
Title VI Implementation Plan



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Title VI Policy Statement

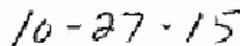
The City of Surprise is committed to ensuring that no person is discriminated against on the grounds of color, race, or national origin as provided by Title VI of the Civil Rights Act of 1964 and related legislation. This purpose of this policy is to ensure full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Specifically, Title VI provides that “no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any program or activity receiving federal financial assistance; this includes City of Surprise sponsored transit-related programs or activities, regardless of the sources of funding.

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

When City of Surprise distributes Federal-aid funds to another entity/person, the City of Surprise will ensure all sub-recipients fully comply with City of Surprise Title VI nondiscrimination program requirements. The City Manager has delegated the authority to City of Surprise TITLE VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Bob Wingenroth
City Manager



Date

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI City of Surprise

The City of Surprise operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). For more information on the City of Surprise or Valley Metro's obligations under Title VI, and the procedures to file a complaint, contact Scott Bailey, the City of Surprise Title VI Coordinator at 623-222-1000, (TTY 623-222-1002); email hr@surpriseaz.gov; or visit our administrative office at 16000 N. Civic Center Drive, Surprise AZ 85374. For more information, visit <http://www.surpriseaz.gov/index.aspx?NID=2891>.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Valley Metro Customer Service, (602) 253-5000 (TTY: (602) 251-2039, ValleyMetro.org, Via e-mail at csr@valleymetro.org or by mailing the complaint to Valley Metro Customer Service, 4600 E. Washington Street, Suite 101, Phoenix, AZ 85304.

A complainant may also file a complaint directly with the Federal Transit Administration (FTA) by filing a complaint with the Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

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

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI Ciudad de Surprise/Valley Metro

Ciudad de Surprise o Valley Metro (*y sus subcontratistas, si cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). 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 las obligaciones de la Ciudad de Surprise o Valley Metro's programa de derechos civiles contacte Scott Bailey Ciudad de Surprise Title VI Coordinator 623-222-1000, (TTY 623-222-1002); email hr@surpriseaz.gov; o visite nuestra oficina administrativa en 16000 N. Civic Center Drive, Surprise AZ 85374. Para obtener más información, visite <http://www.surpriseaz.gov/index.aspx?NID=2891>.

Cualquier persona que considere que se han violado sus derechos puede presentar una queja dirigida a Valley Metro Customer Service, (602) 253-5000 (TTY: (602) 251-2039, ValleyMetro.org, por correo electrónico a csr@valleymetro.org o puede enviar la queja por correo postal dirigido a Valley Metro Customer Service, 4600 E. Washington Street, Suite 101, Phoenix, AZ 85304.

El puede presentar una queja directamente con Federal Transit Administration (FTA) mediante la presentación de una queja directamente con FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notices are posted in the following locations: City of Surprise Clerk's Office, City of Surprise website, and City of Surprise Park and Ride facility located at 134th Ave and Bell Rd.

The notices are posted online at <http://www.surpriseaz.gov/index.aspx?NID=2891>.

Title VI Complaint Procedures

Any person who believes she or he have 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 Form or by calling Valley Metro's Customer Service. This anti-discrimination protection also extends to the activities and programs of Valley Metro's third party contractors. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). All complaints are logged into Valley Metro's Customer Assistance System (CAS) and will be investigated according to federal standards.

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.

To submit a complaint online, fill out the online complaint form. Valley Metro's Title VI Complaint Form (English and Spanish) is located on the website:

http://www.valleymetro.org/about_valleymetro/civil_rights_policy_statement

To submit a claim by mail, by phone, or in person, please fill out the printable complaint form and mail/take to or call:

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

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

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

Complaints received by Customer Service will be assigned to the appropriate staff member(s) for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, 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.

Note: To request information about Valley Metro's Title VI Policy, please send an e-mail to TitleVICoordinator@valleymetro.org. To request information in alternative formats, please contact Customer Service at csr@valleymetro.org or 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, a possibility 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.

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 an outstanding 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 complaint reopened by Customer Service administrator and sent back if not completed accurately.

INVESTIGATING

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:

1. Who?
2. What?
3. When?
4. Where?
5. How?

Add new issues that surface during investigation. The 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. Send 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”.

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"/> LINK	<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"/> Limited English Proficiency	<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



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



Title VI Investigations, Complaints, and Lawsuits

The City of Phoenix and Valley Metro operate Surprise transit service, therefore, those entities have reported all Surprise complaints in the respective programs for 2012-2015.

