



## **TITLE VI PROGRAM**

**Original Document Date: 3/9/2016**

**Revised Document Date: 3/15/2019**

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**RESOLUTION OF THE  
GEORGIA REGIONAL TRANSPORTATION AUTHORITY**

**APPROVING THE 2019 UPDATE TO THE TITLE VI PROGRAM AND FOR OTHER PURPOSES**

**WHEREAS**, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and 23 CFR part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin;

**WHEREAS**, the FTA requires that the Georgia Regional Transportation Authority (GRTA) demonstrates compliance with such federal laws and regulations by submitting a Title VI Program once every three years;

**WHEREAS**, the GRTA Title VI Program must be considered and approved by the GRTA Board of Directors;

**WHEREAS**, revisions demonstrating compliance with Title VI laws and regulations have been made to key elements of GRTA's Title VI Program including the Notice to Public, Complaint Procedures and Forms, Public Participation Plan, and Limited English Proficiency Plan;

**WHEREAS**, GRTA seeks to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;

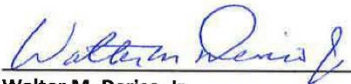
**WHEREAS**, GRTA seeks to promote full and fair participation in public transportation decision making without regard to race, color, or national origin;

**WHEREAS**, GRTA seeks to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

**WHEREAS**, an inclusive public participation process consistent with federal and GRTA policies was undertaken prior to Board consideration of the Title VI Program.

**NOW THEREFORE BE RESOLVED**, that the Board of Directors of GRTA approves the attached 2019 update to the Title VI Program.

**SO RESOLVED** this 13<sup>th</sup> day of March 2019.

  
Walter M. Deriso, Jr.  
Chair

APPROVED AS TO FORM:

  
Merryl Mandus  
General Counsel

Attest:

  
Jamie Harris  
Board Secretary

## General Requirements and Guidelines

The Georgia Regional Transportation Authority (GRTA) 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. GRTA'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.

GRTA ceased operation of all transit services on July 1, 2017, and those operations were transferred to the State Road and Tollway Authority (SRTA). Pursuant to a Memorandum of Understanding, SRTA agreed to provide and deliver certain services on GRTA's behalf. SRTA has a separate Title VI policy that was previously approved by its Board. GRTA remains a distinct entity for purposes of regional transportation planning and federal grantee status.

### A. Statement of Policy

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. GRTA 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 GRTA's policy that all contractors, subcontractors, and subrecipients shall adopt Title VI policies and shall implement procedures to ensure that GRTA's services are provided without discrimination on the basis of race, color, or national origin.

### B. Notice to Public

GRTA's *Statement of Policy* shall be published on the GRTA webpage of the SRTA website. A copy of the *Statement of Policy* is included in **Appendix A** of this document.

### C. Title VI Complaint Procedures and Forms

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

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

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

### E. Public Participation Plan

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

### F. Limited English Proficiency Access Plan

GRTA 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).

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

## G. GRTA Board Structure

The 15 GRTA board members are appointed by the Governor. There are no vacant seats as of January 2019.

	Caucasian	African American	Asian/Indian American	Native American/Alaskan	Pacific Islander	TOTAL
Board	11 73.33%	3 20.00%	1 6.67%	0 0.00%	0 0.00%	15 100.00%
<i>Executive Committee</i>	4 100.00%	0 0.00%	0 0.00%	0 0.00%	0 0.00%	4 100.00%
<i>Projects and Planning Committee</i>	8 80.00%	1 10.00%	1 10.00%	0 0.00%	0 0.00%	10 100.00%
<i>Operations and Finance Committee</i>	4 57.14%	2 28.57%	1 14.29%	0 0.00%	0 0.00%	7 100.00%
<i>Land Development Committee</i>	4 100.00%	0 0.00%	0 0.00%	0 0.00%	0 0.00%	4 100.00%
<i>Conflicts Advisory Committee</i>	2 100.00%	0 0.00%	0 0.00%	0 0.00%	0 0.00%	2 100.00%
<i>RHST Committee</i>	3 75.00%	1 25.00%	0 0.00%	0 0.00%	0 0.00%	4 100.00%

In addition to the GRTA Committees, GRTA appoints two of its Board members to serve on advisory committees at the Atlanta Regional Commission (ARC), the Metropolitan Planning Organization (MPO) for the region. The appointee to the Community Resources Committee is an Asian/Indian American male, while the appointee to the Transportation and Air Quality Committee is a Caucasian female.

