

2014

Title VI - Limited English Proficiency Plan



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MARTA 2014 Limited English Proficiency Plan

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Notice to Subrecipients

LIMITED ENGLISH PROFICIENCY PLAN

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

I acknowledge that a copy of the MARTA 2014 Limited English Proficiency Plan has been provided to the organization listed below and I, the undersigned, have read the contents and fully understand the LEP Plan obligations and responsibilities.

Signature

Date

Organization Name

I. Introduction

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

Most individuals living in the United States read, write, speak, and understand English. There are many individuals, however, for whom English is not their primary language. For instance, based on the 2010 census, 8% (or 23.5 million people) of the United States population, age 5 and older (or 286.5 Million people), speak English less than very well. Of those individuals, 70.05% speak Spanish; 14.47% speak Indo-European; 12.34% speak Asian/Island Pacific; and 3.14% speak an unspecified language.

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

II. Purpose

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

The MARTA LEP plan presents the sources of authority for LEP plan requirements and instructions for determining if the threshold to show the need for languages assistance is present. The plan will provide guidelines for MARTA and its subrecipients to meet these needs and define the role of the MARTA Title VI program in that process. Specifically, this plan will outline how to collect LEP information and how to analyze that information.

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

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

III. Authority and Guidance

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

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

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

IV. Title VI/LEP Policy Statement

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

V. Executive Summary

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

Highlights of LEP Programing:

- MARTA's Office of Diversity and Equal Opportunity has expanded its work initiatives with community groups including Asian-based community resource organizations.

- A “How to Ride MARTA” presentation in English and four other languages: Spanish, Vietnamese, Korean, Japanese, and Russian. These are posted on the MARTA website and also distributed to community-based organizations (CBOs) that serve low income, minority, and LEP populations upon request.
- Asian-American month 2013 was celebrated with cultural awareness and educational events for MARTA employees.
- DEO collaborated with LEP-related organizations by participating in the World Refugee Day event (2011 & 2012), which was sponsored by a host of community agencies including the Clarkston Community Center, an Atlanta metropolitan area non-profit agency, which serves nearly 20,000 people who are mostly refugees.
- DEO participated in Clarkston National Night-Out Event in celebration of LEP populations (2012) sponsored by a host of metro community organizations.
- Notice distributions to 64,500 in the Hispanic/Latino community for each MARTA public hearing or community meeting (three-year estimate).
- Distribution of 4,800 MARTA public hearing and meeting notices through the Asian American Language Services agency to 14 Chinese-, Korean-, and Vietnamese-related agencies for each MARTA public hearing or community meeting that MARTA conducted (three-year estimate).
- MARTA Riders Guides are available in two languages: English and Spanish. The Guides can be found at MARTA offices, station kiosks, and can be downloaded from the MARTA website. Optional languages are available upon request.
- The use of Language Line Translation Services is available via telephone.
- MARTA system-wide bus announcements are made in English and Spanish.
- All MARTA bus timetables are produced in English and Spanish and are available on the MARTA website.
- MARTA places Spanish language signage in select MARTA stations, as appropriate, for specific events and to announce construction or other situations important to customer safety.
- Multi-language assistance option for MARTA callers.
- Call center bilingual operators are available.
- Service modifications are available in Spanish and other languages, such as Vietnamese, Korean, and Chinese upon request.
- Pending initiative to add Asian languages (Chinese, Vietnamese, and Korean) to the

new MARTA Breeze Card Machine upgrades.

- Trip planning in Spanish.
- Translators at community public meetings, as appropriate.
- Ride with Respect publications were created with Spanish in the back and are also available in other languages upon request.
- Emergency exit information on buses in Spanish.
- MARTA bus schedules with narrative information in English and Spanish.
- Bus detour signs in Spanish, as appropriate.
- Google Translator: A website machine translator service which enables users to translate most (or all) vital materials into six languages (Spanish, Chinese, Japanese, Korean, French, and German).
- Translated materials at community public meetings, as appropriate.
- ADA announcements on buses in English and Spanish.
- Direct access for LEP customers, who call MARTA's Call Center, to be connected to a telephonic interpretation service with linguists who speak over 200 languages.
- Some front-line staff uses visual translation cards and other tools to communicate with individuals with Limited English proficiency.

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

- The 2010 Census report reflected that 929,155 of Georgia residents are foreign born. This makes up 9.7% of the state's population. From 2000 to 2010, the foreign born population increased by 61% in Georgia. The census reports that 12.9% of the state's population speaks a language other than English at home and 5.9% of the population speaks English less than "very well".
- The top spoken language other than English is Spanish, spoken by 675,924 persons or 7.6% of the total population of Georgia.
- The top spoken languages other than English in the Atlanta metropolitan area are Spanish, Korean, Vietnamese, Chinese, and African languages.¹
- Within Fulton and DeKalb counties combined, 228,888 residents or 14.3% of the population are foreign-born.

¹ Source: Migration Policy Institute, "Limited English Proficient Individuals in the United States: Number, Share, Growth and Linguistic Diversity" (2011), p.8.

- Within Fulton and DeKalb counties combined, 16.1% of the population speaks a language other than English at home. In addition, 7.1% of this population speaks English less than “very well”.
- Spanish is spoken by 117,508 residents of Fulton and DeKalb counties combined or 7.5% of the population.
- MARTA has not collected data to document the frequency of contact by LEP persons with its services. However there is fragmented data to estimate the frequency of contact.
- Less than 2% of all calls to MARTA’s Customer Care Center or visits to MARTA’s website involved the use of language assistance services.
- LEP customers who call the MARTA Service Customer Care Center have direct access to Spanish-speaking customer service representatives.

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

According to the 2010 U.S. Census, almost 25 million people in the entire country reported they speak English less than “very well”. The number of persons reporting that they do not speak English at all or do not speak English “very well” grew by 250% from 2000 to 2010.

VI. LEP Population Overview

The diversity of the Atlanta metropolitan population continues to grow and change with Asian and Hispanic young adults. Census Bureau statistics show that in 2010, 5.9% of the population in Georgia identified themselves as someone who speaks English less than “very well”.

This population statistic is only likely to grow in the future. Therefore, it is critical that MARTA utilize innovative and proactive methods to engage people from different cultures, backgrounds, and businesses in the public involvement aspect of planning and project development and other program areas such as: service modifications, transit development, and other programs or services involving the public.

Providing access to LEP persons to MARTA programs, services, and activities through translation of publication and oral language assistance is essential to business development. MARTA is committed to making its services and programs available to all persons, including the LEP population, as part of its mission “to ensure equal access to transportation.” Based on this commitment, MARTA makes designated publications (Breeze card, Community Exchange, Public Hearing, closing of major routes etc.) available in languages other than English and provides interpretation services to persons who are not proficient in English.

Demographics

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

The most recently completed fiscal year's QOS Survey database is used as the source for information on the demographic attributes of MARTA riders. The survey consists of face-to-face interviews with randomly selected patrons on randomly selected vehicle trips (bus or rail car) or with randomly selected certified paratransit users. The demographic information collected, which is used as a basis for this analysis, includes the respondent's race and/or ethnicity, household income (in \$10,000 increments), and fare payment method.

Data is collected using:

- The new I-Speak card – Added new questions to reflect verbal and non-verbal refusals;
- Bilingual surveyors;
- Written surveys in languages other than English; and
- The new census standards for data collection.

Although the majority of LEP in the MARTA service area speak Spanish, the Asian population is growing at a rapid pace. There are over 45,000 Asians, between the ages of 25 and 34, in the Atlanta metropolitan area, according to the 2010 Census. Slightly less than 5% of Atlanta's population is Asian. It should be noted that the growth in the Asian population in Georgia ranked fifth among all states from 2000 to 2010, according to the Census Bureau. The Asian population increased by 83% during that timeframe in Georgia. The Atlanta metropolitan area now ranks among the top 20 cities in terms of Asian population in the country.

VII. The Four-Factor Analysis

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

Service Area

MARTA operates almost exclusively in Fulton and DeKalb counties, with bus service to destinations in Cobb County (Six Flags over Georgia and the Cumberland Transfer Center next to the Cumberland Mall) and a single rail station in Clayton County at Hartsfield-Jackson

Atlanta International Airport. The MARTA service population is about 1.7 million in the City of Atlanta and Fulton and DeKalb Counties. The average total daily ridership for the system (bus and rail) is 450,000 passengers.

