

# City of Phoenix Public Transit Department Title VI Program

November 2015





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## Section 1: Introduction

### **City of Phoenix History**

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

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

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

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



*Horse-drawn streetcars pass by the old City of Phoenix Courthouse in the late 1890's.*

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

### **Phoenix Is Born**

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

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

President William Howard Taft approved Arizona's statehood on February 14, 1912. On March 18 of the same year, Governor George Hunt called the first State Legislature into session. This was an auspicious step in the state's history, and in the following year, the City of Phoenix took an equally important one. At a special election on October 11, 1913, the people of Phoenix, by a vote of nearly



*More than 100 years before modern light rail, streetcar tracks line the roadway on Washington Street.*



## Section 1: Introduction

two to one, ratified a new charter. The charter gave Phoenix the council-manager form of government. Thus, Phoenix became one of the first cities in the nation to adopt this progressive form of government.

### ***Growing into a Metropolis***

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

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

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

### ***City of Phoenix Public Transit Department***

The Phoenix Public Transit Department is a mem-

ber of the 16 agency regional transit system under the system name of Valley Metro.

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

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

With an annual operating budget of \$260 million and with an administrative staff of 115 positions, the Phoenix Public Transit Department oversees and monitors operations of three private companies that provide transit service to the city of



*The Route 10 serves the current City of Phoenix Courthouse on Jefferson Street.*

***City of Phoenix Public Transit  
Department Mission***

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

***City of Phoenix Public Transit  
Department Vision***

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

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

The city of Phoenix manages transit services to include 44 local bus routes, five RAPID commuter routes, five neighborhood and downtown circulators and alternative transportation for people with disabilities and senior citizens. With a transportation fleet of 685 buses covering 20 million miles of service within the city of Phoenix, the department provides more than 70 percent of the region's transit. Valley Metro operates the majority of the remaining transit service on behalf of Valley Metro member cities.

The Phoenix Public Transit Department also takes a leading role in the development and oversight of the region's 20-mile light rail line. Working with Valley Metro and other Valley Metro agency partners, Phoenix helps to deliver seamless regional transit services under the name Valley Metro.

The city of Phoenix funds much of its transit service through Transit 2000 - a local sales tax approved by Phoenix voters, a portion of a regional sales tax known as Proposition 400, and other federal, state and local sources.

***City of Phoenix Public Transit Department  
Title VI Program***

Title VI activities are mandated by the federal government to ensure that people of all races, income levels, ages, and abilities have an equal voice in the

planning and project delivery processes and receive equal benefit from the results of such planning. The City of Phoenix Public Transit Department is actively engaged in Title VI activities as the primary recipient of federal funding.

In partnership with Valley Metro, the City of Phoenix Public Transit Department has developed a robust Title VI program, the goal of which is to ensure all people have a meaningful role in processes associated with the delivery of the region's transit services. This program outlines the roles, method of administration, and analysis that supports equity in the Department's transportation services, planning and programs.

The City of Phoenix Public Transit Department operates under the premise that it is an imperative that it develop transit services that are responsive to the needs and priorities of the city's diverse population. In order to execute this mandate, it is essential to have a process in place that effectively engages the public, fully integrates their feedback, analyzes the benefits and burdens of various alternatives, and recommends the most equitable solutions. With an intentional focus, vulnerable populations are assured equal access to the City of Phoenix Public Transit Department's planning process and to the products of such planning.

The City of Phoenix Public Transit Department, working in tandem with Valley Metro, continues to reach out to people in all corners of the city to ensure processes in the department reflect the voices and visions of our diverse population. In order to facilitate a thorough understanding of these activities, the definitions are provided in Attachment A.

The City of Phoenix Public Transit Department's plan will be reviewed annually and updated as needed. The Title VI program will be developed no less than every three years in accordance with federal regulation. Federal guidance directing the content of the City of Phoenix Public Transit Department's Title VI program is described in the following section.



## Section 2: Overview of Roles

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#### ***Guidance for Recipients of Federal Funding***

Title VI of the Civil Rights Act of 1964 is the overarching civil rights law that prohibits discrimination based on race, color, or national origin, in any program, service or activity that receives federal assistance. Specifically, Title VI assures that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.”

