



City of Atlanta

TITLE VI PLAN

for Transit Services



Produced by:

City of Atlanta

Office of Contract Compliance &

Department of Public Works

Submitted to the Federal Transit

Administration

June 2014



TABLE OF CONTENTS

INTRODUCTION..... 1

GENERAL REQUIREMENTS 3

CITY of ATLANTA’S PUBLIC PARTICIPATION PLAN 5

LANGUAGE ASSISTANCE PLAN 9

LIMITED ENGLISH PROFICIENCY IMPLEMENTATION PLAN 15

DECISION MAKING BODIES 17

SERVICE STANDARDS & POLICIES..... 18

PROGRAM SPECIFIC REQUIREMENTS 21

GRANTS, REVIEWS and CERTIFICATIONS 21

CONTACT..... 22

LIST OF TABLES AND FIGURES

Table 1: Largest group of persons with LEP - 2011 American Community Survey 10

Figure 1: Percentage of Spanish Population that Speak Less Than Very Well..... 11

Figure 2: Percentage of Limited English Speakers 12

Table 2: City of Atlanta’s Decision Making Bodies 17

Table 3: Passenger Vehicle Load 18

Table 4: Proposed Monitoring Service Standard Schedule..... 19

APPENDICES

- APPENDIX A TITLE VI Complaint Procedures
- APPENDIX B TITLE VI Complaint Form



INTRODUCTION

City of Atlanta's Commitment to Civil Rights

The development of the City of Atlanta's (City's) Title VI Plan is being prepared as a part of the city's submission for grantee status from the Federal Transit Administration (FTA). This is a result of the city receiving federal funding for the design, construction and eventual operations administration and oversight of the Atlanta Streetcar Project with revenue passenger service to begin in the spring of 2014.

This plan is being prepared to ensure that the level and quality of the City of Atlanta's transit services are provided in a nondiscriminatory manner and full, fair participation is offered to residents, visitors and commuters who will use the city's transit services.

The City is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of the City's services on the basis of race, color, or national origin. The contents of this plan have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

Title VI of the Civil Rights Act of 1964

"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."

Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency)

"Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them."

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), the City has an obligation to ensure that:

- The benefits of its transit services are shared equitably throughout the service area;
- The level and quality of transit services are sufficient to provide equal access to all riders in its service area;



City of Atlanta Title VI Plan

- No one is precluded from participating in City's transit service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

The city will engage the public in the development of this plan. The service standards detailed in this plan, along with the public engagement process and the events triggering public outreach will be presented and discussed at a public information meeting in the winter of 2013. To develop a system to provide services to those with limited English proficiency, the City proposes to engage with a number of community organizations as service begins in the spring and summer of 2014.

The City's Streetcar Subcabinet has been and continues to be actively involved in the development of this plan. The Subcabinet will review and approve the process and procedures by which the public will be engaged in completing the Title VI Plan. The plan will be approved by the Subcabinet in fall 2013. This plan contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service.

The analysis contained in this plan are based upon data from the most recent (Year 2010) U.S. Census and 2011 American Community Survey's (ACS) 2007-2011 five (5) year estimates.



GENERAL REQUIREMENTS

Notice to the Public

To inform the riders of the City's new transit service, the City's commitment to Title VI compliance, and their right to file a civil rights complaint, the City will present the following language in both English and Spanish, on the city's website, the Atlanta Streetcar website, and on posters within the transit vehicles as well as any City of Atlanta transit stops/centers:

Your Civil Rights

The City of Atlanta operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City. For more information on the City's civil rights program and the procedures to file a complaint, please contact 404-330-6010; or visit the Office of Contract Compliance at Atlanta City Hall, 55 Trinity St SW, Atlanta, GA 30303 from 8:30 am to 4:30 pm Monday through Friday. For more information about the City's programs and services, visit www.atlantaga.gov. If information is needed in another language, please contact (404) 330-6010.

Discrimination Complaint Procedures

The City of Atlanta has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by the City may file a Title VI complaint by completing and submitting the Title VI Complaint form available at Atlanta City Hall or on our website www.atlantaga.gov.

The procedure

Civil rights complaints should be filed immediately. However, the City's Title VI Coordinator will investigate complaints up to 180 days after the alleged occurrence or incident.

The complaint may be sent or faxed to the following address:

**Title VI Coordinator
City of Atlanta Office of Contract Compliance
55 Trinity Avenue SW
Atlanta, GA 30303.
(404) 330-6010
(404) 685-7359 (fax)**

The City will process complaints that are complete. Once the complaint is received, the City will review it and the complainant and respondent will receive an acknowledgement letter within five calendar days informing them whether the complaint will be investigated by the City of Atlanta.



