
Copa Health, Inc.
Title VI Implementation Plan



June 2022 - June 2025

Contents

Title VI Policy Statement	3
Title VI Notice to the Public - English	4
Título VI Aviso al público - Español.....	5
Title VI Complaint Procedures - English	5
Título VI Procedimientos de reclamación - Español.....	8
Title VI Complaint Form - English	10
Forma Para Poner una Queja (De Acuerdo Al Título VI) - Español.....	12
Title VI Investigations, Complaints, and Lawsuits	14
Public Participation Plan.....	15
Non-elected Committees Membership Table	17
Monitoring for Subrecipient Title VI Compliance.....	18
Title VI Equity Analysis.....	19
Board Approval for the Title VI Program.....	20

Title VI Policy Statement

The Copa Health, Inc. 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 Copa Health, Inc. sponsored program or activity. There is no distinction between the sources of funding.

Copa Health, Inc. 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, Copa Health, Inc. will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Copa Health, Inc. distributes Federal-aid funds to another entity/person, Copa Health, Inc. will ensure all subrecipients fully comply with Copa Health, Inc.’s Title VI Nondiscrimination Program requirements. The Chief Executive Officer has delegated the authority to Mark Tompert, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Shar Najafi-Piper, Ph.D.
Chief Executive Officer

Title VI Notice to the Public - English

Notifying the Public of Rights Under Title VI Copa Health, Inc.

Copa Health, Inc. 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 Copa Health, Inc.

For more information on Copa Health, Inc.'s civil rights program, and the procedures to file a complaint, contact Corporate Compliance at 480-969-3800; email CorpCompliance@CopaHealth.org; or visit our administrative office at 924 N Country Club Drive, Mesa, AZ 85201. For more information, visit www.CopaHealth.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 Corporate Compliance at 480-969-3800. Para información en Español llame: Corporate Compliance at 480-969-3800.

The above notices are posted online at www.CopaHealth.org; in each vehicle and in the following offices where the public is served:

924 N Country Club Dr, Mesa AZ 85201

10839 Apache Tr., Ste 125, Mesa 85208

737 W Guadalupe Rd, Ste 101, Mesa AZ 85210

10617 E Oasis Dr., Mesa 85208

Título VI Aviso al público - Español

Aviso al Público Sobre los Derechos Bajo el Título VI Copa Health, Inc.

Copa Health, Inc. (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 Copa Health, Inc.'s programa de derechos civiles, y los procedimientos para presentar una queja, contacte Corporate Compliance at 480-969-3800; o visite nuestra oficina administrativa en 924 North Country Club Drive, Mesa, AZ 85201. Para obtener más información, visite www.CopaHealth.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

Los avisos anteriores se publican en línea en www.CopaHealth.org; en cada vehículo financiado por la subvención y en las siguientes oficinas donde se atiende al público:

924 N Country Club Dr, Mesa AZ 85201
737 W Guadalupe Rd, Ste 101, Mesa AZ 85210

10839 Apache Tr., Ste 125, Mesa 85208
10617 E Oasis Dr., Mesa 85208

Title VI Complaint Procedures - English

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to any program or activity that is administered by Copa Health, Inc. including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

Any person who believes s/he has been discriminated against on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form attached to this procedure.

Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainants, or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.

Complaints must be in writing and signed by the complainants and must include the complainants' name, address and phone number. The Title VI contact person will assist the complainants with documenting the issues if necessary.

Allegations received by fax or email will be acknowledged and processed, once the identity of the complainants and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.

Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.

Once submitted agency will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgment letter informing her/him whether the complaint will be investigated by the agency or submitted to the state or federal authority for guidance.

Agency will notify the Title VI Coordinator of all Title VI complaints within 72 hours via telephone at 602-262-7242; email to: PHXTransitEO@phoenix.gov.

Agency has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 40 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, s/he will issue one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, s/he has 30 days after the date of either letter to do so.

A complainant dissatisfied with agency decision may file a complaint directly with the City of Phoenix Public Transit Department, Attention: Title VI Coordinator, 302 N 1st Ave., Ste. 900, Phoenix, AZ 85003 or the Federal Transit Administration offices of Civil Rights: Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590.

A copy of these procedures can be found at CopaHealth.org.

Título VI Procedimientos de reclamación - Español

Estos procedimientos proporcionan orientación para todas las quejas presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964, ya que se relacionan con cualquier programa o actividad que sea administrada por Copa Health, Inc., incluidos consultores, contratistas y proveedores. La intimidación o represalias como resultado de una queja está prohibida por la ley. Además de estos procedimientos, los denunciantes se reservan el derecho de presentar una queja formal ante otras agencias estatales o federales o de buscar un abogado privado para las quejas que alegan discriminación. Se hará todo lo posible para resolver las quejas al nivel más bajo posible.

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional puede presentar una queja del Título VI completando y presentando el Formulario de Queja del Título VI de la agencia adjunto a este procedimiento.

Las quejas formales deben presentarse dentro de los 180 días calendario posteriores a la última fecha del presunto acto de discriminación o la fecha en que los denunciantes tuvieron conocimiento de la presunta discriminación, o cuando ha habido un curso continuo de conducta, la fecha en que se suspendió la conducta o la última instancia de la conducta.

Las quejas deben ser por escrito y firmadas por los denunciantes y deben incluir el nombre, la dirección y el número de teléfono de los denunciantes. La persona de contacto del Título VI ayudará a los reclamantes a documentar los problemas si es necesario.

Las denuncias recibidas por fax o correo electrónico serán reconocidas y procesadas, una vez que se haya establecido la identidad de los denunciantes y la intención de proceder con la queja. Para ello, el demandante debe enviar por correo una copia original firmada del fax o la transmisión por correo electrónico para que se procese la queja.

