



ATLANTA REGIONAL COMMISSION

**A RESOLUTION ADOPTING THE ATLANTA REGION COMMISSION'S
2016 TITLE VI PROGRAM & PLAN**

WHEREAS, the Atlanta Regional Commission, pursuant to the Georgia Code Section 50-8-80 et seq., is the agency responsible for comprehensive regional planning, including transportation and land use planning for the ten-county Atlanta Region; and

WHEREAS, the Atlanta Regional Commission is the designated Metropolitan Planning Organization (MPO) for transportation planning in the Atlanta Metropolitan Planning Area which includes all or parts of twenty counties; and

WHEREAS, to fund its many work activities, ARC receives direct or pass-through federal funding from agencies such as the US Department of Transportation (Federal Highway Administration and Federal Transit Administration); the US Department of Health & Human Services (US DHHS); and the US Department of Labor; and

WHEREAS, as a recipient of federal funds, ARC is required to comply with the requirements of Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin, specifically 42 USC 2000d, which states 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; and

WHEREAS, ARC must also comply with the additional protections set forth in Presidential Executive Order 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) and Presidential Executive Order 13166 (*Improving Access To Services For Persons With Limited English Proficiency*); and

WHEREAS, in 2013, ARC did develop and adopt an expanded Title VI Plan & Program as required by the Federal Transit Administration, and in August 2012, ARC did develop and adopt a Limited English Proficiency Plan, and ARC adopted an updated transportation participation plan, the Regional Community Engagement Plan in 2014; and

WHEREAS, the 2016 Title VI Program & Plan has been reviewed and approved through the Atlanta Metropolitan Planning Organization.

NOW, THEREFORE, BE IT RESOLVED that the Atlanta Regional Commission certifies compliance with policies, procedures and plans with regard to Title VI of the Civil Rights Act of 1964 (as amended) and additional Assurances as required and hereby adopts its 2016 Title VI Program & Plan; and

BE IT FURTHER RESOLVED that the Atlanta Regional Commission directs staff to begin efforts immediately to implement the provisions of the 2016 Title VI Program & Plan.

I do hereby certify that the foregoing resolution was adopted by the Atlanta Regional Commission on October 26, 2016.



Robin L. Rutherford, ARC Executive Assistant/Board Secretary



Title VI Plan



Atlanta Regional Commission



Effective December 1, 2016



ARC

Title VI Plan For the Atlanta Regional Commission



As a recipient of federal funds from the U.S. Department of Transportation and in accordance with the requirements of Title VI of the Civil Rights Act of 1964, ARC has developed this ARC Title VI Plan. ARC is committed to acting with the highest level of integrity and responsibility to ensure that all activities conducted by ARC, regardless of the source of funding, are without discriminatory intent, purpose, action, or result.

Non-Discrimination Policy Statement

It is the policy of the Atlanta Regional Commission that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the Atlanta Regional Commission as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the Atlanta Regional Commission, including its contractors and anyone who acts on behalf of the Atlanta Regional Commission. This policy also applies to the operations of any department or agency to which the Atlanta Regional Commission extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.


Executive Director


Date

1. Title VI and FTA/FHWA Objectives

Title VI states: No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.¹ Under Title VI, FTA/FHWA have the following objectives:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- C. Promote the full and fair participation of all affected populations in transportation decision making;
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- E. Ensure meaningful access to programs and activities by persons with limited English proficiency.²

¹ 42 U.S.C § 2000d, *et seq*
² Chapter II, Page II-1

2. FTA/FHWA General Requirements and Guidance

A. Provide annual Title VI certifications and assurances

The Atlanta Regional Commission (ARC) has submitted its FY 2016 Certifications and Assurances as required via TrAMS and will continue to update certifications annually.

B. Staff Responsibility for Title VI and Title VI Training

The Executive Director of the Atlanta Regional Commission is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21. The Executive Director has designated the following as Title VI Officers who have direct access to the Executive Director:

Mr. I. Emerson Bryan
Title VI Coordinator
Deputy Executive Director
Atlanta Regional Commission
40 Courtland St., NE
Atlanta, GA 30303
Phone: 404-463-3120
ebryan@atlantaregional.com

Ms. Brittany Zwald
Contracts and Grants Analyst
Atlanta Regional Commission
40 Courtland St., NE
Atlanta, GA 30303
Phone: 404-463-3162
bzwald@atlantaregional.com

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and any reports on ARC's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to GDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;

Title VI Plan For the Atlanta Regional Commission



- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

ARC is committed to devoting time during agency-wide staff meetings (each year) to remind staff of Title VI requirements and the appropriate steps to follow in responding to complaints. The Title VI Coordinator is in the process of developing staff and sub-recipient training programs for Title VI.

C. Develop Title VI complaint procedures

ARC has developed Title VI Complaint Procedures which are provided below.

Atlanta Regional Commission Title VI Complaint Process

I. Purpose

The Atlanta Regional Commission's complaint process covers complaints filed by an individual or group of individuals under Title VI of the Civil Rights Act of 1964, relating to any planning process, program or activity administered by the Atlanta Regional Commission. The process does not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel.

II. Definitions

Title VI of the Civil Rights Act of 1964: No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Complaint: Any verbal or written communication received by the Office of the Director from members of the public referencing a general complaint regarding the inequitable distribution of benefits, services, amenities, programs or activities financed in whole or in part with federal funds is perceived as an informal charge. A complaint is further defined as any written complaint by an individual or group seeking to remedy perceived discrimination by policies, practices or decisions, which have an adverse impact resulting in inequitable distribution of benefits, services, amenities, programs or activities financed in whole or in part with federal funds.

III. Responsibility

The Executive Director of the Atlanta Regional Commission is responsible for Title VI and has designated Mr. I. Emerson Bryan, Deputy Executive Director as the Title VI Coordinator.

It is the official policy of the Atlanta Regional Commission to minimize potential complaints through the following:

- The Atlanta Region's Plan, 2016;
- The Regional Community Engagement Plan, an updated transportation public participation plan, adopted by the ARC in 2014;
- The Stakeholder Engagement Plan, 2015/2016; and,
- Implementation of procedures and guidelines for ARC's planning and participation processes in accordance with policies, including:

- Public notice of review and comment period through a legal organ, the ARC website, media advisories and extensive mailing lists;
- Reasonable opportunity for review and comment inclusive of a 30-day review and comment period;
- Comment documentation and distribution to policy makers and the general public;
- Opportunities for citizens to participate through focus groups, listening sessions, task forces and planning teams;
- A formal ARC committee structure for approvals and recommendations: Transportation Coordinating Committee, Transportation and Air Quality Committee and ARC Board;
- Opportunities for oral and written comment by email, social media, survey responses, fax, phone calls, regular mail, telephone conversation, public hearings or face-to-face conversations; and,
- A participation evaluation process to assess the effectiveness of public outreach activities.

Supporting documents for the above may be obtained from ARC's Information Office, 404-463-3102.

IV. Intake and Processing

- Any ARC employee may receive a verbal or written communication of a concern and shall direct the complainant to report the concern directly to one of ARC's designated Title VI Officers. Contact information is provided on ARC's website.
- All complaints will be assigned a tracking number upon completion of the complaint form.

- An investigation will occur unless there is omission of facts which could establish intentional unequal treatment or the complainant is not a primary beneficiary of the federal funding received by ARC.
- If a determination is made that the matter is outside the scope of Title VI, notification will be provided complainant in writing within 10 working days of receipt of complaint.
- If the matter is determined to be within the scope of Title VI, the Title VI Officer will notify the complainant and begin an investigation within 10 working days of receipt of the complaint.

V. *Investigation, Determination and Recommendation*

- The Title VI Officer, in consultation with the affected department, will conduct an investigation inclusive of the following steps: the basis of the alleged unequal treatment; ascertain when and where the alleged unequal treatment occurred; identify and interview all relevant parties, review documents; and obtain other factual information from appropriate sources.
- A record of all discussions will be maintained and documents relating to the investigation retained in a confidential file by Title VI Officials.
- Based upon conclusion of a thorough investigation, a report will be prepared summarizing findings and suggesting appropriate corrective action, along with a proposed resolution.
- The investigation will be conducted and completed within 60 days of the receipt of the formal complaint.
- The investigative report will be submitted to the ARC Executive Director.

VI. *Communications of Findings and Complaint Resolution*

- The Executive Director of the Atlanta Regional Commission will accept, reject, or modify the investigative report.

Title VI Plan For the Atlanta Regional Commission



- Written notification will be provided to the complainant of the findings and proposed resolution within 30 days.

VII. Appeal

The complainant may appeal to the Executive Committee of the Atlanta Regional Commission.



TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act 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."

Please provide the following information, necessary in order to process your complaint.
Assistance is available upon request

Complainant's Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Home Telephone No.: _____ Work Telephone No.: _____

E-Mail address _____

Person discriminated against, if not complainant:

Name: _____

Address: _____

City: _____ State: _____ Zip Code _____

Home Telephone No.: _____ Work Telephone No.: _____

Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons, if any, were treated differently than you. You may attach any written materials or other information that you think relevant.

Date of Alleged Incident: _____

Are there any witnesses? Yes No

If so, please provide their contact information:

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone No.: _____

**Title VI Plan
For the Atlanta Regional Commission**



Name: _____
Street Address: _____
City: _____ State: _____ Zip Code: _____
Telephone No.: _____

Did you file this complaint with another federal, state or local agency; or with a federal or state court?

Yes No

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

- State Court
- Federal Court
- Local Agency
- State Agency
- Federal Agency
- Other

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

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

Date Filed: _____

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

Complainant's Signature _____ Date _____

Please mail this form to:
Atlanta Regional Commission
Title VI Officer
Office of the Director
Atlanta Regional Commission
40 Courtland St. NE.
Atlanta, Georgia 30303

D. Record Title VI Investigations, Complaints or Lawsuits

During the current period of 2012-2015, to date, ARC received 3 complaints or lawsuits brought against ARC or its sub-recipients by entities that alleged discrimination on the basis of race, color, or national origin. See Attachment 1.1: Title VI Complaints for the Period 2012-2015, with Disposition.

E. Provide meaningful access to services by Limited English Proficient (LEP) persons

ARC has developed a LEP Plan pursuant to the requirements of Executive Order 13166 and Title VI. The LEP Plan is provided in Attachment 1.2. A summary of ARC's LEP plan is provided below.

I. Background and Purpose

The purpose of Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964 is to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. This executive order states that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited English proficient or "LEP."

Title VI and Executive Order 13166 requires Federal departments and agencies to develop and make available guidance on how recipients of Federal funds should assess and address the needs of LEP individuals seeking assistance.

The U.S. Department of Transportation (DOT) developed guidance titled “A Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons”. This guidance was issued to ensure that persons in the United States are not excluded from participation in DOT-assisted programs and activities simply because they face challenges communicating in English.

II. Limited English Proficiency (LEP) Plan Development

As a recipient of federal funding, the ARC has taken reasonable of steps to ensure meaningful access to the planning process, information and services it provides. The LEP plan includes elements to ensure that LEP individuals have access to the planning process and published information. ARC will also work toward ensuring the production of multilingual publications and documents and/or interpretation at meetings/events when needed. The jurisdictional boundaries addressed will focus, although not exclusively, on the 20-county area designated as the Atlanta MPO.

III. Determining the Need

In developing the LEP Plan, ARC used the Four Factor LEP analysis, which considers the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by ARC programs, activities or services in the 20-county metropolitan planning area;
2. The frequency with which LEP individuals come in contact with ARC programs, activities or services;
3. The nature and importance of the program, activity or service provided to the LEP population; and,
4. The resources available to ARC and overall cost to provide assistance

Below is a summary of ARC's four factor analysis. See Attachment 1.2 for a full discussion of ARC's four factor analysis.

FACTOR 1: Number or proportion of LEP persons eligible to be served or likely to encounter ARC programs, activities, or services.

The U.S. Census Bureau's American Community Survey (ACS), 2006-2010, was the major data source used to determine the number of LEP persons in the 20-county metropolitan planning area. Consistent with the Safe Harbor Clause of the LEP guidance, these data also determined language groups that equal or exceed five percent of the regional population that are LEP.

The 20-county metropolitan planning area has a total population of 4,831,599 persons five years old and older. Of this total, the Census estimates that 366,317, or 7.6 percent of the region's population, are LEP. Gwinnett County accounts for the largest group of LEP persons in the region, 115,161, or 31.4 percent, of the LEP population in the 20-county region, followed by DeKalb County, 60,473 or 16.5 percent, Fulton County 53,754 or 14.7 percent and Cobb County, 49,754 or 13.6 percent.

FACTOR 2: Frequency with which LEP individuals come in contact with programs, activities, or services.

