
Title VI
Implementation Plan

**HORIZON HEALTH
AND WELLNESS**

March 13, 2019 – March 13, 2022

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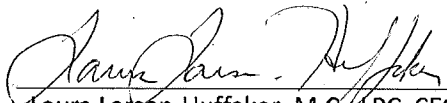
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Title VI Policy Statement

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

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

When Horizon Health and Wellness distributes Federal-aid funds to another entity/person, Horizon Health and Wellness will ensure all subrecipients fully comply with Horizon Health and Wellness Title VI Nondiscrimination Program requirements. The CEO has delegated the authority to the Risk Management Director to act as Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Laura Larson-Huffaker, M.C., LPC, CEO

3-13-19
Date

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI **HORIZON HEALTH AND WELLNESS**

Horizon Health and Wellness 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 Horizon Health and Wellness.

For more information on Horizon Health and Wellness' civil rights program, and the procedures to file a complaint, contact the Agency's Title VI Program Coordinator at 520-836-1688, (TTY 1-800-367-8939); email marsha.ashcroft@hhwaz.org; or visit our administrative office at 210 E. Cottonwood Lane, Casa Grande, AZ 85122. For more information, visit www.hhwaz.org.

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

If information is needed in another language, contact 520-836-1688. Para información en Español llame: 520-836-1688

The above notice is posted in the following locations:

160 W. University Dr., Mesa, AZ 85201; 625 N. Plaza Drive, Apache Junction, AZ 85120; 477 E. Broadway Rd., Apache Junction, AZ 85120; 150 N. Ocotillo, Bldg. #2, Apache Junction, AZ 85120; 22713 S. Ellsworth Road, Bldg. A, Queen Creek, AZ 85142 and all transit vehicles.

This notice is posted online at www.hhwaz.org.

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI HORIZON HEALTH AND WELLNESS

Horizon Health and Wellness (*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 Horizon Health and Wellness' programa de derechos civiles, y los procedimientos para presentar una queja, contacte Title VI Program Coordinator, 520-836-1688, (TTY 1-800-367-8939); o visite nuestra oficina administrativa en 210 E. Cottonwood Lane, Casa Grande, AZ 85122. Para obtener más información, visite www.hhwaz.org.

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

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160 W. University Dr., Mesa, AZ 85201; 625 N. Plaza Drive, Apache Junction, AZ 85120; 477 E. Broadway Rd., Apache Junction, AZ 85120; 150 N. Ocotillo, Bldg. #2, Apache Junction, AZ 85120; 22713 S. Ellsworth Road, Bldg. A, Queen Creek, AZ 85142 and all transit vehicles.

This notice is posted online at www.hhwaz.org.

Title VI Complaint Procedures

HORIZON HEALTH AND WELLNESS

Complaint Procedures

Title VI Complaint Procedures

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

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color or national origin may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted Horizon Health and Wellness will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by Horizon Health and Wellness or submitted to the State or Federal authority for guidance.
- (7) Horizon Health and Wellness will notify the City of Phoenix Civil Rights office of ALL Title VI complaints within 72 hours via telephone at **City of Phoenix: 602-534-9161**; email at christina.hernandez@phoenix.gov.

- (8) Horizon Health and Wellness has 60 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with Horizon Health and Wellness decision may file a complaint with the City of Phoenix, or the Federal Transit Administration (FTA) offices of Civil Rights: **City of Phoenix**: ATTN Title VI/ADA Program Coordinator, 302 N. 1st Ave., Suite 900, Phoenix, AZ, 85007; **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590.
- (11) A copy of these procedures can be found online at: www.hhwaz.org

Title VI Complaint Form

Title VI Complaint forms, in English and Spanish are attached to this Plan.

Title VI Investigations, Complaints and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

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

X- Horizon Health and Wellness has not had any Title VI complaints, investigations, or lawsuits from 2015 through 2018.

HORIZON HEALTH AND WELLNESS

Public Participation Plan

Horizon Health and Wellness 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, Horizon Health and Wellness made the following community outreach efforts:

- 1) Public Meetings:
 - a. Horizon Health and Wellness conducts Peer and Family Advisory Council meetings on a monthly basis. These meetings involve attendance by stakeholders and the general public to discuss issues and concerns related to services provided by the Agency, including transportation.
 - b. Horizon Health and Wellness conducts Board Meetings on a monthly basis. These meetings involve attendance by members of the Board and the general public for planning and decision-making purposes.
- 2) Horizon Health and Wellness provides brochures to the general public that describe services available to the public, including transportation.
- 3) Horizon Health and Wellness lists services on its website and utilizes social media via the agency Facebook page.

In the upcoming year Horizon Health and Wellness will make the following community outreach efforts:

- 1) Public Meetings:
 - a. Horizon Health and Wellness will conduct Peer and Family Advisory Council meetings on a monthly basis. These meetings will involve attendance by stakeholders and the general public to discuss issues and concerns related to services provided by the Agency, including transportation.
 - b. Horizon Health and Wellness will conduct Board Meetings on a monthly basis. These meetings will involve attendance by members of the Board and the general public for planning and decision-making purposes.
- 2) Public meetings are held in locations accessible to people with disabilities.
- 3) Horizon Health and Wellness will provide brochures to the general public that describe services available to the public, including transportation.
- 4) Horizon Health and Wellness lists services on its website and utilizes social media via the agency Facebook page.

Horizon Health and Wellness submits to the City of Phoenix annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

HORIZON HEALTH AND WELLNESS

Limited English Proficiency Plan

Horizon Health and Wellness has adopted the City of Phoenix Language Assistance Plan, which is attached.

Non-elected Committees Membership Table

BODY	CAUCASIAN	LATINO	AFRICAN AMERICAN	ASIAN AMERICAN	NATIVE AMERICAN
POPULATION					
BOARD OF DIRECTORS	46%	9%	36%	9%	

Excerpt from the Corporate By-Laws:

The Board of Directors shall attempt to recruit new Board members on a catchment area basis and in a manner which ensures that minorities and individuals with disabilities are strongly encouraged to apply. The Board shall make reasonable accommodation to the needs of applicants with disabilities and shall ensure that applicable equipment is available and that meeting places are accessible.