Per the efforts made to encourage the participation of minorities on such committees, see below the process of appointment of board members detailed in Senate Bill 57, Code Section 50-32-4:

*"The initial board of directors of the authority shall consist of 15 members. All members of the board and their successors shall be appointed for terms of five years each, except that the initial terms for eight members of the board appointed in 1999 shall be three years each; and the particular beginning and ending dates of such terms shall be specified by the Governor. All members of the board shall be appointed by the Governor of the State of Georgia and shall serve until the appointment and qualification of a successor, the provisions of subsection of [Code Section 45-12-52](#) to the contrary notwithstanding; except as*

*otherwise provided in this Code section. Said members shall be appointed so as to reasonably reflect the characteristics of the general public within the jurisdiction or potential jurisdiction of the authority, subject to the provisions of subsection of this Code section. No person holding any other office of profit or trust under the state shall be appointed to membership. The chair of the board of directors shall be appointed and designated by the Governor.*

*All successors shall be appointed in the same manner as original appointments. Vacancies in office shall be filled in the same manner as original appointments. A person appointed to fill a vacancy shall serve for the unexpired term. No vacancy on the board shall impair the right of the quorum of the remaining members then in office to exercise all rights and perform all duties of the board."*

#### H. Subrecipient Assistance and Monitoring

GRTA provides assistance to subrecipients as applicable to ensure compliance with Title VI general reporting and other requirements. GRTA monitors subrecipients in accordance with monitoring procedures included in Appendix D, Section D.

#### I. Determination of Site

GRTA does not own, control, or maintain any property.

#### J. GRTA Title VI Program Adoption

GRTA conducted a public comment period that began on January 28<sup>th</sup>, 2019 and ended on February 26<sup>th</sup>, 2019. GRTA also held a public hearing on February 13<sup>th</sup>, 2019. The hearing was split into two sessions, 11:00 AM to 2:00 PM and 5:00 PM to 8:00 PM. The two sessions were intended to provide more opportunities for the public meet with GRTA staff during the lunch period as well as in the evening. During the 30-day public comment period and public hearing, GRTA did not receive any comments for the proposed Title VI Program.

GRTA's Board of Directors approved the 2019 Title VI Program update during their regularly scheduled meeting on March 13, 2019.

# GEORGIA REGIONAL TRANSPORTATION AUTHORITY

## TITLE VI

### Statement of Policy

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

The Georgia Regional Transportation Authority (GRTA) 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.

GRTA'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 GRTA 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 GRTA's civil rights program or to obtain a Complaint form, please visit [srta.ga.gov/accessibility-and-civil-rights/](http://srta.ga.gov/accessibility-and-civil-rights/) or contact customer service at 844-977-7742. Complaints should be filed in writing to the following:

GRTA Civil Rights Officer  
Georgia Regional Transportation Authority  
245 Peachtree Center Ave., Suite 2200  
Atlanta, GA 30303  
[titleVI@srta.ga.gov](mailto:titleVI@srta.ga.gov)

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

如果需要在另一种语言的信息，请联系 844-977-7742

정보가 다른 언어로 필요한 경우 844-977-7742 로문의바랍니다.

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

## Appendix B – Complaint Procedures and Complaint Form

### Title VI Complaint Procedures

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

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the Georgia Regional Transportation Authority (GRTA) 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 [srta.ga.gov/accessibility-and-civil-rights](http://srta.ga.gov/accessibility-and-civil-rights) or request the complaint form from GRTA'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 will 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, GRTA 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:

GRTA Civil Rights Officer  
Georgia Regional Transportation Authority.  
245 Peachtree Center Ave NE, Suite 2200  
Atlanta, GA 30303  
Phone: 844-977-7742  
[TitleVI@srta.ga.gov](mailto:TitleVI@srta.ga.gov)

The GRTA Civil Rights Officer must acknowledge receipt of an emailed complaint within one working day of receiving it. The complainant should contact GRTA's Civil Rights Officer if an acknowledgment was not received within this time period to confirm whether GRTA'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 GRTA Civil Rights Officer will begin an investigation within fifteen (15) working days of receipt of a complaint.
5. The GRTA 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 GRTA Title VI Officer may administratively close the complaint.
6. The GRTA 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 GRTA Civil Rights Officer will advise complainants of their appeal rights to the appropriate federal agency.
10. GRTA 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 sub-recipient in response to the complaint.

