Copa Health, Inc.

Title VI Implementation Plan

November 2025 – October 2028

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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 authority to Latrice S. Hickman, to operate as the Title VI Program Coordinator, to oversee and ensure 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

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 complir 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 pais 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

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?	☐ Large Print	☐ Audio Tape
	☐ TDD	☐ Other

Section II:		
Are you filing this complaint on your own behalf?	☐ Yes*	☐ No
If you answered "yes" to this question, go to **Section III.*		
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.	☐ Yes	☐ No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ 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?	☐ Yes	☐ 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.

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 Valley Metro 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 <u>any</u> 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.

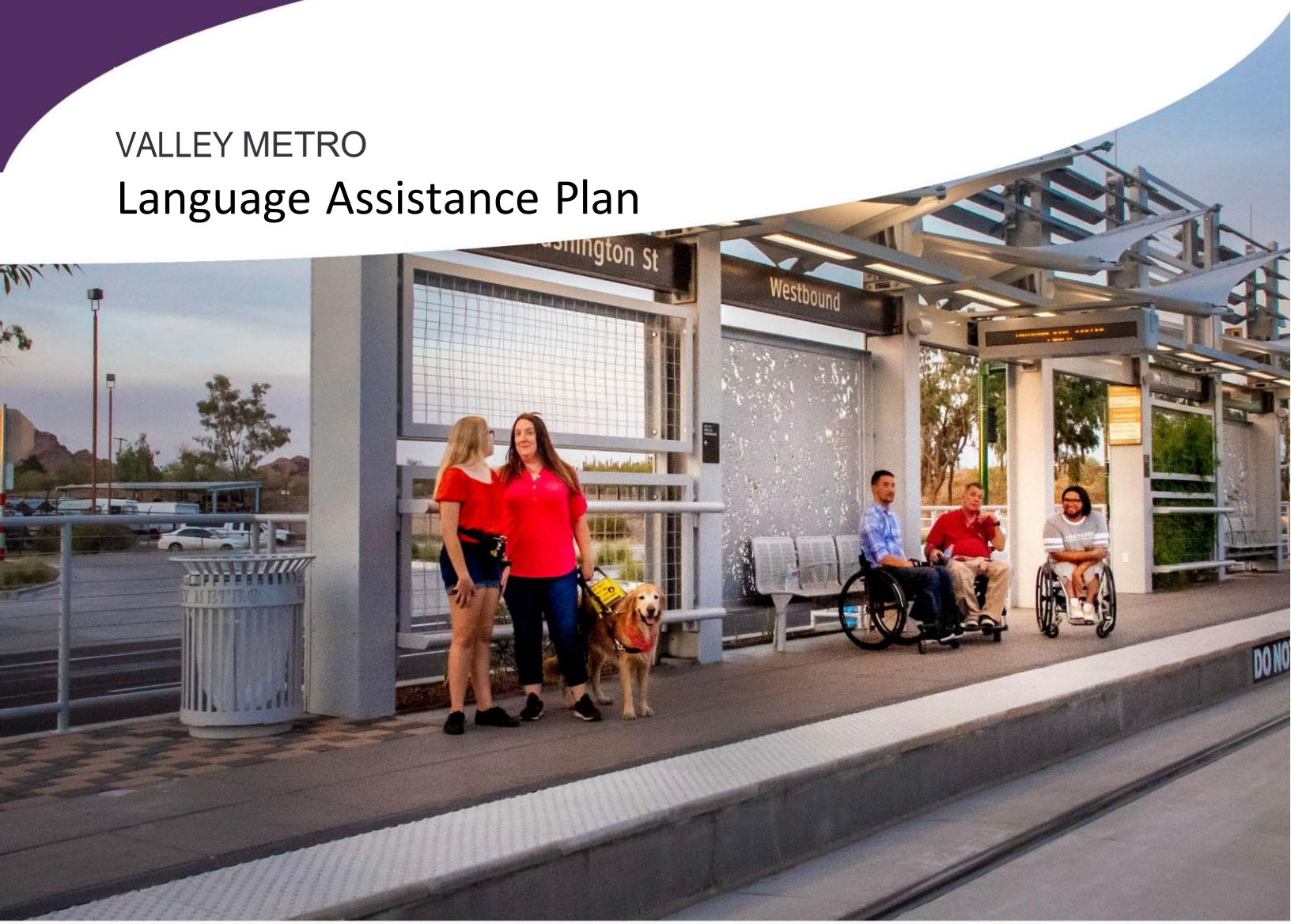
Board Approval for the Title VI Program

Copa Health, Inc. Board of Directors met November 20, 2025 to approve a resolution adopting the previous three-year program.

