

CITY COUNCIL REPORT



Meeting Date: February 5, 2019
 General Plan Element: ***Community Mobility***
 General Plan Goal: ***Provide for the safe, efficient, and affordable movement of people and goods***

ACTION

Title VI Program for Transit Services: City Council approval of 2019 Scottsdale Title VI program update for Transit Services.

Background

City of Phoenix is the designated recipient of Federal funds for the region. City of Scottsdale is a sub-recipient of Federal funds from Phoenix, and has used the funds for providing service, purchasing vehicles, and constructing transit facilities. As a sub-recipient, Scottsdale is required to submit an updated Title VI program for transit services to the City of Phoenix every three years. Scottsdale previously submitted a Title VI update to City of Phoenix in 2015 signed by the Scottsdale City Manager at the time.

Federal rule requires Title VI Programs and updates to be approved by City Councils and signed by City Managers. In the Program and each update, Sub-recipients are required to:

- Take reasonable actions to ensure that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color or national origin as per Title VI of the Civil Rights Act of 1964, Section 601
- Identify and address as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority and low-income population as per Executive Order 12898

City of Scottsdale uses Federal funding to provide its trolley services using City-owned vehicles through an operational contract with RTW Management. The City of Scottsdale strives to provide equal access to all of its transportation services for everyone.

There are seven elements in the 2019 Title VI Program update; each is described below:

- Notice to the Public
- Complaint Form
- Investigations, Complaints and Lawsuits
- Public Participation Plan

- Limited English Proficiency Plan
- Equity Analysis
- Fixed Route Transit Provider Analysis

Valley Metro and City of Phoenix developed their updated Title VI reports, and they were approved by their respective Board and Council. City of Scottsdale proposes to adopt sections of the Valley Metro Plan. City of Phoenix and Valley Metro provide local and express service within the City of Scottsdale.

Notice to Public

Attachment A: Title VI Notice to Public. This notice is posted in both English and Spanish on the City's website and in public areas within the City. If information is needed in another language, citizens can contact the call center at 480-312-3111.

Complaint Form

Attachment B: Title VI Complaint Form that will be available on the City's website as well as in the City of Scottsdale Transportation Department office. While use of the complaint form is encouraged, any format would be accepted provided all the necessary information has been included. A formal complaint must be filed within 180 days of the alleged occurrence.

Title VI Complaint Procedures, Complaints and Lawsuits

Title VI plan for the City describes the citizen complaint process for reporting instances of discriminatory behavior that are believed to be based on race, color, or national origin. Complainants have the option of filing a complaint through the Regional Customer Service Call Center (operated by Valley Metro), directly to the City of Scottsdale, or to an outside or state agency. The Transportation Department keeps records of all investigations, complaints and lawsuits from resolution to case closure.

Public Participation Plan

The Transportation Department works with a City Council appointed advisory Transportation Commission. The Commission has monthly meetings at which the public is invited to make either generic transit comments or comments specific to any transit project, route, or other transit-related issue. Also, throughout the year Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes and other transit related events. Although the public participation methods and extent may vary with the type of the plan or program and/or service under consideration as well as the resources available, a concerted effort to involve all affected parties is conducted to comply with Federal regulations.

Limited English Proficiency Plan

Title VI of the Civil Rights Act and Executive Order 13166 (2000), also defines the need to include persons with Limited English Proficiency (LEP) in the provision of full transit access. By Federal definition, an LEP person is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English. The City is obligated to perform a four-

factor LEP analysis which considers the following:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- The frequency with which LEP individuals come in contact with the program.
- The nature and importance of the program, activity, or service provided by the recipient to people's lives.
- The resources available to the recipient and costs.

Valley Metro conducted the four factor LEP analysis for the Phoenix Metropolitan Area. City of Scottsdale adopted Valley Metro's LEP Plan for this update.

Title VI Equity Analysis

City of Scottsdale is required to perform a Title VI Equity Analysis during the planning stage where land is acquired to construct certain facilities. "Facilities" in this context does not mean bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers. City of Scottsdale did not build any facilities in the last three years nor are there any plans to construct any facilities in the foreseeable future.

Fixed Route Transit Provider Analysis

As per FTA C4702.B, agencies that are located in an urbanized area of 200,000 or more in population and operate more than 50 or more fixed route vehicles in peak service are required to set system-wide standards, collect and report data, evaluate service and fare equity and monitor transit service.

Although the City has more than 200,000 in population it only operates 21 vehicles. As a result, City of Scottsdale is only obligated to set system wide standards and policies, and not required to collect and report data, evaluate service and fare equity, and monitor transit service.

ANALYSIS & ASSESSMENT

Policy Implications

Transit supports City Council Critical Objective C: "Provide for the safe, efficient, and affordable movement of people and goods".

Community Involvement

The 2019 Title VI program was developed in collaboration with Valley Metro and City of Phoenix. This plan is developed in conformance with the Federal Transit Administration guidance and regulations. Valley Metro and the City of Phoenix provide public information and public outreach related to transit services. Any significant changes to transit service levels require public notifications and hearings, per FTA requirements.

Valley Metro and City of Phoenix developed their 2018 Title VI reports and they were approved by their respective Board and Council. Both agencies provide local service within the City of Scottsdale,

and Valley Metro provides express service in Scottsdale.

RESOURCE IMPACTS

Available funding

Valley Metro provides the majority of public outreach for regional transit services and those expenses are paid through Regional Sales Tax Revenues. The City conducts public outreach for the trolley routes and prepares brochures which are paid by Transportation Privilege Tax. For the October 2018 major transit service changes, the City transportation department conducted extensive public outreach in addition to the public outreach done by Valley Metro.

Staffing, Workload Impact

Administration of the Title VI program is in the transit group’s annual work plan and requires no additional staffing.

Future Budget Implications

Funding for the City’s transit services comes from the Transportation Privilege Tax, Proposition 400 sales tax, Federal grants, and passenger fares. Budget authorizations are requested annually. This program has no budget implications unless a claim is filed that requires assistance from the City Attorney office.

OPTIONS & STAFF RECOMMENDATION

Recommended Approach

Adopt Resolution No. 11366 and approve the 2019 Title VI program for Transit Services

RESPONSIBLE DEPARTMENT(S)

Transportation Department – Transportation Planning and Transit Operations

STAFF CONTACT(S)

Ratna Korepella, Principal Transit Planner
480-312-7630, Rkorepella@scottsdale.gov

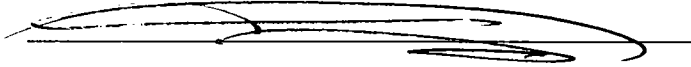
APPROVED BY

Paul Basha

Paul Basha, Transportation Director
Transportation Department
480-312-7651, Pbasha@scottsdaleaz.gov

15 January 2019

Date



Jim Thompson, City Manager
(480) 312-2811, jthompson@scottsdaleaz.gov

Date

ATTACHMENTS

1. Attachment A - Title VI Notice to Public
2. Attachment B - Title VI Complaint Form
3. Resolution No. 11366
4. 2019 Title VI Program for Transit Services



**Notifying the
Public of Rights
under
Title VI**

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

For more information on the City of Scottsdale's civil rights program, and the procedures to file a complaint, contact Ratna Korepella at rkorepella@scottsdaleaz.gov or 480-312-7630, (TTY 480-312-3111) or visit our administrative office at 7447 E. Indian School Road, Suite 205, Scottsdale, AZ. For more information, visit www.scottsdaleaz.gov

OR

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

OR

Valley Metro

101 N. 1st Ave., Suite 1300
Phoenix, AZ 85003

OR

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 480-312-3111.



**Aviso al
Publico Sobre
los Derechos
Bajo el Titulo VI**

City of Scottsdale (*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 City of Scottsdale 's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Ratna Korepella rkorepella@scottsdaleaz.gov or 480-312-7630, (TTY 480-312-3111) o visite nuestra oficina administrativa en 7447 E. Indian School Road. Para obtener más información, visite www.scottsdaleaz.gov

OR

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

OR

Valley Metro

101 N. 1st Ave., Suite 1300
Phoenix, AZ 85003

OR

FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

Para información en Español llame: 480-312-3111.

TITLE VI COMPLAINT FORM

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

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at (602) 253-5000/TTY: (602) 251-2039, or email at csr@valleymetro.org.

Section I: Customer Information

Name:		
Address:		
City:	State:	Zip:
Work Phone:	Home Phone:	Cell Phone:
Email Address:		

Section II: Incident Information

Date of Incident:	Time of Incident:	AM/PM	City:		
Incident Location:		Direction of Travel:			
Route #:	Bus/Light Rail #:				
Service Type:	<input type="checkbox"/> Local	<input type="checkbox"/> Express/RAPID	<input type="checkbox"/> Light Rail	<input type="checkbox"/> Circulator/Connector	<input type="checkbox"/> Dial-a-Ride

Operator Name:
Operator Description:

What was the discrimination based on? (Check all that apply)

Race Color National Origin Other:

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

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

If yes, please provide information about a contact person at the Federal Transit Administration where the complaint was filed.

Name:	Title:
Address:	Telephone:

Have you previously filed a Title VI complaint with this agency: Yes No

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature Date

Attachment B

602.253.5000
TTY: 602.251.2039
valleymetro.org
Attachment 2



RPT2143

RESOLUTION NO. 11366

A RESOLUTION OF THE COUNCIL OF THE CITY OF SCOTTSDALE,
MARICOPA COUNTY, ARIZONA AUTHORIZING ADOPTION OF THE CITY'S
2019 TITLE VI PROGRAM FOR TRANSIT SERVICES

WHEREAS, as a recipient of federal transit funds the City is required to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin in programs or activities that receive federal financial assistance; and

WHEREAS, the City is required to submit a Title VI program update every three years to the City of Phoenix, which is the designated recipient of federal transit funds for the region.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Scottsdale as follows:

Section 1. That the City Council authorizes adoption of the document titled "2019 Title VI Program for Transit Services."

PASSED AND ADOPTED by the City Council of the City of Scottsdale, Maricopa County, Arizona this ____ day of _____, 2019.

CITY OF SCOTTSDALE, an Arizona
municipal corporation

W. J. "Jim" Lane, Mayor

ATTEST:

Carolyn Jagger, City Clerk

APPROVED AS TO FORM:



Bruce Washburn, City Attorney
By: William Hylen, Senior Assistant City Attorney

2019 Title VI Program for Transit Services

(Effective February 5, 2019 to February 4, 2022)



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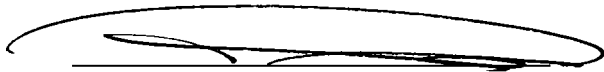
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Title VI Policy Statement

The City of Scottsdale 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, national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any City of Scottsdale sponsored program or activity. There is no distinction between the sources of funding.

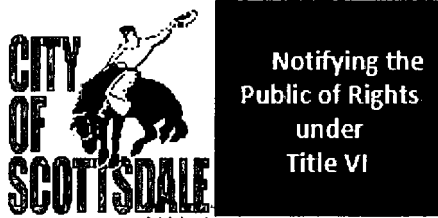
City of Scottsdale also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, City of Scottsdale will take reasonable steps to provide meaningful access to services for persons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

When City of Scottsdale distributes Federal-aid funds to another entity/person, City of Scottsdale will ensure all sub recipients fully comply with City of Scottsdale Title VI Nondiscrimination Program requirements. The Transportation Director has delegated the authority to Ratna Korepella, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Jim Thompson, City Manager

Figure 1 –Title VI Notice to Public



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

For more information on the City of Scottsdale's civil rights program, and the procedures to file a complaint, contact Ratna Korepella at rkorepella@scottsdaleaz.gov or 480-312-7630, (TTY 480-312-3111) or visit our administrative office at 7447 E. Indian School Road, Suite 205, Scottsdale, AZ. For more information, visit www.scottsdaleaz.gov

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OR
Valley Metro

101 N. 1st Ave., Suite 1300
Phoenix, AZ 85003

OR

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 480-312-3111.



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Para obtener más información sobre la City of Scottsdale 's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Ratna Korepella rkorepella@scottsdaleaz.gov or 480-312-7630, (TTY 480-312-3111) o visite nuestra oficina administrativa en 7447 E. Indian School Road. Para obtener más información, visite www.scottsdaleaz.gov

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OR
Valley Metro

101 N. 1st Ave., Suite 1300
Phoenix, AZ 85003

OR

FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

Para información en Español llame:
480-312-3111.

The above Title VI public notice is posted at the following locations:

One Civic Center, 7447 E. Indian School Road, Scottsdale, AZ, 85251

City Hall, 3700 N.75th St, Scottsdale, AZ, 85251

Civic Center Library, 3839 N. Drinkwater Blvd, Scottsdale, AZ 85251

Arabian Library, 10215 E. McDowell Mountain Ranch Road, Scottsdale, AZ 85255

Mustang Library, 10101 N.90th Street, Scottsdale, AZ 85288

Granit Reef Community Center, 1700 N. Granite Reef Rd, Scottsdale, AZ 85257

Vista Del Camino, 7700 E. Roosevelt St, Scottsdale, AZ 85257

Paiute Community Center, 6535 E. Osborn Road, Scottsdale, AZ 85251

Via Linda Community Center, 10440 E. Via Linda, Scottsdale, AZ

Scottsdale Park and Ride, Scottsdale Rd and Thunderbird Dr, SE corner

Western museum, 3830 N. Marshall Way, Scottsdale, AZ 85251

Skysong Transit Center, 1475 N. Scottsdale Road, Scottsdale, AZ 85257

Scottsdale community college, 9000 E. Chaparral Road, Scottsdale, AZ 85256

This notice is posted online at

<https://www.scottsdaleaz.gov/Assets/ScottsdaleAZ/Transportation/Right-Title-VI.pdf>



Title VI Complaint Procedures

The City of Scottsdale provides transit service through contracts with Valley Metro (Regional Public Transit Authority), City of Phoenix and RTW Management. Valley Metro and City of Phoenix provide local and express service for the City of Scottsdale. RTW Management provides Circulator City Service using City of Scottsdale owned vehicles. The City is a beneficiary of Federal Transit Administration (FTA) grant funds to provide service, purchase vehicles, and transit facilities. As a recipient of federal funding, Scottsdale take's reasonable actions to ensure access to transit programs and services.

Customers have the option of filing a complaint with City of Scottsdale, Valley Metro, City of Phoenix Public Transit Department or the Federal Transit Administration. All Title VI complaints related to the transit service in Scottsdale are logged in to Customer Assistance System (CAS) managed by Valley Metro. Figure 2 and Figure 3 show Valley Metro complaint forms in English and Spanish. Online fillable complaint form in both English and Spanish is available at <https://www.valleymetro.org/form/title-vi-complaint-form>.

Each complaint related to Title VI discrimination based on race, color or national origin is automatically entered into a Title VI complaint log and given a case number. Throughout the process the log tracks the incident date, primary complaint category and subcategory, resolution and close date.

City of Scottsdale staff logs into the program daily and works with the contract service provider or with the agency contracting with the service provider, to ensure an investigation is initiated and completed according to Federal standards. If a violation is found in the investigation the customer will receive a response with details of appropriate action(s) taken to remedy each problem.

City of Scottsdale adopts the 2018 Valley Metro Title VI Complaint Policy and Procedures and a copy of the document is included in **Attachment A** for reference.

Title VI Investigations, Complaints, and Lawsuits

City of Phoenix and Valley Metro operate local and express routes within the City of Scottsdale. Both agencies reported all the Title VI complaints related to City of Scottsdale in their 2018 Title VI program adopted by their respective Council and Board.

Investigation - City of Scottsdale received one (1) Title VI complaint on the Trolley Routes since April 2015. Investigation was completed, and Scottsdale attorney's office responded to the complaint in a timely manner and this complaint is closed.

Lawsuits – No Title VI lawsuits were filed

Complaints – City of Scottsdale received one (1) Title VI complaint

Figure 2 Complaint Form (English Version)

TITLE VI COMPLAINT FORM

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

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at (602) 253-5000/TTY: (602) 251-2039, or email at csr@valleymetro.org.

Section I: Customer Information					
Name:					
Address:					
City:	State:	Zip:			
Work Phone:	Home Phone:	Cell Phone:			
Email Address:					
Section II: Incident Information					
Date of Incident:	Time of Incident:	AM/PM	City:		
Incident Location:	Direction of Travel:				
Route #:	Bus/Light Rail #:				
Service Type:	<input type="checkbox"/> Local	<input type="checkbox"/> Express/RAPID	<input type="checkbox"/> Light Rail	<input type="checkbox"/> Circulator/Connector	<input type="checkbox"/> Dial-a-Ride
Operator Name:					
Operator Description:					
What was the discrimination based on? (Check all that apply)					
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other:					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Have you filed this complaint with the Federal Transit Administration? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide information about a contact person at the Federal Transit Administration where the complaint was filed.	
Name:	Title:
Address:	Telephone:

Have you previously filed a Title VI complaint with this agency: <input type="checkbox"/> Yes <input type="checkbox"/> No	
You may attach any written materials or other information that you think is relevant to your complaint.	
Signature and date required below:	

Signature _____ Date _____

602.253.5000
TTY: 602.251.2039
valleymetro.org



Figure 3 Complaint Form (Spanish Version)

FORMA DE QUEJAS DEL TITULO VI

Cualquier persona que crea que ha sido discriminada basándose en su raza, color u origen nacional por Valley Metro o sus proveedores de servicio puede registrar una queja del Título VI con el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información necesaria para que se procese su queja. Hay formatos e Idiomas alternos disponibles si se solicitan. Llene esta forma y envíela por correo postal a o entréguela en: Regional Public Transportation Authority, 4600 E. Washington St., Suite 101, Phoenix, Arizona 85034. Usted puede comunicarse con el Servicio al Cliente llamando al (602) 253-5000/TTY: (602) 251-2039, ó por correo electrónico en csr@valleymetro.org.

Sección I: Información del Cliente			
Nombre:			
Domicilio:			
Ciudad:	Estado:	Código Postal:	
Teléfono del Trabajo:	Teléfono del Hogar:	Teléfono Celular:	
Domicilio Electrónico:			
Sección II: Información del Incidente			
Fecha del Incidente:	Hora del Incidente:	AM/PM	Ciudad:
Ubicación del Incidente:		Dirección de Viaje:	
# de Ruta:	# de Autobús/Tren Ligero:		
Tipo de Servicio:	<input type="checkbox"/> Local	<input type="checkbox"/> Express/RAPID	<input type="checkbox"/> Tren Ligero
	<input type="checkbox"/> Circulador/Connector	<input type="checkbox"/> Dial-a-Ride	
Nombre del/la Conductor/a:			
Descripción del/la Conductor/a:			
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable)			
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen Nacional	<input type="checkbox"/> Otro:
Explique tan claramente como sea posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron a usted (si los sabe), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use el reverso de esta forma.			

¿Ha usted registrado esta queja con la Administración Federal de Tránsito? <input type="checkbox"/> Sí <input type="checkbox"/> No	
Si contestó sí, por favor provea información sobre la persona de contacto en la Administración Federal de Tránsito donde se registró la queja:	
Nombre:	Título:
Domicilio:	Teléfono:
¿Ha usted registrado previamente una queja del Título VI con esta agencia?: <input type="checkbox"/> Sí <input type="checkbox"/> No	
Usted puede adjuntar cualquier material por escrito o cualquier otra información que crea que sea relevante a su queja.	

Se requieren la firma y la fecha abajo:

Firma

Fecha

valleymetro.org
602.253.5000
TTY: 602.251.2039



RPT2143

Public Participation Plan

City of Scottsdale continuously engages the public in its planning and decision-making processes, as well as its marketing and outreach activities. The City works closely with Valley Metro (Regional Public Transportation Authority) on several outreach activities throughout the year. The City also does outreach independently at senior centers, transit activity centers and other places of interest. The public is invited to participate in the process through public meetings, surveys and social media etc.

The City of Scottsdale Transportation Department also works with a City Council appointed advisory Transportation Commission. The Commission has monthly meetings at which the public is invited to make either generic transit comments or comments specific to any transit project, route, or other transit related issue.

Public meetings and hearings are held at several accessible locations within the areas with populations identified as low income, minority, LEP (Limited English Proficiency), senior, and disabled. These locations are all served by the City's circulator system and meetings are held during the hours of operation. In addition, the City strives to hold daytime meetings at the Senior Centers to reach out to individuals that otherwise would have a difficult time attending a night meeting.