Las denuncias recibidas por teléfono se reducirán a escrito y se proporcionarán al reclamante para su confirmación o revisión antes de su procesamiento. Se enviará un formulario de queja al reclamante para que lo complete, firme y devuelva para su procesamiento.

Una vez presentado, la agencia revisará el formulario de queja para determinar la jurisdicción. Todas las quejas recibirán una carta de acuse de recibo informándole si la queja será investigada por la agencia o presentada a la autoridad estatal o federal para obtener orientación.

La Agencia notificará al Coordinador del Título VI de todas las quejas del Título VI dentro de las 72 horas por teléfono al 602-262-7242; correo electrónico a: PHXTransitEO@phoenix.gov.

La agencia tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede ponerse en contacto con el denunciante. El denunciante tiene 60 días

hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Después de que el investigador revise la queja, emitirá una de las dos cartas al demandante: una carta de cierre o una carta de hallazgo. Una carta de cierre resume las acusaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Una carta de hallazgo resume las acusaciones y las entrevistas con respecto al presunto incidente, y explica si se tomará alguna medida disciplinaria, capacitación adicional del miembro del personal u otra acción. Si el demandante desea apelar la decisión, tiene 30 días después de la fecha de cualquiera de las cartas para hacerlo.

Un reclamante insatisfecho con la decisión de la agencia puede presentar una queja directamente ante el Departamento de Transporte Público de la Ciudad de Phoenix, Atención: Coordinador del Título VI, 302 N 1st Ave., Ste. 900, Phoenix, AZ 85003 o las oficinas de Derechos Civiles de la Administración Federal de Tránsito: Atención: Coordinador del Programa título VI, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590.

Una copia de estos procedimientos se puede encontrar en CopaHealth.org.

Title VI Complaint Form - English

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of Alleged Discrimination (Month, Day, Year): _____		
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.		

Section IV:		
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court : _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Copa Health, Inc.

Attn: Corporate Compliance

924 North Country Club Drive

Mesa, AZ 85201

480-969-3800

CorpCompliance@CopaHealth.org

A copy of this form can be found online at www.CopaHealth.org.

Forma Para Poner una Queja (De Acuerdo Al Título VI) - Español

Nota: La siguiente información se necesita para procesar su queja.

Información de la persona que está poniendo la queja:

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Persona A La Que Se Discriminó (alguien que no sea la persona que está poniendo la queja)

Nombre: Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

¿Cuál de las siguientes razones describe por lo que usted siente que se le discriminó?

Raza/Color (Especifique) _____ Nacionalidad (Especifique) _____

¿En qué fecha(s) sucedió la discriminación? _____

Describa la presunta discriminación. Explique qué sucedió y quién cree usted que fue responsable (si necesita más espacio, agregue otra hoja).

Escriba una lista con los nombres de las personas que puedan tener conocimiento de la presunta discriminación y cómo contactarlas.

¿Ha presentado esta queja con otra agencia federal, estatal o local, o con cualquier corte federal o estatal? Marque todas las que apliquen.

Agencia Federal _____ Corte Estatal _____ Corte Federal _
Agencia Local _____ Agencia Estatal _____

Por favor proporcione información de la persona a la que presentó su queja en la agencia/corte.

Nombre: _____
Dirección: _____
Ciudad/Estado/Código Postal: _____
Teléfono(Casa): _____
Teléfono (Trabajo): _____

Por favor firme abajo. Puede anexar cualquier material escrito u otra información que usted crea que es relevante sobre su queja.

Firma de la Persona que presenta la queja

Fecha

Número de Anexos: _____

Someta la forma y cualquier información adicional a:

Copa Health, Inc.
Corporate Compliance
924 North Country Club Drive
Mesa, AZ 85201
480-969-3800
CorpCompliance@CopaHealth.org

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.

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

X Copa Health, Inc. has not had any Title VI complaints, investigations, or lawsuits during the entire review period since the last Title VI Plan was submitted 08.08.2019.

Public Participation Plan

Copa Health, Inc. does not market nor provide transportation services to the general public. Transportation services are exclusively used for individuals who are enrolled in its programs.

As an organization that receives federal assistance, Copa Health provides outreach efforts in the following ways:

- Member, family and guardian surveys, annually. Surveys are provided to all individuals that receive transportation services, including minority, low-income and LEP members. Depending on the method best understood the member, family or guardian, surveys may be oral or written with translation services available.
- Suggestions and input from transportation staff members and direct care providers, as provided.
- Public meetings are held during the first week of December in the specific geographical areas where transportation is provided and during times that allow for maximum participation. Meetings are held in locations that are accessible to the people enrolled in Copa Health's programs and their guardians. Meeting notices are emailed, provided in paper copy, and posted at program offices and in transit vehicles.

Copa Health, Inc. 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.

Limited English Proficiency Plan

Copa Health, Inc. has adopted the City of Phoenix LEP Plan, which is attached.

Non-elected Committees Membership Table

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

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

Body	Caucasian	Latino	African American	Asian American	Native American
Population	0%	0%	0%	0%	0%
	0%	0%	0%	0%	0%
	0%	0%	0%	0%	0%
	0%	0%	0%	0%	0%

Copa Health, Inc. does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

Copa Health, Inc. does NOT have subrecipients.

Title VI Equity Analysis

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

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

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

- Copa Health, Inc. has no storage facilities, maintenance facilities or operations centers covered by these requirements. Copa Health has no current or anticipated plans to develop new transit facilities covered by these requirements.

Board Approval for the Title VI Program

Copa Health, Inc. Board of Directors met November 10, 2022 to approve a resolution adopting this three-year program.