The City has up to 180 days to investigate the complaint. If more information is needed to resolve the case, the City's investigator may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If the City's investigator is not contacted by the complainant or does not receive the additional information within thirty days, the City can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: A closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she or he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

With the start of this transit service, the City of Atlanta will maintain a list of future investigations to be conducted by FTA and entities other than FTA, including lawsuits and complaints naming the City of Atlanta that allege discrimination on the basis of race, color or national origin. This list will include the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the City of Atlanta in response, or final findings related to the investigation, lawsuit, or complaint.

To date, the City of Atlanta has not received any complaints which allege discrimination on the groups of race, color, national origin or any other form of discrimination.



CITY OF ATLANTA'S PUBLIC PARTICIPATION PLAN

Key Principles

The City of Atlanta's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in City's transit service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence the City's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- The City will seek out and facilitate the involvement of those potentially affected.

Through an open public process, the City has developed a public participation plan to encourage and guide public involvement efforts and enhance access to City's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals and outreach methods that the City uses to reach its riders.

The steps outlined in the public participation plan will offer (in the planning process), various opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions within the City of Atlanta. The guide sets the approach for how the City will engage its diverse community. The City may continue to improve its public involvement activities over time based on feedback from all of its riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.

Goals of the Public Participation Plan

The overarching goals of City's PPP, which will be presented for public review in the winter of 2013 include:

- **Accessible.** Every reasonable effort will be made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Collaborative.** The City will establish and maintain partnerships with collaborating agencies, communities, and groups through the methods proposed in its public participation plan.
- **Diverse.** Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency
- **Open.** A visible and open process will ensure the involvement of traditionally underserved and underrepresented populations.

The City will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route or service is established;
- An existing route is proposed for elimination;



- Any system-wide change in service hours that exceeds (plus or minus) 25% of current total service hours;
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way trips by more than 25% of the current number of transit trips.
- For minor schedule and service changes not rising to the level of those above, the City will post service change notices on vehicles and stops 30 days in advance of the change date where possible.

Outreach Efforts – Alerting Riders and Encouraging Engagement

The City's Public Participation Plan includes many mediums that will extend beyond the traditional approach of legal notices and intermittent media coverage. The city will use a variety of communication methods that are widely used by members of the community.

The outline below provides a proposed set of general steps for engaging riders in the decision making process using a fare or service change as an example.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. An internal review by the appropriate committees is conducted (for example, the City's Streetcar Subcabinet Committee, detailed later in this program, will review all service change proposals);
3. Proposals will then be reviewed by either the City's Planning Advisory Board (APAB) or a proposed Passenger Advisory Group (PAG);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the City's Streetcar Subcabinet Committee is sought to proceed to a public comment period;
6. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the initial transit service area;
7. Bilingual (English and Spanish) public outreach materials and a program are developed;
8. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
9. An e-mail is transmitted to the City's community partners and NPU Chairs;
10. Local radio station or local television station (via local access channel 26) interviews may be conducted (if available);
11. The public comment period ends;
12. A summary package is presented detailing the outcome of the public participation process along with staff recommendations to the Streetcar Subcabinet Committee;
13. The final service/fare change date is set;
14. Outreach is conducted in advance of any service or fare change;
15. Bilingual system timetable and website updated in advance of the proposed change.



Selection of Meeting Locations

When determining locations and schedules for public meetings, the City of Atlanta will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

City of Atlanta Mediums (Bi-lingual)

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board vehicles (interior) and at transit stops
- Website – The City has assembled a comprehensive website with automatic alerts
- Social Media – Continued use of the Atlanta Streetcar Facebook page (2,600+fans) and the Atlanta Streetcar Twitter page (750+ followers) since 2009 to help engage community
- Email – The City has an email address that will be able to send out information to readers
- Radio and Television (if available and appropriate)
- Seat Drops, On-board Flyers – The City proposes to regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- On- board Scrolling messages
- Direct Mail to Community Partners
- Public Information Sessions
- Public Hearings
- Legal Notices



Addressing Comments

All comments received through the public participation plan will be given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments will be assembled into a single document for presentation the Streetcar Subcabinet Committee for consideration.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, the City has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of City's community stakeholders can be obtained by contacting the Streetcar Public Relations Liaison.

Stakeholder List

Any community organization or person can be added to the City's stakeholder list and receive regular communications regarding service initiatives and changes by contacting the Marketing and Communications Manager – Transit Division in the Department of Public Works office at (404) 330-6501. Local organizations and businesses can also request that a speaker from the City's attend their regular meeting at the same number or through the City's website (<http://www.atlantga.gov>) or through the Atlanta Streetcar's website (<http://www.theatlantastreetcar.com/>).