The City also makes an effort to provide outreach to community groups. The Transit office also has a relationship with the City's Diversity Advisory Committee (DAC) which has grown over time since 1997. DAC holds an annual Unity Festival and Hispanic Heritage programs. The transit team, when possible, provides an information booth at DAC events.

In the last three years City of Scottsdale made the following community outreach efforts in addition to meetings Valley Metro held on a regional basis. Commission meetings and the Council meetings are televised on public access Channel 11.

- Transportation Commission Meetings Monthly
- City Council Meetings Twice a month

- Trolley Service Change Meetings
 - Public Meetings for transit service changes at various locations (Senior Centers; transit centers; community centers; major transfer points etc.)

In the upcoming year(s) City of Scottsdale will continue to hold the same level of community outreach efforts.

City of Scottsdale 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.

Valley Metro and City of Phoenix operate all the fixed route service within the City of Scottsdale. The regional transit public input/outreach process is conducted by Valley Metro for various transit related activities and actions. City of Scottsdale reviews and has endorsed the all-inclusive

public participation plans developed by Valley Metro. **Attachment B** includes a copy of Valley Metro’s current public Participation plan.

Limited English Proficiency Plan

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read speak, write or understand English. A Limited English Proficiency Plan (LEP) identifies reasonable steps to provide language assistance for the LEP population.

The U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates for the City of Scottsdale indicate the top five demographics as shown in Table 1 below.

Table 1. Demographics of Scottsdale (Top 5 Categories)

White alone	81.00%
Hispanic or Latino (of any race)	10.30%
Asian alone	4.20%
Black or African American alone	1.60%
American Indian and Alaska Native alone	0.80%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

The remaining eight percent of the population speak other languages. The language proficiency characteristics of various language groups are shown in Table 2 below.

Table 2. Language Proficiency*

Total:	229,871
Speak only English:	87.14%
Spanish:	6.19%
Speak English "very well"	4.34%
Speak English less than "very well"	1.85%
French, Haitian, or Cajun:	0.58%
Speak English "very well"	0.47%
Speak English less than "very well"	0.11%
German or other West Germanic languages:	0.59%
Speak English "very well"	0.52%
Speak English less than "very well"	0.07%
Russian, Polish, or other Slavic languages:	0.67%
Speak English "very well"	0.46%
Speak English less than "very well"	0.21%
Other Indo-European languages:	1.83%

Speak English "very well"	1.46%
Speak English less than "very well"	0.36%
Korean:	0.19%
Speak English "very well"	0.13%
Speak English less than "very well"	0.06%
Chinese (incl. Mandarin, Cantonese):	0.62%
Speak English "very well"	0.39%
Speak English less than "very well"	0.23%
Vietnamese:	0.14%
Speak English "very well"	0.03%
Speak English less than "very well"	0.11%
Tagalog (incl. Filipino):	0.20%
Speak English "very well"	0.14%
Speak English less than "very well"	0.05%
Other Asian and Pacific Island languages:	0.85%
Speak English "very well"	0.59%
Speak English less than "very well"	0.26%
Arabic:	0.60%
Speak English "very well"	0.54%
Speak English less than "very well"	0.06%
Other and unspecified languages:	0.40%
Speak English "very well"	0.34%
Speak English less than "very well"	0.07%

*Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

Scottsdale has two factors that compel the City to be proactive in meeting the needs of minority and Limited English Proficiency populations. The City's resort and tourism industry draws workers from throughout the Valley, making Scottsdale a net importer of employees, many of whom have limited English proficiency. The tourism industry also attracts thousands of international visitors who are well versed in using transit, but who do not always speak English very well. While Scottsdale's Limited English Proficiency and other minority populations appear small, the City recognizes the need to be proactive in providing better access for these populations.

The trolley system provides service to neighborhoods with the highest number of LEP persons, providing them with connections to job centers, local medical, retail, schools (elementary through college), entertainment, recreation and civic destinations. In addition, the system provides connections to local routes, express routes and light rail for travel throughout Maricopa County. These connections make the City's circulator system an important service or benefit from a health, education, economic, and safety perspective.

As indicated in Tables 1 and 2 City of Scottsdale has a significant Spanish-speaking population. A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to individuals in whatever language is requested.

Scottsdale has many resources available to help develop materials and provide translation services, including resources from Arizona State University and Scottsdale Community College. In addition, the City has its own video production, graphics, and printing facilities which have been instrumental in providing materials for meetings, vehicle notifications, and the website. The Scottsdale Trolley program has brochures available in Spanish, French, Chinese, and Russian.

Many of the trolley drivers also speak Spanish, while other City employees have been identified to lend assistance for Indian, French, Chinese, and Russian languages. These employees' volunteer translation assistance at transit public meetings when needed.

Valley Metro developed a Language Assistance Plan for the entire region. Valley Metro's plan includes details on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for plan updates. Valley Metro undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- 2) The frequency with which LEP individuals come in contact with the program.
- 3) The nature and importance of the program, activities or services provided by the recipient to people's lives.
- 4) The resources available to the recipient and costs.

Valley Metro conducted the four factor LEP analysis for the Phoenix Metropolitan Area. City of Scottsdale adopted the Valley Metro Limited English Proficiency Plan for this update. A copy of the document is attached for reference.

Safe Harbor Provision

The Federal Safe Harbor Provision requires written translations of vital documents for each LEP group that meets the threshold of 5% or 1,000 individuals, whichever is less. The City of Scottsdale complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following is made available in Spanish:

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

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

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

Non-elected Committees Membership

At present the City of Scottsdale does not collect demographic information from Transportation Commission representatives or the City Council members. In the future the Transportation Department will formalize the collection of demographic information in the selection process of the Transportation Commission.

Monitoring for Sub-Recipient Title VI Compliance

City of Scottsdale does NOT monitor sub recipients for Title VI compliance.

Title VI Equity Analysis

The City of Scottsdale has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since April 2012.

Fixed Route Transit Provider System wide Standards and Policies

Scottsdale monitors service provided by its individual service providers: City of Phoenix, Valley Metro, and RTW Management. Valley Metro in coordination with City of Phoenix developed Regional System-wide service Standards and Policies that would apply to all services that both entities provide, and also could be adopted by other cities. City of Scottsdale reviews different parameters such as route ridership; frequency of service; bus stop location; individual bus stop usage; ADA accessibility; and coordination with other city transportation project(s) etc. for determining placement of transit amenities.

The City of Scottsdale has adopted the City of Phoenix/Valley Metro system wide standards and policies. This document is provided as attachment C for reference.

City Council (Board) Approval for the Title VI Program

ATTACH A COPY OF THE COUNCIL MEETING MINUTES HERE



Title VI Program

August 2018



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ATTACHMENTS

- Attachment A – Language Assistance Plan
- Attachment B – 2015 On-Board Transit Survey Report
- Attachment C – Public Involvement Activities
- Attachment D – Evaluation of Valley Metro Fare and Service Changes 2015 - 2018
- Attachment E – Transit Service Monitoring Report
- Attachment F – Board of Director's Meeting Minutes for 2015 Title VI Update

SECTION 1 INTRODUCTION

Title VI Program Overview

The Federal Transit Administration (FTA) is responsible for ensuring that its funding recipients fully comply with Title VI of the Civil Rights Act of 1964 and with Executive Order 12898 on Environmental Justice in their planning and implementation processes. Subsequent to issuing the Executive Order, the U.S. Department of Transportation (DOT) issued Order 5610.2(a) for implementing the Executive Order on Environmental Justice. The DOT Order on Environmental Justice establishes compliance procedures for Executive Order 12898 that further directs that federal programs, policies and activities not have a disproportionately high and adverse human health and environmental effect on minority and low-income populations. In addition, the DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087) establishes guidance for the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects (denial of meaningful access to services) limited English proficient persons.

Pursuant to Title 49 U.S.C. Chapter 53, as amended, the City of Phoenix Public Transit Department is the designated recipient of funds under FTA Sections 5307 and 5309. As the designated recipient for federal funding, the City of Phoenix Public Transit Department is responsible for providing the FTA with a Title VI Update every three years in accordance with FTA Circular 4702.1B, dated October 1, 2012 and with reporting requirements detailed in 49 CFR Section 21.9(b).

As a subrecipient to the City of Phoenix Public Transit Department, Valley Metro must provide the City of Phoenix with a Title VI Program and a Title VI Update every three years at a time designated by the City of Phoenix in accordance with FTA Circular 4702.1B, dated October 1, 2012. The purpose of this report is to assess the compliance of Valley Metro with the Civil Rights Act of 1964, DOT Order 5610.2, Executive Order 12898 and 70 FR 74087.

Title VI of the Civil Rights Act of 1964, Section 601 states:

"No persons in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Executive Order 12898 states:

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."



Valley Metro Background

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 73 million riders annually. Valley Metro provides fixed route bus service, light rail service and complementary paratransit service across the region. Valley Metro 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 utilize service providers for operations 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. There are a total of 880 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, 15 key local bus routes, 1 limited stop peak, 20 Express/RAPID routes, 18 community circulator routes, one rural connector route and one light rail system. Valley Metro customers made over 65,000,000 boardings during Fiscal Year 2017.

Seven regional entities 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 1,142,308.

In 2002, Valley Metro Rail, Inc., a non-profit agency, was created and charged with design, construction and operation of the region's 57-mile high-capacity transit system. Valley Metro Rail Board member cities include Phoenix, Tempe, Mesa, Glendale 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 the half-cent sales tax to 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 two light rail extensions has increased the length of the light rail system to 26-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 opened to add 3.2-miles to the system. Valley Metro and the city of Mesa are currently wrapping up construction on a 1.9-mile extension that will take light



rail from Mesa Drive on Main Street to Gilbert Road. In addition, Valley Metro and the city of Tempe are constructing a 3-mile streetcar project that would run through Downtown Tempe.

Valley Metro RPTA and Valley Metro Rail Boards of Directors and their respective management committees help guide the agency by providing transportation leadership to best serve the region and their communities. Members are represented by an elected official who is appointed by their Mayor, Councilmembers or Board of Supervisors. Table 1 below shows the current members of both Boards and Table 2 shows both Management Committees. Note that members on both Management Committees are agency staff and are appointed by their respective agency.

Table 1 – BOARDS OF DIRECTORS

Valley Metro RPTA Board of Directors	
Scottsdale	Councilmember Suzanne Klapp, <i>Chair</i>
Glendale	Vice Mayor Lauren Tolmachoff, <i>Vice Chair</i>
Chandler	Councilmember Kevin Hartke, <i>Treasurer</i>
Avondale	Councilmember Pat Dennis
Buckeye	Councilmember Eric Orsborn
El Mirage	Vice Mayor Robert "Bob" Jones
Fountain Hills	Councilmember Cecil Yates
Gilbert	Vice Mayor Brigette Peterson
Goodyear	Councilmember Bill Stipp
Maricopa County	Supervisor Steve Gallardo
Mesa	Councilmember Chris Glover
Peoria	Councilmember Jon Edwards
Phoenix	Mayor Pro Tempore Thelda Williams
Surprise	Councilmember Skip Hall
Tempe	Vice Mayor Robin Arredondo-Savage
Tolleson	Councilmember Linda Laborin
Wickenburg	Mayor Everett Sickles
Youngtown	Mayor Michael LeVault



Valley Metro Rail Board of Directors	
Mesa	Councilmember Chris Glover, <i>Chair</i>
Phoenix	Mayor Pro Tempore Thelda Williams, <i>Vice Chair</i>
Chandler	Councilmember Kevin Hartke
Glendale	Mayor Jerry Weiers
Tempe	Vice Mayor Robin Arredondo-Savage

Table 2 –MANAGEMENT COMMITTEE MEMBERSHIPS

Valley Metro RPTA Transit Management Committee	
Avondale	Gina Montes
Glendale	Kevin Link
Phoenix	Ed Zuercher
Buckeye	Roger Klingler
Chandler	Marsha Reed
El Mirage	James Shano
Fountain Hills	Grady Miller
Gilbert	Jacob Ellis
Goodyear	Rob Bohr
Maricopa County	Reed Kempton
Mesa	Chris Brady
Peoria	Erik Strunk
Scottsdale	Paul Basha
Surprise	Nicole Lance
Tempe	Steven Methvin
Tolleson	No representative
ADOT – non-voting member	Sara Allred



Valley Metro Rail Management Committee	
Mesa	City Manager Chris Brady, <i>Chair</i>
Phoenix	City Manager Ed Zuercher, <i>Vice Chair</i>
Chandler	City Manager Marsha Reed
Glendale	City Manager Kevin Phelps
Tempe	Deputy City Manager Steven Methvin

To ensure compliance with the requirements of Title VI, Valley Metro is required to develop a Title VI Program and submit updates to the city of Phoenix every three years as part of their Triennial Review. The contents of this document follow the requirements and guidelines of the FTA Circular 4702.1B, which is also meant to fulfill USDOT regulations. In October 2012, the FTA amended the previous Title VI Circular (FTA C 4702.1A) and added new requirements. The updated Valley Metro Title VI Program will be in compliance with these new regulations.

In compliance with Title VI of the Civil Rights Act of 1964, and pursuant to FTA regulations from the Title VI Circular, Valley Metro has adopted this Title VI Program and policies to ensure that Valley Metro operates in a nondiscriminatory manner and that any potential adverse impacts to minority and low-income populations, resulting from a fare or major service change, are properly identified and analyzed to ensure that such changes are implemented without discriminate intentions. The Valley Metro Rail and Valley Metro RPTA Board of Director's meeting minutes approving the Title VI Program is in Attachment F.

SECTION 2 TITLE VI COMPLAINT POLICY AND PROCEDURES



Title VI Complaint Policy and Notice to the Public

Valley Metro posts the following Title VI Complaint Policy on the agency's website, printed in the Transit Book and posted at other key locations.

Civil Rights and Title VI Protection

At Valley Metro we do our very best to ensure that all passengers, regardless of race, color or national origin, obtain the same treatment and experience as everyone who comes aboard.

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes, Valley Metro must ensure 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 subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged non-compliance with Title VI and related statutes may be lodged with Valley Metro Customer Service. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

Filing Complaints

Valley Metro Customer Service is your point of contact should you need to file a complaint related to Title VI and related statutes. Any such complaint must be filed within 180 days of the alleged discriminatory act (or last occurrence).

How to File a Complaint

[Online complaint form](#)

Mail or In Person Fill out the printable complaint form and send to or drop off at: Valley Metro 4600 E. Washington St., Ste. 101 Phoenix, AZ 85034 Email: csr@valleymetro.org Phone: (602) 253-5000 TTY: (602) 251-2039

FTA Complaint

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

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

Customer Service

Customer Service will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for this region, is responsible for monitoring this process.



Requesting Information

To request information about Valley Metro's Title VI Policy or to request information in alternative formats, please contact Customer Service at csr@valleymetro.org or phone: (602) 253-5000, TTY: (602) 251-2039.

Contact Us

Customer Service

For more information on Civil Rights Protections

(602) 253-5000

csr@valleymetro.org

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by Valley Metro or our transit service provider may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form¹ or by calling Valley Metro's Customer Service. All complaints are logged into Valley Metro's Customer Assistance System (CAS) and will be investigated according to federal standards.

Valley Metro's Title VI Complaint Form (English and Spanish) is located on our website: (<https://www.valleymetro.org/civil-rights-and-title-vi-protection>). The form is available in both English and Spanish. Complaints can also be filed by contacting Valley Metro's Customer Service at:

Email: csr@valleymetro.org

Phone: (602) 253-5000

TTY: (602) 251-2039

Valley Metro has 30 days to investigate each complaint. If more information is needed to resolve the case, Valley Metro may contact the complainant. Following the investigation of the complaint, one of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to Valley Metro Customer Service.

¹ See page 13 for the complaint form in English and Spanish.

Procedures for Tracking and Investigating Title VI Complaints

TRACKING

- Complaint comes in and is logged into the CAS system.
- The Customer Service Administrator sends the complaint to the cities/transit provider for investigation and documentation within 24 hours.
- Complaint is returned to the Customer Service Administrator to ensure the information is complete and closes the complaint.
- Each cities administrator audits the complaints as well to ensure they meet the guidelines for Title VI.
- The administrator reviews a weekly report identifying outstanding complaints. During the review process the administrator will send out notifications to the agency and a copy to the relevant city to remind the entity that the complaint is not yet resolved or closed out. This process is reinitiated each week to ensure timely compliance.
- The administrator audits all completed Title VI complaints to check for accuracy and has complaints reopened by Customer Service administrator and sent back if not completed accurately.

INVESTIGATING

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

STEP ONE: Summary of the complaint

- Completed by the Regional Services Customer Relations staff

STEP TWO: Statement of issues

- List every issue derived from the complaint summary
- Include questions raised by each issue
 - Who?
 - What?
 - When?
 - Where?
 - How?
- Add new issues that surface during investigation
- Final list of issues becomes outline for investigation

STEP THREE: Respondent’s **reply** to each issue

- Obtain information from each respondent, listen to each tape, review each document
- All staff will document information collected in the customer contact (respondent area).
- After all respondent information is documented
 - Complete the documentation (remaining steps)
 - Determine the action taken

- Follow up with the customer.

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

- Operator (Interview/History)
- Radio/Dispatch/OCC reports
- GPS tracking software and programs
- Maintenance (Staff/Records)
- City Transit staff
- Witnesses
- Complainant (Interview / History)
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other transit employees
- Route history

STEP FOUR: Findings of fact

- Investigate every “issue” (stated in the “statement of issues noted in step two)
- Separate facts from opinions

STEP FIVE: Citations of pertinent regulations and rules

- Develop list of all regulations, rules, policies and procedures that apply to the investigation
 - Title VI requirements
 - Company rules and procedures
 - Valley Metro policies and service standards

STEP SIX: Conclusions of law

- Compare each fact from “findings of fact” to the list of regulations, rules, etc.
- Make decision on whether violation(s) occurred
- List of violations becomes “conclusions of law”

STEP SEVEN: Description of remedy for each violation

- Specific corrective actions for each violation found
- Include plans for follow-up checks
- Do not conclude report with “no action taken”
- If no violations found, conclude the report in a positive manner
 - Review policies and procedures
 - Review Title VI provisions

Response to Customer

- Detailed summary of conversation with customer
- Copy of letter to customer

Action Taken

- Must include specific corrective action for each violation found
- Include a follow-up action plan
- If no violations found, note policies, procedures, etc. reviewed with operator
- Never state “no action taken”
- Documented information should always include initials and dates



TITLE VI COMPLAINT FORM

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

Please provide the following information to process your complaint. Alternative formats and languages are available upon request. You can reach Customer Service at (602) 253-5000/TTY: (602) 251-2039, or email at csr@valleymetro.org.

Section I: Customer Information					
Name:					
Address:					
City:	State:	Zip:			
Work Phone:	Home Phone:	Cell Phone:			
Email Address:					
Section II: Incident Information					
Date of Incident:	Time of Incident:	AM/PM	City:		
Incident Location:		Direction of Travel:			
Route #:	Bus/Light Rail #:				
Service Type:	<input type="checkbox"/> Local	<input type="checkbox"/> Express/RAPID	<input type="checkbox"/> Light Rail	<input type="checkbox"/> Circulator/Connector	<input type="checkbox"/> Dial-a-Ride
Operator Name:					
Operator Description:					
What was the discrimination based on? (Check all that apply)					
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other:					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Have you filed this complaint with the Federal Transit Administration? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide information about a contact person at the Federal Transit Administration where the complaint was filed.	
Name:	Title:
Address:	Telephone:
Have you previously filed a Title VI complaint with this agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	
You may attach any written materials or other information that you think is relevant to your complaint.	
Signature and date required below:	

Signature _____ Date _____

602.253.5000
TTY: 602.251.2039
valleymetro.org



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FORMA DE QUEJAS DEL TITULO VI

Cualquier persona que crea que ha sido discriminada basándose en su raza, color u origen nacional por Valley Metro o sus proveedores de servicio puede registrar una queja del Título VI con el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información necesaria para que se procese su queja. Hay formatos e idiomas alternos disponibles si se solicitan. Llene esta forma y envíela por correo postal a o entréguela en: Regional Public Transportation Authority, 4600 E. Washington St., Suite 101, Phoenix, Arizona 85034. Usted puede comunicarse con el Servicio al Cliente llamando al (602) 253-5000/TTY: (602) 251-2039, ó por correo electrónico en csr@valleymetro.org.

