**TITLE VI COMPLIANCE REVIEW**

**OF THE**

**Georgia Regional Transportation Authority**

**(GRTA)**

**Atlanta, GA**

**Final Report**

**July 2011**

**Prepared For**

**U.S. DEPARTMENT OF TRANSPORATION**

**FEDERAL TRANSIT ADMINISTRATION**

**OFFICE OF CIVIL RIGHTS**

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1. GENERAL INFORMATION

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Grantee No: 5891

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Site Visit Dates: February 22 – 24, 2011

Compliance Review

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1. JURISDICTION AND AUTHORITIES

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct civil rights compliance reviews. The Georgia Regional Transportation Authority (GRTA) is a recipient of FTA funding assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

* Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
* Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.).
* Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.).
* Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted).
* DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted).
* Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987).
* Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted).
* DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997).
* DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005).
* Section 12 of FTA’s Master Agreement, FTA MA (17) (October 1, 2010).
* FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines For Federal Transit Administration Recipients,” May 17, 2007.

1. PURPOSE AND OBJECTIVES

#### Purpose

The Federal Transit Administration (FTA) Office of Civil Rights periodically conducts discretionary reviews of grant recipients and subrecipients to determine whether they are honoring their commitments, as represented by certification, to comply with the requirements of 49 U.S.C. 5332. In keeping with its regulations and guidelines, FTA determined that a Compliance Review of the Georgia Regional Transportation Authority (GRTA) Title VI Program was necessary.

The Office of Civil Rights authorized the DMP Group to conduct the Title VI Compliance Review of GRTA. The primary purpose of this Compliance Review was to determine the extent to which GRTA has met its General Reporting and Program-Specific Requirements and Guidelines in accordance with FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients.” Members of the Compliance Review team also discussed with GRTA the requirements of the DOT Guidance on Special Language Services to Limited English Proficient (LEP) Beneficiaries that is referenced in Circular 4702.1A. The Compliance Review had a further purpose to provide technical assistance and to make recommendations regarding corrective actions, as deemed necessary and appropriate. The Compliance Review was not an investigation to determine the merit of any specific discrimination complaints filed against GRTA.

#### Objectives

The objectives of FTA’s Title VI Program, as set forth in FTA Circular 4702.1A, dated May 13, 2007, “Title VI and Title VI-Dependent Guidelines For Federal Transit Administration Recipients” are to:

* Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
* Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
* Promote the full and fair participation of all affected populations in transportation decision making;
* Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
* Ensure meaningful access to programs and activities by persons with limited English proficiency. The objectives of Executive Order 13166 and the “DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries” are for FTA grantees to take reasonable steps to ensure “meaningful” access to transit services and programs for limited English proficient (LEP) persons.

1. BACKGROUND INFORMATIOn

The Georgia Regional Transportation Authority (GRTA) was created in 1999 as a public corporation authorized by state legislation to plan, own, and operate public transit and to receive grants directly from Federal sources. It is governed by a 15-member Board of Directors that are all appointed by the Governor of Georgia. GRTA was created to manage, or cause to be managed, transportation and air quality within 13 counties in the metropolitan Atlanta region that had been designated by the U.S. Environmental Protection Agency as being non-attainment areas in terms of Federal air quality standards. The 2000 population of the 13-county region was 3,607,416.

GRTA began receiving FTA funding in 2001. GRTA uses FTA Sections 5307 and 5309 funds for planning, purchasing capital items, preventive maintenance, and the capital costs of contracting. GRTA is responsible for the Xpress commuter bus service in 12 of the 13 non-attainment Counties and this service has been operating since June 1, 2004. Xpress operates from 26 park and ride lots throughout the region. GRTA operates the commuter bus service through a management contract with Professional Transit Management (PTM) (20 routes), an inter-local agreement with Cobb County (five routes), an inter-local agreement with Gwinnett County (three routes), and service contracts with Veolia Transportation (one route) and American Coach (two routes).

GRTA operates the 31 Xpress routes with 155 buses. One hundred seventeen of the buses are FTA-funded and 38 buses have been funded with Georgia General Obligation Bond Funds. All but one of the Xpress routes operates out of park and ride lots. Service hours are generally 5:30 a.m. to 8:00 p.m. on weekdays, with no bus service on weekends. For the Xpress commuter service, the base fare is $3.00, except for a $4.00 fare charged for routes that operate more than 25 miles. During the mid-day period, very few routes operate, but they all offer a reduced mid-day fare of $1.50 for the elderly, persons with disabilities, and Medicare card holders.

GRTA’s FTA-funded assets include numerous vehicles, the South Operations Center in Forest Park, and Xpress park and ride lots at Powder Springs, Sigman Road, Jonesboro, Town Center, and Douglas Boulevard. Three new lots are currently under construction with FTA funds at I-985 and GA 20, Hamilton Mill, and Newnan.

In 2002, GRTA began passing through FTA funding for a free bus shuttle service in the Buckhead area of Atlanta (the “Buc”). This bus shuttle is provided by the Buckhead Community Improvement District (BCID) and connects two MARTA rail stations with numerous hotels, office buildings, shopping centers, and other activity centers in Buckhead. BCID operates the “Buc” through a turnkey contract with a private contractor that provides locally-funded vehicles for the service. GRTA provides Section 5307 funds to the BCID for the operation of the “Buc.”

GRTA contracts with VPSI, Inc. and Enterprise to provide regional vanpool program services utilizing FTA Section 5307 funds through the capital cost of contracting. VPSI and Enterprise lease approximately 300 vans to vanpools in the region.

GRTA Xpress service does not require complementary ADA paratransit service because it is designated as a commuter service.

A demographic profile of the GRTA service area from the 2000 Census, shows the racial, ethnic, low-income, and LEP populations in each of the 12 counties served by GRTA. The last table provides a summary for the total service area and showed 60.4 percent of the population was White non-Hispanic, 30.8 percent was Black, 7.1 percent was Hispanic, and 3.6 percent was Asian. The 2000 Census also showed that 9.2 percent of the population in the region was low-income and 11.3 percent was LEP.

