
Title VI Implementation Plan



May 6, 2025, to May 31, 2028

Contents

- Title VI Policy Statement..... 3
- Title VI Notice to the Public 4
- Title VI Notice to the Public – Spanish..... 5
- Title VI Complaint Procedures 6
- Title VI Complaint Forms 15
- Title VI Investigations, Complaints, and Lawsuits 17
- Public Participation Plan..... 18
- Limited English Proficiency Plan 26
- Non-Elected Committees Membership Table 52
- Monitoring for Subrecipient Title VI Compliance..... 53
- Title VI Equity Analysis..... 54
- Regional System-Wide Standards and Policies 55
- Service and Fare Policy Changes 56
- Board Approval for the Title VI Program 57

Title VI Policy Statement

The City of El Mirage and the Valley Metro Regional Public Transportation Authority (Valley Metro) policy assures full compliance with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any City of El Mirage and Valley Metro-sponsored program or activity. There is no distinction between the sources of funding.

The City of El Mirage and Valley Metro also assure that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Furthermore, the City of El Mirage and Valley Metro will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When the City of El Mirage / Valley Metro distributes Federal-aid funds to another entity/person, the City of El Mirage and Valley Metro will ensure all subrecipients fully comply with the City of El Mirage and Valley Metro’s Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to the City Clerk, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

J. Crystal Dyches, City Manager

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI City of El Mirage and Valley Metro

The City of El Mirage / Valley Metro operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of El Mirage and Valley Metro.

For more information on the City of El Mirage and Valley Metro's civil rights program, and the procedures to file a complaint, contact the El Mirage City Clerk, 623-876-2943, (TTY 623-933-3258); email jboltz@elmirageaz.gov; or visit our administrative office at 10000 N. El Mirage Road, El Mirage, AZ 85335. For more information, visit <https://elmirageaz.gov/404/Dial-A-Ride>.

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: City of Phoenix Public Transit Department: ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact 1-800-752-6096. Para información en Español llame: 1-800-752-6096

The above notice is posted in the following locations: City of El Mirage City Hall, 10000 N. El Mirage Road, El Mirage, AZ 85335; the City of El Mirage Senior Center, 14010 N. El Mirage Road, El Mirage, AZ 85335; and all FTA grant-funded transit vehicles.

This notice is posted online at <https://elmirageaz.gov/404/Dial-A-Ride>.

Title VI Notice to the Public – Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI City of El Mirage and Valley Metro

La Ciudad de El Mirage / Valley Metro (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964. El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o país de origen.

Para obtener más información sobre la Ciudad de El Mirage and Valley Metro's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Ciudad de El Mirage City Clerk, 623-876-2943, (TTY 623-933-3258); o visite nuestra oficina administrativa en 10000 N. El Mirage Road, El Mirage, AZ 85335. Para obtener más información, visite <https://elmirageaz.gov/404/Dial-A-Ride>.

El puede presentar una queja directamente con City of Phoenix Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN Title VI Coordinator 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: City of El Mirage City Hall, 10000 N. El Mirage Road, El Mirage, AZ 85335; the City of El Mirage Senior Center, 14010 N. El Mirage Road, El Mirage, AZ 85335; and all FTA grant-funded transit vehicles.

This notice is posted online at <https://elmirageaz.gov/404/Dial-A-Ride>.

Title VI Complaint Procedures

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 which requires that “no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

How do I file a complaint?

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any Valley Metro or City of Phoenix service, program or activity, and believes the discrimination is based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service or directly with the City of Phoenix. This antidiscrimination protection also extends to the activities and programs of Valley Metro’s and City of Phoenix’s third- party Transit Service Provider (TSP) contractors. Valley Metro and the City of Phoenix use the Customer Assistance System (CAS) to capture all complaints received for the regional transit system. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

To submit a complaint online, complete the online complaint form at the following link: www.valleymetro.org/form/title-vi-complaint-form

Complaints can also be submitted in writing using the Title VI complaint form, or by calling Customer Service at (602) 253-5000, TTY: (602) 251-2039. Completed and signed forms should be mailed to:

Regional Public Transportation Authority 4600
East Washington Street, Suite 101
Phoenix, AZ 85034
Email: csr@valleymetro.org
Phone: (602) 253-5000
TTY: (602) 251-2039

The complaint form is located on our website:
<https://www.valleymetro.org/about/civil-rights>

To file a complaint directly with the City of Phoenix:

Attention: Title VI Coordinator
City of Phoenix Public Transit Department 302 N.
1st Avenue, Suite 900
Phoenix, AZ 85003
Email: PHXTransitEO@phoenix.gov
Phones: (602) 262-7242
<https://www.phoenix.gov/publictransit/title-vi-notice>

Individuals may also file complaints directly with the Federal Transit Administration (FTA) within the 180-day timeframe:

Federal Transit Administration (FTA)
Attention: Title VI Coordinator
East Building, 5th Floor –TCR 1200
New Jersey Avenue, SE Washington,
D.C. 20590

Customer Service

Complaints received by Valley Metro Customer Service representatives or by the City of Phoenix Title VI Coordinator will be documented and assigned to the appropriate Transit Service Provider (TSP) (operator or administrator of the service) responsible for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). The TSP has 30 days to investigate each complaint. If more information is needed to resolve the case, the TSP may contact the complainant and request additional information. Complainants must provide additional information within 10 days of the request or the complaint may be deemed undeterminable and will be administratively closed. Cases may also be administratively closed if a complainant informs Valley Metro or the City of Phoenix that they no longer wish to pursue the complaint. Requests to close a complaint can be requested by phone, email or in writing (see contact information above). Complaints may be administratively closed for non-responsiveness by the complainant.

Following the investigation, all complaints shall be concluded with a determination entered in the CAS system. The determination entry shall state the investigation determined the complaint was valid¹, invalid², or undeterminable³. If the investigation determines the alleged Title VI complaint violations of race, color or national origin discrimination are valid, a detailed corrective resolution to remedy the situation shall be provided to the complainant. If the investigation results determine there was no alleged Title VI discrimination based on race, color or national origin, the case will be closed. The complainant shall be notified of the investigation results in the manner identified (email or phone). A complainant can appeal the decision within 60 days of notification of the investigation results. Appeals must be submitted to Valley Metro or the City of Phoenix.

All Title VI complaints and investigations are reviewed by Valley Metro, the Customer Service Administrator (CSA), and City of Phoenix staff.

For more information on Valley Metro's Title VI Program and procedures by which to file a complaint, contact the Title VI Coordinator at (602) 322-4514.

For more information on the City of Phoenix's Civil Rights Program and the procedures by which to file a complaint, contact the Title VI Coordinator at (602) 262-7242.

¹ Valid: fact based, binding, acceptable, enforceable

² Invalid: null and void, unacceptable, unenforceable

³ Undeterminable: incapable of being decided, settled, or fixed; not determinable

Requesting Information

Note: To request information in alternative formats, please contact Customer Service at csr@valleymetro.org or phone: (602) 253-5000 or City of Phoenix (602) 262-7242, TTY: (602) 251-2039

Tracking a Title VI Compliant

As complaints are received, they are logged into the CAS system. Within 24 to 48 hours of logging the complaint, Valley Metro CSA assigns the complaint to the appropriate TSP for investigation and documentation.

The TSP has 30 days to complete their investigation, including obtaining additional information needed from the complainant to investigate or to resolve the case. The investigator will follow the complaint process, and once the investigation is concluded, the case resolution will be documented in the CAS.

The CAS system is programmed to notify the CSA if a complaint has not been responded to within the required time frame. Upon system notification, the CSA will send out a reminder notice to the appropriate TSP that the case is not yet resolved or closed out.

Once the case has been resolved the complainant will receive a response in the manner identified.

Valley Metro and the City of Phoenix monitors the process monthly to ensure Title VI complaints are fully investigated, adequately documented, and that the complainant was responded to in the manner requested. Should an inaccuracy be found, Valley Metro and/or the City of Phoenix will work with CSA and the appropriate TSP to reopen the complaint for further investigation until resolution or completion.

Investigating a Title VI Complaint

Each documented Title VI investigative report must address each of the “Five Federal Investigative” steps found in 28 CFR, Part 35 and FTA Circular 4702.IA. The seven steps are:

STEP ONE: The TSP will review the complaint information entered into CAS by Valley Metro Customer Service staff. Any new issues identified during the investigation should also be documented in CAS.

STEP TWO: Interviews and collections of facts.

- TSP identifies respondents to interview, if needed.
- TSP interviews respondents identified and documents details from the interviews in CAS.
- Investigate every “issue” (stated in the “statement of issues noted in step one).
- Separate facts from opinions.

“Respondent” is not confined to the transit vehicle operator. “Respondent” is defined as *any* source of information that can contribute to the investigation, such as:

- Complainant
- Operator
- Radio/Dispatch/OCC reports

- Maintenance staff
- City Transit staff
- Witnesses
- Other transit employees

The TSP identified, collects, and reviews other information and/or documents that provide facts for the investigation. Any applicable information is to be documented in CAS. Documents to review can include:

- GPS tracking software and programs
- Maintenance records
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Route history
- Other documents deemed appropriate by the TSP

STEP THREE: TSP documents pertinent regulations, rules, policies, and procedures that apply to the investigation in CAS under the case number assigned.

Pertinent regulations, rules, policies, and procedures may include:

- Title VI requirements
- Company rules and procedures
- Valley Metro and City of Phoenix policies and service standards
- Contractual requirements

STEP FOUR: Complaint Determination.

- TSP compares each fact from “findings of fact” to the list of regulations, rules, etc.
- TSP makes a fact-based determination of alleged violation(s).

STEP FIVE: Description of resolution for each valid violation.

- TSP describes specific corrective actions for *each* violation found
- TSP documents follow-up action, if applicable
- TSP documents the complaint resolution in CAS

TSP Complaint Resolution(s):

- Must include specific complaint resolutions for each valid violation noted.
- Document a follow-up action plan, where applicable.
- If no valid violations are found, note policies, procedures, etc. reviewed during the investigation and with transit operator.
- Documented complaint information should always include staff initials, title, and dates.

Response to Customer

TSP will respond to the Customer in the manner identified and will document the response provided in CAS under the case number assigned.

Procedimientos de Quejas del Título VI

¿Qué es el Título VI?

El Título VI es una sección del Decreto de los Derechos Civiles de 1964 que requiere que “ninguna persona en los Estados Unidos deberá, basándose en su raza, color u origen nacional, ser excluida de participar en, ser denegada de los beneficios de, o verse sujeta a discriminación bajo cualquier programa o actividad recibiendo asistencia financiera federal.”

¿Cómo registro una queja?

Cualquier persona que crea que ha sido excluida de la participación en, se le hayan denegado los beneficios de, o de otra manera se haya visto sujeta a discriminación ilegal bajo cualquier servicio, programa o actividad de Valley Metro o de la Ciudad de Phoenix, y crea que la discriminación se basa en raza, color u origen nacional, puede registrar una queja formal con el Servicio al Cliente de Valley Metro o directamente con la Ciudad de Phoenix. Esta protección antidiscriminatoria también se extiende a las actividades y los programas de los contratistas terceros Proveedores de Servicios de Transporte (TSP por sus siglas en inglés) de Valley Metro y la Ciudad de Phoenix. Valley Metro y la Ciudad de Phoenix usan el Sistema de Asistencia al Cliente (CAS por sus siglas en inglés) para capturar todas las quejas recibidas por el sistema regional de transporte. Cualquier queja de este tipo debe registrarse dentro de los 180 días del presunto acto discriminatorio (o de la última vez que haya ocurrido).

