



City of Phoenix
Public Transit Department



TITLE VI
PROGRAM
NOVEMBER 2018

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Section 1: Introduction



1.1 Program Overview

According to Section 601 of Title VI of the Civil Rights Act of 1964:

“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 subjected to discrimination under any program or activity receiving federal financial assistance.”

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activities are Federally funded. The term “program or activity” means all of the operations of a department, agency, special purpose district, or government; or the entity of such State or local government that distributes such assistance and each such department or agency to which the assistance is extended, in the case of assistance to a State or local government (FTA C 4702.1B, Chap. II-1). The Federal Transit Administration (FTA), from which city of Phoenix receives Federal funds, is required to fulfill the US Department of Transportation’s (USDOT) Title VI regulations (49 CFR part 21).

To ensure compliance with the requirements of Title VI, city of Phoenix is required to adopt a Title VI Program. The contents of this document follow the requirements and guidelines of FTA’s Title VI Circular (FTA C 4702.1B).

1.2 City of Phoenix History

Hundreds of years before any of the cities in the eastern part of our country were so much as clearings in the wilderness, a well-established, civilized community occupied the land we know as Phoenix. The Pueblo Grande ruins, which were occupied between 700 A.D. and 1400 A.D., testify to our City’s ancient roots.

The wide Salt River ran through the Valley of the Sun, but there was little rain and no melting snow to moisten the brown earth from river to mountain range on either side.

Those former residents were industrious, enterprising and imaginative. They built an irrigation system, consisting mostly of some 135 miles of canals, and the land became fertile. The ultimate fate of this ancient society, however, is a mystery. The accepted belief is that it was destroyed by a prolonged drought. Roving Indians, observing the Pueblo Grande ruins and the vast canal system these people left behind, gave them the name “Ho Ho Kam” -- the people who have gone.

Phoenix's modern history begins in the second half of the 19th century. In 1867, Jack Swilling of Wickenburg stopped to rest his horse at the foot of the north slopes of the White Tank Mountains. He looked down and across the expansive Salt River Valley and his eyes caught the rich gleam of the brown, dry soil turned up by the horse's hooves. He saw farm land, predominately free of rocks, and in a place beyond the reach of heavy frost or snow. All it needed was water.

Returning to Wickenburg, he organized the Swilling



Section 1: Introduction

Irrigation Canal Company, and moved into the Valley. The same year, the company began digging a canal to divert some of the water of the Salt River onto the lands of the Valley. By March 1868, water flowed through the canal, and a few members of the company raised meager crops that summer.

Phoenix Is Born

By 1868, a small colony had formed approximately four miles east of the present city. Swilling's Mill became the new name of the area. It was then changed to Helling Mill, after which it became Mill City, and years later, East Phoenix. Swilling, having been a confederate soldier, wanted to name the new settlement Stonewall after Stonewall Jackson. Others suggested the name Salina, but neither name suited the inhabitants. It was Darrell Duppa who suggested the name Phoenix, inasmuch as the new town would spring from the ruins of a former civilization. That is the accepted derivation of our name.

Phoenix officially was recognized on May 4, 1868, when the Yavapai County Board of Supervisors, the county of which we were then a part, formed an election precinct here.

President William Howard Taft approved Arizona's statehood on Feb. 14, 1912. On March 18 of the same year, Gov. George Hunt called the first State Legislature into session. This was an auspicious step in the state's history, and in the following year, the city of Phoenix took an equally important one. At a special election on October 11, 1913, the people of Phoenix, by a vote of nearly two to one, ratified a new charter. The charter gave Phoenix the council-manager form of government. Thus, Phoenix became one of the first cities in the nation to adopt this progressive form of government.

Growing into a Metropolis

Like its legendary namesake rising out of the ashes, Phoenix has emerged as one of the bright new cities of the 21st century. Phoenix is the core of Maricopa County and the state's population and economic center.

Home to more than 1.4 million residents, Phoenix spans more than 500 square miles and ranks as the sixth-largest city in the United States. Phoenix is a premier destination, offering the best of both worlds: a growing economy and a great place to live with more than 300 sun-filled days a year and an almost limitless supply of outdoor activities in



Section 1: Introduction

the beautiful Sonoran Desert.

Phoenix's location, coupled with its regional transportation plan including highways, light rail, buses and railroad networks, plays a principal role in its population and economic growth.

City of Phoenix Public Transit Department Mission

To keep Phoenix moving through reliable, innovative transit services for our community.

City of Phoenix Public Transit Department Vision

The recognized leader in multi-modal transit solutions connecting people and destinations.

1.3 City of Phoenix Public Transit Department

The Phoenix Public Transit Department is a member of the 16 agency regional transit system under the system name of Valley Metro.

In 1993, the Regional Public Transit Authority board adopted the name Valley Metro as the identity for the transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that the public sees on the streets today. Valley Metro Board member agencies include Avondale, Buckeye, Chandler, El Mirage, Gilbert, Glendale, Goodyear, Maricopa County, Mesa, Peoria, Phoenix, Scottsdale, Surprise, Tempe, Tolleson and Wickenburg.

The city of Phoenix is the primary recipient of federal funding for public transit in the region, and therefore is responsible for oversight of all Valley Metro members that receive federal funding for public transit, as well as recipients of federal 5310 grant funding for transportation services to seniors and people with disabilities.

With an annual operating budget of \$315 million and with an administrative staff of 115 positions, the Phoenix Public Transit Department oversees and monitors operations of three private companies that provide transit service to the city of Phoenix

and other Valley Metro member cities, and provides oversight to the rest of the system's service provided by the regional public transit authority under the name Valley Metro.

The city of Phoenix manages transit services to include 37 local bus routes, six RAPID commuter routes, three neighborhood circulators, 1 downtown business circulator and alternative transportation for people with disabilities and senior citizens. With a transportation fleet of 507 buses covering 20.3 million miles of service within the city of Phoenix, the department provides more than 70 percent of the region's transit. Valley Metro operates the majority of the remaining transit service on behalf of Valley Metro member cities.

The Phoenix Public Transit Department also takes a leading role in the development and oversight of the region's 26-mile light rail line. Working with Valley Metro and other Valley Metro agency partners, Phoenix helps to deliver seamless regional transit services under the name Valley Metro.

The city of Phoenix funds much of its transit service through Transit 2050 - a local sales tax approved by Phoenix voters, a portion of a regional sales tax known as Proposition 400, and other federal, state and local sources.

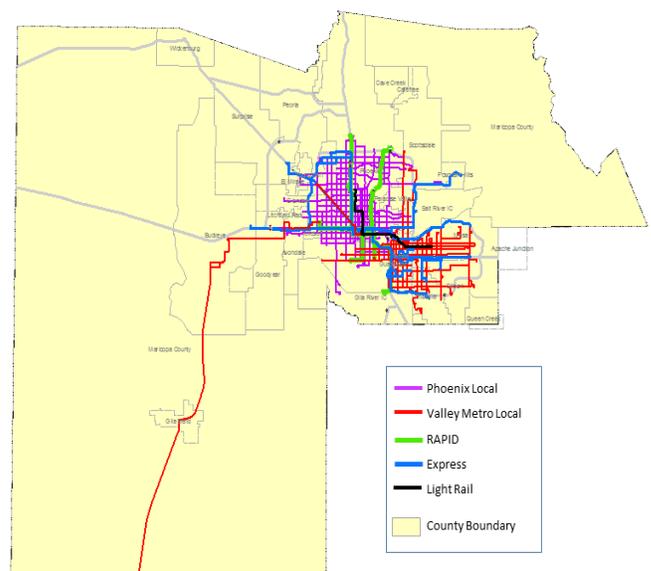


Figure 1: Phoenix/Valley Metro System Transit Map (as of June 2018)

Section 1: Introduction

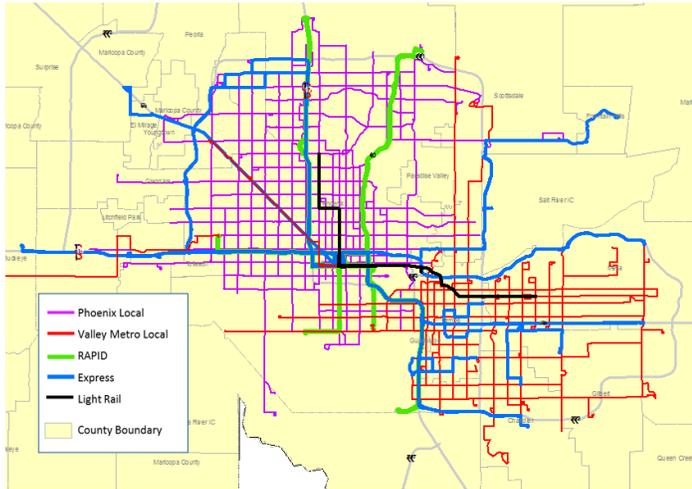


Figure 2: Maricopa County and Fixed Route Transit Service

1.4 Services Provided

Local Fixed Route Bus Service

The city of Phoenix operates thirty-seven local routes that connect customers to work, school, retail and recreational opportunities, and other destinations. Fixed route service is provided with 40-foot bus or 60-foot articulated bus. While service frequency, hours, and days vary by route, the bus system operates seven days a week from 4:00 a.m. to 12:00 a.m. Fixed route buses can accommodate up to three bicycles.

Express Bus Service

Twenty-one regional express bus services traveling mostly along interstates and connecting some of the region's largest employers, including Arizona Department of Transportation and Maricopa County. Express routes have limited stops for faster connections. Routes are designed for commuter service, only operating during peak periods.

Regional Fixed Route Bus Service

Valley Metro in coordination with the city of Phoenix operates all routes outside of Phoenix' boarders, these routes connect customers to work, school, retail and recreational opportunities, and other destinations. Fixed route service is provided with 40-foot or 60-foot articulated bus. While service frequency, hours, and days vary by route, the bus system operates seven days a week from 4:00 a.m. to 12:00 a.m. Fixed route buses can accommodate up to three bicycles.

Neighborhood Circulators

Seventeen community circulators operate continu-

ously within distinct geographic areas to meet the transportation needs of the community. Service frequency, hours, and days vary by route. All buses providing this service are ADA accessible.

Light Rail Lines

Valley Metro operates the regions light rail that extends 26.3 miles with operating lines serving the cities of Phoenix, Tempe and Mesa. There are 23 stations with triple car platforms and ADA accessibility. In addition to 34 park-and ride locations that offer free parking, customers connect to light rail by walking, biking or riding one of the fixed routes that would connect to one of the 23 stations. Light Rail operates seven days a week from 4 a.m. to 12:00 a.m.

Vanpool Program

Van pool is a Transportation Demand Management program that helps decrease traffic congestion in the Region by offering commuters ways to reduce the number of times they commute to work alone. The Valley Metro Vanpool help people connect with one another so they can share rides, join a vanpool, telecommute when possible, or even bicycle to work.

Paratransit

Federally required service which provides shared ride door-to-door service to ADA certified passengers, who because of a disability are unable to independently navigate local public transit services. Service operates within the defined Phoenix Dial-a-Ride service area and operates during the same hours as local bus and light rail. Paratransit vehicles can accommodate up to eight ambulatory passengers, or five ambulatory and two wheelchair passengers.

Alternative Transportation

Provides alternative transportation solutions to older adults and ADA certified residents of Phoenix. Service is provided through a network of private transportation providers through independently owned and operated vehicles by participating transportation network drivers and taxi companies. Service is provided with minimal to no restriction on trip purpose or destination within the operating hours of the private transportation provider which is generally 24 hours a day and seven days a week.

Section 2: General Reporting Requirements

2.1 Policy Overview and Statement

The FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Please refer to Attachment J: Adopted Council (Board) Resolution, evidencing approval of city of Phoenix's Title VI Program. The General Reporting Requirements section of this report contains Title VI Program components required in Chapter III, of FTA Circular 4702.1B.

Figure 3: City of Phoenix, Title VI Policy Statement



Title VI Policy Statement

The following policy statement supports the implementation of these activities:

The City of Phoenix Public Transit Department is committed to ensuring that no person is discriminated against on the grounds of color, race, or national origin as provided by Title VI of the Civil Rights Act of 1964 and related legislation. Specifically, Title VI asserts 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 subjected to discrimination under any program or activity receiving federal financial assistance."

The City of Phoenix Public Transit Department strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. As a primary recipient of federal funding, the City of Phoenix Public Transit Department is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by the U.S. Department of Justice under 28 Code of Federal Regulations (CFR) § 42.401 *et seq.* and 28 CFR § 50.3. The U.S. Department of Transportation Title VI implementing regulations can be found at 49 CFR part 21.



Kenneth Kessler
Acting Public Transit Director



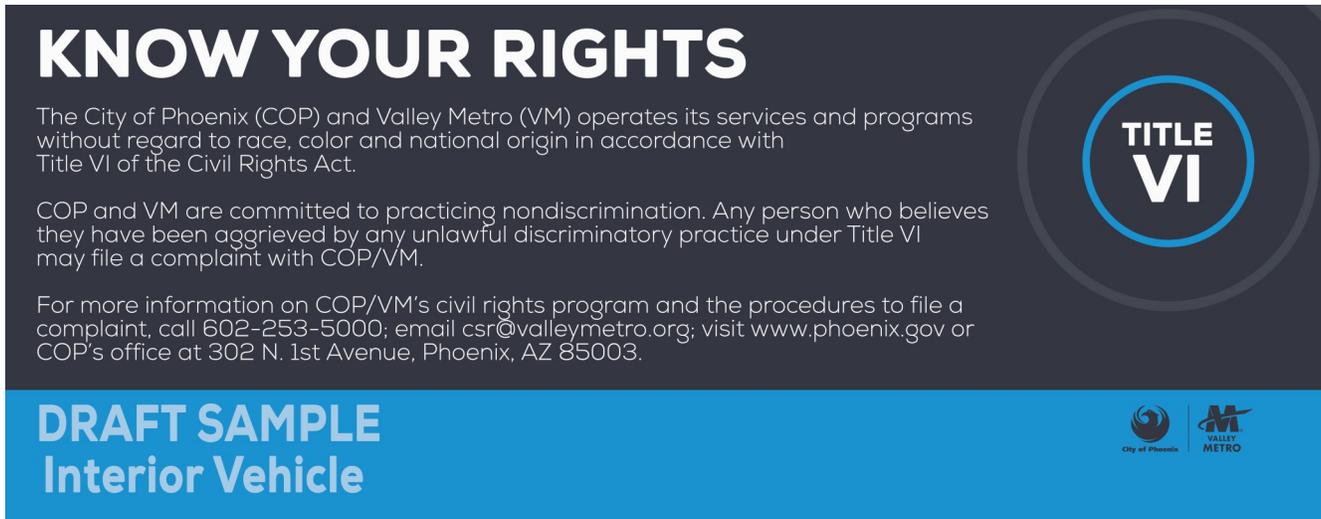
Date

Section 2: General Reporting Requirements

2.2 Title VI Notice to the Public

The following notice is posted on the Public Transit Department [website](#), in all vehicles (bus and rail), and in administrative offices. Table 1 list specific locations of where postings are displayed. The city of Phoenix notice is stated below:

Figure 4: Title VI Notice to the Public



KNOW YOUR RIGHTS

The City of Phoenix (COP) and Valley Metro (VM) operates its services and programs without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act.

COP and VM are committed to practicing nondiscrimination. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with COP/VM.

For more information on COP/VM's civil rights program and the procedures to file a complaint, call 602-253-5000; email csr@valleymetro.org; visit www.phoenix.gov or COP's office at 302 N. 1st Avenue, Phoenix, AZ 85003.

TITLE VI

DRAFT SAMPLE
Interior Vehicle

Section 2: General Reporting Requirements

2.2.1 Table 1: Facility Locations

City of Phoenix Public Transit Department							
Facility	Zip Code	Facility Type			Year Built	Site Size (acre)	Building (sq. ft.)
		Operating	Transit Ctr	Park-and-Ride			
302 Building (PTD Headquarters) 302 N. First Avenue	85003				1989	30,100 SF	107,318
North Transit Facility 2010 W. Desert Cove	85029	X			1980	9.9	34,480
South Transit Facility 2225 W. Lower Buckeye	85009	X			1983	15.5	126,000
West Transit Facility 405 N. 79 th Avenue	85043	X			2007	25.58	123,711
Central Station Transit Center 300 N. Central Avenue	85003		X		1997	2.6	4,000
Desert Sky Mall Transit Center 7887 W. Thomas Road	85033		X		2015	4.06	1624
Ed Pastor Transit Center 10 W. Broadway	85041		X		2003	4.4	4,200
Metrocenter Transit Center 9451 N. Metro Parkway	85051		X		1983	2.6	80
Paradise Valley Mall Transit Center 4623 E. Paradise Valley Pkwy North	85032		X		1990	1.0	153
Sunnyslope Transit Center 8927 N. Third Street	85020		X		1989	1.8	226
Happy Valley/117 Park-And-Ride 24725 N. 29 th Avenue	85027			X	2011	7.71	293
40 th St/Pecos Rd Park-and-Ride 17010 S. 40 th Street	85226			X	2003	16.84	293
79 th Ave/I-10 Park-and-Ride 7805 W. McDowell Road	85035			X	1990	9.0	433
Bell Road/I-17 Park-and-Ride 16808 N. Black Canyon Highway	85023			X	2000	5.5	293
Bell Road/SR51 Park-and-Ride 3535 E. Bell Road	85032			X	2003	5.6	293
Shea Blvd/SR51 Park-and-Ride 10203 N. 32 nd Street	85028			X	1997	7.5	293
27 th Ave/Base Rd. Park-and-Ride 2727 W. Baseline Rd.	85339			X	2012	2.63	254
24 th St/Baseline Park-and-Ride 7415 S. 24 th Street	85042			X	2015	7.15	255

2.3 Title VI Complaint Procedures

Any person who believes that he or she has been discriminated against on the basis of race, color, or national origin by the city of Phoenix may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. All Title VI complaints are processed regionally under the Valley Metro Customer Assistance System (CAS) and forwarded to the applicable administrator of the service. The city of Phoenix investigates complaints received no more than 180 days after the alleged incident. The city will process complaints that are complete.

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, the city of Phoenix and 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 the city of Phoenix. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

The city of Phoenix has 30 days to investigate each complaint. If more information is needed to resolve the case, the city may contact the complainant. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the city can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

Following the investigation of the complaint, one of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to the city of Phoenix.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

For more information on the city of Phoenix's Civil Rights Program and the procedures by which to file a complaint, contact the Title VI coordinator at (602) 262-7242.

Filing Complaints

The city of Phoenix utilizes the Valley Metro Customer Assistance System (CAS) to capture all complaints received regionally. Valley Metro Customer Service is your point of contact and any such complaints filed within 180 days will be forwarded to the applicable administrator.

How to File a Complaint

To file a complaint directly with the city of Phoenix via mail, please address the correspondence to:

Attention: Title VI Coordinator
City of Phoenix Public Transit Department

Section 2: General Reporting Requirements

302 N. 1st Avenue, Suite 900
Phoenix, AZ 85003

Or, a Title VI complaint form can be found online at:
www.phoenix.gov/publictransit

To file a complaint directly with Valley Metro, find the complaint form online at:

www.valleymetro.org/form/title-vi-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

Other options to file a complaint include:
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

Customer Service

Complaints received by Valley Metro Customer Service will be assigned to a 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.

Requesting Information

To request information in alternative formats, please contact the city of Phoenix at (602) 534-3026 or Valley Metro Customer Service at csr@valleymetro.org or phone: (602) 253-5000, TTY: (602) 251-2039.

TRACKING

As a complaint is received, it is logged into the CAS system. Within 24 hours of logging the complaint, Valley Metro Customer Service administrator sends the complaint to the cities/transit provider for investigation and documentation.

Once reviewed, the 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 process includes an audit process of all completed Title VI complaints. Should an inaccuracy be found, the administrator works with Customer Service to reopen the complaint and sends it 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:

Who? What? When? Where? How?

Add new issues that surface during investigation. The final list of issues becomes the investigation outline.

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.

Section 2: General Reporting Requirements

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 a list of all regulations, rules, policies and procedures that apply to the investigation:

- Title VI requirements
- Company (operator) 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 regulation, rules, etc.
- Make decisions 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
- Includes 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”**
- *Documented information should always include initials and dates*

2.4 Title VI Complaint Forms

Title VI complaint forms can be filled out online either with the city of Phoenix, or Valley Metro.

The city of Phoenix online form can be accessed via the Public Transit Department’s website at:

Phoenix.gov/publictransit.

Valley Metro’s online form can be accessed at:

www.valleymetro.org/form/title-vi-complaint-form

In addition, forms can be downloaded in a pdf format from Valley Metro’s website.

(see samples in [English](#) and [Spanish](#) on the next page).

Section 2: General Reporting Requirements

2.4 Title VI Complaint Forms

TITLE VI COMPLAINT FORM

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

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

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

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

Signature _____ Date _____

602.253.5000
TTY: 602.251.2039
valleymetro.org



FORMA DE QUEJAS DEL TITULO VI

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

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

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

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

Firma _____ Fecha _____

valleymetro.org
602.253.5000
TTY: 602.251.2039



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2.5 Title VI Investigations, Complaints and Lawsuits

Investigations

There were no Title VI investigations during the reporting period.

Lawsuits

One lawsuit was filed against city of Phoenix/Valley Metro, Title VI Program alleging discrimination, was dismissed by the Office of the Arizona Attorney General, Civil Litigation Division (Nicholas G. McGuire v. Valley Metro, filed 5/15/17, dismissed, dismissal affirmed on 2/6/18.

Complaints

Complaints submitted into the Customer Assistance System were received, investigated and resolved by the cities and or transit provider responsible. Each cities administrator audits the complaints as well as ensure they meet the guidelines for Title VI. Table 2 lists complaints received during the reporting period.

