



TITLE VI PROGRAM

Anticipated Board Approval Date: **October 14, 2026**

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GTEA Board Resolution Adopting Title VI Program

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Board Resolution will be inserted after formal adoption by the full GTEA Board of Directors

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Section 1. General Requirements and Guidelines

The Georgia Transportation Efficiency Authority (GTEA) is a Federal Transit Administration (FTA) grant recipient and has adopted this Title VI Program to ensure that its programs and projects are conducted in a nondiscriminatory manner. GTEA's Title VI Program follows the requirements of FTA C 4702.1B, dated October 1, 2012, that requires all recipients to implement the general requirements and guidelines established in Chapter III of the Circular. GTEA assumed responsibility for the management of the Xpress Commuter Bus Service May 12, 2026 after the Georgia General Assembly passed House Bill 297 that recasts the Atlanta-region Transit Link Authority (ATL) into the new agency Georgia Transportation Efficiency Authority during the 2026 legislative session.

A. Statement of Policy

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. GTEA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its program and activities on the basis of race, color, or national origin as protected by Title VI. It is GTEA's policy that all subrecipients, contractors and subcontractors shall adopt Title VI policies and shall implement procedures to ensure that GTEA's services are provided without discrimination on the basis of race, color, or national origin.

B. Notice to Public

GTEA's *Statement of Policy* shall be published on the GTEA website at <https://atltransit.ga.gov/>. A copy of the *Statement of Policy* is included in **Appendix A** of this document. The Title VI Notice to Public/*Statement of Policy* shall be distributed to the public in public areas of the GTEA offices, transit vehicles, and offices of contracted transit service providers, if applicable. The Title VI Notice and Program Plan is distributed to GTEA Board members.

C. Title VI Complaint Procedures and Forms

GTEA utilizes the *Title VI Complaint Procedures and Forms* included in **Appendix B** of this document.

D. Title VI Investigations, Complaints, and Lawsuits

i. Background

In order to fulfill FTA's requirement to record and report transit-related Title VI investigations, complaints, and lawsuits, GTEA prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA; and
- Lawsuits, and
- Complaints naming the recipient.

These investigations, complaints, and lawsuits are prepared, logged, and maintained by GTEA's Title VI Coordinator.

As of the date of this Title VI Program, GTEA has not received any formal Title VI related complaints, and there are no ongoing or closed investigations or lawsuits.

E. Public Participation Plan

GTEA has developed a *Public Participation Plan* that includes an outreach plan to engage minority, low-income, and limited English proficient populations in GTEA activities/programs. GTEA's *Public Participation Plan* is found in **Appendix C** of this document.

F. Limited English Proficiency Access Plan

GTEA has developed its *Limited English Proficiency Access Plan* in compliance with Title VI, United States Department of Transportation's (USDOT) implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, August 11, 2000).

GTEA's *Limited English Proficiency Access Plan* is included in **Appendix D** of this document.

G. GTEA Board Structure

The thirteen (13) GTEA Board members consists of eight (8) individuals appointed by the Governor, two (2) individuals appointed by the President of the Senate, two (2) individuals appointed by the Speaker of the House, and the commissioner of transportation (see O.C.G.A. § 50-39-5). **There is one vacant seat as of August 2026.**

Table 1: GTEA Board Demographics

GTEA Board Demographics					
2026 Board	Caucasian	African American	Asian/Indian American	Vacant	Total
Members	11	0	1	1	13
Percent	84.62%	0%	7.69%	7.69%	100%

The GTEA Board members are appointed in the following manner, per the Official Code of Georgia Annotated (O.C.G.A.) 50-39-5:

"50-39-5. Creation of board; membership; qualification; reimbursement; removal; record keeping; audits and inspections.

(a) The management of the business and affairs of the authority shall be vested in a board, subject to the provisions of this chapter and to the provisions of bylaws adopted by the board as authorized by this chapter. For purposes of the initial appointment of members of the board pursuant to this Code section and until any board action is taken, the Governor shall be authorized to designate a county as a compliance zone county in accordance with the purposes of this chapter.

(b) The board shall be composed of the following members:

(1) Eight individuals appointed by the Governor, at least five of whom shall reside within a compliance zone county;

(2) Two individuals appointed by the President of the Senate, at least one of whom shall reside within a compliance zone county;

(3) Two individuals appointed by the Speaker of the House of Representatives, at least one of whom shall reside within a compliance zone county; and

(4) The commissioner of transportation.

(c) All appointed members of the board and their successors shall each serve a term of four years and until the appointment and qualification of a successor except as otherwise provided in this Code section. No person holding any other office of profit or trust under the state, other than the commissioner of transportation, shall serve upon the board. The chairperson of the board shall be appointed by the Governor, and a vice chairperson shall be selected annually from among the members by majority vote of those members present and voting. Vacancies in office shall be filled in the same manner as the original appointments. A person appointed to fill a vacancy shall serve for the unexpired term. No vacancy on the board shall impair the right of the quorum of the remaining members then in office to exercise all rights and perform all duties of the board.

(d) Members of the board shall be entitled to and shall be reimbursed for their actual travel expenses necessarily incurred in the performance of their duties and, for each day actually spent in the performance of their duties, shall receive the same per diem as do members of the General Assembly.

(e) Members of the board shall be subject to removal by the appointing authority for misfeasance, malfeasance, nonfeasance, failure to attend three successive meetings of the board without good and sufficient cause, abstention from voting unless authorized under subsection (e) of Code Section 50-39-6, or upon a finding of a violation of Code Section 45-10-3 pursuant to the procedures applicable to such Code section. A violation of Code Section 45-10-3 may also subject a member of the board to the penalties provided in subparagraphs (a)(1)(A), (a)(1)(B), and (a)(1)(C) of Code Section 45-10-28, pursuant to subsection (b) of such Code section.

(f) Members of the board shall be subject to the applicable provisions of Chapter 10 of Title 45, including without limitation Code Sections 45-10-3 through 45-10-5. Members of the board shall be public officers who are members of a state board for purposes of the financial disclosure requirements of Article 3 of Chapter

*5 of Title 21. The members of the board shall be accountable in all respects as trustees. The board shall keep suitable books and records of all actions and transactions and shall submit such books together with a statement of the authority's financial position to the state auditor on or about the close of the state's fiscal year. The books and records shall be inspected and audited by the state auditor at least once each year."*¹

H. Subrecipient Assistance and Monitoring

As applicable, GTEA may provide assistance to subrecipients to ensure compliance with Title VI general reporting requirements. GTEA will monitor subrecipients, contractors and subcontractors in accordance with monitoring procedures included in **Appendix C, Section D**.

The GTEA currently has four (4) subrecipients:

- Coweta County;
- Forsyth County;
- Georgia State University; and
- the Three Rivers Regional Commission.

I. Determination of Site

GTEA does not currently own, control, or maintain any property.

J. Transit Facility Title VI Site Equity Analysis

GTEA's required procedures for performing a Transit Facility Title VI Site Equity Analysis are written and available in **Section 2.E**. At this time, GTEA has not conducted any transit facility Title VI Site Equity Analysis reviews as required by FTA Circular 4702.1B.

K. GTEA Title VI Program Adoption

The GTEA's Board adopted the GTEA Title VI Program during their regularly scheduled meeting on October 14, 2026. GTEA staff conducted a public comment period from September 1 through September 30, 2026, and two public hearings on September 23, 2026. The public hearings employed all current public health recommended guidelines for participants. Additional methods of providing public comment remained in place including email, phone, and mail.

There were no formal public comments submitted during the public comment period.

Section 2. Requirements of Fixed Route Transit Providers

A. Service Standards and Policies

GTEA has established Xpress Service Standards and Policies (**Appendix E**) which establishes service standards pertaining to:

¹[O.C.G.A. § 50-39-5](#)

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

B. Demographics, Survey Data, and Service Profile Maps

As required by FTA Circular 4702.1B, Chapter IV, GTEA has prepared demographic and service profile maps of the Xpress service area utilizing data from the 2024 Census American Community Survey. Copies of the maps based upon Xpress' current service and the demographic data from the 2024 Census American Community Survey are included in **Appendix F**. Table 2 provides a demographic summary comparing minority, low-income, and limited English proficiency (LEP) populations in the GTEA 13-County Jurisdiction, a calculated systemwide Xpress ridership catchment area, and demographic information collected via Xpress customer surveys. Additional details regarding survey data, the catchment area methodology, and catchment area demographics are provided in **Appendix G**.

Table 2: Demographic and Service Profile

Demographic Category	GTEA 13-County Jurisdiction	Xpress Catchment Area	2025 Customer Satisfaction Survey*
Minority	61.0%	61.3%	75.8%
Low Income	26.2%	25.2%	20.9%
Limited English Proficiency (LEP)	8.3%	8.5%	7.7%

* The 2025 Xpress Customer Satisfaction Survey was conducted online in Fall of 2025. More details are provided in Appendix G.

As shown in Table 2, recent survey data show that Xpress tends to have a higher proportion of minority riders, a lower proportion of low-income riders, and a lower proportion of LEP riders, relative to the GTEA 13-County Jurisdiction and the overall Xpress ridership catchment area. The Xpress catchment area, which can be interpreted as the geographic area from which Xpress riders are most likely to be attracted and served, has proportions of minority, low-income, and LEP populations that are consistent with the region as a whole.

C. Results of Monitoring

As required by FTA Circular 4702.1B, GTEA will monitor the Xpress commuter bus service for Title VI compliance, once every three years, based on the *Service Standards and Policies*. ATL staff prepared a Title VI Service Standards Monitoring Report which was reviewed and approved by the ATL's Board of Directors on October 6, 2022. The presentation and ATL Board meeting minutes are included in **Appendix H**.

ATL staff determined that due to the size and scale of the Redefine the Ride major service changes, implemented in July and September of 2025. On May 12, 2026 the Georgia General Assembly passed

House Bill 297 that recasts the Atlanta-region Transit Link Authority (ATL) into the new agency Georgia Transportation Efficiency Authority during the 2026 legislative session. GTEA staff intends to complete the next compliance monitoring report during calendar year 2028.

D. Public Engagement Process for Setting Title VI Policies

Prior to formal adoption by the GTEA Board, GTEA will conduct a 30-day public comment period that will begin on September 1 and end on September 30, 2026. Consistent with GTEA's Public Participation Plan, the following activities will take place:

- A. GTEA will publish a draft GTEA Title VI Program on the GTEA and the Xpress web site.
- B. GTEA staff will host one public hearings on September 23, 2026.
- C. Notices will be posted on Xpress buses announcing the public comment period, public hearing date and availability of the draft Title VI Program, related policies and definitions including major service change, fare change, disparate impact, and disproportionate burden.
- D. Advertise the public hearing in newspapers of general circulation at least two weeks prior to the public hearing. Newspapers include the Fulton County Daily Report, MundoNow, and others that provide coverage to the 13-county area.
- E. Additional options available to provide public comments include mail, email, and/or phone:
GTEA Civil Rights Officer
Georgia Transportation Efficiency Authority
245 Peachtree Center Ave., Suite 2200
Atlanta, GA 30303
TitleVI@gtea.ga.gov
(404) 893-2100

The public comment period will end prior to the October 14, 2026, GTEA Board of Directors meeting.

E. Service and Fare Equity Analysis Procedures

GTEA has adopted Title VI Service Policies and Definitions including major service change, disparate impact, and disproportionate burden.

A **major service change** is defined as any route elimination, route addition, or service change of more than thirty-five percent of the revenue hours of operation for an individual GTEA-operated Xpress route. Temporary changes in service lasting twelve months or less are exempt.

A Major Service Change **Disparate Impact** is defined as anytime the expected distribution of adverse effects to minority passengers is 15 percentage points more than the GTEA-operated Xpress average minority passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey or an alternate method as appropriate. For a major service change that results in entirely new service, Census data will be used.

A Major Service Change **Disproportionate Burden** is defined as anytime the expected distribution of adverse effects to low-income passengers is 3 percentage points more than the GTEA-operated Xpress average low-income passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey or an alternate method as appropriate. For a major service change that results in entirely new service, Census data will be used.

The effects of any **fare change** will be considered **disparate and/or disproportionate** if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership.

GTEA will conduct a Title VI service equity analysis for all Xpress fare changes and major service changes. Prior to implementation of a fare or major service change, GTEA will evaluate such changes to determine whether they will have a discriminatory impact based on race, color, or national origin. Although low-income populations are not a protected class under Title VI, GTEA will also evaluate changes to determine whether fare or major service changes create a disproportionate burden on low-income populations.

If GTEA finds that a fare or major service change results in a disparate impact to minorities or a disproportionate burden on low-income individuals, GTEA will seek to avoid, minimize, or mitigate such impact and reanalyze the impacts of newly proposed changes. If GTEA does not alter the proposed changes, or, after revisions finds that minority and/or low-income populations continue to bear disproportionate adverse effects, GTEA will implement the changes only if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no feasible alternatives that would have a less disparate/disproportionate impact on minority and/or low-income riders but would still accomplish GTEA's legitimate program goals.

The GTEA Board is responsible for approving Xpress fare and major service changes and will consider the evaluation of disparate impacts and disproportionate burdens and mitigation plans prior to approving fare changes or major service changes.

Since the adoption of the previous Title VI Program on October 5, 2023, the GTEA (previously known as ATL) has conducted two separate equity analyses. Both equity analyses completed were for major service changes. The Memorandums, Presentations, and Board Resolutions showing each approval from the GTEA/ATL's Board of Directors may be found in **Appendix I**.

i. Service Equity Analysis for Major Service Changes

For GTEA operated Xpress major service changes, effects are measured in projected annual ridership. An **Adverse Effect** is a negative change in ridership while a **Beneficial Effect** is a positive change in ridership. When evaluating service changes, GTEA recognizes that the elimination or addition of an GTEA operated Xpress route, rather than a change in headways, presents a greater degree of impact, and will consider such differences in degrees when planning and evaluating service changes.

Title VI guidance requires that GTEA develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). The definitions from Section E above are used to determine when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations.

ii. Equity Analysis for Fare Changes

For GTEA operated Xpress fare changes, adverse effects are measured in the change in the average fare paid by minority and low-income communities. GTEA will determine whether there are disparate impacts on minority riders and/or disproportionate burdens posed on low-income riders by analyzing

the distribution of burden on the Title VI protected groups and the overall ridership. GTEA will determine the distribution of impacts by:

- Determining the number and percent of users of each fare media being changed across three user groups: overall ridership, minority riders, and low-income riders.
- Reviewing fares for each user group before and after the proposed change focusing on average cost per trip.
- Determining the percentage increase or decrease in average cost per trip for each of the three user groups due to the proposed fare change.

The effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership. Data used in the above analysis will come from the most recent on-board customer survey or an alternate method as appropriate. GTEA will use the results of the above analysis to avoid, minimize or mitigate the impact of fare media changes on minority and low-income populations.

iii. Equity Analysis for Site or Location of Facilities

For any potential facilities, the GTEA will follow federal guidance provided in Title 49 CFR Section 21.9(b)(3) and Appendix C, Section (3)(iv). Early during the planning stage the GTEA will ensure that the proposed location is selected without regard to race, color, or national origin. GTEA will engage in outreach to persons potentially impacted by the siting of any potential operating and maintenance facility.

A Title VI site equity analysis will compare equity impacts of multiple siting alternatives, and the analysis will occur before the selection of the preferred site.

When evaluating potential locations for new facilities, the GTEA will assess potential impacts at alternative site locations to identify potential adverse impacts. Analysis will be completed at the Census tract or block group, as appropriate to ensure that proper perspective is given to localized impacts.

If the GTEA determines that the selected location of a new facility will result in a disparate impact on the basis of race, color, or national origin, the GTEA will only locate the project in that location if there is a substantial legitimate justification, and there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The GTEA will demonstrate both disparate impact and disproportionate burden tests are met; and demonstrate that the GTEA considered and analyzed alternatives to determine whether potential alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then selected the least discriminatory alternative.

Appendix A – Notice to Public

THE GEORGIA TRANSPORTATION EFFICIENCY AUTHORITY

TITLE VI

Statement of Policy

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Georgia Transportation Efficiency Authority (GTEA) and the Xpress commuter service is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin, as protected by Title VI.

GTEA's subrecipients, contractors and subcontractors are required to ensure nondiscrimination in all aspects of their program activities.

Filing a Discrimination Complaint

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, or national origin may file a Title VI complaint. Complaints may be filed directly to GTEA or to the Federal Funding Agency (address included on complaint form). In order to file a complaint, the complainant must complete a complaint form and submit the form to the GTEA and/or the Federal Funding Agency. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainant's name, address, and telephone number or other means by which the complainant can be contacted. The Title VI Complaint form may be requested from the GTEA website at atltransit.ga.gov/accessibility-and-civil-rights/, contacting the GTEA Title VI line at (404) 893-2100 or in person from the GTEA office at 245 Peachtree Center Ave., Suite 2200, Atlanta, GA 30303. The completed form should be returned to the address shown below via email, mail, or in-person delivery.

For more information on the GTEA's civil rights program or to obtain a Complaint form, please visit <https://atltransit.ga.gov/accessibility-and-civil-rights/>, <https://xpressga.com/>, or contact the GTEA Title VI line at (404) 893-2100. Complaints should be filed in writing to the following:

GTEA Civil Rights Officer
Georgia Transportation Efficiency Authority
245 Peachtree Center Ave., Suite 2200
Atlanta, GA 30303
TitleVI@gtea.ga.gov
(404) 893-2100
OR
Title VI Program Coordinator
Federal Transit Administration
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

Si la información que se necesita en otro idioma, comuníquese con (404) 893-2100.

如果需要一种语言的信息，请联系 (404) 893-2100.

정보가 다른 언어로 필요한 경우 (404) 893-2100로 문의 바랍니다.

Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc (404) 893-2100.

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Appendix B – Complaint Procedures and Complaint Form

Title VI Complaint Procedures

This document outlines the Title VI complaint procedures related to providing programs, services, and benefits. It does not deny the complainant the right to file formal complaints with the Georgia Department of Transportation (GDOT), the Secretary of the US Department of Transportation (USDOT), Equal Employment Opportunity Commission (EEOC), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law. Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the grounds of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the Georgia Transportation Efficiency Authority (GTEA) Civil Rights Officer. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.
2. The complainant may download the complaint form at <https://atltransit.ga.gov/accessibility-civil-rights/>, or <https://xpressga.com/> or request the complaint form from GTEA's Civil Rights Officer. The complainant may also submit a written statement that contains all of the information identified in Section 3 a through f.
3. The complaint must include the following information:
 - a. Name, address, and telephone number of the complainant.
 - b. The basis of the complaint, i.e., race, color, or national origin.
 - c. The date or dates on which the alleged discriminatory event or events occurred.
 - d. The nature of the incident that led the complainant to feel discrimination was a factor.
 - e. Names, addresses, and telephone numbers of persons who may have knowledge of the event.
 - f. Other agencies or courts where complaint may have been filed and a contact name.
 - g. Complainant's signature and date.
 - h. If the complainant is unable to write a complaint, GTEA Civil Rights Officer will assist the complainant. If requested by complainant, the Civil Rights Officer will provide a language or sign interpreter.
 - i. The complaint may be emailed or mailed to the following address:

GTEA Civil Rights Officer
Georgia Transportation Efficiency Authority.
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
TitleVI@gtea.ga.gov

OR

Title VI Program Coordinator
Federal Transit Administration
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

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The GTEA Civil Rights Officer must acknowledge receipt of an emailed complaint within three working day of receiving it. The complainant should contact GTEA's Civil Rights Officer if an acknowledgment was not received within this time period to confirm whether GTEA's Civil Rights Officer received the complaint.

- j. Complainants have the right to complain directly to the appropriate federal agency however, they must do so within one-hundred eighty (180) calendar days of the last alleged incident.
4. The GTEA Civil Rights Officer will begin an investigation within fifteen (15) working days of receipt of a complaint.
5. The GTEA Civil Rights Officer will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed, to investigate the complaint. If the complainant fails to provide the requested information in a timely manner the GTEA Civil Rights Officer may administratively close the complaint.
6. The GTEA Civil Rights Officer will complete the investigation within ninety (90) days of receipt of the completed complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings, and recommendations for disposition.
7. A closing letter and exit interview will be provided to the complainant. The respondent will also receive a copy of the closing letter. Each will have five (5) working days from receipt of the report to respond. If either party responds negatively or has additional information to provide, an informal meeting will be arranged by the Civil Rights Officer. If neither party responds, the complaint will be closed.
8. The investigation report with recommendations and corrective actions taken will be forwarded to the appropriate federal agency, the complainant, and the respondent.
9. The GTEA Civil Rights Officer will advise complainants of their appeal rights to the appropriate federal agency.
10. The GTEA prepares and maintains a list of active investigations with information related to the date, summary of the allegation(s), the status and actions taken by the recipient or subrecipient in response to the complaint.

Si la información que se necesita en otro idioma, comuníquese con (404) 893-2100.

如果需要一种语言的信息 · 请联系 (404) 893-2100.

정보가 다른 언어로 필요한 경우 (404) 893-2100로 문의 바랍니다.

Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc (404) 893-2100.

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Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states “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.” Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

Please provide the following information in order to process your complaint. Assistance is available upon request. Complete this form and furnish a written (mail or email) copy to:

GTEA Civil Rights Officer
Georgia Transportation Efficiency Authority
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
TitleVI@gtea.ga.gov

OR

Title VI Program Coordinator
Federal Transit Administration
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

1. Complainant's Name: _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Telephone No. (Home): _____ (Business): _____
5. Person discriminated against (if other than complainant)

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

6. What was the discrimination based on? (Check all that apply):

- ☐ Race/Color
☐ National Origin

7. Date(s) of incident resulting in discrimination: _____
8. Describe the discrimination. What happened, where, and who was responsible? For additional space, attach additional sheets of paper or use back of form.
9. Did you file this complaint with another federal, state, or local agency, or with a federal or state court? (Check appropriate space) ☐ Yes ☐ No

If answer is yes, check each agency complaint was filed with:

Federal Agency _____ Federal Court _____ State Agency _____
State Court _____ Local Agency _____ Other _____

Provide contact person information for the agency you also filed the complaint with:

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Were there any witnesses? ☐ Yes ☐ No

If yes, please provide contact information:

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Date Filed: _____

Sign the complaint in space below. Attach any documents you believe supports your complaint.