*City of Surprise/Valley
Metro
Public Participation
Plan*



City of Surprise/Valley Metro is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, City of Surprise/Valley Metro made the following community outreach efforts:

- 1) Public Community hearing/meeting re: Valley Metro route changes(February 2012)
- 2) Public Press Release re: Dial-a-Ride Improvements/changes (August 2012)
- 3) Four Public Community Hearings re: Proposed Dial-a-Ride changes (September 2012)
- 4) Community-wide Publication and dissemination via USPS of Dial-a-Ride (Fall 2012)
- 5) Northwest Valley Transit Public Community Workshop (January 2014)
- 6) Public Press Release re: Dial-a-Ride Expansion (December 2014)

In the upcoming Year City of Surprise/Valley Metro will make the following community outreach efforts:

The City of Surprise does not anticipate that its transit-related programs and activities will change during the next year. In the event there are changes proposed to the City will utilize Valley Metro's Title VI Public Participation Plan.

Public Meetings:

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



1.0 Introduction

Throughout the year Valley Metro conducts public outreach activities related to capital projects, transit service changes, fare changes, as well as other transit-related events. To ensure adequate inclusion of the public throughout the Phoenix metropolitan community and to comply with the content and considerations of Title VI, this inclusive Public Participation Plan was established. Following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular¹ (Circular), Valley Metro uses this plan to ensure adequate involvement of low-income, minority and limited English proficient (LEP) populations.

Involving the general public in Valley Metro practices and decision-making processes provides helpful information to improve the transit system or 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, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Valley Metro currently practices all of these strategies, in compliance with Federal regulations, so that minority, low-income and LEP populations have meaningful opportunities to engage in planning activities.

2.0 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

¹ US DOT FTA Circular 4702.1B



outlets and printed or electronic materials, Valley Metro disseminates information regarding planning efforts. These efforts include the activities described below.

- Public meetings, hearings and open houses are held regularly at community-familiar locations with public transportation access and at convenient times. 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 utilizes 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 changes to service or routes. Oftentimes, these efforts are at transit stations, community centers, civic centers, or major transfer locations.
- Coordination with community- and faith-based organizations, educational institutions and other organizations occurs regularly. These coordination efforts assist Valley Metro in executing public engagement strategies that reach out to members of the population that may be impacted.
- Valley Metro conducts specially tailored transit presentations to community groups. This includes mobility training for senior citizens and persons with a disability as well as information on how to use the transit system for new residents and refugees. More comprehensive training is also conducted monthly at a regional center for disabled persons.
- 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 as well as door hangers, direct mail, newspaper advertisement, electronic messaging (email through existing data-base), 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 the public. Additionally, Valley Metro sends out press releases on service changes and other programs to Spanish-language media.
- 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 by “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 for consideration when taking action on proposed service changes.

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

3.0 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 nearby 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 effort conducted every two years is the Rider Satisfaction Survey. 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 citizen 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 6 a.m. to 8 p.m. Monday through Friday, 7 a.m. to 7 p.m. Saturdays, and 8 a.m. to 5 p.m. Sundays and designated holidays. Customer Service staff are bilingual. Also available is the website www.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 91 languages with information on transportation services, proposed service changes and other programs.

4.0 Conclusion

Valley Metro conducts public outreach throughout the year to involve the general public with 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. Valley Metro will continue to involve all communities in an effort to be inclusive of all populations throughout the



Metropolitan Phoenix area and also to 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.

Limited English Proficiency Plan

City of Surprise/Valley Metro

Limited English Proficiency Plan



Valley Metro has conducted a thorough LEP four factor analysis and resulting Language Access Plan to be utilized by all Valley Metro member agencies. This Language Access Plan, as set forth below, will be utilized by the City of Surprise to ensure compliance with its obligations to Limited English Proficiency (LEP) person under Title VI.



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 44 local bus routes, 15 key local bus routes, 1 limited stop peak and 2 limited stop all-day routes, 20 Express/RAPID routes, 19 community circulator routes, one rural connector route, and one light rail system for a total of 103 regional routes. Eight regional entities provide 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.

Language Assistance Plan
07/27/2015



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

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 15 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.