X- Horizon Health and Wellness does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

X- Horizon Health and Wellness does NOT monitor subrecipients for Title VI compliance.

Horizon Health and Wellness currently has no subrecipients.

Title VI Equity Analysis

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

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

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

Horizon Health and Wellness has no current or anticipated plans to develop new transit facilities covered by these requirements. The Agency has not previously been involved in developing or constructing facilities covered by these requirements.

Board Approval for the Title VI Program

See the attached Corporate Resolution, showing approval by the Board of Directors of Horizon Health and Wellness for the Agency's Title VI program.



Laura Larson-Huffaker, M.C., LPC
Chief Executive Officer

Board of Directors

CORPORATE RESOLUTION

Robert Huddleston
President
Casa Grande, AZ

Quindia Palmer
President-Elect
Casa Grande, AZ

Brent Billingsley
Treasurer
Casa Grande, AZ

Raul Fiveash
Secretary
Yuma, AZ

William Pearlman
Mesa, AZ

Carolyn Fairall
Apache Junction, AZ

Sarah Garland
Casa Grande, AZ

Mike Farber
Gold Canyon, AZ

Bryan Alford
Casa Grande, AZ

Elizabeth Bursey
Casa Grande, AZ

Himanshu Patel
Florence, AZ

WHEREAS, at a duly held and conducted meeting of the Board of Directors of Horizon Health and Wellness on Wednesday, March 13, 2019, and in response to a request from the Federal Transit Administration (FTA) Section 5310 Grant for approval of a Title VI Implementation Plan.

NOW THEREFORE, be it resolved that the membership did review and hereby approve the Title VI Implementation Plan as presented.

RESOLVED, FURTHER that the proper officers of Horizon Health and Wellness are each hereby authorized and directed in the name of and on behalf of Horizon Health and Wellness, to take any and all actions necessary to effect this resolution.

IN WITNESS WHEREOF, I have hereunto signed on the 13th day of March, 2019.

A handwritten signature in black ink, appearing to read "Robert Huddleston", is written over a horizontal line.

Robert Huddleston, President, Board of Directors

Subscribed and sworn before me this 13th day of March, 2019.



Title VI Complaint Form

Note: The following information is needed to assist in processing your complaint.

Complainant's Information:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

Person Discriminated Against (someone other than complainant)

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

Which of the following best describes the reason you believe the discrimination took place?

Race/Color (Specify) _____ National Origin (Specify) _____

On what date(s) did the alleged discrimination take place? _____

Describe the alleged discrimination. Explain what happened and who you believe was responsible (if additional space is needed, add a sheet of paper).

List names and contact information of persons who may have knowledge of the alleged discrimination.

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Check all that apply.

Federal Agency Federal Court State Agency State Court Local Agency

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

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Work Phone Number: _____

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

Complainant Signature Date Number of Attachments _____

Submit form and any additional information to:

Horizon Health and Wellness Title VI Program
Marsha Ashcroft, Title VI Program Coordinator
210 E. Cottonwood Lane, Casa Grande, AZ 85122
Phone: 520-836-1688 Fax: 520-421-2708
marsha.ashcroft@hhwaz.org

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

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

Información de la persona que está poniendo la queja:

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

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

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

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

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

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

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

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

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

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

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

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

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

Firma de la Persona que presenta la queja Fecha

Número de Anexos: _____

Someta la forma y cualquier información adicional a:

Horizon Health and Wellness Title VI Program
Marsha Ashcroft, Title VI Program Coordinator
210 E. Cottonwood Lane, Casa Grande, AZ 85122
Teléfono: 520-836-1688 Fax: 520-421-2708
marsha.ashcroft@hhwaz.org



Language Assistance Plan

Title VI Program

July 2018



1.0 INTRODUCTION

In 1993, the Valley Metro Regional Public Transportation Authority (RPTA) board adopted the name Valley Metro as the identity for the regional transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that serves more than 73 million riders annually. Valley Metro provides fixed route bus service, light rail service and complementary paratransit service across the region. Valley Metro distributes transit funds from the countywide transit sales tax to its member agencies including the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, and Maricopa County. For the most part, Valley Metro and its member agencies utilize service providers for operations of bus, light rail and paratransit services. The cities of Glendale, Scottsdale, Peoria, and Phoenix contract some of their service directly to service providers.

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

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

1.1 Regulatory Guidance

Title VI of the Civil Rights Act of 1964, provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” issued on August 11, 2000, directs each federal agency to publish guidance for its respective recipients in order to assist with its obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Providing English-

only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

The FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, issued in October 2012 reiterates this requirement. Chapter III states that — FTA recipients must take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (page III-6).”

In the Phoenix Metropolitan Area, there are over seventy different languages identified in households where English is not the predominate language. Using the “Four Factor Analysis” prescribed by the FTA, this plan was developed to ensure that all transit providers effectively communicate with all users of the public transportation agency’s services provided.

1.2 Four Factor Analysis

The FTA Circular 4702.1B identifies four factors that recipients of federal funds should follow when determining what reasonable steps should be taken to ensure meaningful access for LEP persons.

The four factor analysis involved the following:

1. Identify the number or proportion of LEP persons eligible to be served or likely to be encountered with transit service.
2. Determine the frequency with which LEP individuals come in contact with transit service.
3. Determine the nature and importance of transit service provided to LEP individuals.
4. Assess the resources available to the recipient for LEP outreach, as well as costs associated with that outreach.

This document describes Valley Metro’s four-factor analysis and summarizes its LEP efforts, including staff training, followed by a description of how the plan will be monitored and updated.

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

The Factor 1 analysis assessed the number and proportion of persons with limited English speaking proficiency likely to be encountered within the service area, which is defined as a one-half mile radial buffer around all fixed route services. The LEP population is those individuals who reported to the Census Bureau that they speak English “less than very well.”