Para enviar una queja en línea, llene la forma de quejas en línea en el siguiente enlace: www.valleymetro.org/form/title-vi-complaint-form

Las quejas también se pueden registrar por escrito usando la forma de quejas del Título VI, ó llamando a Servicio al Cliente al (602) 253-5000, TTY: (602) 251-2039. Las formas llenas y firmadas se deben enviar por correo postal a:

Regional Public Transportation Authority 4600
East Washington Street, Suite 101
Phoenix, AZ 85034
Correo electrónico: csr@valleymetro.org
Teléfono: (602) 253-5000
TTY: (602) 251-2039

La forma de la queja se encuentra en nuestro sitio web: <https://www.valleymetro.org/about/civil-rights>

Para registrar una queja directamente con la Ciudad de Phoenix:

Attention: Title VI Coordinator
City of Phoenix Public Transit Department 302 N.
1st Avenue, Suite 900
Phoenix, AZ 85003

Correo electrónico: PHXTransitEO@phoenix.gov Teléfono:
(602) 262-7242 <https://www.phoenix.gov/publictransit/title-vi-notice>

Los individuos también pueden registrar quejas directamente con la Administración Federal de Transporte (FTA por sus siglas en inglés) dentro de un período de tiempo de 180 días:

Federal Transit Administration (FTA)
Attention: Title VI Coordinator
East Building, 5th Floor –TCR 1200
New Jersey Avenue, SE Washington,
D.C. 20590

Servicio al Cliente

Las quejas recibidas por los representantes de Servicio al Cliente de Valley Metro o por el Coordinador del Título VI de la Ciudad de Phoenix serán documentadas y asignadas al Proveedor de Servicios de Transporte (TSP por sus siglas en inglés) (operador o administrador del servicio) apropiado responsable de la investigación en conformidad con los estándares federales (28 CFR Parte 35 y Circular 4702.1B de la administración FTA). El proveedor TSP tiene 30 días para investigar cada queja. Si se necesita más información para resolver el caso, el proveedor TSP puede ponerse en contacto con el/la reclamante y solicitar información adicional. Los reclamantes deben proporcionar la información adicional dentro de los 10 días posteriores a la solicitud o la queja puede considerarse indeterminable y se cerrará administrativamente. Los casos también se pueden cerrar administrativamente si un/a reclamante informa a Valley Metro o a la Ciudad de Phoenix que ya no desea continuar con la queja. Las solicitudes para cerrar una queja se pueden hacer por teléfono, por correo electrónico o por escrito (vea arriba la información de contacto). Las quejas se pueden cerrar administrativamente si el/la reclamante falle en responder.

Después de la investigación, todas las quejas deberán ser concluidas con una determinación ingresada al sistema CAS. La entrada de la determinación deberá indicar que la investigación determinó que la queja era válida¹, inválida² ó indeterminable³. Si la investigación determina que las presuntas infracciones de la queja bajo el Título VI de discriminación por raza, color u origen nacional son válidas, se deberá proveer al/la reclamante una resolución correctiva detallada para remediar la situación. Si los resultados de la investigación determinan que no hubo una presunta discriminación bajo el Título VI basada en raza, color u origen nacional, el caso se cerrará. El/la reclamante deberá ser notificado/a de los resultados de la investigación en la forma identificada (correo electrónico o teléfono). Un/a reclamante puede apelar la decisión dentro de los 60 días siguientes a la notificación de los resultados de la investigación. Las apelaciones se deben enviar a Valley Metro o a la Ciudad de Phoenix.

¹ Válida: basadas en los hechos, vinculante, aceptable, ejecutable

² Inválida: nula e inválida, inaceptable, inejecutable

³ Indeterminable: incapaz de llegar a una decisión, asentada, osolucionada; no es determinable

Todas las quejas e investigaciones del Título VI son revisadas por Valley Metro, el Administrador de Servicio al Cliente (CSA por sus siglas en inglés), y el personal de la Ciudad de Phoenix.

Para más información sobre el Programa del Título VI de Valley Metro y los procedimientos para registrar una queja, llame al Coordinador del Título VI al (602) 322- 4514.

Para más información sobre el Programa de Derechos Civiles de la Ciudad de Phoenix y los procedimientos para registrar una queja, llame al Coordinador del Título VI al(602) 262-7242.

Solicitando Información

Nota: Para solicitar información en formatos alternativos, por favor comuníquese con Servicio al Cliente en csr@valleymetro.org o por teléfono: (602) 253-5000 ó con la Ciudad de Phoenix al (602) 262-7242, TTY: (602) 251-2039

Rastreado Una Queja del Título VI

A medida que se van recibiendo las quejas, éstas son ingresadas al sistema CAS. Dentro de 24 a 48 horas de registrar la queja, el administrador CSA de Valley Metro asigna la queja al proveedor TSP apropiado para su investigación y documentación.

El proveedor TSP tiene 30 días para completar su investigación, incluyendo la obtención de la información adicional necesaria del/la reclamante para investigar o para resolver el caso. El investigador seguirá el proceso de quejas, y una vez que concluya la investigación, la resolución del caso se documentará en el sistema CAS.

El sistema CAS está programado para notificarle al administrador CSA si una queja no ha sido contestada dentro del plazo requerido. Tras la notificación del sistema, el administrador CSA enviará un aviso de recordatorio al proveedor TSP correspondiente de que el caso aún no se ha resuelto o cerrado.

Una vez resuelto el caso, el/la reclamante recibirá una respuesta en la forma identificada.

Valley Metro y la Ciudad de Phoenix monitorean el proceso mensualmente para asegurar que las quejas del Título VI se investiguen a fondo, se documenten adecuadamente, y se le conteste al/la respondiente de la manera solicitada. En caso de que se encuentre un error, Valley Metro y/o la Ciudad de Phoenix trabajarán con el administrador CSA y el proveedor TSP apropiado para volver a abrir la queja para una investigación adicional hasta su resolución o finalización.

Investigando Una Queja del Título VI

Cada reporte de investigación documentado del Título VI debe abordar cada uno de los “Cinco Pasos de Investigaciones Federales” que se encuentran en 28 CFR, Parte 35 y la Circular 4702.IA de la administración FTA. Los siete pasos son:

PASO UNO: El proveedor TSP revisará la información de la queja ingresada al sistema CAS por el personal de Servicio al Cliente de Valley Metro. Cualquier nuevo asunto identificado durante la investigación también se debe documentar en el sistema CAS.

PASO DOS: Entrevistas y recolecciones de los hechos.

- El proveedor TSP identifica a los respondientes a ser entrevistados, si es necesario.
- El proveedor TSP entrevista a los respondientes identificados y documenta los detalles de las entrevistas en el sistema CAS.
- Se investiga cada “asunto” (indicado en la declaración de asuntos que se indica en el paso uno).
- Se separan los hechos de las opiniones.

El/la “respondiente” no se limita al/la conductor/a del vehículo de transporte. El/la “respondiente” se define como *cualquier* fuente de información que pueda contribuir a la investigación, tal como:

- Reclamante
- Conductor/a
- Reportes de radio/despacho/OCC
- Personal de mantenimiento
- Personal de Transporte de la Ciudad
- Testigos
- Otros empleados de transporte

El proveedor TSP identifica, recopila, y revisa otra información y/o documentos que provean los hechos para la investigación. Cualquier información aplicable se debe documentar en el Sistema CAS. Los documentos por revisar pueden incluir:

- Software y programas de rastreo GPS
- Registros de mantenimiento
- Reportes de observador “Spotter”
- Grabaciones de video (cámara) y/o audio
- Tarjetas de cortesía
- Reportes de incidentes (supervisor, policía de transporte, inspectores de pasajes/seguridad)
- Historial de la ruta
- Otros documentos que el proveedor TSP considere apropiados

PASO TRES: El proveedor TSP documenta las regulaciones, reglas, normas, y procedimientos pertinentes que sean aplicables a la investigación en el sistema CAS bajo el número de caso asignado.

Las regulaciones, reglas, normas y procedimientos pertinentes pueden incluir:

- Requerimientos del Título VI
- Reglas y procedimientos de la compañía
- Normas y estándares de servicio de Valley Metro y la Ciudad de Phoenix
- Requerimientos contractuales

PASO CUATRO: Determinación de la queja.

- El proveedor TSP compara cada hecho de “hallazgos de hechos” con la lista de regulaciones, reglas, etc.
- El proveedor TSP hace una determinación basada en hechos de la/s presunta/s infracción/es.

PASO CINCO: Descripción de la resolución para cada infracción válida.

- El proveedor TSP describe las acciones correctivas específicas para *cada* infracción que haya sido encontrada
- El proveedor TSP documenta la acción de seguimiento, si es aplicable
- El proveedor TSP documenta la resolución de la queja en el sistema CAS

Resolución/es de Quejas del Proveedor TSP:

- Debe incluir resoluciones específicas a las quejas para cada infracción válida anotada.
- Documentar un plan de acción de seguimiento, cuando sea aplicable.
- Si se encuentran infracciones válidas, anotar las normas, los procedimientos, etc. revisados durante la investigación y con el/la conductor/a de transporte.
- La información documentada de la queja siempre debe incluir las iniciales del personal, el título, y las fechas.

Respuesta al/la Cliente

El proveedor TSP le contestará al/la Cliente de la manera identificada y documentará la respuesta provista en el sistema CAS bajo el número de caso asignado.

Title VI Complaint Forms

TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix or any of its service providers and believes the discrimination was based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service.

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at 602.253.5000 (TTY: 602.251.2039) or via email at csr@valleymetro.org.

SECTION 1: CUSTOMER INFORMATION

First Name: _____ Last Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Home Phone: _____ Cell Phone: _____
Email: _____ Preferred method of contact: Phone Email

SECTION 2: INCIDENT INFORMATION

Date of Incident: _____ Time of Incident: _____ AM PM City: _____
Incident Location: _____ Direction of Travel: _____
Route #: _____ Bus/Light Rail/Streetcar #: _____
Service Type: Local Bus Express/RAPID Circulator/Connector Light Rail Streetcar Dial-a-Ride
Operator Name: _____
Operator Description: _____
What was the discrimination based on (Check all that apply): Race Color National Origin Other _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? Yes No

If yes, please provide information about a contact person at the FTA where the complaint was filed:

Name: _____ Title: _____
Address: _____ Phone: _____
Have you previously filed a Title VI complaint with this agency? Yes No
Signature and date required below:

Signature _____
Date _____



FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) ó por correo electrónico a csr@valleymetro.org.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre: _____ Apellido: _____
Domicilio: _____
Ciudad: _____ Estado: _____ Código Postal: _____
Teléfono del Hogar: _____ Teléfono Celular: _____
Correo Electrónico: _____ Método preferido de contacto: Teléfono Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente: _____ Hora del Incidente: _____ AM PM Ciudad: _____
Ubicación del Incidente: _____ Dirección del Viaje: _____
Ruta #: _____ Autobús/Tren Ligero/Tranvía #: _____
Tipo de Servicio: Autobús Local Express/RAPID Circulador/Conector Tren Ligero Tranvía Dial-a-Ride
Nombre del/la Operador/a: _____
Descripción del/la Operador/a: _____
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable):
 Raza Color Origen Nacional Otro _____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? Sí No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:

Nombre: _____ Título: _____
Domicilio: _____ Teléfono: _____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? Sí No

Firma y fecha requeridas abajo:

Firma _____
Fecha _____



Title VI Investigations, Complaints, and Lawsuits

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

The City of El Mirage has not had any Title VI complaints, investigations, or lawsuits from May 1, 2021, through January 9, 2025.