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

如果需要在另一种 语言的信息 · 请联系 844-977-7742。

정보가다른언어로필요한경우 844-977-7742 로문의바랍니다.

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

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## Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Two Executive Orders extend Title VI protections to Environmental Justice, which also protects persons of low income, and Limited English Proficiency (LEP).

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

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

OR

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

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

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

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

☐ Race/Color  
☐ National Origin

7. Date(s) of incident resulting in discrimination: \_\_\_\_\_
8. Describe the discrimination. What happened, where, and who was responsible? For additional space, attach additional sheets of paper or use back of form.

9. Did you file this complaint with another federal, state, or local agency, or with a federal or state court? (Check appropriate space) ☐ Yes ☐ No

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

Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency \_\_\_\_\_

State Court \_\_\_\_\_ Local Agency \_\_\_\_\_ Other \_\_\_\_\_

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

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Were there any witnesses? ☐ Yes ☐ No

If yes, please provide contact information:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Date Filed: \_\_\_\_\_

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

---

Complainant

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

如果需要另一种语言的信息，请联系(404) 893-2100。

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

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

## Appendix C – Public Participation Plan

### **Georgia Regional Transportation Authority Public Involvement/Public Participation Plan**

The Georgia Regional Transportation Authority (GRTA) is a Federal Transit Administration (FTA) grant recipient and this Public Participation Plan has been adopted by the GRTA Board. The GRTA Board of Directors is established by state law and its members are appointed by the Governor.

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

The Georgia Regional Transportation Authority (GRTA) is strongly committed to seeking and encouraging public participation in the planning process. The overall goal of the GRTA 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 service change and to effectively engage minority, low-income, and limited English proficient populations in the public decision-making process. GRTA engages in public outreach to ensure that its stakeholders receive information regarding the status of the relevant project or service change 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 1-844-977-7742 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 GRTA'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 GRTA Public Participation Plan is intended to document GRTA's activities to meet these federal requirements.

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

GRTA 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.

Additionally, GRTA endeavors to ensure comments received by GRTA are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions and that opportunities to participate are accessible physically, geographically, temporally, linguistically and culturally.

### **IV. DEFINITIONS**

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

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

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Minority persons means the following:

American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American, which refers to people having origins in any of the Black racial groups of Africa.

Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

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

## V. Population Demographics

### A. Minority Populations

Using the American Community Survey 5-year estimates (2017), GRTA 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.