<p><u>Consent Agenda</u></p> <ol style="list-style-type: none"> 1. August 11, 2022 Minutes 2. July, August & September 2022 Financial Statements 3. Title VI Plan Resolution (revised) 4. Policies 	<p>Chair Fowls asked if there was any item from the Consent Agenda that needed to be pulled for clarification or discussion. No item was pulled for further discussion and the Consent Agenda was approved as presented.</p>	<p>The Consent Agenda was approved as presented.</p>
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Language Assistance Plan

Title VI Program

July 2021





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

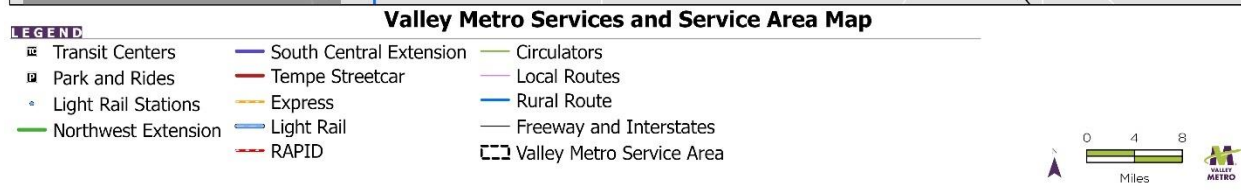
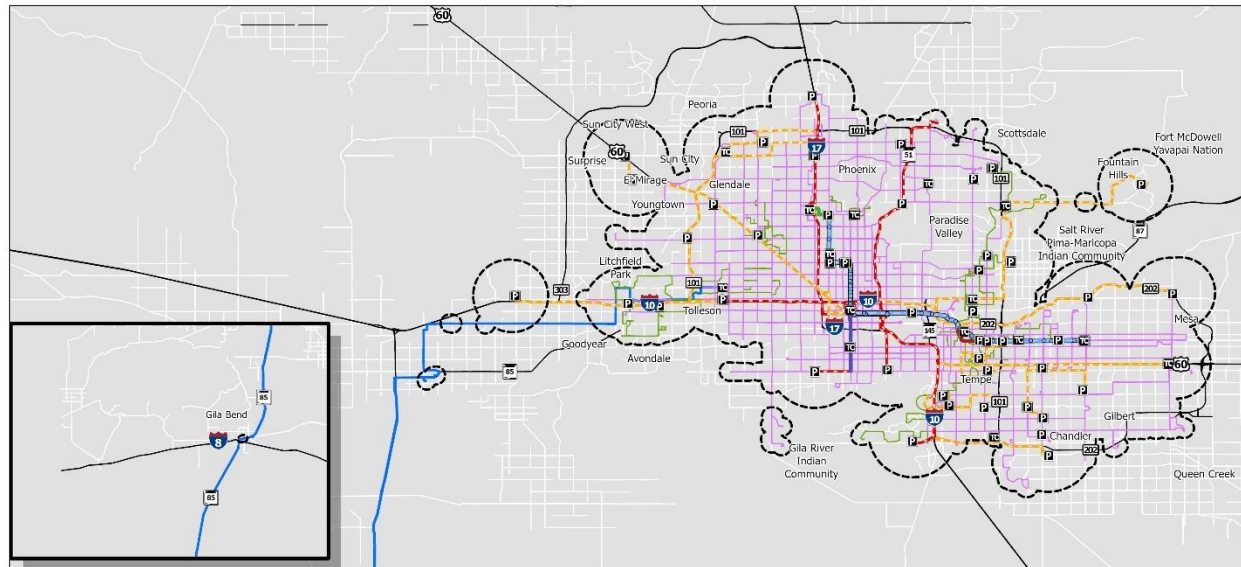


TABLE 1: 2019 ACS DATA, BY LOCATION

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.

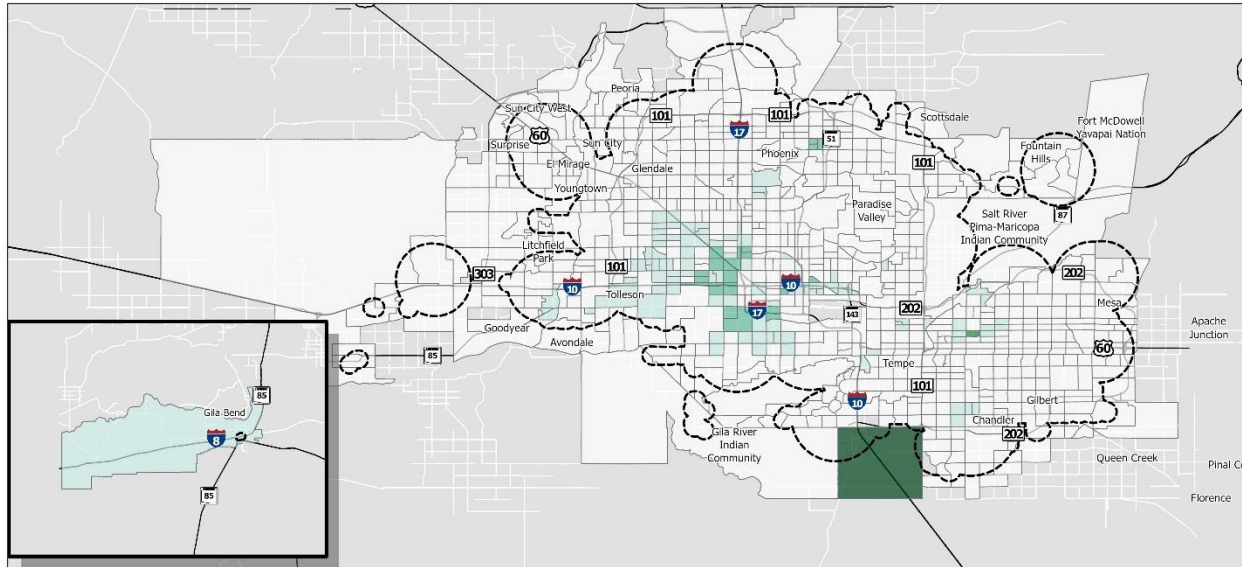
TABLE 3: 2019 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