Public Participation Plan

*The City of El Mirage /
Valley Metro*

Public Participation Plan



City of
EL MIRAGE

Arizona

GRAND HERITAGE, BRIGHT FUTURE! SM

The City of El Mirage is adopting the Valley Metro Public Participation Plan to engage the public in transit-related activities and actions. Valley Metro conducts the regional transit public input/outreach process. The public will be invited to participate in the process, whether through public meetings or surveys.

Public Meetings

- (1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.
- (2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.
- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

The City of El Mirage / Valley Metro submits an application for funding to the Arizona Department of Transportation annually. Part of the application is a public notice, which includes a 30-day public comment period.



Valley Metro Public Participation Plan 2021

Introduction

The regional transit public input/outreach process is conducted by Valley Metro for various transit-related activities and actions. Throughout the year, Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes, and other transit-related events. This Title VI Public Participation Plan was established to ensure inclusion of the public throughout the Phoenix metropolitan community in accordance with the content and considerations of Title VI of the Civil Rights Act of 1964. Federal regulations state that recipients of federal funding must “promote full and fair participation in public transportation decision-making without regard to race, color or national origin.” Valley Metro uses this Plan to ensure involvement of low-income, minority and limited English proficient (LEP) populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular¹ (Circular).

Involving the public in Valley Metro practices and decision-making processes provides helpful information to improve the transit system to better meet the needs of the community. Although public participation methods and extent may vary with the type of plan, program and/or service under consideration, as well as the resources available, a concerted effort to involve all affected parties will be conducted in compliance with this Plan along with federal regulations. To include effective strategies for engaging low-income, minority and LEP populations, the Circular suggests that the following may be considered:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Considering transit information in publications and through communication channels that serve LEP populations.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

¹ United States Department of Transportation, Federal Transit Administration, Circular 4702.1B.

Valley Metro currently practices all these strategies, in compliance with federal regulations, so that minority, low-income and LEP populations have ready access to information and meaningful opportunities to engage in planning activities and provide input as part of the decision-making process.

Typical Public Participation Opportunities

Valley Metro provides opportunities to share information or receive public input through a variety of methods for public participation utilized to engage low-income, minority and LEP populations through many outlets.

Meeting Planning: For planning efforts, including fare and service changes, public meeting locations are held at a centralized location near the affected route or project area and bilingual staff is available. Public notices and announcements are published in minority-focused publications— some examples include: the *Arizona Informant* (African American community), *Asian American Times* (Asian American community), *La Voz* and *Prensa Arizona* (Hispanic community). Press releases are also sent to these media sources regarding fare changes, service changes and other programs. All printed materials are available in English and Spanish and translated, as requested, in any other languages.

Rider Satisfaction Survey: A key participation effort, the Rider Satisfaction Survey, is conducted approximately every two years. This survey is administered on transit routes across the region, reaching transit riders living in minority and/or low-income communities. The survey, administered in English and Spanish, measures rider satisfaction with transit services and captures comments for improvements.

Valley Metro Customer Service: Throughout the year, minority, low-income and LEP populations have access to information through the Valley Metro Customer Service. Valley Metro Customer Service is open 5 a.m. - 10 p.m., Monday through Friday; 6 a.m. - 8 p.m. on Saturdays; and 8 a.m. - 5 p.m. on Sundays and designated holidays. Customer Service staff is multilingual.

Website: Information including meeting announcements, meeting materials and other program information is available on valleymetro.org in both English and Spanish. If users would like information in another language, Valley Metro features Google Translate on its website. This allows Valley Metro to reach citizens in five languages with information on transportation services, proposed service changes and other programs.

Public Participation Methods

Valley Metro uses several specific public involvement techniques to ensure that minority, low-income and LEP persons are involved in transit decisions. Using public involvement, media outlets and print or electronic materials, Valley Metro disseminates information regarding planning efforts. These efforts include the activities described below.

A full list of potential outreach methods is found in Appendix A.

Common Best Practices:

- Public meetings, hearings and open houses are held regularly at community- familiar and centralized locations with public transportation access and at convenient times, in collaboration with city partners. These meetings provide an opportunity to meet with citizens and receive their comments and questions on proposed service changes and other programs. For each program, Valley Metro varies its meeting format to best engage the targeted population.
- Valley Metro has staff available at public meetings, hearings, events and open houses to answer questions and receive comments in both English and Spanish. Valley Metro also uses court reporters to record verbal comments at public hearings.
- Outreach for biannual service changes and other programs are conducted at or near the affected area— for example, along an affected bus route or at an affected transfer location— thus targeting the population that may be most affected by proposed changes to service or routes. Often, these efforts are also executed at transit stops, community centers, civic centers or major transfer locations.
- Coordination with community- and faith-based organizations, educational institutions and other organizations occurs regularly. These coordination efforts assist Valley Metro in executing public engagement strategies that reach out to members of the population that may be affected.
- All public meeting notices for biannual service changes and other programs are translated to Spanish. Notices regarding Valley Metro projects and programs are widely distributed to the public through multiple methods as established by the project team. A full list of potential outreach methods is found in Appendix A.
- Valley Metro publishes advertisements of any proposed service or fare change in minority publications to make this information more easily available to minority populations. Additionally, Valley Metro sends press releases regarding service changes and other programs to Spanish-language media. Depending on the level of impact, a formal media/communications plan can be developed to coordinate overall messaging across multiple stakeholders.
- Valley Metro offers online participation via social media, webinar and email input as an alternative opportunity for comment. Online meetings or hearings are recorded and uploaded to the Valley Metro YouTube channel and/or website.
- Major surveying efforts are conducted in both English and Spanish to ensure that the data collected is representative of the public.
- Valley Metro Customer Service is multilingual

- All comments are documented in a centralized database. Comment summary information is provided to Valley Metro’s city partners for review and is also presented to the Valley Metro Board of Directors for consideration when acting upon proposed service changes.
- A public hearing is a formal presentation to the public on specific proposal or subject. Public testimony is recorded into the official record. The rules governing a public hearing are more formal than that of a public meeting, where a variety of tools and techniques may be used to gather feedback from the public. A public hearing may take place in-person, via teleconference, or online. Public comment must be recorded and transcribed, either via electronic means or a court reporter.

A public hearing is required during:

- The development of an Environmental Impact statement.\
- A Major Service Change, as defined by the Major Service Change & Service Equity Policy.

Conclusion

Valley Metro conducts public outreach throughout the year to involve the public with agency activities and transit planning processes. Using a variety of communication techniques such as facilitating meetings at varied times and locations, using multiple formats, placing print and digital materials across multiple channels and providing opportunities via phone and online to share or collect input, Valley Metro ensures that outreach efforts include opportunities for minority, low-income and LEP populations who may be impacted by the activity or transit planning process are integrated into the decision-making process. Valley Metro will continue to involve all communities to be inclusive of all populations throughout the metropolitan Phoenix area and to also comply with federal regulations. Valley Metro will continue to monitor and update this Inclusive Public Participation Plan as part of the Title VI Program, which is updated triennially

Appendix A

Valley Metro reviews public outreach needs with the project/initiative team as part of the initial development of the designated Public Involvement Plan. Major tactics are outlined to develop the overall timeline. Depending upon the scope of the project, program or announcement, public participation methods are customized to ensure that the public is involved in the decision-making process.

A list of commonly used outreach tools, as well as their definition and associated Valley Metro standard of best practice, is listed below.

Outreach Tool	Definition and Best Practices
Public Hearing	A formal meeting with a set agenda during which a presentation is given, and public testimony/feedback is heard and recorded. Can take place in-person, via teleconference, or online. For public hearings, adequate notice to the public is defined as a minimum of 30 days to the hearing date. A hearing is advertised with an appropriate outreach tactic at least four times within 30 days of the meeting date. Public comment must be recorded and transcribed, either via electronic means or via a court reporter.
Public Meeting	A meeting during which material is presented and public comment is heard and recorded. The material may be offered via a presentation, workshop or “open house.” Can take place in-person, via teleconference, or as a webinar online. For public meetings, adequate notice to the public is defined as a minimum of 15-days prior to the meeting date. A meeting is advertised at least twice via an appropriate outreach tactic within 15 days of the meeting date.
Display Ads in Print Media	A paid advertisement in the newspapers or other print media to alert readers about an upcoming event or action.
Website/Online Social Media	Information on projects or initiatives located on the Valley Metro website or Valley Metro social channels (Instagram, Facebook, Twitter)
Stakeholder meetings	Information provided to local, targeted individuals or groups particularly affected by project. The presentation may be formal, a workshop or in “open house” style. Typically, stakeholder meetings are invitation-only and so do not need to be publicly advertised beforehand. Can take place in-person, via teleconference, or as a webinar online.

Mobile Device Alerts	Electronic push notifications to alert customers to important information on projects or service changes via Valley Metro-owned mobile apps (AlertVM, ConstructVM, mobile fare app).
Signs	Signs on buses, bus stop locations, transit centers or other locations frequented by stakeholders. This includes temporary signs, A-frames or kiosk posters.
Rider Alerts	Notifications regarding immediate rider information on impacts to frequency, routing or schedule. Rider Alerts may be web-based, printed on signs and/or submitted as a memo to Customer Service & Operations.
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input.
Surveys	A list of questions to solicit opinions or preferences by a selected group of individuals. The survey mechanism may be electronic and/or in-person. The survey population may be intercepted or self-selected. For surveys, the feedback collection period is defined as a minimum of 15 days.
Static Display	Table or sign display at a trafficked event or area in an identified area where a targeted stakeholder group may be present. The display may be manned or unmanned and will have specific information on the project/initiative. This may also include a feedback mechanism, such as comment cards.
Door Hanger/Flyer Canvassing	Print notice distributed to local businesses and residents in project/affected area.
E-mail/E-blast	Digital messaging to an established Valley Metro email list. Stakeholders may opt-in or out of this list based on their needs.

