



ATL

**ATLANTA-REGION
TRANSIT LINK AUTHORITY**

TITLE VI PROGRAM

Board Approval Date: March 7, 2019

Revised Board Approval Date:

PROPOSED

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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. The ATL assumed responsibility for the management of the Xpress Commuter Bus Service July 1, 2020.

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.

A. Notice to Public

ATL's *Statement of Policy* shall be published on the ATL website at ATLTransit.ga.gov. A copy of the *Statement of Policy* is included in **Appendix A** of this document.

B. Title VI Complaint Procedures and Forms

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

C. Title VI Investigations, Complaints, and Lawsuits

i. Background

In order to fulfil FTA's requirement to record and report transit-related Title VI investigations, complaints, and lawsuits, ATL 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
- Lawsuits, and
- Complaints naming the recipient.

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

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.

Prior to the transfer of Xpress operations to the ATL, the following entries record events since the approval of the last SRTA Title VI Program on April 18, 2017 through December of 2019. There have been no additional Title VI related complaints for the period January 2020 through July 2020. Each entry will have a subsequent chart that details:

- Date that the transit-related Title VI investigation, lawsuit, or complaint was filed
 - Complainant identifier linked to a name for internal records
 - Summary of the Allegation(s)
 - Actions taken by the recipient in response or final findings related to the investigation, lawsuit, or complaint
- ii. [Status of the Investigation, lawsuit, or complaint](#) [Current Investigations, Complaints, and Lawsuits](#)
- 1. Active investigations conducted by FTA and entities other than FTA:**
ATL has had no investigations conducted by FTA or entities other than FTA that have found ATL to be in noncompliance with any civil rights requirements.
 - 2. Lawsuits:**
ATL does not have any lawsuits that allege discrimination on the basis of race, color, or national origin.
 - 3. Complaints naming the recipient:**
Prior to the transfer of Xpress operations to ATL from SRTA, SRTA has had two (2) complainants file Title VI complaint forms. The details of those complaints are detailed below:

Table 1: [Complaint #A](#)

Complaint #1	
Date filed	10/11/2019
Complainant Name	Complainant A
Summary of Allegation(s)	<p>Complainant A sent a Title VI complaint to the SRTA Title VI email account alleging discrimination due to poor air quality. Parker Martin, SRTA Title VI Officer, spoke with Complainant A over the phone to collect more information about the nature of the complaint and any role that the agency has in the complaint.</p> <p>Based on the conversation, it was determined that Complainant A was concerned about poor air quality stemming from the nearby airport and industrial uses and was enquiring about programs to better support the community in which they reside. Parker Martin mentioned the roles and purposes of SRTAs transit and tolling programs that have an emphasis on reducing local vehicular emissions and improving air quality in the region.</p> <p>Parker Martin directed Complainant A to Xpress/Peach Pass customer service for any information on how they can ride Xpress or obtain a Peach Pass. Parker Martin also provided Complainant A with contact information for the Georgia Environmental Protection Division for more information about air quality improvement programs in the State of Georgia.</p>
Actions taken by the recipient in	Civil Rights Officer, Parker Martin, spoke with Complainant A on 12/6/2019 and determined that Complainant A 's concerns were not with the transit programs of SRTA but rather poor air quality from other sources near his home. Parker Martin

response to final findings	provided Complainant A with information on how to contact GA EPD for his air quality concerns.
Status of the investigation, lawsuit, or complaint	Closed; 12/6/2019

Table 2: Complaint #B

Complaint #2	
Date filed	10/29/2019
Complainant Name	Complainant B
Summary of Allegation(s)	Complainant B sent an email to the SRTA Title VI email account with a complaint form detailing examples of harassment they, and other riders, experienced onboard Xpress buses. Complainant B alleges that two men on the buses made racially insensitive jokes and made the complainant feel uncomfortable as a person of color. Over a period of several days, Complainant B alleges the passengers continued to make racially insensitive remarks directed at them and other women of color onboard. Complainant B eventually stopped riding the bus.
Actions taken by the recipient in response to final findings	<p>Civil Rights Officer Parker Martin spoke with Complainant B on 11/25/2019 and collected additional information for follow-up. Xpress Operations consulted with the driver who recalled an incident of a rider coming to the front of the bus to complain about the behavior of a few passengers. But the driver did not have any additional information that would help further investigation. Xpress Operations also requested video footage from onboard the bus for the date of the incident however no footage could be collected.</p> <p>Based on the results of the internal investigation, no further action may be taken. Parker Martin responded to the complainant detailing the findings from SRTA's internal review.</p>
Status of the investigation, lawsuit, or complaint	Closed; 3/4/2020

D. 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.

E. 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.

F. 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 July, 2020.

Table 2: ATL Board Demographics

2020 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."

G. 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.

H. Determination of Site

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

I. Transit Facility Title VI Equity Analysis

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

Prior to the transfer of Xpress operations from SRTA to the ATL, there was one funding request for a new transit facility. This new transit facility project is to be managed by ATL.

Since SRTA's 2017 Title VI Plan, SRTA requested funding for a new transit facility, the Sugarloaf Park-and-Ride lot located on the north side of Duluth Highway, east of I-85 and west of North Brown Road NW in Gwinnett County. The park-and-ride lot is expected to be funded from Federal Surface Transportation Block Grant (STBG) flex funding transferred from FHWA to FTA, General Obligation Bond issuances to the Georgia Regional Transportation Authority (GRTA4 and GRTA5 issuances), and in-kind land value. SRTA received a categorical exclusion for this project, which can be found in **Appendix H**.

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 October 4, 2020. ATL will be conducting a public comment period from August 4, 2020 through September 3, 2020 and a public hearing on or about August 25, 2020. Due to COVID-19 restrictions and precautions, the public hearing format will employ CDC recommended guidelines for participants. Additional methods of providing public comment remain in place to include email, phone, and/or mail.

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

Section 2. Requirements of Fixed Route Transit Providers

A. Service Standards and Policies

ATL has established Xpress Service Standards and Policies (**Appendix E**) which establishes 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

B. Demographic and Service Profile Maps

As required by FTA Circular 4702.1B, Chapter IV, ATL has prepared demographic and service profile maps of the Xpress service area utilizing data from the 2013-2017 American Community Survey. Copies of the maps based upon Xpress' current services and the demographic data from the 2013-2017 American Community Survey are included in **Appendices F**.

Transit access by community in the Xpress service area is monitored at a planning level through regular short-range transit planning activities and the Title VI Program updates which reviews the racial make-up of census tracts served by existing Xpress routes, as well as those areas where ATL is planning new services.

The tables below compare the minority, income and LEP status of the Xpress riders using the 2018 on-board survey and the population of the 13 counties served by Xpress using the American Community Survey 5-year Estimates, 2017. As compared to the 13-county region, Xpress ridership has somewhat greater representation by minorities and somewhat lower representation by low income and LEP populations.

Table 4: Demographic and Service Profile Maps

Demographic and Service Profile Maps		
Demographic Category	Region	Xpress
Minority	55.3%	70.7%
Low Income	15.4%	7.9%
Limited English Proficiency	7.9%	1.4%

C. Ridership Demographics and Survey Data

Xpress conducted a survey of Xpress riders' demographic data in the spring of 2018. This survey and its resulting data were utilized to develop a demographic profile for Xpress riders by route, and to identify the travel pattern utilized. Tables summarizing the results by route are included in **Appendix G**.

