

Title VI Plan

Atlanta Regional Commission

Effective December 1, 2019



As a recipient of federal funds from the U.S. Department of Transportation and other federal agencies 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. This program is applicable to all federal funds received by ARC. This document references USDOT, FTA, and FHWA as the required approvers of this program, but is not exclusive of all federal funding sources for ARC.

DRAFT

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 23CFR. 200 and 49 CFR 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 2019 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 Title VI Coordinator to have direct access to the Executive Director:

Ms. Brittany Zwald
<i>Title VI Coordinator</i>
Staff Legal Counsel
Atlanta Regional Commission
229 Peachtree Street, NE, Suite 100
Atlanta, GA 30303
Phone: 470.378.1494
bzwald@atlantaregional.org

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;
- 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 and providing training as necessary.

Groups or Centers may appoint a point of contact to coordinate with the Title VI Coordinator. Current designated points of contacts are:

- Center for Livable Communities: Melissa Roberts, Community Engagement and Equity Manager
- Workforce Solutions Group: Suzette Tuitt, WIOA Equal Opportunity Officer
- Aging and Independence Services: Shelly Wender, M.Ed, CRS-A/D, CRS-DC, Language Access Coordinator

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 agency 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.

Benefit: Federal benefits, also known as federal aid, federal assistance, or federal funds, is defined as any federal program, project, service, or activity provided by the federal government that directly assists domestic governments, organizations, or individuals in the areas of education, health, public safety, public welfare, and public works, among others.

Federal financial assistance includes:

- (1) Grants and loans of Federal funds;
- (2) The grant or donation of Federal property and interests in property;
- (3) The detail of Federal personnel;
- (4) The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and

(5) Any Federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

III. Responsibility

The Executive Director of the Atlanta Regional Commission is responsible for Title VI and has designated Brittany Zwald, Staff Legal Counsel 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;
- The Regional Community Engagement Plan, an updated transportation public participation plan, adopted by the ARC in 2019;
- The Limited English Proficiency Plan;
- 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 established public comment periods;
 - Comment documentation and distribution to policy makers and the general public;
 - Opportunities for citizens to participate through focus groups, listening sessions, task forces and advisory groups;
 - 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.

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 Coordinator. 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 Coordinator 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 Coordinator, in consultation with the impacted Group or Center, 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.
- 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.: _____

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 Coordinator
Office of the Director
Atlanta Regional Commission
229 Peachtree Street, NE, Suite 100. Atlanta, Georgia 30303

D. Record Title VI Investigations, Complaints or Lawsuits

During the current period of 2016 to date, ARC received 0 complaints or lawsuits brought against ARC or its sub-recipients by entities that alleged discrimination on the basis of race, color, or national origin.

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 housed in a separate document available on the ARC website here: <https://atlantaregional.org/plans-reports/limited-english-proficiency-lep-plan/>.

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 <https://atlantaregional.org/leadership-and-engagement/guidelines-compliance/title-vi-plan-and-program/>.

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 Transportation 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:

Committee/Board	Total	Minority		Female	
		Count	Percentage	Count	Percentage
TAQC	34	10	29%	10	29%
ARC	39	12	31%	11	28%

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 an Environmental Justice Analysis 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 utilizes 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 Mundo Hispanico;
- Form special committees and partnerships to assist ARC to outreach to the targeted communities, such as, ARC's Transportation Equity Advisory Group, Partnership for Southern Equity, Human Services Transportation steering committee, Cobb and MARTA Transit Advisory Boards (and Accessibility boards), Aging Services Advisory Committee, Coalition for the People's Agenda, NAACP, 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.
- Participate in speaking engagements on transportation issues targeted to diverse groups throughout the region.
- Attend community events to share information on regional planning, 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, ARC's website, and ARC's social media 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 2016 to date 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 Environmental Justice maps and input from ARC's community partners, ARC attempts to identify locations within diverse communities that are accessible to all groups. Particular focus is 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".

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: Arabic, Chinese, French, German, Haitian Creole, Hindi, Ibo, Italian, Japanese, Kiswahili, Korean, Portuguese, Russian, Spanish, 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's 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 Regional Equity and Inclusion section, , the Equity Advisory Group page, the Public Plans and Guidelines page, as well as the Atlanta Region's Plan microsite.
- ARC also reports its activities as it relates to low-income, minority and LEP persons in quarterly and monthly 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 provides survey results of comments and concerns made by community members in a series of online surveys in support of The Atlanta Region's Plan, annual telephone public perception surveys, a series of focus groups and the Building Opportunity Workshops, particularly those representing low-income, minority and LEP persons. Results frequently identify the race, gender, age, and geographic location of the survey participants. Income levels are typically not requested; however, some survey questions allow ARC to determine whether the respondent lives in an area identified by ARC's Environmental Justice Analysis.

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 2022.

DRAFT

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 latest plan, Managing Mobility in the Atlanta Region, was adopted in March 2017. It is available online at: <https://atlantaregional.org/transportation-mobility/transit/human-services-transportation/>

Past HST 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. ARC's current Human Services Transportation Plan focuses on a strategic, integrated approach to HST, as opposed to a purely tactical approach.

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, 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 % of program funds must be used on capital or “traditional” (non NF) 5310 projects...The remaining 45 % 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.

ARC staff primarily relies on the following sources for HST coordination plan development guidance:

- Circular FTA C 9070.1F (05/01/2007) - <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/C9070.1F.pdf>;

- Circular FTA C 9030.1E (01/16/2014) - https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FINAL_FTA_circular9030.1E.pdf; and
- The Federal Register, Vol. 81, No. 30 (02/16/2016) - 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

Below are some of the noteworthy requirements and guidance from the aforementioned sources, that ARC staff relies on:

- All JARC funded services and projects must have been derived from a locally developed, coordinated public transit – human services transportation plan;
- FTA encourages public transit systems in all areas to continue to participate in the coordinated public transit–human service transportation planning process in order to identify and develop job access and reverse commute projects for funding under Section 5307;
- Public transit systems in UZAs in which a recipient is applying for funds under Section 5310 are required to continue to participate in the coordinated public transit–human service transportation planning process;
- FTA requires the following elements, at a minimum, be included in the coordination plans:
 - An assessment of available services that identifies current transportation providers (public, private, and nonprofit);
 - An assessment of transportation needs for individuals with disabilities and seniors;
 - 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,
 - Priorities for implementation based on resources (from multiple program sources), time, and feasibility for implementing specific strategies and/or activities identified
- Additionally, the [coordination] 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;
- Section 5307 (LARC/Low Income) 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.

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 has developed updated the Human Services Transportation Plan (2017), which takes a more strategic approach to ensuring the inclusion and full integration of HST issues. This action has been necessitated to ensure that federal funding sub-recipients are adequately considering and planning for the needs of underserved populations. ARC's strategic approach focuses on two components:

1. **Needs Assessment:** ARC 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.

Using this strategic approach overlaid with tactical operations, ARC is working toward results and outcomes for 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 and Section 5310 formula 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/Low Income-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 JARC/Low-Income set-aside amount are required to present their proposed program of projects 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, with concurrence from the Designated Recipient, to sub-allocate the set-aside amount to the eligible recipients. In addition to the set-aside funding, JARC/Low Income-related programs and projects can also be 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 5307 JARC Sub-recipients and 5310 Sub-recipients

Each sub-recipient is visited as least annually by an ARC Staff member 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.