Consent Agenda 1. August 19, 2025 Minutes 2. Financial Statements 3. Title VI Plan Resolution (revised) 4. Policies	Secretary Don Fowls, MD presented the Consent Agenda for acceptance. No item was pulled for further discussion.	The Consent Agenda was approved as presented.

VALLEY METRO

Language Assistance Plan



AUGUST 2024

VALLEY METRO

1.0 INTRODUCTION

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

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

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

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

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

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

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

Transportation Plan. The 20-mile light rail starter line (Central Phoenix/East Valley) became operational within the cities of Phoenix, Tempe and Mesa on December 27, 2008. Since 2008, the completion of four light rail extensions have increased the length of the light rail system to 30 miles. The Mesa Dr/Main St. extension, a 3.1-mile project that brought light rail into downtown Mesa, began operations in 2015. In March 2016, the 19th Ave/Dunlap extension in Phoenix opened—adding 3.2 miles to the system. The Gilbert Road Extension, a 1.9-mile project on Main Street to Gilbert Road in Mesa, began operations in 2019. And the Northwest Phase II extension, a 1.6-mile project extending the system northwest from 19th Ave/Dunlap to Metro Center, opened in January 2024. In addition, Valley Metro and the City of Tempe opened a 3-mile streetcar project in May 2022, running through Downtown Tempe and the Arizona State University-Tempe campus. Valley Metro and the City of Phoenix are progressing construction of the South Central Extension/Downtown Hub, a 5.5-mile extension of light rail on Central Avenue to Baseline Road, which is expected to open in mid-2025.

Valley Metro and the region support the goal of the U.S. Department of Transportation (USDOT) limited English proficient (LEP) guidance to provide meaningful access to its services by LEP persons. The Federal Transit Administration (FTA) notes that transit agencies that provide language assistance to LEP persons in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from using the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

1.1 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, 2022 American Community Survey (ACS) 5-year Sample.

