



ATL

**ATLANTA-REGION
TRANSIT LINK AUTHORITY**

TITLE VI PROGRAM

Board Approval Date: October 5, 2023

This page is intentionally left blank.

Contents

Section 1. General Requirements and Guidelines	7
A. Statement of Policy.....	7
B. Notice to Public.....	7
C. Title VI Complaint Procedures and Forms	7
D. Title VI Investigations, Complaints, and Lawsuits	7
i. Background	7
E. Public Participation Plan	8
F. Limited English Proficiency Access Plan.....	8
G. ATL Board Structure	8
H. Subrecipient Assistance and Monitoring	10
I. Determination of Site.....	10
J. Transit Facility Title VI Site Equity Analysis	10
K. ATL Title VI Program Adoption.....	10
Section 2. Requirements of Fixed Route Transit Providers	10
A. Service Standards and Policies.....	10
B. Demographics, Survey Data, and Service Profile Maps	10
C. Results of Monitoring.....	11
D. Public Engagement Process for Setting Title VI Policies	11
E. Service and Fare Equity Analysis Procedures.....	12
i. Service Equity Analysis for Major Service Changes.....	13
ii. Equity Analysis for Fare Changes	13
iii. Equity Analysis for Site or Location of Facilities.....	14
Appendix A – Notice to Public	15
Appendix B – Complaint Procedures and Complaint Form	17
Appendix C – Public Participation Plan	21
Appendix D – Limited English Proficiency Access Plan	33
Appendix E – Service Standards and Policies	39
Appendix F – Demographic Data Maps	44
Minority Populations	44
Low-Income Populations	46
Limited English Proficiency Populations	48
Appendix G – Ridership Demographics (Xpress Catchment Areas)	50

Available Survey Data 50

Calculated Catchment Areas..... 50

Catchment Area Demographics 51

 Race and Ethnicity..... 52

 Household Income 53

 Language Spoken at Home 54

Appendix H – Title VI Service Monitoring ATL Board Presentation, and meeting minutes 55

Appendix I – Equity Analysis Memorandums, Board Presentations, and Board Approvals 66

**RESOLUTION OF THE
ATLANTA-REGION TRANSIT LINK AUTHORITY
APPROVING TITLE VI PROGRAM UPDATES**

Resolution # 2023.10.05.03

WHEREAS, on March 7, 2019, pursuant to 49 CFR part 21, the Board of Directors (the "Board") of the Atlanta-region Transit Link Authority (the "ATL"), approved the adoption of the ATL Title VI Program and its submission to the Federal Transit Administration ("FTA"); and

WHEREAS, the Board previously approved an update to the ATL Title VI Program on October 1, 2020; and

WHEREAS, each recipient of FTA funds must adopt an updated Title VI Program every three years; and

WHEREAS, ATL seeks (i) to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner, (ii) to promote full and fair participation in public transportation decision-making without regard to race, color, or national origin, and (iii) to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

WHEREAS, an inclusive public participation process consistent with Federal and ATL policies was undertaken prior to Board consideration of the update to the Title VI Program; and

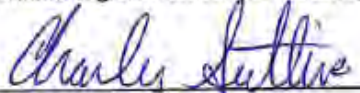
WHEREAS, updates to the Title VI Program must be considered and approved by the Board.

NOW, THEREFORE, BE IT RESOLVED that the Board approves the revisions to the ATL Title VI Program and approves submitting the updated Title VI Program to the FTA;

BE IT FURTHER RESOLVED that the revised ATL Title VI Program document is hereby incorporated by reference and a summary of the changes to the ATL Title VI Program be attached to this Resolution.

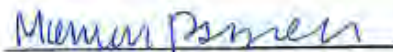
APPROVED this 5th day of October 2023.

Atlanta-region Transit Link Authority



Charlie Sutlive, Chairman

Attest:



Monica Rossell
Board Secretary

Approved as to form:



Merryl Mandus

Chief Legal Officer

Attachment to Resolution Approving Title VI Program Updates

Summary of ATL Title VI Program Updates

October 5, 2023

- Updated demographic data for ATL jurisdictional area; and
- Incorporated results of most recent service monitoring which was adopted by the ATL Board in October 2022; and
- Included fare and service change equity analyses completed since previous update; and
- Narrative updates for Public Participation Plan and Limited English Proficiency (LEP) Access Plan

Section 1. General Requirements and Guidelines

The Atlanta-region Transit Link Authority (ATL) is a Federal Transit Administration (FTA) grant recipient and has adopted this Title VI Program to ensure that its programs and projects are conducted in a nondiscriminatory manner. ATL's Title VI Program follows the requirements of FTA C 4702.1B, dated October 1, 2012, that requires all grantees to implement the general requirements and guidelines established in Chapter III of the Circular. The ATL assumed responsibility for the management of the Xpress Commuter Bus Service July 1, 2020.

A. Statement of Policy

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. ATL is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its program and activities on the basis of race, color, or national origin as protected by Title VI. It is ATL's policy that all subrecipients, contractors and subcontractors shall adopt Title VI policies and shall implement procedures to ensure that ATL's services are provided without discrimination on the basis of race, color, or national origin.

B. Notice to Public

ATL's *Statement of Policy* shall be published on the ATL website at <https://atltransit.ga.gov/>. A copy of the *Statement of Policy* is included in **Appendix A** of this document. The Title VI Notice to Public/*Statement of Policy* shall be distributed to the public in public areas of the ATL offices, transit vehicles, and offices of contracted transit service providers, if applicable. The Title VI Notice and Program Plan is distributed to ATL Board members.

C. Title VI Complaint Procedures and Forms

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

D. Title VI Investigations, Complaints, and Lawsuits

i. Background

In order to fulfill FTA's requirement to record and report transit-related Title VI investigations, complaints, and lawsuits, ATL prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA; and
- Lawsuits, and
- Complaints naming the recipient.

These investigations, complaints, and lawsuits are prepared, logged, and maintained by ATL's Title VI Coordinator.

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

E. Public Participation Plan

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

F. Limited English Proficiency Access Plan

ATL has developed its *Limited English Proficiency Access Plan* in compliance with Title VI, United States Department of Transportation's (USDOT) implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, August 11, 2000).

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

G. ATL Board Structure

The sixteen (16) ATL Board members consists of one individual appointed by the Governor, two individuals appointed by the Lieutenant Governor, two (2) individuals appointed by the Speaker of the House, and ten (10) individuals elected from the ATL's ten (10) transit districts (see O.C.G.A. § 50-39-4). There are no vacant seats as of October 2023.

Table 1: ATL Board Demographics

ATL Board Demographics			
2023 Board	Caucasian	African American	Total
Members	10	6	16
Percent	62.5%	37.5%	100%

The ATL Board members are appointed in the following manner, per the Official Code of Georgia Annotated (O.C.G.A.) 50-39-4:

"50-39-4. Membership; structure; operation; appointment of executive director; annual reporting.

(a)

(1) The board of directors of the authority shall consist of 16 members, ten of whom shall be appointed from the authority districts described in paragraph (2) of this subsection, five of whom shall be appointed as described in paragraph (3) of this subsection, and the commissioner of transportation who shall serve ex officio and be a nonvoting member. The members appointed from such authority districts shall be chosen by a majority vote of a caucus of the members of the House of Representatives and Senate whose respective districts include any portion of such authority district, the chairpersons of the county board of commissioners whose counties are located within such authority districts, and one mayor from the municipalities located within such authority districts who shall be chosen by a caucus of all mayors from the municipalities located within such authority districts; provided that if any authority district is wholly or partially located within the City of Atlanta, the mayor of the City of Atlanta shall be entitled to his or her own vote in addition to the vote by the mayor outside the limits of such city selected by the caucus of mayors to cast a vote. Each such appointee shall be a resident of the authority district which he or she represents and possess significant experience or expertise in a field that would be beneficial to the accomplishment of the function and purpose of this chapter. No later than December 1, 2018, the respective caucuses appointing board members from the authority districts shall meet and appoint their respective board members of said board of directors. A majority of eligible caucus members shall constitute a quorum for purposes of any meeting provided for in this Code section. Selection of an individual to serve as an appointee from an authority district shall be chosen by a majority vote of the quorum present at any meeting called in compliance with the notice requirements set forth in this Code section. Beginning in 2021, the respective caucuses appointing board members from the authority districts shall meet during the regular session of the General Assembly immediately preceding the expiration of the term of office of each member appointed by an authority

district. All such meetings shall be called by the chairperson of the authority and be held at the state capitol. Notice of such meeting shall be sent by email to all appointing members of any respective caucus at least seven calendar days prior and shall state the time, place, and purpose for such meeting. Voting shall be in person by secret ballot, and use of proxies, teleconference, or other technology where an appointing member is not physically present at such meeting shall be prohibited.

(2)

(A) *For purposes of appointing members of the board other than those members appointed pursuant to paragraph (3) of this subsection, there are hereby created ten authority districts, which shall be as described in the plan attached to and made part of this Act and further identified as “Plan: transit-dist-2018 Plan Type: Regional Administrator: H009 User: Gina.”*

(B) *When used in such attachment, the term “VTD” (voting tabulation district) shall mean and describe the same geographical boundaries as provided in the report of the Bureau of the Census for the United States decennial census of 2010 for the State of Georgia.*

(C) *The separate numeric designations in an authority district description which are underneath a VTD heading shall mean and describe individual blocks within a VTD as provided in the report of the Bureau of the Census for the United States decennial census of 2010 for the State of Georgia.*

(D) *Any part of the jurisdiction of the authority which is not included in any such authority district described in that attachment shall be included within that authority district contiguous to such part which contains the least population according to the United States decennial census of 2010 for the State of Georgia.*

(E) *Any part of the jurisdiction of the authority which is described in that attachment as being in a particular authority district shall nevertheless not be included within such authority district if such part is not contiguous to such authority district. Such noncontiguous part shall instead be included within that authority district contiguous to such part which contains the least population according to the United States decennial census of 2010 for the State of Georgia.*

(F) *Except as otherwise provided in the description of any authority district, whenever the description of such authority district refers to a named city, it shall mean the geographical boundaries of that city as shown on the census map for the United States decennial census of 2010 for the State of Georgia.*

(G) *The plan attached shall be reviewed by the Senate and House Transportation Committees after the report of the Bureau of the Census for the United States decennial census of 2020 or any future such census.*

(3) *The Lieutenant Governor and Speaker of the House of Representatives shall each appoint two board members. The Governor shall appoint one member who shall serve as the chairperson.*

(b) *All members of the board and their successors shall each be appointed for terms of four years, except that those members appointed from even-numbered authority districts shall serve an initial term that expires on April 15, 2023, and those members appointed from odd-numbered authority districts shall each serve an initial term that expires on April 15, 2021. After such initial term, that caucus which appointed such member for such initial term shall appoint successors thereto for terms of office of four years. All members of the board shall serve until the appointment and qualification of a successor except as otherwise provided in this Code section. Other than the commissioner of transportation, no person holding any other office of profit or trust under the state shall serve upon the board. The chairperson of the board of directors shall be appointed by the Governor, and a vice chairperson shall be selected annually from among the members by majority vote of those members present and voting.*

(c) *Vacancies in office of members appointed pursuant to paragraph (3) of subsection (a) of this Code section shall be filled in the same manner as original appointments. If a vacancy in office of a member appointed by an authority district pursuant to paragraph (1) of subsection (a) of this Code section occurs during any regular session of the General Assembly, the election for such vacancy shall be held in the same manner as provided in paragraph (1) of subsection (a) of this Code section. For all other vacancies in office of a member appointed by an authority district, the remainder of the unexpired term shall be filled by a member elected at a meeting called by the chairperson of the authority at a location designated by such chairperson, which shall be at the state capitol or a location within the authority district where such vacancy occurs. Notice of such meeting shall be sent by email to all appointing members of any respective caucus at least seven calendar days prior and shall state the time, place, and*

*purpose for such meeting. A person appointed to fill a vacancy shall serve for the unexpired term. No vacancy on the board shall impair the right of the quorum of the remaining members then in office to exercise all rights and perform all duties of the board."*¹

H. Subrecipient Assistance and Monitoring

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

The ATL currently has one subrecipient, Forsyth County.

I. Determination of Site

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

J. Transit Facility Title VI Site Equity Analysis

ATL's required procedures for performing a Transit Facility Title VI Site Equity Analysis are written and available in **Section 2.F**. At this time, ATL has not conducted any transit facility Title VI Site Equity Analysis reviews as required by FTA Circular 4702.1B.

K. ATL Title VI Program Adoption

The ATL's Board to adopted the ATL Title VI Program during their regularly scheduled meeting on October 5, 2023. ATL staff conducted a public comment period from September 1 through September 30, 2023, and two public hearings on September 20, 2023. The public hearings employed all current public health recommended guidelines for participants. Additional methods of providing public comment remained in place including email, phone, and mail.

There were no formal public comments submitted during the public comment period.

Section 2. Requirements of Fixed Route Transit Providers

A. Service Standards and Policies

ATL has established Xpress Service Standards and Policies (**Appendix E**) which establishes service standards pertaining to:

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

B. Demographics, Survey Data, and Service Profile Maps

As required by FTA Circular 4702.1B, Chapter IV, ATL has prepared demographic and service profile maps of the Xpress service area utilizing data from the 2020 Census. Copies of the maps based upon Xpress' current service and the demographic data from the 2020 Census are included in **Appendix F**. Table 2 provides a demographic summary comparing minority, low-income, and limited English

¹ [O.C.G.A. § 50-39-4](#)

proficiency (LEP) populations in the ATL 13-County Jurisdiction, a calculated systemwide Xpress ridership catchment area, and demographic information collected via Xpress customer surveys. Additional details regarding survey data, the catchment area methodology, and catchment area demographics are provided in **Appendix G**.

Table 2: Demographic and Service Profile Maps

Demographic and Service Profile Maps				
Demographic Category	ATL 13-County Jurisdiction	Xpress Catchment Area	2018 On-Board Survey	2022 Customer Satisfaction Survey*
Minority	59.8%	57.9%	70.7%	72.9%
Low Income	30.1%	30.0%	7.9%	18.2%
Limited English Proficiency (LEP)	7.7%	6.5%	1.4%	NA

* The 2022 Xpress Customer Satisfaction Survey was conducted online in Fall of 2022. Response rates for race/ethnicity and household income demographic questions were statistically valid at a systemwide level. LEP was not assessed in this survey. More details are provided in Appendix G.

As shown in Table 2, recent survey data show that Xpress tends to have a higher proportion of minority riders, a lower proportion of low-income riders, and a lower proportion of LEP riders, relative to the ATL 13-County Jurisdiction and the overall Xpress ridership catchment area. The Xpress catchment area, which can be interpreted as the geographic area from which Xpress riders are most likely to be attracted and served, has proportions of minority, low-income, and LEP populations that are consistent with the region as a whole.

C. Results of Monitoring

As required by FTA Circular 4702.1B, ATL will monitor the Xpress commuter bus service for Title VI compliance, once every three years, based on the *Service Standards and Policies*. ATL staff prepared a Title VI Service Standards Monitoring Report which was reviewed and approved by the ATL’s Board of Directors on October 6, 2022. The presentation and ATL Board meeting minutes are included in **Appendix H**. The next compliance monitoring report will be completed in or before 2025.

D. Public Engagement Process for Setting Title VI Policies

Prior to formal adoption by the ATL Board, ATL will conduct a 30-day public comment period that will begin on September 1 and end on September 30, 2023. Consistent with ATL’s Public Participation Plan, the following activities will take place:

- A. ATL will publish a draft ATL Title VI Program on the ATL and the Xpress web site.
- B. ATL staff will host two public hearings on September 20, 2023.
- C. Notices will be posted on Xpress buses announcing the public comment period, public hearing date and availability of the draft Title VI Program, related policies and definitions including major service change, fare change, disparate impact, and disproportionate burden.

- D. Advertise the public hearing in newspapers of general circulation at least five days prior to the public hearing. Newspapers include the Fulton County Daily Report, MundoNow, and others that provide coverage to the 13-county area.
- E. Additional options available to provide public comments include mail, email, and/or phone:
ATL Civil Rights Officer
Atlanta-region Transit Link Authority
245 Peachtree Center Ave., Suite 2200
Atlanta, GA 30303
TitleVI@atltransit.ga.gov
(404) 893-2100

The public comment period will end prior to the October 5, 2023, ATL Board of Directors meeting.

E. [Service and Fare Equity Analysis Procedures](#)

ATL has adopted Title VI Service Policies and Definitions including major service change, disparate impact, and disproportionate burden.

A **major service change** is defined as any route elimination, route addition, or service change of more than twenty-five percent of the revenue hours of operation for an individual ATL-operated Xpress route. Temporary changes in service lasting twelve months or less are exempt.

A Major Service Change **Disparate Impact** is defined as anytime the expected distribution of adverse effects to minority passengers is 15 percentage points more than the ATL-operated Xpress average minority passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey or an alternate method as appropriate. For a major service change that results in entirely new service, Census data will be used.

A Major Service Change **Disproportionate Burden** is defined as anytime the expected distribution of adverse effects to low-income passengers is 3 percentage points more than the ATL-operated Xpress average low-income passenger distribution. The impact on passengers will be measured using system ridership from the most recent on-board customer survey or an alternate method as appropriate. For a major service change that results in entirely new service, Census data will be used.

The effects of any **fare change** will be considered **disparate and/or disproportionate** if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership.

ATL will conduct a Title VI service equity analysis for all Xpress fare changes and major service changes. Prior to implementation of a fare or major service change, ATL will evaluate such changes to determine whether they will have a discriminatory impact based on race, color, or national origin. Although low-income populations are not a protected class under Title VI, ATL will also evaluate changes to determine whether fare or major service changes create a disproportionate burden on low-income populations.

If ATL finds that a fare or major service change results in a disparate impact to minorities or a disproportionate burden on low-income individuals, ATL will seek to avoid, minimize, or mitigate such impact and reanalyze the impacts of newly proposed changes. If ATL does not alter the proposed changes,

or, after revisions finds that minority and/or low-income populations continue to bear disproportionate adverse effects, ATL will implement the changes only if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no feasible alternatives that would have a less disparate/disproportionate impact on minority and/or low-income riders but would still accomplish ATL's legitimate program goals.

The ATL Board is responsible for approving Xpress fare and major service changes and will consider the evaluation of disparate impacts and disproportionate burdens and mitigation plans prior to approving fare changes or major service changes.

Since the adoption of the previous Title VI Program on October 1, 2020, the ATL has conducted four separate equity analyses. The Memorandums, Presentations, and Board Resolutions showing each approval from the ATL's Board of Directors may be found in **Appendix I**.

i. [Service Equity Analysis for Major Service Changes](#)

For ATL operated Xpress major service changes, effects are measured in projected annual ridership. An **Adverse Effect** is a negative change in ridership while a **Beneficial Effect** is a positive change in ridership. When evaluating service changes, ATL recognizes that the elimination or addition of an ATL operated Xpress route, rather than a change in headways, presents a greater degree of impact, and will consider such differences in degrees when planning and evaluating service changes.

Title VI guidance requires that ATL develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). The definitions from Section F above are used to determine when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations.

ii. [Equity Analysis for Fare Changes](#)

For ATL operated Xpress fare changes, adverse effects are measured in the change in the average fare paid by minority and low-income communities. ATL will determine whether there are disparate impacts on minority riders and/or disproportionate burdens posed on low-income riders by analyzing the distribution of burden on the Title VI protected groups and the overall ridership. ATL will determine the distribution of impacts by:

- Determining the number and percent of users of each fare media being changed across three user groups: overall ridership, minority riders, and low-income riders.
- Reviewing fares for each user group before and after the proposed change focusing on average cost per trip.
- Determining the percentage increase or decrease in average cost per trip for each of the three user groups due to the proposed fare change.

The effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs by more than 5 percentage points from the percent change for the overall ridership. Data used in the above analysis will come from the most recent on-board customer survey or an alternate method as appropriate. ATL will use the results of the above analysis to avoid, minimize or mitigate the impact of fare media changes on minority and low-income populations.

iii. Equity Analysis for Site or Location of Facilities

For any potential facilities, the ATL will follow federal guidance provided in Title 49 CFR Section 21.9(b)(3) and Appendix C, Section (3)(iv). Early during the planning stage the ATL will ensure that the proposed location is selected without regard to race, color, or national origin. ATL will engage in outreach to persons potentially impacted by the siting of any potential operating and maintenance facility.

A Title VI site equity analysis will compare equity impacts of multiple siting alternatives, and the analysis will occur before the selection of the preferred site.

When evaluating potential locations for new facilities, the ATL will assess potential impacts at alternative site locations to identify potential adverse impacts. Analysis will be completed at the Census tract or block group, as appropriate to ensure that proper perspective is given to localized impacts.

If the ATL determines that the selected location of a new facility will result in a disparate impact on the basis of race, color, or national origin, the ATL will only locate the project in that location if there is a substantial legitimate justification, and there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The ATL will demonstrate both disparate impact and disproportionate burden tests are met; and demonstrate that the ATL considered and analyzed alternatives to determine whether potential alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then selected the least discriminatory alternative.

Appendix A – Notice to Public

THE ATLANTA-REGION TRANSIT LINK AUTHORITY

TITLE VI

Statement of Policy

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

The Atlanta-region Transit Link Authority (ATL) and the Xpress commuter service is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin, as protected by Title VI.

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

Filing a Discrimination Complaint

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, or national origin may file a Title VI complaint. Complaints may be filed directly to ATL or to the Federal Funding Agency (address included on complaint form). In order to file a complaint, the complainant must complete a complaint form and submit the form to the ATL and/or the Federal Funding Agency. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainant's name, address, and telephone number or other means by which the complainant can be contacted. The Title VI Complaint form may be requested from the ATL website at atltransit.ga.gov/accessibility-and-civil-rights/, contacting the ATL Title VI line at (404) 893-2100 or in person from the ATL office at 245 Peachtree Center Ave., Suite 2200, Atlanta, GA 30303. The completed form should be returned to the address shown below via email, mail, or in-person delivery.

For more information on the ATL's civil rights program or to obtain a Complaint form, please visit <https://atltransit.ga.gov/accessibility-and-civil-rights/>, <https://xpressga.com/>, or contact the ATL Title VI line at (404) 893-2100. Complaints should be filed in writing to the following:

ATL Civil Rights Officer
Atlanta-region Transit Link Authority
245 Peachtree Center Ave., Suite 2200
Atlanta, GA 30303

TitleVI@atltransit.ga.gov

(404) 893-2100

OR

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

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

如果需要一种语言的信息，请联系 (404) 893-2100.

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

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

Appendix B – Complaint Procedures and Complaint Form

Title VI Complaint Procedures

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

1. Any person who believes that they have been subjected to discrimination may file a written complaint with the Atlanta-region Transit Link Authority (ATL) Civil Rights Officer. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.
2. The complainant may download the complaint form at <https://atltransit.ga.gov/accessibility-civil-rights/>, or <https://xpressga.com/> or request the complaint form from ATL’s Civil Rights Officer. The complainant may also submit a written statement that contains all of the information identified in Section 3 a through f.
3. The complaint must include the following information:
 - a. Name, address, and telephone number of the complainant.
 - b. The basis of the complaint, i.e., race, color, or national origin.
 - c. The date or dates on which the alleged discriminatory event or events occurred.
 - d. The nature of the incident that led the complainant to feel discrimination was a factor.
 - e. Names, addresses, and telephone numbers of persons who may have knowledge of the event.
 - f. Other agencies or courts where complaint may have been filed and a contact name.
 - g. Complainant's signature and date.
 - h. If the complainant is unable to write a complaint, ATL Civil Rights Officer will assist the complainant. If requested by complainant, the Civil Rights Officer will provide a language or sign interpreter.
 - i. The complaint may be emailed or mailed to the following address:

ATL Civil Rights Officer
Atlanta-region Transit Link Authority.
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
TitleVI@atltransit.ga.gov

OR

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

The ATL Civil Rights Officer must acknowledge receipt of an emailed complaint within one working day of receiving it. The complainant should contact ATL's Civil Rights Officer if an acknowledgment was not received within this time period to confirm whether ATL's Civil Rights Officer received the complaint.

