Title VI Implementation Plan

February 2022 – January 2025

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Title VI Policy Statement

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

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

When City of Goodyear/Valley Metro distributes Federal-aid funds to another entity/person, City of Goodyear/Valley Metro will ensure all subrecipients fully comply with City of Goodyear/Valley Metro Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to Christine McMurdy, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Julie Karins, City Manager

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI
CITY OF GOODYEAR/VALLEY METRO

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

For more information on the City of Goodyear/Valley Metro's civil rights program, and the procedures to file a complaint, contact Christine McMurdy (623) 882-7806, (TTY (623) 932-6500); email Christine.McMurdy@goodyearaz.gov; or visit our administrative office at Goodyear Engineering Department, 14455 W. Van Buren Street, Suite D, Goodyear, AZ 85338. For more information, visit https://www.goodyearaz.gov/government/departments/engineering-development-services/engineering/transit

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

If information is needed in another language, contact 1-800-752-6906. Para información en Español llame: Juana Garay, 623-932-3004.

The above notice is posted in the following locations:
City of Goodyear Civic Hall, 1900 N. Civic Square, Goodyear, AZ 85395
City of Goodyear Park and Ride, 13183 W. Cornerstone Blvd., Goodyear, AZ 85338
Georgia T. Lord Library, 1900 N. Civic Square, Goodyear, AZ 85395

This notice is posted online at
https://www.goodyearaz.gov/government/departments/engineering-development-services/engineering/transit

Title VI Notice to the Public -Spanish

Aviso al Público Sobre los Derechos Bajo el Título VI
City of Goodyear/Valley Metro

City of Goodyear/Valley Metro *(y sus subcontratistas, si cualquiera)* asegura complir con el Título VI de la Ley de los Derechos Civiles de 1964. El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la City of Goodyear/Valley Metro's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Christine McMurdy, (TTY (623) 932-6500); o visite nuestra oficina administrativa en City of Goodyear Engineering Department 14455 W. Van Buren Street, Suite D, Goodyear, AZ 85338. Para obtener más información, visite https://www.goodyearaz.gov/government/departments/engineering-development-services/engineering/transit

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

Este Aviso se public el los siguientes lugares:
City of Goodyear Civic Hall, 1900 N. Civic Square, Goodyear, AZ 85395
City of Goodyear Park and Ride, 13183 W. Cornerstone Blvd., Goodyear, AZ 85338
Georgia T. Lord Library, 1900 N. Civic Square, Goodyear, AZ 85395

Este aviso esta publicado en línea en
https://www.goodyearaz.gov/government/departments/engineering-development-services/engineering/transit

Title VI Complaint Procedures

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 which requires 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."

How do I file a complaint?

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any Valley Metro or City of Phoenix service, program or activity, and believes the discrimination is based upon race, color or national origin, may file a formal complaint with Valley Metro Customer Service or directly with the City of Phoenix. This antidiscrimination protection also extends to the activities and programs of Valley Metro's and City of Phoenix's third- party Transit Service Provider (TSP) contractors. Valley Metro and the City of Phoenix use the Customer Assistance System (CAS) to capture all complaints received for the regional transit system. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

To submit a complaint online, complete the online complaint form at the following link: www.valleymetro.org/form/title-vi-complaint-form

Complaints can also be submitted in writing using the Title VI complaint form, or by calling Customer Service at (602) 253-5000, TTY: (602) 251-2039. Completed and signed forms should be mailed to:

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

The compliant form is located on our website:
https://www.valleymetro.org/about/civil-rights

To file a complaint directly with the City of Phoenix:

Attention: Title VI Coordinator
City of Phoenix Public Transit Department 302 N.
1st Avenue, Suite 900
Phoenix, AZ 85003
Email: PHXTransitEO@phoenix.gov
Phones: (602) 262-7242
https://www.phoenix.gov/publictransit/title-vi-notice

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 representatives or by the City of Phoenix Title VI Coordinator will be documented and assigned to the appropriate Transit Service Provider (TSP) (operator or administrator of the service) responsible for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). The TSP has 30 days to investigate each complaint. If more information is needed to resolve the case, the TSP may contact the complainant and request additional information. Complainants must provide additional information within 10 days of the request or the complaint may be deemed undeterminable and will be administratively closed. Cases may also be administratively closed if a complainant informs Valley Metro or the City of Phoenix that they no longer wish to pursue the complaint. Requests to close a complaint can be requested by phone, email or in writing (see contact information above). Complaints may be administratively closed for non-responsiveness by the complainant.

Following the investigation, all complaints shall be concluded with a determination entered in the CAS system. The determination entry shall state the investigation determined the complaint was valid[1], invalid[2], or undeterminable[3]. If the investigation determines the alleged Title VI complaint violations of race, color or national origin discrimination are valid, a detailed corrective resolution to remedy the situation shall be provided to the complainant. If the investigation results determine there was no alleged Title VI discrimination based on race, color or national origin, the case will be closed. The complainant shall be notified of the investigation results in the manner identified (email or phone). A complainant can appeal the decision within 60 days of notification of the investigation results. Appeals must be submitted to Valley Metro or the City of Phoenix.

All Title VI complaints and investigations are reviewed by Valley Metro, the Customer Service Administrator (CSA), and City of Phoenix staff.

For more information on Valley Metro's Title VI Program and procedures by which to file a complaint, contact the Title VI Coordinator at (602) 322-4514.

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.

[1] Valid: fact based, binding, acceptable, enforceable

[2] Invalid: null and void, unacceptable, unenforceable

[3] Undeterminable: incapable of being decided, settled, or fixed; not determinable

Requesting Information

Note: To request information in alternative formats, please contact Customer Service at csr@valleymetro.org or phone: (602) 253-5000 or City of Phoenix (602) 262-7242, TTY:
(602) 251-2039

Tracking a Title VI Compliant

As complaints are received, they are logged into the CAS system. Within 24 to 48 hours of logging the complaint, Valley Metro CSA assigns the complaint to the appropriate TSP for investigation and documentation.

The TSP has 30 days to complete their investigation, including obtaining additional information needed from the complainant to investigate or to resolve the case. The investigator will follow the complaint process, and once the investigation is concluded, the case resolution will be documented in the CAS.

The CAS system is programmed to notify the CSA if a complaint has not been responded to within the required time frame. Upon system notification, the CSA will send out a reminder notice to the appropriate TSP that the case is not yet resolved or closed out.

Once the case has been resolved the complainant will receive a response in the manner identified.

Valley Metro and the City of Phoenix monitors the process monthly to ensure Title VI complaints are fully investigated, adequately documented, and that the complainant was responded to in the manner requested. Should an inaccuracy be found, Valley Metro and/or the City of Phoenix will work with CSA and the appropriate TSP to reopen the complaint for further investigation until resolution or completion.

Investigating a Title VI Complaint

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

STEP ONE: The TSP will review the complaint information entered into CAS by Valley Metro Customer Service staff. Any new issues identified during the investigation should also be documented in CAS.

STEP TWO: Interviews and collections of facts.

- TSP identifies respondents to interview, if needed.
- TSP interviews respondents identified and documents details from the interviews in CAS.
- Investigate every "issue" (stated in the "statement of issues noted in step one).
- Separate facts from opinions.

"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:

- Complainant
- Operator

- Radio/Dispatch/OCC reports
- Maintenance staff
- City Transit staff
- Witnesses
- Other transit employees

The TSP identified, collects, and reviews other information and/or documents that provide facts for the investigation. Any applicable information is to be documented in CAS. Documents to review can include:

- GPS tracking software and programs
- Maintenance records
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Route history
- Other documents deemed appropriate by the TSP

STEP THREE: TSP documents pertinent regulations, rules, policies, and procedures that apply to the investigation in CAS under the case number assigned.

Pertinent regulations, rules, policies, and procedures may include:

- Title VI requirements
- Company rules and procedures
- Valley Metro and City of Phoenix policies and service standards
- Contractual requirements

STEP FOUR: Complaint Determination.

- TSP compares each fact from "findings of fact" to the list of regulations, rules, etc.
- TSP makes a fact-based determination of alleged violation(s).

STEP FIVE: Description of resolution for each valid violation.

- TSP describes specific corrective actions for *each* violation found
- TSP documents follow-up action, if applicable
- TSP documents the complaint resolution in CAS

TSP Complaint Resolution(s):

- Must include specific complaint resolutions for each valid violation noted.
- Document a follow-up action plan, where applicable.
- If no valid violations are found, note policies, procedures, etc. reviewed during the investigation and with transit operator.
- Documented complaint information should always include staff initials, title, and dates.

Response to Customer

TSP will respond to the Customer in the manner identified and will document the response provided in CAS under the case number assigned.

¿Qué es el Título VI?

El Título VI es una sección del Decreto de los Derechos Civiles de 1964 que requiere que "ninguna persona en los Estados Unidos deberá, basándose en su raza, color u origen nacional, ser excluida de participar en, ser denegada de los beneficios de, o verse sujeta a discriminación bajo cualquier programa o actividad recibiendo asistencia financiera federal."

¿Cómo registro una queja?

Cualquier persona que crea que ha sido excluida de la participación en, se le hayan denegado los beneficios de, o de otra manera se haya visto sujeta a discriminación ilegal bajo cualquier servicio, programa o actividad de Valley Metro o de la Ciudad de Phoenix, y crea que la discriminación se basa en raza, color u origen nacional, puede registrar una queja formal con el Servicio al Cliente de Valley Metro o directamente con la Ciudad de Phoenix. Esta protección antidiscriminatoria también se extiende a las actividades y los programas de los contratistas terceros Proveedores de Servicios de Transporte (TSP por sus siglas en inglés) de Valley Metro y la Ciudad de Phoenix. Valley Metro y la Ciudad de Phoenix usan el Sistema de Asistencia al Cliente (CAS por sus siglas en inglés) para capturar todas las quejas recibidas por el sistema regional de transporte. Cualquier queja de este tipo debe registrarse dentro de los 180 días del presunto acto discriminatorio (o de la última vez que haya ocurrido).

Para enviar una queja en línea, llene la forma de quejas en línea en el siguiente enlace: www.valleymetro.org/form/title-vi-complaint-form

Las quejas también se pueden registrar por escrito usando la forma de quejas del Título VI, ó llamando a Servicio al Cliente al (602) 253-5000, TTY: (602) 251-2039. Las formas llenas y firmadas se deben enviar por correo postal a:

Regional Public Transportation Authority 4600
East Washington Street, Suite 101
Phoenix, AZ 85034
Correo electrónico: csr@valleymetro.org
Teléfono: (602) 253-5000
TTY: (602) 251-2039

La forma de la queja se encuentra en nuestro sitio web: https://www.valleymetro.org/about/civil-rights

Para registrar una queja directamente con la Ciudad de Phoenix:
Attention: Title VI Coordinator
City of Phoenix Public Transit Department 302
N. 1st Avenue, Suite 900
Phoenix, AZ 85003

Correo electrónico: PHXTransitEO@phoenix.gov Teléfono: (602) 262-7242 https://www.phoenix.gov/publictransit/title-vi-notice

Los individuos también pueden registrar quejas directamente con la Administración Federal de Transporte (FTA por sus siglas en inglés) dentro de un período de tiempo de 180 días:

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

Servicio al Cliente

Las quejas recibidas por los representantes de Servicio al Cliente de Valley Metro o por el Coordinador del Título VI de la Ciudad de Phoenix serán documentadas y asignadas al Proveedor de Servicios de Transporte (TSP por sus siglas en inglés) (operador o administrador del servicio) apropiado responsable de la investigación en conformidad con los estándares federales (28 CFR Parte 35 y Circular 4702.1B de la administración FTA). El proveedor TSP tiene 30 días para investigar cada queja. Si se necesita más información para resolver el caso, el proveedor TSP puede ponerse en contacto con el/la reclamante y solicitar información adicional. Los reclamantes deben proporcionar la información adicional dentro de los 10 días posteriores a la solicitud o la queja puede considerarse indeterminable y se cerrará administrativamente. Los casos también se pueden cerrar administrativamente si un/a reclamante informa a Valley Metro o a la Ciudad de Phoenix que ya no desea continuar con la queja. Las solicitudes para cerrar una queja se pueden hacer por teléfono, por correo electrónico o por escrito (vea arriba la información de contacto). Las quejas se pueden cerrar administrativamente si el/la reclamante falle en responder.

Después de la investigación, todas las quejas deberán ser concluidas con una determinación ingresada al sistema CAS. La entrada de la determinación deberá indicar que la investigación determinó que la queja era válida[1], inválida[2] ó indeterminable[3]. Si la investigación determina que las presuntas infracciones de la queja bajo el Título VI de discriminación por raza, color u origen nacional son válidas, se deberá proveer al/la reclamante una resolución correctiva detallada para remediar la situación. Si los resultados de la investigación determinan que no hubo una presunta discriminación bajo el Título VI basada en raza, color u origen nacional, el caso se cerrará. El/la reclamante deberá ser notificado/a de los resultados de la investigación en la forma identificada (correo electrónico o teléfono). Un/a reclamante puede apelar la decisión dentro de los 60 días siguientes a la notificación de los resultados de la investigación. Las apelaciones se deben enviar a Valley Metro o a la Ciudad de Phoenix.

[1] Válida: basadas en los hechos, vinculante, aceptable, ejecutable

[2] Inválida: nula e inválida, inaceptable, inejecutable

[3] Indeterminable: incapaz de llegar a una decisión, asentada, o solucionada; no es determinable

Todas las quejas e investigaciones del Título VI son revisadas por Valley Metro, el Administrador de Servicio al Cliente (CSA por sus siglas en inglés), y el personal de la Ciudad de Phoenix.

Para más información sobre el Programa del Título VI de Valley Metro y los procedimientos para registrar una queja, llame al Coordinador del Título VI al (602) 322- 4514.

Para más información sobre el Programa de Derechos Civiles de la Ciudad de Phoenix y los procedimientos para registrar una queja, llame al Coordinador del Título VI al(602) 262-7242.

Solicitando Información

Nota: Para solicitar información en formatos alternativos, por favor comuníquese con Servicio al Cliente en csr@valleymetro.org o por teléfono: (602) 253-5000 ó con la Ciudad de Phoenix al (602) 262-7242, TTY: (602) 251-2039

Rastreando Una Queja del Título VI

A medida que se van recibiendo las quejas, éstas son ingresadas al sistema CAS. Dentro de 24 a 48 horas de registrar la queja, el administrador CSA de Valley Metro asigna la queja al proveedor TSP apropiado para su investigación y documentación.

El proveedor TSP tiene 30 días para completar su investigación, incluyendo la obtención de la información adicional necesaria del/la reclamante para investigar o para resolver el caso. El investigador seguirá el proceso de quejas, y una vez que concluya la investigación, la resolución del caso se documentará en el sistema CAS.

El sistema CAS está programado para notificarle al administrador CSA si una queja no ha sido contestada dentro del plazo requerido. Tras la notificación del sistema, el administrador CSA enviará un aviso de recordatorio al proveedor TSP correspondiente de que el caso aún no se ha resuelto o cerrado.

Una vez resuelto el caso, el/la reclamante recibirá una respuesta en la forma identificada.

Valley Metro y la Ciudad de Phoenix monitorean el proceso mensualmente para asegurar que las quejas del Título VI se investiguen a fondo, se documenten adecuadamente, y se le conteste al/la respondiente de la manera solicitada. En caso de que se encuentre un error, Valley Metro y/o la Ciudad de Phoenix trabajarán con el administrador CSA y el proveedor TSP apropiado para volver a abrir la queja para una investigación adicional hasta su resolución o finalización.

Investigando Una Queja del Título VI

Cada reporte de investigación documentado del Título VI debe abordar cada uno de los "Cinco Pasos de Investigaciones Federales" que se encuentran en 28 CFR, Parte 35 y la Circular 4702.IA de la administración FTA. Los siete pasos son:

PASO UNO: El proveedor TSP revisará la información de la queja ingresada al sistema CAS por el personal de Servicio al Cliente de Valley Metro. Cualquier nuevo asunto identificado durante la investigación también se debe documentar en el sistema CAS.

PASO DOS: Entrevistas y recolecciones de los hechos.

- El proveedor TSP identifica a los respondientes a ser entrevistados, si es necesario.
- El proveedor TSP entrevista a los respondientes identificados y documenta los detalles de las entrevistas en el sistema CAS.
- Se investiga cada "asunto" (indicado en la declaración de asuntos que se indica en el paso uno).
- Se separan los hechos de las opiniones.

El/la "respondiente" no se limita al/la conductor/a del vehículo de transporte. El/la "respondiente" se define como *cualquier* fuente de información que pueda contribuir a la investigación, tal como:

- Reclamante
- Conductor/a
- Reportes de radio/despacho/OCC
- Personal de mantenimiento
- Personal de Transporte de la Ciudad
- Testigos
- Otros empleados de transporte

El proveedor TSP identifica, recopila, y revisa otra información y/o documentos que provean los hechos para la investigación. Cualquier información aplicable se debe documentar en el Sistema CAS. Los documentos por revisar pueden incluir:

- Software y programas de rastreo GPS
- Registros de mantenimiento
- Reportes de observador "Spotter"
- Grabaciones de video (cámara) y/o audio
- Tarjetas de cortesía
- Reportes de incidentes (supervisor, policía de transporte, inspectores de pasajes/seguridad)
- Historial de la ruta
- Otros documentos que el proveedor TSP considere apropiados

PASO TRES: El proveedor TSP documenta las regulaciones, reglas, normas, y procedimientos pertinentes que sean aplicables a la investigación en el sistema CAS bajo el número de caso asignado.

Las regulaciones, reglas, normas y procedimientos pertinentes pueden incluir:

- Requerimientos del Título VI
- Reglas y procedimientos de la compañía
- Normas y estándares de servicio de Valley Metro y la Ciudad de Phoenix
- Requerimientos contractuales

PASO CUATRO: Determinación de la queja.

- El proveedor TSP compara cada hecho de "hallazgos de hechos" con la lista de regulaciones, reglas, etc.
- El proveedor TSP hace una determinación basada en hechos de la/s presunta/s infracción/es.

PASO CINCO: Descripción de la resolución para cada infracción válida.

- El proveedor TSP describe las acciones correctivas específicas para *cada* infracción que haya sido encontrada
- El proveedor TSP documenta la acción de seguimiento, si es aplicable
- El proveedor TSP documenta la resolución de la queja en el sistema CAS

Resolución/es de Quejas del Proveedor TSP:

- Debe incluir resoluciones específicas a las quejas para cada infracción válida anotada.
- Documentar un plan de acción de seguimiento, cuando sea aplicable.
- Si no se encuentran infracciones válidas, anotar las normas, los procedimientos, etc. revisados durante la investigación y con el/la conductor/a de transporte.
- La información documentada de la queja siempre debe incluir las iniciales del personal, el título, y las fechas.

Respuesta al/la Cliente

El proveedor TSP le contestará al/la Cliente de la manera identificada y documentará la respuesta provista en el sistema CAS bajo el número de caso asignado.

Title VI Complaint Forms

TITLE VI COMPLAINT FORM

Any person who believes that he or she has been discriminated against by Valley Metro or City of Phoenix 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 via email at *csr@valleymetro.org*.

SECTION 1: CUSTOMER INFORMATION

First Name:_____ Last Name:_____
Address:_____
City:_____ State:_____ Zip:_____
Home Phone:_____ Cell Phone:_____
Email:_____ Preferred method of contact: ☐ Phone ☐ Email

SECTION 2: INCIDENT INFORMATION

Date of Incident:_____ Time of Incident:_____ ☐ AM ☐ PM City:_____
Incident Location:_____ Direction of Travel:_____
Route #:_____ Bus/Light Rail/Streetcar #:_____
Service Type: ☐ Local Bus ☐ Express/RAPID ☐ Circulator/Connector ☐ Light Rail ☐ Streetcar ☐ Dial-a-Ride
Operator Name:_____
Operator Description:_____
What was the discrimination based on *(Check allthat apply)*: ☐ Race ☐ Color ☐ National Origin ☐ Other_____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. You may also attach any written materials or other information relevant to your complaint.

Have you filed this complaint with the Federal Transit Administration (FTA)? ☐ Yes ☐ No
If yes, please provide information about a contact person at the FTA where the complaint was filed:
Name:_____ Title:_____
Address:_____ Phone:_____

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No
Signature and date required below:

Signature_____
Date_____

FORMA DE RECLAMACIÓN BAJO EL TÍTULO VI

Cualquier persona que crea que ha sido discriminada por Valley Metro o la Ciudad de Phoenix o por cualquiera de sus proveedores de servicios y cree que la discriminación fue basada en su raza, color u origen nacional, puede registrar una queja formal ante el Servicio al Cliente de Valley Metro.

Por favor provea la siguiente información para procesar su queja. Hay formatos e idiomas alternativos disponibles si se solicitan. Usted se puede comunicar con el Servicio al Cliente llamando al 602.253.5000 (TTY: 602.251.2039) o por correo electrónico a *csr@valleymetro.org*.

SECCIÓN 1: INFORMACIÓN DEL CLIENTE

Nombre:_____ Apellido:_____
Domicilio:_____
Ciudad:_____ Estado:_____ Código Postal:_____
Teléfono del Hogar:_____ Teléfono Celular:_____
Correo Electrónico:_____ Método preferido de contacto: ☐ Teléfono ☐ Correo Electrónico

SECCIÓN 2: INFORMACIÓN SOBRE EL INCIDENTE

Fecha del Incidente:_____ Hora del Incidente:_____ ☐ AM ☐ PM Ciudad:_____
Ubicación del Incidente:_____ Dirección del Viaje:_____
Ruta #:_____ Autobús/Tren Ligero/Tranvía #:_____
Tipo de Servicio ☐ Autobús Local ☐ Express/RAPID ☐ Circulador/Conector ☐ Tren Ligero ☐ Tranvía ☐ Dial-a-Ride
Nombre del/la Operador/a:_____
Descripción del/la Operador/a:_____
¿En qué se basó la discriminación? *(Marque todo lo que sea aplicable):*
☐ Raza ☐ Color ☐ Origen Nacional ☐ Otro_____

Explique lo más claramente posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si los conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use el reverso de esta forma. Usted también puede adjuntar cualquier material por escrito u otra información relevante a su queja.

¿Ha usted registrado esta queja ante la Administración Federal de Transporte (FTA por sus siglas en inglés)? ☐ Sí ☐ No
Si contestó Sí, por favor provea información sobre una persona de contacto en la administración FTA donde se registró la queja:
Nombre:_____ Título:_____
Domicilio:_____ Teléfono:_____

¿Ha usted registrado previamente una queja bajo el Título VI ante esta agencia? ☐ Sí ☐ No
Firma y fecha requeridas abajo:

Firma_____
Fecha_____

City of Phoenix | VALLEY METRO

Title VI Investigations, Complaints, and Lawsuits

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

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

X **The City of Goodyear has not had any Title VI complaints, investigations, or lawsuits in 2018-2021**.

CITY OF GOODYEAR/VALLEY METRO
Public Participation Plan

The City of Goodyear/Valley Metro is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

The City of Goodyear has adopted the Valley Metro Public Participation Plan. The City of Goodyear has not conducted any transit-related public outreach between the years of 2018 and 2022. Valley Metro conducts all outreach for transit service changes on behalf of the City of Goodyear. At any time an item needs addressing, public meetings will be conducted at a Goodyear public venue(s) space on an as needed basis

In the upcoming year the City of Goodyear anticipates that its transit-related programs and activities will change during 2022-2023. When the proposed changes occur, the City will utilize Valley Metro's Title VI Public Participation Plan.

Public Meetings:

(1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

(2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.

(3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

Valley Metro Public Participation Plan 2021
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 inclusion of the public throughout the Phoenix metropolitan community in accordance 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 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[1] (Circular).