D. Results of Monitoring

As required by FTA Circular 4702.1B, ATL will monitor the Xpress commuter bus service for Title VI compliance once every three years based on the *Service Standards and Policies*. SRTA, prior to the transfer of Xpress operations to ATL, prepared a Title VI Service Standards Monitoring Report which was reviewed and approved by the GRTA Board of Directors, acting as the Transit Advisory Board for the SRTA Board of Directors on September 12, 2018. The next compliance monitoring report will be completed in 2021.

E. Public Engagement Process for Setting Title VI Policies

Prior to formal adoption by the ATL Board, ATL conducted a 30-day public comment period which will begin on August 4, 2020 and end on September 3, 2020. Consistent with ATL's Public Participation Plan, the following activities will take place:

- A. ATL will publish a draft ATL Title VI Program on the Xpress web site.
- B. ATL staff will host a public hearing on or around August 25, 2020
- 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 five days prior to the public hearing. Newspapers include: Crossroads News, Atlanta Chinese News, Korea Daily, Mundo Hispanico, and others that provide coverage to the 13-county area.

The public comment period will end prior to the September 3, 2020 ATL Board of Directors meeting.

F. Service and Fare Equity Analysis Procedures

ATL 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 twenty-five percent of the revenue hours of operation for an individual ATL-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 ATL-operated Xpress average minority passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey. 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 ATL-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. 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.

ATL 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, ATL 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, ATL will also evaluate changes to determine whether fare or major service changes create a disproportionate burden on low-income populations.

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

The ATL 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 last Title VI Program in 2017, SRTA, prior to the transfer of Xpress operations to ATL, has conducted one (1) equity analysis for changes to the Xpress fare structure. The Memorandum, Presentation, and Board Resolution showing the ATL Board of Director's approval may be found in **Appendix I**.

i. Service Equity Analysis for Major Service Changes

For ATL 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, ATL recognizes that the elimination or addition of an ATL 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 ATL 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 F 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 ATL operated Xpress fare changes, adverse effects are measured in the change in the average fare paid by minority and low-income communities. ATL 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. ATL 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. ATL 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.

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) 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.

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, Xpressga.com, 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
(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 or www.XpressGa.com 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

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.

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.

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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.

ATL is supportive of holding public hearings and meetings virtually in order to continue to provide meaningful public participation and engagement during unforeseen events that may preclude the option for in-person public participation due to current circumstances.

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

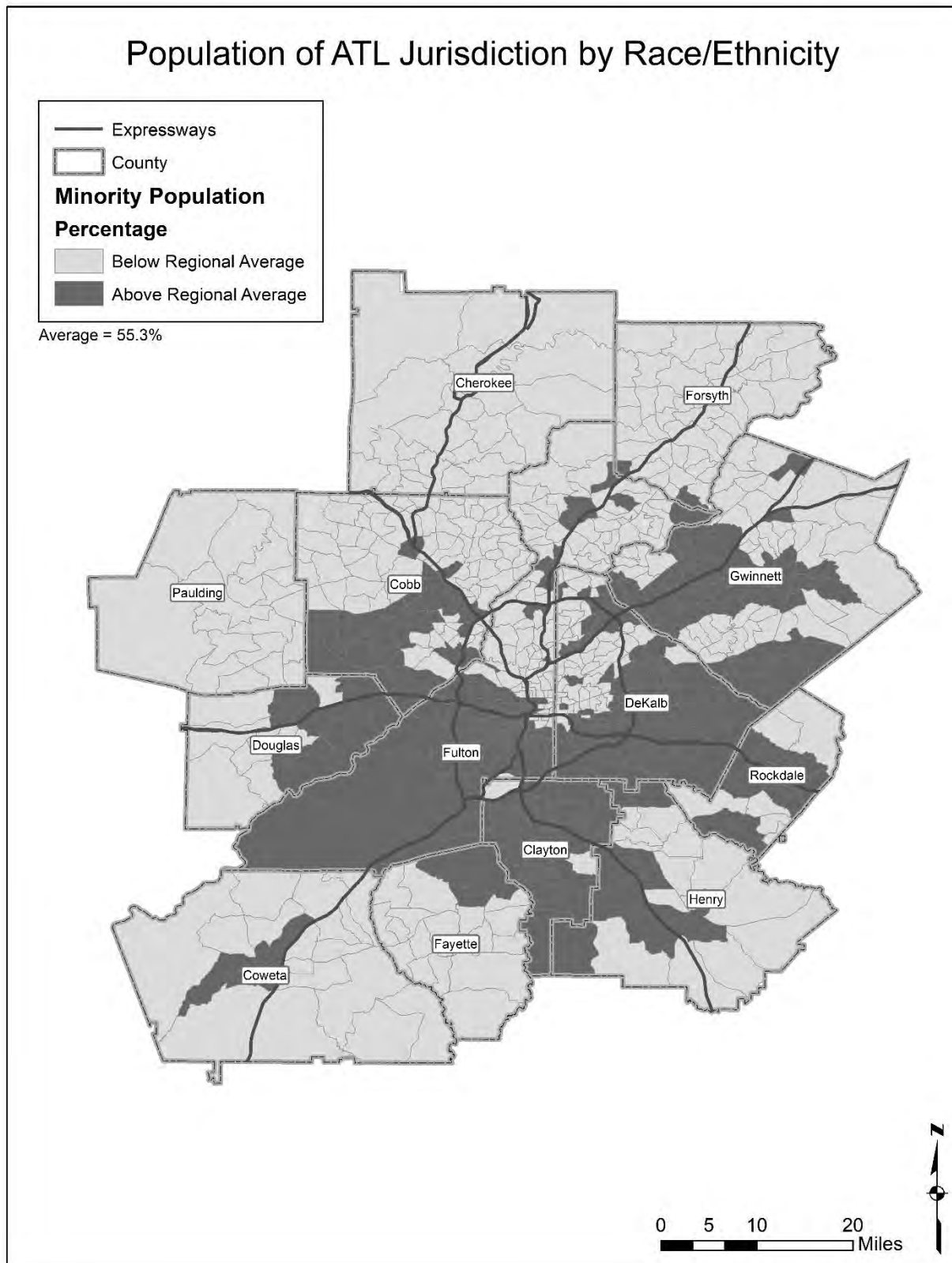
Using the American Community Survey 5-year estimates (2017), ATL has determined that 55.3% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, "minority" is defined as any individual not classified as white, non-Hispanic. Table 2 shows the proportion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

Table 3: 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%
Total 13-counties	4,943,718	2,733,546	2,210,172	55.3%
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