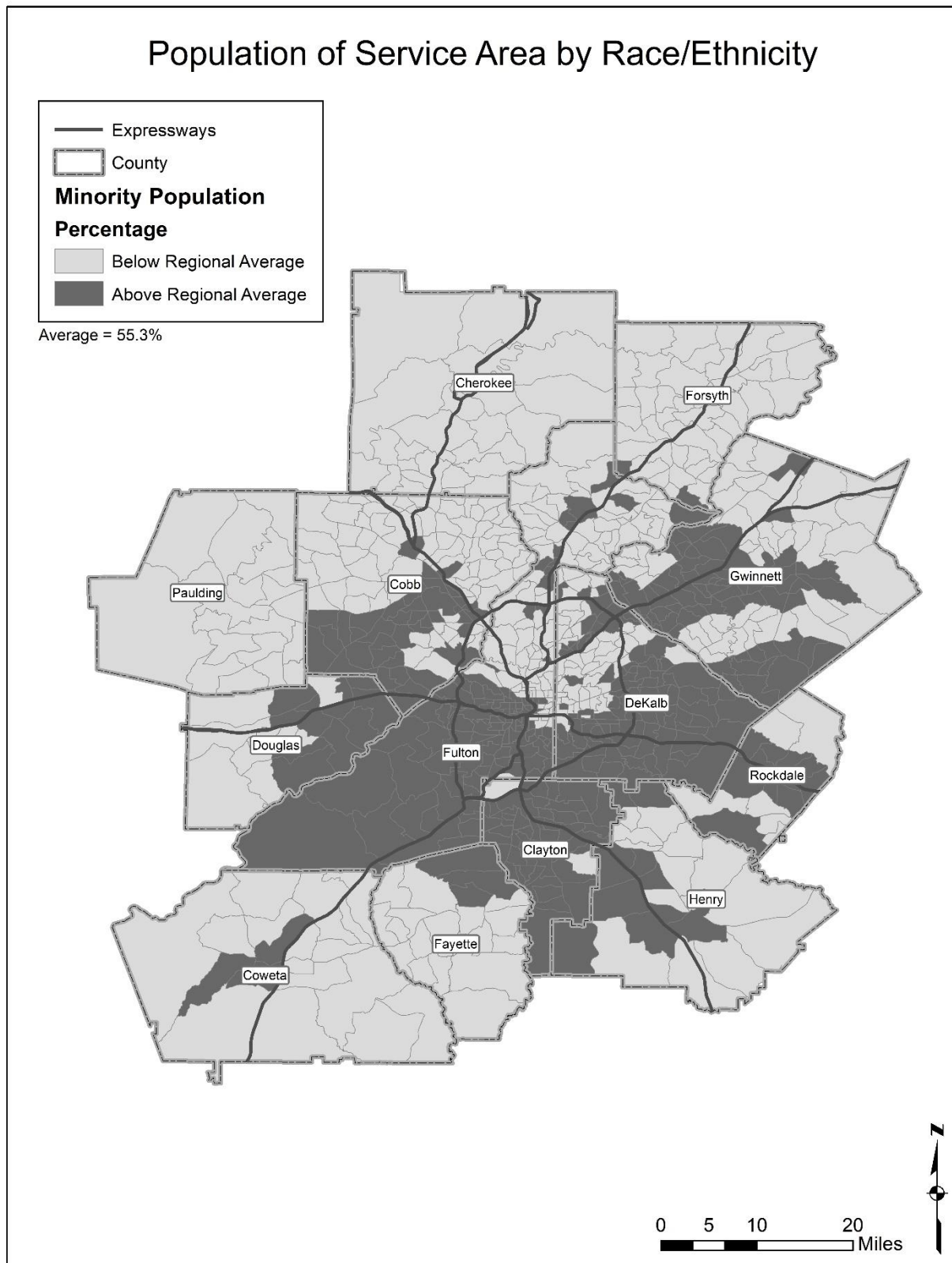
Table 1: Minority Population by County in Xpress Service Area

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%
<b>Total 13-counties</b>	<b>4,943,718</b>	<b>2,733,546</b>	<b>2,210,172</b>	<b>55.3%</b>
Source: American Community Survey 5-Year Estimates, 2017, data table DP05 *Minority Population is defined as individuals whose race is not White Non-Hispanic				

It should be noted that the previous analysis of race/ethnicity completed in 2016 found a minority proportion of 47%. As it is unlikely for the population in the same area to have changed drastically in the intervening time, it is likely that the earlier analysis did not distinguish ethnicity in the form of Hispanic/non-Hispanic from the race “White.” The table above excludes persons with Hispanic backgrounds from the race “White” to better reflect the proportion of minority population in the 13-county area.

