more than 45 days after each quarter, in support of the Quarterly Request for Payment (if applicable for operating, preventive maintenance, and mobility management projects).

- Quarterly reports on Operating projects, as well as ongoing Capital projects including preventive maintenance, information-based services, and mobility management activities, must submitted until all grant funds are expended and the grant is closed out (typically 1-2 years).
- Quarterly reports on use of vehicles purchased under a Capital grant must be submitted until there is no longer an MTA security lien on the title of vehicle to the subrecipient (typically at least 6 years for small buses and at least 4 years for smaller vehicles). Once an MTA/FTA-funded vehicle has reached the end of its useful life and has been retitled to your agency, it no longer needs to be reported except in the context of questions addressed to your agency's client transportation program as a whole.

Section 5310 has a separate quarterly reporting form tailored to include the specific items the FTA requires for the funding source, in addition to general questions common to all programs. The items unique to the Section 5310 Program are described below.

Section 5310 Program-Specific Measures:

- Gaps in Service Filled: Provision of transportation options that would not otherwise be available for older adults and individuals with disabilities measured in numbers of older adults and people with disabilities afforded mobility they would not have without program support.

- Ridership: Actual or estimated number of rides (as measured by one-way trips) provided annually for individuals with disabilities and older adults on Section 5310—supported vehicles and services.

M. DESIGNATED RECIPIENT PROGRAM MANAGEMENT

MTA has the responsibility for the State's Section 5310 Program. The MDOT MTA OLTS has been assigned this responsibility and the Director of OLTS has the overall responsibility for the Section 5310, Program. At MDOT MTA the OLTS performs program management functions through the efforts of the Program Manager, Human Services, with assistance from the RP's when appropriate.

The three positions have varying roles in the Section 5310, program. As can be seen, they perform specialized overall program functions and state-level roles with regard to the Section 5310 Program:

1. Updating the TIPs with regard to Section 5310 projects;

2. Distributing the local grant application package;

3. Project review to ensure consistency with adopted Public Transit-Human Services Transportation Plan;

4. Management of the project evaluation and selection process for Section 5310;

5. Conveying program requirements to local grantees and third-party operators;

6. Notification of the non-participating but eligible agencies of availability of Section 5310 funding for the upcoming year;

7. Review of reimbursement requests for projects under these programs;

8. Provision of technical assistance to local subrecipients on questions and issues that arise during the course of program administration;

9. Monitoring compliance with FTA and MDOT MTA OLTS program requirements, including Drug and Alcohol program compliance;

insurance compliance; reporting and financial compliance, civil rights, and

10. Attending regional coordination meetings when required to support projects under Section 5310.

a) Procurement

All procurement activities are the responsibility of the subrecipient. However, the MDOT MTA OLTS conducts a centralized procurement for vehicles funded by the Section 5310 program, requiring subrecipients to participate in the state procurement of vans and small buses rather than procuring FTA grant-funded vehicles locally.

Subrecipients can use the procurement procedures of their jurisdiction as long as they conform to the minimum standards prescribed by the MDOT MTA OLTS and FTA Circular 4220.1G to ensure full and open competition and equitable treatment of all potential sources in the procurement process. In addition, the subrecipient must maintain a contract administration system that ensures that all procurements funded wholly or in part with Section 5310 funds are done in accordance with MDOT MTA OLTS and federal regulations.

The MDOT MTA OLTS has adopted the procurement requirements and standards delineated by FTA for the Section 5310 subrecipients in Maryland with the following exception: the State small purchase threshold is $50,000. For projects over $50,000 the subrecipient must pursue the same methods of procurement that are followed for FTA-funded projects that are $100,000 or more as described in Circular 4220.1G.

For projects up to $50,000 (State limit), the subrecipient must solicit price or rate quotations from an adequate number of sources; the State requires at least two and preferably three quotes.

The State categorizes small procurements as follows, each with its own procurement guidelines:

- **Category I (known as Micro-purchases under Federal methods):** For purchases valued up to $5,000 for operating and $1,000 for capital, oral or written solicitation may be used. A written purchase order or contract is required if written solicitation is used. The subrecipient is responsible for ensuring that the price is fair and reasonable, and is encouraged to distribute multiple purchases equitably among local qualified suppliers. The basis for the award should be the judgment of the subrecipient's procurement officer. Once a subrecipient has identified a preferred vendor, MDOT MTA OLTS concurrence is required prior to the issuance of a purchase order.

- **Category II:** for procurements more than $5,000 for operating and more than $1,000 for capital but not more than $15,000, oral or written solicitation may be made. A written purchase order or contract is required for Category II small procurements.

- **Category III:** for procurements more than $15,000 but not more than $50,000, written solicitation must be made (although it may be supplemented by oral solicitation), and the solicitation must be posted on the eMaryland Marketplace.

All of these categories require an Independent Cost Estimate (ICE).

For all items purchased with Section 5310 Program funds, as well as for all items purchased through sealed bids, competitive proposals, or noncompetitive negotiations exceeding $1,000 for purchases funded by capital grants, and $5,000 for purchases funded by operating grants, the MDOT MTA OLTS must review and concur with the solicitation documents prior to publication and the initiation of the procurement process. The MDOT MTA OLTS must also concur in writing with the recommendation for award prior to the execution of a local contract or purchase order for all items purchased through the methods mentioned previously. The MDOT MTA OLTS will defer to the local subrecipient's procurement requirements if theirs are more stringent than the State's requirements.

b) Financial Management and Accounting Procedures

The MDOT MTA OLTS provides for fiscal controls and accounting procedures in accordance with State laws and in compliance with all FTA requirements.

Information received from subrecipients provides detailed information on expenditures and services provided in support of projects for payment for Section federal funds. The grant agreements held with subrecipients require that all funds be expended and accounted for as required by Federal, State, and Local Law. Closeouts of subrecipients are conducted upon receipt of all final requests for payment and supporting information.

c) Property Management

Real property and equipment are all tangible, non expendable property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit. The Title (if applicable) to all equipment must be vested in the name of the local recipient.

Property records must be maintained by the local recipient that includes a description of the equipment, a serial number or other identification number, the source of property, title, the acquisition date, the cost of the equipment, percentage of Federal/State participation in the cost of the equipment, grant or project number, the location, use and condition of the equipment, and any disposition date, including the date of disposal and sale price of the equipment. A compilation of all local recipient's real property will be maintained by the MDOT MTA OLTS in a master list. This list will be updated every year by cross referencing property records that are submitted within the annual ATP and comparing it to MDOT MTA OLTS 's master real property list.

A physical inventory of real property and equipment must be taken and the results reconciled with the property records at least once every two years. The Section 5310 applications also contains the FTA Certifications and Assurances requiring the applicant to have satisfactory continuing control over the use of project equipment and facilities. As part of their review of the annual applications, MDOT MTA OLTS staff will analyze 1) the previous awards made and 2) whether the capital still holds value to

warrant listing. Staff will validate presence and condition of equipment during annual site visits.

A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of equipment. Any loss, damage, or theft shall be investigated. Adequate maintenance procedures must be developed to keep the property in good condition. In cases of accidental or casual loss of project equipment, fair market value shall be deemed the value of the equipment prior to its destruction. The local subrecipient must reinvest the insurance proceeds from the settlement for public transit purposes.

The MDOT MTA OLTS also requires a Facility Maintenance Plan for all federally funded facilities and equipment. Specifically, the plan needs to:

- Identify the facilities and equipment that are to be maintained;
- Define an organization and assign responsibility for on-going maintenance;
- Assign a series of inspections and routine maintenance actions to be performed at appropriate intervals; and
- Prescribe a record-keeping system that maintains adequate permanent records of maintenance and inspection activity for each building and equipment.

Before final reimbursement for a new facility, local recipients must submit a Facility Maintenance Plan to MDOT MTA OLTS for approval.

d) Vehicle Useful Life and Replacement Standards

Minimum Useful Life Standards

To ensure that vehicles are adequately maintained and remain in service for their normal service life, the MDOT MTA OLTS has established minimum useful life standards for vehicles funded with state or federal funds. These standards apply to all vehicles purchased with Sections 5307, 5309/5339, 5310, 5311, 5316, 5317, and State funds, and to all vehicles that will be replaced with vehicles funded from these programs, regardless of the initial funding source.

Service-life begins on the date the vehicle was placed in service and continues until it is removed from service.

Classification	Yrs.	Miles	LENGTH
Revenue Specialized Vehicles (Accessible Minivans, Vans, Accessible Taxicabs & Sedans)	4 years	100,000	n/a
Light Duty Bus	5 years	150,000	25' - 35'
Medium Duty Bus	7 years	200,000	25' - 35'
Heavy Duty Bus-Medium Size	10 years	350,000	30' – 35'
Heavy Duty Bus-Large Size	12 years	500,000	Over 35'
Non-Revenue Specialized/ Fleet Support Vehicles (Pick-Up Trucks, Utility Vehicles & Sedans)	10 years	200,000	n/a

Useful life for trolley-buses (simulated, with rubber tires and internal combustion engines) is determined using the above useful life classifications.

Vehicle Classifications

If there is ever a question about what a certain vehicle's classification might be, the Altoona Test used for that vehicle is always the substantiating documentation as to its classification.

Although a minimum standard for useful life is adopted, additional information about the condition of the vehicle is necessary for all replacement requests. Vehicles will not be replaced based solely on age and accumulated mileage, therefore details such as repair records or estimated repair costs must be provided with the request. Also, it is important to note that if a vehicle is out of service/not being utilized for an extended period of time, the subrecipient must contact MDOT MTA OLTS to determine how this will affect the vehicle's useful life criteria.

Below is minimum information that is requested to submit for a replacement vehicle, using forms provided in the annual grant application.

- Fleet Vehicle Number,
- Present Mileage,
- Vehicle Identification Number and delivery date (if the vehicle to be replaced was purchased under a previous Section 5307, 5339, 5310, 5311, or State grant),
- A description of the condition of the vehicle to be replaced, including the reasons for replacing the vehicle at this time, and
- An indication of how the vehicle will be disposed of (sell, salvage, or used as backup or other). NOTE: any insurance proceeds received for this vehicle will be deducted from MTA's state and federal portion of the eligible cost of a replacement vehicle.

Replacement Prior to Meeting Minimum Useful Life Criteria

The MDOT MTA OLTS considers the value prior to the end of normal useful-life to be based on straight line depreciation and that removal of an MDOT MTA OLTS funded vehicle before the end of its normal service life, for any reason, requires notification to the MDOT MTA OLTS. The subrecipient must describe the circumstances necessitating the replacement of the vehicle. The subrecipient would need to complete the information above, in addition to providing the following information:

- A list of any repairs that will be required to keep the vehicle in service, and an estimated cost of each repair,
- A description and cost of repairs made to the vehicle to date (attach the repair and preventive maintenance records, if available).

Upon notification, the MDOT MTA OLTS will determine whether it retains further interest in the vehicle and whether reimbursement of the federal/state share of its remaining value must take place. For FTA/MTA-funded vehicles, after the normal service life is met, the MDOT MTA OLTS no longer retains a financial interest in the vehicle.

Vehicle Status Monitoring

The MDOT MTA OLTS monitors vehicles funded through the Section 5310 Program. "Active" vehicles are those for which the MTA is a lien holder on the title. This is required until a vehicle reaches its useful life standard as outlined above. After the normal service life is met, the MDOT MTA no longer retains a financial interest in the vehicle. The subrecipient is then required to re-title the vehicle, removing MDOT MTA from the title. Any Proceeds from the sale or disposal of the re-titled vehicle, is required to be re-invested by the agency back into the agency's transportation program. If proceeds are greater than $10,000, they must be used to towards the Federal share for a future bus replacement and need FTA approval prior to doing so. MDOT MTA will request concurrence from FTA.

e) Maintenance and Disposition

All Section 5310 subrecipients, except where specifically exempted by State law, must register and comply with the regulations of the Maryland Public Service Commission, including vehicle inspection and maintenance standards. All operators of vehicles with capacity for ten or more passengers must comply with the Maryland Preventive Maintenance Program. Each vehicle must carry a certification documenting that preventive maintenance and inspections are performed and in compliance. In addition, all Section 5310 subrecipients receiving vehicles must submit their preventive maintenance program to the MDOT MTA OLTS with their application.

All subrecipients need a proper vehicle disposition policy that is approved by the MDOT MTA OLTS . The subrecipient may not dispose of vehicles and other equipment at the end of their useful life until after notifying and receiving disposition instructions and concurrence from the MDOT MTA OLTS .

f) Evaluation and Monitoring

Monitoring is necessary to ensure that the MTA's subrecipients meet Federal and State requirements. While the local subrecipients are required to sign and submit annual certifications and assurances to the MDOT MTA

OLTS , the MDOT MTA OLTS actively examines all subrecipients to ensure that funds are being used as intended.

Monitoring local subrecipients serves several functions, including review of compliance with Federal and State requirements and review of LOTS service performance. Monitoring ranges from informal observation and review, to auditing compliance with Federal and State requirements, to enforcement of requirements in which a subrecipient is found to be deficient.

MTA conducts oversight of the Section 5310 subrecipients through the following procedures:

1. Reporting Requirement: To provide for the efficient administration of the Section 5310 Programs, subrecipients must report basic operating and financial data on at least a quarterly basis, as described earlier in this SMP.

2. Subrecipient Annual Grant Applications: The MDOT MTA OLTS requires each subrecipient to submit a grant application providing detailed program description and information demonstrating compliance with federal and state requirements, certifications and assurances.

3. Subrecipient Compliance Reviews. The MDOT MTA OLTS maintains a policy of conducting full compliance reviews of each of the Section 5310 Program subrecipients in the State of Maryland. These reviews occur every three to five years to ensure FTA program requirements are being followed.

4. On-Site Visits: Periodic site visits are conducted by MDOT MTA OLTS staff to provide technical assistance and to review program accomplishments and management. During these visits MDOT MTA OLTS staff will also monitor subrecipient's maintenance of federally funded vehicles and facilities (where applicable). Specifically for vehicles, spot checks will be made by pulling vehicle records to ensure that they comply with the state standards and guidelines – required to meet manufacturer's established maintenance intervals.

5. Identification of Subrecipient's Common and Program-specific Deficiencies. On an ongoing basis, the MDOT MTA OLTS will review all compliance oversight activities that have occurred over the prior year to identify common and program specific deficiencies found for its subrecipients. The review will help determine new training opportunities, outstanding subrecipient deficiency findings for follow-up and new areas of compliance emphasis at quarterly meetings.

6. Establishing and Maintaining an Active Review Process. MDOT MTA OLTS will ensure subrecipients implement timely actions and plans required to resolve deficiencies identified in the specific FTA program requirement reviews by establishing achievable and mutually agreed deadlines, conducting as-needed and programmed status meetings, and providing sample templates and acceptable program specific information to subrecipients. Subrecipient failure to meet deadlines will be reviewed on a case-by-case basis to determine further remedial or corrective actions.

8. Providing Ongoing Subrecipient Training and Education. Training will be provided at least once per year. Examples of upcoming topics include new Title VI program requirements; revised ADA program requirements; and new FAST Act requirements for Transit Asset Management Plans and State of Good Repair Programs. The MDOT MTA OLTS will provide periodic monitoring of subrecipients compliance with new program requirements.

g) Construction/Renovation of Facilities

The MDOT MTA OLTS assists, reviews, and approves local projects during all phases of construction or renovation. Technical assistance is available for local recipients in the development and evaluation stage, for environmental reviews and compliance, for design and engineering, and during construction. An in-house team of appropriate experts is compiled to work with the local project manager and the local contractors. Projects that require environmental review/guidance will be administered through the MTA Department of Environmental Planning. MTA will work with subrecipients to ensure full compliance with FTA's environmental impact regulation (49 CFR part 622, referencing 49 CFR part 771).

N. OTHER PROVISIONS

To ensure compliance with other federal requirements, subrecipients of Section 5310 funds are required to sign Federal Certifications and Assurances for FTA Assistance Programs as part of the annual application, and these are reviewed as part of the overall application review process. For monitoring compliance by subrecipients, MDOT MTA OLTS performs a site review once during the lifetime of the project for each grant recipient.

A grant applicant applying for assistance under any FTA grant program must submit certifications and assurances that are applicable to the grant applicant's grant request during the fiscal year. FTA's annual Certifications and Assurances include basic program requirements for the 5310 program. It is MDOT MTA OLTS's responsibility to competitively select projects and certify that they are derived from a coordinated plan and that the local applicant's authorized representative has signed the affirmation page binding the applicant's compliance (located in the Assurance Package).

The Certifications and Assurances are released annually by FTA and may slightly differ year to year. Generally, Category I applies to all Applicants, Category II applies to all applications exceeding $100,000, and Categories III and on apply to and are required for some, but not all, applicants and projects. FTA and the applicant understand and agree that not every provision of these certifications and assurances will apply to every applicant or every project for which FTA provides federal financial assistance through a Grant Agreement or Cooperative Agreement. The type of project and the section of the statute authorizing federal financial assistance for the project will determine which provisions apply.

Some of the particular Federal requirements are addressed by MDOT MTA OLTS performing the vehicle procurements for these programs, thus the state procurement will deal with Buy America, pre- and post-delivery reviews, etc. Drug and alcohol testing is also addressed by having subrecipients and their contractors attend MDOT MTA OLTS training in FTA Drug and Alcohol policies and testing requirements, and through Drug and Alcohol site reviews. In general, MDOT MTA OLTS does not utilize these programs for the development of facilities, so many of the environmental requirements associated with facilities are moot.

Applicable Provisions

Several laws and administrative requirements apply in common to all federal grant programs. Compliance features for some of these requirements have been further defined by the FTA; inclusive of several unique provisions applicable to all FTA grant assistance programs, which are detailed below.

Public Hearing Requirements

The public hearing requirement in 49 U.S.C. 5323(b) for capital projects was amended by SAFETEA–LU. The law now associates more clearly the public involvement and hearing requirements for capital projects with the environmental review required by the National Environmental Policy Act (NEPA) and its implementing regulations. It also broadens the requirement to apply to all capital projects (as defined in 49 U.S.C. 5302). Now, the grant applicant must provide an adequate opportunity for public review and comment on a capital project, and, after providing notice, must hold a public hearing on the project if the project affects significant economic, social, or environmental interests. These requirements will be satisfied through compliance with the NEPA requirements for a public scoping process, public review and comment on NEPA documents, and a public hearing on every draft environmental impact statement (EIS). FTA will also require a public hearing on environmental assessments (EAs) that have a high probability of being elevated to EISs, ensuring that the applicant has complied with the public hearing requirement to include in the environmental record for the project. Pursuant to 49 U.S.C. 5323(b), any application for a project that will "substantially affect a community or the public transportation service of a community" shall include a certification to the effect that the applicant has:

a) Provided an adequate opportunity for public review and comment on the project;

b) After providing notice, held a public hearing on the project if the project affects significant economic, social, or environmental interests;

c) Considered the economic, social, and environmental effects of the project; and

d) Found that the project is consistent with official plans for developing the community.

Section 5323(b)(2) further states, "Notice of hearings under this subsection shall include a concise description of the proposed project; and shall be published in a newspaper of general circulation in the geographic area the project will serve."

Section 5323(b) must be read in concert with Section 5324(b) which states that FTA must review the public comments and hearing transcript to ascertain that an adequate opportunity to present views was given to all parties having a significant economic, social, or environmental interest in the project, and that FTA must make a written finding to this effect.

The public hearing requirements of 49 U.S.C. 5323(b) are separate and apart from the requirements for public participation in statewide and metropolitan planning. All capital projects financially supported by FTA are subject to statewide transportation planning requirements and, in metropolitan areas, to metropolitan planning requirements. FTA and FHWA have codified procedures for compliance with the statewide and metropolitan planning statutory mandates – including the mandates for public participation in the development of long-range plans and Transportation Improvement Programs – in the two agencies' joint planning regulations. (See 23 CFR part 450 and 49 CFR part 613).

Transit Employee Protection – Title 49 U.S.C. 5333(b)

Title 49 U.S.C. 5333(b) requires that the interests of employees affected by assistance under most FTA programs shall be protected under arrangements the Secretary of Labor concludes are fair and equitable.

When Federal funds are used to acquire, improve, or operate a transit system, Federal law requires arrangements to protect the rights of affected transit employees. These arrangements must be approved by the Department of Labor (DOL) before the Department of Transportation's FTA can release funds to grantees. The terms and conditions of the protective arrangements are included in the grantee's contract with FTA.

The requirement to protect transit employees is contained in Section 5333(b) of Title 49 U.S. Code (formerly Section 13(c) of the Federal Transit Act). Section 5333(b) specifies that the arrangements must provide for the preservation of rights and benefits of employees under existing collective bargaining agreements, continuation of collective bargaining rights, protection of individual employees

against a worsening of their positions in relation to their employment, assurances of employment to employees of acquired transit systems, priority of reemployment, and paid training or retraining programs.

DOL Procedural Guidelines (Federal Register 29 CFR Part 215), encourage the development of employee protections through local negotiations, but establish time frames for certification to expedite the process and make it more predictable, while assuring that the required protections are in place. Under the guidelines, a DOL certification permitting the release of transit funds will occur within 60 days from the date the DOL begins processing a grant application. This may be a final certification or an interim certification.

Pursuant to the Guidelines, DOL refers for review the grant application and the proposed terms and conditions to unions representing transit employees in the service area of the project and to the applicant and/or subrecipient. No referral is made if the application falls under one of the following exceptions: 1) employees in the service area are not represented by a union; 2) the grant is for routine replacement items; 3) the grant is for a Job Access project serving populations less than 200,000.

When a grant application is referred to the parties, DOL recommends the terms and conditions to serve as the basis for certification. The parties have 15 days to inform DOL of any objections to the recommended terms including reasons for such objections. If no objections are registered, or if objections are found not sufficient, DOL certifies the project on the basis of the recommended terms.

If DOL determines that the objections are sufficient, the parties are directed to negotiate for up to 30 days, limited to issues defined by DOL. If the parties are unable to reach agreement within 30 days, DOL will review the final proposals and issue an interim certification permitting FTA to release funds, provided that no action is taken relating to the issues in dispute that would irreparably harm employees.

Following the interim certification, the parties may continue negotiations. If they are unable to reach agreement, DOL sets the terms for Final Certification within 60 days. DOL may request briefs on the issues in dispute before issuing the final certification.

Employees who believe they have been adversely affected as a result of Federal transit assistance may file claims under the procedures set forth in the protective arrangements certified by DOL.

Restrictions on Lobbying

FTA recipients are prohibited from using federal financial assistance to influence any Member of Congress or an officer or employee of any agency in the connection with the making of any federal contract, grant, or cooperative agreement. MDOT MTA OLTS and Section 5311 recipients of grants exceeding $100,000 must sign a certification so stating and must disclose the expenditure of non-federal funds for such purposes (49 CFR part 20). Other Federal Laws also govern lobbying activities. For example, federal funds may not be used for lobbying Congressional representatives or senators indirectly, such as by contributing to a lobbying organization or funding a grass-roots campaign to influence legislation (31 U.S.C § 1352). General advocacy for transit and providing information to legislators about the services a recipient provides in the community are not prohibited, nor is using non-federal funds for lobbying, so long as the required disclosures are made.

Currently, subrecipients certify to MDOT through the grant agreements and the annual certifications and assurances. Specific contracts, grants or cooperative agreements are actions covered by the restrictions on lobbying. Activities such as submitting grant applications, status inquiries, and professional and technical services are not lobbying and do not need to be disclosed. Efforts to influence Federal officials about specific grants and contracts or to ask Congressional representatives for support of a particular application or bid must be disclosed. Also, lobbying restrictions do not apply to activities that might influence policy issues.

Subrecipient responsibilities:

- Sign a certification of compliance pertaining to lobbying activities.
- Where third party contractors are involved, subrecipients must obtain a signed certification of compliance from the contractor.
- If non-federal funds have been used to support lobbying activities in connection with a grant from MTA, and the subrecipient receives federal grants exceeding $100,000, fill out Standard Form-LLL and submit it to MTA.

- If contractors received more than $100,000 in federal funds and used non-federal funds to support lobbying, subrecipients must obtain the completed Standard Form-LLL from the contractor and submit it to MTA.

Drug and Alcohol Testing

Recipients or subrecipients that receive Section 5310 assistance are not subject to FTA's Drug and Alcohol testing rules, but must comply with the Federal Motor Carrier Safety Administration (FMCSA) rule for employees who hold Commercial Driver's Licenses (CDLs) (49 CFR part 382). . An FTA compliant testing program, as required by the receipt of FTA operating or capital funding (5307, 5309, 5311), can be used for Section 5310 employees; there is no need to have two testing programs. Employees of a subrecipient of Section 5310, funds from a designated recipient of another FTA program (such as 5307 or 5311) should also be included in the designated recipient's testing program.

To assure compliance with the drug and alcohol testing requirements, FTA has promulgated a regulation titled, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations" (49 CFR part 655). The regulation applies to recipients of funds identified above. The regulation requires that FTA recipients follow the drug and alcohol testing procedures found in applicable FTA (49 CFR part 655) and DOT (49 CFR part 40) regulations.

FTA's regulation applies to "employers," and the term employer is defined as "a recipient [of FTA funding] or other entity that provides public transportation service or which performs a safety-sensitive function for such recipient or other entity." The term includes subrecipients, operators, and contractors. The direct recipient of FTA funding, however, remains responsible to FTA both for carrying out the regulations and for ensuring that any person or organization performing a safety-sensitive function on its behalf is in compliance with FTA regulations. Applicability to capital funding is limited to revenue operations; it does not apply to construction phases of funded projects.

FTA's regulation requires testing of employees who perform a safety-sensitive function, which is defined in 49 CFR 655.4. The regulation requires the following six types of testing: pre-employment for drugs (including transfer from a non-safety-sensitive position to a safety-sensitive position); reasonable suspicion; random; post-accident; return-to-duty; and follow-up.