Complainant

Si la información que se necesita en otro idioma, comuníquese con (404) 893-2100.

如果需要一种语言的信息，请联系 (404) 893-2100.

정보가 다른 언어로 필요한 경우 (404) 893-2100로 문의 바랍니다.

Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc (404) 893-2100.

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Appendix C – Public Participation Plan

Georgia Transportation Efficiency Authority Public Involvement/Public Participation Plan

The Georgia Transportation Efficiency Authority (GTEA) is a Federal Transit Administration (FTA) grant recipient, and this Public Participation Plan has been adopted by the GTEA Board. The GTEA is an Authority established by state law and its Board members are appointed by the Governor, the President of the Senate, and the Speaker of the House.

I. Goals and Guiding Principles

The Georgia Transportation Efficiency Authority (GTEA) is strongly committed to seeking and encouraging public participation in the planning process. The overall goal of the GTEA Public Participation Plan is to establish a framework for achieving mutual understanding of project issues among all concerned stakeholders involved and impacted by the relevant project or program change and to effectively engage minority, low-income, and limited English proficient populations in the public decision-making process. GTEA engages in public outreach to ensure that its stakeholders receive information regarding the status of relevant project or program changes and participate in the decision making and planning process.

Members of Limited English Proficiency (LEP) populations in particular are served through the use of translated documents when requested, website translation services, interpretation services available by calling (404) 893-2100 and by the availability of interpretation services where otherwise applicable.

II. Federal Requirements

Federal Transit Administration regulations require inclusive public participation in transportation decision making. These requirements are contained in multiple circulars that apply to GTEA's role as a direct recipient:

- FTA C 4702.1B, **Title VI Requirements and Guidelines for Federal Transit Administration Recipients**,
 - Chapter 3, paragraph 8, **Promoting Inclusive Public Participation**
 - Chapter 2, paragraph 9, **Requirement to Provide Meaningful Access to LEP Persons**.
- FTA C 4703.1, **Environmental Justice Policy Guidance for Federal Transit Administration Recipients**.
- 49 U.S.C. Sections 5307(b) which requires programs of projects to be developed with public participation.
- Executive Order 13166, **"Improving Access to Services for Persons with Limited English Proficiency"** (65 FR 50121, Aug. 11, 2000), which requires that recipients shall 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).

This GTEA Public Participation Plan is intended to document GTEA's activities to meet these federal requirements.

III. Public Participation Plan Goals

GTEA endeavors to provide meaningful opportunities for the public to assist staff in identifying social, economic, and environmental impacts of proposed transportation decisions. This includes input from low-income, minority and LEP populations, through the public participation methods identified in Section VI.

Additionally, GTEA endeavors to ensure that the comments it receives are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions. GTEA works to ensure that opportunities to participate are accessible physically, geographically, temporally, linguistically and culturally.

The GTEA may hold virtual meetings and/or participate in fewer in-person meetings in an effort to encourage public participation and engagement during unforeseen circumstances that may otherwise preclude or severely impact the ability to hold in-person sessions.

IV. DEFINITIONS

The definitions noted below are related to the Public Participation Plan. Additional definitions are included in FTA C 4702.1B.

Limited English Proficient (LEP) persons means persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-income person means a person whose annual household income is at or below GTEA's regionally developed threshold of \$50,000. FTA recipients are encouraged to use a locally developed threshold, such as the example definition found in 49 U.S.C. 5302 as amended by the Infrastructure Investment and Jobs Act (IIJA). Per the IIJA, a low-income person "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines. The GTEA's regionally developed threshold of \$50,000 corresponds with 150% of the 2026 HHS poverty guidelines for a family of 4².

Minority persons means the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.

² <https://aspe.hhs.gov/sites/default/files/documents/b1bfa16b20ae9b89d525bc35de7c1643/detailed-guidelines-2026.pdf>

- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

National origin means the particular nation in which a person was born, or where the person’s parents or ancestors were born.

V. Population Demographics

A. Minority Populations

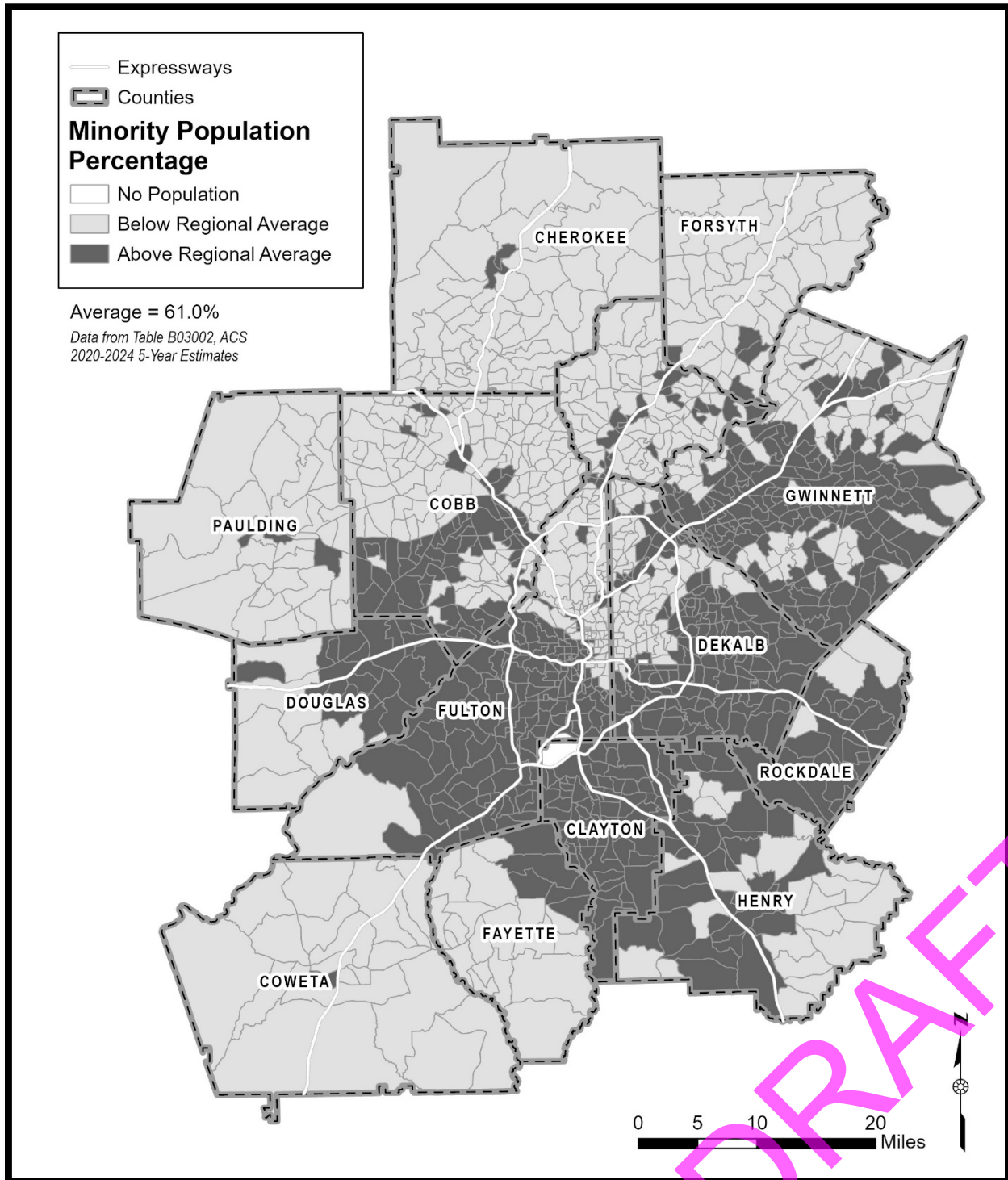
Using the United States Census Redistricting Data (2024), GTEA has determined that 61.0% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 3 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 3: Minority Population by County in GTEA 13-County Area

County	Total Population	Minority Population	Non-Minority Population	Percent Minority Population
Cherokee County	281,032	73,391	207,641	26.1%
Clayton County	298,924	275,512	23,412	92.2%
Cobb County	775,208	410,214	364,994	52.9%
Coweta County	152,852	50,041	102,811	32.7%
DeKalb County	765,351	551,479	213,872	72.1%
Douglas County	147,888	101,968	45,920	68.9%
Fayette County	122,244	54,366	67,878	44.5%
Forsyth County	267,287	102,134	165,153	38.2%
Fulton County	1,076,561	680,232	396,329	63.2%
Gwinnett County	979,864	679,815	300,049	69.4%
Henry County	249,960	169,046	80,914	67.6%
Paulding County	178,909	69,748	109,161	39.0%
Rockdale County	95,281	72,441	22,840	76.0%
GTEA 13-County Jurisdiction	5,391,361	3,290,387	2,100,974	61.0%
Source: American Community Survey 5-Year Estimates (2024), table B03002. *Minority population is defined as individuals whose races are not White or Non-Hispanic alone.				

The following map depicts the census block groups in the 13-county jurisdiction with a higher concentration of minority populations than the 13-county jurisdiction average. The map shows that areas of Clayton, Cobb, DeKalb, Douglas, Fulton, Gwinnett, Henry, and Rockdale Counties have a concentration of minority residents greater than the 13-county average.

Figure 1: Minority Population in GTEA 13-County Jurisdiction



B. Low-Income Populations

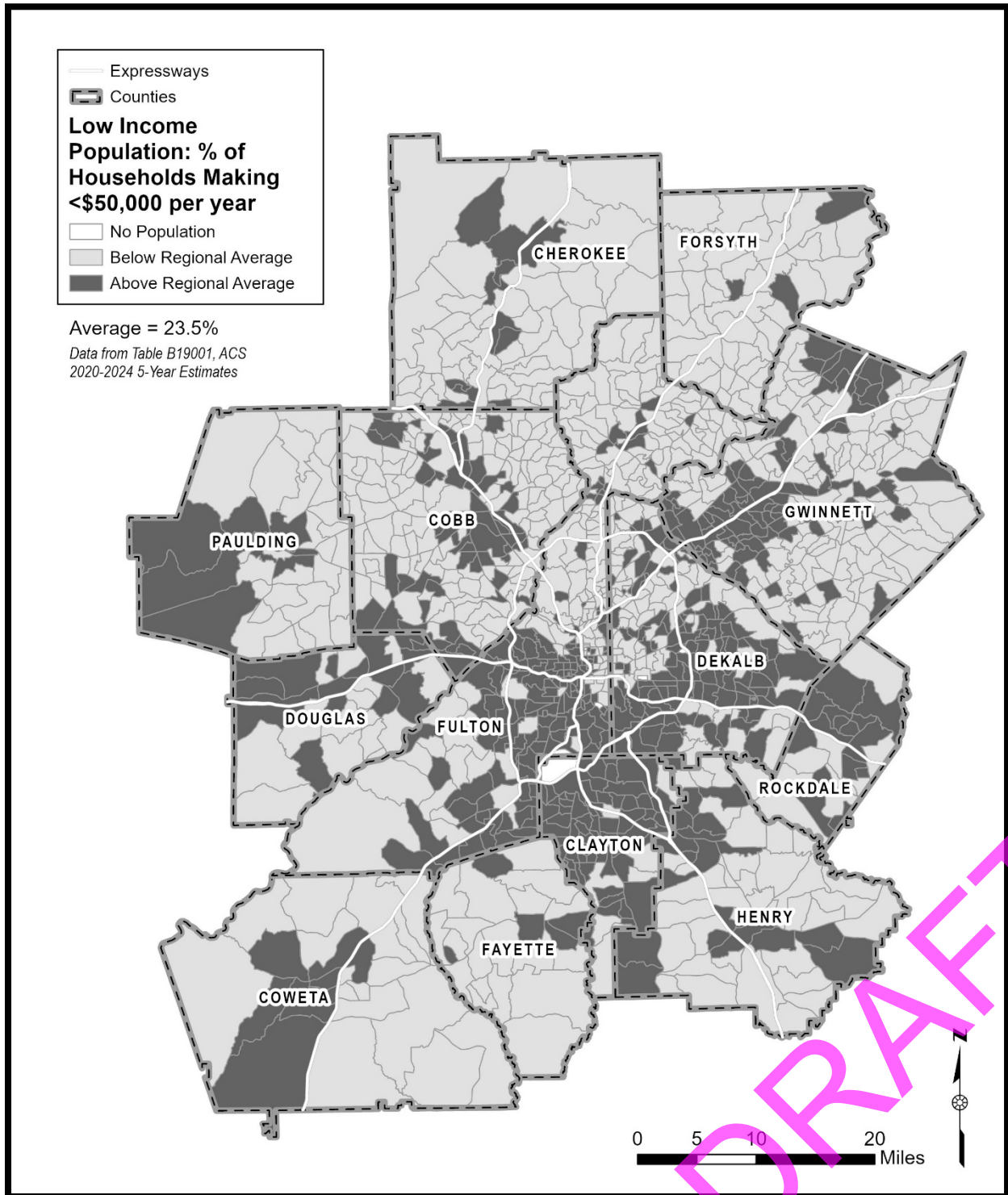
Table 4 presents the low-income population by county within the GTEA 13-county jurisdiction.

Table 4: Low-Income Population by County in ATL 13-County Jurisdiction

County	Percent Population with low-income (%)
Cherokee County	17.9%
Clayton County	36.9%
Cobb County	19.4%
Coweta County	21.5%
DeKalb County	27.8%
Douglas County	26.0%
Fayette County	17.9%
Forsyth County	12.3%
Fulton County	25.2%
Gwinnett County	23.6%
Henry County	21.1%
Paulding County	17.4%
Rockdale County	25.6%
GTEA 13-County Jurisdiction	23.5%
Source: American Community Survey 5-Year Estimates (2024), table B19001.	
*Low-income population is defined as households making less than \$50,000 per year	

The following map shows the areas of the GTEA jurisdiction that have higher concentrations of low-income households when compared to the average for the GTEA 13-County jurisdiction. Areas to the South and West of the central business district, as well as along the interstate corridors, generally have a higher concentration of households making less than \$50,000 per year.

Figure 2: Low Income Population in GTEA 13-County Jurisdiction



C. Limited English Proficient Populations

The United States Census' most recent American Community Survey (ACS) 5-year estimates (2024) offer a current and reliable estimate of the number, proportion, and geographic distribution of Limited English Proficiency (LEP) individuals in the GTEA 13-county jurisdiction. Specifically, the estimate shows persons 5 years or older where the language spoken at home is not English and English is spoken "Less than very well."

According to the ACS, of the total population over the age of five in the 13-county area (5,078,624):

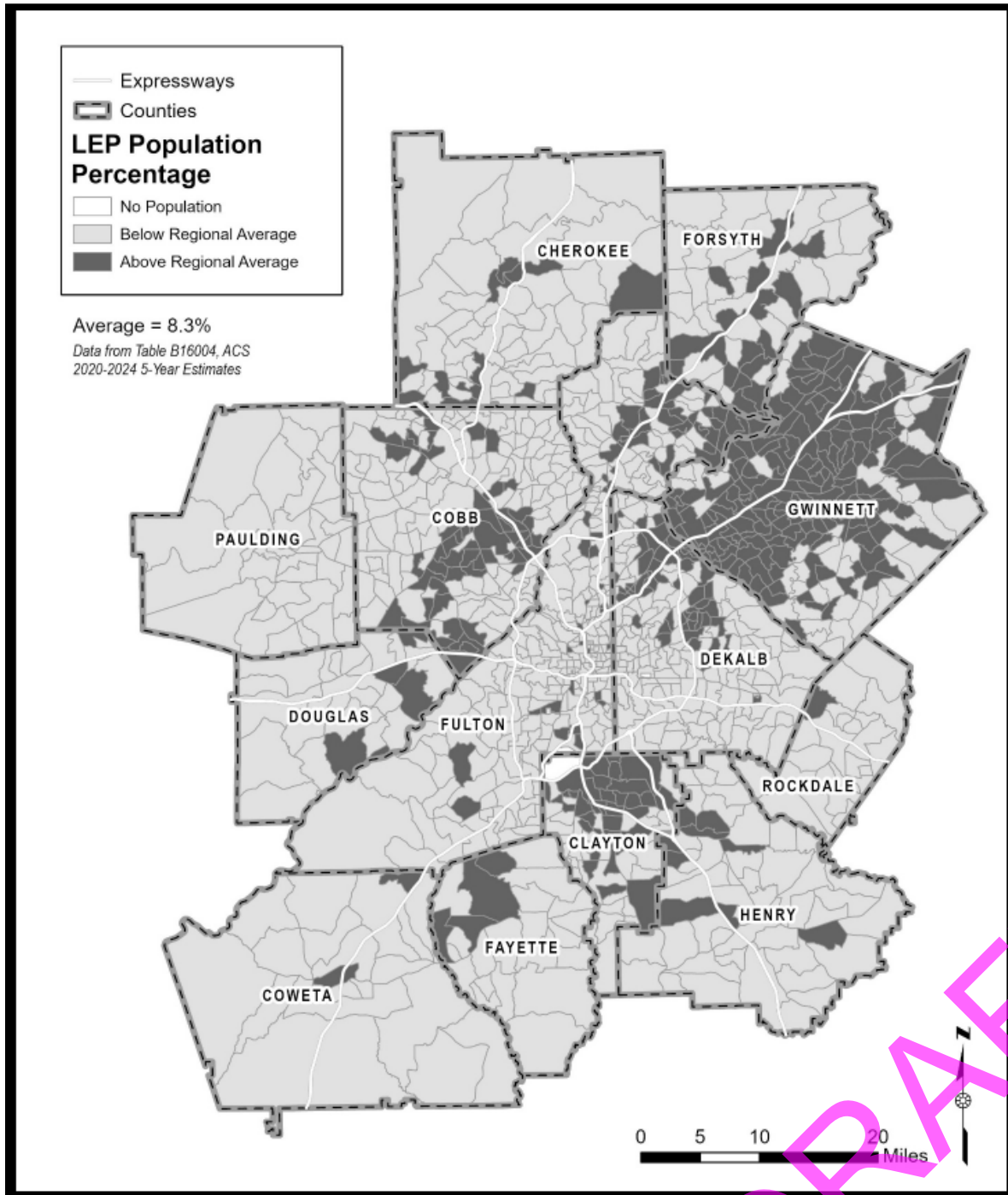
- Approximately 21.8% (1,111,442) speak a language other than English at home; and
- Approximately 8.3% (420,983) speak English less than "very well"

Table 5: LEP Population by County in GTEA 13-County Jurisdiction

County	Total Population of Speaking Age (5 Years and Older)	LEP Population*	Percent LEP Population
Cherokee County	265,900	15,404	5.8%
Clayton County	278,816	27,851	10.0%
Cobb County	731,550	57,241	7.8%
Coweta County	144,384	4,945	3.4%
DeKalb County	715,620	61,561	8.6%
Douglas County	139,266	5,924	4.3%
Fayette County	117,018	5,486	4.7%
Forsyth County	252,873	17,271	6.8%
Fulton County	1,019,041	51,445	5.0%
Gwinnett County	920,311	154,707	16.8%
Henry County	235,743	10,438	4.4%
Paulding County	168,101	4,254	2.5%
Rockdale County	90,001	4,456	5.0%
GTEA 13-County Jurisdiction	5,078,624	420,983	8.3%

Source: American Community Survey 5-Year Estimates (2024), table B16004.
*LEP population is defined as individuals who are 5 years or older where the language spoken at home is not English and English spoken is less than "Very well"

Figure 3: LEP Population by County in GTEA 13-County Area



VI. Public Participation Methods

GTEA strives to proactively promote public involvement and to inform the public of current initiatives, programs, and issues. The following are examples that GTEA may use to inform, reach out to invite participation, and to seek public input. It identifies how each example could best be used and is based on input collected from the community and staff experience. The examples are not listed in priority order.

- **Printed Materials Produced by GTEA:** Outreach information can be publicized in printed materials produced by GTEA.
- **GTEA Website:** The GTEA website, <https://www.atltransit.ga.gov>, is a communications tool providing substantial information about GTEA policies, programs, strategies, plans, and methods. The GTEA website provides the option to translate web pages into multiple languages.
- **Xpress Website:** The Xpress website, <https://xpressga.com/> is a communications tool providing substantial information about Xpress services, schedules, and policies. The Xpress website provides the option to translate web pages into multiple languages.
- **Media Targeted to Ethnic Communities:** Participation opportunities are publicized through newspaper publications serving primarily English and Spanish speaking audiences. GTEA also publicizes in other ethnic community media outlets when applicable.
- **Informational Public Meetings:** GTEA conducts several different types of informational public meetings. Meetings are designed to engage the public to provide input, testimony, or comments regarding proposed projects, policies, and plan changes. Venues for meetings should be fully accessible for persons with disabilities and are generally located in areas served by public transit. It is typical to conduct a series of meetings on a single topic. GTEA considers the best areas or communities to conduct meetings and hearings by first examining the topic and/or the issues that may affect riders and communities. GTEA secures meeting venues with consideration to time of day, length of time required for the meetings, transportation options, and the number of expected attendees.
 - **Meeting Formats**
 - **Informational Open House:** This format provides opportunities for participants to receive information at their own pace by visiting a series of information stations that may include tabletop displays, maps, Power Point presentations, photographs, visualizations, and other tools. Participants have the opportunity for one-on-one conversations with the appropriate staff. Occasionally open houses include a short educational presentation followed by a discussion period for comments and questions and answers. Participants are often given comment forms to provide written comments. Staff is available to take verbal comments and transcribe them to provide a written record.
 - **Public Hearings:** Public hearings are conducted to obtain formal comments for the public record. They are typically conducted with a hearing officer and, as applicable, a court reporter who will transcribe any public comments. When no court reporter is present, meetings are recorded.
 - **Virtual Open House/Public Hearings:** Due to unforeseen circumstances such as the COVID-19 health emergency and various mandated restrictions that may be

enacted within the GTEA jurisdictional boundaries due to these circumstances, open houses and/or public hearings may be presented in virtual format. Virtual meetings are to provide opportunities commensurate with in-person meetings to the extent practical and attainable. Formal comments are recorded as part of the virtual meeting forums.

