
Title VI Plan

2019 - 2022



City of Peoria Transit

Effective February 2019

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Title VI Policy Statement

The City of Peoria Transit policy assures full compliance with Title VI of the Civil Rights act of 1964, and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any City of Peoria Transit sponsored program or activity. There is no distinction between the sources of funding.

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

When City of Peoria Transit distributes Federal-aid funds to another entity/person, City of Peoria Transit will ensure all subrecipients fully comply with City of Peoria Transit Title VI Nondiscrimination Program requirements. The Peoria City Manager has designated the Transit Manager to oversee and implement FTA Title VI requirements.

Jeff Tyne, Peoria City Manager

Title VI Notice to the Public

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

The City of Peoria Transit operates its programs and services without regard to race, color, 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 Peoria's transit service contractor, Valley Metro Customer Service.

For more information on the City of Peoria Transit's civil rights program, and the procedures to file a complaint, contact 602-253-5000, (TTY (602)-261-8208); email csr@valleymetro.org; or visit the administration office at 4600 E. Washington Street, Suite 101, Phoenix, AZ 85034.

A complainant may file a complaint directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **City of Phoenix Public Transit Department:** ATTN: Title VI Coordinator, 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 **FTA:** ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590.

If information is needed in another language, contact Valley Metro at (602) 253-5000. Para información en Español llame: Valley Metro Customer Service.

The above notice is posted in the following location: City of Peoria Transit Office, 8850 N. 79th Avenue, Peoria, AZ 85345.

This notice is posted online at www.peoriaaz.gov

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI **City of Peoria Transit**

City of Peoria Transit (*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 Peoria Transit's programa de derechos civiles, y los procedimientos para presentar una queja, (623)773-7449, (TTY (602) 602-261-8208); correo electrónico csr@valleymetro.org o visite nuestra oficina administrativa en 4600 E. Washington Street Suite 101. Phoenix, AZ 85304. Para obtener más información, visite www.peoriaaz.gov

El puede presentar una queja directamente con City of Phoenix Public Transit Department o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: City of Phoenix Public Transit Department: ATTN Title VI Coordinator 302 N. 1st Ave., Suite 900, Phoenix AZ 85003 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: Transit Vehicles, Transit offices and employee lunch rooms.

This notice is posted online at www.peoriaaz.gov

Title VI Complaint Procedures



TITLE VI COMPLAINT PROCEDURE

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any Valley Metro service, program or activity, and believes the discrimination is based upon race, color or national origin may file a formal complaint with Valley Metro Customer Service. 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).

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).

To submit a complaint online, fill out the online complaint form.

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

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.

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. 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:

(http://www.valleymetro.org/about_valleymetro/civil_rights_policy_statement). 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, 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.

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 city’s 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"/> 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? 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:

Title VI Investigations, Complaints, and Lawsuits

The City of Phoenix and Valley Metro operate the City of Peoria's fixed route service on behalf of the city. Therefore, the City of Phoenix and Valley Metro have reported all City of Peoria Transit Title VI complaints in their respective Title VI programs. The City of Peoria Transit Department has had no Title VI lawsuits from 2015-2018.

Investigations:

None received.

Lawsuits:

None received

Complaints: Three complaints not valid, no action. Routes operated by Valley Metro

- #300671, 7/2/16, Route 170, Operator, Discrimination-Video was reviewed and no conclusive evidence to validate customer's complaint. No action could be taken.
- #315607, 12/13/16 Route 106, Operator, Discrimination-Operator to be monitored.
- #321286 2/17/17, Route 138, Operator, Attitude- Operator to be monitored. Route scheduled for mystery rider check.



*City of Peoria Transit
Public Participation
Plan*



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

City of Peoria Transit has adopted the Valley Metro Public Participation Plan, which can be found at the end of this program listed as “Attachment A.” City of Peoria Transit has not conducted any transit-related public outreach between the years of 2015 and 2018. Valley Metro conducts all outreach for transit service changes on behalf of the City of Peoria.