**Racial/ Ethnic Breakdown of the**

**Georgia Regional Transportation Authority Counties Served**

Source: 2000 U.S. Census

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Racial/ Ethnic Group** | Cherokee County | | Clayton County | | Cobb County | | Coweta County | |
| **Num.** | **%** | **Num.** | **%** | **Num.** | **%** | **Num.** | **%** |
| White | 131,128 | 92.4 | 89,741 | 37.9 | 439,991 | 72.4 | 70,353 | 78.9 |
| Black | 3,525 | 2.5 | 121,927 | 51.6 | 114,233 | 18.8 | 16,032 | 18.0 |
| American Indian and Alaska Native | 534 | 0.4 | 751 | 0.3 | 1,579 | 0.3 | 208 | 0.2 |
| Asian | 1,141 | 0.8 | 10,629 | 4.5 | 18,587 | 3.1 | 610 | 0.7 |
| Hawaiian/Pacific Islander | 42 | 0.0 | 155 | 0.1 | 257 | 0.0 | 13 | 0.0 |
| Other Race | 3,702 | 2.6 | 8,392 | 3.5 | 21,731 | 3.6 | 1,089 | 1.2 |
| Two or More | 1,831 | 1.3 | 4,922 | 2.1 | 11,373 | 1.9 | 910 | 1.0 |
| Hispanic Origin[[1]](#footnote-1) | 7,695 | 5.4 | 17,728 | 7.5 | 46,964 | 7.7 | 2,797 | 3.1 |
| Total Population | **141,903** | **100%** | **236,517** | **100%** | **607,75** | **100%** | **89,215** | **100%** |
|  |  |  |  |  |  |  |  |  |
| Low Income | **7,474** | **5.3** | **23,493** | **10.1** | **38,910** | **6.5** | **6,888** | **7.8** |
| Limited English Proficient | **8,273** | **5.8** | **25,889** | **10.9** | **70,439** | **11.6** | **3,257** | **3.7** |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Racial/ Ethnic Group** | Dekalb County | | Douglas County | | Forsyth County | | Fulton County | |
| **Num.** | **%** | **Num.** | **%** | **Num.** | **%** | **Num.** | **%** |
| White | 238,521 | 35.8 | 71,235 | 77.3 | 93,531 | 95.0 | 392,598 | 48.1 |
| Black | 361,111 | 54.2 | 17,065 | 18.5 | 684 | 0.7 | 363,656 | 44.6 |
| American Indian and Alaska Native | 1,548 | 0.2 | 324 | 0.4 | 247 | 0.3 | 1,514 | 0.2 |
| Asian | 26,718 | 4.0 | 1,080 | 1.2 | 785 | 0.8 | 24,823 | 3.0 |
| Hawaiian/Pacific Islander | 329 | 0.0 | 21 | 0.0 | 13 | 0.0 | 346 | 0.0 |
| Other Race | 23,517 | 3.5 | 1,122 | 1.2 | 2,236 | 2.3 | 21,216 | 2.6 |
| Two or More | 14,121 | 2.1 | 1,327 | 1.4 | 911 | 0.9 | 11,853 | 1.5 |
| Hispanic Origin[[2]](#footnote-2) | 53,542 | 7.9 | 2,640 | 2.9 | 5,477 | 5.6 | 48,056 | 5.9 |
| Total Population | **665,865** | **100%** | **92,174** | **100%** | **98,407** | **100%** | **816,006** | **100%** |
|  |  |  |  |  |  |  |  |  |
| Low Income | 70,484 | 10.8 | 7,080 | 7.8 | 5,382 | 5.5 | 124,241 | 15.7 |
| Limited English Proficient | 101,320 | 15.2 | 3,550 | 3.9 | 5,883 | 6.0 | 78,619 | 9.6 |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Racial/ Ethnic Group** | Gwinnett County | | Henry County | | Paulding County | | Rockdale County | |
| **Num.** | **%** | **Num.** | **%** | **Num.** | **%** | **Num.** | **%** |
| White | 427,883 | 72.7 | 97,116 | 81.4 | 73,992 | 90.6 | 53,100 | 75.7 |
| Black | 78,224 | 13.3 | 17,523 | 14.7 | 5,685 | 7.0 | 12,771 | 18.2 |
| American Indian and Alaska Native | 1,638 | 0.3 | 269 | 0.2 | 241 | 0.3 | 181 | 0.3 |
| Asian | 42,360 | 7.2 | 2,096 | 1.8 | 327 | 0.4 | 1,340 | 1.9 |
| Hawaiian/Pacific Islander | 263 | 0.0 | 46 | 0.0 | 23 | 0.0 | 57 | 0.1 |
| Other Race | 25,407 | 4.3 | 945 | 0.8 | 463 | 0.6 | 1,776 | 2.5 |
| Two or More | 12,673 | 2.2 | 1,346 | 1.1 | 947 | 1.2 | 886 | 1.3 |
| Hispanic Origin2 | 64,137 | 10.9 | 2,692 | 2.3 | 1,398 | 1.7 | 4,182 | 6.0 |
| Total Population | **588,484** | **100%** | **119,341** | **100%** | **81,678** | **100%** | **70,111** | **100%** |
|  |  |  |  |  |  |  |  |  |
| Low Income | 33,067 | 5.7 | 5,821 | 4.9 | 4,454 | 5.5 | 5,673 | 8.2 |
| Limited English Proficient | 99,518 | 16.9 | 4,045 | 3.4 | 1,715 | 2.1 | 5,361 | 7.2 |

|  |  |  |  |
| --- | --- | --- | --- |
| **Racial/ Ethnic Group** | Total | | |
| **Num.** | **%** |
| White | 2,179,189 | 60.4 | |
| Black | 1,112,436 | 30.8 | |
| American Indian and Alaska Native | 9,034 | 0.3 | |
| Asian | 130,496 | 3.6 | |
| Hawaiian/Pacific Islander | 1,565 | 0.0 | |
| Other Race | 111,596 | 3.1 | |
| Two or More | 63,100 | 1.7 | |
| Hispanic Origin[[3]](#footnote-3) | 256,308 | 7.1 | |
| Total Population | **3,607,416** | **100%** | |
|  |  |  | |
| Low Income | 332,967 | 9.2 | |
| Limited English Proficient | 407,869 | 11.3 | |

**Racial/ Ethnic Breakdown of the**

**Georgia Regional Transportation Authority Total Service Area**

Source: 2000 U.S. Census

1. SCOPE AND METHODOLOGY

#### Scope

The Title VI Compliance Review of GRTA examined the following requirements and guidelines as specified in FTA Circular 4702.1A:

1. General Reporting Requirements and Guidelines – All applicants, recipients, and subrecipients shall maintain and submit the following:
2. Annual Title VI Certification and Assurance;
3. Title VI Complaint Procedures;
4. Record of Title VI Investigations, Complaints, and Lawsuits;
5. Language Access to LEP Persons;
6. Notice to Beneficiaries of Protection under Title VI;
7. Submit Title VI Program;
8. Environmental Justice Analysis of Construction Projects; and
9. Inclusive Public Participation.
10. Program-Specific Requirements and Guidelines for Large Urbanized Areas – All applicants, recipients, and subrecipients that provide public mass transit service in areas with populations over 200,000 shall also submit the following:
11. Demographic Data;
12. Systemwide Service Standards and Policies;
13. Evaluation of Service and Fare Changes;
14. Monitoring Transit Service;

#### Methodology

Initial interviews were conducted with the FTA Headquarters Civil Rights staff and the FTA Region IV Civil Rights Officer to discuss specific Title VI issues and concerns regarding GRTA. Following these discussions, an agenda letter was sent to GRTA advising it of the site visit and indicating additional information that would be needed and issues that would be discussed. The Title VI Review team focused on the compliance areas that are contained in FTA Title VI Circular 4702.1A that became effective on May 13, 2007. These compliance areas are: (1) General Reporting Requirements and Guidelines; and (2) Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas.

The General Reporting Requirements and Guidelines now include implementation of the Environmental Justice (EJ) and Limited English Proficiency (LEP) Executive Orders.

GRTA was requested to provide the following documents in advance of the site visit:

* Description of GRTA’s service area, including general population and other demographic information using the most recent Census data.
* Current description of GRTA’s public transit service, including system maps, public timetables, transit service brochures, etc.
* Roster of current GRTA’s revenue fleet, to include acquisition date, fuel type, seating configurations, and other amenities.
* Description of transit amenities maintained by GRTA for its service area. Amenities include stations, shelters, benches, restrooms, telephones, passenger information systems, etc.
* GRTA Organization Chart.
* Any studies or surveys conducted by GRTA, its consultants or other interested parties (colleges or universities, community groups, etc.) regarding ridership, service levels and amenities, passenger satisfaction, passenger demographics or fare issues for its public transit service during the past three years.
* Summary of GRTA’s current efforts to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities.
* A copy of GRTA’s four factor analysis of the needs of persons with Limited English Proficiency.
* A copy of GRTA’s plan for providing language assistance for persons with Limited English Proficiency that is based on the USDOT LEP Guidance.
* GRTA’s procedures for investigating and tracking Title VI complaints and documentation that the procedures for filing complaints are available to members of the public upon request.
* A list of any investigations, lawsuits, or complaints naming GRTA that alleges discrimination on the basis of race, color, or national origin during the past three years. This list must include:
* the date the investigation, lawsuit, or complaint was filed;
* a summary of the allegation(s);
* the status of the investigation, lawsuit, or complaint; and
* actions taken by GRTA in response to the investigation, lawsuit, or complaint.
* Copy of GRTA’s Notice to Beneficiaries of Protection Under Title VI.
* Documentation of efforts made by GRTA to notify members of the public of the protections against discrimination afforded to them by Title VI.
* Copies of any environmental justice assessments conducted for construction projects during the past three years and, if needed, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities.
* GRTA’s most recent Title VI Update that was submitted to FTA.
* A copy of GRTA’s demographic analysis of its urban beneficiaries. This can include either demographic maps and charts prepared or a copy of any customer surveys conducted since the last Title VI submittal that contain demographic information on ridership, or GRTA’s locally developed demographic analysis of its customer’s travel patterns.
* Quantitative system-wide service standards and qualitative system-wide service policies adopted by GRTA to guard against discriminatory service design or operations decisions.
* Documentation of GRTA’s methodology for evaluating significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact (Note: per Circular 4702.1A Chapter V part 4, this requirement applies to “major service changes” only and GRTA should have established guidelines or thresholds for what it considers a “major” service change to be). If GRTA has made significant service changes or fare changes in the past three years or is currently planning such changes, provide documentation of GRTA’s Title VI evaluations of the service or fare changes.
* Documentation of periodic service monitoring activities undertaken by GRTA, during the past three years, to compare the level and quality of service provided to predominantly minority and low-income areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. If GRTA’s monitoring determined that prior decisions have resulted in disparate impacts, provide documentation of corrective actions taken to remedy the disparities.