Sección I: Información del Cliente			
Nombre:			
Domicilio:			
Ciudad:	Estado:	Código Postal:	
Teléfono del Trabajo:	Teléfono del Hogar:	Teléfono Celular:	
Domicilio Electrónico:			
Sección II: Información del Incidente			
Fecha del Incidente:	Hora del Incidente:	AM/PM	Ciudad:
Ubicación del Incidente:		Dirección de Viaje:	
# de Ruta:	# de Autobús/Tren Ligero:		
Tipo de Servicio:	<input type="checkbox"/> Local <input type="checkbox"/> LINK <input type="checkbox"/> Express/RAPID <input type="checkbox"/> Tren Ligero <input type="checkbox"/> Circulador/Connector <input type="checkbox"/> Dial-a-Ride		
Nombre del/la Conductor/a:			
Descripción del/la Conductor/a:			
¿En qué se basó la discriminación? (Marque todo lo que sea aplicable)			
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional <input type="checkbox"/> Dominio Limitado del Inglés <input type="checkbox"/> Otro:			
Explique tan claramente como sea posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron a usted (si los sabe), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use el reverso de esta forma.			

¿Ha usted registrado esta queja con la Administración Federal de Tránsito? <input type="checkbox"/> Sí <input type="checkbox"/> No	
Si contestó sí, por favor provea información sobre la persona de contacto en la Administración Federal de Tránsito donde se registró la queja:	
Nombre:	Título:
Domicilio:	Teléfono:
¿Ha usted registrado previamente una queja del Título VI con esta agencia?: <input type="checkbox"/> Sí <input type="checkbox"/> No	

Usted puede adjuntar cualquier material por escrito o cualquier otra información que crea que sea relevante a su queja.

Se requieren la firma y la fecha abajo:

Firma _____ Fecha _____

valleymetro.org
602.253.5000
TTY: 602.251.2039



RPT2143

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SECTION 3 TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS



List of Title VI Investigations, Complaints and Lawsuits

There were no Title VI lawsuits filed with Valley Metro or the FTA for transit services that Valley Metro provides. However, Valley Metro-operated services and uncategorized operators received 48 complaints related to Title VI.

Table 2 – Valley Metro Bus Title VI Complaints January 2015-December 2017

Complaint Number	Incident Date	Primary Category	Subcategory	Action Taken
253379	1/14/2015	Operator	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
253715	1/18/2015	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
257855	3/2/2015	Fares	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
260976	4/5/2015	Operator	Pass Up	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
261327	4/9/2015	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
262186	4/20/2015	Operator	Pass Up	No conclusive evidence found to indicate a policy violation had occurred. The investigation is unsubstantiated due to the insufficient information.
264095	5/9/2015	Operator	Pass Up	No conclusive evidence found to indicate a policy violation had occurred. The investigation is unsubstantiated due to the insufficient information.
264115	5/10/2015	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
265214	5/22/2015	Operator	Discrimination	Video was reviewed and no evidence of discrimination could be found. Issue addressed with operator per company policy.



Complaint Number	Incident Date	Primary Category	Subcategory	Action Taken
265349	5/26/2015	Operator	Pass Up	This report could not be validated because the description given by the contact does not match the description provided by the caller.
266523	6/8/2015	Operator	Attitude (operator)	Issue addressed with operator per company policy.
271172	8/3/2015	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
271173	8/3/2015	Operator	Discrimination	Video was reviewed and no evidence of discrimination could be found. Issue addressed with operator per company policy.
272558	8/17/2015	Operator	Discrimination	Video was reviewed and customer's allegations were confirmed. Issue addressed with operator per company policy.
275130	9/14/2015	Operator	Pass Up	No further action can be taken due to conflicting information provided by caller.
276981	10/1/2015	Operator	Discrimination	No further action can be taken due to conflicting information provided by caller.
280372	11/6/2015	Operator	Pass Up	Video was reviewed but there were no external cameras on the coach to confirm the event. Issue addressed with operator per company policy.
281139	11/16/2015	Operator	Pass Up	Video was reviewed but no data was available for the reported incident time. No evidence of discrimination could be found. Issue addressed with operator per company policy.
283496	12/13/2015	Operator	Policy (operator)	Video was reviewed for possible violations with inconclusive results. Issue addressed with operator per company policy.
283505	12/13/2015	Operator	Pass Up	Reviewed policies on customer service and bus stop procedure with operator.
287505	2/8/2016	Operator	Pass Up	Video was reviewed and a pass up was confirmed, however, no evidence of discrimination could be found. Issue addressed with operator per company policy.



Complaint Number	Incident Date	Primary Category	Subcategory	Action Taken
287567	2/8/2016	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
289411	2/28/2016	Operator	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
291697	3/24/2016	Operator	Discrimination	Video was reviewed and no evidence of discrimination could be found. Issue addressed with operator per company policy.
296333	5/11/2016	Operator	Attitude (operator)	Video was reviewed but there were no external cameras on the coach to confirm the event. No other evidence of discrimination could be found. Issue addressed with operator per company policy.
297004	5/19/2016	Operator	Discrimination	Video was reviewed and no evidence of discrimination could be found. Issue addressed with operator per company policy.
297490	5/25/2016	Fares	Fare Policy	No further action can be taken due to conflicting information provided by caller.
300203	6/28/2016	Operator	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
300879	7/5/2016	Operator	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. Issue addressed with operator per company policy.
301959	7/19/2016	Operator	Policy (operator)	Operator coached to treat all customers with courtesy and respect.
303423	8/4/2016	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
305883	8/30/2016	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.



Complaint Number	Incident Date	Primary Category	Subcategory	Action Taken
306199	9/1/2016	Operator	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
307900	9/20/2016	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
310633	10/22/2016	Operator	Pass Up	Operations manager concluded there was no evidence to support this as a Title VI incident.
320650	2/10/2017	Operator	Discrimination	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
321674	2/22/2017	Operator	Pass Up	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
326208	4/11/2017	Operator	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Operator instructed to treat all customers with courtesy and respect and to remain professional at all times.
331269	6/7/2017	Operator	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
331785	6/13/2017	Fares	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
332286	6/19/2017	Operator	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.



Table 3 – Valley Metro Light Rail Title VI Complaints January 2015-December 2017

Complaint Number	Incident Date	Primary Category	Subcategory	Action Taken
290199	3/8/2016	Security	Police	Called and left a message.
296208	5/11/2016	Security	Security Policy	N/A
300377	6/29/2016	Operator	Discrimination	Customer complained of being touched by security officers. Management confirmed event did not occur.
303715	8/8/2016	Security	Police	A citation was written and customer provided a copy with the court date. The customer failed to show for his court date.
308767	10/1/2016	Operator	Hazardous Operation	This complaint was investigated. The inference of a Title VI claim could not be confirmed by the alleged actions of the Operator as there was also no verbal comment or discriminatory language.
323866	3/16/2017	Security	Security Policy	Complaint investigated
324378	3/22/2017	Fares	Fare Policy	Spoke with officer about the incident according to company policy.

SECTION 4 INCLUSIVE PUBLIC PARTICIPATION PLAN



Valley Metro Public Participation Plan

Introduction

The regional transit public input/outreach process is conducted by Valley Metro for various transit-related activities and actions. Throughout the year, Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes and other transit-related events. This Title VI Public Participation Plan (Plan) was established to ensure adequate inclusion of the public throughout the Phoenix metropolitan community in accord with the content and considerations of Title VI of the Civil Rights Act of 1964. Federal regulations state that recipients of federal funding must “promote full and fair participation in public transportation decision-making without regard to race, color or national origin.” Valley Metro uses this Plan to ensure adequate involvement of low-income, minority and LEP populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular² (Circular).

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

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

² United States Department of Transportation, Federal Transit Administration, Circular 4702.1B.



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

Typical Public Participation Opportunities

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

For planning efforts, including fare and service changes, public meeting locations are held at a centralized area or near affected route areas and bilingual staff is available. Public notices and announcements are published in minority-focused publications; some examples include: the *Arizona Informant* (African American community), *Asian American Times* (Asian American community), *La Voz* and *Prensa Hispana* (Hispanic community). Press releases are also sent to these media sources regarding fare changes, service changes and other programs. Additionally, printed materials, including comment cards or surveys, are available in Spanish.

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

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

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

Public Participation Methods

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



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- Public meetings, hearings and open houses are held regularly at community-familiar locations with public transportation access and at convenient times, in collaboration with our city partners. These meetings provide an opportunity to meet with citizens and receive their comments and questions on proposed service changes and other programs. For each program, Valley Metro varies its meeting format in order to best engage the targeted population.
 - Valley Metro has staff available at public meetings, hearings, events and open houses to answer questions and receive comments in both English and Spanish. Valley Metro also uses court reporters to record verbal comments at public hearings.
 - Outreach for biannual service changes and other programs are conducted at or near the affected area (for example, along an affected bus route or at an affected transfer location) thus targeting the population that may be most impacted by proposed service or route changes. These efforts are also executed at transit stations, community centers, civic centers or major transfer locations.
 - Coordination with community- and faith-based organizations, educational institutions and other similar organizations occurs regularly. These coordination efforts assist Valley Metro in executing public engagement strategies that reach out to members of the population that may be impacted.
 - Valley Metro conducts specially-tailored transit presentations to community groups. This includes mobility training for senior citizens and people with disabilities and information on how to use the transit system for new residents and refugees. More comprehensive travel training is conducted monthly at a regional center for customers with disabilities.
 - All public meeting notices for biannual service changes and other programs are translated to Spanish. Notices regarding Valley Metro projects and programs are widely distributed to the public through multiple methods, including through community- and faith-based organizations, via door hangers, direct mail, newspaper advertisement, electronic messaging (email through existing database), social media, door-to-door canvassing and on-board announcements on the transit system.
 - Valley Metro publishes advertisements of any proposed service or fare change in minority publications in an effort to make this information more easily available to minority populations. Additionally, Valley Metro sends press releases regarding service changes and other programs to Spanish-language media.
 - Valley Metro offers online participation via social media, webinar and email input as an alternative opportunity for comment.



-
- Major surveying efforts are conducted in both English and Spanish to ensure that the data collected is representative of the general public.
 - Valley Metro Customer Service staff is multilingual.
 - All comments are documented in a centralized database. For biannual service changes, comments are categorized as “in favor,” “not in favor” or “indifferent.” Comment summary information is provided to Valley Metro’s city partners for review and is also presented to the Valley Metro Board of Directors for consideration when taking action on proposed service changes.

Depending upon the type of project, program or announcement, public participation methods may be customized to ensure that the general public is adequately involved in the decision-making process.

Conclusion

Valley Metro conducts public outreach throughout the year to involve the general public with agency activities and transit planning processes. Using a variety of communication techniques such as facilitating meetings at varied times and locations using multiple formats, placing printed materials at multiple outlets and providing opportunities via phone and web to share or collect information, Valley Metro ensures that outreach efforts include opportunities for minority, low-income and LEP populations that may be impacted by the activity or transit planning process under consideration to comment. Valley Metro will continue to involve all communities in an effort to be inclusive of all metropolitan Phoenix area populations and to also comply with Federal regulations. Valley Metro will continue to monitor and update this Inclusive Public Participation Plan as part of the Title VI Program which is updated triennially.

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SECTION 5 LANGUAGE ASSISTANCE PLAN



Language Assistance Plan

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The explanation of the required Language Assistance Plan (LAP) outlined below is based on federal guidance provided in FTA Circular 4702.1B.

Language Assistance Needs Assessment – Four Factor Analysis

The following outlines how to identify a person who may require language assistance, the ways in which Valley Metro and the City of Phoenix Public Transit Department provide such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service. In order to prepare the LAP, a needs assessment is conducted using the four factor analysis. The four factors are:

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Valley Metro and City of Phoenix Public Transit Department services and programs.

Factor 2: The frequency with which LEP persons come into contact with Valley Metro and City of Phoenix Public Transit Department services and programs.

Factor 3: The nature and importance of the Valley Metro and City of Phoenix Public Transit Department services and programs in people's lives.

Factor 4: The resources available to Valley Metro and the City of Phoenix Public Transit Department for LEP outreach, as well as, the costs associated with the outreach.

The following is an explanation of what is to be included in the four factor LEP population needs assessment. In addition to the following explanation, Valley Metro has conducted a thorough LEP four factor analysis and prepared an LAP to be used by all Valley Metro member agencies. Please refer to Attachment A for the LAP.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Valley Metro and City of Phoenix Public Transit Department services and programs.

An effective LAP is the preferred way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be addressed through the transit service planning and facilities project development process.

Demographic Profiles for Communities of Concern: Communities of concern describe populations that have been determined by the federal government as benefiting from



protections to ensure their meaningful involvement in planning and services. These vulnerable populations have been identified through the Civil Rights Act of 1964, Executive Order 12898 and Executive Order 13166 to end discrimination and ensure equal access to all federally funded services.

To assist with identifying Title VI neighborhoods, the presence of Title VI populations is compared against the Maricopa County average for each community of concern. Linguistic isolation follows federal guidance at five percent within a census block of 1,000 people or more within a neighborhood. Based on the 2016 American Community Survey (ACS) five-year estimates, the threshold for each mandated community of concern is as follows:

Communities of concern are identified as those census tracts where the identified group represents a percentage of the population equal to or greater than that of the Maricopa County average. Federal guidelines state that minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is measurably greater than the minority population percentage in the general population or other appropriate unit of geographic analysis—in this case, Maricopa County.

Limited English Proficient households: A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. An area is identified as LEP when five percent or more of the population, or 1,000 people within a neighborhood, fit this definition. The Census Bureau further defines households as linguistically isolated when there are no members aged 14 years and over who speak only English or who speak a non-English language and speak English “very well.” In other words, all members of the household ages 14 years and over have at least some difficulty with English.

Factor 2: The frequency with which LEP persons come into contact with Valley Metro and City of Phoenix Public Transit Department services and programs.

The Valley Metro Planning division has conducted an analysis of the frequency with which LEP persons come into contact with the Valley Metro system by combining demographic mapping of service crossing census tracts with greater than average concentrations of minority, low-income and LEP populations and requests made for assistance in a language other than English through the Customer Service Center. Please refer to the in-depth LEP analysis conducted by Valley Metro in *Attachment A: Valley Metro Limited English Proficiency Four Factor Analysis and Language Access Plan*.

Factor 3: The nature and importance of the Valley Metro and City of Phoenix Public Transit Department services and programs in people's lives.



An analysis of benefits and burdens is a critical component of the Valley Metro and City of Phoenix Public Transit Department's Title VI Program. The Valley Metro Community Relations department, in partnership with the City of Phoenix Public Transit Department, analyzes the feedback reported by communities of concern to determine the potential benefits and burdens of a transportation service or fare change on the population. In addition, proposed transportation improvements are analyzed and documented to determine if the improvements impose a disproportionate burden on the communities of concern. This analysis, as well as the input from communities of concern, is incorporated as proposed service and fare changes advance through the Valley Metro and City of Phoenix committee, board and council processes for approval. Feedback from Title VI populations is used to assess enhancements to the Title VI Plan on a biennial basis.

SECTION 6 COLLECTION OF DEMOGRAPHIC DATA

OVERVIEW

This section is a demographic analysis of the population within Maricopa County and Valley Metro’s Service Area, which is a 0.5-mile radial buffer around fixed route services. In order to be familiar with the low-income and minority demographics of the area, Valley Metro uses the most current and accurate data available from the US Census Bureau and the Valley Metro Origin and Destination Survey that is conducted every three years.

The following data for minority and low-income populations were gathered from the Census Bureau’s 2016 ACS 5-year estimates. Low income is defined as the population with incomes at or below 150 percent of the Department of Health and Human Services poverty level.

This section also provides a summary of the results from the 2015 On-Board Survey, which is currently the best available data to observe ridership characteristics and fare usage of minority and low-income populations on fixed routes within the Valley Metro network.

CENSUS DATA

Table 3 summarizes the minority and low-income populations of all the Census Tracts within Maricopa County and Valley Metro’s service area, the 0.5-mile radial buffer around fixed route transit services, based on data from the 2016 ACS 5-year estimate. Map 1 (page 36) shows the service area and Maricopa County.

Table 3 Minority and Low-Income Population Summary

	Total Population	Minority Population	Percent Minority (%)	Low-Income Population	Percent Low-Income (%)
Maricopa County	4,088,549	1,649,507	40.3	1,022,955	25.0
Service Area (1/2-mile buffer around fixed route service)	3,388,039	1,484,044	43.8	923,961	27.3

Table 4 summarizes the racial distribution among the population within Maricopa County and service area. The total minority population within the service area is 1,484,044, or 43.8 percent of the total population. The three largest racial groups, other than White, are Asian, Black/African American and American Indian/Alaskan Native. The category Two or More Races represents people who consider themselves to be any combination of races. The other categories represent people who consider themselves to be of one race. It should be noted that the category Hispanic/Latino is an ethnicity, not a race.



Table 4 Racial and Hispanic Distribution

Total Population	White	African American	American Indian	Asian	Other Races	Two or More Races	Hispanic/Latino (any Race)
Maricopa County							
4,088,549	3,214,001	216,064	77,142	157,074	281,320	134,523	1,142,981
100%	78.6%	5.3%	1.9%	3.8%	6.9%	3.3%	28.0%
Service Area							
3,388,039	2,599,852	193,429	71,197	132,523	267,105	116,406	1,043,557
100%	76.7%	5.7%	2.1%	3.9%	7.9%	3.4%	30.8%

PASSENGER SURVEY (ORIGIN AND DESTINATION SURVEY)

Valley Metro conducted a transit on-board survey during the spring of 2015. The purpose of the survey was to better understand the travel patterns of transit users in the metropolitan Phoenix area. The results of the survey will be used to update regional travel demand models and improve the overall quality of transit service in the region.

The goal was to obtain useable surveys from approximately 15,621 passengers. The actual number of usable surveys was 21,803. Of the useable surveys, 9,350 were completed with light rail passengers and 12,453 were completed with bus passengers. The magnitude of the survey will allow regional planners to better understand the needs and travel patterns of many specialized populations. For example, the final database contains responses from:

- Nearly 11,800 people who do not have cars
- More than 2,300 people under age 18
- More than 2,900 people age 55 or older
- More than 5,300 people with Hispanic or Latino ethnicity
- More than 5,500 students, including nearly than 3,600 college/ university students and more than 1,700 students in grades K-12
- Nearly 4,500 people living in households with incomes less than \$15,000 per year
- More than 15,200 people who were employed full or part time
- Nearly 2,400 people who were not employed but were seeking work

Major Findings

Some of the major findings from the survey include the following:

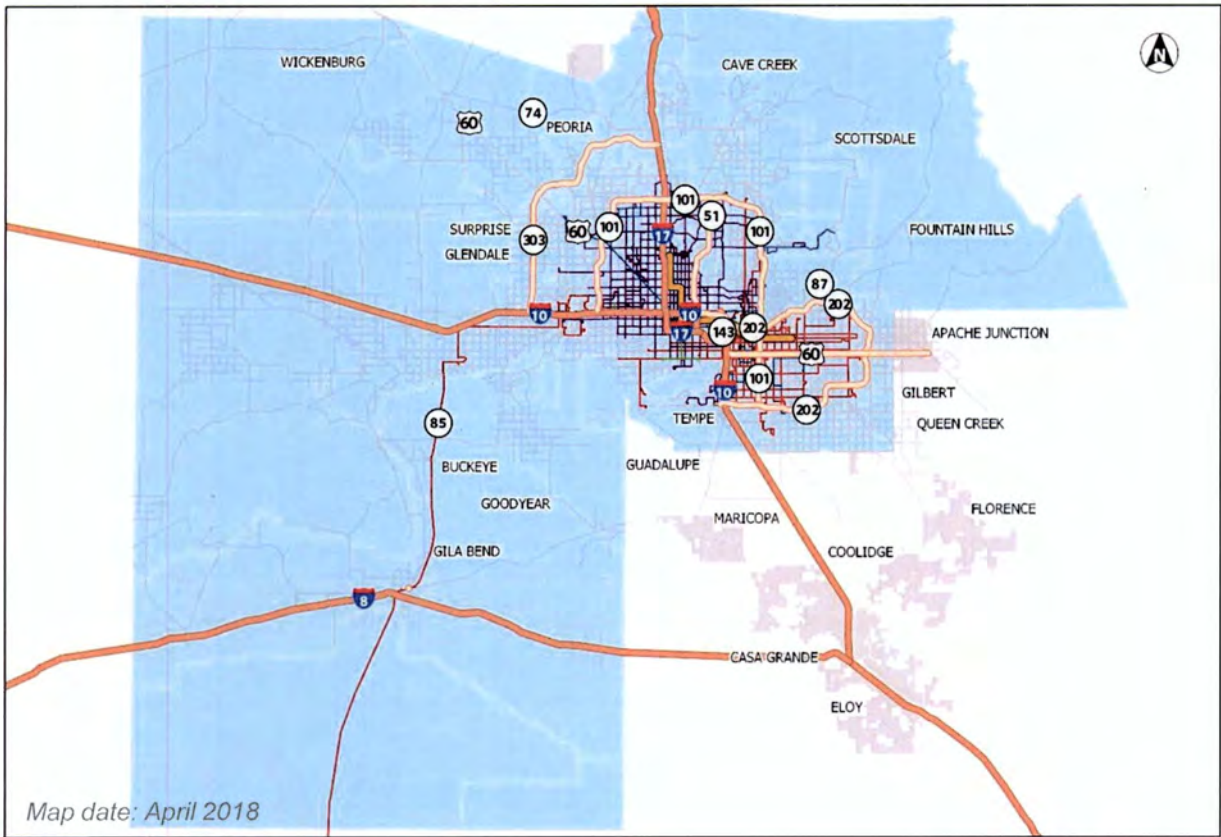
- Sixty percent of all transit riders (60.3 percent) are between the ages of 19 and 34
- Over half of all Valley Metro transit riders (53.8 percent) do not have a valid driver's license
- Walking is the dominant access and egress mode for all riders, on average 88.0 percent
- About two-thirds (65.9 percent) of Valley Metro transit riders use only one route to complete their one-way trip
- Almost one-fourth (23.7 percent) of all Valley Metro transit riders speak another language besides English at home

The full On-board Transit Survey Report is in Attachment B.