The following map depicts the census tracts in the 13-county area with a higher concentration of minority populations than the service 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 Service Area



## A. Low-Income Populations

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

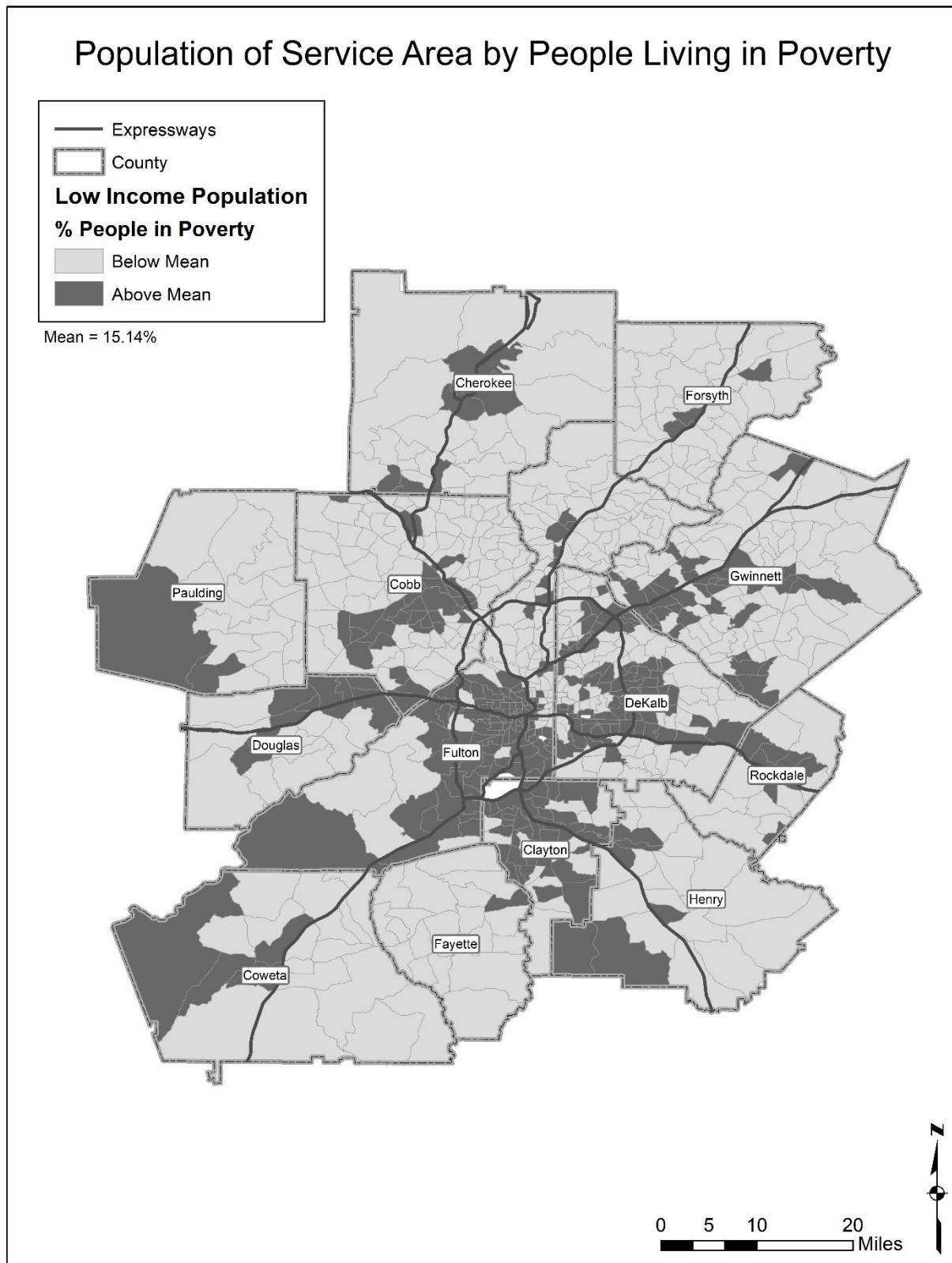
Table 2: Low-Income Population by County in 13-County Service Area

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 shows the areas of the GRTA service area that have higher concentrations of people living in poverty when compared to the average for area. Areas to the South and West of the central business district as well as along the interstate corridors and have a higher concentration of people living below poverty.



Figure 2: Low Income Population in Service 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."