The ARC assesses the frequency of contact with LEP persons by documenting phone inquiries and surveying public meeting attendees. The MPO received no requests in 2014-2015 for language assistance from individuals or groups. It is anticipated that the size of the LEP population will continue to increase and, as a result, so will the probability of future contact with ARC. As the program expands, ARC will continue to monitor requests for language assistance to evaluate the effectiveness of outreach to these populations.

There are other internal and external options for ARC to utilize in assessing frequency of contact that potentially provide valuable information for future planning efforts. Examples include:

- The Poverty, Equity, Opportunity Committee, the Community Engagement Network (CEN) and roughly 19 other ARC task forces and subcommittees providing planning support related to public land use and transportation-related issues;
- ARC planning studies and projects;
- An extensive community engagement and reporting process;
- Services and programs receiving inquiries for services such as AgeWise Connection and RideShare;
- Coordination with planning partners such as the Georgia Department of Transportation, MARTA, GRTA, county and other jurisdictional entities; and,
- Coordination with community partners such as the Center for Pan Asian Community Services, Latin American Association and others.

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

ARC has analyzed programs and services based on ARC's function as MPO for the 20-county planning area to determine their value and importance to the LEP population. As in Factor 2, the internal assessment extended beyond responsibilities for carrying out the metropolitan transportation planning process to include those involving all functional divisions within the organization. This is consistent with ARC's coordinated agency-wide approach to planning.

Based on the assessments described in Factor 2 and 3, it was determined that the following should be considered vital MPO documents.

- Regional Transportation Plan (RTP).
- Transportation Improvement Program (TIP)

- Unified Planning Work Program
- Coordinated Human Services Transportation Plan (HST)
- Regional Community Engagement Plan (PDF)
- Policy for Citizen Input

All or parts of vital documents or notices with a direct impact on populations representing the primary language groups analyzed should be considered for translation.

Externally, ARC has ongoing contacts and working relationships with organizations serving areas with large concentrations of LEP persons. Organizations such as the Latin American Association, the Center for Pan Asian Services are available to provide valuable insights in identifying critical programs. These and other organizations and community groups that work with Spanish, Korean, Vietnamese, Chinese and other languages will be called upon to assist in the coordination of vital documents requiring translation services.

FACTOR 4: Resources available to and overall costs to provide LEP assistance.

Assessing availability of ARC resources to provide assistance to LEP persons is an ongoing activity. A major area of assistance often needed is the translation of ARC planning documents into other languages. ARC seeks to ensure that it has at its disposal staff and volunteer language interpreters, the cost for paid professional interpreter and translation services, and a process for identifying appropriate documents for translation. Typically, translation is priced as a per-word cost, based on the number of words in the original source content. For professional translation via a translation agency, costs may vary, depending on the language, turnaround times and specialized content. ARC is committed to providing professional and cost-effective language services.

Title VI Plan For the Atlanta Regional Commission



A staff survey was conducted in the past to identify languages, other than English, spoken by ARC staff. From this listing, volunteer translators and interpreters are identified by language and level of proficiency. It is expected that language resources within ARC will be expanded during the next survey.

ARC's LEP Plan further addresses required elements of:

- How to Identify a LEP Person who Needs Language Assistance
- Language Assistance Measures
- Staff Training
- Providing Notice of Available Language Services to LEP Persons
- Monitoring and Updating the LEP Plan
- Dissemination of the Limited English Proficiency Plan

Please see Attachment 1.2 for additional details.

F. Notify beneficiaries of their rights under Title VI

ARC posts its Title VI Statement on its website and in its written materials that ARC operates without regard to race, color, gender or national origin. See <http://www.atlantaregional.com/about-us/title-vi-compliance>.

ARC makes this statement available to its sub-recipients, given that they may adopt ARC's notice.

G. Ensure inclusive public participation

ARC engages in an extensive public participation process. Through its community engagement process, ARC seeks to provide an engagement process that facilitates identification of community values, development of policies and implementation of plans that matter to residents and communities, ensuring competitive advantage and preserving long-term sustainability. (See Attachment 1.3, ARC Regional Community Engagement Plan.) ARC takes numerous steps to engage low-income, minority, LEP and disabled persons in its community engagement and public participation process, taking into account the specific needs and characteristics of these groups. ARC's activities are discussed below into five categories of activity:

- I. Diversity (board/committee representation)
- II. Identification (of minority and LEP community to target for outreach)
- III. Engagement
- IV. Accessibility (location, language)
- V. Reporting (efforts, activities, outcomes)

I. Diversity—Ensure diverse representation on ARC board and ARC committees

The Board of the Atlanta Regional Commission includes both elected officials and appointed citizen members. All members of the Commission, regardless of their race or gender, represent all persons in their community. Thirty-nine members comprise the ARC Board - 23 local elected officials, 15 private citizens and one non-voting representative of the Georgia Department of Community Affairs. The table below provides a breakdown of minority representation in the regional decision-making process:

**Title VI Plan
For the Atlanta Regional Commission**



Committee/Board	Total	Minority		Female	
		Count	Percentage	Count	Percentage
TCC, including alternates	55	10	18%	12	22%
TAQC—nonelected	11	1	9%	3	27%
TAQC—elected	22	6	27%	4	18%
ARC—nonelected	15	4	27%	3	20%
ARC—elected	23	7	30%	3	13%

Source: ARC

II. Identification—Establish criteria to determine low-income, minority and LEP persons/communities to target for outreach

ARC seeks to target several stakeholders in its planning activities. ARC’s stakeholder groups provide access to low-income, minority and LEP persons/communities. These stakeholder groups include:

- ARC Board and Committees
- Local Governments
- State legislators
- Chambers of Commerce and other business organizations
- Population focused
- Advocacy
- Religious
- Educational institutions
- Metropolitan Planning Organization (MPO) interested parties
- Targeted private/public professional organizations
- Citizens groups
- Neighborhoods

- General Public

ARC also develops Equitable Target Area (ETA) Maps in order to identify the areas of concentration of low-income, minority and LEP persons. Additionally, ARC also maintains a database containing the names and addresses of several thousand Atlanta Region residents, including low income communities, minority communities and disabled communities, who receive periodic mailings related to the planning process.

III. Engagement—Develop techniques to engage low-income, minority and LEP Persons in discussions on transportation planning efforts

ARC utilized several techniques to engage low-income, minority and LEP persons in ARC transportation planning activities. Below is a summary of the techniques that have been utilized by ARC:

- Publish notices of public meetings and information on transportation planning activities in major media and media targeted to minority communities, such as the Atlanta Daily World, several Hispanic publications including Mundo Hispanico, several Asian publications, including the Korean News Daily, the Samachar, and the Chinese Daily World, as well as the Atlanta Inquirer and WRFG Radio;
- Form special committees and partnerships to assist ARC to outreach to the targeted communities, such as Poverty, Equity and Opportunity Committee, the Building Opportunity Workshop series, Partnership for Southern Equity, Georgia Standup, Older Drivers Task Force, Asian American Resource Center, Women’s Advisory Leadership Council, Schools and Communities forum, Human Services Transportation steering committee, Cobb and MARTA Transit Advisory Boards (and Accessibility boards), Aging Services Advisory Committee, Coalition for the People’s Agenda, Coalition of Black Women, NAACP, 100 Black Men, Civic League Neighborhood

- Forum, AHAND and Regional housing stakeholders, the Clark Atlanta Transportation Institute (high school students);
- Host public meetings and sessions throughout the region customized and presented to specific audiences.
 - During this reporting period, ARC made significant efforts to engage targeted groups through its Building Opportunity Workshop Series, which brought together community leaders, representatives from equity groups and others to provide input on issues related to equity and policy in the Atlanta region. 4 workshops were held:
 - ▣ A Conversation on Poverty and Transportation Access in Metro Atlanta;
 - ▣ Livability Through an Equitable Lens
 - ▣ Economic Opportunity: The State of the South
 - ▣ Community Voices in Planning
 - ARC also reached out to targeted groups through its:
 - ▣ Community Policy Discussion Groups, which brought together community groups that advocate on behalf of ethnic minorities and special interest/advocacy groups;
 - ▣ Online survey series, reaching 16,500 participants;
 - ▣ Metro Atlanta Speaks Survey, which included more than 6,300 participants; and,
 - ▣ Millennial Advisory Panel, focusing on including the perspectives and opinions of young people ages 18-35.
 - ARC continues to participate in functions and events targeted to low-income, minority and LEP persons, such as Clark-Atlanta University Transportation Institute day;
 - Participate in speaking engagements on transportation issues targeted to diverse groups throughout the region.
 - Attend community events, such as The Neighborhood Summit, Together Empowering Asians Tea Walk, festivals, discussions, and more.

- Develop informational packages targeted to low-income, minority and LEP persons, such as community outreach flyers, plan brochures, digital newsletters, blog posts and PowerPoint presentations.
- Ensure all Board and Committee meetings are open to the public, including Transportation Coordinating Committee (TCC) and Transportation & Air Quality Committee (TAQC) meetings.
- Utilize Media and ARC's Web Page to communicate ARC's work and regional plans, including the Atlanta Region's Plan, invitations to planned meetings, and solicit input from the general public.

Activities in which ARC has been engaged for the period FY 2012 through FY 2015 as it relates to public participation targeted to low-income, minority and LEP persons is provided in Attachment 1.4.

IV. Accessibility

IV.1 Identify locations, facilities and meeting times that are accessible to low-income, minority and LEP Persons

Utilizing ETA maps and input from ARC's community partners, ARC attempts to identify locations within diverse communities that are accessible to all groups. Particular focus will be given to ensuring that locations promote comfort and trust by participants to speak openly and candidly and timeframes facilitate maximum participation. As part of its Community Engagement Plan, ARC commits to designing "a community engagement strategy that incorporates a complementary mix of smaller, community-based forums, large-scale public forms and online opportunities for engagement".

Title VI Plan For the Atlanta Regional Commission



IV.2 Conduct sessions in languages other than English and develop criteria to determine when translation services are required, including accommodations for the hearing-impaired.

ARC translates key plans and documents into Spanish, and in some cases, Korean, Vietnamese and Chinese, as needed or requested. ARC has the capacity to translate documents into the following languages on an as needed basis: Afrikaans, Arabic, Chinese, French, German, Haitian Creole, Korean, Swahili, and Vietnamese. Other measures to determine when translation services are needed or will be performed are identified in the LEP Plan in Attachment 1.2.

VI. Reporting

VI.1 Provide reports that reflect ARC achievement of its efforts to outreach to low-income, minority, and LEP persons.

Currently, ARC reports information related to equity and inclusion in various plans, reports and on its website:

- ARC includes a discussion of the outcomes of its outreach efforts in various documents, such as the Stakeholder Engagement Plan and the evaluation reports specific to outreach for The Atlanta Region's Plan.
- ARC responds to the Annual Title VI Questions for MPOs.
- ARC includes Equity and Inclusion information in various sections of its website, including within the Transportation Community Engagement section, the Poverty, Equity, Opportunity Committee page, as well as the New Voices and the Atlanta Region's Plan microsites.
- ARC also reports its activities as it relates to low-income, minority and LEP persons in quarterly Section 5303 reports.

VI.2. Provide anecdotal summaries of community engagement sessions and/or survey results targeted to low-income, minority and LEP persons

ARC provided survey results of comments and concerns made by community members in a series of online surveys, a telephone survey, several focus groups and the Building Opportunity Workshops series, particularly those representing low-income, minority and LEP persons. Results frequently identified the race, gender, age, and geographic location of the survey participants. Income levels were not requested, however some survey questions allowed ARC to determine whether the respondent lived in an ETA.

H. Provide additional information upon request

ARC will provide any additional information requested by FTA or FHWA for the purposes of determining whether ARC is in compliance with Title VI requirements.

I. Prepare and Submit Title VI program

ARC is submitting this Title VI program consistent with FTA and FHWA requirements. ARC will submit its next Title VI program in 2019.

3. Program-Specific Requirements and Guidelines for State Departments of Transportation or Other Administering Agencies

The Fixing America's Surface Transportation (FAST) Act was enacted in December 2015. This legislation affects how ARC meets regulations for transportation funding directed towards target populations such as 1) individuals with disabilities, 2) older adults, and 3) individuals with low income. This approach of meeting the needs of these 3 target populations has been referred to as Human Services Transportation (HST). HST became a common reference with The Safe, Affordable, Flexible, and Efficient Transportation Equity Act – A Legacy for Users (SAFETEA–LU). This legislation was in place August 2005 through September 2009, afterwards extended through June/July of 2012.