2.1 Evaluation Methods and Data Sources

In accordance with the FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the Valley Metro service area was completed through an analysis of several data sources, including:

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

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

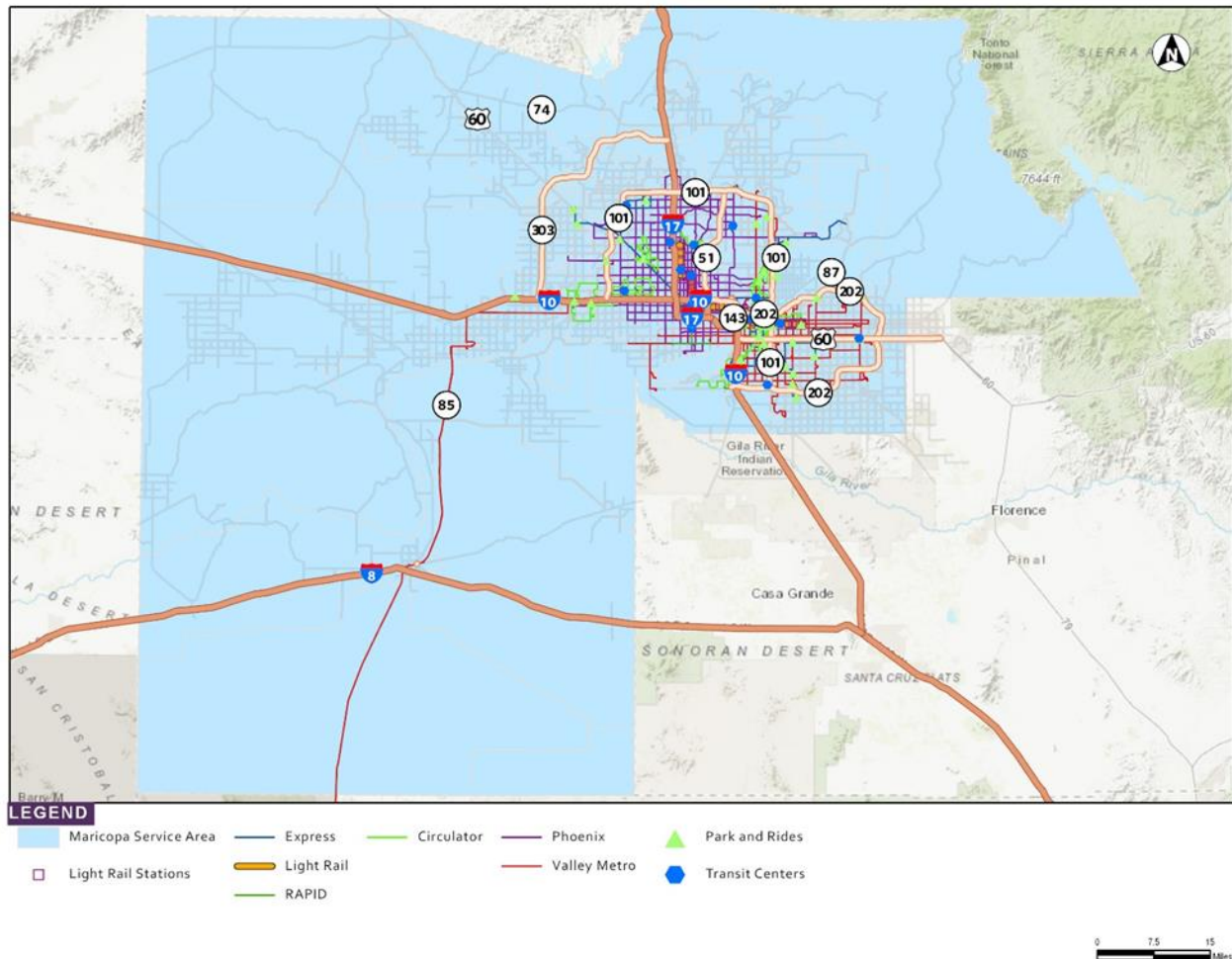
2.2 LEP Population Identification

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

Census 2000

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

Figure 1: 2018 Maricopa County and Fixed Route Transit Service



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

Table 1: 2000 Census Data by Location

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
Maricopa County	2,832,694	2,148,696	355,963	328,035	11.6%
Census Tracts within ½ -mile fixed routes	2,651,705	1,986,112	344,003	321,590	12.1%

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

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

Table 2: 2000 Census Data by Language Category

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
Total	2,651,705	344,003	133,047	113,289	75,254	12.1%
English	1,986,112	-	-	-	-	0.0%
Spanish	528,613	252,587	103,991	99,549	72,486	10.4%
Indo-European	66,605	47,582	12,276	5,667	1,080	0.7%
Asian or Pacific Islander	44,109	24,273	12,210	6,372	1,254	0.7%
All Other Languages	26,266	19,561	4,570	1,701	434	0.3%

The Census 2000 data also provide information on linguistically isolated households. “A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English ‘very well.’ In other words, all members 14 years old and over have at least some difficulty with English” (Census 2000). In total, the Census 2000 Summary File 3 data identified 1,048,128 households. The entire membership of a linguistically isolated household would be considered LEP. Table 3 details those data for linguistically and non-linguistically isolated households by language category.