Limited English Proficiency Plan

*City of El Mirage /
Valley Metro*

Limited English Proficiency Plan



The City of El Mirage / Valley Metro has developed the following Limited English Proficiency Plan (LEP) / Language Assistance Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of El Mirage / Valley Metro services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City of El Mirage / Valley Metro's extent of obligation to provide LEP services, the City of El Mirage / Valley Metro undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the City of El Mirage / Valley Metro service area who may be served or likely to encounter by City of El Mirage / Valley Metro program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with City of El Mirage / Valley Metro services;
- 3) The nature and importance of the program, activities or services provided by the City of El Mirage / Valley Metro to the LEP population; and
- 4) The resources available to City of El Mirage / Valley Metro and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision

The City of El Mirage / Valley Metro complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

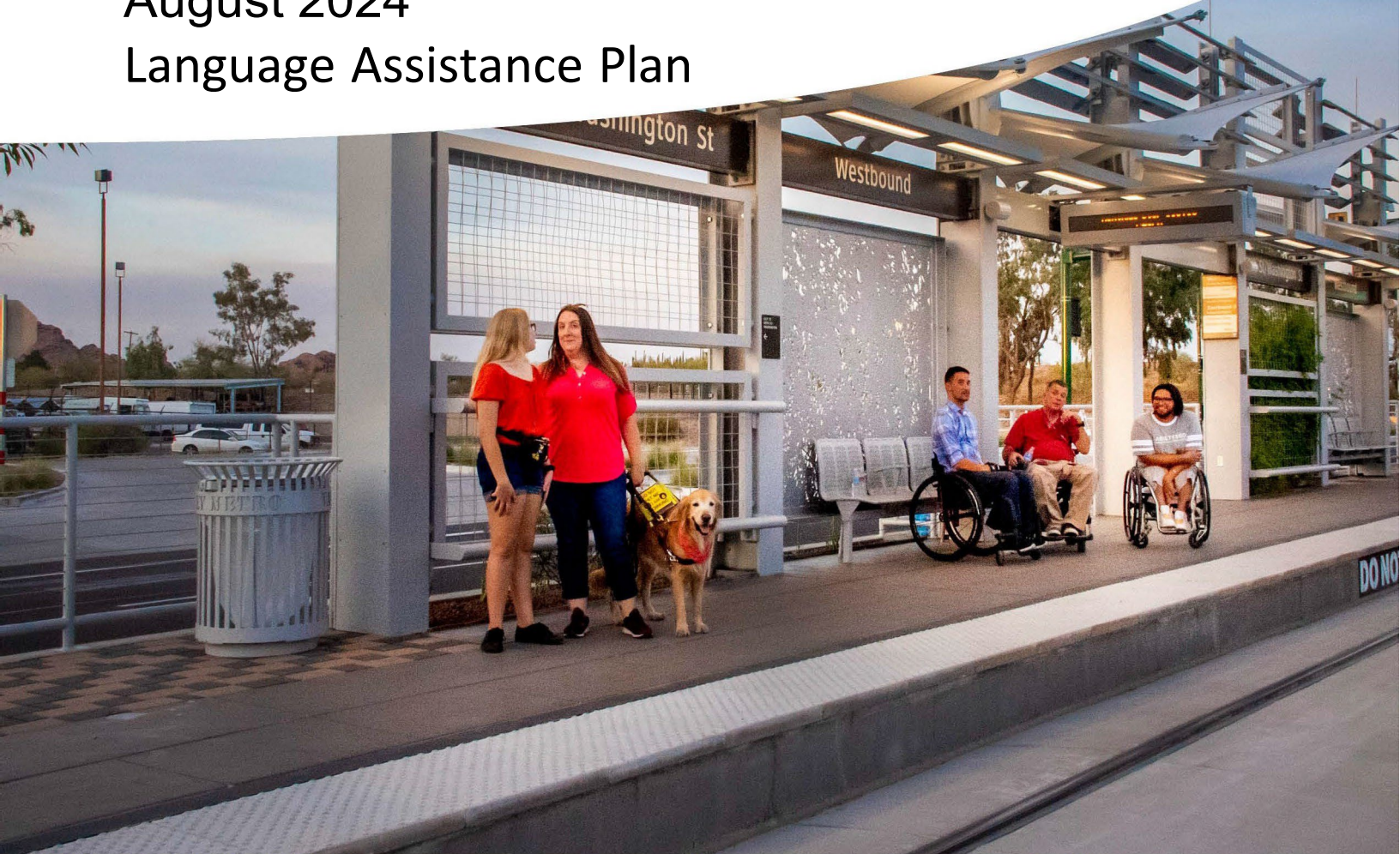
- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearing

VALLEY METRO

Title VI Program

August 2024

Language Assistance Plan



AUGUST 2024



1.0 INTRODUCTION

In 1993, the Valley Metro Regional Public Transportation Authority (RPTA) board adopted the name “Valley Metro” as the identity for the regional transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that serves more than 36 million rides annually. Valley Metro provides fixed-route bus service, light rail service, streetcar service and complementary paratransit service across the region. Valley Metro provides services with and distributes transit funds from the countywide transit sales tax to its member agencies including Maricopa County and the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, Fountain Hills, Queen Creek, and Youngtown. For the most part, Valley Metro and its member agencies use private service providers for the operation of bus, light rail and paratransit services. The Cities of Glendale, Scottsdale, Peoria and Phoenix contract some of their service directly to service providers.

Currently, fixed-route transit service in the metropolitan area is operated by the City of Phoenix, Valley Metro, Scottsdale and Glendale. There is a total of 872 fixed-route buses, 61 light rail vehicles and 6 streetcar vehicles operating in the region.

The regional transit system has 61 local bus routes that consist of the following: 45 local bus routes, 15 key local bus routes and 1 limited-stop peak route. The region also has 19 Express/RAPID routes, 17 community circulator routes, 1 rural connector route, 1 light rail line and one streetcar line. Valley Metro customers made over 36.8 million boardings during fiscal year 2023.

Four entities in the region provide Dial-a-Ride service for seniors and persons with disabilities, as well as Americans with Disabilities Act (ADA) paratransit service for those who are unable to use fixed-route bus service. Annual regional ridership for ADA paratransit and regional ridership for non-ADA general Dial-a-Ride was over 900,000

In addition, Valley Metro’s Commute Solutions team supports Valley organizations in the mandatory Maricopa County Travel Reduction Program. Toward that goal, the team provides a multipurpose platform at www.ShareTheRide.com that allows commuters to search for carpools, vanpools, transit and bike buddies. In addition to providing this multimodal support, it provides pollution and commute information. In an ongoing effort to educate, the team also provides online training, informational webinars, special promotions for the general public and transportation coordinators.

In 2002, Valley Metro Rail, Inc., a nonprofit agency, was created and charged with the design, construction, and operation of the region’s 57-mile high-capacity transit system. Valley Metro Rail Board member cities include Phoenix, Tempe, Mesa and Chandler. The Board establishes overall policies and provides general oversight of the agency and its responsibilities.

In November 2004, Maricopa County voters passed Proposition 400, which provides funding from a portion of a half-cent sales tax to fund transit projects in the Regional

Transportation Plan. The 20-mile light rail starter line (Central Phoenix/East Valley) became operational within the cities of Phoenix, Tempe and Mesa on December 27, 2008. Since 2008, the completion of four light rail extensions have increased the length of the light rail system to 30 miles. The Mesa Dr/Main St. extension, a 3.1-mile project that brought light rail into downtown Mesa, began operations in 2015. In March 2016, the 19th Ave/Dunlap extension in Phoenix opened—adding 3.2 miles to the system. The Gilbert Road Extension, a 1.9-mile project on Main Street to Gilbert Road in Mesa, began operations in 2019. And the Northwest Phase II extension, a 1.6-mile project extending the system northwest from 19th Ave/Dunlap to Metro Center, opened in January 2024. In addition, Valley Metro and the City of Tempe opened a 3-mile streetcar project in May 2022, running through Downtown Tempe and the Arizona State University-Tempe campus. Valley Metro and the City of Phoenix are progressing construction of the South Central Extension/Downtown Hub, a 5.5-mile extension of light rail on Central Avenue to Baseline Road, which is expected to open in mid-2025. Valley Metro and the region support the goal of the U.S. Department of Transportation (USDOT) limited English proficient (LEP) guidance to provide meaningful access to its services by LEP persons. The Federal Transit Administration (FTA) notes that transit agencies that provide language assistance to LEP persons in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from using the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

1. Regulatory Guidance

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

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” issued on August 11, 2000, directs each federal agency to publish guidance for its respective recipients to assist with its obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Providing English- only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

The FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, issued in October 2012 reiterates this requirement. Chapter III states that “...FTA recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (page III-6).”

In the Phoenix Metropolitan Area, there are more than sixty different languages identified in households where English is not the predominate language. Using the “Four Factor Analysis” prescribed by FTA, this plan was developed to ensure that all transit providers effectively communicate with all users of the public transportation agency’s services provided.

1.1 Four Factor Analysis

FTA Circular 4702.1B identifies four factors that recipients of federal funds should follow when determining what reasonable steps should be taken to ensure meaningful access for LEP persons.

The four-factor analysis involves the following:

1. Identify the number or proportion of LEP persons eligible to be served or likely to be encountered with transit service.
2. Determine the frequency with which LEP individuals come in contact with transit service.
3. Determine the nature and importance of transit service provided to LEP individuals.
4. Assess the resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

This document describes Valley Metro’s four-factor analysis and summarizes its LEP efforts, including staff training, followed by a description of how the plan will be monitored and updated.

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

Factor 1 assesses the number and proportion of persons with limited English speaking proficiency likely to be encountered within the region’s service area, which is defined as a three-quarter mile radial buffer around all fixed route services and a three-mile buffer around park-and-ride and transit facilities for express bus service. The LEP population is those individuals who reported to the Census Bureau that they speak English “less than very well.”

2.1 Evaluation Methods and Data Source

In accordance with FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. The presence of LEP populations in the regional service area was determined by analyzing the U.S. Census Bureau, 2022 American Community Survey (ACS) 5-year Sample.

2.2 LEP Population Identification

FTA describes LEP persons as having a limited ability to read, write, speak, or understand English. For this LEP analysis, those who reported to the Census Bureau that they speak English “less than very well” were used to tabulate the LEP population for the regional service area.

2.3 American Community Survey

The ACS is a continuous nationwide survey conducted monthly by the U.S. Census Bureau to produce annually updated estimates for the same small area (census tracts and block groups) formerly surveyed through the decennial census long-form survey. It is intended to measure changing socioeconomic characteristics and conditions of the population on a recurring basis. It is important to note that the ACS does not provide official counts of the population between each decennial census, but instead provides weighted population estimates. This analysis uses the 2022 ACS 5-Year data (2018 to 2022).

ACS data include the number of persons ages five and above who self-identified their ability to speak English as “very well,” “well,” “not well,” and “not at all.” Figure 1 depicts Valley Metro’s service area. Table 1 shows the number of LEP people within Valley Metro’s service area in comparison to Maricopa County. There are over 4 million residents in Maricopa County, and 3.5 million reside within Valley Metro’s service area. The incidence of LEP persons within Valley Metro’s service area is slightly higher than in the county. 8.3 percent of residents in Maricopa County speak English less than “very well,” while 9.3 percent of residents within Valley Metro’s service area speak English less than “very well.”