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

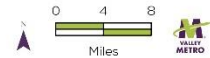
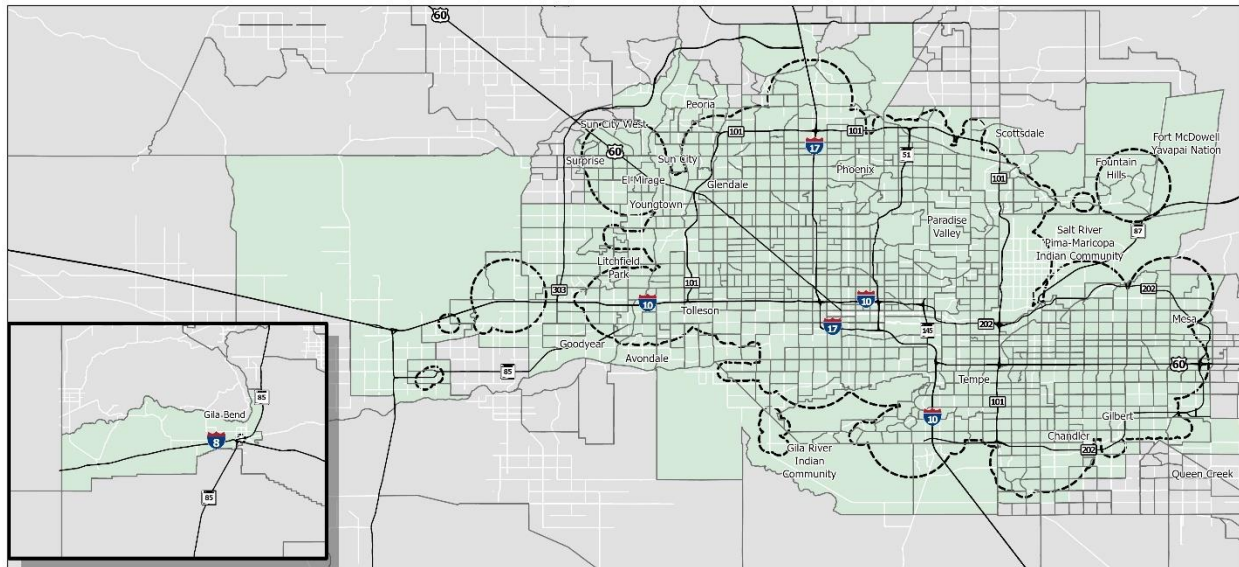


Figure 3 shows the ACS 2019 census tracts within the three-quarter mile buffer of local fixed route service and a three-mile buffer around park-and-ride and transit facilities for express bus service. Census tracts encapsulated within this area are included in the estimates, although they may not be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

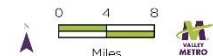
FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



Valley Metro Service Area and Census Tracts

LEGEND

- Freeway and Interstates
- 2019 American Community Survey Tracts
- Impacted Census Tracts
- ⋮ Valley Metro 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).

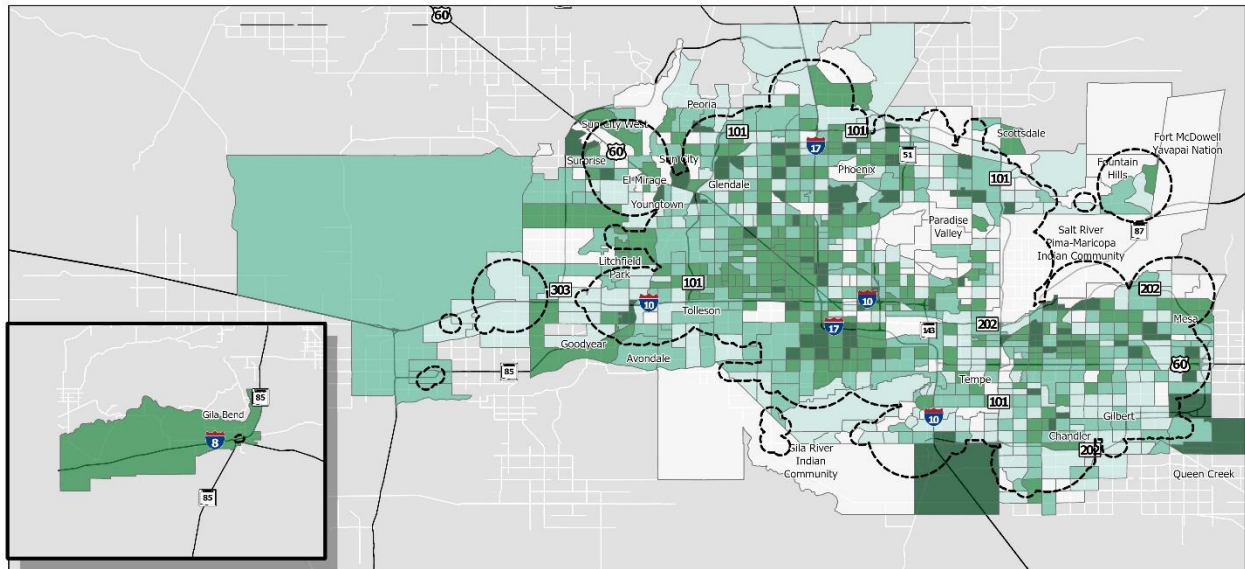


TABLE 4: 2019 ACS DATA, BY LANGUAGE WITHIN ONE-HALF MILE OF FIXED ROUTE SERVICE

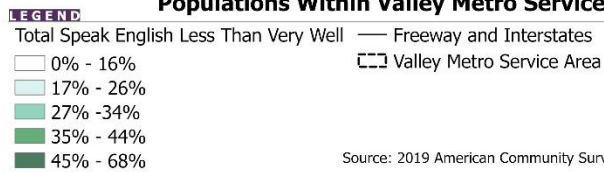
Language	Speak English		Total Population	Percentage of Language LEP of Total LEP Population
	Less Than Very Well	Very Well		
All languages	335,714	—	—	100
Spanish	261,287	527,642	788,929	77.83
French, Haitian or Cajun	2,115	7,666	9,781	0.63
German	988	9,765	10,753	0.29
Russian, Polish or Other Slavic	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.