- j. Complainants have the right to complain directly to the appropriate federal agency however, they must do so within one-hundred eighty (180) calendar days of the last alleged incident.
4. The ATL Civil Rights Officer will begin an investigation within fifteen (15) working days of receipt of a complaint.
5. The ATL Civil Rights Officer will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed, to investigate the complaint. If the complainant fails to provide the requested information in a timely manner the ATL Civil Rights Officer may administratively close the complaint.
6. The ATL Civil Rights Officer will complete the investigation within ninety (90) days of receipt of the completed complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings, and recommendations for disposition.
7. A closing letter and exit interview will be provided to the complainant. The respondent will also receive a copy of the closing letter. Each will have five (5) working days from receipt of the report to respond. If either party responds negatively or has additional information to provide, an informal meeting will be arranged by the Civil Rights Officer. If neither party responds, the complaint will be closed.
8. The investigation report with recommendations and corrective actions taken will be forwarded to the appropriate federal agency, the complainant, and the respondent.
9. The ATL Civil Rights Officer will advise complainants of their appeal rights to the appropriate federal agency.
10. The ATL prepares and maintains a list of active investigations with information related to the date, summary of the allegation(s), the status and actions taken by the recipient or subrecipient in response to the complaint.

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

如果需要一种语言的信息 · 请联系 (404) 893-2100.

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

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

Title VI Complaint Form

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

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

ATL Civil Rights Officer
Atlanta-region Transit Link Authority
245 Peachtree Center Ave NE, Suite 2200
Atlanta, GA 30303
Phone: (404) 893-2100
TitleVI@atltransit.ga.gov

OR

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

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

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

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

- Race/Color
 National Origin

7. Date(s) of incident resulting in discrimination: _____
8. Describe the discrimination. What happened, where, and who was responsible? For additional space, attach additional sheets of paper or use back of form.
9. Did you file this complaint with another federal, state, or local agency, or with a federal or state court? (Check appropriate space) Yes No

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

Federal Agency _____ Federal Court _____ State Agency _____
State Court _____ Local Agency _____ Other _____

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

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Were there any witnesses? [] Yes [] No

If yes, please provide contact information:

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____

Date Filed: _____

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

Complainant

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

如果需要一种语言的信息, 请联系 (404) 893-2100.

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

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

Appendix C – Public Participation Plan

Atlanta-region Transit Link Authority Public Involvement/Public Participation Plan

The Atlanta-region Transit Link Authority (ATL) is a Federal Transit Administration (FTA) grant recipient, and this Public Participation Plan has been adopted by the ATL Board. The ATL is an Authority established by state law and its Board members are appointed by the Governor, Lieutenant Governor, Speaker of the House, or elected by one of the ten transit districts included within the 13 county ATL jurisdiction.

I. Goals and Guiding Principles

The Atlanta-region Transit Link Authority (ATL) is strongly committed to seeking and encouraging public participation in the planning process. The overall goal of the ATL Public Participation Plan is to establish a framework for achieving mutual understanding of project issues among all concerned stakeholders involved and impacted by the relevant project or program change and to effectively engage minority, low-income, and limited English proficient populations in the public decision-making process. ATL engages in public outreach to ensure that its stakeholders receive information regarding the status of relevant project or program changes and participate in the decision making and planning process.

Members of Limited English Proficiency (LEP) populations in particular are served through the use of translated documents when requested, website translation services, interpretation services available by calling (404) 893-2100 and by the availability of interpretation services where otherwise applicable.

II. Federal Requirements

Federal Transit Administration regulations require inclusive public participation in transportation decision making. These requirements are contained in multiple circulars that apply to ATL's role as a direct recipient:

- FTA C 4702.1B, **Title VI Requirements and Guidelines for Federal Transit Administration Recipients**,
 - Chapter 3, paragraph 8, **Promoting Inclusive Public Participation**
 - Chapter 2, paragraph 9, **Requirement to Provide Meaningful Access to LEP Persons**.
- FTA C 4703.1, **Environmental Justice Policy Guidance for Federal Transit Administration Recipients**.
- 49 U.S.C. Sections 5307(b) which requires programs of projects to be developed with public participation.
- Executive Order 13166, **“Improving Access to Services for Persons with Limited English Proficiency”** (65 FR 50121, Aug. 11, 2000), which requires that recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

This ATL Public Participation Plan is intended to document ATL's activities to meet these federal requirements.

III. Public Participation Plan Goals

ATL endeavors to provide meaningful opportunities for the public to assist staff in identifying social, economic, and environmental impacts of proposed transportation decisions. This includes input from low-income, minority and LEP populations, through the public participation methods identified in Section VI.

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

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

IV. DEFINITIONS

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

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

Low-income person means a person whose annual household income is at or below ATL's locally developed threshold of \$45,000. FTA recipients are encouraged to use a locally developed threshold, such as the example definition found in 49 U.S.C. 5302 as amended by the Infrastructure Investment and Jobs Act (IIJA). Per the IIJA, a low-income person "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines. The ATL's locally developed threshold of \$45,000 corresponds with 150% of the 2023 HHS poverty guidelines for a family of 4.

Minority persons means the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

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

V. Population Demographics

A. Minority Populations

Using the United States Census Redistricting Data (2020), ATL has determined that 59.8% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 3 shows the proportion of minority/non-minority for each county in the 13-county area.

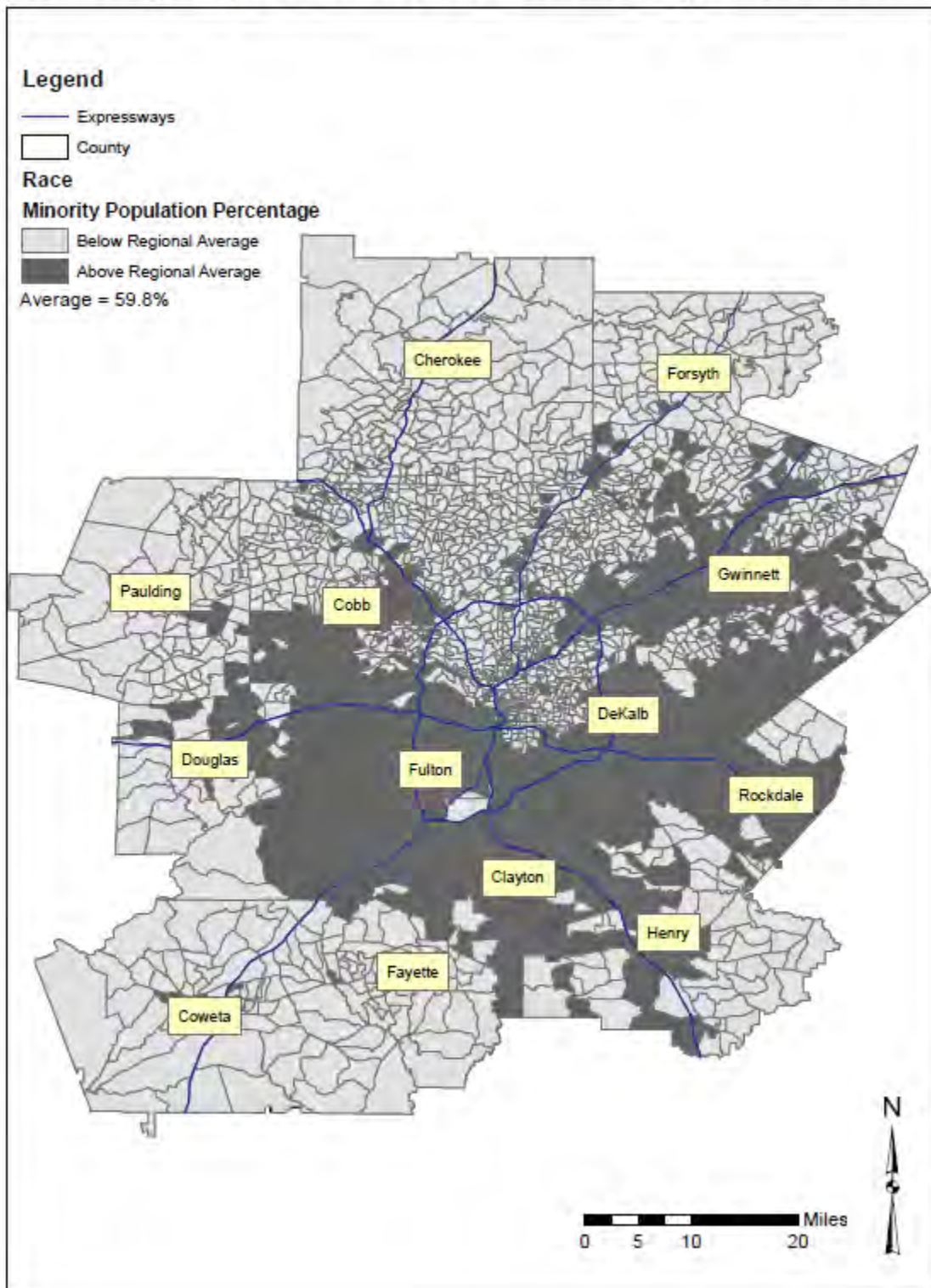
Table 3: Minority Population by County in ATL 13-County Area

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

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

Figure 1: Minority Population in ATL 13-County Jurisdiction

Minority Population in ATL 13-County Jurisdiction



B. Low-Income Populations

Table 4 presents the low-income population by county within the ATL 13-county jurisdiction.

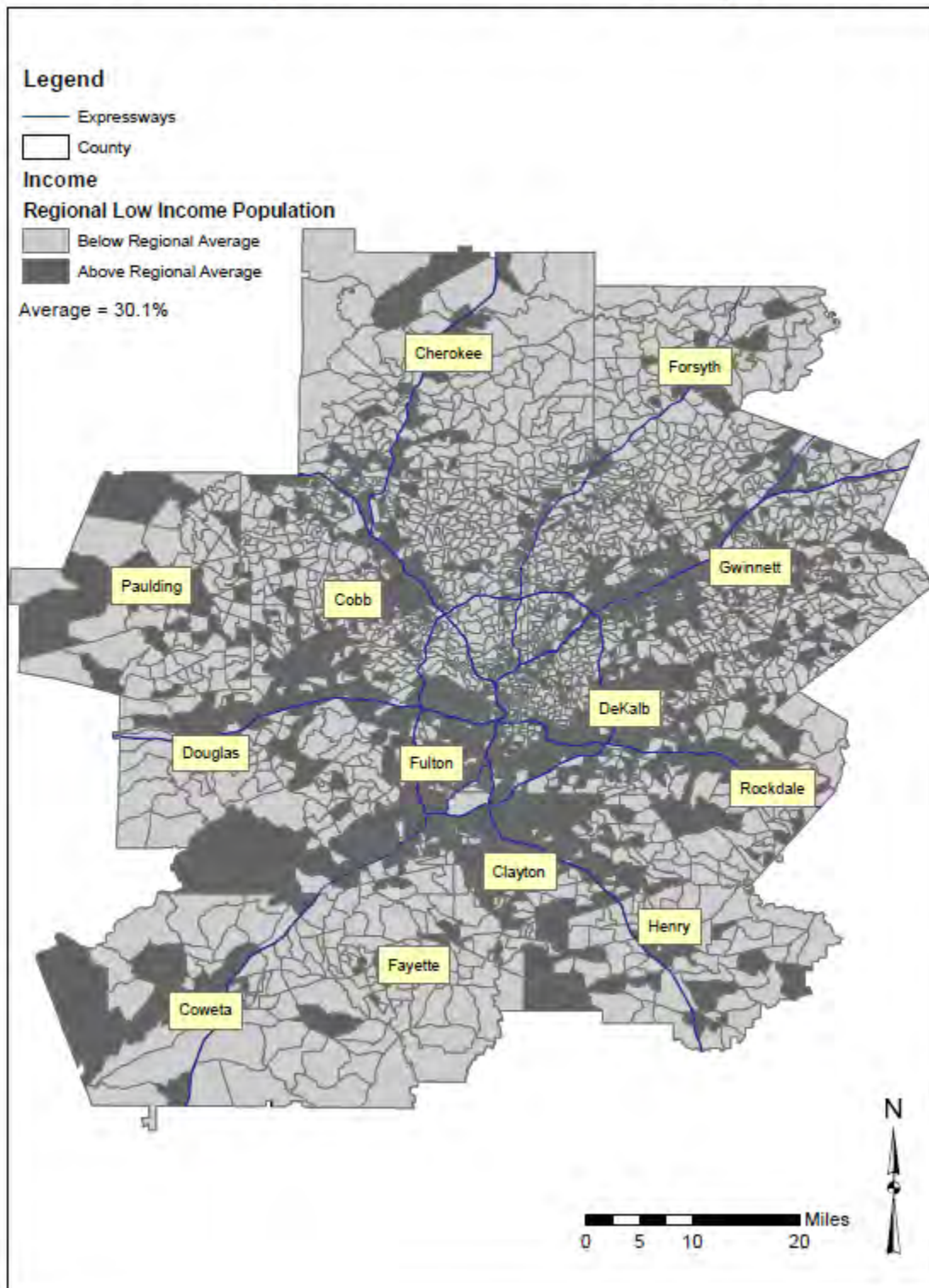
Table 4: Low-Income Population by County in ATL 13-County Jurisdiction

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

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

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

Low Income Population in ATL 13-County Jurisdiction



C. Limited English Proficient Populations

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

According to the ACS, of the total population over the age of five in the 13-county area (4,833,579):

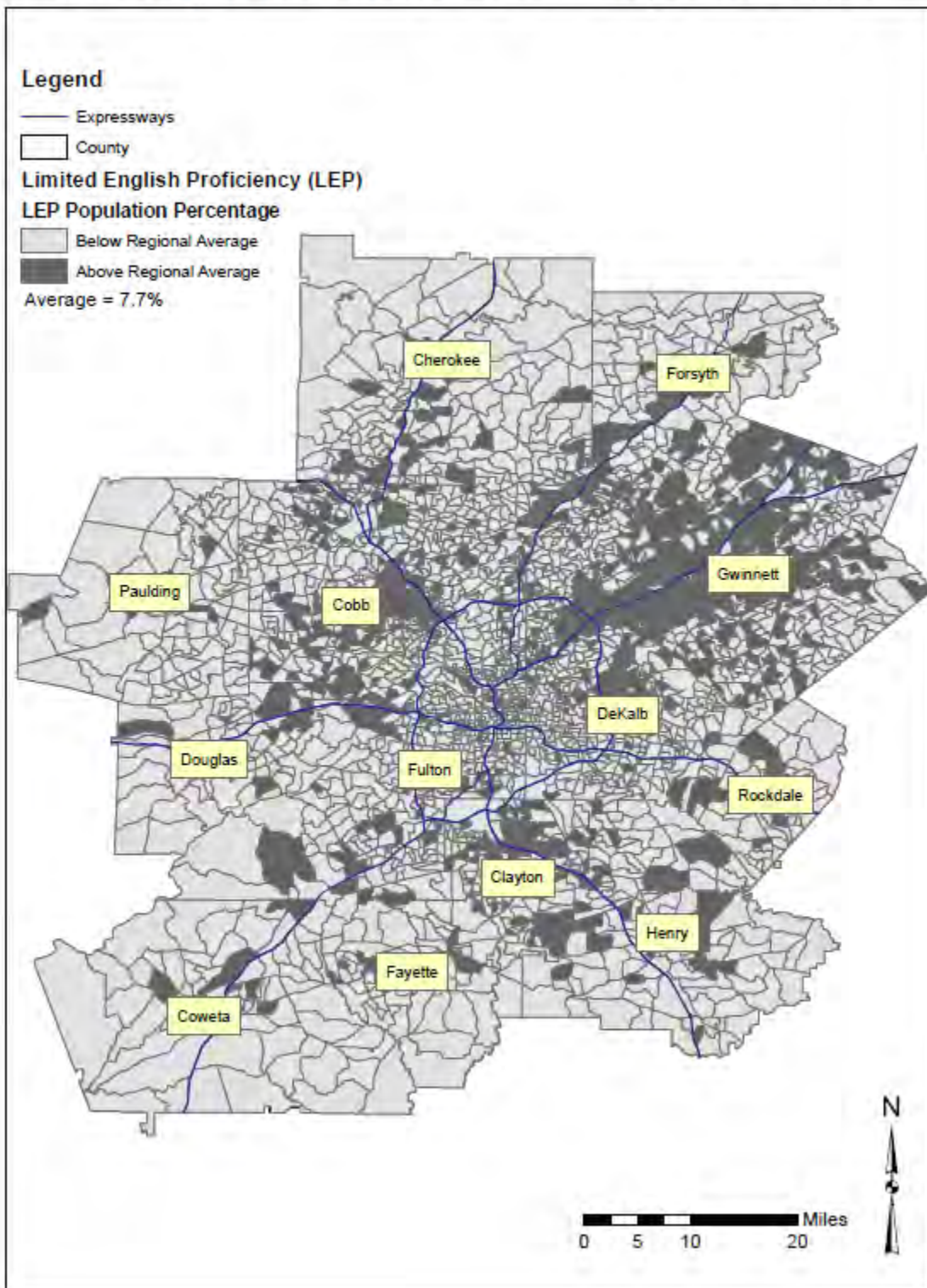
- Approximately 19.8% (955,694) speak a language other than English at home; and
- Approximately 7.7% (370,969) speak English less than “very well”

Table 5: LEP Population by County in ATL 13-County Jurisdiction

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

Figure 3: LEP Population by County in ATL 13-County Area

LEP Population in ATL 13-County Jurisdiction



VI. Public Participation Methods

ATL strives to proactively promote public involvement and to inform the public of current initiatives, programs, and issues. The following are examples that ATL may use to inform, reach out to invite participation, and to seek public input. It identifies how each example could best be used and is based on input collected from the community and staff experience. The examples are not listed in priority order.

- **Printed Materials Produced by ATL:** Outreach information can be publicized in printed materials produced by ATL.
- **ATL Website:** The ATL website, <https://www.atltransit.ga.gov>, is a communications tool providing substantial information about ATL policies, strategies, plans, and methods. The ATL website provides the option to translate web pages into multiple languages.
- **Xpress Website:** The Xpress website, <https://xpressga.com/> is a communications tool providing substantial information about Xpress services, schedules, and policies. The Xpress website provides the option to translate web pages into multiple languages.
- **Media Targeted to Ethnic Communities:** Participation opportunities are publicized through newspaper publications serving primarily English and Spanish speaking audiences. ATL also publicizes in other ethnic community media outlets when applicable.
- **Informational Public Meetings:** ATL conducts several different types of informational public meetings. Meetings are designed to engage the public to provide input, testimony, or comments regarding proposed projects, policies, and plan changes. Venues for meetings should be fully accessible for persons with disabilities and are generally located in areas served by public transit. It is typical to conduct a series of meetings on a single topic. ATL considers the best areas or communities to conduct meetings and hearings by first examining the topic and/or the issues that may affect riders and communities. ATL secures meeting venues with consideration to time of day, length of time required for the meetings, transportation options, and the number of expected attendees.
 - **Meeting Formats**
 - **Informational Open House:** This format provides opportunities for participants to receive information at their own pace by visiting a series of information stations that may include tabletop displays, maps, Power Point presentations, photographs, visualizations, and other tools. Participants have the opportunity for one-on-one conversations with the appropriate staff. Occasionally open houses include a short educational presentation followed by a discussion period for comments and questions and answers. Participants are often given comment forms to provide written comments. Staff is available to take verbal comments and transcribe them to provide a written record.
 - **Public Hearings:** Public hearings are conducted to obtain formal comments for the public record. They are typically conducted with a hearing officer and as applicable a court reporter who will transcribe any public comments. When no court reporter is present, meetings are recorded.
 - **Virtual Open House/Public Hearings:** Due to unforeseen circumstances such as the COVID-19 health emergency and various mandated restrictions that may be

enacted within the ATL jurisdictional boundaries due to these circumstances, open houses and/or public hearings may be presented in virtual format. Virtual meetings are to provide opportunities commensurate with in-person meetings to the extent practical and attainable. Formal comments are recorded as part of the virtual meeting forums.

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

- **Translation and Interpretive Services** – ATL works with translation services to translate written public information into other languages as needed. Prearranged onsite language interpretation service is provided upon request at public meetings and hearings.
- **Other Partner Agency Events** – ATL participates in and attends partner agency meetings that may include the above-mentioned communication methods to provide public involvement activities relevant to the ATL’s functions. An example of this is the Atlanta region Metropolitan Planning Organization’s (MPO) extensive public involvement and outreach for the Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP).

VII. PROGRAM/ACTIVITY SPECIFIC PUBLIC PARTICIPATION PROCESS

A. Overview

Using the regulations and guidance provided in federal and state law, staff uses the principles and guidance set out in this document to carry out public involvement activities that will ensure inclusive public participation in the decision-making process.

B. Methodology

Staff evaluates the program, policy, or other activity for which public involvement is either required or desirable to determine the most appropriate methods for achieving inclusive public participation in the decision-making process. Staff is not limited to only those specific activities, and within the resource limits of the ATL, uses the best practices for engaging the public.

C. Public Participation Process for modifications to Title VI Policies and Definitions.

When considering changes to Title VI policies and definitions, ATL provides an opportunity for public participation by conducting a 30-day public comment period and one public hearing, at a minimum.

- **30-Day Public Comment Process:**

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

1. Post notices to inform the public on the ATL website. The notices will be placed prior to, and for the duration of, the 30-day public comment period

and will announce the proposed changes, public comment period, and public hearing date(s).

2. Advertise the public hearing(s) in a newspaper(s) of general circulation and via other print, video, or electronic media as deemed appropriate by the ATL Office of Communications and Engagement, or designee. Advertisements will appear no fewer than two weeks prior to the date of the public hearing.
3. Comments received outside of the 30-day public comment period may be considered in the decision-making process or may be reserved for consideration in future revisions of the policy addressed by the comment.
4. Following the completion of the 30-day public comment period, staff will prepare a public comment summary for consideration by the ATL Board.

- **Public Hearing:**

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

1. An information period to allow staff to explain the nature of the changes in service, detailing the reasoning behind the proposal to the public.
2. Opportunity for public comment that allows members of the general public an opportunity to express their views.
3. A court reporter, if determined as applicable, will be present to record comments from members of the public who prefer to provide direct, oral comments. When no court reporter is present, meetings are recorded. The recording serves as the official public record.
4. Public hearings will be of public record and open to all members of the public. All public hearings must be recorded and transcripts available to the public upon request.

Public hearings are typically held within the 30-day public comment period but may begin before the period formally starts and extend after the period has ended; so long as the last hearing is held prior to the day in which the ATL Board is scheduled to address the issues under review.

- **Special Needs:**

Public hearings and meetings will be held in an ADA accessible facility and in areas served by public transit, if possible. Hearing materials, publications, and explanations in alternative formats will be provided upon request. Braille publications for the visually impaired will be provided upon request, given a two-week notice. All requests for alternative formats for hearing materials and publications should be submitted to the Office of Communications and Engagement, Atlanta-region Transit Link Authority at ATL's headquarters address as listed on its website in writing at least 4 working days prior to the hearing date.