FIGURE 1: VALLEY METRO SERVICE AREA

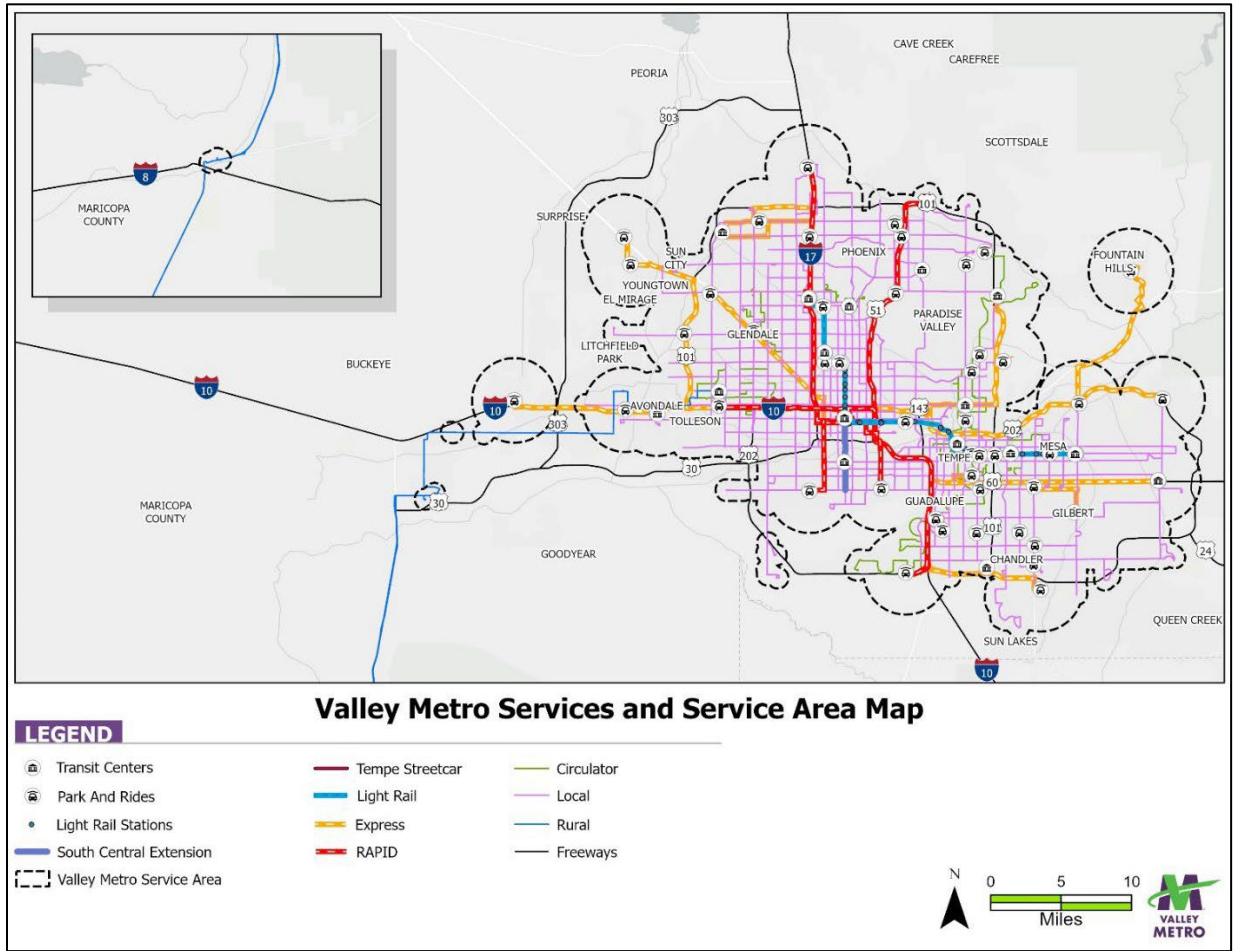


TABLE 1: 2022 ACS DATA, BY LOCATION

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
Maricopa County	4,171,400	3,068,856	756,667	345,877	8.29
Census tracts within service area ^a	3,418,601	2,420,722	678,529	319,350	9.34

^a Service area is defined as a ¾-mile buffer within local fixed-route service and a 3-mile buffer within park-and-ride and transit facilities for express bus service.

Table 2 shows English proficiency for the census tracts within the service area population age five years and above by the linguistic categories identified by the U.S. Census Bureau. This includes English, Spanish, Indo-European, Asian or Pacific Islander, and all other languages. The 2022 ACS data show the population self-identified as speaking English less than “very well” was predominantly the Spanish-language group, encompassing 251,891 people, or 7.37 percent of the total population age five years and over. Indo-European, Asian or Pacific Islander, and all other languages groups account for 67,459 people, or 1.9 percent of the population. Of all those speaking English less than “very well,” the Spanish group makes up 79 percent of the total population over age five with limited English proficiency.

TABLE 2: 2022 ACS DATA, BY LANGUAGE CATEGORY

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
Total	3,418,601	678,529	148,286	115,239	55,825	9.34
English	2,420,722	—	—	—	—	—
Spanish	774,086	522,195	104,440	96,515	50,936	7.37
Asian or Pacific Islander	88,365	55,237	20,420	9,973	2,735	0.97
Indo-European	84,788	65,337	13,667	4,844	940	0.57
All other languages	50,640	35,760	9,759	3,907	1,214	0.44

The 2022 ACS data also provide information on linguistically isolated households: “A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English ‘very well.’ In other words, all members 14 years old and over have at least some difficulty with English” (ACS 2022). In total, the 2022 ACS data identified 1,448,742 households to be linguistically isolated. The entire membership of a linguistically isolated household would be considered LEP. **Table 3** details those data for linguistically isolated and non-linguistically isolated households by language category within the service area.

TABLE 3: 2022 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census tracts in service area	1,448,742	58,003	365,330	4
English	1,007,048	—	—	—
Spanish	301,679	38,366	263,313	2.6
Asian or Pacific Islander	45,200	7,767	37,433	0.54
Indo-European	71,129	4,745	43,983	0.33
All other languages	23,686	7,125	20,601	0.49

Within the transit service area, 4 percent of households are considered linguistically isolated. Again, these are predominantly Spanish households, making up 2.6 percent of the total. Remaining languages make up 1.36 percent of households that are classified as linguistically isolated.

Figure 2 shows concentrations of linguistically isolated households in census tracts within the service area. Most areas throughout the region are mixed, although a few pockets of census blocks have concentrations of linguistically isolated households, thus identified as persons with limited English proficiency.

Figure 3 shows the ACS 2022 census tracts within the three-quarter mile buffer of local fixed-route service and a three-mile buffer around park-and-ride and transit facilities for express bus service. Census tracts encapsulated within this area are included in the estimates, although they may not be within one-quarter mile of a fixed route.

FIGURE 2: CENSUS TRACTS WITH LINGUISTICALLY ISOLATED HOUSEHOLDS

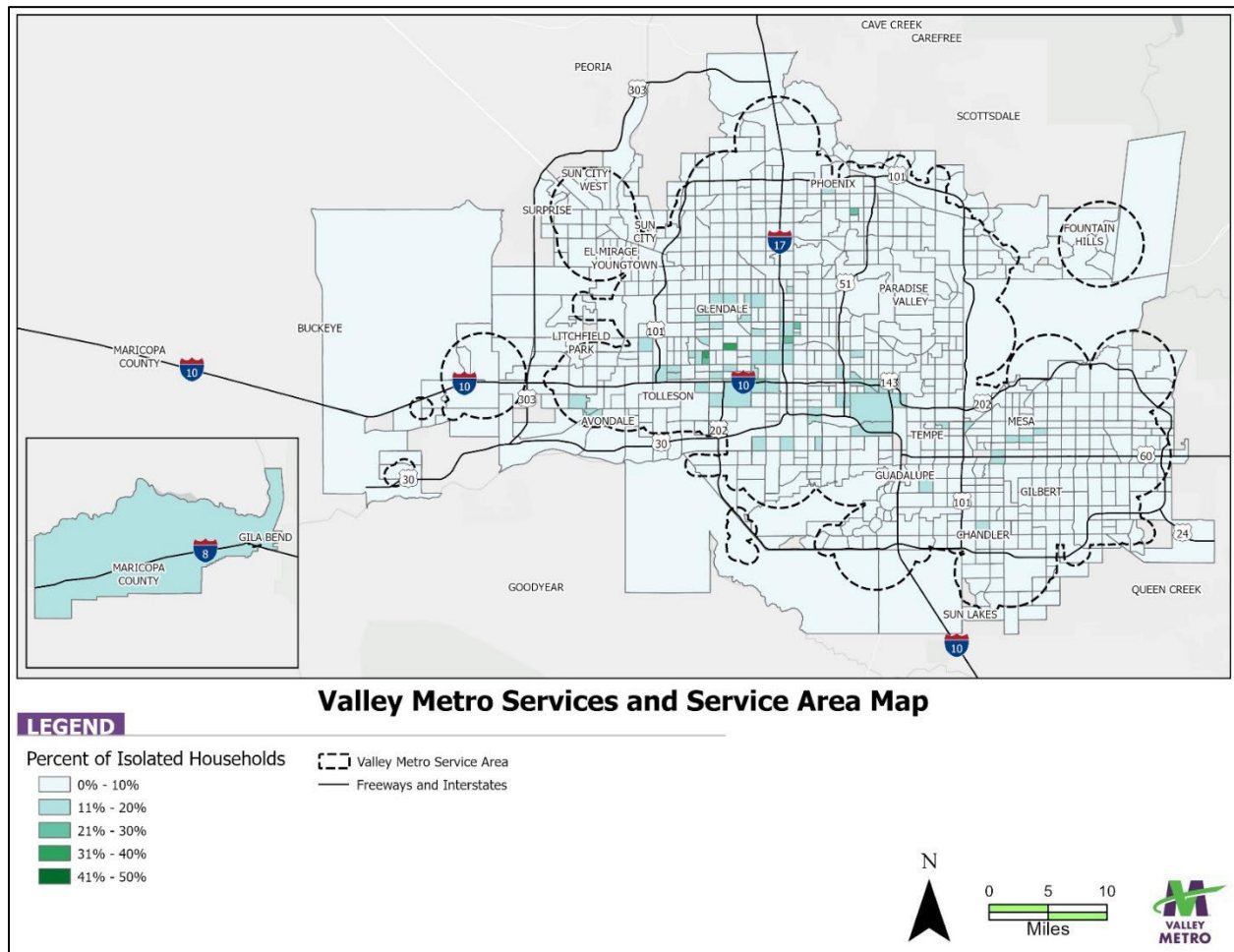
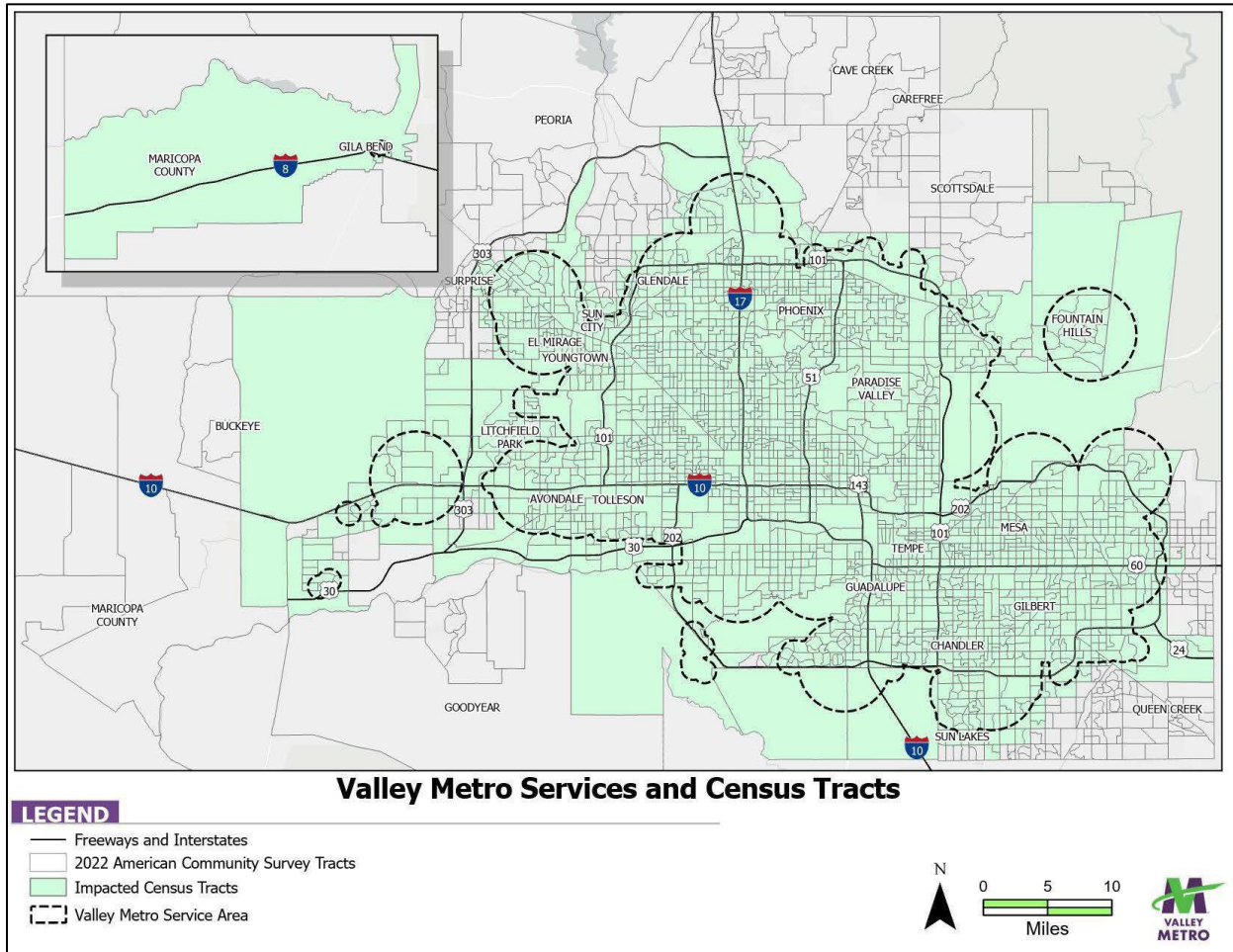


FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



The 2022 ACS data show 12 languages or language groups with 1,000 or more LEP persons. Only one LEP population exceeds both the 1,000 or more individuals and the five percent of the total population of persons eligible to be served or likely encountered. **Table 4** shows the populations that meet either of these thresholds using ACS 2022 population by language and ability, sorted by percentage of LEP population.

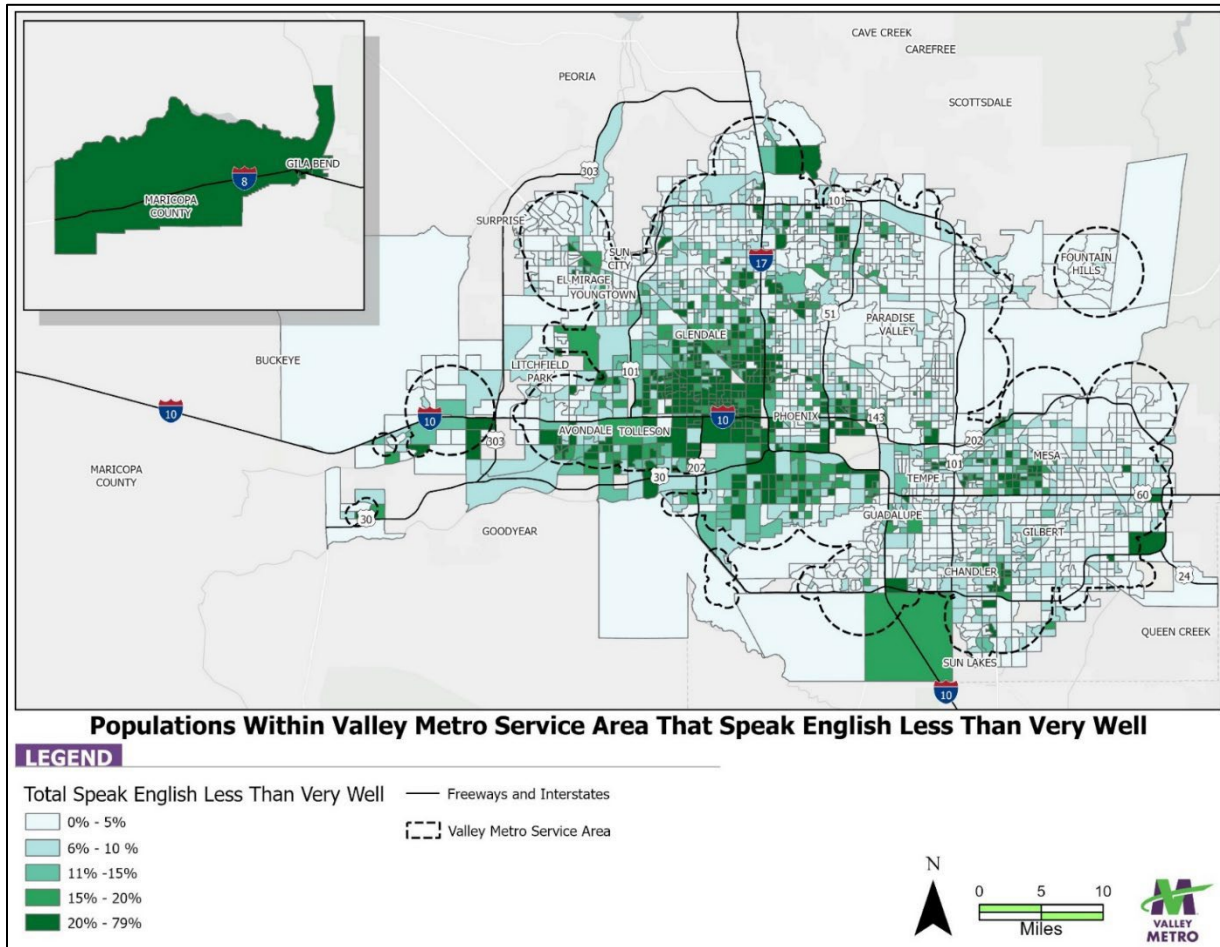
Within the service area, the majority of the 2022 LEP populations is the Spanish-speaking population; this is the only language group to exceed both 1,000 individuals and five percent of the LEP population. The Spanish LEP population consists of 251,606 individuals within the service area. The other Indo-European, Mandarin Chinese, and other and unspecified speaking populations followed with 3.90 percent, 3.06 percent and 2.76 percent respectively. The Vietnamese, other Asian and Pacific Island and Arabic speaking populations follow with 2.51 percent, 3.02 percent and 1.90 percent, respectively. This is followed by Russian and Filipino with 1.37 percent and 1.08 percent, respectively, and then by Korean (0.8 percent), French (0.7 percent) and German (0.2 percent).

TABLE 4: 2022 ACS DATA, BY LANGUAGE WITHIN ONE-HALF MILE OF FIXED-ROUTE SERVICE

Language	Speak English		Total Population	Percentage of Language LEP of Total LEP Population
	Less Than Very Well	Very Well		
All languages	319,427	—	—	100
Spanish	251,606	522,128	773,734	78.77
French, Haitian or Cajun	2,072	8,077	10,149	0.65
German	692	8,819	9,511	0.22
Russian, Polish or Other Slavic	4,370	12,051	16,421	1.37
Other Indo-European languages	12,462	36,475	48,937	3.90
Korean	2,425	2,995	5,420	0.76
Mandarin Chinese	9,785	11,285	21,070	3.06
Vietnamese	8,023	7,458	15,481	2.51
Filipino	3,463	10,932	14,395	1.08
Other Asian Pacific Island	9,648	22,228	31,876	3.02
Arabic	6,080	10,820	16,900	1.90
Other and unspecified languages	8,801	24,971	33,772	2.76

Figure 4 shows concentrations of populations speaking English less than very well throughout the service area. Most areas throughout the region are mixed, although there are a few pockets of Census blocks with concentrations of persons with limited English proficiency.

FIGURE 4: POPULATION SPEAKING ENGLISH “LESS THAN VERY WELL”



3.0 FREQUENCY OF CONTACT WITH LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 2)

The first step of the four-factor LEP needs assessment revealed that the largest language group is overwhelmingly Spanish, followed by the ACS language categories of other Indo-European, Mandarin Chinese and other and unspecified. Factor 2 is intended to assess the frequency with which LEP persons interact with Valley Metro programs, activities or services. The DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (2005) advises that:

Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed (emphasis added). The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.

The frequency of use was evaluated by assessing current resources, available data and a short survey of transit employees.

3.1 Evaluation Methods and Data Sources

To determine the frequency with which LEP persons interact with Valley Metro, both quantitative and qualitative methods were used to analyze access to services. Anecdotal information regarding interactions with LEP persons, garnered through conversations with Valley Metro employees, is also included in this section. More structured analysis is included using several sources of information:

- Transit employee surveys
- Customer Service Interactive Voice Response (IVR) call log
- Transit education program
- Valley Metro website translation data
- Together, these sources provide a picture of the interaction of LEP persons with programs, activities or services provided by the agency.

3.2 Frequency of Contact Analyses

Valley Metro recognizes the value of providing convenient and efficient information to transit riders. Understanding how often LEP persons are using services will assist in serving customers better in the future with quality services, programs and activities.

Customer Service Interactive Voice Response Call Log

The Customer Service Center updated its automated phone system in mid-2014 to establish the IVR feature. With this expansion, the system is able to provide a log listing the frequency with which line callers have requested to be transferred. Available are five topic categories, each in English and Spanish, for ten total options. The topics available include:

- Americans with Disabilities Act (ADA)
- Customer Relations (CR)
- Light Rail
- Lost and Found
- Transit Information (TI)
-

This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative, reducing the time it takes to be served in the preferred language. Currently, eight bilingual customer service representatives are employed by Valley Metro. The phone system prioritizes selection of Spanish calls received. **Table 5** shows the distribution of calls by option selected, followed by the sum of calls by language for calendar year 2022.