Involving the public in Valley Metro practices and decision-making processes provides helpful information to improve the transit system to 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 transit information 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.

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

Valley Metro currently practices all these strategies, in compliance with federal regulations, so that minority, low-income and LEP populations have ready access to information and 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.

Meeting Planning: For planning efforts, including fare and service changes, public meeting locations are held at a centralized location near the affected route or project area 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 Arizona* (Hispanic community). Press releases are also sent to these media sources regarding fare changes, service changes and other programs. All printed materials are available in English and Spanish and translated, as requested, in any other languages.

Rider Satisfaction Survey: A key participation effort, the Rider Satisfaction Survey, is conducted approximately every two years. This survey is administered on transit routes across the region, reaching transit riders living 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.

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

Website: Information including meeting announcements, meeting materials and other program information is available on *valleymetro.org* 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. Using public involvement, media outlets and print or electronic materials, Valley Metro disseminates information regarding planning efforts. These efforts include the activities described below.

A full list of potential outreach methods is found in Appendix A.

Common Best Practices:

- Public meetings, hearings and open houses are held regularly at community familiar and centralized 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 to best engage the targeted population.

- Valley Metro has staff available at public meetings, hearings, events and open houses to answer questions and receive comments in both English and Spanish. Valley Metro also uses court reporters to record verbal comments at public hearings.

- Outreach for biannual service changes and other programs are conducted at or near the affected area— for example, along an affected bus route or at an affected transfer location— thus targeting the population that may be most affected by proposed changes to service or routes. Often, these efforts are also executed at transit stops, 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 affected.

- 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 as established by the project team. A full list of potential outreach methods is found in Appendix A.

- Valley Metro publishes advertisements of any proposed service or fare change in minority publications 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. Depending on the level of impact, a formal media/communications plan can be developed to coordinate overall messaging across multiple stakeholders.

- Valley Metro offers online participation via social media, webinar and email input as an alternative opportunity for comment. Online meetings or hearings are recorded and uploaded to the Valley Metro YouTube channel and/or website.

- Major surveying efforts are conducted in both English and Spanish to ensure that the data collected is representative of the public.

- Valley Metro Customer Service is multilingual.

- All comments are documented in a centralized database. 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 acting upon proposed service changes.

A public hearing is a formal presentation to the public on specific proposal or subject. Public testimony is recorded into the official record. The rules governing a public hearing are more formal than that of a public meeting, where a variety of tools and techniques may be used to gather feedback from the public. A public

hearing may take place in-person, via teleconference, or online. Public comment must be recorded and transcribed, either via electronic means or a court reporter.

A public hearing is required during:

- The development of an Environmental Impact statement.
- A Major Service Change, as defined by the Major Service Change & Service Equity Policy.

Conclusion

Valley Metro conducts public outreach throughout the year to involve the 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 print and digital materials across multiple channels and providing opportunities via phone and online to share or collect input, Valley Metro ensures that outreach efforts include opportunities for minority, low-income and LEP populations who may be impacted by the activity or transit planning process are integrated into the decision-making process. Valley Metro will continue to involve all communities to be inclusive of all populations throughout the metropolitan 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.

Appendix A

Valley Metro reviews public outreach needs with the project/initiative team as part of the initial development of the designated Public Involvement Plan. Major tactics are outlined to develop the overall timeline. Depending upon the scope of the project, program or announcement, public participation methods are customized to ensure that the public is involved in the decision-making process.

A list of commonly used outreach tools, as well as their definition and associated Valley Metro standard of best practice, is listed below.

Outreach Tool	Definition and Best Practices
Public Hearing	A formal meeting with a set agenda during which a presentation is given, and public testimony/feedback is heard and recorded. Can take place in-person, via teleconference, or online. For public hearings, adequate notice to the public is defined as a minimum of 30 days to the hearing date. A hearing is advertised with an appropriate outreach tactic at least four times within 30 days of the meeting date. Public comment must be recorded and transcribed, either via electronic means or via a court reporter.
Public Meeting	A meeting during which material is presented and public comment is heard and recorded. The material may be offered via a presentation, workshop or "open house." Can take place in-person, via teleconference, or as a webinar online. For public meetings, adequate notice to the public is defined as a minimum of 15-days prior to the meeting date. A meeting is advertised at least twice via an appropriate outreach tactic within 15 days of the meeting date.
Display Ads in Print Media	A paid advertisement in the newspapers or other print media to alert readers about an upcoming event or action.
Website/Online Social Media	Information on projects or initiatives located on the Valley Metro website or Valley Metro social channels (Instagram, Facebook, Twitter)
Stakeholder meetings	Information provided to local, targeted individuals or groups particularly affected by project. The presentation may be formal, a workshop or in "open house" style. Typically, stakeholder meetings are invitation-only and so do not need to be publicly advertised beforehand. Can take place in-person, via teleconference, or as a webinar online.

Mobile Device Alerts	Electronic push notifications to alert customers to important information on projects or service changes via Valley Metro owned mobile apps (AlertVM, ConstructVM, mobile fare app).
Signs	Signs on buses, bus stop locations, transit centers or other locations frequented by stakeholders. This includes temporary signs, A-frames or kiosk posters.
Rider Alerts	Notifications regarding immediate rider information on impacts to frequency, routing or schedule. Rider Alerts may be web based, printed on signs and/or submitted as a memo to Customer Service & Operations.
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input.
Surveys	A list of questions to solicit opinions or preferences by a selected group of individuals. The survey mechanism may be electronic and/or in-person. The survey population may be intercepted or self-selected. For surveys, the feedback collection period is defined as a minimum of 15 days.
Static Display	Table or sign display at a trafficked event or area in an identified area where a targeted stakeholder group may be present. The display may be manned or unmanned and will have specific information on the project/initiative. This may also include a feedback mechanism, such as comment cards.
Door Hanger/Flyer Canvassing	Print notice distributed to local businesses and residents in project/affected area.
E-mail/E-blast	Digital messaging to an established Valley Metro email list. Stakeholders may opt-in or out of this list based on their needs.

CITY OF GOODYEAR/VALLEY METRO

Limited English Proficiency Plan

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

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City

of Goodyear/Valley Metro's extent of obligation to provide LEP services, the City of Goodyear/Valley Metro undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

1) The number or proportion of LEP persons eligible in the City of Goodyear/Valley Metro service area who may be served or likely to encounter by the City of Goodyear/Valley Metro's program, activities, or services;

2) The frequency with which LEP individuals come in contact with an City of Goodyear/Valley Metro services;

3) The nature and importance of the program, activities or services provided by the City of Goodyear/Valley Metro to the LEP population; and

4) The resources available to the City of Goodyear/Valley Metro and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

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

Safe Harbor Provision

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

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

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

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

Language Assistance Plan

Title VI Program

July 2021

1.0 INTRODUCTION

In 1993, the Valley Metro Regional Public Transportation Authority (RPTA) board adopted the name Valley Metro as the identity for the regional transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the Valley-wide transit system that serves more than 64 million riders annually. Valley Metro provides fixed route bus service, light rail service, streetcar service (open in late 2021) and complementary ADA paratransit service across the region. Valley Metro provides services with, and distributes transit funds from the countywide transit sales tax to its member agencies including Maricopa County and the cities of Tempe, Mesa, Glendale, Phoenix, Buckeye, Tolleson, Wickenburg, Surprise, Peoria, Chandler, Gilbert, El Mirage, Avondale, Goodyear, Scottsdale, Fountain Hills, and Youngtown. For the most part, Valley Metro and its member agencies use private service providers for the operation of bus, light rail and paratransit services. The Cities of Glendale, Scottsdale, Peoria and Phoenix contract some of their service directly to service providers.

Currently, fixed-route transit service in the metropolitan area is operated by the City of Phoenix, and Valley Metro, Scottsdale and Glendale. There is a total of 893 fixed-route vehicles and 50 light rail vehicles operating in the region. Of these vehicles, 95 are circulators.

The regional transit system has 61 local bus routes that consist of the following: 45 local bus routes, 15 key local bus routes and 1 limited-stop peak route. The region also has 20 Express/RAPID routes, 21 community circulator routes, 1 rural connector route and 1 light rail system. Valley Metro customers made over 64,000,000 boardings during fiscal year 2019.

Seven Four regional entities in the region provide Dial-a-Ride service for seniors and persons with disabilities, as well as Americans with Disabilities Act (ADA) paratransit service for those who are unable to use fixed-route bus service. Annual regional ridership for ADA paratransit and regional ridership for non-ADA general Dial-a-Ride was 1,134,014.

In addition, Valley Metro's Commute Solutions team supports Valley organizations in the mandatory Maricopa County Travel Reduction Program. Toward that goal, the team provides a multipurpose platform at www.ShareTheRide.com that allows commuters to search for carpools, vanpools, transit and bike buddies. In addition to providing this multimodal support, it provides pollution and commute information. In an ongoing effort to educate, the team also provides online training, informational webinars, and special promotions for the general public and transportation coordinators.

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

1.1 Regulatory Guidance

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

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," issued on August 11, 2000, directs each federal agency to publish guidance for its respective recipients to assist with its obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Providing English only services may constitute national origin discrimination in violation of Title VI and its implementing regulations.

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

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

1.2 Four Factor Analysis

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

The four factor analysis involves the following:

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

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

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

Factor 1 assesses the number and proportion of persons with limited English speaking proficiency likely to be encountered within the region's service area, which is defined as a three-quarter mile radial buffer around all fixed route services and a three-mile buffer around park-and-ride and transit facilities for express bus service. The LEP population is those individuals who reported to the Census Bureau that they speak English "less than very well."

2.1 Evaluation Methods and Data Source

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. The presence of LEP populations in the regional service area was determined by analyzing the U.S. Census Bureau, 2019 American Community Survey (ACS) 5-year Sample. The 2019 ACS data were used because the 2020 decennial census, at the time of this update, was not available.

2.2 LEP Population Identification

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

2.3 American Community Survey

The American Community Survey (ACS) is a continuous nationwide survey conducted monthly by the U.S. Census Bureau to produce annually updated estimates for the same small area (census tracts and block groups) formerly surveyed through the decennial census long-form survey. It is intended to measure changing socioeconomic characteristics and conditions of the population on a recurring basis. It is important to note that the ACS does not provide official counts of the population between each decennial census, but instead provides weighted population estimates. This analysis uses the 2019 ACS 5-year data (2015 to 2019).

ACS data include the number of person's ages five and above who self-identified their ability to speak English as "very well", "well", "not well", and "not at all". **Figure 1** depicts Valley Metro's service area. **Table 1** shows the number of LEP people within Valley Metro's service area in comparison to Maricopa County. There are over 4 million residents in Maricopa County, and 3.5 million reside within Valley Metro's service area. The incidence of LEP persons within Valley Metro's service area is slightly higher than in the county. 8.7 percent of residents in Maricopa County speak English less than "very well", while 9.6 percent of residents within Valley Metro's service area speak English less than "very well".

FIGURE 1: VALLEY METRO SERVICE AREA

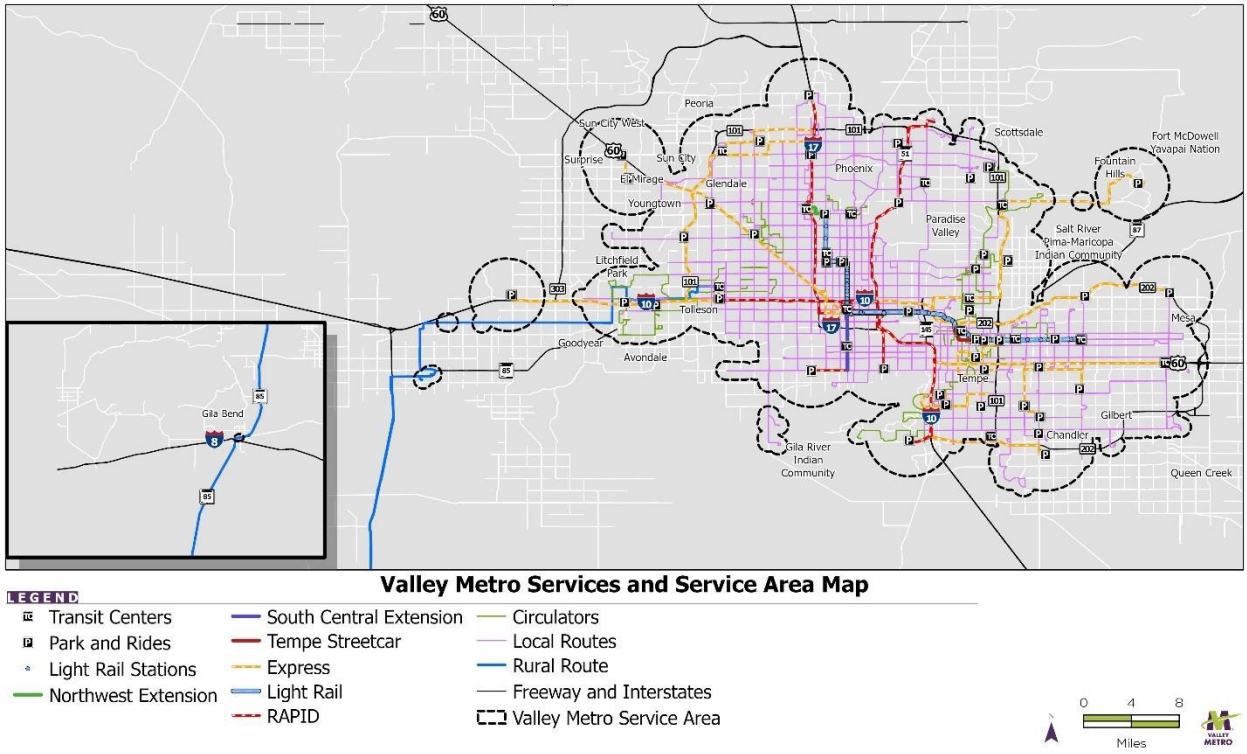


TABLE 1: 2019 ACS DATA, BY LOCATION

County or Area	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than Very Well
			Very Well	Less than Very Well	
Maricopa County	4,050,301	2,957,214	737,917	355,170	8.7
Census Tracts within service area[a]	3,530,687	2,501,110	690,264	339,349	9.6

[a] Service Area is defined as a ¾ -mile buffer within local fixed route service and a 3-mile buffer within park-and-ride and transit facilities for express bus service

Table 2 shows English proficiency for the census tracts within the service area population age five years and above by the linguistic categories identified by the U.S. Census Bureau. This includes English, Spanish, Indo-European, Asian or Pacific Islander, and all other languages. The 2019 ACS data show the population self-identified as speaking English less than "very well" was predominantly the Spanish language group, encompassing 261,287 people, or 7.4 percent of the total population age five years and over. Indo-European, Asian or Pacific Islander, and All Other Languages groups account for 78,026 people, or 2.2 percent of the population. Of all those speaking English less than "very well", the Spanish group makes up 77 percent of the total population over age five with limited English proficiency.

TABLE 2: 2019 ACS DATA, BY LANGUAGE CATEGORY

Language Category	Total Population Age 5 and Over	Speaks English				Percentage Less than Very Well
		Very Well	Well	Not Well	Not At All	
Total	3,530,687	690,264	148,748	119,838	70,727	9.6
English	2,501,110	—	—	—	—	0.0
Spanish	788,929	527,642	100,211	97,690	63,386	7.4
Asian or Pacific Islander	95,307	57,621	22,331	11,922	3,433	1.1
Indo-European	88,411	66,861	14,813	4,981	1,756	0.6
All other languages	56,930	38,140	11,393	5,245	2,152	0.5

The 2019 ACS data also provide information on linguistically isolated households: "A linguistically isolated household is one in which no member 14 years old and over (1) speaks only English and (2) speaks a non-English language and speaks English 'very well.' In other words, all members 14 years old and over have at least some difficulty with English" (ACS 2019). In total, the 2019 ACS data identified 1,356,898 households to be linguistically isolated. The entire membership of a linguistically isolated household would be considered LEP. **Table 3** details those data for linguistically isolated and non-linguistically isolated households by language category within the service area.

TABLE 3: 2019 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

Language Category	Total Households	Isolated Households	Non-isolated Households	Percentage Isolated Households
Census tracts in service area	1,356,898	57,919	330,557	4.3
English	968,422	—	—	—
Spanish	276,605	41,125	235,480	3.0
Asian or Pacific Islander	41,622	7,956	33,666	0.6
Indo-European	46,362	4,648	41,714	0.3
All other languages	23,887	4,190	19,697	0.3

Within the transit service area, 4.2 percent of households are considered linguistically isolated. Again, these are predominantly Spanish households, making up three percent of the total. Remaining languages make up 1.2 percent of households that are classified as linguistically isolated.

Figure 2 shows concentrations of linguistically isolated households in census tracts within the service area. Most areas throughout the region are mixed, although a few pockets of census blocks have concentrations of linguistically isolated households, thus identified as persons with limited English proficiency.

FIGURE 2: CENSUS TRACTS WITH LINGUISTICALLY ISOLATED HOUSEHOLDS

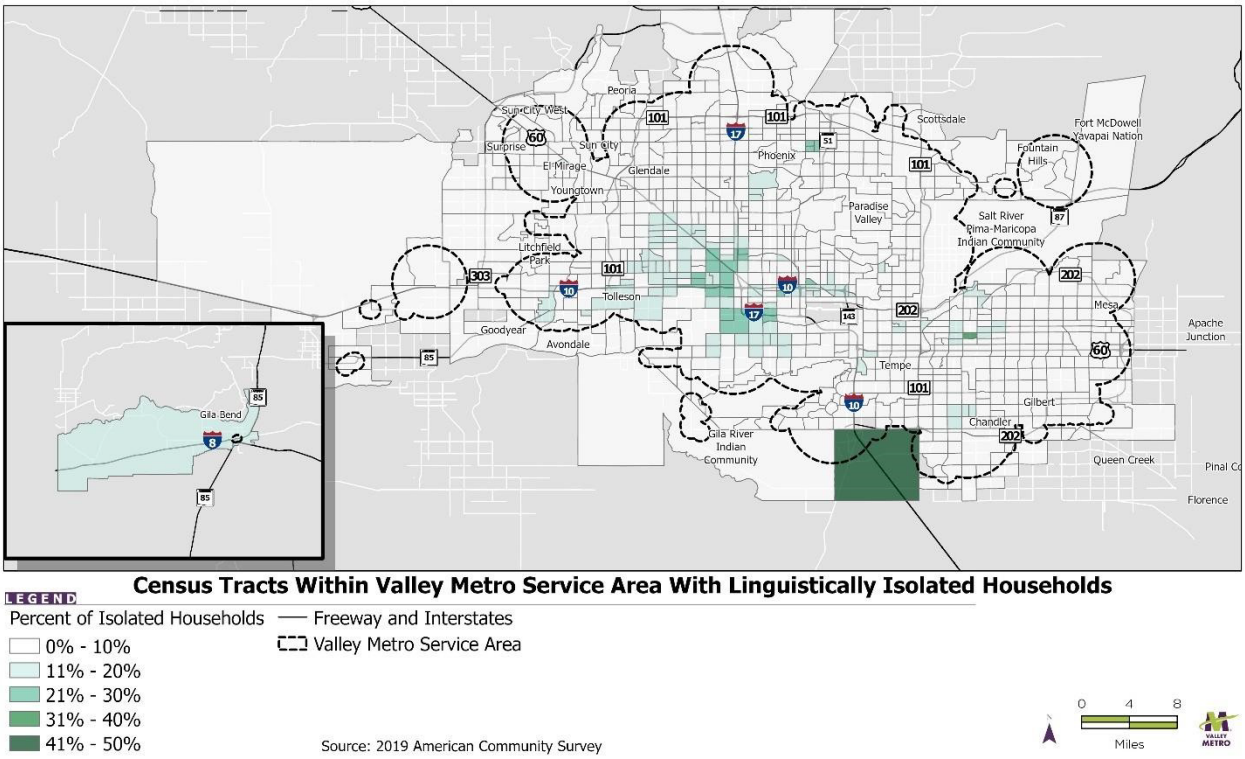
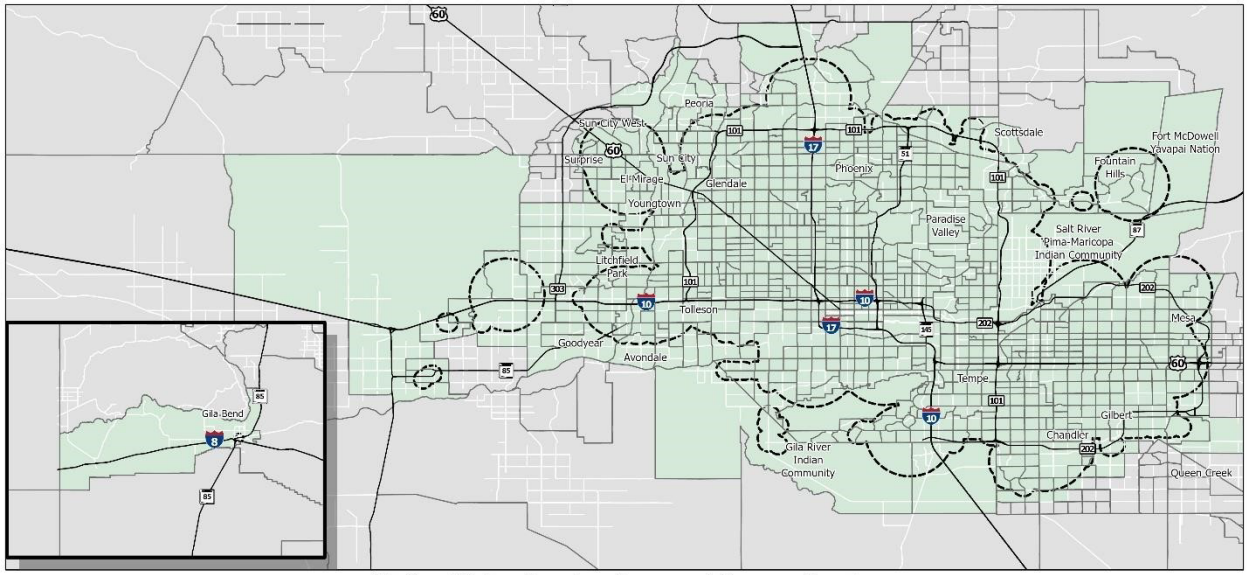


Figure 3 shows the ACS 2019 census tracts within the three-quarter mile buffer of local fixed route service and a three-mile buffer around park-and-ride and transit facilities for express bus service. Census tracts encapsulated within this area are included in the estimates, although they may not be within one-quarter mile of a fixed route.

FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



The 2019 ACS data show 12 languages or language groups with 1,000 or more LEP persons. Only one LEP population exceeds both the 1,000 or more individuals and the five percent of the total population of persons eligible to be served or likely encountered. **Table 4** shows the populations that meet either of these thresholds using ACS 2019 population by language and ability, sorted by percentage of LEP population.

Within the service area, the majority of the 2019 LEP populations is the Spanish speaking population; this is the only language group to exceed both 1,000 individuals and five percent of the LEP population. The Spanish LEP population consists of 261,287 individuals within the service area. The Other Indo-European, Mandarin Chinese, and Other and Unspecified speaking populations followed with 3.86 percent, 3.42 percent, and 3.33 percent respectively. The Vietnamese, Other Asian and Pacific Island and Arabic speaking populations follow with 2.87 percent, 2.85 percent and 2.27 percent, respectively. This is followed by Russian and Filipino with 1.63 percent and 1.28 percent, respectively, and then by Korean (0.8 percent), French (0.6 percent) and German (0.3 percent).