SAFETEA–LU authorized funding for transportation and required that projects funded from the Elderly Individuals and Individuals with Disabilities (Section 5310), Job Access and Reverse Commute (JARC, Section 5316), and New Freedom (NF, Section 5317) programs be derived from a locally developed, coordinated public transit-human services transportation plan (“coordinated plan”). Since then, ARC has produced a number of HST Plans to meet these requirements. The first plan was completed in 2007, the second in 2010, the third in 2013, and the latest draft plan is currently under review for 2016. The current plan (2013) along with past plans are available online at:

[www.atlantaregional.com/transportation/human-services-transportation/
coordinated-hst-plan.](http://www.atlantaregional.com/transportation/human-services-transportation/coordinated-hst-plan)

Since the 2016 version is in draft form, it is not yet published online.

Moving Ahead for Progress in the 21st Century (MAP-21) was enacted in July 2012 and was in place until the FAST Act was enacted in December 2015. MAP-21 repealed Section 5316 and Section 5317. Section 5316 (JARC) type projects were folded into existing funding categories,

Title VI Plan For the Atlanta Regional Commission



Section 5307 and Section 5311 (see www.transit.dot.gov/funding/grants/grant-programs/job-access-and-reverse-commute-program-5316). Section 5317 (NF) type projects were folded into Section 5310 (see www.transit.dot.gov/funding/grants/enhanced-mobility-seniors-individuals-disabilities-section-5310). For Section 5307 and 5311, JARC-type project funding amounts and project types are now decided at the discretion of the local/regional level. The federal government does not require MPOs to explicitly demonstrate how and where these funds are spent. However, Section 5310 has absorbed NF-type projects in a more structured way. From the guidance at:

www.transit.dot.gov/sites/fta.dot.gov/files/5310_Enhanced_Mobility_of_Seniors_and_Disabled_Fact_Sheet.pdf,

“At least 55 percent of program funds must be used on capital or “traditional” (non NF) 5310 projects...The remaining 45 percent is for other “nontraditional” projects. Under MAP-21, the program was modified to include projects eligible under the former 5317 New Freedom program...” Section 5310 is now called ‘Enhanced Mobility of Seniors and Individuals with Disabilities Program’. ARC and the Georgia Department of Human Services (DHS) are joint designated recipients for Section 5310 – DHS for the “traditional” component, ARC for the “nontraditional” component. ARC’s Aging and Health Resources Division, also the Area Agency on Aging (AAA), oversees ARC’s competitive selection process for “nontraditional” 5310 projects in the Atlanta Urbanized Area.

The only place where requirements for a coordinated HST Plan are mentioned in FAST Act guidance is under the Section 5310 description at

www.federalregister.gov/articles/2016/02/16/2016-02821/notice-of-fta-transit-program-changes-authorized-funding-levels-and-implementation-of-federal-public#h-66.

It states the following:

The coordinated planning provision requires that all projects be included in the local coordinated human service-public transportation plan.

FTA requires the following elements, at a minimum, be included in the plans:

- I. An assessment of available services that identifies current transportation providers (public, private, and nonprofit);
- II. An assessment of transportation needs for individuals with disabilities and seniors;
- III. Strategies, activities, and/or projects to address the identified gaps between current services and needs, as well as opportunities to achieve efficiencies in service delivery; and,
- IV. Priorities for implementation based on resources (from multiple program sources), time, and feasibility for implementing specific strategies and/or activities identified.

Additionally, the plan must be developed and adopted with representation from seniors, individuals with disabilities, representatives of public, private, nonprofit transportation and human services providers, and other members of the public. Recipients must certify that projects were selected from this process and must make reference to the plan in the program of projects, which is described below.

All of ARC's HST plans – past, current, and draft (future) – meet all requirements laid out above. Past plans, such as the one updated in 2010, establishes HST coordination goals and objectives for the region and includes a list of FY 2009, 2010 and 2011 JARC and New Freedom funded projects. In 2012, ARC performed a limited technical update in order for the 2010 Coordinated Plan to be in sync with PLAN 2040. ARC updated the plan to incorporate 2010 census data, principles, values, and recommendations of PLAN 2040, key findings from the RHST, and implementation suggestions based on best practices. In 2016, ARC has drafted a new Human

Services Transportation Plan that focuses on a strategic, integrated approach to HST, as opposed to a purely tactical approach.

To comply with Title VI requirements regarding Section 5310 funds, ARC has developed compliance procedures in the following areas:

- Analysis Basis for Ensuring Compliance
- Program Administration
- Process for Monitoring of sub-recipients

A. Analytic Basis For Ensuring Compliance

Based on Title VI requirements and USDOT's Order on Environmental Justice, ARC maintains an analytic basis for certifying compliance with Title VI in order to integrate into ARC's planning activities. ARC's methodology is discussed below in Section 4.A.

Further, ARC is in the process of developing a new Human Services Transportation Plan, which takes a strategic approach to ensuring the inclusion and full integration of HST issues. This action has been necessitated to ensure that sub-recipients are adequately considering and planning for the needs of underserved populations. ARC's new strategic approach focuses on two components:

1. **Needs Assessment:** ARC has conducted a needs assessment to ensure that it can properly evaluate project options and funding strategies, as well as train sub-recipients, based on actual qualitative and quantitative data regarding the limitations on and challenges regarding the transit options for underserved populations.
2. **Targeted Improvements:** With the needs assessment in hand, ARC offers categories of tactics, that when deployed by sub-recipients, may be effective in addressing the

limitations and challenges outlined in the needs assessment. Tactics includes project strategies, collaborative requirements and funding options.

When the new strategic approach is overlaid with the tactical operations, ARC is positioned to work toward results and outcomes for the underserved populations, in a manner that is fully integrated in The Atlanta Region's Plan.

B. ARC Program Administration

ARC passes through Federal Transit Administration (FTA) funds under Section 5307/5310 - Enhanced Mobility of Seniors and Individuals with Disabilities Program without regard to race, color, or national origin and that minority populations are not being denied the benefits of or excluded from participation in these programs.

Below is a discussion of the methodology utilized by ARC to administer Section 5307/5310 funds.

Program Goals

FTA 5307 Low-Income Component (JARC)

The Atlanta Urbanized Area apportionment amounts for the 5307 program have increased, due to the merger of the JARC Program and the Urbanized Area Formula Program (5307 Low-Income Component) legislated in MAP-21. Consequently, there is no longer a requirement to dedicate any specific amount for JARC-related projects, as was the case when Section 5316 was in effect. Nonetheless, the Atlanta Regional Transit Operators Subcommittee (TOS)³ recommended that a portion of the overall Section 5307 Atlanta UZA apportionment amount continue to be set-aside, specifically for JARC-related projects and programs.

³ Refer to p. 23 of the 2016 Unified Planning Work Program (UPWP) for additional information regarding the Transit Operators Subcommittee.

Recipients of the regional 5307 Low-Income set-aside amount are required to present their proposed program of projects for the 5307 Low-Income component to the TOS, and demonstrate that the proposed program(s) is consistent with the federal goals and guidelines provided in FTA Circular 9030.1E (Urbanized Area Formula Program: Program Guidance and Application Instructions). Upon successful demonstration of consistency with the programmatic goals and guidelines, TOS makes a recommendation to sub-allocate the set-aside amount to the eligible recipients. In addition to the set-aside funding, JARC-related programs and projects are also funded by recipients' general sub-allocation amounts.

FTA 5310

The FTA Section 5310 program provides grant funds for capital and operating expenses to recipients for:

- Public transportation projects planned, designed, and carried out to meet the special needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable;
- Public transportation projects that exceed the requirements of the Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. 12101 et seq.);
- Public transportation projects that improve access to fixed-route service and decrease reliance on complementary paratransit; and
- Alternatives to public transportation projects that assist seniors and individuals with disabilities with transportation.

The Atlanta Regional Commission's overarching goal for FTA Section 5310 projects is to improve mobility for older adults and individuals with disabilities in the metro region through activities and projects that remove barriers to transportation services and expand mobility options. The

criteria for projects funded through Section 5310 are based on the priorities and recommendations from ARC's Human Services Transportation (HST) Plan.

Atlanta Region HST Goals

- Improve accessibility and mobility for seniors and persons with disabilities;
- Improve customer service for HST users; and,
- Promote effectiveness, efficiency, and coordination among transportation providers.

Eligibility Details

'Traditional' Projects

'Traditional' projects include public transportation projects planned, designed, and carried out to meet the needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable. Mobility Management projects are considered 'Traditional' projects under the FTA Section 5310 program. Mobility Management projects consist of several different types of activities, including the hiring of mobility manager staff positions and related program costs, the conducting of short range planning or demonstration projects and the use of technology such as scheduling software and hardware. Mobility Management projects are intended to build coordination among existing public transportation providers and other transportation service providers with the result of expanding the availability of service. The following types of applicants are eligible to apply for funding for 'Traditional' projects:

- A private non-profit organization with an administrative office located in a county within the Atlanta Urbanized Area;
- A state or local governmental authority in the Atlanta Urbanized Area that is approved by the State to coordinate services for seniors and persons with disabilities; or,

- A state or local governmental authority in the Atlanta Urbanized Area that certifies that there are no non-profit organizations readily available in the area to provide the service.

'New Freedom' Projects

'New Freedom' projects include those that exceed the ADA minimum requirements, improve access to fixed route service, decrease reliance by individuals with disabilities on ADA complementary paratransit service, or provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation. The following types of applicants are eligible to apply for funding for 'New Freedom' projects:

- A state or local governmental authority in the Atlanta Urbanized Area;
- A private non-profit organization with an administrative office located in a county within the Atlanta Urbanized Area; or,
- An operator of public transportation in the Atlanta Urbanized Area that receives a Section 5310 grant indirectly through a recipient.

A competitive request for proposals is issued by ARC as funds become available, an evaluation process is conducted by ARC's HST internal team, and awards are based on the quality of the applications submitted. The evaluation process involves ranking the degree to which the projects demonstrated effective approaches, had well-defined implementation plans, and exhibited cost effectiveness.

Proposal Evaluation Criteria

Organizational Capacity, Implementation Strategy, and Measures of Effectiveness

- The applicant has a service history and technical capability to carry out the proposed tasks in a timely and efficient manner;
- The proposed project contains a well-defined implementation plan; and,
- The proposed project's outcomes are specific and measurable.

Project Description

- The proposed project provides clear project details including eligibility, geographic coverage, operating procedures, trip type (if applicable), and unit costs (if applicable);
- The proposed project clearly describes how it will remove of barriers to transportation services, fill of gaps within existing transportation options available in the geographic area, and expand mobility options;
- The proposed project demonstrates coordination with existing transportation providers in the proposed geographic area including linkages with other transportation services to fill gaps in existing transportation infrastructure; and,
- The proposed project offers maximum flexibility in allowing consumers to travel when and where they desire to go.

Budget

- The applicant has demonstrated capability to carry out the proposed activities in a financially efficient manner wherein the costs per ride are reasonable compared to regional and national rates or reasons for higher rates are clearly explained;
- The applicant demonstrates long-term commitment and ability to sustain the proposed project beyond the grant period; and,
- The applicant clearly identifies and demonstrates capacity to provide required match funds.

C. ARC Process for Monitoring Sub-recipients

Title VI Plan For the Atlanta Regional Commission



Each sub-recipient is visited as least annually by an ARC Staff member or ARC representative to review the annual checklist. The annual checklist covers Title VI and other related federal compliance topics, and other topics such as the American with Disabilities Act, LEP Plans, Equal Employment Opportunity, DBE, Public participation and outreach.

Title VI – Civil Rights

Through contract agreements, sub-recipients agree to comply with all applicable civil rights statutes and regulations. These include Title VI of the Civil Rights Act, EEO, and the ADA.

Title VI – ARC signs the “FTA Annual List of Certifications and Assurances for FTA Grants and Cooperative Agreements. Each recipient must have a signed Title VI Assurance and FTA Civil Rights Assurance on file with ARC, or agree to follow ARC’s Title VI Program.

Title VI Public Notification of Rights – Sub-recipients are instructed to notify the public of their rights under Title VI Civil Rights. Notification takes place through notices posted on vehicles and (in transit facilities), on printed publicity materials and websites. ARC staff will verify the presence of public notification on the Annual Checklist.

Investigation of Complaints/Lawsuits – ARC gathers information from sub-recipients during the annual visits and any findings are documented.

ARC prepares a Title VI report for submission to the FTA every three years. Compliance with Title VI Civil Rights takes place through monitoring of complaints. When a complaint is deemed a civil rights issue it is referred to the ARC Title VI Officer.

Disadvantaged Business Enterprise (DBE) – Sub-recipients must sign a certification and assurance for fair and open third party contracting opportunities to include DBE companies.

Limited English Proficiency (LEP) populations – Assessment of need is made to determine if language assistance is necessary for participation in FTA programs or projects.

Americans with Disabilities – The ADA certification is required for compliance with ADA accessibility for FTA funded transit operations and capital projects and is signed by each sub-recipient.