GTEA may hold virtual meetings and/or participate in few in-person meetings in an effort to encourage public participation and engagement during unforeseen circumstances that may otherwise preclude or severely impact the ability to hold in-person sessions.

- **Translation and Interpretive Services** – GTEA works with translation services to translate written public information into other languages as needed. Prearranged onsite language interpretation service is provided upon request at public meetings and hearings.
- **Other Partner Agency Events** – GTEA participates in and attends partner agency meetings that may include the above-mentioned communication methods to provide public involvement activities relevant to the GTEA's functions. An example of this is the Atlanta region Metropolitan Planning Organization's (MPO) extensive public involvement and outreach for the Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP).

VII. PROGRAM/ACTIVITY SPECIFIC PUBLIC PARTICIPATION PROCESS

A. Overview

Using the regulations and guidance provided in federal and state law, staff uses the principles and guidance set out in this document to carry out public involvement activities that will ensure inclusive public participation in the decision-making process.

B. Methodology

Staff evaluates the program, policy, or other activity for which public involvement is either required or desirable to determine the most appropriate methods for achieving inclusive public participation in the decision-making process. Staff is not limited to only those specific activities, and within the resource limits of the GTEA, uses the best practices for engaging the public.

C. Public Participation Process for modifications to Title VI Policies and Definitions.

When considering changes to Title VI policies and definitions, GTEA provides an opportunity for public participation by conducting a 30-day public comment period and one public hearing, at a minimum.

- **30-Day Public Comment Process:**

GTEA will do the following as it relates to the public comment process:

1. Post notices to inform the public on the GTEA website. The notices will be placed prior to, and for the duration of, the 30-day public comment period

and will announce the proposed changes, public comment period, and public hearing date(s).

2. Advertise the public hearing(s) in a newspaper(s) of general circulation and via other print, video, or electronic media as deemed appropriate by the GTEA Department of Communications and External Affairs, or designee. Advertisements will appear no fewer than two weeks prior to the date of the public hearing.
3. Comments received outside of the 30-day public comment period may be considered in the decision-making process or may be reserved for consideration in future revisions of the policy addressed by the comment.
4. Following the completion of the 30-day public comment period, staff will prepare a public comment summary for consideration by the GTEA Board.

- **Public Hearing:**

When staff determines that a formal public hearing is to be held, the public hearing will consist of the following:

1. An information period to allow staff to explain the nature of the changes in service, detailing the reasoning behind the proposal to the public.
2. Opportunity for public comment that allows members of the general public an opportunity to express their views.
3. A court reporter, if determined as applicable, will be present to record comments from members of the public who prefer to provide direct, oral comments. When no court reporter is present, meetings are recorded. The recording serves as the official public record.
4. Public hearings will be of public record and open to all members of the public. All public hearings must be recorded and transcripts available to the public upon request.

Public hearings are typically held within the 30-day public comment period but may begin before the period formally starts and extend after the period has ended; so long as the last hearing is held prior to the day in which the GTEA Board is scheduled to address the issues under review.

- **Special Needs:**

Public hearings and meetings will be held in an ADA accessible facility and in areas served by public transit, if possible. Hearing materials, publications, and explanations in alternative formats will be provided upon request. Braille publications for the visually impaired will be provided upon request, given a two-week notice. All requests for alternative formats for hearing materials and publications should be submitted to the Department of Communications and External Affairs, Georgia Transportation Efficiency

Authority at GTEA's headquarters address as listed on its website in writing at least 4 working days prior to the hearing date.

D. GTEA Oversight of Contractors and Subrecipients

The GTEA will monitor subrecipients, contractors and subcontractors for compliance with Title VI per FTA Circular 4702.1B, Chap. III, Part 12 requirements.

Accordingly, the Department of Communications and External Affairs, the Civil Rights Officer, and the Compliance Officer shall be responsible for monitoring and observing the public involvements activities of and maintaining the records necessary for documenting that all GTEA subrecipients are conducting compliant public involvement activities, to include, if applicable, if making significant changes in transit programs, services or fares. GTEA's subrecipient monitoring procedures, if applicable, include the following:

1. Request and maintain files for subrecipient Title VI programs.
2. Annual review of subrecipient/contractor Title VI programs to determine compliance with FTA requirements.
3. Develop a corrective action plan to address any deficiencies and assist as applicable to achieve compliance as required by FTA C. 4702.1B Chapter III 12.
4. Conduct on-site reviews to ensure compliance with program implementation activities including, but not limited to the completion of required equity analysis, the posting of policy and training.

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Appendix D – Limited English Proficiency Access Plan

I. Introduction

The Georgia Transportation Efficiency Authority (GTEA) has developed its Limited English Proficiency (LEP) Plan to be consistent with Title VI of the Civil Rights Act of 1964, USDOT's guidance "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (70 FR 74087, December 14, 2005), and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, August 11, 2000). In developing the LEP Access Plan, GTEA has taken reasonable steps to ensure individuals who are limited-English proficient (LEP) have meaningful access to benefits, services, information, and other important portions of its programs and activities.

GTEA's LEP Access Plan consists of two main components. The first component is the Four Factor Analysis that GTEA has used to determine its key affected LEP communities. The second component is an Access Plan which addresses how the authority is to provide services to LEP individuals, train employees, and monitor and update the program.

II. Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Program

The United States Department of Transportation (USDOT) guidance outlines four factors recipients should apply to the various kinds of contact they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

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

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of USDOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on service providers and local governments.

III. The Four Factor Analysis

This LEP Plan is based on the Four Factor Analysis outlined above and below. Each of the following factors is examined to determine the level and extent of language assistance measures required to ensure meaningful access to GTEA activities by LEP persons.

Factor 1: The Number or Proportion of LEP Persons Eligible or Likely to be Encountered by GTEA

For the GTEA, the primary opportunities for direct interaction with the public occur at public meetings, community outreach activities, attendance at events with partner transit agencies and during the delivery of the Xpress commuter bus services. GTEA's primary functions are as follows:

- Review and approval of the Atlanta Metropolitan Planning Organization's Transportation Improvement Program (TIP).
- Developments of Regional Impact (DRI) evaluations.
- Monitoring existing federal grants and subgrantees, subrecipients, contractors and subcontractors.
- Operations, maintenance, planning and delivery of the Xpress commuter bus service.
- Regional transit collaboration
- Administration and monitoring of regional federal and state transit funding
- Interaction and coordination with existing transit operators

Regularly scheduled meetings of the GTEA Board of Directors are open to the public and GTEA welcomes comments by the public at the beginning of each meeting.

GTEA has multiple opportunities for contact with the public. The official transition of management responsibility for the Xpress Commuter Bus Service occurred on May 12, 2026. The likelihood of direct contact with underserved populations such as the limited-English proficient community is consistent. In addition, GTEA, as the oversight agency for regional planning and funding, interacts with partner agencies that may have frequent direct contact with underserved populations such as the limited-English proficient community.

Population data provided by the Census and the American Community Survey helps the GTEA understand which languages other than English are predominantly spoken in the 13-county area and can inform future decisions to foster and improve engagement with LEP populations.

Based on the 2020-2024 American Community Survey census product, just over eight percent of the residents of the 13-county GTEA jurisdiction age 5 or older speak English less than "very well." Table 6 evaluates the LEP population according to the primary language spoken at home, indicating that the LEP persons most likely to be encountered by GTEA are those who speak Spanish, Vietnamese, Chinese and Korean.

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Table 6 – Language Spoken at Home by Population 5 Years and Over that Speak English Less than Very Well

Language Spoken at home by population 5 years and Over that Speak English Less than very Well					
Language Spoken at Home (Other than English)	Population of 13 - County region That Speaks English		Population of Language Speakers	Percent* of Language Speakers	Percent* of Region Population (that speak English less than very well)
	Very Well	Less than Very Well			
Spanish	305,019	237,850	542,869	43.8%	4.7%
Other Indo-European	98,216	37,833	136,049	27.8%	0.7%
Other and unspecified	77,749	22,044	99,793	22.1%	0.4%
Other Asian and Pacific Island	55,657	20,334	75,991	26.8%	0.4%
Chinese (incl. Mandarin, Cantonese)	25,788	25,858	51,646	50.1%	0.5%
French, Haitian, or Cajun	39,961	11,285	51,246	22.0%	0.2%
Vietnamese	16,679	29,618	46,297	64.0%	0.6%
Korean	20,628	21,585	42,213	51.1%	0.4%
Russian, Polish, or other Slavic	17,697	7,334	25,031	29.3%	0.1%
German or other West Germanic	15,176	1,309	16,485	7.9%	0.0%
Arabic	11,032	3,585	14,617	24.5%	0.1%
Tagalog (incl. Filipino)	6,857	2,348	9,205	25.5%	0.0%
All non-English languages	690,459	420,983	1,111,442	37.9%	8.3%

Source: ACS 2020-2024, Table C16001: Language Spoken at Home for the Population 5 Years and Over.

Note: the margin of error for estimates of smaller sized populations are significant and therefore much less certain.

*Population 5 Years and Over of the GTEA 13-County jurisdiction is 5,078,624

Table 6 also tracks the percentage of each language group that speak English less than very well. Of the top seven languages spoken at home that make up the largest LEP populations in the 13-county area, Vietnamese has the highest rate of limited English proficiency, 64%, followed by Korean then Chinese at 51.1% and 50.1% respectively. This information and the safe harbor threshold³, as defined in federal guidance, further exemplifies the need for translation services for the following languages:

- Spanish;
- Chinese
- Vietnamese;
- Korean;
- Tagalog;
- Arabic;
- German;
- Russian; and
- French.

GTEA is aware of the Executive Order 14224, Designating English as the Official Language of the United States signed on March 1, 2025 and will follow any updated guidance provided by our federal partners, including the Department of Justice and the United States Department of Transportation (USDOT)

Factor 2: Frequency of Contact with LEP Individuals

Individuals are able to engage with the GTEA in a variety of ways: via telephone with GTEA staff and Xpress staff, in-person at GTEA Board meetings, public meetings, other agency events, community outreach

³ <https://www.transportation.gov/sites/dot.gov/files/2020-01/Guidance%20to%20Federal%20Financial%20Assistance%20Recipients%20Regarding%20LEP%20-%200508.pdf>

events, through delivery of Xpress commuter bus service, or through the GTEA and Xpress websites. These primary points of contact are monitored by the GTEA to estimate the frequency with which LEP persons come into contact with the Authority. Monitoring occurs via an evaluation of call data, customer surveys, operator feedback, website traffic, and attendance at publicly accessible meetings and activities.

The GTEA and Xpress utilize Google Translate on the website to assist LEP persons. The GTEA will track and record the number of page views to the GTEA webpage, including the number of times the website is translated into a language other than English. This tracking will allow the GTEA to monitor a webpage translation rate, comparing visits when the website was translated into a language other than English to the number of overall website visits each year.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community

The GTEA's key functions, referenced in the Factor 1 Section above, include activities for improving regional transit access and mobility in the Atlanta metropolitan area. The Xpress commuter bus service, one of the key functions, operates between suburban counties and major business districts. This service is potentially of significant importance to the LEP community, particularly those who are transit-dependent and live or work in the markets served by Xpress. The GTEA has a strong commitment to encouraging public involvement in regional transportation coordination and funding; it is important that resources are available to provide an inclusive environment. The LEP Access Plan is an integral part of achieving inclusiveness in the public participation process.

Factor 4: The Resources Available to GTEA and Overall Cost

To assist LEP persons, GTEA has resources available to provide information and translation assistance to LEP persons. These resources include Language Line translation services, public outreach, and staff training.

GTEA has access to various translation services. The total costs associated with GTEA's LEP monitoring and outreach efforts are estimated to be at least \$10,000 each year. These include the costs associated with Language Line translation services, placing public outreach notices in newspapers, providing printed translatable documents as needed and staff training. If needed, additional resources can be allocated to translation services.

Conclusion

The Four Factor Analysis outlined above indicates that GTEA has opportunities for direct interaction with the Atlanta region's sizable LEP population. These opportunities to potentially impact many persons in the LEP community through GTEA's role as the agency responsible for the Xpress commuter bus service, regional transit coordination and oversight of federal and state transit funding could be significant. Therefore, GTEA is committed to providing meaningful access to LEP individuals through GTEA's LEP Access Plan.

IV. Limited English Proficiency Access Plan

Based on results from the Four Factor Analysis, the Limited English Proficiency (LEP) Access Plan outlines how GTEA will provide language assistance services to notify LEP persons about the availability of

language assistance services. Additionally, the analysis provides guidance for the GTEA monitoring and update of the Access Plan.

To prepare the Access Plan, GTEA has focused on the points of potential contact and interactions with LEP individuals and communities. The points of contact identified are by telephone (direct call to the Customer Service Center and/or GTEA via contact information provided on website and outreach materials), email (via contact information provided online and outreach materials), in-person (onboard an Xpress commuter bus, at public meetings/hearings, during community outreach events, and at partner agency events), and via the GTEA and Xpress websites. The appropriate type of LEP assistance varies depending on the interaction point.

1. Language Assistance Services by Interaction Point:

- **Telephone:** The GTEA website and other distributed GTEA information provide telephone contact information for key staff with resources to communicate with LEP individuals. These include:
 - Designated staff have been trained to assist LEP individuals by connecting them with the Language Line interpretation service.
- **In-Person:** The primary types of in-person interactions are face-to-face encounters at GTEA Board meetings, public meetings and hearings, community outreach and partner agency events, and with Xpress Commuter Bus staff during service delivery and outreach events. Regardless of the specific location, there are several ways in which GTEA seeks to communicate with LEP individuals. These include:
 - The use of “I Speak” cards. These are available from staff at all public meetings/hearings and other events and on-board Xpress Commuter Buses. These cards allow the LEP individual to identify their spoken language. The staff member is then able to contact the Language Line interpretive services for assistance. In the event the LEP person is unable to identify their spoken language, the staff member will still contact Language Line services who will be able to assist in identifying the proper language.
 - The designated staff have access to the GTEA website which provides translated materials via Google Translate for additional assistance in-person.
- **Website:** The website allows users to select the translation language which includes, but is not limited to Spanish, Vietnamese, Korean, and Chinese. The website may be translated into many languages for LEP persons via Google Translate.

2. Plan to Notify LEP Persons of Language Assistance Availability

- **Telephone:** Designated staff will be trained to utilize the Language Line service to provide language assistance as necessary.
- **In-Person:** Staff representing GTEA at public meetings/hearings and other events will have “I Speak” cards available and Language Line ready in event LEP assistance is required. Xpress Commuter Buses have “I Speak” cards available on board to assist customers. Staff will determine the type of assistance needed. If written documentation is requested, staff

will follow up with the LEP person and provide appropriate written documentation free of charge, whether via printed copies or through advising the LEP person of the option to use Google Translate on the GTEA and Xpress websites.

- **Website:** The GTEA and Xpress websites each provide language assistance with the use of Google Translate. The websites provide fully translatable HTML text into a variety of languages, including but not limited to Spanish, Vietnamese, Korean, Chinese; the largest LEP populations in the region. Text on the website which is viewable via Google Translate directs LEP individuals to the GTEA contact information so that additional assistance may be provided through Language Line.

3. Monitoring, Evaluation, and Updates to the Language Access Plan

GTEA regularly evaluates the effectiveness of the LAP including:

- Staff will monitor the number of calls received, number of requests for Spanish assistance and the number of Spanish assistance requests that result in a transfer to a live operator.
- The Language Line interpretation service reports the number of calls directed to it by GTEA. Additionally, this information specifically identifies the language requested by the caller.
- Staff maintains a telephone log of their contact with individuals and notes their interaction with LEP persons.
- Staff involved in outreach efforts keep a log of the type of language assistance requested.
- Staff track the frequency with which Google Translate is used, the language selected, and the type of information translated.

The above monitoring activities feed into each subsequent Four Factor Analysis and LEP Access Plan update. Each subsequent Four Factor Analysis serves to evaluate the current plan and to identify additional steps which may improve our internal efficiency while positively affecting the accessibility for LEP persons. This evaluation and update will occur at least once every three years.

4. Employee Training to Ensure Timely and Reasonable Language Assistance to LEP Populations

The Language Access Plan provides a convenient and responsive program which is capable of maintaining a high level of accessibility for stakeholders. To ensure the process works properly, it is imperative that staff members be trained to respond appropriately to their intended interaction point. As such, the following training techniques apply:

- All applicable staff (e.g., GTEA contacts, public meeting/hearing representatives, outreach and affiliated agency representatives/attendees etc.) are provided with the LEP Access Plan and will be educated on procedures to follow.
- Training topics include:
 - Understanding the Title VI Program and LEP responsibilities;
 - Explanation of the language assistance services GTEA offers, with a focus upon likely interaction types for each staff member;
 - How to use the LEP “I Speak” cards;
 - How to access translation services via the GTEA website;
 - How to use the Language Line interpretation service;
 - Documenting language assistance requests; and

- How to handle a Title VI and/or LEP complaint.

Any questions or comments regarding this plan should be directed to the GTEA Title VI Officer.

GTEA Civil Rights Officer
Georgia Transportation Efficiency Authority
245 Peachtree Center Ave NE #2200
Atlanta, GA 30303
Phone: (404) 893-2100
Email: TitleVI@gtea.ga.gov

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Appendix E – Service Standards and Policies

Xpress Service Standards & Policies

1.0 Overview

The Georgia Transportation Efficiency Authority (GTEA) provides Xpress commuter transit service which is provided from outlying Atlanta suburban areas at designated locations, such as park and ride facilities, to the central downtown Atlanta business district, MARTA rail stations and/or other key activity centers within the Atlanta metro region. The service operates with limited stops utilizing interstate highways and a network of high occupancy vehicle and high occupancy toll/express lanes. The operation of Xpress commuter transit service is typically limited to the commute travel times each weekday between 5:00am and 9:00am and between 2:30pm and 6:30pm.

The primary purpose for maintaining service standards is to guide GTEA staff as to when service changes are necessary and ensure compliance with applicable federal guidelines. This document 1) sets GTEA's Xpress service standards policies, 2) establishes a timeframe for monitoring them, 3) defines major service changes, and 4) establishes policies necessary to ensure Xpress service does not create disparate impacts on minority populations nor pose disproportionate burdens on low-income populations.

2.0 Definitions

- a) **Headway** – The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- b) **Frequency** – Number of buses per hour on a specified route calculated by dividing 60 minutes by the route headway. Twenty-minute headway translates into a frequency of three buses per hour ($60/20 = 3$).
- c) **Inbound/Outbound Service** – Indicates the direction of a route, usually from a centralized base location, such as a central business district, rail station, or transfer center. Xpress buses, for instance, operate inbound from suburban park and ride lots to a rail station or major employment center. Outbound service would indicate the opposite direction of service.
- d) **Vehicle Load Factor** – The ratio of customers on board a bus compared to the number of available seats. For example, if a bus offers 57 seats and there are 63 customers on board, the load factor would be 1.10. Load factors greater than 1.0 indicate that customers are standing.
- e) **Farebox Recovery Ratio** – Total revenue generated by the ridership on a specified route divided by the operating cost for that route.
- f) **GTEA Operated Xpress Routes** – The Xpress routes that are paid for, and operated, by GTEA.
- g) **Route** – The scheduled path traced by an Xpress bus with a number of specific stops over a consistent time frame.
- h) **Trip** – A single course of travel within a route.
- i) **Minority Route** – GTEA operated Xpress routes that, according to the most recent on-board customer survey, have a percentage of minority riders that is at least 15 percentage points higher than the average concentration of minority riders on all GTEA operated Xpress routes.

- j) **Peak Service** – Xpress service generally operated between 5:30am and 10:00am and between 1pm and 7:45pm.
- k) **Customers Per Trip** – The number of passengers on a trip.

3.0 **Xpress Service Standards and Policies**

This section sets service standards pertaining to:

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

In order to ensure compliance with Title VI regulations, GTEA will monitor the performance of GTEA operated Xpress routes relative to the above standards and policies at least once every three years.

1.) *Trip and Route Productivity Standards*

New GTEA-operated Xpress routes take some time to attract ridership. General economic conditions, fuel costs, service design and the market for the service affect the amount of time required for a new service to achieve acceptable ridership levels. Service standards have been established by year of operation so that new and existing services can be monitored for adequate progress in meeting service productivity standards. Xpress standards for trip and route productivity are shown in Table 1:

Table 1: Xpress Trip and Route Productivity Standards

<i>Years of Operation</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Year 4 & Longer</i>
Minimum Fare Box Recovery Ratio	10%	15%	20%	25%
Minimum Customers per Trip	8	11	14	17

2.) *Trip and Route Productivity Improvement*

The service standards above describe the minimum standards that GTEA will use to identify Xpress underperforming or unproductive service. Routes, route segments, or trips that are performing below at least one of the standards warrant comprehensive evaluation and corrective actions, and strategies that are intended to improve the productivity of specific service components may be pursued. Corrective measures may include the following:

- Increase marketing efforts or information dissemination
- Route redesign or segment rerouting
- Change the frequency of service
- Change the hours of service
- Eliminate unproductive/underutilized service, which may include an entire route, route segment or specific trips operated on a route

3.) *Maximum Vehicle Load*

Xpress commuter transit service typically relies upon travel at relatively high speeds. In order to maximize safety, standees should be avoided. Therefore, GTEA has two standards related to maximum Xpress vehicle load:

- No Xpress trip will include more than 15 standees, in accordance with vehicle capacity limits. In the event the vehicle manufacturer's capacity limit only allows for less than 15 standees, the maximum vehicle load will default to the manufacturer's capacity limit.
- Service modifications will be considered for routes and trips where standing loads occur more often than once per week.

To ensure compliance with these standards, preserving safety and comfort, GTEA will review Xpress route and trip load factors on an ongoing basis and adjust schedules up to twice per year to mitigate overcrowding.