At any time an item needs addressing public meetings will be conducted at a Peoria public venue(s) space on an as needed basis

Public Meetings:

- (1) Public meetings are scheduled to maximize 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.

Limited English Proficiency Plan

City of Peoria Transit

Limited English Proficiency Plan



City of Peoria Transit has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of Peoria Transit services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City of Peoria Transit's extent of obligation to provide LEP services, the City of Peoria Transit undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the City of Peoria Transit service area who may be served or likely to encounter by City of Peoria Transit program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an City of Peoria Transit services;
- 3) The nature and importance of the program, activities or services provided by the City of Peoria Transit to the LEP population; and
- 4) The resources available to City of Peoria Transit and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested. LEP brochures will be available on Peoria transit vehicles.

Safe Harbor Provision

City of Peoria Transit complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

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

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

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

The City of Peoria has adopted the Valley Metro Limited English Proficiency Plan, which can be found at the end of this program listed as “Attachment B.”

Non-elected Committees Membership Table

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

The City of Peoria Transit Department does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

X City of Peoria Transit does NOT monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

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

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

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

A. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Additionally, the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where an agency is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating an agency in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The City of Peoria Transit has not constructed a facility that would require a Title VI equity analysis from 2015-2018.

Board Approval for the Title VI Plan

The Title VI Plan was presented to the Peoria City Council for approval February 19, 2019.

Valley Metro Public Participation Plan - Attachment A

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 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 limited English proficient (LEP) populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular¹ (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.

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

- 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 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.

- Public meetings, hearings and open houses are held regularly at community-familiar locations with public transportation access and at convenient times, in collaboration with city partners. These meetings provide an opportunity to meet with citizens and receive their comments and questions on proposed service changes and other programs. For each program, Valley Metro varies its meeting format 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 also executed 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 people with disabilities, as well as information on how to use the transit system for new residents and refugees. More comprehensive travel training is also 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 as well as 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. Valley Metro will continue to involve all communities in an effort to be inclusive of all populations throughout the metro Phoenix area and to also comply with Federal regulations. Valley Metro will continue to monitor and update this Inclusive Public Participation Plan as part of the Title VI Program which is updated triennially.

*Valley Metro Language
Assistance Plan -
Attachment B*



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.