Vehicle Maintenance, Use and Disposition – The sub-recipients vehicle maintenance program is monitored as a part of the annual on-site review, as is their use of vehicle(s), and the disposition policy and requirements of FTA before useful life expires.

Drug-Free Work Policy – Sub-recipients are required to provide proof of a “drug and Alcohol free Workplace Policy.” Only if the recipient receives other FTA funds, which requires random drug testing of sensitive employees, does this apply with sub-recipients of ARC funds.

D. ARC Process for Providing Assistance to Sub-recipients

ARC fully supports its sub-recipients to meet the requirements of Title VI through direct consultation, as well as by providing the following information:

- I. Sample notices to the public informing beneficiaries of their rights under Title VI and procedures on how to file a Title VI complaint.
- II. Sample procedures for tracking and investigating Title VI complaints filed with a sub-recipient.
- III. Demographic information on the race, income, and English proficiency of residents served by the sub-recipient.

E. Requirement to Prepare and Submit a Title VI Program

To ensure compliance with 49 CFR Section 21.9(b), ARC provides the following procedures.

- I. A copy of the procedures used for certifying that the statewide planning process complies with Title VI.

ARC is not responsible for the statewide planning process; as such this element is not applicable to ARC.

- II. A description of the procedures the agency uses to pass-through FTA financial assistance in a non-discriminatory manner.

See Section 3.B, ARC Program Administration above.

- III. A description of the procedures ARC uses to provide assistance to potential sub-recipients applying for funding in a non-discriminatory manner.

See Section 3.D, ARC Process for Providing Assistance to sub-recipients above.

- IV. A description of how ARC monitors its sub-recipients for compliance with Title VI and a summary of the results of this monitoring.

See Section 3.C, ARC Process for Monitoring Sub-recipients above.

4. Program-Specific Requirements for Metropolitan Planning Organizations

Title VI requires agencies to develop specific policies and procedures aimed at increasing the participation of low-income and minority persons in ARC's transportation planning activities. It further requires ARC to establish a process to maximize the benefits of and minimize the burdens of transportation investments on low-income and minority communities. Below is a discussion of ARC's efforts to address the inclusion of low-income and minority persons in the transportation planning process and in transportation investments.

A. Analytic Requirements to Ensure Compliance

Based on Title VI requirements and USDOT's Order on Environmental Justice, ARC maintains an analytic basis for certifying our compliance with Title VI in order to integrate into ARC's planning activities. ARC's basis addresses the three Title VI requirements below:

- I. A demographic profile of the metropolitan area that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI.
- II. A metropolitan transportation planning process that identifies the needs of low-income and minority populations. An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.
- III. An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.

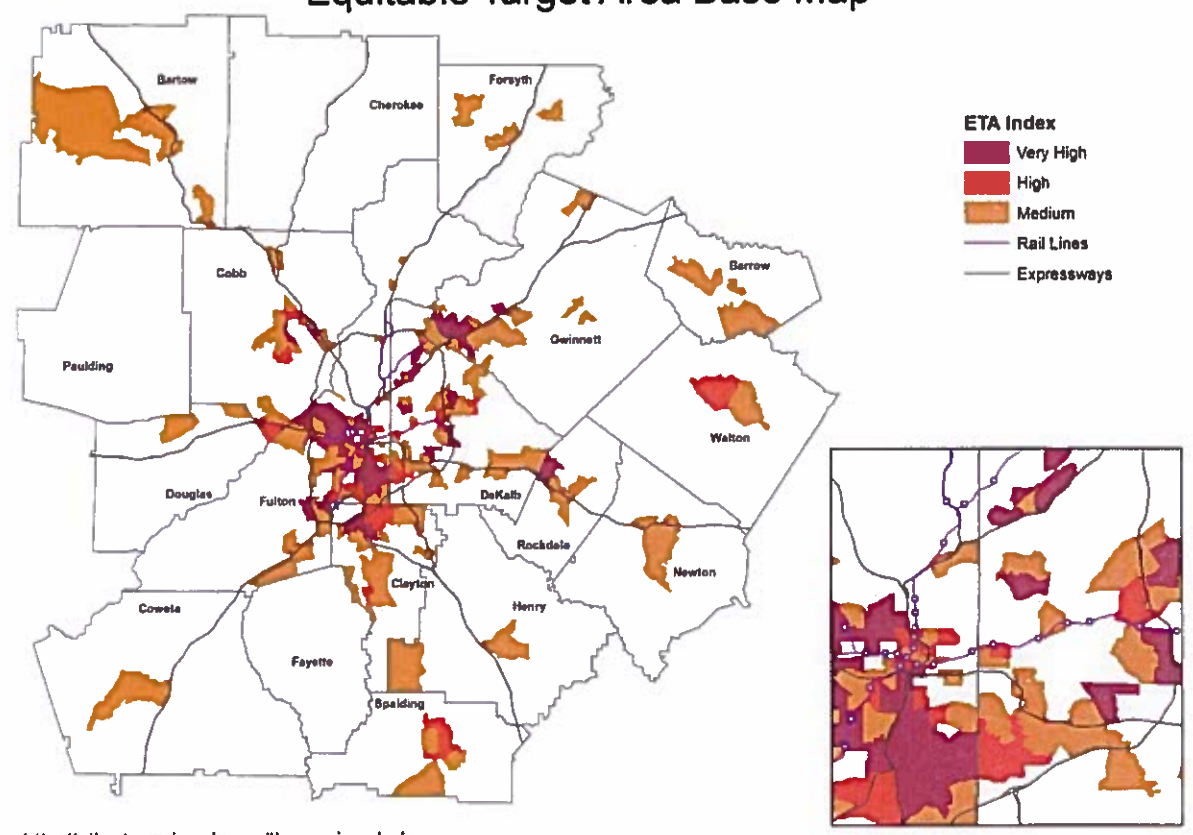
- I. A demographic profile of the metropolitan area that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI.*

ARC has developed Equitable Target Area (ETA) Maps, which identifies the locations of socioeconomic groups, including low-income and minority populations. Based on the maps provided below for the 20-county region, ARC makes the following observations:

- On average, 14.47 percent of the population lives below poverty. The highest concentration of poverty is in Spalding County (21.9 percent), followed by Clayton County (21.6 percent). The lowest concentration of poverty is in Fayette County (6.7 percent).
- Clayton County has the highest rate of minority populations at 85.9 percent, followed by DeKalb County (70.6 percent). The lowest concentration of minorities is in Cherokee County (18.7 percent).
- 15 out of 17 counties reported have minority populations over 20 percent. 9 out of 17 counties have minority populations over 40 percent. Overall, the minority population for the region averages 42.77 percent.
- The senior population in the region ranges from 6.6 percent (Clayton County) to 13.3 percent (Spalding County), for an average of 9.49 percent.
- Based on updated LEP statistics, the LEP population in the region ranges from 1.9 percent (Paulding and Spalding Counties) to 14.8 percent (Gwinnett County), for an average of 7.6 percent
- Over 48 percent of capital investments are located in or adjacent to ETA communities.

Equitable Target Areas Using Standard Deviation

Equitable Target Area Base Map

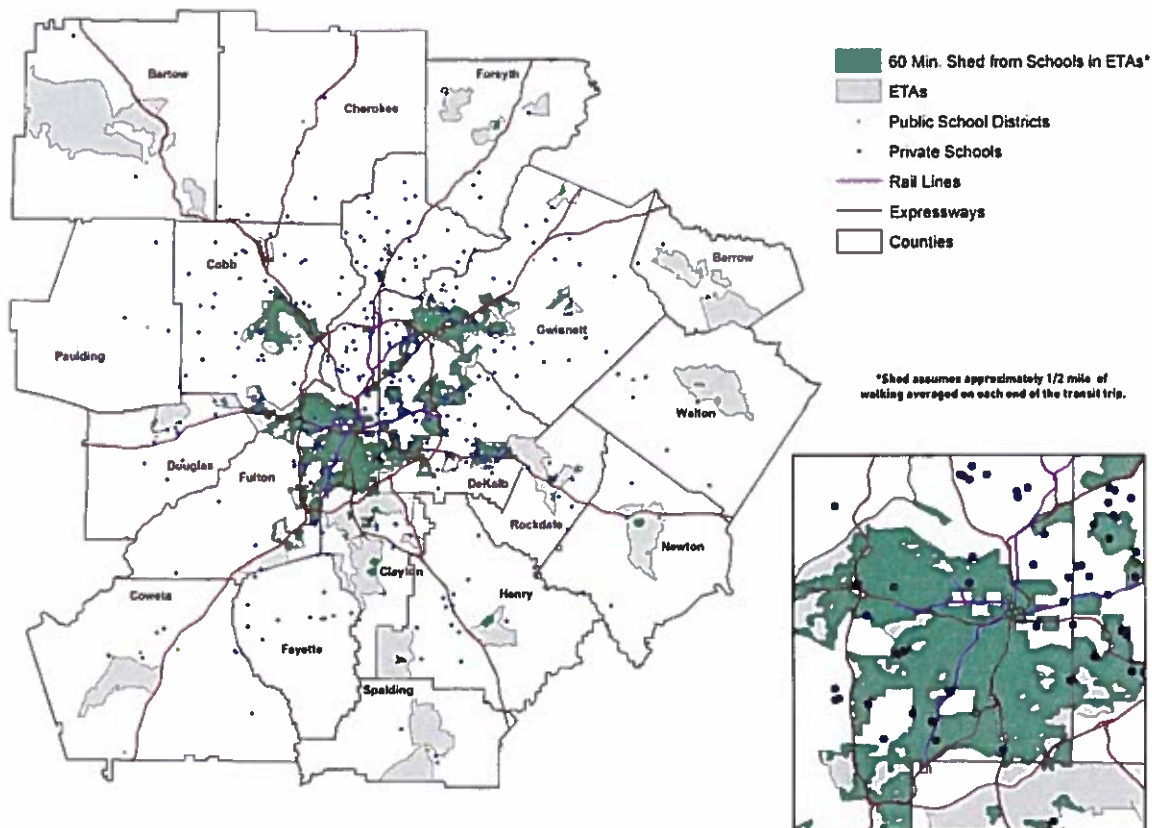


<http://atlantaregional.com/the-regional-plan>

Transit and Walking Travelsheds to K-12 Schools

Schools will typically be sited in close proximity to where people with children live. Although there are a handful of examples of new schools being located close to town centers, a trend has emerged in recent years of new schools being built in undeveloped areas with less expensive land to accommodate all grades on a single site and future growth. As this trend continues it may be increasingly challenging to access those schools by public transit, bicycling or walking.

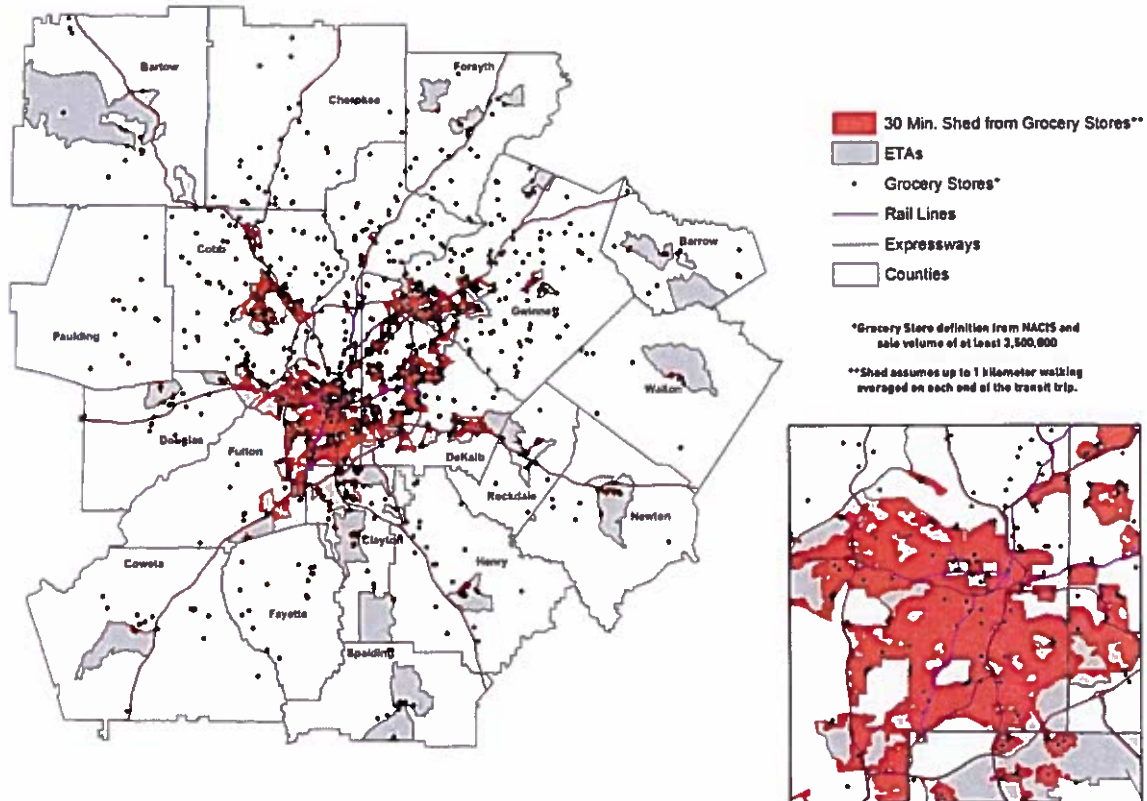
Grades K-12 Transit Travel Sheds



Transit and Walking Travelsheds to Grocery Stores

Grocery stores are much more widely scattered around the Region than the other essential services included in this analysis. Since many items purchased will be perishable, such as fresh fruits and vegetables or frozen items, a 30-minute maximum travel time was assumed rather than 60 minutes. This map would seem to indicate that levels of access are reasonably good, especially if one considers the possibility of trips completed entirely by walking, but it's likely that many facilities shown are not full-service grocery stores. Being able to purchase packaged and processed foods at a local convenience store is not the same as having the range of options afforded by a full-service grocery. In order to better determine the level of convenient access individuals living within ETA areas have to groceries, it will be necessary to refine this analysis and better differentiate between the services and products actually provided by each facility shown.