2.5.1 Table 2: Title VI Complaints

For Routes Operated by the city of Phoenix November 2015 to June 2018

Complaint #	Incident	Subcategory	Complaint	Action Taken
283496	12/13/14	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
279915	11/3/15	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
280372	11/6/15	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
281791	11/23/15	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
283505	12/23/15	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issued addressed with operator per company policy.
284853	1/4/16	Discrimination	Forced off/ Security	No conclusive evidence found to indicate violation had occurred. No action to be taken.
285044	1/6/16	Discrimination	Fare Policy	Video was reviewed for possible violation; no conclusive evidence of discrimination found. Operator followed fare policy. No action to be taken.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
286112	1/23/16	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Operations manager addressed issue with operator per company policy.
286328	1/26/16	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
287567	2/8/16	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
287505	2/8/16	Discrimination	Pass Up	Per information provided by customer and investigation conducted, no evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
287722	2/10/16	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. No action to be taken.
289708	3/2/16	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation.
289806	3/3/16	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
289817	3/3/16	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
290794	3/15/16	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Incident location is not a valid bus stop.
291088	3/17/16	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
294873	4/27/16	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
296203	5/11/16	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action to be taken.
296348	5/12/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
296333	5/12/16	Discrimination	Attitude (operator)	Issued addressed with operator per company policy.
297004	5/20/16	Discrimination	Fare Policy	Video was reviewed for possible violation; no conclusive evidence of discrimination found. Operator followed fare policy. No action to be taken.
297265	5/23/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. ADA Ramp deployed manually, work order established, vehicle left out of service. Operator to be monitored.
298791	6/10/16	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
299440	6/18/16	Discrimination	Fare Policy	Video was reviewed, no evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
300585	7/1/16	Discrimination	Fare Policy	Video was reviewed, no evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
300671	7/2/16	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Operator states he asks all customers to dispose of drinks in non-approved containers. No action was taken.
300754	7/4/16	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
301451	7/13/16	Discrimination	Forced off/Security	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
302151	7/21/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
302510	7/25/16	Discrimination	Fare Policy	Video was reviewed, no evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
303835	8/8/16	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
304786	8/18/16	Discrimination	Pass Up	Video was reviewed for possible violations; with no conclusive evidence of discrimination found. No customers were on the bus or at the stop at the time given by customer. No action could be taken.
305128	8/22/16	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
305526	8/25/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
305594	8/26/16	Discrimination	Policy (operator)	Operator to be monitored.
305736	8/28/16	Discrimination	Attitude (operator)	Operator to be monitored.
305883	8/30/16	Discrimination	Policy (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
306252	9/2/16	Discrimination	Fare Policy	Video was reviewed, no evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
306105	9/7/16	Discrimination	Fare Policy	Issued addressed with operator per company policy. Operator to be coached and counseled.
306590	9/7/16	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
306694	9/8/16	Discrimination	Forced off/Security	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
306940	9/11/16	Discrimination	Forced off/Security	Video was reviewed and no evidence of discrimination could be found. No action to be taken.
307059	9/12/16	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. Customer was not at the stop or prepared to board. No action could be taken.
307900	9/20/16	Discrimination	Fare Policy	Complaint forwarded to supervisor to be addressed with operator per company policy.
308053	9/22/16	Discrimination	Forced off/Security	Video was reviewed, no evidence of discrimination could be determined based on investigation. Issued addressed with operator per company policy.
308285	9/26/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
308838	10/2/16	Discrimination	Fare Policy	Operator to be monitored.
313364	11/17/16	Discrimination	Fare Policy	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
315259	12/9/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
315607	12/13/16	Discrimination	Fare Policy	Operator to be monitored.
316273	12/21/16	Discrimination	Policy (operator)	Operator to be monitored, coached and counseled.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
316341	12/22/16	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
316720	12/28/16	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
318838	1/24/17	Discrimination	Policy (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
320650	2/10/17	Discrimination	Fare Policy	No conclusive evidence found to indicate a policy violation had occurred.
321189	2/16/17	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. No action to be taken.
321286	2/17/17	Discrimination	Attitude (operator)	Per information provided by customer and investigation conducted, no evidence of discrimination could be determined based on investigation. Operator to be monitored.
321674	2/22/17	Discrimination	Pass Up	Per information provided by customer and investigation conducted, no evidence of discrimination could be determined based on investigation.
322665	3/3/17	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found. No action to be taken.
325770	4/6/17	Discrimination	Attitude (operator)	No conclusive evidence found to indicate a policy violation had occurred.
326301	4/12/17	Discrimination	Fare Policy	Video was reviewed for possible violation; no conclusive evidence of discrimination found. Fare box was not operational at the time. No action to be taken.
326701	4/17/17	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found. False Report.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
327662	4/27/17	Discrimination	Pass Up	No conclusive evidence found to indicate a policy violation had occurred.
329535	5/17/17	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
329641	5/18/17	Discrimination	Fare Policy	No conclusive evidence found to indicate a policy violation had occurred. The investigation is unsubstantiated due to insufficient information.
329742	5/19/17	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
330535	5/30/17	Discrimination	Policy (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
331888	6/13/17	Discrimination	Policy (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
332286	6/19/17	Discrimination	Policy (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
334220	7/7/17	Discrimination	Policy (operator)	No conclusive evidence found to indicate a policy violation had occurred.
334615	7/11/17	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
334499	7/11/17	Discrimination	Pass Up	No conclusive evidence found to indicate a policy violation had occurred. The investigation is unsubstantiated due to insufficient information.
334906	7/14/17	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
338451	8/17/17	Discrimination	Fare Policy	Operator to be monitored, coached and counseled.
341281	9/17/17	Discrimination	Fare Policy	No conclusive evidence found to indicate a policy violation had occurred.
341570	9/18/17	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.

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For Routes Operated by the city of Phoenix November 2015 to June 2018 (continued)

Complaint #	Incident Date	Subcategory	Complaint	Action Taken
343506	10/5/17	Discrimination	Attitude (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
344322	10/13/17	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
344911	10/19/17	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
348450	11/18/17	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
352546	1/4/18	Discrimination	Policy (operator)	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
353931	1/18/18	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found.
359293	3/9/18	Discrimination	Attitude (operator)	Operator to be monitor.
359935	3/16/18	Discrimination	Pass Up	Complaint forwarded to supervisor to be addressed with operator per company policy. Operator to be disciplined.
364867	5/4/18	Discrimination	Fare Policy	Video was reviewed, no evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action to be taken.
365868	5/14/18	Discrimination	Pass Up	Video was reviewed for possible violation; no conclusive evidence of discrimination found.

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2.6 Public Participation Plan

Overview

Under 49 USC Chapter 53, Section 5307, The Federal Transit Administration (FTA) requires “a locally developed process to consider public comment before raising a fare or carrying out major reduction in transportation service”. The public is provided the opportunity for input and review through the public engagement process. Public transit services provided by the city of Phoenix and the Regional Public Transit Authority (RPTA) operates under the brand name “Valley Metro”. As a result, much of Phoenix’s public participation, engagement, and feedback process are carried out in partnership with Valley Metro. Actions such as the establishment of new service, fare adjustments, major modifications of existing service, and or suspension or abandonment of any bus routes include a formal process of review by the city of Phoenix and meaningful public engagement conducted by city of Phoenix and Valley Metro staff.

In proposing service or fare changes in the region, the city of Phoenix and Valley Metro use a broad range of communication tools to solicit feedback from the community and targeted populations. The following list is not intended to be a complete list of communication tools which may be used, but a sample of some strategies that the city of Phoenix may use for a variety of purposes.

Table 3: Public Outreach Tools

Outreach Tool	Definition
Public Hearing	A meeting during which a presentation is made on the proposal and public testimony are heard and recorded.
Legal Notice	Public posting or advertising in newspapers to announce a legal action or intent.
Display Ads in Newspaper	Paid advertisement in the newspaper to alert readers about an upcoming event or action.
Website/Online Social Media	Information on the proposed changes are posted on both city of Phoenix and Valley Metro websites and social media to notify affected customers.
Mobile Device Alerts	Messages alerting customers to important information on the proposed changes.
Signs	Signs on buses, at stop locations, and at transit centers can help to reach people who use transit services.
Rider Alerts	Notification of route, frequency, or other information that is of particular interest to riders.
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input.
Workshops/Open Houses	Types of meetings where staff and public interact and discuss various issues.
Surveys	Surveying opinions and ideas can help public agencies understand how to better serve the constituency.
On-board Information	Pamphlets and posters inside the bus that alert riders to information or meeting dates.
Displays at Transit Centers	Permanent or temporary displays at transit centers are able to reach a large number of riders.
Webinar	An online interactive session of which a presentation is made and participants can ask the host questions on the proposed changes.

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Typical Public Participation Process for city of Phoenix Operated Service Changes

City of Phoenix and member cities of Valley Metro conduct changes to public transit service every six months. The public participation and outreach process begins six months before the effective service change date. The following list illustrates a typical public participation process:

1. List of proposed changes are finalized between city of Phoenix and Valley Metro staff. Maps and description of the proposed changes are prepared for public notice production and to be posted on the website six months before the service change date.
2. A presentation is made to the city of Phoenix Citizens Transportation Commission to notify commission members of the proposed changes.
3. Notice of public hearing date and place are posted on newspaper, website, and social media 30 days before the public hearing date. The second notice will be made at least 10 days prior to the scheduled hearing date. Public materials will be produced in English and Spanish (the region's two primary languages), or in other languages upon request, in order to ensure Limited English Proficient (LEP) populations within the transit service area are informed of the proposed changes.
4. Targeted outreach (which includes in person contact or posters) and conducted to notify customers of the proposed changes.
5. Announcements are made inside public transit vehicles to notify passengers the proposed changes.
6. Webinar is conducted about one week before the public hearing date to present the changes and answer any questions.
7. Public hearing is held in coordination between city of Phoenix and Valley Metro at Valley Metro building. Presentation are made and public testimony are heard and recorded.
8. Results of the public outreach process is presented to the city of Phoenix Citizens Transportation Commission and request the commission to recommend approval of the proposed changes. Public may provide comments during

the meeting.

9. Presentation is made to the city of Phoenix Transportation and Infrastructure Subcommittee to request approval of the proposed changes. Public may provide comments during the subcommittee meeting.



Public Outreach Techniques for Title VI Populations

These outreach strategies are based on techniques utilized as a collaborated effort with Valley Metro as indicated in **Attachment A: Valley Metro's Public Participation Plan**. The city of Phoenix partners with Valley Metro when conducting joint-planning studies on regional transportation planning efforts. The public participation strategies listed below are used by the city of Phoenix as part of the public outreach process for these plans and studies. The techniques below pertain to Title VI populations (minority, LEP, low-income).

Techniques to Involve Low Income Communities and Minority Communities

- Focus Groups
- Include information with meeting notices on how to request translation assistance
- Extensive use of visualization techniques, including maps and graphics
- Conduct an ongoing dialogue with groups representing potentially underserved populations such as the elderly, youth, and non-native English speakers
- Notify agencies that work with minorities and low-income populations of agency activities
- When multiple meetings are held for a single

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subject, efforts are made to use a diversity of meeting locations in an effort to reach all segments of affected populations

- Press releases are distributed to local media outlets to inform the public of meetings, open houses, and other city of Phoenix activities

Techniques to Involve Limited English Proficient Population:

- Translate outreach materials and have translators available at meetings as requested
- Include information on website and meeting notices on how to request translation or other assistance
- Use visualization techniques such as maps and graphics to illustrate trends, proposed projects, etc.



Section 2.7 Language Assistance Plan

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

Language Assistance Needs Assessment – Four Factor Analysis

The following outlines how to identify a person who may require language assistance, the ways in which the city of Phoenix Public Transit Department and the regional transit authority, Valley

Metro, provides such assistance, any staff training that may be required to provide such services, and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis.

The four factors are:

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

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

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

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

The following is an explanation of what is to be included in the four factor LEP population needs assessment. In addition to the following explanation, Valley Metro has conducted a thorough LEP four factor analysis and resulting Language Access Plan to be utilized by all Valley Metro member agencies.

Please refer to **Attachment B: Valley Metro Language Assistance Plan.**

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

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

Demographic Profiles for Communities of Concern

Communities of concern describe populations that have been determined by the federal government as benefiting from protections to ensure their meaningful involvement in planning and services.

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

To assist with the identification of Title VI neighborhoods, the presence of Title VI populations is compared against the Maricopa County average for each community of concern. Linguistic isolation follows federal guidance at five percent within a census block of 1,000 people or more within a neighborhood. Based on the 2008 to 2012 American Community Survey five-year estimates, the threshold for each mandated community of concern is as follows:

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

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

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

The Valley Metro Planning and Community Rela-

tions Divisions have conducted a thorough analysis of the frequency with which LEP persons come into contact with the Valley Metro system through a combination of surveys to community groups serving this population, as well as demographic mapping of service crossing census tracts with greater than average concentration of minority, low income and LEP populations. Please refer to the in-depth LEP analysis conducted by Valley Metro in ***Attachment B: Valley Metro Limited English Proficiency Four Factor Analysis and Language Access Plan.***

Factor 3: The nature and importance of the city of Phoenix Public Transit Department services and programs in people’s lives.

An analysis of benefits and burdens is a critical component of the city of Phoenix Public Transit Department’s Title VI Program. The Valley Metro Community Relations Department, in partnership with the city of Phoenix Public Transit Department, analyzes the feedback reported by communities of concern to determine the potential benefits and burdens of a transportation service or fare change on the population. In addition, proposed transportation improvements, such as those in the city of Phoenix Public Transit Department System Plan, are analyzed and documented to determine if the improvements impose a disproportionate burden



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on the communities of concern. This analysis, as well as the input from communities of concern, is incorporated as proposed service and fare changes advance through the Valley Metro and city of Phoenix committee, board and council processes for approval. Feedback from Title VI populations will be used to assess any enhancements to the Title VI Plan on a biennial basis.

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

Valley Metro conducts public outreach activities on behalf of its members for regional transit service changes. The resources that Valley Metro uses to conduct LEP outreach are highlighted in **Attachment B: Valley Metro Limited English Proficiency Four Factor Analysis and Language Access Plan**.

The city of Phoenix Public Transit Department conducts additional outreach for department-specific transit activities, to include its 35 year comprehensive transit plan.

Resources to translate materials and interpret for individuals are available but finite. The investment is made to translate vital materials, and the city of Phoenix Public Transit Department maintains a standing offer to translate other materials into additional languages and provide alternative formats such as Braille or large print. The city of Phoenix Public Transit Department utilizes the city of Phoenix Library Braille equipment to aid in the provision of these services and frequently enlists internal resources and staff who are bilingual and

available to assist with language interpretation. At a minimum, there is a bilingual staff member who can assist with interpretation at public meetings as needed.

Additional materials and interpreters will be made available for areas with high concentrations of linguistically-isolated individuals. The city of Phoenix Public Transit Department public involvement staff has been trained to utilize bilingual staff when needing translation assistance. If fluency in the needed language is not found among the city of Phoenix Public Transit Department staff, assistance may be acquired through contracted services. Currently, the Spanish population has a significant presence in the service area; therefore, a number of materials are created and translated in a format that is easily understood by this Spanish speaking population. The city of Phoenix Public Transit Department also offers language translation services for public meetings at no cost to the public, if the request is made 48 hours prior to the time of the scheduled meetings.

Collateral materials are created and translated for outreach and marketing purposes to include:

- Printed materials
- News releases to local television, radio and print media
- Public notices, service explanations
- Spanish interpreters at public meetings
- Social media strategies and online technologies to reach affected population

Analysis of Benefits and Burdens - Implementation of the Language Assistance Plan

Information gained from Valley Metro's detailed analysis of affected communities will be considered when conducting planning activities.

Based on the data, staff will determine the presence of Title VI and affected communities as well as the potential to impact them through the planned activity or project. Appropriate outreach and analysis will be incorporated into all relevant activities from the beginning. The Title VI Coordinator may assist staff as needed in determining the potential impact of projects and planning activities on Title VI populations. The Coordinator will also provide training opportunities to ensure staff develops an understanding of Title VI issues and responsibilities.

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The city of Phoenix Public Transit Department must analyze any major decision made regarding the City's transit system, particularly if there is any potential to negatively affect areas of high concentration of LEP population. Some of the on-going LAP implementation strategies include:

- Identifying the LEP individuals who need language assistance
- Implementing city of Phoenix and Valley Metro language assistance measures
- Providing staff training
- Ongoing implementation of public involvement program and activities
- Monitoring and updating the LAP

Identifying the LEP Individuals Who Need Language Assistance:

The city of Phoenix Public Transit Department will continue to monitor the language needs of the LEP individuals within its service area and will continue to do the following:

- Continue to monitor the languages and the customers' needs encountered by the front-line staff.
- Continue to monitor the American Community Survey One-Year Estimate published each year by the U.S. Census Bureau for changes in the LEP population.
- Closely monitor the Census data and ensure that the LAP is updated in a timely manner.

Language Assistance Measures:

The city of Phoenix Public Transit Department will continue to implement the current measures to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:

- Continue to provide for interpreters as needed, in Spanish and any other language requested in accordance with Title VI guidelines.
- Maintain regular communication with front line public involvement staff regarding their experience with the LEP clients in order to assess the assistance provided.
- Continue to translate important notices and major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population.
- Continue to work with local social services agen-

cies to disseminate information to the LEP population and to collect information regarding the unmet needs.

Staff Training:

The city of Phoenix Public Transit Title VI Coordinator will ensure that staff is provided appropriate training in order to provide high level of customer service to the general population as well as the LEP population.



All involved staff will be regularly trained for handling potential Title VI and LEP complaints.

Staff with bilingual capabilities will be given special training related to language assistance and how to handle potential Title VI and LEP complaints.

The Public Transit Department Title VI Coordinator will continue to survey staff for their language skills.

Public Involvement:

The city of Phoenix Public Transit Department will continue to participate in Valley Metro's inclusive public outreach process as detailed in the Valley Metro's Title VI Public Participation Plan (**Attachment A: Public Participation Plan**).

The Department's Title VI Coordinator will also continue to monitor the effectiveness of the current process by participating in a sampling of Valley Metro and city of Phoenix Public Transit-sponsored public outreach events.

The city of Phoenix Public Transit Department Title VI Coordinator will also work with Valley Metro to update the Public Participation Plan as needed.

In collaboration with Valley Metro, The city of Phoenix Public Transit Department's Title VI Coor-

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dinator will continue to explore new and innovative techniques and strategies to engage the public in transportation projects and planning.

Monitoring and Updating the LAP:

The city of Phoenix Public Transit Department will work with Valley Metro to continue to update the LAP as required by the USDOT and as the characteristics of the population changes. Updates will be made as necessary and may include, but not be limited to:

- Changes in LEP population by number or area as new information is made available.
- Updated analysis of the current LEP service area.
- Requirements for additional language translation services.

Notice to LEP Persons:

Any person requesting language assistance should contact the city of Phoenix Public Transit Department. All correspondence should be addressed to:

ATTN: Title VI /ADA Coordinator

City of Phoenix Public Transit Department
 302 N. First Ave., Ste. 900
 Phoenix, AZ 85003
 (602) 262-7242 (phone)
 (602) 495-2002 (fax)
 pubtrans@phoenix.gov
 www.phoenix.gov/publictransit

2.8 Membership of Non-Elected Committees and Councils

Title VI issues are communicated and considered as project and service planning activities move through the city of Phoenix Public Transit Department and Valley Metro board approval process.

This generally originates at the planning staff technical level, proceeds through Division and Management level review and recommendation, and is then submitted to the Valley Metro Service Planning Working Group made up of all Valley Metro member cities. After the service changes are refined through the working group, they are presented to the public for input and revision. The Service Planning Working Group meets to discuss public input and to make final changes, then city of Phoenix staff submit the final service change recommendations to the Phoenix City Council for final approval or disapproval. In this way, the concerns and community input that have been addressed throughout the planning of the activity and project development impact decisions in a meaningful way.

Within the Title VI Circular (FTA 4702.1B), FTA requires that the city of Phoenix include a table depicting the racial distribution of the members of all its non-elected committees and councils.

Advisory Committees: These groups may include departmental representatives, liaisons from MAG, jurisdictional agencies (cities/towns) and other stakeholders as appropriate to the specific project or planning effort.

General Public: This group includes residents throughout the city of Phoenix. This target group is included through Public Open Houses, social media, and other methods identified by both the city of Phoenix Public Transit Department Public Information Office and Valley Metro Community Relations Department.

Boards and Commissions— Citizen’s Transportation Commission (CTC):

The Citizen’s Transit Commission (CTC) consists of fifteen (15) members. Each member shall be a resi-

Table 4: Non-Elected Transit Related Committees by Race

Body	Caucasian	Latino	African American	Asian American	Native American	Non-Disclosed
Citizen’s Transportation Commission	7	3	1	0	0	4
Percentage	47%	20%	6%	0	0	27%

Section 2: General Reporting Requirements

dent of the city of Phoenix. Commission members shall be appointed from the following: (a) One (1) from each council district; (b) One (1) from the business community; (c) One (1) from the tourism and hospitality industry; (d) One (1) from the community of persons with disabilities; and, (e) Four (4) from the city at large.

To ensure accountability, the CTC as required by the Transportation 2050 Plan, assures public input and government accountability on all transit and city traffic improvements that are made with funding provided pursuant to the measure.

Another important function of the CTC is to assist in developing and maintaining public understanding and support of the city of Phoenix Public Transit Department programs through active communication. CTC members bring the constituent voice to the city of Phoenix Public Transit Department transportation decisions, and CTC actions go to the Transportation and Infrastructure Subcommittee of the Phoenix City Council. The board meets every



month, and city of Phoenix residents are encouraged to attend.