TABLE 5: 2022 CUSTOMER SERVICE CALL LOG

Call	Total Calls	% of Total Calls
ADA – English	328	0.38
ADA – Spanish	934	1.08
CR – English	8,522	9.89
CR – Spanish	135	0.15
Light Rail – English	8	0.01
Light Rail – Spanish	0	0.00
Lost and Found – English	259	0.30
Lost and Found – Spanish	0	0.00
TI – English	69,124	80.28
TI – Spanish	6,685	7.76
English (Total)	78,339	91.00
Spanish (Total)	7,754	9.09
Total Calls	86,095	100.00

FIGURE 5: CUSTOMER SERVICE CALLS BY LANGUAGE

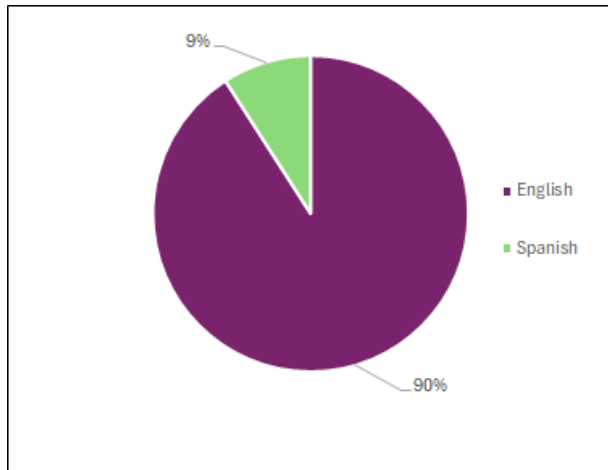


Figure 5 shows a pie chart of the calls by language. Approximately 90 percent of calls were for English and nine percent of calls were for Spanish. At the time of this report, 24 Customer Service representatives were on staff; of these, six were bilingual (25 percent). When evaluating the Customer Service call logs, the bulk of calls received are through the English phone lines, with a small portion (9 percent) selecting a Spanish option.

Transit Education Program

Valley Metro has a Transit Education program that presents information to various groups to teach about public transit, benefits of transit and how to use the system. Staff members visit schools, businesses, social service agencies and present to new residents and refugee groups, senior citizens and persons with disabilities. Additionally, transit information and assistance are provided at community or special events including environmental advocacy events, transportation or vehicle days, career days and more. This team also conducts general presentations by request to any group who wants to learn more about Valley Metro services.

The many Spanish-speaking passengers are accommodated because much of the transit information is available in Spanish. Additionally, a bilingual Valley Metro staff member will generally give the transit education presentation in Spanish upon request. Prior to the COVID-19 pandemic, the transit education staff would also conduct monthly

presentations with refugee resettlement groups. Given the varied backgrounds of refugee groups, the hosting organizations would generally provide the necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help bridge the language issues.

Website Translation

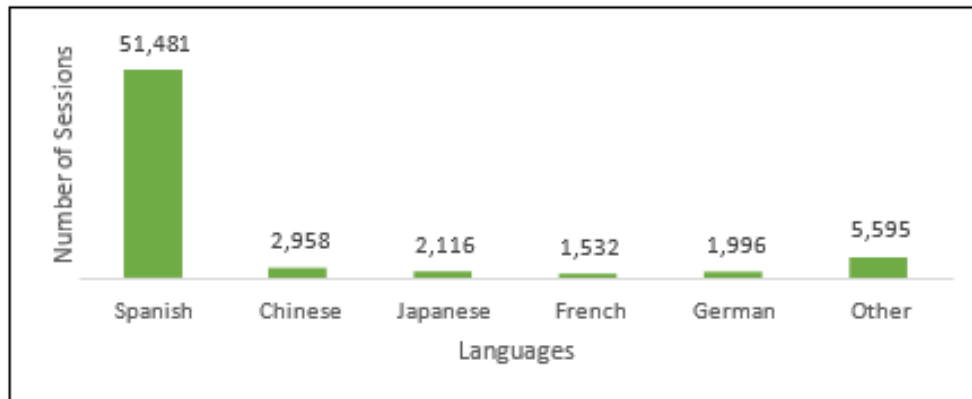
Apart from accessing information from transit employees—whether by phone, email, in person or another method—many customers use the www.valleymetro.org website for information. The website is equipped with the Google Translate feature, which allows translation into over 100 languages. As of 2024, users have translated the Valley Metro website into over 80 different languages using this feature. Approximately 99 percent of interactions with the Valley Metro website used the default English setting. Note only partial statistics are available for 2023 due to an error in the Google content management system responsible for collecting this data. In **Table 6**, the following data from 2022 offers a complete insight into the languages translated and the percentage of sessions in 2022. Note that only those languages accounting for at least 0.01 percent of the total sessions are included.

TABLE 6: 2022 WEBSITE SESSIONS, BY LANGUAGE

Language	Number of Sessions	Percentage of Total Sessions
English	2,792,742	97.59
Spanish	51,481	1.80
Chinese	2,958	0.07
Japanese	2,116	0.10
French	1,532	0.06
German	1,996	0.07
Korean	1,148	0.04
Portuguese	550	0.02
Russian	816	0.03
Dutch	406	0.01
Italian	429	0.01
Other	5,595	0.2

Once again, Spanish was overwhelmingly the most widely used language with the website translation service, accounting for 1.80 percent of sessions, followed by Chinese (0.10 percent), Japanese (0.07 percent), German (0.07 percent), Korean (0.04 percent), French (0.04 percent), Russian (0.03 percent), Portuguese (0.02 percent and Other (0.20 percent). **Figure 6** shows the number of translated sessions by language.

FIGURE 6: NUMBER OF TRANSLATED WEBSITE SESSIONS, BY LANGUAGE (EXCLUDING ENGLISH)



Historically, the website has been translated to over 80 other languages that collectively accounted for 0.2 percent of all sessions. These languages include:

- Afrikaans
- Arabic
- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Farsi
- Filipino
- Finnish
- Greek
- Hebrew
- Hindi
- Hungarian
- Indonesian
- Latin
- Norwegian
- Polish
- Romanian
- Samoan
- Serbian
- Slovak
- Slovenian
- Swedish
- Telugu
- Thai
- Tonga
- Ukrainian
- Vietnamese

Many documents on Valley Metro’s website are translated into Spanish since they are disseminated as paper materials to the public. Individuals may use these documents without translating the website into Spanish. Some of these documents include project updates, route maps and schedules, instructions and applications for a Reduced Fare ID, service change information, policies, brochures and forms.

Conclusion

The Factor 2 analysis revealed that there is regular contact between the LEP population and Valley Metro personnel. The Customer Service call log showed that nine percent of customers used one of the five Spanish options. Information from the Transit Education

team qualitatively identified Spanish as the main language group. Finally, translation data from the Valley Metro website indicated 2.4 percent of sessions were translated—most of which were translated to Spanish. Historically, the website has been translated to over 80 different languages. Overall, there is broad diversity in the Phoenix region population that accesses regional transit services; however, most people using the Valley Metro system speak English or Spanish.

4.0 NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY OR SERVICE PROVIDED (FACTOR 3)

The third step in the four-factor LEP needs assessment is an evaluation of the importance of Valley Metro services to persons with limited English proficiency. The first component of the Factor 3 analysis was to identify critical services. Next, input from community organizations was used to identify ways to improve these services for LEP populations. The DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (2005) advises that:

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 are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual . . . providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

With assistance from Valley Metro's Community Relations and Marketing departments, a list of services provided was prepared and prioritized. Input from community organizations and LEP persons was incorporated to ensure views of the importance of services provided are adequately prioritized.

4.1 Services Provided

In cooperation with Valley Metro's Communications and Operations departments, services currently provided to LEP persons were queried. All printed materials are translated into Spanish, and materials in both English and Spanish are available on both bus and light rail services. Below is a list of available materials and services in Spanish that includes bus- and light rail-specific services:

- Press releases
- Public materials including, but not limited to
 - Route Scout (announcements on buses and light rail)
 - Ride Guide and Destinations Guide
 - Service changes materials
 - Transit Book
 - Website
 - COVID-19 updates
 - Project updates

- Title VI forms
- Large special events materials (for example, Super Bowl public materials)
- Direct mailers or door hangers for targeted outreach
- Ticket vending machines (Spanish and Braille)
- Bilingual Customer Service staff
- Email list messages
- Bus-specific services:
 - Car cards (on-board advertisements)
 - Bus signage (priority seating, caution signs, entry/exit, etc.)
 - Variable message sign (VMS)⁶ that displays audio announcements on buses
- Light rail-specific services:
 - Light rail transit (LRT) vehicle signage, including priority seating, code of conduct, and other train information
 - VMS1 announcements on vehicles and at stations
 - System maps and auxiliary information
 - Operator call boxes on trains
 - Emergency call box at stations
 - Safe place notices

4.2 Critical Services

Public transit is a key means of mobility for persons with limited English proficiency. Of those services identified above, a subset of critical services was prioritized to ensure that those services imperative to use Valley Metro public transportation options are available to all users.

Basic trip information is available both printed and electronically in Spanish, including service hours, tickets, trip planning, airport and transit connections, parking, bicycles and services for persons with disabilities. Also available in Spanish is information regarding how to use transit, acceptable user conduct, priority seating, caution signs and exit locations on vehicles. Ticket vending is available in both Spanish and Braille. Many documents are available in Braille upon request. Emergency notification measures are also translated, including audio VMS announcements on vehicles (bus and rail), operator call boxes, emergency call boxes and safe place notices.

Bilingual Customer Service representatives are available during regular call center hours. Representatives use the same procedures for comments and note that the inquiry was in Spanish so that a bilingual representative is assigned in any follow-up response if needed. Outside of Customer Service hours, the website is available for translation to most languages at any time. For public meetings and hearings, a Spanish translator is usually available; additional translators are available upon request or in the appropriate context. Typically, additional translation services requested are provided for American Sign Language through an on-call contract.

¹ Variable message signs are audio announcements that occur on transit services to inform riders of relevant information and updates. Light rail stations and vehicles are equipped with VMS announcements; most fixed- route vehicles are also equipped with VMS capabilities.

5.0 CURRENT RESOURCES AVAILABLE AND THE COSTS TO PROVIDE LANGUAGE ASSISTANCE SERVICES (FACTOR 4)

The final step of the four-factor LEP analysis was an evaluation of the current and projected financial and personnel resources available to meet the current and future needs for language assistance. The first component of the Factor 4 analysis was to identify current language assistance measures and associated costs. The next step was to determine what additional services may be needed to provide meaningful access. The DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (2005) advises that:

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, 'reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

Valley Metro has a strong commitment to reducing the barriers encountered by LEP persons in accessing its services and benefits, to the extent resources are available. Valley Metro currently does not break down all cost expenditures related to providing language assistance; however, language assistance costs are evaluated on a triennial basis to include in Title VI reporting.