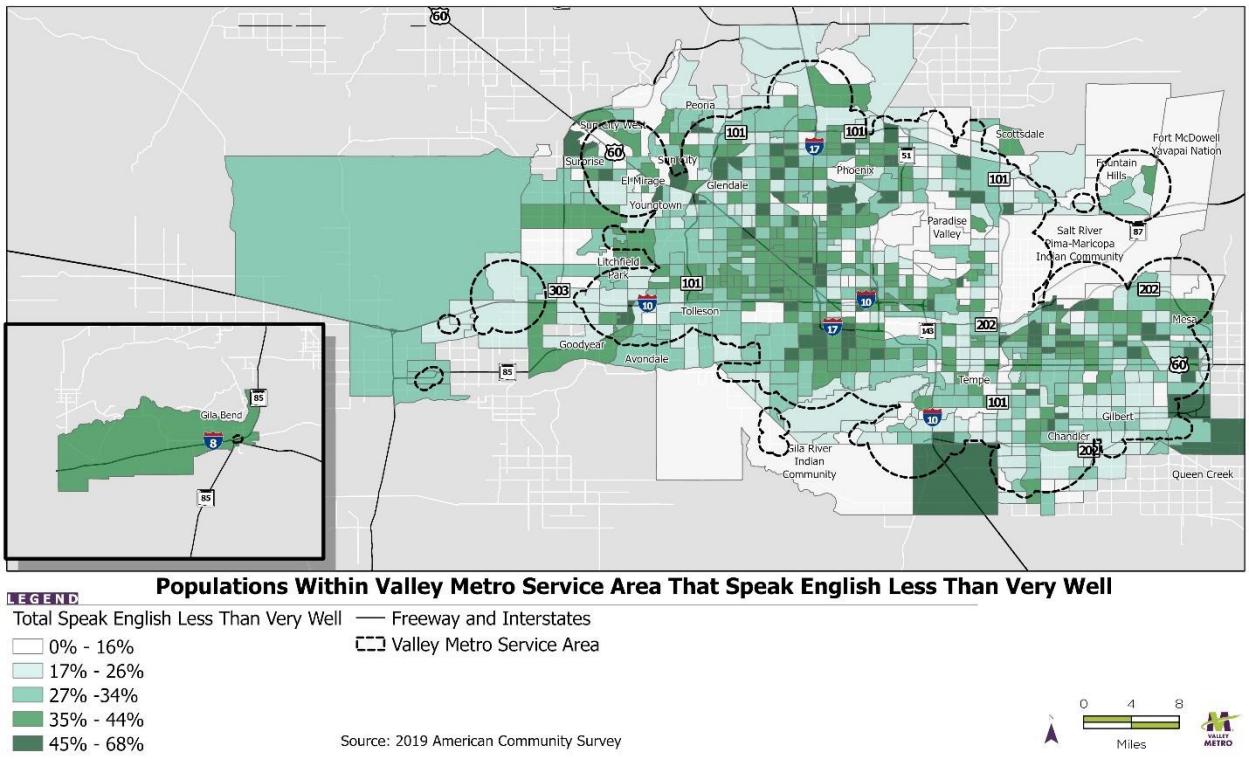
TABLE 4: 2019 ACS DATA, BY LANGUAGE WITHIN ONE-HALF MILE OF FIXED ROUTE SERVICE

Language	Speak English		Percentage of

	Less Than Very Well	Very Well	Total Population	Language LEP of Total LEP Population
All languages	335,714	—	—	100
Spanish	261,287	527,642	788,929	77.83
French, Haitian or Cajun	2,115	7,666	9,781	0.63
German	988	9,765	10,753	0.29
Russian, Polish or Other Slavic	5,484	12,517	18,001	1.63
Other Indo-European languages	12,963	36,913	49,876	3.86
Korean	2,694	2,856	5,550	0.80
Mandarin Chinese	11,471	11,965	23,436	3.42
Vietnamese	9,649	6,936	16,585	2.87
Filipino	4,292	12,356	16,648	1.28
Other Asian Pacific Island	9,580	23,508	33,088	2.85
Arabic	7,623	11,563	19,186	2.27
Other and unspecified languages	11,167	26,577	37,744	3.33

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

FIGURE 4: POPULATION SPEAKING ENGLISH "LESS THAN VERY WELL"



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

The first step of the four-factor LEP needs assessment revealed that the largest language group is overwhelmingly Spanish, followed by the ACS language categories of Other Indo-European, Mandarin Chinese and Other and Unspecified. Factor 2 is intended to assess the frequency with which LEP persons interact with Valley Metro programs, activities or services. The USDOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005) advises that:

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

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

3.1 Evaluation Methods and Data Sources

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

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

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

3.2 Frequency of Contact Analyses

Valley Metro recognizes the value of providing convenient and efficient information to transit riders. Understanding how often LEP persons are using services will assist in serving customers better in the future with quality services, programs and activities.

Transit Employee Surveys

During September and October of 2020, a voluntary survey of customer service and transit employees was conducted regarding interaction with LEP persons and languages spoken. A copy of the survey instrument can be found in **Appendix A**. Valley Metro Customer Service Representatives provide passenger assistance most commonly through email, but also by phone. Several Customer Service Representatives that are stationed at transit passenger facilities[2] to provide assistance to passengers. Bus operators at multiple locations were also surveyed. Employees surveyed were based at one of the following locations:

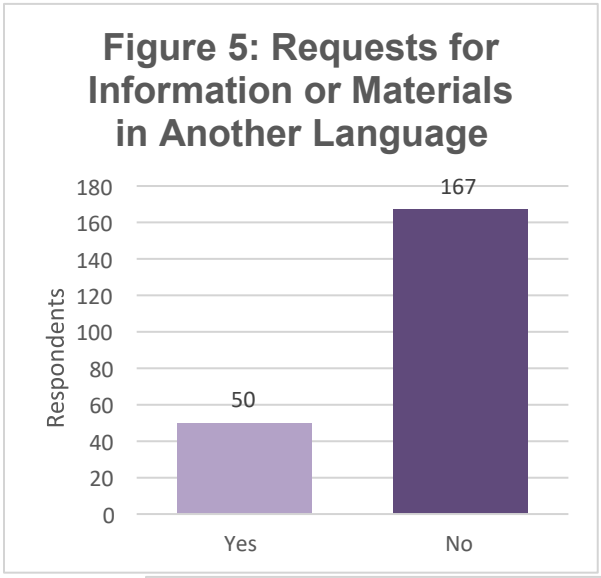
- Customer Service and Mobility Center
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center
- East Valley Bus Operations and Maintenance Facility
- Mesa Bus Operations and Maintenance Facility
- Phoenix Bus Operations and Maintenance Facility

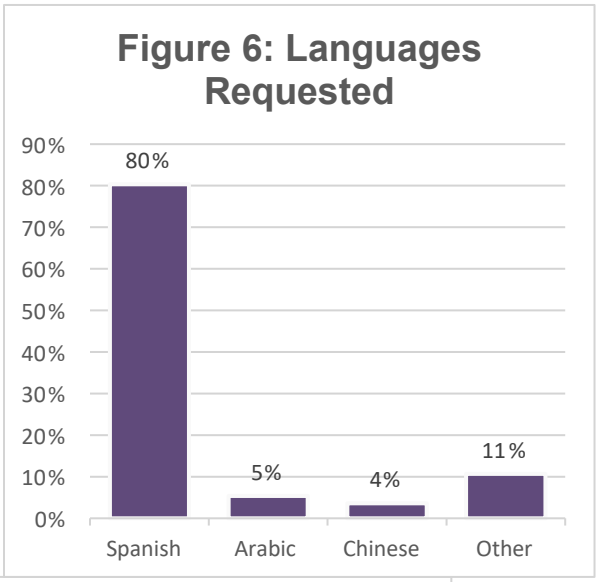
In total, 218 respondents provided information about their experiences. Approximately 80 percent of those surveyed were transit operators. When asked if staff have had any requests for materials in another language in the past two years, 23 percent responded yes; see **Figure 5**. Of these, most interpretation or translation requests were for Spanish. All but two of the locations received translation requests in the past two years: Sunnyslope Transit Center and Metrocenter Transit Center.

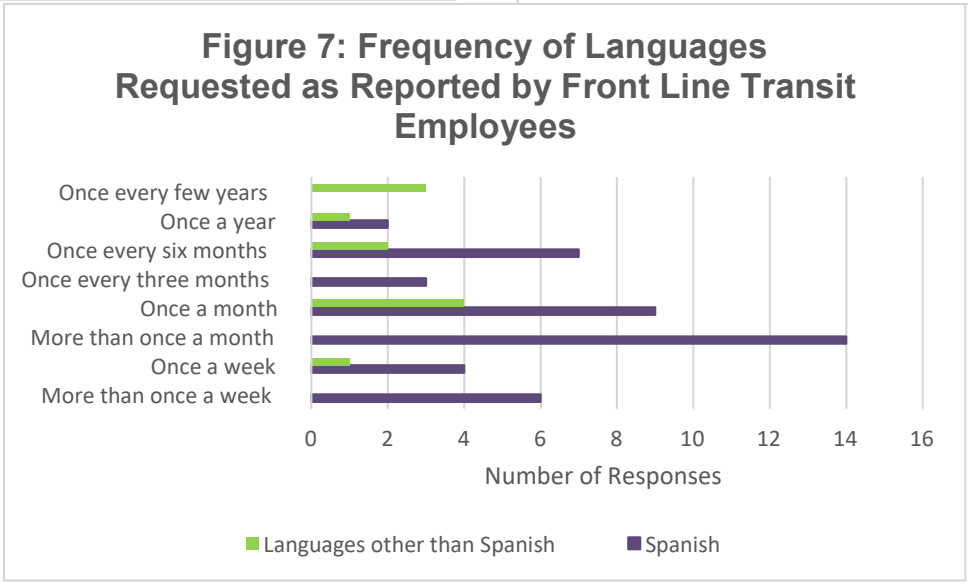
[2] Facilities operated by the City of Phoenix or City of Tempe

Languages requested were predominantly Spanish (80 percent) followed by Arabic (5 percent) and Chinese (4 percent). Other languages made up 11 percent of requests. These languages, which were each requested only once, were French, Russian, German, Farsi, Hindi and Swahili. See **Figure 6** for a graphic representation of the languages requested.

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







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

Customer Service Interactive Voice Response Call Log

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

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

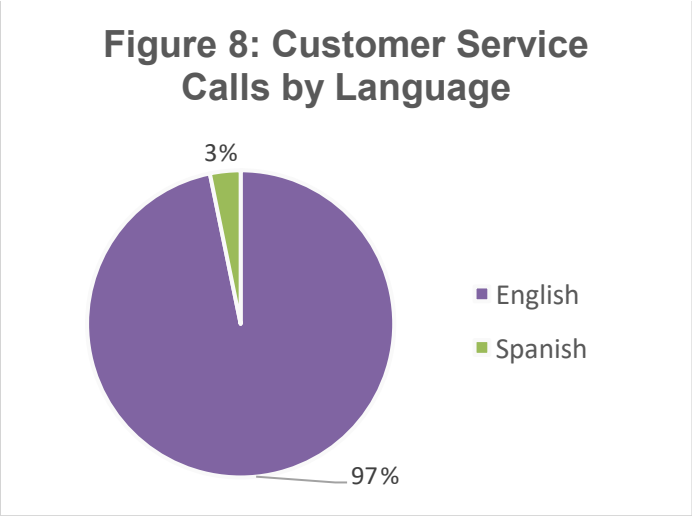
This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative, reducing the time it takes to be served in the preferred language. Currently, eight bilingual customer service representatives are employed by Valley Metro. The phone system prioritizes selection of Spanish calls received. **Table 7** shows the distribution of calls by option selected, followed by the sum of calls by language for calendar year 2019.

TABLE 7: 2019 CUSTOMER SERVICE CALL LOG

Call	Total Calls	% of Total Calls
ADA – English	20,672	1.79%
ADA – Spanish	2,457	0.21%
CR – English	166,893	14.45%
CR – Spanish	1,030	0.09%
Light Rail – English	113	0.01%
Light Rail – Spanish	2	0.00%
Lost and Found – English	16,419	1.42%
Lost and Found – Spanish	198	0.02%
TI – English	913,931	79.12%
TI – Spanish	33,462	2.90%
English (Total)	1,118,028	96.78%
Spanish (Total)	37,149	3.22%
Total Calls	**1,155,177**	**100.00%**

Figure 8 shows a pie chart of the calls by language. Approximately 97 percent of calls were for English and three percent of calls were for Spanish. At the time of this report, 38 customer service representatives were on staff; of these, 8 were bilingual (21 percent).

When evaluating the customer service call logs, the bulk of calls received are through the English phone lines with a small portion (3 percent) selecting a Spanish option.



Transit Education Program

Valley Metro has a Transit Education program that presents information to various groups to teach about public transit, benefits of transit and how to use the system. Staff members visit schools, businesses, social service agencies and present to new residents and refugee groups, senior citizens and persons with disabilities. Additionally, transit information and assistance are provided at community or special events including environmental advocacy events, transportation or vehicle days, career days and more. This team also conducts general presentations by request to any group who wants to learn more about Valley Metro services. In 2019, the transit education staff made 427 public presentations, two of which were in Spanish.

The many Spanish speaking passengers are accommodated because much of the transit information is available in Spanish. Additionally, a bilingual Valley Metro staff member will generally give the transit education presentation in Spanish upon request. Prior to the COVID-19 pandemic, the transit education staff would also conduct monthly presentations with refugee resettlement groups. Given the varied backgrounds of refugee groups, the hosting organizations would generally provide necessary interpreters. Valley Metro staff members have developed training materials that are mostly images to help bridge the language issues.

Website Translation

Apart from accessing information from transit employees—whether by phone, email, in person or another method—many customers use the www.valleymetro.org website for information. The website is equipped with the Google Translate feature, which allows translation into 52 languages. Users have translated the Valley Metro website into 43 different languages using this feature. Approximately 99

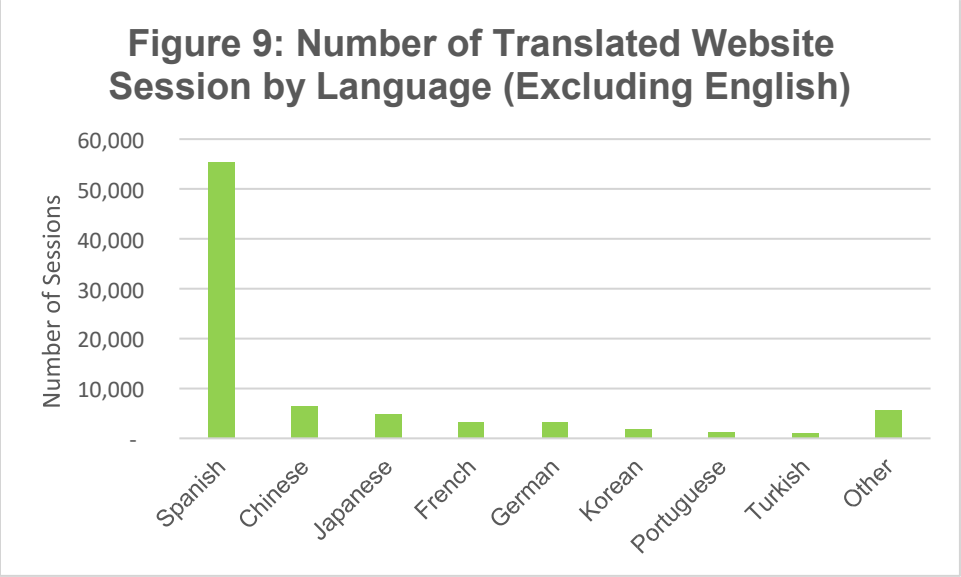
percent of interactions with the Valley Metro website used the default English setting. The remaining 1 percent used the other languages. **Table 8** lists the languages translated and the percentage of sessions in 2019. Note that only those languages accounting for at least 0.01 percent of the total sessions are included; a full table of entries is available in **Appendix B**.

TABLE 8: 2019 WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percentage of Total Sessions
English	5,659,734	98.56
Spanish	55,257	0.96
Chinese	6,506	0.11
Japanese	4,837	0.08
French	3,293	0.06
German	3,167	0.06
Korean	1,750	0.03
Portuguese	1,297	0.02
Russian	898	0.02
Turkish	1,028	0.02
Arabic	557	0.01
Dutch	497	0.01
Italian	631	0.01
Vietnamese	580	0.01
Other	5,728	0.10

Once again, Spanish was overwhelmingly the most widely used language with the website translation service, accounting for 0.96 percent of sessions, followed by Chinese (0.11 percent), Japanese (0.08 percent), French (0.06 percent), German (0.06 percent), Korean (0.03 percent, Portuguese (0.02 percent, Turkish (0.02 percent) and Other (0.10 percent).

Figure 9 shows the number of translated sessions by language.



The website was translated to 32 other languages that each accounted less than 0.01 percent of the sessions—collectively, these viewings account for 0.04 percent of all sessions. These languages include:

- Afrikaans
- Arabic
- Bulgarian
- Catalan
- Croatian
- Czech
- Danish
- Dutch
- Farsi
- Filipino
- Finnish
- Greek
- Hebrew
- Hindi
- Hungarian
- Indonesian
- Italian
- Latin
- Norwegian
- Polish
- Romanian
- Russian
- Samoan
- Serbian
- Slovak
- Slovenian
- Swedish
- Telugu
- Thai
- Tonga
- Ukrainian
- Vietnamese

Many documents on Valley Metro's website are translated into Spanish since they are disseminated as paper materials to the public. Individuals may use these documents without translating the website into Spanish. Some of these documents include project updates, route maps and schedules, instructions and applications for a Reduced Fare ID, service change information, policies, brochures, and forms.

Conclusion

The Factor 2 analysis revealed that there is regular contact between the LEP population and Valley Metro personnel. The Transit Employee Survey revealed that 23 percent of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 80 percent of respondents reported requests for Spanish. The Customer Service call log showed that a

mere three percent of customers used one of the five Spanish options. Information from the Transit Education team qualitatively identified Spanish as the main language group. Finally, translation data from the Valley Metro website indicated 1.5 percent of sessions were translated—most of which were translated to Spanish. The website was translated to 43 different languages. Overall, there is broad diversity in the Phoenix region population that accesses regional transit services; however, most people using the Valley Metro system speak English or Spanish.

4.0 NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY OR SERVICE PROIVDED (FACTOR 3)

The third step in the four-factor LEP needs assessment is an evaluation of the importance of Valley Metro services to persons with limited English proficiency. The first component of the Factor 3 analysis is to identify critical services. Next, input from community organizations was used to identify ways to improve these services for LEP populations.

The USDOT "Policy Guidance Concerning Recipients 'Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005) advises that:

> The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual . . . providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

With assistance from Valley Metro's Community Relations and Marketing departments, a list of services provided was prepared and prioritized. Input from community organizations and LEP persons was incorporated to ensure views of the importance of services provided are adequately prioritized.

4.1 Services Provided

In cooperation with Valley Metro's Communications and Operations departments, services currently provided to LEP persons were queried. All printed materials are translated into Spanish and materials in both English and Spanish are available on both bus and light rail services. Below is a list of available materials and services in Spanish that includes next bus and light rail specific services:

- Press Releases
- Public materials including, but not limited to:
    - Route Scout (announcements on buses and light rail) ○ Ride Guide and Destinations Guide ○ Service changes materials ○ Transit Book ○ Website ○ COVID-19 updates ○ Project updates ○ Title VI forms
    - Large special events materials (for example, Super Bowl public materials)

- Direct mailers or door hangers for targeted outreach
- Ticket vending machines (Spanish and Braille)
- Bilingual customer service staff
- Email list messages
- Bus specific services:

    - Car cards (on-board advertisements)
    - Bus signage (priority seating, caution signs, entry/exit, etc.)
    - Variable message sign (VMS) [3] that displays audio announcements on buses

- Light Rail specific services:

    - Light rail transit vehicle signage including priority seating, code of conduct, and other train information
    - VMS[4] announcements on vehicles and at stations ○ System maps and auxiliary information ○ Operator call boxes on trains ○ Emergency call box at stations ○ Safe place notices

Critical Services

Public transit is a key means of mobility for persons with limited English proficiency. Of those services identified above, a subset of critical services was prioritized to ensure that those services imperative to use Valley Metro public transportation options are available to all users.

Basic trip information is available both printed and electronically in Spanish, including service hours, tickets, trip planning, airport and transit connections, parking, bicycles and services for persons with disabilities. Also available in Spanish is information regarding how to use transit, acceptable user conduct, priority seating, caution signs and exit locations on vehicles. Ticket vending is available in both Spanish and Braille. Many documents are available in Braille upon request. Emergency notification measures are also translated, including audio VMS Announcements on vehicles (bus and rail), operator call boxes, emergency call boxes and Safe Place notices.

Bilingual customer service representatives are available during regular call center hours. Representatives use the same procedures for comments and note that the inquiry was in Spanish so that a bilingual representative is assigned in any follow-up response if needed. Outside of customer service hours, the website is available for translation to most languages at any time. For public meetings and hearings, a Spanish translator is usually available; additional translators are available upon request or in

[3] Variable message signs are audio announcements that occur on transit services to inform riders of relevant information and updates. Light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities

[4] Variable message signs are audio announcements that occur on transit services to inform riders of relevant information and updates. Light rail stations and vehicles are equipped with VMS announcements; most fixed route vehicles are also equipped with VMS capabilities

the appropriate context. Typically, additional translation services requested are provided for American Sign Language through an on-call contract.

Community Outreach

Valley Metro conducted interviews with six community organizations that encounter various LEP populations. Organizations were identified to ensure that a wide variety of cultural and language groups were reached over large service areas. In response to the COVID-19 pandemic, all surveys were conducted by phone call or electronically. These organizations were asked a series of questions from the FTA handbook, "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007). These organizations indicated that they serve populations speaking a broad range of languages, including Spanish, Arabic, and Swahili. The organizations interviewed range from cultural adult centers to refugee services organizations:

- Ability 360 – a local non-profit that provides services for people with disabilities
- Creighton School District – an elementary school district with 24 percent of students who speak English as a second language
- International Rescue Committee – a refugee support and relocation non-profit
- Isaac Elementary School District – an elementary school district with the highest percentage of English learners (33 percent of students)
- Literacy Volunteers of Maricopa County – a non-profit dedicated to improving adult reading and writing in English
- Turn a New Leaf – a non-profit that provides support for people experiencing homelessness, domestic violence and other challenges

Listed below are key language-related findings from the outreach effort:

1. For populations served by these organizations, public transportation is the main form of transportation to access jobs, medical appointments, social services, grocery shopping and school.
2. Spanish was the most common language spoken among the LEP populations at each organization. Swahili and Arabic were the second most common languages.
3. Organizations interviewed expressed needs of LEP populations regarding language assistance including:

    a. System Map Information**:** LEP populations have expressed a difficulty in understanding and familiarizing themselves with system maps.

    b. Transit Service Information: LEP populations have expressed the desire for information, such as how to ride and fare payment information, be communicated in an understandable format. Symbols could be used to communicate messages to a wider audience. Also, offering orientation to these populations, through their respective agencies, would familiarize them with the transit system.

4. When asked who the LEP populations would most trust to deliver transit messaging, most organizations responded that messaging should come from ethnic community organizations or individuals that speak their languages.

Valley Metro continues to make improvements in language assistance for the LEP population in the region in all areas including the three identified above. See **Appendix C** for completed surveys from each community organization.

This valuable feedback provided a few opportunities for Valley Metro to reduce barriers experienced by LEP riders. In regard to item 3, Valley Metro staff was able to introduce the organizations that expressed this concern to Valley Metro's Transit Education Program. This program can help riders better understand the transit system and provide useful transit service information. More research is needed to understand whether system map and transit service information difficulties are truly language issues, or simply educational issues.

Item 4 could be addressed through coordination with community organizations and the Valley Metro Transit Education Program. Transit education staff should continue to present materials to interested groups and should coordinate with the community organization requesting the presentation to ensure that LEP populations are getting the information they need.