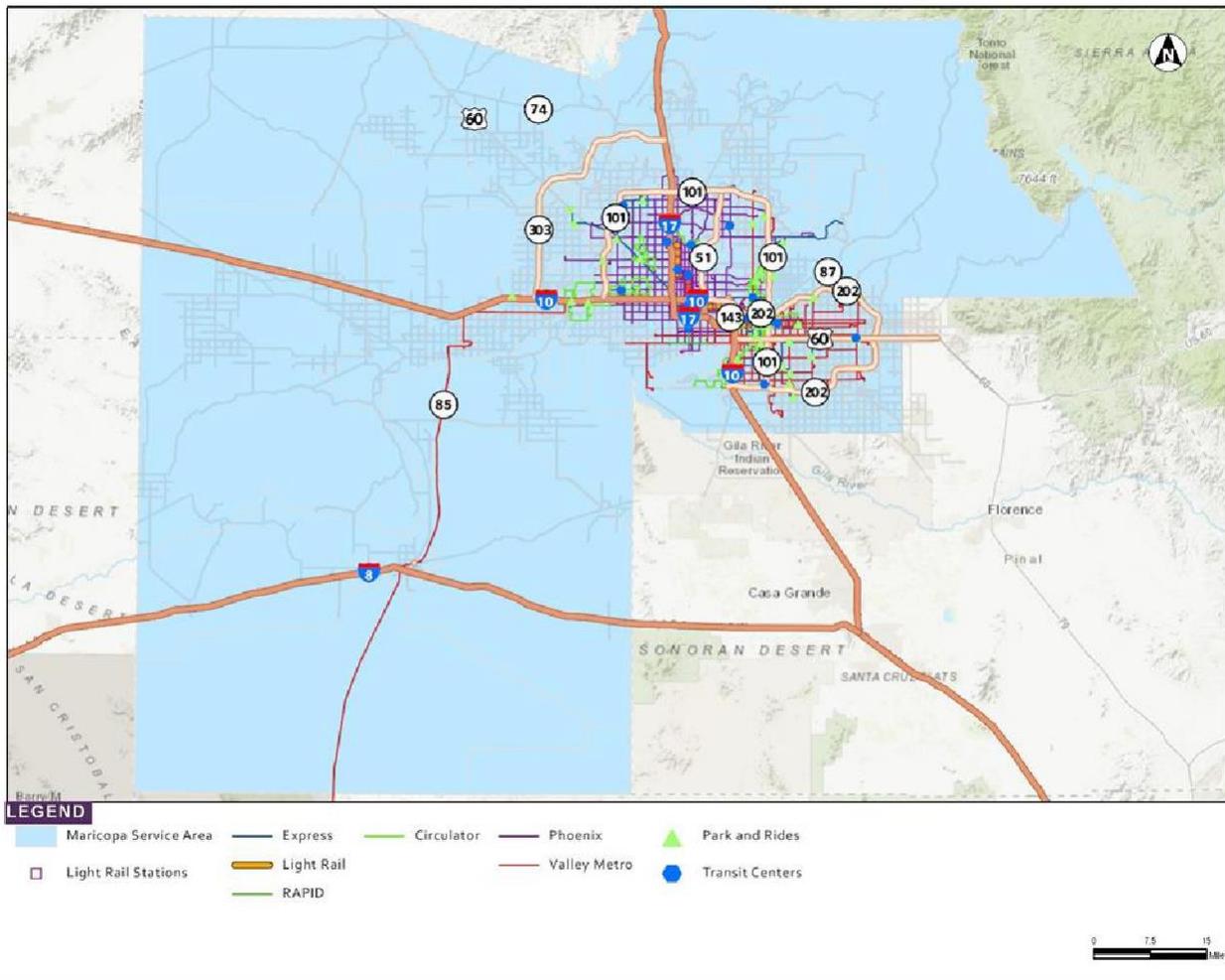
2.2 LEP Population Identification

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%

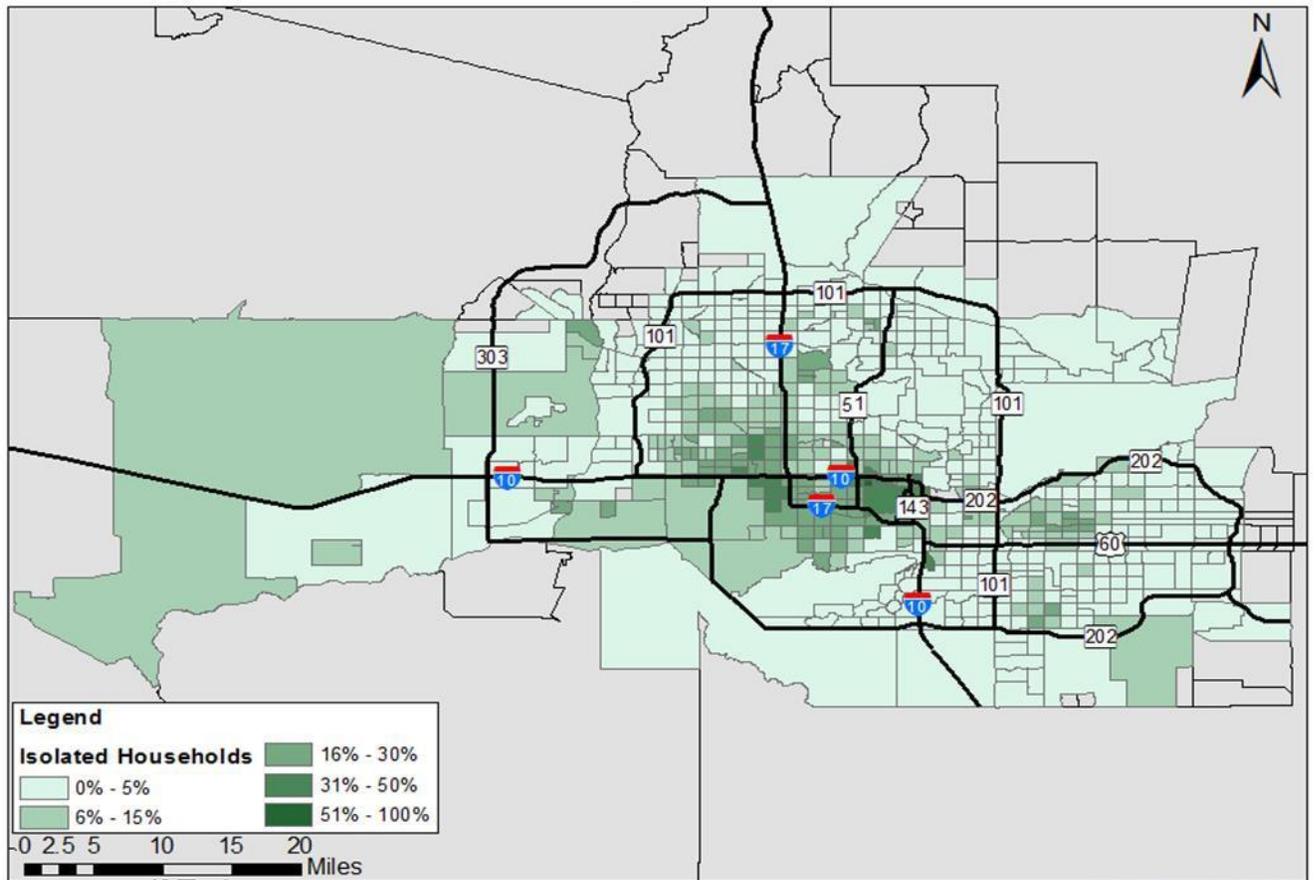
Within the fixed route transit area 5.9 percent of households are considered linguistically isolated. Again, these are predominately Spanish households making up 4.9 percent of the total. Remaining languages comprise 1.1 percent of households that are classified as linguistically isolated.