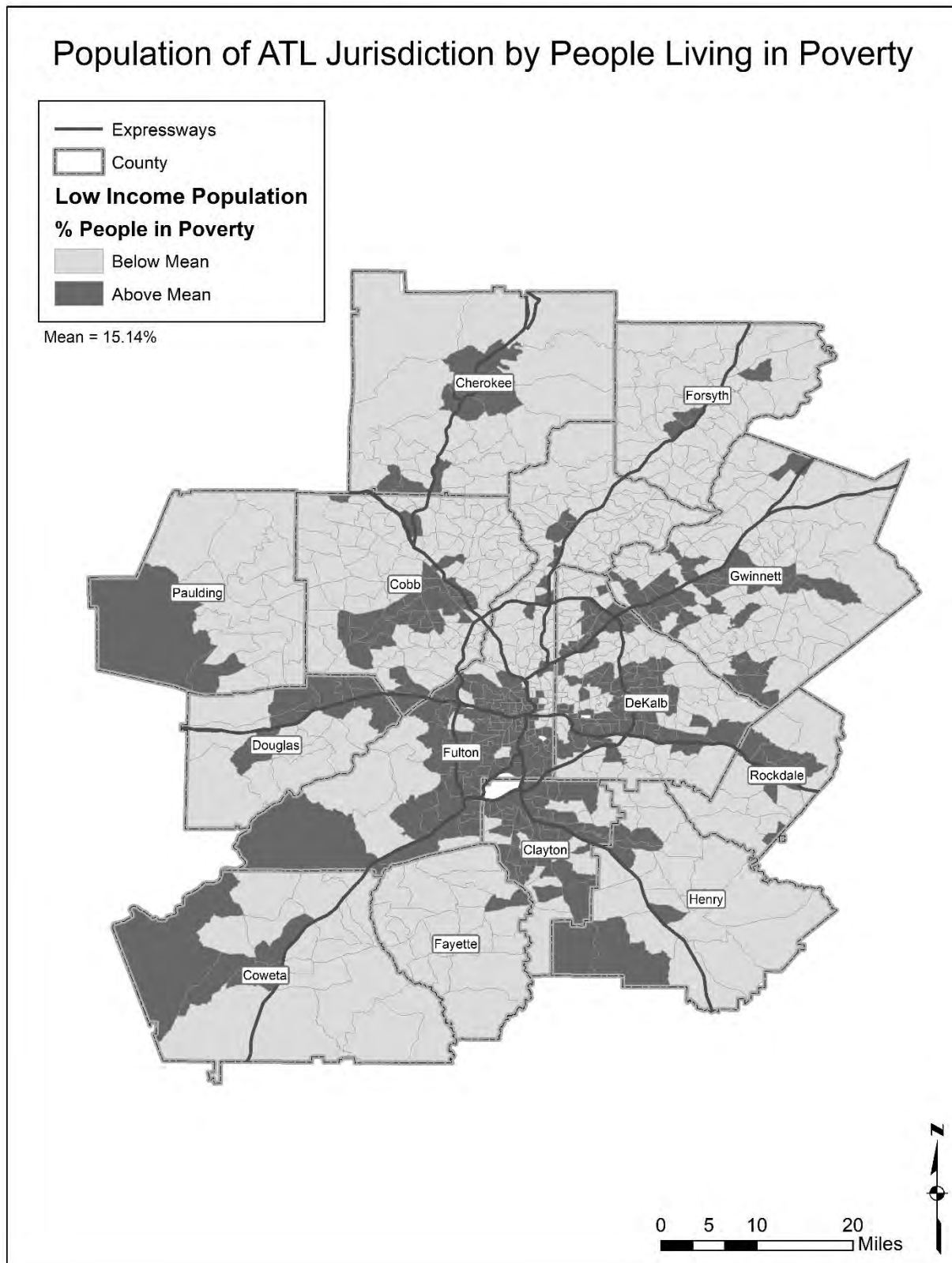
Table 3 presents the low-income population by county within the 13-county area.

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."

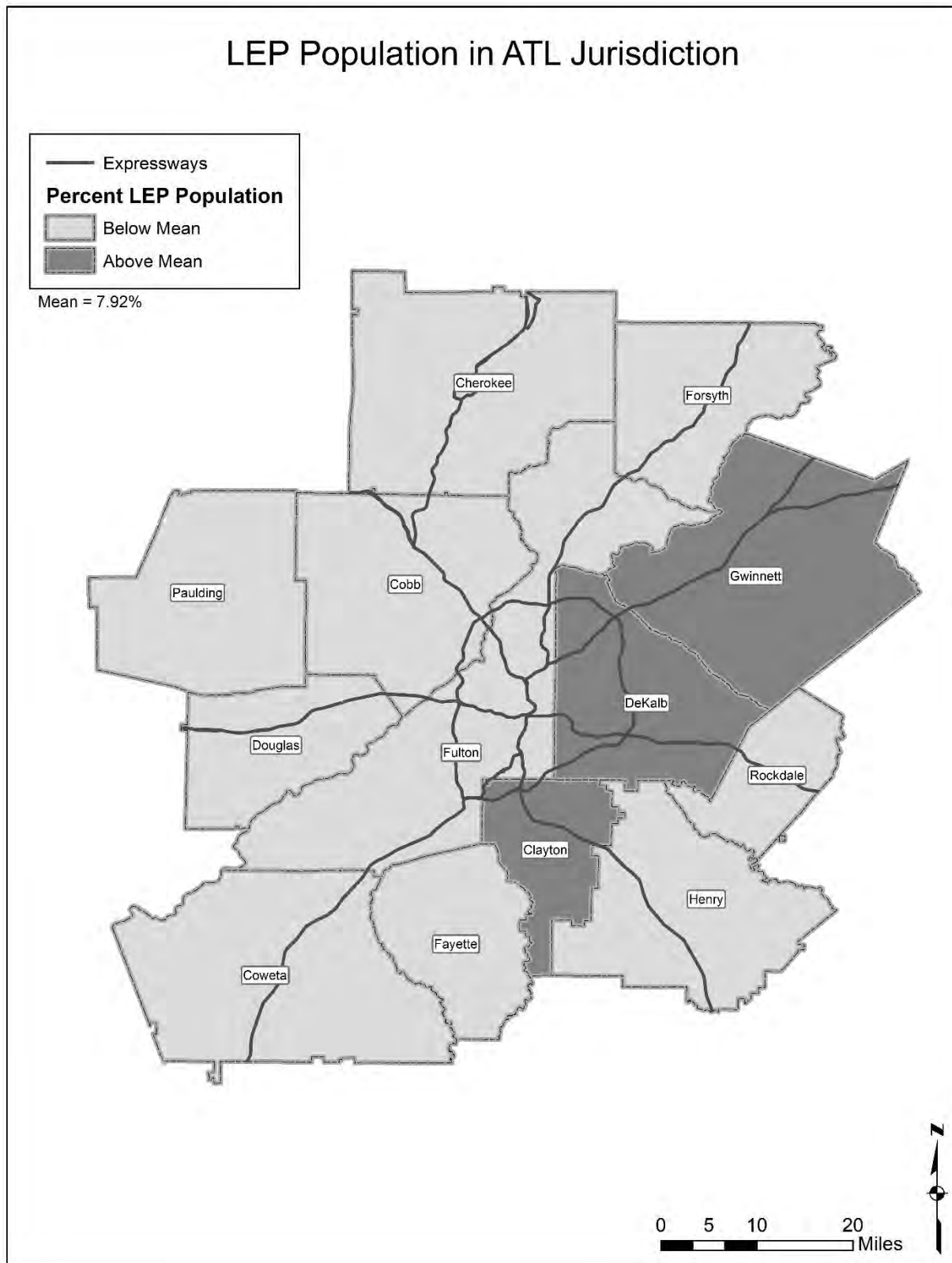
According to the ACS, of the total population over the age of five in the 13-county area (4,619,393):

- 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.
 - **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 ATL 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.