Table 3: 2000 Census Data by Linguistically Isolated Households

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

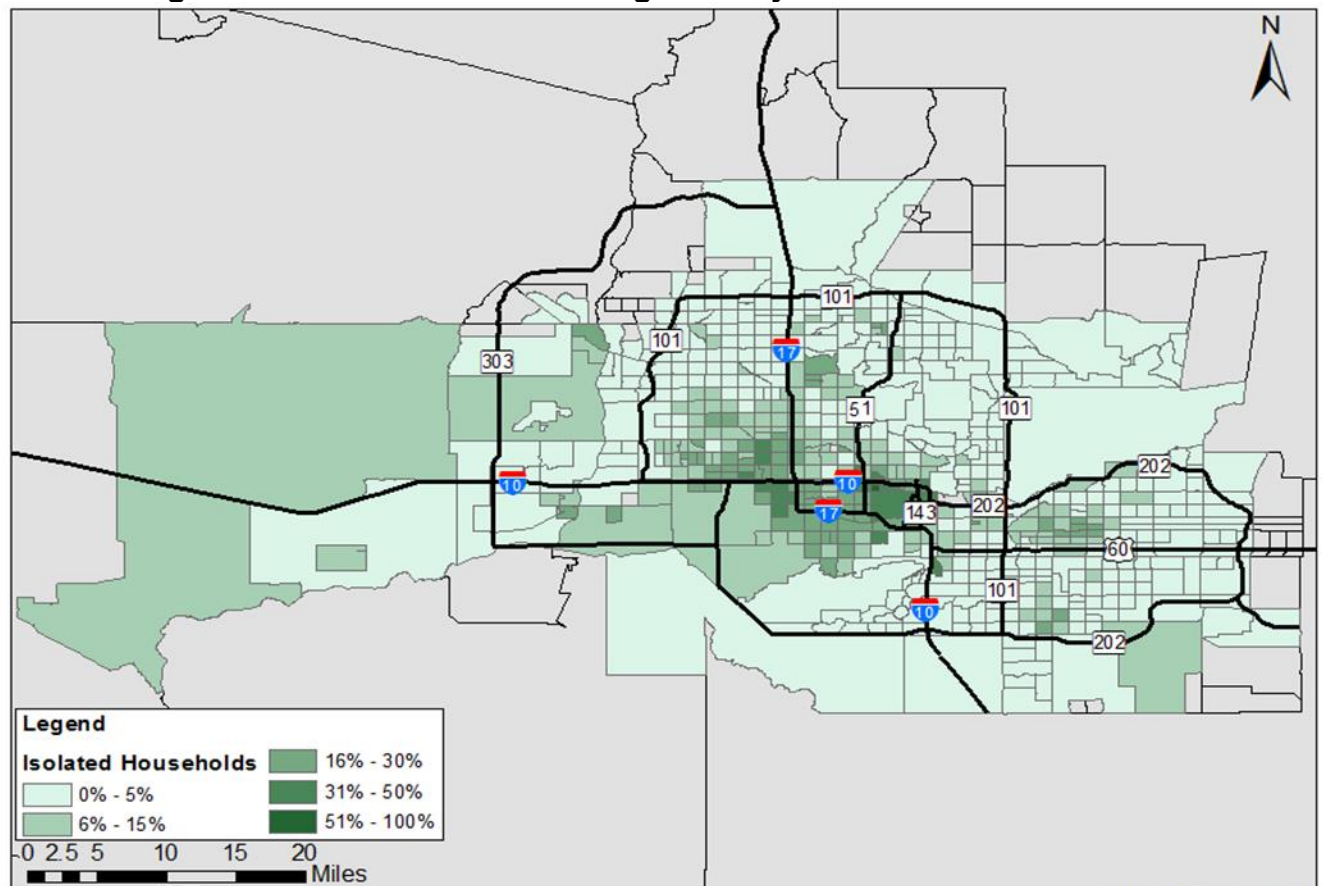
Within the fixed route transit area 5.9 percent of households are considered linguistically isolated. Again, these are predominately Spanish households making up 4.9 percent of the total. Remaining languages comprise 1.1 percent of households that are classified as linguistically isolated.

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

American Community Survey

The American Community Survey (ACS) is a continuous nationwide survey conducted monthly by the U.S. Census Bureau to produce annually updated estimates for the same small area (census tracts and block groups) formerly surveyed via the decennial census long-form survey. It is intended to measure changing socioeconomic characteristics and conditions of the population on a recurring basis. It is important to note that the ACS does not provide official counts of the population between each decennial census, but instead provides weighted population estimates. This analysis uses ACS data from 2013 and 2016 to show changes over time, especially since the decennial 2010 census did not provide this information.

