

Georgia Regional Transportation Authority



TITLE VI PROGRAM

Anticipated Board Approval Date: **March 8, 2023**

Highlighted areas of this document will be finalized, with highlights removed upon adoption.

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General Requirements and Guidelines

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's federally assisted programs and projects consist of existing grant awards with remaining funds.

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, subgrantees 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 in public facing offices and on the GRTA and SRTA websites at [srta.ga.gov](https://www.srta.ga.gov) (<https://www.srta.ga.gov/accessibility-and-civil-rights/>). 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* included 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 in GRTA activities/programs. 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 (see O.C.G.A. § 50-32-4). There are no vacant seats as of May 2022.

Table 1: GRTA Board Demographics

2022 Board	Caucasian	African American	Asian/Indian American	Total
Members	13	1	1	15
Percent	86.6%	6.7%	6.7%	100%

The GRTA Board members are appointed in the following manner, per O.C.G.A. § 50-32-4:

“50-32-4. Membership; terms; appointment; expenses; removal; applicability of Chapter 10 of Title 45; meetings; voting; assignment.

(a) 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 and shall serve until the appointment and qualification of a successor, the provisions of subsection (b) 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 (d) 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.

(b) 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.

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

(d) Members of the board of directors may be removed by executive order of the Governor for misfeasance, malfeasance, nonfeasance, failure to attend three successive meetings of the board without good and sufficient cause, abstention from voting unless authorized under subsection (g) of this Code section, or upon a finding of a violation of Code Section 45-10-3 pursuant to the procedures applicable to that Code section. A violation of Code Section 45-10-3 may also subject a member to the penalties provided in subparagraphs (a)(1)(A), (a)(1)(B), and (a)(1)(C) of Code Section 45-10-28, pursuant to subsection (b) of Code Section 45-10-28. In the event that a vacancy or vacancies on the board render the board able to obtain a quorum but unable to obtain the attendance of a number of members sufficient to constitute such supermajorities as may be required by this chapter, the board shall entertain no motion or measure requiring such a supermajority until a number of members sufficient to constitute such supermajority is present, and the Governor shall be immediately notified of the absence of members.

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

Article 3 of Chapter 5 of Title 21. The members of the authority shall be accountable in all respects as trustees. The authority shall keep suitable books and records of all actions and transactions and shall submit such books together with a statement of the authority's financial position to the state auditor on or about the close of the state's fiscal year. The books and records shall be inspected and audited by the state auditor at least once in each year.

(f) Meetings of the board of directors, regular or special, shall be held at the time and place fixed by or under the bylaws, with no less than five days' public notice for regular meetings as prescribed in the bylaws and such notice as the bylaws may prescribe for special meetings. Each member shall be given written notice of all meetings as prescribed in the bylaws. Meetings of the board may be called by the chairperson or by such other person or persons as the bylaws may authorize. Notice of any regular or special meeting shall be given to the Governor at least five days prior to such meeting, unless the Governor waives such notice requirement, and no business may be transacted at any meeting of the board unless and until the Governor has acknowledged receipt of or waived such notice.

(g) All meetings of the board of directors shall be subject to the provisions of Chapter 14 of this title. A written record of each vote taken by the board, specifying the ye or nay vote or absence of each member as to each measure, shall be transmitted promptly to the Governor upon the adjournment of each meeting. No member may abstain from a vote other than for reasons constituting disqualification to the satisfaction of a majority of a quorum of the board on a record vote."

H. Subrecipient Assistance and Monitoring

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

GRTA currently has one subrecipient, MARTA, which is also a Direct Recipient of FTA funding. Because FTA conducts oversight of all Direct Recipients during the Triennial Review, ATL review is not required. Annual review is not required if the subrecipient is also a Direct Recipient.

