

# **Title VI Limited English Proficiency Plan Update 2021**



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# MARTA 2019 Limited English Proficiency Plan

TABLE OF CONTENTS	PAGE
<b>I. Notice to Subrecipients</b>	<b>3</b>
<b>II. Introduction</b>	<b>4</b>
<b>III. Purpose</b>	<b>4</b>
<b>IV. Authority and Guidance</b>	<b>5</b>
<b>V. Title VI Policy Statement</b>	<b>5</b>
<b>VI. Executive Summary</b>	<b>6</b>
<b>VII. LEP Population Overview</b>	<b>8</b>
<b>VIII. Four Factor Analysis</b>	<b>9</b>
<b>IX. Language Access Plan</b>	<b>46</b>
<b>X. Staff Roles and Responsibilities</b>	<b>52</b>
<b>XI. Training Staff</b>	<b>54</b>
<b>XII. LEP Plan Distribution</b>	<b>55</b>
<b>XIII. Monitoring and Updating the LEP Services</b>	<b>56</b>
<b>XIV. Compliance and Reporting</b>	<b>56</b>
<b>XV. How Is A Discrimination Complaint Filed?</b>	<b>56</b>
<b>XVI. Conclusion</b>	<b>57</b>

*Notice to Subrecipients*

## **LIMITED ENGLISH PROFICIENCY PLAN**

All programs and operations of entities that receive assistance from the federal government including the Metropolitan Atlanta Rapid Transit Authority (MARTA) and its subrecipients must comply, to the fullest reasonable extent, with improving access to services for Limited English Proficiency (LEP) persons. Subrecipients must have in place, written policies on the provision and use of interpreter and translation services.

I acknowledge that a copy of the MARTA 2021 Limited English Proficiency Plan has been provided to the organization listed below and I, the undersigned, have read the contents and fully understand the LEP Plan obligations and responsibilities.

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Signature

Date

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Organization Name

## II. Introduction

The Metropolitan Atlanta Rapid Transit Authority (MARTA) is committed to assisting individuals, for whom English is not their primary language, understand and have access to MARTA programs, activities, or services. Language for many Limited English Proficiency (LEP) individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.

Most individuals living in the United States read, write, speak, and understand English. There are many individuals, however, for whom English is not their primary language. For instance, based on the 2019 American Community Survey 5-Year Estimates, 8.4% (or 25.6 million people) of the United States population, age 5 and older (or 304.9 Million people), speak English less than very well. Of those individuals, 63.5% speak Spanish, 7.2% speak Chinese (including Mandarin and Cantonese), 6.9% speak ‘Other Indo-European’ languages, 4.3% speak ‘Other Asian and Pacific Island’ languages, 3.4% speak Vietnamese, 3.1% speak ‘Russian, Polish or Other Slavic’ languages, 2.3% speak ‘French, Haitian or Cajun’, 2.1% speak ‘Other and unspecified’ languages, 2.2% speak Korean, 2.1% speak Tagalog, 1.7% speak Arabic, and 1.1% speak ‘German or other West Germanic’ languages.

Executive Order 13166 “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons with Limited English Proficiency” (see 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

## III. Purpose

MARTA, as a recipient of funding from the Federal Transit Administration (FTA), must assure that LEP persons have meaningful language assistance by reasonable means, when using MARTA services or services provided by MARTA federal-funding recipients. Funding assistance from FTA requires a plan for providing this meaningful access in accordance with Title VI of the Civil Rights Act of 1964 and implementing regulations.

The MARTA LEP plan presents the sources of authority for LEP plan requirements and instructions for determining if the threshold to show the need for languages assistance is present. The plan will provide guidelines for MARTA and its

subrecipients to meet these needs and define the role of the MARTA Title VI program in that process. Specifically, this plan will outline how to collect LEP information and how to analyze that information.

Finally, this plan contains recommendations and resource material to hone our future focus and acknowledges the work MARTA has already done in an attempt to serve the LEP population in the MARTA service area.

MARTA recognizes the importance of effective and accurate communication between its personnel, more specifically, front-line personnel and the LEP Population. Therefore, MARTA has developed a set of policies and procedures for LEP persons to access services and understand their rights. Ensuring maximum communication between MARTA personnel and all segments of the community, including LEP populations, serves the interest of all stakeholders.

#### **IV. Authority and Guidance**

Presidential Executive Order (EO) 13166: Improving Access to Services for Persons with Limited English Proficiency provides directives on how to implement the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations.

On December 14, 2005, the United States Department of Transportation (USDOT) published revised guidance for its recipients on the Implementation of Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency.

In addition, the FTA references the USDOT LEP guidance in its Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," which was published on October 1, 2012. Chapter III, Section 9 of this Circular, reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients, such as MARTA, develop an LEP Plan consistent with the provisions of USDOT LEP guidance.

#### **V. Title VI/LEP Policy Statement**

MARTA is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. Therefore, MARTA assures that no person shall, on the grounds of race, color, national origin, or language be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MARTA service, program, or activity. In addition, MARTA will take aggressive and proactive steps to provide meaningful access and services to persons for whom English is not their primary language or who has a limited ability to read, write, speak, or understand English; including those who speak English less than very well, not well, or not at all - LEP persons.

## VI. Executive Summary

In order to ensure meaningful access for LEP persons, the MARTA General Manager/CEO has authorized the Office of Diversity and Inclusion (D&I) to develop, implement, monitor, and enforce LEP programs. To this end, the office of D&I serves in an oversight and compliance capacity for MARTA to ensure LEP inclusion. Therefore, to assess LEP programming needs, the office of D&I monitors and provides the distribution of resources to provide oral and written language assistance and gather research data in relation to LEP populations.

### Highlights of LEP Programming:

- MARTA's Office of D&I has expanded its work initiatives with community groups including Asian-based community resource organizations.
- "How to Ride MARTA" information in English and four other languages: Spanish, Vietnamese, Korean, Japanese, and Russian. These are posted on the MARTA website and distributed to community-based organizations (CBOs) that serve low income, minority, and LEP populations upon request.
- MARTA Riders Guides are available in two languages: English and Spanish. The Guides can be found at MARTA offices, station kiosks, and can be downloaded from the MARTA website. Optional languages are available upon request.
- The use of Language Line Translation Services is available via telephone through the Customer Care Center and Police Services.
- MARTA system-wide bus announcements are made in English and Spanish.
- All MARTA bus timetables are produced in English and Spanish and are available on the MARTA website.
- MARTA places Spanish language signage in select MARTA stations, as appropriate, for specific events and to announce construction or other situations important to customer safety.
- Multi-language assistance option for MARTA callers.
- Call center bilingual operators are available.
- Service modifications are available in Spanish and other languages, such as Vietnamese, Korean, and Chinese upon request.
- Translators at community public meetings, as appropriate.
- Ride with Respect publications were created with Spanish in the back and

are also available in other languages upon request.

- Bus and rail safety guidelines are in English and Spanish in all rail stations
- Title VI/LEP Training was added to New Employee Training and Orientation
- Title VI/LEP Training was conducted for Directors, Customer Service Department
- Distributed “I-Speak” pocket guides to front line employees and police officers
- Increased participation and sponsorship of LEP activities and events
- MARTA bus schedules with narrative information in English and Spanish.
- Bus detour signs in Spanish, as appropriate.
- Google Translator: A website machine translator service which enables users to translate most (or all) vital materials into six languages (Spanish, Chinese, Japanese, Korean, French, and German).
- Translated materials at community public meetings, as appropriate.
- Announcements on buses, trains and Stations in English and Spanish.
- Direct access for LEP customers, who call MARTA’s Call Center, to be connected to a telephonic interpretation service with linguists who speak over 200 languages.

Key research findings in relation to the MARTA Service area revealed:

- The 2019 American Community Survey 1-year Estimates reflect that 1,091,880 of Georgia residents are foreign born. This makes up 10.3% of the state’s population. From 2010 to 2019, the foreign-born population increased by 15.7% in Georgia. The census reports that 13.5% of the state’s population speaks a language other than English at home and 5.1% of the population speaks English less than “very well”.
- The top spoken language other than English is Spanish, spoken by 807,522 persons or 7.6% of the total population of Georgia.
- The top spoken languages other than English in Georgia are Spanish, Vietnamese (64,718 persons), ‘French, Haitian, or Cajun’ (55,675 persons), Chinese (52,962 persons), and Korean (42,362 persons).
- Within the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), 293,928 persons or 13.9% of the population are foreign born.

- Within the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), 16.0% of the population speaks a language other than English at home. In addition, 5.5% of this population speaks English less than “very well”.
- Spanish is spoken by 143,631 persons in the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), or 6.8% of the population. The top spoken languages other than English are Spanish, Chinese (19,360 persons), ‘French, Haitian, or Cajun (16,584 persons), Vietnamese (14,217 persons), and Korean (9,584 persons). In addition, 117,121 persons, or 5.5% of population in the MARTA Service Area have limited English proficiency (LEP; speak English less than “Very Well”).
- The top spoken languages among the LEP population in the MARTA Service Area are Spanish (63,616 persons), Chinese (9,681 persons), Vietnamese (9,304 persons), Korean (4,970 persons), and ‘French, Haitian, or Cajun’ (4,249 persons).
- Less than 2% of all calls to MARTA’s Customer Care Center or visits to MARTA’s website involved the use of language assistance services.
- LEP customers who call the MARTA Service Customer Care Center have direct access to Spanish-speaking customer service representatives.

Therefore, MARTA has developed an implementation plan to maintain regulatory compliance and address the LEP populations in the service area, including the following strategic elements: identifying LEP individuals who need language assistance through a 4-Factor Analysis; providing language assistance measures; training staff; providing notice to LEP persons; and monitoring and updating future LEP plans.

## **VII. LEP Population Overview**

The diversity of the Atlanta metropolitan population continues to grow and change with Asian and Hispanic young adults. Census Bureau statistics show that in 2019, 5.1% of the population in Georgia identified themselves as someone who speaks English less than “very well”. It is critical that MARTA utilize innovative and proactive methods to engage people from different cultures, backgrounds, and businesses in the public involvement aspect of planning and project development and other program areas such as: service modifications, transit development, and other programs or services involving the public.

Providing access to LEP persons to MARTA programs, services, and activities through translation of publications and oral language assistance is essential to business development. MARTA is committed to making its services and programs available to all persons, including the LEP population, as part of its mission “to ensure equal access to transportation.” Based on this commitment, MARTA



makes designated publications (Ride Guide, Community Exchange, Public Hearing, closing of major routes etc.) available in languages other than English and provides interpretation services to persons who are not proficient in English.

### **Demographics**

Demographic data is collected through MARTA's Quality of Service (QOS) Survey and Census Bureau Data. MARTA demographic ridership and travel patterns are collected through the QOS Survey. Demographic information includes race, age, gender, education, and household income. The QOS Survey also collects information on rider characteristics such as transit dependency, number of years riding the system, frequency of usage, and trip purpose. MARTA used this information to develop demographic profiles comparing minority riders and non-minority riders on variables that included trip purpose, transit dependency, income, age, gender, education, and travel frequency. In addition, demographic information was collected on fare usage by fare type among minority and low-income patrons.

The survey consists of face-to-face interviews with randomly selected patrons on the rail and fixed-route bus system. Data is collected using:

- An I-Speak card
- Bilingual surveyors
- Surveys in English and Spanish

## **VIII. The Four-Factor Analysis**

In creating its LEP Plan, MARTA identified its service area and conducted a Four-Factor Analysis as outlined under USDOT guidelines. The Four-Factor Analysis assesses: the number of LEP people served or encountered; the frequency of contact from LEP individuals; the nature and importance of the contact being made by LEP persons; and the available resources to provide access for LEP persons.

### **Service Area**

MARTA operates almost exclusively in Fulton, DeKalb, and Clayton counties, with bus service to destinations in Cobb County (Six Flags over Georgia and the Cumberland Transfer Center next to the Cumberland Mall). The MARTA service population<sup>1</sup> for the three counties is about 2 million. The average total daily ridership for bus and rail for September 2021 was 151,561 passengers.

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<sup>1</sup> Includes Clayton, DeKalb & Fulton Counties.

**Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.**

In order to analyze the number and proportion of LEP persons served or encountered in the eligible service population, MARTA used a mixture of data sources, including the data from the U.S. Census and internal agency data to examine the agency’s experience with LEP individuals and then determine the number and proportion of LEP persons served or encountered within their service area.

According to the DOT guidance on LEP populations, “the greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.” Therefore, MARTA also collected data in relation to the languages spoken at home within the service area.

