



**ATL**

**ATLANTA-REGION  
TRANSIT LINK AUTHORITY**

## **TITLE VI PROGRAM**

**Board Approval Date: March 7, 2019**

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## General Requirements and Guidelines

The Atlanta-region Transit Link Authority (ATL) 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. ATL's Title VI Program follows the requirements of FTA C 4702.1B, dated October 1, 2012, that requires all grantees to implement the general requirements and guidelines established in Chapter III of the Circular.

### 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. ATL 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 ATL's policy that all contractors, subcontractors, and subrecipients shall adopt Title VI policies and shall implement procedures to ensure that ATL's services are provided without discrimination on the basis of race, color, or national origin.

### B. Notice to Public

ATL's *Statement of Policy* shall be published on the ATL website at [ATLTransit.ga.gov](http://ATLTransit.ga.gov). A copy of the *Statement of Policy* is included in **Appendix A** of this document.

### C. Title VI Complaint Procedures and Forms

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

### D. Title VI Investigations, Complaints, and Lawsuits

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

### E. Public Participation Plan

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

### F. Limited English Proficiency Access Plan

ATL 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).

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

## G. ATL Board Structure

The 16 ATL board members consists of one individual appointed by the Governor, two individuals appointed by the Lieutenant Governor, two individuals appointed by the Speaker of the House, and ten individuals elected from the ATL's ten transit districts (see O.C.G.A. § 50-39-4). There are no vacant seats as of January 2019.

Table 1: ATL Board Demographics

2019 Board	Caucasian	African American	Total
Members	12	4	16
Percent	75%	25%	100%

The ATL Board members are appointed in the following manner, per 2017-2018 Regular Session HB 930, 50-39-4:

*“7(a)(1) The board of directors of the authority shall consist of 16 members, ten of whom shall be appointed from the authority districts described in paragraph (2) of this subsection, five of whom shall be appointed as described in paragraph (3) of this subsection, and the commissioner of transportation who shall serve ex officio and be a nonvoting member. The members appointed from such authority districts shall be appointed by a majority vote of a caucus of the members of the House of Representatives and Senate whose respective districts are include any portion of such authority district, the chairpersons of the county board of commissioners whose counties are located within such authority districts, and one mayor from the municipalities located within such authority districts who shall be chosen by a caucus of all mayors from the municipalities located within such authority districts; provided that if any authority district is wholly or partially located within the City of Atlanta, the mayor of the City of Atlanta shall be entitled to his or her own vote in addition to the vote by the mayor outside the limits of such city selected by the caucus of mayors to cast a vote. Each such appointee shall be a resident of the authority district which he or she represents and possess significant experience or expertise in a field that would be beneficial to the accomplishment of the function and purpose of this chapter. No later than December 1, 2018, the respective caucuses appointing board members from the authority districts shall meet and appoint their respective board members of said board of directors. Such meeting shall be called by the chairperson of the board of commissioners from the county with the largest population represented in the authority district.*

*(2)(A) For purposes of appointing members of the board other than those members appointed pursuant to paragraph (3) of this subsection, there are hereby created ten authority districts, which shall be as described in the plan attached to and made part of this Act and further identified as 'Plan: transit-dist-2018 Plan Type: Regional Administrator: H009 User: Gina.'*

*(B) When used in such attachment, the term 'VTD' (voting tabulation district) shall mean and describe the same geographical boundaries as provided in the report of the Bureau of the Census for the United States decennial census of 2010 for the State of Georgia.*

*(C) The separate numeric designations in an authority district description which are underneath a VTD heading shall mean and describe individual Blocks within a VTD as provided in the report of the Bureau of the Census for the United States decennial census of 2010 for the State of Georgia.*

*(D) Any part of the jurisdiction of the authority which is not included in any such authority district described in that attachment shall be included within that authority district contiguous to such part which contains the least population according to the United States decennial census of 2010 for the State of Georgia.*

*(E) Any part of the jurisdiction of the authority which is described in that attachment as being in a particular authority district shall nevertheless not be included within such authority district if such part is not contiguous to such authority district. Such noncontiguous part shall instead be included within that authority district contiguous*

*to such part which contains the least population according to the United States decennial census of 2010 for the State of Georgia.*