Transportation and Infrastructure Subcommittee:

The Transportation and Infrastructure subcommittee provides policy guidance on issues related to: streets; transportation planning; public transit, light rail, walkability and bikeability, infrastructure planning; water; wastewater; and solid waste. Subcommittee membership is comprised of city elected officials who are selected by the Mayor in January to serve on the various subcommittees for the calendar year.

The city of Phoenix Mayor and city Council: The City

is administered by a city Manager who reports to the Mayor and eight city council members elected by the public. The Mayor and city Council receives final



drafts of key policies, procedures, plans and programs for adoption.

2.9 Determination of Site or Location of Facilities

Since the last Title VI Program submission in 2015, The city of Phoenix Public Transit Department built one facility, the Desert Sky Transit Center, meeting the applicable definitions under Title VI, and thereby conducted an analysis. Please refer to **Attachment C: Desert Sky Facility Site Equity Analysis.**

In determining the site or location of facilities, the City will not make selections with the purpose or effect of excluding persons from, or denying benefits of, or subjecting them to discrimination with regard to race, color or national origin following the guidance provided in the Circular 4702.1B, Chapter III, Section 13 – Determination of Site or Location of Facilities.

The Desert Sky Transit Center is located at the southeast corner of Thomas Road and 79th Avenue in west Phoenix. The purpose of constructing a new Desert Sky Transit Center was in result of the current Desert Sky Mall property owner(s) would not renew the lease thus the City purchased adjacent property to support the City's efforts in revitalizing the community in west Phoenix. The project received a Categorical Exclusion under 23 CFR 771.117(d)(10). Please refer to **Attachment D: Desert Sky NEPA approval.**

- For facilities covered by this provision, The city of Phoenix is required to:

Section 2: General Reporting Requirements

- Complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the 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.
- When evaluating locations of facilities, recipients should 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 where appropriate to ensure that proper perspective is given to localized impacts.
- If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, The city of Phoenix must consider and analyze reasonable, feasible, and prudent 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.

2.10 Phoenix City Council – Public Transit 2018 Title VI Program Update

The city of Phoenix City Council received their September 2018 agenda, which included item 93, titled: Approval of Federal Transit Administration Required 2018 Title VI Program Update. During the meeting the Council discussed and moved to approve the item. Please refer to Attachment J: Resolution No. TBD Title: TBD

Section 3: Subrecipient Monitoring



3.1 Program Overview

Guidance for Recipients of Federal Funding

Title VI of the Civil Rights Act of 1964 is the overarching civil rights law that prohibits discrimination based on race, color, or national origin, in any program, service or activity that receives federal assistance. Specifically, Title VI assures 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 benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.”

As the primary recipient of funding from the Federal Transit Administration (FTA), the city of Phoenix Public Transit Department follows the guidance of FTA Circular 4702.1B, which provides the instructions necessary to carry out the USDOT Title VI regulations, and to integrate into our programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

To provide subrecipients of federal funds assistance and information to ensure continued compliance with all grant requirements, the city of Phoenix conducts three levels of subrecipient monitoring: project oversight, assessments and ongoing assistance.

Project Oversight

The city of Phoenix’s subrecipient monitoring procedures outlines programmatic and fiscal responsibilities of various roles to ensure subrecipients are complying with federal requirements and are using fed-

eral funds appropriately. Oversight begins after grant applications are awarded by the federal agency and a specific ledger is tracked by the grants administrators.

Assessment

Program staff performs audit assessments of subrecipients by conducting annual compliance reviews, which includes reviewing external annual audits, monthly/quarterly performance reports and Title VI plans and other documents. If results of the assessment identify known or potential concerns, the Phoenix Public Transit Department may conduct additional procedures such as testing payments, site audits to gain an understanding of internal controls and ensuring federal requirements are met such as procurement, equipment purchases and suspension and debarment when applicable.



Ongoing Assistance

The Title VI Coordinator and/or Grant Administrator provide ongoing assistance to subrecipients through communications, trainings (when requested), and access to subject matter experts within the city of Phoenix for information and data.

3.2 Steps to Providing Assistance

The oversight team is ultimately responsible for the achievement of subrecipient outcomes, and is involved in every step of the process by ensuring appropriate agreements are in place, agreements contain the required federal, state and local language and verifying that performance measures and all compliance requirements are met throughout the grant period.

Program staff will provide ongoing assistance to subrecipients through communications, training (when

Section 3: Subrecipient Monitoring

requested), and access to subject matter experts within the city of Phoenix for information and data. Specifically, the city of Phoenix has provided the following to subrecipients:

- Sample notices to the public informing beneficiaries of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint, and the recipient’s Title VI complaint forms;
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient; and
- Demographic data to update their Title VI public participation and language assistance plans.

3.3 Steps to Ensure Title VI Subrecipients Monitoring

The Title VI review process focuses on, but is not limited to and shall at a minimum include the following information:

The items listed below are based on requirements from 4702.1B. Please refer to *Attachment E: Compliance Monitoring Checklist*.

Title VI Program Content Requirements for all Subrecipients

- A signed Title VI assurance and governing body approval of the overall Title VI Program
- A copy of the agency’s public notice with a list of where the notice is posted
- Instructions for how to file a complaint with a copy of the complaint form
- A list of any Title VI investigations, complaints or lawsuits and how such complaints were addressed and resolved by the city of Phoenix Public Transit Department
- A Public Participation Plan and list of outreach activities conducted since the last submission
- A Language Assistance Plan for providing language assistance
- A table depicting the racial composition of transportation-related committees, boards, and advisory councils

If constructing a facility, the Title VI Program must include:

- Title VI Facility Location Equity Analysis

If providing fixed route service, the Title VI Program must also include:

- Fixed Route Service Standards
- Fixed Route Service Policies

City of Phoenix responsibilities

As the designated recipient of FTA funds, the city of Phoenix receives, administers and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. The city of Phoenix’s responsibilities includes monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents, including subrecipient Title VI data to FTA and providing assistance and support to subrecipients.

To Track Title VI compliance, the city of phoenix will:

(Please refer to attachment E.1 (on page 33) Subrecipient Monitoring Compliance Review)

- Document subrecipient compliance with the general requirements
- Collect and maintain subrecipient Title VI program documents on a designated schedule
- Perform desk and onsite compliance reviews on selected subrecipients
- Forward subrecipient Title VI information as requested by the FTA

Annual Title VI report

Each year subrecipients must submit the following the city of Phoenix by December 1 of each year.

- A list of transit-related Title VI complaints, investigations and lawsuits
- Public Participation Plan
- Title VI facility location equity analysis (if constructing a facility)

Nonprofits

Subrecipients that provide demand response services, that receive 5310 funds solely to serve their own clientele (i.e. closed door service) are only required to submit a Title VI Program and annual Title VI Report by October 15 of each year.

The table below reflects subrecipients awarded FTA section 5307, 5309, 5316, 5317, 5337, 5339 & 5310 funds

Attachment E.1 - Subrecipient Monitoring Compliance Review

Title VI

All Sections 5307, Section 5309, Section 5337, Section 5339, Section 5310, Section 5316, and Section 5317 grantees must ensure that no person in the United States, on the grounds of race, color, national origin be excluded from participating in, denied the benefit of, or be subject to discrimination under any project, program or activity funded in whole or in part through these section grants. Subrecipients that receive federal funds are required to comply with Title VI laws and regulations, including FTA Circular 4702.1B which requires subrecipients to submit the following information:

Requirement	Results
<p>1. Determine if the subrecipient has a Title VI plan and Verify the following elements or FTA approval:</p> <div style="border: 1px solid black; padding: 5px;"> <p>A. Title VI Assurance</p> <p>B. Public Notice</p> <p>C. Customer compliant Form</p> <p style="padding-left: 20px;">English</p> <p style="padding-left: 20px;">Spanish</p> <p>D. List of all transit related Title VI compliants</p> <p style="padding-left: 20px;">Compliants</p> <p style="padding-left: 20px;">Investigations</p> <p style="padding-left: 20px;">Lawsuits</p> <p>E. Public Participation Plan</p> <p>F. Language Assistance Plan</p> <p>G. Transit related committee membership table</p> <p>H. Board Approval</p> </div> <p>If applicable,</p> <div style="border: 1px solid black; padding: 5px;"> <p>I. Title VI Equity Analysis</p> <p>J. Service Standards for fixed route</p> <p>K. Service Policies for fixed route</p> </div>	

Section 3: Subrecipient Monitoring

3.4 Table 3 - List of city of Phoenix Subrecipients

Subrecipient	Agency Type
Avondale	Public
Buckeye	Public
Chandler	Public
El Mirage	Public
Glendale	Public
Gilbert	Public
Goodyear	Public
Mesa	Public
Peoria	Public
Scottsdale	Public
Surprise	Public
Tempe	Public
Tolleson	Public
Valley Metro	Public
Arizona Recreation Center for the Handicapped	Nonprofit
Arizona United Spinal Cord Injury Association	Nonprofit
Beatitudes	Nonprofit
Benevilla	Nonprofit
Central AZ Council on Development Disabilities	Nonprofit
Chandler Gilbert ARC	Nonprofit
Cheers	Nonprofit
Civitan	Nonprofit
Developmental Enrichment Centers	Nonprofit
East Valley Adult Resources	Nonprofit
Foothills Caring Corps	Nonprofit
Friendship Village	Nonprofit
Goldensun Peace Ministries	Nonprofit
Gompers	Nonprofit
Hacienda Healthcare	Nonprofit
Horizon Health and Wellness	Nonprofit
Independence Plus	Nonprofit
Lifewell Behavioral Wellness	Nonprofit
Lura Turner Homes	Nonprofit
Marc Community Resources	Nonprofit
Native American Connections	Nonprofit
NAU	Nonprofit
Northwest Valley Connect	Nonprofit
One Step Beyond	Nonprofit

Section 3: Subrecipient Monitoring

3.4 Table 3 - List of city of Phoenix Subrecipients (cont.)

Subrecipient	Agency Type
Scottsdale Training and Rehabilitation Services	Nonprofit
Southern AZ Association for Visually Impaired	Nonprofit
Stand Together and Recover	Nonprofit
The Centers for Habilitation	Nonprofit
Terros	Nonprofit
United Cerebral Palsy Association of Central Arizona, Inc.	Nonprofit
UMOM	Nonprofit
Valley Life	Nonprofit
Valley Center for the Deaf dba Catholic Community Services of Southern AZ	Nonprofit
AMC Technologies	Nonprofit
Tanner Community Development Corporation	Nonprofit
Ability 360	Nonprofit
ACCEL	Nonprofit
Ahwatukee Foothills Family YMCA	Nonprofit
Arizona Foundation for the Handicapped	Nonprofit
Hope Lives – Vive La Esperanza	Nonprofit
Nobody's Perfect	Nonprofit
Tempe Neighbors Helping Neighbors	Nonprofit
Treasure House	Nonprofit

Section 3: Subrecipient Monitoring

Public Organizations:



Non-profit Organizations:

Ability 360	ACCEL	Ahwatukee Foothills Family YMCA	AMC Technologies
Arizona Recreation Center for the Handicapped	Arizona United Spinal Cord Injury Association	Beatitudes	Benevilla
Central AZ Council on Development Disabilities	Chandler Gilbert ARC	Cheers	Civitan
Developmental Enrichment Centers	East Valley Adult Resources	Foothills Caring Corps	Friendship Village
Goldensun Peace Ministries	Gompers	Hacienda Healthcare	Hope Lives – Vive La Esperanza
Horizon Health and Wellness	Independence Plus	Lifewell Behavioral Wellness	Lura Turner Homes
Marc Community Resources	Native American Connections	NAU	Nobody's Perfect
Northwest Valley Connect	One Step Beyond	Scottsdale Training and Rehabilitation Services	Southern AZ Association for Visually Impaired
Stand Together and Recover	Tanner Community Development Corporation	Tempe Neighbors Helping Neighbors	Terros
The Centers for Habilitation	Treasure House	UMOM	United Cerebral Palsy Association of Central Arizona, Inc.
Valley Center for the Deaf dba Catholic Community Services	Valley Life		

Section 4: System-Wide Service Standards and Policies

4.1 Overview

The city of Phoenix follows a multiple phase Transit Standards and Performance Measures (TSPM) guided by Valley Metro. These standards fall in line with federal and state requirements. The TSPM help manage our regionally funded transit services and investments to include bus stops, park-and-ride facilities and future light rail destinations. The following three phase approach is posted on Valley Metro's website².

Phase I

The first phase in the plan establishes service provision goals to guide the development of Valley Metro's TSPM. This phase established standardized transit service types, operating characterized for each service type and bus stop spacing standards.

Phase II

The second phase focuses on the development of transit service performance measures, transit service thresholds, application principles and implementation standards for new service.

Phase III

The third phase establishes standard and performance measures for regionally funded transit vehicles such as buses and light rail vehicles and transit facilities including bus stops and park-and-ride facilities.

Beyond these considerations, the city of Phoenix has also established standards and policies as set forward in FTA Circular 4702.1B covering:

- | | |
|-------------------|-----------------------------|
| Standards: | Vehicles Loads |
| | Service Frequency |
| | On-time Performance |
| | Service Availability |
| | Vehicle Assignment |
| | Transit Amenities |
| | Policies |

Please refer to Attachment F:
2018 Monitoring Report

These standard and policies assist in guiding the development and delivery of service in support of the City's mission to provide valued transit service. They also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any Disparate Impacts are evident.

4.2 Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into revenue service throughout the transit system. Vehicles will be assigned to the various depots such that the average age of the fleet serving each depot does not exceed 12 years or 500K miles. Low-floor buses are deployed on frequent service and other high-ridership routes, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and an automated stop announcement system.

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

² <https://www.valleymetro.org/transit-standards-and-performance-measures>

Section 4: System-Wide Service Standards and Policies

Service Policy Elements

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

Level of Service Assessment

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

Findings

The city of Phoenix Public Transit Department finds no disparities in terms of performance standards that would indicate lesser service provision to minority riders or populations. Vehicles serving minority routes are newer than those serving non-minority routes. Please refer to Attachment F: 2018 Monitoring Report.

4.3: Amenity Placement Guidelines

Transit Amenities refer to fixed items of comfort and convenience available to the general riding public such as shelter placement, lighting at the bus stop, signage, benches and trash can placement. Generally, individual municipalities are responsible for the provision, monitoring and maintenance of shelters, bus stop signs, benches and other amenities. The following sections briefly summarize the City's policies or standards that govern the deployment of amenities on the City's transit system. Phoenix policy is to review and ensure amenities are placed within the City without

regard to race, color, national origin, or income considerations.

The City of Phoenix residents passed a transportation initiative in August 2015. That initiative was a dedicated sales tax (0.7 of a cent on every dollar spent in Phoenix) for transportation. That include streets and transit. The initiative, called T2050, was effective in January 2016. Since that time, one of the T2050 goals is to achieve 100% shade coverage at each bus stop location within 10 years. That goal has an approximate cost of \$21M (today's dollars). The City currently owns approximately 4,000+ bus stops with nearly 63% of those have shaded structures as part of the bus stop features. The City of Phoenix also has a program that incorporates advertising kiosks in the bus stop shelter design at certain locations based on third-party advertising vendor determinations of market. Those advertising revenues paid to the City go back into the transit program.

General Bus Stop Placement and Amenity Considerations

- Understand the physical requirements of buses
 - Adequate curb space for ADA and mobility device ramp operations
 - Adequate sidewalk clearance for pedestrian and bicycle traffic on sidewalk
- Bus stops located by ¼-mile spacing
 - Mid-block stops are located near local street intersections for ease of crossing the street safely
 - Major arterial intersection bus stops are located far-side of the intersection for traffic flow purposes
 - Bus bays (or bus pullouts) are located far-side of the intersection based on available right-of-way and the number of lanes of traffic
 - Bus stops are located in higher visibility areas at locations that minimize safety hazards at driveways, visibility for adjacent properties, and facilitate the transfer to

Section 4: System-Wide Service Standards and Policies

cross routes.

- Bus stop amenities historically have been prioritized by ridership. Higher ridership bus stops will have shade structures and other amenities. With the T2050 initiative, the City is working toward the goal of all bus stops with shade shelters in the next 10 years.

- All bus stops and amenities must comply with the ADA compliance and accessibility requirements.
- Signage – All bus stops shall feature signs mounted in a uniform manner to identify the area as a stop and provide readable and accurate information.
- Benches – Ridership figures are used to determine seating requirements while the built environment often dictates seating options.
- Trash Can Placement – Trash cans are only placed at sheltered bus stops with high ridership.
- Bus stop placement, amenities and upgrades must consider ADA compliance and accessibility requirements.
- ADA considerations are a major factor in the City's bus stop maintenance program in working through pre-1990 bus stops to upgrade those stops to be accessible and compliant with the ADA.
- Recent trends in the increasing homeless population has made bus stops a common location for homeless encampments and general use. The City has strived to create a comfortable environment for transit users while addressing the homeless use of the bus stop in a compassionate manner.
- Related to the provision of bus stop amenities is every increasing occurrence of vandalism. Gang tagging, trash, damage to amenities, and the de-

stroying of lighting are common at our bus stops. The City has a dedicated cleaning, maintenance and repair program for all bus stops. A significant portion of that budget addresses the ongoing upkeep of the existing bus stops in order to maintain a certain level of security, comfort and cleanliness.



Bus Shelter Designs

City of Phoenix continues to use ridership as the primary criterion for determining shelter placement. Shelters should be provided at all stops which serve 50 or more boarding riders during the course of a typical weekday. A variety of bus shelter shapes and sizes are available to address site restrictions, opportunities, and ridership needs. The City recently embarked on two bus stop shelter design initiatives as part of the T2050 goal to have shade shelters at all bus stops:

- Upon passage of T2050, the City initiated a new bus stop shelter design to increase the size of the bus shelter to create more passenger room and to increase the shade. The new design has been incorporated in to the bus stop shelter manufacturing process and the new structures are currently on the street.
- As part of T2050, in order to create better shade in the hot environment of Phoenix, the City collaborated with Arizona State University, School of

Section 4: System-Wide Service Standards and Policies

Industrial Design, to develop a better bus stop shelter that created more opportunity for shade at all hours of the day while being an economically feasible product. The Industrial Design faculty and students assisted in the creation of a new concept that was approved by the City Council. That concept is currently being refined through the design process with prototypes being constructed prior to manufacturing at a larger scale. The goal for bus stop shade structures is to have multiple designs that can accommodate the many unique siting restrictions across the city. The flexible designs provide options for each unique location.

4.4 Regional System-Wide Service Standards and Policies



Overview

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

Regional Service Policies for Bus Service

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

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

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

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

1.2 Service Policy Elements

- Vehicle age

Section 4: System-Wide Service Standards and Policies

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

1.3 Level of Service Assessment

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

2.0 DISTRIBUTION OF TRANSIT AMENITIES

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

Regional Service Standards for Bus Service

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

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

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

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

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

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

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

Commuter Express/RAPID Service/Limited Stop Peak⁴

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

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

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

Community Circulator Service

The buses used for the circulators can, on average, seat 17 passengers and comfortably hold 23 passengers. The vehicle load threshold for all day service (such as the BUZZ, ZOOM, MARY, ALEX, SMART, DASH and Or-

Section 4: System-Wide Service Standards and Policies

bits) is expressed as a ratio of 1.35. This means that all seats are filled and there are 6 standees per bus. All buses providing this service are ADA accessible.

Rural Connector

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

1.2 Vehicle Load Data Collection

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

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

1.3 Vehicle Load Assessment

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

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

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

Commuter Express/RAPID Service/Limited Stop Peak

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

Community Circulator Service

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

Rural Connector

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

Section 4: System-Wide Service Standards and Policies

- Compare level of service between minority and non-minority routes and low income and non-low-income routes

2.0 VEHICLE HEADWAY

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

2.1 Vehicle Headway Standard

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

Table 6 – Vehicle Headway Standards

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

**60 min early morning and late night*

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

2.2 Vehicle Headway Data Collection

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

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

Commuter Express/RAPID Service/Limited Stop Peak

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

Circulator Service

- Measure standard using published circulator route service schedules

Rural Connector

Section 4: System-Wide Service Standards and Policies

- Measure standard using published Rural Connector service schedules

2.3 Vehicle Headway Assessment

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

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

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

3.2 On Time Performance Data Collection

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

3.3 On Time Performance Assessment

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

4.0 SERVICE AVAILABILITY

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

4.1 Service Availability Standard

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

Local Bus and Key Local Bus

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

Limited Stop Peak and Limited Stop All-Day

- Bus stops are placed approximately one mile apart. Where development patterns are of high-

Section 4: System-Wide Service Standards and Policies

er or lower density than typical within the region, an exception to the recommended stop spacing standard may be warranted

Express/RAPID Service

- Express/RAPID stops are strategically placed and are generally located at park-and-ride facilities
- No more than four inbound Express bus stops
- Outbound Express/RAPID stops behave more like a local service and will pick up or drop off passengers more frequently

Community Circulator Service

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

4.2 Service Availability Data Collection

- Bus stop database

4.3 Service Availability Assessment

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

Regional Service Policies for Light Rail Service

1.0 VEHICLE ASSIGNMENT

1.1 Service Policy

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

1.2 Service Assessment

Section 4: System-Wide Service Standards and Policies

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

2.0 DISTRIBUTION OF TRANSIT AMENITIES

2.1 Service Standard

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

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

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

2.2 Service Assessment:

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

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

Section 4: System-Wide Service Standards and Policies

1.0 VEHICLE LOAD

1.1 Vehicle Load Standard

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

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

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

1.2 Vehicle Load Data Collection

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

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

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

1.3 Vehicle Load Assessment

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

2.0 VEHICLE HEADWAY

2.1 Vehicle Headway Standard

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

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

Table 6 – Vehicle Headway Standards

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

2.2 Vehicle Headway Data Collection and Service Assessment

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

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

3.0 ON TIME PERFORMANCE

3.1 On Time Performance Standard

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

3.2 On Time Performance Data Collection and Assessment

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

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

Section 4: System-Wide Service Standards and Policies

4.0 SERVICE AVAILABILITY

4.1 Service Availability Standard

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

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

4.2 Service Availability Assessment

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

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

Section 5: Demographic Data and Maps

5.1 Demographic Data Overview

The city of Phoenix uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income and limited English proficient populations. Such data enables the city to monitor ongoing service performance, analyze the impacts of policies and programs on these populations and take appropriate measures to avoid or mitigate potential disparities. The maps and charts must be updated: 1) at least every three years, 2) after each Federal census data become available, and 3) when there are significant changes in the transit system.