**Table 1: Languages Spoken at Home for the Population of 5 Years Old and Over (Source: US Census Bureau ACS 2015-2019 – Table C16001<sup>a</sup>)**

	FULTON COUNTY		DEKALB COUNTY		CLAYTON COUNTY	
	Population Estimate	Margin of Error (+/-)	Population Estimate	Margin of Error (+/-)	Population Estimate	Margin of Error (+/-)
<b>Total Population</b>	<b>974,271</b>	<b>74</b>	<b>696,356</b>	<b>92</b>	<b>261,911</b>	<b>36</b>
Speak only English	818,758	3,737	565,090	3,027	211,709	1,455
<b>Spanish</b>	<b>60,468</b>	<b>1,872</b>	<b>52,963</b>	<b>1,136</b>	<b>30,200</b>	<b>778</b>
- Speak English "very well"	37,179	1,790	26,476	1,345	16,360	786
- Speak English less than "very well"	23,289	1,520	26,487	1,218	13,840	872
<b>French, Haitian, or Cajun</b>	<b>7,342</b>	<b>1,372</b>	<b>6,610</b>	<b>1,284</b>	<b>2,632</b>	<b>779</b>
- Speak English "very well"	6,001	1,249	4,429	932	1,905	753
- Speak English less than "very well"	1,341	352	2,181	561	727	271
<b>German or other West Germanic languages</b>	<b>3,622</b>	<b>714</b>	<b>1,980</b>	<b>367</b>	<b>209</b>	<b>116</b>
- Speak English "very well"	3,249	713	1,903	369	160	95

- Speak English less than "very well"	373	135	77	45	49	47
<b>Russian, Polish, or other Slavic languages</b>	<b>5,410</b>	<b>1,024</b>	<b>2,375</b>	<b>502</b>	<b>29</b>	<b>34</b>
- Speak English "very well"	3,189	663	1,369	384	16	19
- Speak English less than "very well"	2,221	694	1,006	312	13	20
<b>Other Indo-European languages<sup>b</sup></b>	<b>25,982</b>	<b>1,753</b>	<b>16,352</b>	<b>1,690</b>	<b>597</b>	<b>293</b>
- Speak English "very well"	21,339	1,661	9,060	1,075	322	191
- Speak English less than "very well"	4,643	743	7,292	1,250	275	173
<b>Korean</b>	<b>6,085</b>	<b>906</b>	<b>3,225</b>	<b>476</b>	<b>274</b>	<b>134</b>
- Speak English "very well"	2,962	495	1,533	371	119	75
- Speak English less than "very well"	3,123	650	1,692	351	155	101
<b>Chinese (incl. Mandarin, Cantonese)</b>	<b>11,925</b>	<b>1,178</b>	<b>6,349</b>	<b>768</b>	<b>1,086</b>	<b>712</b>
- Speak English "very well"	6,130	701	3,281	554	268	162
- Speak English less than "very well"	5,795	857	3,068	600	818	652
<b>Vietnamese</b>	<b>1,829</b>	<b>511</b>	<b>4,513</b>	<b>895</b>	<b>7,875</b>	<b>724</b>
- Speak English "very well"	780	278	1,867	487	2,266	465
- Speak English less than "very well"	1,049	387	2,646	614	5,609	578
<b>Tagalog (incl. Filipino)</b>	<b>1,008</b>	<b>328</b>	<b>848</b>	<b>382</b>	<b>775</b>	<b>405</b>
- Speak English "very well"	706	276	590	248	540	292
- Speak English less than "very well"	302	137	258	262	235	274
<b>Other Asian and Pacific Island languages</b>	<b>16,575</b>	<b>1,579</b>	<b>9,600</b>	<b>1,071</b>	<b>2,353</b>	<b>472</b>
- Speak English "very well"	13,166	1,417	5,272	657	1,282	384
- Speak English less than "very well"	3,409	695	4,328	899	1,071	278

<b>Arabic</b>	<b>5,189</b>	<b>1,271</b>	<b>3,393</b>	<b>813</b>	<b>321</b>	<b>224</b>
- Speak English "very well"	3,543	913	1,657	391	247	180
- Speak English less than "very well"	1,646	602	1,736	639	74	76
<b>Other and unspecific languages</b>	<b>10,078</b>	<b>1,293</b>	<b>23,058</b>	<b>2,321</b>	<b>3,851</b>	<b>720</b>
- Speak English "very well"	8,420	1,153	13,293	1,577	2,986	621
- Speak English less than "very well"	1,658	503	9,765	1,502	865	416

<sup>a</sup> The table above displays the 2015-2019 ACS Table C16001, which is a collapsed language table. Since 2016, language categories in the American Community Survey (ACS) have been updated to reflect changes in the number of people speaking different languages where languages that have decreased in use are no longer displayed individually but instead included in an aggregated form.

<sup>b</sup> Other Indo-European languages include Greek, Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish, Persian, Farsi, Dari, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Konkani, Telugu, Tamil, Malayalam, Kannada, other Indic, and other Dravidian languages.

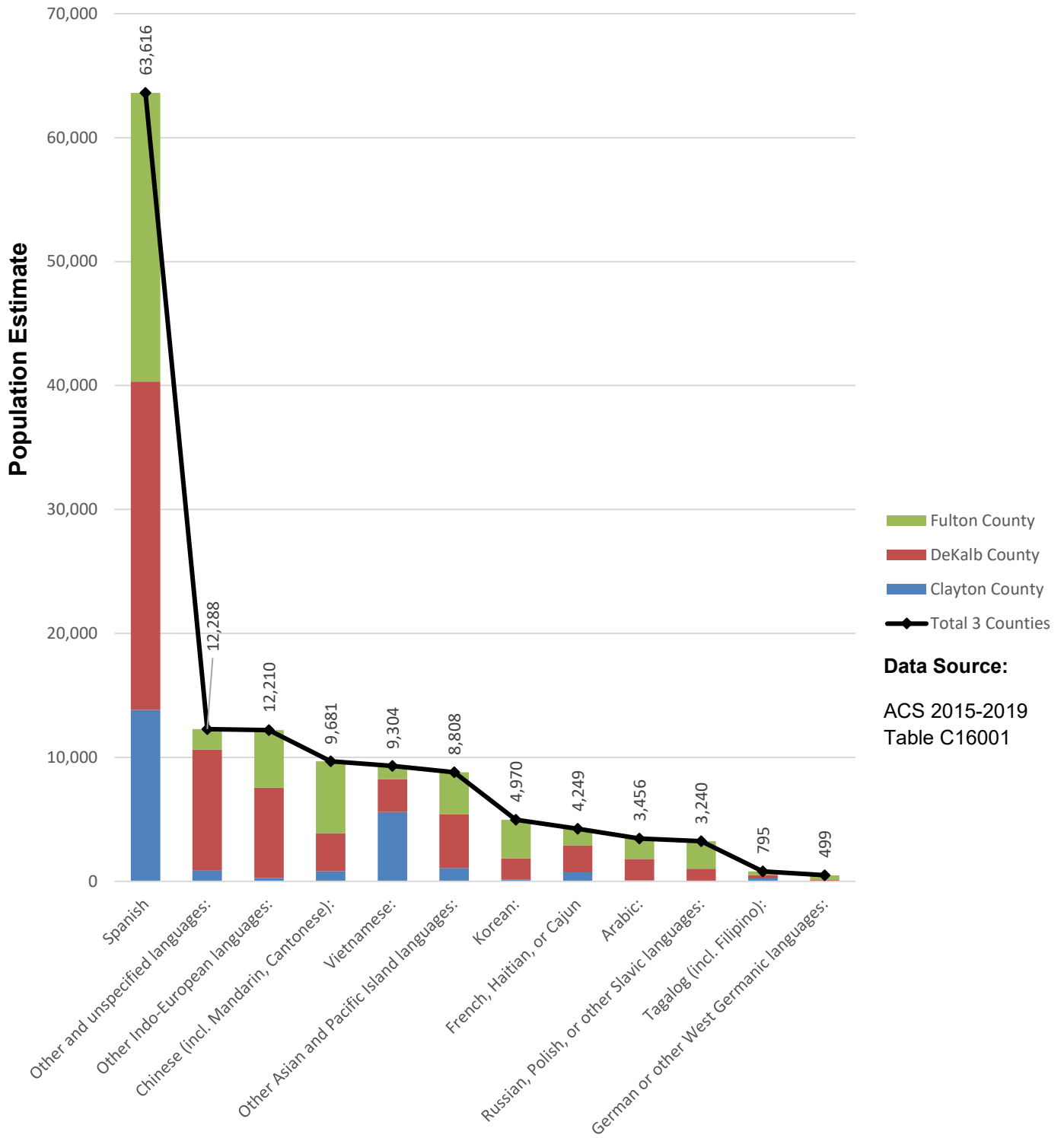
<sup>c</sup> Other Asian and Pacific languages include Japanese, Hmong, Khmer, Burmese, Karen, Turkish, Uzbek, Thai, Lao, Iloko (Ilocano), Samoan, Hawaiian, Cebuano (Bisayan), Indonesian, other Tai-Kadai, and other Austronesian languages.

**Table 2: Prevalence of languages spoken at home by the LEP population (ACS 2015-2019 – Table C16001).  
Languages are ranked for each county and for the entire 3-County MARTA service area.**

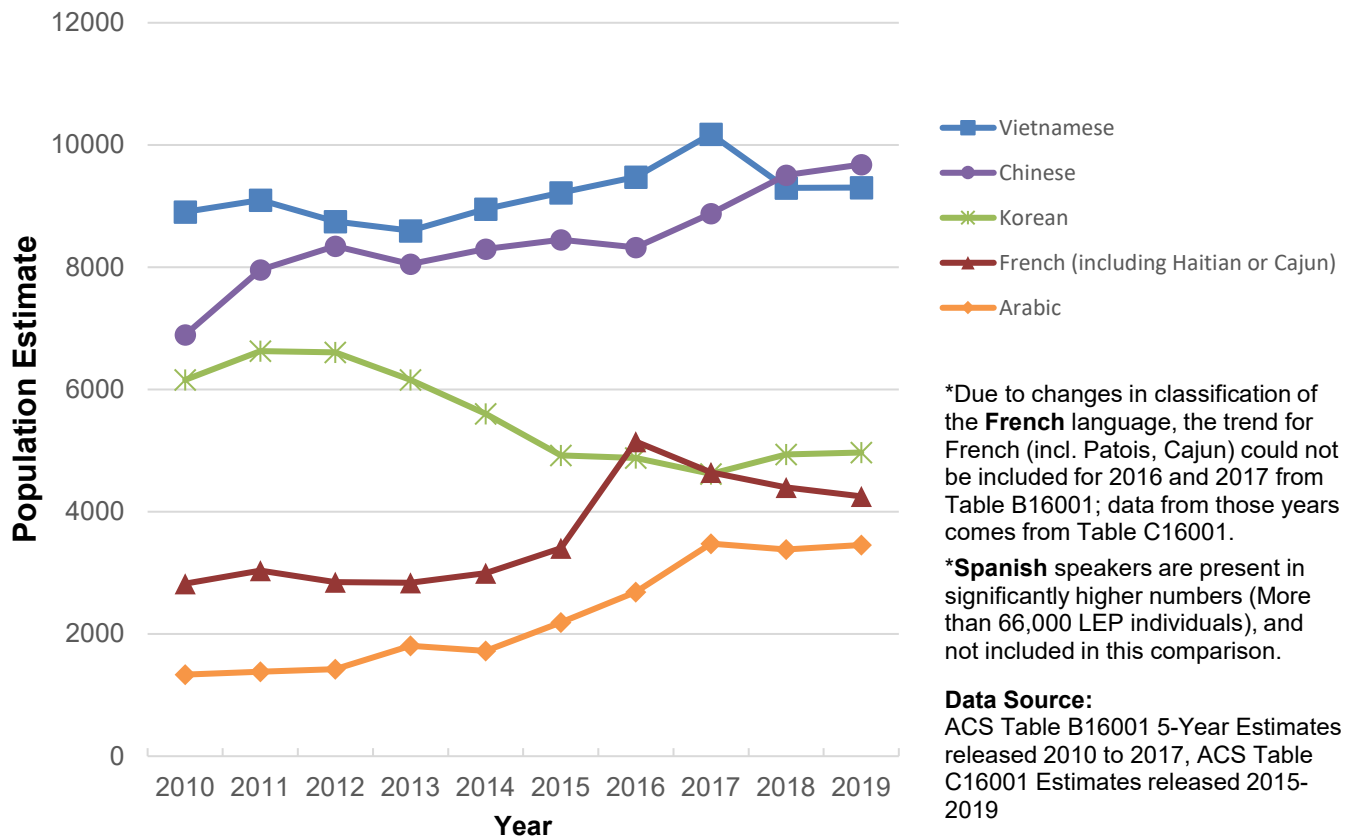
FULTON COUNTY		DEKALB COUNTY		CLAYTON COUNTY		3-COUNTY MARTA SERVICE AREA	
LANGUAGE	POPULATION	LANGUAGE	POPULATION	LANGUAGE	POPULATION	LANGUAGE	POPULATION
Spanish	23,289 (2.39%)	Spanish	26,487 (3.80%)	Spanish	13,840 (5.28%)	Spanish	63,616 (3.29%)
Chinese (incl. Mandarin, Cantonese):	5,795 (0.59%)	Other and unspecified languages:	9,765 (1.40%)	Vietnamese:	5,609 (2.14%)	Other and unspecified languages:	12,288 (0.64%)
Other Indo-European languages:	4,643 (0.48%)	Other Indo-European languages:	7,292 (1.05%)	Other Asian and Pacific Island languages:	1,071 (0.41%)	Other Indo-European languages:	12,210 (0.63%)
Other Asian and Pacific Island languages:	3,409 (0.35%)	Other Asian and Pacific Island languages:	4,328 (0.62%)	Other and unspecified languages:	865 (0.33%)	Chinese (incl. Mandarin, Cantonese):	9,681 (0.50%)
Korean:	3,123 (0.32%)	Chinese (incl. Mandarin, Cantonese):	3,068 (0.44%)	Chinese (incl. Mandarin, Cantonese):	818 (0.31%)	Vietnamese:	9,304 (0.48%)
Russian, Polish, or other Slavic languages:	2,221 (0.23%)	Vietnamese:	2,646 (0.38%)	French, Haitian, or Cajun	727 (0.28%)	Other Asian and Pacific Island languages:	8,808 (0.46%)
Other and unspecified languages:	1,658 (0.17%)	French, Haitian, or Cajun	2,181 (0.31%)	Other Indo-European languages:	275 (0.10%)	Korean:	4,970 (0.26%)
Arabic:	1,646 (0.17%)	Arabic:	1,736 (0.25%)	Tagalog (incl. Filipino):	235 (0.09%)	French, Haitian, or Cajun	4,249 (0.22%)

<b>French, Haitian, or Cajun</b>	1,341 (0.14%)	<b>Korean:</b>	1,692 (0.24%)	<b>Korean:</b>	155 (0.06%)	<b>Arabic:</b>	3,456 (0.18%)
<b>Vietnamese:</b>	1,049 (0.11%)	<b>Russian, Polish, or other Slavic languages:</b>	1,006 (0.14%)	<b>Arabic:</b>	74 (0.03%)	<b>Russian, Polish, or other Slavic languages:</b>	3,240 (0.17%)
<b>German or other West Germanic languages:</b>	373 (0.04%)	<b>Tagalog (incl. Filipino):</b>	258 (0.04%)	<b>German or other West Germanic languages:</b>	49 (0.02%)	<b>Tagalog (incl. Filipino):</b>	795 (0.04%)
<b>Tagalog (incl. Filipino):</b>	302 (0.03%)	<b>German or other West Germanic languages:</b>	77 (0.01%)	<b>Russian, Polish, or other Slavic languages:</b>	13 (0.005%)	<b>German or other West Germanic languages:</b>	499 (0.03%)

**Chart 1: Languages Spoken at Home by LEP Population in the MARTA Service Area**



**Chart 2: Growth of languages most commonly used by the LEP population in the MARTA Service Area**



*Data Analysis (and charts were updated)*

Table 2 details the estimated LEP population for each county. The Spanish-language is the most commonly spoken language at home in all three counties (23,289 persons in Fulton County; 26,487 persons in DeKalb County; 13,840 persons in Clayton County). Other than the Spanish-language, the two most commonly spoken languages at home are Vietnamese and Chinese for both DeKalb County (2,646 Vietnamese-language speakers; 3,068 Chinese-language speakers) and Clayton County (5,609 Vietnamese-language speakers, 818 Chinese-language speakers). For Fulton County, the two most commonly spoken languages at home besides Spanish are Chinese (5,795 persons) and Korean (3,123 persons). Within this LEP population, Vietnamese



speakers are relatively low in Fulton County – Only 1,049 persons or 0.11% of Fulton population. Korean speakers are relatively low in DeKalb County and Clayton County – 1,692 (0.24%) and 155 (0.06%) respectively.