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

The final step of the four-factor LEP analysis was an evaluation of the current and projected financial and personnel resources available to meet the current and future needs for language assistance. The first component of the Factor 4 analysis was to identify current language assistance measures and associated costs. The next step was to determine what additional services may be needed to provide meaningful access. The USDOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005) advises that:

> A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, 'reasonable steps' may cease to be reasonable where the costs imposed substantially exceed the benefits.

Valley Metro has a strong commitment to reducing the barriers encountered by LEP persons in accessing its services and benefits, to the extent resources are available. Valley Metro currently does not break down all cost expenditures related to providing language assistance; however, language assistance costs are evaluated on a triennial basis to include in Title VI reporting.

5.1 Current Measures and Costs

Costs incurred by Valley Metro for the language assistance measures currently being provided include:

- Translation of materials
- Printing, advertising or other marketing costs
- Interpretation services
- Staff costs associated with Title VI efforts in adhering to language assistance measures

Typically, an amount is embedded into the project costs by activity (logged under printing or other direct expenses) for translation and production of any materials. Agency-wide, there is an on-call contract for any interpretation needs. Any production costs are included in printing and public meetings budgets. Furthermore, bilingual employees provide intermittent language assistance needs as part of their other duties. The Valley Metro community outreach team hires with a preference towards bilingual speakers, especially for projects where LEP residents are prominent. Multiple employees in the community outreach team are fluent in Spanish. These employees may be assigned to prepare press releases or media events with Spanish-speaking publications in addition to their typical duties. These costs are not tracked, although most of the formal interpretation services are contracted.

Interpreters are contracted on a case-by-case basis for public meetings or hearings to ensure that any language assistance needs are met so that public relations staff can focus on facilitating the event. All hearings are staffed with interpreters while public meetings are staffed depending on the anticipated number of persons reached and upon request. Valley Metro provides headsets to those wishing to hear the presentation in the translated language. Recent public meetings for the South Central Light Rail Extension have taken place in communities where the predominant language is Spanish. To accommodate Spanish speakers, Valley Metro held some events fully in Spanish, with an English translator. Those wishing to listen to the presentation in English used headphones and printed materials in English.

Valley Metro's current contract for interpreters at public meetings costs approximately $200 per meeting. Annually, $2,000 to $3,000 is spent to provide interpreters for staff meetings and public hearings. In addition, $400 to $800 is spent annually for sign language interpreters at meetings (as requested) and public hearings. Costs for translating and producing materials such as meeting notices, display boards, news releases, and project update sheets are also budgeted annually— approximately $30,000 to $35,000. In total, approximately $33,000 to $39,000 is contracted out directly in support of language assistance services for interpreters, translation, and materials dependent on the projects and programs implemented each year.

Additional costs include other staff time used on an ad hoc or regular basis to provide translation or interpretive services. More than 30 percent of public relations and Customer Service Representatives are bilingual, assisting both Spanish- and English-speaking customers. Being bilingual is a preferred qualification when hiring customer service staff, although not required. Bilingual employees also may assist on an informal, ad hoc basis to communicate with LEP individuals in other departments.

5.2 Cost-effective Practices

Valley Metro will continue to evaluate ways to improve the cost-effectiveness and the quality of its language services. Additional strategies for saving costs or improving quality may include developing internal and external language services, with the opportunity to coordinate across multiple agencies in the region. Current measures to ensure services are cost effective include:

- Bilingual staff trained to act as interpreters and translators
- Shared customer service center and other information for combined translation and interpretation resources
- Some standardized common documents with transit and other public agencies
- Using the free Google Translate service on the Valley Metro website
- Translated vital documents currently posted on *valleymetro.org*

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

- Creating an LEP information center for Valley Metro employees
- Surveying Valley Metro staff to determine any additional existing multilingual resources
- Conducting outreach to various community organizations to secure volunteers for translation and interpretation services that are currently contracted or completed inhouse
- Consolidating contract services for oral and written translation to secure the most costeffective rates

Valley Metro continues to use qualified translators and interpreters to uphold the quality of language assistance measures. Valley Metro strives to provide basic informational training for volunteer staff on its language assistance measures.

5.3 Additional Services and Budget Analysis

Valley Metro is committed to reducing the barriers encountered by LEP persons in accessing its services to the extent funding is available. While Valley Metro currently does break down contracted cost expenditures related to providing language assistance, expenditures of efforts for translation and interpretation completed in-house are less well documented. As part of the Language Assistance Plan, Valley Metro will better monitor efforts in the future. Valley Metro will further evaluate how to consolidate its language assistance measures to deliver the most cost-effective services.

The information received from community organizations provided some insight on additional services that may ease access for LEP persons to regional transit services. Services requested were centered on service expansions that included increased frequencies and later services at night. However, these would be improvements for consideration and prioritization of the system rather than specific services for LEP persons. Therefore, they were excluded here and assigned to the general public process for service requests.

Other requests included using more symbols to depict messaging and system routes. Audio messaging using VMS that could potentially show messaging in another language as well. The light rail system VMS currently shows messages in English and Spanish. Bus messaging is typically location data and in close

proximity, depending on stop locations. Some audio messages on buses are announced in Spanish. The feasibility and helpfulness of VMS translation should be evaluated.

As applicable and through the annual budget process, additional services requested or identified may be considered for implementation. In 2015, Valley Metro shifted to a zerobased budget that is approved by two boards of directors: Valley Metro Rail Board and the Valley Metro RPTA Board. The budgets are developed and approved annually as appropriate to the unique needs and demands of each agency at that point in time.

5.4 Projected Costs

Requests for added services include expanded symbols to understand how to use transit services, on-board messaging and system map information. With a commitment to providing reasonable language assistance measures, Valley Metro will assess current symbols used on vehicles, at station locations and elsewhere to determine the sort of improvements that could be made so that the system is more easily understood visually. With expanded use of symbols, it is expected that the need for enhancing the on-board messaging and system map information may be reduced. Furthermore, these could be incorporated into the regular updates of this information and signage. Biannually, in coordination with the service changes, updated system maps are produced.

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

6.0 LANGUAGE ASSISTANCE MEASURES

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

6.1 Current Language Assistance Measures

Spanish Language Assistance

As discussed earlier, Valley Metro currently provides both oral and written language assistance in Spanish. Oral language assistance includes bilingual customer service representatives, speaking Spanish. Additionally, Spanish interpreters are available at public meetings. On vehicles and at stations, VMS announcements are provided in Spanish.

Written Spanish language assistance includes signs, press releases, list serve messages, service change materials, Title VI complaint forms, policies and procedures. Additional translation of some vital documents is provided, such as schedules, maps, ride and destination guides, Route Scouts and more. Meeting notices and public input surveys at public meetings are translated.

Notices to the public of language assistance measures are typically provided side-by side with an English version of the document. For example, Ride Guide documents are provided in both English and

Spanish and are available together wherever disseminated. Where available, documents are printed on both sides with an English version and a

Spanish version on each side of the paper. When calling into the customer service line, the interactive voice response system will automatically ask if Spanish is the preferred language prior to being connected with a representative.

Languages other than Spanish

Valley Metro provides oral and written translations into other languages when applicable. For written translations the Valley Metro website is equipped with the Google Translate feature, which allows translation into 52 languages (www.translate.google.com). For oral translations, the agency uses an existing contract that can provide translations into all languages identified in the Language Assistance Plan, as well as American Sign Language. Translators under this contract are used for public meetings, canvassing and other community outreach as needed. Valley Metro also provides sign language interpreters for public meetings when requested, and provides Braille translations on fare vending machines and for printed documents upon request.

6.2 Staff Training

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

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

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

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

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

6.3 Future Language Assistance Services

With the development of subsequent Language Assistance Plans, the monitoring, evaluation and update process would identify additional services to be considered for feasibility of implementation. Valley Metro strives to serve LEP populations adequately with an equal opportunity to use transportation options available. Section 7 provides more information about the plan's monitoring and update process.

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

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

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

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

Throughout the monitoring period, Valley Metro will continue to follow the recommendations and use the resources provided by Executive Order 13166, FTA Circular 4702.1B, the USDOT's "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005), and the FTA handbook "Implementing the Department of Transportation's Policy Guidance Concerning

Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (FTA 2007). Valley Metro will be better able to apply the DOT LEP guidance's four-factor framework and will continue to determine an appropriate mix of language assistance in the preparation of language assistance implementation plans.

Language Assistance Program Survey 2021

Name: _____

1. Have you had any requests for information or materials in other languages in the past two years?
    a. Yes
    b. No

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

2. Which language(s) have been requested?

    _____

    _____

3. How often do you receive requests?
    a. More than once a week
    b. Once a week
    c. More than once a month
    d. Once a month
    e. Once every three months
    f. Once every six months
    g. Once a year
    h. Other: _____

4. Do you have the resources needed to help customers with language requests?

    a. Yes
    b. Sometimes
    c. No

APPENDIX B – WEBSITE SESSIONS BY LANGUAGE

Language	Number of Sessions	Percent of Total Sessions
Afrikaans	35	0.00
Arabic	557	0.01
Bulgarian	33	0.00
Chinese	6,506	0.11
Croatian	63	0.00
Czech	220	0.00
Danish	17	0.00
Dutch	497	0.01
English	5,659,734	98.56
Farsi	29	0.00
Filipino	25	0.00
Finnish	200	0.00
French	3,293	0.06
German	3,167	0.06
Greek	90	0.00
Hebrew	77	0.00
Hindi	27	0.00
Hungarian	65	0.00
Indonesian	122	0.00
Italian	631	0.01
Japanese	4,837	0.08
Korean	1,750	0.03
Latin	119	0.00
Norwegian	198	0.00
Polish	243	0.00
Portuguese	1,297	0.02
Romanian	79	0.00
Russian	898	0.02
Samoan	38	0.00
Serbian	18	0.00
Slovak	58	0.00
Slovenian	114	0.00
Spanish	55,257	0.96
Swedish	288	0.01
Telugu	83	0.00
Thai	24	0.00
Tonga	22	0.00
Turkish	1,028	0.02
Ukrainian	30	0.00
Unknown	175	0.00
Vietnamese	580	0.01
Total	5,742,597	100

Ability 360

2/11/2021

1. What geographic area does your agency serve?

   The Phoenix Metro area, although we have people that come as far as Payson. We cover near and far.

2. What kind of services does your organization provide?

   Sports, fitness and health-related activity for total inclusion in the community. The main facility does handle home-health, and community integration services.

3. How many people does your agency provide services to?

   2,300-2800 was the last member count. The numbers have decreased due to the pandemic.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

   Increased over the last five years.

5. What are the countries of origin from which your population has immigrated?

   Iran, Iraq, Puerto Rico, Mexico, people from all around the world that are here using the gym on a regular basis.

6. Does your population come from an urban or rural background?

   I don't know.

7. What are the languages spoken by the population you serve?

   English
   Spanish
   Arabic

8. What is the age of your population?

   No idea. Due to coronavirus, a lot of things have changed. We serve more adults right now than children. In normal times, we cover the entire continuum.

9. What is the education and literacy level of the population you serve?

   Here to there. The fact that our population has disabilities, it's difficult to say. I myself don't have that knowledge and it's not something we normally ask.

10. What needs or expectations for public transportation services has this population expressed?

    We are so thankful for the stop at the top of the hill. That's made a huge difference in our client's lives. Just the other day, there was a man who took two buses and the light rail to get here. It's been his lifeline.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

    I don't know.

12. What are the most frequently traveled destinations?

    Everywhere. They jump on the light rail. Most of our population do not drive.

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

    I don't know.

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

    I don't know.

15. What is the best way to obtain input from the population?

    Survey. Either paper or electronic. All our registrations are done by app and website.

16. Who would the population trust most in delivering language appropriate messages?

    I don't know.

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    I don't know.

Creighton School District

1/27/2021

1. What geographic area does your agency serve?

   Creighton School District serves the following geographical area: 16th ST – 32nd ST from N Van Buren to Indian School and from 32nd ST - 40th ST from N Van Buren to Lincoln Drive.

2. What kind of services does your organization provide?

   In addition to educational services, we offer transportation services to McKinney-Vento eligible families, which are families experiencing homelessness. Our district is able to provide transportation assistance to families experiencing homelessness thanks to our McKinney-Vento grant.

3. How many people does your agency provide services to?

   As of January 25th, 2021, our school district serves 167 families in our transportation program. However, the number of families requesting transportation assistance is increasing due to the COVID pandemic.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

   For the past five years we have experienced a declined on our homeless population. However, the number of families requesting transportation assistance is increasing due to the COVID pandemic.

5. What are the countries of origin from which your population has immigrated?

   Creighton School District serves families who have immigrated from mostly México, South America, and Africa.

6. Does your population come from an urban or rural background?

   Most our families come from urban areas, but we do have a small percentage of families who come from rural areas.

7. What are the languages spoken by the population you serve?

   Our district serves families that speak over 26 languages, however Spanish is the most common language in our community.

8. What is the age of your population?

   Our district serves students between ages 3 to 14 years old (Preschool to 8th grade).

9. What is the education and literacy level of the population you serve?

   We serve low-income families and commonly their level of literacy varies from each household from Middle School to some High School education. A small percentage of our families have completed graduate and undergraduate education.

10. What needs or expectations for public transportation services has this population expressed?

Most of our families request transportation services for school, doctor appointments, counseling, or other social services.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

    Yes, since we serve low income families, we do receive many transportation requests. However, our district is able to provide transportation assistance to families experiencing homelessness thanks to our McKinney Vento grant.

12. What are the most frequently traveled destinations?

    Most of our families request transportation services for school, doctor appointments, counseling, or other social services.

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

    Not at this time.

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

    Yes.

15. What is the best way to obtain input from the population?

    Our community respond well to in person meetings, phone calls, email or texts.

16. Who would the population trust most in delivering language appropriate messages?

    Our community trusts school officials or people who speak their native language.

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    Yes we used some, but we would like to have more information about the tools and resources you have available for community members.

International Rescue Committee

1/14/2021

1. What geographic area does your agency serve?

   West Phoenix, I-17 corridor, Glendale, various others

2. What kind of services does your organization provide?

   Refugee Resettlement: Employment, financial coaching and credit building, English language classes, case management, school support, clinical therapy, immigration services

3. How many people does your agency provide services to?

   1,200+

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

   Decreased (COVID-19, public policy)

5. What are the countries of origin from which your population has immigrated?

   Democratic Republic of the Congo, Myanmar, Afghanistan, Eritrea, Guatemala, Iraq, and more

6. Does your population come from an urban or rural background?

   Predominately rural

7. What are the languages spoken by the population you serve?

   Swahili, Kinyarwanda, Arabic, Dari, Burmese, Afar, Tigrinya, French, Rohingya, Spanish, and many smaller tribal languages: Kinyabwisha, Chin, Kibembe, Lingala, etc.

8. What is the age of your population?

   0-99

9. What is the education and literacy level of the population you serve?

   Varies; predominantly below secondary school

10. What needs or expectations for public transportation services has this population expressed?

    Wait times between buses, especially during hot summer months; reliability/timeliness

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

    Refugees are dependent on public transportation

12. What are the most frequently traveled destinations?

Apartment complexes, schools, grocery stores, DES at 43rd/Olive, warehousing/manufacturing between Van Buren and Buckeye, between 35th and 91st Ave

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

    Employment around Buckeye and 83rd Ave

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

    No

15. What is the best way to obtain input from the population?

    Engage with Ethnic Community Based Organizations, who can support listening sessions

16. Who would the population trust most in delivering language appropriate messages?

    Ethnic Community Based Organizations, International Rescue Committee and other resettlement agencies

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    The agency passes out transit books and conducts internal transit training. Unaware of other opportunities and resources.

Literacy Volunteers of Maricopa County

1/14/2021

1. What geographic area does your agency serve?
   City of Phoenix, 3 locations; and virtually.

2. What kind of services does your organization provide?
   Free adult education services, two programs:
   -Adult Basic/Secondary Education, and GED preparation to attain High School Equivalency Diploma.
   -English Language Acquisition for Adults (formerly referred to as English as a Second Language ESL).

3. How many people does your agency provide services to?
   Approximately 700.

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years? Slight decrease

5. What are the countries of origin from which your population has immigrated?
   All over the world; most recently African countries and Middle Eastern countries.

6. Does your population come from an urban or rural background?
   City of Phoenix: urban

7. What are the languages spoken by the population you serve?
   Many different languages; all instruction delivered only in English language.

8. What is the age of your population?
   16-99; median about 40-50.

9. What is the education and literacy level of the population you serve? Lower levels of literacy, compared to 4th grade level or lower.
10. What needs or expectations for public transportation services has this population expressed? Not aware of any.

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?
    Unknown

12. What are the most frequently traveled destinations? Unknown

13. Are there locations that the population has expressed difficulty accessing via the public transportation system? Unknown

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?
    Unknown

15. What is the best way to obtain input from the population? Survey

16. Who would the population trust most in delivering language appropriate messages? Their own community leaders

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    No. Unaware of services.

Isaac Elementary School District

2/24/2021

1. What geographic area does your agency serve?

   Isaac Elementary School District is located in West Phoenix

2. What kind of services does your organization provide?

   Education

3. How many people does your agency provide services to?

   3000 students

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

   Increased

5. What are the countries of origin from which your population has immigrated?

   Many countries including but not limited to: Mexico, India, Tanzania, Democratic Republic of Congo, Uganda, Pakistan, Nigeria, Kenya

6. Does your population come from an urban or rural background?

   Both

7. What are the languages spoken by the population you serve?

   1) Spanish (97% of English Learners), 2) Swahili (1%) 3) Kirundi (1%) 4) Other (1%)

8. What is the age of your population?

   Youth 5-11 years old

9. What is the education and literacy level of the population you serve?

   Elementary school

10. What needs or expectations for public transportation services has this population expressed?

    Students and families use public transportation

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

    Somewhat

12. What are the most frequently traveled destinations?

    Travel has decreased during COVID-19

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

    No

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

    Unsure

15. What is the best way to obtain input from the population?

    Unsure

16. Who would the population trust most in delivering language appropriate messages?

    People that speak their language

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    We have done this in the past but it has been a while

Turn a New Leaf

1/14/2021

1. What geographic area does your agency serve?

   Maricopa County

2. What kind of services does your organization provide?

   Housing, Shelter, Behavioral Health Services, Children Services

3. How many people does your agency provide services to?

   Last year over 30,000

4. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?

   Increased

5. What are the countries of origin from which your population has immigrated?

   Mexico

6. Does your population come from an urban or rural background?

   Urban

7. What are the languages spoken by the population you serve?

   Mostly English and Spanish

8. What is the age of your population?

   We serve all age groups from infants in our childcare centers to those over 62 in our shelter and housing programs

9. What is the education and literacy level of the population you serve?

   A majority or our participants have a GED

10. What needs or expectations for public transportation services has this population expressed?

    Some of our clients have expressed more routes that run earlier and later than current hours and more opportunities for discounted fares

11. Has the population inquired about how to access public transportation or expressed a need for public transportation service?

    A majority of those we serve to rely on public transportation and some that are new to the area due struggle to operate the bus system

12. What are the most frequently traveled destinations?

    Mostly throughout mesa and phoenix

13. Are there locations that the population has expressed difficulty accessing via the public transportation system?

    East Mesa (towards apache junction) and the far west valley

14. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?

    Not anything noticeable

15. What is the best way to obtain input from the population?

    Simple surveys by email or paper surveys offered at the programs

16. Who would the population trust most in delivering language appropriate messages?

    The case managers or support staff working with them in the individual programs

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?

    I can say for the program I oversee, (shelter and housing) I was not aware of these tools and I would interested in receiving information. malberti@turnanewleaf.org

Non-elected Committees Membership Table

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

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%
TYPE THE NAME OF THE COMMITTEE HERE	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%	TYPE % HERE%

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

Title VI Equity Analysis

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

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

Note: Even if facility construction is financed with non-FTA funds, if the sub recipient organization receives <u>any</u> FTA dollars, it must comply with this requirement.

The City of Goodyear has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since December 2010.

Regional System-Wide Standards and Policies

The City of Goodyear 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 helps manage our regionally funded transit services and investments like bus stops, park-and-ride facilities and future light rail destinations. The following three phase approach is posted on Valley Metro's Website.

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.

As of May 2022, the City of Goodyear has all of their service provided by Valley Metro and will follow their Regional System Wide Standards and Policies. Please see **Attachment A** for a copy of their policy.

The only part of their policy that will not apply is the Distribution of Transit Amenities. The City of Goodyear will use the following policy:

Transit Amenities refer to fixed items of comfort and convenience available to the general riding public such as shelter placement, 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.

Goodyear policy is to review and ensure amenities are placed within the City without regard to race, color, national origin, or income considerations.

Shelter Placement – the City of Goodyear continues to use ridership as the primary criterion for determining shelter placement. A variety of bus shelter shapes and sizes are available to address site restrictions, opportunities, and ridership needs.

The following criteria should be used as a guide in the placement of customer shelters:

- Shelters should be placed at all established park and ride lots.
- A shelter should "aesthetically fit" its surroundings where economically feasible
- Shelters can be standardized to some degree for possible cost effectiveness via quantity purchase prices, for maintenance purposes or to maintain aesthetic continuity
- Shelters should be installed at major transfer points between routes
- Shelters should include amenities such as display space for route maps and schedules, benches, trach cans and lighting.

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 and must not infringe upon the ADA pad or pedestrian pathway.

For additional information about regional system-wide standards and policies, please see Attachment A, Valley Metro Regional System Wide Standards & Policies

Service and Fare Policy Changes

For all Service and Fare changes, the city of Goodyear follows Valley Metro's regional process. There have been no Service or Fare changes in Goodyear since the last Title VI update.

Monitoring for Subrecipient Title VI Compliance

The City of Goodyear does NOT Currently have subrecipients and therefore does NOT monitor subrecipients for Title VI compliance. In the event subrecipients come under the control of the

City of Goodyear, the City will adopt and implement a policy and procedure which ensures that all subrecipients comply with their obligations under Title VI and any other applicable federal and state laws, regulations, and rules.

Board Approval for the Title VI Program

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

Attachment A

Valley Metro Regional System Wide Standards & Policies

TRANSIT STANDARDS AND PERFORMANCE MEASURES

Procedures Guide

SEPTEMBER 2019

VALLEY METRO

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Introduction

Valley Metro's Transit Standards and Performance Measures (TSPM) process was initiated for multiple purposes, including the necessity of developing a performance-based public transportation system consistent with federal and state (including Transit Life Cycle Program) requirements. Transit standards and performance measures are intended to assess the effectiveness of transit operations in achieving the adopted service provision goals and help identify whether performance improvement actions taken to enhance performance and productivity are effective. The Fixing America's Surface Transportation (FAST) Act furthered several important transportation goals, including safety, state of good repair, performance and program efficiency. The act established performance-based planning requirements that align federal funding with key goals and tracks progress towards those goals.

In coordination with representatives from member agencies, Valley Metro initiated a process to establish agency transit service and capital standards and performance measures. The initial scope of Valley Metro's TSPM effort required the completion of the process through multiple phases. The initial phase, adopted by the Valley Metro Regional Public Transportation Authority (RPTA) Board of Directors and Valley Metro Rail (VMR) Board of Directors in November 2013, considered elements critical to the establishment of transit service standards including the identification of service provision goals, defining service types (including minimum operating standards for each), preliminary performance measures and the process for evaluating and recommending service changes. The second phase, adopted by the RTPA and VMR Boards of Directors in December 2014, focused on the development of transit service performance measures, transit service thresholds, application principles and implementation standards for new service. The third phase, adopted by the RTPA and VMR Boards of Directors in June 2016, focused on defining the process for the development of performance thresholds, the establishment of service design standards, and the development of a regional fleet prioritization process for existing and expansion fleet needs. The Final Reports for each phase are provided in the Appendices A-C of this document. Adoption of TSPM included the stipulation that TSPM would be reviewed every two years and updated regularly as appropriate to ensure they are consistent with Valley Metro's evolving goals.