- **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.

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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%

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			
Hindi	17,355	4,269	21,624	19.74%	0.10%
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.

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

Appendix E – Service Standards and Policies

Xpress Service Standards & Policies

1.0 Overview

The Atlanta-region Transit Link Authority (ATL) 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 5:30 am and 10:30 am and between 1:00 pm and 7:45 pm.

The primary purpose for maintaining service standards is to guide ATL staff as to when service changes are necessary and ensure compliance with applicable federal guidelines. This document 1) sets ATL'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) **ATL Operated Xpress Routes** – The Xpress routes that are paid for, and operated, by ATL.
- 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** – ATL 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 ATL 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, ATL will monitor the performance of ATL operated Xpress routes relative to the above standards and policies at least once every three years.

1.) *Trip and Route Productivity Standards*

New ATL-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 ATL 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, ATL 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, ATL 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. ATL'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 ATL will assess productivity according to these standards up to twice per year. ATL 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, ATL will reduce headways first on Xpress routes with the highest vehicle load factors and/or customers per trip. ATL 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

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. ATL's overall OTP goal for Xpress is for at least 85% of all trips to be on time. To achieve this goal, ATL 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.

ATL 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, ATL 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 includes 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. ATL 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 ATL is required to protect the federal interest for the useful life of its Xpress assets, required construction at leased lots is limited to passenger shelters and ADA parking spaces. However, ATL 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. ATL has no requirements for transit amenities at these lots, but ATL will review available transit amenities options with interagency partners.

As of the effective date of this Program, ATL 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, ATL 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 ATL -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.

- ATL 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.

Appendix F – Demographic Data Maps

Minority Populations

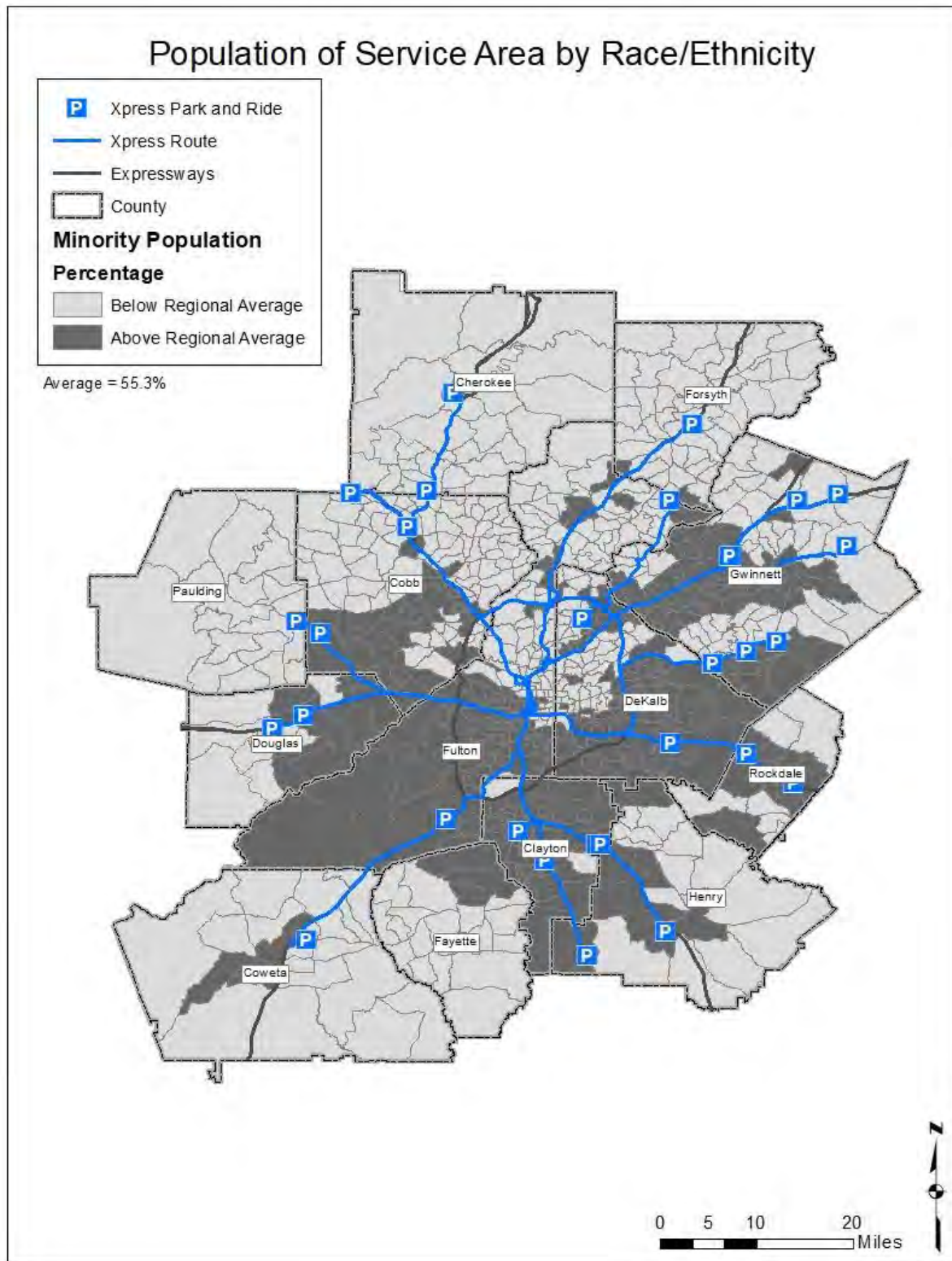
Using the American Community Survey 5-year estimates (2017), ATL has determined that 55.3% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 1 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 14: Minority Population by County in Xpress Service Area

Minority Population by County in Xpress Service 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%
Total 13-counties	4,943,718	2,733,546	2,210,172	55.3%
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 service area average as well 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 Service Area



