

Title VI

Limited English Proficiency Plan

Update 2024



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MARTA 2024

Limited English Proficiency Plan

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I. Notice to Subrecipients

LIMITED ENGLISH PROFICIENCY PLAN

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

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

Signature

Date

Organization Name

II. Introduction

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

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

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

III. Purpose

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

The MARTA LEP plan presents the sources of authority for LEP plan requirements and instructions for determining if the threshold to show the need for language 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 to serve the LEP population in the MARTA service area.

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

IV. Authority and Guidance

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

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

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

V. Title VI/LEP Policy Statement

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

VI. Executive Summary

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

Highlights of LEP Programing:

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

are also available in other languages upon request.

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

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

- The 2019 American Community Survey 1-year Estimates reflect that 1,091,880 of Georgia residents are foreign born. This makes up 10.3% of the state’s population. From 2010 to 2019, the foreign-born population increased by 15.7% in Georgia. The census reports that 13.5% of the state’s population speaks a language other than English at home and 5.1% of the population speaks English less than “very well”.
- The top spoken language other than English is Spanish, spoken by 807,522 persons or 7.6% of the total population of Georgia.
- The top spoken languages other than English in Georgia are Spanish, Vietnamese (64,718 persons), ‘French, Haitian, or Cajun’ (55,675 persons), Chinese (52,962 persons), and Korean (42,362 persons).
- Within the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), 293,928 persons or 13.9% of the population are foreign born.
- Within the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), 16.0% of the population speaks a language other than English

at home. In addition, 5.5% of this population speaks English less than “very well”.

- Spanish is spoken by 143,631 persons in the MARTA Service Area (Fulton, DeKalb and Clayton counties combined), or 6.8% of the population. The top spoken languages other than English are Spanish, Chinese (19,360 persons), French, Haitian, or Cajun (16,584 persons), Vietnamese (14,217 persons), and Korean (9,584 persons). In addition, 117,121 persons, or 5.5% of population in the MARTA Service Area have limited English proficiency (LEP; speak English less than “Very Well”).
- The top spoken languages among the LEP population in the MARTA Service Area are Spanish (61,115 persons), Chinese, including Mandarin and Cantonese (9,850 persons), Vietnamese (8,696 persons), French, Haitian, or Cajun (4,596 persons), and Korean (4,335 persons).
- Less than 2% of all calls to MARTA’s Customer Care Center or visits to MARTA’s website involved the use of language assistance services.
- LEP customers who call the MARTA Service Customer Care Center have direct access to Spanish-speaking customer service representatives.

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

VII. LEP Population Overview

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

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

Demographics

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

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

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

VIII. The Four-Factor Analysis

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

Service Area

The MARTA service area population (defined as a $\frac{3}{4}$ mile buffer around all MARTA fixed route service) consists of 1.708 million people and includes Fulton County (800,119 service area population), DeKalb County (673,805 service area population) and Clayton County (234,456 service area population). The total population for the three counties is 2.140 million which is 25% greater than MARTA's defined service area population. For the month of April 2024, the average daily ridership for the system (bus, rail, Streetcar, and Mobility) was 178,547 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.

Table 1: Languages Spoken at Home for the Population of 5 Years Old and Over (Source: US Census Bureau ACS 2018 to 2022 5-Year Estimates, Table C16001)

	FULTON COUNTY		DEKALB COUNTY		CLAYTON COUNTY	
	Population Estimate	Margin of Error (+/-)	Population Estimate	Margin of Error (+/-)	Population Estimate	Margin of Error (+/-)
Total:	1,003,989	±65	710,886	±77	275,123	±46
Speak only English	838,282	±4,647	573,244	±4,146	221,681	±1,850
Spanish:	59,133	±2,102	51,850	±1,447	32,627	±1,010
Speak English "very well"	38,062	±1,922	26,468	±1,662	17,965	±1,040
Speak English less than "very well"	21,071	±1,659	25,382	±1,498	14,662	±1,042
French, Haitian, or Cajun:	9,172	±1,507	8,176	±1,087	2,048	±782
Speak English "very well"	7,460	±1,294	5,933	±877	1,407	±655
Speak English less than "very well"	1,712	±596	2,243	±533	641	±364
German or other West	4,229	±956	2,097	±548	415	±293

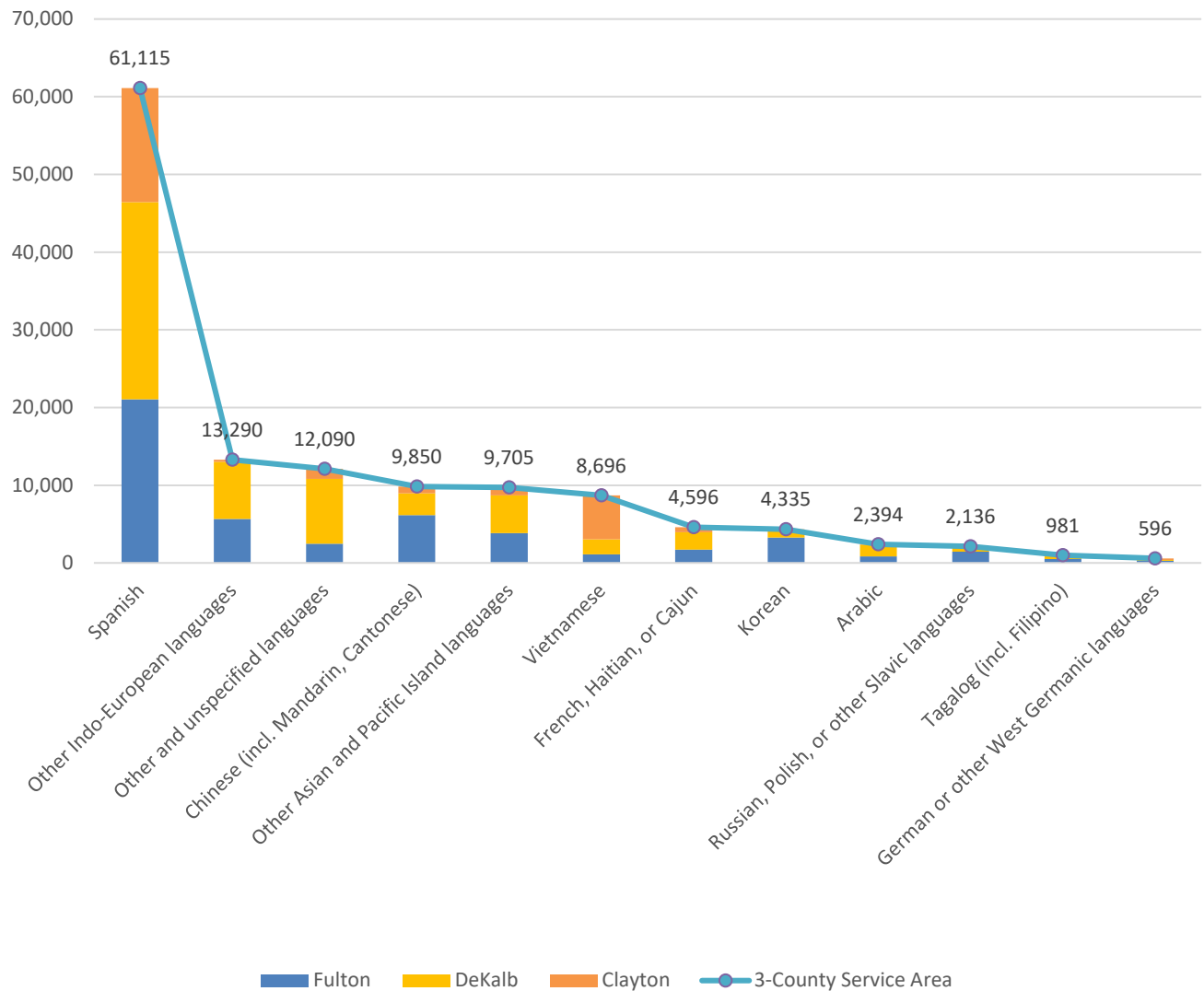
Germanic languages:						
Speak English "very well"	3,940	±935	1,984	±530	221	±152
Speak English less than "very well"	289	±158	113	±77	194	±242
Russian, Polish, or other Slavic languages:	5,766	±1,664	2,509	±476	5	±11
Speak English "very well"	4,298	±1,165	1,841	±438	5	±11
Speak English less than "very well"	1,468	±611	668	±210	0	±34
Other Indo-European languages:	28,430	±2,404	17,593	±1,920	806	±373
Speak English "very well"	22,770	±1,794	10,221	±1,264	548	±295
Speak English less than "very well"	5,660	±1,194	7,372	±1,369	258	±178
Korean:	7,138	±1,081	2,378	±419	244	±151
Speak English "very well"	3,884	±682	1,399	±293	142	±104
Speak English less than "very well"	3,254	±645	979	±276	102	±81
Chinese (incl. Mandarin, Cantonese):	13,767	±1,473	6,870	±970	1,030	±554
Speak English "very well"	7,602	±966	4,086	±612	129	±99
Speak English less than "very well"	6,165	±946	2,784	±590	901	±554
Vietnamese:	2,170	±767	3,476	±693	8,456	±920
Speak English "very well"	1,054	±348	1,550	±409	2,802	±502
Speak English less than "very well"	1,116	±501	1,926	±494	5,654	±740

Tagalog (incl. Filipino):	1,831	±507	863	±336	547	±358
Speak English "very well"	1,331	±437	481	±208	448	±340
Speak English less than "very well"	500	±204	382	±247	99	±93
Other Asian and Pacific Island languages:	18,069	±1,607	11,038	±1,464	2,279	±571
Speak English "very well"	14,212	±1,264	6,218	±779	1,251	±332
Speak English less than "very well"	3,857	±851	4,820	±1,138	1,028	±326
Arabic:	3,848	±1,137	3,527	±802	306	±299
Speak English "very well"	3,015	±847	2,016	±545	256	±240
Speak English less than "very well"	833	±411	1,511	±529	50	±74
Other and unspecified languages:	12,154	±1,803	27,265	±3,407	4,679	±1,131
Speak English "very well"	9,672	±1,512	18,912	±2,887	3,424	±935
Speak English less than "very well"	2,482	±775	8,353	±1,263	1,255	±447

**Table 2: Prevalence of languages spoken at home by the LEP population (ACS 2018-2022 – Table C16001)
by county and for the 3-county service area combined**