I. Determination of Site

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

J. GRTA Title VI Program Adoption

The GRTA Board plans to take action on the proposed GRTA Title VI Program during their regularly scheduled meeting on March 8, 2023. GRTA will be conducting a public comment period from February 6, 2023 through March 7, 2023 and a public hearing on February 22, 2023.

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

Appendix A – Notice to Public

GRTA

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."

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

Filing a Discrimination Complaint

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, or national origin may file a Title VI complaint. Complaints may be filed directly to 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 the GRTA's civil rights program or to obtain a Complaint form, please visit <https://srta.ga.gov/grta/> or contact the GRTA Title VI line at (404) 893-2100. Complaints should be filed in writing to the following:

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

Or

Title VI Program Coordinator
Federal Transit Administration
East Building, 5th Floor-TCR

1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

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

如果需要一种语言的信息，请联系 (404) 893-2100.

정보가 다른 언어로 필요한 경우 (404) 893-2100 로문의바랍니다.

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

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Appendix B – Complaint Procedures and Complaint Form

Title VI Complaint Procedures

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

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the 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 <https://srta.ga.gov/grta> 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 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, 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
GRTA.
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
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

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 Civil Rights 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. The 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 subrecipient in response to the complaint.

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

如果需要一种语言的信息 · 请联系 (404) 893-2100。

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:

GRTA Civil Rights Officer
GRTA
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
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) 893-2100 로 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 (GRTA) Public Involvement/Public Participation Plan

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

I. Goals and Guiding Principles

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 program 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 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 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 Developments of Regional Impact (DRI)¹ and for the Atlanta region's Transportation Improvement Program (TIP)² which GRTA reviews and approves. This includes input from low-income, minority and LEP populations, through the public participation methods identified in Section VI.

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

IV. DEFINITIONS

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

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

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by the Infrastructure Investment and Jobs Act (IIJA): "...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

¹ Per state law (OCGA §50-32-14), GRTA is required to review all Developments of Regional Impact (DRIs) within its 13-county metro Atlanta jurisdiction. GRTA's purpose is to evaluate the proposed development's effect on the surrounding transportation infrastructure and to identify options to mitigate current and future impacts to mobility using best-practice standards for transportation and land use.

A DRI is a large, master-planned development that exceeds a threshold size and land use type determined by the Georgia Department of Community Affairs. The Regional Commission determines if the project warrants a DRI review. GRTA reviews all DRIs as determined by the Regional Commission. GRTA and the Regional Commission coordinate to maximize the time and information provided and work together to involve partner agencies, adjacent local governments and the applicant's consultant team.

² The Transportation Improvement Program (TIP) allocates federal funds for use in the construction of the highest-priority projects in the Regional Transportation Plan (RTP), the long-term transportation vision for the 20-county region. Projects included in the TIP must be fully funded.

The Atlanta Regional Commission, the federally designated Metropolitan Planning Organization for the 20-county Atlanta region, is responsible for developing and updating the TIP and RTP to meet federal planning requirements and address local needs. (<https://atlantaregional.org/transportation-mobility/transportation-planning/tip-amendment/>)

HHS poverty guidelines. GRTA uses household income of less than \$45,000 per year as the low-income threshold.