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 on annual monitoring checklists.

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 Coordinator.

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 as part of the JARC and New Freedom grant contract.

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” of all sub-recipients. 5310 and JARC subgrantees are exempt from Drug and Alcohol testing programs.

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 an Environmental Justice analysis that examines racial minority, ethnic minority, and low-income populations. ARC previously analyzed these three inputs and referred to the results as Equitable Target Areas (ETA). The environmental justice model supplants the ETA index methodology and nomenclature. To learn more about the EJ Model Methodology, please visit [ARC's Racial Equity and Inclusion page, Equity Analyses section](#).

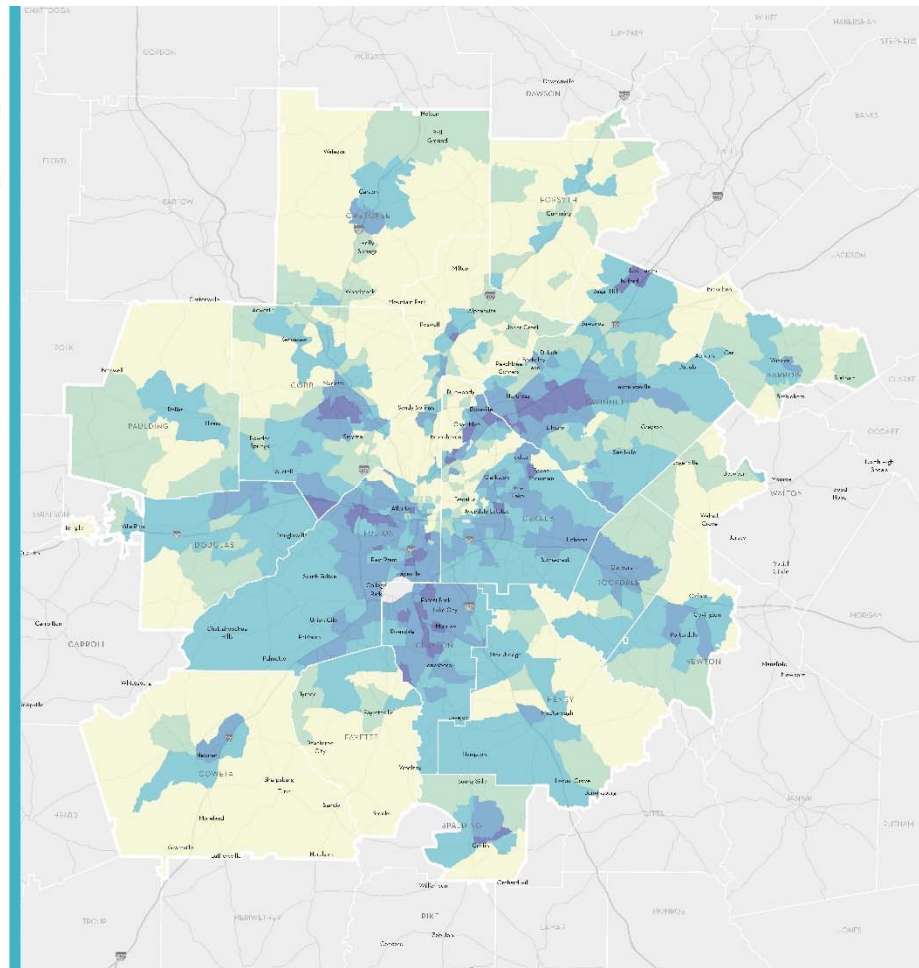
Based on the maps provided below , ARC makes the following observations:

- On average, 32.4% of the population lives below 200% of the poverty level. The highest concentration of poverty by census tract is in DeKalb County at 90.41% (population: 2324), followed by a census tract in Fulton County at 90.37% (population: 2180). The lowest concentration of poverty by census tract are in Cobb County at 1.7% (population: 3947) and in Fulton County at 2.8% (population: 5880).
- On average, 47.6% of the region's population is non-white. There are three census tracts that are 100% non-white in the region, all of which are in Fulton County (population total: 6763). The lowest concentration of non-white minorities is 0.7% in Forsyth County (population: 4185). On average, 10.7% of the population is of Hispanic or Latino origin. The highest concentration of ethnic minorities is 86.9% in DeKalb County (population: 3555). There are 13 census tracts across Gwinnett, DeKalb, and Fulton counties with no ethnic minorities.

Equity Analysis: Environmental Justice Model

The adjacent map reflects concentrations of racial minorities, ethnic minorities, and low-income populations at the census tract level across the region. The results guide regional transportation and land use planning investments. In particular, the ARC Transportation Improvement Program (TIP) Project Evaluation Framework utilizes the results of this analysis to score and rank proposed projects.

Concentration of Racial Minorities, Ethnic Minorities, and Low-Income Populations



ARC has developed a Protected Classes analysis that examines racial minority, ethnic minority, and low-income populations, as well as females, foreign born, limited English proficiency (LEP), older adults, people with disabilities, and youths. To learn more about the Protected Classes Model, please visit [ARC's Racial Equity and Inclusion page, Equity Analyses section](#).

Equity Analysis: Protected Classes Model

The protected classes model is an analysis that helps ARC more directly and clearly identify the nine populations protected under Title VI of the Civil Rights Act and considered within the Executive Order on Environmental Justice. Additional considerations were added based on FHWA's Environmental Justice recommendations (2017), FTA's Environmental Justice policy guidance (2012), and FTA's Title VI requirements and guidelines (2012).

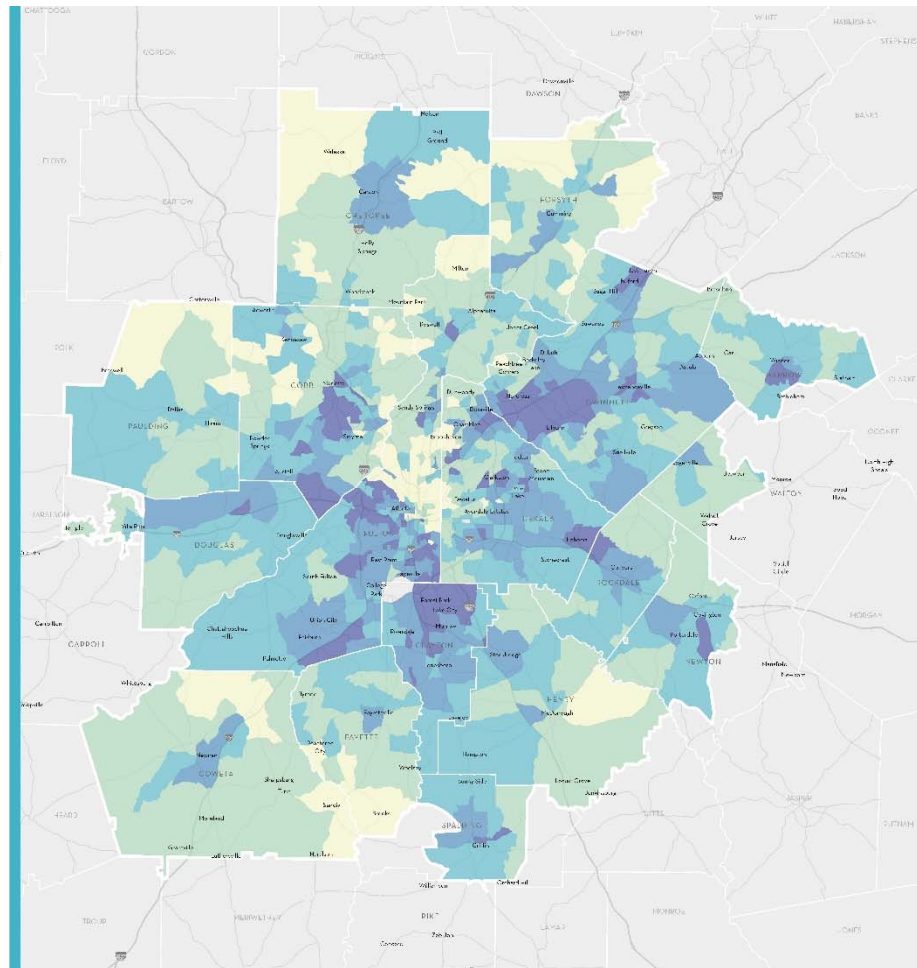
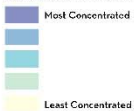
The results indicate population concentrations relative to the region. ARC uses the results of the analysis to demonstrate compliance with this guidance and demonstrate fair treatment of those population groups.