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

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

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

**Languages Spoken at Home for the Population of 5 Years Old and Over
Source: U.S. Census 2008-2012 American Community Survey**

	DeKalb County, Georgia		Fulton County, Georgia	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	643,574	+/-30	866,715	+/-56
Speak only English	523,954	+/-2,439	724,608	+/-3,203
Spanish or Spanish Creole:	57,252	+/-1,370	62,208	+/-1,519
Speak English "very well"	23,947	+/-1,254	30,729	+/-1,419
Speak English less than "very well"	33,305	+/-1,190	31,479	+/-1,415
French (incl. Patois, Cajun):	5,444	+/-820	7,047	+/-810
Speak English "very well"	4,271	+/-692	5,676	+/-701
Speak English less than "very well"	1,173	+/-300	1,371	+/-339
French Creole:	1,339	+/-444	2,011	+/-818
Speak English "very well"	935	+/-316	1,565	+/-667
Speak English less than "very well"	404	+/-199	446	+/-235
Italian:	584	+/-194	907	+/-320
Speak English "very well"	440	+/-175	798	+/-308
Speak English less than "very well"	144	+/-82	109	+/-81
Portuguese or Portuguese Creole:	947	+/-287	3,020	+/-866
Speak English "very well"	821	+/-267	1,679	+/-587
Speak English less than "very well"	126	+/-91	1,341	+/-506

German:	1,947	+/-366	2,863	+/-506
Speak English "very well"	1,702	+/-347	2,416	+/-468
Speak English less than "very well"	245	+/-101	447	+/-157
Yiddish:	159	+/-156	129	+/-111
Speak English "very well"	136	+/-154	98	+/-81
Speak English less than "very well"	23	+/-28	31	+/-45
Other West Germanic languages:	190	+/-100	800	+/-238
Speak English "very well"	190	+/-100	731	+/-230
Speak English less than "very well"	0	+/-31	69	+/-73
Scandinavian languages:	203	+/-105	486	+/-199
Speak English "very well"	203	+/-105	454	+/-175
Speak English less than "very well"	0	+/-31	32	+/-55
Greek:	635	+/-258	639	+/-187
Speak English "very well"	558	+/-245	556	+/-176
Speak English less than "very well"	77	+/-58	83	+/-71
Russian:	1,562	+/-490	4,165	+/-913
Speak English "very well"	881	+/-346	2,470	+/-578
Speak English less than "very well"	681	+/-238	1,695	+/-499
Polish:	214	+/-121	578	+/-182
Speak English "very well"	176	+/-105	435	+/-151
Speak English less than "very well"	38	+/-40	143	+/-99
Serbo-Croatian:	663	+/-383	497	+/-240
Speak English "very well"	359	+/-283	303	+/-182
Speak English less than "very well"	304	+/-205	194	+/-115
Other Slavic languages:	266	+/-161	819	+/-244
Speak English "very well"	144	+/-101	613	+/-185
Speak English less than "very well"	122	+/-129	206	+/-122
Armenian:	0	+/-31	208	+/-208
Speak English "very well"	0	+/-31	150	+/-160
Speak English less than "very well"	0	+/-31	58	+/-65
Persian:	707	+/-349	2,549	+/-587
Speak English "very well"	317	+/-147	1,503	+/-388
Speak English less than "very well"	390	+/-252	1,046	+/-357

Gujarati:	1,248	+/-492	1,445	+/-407
Speak English "very well"	870	+/-389	1,303	+/-377
Speak English less than "very well"	378	+/-163	142	+/-108
Hindi:	2,668	+/-600	5,909	+/-994
Speak English "very well"	1,900	+/-478	4,976	+/-893
Speak English less than "very well"	768	+/-289	933	+/-384
Urdu:	590	+/-217	1,194	+/-410
Speak English "very well"	477	+/-181	992	+/-365
Speak English less than "very well"	113	+/-62	202	+/-104
Other Indic languages:	4,249	+/-915	3,238	+/-665
Speak English "very well"	1,475	+/-350	2,756	+/-601
Speak English less than "very well"	2,774	+/-764	482	+/-200
Other Indo-European languages:	1,249	+/-445	1,235	+/-445
Speak English "very well"	994	+/-388	898	+/-429
Speak English less than "very well"	255	+/-157	337	+/-265
Chinese:	6,235	+/-765	9,657	+/-1,098
Speak English "very well"	2,597	+/-368	5,238	+/-767
Speak English less than "very well"	3,638	+/-621	4,419	+/-597
Japanese:	1,215	+/-395	1,514	+/-402
Speak English "very well"	655	+/-223	889	+/-240
Speak English less than "very well"	560	+/-348	625	+/-230
Korean:	3,639	+/-703	7,907	+/-1,149
Speak English "very well"	1,448	+/-326	3,765	+/-691
Speak English less than "very well"	2,191	+/-521	4,142	+/-698
Mon-Khmer, Cambodian:	467	+/-293	0	+/-31
Speak English "very well"	242	+/-175	0	+/-31
Speak English less than "very well"	225	+/-162	0	+/-31
Hmong:	180	+/-199	86	+/-138
Speak English "very well"	143	+/-180	40	+/-65
Speak English less than "very well"	37	+/-57	46	+/-74
Thai:	308	+/-218	921	+/-619
Speak English "very well"	167	+/-131	680	+/-579
Speak English less than "very well"	141	+/-172	241	+/-178

Laotian:	190	+/-137	169	+/-107
Speak English "very well"	175	+/-137	129	+/-99
Speak English less than "very well"	15	+/-23	40	+/-36
Vietnamese:	4,631	+/-927	1,479	+/-473
Speak English "very well"	1,754	+/-407	692	+/-272
Speak English less than "very well"	2,877	+/-651	787	+/-253
Other Asian languages:	3,199	+/-748	8,099	+/-1,251
Speak English "very well"	1,544	+/-452	6,274	+/-1,039
Speak English less than "very well"	1,655	+/-583	1,825	+/-503
Tagalog:	558	+/-220	669	+/-251
Speak English "very well"	313	+/-125	565	+/-223
Speak English less than "very well"	245	+/-148	104	+/-79
Other Pacific Island languages:	119	+/-69	773	+/-459
Speak English "very well"	85	+/-46	329	+/-139
Speak English less than "very well"	34	+/-43	444	+/-433
Navajo:	10	+/-15	0	+/-31
Speak English "very well"	10	+/-15	0	+/-31
Speak English less than "very well"	0	+/-31	0	+/-31
Other Native North American languages:	81	+/-79	17	+/-26
Speak English "very well"	81	+/-79	17	+/-26
Speak English less than "very well"	0	+/-31	0	+/-31
Hungarian:	62	+/-50	157	+/-107
Speak English "very well"	50	+/-46	121	+/-94
Speak English less than "very well"	12	+/-19	36	+/-41
Arabic:	1,454	+/-500	2,758	+/-661
Speak English "very well"	1,041	+/-396	1,757	+/-476
Speak English less than "very well"	413	+/-198	1,001	+/-371
Hebrew:	437	+/-183	1,139	+/-477
Speak English "very well"	424	+/-177	1,075	+/-473
Speak English less than "very well"	13	+/-25	64	+/-68
African languages:	14,148	+/-1,371	4,701	+/-964
Speak English "very well"	8,252	+/-1,048	3,473	+/-819
Speak English less than "very well"	5,896	+/-761	1,228	+/-371

"very well"				
Other and unspecified languages:	571	+/-406	114	+/-70
Speak English "very well"	215	+/-143	96	+/-66
Speak English less than "very well"	356	+/-331	18	+/-24

U.S. Census Language Groups Identified as Speaking English Less Than "Very Well"	DeKalb County Number Identified In LEP Language Group	DeKalb County Languages Spoken In Order of Most Spoken	Fulton County Number Identified In LEP Language Group	Fulton County Languages Spoken In Order of Most Spoken
	33,305	#1-Spanish	31,479	#1 Spanish
	3,638	#2-Chinese	4,419	#2-Chinese
	2,877	#3-Vietnamese	4,142	#3-Korean
	2,191	#4-Korean	1,695	#4-Russian
	1,173	#5-French	1,371	#5-French
	768	#6-Hindi	1,001	#6 Arabic

	681	#7-Russian	933	#7-Hindi
	404	#8 French Creole	787	#-8 Vietnamese

Non-identified Language Groups Speaking English Less Than “Very Well” *	DeKalb County	Fulton County
Asian dialects or languages	3,199 Individuals who speak Asian languages which were not specifically identified by the Census	8,099 Individuals who speak Asian languages which were not specifically disclosed or identified by the Census.
African dialects or languages	5,896 Individuals who speak African languages which were not specifically disclosed or identified by the Census.	4,701 Individuals who speak African languages which were not specifically disclosed or identified by the Census.
Indic dialects or languages	2,774 Individuals who speak Indic languages which were not specifically disclosed or identified by the Census.	3,328 Individuals who speak Indic languages which were not specifically disclosed or identified by the Census.

Data Analysis

The above Census table, for the MARTA service area for DeKalb County, shows that 33,305 Spanish-language speakers, 3,638 Chinese-language speakers, 2,877 Vietnamese-language speakers, and 2,191 Korean-language speakers, fall under the category of those who speak English less than “very well” of the total population of persons five years old and older. These top four language groups were followed by 1,173 French-language speakers and 768 Hindi-language speakers, who speak English less than “very well”. Also notable are 5,896 individuals who speak African Languages, 3,199 individuals who speak unidentified Asian languages, and 2,774 individuals who speak other non-identified Indic languages. All of the individuals from the aforementioned non-identified language groups reported speaking English “less than very well”.

Fulton County Census data shows that 31,479 Spanish-language speakers, 4,419 Chinese-language speakers, 4,142 Korean-language speakers, and 1,695 Russian-language speakers, fall under the category of those who speak English less than “very well” of the total population of persons five years old and older. These top four language groups were followed by 1,371 French-language speakers and 1001 Arabic-language speakers who speak English less than “very well”. Also notable are the 8,099 individuals who speak other non-identified Asian Languages, 4,701 individuals who speak other non-identified African Languages, and

3,328 individuals who speak other non-identified Indic languages. All of the individuals from the aforementioned non-identified language groups reported speaking English “less than very well”.

**LEP Statistics FY14 Quality of Service Survey: Contact with MARTA
Primary Language Spoken at Home²**

	Contact %
English	92.6%
Spanish	3.6%
Albanian	0.1%
Amharic (Ethiopia)	0.2%
Arabic	0.5%
Bengali	0.2%
Chinese (Simple)	0.3%
Farsi	0.1%
French	0.6%
German	0.1%
Hindi	0.4%
Hmong (SE Asia)	0.1%
Japanese	0.1%
Korean	0.1%
Nepali (Indo-Tibet)	0.1%
Portuguese	0.1%
Russian	0.1%
Turkish	0.1%
Vietnamese	0.0%
Patois	0.2%
Other	0.5%

² The QOS began asking about language spoken at home in mid-August, 2013.

Primary Language Spoken at Home (Condensed)

English	92.5%
Spanish	3.6%
Other	3.9%
Total	100%

MARTA has also examined prior experiences with LEP individuals by reviewing calls to the customer service telephone line, request for translation services, and LEP access to MARTA's website.

**2011 Usage
January 2011 to December 31, 2011**

Languages	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
SPANISH	2506	308	8.1 minutes	98.0%
TURKISH	21	2	10.5 minutes	0.8%
PUNJABI	8	1	8.0 minutes	0.3%
HINDI	6	1	6.0 minutes	0.2%
FARSI	5	2	2.5 minutes	0.2%
BENGALI	4	1	4.0 minutes	0.2%
TAMIL	3	1	3.0 minutes	0.1%
KOREAN	2	1	2.0 minutes	0.1%
SINHALESE	2	1	2.0 minutes	0.1%
MALAY	1	1	1.0 minute	0.0%
Total-10 languages	2558	319	8.0 minutes	

2012 Usage
January 2012 to December 31, 2012

Languages	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
SPANISH	2041	258	7.9 minutes	98.3%
NEPALI	18	1	18.0 minutes	0.9%
VIETNAMESE	5	1	5.0 minutes	0.2%
ARABIC	4	1	4.0 minutes	0.2%
FRENCH	4	2	2.0 minutes	0.2%
KOREAN	3	1	3.0 minutes	0.1%
BURMESE	2	1	2.0 minutes	0.1%
Total-7 languages	2077	265	7.8 minutes	

2013 Usage
January 1, 2013 to May 31, 2013

Languages	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
SPANISH	744	94	7.9 minutes	98.7%
VIETNAMESE	6	1	6.0 minutes	0.8%
MANDARIN	3	1	3.0 minutes	0.4%
FRENCH	1	1	1.0 minute	0.1%
Total-4 languages	754	97	7.8 minutes	

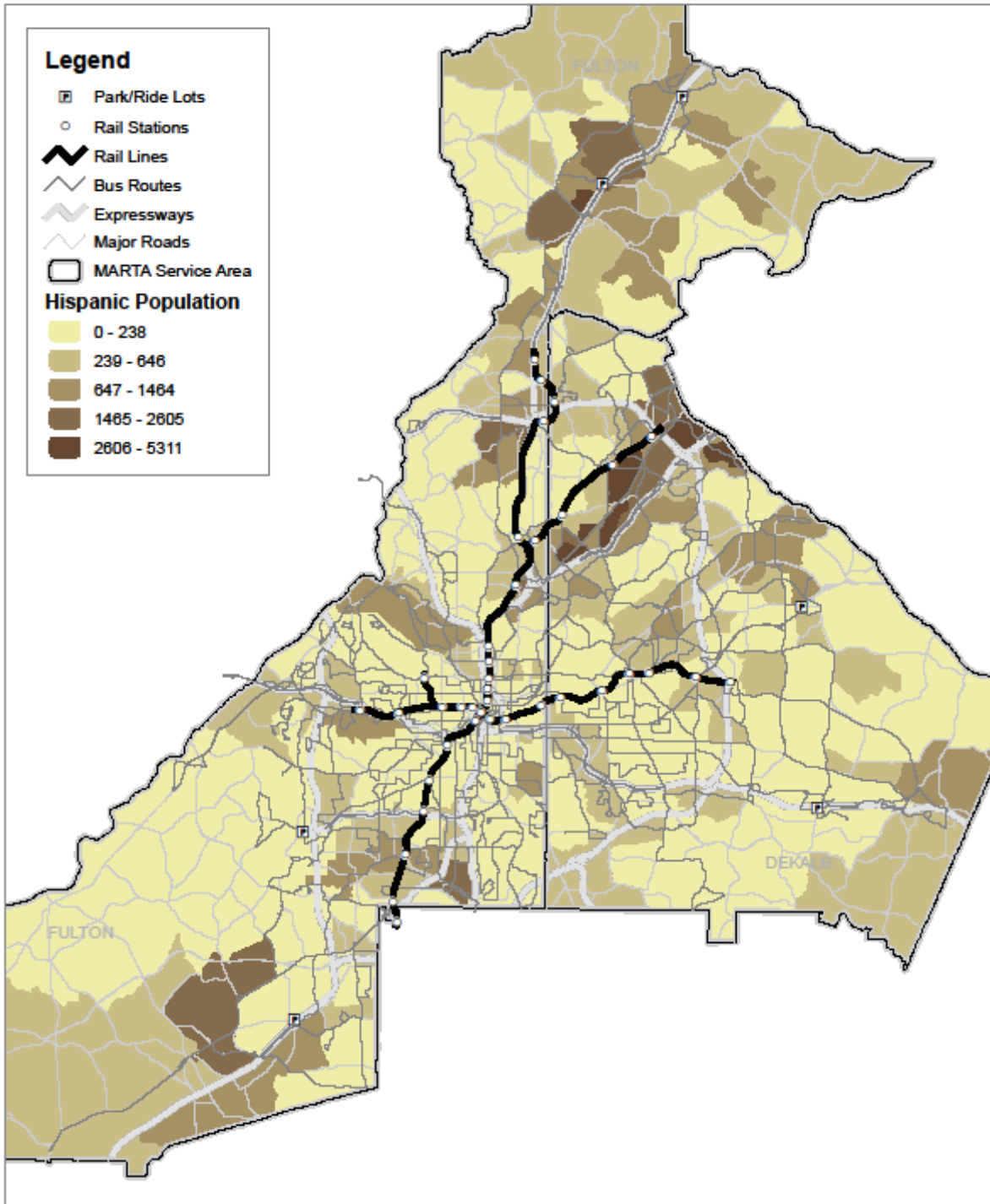
In relation to recent LEP access to the MARTA website, the following recent hits for language translations via the google translator option occurred between March-April 2014.

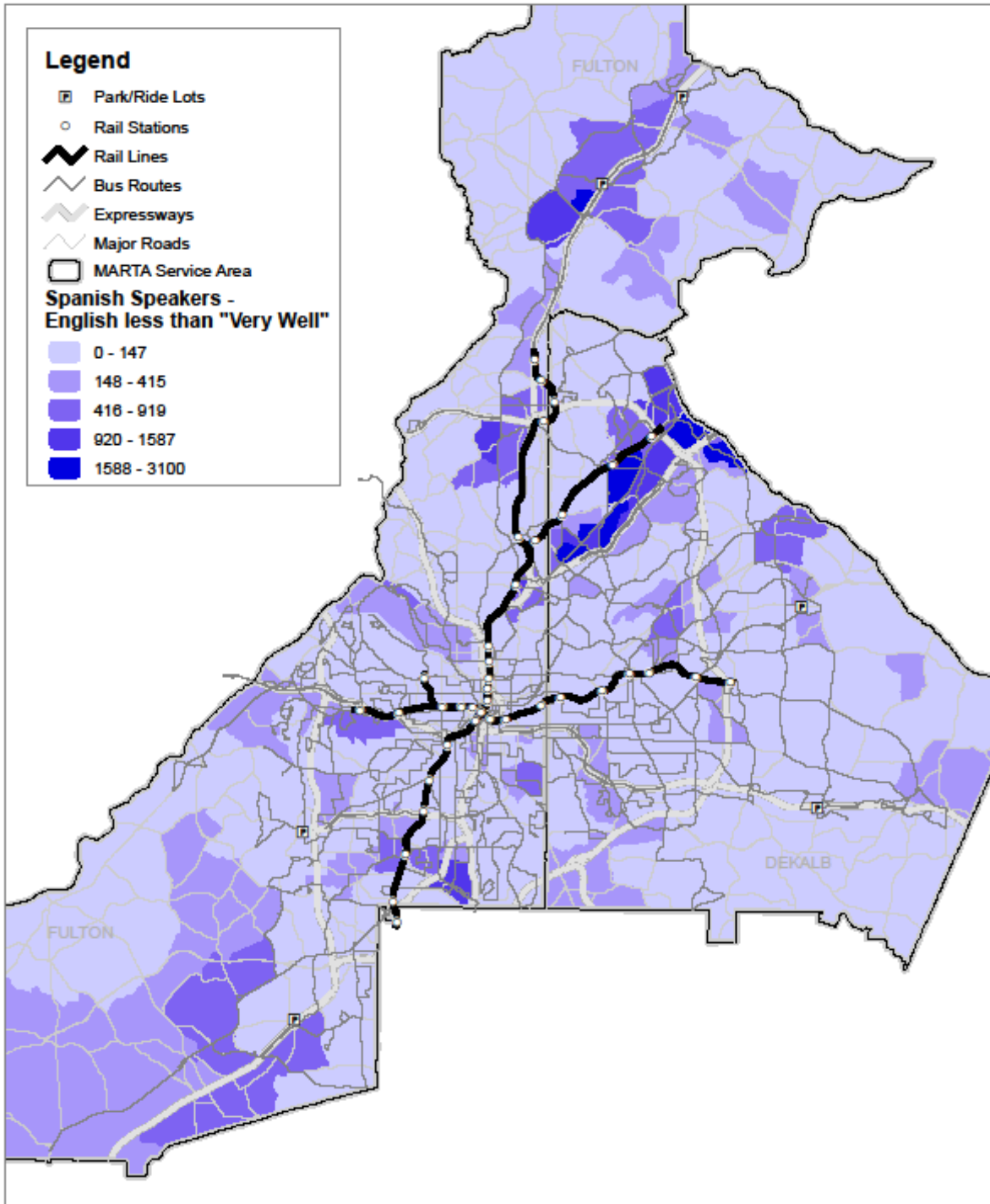
Language	Recent Number of Website Hits
Spanish*	1609
German	928
Chinese*	995
French	654
Korean*	426
Japanese	216

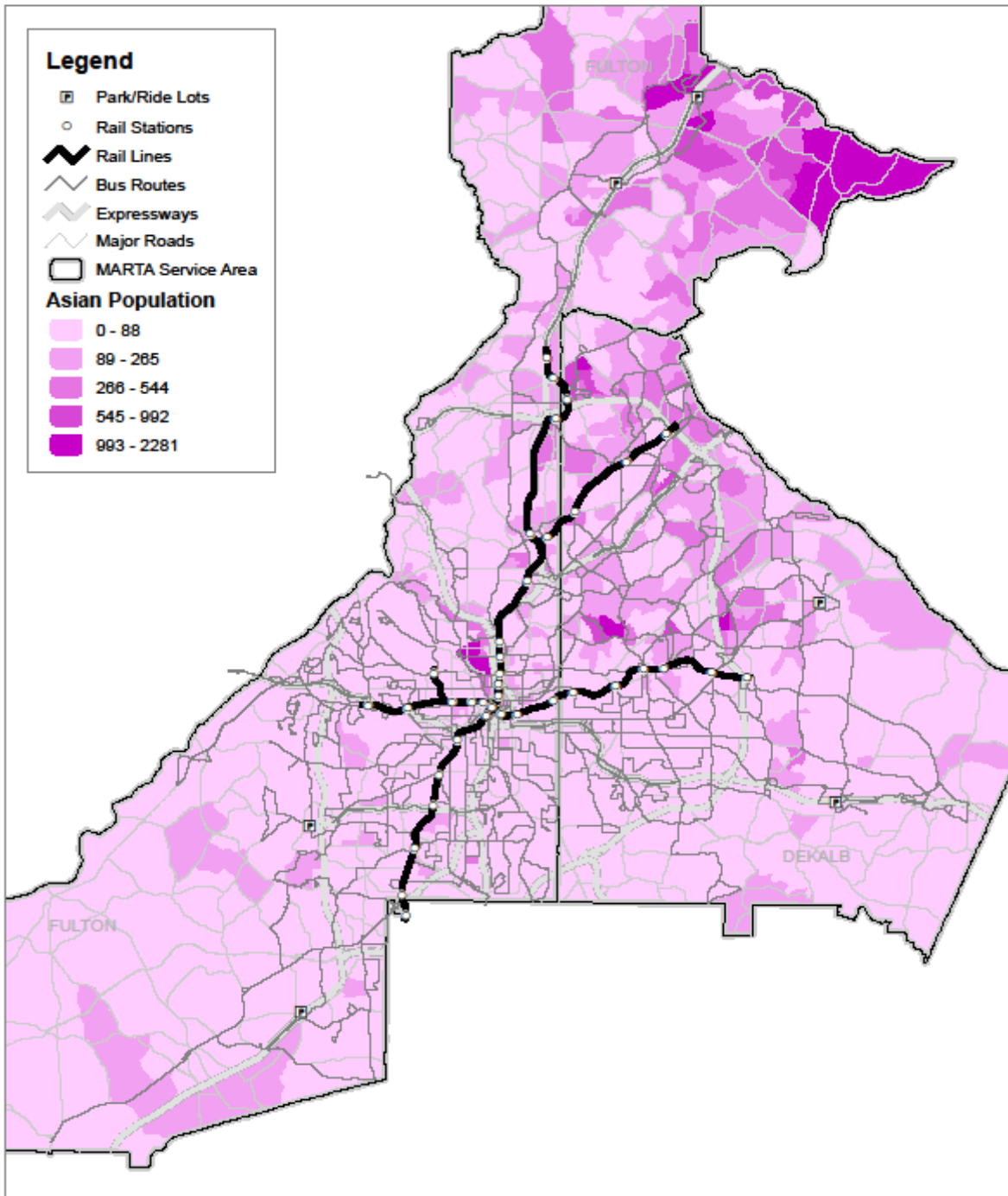
*Identified as one of the top 10 languages spoken in the MARTA service area.

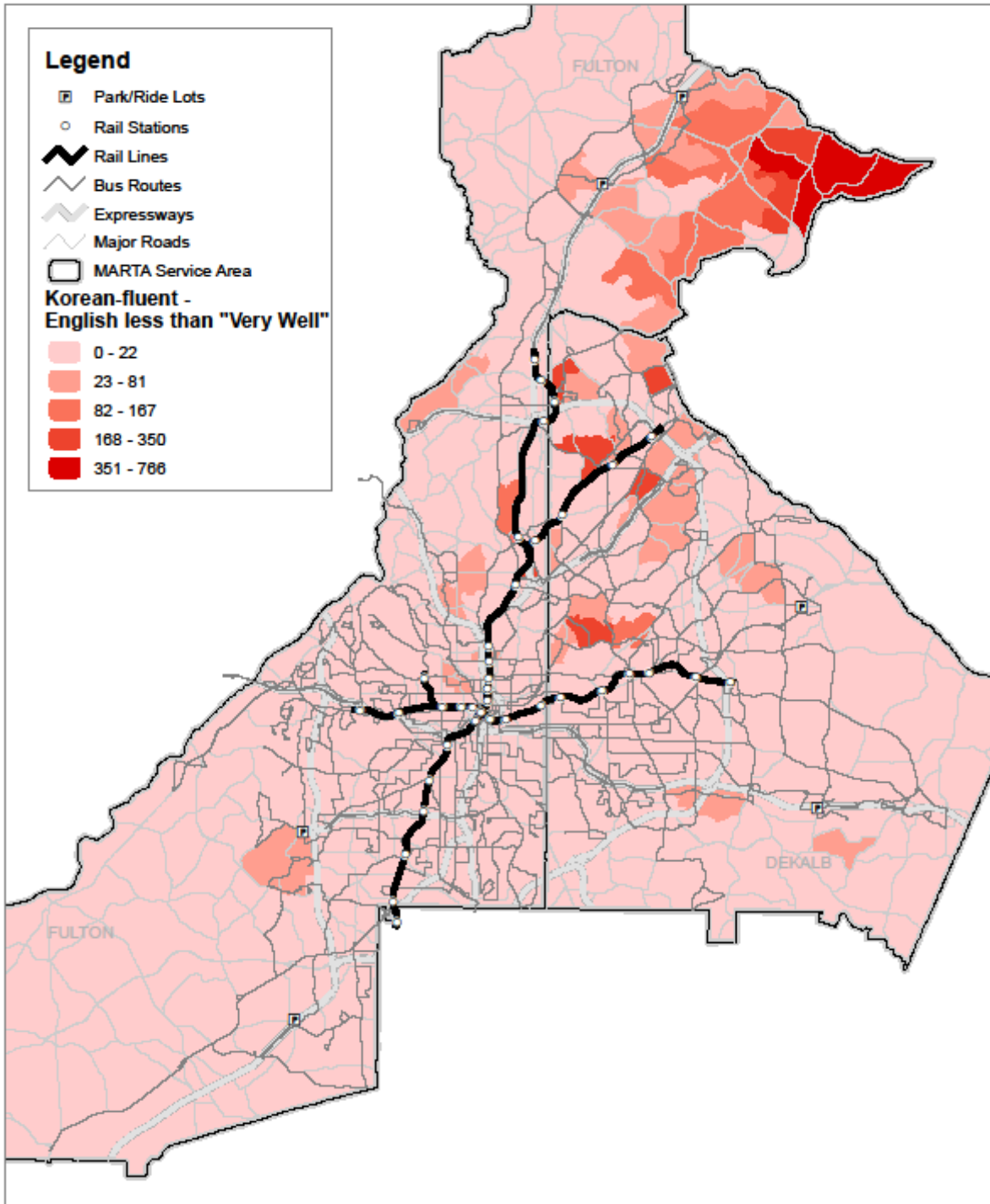
Concentrations of LEP Persons within the Service Area

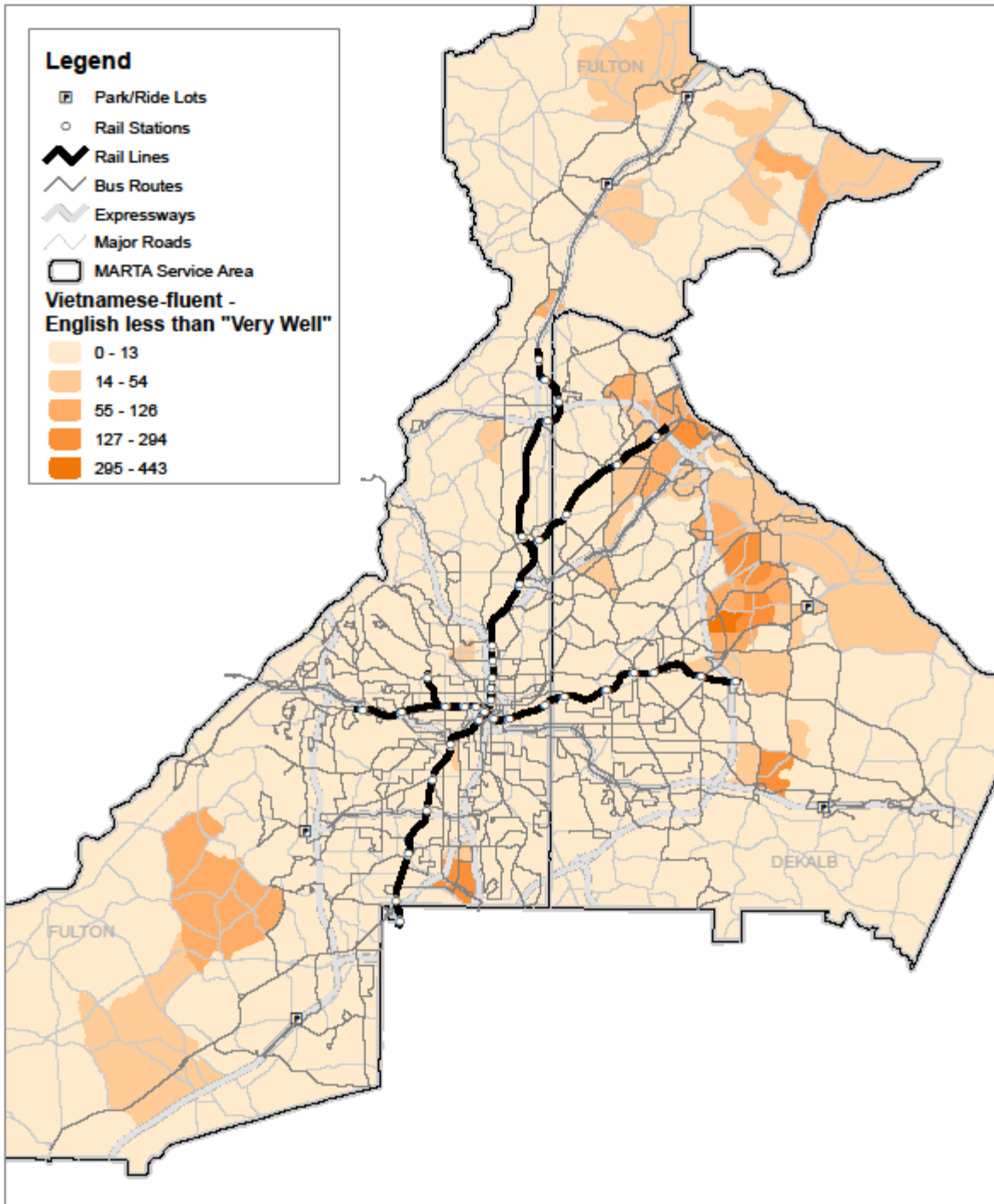
In addition to U.S. Census data, MARTA also used internal Geographic Information System (GIS) mapping software to identify where LEP populations and persons speaking different languages within the MARTA service area; and concentrations of LEP populations around specific stations and transit routes with focus on the Hispanic/Spanish and Asian groups, who were statistically identified as the primary two LEP population segments.

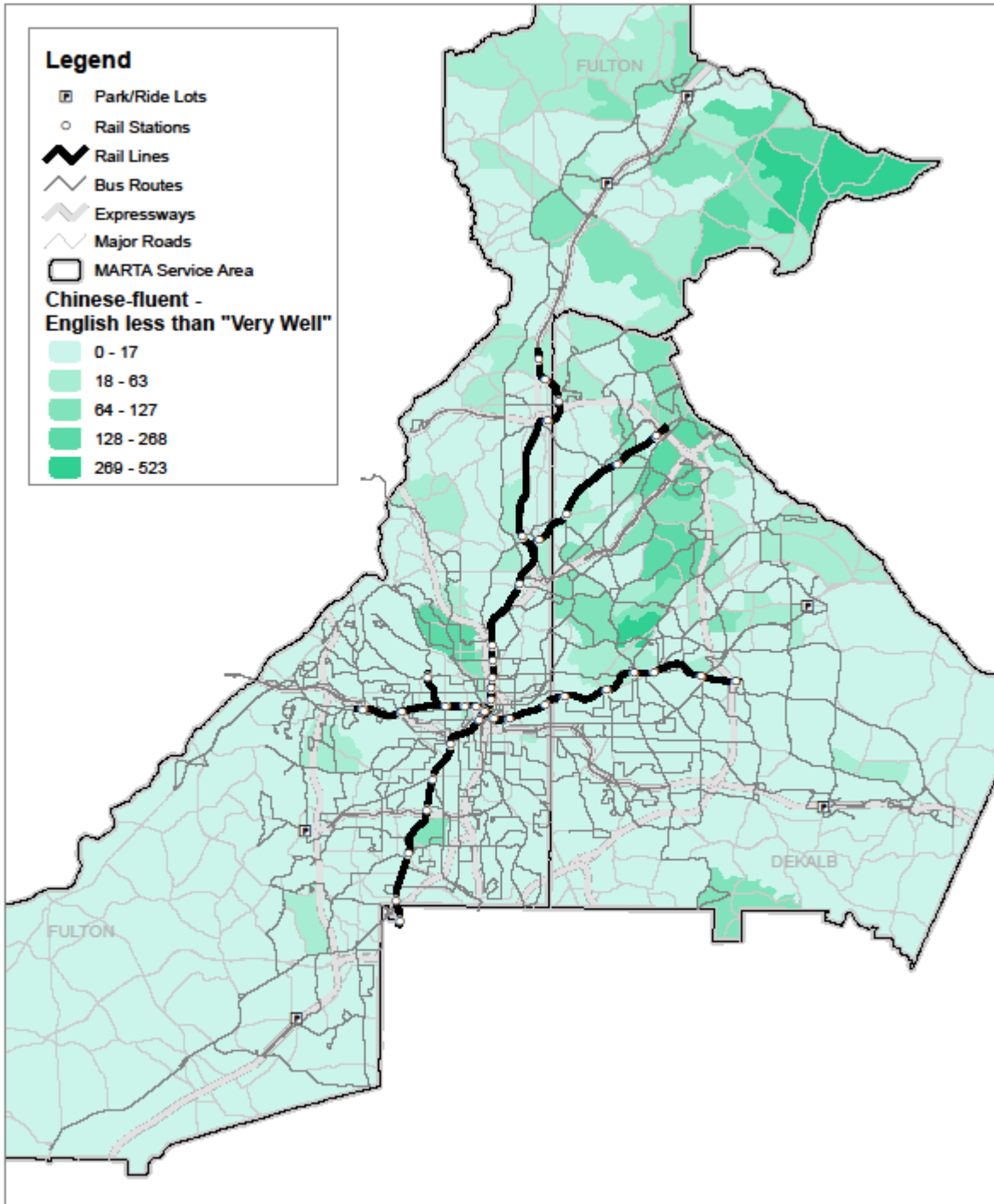












Community Organizations

MARTA has identified LEP-related organizations and developed an LEP contact list. This list expands as new contacts are found.

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

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

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

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

Customer Service Center Data

During Fiscal Year 2013, the Customer Care Center comprised of two call centers (Customer Service Center and Customer Information Center), received 3,697 calls requesting a Spanish-speaking or other language operator. MARTA currently employs eight or 2.7% Spanish-speaking operators in its Customer Care Center. Fewer callers, ranging from a low of 0 to 1 caller call per month, requested alternative (non-Spanish) language services. During this time period, the Customer Care Center handled 56,606 calls per month. This means that the frequency of encounter by the MARTA Call Centers of persons that require language assistance is approximately 6.5% of all calls.

Quality of Service Survey Data

Quality of Service Survey Data in Relation To LEP Contact with MARTA

Have you called MARTA during the past 30 days?³

	English	Spanish	Other
Yes	137	0	3
	18.3%	0.0%	9.2%
No	610	21	25
	81.7%	100.0%	90.8%
Total	747	21	28
	100.0%	100.0%	100.0%

If contacted MARTA, who did you call?

	English	Spanish	Other
Customer Information Center	90	0	0
	65.5%	0.0%	0.0%
Customer Service Center	44	0	3
	32.0%	0.0%	100.0%
Other Office	8	0	0
	6.0%	0.0%	0.0%
Total	137	0	3
	100.0%	0.0%	100.0%

³ The Quality of Service Survey contains too many questions to include in one questionnaire. To make the survey experience less burdensome for respondents, questions related to contact with MARTA are alternated with questions about nuisance behaviors. In the first half of FY14, 747 respondents who answered the language question were also asked about recent contact with MARTA.

Language Line Translation Services Usage

The Language Line Services is a company that is contracted to provide MARTA with a consistent 24-hour a day 7 days a week rapid access to high quality interpreters for more than 200 languages. The following reflects the overall usage of the language line:

2011 Usage (January 2011 to December 31, 2011)

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	2506	308	8.1 minutes	98.0%
Total-10 languages	2558	319	8.0 minutes	

2012 Usage (January 2012 to December 31, 2012)

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	2041	258	7.9 minutes	98.3%
Total-7 languages	2077	265	7.8 minutes	

2013 Usage to Date (January 1, 2013 to May 31, 2013)

Most Used Language	Total Minutes	Total Calls	Average Length of Calls	Percentage of Total Minutes
Spanish	744	94	7.9 minutes	98.7%
Total-4 languages	754	97	7.8 minutes	

Assessment of the Language Line Use

The vast majority of the LEP-related translation service calls were funneled through or came directly to the Customer Service Center, which handles customer complaints and general feedback. The second largest volume of calls came through the Customer Information Center which provides bus and rail scheduling as well as trip itinerary information. Emergency Services directly used the language line nine times in 2011. Other areas identified only by phone extensions, accessed the line 16 times in the last three years. The primary language use is Spanish.

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

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

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

MARTA envisioned that LEP communities (i.e., Hispanic, Chinese, Korean, and Vietnamese) would require additional outreach, in relation to community forums and public hearings. For public hearings and community forums, MARTA provides or acquires translators and announcements in alternative formats and multiple languages to ensure that information is properly conveyed to respective LEP populations. In addition, MARTA advertises hearings in primary languages used by LEP populations including Spanish, Chinese, Korean, and Vietnamese.

Due to the importance of police services, MARTA Police personnel must be able to communicate with people from LEP populations. Therefore, the department has a plan language access policy in place (General Order 81-102) to ensure communication with individuals who speak Spanish, Korean, Chinese, Vietnamese, and language dialects from Africa. If an officer speaks only English and the other person speaks only their native language, the communication problem is obvious. This General Order describes how MARTA can use a translation service provided by the Language Line Services.

If a MARTA Police employee is confronted with a person who must be interviewed or questioned about a situation being handled by the Police Department and that person does not speak English; and if there is no local interpreter readily available, a translation service is available through Language Line Services. This service can be accessed through MARTA Police Communications and is available 24 hours per day every day of the year.

The officer will call Communications and explain the language problem. The native language of the person involved should be identified, if possible. Communications will contact Language Line Services to arrange for the services of an interpreter. The interpreter will then assist the person conducting the questioning or interview by providing translation services. This assistance will be provided via the telephone.

Factor 4: The Resources Available to the Recipient and Costs

Resources

Oral Interpretation Services

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

Written Translation Services

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

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

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

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

In response to the needs of the Spanish-speaking population, the largest language-minority population MARTA serves, MARTA routinely translates publications into Spanish, commonly provides interpretation services in Spanish, and has Spanish-speaking customer-service representatives at its customer care call centers.

A total of \$35,484 for written translation services in LEP newspapers and publications, in relation to public hearings and community meetings, was spent for the previous three years as follows:

Translation Source	Event	Date	Cost
Mundo Hispanico Newspaper (Spanish). Cost of translation included in cost to run ads.	Bus Mods Public Hearings	January 24, 2011	\$1,452
	Bus Mods Public Hearings	March 21-24, 2011	\$2,070
	Budget Public Hearings	May 16-17, 2011	\$1,706
	Beltline Meeting	June, 2012	\$796
	Budget Public Hearings	May 15-17, 2012	\$2,180
	Industry Day II:	August 7, 2012	\$545
	Bus Mods Public Hearings	January 24-26, 2012	\$1,452
	Budget Public Hearings	May 14-16, 2013	\$853
	Bus Mods Public Hearings	January 22-24, 2013	\$726
	The 'Q' Elimination Public Hearing	June 4, 2013	\$1,136
	The 'Q' Eliminated Ads.	August 24, 2013	\$1,136
	Bus/Rail Mods Public Hearing	September 19, 2013	\$568
	Title VI Public Meetings:	December 9, 10, 12, 2013	\$855
Total			\$15,475

Asian American Language Services [AALS] (Chinese, Korean, Vietnamese). Cost of translation included in cost to typeset, print, and distribute fliers to all community locations.	Bus Mods Public Hearings	January 24, 2011	\$2,057
	Bus Mods Public Hearings	March 21-24, 2011	\$2,777
	Budget Public Hearings	May 16-17, 2011	\$2,441
	Budget Public Hearings	May 15-17, 2012	\$1,476
	Bus Mods Public Hearings	January 24-26, 2012	\$1,650
	Budget Public Hearings	May 14-16, 2013	\$3,395
	Bus Mods Public Hearings	January 22-24, 2013	\$1,947
	The 'Q' Elimination Public Hearing	June 4, 2013	\$1,433
	The 'Q' Eliminated Ads	August 24, 2013	\$1,433
	Title VI Public Meetings AALS:	Dec. 9, 10, 12, 2013	\$1,400
Total for AALS		20,009	\$20,009
Grand Total for MUNDO and AALS			\$35,484

A three year total of \$30,616 for the translation of written materials for a variety of MARTA projects was as follows:

Year	Totals for Written Translations
2011	15,648
2012	7,478
2013	7,490
	Grand Three Year Total: \$30,616

In relation to the language line, MARTA is billed by the minute (85 cents a minute for Spanish and 99 cents a minute for all other languages). The estimated total for usage for the last three years is as follows:

Year	Totals for Language Line Translation Usage
2011	\$4,662
2012	\$3,791
2013	\$1,378
	Grand Three Year Total: \$9,831

Cost Effective Practices for Providing Language Services

In order to reduce overall agency costs, MARTA used telephone conferencing interpretation services, volunteer interpreters, google translator and resources pooling among departments..

VIII. The Updated Provision of LEP Services

MARTA's Four-Factor Analysis has provided the basis for the development of updated language assistance services which include a mix of services currently provided as follows:

Providing Notice to the LEP Community

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

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

Translation of Vital Documents

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

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

It is important to make an assessment as to the population percentage and the frequency and importance of the contact when considering the potential for translating these documents. The departments most likely to encounter the need to translate vital documents are Government Relations, Planning, Diversity and Equal Opportunity, Marketing, and Contracts and Procurement.

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

- Complaint processes to include Title VI
- Bus and rail schedules
- Notices of proposed public hearings regarding proposed transportation plans, projects, or changes.
- Emergency transportation information

Whether or not a document (or the information it solicits) is “vital”, will depend on the importance of the program, information, encounter, or service involved and the consequence to the LEP person if the information in question is not accurate or timely disseminated. For instance, applications for a bicycle safety course would not generally be considered vital, although access to the driving handbook will be a vital document.

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

Sometimes very large documents may include both vital and non-vital information. For example, a document title and phone number for obtaining more information may be critical, but the document itself may contain additional non-vital information. In a case like this, vital

information may be provided in an alternative language and an LEP person might be advised of how to request a translation of the entire document as needed

Language Assistance Services

The Language Line Services is a company that is contracted to provide MARTA with a consistent 24-hour a day 7 days a week rapid access to high quality interpreters for about 200 languages including the primary languages spoken in the MARTA service area: Spanish, Chinese, Korean, Vietnamese, language dialects from Africa including Swahili and Indic language groups including Hindi.

In addition, MARTA utilizes:

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

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

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

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

Providing language assistance in some areas may also mean training staff to avoid using acronyms or industry jargon when communicating with LEP individuals. Although the use of an interpreter who is qualified is essential, it does not necessarily mean formal certification as an interpreter is required.

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

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

the program;

- Understand and follow confidentiality and impartiality rules to the same extent as the LEP person for whom they are interpreting or to the extent that their position requires; and
- Understand and adhere to their role as interpreter without deviating into a role as counselor, legal advisor, or other inappropriate role.

Accessing Interpreting Services

Language interpretation services are accessed through the following protocols:

- The Customer Information Center is required to have a minimum of one bilingual operator on duty, per shift, to assist with requests from MARTA's LEP population.
- Telephone communication with LEP Callers: When a non-bilingual employee receives a call and determines that the caller is LEP, the call-taker shall inform the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to extension 2244 or 5290 so that the appropriate customer service representative may assist the caller.
- If no available and appropriate customer service representative is present, the call-taker will contact a volunteer employee. Once a three-way call is established between the call-taker, the LEP caller, and the interpreter, the call-taker will follow the standard operating procedures used for the call center.
- Note: MARTA will take reasonable steps to develop in-house language in the Customer Service Center by hiring personnel with specific language skills.
- Responding MARTA Personnel Responsibilities: MARTA personnel in the field in need of interpretation services will attempt to identify the LEP individual's primary language through the use of the language identification card. A sample section of this document is found below and the full document can be located at: <http://www.dol.gov/oasam/programs/crc/ISpeakCards.pdf>.
- Difficult Circumstances: MARTA personnel are expected to follow the general procedures outlined in this plan; however difficult circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual MARTA personnel.
- Family, Friends and Bystanders: In other than difficult circumstance, MARTA personnel should only use family, friends, or bystanders for interpreting in very informal, non-confrontational contexts and only to obtain basic information at the request of the LEP individual. Using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. Barring difficult circumstance, MARTA personnel should not use minor children to provide interpreter services.

I-Speak Cards

MARTA will expand the use of I-Speak Cards to identify the languages needed by LEP persons who encounter front-line personnel. In addition, new forms of communication cards will be developed as a tool to enhance communication between LEP populations and front-line personnel.