Low-Income Populations

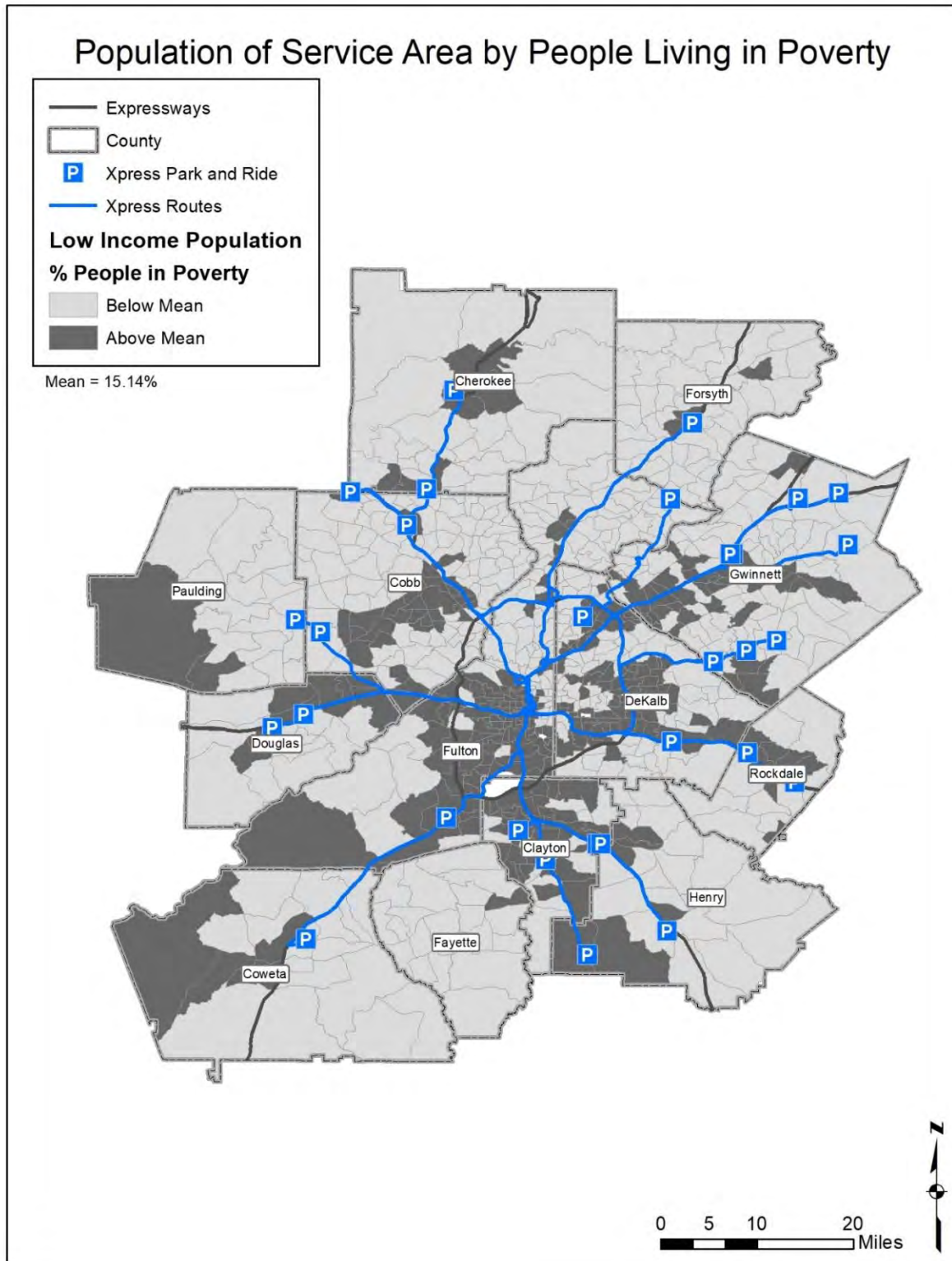
Table 2 presents the low-income population by county within the 13-county area.

Table 2: Low-Income Population by County in 13-County Xpress Service Area

Low-Income Population by County in 13-County Xpress Service 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 depicts areas with a higher concentration of low-income populations in the Xpress service area. Higher concentrations of low-income populations can be found in the central portion of the service area as well as portions of the outlying counties.

Figure 4: Low Income Population in Xpress Service Area



Limited English Proficiency 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."

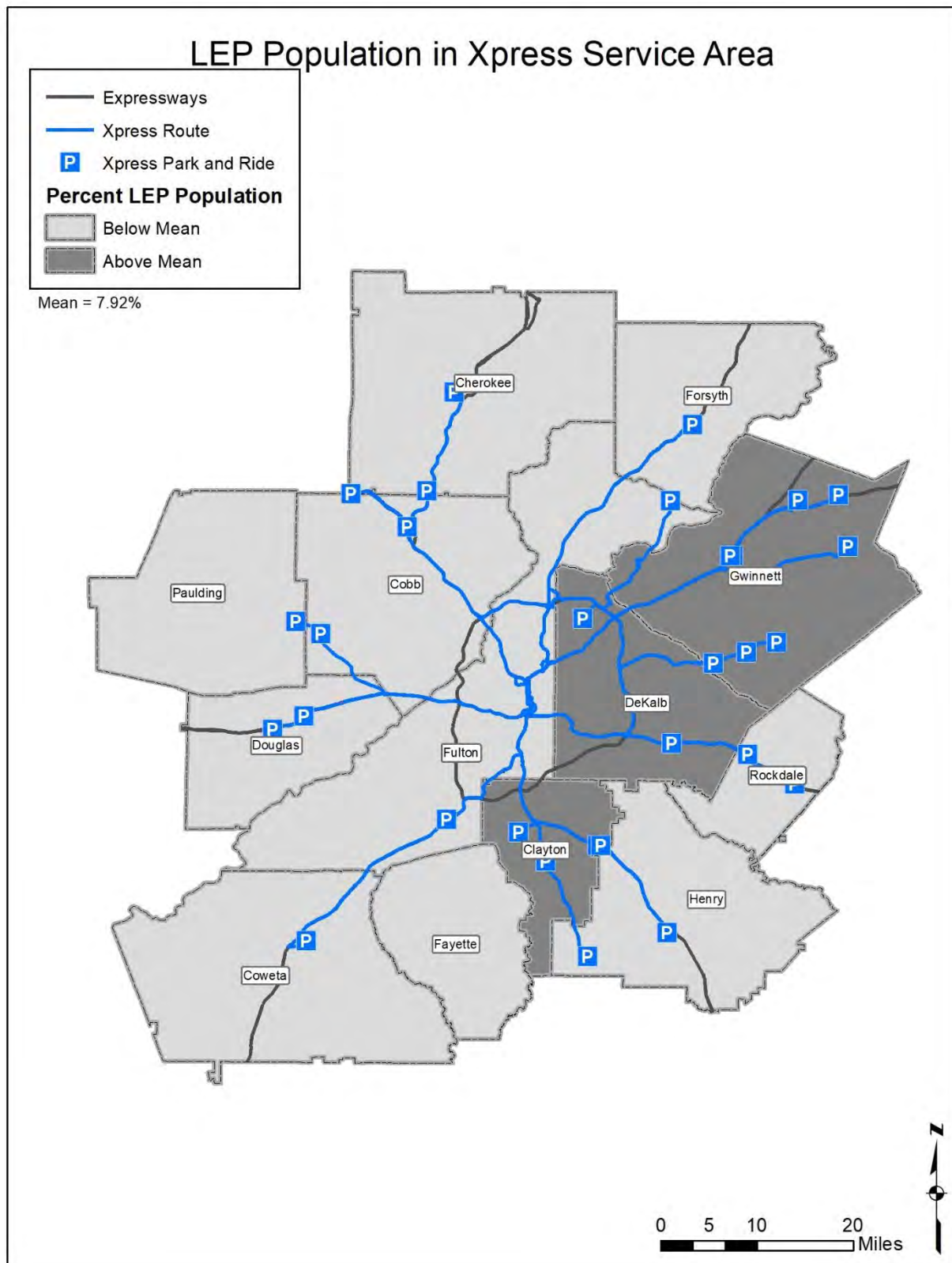
According to the ACS, of the total population over the age of five in the 13-county area (4,619,393):

- 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 3: LEP Population by County in Service Area

LEP Population by County in Service 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 Service Area



Appendix G – Ridership Demographics (Survey Data)

The ridership demographic data presented in the tables below was collected as part of the 2018 Xpress On-Board Survey.