*(F) Except as otherwise provided in the description of any authority district, whenever the description of such authority district refers to a named city, it shall mean the geographical boundaries of that city as shown on the census map for the United States decennial census of 2010 for the State of Georgia.*

*(G) The plan attached shall be reviewed by the Senate and House Transportation Committees after the report of the Bureau of the Census for the United States decennial census of 2020 or any future such census.*

*(3) The Lieutenant Governor and Speaker of the House of Representatives shall each appoint two board members. The Governor shall appoint one member who shall serve as the chairperson.*

*(b) All members of the board and their successors shall each be appointed for terms of four years, except that those members appointed from odd-numbered authority districts shall each serve an initial term of two years. After such initial two-year term, that caucus which appointed such member for such initial term shall appoint successors thereto for terms of office of four years. All members of the board shall serve until the appointment and qualification of a successor except as otherwise provided in this Code section. Other than the commissioner of transportation, no person holding any other office of profit or trust under the state shall serve upon the board. The chairperson of the board of directors 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.*

*(c) All successors shall be appointed in the same manner as original appointments. Vacancies in office shall be filled in the same manner as 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."*

## H. Subrecipient Assistance and Monitoring

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

The ATL has no subrecipients at this time.

## I. Determination of Site

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

## J. ATL Title VI Program Adoption

The ATL's Board plans to take action on the proposed ATL Title VI Program during their regularly scheduled meeting on March 7, 2019. ATL will be conducting a public comment period from January 28, 2019 through February 26, 2019 and a public hearing on February 13, 2019.

This section will be updated to reflect outcomes of the public engagement process and action taken by the ATL Board.

## Appendix A – Notice to Public

# THE ATLANTA-REGION TRANSIT LINK 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 Atlanta-region Transit Link Authority (ATL) 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.

ATL's subrecipients and contractors 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 ATL or to 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.

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

ATL Civil Rights Officer  
Atlanta-region Transit Link Authority  
245 Peachtree Center Ave., Suite 2200  
Atlanta, GA 30303  
[TitleVI@atltransit.ga.gov](mailto:TitleVI@atltransit.ga.gov)  
(404) 893-2100

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

如果需要在另一种语言的信息 · 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.

## 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 Atlanta-region Transit Link Authority (ATL) 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 [atltransit.ga.gov/accessibility-and-civil-rights](http://atltransit.ga.gov/accessibility-and-civil-rights) or request the complaint form from ATL'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, ATL 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:

ATL Civil Rights Officer  
Atlanta-region Transit Link Authority.  
245 Peachtree Center Ave NE, Suite 2200  
Atlanta, GA 30303  
Phone: (404) 893-2100  
[TitleVI@atltransit.ga.gov](mailto:TitleVI@atltransit.ga.gov)

The ATL Civil Rights Officer must acknowledge receipt of an emailed complaint within one working day of receiving it. The complainant should contact ATL's Civil Rights Officer if an



acknowledgment was not received within this time period to confirm whether ATL'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 ATL Civil Rights Officer will begin an investigation within fifteen (15) working days of receipt of a complaint.
- 5. The ATL 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 ATL Civil Rights Officer may administratively close the complaint.
- 6. The ATL 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 ATL Civil Rights Officer will advise complainants of their appeal rights to the appropriate federal agency.
- 10. The ATL 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.**

**如果需要在另一种 语言的信息 · 请联系 (404) 893-2100。**

**정보가다른언어로필요한경우 (404) 893-2100 로문의바랍니다.**

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

## 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:

ATL Civil Rights Officer  
Atlanta-region Transit Link Authority  
245 Peachtree Center Ave NE, Suite 2200  
Atlanta, GA 30303  
Phone: (404) 893-2100  
TitleVI@atltransit.ga.gov

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  
☐ Sex

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.

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Complainant

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

如果需要在另一种语言的信息，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.

## Appendix C – Public Participation Plan

### **Atlanta-region Transit Link Authority Public Involvement/Public Participation Plan**

The Atlanta-region Transit Link Authority (ATL) is a Federal Transit Administration (FTA) grant recipient and this Public Participation Plan has been adopted by the ATL Board. The ATL is an Authority established by state law and its Board members are appointed by the Governor, Lieutenant Governor, Speaker of the House, or elected by one of the ten transit districts included within the 13 county ATL jurisdiction.