GRTA assembled most of the documents prior to the site visit and provided them to the Compliance Review team for advance review. A detailed schedule for the three-day site visit was developed.

The site visit to GRTA occurred February 22-24, 2011. The individuals participating in the Review are listed in Section VIII of this Report. An Entrance Conference was conducted at the beginning of the Compliance Review with GRTA senior management staff, the FTA Region IV Civil Rights Officer, and the contractor Review team. The Review team showed the participants a video on Title VI during the Entrance Conference. Also, during the Entrance Conference, the Review team explained the goals of the Review and the needed cooperation of staff members. The detailed schedule for conducting the on-site visit was discussed.

Following the Entrance Conference, the Compliance Review team conducted a detailed examination of documents submitted in advance of the site visit and documents provided at the site visit by GRTA staff on behalf of the agency.

The Review team then met with various staff members from GRTA to discuss how GRTA incorporated the FTA Title VI requirements into its public transit system. During the site visit, the Review team conducted field visits to observe program benefits to minority, non-minority, low-income, and non-low income riders. At the end of the site visit, an Exit Conference was held with GRTA senior management staff, the FTA Region IV Civil Rights Officer, and the contractor Review team. At the Exit Conference, initial findings and corrective actions were discussed with GRTA.

**Field Visits**

With the assistance of GRTA staff, the Review team identified three park and ride lots (lots) in minority/low-income areas, one lot in a minority/non-low income area, three lots in non-minority/non-low income areas, and one lot in a non-minority/low-income area. During the site visit, the Review team toured each of these lots to observe ridership and amenities, including benches, pavilions, security cameras, call boxes, etc. The Review team was informed that there were three types of lots: Xpress, Leased, and Interagency. Xpress lots are those lots constructed by GRTA, Leased lots are those leased from churches and shopping centers, and Interagency lots are those managed and maintained by other agencies. GRTA had little to no influence on the design of Leased and Interagency lots. The Xpress lots had the most amenities, followed by the Leased lots, and then followed by the Interagency lots, which contained the fewest amenities. The following lot types and locations were visited:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Based on the 2000 U.S. Census | | | | Based on Survey Data | |
| Lot Type/Location | Minority area | Low-Income area | Non-Minority area | Non-Low Income area | Minority Route | Non-Minority Route |
| **Xpress Lot** |  |  |  |  |  |  |
| Panola Road | X | X |  |  | Routes 422, 423 & 428 |  |
| Stockbridge | X |  |  | X | Route 432 | Route 431 |
| Riverdale | X | X |  |  | Route 442 |  |
| Jonesboro | X | X |  |  | Route 441 | Route 440 |
| Sigman Road Expansion |  | X | X |  |  | Route 420 & 421 |
|  |  |  |  |  | | |
| **Leased Lot** |  |  |  |  |  |  |
| Church in the Now |  |  | X | X | Route 423 | Route 430 |
| Atlanta Motor Speedway |  |  | X | X |  | Route 440 |
|  |  |  |  |  | | |
| **Interagency Lot** |  |  |  |  |  |  |
| McDonough |  |  | X | X | Route 432 | Route 430 |

The Review team focused its review on the amenities at each location. As noted above, of the Xpress lots visited, Panola Road, Riverdale, and Jonesboro were minority/low-income lots. Each of these lots was fairly well maintained and had similar amenities, as follows:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Lot | Fare Pavilions | Shelters W/Lean Bars | Benches | Security Cameras | Digital Signage | Call Boxes | Trash Cans | Lighting |
| Panola Road | 1 | 4 | 4 | Yes | 8 | 3 | 4 | Yes |
| Riverdale | 1 | 2 | 2 | Yes | 4 | 5 | 4 | Yes |
| Jonesboro | 1 | 3 | 4 | Yes | 6 | 3 | 2 | Yes |

Of the remaining Xpress lots visited, Stockbridge was a minority/non-low income lot and the Sigman Road Expansion was a non-minority/low income lot. Both of these lots were fairly well maintained, however, construction on the Sigman Road Expansion lot was incomplete and all of the amenities were not functional yet. Specifically, the lot did not have the electrical infrastructure installed for the operation of security cameras, digital signs, or call boxes. Also, since this lot was designed with decentralized passenger boarding and alighting locations, there were four passenger shelters (two on either side of the lot) with route map displays, rather than a fare pavilion. The amenities in both lots were as follows:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Lot | Fare Pavilions | Shelters w/Lean Bars | Benches | Security Cameras | Digital Signage | Call Boxes | Trash Cans | Lighting |
| Stockbridge | 1 | 3 | 5 | Yes | 6 | 1 | 4 | Yes |
| Sigman Road Expansion | None | 4 | 2 | Planned | Planned | Planned | 4 | Yes |

GRTA utilized security guards at the Stockbridge and Jonesboro lots as these lots had a higher rate of incidents than the other lots. Also, since the Stockbridge lot frequently reached full capacity, GRTA provided overflow parking spaces at a nearby “BrandsMart” retail store.

The Review team visited three other non-minority/non-low income lots, two Leased lots, and one Interagency lot. These lots did not have as many amenities as the Xpress lots controlled by GRTA. The two Leased lots had the same amenities, one passenger shelter with transit information, a bench, and a garbage can (although the lot at the Atlanta Motor Speedway was not paved). The Interagency lot, McDonough, had only a passenger shelter.

The Review team concluded that, with respect to the Xpress lots, there was no disparity between the minority/low-income lots and the non-minority/non-low income lots.

1. FINDINGS AND RECOMMENDATIONS

The Title VI Compliance Review focused on GRTA's compliance with the General Reporting Requirements and Guidelines and the Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas. This section describes the requirements and guidance and the findings at the time of the Compliance Review site visit. In summary, deficiencies were identified in three of the 12 requirements of the Title VI Circular applicable to recipients serving large urbanized areas, as follows:

* *Notice to Beneficiaries of Protection Under Title VI*
* *System-wide Service Standards and System-wide Service Policies*
* *Evaluation of Fare and Service Changes*

In addition, GRTA was issued one Advisory Comment in the area of *Inclusive Public Participation*.

Prior to the issuance of the Draft Report, GRTA provided documentation to close out all of the deficiencies. In addition, GRTA provided documentation to address the Advisory Comment.

#### FINDINGS OF THE GENERAL REPORTING REQUIREMENTS AND GUIDELINES

1. Inclusive Public Participation

**Guidance:**  *FTA recipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency’s public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.*

**Finding:**  During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA guidance for Inclusive Public Participation. Prior to the site visit, GRTA submitted its *GRTA Policies and Procedures Manual – June 2010 GRTA Public Involvement Procedures (PPM/PIP)*, in which GRTA described its practice of creating public involvement plans specific to each GRTA project. By tailoring its public involvement plans on a project-by-project basis, GRTA attempted “to establish a framework for achieving mutual understanding of project issues to build consensus among all concerned stakeholders involved and impacted by the project.”

In its PPM/PIP, GRTA identified project stakeholders as federal, state, and local officials, residential and business owners, and neighborhood and community interest groups. GRTA engaged stakeholders through a combination of processes, methods, and techniques incorporated in its project public involvement plans. GRTA’s public participation process, methods, and techniques included:

* Education Outreach – general newsletters, project specific newsletters, fact sheets, website, transportation publications (i.e., APTA, ASHTO, Mass Transit), editorials (i.e., AJC, Business Chronicle, Atlanta Tribune), and multilingual publications.
* Formal and Informal meetings – public hearings (formal), public information meetings (informal), community/civic/neighborhood association meetings, speakers bureau, charities and focus groups, stakeholders meetings, business coalition meetings, and transportation related fairs/events.
* Legislative Briefings – one-on-one meetings with locally elected officials.
* Chamber of Commerce/Business Organization Partnership – membership with active participation, special events and community affairs, speaking engagements, and ongoing dialogue.
* Website – “project specific” web links, web casting, email announcements/Internet message boards (list serve), and multi-lingual website.
* Media Outreach Database – record of community organizations, minority organizations, neighborhood and civic organizations, and individuals who submit written and oral comments used by GRTA in its ongoing communication efforts.