This document serves as the first comprehensive update to the adopted TSPM policies and defined procedures associated with the administration of evaluating the performance of the region's transit services and capital assets. Rather than independent TSPM sections, this update consolidates all previous TSPM phases into the TSPM Procedures Guide and incorporates the updates undertaken through collaborative discussions with member agencies/regional partners in the Transit Standards and Performance Measures Working Group (TSPMG) and Service Planning Working Group (SPWG) from August 2018 to May 2019.

The TSPM Procedures Guide is considered to be a "living" document and is intended to refine existing standards and establish any new elements (such as emerging technologies and service models) as necessary to advance the goals and objectives of the Valley Metro Regional TSPM program. As a result of the review process, there were several additions, deletions, and modifications to various TSPM elements. The document is organized into the following seven distinct sections:

- 100 – TSPM Program Overview
- 200 – Transit Service Standards
- 300 – Transit Service Performance Measures and Evaluation Process
- 400 – Bus Stop Optimization Process
- 500 – Regional Fleet Prioritization Process
- 600 – Transit Center and Park-and-Ride Classification
- 700 – Mobility Enhancement Uses

100 – TSPM Program Overview

Regional transit standards and performance measures were established to assist Valley Metro and member agencies in developing and maintaining a performance-based approach to managing the region's transit investments. This section of the TSPM Procedures Guide documents the four elements that comprise the foundation of the TSPM program. These elements include:

- 110 – Valley Metro Transit System Goals and Objectives
- 120 – Applicability of TSPM
- 130 – TSPM Process Overview
- 140 – TSPM Update Process

110 – Valley Metro Transit System Goals and Objectives

Transit system goals were developed by Valley Metro and member agencies to establish a common framework for developing transit standards and performance measures; a total of five transit service provision goals were adopted by the RPTA and VMR Boards. The adopted transit service provision goals and objectives are provided in **Table 1**.

Table 1: Adopted Transit Service Provision Goals and Objectives

Adopted Goals	Adopted Objectives
Implement services in the Regional Transportation Plan (RTP) in consideration of a performance-based system.	▪ Meet or exceed ridership levels as determined by ridership thresholds established by applicable service mode ▪ Meet or exceed farebox recovery levels as determined by Valley Metro's adopted target for farebox recovery by applicable service mode
Adopted Goals	**Adopted Objectives**

Give high priority to services that focus on the transit-dependent population.	▪ Serve low-income, zero-auto households, elderly, youth, and persons with mobility disabilities (as determined by the established thresholds for service area measures)
As a secondary priority, provide transit service that is desirable as an alternate mode to automobile travel.	▪ Provide transit services that offer reliable travel times and transfer connections (Definition: Reliability is determined by the current established threshold for on-time performance) ▪ Provide transit service options that offer travel times (bus stop to destination) competitive with single occupied vehicle travel ▪ Provide secure transit services (Definition: Security is determined by the current established threshold for the number of public safety incidents per 100,000 miles of revenue service) ▪ Provide comfortable passenger trips through adequate seating availability (Definition: Comfort is determined by the current established threshold for peak load factor)
Improve Valley Metro's overall performance and promote the long-term financial stability of the agency.	▪ Meet or exceed ridership levels as determined by ridership thresholds established by applicable service mode ▪ Meet or exceed Valley Metro's adopted target for farebox recovery
Promote expansion that builds existing services to meet standards and focuses new services in key areas (higher population density, limited auto availability, low income, major activity centers).	▪ Meet regional transit service standards as adopted by Valley Metro Boards ▪ Serve low-income or zero-auto households ▪ Provide regional connectivity ▪ Serve population and employment areas (transit service demand)

120 – Applicability of TSPM

The applicability of the TSPM to transit investments in the region is defined as follows:

120.1 Services Subject to TSPM

All transit services that are or will be funded (all or in part) by Arizona Legislature-approved Valley Metro regional transit funding sources (currently the Public Transportation Fund and Arizona Lottery Fund) are subject to the board-adopted regional TSPM. Local jurisdictions that fully fund and operate transit services are encouraged to adopt the regional TSPM for locally funded transit investments.

120.2 Relationship to Transit Life Cycle Program

The application of the regional TSPM will be consistent with, and adhere to, the Valley Metro Boardadopted Transit Life Cycle Program (TLCP) policies. Should a discrepancy arise between the application of the regional TSPM and the TLCP policies, the TLCP policies[5] shall take precedent.

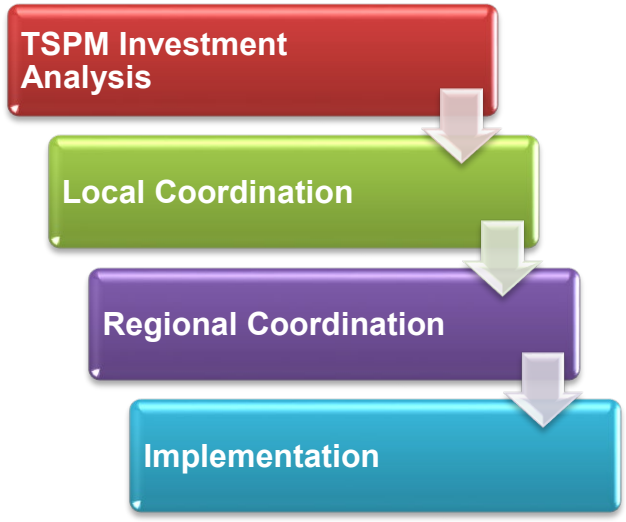
130 – TSPM Process Overview

[5] Valley Metro's TLCP policies can be found on their website at https://www.valleymetro.org/transit-lifecycle-program

Valley Metro will conduct an annual transit performance evaluation consistent with the procedures established within this guide and in coordination with other adopted processes such as TLCP updates, Short-Range Transit Program (SRTP), and individual evaluations requested by member agencies.

The annual transit performance evaluation process includes an assessment of all existing transit services in the region (locally funded and regionally funded) by service and facility type. Four primary steps are included in the performance evaluation process: TSPM investment analysis, local coordination, regional coordination, and implementation. **Figure 1** provides an overview of the process.

Figure 1: TSPM Process Overview



Using TSPM, review and analyze top and bottom quartile routes (by service type) and concepts for new service or service adjustments

Through the SRTP, identify opportunities for performance improvement actions with affected jurisdictions

Coordinate performance improvement action recommendations with the Service Planning Working Group (SPWG) and SRTP

Coordinate through the SPWG and SRTP and implement performance improvement actions with affected local communities

140 – TSPM Update Process

Regional transit standards and performance measures, including the procedures documented in the guide, will be updated regularly as appropriate to ensure that the adopted transit standards, performance measures, and associated processes are consistent with Valley Metro's evolving goals and objectives. The Valley Metro regional transit standards and performance measures will be reviewed approximately every two years and updated as required.

Table 2 provides a high-level overview of the changes made to the TSPM in this 2019 update, with all changes elaborated on greater detail within in each subsection.

Table 2: Summary of TSPM Changes

Change	Section	Description

Addition	Section 210 – Transit Service Types	Incorporated streetcar and bus rapid transit (BRT) as transit service types.
Addition	Section 220 – Transit Service Standards	Incorporated streetcar and BRT service standards.
Addition	Section 240.6 – Local Service Planning Support	Developed support request form to better document and assist member agencies with evaluating their services and improve the SRTP process.
Modification	Section 240.9 – Transit Propensity Tool	Modified the propensity tool methodology to include additional variables that make the model better reflect the region's context.
Addition	Section 250.0 – Frequency Assessment Standards for Transit (FAST)	Developed a planning tool to evaluate the existing transit network for opportunities to increase frequency.
Addition	Section 310 – Transit Service Performance Measures and Planning Tools	Added eight new planning tools including boarding to peak fleet ratio, employed and student population, weekday average boardings, percent time point dwelling, average dwell per time point, peak speed, off-peak/peak speed ratio, and FAST
Deletion	Section 310 – Transit Service Performance Measures and Planning Tools	Removed boardings per revenue hour as a Transit Standard Performance Measure[6].
Addition	Section 310 – Transit Service Performance Measures and Planning Tools	Adopted Frequent Service (Local and Express Services) and Late Night (Local Service) Maps to recognize routes that exceed performance standards.
Addition	Section 320.1 – Fixed Route Benchmarks	Adopted Transit Performance Report (TPR) benchmarks (boarding per year, revenue miles per year, boardings/revenue mile) to track overall system health as part of the TSPM process.
Addition	Section 400 – Bus Stop Optimization Process	Adopted a process for evaluating the existing transit network's bus stop spacing for the possibility of stop consolidation or elimination.
Modification	Section 510 – SRTP Methodology	Adjusted the five-year program's production years to be years 1-3 and development years to be years 4-5.
Addition	Section 600 – Transit Center and Park-and-Ride Classification	Adopted a classification matrix with general facility features to improve regional consistency and meet customer expectations.
Addition	Section 700 –Mobility Enhancement Uses	Incorporated a coordination effort to create a database of regional Mobility Enhancement Uses (MEUs) pilots.

[6] See page 21 for explanation as to why this measure was eliminated.

200 – Transit Service Standards

Transit service standards include the definition of transit service types and the standard operating characteristics of each. This section provides a description of the adopted Valley Metro transit service types and their associated standards and is organized as follows:

- 210 – Transit Service Types
- 220 – Transit Service Standards
- 230 – Transit Service Design Standards
- 240 – Transit Service Standards Procedures

210 – Transit Service Types

Transit service types are used to define and classify the different modes of transit service operated in the region. By classifying transit services into different types, routes can be more equitably compared to one another within the same service type and performance expectations can be better managed. For example, a commuter express bus route that operates a limited number of peak-period one-way inbound and outbound trips would not be expected to perform similarly to a local bus route that operates in densely populated areas with moderate to high frequency service throughout the day. Transit service types also serve as a tool for understanding what type of service may be most appropriate for a specific area or location. Ten service types were established as part of the original TSPM efforts and include vanpool, demand response/flex route, rural connector, community circulator, local bus, key local bus, limited stop peak, limited stop all-day, commuter express, and light rail transit. As a result of the evolving regional transit system, two additional service types have been incorporated as part of this update: streetcar and bus rapid transit (BRT). With every update, new service types may be added to the TSPM. A description of each adopted service type is provided in **Table 3**.

Table 3: Transit Service Types

Service Type[7]	Description
Vanpool	Serves groups of 6 to 15 persons that travel to a common destination. Provides a commuter express-type option for limited-demand worksites not necessarily located within major regional employment centers.
Demand Response/Flex Route	Serves low-density (four DU/Acre or lower) and low-demand areas not currently capable of sustaining fixed-route transit service or other available basic mobility options. Potentially more cost-effective than traditional fixed-route transit service based on total cost to operate and may be implemented to connect community members to essential local destinations including, but not limited to, grocery stores/pharmacies, medical facilities, education campuses, and work sites.

Service Type[3]	Description

[7] Fare structure varies between service types. Information on Valley Metro fares can be found at https://www.valleymetro.org/fares.

Rural Connector	Provides rural areas with connections to urban services. Service typically operates in "flex" mode to meet ADA requirements for curb to curb service within 0.75 miles of the route alignment. Passenger stops may be fixed by location or offered on a "flag" or "hail" basis.
Community Circulator	Generally operates in neighborhoods or activity centers (i.e. central business district, historic town center, etc.) providing connectivity to local area resources /amenities, providing area circulation, or connecting to fixed local route service. Routes are typically short in length and may offer circuitous routing to provide direct connections to local area destinations. Passenger stops may be fixed by location or offered on a "flag" or "hail" basis.
Local Bus	Traditional fixed-route transit bus service that generally operates on arterial roadways. Except where there is limited development, passenger stops are typically posted on frequent intervals to maximize passenger access. The Valley generally operates on a grid system (north-south/east-west routes) that facilitates transfers to reach destinations.
Key Local Bus	Similar to local bus service, but located in corridors that are expected to meet a higher level of performance based on proximity to transit dependent populations (low-income and low-auto ownership) and demonstrated performance. New local routes should be classified as a local bus, until performance at the Key Local Bus level is demonstrated. Please see an expanded description in the Key Local Bus Qualifications Section.
Limited Stop Peak	Limited stop peak service generally operates on arterial roadways during peak periods with a limited or infrequent number of passenger stops. The limited stop configuration provides for increased operating speeds. This service type can be operated as an overlay service within a corridor or roadway that is served by one or more other service types.
Limited Stop All-Day	Characterized by limited stop, high frequency, all-day service. Generally operates on arterial roadways with a limited or infrequent number of passenger stops. The limited stop configuration provides for increased operating speeds. This service can be operated as an overlay service within a corridor or roadway that is served by one or more other service types as demonstrated by service-demand studies.
Commuter Express	Transit service designed to serve commuter markets. Typically operates during peak periods with a limited number of inbound passenger stops (express), connecting residential areas or suburbs/cities with regional employment centers. This service uses park-and-ride facilities as primary inbound passenger access points and freeway high occupancy vehicle lanes (HOV) or other fixed/semiexclusive guideways where available.
Streetcar	Streetcar is an electric-powered rail technology that could operate in either shared or exclusive lanes. Streetcar vehicles are smaller and usually travel shorter distances than light rail vehicles. It serves high density urban areas, such as downtowns and major employment centers.
Bus Rapid Transit (BRT)	Rapid mode of transportation that can provide the quality of rail transit and the flexibility of buses. This often includes a high degree of performance (especially speed and reliability), ease of use, ITS elements, integrated system of facilities, enhanced equipment / services / operations / amenities, and careful attention to aesthetics and comprehensive planning.

Service Type[3]	Description
Light Rail Transit	A high capacity rail transit technology operating on a fixed or semi-exclusive guideway. Generally serves moderate to high density urban/suburban areas providing connections to regional employment centers and other major activity centers.

220 – Transit Service Standards

Transit service standards represent the operating characteristics of a service including frequency, span of service, and days of operation and assist in the general design of services. They also provide for a more consistent and reliable regional transit system for passengers. Transit service standards, which have been adopted for each service type, are based on anticipated demand (ridership), markets served (e.g. all day travel market versus commuter market), and proven industry practices employed by peer regions. For example, routes identified as Key Local Bus routes have higher demand; therefore, they have a higher minimum recommended standard for frequency (every 15 minutes during peak and 30 minutes off-peak) compared to Local Bus routes (every 30 minutes all day) which have lower general demand. Service standards for each service type, as well as the two new service types, are provided in **Table 4**.

Table 4: Service Standards by Service Type

Service Type	Minimum Headway or Daily Trips[1]	Minimum Span Week / Sat / Sun	Minimum Operating Days
Dial-a-Ride (ADA)	NA	ADA service shall be available throughout the same hours and days as fixed route service	
Vanpool	NA	NA	NA
Demand Response/Flex Route	NA	NA	NA
Rural Connector	4 trips inbound / 4 trips outbound	NA	Mon – Fri
Community/Circulator	30 min	12 hrs / 0 hrs / 0 hrs	Mon – Fri
Local Bus	30 min[2]	16 hrs / 14 hrs / 12 hrs	Mon – Sun
Key Local Bus	15 min peak / 30 min base	16 hrs / 14 hrs / 12 hrs	Mon – Sun
Limited Stop Peak	4 trips AM / 4 trips PM	NA	Mon – Fri
Limited Stop All-Day	Headways same as LRT, up to 2X Peak	16 hrs / 14 hrs / 12 hrs (Same as LRT)	Mon – Fri
Commuter Express	4 trips AM / 4 trips PM	NA	Mon – Fri
Light Rail Transit	12 min all day / 20 min base	18 hrs / 14 hrs / 12 hrs	Mon – Sun
Streetcar[3]	12 min all day / 20 min base	18 hrs / 14 hrs / 12 hrs	Mon – Sun
Bus Rapid Transit[3]	12 min all day / 20 min base	18 hrs / 14 hrs / 12 hrs	Mon – Sun

[1] *Standards require service to be bi-directional unless otherwise noted*

[2] *60 minute frequency during off-peak hours (before 6:00 AM and after 6:00 PM)* [3] *New Service Type*

Passenger stops and stations are categorized as transit capital facilities and the spacing of each facility has a direct impact on transit service operations by affecting travel time and passenger access. Transit service types that provide localized operations typically have passenger stops more frequently spaced in contrast with limited stop services, where passenger stops are located at greater distances. Minimum passenger stop spacing, which is provided in **Table 5**, has been adopted for the applicable

transit service types. Passenger stop spacing standards represent minimum spacing distances; however, where development patterns are of higher or lower density than typical within the region, an exception to the adopted standard may be warranted (e.g. closer stops spacing in downtown areas).

Table 5: Minimum Passenger Stop Spacing

Service Type	Base*
Vanpool	NA
Demand Response/Flex Route	NA
Rural Connector	NA
Community/Circulator**	1/4 Mile
Local Bus	1/4 Mile
Key Local Bus	1/4 Mile
Limited Stop Peak	1 Mile
Limited Stop All-Day	1 Mile
Commuter Express	4 Maximum Inbound Stops
Light Rail Transit	1 Mile
Streetcar***	1/4 Mile
Bus Rapid Transit***	1/3 - 1 Mile

**There can be stops spaced up to 1/8 of a mile in High Density Areas*

***Some circulators have flag stops; therefore, spacing may vary *** New transit service type*

230 – Transit Service Design Standards

Service design standards provide a consistent structure for planning new services or modifying existing services. This section provides a description of the service design standards for route deviations, route duplication, and revenue-service end-of-line vehicle turnarounds.

230.1 Route Deviation Standards

A route deviation is defined as any departure from the primary corridor of a route's operation.

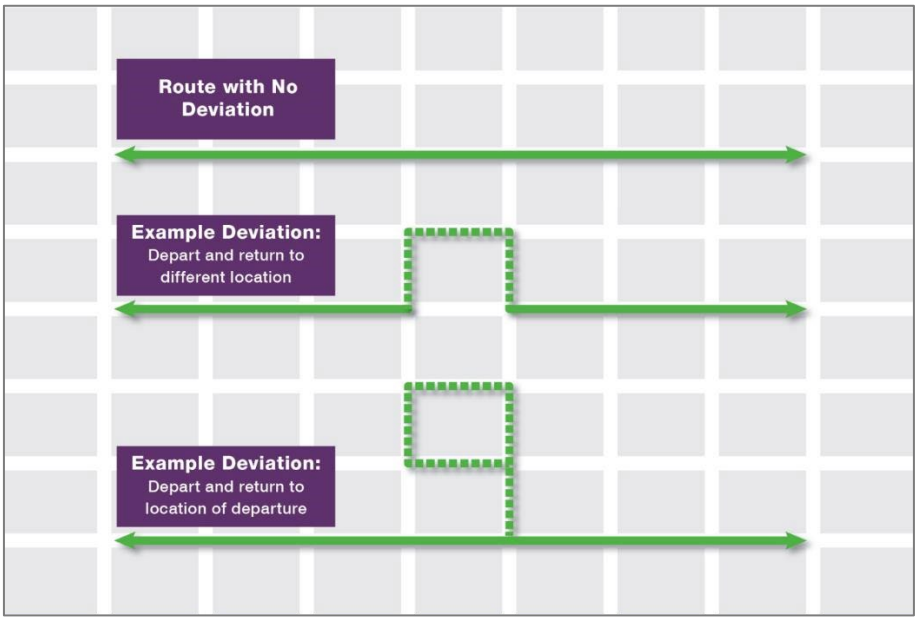
Route deviations typically occur between a route's termini using one of the following methods: 1.

Depart from and return to the primary corridor at the same location, or

2. Depart from and return to the primary corridor at a different location.

Figure 2 below depicts what is meant by route deviation.

Figure 2: Examples of Route Deviation



To maintain the integrity of the regional transit system's grid architecture and optimize route and system-level performance, new deviations on any existing regionally funded route or any new regionally funded route (local, key local, limited stop peak, and limited stop all-day) shall be avoided; however, a route deviation may be warranted if it is no greater than 1-mile or 5-minutes one-way (2mile or 10-minutes round trip), results in no more than a total of two deviations per route, does not require additional fleet (unless additional fleet has been prioritized for the service), and one or more of the following conditions are met:

- Connects to a light rail station
- Connects to a regional transit center
- Connects to an inter-modal transportation facility (i.e. passenger airport, greyhound terminal, etc.)
- Connects to another transit service at the route's end-of-line location
- Projected performance of deviation does not negatively impact the overall performance of the route under consideration

Other considerations for route deviations include:

- Determine if service delivery alternatives can effectively meet the purpose of the requested/desired fixed-route deviation. Examples include implementation of formal carpooling and/or vanpooling programs at employer sites or capital improvements such as pedestrian facility upgrades to better accommodate pedestrians between existing passenger stop locations and the targeted location for a potential fixed-route deviation.
- If a route is closer than one mile to a desired deviation, connecting the route with the shortest deviation required should be given consideration.
- Limit deviations by time of day or day of week to maximize transit efficiency and effectiveness.
- Avoid circulating through areas with potentially non-compatible land uses such as singlefamily residential areas that have homes facing the street. More compatible land uses include multi-family residential, government, commercial and industrial.

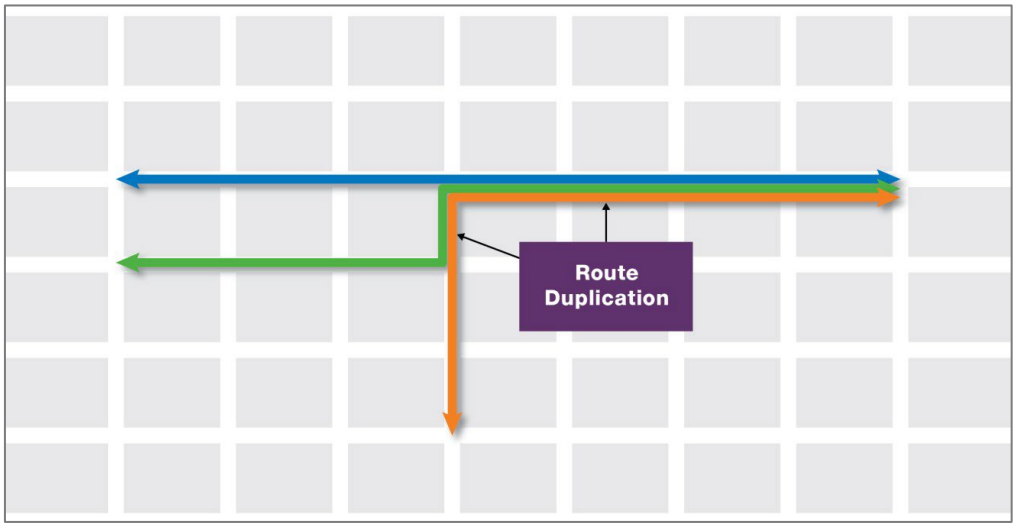
- Avoid circulating through or laying-over on private property unless other options are inefficient (excess circulation) or undesirable (incompatible land uses, inconvenient to rider). An agreement with the property owner and/or manager is required prior to the commencement of operations on private property.
- Operate on arterial and collector streets with sufficient lane width to accommodate a fullsize transit bus travelling in each direction at the posted speed.
- Left turns at unsignalized intersections should be avoided.

230.2 Route Duplication Standards

Route duplication is defined as the operation of two or more routes or services along the same street segment or on closely parallel streets (within one-quarter mile of each other) and is depicted in **Figure 3: Examples of Route Duplication**. Regionally funded transit services shall avoid route duplication; however, under the following conditions, route duplication may be warranted:

- Availability of a designated transit corridor (HOV lane, business access and transit (BAT) lanes, transit guideway, etc.);
- Access and egress to park-and-ride facilities, transit centers, rail stations, or inter-modal transportation facility;
- If duplicative routes provide enhanced frequency in a corridor or corridor segment where the performance of the individual routes can be maintained at a performing level;
- If duplicative routes have different stop spacing characteristics (for example, local bus and light rail operating within the same corridor provide access and egress at different intervals, which may be necessary to conveniently transport passengers to and from their desired origin/destination).