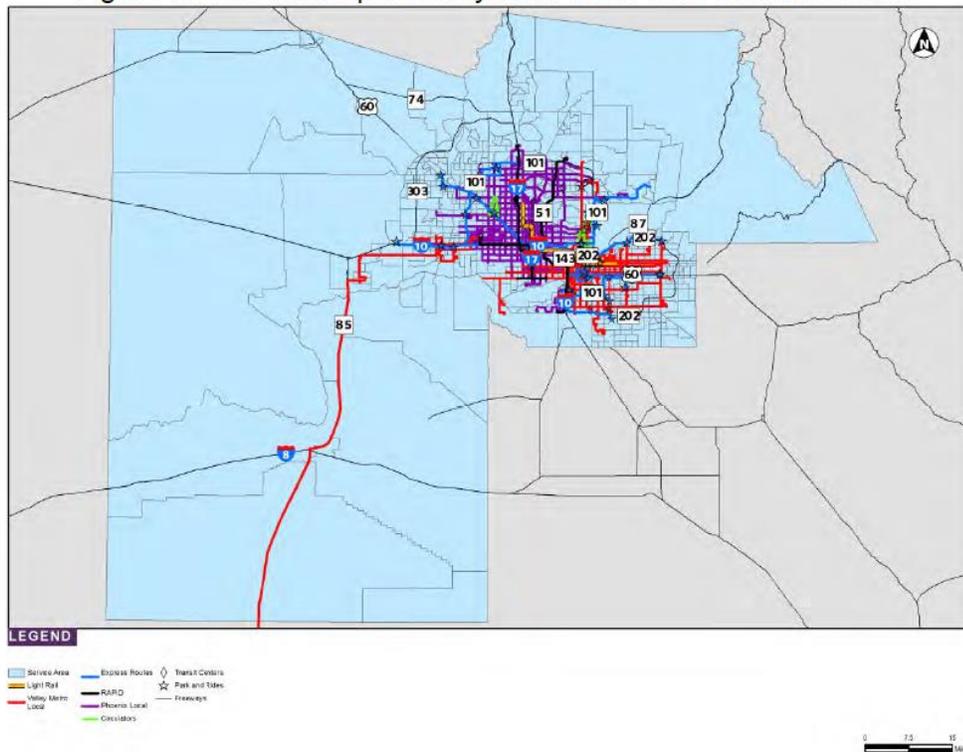
2.2 LEP Population Identification

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 15 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 census tracts within the County. Census tracts encapsulated within the one-quarter mile buffer are also included in the estimates.

Figure 1: 2015 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. Predominately the population self-identified as speaking English less than “Very Well” is of 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 1.7percent 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.

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 4.9percent of the total. Remaining languages comprise 1.1percent of households that are classified as linguistically isolated.



Figure 2 shows a map depicting the concentrations of linguistically isolated households in census tracts within one-quarter 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.

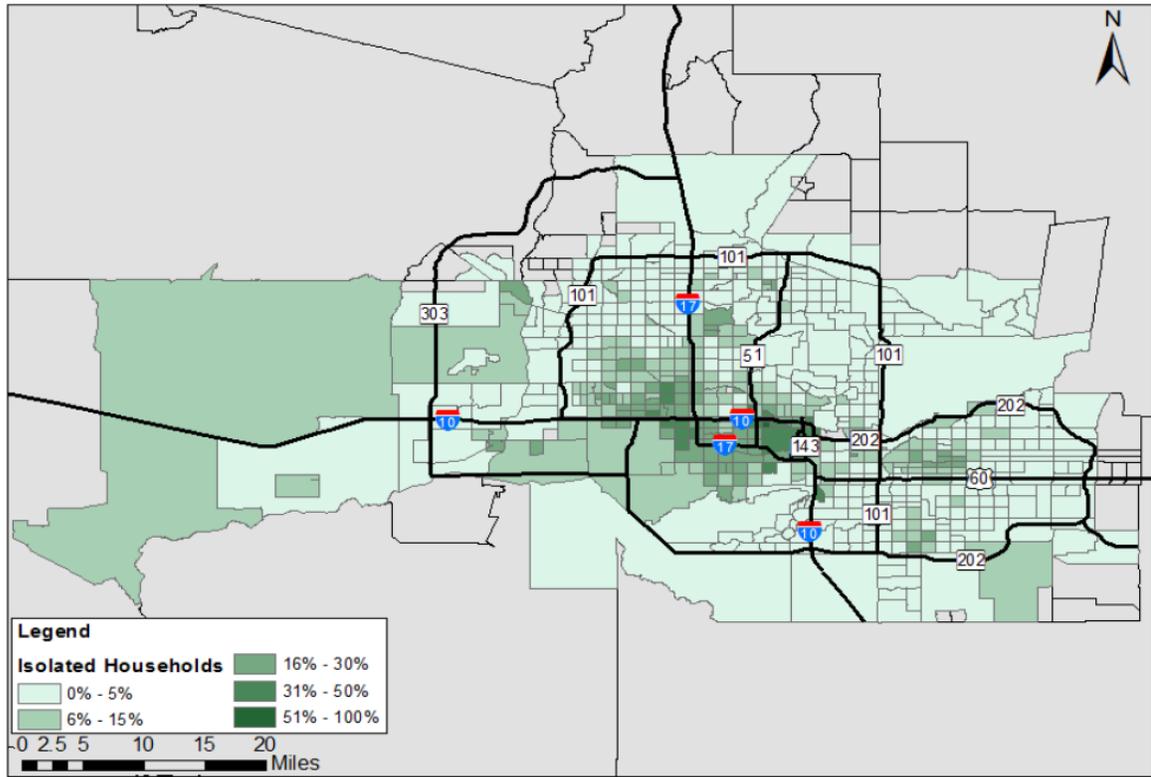
Figure 3 shows the census tracts within the ½ mile buffer of transit routes. Census tracts encapsulated within this area are included in the estimates though they may not be within a ½ mile of a fixed route.