D. ATL Oversight of Contractors and Subrecipients

The ATL will monitor subrecipients, contractors and subcontractors for compliance with Title VI per FTA Circular 4702.1B, Chap. III, Part 12 requirements.

Accordingly, the Office of Communication and Engagement, the Civil Rights Officer, and the Compliance Officer shall be responsible for monitoring and observing the public involvements activities of and maintaining the records necessary for documenting that all ATL subrecipients are conducting compliant public involvement activities, to include, if applicable, if making significant changes in transit programs, services or fares. ATL's subrecipient monitoring procedures, if applicable, include the following:

1. Request and maintain files for subrecipient Title VI programs.
2. Annual review of subrecipient/contractor Title VI programs to determine compliance with FTA requirements.
3. Develop a corrective action plan to address any deficiencies and assist as applicable to achieve compliance as required by FTA C. 4702.1B Chapter III 12.
4. Conduct on-site reviews to ensure compliance with program implementation activities including, but not limited to the completion of required equity analysis, the posting of policy and training.

Appendix D – Limited English Proficiency Access Plan

I. Introduction

The Atlanta-region Transit Link Authority (ATL) has developed its Limited English Proficiency (LEP) Plan to be consistent with Title VI of the Civil Rights Act of 1964, USDOT’s guidance “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (70 FR 74087, December 14, 2005), and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, August 11, 2000). In developing the LEP Access Plan, ATL has taken reasonable steps to ensure individuals who are limited-English proficient (LEP) have meaningful access to benefits, services, information, and other important portions of its programs and activities.

ATL’s LEP Access Plan consists of two main components. The first component is the Four Factor Analysis that ATL has used to determine its key affected LEP communities. The second component is an Access Plan which addresses how the authority is to provide services to LEP individuals, train employees, and monitor and update the program.

II. Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Program

The United States Department of Transportation (USDOT) guidance outlines four factors recipients should apply to the various kinds of contact they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

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

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of USDOT’s guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on service providers and local governments.

III. The Four Factor Analysis

This LEP Plan is based on the Four Factor Analysis outlined below. Each of the following factors is examined to determine the level and extent of language assistance measures required to ensure meaningful access to ATL activities by LEP persons.

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

For the ATL, the primary opportunities for direct interaction with the public occur at public meetings, community outreach activities, attendance at events with partner transit agencies and during the delivery of the Xpress commuter bus services. ATL's six major functions are as follows:

- Regional transit governance
- Development and maintaining of a Regional Transit Plan
- Creation, implementation, and communication of a unified regional transit brand
- Operations, maintenance, planning and delivery of the Xpress commuter bus service
- Administration and monitoring of regional federal and state transit funding
- Interaction and coordination with existing transit operators

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

The ATL has multiple opportunities for contact with the public. With the transition of management responsibility for the Xpress Commuter Bus Service July 1, 2020, the likelihood of direct contact with underserved populations such as the limited-English proficient community increased. In addition, the ATL as the oversight agency for regional planning and funding, interacts with partner agencies that may have frequent direct contact with underserved populations such as the limited-English proficient community.

The population data provided by the American Community Survey helps the ATL understand which languages other than English are predominantly spoken in the 13-county area and can inform future decisions to foster and improve engagement with LEP populations.

Based on the 2020 Census, approximately eight percent of the residents of the 13-county ATL jurisdiction age 5 or older speak English less than "very well." Table 6 evaluates the LEP population according to the primary language spoken at home, indicating that the LEP persons most likely to be encountered by ATL are those who speak Spanish (4.28% of the region's population), Vietnamese (0.57%), Chinese (0.45%) and Korean (0.40%).

Table 6 – Language Spoken at Home by Population 5 Years and Over that Speak English Less than Very Well

Language Spoken at Home by Population 5 Years and Over that Speak English Less than Very Well					
Language Spoken at Home (Other than English)	Population of 13-County Region that Speaks English:		Population of Language Speakers	Percent* of Language Speakers (Speak English Less than Very Well)	Percent* of Region Population (Speak English Less than Very Well)
	Very Well	Less than Very Well			
Spanish:	263,620	207,087	470,707	44.0%	4.3%
Other Indo-European languages:	84,884	34,145	119,029	28.7%	0.7%
Vietnamese:	16,660	27,305	43,965	62.1%	0.6%
Chinese (incl. Mandarin, Cantonese):	20,665	21,565	42,230	51.1%	0.4%
Korean:	18,959	19,514	38,473	50.7%	0.4%
Other and unspecified languages:	57,173	18,822	75,995	24.8%	0.4%
Other Asian and Pacific Island languages:	43,806	18,227	62,033	29.4%	0.4%
French, Haitian, or Cajun:	32,353	8,544	40,897	20.9%	0.2%
Russian, Polish, or other Slavic languages:	15,647	7,377	23,024	32.0%	0.2%
Arabic:	11,605	5,213	16,818	31.0%	0.1%
Tagalog (incl. Filipino):	5,900	1,859	7,759	24.0%	0.0%
German or other West Germanic languages:	13,453	1,311	14,764	8.9%	0.0%
All non-English languages	584,725	370,969	955,694	38.8%	7.7%

Source: ACS 2020, Table B16004: Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.
 Note: the margin of error for estimates of smaller sized populations are significant and therefore much less certain.
 *Total Population of the ATL 13-County jurisdiction is 4,833,579

Table 6 also tracks the percentage of each language group that speak English less than very well. Of the top four languages spoken at home that make up the largest LEP populations in the 13-county area, Vietnamese has the highest rate of limited English proficiency, 62.11%, followed by Chinese at 51.07%. This information further exemplifies the need for translation services for Vietnamese and Chinese speakers.

Factor 2: Frequency of Contact with LEP Individuals

Individuals are able to engage with the ATL in a variety of ways: via telephone with ATL staff and Xpress Customer Service Center staff, in-person at ATL Board meetings, public meetings, other agency events, community outreach events, through delivery of Xpress commuter bus service or through the ATL and Xpress websites. These primary points of contact are monitored by the ATL to estimate the frequency with which LEP persons come into contact with the Authority. Monitoring occurs via an evaluation of call data, operator feedback, website traffic, and attendance at publicly accessible meetings and activities.

The ATL and Xpress utilize Google Translate on the website to assist LEP persons. The ATL will track and record the number of page views to the ATL webpage, including the number of times the website is translated into a language other than English. This tracking will allow the ATL to monitor a webpage translation rate, comparing visits when the website was translated into a language other than English to the number of overall website visits each year.

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

The ATL’s key functions, referenced in the Factor 1 Section above, include activities for improving regional transit access and mobility in the Atlanta metropolitan area. The Xpress commuter bus service, one of the key functions, operates between suburban counties and major business districts. This service

is potentially of significant importance to the LEP community, particularly those who are transit-dependent and live or work in the markets served by Xpress. Because the ATL has a strong commitment to encouraging public involvement in regional transportation planning, funding, and governance decisions, it is important that resources are available to provide an inclusive environment. The LEP Access Plan is an integral part of achieving inclusiveness in the public participation process.

Factor 4: The Resources Available to ATL and Overall Cost

To assist LEP persons, ATL has resources available to provide information and translation assistance to LEP persons. These resources include Language Line translation services, public outreach, and staff training.

The ATL, pursuant to a Memorandum of understanding (MOU) with the State Road and Tollway Authority (SRTA), has access to various translation services. The total costs associated with ATL's LEP monitoring, and outreach efforts are estimated to be \$10,000 each year. These include the costs associated with Language Line translation services, placing public outreach notices in newspapers, providing printed translatable documents as needed and staff training. If needed, additional resources can be allocated to translation services.

Conclusion

The Four Factor Analysis outlined above indicates that ATL has opportunities for direct interaction with the Atlanta region's sizable LEP population. These opportunities to potentially impact many persons in the LEP community through ATL's role as the responsible agency for regional transit planning and oversight of federal/state transit funding could be significant. Therefore, ATL is committed to providing meaningful access to LEP individuals through ATL's LEP Access Plan.

IV. Limited English Proficiency Access Plan

Based on results from the Four Factor Analysis, the Limited English Proficiency (LEP) Access Plan outlines how ATL will provide language assistance services to notify LEP persons about the availability of language assistance services. Additionally, the analysis provides guidance for the ATL monitoring and update of the Access Plan.

To prepare the Access Plan, ATL has focused on the points of potential contact and interactions with LEP individuals and communities. The points of contact identified are by telephone (direct call to the Customer Service Center and/or ATL via contact information provided on website and outreach materials), email (via contact information provided online and outreach materials), in-person (onboard an Xpress commuter bus, at public meetings/hearings, during community outreach events, and at partner agency events), and via the ATL and Xpress websites. The appropriate type of LEP assistance varies depending on the interaction point.

1. Language Assistance Services by Interaction Point:

- **Telephone:** The ATL website and other distributed ATL information provide telephone contact information for key staff with resources to communicate with LEP individuals. These include:

- Designated staff have been trained to assist LEP individuals by connecting them with the Language Line interpretation service.
- ***In-Person:*** The primary types of in-person interactions are face-to-face encounters at ATL Board meetings, public meetings and hearings, community outreach and partner agency events, and with Xpress Commuter Bus staff during service delivery and outreach events. Regardless of the specific location, there are several ways in which ATL seeks to communicate with LEP individuals. These include:
 - The use of “I Speak” cards. These are available from staff at all public meetings/hearings and other events and on-board Xpress Commuter Buses. These cards allow the LEP individual to identify their spoken language. The staff member is then able to contact the Language Line interpretive services for assistance. In the event the LEP person is unable to identify their spoken language, the staff member will still contact Language Line services who will be able to assist in identifying the proper language.
 - The designated staff have access to the ATL website which provides translated materials via Google Translate for additional assistance in-person.
- ***Website:*** The website allows users to select the translation language which includes, but is not limited to Spanish, Vietnamese, Korean, and Chinese as they are the largest LEP populations in the region. The website may also be translated into alternative languages for LEP persons via Google Translate.

2. Plan to Notify LEP Persons of Language Assistance Availability

- ***Telephone:*** Designated staff will be trained to utilize the Language Line service to provide language assistance as necessary.
- ***In-Person:*** Staff representing ATL at public meetings/hearings and other events will have “I Speak” cards available and Language Line ready in event LEP assistance is required. Xpress Commuter Buses have “I Speak” cards available on board to assist customers. Staff will determine the type of assistance needed. If written documentation is requested, staff will follow up with the LEP person and provide appropriate written documentation free of charge, whether via printed copies or through advising the LEP person of the option to use Google Translate on the ATL and Xpress websites.
- ***Website:*** The ATL and Xpress websites each provide language assistance with the use of Google Translate. The websites provide fully translatable HTML text into a variety of languages, including but not limited to Spanish, Vietnamese, Korean, Chinese; the largest LEP populations in the region. Text on the website which is viewable via Google Translate directs LEP individuals to the ATL contact information so that additional assistance may be provided through Language Line.

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

ATL regularly evaluates the effectiveness of the LAP including:

- Staff will monitor the number of calls received, number of requests for Spanish assistance and the number of Spanish assistance requests that result in a transfer to a live operator.
- The Language Line interpretation service reports the number of calls directed to it by ATL. Additionally, this information specifically identifies the language requested by the caller.
- Staff maintains a telephone log of their contact with individuals and notes their interaction with LEP persons.
- Staff involved in outreach efforts keep a log of the type of language assistance requested.
- Staff track the frequency with which Google Translate is used, the language selected, and the type of information translated.

The above monitoring activities feed into each subsequent Four Factor Analysis and LEP Access Plan update. Each subsequent Four Factor Analysis serves to evaluate the current plan and to identify additional steps which may improve our internal efficiency while positively affecting the accessibility for LEP persons. This evaluation and update will occur at least once every three years.

4. Employee Training to Ensure Timely and Reasonable Language Assistance to LEP Populations

The Language Access Plan provides a convenient and responsive program which is capable of maintaining a high level of accessibility for stakeholders. To ensure the process works properly, it is imperative that staff members be trained to respond appropriately to their intended interaction point. As such, the following training techniques apply:

- All applicable staff (e.g., ATL contacts, public meeting/hearing representatives, outreach and affiliated agency representatives/attendees etc.) are provided with the LEP Access Plan and will be educated on procedures to follow.
- Training topics include:
 - Understanding the Title VI Program and LEP responsibilities;
 - Explanation of the language assistance services ATL offers, with a focus upon likely interaction types for each staff member;
 - How to use the LEP “I Speak” cards;
 - How to access translation services via the ATL website;
 - How to use the Language Line interpretation service;
 - Documenting language assistance requests; and
 - How to handle a Title VI and/or LEP complaint.

Any questions or comments regarding this plan should be directed to the ATL Title VI Officer.

ATL Civil Rights Officer
 Atlanta-region Transit Link Authority
 245 Peachtree Center Ave NE #2200
 Atlanta, GA 30303
 Phone: (404) 893-2100
 Email: TitleVI@atltransit.ga.gov

Appendix E – Service Standards and Policies

Xpress Service Standards & Policies

1.0 Overview

The Atlanta-region Transit Link Authority (ATL) provides Xpress commuter transit service which is provided from outlying Atlanta suburban areas at designated locations, such as park and ride facilities, to the central downtown Atlanta business district, MARTA rail stations and/or other key activity centers within the Atlanta metro region. The service operates with limited stops utilizing interstate highways and a network of high occupancy vehicle and high occupancy toll/express lanes. The operation of Xpress commuter transit service is typically limited to the commute travel times each weekday between 5:30 am and 10:30 am and between 1:00 pm and 7:45 pm.

The primary purpose for maintaining service standards is to guide ATL staff as to when service changes are necessary and ensure compliance with applicable federal guidelines. This document 1) sets ATL's Xpress service standards policies, 2) establishes a timeframe for monitoring them, 3) defines major service changes, and 4) establishes policies necessary to ensure Xpress service does not create disparate impacts on minority populations nor pose disproportionate burdens on low-income populations.

2.0 Definitions

- a) **Headway** – The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- b) **Frequency** – Number of buses per hour on a specified route calculated by dividing 60 minutes by the route headway. Twenty-minute headway translates into a frequency of three buses per hour ($60/20 = 3$).
- c) **Inbound/Outbound Service** – Indicates the direction of a route, usually from a centralized base location, such as a central business district, rail station, or transfer center. Xpress buses, for instance, operate inbound from suburban park and ride lots to a rail station or major employment center. Outbound service would indicate the opposite direction of service.
- d) **Vehicle Load Factor** – The ratio of customers on board a bus compared to the number of available seats. For example, if a bus offers 57 seats and there are 63 customers on board, the load factor would be 1.10. Load factors greater than 1.0 indicate that customers are standing.
- e) **Farebox Recovery Ratio** – Total revenue generated by the ridership on a specified route divided by the operating cost for that route.
- f) **ATL Operated Xpress Routes** – The Xpress routes that are paid for, and operated, by ATL.
- g) **Route** – The scheduled path traced by an Xpress bus with a number of specific stops over a consistent time frame.
- h) **Trip** – A single course of travel within a route.
- i) **Minority Route** – ATL operated Xpress routes that, according to the most recent on-board customer survey, have a percentage of minority riders that is at least 15 percentage points higher than the average concentration of minority riders on all ATL operated Xpress routes.

- j) **Peak Service** – Xpress service generally operated between 5:30am and 10:00am and between 1pm and 7:45pm.
- k) **Customers Per Trip** – The number of passengers on a trip.

3.0 Xpress Service Standards and Policies

This section sets service standards pertaining to:

- Trip and Route Productivity (Fare Box Recovery Ratio, Customers per Trip, Vehicle Load)
- Vehicle Headway
- On-Time Performance
- Service Availability
- Distribution of Transit Amenities
- Vehicle Assignment

In order to ensure compliance with Title VI regulations, ATL will monitor the performance of ATL operated Xpress routes relative to the above standards and policies at least once every three years.

1.) *Trip and Route Productivity Standards*

New ATL-operated Xpress routes take some time to attract ridership. General economic conditions, fuel costs, service design and the market for the service affect the amount of time required for a new service to achieve acceptable ridership levels. Service standards have been established by year of operation so that new and existing services can be monitored for adequate progress in meeting service productivity standards. Xpress standards for trip and route productivity are shown in Table 1:

Table 1: Xpress Trip and Route Productivity Standards

<i>Years of Operation</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Year 4 & Longer</i>
Minimum Fare Box Recovery Ratio	10%	15%	20%	25%
Minimum Customers per Trip	8	11	14	17

2.) *Trip and Route Productivity Improvement*

The service standards above describe the minimum standards that ATL will use to identify Xpress underperforming or unproductive service. Routes, route segments, or trips that are performing below at least one of the standards warrant comprehensive evaluation and corrective actions, and strategies that are intended to improve the productivity of specific service components may be pursued. Corrective measures may include the following:

- Increase marketing efforts or information dissemination
- Route redesign or segment rerouting
- Change the frequency of service
- Change the hours of service
- Eliminate unproductive/underutilized service, which may include an entire route, route segment or specific trips operated on a route

3.) *Maximum Vehicle Load*

Xpress commuter transit service typically relies upon travel at relatively high speeds. In order to maximize safety, standees should be avoided. Therefore, ATL has two standards related to maximum Xpress vehicle load:

- No Xpress trip will include more than 15 standees, in accordance with vehicle capacity limits. In the event the vehicle manufacturer's capacity limit only allows for less than 15 standees, the maximum vehicle load will default to the manufacturer's capacity limit.
- Service modifications will be considered for routes and trips where standing loads occur more often than once per week.

To ensure compliance with these standards, preserving safety and comfort, ATL will review Xpress route and trip load factors on an ongoing basis and adjust schedules up to twice per year to mitigate overcrowding.

4.) *Vehicle Headway*

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A consistently shorter headway corresponds to more frequent service. ATL's Xpress vehicle headway standard is related to vehicle load and trip productivity, which are indicators of market demand for the Xpress commuter service. Vehicle headways may vary by route and time of day, based on ridership demand that is driven largely by residential and workplace populations. Table 1 includes route and trip productivity standards, and ATL will assess productivity according to these standards up to twice per year. ATL will consider reducing Xpress headways for trips and/or routes that regularly have standing loads (seat capacity load factor greater than 1.0) more often than once per week. Of these trips and/or routes, ATL will reduce headways first on Xpress routes with the highest vehicle load factors and/or customers per trip. ATL will consider increasing Xpress headways for trips that fall below the minimum customers per trip standards shown in Table 1 and will increase headways first on trips and/or Xpress routes with the lowest customers per trip and/or farebox recovery ratios.

5.) *On-Time Performance*

On-time performance (OTP) is a measure of Xpress trips completed as scheduled. On-time is defined as a bus that departs a scheduled stop between zero and five minutes after the scheduled departure time. ATL's overall OTP goal for Xpress is for at least 85% of all trips to be on time. To achieve this goal, ATL has two Xpress OTP service standards:

- Zero Xpress trips shall depart early. In other words, the Xpress system shall achieve 0% of trips "running hot."
- At least 85% of Xpress trips shall depart less than 5 minutes after the scheduled departure time. In other words, there shall be no more than 15% late trips.

ATL will review available Xpress OTP data on an ongoing basis and adjust schedules up to twice per year.

6.) *Service Availability*

Service availability refers to the geographic distribution of Xpress service within the Xpress service area. Unlike with local transit service, the Xpress service model specializes in commute trips that are longer than 10 miles, with destinations at major employment centers in the metro Atlanta region. The Xpress service area includes 13 counties, however Xpress riders come from more than 40 counties. Many

customers use the service to decrease (but not eliminate) personal driving distance on their commutes. To serve as many potential riders as possible, ATL will:

- Operate at least one route on each major interstate corridor entering metro Atlanta: I-75 from the north and south, I-85 from the north and south, and I-20 from the east and west.
- Operate at least one route on each of the SRTA-operated managed lane systems in metro Atlanta. For calendar year 2020 this includes the managed lane systems along I-85 to the Northeast of metro Atlanta, the I-75 South system in Southwest metro Atlanta, and the Northwest Corridor system along I-75 in the Northwestern part of metro Atlanta.
- Analyze market conditions and financial feasibility to expand service at least once every 10 years. Identify opportunities to increase service on existing routes, and to add service connecting additional residential areas and/or additional job centers.

7.) *Distribution of Transit Amenities*

Transit amenities refer to items of comfort, convenience, and safety that are available to Xpress customers. ATL has three standards regarding transit amenities at Xpress park and ride lots, addressing three types of lots based on ownership:

- Newly constructed, state-owned Xpress stations shall have the same package of amenities with passenger pavilions, route and schedule displays, benches, waste receptacles, ADA parking spaces, and an equipment room. The design of new and refurbished stations and amenities will follow the requirements outlined in the Xpress Station and Park & Ride Design Manual.
- For leased Xpress lots, the investment in amenities is limited by the very short-term nature of the lease agreements. Since ATL is required to protect the federal interest for the useful life of its Xpress assets, required construction at leased lots is limited to passenger shelters and ADA parking spaces. However, ATL will review other possible transit amenities options with landowners when negotiating lease agreements.
- Interagency lots are owned and controlled by other transit systems or units of local government. The decision on the design and placement of amenities at these locations is controlled by the property owner. ATL has no requirements for transit amenities at these lots, but ATL will review available transit amenities options with interagency partners.

As of the effective date of this Program, ATL has not built any escalators or elevators.

8.) *Vehicle Assignment*

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the Xpress system. As to vehicle assignment, ATL will:

- Rotate Xpress vehicles at each operating location among routes so that no route in the Xpress system receives vehicles that are on average more than three years older than the system average for all ATL-operated Xpress routes. For the purpose of assessing compliance with this standard, a vehicle that has been rehabilitated according to the Xpress Transit Asset Management (TAM) Plan is considered new. In other words, vehicle age for this standard shall be calculated based on the model year only for vehicles that have not been rehabilitated and based on the most recent rehabilitation year for those vehicles that have been rehabilitated.

- ATL may assign particular Xpress vehicle model types that are designed with accessibility options on particular routes in which there is higher demand for specific accessibility options. In this case, the assignment of vehicles with alternative accessibility features will only be based on the vehicle's age relative to the system-wide fleet and not based on vehicle layout.