FTA's regulation requires each employer to establish and implement a substance abuse prevention program consisting primarily of a testing program but with elements requiring training, educating, and evaluating safety-sensitive employees. The regulation requires the development of a detailed policy statement that must be distributed to all safety-sensitive employees and employee organizations. In addition, 49 CFR part 655 Subpart D establishes alcohol concentration levels and prohibited behavior, and employers are directed to take specific action on the basis of the level of alcohol concentration. Technical assistance materials and training information to help grantees implement the rules are available through the FTA Office of Safety and Security, FTA Headquarters.

Drug-Free Workplace

In accordance with the Drug-Free Workplace Act of 1988 (41 U.S.C. 701 et seq.), and 49 CFR part 32, each recipient is required to maintain a drug-free workplace for all employees and to have an anti-drug policy and awareness program. The grant applicant must agree that it will provide a drug-free workplace and comply with all requirements of 49 CFR part 32.

The recipient is required to provide a written Drug-Free Workplace policy statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the workplace and stating specific actions that will be taken for violations.

The ongoing drug-free awareness program must inform employees about the dangers of drug abuse; about any available drug counseling, rehabilitation, and employee assistance programs; about penalties that may be imposed; and that employees are to be aware that the recipient operates a drug-free workplace.

An employee of an FTA recipient is required to report in writing any conviction for a violation of a criminal drug statute occurring in the workplace, and the recipient/employer is required to provide written notice to FTA within ten days of having received the notice. Within 30 days of receiving the notice of a conviction, the recipient/employer must have taken appropriate action against the employee or have required participation in a drug abuse assistance or rehabilitation program.

Technical assistance materials and training information to help grantees implement the Drug-Free Workplace and Drug and Alcohol Testing rules are available through the FTA Office of Safety and Security, FTA Headquarters.

ATTACHMENT A
APPLICATION FORMS

SECTION 5310 – ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES PROGRAM

MARYLAND STATE MANAGEMENT PLAN

Maryland Department of Transportation
Maryland Transit Administration

Section 5311

Updated July 2025

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I. INTRODUCTION

A. Background

Section 5311 – Formula Grants for Rural Areas provides federal funding to support public transportation in rural areas (less than 50,000 in population). Section 5311 of the Federal Transit Act (USC 49) authorizes the US Secretary of Transportation to apportion funds to each state for public transportation projects in rural areas. In Maryland, The Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) has been designated by the Governor to receive these funds and administer the program.

The Federal Transit Administration's (FTA's) most recent authorizing legislation is the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law (BIL), signed into law in November 2021 and effective FY2021 through FY2026, becoming the current law governing federal surface transportation programs and making major investments in infrastructure, including roads, bridges, transit, and broadband. This legislation continues to authorize rural public transportation funding, which was initially created following passage of the Federal Public Transportation Act of 1978 (Pub L. 95–599) as the Section 18 program under the Urban Mass Transportation Act (49 U.S.C. App. 1601 et seq.). The program has evolved through subsequent reauthorizations, including the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) (Pub. L. 102–240), the Transportation Equity Act for the 21st Century (TEA–21) (Pub L. 105–178), the Safe, Affordable, Flexible, Efficient, Transportation Act a Legacy for Users (SAFETEA–LU), the Moving Ahead for Progress in the 21st Century Act (MAP-21) (Pub L. 112-141), and the Fixing America's Surface Transportation (FAST) Act, Pub. L. 114-94 . In 1994, legislation codified the Federal transit program, changing the citation for the rural transit program from 49 U.S.C. app. 18, to 49 U.S.C. 5311, thus renaming the Section 18 program to Section 5311.

Congress established the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On December 4, 2015, President Obama signed the Fixing America's Surface Transportation (FAST) Act, reauthorizing surface transportation programs through the Fiscal Year 2020.

Congress established the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58, also known as the "Bipartisan Infrastructure Law") into law. The legislation reauthorizes surface transportation programs for FY 2022-2026 and provides advance appropriations for certain programs. The Bipartisan Infrastructure Law authorizes up to $108 billion to support federal public transportation programs, including $91 billion in guaranteed funding.

In addition to the authorization of surface transportation programs, Congress also authorized additional support for transit agencies during the COVID-19 public emergency:

> The Coronavirus Aid, Relief, and Economic Security (CARES) Act provides $25 billion to transit agencies to help to prevent, prepare for and respond to the COVID-19 pandemic.
>
> On December 27, 2020, the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA), which includes $900 billion in supplemental appropriations for COVID-19 relief, $14 billion of which will be allocated to support the transit industry during the COVID-19 public health emergency
>
> The American Rescue Plan Act of 2021 (ARP), which President Biden signed on March 11, 2021, includes $30.5 billion in federal funding to support the nation's public transportation systems as they continue to respond to the COVID-19 pandemic and support the President's call to vaccinate the U.S. population.

This State Management Plan (SMP) documents how the MDOT MTA administers the Section 5311 program in Maryland. It reflects the program requirements and characteristics under the IIJA Act, based on the legislation and currently available guidance from FTA, including FTA Circular 9040.1H, "Formula Grants for Rural Areas: Program Guidance and Application Instructions," effective December 12, 2024.

B. Goals and Objectives

The national goals of the Section 5311 program are:

- enhancing access in rural areas to health care, shopping, education, employment, public services, and recreation;
- assisting in the maintenance, development, improvement, and use of public transportation systems in rural areas;
- encouraging and facilitating the most efficient use of all transportation funds used to provide passenger transportation in rural areas through the coordination of programs and services;
- providing financial assistance to help carry out national goals related to mobility for all, including seniors, individuals with disabilities, and low-income individuals;
- increasing availability of transportation options through investments in intercity bus services;
- assisting in the development and support of intercity bus transportation;
- encouraging mobility management, employment-related transportation alternatives, joint development practices, and transit-oriented development; and
- providing for the participation of private transportation providers in rural public transportation.

C. Roles and Responsibilities

The MDOT MTA is the agency designated by the Governor to administer the Section 5311 Program. Specifically, it is the responsibility of MDOT MTA's Office of Local Transit Support (MTA/OLTS) to carry out the effective implementation of the program. MTA/OLTS staff provides technical and financial assistance to the Locally Operated Transit Systems (LOTS) serving all of Maryland's counties plus several towns and cities. MTA/OLTS staff is responsible for intergovernmental relations with the LOTS, planning, capital programming, training, regulation, and policy compliance, financial management and monitoring, and public relations on behalf of MDOT MTA in the local communities. The MDOT MTA is responsible for the data collection and compilation from each Section 5311 subrecipient in the State serving the general public. MTA/OLTS leads efforts to coordinate the funding and delivery of specialized transportation services at the State and local level.

While this State Management Plan addresses the FTA requirement to document Section 5311 program management in Maryland, due to the myriad of responsibilities associated with the Section 5311 Program, the MTA/OLTS provides additional comprehensive guidance to its staff

through standard operating procedures, and to its subrecipients through a Locally Operated Transit Systems (LOTS) Manual as well as the annual grant application package.

The MTA/OLTS coordinates with several other offices within MDOT MTA that have roles in program implementation. Specific program functions that are shared with other offices: the Office of Planning, the Office of Finance, the Office of Procurement, the Equal Opportunity Compliance Program, the Office of Engineering, Office of Real Estate, and the Office of Human Resources.

- The Office of Planning (Capital Programming), the Office of Finance, and MTA/OLTS are jointly responsible for the financial elements of grants management - Administration of FTA grant funds under the Section 5311 Program. In general, MTA/OLTS is responsible for most of the administrative functions required for MDOT MTA to manage the subgrants with the local subrecipients (including the public transportation providers, private non-profit agencies, and local governments), while the Capital Programming Division is primarily responsible for grant management activities between MDOT MTA and FTA (including the administration of all grants for MTA-operated or contracted services). Capital Programming staff tracks the reimbursement requests against the estimated milestone/timeline information provided by the subrecipients in their annual grant applications, sign letters attesting to the availability of funds for State procurements of Section 5311 Program funded vehicles, process Section 5311 Program-funded payments once MTA/OLTS Regional Planners approve an invoice or request for reimbursement, reconcile each grant by line item on a quarterly basis, prepare quarterly Milestone Progress Reports (MPRs). The Office of Finance is responsible for Financial Status Reports (FSRs) for each Federal grant, and submits these reports to FTA. They track the financial payments through the State's and Federal government's systems.

- The Equal Opportunity Compliance Program (EOCP) is responsible for civil rights program compliance – MDOT MTA's EOCP reviews subrecipient Title VI, DBE, and EEO programs for compliance with Federal and State requirements, and submits these documents to FTA on behalf of those subrecipients meeting Federal thresholds for FTA program submissions. The EOCP also submits

Title VI, DBE, and EEO programs and reports required for the State as the grantee.

- MDOT is responsible for public outreach on the Program of Projects (POP) - Every fall, the Maryland Secretary of Transportation and MDOT representatives physically visit each County and Baltimore City to distribute and present Maryland's Draft Consolidated Transportation Plan (CTP) in public meetings, a process known as the MDOT/CTP Tours. The CTP is an annual plan that also serves as Maryland's statewide POP for FTA funding. During the tours, members of the public provide comments on the plan and program, as well as input on local priorities. MTA/OLTS staff play a key role in supporting the tours, including documentation of and response to public comments.

- The Programming Division, MDOT, and the OLTS work together in the development of and amendments to the Statewide Transportation Improvement Program (STIP) - Maryland's STIP is the collection of the CTP along with the regional Transportation Improvement Programs (TIPs) from each metropolitan planning organization (MPO).

- The Office of Procurement is responsible for procuring small buses and other large quantity items granted to subrecipients on a statewide basis.

- The Office of Planning's Environmental Division and Project Development Division provide technical assistance in planning and environmental work related to large scale capital facilities projects.

- The Office of Engineering provides technical assistance and assists with construction oversight on an as needed basis for large scale construction projects being undertaken by subrecipients.

- The Office of Real Estate provides assistance on an as needed basis with property acquisition and right-of-way for facility purchases and bus stop projects being undertaken by subrecipients.

- The Office of Human Resources is responsible for oversight of subrecipients' drug and alcohol programs, reporting, and compliance.

D. Coordination

State Coordinating Committee

MDOT MTA participates on and has chaired the State Coordinating Committee for Human Services Transportation (SCCHST), which includes representation from the State's Departments of: Aging; Disabilities, Education; Health & Mental Hygiene; Housing & Community Development; Human Resources; Labor, Licensing, & Regulation; Planning; Transportation; Veterans Affairs; as well as the Governor's Office of the Deaf & Hard of Hearing, and the Maryland Developmental Disabilities Council.

The Governor created the SCCHST in October 1997 (Executive Order 01.01.1997.06). It was reconstituted in September 2006 and again in April 2010 (Executive Order 01.01.2006.09; Executive Order 01.01.2010.10). In October of 2023, the SCCHST was codified into law through Senate Bill 511 - Health and Human Services Transportation Improvement Act of 2023. By September 1 each year, the committee must report on its activities to the Governor and the General Assembly and among other specific tasks is to develop a five-year health and human services transportation plan.

The SCCHST examines and plans for the transportation needs of elderly persons, people with disabilities, and those who need affordable, accessible transportation to get to work, job training, and education programs. To ensure Marylanders continued access to education, health care, jobs, senior citizen activities, and training, the SCCHST prepared and works with MTA/OLTS to update a five-year plan for human services transportation. The SCCHST also coordinates the efforts and resources of Federal, State and local agencies; serves as a clearinghouse for transportation issues; and investigates the need for standards for vehicles and drivers. In addition, the SCCHST participates in planning for the allocation of human services transportation resources for emergency evacuations.

Although the SCCHST does not have a direct role in managing the Section 5311 program, it has initiated and guided projects that have resulted in technical assistance to Section 5311 subrecipients (such as the Maryland Coordination Manual).

Local and Regional Coordination Planning

To respond to the coordinated planning requirements established by SAFETEA-LU for the Section 5310 program, the former Job Access and Reverse Commute program, and the former New Freedom program, MTA/OLTS led the development of a statewide and five regional Coordinated Public Transit-Human Services Transportation Plans. In partnership with regional bodies and other key stakeholders, MTA/OLTS supported the development of the Coordinated Transportation Plans through a statewide process that included regional forums, regional planning committees, public meetings, and a project website. Each of these activities incorporated representatives of human service agencies, transportation providers, user groups, and MTA/OLTS. The locally developed Coordinated Public Transit Human Services Transportation

Plans served as the basis for selection of future projects to be funded through the Section 5310, JARC, and New Freedom Programs (of which the latter two were eliminated with the passage of MAP-21). These plans identified the transportation needs of individuals with disabilities, older adults, and people with low incomes, strategies for meeting these local needs, and potential projects that correspond to each strategy. As part of the development of these plans, when public transit systems are funded under Section 5311 and Section 5307, the MTA/OLTS will coordinate participation in the local planning process for public transit human service transportation in those areas applying for funds under Section 5310.

Each of five regions in the State established a Regional Coordinated Planning Committee to provide an ongoing format to discuss any local transportation needs, especially those of older adults, people with disabilities, and people with lower incomes. They are also charged with updating the Coordinated Transportation Plans as needed, but at a minimum of every three years. The state-level Maryland Coordinated Public Transit-Human Services Transportation Plan (the State Plan) is updated every four years by the MTA/OLTS working in conjunction with the SCCHST and a State Coordinated Planning Committee that includes representatives from each of the five regional planning efforts.

The Annual Transportation Plan (ATP), which serves as the subrecipient application for Section 5311 as well as other Federal and State funding for public transportation funding, encourages coordination of programs and services. Applicants must submit substantial narrative descriptions on how funds will be used in a coordinated manner. The ATP itself is

a consolidated subrecipient application for funding under FTA Sections 5311, 5307 (Urbanized Area Formula Funding for small urban areas), 5339 (Bus and Bus Facilities), and 5303/5304/5305 (Planning and technical assistance projects), as well as several State funding programs.

Consistent with the Federal requirement for maximum feasible coordination of public transportation service assisted under Section 5311 with transportation assisted by other Federal sources, MTA/OLTS requires that Federal and State public transportation funds be used in transportation projects that encourage the use of funds through the coordination of programs and services. The ATP includes information on other transportation services operated by the Section 5311 subrecipient and related funding and equipment, including services funded by human service programs (e.g. Office on Aging, Developmental Disabilities, Medical Assistance, etc.). In addition, each local applicant is required to examine opportunities for coordination at the project level and must contact existing area transportation providers as a part of development of the ATP.

MTA/OLTS also supports coordination at the local and regional level through technical assistance and strategic planning projects.

II. GENERAL INFORMATION

A. Eligible Applicants and Subrecipients

MDOT MTA is the direct applicant for Section 5311 funds in Maryland

Eligible subrecipient applicants for Section 5311 funds in Maryland include counties, municipalities and public agencies, as well as non-profits, public corporations, boards, and commissions established under State law. When an entity other than a county applies for Section 5311 funds for the first time, the application must be submitted by the County in which the entity is located. Section 5311-funded programs must provide transportation for the general public in rural areas.

For the Section 5311(f) Intercity Bus (ICB) program, eligible applicants include private intercity bus providers, private non-profit agencies, local public transit providers, and public bodies.

Other private for-profit operators, including taxicab companies, may participate in Section 5311 projects through service contracts with eligible subrecipients. Such contracts are subject to Federal and State procurement requirements.

Any applicant for Section 5311 funding must be authorized by their governing body to apply for Section 5311 funds, and, in the case of private entities, must hold the appropriate federal and state operating authority.

The subrecipients may be engaged in providing transportation to specific population groups, as well as to the general public, and may also operate more than one mode of transportation. Subrecipients may also make arrangements with one or several subrecipients. However, each applicant's program, regardless of the number of subrecipients, must provide public transportation. All arrangements with subrecipients of Section 5311 funds other than the eligible applicant must be in written form.

In some cases, Maryland may choose to grant Section 5311 assistance to a subrecipient through an intermediary subrecipient. For example, for public policy reasons, Maryland might pass funds to a non-profit organization through a local public body. The arrangement between the first tier and second tier subrecipient is not a third-party contract if the ultimate subrecipient would otherwise be eligible under Section 5311 to receive funds directly from the State and the ultimate subrecipient intends to use those funds to pursue its own rural area transit project.

There are currently no Federally Recognized Indian Tribes in Maryland, and thus they are not listed among eligible applicants.

B. Eligible Services and Service Area

Public Transportation Projects

Section 5311 funds are available for public transportation projects in rural areas. Public transportation in Maryland is transportation that is either publicly or privately owned, which provides service on a regular and continuing basis. Charter, sightseeing, or exclusive school bus transportation are not considered public transportation. Services may be designed to maximize usage by transportation disadvantaged persons, provided that the general public is afforded an equal opportunity to utilize

the transportation services.

Maryland's rural areas are those areas outside the State's urbanized area, as a result of the 2020 Census conducted by the U.S. Census Bureau. Maryland's rural areas are those areas except the urbanized areas of Aberdeen-Bel Air South-Bel Air North; Baltimore; Cumberland; Frederick; Hagerstown; Lexington Park-California-Chesapeake Ranch Estates; Philadelphia, PA; Salisbury; Waldorf; Washington, D.C.; and Westminster-Eldersburg. Since a goal of the Section 5311 program is to enhance access of people in rural areas to activities, projects may include the transportation of rural area residents to and from urbanized areas.

C. Eligible Assistance Categories

State Administration

Funding for State program administration is applied for on an "as needed" basis. It is the goal of the State to keep these costs below the maximum permitted by FTA (currently 10%) and reserve the remaining funds for assistance to local projects.

Subrecipient Operating Assistance

Operating assistance is available for financing the operation of a transportation service, including administrative expenses, and augments local funds by financing net operating deficits. Net operating deficits are those expenses remaining after operating revenues are subtracted from the total operating cost.

The financing of Section 5311 operating assistance is:

Federal Share: Up to 50 percent of the net operating deficit.

State Share: Up to 50 percent of the net operating deficit.

Local Share: A minimum of 25 percent of the net operating deficit. The local share can be provided in cash or in-kind services. In-kind services would include any eligible operating expense incurred during the project term, such as fuel, rent, utilities, insurance, record keeping, etc.

Eligible Operating Expenses

Eligible operating expenses are those costs directly related to the transportation system's operation. These costs include, but are not limited to out of pocket expenses such as fuel; oil; insurance; replacement tires; replacement parts which do not meet the criteria for capital items; maintenance and repairs; salaries and fringe benefits of drivers, mechanics, and dispatchers; licenses; the portion of staff time spent on transportation service; and the value of costs incurred by the transportation program that are paid by non-Department of Transportation (DOT) funding sources.

Eligible operating expenses are itemized in both the ATP grant application budget and the monthly Financial Statement, which is completed and submitted quarterly by all Section 5311 applicants in support of their request for reimbursement (See Attachment 1 which is Form B2 in ATP).

Project Administrative Expenses

Project administrative costs directly associated with the operating of a public transportation system, such as insurance, are considered a part of the operating costs and are eligible for operating assistance.

Meal Delivery

Meal delivery services for homebound persons are allowed by transit service providers receiving assistance under Section 5311 as long as the meal delivery services do not conflict with the provision of transit services or result in a reduction of service to transit passengers. Section 5311 will not pay the operating costs solely for meal delivery services nor purchase vehicles to be used solely for meal delivery.

Ineligible Operating Expenses

The following transportation-related operating expenses are ineligible for Section 5311 assistance:

- Indirect transportation-related functions or activities of local public

governing bodies performed as a normal or direct aspect of public administration (e.g., expenses of a city council in considering transit matters);
- Charitable contributions and donations;
- Entertainment expenses;
- Fines and penalties;
- Bad debts;
- Provision of charter services;
- Lobbying activities; Expenses paid by other funding sources;
- Interest expenses on loans; and
- Depreciation accrued on facilities or equipment purchased with Federal and/or State funds.

Operating Revenues

Operating revenues include: revenues from fares or donations, advertising revenue, revenue derived from service contracts, and any other miscellaneous revenue attributable to program operations.

Capital Assistance

Capital assistance is available for financing capital equipment needed for an efficient, effective, and coordinated transportation system.

The financing of Section 5311 capital assistance is:

Federal: Up to 80 percent of the project cost

State Share: Up to 10 percent of the project cost

Local Share: A minimum of 10 percent of the project cost. The local share must be provided in cash, except for transit facility or bus shelter projects where the value of any land associated with project may be included as cash equivalent "soft match."

Eligible Capital Expenses

Eligible capital projects include, but are not limited to:

- Buses, maintenance, service, and/or paratransit vehicles (including ADA vehicles),
- Radios or other communications equipment,
- Bus stop signs, benches, or shelters,
- Wheelchair lifts and related vehicle modifications,
- Vehicle rehabilitation where candidate vehicles meet the extended useful life and rehabilitation cost limits established by the MTA/OLTS,
- Construction or rehabilitation of transit facilities including design, engineering, and land acquisition,
- Operational support such as computer hardware and software to be used for the transportation program,
- Spare parts, maintenance and other miscellaneous equipment with a unit cost over $1,000 and a useful life of more than one (1) year, and/or,
- Vehicle preventive maintenance programs.

While the above list represents typical Section 5311 capital projects funded in Maryland, MTA/OLTS follows Federal Section 5311 program guidelines regarding eligible capital expenditures, including the list of possible projects contained in the most current FTA Circular C 9040 (currently C 9040.1H).

D. Local Share and Local Funding Requirements

The local share includes all local funds contributed to meet project costs. The local share may be provided for in cash (except for 5311(f)) for operating and capital assistance, except for facility or bus shelter projects, and project administration expenses.

Cash may include local appropriations or cash derived from other sources. Cash equivalent or soft match is the contribution or donation of goods, services, or labor directly related to the functions of the project and is eligible only if the value of the contribution or donation is formally documented and supported by the local subrecipient's records. The value for soft match contributions must be reasonable and should not exceed the cost to the donor or the current market price, whichever is less, at the time they are charged to the project.

In-kind services used as local matching funds for operating expenses can only be used as a match in direct proportion to the level of service allocated

to the program. The following types of contributions may be provided as in-kind local match:

- ***Use of Space*** - The value of contributed space should not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

- ***Value of other non-expendable personal property*** - The value of non-expendable personal property should not exceed the fair value of property of the same age and condition at the time of donation.

- ***Value of other charges*** - Other necessary charges incurred specifically for an indirect benefit to the grant program on behalf of the provider may be accepted as matching share provided that they are adequately supported and permissible under the law. Such charges must be reasonable and properly justifiable.

All local contributions, both cash and cash equivalent, are accepted as part of the local subrecipient's matching share when such contributions meet all of the following criteria:

- Are verifiable from the provider's records;
- Are not included as contributions for any other Federally assisted program;
- Are necessary and reasonable for proper and efficient accomplishment of project objectives;
- Are types of charges that are allowable;
- Are not paid by the Federal government under another assistance agreement unless authorized under the other subject;
- Are provided for in the approved budget when required by the funding agency; and
- The basis for determining charges for personnel services, material, equipment, building, and land must be documented.

Contract Revenues as Local Match

Income from contracts to provide human service transportation may be used either to reduce net operating project cost (i.e., treated as fares) or to provide operating local match, even though the original source of such funds may have been another Federal program.

It is the MTA/OLTS's policy that human service contract revenue being used as local match must be verified at the time grant agreements are signed. Other than other state agency intrafund transfers, the subrecipient must provide MTA/OLTS with a copy of their written contract or agreement prior to signing the MTA grant agreement. In addition, the subrecipient must have the cash payment for contract services in hand before submitting quarterly or monthly reimbursement request to MTA/OLTS.

Further, operating funds from human service agency contracts to transport individuals, which are paid directly to the transit provider (and not included as farebox revenue), are not considered local match in the year in which the revenues were earned (but may be used as contract revenue to offset the net operating deficit).

State Funding as Local Match

In most years, Maryland contributes State funding toward the rural local match requirement, thus reducing the local match required from the subrecipients.

III. PROJECT SELECTION CRITERIA AND METHOD OF DISTRIBUTION OF FUNDS

A. Operating Assistance

Background

In the early years of Maryland's Section 5311 program, Section 5311 operating assistance was allocated on a discretionary basis to every eligible rural jurisdiction requesting funds based upon a transit system's need and availability of funds. However, as the number of Section 5311 applicants increased, a method to control and predict the level of expenditures while providing equitable, adequate, and stable funding was needed. Therefore, in State Fiscal Year 1989 (beginning July 1, 1988), an operating assistance allocation method for existing Section 5311 operating assistance applicants was instituted.

The 1989 allocation method was tied to the Consumer Price Index (CPI) whereby a subsequent year's net operating deficit was indexed to the estimated increase of the CPI. Seventy-five percent of this indexed net operating deficit was provided through a combination of Federal and State funds, while the local applicant was responsible for a minimum of 25 percent of the operating deficit. The amount of Federal and State funds allocated to operating assistance for a particular year was dependent upon the amount of available Federal funds.

When the 1989 allocation method was instituted, however, the State was not able to fund any increase in operating assistance to Section 5311 subrecipients. In fact, funds were reduced reflecting the shortage of revenue in the Maryland DOT's Transportation Trust Fund.

In 1995, the MTA/OLTS developed a formula to allocate the Section 5311 funds throughout Maryland. The formula was based on rural population and State and Federal funding levels. This allowed the MTA/OLTS to fund more systems with limited resources.

Current Allocation Methodology

The current Section 5311 funding suballocation methodology uses four factors to determine the annual allotment to each LOTS. The factors are

as follows:

- Number of Trips 30%
- Revenue Miles 30%
- Revenue Hours 30%
- Population in Poverty 10%

Fiscal year allocations are subject to budget approval by the Maryland General Assembly and the Federal Section 5311 allocation for Maryland in that year.