LANGUAGE ASSISTANCE PLAN

An element of the City's Title VI Plan, the City has prepared a Limited English Proficiency (LEP) Plan. This addresses the city's responsibilities, as a future recipient of federal funding, in providing language assistance to LEP persons. In order to ensure meaningful access to programs, activities and services, the City uses the information obtained in a Four Factor Analysis to determine the specific language services the city will seek to implement. This analysis will help the City determine the best approach to communicate effectively with LEP persons.

The Four Factor Analysis, as prescribed by the U. S. DOT, is an assessment that considers:

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

Factor 1 - Number of LEP Persons in initial service area and citywide

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter the City's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the City evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau "American Fact Finder" web portal data from 2013. Data was also obtained from the Atlanta Regional Commissions Data and reviewed for the initial project service area as well as the City of Atlanta in its entirety.



Factor 1: Number or proportion of LEP persons eligible to be served or likely to encounter the City’s programs, activities or services.

Citywide Overview

The City of Atlanta encompasses a 133 square mile area of Fulton County with a portion of the city within the boundaries of DeKalb County. Atlanta and the region are home to a diverse population speaking more than 35 languages. Of the total City population (403,572), 3.88% (15,645) residents report speaking English less than very well.

Initial Service Area

The initial transit service area comprises of a 3.2 square mile area of the city that includes a portion of Downtown Atlanta and Oakland, Old Fourth Ward and Sweet Auburn neighborhoods.

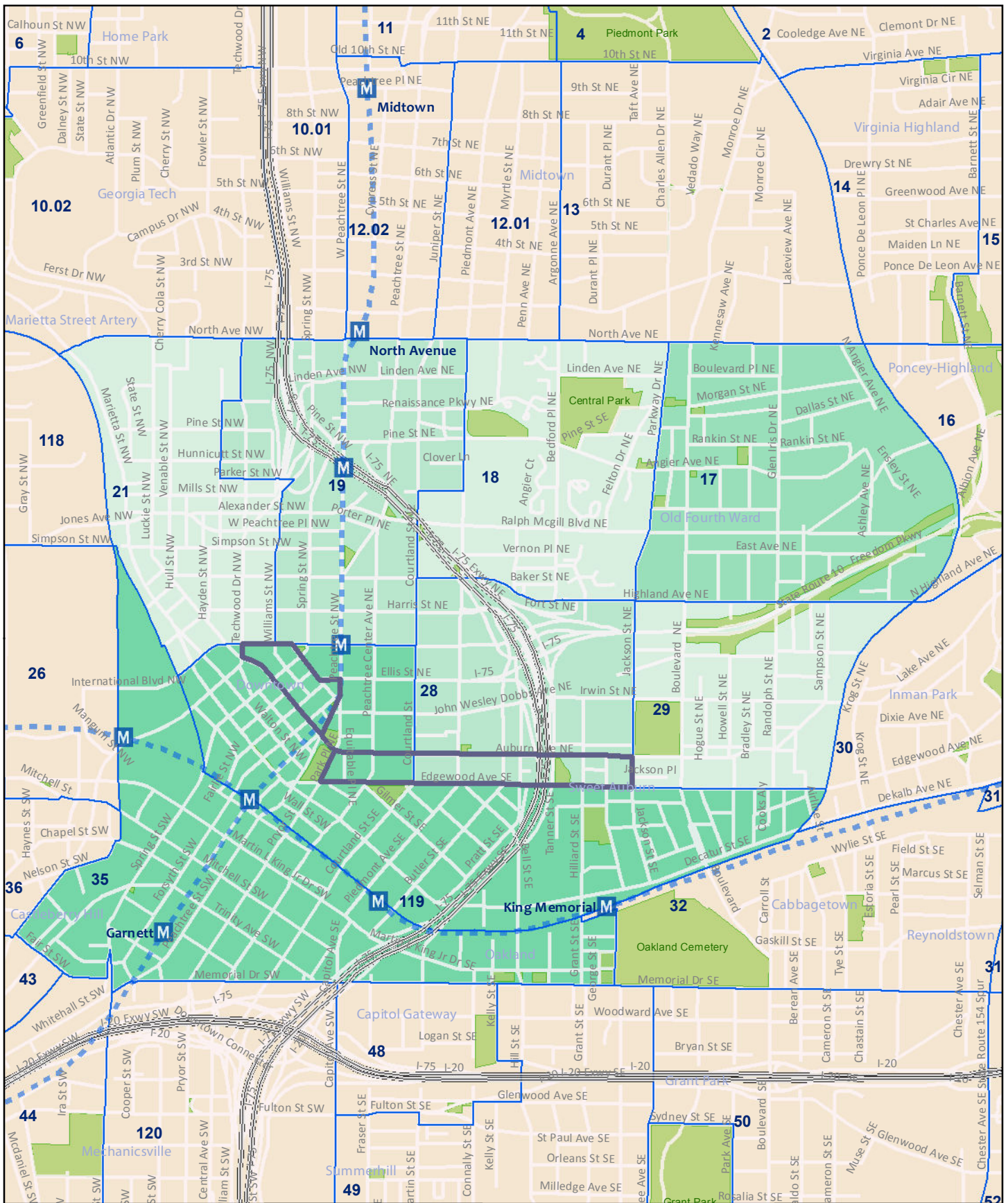
In review of census data within the initial service area, of the 20,641 residents within the initial service area, 4.4% (926) residents report speaking English less than very well.

- Review U.S. Census Data: A review of data from Census 2010 and the 2007-2011 American Community Survey’s five (5) year estimates identified a statistically significant representation of Spanish speaking individuals, who spoke English less than well or were linguistically isolated. Table 1 contains the census data on English proficiency within the City, as well as the census tracts within the service area. Figure 1 illustrates the concentration of Spanish persons that speak English less than very well within the initial service area. Figure 2 illustrates the concentration of the city’s population that speaks English less than very well.

Table 1: Largest group of persons with LEP - 2011 American Community Survey

Language Spoken at Home Population 5 years and over (Percent)				
	Language Other than English, Speak Less than Very Well	Spanish, Speak English Less Than Very Well	Other Indo European Languages, Speak English Less than Very Well	Asian/Pacific Islander, Speak English Less than Very Well
City of Atlanta	0.2%	2.2%	0.6%	0.7%
Streetcar Service Area	1.2%	1.8%	0.8%	0.6%

Source: ACS 2007-2011 Five Year Estimates (S1601 – Language Spoken at Home), Accessed June 2013

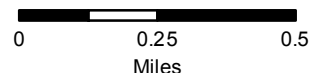


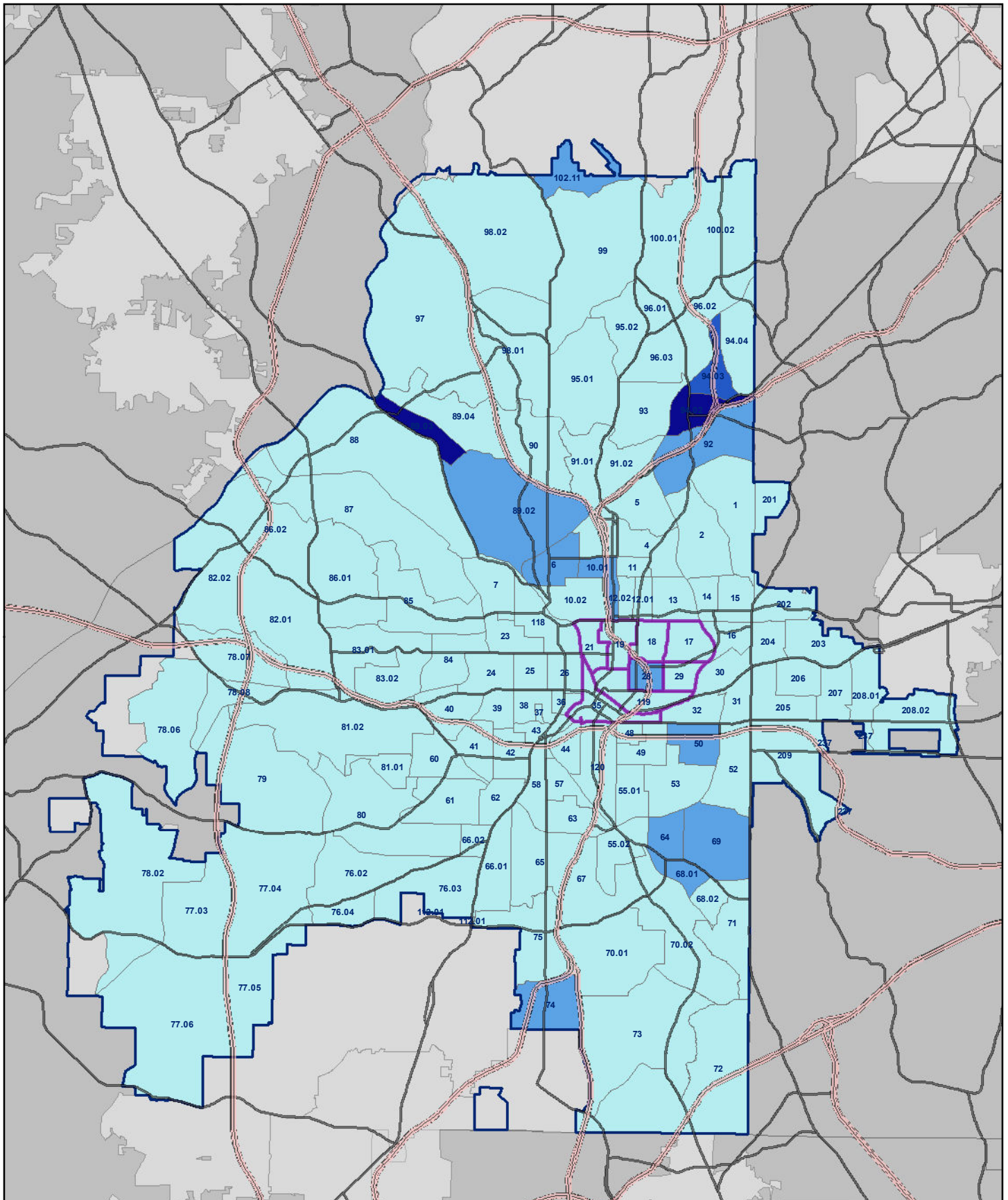
Atlanta Streetcar Project
Title VI Plan - LEP Analysis

Figure 1:
Percent of Spanish
Population that Speak
English Less than Very Well

Legend

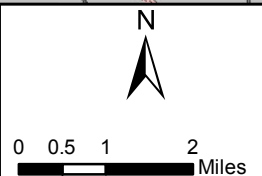
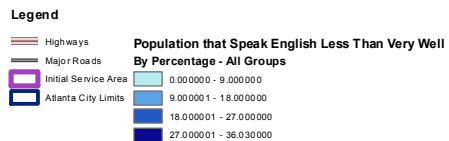
- MARTA Rail Stations
 - Atlanta Streetcar Route
 - MARTA Rail Lines
 - 2010 Census Tracts
- | Initial Service Area | |
|---|-----------|
| Percentage that speak less than very well | |
| | 0 - 0.4 |
| | 0.4 - 2.2 |
| | 2.2 - 3.1 |
| | 3.1 - 5.1 |





Atlanta Streetcar Project
Title VI Plan - LEP Analysis

Figure 2:
Percent of Total
Population that Speak
English Less than Very Well





- **Examine Prior Experiences:** Discussions with the City’s customer service representatives within the Department of Public Works, Watershed Management and Office of Constituent Services confirmed frequent and consistent encounters with Spanish speaking individuals, who have little or no English proficiency. In most cases, the communications relate to street maintenance concerns and water bill payment inquiries.
- Discussions with our partner cities and stakeholders revealed that their data and experience also indicate a need to provide Spanish speaking individuals with information in their native language. Consequently, the City works with the Hispanic Chamber of Commerce and social service agencies to ensure that the needs of these individuals, especially those with LEP are met.
- **Review Regional Demographic Information:** A review of regional demographic trends provided by the Atlanta Regional Commission confirmed the migration of Spanish speaking individuals in various portions of the region, with a small increase within the City.

Factor 2: Frequently with which LEP Individuals come into contact with the City’s Programs, Activities and Services

Discussions with the City’s customer service representatives and call centers indicate frequent interactions with solely Spanish speaking individuals only. These individuals are regular users of the City’s customer hotline services. City staff has had no interaction with linguistically isolated individuals who speak languages other than Spanish.

Discussions with regional transit providers within the service area indicate some interaction with individuals able to only speak other languages; however, these individuals are not frequent users of transit services within the City’s region.

It is anticipated that the size of the LEP population will continue to increase and, as a result, so will the probability of future contact with the City. As the program expands, the City will continue to monitor requests for language assistance in evaluating the effectiveness of outreach to these populations.

Based on Factor 2 and the other discussions herein described, no other language or population group was consistently identified as an eligible participation group.

Factor 3: Nature and importance of the program, activity or service provided to the LEP population.

The service most likely to encounter LEP individuals is the Department of Watershed Management’s customer service call center.

Currently, the City does not offer City owned fixed route and demand response public transportation services. These services are currently provided by the Metropolitan Atlanta Rapid Transit Authority (“MARTA”), which affords clientele access to healthcare, employment and educational opportunities. Critical information that can affect access to these services includes route and schedule information, fare and payment information, demand response information and application, compliant and commendation forms and the system’s code of conduct.



The impacts of future transportation improvements resulting from federal funding to the City will have an impact on all residents, and the City will make all efforts to encourage an understanding of the process and opportunities to comment. As a result, the City is concerned with input from all stakeholders and utilize all resources to ensure that the planning process as inclusive as possible. Based on the Factor 3 analysis, Spanish speaking individuals were the only LEP population identified.

Factor 4:

Resources available to and overall costs to provide LEP assistance.

Assessing available resources is an ongoing activity and inclusive of identifying the availability of staff and volunteer language interpreters, the amount paid professional interpreter and translation services, identifying appropriate documents for translation and the examination of appropriate financial and in-kind sources needed. Typically, translation is priced as a per-word cost, based on the number of words in the original source content. For professional translation via a translation agency, costs may vary, depending on the language, turnaround times and specialized content. The City is committed to providing professional and cost-effective language services.

The City will assess available resources that may be used to provide LEP assistance, including, but not limited to:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff
4. Providing notice to LEP persons of the availability of language assistance
5. Monitoring and updating the LEP plan.

Due to the City's unique approach in providing public transportation services, and the current limited size of the City's resources, the City will coordinate and collaborate with its partner, the Atlanta Downtown Improvement Agency, and other community organizations and social service agencies, to provide assistance to LEP persons. There are many community agency partners available to work with the City for translation or interpreter needs. The primary partners are the Latin American Association (LAA) and the Center for Pan Asian Community Services (CPACS). The LAA offers professional, certified translations of a wide variety of documents from Spanish to English, English to Spanish, English to Portuguese and Portuguese to English. Every translation from the LAA is signed and notarized, with a certificate of translation. The CPACS serves Asians from different cultural and linguistic backgrounds and many are LEP. Their diverse staff of more than 100 full- and part-time employees is capable of speaking 15 different languages. Both the Latin American Association (www.thelaa.org) and the Center for Pan Asian Community Services (www.icpacs.org) are organizations with longstanding ties to the City.

The City will weigh the costs and benefits of translating documents for potential LEP clients, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical information, the likelihood of frequent changes in documents and the apparent literacy rate in an LEP group. The City presently utilizes outside translation services, with additional work provided by bilingual staff, and translated sections within existing printed materials to minimize printing costs. Future planning and capital projects will need to incorporate costs related to translation services and translated printed materials.



LIMITED ENGLISH PROFICIENCY IMPLEMENTATION PLAN

The following sections provide additional information on the provision of assistance, based on the Four Factor Analysis.

A. How to Identify a LEP Person who Needs Language Assistance:

- Post a notice of available language assistance in the Atlanta City Hall;
- Include notice of available language assistance on the City of Atlanta website;
- Insert a statement asking persons who need language assistance to make arrangements with the Title VI Coordinator within 10 days of the publication notice;
- Examine records of requests for language assistance from past meetings and events;
- Utilize the Census Bureau's "I Speak Cards" at sign-in tables for the City's sponsored events to identify language needs and direct to onsite staff interpreters, when available; this measure will also serve to identify future needs and target follow-up; The "I speak card" can be downloaded at <http://www.usdoj.gov/crt/cor/13166.htm>;
- Distribute notices of available language assistance for upcoming City sponsored public workshops, conferences or other public events to partner organizations located in or known to serve the language groups.
- When the City sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.

B. Language Assistance Measures

Spanish speaking individuals with LEP have been identified as a statistically significant population requiring the access to information in Spanish. Language assistance will be provided for LEP individuals through the translation of some key materials, as well as through oral interpretation when necessary and possible. The City in conjunction with the prospective transit operator will ensure that the following measures are in place to ensure access to these individuals and other individuals with LEP:

- The City's Title VI Policy, Complaint Form and Limited English Proficiency Plan will be updated and posted on the agency's website at www.atlantaga.gov and <http://www.theatlantastreetcar.com/>
- The City will post a Spanish translated version of any Notice to Beneficiaries, along with the English version on all City transit vehicles.
- The City will provide translations of printed materials, including service schedules, maps and other information, necessary to effectively allow LEP persons to utilize City public transportation services or have opportunities to comment on City programs and services.
- The City will provide reasonable means for an LEP individual to request public information, comment on any City program or service during the public participation process, or file a complaint to City regarding services or programs.
- The City in coordination with the prospective transit provider will determine what is needed makes every effort to hire bilingual operations staff, customer service representative and operators.



- When staff prepares a document or schedules a meeting for which the target population is expected to include LEP individuals, the documents, meeting notices, flyers and agendas will be printed in an alternative language based on the known LEP population.

C. Staff Training

LEP training will be provided to City staff responsible for transit planning and services, and transit operations personnel. Potential topic might include:

- Understanding Title VI of the Civil Rights Act of 1964 and Executive Order 13166 LEP responsibilities
- Description of language assistance services offered to the public
- Description of agencies and resources that can assist the City in service special populations, including those with LEP.
- Use of Language Identification Flashcards
- Documentation of language assistance requests
- Procedures for handling a complaint

D. Providing Notice of Available Language Service to LEP Persons

- Signs should be posted that language assistance is available in City Hall and the City's website;
- When presentations are made or planned by City staff in a geographic location with a known concentration of LEP persons, special efforts will be initiated to have meeting notices, fliers, advertisements, or agendas printed in Spanish;
- City staff will seek to coordinate with organizations such as the Latin American Association and various state and local refugee organizations to have someone available who can help interpret information. Coordination will also take place with local governments and others in the jurisdictions where the meetings are held to assess the potential for identifying interpreters.

E. Monitoring and Updating the Plan

The City will follow the Title VI Program monitoring and reporting schedule for the LEP Plan, which includes yearly reports to the USDOT and FTA. Reports will include a review of plan components addressing questions such as:

- How many documented LEP persons were encountered?
- How were the needs of LEP persons addressed?
- What is the current LEP population in the service area?
- Has the need for translation services has changed?
- Have local language assistance programs been effective and sufficient to meet the need of the LEP population?
- What is the extent of available technological, staff and financial resources?



DECISION MAKING BODIES

Non-Elected Committees and Councils

With the City of Atlanta, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a municipally appointed Board of Commissioners. City of Atlanta’s Streetcar Subcabinet Committee is composed of representatives from the City of Atlanta, the Atlanta Downtown Improvement District, the City’s Department of Public Works, and MARTA. The City also has a citizen planning committee known as the Atlanta Planning Advisory Board (APAB) and seeks to propose an external group known as the Passenger Advisory Group (PAC) who would hold ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the Atlanta Planning Advisory Board and the proposed Passenger Advisory Group are always open to the public, held at Atlanta City Hall and will be placed on our calendar of events at www.theatlantastreetcar.com.

Atlanta Planning Advisory Board (APAB)

This citizen-based board is comprised of twenty-five (25) delegates and 25 alternate delegates from each of the City’s 25 Neighborhood Planning Units (NPU). The primary mission of the Atlanta Planning Advisory Board is to facilitate citizen participation in affairs of city government by drawing on its representation from the Neighborhood Planning Unit system and elsewhere and to advise the City Administration, City Council and others on citywide issues, goals and objectives relative to Atlanta’s Comprehensive Development Plan and related concerns.

Passenger Advisory Group (PAG)

This proposed committee would be open to the public and may consist of representatives from the Downtown business community, Georgia State Students, and residents representing the neighborhoods surrounding the Atlanta Streetcar service area. Meeting may be scheduled on a monthly basis and members would discuss all aspects of the City’s transit services from the perspective of the public. This group would offer an invaluable service to the City. Membership selection and terms are to be determined by the Streetcar Subcabinet.

Table 2: City of Atlanta’s Decision Making Bodies

Body	Caucasian	African American	Asian American	Hispanic/Latino	Native American
Streetcar Subcabinet Committee	2	1	0	0	0
Atlanta Planning Advisory Board					
Transportation Committee on Council	4	2	1	0	0
Passenger Advisory Group (proposed)	N/A	N/A	N/A	N/A	N/A



SERVICE STANDARDS & POLICIES

The City has developed a set of quantifiable service standards and policies. These service standards are proposed to be approved in the winter of 2013 through a public participations process, approved by the Streetcar Subcabinet and with the input of the proposed Passenger Advisory Group (PAG).

These service standards and policies include:

- Vehicle Load
- Headways (Frequencies)
- On-time Performance (Schedule Adherence)
- Service Availability
- Vehicle Assignment Policy
- Transit Amenity Policy

Following the internal updating of these policies and standards, the City will advertised and will hold a public information session to receive comments on the proposed standards. During the session, city staff will present an overview of the components of City’s public participation process as well as the various policies and standards. A copy of the presentation will be available on-line and by request to the City.

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Table 3: Passenger Vehicle Load

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred	Average Load	Maximum Load
Siemens S70 Streetcar	60	99	159	1	N/A	N/A

Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two transit vehicles traveling in the same direction on a given route. The initial transit service, the Atlanta Streetcar route is proposed to have a 15 minute frequency.

The City will consider more frequent service if ridership levels warrant, funding levels permit and where demand dictates.



On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
- The City’s on-time performance objective is proposed to be 95% or greater.

Service Availability

Due to the City operating only one route, the initial Atlanta Streetcar route, the route will provide service to residents within Downtown and the Sweet Auburn neighborhood. In the future this will be revised to reflect any expansion of transit service provided by the City.

Vehicle Assignment Policy

With the City operating only one route, the vehicle assignment is proposed to occur on a rotating basis of the four vehicles obtained for this service. The assignment is subject to the guidelines to be agreed to between the City, and MARTA. This policy will be modified in the future to reflect any expansion of transit service provided by the City.

Transit Amenity Policy

The initial Atlanta Streetcar service will have 12 stops that have been designed and placed according to industry standards with consideration of safety and special needs. This policy in the future will be revised to reflect any expansion of transit service provided by the City.

Monitoring Service Standards

For the on-going monitoring and measurement of service standards and policies, the City proposed to use the following schedule and methods illustrated in Table 4 below.