Valley Metro is the regional public transportation agency providing coordinated, multi-modal transit options to residents of Maricopa County and the region's service area. Valley Metro provided the demographics for this report.

The demographic data shown in this report is from the following sources:

- 2011-2016 American Community Survey (ACS)
- 2014-2015 Onboard Survey (O&D), please refer to **Attachment G: 2014-2015 On-board Transit Survey Report**

5.2 Valley Metro Demographic Data Overview



OVERVIEW

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

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

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

CENSUS DATA

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

Table 3 Minority and Low-Income Population Summary

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

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

Table 4 Racial and Hispanic Distribution

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

PASSENGER SURVEY (ORIGIN AND DESTINATION SURVEY)

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

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

- Nearly 11,800 people who do not have cars
- More than 2,300 people under age 18

Section 5: Demographic Data and Maps

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

Major Findings

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

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

Please refer to ***Attachment G: 2014-2015 On-board Transit Survey Report***.

5.3 Demographic Maps Overview

Following is a description for each map on the following seven pages.

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

Map 2 displays a closer view of fixed route transit service in the region.

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

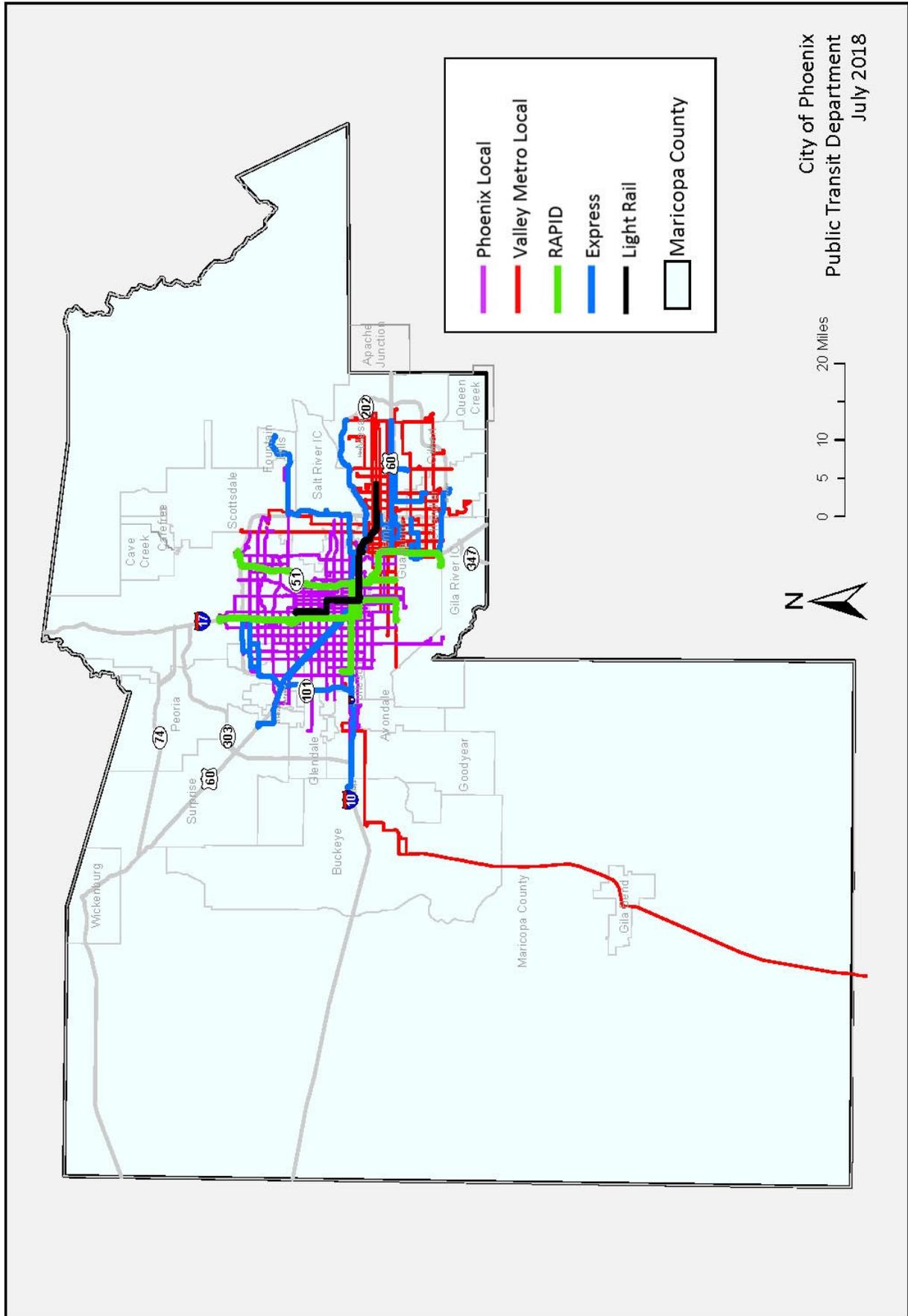
Map 4 visually represents the low-income population and their relation to the regional transit system amenities which includes bus stops, light rail stations, park-and-ride facilities, operation facilities and transit centers.

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

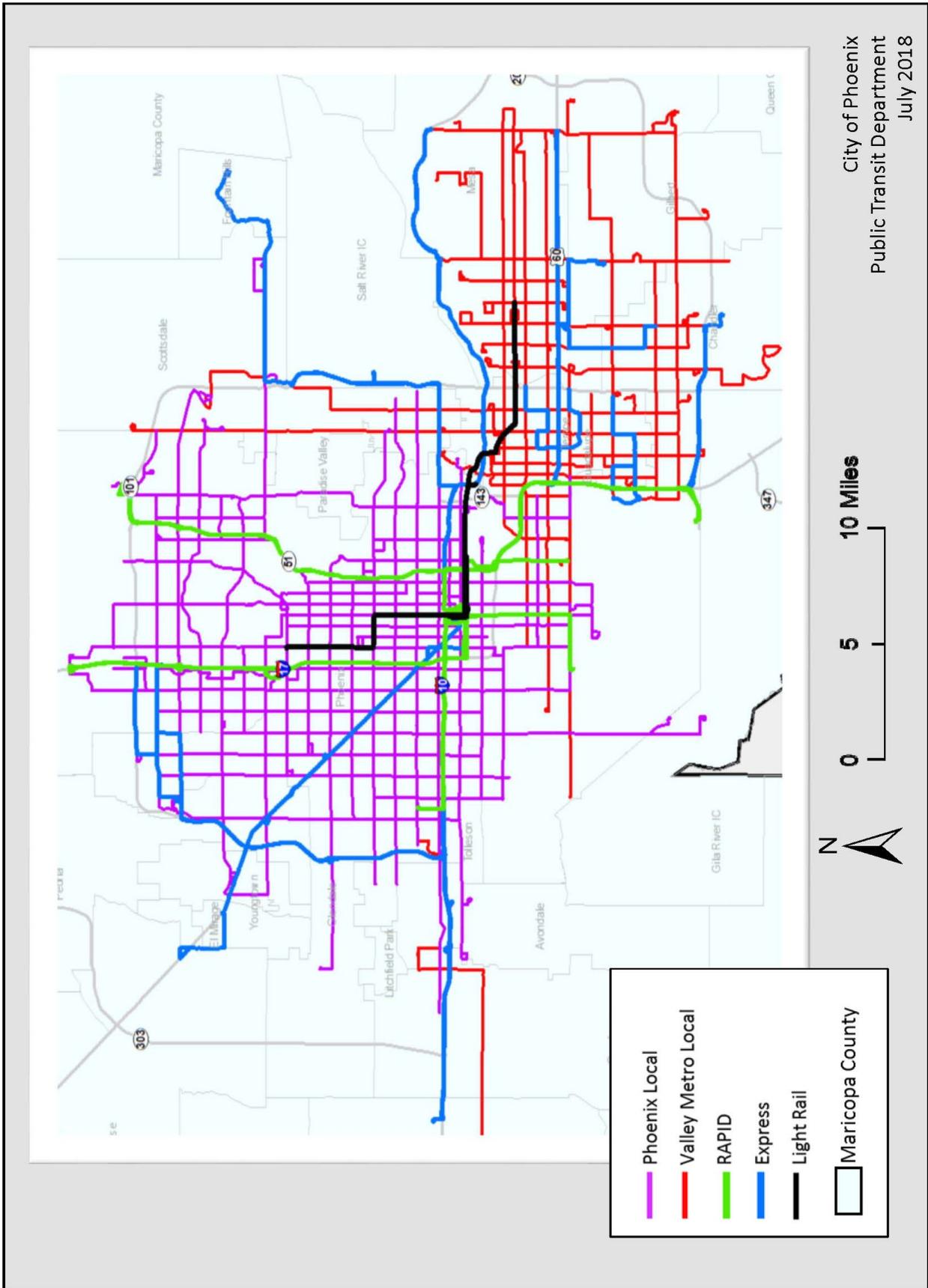
Map 6 displays the concentration of low-income populations within the fixed route transit service area by showing the census tracts that are below and above the route service area low-income population average.

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

Map 1: Maricopa County and Regional Fixed Route Transit Service

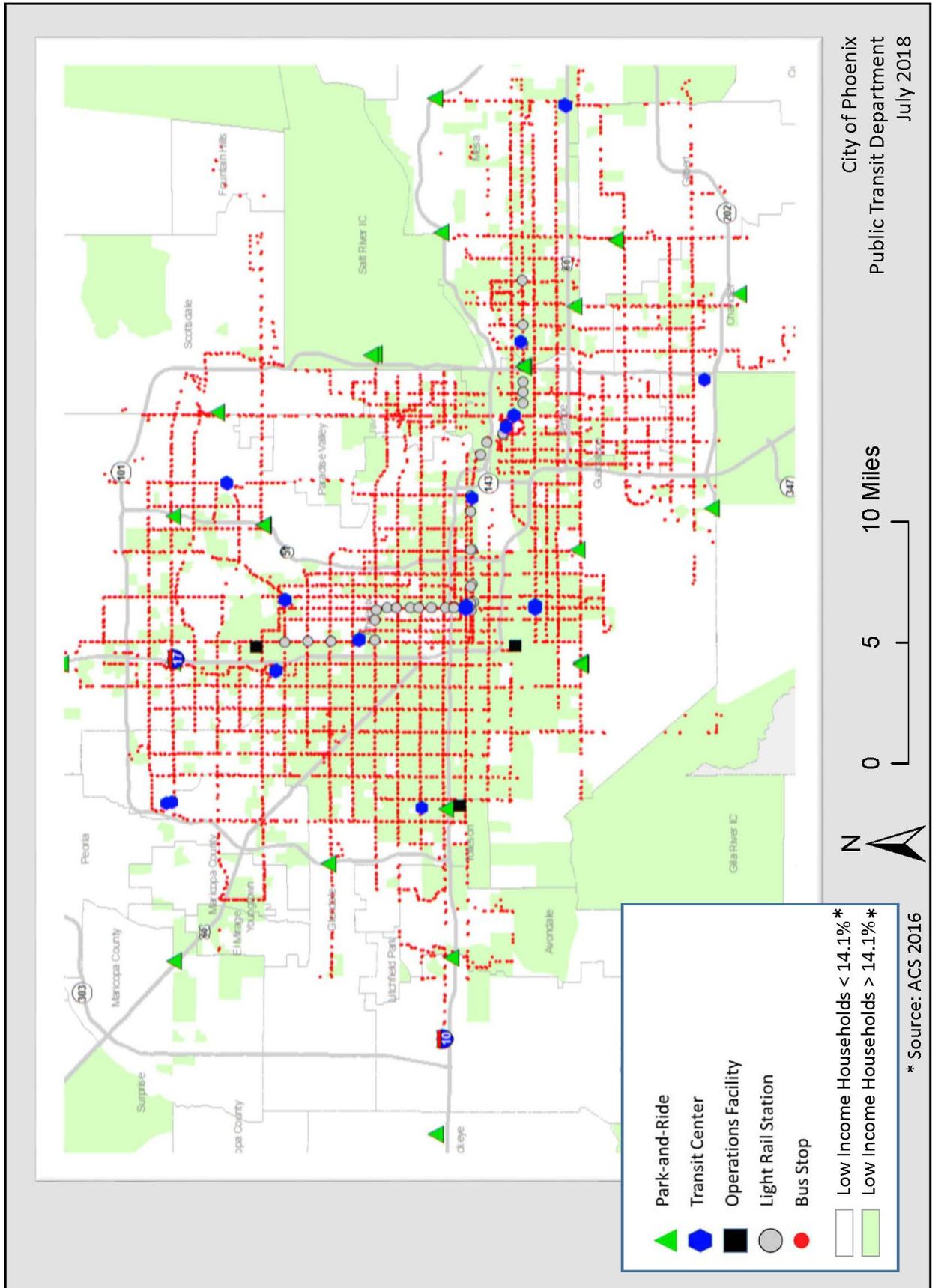


Map 2: Maricopa County and Regional Fixed Route Transit Service (Zoom View)

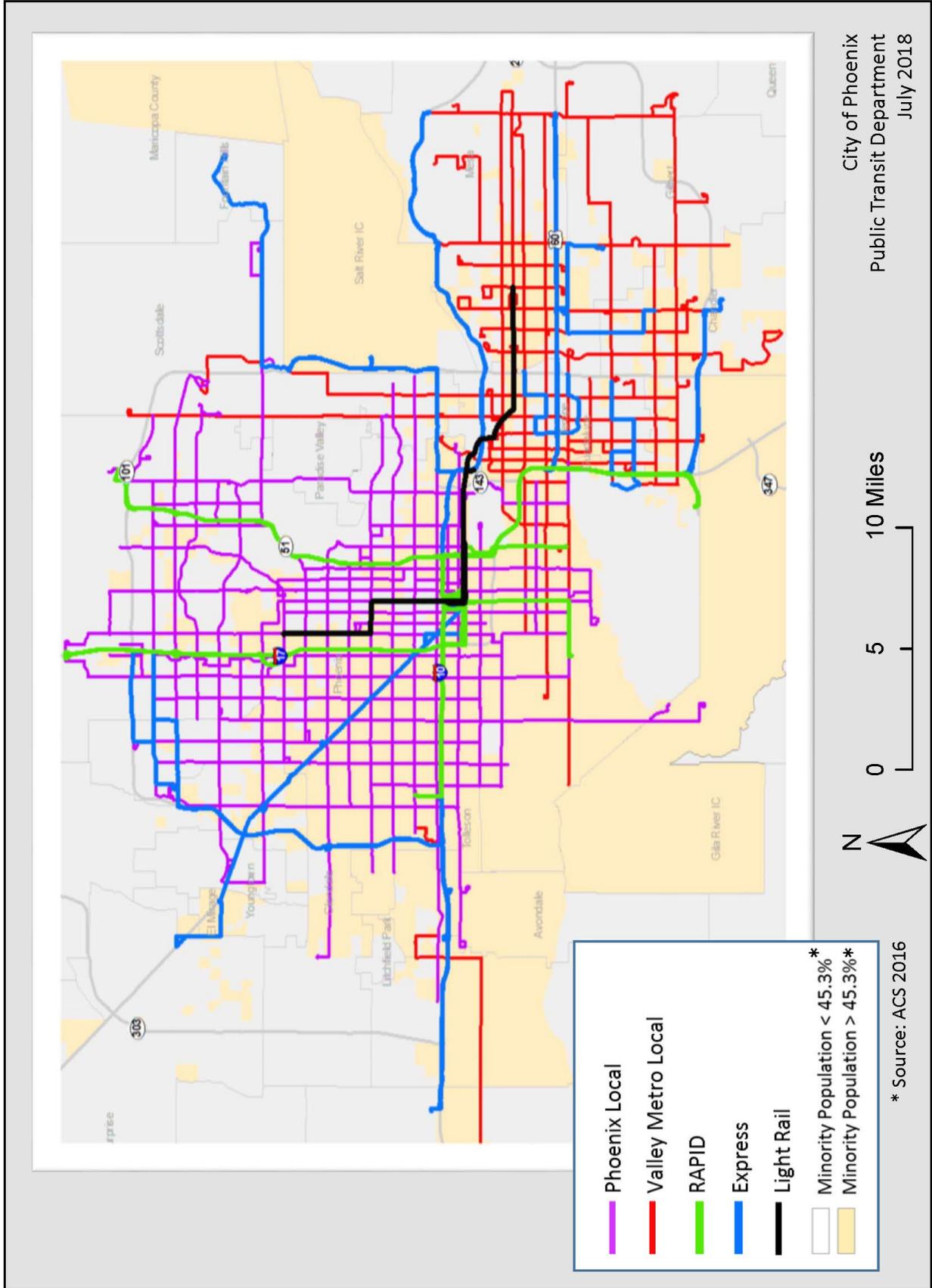


City of Phoenix
Public Transit Department
July 2018

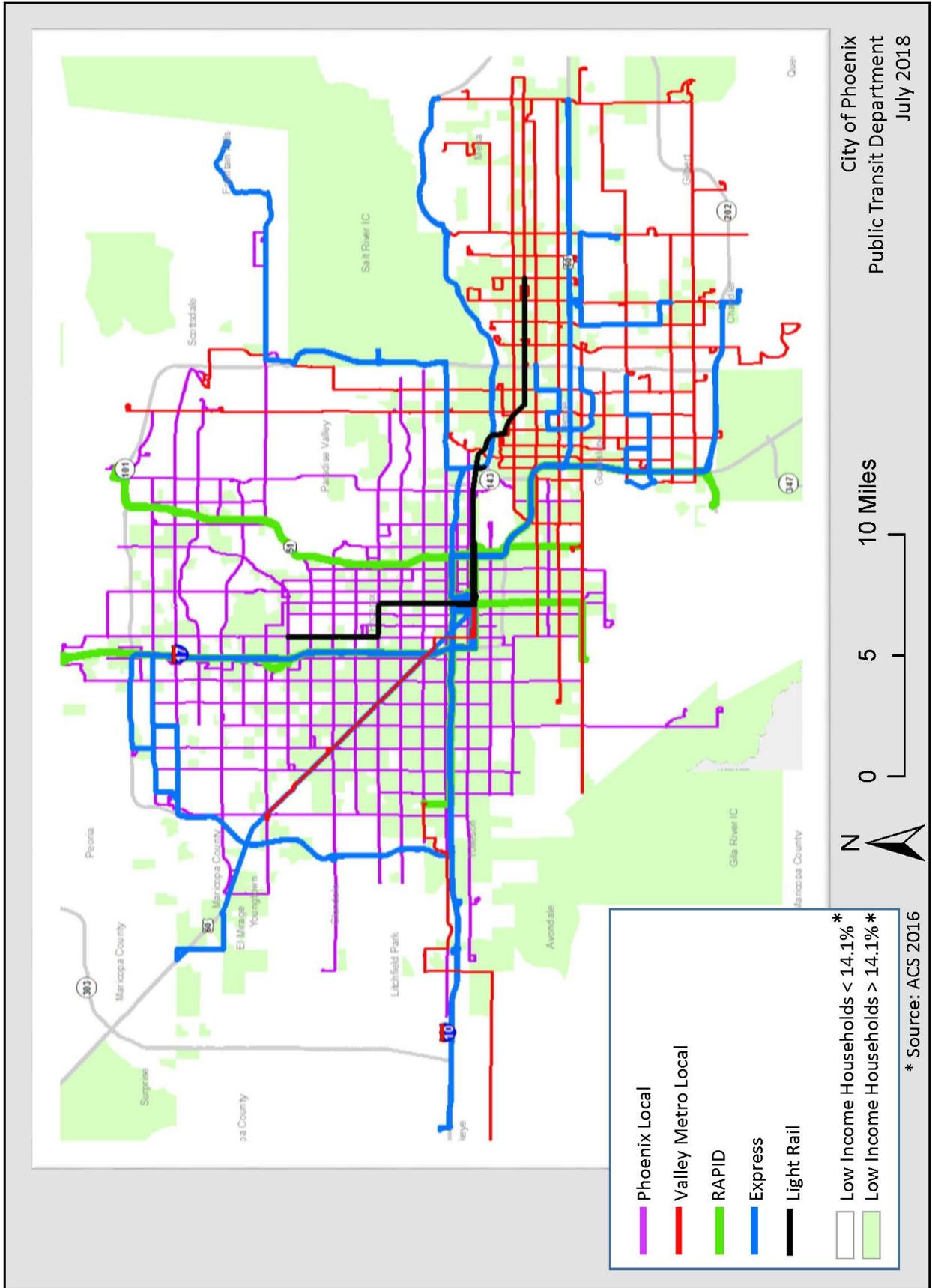
Map 4: Regional Fixed Route Amenities and Low-Income Population