Funding for new systems must be preceded by the completion of a Transportation Development Plan (TDP) delineating the need for and feasibility of the new project, while service expansions must be justified with formal documentation showing the need for the expanded service. Section 5304 funds may be available to local jurisdictions to complete these studies.

B. Capital Assistance

Section 5311 capital projects are funded on a discretionary basis according to necessity; therefore, each local applicant must provide a justification for their requested capital projects. The priorities for funding capital assistance are: 1) replacement vehicles, which must meet the service life guidelines that are included in Chapter XIII - State Program Management of this plan; 2) vehicles required for ADA compliance; 3) preventive maintenance, 4) other transit capital equipment necessary for the operation of rural transit services, such as parts, radios, or miscellaneous maintenance equipment; 5) vehicles for expanded service; and 6) facilities. Facility projects must be preceded by the completion of a Feasibility Study or Needs Analysis which includes the justification of the need and enough preliminary engineering to accurately estimate the cost for such a capital investment.

Capital project funding is awarded and administered in accordance with FTA Circular 4220.1G, and the MTA/OLTS's or the local jurisdiction's competitive procurement procedures after they have gone through the ATP annual review process and have been recommended for the Annual Program of Projects. The ATP annual review process consists of a statewide review of capital needs. Projects are selected based on funding availability, safety, risks and demonstrated need.

All capital grant applicants must provide an adequate opportunity for public review and comment on a capital project, and after providing notice, must hold a public hearing on the project if the project affects significant economic, social, or environmental interests.

Appalachian Development Public Transportation Assistance Program

Title 49 U.S.C. 5311(c)(2) authorizes the Appalachian Development Public Transportation Assistance Program (ADTAP), which allocates funds by statutory formula. This new program is funded with a takedown from the Section 5311 program to provide additional funding to states in the Appalachian region of the United States. FTA apportions the funds to designated states (which Maryland is one of) for purposes eligible under Section 5311; including capital, operating, planning, job access and reverse commute projects, and administrative costs. A service area must be located in the Appalachian region (Allegany, Garrett, and Washington counties) to be eligible for funds. The MTA has elected to use ADTAP program funds for capital projects, which also requires a 20 percent local match.

C. Title VI - Equity of Distribution of Benefits Across the State

The MTA/OLTS is required to evaluate and select projects without regard to race, color, or national origin; identify and assist providers, including those that are minority organizations or serve minority populations, in applying for assistance; and ensure that subrecipients provide service without regard to race, color, or national origin.

MTA/OLTS portion of MTA's Title VI Plan, including its planning efforts to ensure equitable distribution of funds as well as its procedures for monitoring subrecipient compliance, is summarized in Section VIII.A (Title VI) of this SMP. The detailed MTA/OLTS portion of MTA's Title VI Plan is attached as Appendix A.

IV. INTERCITY BUS TRANSPORTATION

Section 5311(f) of 49 U.S.C. requires each State to expend at least 15 percent of the annual Section 5311 apportionment for an intercity bus program, unless the Governor certifies "the intercity bus service needs of the State are being met adequately" after the mandatory consultation with affected intercity bus service providers.

A. Consultation Process

Maryland's consultation process:

- Identifies intercity bus providers in the State, websites of private intercity bus operators, and State regulatory agency listings;

- Informs intercity bus carriers of intent to certify and afford an opportunity to submit comments to identify unmet needs;

- Includes intercity providers' participation in the annual Transportation Association of Maryland (TAM) conference;

- Includes coordination of rural connections between small transit operations and intercity bus carriers/and or carriers individually as a service that acts as a feeder to the intercity bus service, and which makes meaningful connections with intercity bus service to more distance points;

- Provides an opportunity for intercity bus providers to submit proposals for funding as part of the annual distribution of funds;

- Informs intercity bus providers about the development of the Coordinated Public Transit Human Services Transportation Plans, requests their participation, and includes an assessment of the intercity bus needs in the plan;

- Notifies providers either through direct mail or advertises in various locations around the State of availability of funds for the current year's intercity bus program; and

- Includes intercity bus transportation in Statewide Long-Range Planning.

B. Funding Program Implementation

Beginning in State Fiscal Year 2011, following a statewide needs analysis and consultation process that identified unmet needs in intercity bus service, Maryland began to use a portion of its Section 5311 allocation to fund

intercity bus projects. A new statewide needs analysis is programed in the next five (5) year RFP for the Rural and Small Urban Transportation Planning Services solicitation.

The State uses a merit-based, competitive proposal selection process to ensure that the private operator is qualified, will provide eligible service, is able to comply with Federal and State requirements, and is the best, or only, provider available to offer service at a fair and reasonable cost. This process is through a stand-alone application separate from other Section 5311 funding applications.

The program is on a biennial cycle. Funding is available for operating and capital projects.

- Operating funding may be used for new routes as well as for existing routes that without federal subsidy are at risk of abandonment. Projects may serve as a rural feeder to existing intercity service or a longer distance route to meet a gap in existing intercity service. Up to 50% of the net operating cost is eligible for Federal S. 5311(f) operating funding. MTA/OLTS has established a 15% farebox recovery target for existing services. For new services, MTA/OLTS intends that projects will be reviewed in light of the following farebox recovery targets: 5% after 6 months of operations; 10% after 12 months of operations; and 15% after 18 months of operations. Services will be evaluated to determine if continued support is warranted. Services from the 24-month period that have proven successful will receive priority consideration for the next grant application.

- Capital funding is available for purchase of new rural intercity vehicles for use on routes or services that will receive Section 5311(f) operating assistance in Maryland; intermodal or public facility improvements that are directly related to the operation of intercity bus services; ADA accessibility improvements; intercity facility planning studies, feasibility studies and architectural engineering; retrofit of existing rural intercity vehicles for ADA accessibility; capitalized vehicle maintenance; passenger shelters; signage; technology for ticketing, vehicle monitoring/communication, or passenger information; and other related capital needs.

    - For vehicle projects, the vehicle must be ADA-accessible and be able to carry baggage. Vehicles funded under this program are

subject to compliance requirements to ensure appropriate usage, maintenance, and insurance.

- For facilities-related projects, priority is given to projects in non-urbanized areas. If no applications for station projects are proposed in a non-urbanized area, funding will be considered for similar projects in urbanized areas, but only in proportion to the amount of service or usage provided for intercity services connecting to non-urbanized areas. Only carrier-owned and controlled stations, or owned and controlled by a local public entity or public transportation provider are eligible. Unless MTA/OLTS approves a plan for ongoing control, publicly owned stations must be made available to all current or potential carriers on an equal basis.

Funds used for the local match must be non-federal sources. For operating projects, MTA/OLTS provides qualified applicants with the opportunity to use the FTA-permitted in-kind match program (unsubsidized scheduled service), provided that the private operator agrees in writing to the use of their unsubsidized costs as local match. The application must identify the unsubsidized segment to be used as local match, as well as miles and fully allocated costs.

The most recent application package for the Maryland's Section 5311 Intercity Bus program is attached as Appendix B.

V. ANNUAL PROGRAM OF PROJECTS DEVELOPMENT AND APPROVAL PROCESS

A. Subrecipient Application Process

The Section 5311 program is comprised of three basic steps: planning, programming, and implementation. The products of these steps are technical studies, annual transportation plans, and ultimately, public transportation service. Technical studies, which help local officials determine their transportation needs, are funded through Section 5304 technical assistance grants. The application process is described below.

Each Fall the program announcement and Annual Transportation Plan (ATP) package for the following fiscal year's funding are distributed to all

current Section 5311 subrecipients.

In Maryland, the application for the Section 5311 program is combined with other Federal and State public transit funding programs into one document known as the Annual Transportation Plan (ATP). The funding programs applied for through the ATP currently include:

- Section 5311 (excluding the Intercity Bus Program, which has a separate application process described in Section IV.B of this SMP);
- Section 5307 (Urbanized Area Formula Program) for small urbanized areas;
- Section 5339 (Bus and Bus Facilities)
- Sections 5303/5304/5305 (for subrecipient planning and technical assistance projects);
- State Americans with Disabilities Act (ADA) Program - The State of Maryland provides funds to transit systems that operate fixed routes to provide complementary paratransit service to persons with disabilities as required under the Federal ADA;
- State Large Urban Capital and Operating Assistance - Eligibility for these funds is limited to LOTS serving the Baltimore and Washington, DC metro areas; and
- Statewide Specialized Transportation Assistance Program (SSTAP) - The SSTAP provides State funds to local governments for general- purpose transportation of the elderly and persons with disabilities.

Each subrecipient's ATP describes the operation of the subsequent year's transportation program and includes all the Federally-mandated local assurances, as well as the documentation needed to assure the MTA/OLTS that all State and Federal requirements will be met. The current Annual Transportation Plan document is provided in Appendix C.

The entire cycle, from the initial announcement of allocations, is approximately as follows:

Program Announcement:	Fall
Application Deadline:	Winter
State Application Submission:	Early Spring
Federal Approval:	Summer

Once a Section 5311 Annual Transportation Plan has been approved by the MTA/OLTS and the Federal funds approved by FTA, an interagency grant agreement between the MDOT MTA and the subrecipient is executed. This agreement will contain all appropriate certifications and assurances and serve to notify the subrecipients of all FTA requirements. The MTA/OLTS will maintain files documenting the basis for all assurances it makes to the FTA. Each fiscal year, the MTA Office of Planning (Capital Programming) will electronically submit the appropriate certifications and assurances for all active grants that it expects FTA to make during that year.

The MTA/OLTS's review and approval process of Annual Transportation Plans includes an analysis of the transportation service plan and service performance, vehicle inventory and utilization plan, purchased vehicles, fixed asset inventory, vehicle replacement and refurbishment plans, vehicle funding requests, current and future equipment requests, maintenance contracts and schedules, private enterprise involvement, program compliance, certifications and assurances, operating budget, and the overall management of the project. Several levels of review and discussion are held prior to the final recommendations for the Annual Program of Projects.

B. Funds Transfers

The State will not transfer Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities Program) funding to Section 5311 without first selecting projects eligible under Section 5310 program. The State will use the 5310 funds it transfers to Section 5311 only for Section 5310 program purposes (assisting private nonprofit groups in meeting the specialized transportation needs of seniors and individuals with disabilities). FTA no longer allows the transfer of Section 5310 to Section 5311 to supplement resources available under the rural grant program, as the law previously permitted.

VI. STATE ADMINISTRATION AND TECHNICAL ASSISTANCE

A. State Administration

Funding for State program administration is applied for on an "as needed"

basis. It is the goal of the State to keep these costs below the maximum permitted by FTA (currently 10%) and reserve the remaining funds for assistance to local projects.

B. Planning and Technical Assistance

With the exception of the Rural Transit Assistance Program (described below), Section 5311 funds are not used to support planning or technical assistance projects in Maryland. Maryland funds state-level and subrecipient planning and technical projects through the Section 5304 program.

Each LOTS in Maryland must have a (Transportation Development Plan) TDP that is updated every five years. This plan is a local plan that must be endorsed (i.e., approved or adopted) by local elected officials. Local officials' endorsement must be submitted to MTA/OLTS at the conclusion of the development of each update.

Generally, the MTA/OLTS initiates the TDP update process and contracts with a consulting firm to develop these plans; the local subrecipient provides up to 15% local match. Federal (S. 5304) and State technical assistance funds the remaining portion of the project cost. The consulting firm works with the local system, government authority, stakeholders, the local planning department, the local Transportation Advisory Committee, and MTA/OLTS to ensure that the plan is coordinated with other local and State plans and is feasible given the MTA/OLTS-administered funding for which the LOTS is eligible.

Eligibility for technical assistance funds to cover the cost of preparing the TDP is on a five-year cycle for each LOTS; allocations for planning funds for eligible LOTS are announced in each year's grant application package. The LOTS must apply for these funds as part of the ATP, described later in this chapter of the manual.

C. Rural Transit Assistance Program (RTAP)

The RTAP (49 U.S.C. 5311(b)(3)) provides a source of funding to assist in the design and implementation of training and technical assistance projects and other support services tailored to meet the needs of transit operators in rural areas. RTAP funds can be used to support rural transit activities in four categories: training, technical assistance, research, and related support

services. The RTAP in Maryland is administered by the MTA/OLTS as a complement to the Sections 5311, small urban 5307, 5310, ADA, and SSTAP.

The Federal goals of the RTAP are:

- To promote the safe and effective delivery of public transportation in rural areas and to make more efficient use of public and private resources;

- To foster the development of State and local capacity for addressing the training and technical assistance needs of the rural transportation community;

- To improve the quality of information and technical assistance available through the development of training, technology and technical assistance resource materials;

- To facilitate peer-to-peer self-help through the development of local networks of transit professionals;

- To support the coordination of public, private, specialized, and human service transportation services; and

- To build a national database on the rural segment of the public transportation industry.

In Maryland, RTAP funds are used to: develop and deliver training tailored to meet the specific needs of rural transportation providers, provide scholarships to assist eligible subrecipients in attending training, and purchase training materials that are shared with subrecipients through an RTAP lending library.

The annual program is developed in consultation with the Transportation Association of Maryland (TAM) Training Committee, a representation of public transit providers and specialized transportation operators. This Committee meets on a monthly basis and provides input on the selection of training programs, etc.

VII. PRIVATE SECTOR PARTICIPATION

Pursuant to the requirements of the FTA, it is the policy of MDOT MTA,

as the designated recipient and administrating agency for Section 5311 funds in Maryland, to require local Section 5311 applicants to provide an opportunity for private sector participation in the planning and provision of Maryland transportation services. This policy is implemented through the following procedures.

Private Provider Participation in Subrecipient Planning

To ensure the participation of private providers at the beginning of the project development process, an adequate number of private transportation providers must be afforded an opportunity to be a representative on any Transportation Advisory Committee established in conjunction with either the completion of a Transportation Development Plan (TDP) or TDP update, or with the completion of a feasibility study examining the initiation of a new transit project.

Subrecipient Application Requirements

To ensure the private providers are aware of the opportunity to participate in the provision of service, all private providers in the proposed service area of Section 5311 funded projects must be notified of grant submittal, in writing, to inform them of the intended service and to ascertain whether they can participate in the provision of service. This notification must be made at least 30 days prior to the submission of the grant application to local elected officials for their approval.

Section 5311 subrecipient applicants must provide the following to the MTA/OLTS in their annual applications for funds (the ATP):

- ***Documentation of Private Operator Notification*** - all private providers in the proposed service area of the Section 5311 and other funded projects must be notified in writing of the ATP, with information on the intended service and invitation to submit comments on the proposed program of projects and budget as well as
  the performance of the applicant. This notification must be postmarked at least 30 days prior to the submission of the ATP to the applicant's local elected officials for their approval.

- ***Private Sector Responses*** - The applicant must attach copies of any comments received from the private sector as well as the applicant's response to the comments, and describe how comments received from

private operators (either in writing or at the public hearing) were addressed and incorporated into the proposed program.

Complaints

Complaints regarding involvement of private providers in the local project development process and in the provision of service must be submitted in writing to the local applicant from the private operator. The local applicant will arrange a meeting within 15 days after receiving the written comments with the private provider and appropriate local officials to discuss these concerns. This meeting will be open to the public and minutes will be taken. The local applicant will submit his/her decision in writing within 15 days after the meeting. All written comments, correspondence, and meeting minutes must be submitted to the MTA/OLTS.

The decisions made by the local applicant as a result of this are final.

Technical Assistance

The MTA/OLTS staff will assist all Section 5311 applicants in complying with the regulations included in this document.

The MTA/OLTS staff will respond to requests for assistance by private providers to help them to participate in FTA funded services. This may include, but not be limited to, distributing and explaining the regulations included in this document, as well as directing them to appropriate local officials.

VIII. CIVIL RIGHTS

The MTA/OLTS and subrecipients must ensure that no person shall on the grounds of race, color, creed, national origin, sex, age, or disability be excluded from participating in, denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part through the Section 5311 program. This section describes how the State ensures that Section 5311 subrecipients meet the requirements of Title VI, Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE).

MTA/OLTS coordinates with MTA's Office of Fair Practices for implementation and oversight of the Title VI, EEO, and DBE processes and

requirements. The Equal Opportunity Compliance Program (EOCP) has ultimate responsibility for Civil Rights programs.

A. Title VI

On issues specifically pertaining to Title VI, OLTS staff will work with members of MTA's EOCP) to ensure subrecipients' compliance with FTA regulations.

MTA complies with its own Title VI requirements as an FTA recipient and in terms of state-level management of Section 5311 and other FTA funds. MTA also ensure that, at the local level, its subrecipients comply with Title VI requirements. MTA requirements for Section 5311 subrecipients are detailed following the description of state-level planning and funding distribution processes related to Title VI.

OLTS Program Management Related to Title VI

Statewide Transportation Planning Process

Each subrecipient develops and maintains a demographic profile of its jurisdiction that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI. This profile is submitted to MTA/OLTS.

Additionally, the MTA/OLTS staff collects demographic profiles of the jurisdictions through the statewide transportation planning process. The statewide transportation planning process is conducted as a compilation of several different existing planning processes. Each local jurisdiction that operates public transit services is required to have a Transportation Development Plan (TDP). The planning process used to develop this document specifically works to identify the needs of low-income and minority populations within each jurisdiction. Secondly, as was established under SAFETEA-LU for the Section 5310 as well as the former Section 5316 and 5317 programs, the MTA/OLTS has completed a locally developed, coordinated public transit-human services transportation plan for each region in Maryland, with the exception of the Washington Region in which the programs are administered by the Metropolitan Washington Council of Government. These documents comprehensively look at unmet transportation needs of individuals with disabilities, older adults, and

people with low incomes specifically those seeking employment and/or employment-related activities. These documents are supplemented with input and data received during other planning process such as the development of the Consolidated Transportation Plan (CTP), the Maryland Comprehensive Transportation Plan (MTP), Transportation Improvement Program (TIP), and Statewide Transportation Improvement Program (STIP). Together these documents will serve as MTA/OLTS's primary planning tools from which programming decisions and the development of the POP will be made.

Section 5311 Funding Distribution

Each County within the State of Maryland has a designated public transit operator, and Section 5311 operating funds are allocated to each County based on the formula described under III.A. Eligible subrecipients are outlined earlier in this SMP under Section II.A (Eligible Applicants and Subrecipients).

Each subrecipient is required to submit an ATP to the MTA/OLTS each year. MTA/OLTS reviews each application for completeness and accuracy. MTA/OLTS staff works directly with each applicant to gain a thorough knowledge of the projects requested in the ATP. Funding recommendations are broken down into two separate categories, (1) Operating and (2) Capital. Recommendations for FTA funding to support operating costs are based on maintaining existing transportation levels of effort across the State. Maintaining existing levels of transportation service delivery has exhausted the amount of funds available each year. Recommendations for FTA funding to support capital projects in each local jurisdiction are based on the following priority:

1. Capital needs that directly support existing services (items such as replacement vehicles, vehicle maintenance and bus replacement parts) receive priority.

2. Capital items that support administrative and operation functions are given second priority (items such as computer equipment, passenger stop amenities, and facility improvements fall into this category).

Title VI requirement that an equitable distribution of funds to subrecipients serving predominantly minority and low-income populations is achieved

through the MTA/OLTS's on-going monitoring of each local government's compliance with Title VI requirements as they operate existing services and the planning process detailed in the section above. As demographic changes are identified in the planning processes or public input identifies deficiencies in the existing levels of service delivery relative to minority and low-income populations, the MTA/OLTS staff will work directly with the subrecipient to identify changes to their existing services to better accommodate these needs. If the subrecipients fail to make appropriate service adjustments, this dynamic will be given consideration as funding recommendations are developed.

Once a funding recommendations list has been refined, it is forwarded to MTA Administrator for review and approval. The MTA Administrator is authorized by MDOT to make final project recommendation approvals and to submit applications to the FTA.

Criteria for Selecting Transit Providers to Participate in FTA Grant Programs

The MTA/OLTS will only award Section 5311 funds to local units of government for the delivery of open door general public transportation services.

Title VI Requirements for Subrecipients

For All LOTS

All Maryland LOTS, including Section 5311 subrecipients, are required by MTA/OLTS to:

- Establish a written policy of non-discrimination on the basis of race, color, and national origin.
- Designate a contact person responsible for implementation of Title VI for the transit system.
- Establish a written process for receiving, recording, responding to, and resolving Title VI investigations, complaints, and lawsuits. This process should include notification of MTA immediately when any investigation, complaint, or lawsuit is initiated.

- Notify the public of Title VI rights and procedures the public may follow to file a complaint.

- Sign and submit the certifications and assurances with the ATP.

- Report to MTA immediately any Title VI complaints received, or investigations or lawsuits initiated, as well as annually as part of the ATP certification and assurances.

- Develop a Limited English Proficiency (LEP) Plan, a written plan for providing access to meaningful activities and programs for persons with LEP.

- Develop a public participation plan and undertake steps to ensure that minority persons and LEP persons have meaningful access to these activities.

- Compile a written Title VI Policy and Program that includes the above items and must be submitted to the MTA Office of Fair Practices for review at least every three years.

For LOTS Which Operate Fixed Route Services

All LOTS which operate fixed route service are required to establish the following system-wide standards and policies in accordance with FTA Circular 4702.1B:

- Quantitative system-wide service standards for vehicle load, vehicle headway, on-time performance, and service availability; and

- System-wide service policies for distribution of transit amenities and vehicle assignment.

Monitoring Subrecipients

Subrecipients are required to provide detailed Title VI information to MDOT MTA on usage and performance of the project. The Title VI Investigations, Complaints & Lawsuit Log which is used to provide this detailed

information is submitted to the MTA/OLTS support staff along with an operating Request for Payment form quarterly. These quarterly reports will include financial and program measures updates.

The MTA/OLTS ensures that subrecipients maintain and demonstrate compliance with Title VI requirements through the following activities.

Annual Submittals

All subrecipients are required to sign an assurance document which is compliant with 49 CFR Section 21.7(a) and submit it to MDOT/MTA with their annual funding application. MTA/OLTS staff reviews this documentation for completeness and accuracy.

Any subrecipient who is applying for and or receiving funding for the first time is required to submit to the MTA/OLTS information regarding their Title VI compliance history if they have previously received funding from another Federal agency. This must include a copy of any Title VI compliance review activities conducted in the last three years, including the purpose or reason for the review, the name of the agency or organization that performed the review, a summary of the findings and recommendations of the review, and a report on the status and/or disposition of such findings and recommendations. This information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part. This submittal shall be made to the MTA/OLTS prior to any funding being awarded. MTA/OLTS staff reviews this documentation for completeness and accuracy. Any concerns identified as part of this review will be investigated fully prior to the awarding of FTA funds.

Each year all Section 5311 subrecipients are required to submit a funding application, the ATP. MTA/OLTS staff conducts a thorough and extensive review of each funding application. This review includes validating that all required documents are submitted and completed properly. This review also includes a subjective analysis of the project scope and the applicant's adherence to FTA requirements (Title VI requirements are part of this analysis). Applicants are also asked to submit printed and website material such as schedules, brochures, and other public outreach material including LEP documents as part of their application. This material is reviewed by MTA/OLTS staff for Title VI compliance.

There are different thresholds for compliance based on population and amounts of FTA funds received. Each year the subrecipients are required to submit documentation which defines what thresholds they need to meet in terms of Title IV compliance.

Public Notification

At a minimum, each subrecipient shall produce public notice outreach to inform the public of the subrecipient's Title VI obligations, apprise members of the public of the protections against discrimination afforded to them by Title VI, notify the public that the subrecipient certifies that they are in compliance with these requirements, and explain how the public can access the subrecipient's complaint process. Documentation of this effort shall be submitted to the MTA/OLTS once a year, through the ATP process. The subrecipients make their application available for public review and comment prior to the submission of the application to the MTA/OLTS. MTA/OLTS staff reviews this documentation for completeness and accuracy.

Reporting of Any Title VI Concerns

Each subrecipient shall notify the MTA/OLTS in writing about any complaints, lawsuits or FTA administrative activity within 3 business days of their knowledge of these actions. If the MTA/OLTS receives such a notification, the MTA/OLTS will immediately notify the MTA Office of Fair Practices. MTA/OLTS staff will be assigned to assist in the full investigation of the issue. If necessary, MTA/OLTS staff will then provide technical assistance to the subrecipient to assist in the development of

corrective actions and monitor the implementation of those corrective actions

Transportation Development Plan (TDP)

Subrecipients for Sections 5307, 5311, and 5339 funding are required to have a TDP. These plans are updated on a five-year cycle. As part of the TDP update, a critical assessment of the subrecipient's Title VI obligations and their ability to meet these requirements is conducted. This planning effort also serves as a tool to develop current and accurate data to identify locations of clusters of minority and low-come populations. MTA/OLTS staff provides technical assistance and guidance directly to subrecipient staff as the planning update process is conducted.

Training

The MTA/OLTS provides subrecipients with a comprehensive program manual detailing FTA and State requirements for the LOTS. A discussion of Title VI requirements is included in this document. Additionally, the MTA/OLTS hosts periodic mandatory training sessions to present various FTA program requirements, including Title VI.

Site visits

MTA/OLTS staff conducts quarterly meetings as part of MTA/OLTS's continuing and on-going technical assistance and monitoring. These meetings may be on-site or via conference call. The staff will conduct at least, one on-site visit, during which the staff is looking for visual indications of Title VI compliance. Additionally, as MTA/OLTS staff interacts with subrecipient staff, they will monitor for indications that the subrecipients have understanding of, and are adhering to, Title VI requirements.