2.2 LEP Population Identification

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

2.3 American Community Survey

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

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

FIGURE 1: VALLEY METRO SERVICE AREA

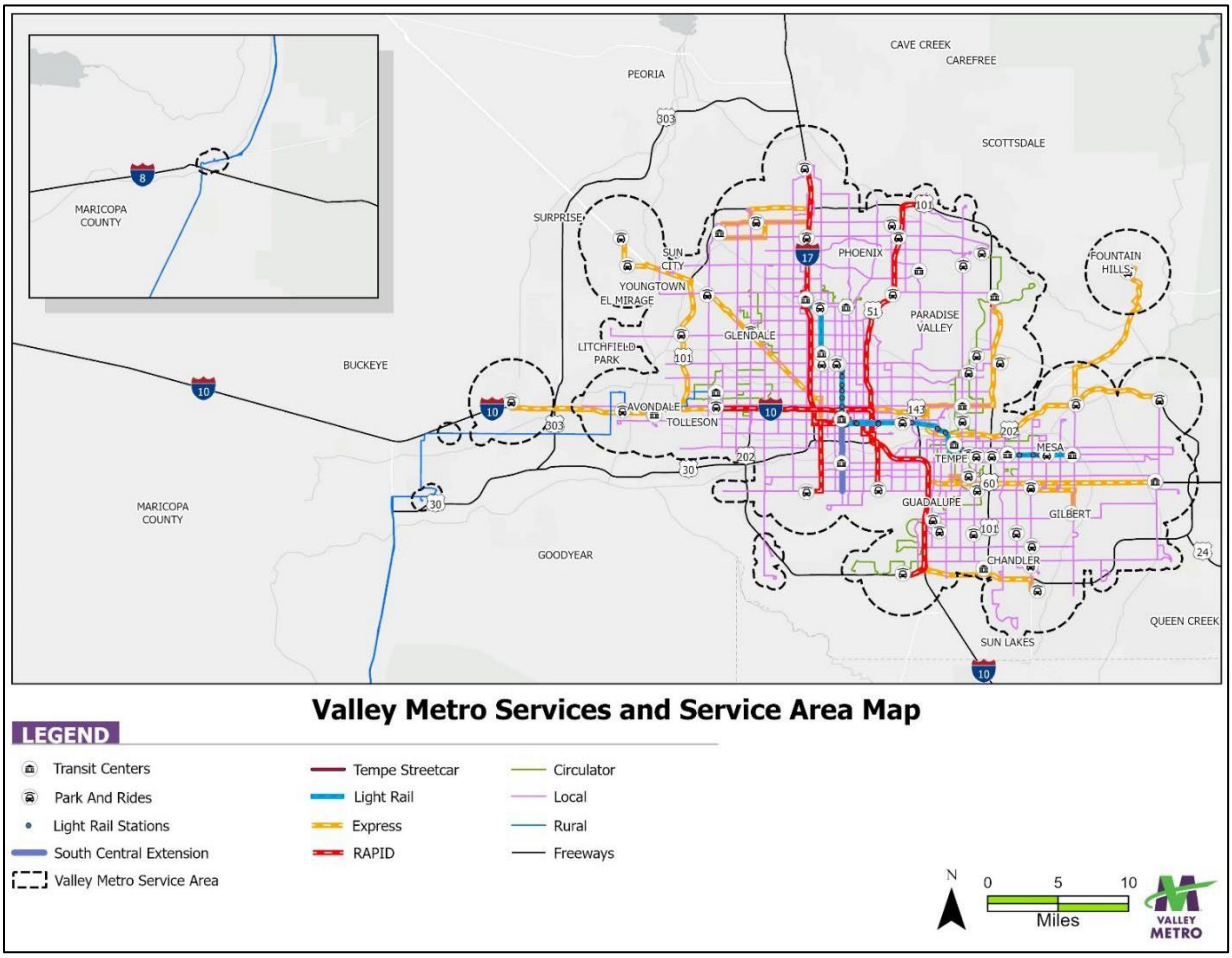


TABLE 1: 2022 ACS DATA, BY LOCATION

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

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

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

over. Indo-European, Asian or Pacific Islander, and all other languages groups account for 67,459 people, or 1.9 percent of the population. Of all those speaking English less than “very well,” the Spanish group makes up 79 percent of the total population over age five with limited English proficiency.