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

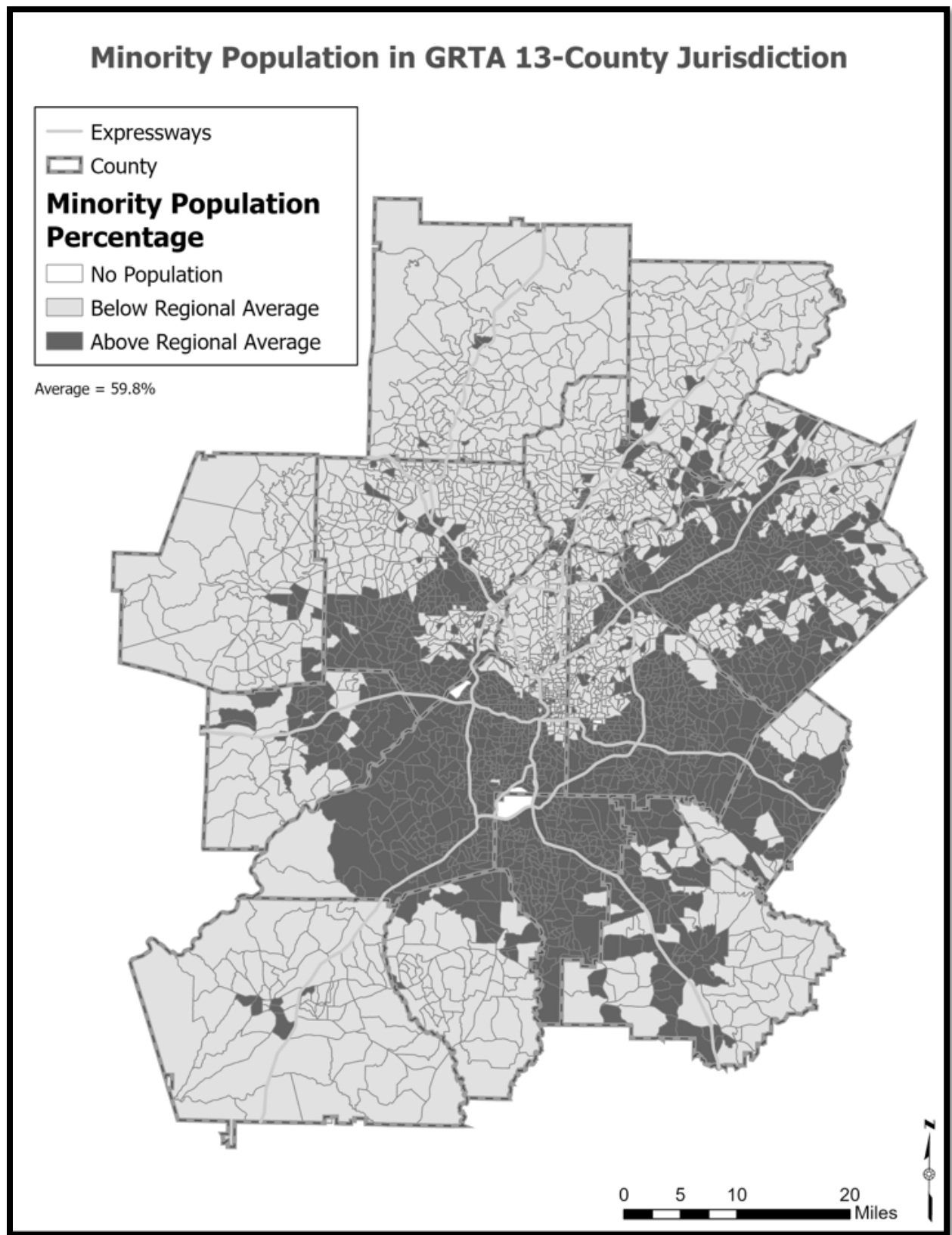
Using the American Community Survey 5-year estimates (2020), GRTA has determined that 59.8% of the population for all counties within the 13-county jurisdiction are of a minority race/ethnicity. In this case, "minority" is defined as any individual not classified as white, non-Hispanic. Table 2 shows the proportion of minority/non-minority for each county in the 13-county jurisdiction.