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

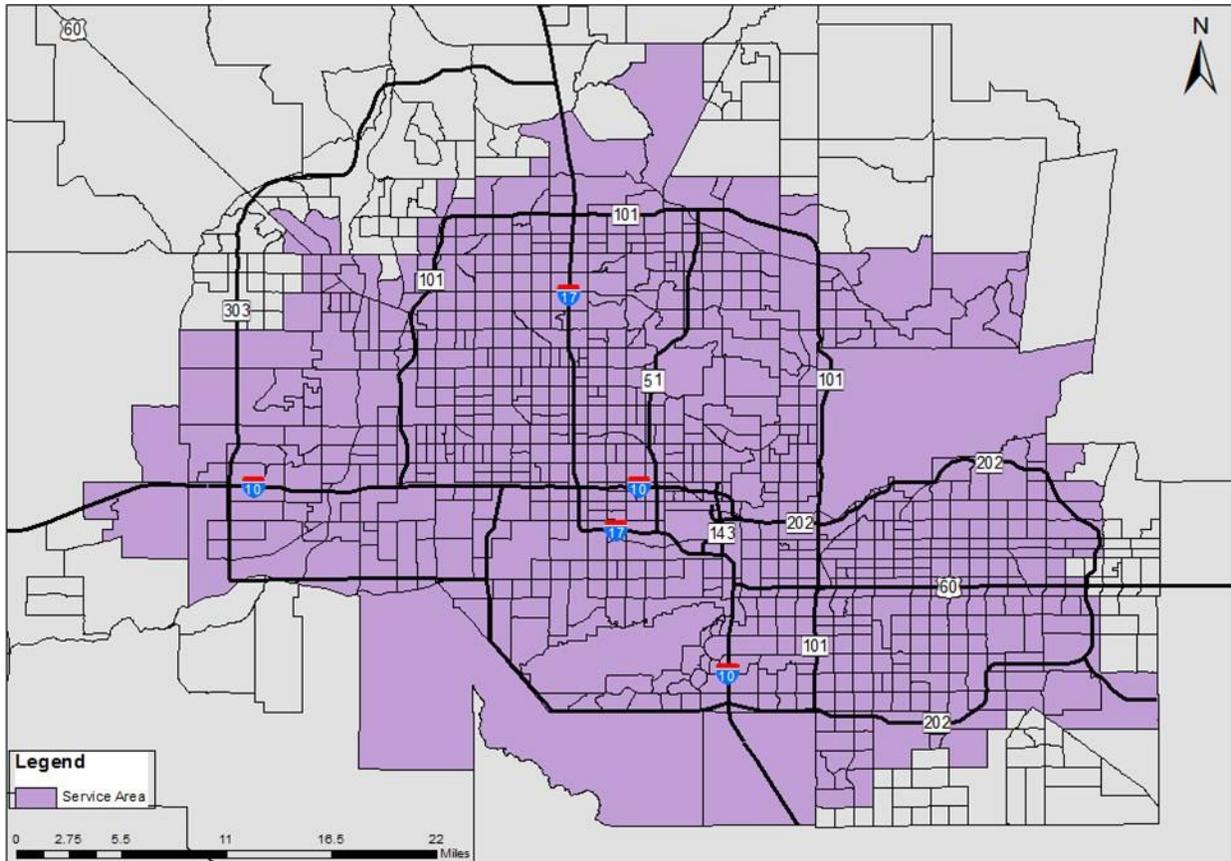


Source: Census 2000

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.

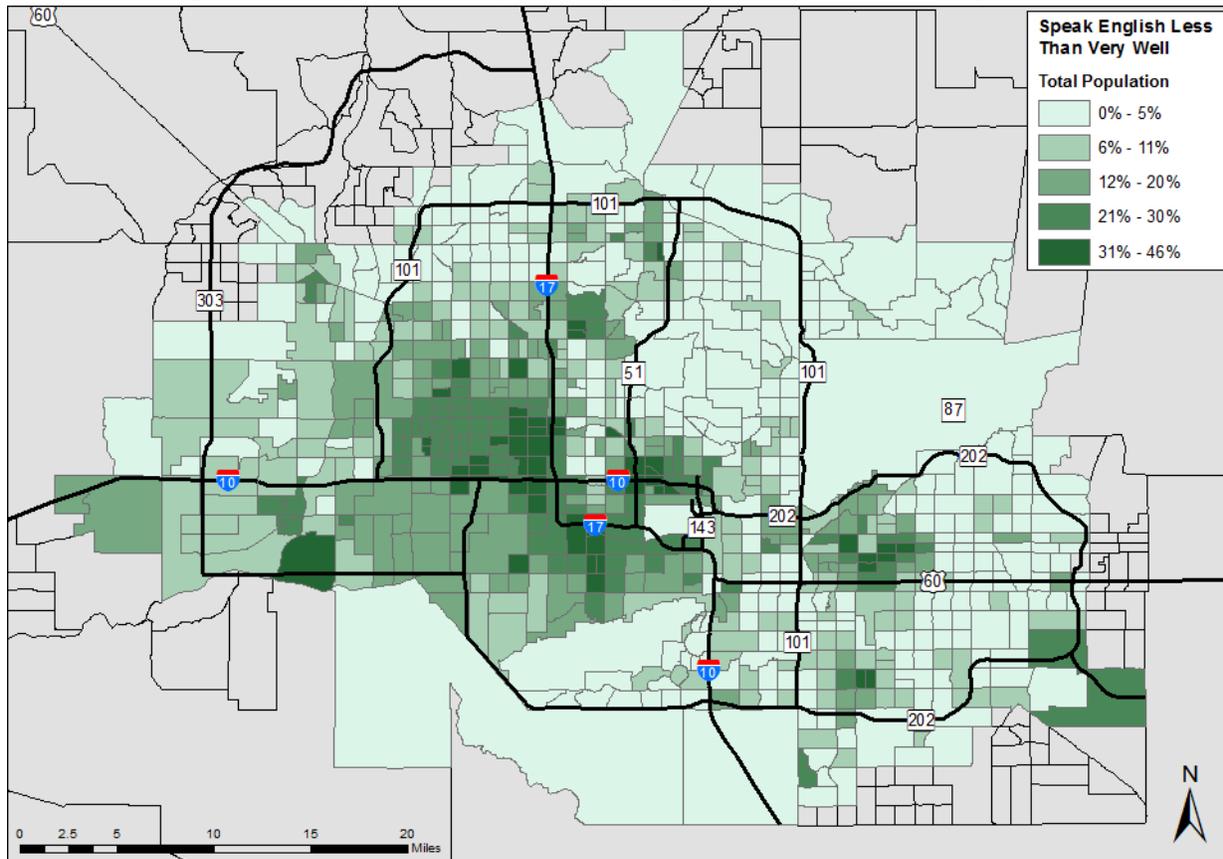
The ACS 2016 LEP populations within the service area are very similar to the 2013 ACS LEP populations.