2004 Census Test		2010 Census	
LANGUAGE IDENTIFICATION FLASHCARD			
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic	
<input type="checkbox"/>	Եթե կարդաք կամ խոսեք հայերեն, նշե՛ք այս քառակուսին:	2. Armenian	
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বক্সে দাগ দিন।	3. Bengali	
<input type="checkbox"/>	លុយបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian	
<input type="checkbox"/>	Motka i kahhon ya yangin ūntūngnu' manaitai pat ūntūngnu' kumentos Chamorro.	5. Chamorro	
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese	
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	7. Traditional Chinese	
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian	
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech	
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch	
<input type="checkbox"/>	Mark this box if you read or speak English.	11. English	
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بلد هستید این مربع را علامت بزنید.	12. Farsi	

DB-3309

U.S. DEPARTMENT OF COMMERCE
Economic and Statistical Administration
U.S. CENSUS BUREAU

LEP Service Recommendations

To meet the needs of the substantial and growing LEP population in the MARTA service area,

MARTA will employ the following additional strategies and actions over the next three years:

- Provide ongoing written notifications in the following languages (Spanish, Chinese, Korean, and Vietnamese) as a standard practice.
- Add Chinese, Korean and Vietnamese language options to the MARTA Breeze Card machines as part of the future system upgrades.
- Adopt standard operating procedures (SOPs) to be used by all MARTA front-line employees and contractors when encountering a LEP customer. The SOP may differ depending on the mode of transportation.
- Expand and enhance the written translation services available on MARTA's website to add Vietnamese. Currently, all of the major spoken languages are included with the exception of Vietnamese.
- Develop new I-Speak Cards to include phrases and symbols to enhance communication between LEP populations and front-line personnel who encounter LEP populations.
- Continue to distribute MARTA multilingual materials, such as the MARTA Riders Guide, bilingual bus schedules, and "How to Ride MARTA" to community organizations that assist the LEP population.
- Expand the MARTA mobility training program initiative to enhance rider training opportunities for LEP persons.
- Increase MARTA's internal bilingual capabilities by identifying bilingual employees to provide oral language assistance, as needed.
- MARTA should also continue its efforts to recruit and hire bilingual front-line employees by participating in community job fairs and advertising in publications and media that reach diverse populations. Consider increased use of pictographs or other symbols throughout the MARTA system to convey messages on how to safely use MARTA.
- Develop and implement frontline staff training and supervisory training on MARTA LEP policies and procedures. Enhance current mandatory training in customer service and diversity awareness to include cultural sensitivity to LEP persons.
- In order to monitor the future translation service needs for LEP populations, MARTA will track expenditures related to providing language assistance in the future.
- Offer Spanish and potentially other language resources such as Rosetta Stone to employees.
- Based on the historical usage, changing demographics and projected costs, MARTA will set aside budgetary dollars in order to meet compliance goals and fulfill the

provisions of the LEP Plan. Such budgetary dollars shall include resources for: general ongoing translation services, interpreter services, signage, the translation of vital agency documents and other services as needed to ensure full inclusion for LEP populations. The DEO Office will be provided with an annual fiscal LEP budget and have the primary role in facilitating the distribution of resources for LEP groups.

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

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

IX. Staff Roles and Responsibilities

A. Departmental and Executive Management Team (EMT) Roles and Responsibilities

In collaboration with the Office of Diversity and Equal Opportunity (DEO), MARTA departmental directors and managers shall:

1. Develop written procedures where needed, to ensure consistent service delivery.
2. Orient new employees as to compliance with LEP requirements.
3. Evaluate their respective business units to determine and document the frequency and nature of public contact from LEP populations.
4. Report LEP-related data annually to the Office of Diversity and Equal Opportunity.

The Executive Management Team shall:

1. Be responsible for overall LEP compliance requirements in their respective business units.
2. Ensure their respective business units determine and document the frequency and nature of public contact from LEP populations.
3. Evaluate current practices to determine what opportunities exist for improved

services to LEP populations.

4. Communicate any systemic-wide concerns in relation to LEP populations to DEO resolution.

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

B. The Office of Diversity and Equal Opportunity (DEO)

Office of Diversity and Equal Opportunity will be the primary point of contact for MARTA.

This office has the following specific responsibilities:

1. In coordination with Title VI/LEP Committee, and department managers, determine the most appropriate level and type of language assistance to provide.
2. In conjunction with the training department, provide training and technical assistance in understanding and implementing LEP requirements and assisting in developing departmental procedures to ensure compliance.
3. Provide assistance in evaluating local population demographics to determine compliance requirements.
4. Collect LEP-related data for Federal reporting purposes.
5. Respond to and investigate all complaints of discrimination based on disability or national origin as they relate to language assistance.
6. Maintain MARTA's Limited English Proficiency (LEP) policy and keeping it current and relevant.
7. Overseeing, along with development of the translations and printing of critical forms into languages most often and significantly encountered in MARTA.
8. Working along with departments and offices and with the Office of Information Technology, to ensure that the agency's electronic systems include alerts and information on the client's language needs.

C. TITLE VI/LEP Committee

The Executive Director of Diversity and Equal opportunity has selected MARTA personnel to serve on a committee (the Title VI/LEP Committee) to evaluate and monitor LEP services performed by MARTA. One of the major goals of the committee is to ensure that LEP individuals can meaningfully access services and benefits offered by MARTA. The committee, led by MARTA's Office of Diversity and Equal Opportunity, is comprised of representatives from the following MARTA departments: Human Resources, Planning,

Communication and External Affairs, Marketing, Customer Service, the Law Department, Operations, Mobility Services, Police Services, and Safety Department. The responsibilities of the LEP Committee shall include reporting to the agency regarding the activities noted below:

- **Study LEP Service** - Obtain concrete data regarding LEP service through a comprehensive analysis of the service provided by MARTA. (Factors to be reviewed are outlined below.)
- **Identify Critical Insufficiencies** - Inform MARTA of any deficiency in LEP service which precludes meaningful access by LEP individuals to the programs administered by MARTA. Such notification is required to assure appropriate consideration in preparation of annual budget submissions.
- **Evaluate Suggested Improvements** - Review suggestions for improvement to LEP service and determine whether implementation is practical, economical, and consistent with the mission of MARTA.
- **Implement Economical Suggestions** - Monitor the implementation of suggested improvements which can be accomplished at a nominal cost to MARTA.
- **Prioritize Suggested Improvements** - Prioritize those suggestions which cannot be implemented at a nominal cost to MARTA. Consideration should be given to the number or proportion of LEP individuals who will benefit from the suggested improvement, the cost to MARTA, and whether the change can be implemented in a manner consistent with, and without unduly burdening, the fundamental mission of MARTA.

X. TRAINING STAFF

The Office of Diversity and Equal Opportunity (DEO) will ensure that employees are knowledgeable about MARTA's obligations to provide meaningful access to information and services for LEP persons. Therefore, DEO will ensure that employees having contact with the public have experience in the following areas:

- Policies and procedures of language access.
- Resources available to determine the language needs of a customer.
- Resources available to ensure that access is provided in a timely and effective manner.
- Working effectively with language interpreters.
- Available documents that have been translated into languages other than English, and Policies and procedures for "informed choice."
- Types of language services available.
- How staff can obtain those services.

- How to respond to LEP callers.
- How to respond to written communication from LEP persons.
- How to respond to LEP individuals who have in-person contact with staff.

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

Sub-recipient Monitoring and Training

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

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

Based on the MARTA screening process of sub-recipients, MARTA is not aware of any complaints against sub-recipients since the last LEP Plan was submitted in 2009. To ensure ongoing compliance, MARTA has heightened its efforts to increase sub-recipient tracking and monitoring and provided technical assistance by:

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

XI. LEP Plan Distribution

The LEP Plan objectives and requirements will be:

1. Distributed to all MARTA supervisors who have direct contact with the public.

2. Available in the Office of Diversity and Equal Opportunity.
3. Posted on MARTA's website, www.itsmarta.com.
4. Distributed to sub-grant recipients.
5. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.

XII. Monitoring and Updating the LEP Plan

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

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

XIII. Compliance and Reporting

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

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

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

XIV. How Is A Discrimination Complaint Filed?

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

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color or national origin may by himself or by a representative, file a written complaint with MARTA within 180 days after the date of the alleged discrimination at: MARTA's Office of Diversity and Equal Opportunity, 2424 Piedmont Road, NE, Atlanta, GA 3032403330, 404-848-5000 (voice). Failure to file within 180 days may result in dismissal of the inquiry or complaint. In addition, any person who believed himself, herself or any specific class of persons to be subjected to discrimination on the basis

of race, color or national origin, may by himself or by a representative, file a complaint with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination at: Federal Transit Administration (FTA), Office of Civil Rights, 230 Peachtree Street, N.W., Suite 800, Atlanta, GA 30303, (404) 865-5600 (voice).

The complaint should contain:

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

a. How Will A Complaint Be Resolved?

Within five days of receiving a written complaint, MARTA's DEO Office will acknowledge receipt of the complaint the DEO Office will investigate and make recommendations for resolving the complaint as deemed appropriate.

b. Prohibition Against Retaliation for Filing A Complaint

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

XV. Conclusion

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

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

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

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