The protected populations are:

- Older Adults
- Youth
- Females
- Racial Minority
- Ethnic Minority
- National Origin
- Limited English Proficiency
- People with Disabilities
- Low-Income

Legend

Concentration of Protected Classes

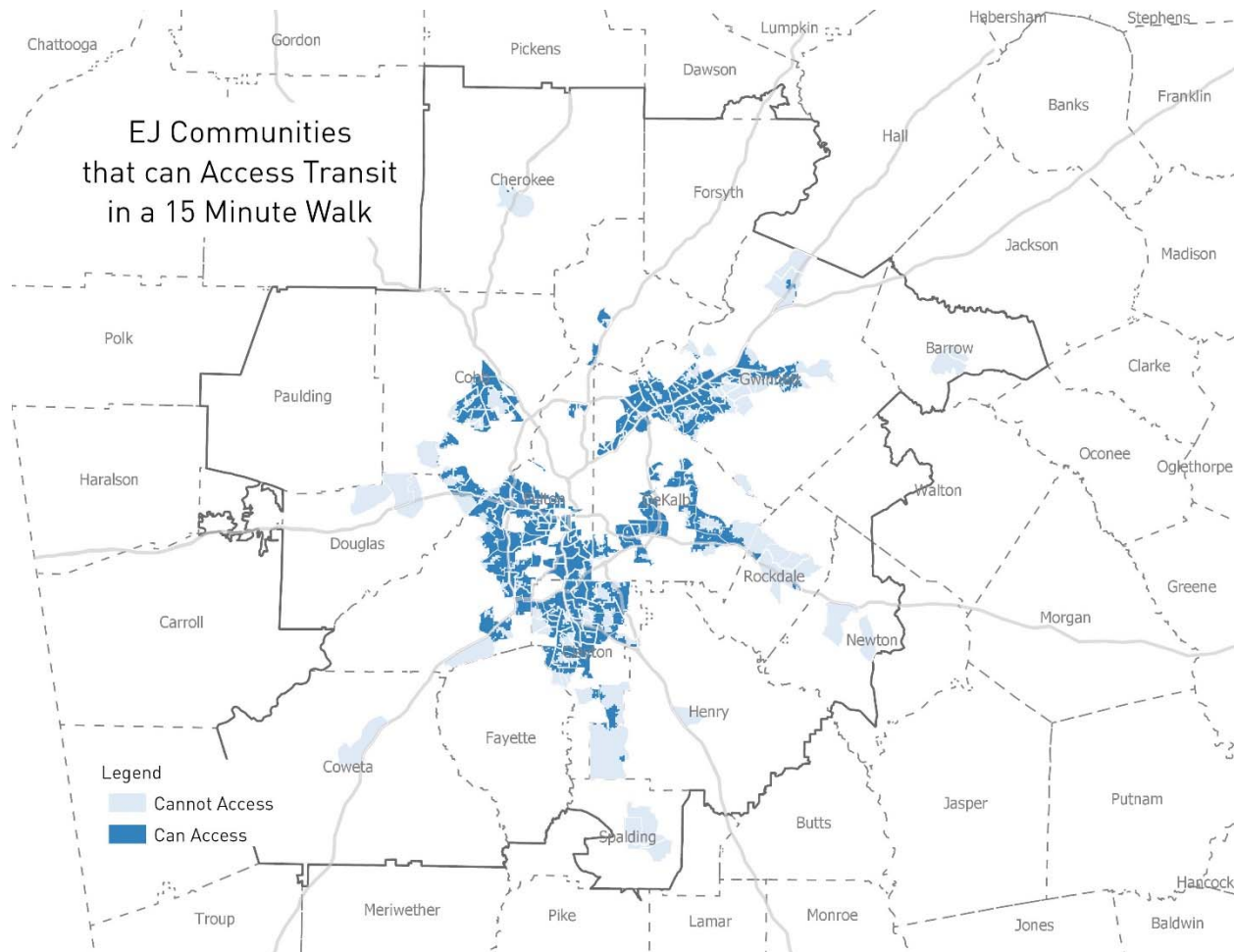


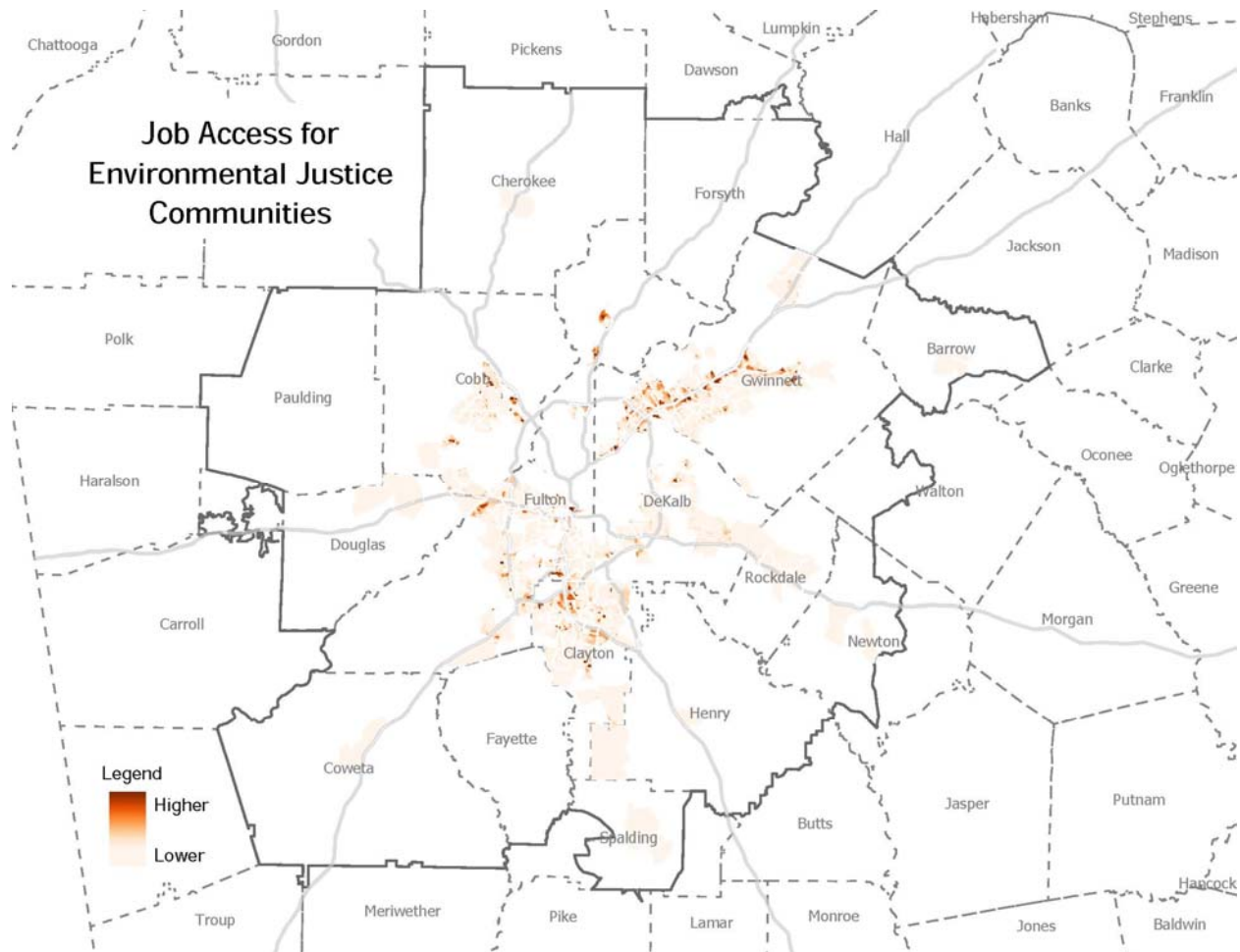
Transportation Equity Analysis

Access to transit is critical for getting to jobs and essential services. One way to analyze transit accessibility is by looking generally at the location on transit stops. Using the Environmental Justice Model, 50% of all transit stops intersect with environmental justice census tracts. Also, 91% of environmental justice census tracts are within a paratransit shed. Using the Protected Classes Model, 31% of all transit stops intersect with environmental justice census tracts and 92% of protected classes census tracts are within a paratransit shed.

Proximity to transit stops is not the only important factor to transportation equity. A deeper accessibility analysis requires looking at the networks around the stops. The following maps show how accessible transit stops are to people and jobs in the top 2 tiers of ARC's

Environmental Justice Model using Conveyal. The findings of this analysis were that 64% of people live within a 15-minute walk of transit stops and 78% of jobs are located within a 15-minute walk of transit stops in those top two tiers of the Environmental Justice Model.





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.org>). 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 ARC Transportation Equity Advisory Group, the 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.

A copy of ARC's Environmental Justice Analysis Methodology is provided in Attachment 1.5.

Through its Environmental Justice 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 Environmental Justice 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. • 136 of the 393 constrained projects in the draft regional transportation plan, approximately 35% intersect with a census tract with a high concentration of environmental justice communities. • 90 of the 393 constrained projects in the draft regional transportation plan, approximately 23%, intersect with a census tract with a high concentration of protected classes. • Of the 136 projects that intersect with environmental justice communities 21; 15% are bike/ped, 75; 55% are roadway, 21; 15% are operations, maintenance and safety, and 19; 14% are transit. • Using the Protected Classes Model, 31% of all transit stops intersect with environmental justice census tracts and 92% of protected classes census tracts are within a paratransit shed.

<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 	<ul style="list-style-type: none"> • Of the 90 projects that intersect with protected classes, 14; 16% are bike/ped, 75; 55% are roadway, 11; 12% are operations, maintenance, and safety, and 16, 18% are transit. • Using the Environmental Justice Model, 50% of all transit stops intersect with environmental justice census tracts and 91% of environmental justice census tracts are within a paratransit shed. • The Atlanta Regional Transit Vision will further integrate HST populations into the transit planning process. It will also include a strong emphasis on advanced technological improvements to support transit access and operations.
Investing in Communities	