On a triennial basis each Section 5311 subrecipient is scheduled to receive a comprehensive site visit and compliance review by MTA/OLTS staff. These reviews are conducted to assure all relevant FTA program regulations are being followed and implemented by our subrecipients. Title VI compliance is part of this review process. While on site staff will physically review any written policy documents and records subrecipients may have on file relevant to Title VI including LEP programs and complaint policy and procedures. Subrecipients will be charged with correcting any deficiencies identified during these audits. MTA/OLTS staff will work directly with subrecipients to provide technical assistance

and ensure the corrective actions are implemented in a timely manner. The checklist used to conduct these reviews is attached as Appendix D.

B. Equal Employment Opportunity (EEO)

A formal EEO program is required of any subrecipient that both employs 100 or more transit-related employees (including temporary, full-time or part-time employees either directly employed and/or through contractors) AND request or receive State/Federal capital or operating assistance in excess of $1 million the previous Federal fiscal year or receive planning assistance in excess of $250,000 in the previous Federal fiscal year. An abbreviated EEO Program is required of any subrecipient that both employs 50-99 transit-

related employees (including temporary, full-time, or part-time employees either directly and/or through contractors) AND request or receive State/Federal capital or operating assistance in excess of $1 million in previous Federal fiscal year, or request or receive planning assistance in excess of $250,000 in previous Federal fiscal year. The program requirements detail what must be included – workforce analysis, numeric goals and timetables, an assessment of past employment practices and proposed remedies for problem areas, and a monitoring and reporting system. Program updates are required every three years. MTA/OLTS monitors the status of its subrecipients toward meeting these thresholds on an annual basis.

MTA/OLTS requires that all Section 5311 subrecipients (whether or not they meet the Federal threshold for a formal EEO program) establish: a responsible party for ensuring compliance with EEO requirements; a written EEO policy statement; and an EEO complaint procedure. Employees and applications must be notified of the EEO policy and complaint procedure. Subrecipients are required to notify MTA/OLTS immediately of any EEO complaints and submit annually through the ATP the name of the responsible party, a report on complaints and their resolution, certification that EEO requirements are being met, and indication of whether the system has an official FTA approved program (if they meet the threshold requiring this).

In addition to the annual ATP submissions, MTA/OLTS monitors subrecipient compliance with EEO requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5311 subrecipients every three years. (See Appendix D for the LOTS Compliance Review checklist.)

The MDOT MTA Equal Opportunity Compliance Program (EOCP) is responsible for civil rights programs compliance. The EOCP reviews subrecipient EEO programs for compliance with Federal and State requirements, and submits these documents to FTA on behalf of those subrecipients meeting Federal thresholds for FTA program submissions. The EOCP also submits the EEO program and reports required for the State as the grantee.

C. Disadvantaged Business Enterprise (DBE)

MTA/OLTS has established an MTA/OLTS DBE Procurement Review Group (PRG). The PRG consists of MDOT MTA Procurement Officers, Project Managers and employees of the Equal Opportunity Compliance

Program (EOCP). PRG meetings are held bi-weekly to determine the DBE goals for MDOT MTA and subrecipients' contracts that are being offered for solicitation.

Goal Setting

For all subrecipient projects valued $50,000 or more. Projects between $25,000 and $50,000 will not be reviewed by the PRG but should be considered to be solicited among Small Business Enterprises (SBE) firms only. The LOTS must submit a request for procurement to the MTA/OLTS Regional Planner identifying the capital/operating project, the estimated project cost, the anticipated DBE goal/SBE designation, the DBE goal tabulation, the method of procurement and any procurement documents such as a Request for Proposal (RFP) which contains a scope of work (SOW). The LOTS procurement specialist is required to create a subcontracting analysis which identifies the subcontracting opportunities and an independent cost estimate (ICE) for the project with assistance from the MTA/OLTS Regional Planner as needed.

The MTA/OLTS Regional Planner forwards the LOTS request and documents to MDOT MTA's Procurement Department, which sends these on to the EOCP for review. The EOCP may adjust the LOTS' recommended DBE goals/SBE designation, in which case they will work directly with the LOTS' procurement officer to address such recommendations.

Solicitations

For all subrecipient projects valued $50,000 or more, the LOTS must advertise the procurement using a method of competitive procurement such as a Request for Proposal (RFP), an Invitation for Bid (IFB), etc., including the DBE project goal.

Before awarding the contract, the LOTS must send the recommended appropriate bidder's bid analysis, along with the package of MDOT DBE forms, to the Regional Planner, requesting concurrence to award the contract. Before the MTA/OLTS Regional Planner can issue concurrence, a DBE evaluation of the recommended bidder and DBE/SBE package is conducted by the EOCP.

Should the bidder/offeror submit a request for a waiver demonstrating

they are unable to achieve the DBE participation goal or SBE designation as outlined in the procurement solicitation, such as a RFP or IFB, etc., documentation is required from the bidder/offeror showing good faith efforts to obtain the specified DBE/SBE participation goal.

Contract Monitoring

For projects that exceed $50,000, following MTA/OLTS concurrence letter to the LOTS to award the project with a copy being forwarded to EOCP to serve as the official award date of the project, the EOCP will coordinate and conduct a conference call including the Regional Planner, the prime contractor, and the Subcontractor to establish reporting instructions and methodology for reporting. The prime and subcontractor will be required to submit the Monthly DBE Payment Report to the EOCP electronically as directed in the instructions given to them by EOCP by the 10th of the following month even if there is no payment activity. The payment report shall include: 1)identification of the DBE/SBE subcontractor participating on the project; 2)type of work being done by each DBE/SBE subcontractor; 3)dollar amount of project and each DBE/SBE subcontract; 4)actual monies paid during the reporting period and to date to the DBE/SBE subcontractors; and 5)comments by the contractor/subcontractor. The prime and subcontractor are expected to copy the LOTS and the RP with the monthly payment information being submitted to EOCP.

The MTA/OLTS Regional Planner will work with the EOCP should there be any issues of non-compliance indicated on the Monthly Payment Form submissions and/or within the project engineer's records which will be reviewed during the MTA/OLTS quarterly site visits.

Formal DBE/SBE Program for Section 5311 Subrecipients Meeting FTA Threshold

All subrecipients that receive $250,000 or more in FTA planning, capital (not counting transit vehicle purchases), and/or operating assistance in a State fiscal year are required have an MDOT MTA-approved DBE/SBE program. The requirement includes:

- A signed and dated DBE policy statement that expresses a commitment to the DBE/SBE program, states its objectives, and outlines responsibilities for its implementation. The statement must be circulated throughout the organization and to the DBE

and non-DBE business communities that perform work on FTA-assisted contracts (which can be achieved by including the policy statement in all procurements involving FTA funds).

- Establishment of an overall DBE/SBE goal for annual contract participation by disadvantaged businesses.

- Development and maintenance of a directory of DBE-certified firms to be notified when competitive procurements are advertised. All DBE's are SBE's. This directory must include each firm's address, phone number, and the types of work the firm has been certified to perform as a DBE. Each subrecipient must revise their directory at least annually and make updated information available to contractors and the public on request. Alternately, subrecipients may use the MDOT DBE directory rather than creating their own individual directories.

- Public participation that includes:

    - Consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations that could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and a grantee's efforts to establish participation of DBEs.

    - A published notice announcing proposed overall goals, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the principal office for 30 days following the date of the notice, and informing the public that comments on the goals will be accepted for 45 days from the date of the notice. The notice must include addresses to which comments may be sent. The notice must be published in general circulation media and be available in minority-focused media and trade association publications.

Reporting Requirements for Section 5311 Subrecipients Required to Have a Formal DBE Program (Meeting FTA Threshold)

- Annual Submittals – Subrecipients must submit overall DBE/SBE goals to MDOT MTA for review each year as part of their annual grant application process. Grantees required to have a written program that are part of a municipal government may be allowed to submit a single plan to FHWA if the municipality receives more funding from FHWA than from FTA. If this situation occurs, the subrecipient is expected to contact MTA's EOCP to confirm that a separate FTA program is not required. The subrecipient still must submit transit- specific goals to MTA on an annual basis.

- Good Faith Efforts – If a subrecipient awards a contract to a firm that does not meet the specific DBE contract goal, it must demonstrate it made a sufficient "good faith effort," as defined in 49 CFR Part 26, Section 26.53. Subrecipient contractors are required to obtain approval from the subrecipient's DBE Officer prior to substituting a DBE firm after a contract is awarded.

- Uniform Report of DBE Awards or Commitments and Payments – Subrecipients are required to report on DBE activity quarterly to MTA for inclusion in MTA's Uniform Report of DBE Awards or Commitments or Payments. The MTA EOCP provides standard report forms to subrecipients.

IX. MAINTENANCE

A. Vehicles

All Section 5311 subrecipients must have a written maintenance plan, and must establish a preventive maintenance (PM) program. Inspection and servicing of ADA-mandated accessibility equipment is required to be part of PM program, including cycling the lift as part of the pre-trip inspection. Subrecipients are required to adhere to the frequencies and PM schedule identified in their plan. MTA/OLTS monitors and measure adherence to this schedule as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5311 subrecipients every three years. (See Appendix D for the LOTS Compliance Review checklist.) Current MTA/OLTS standards allow for a 10% deviation from the schedule and at least 80% of scheduled services need to be within the 10% window. Grantees are also subject to quarterly PM reviews (see Appendix F for the Quarterly PM Check form) and random maintenance record checks.

Additionally, Section 5311 subrecipients must comply with the Maryland Preventive Maintenance Program requirements detailed under COMAR Title 11: Department of Transportation, Subtitle 22: Preventive Maintenance Program. This requirement applies to any bus designed and used to carry more than ten people owned by the State of Maryland or any political subdivision, excluding those subject to school bus regulations, as well as vehicles with a seating capacity for 16 or more passengers including the driver (as well as other types of commercial vehicles) owned by other types of organizations. Each vehicle must carry a certification documenting that preventive maintenance and inspections are performed and in compliance with State Preventive Maintenance Program requirements. MTA/OLTS checks annually for preventive maintenance certification as part of the ATP.

B. Facilities

Each subrecipient, for federally- or state-funded facilities, is required to have a facilities maintenance program in place to ensure that facilities are kept clean and in good repair, including accessibility equipment such as elevators and public address systems. This includes a written facility maintenance plan that includes a program of inspections and preventive maintenance activities. Subrecipients are required to inspect their facilities on an annual basis to determine upkeep and maintenance needs.

As noted above, MTA/OLTS conducts periodic maintenance reviews of LOTS which include review of the LOTS facilities maintenance plan and inspection of the facilities.

X. CHARTER RULE

As recipients of public transit funds, all LOTS sign a Charter Service Agreement. The agreement is contained in the Certifications and Assurances that become part of each subrecipient's Grant Agreement. In Charter Agreements, public transit grantees agree that the transit system, and each subrecipient or third- party contractors who use FTA-funded vehicles, may provide charter services using equipment of facilities

acquired with federal transit assistance only in compliance with FTA charter regulations, 49 CFR Part 604: eCFR :: 49 CFR Part 604 -- Charter Service.

The purpose of the FTA Charter Service rule is to protect private bus operators from unfair competition from transit operators who have access to Federal and State funds for purchasing buses, and Federal funds for their operation.

The current FTA rules on charter bus service by public transit operators receiving federal funds became effective on April 30, 2008, and was updated in July, 2025. These regulations allow for clear exemptions up front for some services, as well as exceptions under particular circumstances. The 2008 regulations also revised the definition of charter service, allow Advisory Opinions and Cease and Desist Orders, provide a clear complaint and hearing process, and provide a mechanism for determining remedies in the event of a violation.

FTA's charter service webpage is:
https://www.transit.dot.gov/regulations-and-guidance/access/charter-bus-service/charter-bus-service-regulations-0

Subrecipients who choose to pursue a charter service provision within the confines of Federal regulations are required to do the following in addition to the other procedures outlined in the LOTS Manual.

- Subrecipient must notify MTA/OLTS in writing prior to entering into an agreement to provide charter service.

- Any revenue generated from charter bus activity must be tracked and accounted for within the confines of the non-fare revenue policy detailed in the LOTS Manual.

MTA/OLTS will review subrecipients compliance with the charter regulation as part of its evaluation and monitoring practices described in XIII.F. of this State Management Plan.

XI. SECTION 504 AND ADA REPORTING

All Section 5311 subrecipients are required to comply with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, and assure that no individual is discriminated against on the basis of disability in connection with the provision of transportation service.
MTA/OLTS requires subrecipients to submit procurement documents to MTA/OLTS for concurrence before initiating the procurement. As part of

procurement oversight, MTA/OLTS verifies that all fixed-route vehicle specifications require ADA accessibility. Non-accessible demand-response vehicles are only permitted to be purchased when the demand-response system, when viewed in its entirety, provides an equivalent level of service for persons using wheelchairs as for ambulatory persons. Subrecipients are required to submit a Certification of Equivalent Service for annual grant requests for demand-responsive vehicles that are not accessible to persons using wheelchairs and reviews the makeup and utilization of the applicant's entire revenue vehicle fleet as part of the application.

MTA/OLTS requires every subrecipient providing fixed-route service (with the exception of commuter bus and intercity bus) to provide ADA- compliant complementary paratransit service. This service must meet the specific Federally established vehicle and service requirements and provide an equivalent level of service as the fixed-route service it is intended to complement. For systems that operate route deviation service:

- If deviations are available to all members of the public (not just persons with disabilities), the service is considered "Demand Response" and the system does not need to operate ADA complementary paratransit services.

- If deviations are only available for persons with disabilities, the LOTS must offer separate complementary paratransit as well.

Jurisdictions that provide ADA complementary paratransit service are required to have an approved ADA plan. ADA audits are performed on these jurisdictions periodically to ensure compliance. ADA plans are updated/revised based on recommendations from audits and due to changes in FTA regulations.

MTA/OLTS provides technical assistance to subrecipients on all aspects of ensuring transportation services are accessible to people with disabilities and compliance with the ADA. The Maryland LOTS Program Manual includes a 24-page chapter, and also addresses accessibility considerations in other chapters with regards to planning, public participation, facility development, maintenance, and emergency preparedness.

Subrecipient training funded by the Maryland RTAP program also frequently addresses aspects of ADA compliance. MTA/OLTS provides subrecipients with sample ADA-related policies and procedures for fixed

route and demand-response services (Appendices G and H), and related guidance for route deviation services (Appendix I).

MTA/OLTS monitors subrecipient compliance with ADA requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5311 subrecipients every three years. (See Appendix D for the LOTS Compliance Review checklist. ADA requirements are addressed in the Service Requirements/Restrictions section.) As part of this review, the reviewer looks at the subrecipient's website and printed materials to ensure that ADA-compliant service policies are in effect.

MTA/OLTS also inspects maintenance records of accessibility equipment as part of periodic maintenance review of each subrecipient.

XII. NTD REPORTING

Subrecipients and beneficiaries of FTA's Rural and Urbanized Area Formula Program grants are required by 49 U.S.C. 5335(a) and (b) to submit data to the NTD as a condition of the award. Each Section 5311 subrecipient is required to submit an annual report containing information on capital investment, operations, and service provided under Section 5311. Section 5311(b)(4) specifies that the report shall include information on total annual revenue, sources of revenue, total annual operating costs, total annual capital costs, fleet size and type, and related facilities, revenue vehicle miles, and ridership. Annual NTD reports should be a complete report of all transit activities, regardless of funding source.

The MTA/OLTS is responsible for ensuring that data is collected and compiled from each Section 5311 subrecipient and transportation provider in the State that benefits from the grant. This is accomplished through quarterly operating and financial statements required from each subrecipient, as well as annual data and updated capital asset inventories submitted as part of each subrecipient's annual grant application.

XIII. STATE PROGRAM MANAGEMENT

A. Procurement

All procurement activities are the responsibility of the local Section 5311

subrecipient. Local subrecipients use the procurement procedures of their jurisdiction as long as they conform to the minimum standards prescribed by the MTA/OLTS and in FTA Circular 4220.1G. In addition, the local subrecipient must maintain a contract administration system that ensures that all procurements funded wholly or in part with Section 5311 funds are done in accordance with the MTA/OLTS and Federal regulations.

The MTA/OLTS has adopted the procurement requirements and standards delineated in FTA Circular 4220.1G for the Section 5311 subrecipients in Maryland with the following exception: the State small purchase threshold is $50,000. For projects over $50,000, the subrecipient must pursue the same methods of procurement that are followed for FTA- funded projects that are $100,000 or more as described in Circular 4220.1G.

For projects up to $50,000 (State limit equivalent to FTA's threshold of $100,000), the subrecipient must solicit price or rate quotations from an adequate number of sources; the State requires at least two and preferably three quotes.

The State categorizes small procurements as follows, each with its own procurement guidelines:

- ***Category I (known as Micro-purchases under Federal methods):*** For purchases valued up to $5,000 for operating and $1,000 for capital, oral or written solicitation may be used. A written purchase order or contract is required if written solicitation is used. The subrecipient is responsible for ensuring that the price is fair and reasonable, and is encouraged to distribute multiple purchases equitably among local qualified suppliers. The basis for the award should be the judgment of the subrecipient's procurement officer. Once a subrecipient has identified a preferred vendor, MTA/OLTS concurrence is required prior to the issuance of a purchase order.

- ***Category II:*** for procurements more than $5,000 for operating and more than $1,000 for capital but not more than $15,000, oral or written solicitation may be made. A written purchase order or contract is required for Category II small procurements.

- ***Category III:*** for procurements more than $15,000 but not more than $50,000, written solicitation must be made (although it may be supplemented by oral solicitation), and the solicitation must be posted on

the eMaryland Marketplace.

All of these categories require an Independent Cost Estimate (ICE).

MTA/OLTS ensures subrecipient compliance with procurement requirements by requiring subrecipients to consult with their MTA/OLTS Regional Planner for any FTA- and/or MTA-funded purchases exceeding $1,000 for purchases funded by capital grants, and
$5,000 for purchases funded by operating grants. The MTA/OLTS must concur with subrecipient solicitation documents prior to the initiation of the procurement process for all items or services purchased with capital and technical assistance funds, as well as for all items purchased through small purchase, sealed bids, competitive proposal, competitive negotiation, or noncompetitive negotiation. This includes approval of bid specifications for vehicles and equipment.

The MTA/OLTS must also concur in writing with the recommendation for award prior to the execution of a local contract or purchase order for all items purchased through the methods mentioned previously. The MTA/OLTS will defer to the local subrecipient's procurement requirements if theirs are more stringent than the State's requirements.

MTA/OLTS provides periodic training to all subrecipients on procurement requirements. MTA/OLTS monitors subrecipient compliance with procurement requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5311 subrecipients every three to five years. As part of this review, documentation within the subrecipient's procurement files is examined.

B. Financial Management and Accounting Procedures

The MTA/OLTS provides for fiscal controls and accounting procedures in accordance with State laws and in compliance with all FTA requirements.

Information received from subrecipients will provide detailed information on expenditures and services provided in support of projects for payment for Section 5311 funds. The grant agreements held with subrecipients require that all funds be expended and accounted for as required by Federal, State, and local law. A-133 audits are required and received

annually from each subrecipient. This information, as well as records held by

the subrecipient, provide documentation for State and Federal review.

Closeouts of projects are conducted upon receipt of all final requests for payment and supporting information.

C. Property Management

FTA defines equipment as all tangible, nonexpendable, personal property that has a service life of more than one year and an acquisition cost that exceeds $10,000 per unit. Maryland Section 5311 subrecipients are required to maintain the following records on all MTA-funded vehicles and other equipment with a unit cost of $1,000 or more, as well as desk or laptop computers.

- A description of the equipment,
- A serial number or other identification number,
- Who holds the title,
- The acquisition date,
- The cost of the equipment,
- Percentage of Federal/State participation in the cost of the equipment,
- MTA grant or project number under which it was procured,
- FTA grant agreement number under which it was procured,
- the location, use, and condition of the equipment,
- useful life; and
- any disposition date, including the date of disposal and sale price of the equipment.

The title (if applicable) to all equipment must be vested in the name of the local subrecipient.

In accordance with FTA Circular 5010.1F, MTA/OLTS requires that subrecipients conduct a physical inventory of equipment and reconcile the results with the property records at least once every two years.

As part of the Annual Transportation Plan (annual grant application), subrecipients are required to submit a current Vehicle Inventory Form as well as a Fixed Assets Inventory Form for equipment and facilities purchased in whole or in part with the MTA and FTA funds.

- The Vehicle Inventory form requires the following information: route type, agency asset id number, vehicle identification number (VIN), current status, model year, make, model, vehicle type, length, seating capacity, wheelchair capacity, standing capacity, fuel type, delivered price, MTA grant number or other source, funding ratio (federal/state/local), in service date, , current physical condition, current mileage, minimum useful life (miles/years),expected useful life remaining (miles/years), earliest possible replacement year, owner, supports other mode, date of MTA approval to dispose, date of disposal, replacement vehicle. A second form requires utilization details (location, days and hours of use).

- The Fixed Assets Inventory form requires the following information: agency asset id, site name, address, building id, department (ops/admin./maint), asset category, asset type, description, funding ration (fed/state/local), transit agency capital responsibility, in-service date, renovation date, minimum useful life (years), estimated useful life remaining (years), earliest possible replacement date, owner, percent used for transit, date of MTA approval for retirement/disposal.

The Annual Transportation Plan also contains the FTA Certifications and Assurances requiring the applicant to have satisfactory continuing control over the use of project equipment and facilities. As part of their review of the Annual Transportation Plan, the MTA/OLTS staff will analyze 1) the previous awards made and 2) whether the capital still holds value to warrant listing. The MTA/OLTS staff will validate presence and condition of equipment during annual site visits.

Every agency must develop a transit asset management (TAM) plan if it owns, operates, or manages capital assets used to provide public transportation and receives federal financial assistance under 49 U.S.C. Chapter 53 as a recipient or subrecipient. Each transit provider must designate an Accountable Executive (49 CFR 625.5) to ensure appropriate resources for implementing the agency's TAM plan and the Transit Agency Safety Plan.

Each TAM plan should:

Outline how people, processes, and tools come together to address asset management policy and goals.
Provide accountability and visibility for furthering understanding of leveraging asset management practices.

Support planning, budgeting, and communications to internal and external stakeholders.

Each subrecipient must participate in the development of a Transportation Asset Management Plan (TAMP). The plan documents all capital assets, analyzes useful life, and sets target goals for maintaining a state of good repair. Tier I subrecipients participant in a joint TAMP plan; Tier 1 agencies must develop a TAMP specific to their agency. Quadrennial updates are completed on the TAMP, with annual asset updates and goal setting.

A control system must be developed by each subrecipient to ensure adequate safeguards to prevent the loss, damage, or theft of equipment. Any loss, damage, or theft shall be investigated. Adequate maintenance procedures must be developed to keep the property in good condition, as described in Section IX of this SMP. In cases of accidental or casual loss of project equipment, fair market value shall be deemed as the value of the equipment prior to its destruction. The local subrecipient must reinvest the insurance proceeds from the settlement for public transit purposes. FTA useful life requirements apply. If the asset has not reached its useful life, the appropriate payment should be made to replace the asset. Otherwise, documentation should be provided supporting the application of proceeds to the transit operation.

The MTA/OLTS also requires subrecipients to establish a facilities maintenance program, as describe earlier under Section II.B. of this SMP.

D. Vehicle Useful Life and Replacement Standards

Minimum Useful Life Standards

To ensure that vehicles are adequately maintained and remain in service for their normal service life, the MTA/OLTS has established minimum useful life standards for vehicles funded with state or federal funds. These standards apply to all vehicles purchased with Sections 5307, 5339, 5310, 5311, and State funds, and to all vehicles that will be replaced with vehicles funded from these programs, regardless of the initial funding source.

Service-life begins on the date the vehicle was placed in service and continues until it is removed from service.

Classification	Yrs.	Miles	LENGTH
Revenue Specialized Vehicles (Accessible Minivans, Vans, Accessible Taxicabs & Sedans)	4 years	100,000	n/a
Light Duty Bus	5 years	150,000	25' - 35'
Medium Duty Bus	7 years	200,000	25' - 35'
Heavy Duty Bus-Medium Size	10 years	350,000	30' – 35' '
Heavy Duty Bus-Large Size	12 years	500,000	Over 35'
Non-Revenue Specialized/ Fleet Support Vehicles (Pick-Up Trucks, Utility Vehicles & Sedans)	10 years	200,000	n/a

Useful life for trolley-buses (simulated, with rubber tires and internal combustion engines) is determined using the above useful life classifications.

Vehicle Classifications

If there is ever a question about what a certain vehicle's classification might be, the Altoona Test used for that vehicle is always the substantiating documentation as to its classification.

Although a minimum standard for useful life is adopted, additional information about the condition of the vehicle is necessary for all replacement requests. Vehicles will not be replaced based solely on age and accumulated mileage, therefore details such as repair records or estimated repair costs must be provided with the request. Also, it is important to note that if a vehicle is out of service/not being utilized for an extended period of time, the subrecipient must contact MTA/OLTS to determine how this will affect the vehicle's useful life criteria.

Below is minimum information that is requested to submit for a replacement vehicle, using forms provided in the annual grant application.

- Fleet Vehicle Number,
- Present Mileage,
- Vehicle Identification Number and delivery date (if the vehicle to be replaced was purchased under a previous Section 5307, 5339, 5310, 5311, or State grant),
- A description of the condition of the vehicle to be replaced, including the reasons for replacing the vehicle at this time; and

- An indication of how the vehicle will be disposed of (sell, salvage, or used as backup or other).

Replacement Prior to Meeting Minimum Useful Life Criteria

The MTA/OLTS considers the value prior to the end of normal useful-life to be based on straight line depreciation and that removal of an MTA/OLTS funded vehicle before the end of its normal service life, for any reason, requires notification to the MTA/OLTS. The subrecipient must describe the circumstances necessitating the replacement of the vehicle. The subrecipient would need to complete the information above, in addition to providing the following information:

- A list of any repairs that will be required to keep the vehicle in service, and an estimated cost of each repair.
- A description and cost of repairs made to the vehicle to date (attach the repair and preventive maintenance records, if available).