4.) *Vehicle Headway*

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A consistently shorter headway corresponds to more frequent service. GTEA's Xpress vehicle headway standard is related to vehicle load and trip productivity, which are indicators of market demand for the Xpress commuter service. Vehicle headways may vary by route and time of day, based on ridership demand that is driven largely by residential and workplace populations. Table 1 includes route and trip productivity standards, and GTEA will assess productivity according to these standards up to twice per year. GTEA will consider reducing Xpress headways for trips and/or routes that regularly have standing loads (seat capacity load factor greater than 1.0) more often than once per week. Of these trips and/or routes, GTEA will reduce headways first on Xpress routes with the highest vehicle load factors and/or customers per trip. GTEA will consider increasing Xpress headways for trips that fall below the minimum customers per trip standards shown in Table 1 and will increase headways first on trips and/or Xpress routes with the lowest customers per trip and/or farebox recovery ratios.

5.) *On-Time Performance (OTP)*

On-time performance (OTP) is a measure of Xpress trips completed as scheduled. On-time is defined as a bus that departs a scheduled stop between zero and five minutes after the scheduled departure time. GTEA's overall OTP goal for Xpress is for at least 85% of all trips to be on time. To achieve this goal, GTEA has two Xpress OTP service standards:

- Zero Xpress trips shall depart early. In other words, the Xpress system shall achieve 0% of trips "running hot."
- At least 85% of Xpress trips shall depart less than 5 minutes after the scheduled departure time. In other words, there shall be no more than 15% late trips.

GTEA will review available Xpress OTP data on an ongoing basis and adjust schedules up to twice per year.

6.) *Service Availability*

Service availability refers to the geographic distribution of Xpress service within the Xpress service area. Unlike with local transit service, the Xpress service model specializes in commute trips that are longer than 10 miles, with destinations at major employment centers in the metro Atlanta region. The Xpress service area includes 13 counties, however Xpress riders come from more than 40 counties. Many

customers use the service to decrease (but not eliminate) personal driving distance on their commutes. To serve as many potential riders as possible, GTEA will:

- Operate at least one route on each major interstate corridor entering metro Atlanta: I-75 from the north and south, I-85 from the north and south, and I-20 from the east and west.
- Operate at least one route on each of the SRTA-operated managed lane systems in metro Atlanta. For calendar year 2020 this included the managed lane systems along I-85 to the Northeast of metro Atlanta, the I-75 South system in Southwest metro Atlanta, and the Northwest Corridor system along I-75 in the Northwestern part of metro Atlanta.
- Analyze market conditions and financial feasibility to expand service at least once every 10 years. Identify opportunities to increase service on existing routes, and to add service connecting additional residential areas and/or additional job centers.

7.) *Distribution of Transit Amenities*

Transit amenities refer to items of comfort, convenience, and safety that are available to Xpress customers. GTEA has three standards regarding transit amenities at Xpress park and ride lots, addressing three types of lots based on ownership:

- Newly constructed, state-owned Xpress stations shall have the same package of amenities with passenger pavilions, route and schedule displays, benches, waste receptacles, ADA parking spaces, and an equipment room. The design of new and refurbished stations and amenities will follow the requirements outlined in the Xpress Station and Park & Ride Design Manual.
- For leased Xpress lots, the investment in amenities is limited by the very short-term nature of the lease agreements. Since GTEA is required to protect the federal interest for the useful life of its Xpress assets, the construction required at leased lots is limited to passenger shelters and ADA parking spaces. However, GTEA will review other possible transit amenities options with landowners when negotiating lease agreements.
- Interagency lots are owned and controlled by other transit systems or units of local government. The decision on the design and placement of amenities at these locations is controlled by the property owner. GTEA has no requirements for transit amenities at these lots, but GTEA will review available transit amenities options with interagency partners.

As of the effective date of this Program, GTEA has not built any escalators or elevators.

8.) *Vehicle Assignment*

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the Xpress system. As to vehicle assignment, GTEA will:

- Rotate Xpress vehicles at each operating location among routes so that no route in the Xpress system receives vehicles that are on average more than three years older than the system average for all GTEA -operated Xpress routes. For the purpose of assessing compliance with this standard, a vehicle that has been rehabilitated according to the Xpress Transit Asset Management (TAM) Plan is considered new. In other words, vehicle age for this standard shall be calculated based on the model year only for vehicles that have not been rehabilitated and based on the most recent rehabilitation year for those vehicles that have been rehabilitated.

- GTEA may assign particular Xpress vehicle model types that are designed with accessibility options on particular routes in which there is higher demand for specific accessibility options. In this case, the assignment of vehicles with alternative accessibility features will only be based on the vehicle's age relative to the system-wide fleet and not based on vehicle layout.

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Appendix F – Demographic Data Maps

Minority Populations

Using the 2024 American Community Survey 5-Year Estimates Data, GTEA has determined that 61.0% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 7 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 7: Minority Population by County in Xpress Service Area

County	Total Population	Minority Population	Non-Minority Population	Percent Minority Population
Cherokee County	281,032	73,391	207,641	26.1%
Clayton County	298,924	275,512	23,412	92.2%
Cobb County	775,208	410,214	364,994	52.9%
Coweta County	152,852	50,041	102,811	32.7%
DeKalb County	765,351	551,479	213,872	72.1%
Douglas County	147,888	101,968	45,920	68.9%
Fayette County	122,244	54,366	67,878	44.5%
Forsyth County	267,287	102,134	165,153	38.2%
Fulton County	1,076,561	680,232	396,329	63.2%
Gwinnett County	979,864	679,815	300,049	69.4%
Henry County	249,960	169,046	80,914	67.6%
Paulding County	178,909	69,748	109,161	39.0%
Rockdale County	95,281	72,441	22,840	76.0%
GTEA 13-County Jurisdiction	5,391,361	3,290,387	2,100,974	61.0%
Source: American Community Survey 5-Year Estimates (2024), table B03002.				
*Minority population is defined as individuals whose races are not White or Non-Hispanic alone.				

The following maps depicts the census tracts in the 13-county area (Figure 3) with a higher concentration of minority populations than the service area average. Figure 4 presents the same data with the Xpress catchment area shown as an overlay of the Xpress service. The map shows that minority populations are mainly concentrated in areas of Fulton, DeKalb, Clayton, Gwinnett, and Cobb Counties.

Figure 3: Minority Population in Xpress Service Area

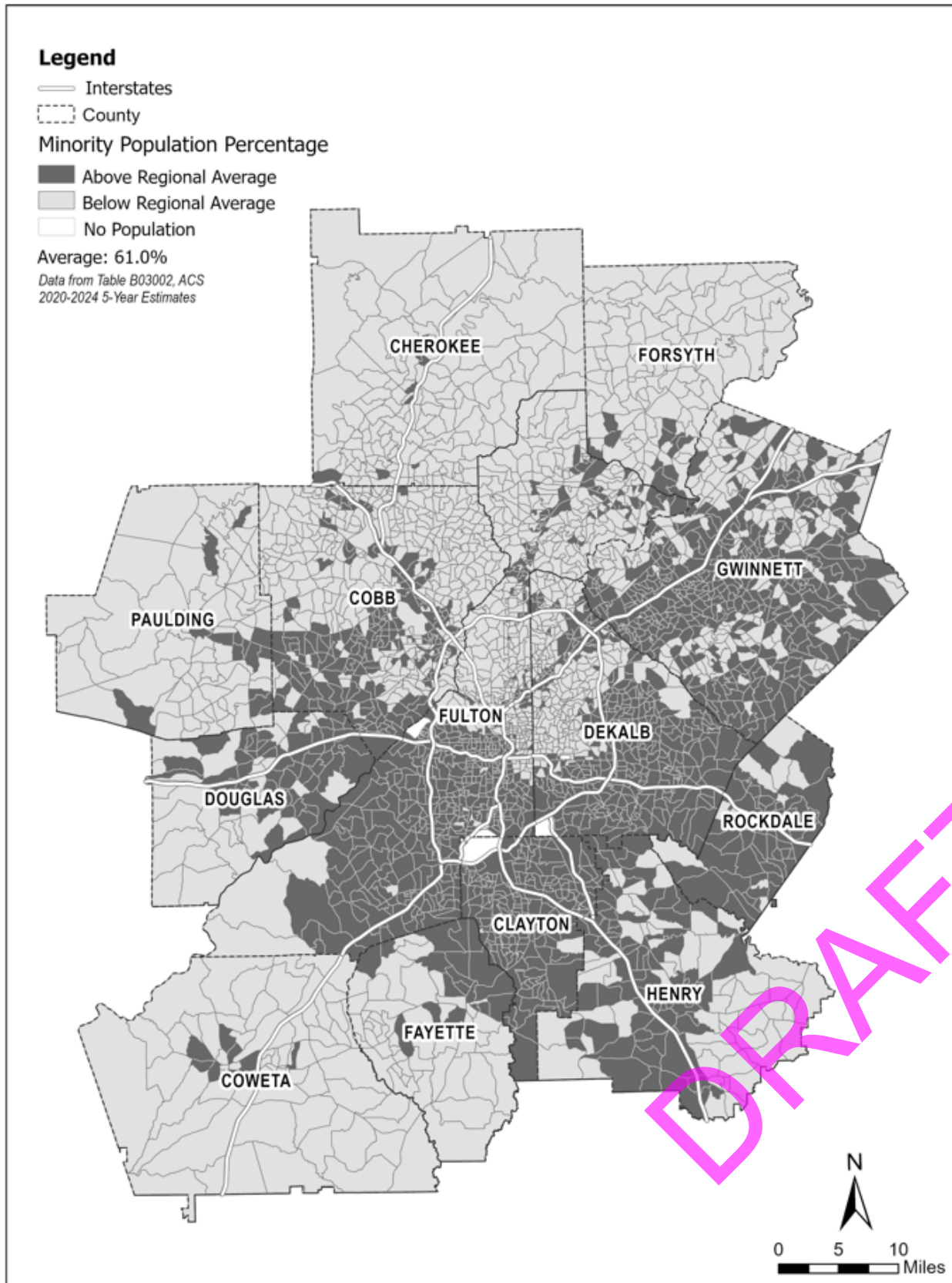
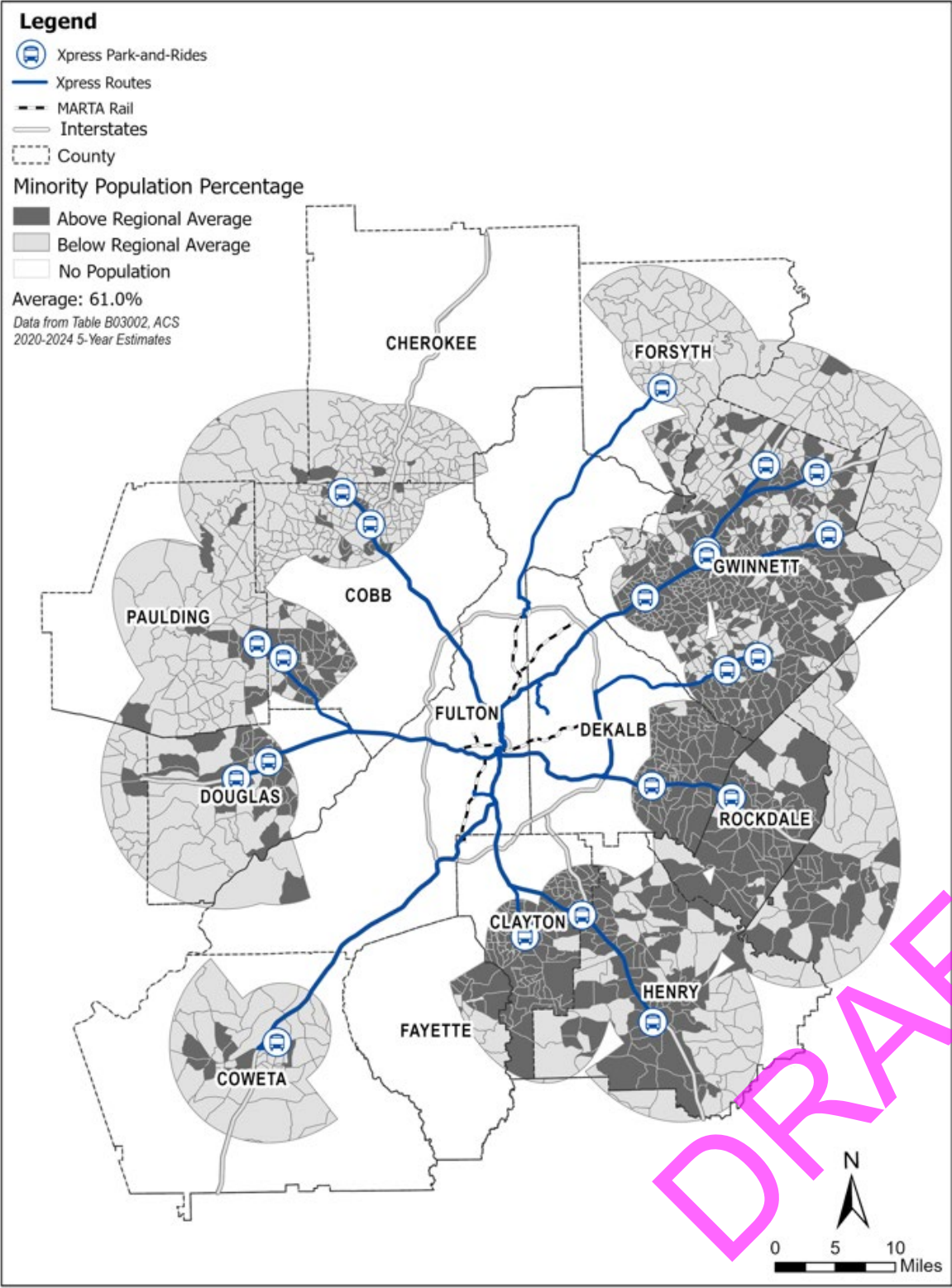


Figure 4: Minority Population in Xpress Catchment Areas



Low-Income Populations

Table 8 presents the low-income population by county within the 13-county area.

Table 8: Low-Income Population by County in 13-County Xpress Service Area

County	Percent Population with low-income (%)
Cherokee County	17.9%
Clayton County	36.9%
Cobb County	19.4%
Coweta County	21.5%
DeKalb County	27.8%
Douglas County	26.0%
Fayette County	17.9%
Forsyth County	12.3%
Fulton County	25.2%
Gwinnett County	23.6%
Henry County	21.1%
Paulding County	17.4%
Rockdale County	25.6%
GTEA 13-County Jurisdiction	23.5%
Source: American Community Survey 5-Year Estimates (2024), table B19001.	
*Low-income population is defined as households making less than \$50,000 per year	

The following maps depicts areas with a higher concentration of low-income populations in the Xpress service area (Figure 4) and catchment areas (Figure 5). Higher concentrations of low-income populations can be found in the central portion of the service area as well as distributed throughout portions of the outlying counties as shown in the catchment areas map.

Figure 4: Low Income Population in Xpress Service Area

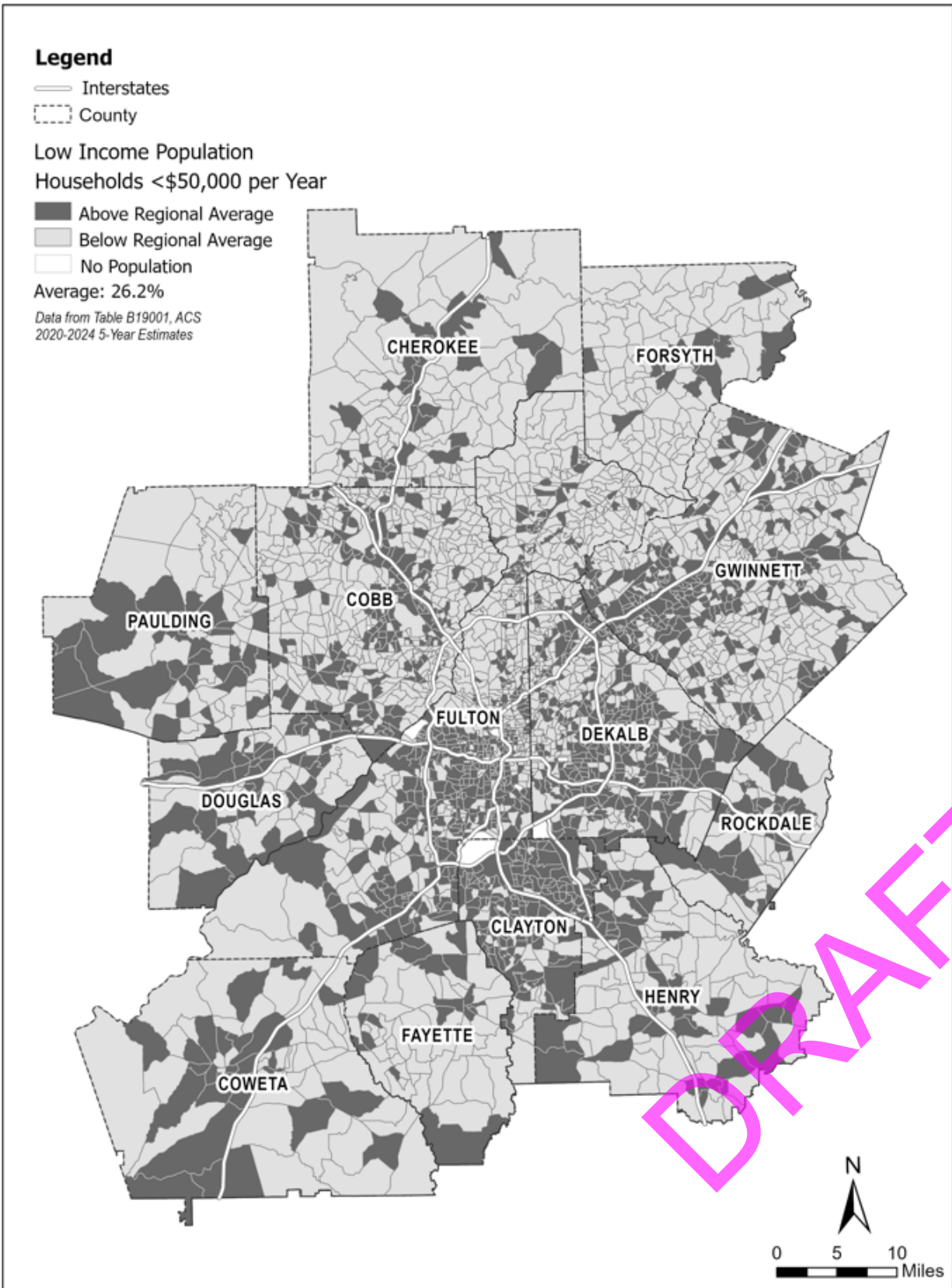
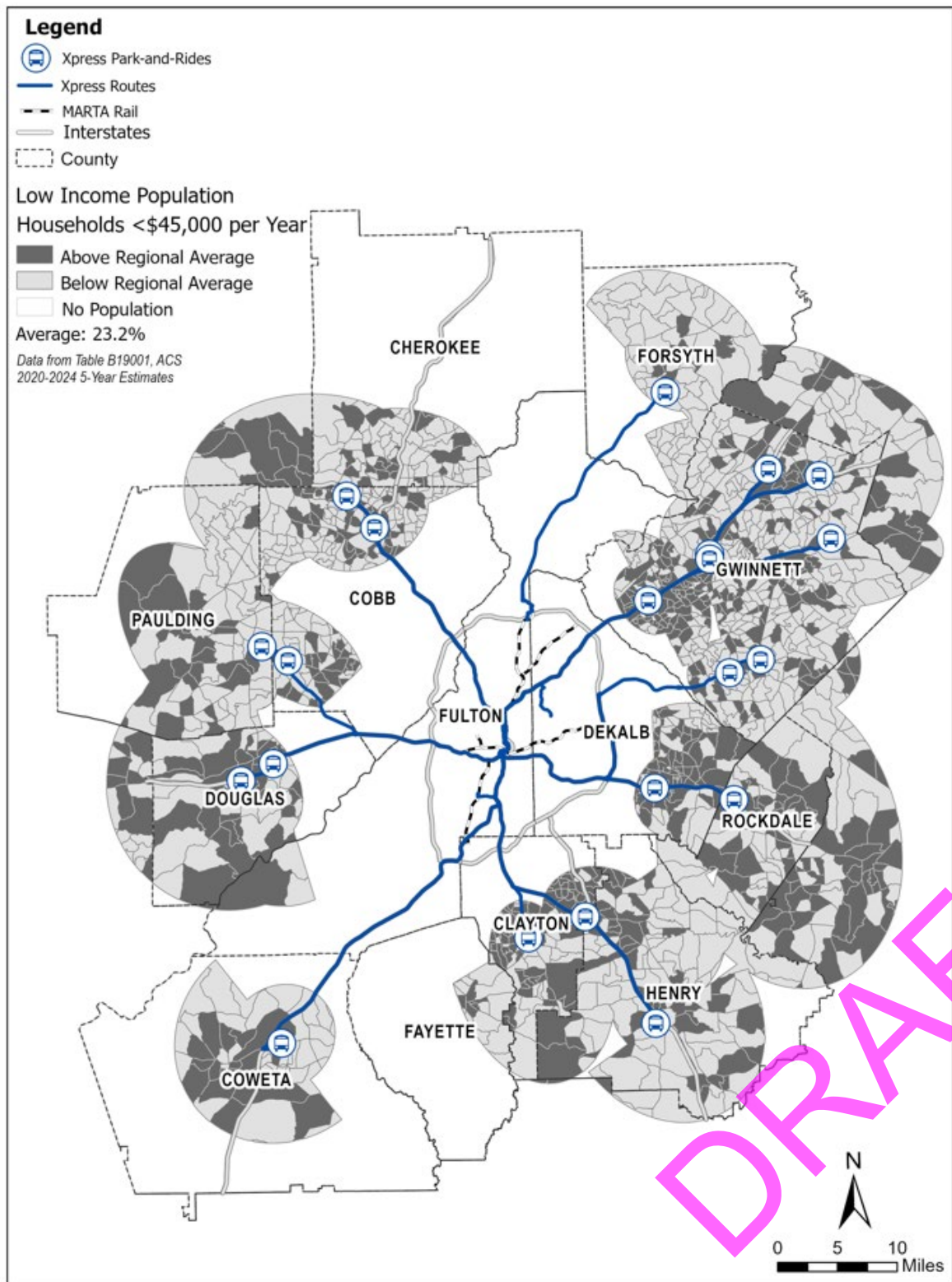


Figure 5: Low Income Population in Xpress Catchment Areas



Limited English Proficiency Populations

The United States Census' most recent American Community Survey (ACS) 5-year estimates (2024) offer a current and reliable estimate of the number, proportion, and geographic distribution of Limited English Proficiency (LEP) individuals in the 13-county area. Specifically, the estimate shows persons 5 years or older where the language spoken at home is not English and English is spoken "Less than very well."