Appendix F – Demographic Data Maps

Minority Populations

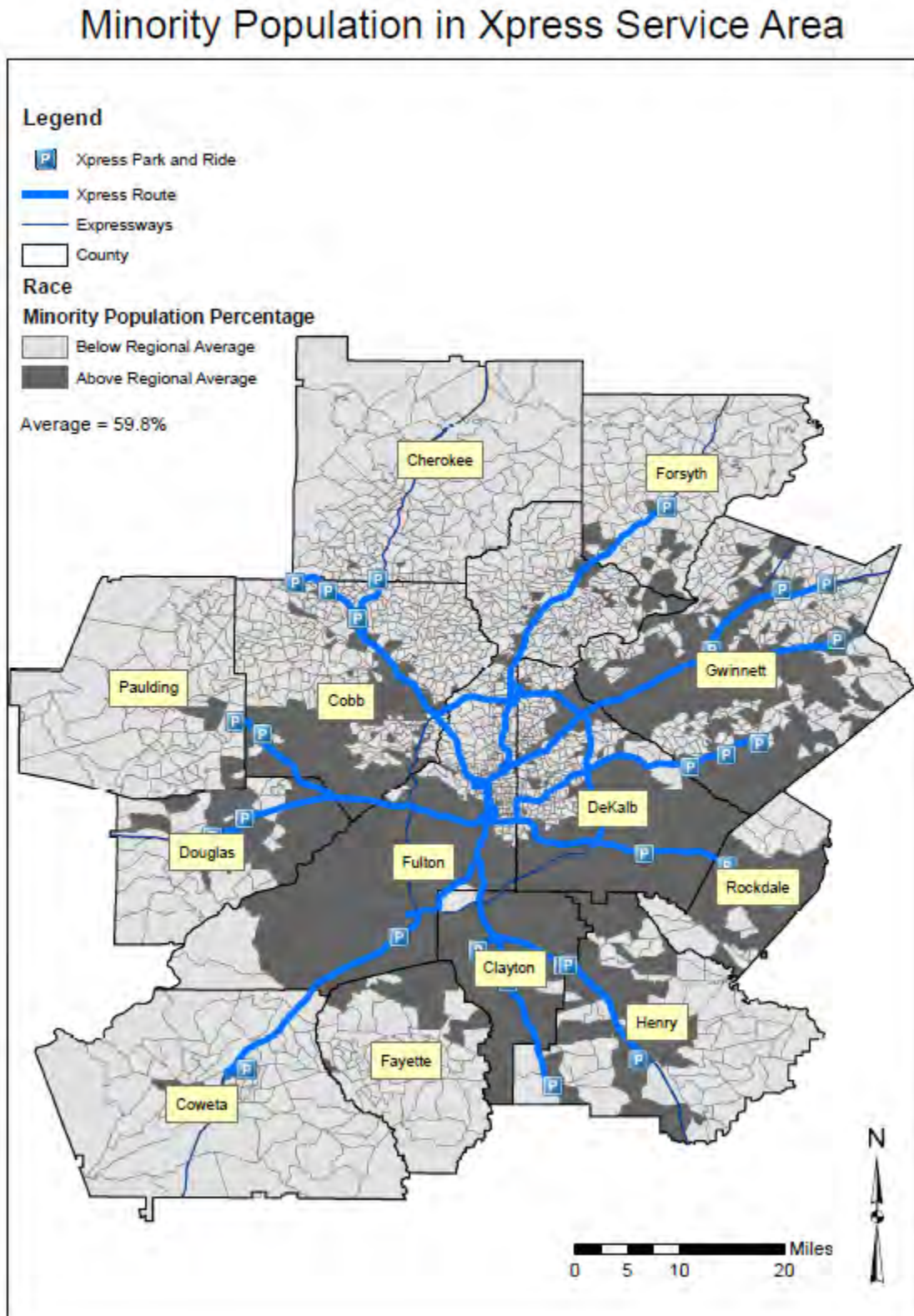
Using the 2020 Census Redistricting Data, ATL has determined that 59.8% of the population for all counties within the 13-county area are of a minority race/ethnicity. In this case, “minority” is defined as any individual not classified as white, non-Hispanic. Table 7 shows the proportion of minority/non-minority for each county in the 13-county area.

Table 7: Minority Population by County in Xpress Service Area

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

The following map depicts the census tracts in the 13-county area with a higher concentration of minority populations than the service area average as well as an overlay of the Xpress service. The map shows that minority populations are mainly concentrated in areas of Fulton, DeKalb, Clayton, Gwinnett, and Cobb Counties.

Figure 3: Minority Population in Xpress Service Area



Low-Income Populations

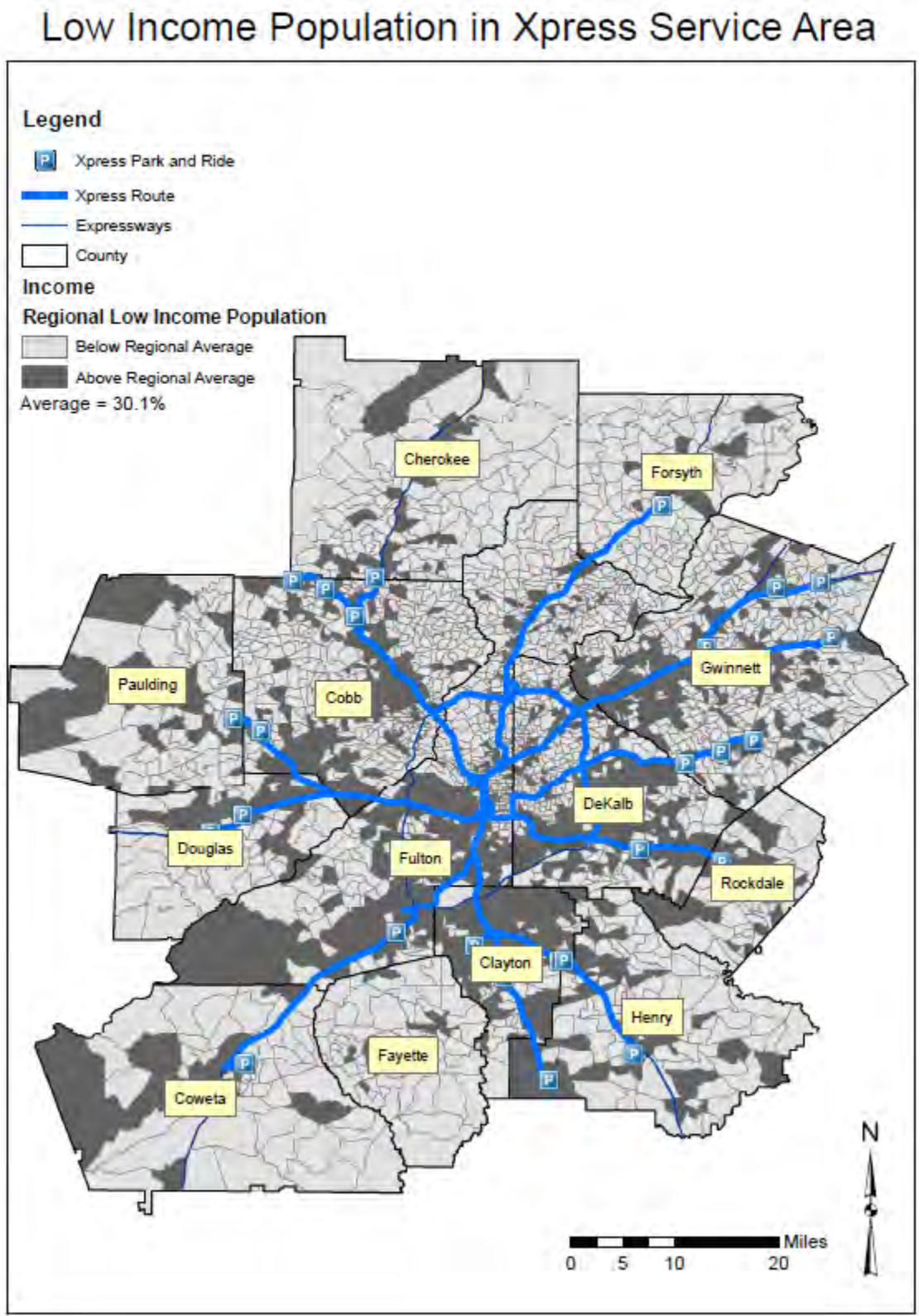
Table 8 presents the low-income population by county within the 13-county area.

Table 8: Low-Income Population by County in 13-County Xpress Service Area

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

The following map depicts areas with a higher concentration of low-income populations in the Xpress service area. Higher concentrations of low-income populations can be found in the central portion of the service area as well as portions of the outlying counties.

Figure 4: Low Income Population in Xpress Service Area



Limited English Proficiency Populations

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

According to the 2020 ACS, of the total population over the age of five in the 13-county area (4,833,579):

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

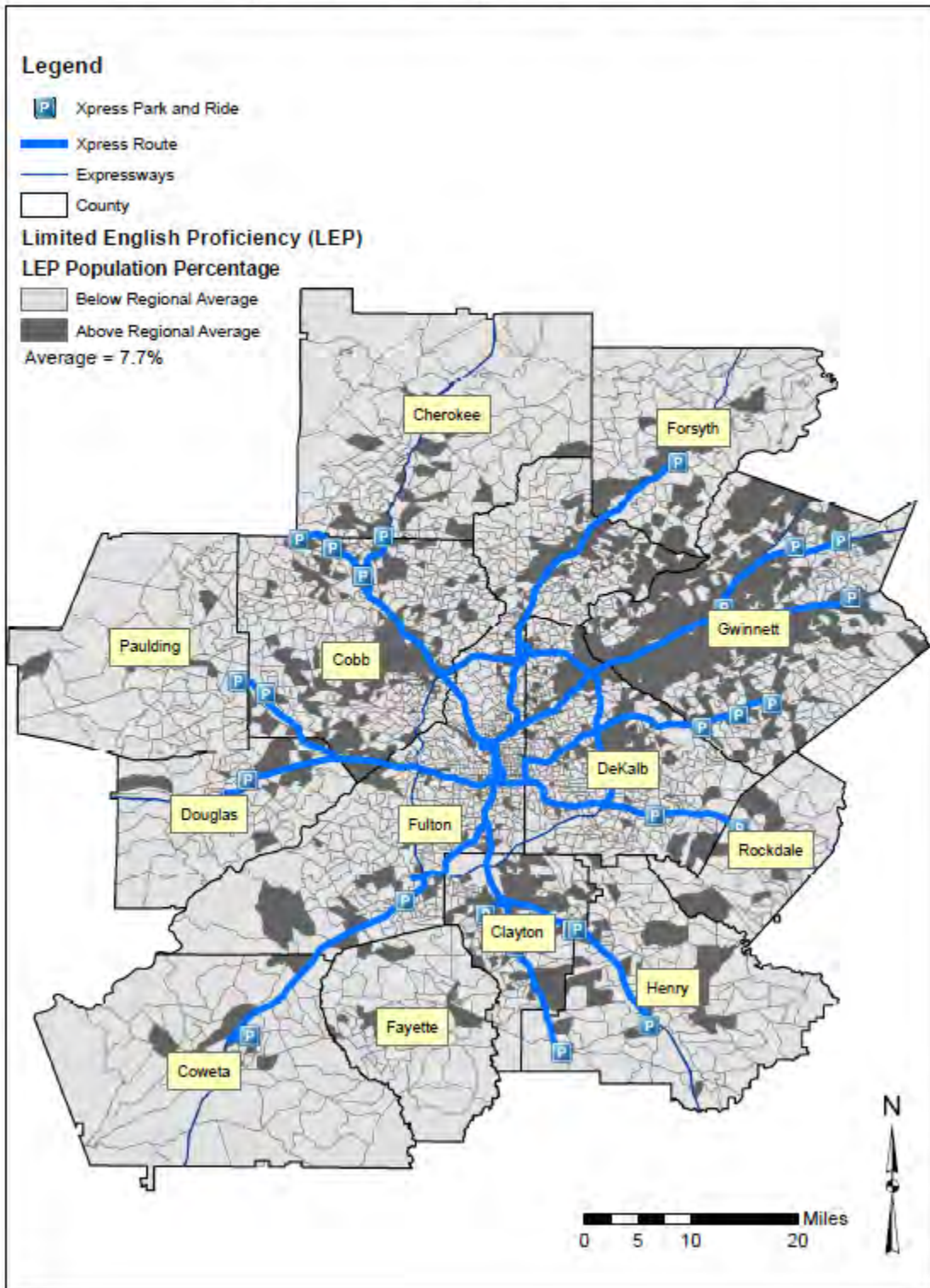
Table 9: LEP Population by County in Xpress Service Area

County	Total Population of Speaking Age (5 Years and Older)	LEP Population*	Percent LEP Population (%)
Cherokee County	238,875	11,768	4.9%
Clayton County	265,889	24,413	9.2%
Cobb County	710,233	49,527	7.0%
Coweta County	137,185	4,339	3.2%
DeKalb County	702,759	58,543	8.3%
Douglas County	136,211	6,480	4.8%
Fayette County	108,463	3,994	3.7%
Forsyth County	222,422	13,626	6.1%
Fulton County	990,461	49,465	5.0%
Gwinnett County	865,453	133,239	15.4%
Henry County	216,771	8,038	3.7%
Paulding County	153,915	2,823	1.8%
Rockdale County	84,942	4,714	5.6%
ATL 13-Counties Jurisdiction	4,833,579	370,969	7.7%

Source: American Community Survey 5-Year Estimates (2020), table B16004
 *LEP Population is defined as individuals who are 5 years or older where the language spoken at home is not English and English spoken “Less than very well.”

Figure 3: LEP Population by County in Service Area

LEP Population in Xpress Service Area



Appendix G – Ridership Demographics (Xpress Catchment Areas)

The demographic summaries presented in Tables G1-G3 in this appendix were calculated based on route catchment areas, developed using primarily the 2022 Xpress Customer Satisfaction Survey and demographic data from the 2020 U.S. Census and American Community Survey.

Available Survey Data

The last Xpress onboard survey (OBS) conducted by in-person surveyors was done in 2018, but Xpress ridership has changed dramatically in the subsequent five years. Xpress has conducted more recent customer surveys, in 2021 and 2022, which collected demographic and customer opinion information via an online survey link. While the 2021 survey was collected only through email links, the 2022 survey can be considered an OBS since riders were invited to respond while onboard Xpress. In 2022, QR code stickers were posted on the seat backs of Xpress coaches, and many respondents took the survey while onboard. However, there are limitations in the demographic data available from this survey because demographic-related questions were optional. Also, although questions regarding race/ethnicity, household income, and language spoken at home were included in the 2021 and 2022 survey instruments, limited English proficiency (LEP) was not assessed. Furthermore, while the 2022 survey, response rates for race/ethnicity and household income demographic questions were statistically valid at a systemwide level (see Table 2 in the main body of this Title VI Program update document), response rates varied dramatically when broken down by Xpress lot and route. A higher response rate, overall, was provided for the residential zip code, which could then be used in a catchment area analysis.

Calculated Catchment Areas

A catchment area is the geographic area from which a facility or location-based service attracts clients or customers. To support the 2022 Title VI Service Standards Monitoring effort (see Appendix H), Xpress catchment areas were first calculated around park and ride lots using geospatial information systems (GIS) analysis and the home zip code data collected through the 2018 OBS. At the time, the most recent (2021) survey represented such low (pandemic-period) ridership, that it was not deemed representative of 2022 riders, or of the potential riders who may soon be returning to Xpress as pandemic conditions subsided. By the time of this 2023 ATL Title VI Program update post-pandemic Xpress ridership growth appeared to have stabilized, and the sample of home zip codes collected through the most recent 2022 survey was deemed sufficient to calculate updated catchment areas for most park & ride lots. In a few cases where the 2022 sample size was too small for a particular lot, the 2018 zip codes were used as a proxy, with some adjustment to represent the smaller post-pandemic ridership.

Xpress park and ride catchment-areas have a distinctive shape to correspond with Xpress' current design as a directional, peak-period, park-and-ride-based commuter service. Potential Xpress customers are more likely to utilize a park and ride lot that is 'downstream' in the direction of travel between their home origin and the final destinations of their trips. They are less likely to drive a far distance 'upstream,' or away from their final destinations. As diagramed in Appendix H of this document, Xpress catchment areas are therefore designed to represent a larger area on the 'outer' side (farther away from the travel destination) of each park and ride lot, and a smaller area on the 'inner' side (closer to the destination). For the most recent update to lot-based catchment areas, both a distance-based weighting and a weighting by the number of survey respondents in each home zip code has been utilized to make sure that catchment areas represent the geographic area from which potential

customers are most likely to be attracted, and far-away outlier zip codes are excluded from the catchment areas for each lot.

Route-based catchment areas are calculated by using GIS to merge the lot-based catchment areas for all lots served by each route. A systemwide Xpress catchment area is calculated by merging all route-based catchment areas.

Catchment Area Demographics

Tables G1-G3 provide demographical summaries based on 2020 census data and ACS data for the resident populations within catchment areas for each Xpress route, and the Xpress system as a whole. These demographic summaries can be interpreted as representing the population of current and potential Xpress riders who are likely to be able to access the Xpress service. Table 2 in the main body of this Title VI Program update document indicates that the actual current Xpress ridership is likely to include a higher proportion than the catchment areas of minority riders, and a lower proportion of low-income riders.

Race and Ethnicity

Table G1 summarizes the race and ethnicity of census populations in each Xpress route catchment area. In the rightmost column, “minority” populations include all individuals except those identified as “white” alone.

Table G1: Race and Ethnicity by Route Catchment Area Population

Race and Ethnicity Proportions by Route Catchment Area Population									
Route	% Hispanic or Latino	% White	% Black or African American	% American Indian and Alaska Native	% Asian	% Native Hawaiian and Other Pacific Islander	% Other race	% Two or more races	% <i>Minority</i>
400	13.8%	64.2%	7.0%	0.2%	10.5%	0.0%	0.5%	3.8%	35.8%
401	13.8%	64.2%	7.0%	0.2%	10.5%	0.0%	0.5%	3.8%	35.8%
410	20.1%	35.2%	23.6%	0.2%	16.8%	0.0%	0.6%	3.5%	64.8%
411	16.8%	49.1%	20.4%	0.1%	9.1%	0.0%	0.6%	3.8%	50.9%
412	20.1%	35.2%	23.6%	0.2%	16.8%	0.0%	0.6%	3.5%	64.8%
413	16.8%	49.1%	20.4%	0.1%	9.1%	0.0%	0.6%	3.8%	50.9%
414	19.1%	40.8%	21.2%	0.2%	14.5%	0.0%	0.6%	3.6%	59.2%
416	16.6%	45.3%	28.6%	0.1%	4.7%	0.0%	0.7%	3.9%	54.7%
417	20.1%	35.2%	23.6%	0.2%	16.8%	0.0%	0.6%	3.5%	64.8%
419	15.9%	26.5%	44.3%	0.2%	8.8%	0.0%	0.7%	3.6%	73.5%
423	6.5%	19.1%	69.0%	0.2%	1.1%	0.1%	0.7%	3.4%	80.9%
426	6.5%	19.1%	69.0%	0.2%	1.1%	0.1%	0.7%	3.4%	80.9%
428	6.5%	19.1%	69.0%	0.2%	1.1%	0.1%	0.7%	3.4%	80.9%
430	7.2%	37.9%	47.2%	0.2%	2.9%	0.1%	0.7%	3.9%	62.1%
431	9.7%	23.3%	58.0%	0.2%	4.6%	0.1%	0.7%	3.5%	76.7%
432	9.3%	27.0%	55.0%	0.2%	4.2%	0.0%	0.7%	3.5%	73.0%
440	8.8%	28.1%	56.5%	0.2%	2.4%	0.0%	0.6%	3.3%	71.9%
441	10.4%	16.0%	66.6%	0.2%	3.0%	0.0%	0.7%	3.1%	84.0%
442	12.7%	17.3%	62.5%	0.2%	3.7%	0.0%	0.7%	2.9%	82.7%
453	6.6%	39.3%	47.8%	0.2%	2.2%	0.0%	0.5%	3.3%	60.7%
463	8.6%	49.1%	35.3%	0.2%	1.4%	0.0%	0.7%	4.5%	50.9%
476	12.0%	43.7%	37.8%	0.2%	1.5%	0.1%	0.7%	4.1%	56.3%
480	11.2%	64.0%	15.4%	0.2%	3.6%	0.0%	0.8%	4.8%	36.0%
483	11.4%	67.7%	11.4%	0.2%	3.9%	0.0%	0.7%	4.7%	32.3%
484	11.9%	61.2%	17.2%	0.2%	3.8%	0.0%	0.8%	4.9%	38.8%
485	11.9%	61.2%	17.2%	0.2%	3.8%	0.0%	0.8%	4.9%	38.8%
490	11.1%	72.1%	7.9%	0.2%	3.5%	0.0%	0.7%	4.6%	27.9%
System-wide	11.8%	42.1%	35.4%	0.2%	6.1%	0.0%	0.6%	3.8%	57.9%

Source: Census demographics applied to route catchment areas.

Household Income

Table G2 summarizes the household income levels of census populations in each Xpress route catchment area. In the rightmost column, “low-income” is defined as households earning less than \$45,000 per year.

Table G2: Household Income by Route Catchment Area

Household Income Proportions by Route Catchment Area								
Route	% Less than \$15,000	% \$15,000 to \$30,000	% \$30,000 to \$45,000	% \$45,000 to \$60,000	% \$60,000 to \$75,000	% \$75,000 to \$150,000	% Greater than \$150,000	% Low Income
400	5.1%	7.5%	8.8%	9.4%	8.9%	34.7%	25.7%	21.4%
401	5.1%	7.5%	8.8%	9.4%	8.9%	34.7%	25.7%	21.4%
410	6.4%	8.8%	11.0%	10.7%	10.4%	32.9%	19.8%	26.3%
411	5.8%	7.8%	9.7%	10.4%	10.4%	37.1%	18.9%	23.3%
412	6.4%	8.8%	11.0%	10.7%	10.4%	32.9%	19.8%	26.3%
413	5.8%	7.8%	9.7%	10.4%	10.4%	37.1%	18.9%	23.3%
414	6.3%	8.6%	10.7%	10.7%	10.3%	33.7%	19.7%	25.5%
416	6.3%	7.4%	10.6%	10.9%	13.3%	38.1%	13.6%	24.2%
417	6.4%	8.8%	11.0%	10.7%	10.4%	32.9%	19.8%	26.3%
419	6.4%	9.8%	11.7%	12.6%	11.1%	34.2%	14.3%	27.9%
423	8.6%	13.3%	14.5%	12.9%	12.1%	29.3%	9.2%	36.4%
426	8.6%	13.3%	14.5%	12.9%	12.1%	29.3%	9.2%	36.4%
428	8.6%	13.3%	14.5%	12.9%	12.1%	29.3%	9.2%	36.4%
430	5.7%	8.7%	11.2%	12.3%	13.5%	35.2%	13.5%	25.6%
431	6.4%	11.3%	13.8%	13.1%	13.4%	31.8%	10.1%	31.6%
432	6.3%	11.0%	13.6%	13.4%	13.2%	31.9%	10.5%	30.9%
440	9.5%	13.8%	13.4%	12.5%	13.0%	29.5%	8.4%	36.7%
441	8.0%	12.7%	12.2%	14.6%	12.9%	31.7%	8.0%	32.8%
442	8.9%	15.4%	14.8%	13.8%	11.5%	27.1%	8.5%	39.1%
453	9.1%	14.0%	14.2%	10.8%	9.9%	29.5%	12.5%	37.3%
463	7.3%	8.9%	11.6%	12.5%	12.3%	34.4%	13.0%	27.8%
476	6.2%	11.0%	13.7%	13.9%	11.4%	32.0%	11.9%	30.9%
480	6.6%	9.0%	10.7%	10.4%	10.1%	34.1%	19.1%	26.2%
483	5.7%	8.0%	9.8%	9.7%	9.3%	33.9%	23.5%	23.6%
484	6.4%	9.0%	10.5%	11.3%	9.4%	33.6%	19.9%	25.9%
485	6.4%	9.0%	10.5%	11.3%	9.4%	33.6%	19.9%	25.9%
490	5.3%	7.6%	9.4%	9.3%	9.0%	34.1%	25.4%	22.2%
Systemwide	7.1%	10.6%	12.3%	11.4%	10.7%	32.0%	15.9%	30.0%

Source: Census demographics applied to route catchment areas.

Language Spoken at Home

Table G3 summarizes the language spoken at home and the low-English-proficiency (LEP) proportion for ACS populations in each Xpress catchment area.