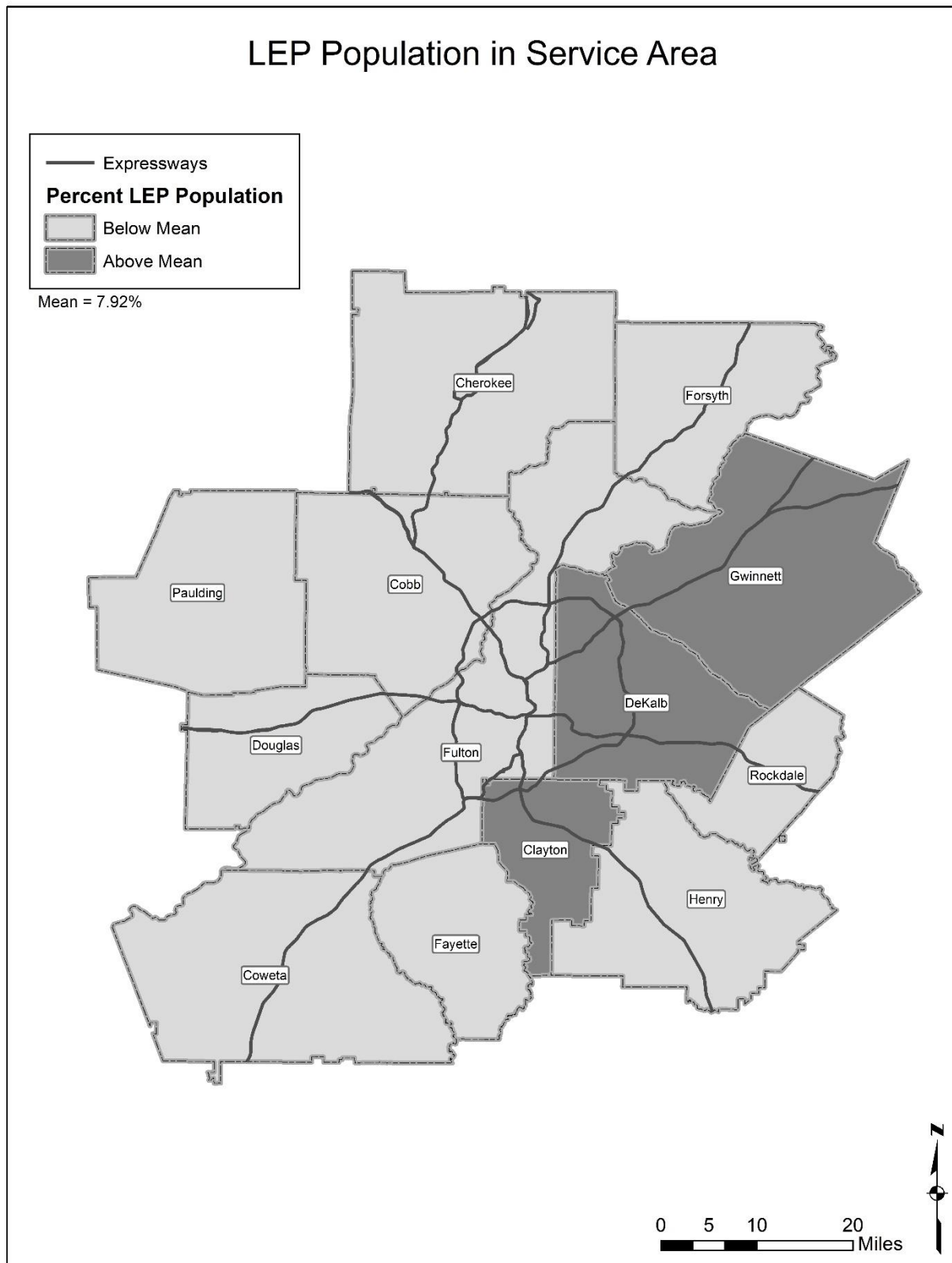
According to the ACS, of the total population over the age of five in the 13-county area (4,619,393):

- 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 3: 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 5: LEP Population by County in Service Area



## VI. Public Participation Methods

GRTA strives to proactively promote public involvement and to inform the public of current initiatives, programs, and issues. The following are examples that GRTA may use to inform, reach out to invite participation, and to seek public input. They identify 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.