According to the ACS, of the total population over the age of five in the 13-county area (5,078,624):

- Approximately 21.8% (1,111,442) speak a language other than English at home; and
- Approximately 8.3% (420,983) speak English less than "very well"

Table 9: LEP Population by County in Xpress Service Area

County	Total Population of Speaking Age (5 Years and Older)	LEP Population	Non-LEP Population	Percent LEP Population (%)
Cherokee County	265,900	15,404	250,496	5.8%
Clayton County	278,816	27,851	250,965	10.0%
Cobb County	731,550	57,241	674,309	7.8%
Coweta County	144,384	4,945	139,439	3.4%
DeKalb County	715,620	61,561	654,059	8.6%
Douglas County	139,266	5,924	133,342	4.3%
Fayette County	117,018	5,486	111,532	4.7%
Forsyth County	252,873	17,271	235,602	6.8%
Fulton County	1,019,041	51,445	967,596	5.0%
Gwinnett County	920,311	154,707	765,604	16.8%
Henry County	235,743	10,438	225,305	4.4%
Paulding County	168,101	4,254	163,847	2.5%
Rockdale County	90,001	4,456	85,545	5.0%
GTEA 13-Counties Jurisdiction	5,078,624	420,983	4,657,641	8.3%
Source: American Community Survey 5-Year Estimates (2024), table B16004. *LEP population is defined as individuals who are 5 years or older where the language spoken at home is not English and English spoken is less than "Very well."				

The maps below present the same information using the Xpress service area (Figure 6) and catchment areas (Figure 7).

Figure 6: LEP Population by County in Xpress Service Area

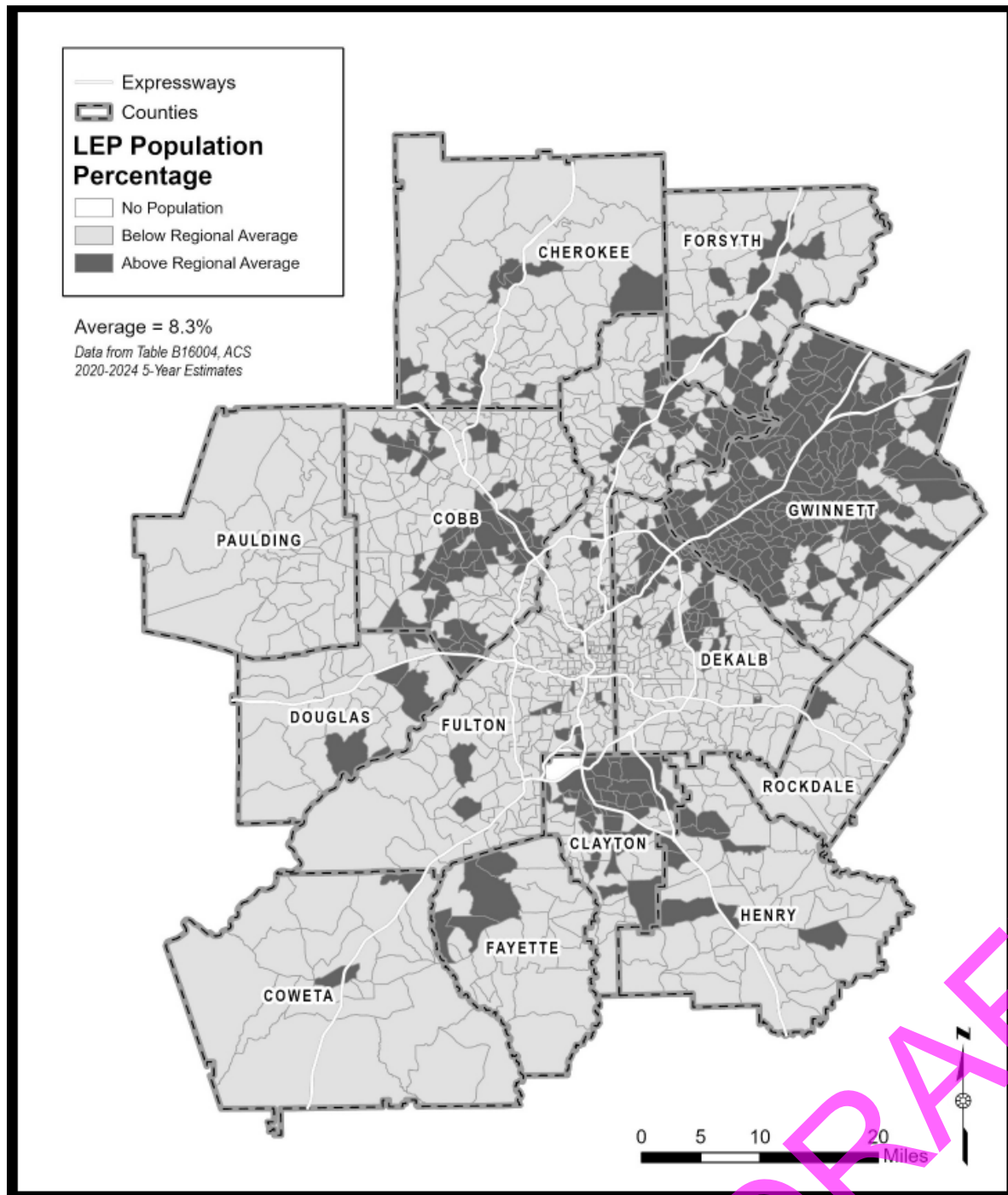
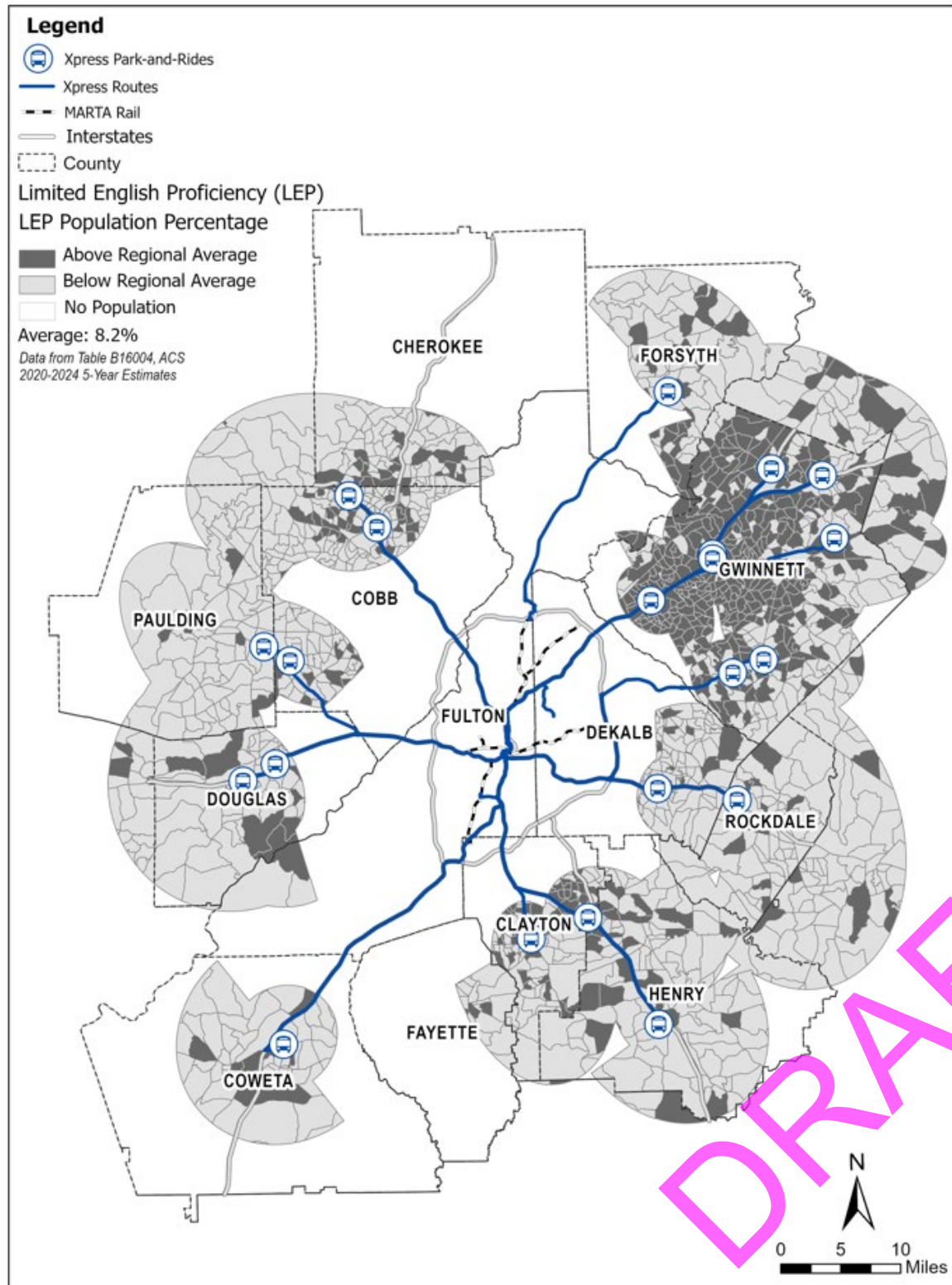


Figure 7: LEP Population by County in Xpress Catchment Areas



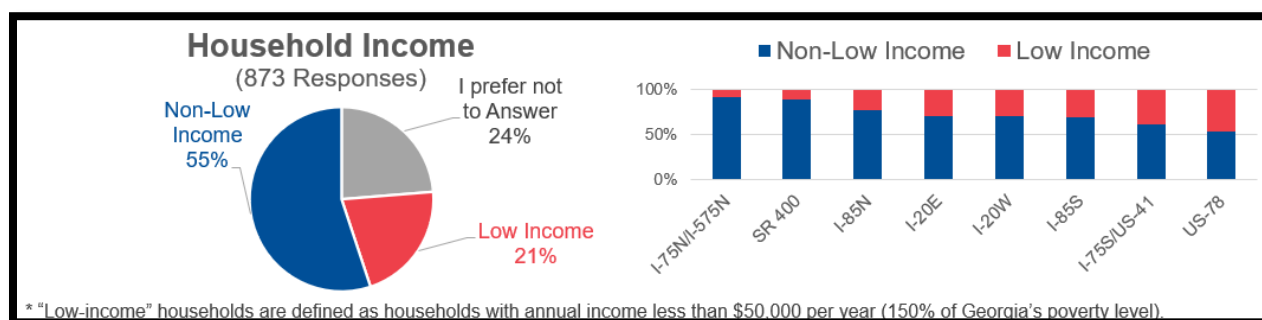
Appendix G – Ridership Demographics (Xpress Catchment Areas)

The demographic summaries presented in Tables G1-G3 in this appendix were calculated based on route catchment areas, developed using demographic data from the 2024 U.S. Census and American Community Survey.

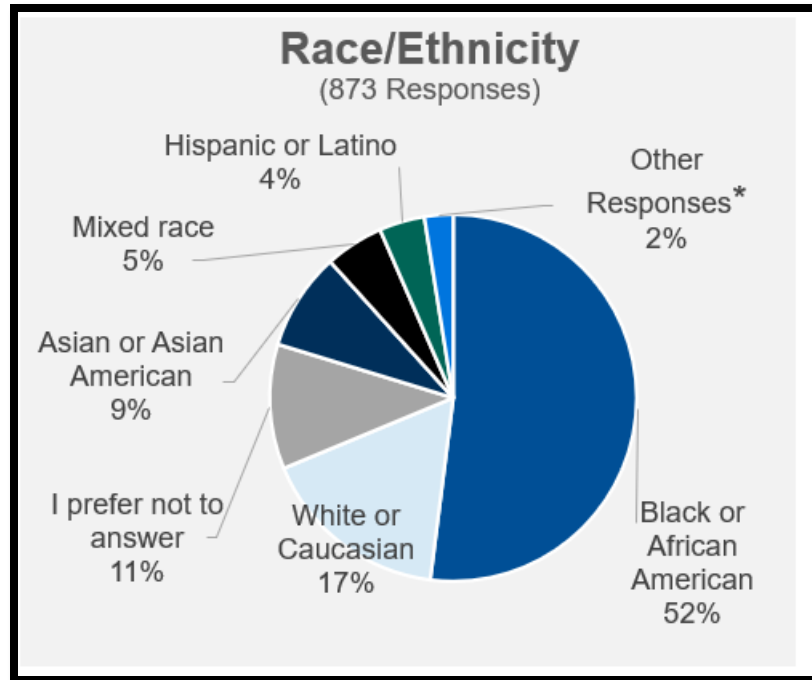
Available Survey Data

The last Xpress onboard survey (OBS) conducted by in-person surveyors was done in 2018, but Xpress ridership has changed dramatically in the subsequent decade. Xpress has conducted more recent customer surveys, in 2021, 2022, 2024 and 2025. Each survey collected demographic and customer opinion information via an online survey link. The 2021 survey was collected through online survey link, and the 2022 survey can be considered an OBS since riders were invited to respond while onboard Xpress.

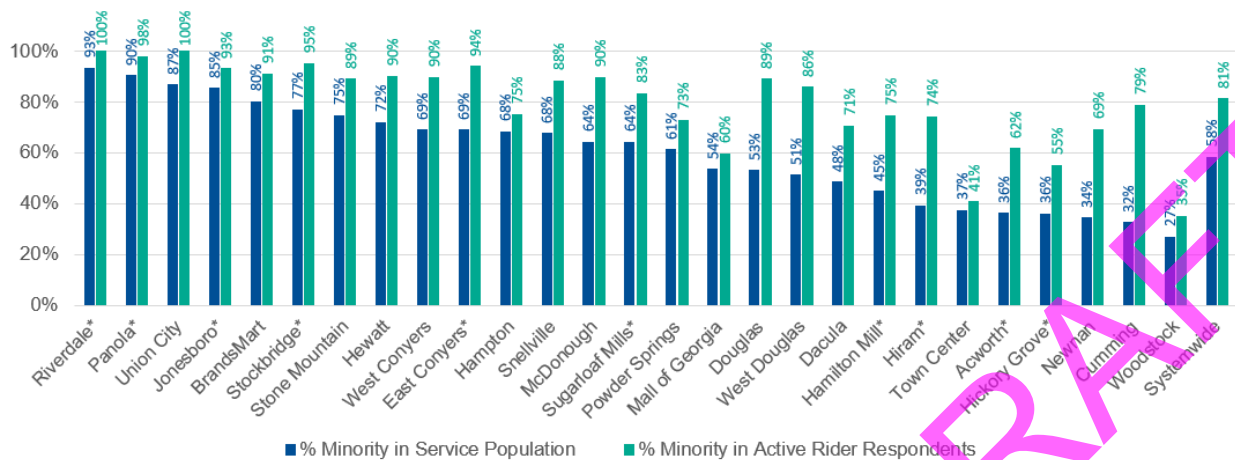
ATL completed a Customer Satisfaction Survey in 2024. The survey was open between April and September and completed by 1,082 Xpress riders, although several demographic questions were optional. Over fifty (55%) of respondents indicated that they were above the regionally developed low-income threshold.



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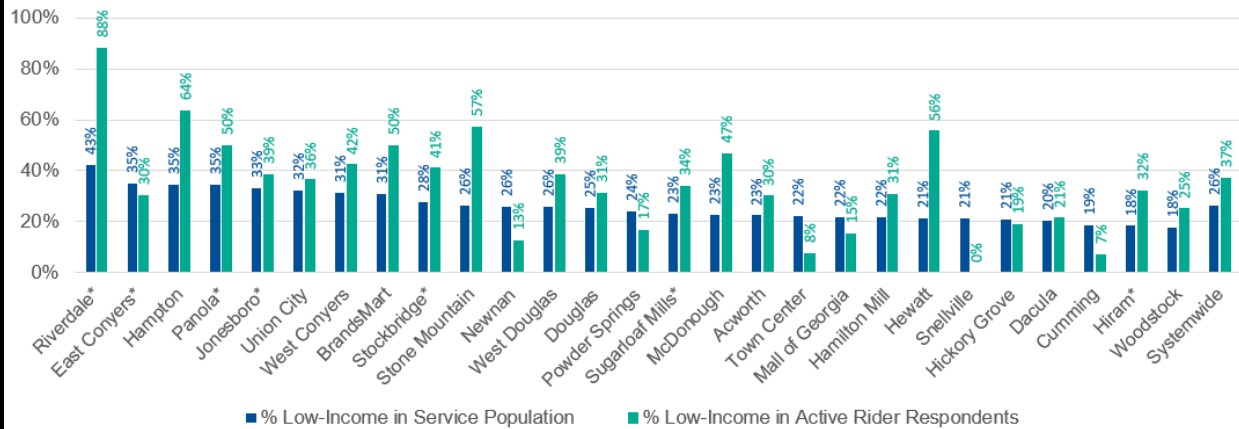


- ▶ % Minority in active rider respondents is higher than the % minority in service population for each P&R.
- ▶ 10 P&R lots with valid race responses reach 90% Confidence Interval.



* P&R lot meets the 90% confidence interval threshold for race response count

- ▶ %Low-income in active rider respondents varies by each P&R compared to the %low-income in service population.
- ▶ 7 P&R lots with valid income responses reach 90% Confidence Interval.



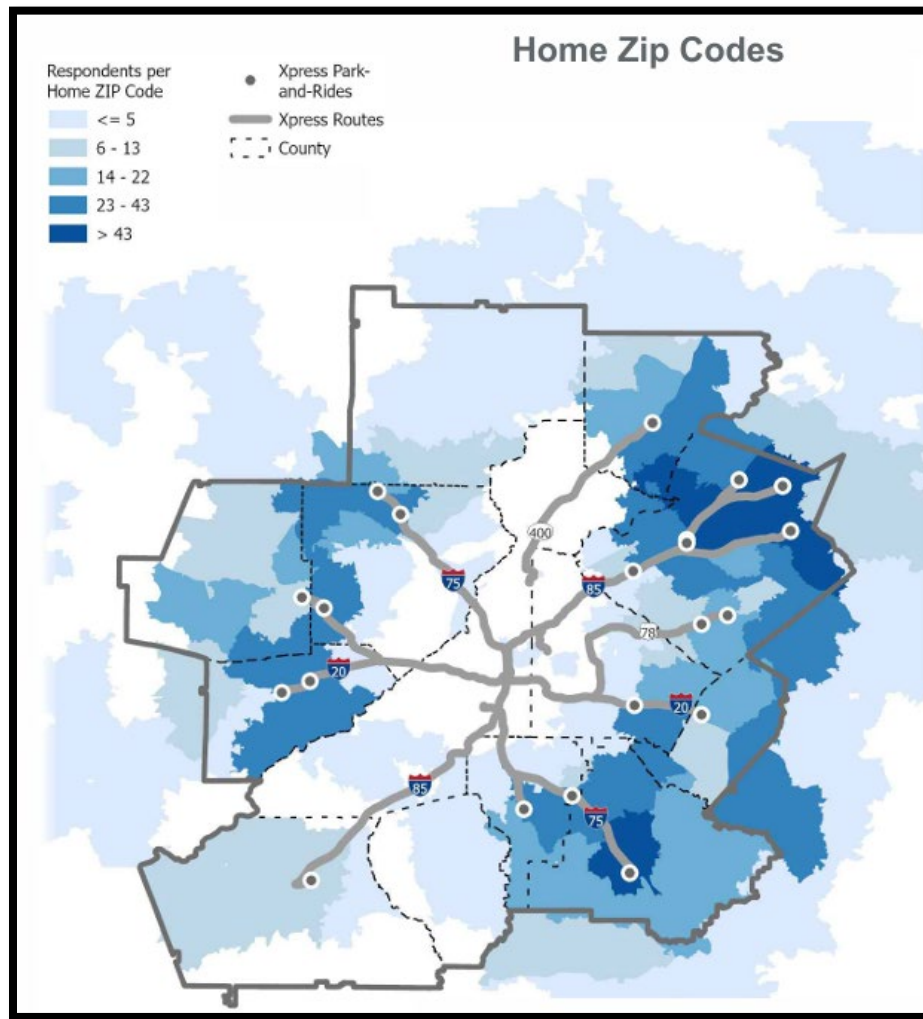
* P&R lot meets the 90% confidence interval threshold for race response count

As part of the Redefine the Ride major service change, the ATL completed another survey between June and August 2024. 750 responses were completed.

In 2025, the ATL conducted the first Customer Satisfaction Survey after the implementation of the Redefine the Ride major service change. The survey opened to the public in October and was completed in December with 1,635 total responses.

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Figure 1: 2025 Customer Satisfaction Survey responses by Home Zip Code



QR code stickers were posted on the seat backs of Xpress coaches, and many respondents took the survey while onboard. However, there are limitations in the demographic data available from this survey because demographic-related questions were optional. Also, although questions regarding race/ethnicity, household income, and language spoken at home were included in the 2021 and 2022 survey instruments, limited English proficiency (LEP) was not assessed. Furthermore, while the 2022 survey, response rates for race/ethnicity and household income demographic questions were statistically valid at a systemwide level (see Table 2 in the main body of this Title VI Program update document), response rates varied dramatically when broken down by Xpress lot and route. A higher response rate, overall, was provided for the residential zip code, which could then be used in a catchment area analysis.

Calculated Catchment Areas

A catchment area is the geographic area from which a facility or location-based service attracts clients or customers. Xpress catchment areas were initially developed to support the 2022 Title VI Service Standards Monitoring effort (see Appendix H). Xpress catchment areas were calculated around park and ride lots using geospatial information systems (GIS) analysis and the home zip code data collected through the 2018 Onboard Customer Survey (OBS).