Upon notification, the MTA/OLTS will determine whether it retains further interest in the vehicle and whether reimbursement of the federal/state share of its remaining value must take place. For FTA/MTA- funded vehicles, after the normal service life is met, the MTA/OLTS no longer retains a financial interest in the vehicle. FTA/MTA approval is required prior to disposal of FTA/MTA-funded vehicles with remaining FTA financial interest.

E. Disposition

The subrecipient may dispose of vehicles and other equipment at the end of their useful life after notifying and receiving disposition instructions from the MTA/OLTS. The subrecipient must follow its locally adopted process to determine the fair market value of the equipment to be sold and concurrence must be received from the MTA/OLTS. Proceeds from the sale of the vehicle should be added to the subrecipient's transportation budget and utilized for transit capital projects, and must not be considered local match in any future request for payment. MTA/OLTS has established accounting requirements regarding grant- funded vehicle sales proceeds, to ensure that there is a paper trail demonstrating that such revenues are not used as local match or for operating expenses (attached as Appendix J).

The first $100 of the proceeds can be retained to cover administrative

expenses incurred. The MTA/OLTS requests that upon completion of the

sale, the subrecipient provide the sales receipt information and indicate on what capital item(s) they intend to spend the auction proceeds.

If the original purchase price was $1,000 or more, MTA/OLTS may request that the subrecipient remit back to MTA a proportional amount of the sale based upon the original grant ratio, deducting from this amount if necessary to ensure that the subrecipient retains at least $100 from the proceeds to cover handling expenses.

F. Evaluation and Monitoring

Monitoring is necessary to ensure that the MTA/OLTS's subrecipients meet Federal and State requirements. While the local subrecipients are required to sign and submit annual certifications and assurances to the MTA/OLTS, the MTA/OLTS actively examines all subrecipients to ensure that funds are being used as intended.

Monitoring local subrecipients serves several functions, including review of compliance with Federal and State requirements and review of LOTS service performance. Monitoring ranges from informal observation and review, to auditing compliance with Federal and State requirements, to enforcement of requirements in which a subrecipient is found to be deficient.

MTA/OLTS has established and follows an oversight program composed of the following 7 procedures:

1. **Providing Ongoing Subrecipient Training and Education**. Training will be provided twice yearly. Examples of upcoming topics include new Title VI program requirements; revised ADA program requirements; and new FAST ACT requirements for Transit Asset Management Plans and State of Good Repair Programs. The MTA/OLTS will provide periodic monitoring of subrecipients compliance with new program requirements.

2. **Conducting Subrecipient Triennial and Specific FTA Program Requirement Reviews**. The MTA/OLTS maintains a policy of conducting a full Triennial Review of each of the subrecipients in the State of Maryland (currently 22) once every three to five years. The MTA/OLTS conducts an annual review of risks and the findings of

completed Triennial Reviews and specific FTA program review findings to determine the next cycle order for its Triennial Reviews. The MTA/OLTS also conducts audits/reviews of particular FTA compliance requirements for all or some of its subrecipients based upon a state-wide demonstrated need, individual subrecipient finding(s) or changes in FTA requirements.

3. **Scheduling Quarterly and As-needed Subrecipient Meetings and Reviews With an Increased Emphasis on Continuing Program Oversight**. The MTA/OLTS maintains a policy to meet with each Maryland subrecipient on a quarterly fiscal year basis (four meetings per year). In an effort to provide enhanced oversight at the quarterly meetings, the MTA/OLTS will utilize these additional compliance procedures at least once (or more often as needed) during the quarterly meeting cycle: review outstanding FTA funded procurements; review current printed schedules and web site for required ADA, Title VI and service information; review status of implementation actions needed to resolve identified deficiencies.

4. **Annual Subrecipient Submittal of Single Audits**. MTA/OLTS will require annual submittal of each subrecipient's Single Audit conducted in accordance with 2 CFR Part 200 Subpart F, will review the audits findings, and will follow-up weekly with each subrecipient to ensure their compliance with any transit related findings within 90 days.

5. **Annual Submittal of Subrecipient's Grant Applications**. Annually the MTA/OLTS requires each subrecipient to submit a grant application providing detailed program description and information demonstrating compliance with federal and state requirements, certifications and assurances.

6. **Identification of Subrecipient's Common and Program-specific Deficiencies**. On an ongoing basis, the MTA/OLTS will review all compliance oversight activities that have occurred over the prior year to identify common and program specific deficiencies found for its subrecipients. The review will help determine new training opportunities, outstanding subrecipient deficiency findings for follow-up and new areas of compliance emphasis at quarterly meetings.

7. **Establishing and Maintaining an Active Review Process**. MTA/OLTS will ensure subrecipients implement timely actions and plans required to resolve deficiencies identified in the Single Audit, Triennial or specific FTA program requirement reviews by establishing achievable and mutually agreed deadlines, conducting as-needed and programmed status meetings, and providing sample templates and acceptable program specific information to subrecipients. Subrecipient failure to meet deadlines will be reviewed on a case-by-case basis to determine further remedial or corrective actions.

G. Elderly and Persons with Disabilities/Medicare Half Fare

The MTA/OLTS stipulates that Section 5311 subrecipients must follow Federal Section 5307 requirements for fares charged to elderly persons, persons with disabilities, and Medicare cardholders. Elderly persons, persons with disabilities, and persons with valid Medicare cards may be charged fares no higher than one-half of the rates generally charged other passengers by Maryland LOTS. This State requirement also applies to route deviation and commuter bus service, but does not apply to demand-responsive service.

This reduced fare must be included in the system's fare policy wherever it is published or posted, including route and schedule brochures, fare brochures, and other public information related to fares. This policy must also be publicized internally to subrecipient staff.

Federal guidelines define the elderly as persons aged 65 or more. However, at the discretion of the local transit system, the minimum age may be younger in order to qualify for half fare. It may be simplest to utilize the same minimum age as used for SSTAP service eligibility (a locally-determined threshold). The MTA/OLTS strongly recommends consulting with the subrecipient's local Area Agency on Aging and Advisory Committee on this matter.

Local subrecipients may require persons with disabilities and elderly persons without valid Medicare cards to obtain a reduced fare I.D. card to qualify for the half fare. Requiring some form of documentation to verify disability (such as a letter from a physician or caseworker) reduces the possibility of non-eligible persons fraudulently taking advantage of the reduced fare.

H. Construction/Renovation of Facilities

The MTA/OLTS assists, reviews, and approves local projects during all phases of construction or renovation. Technical assistance is available for local subrecipients in the development and evaluation stage, for environmental reviews and compliance, for design and engineering, and during construction. An MTA in-house team of appropriate experts is compiled to work with the local project manager and the local contractors. The MTA/OLTS technical assistance construction management oversight does not replace the need for subrecipient to provide on-site project management type activities, nor does MTA/OLTS directly contracts for local construction or renovation projects.

I. Agency Safety Plan

On July 19, 2018, FTA published the Public Transportation Agency Safety Plan (PTASP) Final Rule, which requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS).

The PTASP rule became effective on July 19, 2019.

FTA published a Notice of Enforcement Discretion on April 22, 2020 effectively extending the PTASP compliance deadline from July 20, 2020 to December 31, 2020.

FTA published a second Notice of Enforcement Discretion on December 11, 2020 effectively extending the PTASP compliance deadline to July 20, 2021.

The plan must include safety performance targets. Find additional guidance on planning and target setting on FTA's Performance-Based Planning pages.

Transit operators also must certify they have a safety plan in place meeting the requirements of the rule by July 20, 2021.

The plan must be updated and certified by the transit agency annually.

The rule applies to all operators of public transportation systems that are recipients and sub-recipients of federal financial assistance under the

Urbanized Area Formula Program (49 U.S.C. § 5307). However, FTA is deferring applicability of this requirement for operators that only receive funds through FTA's Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program (Section 5310) and/or Rural Area Formula Program (Section 5311).

The rule does not apply to agencies that are subject to the safety jurisdiction of another federal agency, including passenger ferry operators regulated by the U.S. Coast Guard and rail operators regulated by the Federal Railroad Administration.

OLTS requires each of its subrecipients to develop and maintain an Agency Safety Plan in accordance with the FTA regulation. As part of quarterly reporting requirements, all subrecipients must report safety incidents and events. Annually, subrecipients must set safety goals.

XIV. COMPLIANCE WITH OTHER FEDERAL PROVISIONS

A. Legal

The subrecipient must be eligible and authorized under State and local laws to request, receive, and dispense Federal Transit Administration (FTA) funds and administer FTA-funded projects. The organization's Authorizing Resolution must identify the individuals authorized to act on its behalf. To meet this requirement, an authorized person should sign the Annual Certifications and Assurances and have attached an Opinion of Counsel (signed by attorney) affirming legal authority. The annual assurances must also include the date of authorizing resolution and the location where it is on file. Two other legal issues include the need to 1) certify that the organization has not been excluded from participating in federally-funded projects (known as the Debarment, Suspension, and other responsibility matters or Integrity Clause), and 2) certify that the agency does not use Federal funds to lobby and, if using non-Federal funds to lobby, has filled out the proper disclosure forms (Standard Form LLL). The Debarment/Suspension and Lobbying certifications for each organization are required annually as part of the annual assurances section of the ATP. (Note that each subrecipient must also obtain these certifications for any third-party contract over $100,000, as discussed below).

B. Financial

The subrecipient system must have the ability to match and manage grant funds, to cover operating deficits through long-term stable and reliable sources of revenue, to maintain and operate federally funded facilities and equipment, and to conduct an annual independent organization-wide audit in accordance with the provisions of 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Subpart F The subrecipient will prepare an annual budget that incorporates future financial needs. In addition to an annual audit, if the organization uses Federal funds to cover indirect costs (e.g., an overhead rate from a parent organization), they must have an approved cost allocation plan.

C. Technical

The subrecipient must be able to implement the projects included in the grant application and grant agreement using sound management

practices. The subrecipient must have adequate procedures in place to manage the grants including procedures to submit timely, complete reports to the MTA/OLTS, close out grants in a timely manner, and effectively manage and deliver transit services.

D. Labor Protection

As a part of the Annual Transportation Plan, all Section 5311 applicants must agree to adhere to the requirements of the 5333(b) warranty.

E. Environmental Protection

Environmental protection requirements are met whenever Section 5311 funds are used for capital projects.

- Section 5311 projects must comply with the joint FHWA/FTA guidelines on protection of the environment titled "Environmental Impact and Related Procedures" (23 CFR §771).

- The regulation categorized projects in three classes according to degree of environmental impact:

    - Class I projects have a significant effect on the environment and, therefore, require the preparation of an Environmental Impact Statement (EIS).
    - Class II projects do not normally have a significant environmental

impact and as such are "categorically excluded" from the requirement to prepare further environmental assessment or impact studies.

- Class III projects are those where the significance of the environmental impact cannot readily be determined and require a brief Environmental Assessment.

A majority of the projects funded through Maryland's Section 5311 program will be classed as categorical exclusions (CEs). Larger construction projects or projects in sensitive areas may require the preparation of an environmental assessment (EA). All potential projects will be screened by the MTA Office of Planning's Environmental Division and MTA's Office of Planning's Environmental Division will make an initial determination as to which projects meet the criteria for categorical exclusions and which may require additional documentation. Since the MTA/OLTS staff maintains a close working relationship with its subrecipients, projects that do not qualify as a categorical exclusion can be identified early in project development; therefore activities can be coordinated with the FTA Regional Office so that any necessary environmental analysis and reviews will not delay implementation.

F. Clean Air Act

The Clean Air Act Amendments of 1990 established many substantive requirements to bring air quality regions that violate the national ambient air quality standards into attainment by prescribed dates. The MTA and subrecipients must comply with the requirements of the Clean Air Act, if applicable.

G. Buy America, Pre-Award and Post-Delivery Audits

As part of the Annual Transportation Plan (annual grant application) certifications and assurances all Section 5311 subrecipients agree to comply with FTA's Buy America regulations, as well as Rolling Stock Reviews and Bus Testing Certifications. In addition, solicitation and contract documents for all capital procurements, as well as for any procurement conducted through sealed bids, competitive proposal and noncompetitive negotiation, must be reviewed by the MTA/OLTS for compliance with all applicable regulations.

The MTA/OLTS has provided information to all subrecipients procuring vehicles on the pre-award and post-delivery audits as well as specific

language to be included in bid documents. The MTA/OLTS will not process any payments for vehicles without the pre-award and post- delivery audit certifications attached to the request for payment as well as the Transit Vehicle Manufacturer (TVM) certification of compliance with subpart D, part 26 (when applicable). Compliance will also be certified on the Annual List of Certifications and Assurances. The MTA Office of Procurement will procure vehicles on behalf of subrecipients which not only reduces the administrative burden, but also results in lower prices for higher quantity purchases.

H. Drug and Alcohol Testing

Section 5311 subrecipients are required to comply with FTA Drug and Alcohol Testing regulations for safety-sensitive positions. The MDOT MTA Office of Human Resources has provided all necessary information for compliance with the Drug and Alcohol Testing regulations required by 49 U.S.C. 5331, as well as technical assistance and training to properly implement the regulation. The MDOT MTA Office of Human Resources will continue to assist MTA/OLTS and use its established monitoring program to ensure that all Section 5311 subrecipients are in compliance with the regulations.

The subrecipient requirements for FTA Drug and Alcohol Testing, as detailed in the Maryland LOTS Manual, are found in Appendix K to this State Management Plan.

I. Drug-Free Work Place

All subrecipients are required to maintain a drug-free workplace for all employees and to have an on-going drug awareness program. A written policy is mandatory as prescribed by the Drug-Free Workplace Act and employees must be notified that it is unlawful to manufacture, distribute, dispense, possess, or use a controlled substance in the workplace. It is also required for subrecipients to have a drug and alcohol testing program for all safety-sensitive employees.

The Drug-Free Workplace Act (DFWA) of 1988 and the FTA's requirements for the prevention of drug and alcohol use in transit operations mandate that all Federal contractors and subrecipients host a drug free environment. Providing a drug free environment promotes a level of safety and comfort within the workplace. There are several components involved in complying with these laws that the MTA Office of Human Resources requires

subrecipients to abide by:

- Employers must publish and disseminate a policy statement informing their employees that it is unlawful to manufacture, distribute, dispense, possess, or use a controlled substance that is prohibited in the workplace;
- Employers must establish a drug-free awareness program including informing employees of the dangers of drug abuse and any available drug counseling, rehabilitation, and employee assistance programs;
- Employees must be informed as a condition of their employment that they have to abide by the policy, including notifying their employer of a drug conviction within five days;
- Employers must notify the MTA/OLTS of an employee's drug conviction within ten days;
- Employers must impose a penalty on an employee or require participation in a drug abuse assistance program for convicted employees; and

- Employers must "make an on-going, good faith effort to maintain a drug free workplace by meeting the requirements of the Act." It is important to note that the preceding is merely a basic outline of the government's requirements.

J. Safety and Security

MTA/OLTS requires all Section 5311 subrecipients to develop and implement a Safety and Security Program that addresses six core areas: security, driver/employee selection, driver/employee training, vehicle maintenance, drug and alcohol abuse programs, and safety data acquisition and analysis.

MTA/OLTS requires that subrecipients have in place a policy limiting the use of cell phones and other portable electronic communication devices for its employees and subcontractors. Copies of these policies must be submitted with each annual application.

The Section 5311 subrecipient is required to document that it is spending at least one percent of the Federal funds it receives annually for transit security projects or that such expenditures are not necessary. This certification is part of the annual certifications and assurances and must be documented annually within the Annual Application.

For subrecipients that spend the one percent, examples of appropriate security expenditures include increased lighting in or adjacent to a transit system (including bus stops, parking lots, and garages), increased camera surveillance of an area in or adjacent to that system, emergency telephone line or lines to contact law enforcement or security personnel in an area in or adjacent to that system, and any other project intended to increase the security and safety of an existing or planned transit system. Subrecipients should provide detail on how these funds were spent in their Annual Transportation Plan.

MTA/OLTS has sponsored numerous safety and compliance training workshops and trainer certifications through the Maryland RTAP program. In FY 2023, the Maryland RTAP sponsored Certified Community Transit Supervisor (CCTS) and Certified Transit Program Administrator (CTPA) trainings offered through CTAA, designed to address emerging requirements under IIJA) which certified individuals at Section 5311 subrecipient agencies, the MTA, and other FTA-funded LOTS throughout the state.

K. Flexible Funding

Flexible funds are certain legislatively specified funds that may be used either for transit or highway purposes. MDOT may transfer Surface Transportation Program (STP) funds, Congestion Mitigation and Air Quality (CMAQ) funds, and certain other flexible funds, from FHWA to FTA to use for transit projects. The funds may be transferred for any non- operating purpose eligible under FTA's Urbanized Area Formula Program (Section 5307), the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310) and the Nonurbanized Area Formula Program (Section 5311), (including preventive maintenance) and project administration. The primary flexible fund programs are the STP, and the Congestion Mitigation and Air Quality (CMAQ) Improvement programs, although other programs have some limited intermodal flexibility. Opportunities for transfer of FHWA funds to FTA-sponsored programs will be considered by MDOT MTA on a case-by-case basis.

Congestion Mitigation and Air Quality (CMAQ)

The primary purpose of the CMAQ program is to improve air quality in areas designated by the U.S. Environmental Protection Agency (EPA) as

"nonattainment" areas. Because CMAQ funds are intended to improve air quality, funds must be spent in nonattainment or maintenance areas. A nonattainment area is an area formally designated by EPA as not meeting the National Ambient Air Quality Standards (NAAQS). A maintenance area is an area that was nonattainment but has subsequently attained the NAAQS and officially designated to attainment by EPA. CMAQ funds may be used for transit capital projects and operating expenses for new service. Funds may only be used in nonattainment and maintenance areas and projects must demonstrate an air quality benefit. Operating assistance is limited to new or expanded transportation service and is limited to three (3) years.

Surface Transportation Program (STP)

The primary purpose of STP funds is for construction, reconstruction, rehabilitation, resurfacing, restoration, and operational improvements for highways and bridges including construction or reconstruction necessary to accommodate other transportation modes. Capital costs of transit projects that are eligible under 49 U.S.C. 53, including vehicles and facilities, publicly or privately owned, that are used to provide intercity bus service; carpool projects and fringe and corridor parking facilities;

transit safety infrastructure improvements and programs; transit research, development and technology transfer; surface transportation planning programs; or public transportation management systems under 23 U.S.C. 303.

L. Real Property Acquisition and Relocation Assistance

If a grant applicant intends to use Federal financial assistance in a project which will require real property, the applicant must provide assurance (required by Sections 305 and 210 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act)) that it will comply with the Uniform Act and with U.S. Department of Transportation (DOT) implementing regulations (49 CFR part 24).

Real property may be contributed as part of the local matching share. Credit can be allowed only for that portion of the property needed to carry out the scope of the project. Federal funds must not have been used to purchase any property proposed as local matching share. The contribution-in-kind property will be valued at its current market value and when incorporated into the project will be subject to the same reporting and

disposition requirements required of all project property.

The MDOT MTA Real Estate Division is an internal resource that is involved in all facilities projects. The Real Estate Division is available to assist subrecipients to ensure compliance with the State and Federal regulations.

M. Public Hearing Requirement

The public hearing requirement in 49 U.S.C. 5323(b) for capital projects was amended by SAFETEA–LU. The law now associates more clearly the public involvement and hearing requirements for capital projects with the environmental review required by the National Environmental Policy Act (NEPA) and its implementing regulations. It also broadens the requirement to apply to all capital projects (as defined in 49 U.S.C. 5302).

As a requirement of the National Environmental Policy Act (NEPA) and its implementing regulations, all grant applicants must provide an adequate opportunity for public review on projects, and, after providing notice, must hold a public hearing on the project if the project affects significant economic, social, or environmental interests. The MTA/OLTS requires that the subrecipient provide proof that the notice was published.

A public hearing on environmental assessments (EAs) that have a high probability of being elevated to EISs is also required, ensuring that the applicant has complied with the public hearing requirement to include in the environmental record for the project.

To comply with 49 U.S.C. 5323(b), any application for a project that will "substantially affect a community or the public transportation service of a community" shall include a certification to the effect that the applicant has:

- Provided an adequate opportunity for public review and comment on the project;
- After providing notice, held a public hearing on the project if the project affects significant economic, social, or environmental interests;
- Considered the economic, social, and environmental effects of the project; and
- Found that the project is consistent with official plans for the development of the community.

Title 49 U.S.C. 5323(b)(2) further states, "Notice of hearings under this

subsection shall include a concise description of the proposed project; and shall be published in a newspaper of general circulation in the geographic area the project will serve." Section 5323(b) must be read in concert with Section 5324(b) which states that FTA must review the public comments and hearing transcript to ascertain that an adequate opportunity to present views was given to all parties having a significant economic, social, or environmental interest in the project, and that FTA must make a written finding to this effect.

N. Debarment and Suspension

FTA recipients and subrecipients are prohibited from contracting for goods and services from organizations that have been suspended or debarred from participating in federally assisted contracts. It is the responsibility of the State and subrecipients as well as contractors and subcontractors with contracts exceeding $100,000, to certify that they are not suspended, debarred, ineligible, or voluntarily excluded from participation.

Section 5311 subrecipients agree to the Debarment/Suspension certifications as part of their annual grant applications.

For procurements $25,000 or more, subrecipients are required to search the System for Award Management (SAM) to make sure they are not entering into contacts with excluded parties. They must also include a term or condition requiring compliance with the debarment/suspension requirement in any subgrants, procurement solicitations and lower tier transactions $25,000 or more.

O. Restrictions on Lobbying

FTA recipients are prohibited from using Federal financial assistance to influence any Member of Congress or an officer or employee of any agency in the connection with the making of any federal contract, grant, or cooperative agreement. MTA and Section 5311 recipients of grants exceeding $100,000 must sign a certification so stating and must disclose the expenditure of non-federal funds for such purposes (49 CFR part 20). Other Federal laws also govern lobbying activities. For example, federal funds may not be used for lobbying Congressional representatives or senators indirectly, such as by contributing to a lobbying organization or funding a grass-roots campaign to influence legislation (31 U.S.C § 1352). General advocacy for transit and providing information to legislators about the

services a recipient provides in the community are not prohibited, nor is using non-federal funds for lobbying, so long as the required disclosures are made.

Currently, subrecipients certify to MDOT through the grant agreements and the annual certifications and assurances. Specific contracts, grants or cooperative agreements are actions covered by the restrictions on lobbying. Activities such as submitting grant applications, status inquiries, and professional and technical services are not lobbying and do not need to be disclosed. Efforts to influence Federal officials about specific grants and contracts or to ask Congressional representatives for support of a particular application or bid must be disclosed. Also, lobbying restrictions do not apply to activities that might influence policy issues.

Subrecipient responsibilities:

- Sign a certification of compliance pertaining to lobbying activities.
- Where third party contractors are involved, subrecipients must obtain a signed certification of compliance from the contractor.
- If non-federal funds have been used to support lobbying activities in connection with a grant from MTA, and the subrecipient receives federal grants exceeding $100,000, fill out Standard Form-LLL and submit it to MTA/OLTS.
- If contractors received more than $100,000 in federal funds and used non-federal funds to support lobbying, subrecipients must obtain the completed Standard Form-LLL from the contractor and submit it to MTA/OLTS.

P. Commercial Drivers License (CDL)

According to Federal and State regulations, an individual may not operate a commercial motor vehicle unless that person has a valid CDL, involving passing both a written and driving CDL exam as well as a DOT physical. For the purpose of LOTS, the commercial motor vehicle would refer to any vehicle that is designed to carry 16 or more passengers including the driver, or that has a gross vehicle weight rating or gross vehicle weight of 26,001 pounds or more. It is important to note that mechanics that maintain and drive commercial motor vehicles must have a CDL. Every two years, CDL holders must pass a physical examination with certain requirements outlined by the U.S. DOT. A DOT physical certification is issued upon passing the physical; this document must be carried by the CDL holder

while operating a commercial vehicle.

It is the responsibility of the LOTS to track renewal needs for these documents and ensure that drivers renew them on a timely basis.

Q. School Bus Protections

FTA subrecipients are prohibited from providing exclusive school bus service unless it qualifies under specified exceptions. In no case, however, can federally-funded equipment or facilities be used for exclusive school service. This includes transportation to or from any before-or after-school activities. The implementing regulation (49 CFR Part 605) does permit regular service to be modified to accommodate school students along with the general public. The FTA considers Headstart to be a social service program rather than a school program. Rules for the Head Start program limit the types of vehicles which may be used to transport children participating in the Headstart Program. Subrecipients may operate multi- functional vehicles that meet the safety requirements for school transportation, but may not provide exclusive school service.

R. Satisfactory Continuing Control

Capital management is an important aspect of public transit since it affects the safety, marketability, and financial integrity of the transit system. Transit is dependent on its capital equipment to accomplish its mission. Subrecipients of federal dollars administered by the MTA/OLTS are required to certify that any property purchased with those funds is used for public transportation services within the subrecipient's service area or other area described in the grant application for the useful life of the equipment or facility. Additionally, the subrecipient must annually certify that it has or will have satisfactory continuing control over the use of the equipment and facilities through operation or lease or otherwise.

All property acquired using federal funds must be utilized and disposed of in accordance with the applicable FTA program circular, FTA Circular 5010.1F (as amended) and 49 CFR 18 or 49 CFR 19. Title to all property purchased with Section 5311 funds must be vested in the name of the subrecipient.