Table 1: Minority Ridership by Route

Minority Ridership by Route									
Route	African American	Hispanic/Latinx	Asian	Pacific Islander	Native American	White	Other	Totals	% Minority
400	2	3	35	0	0	26		66	60.61%
401	0	2	21	0	0	17		40	57.50%
408	22	5	9	0	0	4		40	90.00%
410	26	7	6	0	0	20		59	66.10%
411	26	5	8	0	2	67		108	37.96%
412	34	4	44	0	0	56		138	59.42%
413	15	8	5	0	0	28		56	50.00%
414	16	6	6	0	0	28		56	50.00%
416	55	13	13	1	1	51		134	61.94%
417	25	5	1			12	1	44	72.73%
419	129	8	19	1	4	35		196	82.14%
423	137	2	2	1	0	11		153	92.81%
426	198	9	3	1	6	34		251	86.45%
428	40	2	0	0	1	6		49	87.76%
430	105	6	4	1	0	29		145	80.00%
431	62	5	5	0	2	24		98	75.51%
432	107	6	7	1	4	23		148	84.46%
440	78	4	3	2	1	22		110	80.00%
441	65	4	4	1	4	5		83	93.98%
442	34	2	1	0	0	3		40	92.50%
453	51	8	5	1	0	63		128	50.78%
463	128	7	4	0	0	60		199	69.85%
476	83	11	4	0	2	34		134	74.63%
480	23	12	7	0	0	26		68	61.76%
482	8	2	1			11	1	23	52.17%
483	24	4	7	0	2	60		97	38.14%
490	12	7	2	0	0	43		64	32.81%
Grand Total	1505	157	226	10	29	798	2	2727	70.74%

Table 2 illustrates a breakdown of the household income levels of Xpress riders by Route. Low-income, for purposes of this table and uses in planning Xpress service, is defined as any rider with an annual household income less than \$30,000. This decision is due to the varying income thresholds for defining poverty at the federal level based on household size and the nature of requesting household income information in a survey format.

Income by Route								
Route #	\$135,000 or more	\$100,000-134,999	\$70,000-99,999	\$30,000-69,999	\$10,000-29,999	Under \$10,000	Total	% Low Income
400	10	18	13	5	2	1	49	6
401	6	10	9	2	1		28	4
408	2	4	5	12	12	2	37	38
410	13	14	18	11	0		56	0
411	37	24	21	17	1	1	101	2
412	41	34	24	18	4	3	124	6
413	6	18	15	9	3	1	52	8
414	16	10	12	11	1		50	2
416	23	27	30	26	5	5	116	9
417	5	4	17	14	0		40	0
419	25	33	38	57	15	6	174	12
423	13	27	34	63	8	7	152	10
426	21	38	54	84	23	7	227	13
428	3	8	8	21	3	1	44	9
430	18	22	24	61	6	5	136	8
431	14	14	20	33	8		89	9
432	15	21	37	56	7	2	138	7
440	10	14	20	47	8	2	101	10
441	3	5	14	45	2	2	71	6
442	2	5	8	15	5		35	14
453	12	23	27	46	6	2	116	7
463	26	39	42	68	6	2	183	4
476	19	24	31	44	7	4	129	9
480	12	18	15	12	2	3	62	8
482	4	5	6	8	0		23	0
483	17	25	23	22	2	1	90	3
490	11	16	14	12	2		55	4
TOTAL	384	500	579	819	139	57	2478	8

Table 2 - Income by Route

Table 3 below details the responses in the 2018 Xpress Onboard Survey by route and language spoken at home, regardless of English proficiency. The 2018 Xpress Onboard Survey received 2,855 total responses, of which 1.4% indicated that they spoke English less than very well.

Table 3- Language Spoken at Home by Route

Language Spoken at Home by Route										
Route	English	Japanese	Korean	Mandarin	Cantonese	Spanish	Vietnamese	Other	TOTAL	% LEP
400	49		1					11	61	1.5%
401	28			1		3		8	40	2.5%
408	31	1	1					3	36	2.9%
410	55		1	1		3		4	64	3.1%
411	106	1	1	1		1		2	112	0.9%
412	119		2	5	2	2		7	137	0.7%
413	55		2			3			60	1.7%
414	55					3			58	0.0%
416	125		1	1		7		2	136	1.4%
417	46					1			47	2.1%
419	198			2		1		8	209	1.0%
423	174								174	0.6%
426	267					3	1	2	273	1.9%
428	53								53	2.0%
430	150					5		2	157	1.3%
431	91		1			2	1		95	0.0%
432	147					1	1	2	151	1.3%
440	112						1	1	114	2.7%
441	80					2	1		83	1.2%
442	40					1	1	1	43	2.5%
453	122		2			5		1	130	0.8%
463	210		1		1	3			215	0.5%
476	142					3			145	3.5%
480	60					9		3	72	0.0%
482	22		1						23	4.3%
483	99					1		2	102	1.0%
490	63					2			65	1.5%
Grand Total	2,699	2	14	11	3	61	6	59	2,855	1.4%

Appendix H – FTA Categorical Exclusion – Sugarloaf Park and Ride



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St.,
N.W., Suite 1400
Atlanta, GA 30303
404-865-5600

March 13, 2018

Ms. Annie Gillespie
State Road & Tollway Authority
245 Peachtree Center Avenue, Suite 2200
Atlanta, GA 30303

RE: Categorical Exclusion – Sugarloaf Park and Ride

Dear Ms. Gillespie:

The Federal Transit Administration (FTA) has received and reviewed the Categorical Exclusion (CE) documentation submitted by your office on February 1, 2018 for the subject project ("Project"). Based on our review of the material submitted, the project qualifies as a CE pursuant to 23 CFR 771.118(d).

If there are changes to the Project, you must notify FTA in writing. You are required to consult with FTA prior to requesting major approvals or grant awards for this Project to determine the validity of this CE. FTA will determine if any additional environmental review will be required. FTA may require reevaluation of this CE for compliance with other statutes at its discretion.

Please attach this signed CE concurrence letter from FTA, the CE document, and supporting documentation to the TrAMS grant for the above referenced project. If we can be of further assistance, please contact Mr. Stan Mitchell or Ms. Carrie Walker of my staff at 404-865-5643/5645 or stanley.a.mitchell@dot.gov/julia.walker@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Kai Meltzer for", written over a horizontal line.