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

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.

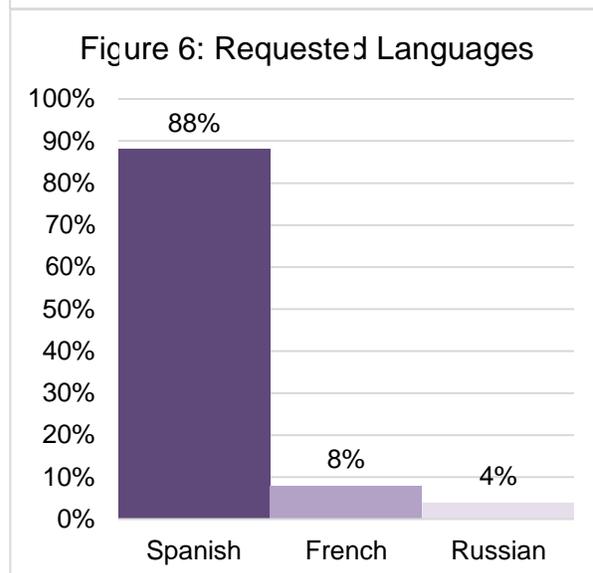
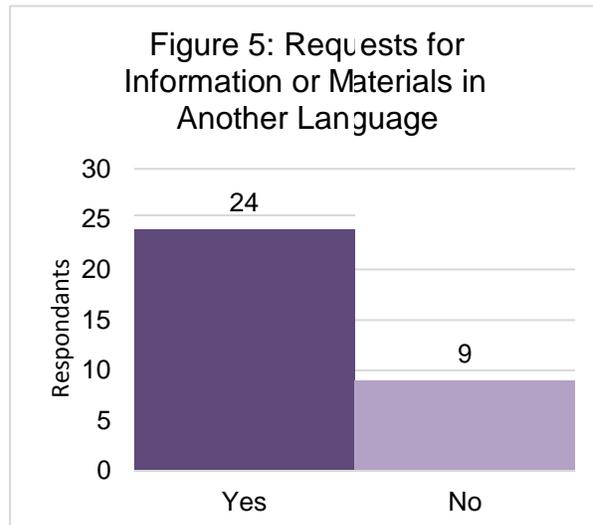
- Sunnyslope Transit Center
- Tempe Transportation Center