Demographic Maps

Map 1 displays all fixed bus routes and light rail transit service in the region.

Map 1: Maricopa County and Fixed Route Transit Service

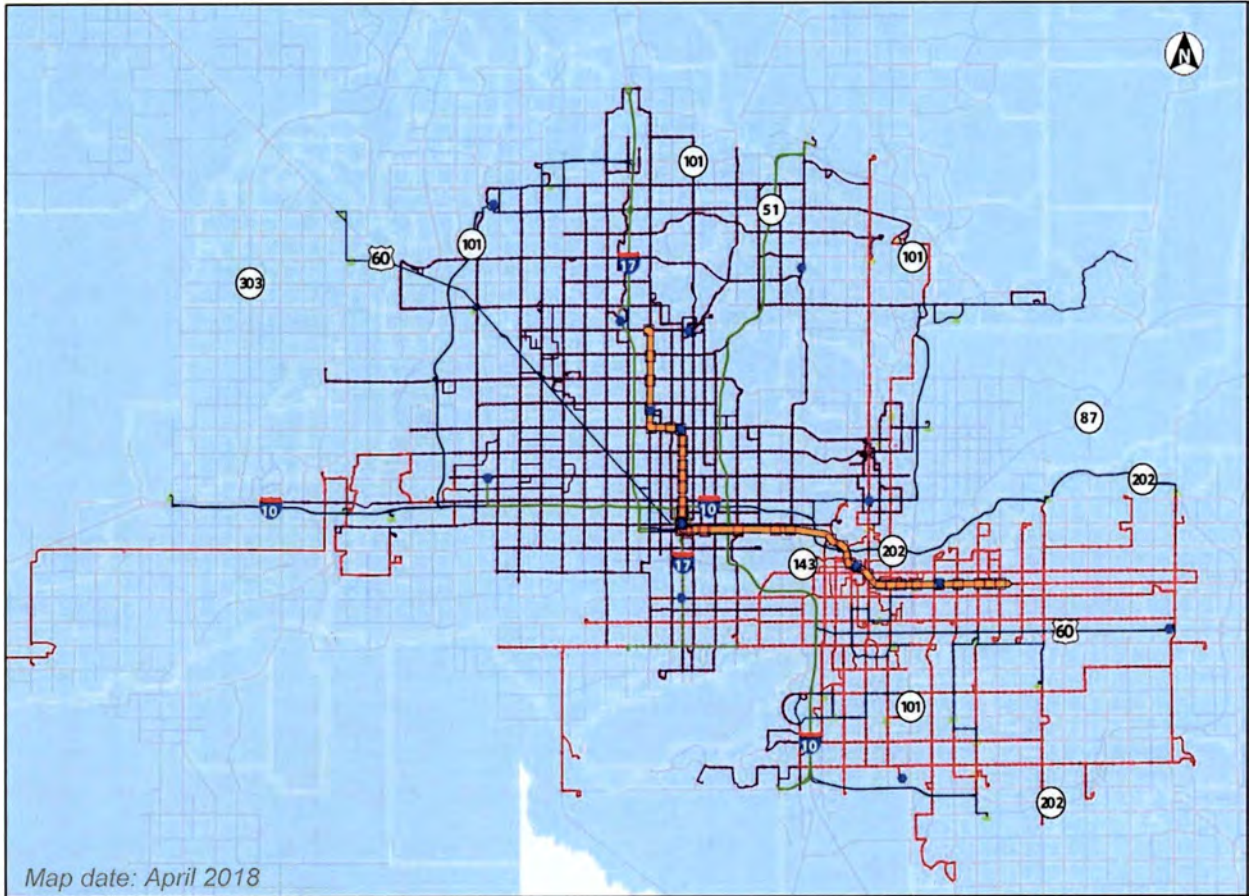


- LEGEND**
- Maricopa Service Area
 - Express
 - Light Rail
 - RAPID
 - Phoenix
 - Valley Metro













Map 2 displays a zoomed view of the fixed route transit service in the region. This map includes bus stops, light rail stations, park-and-ride facilities and transit centers.

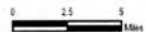
Map 2 Fixed Route Transit Service (Zoomed View)



Map date: April 2018

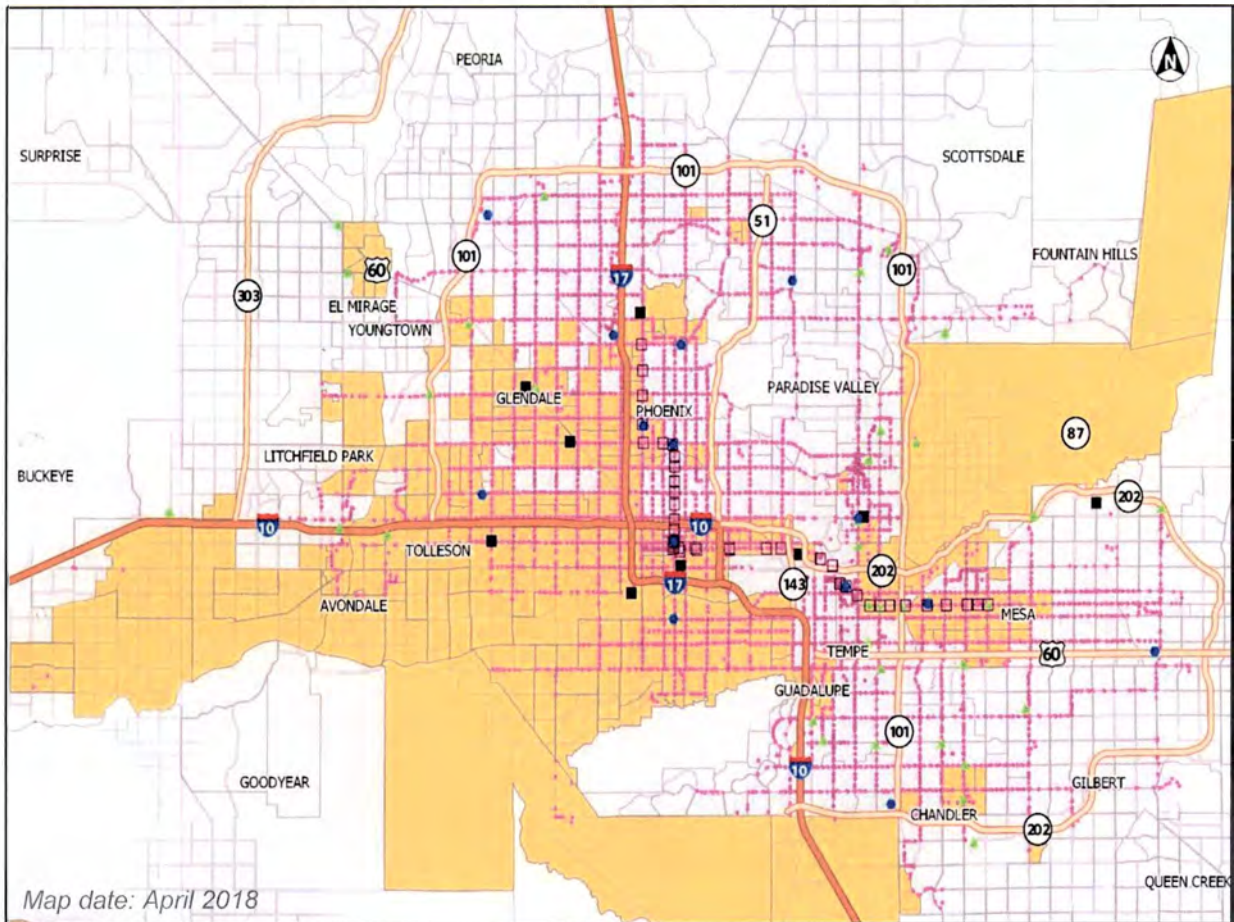
LEGEND

- | | | | |
|-----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
|  Maricopa Service Area |  Express |  Phoenix |  Transit Centers |
|  Light Rail Stations |  Light Rail |  Valley Metro |  Park and Rides |
| |  RAPID | |  Bus Stops |




Map 3 displays a closer view of the minority population and their relation to the regional transit system amenities. This includes bus stops, light rail stations, park-and-ride facilities, maintenance facilities and transit centers.

Map 3 Fixed Route Transit System Amenities and Minority Populations



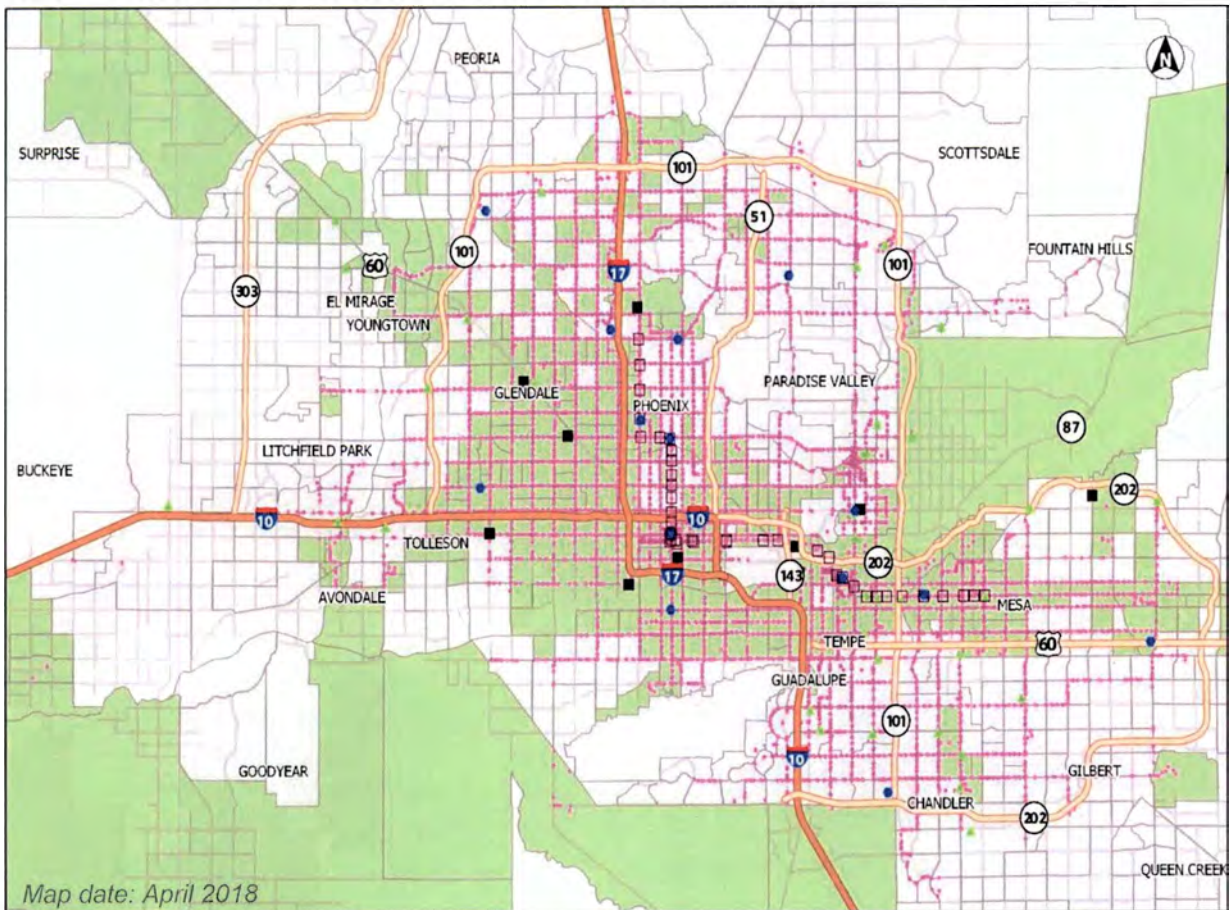
LEGEND

 Under 41.1%	 Light Rail Stations	 Transit Centers	 Bus Stops
 Above 41.1%	 Park and Rides	 Maintenance Facilities	

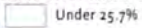



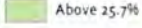




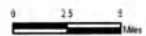
Map 4 displays a closer view of the low-income population and their relation to the regional transit system amenities. This includes bus stops, light rail stations, park-and-ride facilities, maintenance facilities and transit centers.

Map 4 Fixed Route Transit System Amenities and Low-Income Populations



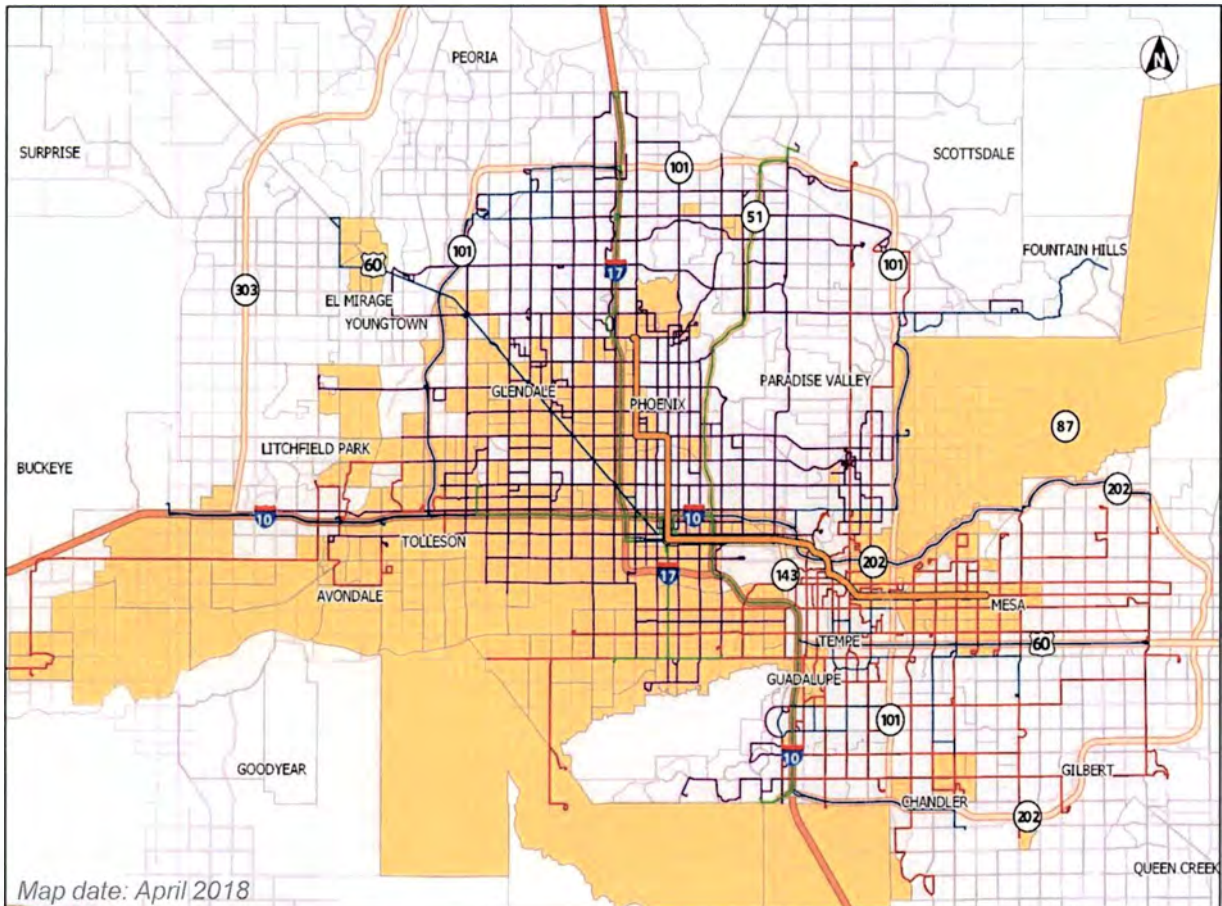
LEGEND

 Under 25.7%	 Light Rail Stations	 Transit Centers	 Bus Stops
 Above 25.7%	 Park and Rides	 Maintenance Facilities	



Map 5 displays the concentrations of minority populations within the fixed route transit service area by showing the census tracts that are below and above the route service area minority population average.

Map 5 Fixed Routes and Census Tracts by Minority Population



Map date: April 2018

LEGEND

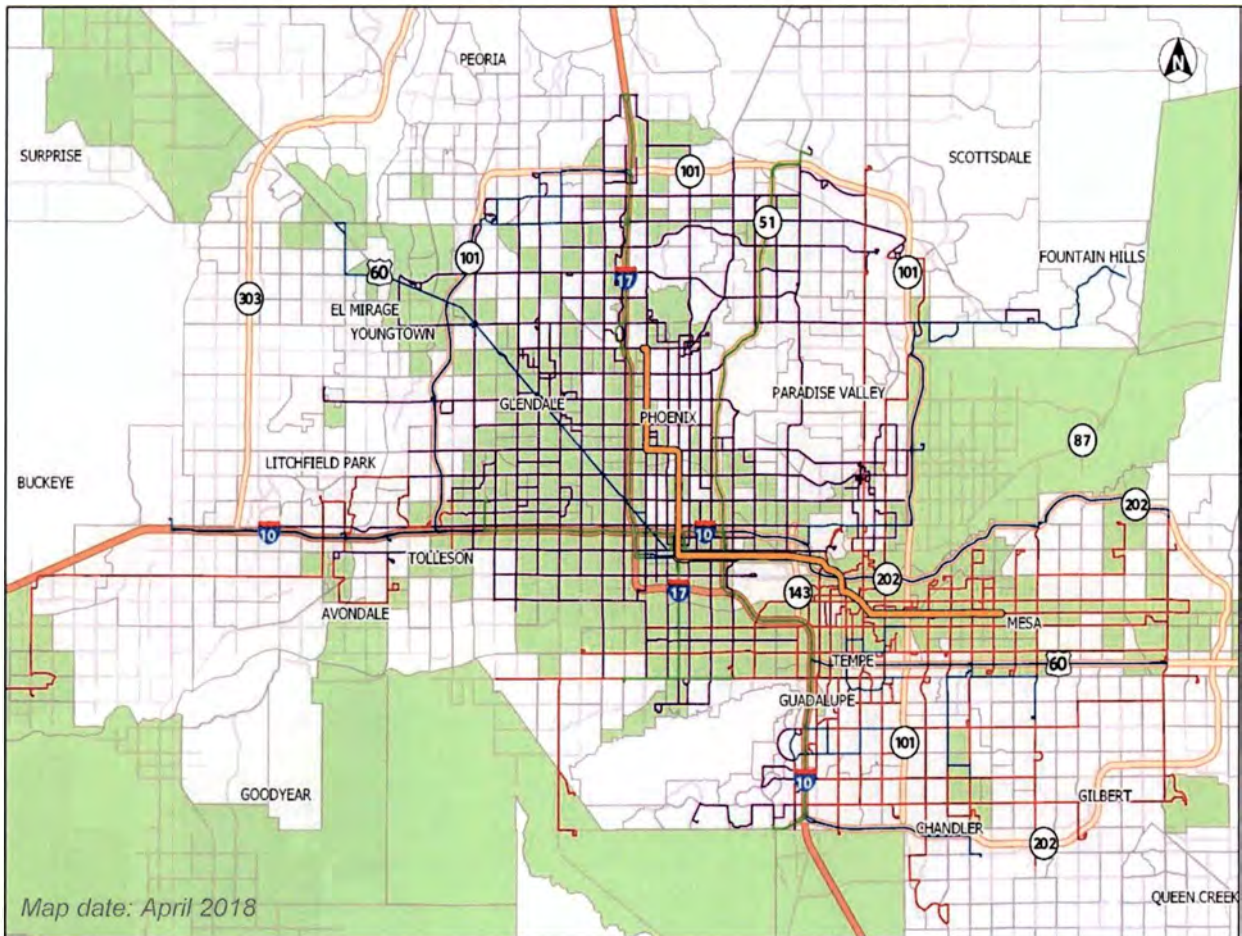
Minority Population Percentage

- Under 41.1% Express Phoenix
- Above 41.1% Light Rail Valley Metro
- RAPID



Map 6 shows the concentrations of low-income populations within the fixed route transit service area by showing the census tracts that are below and above the route service area low-income population average.