Subrecipients are required to maintain the property at a high level of

cleanliness, safety, and mechanical soundness. Each subrecipient must establish a maintenance program that, at a minimum, meets the equipment manufacturer's recommendations. MTA/OLTS has the right, and obligation, to review the transit system's maintenance and safety programs and to conduct periodic audits of equipment and facilities funded with state and federal funds administered by MTA/OLTS.

The subrecipient must have the requisite fiscal capability to carry out the project and is responsible for maintaining required insurance coverage, property records, conducting physical inventories, implementing adequate property control systems and maintaining the equipment in proper working condition. Documentation must be available upon request.

Subrecipients must maintain control over Federally funded property; ensure that it is used in transit service, and dispose of it in accordance with Federal requirements. If the subrecipient leases Federally funded property to another party, the lease must provide that the subrecipient satisfactory provides continuing control over the use of that property. Control over FTA-funded facilities and equipment is determined in two areas: real property (land) and facilities; and personal property (equipment and rolling stock, both revenue and non-revenue).

Incidental Use of Equipment or Property

On an incidental basis, a subrecipient may use a Section 5311 vehicle for non-passenger transportation such as meal or package delivery, if this incidental use does not result in a reduction of service quality or availability of public transportation service. If used for meal delivery, the nutrition program is expected to pay for the operating costs attributable to meal delivery.

Subrecipients may also make incidental use of Section 5311 real property when it can raise additional revenues for the transit system or, at a reasonable cost, enhance system ridership. If a subrecipient leases part of an intermodal terminal developed with FTA assistance to an intercity bus operator, the subrecipient is permitted to charge a nominal rent (e.g. $1.00). The intercity operations are treated as incidental use, and the intercity operator must pay rent to the subrecipient. If subrecipients wish to charge more than a nominal amount, they may do so, up to fair-market rates. The subrecipient should select the carriers afforded below-market rents on the basis of a competitive selection process. The income from the incidental use must be

applied to transit expenses.

S. Fare Increases and Major Service Reductions

Prior to implementing any fare change or a major service reduction, a subrecipient must provide a formal opportunity for public comment.

The subrecipient is expected to have a written policy that describes the public comment process on increases in the basic fare structure and on major service reductions. The written policy must include a definition of what the subrecipient considers a "major service change". The policy should provide an opportunity for a public hearing or public meeting for any fare increase or major service reduction and should describe how such meetings will be conducted and how the results of such meetings will be considered in the process of changing fares and service. A public meeting is not mandatory; however, an opportunity for a public meeting in order to solicit comment must be given.

Subrecipients are required to provide a 30-day public comment period for all fare changes and major service reductions, and all comments received must be considered before final decision is made to implement the proposed changes.

In addition to the public comment period, subrecipients must notify customers and the MTA/OLTS in writing at least 30 days in advance of changing service or fares. This can be done as part of the public comment period required for proposed fare changes and major service reductions as described above, unless there is significant public comment received that necessitates further deliberation prior to changing fares or services.

XV. INTELLIGENT TRANSPORTATION SYSTEMS (ITS)

The ITS Architecture policy requires that the regional ITS Architecture must be a part of the local planning process and be consistent with and be reflected in the Transportation Plan, TIP, and STIP. The lead agency may be the MPO or the State Department of Transportation. The subrecipient must be an active participant in the development of local ITS Architecture. ITS projects funded by the Highway Trust Fund and the Mass Transit Account will conform to the National ITS Architecture, as well as to United States Department of Transportation adopted ITS standards.

The MD Architecture is the Regional ITS Architecture for the State of Maryland. The MD Architecture is based on the NITSA as adapted to Maryland. An ITS Architecture is a framework that (1) identifies ITS systems, and (2) defines the interfaces among the systems. A Regional ITS Architecture refers to a specific architectural framework sharing common ITS systems, institutions, needs, and interests across a single, interlinked geographic area. It is a regional framework for ensuring institutional agreement and technical integration for the implementation of ITS projects, or groups of projects.

Maryland Statewide ITS Architecture Conformity Form (Form) is designed to help ensure that ITS project conform to the Maryland Statewide Intelligent Transportation Systems (ITS) Architecture (MD Architecture). Any agency or agencies developing an ITS project should submit a Form. Those agencies seeking federal or state funding must submit a Form. Moreover, if you are seeking federal funding (from the Highway Trust Fund or its Mass Transit Account), the Form requests information required to obtain federal funding for your project.

ITS projects involve technologies and operational enhancements that work together to deliver state-of-the-art transportation services. They represent a broad range of solutions aimed at making the transportation infrastructure more effective and efficient through the collection, exchange and dissemination of transportation-related information among transportation agencies, public safety agencies, travelers, private companies, the general public and others.

Common application includes automatic vehicle location for transit vehicles. ITS projects can comprise:

- New or enhanced systems,
- Operations and maintenance of existing systems,
- One or more transportation modes,
- One jurisdiction or encompass several, and/or
- Be components of larger projects, e.g., purchasing ITS equipment as part of a transit bus procurement or highway construction.

XVI. STATE MANAGEMENT PLAN UPDATE

Revisions to the State Management Plan will only be made when significant changes occur in the Federal Section 5311 Program or when major changes occur

in the State administration of the program.

When program changes occur and updates to the State Management Plan are required, the draft version of the plan will be placed on the Maryland Transit Administration's website for review. There will be a designated timeframe for comments to be received and comments will be considered for inclusion in the final version of the State Management Plan.

MARYLAND STATE MANAGEMENT PLAN

SECTION 5339
Grants for Buses and Bus Facilities Program

MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Updated July, 2025

Office of Planning
6 St. Paul Street
Baltimore, Maryland 21202-1614

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I. Introduction / Background

Section 5339 – Bus and Bus Facilities Formula Program provides federal funding to support the continuation and expansion of public transportation through capital projects to replace, rehabilitate, and purchase buses and related equipment, and to construct bus-related facilities.

Section 5339 of the Federal Transit Act (USC 49) authorizes the US Secretary of Transportation to apportion funds under this section to designated recipients in large urbanized areas (UZAs) and states. States and designated recipients are responsible for receiving and apportioning these funds to eligible projects, and applying for funds on behalf of all eligible subrecipients within the applicable urbanized area or rural areas. The Federal Transit Administration (FTA) apportions the Section 5339 funds to existing Section 5307 or new 5339 designated recipients for large urbanized areas and to the states for all areas under 200,000 (small urbanized and rural areas).

In Maryland, the Maryland Transit Administration (MTA) of the Maryland Department of Transportation (MDOT) has been designated by the Governor to receive these funds and administer the program in the rural and small urbanized areas. Because MTA is also the FTA designated recipient for both the Baltimore and Aberdeen--Bel Air South--Bel Air North large UZAs, MTA also administers the Section 5339 program for the large UZAs within Maryland.

The Section 5339 program was created by FTA's authorizing legislation, the Moving Ahead for Progress in the 21st Century Act (MAP-21), Pub. L. 112-141, which was signed into law on July 6, 2012, and effective on October 1, 2012. The program is rooted in previous FTA programs, most recently the former Section 5309 program, and originating with the former Section 3 program established by the original transit authorization in 1964.

Congress established the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On December 4, 2015, President Obama signed the Fixing America's Surface Transportation (FAST) Act, reauthorizing surface transportation programs through the Fiscal Year 2020.

Congress established the funding for FTA programs through authorizing legislation that amends Chapter 53 of Title 49 of the U.S. Code. On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58, also known as the "Bipartisan Infrastructure Law") into law. The legislation reauthorizes surface transportation programs for FY 2022-2026 and provides advance appropriations for certain programs. The Bipartisan Infrastructure Law authorizes up to $108 billion to

support federal public transportation programs, including $91 billion in guaranteed funding.

This State Management Plan documents how the MDOT MTA administers the Section 5339 program for the rural and small urbanized areas in Maryland, as well as for the Aberdeen--Bel Air South--Bel Air North large UZA and Cecil County's portion of the Philadelphia, PA-NJ-DE-MD large UZA. It reflects the program requirements and characteristics under MAP-21, based on the legislation and currently available guidance from FTA, including FTA Circular 5100.1, "Bus and Bus Facilities formula Program: Guidance and Application Instructions," published May 18, 2015. Effective November 1, 2024, FTA consolidated guidance for the rural area component of the Grants for Buses and Bus Facilities Program under 49 U.S.C. 5339(a) (Circular 5100.1) with FTA Circular 9040.1H "Rural Areas Formula Grant Programs Guidance." and consolidated guidance for the urban component of Grants for Buses and Bus Facilities Program under 49 U.S.C. 5339(a) (Circular 5100.1) with FTA Circular 9050.1A "Urbanized Areas Formula Grant Programs Guidance."

II. Program Goals and Objectives

The national purpose of the Section 5339 program is to finance capital bus and bus-related projects that will support the continuation and expansion of public transportation services in the United States.

MTA's goals for awarding Section 5339 program funds in Maryland are to supplement the Section 5307 and 5311 programs and provide funding for vehicles and bus-related projects (such as shelters) needed to operate public transportation services in each county and the UZAs in Maryland.

III. Roles and Responsibilities

The MTA is the agency designated by the Governor to administer the Section 5339 Program. Specifically, it is the responsibility of the MTA's Office of Local Transit Support (MTA/OLTS) to carry out the effective implementation of the program. MTA/OLTS staff provides technical and financial assistance to the Locally Operated Transit Systems (LOTS) serving each of Maryland's 23 counties plus several towns and cities. MTA/OLTS staff is responsible for intergovernmental relations with the LOTS, planning, capital programming, training, regulation and policy compliance, financial management and monitoring, and public relations on behalf of the MTA in the local communities. The MTA is responsible for the data collection and compilation from each Section 5339 subrecipient in the State serving the general public. MTA/OLTS leads efforts to

coordinate the funding and delivery of specialized transportation services at the State and local level.

While this State Management Plan addresses the FTA requirement to document Section 5339 program management in Maryland, due to the myriad of responsibilities associated with the Section 5339 Program, the MTA/OLTS provides additional comprehensive guidance to its staff through standard operating procedures, and to its subrecipients through a Locally Operated Transit Systems (LOTS) Manual as well as the annual grant application package (the Annual Transportation Plan).

The MTA/OLTS coordinates with several other offices within MTA and MDOT that have roles in program implementation. Specific program functions that are shared with other offices: the Office of Planning, the Office of Finance, the Office of Procurement, the Equal Opportunity Compliance Program (EOCP), the Office of Engineering, and the Office of Human Resources.

1. The Office of Planning (Capital Programming), the Office of Finance, and MTA/OLTS are jointly responsible for the financial elements of grants management - administration of FTA grant funds under the Section 5339 Program. In general, MTA/OLTS is responsible for most of the administrative functions required for MTA to manage the subgrants with the local subrecipients (including the public transportation providers, private non-profit agencies, and local governments), while the Capital Programming Division is primarily responsible for grant management activities between MTA and FTA (including the administration of all grants for MTA-operated or contracted services). Capital Programming staff tracks the reimbursement requests against the estimated milestone/timeline information provided by the subrecipients in their annual grant applications, signs letters attesting to the availability of funds for State procurements of Section 5339 Program-funded vehicles and vehicle-related equipment, processes Section 5339 Program-funded payments once MTA/OLTS Regional Planners approve an invoice or request for reimbursement, reconcile each grant by line item on a quarterly basis, and prepares the annual and quarterly, if needed, Milestone Progress Reports (MPRs). The Office of Finance is responsible for Financial Status Reports (FSRs) for each Federal grant, and submits these reports to FTA. They track the financial payments through the State's and Federal government's systems.

2. The Equal Opportunity Compliance Program (EOCP) is responsible for civil rights programs compliance - MTA's EOCP reviews subrecipient Title VI, DBE and EEO programs for compliance with Federal and State requirements, and submits these documents to FTA on behalf of those subrecipients meeting Federal thresholds for FTA program submissions. The Equal Opportunity

Compliance Program also submits Title VI, DBE and EEO programs and reports required for the State as the grantee.

3. MDOT is responsible for public outreach on the Program of Projects (POP) - Every fall, the Maryland Secretary of Transportation and MDOT representatives physically visit each County and Baltimore City to distribute and present Maryland's Draft Consolidated Transportation Plan (CTP) in public meetings, a process known as the MDOT/CTP Tours. The CTP is an annual plan that also serves as Maryland's statewide POP for FTA funding. During the tours, members of the public and political subdivisions in Maryland provide comments on the plan and program, as well as input on local priorities. MTA/OLTS staff play a key role in supporting the tours, including documentation of and response to public comments.

4. The Programming Division, MDOT, and the OLTS work together in the development of and amendments to the Statewide Transportation Improvement Program (STIP) - Maryland's STIP is the collection of the CTP along with the regional Transportation Improvement Programs (TIPs) from each metropolitan planning organization (MPO).

5. The Office of Procurement is responsible for procuring small buses and other large quantity items granted to subrecipients on a statewide basis.

6. The Office of Planning's Environmental Division and Project Development Division provide technical assistance in planning and environmental work related to large scale capital facilities projects.

7. The Office of Engineering provides technical assistance and assists with construction oversight on an as needed basis for large scale construction projects being undertaken by subrecipients.

8. The Office of Human Resources is responsible for oversight of subrecipients' drug and alcohol programs, reporting, and compliance.

IV. Coordination

The Annual Transportation Plan (ATP), which serves as the subrecipient application for Section 5339 as well as other FTA and State funding for public transportation funding, encourages coordination of programs and services. Applicants must submit substantial narrative description on how funds will be used in a coordinated manner. The ATP itself is a consolidated subrecipient application for funding under FTA Sections 5311 (Formula

Grants for Rural Areas), 5307 (Urbanized Area Formula Funding for small urban areas), 5339 (Bus and Bus Facilities), and 5303/5304/5305 (Planning and technical assistance projects), as well as several State funding programs.

Consistent with the Federal requirement for maximum feasible coordination of public transportation service assisted under Section 5339 with transportation assisted by other Federal sources, MTA/OLTS requires that Federal and State public transportation funds be used in transportation projects that encourage the use of funds through the coordination of programs and services. The ATP includes information on other transportation services operated by the Section 5339 subrecipient and related funding and equipment, including services funded by human service programs (e.g. Office on Aging, Developmental Disabilities, Medical Assistance, etc.). In addition, each local applicant is required to examine opportunities for coordination at the project level and must contact existing area transportation providers as a part of development of the ATP.

Funding for public transportation in Maryland is also coordinated at the State and regional levels with human service transportation funding. This is facilitated through the State Coordinating Committee for Human Services Transportation (SCCHST), and through the Regional Coordinated Planning Committees in each of five regions. The Regional Coordinated Planning Committees are charged with updating the Regional Coordinated Transportation Plans at least every three years. The state-level Maryland Coordinated Public Transit-Human Services Transportation Plan is updated every four years by the MTA/OLTS working in conjunction with the SCCHST and a State Coordinated Planning Committee that includes representatives from each of the five regional planning efforts.

V. Eligible Subrecipients

Eligible recipients under Section 5339 are designated recipients and states that allocate funds to fixed route bus operators or state or local government agencies that operate fixed route bus service. It should be noted that, although Section 5339 subrecipients must operate fixed route service, vehicles/equipment purchased with Section 5339 are not limited to use in fixed route service.

MTA is the direct applicant for Section 5339 funds in Maryland, as both the state grant administrator and the transit system serving the Baltimore large urbanized area.

Eligible subrecipient applicants for the small UZA and rural area Section 5339 funds in Maryland include counties, municipalities and public agencies, as well as non-profits public corporations, boards, and commissions established under State law. When an entity other than a county applies for Section 5339 funds for the first time, the application

must be submitted by the county in which the entity is located. Section 5339-funded programs must provide transportation for the general public.

The eligible subrecipient applicant for the Aberdeen—Bel Air South—Bel Air North large UZA apportionment is Harford County government. The eligible subrecipient applicant for Cecil County's portion of the Philadelphia, PA-NJ-DE-MD large UZA apportionment is Cecil County government.

Any applicant for Section 5339 funding must be authorized by their governing body to apply for Section 5339 funds, and, in the case of private entities, must hold the appropriate federal and state operating authority.

The subrecipients may be engaged in providing transportation to specific population groups, as well as to the general public, and may also operate more than one mode of transportation. Subrecipients may also make arrangements with one or several subrecipients. However, each Section 5339 subrecipient must provide fixed route public transportation. All arrangements with subrecipients of Section 5339 funds other than the eligible applicant to MTA/OLTS must be in written form.

In some cases, Maryland may choose to grant Section 5339 assistance to a subrecipient through an intermediary subrecipient. For example, for public policy reasons, Maryland might pass funds to a public corporation through a local public body. The arrangement between the first tier and second tier subrecipient is not a third party contract if the ultimate subrecipient would otherwise be eligible under Section 5339 to receive funds directly from the State and the ultimate subrecipient intends to use those funds to pursue its own public transit project.

VI. Eligible Projects

Although eligible subrecipients must operate fixed route bus service, project funding is not limited to fixed route services. Eligible capital projects under Maryland's Section 5339 program include, but are not limited to:

- Buses, maintenance, service, and/or paratransit vehicles (including ADA vehicles),
- Radios or other communications equipment,
- Bus stop signs, benches, or shelters,
- Wheelchair lifts and related vehicle modifications,
- Vehicle rehabilitation where candidate vehicles meet the extended useful life and rehabilitation cost limits established by the MTA/OLTS,

- Spare parts, maintenance and other miscellaneous equipment with a unit cost over $1,000 and a useful life of more than one 1 year, and/or,
- Low or No Emissions equipment and facility upgrades and rehabilitations.

Because the need for vehicle replacement funding far exceeds the available funding, MTA limits use of the small urban and rural Section 5339 funds to bus and bus-related equipment only, awarded in coordination with Section 5307 and 5311 program funds.

VII. Local Share and Local Funding Requirements

A. Local Match Ratio

The financing of Section 5339 capital assistance is:

Federal:	Up to 80 percent of the project cost
State Share:	Up to 10 percent of the project cost
Local Share:	A minimum of 10 percent of the project cost

B. Source of Local Match

The local share includes all local funds contributed to meet project costs. The local share for Section 5339 must be provided for in cash. Cash may include local appropriations or cash derived from other sources.

All local contributions are accepted as part of the local subrecipient's matching share when such contributions meet all of the following criteria:

- Are verifiable from the provider's records;
- Are not included as contributions for any other Federally assisted program;
- Are not paid by the Federal government under another assistance agreement unless authorized under the other subject; and
- Are provided for in the approved budget when required by the funding agency.

In most years, Maryland contributes State funding toward the rural local match requirement, thus reducing the local match required from the subrecipients.

VIII. Project Selection Criteria and Method of Distributing Funds

With the exception of the apportionment for the Aberdeen—Bel Air South—Bel Air North large UZA and the Cecil County portion of the Philadelphia, PA-NJ-DE-MD large UZA, Section 5339 capital projects are funded on a discretionary basis according to necessity; therefore, each local applicant must provide a justification for their requested capital projects. The priorities for funding capital assistance are: 1) replacement vehicles, which must meet the service life guidelines that are included in this State Management Plan under XIII.E.3; 2) vehicles required for ADA compliance; 4) other transit capital projects necessary for the operation of public transit services, such as shelters, parts, radios, or miscellaneous maintenance equipment; and 5) vehicles for expanded service.

For the Aberdeen—Bel Air South—Bel Air North large UZA and Cecil County portion of the Philadelphia, PA-NJ-DE-MD large UZA, FTA apportions the amount of Section 5339 funds. However, the subrecipient county must still complete an annual ATP application with justification to MTA.

Capital project funding is awarded and administered in accordance with FTA Circular 4220.1G, and the MTA/OLTS's or the local jurisdiction's competitive procurement procedures after they have gone through the ATP annual review process and have been recommended for the Annual Program of Projects. The ATP annual review process consists of a statewide review of capital needs. Projects are selected based on funding availability, safety, risks, and demonstrated need.

All capital grant applicants must provide an adequate opportunity for public review and comment on a capital project, and after providing notice, must hold a public hearing or opportunity for public hearing/meeting on the project if the project affects significant economic, social, or environmental interests.

IX. Annual Program of Projects Development and Approval Process

A. Subrecipient Application Process

In Maryland, the subrecipient application for the Section 5339 program is combined with other Federal and State public transit funding programs into one document known as the Annual Transportation Plan (ATP).

The funding programs applied for through the ATP currently include:

1. Section 5311 (Formula Program for Rural Areas, excluding the Intercity Bus Program, which has a separate application process);

2. Section 5307 (Urbanized Area Formula Program) for small urbanized areas;

3. Sections 5339 (Bus and Bus Facilities Formula Program);

4. Sections 5303/5304/5305 (for subrecipient planning and technical assistance projects);

5. State Americans with Disabilities Act (ADA) Program - The State of Maryland provides funds to transit systems that operate fixed routes to provide complementary paratransit service to persons with disabilities as required under the Federal ADA;

6. State Large Urban Capital and Operating Assistance - Eligibility for these funds is limited to LOTS serving the Baltimore and Washington, DC metro areas; and

7. Statewide Specialized Transportation Assistance Program (SSTAP) - The SSTAP provides State funds to local governments for general-purpose transportation of the elderly and persons with disabilities.

Each subrecipient's ATP describes the operation of the subsequent year's transportation program and includes all the Federally-mandated local assurances, as well as the documentation needed to assure the MTA/OLTS that all State and Federal requirements will be met. The most recent Annual Transportation Plan document is attached to this State Management Plan as Appendix A.

Each Fall the program announcement and ATP package for the following fiscal year's funding are distributed to all current Section 5307, 5311, and 5339 subrecipients. The entire cycle, from the initial announcement of allocations, is approximately as follows:

Program Announcement:	Fall
Application Deadline:	Winter
State Application Submission:	Early Spring
Federal Approval:	Spring

Once a Section 5339 ATP has been approved by the MTA/OLTS and the Federal funds are approved by FTA, an interagency grant agreement between the MTA and the subrecipient is executed. This agreement will contain all appropriate certifications and assurances and serve to notify the subrecipients of all FTA requirements. The MTA/OLTS will maintain

files documenting the basis for all assurances it makes to the FTA. Each fiscal year, the MTA Office of Planning (Capital Programming) will electronically submit the appropriate certifications and assurances for all active grants that it expects FTA to make during that year.

The MTA/OLTS's review and approval process of ATPs includes an analysis of the transportation service plan and service performance, vehicle inventory and utilization plan, purchased vehicles, fixed asset inventory, vehicle replacement and refurbishment plans, vehicle funding requests, current and future equipment requests, maintenance contracts and schedules, private enterprise involvement, program compliance, certifications and assurances, operating budget, and the overall management of the project. Several levels of review and discussion are held prior to the final recommendations for the Annual Program of Projects.

X. Transfer of Funds

The State has the flexibility to transfer funds between small UZAs based on their own defined process. The national distribution funds may be transferred between small UZAs, large UZAs, and rural areas. Based on the project selection criteria and method of distributing funds described under section VIII of this State Management Plan, MTA/OLTS may transfer S.5339 allocations between small UZAs and rural area.

Section 5339 funds apportioned to the State may also be transferred to the Section 5307 Small Urban and 5311 Rural programs so long as the transferred funds are for projects that meet Section 5339 eligibility requirements.

Each time MTA/OLTS plans to transfer Section 5339 funds, Maryland's Governor provides notification to FTA, through a letter prepared by MTA, of the transfer for each transaction, so that FTA can accurately reflect this transfer decision in overall program budget levels and apportionment records. In addition, MTA's grant application project budget shows the amounts of transferred funds.

XI. Civil Rights

The MTA/OLTS and subrecipients must ensure that no person shall on the grounds of race, color, creed, national origin, sex, age, or disability be excluded from participating in, denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part through the Section 5339 program. This section describes how the State ensures that Section 5339 subrecipients meet the requirements of

Title VI, Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE).

MTA/OLTS coordinates with MTA's Equal Opportunity Compliance Program for implementation and oversight of the Title VI, EEO, and DBE processes and requirements. The Equal Opportunity Compliance Program has ultimate responsibility for Civil Rights programs.

A. Title VI

1. OLTS Program Management Related to Title VI

a. Statewide Transportation Planning Process

Each subrecipient develops and maintains a demographic profile of its jurisdiction that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI. This profile is submitted to MTA/OLTS.

Additionally, the MTA/OLTS staff collects demographic profiles of the jurisdictions through the statewide transportation planning process. The statewide transportation planning process is conducted as a compilation of several different existing planning processes. Each local jurisdiction that operates public transit services is required to have a Transportation Development Plan (TDP). The planning process used to develop this document specifically works to identify the needs of low-income and minority populations within each jurisdiction. Secondly, as was established under SAFETEA-LU for the Section 5310, the MTA/OLTS has completed a locally developed, coordinated public transit-human services transportation plan for each region in Maryland, with the exception of the Washington Region in which the programs are administered by the Metropolitan Washington Council of Government. These documents comprehensively look at unmet transportation needs of individuals with disabilities, older adults, and people with low incomes specifically those seeking employment and/or employment-related activities. These documents are supplemented with input and data received during other planning process such as the development of the Consolidated Transportation Plan (CTP), the Maryland Comprehensive Transportation Plan (MTP), Transportation Improvement Program (TIP), and Statewide Transportation Improvement Program (STIP). Together these documents will serve as MTA/OLTS's primary planning tools from which programming decisions and the development of the POP will be made.

b. Section 5339 Funding Distribution

Each county within the State of Maryland has a designated public transit operator, and Section 5339 capital funds are distributed to the local subrecipients based on a competitive application process in coordination with Section 5311 and 5307 funding, as described below as well as under section VIII of this State Management Plan.