<ul style="list-style-type: none"> • 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 that provides information on all transportation options in the region, including human services transportation for older adults and people with disabilities. \$168,750 was invested through an FTA Grant Mobility Services for All Americans between October 2015 and August 2017. • ARC adopted a Coordinated Human Services Plan in 2010 and completed an update in 2017. 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. • As of 2017, 76 of the 119 LCI projects approximately 64%, intersect census tracts with high concentration of Environmental Justice Communities, according to the Environmental Justice Model. • As of 2017, 65 of the 119 LCI projects, A approximately 55% intersect census tracts with high concentrations of protected classes According to the Protected Classes Model. • ARC has created several projects which support regional alliances. These include the

	<p>following:</p> <ul style="list-style-type: none"> • 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. • 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.
Investing in Technology and Innovation	
<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.
Environmental Stewardship	
<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.

5. Program-Specific Requirements and Guidelines for Local Workforce Development Areas

I. Funding

The Workforce Innovation and Opportunity Act (WIOA) is a United States public law that replaced the previous Workforce Investment Act of 1998 (WIA) as the primary federal workforce development legislation to bring about increased coordination among federal workforce development and related programs. WIOA is designed to strengthen and improve our nation's public workforce system and help get Americans, including youth and those with significant barriers to employment, into high-quality jobs and careers and help employers hire and retain skilled workers. ARC receives WIOA funding from the U.S. Department of Labor through the Technical College System of Georgia. The Atlanta Regional Commission's Workforce Solutions Group manages WorkSource Atlanta Regional, which is the program name for the advisory Workforce Development Board and Workforce Area. This program provides services to help meet the needs of today's employers and job seekers in Cherokee, Clayton, Douglas, Fayette, Gwinnett, Henry and Rockdale counties. WorkSource Atlanta Regional provides services at Career Resource Centers located throughout its seven-county service area. The Mobile Career Lab is also stationed weekly at convenient locations in the program area.

II. Monitoring

The Workforce Solutions Group has an inhouse monitoring team. The group has developed a specialized tool and policy to fit the programmatic requirements. In house monitoring services of WIOA subgrantees covers financial monitoring. The group utilizes a centralized complaint method for all participants where both programmatic and discriminatory complaints are brought directly to the ARC staff from all participants regardless of subgrantee responsibility or program.

III. Equal Opportunity Complaint Policy

WorkSource Atlanta Regional/ Atlanta Regional Workforce Development Board (ARWDB) adheres to the following United States law: "Equal Opportunity Is the Law". It is against the law

for this recipient of Federal financial assistance to discriminate on the following basis: race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA), on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas: (1) Deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity; (2) providing opportunities in, or treating any person with regard to, such a program or activity; or (3) making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

IV. Complaints

A complaint is an allegation of discrimination on the grounds a person, or any specific class of individuals, has been or is being discriminated against on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, citizenship status, or participation in any WIOA Title I-financially assisted program or activity as prohibited by WIOA or part 29 CFR 38.69. An allegation of retaliation, intimidation or reprisal for taking action or participating in any action to secure rights protected under WIOA will be processed as a complaint.