Table 2: Minority Population by County in GRTA 13-County Jurisdiction

County	Total Population	Minority Population	Non-Minority Population	Percent Minority Population
Cherokee County	266,620	68,753	197,867	25.8%
Clayton County	297,595	271,693	25,902	91.3%
Cobb County	766,149	396,967	369,182	51.8%
Coweta County	146,158	46,737	99,421	32.0%
DeKalb County	764,382	548,487	215,895	71.8%
Douglas County	144,237	94,360	49,877	65.4%
Fayette County	119,194	51,050	68,144	42.8%
Forsyth County	251,283	91,876	159,407	36.6%
Fulton County	1,066,710	661,917	404,793	62.1%
Gwinnett County	957,062	646,479	310,583	67.5%
Henry County	240,712	154,415	86,297	64.1%
Paulding County	168,661	60,217	108,444	35.7%
Rockdale County	93,570	69,070	24,500	73.8%
GRTA 13-County Jurisdiction	5,282,333	3,162,021	2,120,312	59.8%
Source: U.S. Census Bureau, 2020 Census Redistricting Data, table P2				
*Minority Population is defined as individuals whose races are not White and/or Non-Hispanic alone				

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

Figure 1: Minority Population in GRTA 13-County Jurisdiction



B. Low-Income Populations

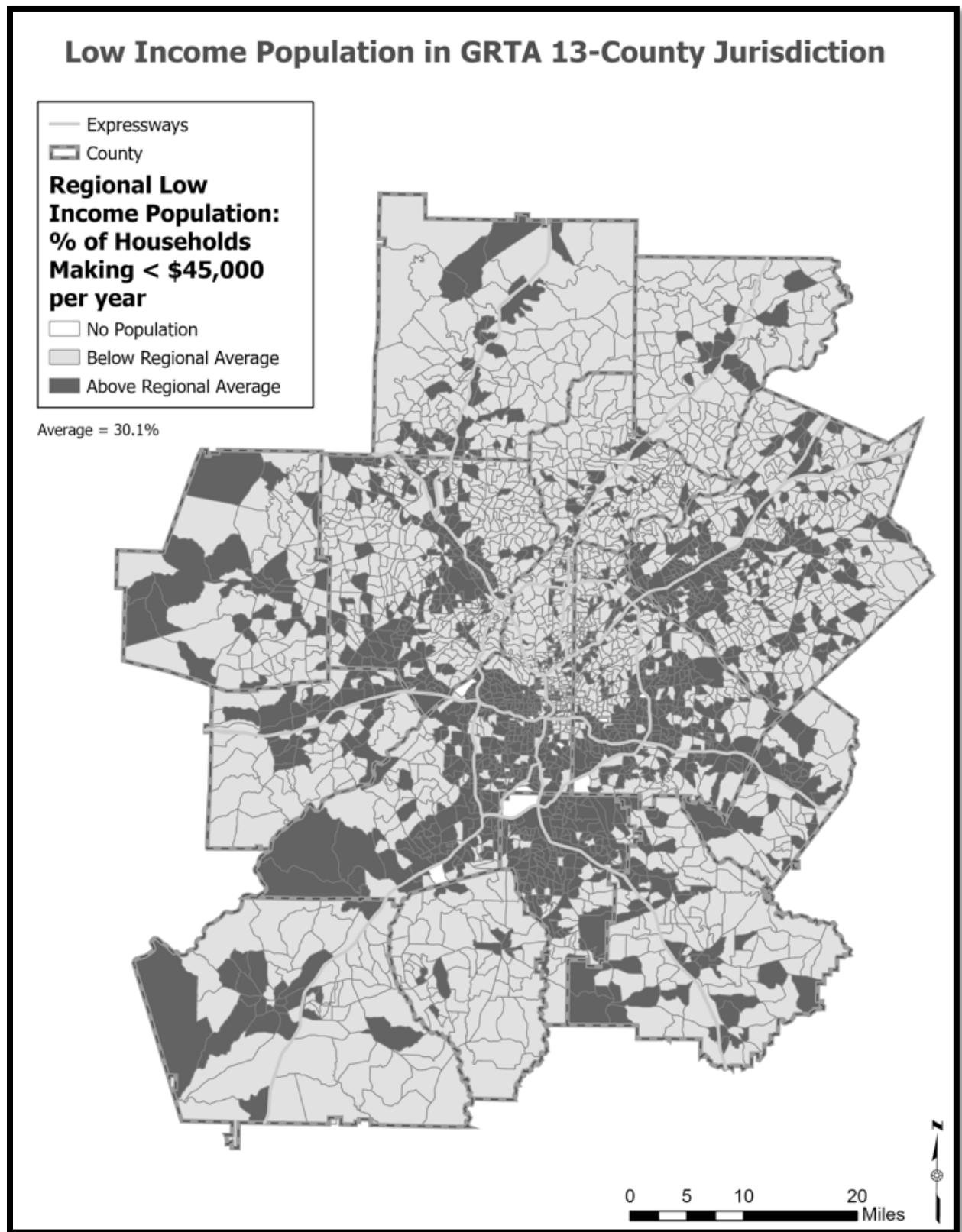
Using the American Community Survey 5-year estimates (2020), GRTA has determined that 30.1% of the population for all counties within the 13-county jurisdiction are below the locally defined low-income threshold. In this case, “low-income household” is defined as households making less than \$45,000 per year. Table 3 presents the low-income population by county within the GRTA 13-county jurisdiction.