Within this area, the most recent census data from the ACS 2013 data estimate 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; see Table 4.

Table 4: ACS 2013 Data by Location

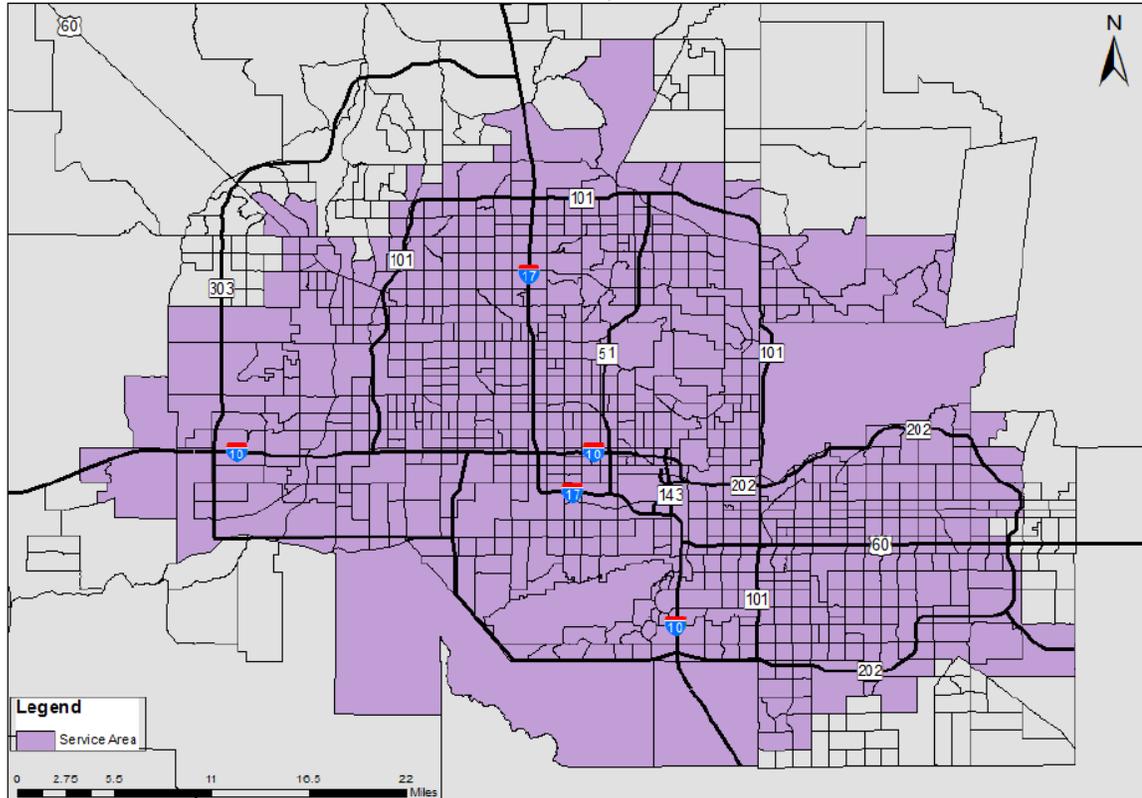
County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
Maricopa County	3,610,510	2,660,946	589,679	359,884	10.0%
Census Tracts 1/2-mile fixed routes	3,051,428	2,171,136	540,216	340,076	11.1%

Figure 2: Census tracts with Linguistically Isolated Households



Source: Census 2000

Figure 3: 2015 Census Tracts within One-Quarter Mile of Fixed Route Service (ACS 2013)



Source: ACS 2013

The ACS data show 19 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 5 shows the populations that meet either of these thresholds using ACS 2013 population by language and ability, sorted by percentage of LEP population.