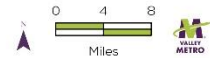
FIGURE 4: POPULATION SPEAKING ENGLISH “LESS THAN VERY WELL”



Populations Within Valley Metro Service Area That Speak English Less Than Very Well



Source: 2019 American Community Survey





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:

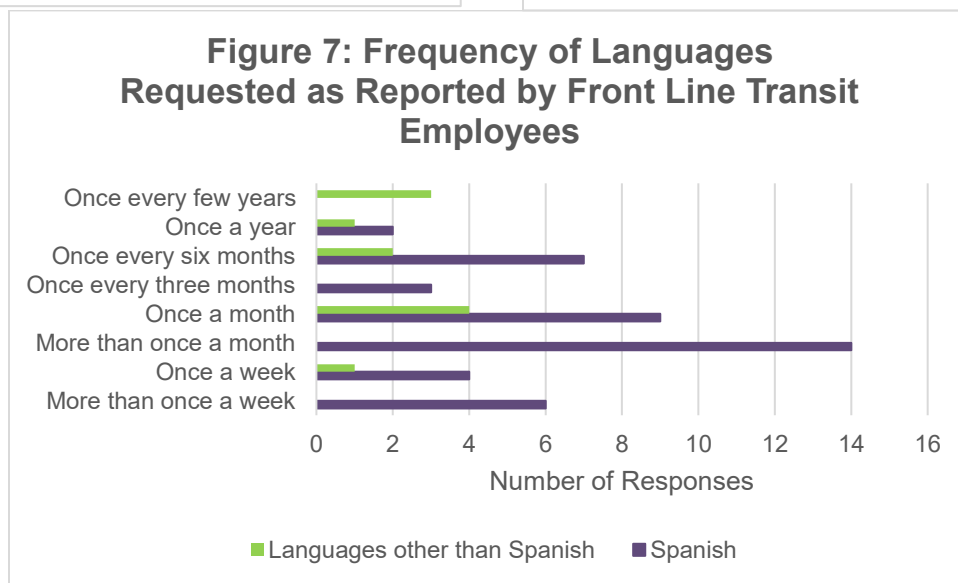
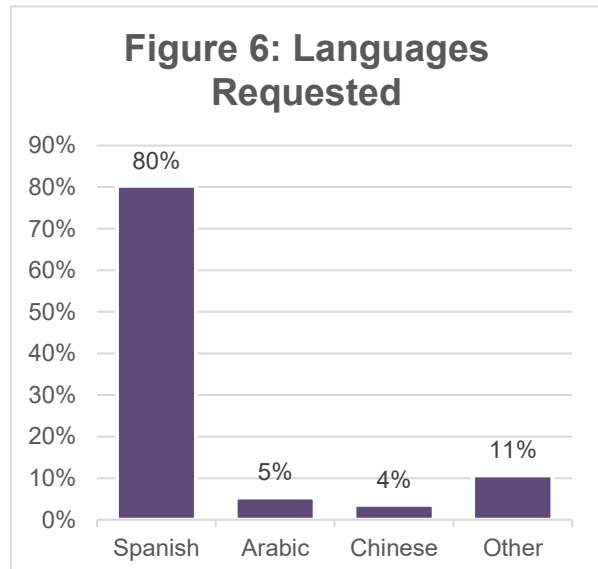
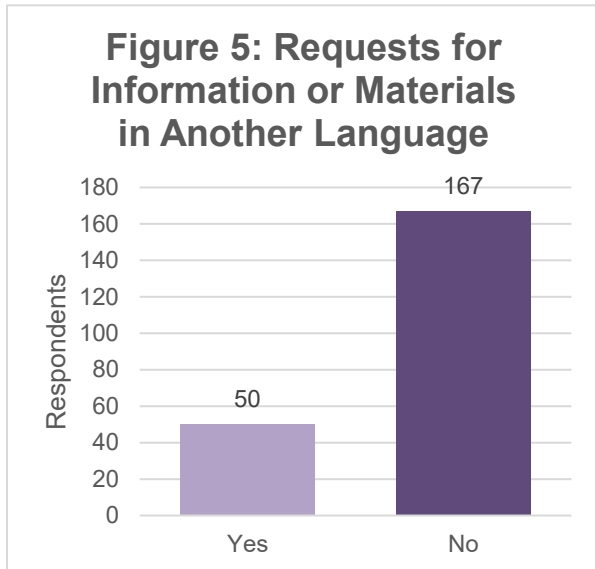
- Customer Service and Mobility Center
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center
- East Valley Bus Operations and Maintenance Facility
- Mesa Bus Operations and Maintenance Facility
- Phoenix Bus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

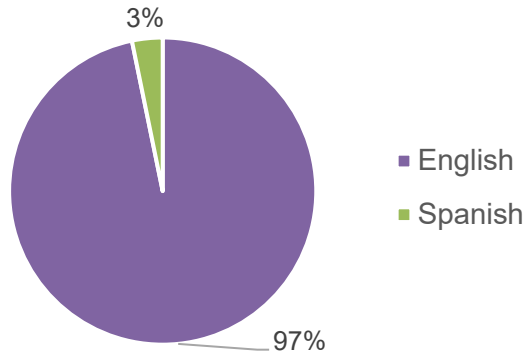
TABLE 7: 2019 CUSTOMER SERVICE CALL LOG

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.