Table 3: Low-Income* Population by County in GRTA 13-County Jurisdiction

County	Percent Population with low-income (%)
Cherokee County	24.4%
Clayton County	45.3%
Cobb County	25.7%
Coweta County	26.8%
DeKalb County	35.1%
Douglas County	33.1%
Fayette County	19.2%
Forsyth County	16.8%
Fulton County	32.6%
Gwinnett County	28.9%
Henry County	27.3%
Paulding County	24.9%
Rockdale County	34.5%
GRTA 13-County Jurisdiction	30.1%
Source: American Community Survey 5-Year Estimates (2020), table B19001	
*Low-income Population is defined as households making less than \$45,000 per year	

The following map shows the census block groups of the GRTA jurisdiction that have higher concentrations of people below the low-income threshold when compared to the average for the GRTA 13-County jurisdiction. Areas to the South and West of the central business district as well as along the interstate corridors generally have a higher concentration of households making less than \$45,000 per year.

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



C. Limited English Proficient Populations

The United States Census' most recent American Community Survey (ACS) 5-year estimates (2020) offer a current and reliable estimate of the number, proportion, and geographic distribution of Limited English Proficiency (LEP) individuals in the GRTA 13-county jurisdiction. Specifically, the estimate shows persons 5 years or older where the language spoken at home is not English and English is spoken "Less than very well."

According to the 2020 ACS 5-years estimates of the total population over the age of five in the GRTA 13-county jurisdiction (4,833,579):