Figure 2: Census Tracts with Linguistically Isolated Households

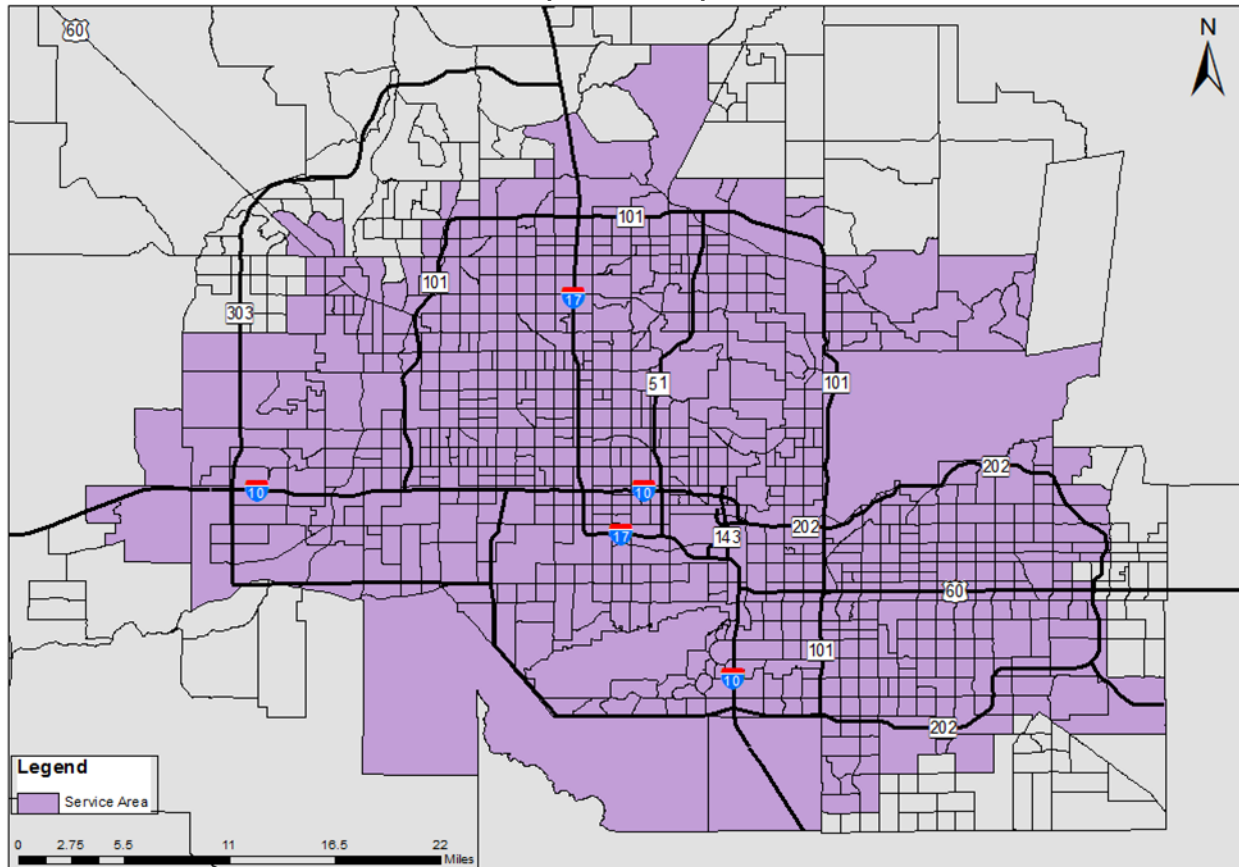


Source: Census 2000

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

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

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



Source: ACS 2013

Table 4: ACS 2013 and 2016 Data by Location

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
2013 ACS					
Maricopa County	3,610,510	2,660,946	589,679	359,884	10.0%
Census Tracts 1/2-mile fixed routes	3,051,428	2,171,136	540,216	340,076	11.1%
2016 ACS					
Maricopa County	3,812,399	2,804,227	646,236	354,052	9.29%
Census Tracts 1/2-mile fixed routes	3,154,617	2,229,062	595,430	330,125	10.46%

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

Table 5: 2013 and 2016 ACS Census Data by Language Category

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
2013						
Total	3,002,765	536,151	140,541	126,210	71,269	11.2%
English	2,128,594	-	-	-	-	0.0%
Spanish	687,532	413,750	102,250	106,330	65,202	9.1%
Indo-European	75,146	56,623	12,386	5,048	1,089	0.6%
Asian or Pacific Islander	73,402	40,115	18,746	10,946	3,595	1.1%
All Other Languages	38,091	25,663	7,159	3,886	1,383	0.4%
2016						
Total	3,154,617	595,430	134,971	117,834	77,320	10.4%
English	2,229,062	-	-	-	-	0.0%
Spanish	725,756	463,540	94,718	97,718	69,780	8.3%
Indo-European	74,471	55,554	12,484	4,611	1,822	0.6%
Asian or Pacific Islander	81,683	46,873	19,589	11,272	3,949	1.1%
All Other Languages	43,645	29,463	8,180	4,233	1,769	0.4%

The 2016 ACS data also provide information on linguistically isolated households. “A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English ‘very well.’ In other words, all members 14 years old and over have at least some difficulty with English” (ACS 2016). In total, the 2016 ACS data identified 1,380,916 households. The entire membership of a linguistically isolated household would be considered LEP. Table 6 details those data for linguistically and non-linguistically isolated households by language category.

Table 6: 2016 ACS Data by Linguistically Isolated Households

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

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

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

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

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

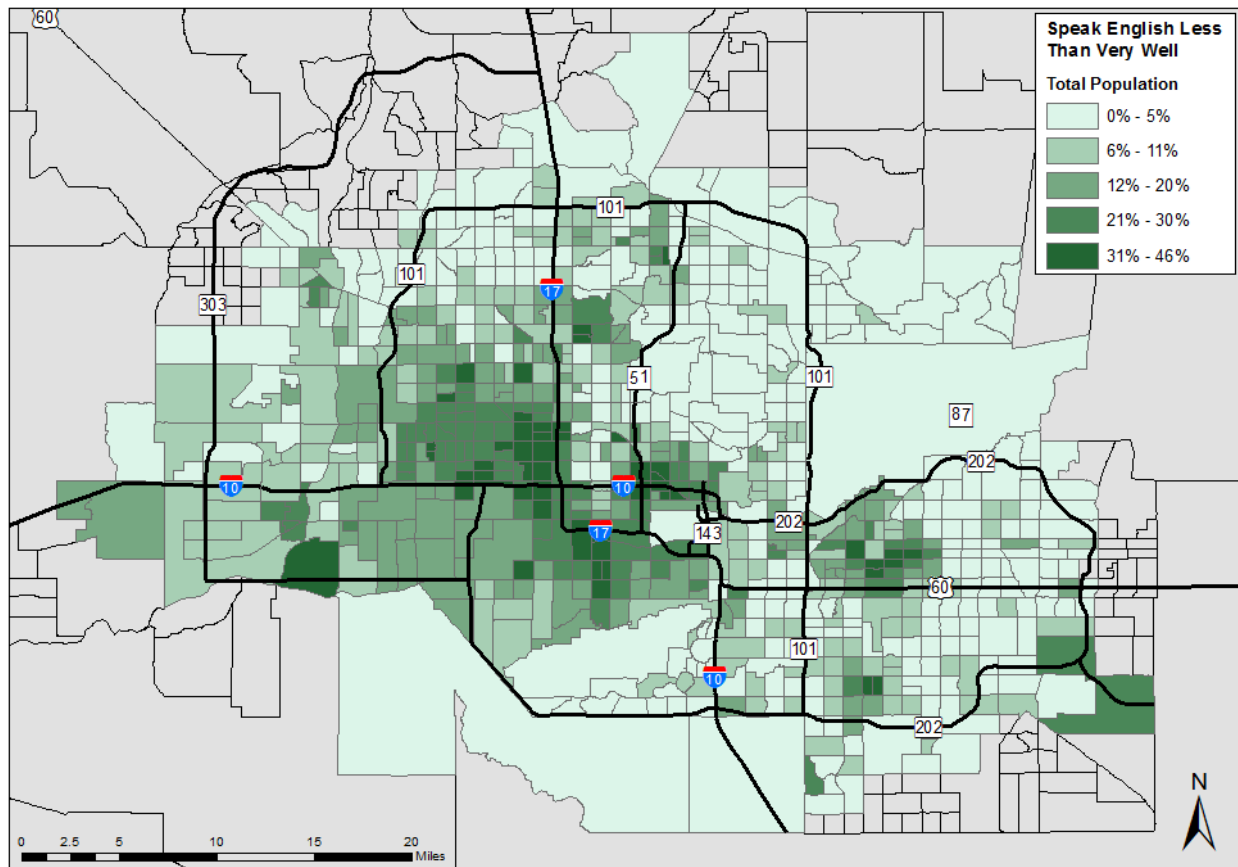
The ACS 2016 LEP populations within the service area are very similar to the 2013 ACS LEP populations.