Persons who may file include any person requesting aid, benefits, services or training through the WorkSource Atlanta Regional workforce system; eligible applicants and/or registrants; participants; employees, applicants for employment; service providers, eligible training providers (as defined in the Workforce Innovation and Opportunity Act), and staff with the workforce system that believes he/she has been or is being subjected to discrimination prohibited under the Nondiscrimination and Equal Opportunity Provisions 29 CFR Part 38 and Section 188 of the Workforce Innovation and Opportunity Act (WIOA). Participants who feel they may have been discriminated against may file a complaint within 180 days from the date of the alleged violation with either:

- The Workforce Solutions Equal Opportunity Officer:
SUZETTE TUITT, EO OFFICER
WORKFORCE SOLUTIONS GROUP
229 PEACHTREE STREET N.E / SUITE 100
ATLANTA, GEORGIA 30303
(470) 378-1515
TDD: 711, voice: 1-800-255-0056,
stuitt@atlantaregional.org
- The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue NW., Room N-4123, Washington, DC 20210 or electronically as directed on the CRC Web site at www.dol.gov/crc.

If a participant files a complaint with ARC, they must wait either until ARC issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center. If ARC does not give the participant a written Notice of Final Action within 90 days of the day on which the complaint was filed, then they may file a complaint with CRC before receiving that Notice. If ARC does give a written Notice of Final Action on the complaint, but the participant is dissatisfied with the decision or resolution, the participant may file a

complaint with CRC. The complaint must be filed with CRC within 30 days of the date on which you received the Notice of Final Action.

Each complaint must be filed in writing, either electronically or in hard copy, and must contain the following information:

- The complainant's name, mailing address, and, if available, email address (or another means of contacting the complainant).
- The identification of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination).
- A clear description of the allegations in sufficient detail including the date(s) and timeline that the alleged violation occurred to allow the recipient, as applicable, to decide whether: (1) what agency has jurisdiction over the complaint; (2) the complaint was filed in time; and (3) the complaint has apparent merit; in other words, whether the complainant's allegations, if true, would indicate noncompliance with any of the nondiscrimination and equal opportunity provisions of WIOA or part 29 CFR Part 38.
- The written or electronic signature of the complainant or the written or electronic signature of the complainant's representative.

V. Complaint Processing Procedure

An initial written notice to the complainant will be provided within fifteen (15) days of receipt of the complaint. The notice will

include the following information pursuant to part 29 CFR 38.72:

- Acknowledgement of complaint received including date received; notice that the complainant has the right to be represented in the complaint process; notice of rights contained in §38.35; and notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in §§38.4(h) and (i), 38.34, and 38.36.

- A written statement of issue(s) which includes a list of the issues raised in the complaint; for each issue, a statement of whether or not the issue is accepted for investigation or rejected and the reasons for each rejection after performing a period of fact-finding.
- Notice that the complainant may resolve the issue Alternative Dispute Resolution (ADR) any time after the complaint has been filed, but before a Notice of Final Action has been issued.

If the complaint does not fall within the Workforce Innovation and Opportunity Act jurisdiction for processing complaints alleging discrimination under Section 188 or Equal Opportunity and Nondiscrimination provisions at 29 CFR Part 38.74, the complainant will be notified in writing within five (5) business days of making such determination. The notification shall include the basis of the determination as well as a statement of the complainant's right to file with the Civil Rights Center (CRC) within thirty (30) days of the determination.

VI. Complaint Processing Time Frame

A complaint will be processed, and Notice of Final Action issued within ninety (90) days of receipt of the complaint pursuant to 29 CFR 38.72. Complainant may elect to file his or her equal opportunity complaint with the Technical College System of Georgia (TCSG) Office of Workforce Development (OWD). TCSG OWD's address and information is as follows: Attention: Compliance & Legal Affairs Director, David Dietrichs, 1800 Century Place N.E., Suite 150, Atlanta, Georgia 30345-4304; (404) 679-1371; wioacompliance@tcsg.edu.

If WorkSource Atlanta Regional/ARWDB has not provided complainant with a written decision within ninety (90) days of the filing of the complaint, complainant need not wait for a decision to be issued. Complainant may file a complaint with TCSG or CRC within thirty (30) days of the expiration of the 90-day period. If complainant is dissatisfied with WorkSource Atlanta Regional/ARWDB's resolution of his or her equal opportunity complaint, complainant may file a complaint with TCSG. Such complaint must be filed within thirty (30) days of the date you received notice of WorkSource Atlanta Regional/ARWDB's proposed resolution.

OR

Complaints may be initially filed or appealed to the Director, Civil Rights Center (CRC) U.S. Department of Labor, 200 Constitution Avenue, N.W. Room N-4123, Washington, DC 20210 or electronically as directed on the CRC website at www.dol.gov/crc within thirty (30) days of complainant's receipt of either WorkSource Atlanta Regional/ARWDB Notice of Final Action or TCSG Notice of Final Action. In other words, within one hundred twenty (120) days Complainant may file his or her appeal.

Resolution Process

Alternative Dispute Resolution: Complainant must be given a choice as to the manner in which they have their complaint resolved. After an investigation is conducted by the Equal Opportunity Officer, ADR may be chosen by the complainant to resolve the issues, as long as a Notice of Final Action has not been issued. Mediation is recommended ADR and will be conducted by an impartial mediator. Complainant must notify the Equal Opportunity Officer within ten (10) days of receiving the Notice of Issue Statement letter of whether ADR is selected to resolve the dispute. WorkSource Atlanta Regional/ARWDB will provide an impartial mediator and will provide interested parties information regarding the arrangements (date, time, and location).

Time Frame: The period for attempting to resolve the complaint through mediation will be thirty (30) days from the date the complainant chooses mediation; but must be performed within ninety (90) days of the initial filing date.

Successful Mediation: Upon completion of successful mediation, the complainant and respondent will both sign a conciliation agreement attesting that the complaint has been resolved. A copy of the conciliation agreement will be provided to Technical College System of Georgia, Office of Workforce Development within ten (10) days of the date the conciliation agreement was signed.

Unsuccessful Mediation: In the event mediation was not successful, WorkSource Atlanta Regional/ARWDB shall proceed with issuing a Notice of Final Action within the ninety (90) day limit.

Complainant Responsibility: The complainant may amend the complaint at any point prior to the beginning of mediation or the issuance of the Notice of Final Action. The complainant may withdraw the complaint at any time by written notification.

Breach of Agreement: Any party to any agreement reached under ADR may file a complaint in the event the agreement is breached with David Dietrichs, Compliance & Legal Affairs Director, Technical College System of Georgia, Office of Workforce Development, 1800 Century Place N.E., Suite 150, Atlanta, Georgia 30345-4304; (404) 679-1371; wioacompliance@tcsg.edu; or Director, Civil Rights Center (CRC) U.S. Department of Labor, 200 Constitution Avenue, N.W. Room N-4123, Washington, DC 20210 or electronically as directed on the CRC website at www.dol.gov/crc The non-breaching party may file a complaint within thirty (30) days of the date that party learns of the alleged breach (29 CFR 38.72).

6. Program-Specific Requirements and Guidelines for Area Agencies on Aging

I. Funding

The Older Americans Act of 1965 was the first federal level initiative aimed at providing comprehensive services for older adults. It created the National Aging Network comprising the Administration on Aging in the U.S. Department of Health and Human Services on the federal level, State Units on Aging at the state level, and Area Agencies on Aging at the local level. The network provides funding - based primarily on the percentage of an area's population 60 and older - for nutrition and supportive home and community-based services, disease prevention/health promotion services, elder rights programs, the National Family Caregiver Support Program, and the Native American Caregiver Support Program. The Act was first signed into law by President Lyndon Johnson on July 14, 1965. In 2016, Congress reauthorized the Act in its entirety, effective through FY 2019. As the federally designated Area Agency on Aging (AAA), ARC receives funding from the federal Older Americans Act for much of the work performed by the agency's Aging & Independence Services Group and partners within the counties of Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Henry, and Rockdale. ARC receives these funds through the Georgia Department of Human Services, Division of Aging. Most of the funding is passed through to jurisdiction local governments and non-profits to provide the services directly to the target population. This sub-allocation process has a formula basis and is subject to a call for projects in association with the development of the Area Plan on Aging. This plan and call for projects is issued every four years.