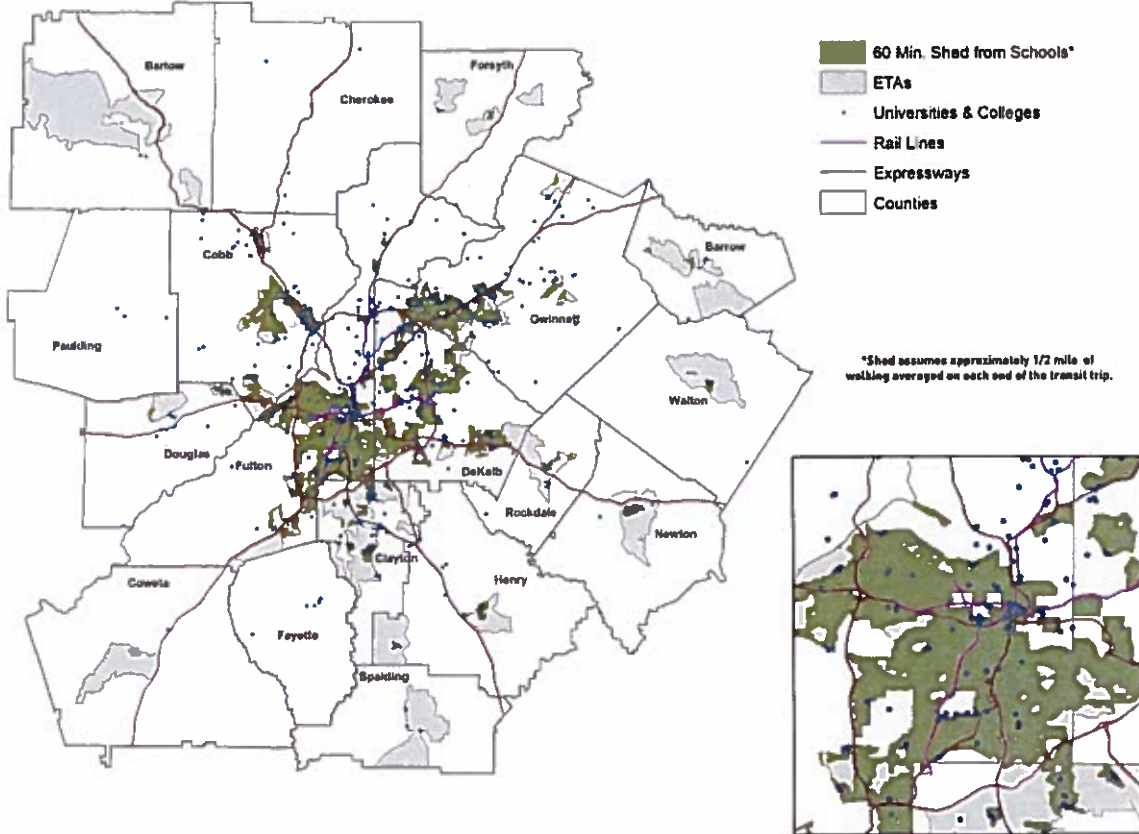
Grocery Store Walk and Transit Travel Sheds



Transit and Walking Travelsheds to Colleges and Technical Schools

It is particularly difficult to estimate a transit travel shed to higher education facilities because of their specialized nature. A person inside of a transit shed on this map may still not be able to get to the school they want to attend or have been accepted to. Travel surveys have a much higher accuracy of how students living in high poverty areas travel to school and where they attend classes. ARC has conducted an extensive travel survey in 2010 and has access to MARTA’s latest on-board ridership survey. These resources will be used to continue analyzing this aspect of accessibility.

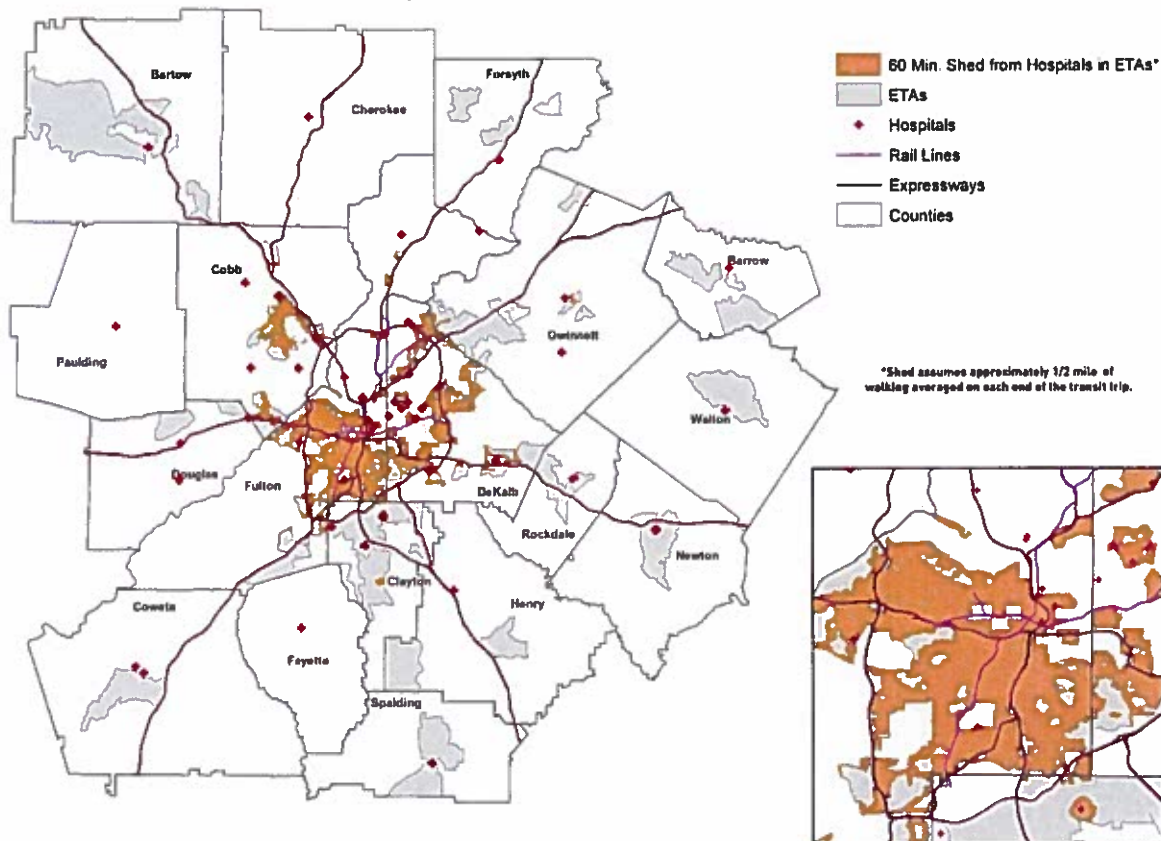
Equitable Target Area Accessibility to Higher Education



Transit and Walking Travelsheds to Hospitals

Many households in poverty have historically not had access to healthcare and have therefore have not had access to preventative care. As healthcare becomes more affordable, more individuals living in poverty will regularly have access to this service. Most clinics can handle basic healthcare, but some specialized needs still require frequent visits to full-service hospitals. However, without accurate information about which clinics and hospitals are most frequented by people in poverty, assumptions about access are impossible to make. ARC would like to partner with public health organizations to gather and share data to gain a better understanding of where our Region has gaps in access to healthcare services.

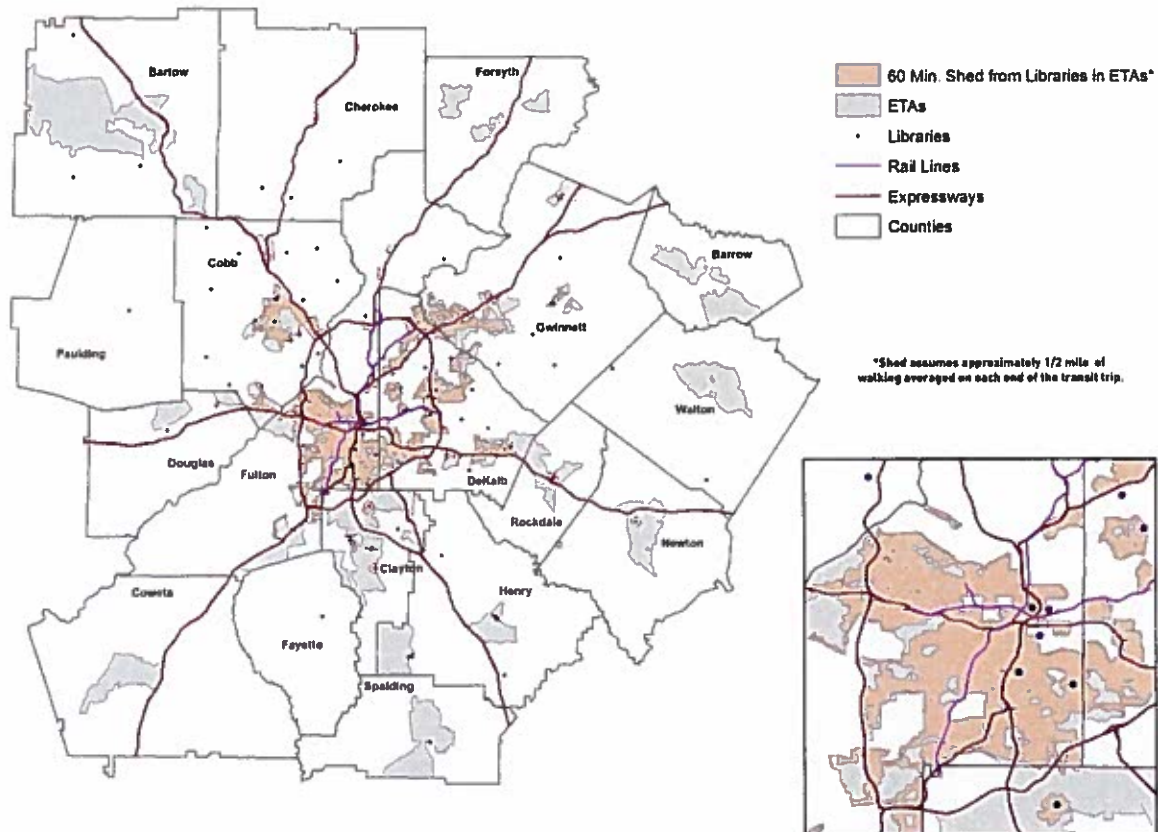
Hospital Transit Travel Sheds



Transit and Walking Travelsheds to Libraries

Libraries are a crucial resource for many households in poverty that may not have access to a computer or internet in their homes. The proliferation of online education and job applications make access to free internet an important way to connect people to opportunity. Libraries and ETAs tend to be centrally located in dense areas, therefore many people within the suburban ETAs shown in grey on this map might be able to walk or bike to the library within an hour provided the infrastructure is in place. There does not appear to be a serious disconnect between the proximity of libraries to ETAs versus non-ETAs, but the bicycle and pedestrian infrastructure in these areas should be analyzed for any gaps in connectivity.

Library Transit Travel Sheds



II. A metropolitan transportation planning process that identifies the needs of low-income and minority populations. An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.