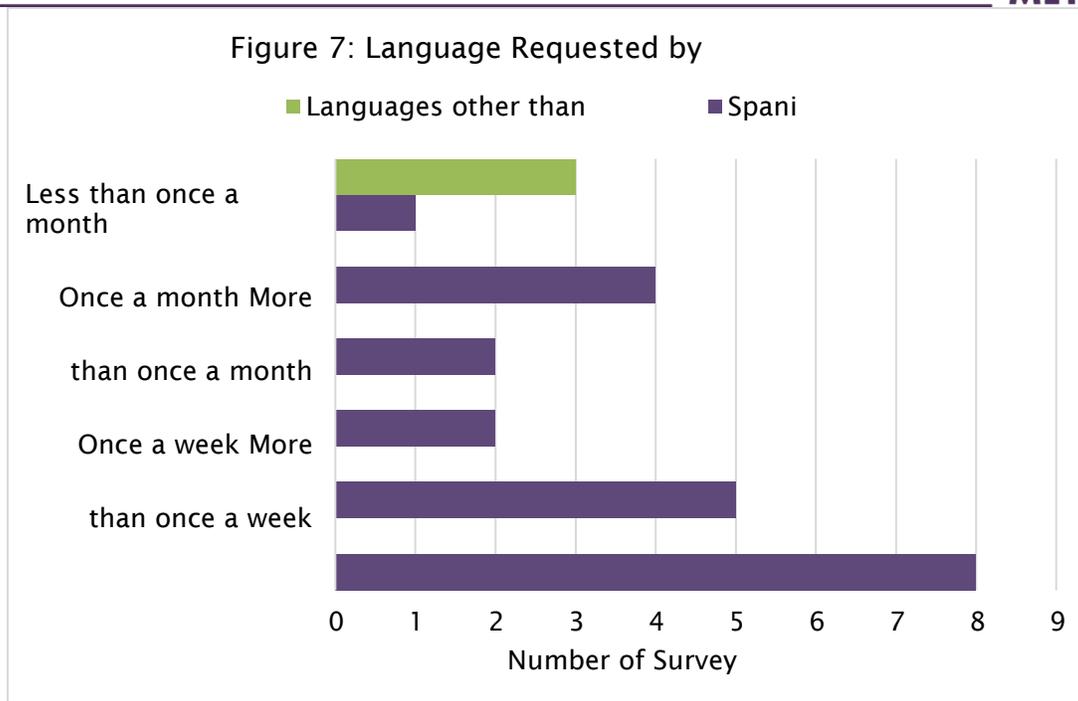
In total 33 respondents provided information about their experiences. Approximately 85% of those surveyed were employed at the Mobility and Customer Service Center.

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.





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

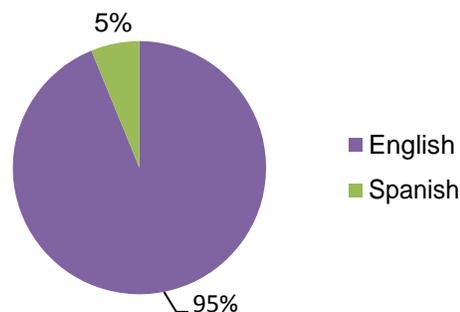
shows the distribution of calls by option selected, followed by the sum of calls by language for calendar year 2017.