	FULTON COUNTY		DEKALB COUNTY		CLAYTON COUNTY		3-County MARTA Service Area	
	Population Estimate	%	Population Estimate	%	Population Estimate	%	Population Estimate	%
Total Population:	1,003,989		710,886		275,123		1,989,998	
Speak only English	838,282	83.50%	573,244	80.64%	221,681	80.58%	1,633,207	82.07%
Spanish	21,071	2.10%	25,382	3.57%	14,662	5.33%	61,115	3.07%
French, Haitian, or Cajun	1,712	0.17%	2,243	0.32%	641	0.23%	4,596	0.23%
German or other West Germanic languages	289	0.03%	113	0.02%	194	0.07%	596	0.03%
Russian, Polish, or other Slavic languages	1,468	0.15%	668	0.09%	0	0.00%	2,136	0.11%
Other Indo-European languages	5,660	0.56%	7,372	1.04%	258	0.09%	13,290	0.67%
Korean	3,254	0.32%	979	0.14%	102	0.04%	4,335	0.22%
Chinese (incl. Mandarin, Cantonese)	6,165	0.61%	2,784	0.39%	901	0.33%	9,850	0.49%
Vietnamese	1,116	0.11%	1,926	0.27%	5,654	2.06%	8,696	0.44%
Tagalog (incl. Filipino)	500	0.05%	382	0.05%	99	0.04%	981	0.05%
Other Asian and Pacific Island languages	3,857	0.38%	4,820	0.68%	1,028	0.37%	9,705	0.49%
Arabic	833	0.08%	1,511	0.21%	50	0.02%	2,394	0.12%
Other and unspecified languages	2,482	0.25%	8,353	1.18%	1,255	0.46%	12,090	0.61%

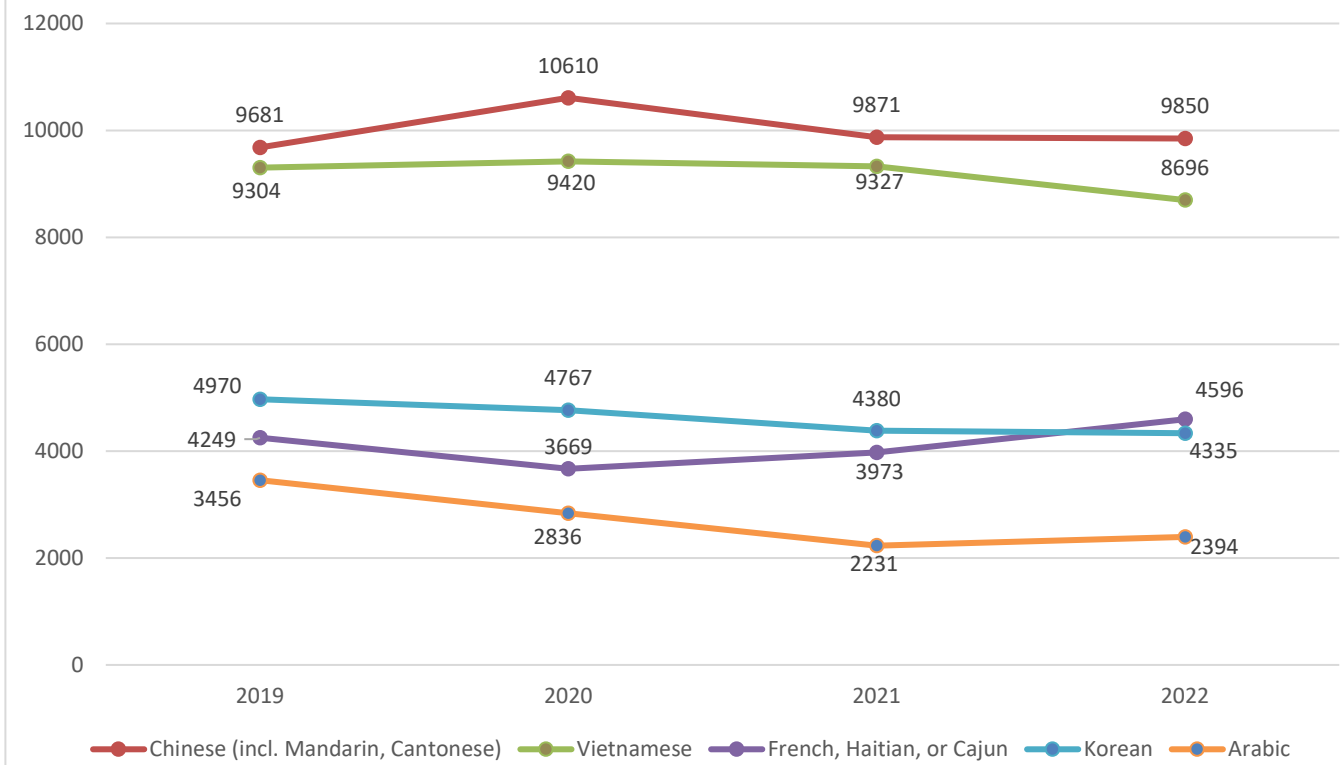
Chart 1: Languages Spoken at Home by the LEP Population



Data Source:

ACS 2018 – 2022
5-Year Estimates
Table C16001

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



Data Analysis

Table 2 details the estimated LEP population for each county. The Spanish-language is the most commonly spoken language at home in all three counties (21,071 persons in Fulton County; 25,382 persons in DeKalb County; 14,662 persons in Clayton County). Other than the Spanish-language, the **second and third most commonly spoken languages** at home differ by county:

Fulton County: 6,165 Chinese speakers; 3,254 Korean speakers

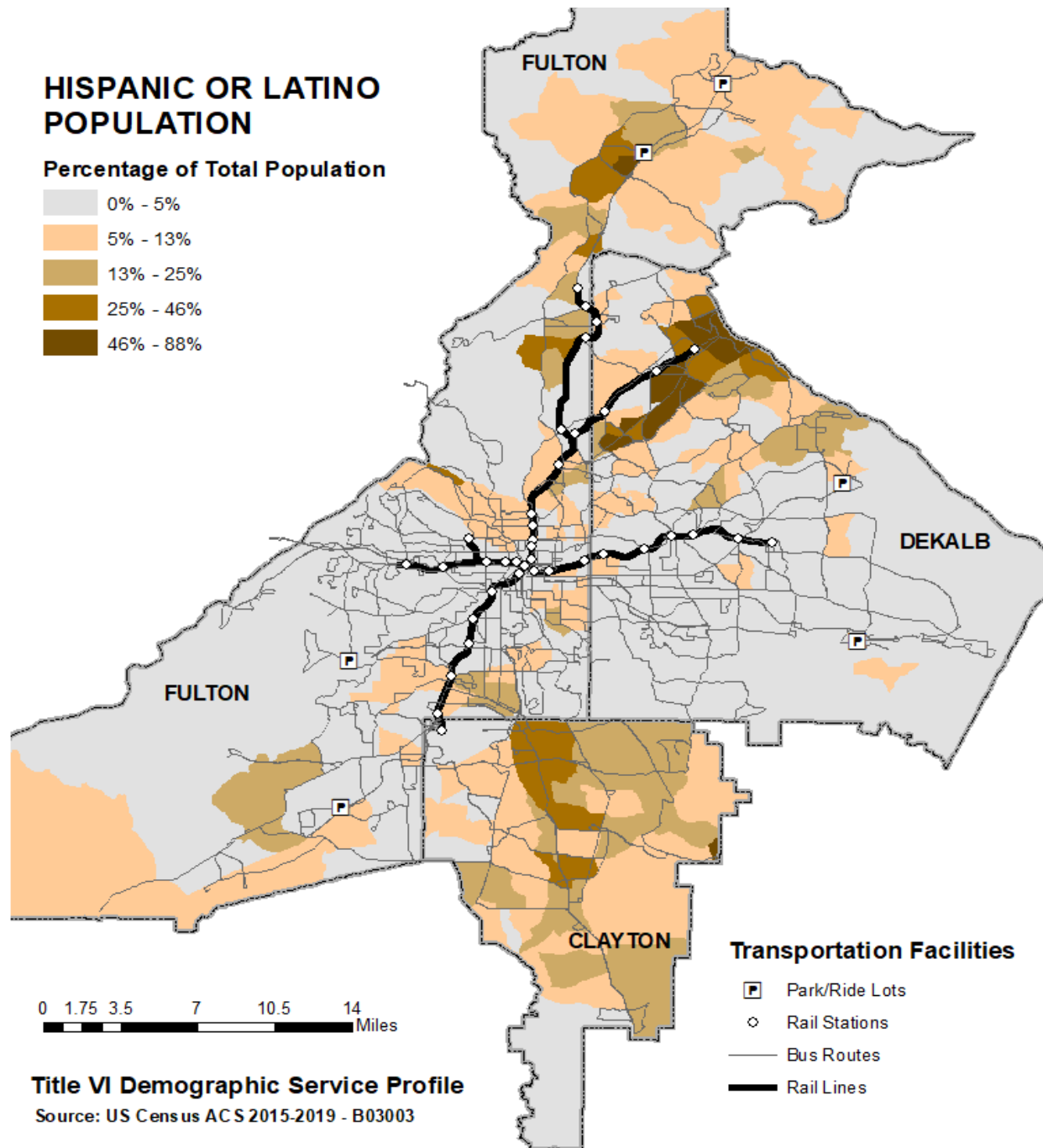
Dekalb County: 2,784 Chinese speakers; 2,243 French, Haitian, Cajun speakers

Clayton County: 5,654 Vietnamese speakers; 901 Chinese speakers

Charts 1 and 2 provide graphical comparison of languages spoken at home by the LEP population in the MARTA service area (Fulton, DeKalb and Clayton counties combined). Chart 1 ranks languages from left to right in order of greatest to lowest number of speakers. Individually classified languages in the order of greatest to lowest number of speakers are Spanish (61,115 persons), Chinese, including Mandarin and Cantonese (9,850 persons), Vietnamese (8,696 persons), French, Haitian, or Cajun (4,596 persons), and Korean (4,335 persons). The aggregated language classifications ‘Other Indo-European languages’, ‘Other and unspecified languages’, and ‘Other Asian and Pacific Island languages’ are ranked somewhat highly but are comprised of a diverse range of distinct languages that are not sufficiently common to be classified individually.