ARC has a well-established planning process as espoused in its The Atlanta Region's Plan (see <http://www.atlantaregionsplan.com>). ARC specifically identifies the needs of low-income and minority populations within its planning process through the following actions:

- Establishing partnerships with federal, state and local governmental planning partners, such as the U.S. Department of Transportation, U.S. Environmental Protection Agency, Georgia Department of Transportation, Georgia Regional Transportation Authority, MARTA, Cobb County Transit;
- Utilizing ARC's existing committee structure, including the Poverty, Equity and Opportunity Committee, Community Engagement Network, and Bicycle and Pedestrian Task Force;
- Collaborating with ethnically/racially-focused community partners to obtain critical feedback on needs of low-income and minority populations, and to facilitate greater access to the targeted populations;
- Working across ARC agency lines to identify issues impacting low-income and minority populations, as well as the disabled and elderly; and,
- Identifying and conducting interviews with political, business, educational, environmental leaders representing low-income and minority persons regarding their views on the impact of ARC's transportation plans on their constituencies.

III. An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.

Title VI Plan For the Atlanta Regional Commission



A copy of ARC’s ETA Technical Analysis Methodology is provided in Attachment 1.5.

Through its ETA Technical Analysis Methodology, ARC analyses the impact of metropolitan transportation system investments. Below is a summary of ARC’s proposed investments for different ARC service offerings and their anticipated impact on ETA communities:

Proposed Investments	Anticipated Impact on ETA Communities
Investing in Transportation Access and Mobility	
<ul style="list-style-type: none"> • \$85.1 billion for The Atlanta Region’s Plan transportation investments through the year 2040 <ul style="list-style-type: none"> ○ \$16.3 billion for roadway maintenance, operations and safety – reflects a complete streets approach to ensure that the needs of pedestrians, bicyclists and transit riders are considered in project design and engineering ○ \$5.1 billion for transit operations and capital maintenance – people without the financial and/or physical capabilities of driving an auto are dependent on transit services to access medical facilities, government facilities, job training facilities, employment opportunities, shopping centers and other destinations ○ \$8.9 billion for interchanges and highway capacity – increased awareness of the access barriers created by such projects has led to the integration of walking and bicycling facilities into the design of major projects ○ \$7.0 billion for managed lanes – this network of facilities allows express buses to provide reliable long distance commute trips between affordable suburbs to major job centers ○ \$11.9 billion for transit expansion – 	<ul style="list-style-type: none"> • These projects potentially improve connectivity to employment centers, housing options, human services and health facilities, parks, recreational facilities and other services. • These projects improve the quality of life for all users of transportation facilities, including drivers, transit riders, bicyclists and pedestrians, as travel times are improved and congestion is reduced. • These projects may have positive health and environmental benefits on people living adjacent to the projects as emissions are reduced– improving air quality and safety improvements are made. • Approximately 48 percent of constrained projects in the regional transportation plan are located within or intersect ETA communities. • In total, for both constrained and aspirational elements of the regional transportation plan, \$10.7 billion is invested within or intersecting ETA communities, while \$5.19 billion is invested outside of ETA communities. • Of the projects that are within or intersect ETAs, 19% are bike/ped, 2% are planning studies, 52% are roadway, 23% are maintenance and safety, and 4% are transit. • 42 percent of express bus stops, 54 percent of local services transit stops, and 53 percent of heavy rail stations are in ETA’s. 38 percent of paratransit services cover ETA’s. • The Atlanta Regional Transit Vision will further integrate HST populations into the transit



<p>will open new opportunities to connect people with jobs and lifeline services</p> <ul style="list-style-type: none"> ○ \$1.0 billion for bicycling and walking facilities – provides affordable mobility and accessibility options ○ \$0.5 billion for planning, TDM and project scoping – supports ARC’s efforts at identifying equity target areas and appropriate solutions for those communities ○ Restoration of transit service in Clayton County ○ \$3.8 million for regional bus stop signage, shelters, benches and sidewalk upgrades ○ MARTA referenda to raise additional funds for transit in City of Atlanta (on ballot in November 2016) ○ Update underway for the Atlanta Regional Transit Vision plan 	<p>planning process. It will also include a strong emphasis on advanced technological improvements to support transit access and operations.</p>
<p>Investing in Communities</p>	
<ul style="list-style-type: none"> ● \$450,000 Simply Get There travel tool ● \$2.7 million in FTA Section 5310 and \$500,000 in FTA Section 5307 program funding for years 2015-2017 ● \$500 million for Livable Communities Initiatives Transportation Projects. Total cost of LCI projects in constrained plan is \$52.4 million. ● \$316,500 for Regional Alliances 	<ul style="list-style-type: none"> ● Simply Get There is a responsive website backed up by phone services that provides information on all transportation options in the region, including human services transportation for older adults and people with disabilities. ● ARC adopted a Coordinated Human Services Plan in 2010 and will complete an update in 2016. While there are many transportation funding sources to assist with HST improvements across multiple transportation modes, Section 5310 and Section 5307 are two key funding types that help to address the transportation needs of people with disabilities, seniors and individuals with low-income. ● Approximately 65 percent of LCI projects include ETA communities. ● ARC has created several projects which support regional alliances. These include the following: ● Transformation Alliance, funded through a Ford Foundation grant, is a coalition of agencies, staffed by ARC that invest in Non-profit organizations that advocate for community needs specific to equitable transit oriented development.



	<ul style="list-style-type: none"> • Atlanta Regional Housing Forum is a quarterly gathering of nonprofit, business, governmental, educational and grassroots organizations to discuss matters related to affordable housing and related topics, such as transportation and land use; and, • Neighborhood Nexus is a collaborative formed to offer universal access to data for community building.
<p>Investing in Technology and Innovation</p>	
<ul style="list-style-type: none"> • \$4.6 billion in System Optimization Investments • \$300,000 Strategic Highway Research grant to investigate the potential impacts of advanced technology on regional communities 	<ul style="list-style-type: none"> • These programs are targeted to optimize the performance of the existing transportation infrastructure. • ARC is investigating the impacts of disruptive technologies on the transportation system and land use through a scenario planning process, including impacts on disadvantaged communities.
<p>Environmental Stewardship</p>	
<ul style="list-style-type: none"> • AREES Tool • Clean Air Act requirements 	<ul style="list-style-type: none"> • The AREES tool makes it possible for ARC to look at near-road emissions on a neighborhood level scale. ARC can use this tool to evaluate different transportation scenarios for their impact on community air quality. The tool is also useful for the siting of sensitive land uses that may be impacted by roadway emissions in EJ communities; facilities like schools, playgrounds, parks and trails can all be sited with more knowledge of local air quality impacts. • ARC convenes an interagency committee with state, local and federal partners to ensure transportation compliance with federal Clean Air Act requirements. This committee ensures the transportation planning process complies with all federal requirements to ensure emissions are limited to protect public health.

ARC will continue to work to identify the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups and identifying imbalances. ARC has established a framework in which to conduct this analysis in The Atlanta Region’s Plan Policy Framework. To meet its vision of developing a world class infrastructure, ARC has developed a goal of “ensuring a comprehensive transportation network, incorporation regional transit and 21st Century technology.” In meeting this goal, ARC has further established an objective

of promoting an accessible and equitable transportation system through the following means:

1. Maintain and expand transportation options that serve the region's most vulnerable populations;
2. Improve connectivity around transit stations and bus stops for all users;
3. Increase funding for Human Services Transportation (HST) and Medicaid transportation services; and,
4. Increase access to areas with essential services, including healthcare, education, recreation, entertainment and commercial retail.

Attachments

Attachment 1.1: Title VI Complaints for the Period 2012-2015, with Disposition

Title VI Complaints Last Three Years

Complaint Date: January 18, 2013 - date of incident July 27, 2012
Name of Complainant: Willie Simpson d/b/a Crossroads Comprehensive Youth Development Center
Reason for Complaint: Discrimination based on race and religion - proposal was not fully funded
Disposition of Complaint: Insufficient evidence of discrimination
Date Resolved: March 31, 2014

Complaint Date: February 21, 2013 – (Dates September 2011 to February 2012)
Name of Complainant: Lazanius Johnson
Reason for Complaint: Discrimination based on disability
Disposition of Complaint: Insufficient evidence of discrimination
Date Resolved: March 28, 2014

Complaint Date: September 30, 2013
Name of Complainant: Phyllis Andrade
Reason for Complaint: Discrimination based on national origin when denied enrollment into paralegal program
Disposition of Complaint: Before settlement ARWDB paid for paralegal training at Kennesaw State
Awarded \$500 for transportation to school

Civil Rights Settlement required corrective actions in three areas:
Data Information Collection and Maintenance - resolved
Record Retention and Maintenance- resolved
Medical and Disability-Related Information – this issue remains unresolved. Civil Rights requires separate paper files, and the state of Georgia uses an electronic filing system approved by USDOL
Employment and Training Administration, where all data is maintained in the single file, password protected.

Anna Thompson
July 11, 2016

**Title VI Plan
For the Atlanta Regional Commission**



Attachment 1.2: ARC Limited English Proficiency Plan

The Limited English Proficiency Plan, <http://atlantaregional.com/about-us/title-vi-compliance/limited-english-proficiency-plan>

Title VI Plan For the Atlanta Regional Commission



Attachment 1.3: ARC Regional Community Engagement Plan

The Regional Community Engagement Report, current Regional Transportation Participation Plan, <http://www.atlantaregional.com/transportation/community-engagement>

The Atlanta Region's Plan Stakeholder Engagement Plan
<http://atlantaregionsplan.com/community-engagement/>



Attachment 1.4: Summary of ARC 5303 Reports

ARC 5303 Summary Report for Transportation Equity and Public Involvement

<p>1st Qtr. 2012</p>	<p><u>Transportation Equity</u> (ARC Cost Center 206FTP)</p> <ul style="list-style-type: none"> • Convened quarterly meeting of the Social Equity Advisory Committee with an update on the Transportation Referendum, input on the proposed Regional Community Engagement Plan and jobs and a briefing on a new report by the Partnership for Southern Equity addressing jobs and the Transportation Investment Act. • Outreach to Latino business leaders on the Transportation Referendum was initiated with a speaking engagement at the Latin American Chamber of Georgia, interviews with <i>Telemundo</i> and <i>Mundo Hispanico</i> and a subsequent discussion with representatives of Univision. Efforts also continuing to connect minority stakeholders with MAVEN and other appropriate groups. • Implemented an expansive external outreach for the Limited English Proficiency Plan update among organizations impacted by the primary languages addressed in the plan and completed an internal survey of languages other than English spoken by ARC staff. • Provided assistance to and attended the Partnership for Southern Equity (PSE) for the “Moving to Opportunity” community forum in Gwinnett County and continuing participation with the PSE Just Transportation Circle core group. • Attended the Southeast Regional Summit White House Initiative on Asian Americans and Pacific Islanders and the Georgia Hispanic Chamber Legislative Breakfast. • Produced 2 editions of the <i>Global Atlanta Works</i> newsletter and continued work on a framework outreach plan. • Participated in discussions on a new ARC community engagement framework • Continued to attend meetings of the MARTA Board and the MARTA Planning & Development Committee, when feasible. • Continued work to enhance opportunities for engagement in the ARC regional planning processes with ethnic chambers, The Atlanta Business League, Georgia Association of Black Elected Officials, Georgia Association of Latino Elected Officials, the Gwinnett Unity Coalition, the Atlanta Urban League and local NAACP branches. <p><u>Public Involvement</u> (ARC Cost Center 206FPT)</p> <ul style="list-style-type: none"> • Participated in planning of future applications for the Transportation Division website, particularly the public participation pages. • Completed the PLAN 2040 public outreach evaluation.
---------------------------------	--



	<ul style="list-style-type: none"> • Initiated the update to the Public Participation Plan. • Initiated discussions regarding the future of PIAG. • Participated in update of the LEP report. • Provided public outreach instruction for the LCI Kickoff • Worked with internal and external partners on TIA information development and distribution. • Worked with MMPT public outreach development and Beltline environmental justice outreach development. • Continued to support initiatives by national and local organizations on transportation public outreach. Continued to work with national public participation groups to advance the state of the practice. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update civic association and homeowner association mailing lists and continued interface with their representatives.
2 nd Qtr. 2012	<p><u>Transportation Equity</u> (ARC Cost Center 206FTP)</p> <ul style="list-style-type: none"> • Convened quarterly meeting of the Social Equity Advisory Committee of June 6th with the primary focus on the implementation plan for the Limited English Proficiency Plan. Outreach also continued with presentations to the Human Services Transportation Advisory Committee and the Transportation Coordination Committee. • Distributed TIA information to a broad range of African American, Latino and Asian American organizations and groups and assisted in identifying opportunities for their involvement. Activities also included sending notifications of the availability of Spanish presentations of the TIA and related translated information to over 50 Latino organizations and individuals. • Organized outreach meetings with the leadership of the Lation American Association and the Latin American Chamber of Georgia to address opportunities to enhance future engagement. • Partnered with Clark Atlanta University for the eleventh year on the CAU Transportation Institute, a program for high school minority students. • Provided information and data to consultant working on new ARC Title VI Plan. • Continuing to serve on the Partnership for Southern Equity (PSE) Equity Atlanta Committee as well as the Asian American Resource Center, Women’s Advisory Leadership Council and the International Women’s Think Tank. • Continued to serve on the Human Services Transportation Committee and to also attend meetings of the PSE Transportation Circle, MARTA Board and the MARTA Planning & Development Committee.