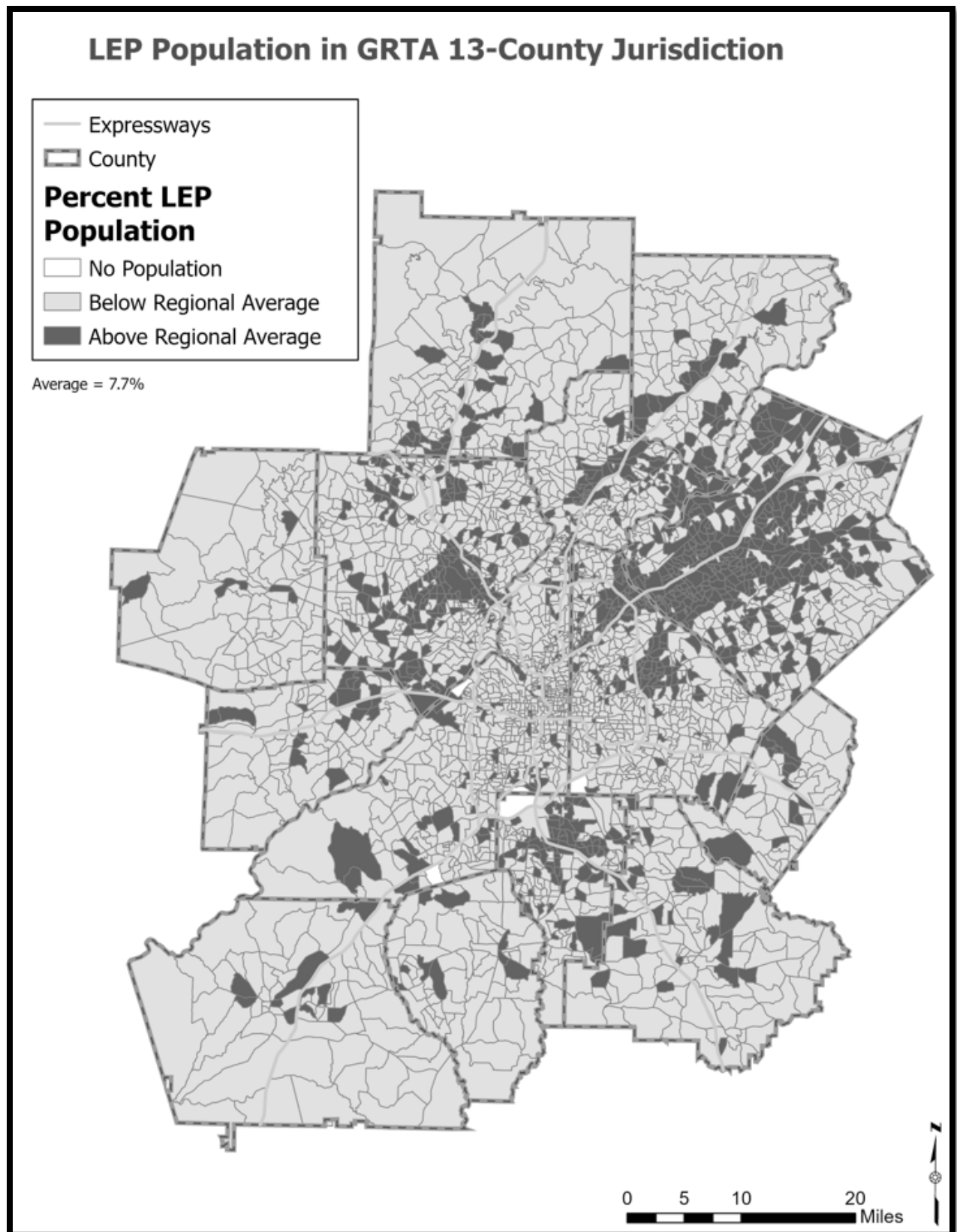
- Approximately 19.8% (955,694) speak a language other than English at home; and
- Approximately 7.7% (370,969) speak English less than "very well"

Table 4: LEP Population* by County in GRTA 13-County Jurisdiction

County	Total Population of Speaking Age (5 Years and Older)	LEP Population	Percent LEP Population (%)
Cherokee County	238,875	11,768	4.9%
Clayton County	265,889	24,413	9.2%
Cobb County	710,233	49,527	7.0%
Coweta County	137,185	4,339	3.2%
DeKalb County	702,759	58,543	8.3%
Douglas County	136,211	6,480	4.8%
Fayette County	108,463	3,994	3.7%
Forsyth County	222,422	13,626	6.1%
Fulton County	990,461	49,465	5.0%
Gwinnett County	865,453	133,239	15.4%
Henry County	216,771	8,038	3.7%
Paulding County	153,915	2,823	1.8%
Rockdale County	84,942	4,714	5.6%
GRTA 13-Counties Jurisdiction	4,833,579	370,969	7.7%
Source: American Community Survey 5-Year Estimates (2020), table B16004			
*LEP Population is defined as individuals who are 5 years or older where the language spoken at home is not English and English spoken "Less than very well."			