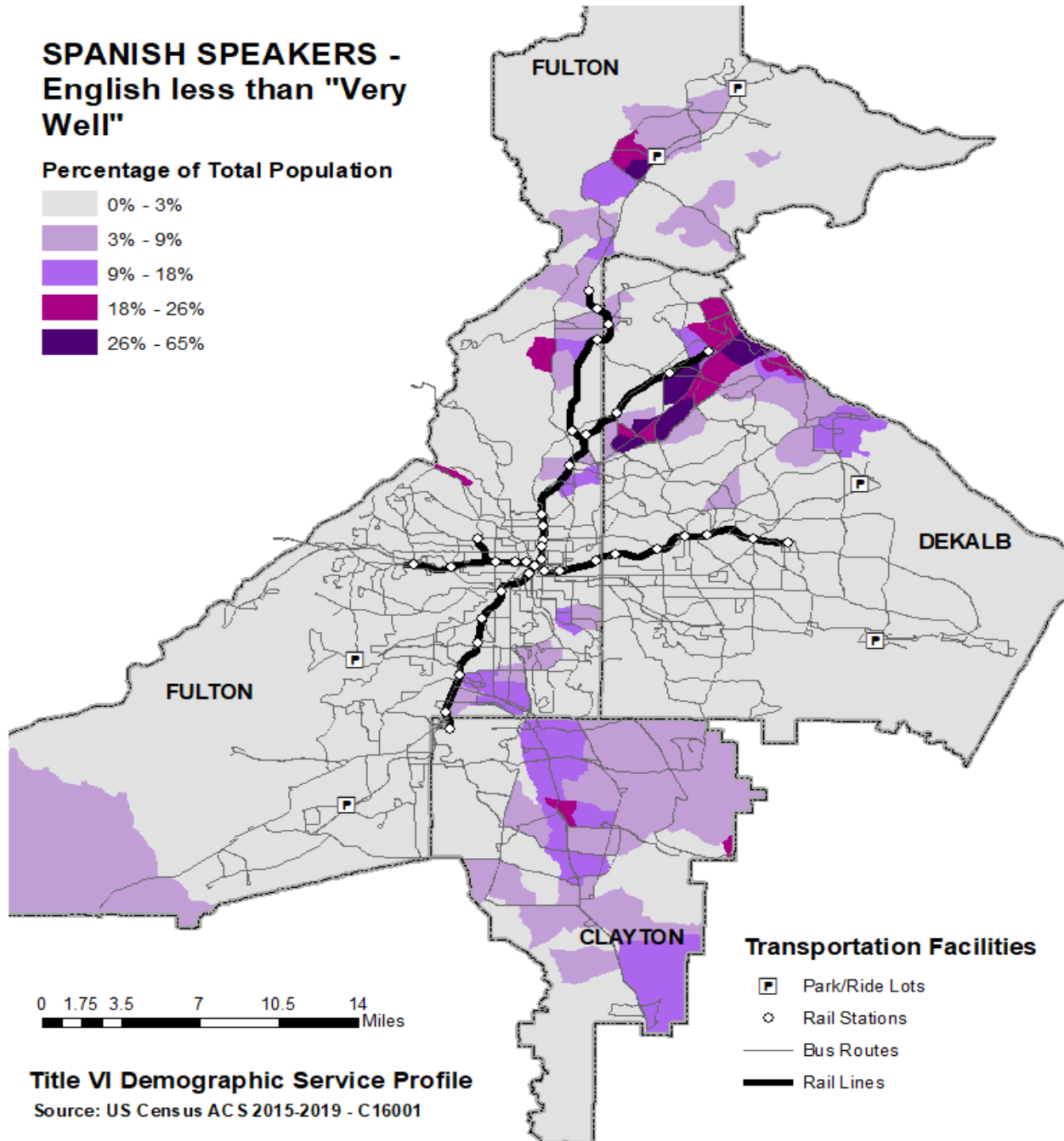
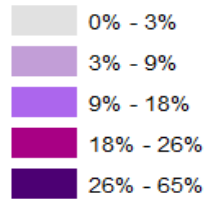
Chart 2 illustrates the trend of LEP population growth over time. Comparison of LEP population from 2019 shows trend of decline among Arabic speakers and an increase in French, Haitian, Cajun speakers.

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



SPANISH SPEAKERS - English less than "Very Well"

Percentage of Total Population



Title VI Demographic Service Profile

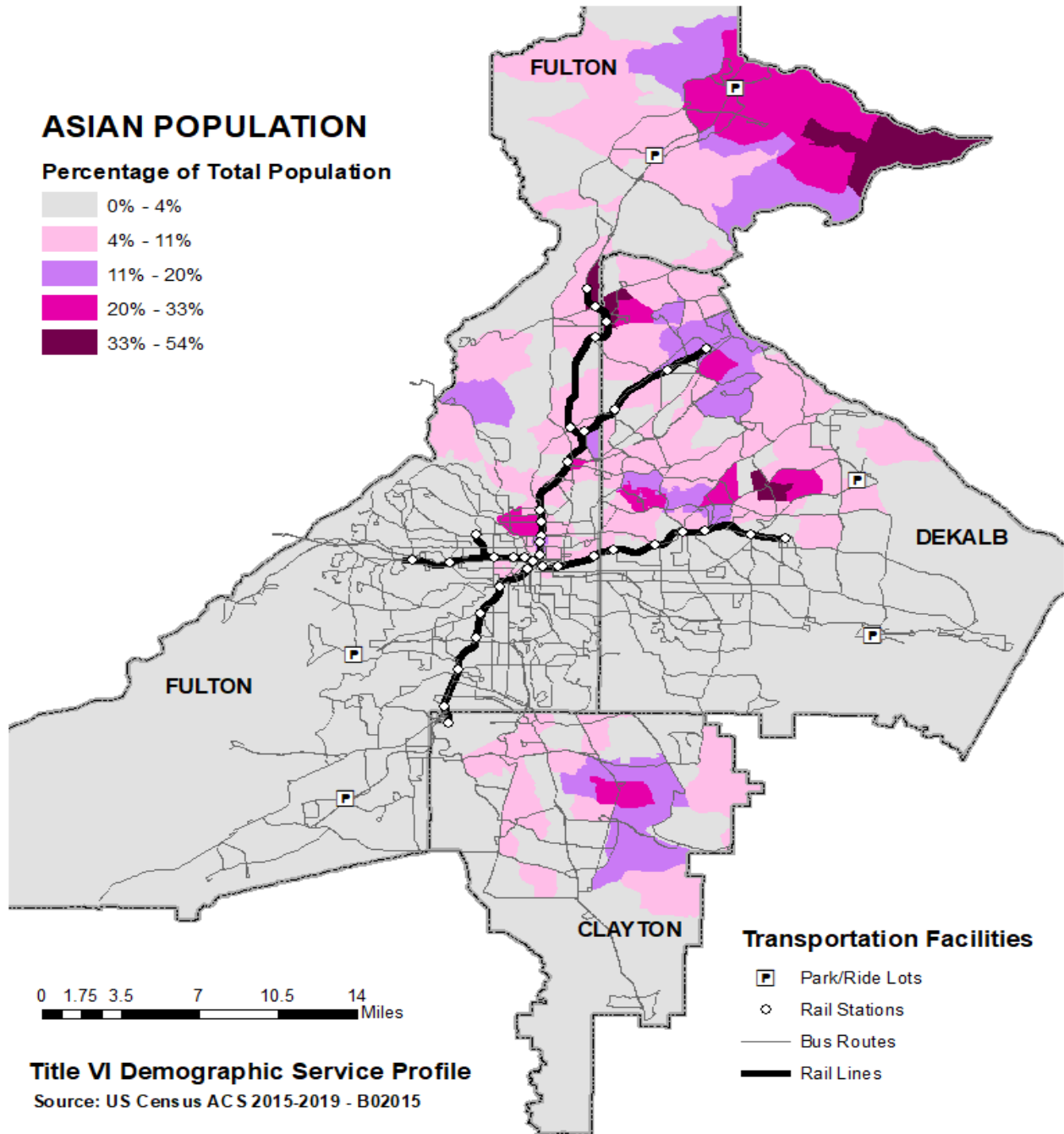
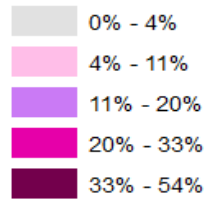
Source: US Census ACS 2015-2019 - C16001