Figure 8: Customer Service Calls by Language



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



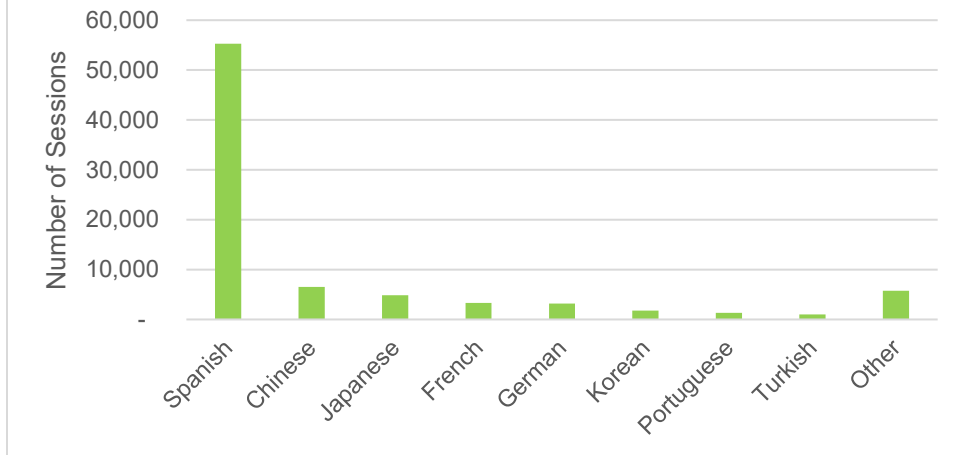
in 2019. Note that only those languages accounting for at least 0.01 percent of the total sessions are included; a full table of entries is available in **Appendix B**.

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.

Figure 9: Number of Translated Website Session by Language (Excluding English)



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
- Finnish
- 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:

-
- Route Scout (announcements on buses and light rail)
 - Ride Guide and Destinations Guide
 - Service changes materials
 - Transit Book
 - Website
 - COVID-19 updates
 - Project updates
 - Title VI forms
 - Large special events materials (for example, Super Bowl public materials)
- Direct mailers or door hangers for targeted outreach
 - Ticket vending machines (Spanish and Braille)
 - Bilingual customer service staff
 - Email list messages
 - Bus specific services:
 - Car cards (on-board advertisements)
 - Bus signage (priority seating, caution signs, entry/exit, etc.)
 - Variable message sign (VMS)² that displays audio announcements on buses
 - Light Rail specific services:
 - Light rail transit vehicle signage including priority seating, code of conduct, and other train information
 - VMS³ announcements on vehicles and at stations
 - System maps and auxiliary information
 - Operator call boxes on trains
 - Emergency call box at stations
 - Safe place notices

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.

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



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 on 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 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.

Language Assistance Plan

07/22/2021

Page 33



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

Language Assistance Plan

07/22/2021

Page 35



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?

Language Assistance Plan

07/22/2021

Page 37



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

Language Assistance Plan

07/22/2021

Page 41



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

Section 2.8 Membership of Non-Elected Committees and Councils

Pursuant to 49 CFR Section 21.5 (b)(1)(vii) and the requirements set forth in FTA C 4702.1B, the City of Phoenix maintains a list depicting the racial breakdown of the membership of its transit-related non-elected planning boards, advisory councils and committees. The boards, councils, and committees are as follows:

- i) City of Phoenix Citizens Transportation Commission (CTC)
- ii) Valley Metro Accessibility Advisory Group (VMAAG)

Description of Efforts Made to Encourage Minority Participation

- i) City of Phoenix Citizens Transportation Commission (CTC)

The purpose of the City of Phoenix CTC is to ensure accountability. T2050 requires a 15-member Citizens Transportation Commission to represent various facets of the community and oversee the plan. The committee addresses street and transit needs, provides oversight on the expenditure of funds, and make recommendations on plan elements and other means of generating revenue for the plan going forward.

The CTC meets once a month for the General Assembly Committee meeting. Every board member is appointed by City of Phoenix elected officials. To fill seats The Mayoral appointees, represent education communities, business communities, disability communities, transit user representative and a transportation expert. City of Phoenix Council represents eight council districts with one elected council member for each district. The CTC has one commissioner appointed by a council member of each of the city’s eight council districts.

The Public Transit Department’s Directors office serves as the board secretary and works directly with the Mayor’s Office and Councilmembers prior to candidate consideration. Public Transit Department staff will encourage minority participation for vacant Commissioner appointments by contacting the Mayor and/or Councilmembers and providing a letter of encouragement (figure 1) prior to candidate selections being made.

TABLE 1: CITY OF PHOENIX CITIZEN TRANSPORTATION COMMISSION (CTC)

Body	African American	Asian American	Caucasian	Latino	Native American	Non-disclosed
Citizen’s Transportation Commission	1	0	6	4	0	4
Population	7%	0%	43%	21%	0%	29%

FIGURE 1: MINORITY ENCOURAGEMENT LETTER



City of Phoenix
PUBLIC TRANSIT DEPARTMENT

DATE

City of Phoenix Councilmember
200 W. Washington St.
Phoenix, AZ 85003

Re: Appointment to Citizens Transportation Commission

Dear Mayor or Councilmember:

With the recent departure of Commissioner *NAME*, I am reaching out to request your assistance to appoint a new commissioner to represent your office/district on the Phoenix's Citizens Transportation Commission (CTC).