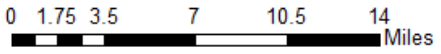
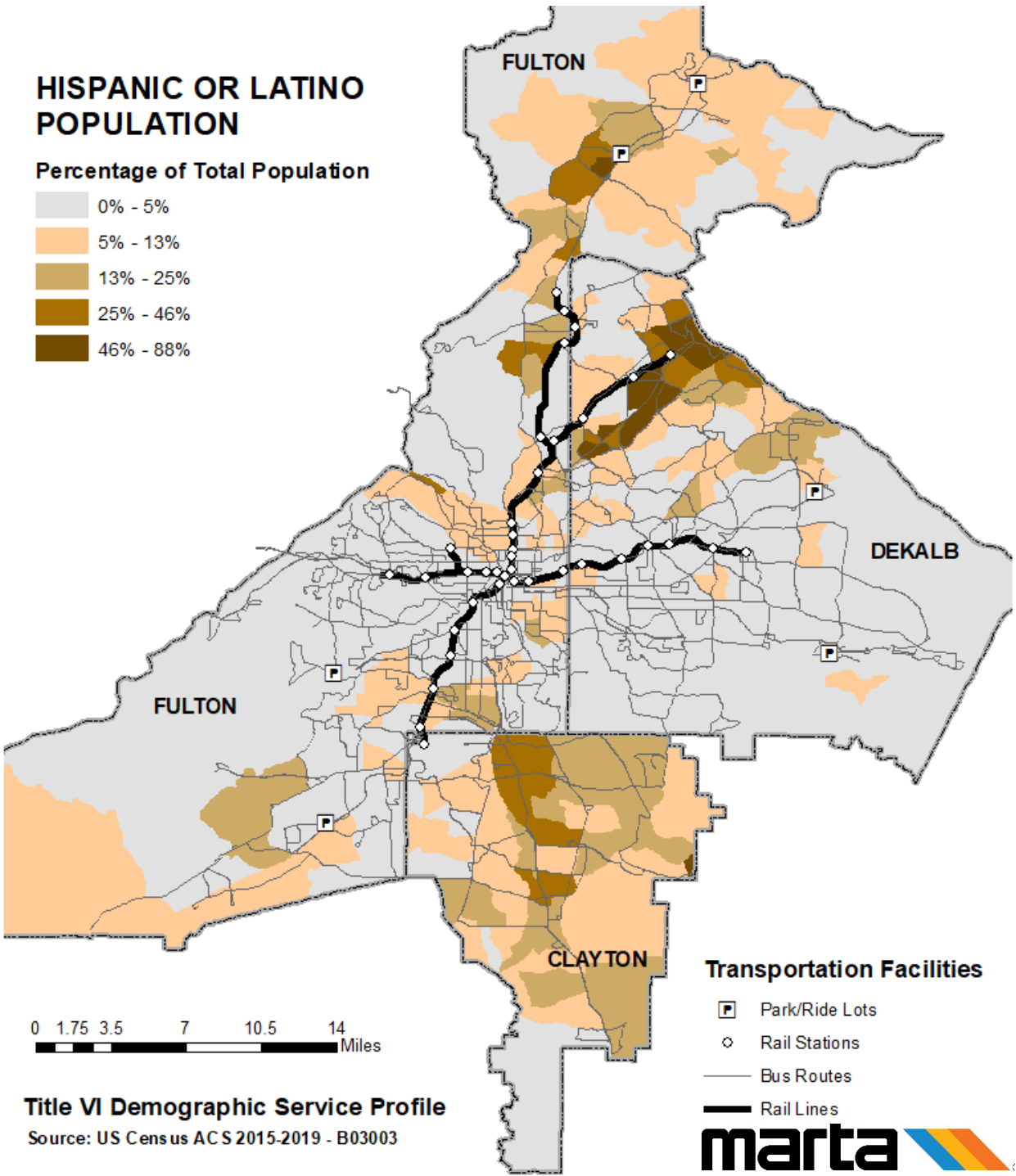
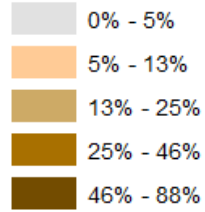
Charts 1 and 2 provide graphical comparison of languages spoken at home by the LEP population in the MARTA service area (Fulton, DeKalb and Clayton counties combined). Chart 1 ranks languages from left to right in order of greatest to lowest number of speakers. Individually-classified languages in the order of greatest to lowest number of speakers are Spanish (63,616 individuals, 3.29% of MARTA service area), Chinese (9,681 individuals, 0.50% of MARTA service area), Vietnamese (9,304 individuals, 0.48% of MARTA service area), Korean (4,970 individuals, 0.26% of MARTA service area), Arabic (3,456 individuals, 0.18% of MARTA service area), and Tagalog (795 individuals, 0.04% of MARTA service area). The aggregated language classifications ‘Other Indo-European languages’, ‘Other and unspecified languages’, and ‘Other Asian and Pacific Island languages’ are ranked somewhat highly but are comprised of a diverse range of distinct languages that are not sufficiently common to be classified individually.

Chart 2 illustrates the trend of LEP population growth over time. Comparison of LEP population from 2010 clearly shows declining numbers of Korean speakers and increasing numbers of French and Arabic speakers.

Taken together, the above findings suggest that MARTA should continue LEP programming in the Spanish language, and the common Asian languages (Vietnamese, Chinese and Korean). MARTA will additionally continue to monitor the growth of the French-speaking population and evaluate the need for inclusion of the French-language.

# HISPANIC OR LATINO POPULATION

## Percentage of Total Population



**Title VI Demographic Service Profile**  
 Source: US Census ACS 2015-2019 - B03003

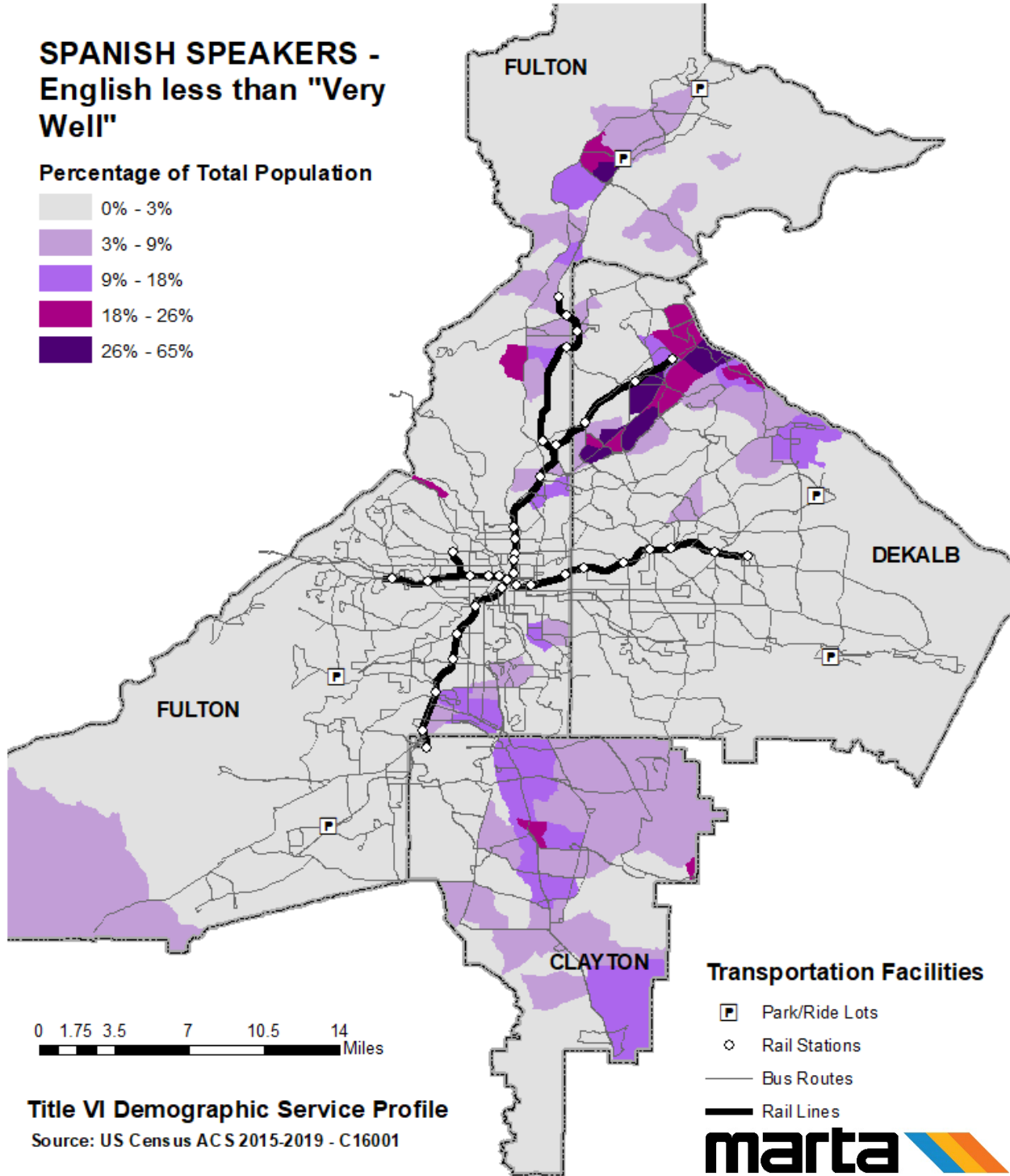
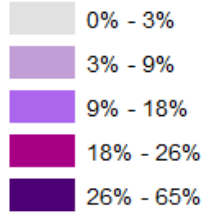
## Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines



# SPANISH SPEAKERS - English less than "Very Well"




## Percentage of Total Population



### Title VI Demographic Service Profile

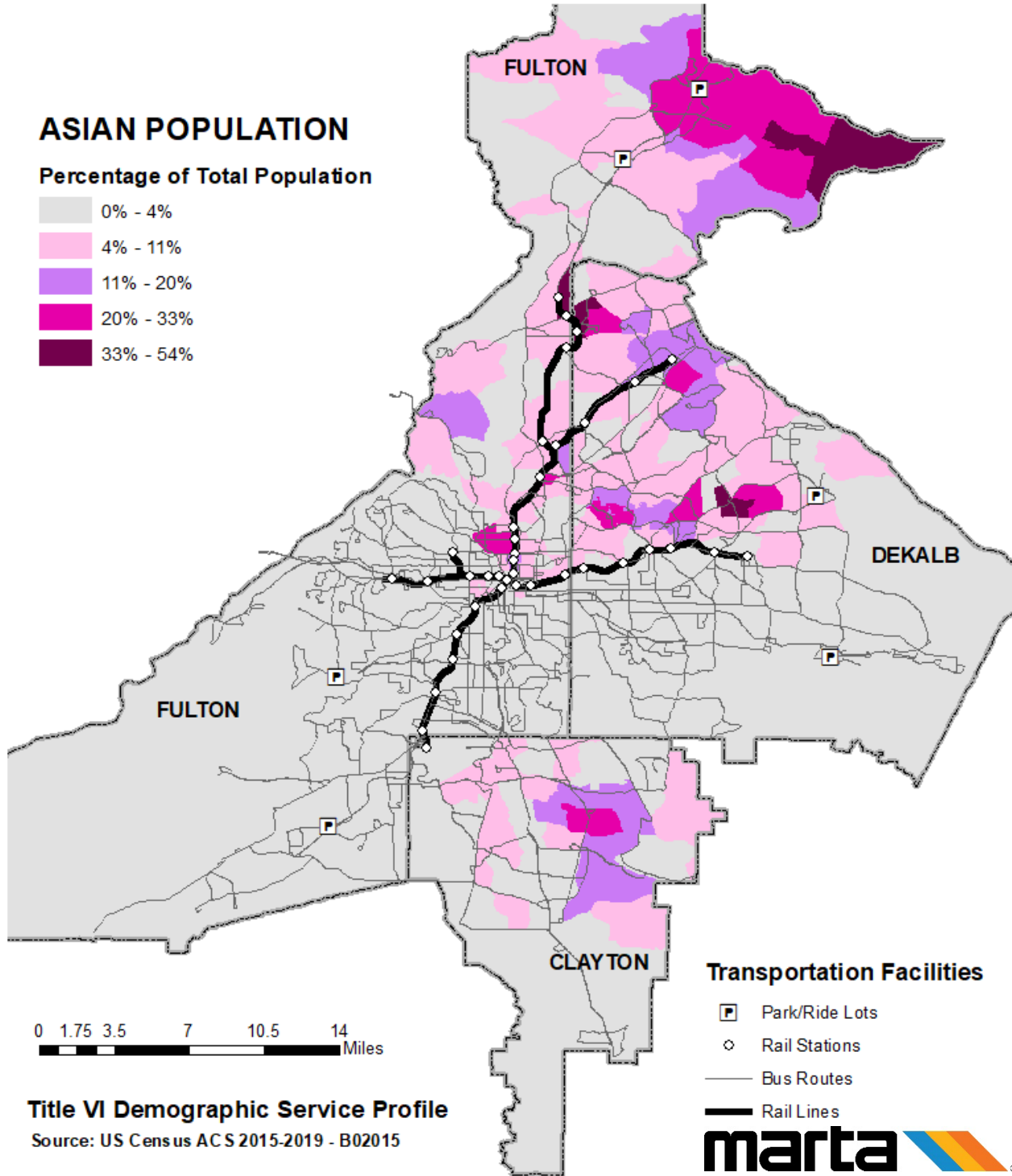
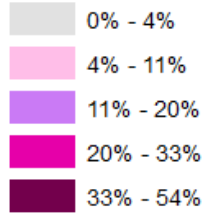
Source: US Census ACS 2015-2019 - C16001

### Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines

## ASIAN POPULATION




Percentage of Total Population



### Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - B02015

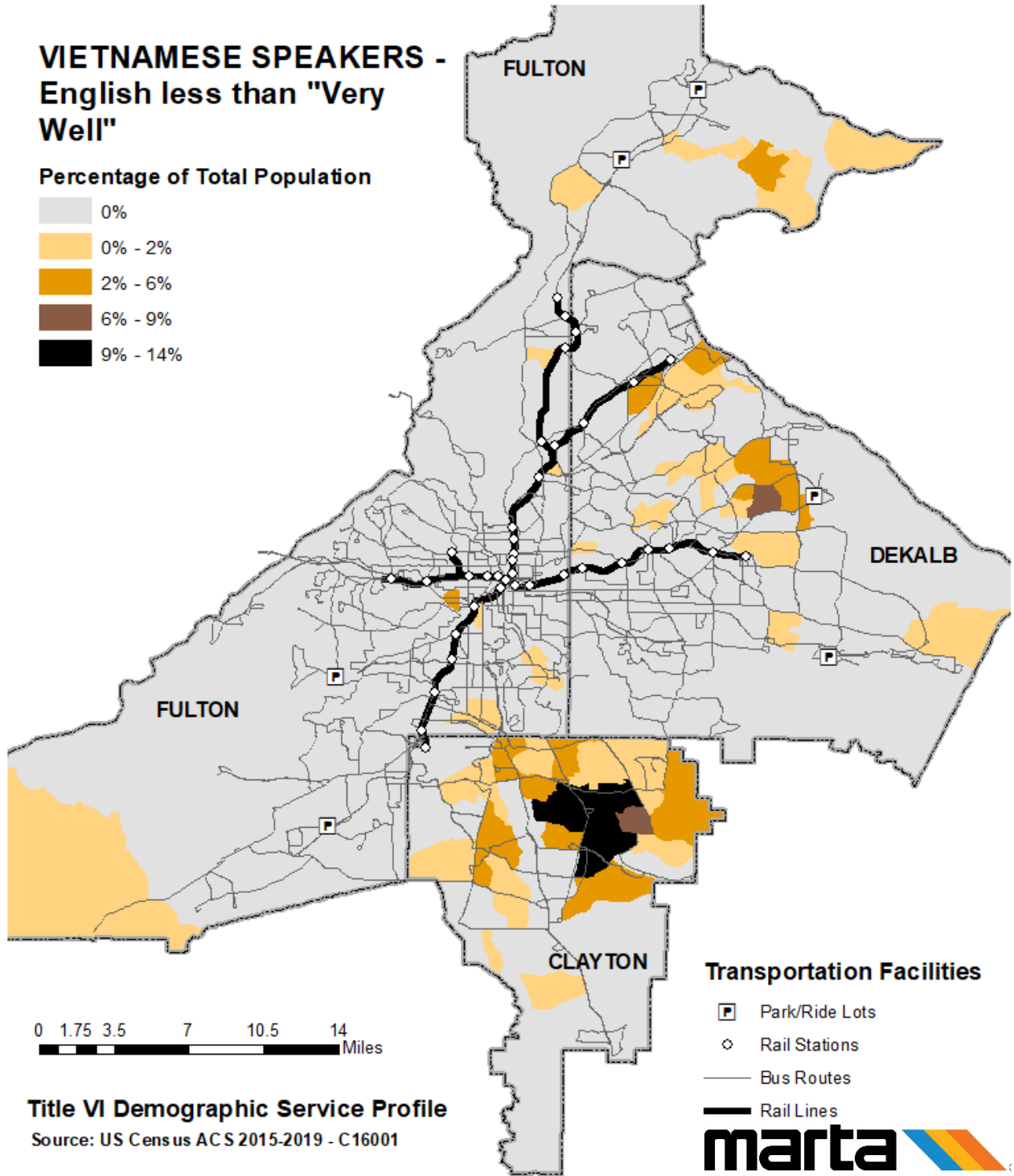
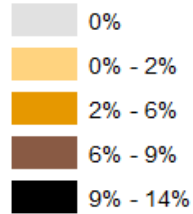
### Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines



# VIETNAMESE SPEAKERS - English less than "Very Well"

Percentage of Total Population

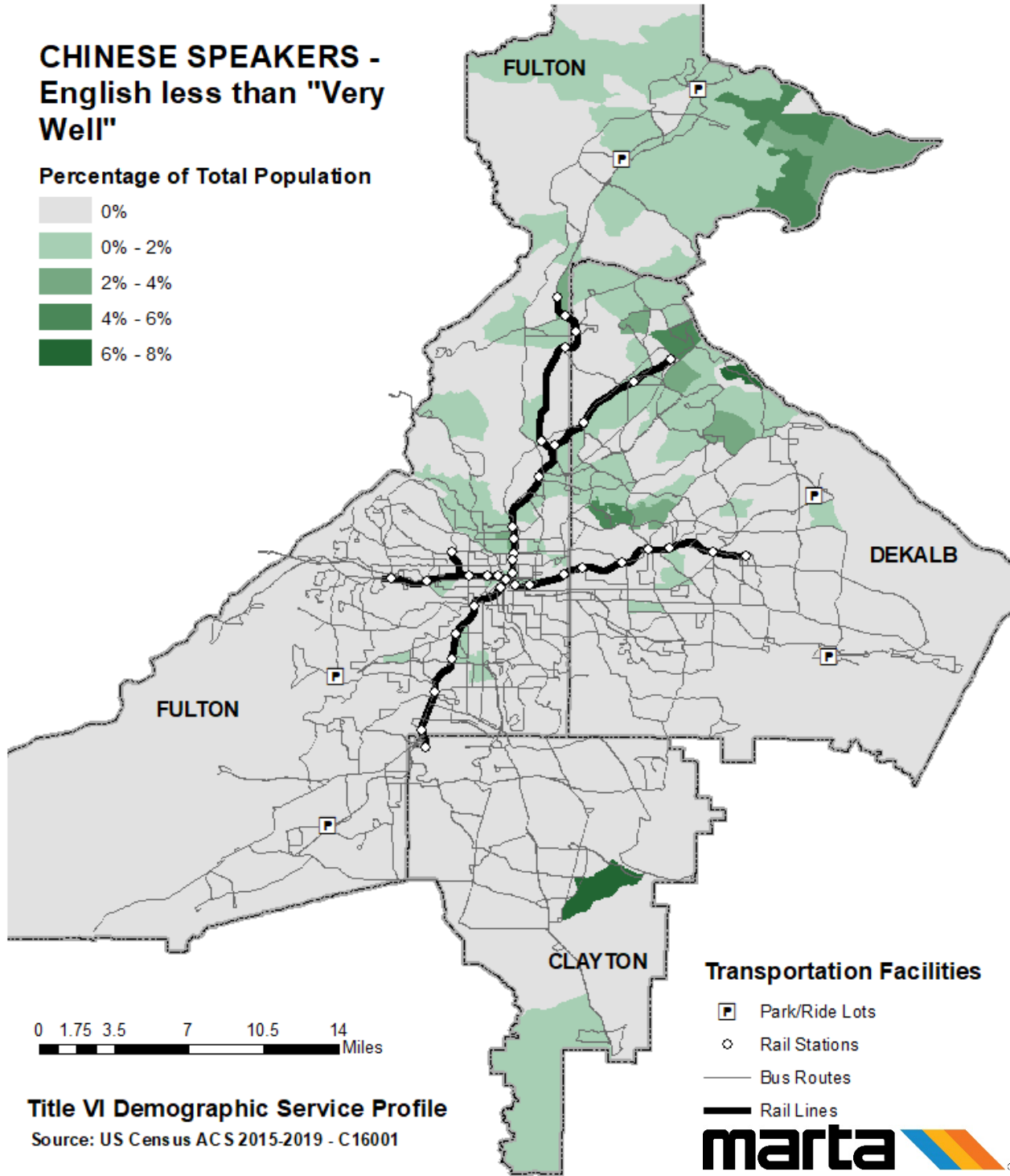
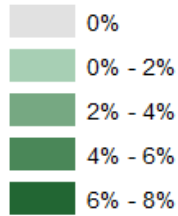


## Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - C16001

# CHINESE SPEAKERS - English less than "Very Well"




Percentage of Total Population



## Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - C16001

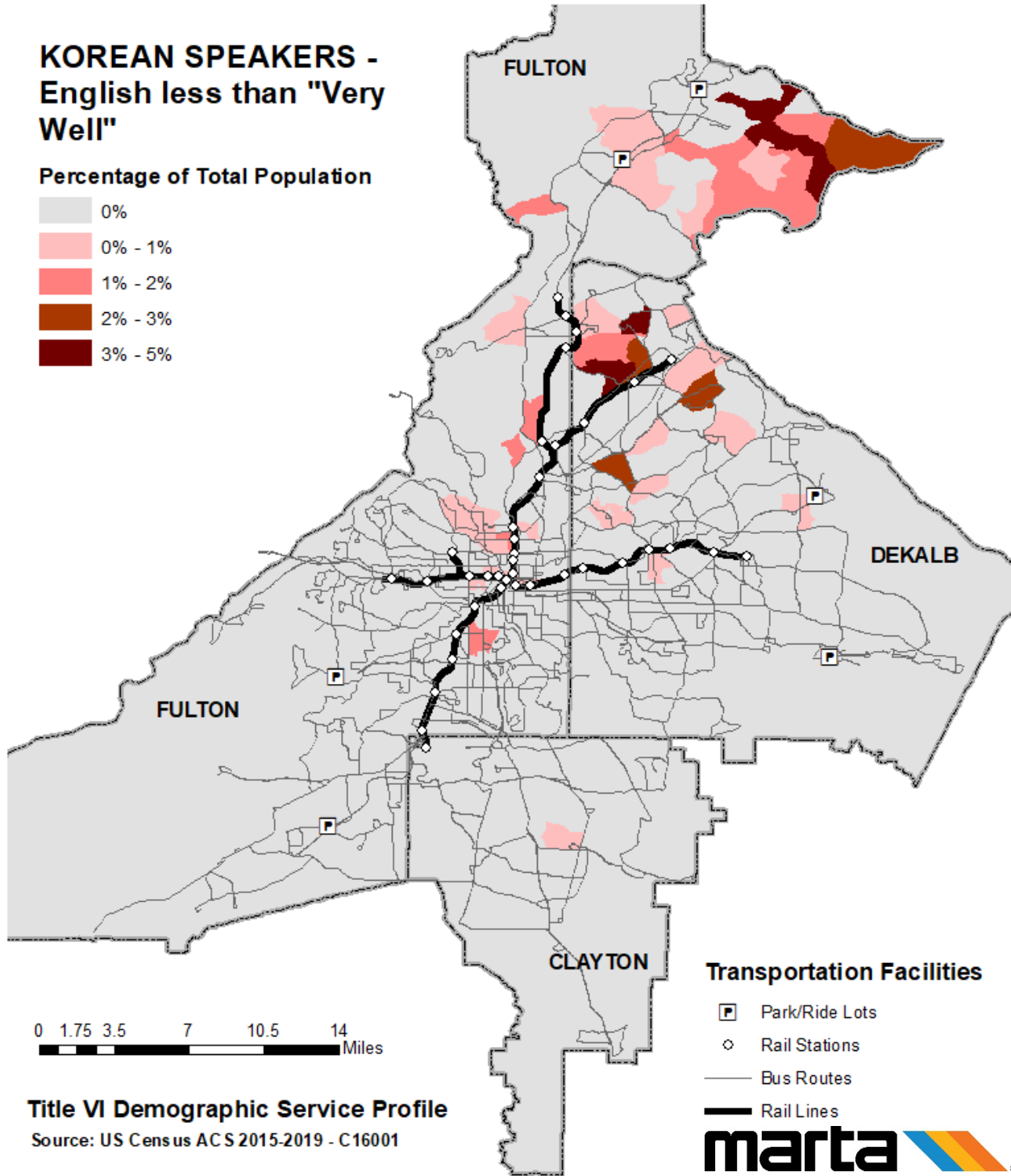
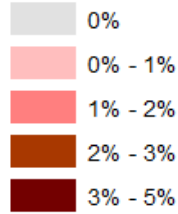
### Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines



# KOREAN SPEAKERS - English less than "Very Well"





Percentage of Total Population



## Title VI Demographic Service Profile

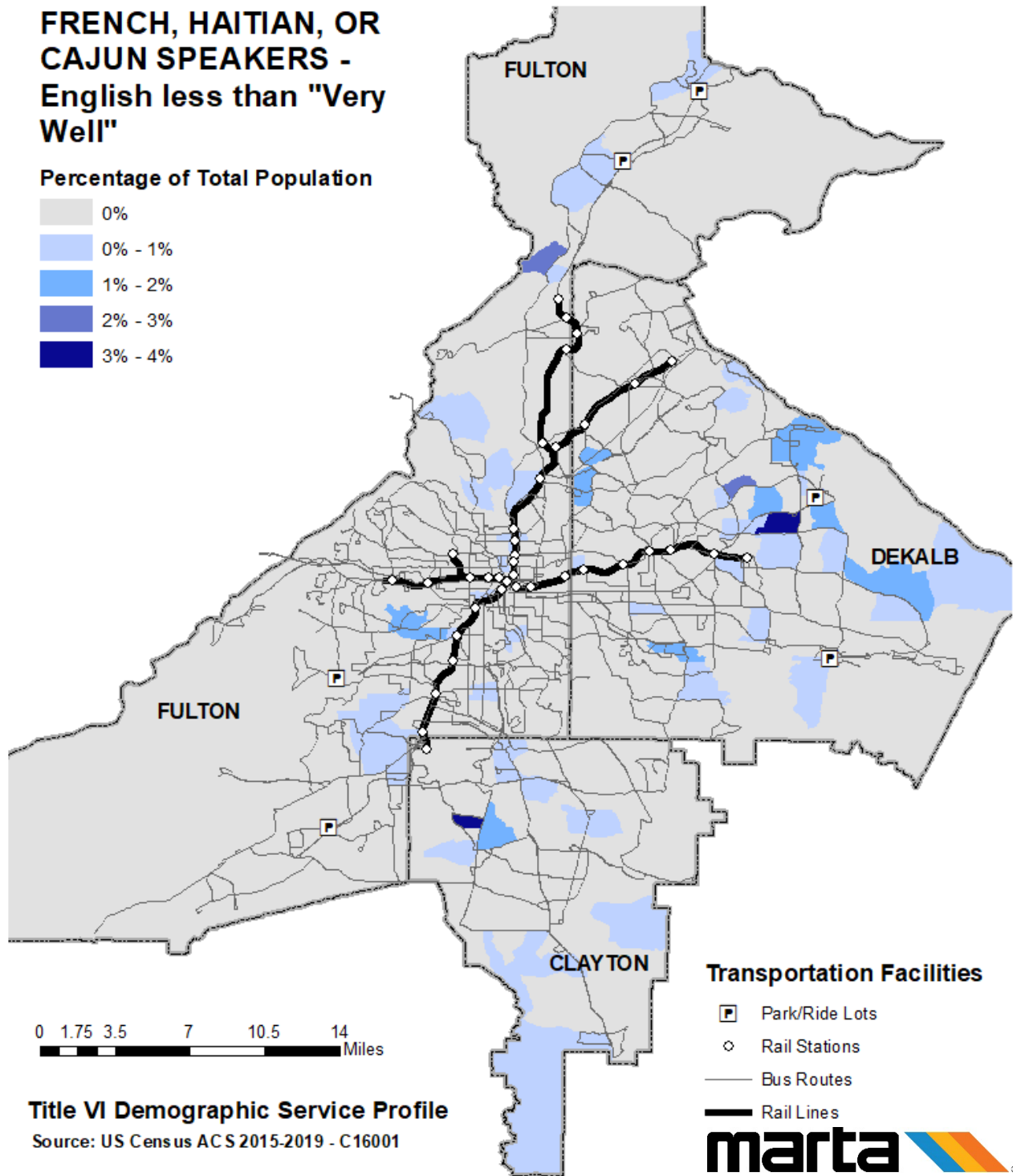
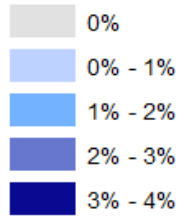
Source: US Census ACS 2015-2019 - C16001

### Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines

# FRENCH, HAITIAN, OR CAJUN SPEAKERS - English less than "Very Well"


Percentage of Total Population



## Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - C16001

### Transportation Facilities

-  Park/Ride Lots
-  Rail Stations
-  Bus Routes
-  Rail Lines



## Factor 2: The Frequency with Which LEP Individuals Come into Contact with MARTA Programs, Activities, and Services

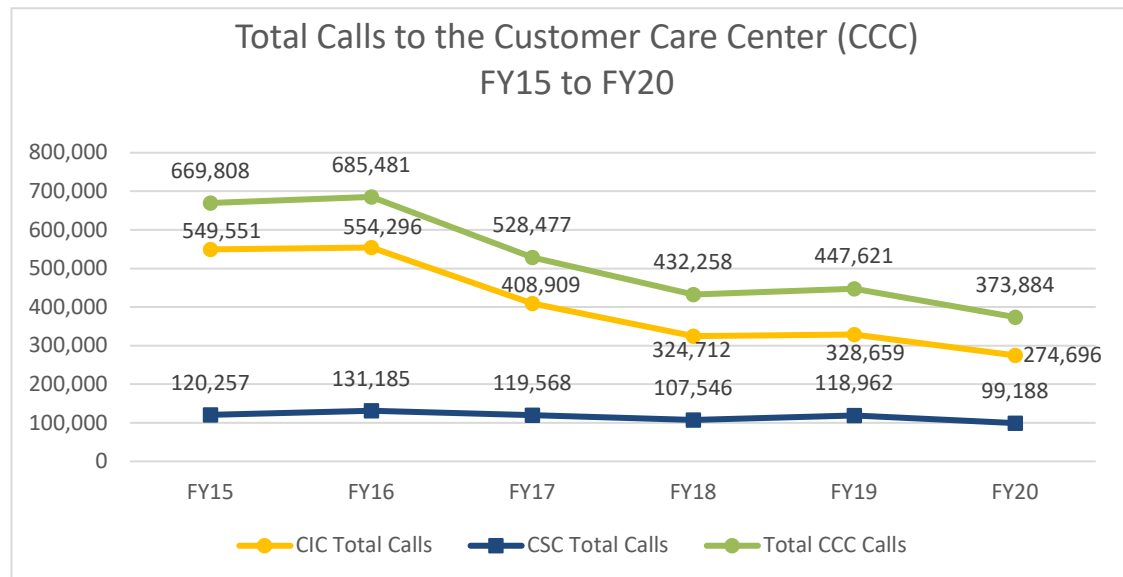
MARTA has considered the frequency of contact that patrons who speak different languages may have with MARTA services. In order to establish the frequency of contact by LEP persons, MARTA utilized a combination of the following resources:

- MARTA’s Customer Service Center Data
- Language Line Usage
- MARTA’s Quality of Service Survey
- Website Data

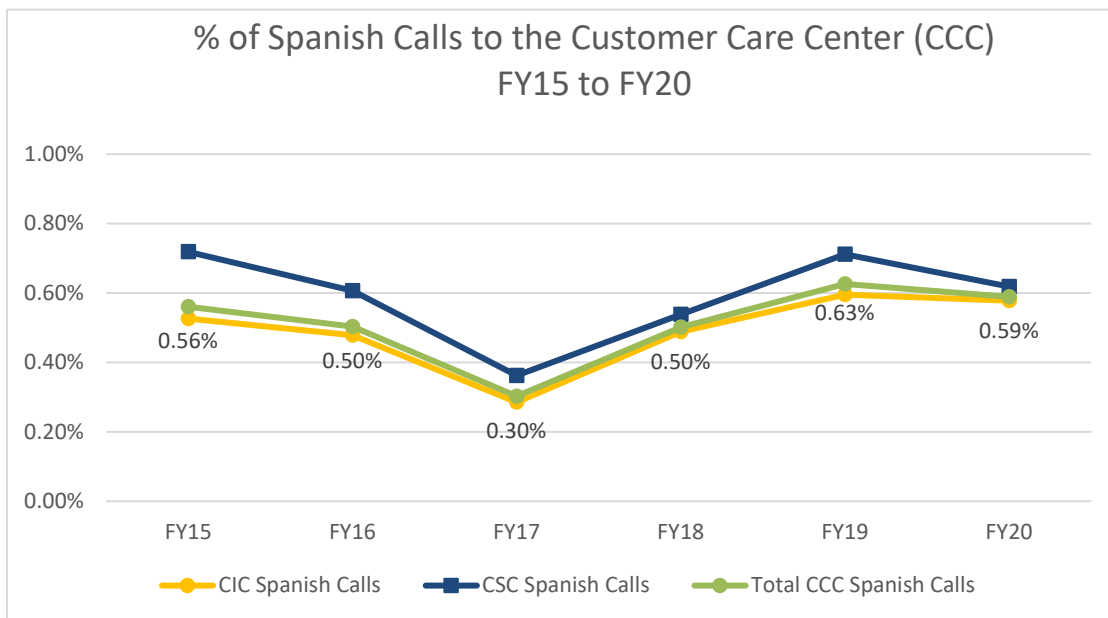
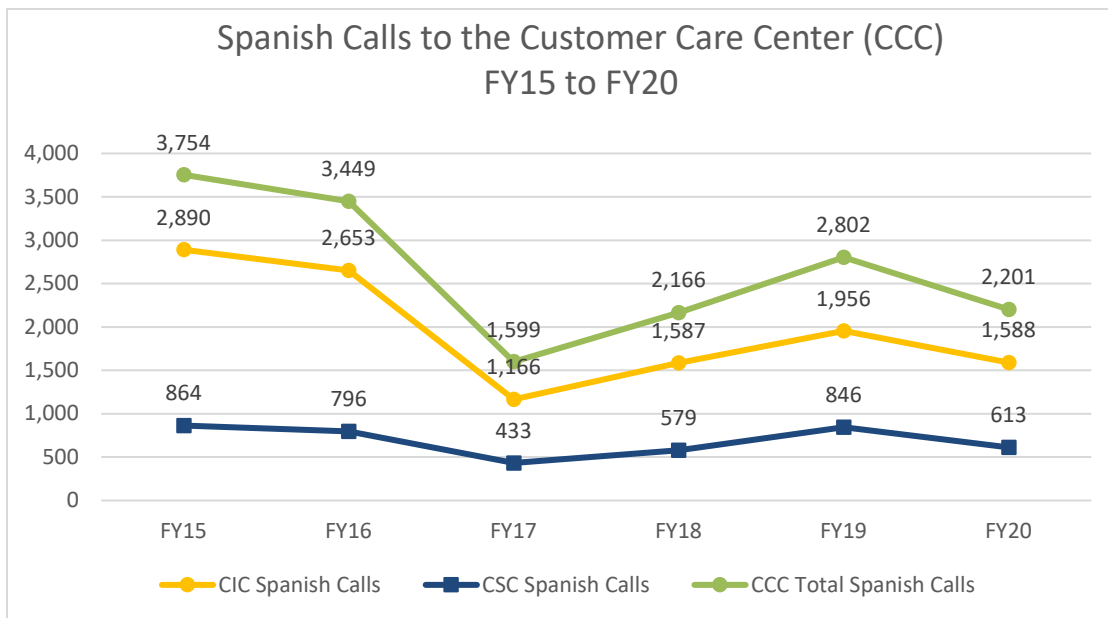
For MARTA programs, where public outreach or involvement is central to the mission, staff has and will continue to consider the appropriate outreach to LEP persons and how additional resources could increase the frequency of contact with those groups, triggering a higher level of language assistance and, therefore, participation.

### Customer Service Center Data

The Customer Care Center is comprised of two call centers, the Customer Service Center and Customer Information Center. The Customer Information Center (CIC) assists patrons with bus and rail schedules and trip itineraries while the Customer Service Center (CSC) handles customer complaints and concerns. Most total calls to the Customer Care Center are for Customer Information (CIC), although the number of CIC calls has been declining since FY13.



During FY2018, the Customer Care Center received 2,166 calls in which callers requested the Spanish automated phone system. Callers selecting the Spanish menu option were routed to bilingual Customer Care Center representatives if they were available. During fiscal years FY13 through FY18, less than 1% of calls to the Customer Care Center requested Spanish.



### **Language Line Translation Services Usage**

The Language Line Service is a company that is contracted to provide MARTA with a consistent 24-hour a day 7 days a week rapid access to high quality interpreters for more than 200 languages. Almost all calls using the language translation service are to MARTA administrative offices, primarily the Customer Care Center.

The following reflects the overall usage of the language line:

#### **2015 Calls to MARTA Administrative Offices (January 1, 2015 to December 31, 2015)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	4249	527	8.1	95.0%
Total – 12 languages	4474	552	8.1	

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	127	16	7.9	78.4%
Total – 5 languages	162	20	8.1	

#### **2016 Calls to MARTA Administrative Offices (January 1, 2016 to December 31, 2016)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	2627	316	8.3	78.8%
Total – 11 languages	3335	355	9.4	

**2016 Emergency Calls to MARTA Police (January 1, 2016 to December 31, 2016)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	298	44	6.8	86.9%
Total – 7 languages	343	50	6.9	

**2017 Calls to MARTA Administrative Offices (January 1, 2017 to December 31, 2017)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	3169	318	10.0	92.40%
Total – 9 languages	3430	336	10.2	

**2017 Emergency Calls to MARTA Police (January 1, 2017 to December 31, 2017)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	112	12	9.3	94.9%
Total – 2 languages	118	13	9.1	

**2018 Calls to MARTA Administrative Offices (January 1, 2018 to December 31, 2018)**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	4337	390	11.1	97.4%
Total – 7 languages	4453	400	11	

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes

Spanish	147	16	9.2	63.4%
Total – 2 languages	232	23	10.1	

**2019 Calls to MARTA Administrative Offices**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	3441	330	10.4	92.9%
Total – 9 languages	3702	353	10.5	

**2019 Emergency Calls to MARTA Police Services**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	49	7	7.0	36.3%
Total – 5 languages	135	14	9.6	

**2020 Calls to MARTA Administrative Offices**

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	3044	355	8.6	99.1%
Total – 4 languages	3071	358	8.6	

### 2020 Emergency Calls to MARTA Police

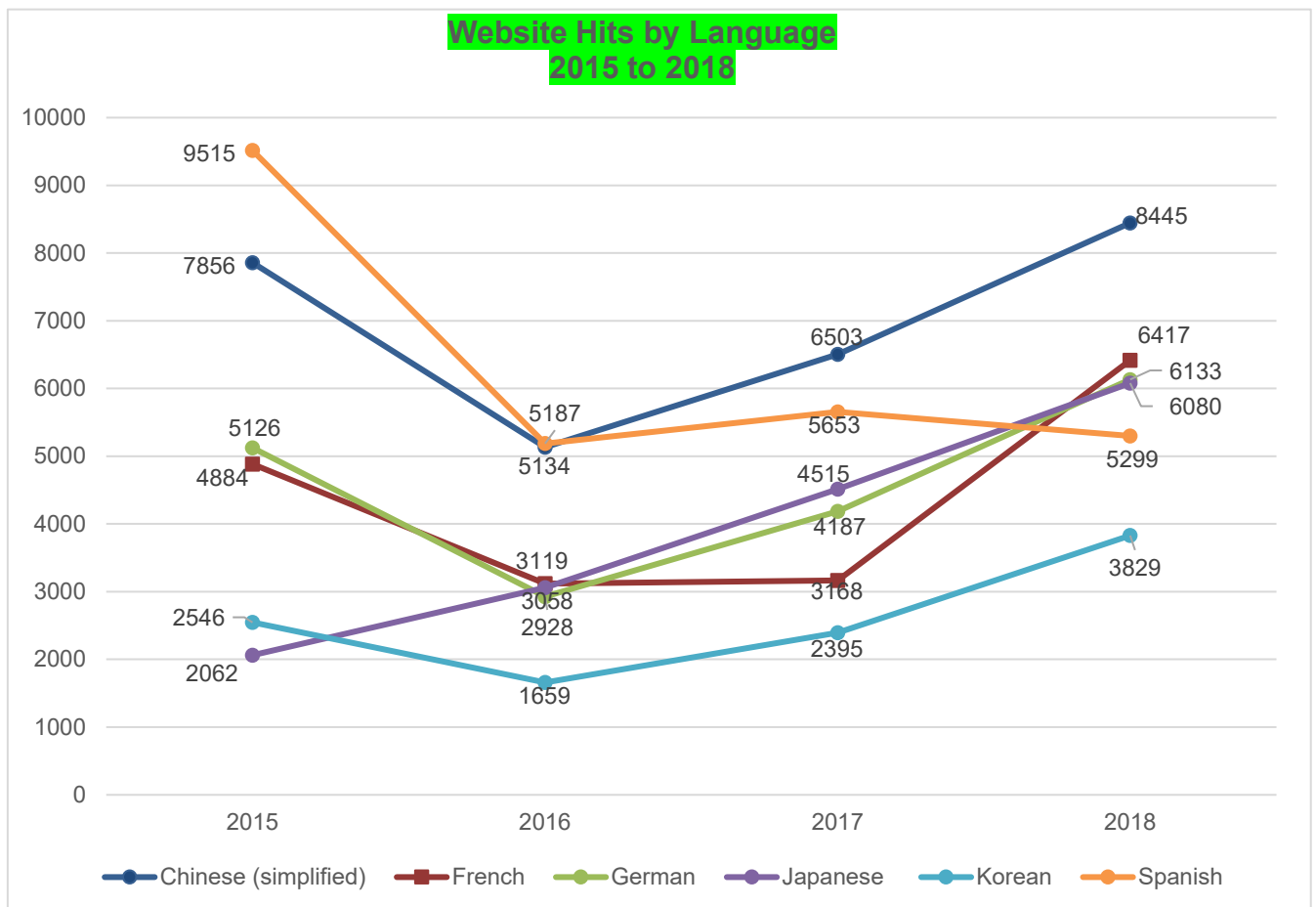
Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	183	18	10.2	75.6%
Total – 6 languages	242	25	9.7	

#### ***Assessment of the Language Line Use***

The vast majority of the LEP-related translation service calls were funneled through or came directly to the Customer Service Center, which handles customer complaints and general feedback. The second largest volume of calls came through the Customer Information Center which provides bus and rail scheduling as well as trip itinerary information. During the most recent fiscal year (FY20) Emergency Services directly used the language line 25 times.