Figure 3: Examples of Route Duplication



230.3 Revenue Service End-of-Line Vehicle Turnarounds

Revenue-service vehicle turnarounds should avoid excessive circulation to maintain the transit system's grid architecture and minimize operating costs. However, without a facility to accommodate turnarounds at a route's terminus, excessive circulation may be necessary to maneuver vehicles into the proper position/location for return trips.

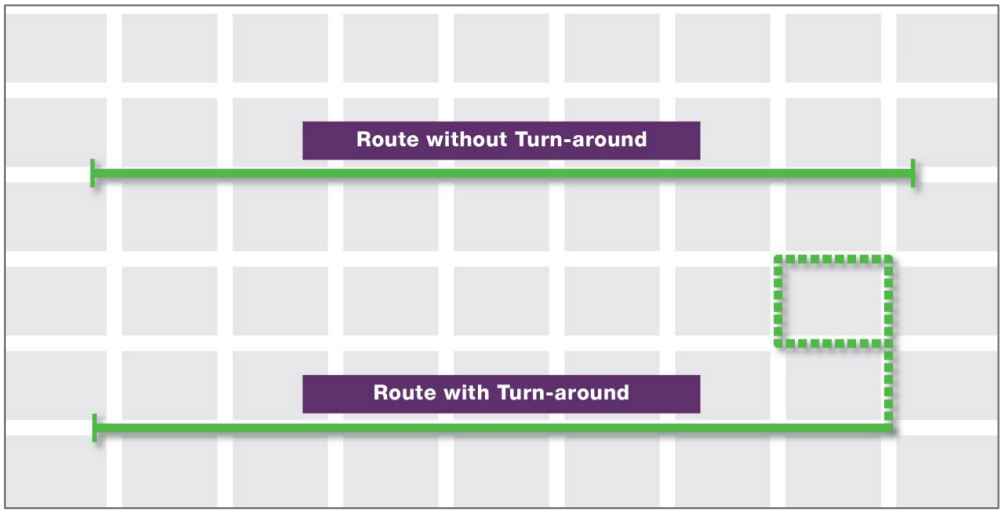
To minimize potential impacts to surrounding land uses and maximize operations and cost efficiencies, the shortest path of travel for revenue-service end-of-line turnarounds is desired. The following considerations are applied for the design of revenue-service end-of-line vehicle turnarounds on new regionally funded transit services or existing regionally funded transit services where the end-of-line location is being modified:

- Is there a dedicated transit facility (e.g. park-and-ride or transit center) within one mile of the designated route terminus that can accommodate off-street transit vehicle circulation and has the capacity to stage the quantity of vehicles being planned for the new service or service modification? If yes, the route shall be extended to the transit facility.
- If no dedicated transit facility exists to accommodate the end-of-line layover, the following considerations should be utilized to define a route's revenue-service end-of-line turnaround(s).

    - Operate on arterial and collector streets with sufficient lane width to accommodate a full-size transit bus travelling in each direction at the posted speed;
    - Avoid circulating through areas with potentially non-compatible land uses such as single-family residential areas that have homes facing the street. More compatible land uses include multi-family residential, government, commercial, and industrial; ○ Avoid circulating through private property unless other options are inefficient (excess circulation) or undesirable (incompatible land uses). An agreement between Valley Metro and the property owner and/or manager, obtained in cooperation with requesting member agency, is required prior to the commencement of operations on private property;
    - Consider routing that provides opportunities to accommodate interlining between transit routes, where possible, to reduce non-revenue miles (and turnaround segments).

Figure 4 below depicts what is meant by end-of-line turnaround.

Figure 4: Example of End-of-Line Turnaround



Procedures defining transit service standards have been adopted by the Valley Metro Board as TSPM application principles (see **Appendix B**: TSPM Phase II Final Report). This section outlines the procedures for new transit services and how they are prioritized.

240.1 New Transit Service Definition

New transit services include routes not currently in operation or any material service change (defined in the adopted TLCP policies as a 25% or greater change in a route's service level). As concepts for new services are identified, the process for assessing performance potential shall be applied to determine the recommended transit service type for implementation.

240.2 Regionally Funded Transit Services

New services are expected to meet the Board-adopted transit service standards upon implementation; however, exceptions shall be considered for weekend service levels. A new service may have limited weekend demand; therefore, weekend service standards may be relaxed until there is reasonable and sufficient demand to support weekend service above the lower performance threshold.

240.3 Locally Funded Transit Services

Consistency with adopted transit service standards as defined in **Table 4** above is recommended for all locally funded transit services; however, this is at the discretion of the local funding agency.

240.4 Relationship to TLCP

The implementation of all new services shall be consistent with the adopted TLCP policies, including jurisdictional equity, and the TSPM procedures identified herein.

240.5 Planning Process

New transit services identified by Valley Metro member agencies and Valley Metro staff shall be considered in coordination with the regional transit service planning process, which includes the following:

- Annual transit service performance review initiated through the SPWG;
- Annual update of the Valley Metro Five-year Short Range Transit Program, Fleet Management Plan and TLCP.

240.6 Local Service Planning Support

Valley Metro will provide planning support for locally funded/operated services at the request of the local jurisdiction. Upon request from a member agency, Valley Metro will review selected routes and/or proposed service changes to ensure the service request(s) adhere to the member agency's goals and TSPM standards. This review process will take place during SRTP production years (i.e. years one through three of the five-year SRTP). To help document the process, a request form has been produced so member agencies can clearly denote which services and changes they would like support evaluating. The request form is provided in **Appendix D**: Local Service Planning Support Request Form.

Using TSPM planning tools, route performance and optimization analyses will be conducted for the review. The results of the service change(s) analysis will be presented to the member city in the form of a short summary report that includes:

1. Name of requesting agency
2. Service assessment request
3. Description of proposed services
4. Performance review (TSPM quartiles)
5. Applicable transit tool evaluation and route optimization (for alignment and segment)
6. Summary of observations and recommendations.

Similar to Transit Implementation Studies, member agencies can elect to advance or decline the assessment results/recommendations. Should the member agency elect to advance the service change(s), the SRTP list of recommendations will be updated.

240.7 Prioritization of New Transit Services

In the event that the number of requests for new service exceeds the amount of regional funding and/or capital support infrastructure (revenue vehicles) available, implementation of services shall be prioritized as follows:

1. First, consistent with adopted TLCP policies, determine if there is available jurisdictional equity within the communities to be served by the proposed new service. This information is available from and maintained by Valley Metro.
2. The second level of evaluation includes determining if the proposed new service is included in the RTP (consistent with adopted TLCP policies and TSPM Service Provision Goal #1).
3. The third level of evaluation includes an assessment of potential performance using the planning tools associated with TSPM Service Provision Goals #2 and #5. These tools include transit service connectivity, population density, employment density and activity centers served, zero-auto households, low-income population, elderly persons, youth (under the age of 16), and people with mobility disabilities. See **Table 9** for a complete list of planning tools. The performance potential assessment for each proposed service improvement will be conducted collaboratively with the affected local jurisdictions to be used as a decision-making aid.

240.8 Implementation Standards for New Transit Services

Implementation standards or thresholds are to be used to classify the service type of any proposed new transit service. Implementation standards use performance-based quantitative and qualitative measures to classify potential services planned or programmed to be implemented within five years. A brief description of the implementation standards for each service type is summarized in **Table 6**. A complete description of the implementation standards for new services is provided in **Appendix B**: TSPM Phase II Final Report.

Table 6: Implementation Standards (Thresholds) for New Transit Service

Service Type	Thresholds for New Services
Vanpool	▪ Serves groups of 6 to 15 persons with a common destination ▪ Provides a commuter express-type option for limited-demand worksites not necessarily located within one of the top 10 regional employment centers

Demand Response/Flex Route	▪ Serves low-density (4 DU/Acre or lower) areas without fixed-route transit service or other available transit service options ▪ Can help build future demand for local transit market
Rural Connector	▪ Connect a rural community into the regional transit network ▪ Based on market demand
Community Circulator	▪ Based on market demand ▪ Routing structure connects neighborhoods to local or regional activity centers and resources ▪ Proposed new routes that are generally less than 10 miles in length that fall below the projected boardings per revenue mile for local service would be a candidate for community circulator standard of service, to help build a future market for transit use
Local	▪ Projected boardings/revenue mile > 90% of bottom quartile threshold
Key Local	▪ Projected boardings/revenue mile > 90% of bottom quartile threshold
Limited Stop Peak	▪ Key local service operating in corridor has boardings/revenue mile ≥ top quartile threshold ▪ Demand exceeding capacity on existing services in corridor **OR** ▪ Existing commuter-based market on a non-freeway corridor ▪ Estimated 6,400 person trips in market ▪ Corridor greater than 8 miles in length ▪ Serve top 10 regional employment center
Service Type	**Thresholds for New Services**
Limited Stop All Day	▪ Key local service operating in corridor has boardings/revenue mile ≥ top quartile threshold ▪ Demand exceeding capacity on existing services in corridor
Commuter Express	▪ Must serve a top ten employment district ▪ Existing commuter-based market on a freeway corridor ▪ Estimated 6,400 person trips in market ▪ Corridor greater than eight miles in length
Streetcar	▪ Determined through the completion of corridor-specific transit planning studies and through incorporation into the Regional Transportation Plan
Bus Rapid Transit	▪ Determined through the completion of corridor-specific transit planning studies and through incorporation into the Regional Transportation Plan
Light Rail	▪ Determined through the completion of corridor-specific transit planning studies and through incorporation into the Regional Transportation Plan

240.9 Transit Propensity Tool Modification

In an effort to improve route outcome forecasting capabilities Valley Metro has undergone a retooling of its current propensity model, which is used to model performance of new transit service. The previous three coefficient based model served well to provide a relative comparison of prospective success for realignments and future routes, however alternative statistical methods allow for fewer errors in predictions.

The current model estimates ridership by comparing total population, low income population and no-car household counts to ridership in a corridor. Estimates from this system inform efforts to improve underperforming routes, and rank proposals for funding among other uses. This proved useful for the relative comparison of routes/proposals in an effort to gauge a proposal's worthiness for funding, but needed greater accuracy to predict absolute ridership in a route.

In an effort to improve the model, staff reviewed a new methodology proposed by Harvard doctoral students. Using their proposed methodology of multivariate linear regression on corridor specific demographics Valley Metro experimented with several iterations of a model and designed a new tool. The new methodology uses several variables and more granular data to produce ridership predictions with significantly greater accuracy. Additionally, this methodology allows for the flexibility of adding and removing variables to increase predictive capacity over time as new data sources come online or regional dynamics change. Going forward this tool will be used in predicting ridership for route additions, realignments and SRTP Fleet priority ranking. The annual SRTP reports display the propensity tool methodology with the latest variables, should the model be updated between now and the next TSPM update. Details of the methodology can be found in **Appendix E**: Transit Propensity Tool Methodology Update Memo .

241.0 - Frequency Assessment Standards for Transit (FAST)

While the transit propensity tool is useful in forecasting new transit service performance, an additional planning tool has been developed to evaluate routes and corridors in the existing network that may warrant higher frequency. Frequency Assessment Standards for Transit (FAST) offers a set of thresholds and guidelines that can be used to assess individual transit corridors that are the best candidates for Frequent Service span and headway investments, as well as a snapshot of how a set of corridors could function together as a Frequent Service network.

The FAST model framework is similar to the propensity tool framework and considers eight inputs as part of the analysis. **Table 7** shows the inputs, its source, corresponding route catchment area, a 1/2mile buffer around each route, or the study area, and the factor used in the model. The data was chosen based on its correlations with ridership on a route level. The data chosen had highest correlation with ridership and was well supported by academic literature. For complete details on how the FAST tool was developed please reference **Appendix F**: Frequency Assessment Standards for Transit Final Report**.**

Table 7: FAST Model Framework

Factor	Study Area	Data Source	Output
Population	1/2 mile of route	U.S. Census Bureau, ACS 2016, Block Groups	Population/ Square Mile

Jobs	1/2 mile of route	U.S. Census Bureau, ACS 2016, Block Groups	Jobs/ Square Mile
Low Income Jobs	1/2 mile of route	U. S. Census Bureau, Longitudinal Employer Household Dynamics Data	% of Total Jobs
Network Connectivity	Route connections	Valley Metro	Sum of weekday route miles of each route crossed, normalized by their length
Low Income Population	1/2 mile of route	U.S. Census Bureau, ACS 2016, Census Tracts	% of Total Population
Minority Population	1/2 mile of route	U.S. Census Bureau, ACS 2016, Block Groups	% of Total Population
Boardings Per Revenue Mile	Each route	Valley Metro	Average boardings per revenue mile
Zero Vehicle Households	1/2 mile of route	U.S. Census Bureau, ACS 2016, Census Tracts	% of Total Population

Table 8 below shows how the inputs are normalized and the resulting percentage that essentially ranks routes amongst each other according to these inputs. Routes scoring below the service area average are given 5 points, routes scoring between 100 and 149% of the service area average are given 10 points, and routes that score 150% and above are given 20 points. For each of the routes, their scores are ranked by productivity, transit equity, and finally a composite of the two (productivity and transit equity) combined. The productivity category is determined by the following factors: population, jobs, network connectivity and boardings per revenue mile. The transit equity is determined by the following factors: low income jobs, low income population, zero-vehicle households, and minority population.

The composite ranking has all eight of these factors weighted equally.[8] Routes are then ranked by their scores, from highest to lowest.

Table 8: FAST Normalized Inputs

Population	(Population/Square Mile) / (Service Area Average of Population/Square Mile for 60 Local Bus Routes) = [0 to 150+] %

[8] Several different weighting criteria, based on peer research, were discussed with the TSPM working group. The criteria fell into two categories for the variables: those measuring route productivity and those measuring equity/need. After looking at model run outcomes for current routes (for these two categories) and seeing which outcomes mapped best onto our understanding of the transit system and of what warranted more service, there ended up being very little variation on the model runs, with the exception of one or two routes. The variations were partially a product of the correlation between variables across the categories, like high population areas also often having high minority and low income populations simply because there are more people there. Because the variation was minimal, instead of having people assign weights based on local preference, it was decided to keep weighting neutral for all variables.

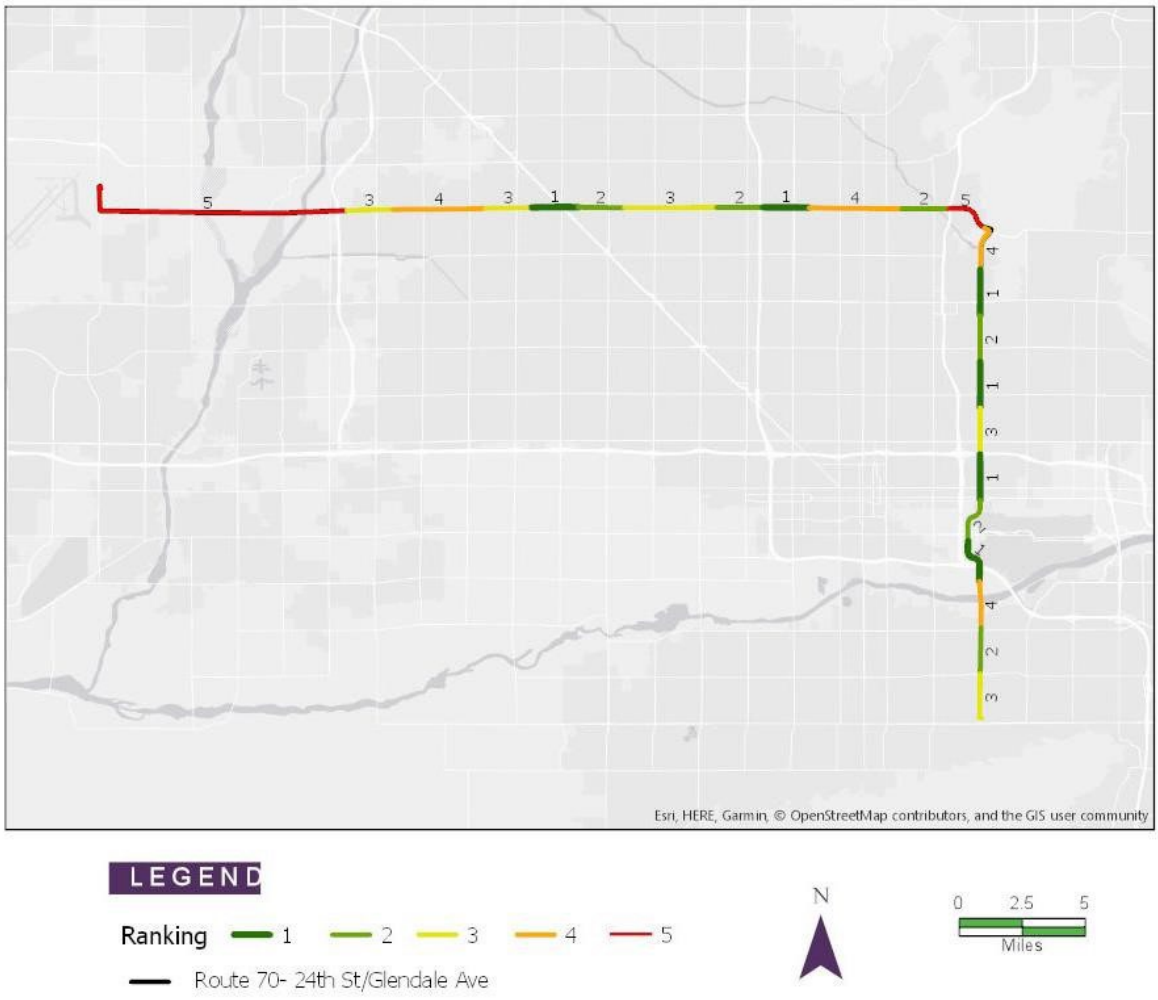
Jobs	(Jobs/ Square Mile) / (Service Area Average of Jobs/Square Mile for 60 Local Bus Routes) = %	
Low Income Jobs	(Low Income Jobs/Total Number of Jobs) / (Service Area Average of Low-Income Jobs/Total Number of Jobs for 60 Local Routes) = %	Between 0 and 99% = 5pts
Network Connectivity	(Sum of weekday route miles of each route crossed, normalized by their length) / (Service Area Average for all 60 routes) = %	Between 100 and 149% = 10 pts
Low Income Population	(Low Income Population / Total Population) / (Service Area Average of Low Income Population / Total Population for all 60 Bus Routes) = %	More than 150% = 20pts
Minority Population	Minority Population/ Total Population) / (Service Area Average of Minority Population/ Total Population for all 60 Bus Routes) = %	
Boardings Per	(12-month average boardings per revenue mile) / Revenue Mile (Service Area Average for all 60 routes) = %	
Zero Vehicle Households	(Zero Vehicle Households/ Total Number of Households) / (Service Area Average of Zero Vehicle Households for all 60 Bus Routes) = %	

It is likely that some of the top ranking routes identified by FAST analysis will already have frequent service. Since these routes are already frequent, there will likely not be a compelling reason to recommend them for frequency increases; however, future higher demand could change that. At this time, these routes should be omitted from further analysis.

As it may not be appropriate to increase the entire length of a route to frequent service, FAST analysis on the corridor level for the remaining identified routes is recommended. A corridor level analysis evaluates a single route broken down into roughly one-mile long segments. It involves the same methodology described above except that network connectivity is the removed from the model, as this is a route level measure and should be used for entire routes. As depicted in

Figure 5, the corridor segments for Route 70 are ranked amongst themselves and there is no comparison to other routes in the network.

Figure 5: Route 70 Corridor Analysis



300 – Transit Service Performance Measures and Evaluation Process

Transit service performance measures gauge how well a transit service is meeting Valley Metro's adopted transit service provision goals and objectives (see Section 110). This section provides a description of the adopted Valley Metro transit service performance measures and performance evaluation process and is organized into the following subsections:

- 310 – Transit Service Performance Measures and Planning Tools
- 320 – Transit Service Performance Measures Thresholds
- 330 – Transit Service Performance Measures Procedures

310 – Transit Service Performance Measures and Planning Tools

Transit service performance measures are intended to assess the effectiveness of transit operations in achieving the adopted service provision goals, and help identify whether performance improvement actions taken to enhance performance and productivity are effective. The Board-adopted transit service performance measures are intended to be applied separately for each transit service type (see Section 210). In addition to the Board-adopted transit service performance measures, planning tools have been developed to assist with detailed evaluation of existing services/operations or to assess the potential performance of new or expanded services being contemplated. The adopted transit service performance measures and planning tools are listed in **Table 9**.

Table 9: Transit Service Performance Measures and Planning Tools

Performance Measures	Planning Tools
▪ **Boardings/revenue mile** ▪ **Boardings/revenue trip*** ▪ **Farebox recovery rate** ▪ **On-time performance**	▪ Boardings by stop ▪ Boardings by time of day ▪ Service connectivity ▪ Subsidy per boarding ▪ Zero-auto households served ▪ Low-income households served ▪ Elderly persons served ▪ Youth served ▪ People with mobility disabilities served ▪ Peak load factor ▪ Headways/trips ▪ Service span ▪ Operating days ▪ Population density ▪ Employment density ▪ Activity centers served ▪ *Boarding to peak fleet ratio*** ▪ *Employed and student population***

Performance Measures	Planning Tools
	▪ *Weekday average boardings*** ▪ *Percent time point dwelling*** ▪ *Average dwell per time point*** ▪ *Peak speed*** ▪ *Off-peak/peak speed ratio*** ▪ *FAST Route Analysis***

For commuter express and limited stop peak services only

New planning tool

As part of this TSPM update, the boardings per revenue hour metric has been removed from the list of performance measures. The TSPM Technical Advisory Group (TAG) reviewed and evaluated potential replacement metrics, but ultimately decided to remove the metric without a replacement at this time. Reasons for removing the boardings per revenue hour metric include:

1. Fixed route transit operations contracts Valley-wide are per vehicle revenue mile and not pre revenue hour.
2. The boardings per revenue hour key performance measure is duplicative of boardings per vehicle revenue mile.
3. Given the breadth of service hours in the region per vehicle revenue hour analysis is more applicable as a planning tool and not key performance measure.

In addition to the FAST tool described in Section 250.0, potential replacement metrics that are instead being adopted as additional planning tools include:

- **Boardings to peak fleet ratio** – Calculated as the number of average weekday boardings divided by the fleet required by route during weekday peak.
- **Employed and student population** – Calculated using American Census Survey data, with a 1/2 mile buffer at the block group level around route. Proportions not used, only whole block groups.
- **Weekday average boardings** – Calculated using Valley Metro ridership data.
- **Percentage of time point dwelling** – Calculated using Valley Metro monthly on-time performance data. Counts percentage of time points where a vehicle arrives more than a minute early than its scheduled time.
- **Average dwell per time point** – Calculated at the total amount of dwell time at all route time points divided by the number of all time point arrivals.
- **Peak speed** – Calculated using General Transit Feed Specification (GTFS) data and schedule times by dividing the revenue miles and hours in peak periods.
- **Off-peak/peak speed ratio** – Calculated as the ratio between the average peak speeds and the average speed during mid-day.

Table 10 below provides an overview of the focus categories to which the additional planning tools are applicable. Those categories are “system,” as in system-wide evaluation; “route optimization,” referring to the evaluation of a particular route; and “customer,” referring to tools that are focused on customer satisfaction.