Additional funding for the Aging and Independence Services Group is provided by the federal Social Services Block Grant, Community Care Services Program, Medicaid waiver programs, federal corporation for National and Community Service, and a range of state programs, along with a variety of public and private grants. Additional funding from DHHS may be administered by other agencies at the state level including the Georgia Department of Community Health, and the Georgia Department of Behavioral Health and Developmental Disabilities. ARC also

provide services through public/private partnerships with health care providers and insurers and housing providers

II. Monitoring

The Aging and Independence Services Group has an inhouse monitoring team. The team monitors subgrantees utilizing a tool provided by the State DHS Division of Aging Services (DAS). The team also provides the monitoring services for the 5310 subgrants described herein. For DAS services, the tool includes checking for notices of accessibility and non-discrimination policies and participant complaint procedures, and ensuring that program staff are trained in policies on non-discrimination and Americans with Disabilities Act requirements.

III. Complaints

To file a complaint directly to USDHHS, your complaint must be filed in writing by mail, fax, e-mail, or via the OCR Complaint Portal, include the name the health care or social service provider involved, and describe the acts or omissions, you believe violated civil rights laws or regulations, and be filed within 180 days of when you knew that the act or omission complained of occurred. More information can be found here: <https://www.hhs.gov/civil-rights/filing-a-complaint/complaint-process/index.html>. Email to OCRComplaint@hhs.gov or print and mail the completed complaint and consent forms to:

Centralized Case Management Operations
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Room 509F HHH Bldg.
Washington, D.C. 20201

IV. Other Requirements

In addition to the Limited English Proficiency plan described herein and found here: <https://cdn.atlantaregional.org/wp-content/uploads/lep-plan-final-2017.pdf>, ARC is subject to the DHS Language Access for Limited English Proficient and Sensory Impaired Customers Policy

#1701. ARC is responsible for providing meaningful access to LEP/SI customers as recipients of federal DHHS funding and DAS contractors. Sensory Impaired refers to individuals who are deaf, deafened, hard of hearing, blind, low vision or deaf and blind, or have manual impairments and/or speech impairments. Sensory Impairment is covered by Section 504 of the Rehabilitation Act of 1973, Title II of ADA, and Sections 307 and 321 of the Older Americans Act.

In the Area Plan on Aging, ARC lists the top three non-English speaking populations in accordance with the ARC Limited English Proficiency Plan, and describes how ARC and its providers will effectively perform outreach, deliver information, and provide services to LEP/SI consumers. The Aging and Independence Services Group has designated a Language Access Coordinator to receive DAS LEP/SI resources and training, provide PSA-level technical assistance, and offer training staff and providers as needed. The DAS Statewide Language Access Coordinator provides resources, customized training, and technical assistance Language Access Coordinators as needed. A Notice of Free Interpretation Services is posted in the reception area of the Atlanta Regional Commission offices. This notice informs the public of ARC's LEP policy.

The following contractors are available on the Team Georgia Marketplace State-wide contractors list. ARC may use any contractors that deliver services through qualified interpreters, transcriptionists, communications assistants, and other language professionals.

- Lionbridge (Approved Uses: Phone Interpreting Statewide, Face-to-Face with Speaker Phone Statewide)
- All World Language Consultants (Approved Uses: Sign-Language Interpreting Statewide)
- Ad Astra (Approved Uses: Face-to-Face Interpreting in All Regions Except Metro Atlanta; Translations Statewide)
- Interpreters Unlimited (Approved Uses: Face-to-Face Interpreting in Metro Atlanta)

The Division of Aging Services, Area Agencies on Aging, and service providers are encouraged to use Georgia Relay, a free state-funded service, for TDD/TTY calls.

ARC is required to provide the following information to the DAS Statewide Language Access Coordinator upon request:

- Number of LEP/SI clients served
- Types of language assistance provided

The Division of Aging Services recommends that Area Agencies on Aging keep the above information on record in clients' Harmony files and in separate reports.

DRAFT

Attachments

Attachment 1.1: Title VI Complaints for the Period 2016-2019 with Disposition

Title VI Complaints Last Three Years

None

DRAFT

Attachment 1.2: ARC Limited English Proficiency Plan

The Limited English Proficiency Plan, <https://atlantaregional.org/plans-reports/limited-english-proficiency-lep-plan/>

Translated versions of ARC's Title VI Complaint Form

- [English](#)
- [Spanish](#)
- [Vietnamese](#)
- [Korean](#)
- [Chinese](#)

DRAFT

Attachment 1.3: ARC Regional Community Engagement Plan

The Regional Community Engagement Report, current Regional Transportation Participation Plan, <https://atlantaregional.org/leadership-and-engagement/community-engagement/community-engagement/>

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

DRAFT

Attachment 1.4: Summary of ARC 5303 Reports

ARC 5303 Summary Report for Transportation Equity and Public Involvement

1 st Qtr. 2016	<p><u>Public Involvement</u> (ARC Cost Center 606FPT)</p> <ul style="list-style-type: none"> Finalized community engagement activities as outlined in The Region's Plan Stakeholder Engagement Program, including preparation for formal public comment and review period as well as plan adoption. <ul style="list-style-type: none"> Continued to prepare content and messaging plan for webpages to support major plan update targeted for March 2016. Coordinated efforts to prepare logistics, materials, and marketing for public meetings to support The Atlanta Region's Plan. Analyzed results and developed a summary report of the third online survey to solicit input on plan recommendations using the MetroQuest tool. Organized and hosted final two meeting in the Building Opportunities Workshop series to investigate equitable planning principles related to The Atlanta Region's Plan. Began process for conducting an evaluation of community engagement conducted during the developed of The Atlanta Region's Plan. 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. Conducted a presentation on ARC's equitable planning work related to the Regional Transportation Plan as well as outreach to millennial population at the Transportation Research Board Annual Meeting. Continued to work to reach environmental justice communities, ethnic communities and populations. Assisted with task development for SHRP2 Implementation Assistance Program. 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. Continued to update community group and local government mailing lists and continued interface with their representatives.
2 nd Qtr. 2016	<p><u>Public Involvement</u> (ARC Cost Center 606FPT)</p> <ul style="list-style-type: none"> Continued process for conducting an evaluation of community engagement conducted during the developed of The Atlanta Region's Plan.