### Website Hits by Language

The MARTA website, itsmarta.com, has a Google translate widget that allows visitors to translate the site into 6 languages other than English: Spanish, Chinese (simplified), French, German, Japanese, and Korean. The graph below shows website hits by language for FY15 through FY18.



### **Quality of Service Survey Data**

The Quality of Service (QOS) Survey is a comprehensive study that tracks customer satisfaction and perceptions for MARTA’s rail and fixed-route bus service. The QOS is also used to monitor demographics and usage behavior of MARTA patrons.

During FY20 surveyors in the MARTA Office of Research & Analysis conducted 5,065 face-to-face interviews on weekdays between 6:00 AM and 9:00 PM and on weekends between 9:00 AM and 9:00 PM.<sup>2</sup>

A total of 4,227 riders were surveyed on rail platforms at all MARTA rail stations and 838 riders were surveyed onboard a random selection of fixed-route buses. The data was weighted by time period and transit mode to match FY20 bus and rail ridership by mode and time period.

### **FY20 Quality of Service Survey: Primary Language Spoken at Home**

More than nine out of ten respondents of the FY20 QOS Survey reported that English was the primary language spoken at home (93.8%). The second most common language was Spanish (4.8%).

#### **FY20 Annual Quality of Service Survey: Primary Language Spoken at Home**

<b>Language</b>	<b>%</b>	<b>Language</b>	<b>%</b>
English	93.80%	Bengali	0.02%
Spanish	4.80%	Chinese (Traditional)	0.02%
Hindi	0.45%	Farsi	0.02%
French	0.23%	Japanese	0.02%
Chinese (Simple)	0.14%	Tagalog (Filipino)	0.02%
Amharic (Ethiopia)	0.13%	Turkish	0.02%
Arabic	0.06%	Ukrainian	0.02%
German	0.05%	Vietnamese	0.02%

<sup>2</sup> Quality of Service surveys were conducted during the first three quarters of FY20 only. Data collection was discontinued for the remainder of the fiscal year due to the COVID-19 pandemic.



Language	%	Language	%
Korean	0.05%	Lithuanian	0.01%
Dari (Afghanistan)	0.04%	Other	0.07%
		<b>Total</b>	<b>100.00%</b>

**FY18 Annual Quality of Service Survey: Primary Language Spoken at Home (Condensed)**

Language	Contact %
English	93.80%
Spanish	4.80%
Other	1.40%
<b>Total</b>	<b>100.00%</b>

**FY20 Quality of Service Survey:**

**Respondents Who Had Contacted MARTA within Past 30 Days**

Survey participants were asked whether they had contacted MARTA within the previous 30 days. The tables below show the distribution of respondents who contacted MARTA and the offices they called. Please note that these questions were asked among a sub-group of respondents and the sample sizes are very small, especially for those who spoke a language other than English.

**FY20 Annual Quality of Service Survey: Count and Percent Who Contacted MARTA in Past 30 Days by Language Spoken at Home**

	English	Spanish	Other
Yes	307 9.9%	8 5.3%	13 27.5%
No	2806 90.1%	151 94.7%	34 72.5%
<b>Total</b>	3112 <b>100.0%</b>	159 <b>100.0%</b>	47 <b>100.0%</b>

**If contacted MARTA, who did you call?**

	English	Spanish	Other
Customer Information Center	112 36.5%	3 33.6%	0 0.0%
Customer Service Center	158 51.6%	5 57.4%	10 77.1%
Other Office	43 14.1%	1 9.0%	3 22.9%
<b>Total</b>	306 100.0%	8 100.0%	13 100.0%

### ***Analysis of LEP Contact Frequency***

From FY15 to FY20 there was a decline in the number of MARTA patrons who used the Spanish menu option when contacting the Customer Care Center. This decline in Spanish menu calls mirrors a decline in total calls to the Customer Service Center. The *percentage* of Spanish menu calls, however, has remained stable at 0.59%.

The number of patrons who have requested the Language Line Translation Service has decreased since FY15, with the highest number of translation requests occurring in FY15. Almost all Language Line Translation Service calls have been for Spanish. Spanish also continues to be the most common non-English language by surveyors who conduct the Quality-of-Service Survey (4.80% in FY20).

On the MARTA website, the number of Spanish translation hits has decreased since 2015 when the most often used translation option, by far, was Spanish, followed by Chinese (simplified). However, the following year Spanish translations dropped while translations to other languages began to increase. By 2020, the number of hits for Spanish was surpassed by all other language options.

### **Factor 3: The Importance to LEP Persons of Your Program, Activities and Services**

Once MARTA assessed which LEP populations and languages were most frequently encountered, the importance of MARTA programs, activities, or services to LEP individuals were considered. As a general rule, the more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services will be needed. If the denial or delay of access to services or information could have serious implications for the LEP individual, procedures should be in place to provide language assistance to LEP persons as part of standard business practices.

General access to transportation, customer service, public hearings/community forums, and emergency services are considered to be the most important links between LEP populations and MARTA. The ability for LEP populations to utilize bus and rail services is vitally important. Therefore, MARTA has signage in stations in both English and Spanish. Information in relation to bus routes and customer service support are available to LEP populations in Spanish and various languages. The Language Line provides vital connections between LEP populations and access to Police Services, Customer Care Services including rail and bus line information.

MARTA anticipated that LEP communities (i.e., Hispanic, Chinese, Korean, and Vietnamese) would require additional outreach, in relation to community forums and public hearings. For public hearings and community forums, MARTA provides or acquires translators and announcements in alternative formats and multiple languages to ensure

that information is properly conveyed to respective LEP populations. In addition, MARTA advertises public hearings in the primary languages used by LEP populations including Spanish, Chinese, Korean, and Vietnamese.

#### **Factor 4: The Resources Available and the Costs**

##### **Resources**

##### **Oral Interpretation Services**

MARTA has identified the resources available to ensure that language assistance is provided to LEP persons participating in our programs or activities. MARTA demographics, frequency, and importance of contact will dictate the level of language services MARTA will commit to provide. Some language services are provided at little or no cost, such as using community volunteers or bilingual staff as interpreters. Using a telephone language line is less expensive than hiring an interpreter. In order to meet LEP Program requirements, MARTA will continue to explore various means of delivering competent and accurate language services as cost are also considered.

##### **Written Translation Services**

Based on the Safe Harbor Provision guidelines under FTA Circular 4702.1B, MARTA will weigh the costs and benefits of translating vital documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical transit information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in an LEP group, and other relevant factors.

As outlined under the Safe Harbor Provisions, when there are more than 50 persons in a language group that reaches the 5% trigger, MARTA will translate vital written materials. If there are fewer than 50 persons in a language group that reaches the 5% trigger, MARTA will provide written notice, in the primary language of the LEP group, of the right to receive competent oral interpretation of free written materials.

MARTA will undertake this examination when an eligible LEP group constitutes 5% of an eligible client group (for example, 5% of MARTA's service area) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered.

MARTA is committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. MARTA is committed to expending necessary resources on language services, which includes: the publication of Riders Guide in other languages, printing of bus schedules and service change announcements in Spanish, website translation software, and bilingual staff in the call center, and bilingual surveyors in the administrative offices to make station announcements as needed.

In response to the needs of the Spanish-speaking population, the largest language-minority population MARTA serves, MARTA routinely translates publications into Spanish, commonly provides interpretation services in Spanish, and has Spanish-speaking customer-service representatives at its customer care call centers. MARTA translates publications in Chinese, Korean, Vietnamese, and other languages upon request and as needed during specific outreach activities/events.

### Cost of Translations 2019 - 2021:

<b>2019</b>			
<b>Translation Source</b>	<b>Event</b>	<b>Date</b>	<b>Cost</b>
<b>(API) Formerly AALS (Chinese, Korean, Vietnamese)</b>	January Public Hearing	1/8/2019	\$1,597.48
	Gwinnett County	2/15/2019	\$95.00
	May Public Hearing	5/5/2019	\$1,594.00
	September Public Hearing	9/7/2019	\$1,505.32
<b>True Language (Spanish)</b>	Hiring Bus Operator	Nov-19	\$283.50
	Service Change	Dec-19	\$166.89
	Breeze Card Expiration	Dec-19	\$147.00
	Breeze Pop-up	Jul-19	\$170.00
<b>Mundo Hispanico (Spanish) Cost of translation included in cost to run.</b>	January Public Hearing Notice	Jan 10 - Jan 17	\$1,300.00
	May Public Hearing Notice	5/9/2019	\$725.00
	September Public Hearing Notice	9/12/2019	\$925.00
		<b>Total</b>	<b>\$8,509.19</b>
<b>2020</b>			
<b>Translation Source</b>	<b>Event</b>	<b>Date</b>	<b>Cost</b>
<b>(API) Formerly AALS (Chinese, Korean, Vietnamese)</b>	January Public Hearing	2/5/2020	\$1,731.40
	May Public Hearing	5/13/2020	\$1,517.80
<b>True Language (Spanish)</b>	Service Modification	Dec-20	\$435.00
	Bus Service Modification	Dec-20	\$383.31
	Mobility	Dec-20	\$320.00
	Chamblee Drice Way Closure	Jan-20	\$170.00
	Breeze Program Pop-Up	Jan-20	\$207.50

	Fresh MARTA Market	July-20	\$212.50
	Rider's Advisory Counsel	Feb-20	\$175.00
	COVID	Mar-20	\$212.50
	COVID Bus Decals	Mar-20	\$207.50
	Bus Service Modification	Apr-20	\$248.75
	Gwinnett County Fact Sheet	Feb-20	\$357.77
	Gwinnett County	Feb-20	\$357.00
	Gwinnett County Brochure & Fact Sheet	Feb-20	\$850.69
<b>Mundo Hispanico (Spanish) Cost of translation included in cost to run.</b>			
	Bus Modifications Public Hearing	4/15-4/22	\$1,900.00
	January Public Hearing	2/6/2020	\$925.00
	May Public Hearing	5/14/2020	\$925.00
		<b>Total</b>	<b>\$11,136.72</b>
<b>2021</b>			
<b>Translation Source</b>	<b>Event</b>	<b>Date</b>	<b>Cost</b>
<b>(API) Formerly AALS (Chinese, Korean, Vietnamese)</b>			
	May Public Hearing	4/26/2021	\$1,798.00
	June Public Hearing	5/31/2021	\$1,810.84
	September Public Hearing	9/7/2021	\$1,860.76
	Track Replacement 2021	1/26/2021	\$2,631.18
<b>True Language (Spanish)</b>	Community Alert	October-21	\$206.25
	Full Bus Restoration	March-21	\$178.75
	Mobility Town Hall	April-21	\$178.75
	AVIS Sign	April-21	\$206.25
	Public Hearing	April-21	\$178.75
	New Rail Car	May-21	\$178.75
	Track Replacement 2021	June-21	\$137.50
	Fresh MARTA Market	July-21	\$212.50
	December 18 Service Modifications	November-21	\$137.50
	MARTA Reach Pilot Flyer SPA and VIET	December-21	\$387.50

	Track Replacement 2022	December-21	\$137.50
<b>Mundo Hispanico (Spanish) Cost of translation included in cost to run.</b>	May Public Hearing Notice	6/3/2021	\$900.00
	June Public Hearing Notice	4/29/2021	\$1,700.00
	September Public Hearing Notice	9/9/2021	\$900.00
	Track Replacement 2021	1/28-2/11	\$2,800.00
		<b>Total</b>	<b>\$16,540.78</b>
		<b>Grand Total</b>	<b>\$36,186.69</b>

### **MARTA Outreach Activities and Public Hearings 2019 - 2021**

<b>Public Hearing/Engagement Activities</b>	<b>Day(s)</b>	<b>Date(s)</b>	<b>Time(s)</b>	<b>Location(s)/Method</b>
MARTA Pop-up Breeze Location	Thursday	June 13, 2019	10:00 AM - 2:00 PM	North DeKalb Senior Center
MARTA Pop-up Breeze Location	Thursday	June 20, 2019	10:00 AM - 2:00 PM	Louise Watley Library
MARTA Pop-up Breeze Location	Thursday	June 27, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	July 11, 2019	10:00 AM - 2:00 PM	Lou Walker Senior Center
MARTA Pop-up Breeze Location	Thursday	July 18, 2019	10:00 AM - 2:00 PM	Harriett G. Darnell Sr Multi-Purpose Center
MARTA Pop-up Breeze Location	Thursday	July 25, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	August 8, 2019	10:00 AM - 2:00 PM	Wesley Chapel - William C. Brown Library