Table 10: Focus Categories for Additional Planning Tools

Additional Planning Tools	Focus Categories		
	System	Route Optimization	Customer
Boarding to Peak Fleet Ratio	X		
Employed & Student Population	X		X
Weekday Average Boarding	X		
Percent Time Point Dwelling			X
Average Dwell at Time Point			X
Ridership by Peak Fleet Ratio		X	
Peak Period Speed			X
Peak vs. Off-peak Speed	X	X	X
FAST	X		X

310.1 Frequent and Late Night Service Maps

In addition to the planning tools outlined above, two new corridor designations have been established in this update. In previous phases, TSPM concerned itself with setting minimum standards and codifying procedures for targeted improvement. These new designations, Late Night and Frequent Service, are distinct in that they dictate a service standard that is exceptional rather than minimal. From a public perspective, navigating multiple schedules and maps to deduce broader network characteristics can be quite difficult, so producing simplified outputs addressing concerns of convenience, reliability and span would be useful marketing tools. This is especially true for a large system such as ours.

Frequent and Late Night Service Maps highlight corridors providing exemplary service either for their span, or their frequency. They are not a baseline, and routes will ***never*** be penalized for not being designated in either category. These designations signify a high level of service and provide a regional standard for improving routes already meeting minimum standards. Beyond their value as a planning tool to visualize the growing robustness of the network, they will serve as excellent marketing materials for choice riders and those requiring late night services to show the extent of late or frequent service beyond their familiar neighborhood.

Due to the difference in transit service types, Frequent Service maps were developed for local/circulator bus routes as well as Express/Commuter Routes. For local and circulator bus routes, Frequent Service is defined as routes with headways of 15 minutes or less from at least 6 a.m. – 6 p.m. on weekdays. Frequent Express/Rapid Service is provided by commuter routes with 8 or more inbound trips and 8 or more outbound trips on weekdays. Finally, Late Night Service is defined as any service running at least one full trip in both directions after midnight

Monday through Friday. **Figure 6** and

Figure 7 demonstrate the Frequency Service maps by service type and **Figure *8*** depicts the Late Night Service map.

Figure 6: Local and Circulator Bus Frequent Service Map (October 2018 Bid)

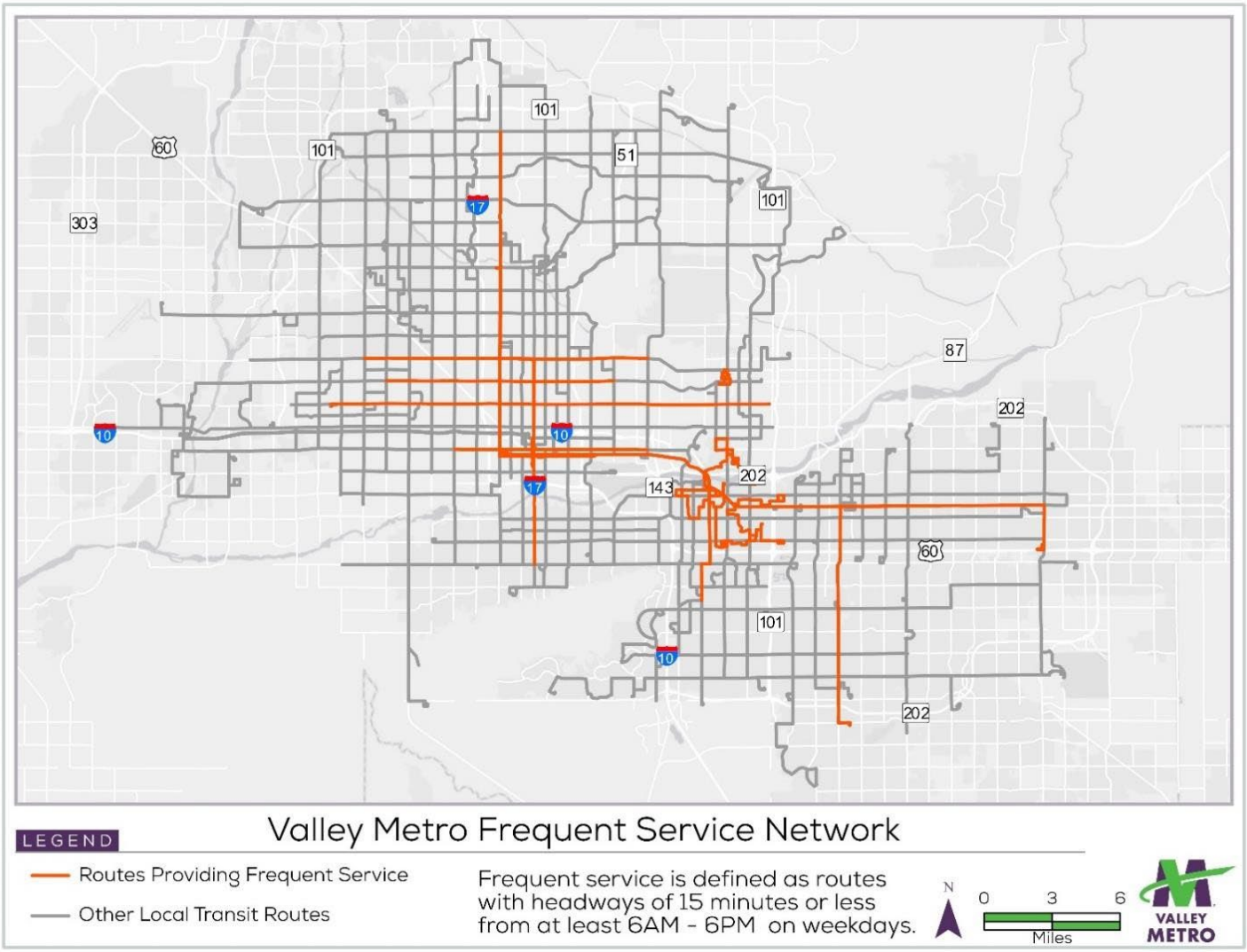


Figure 7: Express/Rapid Frequent Service Map (October 2018 Bid)

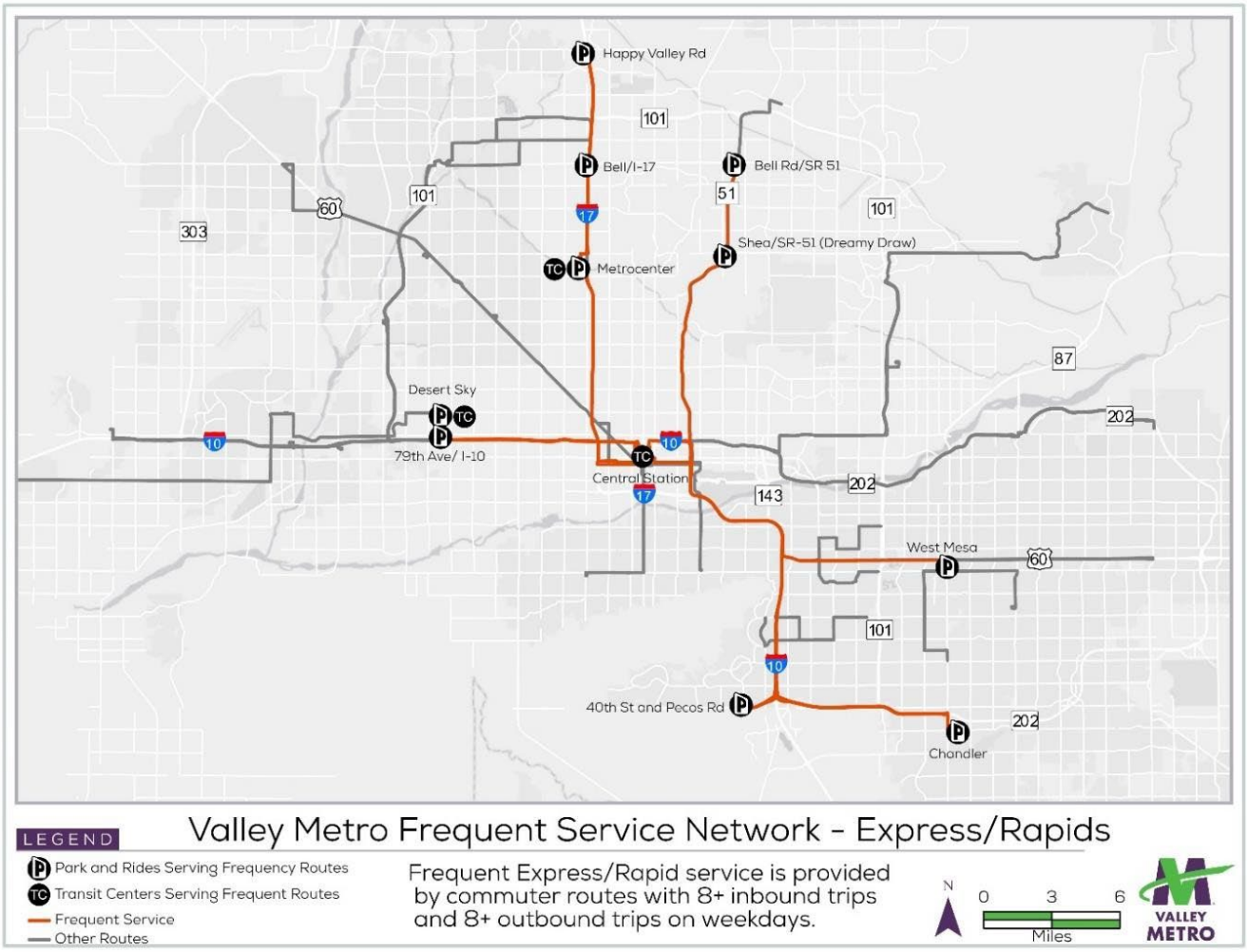
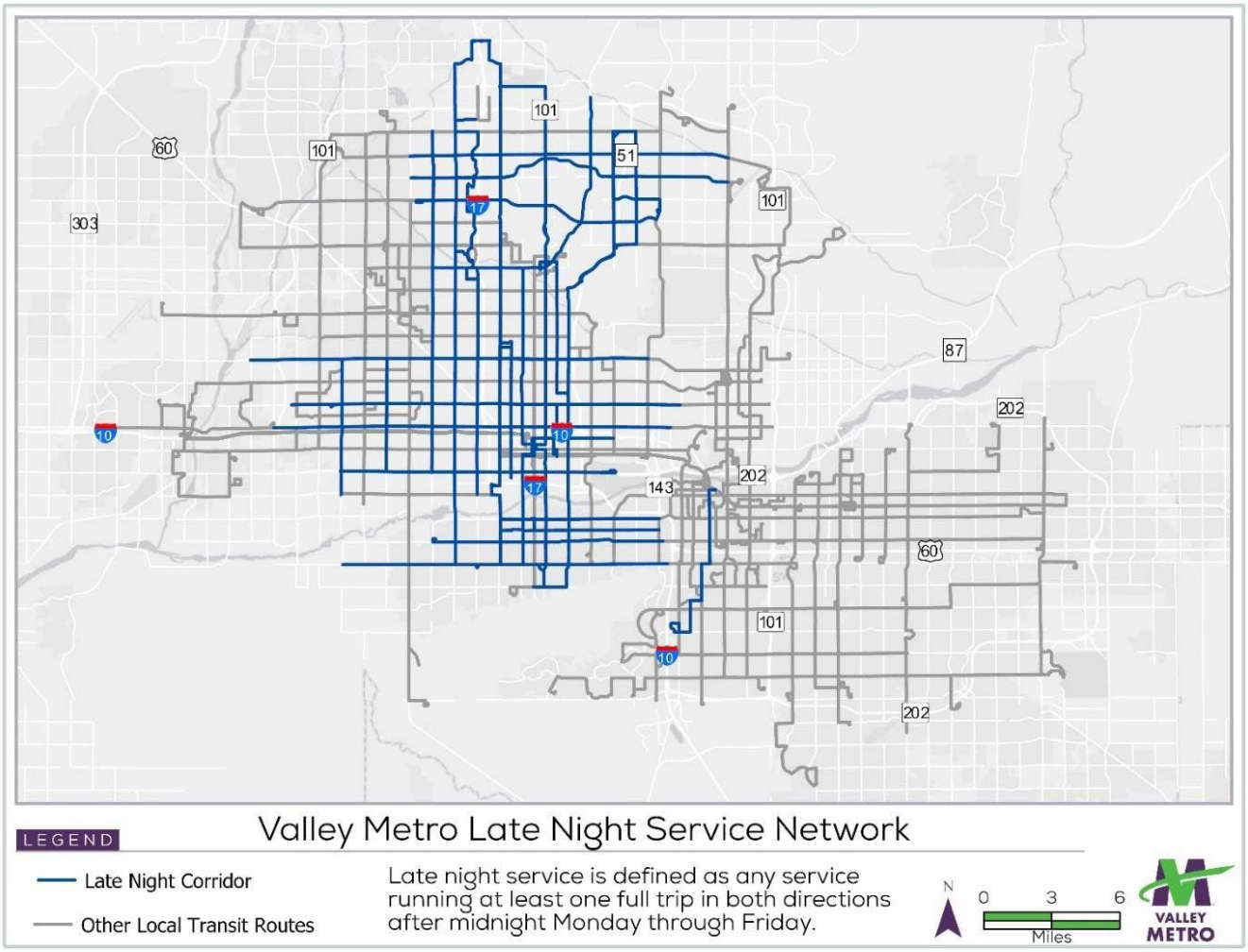


Figure 8: Late Night Service Map (October 2018 Bid)



310.2 Fixed Route Benchmarks

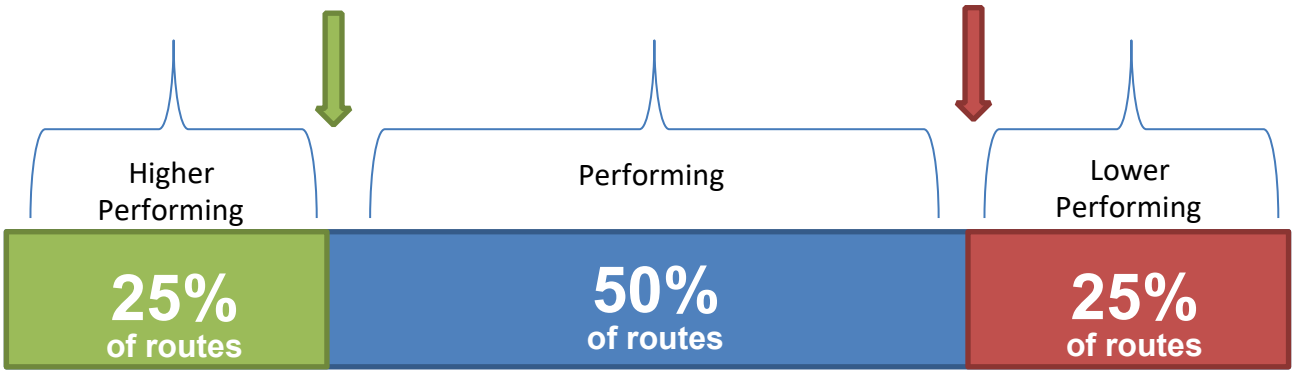
As a high-level measure of system-wide performance and as part of the TSPM process, Valley Metro will review and report on the overall health of transit in the region through metrics used in the Transit Performance Reports (TPR). The metrics include boardings per year, revenue miles per year, and boardings/revenue mile. Used as benchmarks, the metrics will help measure year to year changes on a network level and bring attention to larger regional trends. Boardings per capita, miles traveled per capita, and the growth of the Late Night and Frequent Service maps can also be used as planning tools to support the system-wide review. Taking a system-wide perspective can in turn help Valley Metro and its member agencies evaluate how regional changes to policies, funding, economic health, service delivery models, etc. may be impacting the system.

320 – Transit Service Performance Measures Thresholds

Transit service thresholds serve as a tool for comparing and measuring the relative performance of individual services/operations by transit service type. The transit service performance thresholds developed by Valley Metro rely on a numerical ranking of each performance measure for each route or service within their respective service type category. Thresholds are established at quartile breakpoints

for each transit service type to identify the top 25% and bottom 25% performers. **Figure 9** illustrates the quartile-based performance thresholds.[9]

Figure 9: Transit Service Performance Thresholds



330 – Transit Service Performance Measures Procedures

Procedures for the application of regional transit services performance measures that have been adopted by the Valley Metro Board are summarized in the subsections below.

330.1 Performance Evaluation Frequency

All routes or services operated within the region, regardless of operating agency or funding source, shall be reviewed annually using the three performance measures and performance thresholds.

330.2 Applicable Services to be Evaluated

Locally operated and funded transit services, regardless of funding source used for fleet procurement, shall be included in the performance measurement process, but the development and implementation of local performance improvement actions are the sole discretion of the associated local jurisdiction. However, all light rail service adjustments are subject to action by the Valley Metro Rail Board of Directors, even though the operation is funded by the local jurisdictions.

330.3 Definition of "Performing" Transit Service

A route is designated as "performing" if it has no more than one performance measure ranked in the bottom quartile by service type.

330.4 Performance Attainment for New Services

New services or material service changes (as defined in the adopted TLCP policies) to an existing route are expected to attain a "performing" level within three years of implementation. If the service

[9] The route performance analysis is published in the annual Short Range Transit Program (SRTP) available at https://www.valleymetro.org/short-range-transit-program

has not attained a "performing" level within the first three years of operation, performance improvement actions shall be identified and applied to help improve service performance for one or more measurements. A new service will not be eliminated based on performance level within the first two years of operation.

If after three years from initial implementation, the service has still not achieved "performing" status or showing improvement, Valley Metro and staff from the affected jurisdiction(s) shall work together to determine if the route will be further modified, eliminated, or remain in service. If it is agreed that the service will be eliminated, Valley Metro and the affected local jurisdiction(s) staff shall identify alternative uses within said jurisdiction(s) for any funding saved by eliminating the route.

Services that do not achieve a "performing" level after three years of continuous operation, but are showing improvement in one or more performance-measurement category, shall continue to be monitored and evaluated to determine if there are any additional performance improvement actions that can be implemented.

330.5 Performance Attainment for Existing Services

Existing services that do not meet service standards, but are "performing", are not required to be modified to become compliant with the established service standards.

330.6 Determination of Service Evaluation

Routes or services that are operated by Valley Metro and/or funded, all or in part, by legislatively authorized Valley Metro regional transit funds (currently includes the Public Transportation Fund and Arizona Lottery Fund) that are within the top 25% or bottom 25% (by service type) of any two of the three performance measures identified in **Table 9** (Section 310.0) will be further evaluated using the planning tools (also identified in **Table 9**) or other relevant qualitative or quantitative metrics (e.g. service evaluation by day of week).

330.7 Data Accuracy

Prior to conducting additional performance evaluations of the top 25% or bottom 25% routes (by service type), the performance data shall be reviewed for accuracy. If further review of the data identifies that it is inaccurate and the route is, in fact, "performing," then no additional evaluation shall be conducted for that service.

330.8 Determination of Performance Improvement Action

Based on the additional evaluation of the higher performing and lower performing routes/services, potential performance improvement actions shall be identified cooperatively with all affected jurisdictions/agencies, and later, discussed with the Valley Metro SPWG. As applicable, performance improvement actions are submitted for Valley Metro Board approval through the bi-annual service change process and annual Transit Life Cycle Program (TLCP) update process.

330.9 Types of Performance Improvement Actions

Performance improvement actions may include targeted marketing, schedule adjustments, frequency, service span and days of operation adjustments, and rerouting (including route extensions and route segment terminations).

330.10 Unsuccessful Performance Improvement Actions

If performance improvement actions prove to be unsuccessful (i.e. they did not improve performance in one or more performance measurement category), potential reinvestment of resources into other services within the same jurisdiction(s) shall be collaboratively explored with the affected jurisdiction(s) to maintain jurisdictional equity as defined by the adopted TLCP policies, and if agreed to, submitted to the Valley Metro Rail Board of Directors (if applicable) and/or the Valley Metro RPTA Board of Directors for possible action.

400 – Bus Stop Optimization Process

The Valley Metro bus network consists of over 7,650 bus stop stops dispersed over 1,140 square miles. The stops vary greatly by size, design, and amenities included. According to the 2015 Origin and Destination (O&D) Survey, 89.2% of bus riders accessed the system by walking, 5.4% drove to or were dropped off at the stop, and 3.6% accessed the system by bike[10]. The O&D survey also found that 83% of bus riders that walk reported walking up to two blocks to get to transit. Optimizing bus stop locations is not only essential for maintaining and improving system accessibility, but also because stop locations have capital maintenance cost and vehicle speed impact implications that impacts the customer experience.

The stop spacing standards contained within this document (Section 220) categorize stop spacing by transit service type to better guide member agencies in their stop placement decision-making process. Transit service types that provide localized operations typically have passenger stops more frequently spaced in contrast with limited stop services, where passenger stops are provided at greater distances. Minimum passenger stop spacing, which were outlined in Section 220 (**Table 5**), has been adopted for the applicable transit service types. Passenger stop spacing standards represent minimum spacing distances; however, where development patterns are of higher or lower density than typical within the region, an exception to the adopted standard may be warranted.

Furthermore, Valley Metro's Bus System Handbook is being updated to identify key areas where stops should be provided, noting places such as employment and retail centers, education centers, and major medical centers with out-patient care. The guidelines will outline general stop spacing based on population densities and the distance a person has to travel to access a bus stop. Please refer to the 2019 Bus System Handbook for specific details.

While the guidelines provide a foundation for identifying bus stop locations, they lack parameters to optimize existing stops. As a result, a more in-depth process for optimizing bus stop locations has been developed as part of this update.

Bus stop optimization involves a careful evaluation of the distance between *existing* stops and the purpose, quality, and effectiveness of them. If stops are placed too far apart, it reduces the ability of patrons to access the system. If stops are too close together, it slows down travel for those already on the bus. Thus, stop optimization is about finding the balance between access to service and service speed.