By the time of this 2026 GTEA Title VI Program adoption post-pandemic Xpress ridership growth appeared to have stabilized, and the sample of home zip codes collected through the most recent 2025 Customer Satisfaction Survey was deemed sufficient to calculate updated catchment areas for most park & ride lots. Therefore, the 2025 Xpress Customer Satisfaction Survey was used to develop the Xpress catchment areas. Two questions were used: the respondent's home ZIP code and the P&R lot where they typically board the Xpress bus in the morning. These identify the respondent's approximate residential location and the P&R they use, respectively.

Route-based catchment areas are calculated by using GIS to merge the lot-based catchment areas for all lots served by each route. A systemwide Xpress catchment area is calculated by merging all route-based catchment areas.

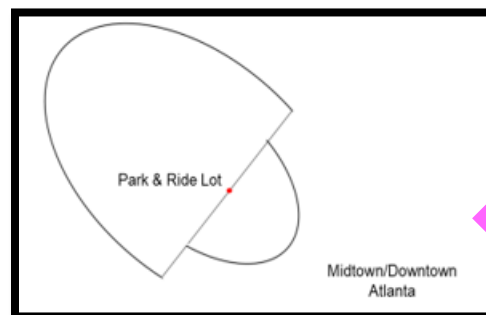
The size and shape of each current P&R lot's catchment area depend on the residential distribution of its commuters, derived from reported home ZIP codes in the 2025 Xpress Customer Satisfaction Survey. Each ZIP code is weighted by the number of survey responses divided by the distance between its centroid and the P&R lot, reflecting that individuals living closer to a lot are more likely to use it.⁴

The weighting formula is provided below:

$$\text{Weight of one zip code area} = \frac{\frac{\text{Number of Responses}}{\text{Distance}}}{\text{Sum of } \frac{\text{Number of Responses}}{\text{Distance}} \text{ for P\&R Lot}}$$

Two standard-deviation ellipses were drawn for each P&R lot from the weighted ZIP codes to capture the directional distribution of responses at one and two standard deviations. A crossline perpendicular to the served highway corridor was drawn through the P&R lot. The inbound half of the one-standard-deviation ellipse and the outbound half of the two-standard-deviation ellipse were merged to define the catchment area for each P&R lot. Route-level catchment areas were formed by merging the catchment areas of all P&R lots serving a given route, accounting for overlaps. As shown in Figure 2, these two half-ellipses were merged to define the final catchment area for each P&R lot.

Figure 2: Xpress Park-and-ride Lot Catchment Area Conceptual Model



⁴ Burns EN, 1979. [Priority rating of potential park-and-ride sites](#). ITEA J. 49, 29–31.

Xpress park and ride catchment-areas have a distinctive shape to correspond with Xpress' current design as a directional, peak-period, park-and-ride-based commuter service. Potential Xpress customers are more likely to utilize a park and ride lot that is 'downstream' in the direction of travel between their home origin and the final destinations of their trips. They are less likely to drive a far distance 'upstream,' or away from their final destinations. Xpress catchment areas are therefore designed to represent a larger area on the 'outer' side (farther away from the travel destination) of each park and ride lot, and a smaller area on the 'inner' side (closer to the destination). For the most recent update to lot-based catchment areas, both a distance-based weighting and a weighting by the number of survey respondents in each home zip code has been utilized to make sure that catchment areas represent the geographic area from which potential customers are most likely to be attracted, and far-away outlier zip codes are excluded from the catchment areas for each lot.

Catchment Area Demographics

Tables G1-G3 provide demographical summaries based on 2024 U.S. Census and American Community Survey for the resident populations within catchment areas for each Xpress route, and the Xpress system as a whole. These demographic summaries can be interpreted as representing the population of current and potential Xpress riders who are likely to be able to access the Xpress service. Table 2 in the main body of this Title VI Program update document indicates that the actual current Xpress ridership is likely to include a higher proportion than the catchment areas of minority riders, and a lower proportion of low-income riders.

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Race and Ethnicity

Table G1 summarizes the race and ethnicity of census populations in each Xpress route catchment area. In the rightmost column, “minority” populations include all individuals except those identified as “white” alone.

Table G1: Race and Ethnicity by Route Catchment Area Population

Race and Ethnicity Proportions by Route Catchment Area Population									
Route	% Hispanic or Latino	% White	% Black or African American	% American Indian and Alaska Native	% Asian	% Native Hawaiian and Other Pacific Islander	% Other race	% Two or more races	% Minority
401	13.4%	67.8%	5.3%	0.1%	8.7%	0.0%	0.6%	4.2%	32.2%
411	19.2%	38.2%	23.2%	0.1%	14.7%	0.0%	0.5%	4.1%	61.8%
412	19.2%	38.2%	23.2%	0.1%	14.7%	0.0%	0.5%	4.1%	61.8%
413	19.1%	38.4%	23.2%	0.1%	14.6%	0.0%	0.5%	4.1%	61.6%
414	19.1%	38.4%	23.2%	0.1%	14.6%	0.0%	0.5%	4.1%	61.6%
415	23.8%	31.3%	24.2%	0.1%	16.1%	0.0%	0.5%	3.9%	68.7%
416	33.1%	25.5%	23.8%	0.1%	13.4%	0.0%	0.6%	3.4%	74.5%
419	15.1%	29.8%	41.2%	0.1%	8.7%	0.0%	0.7%	4.3%	70.2%
426	7.6%	19.6%	65.9%	0.1%	1.3%	0.1%	0.5%	4.9%	80.4%
430	9.6%	24.8%	56.1%	0.1%	4.7%	0.1%	0.7%	3.9%	75.2%
441	11.0%	15.9%	65.0%	0.1%	3.7%	0.1%	0.7%	3.5%	84.1%
453	9.5%	60.0%	23.6%	0.0%	2.8%	0.0%	0.5%	3.6%	40.0%
463	8.6%	46.6%	37.2%	0.1%	1.5%	0.1%	1.2%	4.9%	53.4%
476	12.1%	46.2%	34.4%	0.1%	1.8%	0.1%	0.7%	4.8%	53.8%
484	11.2%	64.2%	14.9%	0.1%	4.3%	0.1%	0.6%	4.7%	35.8%
Systemwide	14.3%	38.7%	34.9%	0.1%	7.1%	0.1%	0.6%	4.3%	61.3%

Source: American Community Survey 5-Year Estimates (2024) applied to route catchment areas

Household Income

Table G2 summarizes the household income levels of census populations in each Xpress route catchment area. In the rightmost column, “low-income” is defined as households earning less than \$50,000 per year.

Table G2: Household Income by Route Catchment Area

Household Income Proportions by Route Catchment Area								
Route	% Less than \$15,000	% \$15,000 to \$30,000	% \$30,000 to \$45,000	% \$45,000 to \$60,000	% \$60,000 to \$75,000	% \$75,000 to \$150,000	% Greater than \$150,000	% Low Income
401	4.0%	5.1%	6.0%	7.7%	5.5%	33.7%	38.0%	15.3%
411	5.3%	6.5%	7.5%	8.8%	9.0%	32.8%	30.0%	20.1%
412	5.3%	6.5%	7.5%	8.8%	9.0%	32.8%	30.0%	20.1%
413	5.3%	6.4%	7.6%	8.8%	9.2%	33.1%	29.8%	20.0%
414	5.3%	6.4%	7.6%	8.8%	9.2%	33.1%	29.8%	20.0%
415	5.5%	7.3%	9.3%	9.7%	9.4%	31.6%	27.2%	22.9%
416	6.1%	9.3%	12.7%	11.8%	11.1%	30.0%	18.8%	29.6%
419	4.5%	5.3%	7.3%	9.2%	10.5%	36.9%	26.4%	17.7%
426	6.9%	9.7%	10.4%	10.6%	11.7%	33.6%	17.1%	27.6%
430	6.3%	7.4%	10.1%	12.3%	11.0%	36.2%	16.7%	24.7%
441	8.0%	8.7%	11.5%	14.1%	10.8%	32.7%	14.1%	28.5%
453	5.7%	7.1%	9.3%	10.6%	8.9%	32.5%	25.8%	23.7%
463	6.1%	7.3%	8.9%	8.6%	9.9%	39.6%	19.6%	23.3%
476	4.8%	5.6%	7.4%	9.1%	10.2%	38.7%	24.3%	18.9%
484	5.1%	6.0%	7.0%	7.4%	8.0%	34.8%	31.7%	18.3%
Systemwide	5.8%	7.3%	8.8%	9.7%	9.7%	34.2%	24.4%	22.6%
Source: American Community Survey 5-Year Estimates (2024) applied to route catchment areas								

DRAFT

Language Spoken at Home

Table G3 summarizes the language spoken at home and the low-English-proficiency (LEP) proportion for ACS populations in each Xpress catchment area.

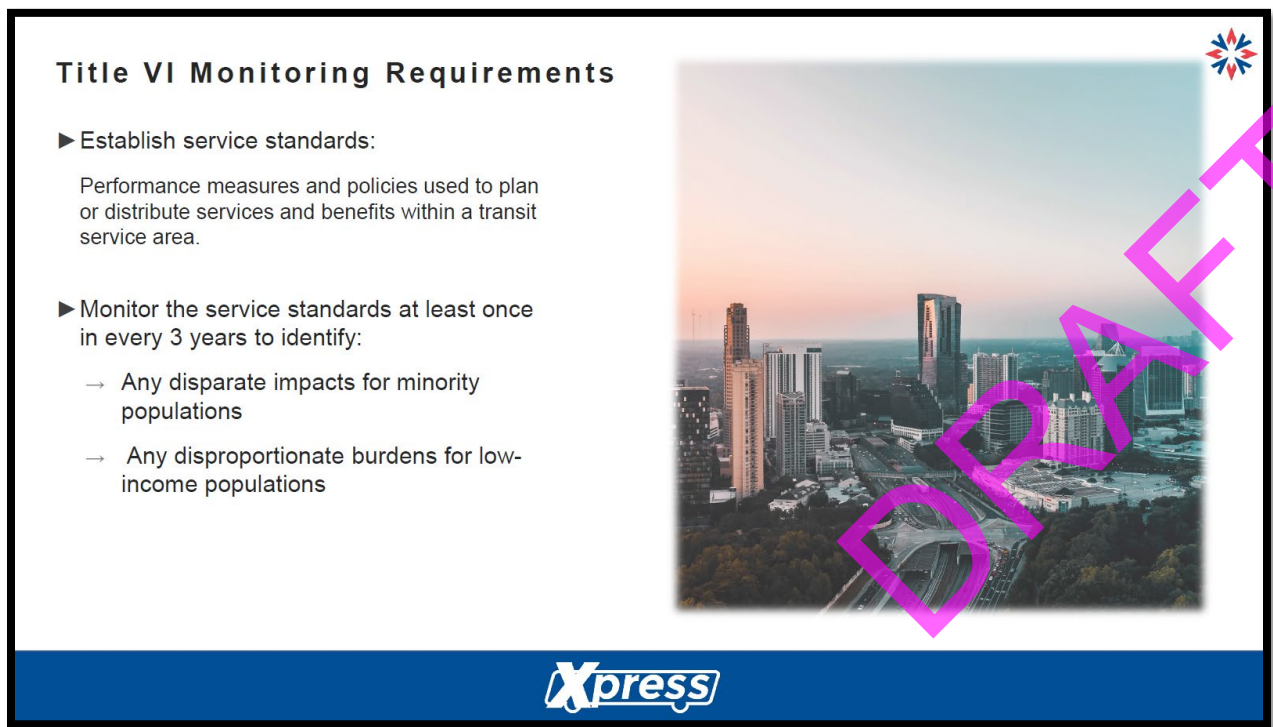
Table G3: Language Spoken at Home by Route Catchment Area

Language Spoken at Home by Route Catchment Area						
Route	% English	% Spanish	% Other Indo-European languages	% Asian and Pacific Island languages	% Other languages	% LEP
401	77.5%	10.6%	5.5%	5.0%	1.4%	7.3%
411	65.7%	16.0%	6.3%	9.4%	2.6%	13.6%
412	65.7%	16.0%	6.3%	9.4%	2.6%	13.6%
413	65.8%	15.9%	6.4%	9.3%	2.6%	13.5%
414	65.8%	15.9%	6.4%	9.3%	2.6%	13.5%
415	59.6%	20.5%	6.6%	10.4%	2.9%	17.5%
416	53.4%	29.5%	4.8%	9.8%	2.6%	23.1%
419	72.0%	12.0%	6.1%	4.9%	5.1%	9.9%
426	89.8%	5.9%	1.6%	0.9%	1.9%	3.1%
430	86.0%	7.2%	2.3%	3.3%	1.2%	6.1%
441	84.7%	9.0%	2.5%	2.5%	1.3%	6.3%
453	89.0%	7.5%	1.3%	2.0%	0.2%	4.2%
463	90.0%	6.2%	1.8%	1.0%	1.0%	2.5%
476	85.5%	8.9%	2.6%	1.0%	2.0%	4.0%
484	84.3%	7.7%	4.5%	1.9%	1.6%	5.3%
Systemwide	78.2%	11.4%	4.0%	4.5%	2.0%	8.5%
Source: American Community Survey 5-Year Estimates (2024) applied to route catchment areas						

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Appendix H – Title VI Service Monitoring ATL Board Presentation, and meeting minutes

Figure 1: ATL Board Presentation – Title VI Service Monitoring



Xpress Title VI Service Standards Monitoring Timeline



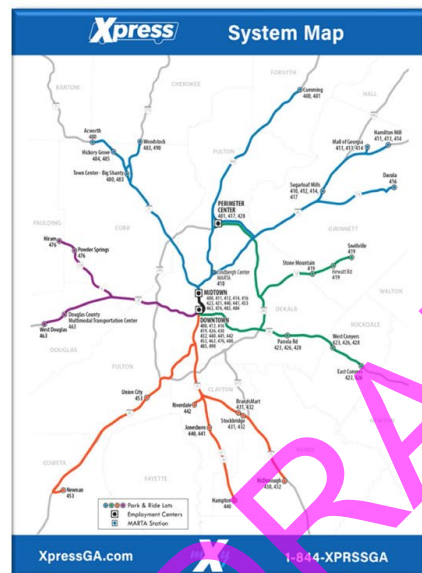
2018	✓ Last Title VI service standards monitoring
2019-2021	❑ Onboard survey delayed due to COVID-19 pandemic
July-September 2022	✓ Ongoing monitoring effort
September 1	ATL Operations Committee First Read
September 30	Final Results Memo for ATL Board Review
October 6	ATL Board Action
October 10	Final Report Submittal to FTA
Within or before 2025	Next Monitoring



Evaluation Approach

1. Identify focus routes and park & ride lots
2. Evaluate each service standard
3. Identify any adverse effects, disparate impacts, or disproportionate burdens on focus routes

Service Standards Categories Adopted 2020	
✓	Service Availability
✓	Trip & Route Productivity – <i>New</i>
✓	Vehicle Headway – <i>New</i>
✓	Maximum Vehicle Load
✓	On-Time Performance
✓	Vehicle Assignment
✓	Distribution of Transit Amenities – <i>New</i>





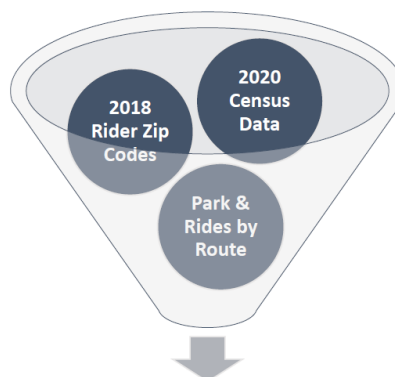
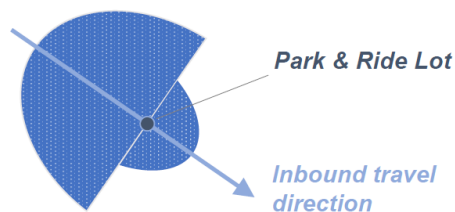
Focus Routes – Demographic Analysis

► Problem:

How to identify “minority routes” and “low-income routes” without current rider demographics?

► Solution: Geospatial Analysis

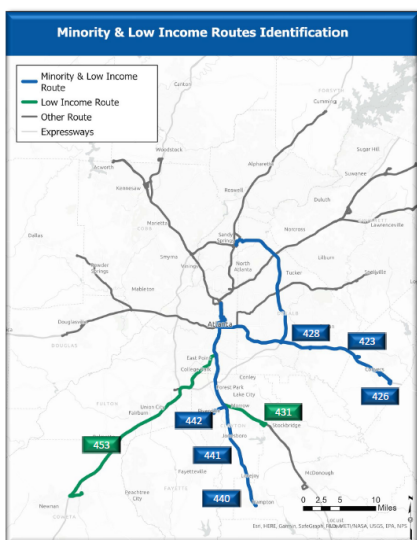
Park & Ride Catchment Area



Catchment Area Demographics by Route



Title VI Focus Routes



► 8 of 27 Routes identified as focus routes:

- “Minority Route” - percentage of minority population in the route catchment area exceeds 15 percentage points above systemwide average
- “Low Income Route” - percentage of low-income population in the route catchment area exceeds 3 percentage points above systemwide average

Focus Type	Route	Minority Percentage	Low Income Percentage
Minority & Low Income	423	78.9% *	35.8%
	426	78.9% *	35.8% *
	428	78.6% *	35.1%
	440	80.1%	30.1%
	441	80.4% *	30.0%
	442	84.2% *	36.9% *
Low Income	431	72.8%	29.0%
	453	53.2%	29.9%
	Systemwide	58.4%	25.7%

* Asterisked routes were also focus-routes in 2018.



Service Availability

► Standard:

Operate at least one route on each major corridor entering metro Atlanta: I-75 from the north and south, I-85 from the north and south, and I-20 from the east and west.

► Monitoring Results:

- ✓ Service standard met.
- ✓ No disparate impact or disproportionate burden.

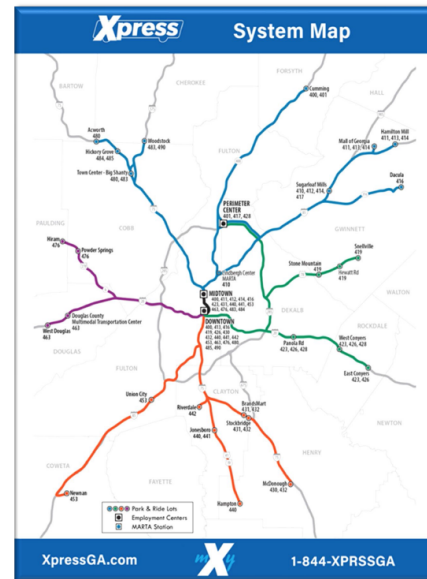
Named Interstates

- I-85 N: 410, 411, 412, 413, 414, 416, 417
- I-85 S: 453
- I-20 E: 423*, 426*, 428*
- I-20 W: 463, 476
- I-75 N: 480, 483, 484, 485, 490
- I-75 S: 430, 431, 432*, 440, 441*, 442*

Other Major Corridors

- US-78: 419*
- US-278: 476
- GA-400: 400, 401
- US-575: 490

* Asterisked routes were focus-routes in 2018. Color coded routes are current focus routes from the 2022 analysis.



New

Trip and Route Productivity

► Purpose:

These standards are focused on the ability of ATL to sustainably operate Xpress, recognizing that new routes take time to attract ridership.

► Standards by Route Age:

- Minimum expected farebox recovery ratio
- Minimum average customers per trip

► Productivity Improvement Policy:

- Corrective measures may be considered for underperforming service.
- Any major service change will require an equity analysis.

Pre-pandemic Service Standards:

Years of Operation	Farebox Recovery Standard	Customers per Trip Standard
Year 1	10%	8
Year 2	15%	11
Year 3	20%	14
Years 4+	25%	17



New

Trip and Route Productivity



► Purpose:

These standards are focused on the ability of ATL to sustainably operate Xpress, recognizing that new routes take time to attract ridership.

► Standards by Route Age:

- Minimum expected farebox recovery ratio
- Minimum average customers per trip

► Productivity Improvement Policy:

- Corrective measures may be considered for underperforming service.
- Any major service change will require an equity analysis.

► Monitoring Results: (Pre-pandemic Standards)

Years of Operation	Minimum Farebox Recovery Standard	Actual FY22 Percent Farebox Recovery	Minimum Customers per Trip Standard	Percent of Trips Meeting Customers per Trip Standards Jan - Jun '22
Year 1	10%	up to 3%	8	up to 6%
Year 2	15%	N/A	11	N/A
Year 3	20%	N/A	14	N/A
Years 4+	25%	up to 11%	17	up to 24%

- ✓ Major service change adopted in July 2021 showed **no disparate impact or disproportionate burden**.
- ✓ Ongoing corrective measures focus on raising awareness.

Note: Subsequent studies may provide recommendations.



Maximum Vehicle Load



► Standard and Policy to Avoid Crowding:

- No Xpress trip shall have more than 15 standees.
- Service modifications will be considered for routes and trips where standing loads occur more often than once per week on average.

► Monitoring Results:

(January 1, 2022 – June 30, 2022)

- ✓ No route violated the standard.
- ✓ **No disparate impact or disproportionate burden.**



New

Vehicle Headway

► Purpose:

This standard uses trip and route productivity standards to determine appropriate service levels including the number of trips by route, and route headways.

► Standards / Policy:

Scheduled headways relate to productivity and demand.

- For crowded routes and trip times, ATL may consider reducing headways.
- For under-productive routes and trip times, ATL may consider increasing headways.

► Current Schedule (July 2021 – Present) → Monitoring Results

Number of Routes by Frequency Category		Average Scheduled Headways	Percent of Trips Meeting Customers per Trip Standards	Title VI Focus Focus Routes Non-Focus
8 Higher Frequency	11 – 18 daily trips	up to 40 minutes	up to 24%	2 Focus Routes 6 Non-Focus
11 Mid-Frequency	6 – 10 daily trips	up to 63 minutes	up to 16%	4 Focus Routes 7 Non-Focus
8 Lower Frequency	4 daily trips	up to 90 minutes	up to 6%	2 Focus Routes 6 Non-Focus

✓ No disparate impact or disproportionate burden.