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

Table 7: ACS Data by Language within One-Half Mile of Fixed Route Service

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

Figure 4: Population Speaking English “Less than Very Well”



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

The first step of the four-factor LEP needs assessment revealed that the largest language group was overwhelmingly Spanish; followed by Chinese, Vietnamese, Arabic, and Tagalog. Factor 2 is intended to assess the frequency with which LEP persons interact with Valley Metro programs, activities, or services. The USDOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Person” (USDOT 2005) advises that:

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

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

3.1 Evaluation Methods and Data Sources

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

- Transit Employee Survey
- Customer Service Interactive Voice Response (IVR) Call Log
- Transit Education Program
- Valley Metro Website Translation Data

Together these sources provide a picture of the interaction of LEP persons with programs, activities, or services provided by the agency.

3.2 Frequency of Contact Analyses

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

Transit Employee Survey

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

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

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

- Sunnyslope Transit Center
- Tempe Transportation Center

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

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

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

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

Figure 5: Requests for Information or Materials in Another Language

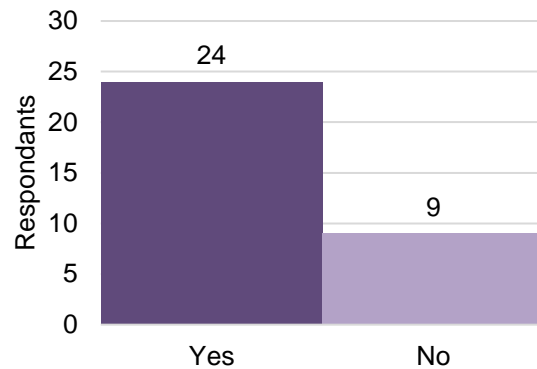
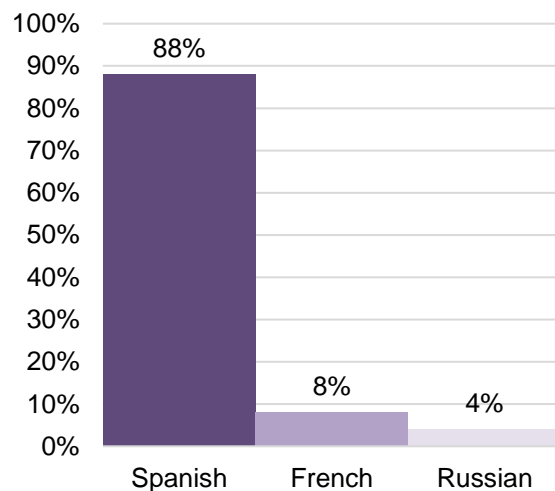
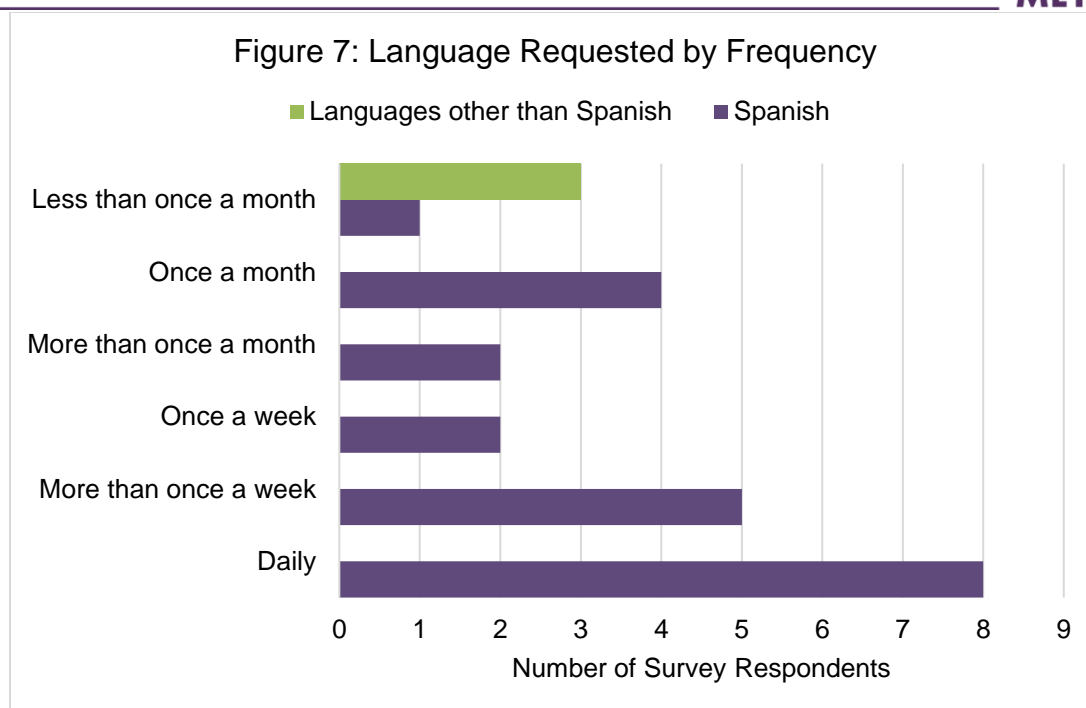


Figure 6: Requested Languages



These responses were categorized appropriately and cross-referenced with the language requested. See Figure 7 for a comparison. Spanish was much more frequently requested than any other language. Additionally, languages other than Spanish were requested at a less frequent rate.



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-2014² 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. Acknowledging that this is a truncated data

² Data available July 2014 through April 2015

set, Table 7 below shows the distribution of calls by option selected, followed by the sum of calls by language.

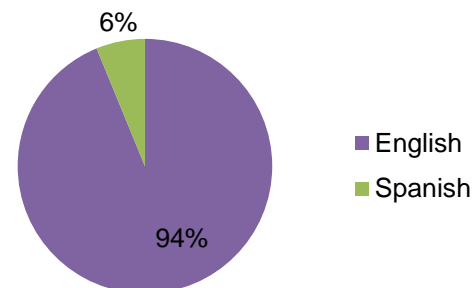
Table 7: Customer Service Call Log

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

Figure 8 shows a pie chart of the calls by language. Approximately 94% of calls were for English and 6% of calls were for Spanish. At the time of this report, 38 customer service representatives were currently on staff; of these, twelve are bilingual (32%).