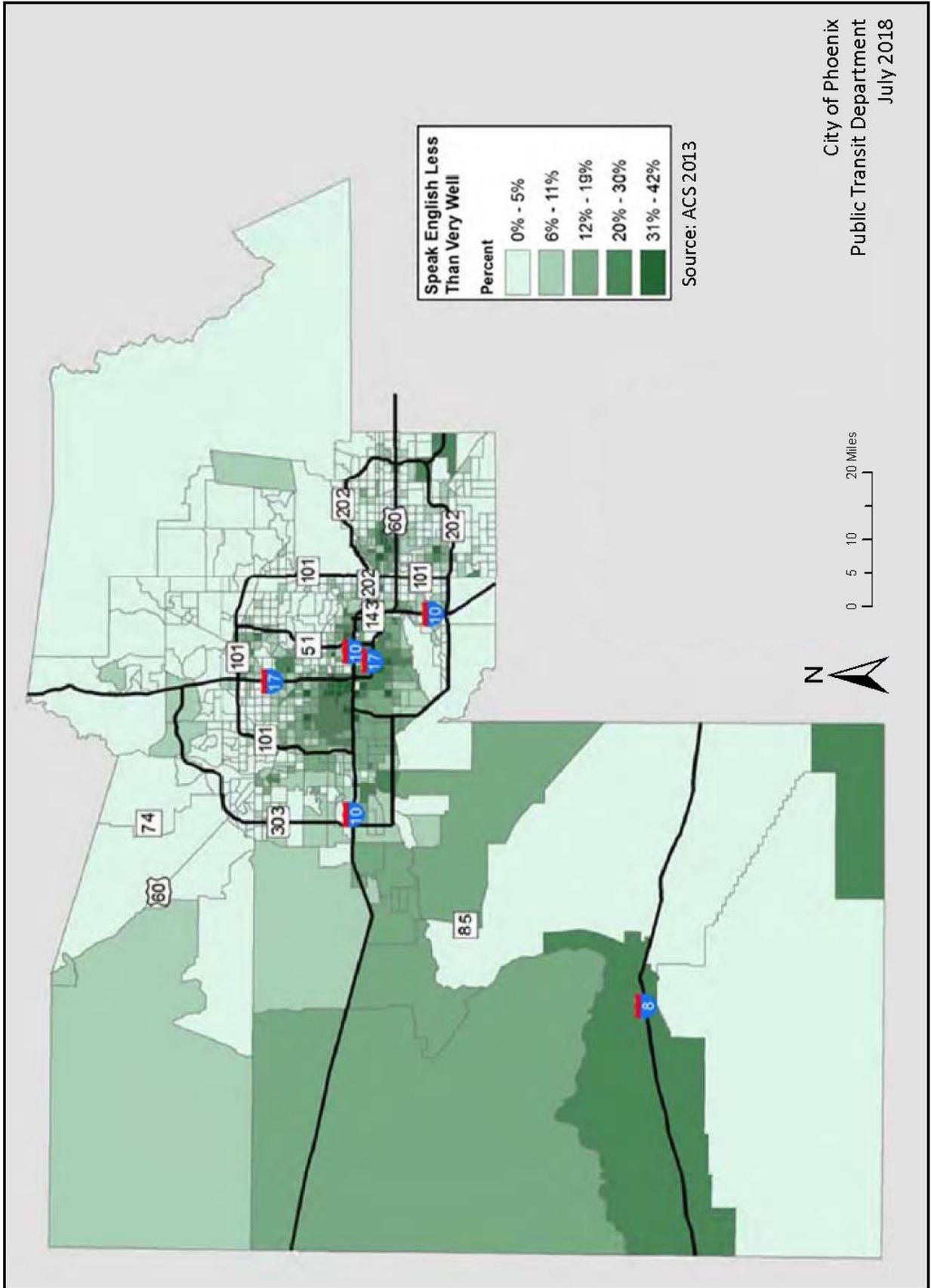
Map 5: Regional Fixed Route Transit Service and Minority Population



Map 6: Regional Fixed Routes and Low-Income Population



Map 7: Regional Limited English Proficiency Population



Section 6: Monitoring Transit Service

6.1: Monitoring Transit Service

FTA requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies. The city of Phoenix frequently monitors its bus services and the siting of transit amenities in an objective manner to identify the potential for adverse, disproportionately high, or disparate impacts to minority populations. Per FTA requirements, the monitoring report will be utilized to provide suggested corrective actions for consideration, awareness and approval by city council.

The city of Phoenix's Title VI 2018 Monitoring Program is guided by the FTA Circular 4702.1B, Chapter IV-9 and the City's System-Wide Standard and Policies.

The city of Phoenix has completed an evaluation of transit services based on the System-Wide Standards and Policies identified in Chapter 4 of the report. This report is intended to monitor compliance with the Regional Standards and Policies for fixed route services. Please refer to **Attachment F: 2018 Monitoring Report**.

Findings

1. **Peak Headway/Peak Trip:** One circulator does not meet 30-minute frequency standard. Minimum headway for circulators is 30 minutes, the headway for ALEX (Minority) is every 60 minutes. Prior to the recession, circulators in Phoenix all ran every 30 minutes. In 2010, circulator services were reduced to every 60 minutes in Phoenix as a result of reduced funding. All other routes meet the 30-minute frequency standard.

The city of Phoenix Public Transit Department does have plans to increase circulator service by implementing 30-minute headway in the next five years.

2. **On Time Performance:** Two fixed routes, Route 7 and Route 27, fall below the 90 percent on-time performance standard.

The city of Phoenix Public Transit Department will evaluate run times and work with our operating contractor to improve on time performance.

3. **Percent Stops with Shade:** Currently none of the bus routes in Phoenix have 100% shaded bus stop coverage. However, from the analysis, it was found that shaded versus non-shaded stops were near equitably distributed amongst both minority versus non-minority stops.

Shade structure installation is currently prioritized by stop boarding volume. Going forward, minority area status will be added as an additional prioritization factor for shade structure installation.

As noted above many of the deficiencies will be addressed through planned Projects.

Section 7: Service and Fare Changes

7.1 Service Equity Analysis

The city of Phoenix has implemented several changes since 2015 as reported in the following Equity Analysis. The city of Phoenix conducted a number of public outreach events and solicited public comment throughout the region.

Table 4: Service Equity Analysis Report

Phoenix Bus Service Changes Approval Dates					
	Citizens Transportation Commission	Transportation & Infrastructure Subcommittee	City Council	Service Implementation Date	Estimated Financial Impact
April 2018	1/4/2018	1/9/2018	1/24/2018	4/23/2018	\$ 1,810,000
October 2017	5/25/2017	6/13/2017	8/30/2017	10/23/2017	\$ 1,372,000
April 2017	11/17/2016	12/13/2016	1/11/2017	4/24/2017	\$ 10,270,000
October 2016	5/26/2016	6/16/2016	6/21/2016	10/24/2016	\$ 17,300,000
April 2016	11/10/2015	12/8/2015	1/6/2016	4/25/2016	\$ 709,700
October 2015	5/7/2015	6/9/2015	7/1/2015	10/26/2015	\$ (67,400)
April 2015	10/24/2014	12/9/2014	3/4/2015	4/27/2015	\$ 500

Title VI Service Equity Analysis Report, are provided in **Attachments H.1 to H.7**.

7.2 Major Service Change Policy

All changes in service meeting the definition of “Major Service Change are subject to a Title VI Equity Analysis prior to city council approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the boards for its consideration and included in the subsequent city of Phoenix Title VI Program report with records of approval dates. Please refer to **Attachment I: Major Service Change Equity Evaluation**.

7.3 Fare Changes

The city of Phoenix has not implemented any fare changes since March 1, 2013.

Section 8: Conclusion and Definitions

8.1 Conclusion

The goal of this plan is to document and enhance opportunities for Title VI populations to have a meaningful voice, to receive equal benefits from the city of Phoenix Public Transit Department activities without shouldering a disproportionate share of burdens. The plan itself is considered a work in progress that will evolve as people's needs and participation in the process change.

For more information, please contact the Title VI Coordinator at (602) 262-7242. Thank you for your support of the city of Phoenix Public Transit Department's efforts throughout the Metropolitan Phoenix area.

8.2 Definitions

City of Phoenix Public Transit Department: The city of Phoenix Public Transit Department is one of 16 agencies that are members of the Valley Metro regional transit system. The Department operates 70 percent of transit service in the Metropolitan Phoenix area and is the primary recipient of federal funding for public transit in the region. The city of Phoenix Transit Department is responsible for operating a complex transit system, in addition to building and maintaining transit facilities and bus stops throughout the City. The city of Phoenix is also the designated recipient of federal transit funding for Section 5310 funds for the Phoenix/Mesa Urbanized area, providing oversight to organizations providing transportation services to seniors and people with disabilities.

Valley Metro (Valley Metro Regional Public Transportation Authority): Valley Metro is the regional public transportation agency providing coordinated, multi-modal transit options to residents of greater Phoenix. With a core mission of advancing a total transit network, Valley Metro plans, develops and operates the regional bus and light rail systems and alternative transportation programs for commuters, seniors and people with disabilities.

In 1993, the name Valley Metro was adopted as the identity for the regional transit system in the metropolitan Phoenix region. Under this brand name, local governments set the policy for the regional system that operates throughout the Valley.

Valley Metro is governed by two Boards of Directors. The Regional Public Transportation Authority (RPTA) Board consists of 16 public agencies (15 cities and Maricopa County) that set the policy direction for all modes of transit except light rail. The Valley Metro Rail Board consists of five cities that set the policy direction for light rail high-capacity transit. The Boards and the agency work to improve and regionalize the public transit system.

Maricopa Association of Governments (MAG): MAG serves as the **regional planning agency and Council of Governments for the metropolitan Phoenix area**. When MAG was formed in 1967, the elected officials recognized the need for long-range planning and policy development on a regional scale. They realized that many issues such as transportation, air quality and human services affected residents beyond the borders of their individual jurisdictions. MAG is the designated metropolitan planning organization (MPO) for transportation planning in the Maricopa metropolitan region, including Maricopa County and portions of Pinal County. MAG has also been designated by the Governor to serve as the principal planning agency for the region in a number of other areas, including air quality, water quality and solid waste management. In addition, through an Executive Order from the Governor, MAG develops population estimates and projections for the region.

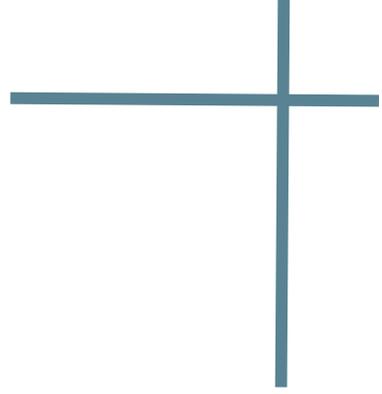
Title VI: The Civil Rights Act of 1964 is a comprehensive U.S. law intended to end discrimination based on race, color, religion, or national origin. It guarantees a number of protections, including nondiscrimination in the distribution of funds under federally assisted programs, or Title VI. Specifically, it states, "No **person** in the **United States** shall, on the grounds of **race, color, or national origin** be **excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance.**" (42 USC 2000d).

Section 8: Conclusion and Definitions

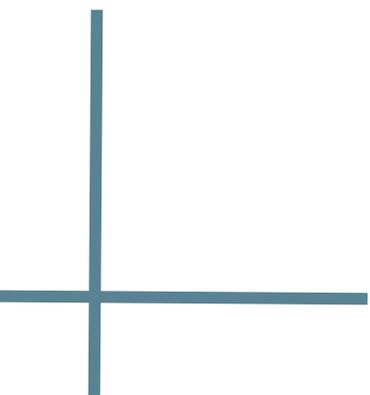
Communities of Concern: Federal legislation has identified vulnerable populations that receive protection to end discrimination and ensure equal access to all federally funded services. This includes the Civil Rights Act of 1964, Executive Order 12898, and Executive Order 13166. These mandated populations include minorities, people with low incomes, people with Limited English Proficiency (LEP), and people with disabilities.

Executive Order 12898: In 1994, President Bill Clinton signed Executive Order 12898, which mandated equitable treatment of minorities and people with low incomes by requiring federal agencies and recipients of federal funding to **identify**, and **address**, as appropriate, certain **disproportionately high** and **adverse** effects of its programs, policies, and activities on **minority populations** and **low income populations**.

Limited English Proficiency: In 2000, President Clinton signed Executive Order 13166, which mandated that people with limited English proficiency (LEP) have meaningful access to services. This requires federal agencies and recipients of federal funding to examine their services and establish guidance on how populations with limited English proficiency can access services, prepare a plan to overcome barriers, and ensure people with limited English proficiency have adequate opportunities for input. A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. A population is defined as LEP when five percent or more of the people living in a geographic area fit this definition.



Attachment A - Valley Metro's 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 Circular (Circular).

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

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

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 com-

Section 9: Attachment A - Valley Metro's Public Participation Plan

munity). 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.
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- 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 organiza-

Section 9: Attachment B—Valley Metro Language Assistance Plan

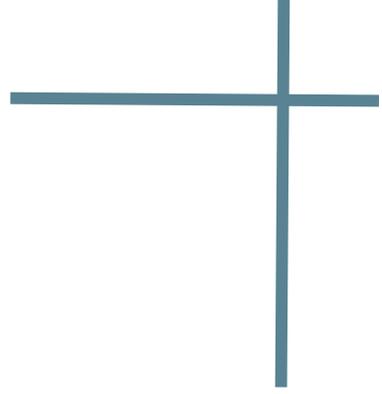
tions as well as via door hangers, direct mail, newspaper advertisement, electronic messaging (email through existing database), social media, door-to-door canvassing and on-board announcements on the transit system.

- 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.

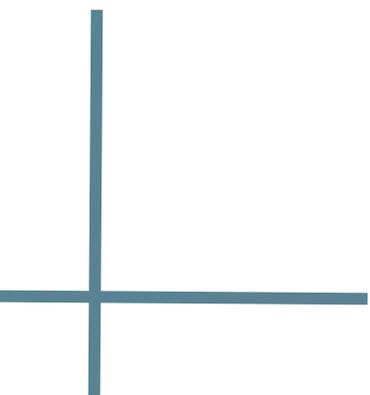
Depending upon the type of project, program, or announcement, public participation methods may be customized to ensure that the general public is adequately involved in the decision-making process.

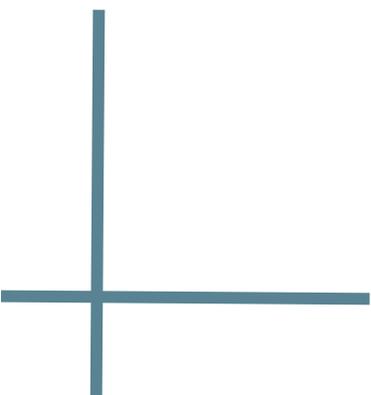
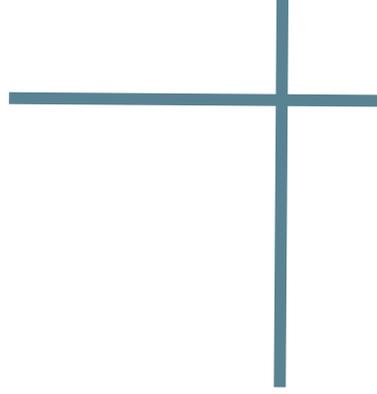
Conclusion

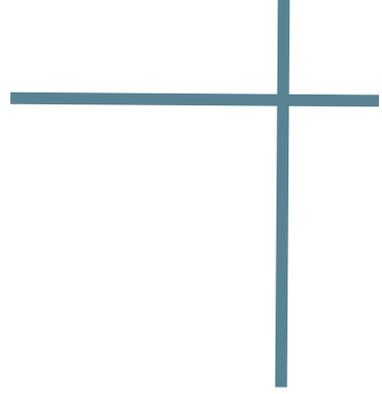
Valley Metro conducts public outreach throughout the year to involve the general public with agency activities and transit planning processes. Using a variety of communication techniques such as facilitating meetings at varied times and locations, using multiple formats, placing printed materials at 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.



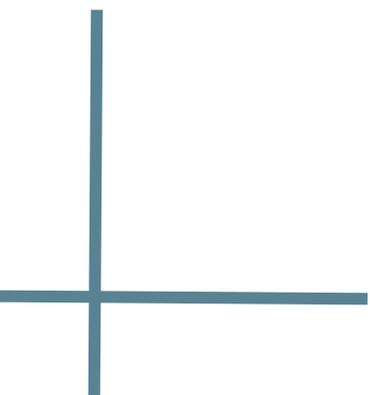
Attachment B—Valley Metro Language Assistance Plan

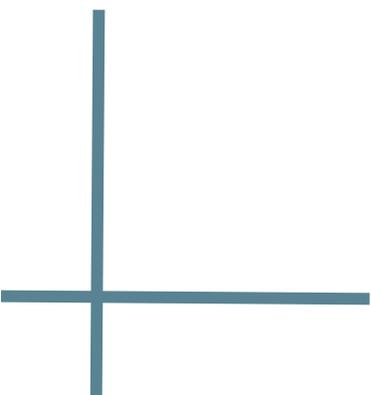
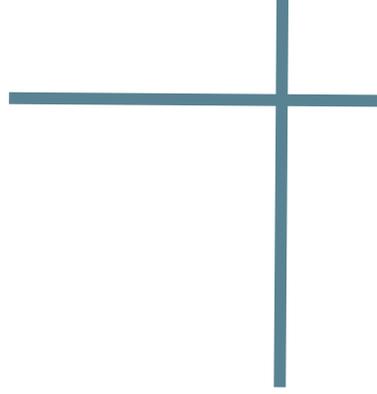


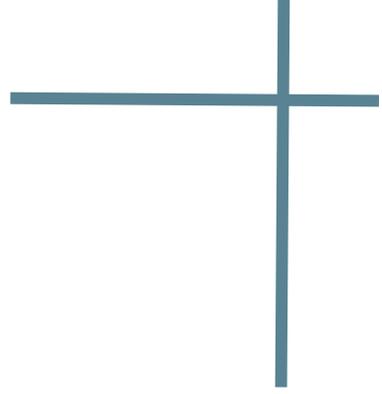




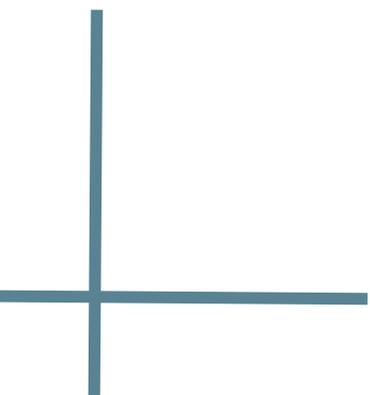
Attachment C - Desert Sky Facility Site Equity Analysis

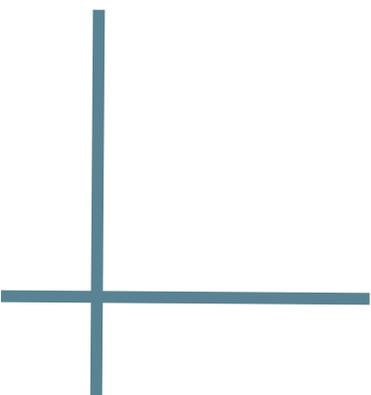
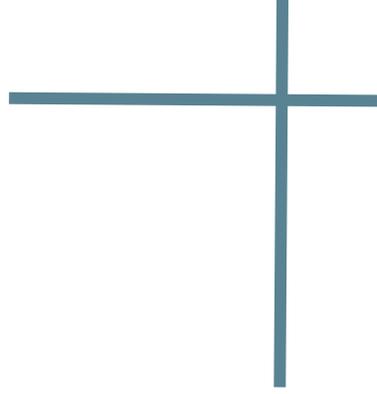


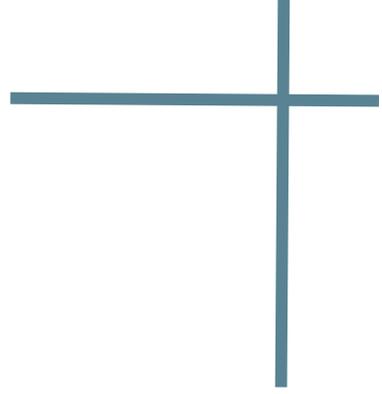




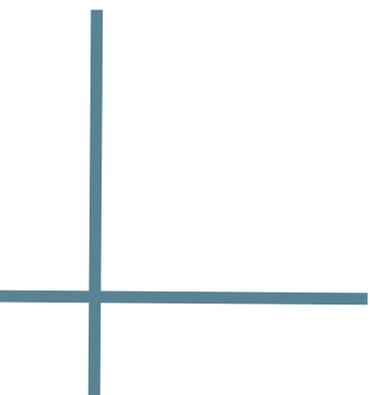
Attachment D - Desert Sky NEPA Approval

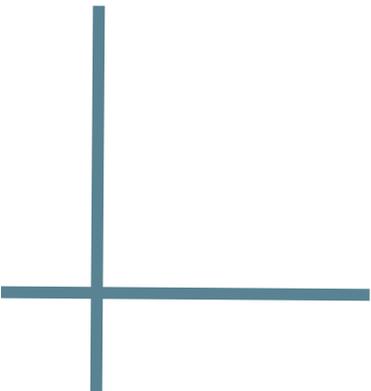
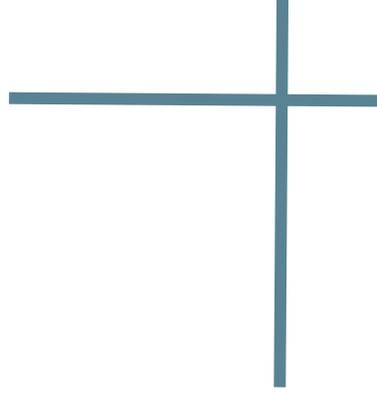