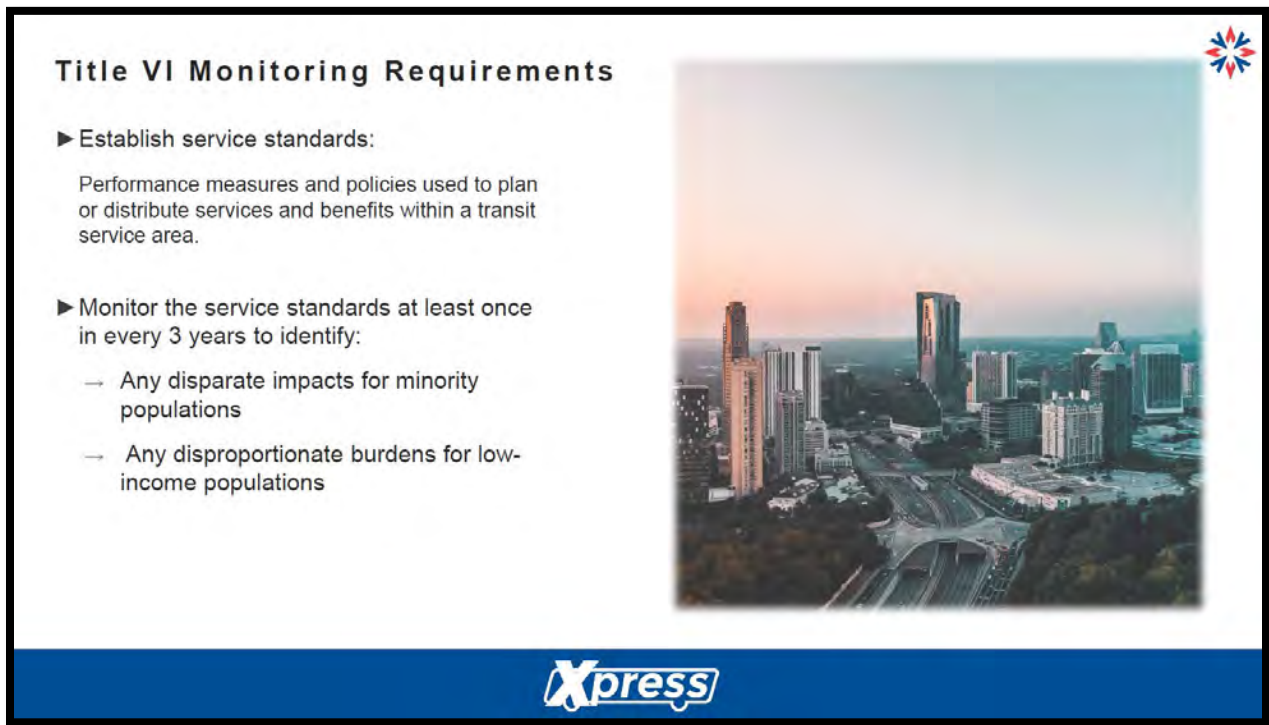
Table G3: Language Spoken at Home by Route Catchment Area

Language Spoken at Home by Route Catchment Area						
Route	% English	% Spanish	% Other Indo-European languages	% Asian and Pacific Island languages	% Other languages	% LEP
400	79.6%	10.4%	4.3%	4.8%	0.9%	7.1%
401	79.6%	10.4%	4.3%	4.8%	0.9%	7.1%
410	65.6%	16.5%	6.0%	9.5%	2.5%	14.2%
411	75.4%	13.8%	4.6%	4.7%	1.5%	9.4%
412	65.6%	16.5%	6.0%	9.5%	2.5%	14.2%
413	75.4%	13.8%	4.6%	4.7%	1.5%	9.4%
414	68.6%	15.6%	5.5%	8.1%	2.1%	12.8%
416	76.9%	15.0%	5.1%	2.0%	1.1%	8.1%
417	65.6%	16.5%	6.0%	9.5%	2.5%	14.2%
419	74.6%	11.6%	4.8%	4.7%	4.3%	9.6%
423	91.4%	4.3%	1.4%	0.7%	2.1%	3.2%
426	91.4%	4.3%	1.4%	0.7%	2.1%	3.2%
428	91.4%	4.3%	1.4%	0.7%	2.1%	3.2%
430	90.6%	5.1%	2.4%	1.3%	0.6%	3.0%
431	85.3%	8.1%	2.1%	3.8%	0.7%	6.3%
432	86.2%	7.6%	2.1%	3.4%	0.6%	5.8%
440	87.9%	7.6%	1.6%	2.2%	0.7%	4.5%
441	84.6%	9.7%	1.7%	2.9%	1.1%	5.9%
442	83.2%	10.2%	2.0%	2.9%	1.7%	6.9%
453	91.2%	5.2%	1.6%	1.1%	0.8%	3.1%
463	91.4%	5.5%	1.5%	1.0%	0.5%	2.6%
476	87.0%	7.5%	2.5%	0.8%	2.3%	4.2%
480	84.7%	8.2%	3.6%	1.6%	1.8%	5.0%
483	84.8%	7.9%	3.8%	1.7%	1.8%	5.1%
484	83.2%	9.0%	3.5%	1.8%	2.4%	5.1%
485	83.2%	9.0%	3.5%	1.8%	2.4%	5.1%
490	86.3%	7.3%	3.5%	1.6%	1.3%	4.9%
Systemwide	82.7%	8.9%	3.3%	3.4%	1.7%	6.5%

Source: American community survey (ACS) demographics applied to route catchment areas.

Appendix H – Title VI Service Monitoring ATL Board Presentation, and meeting minutes

Figure 1: ATL Board Presentation – Title VI Service Monitoring



Xpress Title VI Service Standards Monitoring Timeline



2018	✓ Last Title VI service standards monitoring
2019-2021	☐ Onboard survey delayed due to COVID-19 pandemic
July-September 2022	✓ Ongoing monitoring effort
September 1	ATL Operations Committee First Read
September 30	Final Results Memo for ATL Board Review
October 6	ATL Board Action
October 10	Final Report Submittal to FTA
Within or before 2025	Next Monitoring



Evaluation Approach

1. Identify focus routes and park & ride lots
2. Evaluate each service standard
3. Identify any adverse effects, disparate impacts, or disproportionate burdens on focus routes

Service Standards Categories Adopted 2020	
✓	Service Availability
✓	Trip & Route Productivity – <i>New</i>
✓	Vehicle Headway – <i>New</i>
✓	Maximum Vehicle Load
✓	On-Time Performance
✓	Vehicle Assignment
✓	Distribution of Transit Amenities – <i>New</i>





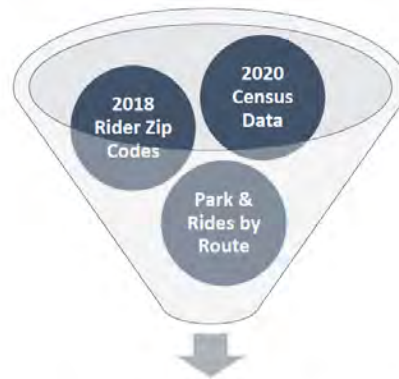
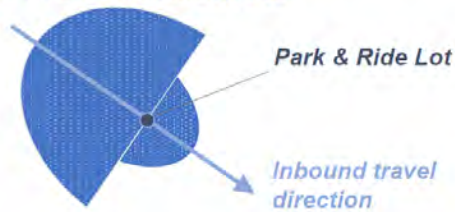
Focus Routes – Demographic Analysis

► **Problem:**

How to identify “minority routes” and “low-income routes” without current rider demographics?

► **Solution:** Geospatial Analysis

Park & Ride Catchment Area



Catchment Area Demographics by Route



Title VI Focus Routes



► 8 of 27 Routes identified as focus routes:

- “Minority Route” - percentage of minority population in the route catchment area exceeds 15 percentage points above systemwide average
- “Low Income Route” - percentage of low-income population in the route catchment area exceeds 3 percentage points above systemwide average

Focus Type	Route	Minority Percentage	Low Income Percentage
Minority & Low Income	423	78.9% *	35.8%
	426	78.9% *	35.8% *
	428	78.6% *	35.1%
	440	80.1%	30.1%
	441	80.4% *	30.0%
	442	84.2% *	36.9% *
Low Income	431	72.8%	29.0%
	453	53.2%	29.9%
	Systemwide	58.4%	25.7%

* Asterisked routes were also focus-routes in 2018.



Service Availability

► Standard:

Operate at least one route on each major corridor entering metro Atlanta: I-75 from the north and south, I-85 from the north and south, and I-20 from the east and west.

► Monitoring Results:

- ✓ Service standard met.
- ✓ No disparate impact or disproportionate burden.

Named Interstates

- I-85 N: 410, 411, 412, 413, 414, 416, 417
- I-85 S: 453
- I-20 E: 423*, 426*, 428*
- I-20 W: 463, 476
- I-75 N: 480, 483, 484, 485, 490
- I-75 S: 430, 431, 432*, 440, 441*, 442*

Other Major Corridors

- US-78: 419*
- US-278: 476
- GA-400: 400, 401
- US-575: 490

* Asterisked routes were focus-routes in 2018. Color coded routes are current focus routes from the 2022 analysis.



New

Trip and Route Productivity

► Purpose:

These standards are focused on the ability of ATL to sustainably operate Xpress, recognizing that new routes take time to attract ridership.

► Standards by Route Age:

- Minimum expected farebox recovery ratio
- Minimum average customers per trip

► Productivity Improvement Policy:

- Corrective measures may be considered for underperforming service.
- Any major service change will require an equity analysis.

Pre-pandemic Service Standards:

Years of Operation	Farebox Recovery Standard	Customers per Trip Standard
Year 1	10%	8
Year 2	15%	11
Year 3	20%	14
Years 4+	25%	17



New



Trip and Route Productivity

► Purpose:

These standards are focused on the ability of ATL to sustainably operate Xpress, recognizing that new routes take time to attract ridership.

► Standards by Route Age:

- Minimum expected farebox recovery ratio
- Minimum average customers per trip

► Productivity Improvement Policy:

- Corrective measures may be considered for underperforming service.
- Any major service change will require an equity analysis.

► Monitoring Results: (Pre-pandemic Standards)

Years of Operation	Minimum Farebox Recovery Standard	Actual FY22 Percent Farebox Recovery	Minimum Customers per Trip Standard	Percent of Trips Meeting Customers per Trip Standards Jan - Jun '22
Year 1	10%	up to 3%	8	up to 6%
Year 2	15%	N/A	11	N/A
Year 3	20%	N/A	14	N/A
Years 4+	25%	up to 11%	17	up to 24%

- ✓ Major service change adopted in July 2021 showed **no disparate impact or disproportionate burden.**
- ✓ Ongoing corrective measures focus on raising awareness.

Note: Subsequent studies may provide recommendations.



Maximum Vehicle Load



► Standard and Policy to Avoid Crowding:

- No Xpress trip shall have more than 15 standees.
- Service modifications will be considered for routes and trips where standing loads occur more often than once per week on average.

► Monitoring Results:

(January 1, 2022 – June 30, 2022)

- ✓ No route violated the standard.
- ✓ **No disparate impact or disproportionate burden.**



New

Vehicle Headway



► Purpose:

This standard uses trip and route productivity standards to determine appropriate service levels including the number of trips by route, and route headways.

► Standards / Policy:

Scheduled headways relate to productivity and demand.

- For crowded routes and trip times, ATL may consider reducing headways.
- For under-productive routes and trip times, ATL may consider increasing headways.

► Current Schedule (July 2021 – Present) → Monitoring Results

Number of Routes by Frequency Category		Average Scheduled Headways	Percent of Trips Meeting Customers per Trip Standards	Title VI Focus
				■ Focus Routes ■ Non-Focus
8 Higher Frequency	11 – 18 daily trips	up to 40 minutes	up to 24%	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 10px; background-color: orange; margin-right: 5px;"></div> 2 <div style="width: 20px; height: 10px; background-color: blue; margin-left: 10px; margin-right: 5px;"></div> 6 </div>
11 Mid-Frequency	6 – 10 daily trips	up to 63 minutes	up to 16%	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 10px; background-color: orange; margin-right: 5px;"></div> 4 <div style="width: 20px; height: 10px; background-color: blue; margin-left: 10px; margin-right: 5px;"></div> 7 </div>
8 Lower Frequency	4 daily trips	up to 90 minutes	up to 6%	<div style="display: flex; align-items: center;"> <div style="width: 20px; height: 10px; background-color: orange; margin-right: 5px;"></div> 2 <div style="width: 20px; height: 10px; background-color: blue; margin-left: 10px; margin-right: 5px;"></div> 6 </div>

✓ No disparate impact or disproportionate burden.



On-Time Performance (OTP)



► Standard:

- At least 85% of Xpress trips shall depart on time (less than 5 minutes after scheduled departure time). In other words, there shall be no more than 15% late trips.
- Zero trips shall depart early. In other words, the Xpress system shall achieve 0% of trips "running hot."

► Monitoring Results:

January 1, 2022 – June 30, 2022

Route Category	On-Time Trips	Early Trips
Minority Focus	89%	0.2%
<i>Non-Minority</i>	87%	0.6%
Low Income Focus	91%	0.2%
<i>Non-Low-Income</i>	86%	0.6%
Overall	88%	0.5%

✓ No disparate impact or disproportionate burden.



Vehicle Assignment

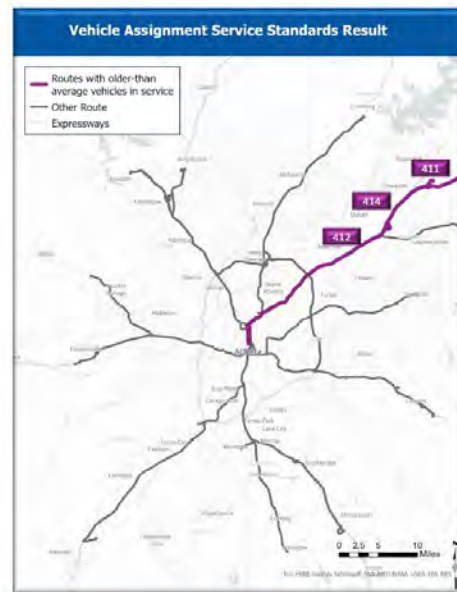
► Standard:

Rotate Xpress vehicles so that no route receives vehicles that are on average more than 3 years older than the average age of vehicles in service

► Monitoring Results:

(July 1, 2021 – June 30, 2022)

- ✓ No routes fell below the standard; three routes had 1-year older than average vehicles.
- ✓ No disparate impact or disproportionate burden.



New

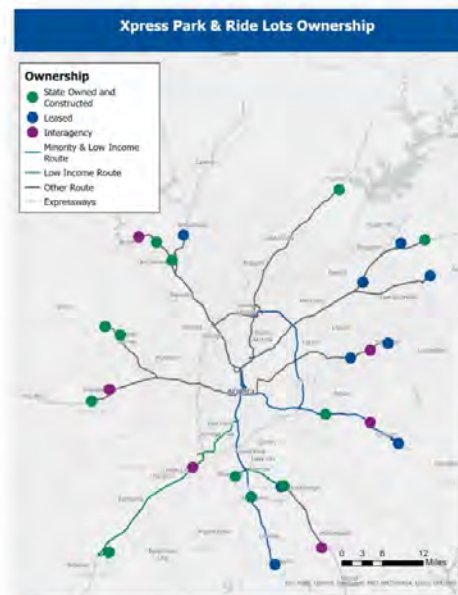
Distribution of Transit Amenities

► Standards Vary by Park & Ride Lot Ownership:

- State Owned & Newly Constructed – Passenger pavilions, route and schedule displays, benches, waste receptacles, ADA parking spaces, fare pavilion, and an equipment room.
- Leased Lots – Passenger shelter, and ADA parking spaces
- Interagency Lots – No requirements

► Monitoring Results:

- ✓ All park & ride lots currently meet customer-facing amenity standards.
- ✓ No disparate impact or disproportionate burden.



Summary: *no disparate impact or disproportionate burden*



Current Service Standards Categories	Point of View	Required by FTA Circular 4702.1B	Title VI Impacts (2022)	Additional Service Standards Considerations
Service Availability	Customer	✓	-	-
Trip & Route Productivity	Agency*	-	-	✓
Maximum Vehicle Load	Customer	✓	-	✓
Vehicle Headway	Customer*	✓	-	✓
On-Time Performance	Customer	✓	-	✓
Vehicle Assignment	Customer	✓	-	-
Distribution of Transit Amenities	Customer	✓	-	-

Legend: - No, ✓ Yes | * Note: Vehicle headways are related to productivity standards.



Next Steps



► Actions and Submissions

October 6 → ATL Board Action

October 10 → Submittal to FTA

► Follow-up

- Peer review of service standards
- *Xpress Return to Ridership* study
- Potential service adjustments



Figure 2: ATL Board meeting minutes – Title VI Service Monitoring

**Atlanta-region Transit Link Authority
245 Peachtree Center Ave., Suite 2300
Atlanta, GA 30303**

Board Meeting Minutes

October 6, 2022

MEMBERS PRESENT

Charlie Sutlive, Chair
Dan Buyers
Felicia Franklin
Andy Macke
Earl Ehrhart – virtual
Russell McMurry
Howard Mosby
Marci Collier Overstreet
Robb Pitts
Michael Thurmond
Todd Ver Steeg
Chuck Warbington
Tom Weyandt
Paul Radford
Teddy Russell

MEMBERS ABSENT

Charlotte Nash
Michael Thurmond

CALL TO ORDER

The meeting was called to order at 8:35 a.m. and a quorum was confirmed.

APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING

Chair Sutlive called for a motion to approve the minutes for the Board meeting held on September 1, 2022. Mr. Mosby made the motion to approve the minutes, and Mr. Mosby seconded. The Board unanimously approved the minutes.

APPROVAL OF THE BOARD AGENDA

Chair Sutlive called for a motion to approve today's agenda. Mr. Radford made the motion to approve the agenda, Mr. Weyandt seconded. The agenda was unanimously approved.

PUBLIC COMMENT

None.

2023 ATL BOARD CALENDAR

Chair Sutlive called for a motion to approve the 2023 Board Calendar that was previously circulated. Mr. Radford made the motion, and Mr. Macke seconded. The 2023 Board Calendar was approved unanimously.

XPRESS TITLE VI SERVICE STANDARDS MONITORING

Jamie Fischer gave a presentation on the Xpress Title VI Service Standards Monitoring. Title VI Monitoring Requirements include establishing the service standards and monitoring the service standards at least once in every 3 years. Performance measures and policies are used to plan or distribute services and benefits within a transit service area. The evaluation approach is to identify routes and park and ride lots, evaluate each service standard and to identify any adverse effects, disparate impacts, or disproportionate burdens on focus routes. The next monitoring will occur before the end of 2025.

Chair Sutlive called for a motion to approve the Xpress Title VI Service Standards Monitoring. Ms. Franklin made the motion, and Mr. Ehrhart seconded the motion. It was unanimously approved.

PRIORITY INVESTMENT LIST PROJECT PRESENTATIONS

- Douglas County
 - Ron Roberts gave the Board an update on Douglas County's priority investment list projects which include bus shelters and passenger amenities.

- Cobb County
 - Laura Beall gave the Board an update on Cobb County's priority investment list projects which includes three planned multimodal transit centers: Cumberland Transfer Center, Marietta Transfer Center, and South Cobb Transfer Center.

- Gwinnett County Transit
 - China Thomas and Natasha Tyler gave the Board an update on Gwinnett County's priority investment projects which includes Athens Regional Commuter Bus Service, Buford/Sugar Hill/Suwannee Microtransit Zone, Dacula/Lawrenceville Microtransit Zone, Gwinnett Place Transit Center, Lawrenceville Transit Center, and Lawrenceville to Snellville New Local Bus Service.

Annual Report and Audit (ARA)UPDATE

Alanna McKeeman, with FourSquare, gave the Board an ARA update. The ATL's ARA covers all transit planning, funding, and operations in the 13-county ATL region and covers the period from July 1, 2021 – June 30, 2022. Some of the findings are preliminary and still undergoing review by operators. Ridership at the end of FY 2022 was higher than that of the previous summer. Ridership reached its lowest points in January and February 2022, coinciding with the spread of COVID-19 Omicron variant in Georgia. Mid-

day travel at the end of 2021 was the same or slightly higher compared to mid-day travel in 2019. On time performance remained very high for Xpress compared to pre-pandemic levels.

EXECUTIVE DIRECTOR'S REPORT

Heather Aquino discussed the following items:

- National Ambient Air Quality Standards
- Transit Asset Management Plan
- Federal Transit Cluster Audit

NEW BUSINESS

None.

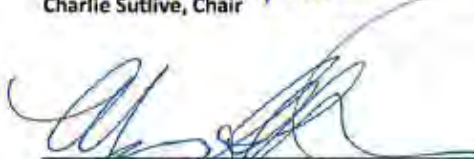
ADJOURNMENT

The meeting adjourned at 9:52 a.m.

APPROVED:


Charlie Sutlive, Chair

APPROVED AS TO FORM:


Merryl Mandus, Chief Legal Officer

ATTEST:



Monica Russell, Board Liaison

DATE MINUTES APPROVED:

1/5/23

Appendix I – Equity Analysis Memorandums, Board Presentations, and Board Approvals

Figure 1: ATL Memorandum – Proposed Route Eliminations



ATL

ATLANTA REGION
 TRANSIT LINK
 AUTHORITY

Memorandum

To: Gail Franklin, Chief Transit Officer

From: Parker Martin, Program Development Manager

Subject: Results of Equity Analysis and Public Comment for Proposed Route Eliminations

Date: 11/03/2020

OVERVIEW


The Xpress commuter bus service operates 27 routes in 12 metro-Atlanta counties. These routes provide transportation services to several activity centers in the Atlanta area including Downtown, Midtown, and the Perimeter Center area. Additionally, a few routes provide direct access to MARTA rail stations that provide transfer opportunities to other regional activity centers, such as Downtown, Midtown, and Perimeter Center area.

The Xpress Service Standards and Policies document, approved by the ATL Board of Directors on October 1st, 2020, sets minimum productivity standards for Xpress routes depending on the age of the route (see Table 1 below). The purpose of this standard is to ensure Xpress continues to provide a cost-effective, equitable, and productive public transportation option for commuters in the Xpress service area.

Table 1: Xpress Trip and Route Productivity Standard (Minimum Customers per Trip)

Service Standards	Years of Operation			
	Year 1	Year 2	Year 3	Year 4 & Longer
Minimum Customers Per Trip	8	11	14	17

Routes 408 (Johns Creek – Chamblee MARTA Station) and 482 (Town Center – Perimeter Center Area) have consistently performed under these productivity standards, even prior to the systemwide ridership impacts of COVID-19. In Fiscal Year 2019 (the most recent year of ridership data not impacted by COVID-19) Route 408 averaged 7.89 passengers per trip, and Route 482 averaged 4.08 passengers per trip. Route 408, having been in operation for more than 4 years (15 years in operation), is held to a minimum productivity standard of 17 passengers per trip. Route 482 began operation in August 2017 and is held to the year 2 standard of 11 passengers per trip.



245 Peachtree Center Avenue, Suite 2200 / Atlanta, GA 30303

Due to under-performance, Xpress proposes to eliminate these two routes from service. To ensure these route eliminations do not disparately impact minority riders or disproportionately impact low income riders, an equity analysis was conducted.