#### **I. Goals and Guiding Principles**

The Atlanta-region Transit Link Authority (ATL) is strongly committed to seeking and encouraging public participation in the planning process. The overall goal of the ATL 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. ATL 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 ATL'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 ATL Public Participation Plan is intended to document ATL's activities to meet these federal requirements.

### **III. Public Participation Plan Goals**

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

### **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 median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "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.

**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.
- 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

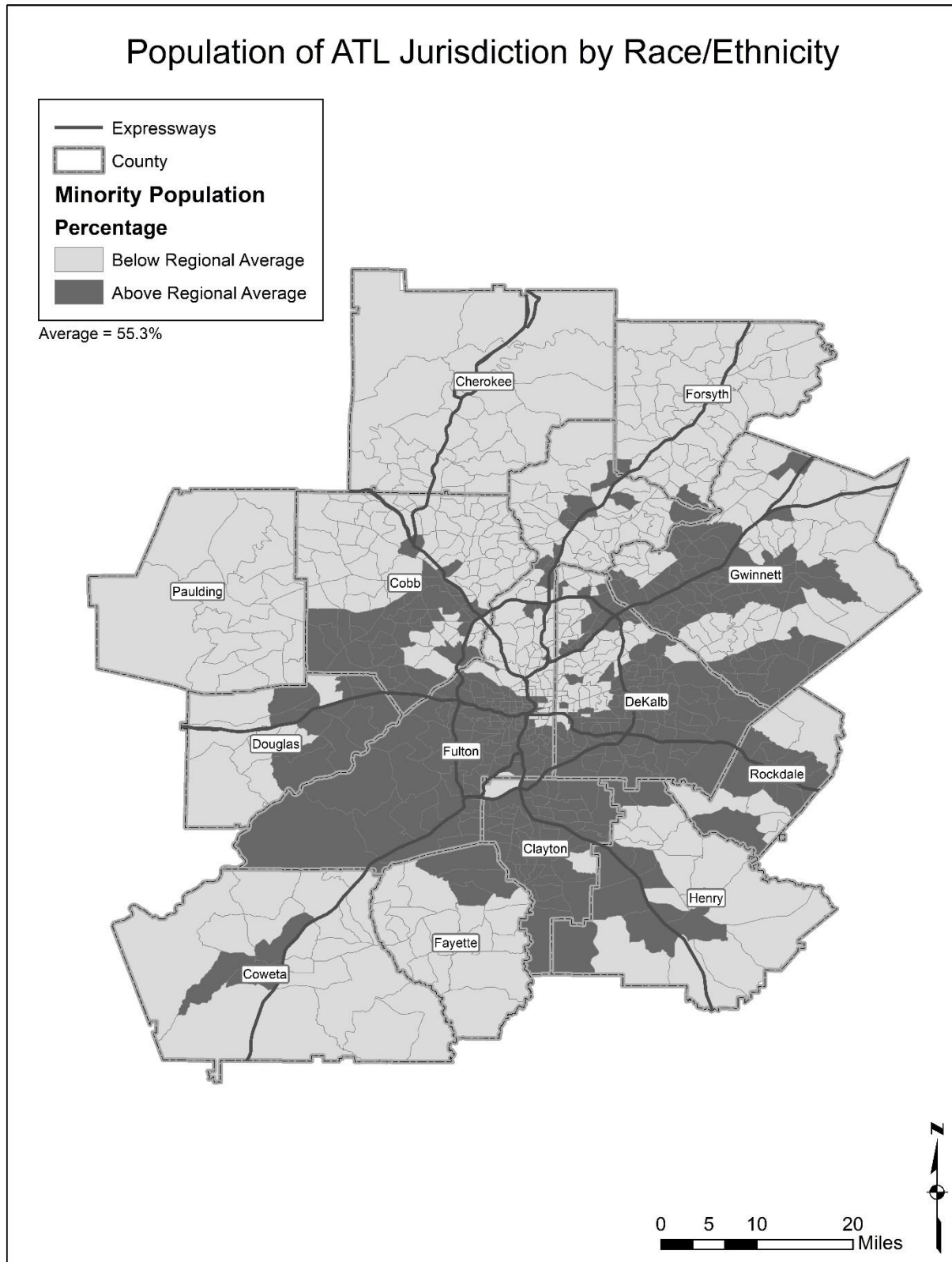
Using the American Community Survey 5-year estimates (2017), ATL has determined that 55.3% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 2 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 2: Minority Population by County in ATL 13-County Area