On-Time Performance (OTP)

► Standard:

- At least 85% of Xpress trips shall depart on time (less than 5 minutes after scheduled departure time). In other words, there shall be no more than 15% late trips.
- Zero trips shall depart early. In other words, the Xpress system shall achieve 0% of trips "running hot."

► Monitoring Results:

January 1, 2022 – June 30, 2022

Route Category	On-Time Trips	Early Trips
Minority Focus	89%	0.2%
Non-Minority	87%	0.6%
Low Income Focus	91%	0.2%
Non-Low-Income	86%	0.6%
Overall	88%	0.5%

✓ No disparate impact or disproportionate burden.



Vehicle Assignment

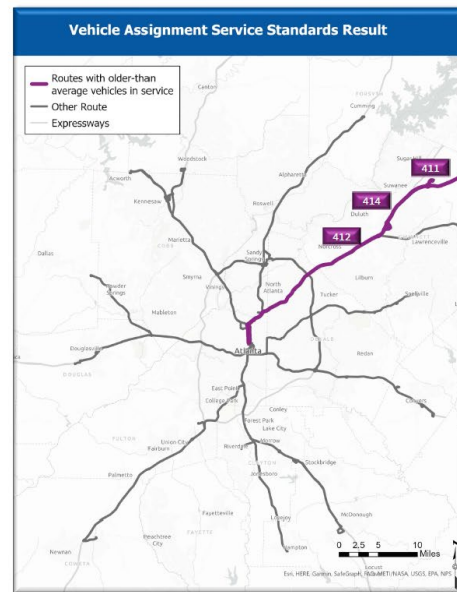
► Standard:

Rotate Xpress vehicles so that no route receives vehicles that are on average more than 3 years older than the average age of vehicles in service

► Monitoring Results:

(July 1, 2021 – June 30, 2022)

- ✓ No routes fell below the standard; three routes had 1-year older than average vehicles.
- ✓ No disparate impact or disproportionate burden.



New

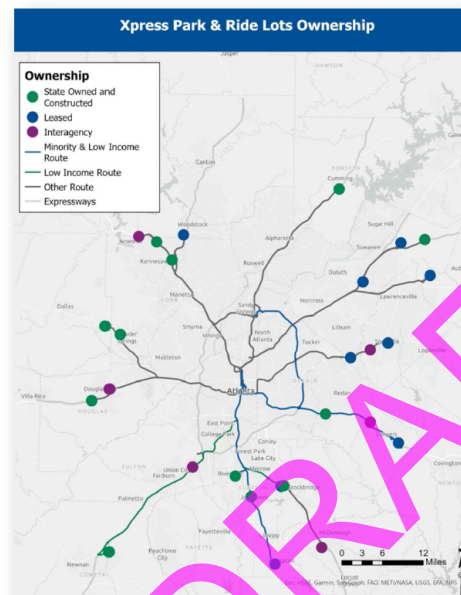
Distribution of Transit Amenities

► Standards Vary by Park & Ride Lot Ownership:

- State Owned & Newly Constructed – Passenger pavilions, route and schedule displays, benches, waste receptacles, ADA parking spaces, *fare pavilion*, and an *equipment room*.
- Leased Lots – Passenger shelter, and ADA parking spaces
- Interagency Lots – No requirements

► Monitoring Results:

- ✓ All park & ride lots currently meet customer-facing amenity standards.
- ✓ No disparate impact or disproportionate burden.



Summary: *no disparate impact or disproportionate burden*



Current Service Standards Categories	Point of View	Required by FTA Circular 4702.1B	Title VI Impacts (2022)	Additional Service Standards Considerations
Service Availability	Customer	✓	-	-
Trip & Route Productivity	Agency*	-	-	✓
Maximum Vehicle Load	Customer	✓	-	✓
Vehicle Headway	Customer*	✓	-	✓
On-Time Performance	Customer	✓	-	✓
Vehicle Assignment	Customer	✓	-	-
Distribution of Transit Amenities	Customer	✓	-	-

Legend: - No, ✓ Yes | * Note: Vehicle headways are related to productivity standards.



Next Steps

► Actions and Submissions

October 6 → ATL Board Action

October 10 → Submittal to FTA

► Follow-up

- Peer review of service standards
- *Xpress Return to Ridership* study
- Potential service adjustments



Questions?



Figure 2: ATL Board meeting minutes – Title VI Service Monitoring

Atlanta-region Transit Link Authority
245 Peachtree Center Ave., Suite 2300
Atlanta, GA 30303

Board Meeting Minutes

October 6, 2022

MEMBERS PRESENT

Charlie Sutlive, Chair
Dan Buyers
Felicia Franklin
Andy Macke
Earl Ehrhart – virtual
Russell McMurry
Howard Mosby
Marci Collier Overstreet
Robb Pitts
Michael Thurmond
Todd Ver Steeg
Chuck Warbington
Tom Weyandt
Paul Radford
Teddy Russell

MEMBERS ABSENT

Charlotte Nash
Michael Thurmond

CALL TO ORDER

The meeting was called to order at 8:35 a.m. and a quorum was confirmed.

APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING

Chair Sutlive called for a motion to approve the minutes for the Board meeting held on September 1, 2022. Mr. Mosby made the motion to approve the minutes, and Mr. Mosby seconded. The Board unanimously approved the minutes.

APPROVAL OF THE BOARD AGENDA

Chair Sutlive called for a motion to approve today's agenda. Mr. Radford made the motion to approve the agenda, Mr. Weyandt seconded. The agenda was unanimously approved.

PUBLIC COMMENT

None.

2023 ATL BOARD CALENDAR

Chair Sutlive called for a motion to approve the 2023 Board Calendar that was previously circulated. Mr. Radford made the motion, and Mr. Macke seconded. The 2023 Board Calendar was approved unanimously.

XPRESS TITLE VI SERVICE STANDARDS MONITORING

Jamie Fischer gave a presentation on the Xpress Title VI Service Standards Monitoring. Title VI Monitoring Requirements include establishing the service standards and monitoring the service standards at least once in every 3 years. Performance measures and policies are used to plan or distribute services and benefits within a transit service area. The evaluation approach is to identify routes and park and ride lots, evaluate each service standard and to identify any adverse effects, disparate impacts, or disproportionate burdens on focus routes. The next monitoring will occur before the end of 2025.

Chair Sutlive called for a motion to approve the Xpress Title VI Service Standards Monitoring. Ms. Franklin made the motion, and Mr. Ehrhart seconded the motion. It was unanimously approved.

PRIORITY INVESTMENT LIST PROJECT PRESENTATIONS

- Douglas County
 - Ron Roberts gave the Board an update on Douglas County's priority investment list projects which include bus shelters and passenger amenities.
- Cobb County
 - Laura Beall gave the Board an update on Cobb County's priority investment list projects which includes three planned multimodal transit centers: Cumberland Transfer Center, Marietta Transfer Center, and South Cobb Transfer Center.
- Gwinnett County Transit
 - China Thomas and Natasha Tyler gave the Board an update on Gwinnett County's priority investment projects which includes Athens Regional Commuter Bus Service, Buford/Sugar Hill/Suwannee Microtransit Zone, Dacula/Lawrenceville Microtransit Zone, Gwinnett Place Transit Center, Lawrenceville Transit Center, and Lawrenceville to Snellville New Local Bus Service.

Annual Report and Audit (ARA)UPDATE

Alanna McKeeman, with FourSquare, gave the Board an ARA update. The ATL's ARA covers all transit planning, funding, and operations in the 13-county ATL region and covers the period from July 1, 2021 – June 30, 2022. Some of the findings are preliminary and still undergoing review by operators. Ridership at the end of FY 2022 was higher than that of the previous summer. Ridership reached its lowest points in January and February 2022, coinciding with the spread of COVID-19 Omicron variant in Georgia. Mid-

day travel at the end of 2021 was the same or slightly higher compared to mid-day travel in 2019. On time performance remained very high for Xpress compared to pre-pandemic levels.

EXECUTIVE DIRECTOR'S REPORT

Heather Aquino discussed the following items:

- National Ambient Air Quality Standards
- Transit Asset Management Plan
- Federal Transit Cluster Audit

NEW BUSINESS

None.

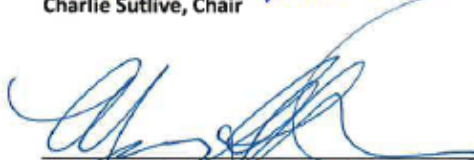
ADJOURNMENT

The meeting adjourned at 9:52 a.m.

APPROVED:


Charlie Sutlive, Chair

APPROVED AS TO FORM:


Merryl Mandus, Chief Legal Officer

ATTEST:


Monica Rossell, Board Liaison

DATE MINUTES APPROVED:

1/5/23

DRAFT

Figure 1: ATL Memorandum – Proposed Redefining the Ride – Xpress Major Service Change

Date: 03/28/2025

The Federal Transit Administration (FTA) Circular 4702.1B¹ mandates that all grantees implement Title VI policies to ensure no individual is excluded from participation in, or denied the benefits of, a program or activity based on race, color, or national origin. As a transit provider operating 50 or more fixed-route vehicles during peak service in an urbanized area with a population of 200,000 or more,

¹ [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Title VI FINAL.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf)

the Atlanta-region Transit Link Authority (ATL) is required to evaluate the impacts of any fare or major service changes on minority and low-income populations.

To comply with Title VI Program reporting requirements, a service equity analysis was conducted to assess the impact of the proposed changes to Xpress service. In accordance with ATL's Title VI Service Standards and Policies, the analysis examines Disparate Impact and Disproportionate Burden to ensure that major service adjustments do not disproportionately affect minority and low-income riders. A Major Service Change Disparate Impact is identified if the minority proportion of the Xpress service population impacted by projected adverse effects exceeds the systemwide minority proportion for the ATL-operated Xpress system by more than 15 percentage points. Similarly, a Major Service Change Disproportionate Burden occurs when adverse effects on low-income passengers exceed systemwide low-income proportion by more than 3 percentage points.

METHODOLOGY

To estimate the impacts of the proposed major service change with available data, the following assumptions were made:

- For Title VI analysis, ATL defines minority riders as those who identify as any race or ethnicity other than "White" alone. The definition of low-income riders aligns with the Atlanta Area Median Income Index², setting the low-income threshold at \$50,000 per household, based on the average household size of Xpress riders.
- The overall Xpress service area shape and size, including each park-and-ride lot service area, is defined based on data gathered from 2024 Xpress Customer Satisfaction Survey. The service area for each Xpress park-and-ride lot is based on the distance current riders typically drive between their homes and the associated Xpress park-and-ride lot.
- To estimate the demographics of the population served by Xpress, the 2019-2023 five-year American Community Survey (ACS) block group level data was overlaid with the service area for each park-and-ride lot and corresponding routes service area.
- The impact of the proposed service changes on minority and low-income populations was assessed based on the population within Xpress route service area and the level of service provided before and after the recommended changes. This evaluation considers shifts in access resulting from park-and-ride closures, route consolidation, and adjustments to trip frequency.

RESULTS OF MAJOR SERVICE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of service area impacts by the proposed major service change, results indicate that the proposed service changes will not result in a disparate impact for minority groups. However, the results do indicate there will be a disproportionate burden for low-income groups.

A detailed analysis of the impacts the major service change will have on minority and low-income groups can be found in **Appendix B: Detailed Results of Title VI Service Equity Analysis**.

² The low-income limit aligns with the [Atlanta Area Median Income \(AMI\) Index](#).

JUSTIFICATION AND MITIGATION

Per ATL's current Title VI Program, if ATL finds that a fare or major service change results in a disproportionate burden on low-income individuals, ATL will implement the changes only if:

- There is a substantial legitimate justification for the proposed service change; and
- There is no feasible alternative that would have a less disproportionate impact on minority or low-income riders but would still accomplish ATL's legitimate program goals.

ATL acknowledges that the proposed service changes result in a disproportionate burden on low-income individuals; however, these changes are being implemented with substantial legitimate justification. Rtr's primary goals are to better align service with current passenger demand and enable ATL to meet FY26 financial obligations based on projected revenues and state-mandated budget reductions. The initial service plan presented to the public during the 30-day public comment period was found to not cause a disparate impact or disproportionate burden. However, additional changes were made to the recommended service plan in response to input from the public and partner jurisdictions. Specifically, feedback received during the public comment period highlighted the need for increased service along I-75 North corridor, and additional trips were incorporated into the plan to address these concerns. Also, the final service changes will consolidate commuter bus services historically offered by county governments into the Xpress service.

The disproportionate impact is primarily attributable to additional service funded through partner jurisdictions, as ATL has coordinated with Cobb County Transit (CobbLinc) and Gwinnett County Transit (Ride Gwinnett) to consolidate regional commuter bus services. This consolidation aims to minimize customer impact and reduce operating expenses overall. These partnerships will enable cost-sharing arrangements that provide enhanced service along I-75 North and I-85 North corridors. Due to the increased Xpress trips in these generally higher-income corridors, the overall distribution of benefits and burdens will slightly favor higher-income Xpress customers. Furthermore, this analysis only considers the Xpress system, and not the overall transit provision or loss of services in the partner jurisdictions across the Atlanta region, which may more equally distribute the burdens of reductions of service. Nevertheless, these changes ultimately benefit low-income populations systemwide by reducing the risk of future service disruptions and preserving transit access for Xpress and partner agency customers.

To mitigate the negative impacts to low-income groups, ATL has implemented several mitigation strategies. Following the 30-day public comment period, additional trips were strategically added along the I-20 East and I-75 South corridors, which include routes identified as low-income focus routes based on 2024 data. These adjustments, made in response to public feedback, demonstrate ATL's commitment to enhancing mobility options for low-income populations who are more likely to rely on public transit. Additionally, while ATL has recommended the closure of park-and-ride locations in low-income areas such as Union City and Riverdale, Xpress riders will have alternative transit options through other regional transit agencies, including MARTA Bus Route 189 at Union City and MARTA Bus Route 196 at Riverdale. Furthermore, ATL is actively promoting the state-supported Vanpool program to provide additional mobility options and ensure continued transit access for low-income populations.

In the future, Xpress will focus outreach and education in low-income population areas where Xpress could anticipate serving a transit need. ATL will also continue to welcome and coordinate with other partner jurisdictions to explore additional options and potential funding sources for increased service along other Xpress routes.

PUBLIC COMMENTS

The ATL held a 30-day public comment period on behalf of its Xpress service from January 13, 2025, through February 12, 2025. The goal of the public comment period was to provide the public with an opportunity to share direct feedback and input into the proposed service change. During the 30-day public comment period, ATL staff notified customers of the public comment period through the ATL and Xpress websites, flyers distributed to customers during park and ride visits, information card "seat drops" on coach buses, social media postings, and text message notifications. The public was directed to leave their comments through a digital comment form, email, or voicemail. In addition, public input was collected during a Virtual Public Meeting hosted via Zoom on January 15, 2025, and an In-Person Public Hearing hosted at ATL headquarters on February 11, 2025.

As of March 26, 2025, 614 responses were collected through the digital comment form. Of the 149 questions asked during the virtual public meeting, 28 included direct feedback on the proposed changes. Three testimonials were collected during the in-person public hearing. ATL also received four voicemails and 14 emails regarding the proposed changes during the 30-day public comment period. Six additional emails were received after the comment period ended. Based on the feedback received, adjustments were made to the proposed service plan to better reflect public input. The primary feedback received was regarding location of Downtown and Midtown Atlanta stops, adjustments to route schedules based on work hours, and transferring to MARTA.

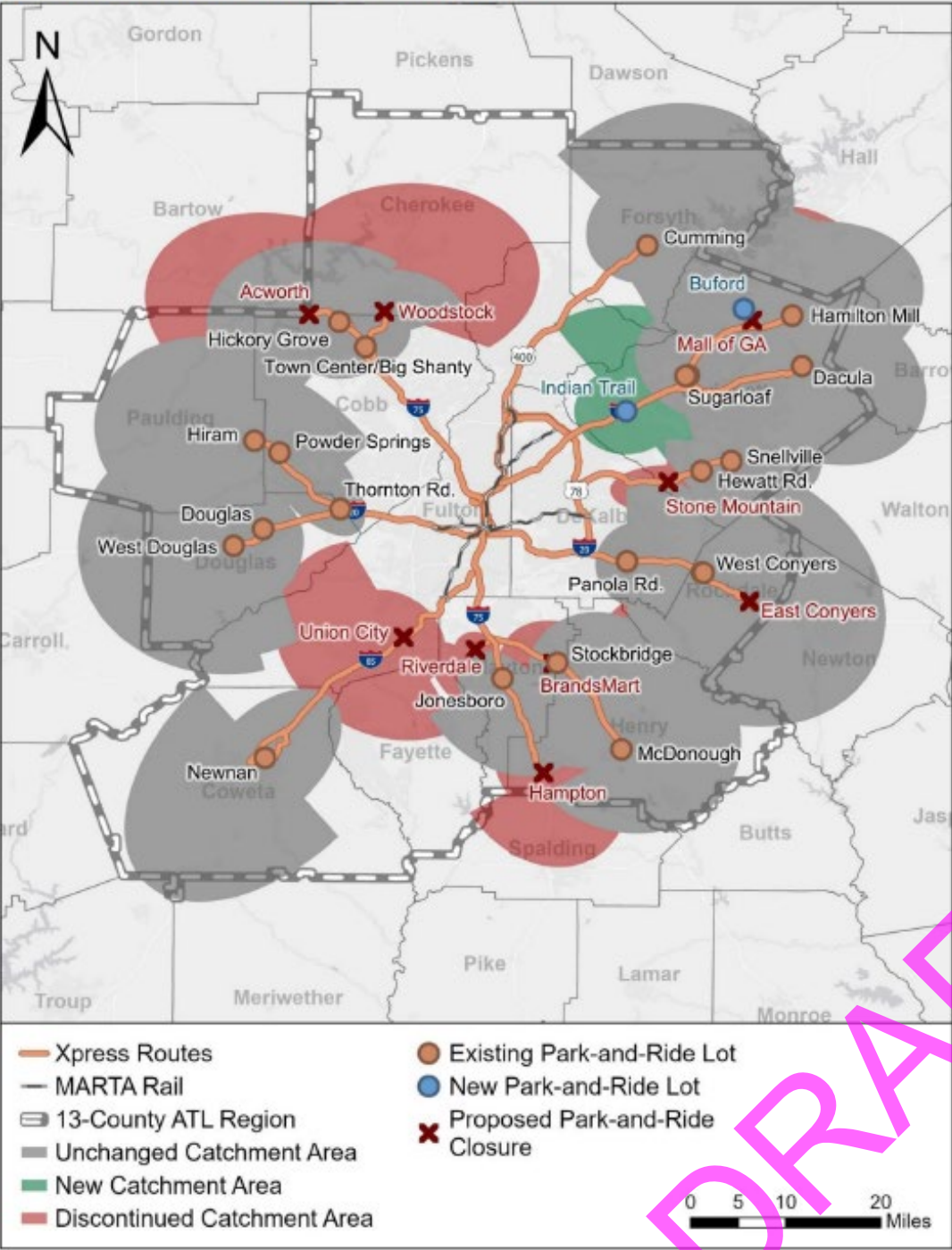
Another key concern raised by the public was the potential impact of federal return-to-office mandates, which may result in increased ridership and possible overcrowding. ATL will continue to monitor ridership trends and make service adjustments as necessary to address emerging demand and ensure a reliable transit experience for Xpress customers.

CONCLUSION

Based on the results of the Title VI analysis, it is the recommendation of ATL staff that the ATL Xpress Operations Committee and the ATL Board of Directors approve the proposed RtR Xpress service changes and mitigation strategies.

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Appendix A: Xpress Service Area Change



Appendix B: Detailed Results of Title VI Service Equity Analysis

To analyze the impacts of the proposed major service change, the 2019–2023 five-year American Community Survey (ACS) block group demographic data was overlaid with each route's service area to estimate the population served by Xpress. The demographic characteristics of the service population in the existing service area was used as a baseline to apply the ATL's Title VI thresholds for measuring the impacts to minority and low-income groups.

Table 1 summarizes the Title VI minority-focused analysis results. The percentage of minority service population in the existing Xpress service is 63%. A Disparate Impact occurs when the projected adverse effects on minority populations exceeds the Xpress system's minority population by more than 15 percentage points, for a systemwide policy threshold of 78%. Based on the proposed changes for RtR, the percentage of impacted population is 71% minority, or 7% lower than the current Xpress threshold. Therefore, the proposed changes do not result in a disparate impact.

Table 1: Title VI Minority Analysis Result

	Percent Minority Population
Percent Minority in Existing Service Area Population (Baseline)	63%
Title VI Threshold	78%
Percent Minority in Impacted Population	71%

Table 2 summarizes the Title VI low-income analysis. The percentage of low-income service population in the existing service area is 26%. A Disproportionate Burden occurs when the projected adverse effects on low-income populations exceed the Xpress system's low-income population by more than three percentage points, for a systemwide policy threshold of 29%. Based on the proposed changes for RtR, the percentage of impacted population is 31% low-income, or 2% higher than the current Xpress threshold. Therefore, the proposed changes result in a disproportionate burden per ATL's current Title VI Program.

Table 2: Title VI Low-Income Analysis Result

	Percent Low-Income Population
Percent Low-Income in Existing Service Area Population (Baseline)	26%
Title VI Threshold	29%
Percent Low-Income in Impacted Population	31%

Table 3 and Table 4 list the minority and low-income focus routes after the service change. Routes 426 and 441 were identified as both minority focus and low-income focus routes. ATL has implemented several mitigation strategies. Following the 30-day public comment period, additional trips were strategically added along these two routes. ATL will continually monitor these routes to address any disparate impact for minority groups and disproportionate burden for low-income groups inherent in the Xpress system.