BACKGROUND

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The ATL and its Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

As a transit provider operating 50 or more fixed route vehicles in peak service that is located in an urbanized area of 200,000 or more in population, the ATL is required to analyze the impacts of any fare and/or major service changes on minority and low-income riders as required Section IV.7.of FTA C 4702.1B.

Title VI guidance also requires that ATL develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). These policies must establish a threshold for determining when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations. It is ATL's policy that the effects of any major service change will result in a disparate impact if the expected distribution of adverse effects to minority passengers is 15 percentage points more than the SRTA-operated Xpress average minority passenger distribution. Proposed major service changes will result in a disproportionate burden if the expected distribution of adverse effects to low-income passengers is 3 percentage points more than the SRTA-operated Xpress average low-income passenger distribution

METHODOLOGY

The proposed major service change will eliminate Routes 408 and 482 commuter bus service from the Xpress system. In order to estimate the impacts of the proposed major service change with available data, the following assumptions were made:

- ATL's definition of low-income is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines. Using the poverty guidelines and the average household size for Xpress riders, the Xpress low-income threshold would be \$20,340 per household. However, based on the income categories in the 2018 Xpress Ridership Survey, a low-income threshold of \$30,000 was used



in this analysis. This definition is at least as inclusive as the threshold defined by the HHS poverty guidelines.

- ATL's definition of minority riders, for purposes of measuring the impacts of major service changes and fare changes, is any Xpress rider who indicated race/ethnicity as anything other than "white."
- COVID-19 has had significant ridership impacts for all Xpress routes. At this time no other demographic information is available to determine the makeup of riders for the two Xpress routes, other than what has been collected in the latest Xpress Onboard Survey (2018). For purposes of this analysis, it is assumed that the proportion of minority and low-income riders on Routes 408 and 482 are consistent with the latest survey data.

RESULTS OF MAJOR SERVICE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of riders who will be impacted by the proposed major service change, the results indicate that the proposed route eliminations will result in a disproportionate burden to low-income riders. The results do not indicate there will be a disparate impact to minority riders.

A detailed analysis of the impacts the proposed major service changes will have on minority and low-income customers may be found in [Appendix A](#).

JUSTIFICATION AND MITIGATION

Both Routes 408 and 482 are under-performing routes in the Xpress commuter bus system and consistently fall below the Xpress Trip and Route Productivity standard for customers per trip. Several scheduling and other operational adjustments have been made in the past few years to improve route productivity, however both routes failed to improve with these adjustments. Despite the disproportionate burden to low-income riders, ATL staff are recommending eliminating the two routes based on the under-performance in accordance with the approved Xpress service standards. Additionally, because continuing to operate Routes 408 and 482 is not fiscally feasible given existing budget constraints, there are no other alternatives that would have a less disproportionate burden to low-income riders.

To mitigate the negative impacts to low-income riders, Xpress will educate riders on alternative transit options through onboard communications, the ATL and Xpress websites and social media, email and text notifications, and a press release. The alternative transit options will include existing transit services provided by Gwinnett County Transit, MARTA, and other Xpress routes. Specifically, for Route 408, the Gwinnett County Transit Route 35 serves a portion of the existing Xpress route and shares some of the same stops. MARTA also has the nearby Doraville and Chamblee stations as well as local bus service.





For Route 482, other Xpress routes provide service to the Town Center park and ride lot and provide transfer opportunities to MARTA stations in Downtown and Midtown to the Perimeter Center area. Additionally, information about alternative commute options including vanpool and carpool will be provided to riders impacted by the proposed major service changes.

PUBLIC COMMENT

The Atlanta-Region Transit Link Authority held a 30-day public comment period on behalf of its Xpress regional commuter bus service. The goal of the public comment period was to allow the public, and more specifically Xpress customers, with the opportunity to provide direct feedback and input into the proposed route eliminations of Route 408 and 482. During the 30-day public comment period, staff provided direct outreach to customers through a public notice that was posted in several news publications and on the ATL and Xpress websites, flyers distributed to customers, information displayed on monitors of coaches, social media postings, text message notifications, as well as six public outreach events (two specific to each route and two for both routes at ATL/Xpress headquarters).

A public hearing was held on October 29th, 2020 in the ATL offices to provide in-person feedback and was advertised on the Xpress website and in several regional newspapers of general circulation. Specifically, notices were placed in the Atlanta Daily World, Atlanta Chinese News, The Atlanta Voice, Mundo Hispanico, Korea Daily, CrossRoads News, and Atlanta Daily World. Information about the proposed changes and public comment period were also posted on Xpress social media accounts, Facebook and Twitter, as well as on local television, WSB-TV.

ATL staff also conducted in-person outreach events at locations more accessible to riders of the routes proposed for elimination. ATL staff were present at the Chamblee MARTA Station (Route 408) on October 22nd from 6:00 AM to 8:30 AM and 4:15 PM to 6:00 PM. Staff were also present at the Town Center / Big Shanty Park and Ride lot (Route 482) on October 27th from 5:15 AM to 6:30 AM and 4:15 PM to 6:00 PM.

In total, three comments were received as part of the 30-day public comment period. One comment was in support of the proposed route reductions, with two others specifically highlighting customer concerns about eliminating route 408. The two comments regarding route 408 specifically focused on Xpress being the only transit provider offering connected services between the Emory Johns Creek area and the MARTA rail system. The two customers that commented against the elimination of route 408 also highlighted the criticality of that route to their daily commute to and from work/school. Finally, there were no comments related to the elimination of route 482 explicitly. More detail on the comments received may be found in the attached PDF.





ATL

ATLANTA REGION
TRANSIT LINK
AUTHORITY

CONCLUSION

Based on the results of the equity analysis, comments received from Xpress riders, and an analysis projecting the impact of the major service changes on low income/minority riders, as well as identifying sufficient available mitigation efforts, it is the recommendation of ATL staff that the ATL Xpress Operations Committee and the ATL Board of Directors approve the elimination of Xpress route 408 and 482.



245 Peachtree Center Avenue, Suite 2200 / Atlanta, GA 30303



ATL

ATLANTA REGION
TRANSIT LINK
AUTHORITY

Appendix A: Detailed Results of Equity Analysis for Proposed Major Service Change

For the purposes of analyzing the impacts of this proposed change, ridership from the 2018 Xpress On-Board Survey was used to analyze the impacts to minority and low-income riders.

Xpress riders were categorized as minority or low-income riders depending on responses in the onboard survey. Minority riders are defined as any rider indicating a race/ethnicity other than white, single-race, non-Hispanic. Low-income riders were defined as any rider who indicated an annual household income less than \$30,000.

The ATL Title VI Policy sets thresholds for determining disparate impacts to minority riders and disproportionate burdens to low-income riders. Any major service change that impacts a ridership group with at least 85% minority riders, would be considered a disparate impact. Similarly, any major service change which negatively impacts a ridership group with at least 11% low-income riders would be considered a disproportionate burden. The table below presents the final results of the analysis, for both minority and low-income riders.

Table 2: Results of Title VI Equity Analysis


	% Minority Riders	% Low-Income Riders
Xpress Title VI Threshold	85%	11%
Combined Routes 408 and 482	75%	23%
Route 408	92%	38%
Route 482	50%	0%



Public Comment Period 10/2/2020 - 10/31/2020				Public Comments Received	
Name	Date	Phone	Email	Comment	Method
Virginia Seymour	30/22/2020	770-990-6231	vsymour@virginia (no domain provided)	We need this bus route for work. Folks do not understand the importance of transportation. (1) I usually use Xpress because it is safe and reliable. I love this side and would like to continue to use it. (2) Xpress 408 route is the only bus service in Johns Creek near Emory Hospital. There isn't any other public service like MARTA or OCT available in that area. I would highly request to continue to this service to provide public transportation in John's Creek. I live in Johns Creek and take Xpress to Chamblee and then rail to Georgia Tech. I would have to drive 20 minutes to take MARTA which is very painful since it is 9 miles from home.	Public outreach event on 30/22/2020 at Chamblee Station
Wazi Bui	30/22/2020	770-910-5213	wazi@bui123@gmail.com		Public outreach event on 30/22/2020 at Chamblee Station
Matthew Robbins	30/15/2020	954-937-5607		I'm commenting on the proposed route changes for the Xpress bus line. Would like to say that I completely support it, if you guys think that these routes are under used, no reason for us to be funding them, and there is other options so it is a terrific decision, very efficient. So, hopefully you guys will be able to get this done."	TELEPHONE CALL


Figure 2: Proposed Route Eliminations Presentation




A Regional Transit Operator within the ATL 

PROPOSED SERVICE CHANGES

Dionne Kirksey
November 5, 2020



A Regional Transit Operator within the ATL 

PRESENTATION OUTLINE

- Background of Routes
- Service Standards
- Justification for Proposed Service Elimination
- Title VI Equity Analysis
- Mitigation Measures
- Public Comment and Outreach
- Conclusion and Next Steps

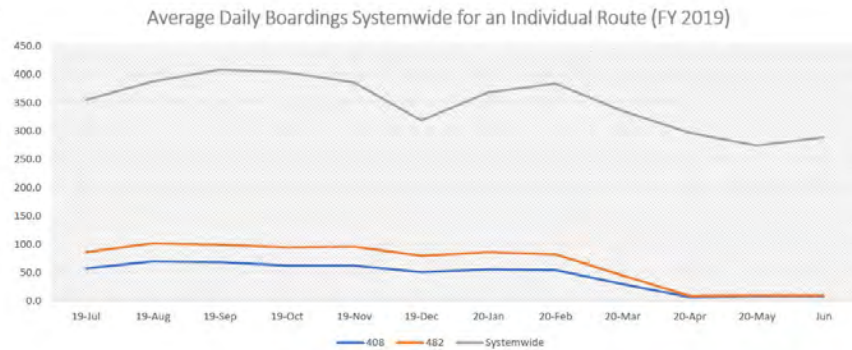
BACKGROUND

□ Route 408 - Chamblee MARTA Station to Johns Creek

- Service Commenced – May 2005
(15 years)

□ Route 482 – Town Center (Big Shanty) to Perimeter Center Area

- Service Commenced – August 2017 (3 years)



SERVICE STANDARDS



□ Tools to measure/evaluate route and service performance

- Identifies underperforming or unproductive service
- Major Service Change consists of one of the following:
 - ✓ Addition of a new route
 - ✓ Elimination of existing route
 - ✓ Change to route that increases/decreases revenue hours by at least 25%

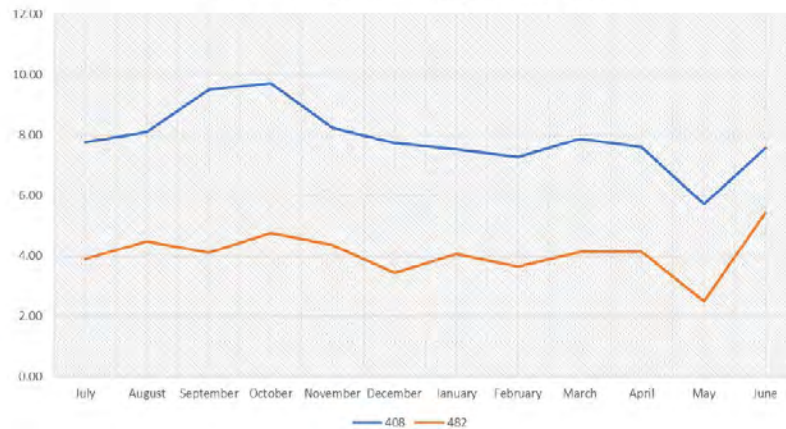
□ Proposed Major Service Changes require public participation, equity analysis, and board approval

JUSTIFICATION FOR PROPOSED SERVICE ELIMINATION

- Xpress is proposing the elimination of Routes 408 and 482 due to low ridership
- Decision based on Xpress Trip and Route Productivity Standards

Service Standards	Years of Operation			
	Year 1	Year 2	Year 3	Year 4 & Longer
Minimum Customers Per Trip	8	11	14	17

Average Passengers Per Trip by Month (FY 2019)



TITLE VI EQUITY ANALYSIS

- Purpose of the analysis is to determine if proposed changes result in adverse impacts to minority and low-income groups
- Route eliminations will result in disproportionate burden to low-income riders

Title VI Threshold Low Income Riders Percentage	
Xpress Title VI Threshold	11%
Combined Routes %	23%
Route 408	38%
Route 482	0%

- No disparate impact to minority riders



MITIGATION MEASURES

□ To mitigate the disproportionate burden to low-income riders, Xpress will educate riders on alternative transit options through:

- Press release
- Flyers distributed to customers & information displayed on monitors of coaches
- Social Media- (Facebook and Twitter)
- Website
- E-Newsletter
- SMS Text (Everbridge)

▪ **Route 408**

- ✓ GCT Route 35 (Peachtree Pkwy – Doraville MARTA Station)
- ✓ MARTA Rail (Gold Line)
- ✓ Carpool/Vanpool

▪ **Route 482**

- ✓ Xpress 480 Acworth/Town Center (Big Shanty) to Downtown
- ✓ Xpress 483 Woodstock/Town Center (Big Shanty) to Midtown
- ✓ MARTA Rail (Red Line)
- ✓ Carpool/Vanpool

16

PUBLIC COMMENT AND OUTREACH

□ **Public Comments Period + Process:**

- Public comment period – (October 2, through October 31, 2020)
- Comment platforms
 - ✓ Email : titleVI@atltransit.ga.gov
 - ✓ Phone: (404) 893 – 2100
 - ✓ In-person at Outreach Events (Comment Cards)
 - ✓ Mail: 245 Peachtree Center Avenue, NE Suite 2200, Atlanta GA 30303

Language Assistance & Other Accommodations

□ **Public Outreach:**

- 6 Outreach events
 - ✓ October 22nd – Chamblee MARTA Station (6:00am – 08:30am & 4:15pm – 6:00pm)
 - ✓ October 27th – Town Center (Big Shanty) Park and Ride Lot (5:15am – 6:30am & 4:15pm – 6:00pm)
 - ✓ October 29th – ATL Offices at Peachtree Center (12:00pm-2:00pm & 6:00pm – 8:00pm)
- Flyers distributed to customers and information displayed on monitors of coaches
- Social Media- (Facebook and Twitter)
- WSB-TV Commercial (Air dates 10/10/20, 10/22, 10/26 and 10/28)
- Newspapers (The Atlanta Voice, Korea Daily and Daily Report)

□ **Public Comments Received: (thru 10/23/2020)**

- 3 comment received (1 in support and 2 opposed) on the proposed route eliminations

17

CONCLUSION AND NEXT STEPS



- Staff is requesting Board consideration for elimination of Xpress Routes 408 and 482
 - ✓ Committee review and consideration on 11/5/2020
 - ✓ If recommended by committee then full Board consideration on 12/3/2020
- Notify the public of Service Elimination
- Proposed changes would be implemented on January 4, 2021



18



Questions?

19

Figure 3: Proposed Route Eliminations Resolution, ATL Board of Directors

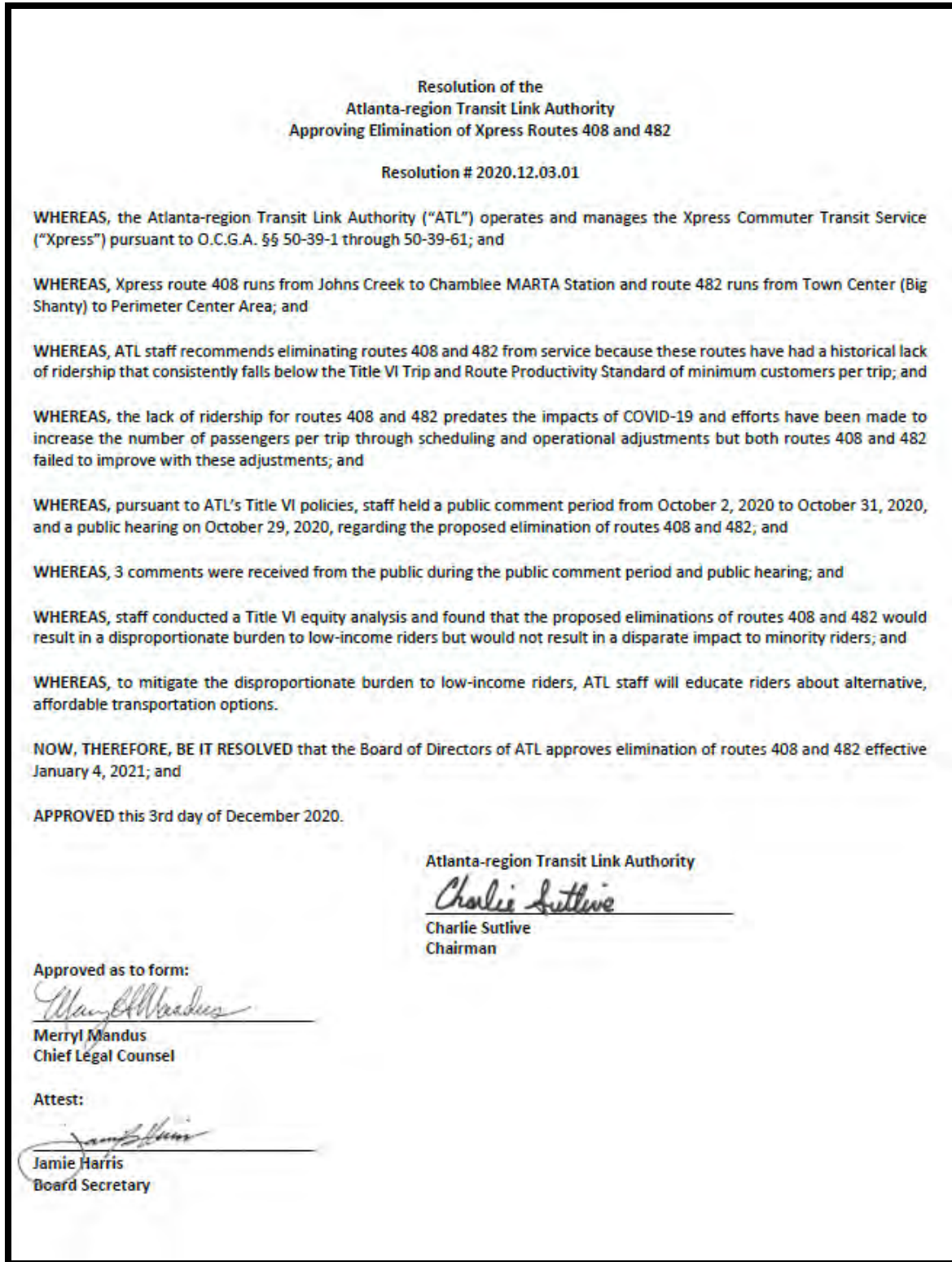



Figure 4: ATL Memorandum – Proposed New Routes



Memorandum

To: Gail Franklin, Chief Transit Officer

From: Parker Martin, Program Development Manager

Subject: Results of Equity Analysis and Public Comment for Proposed New Routes

Date: 3/29/2021

OVERVIEW


The Xpress commuter bus service operates 25 routes in 12 metro-Atlanta counties. These routes provide transportation services to several activity centers in the Atlanta area including Downtown, Midtown, and the Perimeter Center area. Additionally, a few routes provide direct access to MARTA rail stations that provide transfer opportunities to other regional activity centers.

Horizon 2 of the Direct Xpress Comprehensive Operations Analysis, approved by the Georgia Regional Transportation Authority (GRTA) in 2015, identified new service opportunities in the Xpress service area, particularly in the areas along the Northwest Corridor (NWC) of the region's express lane network. Xpress also recently completed construction of a new park and ride lot along Hickory Grove Road in north Cobb County that will provide strategic access to the express lane system, allowing Xpress to operate for free in the managed lanes and provide more reliable, free-flow service for riders.

To leverage the newly constructed park and ride lot, the ATL is proposing the creation of two new Xpress routes, 484 and 485, that will provide commuter bus service to Midtown and Downtown respectively. Proposed schedules for the two new routes may be found in **Appendix A**.

BACKGROUND

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The ATL and its Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.



245 Peachtree Center Avenue, Suite 2200 / Atlanta, GA 30303

As a transit provider operating 50 or more fixed route vehicles in peak service that is located in an urbanized area of 200,000 or more in population, the ATL is required to analyze the impacts of any fare and/or major service changes on minority and low-income riders as required Section IV.7.of FTA C 4702.1B.

Title VI guidance also requires that ATL develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). These policies must establish a threshold for determining when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations. It is ATL's policy that the effects of any major service change will result in a disparate impact if the expected distribution of adverse effects to minority groups is 15 percentage points more than the average minority population distribution for the Xpress 13-county service area. Proposed major service changes will result in a disproportionate burden if the expected distribution of adverse effects to low-income passengers is 3 percentage points more than the average low-income population distribution for the Xpress 13-county service area.

METHODOLOGY

The equity analysis for the two, new Xpress routes operated out of the Hickory Grove Park and Ride Lot was performed to measure the accessibility of the new service for vulnerable populations. In order to estimate the impacts of the proposed major service change with available data, the following assumptions were made:

- ATL's definition of low-income is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines. Using the poverty guidelines and the average household size for Xpress riders, the Xpress low-income threshold would be \$20,340 per household. However, based on the income categories in the most recent demographic data provided by the U.S. Census Bureau, a low-income threshold of \$35,000 was used in this analysis. This definition is at least as inclusive as the threshold defined by the HHS poverty guidelines.
- ATL's definition of minority riders, for purposes of measuring the impacts of major service changes and fare changes, is any Xpress rider who indicated race/ethnicity as anything other than "white."
- The catchment area for the park and ride lot, or area in which most of the anticipated customers of the new service reside, is defined as an ellipse with borders 1.5 miles southeast of the lot, towards the central business district of the region, 11.5 miles to the northwest of the lot, and a diameter at its widest of 8 miles north and west of the lot. The shape and position of the lot is based on evidence captured in past Xpress Onboard Surveys and other ongoing regional surveys, that most Xpress riders use park and ride lots between their homes



and their destinations. The distance a rider is expected to drive ‘backwards’ from their home to the nearest Xpress lot, is far less than the distance a rider will drive towards their eventual destination.

Census tracts that intersected the catchment area were used to represent the potential ridership of the new Xpress routes. A list of these census tracts, and a map representing their location, may be found in the **Appendix B**.

RESULTS OF MAJOR SERVICE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of riders who will be impacted by the proposed major service change, **the results indicate that the proposal to add two new routes will result in a disparate impact for minority groups. The results do not indicate there will be a disproportionate burden for low-income groups.**

A detailed analysis of the impacts the proposed major service changes will have on minority and low-income groups may be found in **Appendix C**.

JUSTIFICATION AND MITIGATION

To maximize usage of the new Hickory Grove Park and Ride Lot and regional managed lanes, Xpress is proposing adding two new routes along the NWC managed lane system. These routes will provide new, reliable transportation opportunities to residents in the surrounding area. However, the areas surrounding the new park and ride lot have a higher proportion of non-minority residents and therefore the benefits of the new routes disproportionately benefit non-minority groups. These impacts are unintentional, and Xpress will work to mitigate these impacts to the best of its ability.

To mitigate the negative impacts to minority groups, Xpress will focus outreach and education to minority population areas where Xpress could anticipate a transit need potentially served by the new routes. Xpress will also increase coordination efforts with other transit providers in the area, such as Bartow County Transit and Cherokee Area Transit Service (CATS).

PUBLIC COMMENT

The Atlanta-Region Transit Link Authority held a 30-day public comment period on behalf of its Xpress regional commuter bus service from March 1st, 2021 to March 31st, 2021. The goal of the public comment period was to provide the public with the opportunity to provide direct feedback and input into the proposed route additions. During the 30-day public comment period, ATL staff notified customers of the public comment period through several news publications, the ATL and





Xpress websites, flyers distributed to customers, information displayed on monitors of coaches, social media postings, and text message notifications.