County	Total Population	Minority Population	Non-Minority Population	Percent Minority Population
Cherokee	235,896	47,517	188,379	20.1%
Clayton	274,150	243,315	30,835	88.8%
Cobb	739,072	346,841	392,231	46.9%
Coweta	138,015	39,268	98,747	28.5%
DeKalb	736,066	522,223	213,843	70.9%
Douglas	140,152	79,357	60,795	56.6%
Fayette	110,306	39,552	70,754	35.9%
Forsyth	211,300	53,040	158,260	25.1%
Fulton	1,010,420	607,070	403,350	60.1%
Gwinnett	889,954	540,520	349,434	60.7%
Henry	217,506	115,854	101,652	53.3%
Paulding	152,399	41,100	111,299	27.0%
Rockdale	88,482	57,889	30,593	65.4%
<b>Total 13-counties</b>	<b>4,943,718</b>	<b>2,733,546</b>	<b>2,210,172</b>	<b>55.3%</b>
Source: American Community Survey 5-Year Estimates, 2017, data table DP05				
*Minority Population is defined as individuals whose race is not White Non-Hispanic				

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

Figure 1: Minority Population in ATL 13-County Area



## A. Low-Income Populations

Table 3 presents the low-income population by county within the 13-county area.

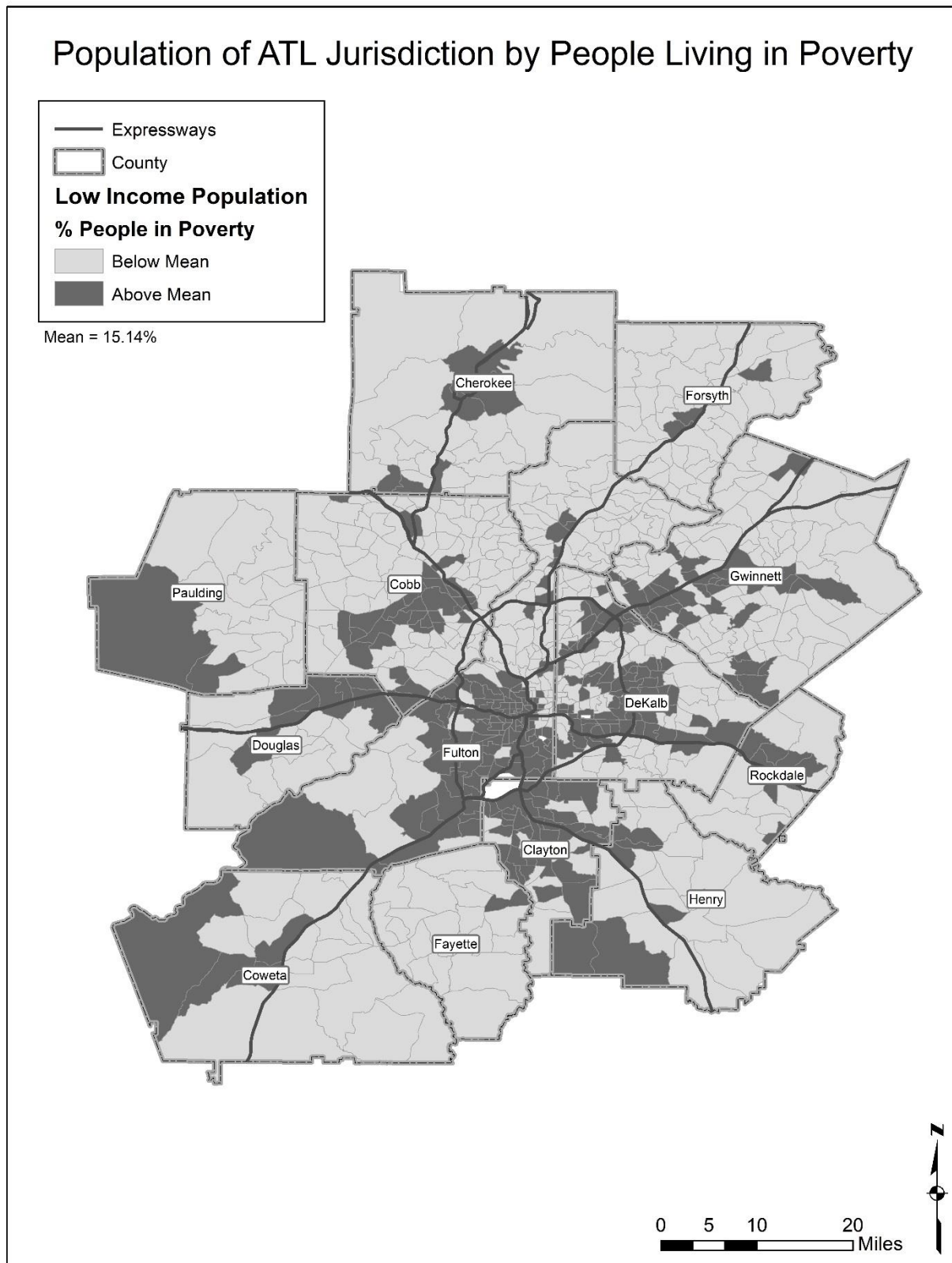
Table 3: Low-Income Population by County in 13-County Area