When Phoenix voters approved the Phoenix Transportation 2050 plan in 2015, they also approved the creation of the CTC to provide transparency and oversight of the plan. The CTC accomplishes these goals by working with city staff on the plan, providing input and direction, and ultimately providing recommendations on the plan's progress to the Phoenix City Council. Your decision on the next CTC commissioner will play an important role in how the T2050 plan continues to be implemented.

As you consider this important decision, please keep in mind that your appointee not only represents your office, but also the residents of *Phoenix/District #*, which is why I would like to remind you that the consideration of all candidates, especially those who represent the various communities of Phoenix, be considered in your decision-making process.

Of note, as federal recipient, the city of Phoenix Transit Department adheres to the Federal Transit Administration's (FTA) requirements and guidelines in order to maintain good standing. The FTA's Circular 4702.1B, Title 49 CFR Section 21.5(b)(1)(vii) addresses minority representation on planning and advisory Bodies. As a result, the department provides racial information of the CTC with the FTA, as well as a description of efforts made to encourage the participation of minorities on the CTC.

If you have questions, or I can assist with your decision, please reach out anytime.

Sincerely,

FROM NAME
FROM TITLE

c: Transit Director
Deputy City Manager
Transit Federal Oversight Staff

ii) Valley Metro Accessibility Advisory Group (VMAAG)

The purpose of Valley Metro’s Accessibility Advisory Group is to offer insight, feedback and understanding by advising Valley Metro staff about products and services.

The VMAAG meets once a month. VMAAG members best reflect the geographic, gender, ethnic and disability diversity of the Metro Phoenix area. This 15-member group consists of Maricopa County residents who meet any of the following criteria: A senior age 65 or older, a person with a disability, a caregiver for a senior or person with disability, an employee or volunteer for an organization which serves seniors or people with disabilities. VMAAG member terms last for two years and may be reappointed for up to two additional terms. Valley Metro will recruit for open membership positions in the event of a vacancy and vacancies are posted on VMAAG advisory group webpage along with an application for any interested person.

TABLE 2: VALLEY METRO ACCESSIBILITY ADVISORY GROUP (VMAAG)

Representative	Term Expiration	Terms Remaining	Race/Ethnicity
Kathryn Chandler	6/30/2022	0	Non-disclosed
John Federico	6/30/2022	0	Caucasian
Katie Griffith	6/30/2023	0	Non-disclosed
Mary Hartle	12/14/2022	2	Caucasian
Randall Kidd	7/1/2023	2	Caucasian
Howard May	6/30/2023	0	Non-disclosed
Catherine Morgan	7/1/2023	2	Caucasian
Jean Moriki	6/29/2022	1	Hispanic/Latino
Michelle Stokes	12/14/2022	2	Caucasian
Kyle Straight	7/1/2023	2	Caucasian
Toni Young	7/24/2022	2	Caucasian

Section 2.9 Determination of Site or Location of Facilities

Since the last Title VI Program submission in 2018, The City of Phoenix Public Transit Department has not selected a site for a facility meeting the applicable definitions under Title VI, and thereby did not need to conduct an equity analysis.

In determining the site or location of facilities, the City will not make selections with the purpose or effect of excluding persons from, or denying benefits of, or subjecting them to discrimination with regard to race, color or national origin following the guidance provided in the Circular 4702.1B, Chapter III, Section 13 – Determination of Site or Location of Facilities.

According to FTA Circular 4702.1B for facilities covered by this provision, The City of Phoenix is required to:

- Complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, The City of Phoenix must consider and analyze reasonable, feasible, and prudent alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

CHAPTER 3: SUBRECIPIENT MONITORING

In accordance with FTA Circular 4702.1B, the City of Phoenix is committed to ensuring that we distribute FTA funding without regard to race, color, or national origin and that our subrecipients are also in compliance with FTA Title VI regulations. The City of Phoenix is dedicated to ensuring subrecipients comply with FTA Title VI regulations.

Section 3.1 Program Overview of Subrecipient Monitoring

The City of Phoenix currently oversees approximately 60 subrecipients. Due dates for triennial Title VI Program plan submission are assigned on a rolling cycle basis, based on subrecipient agency Board of Director program acceptance dates (see *Table 1*). The City of Phoenix operating procedures provide guidance to the Civil Rights Coordinator offering technical assistance to all subrecipients regarding oversight of FTA Title VI regulations, compliance, and general reporting. Resources include but are not limited to, training, monitoring, workshops, and technical assistance.