Yvette G. Taylor, Ph.D.
Regional Administrator

Appendix I – Equity Analysis Memorandum, Board Presentation, and Board Approval

Figure 1: SRTA Memorandum



Memorandum

To: Gail Franklin, Chief Transit Officer

From: Parker Martin, Senior Performance Analyst

Subject: Results of Equity Analysis for Changes to Xpress Fare Policy

Date: 01/09/2018

OVERVIEW

To better integrate with regional transit fare products and reduce operational costs of multiple fare systems, SRTA is planning to make several changes to the Xpress commuter bus fare structure. Included in the changes is a phasing out of the existing magnetic tickets used for round-trip, multi-trip, and monthly fares. These fare products are also currently available on Breeze Cards. In addition, it is proposed to reduce the cost of the Green Zone Calendar Monthly fare (proposed to be made exclusively available to TMA, SECAP, and bulk order customers) from \$100 to \$90.

The proposed phasing out of the magnetic tickets will not result in an increase or decrease in the cost of any Xpress fare. However, with the elimination of the magnetic fare media, all riders who utilize either the round-trip, multi-trip, 31-day, or calendar monthly fares (the only fare products available on magnetic passes) will need to possess a Breeze Card which carries a two-dollar (\$2.00) upfront surcharge.

This surcharge represents a cost of using the SRTA Xpress service and therefore requires an equity analysis to determine whether or not the surcharge disparately and/or disproportionately impacts minority and low-income riders.

The second proposed change to the Xpress fare structure is a change in the monthly product available to bulk order customers. Currently, only Transportation Management Associations (TMAs) may purchase calendar monthly fare products at \$100 per month for Green Zone riders and \$125 per month for Blue Zone riders. It is proposed to make calendar monthly fare products available to SECAP and other bulk order customers as well. In order to provide a similar per trip discount for Green Zone riders compared to Blue Zone riders, it is proposed that the calendar monthly fare product for Green Zone riders be decreased to \$90. All other riders who purchase their own fares will be able to purchase a 31-day monthly fare product at a rate of \$100 per month for Green Zone riders and \$125 for Blue Zone riders.

BACKGROUND

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 State Road and Tollway Authority (SRTA) and its Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

As a transit provider operating 50 or more fixed route vehicles in peak service that is located in an urbanized area of 200,000 or more in population, SRTA is required to analyze the impacts of any fare change on minority and low-income riders as required Section IV.7. of FTA C 4702.1B

Title VI guidance also requires that SRTA 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). These policies must establish a threshold for determining when adverse effects of a fare change are borne disproportionately by minority and/or low-income populations. It is SRTA's policy that 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 more than 5 percentage points from the percent change for the overall ridership.

METHODOLOGY

The current proposed changes to the Xpress fare system are 1) phasing out of the magnetic fare tickets, and 2) a reduction in the cost for the Green Zone calendar monthly fare product. In order to estimate the impacts of the proposed fare change with available data, the following assumptions were made:

- SRTA's definition of low-income is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines. Using the poverty guidelines and the average household size for Xpress riders, the Xpress low-income threshold would be \$20,340 per household. However, based on the income categories in the 2014 Xpress Ridership Survey, a low-income threshold of \$30,000 was used in this analysis. This definition is at least as inclusive as the threshold defined by the HHS poverty guidelines.
- Based on currently available data, it is not possible to determine how many existing Xpress riders using the magnetic fare passes will need to purchase a Breeze card. It is assumed that all existing users of magnetic passes will be required to purchase a new Breeze card with the \$2 up-front cost. This equity analysis evaluates whether or not the segment of the rider base that is expected to be impacted by the change is representative of, or differs significantly from, the demographics of Xpress ridership as a whole.
- At the time of the analysis, data segmenting riders using calendar monthly passes from other riders was unavailable. For this reason, it cannot be determined what segment of the riders using calendar monthly fare product will be impacted by the reduction of the Green Zone calendar monthly fare product. In order to analyze the benefits of the proposed fare change compared to the ridership as a whole, it was assumed that the fraction of riders self-identified in the 2014

Xpress On-Board Survey as using Green Zone 31-day fare products will receive the proposed discount.

RESULTS OF FARE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of riders who would likely be impacted by the proposed fare change, the results do not indicate that there will be a disparate impact to minority riders nor will the proposed changes disproportionately burden low income riders. A detailed analysis of the impacts the proposed fare changes will have on minority and low-income customers may be found in Appendix A and Appendix B.

Appendix A: Phasing Out Magnetic Tickets

For the purposes of analyzing the impacts of the proposed change to eliminate magnetic fare media, ridership and fare usage data from the 2014 Xpress On-board Survey was used to determine whether minority and low income riders are expected to be impacted by the Breeze card cost more so than non-minority and non-low income riders. As shown in Table 1, a higher percentage of non-minority riders (79%) use magnetic fare tickets than minority riders (65%). The results are similar when comparing magnetic fare usage for non-low income riders (73%) and low income riders (46%).

Table 1: Percent Magnetic Fare Usage by Rider Group

Rider Group	Percent Using Magnetic Tickets
Minority	65%
Non-Minority	79%
Low Income	46%
Non-Low Income	73%

Based on the above results, it is expected that a larger share of non-minority and non-low income riders will be impacted by the Breeze card cost than minority and low-income riders. Therefore, the proposed change is not expected to adversely affect minority or low-income riders.

As a mitigation strategy to help offset the costs for all riders transitioning to Breeze cards, it is SRTA's plan to offer free Breeze cards during upcoming Xpress outreach events.

Appendix B: Reduction of Green Zone Calendar Monthly Fare Product

At the time of this analysis, there are two monthly fare products for both the Green Zone and Blue Zone (see Table 2). Compared to the 10-trip passes for both zones, Blue Zone monthly riders currently receive an approximately 10% discount per trip. Green Zone monthly riders however do not see a per trip cost advantage. To provide a similar discount for the calendar monthly fare users, it is proposed that the Green Zone calendar monthly fare product be reduced from \$100 to \$90.

Table 2: Proposed changes to Green Zone Calendar Monthly Fare Product

Existing			Proposed		
Product	Green Zone	Blue Zone	Product	Green Zone	Blue Zone
One-Way	\$3	\$4	One-Way	\$3	\$4
Round-Trip	\$5	\$7	Round-Trip	\$5	\$7
10-Trip	\$25	\$35	10-Trip	\$25	\$35
31-Day	\$100	\$125	31-Day	\$100	\$125
Calendar	\$100	\$125	Calendar	\$90	\$125

Existing Cost/Trip			Proposed Cost/Trip		
Product	Green Zone	Blue Zone	Product	Green Zone	Blue Zone
One-Way	\$3.00	\$4.00	One-Way	\$3.00	\$4.00
Round-Trip	\$2.50	\$3.50	Round-Trip	\$2.50	\$3.50
10-Trip	\$2.50	\$3.50	10-Trip	\$2.50	\$3.50
31-Day	\$2.50	\$3.13	31-Day	\$2.50	\$3.13
Calendar	\$2.50	\$3.13	Calendar	\$2.25	\$3.13

As noted above, not all riders will be eligible to purchase the discounted calendar monthly fare product as that will only be available for bulk order purchasers of fare products. As the data from the 2014 On-Board Survey does not allow for segmentation by bulk order purchasers, it is assumed that all existing Green Zone monthly riders will observe a 10% per trip reduction in their fares.