During the site visit, GRTA provided documentation of its efforts to include minority and low-income persons in its planning process. GRTA documentation included the following:

* Public notices in minority newspapers (Georgia Asian Times, Mundo Hispanico)
* Meetings with minority and low-income individuals and community groups, including:
  + Atlanta Metropolitan Black Chamber of Commerce
  + Atlanta NAACP
  + Asian-American Resource Center
  + Asian-American Chamber of Commerce of Georgia, Inc.
  + Korean-USA Chamber of Commerce
  + Center for Black Women’s Wellness, Inc.
  + Center for Pan Asian Community Services
  + Georgia Hispanic Chamber of Commerce
  + Japanese Chamber of Commerce
  + Latin American Association
  + Give Center West
  + Gwinnett Coalition for Health and Human Services
  + Lawrenceville Cooperative Ministry
  + Lawrenceville Housing Authority
  + Norcross Cooperative Ministry
  + Norcross Housing Authority
  + Salvation Army
  + St. Vincent de Paul Society, Inc.
  + Veteran’s Administration Outpatient Clinic
  + Catholic Charities
  + Pegui Mariduena (Individual/consultant) – Hispanic community outreach
  + Hsiang J. (Ray) Wang – President, Chinese-American Association of Atlanta
* Project specific public comment feedback.

GRTA also provided an example of its outreach efforts associated with the *I-85 Congestion Reduction Demonstration (CRD) Project*. GRTA explained that, in meeting the project’s Environmental Justice requirements, it:

*Identified key locations to distribute flyers throughout the study corridor. Flyers were distributed to community facilities, Section Eight housing facilities and other locations. For the first series of meetings, over 60 community organizations (including low-income and minority groups) were contacted to see if they would be willing to post flyers in their building or if they would distribute information to their constituents. From this list, five groups were willing to post flyers.*

*For the second series of meetings and for the PHOH, these same five groups were contacted to post flyers. In addition, research and field work was used to identify and reach out to other low income communities. A list of Section 8 housing properties were identified in the study area. The study team visited these housing units, as well as surrounding apartments, to distribute flyers and additional information about the project and the upcoming meetings.*

After low attendance at initial meetings by the minority and low-income communities, GRTA worked with the Gwinnett Community Improvement District (GCID) to increase participation. GRTA, along with GCID, made the following additional efforts to increase participation from minority and low-income persons in the area affected by the I-85 CRD Project:

* Partnered with the First United Pentecostal Church of Buford
* Canvassed the area and spoke one-on-one with day laborers
* Passed out “windshield” flyers on cars parked in the affected area
* Continued outreach to Section 8 housing developments

While GRTA demonstrated it used several of the activities for inclusive public participation recommended in FTA Circular 4702.1A.IV.9, it did so only in association with projects already conceived either by GRTA or another partner agency (i.e., the Atlanta Regional Commission). GRTA did not sufficiently demonstrate that it continuously engaged in proactive outreach that promoted early and continuous participation in the planning process from minority and low-income individuals, as required by FTA Circular 4702.1A.IV.9. GRTA indicated that the one exception occurred during the development of its original service plan from 1999 - 2002. Documentation of GRTA’s inclusive public participation efforts at that time was not provided during the site visit.

During the site visit, GRTA was given an Advisory Comment to provide minority and low-income persons with early and continuous opportunities to participate in the planning process on an ongoing basis.

After the site visit, GRTA implemented the following Inclusive Public Participation Plan:

*GRTA will have ongoing participation in the ARC Social Equity Committee which will meet on a quarterly basis. This committee will be a platform for considering the needs of the traditionally underserved population (minority, low income, and LEP) in the Atlanta region for planning activities, transit operations, projects and initiatives. GRTA will also solicit input from the committee for improving our communications, methods of engagement and participation by those populations. The committee is composed of representatives from grassroots/community-based organizations, federal agencies, local and state government, environmental organizations, educational institutions and the faith community.*

*Existing and newly established relationships with this committee will be used continually during the Factor 3 LEP analysis to assess the importance of GRTA programs, projects, and Xpress Bus.*

*Listed below are some of the strategies and outreach methods GRTA will use to engage the low-income, minority and LEP populations in the planning process for comment and input. Outreach can include, but is not be limited to the following activities:*

* *Identify the low-income, minority and LEP populations relative to the transportation decision for which public participation is sought. Partner with community-based organizations so they may assist GRTA with conducting outreach to specific low-income, minority and LEP populations.*
* *In consultation with community-based organizations, GRTA will develop appropriate strategies to engage each population and identify appropriate outreach methods most effective for identified low income, minority and LEP population.*
* *Where appropriate, schedule and implement public meetings using locations, facilities and times that are convenient and accessible and culturally appropriate.*
* *Where appropriate, use surveys (verbal or written) at appropriate locations (on-system, off-system), using appropriate staff to lead, facilitate, translate or administer as appropriate.*
* *Create databases of community-based organizations and networks that have access to minority, low-income and LEP populations, and constantly refine and add additional elements.*
* *Provide multi-language invitation tools as needed. Make qualified interpreters available and outreach materials available in appropriate language.*
* *Prepare in advance of public meetings, news media announcements in which communications are tailored to the news media that serves the particular communities or populations.*

*All necessary activities will be documented as ongoing input into the planning process.*

Implementation of this plan will meet the full intention of FTA Circular 4702.1A.IV.9.

1. Language Access to LEP Persons

**Requirement:** *FTA recipients shall take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP).*

**Finding:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Language Access to LEP persons. Prior to the site visit, GRTA submitted its plan for providing language access to LEP persons in a document titled, “*Xpress Policy and Activities to Serve Customers and Interested Persons with Limited English Proficiency*. This document acknowledged a 2006 FTA Triennial Review Title VI deficiency, in which FTA required GRTA to conduct an assessment of the LEP population, identify any LEP programs that needed to be implemented, and to implement a LEP program. Specifically, the 2006 report recommended that:

*“Based upon this initial review of potential LEP individuals, it appears that more work should be done to address the needs of Spanish speaking population. Additionally, as a significant Asian population has been identified in the service area, work should be done to meet their needs as well. It is the recommendation of this report that all schedules for Xpress service should be made available in Spanish and Korean languages, as the Korean language appears to be the predominant area of need.”*

GRTA updated its LEP Program to include a four-factor assessment and Language Assistance Plan (LAP) in accordance with FTA Circular 4702.1A.IV.4 and DOT Policy Guidance, as explained in the following table:

| **Elements Required for LEP Assessment and Language Access Plan**  **(Per FTA C. 4702.1A, IV, 4. a. and DOT Policy Guidance)** | | |
| --- | --- | --- |
|  | **Included in GRTA’s**  **Plan** | **Notes/Comments** |
| **Part A – Four-Factor Assessment** | | |
| 1. Demography –The number or proportion of LEP persons eligible to be served or likely to be encountered | Yes | GRTA used Census 2000 data to identify households by the language primarily spoken throughout its service area. In particular, GRTA looked at the percentage of linguistically isolated households (all members of the household 14 years old and over have at least some difficulty with English).  GRTA also used American Community Survey (ACS) data to determine that approximately 15.5 percent of the residents of metropolitan Atlanta (age 5 or older) speak a language other than English at home. Of the 779,211 people reporting they speak languages other than English, 387,268 or 7.5 percent or respondents either spoke English less than “very well” or “not at all.”  GRTA also analyzed the Foreign Places of Birth from the 2000 Census for its service area. The top four foreign places of birth were Mexico, India, Vietnam, and Korea.  Finally, GRTA developed a map titled *Limited English Proficiency Concentrations*, which highlighted areas where a higher than average density of the households had limited English proficiency. |
| 1. Frequency of Contact - the frequency with which LEP individuals come in contact with the program and/or activities | Yes | Using the information from Factor 1, GRTA identified routes where contact with LEP persons was most likely. GRTA then developed and conducted a GRTA Xpress Customer Survey in 2008 and 2010. Both surveys asked the respondents about race and language spoken at home. Based on the results, GRTA was able to identify which routes had the most frequent contact with Hispanic and Asian-American riders.  GRTA also assessed the frequency with which staff and drivers had, or could possibly have, contact with LEP persons. This included documenting phone inquiries and verbally surveying drivers. The staff and drivers indicated that they have had rare contact with LEP persons.  GRTA indicated that it would incorporate more detailed language criteria in future surveys in order to better identify service areas and routes which may have a higher usage by LEP persons.  It was also recommended that GRTA use data from school districts and engage the community organizations that represent LEP populations to further identify the frequency with which LEP persons come into contact with its service. |
| 1. Importance - the nature and importance of the program, activity, or service to people's lives; | TBD | GRTA stated that, according to a 2008 Customer Survey, less than 7% of *Xpress* customers cannot drive or did not have a vehicle available. The “typical” Xpress customer tended to be not transit dependent. GRTA further implied that LEP persons throughout its service area were transit dependent. The assumption was that those who were more transit dependent were more likely to use other forms of transportation that perhaps operated with greater frequency and coverage. GRTA stated that, while LEP persons may not use Xpress for the same reasons as less transit dependent customers, knowledge of the Xpress service could be critical within the LEP population should Xpress coaches be deployed for emergency evacuation.  GRTA also provided a list of community organizations that focused on outreach to LEP individuals that were consulted. The following organizations were listed in GRTA’s LEP Plan: Chamblee Chinese Cultural Center, Latin American Association, LLC, Korean-American Chamber of Commerce, Mexican-American Business Chamber, Atlanta Vietnamese Association. |
| 1. Resources - the resources available and costs | Yes | GRTA had identified the resources necessary to provide language assistance to LEP persons in its service area, to include: Auto-translator functionality on its website, language line, translated system materials (route schedules, system maps, etc.), and limited advertising in local foreign newspapers. Moreover, GRTA continued to include the provision of these resources in its annual budget. |
| Part B - Develop Language Assistance Plan | | |
| 1. Identification of LEP Persons | Yes | GRTA will take the following actions:   * Review customer relations management online service reports. Survey operations supervisors and other customer service staff as to any direct or indirect contact with LEP individuals. * Review LEP procedures and survey bus operators, supervisors and managers. * Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings. * Set up sign-in tables at GRTA sponsored workshops that are managed by GRTA staff who will engage participants noting how many have limited English proficiency. * Record how often “I Speak” cards are used to communicate with LEP customers.   GRTA should also continually monitor changes in demography as new data becomes available (Census 2010) and incorporate any changes in its LAP. |
| 1. Language Assistance Measures | Yes | GRTA’s Language Assistance Measures are as follows:   * “I Speak Cards” * Web-based translation service for customer service staff * Translation link on GRTA website * Language line |
| 1. Training of Staff | Yes | GRTA will provide all Xpress staff with the LEP Plan and will train staff on LEP procedures. LEP information will also be part of the Xpress staff orientation process for new hires. Training topics include:   * Understanding Title VI and LEP responsibilities. * What language assistance services GRTA offers. * Use of LEP “I Speak Cards.” * How to access translation services via the GRTA website. * How to use the language line interpretation and translation services. * Documentation of language assistance requests. * How to handle a Title VI or LEP complaint. |
| 1. Provide Notice to LEP Persons | Yes | GRTA will provide notice to LEP persons in the following ways:   * GRTA includes the LEP Plan with its Title VI Policy and Complaints Procedures. * GRTA’s Notice of Rights Under Title VI to the public is posted in the GRTA office and in selected printed material and also refers to the LEP Plan’s availability. * Customer Service Specialists who meet with community groups monthly will provide information about the language assistance services available. * Any person, group, or agency can access the LEP Plan via the GRTA website. * Copies of the LEP Plan are provided upon request. * When holding meetings in areas largely populated by LEP persons, GRTA staff will provide the appropriate translated materials (meeting notices, fliers, advertisements, and agendas). |
| 1. Monitor and Update the LAP | Yes | At a minimum, GRTA will follow the Title VI Program update schedule for updating the LAP. However, updates could occur upon the availability of Census 2010 data. Monitoring efforts include:   * How many LEP persons were encountered? * Were their needs met? * What is the current LEP population in the GRTA service area? * Has there been a change in the types of languages where translation services are needed? * Is there still a need for continued language assistance for previously identified GRTA programs? Are there other programs that should be included? * Have GRTA available resources, such as technology, staff and financial costs changed? * Has GRTA fulfilled the goals of the LEP Plan? * Were any complaints received? |

1. Title VI Complaint Procedure

**Requirement:** *FTA recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request.*

**Finding:** During the site visit of the Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Title VI Complaint Procedures. Prior to the site visit, GRTA submitted its Title VI Complaint Procedures which the Review team confirmed was posted on the *Xpress* website. The GRTA complaint procedures complied with FTA Circular 4702.1A, IV.2, with one exception. In its complaint procedures, GRTA stated that “*Federal and State law requires complaints be filed within one-hundred-eighty (180) calendar days of the last alleged event.”* Since this requirement no longer existed, GRTA was requested to update its procedure to say, *“…complaints should be filed within one-hundred-eighty (180) calendar days of the last alleged event.”*

Prior to the conclusion of the site visit, GRTA updated its Title VI complaint procedures to comply with FTA Circular 4702.1A, IV.2. The Review team confirmed that the updated Title VI complaint procedures were posted on the GRTA website.

1. Record of Title VI Investigations, Complaints, and Lawsuits

**Requirement:** *FTA recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipients that allege discrimination on the basis of race, color, or national origin. This list shall include the date that the 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 recipient in response to the investigation, lawsuit, or complaint.*

**Finding:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Record of Title VI Investigations, Complaints, and Lawsuits. Prior to the site visit, GRTA submitted two Title VI complaints filed within the last three years and submitted the entire complaint file for each of these complaints. No summary log was submitted.

During the site visit, GRTA was requested to develop a Title VI complaint tracking log that included all the required elements per FTA Circular 4702.1A, IV.3. Prior to the conclusion of the site visit, GRTA provided a Title VI Complaint Log that complied with the Circular.

1. Notice to Beneficiaries of Protection Under Title VI

**Requirement:** *FTA recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients shall disseminate this information to the public through measures that can include but shall not be limited to a posting on its Web site.*

**Finding:** During this Title VI Compliance Review of GRTA, deficiencies were found regarding GRTA’s compliance with FTA requirements for Notice to Beneficiaries of Protection Under Title VI. Prior to the site visit, GRTA submitted its Notice that included two of the three elements required in FTA Circular 4702.1A, IV.5 as shown on the following table:

|  |  |
| --- | --- |
| **Elements Required in Title VI Notification**  **(Per FTA Circular 4702.1A Chapter IV Section 5.a)** | **Included in GRTA Policy?** |
| A statement that the agency operates programs without regard to race, color, and national origin | Yes |
| A description of the procedures that members of the public should follow in order to request additional information on the recipient’s nondiscrimination obligations | No |
| A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient. | Yes |

During the site visit, GRTA was made aware of the requirement to include the statement in its Notice that explained how an individual can “*…request additional information on the recipient’s nondiscrimination obligations*.”

Prior to the conclusion of the site visit, GRTA updated its Notice accordingly.

In addition, prior to the site visit, GRTA only disseminated its Notice on its website. GRTA was instructed to develop a plan to disseminate its Notice in other ways.

The Review team confirmed that GRTA posted its updated Notice on its website. Through Google Translate, GRTA can translate the Notice in four different languages, including Spanish. Following the site visit, GRTA submitted a memorandum describing its plan to post the updated Notice at park and ride lots and on system brochures and route schedules.

The deficiency in this area is now closed.

1. Annual Title VI Certification and Assurance

**Requirement:** *FTA**recipients shall submit its annual Title VI certification and assurance as part of its Annual Certifications and Assurances submission to FTA (in the FTA web based Transportation Electronic Award Management (TEAM) grants management system.*

**Findings:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Annual Title VI Certification and Assurance. The FTA Civil Rights Assurance is incorporated in the Annual Certifications and Assurances submitted annually to FTA through the Transportation Electronic Award and Management (TEAM) system. GRTA executed its FY 2011 Annual Certifications and Assurances in TEAM on February 15, 2011. GRTA checked as applicable, 01. Certifications and Assurances required of all applicants. This is the category where the nondiscrimination assurance is located.