Map 6 Fixed Routes and Census Tracts by Low-Income Population

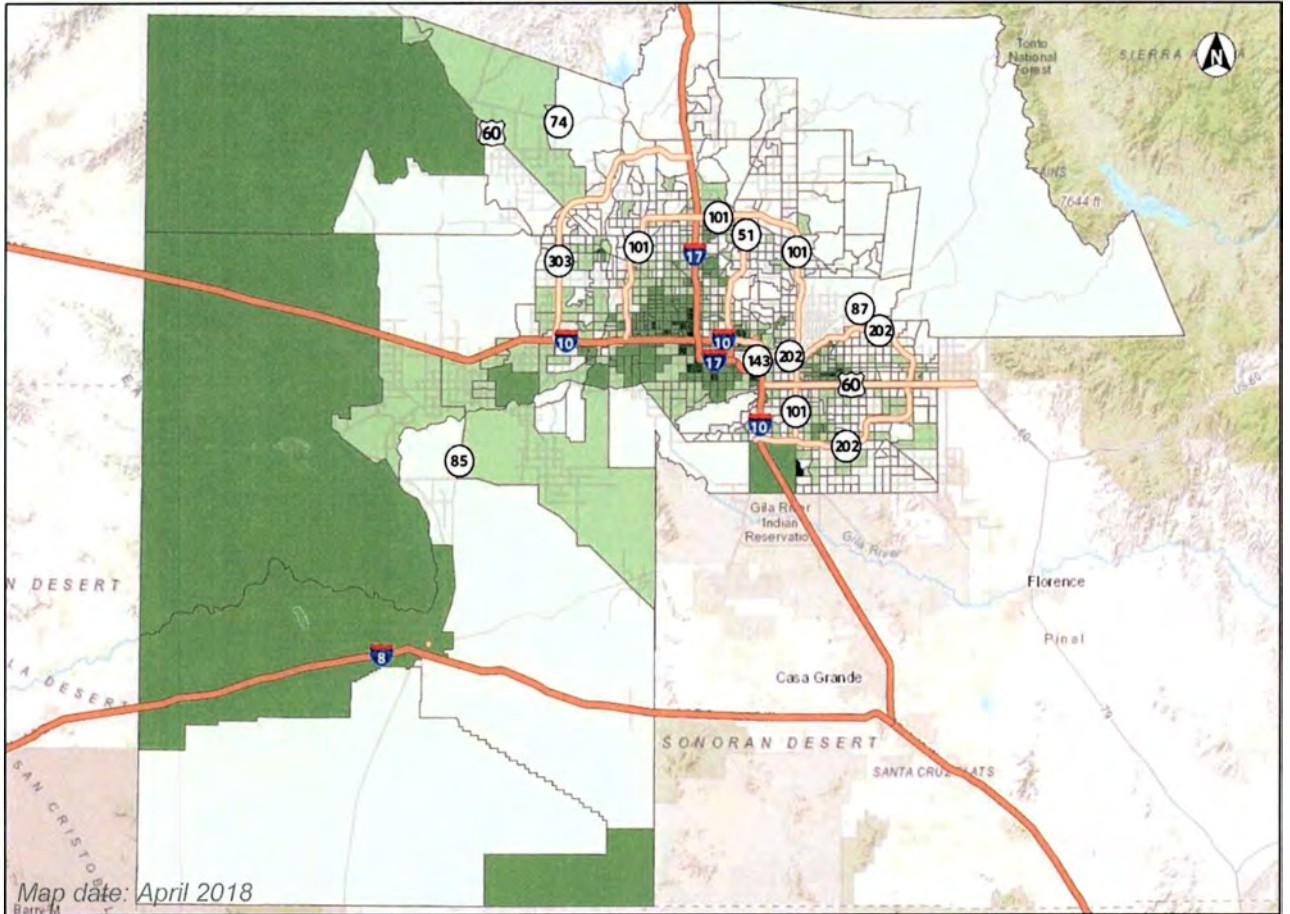


LEGEND
Low-Income Population Percentage
 Under 25.7% Express Phoenix
 Above 25.7% Light Rail Valley Metro
 RAPID



Map 7 displays the population within Maricopa County that speak English less than very well, per census tracts, and the fixed route transit service area.

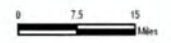
**Map 7 Limited English Proficiency Population –
Speak English Less Than Very Well**



Map date: April 2018

LEGEND
Speak English Less than Very Well

0% - 5%
6% - 15%
16% - 30%
31% - 45%
46% - 63%



SECTION 7 SYSTEM-WIDE SERVICE STANDARDS AND POLICIES



Overview

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

Regional Service Policies for Bus Service

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

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

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

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

1.2 Service Policy Elements

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

1.3 Level of Service Assessment

- Calculate the average age of the entire bus fleet.

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

2.0 DISTRIBUTION OF TRANSIT AMENITIES

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

Regional Service Standards for Bus Service

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

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

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

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

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

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

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

Commuter Express/RAPID Service/Limited Stop Peak⁴

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

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

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

Community Circulator Service

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

Rural Connector

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

1.2 Vehicle Load Data Collection

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

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

1.3 Vehicle Load Assessment

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

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

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

Commuter Express/RAPID Service/Limited Stop Peak³

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

Community Circulator Service

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

Rural Connector

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

2.0 VEHICLE HEADWAY

Vehicle headway standards are based on the TSPM⁴ for regionally funded routes. Transit service standards and performance measures represent rules and guidelines by which the performance of the region's transit system may be evaluated, and decisions regarding transit investments may be prioritized and measured.

2.1 Vehicle Headway Standard

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

³ Note that Commuter Express/RAPID Services minority and low-income routes are determined by stop location (rather than full route) since the majority of these routes travel from a park-and-ride location to a major employment center along a freeway or other corridor without making stops.

⁴ More information about this effort available here:

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

Table 6 – Vehicle Headway Standards

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

*60 min early morning and late night

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

2.2 Vehicle Headway Data Collection

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

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

Commuter Express/RAPID Service/Limited Stop Peak

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

Circulator Service

- Measure standard using published circulator route service schedules

Rural Connector

- Measure standard using published Rural Connector service schedules

2.3 Vehicle Headway Assessment

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

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

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

3.2 On Time Performance Data Collection

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

3.3 On Time Performance Assessment

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

4.0 SERVICE AVAILABILITY

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

4.1 Service Availability Standard

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

Local Bus and Key Local Bus

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

Limited Stop Peak and Limited Stop All-Day

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

Express/RAPID Service

- Express/RAPID stops are strategically placed and are generally located at park-and-ride facilities

- No more than four inbound Express bus stops
- Outbound Express/RAPID stops behave more like a local service and will pick up or drop off passengers more frequently

Community Circulator Service

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

4.2 Service Availability Data Collection

- Bus stop database

4.3 Service Availability Assessment

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

Regional Service Policies for Light Rail Service

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

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

1.2 Service Assessment

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

2.0 DISTRIBUTION OF TRANSIT AMENITIES

2.1 Service Standard

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

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

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

2.2 Service Assessment:

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

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

Regional Service Standards for Light Rail Service

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

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

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

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

1.2 Vehicle Load Data Collection

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

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

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

1.3 Vehicle Load Assessment

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

2.0 VEHICLE HEADWAY

2.1 Vehicle Headway Standard

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

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



Table 6 – Vehicle Headway Standards

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

2.2 Vehicle Headway Data Collection and Service Assessment

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

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

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

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

3.2 On Time Performance Data Collection and Assessment

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

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

4.0 SERVICE AVAILABILITY

4.1 Service Availability Standard

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

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

4.2 Service Availability Assessment

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

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

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SECTION 8 MONITORING TRANSIT SERVICE



Overview

Valley Metro frequently monitors its bus services and the siting of transit amenities in an objective manner to identify the potential for adverse, disproportionately high or disparate impacts to minority populations. Per FTA requirements, the monitoring report will be used to provide suggested corrective actions for consideration, awareness and approval by the Valley Metro Board.

Valley Metro's Title VI Monitoring Program is guided by the FTA Circular 4702.1B, Chapters 4-9, and Valley Metro's System-Wide Standards and Policies.

Valley Metro has completed an evaluation of transit services based on the system-wide standards and policies identified in Section 7 of the report. This report is intended to monitor compliance with the regional standards and policies for both bus and light rail services. The monitoring report did not identify disparities in the level and quality of Valley Metro operated transit services provided to different demographic groups. The full monitoring report is in Attachment E.

**SECTION 9 TITLE VI MAJOR SERVICE CHANGE, FARE
CHANGE AND IMPACT ANALYSIS POLICIES**

Overview

The following service and fare equity policies were developed according to new federal requirements of Title VI as outlined in FTA Circular 4702.1B. Both policies, including Disparate and Disproportionate Burden, were adopted by the Valley Metro RPTA Board and Valley Metro Rail Board on March 21, 2013. Valley Metro conducted a number of public meetings throughout the region and held a public hearing on the policies March 5, 2013. The Service Change Policy underwent a minor revision to be consistent with the FTA Circular 4702.1B with respect to the time frame in which temporary and new service would be required to undertake a Title VI analysis. The timeframe was extended to a full 365 days from the previous 180 days. In addition, the definition of low-income population and areas was changed from 80 percent or less of the national per capita income, and residential land use area was changed to 150 percent or less of the national per capita income. The Board approved this change as part of their approval of the 2015 Title VI Program Update on August 13, 2015. There are no changes to the Major Service Change and Service Equity Policy or the Fare Equity Policy for the 2018 Title VI Program Update.

Major Service Change and Service Equity Policy

Purpose of the Policy

The purpose of the Major Service Change and Service Equity Policy is to define thresholds for determining major service changes and whether potential changes to existing transit services will have a disparate impact based on race, color or national origin, or whether potential service changes will have a disproportionately high or adverse impact on minority and/or low-income populations.

Basis for Policy Standards

Federal law requires the City of Phoenix and Valley Metro to evaluate changes to transit services, as outlined in FTA Circular 4702.1B, effective October 1, 2012. In order to comply with 49 CFR Section 21.5(b)(a), 49 CFR Section 21.5 (b)(7) and Appendix C to 49 CFR part 21, recipients shall “evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to ‘major service changes’ only. The recipient should have established guidelines or threshold for what it considers a ‘major’ change to be.”

Major Service Change Policy

A. Major Service Change

The following are considered major service changes (unless otherwise noted under exemptions) and will be evaluated in accordance with the regulatory requirements set forth in FTA Circular 4702.1B:

1. Route-Level Service Reduction or Elimination

- Reducing an existing route by more than 25% of weekday route revenue miles⁵, or
- Reducing an existing route by more than 25% of Saturday route revenue miles⁵, or
- Reducing an existing route by more than 25% of Sunday route revenue miles⁵, or
- Reducing the number of route directional miles more than 25%⁵, or
- A change in a route alignment resulting in a 25% or greater variance from the existing route alignment⁵, or
- In situations where service would be reduced or eliminated in jurisdictions where minority and/or low-income populations exceed the transit system service area (Maricopa County) average.

2. Route-Level Expansion or Addition of a New Route

- Adding a new route, or
- Expansion of an existing route that increases weekday route revenue miles by more than 25%⁵, or
- Expansion of an existing route that increases Saturday route revenue miles by more than 25%⁵, or
- Expansion of an existing route that increases Sunday route revenue miles by more than 25%⁵, or
- Expanding the number of route directional miles more than 25%⁵, or
- A change in a route alignment resulting in a 25%⁵ or greater variance from the existing route alignment.

B. Minority Disparate Impact Policy (Service Equity Analysis)

When conducting a service change equity analysis, the following thresholds will be used to determine when a service change would have a disparate impact on minority populations:

1. Route-Level Service Reduction or Elimination

- Service Level and Service Area Reduction:
 - If the percentage of minority passengers⁶ on an affected route is greater than the transit system's minority ridership (within the appropriate dataset's

⁵ A change of 25% in weekly route revenue miles and/or route directional miles is the current City of Phoenix threshold for determining whether a potential transit service change qualifies as a major service change (or "substantial" service change) according to the City of Phoenix resolution (1990). This percentage is generally an industry-wide percentage threshold used by peer transit systems throughout the United States. The City of Phoenix resolution also specifies that a public comment period will be initiated when a change in transit service of 25% or more is determined.

⁶ The determination of the transit system and an affected route's minority and/or low-income population will be derived from the most recently completed, statistically valid regional on-board origin and destination survey.

margin of error) by transit classification (local, express, neighborhood circulators and rural bus).⁷

2. Route-Level Expansion or Addition of a New Route

- Route Level Expansion or Transit System Area Expansion (includes addition of new routes):
 - If a route level expansion or transit system area expansion is considered that coincides with a reduction in transit service on the same route or other routes, and the route(s) considered for service expansion predominantly serve non-minority and/or non-low-income geographic areas while the route(s) considered for reduction predominantly serve minority and/or low-income geographic areas, then a disproportionate burden may be determined. The determination of a disproportionate burden will be based on meeting both of the following criteria:
 - If the percentage of minority passengers⁶ on an affected route considered for service expansion is less than the transit system's minority ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators and rural bus),⁷ **AND**
 - If the percentage of minority passengers⁶ on an affected route considered for service reduction is greater than the transit system's minority ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators and rural bus).⁷

C. Low-Income Disproportionate Burden Policy (Service Equity Analysis)

When conducting a service change equity analysis, the following thresholds will be used to determine when a service change would have a disproportionate burden on low-income populations:

1. Route-Level Service Reduction or Elimination

- If the percentage of low-income passengers⁶ on an affected route is greater than the transit system's low-income ridership (within the appropriate dataset's

⁷ Local routes include local fixed-route bus, light rail, LINK bus, local limited stop bus. Express routes include express bus and RAPID bus. Circulator routes will be evaluated similarly to local routes for fare changes and major services changes, but will be considered separately from local and express services when considered in the context of a region- or system-wide Title VI analysis. Circulator bus services are provided by the municipalities they serve and not the regional transit agency.

margin of error) by transit classification (local, express, neighborhood circulators and rural bus).⁷

2. Route-Level Expansion or Addition of a New Route

- Route Level Expansion or Transit System Area Expansion (includes addition of new routes):
 - If a route level expansion or transit system area expansion is considered that coincides with a reduction in transit service on the same route or other routes, and the route(s) considered for service expansion predominantly serve non-minority and/or non-low-income geographic areas while the route(s) considered for reduction predominantly serve minority and/or low-income geographic areas, then a disproportionate burden may be determined. The determination of a disproportionate burden will be based on meeting both of the following criteria:
 - If the percentage of low-income passengers⁶ on an affected route considered for service expansion is less than the transit system's low-income ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators and rural bus),⁷ **AND**
 - If the percentage of low-income passengers⁶ on an affected route considered for service reduction is greater than the transit system's low-income ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators and rural bus).⁷

Table 7 – Equity Analysis Data Sources

Category	Action	Sub Action	Evaluation Method
Fare	Adjustment	N/A	O/D ^a profile data of affected fare category and/or Census Data
Service Span	Reduction	N/A	O/D ^a profile data of affected route
	Expansion	N/A	
Service Headway	Reduction	N/A	O/D ^a profile data of affected route
	Expansion	N/A	
Route Length	Reduction	N/A	O/D ^a Data
	Expansion	N/A	Census Data
Route Alignment	Reduced Alignment	N/A	O/D ^a Data
	Expanded Alignment	N/A	Census Data
	Modified Alignment	Eliminated Segment(s)	
Segment(s) to New Areas			Census Data
New Route	New Route	N/A	Census Data

^a Origin/Destination Survey Data

Exemptions

The major service change thresholds exclude any changes to service that are caused by the following:

- Discontinuance of Temporary or Demonstration Services – The discontinuance of a temporary transit service or demonstration service that has been in effect for less than 365 days.
- Headway Adjustments – Headways for transit routes may be adjusted up to 5 minutes during the peak hour periods and 15 minutes during non-peak hour periods.
- New Transit Service “Break-In” Period – An adjustment to service frequencies and/or span of service for new transit routes that have been in revenue service for less than 365 days.

-
- Other Service Providers or Agencies – Actions of other service providers or public agencies providing/administering transit services that are not the responsibility of Valley Metro.
 - Natural or Catastrophic Disasters – Forces of nature such as earthquakes, wildfires or other natural disasters, or human-caused catastrophic disasters that may force the suspension of scheduled transit service for public safety or technical reasons.
 - Auxiliary Transportation Infrastructure Failures – Failures of auxiliary transportation infrastructure such as vehicular bridges, highway bridge overpasses, tunnels or elevated highways that force the suspension transit service.
 - Overlapping Services – A reduction in revenue miles on one line that is offset by an increase in revenue miles on the overlapping section of an alternative transit route (an overlapping section is where two or more bus routes or rail lines share the same alignment, stops or stations for a short distance).
 - Seasonal Service and Special Events – Changes to bus service levels on routes which occur because of seasonal ridership changes and event activities served by dedicated temporary bus routes or increased service frequencies.
 - Temporary Route Detours – A short-term change to a route caused by road construction, routine road maintenance, road closures, emergency road conditions, fiscal crisis, civil demonstrations or any uncontrollable circumstance.

Public Participatory Procedures

For all proposed major service changes, City of Phoenix and/or Valley Metro will hold at least one public hearing, with a minimum of two public notices prior to the hearing in order to receive public comments on the potential service changes. The first meeting notice will occur at least 30 days prior to the scheduled hearing date, with the second notice being made at least 10 days prior to the scheduled hearing date. Public materials will be produced in English and Spanish (the metropolitan region's two primary languages), or in other languages upon request, in order to ensure Limited English Proficient (LEP) populations within the transit service area are informed of the proposed service changes and can participate in community discussions. Valley Metro and/or the City of Phoenix will conduct a service equity analysis for the Valley Metro Board of Directors, the City of Phoenix City Council and the public's consideration prior to any public hearings associated with the proposed service changes.

Definitions

Designated Recipient – The City of Phoenix is the designated recipient for federal funds contributing to transit system capital programs and operations in the greater Phoenix metropolitan region.

Disparate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the minority riders or population of the service area.

Disparate Treatment – An action that results in a circumstance in which minority riders or populations are treated differently than others because of their race, color, national origin and/or income status.

Disproportionate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the low-income riders or population of the service area.

Express Transit Service – Includes Valley Metro designated Express bus and RAPID bus services.

High-Capacity Transit (HCT) – A transit facility or service that operates at a consistent, high frequency of service.

Local Transit Service – Includes Light Rail Transit (LRT), local fixed-route bus, local limited stop bus, LINK bus routes and circulator/shuttle bus services.

Low-income Person - means a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services poverty line.

Low-income Areas – A census tract or other geographic bound area that has a higher percentage of low-income persons (defined above) than the overall average percentage of low-income persons in the route service area.

Minority Populations and Areas – Minority populations include those persons who self-identify themselves as being one or more of the following ethnic groups: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian and Other Pacific Islander, as defined in the FTA Title VI Circular. “Minority Areas” are residential land use areas within Census tracts where the percentage of minority persons is higher than the Valley Metro service area average.