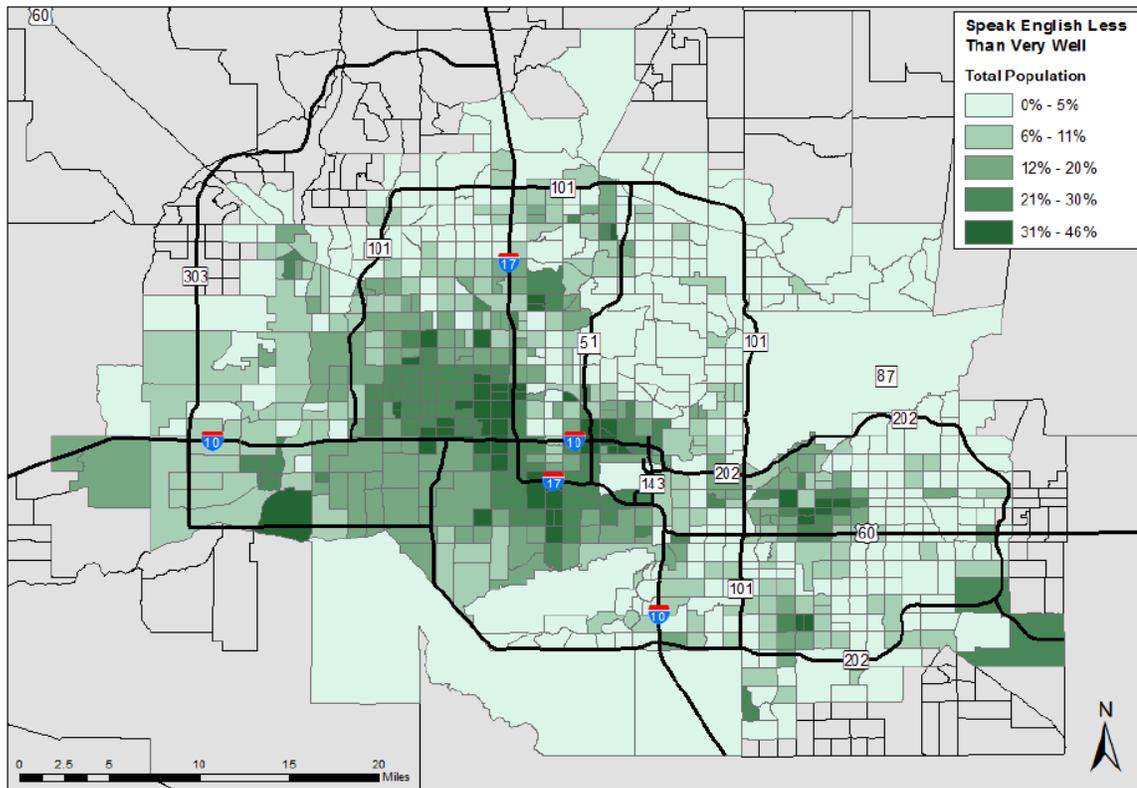
Table 5: ACS 2013 Data by Language within One-Quarter Mile of Fixed Route Service

Language	Speak English		Total Population	Percentage of Language LEP of Total LEP Population
	Less Than Very Well	Very Well		
All Languages	340,076	-	-	100%
Spanish	275,370	416,599	691,969	81.05%
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%

Within one-half mile of fixed route service, the majority (81%) of the LEP population is the Spanish speaking population; this is the only language group to exceed 5percent of the LEP population. The Spanish LEP population consists of 275,370 persons within the service area. Chinese and Vietnamese followed with 2.65percent and 2.76percent respectively, both were approximately 9,000 persons. There are 4,908 Arabic speaking LEP persons or 1.44percent 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.

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.

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 March and early April 2015, 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 (via Customer Assistance System, letter, phone, or email)
- Central Station Transit Center
- Ed Pastor Transit Center

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

- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center

In total 26 respondents provided information about their experiences. Approximately 70% of those surveyed were Customer Service Representatives employed at the Mobility and Customer Service Center.

When asked if representatives have had any requests for materials in another language, 31% 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, only three locations had received requests: Central Station Transit Center (50% of requests), the Mobility and Customer Service Center (38% of requests), and Ed Pastor Transit Center (13% of requests).

Languages requested were predominately Spanish (55%) followed by French (18%). See Figure 6 for a full breakdown of the languages requested, including Japanese, Swahili, and Sa'ban.