A public hearing was held on March 18th, 2021 in the ATL offices to provide in-person feedback and was advertised on the Xpress website and in several regional newspapers of general circulation. Specifically, notices were placed in the Atlanta Daily World, Atlanta Chinese News, The Atlanta Voice, Mundo Hispanico, Korea Daily, CrossRoads News, Marietta Daily Journal, and Atlanta Daily World. Information about the proposed changes and public comment period were also posted on Xpress social media accounts, Facebook and Twitter.

As of March 29th, four comments were received as part of the 30-day public comment period, all in support of the proposed new routes.

CONCLUSION

Based on the results of the equity analysis, comments received from the public, and an analysis projecting the impact of the major service changes on low income/minority riders, as well as identifying sufficient available mitigation efforts, it is the recommendation of ATL staff that the ATL Xpress Operations Committee and the ATL Board of Directors approve the addition of Xpress routes 484 and 485.



Appendix A: Proposed Schedules for New Xpress Routes

- Route 484: Hickory Grove Park and Ride – Midtown

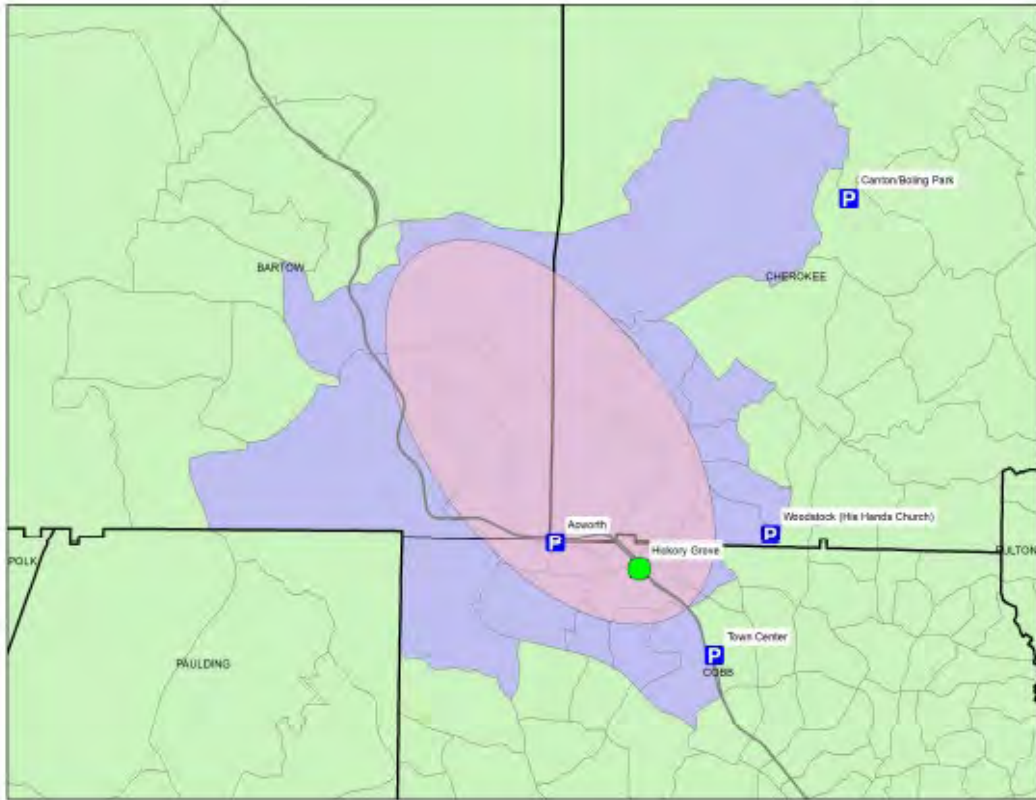
AM PEAK				PM PEAK			
Hickory Grove P&R	MARTA Civic Ctr Station	MARTA Arts Ctr Station	Atlantic Station	MARTA Civic Ctr Station	MARTA Arts Ctr Station	Atlantic Station	Hickory Grove P&R
6:30 AM	7:08 AM	7:23 AM	7:29 AM	4:15 PM	4:25 PM	4:29 PM	5:08 PM
7:30 AM	8:08 AM	8:23 AM	8:29 AM	4:45 PM	4:55 PM	4:59 PM	5:38 PM

- Route 485: Hickory Grove Park and Ride – Downtown

AM PEAK				PM PEAK			
Hickory Grove P&R	John Portman/ Peachtree	Auburn/ Peachtree	Federal Center (Forsyth/MLK)	Federal Center (Forsyth/MLK)	Peachtree Ctr Ave/Auburn	Baker/ Peachtree	Hickory Grove P&R
6:15 AM	6:55 AM	7:00 AM	7:08 AM	4:30 PM	4:38 PM	4:41 PM	5:35 PM
7:15 AM	7:55 AM	8:00 AM	8:08 AM	5:00 PM	5:08 PM	5:11 PM	6:05 PM



Appendix B: Hickory Grove Park and Ride Lot Catchment Area



Appendix C: Detailed Results of Equity Analysis for Proposed Major Service Change

Demographic information from the most recent American Community Survey was used for the equity analysis and compared the demographic characteristics of the people residing within the new Hickory Grove Park and Ride Lot catchment area, with the demographic characteristics of the Xpress 13-County service area.

The demographic characteristics of the 13-county region was used as a baseline to apply the ATL’s Title VI thresholds for measuring the impacts to minority and low-income groups. The term *minority* for purposes of the Title VI analysis refers to any person identifying with a race or ethnicity other than White, Non-Hispanic.

Using the baseline percent of the population categorized as minority with the Title VI threshold and comparing the demographic characteristics of the catchment area indicates that there is a disparate impact to minority groups, due to the fact that minority population percentage does not meet the threshold percentage for the Xpress service area. In other words, the catchment area for the new lot and subsequent routes, includes a population with a much higher proportion of white, non-Hispanic residents than compared to the 13-county service area as a whole.

Table 1: Results of Title VI Equity Analysis

	Percent Minority Population
Title VI Threshold (13-County Region)	41%
Hickory Grove Catchment Area	32%

	Percent Low-Income Population
Title VI Threshold (13-County Region)	20%
Hickory Grove Catchment Area	22%

Figure 5: Proposed New Routes Presentation



A Regional Transit Operator within the **ATL** 



Northwest Corridor Project

Proposed Hickory Grove Service

Dionne Kirksey
April 1, 2021

OUTLINE

- Background
- Title VI Equity Analysis
- Mitigation Measures
- Public Comment and Outreach
- Conclusion/Next Steps



7

BACKGROUND



- Comprehensive Operations Analysis of the Xpress bus system in 2016 resulted in recommendations to improve service in the Northwest corridor

 - *Part of the recommendations included the following:
 - Expansion of Xpress service in the Northwest corridor to meet existing demand and future growth
 - Construction of two new park and ride lots (Hickory Grove and Roswell Road), and the expansion of the Town Center (Big Shanty) park and ride lot
- *Note: Efforts to implement recommendations were underway prior to Covid-19 pandemic*
- Updated analysis resulted in a proposed recommendation for new routes:
 - Route 484 (Hickory Grove Park and Ride – Midtown)
 - Route 485 (Hickory Grove Park and Ride – Downtown)



8

TITLE VI EQUITY ANALYSIS RESULTS



- Purpose of the analysis is to determine if proposed changes result in adverse impacts to minority and low-income groups

- New routes will result in a disparate impact for minority groups

Percent of Minority Population	
Title VI Threshold (13-County Region)	41
Hickory Grove Catchment Area	32

- No disproportionate burden to low-income groups



9



MITIGATION MEASURES

- Outreach and education to community groups, serving minority populations, in the areas served by the new routes
- Increase coordination with other area transit providers, such as Bartow County Transit and Cherokee Area Transit Service (CATS)
- Ongoing discussions with Cobb County Communications Department to disseminate information about new service plans.



10

PUBLIC COMMENTS AND OUTREACH



Public Comment Period

- March 1, 2021 – March 31, 2021
- 4 comments received



11

CONCLUSION



- Staff is requesting Board approval for implementation of new Xpress Routes 484 and 485
- Notify the public of New Service Implementation
- Proposed service would begin on May 3, 2021



12

QUESTIONS?
BOARD ACTION



Figure 6: Proposed New Routes Resolution, ATL Board of Directors

DocuSign Envelope ID: 022B214C-FF7D-4829-B63D-3528821E727F

**RESOLUTION
OF THE
ATLANTA-REGION TRANSIT LINK AUTHORITY
APPROVING
IMPLEMENTATION OF NEW XPRESS SERVICE - ROUTES 484 AND 485**

RESOLUTION # 2021.04.01.01

WHEREAS, the Atlanta-region Transit Link Authority (“ATL”) operates and manages the Xpress Commuter Transit Service (“Xpress”) pursuant to O.C.G.A. §§ 50-39-1 through 50-39- 61; and

WHEREAS, in 2016, Xpress completed a comprehensive operational analysis for the Xpress commuter bus system detailing the need for expansion of service in the Northwest Corridor in relation to the proposed park and ride lot construction at Hickory Grove, Cobb County, Georgia (“Hickory Grove P&R”); and

WHEREAS, Xpress proposes to operate new service from the Hickory Grove P&R consisting of two new routes: Route 484 is proposed to provide service to Midtown Atlanta and Route 485 is proposed to provide service to Downtown Atlanta; and

WHEREAS, ATL staff recommends the implementation of Routes 484 and 485; and

WHEREAS, pursuant to ATL’s Title VI policies, staff held a public comment period from March 1, 2021 through March 30, 2021 and a public hearing on March 18, 2021, regarding the proposed implementation of new Xpress Routes 484 and 485; and

WHEREAS, four comments were received from the public during the public comment period and public hearing; and


WHEREAS, staff conducted a Title VI equity analysis and found that the proposed implementation of Routes 484 and 485 would result in a disparate impact to minority groups, but would not result in a disproportionate burden to low-income riders; and

WHEREAS, to mitigate the disparate impact to minority groups, ATL staff will increase coordination with neighboring transit providers and provide focused outreach to community groups primarily serving minority groups.

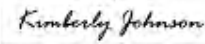
NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of ATL approve the implementation of new service on Routes 484 and 485, beginning May 3, 2021.

APPROVED this 1st day of April 2021.

Atlanta-region Transit Link Authority

DocuSigned by:

Charlie Sutlive
Chairman

Attest:

DocuSigned by:

Kimberly Johnson
Board Secretary

Approved as to form:

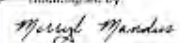

DocuSigned by:

Merryl Mandus
Chief Legal Officer

Figure 7: ATL Memorandum – Proposed Fare Changes



Memorandum

To: Gail Franklin, Chief Transit Officer

From: Parker Martin, Program Development Manager
Sanjay Senthilkumar, Senior Performance Analyst

Subject: Results of Equity Analysis for Proposed Fare Changes

Date: 6/17/2021

OVERVIEW

The Xpress commuter bus service operates 27 routes in 12 metro-Atlanta counties. Currently, Xpress has two options for fare payment: Cash and the MARTA Breeze Card. Cash users may pay single-trip fare rates (as shown in Figure 1 below), whereas Breeze Card users may pre-purchase any of the Xpress fare products to store on their smart card.

Figure 1: Existing Fare Structure for Xpress Routes


Operator	Fare Zone	
	Green Zone	Blue Zone
Fare Product		
Single Trip	\$3.00	\$4.00
Round Trip	\$5.00	\$7.00
10-Trip	\$25.00	\$35.00
31-Day	\$100.00	\$125.00
Calendar Month	\$90.00	\$125.00

Xpress is proposing to make two fare changes to the system:

- 1) Add contactless fare payment as a payment option
- 2) Introduce fare capping of the round-trip fare product for contactless payment users

During COVID-19, Xpress sought a contactless fare payment solution, otherwise known as mobile ticketing, to allow passengers to board Xpress coaches and minimize the need for physical contact. Xpress was able to partner with Token Transit, a contactless fare payment vendor to develop a pilot contactless fare payment system. After running the pilot program, Xpress is proposing to add contactless fare payment as a permanent option for Xpress riders.

As part of the implementation of the contactless fare payment system, Xpress introduced fare capping for the Xpress round trip fare product. The Xpress round trip fare product provides a one-



245 Peachtree Center Avenue, Suite 2200 / Atlanta, GA 30303



dollar discount over the single trip product and must be pre-purchased for Breeze Card users. For mobile ticketing users, a fare capping system is proposed that would convert same-day, single trip usages to the round trip rate, and refund riders the one-dollar difference. In summary, no change will be experienced by Cash and Breeze Card users, and the round-trip discount that is available to Breeze Cars users at the time of purchase, will be provided to mobile ticketing users as a refund. To accommodate both of these fare changes, an equity analysis was conducted using data collected from the pilot contactless payment program and compared with demographic information collected through the most recent Xpress Onboard Survey.

BACKGROUND

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The Atlanta-region Transit Link Authority (ATL) and its Xpress commuter service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

As a transit provider operating 50 or more fixed route vehicles in peak service that is located in an urbanized area of 200,000 or more in population, ATL is required to analyze the impacts of any fare change on minority and low-income riders as required by Section IV.7 of FTA Circular 4702.1B. Title VI guidance also requires that ATL develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). These policies must establish a threshold for determining when adverse effects of a fare change are borne disproportionately by minority and/or low-income populations. It is ATL's policy that the effects of any fare change will be considered disparate and/or disproportionate if the percent change in average cost per trip for minority or low-income riders differs more than 5 percentage points from the percent change for the overall ridership.



METHODOLOGY

To estimate the impacts of the proposed fare change with available data, the following assumptions were made:

- ATL's definition of low-income is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines. Using the poverty guidelines, and the average household size for Xpress riders, the poverty threshold for a household of four would be \$26,500. To include riders that are low-income but do not meet the HHS poverty guidelines, a low-income threshold of \$40,000, or 150% of the HHS poverty guidelines, was used in this analysis.
- ATL's definition of minority riders, for purposes of measuring the impacts of major service changes and fare changes, is any Xpress rider who indicated race/ethnicity as anything other than "white."
- COVID-19 has had significant ridership impacts for all Xpress routes. At this time, no other demographic information is available to determine the makeup of riders for Xpress routes, other than what has been collected in the latest Xpress Onboard Survey (2018). For purposes of this analysis, it is assumed that the proportion of minority and low-income riders on all Xpress routes are consistent with the latest survey data.

RESULTS OF FARE CHANGE EQUITY ANALYSIS

Based on the demographic analysis of riders who will be impacted by the two proposed fare changes, the results do not indicate that there will be a disparate impact to minority riders, nor will the proposed changes disproportionately burden low-income riders. A detailed analysis of the impacts the two proposed fare changes will have on minority and low-income customers may be found in Appendix A.

CONCLUSION

Based on the results of the equity analyses, it is the recommendation of ATL staff that the ATL Operations Committee, and the ATL Board of Directors, approve the addition of contactless fare payment and fare capping of the round-trip fare product, to the Xpress fare system.



Appendix A: Detailed Results of Equity Analysis for Proposed Fare Changes

For the purposes of analyzing the impacts of this proposed change, fare usage information collected from the pilot contactless payment program, as well as ridership and fare usage from the 2018 Xpress On-Board Survey, was used to analyze the distribution of usage rates between routes and compare with the minority and low-income distributions collected in the onboard survey.

Contactless Fare Payment

Xpress riders were categorized as minority or low-income riders depending on responses in the 2018 Xpress On-Board Survey. Statistical analysis shows that there is a slight relationship between higher non-minority routes and a higher usage of the contactless payment system. However, the proposed contactless fare payment system is not replacing any of the existing fare payment options and provides no cost reductions as a form of payment. No relationship was found between usage of the pilot program and the low-income status of riders. **From this analysis, it can be concluded that there is no disparate impact to minority riders and no disproportionate burden to low-income riders.**

Table 1 shows the demographic characteristics, taken from the 2018 Xpress On-Board Survey, of each Xpress route and the usage rate of the pilot contactless payment program by route. To calculate the usage rates of the pilot contactless payment program, usage information for Token Transit from April and May 2021 was collected and compared to the overall ridership by route for the same timeframe.

Table 1: Usage of Pilot Contactless Payment Program by Xpress Route

Route Number	% Low income	% Minority	% Token Usage
400	6%	62%	0%
401	4%	58%	0%
410	2%	66%	0%
411	3%	38%	15%
412	9%	61%	4%
413	13%	51%	7%
414	4%	51%	7%
416	12%	63%	5%
417	10%	69%	8%
419	20%	80%	3%
423	18%	92%	7%
426	21%	86%	5%
428	20%	89%	2%

430	14%	80%	8%
431	18%	74%	2%
432	15%	84%	4%
440	18%	80%	3%
441	23%	93%	1%
442	37%	93%	0%
453	14%	50%	8%
463	9%	71%	4%
476	13%	74%	1%
480	10%	62%	13%
483	4%	38%	0%
490	9%	32%	1%
Systemwide	14%	70%	6%

Fare Capping

With respect to fare capping, the available data, from the pilot program, does not provide details of fare product usage by a rider’s socio-economic characteristics. In lieu of this information, the percentage of contactless payment uses, in which a round-trip product was used, was compared to the route-level demographics. Statistical analysis results indicate a positive correlation between the percentage of minority riders and the percentage of users benefitting from round trip fare capping, meaning that minority riders were more likely to benefit from the round-trip discount than non-minority riders. **From this analysis, it can be concluded that there is no disparate impact to minority riders and no disproportionate burden to low-income riders.**

Table 2 shows the demographic characteristics, taken from the 2018 Xpress On-Board Survey, of each Xpress route and the usage rate of the fare-capped, round trip fare product offered by Token Transit. To calculate the usage rates of the fare-capped round trip product, usage information for Token Transit from April and May 2021 was collected and compared to the overall ridership by route for the same timeframe.

Table 2: Usage of Fare-Capped Round Trip Product as Percent of Boardings & Pilot Program by Route


Route Number	% Low income	% Minority	% Round trip of All boardings	% Round trip of Token
400	6%	62%	0%	0%
401	4%	58%	0%	0%
410	2%	66%	0%	0%
411	3%	38%	0%	3%




412	9%	61%	3%	67%
413	13%	51%	4%	50%
414	4%	51%	1%	10%
416	12%	63%	1%	29%
417	10%	69%	0%	0%
419	20%	80%	3%	88%
423	18%	92%	1%	8%
426	21%	86%	4%	76%
428	20%	89%	2%	83%
430	14%	80%	2%	28%
431	18%	74%	1%	33%
432	15%	84%	2%	48%
440	18%	80%	1%	43%
441	23%	93%	1%	57%
442	37%	93%	0%	0%
453	14%	50%	4%	43%
463	9%	71%	0%	13%
476	13%	74%	0%	11%
480	10%	62%	0%	2%
483	4%	38%	0%	0%
490	9%	32%	0%	0%
Systemwide	14%	70%	2%	33%



Figure 8: Proposed Fare changes Presentation




A Regional Transit Operator within the **ATL** 

PROPOSED CONTACTLESS FARE PAYMENT AND FARE CAPPING

Ryan Walker
July 1, 2021

Background

- ❖ Due to the COVID-19 pandemic, Xpress explored contactless mobile payment as an additional safety option for fare payment.
- ❖ In September 2020, Xpress introduced a *Pilot Program* for the contactless fare payment option and included fare capping.
- ❖ The objective of the Pilot Program was to provide an additional layer of safety by reducing the need for physical contact when boarding the bus.
- ❖ There are no impacts to existing fare payment methods. This is an additional payment option. All existing payment options remain in place.



12

Public Comment Period and Public Hearing



- ▶ Formal public comment period for the proposed service changes: March 1 – March 31, 2021
- ▶ Public Hearing Date: Thursday, March 18th (12:00PM – 2:00PM & 6:00PM – 8:00PM)
- ▶ No public comments were received.



13

Title VI Equity Analysis



Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance.

- ▶ No disparate impact to minority riders, or disproportionate burden to low-income riders was found for either fare change.



14



RECOMMENDATION

- ▶ Recommendation to ATL Board for approval of the proposed fare changes:
 1. Addition of the contactless fare payment option; and
 2. Addition of fare capping on the round-trip fare product, when using contactless fare payment, to the Xpress fare system.

- ▶ ATL Board consideration on August 5, 2021



15



QUESTIONS?



16

Figure 9: Proposed Fare changes Resolution, ATL Board of Directors

DocuSign Envelope ID: 691F9D89-569C-4AB1-BE13-1DB83E9E7894

**Resolution of the
Atlanta-region Transit Link Authority
Adopting Contactless Fare Payment**

Resolution # 2021.08.05.01

WHEREAS, at the beginning of the COVID-19 pandemic, ATL staff implemented several measures to increase the safety of riders and operators using Xpress;

WHEREAS, one of those measures included a contactless fare payment solution, also known as mobile ticketing, to allow passengers to minimize the need for physical contact when boarding Xpress coaches;

WHEREAS, the ATL pursued a pilot program testing this method of contactless fare payment system with customers;

WHEREAS, as part of the pilot program, the ATL introduced fare capping for the Xpress round trip fare product, converting same-day, single trip usages to the round trip rate, and refunding riders the one-dollar difference;

WHEREAS, Xpress customers who pre purchase a round trip ticket using a Breeze card receive a \$1.00 discount over the single trip product;

WHEREAS, based on the Xpress commitment to enhanced safety measures during the COVID-19 pandemic, the ATL desires to make contactless fare payment system, including fare capping, a permanent additional payment option for Xpress customers;

WHEREAS, a formal public comment period was held for the proposed service changes between March 1, 2021 and March 31, 2021, with public hearings held on March 18, 2021;

WHEREAS, no public comments were received; and

WHEREAS, based on the demographic analysis of riders who will be impacted by the proposed fare change, the results indicate that the proposed additional payment option will not result in a disproportionate burden to low-income riders.

NOW, THEREFORE, BE IT RESOLVED that the ATL Board of Directors:

- 1) Approves the use of contactless fare payment in the form of mobile ticketing for Xpress customers; and
- 2) Approves fare capping on the round-trip fare product by converting same-day, single trip usages to the round trip rate.

SO RESOLVED this 5th day of August 2021.

DocuSigned by:

Felicia Franklin

Felicia Franklin

Vice Chair

ATTEST:

DocuSigned by:

Jarrië Harris

Jarrië Harris

Board Secretary

APPROVED AS TO FORM:


DocuSigned by:

Merryl Mandus

Merryl Mandus

Chief Legal Counsel

Figure 10: ATL Memorandum – Proposed Major Service Change



Memorandum

To: Gail Franklin, Chief Transit Officer
Members of the ATL Board

From: Parker Martin, Program Development Manager
Bruce Hart, Performance Analyst
Jamie Fischer, Director of Transportation Performance & Innovation

Subject: Equity Analysis Results for Major Service Change

Date: 6/24/2021

OVERVIEW


The Xpress commuter bus service operates 27 routes in 12 metro-Atlanta counties. These routes provide direct transportation services to major activity centers in the Atlanta area including Downtown, Midtown, and the Perimeter Center area. Additionally, a few routes provide direct access to MARTA rail stations that provide transfer opportunities to other regional activity centers.