TABLE 2: 2022 ACS DATA, BY LANGUAGE CATEGORY

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

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

TABLE 3: 2022 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

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

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

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

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

FIGURE 2: CENSUS TRACTS WITH LINGUISTICALLY ISOLATED HOUSEHOLDS

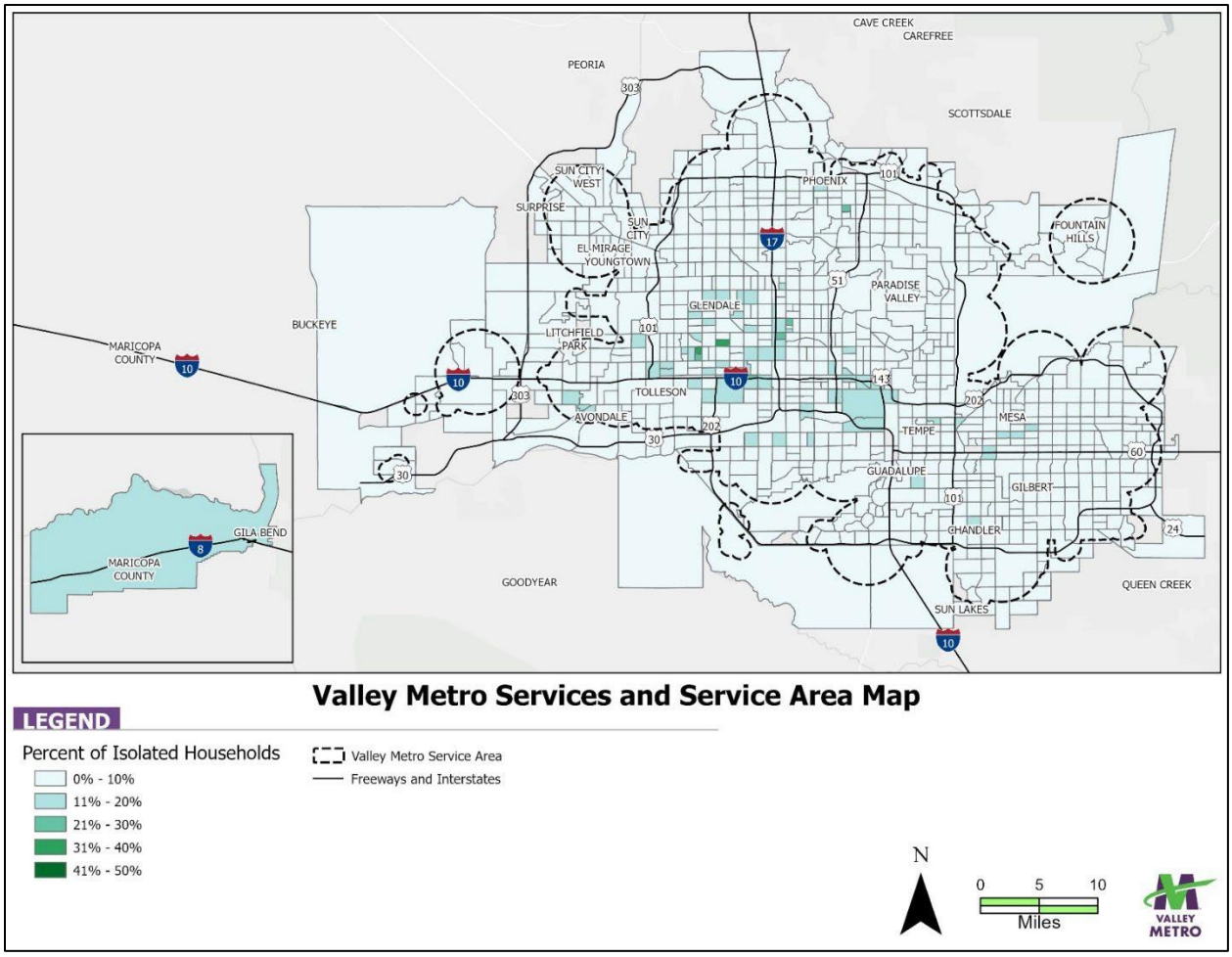
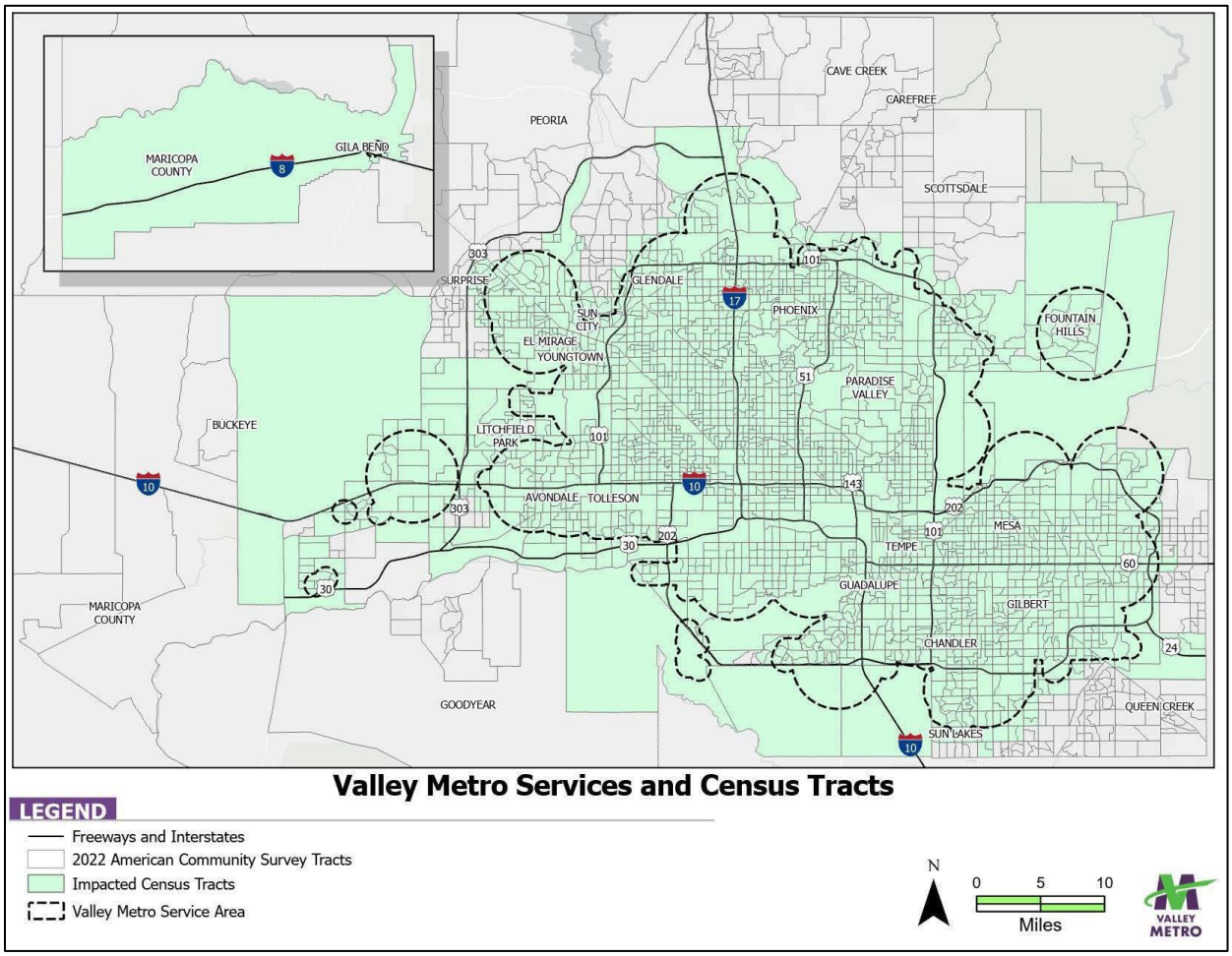


FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



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

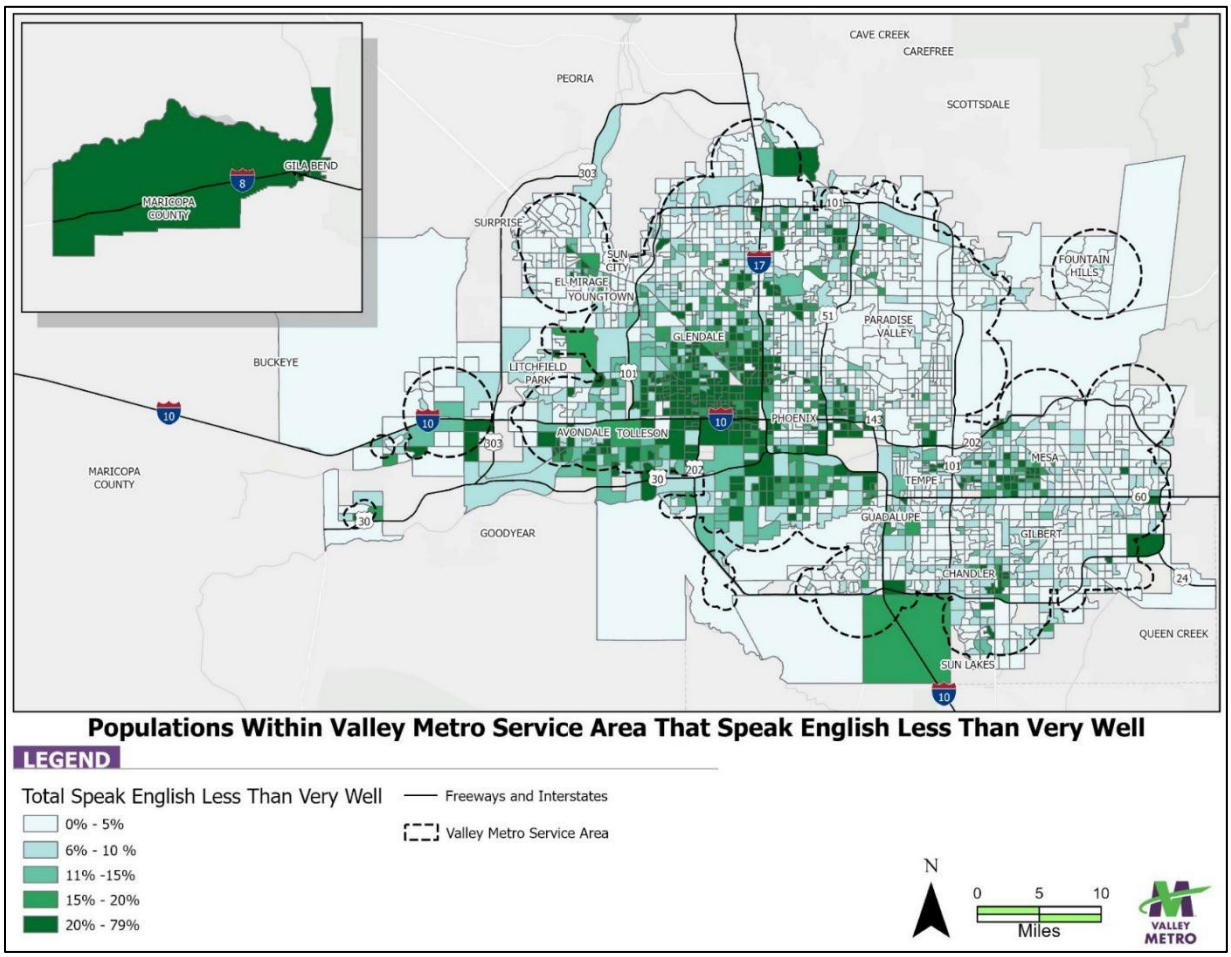
Within the service area, the majority of the 2022 LEP populations is the Spanish-speaking population; this is the only language group to exceed both 1,000 individuals and five percent of the LEP population. The Spanish LEP population consists of 251,606 individuals within the service area. The other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

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

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

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

FIGURE 4: POPULATION SPEAKING ENGLISH "LESS THAN VERY WELL"



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

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

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

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

3.1 Evaluation Methods and Data Sources

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

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

3.2 Frequency of Contact Analyses

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

Customer Service Interactive Voice Response Call Log

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

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

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

TABLE 5: 2022 CUSTOMER SERVICE CALL LOG

Call	Total Calls	% of Total Calls
ADA – English	328	0.38
ADA – Spanish	934	1.08
CR – English	8,522	9.89
CR – Spanish	135	0.15
Light Rail – English	8	0.01
Light Rail – Spanish	0	0.00
Lost and Found – English	259	0.30
Lost and Found – Spanish	0	0.00
TI – English	69,124	80.28
TI – Spanish	6,685	7.76
English (Total)	78,339	91.00
Spanish (Total)	7,754	90.99
Total Calls	**86,095**	**100.00**