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

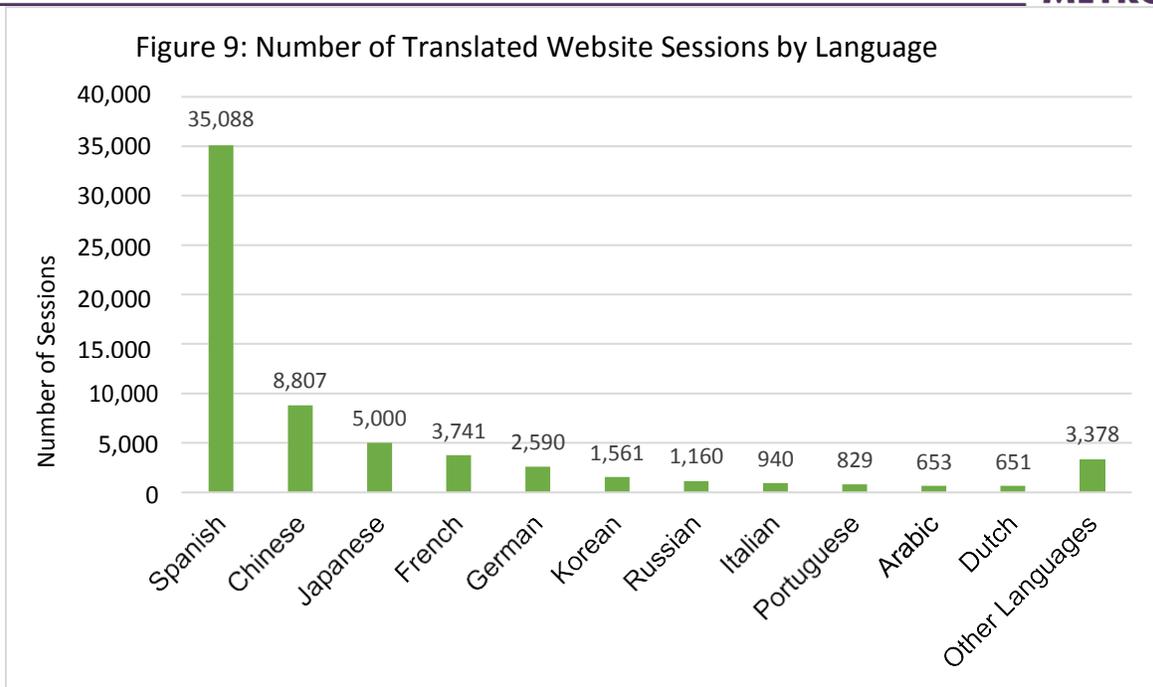
Apart from accessing information via transit employees whether by phone, email, in person or another method, many customers utilize the www.valleymetro.org website for information. During this time the website was equipped with the Google Translate feature, which allows translation into 90 languages. 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/>



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



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.

Language Assistance

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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	Percentage 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	1,623	-
Bengali Speak English Very Well	1,022	-
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	Percentage 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%



APPENDIX B – TRANSIT EMPLOYEE INSTRUMENT

Language Assistance Program Survey 2018

***-denotes required question**

*Name:

*Email Address:

*1. Location

- Customer Service Representatives (electronic, phone, email)
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center

*2. Have you had any requests for information or materials in other languages?

- Yes
- No

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

3. What language(s) have been requested?

4. How often do you receive requests?

- More than once a week
- Once a week
- More than once a month
- Once a month
- Once every three months
- Once every six months
- Once a year
- Other:



APPENDIX C – WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percent of Total Sessions
Total	8,357,032 ⁵	100%
English	8,289,256	99.23%
Other Languages	64,398	0.77%
Language	Number of Sessions	Percent of Non-English Sessions
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%
Czech	349	0.00%
Polish	319	0.00%
Swedish	269	0.00%
Vietnamese	260	0.00%
Turkish	242	0.00%
n/a	218	0.00%
Danish	212	0.00%
Norwegian	203	0.00%
Finnish	158	0.00%
Greek	157	0.00%
Tagalog	142	0.00%
Thai	124	0.00%
Hebrew	122	0.00%
Hungarian	117	0.00%
Indonesian	101	0.00%
Slovak	78	0.00%
Romanian	71	0.00%
Croatian	64	0.00%
Tonga	41	0.00%
Farsi	38	0.00%
Serbian	28	0.00%
Catalan	24	0.00%
Ukrainian	16	0.00%
Latin	15	0.00%
Bulgarian	10	0.00%

⁵ There were 3,378 entries included that did not have a valid ISO language code associated with the website visit; thus the sum of languages will fall short.