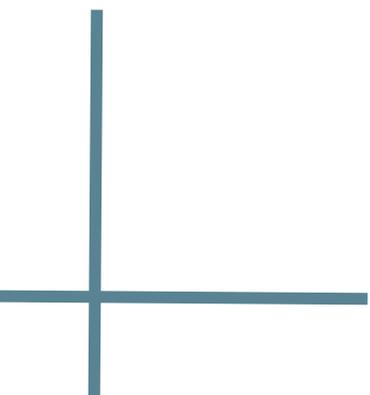
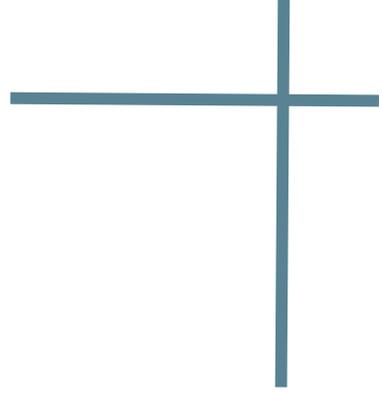


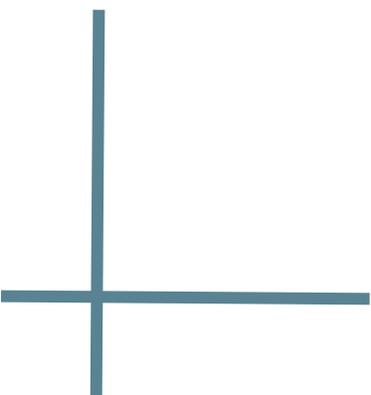
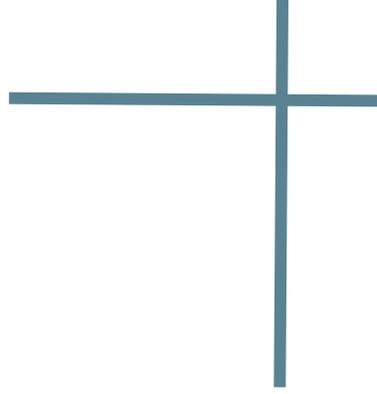


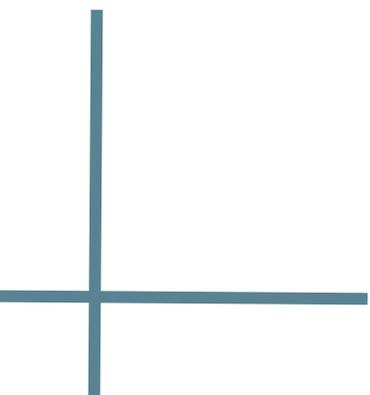
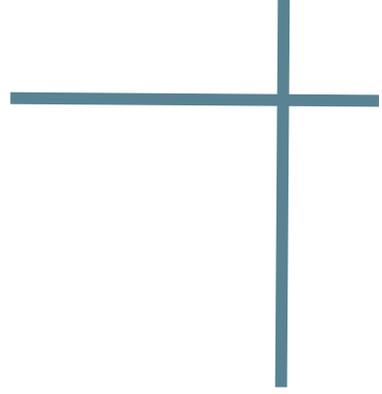
Attachment E - Compliance Monitoring Checklist

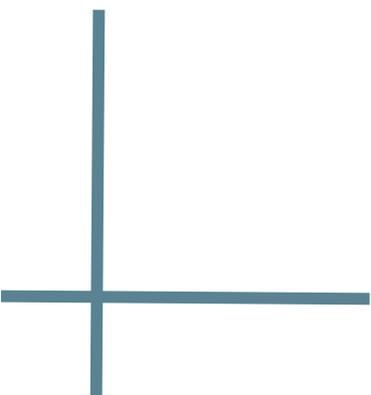
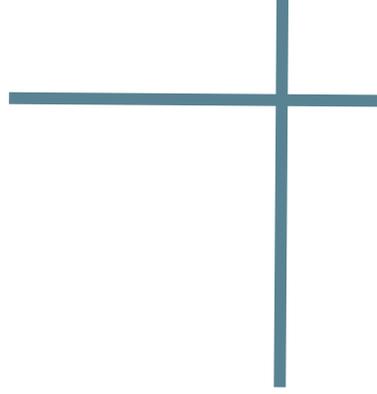


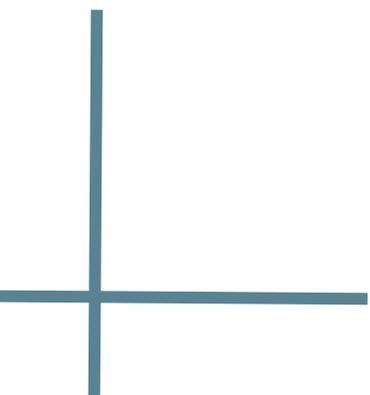
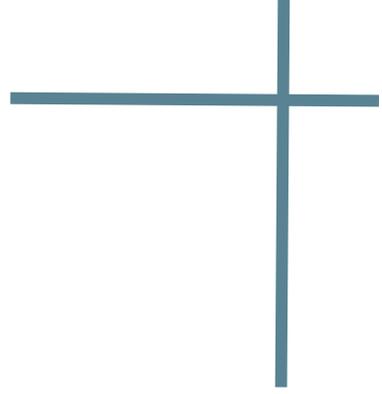


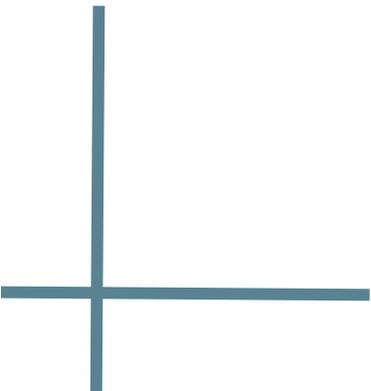
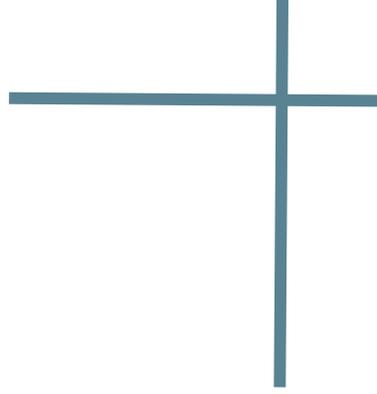


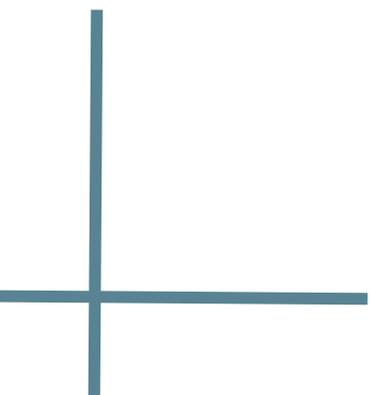
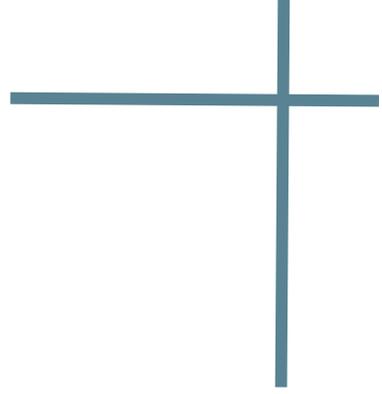


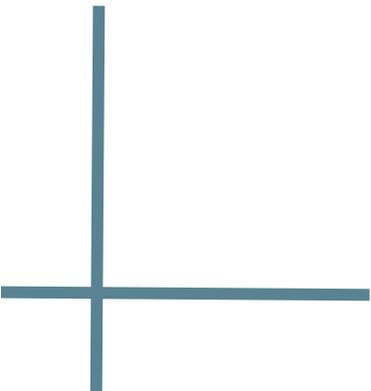
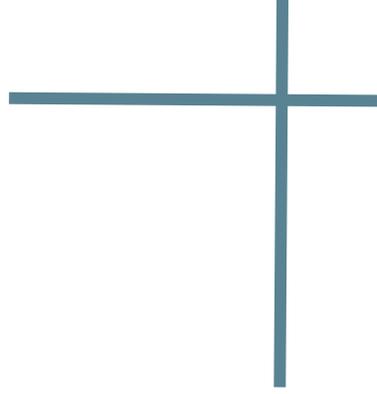


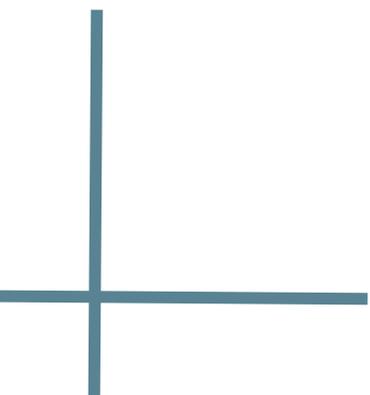
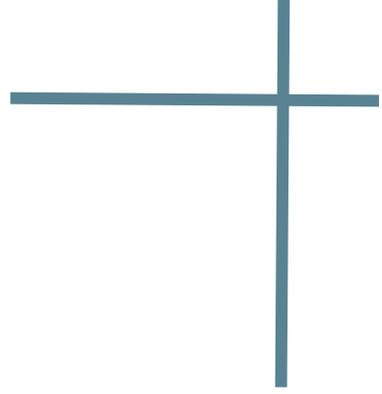


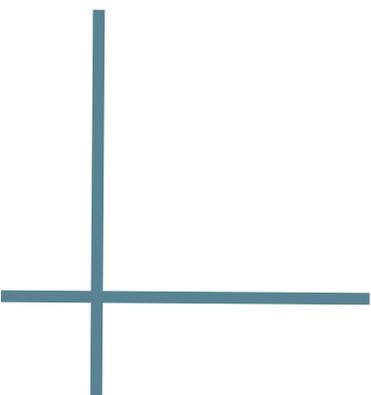
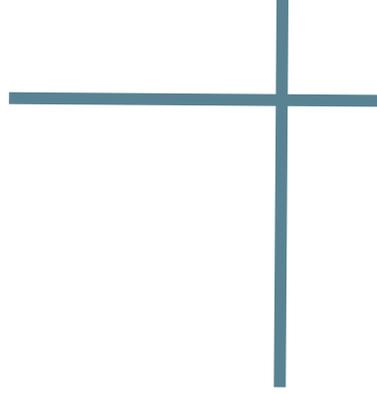


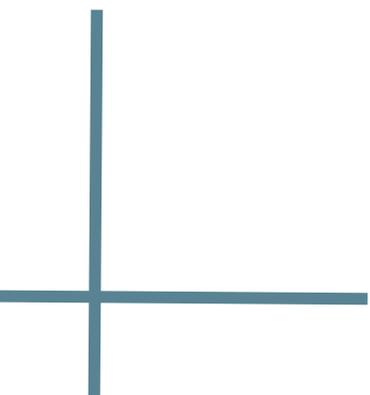
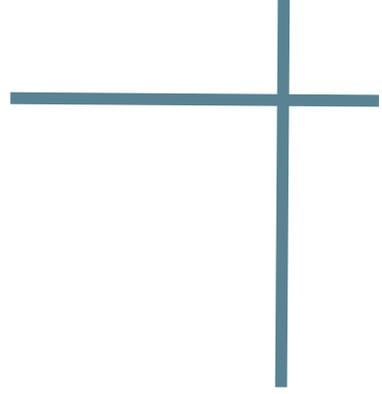


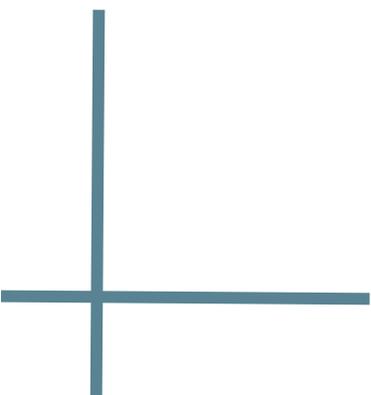
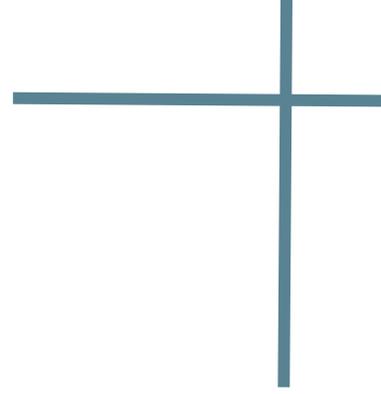


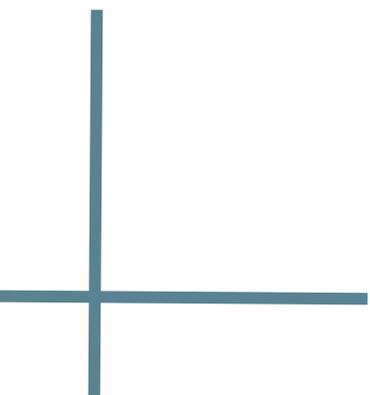
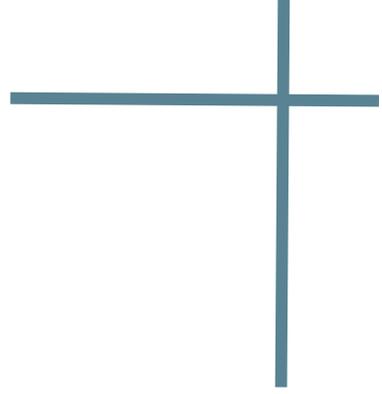


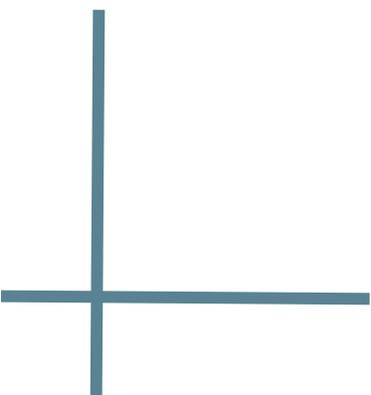
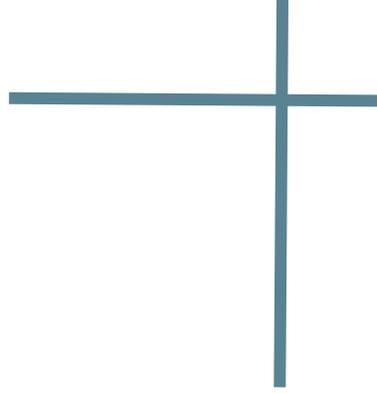


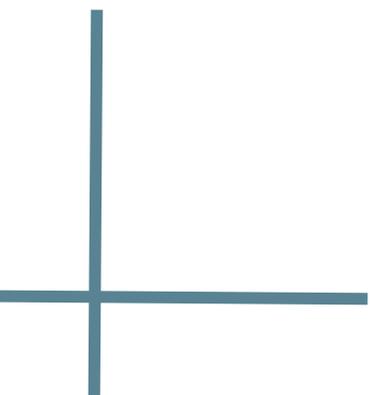
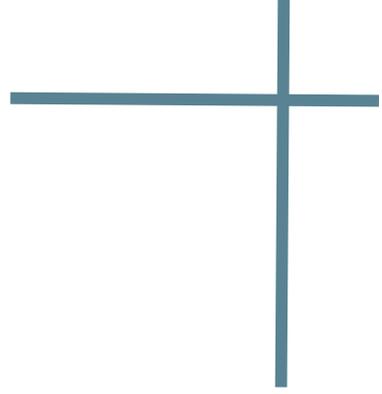


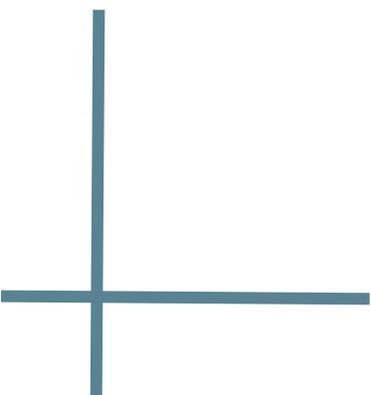
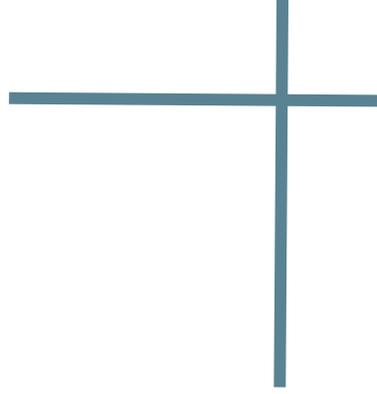


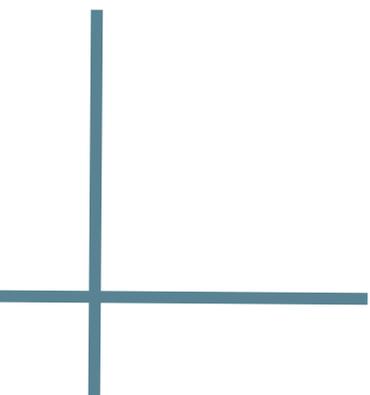
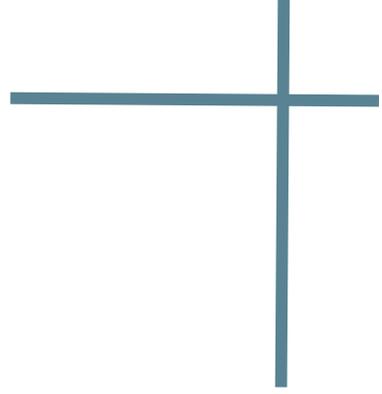


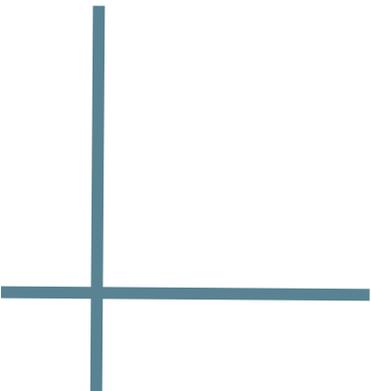
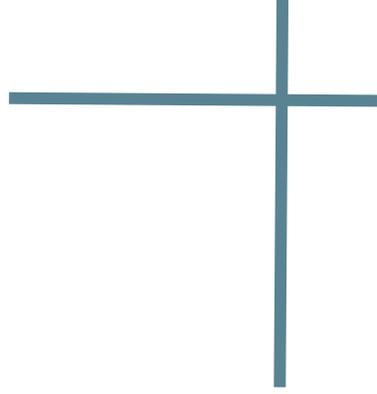


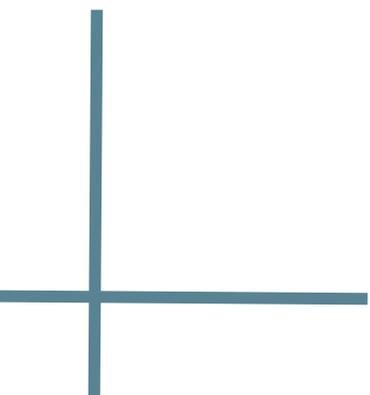
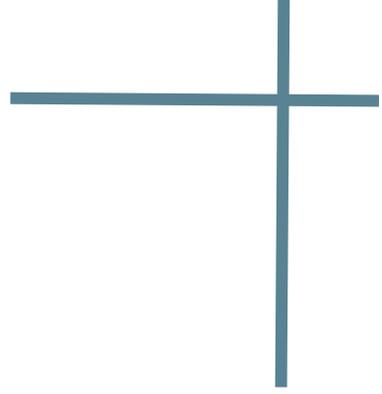


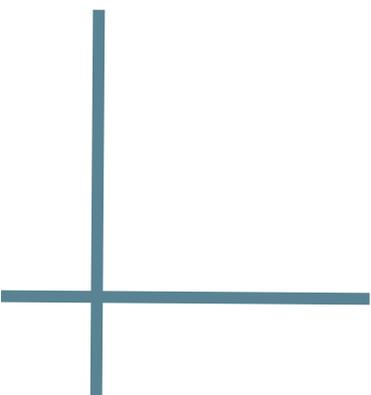
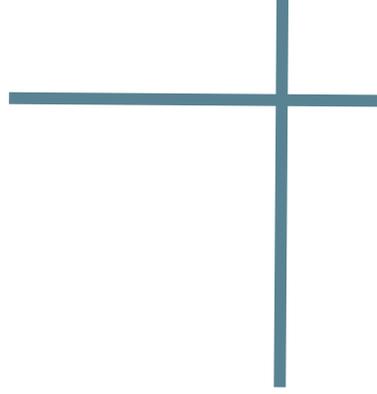


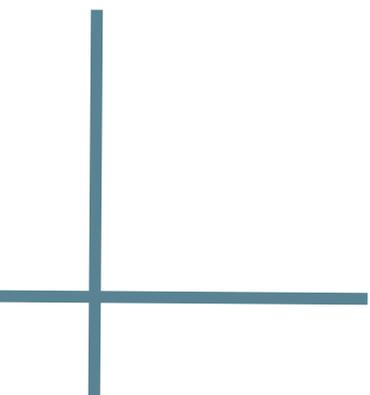
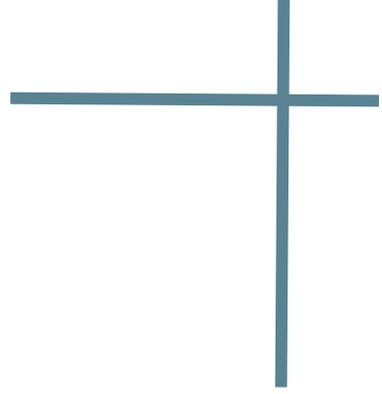