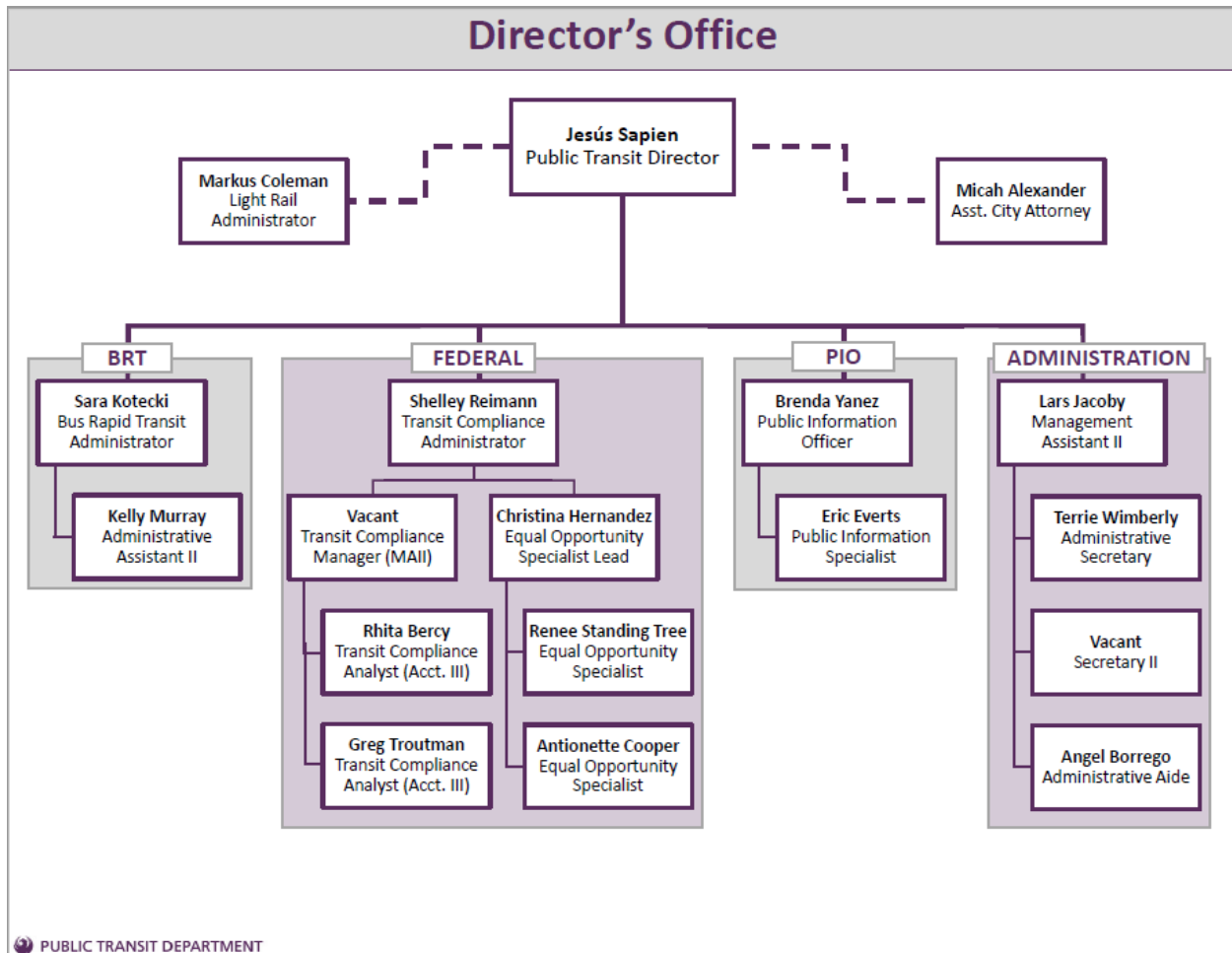
The City of Phoenix has developed a subrecipient compliance training program. Our training program consists of an annual training, one-on-one settings, workshops, webinars, and website resources to inform subrecipients of the FTA Title VI regulations which assists them with creating a Title VI implementation program plan for their organization. The City of Phoenix will provide subrecipients with assistance in the form of supplemental materials including:

- I. Subrecipients can access sample documents: Program Requirement Checklist, Program Plan Update Template, Notices to the Public, Complaint Forms, and Language Assistance Plans via our Subrecipient Resource page located at:
<https://www.phoenix.gov/publictransit/subrecipient-resources>
- II. Demographic (Census) information (if needed); and
- III. Track changes in the Subrecipient Title VI plan submission document, the City of Phoenix assists subrecipients with organizing their program updates and provide suggestions/corrections to implement prior to board approval; and
- IV. Annual Reports: The City's monitoring includes documentation of any suggested changes made to the subrecipient's Title VI Program plan. The City requires an Annual Title VI report which is due by October 15th of each year. This assists subrecipients in monitoring their public notices, websites and identify any significant changes. The City of Phoenix conducts random sampling to verify subrecipients' website is in compliance as indicated in their annual Title VI reporting summary.

Section 3.2 Compliance Team

The City of Phoenix Compliance Team is assigned under the Transit Compliance Administrator. The team is comprised of two sections Civil Rights and Oversight.

FIGURE 1: CITY OF PHOENIX PUBLIC TRANSIT DEPARTMENT/ COMPLIANCE TEAM ORG CHART



The Civil Rights Team will conduct a full review of the subrecipient's Title VI Program plan update. After a thorough review of the subrecipient's program plan submission and website, the Civil Rights Team will determine if the plan and website is compliant or noncompliant in accordance with the regulations. If the Title VI Program plan update is compliant, the Civil Rights Team will send a written Concurrence Memo along with a Program Review Assessment (FIGURE 2) informing the subrecipient of their compliance and the next triennial due date for their Title VI Program plan update. All final subrecipient Title VI Program plan updates will be stored electronically.

If the subrecipient's program plan update is not fully compliant, the City of Phoenix informs the subrecipient in writing via email and/or by phone of the deficient areas and offers technical assistance to cure the deficiencies. The City of Phoenix' goal is to work closely with subrecipients to cure deficiencies within 30 days. After several technical assistance attempts in achieving full subrecipient compliance, the Civil Rights team refers the subrecipient to the Oversight Team to assist in achieving compliance through potential desk and/or onsite reviews.

The Oversight and Civil Rights Team work in collaboration to conduct periodic discretionary reviews of grant subrecipients to ensure they honor their commitments and are compliant with program requirements. Prior to an onsite visit the Oversight Team issues a risk assessment to the subrecipient for their completion, reviews subrecipient legal and financial records, technical capacity information, asset management, maintenance, civil rights, school/charter bus, and safety. During the site visit the team inspects the subrecipient vehicle(s), facilities and records for compliance with Title VI requirements such as: Notice to the Public postings, evidence of outreach to the limited English populations identified in the subrecipient's LEP plan, the location and distribution of complaint procedures and website compliance. Once the review is complete the Oversight Team issues a Subrecipient Compliance Review Final Report detailing any corrective actions.