Transportation Facilities

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

ASIAN POPULATION

Percentage of Total Population

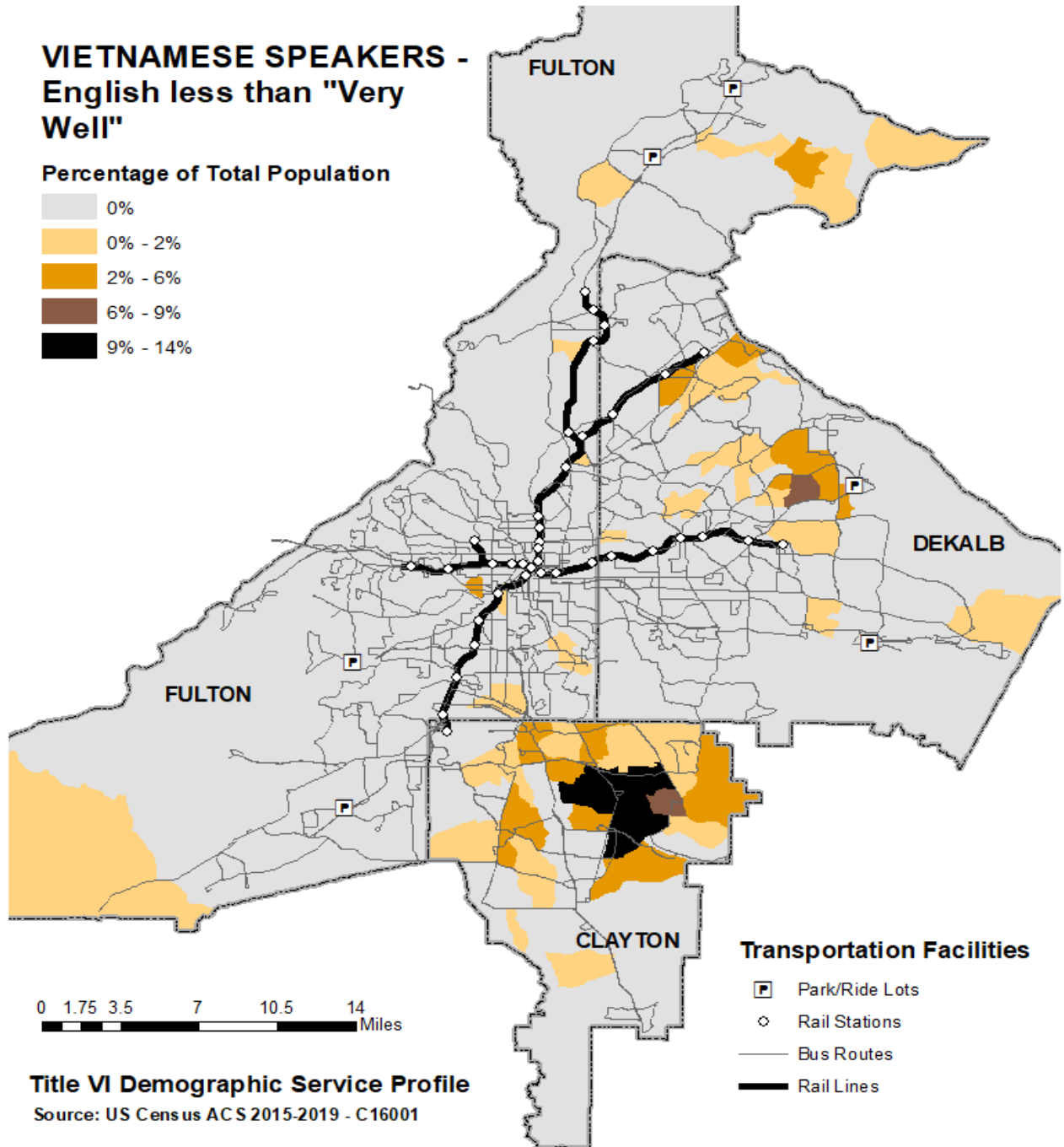


Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - B02015

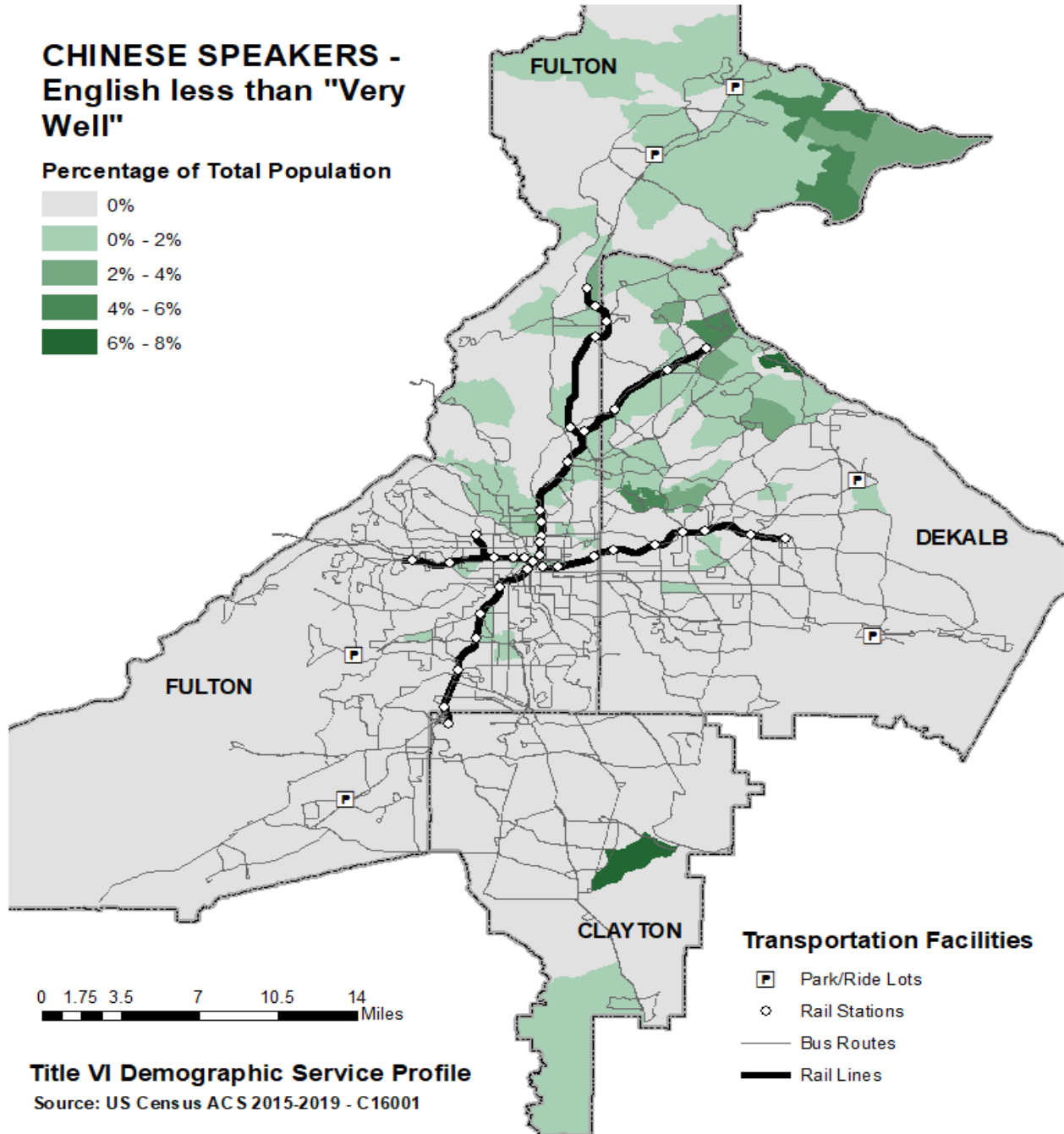
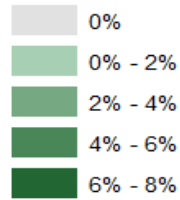
Transportation Facilities

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



CHINESE SPEAKERS - English less than "Very Well"

Percentage of Total Population



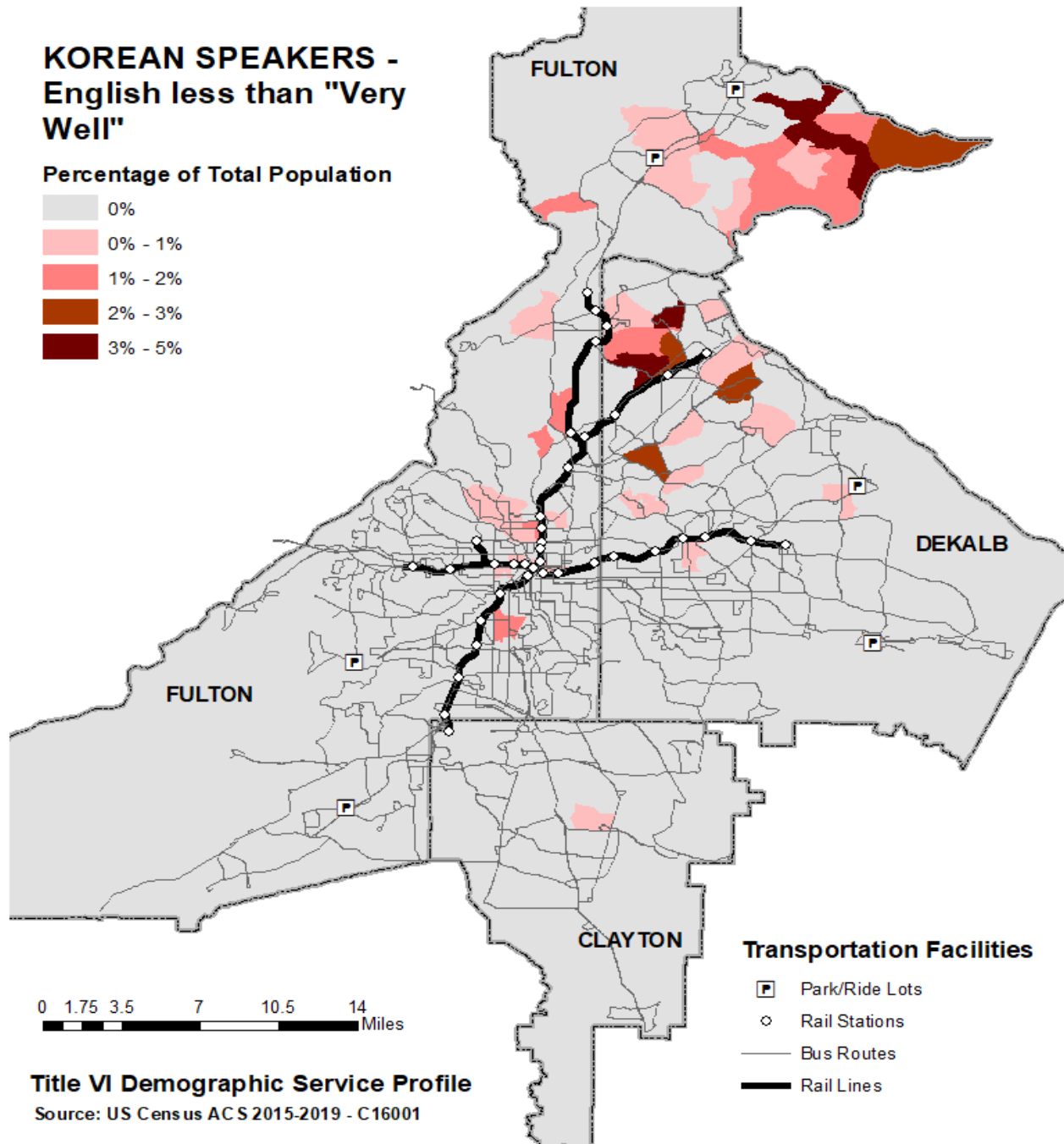
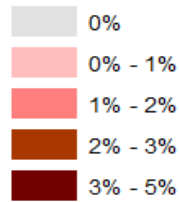
Title VI Demographic Service Profile
Source: US Census ACS 2015-2019 - C16001

Transportation Facilities

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

KOREAN SPEAKERS - English less than "Very Well"