5.1 Current Measures and Costs

Costs incurred by Valley Metro for the language assistance measures currently being provided include:

- Translation of materials
- Printing, advertising or other marketing costs
- Interpretation services
- Staff costs associated with Title VI efforts in adhering to language assistance measures

Typically, an amount is embedded into the project costs by activity (logged under printing or other direct expenses) for translation and production of any materials. Agency-wide, there is an on-call contract for any interpretation needs. Any production costs are included in printing and public meetings budgets. Furthermore, bilingual employees provide intermittent language assistance needs as part of their other duties. The Valley Metro community outreach team hires with a preference towards bilingual speakers, especially for projects where LEP residents are prominent. Multiple employees in the community outreach team are fluent in Spanish. These employees may be assigned to prepare press releases or media events with Spanish-speaking publications in addition to their typical duties. These costs are not tracked, although most of the formal interpretation services are contracted.

Interpreters are contracted on a case-by-case basis for public meetings or hearings to ensure that any language assistance needs are met so that public relations staff can focus on facilitating the event. All hearings are staffed with interpreters while public meetings are staffed depending on the anticipated number of persons reached and upon request.

Valley Metro provides headsets to those wishing to hear the presentation in the translated language. To accommodate Spanish speakers, Valley Metro has held some events fully in Spanish, with an English translator. Those wishing to listen to the presentation in English used headphones and printed materials in English.

Valley Metro currently contracts for interpreters at public meetings. In FY24 the cost for language interpreter services at public meetings in total was \$20,545. Costs for translating and producing written materials such as meeting notices, display boards, news releases and project update sheets are also budgeted annually. In FY24 the cost for this service was \$25,502. The total for all translation services therefore in FY24 was \$48,853.

Additional costs include other staff time used on an ad hoc or regular basis to provide translation or interpretive services. Exactly 25 percent of Customer Service representatives are bilingual, assisting both Spanish- and English-speaking customers. Being bilingual is a preferred qualification when hiring Customer Service staff, although not required. Bilingual employees also may assist on an informal, ad hoc basis to communicate with LEP individuals in other departments.

5.2 Cost-effective Practices

Valley Metro will continue to evaluate ways to improve the cost-effectiveness and the quality of its language services. Additional strategies for saving costs or improving quality may include developing internal and external language services, with the opportunity to coordinate across multiple agencies in the region. Current measures to ensure services are cost-effective include:

- Bilingual staff trained to act as interpreters and translators
- Shared Customer Service center and other information for combined translation and interpretation resources
- Some standardized common documents with transit and other public agencies
- Using the free Google Translate service on the Valley Metro website
- Translated vital documents currently posted on www.valleymetro.org
- Strategies for consolidating the regional language assistance measures to achieve efficiencies may include:
 - Further development of a LEP information center for Valley Metro employees
 - Surveying Valley Metro staff to determine any additional existing multilingual resources
 - Conducting outreach to various community organizations to secure volunteers for translation and interpretation services that are currently contracted or completed in-house
 - Consolidating contract services for oral and written translation to secure the most cost-effective rates

Valley Metro continues to use qualified translators and interpreters to uphold the quality of language assistance measures. Valley Metro strives to provide basic informational training for volunteer staff on its language assistance measures.

5.3 Additional Services and Budget Analysis

Valley Metro is committed to reducing the barriers encountered by LEP persons in accessing its services to the extent funding is available. While Valley Metro currently does break down contracted cost expenditures related to providing language assistance, expenditures of efforts for translation and interpretation completed in-house are less well- documented. As part of the Language Assistance Plan, Valley Metro will better monitor efforts in the future. Valley Metro will further evaluate how to consolidate its language assistance measures to deliver the most cost-effective services.

The information received from community organizations provided some insight on additional services that may ease access for LEP persons to regional transit services. Services requested were centered on service expansions that included increased frequencies and later services at night. However, these would be improvements for consideration and prioritization of the system rather than specific services for LEP persons. Therefore, they were excluded here and assigned to the general public process for service requests.

Other requests included using more symbols to depict messaging and system routes. Audio messaging using VMS could potentially show messaging in another language as well. The light rail system VMS currently shows messages in English and Spanish. Bus messaging is typically location data and in close proximity, depending on stop locations. Some audio messages on buses are announced in Spanish. The feasibility and helpfulness of VMS translation should be evaluated.

As applicable and through the annual budget process, additional services requested or identified may be considered for implementation. In 2015, Valley Metro shifted to a zero-based budget that is approved by two boards of directors: Valley Metro Rail Board and the Valley Metro RPTA Board. The budgets are developed and approved annually as appropriate to the unique needs and demands of each agency at that point in time.

5.4 Projected Costs

With a commitment to providing reasonable language assistance measures, Valley Metro would assess current symbols used on vehicles, at station locations and elsewhere to determine the sort of improvements that could be made so that the system is more easily understood visually. Biannually, in coordination with the service changes, updated system maps are produced.

Other improvements would be considered after analyzing the staff costs, third-party contract costs and costs related to volunteer or community organization coordination. These would be evaluated in comparison with anticipated benefits to the LEP population. Other considerations may include operational issues and implementation time.

6.0 LANGUAGE ASSISTANCE MEASURES

Valley Metro is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access and reduce barriers to services and benefits for persons with limited English proficiency.

6.1 Current Language Assistance Measures

Spanish Language Assistance

As discussed earlier, Valley Metro currently provides both oral and written language assistance in Spanish. Oral language assistance includes bilingual customer service representatives, speaking Spanish. Additionally, Spanish interpreters are available at public meetings. On vehicles and at stations, VMS announcements are provided in Spanish.

Written Spanish language assistance includes signs, press releases, list serve messages, service change materials, Title VI complaint forms, policies and procedures. Additional translation of some vital documents is provided, such as schedules, maps, Ride and Destination Guides, route scouts and more. Meeting notices and public input surveys at public meetings are translated.

Notices to the public of language assistance measures are typically provided side-by-side with an English version of the document. For example, Ride Guide documents are provided in both English and Spanish and are available together wherever disseminated. Where available, documents are printed on both sides with an English version and a Spanish version on each side of the paper. When calling into the Customer Service line, the interactive voice response system will automatically ask if Spanish is the preferred language prior to being connected with a representative.

Languages Other Than Spanish

Valley Metro provides oral and written translations into other languages when applicable. For written translations, the Valley Metro website is equipped with the Google Translate feature, which allows translation into over 100 languages. For oral translations, the agency uses an existing contract that can provide translations into all languages identified in the Language Assistance Plan, as well as American Sign Language. Translators under this contract are used for public meetings, canvassing and other community outreach as needed. Valley Metro also provides sign language interpreters for public meetings when requested, and provides Braille translations on fare vending machines and for printed documents upon request.

As the region grows and diversifies the agency will translate vital documents into languages other than English and Spanish as practicable for language populations over 1,000 that speak English less than very well. These vital documents include:

- Title VI Notice to the Public
- Title VI complaint forms
- Title VI procedures
- Notices to public
- Service and Fare Changes
- Bus and Rail Schedules

These items are currently translated into Spanish as well as English. The agency will continue to monitor the demographics of the region as these printed offerings are expanded to meet federal requirements.

6.2 Staff Training

Specific policies and procedures for interacting with LEP persons are not formally adopted on a stand-alone basis. These policies and procedures are, in essence, for all customers and have been embedded into multiple documents (including the Title VI Plan, trainings, instructions, etc.).

Using the Customer Service Center as an example, Spanish calls are assigned directly to a Spanish-speaking representative through the phone system. In the CAS, a note is made that the customer speaks Spanish so that if Customer Service cannot respond to the query immediately, any future response is assigned to a bilingual representative. This training is integrated into general customer assistance staff training to ensure cost-effective practices and efficient use of training resources. Title VI is distributed to new Customer Service employees and, where applicable, employees are expected to know how to file discrimination claims based on race, color or national origin. Additionally, there are related trainings available including quarterly Civil Rights Workshops, training sessions for conducting complaint investigations according to federal guidelines and streamlining the complaint investigative process.

Training for employees who regularly encounter the public may also include:

- Type of language services available
- How staff and/or LEP customers can obtain these services
- How to respond to LEP callers
- How to respond to correspondence from LEP customers
- How to respond to LEP customers in person
- How to document LEP needs

Valley Metro continues to consider opportunities to provide quality services for LEP persons throughout the service area.

6.3 Future Language Assistance Services

With the development of subsequent Language Assistance Plans, the monitoring, evaluation and update process would identify additional services to be considered for feasibility of implementation. Valley Metro strives to serve LEP populations adequately with an equal opportunity to use transportation options available. Section 7 provides more information about the plan's monitoring and update process.

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

Triennially, Valley Metro will review, monitor and update the language assistance plan. Feedback from agency staff and community members will be accepted throughout the year at the email address: TitleVICoordinator@ValleyMetro.org. Additional community feedback may be elicited during the update process. Internal monitoring will be conducted using the template provided from the FTA handbook Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP)

Persons (2007). Using this checklist, stations, vehicles, Customer Service, community outreach and public relations are periodically monitored.

Using this information, changes may be made to the language assistance plan recognizing any cost implications and resources available. Depending on cost and resource evaluation, language assistance measures may be expanded, modified or eliminated based on their effectiveness.

As the transit service area is modified through service changes, the demographics served will be reviewed to ensure that those areas with high concentrations of LEP persons are reflected accurately in an effort to provide language assistance measures to areas with expanded transit services.

Throughout the monitoring period, Valley Metro will continue to follow the recommendations and use the resources provided by Executive Order 13166, FTA Circular 4702.1B, the DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (2005), and the FTA handbook Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (2007). Valley Metro will be better able to apply the DOT LEP guidance's four-factor framework and will continue to determine an appropriate mix of language assistance in the preparation of language assistance implementation plans.

Non-Elected Committees Membership Table

A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population					

The City of El Mirage does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

The City of El Mirage does NOT monitor subrecipients for Title VI compliance.

The City of El Mirage does NOT currently have subrecipients and, therefore, does NOT monitor subrecipients for Title VI compliance. In the event subrecipients come under the control of the City of El Mirage, the city will adopt and implement a policy that ensures all subrecipients comply with their obligations under Title VI and any other applicable federal and state laws, regulations, and rules.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

The City of El Mirage has no current or anticipated plans to develop new transit facilities covered by these requirements.

Regional System-Wide Standards and Policies

The City of El Mirage does not operate its own transit system. Transit services in El Mirage are operated by Valley Metro, in accordance with their Regional System-Wide Service Standards and Policies. Transit services provided locally are not federally funded.

Distribution of Transit Amenities

Although Valley Metro provides transit services, transit amenities for bus services are locally funded and fall under the responsibility of the jurisdictions within which they are sited. Transit amenities refer to items such as seating, bus shelters, provisions of information, waste receptacles, etc.

The City of El Mirage provides the following transit amenities at all four bus stops located within its boundaries:

- Bus shelter with gabion basket column
- Two six-foot benches
- Waste receptacle
- Three bike racks
- Porous aggregate pavement
- Concrete pavers
- Steel screen fencing

Service and Fare Policy Changes

The City of El Mirage follows Valley Metro's policy for all service and fare changes.

Board Approval for the Title VI Program

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE