
Title VI Implementation Plan



January 2022

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Title VI Policy Statement

The City of Glendale Transit 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 Glendale Transit sponsored program or activity. There is no distinction between the sources of funding.

City of Glendale Transit also assures 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, City of Glendale Transit will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

As a sub-recipient of Federal-aid funds from another entity/person, City of Glendale Transit will ensure full compliance with Title VI Nondiscrimination Program requirements. Glendale Transit will oversee and implement FTA Title VI requirements.

Kevin R. Phelps, City Manager

ATTEST:

Julie K. Bower, City Clerk (seal)

APPROVED AS TO FORM:

Michael D. Bailey, City Attorney

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI City of Glendale Transit

The City of Glendale Transit 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 Glendale's transit services contractor, Valley Metro Customer Service Care center.

For more information on the City of Glendale's civil rights program, and the procedures to file a complaint, contact 602-253-5000, (TTY 602-251-2039); email csr@valleymetro.org; or visit the administrative office at 4600 E. Washington St., Suite 101, Phoenix, AZ 85034. For more information, visit www.ValleyMetro.org.

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 Valley Metro at 602-253-5000. Para información en Español llame: Title VI Program Coordinator, City of Phoenix, 602-534-3026 or Christina.Hernandez@phoenix.gov.

The above notice is posted in the following locations: City of Glendale Transit, 6210 W. Myrtle Ave., Building S., Glendale, AZ 85301 and on City of Glendale Transit buses.

This notice is posted online at www.GlendaleAZ.com/Transit

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI La Ciudad de Glendale

La Ciudad de Glendale (*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 Glendale's programa de derechos civiles, y los procedimientos para presentar una queja, contacte 602-253-5000, (TTY 602-251-2039); o visite nuestra oficina administrativa en 4600 E. Washington St., Suite 101, Phoenix, AZ 85034. Para obtener más información, visite www.ValleyMetro.org.

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 Glendale Transit, 6210 W. Myrtle Ave., Building S., Glendale, AZ 85301 and on City of Glendale Transit buses.

This notice is posted online at www.GlendaleAZ.com/Transit

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 Complaint

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.

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.

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, o solucionada; no es determinable

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

Rastreando 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 no 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) o 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

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

The City of Glendale Transit will investigate any Title VI complaints, investigations, or lawsuits related to Glendale Urban Shuttle (GUS Bus Routes 1, 2 & 3) and Glendale Dial-A-Ride.

The City of Phoenix operates the City of Glendale’s fixed route local service and Valley Metro operates the City of Glendale’s express service and Regional Dial-A-Ride. See route profile below.

ROUTES UNDER CONTRACT WITH THE CITY OF PHOENIX		ROUTES UNDER CONTRACT WITH VALLEY METRO
Route 51 – 51 st Ave.	Route 83 – 83 rd Ave.	Express 573 – West Glendale
Route 59 – 59 th Ave.	Route 90 – Olive/Dunlap	Express 575 – North Glendale
Route 60 – Bethany Home	Route 106 – Peoria Ave.	Grand Avenue Limited (GAL)
Route 67 – 67 th Ave.	Route 138 - Thunderbird	
Route 70 – Glendale Ave.	Route 170 – Bell Road	
Route 80 – Northern Ave.	Route 186 – Union Hills	

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

City of Glendale Transit has not had any Title VI complaints, investigations, or lawsuits in 2018-2021.

*City of Glendale Transit
Public Participation
Plan*



City of Glendale Transit is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

City of Glendale Transit has adopted Valley Metro’s Title VI Public Participation Plan. (**Attachment “A”**)

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.

City of Glendale Transit submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

City of Glendale Transit

Limited English Proficiency Plan



City of Glendale Transit has adopted Valley Metro's Limited English Proficiency Plan (LEP) (**Attachment "B"**) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of Glendale Transit 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 Glendale Transit's extent of obligation to provide LEP services, the City of Glendale Transit 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 Glendale Transit service area who may be served or likely to encounter by City of Glendale Transit program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with any City of Glendale Transit services;
- 3) The nature and importance of the program, activities or services provided by the City of Glendale Transit to the LEP population; and
- 4) The resources available to City of Glendale Transit 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. All public outreach notices will include the statement indicating that LEP individuals may contact Valley Metro at 602-253-5000, (TTY 602-251-2039); email csr@valleymetro.org or visit the administrative office at 4600 E. Washington St., Suite 101, Phoenix, AZ 85034 to receive the information in an alternate language.

Safe Harbor Provision

City of Glendale Transit 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 Hearings

Non-elected Committees Membership Table

A sub recipient 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	African American	Native American	Asian American	Other	Multi-Racial
Population	51%	8%	2%	5%	18%	16%
Citizens Transportation Oversight Commission (CTOC)	100%	0%	0%	0%	0%	0%

The Glendale City Council appoints Boards and Commission members to serve on the Citizens Transportation Oversight Commission (CTOC). The CTOC consists of 11 members who are Glendale residents: 6 are appointed by each Councilmember and 1 is a Mayoral appointee. The remaining 4 are appointed at large by any member of the Glendale City Council. A three-hour basic training program is required for those who have expressed a desire to serve and who have completed an application. Once training is completed, their application is considered as vacancies occur.

The City of Glendale will continue to make every effort to encourage participation of minorities on CTOC through increased outreach by advertising vacant positions in media outlets that reach the minority population.

Additionally, the City Charter requires that redistricting be done at least every ten years following the U.S. Census. Any changes to voting districts are required to be approved by the United States Department of Justice.

Monitoring for Subrecipient Title VI Compliance

City of Glendale Transit does not have nor monitor subrecipients.

Title VI Equity Analysis

A sub recipient 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 sub recipient organization receives any FTA dollars, it must comply with this requirement.

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

Regional System Wide Standards and Policies

Fixed route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators:

1) Vehicle Load for Each Mode

1.1 Vehicle Load Standard

Vehicle load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. The City of Glendale directly operates 3 circulator routes contracting out other fixed routes with the City of Phoenix and Valley Metro.

The load thresholds are identified below:

Two different configurations are used;

On Route 1 the buses can seat up to 33 passengers and hold comfortably 47 passengers with an expressed ratio of 1.42. This means that all seats are filled and there are 14 standees.

On Routes 2 and 3 the buses can seat up to 19 passengers and hold comfortably 27 passengers with an expressed ratio of 1.42. This means that all seats are filled and there are 8 standees.

1.2 Vehicle Load Data Collection

To determine the vehicle load the following data is gathered:

- Annual random ride check samples or APC data
- Each ride check is one trip on a route
- AM Peak direction samples Monday through Friday
- PM Peak direction samples Monday through Friday
- Samples collected annually throughout the year

1.3 Vehicle Load Assessment

Using the data above the following analysis is done to determine the vehicle load:

Community Circulator Service

- Determine number of minority and non-minority routes that have a max load ratio of less than 1.0 for AM and PM Non-Peak times – calculate percentage
- Determine number of minority and non-minority routes that have a max load ratio of less than 1.40 for AM and PM Peak times – calculate percentage
- Repeat the calculations for low-income and non-low-income routes

- Compare level of service between minority and non-minority routes and low income and non-low-income routes

2) Vehicle Headway for Each Mode

Vehicle headway standards are based on the Transit Standards and Performance Measures (TSPM) for regionally funded routes. Transit service standards and performance measures represent rules and guidelines by which the performance of the region’s transit system may be evaluated, and decisions regarding transit investments may be prioritized and measured.

2.1 Vehicle Headway Standard

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. The following are the vehicle headway standards for the City of Glendale’s Circulators

Service Type	Minimum Headway or Daily Trips	Minimum Span Week / Sat / Sun	Minimum
Circulator 1	30 min	11 hrs. / 11 hrs. / 10 hrs.	Mon - Sun
Circulator 2	45 min	9 hrs. / 0 / 0	Mon – Fri
Circulator 3	60 min	9 hrs. / 0 / 0	Mon - Fri

3) On Time Performance for Each Mode

3.1 On Time Performance Standard

On time performance is a measure of bus runs for a particular route completed as scheduled. The service standard threshold is defined as 90% or better of all trips on a particular route completed within the allowed on-time window (no more than 0 minutes early and 5 minutes 59 seconds late, compared to scheduled arrival/departure times as published time points).

3.2 On Time Performance Data Collection

Measure standard using Valley Metro operated local fixed routes.

4) Service Availability for Each Mode

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service availability and service availability assessments will be the responsibility of the individual municipalities.

4.1 Service Availability Standard

Service availability is measured by the distribution of bus stops within the regional service area that affords residents accessibility to transit. The service standard is consistent with the TSPM standard and has the following thresholds for each service.

Community Circulator Service

- Bus stops within the designated stop area of each circulator route are placed no more than one-quarter mile apart

4.2 Service Availability Data collection

- Bus stop database

Effective qualitative practices to fulfill the Service Policy requirements include developing written policies covering each of the following service indicators:

1) Transit amenities for each mode

Bus stop furniture such as bus shelters, benches and trash receptacles are placed at high ridership areas. Ridership is determined by the number of passengers boarding and de-boarding at bus stops along the route.

2) Vehicle assignments for each mode

Vehicle assignments are determined by the amount of ridership per run. Per run indicates the number of passengers boarding the circulator within one complete trip. Starting at point "A" completing one circuit, returning to point "A".

Regional System-wide Service Standards and Policies (Attachment "C")

Service and Fare Policy Changes

For all Service and Fare changes, the city of Glendale follows Valley Metro's regional process.

There have been no Service or Fare changes in Glendale since the last Title VI update.

Board Approval for the Title VI Program

RESOLUTION NO.

A RESOLUTION OF THE COUNCIL OF THE CITY OF
GLENDALE, MARICOPA COUNTY, ARIZONA, APPROVING
THE GLENDALE TRANSIT TITLE VI IMPLEMENTATION
PLAN.

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF GLENDALE as follows:

SECTION 1. That the Glendale Transit Title VI Implementation Plan is hereby approved and is incorporated herein by this reference. Three copies of the Glendale Transit Title VI Implementation Plan are on file in the office of the City Clerk of the City of Glendale.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Glendale, Maricopa County, Arizona, this day of , 2022.

Mayor Jerry P. Weiers

ATTEST:

Julie K. Bower, City Clerk (SEAL)

APPROVED AS TO FORM:

Michael D. Bailey, City Attorney

REVIEWED BY:

Kevin R. Phelps, City Manager
transportation_transit title VI plan.doc

Title VI Attachment “A”

Public Participation Plan



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.

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

- 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.

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.



Title VI Attachment “B”

Limited English Proficiency Plan



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 64 million riders annually. Valley Metro provides fixed route bus service, light rail service, streetcar service (open in late 2021) and complementary ADA 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, 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, and Valley Metro, Scottsdale and Glendale. There is a total of 893 fixed-route vehicles and 50 light rail vehicles operating in the region. Of these vehicles, 95 are circulators.

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 20 Express/RAPID routes, 21 community circulator routes, 1 rural connector route and 1 light rail system. Valley Metro customers made over 64,000,000 boardings during fiscal year 2019.

Seven Four regional 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 1,134,014.

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.

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.

1.1 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.

1.2 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, 2019 American Community Survey (ACS) 5-year Sample. The 2019 ACS data were used because the 2020 decennial census, at the time of this update, was not available.

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 American Community Survey (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 2019 ACS 5-year data (2015 to 2019).

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. 8.7 percent of residents in Maricopa County speak English less than “very well”, while 9.6 percent of residents within Valley Metro’s service area speak English less than “very well”.

FIGURE 1: VALLEY METRO SERVICE AREA

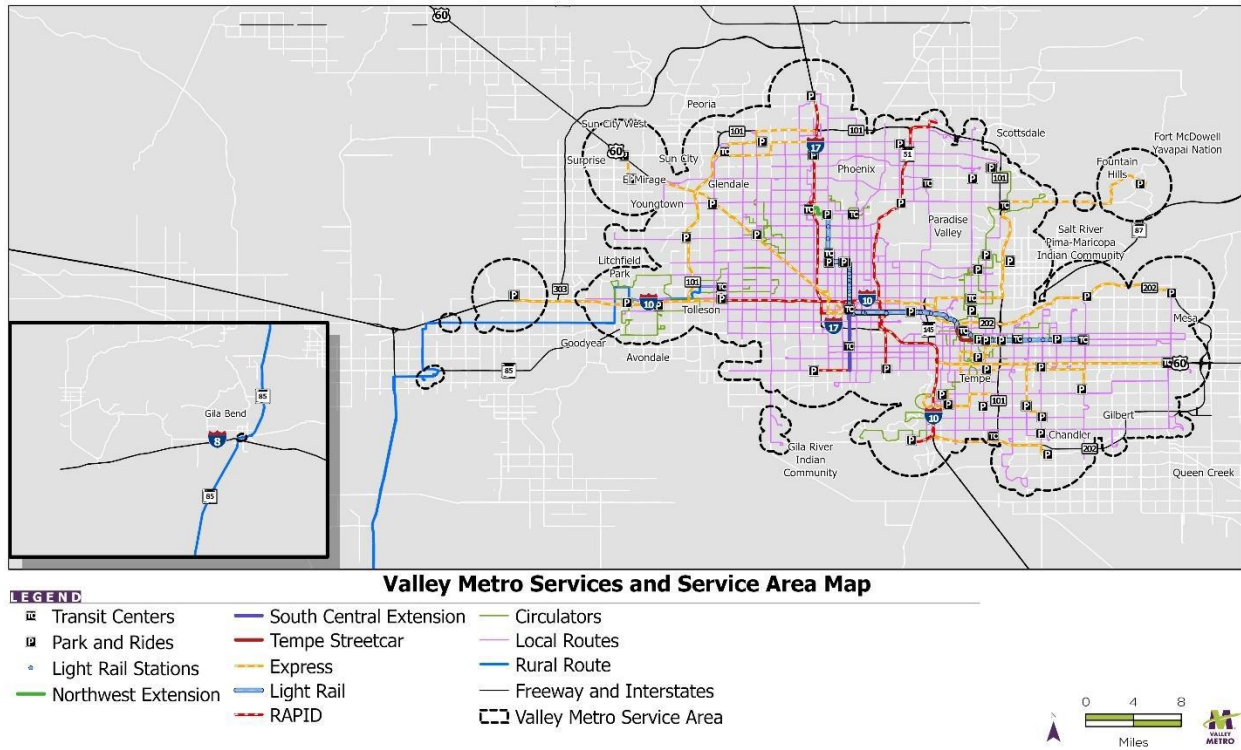


TABLE 1: 2019 ACS DATA, BY LOCATION

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	4,050,301	2,957,214	737,917	355,170	8.7
Census Tracts within service area ^a	3,530,687	2,501,110	690,264	339,349	9.6

^a Service Area is defined as a ¼ -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 2019 ACS data show the population self-identified as speaking English less than “very well” was predominantly the Spanish language group, encompassing 261,287 people, or 7.4 percent of the total population age five years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups account for 78,026 people, or 2.2 percent of the population. Of all those speaking English less than “very well”, the Spanish group makes up 77 percent of the total population over age five with limited English proficiency.

TABLE 2: 2019 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	3,530,687	690,264	148,748	119,838	70,727	9.6
English	2,501,110	—	—	—	—	0.0
Spanish	788,929	527,642	100,211	97,690	63,386	7.4
Asian or Pacific Islander	95,307	57,621	22,331	11,922	3,433	1.1
Indo-European	88,411	66,861	14,813	4,981	1,756	0.6
All other languages	56,930	38,140	11,393	5,245	2,152	0.5

The 2019 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 2019). In total, the 2019 ACS data identified 1,356,898 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.

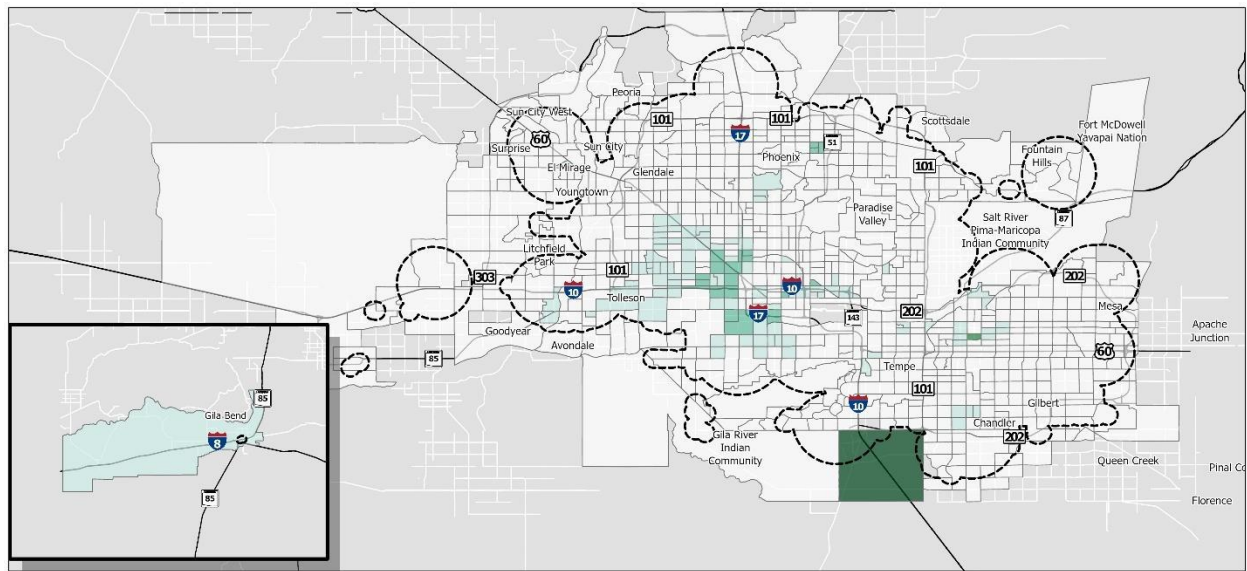
TABLE 3: 2019 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census tracts in service area	1,356,898	57,919	330,557	4.3
English	968,422	—	—	—
Spanish	276,605	41,125	235,480	3.0
Asian or Pacific Islander	41,622	7,956	33,666	0.6
Indo-European	46,362	4,648	41,714	0.3
All other languages	23,887	4,190	19,697	0.3

Within the transit service area, 4.2 percent of households are considered linguistically isolated. Again, these are predominantly Spanish households, making up three percent of the total. Remaining languages make up 1.2 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 2: CENSUS TRACTS WITH LINGUISTICALLY ISOLATED HOUSEHOLDS



Census Tracts Within Valley Metro Service Area With Linguistically Isolated Households

- LEGEND**
- Percent of Isolated Households
 - 0% - 10%
 - 11% - 20%
 - 21% - 30%
 - 31% - 40%
 - 41% - 50%
 - Freeway and Interstates
 - - - Valley Metro Service Area

Source: 2019 American Community Survey

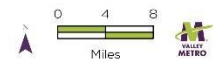
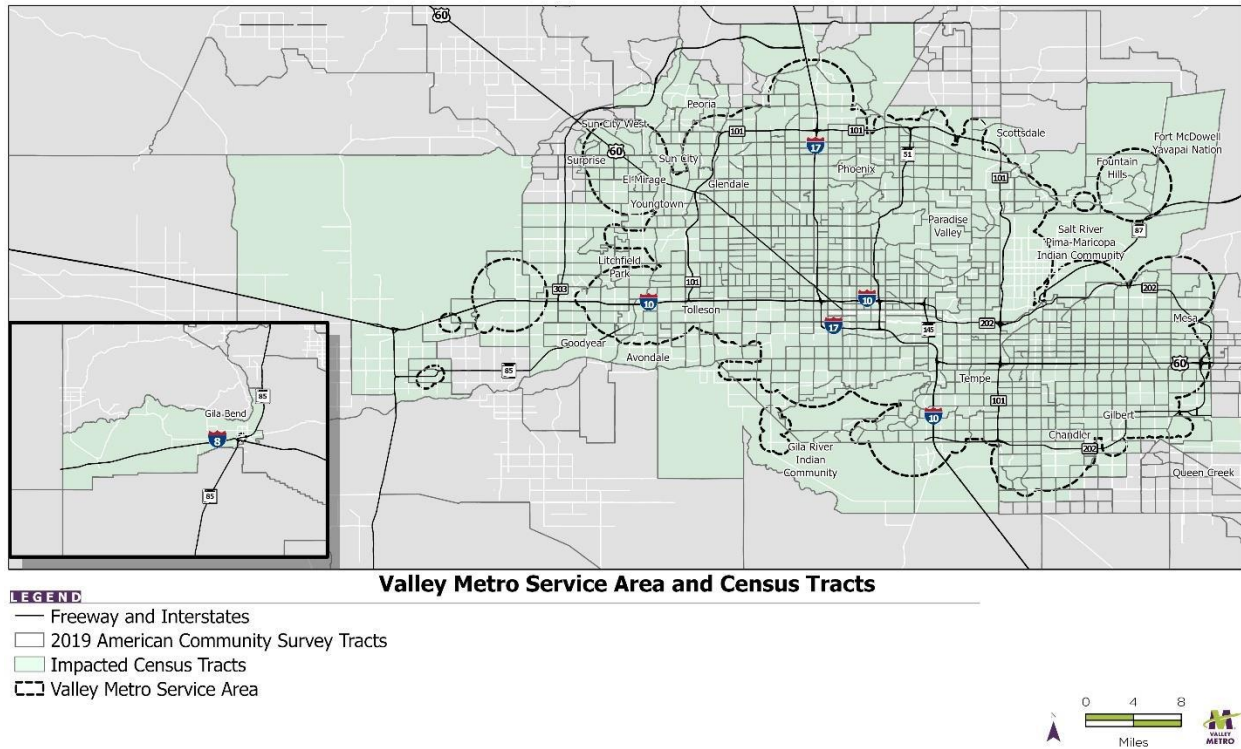


Figure 3 shows the ACS 2019 census tracts within the three-quarter mile buffer of local fixed route service and a three-mile buffer around park-and-ride and transit facilities for express bus service. Census tracts encapsulated within this area are included in the estimates, although they may not be within one-quarter mile of a fixed route.

FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



The 2019 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 2019 population by language and ability, sorted by percentage of LEP population.

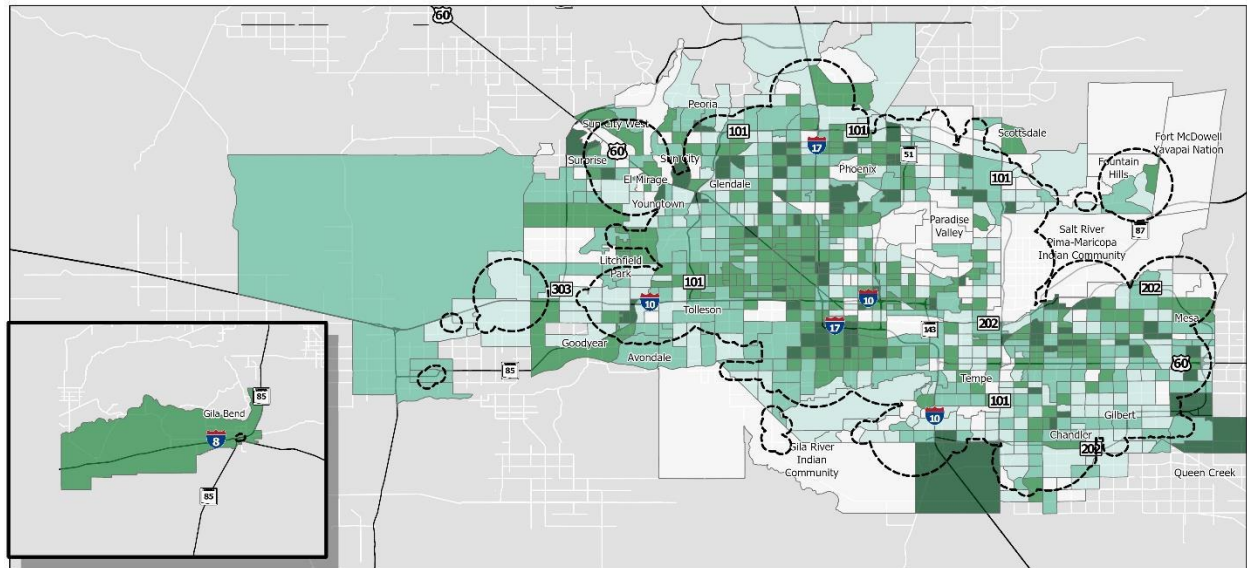
Within the service area, the majority of the 2019 LEP populations is the Spanish speaking population; this is the only language group to exceed both 1,000 individuals and five percent of the LEP population. The Spanish LEP population consists of 261,287 individuals within the service area. The Other Indo-European, Mandarin Chinese, and Other and Unspecified speaking populations followed with 3.86 percent, 3.42 percent, and 3.33 percent respectively. The Vietnamese, Other Asian and Pacific Island and Arabic speaking populations follow with 2.87 percent, 2.85 percent and 2.27 percent, respectively. This is followed by Russian and Filipino with 1.63 percent and 1.28 percent, respectively, and then by Korean (0.8 percent), French (0.6 percent) and German (0.3 percent).

TABLE 4: 2019 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	335,714	—	—	100
Spanish	261,287	527,642	788,929	77.83
French, Haitian or Cajun	2,115	7,666	9,781	0.63
German	988	9,765	10,753	0.29
Russian, Polish or Other Slavic	5,484	12,517	18,001	1.63
Other Indo-European languages	12,963	36,913	49,876	3.86
Korean	2,694	2,856	5,550	0.80
Mandarin Chinese	11,471	11,965	23,436	3.42
Vietnamese	9,649	6,936	16,585	2.87
Filipino	4,292	12,356	16,648	1.28
Other Asian Pacific Island	9,580	23,508	33,088	2.85
Arabic	7,623	11,563	19,186	2.27
Other and unspecified languages	11,167	26,577	37,744	3.33

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”



LEGEND

Total Speak English Less Than Very Well — Freeway and Interstates
 □ Valley Metro Service Area

- 0% - 16%
- 17% - 26%
- 27% - 34%
- 35% - 44%
- 45% - 68%

Source: 2019 American Community Survey

0 4 8
Miles

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 USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (DOT 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.

Transit Employee Surveys

During September and October of 2020, a voluntary survey of customer service and transit employees was conducted regarding interaction with LEP persons and languages spoken. A copy of the survey instrument can be found in **Appendix A**. Valley Metro Customer Service Representatives provide passenger assistance most commonly through email, but also by phone. Several Customer Service Representatives that are stationed at transit passenger facilities¹ to provide assistance to passengers. Bus operators at multiple locations were also surveyed. Employees surveyed were based at one of the following locations:

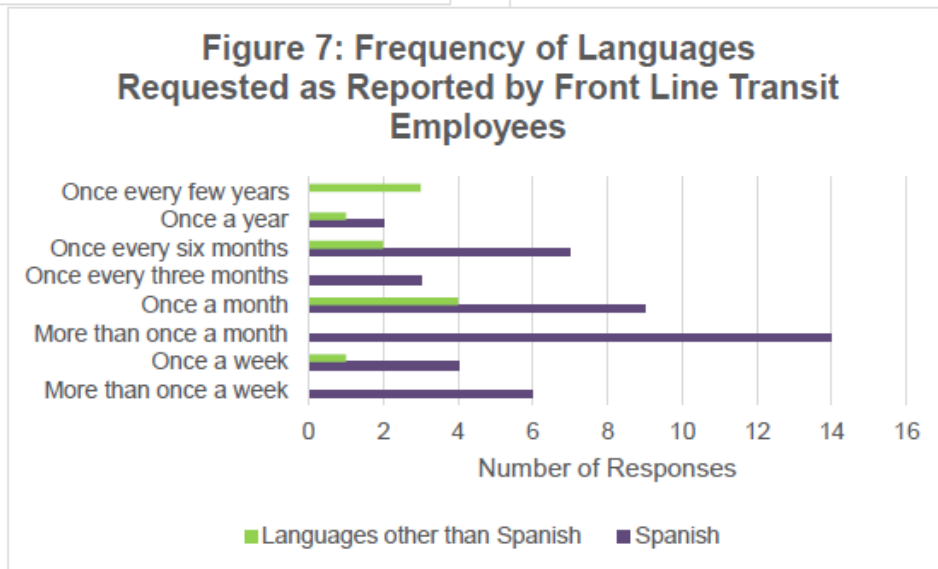
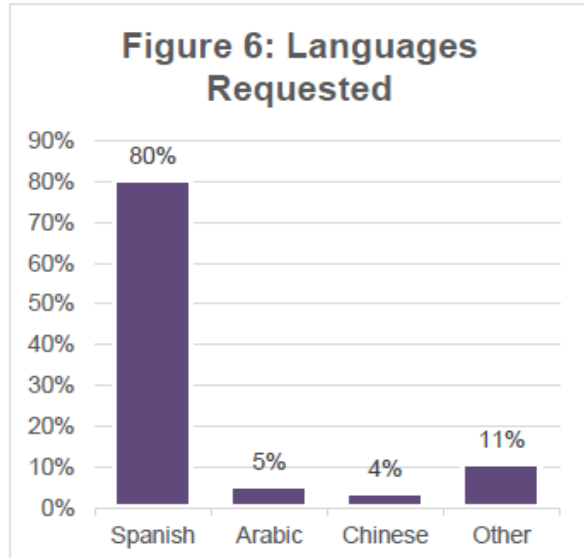
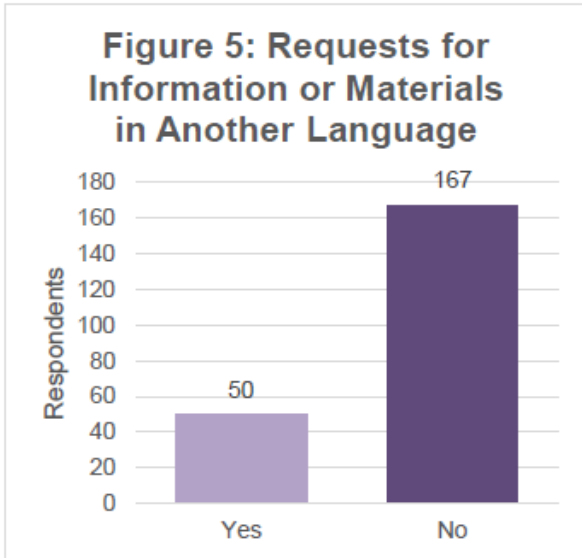
- Customer Service and Mobility Center
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center
- East Valley Bus Operations and Maintenance Facility
- Mesa Bus Operations and Maintenance Facility
- Phoenix Bus Operations and Maintenance Facility

In total, 218 respondents provided information about their experiences. Approximately 80 percent of those surveyed were transit operators. When asked if staff have had any requests for materials in another language in the past two years, 23 percent responded yes; see **Figure 5**. Of these, most interpretation or translation requests were for Spanish. All but two of the locations received translation requests in the past two years: Sunnyslope Transit Center and Metrocenter Transit Center.

Languages requested were predominantly Spanish (80 percent) followed by Arabic (5 percent) and Chinese (4 percent). Other languages made up 11 percent of requests. These languages, which were each requested only once, were French, Russian, German, Farsi, Hindi and Swahili. See **Figure 6** for a graphic representation of the languages requested.

These responses were categorized appropriately and cross-referenced with the language requested. See **Figure 7** for a comparison. Spanish was much more frequently requested than any other language, and languages other than Spanish were requested at a substantially less frequent rate.

¹ Facilities operated by the City of Phoenix or City of Tempe



This survey helped support the finding that multiple languages are encountered by transit professionals, yet Spanish is the most common and most frequent of the languages encountered.

Customer Service Interactive Voice Response Call Log

The Customer Service Center updated its automated phone system in mid-2014 to establish the Interactive Voice Response (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)

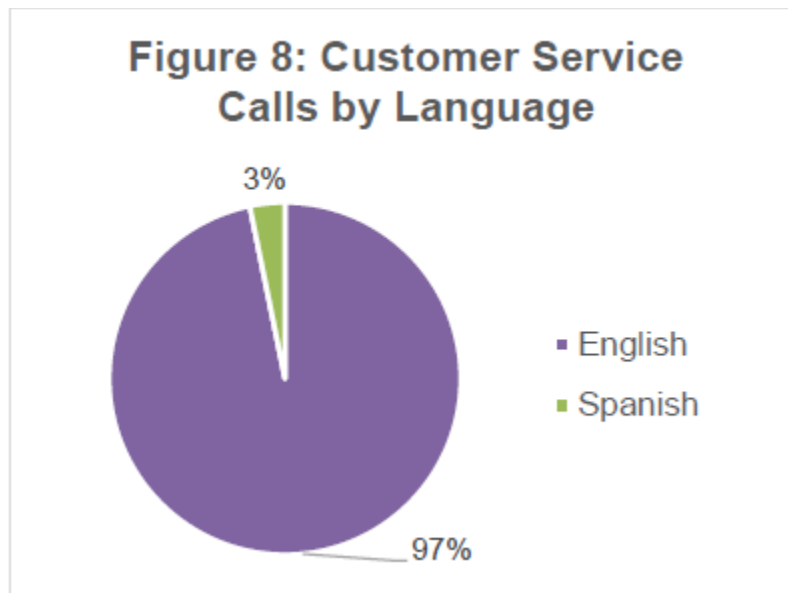
This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative, reducing the time it takes to be served in the preferred language. Currently, eight bilingual customer service representatives are employed by Valley Metro. The phone system prioritizes selection of Spanish calls received. **Table 7** shows the distribution of calls by option selected, followed by the sum of calls by language for calendar year 2019.

TABLE 7: 2019 CUSTOMER SERVICE CALL LOG

Call	Total Calls	% of Total Calls
ADA – English	20,672	1.79%
ADA – Spanish	2,457	0.21%
CR – English	166,893	14.45%
CR – Spanish	1,030	0.09%
Light Rail – English	113	0.01%
Light Rail – Spanish	2	0.00%
Lost and Found – English	16,419	1.42%
Lost and Found – Spanish	198	0.02%
TI – English	913,931	79.12%
TI – Spanish	33,462	2.90%
English (Total)	1,118,028	96.78%
Spanish (Total)	37,149	3.22%
Total Calls	1,155,177	100.00%

Figure 8 shows a pie chart of the calls by language. Approximately 97 percent of calls were for English and three percent of calls were for Spanish. At the time of this report, 38 customer service representatives were on staff; of these, 8 were bilingual (21 percent).

When evaluating the customer service call logs, the bulk of calls received are through the English phone lines with a small portion (3 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. In 2019, the transit education staff made 427 public presentations, two of which were in Spanish.

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 necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help bridge the language issues.

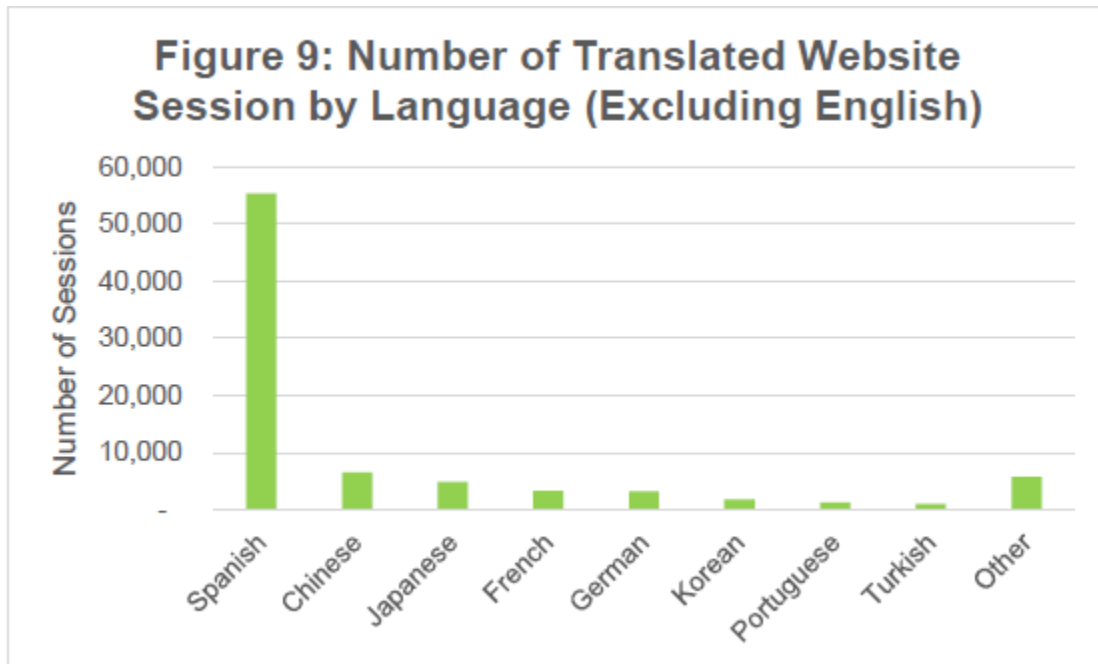
Website Translation

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 52 languages. Users have translated the Valley Metro website into 43 different languages using this feature. Approximately 99 percent of interactions with the Valley Metro website used the default English setting. The remaining 1 percent used the other languages. **Table 8** lists the languages translated and the percentage of sessions in 2019. Note that only those languages accounting for at least 0.01 percent of the total sessions are included; a full table of entries is available in **Appendix B**.

TABLE 8: 2019 WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percentage of Total Sessions
English	5,659,734	98.56
Spanish	55,257	0.96
Chinese	6,506	0.11
Japanese	4,837	0.08
French	3,293	0.06
German	3,167	0.06
Korean	1,750	0.03
Portuguese	1,297	0.02
Russian	898	0.02
Turkish	1,028	0.02
Arabic	557	0.01
Dutch	497	0.01
Italian	631	0.01
Vietnamese	580	0.01
Other	5,728	0.10

Once again, Spanish was overwhelmingly the most widely used language with the website translation service, accounting for 0.96 percent of sessions, followed by Chinese (0.11 percent), Japanese (0.08 percent), French (0.06 percent), German (0.06 percent), Korean (0.03 percent, Portuguese (0.02 percent, Turkish (0.02 percent) and Other (0.10 percent). **Figure 9** shows the number of translated sessions by language.



The website was translated to 32 other languages that each accounted less than 0.01 percent of the sessions—collectively, these viewings account for 0.04 percent of all sessions. These languages include:

- Afrikaans
- Arabic
- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Dutch
- Farsi
- Filipino
- Finnis
- Greek
- Hebrew
- Hindi
- Hungarian
- Indonesian
- Italian
- Latin
- Norwegian
- Polish
- Romanian
- Russian
- 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 Transit Employee Survey revealed that 23 percent of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 80 percent of respondents reported requests for Spanish. The Customer Service call log showed that a mere three 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 1.5 percent of sessions were translated—most of which were translated to Spanish. The website was translated to 43 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 is to identify critical services. Next, input from community organizations was used to identify ways to improve these services for LEP populations. The USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (DOT 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 next bus and light rail specific services:

- Press Releases
- Public materials including, but not limited to:
 - o Route Scout (announcements on buses and light rail)
 - o Ride Guide and Destinations Guide
 - o Service changes materials
 - o Transit Book
 - o Website
 - o COVID-19 updates
 - o Project updates
 - o Title VI forms
 - o 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:
 - o Car cards (on-board advertisements)
 - o Bus signage (priority seating, caution signs, entry/exit, etc.)
 - o Variable message sign (VMS)² that displays audio announcements on buses
- Light Rail specific services:
 - o Light rail transit vehicle signage including priority seating, code of conduct, and other train information
 - o VMS³ announcements on vehicles and at stations
 - o System maps and auxiliary information
 - o Operator call boxes on trains
 - o Emergency call box at stations
 - o Safe place notices

² 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

³ 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

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.

Community Outreach

Valley Metro conducted interviews with six community organizations that encounter various LEP populations. Organizations were identified to ensure that a wide variety of cultural and language groups were reached over large service areas. In response to the COVID-19 pandemic, all surveys were conducted by phone call or electronically. These organizations were asked a series of questions from the FTA handbook, “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (FTA 2007). These organizations indicated that they serve populations speaking a broad range of languages, including Spanish, Arabic, and Swahili. The organizations interviewed range from cultural adult centers to refugee services organizations:

- Ability 360 – a local non-profit that provides services for people with disabilities
- Creighton School District – an elementary school district with 24 percent of students who speak English as a second language
- International Rescue Committee – a refugee support and relocation non-profit
- Isaac Elementary School District – an elementary school district with the highest percentage of English learners (33 percent of students)
- Literacy Volunteers of Maricopa County – a non-profit dedicated to improving adult reading and writing in English
- Turn a New Leaf – a non-profit that provides support for people experiencing homelessness, domestic violence and other challenges

Listed below are key language-related findings from the outreach effort:

1. For populations served by these organizations, public transportation is the main form of transportation to access jobs, medical appointments, social services, grocery shopping and school.
2. Spanish was the most common language spoken among the LEP populations at each organization. Swahili and Arabic were the second most common languages.
3. Organizations interviewed expressed needs of LEP populations regarding language assistance including:
 - a. System Map Information: LEP populations have expressed a difficulty in understanding and familiarizing themselves with system maps.
 - b. Transit Service Information: LEP populations have expressed the desire for information, such as how to ride and fare payment information, be communicated in an understandable format. Symbols could be used to communicate messages to a wider audience. Also, offering orientation to these populations, through their respective agencies, would familiarize them with the transit system.
4. When asked who the LEP populations would most trust to deliver transit messaging, most organizations responded that messaging should come from ethnic community organizations or individuals that speak their languages.

Valley Metro continues to make improvements in language assistance for the LEP population in the region in all areas including the three identified above. See **Appendix C** for completed surveys from each community organization.

This valuable feedback provided a few opportunities for Valley Metro to reduce barriers experienced by LEP riders. In regard to item 3, Valley Metro staff was able to introduce the organizations that expressed this concern to Valley Metro's Transit Education Program. This program can help riders better understand the transit system and provide useful transit service information. More research is needed to understand whether system map and transit service information difficulties are truly language issues, or simply educational issues.

Item 4 could be addressed through coordination with community organizations and the Valley Metro Transit Education Program. Transit education staff should continue to present materials to interested groups and should coordinate with the community organization requesting the presentation to ensure that LEP populations are getting the information they need.

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 USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (DOT 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. Recent public meetings for the South Central Light Rail Extension have taken place in communities where the predominant language is Spanish. To accommodate Spanish speakers, Valley Metro 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's current contract for interpreters at public meetings costs approximately \$200 per meeting. Annually, \$2,000 to \$3,000 is spent to provide interpreters for staff meetings and public hearings. In addition, \$400 to \$800 is spent annually for sign language interpreters at meetings (as requested) and public hearings. Costs for translating and producing materials such as meeting notices, display boards, news releases, and project update sheets are also budgeted annually— approximately \$30,000 to \$35,000. In total, approximately \$33,000 to \$39,000 is contracted out directly in support of language assistance services for interpreters, translation, and materials dependent on the projects and programs implemented each year.

Additional costs include other staff time used on an ad hoc or regular basis to provide translation or interpretive services. More than 30 percent of public relations and 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 *valleymetro.org*

Strategies for consolidating the regional language assistance measures to achieve efficiencies may include:

- Creating an 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 that 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

Requests for added services include expanded symbols to understand how to use transit services, on-board messaging and system map information. With a commitment to providing reasonable language assistance measures, Valley Metro will 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. With expanded use of symbols, it is expected that the need for enhancing the on-board messaging and system map information may be reduced. Furthermore, these could be incorporated into the regular updates of this information and signage. 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 52 languages (www.translate.google.com). 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.

6.2 Staff Training

Specific policies and procedures for interacting with LEP persons are not formally adopted on a standalone 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 customer assistance system 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 of the Civil Rights Act of 1964 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" (FTA 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 USDOT's "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005), and the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 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.

APPENDIX A – TRANSIT EMPLOYEE INSTRUMENT

Language Assistance Program Survey 2021

Name: _____

1. Have you had any requests for information or materials in other languages in the past two years?

- a. Yes
- b. No

If yes, please complete the remainder of the survey.
If no, thank you for your participation.

2. Which language(s) have been requested?

3. How often do you receive requests?

- a. More than once a week
- b. Once a week
- c. More than once a month
- d. Once a month
- e. Once every three months
- f. Once every six months
- g. Once a year
- h. Other: _____

4. Do you have the resources needed to help customers with language requests?

- a. Yes
- b. Sometimes
- c. No

APPENDIX B – WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percent of Total Sessions
Afrikaans	35	0.00
Arabic	557	0.01
Bulgarian	33	0.00
Chinese	6,506	0.11
Croatian	63	0.00
Czech	220	0.00
Danish	17	0.00
Dutch	497	0.01
English	5,659,734	98.56
Farsi	29	0.00
Filipino	25	0.00
Finnish	200	0.00
French	3,293	0.06
German	3,167	0.06
Greek	90	0.00
Hebrew	77	0.00
Hindi	27	0.00
Hungarian	65	0.00
Indonesian	122	0.00
Italian	631	0.01
Japanese	4,837	0.08
Korean	1,750	0.03
Latin	119	0.00
Norwegian	198	0.00
Polish	243	0.00
Portuguese	1,297	0.02
Romanian	79	0.00
Russian	898	0.02
Samoan	38	0.00
Serbian	18	0.00
Slovak	58	0.00
Slovenian	114	0.00
Spanish	55,257	0.96
Swedish	288	0.01
Telugu	83	0.00
Thai	24	0.00
Tonga	22	0.00
Turkish	1,028	0.02
Ukrainian	30	0.00
Unknown	175	0.00
Vietnamese	580	0.01
Total	5,742,597	100

APPENDIX C – LEP COMMUNITY OUTREACH SURVEYS CONSOLIDATED

Ability 360

2/11/2021

1. What geographic area does your agency serve?

The Phoenix Metro area, although we have people that come as far as Payson. We cover near and far.

2. What kind of services does your organization provide?

Sports, fitness and health-related activity for total inclusion in the community. The main facility does handle home-health, and community integration services.

3. How many people does your agency provide services to?

2,300-2800 was the last member count. The numbers have decreased due to the pandemic.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

Increased over the last five years.

5. What are the countries of origin from which your population has immigrated?

Iran, Iraq, Puerto Rico, Mexico, people from all around the world that are here using the gym on a regular basis.

6. Does your population come from an urban or rural background?

I don't know.

7. What are the languages spoken by the population you serve?

English
Spanish
Arabic

8. What is the age of your population?

No idea. Due to coronavirus, a lot of things have changed. We serve more adults right now than children. In normal times, we cover the entire continuum.

9. What is the education and literacy level of the population you serve?

Here to there. The fact that our population has disabilities, it's difficult to say. I myself don't have that knowledge and it's not something we normally ask.

10. What needs or expectations for public transportation services has this population expressed?

We are so thankful for the stop at the top of the hill. That's made a huge difference in our client's lives. Just the other day, there was a man who took two buses and the light rail to get here. It's been his lifeline.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

I don't know.

12. What are the most frequently traveled destinations?

Everywhere. They jump on the light rail. Most of our population do not drive.

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

I don't know.

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

I don't know.

15. What is the best way to obtain input from the population?

Survey. Either paper or electronic. All our registrations are done by app and website.

16. Who would the population trust most in delivering language appropriate messages?

I don't know.

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

I don't know.

Creighton School District

1/27/2021

1. What geographic area does your agency serve?

Creighton School District serves the following geographical area: 16th ST – 32nd ST from N Van Buren to Indian School and from 32nd ST - 40th ST from N Van Buren to Lincoln Drive.

2. What kind of services does your organization provide?

In addition to educational services, we offer transportation services to McKinney-Vento eligible families, which are families experiencing homelessness. Our district is able to provide transportation assistance to families experiencing homelessness thanks to our McKinney-Vento grant.

3. How many people does your agency provide services to?

As of January 25th, 2021, our school district serves 167 families in our transportation program. However, the number of families requesting transportation assistance is increasing due to the COVID pandemic.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

For the past five years we have experienced a decline in our homeless population. However, the number of families requesting transportation assistance is increasing due to the COVID pandemic.

5. What are the countries of origin from which your population has immigrated?

Creighton School District serves families who have immigrated from mostly México, South America, and Africa.

6. Does your population come from an urban or rural background?

Most of our families come from urban areas, but we do have a small percentage of families who come from rural areas.

7. What are the languages spoken by the population you serve?

Our district serves families that speak over 26 languages, however Spanish is the most common language in our community.

8. What is the age of your population?

Our district serves students between ages 3 to 14 years old (Preschool to 8th grade).

9. What is the education and literacy level of the population you serve?

We serve low-income families and commonly their level of literacy varies from each household from Middle School to some High School education. A small percentage of our families have completed graduate and undergraduate education.

10. What needs or expectations for public transportation services has this population expressed?

Most of our families request transportation services for school, doctor appointments, counseling, or other social services.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

Yes, since we serve low income families, we do receive many transportation requests. However, our district is able to provide transportation assistance to families experiencing homelessness thanks to our McKinney Vento grant.

12. What are the most frequently traveled destinations?

Most of our families request transportation services for school, doctor appointments, counseling, or other social services.

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

Not at this time.

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

Yes.

15. What is the best way to obtain input from the population?

Our community respond well to in person meetings, phone calls, email or texts.

16. Who would the population trust most in delivering language appropriate messages?

Our community trusts school officials or people who speak their native language.

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

Yes we used some, but we would like to have more information about the tools and resources you have available for community members.

International Rescue Committee

1/14/2021

1. What geographic area does your agency serve?

West Phoenix, I-17 corridor, Glendale, various others

2. What kind of services does your organization provide?

Refugee Resettlement: Employment, financial coaching and credit building, English language classes, case management, school support, clinical therapy, immigration services

3. How many people does your agency provide services to?

1,200+

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

Decreased (COVID-19, public policy)

5. What are the countries of origin from which your population has immigrated?

Democratic Republic of the Congo, Myanmar, Afghanistan, Eritrea, Guatemala, Iraq, and more

6. Does your population come from an urban or rural background?

Predominately rural

7. What are the languages spoken by the population you serve?

Swahili, Kinyarwanda, Arabic, Dari, Burmese, Afar, Tigrinya, French, Rohingya, Spanish, and many smaller tribal languages: Kinyabwisha, Chin, Kibembe, Lingala, etc.

8. What is the age of your population?

0-99

9. What is the education and literacy level of the population you serve?

Varies; predominantly below secondary school

10. What needs or expectations for public transportation services has this population expressed?

Wait times between buses, especially during hot summer months; reliability/timeliness

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

Refugees are dependent on public transportation

12. What are the most frequently traveled destinations?

Apartment complexes, schools, grocery stores, DES at 43rd/Olive, warehousing/manufacturing between Van Buren and Buckeye, between 35th and 91st Ave

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

Employment around Buckeye and 83rd Ave

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

No

15. What is the best way to obtain input from the population?

Engage with Ethnic Community Based Organizations, who can support listening sessions

16. Who would the population trust most in delivering language appropriate messages?

Ethnic Community Based Organizations, International Rescue Committee and other resettlement agencies

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

The agency passes out transit books and conducts internal transit training. Unaware of other opportunities and resources.

Literacy Volunteers of Maricopa County

1/14/2021

1. What geographic area does your agency serve?

City of Phoenix, 3 locations; and virtually.

2. What kind of services does your organization provide?

Free adult education services, two programs:

-Adult Basic/Secondary Education, and GED preparation to attain High School Equivalency Diploma.

-English Language Acquisition for Adults (formerly referred to as English as a Second Language ESL).

3. How many people does your agency provide services to?

Approximately 700.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

Slight decrease

5. What are the countries of origin from which your population has immigrated?

All over the world; most recently African countries and Middle Eastern countries.

6. Does your population come from an urban or rural background?

City of Phoenix: urban

7. What are the languages spoken by the population you serve?

Many different languages; all instruction delivered only in English language.

8. What is the age of your population?

16-99; median about 40-50.

9. What is the education and literacy level of the population you serve?

Lower levels of literacy, compared to 4th grade level or lower.

10. What needs or expectations for public transportation services has this population expressed?

Not aware of any.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

Unknown

12. What are the most frequently traveled destinations?

Unknown

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

Unknown

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

Unknown

15. What is the best way to obtain input from the population?

Survey

16. Who would the population trust most in delivering language appropriate messages?

Their own community leaders

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

No. Unaware of services.

Isaac Elementary School District

2/24/2021

1. What geographic area does your agency serve?

Isaac Elementary School District is located in West Phoenix

2. What kind of services does your organization provide?

Education

3. How many people does your agency provide services to?

3000 students

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

Increased

5. What are the countries of origin from which your population has immigrated?

Many countries including but not limited to: Mexico, India, Tanzania, Democratic Republic of Congo, Uganda, Pakistan, Nigeria, Kenya

6. Does your population come from an urban or rural background?

Both

7. What are the languages spoken by the population you serve?

1) Spanish (97% of English Learners), 2) Swahili (1%) 3) Kirundi (1%) 4) Other (1%)

8. What is the age of your population?

Youth 5-11 years old

9. What is the education and literacy level of the population you serve?

Elementary school

10. What needs or expectations for public transportation services has this population expressed?

Students and families use public transportation

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

Somewhat

12. What are the most frequently traveled destinations?

Travel has decreased during COVID-19

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

No

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

Unsure

15. What is the best way to obtain input from the population?

Unsure

16. Who would the population trust most in delivering language appropriate messages?

People that speak their language

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

We have done this in the past but it has been a while

Turn a New Leaf

1/14/2021

1. What geographic area does your agency serve?

Maricopa County

2. What kind of services does your organization provide?

Housing, Shelter, Behavioral Health Services, Children Services

3. How many people does your agency provide services to?

Last year over 30,000

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

Increased

5. What are the countries of origin from which your population has immigrated?

Mexico

6. Does your population come from an urban or rural background?

Urban

7. What are the languages spoken by the population you serve?

Mostly English and Spanish

8. What is the age of your population?

We serve all ages groups from infants in our childcare centers to those over 62 in our shelter and housing programs

9. What is the education and literacy level of the population you serve?

A majority of our participants have a GED

10. What needs or expectations for public transportation services has this population expressed?

Some of our clients have expressed more routes that run earlier and later than current hours and more opportunities for discounted fares

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

A majority of those we serve to rely on public transportation and some that are new to the area due struggle to operate the bus system

12. What are the most frequently traveled destinations?

Mostly throughout mesa and phoenix

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

East Mesa (towards apache junction) and the far west valley

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

Not anything noticeable

15. What is the best way to obtain input from the population?

Simple surveys by email or paper surveys offered at the programs

16. Who would the population trust most in delivering language appropriate messages?

The case managers or support staff working with them in the individual programs

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

I can say for the program I oversee, (shelter and housing) I was not aware of these tools and I would interested in receiving information. malberti@turnanewleaf.org



Title VI Attachment “C”

Regional System Wide Standards and Policies



Overview

Valley Metro, as the regional transit authority, operates the majority of transit service in Maricopa County with the exception of the City of Phoenix, City of Glendale’s local circulator and City of Scottsdale’s downtown trolley. Valley Metro coordinated with the City of Phoenix to develop a Regional System-Wide Service Standards and Policies that applies to all services that both entities provide, but they can be also adopted by the cities of Glendale and Scottsdale. Valley Metro also operates the region’s light rail transit system and has developed a separate set of System-Wide Standards and Policies for light rail. Valley Metro, in coordination with the City of Mesa, is currently constructing a light rail extension further into their community. In Tempe, Valley Metro is coordinating with the City to complete the design for a streetcar project and are currently relocating utilities. In addition, Valley Metro is coordinating with the City of Phoenix for the final design of three light rail extensions further into their community. All will adhere to the standards and policies outlined below.

Regional Service Policies for Bus Service

The regional service policies are meant to ensure that transit amenities are distributed fairly throughout the system and vehicles are properly assigned on a route-by-route basis.

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

Vehicle assignment refers to the process by which transit vehicles are placed into revenue service throughout the transit system. Vehicles will be assigned to the various depots such that the average age of the fleet serving each depot does not exceed 12 years. Low-floor buses are deployed on frequent service and other high-ridership routes, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and an automated stop announcement system.

Bus assignments take into account the performance characteristics of service types, and vehicle assignments are matched to the demand (vehicle with more capacity are assigned to service types with higher ridership). Note that some service types have specific vehicle types. Other bus assignments also take into consideration branded service, such as Express/RAPID routes, that has specific sub fleet assignment to it.

1.2 Service Policy Elements

- Vehicle age
- Vehicle assignment records (dispatch bus pullout sheets). The contractor dispatch staff assigns buses daily based on historical knowledge of the route.

1.3 Level of Service Assessment

- Calculate the average age of the entire bus fleet.
- Calculate the average age of the buses assigned to serve minority and low-income routes and for non-minority and non-low-income routes.
- Assessment compares minority to non-minority routes and low income to non-low-income routes.

2.0 DISTRIBUTION OF TRANSIT AMENITIES

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service standard elements and level of service assessments will be the responsibility of the individual municipalities. Valley Metro does, however, provide support in the planning processes of these facilities.

Regional Service Standards for Bus Service

The regional service standards are quantitative performance standards meant to ensure that fixed route services are fairly applied throughout Valley Metro’s service area.

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

Vehicle load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. Valley Metro and the City of Phoenix operates a number of local fixed routes, express routes and circulator service in the region with a number of different bus configurations containing different numbers of seats and how many people can stand on the bus. The vehicle load threshold is, therefore, broken down to the three main types of service that are based on the average number of seats and the number of standing passengers. The load thresholds are identified below:

Local Fixed Route Service (as defined in Transit Standards and Performance Measures [TSPM] are Local Bus, Key Local Bus, Limited Stop All-Day)

Two bus types provide local fixed service in the region—a standard 40-foot bus and a 60-foot articulated bus.

A 40-foot bus contains 36 seats and can comfortably hold 54 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 18 standees per bus.

The 60-foot articulated bus contains 55 seats and can comfortably hold 85 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 30 standees per bus.

Commuter Express/RAPID Service/Limited Stop Peak⁴

Two bus types provide Express service in the region—a standard 40-foot bus and a 60-foot articulated bus.

A 40-foot bus contains 36 seats and can comfortably hold 54 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 18 standees per bus.

The 60-foot articulated bus contains 55 seats and can comfortably hold 85 passengers. The vehicle load threshold for peak service is expressed as a ratio of 1.50. This means that all seats are filled and there are 30 standees per bus.

Community Circulator Service

The buses used for the circulators can, on average, seat 17 passengers and comfortably hold 23 passengers. The vehicle load threshold for all day service (such as the BUZZ, ZOOM, MARY, ALEX, SMART, DASH and Orbits) is expressed as a ratio of 1.35. This means that all seats are filled and there are 6 standees per bus. All buses providing this service are ADA accessible.

Rural Connector

The buses used for the rural connectors can, on average, seat 32 passengers and comfortably hold 38 passengers. The vehicle load threshold for all day service is expressed as a ratio of 1.18. This means that all seats are filled and there are 9 standees per bus. All buses providing this service are ADA accessible.

1.2 Vehicle Load Data Collection

To determine the vehicle load, the following data is gathered:

- Annual random ride check samples or APC data
- Each ride check is one trip on a route
- AM Peak direction samples Monday through Friday
- PM Peak direction samples Monday through Friday
- Samples collected annually throughout the year

1.3 Vehicle Load Assessment

Using the data above, the following analysis is done to determine the vehicle load:

Local Fixed Route Service (Local Bus, Key Local Bus, Limited Stop All-Day)

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.50 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

Commuter Express/RAPID Service/Limited Stop Peak¹

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.50 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

Community Circulator Service

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.0 for AM and PM Non-Peak times and calculate the percentages
- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.40 for AM and PM peak times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

Rural Connector

- Determine number of minority and non-minority routes that have a maximum load ratio of less than 1.35 for all trip times and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low income and non-low-income routes

¹ Note that Commuter Express/RAPID Services minority and low-income routes are determined by stop location (rather than full route) since the majority of these routes travel from a park-and-ride location to a major employment center along a freeway or other corridor without making stops.

2.0 VEHICLE HEADWAY

Vehicle headway standards are based on the TSPM² for regionally funded routes. Transit service standards and performance measures represent rules and guidelines by which the performance of the region’s transit system may be evaluated, and decisions regarding transit investments may be prioritized and measured.

2.1 Vehicle Headway Standard

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. Table 6 shows the vehicle headway standards for the region.

Table 6 – Vehicle Headway Standards

Service Type	Minimum Headway or Daily Trips	Minimum Span (Week/Sat/Sun)	Minimum Operating Days
Rural Connector	4 trips inbound/4 trips outbound	NA	Mon–Fri
Community/Circulator	30 min	12 hrs/0 hrs/0 hrs	Mon–Fri
Local Bus	30 min*	16 hrs/14 hrs/12 hrs	Mon–Sun
Service Type	Minimum Headway or Daily Trips	Minimum Span (Week/Sat/Sun)	Minimum Operating Days
Key Local Bus	15 min peak/30 min base*	16 hrs/14 hrs/12 hrs	Mon–Sun
Limited Stop Peak	4 trips AM/4 trips PM	NA	Mon–Fri
Limited Stop All-Day	Headways same as LRT, up to 2X peak	16 hrs/14 hrs/12 hrs (same as LRT)	Mon–Fri
Commuter Express	4 trips AM/4 trips PM	NA	Mon–Fri
Light Rail Transit	12 min peak/20 min base	18 hrs/14 hrs/12 hrs	Mon–Sun

*60 min early morning and late night

For rural connector routes, limited stop peak and commuter express routes, service availability is applied based on a number of daily trips rather than frequency.

2.2 Vehicle Headway Data Collection

Local Fixed Route Service (Local Bus, Key Local Bus, Limited Stop All-Day)

- Measure standard using published fixed route service schedules (no Express, RAPID, Limited Stop Peak or circulator routes)

Commuter Express/RAPID Service/Limited Stop Peak

- Measure standard using published Express, RAPID and Limited Stop Peak service schedules

² More information about this effort available here:

http://www.valleymetro.org/publications_reports/transit_standards_performance_measures

Circulator Service

- Measure standard using published circulator route service schedules

Rural Connector

- Measure standard using published Rural Connector service schedules

2.3 Vehicle Headway Assessment

- Determine number of minority and non-minority routes that have a peak headway meeting or exceeding the headway standard for each service type and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

On time performance is a measure of bus runs for a particular route completed as scheduled. The service standard threshold is defined as 90 percent or better of all trips on a particular route completed within the allowed on-time window (no more than 0 minutes early and 5 minutes 59 seconds late, compared to scheduled arrival/departure times at published time points).

3.2 On Time Performance Data Collection

- Measure standard using Valley Metro operated local fixed routes
- Report data on a monthly basis
- Use Vehicle Management System (VMS) data. VMS data is not available for the circulators GUS I, II, III and Tempe's Orbits

3.3 On Time Performance Assessment

- Determine number of minority and non-minority routes that have an on-time performance of 90 percent or better on an annual basis and calculate the percentages
- Repeat the calculations for low-income and non-low-income routes
- Compare level of service between minority and non-minority routes and low-income and non-low-income routes

4.0 SERVICE AVAILABILITY

Transit amenities are locally funded and fall under the responsibility of the jurisdictions within which they are sited. The service availability and service availability assessments are the responsibility of the individual municipalities.

4.1 Service Availability Standard

Service availability is measured by the distribution of bus stops within the regional service area that afford residents accessibility to transit. The service standard is consistent with the TSPM standard and has the following thresholds for each service:

Local Bus and Key Local Bus

- Bus stops are placed approximately 0.25 mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted

Limited Stop Peak and Limited Stop All-Day

- Bus stops are placed approximately one mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted

Express/RAPID Service

- Express/RAPID stops are strategically placed and are generally located at park-and-ride facilities
- No more than four inbound Express bus stops
- Outbound Express/RAPID stops behave more like a local service and will pick up or drop off passengers more frequently

Community Circulator Service

- Bus stops within the designated stop area of each circulator route are placed no more than 0.25 mile apart
- In the flag stop zone area of each circulator route, passengers can be picked up anywhere along the route

4.2 Service Availability Data Collection

- Bus stop database

4.3 Service Availability Assessment

- Identify number of bus stop spacing gaps on each route
- Calculate the number of bus stop spacing gaps that do not meet the standard as a percentage of the total number of bus stop spacing gaps on a given route
- Compare percentage of bus stop location gaps that do not meet the standard by minority versus non-minority routes and low-income versus non-low-income routes

Regional Service Policies for Light Rail Service

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

The Vehicle Assignment service policy generally addresses the equitable assignment of transit vehicles to depots and routes throughout the entire transit system in terms of minority and low-income populations compared to non-minority and non-low income populations. This policy measures whether transit vehicles are equitably assigned considering the age of the vehicle, type of fuel used, number of seats in the vehicle and whether or not the vehicle is high or low floor. However, Valley Metro has one light rail route with a single type of fleet. Valley Metro's light rail fleet consists of 50 vehicles of the same design, passenger load, amenities and age. The light rail vehicles are considered low floor at each of the four doors to allow level boarding at each of the 35 light rail stations. Each light rail vehicle is equipped with air conditioning and heating, automated stop announcements, a bike rack that holds four bikes and folding seats to accommodate four wheel chairs.

1.2 Service Assessment

All vehicles put into service each day run along the one light rail route and have the same amenities and quality for all passengers riding the system. Until new routes are added to the system that contain different vehicles, no assessment of vehicle assignment is warranted.

2.0 DISTRIBUTION OF TRANSIT AMENITIES

2.1 Service Standard

Transit amenities refer to items of comfort and convenience available to the general riding public. Valley Metro's *Design Criteria Manual* includes a chapter on light rail station design. This chapter provides standards for the design of each station and the amenities that will be incorporated into each station. Each of the 28 stations within Valley Metro's current light rail system contain the following amenities:

- Shading and climate protection
- Seating
- Lighting
- Drinking fountain
- Trash receptacles
- Platform information maps
- Emergency call boxes
- Closed circuit television cameras
- Public address system/variable message boards
- Ticket vending machines
- Double loading light rail station platforms (except where adequate pedestrian crossing is not available)

In addition, each station has a securable rack for four bicycles located at street intersections adjoining the station entrances. Although the *Design Criteria Manual* has been developed as a set of general guidelines for planning and design of the light rail system, deviations from these accepted criteria may be required in specific instances based on community characteristics or other requests. Typically, new development is compliant with the *Design Criteria Manual*.

2.2 Service Assessment:

Valley Metro will conduct field observations once a year to determine if each station still contains the following amenities in good operational order:

- Information maps and public announcements at each station are in English and Spanish
- Ticket vending machines at each station entrance
- Seating
- Waste receptacles
- Bike racks
- Lighting

Regional Service Standards for Light Rail Service

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

Vehicle Load (also known as maximum load) is the ratio of the number of passengers on a vehicle to the number of seats. For the existing light rail system (26-mile fixed route rail service), a single light rail vehicle contains 66 seats and can hold comfortably 140 passengers. The vehicle load threshold for peak service for comfortable accommodation is expressed as a ratio of 2.12. This means that all seats are filled and there are 74 standees per train.

A single vehicle has a maximum capacity (crush factor) of 226 passengers. The vehicle load threshold for peak service for maximum capacity is expressed as a ratio of 3.42. This means that all seats are filled and there are 160 standees per train.

Valley Metro has the ability to operate consists of up to three light rail vehicles.

1.2 Vehicle Load Data Collection

Average weekday loads on the light rail will be determined by the following:

- Ride check the light rail route using the APC data
- AM in the peak direction (6–9 a.m.) Monday through Friday
- PM in the peak direction (3–6 p.m.) Monday through Friday

Samples will be collected semi-annually during the months of April and November to determine if the standard vehicles load is exceeded.

1.3 Vehicle Load Assessment

Valley Metro currently has one light rail line operating in the region with all vehicles being exactly the same. Therefore, the data collected above will be used to determine the vehicle load.

2.0 VEHICLE HEADWAY

2.1 Vehicle Headway Standard

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same line. Table 6 shows the vehicle headway thresholds for the light rail system.

Service operates regionally every 12 minutes in the peak hours (6 a.m.–7 p.m.) each weekday, every 20 minutes in the off peak hours (4 a.m.–6 a.m. and 7 p.m.–12 a.m.) each weekday and every 20 minutes all day on weekends.

Table 6 – Vehicle Headway Standards

Service Type	Headway - Peak	Headway – Off Peak
Weekday	12 minutes	20 minutes
Saturday	20 minutes	
Sunday / Holiday	20 minutes	

2.2 Vehicle Headway Data Collection and Service Assessment

Valley Metro currently has one light rail route under operation with 28 stations and the headway is monitored on a daily basis. As new extensions are added to the current light rail ends of line (extending light rail from current end-of-line at Sycamore and Montebello) the service assessment will be for this route in its entirety. As new routes to the system are brought into service, the service assessment will be by individual routes. Headways are monitored at the Operations Center and will be assessed by the following:

- AM in the peak direction (6–9 a.m.) weekdays
- PM in the peak direction (3–6 p.m.) weekdays
- AM in the peak direction (6–9 a.m.) weekends
- PM in the peak direction (3–6 p.m.) weekends

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

On time performance is a measure of a light rail trip (end-of-line Mesa Drive station to the end-of-line 19th Ave/Dunlap station) completed as scheduled. Once the extension in Mesa is complete and operational, the light rail trip will be measured from the end-of-line Gilbert Road station to the end-of-line 19th Ave/Dunlap station. The service standard threshold is defined as 93 percent or better of all trips on light rail route completed within the allowed on-time window (0 minutes early and 5 minutes late of scheduled arrival times).

3.2 On Time Performance Data Collection and Assessment

Valley Metro currently has one light rail route under operation and it has 35 stations. Valley Metro monitors the on-time performance on an annual basis and makes year to year comparisons. As new extensions are added to the current light rail ends of line, the service assessment will be for this route in its entirety. As new routes to the system are brought into service, the service assessment will be by individual routes. On-time performance is monitored at the Operations Center and is assessed through the SCADA network by the following:

- AM in the peak direction (6–9 a.m.) weekdays
- PM in the peak direction (3–6 p.m.) weekdays
- AM in the peak direction (6–9 a.m.) weekends
- PM in the peak direction (3–6 p.m.) weekends

4.0 SERVICE AVAILABILITY

4.1 Service Availability Standard

Service availability is measured by the distribution of light rail stations along the light rail route that afford residents accessibility to the regional transit system. The service standard has two thresholds:

- Light rail stations are placed approximately one mile apart. Where development patterns are of higher or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted.
- General considerations for light rail stations are based on the following criteria:
 - Density of population and employment
 - Mix of land uses
 - Connection to other transit services
 - Pedestrian accessibility to the station
 - Planning and design characteristics that support transit oriented development and transit access

4.2 Service Availability Assessment

Valley Metro will assess the light rail service availability through the following:

- Identify light rail station-to-station spacing using the light rail station database
- Identify the minority and low-income populations served within 0.5 mile of each station
- Estimate the number of transit connections at each station