The current threshold for determining disparate impacts and disproportionate burdens is any change in which the difference between minority and low-income riders the overall ridership differs by more than 5 percentage points. Comparing the impact of this change on minority and low-income riders to the impacts on the overall ridership, indicates that there are no adverse impacts on minority and low-income riders.

Table 3: Cost per Trip Change with Reduction of Green Zone Calendar Monthly Fare

Rider Group	Existing Average Cost per Trip	Proposed Average Cost per Trip	Percent Change in Cost per Trip
Minority	\$2.98	\$2.95	-0.95%
Low-Income	\$3.02	\$3.01	-0.29%
Overall Ridership	\$3.00	\$2.98	-0.95%

Figure 2: Fare Change Presentation

Xpress
Breeze
Migration
Title VI
Update

STATE ROAD & TOLLWAY AUTHORITY
SRTA GRTA



Breeze Migration
Update

STATE ROAD & TOLLWAY AUTHORITY
SRTA GRTA

Fare Payment Media Changes are Proposed for 2018

- Eliminating Magnetic Stripe Tickets
- Expanding the use of Breeze Cards
- Reducing Green Zone Calendar Monthly Fare from \$100 to \$90
- All fares currently available on Magnetic Tickets will be available on the Breeze Card



1

Breeze Migration Update



Fare Payment Media Changes are Proposed for 2018

- Change must be completed prior to installation of new fare boxes on Xpress Bus.
- A minimum of six months notice will be given to the public.
- No refund of unused Magnetic Tickets is proposed.

2

SRTA Title VI Plan was utilized



Title VI Effort for Breeze Migration

- Required by Federal Law any time a fare change is proposed.
- SRTA has an adopted Title VI Plan which provides for public comment & hearing before the GRTA Board & was followed in this effort.
- Analysis performed by SRTA indicated that there are no disparate impacts.
- The ability of the public to provide input is a key element of any Title VI effort.

3

Fulton County Daily Report

Atlanta Voice

Cross Roads News

Atlanta Daily World

Atlanta Chinese News

Atlanta Journal-Constitution

Mundo Hispanico

Korean Daily

Moving Forward

PUBLIC HEARING

Title VI Outreach for Breeze Migration

- Public Comment was accepted from Nov 14 – Dec 15, 2017 via online forms, telephone & Public Hearings
- Seat Drops were placed on all Xpress Buses by November 13.
- A Banner and link to more information was placed on the Xpress website on November 13.
- Notices were issued in **4 languages** and placed in **8 publications** late in November advertising the Public Hearing and Public Outreach.

PUBLIC NOTICE

SRTA REQUESTS COMMENT ON Change in Fare Payment Methods, and Reduction of the Calendar Monthly Green Zone Fare

Comment Period: November 14, 2017, through December 15, 2017

The State Road and Tollway Authority (SRTA) asks for public comment (under the 1964 Civil Rights Act) on its eventual conversion to accepting only cash and Breeze Cards, the eventual elimination of magnetic stripe tickets, and a reduction in the calendar monthly Green Zone Fare available to group purchasers of Xpress services.

A public hearing to receive comment on the proposed updates will be held:

Date: December 5, 2017 from 11:00 a.m. to 1:00 p.m. and 5 p.m. to 7 p.m.

Location: SRTA Offices 245 Peachtree Center Avenue, NE Suite 2200 Atlanta, GA 30303

An overview of the changes can be obtained and comments can be made at www.xpressga.com. The public may also request an overview and provide comments by calling Xpress Customer Service at 644-677-7742.

The public hearing is accessible to people with disabilities and those with limited English proficiency. Accessibility and language services will be provided free of charge, upon request, as available. For more information or to request reasonable accommodations and/or language services, please contact Parker Martin at pmartin@srtga.gov or 404-693-6193. For TTY/VO, please call 711 or 1-800-255-0056. En Español – 1-888-202-3972.

Si la información que se necesita en otro idioma, comuníquese con 844-977-7742.

如需瞭解在另一種語言的信息，請致電844-977-7742。

정보를 다른 언어로 필요하시면 844-977-7742로 문의하십시오.

Nếu thông tin là cần thiết trong một ngôn ngữ khác, sau đó liên lạc 844-977-7742.

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Today's Actions

- Consider approval of the following GRTA recommendations:
 - Discontinue use of Magnetic Tickets & provide fare products on Breeze Only.
 - Discontinue acceptance of existing Magnetic Tickets no earlier than December 31, 2018.
 - Approve the proposed fare reduction for the Green Zone Calendar Monthly fare from \$100 to \$90.

5



Questions?

Figure 3: Fare Change Resolution, SRTA Board of Directors

**RESOLUTION OF THE STATE ROAD AND TOLLWAY AUTHORITY
APPROVING THE ELIMINATION OF *Xpress* MAGNETIC FARE MEDIA AND
FARE REDUCTION FOR GREEN ZONE CALENDAR MONTHLY PRODUCTS**

Resolution #2018.01.31.02

WHEREAS, the State Road and Tollway Authority (“SRTA”) operates and manages the *Xpress* Commuter Transit Service (“*Xpress* Service”) pursuant to O.C.G.A. §§ 32-10-60 through 32-10-133; and

WHEREAS, the Georgia Regional Transportation Authority Board of Directors (“GRTA Board”) serves as a Transit Advisory Board to the SRTA Board of Directors (“SRTA Board”), providing input to the SRTA Board concerning Title VI program changes; proposed major service changes; proposed fare changes; or, on any other transit matter as requested by the SRTA Board; and

WHEREAS, the GRTA Board, acting as SRTA’s Transit Advisory Board, also receives and evaluates public comment as required by SRTA’s Title VI Program and as may otherwise be required by FTA in regards to *Xpress* Service and makes recommendations for actions to the SRTA Board based upon the public comments received; and

WHEREAS, pursuant to SRTA’s Title VI policies, a public comment period was held from November 14, 2017 to December 15, 2017 and a public hearing was held on December 5, 2017 regarding the proposed elimination of magnetic fare tickets from the *Xpress* fare system no earlier than December 31, 2018 and a proposed reduction of the Green-Zone Calendar Monthly fare product from \$100 to \$90 (collectively, the “Proposed Changes”); and

WHEREAS, 66 comments were received from the public during the public comment period and public hearing; and

WHEREAS, staff conducted a Title VI fare equity analysis and found no adverse impacts on minority and low-income riders due to the Proposed Changes, and presented this analysis to the GRTA Board;

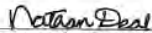
WHEREAS, by Resolution dated January 10, 2018 (attached), the GRTA Board recommended that the SRTA Board to approve the Proposed Changes.

NOW, THEREFORE, BE IT RESOLVED:

1. that the elimination of magnetic fare tickets from the *Xpress* fare system no earlier than December 31, 2018 is approved; and
2. the reduction of the Green-Zone Calendar Monthly fare product from \$100 to \$90 is approved.

APPROVED this 31st day of January 2018.

STATE ROAD AND TOLLWAY AUTHORITY

By: 
Governor Nathan Deal, Chairman

Attest:


Christopher Tomlinson, Secretary