	<ul style="list-style-type: none"> Continued to maintain ongoing contact and provide information to groups such as the region’s ethnic chambers, The Atlanta Business League, Georgia Association of Black Elected Officials, Georgia Association of Latino Elected Officials, the Gwinnett Unity Coalition, the Atlanta Urban League and local NAACP branches. Continued to maintain ongoing contact and provide information to groups such as the region’s ethnic chambers, The Atlanta Business League, Georgia Association of Black Elected Officials, Georgia Association of Latino Elected Officials, the Gwinnett Unity Coalition, the Atlanta Urban League and local NAACP branches. <p>Public Involvement (ARC Cost Center 206FPT)</p> <ul style="list-style-type: none"> Completed the update to the public participation plan entitled the Community Engagement Plan. This included documentation of outreach, outreach meetings, surveying, writing the plan, starting public review and comment period, and incorporation of the Limited English Proficiency plan (LEP). [11] Participated in update of the LEP report. Continued discussions regarding the future of PIAG. Participated in the MMPT and TDM project planning. Worked with internal and external partners on TIA information development and distribution: reporting, Wireside Chats, answering questions, FAQ development, communications, and an internship on TIA. [12] Continued to support initiatives by national and local organizations on transportation public outreach. Continued to work with national public participation groups to advance the state of the practice. [13] Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. [14] Continued to update civic association and homeowner association mailing lists and continued interface with their representatives. [15]
3 rd Qtr. 2012	<p>Transportation Equity (ARC Cost Center 206FTP)</p> <ul style="list-style-type: none"> Provided oversight of the transmittal process for the Limited English Proficiency Plan, adopted by the ARC Board in August, [16] and the posting of the updated plan on the ARC website. Efforts are ongoing to communicate plan content to collaborative [17] community partners and local governments. [18] Continuing to represent ARC on the Partnership for Southern Equity’s Metro Atlanta Equity Atlas (MAEA) subcommittee, a [19] group of partner organizations who convene monthly to oversee its implementation. Began working with the community [20] engagement work group to create awareness of the MAEA throughout the region. [21] Initiated planning to develop recommendations on refocusing the Social Equity Advisory Committee with assistance from a [22] small group consisting of



	<p>representatives of the current committee, the ARC Board and key community leaders. The first meeting of this ad hoc group will be held on October. The next meeting of the Social Equity Advisory Committee will be in December. [51]</p> <ul style="list-style-type: none"> • Working on ad hoc committee charged by the Cobb United Way to assess and discuss the performance of community investments, particularly in minority communities. [14] • Serving on the local planning committee for the 70th Annual NAACP and Civil Rights Conference to be held in October. [5] • Working on the planning committee for the 2013 International Women’s Day, where a major component will focus on [2]nvironmental justice. [4] • Continued to serve on the Human Services Transportation Committee. [11] • Continued to maintain ongoing contact and provide information to groups such as the region’s ethnic chambers, The Atlanta Business League, Georgia Association of Black Elected Officials, Georgia Association of Latino Elected Officials, the Latin American Chamber of Commerce, the Atlanta Urban League, the Asian American Resource Center Women’s Advisory Leadership Council, the Organization of Chinese Americans and local NAACP branches. <p>Public Involvement (ARC Cost Center 206FPT)</p> <ul style="list-style-type: none"> • Regional Community Engagement Plan and the Limited English Proficiency Plan were adopted by ARC in August 2012. [2]istribution of new plans began in September 2012 [14] • Reformatted the Community Engagement Network newsletter and expanded the distribution list to include more county and [15]ther nonprofit participation. Redesigned the ARC website to include a Community Engagement Network page and an [15]accompanying Resource page with archived newsletters as well. [13] • Initiated a comprehensive internal and external discussion on how to structure future community engagement activities [16]ased on the policy directed by the Community Engagement Plan. [11] • Participated in the MMPT and TDM project planning. [11] • Continued work on TIA information distribution and after the vote, on a detailed discussion of the process over the last two [17]years. [11] • Continued to support initiatives by national and local organizations on transportation public outreach such as the Regional [18]eighborhood Summit and Neighborhood Nexus and review of national public outreach/environmental justice paper submissions to TRB for annual meeting in 2013. Continued to work with national public participation groups to advance the state of the practice. [11] • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. [14]
--	---



	<ul style="list-style-type: none"> Continued to update civic association and homeowner association mailing lists and continued interface with their representatives. [14] Worked on AMPO and TRB submissions for public outreach work over the last year.
4 th Qtr. 2012	<p><u>Transportation Equity</u> (ARC Cost Center 206FTP)</p> <ul style="list-style-type: none"> Continued ongoing efforts to communicate Limited English Proficiency plan to collaborative community partners and local [15] governments. [15] Continuing to represent ARC on the Partnership for Southern Equity's Metro Atlanta Equity Atlas (MAEA) subcommittee, a [16] group of partner organizations who convene monthly to oversee its implementation. Work is ongoing to create awareness of [17] the MAEA to stakeholders throughout the region. [17] The ad hoc group charged with developing recommendations on refocusing the Equity Advisory Committee met in October [18] and finished work in October during a 1 day retreat. Initial recommendations will be implemented in 2013. [18] Continued bi-weekly meetings of the planning committee for the March 2013 International Women's Day with a significant [19] emphasis on sustainability and environmental justice. [19] Continued to serve on the Human Services Transportation Committee. [20] Continued to maintain ongoing contact and provide information to groups such as the region's ethnic chambers, The Atlanta [21] Business League, Georgia Association of Black Elected Officials, Georgia Association of Latino Elected Officials, the Latin American Chamber of Commerce, the Atlanta Urban League, the Asian American Resource Center Women's Advisory Leadership Council, the Organization of Chinese Americans and local NAACP branches. [21] <p><u>Public Involvement</u> (ARC Cost Center 206FPT)</p> <ul style="list-style-type: none"> Initiated and completed a public outreach period on Amendment #1 to the PLAN 2040 RTP/TIP. [22] Distributed the Community Engagement Network and continued discussions on the redesign of the community engagement [23] portion of the ARC website. Continued an internal and external discussion on how to structure future community engagement activities based on the [24] public directed by the Community Engagement Plan. [24] Participated in the MMPT and TDM project planning. [25] Continued work on a retrospective TIA process paper. [26] Continued to support initiatives by national and local organizations on transportation public outreach and work with national [27] public participation groups to advance the state of the practice. [27]

**Title VI Plan
For the Atlanta Regional Commission**



	<ul style="list-style-type: none"> • Participated in discussions on how to restructure the Social Equity Advisory Committee. [13] • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. [13] • Continued to update civic association and homeowner association mailing lists and continued interface with their [13] representatives. [13] • Initiated discussion on the public outreach process for the first update to PLAN 2040. [13]
1 st Qtr. 2013	<p>Public Involvement (ARC Cost Center 306FPT)</p> <ul style="list-style-type: none"> • Consulted with stakeholders for the public involvement element of the PLAN 2040 RTP update. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Participated in the MMPT and TDM project planning. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update civic association and homeowner association mailing lists and continued interface with their representatives.
2 nd Qtr. 2013	<p>Public Involvement (ARC Cost Center 306FPT)</p> <ul style="list-style-type: none"> • Consulted with stakeholders for the public involvement element of the PLAN 2040 RTP update. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Participated in the RTP and TIP project planning. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update community group and local government mailing lists and continued interface with their representatives.



<p>3rd Qtr. 2013</p>	<p><u>Public Involvement</u> (ARC Cost Center 306FPT)</p> <ul style="list-style-type: none"> • Continued consultation with stakeholders for the public involvement element of the PLAN 2040 RTP update. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Participated in the RTP and TIP project planning. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update community group and local government mailing lists and continued interface with their representatives.
<p>4th Qtr. 2013</p>	<p><u>Public Involvement</u> (ARC Cost Center 306FPT)</p> <ul style="list-style-type: none"> • Continued consultation with stakeholders for the public involvement element of the PLAN 2040 RTP update. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Participated in the RTP and TIP project planning. • Developed and hosted Model Atlanta Regional Commission’s mobility and aging activity, promoting an intergenerational dialogue regarding transportation options and community planning with high school youth. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Assisted with development of a regional panel survey to be set up for ongoing use. • Responded to partner and public requests on PLAN 2040 and other planning activities.



<p>1st Qtr. 2014</p>	<p>Public Involvement (ARC Cost Center 406FPT)</p> <ul style="list-style-type: none"> • Held the PLAN 2040 Pop-Up Open House which drew a crowd of 130 people to learn about the Regional Transportation Plan and meet transportation planning staff. Information was presented in vibrant and informal displays. • Hosted online open house to provide detailed and visually engaging information on the Regional Transportation Plan projects and strategies. • Conducted a stakeholder open house and formal public hearing for the PLAN 2040 update. • Received, tracked, responded to and documented all public comments for the PLAN 2040 RTP. • Initiated update of Regional Community Engagement Plan. • Continued to facilitate discussions with key staff for crowdsourcing software platforms for community outreach and relationship building. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Assisted with development of a regional panel survey to be set up for ongoing use. • Responded to partner and public requests on PLAN 2040 and other planning activities.
---------------------------------	--



<p>2nd Qtr. 2014</p>	<p><u>Public Involvement</u> (ARC Cost Center 406FPT)</p> <ul style="list-style-type: none">• Prepared a technical update to the Regional Community Engagement Plan and promoted the document to stakeholders, planning partners and general public for official 45-day review period.• Facilitated discussions with key staff and prepared content for Phase 1 MetroQuest survey to use during the next major plan update. The survey will be open from June 20-September 26, 2014.• Began outreach using MetroQuest survey online and face-to-face.• Continued to develop and prepare for major outreach activities related to the 2016 PLAN 2040 Update.• Prepared content and messaging plan for webpages to support major plan update targeted for March 2016.• Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources.• Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan.• Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities.• Continued to update community group and local government mailing lists and continued interface with their representatives.• Responded to partner and public requests on PLAN 2040 and other planning activities.
---------------------------------	--



<p>3rd Qtr. 2014</p>	<p><u>Public Involvement</u> (ARC Cost Center 406FPT)</p> <ul style="list-style-type: none"> • Developed a limited update of the Regional Community Engagement Plan (CEP) which was adopted by ARC in July. A complete update is targeted by March 2016. • Launched, managed and conducted outreach for the Phase I MetroQuest survey in support of The Regional Plan update. The survey promotion relied heavily on online outreach as well as in person promotion. • Assisted with an updated Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities. Organized and hosted an ETA advisory committee workshop for local stakeholders and general public. • Continued to develop and prepare for major outreach activities related to the 2016 The Regional Plan Update. • Prepared content and messaging plan for webpages to support major plan update targeted for March 2016. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Responded to partner and public requests on PLAN 2040 and other planning activities.
---------------------------------	---



<p>4th Qtr. 2014</p>	<p><u>Public Involvement</u> (ARC Cost Center 406FPT)</p> <ul style="list-style-type: none"> • Continued to develop and prepare for major outreach activities related to the 2016 “The Regional Plan” Update, including the Stakeholder Engagement Plan. • Coordinated preparation of a survey results report for Phase I MetroQuest survey in support of The Regional Plan update. The survey promotion relied heavily on online outreach as well as in person promotion. • Coordinated development of content for Phase II outreach survey to support Regional Plan using MetroQuest tool, set to launch in early 2015. • Prepared content and messaging plan for webpages to support major plan update targeted for March 2016. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Developed and conducted community engagement training for key staff at ARC. • Developed and presented webinar about public involvement for the FHWA TMIP. • Coordinated outreach event for Model Atlanta Regional Commission to introduce high school students to transportation planning. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Participated in the Equitable Transit Oriented Development Community Engagement subcommittee. • Assisted with an updated Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities. Developed plans for a second quarterly ETA advisory committee workshop for local stakeholders and general public. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Distributed the Community Engagement Network e-newsletter, including weekly distributions and updated webpage with a CEN Resources. • Responded to partner and public requests on The Regional Plan and other planning activities.
---------------------------------	---