1. Environmental Justice Analysis of Construction Projects

**Guidance:** *FTA**recipients should integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects. (Recipients are not required to conduct environmental justice analyses of projects where NEPA documentation is not required.). In preparing documentation for a categorical exclusion (CE), recipients can meet this requirement by completing and submitting FTA’s standard CE checklist, which includes a section on community disruption and environmental justice.*

**Findings:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA guidance for Environmental Justice (EJ) Analyses of Construction Projects. Prior to the site visit, GRTA submitted a list of park and ride lot construction projects and the NEPA and CE documentation associated with each as a part of its most recent Title VI Program submittal. This list included twenty park and ride lots. Those lots constructed prior to 2009 (ten lots) were listed as having Program Categorical Exclusions (PCE). During the site visit, GRTA explained that it followed the FHWA’s EJ requirements for those projects and that FHWA issued PCEs. GRTA was advised that the PCEs mentioned above did not comply with FTA’s EJ requirements. Specifically, PCEs did not require or include a section on community disruption and environmental justice accompanied by an analysis of the effects the project would have on minority and low-income communities using census data.

Those lots constructed in 2009 or later were identified as having completed CE checklists, as required by FTA Circular 4702.1A.IV.8.

During the site visit, GRTA was asked to provide EJ documentation for the following construction projects:

* Douglas Boulevard (Brightstar) Park and Ride
* GCT 5307/5340 I-985/GA 20 (Gwinnett) Park and Ride
* ARRA Bus1/Construct (Sigman Road Expansion) Park and Ride
* Hamilton Mill Road Park and Ride
* Jodeco Road Park and Ride

The CEs for Gwinnett, Hamilton Mill Road, and Jodeco each contained a section on community disruption and environmental justice, as required by FTA Circular 4702.1A. The CEs for the Brightstar and Sigman Road Expansion locations contained a section on community disruption and environmental justice, but did not contain a demographic analysis of the affected areas. Instead, the CEs for these locations referred to the projects’ “public controversy potential,” with instructions for GDOT (not GRTA) to contact the FHWA for “programmatic processing of the CE.” During the site visit, GRTA provided demographic analyses for the Brightstar and Sigman Road Expansion locations. The Review team instructed GRTA to include a demographic analysis for all future construction projects for which CEs are prepared and to reference FTA, not FHWA, for all FTA-funded construction projects.

Furthermore, if GRTA initiates construction projects that require an Environmental Assessment (EA) or Environmental Impact Statement (EIS) in the future, GRTA was instructed to include the six elements required for Environment Justice Analysis of Construction Projects in the current Circular, as follows:

* 1. *A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or a public involvement process).*
  2. *A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income population.*
  3. *A discussion of all positive effects that would affect the identified minority and low-income population, such as an improvement in transit service, mobility, or accessibility.*
  4. *A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project.*
  5. *A discussion of the remaining effects, if any, and why further mitigation is not proposed.*
  6. *For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. Recipients and subrecipients that determine there is no basis for such a comparison should describe why that is so.*

1. Submit Title VI Program.

**Requirement:** *FTA recipients serving large urbanized areas are required to document their compliance with the general reporting requirements by submitting a Title VI Program to FTA’s Regional Civil Rights Officer once every three years.*

**Findings:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements to Submit Title VI Program. Prior to the site visit, GRTA submitted its *Title VI Program*, originally submitted on May 8, 2009. The following table summarizes GRTA’s Title VI Program submittal with respect to the current FTA Circular 4702.1A, IV.7:

| **ELEMENTS REQUIRED FOR TITLE VI PROGRAM** | |
| --- | --- |
| **GENERAL REQUIREMENTS**  **(Per FTA C. 4702.1A, IV, 7. a. (1) – (5))** | **In GRTA’s Title VI Program Submittal?** |
| * A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities. | No |
| * A copy of the agency’s plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency’s alternative framework for providing language assistance. | Yes |
| * A copy of the agency procedures for tracking and investigating Title VI complaints. | Yes |
| * A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part. | Yes |
| * A copy of the agency’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint. | Yes |
| **Program-specific requirements**  **(Per FTA C. 4702.1A, V, 6. a. (1) – (4))** |  |
| * A copy of the agency’s demographic analysis of its beneficiaries. This should include either any demographic maps and charts prepared or a copy of any customer surveys conducted since the last report that contain demographic information on ridership, or the agency’s locally developed demographic analysis of its customer’s travel patterns. | Yes |
| * Copies of system-wide service standards and system-wide service policies adopted by the agency since the last submission. | Yes |
| * A copy of the equity evaluation of any significant service changes and fare changes implemented since the last report submission. | Yes |
| * A copy of the results of either the level of service monitoring, quality of service monitoring, demographic analysis of customer surveys, or locally developed monitoring procedures conducted since the last submission. | Yes |

During the site visit, GRTA provided a list of outreach efforts conducted in the last three years. This list included efforts to engage minority, low-income, and LEP populations in the planning of GRTA initiatives, including service brochure design/translation, fare increases, service changes, and rider survey development. GRTA also provided two examples of meeting notices placed in minority newspapers, CrossRoads News (African-American) and Mundo Hispanico (Hispanic).

**PROGRAM-SPECIFIC REQUIREMENTS AND GUIDELINES FOR RECIPIENTS SERVING LARGE URBANIZED AREAS**

1. Demographic Data

**Requirement:** *FTA recipients serving large urbanized areas shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.*

**Findings:** During this Title VI Compliance Review of GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Demographic Data. Using the options presented in FTA C. 4702.1A, V, 1.a., GRTA provided all of the required information in its Option A: Demographic and Service Profile Maps and Charts. This Option requires the following items:

|  |  |
| --- | --- |
| **Elements Required for Demographic Data**  **(Per FTA C. 4702.1A, V, 1. a.)** | **Included in GRTA’s**  **Title VI Submittals?** |
| A base map of the agency’s service area that includes each census tract or traffic analysis zone (TAZ), major streets, etc., fixed transit facilities and major activity centers. The map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years. | Yes |
| A demographic map that plots the above information and also shades those Census tracts or TAZ where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole. | Yes |
| A chart for each Census tract or TAZ that shows the actual numbers and percentages for each minority group within the zone or tract. | Yes |

In its most recent FTA Title VI Program submittal, dated May 8, 2009, GRTA included the following maps:

* GRTA Regional Activity Centers
* GRTA Census tracts
* GRTA Minority Concentrations
* GRTA Low-income Household Concentrations
* GRTA Service Area Transit Facilities, Routes, and Minority Concentrations
* GRTA Service Area Transit Facilities, Routes, and Minority and Low-income Concentrations

The maps contained major streets, GRTA fixed transit facilities, GRTA bus routes, census tracts, and shadings for the minority and low-income census block groups as required by FTA Circular 4702.1A.V.1. GRTA also included a chart for each Census tract or TAZ that shows the actual numbers and percentages for each minority group within the zone or tract.

The Review team suggested GRTA update its maps and chart with U.S. Census 2010 data for its next Title VI submission. In addition, GRTA should prepare maps that show concentrations of specific minority groups, particularly African-Americans, Hispanics, and Asians, throughout its service area.

1. Systemwide Service Standards and Policies

**Requirement:**  *FTA recipients serving large urbanized areas shall adopt quantitative system-wide service standards necessary to guard against discriminatory service design or operations decisions. Recipients serving large urbanized areas shall adopt system-wide service policies necessary to guard against discriminatory service design or operations decisions. Service standards differ from service policies in that they are not based necessarily on a quantitative threshold.*

**Findings:** During this Title VI Compliance Review of GRTA, deficiencies were found regarding GRTA’s compliance with FTA requirements for Systemwide Service Standards and Policies. GRTA did not have an adequate service policy for vehicle assignment. FTA Circular 4702.1A describes effective practices to fulfill the service standard requirements. FTA recommends that recipients set standards for the following indicators, giving public transit agencies latitude to set standards for different/or additional indicators at their discretion:

|  |  |
| --- | --- |
| Service Standards | Service Policies |
| * Vehicle Load | * Vehicle Assignment |
| * Distribution of Transit Amenities | * Transit Security |
| * Vehicle Headway |  |
| * Service Availability |  |
| * On-time Performance |  |

During the site visit, GRTA submitted its most recent service and productivity standards in a document titled *GRTA FY 2011 Xpress Service Standards,* as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Years of Operation | Year 1 | Year 2 | Year 3 | Year 4 and longer |
| Peak Direction Service | | | | |
| Desired Fare Box Recovery Ratio | 25% | 30% | 35% | 40% |
| Minimum Fare Box Recovery Ration | 10% | 15% | 20% | 25% |
| Desired Passengers per Trip | 15 | 25 | 35 | 42.8 |
| Midpoint Passengers per Trip | 10 | 15 | 25 | 28.5 |
| Minimum Passengers per Trip | 5 | 8 | 11 | 14.3 |
| Maximum Trip Load Factor | 1.0 | 1.0 | 1.0 | 1.0 |
| Reverse Commute and Off-Peak Service | | | | |
| Desired Fare Box Recovery Ratio | 12.5% | 15% | 17.5% | 20% |
| Minimum Fare Box Recovery Ratio | 5% | 7.5% | 10% | 15% |
| Desired Passengers per Trip | 7.5 | 12.5 | 17.5 | 21.5 |
| Minimum Passengers per Trip | 2.5 | 4 | 5.5 | 7.1 |
| Maximum Trip Load Factor | 1.0 | 1.0 | 1.0 | 1.0 |

In addition, GRTA established the following service standard for the distribution of transit amenities:

*GRTA’s facility standard is that new Xpress Stations shall have the same package of amenities with a fare pavilion, passenger pavilions, route and schedule displays, benches, digital message signs, emergency call boxes and security cameras. In cases where there is a high degree of public visibility the fare pavilion building and security systems may not be provided.*

While this established a minimum mix of transit amenities at each park and ride lot, GRTA was encouraged in the future, to establish more quantifiable standards by individual transit amenity to assure itself that the number of individual transit amenities at any given location was based on the standard and did not result in an unintentional disparate impact. Alternatively, GRTA might consider establishing a quantifiable standard that would be applied to the entire location and was based on some measure of average traffic, or perhaps, parking spaces. The “package” of transit amenities (including individual quantities) that a location would get could be based on how it measured against the standard. For example, locations with no more than 100 parking spaces would get four shelters and eight benches, while locations with no more than 200 parking spaces would get six shelters and 12 benches.

At the site visit, GRTA provided a vehicle assignment policy based on vehicle age, as follows:

*It is GRTA’s policy that Xpress vehicles at each operating location are to be rotated among routes so that no minority route in the Xpress system receives vehicles on average that are more than five years older than the system average for all Xpress routes. Minority routes will be classified as the routes that, according to the last rider census, have more than 15 percent more minority riders than the average number of minority riders on all Xpress routes.*

GRTA’s vehicle assignment policy could result in a preponderance of older vehicles placed on minority and low-income routes. According to the GRTA policy, if the average age of its fleet was seven years, the average age of vehicles place on minority and low-income routes could be 12 years, while the average age of vehicles placed on non-minority routes could be two years. The GRTA vehicle assignment policy could result in an unintentional disparate impact.

During the site visit, the Review team recommended GRTA change its vehicle assignment policy. After the site visit, GRTA changed its policy from five years to two years and provided confirmation that the updated policy was adopted by its Board of Directors on April 13th, 2011.

The deficiency in this area is now closed.

1. Evaluation of Service and Fare Changes

**Requirement:** *FTA recipients shall evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. Recipients should have established guidelines or thresholds for what it considers a “major” change.*

**Findings:** During this Title VI Compliance Review of GRTA, deficiencies were found regarding GRTA’s compliance with FTA requirements for Evaluation of Service and Fare Changes. GRTA did not have procedures in place for the evaluation of service changes and had not established an adequate definition for “major service change”. Prior to the site visit, GRTA submitted documentation confirming the conduct of a recent Title VI fare change analysis. In a document titled *Evaluation of Title VI Impacts Related to the October 2010 Proposed Xpress Fare Increase,* dated June 2010, GRTA described in detail its evaluation of a proposed October 2010 fare increase. GRTA clearly established the need for the fare increase, the proposed fare change by fare type, and a comparative analysis of the impacts of the fare increase on minority/low-income versus non-minority/non-low income persons. GRTA’s comparative analysis was based on results from its *May 2010 Biennial Customer Satisfaction Survey* and the *2010 Atlanta Regional Commission’s Regional Transit Travel Survey*.

Regarding the requirement to conduct a Title VI fare change evaluation, the Review team confirmed with GRTA that an evaluation must be conducted when a change is being contemplated for any form of fare media, including the cash fare, monthly passes, or any other form of pre-paid fare.

At the time of the site visit, GRTA did not have procedures in place for the evaluation of service changes and had not established an adequate definition for “major service change,” as required by FTA Circular 4702.1A.V.4. Regarding its definition of “major service change,” GRTA referenced a document titled *Georgia Regional Transportation Authority FY 2010 Service Standards Manual Service Standards for Xpress Transit* Operations, in which it established that:

*…the following service changes require a public hearing process followed by review and action by the Georgia Regional Transportation Authority’s Board of Directors:*

* *Establishment of a new bus route and the initial schedule and headway parameters for that route.*
* *Significant deviations in the geographical path traversed by any routes, which may impact 25% of the existing average daily ridership or could be considered outside the corridor of direct service.*
* *A substantial geographical alteration (one and one half mile radius or more) in the termini of any route.*
* *Elimination of a bus service not under the demonstration project status.*
* *Modification to or increase in fare charged to the public for transit services.*

In particular, the Review team noted that the second bullet above failed to clearly establish a quantifiable service change threshold that was easily measured. It was suggested that GRTA consider including a change in revenue hours or route miles as criteria for a “major service change.” GRTA acknowledged it needed to update its definition of “major service change” and indicated it would modify the language as a part of its newly developed service change evaluation procedures. The Review team provided technical assistance in the development of new GRTA procedures, referring GRTA to the Circular and providing periodic feedback. The following elements are required by FTA Circular 4702.1A.V.4 for the evaluation of service and fare changes:

| **ELEMENTS REQUIRED FOR EVALUATION OF SERVICE AND FARE CHANGES (PER FTA C. 4702.1A, V, 4.A.)** |
| --- |
| 1. ASSESS THE EFFECTS OF THE PROPOSED FARE OR SERVICE CHANGE ON MINORITY AND LOW-INCOME POPULATIONS. |
| *Route changes – produce maps of service changes overlaid on a demographic map of the service area* |
| *Span of service – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted* |
| *Fare changes – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted* |
| 1. ASSESS THE ALTERNATIVES AVAILABLE FOR PEOPLE AFFECTED BY THE FARE INCREASE OF MAJOR SERVICE CHANGE. |
| *Service changes – Analyze what, if any, modes of transit are available for people affected by the service expansion or reduction. Analysis should compare travel time and costs to the rider of the alternatives.* |
| *Fare changes – Analyze what, if any, alternative transit modes, fare payment types or fare payment media are available for people affected by the fare change. Analysis should compare fares paid under the change with fares that would be paid through available alternatives.* |
| 1. DESCRIBE ACTIONS THE AGENCY PROPOSES TO MINIMIZE, MITIGATE, OR OFFSET ANY ADVERSE EFFECTS OF CHANGES ON MINORITY AND LOW-INCOME POPULATIONS. |
| 1. DETERMINE ANY DISPROPORTIONATELY HIGH AND ADVERSE EFFECTS ON MINORITY AND LOW-INCOME RIDERS. IF ANY, DESCRIBE THAT ALTERNATIVES WOULD HAVE MORE SEVERE ADVERSE EFFECTS THAN THE PREFERRED ALTERNATIVE |

After the site visit, GRTA submitted the following procedures for the evaluation of service changes:

***Service Change Analysis for Title VI***

|  |  |
| --- | --- |
| **Parameter** | **Definition** |
| **Route Hours** | *Whenever there is a service increase or decrease of 25% or more in daily revenue hours by route* |
| **Route Elimination** | *Whenever a complete route is eliminated* |
| **New Route** | *Whenever there is the addition of a new route* |

*For circumstances where an entire route is eliminated, added, or there is a reduction or increase of more than 25 percent in the revenue hours for a GRTA Operated Xpress Route, GRTA will evaluate the Title VI impacts by using the most recent bi-annual rider survey to determine the impacts on minority and low income riders who might be affected by the service change. The analysis will include the following:*