1. **Printed Materials Produced by GRTA** - Outreach information can be publicized in printed materials produced by GRTA.
2. **GRTA Website** - The GRTA website, <https://www.srta.ga.gov/georgia-regional-transportation-authority/> is a communications tool providing substantial information about GRTA policies, strategies, plans, and methods. The GRTA website provides the option to translate web pages into multiple languages.
3. **Media Targeted to Ethnic Communities** - Participation opportunities are publicized through newspaper publications serving primarily English and Spanish speaking audiences. GRTA also publicizes in other ethnic community media when applicable.
4. **Informational Public Meetings** – GRTA conducts several different types of meetings. Meetings are designed to engage the public to provide their input, testimony, or comments regarding proposed changes. Venues for meetings should be fully accessible for persons with disabilities, and in general served by public transit. It is typical to conduct a series of meetings on a single topic. GRTA 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. GRTA secures meeting venues with consideration to time of day, length of time required for the meetings, transportation options, and the number of expected attendees.

### 4a. 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.
5. **Translation and Interpretive Services** – GRTA 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.

Staff uses some of the examples described in this Public Participation Plan when carrying out the public involvement activities for GRTA.

### **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 GRTA, 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, GRTA provides an opportunity for public participation by conducting a 30-day public comment period and one public hearing, at a minimum.

#### **I. 30-Day Public Comment Process**

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

1. Post notices to inform the public on the GRTA 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 GRTA 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 GRTA Board of Directors.

#### **II. Public Hearing**

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

1. 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; and
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 GRTA Board of Directors is scheduled to address the issues under review.

### III. 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 two weeks' notice. All requests for alternative formats for hearing materials and publications should be submitted to the Office of Communications and Engagement, Georgia Regional Transportation Authority, at GRTA's headquarters address as listed on its website in writing at least 4 working days prior to the hearing date.

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

GRTA currently has subrecipients that operate transit services. The subrecipients are FTA direct recipients and as such maintain and are responsible for compliant Title VI programs. However, GRTA, through the shared services component of the subgrant agreement with the State Road and Tollway Authority (SRTA) provides oversight for the public involvement activities associated with contracted transit operations.

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 GRTA subrecipients are conducting compliant public involvement activities when making significant changes in transit services or fares. GRTA's subrecipient monitoring procedures, if applicable, include the following:

1. Request and maintain files for subrecipient Title VI programs.
2. Annual review of subrecipient/contractor Title VI programs to determine compliance with FTA requirements.
3. Develop a corrective action plan to address any deficiencies and assist as applicable to achieve compliance as required by FTA C. 4702.1B Chapter III 12.
4. Conduct on-site reviews to ensure compliance with program implementation activities such as posting of policy and training.

## Appendix D – Limited English Proficiency Access Plan

### I. Introduction

The Georgia Regional Transportation Authority (GRTA) 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, GRTA 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.

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

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

GRTA does not operate transit service and has few opportunities for direct interaction with the public. GRTA’s major functions encompass two programs: Evaluation of Developments of Regional Impact (DRI) that fall within the 13-county jurisdiction, and approval of the Transportation Improvement Program (TIP)

for the Atlanta region in conjunction with the Atlanta Regional Commission (ARC), the Metropolitan Planning Organization (MPO). The public engagement process for approval of the TIP is administered by ARC and supported by GRTA where appropriate. Regularly scheduled meetings of the GRTA Board of Directors are open to the public and GRTA welcomes comments by the public at the beginning of each meeting. In the past year, GRTA has not received any request for public comment at any of the regularly scheduled Board meetings.

Although GRTA does not have frequent, direct contact with the public or with the limited-English proficient community, population data provided by the American Community Survey helps GRTA understand which languages other than English are predominantly spoken in the 13-county area and can inform future decisions to 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 GRTA jurisdiction age 5 or older speak English less than “very well.” Table 1 evaluates the LEP population according to the primary language spoken at home, indicating that the LEP persons most likely to be encountered by GRTA are those who speak Spanish (4.56% of the region’s population), Vietnamese (0.50%), Korean (0.47%), and Chinese (0.44%).

Table 1 – Language Spoken at Home by Population 5 Years and Over that Speak English Less than Very Well

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

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			
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 1 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 come in contact with GRTA in different ways: via telephone with customer service, in-person at GRTA Board meetings, at public meetings, or through the GRTA website. These four primary points of contact are monitored by GRTA to estimate the frequency with which LEP persons come into contact with the Authority. Monitoring occurs via an evaluation of call center data, website traffic, and attendance at publicly accessible meetings. Based on information collected, GRTA has very minimal interaction with LEP persons.

GRTA utilizes Google Translate on its website to assist LEP persons. A summarization of usage from Jan 1, 2018 to Dec 20, 2018 showed that there were 1,649 page views to the GRTA webpage. As the GRTA webpage is part of the larger SRTA website, GRTA-specific usage statistics of the translation tool are unavailable. However, in the same time period, the website was translated into a language other than English 1,538 times out of just over 59,000 website visits; a webpage translation rate of 2.6%.

Lastly, the Call Center tracks usage of Language Line translation services. The Call Center is shared between GRTA and SRTA, the operator of the Xpress commuter bus service, vanpool, and Peach Pass. On average, the Call Center receives approximately 45,000 calls per month, or 540,000 calls per year. For state fiscal year 2019 (beginning on July 1, 2018), the Language Line service was used a total of 134 times.

Collectively, the monitoring results indicate that GRTA has relatively infrequent interaction with LEP individuals.

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

GRTA's key programs, DRI evaluation and TIP approval, are important programs toward improving transportation access and mobility in the Atlanta area. However, these same programs have very limited, direct interaction with the general public and the LEP community.

**Factor 4: The Resources Available to GRTA and Overall Cost**

To assist LEP persons, GRTA 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 total costs associated with GRTA'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 training staff. If needed, additional resources can be allocated to translation services.

**Conclusion**

The Four Factor Analysis outlined above indicates that GRTA has relatively infrequent interaction with LEP individuals. Although the Atlanta region has a sizable LEP population, particularly among Spanish-speakers, GRTA has few programs that have direct interaction with the general public. Despite the limited interactions, GRTA is committed to providing meaningful access to LEP individuals through GRTA'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 GRTA 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 LEP Access Plan, GRTA has focused on the points of potential contact and interactions with LEP individuals and communities. The points of contact identified are by telephone (call center), in-person (customer service center, public meetings/hearings), and via the GRTA website. The appropriate type of LEP assistance varies depending on the interaction point.

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

- Telephone: The call center provides multiple options to communicate with LEP individuals. These include:
  - The use of an automated system with choices of English or Spanish assistance, as Spanish is the alternative language with which the Authority has the most frequent interaction.
  - Upon reaching the call center, operators have been trained to assist LEP individuals by connecting them with the Language Line interpretation service.
- In-Person: There are primarily two types of in-person interactions: face-to-face encounters at GRTA Board meetings, and at public meetings and hearings. Regardless of the specific location, there are several ways in which GRTA seeks to communicate with LEP individuals. These include:
  - The use of "I Speak" cards. These are available at the Customer Service Center and are present with staff at all public meetings/hearings. 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 Customer Service staff have access to the GRTA 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 Chinese, Korean, Spanish, and Vietnamese 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: The Customer Service Center utilizes the Language Line service to provide language assistance as necessary.
- In-Person: Customer Service Center staff and staff representing GRTA at public meetings/hearings 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 GRTA website.

- Website: The GRTA website provides language assistance with the use of Google Translate. It provides fully translatable HTML text in Spanish, Korean, Chinese, and Vietnamese. Text on the website, which is viewable via Google Translate, directs LEP individuals to the Customer Service Center contact information so that additional assistance may be provided through Language Line.

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

GRTA regularly evaluates the effectiveness of the LEP Access Plan including:

- The automated telephone assistance line is monitored for 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 GRTA. Additionally, this information specifically identifies the language requested by the caller.
- Customer Service Center employees are verbally surveyed to determine their level of interaction with LEP individuals. Additionally, Customer Service staff maintains a telephone log of their contact with individuals and note 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 customers. 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., Customer Service representatives, public meeting/hearing representatives, 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 GRTA 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 GRTA 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 GRTA Title VI Officer.

GRTA Civil Rights Officer  
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