Each subrecipient is required to submit an ATP to the MTA/OLTS each year. MTA/OLTS reviews each application for completeness and accuracy. MTA/OLTS staff works directly with each applicant to gain a thorough knowledge of the projects requested in the ATP. Funding recommendations are broken down into two separate categories, (1) Operating and (2) Capital (which includes Section 5339 as well as other FTA and State funding programs for public transportation). Recommendations for FTA funding to support operating costs are based on maintaining existing transportation levels of effort across the State. Maintaining existing levels of transportation service delivery has exhausted the amount of funds available each year. Recommendations for FTA funding to support capital projects in each local jurisdiction are based on the following priorities:

1. replacement vehicles, which must meet the service life guidelines that are included in this State Management Plan under XIII.E.3;
2. vehicles required for ADA compliance;
3. other transit capital projects necessary for the operation of public transit services, such as shelters, parts, radios, or miscellaneous maintenance equipment;
4. vehicles for expanded service.

Title VI requires that an equitable distribution of funds to subrecipients serving predominantly minority and low-income populations is achieved through the MTA/OLTS's on-going monitoring of each local government's compliance with Title VI requirements as they operate existing services and the planning process detailed in the section above. As demographic changes are identified in the planning processes or public input identifies deficiencies in the existing levels of service delivery relative to minority and low-income populations, the MTA/OLTS staff will work directly with the subrecipient to identify changes to their existing services to better accommodate these needs. If the subrecipients fail to make appropriate service adjustments, this dynamic will be given consideration as funding recommendations are developed.

Once a funding recommendations list has been refined, it is forwarded to the MTA Administrator for review and approval. The MTA Administrator is authorized by MDOT to make final project recommendation approvals and to submit applications to the FTA.

c. Criteria for Selecting Transit Providers to Participate in FTA Grant Programs

The MTA/OLTS will only award Section 5339 funds to local units of government for the delivery of open door general public transportation services.

2. Title VI Requirements for Subrecipients

a. For All Subrecipients

All Maryland LOTS, including Section 5339 subrecipients, are required by MTA/OLTS to:

1. Establish a written policy of non-discrimination on the basis of race, color, and national origin.

2. Designate a contact person responsible for implementation of Title VI for the transit system.

3. Establish a written process for receiving, recording, responding to, and resolving Title VI investigations, complaints, and lawsuits. This process should include notification of MTA immediately when any investigation, complaint, or lawsuit is initiated.

4. Notify the public of Title VI rights and procedures the public may follow to file a complaint.

5. Sign and submit the certifications and assurances with the ATP.

6. Report to MTA immediately any Title VI complaints received, or investigations or lawsuits initiated, as well as annually as part of the ATP certification and assurances.

7. Develop a Limited English Proficiency (LEP) Plan, a written plan for providing access to meaningful activities and programs for persons with LEP.

8. Develop a public participation plan and undertake steps to ensure that minority persons and LEP persons have meaningful access to these activities.

9. Compile a written Title VI Policy and Program that includes the above items and must be submitted to the MTA Office of Fair Practices for review at least every three years.

b. For Subrecipients Which Operate Fixed Route Services

All LOTS which operate fixed route service are required to establish the following system-wide standards and policies in accordance with FTA Circular 4702.1B:

1. Quantitative system-wide service standards for vehicle load, vehicle headway, on-time performance, and service availability; and

2. System-wide service policies for distribution of transit amenities and vehicle assignment.

c. For Subrecipients Which Operate 50 or More Fixed Route Buses in Peak Service and Are Located in UZAs of 200,000 or More Population

All LOTS which operate 50 or more fixed route buses in peak service and are located in UZAs of 200,000 or more population, or have been placed in this category at the discretion of the FTA Director of Civil Rights in consultation with the FTA Administrator, have the following additional requirements in accordance with FTA Circular 4702.1B:

1. A demographic analysis of the transit provider's service area. This shall include demographic maps and charts completed since submission of the last Title VI Program (if applicable) that contains demographic information and service profiles;
2. Data regarding customer demographics and travel patterns, collected from passenger surveys;
3. Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official(s)'s consideration, awareness, and approval of the monitoring results;
4. A description of the public engagement process for setting the "major service change policy" and disparate impact policy;
5. A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the major service change policy and disparate impact policy.
6. Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission; and
7. A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the equity analysis for any service or fare changes required by FTA Circular 4702.1B.

3. Monitoring Subrecipients

Subrecipients are required to provide detailed Title VI information to MTA on usage and performance of the project. The Title VI Investigations, Complaints & Lawsuit Log which

is used to provide this detailed information is submitted to the MTA/OLTS support staff along with an operating Request for Payment form quarterly. These quarterly reports will include financial and program measures updates.

The MTA/OLTS ensures that subrecipients maintain and demonstrate compliance with Title VI requirements through the following activities.

a. Annual Submittals

All subrecipients are required to sign an assurance document which is compliant with 49 CFR Section 21.7(a) and submit it to the MTA with their annual funding application. MTA/OLTS staff reviews this documentation for completeness and accuracy.

Any subrecipient who is applying for and or receiving funding for the first time is required to submit to the MTA/OLTS information regarding their Title VI compliance history if they have previously received funding from another Federal agency. This must include a copy of any Title VI compliance review activities conducted in the last three years, including the purpose or reason for the review, the name of the agency or organization that performed the review, a summary of the findings and recommendations of the review, and a report on the status and/or disposition of such findings and recommendations. This information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part. This submittal shall be made to the MTA/OLTS prior to any funding being awarded. MTA/OLTS staff reviews this documentation for completeness and accuracy. Any concerns identified as part of this review will be investigated fully prior to the awarding of FTA funds.

Each year, all Section 5307, 5311, and 5339 subrecipients are required to submit a funding application, the ATP. MTA/OLTS staff conducts a thorough and extensive review of each funding application. This review includes validating that all required documents are submitted and completed properly. This review also includes a subjective analysis of the project scope and the applicant's adherence to FTA requirements (Title VI requirements are part of this analysis). Applicants are also asked to submit printed and website material such as schedules, brochures, and other public outreach material including LEP documents as part of their application. This material is reviewed by MTA/OLTS staff for Title VI compliance.

There are different thresholds for compliance based on population, whether or not the subrecipient operates fixed route service, and the number of fixed route vehicles operated in peak service. Each year the subrecipients are required to submit documentation which defines what thresholds they need to meet in terms of Title IV compliance.

b. Public Notification

At a minimum, each subrecipient shall produce public notice outreach to inform the public of the subrecipient's Title VI obligations, apprise members of the public of the protections against discrimination afforded to them by Title VI, notify the public that the subrecipient certifies that they are in compliance with these requirements, and explain how the public can access the subrecipient's complaint process. Documentation of this effort shall be submitted to the MTA/OLTS once a year, through the ATP process. The subrecipients make their application available for public review and comment prior to the submission of the application to the MTA/OLTS. MTA/OLTS staff reviews this documentation for completeness and accuracy.

c. Reporting of Any Title VI Concerns

Each subrecipient shall notify the MTA/OLTS in writing about any complaints, lawsuits or FTA administrative activity within 3 business days of their knowledge of these actions. If the MTA/OLTS receives such a notification, the MTA/OLTS will immediately notify the MTA Office of Fair Practices. MTA/OLTS staff will be assigned to assist in the full investigation of the issue. If necessary, MTA/OLTS staff will then provide technical assistance to the subrecipient to assist in the development of corrective actions and monitor the implementation of those corrective actions

d. Transportation Development Plan (TDP)

Subrecipients for Sections 5307, 5311, and 5339 funding are required to have a TDP. These plans are updated on a five year cycle. As part of the TDP update, a critical assessment of the subrecipient's Title VI obligations and their ability to meet these requirements is conducted. This planning effort also serves as a tool to develop current and accurate data to identify locations of clusters of minority and low-come populations. MTA/OLTS staff provides technical assistance and guidance directly to subrecipient staff as the planning update process is conducted.

e. Training

The MTA/OLTS provides subrecipients with a comprehensive program manual detailing FTA and State requirements for the LOTS. A discussion of Title VI requirements is included in this document. Additionally, the MTA/OLTS hosts periodic mandatory training sessions to present various FTA program requirements, including Title VI.

f. Site visits

MTA/OLTS staff is conducts quarterly meetings as part of MTA/OLTS's continuing and on-going technical assistance and monitoring. These meetings may be on-site or via conference call. The staff will conduct at least, one on-site visit during which the staff is

looking for visual indications of Title VI compliance. Additionally, as MTA/OLTS staff interacts with subrecipient staff, they will monitor for indications that the subrecipients have understanding of, and are adhering to, Title VI requirements.

On a revolving three to five year basis, each Section 5307, 5311 and 5339 subrecipient is scheduled to receive a comprehensive site visit and compliance review by MTA/OLTS staff. These reviews are conducted to assure all relevant FTA program regulations are being followed and implemented by our subrecipients. Title VI compliance is part of this review process. While on site staff will physically review any written policy documents and records subrecipients may have on file relevant to Title VI including LEP programs and complaint policy and procedures. Subrecipients will be charged with correcting any deficiencies identified during these audits. MTA/OLTS staff will work directly with subrecipients to provide technical assistance and ensure the corrective actions are implemented in a timely manner. The checklist used to conduct these reviews is attached as Appendix B.

B. Equal Employment Opportunity (EEO)

A formal EEO program is required of any subrecipient that both employs 100 or more transit-related employees (including temporary, full-time or part-time employees either directly employed and/or through contractors) AND request or receive State/Federal capital or operating assistance in excess of $1 million the previous Federal fiscal year or receive planning assistance in excess of $250,000 in the previous Federal fiscal year. An abbreviated EEO Program is required of any subrecipient that both employees 50-99 transit-related employees (including temporary, full-time, or part-time employees either directly and/or through contractors) AND request or receive State/Federal capital or operating assistance in excess of $1 million in previous Federal fiscal year, or request or receive planning assistance in excess of $250,000 in previous Federal fiscal year. The program requirements detail what must be included – workforce analysis, numeric goals and timetables, an assessment of past employment practices and proposed remedies for problem areas, and a monitoring and reporting system. Program updates are required every three years. MTA/OLTS monitors the status of its subrecipients toward meeting these thresholds on an annual basis.

MTA/OLTS requires that all Section 5339 subrecipients (whether or not they meet the Federal threshold for a formal EEO program) establish: a responsible party for ensuring compliance with EEO requirements; a written EEO policy statement; and an EEO complaint procedure. Employees and applications must be notified of the EEO policy and complaint procedure. Subrecipients are required to notify MTA/OLTS immediately of any EEO complaints, and submit annually through the ATP the name of the responsible party, a report on complaints and their resolution, certification that EEO requirements

are being met, and indication of whether the system has an official FTA approved program (if they meet the threshold requiring this).

In addition to the annual ATP submissions, MTA/OLTS monitors subrecipient compliance with EEO requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5311 subrecipients every three years. (See Appendix B for the LOTS Compliance Review checklist.)

The MTA Equal Opportunity Compliance Program is responsible for civil rights programs compliance. The Equal Opportunity Compliance Program reviews subrecipient EEO programs for compliance with Federal and State requirements, and submits these documents to FTA on behalf of those subrecipients meeting Federal thresholds for FTA program submissions. The Equal Opportunity Compliance Program also submits the EEO program and reports required for the State as the grantee.

C. Disadvantaged Business Enterprise (DBE)

MTA/OLTS has established an MTA/OLTS DBE Procurement Review Group (PRG). The PRG consists of MTA Procurement Officers, Project Managers and employees of the Equal Opportunity Compliance Program . PRG meetings are held bi-weekly to determine the DBE goals for MDOT MTA and subrecipients' contracts that are being offered for solicitation. Detailed MTA/OLTS standard operating procedures related to DBE program activities for the LOTS are attached as Appendix C.

1. Goal Setting

For all subrecipient projects valued $50,000 or more . Project between $25,000-$50,000 will not be reviewed by the PRG but should be considered to be solicited among Small Business Enterprises (SBE) firms only. At least one DBE or SBE must be solicited. The LOTS must submit a request for procurement to the MTA/OLTS Regional Planner identifying the capital/operating project, the estimated project cost, the anticipated DBE goal/SBE designation, the DBE goal tabulation, the method of procurement and any procurement documents such as a Request for Proposal (RFP) which contains a scope of work (SOW). The LOTS procurement specialist is required to create a subcontracting analysis which identifies the subcontracting opportunities and an independent cost estimate (ICE) for the project with assistance from the MTA/OLTS Regional Planner as needed.

The MTA/OLTS Regional Planner forwards the LOTS request and documents to MDOT MTA's Procurement Department, which sends these on to the Equal Opportunity Compliance Program for review. The Equal Opportunity Compliance Program may

adjust the LOTS' recommended DBE goals/SBE designation, in which case they will work directly with the LOTS' procurement officer to address such recommendations.

2. Solicitations

For all subrecipient projects valued $50,000 or more, the LOTS must advertise the procurement using a method of competitive procurement such as a Request for Proposal (RFP), an Invitation for Bid (IFB), etc., including the DBE project goal.

Before awarding the contract, the LOTS must send the recommended appropriate bidder's bid analysis, along with the package of MDOT DBE forms, to the Regional Planner, requesting concurrence to award the contract. Before the MTA/OLTS Regional Planner can issue concurrence, a DBE evaluation of the recommended bidder and DBE/SBE package is conducted by the Equal Opportunities Compliance Program.

Should the bidder/offeror submit a request for a waiver demonstrating they are unable to achieve the DBE participation goal or SBE designation as outlined in the procurement solicitation, such as a RFP or IFB, etc., documentation is required from the bidder/offeror showing good faith efforts to obtain the specified DBE/SBE participation goal.

3. Contract Monitoring

For projects that exceed $50,000, following MTA/OLTS concurrence letter to the LOTS to award the project with a copy being forwarded to the Equal Opportunity Compliance Program (EOCP) to serve as the official award date of the project, the EOCP will coordinate and conduct a conference call including the Regional Planner, the prime contractor, and the Subcontractor to establish reporting instructions and methodology for reporting. The prime and subcontractor will be required to submit the Monthly DBE Payment Report to the EOCP electronically as directed in the instruction given to them by EOCP by the 10th of the following month even if there is no payment activity. The payment report shall include: 1) identification of the DBE/SBE subcontractor participating on the project; 2) type of work being done by each DBE/SBE subcontractor; 3) dollar amount of project and each DBE/SBE subcontract; 4) actual monies paid during the reporting period and to date to the DBE/SBE subcontractors; 5) comments by the contractor/subcontractor. The prime and subcontractor are expected to copy the LOTs and the RP with the monthly payment information being submitted to EOCP.

The MTA/OLTS Regional Planner will work with the Equal Opportunities Compliance Program should there be any issues of non-compliance indicated on the Monthly Payment Form submissions and/or within the project engineer's records which will be reviewed during the MTA/OLTS quarterly site visits.

4. Formal DBE/SBE Program for Subrecipients Meeting FTA Threshold

All subrecipients that receive $250,000 or more in FTA planning, capital (not counting transit vehicle purchases), and/or operating assistance in a State fiscal year are required have an MTA-approved DBE/SBE program. The requirement includes:

a. A signed and dated DBE policy statement that expresses a commitment to the DBE/SBE program, states its objectives, and outlines responsibilities for its implementation. The statement must be circulated throughout the organization and to the DBE and non-DBE business communities that perform work on FTA-assisted contracts (which can be achieved by including the policy statement in all procurements involving FTA funds).

b. Establishment of an overall DBE/SBE goal for annual contract participation by disadvantaged businesses.

c. Development and maintenance of a directory of DBE-certified firms to be notified when competitive procurements are advertised. All DBE's are SBE's. This directory must include each firm's address, phone number, and the types of work the firm has been certified to perform as a DBE. Each subrecipient must revise their directory at least annually and make updated information available to contractors and the public on request. Alternately, subrecipients may use the MDOT DBE directory rather than creating their own individual directories.

d. Public participation that includes:

- Consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations that could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and a grantee's efforts to establish participation of DBEs.

- A published notice announcing proposed overall goals, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the principal office for 30 days following the date of the notice, and informing the public that comments on the goals will be accepted for 45 days from the date of the notice. The notice must include addresses to which comments may be sent. The notice must be published in general circulation media and be available in minority-focused media and trade association publications.

XII. Section 504 and ADA Reporting

All Section 5339 subrecipients are required to comply with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, and assure that no individual is discriminated against on the basis of disability in connection with the provision of transportation service.

MTA/OLTS requires subrecipients to submit procurement documents to MTA/OLTS for concurrence before initiating the procurement. As part of procurement oversight, MTA/OLTS verifies that all fixed-route vehicle specifications require ADA accessibility. Non-accessible demand-response vehicles are only permitted to be purchased when the demand-response system, when viewed in its entirety, provides an equivalent level of service for persons using wheelchairs as for ambulatory persons. Subrecipients are required to submit a Certification of Equivalent Service for annual grant requests for demand-responsive vehicles that are not accessible to persons using wheelchairs, and reviews the makeup and utilization of the applicant's entire revenue vehicle fleet as part of the application.

MTA/OLTS requires every subrecipient providing fixed-route service (with the exception of commuter bus and intercity bus) to provide ADA-compliant complementary paratransit service. This service must meet the specific Federally established vehicle and service requirements, and provide an equivalent level of service as the fixed-route service it is intended to complement. For systems that operate route deviation service:

- If deviations are available to all members of the public (not just persons with disabilities), the service is considered "Demand Response" and the system does not need to operate ADA complementary paratransit services.

- If deviations are only available for persons with disabilities, the LOTS must offer separate complementary paratransit as well.

Jurisdictions that provide ADA complementary paratransit service are required to have an approved ADA plan. ADA audits are performed on these jurisdictions periodically to ensure compliance. ADA plans are updated/revised based on recommendations from audits and due to changes in FTA regulations.

MTA/OLTS provides technical assistance to subrecipients on all aspects of ensuring transportation services are accessible to people with disabilities and compliance with the ADA. The Maryland LOTS Program Manual includes a 24-page chapter, and also addresses accessibility considerations in other chapters with regards to planning, public participation, facility development, maintenance, and emergency preparedness.

Subrecipient training funded by the Maryland RTAP program also frequently addresses aspects of ADA compliance. MTA/OLTS provides subrecipients with sample ADA-related policies and procedures for fixed route and demand-response services (Appendices D and E), and related guidance for route deviation services (Appendix F).

MTA/OLTS monitors subrecipient compliance with ADA requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5339 subrecipients every three years. (See Appendix B for the LOTS Compliance Review checklist. ADA requirements are addressed in the Service Requirements/Restrictions section.) As part of this review, the reviewer looks at the subrecipient's website and printed materials to ensure that ADA-compliant service policies are in effect.

MTA/OLTS also inspects maintenance records of accessibility equipment as part of periodic maintenance review of each subrecipient.

XIII. Program Management

A. Procurement

Except for revenue vehicles, all procurement activities are the responsibility of the local Section 5339 subrecipient. Revenue vehicles may be procured by the local Section 5339 subrecipient or by the State for the local subrecipient. Local subrecipients use the procurement procedures of their jurisdiction as long as they conform to the minimum standards prescribed by the MTA/OLTS and in FTA Circular 4220.1G. In addition, the local subrecipient must maintain a contract administration system that ensures that all procurements funded wholly or in part with Section 5339 funds are done in accordance with the MTA/OLTS and Federal regulations.

The MTA/OLTS has adopted the procurement requirements and standards delineated in FTA Circular 4220.1G for the Section 5339 subrecipients in Maryland with the following exception: the State small purchase threshold is $50,000. For projects over $50,000, the subrecipient must pursue the same methods of procurement that are followed for FTA-funded projects that are $100,000 or more as described in Circular 4220.1G.

For projects up to $50,000 (State limit equivalent to FTA's threshold of $100,000), the subrecipient must solicit price or rate quotations from an adequate number of sources; the State requires at least two and preferably three quotes.

The State categorizes small procurements as follows, each with its own procurement guidelines:

1. ***Category I (known as Micro-purchases under Federal methods):*** For purchases valued up to $5,000 for operating and $1,000 for capital, oral or written solicitation may be used. A written purchase order or contract is required if written solicitation is used. The subrecipient is responsible for ensuring that the price is fair and reasonable, and is encouraged to distribute multiple purchases equitably among local qualified suppliers. The basis for the award should be the judgment of the subrecipient's procurement officer. Once a subrecipient has identified a preferred vendor, MTA/OLTS concurrence is required prior to the issuance of a purchase order.

2. ***Category II:*** for procurements more than $5,000 for operating and more than $1,000 for capital but not more than $15,000, oral or written solicitation may be made. A written purchase order or contract is required for Category II small procurements.

3. ***Category III:*** for procurements more than $15,000 but not more than $50,000, written solicitation must be made (although it may be supplemented by oral solicitation), and the solicitation must be posted on the eMaryland Marketplace.

All of these categories require an Independent Cost Estimate (ICE).

MTA/OLTS ensures subrecipient compliance with procurement requirements by requiring that subrecipients consult with their MTA/OLTS Regional Planner for any FTA- and/or MTA-funded purchases exceeding $1,000 for purchases funded by capital grants, and $5,000 for purchases funded by operating grants. The MTA/OLTS must concur with subrecipient solicitation documents prior to the initiation of the procurement process for all items or services purchased with capital and technical assistance funds, as well as for all items purchased through small purchase, sealed bids, competitive proposal, competitive negotiation, or noncompetitive negotiation. This includes approval of bid specifications for vehicles and equipment.

The MTA/OLTS must also concur in writing with the recommendation for award prior to the execution of a local contract or purchase order for all items purchased through the methods mentioned previously. The MTA/OLTS will defer to the local subrecipient's procurement requirements if the subrecipient's requirements are more stringent than the State's requirements.

MTA/OLTS provides periodic training to all subrecipients on procurement requirements. MTA/OLTS monitors subrecipient compliance with procurement requirements as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5339 subrecipients every three to five years. As part of this review, documentation within the subrecipient's procurement files is examined.

MTA conducts centralized vehicle procurements of vans and small- and medium-sized buses on behalf of the LOTS systems, and Section 5339 subrecipients are strongly encouraged to take advantage of MTA's bus procurement when available for their project. Section 5339 subrecipients may conduct their own bus procurements subject to MTA review and approval.

B. Financial Management, Accounting, and Auditing

The MTA/OLTS provides for fiscal controls and accounting procedures in accordance with State laws and in compliance with all FTA requirements.

Information received from subrecipients will provide detailed information on expenditures and services provided in support of projects for payment for Section 5339 funds. The grant agreements held with subrecipients require that all funds be expended and accounted for as required by Federal, State, and local law. Audits are required in accordance with the provisions of 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Subpart F, and received annually from each subrecipient. This information, as well as records held by the subrecipient, provide documentation for State and Federal review.

C. Project Closeout

MTA/OLTS closes out Section 5339 projects through a two-phase process:

1. The MTA closes out the project with the subrecipient. MTA/OLTS initiates subrecipient grant closeout after the capital item(s) (for which the grant was awarded) are procured, the subrecipient has submitted all final requests for payment and supporting information to the MTA, and MTA has reimbursed the subrecipient for the capital expense. At this point, any remaining funds in the subrecipient grant are reallocated to other eligible subrecipient projects.

2. After all subrecipient projects under the FTA grant are closed out, the MTA closes out the grant with FTA.

D. Property Management

FTA defines equipment as all tangible, nonexpendable, personal property that has a service life of more than one year and an acquisition cost that exceeds $10,000 per unit.

Maryland Section 5339 subrecipients are required to maintain the following records on all MTA-funded vehicles and other equipment with a unit cost of $15,000 (or less if integral to the operation of the transportation service) :

- A description of the equipment,
- A serial number or other identification number,
- Who holds the title,
- The acquisition date,
- The cost of the equipment,
- Percentage of Federal/State participation in the cost of the equipment,
- MTA grant or project number under which it was procured,
- FTA grant agreement number under which it was procured,
- the location, use, and condition of the equipment,
- useful life; and
- any disposition date, including the date of disposal and sale price of the equipment.

The title (if applicable) to all equipment must be vested in the name of the local subrecipient.

In accordance with FTA Circular 5010.1 F, MTA/OLTS requires that subrecipients conduct a physical inventory of equipment and reconcile the results with the property records at least once every two years.

As part of the Annual Transportation Plan (annual grant application), subrecipients are required to submit a current Vehicle Inventory Form as well as a Fixed Assets Inventory Form for equipment and facilities purchased in whole or in part with the MTA and FTA funds.

- The Vehicle Inventory form requires the following information: route type, agency asset id number, vehicle identification number (VIN), current status, model year, make, model, vehicle type, length, seating capacity, wheelchair capacity, standing capacity, fuel type, delivered price, MTA grant number or other source, funding ratio (federal/state/local), in service date, current physical condition, current mileage, minimum useful life (miles/years), expected useful life remaining (miles/years), earliest possible replacement year, owner, supports other mode, date of MTA approval to dispose, date of disposal, replacement vehicle. A second form requires utilization details (location, days and hours of use).

  The Fixed Assets Inventory form requires the following information: agency asset id, site name, address, building id, department (ops/admin./main.) asset

category, asset type, description, funding ratio (fed/state/local), transit agency capital responsibility, in-service date, renovation date, minimum useful life (years), estimated useful life remaining (years), earliest possible replacement date, owner, percent used for transit, date of MTA approval for retirement/disposal.

The Annual Transportation Plan also contains the FTA Certifications and Assurances requiring the applicant to have satisfactory continuing control over the use of project equipment and facilities. As part of their review of the Annual Transportation Plan, the MTA/OLTS staff will analyze 1) the previous awards made and 2) whether the capital still holds value to warrant listing. The MTA/OLTS staff will validate presence and condition of equipment during annual site visits.

Every agency must develop a transit asset management (TAM) plan if it owns, operates, or manages capital assets used to provide public transportation and receives federal financial assistance under 49 U.S.C. Chapter 53 as a recipient or subrecipient. Each transit provider must designate an Accountable Executive (49 CFR 625.5) to ensure appropriate resources for implementing the agency's TAM plan and the Transit Agency Safety Plan.