County	Percent Population below Poverty (%)
Cherokee County	10.27
Clayton County	22.51
Cobb County	11.00
Coweta County	10.49
DeKalb County	18.02
Douglas County	14.25
Fayette County	6.32
Forsyth County	6.53
Fulton County	19.78
Gwinnett County	13.20
Henry County	11.10
Paulding County	9.56
Rockdale County	16.19
Combined 13-Counties	15.14
Source: American Community Survey 5-year Estimates (2017) DP03	

The following map shows the areas of the ATL jurisdiction that have higher concentrations of people living in poverty when compared to the average for the 13-County area. Areas to the South and West of the central business district as well as along the interstate corridors generally have a higher concentration of people living below poverty.



Figure 2: Low Income Population in 13-County Area



## B. Limited English Proficient Populations

The United States Census' most recent American Community Survey (ACS) 5-year estimates (2017) 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."

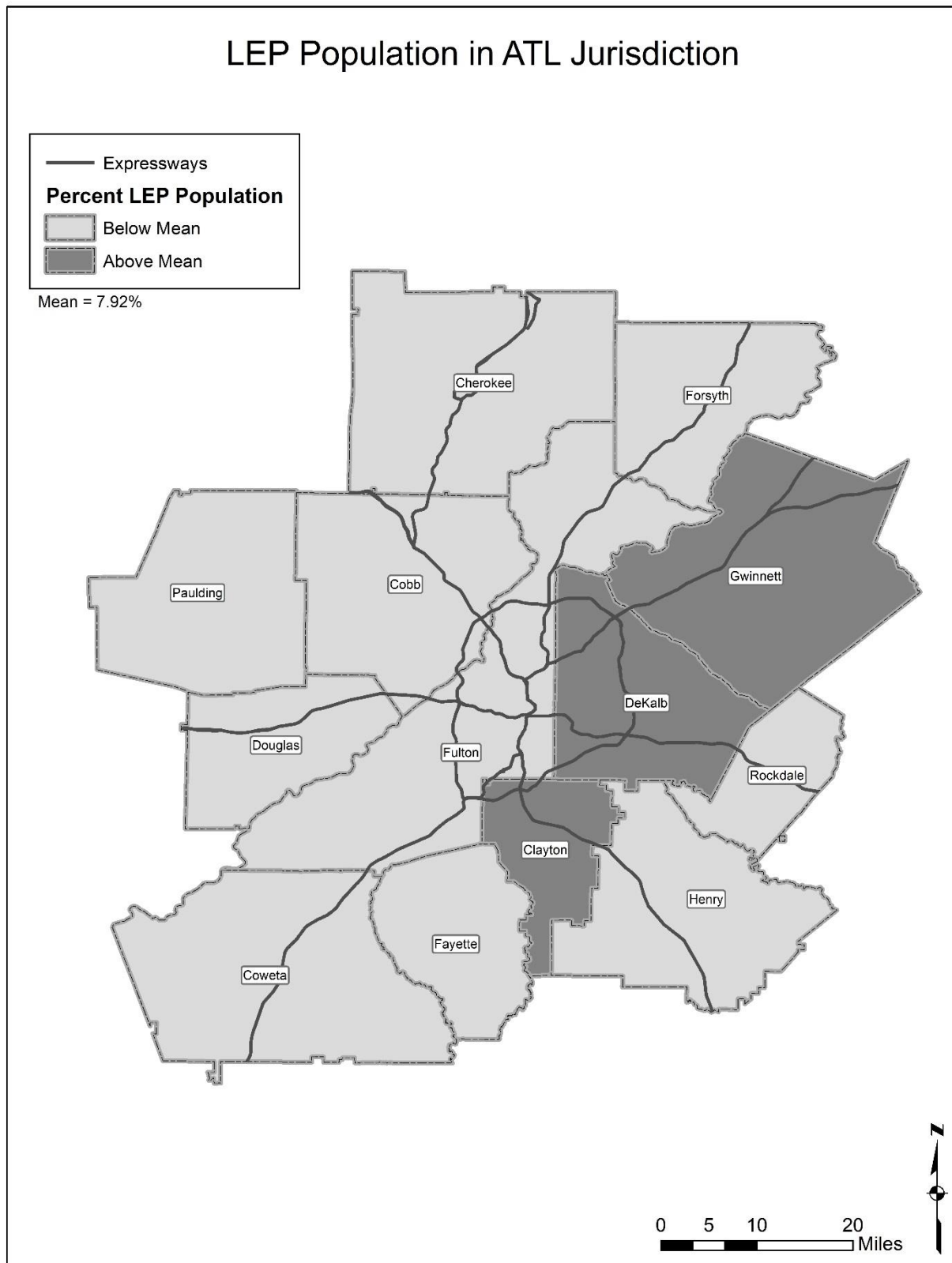
According to the ACS, of the total population over the age of five in the 13-county area (4,619,393):

- Approximately 19.7% (909,233) speak a language other than English at home; and
- Approximately 7.9% (365,785) speak English less than "very well"

Table 4: LEP Population by County in ATL 13-County Area

County	Total Population of Speaking Age (5 Years and Older)	LEP Population	Percent LEP Population (%)
Cherokee County	221,203	10,841	4.90%
Clayton County	252,893	23,989	9.49%
Cobb County	691,230	51,909	7.51%
Coweta County	129,320	5,144	3.98%
DeKalb County	682,939	61,050	8.94%
Douglas County	131,184	5,402	4.12%
Fayette County	105,483	3,407	3.23%
Forsyth County	198,004	12,880	6.50%
Fulton County	947,692	51,649	5.45%
Gwinnett County	828,991	125,369	15.12%
Henry County	204,781	6,346	3.10%
Paulding County	142,456	2,385	1.67%
Rockdale County	83,217	5,414	6.51%
Combined 13-Counties	4,619,393	365,785	7.92%
Source: American Community Survey 5-Year Estimates (2017) S1606			

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



## VI. Public Participation Methods

ATL strives to proactively promote public involvement and to inform the public of current initiatives, programs, and issues. The following are examples that ATL 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 ATL:** Outreach information can be publicized in printed materials produced by ATL.
- **ATL Website:** The ATL website, <https://www.atltransit.ga.gov>, is a communications tool providing substantial information about ATL policies, strategies, plans, and methods. The ATL 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. ATL also publicizes in other ethnic community media outlets when applicable.
- **Informational Public Meetings:** ATL conducts several different types of informational public meetings. Meetings are designed to engage the public in providing their input, testimony, or comments regarding proposed projects, 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. ATL 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. ATL 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 table top 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 normally conducted with a hearing officer and a court reporter who transcribes the public comments.
- **Translation and Interpretive Services** – ATL 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.