Route-Level – Refers to the geographic level of analysis at the route alignment level by which the performance of a transit route is measured for equity.



Route Service Area – A 0.5 mile radial buffer on either side of a transit route's alignment. A 0.75 mile radial buffer is used to ensure compliance with the American's with Disabilities Act guidelines.

Service Level – Refers to the span of service (hours of operation), days of operation, trips and headways (service frequencies) for a transit route or the regional transit system.

Service Area – According to 49 CFR 604.3, geographic service area means “the entire area in which a recipient is authorized to provide public transportation service under appropriate local, state and Federal law.” Valley Metro's service area is considered to be Maricopa County.

Service Span – The span of hours over which service is operated (for example, 6 a.m.–10 p.m.). The service span may vary by weekday, Saturday or Sunday.

Sub-recipient – Valley Metro is a designated sub-recipient of federal funding for capital projects and service operations. Funding is passed on to Valley Metro from the designated recipient, the City of Phoenix.

System-wide – Refers to the geographic level of analysis by which the performance of the entire transit system is measured for equity.

Transit System – A coordinated urban network of scheduled public passenger modes including fixed-route local and express buses, light rail transit, bus rapid transit and circulator bus services that provide mobility for people from one place to another.

Fare Equity Policy

Purpose of the Policy

The purpose of the Fare Equity Policy is to define a threshold for determining whether potential changes to existing transit fares will have a discriminatory impact based on race, color or national origin, or whether a potential fare adjustment will have a disproportionately high or adverse impact on minority and/or low-income populations.

Basis for Policy Standards

Periodically, the City of Phoenix and Valley Metro make adjustments to transit fares in order to generate revenues to help sustain transit service operations. Federal law requires the City of Phoenix and Valley Metro to prepare and submit fare equity analyses for all potential transit fare adjustments, as outlined in Federal Transit Administration (FTA) Circular 4702.1B, effective October 1, 2012.

Fare Equity Policy

The following are the City of Phoenix and Valley Metro policies for determining if a fare adjustment will result in a minority disparate impact or low-income disproportionate impact.

A. Minority Disparate Impact Policy (Fare Equity Analysis)

If a planned transit fare adjustment results in minority populations bearing a fare rate change of greater than 4 percentage points as compared to non-minority populations, the resulting effect will be considered a minority disparate impact.

B. Low-Income Disproportionate Burden Policy (Fare Equity Analysis)

If a planned transit fare adjustment results in low-income populations bearing a fare rate change of greater than 4 percentage points as compared to non-low-income populations, the resulting effect will be considered a low-income disproportionate burden.

Table 8 – Equity Analysis Data Sources

Category	Action	Sub Action	Evaluation Method
Fare	Adjustment	N/A	O/D ^a profile data of affected fare category and/or Census Data
Service Span	Reduction	N/A	O/D ^a profile data of affected route
	Expansion	N/A	
Service Headway	Reduction	N/A	O/D ^a profile data of affected route
	Expansion	N/A	
Route Length	Reduction	N/A	O/D ^a Data
	Expansion	N/A	Census Data
Route Alignment	Reduced Alignment	N/A	O/D ^a Data



Category	Action	Sub Action	Evaluation Method
	Expanded Alignment	N/A	Census Data
	Modified Alignment	Eliminated Segment(s)	O/D ^a Data
		Segment(s) to New Areas	Census Data
New Route	New Route	N/A	Census Data

^a Origin/Destination Survey Data

Public Participatory Procedures

For all proposed fare changes, City of Phoenix and/or Valley Metro will hold at least one public hearing, with a minimum of two public notices prior to the hearing in order to receive public comments on the proposed fare changes. The first meeting notice will occur at least 30 days prior to the scheduled hearing date, with the second notice being made at least 10 days prior to the scheduled hearing date. Public materials will be produced in English and Spanish (the metropolitan region's two primary languages), or in other languages upon request, in order to ensure Limited English Proficient (LEP) populations within the transit service area are informed of the proposed service changes and can participate in community discussions. Valley Metro and/or the City of Phoenix will conduct a fare equity analysis for the Valley Metro Board of Directors, the City of Phoenix City Council and the public's consideration prior to any public hearings associated with the proposed fare changes.

Definitions

Designated Recipient – The City of Phoenix is the designated recipient for federal funds contributing to transit system capital programs and operations in the greater Phoenix metropolitan region.

Disparate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the minority riders or population of the service area.

Disparate Treatment – An action that results in a circumstance in which minority riders or populations are treated differently than others because of their race, color, national origin and/or income status.

Disproportionate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the low-income riders or population of the service area.

Express Transit Service – Includes Valley Metro designated Express bus and RAPID bus services.

High-Capacity Transit (HCT) – A transit facility or service that operates at a consistent, high frequency of service.



Local Transit Service – Includes Light Rail Transit (LRT), local fixed-route bus, local limited stop bus, LINK bus routes and circulator/shuttle bus services.

Low-income Person - means a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services poverty line.

Low-income Areas – A census tract or other geographic bound area that has a higher percentage of low-income persons (defined above) than the overall average percentage of low-income persons in the route-service area.

Minority Populations and Areas – Minority populations include those persons who self-identify themselves as being one or more of the following ethnic groups: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian and Other Pacific Islander, as defined in the FTA Title VI Circular. “Minority Areas” are residential land use areas within Census tracts where the percentage of minority persons is higher than the Valley Metro service area average.

Route Level – Refers to the geographic level of analysis at the route alignment level by which the performance of a transit route is measured for equity.

Route Service Area – A 0.5 mile radial buffer on either side of a transit route’s alignment. A 0.75 mile radial buffer is used to ensure compliance with the American’s with Disabilities Act guidelines.

Service Level – Refers to the span of service (hours of operation), days of operation, trips and headways (service frequencies) for a transit route or the regional transit system.

Service Area – According to 49 CFR 604.3, geographic service area means “the entire area in which a recipient is authorized to provide public transportation service under appropriate local, state and Federal law.”

Service Span – The span of hours over which service is operated (for example, 6 a.m.– 10 p.m.). The service span may vary by weekday, Saturday or Sunday.

Sub-recipient – Valley Metro is a designated sub-recipient of federal funding for capital projects and service operations. Funding is passed onto Valley Metro from the designated recipient, the City of Phoenix.

System-wide – Refers to the geographic level of analysis by which the performance of the entire transit system is measured for equity.



Transit System – A coordinated urban network of public passenger modes including fixed-route local and express buses, light rail transit, bus rapid transit and circulator bus services that provide mobility for people from one place to another.

Public Outreach Process: Major Service Change and Fare Equity Policies (2013)

Valley Metro conducted a public outreach program between January 3 and March 5, 2013, to seek input from the public including minority and low-income populations on the proposed policies. All member agencies were offered the opportunity to participate in the public outreach program that included open dialogue sessions with local public agency committees, commissions and special interest groups.

The first task was to engage a wide variety of stakeholders. Valley Metro presented the proposed policies to commissions and advisory boards focused on disability concerns, human relations and transportation throughout the metropolitan Phoenix area. Valley Metro also held a public meeting in a centralized location in conjunction with stakeholder outreach efforts. The presentations described the policies and meeting attendees were able to ask questions and provide comments. Information about the policies was also distributed at other Valley Metro meetings and outreach events. A public meeting was held to receive community input on the proposed policies. The following list of public outreach events were for member agencies requesting dialogue sessions:

- January 3, 2013 – Phoenix Citizens' Transit Commission
- February 7, 2013 – Tempe Mayor's Commission on Disabilities
- February 12, 2013 – Tempe Human Relations Commission
- February 27, 2013 – Phoenix Mayor's Commission on Disability Issues
- March 5, 2013 – Valley Metro Title VI Policies Public Hearing

To create awareness about the policies and the comment period, Valley Metro placed advertisements in Valley-wide and cultural media newspapers. Notification was also provided through email to Valley Metro's stakeholder database, Valley Metro's social media accounts and a news release to the local media. A fact sheet was developed with examples of how the policies would be implemented, and included a comment form. These materials, along with general information about this effort, were placed on Valley Metro's website. Comments were accepted via mail, email, fax and phone.

**SECTION 10 EVALUATION OF 2015-2018 SERVICE AND
FARE CHANGES AND SITE OR LOCATION OF FACILITIES**



Overview

According to the requirements of Chapter III-13 of the FTA Circular 4702.1B, all recipients are required to conduct a Title VI equity analysis for constructed facilities, such as a vehicle storage facility, maintenance facility, operation center, etc. The Title VI analysis should be done during the planning stage with regard to the location of the facility. Valley Metro did not construct any facilities during this reporting period; therefore, no Title VI equity analysis has been conducted for new facility.

According to the requirements of Chapter IV-10 of the FTA Circular 4702.1B, all transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area of 200,000 or more in population "are required to prepare and submit service and fare equity analyses." Valley Metro is required to evaluate the impacts that would result from a major service change or a fare change to ensure that minority populations are not disparately impacted from these changes and that a disproportionate burden will not be placed on low-income populations.

Valley Metro's adopted major service change and fare change policies are identified in Section 7 above. All fare changes and all service changes that meet Valley Metro's threshold of a major service change that are proposed subsequent to implementation of this Title VI program are subject to an impact analysis to determine whether a disparate impact toward minorities or a disproportionate burden toward low-income populations will occur. Valley Metro also defines its policies for what constitutes a disparate impact and a disproportionate burden (with a distinction between impacts resulting from a fare change or a major service change) in Section 7.

If disparate impacts are found to exist, FTA requires that transit agencies provide further analysis "to determine whether alternatives exist that would serve the same legitimate objectives but with less of a disparate impact." After conducting a thorough analysis, FTA may determine that alternatives and mitigation measures are necessary to ensure such impacts will not disparately affect minority populations. If, however, no feasible alternatives to a service or fare change exist that would otherwise bear less of an impact to minority populations, Chapter IV-16 of the Title VI Circular 4702.1B states that a transit provider may implement the proposed service change if "the transit provider has a substantial legitimate justification for the proposed change" and "the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals."

There were no fare changes between 2015 and 2018. The following Service Change Analyses were conducted between 2015 and 2018 and is in Attachment D:

- Title VI Assessment of Proposed Service Changes for April 2015
- Title VI Assessment of Proposed Service Changes for October 2015
- Title VI Assessment of Proposed Service Changes for April 2016
- Title VI Assessment of Proposed Service Changes for October 2016
- Title VI Assessment of Proposed Service Changes for April 2017



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- Title VI Assessment of Proposed Service Changes for October 2017
 - Title VI Assessment of Proposed Service Changes for April 2018



ATTACHMENT A – Language Assistance Plan



Language Assistance Plan

Title VI Program

July 2018





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 73 million riders annually. Valley Metro provides fixed route bus service, light rail service and complementary paratransit service across the region. Valley Metro distributes transit funds from the countywide transit sales tax to its member agencies including the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, and Maricopa County. For the most part, Valley Metro and its member agencies utilize service providers for operations of bus, light rail and paratransit services. The cities of Glendale, Scottsdale, Peoria, and Phoenix contract some of their service directly to service providers.

The regional transit system has 61 local bus routes, 15 key local bus routes, 1 limited stop peak and 2 limited stop all-day routes, 20 Express/RAPID routes, 18 community circulator routes, one rural connector route, and one light rail system for a total of 103 regional routes. Valley Metro provides Dial-a-Ride service for seniors and persons with disabilities, as well as ADA paratransit service for those who are unable to use fixed route bus service.

Valley Metro and the region supports 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 in order 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 over seventy different languages identified in households where English is not the predominate language. Using the “Four Factor Analysis” prescribed by the 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

The 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 involved 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)

The Factor 1 analysis assessed the number and proportion of persons with limited English speaking proficiency likely to be encountered within the service area, which is defined as a one-half mile radial buffer around all fixed route services. 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 Sources

In accordance with the 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. Determining the presence of LEP populations in the Valley Metro service area was completed through an analysis of several data sources, including:

- U.S. Census Bureau, Census 2000
- U.S. Census Bureau, 2013 American Community Survey (ACS) 5-Year Sample
- U.S. Census Bureau, 2016 American Community Survey (ACS) 5-year Sample

The U.S. Decennial Census 2010 data was not used, as the 2010 Census did not include language specific information on the census forms. The Census 2000 data provides some general information about language groups that is included below; though recognized to be 16 years old. Notably the demographic landscape has transformed since 2000, though this dataset provides a historical comparison and additional insight given the long form of Census 2000 provided more detailed sampling for population characteristics like language proficiency as compared to Census 2010 and the ACS, which is more of a random sample.

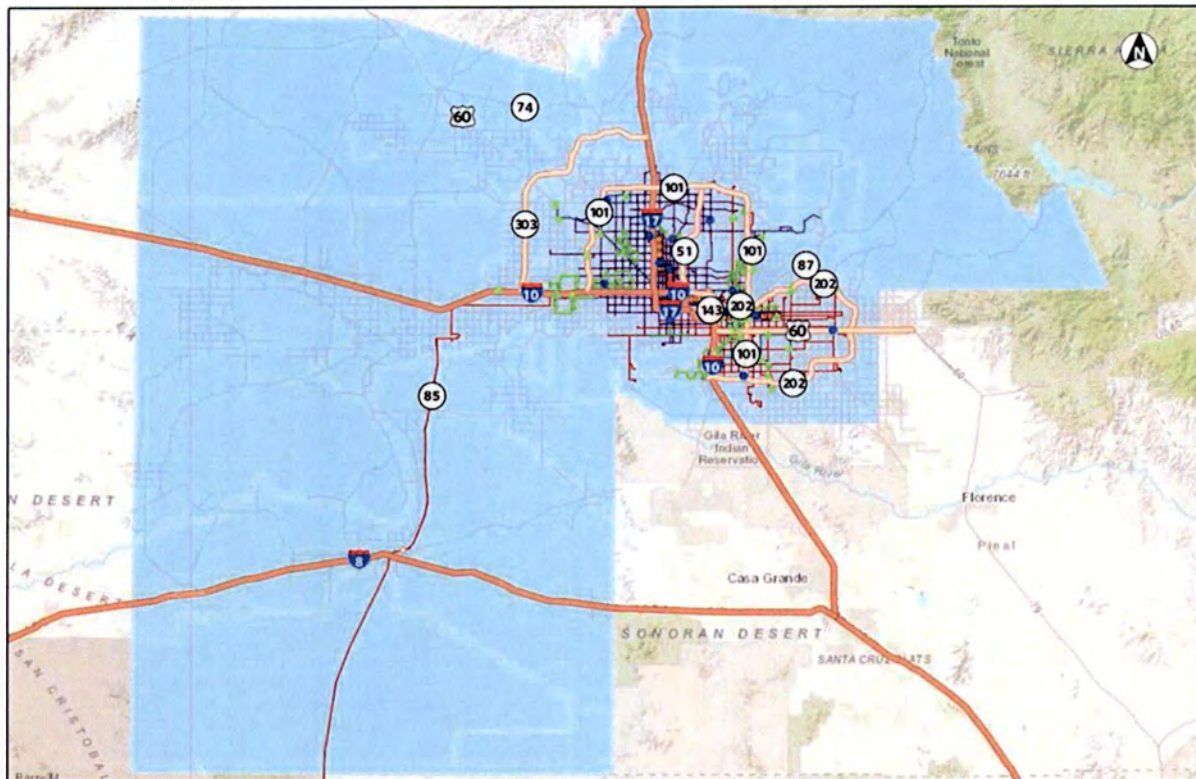
2.2 LEP Population Identification

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 transit service area.

Census 2000

U.S. Decennial Census 2000 provides information about English language proficiency within the Valley Metro service area. The census provides information on languages; recognizably this data is 16 years old and may not reflect the current state of the region. These data are available at the census block group and census tract level. There are 618 census tracts with one-half mile of fixed transit service. Figure 1 depicts the 2018 census tracts within Maricopa County. Census tracts encapsulated within the one-quarter mile buffer are also included in the estimates.

Figure 1: 2018 Maricopa County and Fixed Route Transit Service



The Census 2000 data include the number of persons ages 5 and above who self-identified their ability to speak English as “very well”, “well”, “not well”, and “not at all”. Table 1 shows English proficiency for the County and for Valley Metro’s service area using the Census 2000 data. The table shows that 12.1 percent of the population age 5 and over within the service area reported speaking English less than very well and is considered the overall LEP population. The census tracts within one-half mile of fixed route service have slightly higher population of LEP than Maricopa County.



Table 1: 2000 Census 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	2,832,694	2,148,696	355,963	328,035	11.6%
Census Tracts within ½ -mile fixed routes	2,651,705	1,986,112	344,003	321,590	12.1%

Table 2 displays the data on English language proficiency for the census tracts within one-quarter mile around the fixed route service population ages 5 years and above by the linguistic categories identified by the U.S. Census Bureau, which include Spanish, Indo-European, Asian or Pacific Islander, and All Other Languages. In 2000, the population self-identified as speaking English less than “Very Well” was predominately the Spanish language group, encompassing 10.4 percent of the total population ages 5 years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups comprised 1.7 percent of the population. Of all those speaking English less than very well, the Spanish group comprises 86.0 percent of the total population over age five with limited English proficiency.

These numbers remain mostly consistent through the 2000s. In 2013 and 2016, the number of people that speak English less than “Very Well” dropped from 12.1 percent to about 10 percent (Table 4), however Spanish speakers continue to be the largest group in Maricopa County that self-identifies as speaking English less than “Very Well.” Indo-European, Asian or Pacific Islander, and All Other Languages maintained similar percentages in comparison to the 2000 census data.

Table 2: 2000 Census 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	2,651,705	344,003	133,047	113,289	75,254	12.1%
English	1,986,112	-	-	-	-	0.0%
Spanish	528,613	252,587	103,991	99,549	72,486	10.4%
Indo-European	66,605	47,582	12,276	5,667	1,080	0.7%
Asian or Pacific Islander	44,109	24,273	12,210	6,372	1,254	0.7%
All Other Languages	26,266	19,561	4,570	1,701	434	0.3%



The Census 2000 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” (Census 2000). In total, the Census 2000 Summary File 3 data identified 1,048,128 households. The entire membership of a linguistically isolated household would be considered LEP. Table 3 details those data for linguistically and non-linguistically isolated households by language category.

Table 3: 2000 Census Data by Linguistically Isolated Households

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census Tracts 1/2 mile fixed routes	1,053,667	62,471	201,748	5.9%
English	788,723	-	-	-
Spanish	190,507	51,213	139,294	4.9%
Indo-European	40,883	5,161	35,498	0.5%
Asian or Pacific Islander	20,853	4,744	16,109	0.5%
All Other Languages	12,701	1,405	11,296	0.1%

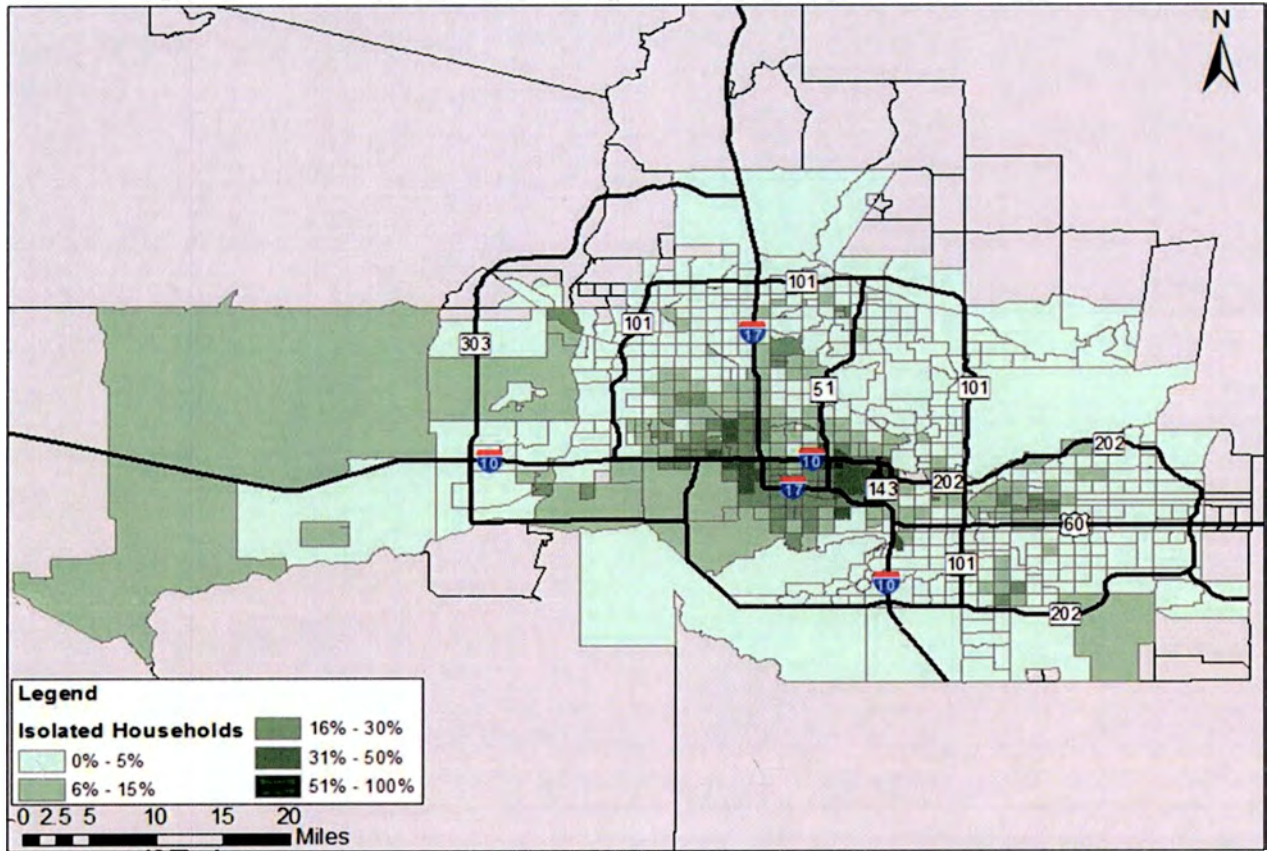
Within the fixed route transit area 5.9 percent of households are considered linguistically isolated. Again, these are predominately Spanish households making up 4.9 percent of the total. Remaining languages comprise 1.1 percent of households that are classified as linguistically isolated.