Due to a low number of requests that had been received for materials in other languages the questions regarding frequency of requests shown in Table 6 were quite evenly spread.

Figure 5: Requests for Information or Materials in Another Language

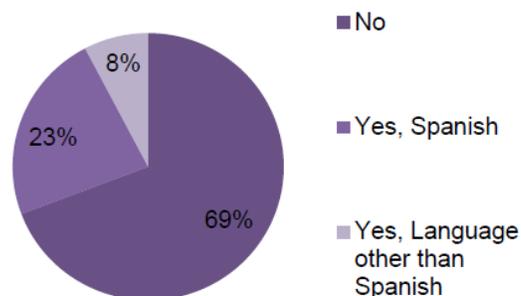


Figure 6: Chart of Requested Languages

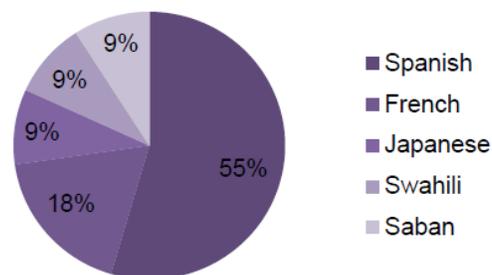


Table 6: Frequency of Requests Received

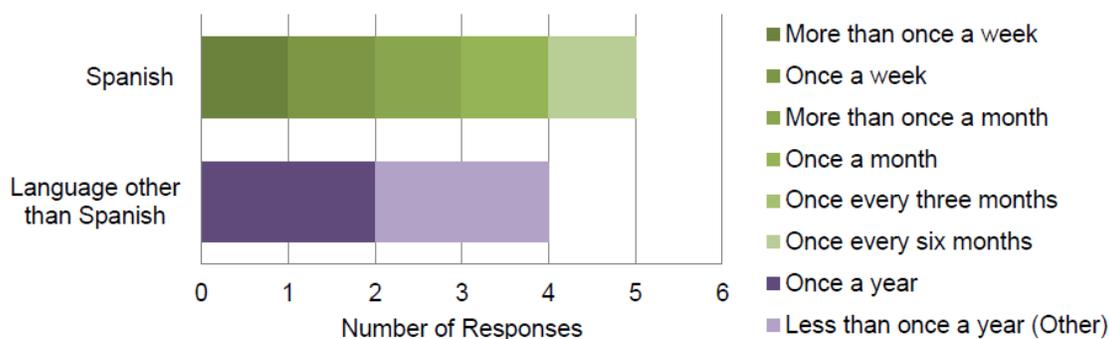
How often do you receive requests?	Number	Percentage
Once a week	1	11%
More than once a week	1	11%
Once a month	1	11%
More than once a month	1	11%
Once every six months	1	11%
Once a year	2	22%
Other	2	22%
TOTAL	9 ²	100%

Recognizing that 60% of language requests were for the Spanish language, the two write-in responses for “Other” provide some telling qualitative information. Those responses were:

- “French-every six months, Swahili only once ever”
- “Once in 19 years” -for Japanese

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-2014³ to establish the Interactive Voice Response (IVR) feature. With this expansion, the new

² One respondent provided two responses – the second being a write in under the “Other” response.



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, 12 bilingual customer service representatives are employed by Valley Metro. The new phone system prioritizes selection of Spanish calls received. Acknowledging that this is a truncated data set, Table 7 below shows the distribution of calls by option selected, followed by the sum of calls by language.

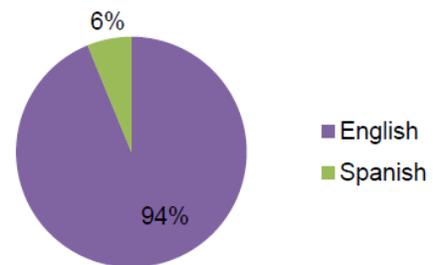
Table 7: Customer Service Call Log

	Total Calls	% of Total Calls
ADA-English	13,840	1.26%
ADA-Spanish	139	0.01%
CR-English	75,874	6.90%
CR-Spanish	371	0.03%
Light Rail-English	184	0.02%
Light Rail-Spanish	5	0.00%
Lost Found-English	5,073	0.46%
Lost Found-Spanish	22	0.00%
TI-English	936,408	85.16%
TI-Spanish	67,630	6.15%
English	1,031,379	93.8%
Spanish	68,167	6.2%
Total Calls	1,099,546	100.00%

Figure 8 shows a pie chart of the calls by language. Approximately 94% of calls were for English and 6% of calls were for Spanish. At the time of this report, 37 customer service representatives were currently on staff; of these, twelve are bilingual (32%).