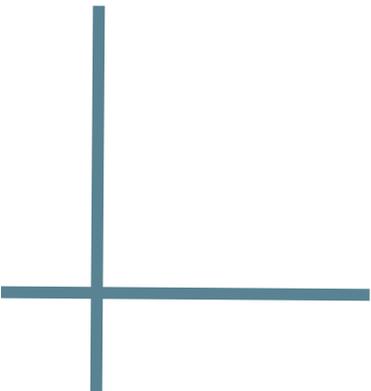
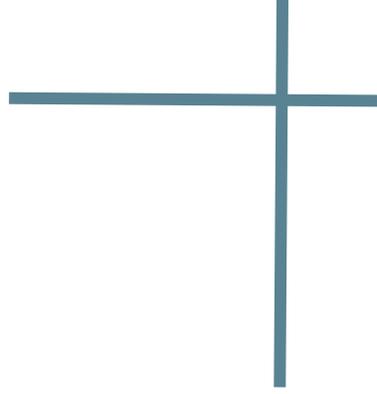


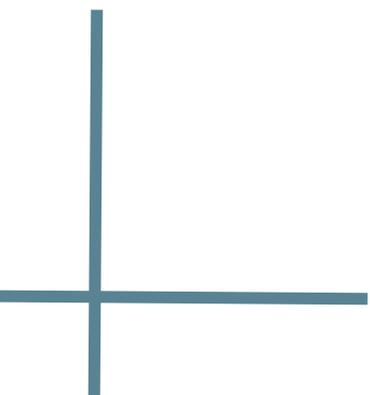
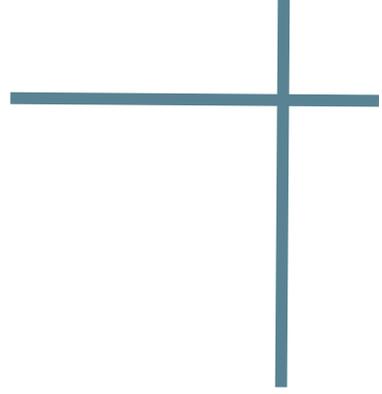


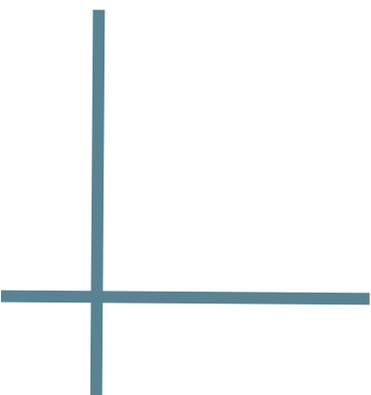
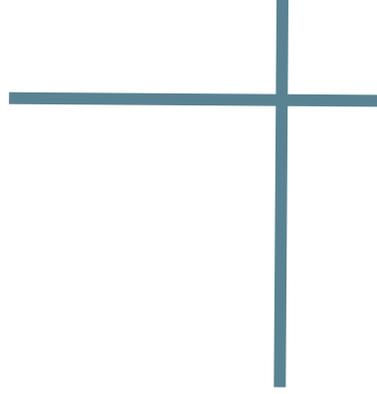


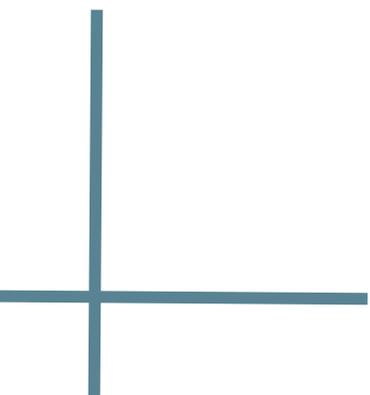
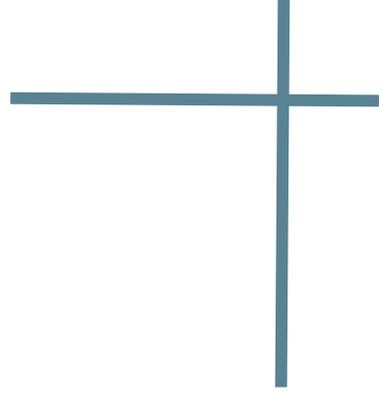


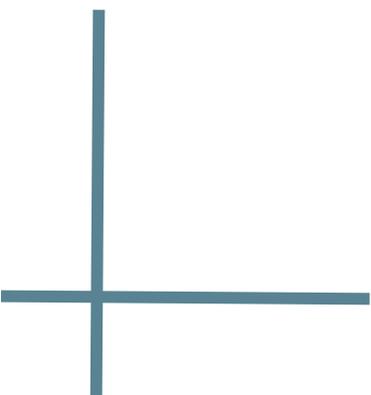
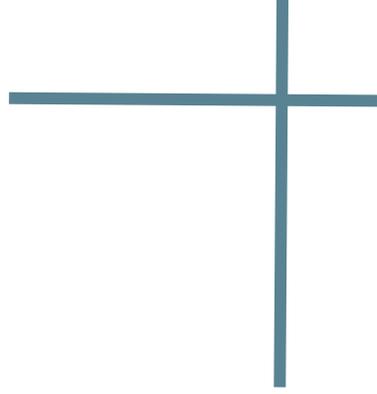


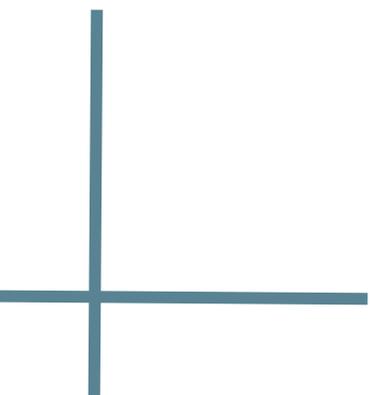
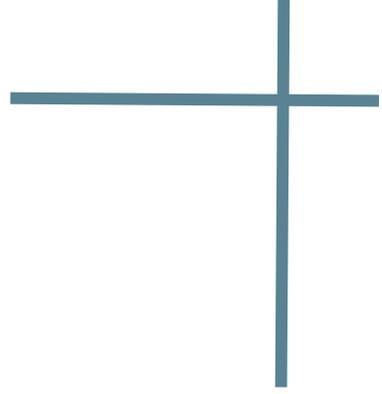


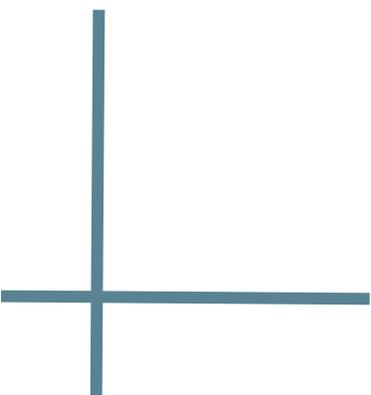
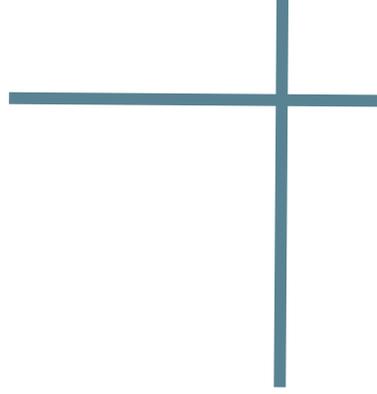


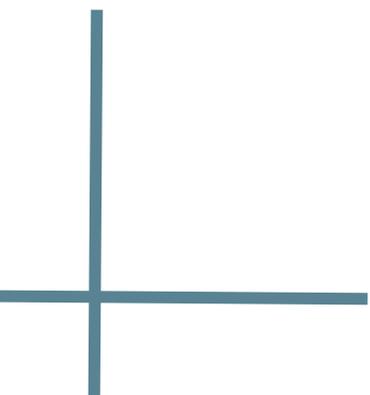
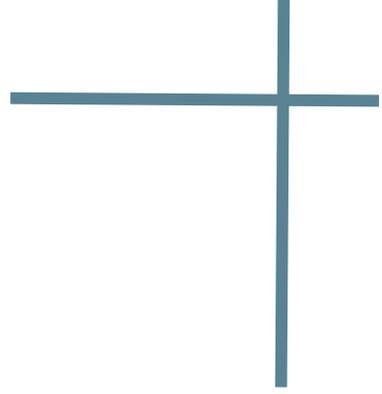


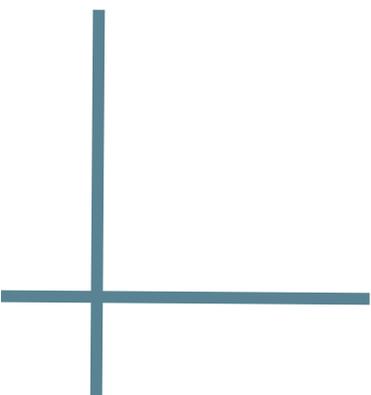
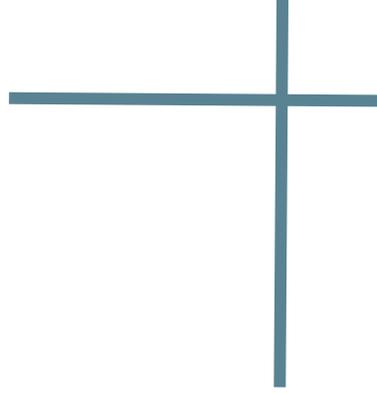


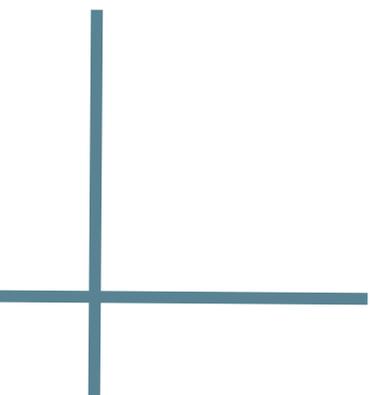
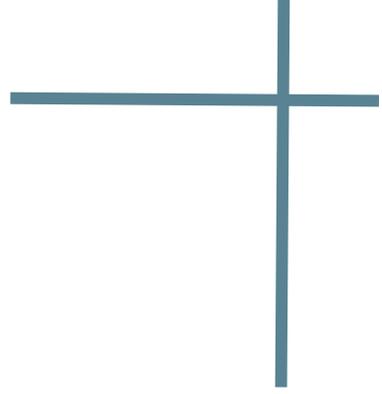


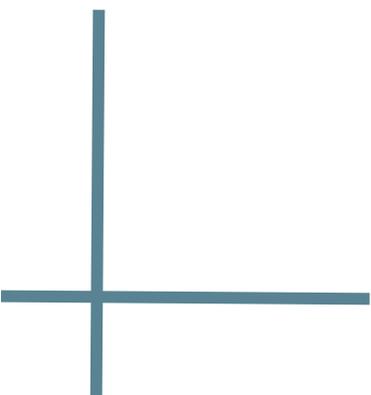
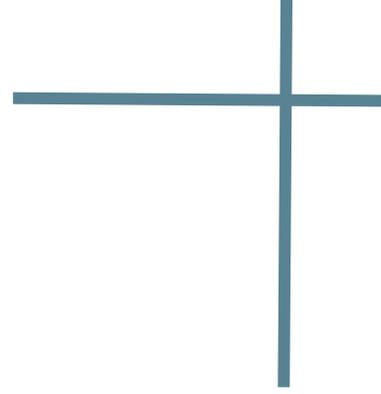


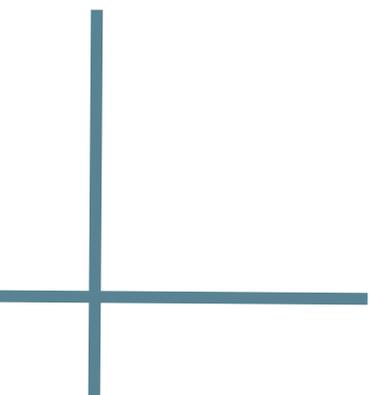
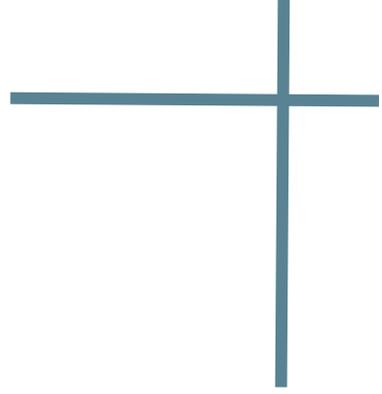


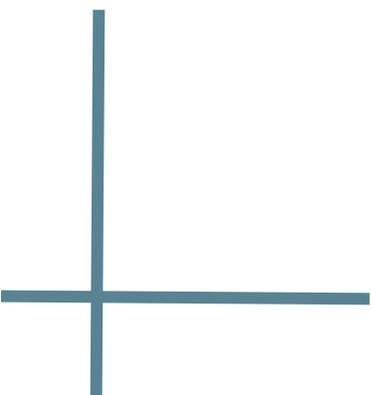
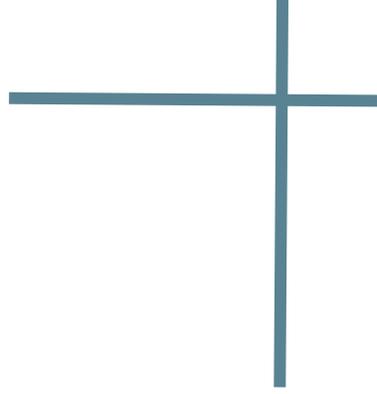


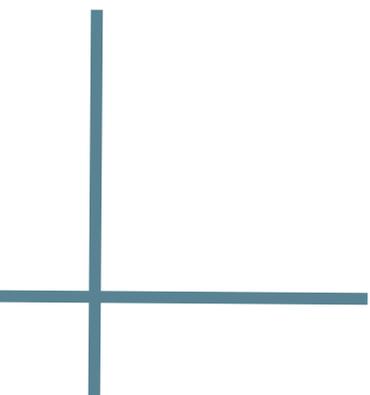
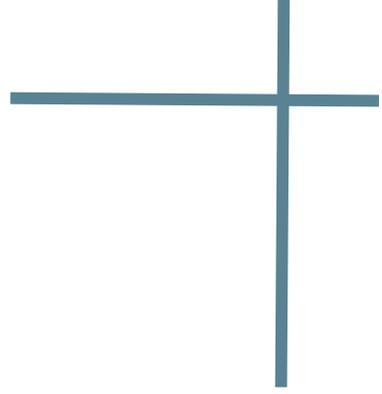


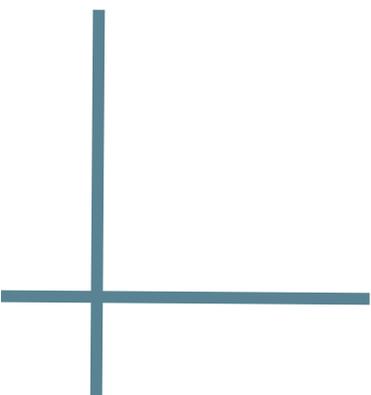
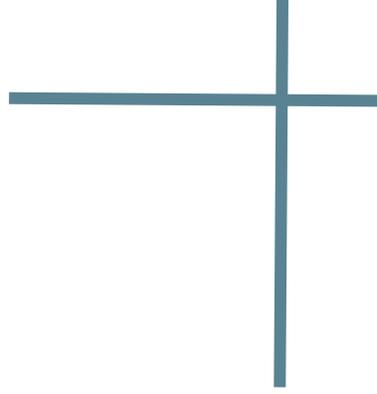


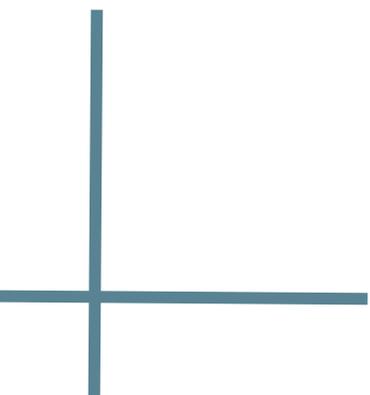
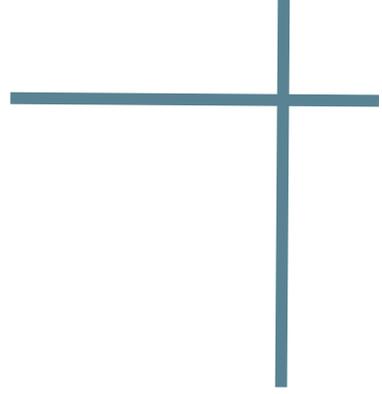


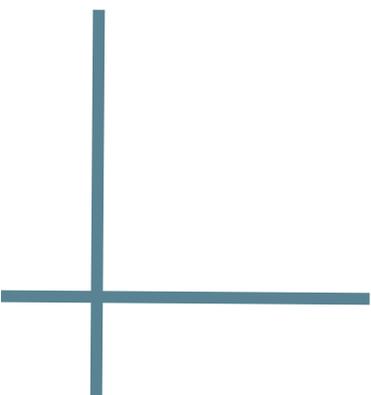
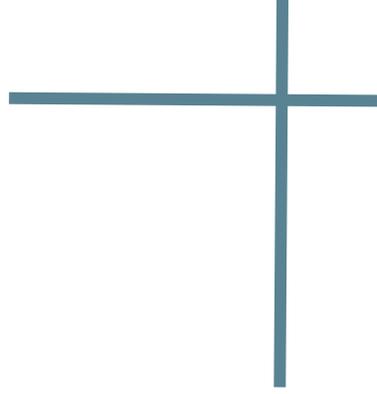


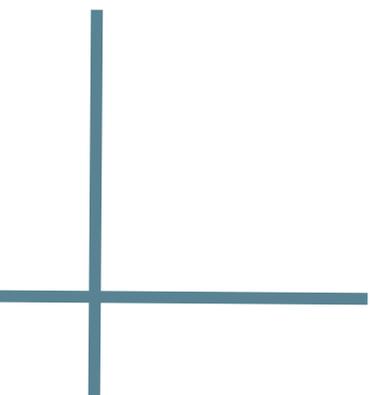
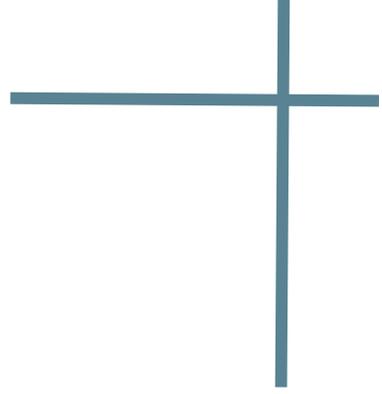


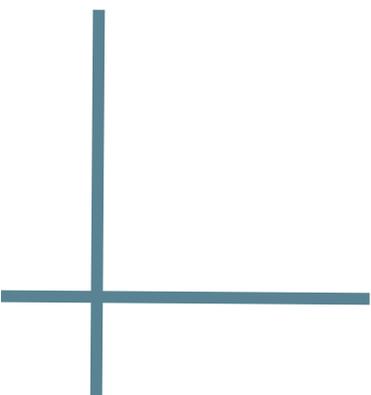
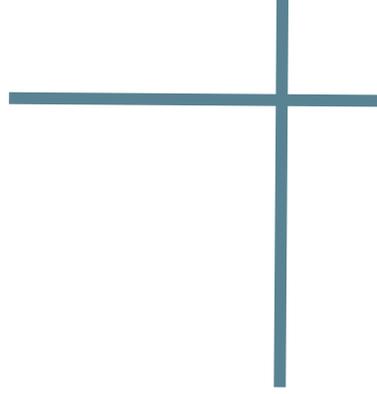


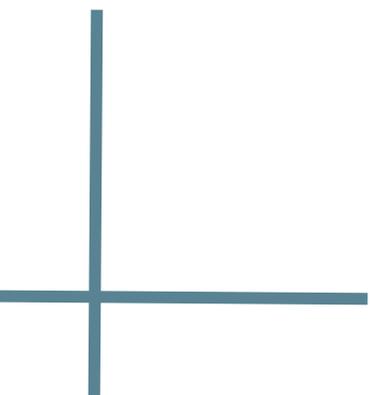
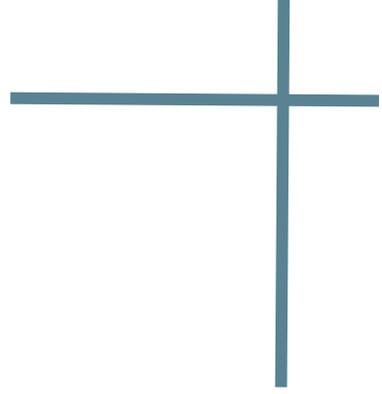


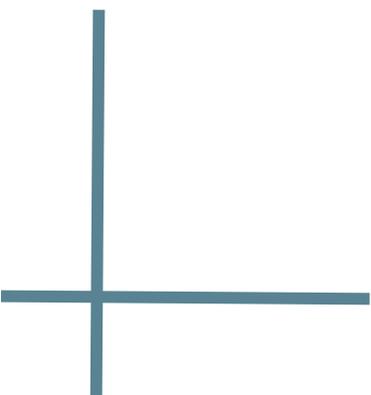
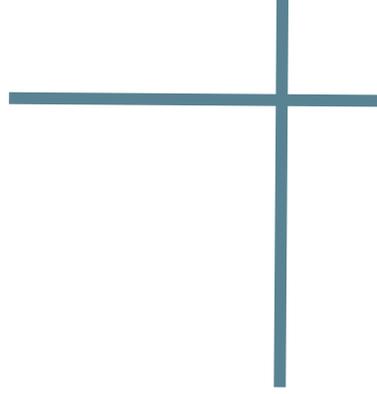


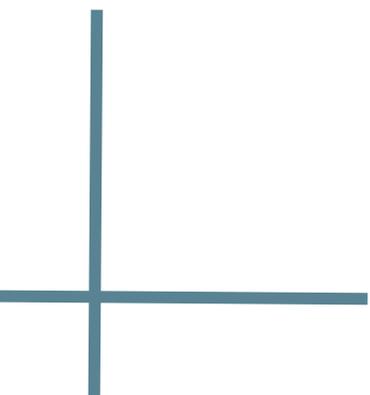
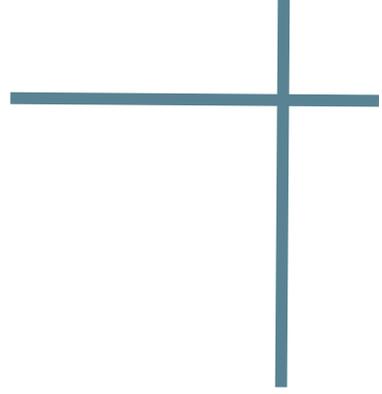