## **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 ATL, 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, ATL 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:***

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

1. Post notices to inform the public on the ATL 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 ATL Office of Communications and Engagement, 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 ATL 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 to record comments from members of the public who prefer to provide direct, oral comments
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 ATL 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 Office of Communications and Engagement, Atlanta-region Transit Link Authority at ATL's headquarters address as listed on its website in writing at least 4 working days prior to the hearing date.

#### **D. ATL Oversight of Contractors and Subrecipients**

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

Accordingly, the Office of Communication and Engagement, the Civil Rights Officer, and the Compliance Manager shall be responsible for monitoring and observing the public involvements activities of and maintaining the records necessary for documenting that ATL subrecipients are conducting compliant public involvement activities, to include, if applicable, if making significant changes in transit programs, services or fares. ATL'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 such as posting of policy and training.

## Appendix D – Limited English Proficiency Access Plan

### **I. Introduction**

The Atlanta-region Transit Link Authority (ATL) 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, ATL 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.

ATL's LEP Access Plan consists of two main components. The first component is the Four Factor Analysis that ATL 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 below. Each of the following factors is examined to determine the level and extent of language assistance measures required to ensure meaningful access to ATL activities by LEP persons.

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

For the ATL, the primary opportunities for direct interaction with the public for the ATL occurs at public meetings, community outreach activities, and attendance at events with partner transit agencies. ATL's five major functions are as follows:

- Development and maintaining of a Regional Transit Plan
- Administration and monitoring of regional federal and state transit funding
- Creation, implementation, and communication of a unified regional transit brand
- Interaction and coordination with existing transit operators
- Regional transit governance

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

Although the ATL has different types of opportunities for contact with the public than regional transit operators, the ATL as the oversight agency for regional planning and funding, does interact and partner with agencies that may have frequent direct contact with underserved populations such as the limited-English proficient community. The population data provided by the American Community Survey helps the ATL 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 US Census Bureau's American Community Survey (ACS) 5-Year Estimates for 2017, approximately eight percent of the residents of the 13-county ATL jurisdiction age 5 or older speak English less than "very well." Table 5 evaluates the LEP population according to the primary language spoken at home, indicating that the LEP persons most likely to be encountered by ATL are those who speak Spanish (4.56% of the region's population), Vietnamese (0.50%), Korean (0.47%), and Chinese (0.44%).

Table 5 – 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 (Speak English less than very well)	Percent of Region Population (Speak English less than very well)
	Very well	Less than Very Well			
Spanish or Spanish Creole	244,037	203,918	447,955	45.52%	4.56%
Vietnamese	12,344	22,489	34,833	64.56%	0.50%
Korean	15,881	21,085	36,966	57.04%	0.47%
Chinese	18,842	19,517	38,359	50.88%	0.44%
African languages	36,319	14,643	50,962	28.73%	0.33%
Other Asian languages	20,319	8,601	28,920	29.74%	0.19%
Other Indic languages	11,786	7,450	19,236	38.73%	0.17%
French (incl. Patois, Cajun)	24,923	6,959	31,882	21.83%	0.16%
Russian	8,059	5,398	13,457	40.11%	0.12%
French Creole	9,846	4,953	14,799	33.47%	0.11%
Gujarati	9,547	4,929	14,476	34.05%	0.11%
Hindi	17,355	4,269	21,624	19.74%	0.10%