Percentage of Total Population



0 1.75 3.5 7 10.5 14 Miles

Title VI Demographic Service Profile

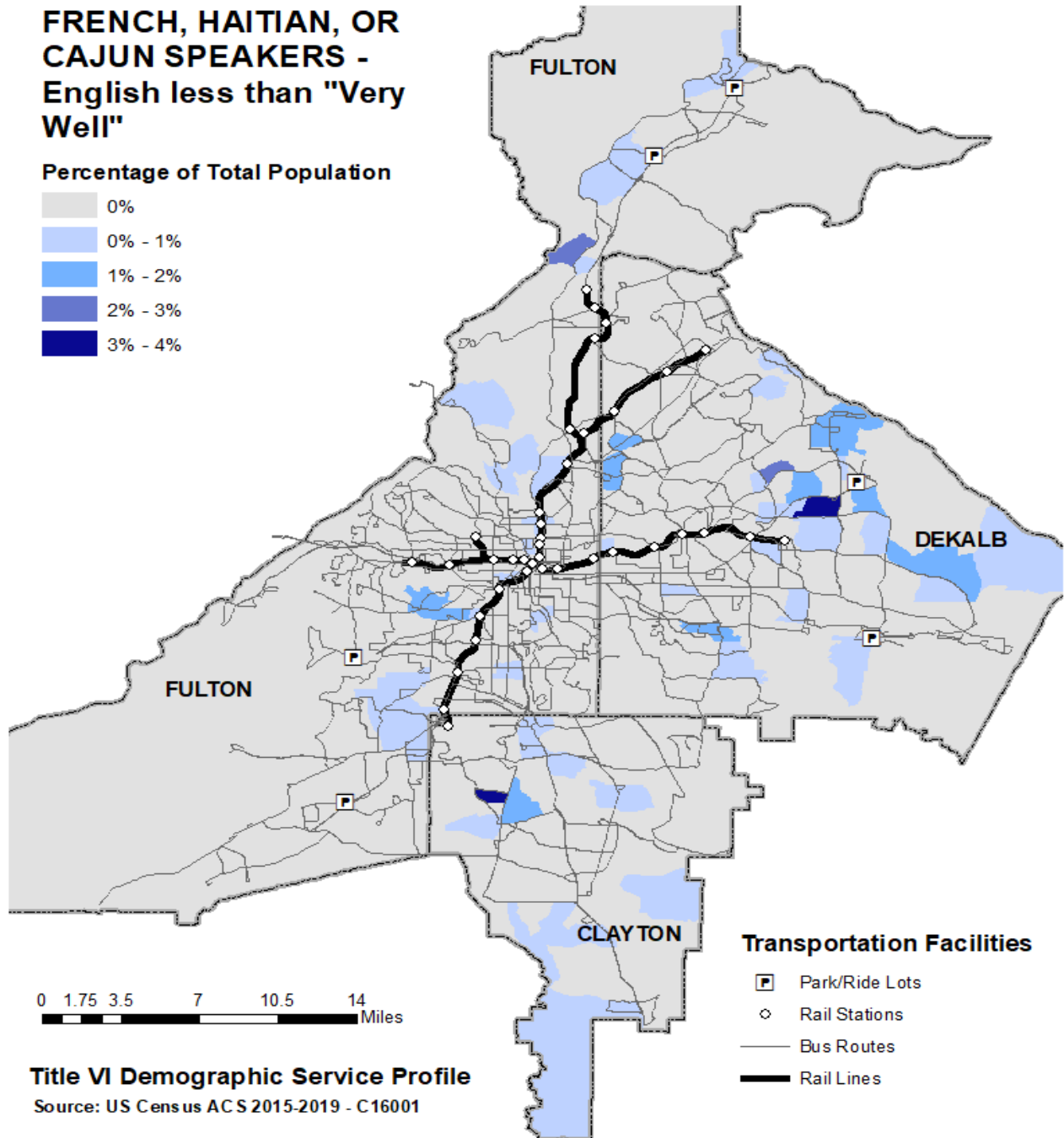
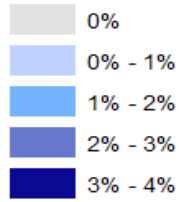
Source: US Census ACS 2015-2019 - C16001

Transportation Facilities

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

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

Percentage of Total Population



0 1.75 3.5 7 10.5 14 Miles

Title VI Demographic Service Profile

Source: US Census ACS 2015-2019 - C16001

Transportation Facilities

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

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

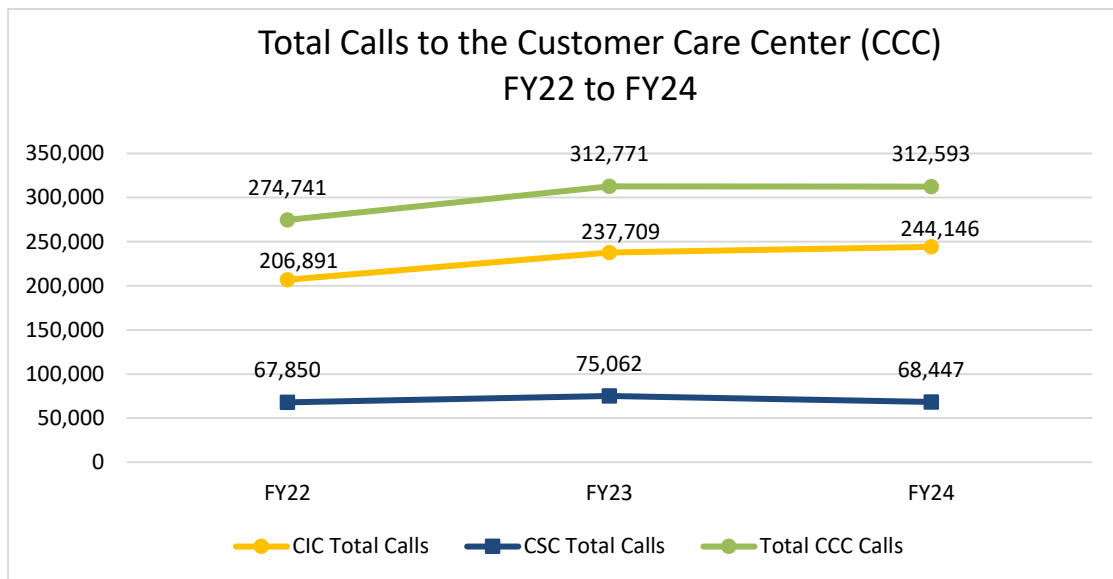
MARTA has considered the frequency of contact that patrons who speak different languages may have with MARTA services. In order to establish the frequency of contact by LEP persons, MARTA utilized a combination of the following resources:

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

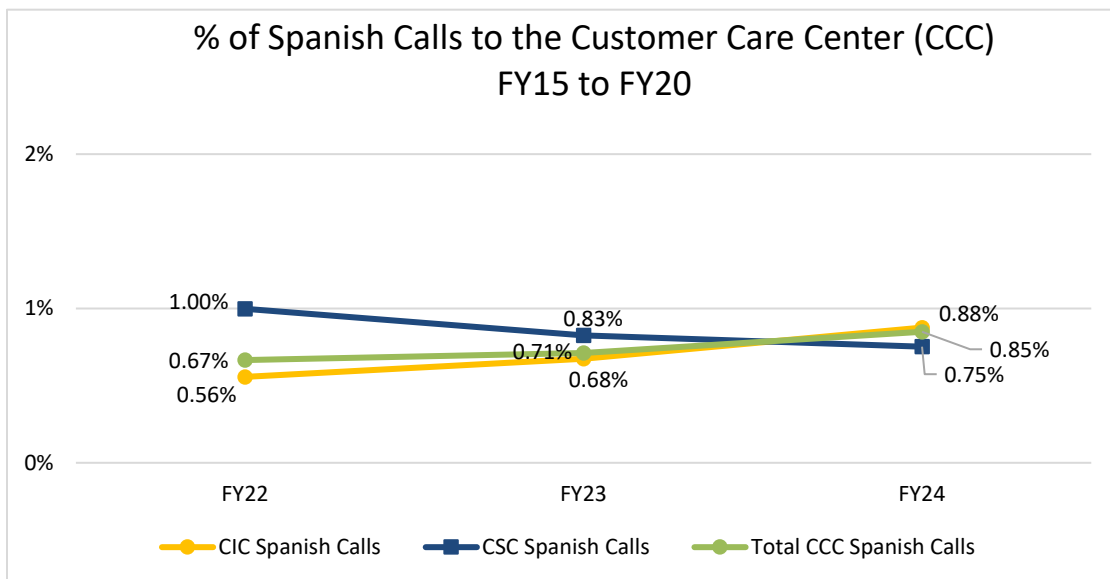
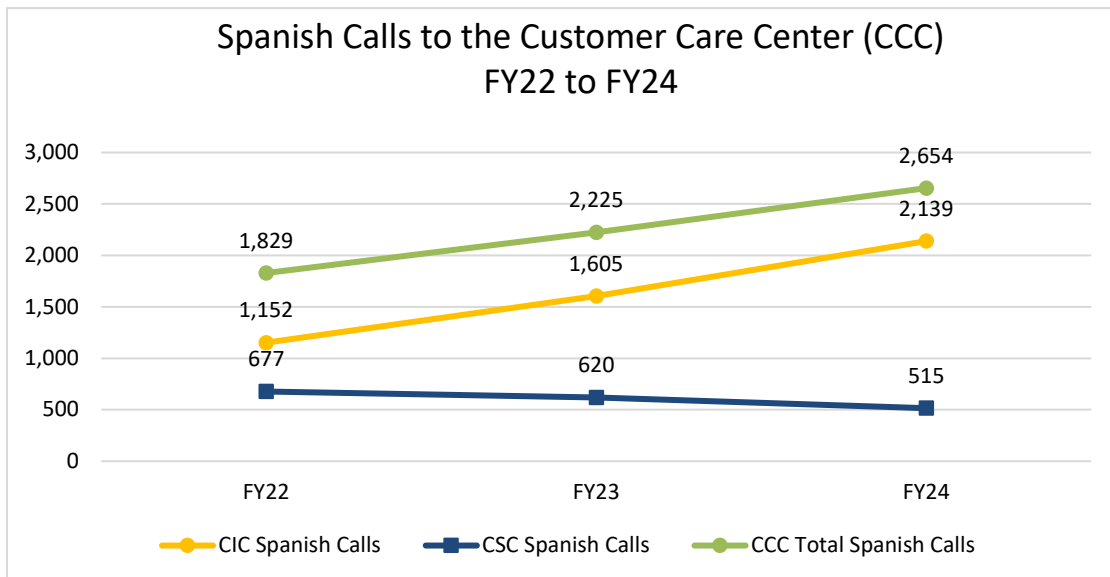
For MARTA programs, where public outreach or involvement is central to the mission, staff has and will continue to consider the appropriate outreach to LEP persons and how additional resources could increase the frequency of contact with those groups, triggering a higher level of language assistance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

Customer Service Center Data

The Customer Care Center is comprised of two call centers, the Customer Service Center and Customer Information Center. The Customer Information Center (CIC) assists patrons with bus and rail schedules and trip itineraries while the Customer Service Center (CSC) handles customer complaints and concerns. Most total calls to the Customer Care Center are for Customer Information (CIC), and the number of CIC calls has been increasing since FY22.