1. *A demographic map*
2. *A description of the service change*
3. *Rationale for the service change*
4. *Analysis of the survey data which identifies the impacts on minority and low income riders*

*For populations adversely affected by the proposed service changes the analysis will also include the following:*

1. *Assessment of the alternatives available for those affected by the service change*
2. *Analysis of the alternative transit options, payment type or payment media options for populations affected by the proposed service change*
3. *Comparison of the Impacts of the proposed alternatives to the proposed service change*

*Pursuant to FTA Circular 4702.1A dated May 13, 2007, a disproportionately high and*

*adverse effect will be defined as an adverse effect that either “is predominantly borne” by minority or low income populations or “is appreciably more severe or greater in magnitude” than the adverse effect suffered by non-minority and/or non-low income populations.*

*Should the analysis indicate disproportionate impacts for the minority and low income populations on the proposed service fare or service change, GRTA will begin a public outreach process to obtain feedback on the effects of the proposed change. If the proposed service change or fare change is determined to have been disproportionately high and adverse, GRTA will develop proposed actions to minimize, mitigate, or offset any adverse effects of the proposed service change or fare change on minority and low income populations.*

*A major service change shall be subject to the following approval and public comment requirements:*

|  |  |  |
| --- | --- | --- |
| **Service Change** | **Approval Board Approval** | **Public Comment** |
| Major Decrease | X | X |
| Major Increase Service | X\* |  |
| Route Elimination | X | X |

*(\* Public hearing only if requested by Board or local jurisdiction(s) affected)*

GRTA documented that these new procedures were adopted by its Board of Directors on April 13, 2011.

The deficiency in this area is now closed.

1. Monitoring Transit Service

**Requirement:** FTA *recipients shall monitor the transit service provided throughout its service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. Monitoring shall be conducted at minimum once every three years. If recipient monitoring determines that prior decisions have resulted in disparate impacts, it shall take corrective action to remedy the disparities.*

**Findings:** During this Title VI Compliance Review of the GRTA, no deficiencies were found regarding GRTA’s compliance with FTA requirements for Monitoring Transit Service. Prior to the site visit, GRTA provided documentation confirming its conduct of Option C: Title VI Analysis of Customer Surveys monitoring. As a part of its general service monitoring procedures, GRTA also collected data that would easily allow it to conduct Option A: Level of Service monitoring as well. With respect to FTA Circular 4702.1A, GRTA conducted Title VI monitoring in accordance with the following table:

|  |  |
| --- | --- |
| **Elements Required for Monitoring – Option A: Level of Service Methodology**  **(Per FTA C. 4702.1A, V, 5. a.)** | **Conducted by GRTA?** |
| Select a sample of bus routes and fixed guideway routes that provide service to a demographic cross-section of the recipient’s population. A portion of the routes in the sample should be those routes that provide service to a predominantly minority and low-income areas. | Data available |
| Assess the performance of each route in the sample for each of the recipient’s service standards and policies. | Data available |
| Compare the transit service observed in the assessment to the established service policies and standards. | Data available |
| In cases in which observed service does not meet the stated service policy or standard, recipients should determine why the discrepancy exists and take corrective action to correct the discrepancy. | Data available |

|  |  |
| --- | --- |
| **Elements Required for Monitoring – Option C: Title VI Analysis of Customer Surveys (Per FTA C. 4702.1A, V, 5. a.)** |  |
| For their most recent passenger survey, recipients should compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets, and the responses of those who identified themselves as white and/or in middle and upper-income brackets. | Yes |
| To the extent that survey data is available, recipients should determine whether the different demographic groups report significant differences in the travel time, number of transfers, and overall cost of the trip or if different demographic groups gave significantly different responses when asked to rate the quality of service, such as their satisfaction with the system, willingness to recommend transit to others, and value for fare paid. | Yes |
| If the agency concludes that different demographic groups gave significantly different responses, it should take corrective action to address the disparities. | Yes |

As a part of its Title VI monitoring process, GRTA conducted the *GRTA Xpress Title VI Analysis 2010 Customer Survey*, an on-board survey distributed to customers that asked for basic information on race and income and for feedback in the form of customer opinions. The survey asked the following questions:

1. *What is your door to door travel time in minutes?*
2. *Please rate the Xpress service on the following service characteristics (on-time performance, distance to park and ride, driver courtesy, passenger courtesy, cost of service, directness of route, convenience of stops, availability of schedules, ease of understanding schedules, comfort, ride quality, safe operation of the bus, safety and security at park and ride, cleanliness inside and out, XpressGA.com website, helpfulness of customer service).*

Services characteristics that were rated 25 percent worse by any protected group versus the average of all groups required GRTA action. Across all race and income categories, Asians ranking of the distance to park and ride lots and availability of schedules exceeded this threshold. In response, GRTA installed new graphics at all park and ride lots.

GRTA also monitored on-time performance, comparing the performance of minority routes and non-minority routes to the system average of 87 percent. According to GRTA’s monitoring, on-time performance for minority routes and non-minority routes was 89 percent and 86.4 percent, respectively.

In addition, GRTA documented its monitoring of the distribution of transit amenities and vehicle assignment against its related standards. GRTA found no instances of disparate impact for either standard.

Finally, as a part of its general performance monitoring process, GRTA monitored all routes against the following three standards: Passengers per Trip, Load Factor, and Cost per Passenger. Routes performing below established standards were eligible for modification. GRTA also developed a very useful Microsoft Excel tool that allowed it to input different performance variables and service scenarios. Based on the input, the tool would calculate a result that GRTA could use for route change decision-making and planning purposes. The data and tool associated with GRTA’s general performance monitoring process could easily be used to conduct Option A: Level of Service monitoring, as described in FTA Circular 4702.1A.V.5a.

1. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

| **Title VI Requirements** | | **Site Review Finding** | **Description of Deficiencies** | **Corrective Action(s)** | **Response Days/Date** | | **Date Closed** | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **GENERAL REQUIREMENTS** | | | | | | | | |
| 1. Inclusive Public Participation | | ND |  |  |  | |  | |
| 1. LEP Language Assistance Plan | | ND |  |  |  | |  | |
| 1. Title VI Complaint Procedures | | ND |  |  |  | |  | |
| 1. List of Title VI Investigations, Complaints, and Lawsuits | | ND |  |  |  | |  | |
| 1. Notice to Beneficiaries of Protection Under Title VI | | D | Title VI public notification deficiencies | GRTA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights a revised Notice to Beneficiaries of Protection Under Title VI that includes all the elements required by FTA Circular 4702.1A IV.5. GRTA must submit a plan to disseminate its Notice to the public in ways other than on its website. | 90 Days | | April 22,  2011 | |
| 1. Annual Title VI Certification and Assurance | | ND |  |  |  | |  | |
| 1. Environmental Justice Analyses of Construction Projects | | ND |  |  |  | |  | |
| 1. Prepare and Submit a Title VI Program | | ND |  |  |  | |  | |
| **PROGRAM SPECIFIC REQUIREMENTS FOR LARGE URBANIZED AREAS** | | | | | | | | |
| 1. Demographic Data | ND | |  |  | |  | |  |
| 1. System-wide Service Standards and Policies | D | | Service standards and/or policies lacking | GRTA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights a revised vehicle assignment standard that is not subject to having a disparate impact on minority and low-income persons. | | 90 Days | | April 22,  2011 |
| 1. Evaluation of Fare and Service Changes | D | | Impact of fare and/or service changes not adequately examined | GRTA must submit to the FTA Equal Opportunity Specialist in the FTA Headquarters Office of Civil Rights a process to evaluate significant system-wide service changes. The process must include a threshold for what is considered a “major” change, as required by the Circular. GRTA must perform the Title VI evaluation on all planned service changes that meet the threshold. | | 90 Days | | April 22,  2011 |
| 1. Monitoring Transit Service | ND | |  |  | |  | |  |

ND = No Deficiencies; D = Deficiency; NA = Not Applicable; NR = Not Reviewed; AC = Advisory Comment

1. ATTENDEES

|  | **Title** | **Phone**  **Number** | **Email** |
| --- | --- | --- | --- |
| ***GRTA*** | | | |
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1. Per the 2000 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories. [↑](#footnote-ref-1)
2. Per the 2000 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories. [↑](#footnote-ref-2)
3. Per the 2000 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories. [↑](#footnote-ref-3)