	<ul style="list-style-type: none"> 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, as well as Clark-Atlanta Summer Transportation Institute for high school students. 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 interface with their representatives. Participated in internal working group to support integrated efforts to address issues of equity in regional planning Participated in facilitation trainings related to social equity and planning. Assisted with task development for SHRP2 Implementation Assistance Program. 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
3 rd Qtr. 2016	<p><u>Public Involvement</u> (ARC Cost Center 606FPT)</p> <ul style="list-style-type: none"> Finalized an evaluation report of community engagement conducted during the developed of The Atlanta Region's Plan. 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 Transformation Alliance Equitable Transit Oriented Development Program and Local Government Outreach Teams initiative, as well as Clark-Atlanta Summer Transportation Institute for high school students. 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 interface with their representatives. Participated in internal working group to support integrated efforts to address issues of equity in regional planning Assisted with task development and stakeholder and ARC committee meetings for SHRP2 Implementation Assistance Program. Conducted peer-exchange session with the Northwest Georgia Regional Council related to community engagement practices and activities. 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.
4 th Qtr. 2016	<p><u>Public Involvement</u> (ARC Cost Center 606FPT)</p> <ul style="list-style-type: none"> • Finalized the Title VI 2016 Plan and Program, adopted by ARC Board in October. • 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 Transformation Alliance Equitable Transit Oriented Development Program and Local Government Outreach Teams initiative, as well as Model Atlanta Regional Commission for high school students. • Continued to work to reach environmental justice communities, ethnic communities, and populations with disabilities. • Participated in internal working group to support integrated efforts to address issues of equity in regional planning, including managing a regional equity planning contract. • Continued to update community group and local government mailing lists and interface with their representatives. • Assisted with task development and stakeholder and ARC committee meetings for SHRP2 Implementation Assistance Program. • Supported external relations through engagement with the Facing Race Host Committee, Moving in the Spirit dialogues about equity, the Government Alliance for Racial Equity, and Georgians for a Healthy Future Coalition. • 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
1 st Qtr. 2017	<p><u>Public Involvement</u> (ARC Cost Center 706FPT)</p> <ul style="list-style-type: none"> • Participated in the Transportation Research Board Public Involvement Committee planning meetings and sub-committee efforts, including moderation of a panel on public involvement at TRB Annual Meeting as well as development of a research synthesis to further advance the state of practice for public engagement. • Participated in Association of Metropolitan Planning Organizations Public Involvement Working Group including development of content for the Summer Symposium. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan, including necessary public involvement for amendments to the TIP/RTP.

	<ul style="list-style-type: none"> Continued to support large agency outreach activities, including Transformation Alliance Equitable Transit Oriented Development Program and Local Government Outreach Teams initiative, as well as New Voices Global Atlanta Advisory Panel. Continued to work to reach environmental justice communities, ethnic communities, and populations with disabilities. Participated in internal working group to support integrated efforts to address issues of equity in regional planning, including managing a regional equity planning contract. Continued to update community group and local government mailing lists and interface with their representatives. Assisted with task development and stakeholder and ARC committee meetings for SHRP2 Implementation Assistance Program. Supported external relations through facilitated quarterly sessions of the Community Engagement Network and the Transportation Equity Advisory Group. Distributed the Community Engagement Network e-newsletter, including weekly distributions. <p>Responded to partner and public requests on The Atlanta Region's Plan and other planning activities</p>
2 nd Qtr. 2017	<p><u>Public Involvement</u> (ARC Cost Center 706FPT)</p> <ul style="list-style-type: none"> Participated in the Transportation Research Board Public Involvement Committee planning meetings and sub-committee efforts, including development of the Jane & John Q Public competition on public involvement for presentation at the TRB Annual Meeting. Participated in Association of Metropolitan Planning Organizations Public Involvement Working Group including presentation of the Public Involvement 101 and Environmental Justice modules at the Summer Symposium. Managed planning related to public involvement comment and review for TIP Amendment #3, including hosting two public information open houses to share information on TIP project list. Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan, including necessary public involvement for amendments to the TIP/RTP. Continued to support large agency outreach activities, including New Voices Global Atlanta Advisory Panel and Clark Atlanta Summer Transportation Institute for minority high school youth. Continued to work to reach environmental justice communities, ethnic communities, and populations with disabilities. Participated in internal working group to support integrated efforts to address issues of equity in regional planning, including managing a regional equity planning contract. Continued to update community group and local government mailing lists and interface with their representatives.

	<ul style="list-style-type: none"> Completed Advanced Environmental Justice training hosted by National Transit Institute. Supported external relations through facilitated quarterly sessions of the Community Engagement Network and the Transportation Equity Advisory Group. Distributed the Community Engagement Network e-newsletter, including weekly distributions. <p>Responded to partner and public requests on The Atlanta Region's Plan and other planning activities.</p>
3 rd Qtr. 2017	<p><u>Public Involvement</u> (ARC Cost Center 706FPT)</p> <ul style="list-style-type: none"> Participated in the Transportation Research Board Public Involvement Committee planning meetings and sub-committee efforts, including development and review of the Jane & John Q Public competition on public involvement for presentation at the TRB Annual Meeting. Participated in Association of Metropolitan Planning Organizations Public Involvement Working Group including participation in national webinars and meetings. Managed planning activities related to public involvement comment and review for TIP Amendment #3. Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan, including necessary public involvement for amendments to the TIP/RTP. Prepared and managed updates to the Regional Community Engagement Plan and Limited English Proficiency Plan, including development of staff training materials. Continued to support large agency outreach activities, including New Voices Global Atlanta Advisory Panel and the Model Atlanta Regional Commission for high school youth. Continued to work to reach environmental justice communities, ethnic communities, and populations with disabilities. Participated in internal working group to support integrated efforts to address issues of equity in regional planning, including managing a regional equity planning contract. Continued to update community group and local government mailing lists and interface with their representatives. Supported external relations through facilitated quarterly sessions of the Community Engagement Network and the Transportation Equity Advisory Group. Distributed the Community Engagement Network e-newsletter, including weekly distributions. <p>Responded to partner and public requests on The Atlanta Region's Plan and other planning activities.</p>

4 th Qtr. 2017	<p><u>Public Involvement</u> (ARC Cost Center 706FPT)</p> <ul style="list-style-type: none"> • Participated in the Transportation Research Board Public Involvement Committee planning meetings and sub-committee efforts, including development and review of the Jane & John Q Public competition on public involvement for presentation at the TRB Annual Meeting. • Participated in Association of Metropolitan Planning Organizations Public Involvement Working Group including participation in national webinars and meetings. • Managed planning activities related to public involvement comment and review for TIP Amendment #4. • Continued an internal and external discussion on how to structure future community engagement activities based on the policy directed by the Community Engagement Plan, including necessary public involvement for amendments to the TIP/RTP. • Continued to prepare and managed update to the Regional Community Engagement Plan, due for approval in 2018. • Finalized the agency update to the Limited English Proficiency Plan, including management of staff training process. • Continued to support large agency outreach activities, including New Voices Global Atlanta Advisory Panel and the Model Atlanta Regional Commission for high school youth. • Continued to work to reach environmental justice communities, ethnic communities, and populations with disabilities. • Participated in internal working group to support integrated efforts to address issues of equity in regional planning, including managing a regional equity planning contract. • Continued to update community group and local government mailing lists and interface with their representatives. • Supported external relations through facilitated quarterly sessions of the Community Engagement Network and bimonthly meetings of the Transportation Equity Advisory Group. • 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>Participated in various FHWA advisory panels focused upon public involvement and environmental justice techniques and best practices.</p>
---------------------------------	--