MARTA Pop-up Breeze Location	Thursday	August 15, 2019	10:00 AM - 2:00 PM	Northwest Library at Scotts Crossing
MARTA Pop-up Breeze Location	Thursday	August 22, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	September 12, 2019	10:00 AM - 2:00 PM	Chamblee Library
Proposed Service Modifications - Effective for December 2019	Monday	September 16, 2019	6:00 PM	in-person Dekalb County Public Library
MARTA Pop-up Breeze Location	Thursday	September 19, 2019	10:00 AM - 2:00 PM	Roswell Neighborhood Senior Center
MARTA Pop-up Breeze Location	Thursday	September 26, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	October 10, 2019	10:00 AM - 2:00 PM	South DeKalb Senior Center
MARTA Pop-up Breeze Location	Thursday	October 17, 2019	10:00 AM - 2:00 PM	Dorothy C. Benson Multipurpose Center
MARTA Pop-up Breeze Location	Thursday	October 24, 2019	10:00 AM - 2:00 PM	Charley Griswell Senior Center
Mobility Town Hall 2019	Tuesday	October 29, 2019	6:00 PM	In-person MARTA Headquarters
MARTA Pop-up Breeze Location	Thursday	November 7, 2019	10:00 AM - 2:00 PM	Frank Bailey Senior Center
MARTA Pop-up Breeze Location	Thursday	November 14, 2019	10:00 AM - 2:00 PM	Decatur Library
MARTA Pop-up Breeze Location	Thursday	November 21, 2019	10:00 AM - 2:00 PM	Hapeville Neighborhood Senior Center
MARTA Pop-up Breeze Location	Thursday	December 12, 2019	10:00 AM - 2:00 PM	DeKalb/Atlanta Senior Center
MARTA Pop-up Breeze Location	Thursday	December 17, 2019	10:00 AM - 2:00 PM	Clayton Headquarters Library
MARTA Pop-up Breeze Location	Thursday	December 19, 2019	10:00 AM - 2:00 PM	Sandy Springs Library Branch



MARTA Pop-up Breeze Location	Thursday	January 16, 2020	2:30 PM - 6:30 PM	South Clayton Recreation Center
Proposed Service Modifications - Effective for April 2020	Tuesday	February 11, 2020	6:00 PM	in-person East Point City Annex
Proposed Service Modifications - Effective for April 2020	Saturday	February 15, 2020	11:00 AM	in-person Dekalb Chamblee Library
MARTA Pop-up Breeze Location	Thursday	February 20, 2020	10:00 AM - 2:00 PM	Lou Walker Senior Center
FY 21 Operating and Capital Budgets	Monday	May 18, 2020	11:00 AM	Virtual
FY 21 Operating and Capital Budgets	Tuesday	May 19, 2020	6:30 PM	Virtual
Clayton County Updates - Capital Project Activities	Wednesday	September 23, 2020	6:30 PM	Virtual (Zoom and phone access)
Clayton County Updates - Capital Project Activities Community Meeting	Saturday	September 26, 2020	12:00 PM	Virtual (Zoom and phone access)
Cleveland Ave/Metropolitan Pkwy - ART Project	Wednesday	November 18, 2020	6:30 PM	Virtual (Live itsmarta.com, Zoom & Audio)
Summerhill BRT Meeting	Thursday	November 19, 2020	6:30 PM	Virtual (Zoom and phone access)
Cleveland Ave/Metropolitan Pkwy-ART Project	Friday	November 20, 2020	10:30 AM	Virtual (Live itsmarta.com, Zoom & Audio)
Track Replacement Project - Major Rail Service Impacts - Canterbury	Thursday	January 28, 2021	6:30 PM	Virtual & street canvassing
Track Replacement Project - Major Rail Service Impacts - Canterbury	Saturday	January 30, 2021	11:00 AM	Virtual & street canvassing
Clayton Bus Rapid Transit	Thursday	April 15, 2021	6:30 PM	Virtual (3 ways to join)
Clayton Bus Rapid Transit	Saturday	April 17, 2021	11:00 AM	Virtual (3 ways to join)

Mobility Town Hall 2021	Thursday	April 22, 2021	6:30 PM	Virtual (2 ways to join)
Mobility Town Hall 2021	Saturday	April 24, 2021	1:00 PM	Virtual (2 ways to join)
Essential Services Plan - Notice of Service Reinstatement	Saturday	April 24, 2021	NA	Website, social media, TV
FY 22 Operating and Capital Budgets	Monday	May 10, 2021	11:00 AM	Virtual
FY 22 Operating and Capital Budgets	Tuesday	May 11, 2021	6:30 PM	Virtual
Streetcar East Extension Project - Public Meeting	Thursday	May 27, 2021	6:00 PM	Virtual
Public Hearing Proposed Service Modifications - Effective August 2021	Wednesday	June 9, 2021	7:00 PM	Virtual (Audio Access)
Campbellton Corridor Transit Project	Thursday	June 10, 2021	6:30 PM	Virtual (3 ways to join)
Public Hearing Proposed Service Modifications - Effective August 2022	Saturday	June 12, 2021	11:00 AM	Virtual (Audio Access)
Campbellton Corridor Transit Project - Pop-up Open House	Tuesday	July 27, 2021	9:00 AM - 5:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project - Pop-up Open House	Wednesday	July 28, 2021	9:00 AM - 5:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project - Pop-up Open House	Saturday	July 31, 2021	9:00 AM - 12:00 PM	Fort McPherson LRA In-person
Campbellton Corridor Transit Project	Saturday	August 21, 2021	10:00 - 2PM	In-person Andrew & Walter Young YMCA
Proposed Service Modifications - Effective December 18, 2021	Tuesday	September 14, 2021	6:00 PM	In-Person Flint River Community Center
Proposed Service Modifications - Effective December 18, 2021	Wednesday	September 15, 2021	11:00 AM	Virtual (3 ways)

Proposed Service Modifications - Effective December 18, 2021	Thursday	September 16, 2021	6:00 PM	In-person MARTA Headquarters
Bus Network Redesign	Tuesday	November 9, 2021	11:00 AM	In Person Andrew & Walker Young Family YMCA
Cleveland Ave/Metropolitan Pkwy - Transit Project	Friday	November 10, 2021	10:30 AM	Virtual (Live itsmarta.com, Zoom & Audio)
Bus Network Redesign	Thursday	November 11, 2021	6:00 PM	In- person Decatur Conference Center
Bus Network Redesign	Saturday	November 13, 2021	11:00 AM	In-person Stage Door Theatre
Bus Network Redesign	Thursday	December 2, 2021	11:00 AM	Virtual (Zoom & Audio)
Bus Network Redesign	Tuesday	December 7, 2021	6:00 PM	Virtual (Zoom & Audio)
Essential Services Plan - Notice of Service Reduction	Saturday	December 18, 2021	N/A	Website, social media, TV

## Office of Diversity and Inclusion – LEP related outreach efforts 2019 - 2021

### D&I also conducted cultural celebrations including:

- D&I utilized various social media and email to send cultural announcements and information.
- National Hispanic Heritage Month: In celebration, D&I showcased posters identifying Hispanics and their contributions.
- National Asian and Pacific American Heritage Month: In celebration, D&I showcased posters identifying Asian/Pacific Americans and their contributions.
- Black History Month: In celebration, D&I showcased posters identifying Black Americans and their contributions.
- Women’s History Month: In celebration, D&I showcased posters identifying women and their contributions and conducted programs for women owned businesses.
- Older Americans Month: Highlighted the services available to the Senior workforce and community as a whole
- Jewish American Heritage Month: In celebration, D&I showcased posters identifying Jewish Americans and their contributions.

- LGBT Pride Month: In celebration, D&I showcased posters recognizing the LGBTQ community and their contributions. MARTA highlighted LGBT Pride Month with visual displays in various Stations
- Caribbean American Heritage Month: In celebration, D&I showcased posters identifying Caribbean Americans and their contributions, and highlighted employees.
- Disability Pride Month: In celebration, D&I highlighted members of our MAC committee.
- Native American Heritage Month: In celebration, D&I showcased posters identifying Indigenous Americans and their contributions.
- Veterans Day: In celebration, D&I showcased posters recognizing Veterans for their contributions.
- At the suggestion of the GM, The D&I Office organized Inclusion Matters Workshops for Companies that do business with MARTA to encourage DBE participation.

**Active community organization memberships include:**

- Georgia Hispanic Chamber of Commerce
- Georgia Hispanic Construction Association
- NAAAP-Atlanta Chapter
- Japan American Society of Georgia
- National Black MBA Association – Atlanta Chapter
- Disability IN
- US Minority Contractors Association

**MARTA has also participated in events as a partner with paid booths and in-kind services with the following organizations:**

- American Association for Access, Equity and Diversity
- Asian Indian Chamber of Commerce
- Atlanta Business League
- Atlanta Tribune
- Women's Transportation Seminar
- Who's Who in Asian American Communities
- The Equity Administrator was recognized by the Georgia Diversity Council in 2020 with the DisAbility Leadership Award
- D&I was recognized by the Georgia Hispanic Construction Association as the Government Partner of the year in 2021

### Human Resources – Recruiting Outreach:

<b>Date</b>	<b>Event</b>	<b>Organization</b>	<b>Demographic</b>
6/24/2021	38 <sup>th</sup> Annual Job Expo (Hybrid)	Latin American Association	Spanish Speaking
6/25/2019	37 <sup>th</sup> Annual Career Expo	Latin American Association	Spanish Speaking
6/26/2019	From Deployment to Employment, Hire Veterans with Disabilities	Department of Labor	Veterans with disabilities
6/27/2019	Georgia Voc. Rehab Job Fair	GA Voc. Rehab	Individuals w/disabilities
8/21/2019	Job Fair	Latin American Association	Spanish Speaking
9/20/2019	4th Annual Refugee Employment Summit	Friends of Refugees	Refugees
6/24/2021	38 <sup>th</sup> Annual Job Expo (Hybrid)	Latin American Association	Spanish Speaking
10/23/2019	DisAbility Awareness Forum & Career Expo	DisAbility Link	Individuals w/disabilities
10/15/2021	DisAbility Link Annual Career Expo	DisAbility Link	Individuals w/disabilities

## IX. Language Access Plan

MARTA's Four-Factor Analysis suggest that MARTA should continue to translate vital documents and provide oral interpretations in the Spanish language, and upon request or as appropriate to the common Asian languages (Vietnamese, Chinese and Korean). MARTA will continue to monitor the growth of the French-speaking population and evaluate the need for inclusion of the French-language. MARTA's Four-Factor Analysis provided the basis for the development of updated language assistance services which include a mix of services currently provided as follows:

### **Providing Notice to the LEP Community Regarding Language Assistance Availability**

Notices will be provided to the LEP community in the following manner:

- At each MARTA public building entry point or lobby, signage shall be posted in the most commonly spoken languages stating that interpreters are available and free of charge to LEP individuals. MARTA also maintains translated written forms and documents for LEP individuals. Notices are also posted on the MARTA Website. In addition, public hearing and meeting notices also contain information advising LEP persons of how to obtain language services.
- In the case of illiteracy or languages into which written materials have not been translated, such forms and documents will be read to LEP individuals in their primary languages, utilizing available MARTA volunteer staff members and/or paid interpreters or language line services.

### **Written Translation of Vital Documents**

MARTA is committed to ensuring that publications intended for public outreach or public involvement, where appropriate, will be also offered in a variety of languages as needed in the service area.

Some MARTA departments require interaction with the public as a part of daily operations and include contact with one or more LEP populations. If these interactions include letters, notices, or forms, and the nature of these documents would be considered of critical importance to the LEP person, consideration shall be given to written translation of the documents or forms.

It is important to make an assessment as to the population percentage and the frequency and importance of the contact when considering the potential for translating these documents. The departments most likely to encounter the need to translate vital

documents are Government Relations, Planning, D&I, Marketing, HR, and Contracts and Procurement.

Examples of vital documents that require consideration for translation in Spanish (Georgia’s largest LEP population in the MARTA service area) are as follows:

- Title VI Complaint Process/Form
- ADA Complaint Process/Form
- MARTA Mobility Application
- Reduced Fare Applications
- MARTA Mobility Guide
- Bus and rail schedules
- How to Ride MARTA Guide
- Notices of proposed public hearings regarding proposed transportation plans, projects, or changes.
- Emergency transportation information as needed

Whether or not a document (or the information it solicits) is “vital”, will depend on the importance of the program, information, encounter, or service involved and the consequence to the LEP person if the information in question is not accurate or timely disseminated.

D&I encourages, monitors, and assists departments in determining which documents are “vital” to the meaningful access of the LEP populations. Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights and services is an important part of “meaningful access”, as a lack of awareness may effectively deny LEP individuals meaningful access. Where individual departments are engaged in community outreach efforts as part of their programs and activities, regular assessments of the needs of the populations frequently encountered or affected by the program are analyzed to determine whether certain critical outreach materials should be translated. Community organizations are used to determine what outreach materials may be most helpful to translate and some translations may be made more effective when done in tandem with outreach methods including using ethnic media, schools, religious, and community organizations to spread a message.

Sometimes very large documents may include both vital and non-vital information. For example, a document title and phone number for obtaining more information may be critical, but the document itself may contain additional non-vital information. In a case like this, vital information may be provided in an alternative language and an LEP person might be advised of how to request a translation of the entire document as needed.

## Oral Language Interpretation Services

The Language Line Services is a company that is contracted to provide MARTA with a consistent 24-hour a day 7 days a week rapid access to high quality interpreters for over 200 languages.

In addition, MARTA utilizes:

- Bilingual Staff that are competent in the skill of interpreting languages in written and/or oral formats.
- Volunteer interpreters from community minority organizations who are trained and competent in the skill of interpreting.
- Qualified paid language interpreters; and
- Qualified paid sign language interpreters.

LEP persons are not obligated to provide their own interpreter, although many do so or have such services provided by another resource. In some areas such as police services, it may be important for legal or safety reasons to provide a qualified outside interpreter rather than use a family member or friend of the LEP person.

MARTA will not pass on the cost to our customers for providing language assistance to meet its LEP requirements. With the exception of translating written materials, the cost of language assistance is generally fairly minimal. MARTA will provide competent interpreters and other oral language assistance in a timely manner.

Training staff on the procedures of providing language assistance and how to determine whether and what type of language services a customer needs is essential to bridging the gap between policies or procedures and actual practices. Training includes how to obtain language assistance services and how to communicate needs to interpreters and translators.

Although the use of an interpreter who is qualified is essential, it does not necessarily mean formal certification as an interpreter is required.