FIGURE 5: CUSTOMER SERVICE CALLS BY LANGUAGE

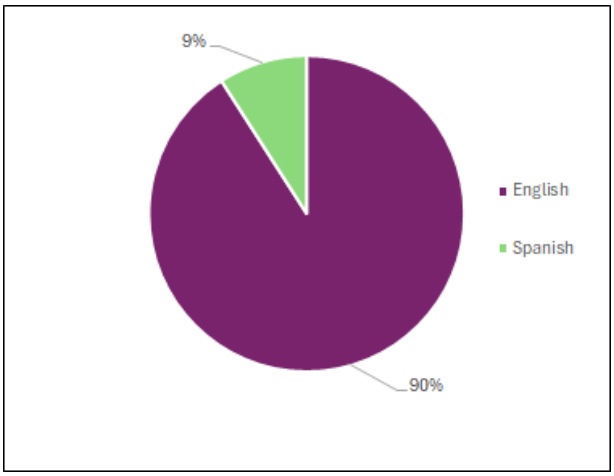


Figure 5 shows a pie chart of the calls by language. Approximately 90 percent of calls were for English and nine percent of calls were for Spanish. At the time of this report, 24 Customer Service representatives were on staff; of these, six were bilingual (25 percent).When evaluating the Customer Service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

Transit Education Program

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

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

groups, the hosting organizations would generally provide the necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help bridge the language issues.

Website Translation

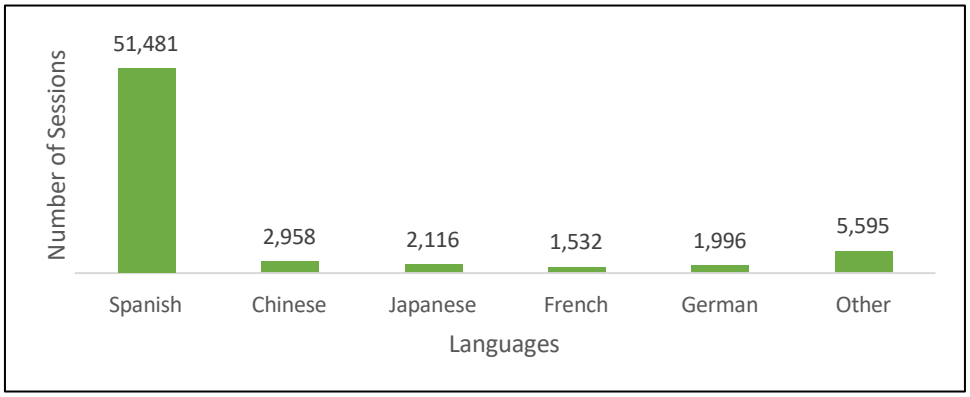
Apart from accessing information from transit employees—whether by phone, email, in person or another method—many customers use the www.valleymetro.org website for information. The website is equipped with the Google Translate feature, which allows translation into over 100 languages. As of 2024, users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

TABLE 6: 2022 WEBSITE SESSIONS, BY LANGUAGE

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

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

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



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

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

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

Conclusion

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

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

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

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

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

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

4.1 Services Provided

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

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

    - Title VI forms
    - Large special events materials (for example, Super Bowl public materials)
- Direct mailers or door hangers for targeted outreach
- Ticket vending machines (Spanish and Braille)
- Bilingual Customer Service staff
- Email list messages
- Bus-specific services:
    - Car cards (on-board advertisements)
    - Bus signage (priority seating, caution signs, entry/exit, etc.)
    - Variable message sign (VMS)[6] that displays audio announcements on buses
- Light rail-specific services:
    - Light rail transit (LRT) vehicle signage, including priority seating, code of conduct, and other train information
    - VMS[1] announcements on vehicles and at stations
    - System maps and auxiliary information
    - Operator call boxes on trains
    - Emergency call box at stations
    - Safe place notices

4.2 Critical Services

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

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

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

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

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

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

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

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

5.1 Current Measures and Costs

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

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

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

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

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

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

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

5.2 Cost-effective Practices

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

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

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

5.3 Additional Services and Budget Analysis

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

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

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

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

5.4 Projected Costs

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

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

6.0 LANGUAGE ASSISTANCE MEASURES

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

6.1 Current Language Assistance Measures

Spanish Language Assistance

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

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

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

Languages Other Than Spanish

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

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

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

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

6.2 Staff Training

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

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

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

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

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

6.3 Future Language Assistance Services

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

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

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

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

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

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

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