When evaluating the customer service call logs, the bulk of calls received are through the English phone lines with a small portion (6%) selecting a Spanish option.

Figure 8: Customer Service Calls by Language



Transit Education Program

Valley Metro has a Transit Education program that presents information to various groups to teach about public transit, benefits of transit, and how to use the system. Staff members visit schools, businesses, social service agencies and present to new residents and refugee groups, senior citizens and persons with disabilities. Additionally, transit information and assistance 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

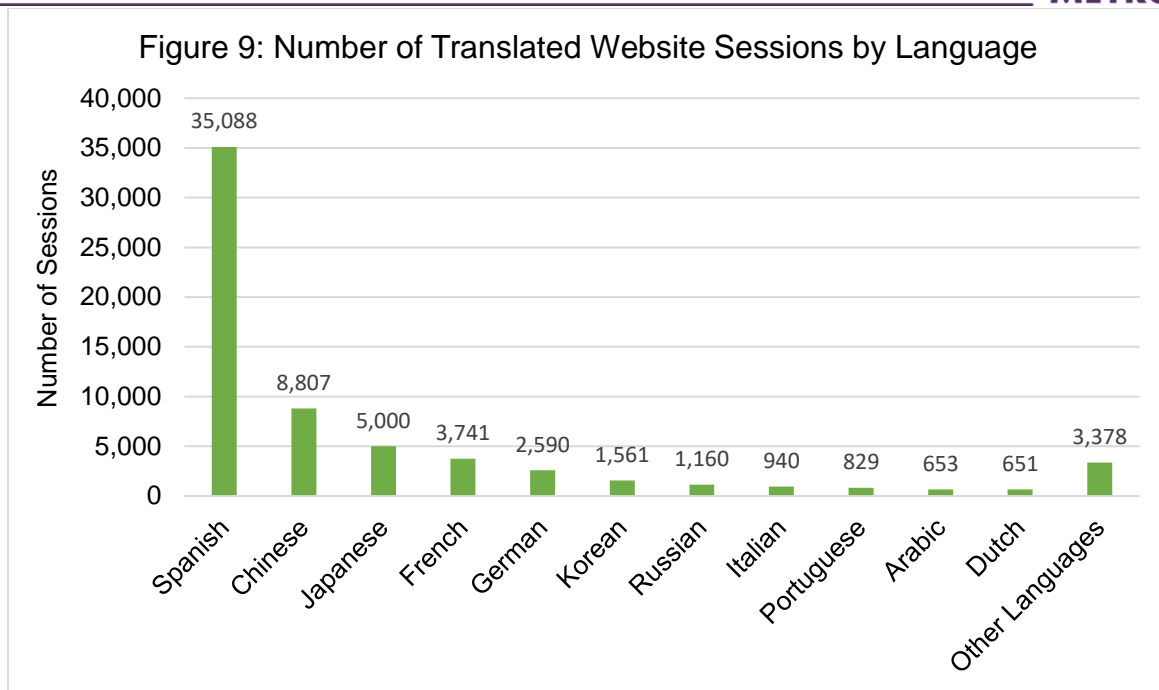
Apart from accessing information via transit employees whether by phone, email, in person or another method, many customers utilize the www.valleymetro.org website for information. During this time the website was equipped with the Google Translate feature, which allows translation into 90 languages. 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 Language³

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.

³ 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 70% 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 6% 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 VMS⁴ 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. The organizations interviewed range from cultural adult centers to refugee services organizations.

Key findings from outreach effort:

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

⁴ Variable message signs
Language Assistance Plan

Community Organizations Interviews

In 2015 Valley Metro interviewed six community organizations to garner insight on the use and role of Valley Metro services to the LEP populations within the Phoenix Metropolitan region. These six organizations include:

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

Organizations were identified to ensure that a wide variety of cultural and language groups were reached over large service areas. These organizations indicated that they serve populations speaking a broad range of languages, including Spanish, Arabic, Somali, Chinese, Burmese and French.

Participating agencies were asked a series of questions from the FTA handbook “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (FTA 2007b). Organizations interviewed expressed needs of LEP populations regarding language assistance including:

- **System Map Information:** LEP populations have expressed a difficulty in understanding and familiarizing themselves with system maps.
- **On-Board Messaging:** LEP populations have expressed hardship in reading and understanding on-board signage/message boards as well as driver instructions.
- **Transit Service Information:** LEP populations have expressed the desire for information, such as how to ride and fare payment information, be communicated in an understandable format. Symbols could be used to communicate messages to a wider audience. Also, offering orientation to these populations, through their respective agencies, would familiarize them with the transit system.

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 VMS⁵ 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

⁵ LINK stations, light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities

improvements that could be made so that the system is more easily understood visually. With expanded symbolism, it is expected that the need for enhancing the on-board messaging and system map information may be reduced. Furthermore, these could be incorporated into the regular updates of this information and signage. Biannually in coordination with the service changes, updated system maps are produced.

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

6.0 LANGUAGE ASSISTANCE MEASURES

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

6.1 Current Language Assistance Measures

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

Written Spanish language assistance includes signage, press releases, list serve messages, service change materials, Title VI complaint forms, policies, and procedures. Additional translation of some vital documents is provided, such as schedules, maps, ride and destination guides, route scouts, and more. Meeting notices and public input surveys at public meetings are translated. The website is equipped with the Google Translate feature, which allows translation into 5 languages (www.translate.google.com). Fare vending machines provide Spanish and Braille translations as well.

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

6.2 Staff Training

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

Using the customer service center as an example, Spanish calls are assigned directly to a Spanish-speaking representative through the phone system. In the customer assistance system a note is made that the customer speaks Spanish so that if the query is not able to be responded to immediately, any response is assigned to another bilingual representative. This training is implanted into general customer assistance staff training to ensure cost effective practices and efficient use of training resources. Title VI of the Civil Rights Act of 1964 is distributed to new employees and where applicable, employees are expected to know how to file discrimination claims based on race, color, or national origin. Additionally, there are related trainings available including quarterly Civil Rights Workshops, training sessions for conducting complaint investigations according to federal guidelines and streamlining the complaint investigative process.