Figure 2 shows a map depicting the concentrations of linguistically isolated households in census tracts within 0.5-mile of fixed route service. Most areas throughout the region are mixed, though there are a few pockets of Census blocks that have concentrations of linguistically isolated households, thus identified as persons with limited English proficiency.

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 via 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 ACS data from 2013 and 2016 to show changes over time, especially since the decennial 2010 census did not provide this information.

Figure 2: Census Tracts with Linguistically Isolated Households

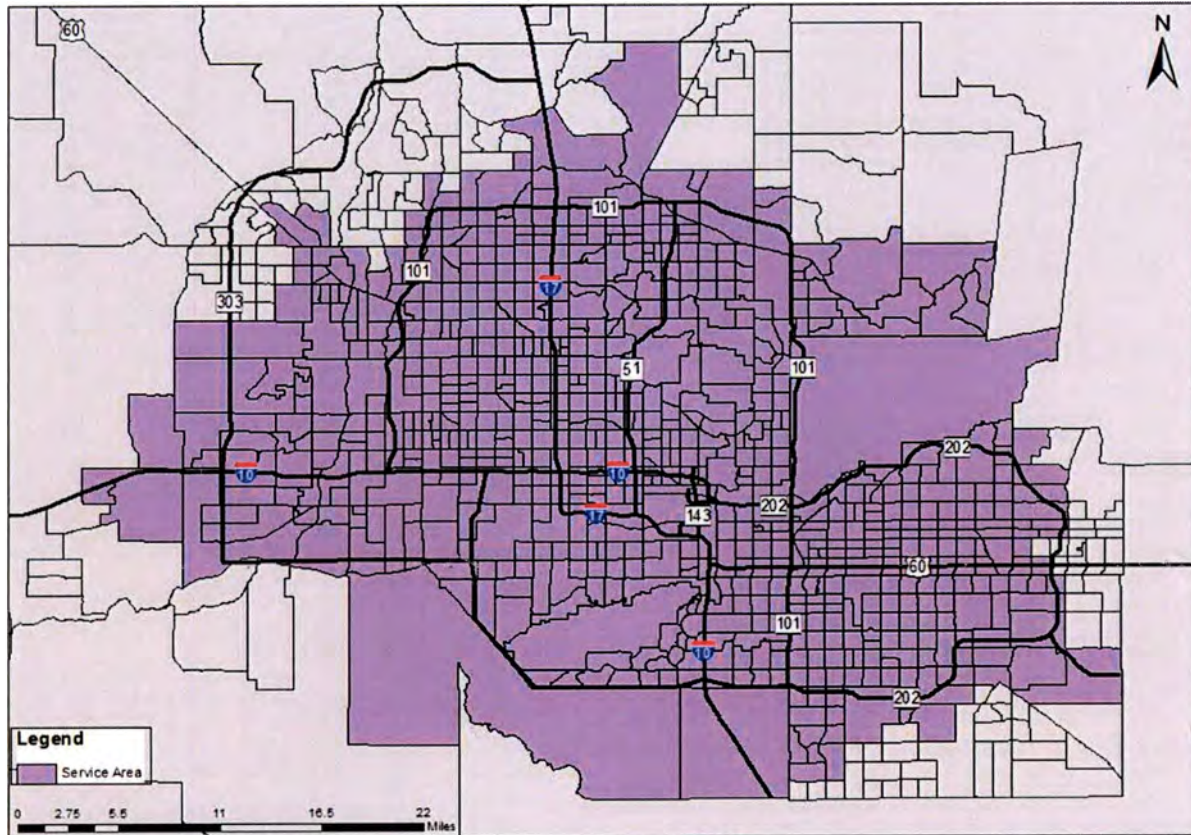


Source: Census 2000

Figure 3 shows the ACS 2013 census tracts within the 0.5-mile buffer of transit routes. Census tracts encapsulated within this area are included in the estimates though they may not be within a 0.5-mile of a fixed route.

Table 4 shows English proficiency for the County and for Valley Metro's service area using the ACS 2013 and 2016 data. The ACS 2013 data estimates the population age 5 years and older within the service area to be 3,051,428 with 340,076, or 11.1 percent, of the population is LEP. The ACS 2016 data estimate the population age 5 years and older within the service area to be 3,154,617 with 330,125, or 10.5 percent, of the population is LEP. The census tracts within one-half mile of fixed route service have slightly higher population of LEP than Maricopa County.

Figure 3: 2015 Census Tracts within One-Quarter Mile of Fixed Route Service (ACS 2016)



Source: ACS 2013

Table 4: ACS 2013 and 2016 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	
2013 ACS					
Maricopa County	3,610,510	2,660,946	589,679	359,884	10.0%
Census Tracts 1/2-mile fixed routes	3,051,428	2,171,136	540,216	340,076	11.1%
2016 ACS					
Maricopa County	3,812,399	2,804,227	646,236	354,052	9.29%
Census Tracts 1/2-mile fixed routes	3,154,617	2,229,062	595,430	330,125	10.46%



Table 5 displays the data on English language proficiency for the census tracts within the one-quarter mile around the fixed route service population ages 5 years and above by the linguistic categories identified by the U.S. Census Bureau, which include Spanish, Indo-European, Asian or Pacific Islander, and All Other Languages. Predominately the population self-identified as speaking English less than “Very Well” is of Spanish language group, encompassing 9.1 percent (2013 ACS data) and 8.3 percent (2016 ACS data) of the total population ages 5 years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups comprised 2.1 percent of the population for both the 2013 and 2016 ACS data. Of all those speaking English less than very well, the Spanish group comprises 81.0 percent (2013 ACS) and 79.0 (2016 ACS) of the total population percent over age five with limited English proficiency.

Table 5: 2013 and 2016 ACS Census 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	
2013						
Total	3,002,765	536,151	140,541	126,210	71,269	11.2%
English	2,128,594	-	-	-	-	0.0%
Spanish	687,532	413,750	102,250	106,330	65,202	9.1%
Indo-European	75,146	56,623	12,386	5,048	1,089	0.6%
Asian or Pacific Islander	73,402	40,115	18,746	10,946	3,595	1.1%
All Other Languages	38,091	25,663	7,159	3,886	1,383	0.4%
2016						
Total	3,154,617	595,430	134,971	117,834	77,320	10.4%
English	2,229,062	-	-	-	-	0.0%
Spanish	725,756	463,540	94,718	97,718	69,780	8.3%
Indo-European	74,471	55,554	12,484	4,611	1,822	0.6%
Asian or Pacific Islander	81,683	46,873	19,589	11,272	3,949	1.1%
All Other Languages	43,645	29,463	8,180	4,233	1,769	0.4%

The 2016 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 2016). In total, the 2016 ACS data identified 1,380,916 households. The entire membership of a linguistically isolated household would be considered LEP. Table 6 details those data for linguistically and non-linguistically isolated households by language category.



Table 6: 2016 ACS Data by Linguistically Isolated Households

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census Tracts 1/2 mile fixed routes	1,380,916	63,166	1,317,750	4.6%
English		-	-	-
Spanish	251,862	47,618	204,244	3.4%
Indo-European	40,663	4,417	32,917	0.3%
Asian or Pacific Islander	34,811	7,746	27,065	0.6%
All Other Languages*		3,385		

*The ACS 2016 Data did not provide the number of total households for linguistically isolated households

The 2013 ACS data show 19 languages or language groups with 1,000 or more LEP persons and the 2016 ACS data show 12 languages or language groups with 1,000 or more LEP persons. However, only one LEP population exceeds 5 percent of the total population of persons eligible to be served or likely encountered. Table 7 shows the populations that meet either of these thresholds using ACS 2013 population by language and ability, sorted by percentage of LEP population.

Within one-half mile of fixed route service, the majority of the 2013 LEP population is the Spanish speaking population; this is the only language group to exceed 5 percent of the LEP population. The Spanish LEP population consists of 275,370 persons within the service area. The Chinese and Vietnamese speaking population followed with 2.65 percent and 2.76 percent respectively, both were approximately 9,000 persons. There are 4,908 Arabic speaking LEP persons or 1.44 percent of the LEP population. The fifth largest LEP population is Tagalog consisting of 4,114 people, or 1.21% of the LEP population within the service area.

The 2016 LEP population is also the Spanish speaking population that consists of 262,216 persons (77 percent) within the service area. The Chinese and Other Indo-European speaking population followed with 3.0 percent and 2.97 percent respectively, both were approximately 10,000 persons. There are 9,287 Vietnamese speaking LEP persons or 2.74 percent of the LEP population. The fifth largest LEP population is Other Asian Pacific Island consisting of 8,210 people, or 2.43 percent of the LEP population within the service area.

The ACS 2016 LEP populations within the service area are very similar to the 2013 ACS LEP populations.

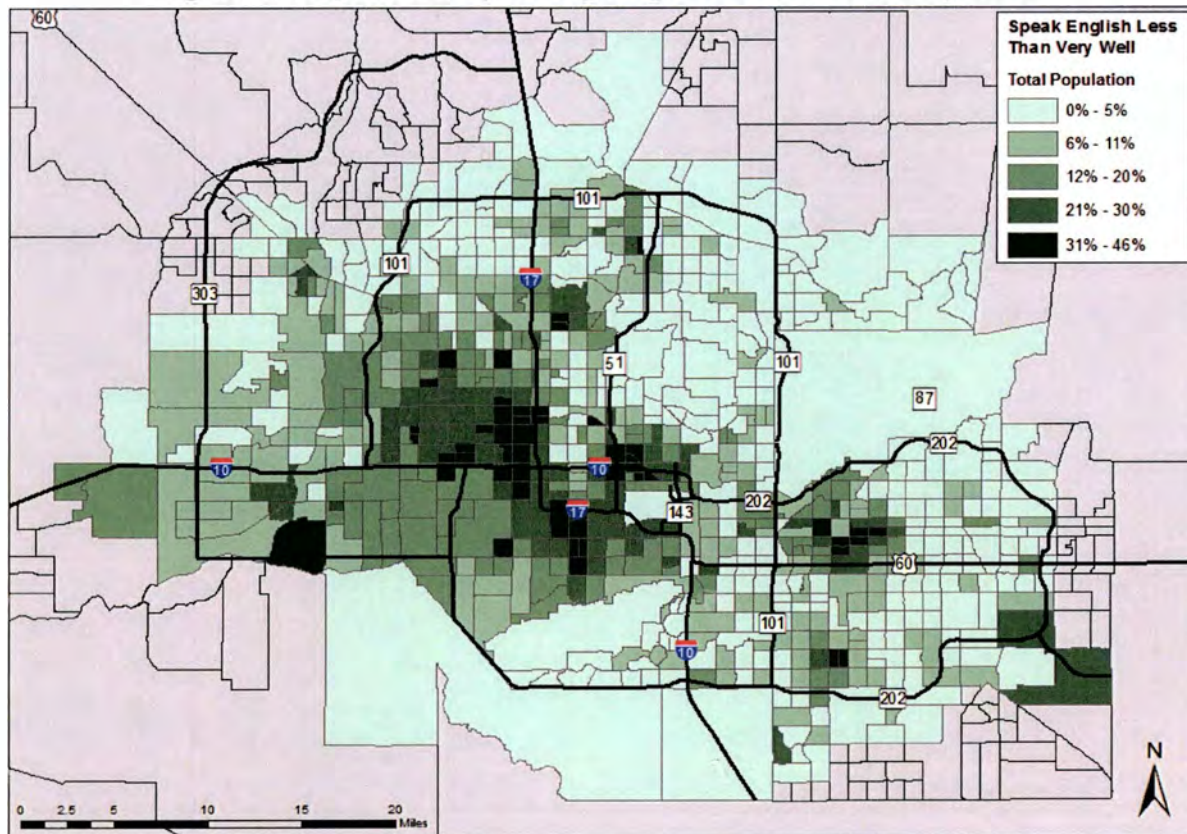
Figure 4 shows a map depicting the concentrations of population speaking English Less than Very Well throughout the service area. Most areas throughout the region are mixed, though there are a few pockets of Census blocks that have concentrations of persons with limited English proficiency.



Table 7: 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		
ACS 2013				
All Languages	340,076	-	-	100%
Spanish	275,370	416,599	691,969	81.0%
Chinese	9,005	8,305	17,310	2.65%
Vietnamese	9,391	5,669	15,060	2.76%
Arabic	4,908	7,552	12,460	1.44%
Tagalog	4,114	8,918	13,032	1.21%
Other Asian	3,549	7,208	10,757	1.04%
African	3,301	4,485	7,786	0.97%
Korean	3,105	3,568	6,673	0.91%
Serbo-Croatian	2,833	4,177	7,010	0.83%
Other Languages	2,227	1,844	4,071	0.65%
Other Indo European	2,132	3,494	5,636	0.63%
Other Indic	1,894	3,989	5,883	0.56%
French	1,788	7,299	9,087	0.53%
Persian	1,788	2,821	4,609	0.53%
Other Pacific Island	1,278	3,037	4,315	0.38%
Russian	1,245	3,017	4,262	0.37%
Japanese	1,236	2,474	3,710	0.36%
Navajo	1,183	7,348	8,531	0.35%
German	1,199	9,624	10,823	0.35%
ACS 2016				
All Languages	338,335	-	-	100%
Spanish	262,216	463,540	725,756	77.50%
Chinese (includes Mandarin and Cantonese)	10,165	9,666	19,831	3.00%
Vietnamese	9,287	6,665	15,952	2.74%
Arabic	6,283	10,086	16,369	1.86%
Tagalog (includes Filipino)	4,512	9,750	14,262	1.33%
Korean	2,636	3,094	5,730	0.78%
Other Languages	7,899	19,377	27,276	2.33%
Other Indo European	10,057	27,339	37,396	2.97%
French, Haitian, or Cajun	2,105	6,999	9,104	0.62%
Other Asian Pacific Island	8,210	17,698	25,908	2.43%
Russian, Polish, or Other Slavic	5,559	11,443	17,002	1.64%
German or Other West Germanic	1,196	9,773	10,969	0.35%

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 was overwhelmingly Spanish; followed by Chinese, Vietnamese, Arabic, and Tagalog. 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) Person” (USDOT 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

In an effort to determine the frequency that LEP persons interact with the agency, 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 Survey
- 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

With about a quarter of the region speaking more than only English, Valley Metro recognizes the value of providing convenient and efficient information to transit riders. Understanding how often LEP persons are utilizing services will assist in serving customers better in the future with quality services, programs, and activities.

Transit Employee Survey

An employee survey was performed in an effort to determine how often those employees in contact with transit riders regularly encounter LEP persons. During late June-July 2018, a voluntary survey of customer service and transit employees was conducted regarding the interaction with LEP persons and languages spoken. A copy of the survey instrument can be found as Appendix B. The Valley Metro Customer Service Representatives provide passenger assistance most commonly through email, but also via the phone. In addition, there are several Customer Service Representatives that are dedicated for fare sales, transit information, or are stationed at transit passenger facilities¹ to provide assistance to passengers. Employees surveyed were of one of the following locations:

- Customer Service Representatives and public-facing Mobility Center Staff
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center

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

- Sunnyslope Transit Center
- Tempe Transportation Center

In total 33 respondents provided information about their experiences. Approximately 85% of those surveyed were employed at the Mobility and Customer Service Center.

When asked if representatives have had any requests for materials in another language, 70% responded yes they had encountered a request; see Figure 5. Of these, most interpretation or translation requests were for Spanish.

By cross-referencing the locations of respondents with responses that language assistance had been requested, all but one location had received requests: only Sunnyslope Transit Center reported having no foreign language encounters.

Languages requested were predominately Spanish (88%) followed by French (8%) and Russian (4%). See Figure 6 for a full breakdown of the languages requested.

Figure 5: Requests for Information or Materials in Another Language

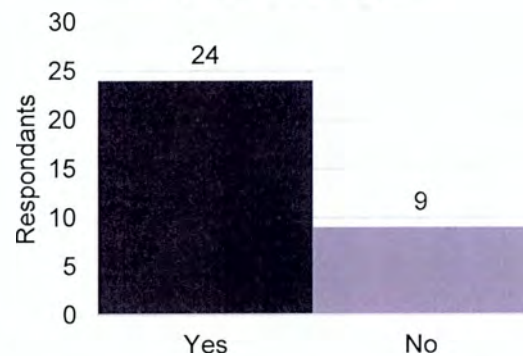
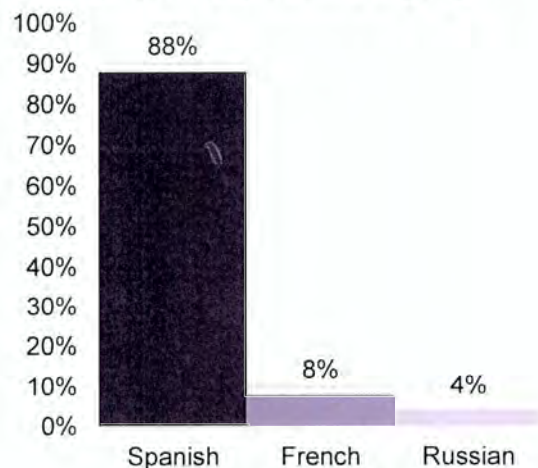
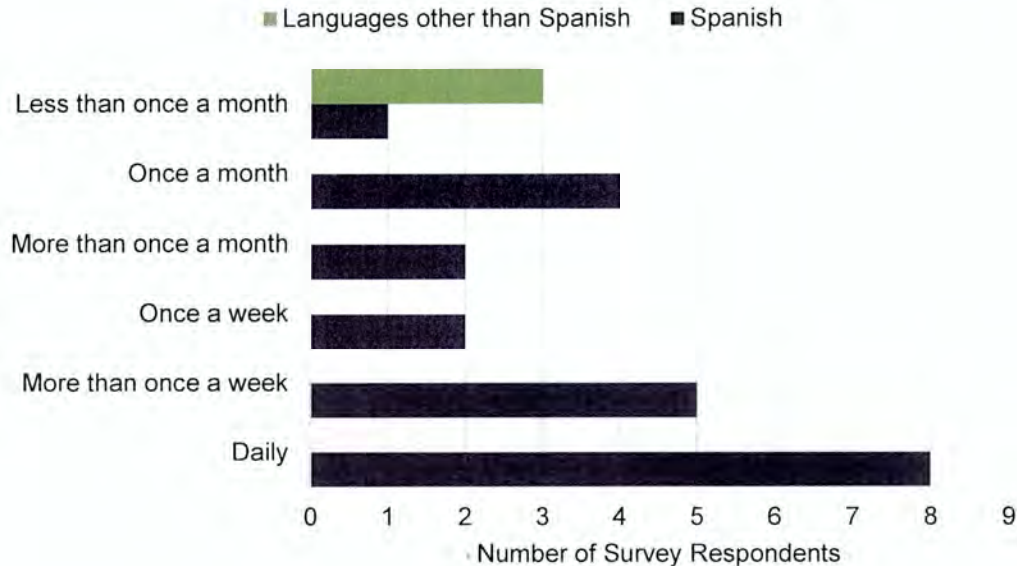


Figure 6: Requested Languages



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. Additionally, languages other than Spanish were requested at a less frequent rate.