During FY2024, the Customer Care Center received 2,654 calls in which callers requested the Spanish automated phone system, a 45% increase compared to FY22. Callers selecting the Spanish menu option were routed to bilingual Customer Care Center representatives if they were available. During fiscal years FY22 through FY24, up to 1% of calls to the Customer Care Center requested Spanish.



Language Line Translation Services Usage

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

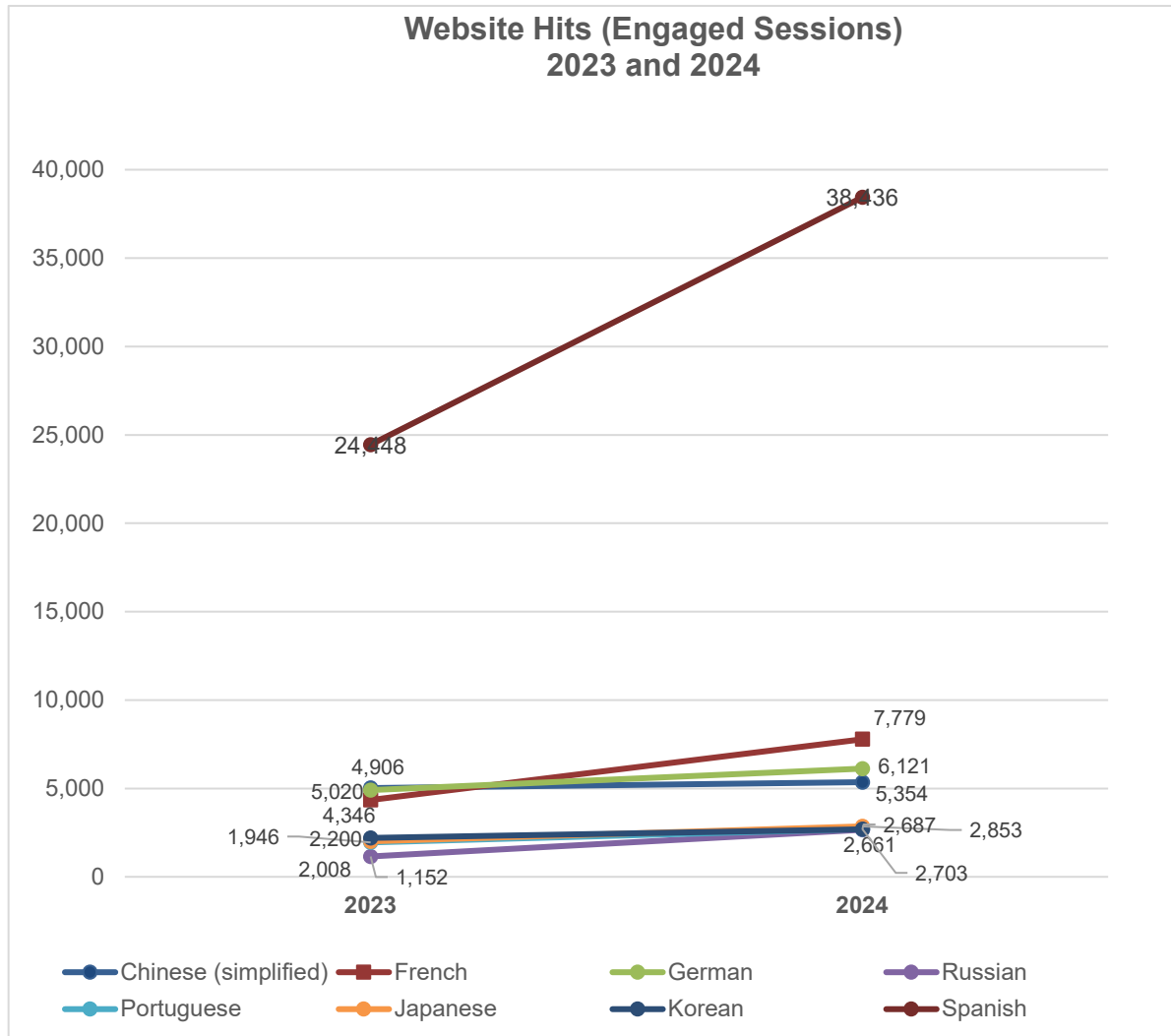
Assessment of the Language Line Use

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.

Language	Calls	Minutes	Charges	Avg. Connect Time	Avg. Minutes	% of Total
SPANISH	1765	18754	15940.90	11.81	10.6	97.3
FRENCH	16	141	139.59	38.69	8.8	0.88
RUSSIAN	7	54	53.46	68.00	7.7	0.39
MANDARIN	6	58	57.42	84.17	9.7	0.33
SOMALI	4	77	76.23	3.00	19.3	0.22
ARABIC	3	55	54.45	12.33	18.3	0.17
PORTUGUESE	3	34	33.66	3.67	11.3	0.17
SWAHILI	2	25	24.75	3.50	12.5	0.11
HAITIAN CREOLE	2	20	19.80	30.50	10	0.11
VIETNAMESE	2	25	24.75	3.00	12.5	0.11
GUJARATI	1	4	3.96	2.00	4	0.06
BOSNIAN	1	6	5.94	0.00	6	0.06
HINDI	1	25	24.75	12.00	25	0.06
KOREAN	1	16	15.84	12.00	16	0.06

Website Hits by Language

The MARTA website, itsmarta.com, has a Google translate widget that allows visitors to translate the site into 8 languages other than English: Spanish, Chinese (simplified), French, German, Russian, Portuguese, Japanese, and Korean. The graph below shows website hits by language for 2023 and 2024.



Voice of the Customer Survey Data

The Voice of the Customer (VOC) Survey is a comprehensive study that tracks customer satisfaction and perceptions for MARTA's rail and fixed-route bus service. The VOC is also used to monitor demographics and usage behavior of MARTA patrons.

The FY2024 Voice of the Customer survey database was used to compile information on demographic attributes of MARTA's riders for LEP. The report presents statistics from 1,021 surveys that R&A Data Collection Specialists distributed on board MARTA's rail and fixed route bus systems.¹

FY24 Voice of the Customer Survey: Primary Language Spoken at Home

More than nine out of ten respondents of the FY24 VOC Survey reported that English was the primary language spoken at home (89.4%). The second most common language was Spanish (6.7%).

Language	Contact %
English	89.4%
Spanish	6.7%
Chinese	0.5%
Vietnamese	0.1%
Other	3.3%
Total	100.0%

¹ The Voice of the Customer Survey has undergone a significant overhaul and data collection was conducted during only one quarter of FY24, resulting in a smaller sample size than usual.

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

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

Factor 4: The Resources Available and the Costs

Resources

Oral Interpretation Services

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

Written Translation Services

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

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

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

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

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

Cost of Translations 2022 - 2024

Translation Source	Event	Date	Cost
API) Formerly AALS (Chinese, Korean, Vietnamese)	May Budget Hearing	04/29/22	\$1,860.76
True Language (Spanish)	Marta Reach 4.5x6.25 flyer	01/21/22	\$212.50
	Track Replacement 2022 - A Stations	01/26/22	\$250.00
	Track Replacement 2022 - A Stations	01/28/22	\$250.00
	Reach workshop in Spanish & Vietnamese and Reach townhall flyer in Spanish only	02/03/22	\$387.50
	Track Replacement 2022 - C Stations	02/03/22	\$212.50
	Track Replacement 2022 - E Stations	02/10/22	\$212.50
	Track Replacement 2022 - D Stations	02/11/22	\$212.50
	Reach Poster	02/17/22	\$212.50
	Reach Fact Sheet French Translations	03/07/22	\$229.32
	See & Say 2.0 App	04/25/22	\$306.25
	See & Say 2.0 App	05/24/22	\$280.37
	See & Say 2.0 App	06/28/22	\$231.81
	National Voter Registration Day	08/26/22	\$232.50
	September Service Change Notice	09/02/22	\$578.24
Mundo Hispanico (Spanish) Cost of translation included in cost to run.	Track Replacement 2022	2/3, 2/9, 2/16/22	\$2,800.00
		Total	\$8,469.25

2023			
API)Formerly AALS (Chinese, Korean, Vietnamese)	May Budget Hearing Ad	05/02/23	\$2,009.04
True Language (Spanish)	Track Replacement 2023 - Package A	01/19/23	\$357.50
	Track Replacement 2023 - B & C Stations, D & E Banners, Buckhead Station	01/19/23	\$740.75
	Track Replacement 2023 -Medical Center & Lenox Stations banners	01/24/23	\$220.00
	Parking Lot Repaving Fact Sheet	02/21/23	\$327.37
	April Service Change Notice	04/03/23	\$287.99
	Breeze Mobile 2.0 bus shelter hanger	04/12/23	\$232.50
	Breeze Mobile 2.0 rail card	04/14/23	\$232.50
	MARTA Mobility FAQ Key Contacts, Reduced Fare Brochure & Travel Training Initiative Flyer	04/19/23	\$416.19
	Breeze Mobile 2.0 ad	04/24/23	\$272.50
	Indian Creek Rehab flyer	04/20/23	\$306.31
	H.E. Holmes TOD flyer	05/26/23	\$232.50
	MARTA K-12 Parent Information flyer	07/11/23	\$150.00
Mundo Hispanico (Spanish)			
Cost of translation included in cost to run.	May Budget Hearing Ad	05/16, 05/18/23	\$1,400.00