Due to the impact of COVID-19 on systemwide ridership, Xpress implemented emergency service changes during the pandemic. Due to the length of the pandemic, and the ongoing need to operate at a reduced schedule, the purpose of this equity analysis is to evaluate the service levels proposed to be implemented July 6, 2021 in comparison to the service levels that were operational immediately before the pandemic began. In comparison with pre-pandemic service, the proposed changes reduce revenue service hours for all Xpress routes by more than 25% and therefore meet the definition of a major service change. An overview of the service reductions by route may be found in Appendices A and B.

To ensure these service changes are not disparately impacting minority riders or disproportionately impacting low-income riders, an equity analysis was conducted.

BACKGROUND

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



245 Peachtree Center Avenue, Suite 2200 / Atlanta, GA 30303

1

service are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services based on race, color, or national origin, as protected by Title VI.

As a transit provider operating 50 or more fixed route vehicles in peak service that is in an urbanized area of 200,000 or more in population, the ATL is required to analyze the impacts of any fare and/or major service changes on minority and low-income riders as required Section IV.7.a of FTA C 4702.1B.

Title VI guidance also requires that ATL develop a policy for measuring disparate impacts (where minority populations are the protected class) and disproportionate burden impacts (where low-income populations are the protected class). These policies must establish a threshold for determining when adverse effects of a major service change are borne disproportionately by minority and/or low-income populations.

ATL's Title VI policy defines disparate impacts and disproportionate burdens for a major service change based on the percentage of minority and low-income riders on affected routes, compared to the proportion of minority and low-income riders in the system as a whole. A Disparate Impact is evident if affected routes have 15 percentage points more minority riders than the ATL-operated Xpress average minority passenger distribution. A disproportionate burden is evident if the affected routes has 3 percentage points more than the ATL-operated Xpress average low-income passenger distribution.

METHODOLOGY

To estimate the impacts of the proposed major service change with available data, the following assumptions were made:

- ATL's definition of low-income riders is consistent with the U.S. Department of Health and Human Services (HHS) poverty guidelines¹. Using the poverty guidelines and the average household size for Xpress riders, the Xpress low-income threshold would be \$26,500 per household. To include riders that are low-income but do not meet the HHS poverty threshold, a low-income threshold of \$40,000, or 150% of the HHS poverty guidelines, was used in this analysis.
- ATL's definition of minority riders, for purposes of measuring the impacts of major service changes and fare changes, is any Xpress rider who indicated race/ethnicity as anything other than "white" in the most recent on-board survey.
- COVID-19 is having a significant ridership impact for all Xpress routes. At this time no other demographic information is available to determine the makeup of riders for the Xpress

¹ HHS has published the 2021 Poverty Guidelines at this site: <https://aspe.hhs.gov/2021-poverty-guidelines>

routes, other than what has been collected in the latest Xpress Onboard Survey (2018). For purposes of this analysis, it is assumed that the proportion of minority and low-income riders on all Xpress routes are consistent with the latest survey data. It is also assumed that all demographic groupings within the ridership of each individual route are affected equally by the service changes made to that route.

RESULTS OF MAJOR SERVICE CHANGE EQUITY ANALYSIS

The proposed major service change impacts all currently operating Xpress routes that were also operating immediately before the COVID-19 pandemic began. According to the ATL major service change equity analysis policies outlined previously in this memo, the relative difference between the percentage of minority and low-income riders adversely impacted by the proposed service changes, and the Xpress system average for those groups is zero. Based on this comparison, **the proposed service reductions will not result in a disproportionate burden to low-income riders, nor will the service reductions result in a disparate impact to minority riders.**

To supplement the required analysis defined by the ATL Title VI equity analysis policy, additional statistical analyses were conducted to measure the differing severity of the proposed service reductions among routes with high percentages of minority and low-income riders, relative to routes with low percentages of non-minority and non-low-income riders. These analyses corroborated that there is no disparate impact or disproportionate burden.

A detailed analysis of the impacts the major service change has on minority riders may be found in **Appendix A.**

A detailed analysis of the impacts the major service change has on low-income riders may be found in **Appendix B.**

CONCLUSION

Based on the results of the equity analysis, it is the recommendation of ATL staff that the ATL Xpress Operations Committee and the ATL Board of Directors approve the proposed Xpress service changes.

As the effects of the COVID-19 pandemic subside and service increases are made, the equity impacts of increased service may be considered at appropriate times in the future.

Appendix A: Detailed Results of Equity Analysis for Major Service Change, Minority Riders

For the purpose of analyzing the impacts of this proposed change, ridership from the 2018 Xpress On-Board Survey was used to analyze the impacts to minority riders. Additionally, the major service change is based on all routes that were in service prior to the COVID-19 service change AND are currently in service. This resulted in a set of 25 routes (minus routes 484 and 485 that started service and routes 408 and 482 that were eliminated during the COVID-19 pandemic). Each of the 25 routes were evaluated for a minimum 25% service reduction with the service reduction based on the difference between revenue hours pre-COVID-19 service change and the projected revenue hours after the elimination of the COVID-19 service change (assumed to occur in July 2021). All the 25 routes exceeded the 25% service reduction (Table A1):

Table A1: Percent change of revenue hours for Xpress routes (pre- and post- major service change)

Route	Pre-COVID revenue hours	July 2021 revenue hours	Percent reduction
400	10.70	5.65	47.2%
401	6.92	4.45	35.7%
410	4.65	2.87	38.3%
411	15.02	10.62	29.3%
412	12.27	5.77	53.0%
413	13.48	8.25	38.8%
414	14.58	7.00	52.0%
416	14.27	7.90	44.6%
417	6.68	4.32	35.3%
419	28.48	18.78	34.1%
423	25.27	18.88	25.3%
426	34.63	21.07	39.2%
428	12.22	5.95	51.3%
430	18.00	12.73	29.3%
431	18.30	10.13	44.6%
432	21.33	9.78	54.1%
440	21.35	12.47	41.6%
441	12.12	7.05	41.8%
442	7.65	3.18	58.4%
453	22.78	12.75	44.0%
463	31.33	21.30	32.0%
476	27.58	10.05	63.6%
480	11.20	4.20	62.5%
483	15.07	7.92	47.4%
490	9.10	3.83	57.9%
Systemwide Total	414.9	236.9	42.9%
Average of Routes	16.60	9.48	42.9%

Because all routes are affected at the level of a major service change (greater than 25% reduction in revenue hours), all riders are also affected. Therefore, based on the definitions in ATL's Title VI equity analysis policy, there is no disparate impact on minority riders.

Going deeper than the required analysis, Table A1 shows that some routes are impacted more than others by the proposed service changes. Additional analysis was conducted to identify any racial or income-based patterns. Xpress riders were categorized as minority riders depending on responses in the onboard survey. Minority riders are defined as any rider indicating a race/ethnicity other than white, single-race, non-Hispanic. The ATL Title VI Policy sets thresholds for determining if disparate impacts to minority riders based on the proportion of minority riders on particular routes.

Systemwide, Xpress ridership includes 70.4% minority riders based on the 2018 Xpress On-Board Survey within the 25 routes described above. ATL's policy defines a disparate impact based on the proportion of minority riders on affected routes, compared to the proportion of minority riders in the system as a whole. A disparate impact is evident if affected routes have a percentage of minority passengers at least 15 percentage points more than the ATL-operated Xpress average minority passenger distribution. Therefore, 15% was added to the 70.4% systemwide minority ridership within the 25 routes. Routes with at least 85.4% minority riders were identified for additional analysis associated with the major service change. Table A2 presents the results of the minority rider analysis, which identified five routes for additional consideration.

The five routes identified in Table A2 as having a high percentage of minority riders (442, 428, 441, 426, and 423) were targeted for additional analysis. The proposed revenue hours for these "focus routes", and their percentage changes from pre-pandemic levels were compared to the rest of the Xpress system to determine if the major service change will result in different reductions and outcomes for minority and non-minority riders (Table A3).

As shown in Table A3, the focus routes in this analysis show a smaller percent reduction in service hours compared with the rest of the Xpress system, and they will retain more revenue hours, on average, as of July 2021. This finding corroborates that there is no disparate impact on minority riders due to the proposed major service changes.

Table A2: Identification of Xpress routes that exceed the systemwide average percentage of minority riders by 15 percentage points or more

Route	Percent minority riders	Exceeds 85.4% minority riders
476	74.0%	
480	62.1%	
442	92.5%	X
490	31.7%	
432	83.7%	
412	60.9%	
414	50.9%	
428	89.1%	X
483	38.3%	
400	61.5%	
431	74.2%	
416	63.1%	
453	50.4%	
441	93.3%	X
440	79.6%	
426	86.0%	X
413	50.9%	
410	66.1%	
401	57.5%	
417	68.8%	
419	80.2%	
463	71.3%	
411	38.5%	
430	80.3%	
423	92.1%	X
Systemwide average	70.4%	

Table A3: Service reductions for focus routes with high percentage of minority riders (>85.4%), compared with the rest of the Xpress system.

Route Grouping	Pre-COVID revenue hours	July 2021 revenue hours	Percent reduction
Sum of focus routes	91.89	56.13	38.9%
Sum of all other routes	323.09	180.77	44.0%
Systemwide Total	414.98	236.9	42.9%
Average of focus routes	18.4	11.2	39.6%
Average of other routes	16.2	9.0	43.8%
Systemwide average	16.60	9.48	42.9%

Appendix B: Detailed Results of Equity Analysis for Major Service Change, Low-Income Riders

For the purpose of analyzing the impacts of this proposed change, ridership from the 2018 Xpress On-Board Survey was used to analyze the impacts to low-income riders. Additionally, the major service change is based on all routes that were in service prior to the COVID-19 service change AND are currently in service. This resulted in a set of 25 routes (minus routes 484 and 485 that started service after the COVID-19 service change and routes 408 and 482 that were eliminated during the COVID-19 service change). Each of the 25 routes were evaluated for a minimum 25% service reduction with the service reduction based on the difference between revenue hours pre-COVID-19 service change and the projected revenue hours after the elimination of the COVID-19 service change (assumed to occur in July 2021). All the 25 routes exceeded the 25% service reduction (Table B1):

Table B1: Percent change of revenue hours for Xpress routes (pre- and post- major service change)

Route	Pre-COVID revenue hours	July 2021 revenue hours	Percent reduction
400	10.70	5.65	47.2%
401	6.92	4.45	35.7%
410	4.65	2.87	38.3%
411	15.02	10.62	29.3%
412	12.27	5.77	53.0%
413	13.48	8.25	38.8%
414	14.58	7.00	52.0%
416	14.27	7.90	44.6%
417	6.68	4.32	35.3%
419	28.48	18.78	34.1%
423	25.27	18.88	25.3%
426	34.63	21.07	39.2%
428	12.22	5.95	51.3%
430	18.00	12.73	29.3%
431	18.30	10.13	44.6%
432	21.33	9.78	54.1%
440	21.35	12.47	41.6%
441	12.12	7.05	41.8%
442	7.65	3.18	58.4%
453	22.78	12.75	44.0%
463	31.33	21.30	32.0%
476	27.58	10.05	63.6%
480	11.20	4.20	62.5%
483	15.07	7.92	47.4%
490	9.10	3.83	57.9%
Systemwide Total	414.9	236.9	42.9%
Average of Routes	16.60	9.48	42.9%

Because all routes are affected at the level of a major service change (greater than 25% reduction in revenue hours), all riders are also affected. Therefore, based on the definitions in ATL's Title VI equity analysis policy, there is no disproportionate burden for low-income riders.

Going deeper than the required analysis, Table B1 shows that some routes are impacted more than others by the proposed service changes. Additional analysis was conducted to identify any racial or income-based patterns. The ATL Title VI Policy sets thresholds for identifying disproportionate burden for low-income riders based on the proportion of low-income riders on particular routes. Xpress riders were categorized as low-income riders depending on responses in the onboard survey. Low-income riders were defined as any rider who indicated an annual household income less than \$40,000. Systemwide, Xpress ridership includes 13.7% low-income riders based on the 2018 Xpress On-Board Survey within the 25 routes described above. ATL's policy defines a disproportionate burden based on the proportion of low-income riders on affected routes, compared to the proportion of low-income riders in the system. A disproportionate burden is evident if affected routes have a percentage of low-income passengers at least 3 percentage points more than the ATL-operated Xpress average minority passenger distribution. Therefore, 3% was added to the 13.7% low-income ridership within the 25 routes. Routes with at least 16.7% low-income riders were identified for additional analysis associated with the major service change. Table B2 presents the low-income rider analysis, which identified eight routes for additional consideration.

The eight routes identified in Table B2 as having a higher-than-average percentage of low-income riders (442, 428, 431, 440, 441, 426, 419, and 423) were targeted for additional analysis. The proposed revenue hours for these "focus routes", and their percentage changes from pre-pandemic levels were compared to the rest of the Xpress system to determine if the major service change will result in different reductions and outcomes for low-income and non-low-income riders (Table B3).

As shown in Table B3, the focus routes in this analysis show a smaller percent reduction in service hours compared with the rest of the Xpress system, and they will retain more revenue hours, on average, as of July 2021. This finding corroborates that there is no disproportionate burden for low-income riders due to the proposed major service changes.


Table B2: Identification of Xpress routes that exceed the systemwide average percentage of low-income riders by 3 percentage points or more


Route	Percent low-income riders	Exceed 16.7%
476	13.2%	
480	9.7%	
442	37.1%	X
490	9.1%	
432	15.2%	
412	8.9%	
414	4.0%	
428	20.5%	X
483	4.4%	
400	6.1%	
431	18.0%	X
416	12.1%	
453	13.8%	
441	22.5%	X
440	17.8%	X
426	20.7%	X
413	13.5%	
410	1.8%	
401	3.6%	
417	10.0%	
419	19.5%	X
463	9.3%	
411	3.0%	
430	14.0%	
423	17.8%	X
Systemwide average	13.7%	

Table B3: Service reductions for focus routes with high percentage (>16.7%) of low-income riders, compared with the rest of the Xpress system.

Route Grouping	Pre-COVID revenue hours	July 2021 revenue hours	Percent reduction
Sum of focus routes	160.02	97.51	39.1%
Sum of all other routes	258.31	139.13	46.1%
Systemwide Total	414.98	236.9	42.9%
Average of focus routes	19.6	12.2	37.8%
Average of other routes	15.2	8.2	46.1%
Systemwide average	16.60	9.48	42.9%

Figure 11: Proposed Major service change - Presentation




A Regional Transit Operator within the **ATL** 

PROPOSED LEVEL OF SERVICE CHANGES

Gail Franklin
July 1, 2021

Background

- As a result of experiencing significant decreases in ridership due to the COVID-19 pandemic, Xpress implemented temporary service reductions
 - Routes were not eliminated but the number of trips were reduced on:
 - March 2020
 - April 2020
 - Further Service Changes were implemented (some increases/some decreases) in:
 - June 2020
 - August 2020
- On May 2021, staff advised the ATL Operations Committee of upcoming proposed service changes:
 - Proposed reset of the Level of Service (LOS) baseline as a result of the COVID-19 pandemic
 - Proposed elimination of service from Canton Park/Ride Lot stop on Route 490 due to safety concerns related to the City of Canton Construction Project (effective date of July 1, 2021)



18



Proposed Level of Service Changes

Route	Pre-COVID Trips (AM & PM)	Proposed Trip Eliminations		Service Level July 6, 2021 Trips (AM & PM)
		AM	PM	
400	7	7:00 / 7:20	5:10	4
401	6	6:25	5:25	4
410	8	6:10 / 7:35	4:40 / 6:10	4
411	11	6:00 / 6:30	5:10	8
412	12	6:25 / 7:05 / 7:55	4:20 / 5:20 / 5:50	6
413	11	6:05 / 7:05	3:40 / 4:40 / 6:00	6
414	10	8:20 / 8:35	2:45 / 4:10 / 6:55	5
416	12	5:45 / 7:00 / 7:30	3:45 / 4:45 / 6:05	6
417	6	5:30	5:30	4
419	22	5:30 / 6:25 / 8:00 / 8:15	3:30 / 4:00 / 5:45 / 6:15	14
423	17	6:00 / 6:30 / 7:50	6:00 / 6:30	12
426	30	6:10 / 6:25 / 6:45 / 7:15 / 7:25	3:00 / 3:55 / 4:15 / 4:40 / 5:05 / 6:20	19
428	8	5:40 / 7:15	4:10 / 6:20	4
430	16	5:20 / 7:10 / 8:05	4:20 / 6:10	11
431	14	6:25 / 7:45 / 8:15	3:30 / 4:20 / 5:30	8
432	20	5:50 / 6:45 / 7:15 / 8:00 / 8:30	3:55 / 4:30 / 4:50 / 5:40 / 6:10	10
440	18	6:30 / 7:25	3:30 / 4:35 / 6:15	8
441	10	6:00 / 7:30	4:20 / 7:00	6
442	9	6:20 / 7:25 / 8:00	3:30 / 4:30	4
453	15	6:15 / 6:45 / 7:30 / 8:00	3:30 / 4:30 / 5:45	8
463	22	5:55 / 6:24 / 7:15 / 8:00	3:57 / 4:21 / 5:35 / 6:00	14
476	18	5:45 / 6:20 / 6:50 / 7:25 / 7:55	3:30 / 4:15 / 4:45 / 5:20 / 5:50	8
480	10	6:10 / 7:15	4:30 / 5:45	6
485	14	5:30 / 7:15 / 7:35 / 8:10	3:45 / 4:25 / 5:05 / 5:45	6
490	8	7:00 / 7:25	5:10 / 5:40	4



Public Comments

- Formal public comment period for the proposed service changes was May 11, 2021 - June 11, 2021
- Public Hearing Date: May 25, 2021 (12:00PM-2:00PM and 6:00PM-8:00PM)
- Total Public Comments Received – 6
 - All comments pertained to the service level reductions
 - Comments were received on the following:
 1. Additional AM and PM Trip Requests
 2. Revise and expand schedule as businesses return to work
 3. Monitor service demand through 2021 and respond accordingly with additional service





Title VI Equity Analysis

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance.

- Based on the demographic analysis of riders who will be impacted by the proposed service changes, **the results indicate that the proposed service reductions will not result in a disproportionate burden to low-income riders, nor will the service reductions result in a disparate impact to minority riders.**



21



Goals

- Right size the current service based on known and anticipated ridership demands in the near term
- Temporarily eliminate the Canton Route 490 Stop due to safety concerns

Next Steps

- Recommendation for approval of the proposed service changes effective July 6, 2021 – Action Item
- Consideration for ATL Board approval on August 5, 2021
- Create and implement a Return to Ridership Campaign incl., strategic service increases over the next year



22



Xpress

Figure 12: Proposed Major service change Resolution, ATL Board of Directors

DocuSign Envelope ID: 891F9D89-569C-4AB1-BE13-1DB83E9E7894

**Resolution of the
Atlanta-region Transit Link Authority
Adopting the ATL Xpress Proposed Service Changes**

Resolution # 2021.08.05.02

WHEREAS, as a result of experiencing significant decreases in ridership due to the COVID-19 pandemic, the Atlanta-region Transit link Authority ("ATL") implemented temporary changes in the Level of Service (LOS) in response to the pandemic;

WHEREAS, due to the prolonged impact of COVID-19 on system ridership, ATL staff proposes to reduce service levels on 25 of Xpress' current routes;

WHEREAS, the proposed changes will reduce the revenue service hours for the 25 Xpress routes by more than 25%, relative to pre-COVID-19 levels, and therefore meet the definition of a major service change under the ATL's Title VI Policy;

WHEREAS, a formal public comment period was held for the proposed service changes between May 11, 2021 and June 11, 2021 with public hearings held May 25, 2021;

WHEREAS, all 6 comments that were received during this time were responded to and considered as part of this level of service change;

WHEREAS, based on the demographic analysis of riders who will be impacted by the proposed major service change, the results indicate that the proposed service reductions will not result in a disproportionate burden to low-income riders, nor will the service reductions result in a disparate impact to minority riders;

WHEREAS, ATL staff seeks board approval to make the proposed changes as listed on Attachment 1 to this Resolution permanent; and

WHEREAS, this implementation lays the foundation for the ATL to implement a service plan which provides for a level of service that is reflective of current ridership and efficient operations.

WHEREAS, due to safety concerns related to a City of Canton construction project, the ATL also eliminated the stop located at the Canton Park and Ride lot for Xpress Route 490;

WHEREAS, the ATL Xpress desires to make the LOS and the closure of the stop located at the Canton Park and Ride lot for Xpress Route 490 permanent for Xpress customers, effective as of July 6, 2021;

NOW, THEREFORE, BE IT RESOLVED that the ATL Board of Directors:

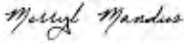
- 1) Approves the recommended changes to the existing *Xpress* service, as described in Attachment 1 to this Resolution; and
- 2) Authorizes the Executive Director to implement the recommended changes to the existing *Xpress* service, as described in Attachment 1 to this Resolution, in a manner consistent with federal and ATL service policies regarding standards, performance, Title VI, and public outreach requirements.

SO RESOLVED this 5th day of August 2021.


DocuSigned by:

Felicia Franklin
Vice Chair

APPROVED AS TO FORM:

DocuSigned by:

Meryll Mandus
Chief Legal Counsel

ATTEST:

DocuSigned by:

Jamie Harris
Board Secretary

Attachment 1

Route	Pre-COVID Trips (AM & PM)	Proposed Trip Eliminations		Service Level
		AM	PM	July 6, 2021 Trips (AM & PM)
400	7	7:00 / 7:20	5:10	4
401	6	6:25	5:25	4
410	8	6:10 / 7:35	4:40 / 6:10	4
411	11	6:00 / 6:50	5:10	8
412	12	6:25 / 7:05 / 7:55	4:20 / 5:20 / 5:50	6
413	11	6:05 / 7:05	3:40 / 4:40 / 6:00	6
414	10	8:20 / 8:35	2:45 / 4:10 / 6:55	5
416	12	5:45 / 7:00 / 7:30	3:45 / 4:45 / 6:05	6
417	6	5:30	5:30	4
419	22	5:30 / 6:25 / 8:00 / 8:15	3:30 / 4:00 / 5:45 / 6:15	14
423	17	6:00 / 6:30 / 7:50	6:00 / 6:30	12
426	30	6:10 / 6:25 / 6:45 / 7:15 / 7:25	3:00 / 3:55 / 4:15 / 4:40 / 5:05 / 6:20	19
428	8	5:40 / 7:15	4:10 / 6:20	4
490	16	5:20 / 7:30 / 8:05	4:20 / 6:10	11
431	14	6:25 / 7:45 / 8:15	3:30 / 4:20 / 5:30	8
432	20	5:50 / 6:45 / 7:15 / 8:00 / 8:30	3:55 / 4:30 / 4:50 / 5:40 / 6:10	10
440	13	6:30 / 7:25	3:50 / 4:35 / 6:15	8
441	10	6:00 / 7:30	4:20 / 7:00	6
442	9	6:20 / 7:05 / 8:00	3:30 / 4:30	4
453	15	6:15 / 6:45 / 7:30 / 8:00	3:30 / 4:20 / 5:45	8
463	22	5:55 / 6:24 / 7:15 / 8:00	3:57 / 4:21 / 5:35 / 6:00	14
476	18	5:45 / 6:20 / 6:50 / 7:25 / 7:55	3:30 / 4:15 / 4:45 / 5:20 / 5:50	8
480	10	6:10 / 7:15	4:30 / 5:45	6
483	14	5:30 / 7:15 / 7:35 / 8:10	3:45 / 4:25 / 5:05 / 5:45	6
490	8	7:00 / 7:25	5:10 / 5:40	4

Stop Elimination – Canton Road Park & Ride Stop on Xpress Route 490