<p>1st Qtr. 2015</p>	<p><u>Public Involvement</u> (ARC Cost Center 506FPT)</p> <ul style="list-style-type: none"> • Continued to prepare and conduct outreach activities related to the 2016 “The Regions Plan” Update, included in the Stakeholder Engagement Plan. • Conducted a Phase II online outreach survey to support The Region’s Plan using MetroQuest tool. The survey promotion relied heavily on online outreach as well as in person promotion from January through March 2015. • Prepared content and messaging plan for webpages to support major plan update targeted for March 2016. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to support agency large outreach activities, including Millennials Advisory Panel group and Local Government Outreach Teams initiative. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Coordinated a community forum related to the Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities specific to transportation policy. Developed plans for a third quarterly ETA advisory committee workshop for local stakeholders and general public related to livability. • Attended and participated in Transportation Research Board conference, including Public Involvement Committee and Environmental Justice Committee meetings and workshops. • Completed National Transit Institute training on Environmental Justice. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Distributed the Community Engagement Network e-newsletter, including weekly distributions. • Responded to partner and public requests on The Regional Plan and other planning activities.
---------------------------------	---



<p>2nd Qtr. 2015</p>	<p><u>Public Involvement</u> (ARC Cost Center 506FPT)</p> <ul style="list-style-type: none"> • Continued to prepare and conduct outreach activities related to the 2016 “The Region’s Plan” Update, included in the Stakeholder Engagement Plan. • Conducted a series of community focus group discussions with key community stakeholders in support of The Region’s Plan Stakeholder Engagement Program. • Prepared an analysis report of Phase II online outreach survey results to support The Region’s Plan using the MetroQuest tool. The survey promotion relied heavily on online outreach as well as in person promotion from January through March 2015. • Prepared content and messaging plan for webpages to support major plan update targeted for February 2016. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to support agency large outreach activities, including Millennials Advisory Panel group and Local Government Outreach Teams initiative. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Coordinated a third community forum related to the Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities with a specific focus on livability and equity. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Distributed the Community Engagement Network e-newsletter, including weekly distributions. • Responded to partner and public requests on The Region’s Plan and other planning activities.
---------------------------------	---



<p>3rd Qtr. 2015</p>	<p><u>Public Involvement</u> (ARC Cost Center 506FPT)</p> <ul style="list-style-type: none"> • Continued to prepare and conduct outreach activities related to the 2016 “The Atlanta Region’s Plan” Update, included in the Stakeholder Engagement Plan. • Conducted a series of community focus group discussions with key community stakeholders in support of The Region’s Plan Stakeholder Engagement Program. • Assisted with the Clark-Atlanta University Summer Transportation Institute to engage high school youth in transportation activities. • Prepared content and messaging plan for webpages to support major plan update targeted for February 2016. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to support agency large outreach activities, including Millennials Advisory Panel group and Local Government Outreach Teams initiative. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Coordinated a fourth community forum related to the Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities with a specific focus on economic opportunity. • Assisted with task development for SHRP2 Implementation Assistance Program. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Distributed the Community Engagement Network e-newsletter, including weekly distributions. • Responded to partner and public requests on The Atlanta Region’s Plan and other planning activities.
---------------------------------	---



<p>4th Qtr. 2015</p>	<p>Public Involvement (ARC Cost Center 506FPT)</p> <ul style="list-style-type: none"> • Continued to prepare and conduct outreach activities related to the 2016 “The Atlanta Region’s Plan” Update, included in the Stakeholder Engagement Plan. • Conducted a series of community focus group discussions and other outreach activities with key community stakeholders in support of The Atlanta Region’s Plan Stakeholder Engagement Program. • Prepared content and messaging plan for webpages to support major plan update targeted for February 2016. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan. • Continued to support large agency outreach activities, including Millennials Advisory Panel group and Local Government Outreach Teams initiative. • Continued to work to reach environmental justice communities, ethnic communities and populations with disabilities. • Coordinated a fifth community forum related to the Equitable Target Area (ETA) evaluation process to address Environmental Justice in planning activities with a specific focus on economic opportunity. • Prepared and distributed a third online survey to solicit input on plan recommendations using the MetroQuest tool. • Assisted with task development for SHRP2 Implementation Assistance Program. • Continued to update community group and local government mailing lists and continued interface with their representatives. • Distributed the Community Engagement Network e-newsletter, including weekly distributions. • Responded to partner and public requests on The Atlanta Region’s Plan and other planning activities.
---------------------------------	---

Source: ARC, Hathor Strategic Consulting, Inc.

Attachment 1.5: ARC Title VI Technical Analysis Methodology

Equitable Target Area

The Equitable Target Area Index was created to identify environmental justice communities. The federal government defines environmental justice communities as minority and low income communities. Regulations such as Title VI of the Civil Rights Act of 1964 and Executive Order 12898 protect these communities and require planning organizations to identify and address any disproportionately high health or environmental effects on them. Our index is updated whenever new data is available and the methodologies are revised to more precisely identify environmental justice communities.

Index Methodology

The current version of the ETA Index was created using data from the 2012 5 year American Community Survey (ACS) and the 2010 Census. All of the data was aggregated at the census tract level. Since environmental justice communities are defined as low income and minority communities, our variables include:

- Percent of population in Census Tract considered to be in Poverty
- Percent of population in Census Tract that responded as African American
- Percent of population in Census Tract that responded as Asian
- Percent of population in Census Tract that responded as Hispanic
- Percent of population in Census Tract that responded as another race that is not White

The poverty data was obtained through the American Community Survey and all other variables were found using the 2010 Census, which is a more accurate representation of the population.

Categories were created for each variable based on the percentages of that population within each census tract. Standard deviations were then found, excluding outliers, using ArcGIS. A census tract was considered Category 1 if its percentage exceeded the highest standard deviation, Category 2 if it was between the second highest and highest standard deviation and Category 3 if it was below the second highest standard deviation. Figure 1 illustrates this process using a normal distribution below.

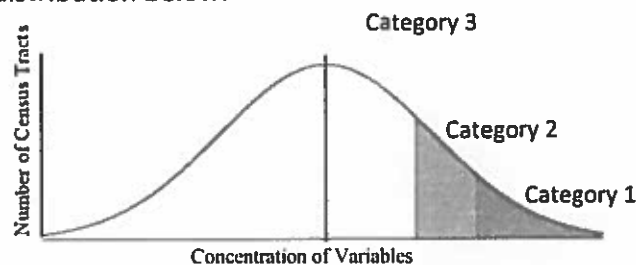


Figure 1: Example of standard deviation categories

In Figure 1, the darkest area would include census tracts with a Category 1 ranking for this variable and the lighter area would include census tracts with a Category 2 ranking for this

variable. While regional average had been used in the past, the number of tracts clustered near the average was found to dilute the areas in greatest need. This method solves that issue and switches the focus to the communities in greatest need. A comparison of these two options is shown in Figures 2 and 3.

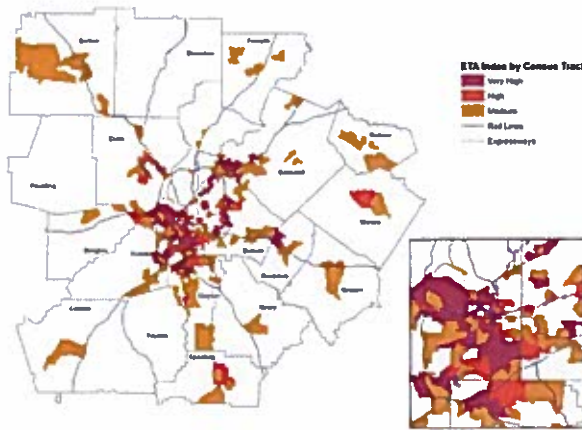


Figure 2: ETA Index Using Standard Deviation

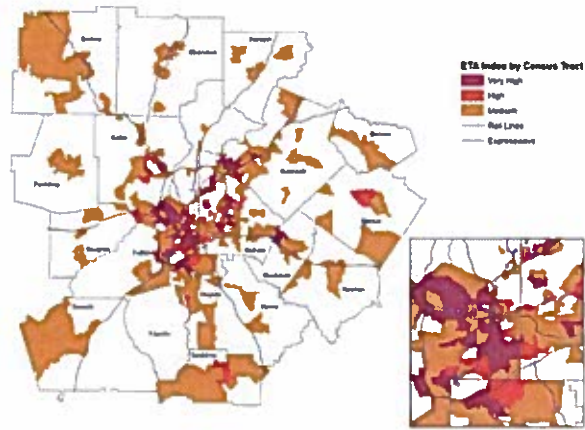


Figure 3: ETA Index Using Averages

After the categories were set, the race and ethnicity variables were consolidated across census tracts. This was done by using the highest ranked variables category. Therefore, if a census tract ranked 1 for Asian and 3 for all other race and ethnicity categories, the race ranking for the census tract is 1.

The poverty and race categories are then used to create a unified ETA Index. A chart of the index is shown below.

Table 1: ETA Index Categories

Poverty Category	Race Category	ETA Index
1	1	Very High
	2	High
	3	
2	1	Medium
	2	
	3	
3	1	Non-ETA
	2	
	3	

As Table 1 illustrates, concentration of poverty was used as a limiting factor for being considered an ETA and concentrations of minority populations affect whether an area is high or very high. This is meant to give a clearer image of the areas with the greatest need. A more specific breakdown of percentages is shown in Table 2 and Table 4 below.

Table 2: Category Percent Ranges by Variable

Variable	Category 1	Category 2	Category 3
Poverty	86% - 34%	33% - 22%	21% - 0
African American	98% - 80%	79% - 50%	50% - 0
Hispanic	92% - 40%	39% - 28%	28% - 0
Asian	46% - 13%	12% - 7%	7% - 0
Other Non-White Race	7% - 4%	3.9% - 3%	2.9% - 0

Table 3: Regional Averages by Variable

Variable	Regional Average
Poverty	14.3%
African American	34.5%
Hispanic	10.7%
Asian	5.7%
Other Non-White Race	5.4%

Table 4: Population Percentages by Final Category

Index	2010 Population	Percent of Population
Very High	233,273	4.7%
High	114,065	2.3%
Medium	752,792	15.1%
Total	1,100,130	22.1%

Spatial Analysis Methodologies

Once the ETAs were located, spatial analyses could be done. Most of the analysis focused on accessibility, due to the high transit dependent population within most ETAs. ARC also analyzed Ladders of Opportunity through accessibility to specific essential services based on the type and availability of data.

Further analysis was also done on other factors relating to ETAs such as zero car households and low wage jobs. There are many more factors that could be included as well, including highest obtained education level, high school dropout rates, and crime statistics. However, for the purpose of transportation related issues, they were left out of this study.

Buffering

The simplest way of determining accessibility is through proximity. For certain amenities, such as parks and transit stops, it can be assumed that they are most useful for those who can walk to them. Therefore, for these amenities a .5 mile buffer was used and overlaid onto the ETA map. While this method does not take into consideration actual travel distance or sidewalk conditions, it does serve to point out areas with little to no access anywhere near them.

Open Trip Planner Analyst

Open Trip Planner Analyst provides more in depth accessibility analysis by using transit schedule information and route finding algorithms to create transit travel sheds based on duration of trip. One way to utilize this tool would be to enter an address and see how far you could go, where you could go, and how long it would take you if you took transit. Open Trip Planner Analyst also allows a script to be used to find travel sheds using multiple locations. To analyze how accessible different places within the ETAs were to different services, the ARC found point locations for grade schools, grocery stores, higher education, hospitals, and libraries. Since the ETAs cover a wide area of the region, it made more sense to use the destinations as the starting place to see how much of the ETAs were covered by their transit sheds.

There are several caveats to these analyses, however. For example, because Open Trip Planner only has access to schedule data, choosing different time periods can affect the travel sheds. These maps were all created using a 9:00 am departure time, but that level of service may not be available for those using the system at 12:00 pm. Also, most of the commuter bus systems only run service in one direction during peak periods and only during weekdays. Another factor regarding schedule information is the lack of on-demand transit options. These services greatly increase accessibility for people with disabilities and aging populations.

Zero Car Households

15% of households in the region do not own a car. These households tend to have more burdens with mobility and less access to services. Zero car household data was found by census tract using 2012 ACS and are broken into categories using natural breaks starting from the regional mean.

Low Wage Jobs

For some, low wage jobs can provide the first step out of poverty. However, travel time to and from these jobs can often come a large costs for things such as day care or an inability to schedule time for a second job. Therefore, availability and accessibility to low wage jobs from ETAs are crucial. Total low wage jobs were found by census tract using 2012 ACS and are broken into categories using natural breaks starting from the regional mean.