Figure 7: Language Requested by Frequency



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

Customer Service Interactive Voice Response (IVR) Call Log

The Customer Service Center updated the automated phone system mid-2014 to establish the Interactive Voice Response (IVR) feature. With this expansion, the new system is able to provide a log to which line callers have requested to be transferred. Available are six topic categories, each in English and Spanish for twelve options total. The topics available include:

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

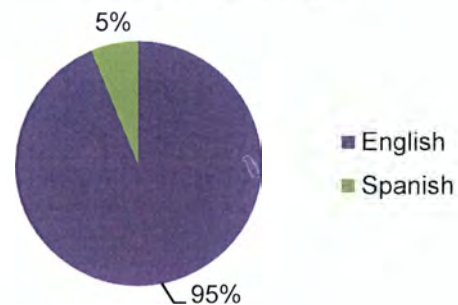
This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative reducing the time it takes to be served in the preferred language. Beyond being more convenient and helpful, this system also is more efficient by reducing the likelihood callers may be redirected to a bilingual representative. Currently, 13 bilingual customer service representatives are employed by Valley Metro. The new phone system prioritizes selection of Spanish calls received. Table 7 below shows the distribution of calls by option selected, followed by the sum of calls by language for calendar year 2017.

Table 7: 2017 Customer Service Call Log

	Total Calls	% of Total Calls
ADA-English	31,965	2.63%
ADA-Spanish	308	0.03%
CR-English	161,751	13.29%
CR-Spanish	3,622	0.30%
Light Rail-English	111	0.01%
Light Rail-Spanish	16	0.00%
Lost Found-English	10,889	0.89%
Lost Found-Spanish	114	0.01%
TI-English	951,389	78.14%
TI-Spanish	57,331	4.71%
English	1,156,105	94.96%
Spanish	61,391	5.04%
Total Calls	1,217,496	100.00%

Figure 8 shows a pie chart of the calls by language. Approximately 95% of calls were for English and 5% of calls were for Spanish. At the time of this report, 38 customer service representatives were currently on staff; of these, thirteen are bilingual (34%).

Figure 8: Customer Service Calls by Language



When evaluating the customer service call logs, the bulk of calls received are through the English phone lines with a small portion (5%) 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 is provided at community or special events including environmental fairs, 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. For more-comprehensive training, monthly sessions are held at Ability360 on the third Wednesday of the month. These sessions include a presentation, bus demo and ride and a light rail ride. Participants are issued an all-day pass for this mobility training.

Presentations are made to various refugee groups. Due to the varied backgrounds of the participants, the hosting organizations generally provide necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help



bridge the language issues. The many Spanish speaking passengers are accommodated as much of the transit information is available in Spanish.

Website Translation

Apart from accessing information via transit employees whether by phone, email, in person or another method, many customers utilize the www.valleymetro.org website for information. During this time the website was equipped with the Google Translate feature, which allows translation into 90 languages. Users have translated the Valley Metro website into 36 different languages using this feature. Approximately 99% of sessions were utilizing the default English setting. The remaining 1% was comprised of 35 other languages. Table 8 provides an itemization of the languages translated and the percentage of sessions. Note that only languages comprising at least 0.01% of total sessions are included below; a full table of entries is available in Appendix C.

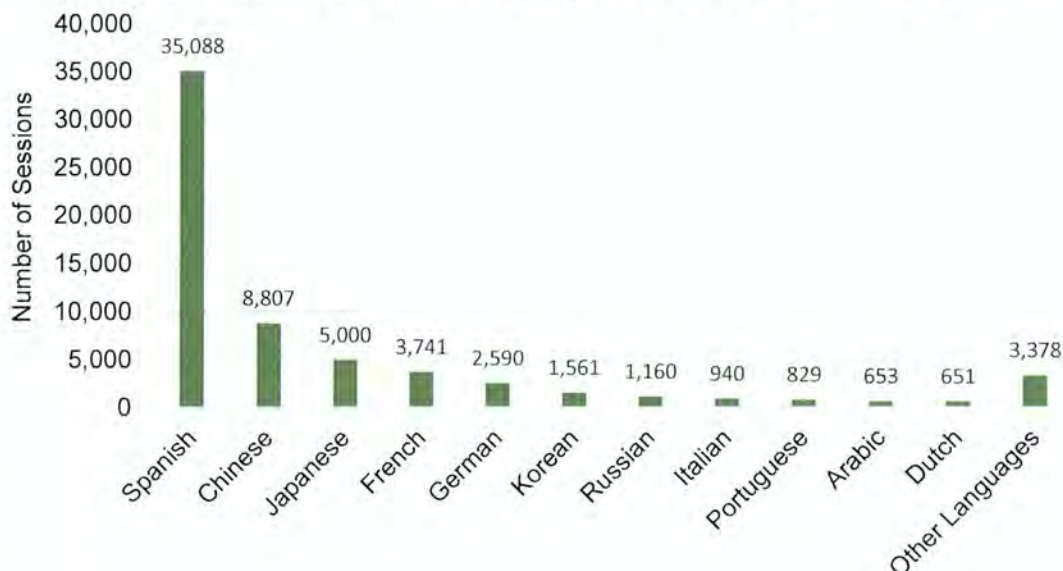
Table 8: Website Sessions by Language²

Language	Number of Sessions	Percent of Total Sessions
English	8,289,256	99.23%
Spanish	35,088	0.42%
Chinese	8,807	0.11%
Japanese	5,000	0.06%
French	3,741	0.04%
German	2,590	0.03%
Korean	1,561	0.02%
Russian	1,160	0.01%
Italian	940	0.01%
Portuguese	829	0.01%
Arabic	653	0.01%
Dutch	651	0.01%

Once again, Spanish was overwhelmingly the most utilized language with the website translation service comprising 0.42% of sessions, followed by Chinese (0.11%), Japanese (0.06%), French (0.04%), and German (0.03%). See Figure 9 below for a chart of the number of translated sessions by language.

² Valley Metro. (2015). Language [Data file]. Available from <http://www.google.com/analytics/ce/mws/>

Figure 9: Number of Translated Website Sessions by Language



The website was translated to an additional 25 other languages that each comprises less than 0.01% of the sessions; collectively these viewings attribute to 0.04% of all sessions. These languages include:

- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Farsi
- Finnish
- Greek
- Hebrew
- Hungarian
- Indonesian
- Latin
- Norwegian
- Polish
- Romanian
- Serbian
- Slovak
- Swedish
- Tagalog
- Thai
- Tonga
- Turkish
- Ukrainian
- Vietnamese

Persons around the region utilize the website to gather information in languages from around the world using the Google Translate feature. The majority of translated sessions are for the Spanish language (0.42%).

Furthermore, many documents uploaded to Valley Metro's website are translated into Spanish since they are disseminated as paper materials to the public. Individuals may utilize these documents without translating the website into Spanish, but rather use the Google Translate feature. Some of these documents include project updates, route maps and schedules, instructions and applications for a Reduced Fair 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 conducted revealed that 72% of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 88% of respondents reported requests for Spanish. The Customer Service Call Log, though limited, showed that a mere 5% of customers utilized one of the six 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 0.77%% of sessions were translated; approximately half of which were translated to Spanish. The website was translated to 36 different languages. Overall, there is broad diversity within the Phoenix region that accesses regional transit services, however; these are predominately English and Spanish speaking individuals.

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 received from community organizations was used to identify ways to improve these services for LEP populations. The U.S. Department of Transportation (USDOT) "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (USDOT 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. The input from community



organizations and LEP persons were 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. Typically, 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
 - Project updates
 - Title VI forms
 - Large special events materials (e.g. Super Bowl public materials)
- Direct mailers or door hangers for targeted outreach
- Ticket vending machines (Spanish and Braille)
- Bilingual customer service staff
- Email List Serv Messages
- Bus specific services:
 - Car cards (on-board advertisements)
 - Bus signs (i.e. priority seating, caution signs, entry/exit, etc.)
 - Variable message sign that displays announcements on buses
- Light Rail specific services:
 - LRT vehicle signage including priority seating, manners, and other train information
 - VMS 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 utilize 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 utilize transit, manners, priority seating, caution signs, and exit locations on vehicles. Ticket vending is available in both Spanish and Braille. Emergency notification measures are also translated, including audio VMS³ 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 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. These organizations indicated that they serve populations speaking a broad range of languages, including Spanish, Arabic, Somali, Chinese, Burmese and French. The organizations interviewed range from cultural adult centers to refugee services organizations:

- o Catholic Charities
- o Friendly House
- o Refugee Focus
- o Arizona Immigration Refugee Services (AIRS)
- o Chinese Senior Center
- o Hope VI

³ Variable message signs
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Key findings from outreach effort:

- Public transportation is the main form of transportation to access jobs, medical appointments, social services, grocery shopping and school.
- Many of the organizations provide an orientation to transportation services and also provide free transit passes for employment searches.
- Two primary challenges with the public transportation system were voiced, which related to route location and schedule.
 - The schedule does not accommodate early morning or late night shifts.
 - The transit system does not travel to all locations, especially those on the outer reaches of the Phoenix metropolitan region.

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 2007b). Organizations interviewed expressed needs of LEP populations regarding language assistance including:

- **System Map Information:** LEP populations have expressed a difficulty in understanding and familiarizing themselves with system maps.
- **On-Board Messaging:** LEP populations have expressed hardship in reading and understanding on-board signage/message boards as well as driver instructions.
- **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.

Valley Metro continues to make improvements in language assistance for the LEP population in the region in all areas including the three identified above.

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

The final step of the four-factor LEP analysis is 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” (USDOT 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. Valley Metro will evaluate how to consolidate its language assistance measures to deliver the most cost-effective services.

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 a standing on-call contract for any interpretation needs. Any production costs are included in printing and public meetings budgets. Furthermore, there are bilingual employees that provide intermittent language assistance needs as part of their other duties. Specifically, the Public Relations team has two employees (33% of the department staff) that are bilingual. These employees may be assigned to prepare press releases or media events with Spanish-speaking publications in addition to their typical duties. These soft costs are not tracked, though most of the formal interpretation services are contracted.

Interpreters are contracted 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's current contract for interpreters at public meetings allow for approximately \$200 per meeting. Annually \$5,000-\$6,000 is spent for interpreters to staff meetings and public hearings for various projects and efforts. In addition, \$800-\$1,200 is spent annually for sign language interpreters at requested meetings and public hearings. Costs for translating and



producing materials like meeting notices, display boards, news releases, and project update sheets are also budgeted annually; approximately \$14,000 - \$15,000. In total, approximately \$20,000 - \$25,000 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 soft costs include other staff time utilized on an ad hoc or regular basis to provide translation or interpretive services. Over thirty percent of Public Relations and Customer Service Representatives are bilingual, servicing Spanish-speaking customers as well as English-speaking customers. Being bilingual is a preferred qualification when hiring customer service staff though not required. There are also bilingual employees that may assist on an informal, ad hoc basis to communicate with LEPs 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 practiced 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
- translated vital documents currently posted on <valleymetro.org>

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

- creating a one-stop 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. The summary above portrays more insight of the interviews conducted. Services requested were centered on service expansions that included increased frequencies and later services at night. However, these would be greater 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 is also shown using VMS⁴ 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. The feasibility and helpfulness of VMS translation should be evaluated.

As applicable, through the annual budget process, additional services requested or identified may be considered for implementation. In 2015, Valley Metro has shifted to a zero based budget that is approved by two appointed boards: Valley Metro Rail Board and the Valley Metro Regional Public Transportation Authority Board of Directors. Year by year the budget is developed as appropriate to the unique needs and demands of the 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 symbolism 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 symbolism, it is expected that the need for enhancing the on-board messaging and system map information may be reduced. Furthermore, these could be

⁴ LINK stations, light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities



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

As discussed earlier in this Language Assistance Plan, Valley Metro currently provides both oral and written language assistance. Oral language assistance includes bilingual customer service representatives, speaking Spanish. Additionally, Spanish interpreters are available at public meetings; sign language and other language interpreters are available as requested. On vehicles and at stations, VMS announcements are also in Spanish.

Written Spanish language assistance includes signage, 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. The website is equipped with the Google Translate feature, which allows translation into 5 languages (www.translate.google.com). Fare vending machines provide Spanish and Braille translations as well.

Notices to the public of language assistance measures are typically provided side-by-side 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 commonly 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 ask if Spanish is the preferred language automatically prior to being connected with a representative.

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 those 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 the query is not able to be responded to immediately, any response is assigned to another bilingual representative. This training is implanted 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 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, and
- 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, it is expected that through the monitoring, evaluation, and update process that additional services continue to be identified and 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 monitoring and update process of this plan.

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

Triennially Valley Metro will review, monitor, and update this LAP. 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 2007b). Using this checklist periodically, stations, vehicles, customer service, community outreach, and public relations are monitored.

Using this information, changes may be made to the language assistance plan recognizing any cost implications and resources available. Depending on this 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 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 "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Person" (USDOT 2005), and the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007b). 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 – FULL LIST OF LANGUAGES

ACS 2016 population by language and ability: cells shaded purple in this table meet either the 1,000 persons threshold or the 5% threshold of the total population of persons eligible to be served or likely encountered.

Language Category Group	Total Population	Percent age of Total LEP Population
All Languages Speaks English Less Than Very Well (LEP Population within Service Area)	791,547	-
Spanish	808,412	-
Spanish Speak English Very Well	528,695	-
Spanish Speak English Less Than Very Well	279,717	35.34%
French (Including Cajun)	10,704	-
French Speak English Very Well	8,109	-
French Speak English Less Than Very Well	2,595	0.33%
Haitian	357	-
Haitian Speak English Very Well	253	-
Haitian Speak English Less Than Very Well	104	0.0001%
Italian	4,565	-
Italian Speak English Very Well	3,541	-
Italian Speak English Less Than Very Well	1,024	0.13%
Portuguese	2,335	-
Portuguese Speak English Very Well	2,180	-
Portuguese Speak English Less Than Very Well	155	0.0001%
German	11,223	-
German Speak English Very Well	10,177	-
German Speak English Less Than Very Well	1,046	0.13%
Yiddish, Pennsylvania Dutch, or Other West Germanic	1,605	-
Yiddish Speak English Very Well	1,605	-
Yiddish Speak English Less Than Very Well	0	0.00%
Greek	1,140	-
Greek Speak English Very Well	1,052	-
Greek Speak English Less Than Very Well	88	0.0001%
Russian	3,153	-
Russian Speak English Very Well	2,578	-
Russian Speak English Less Than Very Well	575	0.0007%
Polish	5,665	-
Polish Speak English Very Well	4,083	-
Polish Speak English Less Than Very Well	1,582	0.19%
Serbo-Croatian	5,431	-
Serbo-Croatian Speak English Very Well	4,228	-



Language Category Group	Total Population	Percent age of Total LEP Population
Serbo-Croatian Speak English Less Than Very Well	1,203	0.15%
Ukrainian or Other Slavic	3,652	-
Other Slavic Speak English Very Well	2,860	-
Other Slavic Speak English Less Than Very Well	792	0.10%
Armenian	474	-
Armenian Speak English Very Well	209	-
Armenian Speak English Less Than Very Well	265	0.0003 %
Farsi or Dari	6,866	-
Persian Speak English Very Well	4,102	-
Persian Speak English Less Than Very Well	2,764	0.35%
Gujarati	3,044	-
Gujarati Speak English Very Well	2,366	-
Gujarati Speak English Less Than Very Well	678	0.0008 %
Hindi	10,858	-
Hindi Speak English Very Well	8,868	-
Hindi Speak English Less Than Very Well	1,990	0.25%
Urdu	2,026	-
Urdu Speak English Very Well	1,812	-
Urdu Speak English Less Than Very Well	214	0.0003 %
Nepali, Marathi, or Other Indic	3,675	-
Other Indic Speak English Very Well	2,405	-
Other Indic Speak English Less Than Very Well	1,270	0.16%
Punjabi	1,462	-
Punjabi Speak English Very Well	808	-
Punjabi Speak English Less Than Very Well	654	0.0008 %
Bengali	1623	-
Bengali Speak English Very Well	1022	-
Bengali Speak English Less Than Very Well	601	0.0008 %
Other Indo European	10,187	-
Other Indo European Speak English Very Well	6,915	-
Other Indo European Speak English Less Than Very Well	3,272	0.41%
Chinese	25,847	-
Chinese Speak English Very Well	12,518	-
Chinese Speak English Less Than Very Well	13,329	1.68%
Japanese	3,604	-
Japanese Speak English Very Well	2,677	-
Japanese Speak English Less Than Very Well	927	0.12%
Korean	6,412	-



Language Category Group	Total Population	Percent age of Total LEP Population
Korean Speak English Very Well	3,160	-
Korean Speak English Less Than Very Well	3,252	0.90%
Vietnamese	18,703	-
Vietnamese Speak English Very Well	8,215	-
Vietnamese Speak English Less Than Very Well	10,488	1.31%
Khmer	1,559	-
Khmer Speak English Very Well	736	-
Khmer Speak English Less Than Very Well	823	0.10%
Telugu	6,379	-
Telugu Speak English Very Well	5,594	-
Telugu Speak English Less Than Very Well	785	0.0009 %
Tamil	3,872	-
Tamil Speak English Very Well	3,374	-
Tamil Speak English Less Than Very Well	498	0.0006 %
Malayalam, Kannada, or other Dravidian languages	2,988	-
Malayalam, Kannada, or other Dravidian languages Speak English Very Well	2,644	-
Malayalam, Kannada, or other Dravidian languages Speak English Less Than Very Well	344	0.0004 %
Thai, Lao, or Other Tai-Kadai Languages	2,848	-
Thai, Lao, or Other Tai-Kadai Languages Speak English Very Well	1,893	-
Thai, Lao, or Other Tai-Kadai Languages Speak English Less Than Very Well	955	0.12%
Other Asian	3,838	-
Other Asian Speak English Very Well	2,308	-
Other Asian Speak English Less Than Very Well	1,530	0.19%
Tagalog (Including Filipino)	18,812	-
Tagalog (Including Filipino) Speak English Very Well	13,344	-
Tagalog (Including Filipino) Speak English Less Than Very Well	5,468	0.69%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	6,677	-
Ilocano, Samoan, Hawaiian, or other Austronesian languages Speak English Very Well	5,377	-
Ilocano, Samoan, Hawaiian, or other Austronesian languages Speak English Less Than Very Well	1,300	0.16%
Navajo	11,895	-
Navajo Speak English Very Well	10,812	-
Navajo Speak English Less Than Very Well	1,083	0.14%
Other Native North American	4,099	-
Other Native North American Speak English Very Well	3,776	-
Other Native North American Speak English Less Than Very Well	323	0.0004 %
Yoruba, Twi, Igbo, or other languages of Western Africa	4,071	-



Language Category Group	Total Population	Percentage of Total LEP Population
Yoruba, Twi, Igbo, or other languages of Western Africa Speak English Very Well	3,215	-
Yoruba, Twi, Igbo, or other languages of Western Africa Speak English Less Than Very Well	856	0.11%
Arabic	25,913	-
Arabic Speak English Very Well	15,535	-
Arabic Speak English Less Than Very Well	10,378	1.46%
Hebrew	1,925	-
Hebrew Speak English Very Well	1,612	-
Hebrew Speak English Less Than Very Well	313	0.0004%
Amharic, Somali, or other Afro-Asiatic languages	7,343	-
Amharic, Somali, or other Afro-Asiatic languages Speak English Very Well	4,348	-
Amharic, Somali, or other Afro-Asiatic languages Speak English Less Than Very Well	2,995	0.38%
Swahili or other languages of Central, Eastern, and Southern Africa	6,764	-
Swahili or other languages of Central, Eastern, and Southern Africa Speak English Very Well	3,180	-
Swahili or other languages of Central, Eastern, and Southern Africa Speak English Less Than Very Well	3,584	0.45%
Other Languages	2,321	-
Other Languages Speak English Very Well	1,793	-
Other Languages Speak English Less Than Very Well	528	0.0006%