Each TAM plan should:

Outline how people, processes, and tools come together to address asset management policy and goals
Provide accountability and visibility for furthering understanding of leveraging asset management practices
Support planning, budgeting, and communications to internal and external stakeholders.

Each subrecipient must participate in the development of a Transportation Asset Management Plan (TAMP). The plan documents all capital assets, analyzes useful life, and sets target goals for maintaining a state of good repair. Tier I subrecipients participant in a joint TAMP plan; Tier 1 agencies must develop a TAMP specific to their agency. Quadrennial updates are completed on the TAMP, with annual asset updates and goal setting.

A control system must be developed by each subrecipient to ensure adequate safeguards to prevent the loss, damage, or theft of equipment. Any loss, damage, or theft shall be investigated. Adequate maintenance procedures must be developed to keep the property in good condition, as described in section XIII.E.2 of this SMP. In cases of accidental or casual loss of project equipment, fair market value shall be deemed as the value of the equipment prior to its destruction. The local subrecipient must reinvest the insurance proceeds from the settlement for public transit purposes. FTA useful life requirements apply. If the asset has not reached its useful life, the appropriate payment should be

made to replace the asset. Otherwise, documentation should be provided supporting the application of proceeds to the transit operation.

E. Vehicle Use, Maintenance and Disposition

1. Vehicle Use and Satisfactory Continuing Control

Capital management is an important aspect of public transit since it affects the safety, marketability, and financial integrity of the transit system. Transit is dependent on its capital equipment to accomplish its mission. Subrecipients of federal dollars administered by the MTA/OLTS are required to certify that any property purchased with those funds is used for public transportation services within the subrecipient's service area or other area described in the grant application for the useful life of the equipment or facility. Additionally, the subrecipient must annually certify that it has or will have satisfactory continuing control over the use of the equipment and facilities through operation or lease or otherwise.

All property acquired using federal funds must be utilized and disposed of in accordance with the applicable FTA program circular, FTA Circular 5010.1 F (as amended) and 49 CFR 18 or 49 CFR 19. Title to all property purchased with Section 5339 funds must be vested in the name of the subrecipient.

Subrecipients are required to maintain the property at a high level of cleanliness, safety, and mechanical soundness. Each subrecipient must establish a maintenance program that, at a minimum, meets the equipment manufacturer's recommendations. MTA/OLTS has the right, and obligation, to review the transit system's maintenance and safety programs and to conduct periodic audits of equipment and facilities funded with state and federal funds administered by MTA/OLTS.

The subrecipient must have the requisite fiscal capability to carry out the project and is responsible for maintaining required insurance coverage, property records, conducting physical inventories, implementing adequate property control systems and maintaining the equipment in proper working condition. Documentation must be available upon request.

Subrecipients must maintain control over Federally funded property; ensure that it is used in transit service, and dispose of it in accordance with Federal requirements. If the subrecipient leases Federally funded property to another party, the lease must provide that the subrecipient satisfactorily provides continuing control over the use of that property. Control over FTA-funded facilities and equipment is determined in two areas: real property (land) and facilities; and personal property (equipment and rolling stock, both revenue and non-revenue).

Subrecipients are prohibited from using FTA-funded vehicles to provide charter service or exclusive school transportation, as detailed under sections XIX.D and XIX. E of this State Management Plan.

2. Vehicle Maintenance

All Section 5339 subrecipients must have a written maintenance plan, and must establish a preventive maintenance (PM) program. Inspection and servicing of ADA-mandated accessibility equipment is required to be part of the PM program, including cycling the lift as part of the pre-trip inspection. Subrecipients are required to adhere to the frequencies and PM schedule identified in their plan. MTA/OLTS monitors and measures adherence to this schedule as part of the comprehensive compliance review that MTA/OLTS conducts with each of its Section 5339 subrecipients every three years. (See Appendix B for the LOTS Compliance Review checklist.) Current MTA/OLTS standards allow for a 10% deviation from the schedule and at least 80% of scheduled services need to be within the 10% window. Grantees are also subject to quarterly PM reviews (see Appendix G for the Quarterly PM Check form) and random maintenance record checks.

Additionally, Section 5339 subrecipients must comply with the Maryland Preventive Maintenance Program requirements detailed under COMAR Title 11: Department of Transportation, Subtitle 22: Preventive Maintenance Program. This requirement applies to any bus designed and used to carry more than ten people owned by the State of Maryland or any political subdivision, excluding those subject to school bus regulations, as well as vehicles with a seating capacity for 16 or more passengers including the driver (as well as other types of commercial vehicles) owned by other types of organizations. Each vehicle must carry a certification documenting that preventive maintenance and inspections are performed and in compliance with State Preventive Maintenance Program requirements. MTA/OLTS checks annually for preventive maintenance certification as part of the ATP.

3. Minimum Useful Life Standards

To ensure that vehicles are adequately maintained and remain in service for their normal service life, the MTA/OLTS has established minimum useful life standards for vehicles funded with state or federal funds. These standards apply to all vehicles purchased with Sections 5307, /5339, 5310, 5311, and State funds, and to all vehicles that will be replaced with vehicles funded from these programs, regardless of the initial funding source.

Classification	Yrs.	Miles	GVWR	LENGTH
Revenue Specialized Vehicles (Accessible Minivans, Vans, Accessible Taxicabs & Sedans)	4 years	100,000	< 14,000 lbs.	n/a
Light Duty Bus	5 years	150,000	15,000 lbs. or less	25' - 35'
Medium Duty Bus	7 years	200,000	All.	25' - 35'
Heavy Duty Bus-Medium Size	10 years	350,000	All	30' – 35' '
Heavy Duty Bus-Large Size	12 years	500,000	All	Over 35'
Non-Revenue Specialized/ Fleet Support Vehicles (Pick-Up Trucks, Utility Vehicles & Sedans)	10 years	200,000	All	n/a

To classify a vehicle, both the gross vehicle weight ratio (GVWR) and the length of the vehicle must be met. Useful life for trolley-buses (simulated, with rubber tires and internal combustion engines) is determined using the above useful life classifications. If there is ever a question about what a certain vehicle's classification might be, the Altoona Test used for that vehicle is always the substantiating documentation as to its classification.

Service-life begins on the date the vehicle was placed in service and continues until it is removed from service.

Vehicles are not replaced based solely on age or accumulated mileage. Subrecipients are required to submit additional information about the condition of the vehicle for all replacement requests, such as repair records or estimated repair costs.

Below is minimum information that is requested to submit for a replacement vehicle, using forms provided in the annual grant application.

- Fleet Vehicle Number,
- Present Mileage,
- Vehicle Identification Number and delivery date (if the vehicle to be replaced was purchased under a previous Section 5307, /5339, 5310, 5311, or State grant),
- A description of the condition of the vehicle to be replaced, including the reasons for replacing the vehicle at this time; and
- An indication of how the vehicle will be disposed of (sell, salvage, or used as backup or other).

Any insurance proceeds received for a vehicle are deducted from MTA's state and federal portion of the eligible cost of a replacement vehicle.

4. Replacement Prior to Meeting Minimum Useful Life Criteria

The MTA/OLTS considers the value prior to the end of normal useful-life to be based on straight line depreciation and that removal of an MTA/OLTS funded vehicle before the end of its normal service life, for any reason, requires notification to the MTA/OLTS. The subrecipient must describe the circumstances necessitating the replacement of the vehicle. The subrecipient would need to complete the information above, in addition to providing the following information:

1. A list of any repairs that will be required to keep the vehicle in service, and an estimated cost of each repair.
2. A description and cost of repairs made to the vehicle to date (attach the repair and preventive maintenance records, if available).

Upon notification, the MTA/OLTS will determine whether it retains further interest in the vehicle and whether reimbursement of the federal/state share of its remaining value must take place. For FTA/MTA-funded vehicles, after the normal service life is met, the MTA/OLTS no longer retains a financial interest in the vehicle. FTA/MTA approval is required prior to disposal of FTA/MTA-funded vehicles with remaining FTA financial interest.

5. Disposition

The subrecipient may dispose of vehicles and other equipment at the end of their useful life after notifying and receiving disposition instructions from the MTA/OLTS. The subrecipient must follow its locally adopted process and must obtain a minimum of two appraisals in writing by qualified individuals to determine the fair market value of the equipment to be sold and concurrence must be received from the MTA/OLTS. Proceeds from the sale of the vehicle should be added to the subrecipient's transportation budget and utilized for transit capital projects, and must not be considered local match in any future request for payment. MTA/OLTS has established accounting requirements regarding grant-funded vehicle sales proceeds, to ensure that there is a paper trail demonstrating that such revenues are not used as local match or for operating expenses (attached as Appendix I).

The first $100 of the proceeds can be retained to cover administrative expenses incurred. The MTA/OLTS requests that upon completion of the sale, the subrecipient provide the sales receipt information and indicate on what capital item(s) they intend to spend the auction proceeds.

If the original purchase price was $1,000 or more, MTA/OLTS may request that the subrecipient remit back to MTA a proportional amount of the sale based upon the

original grant ratio, deducting from this amount if necessary to ensure that the subrecipient retains at least $100 from the proceeds to cover handling expenses.

For any sale which results in proceeds over $5,000, requires reimbursement to the FTA of the proportionate share of the fair market value or the net proceeds of the sale.

F. Management and Financial Reviews

1. Subrecipient Technical Capacity

The subrecipient must be able to implement the projects included in the grant application and grant agreement using sound management practices. The subrecipient must have adequate procedures in place to manage the grants including procedures to submit timely, complete reports to the MTA/OLTS, close out grants in a timely manner, and effectively manage and deliver transit services.

As part of the annual grant application as well as the MTA/OLTS Triennial Reviews of subrecipients, described in section XIX.G of this State Management Plan, each subrecipient's financial capacity is reviewed.

2. Subrecipient Financial Capacity

The subrecipient system must have the ability to match and manage grant funds, to cover operating deficits through long-term stable and reliable sources of revenue, to maintain and operate federally funded facilities and equipment, and to conduct an annual independent organization-wide audit in accordance with the provisions of Title 2 of the Code of Federal Regulations (2 CFR 200). The subrecipient is required to prepare an annual budget that incorporates future financial needs. In addition to an annual audit, if the organization uses Federal funds to cover indirect costs (e.g., an overhead rate from a parent organization), they must have an approved cost allocation plan.

As part of the annual grant application as well as the MTA/OLTS Triennial Reviews of subrecipients, described in section XIX.G of this State Management Plan, each subrecipient's financial capacity is reviewed.

G. Project Monitoring and Reviews

MTA/OLTS monitors Section 5339 projects for progress as well as compliance. MTA/OLTS's approach to subrecipient compliance monitoring is described under section

XIX.G of this State Management Plan. Progress monitoring of Section 5339 projects is achieved through the following requirements:

Subrecipients are required to submit all solicitation documents prior to the initiation of the procurement process for all items or services purchased with Section 5339 funds. This includes bid specifications for vehicles and equipment. Subrecipients are not permitted to execute a Section 5339-funded local contract or purchase order valued more than $1,000 without MTA concurrence. Funding is provided on a cost reimbursement basis. Additional MTA/OLTS monitoring related to subrecipient vehicle procurements is described under sections XIII.A and XIX.B of this State Management Plan.

Subrecipients are required to submit quarterly financial operating reports to MTA/OLTS, as described under section XIII.I of this State Management Plan.

H. Performance Standards

MTA has established the transit operating performance standards for the LOTS (subrecipients). The current standards, updated in November 2018, are found Appendix H.

These performance standards were established as a tool for monitoring subrecipient services for effectiveness and efficiency. This rating structure is used as a basis for offering technical assistance. The program is set up such that services can be rated as "Successful" or "Needs Review" based on how they perform in each of the operating measures. In addition, these standards are utilized in determining whether new services requested by the systems should be funded based on their potential for being successful.

Subrecipient performance standards are periodically updated to reflect changes in the Consumer Price Index (CPI).

I. Reporting Requirements

1. General Requirements

The MTA/OLTS is responsible for ensuring that data is collected and compiled from each Section 5339 subrecipient and transportation provider in the State that benefits from the grant. This is accomplished through quarterly operating and financial statements required from each subrecipient, as well as annual data and updated capital asset inventories submitted as part of each subrecipient's annual grant application.

2. NTD Reporting

Subrecipients and beneficiaries of Section 5339 are required by 49 U.S.C. 5335(a) and (b) to submit data to the NTD as a condition of the award, through annual reports (all subrecipients) and monthly reports (subrecipients in urbanized areas).

- Section 5339 subrecipients that are also Section 5307 subrecipients are required to submit their reports directly to the NTD in accordance with the NTD Reporting manual.

- Section 5339 subrecipients that are also Section 5311 subrecipients are required to submit annual Rural NTD reports to MTA.

J. Safety, Security, and Compliance

1. Agency Safety Plan

On July 19, 2018, FTA published the Public Transportation Agency Safety Plan (PTASP) Final Rule, and its update effective May 13,2024,which requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS).

The PTASP rule became effective on July 19, 2019.

FTA published a Notice of Enforcement Discretion on April 22, 2020 effectively extending the PTASP compliance deadline from July 20, 2020 to December 31, 2020.

FTA published a second Notice of Enforcement Discretion on December 11, 2020 effectively extending the PTASP compliance deadline to July 20, 2021.

The plan must include safety performance targets. Find additional guidance on planning and target setting on FTA's Performance-Based Planning pages.

Transit operators also must certify they have a safety plan in place meeting the requirements of the rule by July 20, 2021.

The plan must be updated and certified by the transit agency annually.

The rule applies to all operators of public transportation systems that are recipients and sub-recipients of federal financial assistance under the Urbanized

Area Formula Program (49 U.S.C. § 5307). However, FTA is deferring applicability of this requirement for operators that only receive funds through FTA's Enhanced Mobility of Seniors and Individuals with Disabilities Formula Program (Section 5310) and/or Rural Area Formula Program (Section 5311).

The rule does not apply to agencies that are subject to the safety jurisdiction of another federal agency, including passenger ferry operators regulated by the U.S. Coast Guard and rail operators regulated by the Federal Railroad Administration.

OLTS requires each of its subrecipients to develop and maintain an Agency Safety Plan in accordance with the FTA regulation. As part of quarterly reporting requirements, all subrecipients must report safety incidents and events. Annually, subrecipients must set safety goals.

XIX. Compliance with Other Federal Provisions

Describe the process by which the recipient complies with other federal requirements such as environmental protection, Buy America (see Chapter V) provisions, pre-award and post-delivery reviews, restrictions on lobbying, prohibition of exclusive school transportation, and drug and alcohol testing, including the state's procedures for monitoring compliance by subrecipients.

A. Environmental Protection

Environmental protection requirements are met whenever Section 5339 funds are used.

- Section 5339 projects must comply with the joint FHWA/FTA guidelines on protection of the environment titled "Environmental Impact and Related Procedures" (23 CFR §771).

- The regulation categorized projects in three classes according to degree of environmental impact:

    - Class I projects have a significant effect on the environment and, therefore, require the preparation of an Environmental Impact Statement (EIS).
    - Class II projects do not normally have a significant environmental impact and as such are "categorically excluded" from the requirement to prepare further environmental assessment or impact studies.
    - Class III projects are those where the significance of the environmental impact cannot readily be determined and require a brief Environmental Assessment.

A majority of the projects funded through Maryland's Section 5339 program will be classed as categorical exclusions (CEs). Larger construction projects or projects in sensitive areas may require the preparation of an environmental assessment (EA). All potential projects will be screened by the MTA Office of Planning's Environmental Division and MTA's Office of Planning's Environmental Division will make an initial determination as to which projects meet the criteria for categorical exclusions and which may require additional documentation. Since the MTA/OLTS staff maintains a close working relationship with its subrecipients, projects that do not qualify as a categorical exclusion can be identified early in project development; therefore activities can be coordinated with the FTA Regional Office so that any necessary environmental analysis and reviews will not delay implementation.

B. Buy America, Pre-Award and Post-Delivery Reviews

As part of the Annual Transportation Plan (annual grant application) certifications and assurances all Section 5339 subrecipients agree to comply with FTA's Buy America regulations, as well as Rolling Stock Reviews and Bus Testing Certifications. In addition, solicitation and contract documents for all capital procurements, as well as for any procurement conducted through sealed bids, competitive proposal and noncompetitive negotiation, must be reviewed by the MTA/OLTS for compliance with all applicable regulations.

The MTA/OLTS has provided information to all subrecipients procuring vehicles on the pre-award and post-delivery audits as well as specific language to be included in bid documents. The MTA/OLTS will not process any payments for vehicles without the pre-award and post-delivery audit certifications attached to the request for payment as well as the Transit Vehicle Manufacturer (TVM) certification of compliance with subpart D, part 26 (when applicable). Compliance will also be certified on the Annual List of Certifications and Assurances. The MTA Office of Procurement will procure vehicles on behalf of subrecipients which not only reduces the administrative burden, but also results in lower prices for higher quantity purchases.

C. Restrictions of Lobbying

FTA recipients are prohibited from using Federal financial assistance to influence any Member of Congress or an officer or employee of any agency in the connection with the making of any federal contract, grant, or cooperative agreement. MTA and Section 5339 recipients of grants exceeding $100,000 must sign a certification so stating and must disclose the expenditure of non-federal funds for such purposes (49 CFR part 20). Other

Federal laws also govern lobbying activities. For example, federal funds may not be used for lobbying Congressional representatives or senators indirectly, such as by contributing to a lobbying organization or funding a grass-roots campaign to influence legislation (31 U.S.C § 1352). General advocacy for transit and providing information to legislators about the services a recipient provides in the community are not prohibited, nor is using non-federal funds for lobbying, so long as the required disclosures are made.

Currently, subrecipients certify to MTA/OLTS through the grant agreements and the annual certifications and assurances. Specific contracts, grants or cooperative agreements are actions covered by the restrictions on lobbying. Activities such as submitting grant applications, status inquiries, and professional and technical services are not lobbying and do not need to be disclosed. Efforts to influence Federal officials about specific grants and contracts or to ask Congressional representatives for support of a particular application or bid must be disclosed. Also, lobbying restrictions do not apply to activities that might influence policy issues.

Subrecipient responsibilities:

1. Sign a certification of compliance pertaining to lobbying activities.
2. Where third party contractors are involved, subrecipients must obtain a signed certification of compliance from the contractor.
3. If non-federal funds have been used to support lobbying activities in connection with a grant from MTA, and the subrecipient receives federal grants exceeding $100,000, fill out Standard Form-LLL and submit it to MTA/OLTS.
4. If contractors received more than $100,000 in federal funds and used non-federal funds to support lobbying, subrecipients must obtain the completed Standard Form-LLL from the contractor and submit it to MTA/OLTS.

D. Prohibition of Charter Bus Service

As recipients of public transit funds, all LOTS sign a Charter Service Agreement. The agreement is contained in the Certifications and Assurances that become part of each subrecipient's Grant Agreement. In Charter Agreements, public transit grantees agree that the transit system, and each subrecipient or third-party contractors who use FTA-funded vehicles, may provide charter services using equipment of facilities acquired with federal transit assistance only in compliance with FTA charter regulations, 49 CFR Part 604: eCFR :: 49 CFR Part 604 -- Charter Service.

The purpose of the FTA Charter Service rule is to protect private bus operators from unfair competition from transit operators who have access to Federal and State funds for purchasing buses, and Federal funds for their operation.

The current FTA rules on charter bus service by public transit operators receiving federal funds became effective on April 30, 2008, and was updated in July, 2025. These regulations allow for clear exemptions up front for some services, as well as exceptions under particular circumstances. The 2008 regulations also revised the definition of charter service, allow Advisory Opinions and Cease and Desist Orders, provide a clear complaint and hearing process, and provide a mechanism for determining remedies in the event of a violation.

FTA's charter service webpage is: https://www.transit.dot.gov/regulations-and-guidance/access/charter-bus-service/charter-bus-service-regulations-0.

Subrecipients who choose to pursue a charter service provision within the confines of Federal regulations are required to do the following in addition to the other procedures outlined in the LOTS Manual.

- Subrecipient must notify MTA/OLTS in writing prior to entering into an agreement to provide charter service.

- Any revenue generated from charter bus activity must be tracked and accounted for within the confines of the non-fare revenue policy detailed in the LOTS Manual.

MTA/OLTS will review subrecipients' compliance with the charter regulation as part of its evaluation and monitoring practices described in section XIX.G of this State Management Plan.

E. Prohibition of Exclusive School Transportation

FTA subrecipients are prohibited from providing exclusive school bus service unless it qualifies under specified exceptions. In no case, however, can federally-funded equipment or facilities be used for exclusive school service. This includes transportation to or from any before-or after-school activities. The implementing regulation (49 CFR Part 605) does permit regular service to be modified to accommodate school students along with the general public. The FTA considers Headstart to be a social service program rather than a school program. Rules for the Head Start program limit the types of vehicles which may be used to transport children participating in the Headstart Program. Subrecipients may operate multi-functional vehicles that meet the safety requirements for school transportation but may not provide exclusive school service.

As part of the annual certifications and assurances, all MTA/OLTS subrecipients agree to abide by this prohibition.

F. Drug and Alcohol Testing

Section 5339 subrecipients are required to comply with FTA Drug and Alcohol Testing regulations for safety-sensitive positions. The MDOT MTA Office of Human Resources has provided all necessary information for compliance with the Drug and Alcohol Testing regulations required by 49 U.S.C. 5331, as well as technical assistance and training to properly implement the regulation. The MDOT MTA Office of Human Resources will continue to assist MTA/OLTS and use its established monitoring program to ensure that all Section 5339 subrecipients are in compliance with the regulations.

The subrecipient requirements for FTA Drug and Alcohol Testing, as detailed in the Maryland LOTS Manual, are found in Appendix J to this State Management Plan.

G. Subrecipient Compliance Monitoring

Monitoring is necessary to ensure that the MTA/OLTS's subrecipients meet Federal and State requirements. While the local subrecipients are required to sign and submit annual certifications and assurances to the MTA/OLTS, the MTA/OLTS actively examines all subrecipients to ensure that funds are being used as intended.

Monitoring local subrecipients serves several functions, including review of compliance with Federal and State requirements and review of LOTS service performance. Monitoring ranges from informal observation and review, to auditing compliance with Federal and State requirements, to enforcement of requirements in which a subrecipient is found to be deficient.

MTA/OLTS has established and follows an oversight program composed of the following seven procedures:

1. **Providing Ongoing Subrecipient Training and Education.** Training is provided twice yearly. Examples of recent topics include new Title VI program requirements; revised ADA program requirements; and new FAST Act requirements for Transit Asset Management Plans and State of Good Repair Programs. The MTA/OLTS conducts periodic monitoring of subrecipients compliance with new program requirements.

2. **Conducting Subrecipient Triennial and Specific FTA Program Requirement Reviews.** The MTA/OLTS maintains a policy of conducting a full Triennial Review of each of the subrecipients in the State of Maryland (currently 22) once every three to five years. The MTA/OLTS conducts an annual review of risks and the findings of completed Triennial Reviews and specific FTA program review findings to determine the next cycle order for its Triennial Reviews. The MTA/OLTS also conducts audits/reviews of particular FTA compliance requirements for all or some of its subrecipients based upon a state-wide demonstrated need, individual subrecipient finding(s), or changes in FTA requirements.

3. **Scheduling Quarterly and As-needed Subrecipient Meetings and Reviews With an Increased Emphasis on Continuing Program Oversight.** The MTA/OLTS maintains a policy to meet with each Maryland subrecipient on a quarterly fiscal year basis (four meetings per year). At a minimum at least one of the quarterly meetings must be in person. In an effort to provide enhanced oversight at the quarterly meetings, the MTA/OLTS utilizes these additional compliance procedures at least once (or more often as needed) during the quarterly meeting cycle: review outstanding FTA-funded procurements; review current printed schedules and website for required ADA, Title VI and service information; review status of implementation actions needed to resolve identified deficiencies. These reviews are documented on an MTA/OLTS prepared quarterly status report prepared for each subrecipient that highlights capital project status, operating project status, preventive maintenance, accidents, items of specific concern, and new items identified.

4. **Annual Subrecipient Submittal of Audits.** MTA/OLTS requires annual submittal of each subrecipient's audit in accordance with the provisions of Title 2 of the Code of Federal Regulations (2 CFR 200), reviews the audit findings, and follows up with each subrecipient to ensure their compliance with any transit related findings within 90 days.

5. **Annual Submittal of Subrecipient's Grant Applications.** Annually the MTA/OLTS requires each subrecipient to submit a grant application providing detailed program description and information demonstrating compliance with federal and state requirements, certifications and assurances.
6. **Identification of Subrecipient's Common and Program-specific Deficiencies.** On an ongoing basis, the MTA/OLTS review all compliance oversight activities that have occurred over the prior year to identify common and program specific deficiencies found for its subrecipients. The review helps to determine new training opportunities, outstanding subrecipient deficiency findings for follow-up and new areas of compliance emphasis at quarterly meetings.

7. **Establishing and Maintaining an Active Review Process.** MTA/OLTS ensures subrecipients implement timely actions and plans required to resolve deficiencies identified in the Annual Single Audit, Triennial or specific FTA program requirement reviews by establishing achievable and mutually agreed deadlines, conducting as-needed and programmed status meetings, and providing sample templates and acceptable program specific information to subrecipients. Subrecipient failure to meet deadlines is reviewed on a case-by-case basis to determine further remedial or corrective actions.

XX. STATE MANAGEMENT PLAN UPDATE

Revisions to the Section 5339 State Management Plan will only be made when significant changes occur in the Federal Section 5339 Program or when major changes occur in the State administration of the program.

When program changes occur and updates to the State Management Plan are required, the draft version of the plan will be placed on the Maryland Transit Administration's website for review. There will be a designated timeframe for comments to be received and comments will be considered for inclusion in the final version of the State Management Plan.