Table 3: Minority Service Population after the Proposed Service Change

Route	Weekly Trip Count	Total Service Population	Minority Service Population	% Minority
401	26	6,317,610	2,049,164	32%
411	50	35,264,600	20,653,350	59%
412	30	21,158,760	12,392,010	59%
413	30	21,050,550	12,393,900	59%
414	30	21,050,550	12,393,900	59%
415	40	39,102,520	26,129,280	67%
416	30	24,476,040	16,180,560	66%
419	36	8,709,444	6,069,060	70%
426	46	20,579,986	16,040,614	78%
430	36	12,107,952	8,715,420	72%
441	26	4,836,494	4,123,600	85%
453	26	3,274,674	1,126,086	34%
463	26	5,312,320	2,685,930	51%
476	26	9,128,652	4,882,514	53%
484	60	21,123,180	7,505,220	36%
New Systemwide		253,493,332	153,340,608	61%

The bolded route(s) is identified as the Minority Focus Route, as its minority percentage is 15% higher than the systemwide minority percentage

Table 4: Low-Income Service Population after the Proposed Service Change

Route	Weekly Trip Count	Total Service Population	Low-Income Service Population	% Low-Income
401	26	2,142,140	401,986	19%
411	50	11,613,050	2,640,350	23%
412	30	6,967,830	1,584,210	23%
413	30	6,901,860	1,582,530	23%
414	30	6,901,860	1,582,530	23%
415	40	13,138,560	3,391,560	26%
416	30	8,288,430	2,235,900	27%
419	36	2,741,112	589,896	22%
426	46	7,132,208	2,281,094	32%
430	36	4,147,380	1,097,136	26%
441	26	1,680,224	553,852	33%
453	26	1,223,456	317,902	26%
463	26	1,808,456	461,006	25%
476	26	3,162,406	722,176	23%
484	60	7,706,700	1,651,980	21%
New Systemwide		85,555,672	21,094,108	25%

The bolded route(s) is identified as the Low-Income Focus Route, as its low-income percentage is 3% higher than the systemwide low-income percentage

Figure 2: Proposed Redefining the Ride – Xpress Major Service Change Board Presentation



Xpress Operations Committee

Marlene Fosque, Chair

April 3, 2025

Xpress Operations Committee Meeting Thursday, April 3, 2025 Proposed Agenda

- I. Call to Order - Marlene Fosque, Chair
- II. Approval of the Meeting Minutes for February 6, 2025
- III. Approval of the Agenda for April 3, 2025
- IV. Vanpool Program Presentation - Kenya Leatham, Jalisa Brown & Shawn Cook
- V. Redefine the Ride Adoption - Cain Williamson - **Action Item**
- VI. Xpress Operations Contract Renewal - Gail Franklin - **Action Item**
- VII. Fuel Contract Renewal - Darryl Howell - **Action Item**
- VIII. Adjournment



Redefine the Ride Adoption

Cain Williamson
Deputy Executive Director
April 3, 2025

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Agenda

- I. RtR Schedule
- II. Final Service Plan
- III. Public Input Summary
- IV. Ridership Implications
- V. Financial Implications
- VI. Equity Analysis
- VII. Next Steps

What we need from you today...

- Consensus on the final service plan for ATL Board consideration and adoption
- Approval to proceed with rider outreach and implementation activities

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Bottom Line Up Front

- ▶ Estimated impacts of refined final service plan to meet FY25 State appropriations mandate and CARES Act funding expiration
 - **\$9.1M** reduction in annual operating costs
 - **11%** decrease in Farebox Recovery Ratio
- ▶ Ridership decreases, but vehicle utilization increase based on rider impacts
 - **37%** decrease in ridership* due to **49%** reduction in service hours**

*Ridership decrease includes riders shifting to an alternative P&R, transferring to MARTA, route discontinuation, or alternative scheduled time.

**Service hour reduction includes additional service funded by CobbLinc and Ride Gwinnett.



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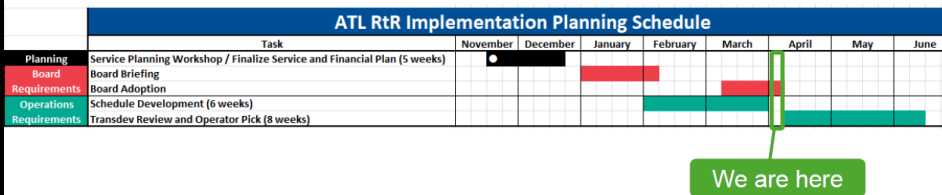
RtR Schedule

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RtR Schedule

- ✓ Developed proposed service plan for the public comment period
- ✓ Completed public input activities per ATL Title VI guidance
- ✓ Revised service plan based on received public input
- ✓ Finalized FY26 financial forecast based on final service plan and ridership
- ✓ Completed Title VI analysis and required mitigation work
- ✓ Designed implementation plan and schedule



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**Final Service
Plan**

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Xpress Service Standards

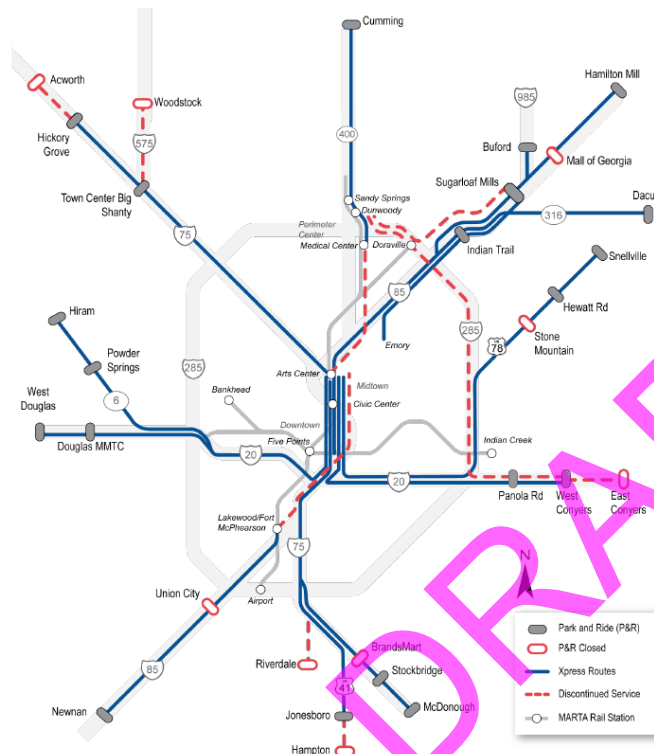
- ▶ Service Standards adopted by ATL Board in FY 2020
- ▶ Purpose: Ensure efficient distribution of service based on minimum customers per trip and route longevity
- ▶ Relevant Standards include
 - Customers Per Trip
 - 8 boardings per trip (Year 1)
 - 17 boardings per trip (Year 4 and longer)
 - Maximum Vehicle Occupancy
 - No more than **15 standees per trip**
 - Standees should not occur more than **once per week on a route or trip**
 - Service Availability
 - **Minimum one route** on each major interstate or SRTA-operated managed lane facility



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Final Service Plan

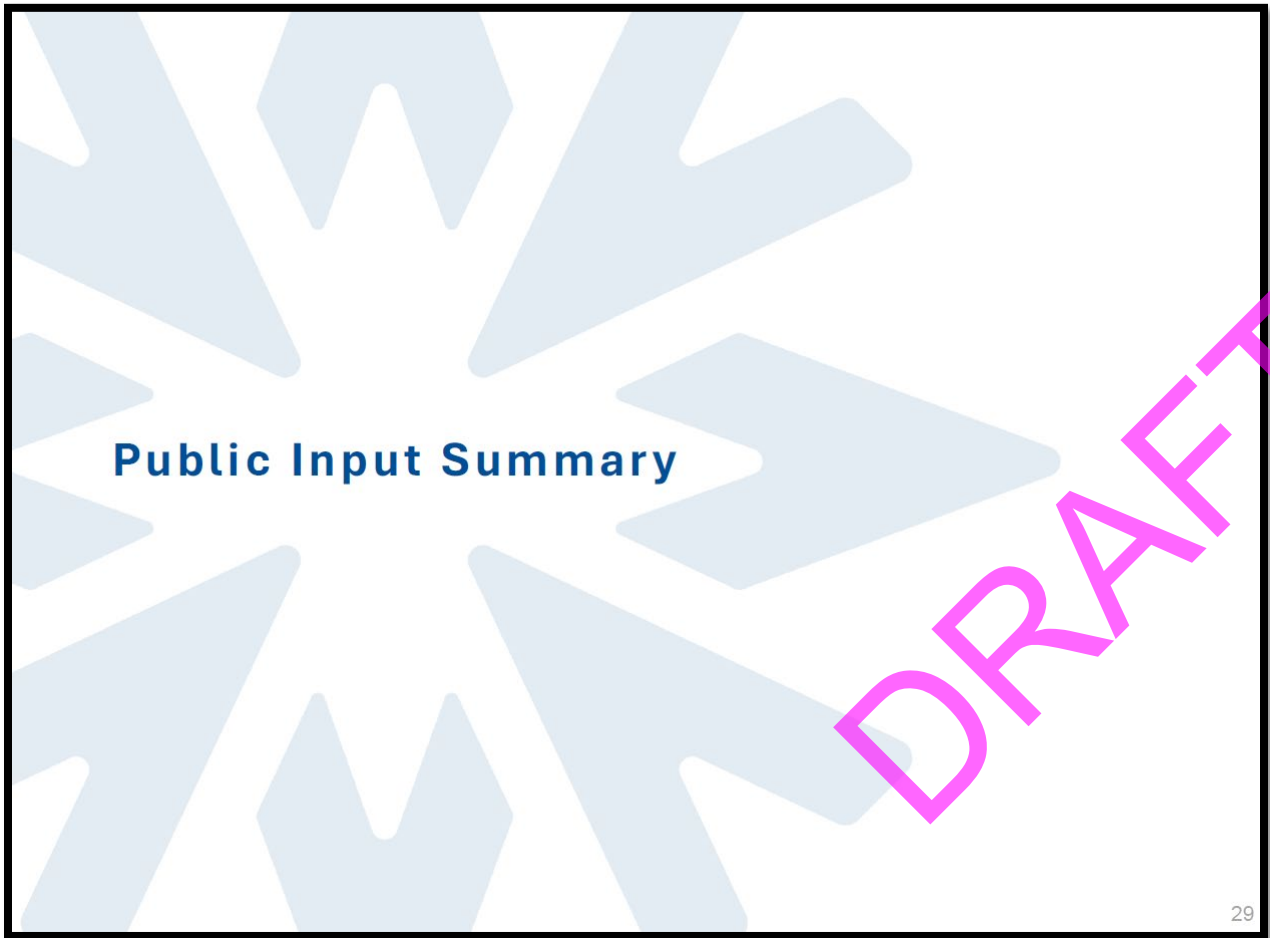
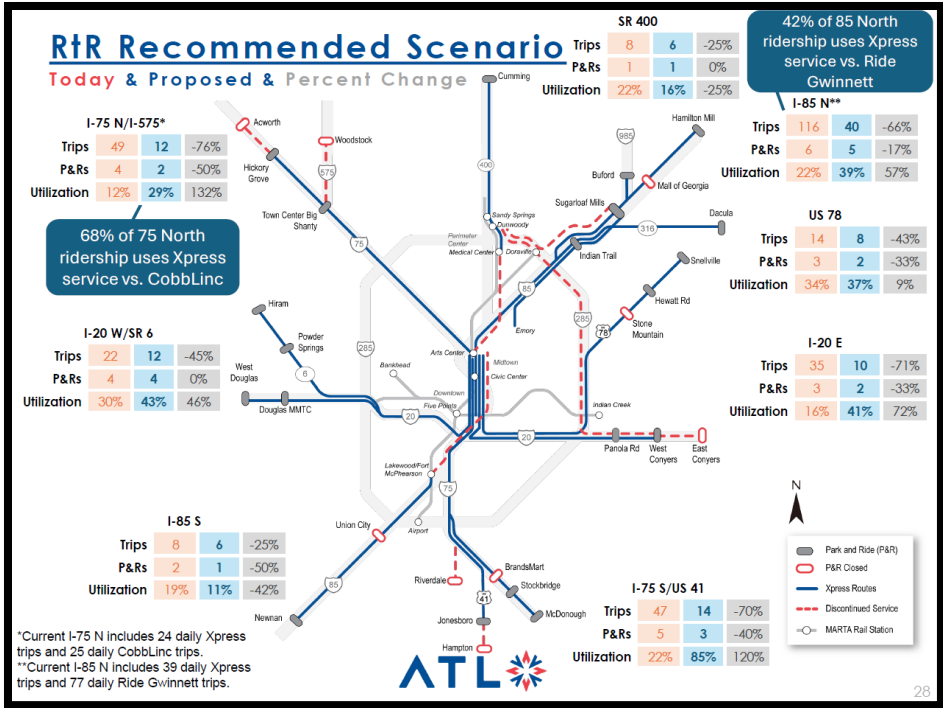
- ▶ Final Recommendations
 - **No routing or P&R changes** from the initial proposed service plan
 - **Additional trips added to I-20 East, I-75 South, and US-78** based on passenger demand and public input received
 - **Cost-sharing** with Ride Gwinnett (I-85 North) and CobbLinc (I-75 North) for additional trips
- ▶ Projected Results
 - Meets **State appropriation mandate**
 - Accounts for **CARES Act expiration**
 - **37% of riders were significantly impacted** by 49% reduction in service hours*
 - **5 of 8 corridors** meet ATL trip service standard
 - **37%** systemwide seat utilization



*Significantly impacted is defined as a rider leaving service due to P&R closure, truncation to MARTA, route discontinuation, or schedule adjustment. Schedule impacts were based on 10, 20, and 30 minute intervals.



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Public Input Summary

► Conducted two public meetings

- Jan 15: **168** attendees at virtual meeting
- Feb 11: **8** attendees at in-person meeting

► Visited 11 P&Rs with proposed closure or truncation to MARTA

- Intercepted over **450** riders at P&Rs
- Provided corridor-specific flyers with proposed changes and schedules to riders

► Digital comment form available on RtR website (Jan 13 – Feb 12)

- **658** total comments
 - **614** received via website
 - **16** received by ATL staff (through email/voicemail)
 - **28** received during the virtual public meeting

Public Meeting Agenda

- About Xpress Service
- Post-Pandemic Realities
- Redefining the Ride (RtR)
- Proposed Service Plan
- Implementation Timeline
- Question & Answer



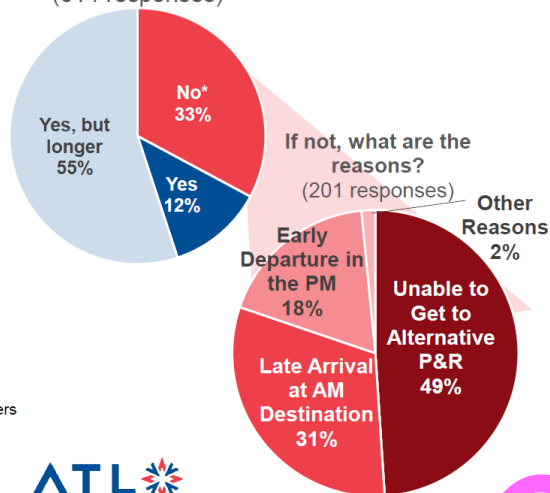
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Public Input Summary

► 658 respondents

- 44% of comments received from P&Rs proposed for closure
- 67% stated they would still be able to use Xpress based on the proposed service plan

With the proposed changes, would you still be able to get where you are going?
(614 responses)



*33% of Xpress ridership is approximately 594 riders



Key Feedback Themes

1. Schedule and trip changes

- Proposed trips occurring too early/too late based on work schedule

2. P&R, route, and bus stop changes

- P&Rs proposed for closure
- Downtown/Midtown stop location inquiries

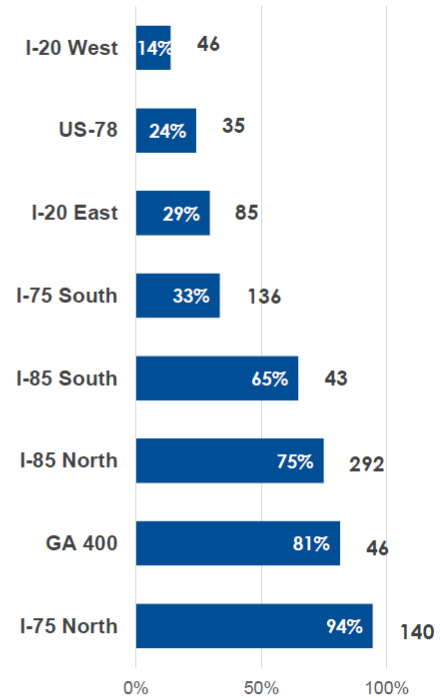
3. Transferring to MARTA

- Fare transfer policy, whether employer passes will still work
- General safety concerns when using MARTA

4. Options for future service adjustments

- Return to the office (RTO) mandates may impact ridership
- Overcrowding on trips based on RTO and fewer trips
- Other cost-reduction strategies, such as vehicle size, fare box, and increased fares

Proposed Service Plan
Comment Rate by Corridor



Response Rate*
(% of Estimated Unique Riders during
January 2025)

*Commentors were able to
select more than one corridor

Analysis assisted by Artificial Intelligence



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Equity Analysis

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Equity Analysis

- ▶ Service equity analysis required by Federal Transit Administration (FTA) and ATL Title VI Program for major service changes
 - Major service change defined as route elimination, route addition, or service change of more than 25% of the revenue hours by route
- ▶ Recommended service plan impacts low-income populations 1.8% above ATL threshold following changes:
 - Added trips along US-78, I-20 East, and I-75 South based on public comment
 - Added trips along I-75 North and I-85 North in partnership with Cobb and Gwinnett

	Recommended Service Plan for ATL Adoption	
	Minority	Low-Income
Existing Service	63.1%	26.3%
Title VI Threshold	78.1%	29.3%
Proposed Service Analysis	71.7%	31.1%
Difference from Threshold	-7.4%	+1.8%



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Equity Analysis

- ▶ “If ATL finds that a fare or major service change results in a disproportionate burden on low-income individuals...ATL will implement the changes only if:
 - There is a substantial legitimate justification for the proposed service change
 - There are no feasible alternatives that would have a less disproportionate impact on minority and/or low-income riders but would still accomplish ATL’s legitimate program goals.”
- ✓ Added trips along I-20 East and I-75 South (designated as low-income routes in ATL’s current Title VI Program)
- ✓ No viable alternative to achieving RtR program goals based on ATL’s projected funding (FY26 budget mandate)
- ✓ Above low-income threshold due to additional service funded by partnering jurisdictions



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Financial Summary

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Financial Implications

- ▶ **\$9.1M** reduction in annual operating costs
- ▶ **11%** decrease in Farebox Recovery Ratio
- ▶ Stable subsidy per passenger trip

	FY24 Baseline	Post-RtR Estimate	Percent Change
Total Cost of Service	\$27,000,000	\$17,800,000	-34%
Fare Revenue	\$1,900,000	\$1,200,000	-37%
Total Subsidy	\$26,100,000	\$16,600,000	-36%
Farebox Recovery Ratio	9%	8%	-11%
Ridership	540,000	345,600	-36%



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Next Steps

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ATL's Next Internal Activities

- ▶ **Operationalize service plan** and provide to service provider (Transdev)
- ▶ **Complete public-facing materials** for release on RtR website
- ▶ **Finalize rider outreach plan** for May public educational campaign



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Upcoming Rider Outreach

► Virtual / Digital resources

- Updates to RtR website following Board adoption of final service plan
- Virtual public meeting in mid-May to begin rider educational campaign
- Social media and other marketing activities beginning in early May

► In-person activities

- Visit all Xpress P&Rs in the week leading up to service implementation
- Additional staffing at P&Rs proposed for closure
- Coordinating with regional partners for staffing at MARTA stations and other high-profile areas
- Seat drops and signs alerting riders of upcoming changes

► Partnership Collaboration

- Georgia Commute Options (GCO) partnering to support riders with
 - Navigating transfers to MARTA rail
 - Finding alternative commute options if requested
- Enterprise will support riders in developing vanpools as needed
- Gwinnett and Cobb counties will discontinue existing commuter service



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Committee Action Item



ACTION ITEM

Staff requests the committee recommend Board adoption of the final Redefine the Ride service plan and direct staff to proceed with rider outreach and implementation activities.

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Thank you
Questions?

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Figure 3: Proposed Redefining the Ride – Xpress Major Service Change Board Resolution, ATL Board of Directors

**RESOLUTION OF THE
ATLANTA-REGION TRANSIT LINK AUTHORITY
ADOPTING THE REDEFINE THE RIDE: XPRESS 2.0 FINAL SERVICE PLAN**

Resolution # 2025.04.03.03

WHEREAS, the pandemic had a significant impact on commuter bus systems nationwide, including ATL Xpress, and Xpress ridership dropped by 90% during the pandemic and has only recovered to approximately 30% of pre-pandemic levels; and

WHEREAS, in the State FY25 budget the Georgia General Assembly approved a \$4 million reduction in the state's contribution to Xpress's budget and directed the ATL to develop a plan to downsize services and increase efficiency to match current demand; and

WHEREAS, since State FY25 budget was adopted, the ATL has worked to develop a final service plan to increase efficiency in the Xpress bus service and rightsize the service to travel demand including specific changes to routes, trip times, and park and ride lots; and

WHEREAS, this thorough and rigorous planning effort included extensive public engagement, a FY26 financial estimate, a complete Title VI analysis, and formulation of an implementation plan and schedule that is operationally viable and meets as many current service standards as possible, considering the present policy directives and budgetary constraints; and

WHEREAS, the final service plan includes cost-sharing agreements with Ride Gwinnett and CobbLinc; and

WHEREAS, this plan will meet the mandate from the Georgia General Assembly;

NOW, THEREFORE, BE IT RESOLVED that the Board adopts the final Xpress Redefine the Ride service plan attached hereto and directs staff to proceed with rider outreach and implementation activities.

APPROVED this 3rd of April 2025.

Atlanta-region Transit Link Authority



Steve Brock
Chairman

Attest:


Chris Brunson
Board Secretary

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HIGHLIGHTED PORTIONS ABOVE IS WHERE THE 9/15/2025 SERVICE EQUITY ANALYSIS DOCUMENTATION
WILL BE INSERTED WHEN COMPLETE

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