The following map shows the census block groups of the GRTA jurisdiction that have higher concentrations of LEP populations when compared to the average for the GRTA 13-County jurisdiction. The map shows that areas of Clayton, DeKalb, and Gwinnett Counties have a higher percentage of LEP populations when compared to the 13-county average.

Figure 3: LEP Population in GRTA 13-County Jurisdiction



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. 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 GRTA:** Outreach information can be publicized in printed materials produced by GRTA.
- **GRTA Website:** The GRTA website, <https://srta.ga.gov/grta/> 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.
- **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 outlets and through social media platforms when applicable.
- **Informational Public Meetings:** GRTA conducts different types of informational public meetings. Meetings are designed to engage the public in providing their input, testimony, or comments regarding proposed projects, policies, and plan changes. Venues for meetings should be fully accessible for persons with disabilities and are generally located in areas served by public transit. It is typical to conduct meetings commensurate with the complexity or scale of the 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 communities in the 13-county region. 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.
 - **Meeting Formats**
 - **Informational Open House:** This format provides opportunities for participants to receive information at their own pace by visiting a series of information stations that may include tabletop displays, maps, Power Point presentations, photographs, visualizations, and other tools. Participants have the opportunity for one-on-one conversations with the appropriate staff. Occasionally open houses include a short educational presentation followed by a discussion period for comments and questions and answers. Participants are often given comment forms to provide written comments. Staff is available to take verbal comments and transcribe them to provide a written record.
 - **Public Hearings:** Public hearings are conducted to obtain formal comments for the public record. They are typically conducted with a hearing officer and as applicable a court reporter who will transcribe any public comments. When no court reporter is present, meetings are recorded.
 - **Virtual Open House/Public Hearings:** Due to unforeseen circumstances such as the COVID-19 health emergency and various mandated restrictions that may be enacted within the GRTA jurisdictional boundaries due to these circumstances, open houses and/or public hearings may be presented in virtual format. Virtual meetings provide opportunities commensurate with in-person meetings to the

extent practical and attainable. Formal comments are recorded as part of the virtual meeting forums.

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

- **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.
- **Other Partner Agency Events** – GRTA participates in and attends partner agency meetings that may include the abovementioned communication methods to provide public involvement activities relevant to GRTA's functions. An example of this is the Atlanta region MPO's extensive public involvement outreach for the TIP.

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 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.

- ***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/or 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.

- **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 proposed changes to policies, projects and/or programs, detailing the reasoning behind the proposal to the public;
2. Opportunity for public comment that allows members of the general public an opportunity to express their views;
3. A court reporter, if determined as applicable, will be present to record comments from members of the public who prefer to provide direct, oral comments. When no court reporter is present, meetings are recorded. The recording serves as the official public record.
4. Public hearings will be of public record and open to all members of the public. All public hearings must be recorded and transcripts available to the public upon request.

Public hearings are typically held within the 30-day public comment period but may begin before the period formally starts and extend after the period has ended; so long as the last hearing is held prior to the day in which the GRTA Board is scheduled to address the issue(s) 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, at GRTA's headquarters address (245 Peachtree Center Ave NE, Suite 2200) or email address (TitleVI@atltransit.ga.gov) in writing at least 4 working days prior to the hearing date.

D. GRTA Oversight of Subgrantees, Subrecipients, Contractors, and Subcontractors

The GRTA will monitor subgrantees, 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 involvement activities of and maintaining the records necessary for documenting that GRTA subrecipients are conducting compliant public involvement activities, to include, if applicable, if making significant changes in transit programs, 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 subgrantees/subrecipients/contractors/subcontractors Title VI programs to determine compliance with FTA requirements. Annual review is not required if the subrecipient is also a Direct Recipient of federal financial assistance.
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 Section 12.
4. Conduct on-site reviews, as applicable, to ensure compliance with program implementation activities such as posting of policy and training.