Language Spoken at Home (Other than English)	Population of 13-County Region that Speaks English:		Population of Language Speakers	Percent of Language Speakers (Speak English less than very well)	Percent of Region Population (Speak English less than very well)
	Very well	Less than Very Well			
Arabic	9,381	4,174	13,555	30.79%	0.09%
Portuguese or Portuguese Creole	6,903	3,491	10,394	33.59%	0.08%
Other Indo	6,362	3,223	9,585	33.63%	0.07%
Persian	4,057	3,021	7,078	42.68%	0.07%
Serbo	3,727	2,496	6,223	40.11%	0.06%
Japanese	3,501	2,341	5,842	40.07%	0.05%
Urdu	6,337	2,242	8,579	26.13%	0.05%
Mon	2,177	2,102	4,279	49.12%	0.05%
Tagalog	5,179	1,896	7,075	26.80%	0.04%
Laotian	2,643	1,613	4,256	37.90%	0.04%
Other Slavic languages	2,692	1,397	4,089	34.16%	0.03%
German	10,922	1,361	12,283	11.08%	0.03%
Thai	1,913	1,304	3,217	40.53%	0.03%
Other Pacific Island languages	1,567	1,301	2,868	45.36%	0.03%
Polish	1,867	649	2,516	25.79%	0.01%
Italian	2,256	594	2,850	20.84%	0.01%
Other and unspecified languages	496	379	875	43.31%	0.01%
Other West Germanic languages	3,151	319	3,470	9.19%	0.01%
Greek	1,796	294	2,090	14.07%	0.01%
Hungarian	562	207	769	26.92%	0.00%
Hmong	718	171	889	19.24%	0.00%
Scandinavian languages	1,895	121	2,016	6.00%	0.00%
Armenian	151	83	234	35.47%	0.00%
Hebrew	2,380	71	2,451	2.90%	0.00%
Other Native North American languages	499	58	557	10.41%	0.00%
Yiddish	310	31	341	9.09%	0.00%
Navajo	0	0	0	0.00%	0.00%

Source: ACS 2017, Table B16001: Language Spoken at Home by Ability to Speak English 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.

Table 5 also tracks the percentage of each language group that speak English less than very well. Of the top four 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, 64.56%. Spanish has the lowest rate of limited English proficiency among its speakers, albeit the rate is significant at 45.52%. This information further exemplifies the need for translation services for Spanish, Vietnamese, Korean, and Chinese speakers.

## **Factor 2: Frequency of Contact with LEP Individuals**

Individuals are able to engage with the ATL in four primary ways: via telephone with ATL staff, in-person at ATL Board meetings, public meetings, other agency events, community outreach events, or through the ATL website. These primary points of contact are monitored by the ATL to estimate the frequency with which LEP persons come into contact with the Authority. Monitoring occurs via an evaluation of call data, website traffic, and attendance at publicly accessible meetings and activities.

The ATL utilizes Google Translate on its website to assist LEP persons. The ATL will track and record the number of page views to the ATL webpage, including the number of times the website is translated into a language other than English. This tracking will allow the ATL 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 ATL's key functions, referenced in the Factor 1 Section above, are important activities for improving regional transit access and mobility in the Atlanta metropolitan area. Because the ATL has a strong commitment to encouraging public involvement in regional transportation planning, funding, and governance decisions it is important that the tools and 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 ATL and Overall Cost**

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

The ATL, pursuant to a MOU with SRTA, has access to various translation services. The total costs associated with SRTA's LEP monitoring and outreach efforts are estimated to be \$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 ATL 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 ATL's role as the responsible agency for regional transit planning and oversight of federal/state transit funding could be significant. Therefore, ATL is committed to providing meaningful access to LEP individuals through ATL's LEP Access Plan.

#### IV. Limited English Proficiency Access Plan

Based on results from the Four Factor Analysis, the Limited English Proficiency Access Plan outlines how ATL will provide language assistance services to notify LEP persons about the availability of language assistance services and provide for the monitoring of the Authority's efforts and updating of the Access Plan.

To prepare the Access Plan, ATL 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 ATL via contact information provided on website and outreach material), in-person (public meetings/hearings, community outreach, partner agency events), and via the ATL website. The appropriate type of LEP assistance varies depending on the interaction point.

##### 1. Language Assistance Services by Interaction Point:

- **Telephone:** The ATL website and other distributed ATL 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 ATL Board meetings, public meetings and hearings, community outreach and partner agency events. Regardless of the specific location, there are several ways in which ATL 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. 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 ATL 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 Spanish, Vietnamese, Korean, and Chinese as they are the largest LEP populations in the region. The website may also be translated into alternative 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 ATL at public meetings/hearings and other events will have “I Speak” cards available and Language Line ready in event LEP assistance is required. 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 ATL website.
- **Website:** The ATL website provides language assistance with the use of Google Translate. It provides fully translatable HTML text in Spanish, Vietnamese, Korean, and Chinese. Text on the website which is viewable via Google Translate directs LEP individuals to the ATL contact information so that additional assistance may be provided through Language Line.

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

ATL 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 ATL. 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., ATL 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 ATL 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 ATL 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 ATL Title VI Officer.

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