Table 4: Proposed Monitoring Service Standard Schedule

Service Standard/Policy	Proposed Schedule	Proposed Methodology
Vehicle Load	Quarterly	Automatic Passenger Counters and Periodic Passenger Counts
Vehicle Headways	Bi-Annually	Service Planning Statistics and Ridership Analysis
On-Time Performance	Monthly	Route Checks and Operator Schedule Reports



Construction Equity Analysis

When the City plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, neighborhood transit center or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The City will follow the federal guidance provided in FTA Circular 4702.1B (October 2012).

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PROGRAM SPECIFIC REQUIREMENTS

Subrecipient Compliance

In development of the City's initial plan, the City is not engaging with any subrecipients. At such time is subrecipient is acquired or selected; the City will ensure that the proposed subrecipient develops a policy, process and procedure to ensure Title VI compliance is met.

Equity Analysis for Facility

In development of the City's initial plan, the City is not constructing a vehicle storage facility, operations center, or maintenance facility that would require performing an equity analysis.

Demographic Service Profile

Due to the City's initial service set to operate fewer than 50 vehicles in peak service, a demographic service profile was not prepared for this plan.

GRANTS, REVIEWS and CERTIFICATIONS

Pending Applications for Federal Assistance

The City has no pending applications for financial assistance from any federal agency other than the FTA.

Pending FTA Grants

The City has no pending grants with FTA.

Open FTA Grants

The City currently does not have any open grants with the FTA.

Civil Rights Compliance Reviews in the Past 3 Years

Due to this plan being the first submitted by the City, there have been no compliance reviews in the past three years.

Recent Annual Certifications and Assurances

The City will be executing its first Certification and Assurances to the FTA a part of the application for grantee status. The next opportunity will take place in fiscal year 2015.



Previous Triennial Review Findings

The City has not received a triennial review from the FTA or any federal agency to date.

CONTACT

For additional information on the City of Atlanta's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Hubert Owens, Director - Office of Contract Compliance
55 Trinity Ave SW, Suite 1700
Atlanta, Georgia 30303
Telephone (404) 330-6010

Yolanda Williams-Favors, Esq., Compliance Manager - Atlanta Streetcar Project
55 Trinity Ave SW, Suite 4310
Atlanta, Georgia 30303
Telephone (404) 330-6240

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BOARD ADOPTION of POLICY

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APPENDIX A

TITLE VI COMPLAINT FORM

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Title VI Complaint Procedures to Ensure Non-Discrimination In Federally Assisted Programs or Activities Participated in by the City of Atlanta

This document outlines the Title VI complaint procedures related to providing programs, services, and benefits of the City of Atlanta's Transit services.

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 participation in, 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 City of Atlanta's Title VI Coordinator. 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 here at www.atlantaga.gov or request the complaint form from the City of Atlanta Title VI Coordinator. The complainant may also submit a written statement that contains all of the information identified in Section 3a through 3f.
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, national origin, sex, elderly or disabled.
 - 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, City of Atlanta Title VI Coordinator. If requested by complainant, office will provide a language or sign interpreter.
 - i. The complaint may be sent or faxed to the following address:

**Title VI Coordinator
City of Atlanta Office of Contract Compliance
55 Trinity Avenue SW
Atlanta, GA 30303.
(404) 330-6010
(404) 685-7359 (fax)**



- 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.

Once a complaint is filed, the City of Atlanta Title VI Coordinator will review the complaint and determine whether it has jurisdiction to investigate the issues raised. If the city does have jurisdiction, the complainant will receive an acknowledgement letter within five (5) calendar days informing them whether the complaint will be investigated.

The City has up to 180 days to investigate the complaint. If more information is needed to resolve the case, the City's Title VI Coordinator may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If the Title VI Coordinator is not contacted by the complainant or does not receive the additional information within thirty days, the City can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the Title VI Coordinator reviews the complaint, one of two letters will be issued to the complainant: A closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If negotiations to correct a violation are unsuccessful, enforcement proceedings may be instituted.

If the complainant wishes to appeal the decision, she or he has ten days after the date of the letter or the LOF to do so.

These procedures do not limit or deny your right to a formal complaint with an outside enforcement agency.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590.



APPENDIX B

TITLE VI COMPLIANT FORM

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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."

If you believe that you have been subjected to discrimination prohibited by Title VI non-discrimination provisions or related statutes, you may file a complaint within 180 days of the date of the alleged discrimination. Complete this form and mail or deliver to:

City of Atlanta, Title VI Coordinator, Office of Contract Compliance, 55 Trinity Avenue SW, Suite 1700, Atlanta, Georgia 30303.

- 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
 - Other (please specify)

Date of incident resulting in discrimination: _____
Describe the discrimination. What happened and who was responsible? For additional space, attach additional sheets of paper or use back of form.

- 7. 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 _____

- 8. Provide contact person information for the agency you also filed the complaint with:
Name: _____ Address: _____
City: _____ State: _____ Zip Code: _____
Date Filed: _____

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

Complainant