Appendix D – Limited English Proficiency Access Plan

I. Introduction

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 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 GRTA activities by LEP persons.

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

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

- Review and approval of the Atlanta Metropolitan Planning Organization's Transportation Improvement Program (TIP).
- Developments of Regional Impact (DRI) evaluations.
- Monitoring existing federal grants and subgrantees, subrecipients, contractors and subcontractors.

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

Although the GRTA's opportunities for contact with the public are different than regional transit operators, GRTA does interact and partner with agencies that may have frequent direct contact with underserved populations such as the LEP community. The population data provided by the American Community Survey helps the GRTA 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 2020, 7.7% percent of the residents of the 13-county GRTA 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 GRTA are those who speak Spanish (4.28% of the region's population), Indo-European languages (0.71%), Vietnamese (0.57%), Chinese (0.45%), and Korean (0.40%).

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	263,620	207,087	470,707	43.99%	4.28%
Indo-European languages	84,884	34,145	119,029	28.69%	.71%
Vietnamese	16,660	27,305	43,965	62.11%	.57%
Chinese (incl. Mandarin, Cantonese)	20,665	21,565	42,230	51.07%	.45%
Korean	18,959	19,514	38,473	50.72%	.40%
Other and unspecified languages	57,173	18,822	75,995	24.77%	.39%
Other Asian and Pacific Island languages	43,806	18,227	62,033	29.38%	.38%
French, Haitian, or Cajun	32,353	8,544	40,897	20.89%	.18%
Russian, Polish, or other Slavic languages	15,647	7,377	23,024	32.04%	.15%
Arabic	11,605	5,213	16,818	31.00%	.11%
Tagalog (incl Filipino)	5,900	1,859	7,759	23.96%	.04%
German or other West Germanic languages	13,453	1,311	14,764	8.88%	.03%

Source: ACS 2020, Table B16004: Age by 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 five language groups spoken at home that make up the largest LEP populations in the 13-county area, Vietnamese languages has the highest rate of limited English proficiency at 62.11%, followed by Chinese at 51.07%. This information further exemplifies the need for translation services for Vietnamese and Chinese languages speakers.

Factor 2: Frequency of Contact with LEP Individuals

Individuals are able to engage with the GRTA in four primary ways:

- via telephone with GRTA staff
- email with GRTA staff
- in-person at GRTA Board meetings, public meetings, other agency events, community outreach events
- or through the GRTA website.

These primary points of contact are monitored by the GRTA 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 GRTA utilizes Google Translate on its website to assist LEP persons. The GRTA will track and record the number of page views to the GRTA webpage, including the number of times the website is translated into a language other than English. This tracking will allow the GRTA 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 GRTA's key functions, referenced in the Factor 1 Section above, are important activities for improving and maintaining regional transit access and mobility in the Atlanta metropolitan area through:

- Ensuring grant awards are implemented effectively and in compliance
- Evaluating the impact of major developments on mobility access
- Reviewing and approving programming of regional funding to maintain and expand mobility access

Because GRTA 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 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 GRTA, pursuant to a MOU with the State Road and Tollway Authority (SRTA), has access to various translation services. The total costs associated with GRTA's LEP monitoring, and outreach efforts are estimated to be \$5,000 each year. These include the shared 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 GRTA has opportunities for direct interaction with the Atlanta region's sizable LEP population. These opportunities to potentially impact persons in the LEP community are found through GRTA's role as the responsible agency for review and approval of the TIP that includes oversight of federal/state transit funding. Therefore, 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 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 (direct call to GRTA via contact information provided on website and outreach material), in-person (public meetings/hearings, community outreach, partner agency events), 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 GRTA website and other distributed GRTA 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 GRTA Board meetings, public meetings and hearings, community outreach and partner agency events. 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 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 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 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 GRTA 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 GRTA website.
- **Website:** The GRTA 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 GRTA 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 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 GRTA. 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., GRTA 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 may 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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