Certification may be helpful, but at a minimum, a qualified paid interpreter needs to:

- Be proficient in and have the ability to communicate accurately in both English and in the other language, as well as employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation);
- Have knowledge in both languages of any specialized terms or concepts particular to the program.
- Understand and follow confidentiality and impartiality rules to the same extent as



the LEP person for whom they are interpreting or to the extent that their position requires; and

- Understand and adhere to their role as interpreter without deviating into a role as counselor, legal advisor, or another inappropriate role.

### **Procedure for Accessing Interpreting Services**

Language interpretation services are accessed through the following protocols:

- The Customer Information Center is required to have a minimum of one bilingual operator on duty, per shift, to assist with requests from MARTA's Spanish LEP population.
- Telephone communication with LEP Callers: When a non-bilingual employee receives a call and determines that the caller is LEP, the call-taker shall inform the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to the appropriate customer service representative that may assist the caller.
- If no available and appropriate customer service representative is present, the call-taker will contact Language Line. Once a three-way call is established between the call-taker, the LEP caller, and the interpreter, the call-taker will follow the standard operating procedures used for the call center.
- MARTA personnel in the field in need of interpretation services will attempt to identify the LEP individual's primary language using the language identification card. A sample section of this document is found below and the full document can be located at: <http://www.dol.gov/oasam/programs/crc/ISpeakCards.pdf>.
- Once the language is identified, personnel in the field will contact their supervisor who will contact Customer Care Center who will either use bilingual Customer Care Representative or call the Language Line for interpretation services.
- MARTA personnel are expected to follow the general procedures outlined in this plan; however difficult circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual MARTA personnel.
- In other than difficult circumstance, MARTA personnel should only use family, friends, or bystanders for interpreting in very informal, non-confrontational contexts and only to obtain basic information at the request of the LEP individual. Using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. Barring difficult circumstance, MARTA personnel should not use minor children to provide interpreter services.

## **LEP Service Goals**

To meet the needs of the substantial and growing LEP population in the MARTA service area, MARTA will employ the following additional strategies and actions over the next three years:

- Continue to provide ongoing written notifications in the following languages (Spanish, Chinese, Korean, and Vietnamese) as a standard practice.
- Add Chinese, Korean, and Vietnamese language options to the MARTA Breeze Card machines as part of the future system upgrades.
- Adopt standard operating procedures (SOPs) to be used by all MARTA front-line employees and contractors when encountering a LEP customer. The SOP may differ depending on the mode of transportation.
- Purchase language translation software to more efficiently provide translation of written documents
- Expand and enhance the written translation services available on MARTA's website to add Vietnamese. Currently, all of the major spoken languages are included with the exception of Vietnamese.
- Develop new I-Speak Cards to include phrases and symbols to enhance communication between LEP populations and front-line personnel who encounter LEP populations.
- Continue to distribute MARTA multilingual materials, such as the MARTA Riders Guide, bilingual bus schedules, and "How to Ride MARTA" to community organizations that assist the LEP population.
- MARTA will continue to take reasonable steps to develop in-house language resource bank in the Customer Service Center by hiring personnel with specific language skills.
- MARTA will continue its efforts to recruit and hire bilingual front-line employees by participating in community job fairs and advertising in publications and media that reach diverse populations.
- Conduct at least one Multi-Cultural Focus Group obtain information on the needs of the LEP community
- Consider increased use of pictographs or other symbols throughout the MARTA

system to convey messages on how to safely use MARTA.

- Continue to provide frontline staff training and supervisory training on MARTA LEP policies and procedures. Enhance current mandatory training in customer service and diversity awareness to include cultural sensitivity to LEP persons.
- In order to monitor the future translation service needs for LEP populations, MARTA will continue to track expenditures related to providing language assistance in the future.
- Based on the historical usage, changing demographics and projected costs, MARTA will continue to set aside budgetary dollars in order to meet compliance goals and fulfill the provisions of the LEP Plan. Such budgetary dollars shall include resources for: general ongoing translation services, interpreter services, signage, the translation of vital agency documents and other services as needed to ensure full inclusion for LEP populations. The Office of D&I will be provided with an annual fiscal LEP budget and have the primary role in facilitating the distribution of resources for LEP groups.

It is the responsibility of the Office of D&I to ensure that on an ongoing basis, whether new documents, programs, services and activities need to be made accessible for LEP individuals and provide notice to the LEP public and to employees of any changes in programs or services. In addition, D&I will consider whether changes in demographics, types of services, or other needs require annual re-evaluation of MARTA's Language Assistance Plan. D&I will evaluate MARTA's Language Assistance Plan by seeking feedback from the community and assess potential plan modification based on:

- Current LEP population in service area or population encountered or affected.
- Frequency of encounters with LEP language groups.
- Nature and importance of activities to LEP persons.
- Availability of resources, including technological advances, additional resources, and the cost imposed.
- Whether identified sources for assistance are still available and viable.

## **X. Staff Roles and Responsibilities**

### **A. Departmental and Executive Management Team Roles and Responsibilities**

In collaboration with the Office of D&I, MARTA departmental directors and managers:

1. Developed written procedures where needed, to ensure consistent service delivery.
2. Oriented new employees as to compliance with LEP requirements.
3. Evaluated their business units to determine and document the frequency and nature of public contact from LEP populations.
4. Reported LEP-related data annually to the Office of D&I.

The Executive Management Team shall:

1. Be responsible for overall LEP compliance requirements in their respective business units.
2. Ensure their respective business units determine and document the frequency and nature of public contact from LEP populations.
3. Evaluated current practices to determine what opportunities exist for improved services to LEP populations.
4. Communicate any systemic-wide concerns in relation to LEP populations to D&I resolution.

The EMT will also provide D&I with ongoing support and feedback on how to expand access and inclusion for LEP populations. In addition, the EMT will support and authorize mandated training for managers, supervisors, and front-line staff. After each LEP Plan update, the D&I Executive Director will provide the EMT with a briefing of the current LEP Plan and receive feedback.

### **B. The Office of Diversity and Inclusion (D&I)**

Office of D&I will be the primary point of contact for MARTA

This office has the following specific responsibilities:

1. In coordination with Title VI/LEP Committee, and department managers, determine the most appropriate level and type of language assistance to provide.
2. In conjunction with the training department, provide training and technical assistance in understanding and implementing LEP requirements and assisting in developing departmental procedures to ensure compliance.

3. Provide assistance in evaluating local population demographics to determine compliance requirements.
4. Collect LEP-related data for Federal reporting purposes.
5. Respond to and investigate all complaints of discrimination based on disability or national origin as they relate to language assistance.
6. Maintain MARTA's Limited English Proficiency (LEP) policy and keeping it current and relevant.
7. Overseeing, along with development of the translations and printing of critical forms into languages most often and significantly encountered in MARTA.
8. Working along with departments and offices and with the Office of Information Technology, to ensure that the agency's electronic systems include alerts and information on the client's language needs.

### C. Departments with Public Engagement Responsibilities:

The Executive Director of the office of D&I has selected MARTA personnel to evaluate and monitor LEP services performed by MARTA. One of the major goals is to ensure that LEP individuals can meaningfully access services and benefits offered by MARTA. MARTA's Office of D&I, chose individuals from the following MARTA departments: Human Resources, Planning, Communication and External Affairs, Marketing, Customer Service, the Law Department, Operations, Mobility Services, Police Services, and Safety Department. The responsibilities of these departments include reporting to the agency regarding the activities noted below:

- **Study LEP Service** - Obtain concrete data regarding LEP service through a comprehensive analysis of the service provided by MARTA. (Factors to be reviewed are outlined below.)
- **Identify Critical Insufficiencies** - Inform MARTA of any deficiency in LEP service which precludes meaningful access by LEP individuals to the programs administered by MARTA. Such notification is required to assure appropriate consideration in preparation of annual budget submissions.
- **Evaluate Suggested Improvements** - Review suggestions for improvement to LEP service and determine whether implementation is practical, economical, and consistent with the mission of MARTA.
- **Implement Economical Suggestions** - Monitor the implementation of suggested improvements which can be accomplished at a nominal cost to MARTA.

- **Prioritize Suggested Improvements** - Prioritize those suggestions which cannot be implemented at a nominal cost to MARTA. Consideration should be given to the number or proportion of LEP individuals who will benefit from the suggested improvement, the cost to MARTA, and whether the change can be implemented in a manner consistent with, and without unduly burdening, the fundamental mission of MARTA.

## **XI. TRAINING STAFF**

The Office of D&I will ensure that employees are knowledgeable about MARTA's obligations to provide meaningful access to information and services for LEP persons. Therefore, D&I will ensure that employees having contact with the public have experience in the following areas (see attached Title VI/LEP Training:

- Procedures for accessing language assistance
- Resources available to determine the language needs of a customer
- Resources available to ensure that access is provided in a timely and effective manner
- Working effectively with language interpreters
- Available documents that have been translated into languages other than English
- Types of language services available
- How staff can obtain those services
- How to respond to LEP callers
- How to respond to written communication from LEP persons

The Office of D&I will also disseminate the LEP policies and procedures to all employees likely to have contact with LEP customers. D&I will work with community organizations that are competent and experienced in such training and who are known to MARTA. D&I will introduce new employees to LEP policies and procedures by placing a LEP fact sheet in the new employee orientation packet.

### ***Sub-recipient Monitoring and Training***

MARTA provided assistance and monitored its sub-recipients to ensure the inclusion of LEP populations. When MARTA conducted site visits with sub-recipients, verification was made that inclusive services were provided to LEP populations without regard to race, color, or national origin. Oversight included the documentation of methods used by the sub-recipients including the following items:

1. A statement that the agency operated programs without regard to race, color, or national origin.
2. A description of the procedures that members of the public followed in order to request additional information on the sub-recipient's nondiscrimination and LEP obligations.
3. A written policy that described how the public could file a discrimination complaint and how the sub-recipients would distribute this to the public.

Based on the MARTA screening process of sub-recipients, MARTA is not aware of any complaints against sub-recipients since the last LEP Plan was submitted in 2014. To ensure ongoing compliance, MARTA has heightened its efforts to increase sub-recipient tracking and monitoring and provided technical assistance by:

- Formalizing the MARTA policies and procedures for monitoring sub-recipients to ensure that services are being provided to LEP populations
- Developing an initial and quarterly checklist to ensure and monitor sub-recipient compliance with LEP requirements
- Requiring all sub-recipients to attend mandatory comprehensive compliance training on providing services for LEP populations

## **XI. LEP Plan Distribution**

The LEP Plan objectives and requirements will be:

1. Distributed to all MARTA supervisors who have direct contact with the public.
2. Available in the Office of D&I.
3. Posted on MARTA's website, [www.itsmarta.com](http://www.itsmarta.com).
4. Distributed to sub-grant recipients.
5. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.

## **XII. Monitoring and Updating the LEP Plan**

MARTA will monitor its language assistance program annually to assess the following:

The current LEP makeup of its service area, the current communication needs of LEP applicants and customers, whether existing assistance is meeting the needs of such persons, whether staff is knowledgeable about policies and procedures and how to implement them, and whether sources of and arrangements for assistance are still current and viable. It is MARTA's intent to continually evaluate effectiveness and based on the results, make modifications where necessary.

## **XIII. Compliance and Reporting**

Overall, each MARTA employee is responsible for ensuring that meaningful services to LEP persons are provided in their respective departments/offices. This LEP Plan must be incorporated by reference into the appropriate departmental procedure manuals in order to ensure that employees are aware of their obligations for compliance.

The D&I Office Title VI Equity Administrator will monitor MARTA's programs to ensure LEP requirements are fulfilled and report annually on the accomplishments related to LEP activities to the Executive Director of the Office of D&I.

In monitoring compliance, an assessment will be made of whether MARTA's procedures allow LEP persons to overcome language barriers and participate in a meaningful way in the program activities and services. The program area's appropriate use of methods and options detailed in this LEP Plan will demonstrate their intent to comply with LEP requirements.

## **XIV. How Is A Discrimination Complaint Filed?**

Because LEP persons can file a complaint on the basis of national origin, D&I staff are trained on how to properly handle a Title VI complaint. According to MARTA's policy:

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color or national origin may by himself or by a representative, file a written complaint with MARTA within 180 days after the date of the alleged discrimination at: MARTA's Office of D&I, 2424 Piedmont Road, NE, Atlanta, GA 30324, 404-848-5000 (voice). Failure to file within 180 days may result in dismissal of the inquiry or complaint. In addition, any person who believed himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color or national origin, may by himself or by a representative, file a complaint with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination at: Federal Transit Administration (FTA) Office of Civil Rights Attention: Complaint Team East Building, 5th Floor – TCR 1200 New Jersey Avenue, SE



Washington, DC 20590

**The complaint should contain:**

- Name, address, telephone number, and signature of complainant.
- Facts and circumstances surrounding the claimed discrimination, including date of allegations, and basis of complaint (i.e., race, color, or national origin).
- Any names of persons, if known, that the investigator could contact for additional information to support or clarify the allegations.
- Corrective action being sought by the complainant.

**a. How Will A Complaint Be Resolved?**

Within five days of receiving a written complaint, MARTA’s D&I Office will acknowledge receipt of the complaint. The D&I Office will investigate and make recommendations for resolving the complaint as deemed appropriate.

**b. Prohibition Against Retaliation for Filing A Complaint**

Federal laws prohibit a recipient of federal funds from retaliating against any person who has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing. Any complaints of retaliation should be directed to MARTA’s Office of D&I immediately at; 2424 Piedmont Road, Atlanta, GA 30324.

**XV. Conclusion**

Providing meaningful access to LEP persons to MARTA’s programs, services, and activities is an important effort that will help enable MARTA to achieve its mission “to ensure equal access to transit and to promote transit excellence throughout MARTA’s service area.” As we work together, LEP persons will receive meaningful access to all MARTA’s programs and services.

By providing effective language assistance and overall inclusion to LEP persons, MARTA will help ensure that all persons will have access to transit services that are safe, reliable, convenient, and accessible. These efforts may attract riders who would otherwise be excluded from participating in transit services because of language barriers and encourage riders to continue using the system even if/or after they become proficient in English and/or have more transportation options.

Assisting LEP persons may also help increase and retain ridership among MARTA’s broader immigrant communities by reaching out to LEP populations in order to conduct a needs assessment and preparing ongoing future language implementation plans that will send a positive message to LEP persons that their business is valued. Additionally,

the interface with LEP populations can increase MARTA's potential for recruiting bilingual employees to better serve the needs of the community. As this LEP plan moves forward, the mutual benefits of inclusion will be gained by patrons, business partners, MARTA, and the general public at-large.