	Breeze Mobile 2.0	4/20, 4/27, 5/11, 5/25/23	\$5,300.00
		Total	\$12,485.15
2024			
True Language (Spanish)	Riders Advisory Council (RAC) Application	02/05/24	\$206.48
TransPerfect	Service Change Notice	08/07/24	\$117.56
Mundo	Public Hearing Notice	01/25/24	\$100.00
	Airport Station Closure	03/7, 3/14, 3/21, 3/28/24	\$100.00
	May Budget Hearing	04/15/24	\$100.00
	Five Points Transformation	08/28/24	\$100.00
	Public Hearing Notice	8/29, 9/25/24	\$100.00
API) Formerly AALS (Chinese, Korean, Vietnamese)	February Public Hearing Notice	02/05/24	\$721.56
	Service Change Notice	03/22/24	\$182.79
	May Budget Hearing	05/07/24	\$1,784.00
	Sept. Public Hearing Notice	08/07/24	\$438.75
		Total	\$3,951.14

MARTA Outreach Activities and Public Hearings 2022 – 2024

Year-Date	Public Hearing/Engagement Activities	Locations/ Method
Friday, February 4, 2022	Transit Equity Day	West End Station
Friday, February 18, 2022	Senior Voter Registration	East Point Station
Monday, February 28, 2022	MARTA Reach Launch event	Harrison Square GA Tech
Tuesday, March 22, 2022	MARTA Reach Pop-up event	East Lake Station
Wednesday, March 23, 2022	MARTA Reach Pop-up event	HE Holmes Station
Saturday, March 26, 2022	Campbellton Bus Tour	Oakland City Station/Greenbriar Mall
Tuesday, March 29, 2022	DeKalb County Voter Registration Listening Session	Virtual
Tuesday, April 19, 2022	Upper Westside CID Community Event	Midtown Collective
Saturday, May 21, 2022	Campbellton Open House	Junction 2800, SW Atlanta
Tuesday, May 24, 2022	Older Americans Month Event	Benson Senior Multipurpose Center
Wednesday, May 25, 2022	Cheshire Bridge High Rise Senior Event	Cheshire Bridge High Rise
Saturday, June 18, 2022	Juneteenth Event	Centennial Park
Wednesday, June 22, 2022	Launch – Ribbon Cutting – Kensington Station Soccer	Kensington Station
Tuesday, September 20, 2022	MARTA National Voter Registration Day event	College Park, HE Holmes, Five Points, Kensington, Doraville, North Springs, Lindbergh
Thursday, September 22, 2022	Westside Works Relaunch Event	Westside Works

Saturday, September 24, 2022	Lindbergh Station Soccer Grand Opening event	Lindbergh Station
Saturday, October 8, 2022	DeKalb Community Empowerment Fall Festival	South Dekalb Mall Galleria
Tuesday, October 11, 2022	College Park Housing PCC/FSS – Partnership	Virtual
Thursday, October 13, 2022	South Fulton Human Services Coalition Meeting	Virtual
Friday, October 21, 2022	Senior Summit Lunch and Learn	Harriet Darnell Multipurpose Senior Center
Saturday, October 22, 2022	Clayton County Fall Festival	Flat Shoals Park
Wednesday, October 26, 2022	College Park Senior Fall Festival	College Park Public Safety Bldg.
Saturday, November 5, 2022	Oakland City TOD Workshop/Pop-up	Oakland City Station
Tuesday, November 15, 2022	College Park Housing Agency Appreciation event	The Network ATL (Right Hand Foundation)
Thursday, November 17, 2022	Thanksgiving Event (Lil' Baby/Goodr/UPS/Hawks)	West End Station
Thursday, December 15, 2022	College Park Housing Authority Senior Event	Lindsay Building, College Park
Wednesday, December 21, 2022	Armour Yard Tour	Armour Yard Facility
Saturday, February 18, 2023	Clifton Transit Open House	North Decatur Presbyterian Church
Saturday, February 25, 2023	Live Well Day	Atlanta Food Bank
Tuesday, March 7, 2023	ARC Community Connect Senior Program	Peachtree Road Senior Highrise
Wednesday, March 8, 2023	ARC Community Connect Senior Program	Cheshire Bridge Highrise
Thursday, March 9, 2023	ARC Community Connect Senior Program	Marietta Road Highrise

Tuesday, March 14, 2023	ARC Community Connect Senior Program	East Lake Highrise
Wednesday, March 15, 2023	ARC Community Connect Senior Program	Georgia Ave Highrise
Thursday, March 16, 2023	ARC Community Connect Senior Program	Cosby Spear Highrise
Saturday, March 25, 2023	GOODR Clayton Event	Tara Stadium
Monday, April 24, 2023	Autism Awareness Month event	Kirkwood Library
Saturday, April 29, 2023	Dekalb Youth and Family Summit	Redan Rec Center
Sunday, April 30, 2023	Roswell Moves Event	Canton Street, Roswell
Thursday, May 11, 2023	MARTA/Goodr Event w/ Commissioner Hambrick/ Reduced Fare Pop-up	Frank Bailey Senior Center
Saturday, May 20, 2023	MARTA x Goodr Event w/ Commissioner Anderson/ Reduced Fare Pop-up	Sonna Singleton Senior Center
Saturday, June 10, 2023	Lakewood Community Block Party Event	Rosel Fann Rec Center
Saturday, July 15, 2023	MARTA Day at the Science Gallery's JUSTICE exhibit	Pullman Yards
Saturday, July 22, 2023	APS Back to School Bash	GWCC
Friday, August 18, 2023	Trinity Towers High Rise-Reduced Fare Pop-up	Trinity Towers Senior Highrise
Wednesday, August 30, 2023	Empowering Women @ MARTA – Building a Strong Support Network	Virtual
Wednesday, September 6, 2023	Goodr Mobile Market/Reduced Fare Pop-up	Flint River Community Center
Friday, September 8, 2023	Clairmont Oaks Senior High-rise Lunch & Learn	Clairmont Oaks Senior Highrise

Tuesday, September 19, 2023	MARTA National Voter Registration Day Event	Five Points, College Park, HE Holmes, Doraville, Lindbergh, North Springs, Kensington stations
Sunday, September 24, 2023	Atlanta Streets Alive	Five Points, Peachtree and Civic Center stations
Wednesday, October 4, 2023	J H. Huie Elementary School – Reading & Career Day	John H. Huie Elementary School
Monday, October 9, 2023	Briarcliff Oaks Senior High-rise Health Fair	Briarcliff Oaks Senior High-rise
Friday, October 13, 2023	Reduced Fare Pop-up – Clairmont Oaks Senior Highrise	Clairmont Oaks Senior Highrise
Saturday, October 21, 2023	West End Lee St. Bike Lanes (Safe/Lee PARTY)	West End Station
Sunday, October 22, 2023	Atlanta Streets Alive	Civic Center Station
Friday, October 27, 2023	East Lake Station Soccer Launch Event	East Lake Station
Saturday, November 11, 2023	GPB's Be My Neighbor Day event	Home Depot Backyard
Sunday, November 12, 2023	Atlanta Streets Alive	Civic Center Station
Tuesday, November 14, 2023	GoodR/MARTA event/ Reduced Fare Pop-up	Flint River Community Center
Friday, November 17, 2023	GoodR/MARTA event	Frank Bailey Senior Center
Sunday, December 3, 2023	Atlanta Streets Alive	Five Points & Civic Center Stations
Monday, December 4, 2023	GoodR/MARTA event/ Reduced Fare Pop-up	Clayton County Main Library
Monday, January 15, 2024	95th Birthday of Rev. Dr. Martin Luther King, Jr., and the Anniversary of the National King Holiday event	MLK Birth home
Wednesday, February 28, 2024	Clayton County Northwest Library Outreach	Clayton Northwest Library

Thursday, February 29, 2024	Black History Month Customer Appreciation Station event	College Park Station
Thursday, March 7, 2024	Reduced Fare Pop-up	Piney Grove Baptist Church Community Center
Wednesday, March 13, 2024	AHA- MARTA Senior Services Lunch & Learn	Cheshire Bridge Road Highrise
Monday, March 18, 2024	City of Atlanta Public Engagement Day	City of Atlanta City Hall
Tuesday, March 19, 2024	AHA – MARTA Senior Services Lunch & Learn	Peachtree Road Senior Highrise
Friday, March 22, 2024	Career Day – Kemp Elementary	Kemp Elementary
Tuesday, March 26, 2024	AHA – MARTA Senior Services Lunch & Learn	Cosby Spears Senior Highrise
Thursday, March 28, 2024	Barack Obama Elem Career Day	Barack Obama Elementary
Wednesday, March 20, 2024	Commissioner Hambrick’s Community Eggstravaganza Event	Clayton County
Saturday, April 20, 2024	Global Growers Event	Indian Creek Station
Thursday, April 25, 2024	Reduced Fare Pop-up	Rosel Fann Rec Center
Wednesday, May 1, 2024	Atlanta Housing/ MARTA Mobility – Listening Session	Cosby Spears Senior Highrise
Tuesday, May 7, 2024	Reduced Fare Pop-up – 2024 Senior Summit	Georgia International Convention Center
Sunday, May 19, 2024	Atlanta Streets Alive	Civic Center Station
Sunday, June 16, 2024	Atlanta Streets Alive	Civic Center Station
Saturday, July 13, 2024	Alma’s Way/GPB Event – Arts Center Station	Arts Center Station
Saturday, July 20, 2024	Atlanta Back to School Bash	Georgia World Congress Center
Sunday, July 28, 2024	Atlanta Streets Alive	Civic Center Station

Tuesday, August 13, 2024	MARTA Rapid Campbellton/Greenbriar Hub Public Meeting	Junction 2800 Community Center
Sunday, August 18, 2024	Atlanta Streets Alive	Civic Center Station
Friday, September 6, 2024	Ride Route 191 – Pop-up meeting	Bus- Route 191
Thursday, September 12, 2024	Public Hearing	Riverdale Towne Center
Thursday, September 12, 2024	John Lewis Bus Wrap Reveal Event	College Park Station
Thursday, September 26, 2024	Hispanic Heritage Customer Appreciation Event	Chamblee Station
Sunday, October 6, 2024	Westside Stride Event	Howell Mill Rd @ Edgemoor
Thursday, October 10, 2024	Pride Bus Wrap Reveal & Customer Appreciation Event	North Ave. Station
Wednesday, October 16, 2024	Rapid Campbellton Pop-up	Oakland City Station
Sunday, October 20, 2024	Atlanta Streets Alive	Georgia Ave.
Tuesday, October 29, 2024	S. DeKalb Public Meeting	DeKalb Senior Center
Wednesday, November 13, 2024	Soccer in the Streets 35th Anniv. Event	Historic DeKalb Courthouse – 101 E Court Sq, Decatur, GA 30030 ·
Sunday, November 17, 2024	Atlanta in the Streets	Georgia Ave.
Thursday, November 21, 2024	MARTA Holiday Bus Reveal & Market	West End Station
Thursday, December 12, 2024	Bus Network Redesign Public Meeting	Virtual
Tuesday, December 17, 2024	Bus Network Redesign Public Meeting	Virtual

Office of Diversity and Inclusion – LEP related outreach efforts 2022 – 2024

D&I also conducted cultural celebrations

- D&I utilized various social media and email to send cultural announcements and information.
- National Hispanic Heritage Month: In celebration, D&I showcased posters identifying Hispanics and their contributions, and highlighted employees, provided food truck, and educational opportunities.
- National Asian and Pacific American Heritage Month: In celebration, D&I showcased posters identifying Asian/Pacific Americans and their contributions, highlighted employees, and provided a cultural food event.
- Black History Month: In celebration, D&I showcased posters identifying Black Americans and their contributions and conducted programs.
- Caribbean American Heritage Month: In celebration, D&I showcased posters identifying Caribbean Americans and their contributions, and highlighted employees.
- Native American Heritage Month: In celebration, D&I showcased posters identifying Indigenous Americans and their contributions.
- Juneteenth: In celebration D&I provided educational information and a celebration event.
- National Inclusion Week: In celebration D&I conducted various events.
- At the suggestion of the GM, The D&I Office organized Inclusion Matters Workshops for Companies that do business with MARTA to encourage DBE participation.

Active community organization memberships include:

- Georgia Hispanic Chamber of Commerce
- Georgia Hispanic Construction Association
- National Assoc of Asian American Professionals (NAAAP) -Atlanta Chapter
- Japan American Society of Georgia
- Disability IN - ATL
- Atlanta Business League
- National Diversity Council (Georgia)
- OUTGeorgia

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

- American Association for Access, Equity and Diversity
- Asian Indian Chamber of Commerce
- Atlanta Tribune
- Women's Transportation Seminar
- Hispanic Chamber of Commerce
- National Association of Black Women in Construction (NABWIC)
- Caribbean American Heritage Month: In celebration, D&I showcased posters identifying Caribbean Americans and their contributions, and highlighted employees.
- Native American Heritage Month: In celebration, D&I showcased posters identifying Indigenous Americans and their contributions.
- At the suggestion of the GM, The D&I Office organized Inclusion Matters Workshops for Companies that do business with MARTA to encourage DBE participation.

Active community organization memberships include:

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

IX. Language Access Plan

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

Providing Notice to the LEP Community Regarding Language Assistance Availability

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

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

Written Translation of Vital Documents

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

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

It is important to make an assessment as to the population percentage and the frequency

and importance of the contact when considering the potential for translating these documents. The departments most likely to encounter the need to translate vital documents are Government Relations, Planning, D&I, Marketing, HR, and Contracts and Procurement.

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

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

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

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

Sometimes very large documents may include both vital and non-vital information. For

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

Oral Language Interpretation Services

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

In addition, MARTA utilizes:

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

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

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

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

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

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

- Be proficient in and have the ability to communicate accurately in both English and in the other language, as well as employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation)
- Have knowledge in both languages of any specialized terms or concepts particular to the program.
- Understand and follow confidentiality and impartiality rules to the same extent as the LEP person for whom they are interpreting or to the extent that their position requires; and
- Understand and adhere to their role as interpreter without deviating into a role as counselor, legal advisor, or another inappropriate role.

Procedure for Accessing Interpreting Services

Language interpretation services are accessed through the following protocols:

- The Customer Information Center is required to have a minimum of one bilingual operator on duty, per shift, to assist with requests from MARTA's Spanish LEP population.
- Telephone communication with LEP Callers: When a non-bilingual employee receives a call and determines that the caller is LEP, the call-taker shall inform the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to the appropriate customer service representative that may assist the caller.
- If no available and appropriate customer service representative is present, the call-taker will contact Language Line. Once a three-way call is established between the call-taker, the LEP caller, and the interpreter, the call-taker will follow the standard operating procedures used for the call center.
- MARTA personnel in the field in need of interpretation services will attempt to identify the LEP individual's primary language using the language identification card. A sample section of this document is found below, and the full document can be located at: <http://www.dol.gov/oasam/programs/crc/ISpeakCards.pdf>.
- Once the language is identified, personnel in the field will contact their supervisor

who will contact Customer Care Center who will either use bilingual Customer Care Representative or call the Language Line for interpretation services.

- MARTA personnel are expected to follow the general procedures outlined in this plan; however difficult circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual MARTA personnel.
- In other than difficult circumstance, MARTA personnel should only use family, friends, or bystanders for interpreting in very informal, non-confrontational contexts and only to obtain basic information at the request of the LEP individual. Using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. Barring difficult circumstance, MARTA personnel should not use minor children to provide interpreter services.

LEP Service Goals

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

- Continue to provide ongoing written notifications in the following languages (Spanish, Chinese, Korean, and Vietnamese) as a standard practice. Monitor French and Haitian
- Add Chinese, Korean, and Vietnamese language options to the MARTA Breeze Card machines as part of the future system upgrades.
- Adopt standard operating procedures (SOPs) to be used by all MARTA front-line employees and contractors when encountering a LEP customer. The SOP may differ depending on the mode of transportation.
- Purchase language translation software to provide translation of written documents more efficiently
- Expand and enhance the written translation services available on MARTA's website to add Vietnamese. Currently, all the major spoken languages are included except for Vietnamese.

- Develop new I-Speak Cards to include phrases and symbols to enhance communication between LEP populations and front-line personnel who encounter LEP populations.
- Continue to distribute MARTA multilingual materials, such as the MARTA Riders Guide, bilingual bus schedules, and “How to Ride MARTA” to community organizations that assist the LEP population.
- MARTA will continue to take reasonable steps to develop in-house language resource bank in the Customer Service Center by hiring personnel with specific language skills.
- MARTA will continue its efforts to recruit and hire bilingual front-line employees by participating in community job fairs and advertising in publications and media that reach diverse populations.
- Conduct at least one Multi-Cultural Focus Group obtain information on the needs of the LEP community
- Consider increased use of pictographs or other symbols throughout the MARTA system to convey messages on how to safely use MARTA.
- Continue to provide frontline staff training and supervisory training on MARTA LEP policies and procedures. Enhance current mandatory training in customer service and diversity awareness to include cultural sensitivity to LEP persons.
- In order to monitor the future translation service needs for LEP populations, MARTA will continue to track expenditures related to providing language assistance in the future.
- Based on the historical usage, changing demographics and projected costs, MARTA will continue to set aside budgetary dollars in order to meet compliance goals and fulfill the provisions of the LEP Plan. Such budgetary dollars shall include resources for: general ongoing translation services, interpreter services, signage, the translation of vital agency documents and other services as needed to ensure full inclusion for LEP populations. The Office of D&I will be provided with an annual fiscal LEP budget and have the primary role in facilitating the distribution of resources for LEP groups.

It is the responsibility of the Office of D&I to ensure that on an ongoing basis, whether new documents, programs, services and activities need to be made accessible for LEP

individuals and provide notice to the LEP public and to employees of any changes in programs or services. In addition, D&I will consider whether changes in demographics, types of services, or other needs require annual re-evaluation of MARTA's Language Assistance Plan. D&I will evaluate MARTA's Language Assistance Plan by seeking feedback from the community and assess potential plan modification based on:

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

X. Staff Roles and Responsibilities

A. Departmental and Executive Management Team Roles and Responsibilities

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

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

The Executive Management Team shall:

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

4. Communicate any systemic-wide concerns in relation to LEP populations to D&I resolution.

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

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

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

This office has the following specific responsibilities:

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

C. Departments with Public Engagement Responsibilities:

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

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

XI. TRAINING STAFF

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

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

The Office of D&I will also disseminate the LEP policies and procedures to all employees likely to have contact with LEP customers. D&I will work with community organizations that are competent and experienced in such training and who are known to MARTA.

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 2024. To ensure ongoing compliance, MARTA has heightened its efforts to increase sub-recipient tracking and monitoring and provided technical assistance by:

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

XI. LEP Plan Distribution

The LEP Plan objectives and requirements will be:

1. Distributed to all MARTA supervisors who have direct contact with the public.
2. Available in the Office of D&I.
3. Posted on MARTA's website, www.itsmarta.com.
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:

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 to ensure that employees are aware of their obligations for compliance.

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

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

XIV. How Is a Discrimination Complaint Filed?

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

Any person who believes himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color or national origin may by himself or by a representative, file a written complaint with MARTA within 180 days after the date of the

alleged discrimination at: MARTA's Office of D&I, 2424 Piedmont Road, NE, Atlanta, GA 30324, 404-848-5000 (voice).

Failure to file within 180 days may result in dismissal of the inquiry or complaint. In addition, any person who believed himself, herself or any specific class of persons to be subjected to discrimination on the basis of race, color or national origin, may by himself or by a representative, file a complaint with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination at: Federal Transit Administration (FTA) Office of Civil Rights Attention: Complaint Team East Building, 5th Floor – TCR 1200 New Jersey Avenue, SE Washington, DC 20590

The complaint should contain:

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

a. How Will a Complaint Be Resolved?

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

b. Prohibition Against Retaliation for Filing a Complaint

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

XV. Conclusion

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

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

Assisting LEP persons may also help increase and retain ridership among MARTA's broader immigrant communities by reaching out to LEP populations in order to conduct a needs assessment and preparing ongoing future language implementation plans that will send a positive message to LEP persons that their business is valued. Additionally, the interface with LEP populations can increase MARTA's potential for recruiting bilingual employees to better serve the needs of the community. As this LEP plan moves forward, the mutual benefits of inclusion will be gained by patrons, business partners, MARTA, and the general public at-large.