[10] https://www.valleymetro.org/sites/default/files/uploads/event-resources/20142015_onboard_survey_final.pdf

In order to develop a bus stop optimization process, Valley Metro conducted peer research and undertook a collaborative engagement process with the SPWG. The primary agency Valley Metro reviewed for guidance on developing an agency-specific process was the Maryland Transit Administration (MTA). MTA defines bus stop optimization as an on-going process that analyzes the placement and design of all bus stops in the network and includes the following actions:

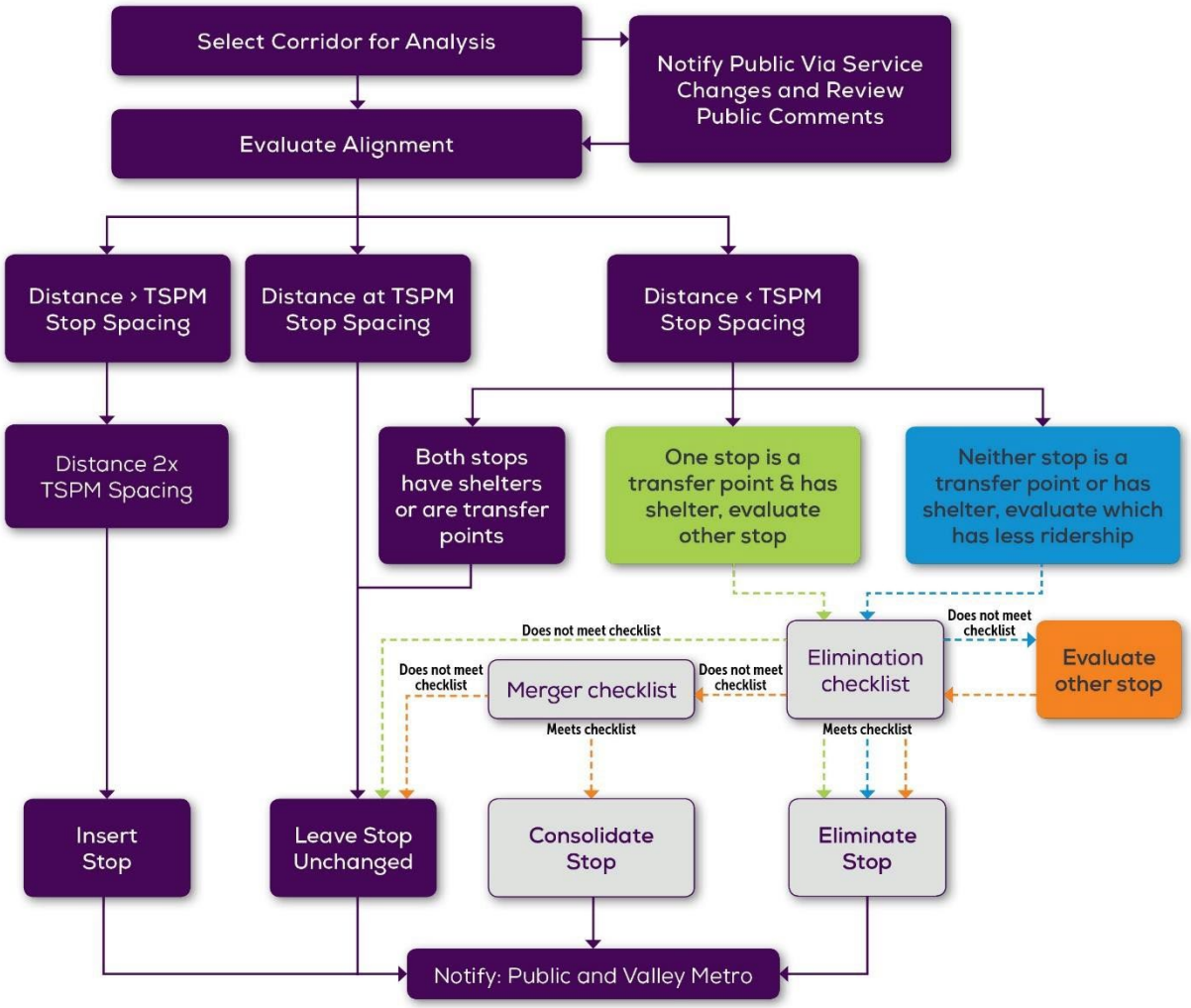
1. Consolidating (removing) existing, redundant bus stops,
2. Adding new bus stops where needed, and
3. Relocating existing stops for safety and operational improvements[11]

Stop optimization is intended to improve the quality and reliability of bus service while still providing adequate access to riders. Safety, utilization, transfer points, and site conditions are all important factors to consider throughout the optimization process.

The Bus Stop Optimization Process specifically developed for Valley Metro and its member agencies is depicted in **Figure 10** below. It starts with selecting a corridor for analysis and notifying the public for comments. The first level of evaluating the alignment looks at the distance of stop spacing as compared to the TSPM Stop Spacing Standard. For stops greater than twice the standard, a new stop should be inserted between the two. If stops are closer than the recommended TSPM Spacing Standard, stops are evaluated on whether they have a shelter and/or are transfer points. If a stop does not have a shelter and is not a transfer point, it is considered for elimination.

[11] https://mta.maryland.govcontent//bus-stop-optimization

Figure 10: Valley Metro Bus Stop Optimization Process



At this point, two evaluation checklists are built-in to the Optimization process to help determine if a stop should be removed. The Merger Checklist and Elimination Checklist depicted in **Figure 11** provides a series of criteria questions that if are answered affirmatively make a stop eligible for elimination. The checklists include criteria related to the TSPM Spacing Standard, access and ADA guidelines, ridership, transfer opportunities, and trip generators. Once a stop has been evaluated through these checklists, it is either eliminated or consolidated and the public is notified of any change.

Figure 11: Merger and Elimination Checklists[12]

Merger Checklist	Elimination checklist
Yes answer to all criteria makes a stop eligible for merging:	**Yes answer to all criteria makes a stop eligible for elimination:**
• Does the new stop location meet ADA guidelines or can it reasonably modified to meet ADA guidelines? • Does the new stop location have pedestrian access? • Does the new stop location meet TSPM spacing requirements? • Will transfer opportunity be retained at the new/merged stop or at an adjacent stop along the line? • Do the stops not under consideration for merging not serve 20% or more of the entire routes the route's daily ridership? • Is the stop being considered for merging not serve key community services such as schools, hospital, senior center, and public service offices (e.g. AZ DES)	• Do the remaining/adjacent stops meet TSPM spacing? • Can the remaining/adjacent stops absorb additional ridership? • Does the stop not provide direct access to connecting transit routes, or do adjacent stops provide same connection to transit routes? • Does the stop not meet ADA guidelines, and the remaining/ adjacent stops meet ADA guidelines? • Does the stop serve less than 10% of the route's daily ridership? • Does the stop not serve key community services such as schools, hospital, senior center, and public service offices (e.g. AZ DES)?

500 – Regional Fleet Prioritization Process

Transit services are adjusted and service expansion proposals are submitted through the Short Range Transit Program (SRTP). However, given the finite quantity of vehicles available in the region and the length of time required to procure expansion vehicles, not all service adjustments or expansion needs may be accommodated with available fleet in a particular year. As such, prioritization processes have been identified for existing and expansion fleet should requests for vehicles exceed the quantity available. This section describes these processes and is organized into the following subsections:

- 510 – SRTP Methodology (Modified)
- 510 – Prioritization Process for Existing Fleet
- 520 – Prioritization Process for Expansion Fleet
- 530 – Fleet Procurement and Programming Process

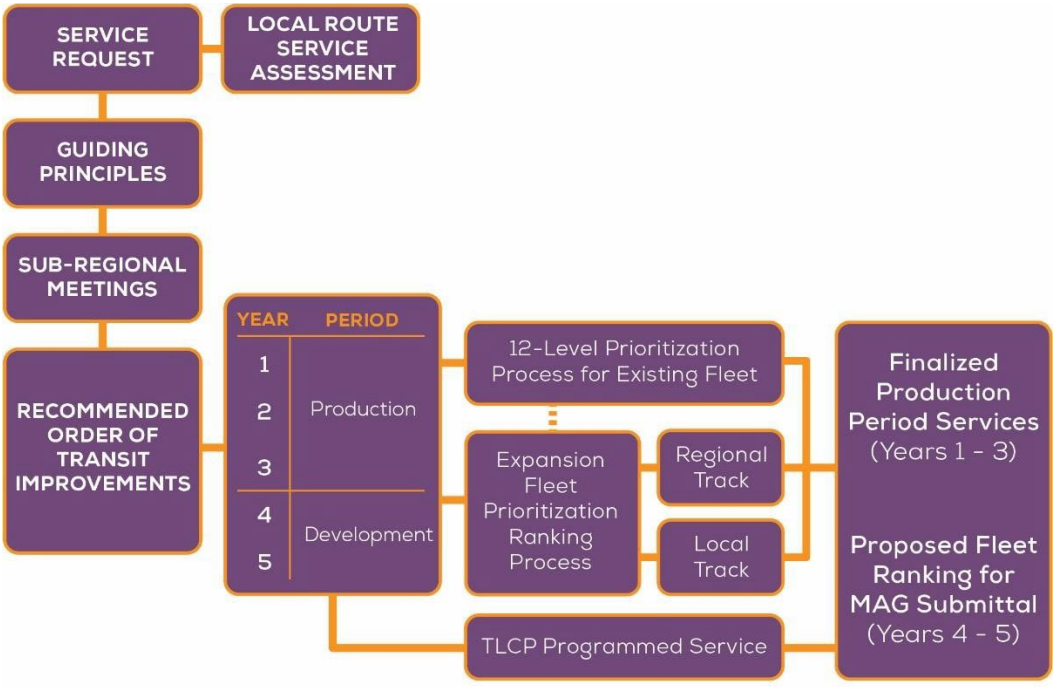
510 – SRTP Methodology

The SRTP is a five-year program aimed at the regional coordination of locally and regionally funded transit service changes. It has previously been divide into two phases identifying production phase as years 1-2, and development phase as years 3-5. In order to better understand required fleet needs, minimize confusion on immediate fleet needs, and to better coordinate the fleet prioritization process with the regional TIP, the production phase has been expanded to occur in years 1-3 and the development phase will occur in years 4-5 of the STRP process. A funding commitment letter will still be required on locally funded services that require new fleet, the commitment letter signed by the city's City Manager or Transit/Transportation Department Director must be provided subsequent to the sub-regional SRTP meetings.

[12] Valley Metro's Bus Stop Design Guidelines discuss in greater detail the placement of bus stops and applicability of bus pullouts, transfer points, etc.

Figure 12 depicts the modified SRTP process, which includes the change in production and development years, and addition of the Local Route Service Assessment form and process (described in Section 240.6).

Figure 12: Modified SRTP Process



510 – Prioritization Process for Existing Fleet

Service adjustments in the production years (1-3) of the SRTP are ranked using the 12-level prioritization process for existing fleet. The 12-levels apply priorities to elements such as funding source, type of service adjustment and purpose of the service adjustment. The 12-level prioritization process for existing fleet is summarized in

Figure *13* below.

Figure 13: 12-Level Prioritization Process for Existing Fleet

Service Adjustment	Purpose	Rank Level
Implement TLCP-programmed service as scheduled	Implement TLCP-programmed service	1
Early implementation of programmed service as scheduled in TLCP	Addresses performance-based fleet need (high ridership or running-time adjustment)	2
	Will enhance regional transit connectivity (connect one or more routes)	3
	Will reach potential ridership generator	4
Implement TLCP-planned service	Implement TLCP-planned service	5
Locally funded expansion of an existing route funded through the TLCP	Existing service with performance-based fleet need (high ridership or insufficient schedule)	6
	Will reach potential ridership generator	7
Implementation of service adjustment on existing locally funded service	Addresses performance-based fleet need (e.g. running-time adjustment)	8
	Will enhance regional transit connectivity (connect one or more routes)	9
	Will reach potential ridership generator	10
Implementation of new locally funded service	Will enhance regional transit connectivity (connect one or more routes)	11
	Will reach potential ridership generator	12

Note: If multiple adjustment requests have same rank, the Transit Propensity Tool is used. The service adjustment with highest Transit Propensity Index will receive priority.

510.1 Tie Break Methodology

If multiple service requests receive the same rank level in the same planning year, the transit propensity tool, which estimates boardings by revenue mile, is used as a tiebreaker. For additional information regarding the transit propensity tool, refer to the Section 240.9 above or Valley Metro's TSPM Phase II Final Report in **Appendix B**: TSPM Phase II Final Report for a detailed explanation of the methodology.

520 – Prioritization Process for Expansion Fleet

Service adjustments in the development years (4-5) of the SRTP that require expansion fleet are ranked using the prioritization process for expansion fleet, which evaluates the service adjustments and assigns points based on their funding characteristics, compliance with established TSPM standards, and regional connectivity. The more points a service earns, the higher it is prioritized in the list of fleet requests submitted to the Board for their consideration and possible recommendation to Maricopa Association of Governments (MAG). The prioritization process for expansion fleet is summarized in

Figure 14.

Figure 14: Prioritization Process for Expansion Fleet

PRIORITIZATION PROCESS FOR EXPANSION FLEET		
Category	**Metric**	**Points**
Funding Characteristics	Is there between 2 and 3 years of funding committed for the service improvement? OR Is there more than 3 years of funding committed for the service improvement?	**1** / **2**
	Is the service improvement a TLCP-planned service?	**1**
TSPM Compliance	Does the service improvement meet weekday service standards?	**0.5**
	Does the service improvement meet Saturday service standards?	**0.25**
	Does the service improvement meet Sunday service standards?	**0.25**
	Does the service improvement meet the current transit propensity threshold? (Note: only applicable to local/key local service improvements greater than 1 mile)	**1**
	Does the service improvement remove/modify an under-performing route deviation, thereby requiring at least one less vehicle for operation?	**1**
Regional Connectivity	Does the service improvement serve multiple jurisdictions?	**1**
	Does the service improvement connect to other transit route alignments?	**0.25 per connection (2 points maximum)**

520.1 Tie Break Methodology

In the event of a tie, each service improvement is further evaluated to determine its compliance with TSPM service and performance standards and to quantify its regional connectivity. The tie break methodology is summarized in

Figure *15* below.

Figure 15: Prioritization Process for Expansion Fleet Tie Break Methodology

PRIORITIZATION PROCESS FOR EXPANSION FLEET - TIEBREAK		
Category	**Metric**	**Points**
TSPM Compliance	Are weekend service standards met?	**1**
	If existing route, is weekday performance above the performance threshold for two or more performance measures?	**1**
Regional Connectivity	How many jurisdictions are served?	**1 Per Jurisdiction Served**

520.2 Regional and Local Tracks

Based on the outcome of the prioritization process for expansion fleet, proposed service improvements are placed on one of two tracks: a regionally-supported track and a local track. Services that rank favorably through the expansion fleet prioritization process fall into the regionally-supported track. Those services that rank less favorably but are still priorities for the submitting jurisdiction fall into the local track. If a jurisdiction still wishes to pursue implementation of services in the local track, they must support Valley Metro or the City of Phoenix Transit Department[13] throughout the entire fleet grant application process. Upon procurement, vehicles must be provided to Valley Metro or Phoenix if either agency will be operating the service. For efficient fleet management purposes, vehicles are then assigned at the operators' discretion.

520.3 Applicability

The prioritization process for expansion fleet is applied to all services in the development years of the SRTP requiring expansion fleet with two notable exceptions. The first exception is for programmed TLCP projects. As these improvements are programmed in the RTP, they are automatically given top priority. The second exception is for services that ranked well in the production years of the SRTP but the fleet requirements exceeded vehicle availability. In these cases, the service is given priority in the next development year, secondary only to TLCP projects. All other service improvements requiring expansion fleet in the development years will be prioritized using the expansion fleet prioritization process.

530 – Fleet Procurement and Programming Process

Regional transit fleet procurement and programming occur through a multi-agency integrated process that includes local jurisdictions, Valley Metro and MAG. The planned procurement and programming process is as follows: a request for service adjustment is made through the SRTP and fleet availability is determined. If fleet is unavailable for the service adjustment, Valley Metro identifies and submits a list of prioritized service adjustments approved by the Board to MAG for consideration in the federal funds programming process. The MAG Transit Committee discusses programming options for all federal funds. The MAG Transit Committee then recommends a Program of Projects and Five-Year

[13] The City of Phoenix purchases and owns their own vehicle fleet; including many vehicles that operate within other jurisdictions but which are Phoenix-operated routes.

Transportation Improvement Program (TIP) to Regional Council for approval. Once MAG approval is obtained, the City of Phoenix, with MAG concurrence, submits grants to the Federal Transit Administration for approval. The fleet is then procured by the appropriate agency.

Figure *16* illustrates the primary steps associated with the transit fleet procurement and programming process.

Figure 16: Fleet Procurement and Programming Process

600 – Transit Center and Park-and-Ride Classification

Transit centers and park-and-ride facilities are crucial features of a transit system that improve network access by facilitating transfers between routes and transportation modes. As part of this TSPM update, regional facilities were reviewed to identify similarities and differences between sites, with the goal of creating a more clear delineation of the operational and rider expectations at such facilities. Additionally, while Valley Metro's recently updated Light Rail Design Criteria Manual outlines construction codes and the recommended features of the system's built environment (landscaping, security, parking, etc.), it is specific to the design of the light rail system and does not explicitly define the features and placement of bus transit centers or park-and-rides. As such, it is the intent of this update to provide a classification structure for transit centers and park-and-rides in order to help integrate TSPM and the agency's current and future design criteria manuals. Given the nature of the different planning processes between light rail and bus facilities, this TSPM update effort focused strictly on bus facilities.

The classification process started with an understanding that the most fundamental difference between facilities are those that are publicly owned versus those that are shared with another facility, whether publicly or privately owned (i.e. library, recreation center, strip mall, Walmart, fast food chain,

etc.). Using MAG's Designing Transit Accessible Study (2013)[14] as a guide, the classification process then sought to incorporate the surrounding built environment into the framework because of its connection to the types of services provided. For example, there are fewer transit service types and routes on the suburban edge of the Valley, where population density is lower as compared to the urban core, which is served by numerous routes of several transit service types. The three built environment settings as established by MAG and incorporated in this classification matrix include urban core, outer urban, and suburban. **Table 11** outlines MAG's built environment definitions and extrapolated regional examples (the original study focused only on Phoenix).

Table 11: Built Environments around the Valley

From MAG Transit Accessible Communities Study			Extrapolated Examples	
	Definition	**Phoenix Example**	**Tempe Example**	**Mesa Example**
Urban Core	Within the heart of the city center; high employment and residential density	16th St/Thomas	Mill/University	Mesa/Center
Outer Urban	Between urban core and suburbs; medium employment and residential density	I17/Dunlap Ave	Southern/Rural	Southern/ Gilbert Rd.
Suburban	Beyond outer urban; low employment and residential density	75th Ave/Bell Rd	Elliot/Priest	Power/Brown

With these three features classified, a review of regional facilities was conducted and additional classification features were identified. The TSPM Working Group participated and provided input on the identified classification features, which were incorporated into the final classification matrix presented in **Figure 17**. The critical features include:

1. **Service Type** – Refers to the transit modes accessible at the location.
2. **Bike and Pedestrian Facilities** – Looks at the accessibility of the location via bicycle lanes and connected sidewalks. Bicycle parking at the facility is also considered. Fully accessible facilities have dedicated bicycle lanes, bicycle parking, and connected sidewalks. Limited accessibility means that either bicycle or pedestrian infrastructure is provided, but not both.
3. **Bus Stop Placement** – Considers how stops are positioned on or off the roadway for the boarding/alighting of passengers. Has safety and route speed implications.
4. **Freeway Proximity** – Refers specifically to commuter route services and the distance they travel from the freeway to a park-and-ride. Has route speed implications.

[14] https://www.phoenix.gov/streetssite/Documents/MAG_Designing-Transit-Accessible-CommunitiesStudy-Final-Report.pdf

5. **Deviation from Route** – Refers primarily to local routes and the distance they deviate from their alignment to access a transit center or park-and-ride. Has network connectivity and route speed implications.
6. **Central Business District (CBD) Direction of Travel Placement** – Considers the placement of the stop to locate in the direction of travel and on the far side of an intersection. Has route speed and operational implications.
7. **HOV Access** – Consideration of facility location given route accessibility to a HOV entry/exit ramp.
8. **Local Bus Level of Service (LOS)** – Refers to the minimum frequencies of routes serving the facility.
9. **Commuter Bus LOS** – Refers to the minimum number of daily AM and PM peak trips serving the facility.
10. **Number of Transit Connections** – Considers the types of services and number of transfer that are available at the facility.
11. **Kiss-and-Ride** – Refers to park-and-ride facilities having a designated area for quick pedestrian pick-up and drop-off that does not conflict with bus operations or obstruct the flow of vehicular traffic.
12. **Ticket Vending Machines (TVMs)** – This considers the availability of ticket vending machines in station areas to help expedite the boarding process. This has implications for customer experience and route speed.

Note that all newly constructed facilities are expected to meet ADA requirements. Examples of other facility features that should be considered and which are elaborated on in the design criteria manual include:

- Safety and security (CCTV cameras, emergency call boxes)
- Shade (via landscaping or structures)
- Operator facilities (i.e. restrooms)
- Real time information
- Lighting
- Amenities such as benches, trash receptacles, water fountains, etc.

To optimize the placement of transit centers and park-and-rides in the regional transit network, it is encouraged that member agencies involve Valley Metro as early in the planning process as possible. It is recommended that member agencies wanting to implement a transit center or park-and-ride include that information during the annual SRTP update process.

Figure 17: Transit Center and Park-and-Ride Classification Matrix

	PUBLICLY OWNED				SHARED-USE FACILITY			
	Urban Core	Outer Urban		Suburban	Urban Core	Outer Urban		Suburban
	TC	TC/P	P	P	TC	TC/P	P	P
Service Type	Commuter Express / Local Bus	Local Bus	Commuter Express	Commuter Express / Local Bus	Commuter Express / Local Bus	Local Bus	Commuter Express	Commuter Express / Local Bus
Bike/Ped Facilities	Fully Accessible	Fully Accessible	Limited Access	Limited Access	Fully Accessible	Fully Accessible	Limited Access	Limited Access
Bus Stop Placement	Off-street docking; serves as end of line (Express); designated bus entry	Off-street docking; designated bus entry	Off-street docking; designated bus entry	Off-street docking; serves as end of line (Express); designated bus entry	Off-street docking; serves as end of line (Express); shared bus/auto entry	On-street docking	Off-street docking	On-street docking; serves as end of line (Express)
Freeway Proximity	NA	NA	<0.5 Miles	<1 Mile	NA	NA	<0.5 Miles	<1.5 Miles
Deviation from Route	On alignment	On alignment	0.5 miles or less	0.5 miles or less	On alignment	On alignment	0.5 miles or less	0.5 miles or less
CBD Direction of Travel Placement (far side)	✓	✓	✓	✓	✓	✓		
HOV Access Preferred			✓	✓			✓	✓
Local Bus LOS	10-30 minutes	30 minutes or better	30-60 minutes	30-60 minutes	10-30 minutes	30 minutes or better	30-60 minutes	30-60 minutes
Commuter Express LOS (Peak Trips)	6+ AM Trips 6+ PM Trips	4+ AM Trips 4+ PM Trips	4+ AM Trips 4+ PM Trips	4+ AM Trips 4+ PM Trips	6+ AM Trips 6+ PM Trips	4+ AM Trips 4+ PM Trips	4+ AM Trips 4+ PM Trips	4+ AM Trips 4+ PM Trips
Number of Transit Connections	5+; serves light rail and / or express	3+; serves light rail and / or express	3+	2+	5+; serves light rail and / or express	3+; serves light rail and / or express	3+	2+
Ticket Vending Machines	✓	✓	✓	✓	✓			
Kiss & Ride	✓	✓	✓	✓	✓			

TC Transit Center

TC/P Transit Center with Park-and-Ride

P Park-and-Ride

700 – Mobility Enhancement Uses

From the sharing economy to autonomous vehicles, technology and new service delivery models are changing the transportation industry. Bike-share, e-scooters, and on-demand transportation network companies (TNCs) such as Uber and Lyft are just some examples of expanding modes and service delivery models that enhance mobility. Often owned and operated by private companies, when coordinated appropriately with a transit agency, the technologies and services can play a vital role in supporting public transit networks. Referred to here as **mobility enhancement uses** (MEUs), the term involves a transit authority coordinating outside of transit service delivery models to improve network connectivity and improve travel options, such as employing Transportation Network Companies (TNCs), working with micromobility, car shares, carpools and vanpools.

Around the Valley, jurisdictions are experiencing an on surge of services, particularly bike shares and e-scooters, and many areas are partnering with TNCs and/or piloting new vehicle technologies as well. The purpose of integrating these MEU efforts into TSPM is to help improve coordination with the public transit network and improve knowledge sharing between member agencies. As part of this process, VM Capital and Service Development (CSD) staff will work with key staff from member agencies to create a database of MEUs (mobility offered, company name, contact information). Key staff from member agencies will assist by:

- Enabling data sharing
- Providing up to date transit planning documents
- Reporting mobility goals and objectives of current partnerships
- Presenting to the SPWG to learn more on MEUs

Staff will help coordinate regional grant support, if applicable and report annually, at a minimum, on MEUs in the region, recent partnerships, and lessons learned.

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Appendix A: TSPM Phase I Final Report

Appendix B: TSPM Phase II Final Report

Appendix C: TSPM Phase III Final Report

Appendix D: Local Service Planning Support Request Form

Appendix E: Transit Propensity Tool Methodology Update Memo

Appendix F: Frequency Assessment Standards for Transit Final Report