When evaluating the customer service call logs, the bulk of calls received are through the

Figure 8: Customer Service Calls by Language



³ Data available July 2014 through April 2015



English phone lines with a small portion (6%) 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 visit schools, present to new residents and refugee groups, and provide mobility training for 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 the transit system. For more-comprehensive training, monthly sessions are held at the Disability Empowerment Center and Glendale Adult Center.

Discussions with the program staff revealed some helpful anecdotal information. Typically, persons encountered spoke English fluently or well. The second most common language encountered was Spanish. Fifty percent of this team speaks Spanish and regularly provide information in Spanish.

Occasionally, presentations are made to various refugee groups. Due to the varied backgrounds of the participants, the hosting organizations generally provide necessary interpreters. Anecdotally, predominately Arabic and less often Burmese are the languages typically encountered during these presentations. However, it was noted that languages from around the world have been encountered through these group presentations.

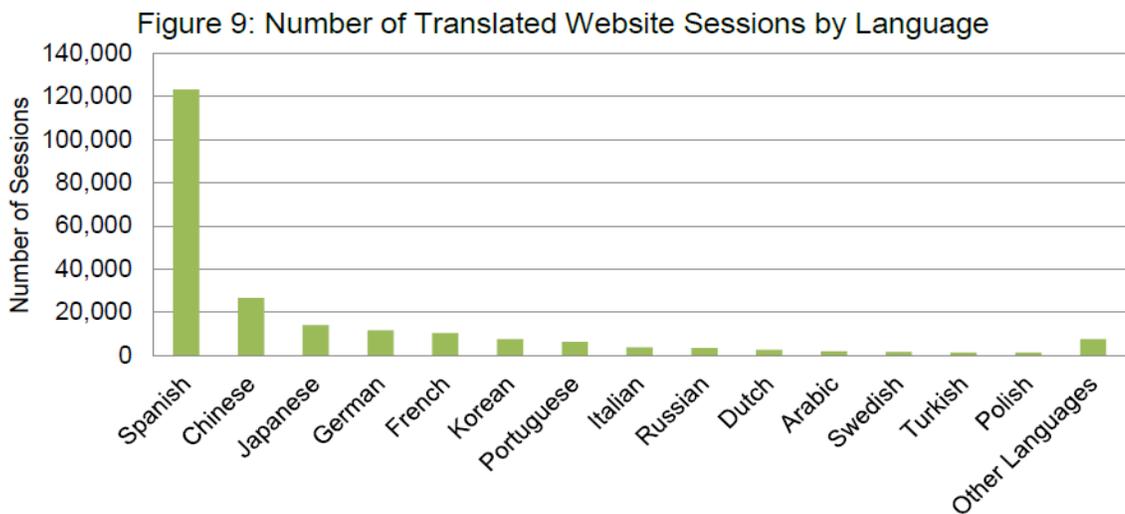
Website Translation

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. The website is equipped with the Google Translate feature, which allows translation into 90 languages. Users have translated the Valley Metro website into 70 different languages using this feature. Approximately 99% of sessions were utilizing the default English setting. The remaining 1% was comprised of 69 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 Language⁴

Language	Number of Sessions	Percent of Total Sessions
Total	21,614,462 ⁵	100%
English	21,392,285	98.91%
Other Languages	222,177	1.03%
Language	Number of Sessions	Percent of Total Sessions
Spanish	123,377	0.57%
Chinese	26,684	0.12%
Japanese	13,950	0.06%
German	11,502	0.05%
French	10,316	0.05%
Korean	7,496	0.03%
Portuguese	6,225	0.03%
Italian	3,638	0.02%
Russian	3,303	0.02%
Dutch	2,576	0.01%
Arabic	1,822	0.01%
Swedish	1,483	0.01%
Turkish	1,221	0.01%
Polish	1,127	0.01%
Other Languages	7,457	0.03%

Once again, Spanish was overwhelmingly the most utilized language with the website translation service comprising 0.57% of sessions, followed by Chinese (0.12%), Japanese (0.06%), German (0.05%), and French (0.05%). See Figure 9 below for a chart of the number of translated sessions by language.



⁴ Valley Metro. (2015). Language [Data file]. Available from <http://www.google.com/analytics/ce/mwvs/>

⁵ There were 13,829 entries excluded from the analysis that did not have a valid ISO language code associated with the website visit; thus, entries were deemed invalid.