1 st Qtr. 2018	<p><u>Public Involvement</u> (ARC Cost Center 806FPT)</p> <ul style="list-style-type: none">• Prepared draft update to the Regional Community Engagement Plan to reflect agency evolution, federal transportation policy and best state of practice and began conducting stakeholder focus groups to review document.• Convened ongoing meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups.• Convened Community Engagement Network to discuss community engagement best practices and update to Regional Community Engagement Plan.• Prepared RFP to solicit consultant assistance to develop strategic community engagement plans in support of The Atlanta Region's Plan (2020).• Developed content and published the biweekly Community Engagement Network newsletter.• Continued to manage interns to support division activities, including public involvement.• Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning.• Participated as member of FHWA Advisory Committee for Techniques for Improved Engagement in Public Involvement.• Participated as advisory member of FHWA Environmental Justice and Changing Demographics Study.• Participated in Transportation Research Board Public Involvement Committee and Association of Metropolitan Planning Organization Public Involvement Working Group to contribute to state of the practice.• Responded to partner and public requests on The Atlanta Region's Plan and other planning activities.
---------------------------------	---

<p>2nd Qtr. 2018</p>	<p>Public Involvement (ARC Cost Center 806FPT)</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.
---	--

3 rd Qtr. 2018	<p>Public Involvement (ARC Cost Center 806FPT)</p> <ul style="list-style-type: none">Continued to edit draft update to the Regional Community Engagement Plan to reflect agency evolution, federal transportation policy and best state of practice based upon stakeholder feedback.Convened ongoing meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups.Began the development of strategic community engagement plans in support of The Atlanta Region's Plan (2020).Developed content and published the biweekly Community Engagement Network newsletter.Continued to manage interns to support division activities, including public involvement.Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning.Managed public comment process for updates to the TIP and responded to partner and public requests on The Atlanta Region's Plan and other planning activities, including public involvement process for the Transportation Improvement Program Amendment.Participated as member of FHWA Advisory Committee for Techniques for Improved Engagement in Public Involvement.Participated as advisory member of FHWA Environmental Justice and Changing Demographics Study.Assisted the Association of Metropolitan Planning Organization (AMPO) Public Involvement Working Group.Coordinated planning efforts for ARC's transportation and technology summit, ConnectATL.
---------------------------------	---

4 th Qtr. 2018	<p>Public Involvement (ARC Cost Center 806FPT)</p> <ul style="list-style-type: none">Continued to edit draft update to the Regional Community Engagement Plan to reflect agency evolution, federal transportation policy and best state of practice based upon stakeholder feedback, in preparation for early 2019 adoption.Convened ongoing meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups.Finalized the development of strategic community engagement plans in support of The Atlanta Region's Plan (2020).Developed content and published the biweekly Community Engagement Network newsletter.Continued to manage interns to support division activities, including public involvement.Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning.Managed public comment process for updates to the TIP and responded to partner and public requests on The Atlanta Region's Plan and other planning activities, including public involvement process for the Transportation Improvement Program Amendment.Assisted the Association of Metropolitan Planning Organization (AMPO) Public Involvement Working Group by providing planning and communication resources and leading webinars to contribute to knowledge sharing amongst MPOsWrapped up planning efforts for ARC's 2018 transportation and technology summit, ConnectATL, and contributed to the development of ARC's ITS/TSMO engagement strategy as continuation of this effort.
---------------------------------	---

<p>1st Qtr. 2019</p>	<p><u>Public Involvement</u> (ARC Cost Center 806FPT)</p> <ul style="list-style-type: none">• Prepared the final draft update to the Regional Community Engagement Plan to reflect agency evolution, federal transportation policy and best state of practice based upon stakeholder feedback, in preparation for adoption in second quarter.• Convened ongoing meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups.• Began coordinating internal staff and external services to implement the strategic community engagement plans in support of The Atlanta Region's Plan (2020).• Developed content and published the biweekly Community Engagement Network newsletter.• Continued to manage interns to support division activities, including public involvement.• Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning.• Managed public comment process for updates to the TIP and responded to partner and public requests on The Atlanta Region's Plan and other planning activities, including public involvement process for the Transportation Improvement Program Amendment.• Assisted the Association of Metropolitan Planning Organization (AMPO) Public Involvement Working Group by providing planning and communication resources and leading webinars to contribute to knowledge sharing amongst MPOs.• Participated in the Public Involvement and Metropolitan Policy and Planning Committees of TRB, including preparation of a Centennial paper on the state of the committee.
---	---

2 nd Qtr. 2019	<p><u>Public Involvement</u> (ARC Cost Center 906FPT)</p> <ul style="list-style-type: none"> • Prepared the final draft update to the Regional Transportation Community Engagement Plan to reflect agency evolution, federal transportation policy and best state of practice based upon stakeholder feedback, in preparation for adoption in June. Also conducted 45-day public review period in support of this Regional Transportation Community Engagement Plan. • Convened ongoing bi-meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups. • Continued to coordinate internal staff and external services to implement the strategic community engagement plans and activities in support of The Atlanta Region's Plan (2020). • Designed conversation content and promotional plan to generate participation in ARC's Civic Dinners conversation, Future Focus: ATL, focused on understanding the public's thoughts about the next 30 years and how we should prepare the transportation system for our region's future. • Began early planning for content and material design for a series of regional open houses to share plans and generate feedback related to The Atlanta Region's Plan (2020). • Coordinated content to update ARC's websites with new draft materials being developed for The Atlanta Region's Plan (2020). • Coordinated final preparations and promotional plans for the launch of ARC's online scenario planning game, Future Focus: ATL to generate public feedback about the long-range future of the Atlanta region and the ensuing transportation needs for policy and projects. • Developed content and published the biweekly Community Engagement Network newsletter. • Continued to manage interns to support division activities, including public involvement. • Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning. • Managed public comment process for updates to the TIP and responded to partner and public requests on The Atlanta Region's Plan and other planning activities, including public involvement process for the Transportation Improvement Program Amendment. • Developed and presented peer training on environmental justice and public involvement to the Association of Metropolitan Planning Organizations bi-annual symposium. • Participated in 2020 Annual Meeting and 2021 Equity Conference planning sessions as a member of the newly developed national Joint Sub-Committee on Equity (as well as Public Involvement and Environmental Justice Committees) as part of the Transportation Research Board's work to support transportation planning and public involvement.
---------------------------------	--

- Presented on two different FHWA sponsored webinars about public involvement best practices to support performance measures as well as long-range transportation planning.
- Presented the final draft update to the Regional Community Engagement Plan to transportation and agency committees for final approvals. This updated and newly adopted plan reflects agency evolution, federal transportation policy and best state of practice based upon stakeholder feedback.
- Convened ongoing bi-meetings of the Transportation Equity Advisory Group to build partnerships with local environmental justice groups.
- Continued to coordinate internal staff and external services to implement the strategic community engagement plans in support of The Atlanta Region's Pan (2020).
- Developed content and published the biweekly Community Engagement Network newsletter.
- Continued to manage interns to support division activities, including public involvement.
- Continued to participate in internal working group to support integrated efforts to address issues of equity in regional planning.
- Participated in 2020 Annual Meeting and 2021 Equity Conference planning sessions as a member of the newly developed national Joint Sub-Committee on Equity (as well as Public Involvement and Environmental Justice Committees) as part of the Transportation Research Board's work to support transportation planning and public involvement.

Attachment 1.5: ARC's Environmental Justice Analysis Methodology

Information on ARC's Environmental Justice Analysis Methodology, updated in 2018 can be found here: <https://cdn.atlantaregional.org/wp-content/uploads/arc-equity-methodology-june2019.pdf>

DRAFT