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

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

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

6.3 Future Language Assistance Services

With the development of subsequent Language Assistance Plans, it is expected that through the monitoring, evaluation, and update process that additional services continue to be identified and considered for feasibility of implementation. Valley Metro strives to serve LEP populations adequately with an equal opportunity to use transportation options available. Section 7 provides more information about the monitoring and update process of this plan.

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

Triennially Valley Metro will review, monitor, and update this LAP. Feedback from agency staff and community members will be accepted throughout the year at the email address: TitleVICoordinator@ValleyMetro.org. Additional community feedback may be elicited during the update process. Internal monitoring will be conducted using the template provided from the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007b). Using this checklist periodically, stations, vehicles, customer service, community outreach, and public relations are monitored.

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

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

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



APPENDIX A – FULL LIST OF LANGUAGES

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

Language Category Group	Total Population	Percent age of Total LEP Population
All Languages Speaks English Less Than Very Well (LEP Population within Service Area)	791,547	-
Spanish	808,412	-
Spanish Speak English Very Well	528,695	-
Spanish Speak English Less Than Very Well	279,717	35.34%
French (Including Cajun)	10,704	-
French Speak English Very Well	8,109	-
French Speak English Less Than Very Well	2,595	0.33%
Haitian	357	-
Haitian Speak English Very Well	253	-
Haitian Speak English Less Than Very Well	104	0.0001 %
Italian	4,565	-
Italian Speak English Very Well	3,541	-
Italian Speak English Less Than Very Well	1,024	0.13%
Portuguese	2,335	-
Portuguese Speak English Very Well	2,180	-
Portuguese Speak English Less Than Very Well	155	0.0001 %
German	11,223	-
German Speak English Very Well	10,177	-
German Speak English Less Than Very Well	1,046	0.13%
Yiddish, Pennsylvania Dutch, or Other West Germanic	1,605	-
Yiddish Speak English Very Well	1,605	-
Yiddish Speak English Less Than Very Well	0	0.00%
Greek	1,140	-
Greek Speak English Very Well	1,052	-
Greek Speak English Less Than Very Well	88	0.0001 %
Russian	3,153	-
Russian Speak English Very Well	2,578	-
Russian Speak English Less Than Very Well	575	0.0007 %
Polish	5,665	-
Polish Speak English Very Well	4,083	-
Polish Speak English Less Than Very Well	1,582	0.19%
Serbo-Croatian	5,431	-
Serbo-Croatian Speak English Very Well	4,228	-
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	-
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	1.33%
Khmer	1,559	-
Khmer Speak English Very Well	736	-

Khmer Speak English Less Than Very Well	823	0.00%
Telugu	6,379	
Telugu Speak English Very Well	5,594	
Telugu Speak English Less Than Very Well	785	
Tamil	3,872	
Tamil Speak English Very Well	3,374	
Tamil Speak English Less Than Very Well	498	
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	
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	0.26%
Other Asian	3,838	-
Other Asian Speak English Very Well	2,308	-
Other Asian Speak English Less Than Very Well	1,530	0.09%
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	1.21%
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	0.38%
Navajo	11,895	-
Navajo Speak English Very Well	10,812	-
Navajo Speak English Less Than Very Well	1,083	0.36%
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	0.11%
Yoruba, Twi, Igbo, or other languages of Western Africa	4,071	-
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	0.07%
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	0.08%
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	0.98%
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	
Other Languages	2,321	-
Other Languages Speak English Very Well	1,793	-
Other Languages Speak English Less Than Very Well	528	0.66%

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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	21,628,079 ⁶	100%
English	21,392,285	98.91%
Other Languages	222,177	1.03%
Language	Number of Sessions	Percent of Non-English Sessions
Spanish	123,377	0.57%
Chinese	26,684	0.12%
Japanese	13,950	0.06%
German	11,502	0.05%
French	10,316	0.05%
Korean	7,496	0.03%
Portuguese	6,225	0.03%
Italian	3,638	0.02%
Russian	3,303	0.02%
Dutch	2,576	0.01%
Arabic	1,822	0.01%
Swedish	1,483	0.01%
Turkish	1,221	0.01%
Polish	1,127	0.01%
Czech	839	0.00%
Norwegian	771	0.00%
Danish	726	0.00%
Vietnamese	670	0.00%
Hebrew	645	0.00%
Hungarian	645	0.00%
Finnish	531	0.00%
Thai	335	0.00%
Slovak	309	0.00%
Greek	293	0.00%
Romanian	232	0.00%
Indonesian	217	0.00%
Bulgarian	173	0.00%
Catalan	122	0.00%
Croatian	110	0.00%
Slovenian	101	0.00%
Persian	93	0.00%
Filipino	89	0.00%
Serbian	84	0.00%
Afrikaans	76	0.00%
Lithuanian	67	0.00%
Ukrainian	66	0.00%
Latvian	53	0.00%
Icelandic	31	0.00%

⁶ There were 13,829 entries included that did not have a valid ISO language code associated with the website visit; thus the sum of languages will fall short.

Estonian	24	0.00%
Marathi	16	0.00%
Kanuri	15	0.00%
Hindi	10	0.00%
Tagalog	10	0.00%
Azerbaijani	8	0.00%
Breton	8	0.00%
Malay	8	0.00%
Pushto	8	0.00%
Telugu	8	0.00%
Walloon	6	0.00%
Bengali	5	0.00%
Esperanto	5	0.00%
Macedonian	5	0.00%
Navajo	5	0.00%
Albanian	4	0.00%
Malay	4	0.00%
Acoli	3	0.00%
Georgian	3	0.00%
Kannada	3	0.00%
Tonga	3	0.00%
Armenian	2	0.00%
Bosnian	2	0.00%
Galician	2	0.00%
Gujarati	2	0.00%
Irish	2	0.00%
Javanese	2	0.00%
Malayalam	2	0.00%
Turkmen	2	0.00%
Aymara	1	0.00%
Welsh	1	0.00%