The website was translated to an additional 55 languages that each comprises less than 0.01% of the sessions; collectively these viewings attribute to 0.03% of all sessions. These languages include:

- Acoli
- Afrikaans
- Albanian
- Armenian
- Aymara
- Azerbaijani
- Bengali
- Bosnian
- Breton
- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Esperanto
- Estonian
- Filipino
- Finnish
- Galician
- Georgian
- Greek
- Gujarati
- Hebrew
- Hindi
- Hungarian
- Icelandic
- Indonesian
- Irish
- Javanese
- Kannada
- Kanuri
- Latvian
- Lithuanian
- Macedonian
- Malay
- Malay
- Malayalam
- Marathi
- Navajo
- Norwegian
- Persian
- Pushto
- Romanian
- Serbian
- Slovak
- Slovenian
- Tagalog
- Telugu
- Thai
- Tonga
- Turkmen
- Ukrainian
- Vietnamese
- Walloon
- Welsh

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 (0.57%).

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 31% of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 55% of requests were for Spanish. The Customer Service Call Log, though limited, showed that a mere 6% of customers utilized one of the six Spanish options. Information from the Transit Education team qualitatively identified Spanish as the main language group, while there were also occasional encounters with Arabic-speaking populations. Finally, translation data from the Valley Metro website indicated 1.03% of sessions were translated; approximately half of which were translated to Spanish. The website was translated to 70 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

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-
- 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 VMS⁶ Announcements on vehicles (bus and rail), operator call boxes, emergency call boxes, and Safe Place notices.

⁶ Variable message signs
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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. The organizations interviewed range from cultural adult centers to refugee services organizations.

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.

Community Organizations Interviews

To garner insight on the use and role of Valley Metro services to the LEP populations within the Phoenix Metropolitan region, six community organizations were interviewed:

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

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.

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Participating agencies 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.

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.

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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

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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.

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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 VMS⁷ 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 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.

⁷ LINK stations, light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities



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 serv 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 90 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

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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.

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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.

Non-elected Committees Membership Table

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

The City of Surprise does not currently have any transit-related, non-elected planning boards, advisory councils, or committees. Therefore, this section is currently not applicable and the City does not have a process by which to encourage the participation of minorities on same. However, if and when the City of Surprise creates any such transit-related, non-elected planning boards, advisory councils, or committees, the City will adopt and implement a process which is fully compliant with Title VI and is designed to encourage and facilitate the participation of minorities in compliance with Title VI and any other applicable federal and state law, regulations, and rules.

Monitoring for Subrecipient Title VI Compliance

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

Title VI Equity Analysis

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

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

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

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

Board Approval for the Title VI Program

RESOLUTION # 2015-98

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE CITY OF SURPRISE, ARIZONA APPROVING AND ADOPTING THE CITY OF SURPRISE TITLE VI IMPLEMENTATION PLAN.

WHEREAS, 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, which among other things prohibits discrimination based on race, color, and national origin;

WHEREAS, City of Surprise is a sub-recipient of FTA funding for public transportation programs (Dial-a-Ride), distributed through the City of Phoenix Public Transit Department as the primary recipient of said funds;

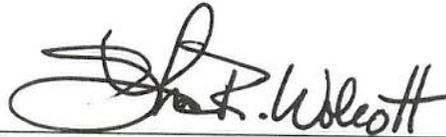
WHEREAS, all sub-recipients of FTA funds must develop, update, and submit every three years a Title VI Plan to the primary recipient to assist in the primary recipient's respective Title VI compliance requirements; and

WHEREAS, the City has updated its Title VI plan to comply with new requirements which were adopted by the FTA in October of 2012.

NOW, THEREFORE, BE IT RESOLVED by the Mayor and Council of the City of Surprise, Arizona, as follows.

Section 1. The Title VI Implementation Plan, hereby attached as Exhibit A and incorporated by reference, is approved and adopted as the City of Surprise Title VI Plan.

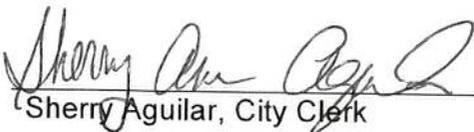
APPROVED AND ADOPTED this 20 day of October, 2015.



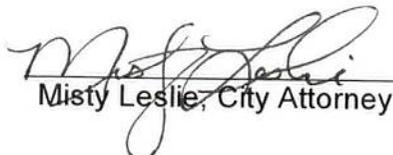
Sharon R. Wolcott, Mayor

Attest:

Approved as to form:



Sherry Aguilar, City Clerk



Misty Leslie, City Attorney