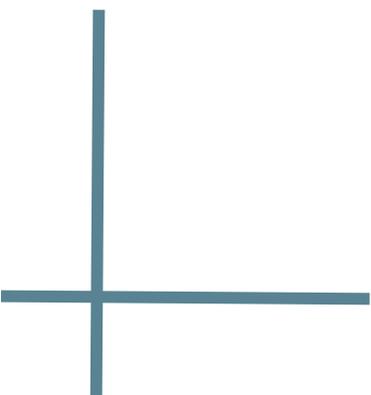
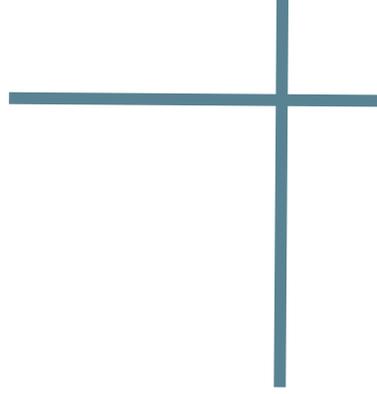


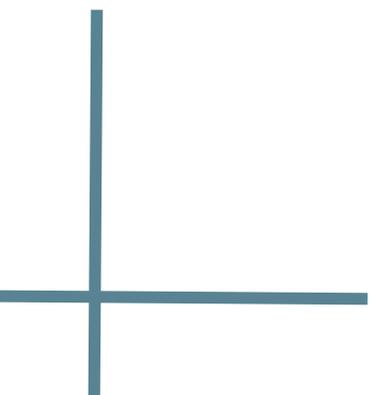
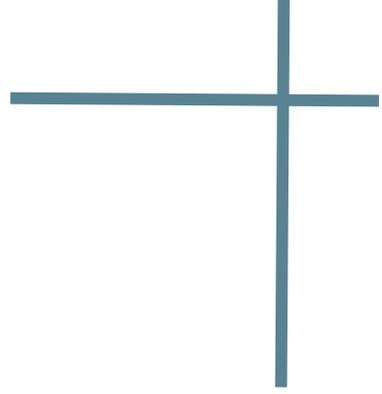


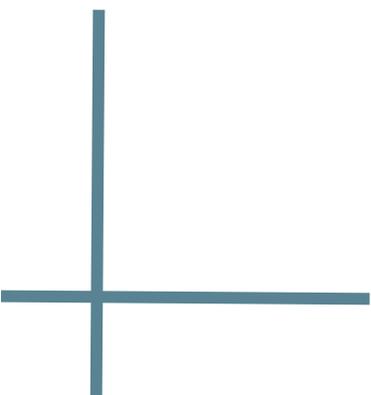
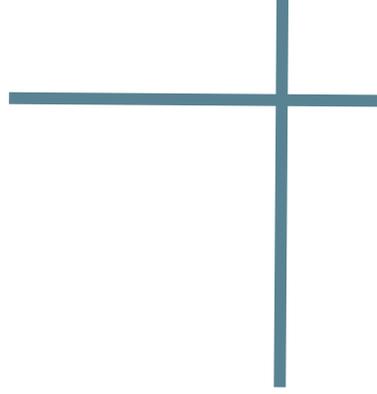


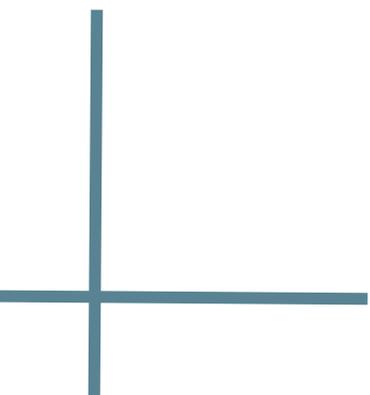
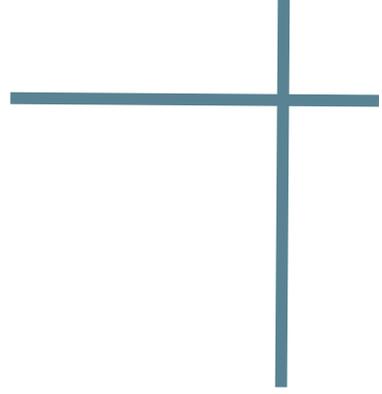


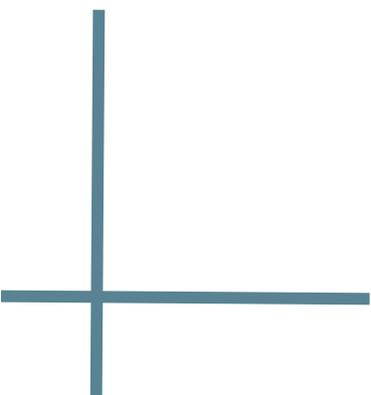
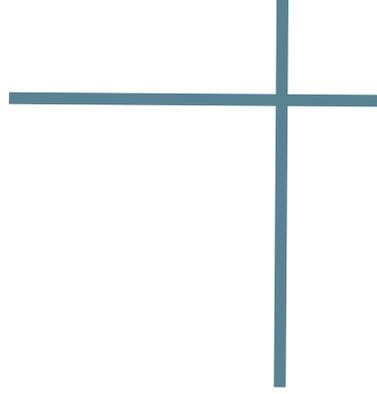


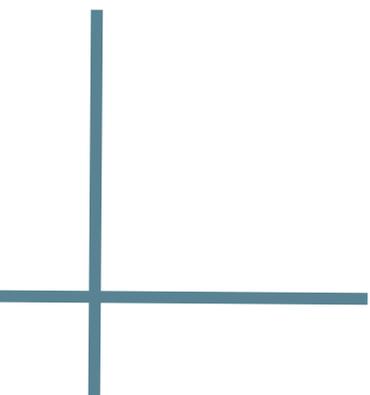
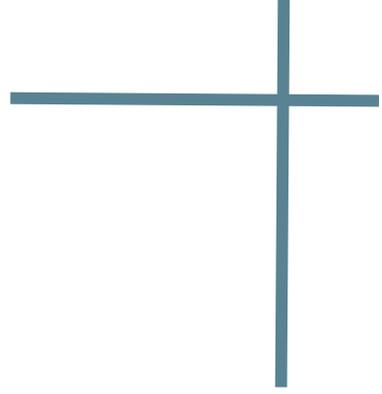


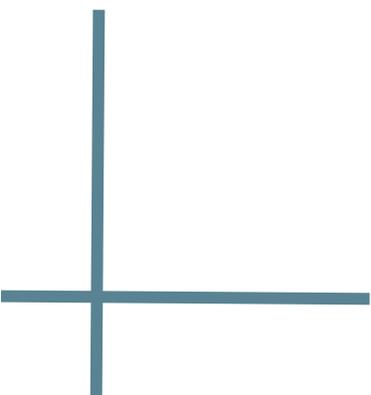
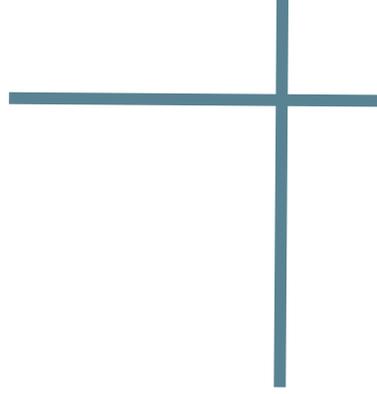


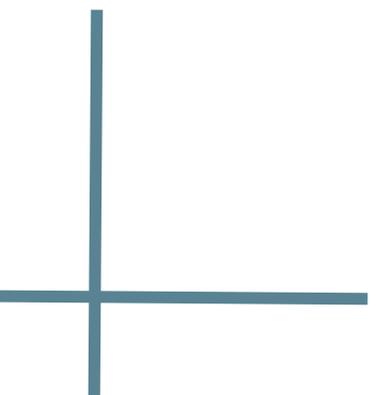
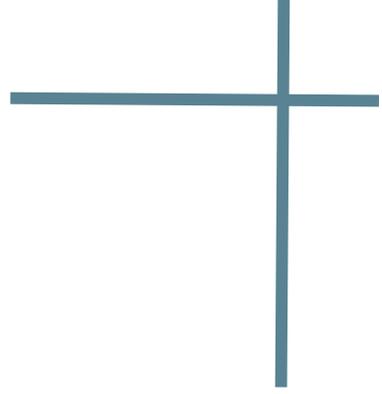


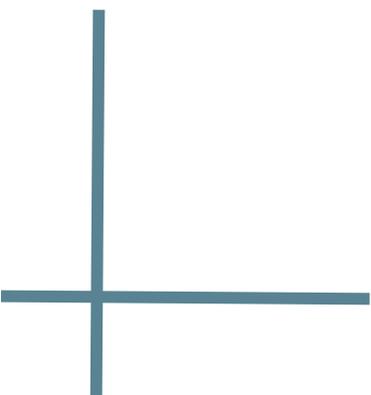
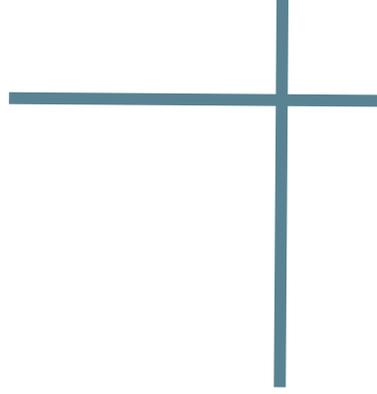


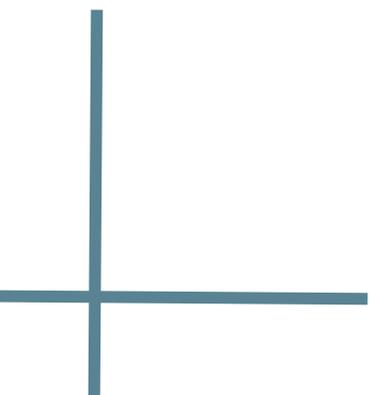
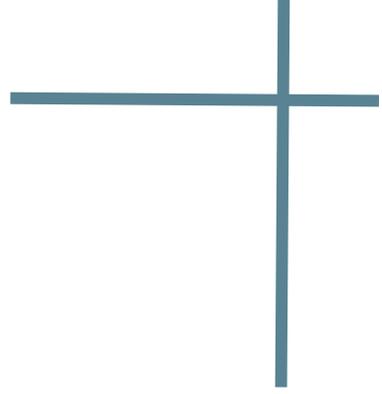


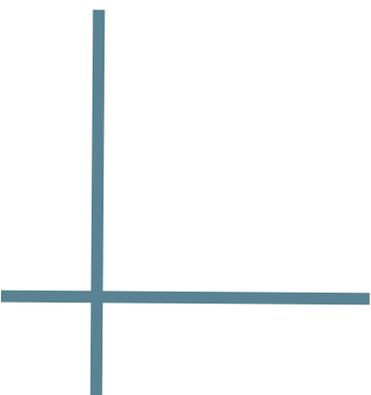
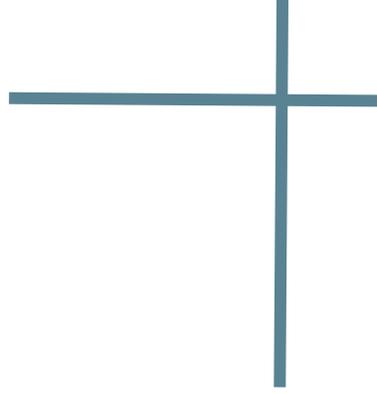


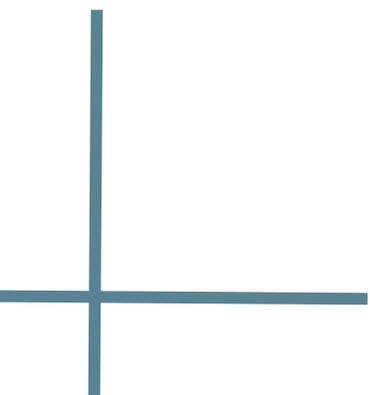
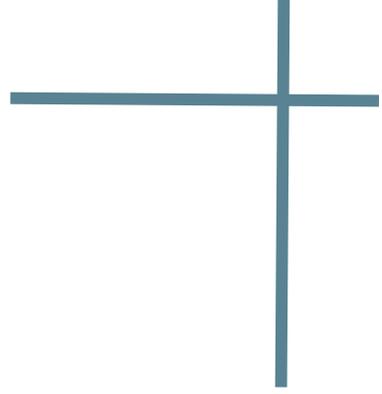


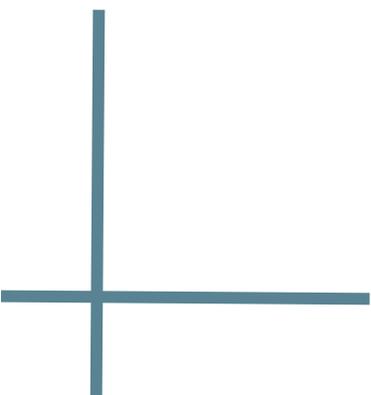
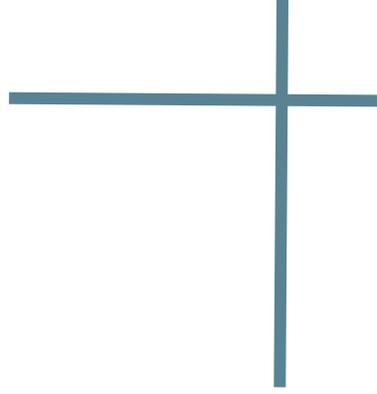












Section 9: Attachment E—Compliance Monitoring Checklist

Title VI Compliance Monitoring Checklist Federal Transit Administration Review Area

As the primary recipient of Federal Transit Administration (FTA) funding for the Phoenix/Mesa UZA, the city of Phoenix Public Transit Department is required to ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, or denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance. Per federal requirements, primary recipients and subgrantees must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

Title VI Compliance Monitoring Checklist—To be utilized in the performance of subgrantee oversight reviews

- System-wide service standards and system-wide service policies, whether existing or new (i.e., adopted by the provider since the last submission), for each specific fixed-route mode provided?
- A copy of the provider's Title VI notice to the public (and its location) that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded by Title VI?
- A copy of the provider's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form?
- A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the provider since the time of the last submission?
- A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.
- A copy of the provider's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance?
- For providers that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the provider, a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils?
- If the provider has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility?
- Additional information as specified in FTA C 4702.1B, Chapter IV?

[FTA C 4702.1B, Chap. III-2 and 3]

If the transit provider operates 50 or more fixed route vehicles in peak service, does the provider's Title VI program or program also contain:

- A demographic analysis of the service area, including demographic maps and charts completed since submission of the last Title VI Program that contains demographic information and service profiles?
- Data regarding customer demographics and travel patterns, collected from
- passenger surveys?
- Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the

Section 9: Attachment E — Compliance Monitoring Checklist

board’s or governing entity or official(s)’s consideration, awareness, and approval of the monitoring results?

- A description of the public engagement process for setting the “major service change policy” and disparate impact policy?
- A copy of board meeting minutes or a resolution demonstrating the board’s or governing entity or official(s)’s consideration, awareness, and approval of the major service change policy and disparate impact policy?
- Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission?
- A copy of board meeting minutes or a resolution demonstrating the board’s or governing entity or official(s)’s consideration, awareness, and approval of the equity analysis for any service or fare changes required by FTA C 4702.1B?

[FTA C 4702.1B, Chap. IV-3 and 4]

- Does the provider have a copy of public information on its Title VI obligations, including protections against discrimination? Has staff posted such information on the provider’s Web site; on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles; and in public areas of the provider’s office(s), including the reception desk, meeting rooms, etc.?

[FTA C 4702.1B, Chap. III-4]

Do the provider’s public notices include:

- A statement that the provider operates programs without regard to race, color, and national origin?
- A description of the procedures that members of the public should follow to request additional information on the provider’s nondiscrimination obligations?
- A description of the procedures that members of the public should follow to file a discrimination complaint against the provider?

[FTA C 4702.1B, Chap. III-4]

- Has the provider integrated the content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance into the established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the provider’s public participation activities)?

[FTA C 4702.1B, Chap. III-5]

- Has the provider taken reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP)?

[FTA C 4702.1B, Chap. III-6]

- Does the provider use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate?

[FTA C 4702.1B, Chap. III-7]

- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the provider?
- The frequency with which LEP persons come in contact with the program?

Section 9: Attachment E—Compliance Monitoring Checklist

- The nature and importance of the program, activity, or service provided by the provider to people's lives?
- Resources available to the provider and costs?
- In addition to the number or proportion of LEP persons served, does the provider's analysis identify, at a minimum:
- How LEP persons interact with the provider?
- Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group?
- The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?
- Whether LEP persons are underserved by the provider due to language barriers?

Does the provider's LEP Plan, at a minimum:

- Include the results of the Four Factor Analysis, including a description of the LEP population(s) served?
- Describe how the provider offers assistance services by language?
- Describe how the provider offers notices to LEP persons about the availability of language assistance?
- Describe how the provider monitors, evaluates, and updates the language access plan?
- Describe how the provider trains employees to provide timely and reasonable language assistance to LEP populations?
- Has the transit provider developed quantitative standards for all fixed route modes of operation for the indicators listed below:
- Vehicle load expressed, for example, as the ratio of passengers to the total number of seats on a vehicle expressed in terms of peak and off-peak times?
- Vehicle headway expressed, for example, for peak and off-peak service as an increment of time?
- An on-time performance standard with a defined level of performance, expressed as a percentage?
- Service availability as a general measure of the distribution of routes within the transit provider's service area?

[FTA C 4702.1B, Chap. IV-6]

- Has the transit provider developed a policy for each of the following service indicators:
- How amenities (e.g., benches, seats, shelters, signs) are distributed and sited, and the manner transit users have equal access to those amenities?
- The process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system?

[FTA C 4702.1B, Chap. IV-6 and 7]

If the transit provider operates 50 or more fixed route vehicles in peak service, does the provider collect and analyze racial and ethnic data as described below:

- Demographic and service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations?

Section 9: Attachment E — Compliance Monitoring Checklist

- A demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders?
- Fare usage by fare type among minority users and low-income users?
- Does the provider have a Title VI complaint form? Are the form and procedure for filing a complaint available on the provider's website? [FTA C 4702.1B, Chap. III-5]
- Does the provider notify the public that they may file discrimination complaints directly with the provider? [FTA C 4702.1B, Chap. III-5]
- Are the provider's notices detailing a recipient's Title VI obligations and complaint procedures translated into languages other than English, as needed, and consistent with the DOT LEP Guidance and the recipient's language assistance plan? [FTA C 4702.1B, Chap. III-4]
- Has the provider prepared and maintained a list of alleged discrimination on the basis of race, color, or national origin? [FTA C 4702.1B, Chap. III-5]
- Does the list include: [FTA C 4702.1B, Chap. III-5]
- Active investigations conducted by entities other than FTA?
- Lawsuits and complaints naming the provider?
- The date that the investigation, lawsuit, or complaint was filed?
- A summary of the allegation(s)?
- The status of the investigation, lawsuit, or complaint?
- Actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint?

If the transit provider operates 50 or more fixed route vehicles in peak service, does the provider monitor the performance of their transit system relative to system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years using the following method:

- Select a sample of minority and non-minority routes from all modes of service provided, e.g., local bus, bus rapid transit, light rail, etc.?
- Assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies?
- Compare the transit service observed in the assessment to the transit provider's established service policies and standards?
- Analyze why any discrepancies exist, and take steps to reduce the potential effects?
- Evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner route in the sample for each of the transit provider's service standards and service policies?
- Develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities?
- Brief and obtain approval from the transit providers' policymaking officials, generally the board of directors or appropriate governing entity responsible for policy decisions regarding the results of the monitoring program?

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- Submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board’s or governing entity or official(s)’s consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI Program?

[FTA C 4702.1B, Chap. IV-9 and 10]

If the transit provider operates 50 or more fixed route vehicles in peak service, does the provider:

- Conduct a service equity analysis for those service changes that meet or exceed the transit provider’s “major service change policy”?
- Define and analyze the change between the existing and proposed service levels that would be deemed significant?
- Establish a threshold for determining when statistically significant disparity occurs, (maybe) as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations?
- Engage the public in the decision making process to develop the major service change policy and disparate impact policy?
- Describe the dataset(s) the transit provider will use in the service equity analysis and describe what techniques and/or technologies were used to collect the data?
- Evaluate the impacts of proposed service changes on minority populations using the framework in FTA C 4702.1B, Chap. IV-14 thru IV-16?
- Evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes?
- Evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations?
- Analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change?
- Evaluate the impacts of their proposed fare changes (either increases or decreases) on minority and low-income populations separately, using the framework in FTA C 4702.1B, Chap. IV-20 and IV-21?

[FTA C 4702.1B, Chap. IV-10 thru IV-21]

If the transit provider operates fewer than 50 fixed route vehicles in peak service, has each analytical assessment been adequate enough to evaluate the possible occurrence of any disproportionately high and adverse effects on minority as well as on low-income riders? [FTA Circular 4702.1B, Chap. IV-11 and IV-21]

If the provider determines that a disparate impact exists for a proposed fare change, does the provider explain how that change meets a substantial need that is in the public interest? Also, does the provider explain how alternative strategies would have more severe adverse effects than the preferred alternative? [Title VI Service and Fare Equity Analysis Questionnaire]