Title VI has been broadened and supplemented by related statutes, regulations and executive orders. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 prohibited unfair and inequitable treatment of persons as a result of projects that are undertaken with Federal financial assistance. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal-aid recipients and contractors whether those programs and activities are federally funded or not.

In addition to statutory authorities, Executive Order 12898, signed in February of 1994, requires federal agencies to identify certain disproportionately high and adverse effects of its programs, policies, and activities on minority populations and low-income populations. Such issues are addressed by involving the potentially affected public in the development of transportation projects and transit service that fit within their communities without sacrificing safety or mobility. In 1997, the U.S. Department of Transportation (USDOT) issued a corresponding DOT order to summarize and expand upon the requirements of Executive Order 12898. Also, Executive Order 13166 provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. Finally, as the primary recipient of funding from the Federal Transit Administration (FTA), the City of Phoenix Public Transit Department follows the guidance of FTA Circular 4702.1B, which provides the instructions necessary to carry out the USDOT Title VI regulations, and to integrate into our pro-

grams and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

As a recipient of federal financial assistance, the City of Phoenix Public Transit Department must provide access to individuals with limited ability to speak, write, or understand the English language. The City of Phoenix Public Transit Department will not restrict an individual in any way from the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under its programs or projects. Individuals



may not be subjected to criteria or methods of administration which cause adverse impact because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program because of race, color or national origin. Therefore, based on federal guidance for large transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area of 200,000 or more in population, the main components of the City of Phoenix Public Transit Department Title VI Program include:

### Title VI Requirements

- A signed Title VI assurance and governing body approval of the overall Title VI Program.
- A copy of the agency's public notice with a list of where the notice is posted.
- Instructions for how to file a complaint with a copy of the complaint form.
- A list of any Title VI investigations, complaints or lawsuits and how such complaints were addressed and resolved by the City of Phoenix Public Transit Department.
- A Public Participation Plan and list of outreach activities conducted since the last submission.
- A Language Assistance Plan for providing language assistance.
- A table depicting the racial composition of transportation-related committees, boards, and advisory councils.
- Title VI analysis conducted for applicable facilities.
- System-wide standards and policies.
- Demographic and service profile maps and charts.
- Fare and Service Equity Policy.
- Origin and Destination data to include customer travel patterns and demographic makeup.
- Service Monitoring Program.
- Description of how the primary recipient of FTA funding monitors for compliance.

The City of Phoenix Public Transit Department shall also ensure that its sub-recipients adhere to



state and federal law and include in all written agreements or contracts, assurances that the sub-recipient must comply with Title VI and other related statutes. The City of Phoenix Public Transit Department, as a primary recipient that distributes federal transportation funds, shall monitor its sub-recipients for voluntary compliance with Title VI. In the event that non-compliance is discovered, the City of Phoenix Public Transit Department will make a good faith effort to ensure that the sub-recipient corrects any deficiencies arising out of complaints related to Title VI and that sub-recipients will proactively gauge the impacts of any program or activity on the traditionally underserved population that includes minority populations and low-income populations, persons with disabilities, persons with Limited English Proficiency (LEP), all interested persons and affected Title VI populations.

The City of Phoenix Public Transit Department's efforts to prevent such discrimination must address, but not be limited to, a program's impacts, access, benefits, participation, treatment, services, contracting opportunities, training, investigation of complaints, allocation of funds, prioritization of projects, and the overarching functions of planning, project development and delivery, right-of-way, construction, and research.

The City of Phoenix Public Transit Department has developed this Title VI Plan to ensure that services, programs, and activities of the Department are offered, conducted, and administered fairly, without regard to race, color, national origin of the participants or beneficiaries of federally funded programs, services, or activities.

## Section 2: Overview of Roles



**City of Phoenix**  
PUBLIC TRANSIT DEPARTMENT

### Title VI Policy Statement

The following policy statement supports the implementation of these activities:

The City of Phoenix Public Transit Department is committed to ensuring that no person is discriminated against on the grounds of color, race, or national origin as provided by Title VI of the Civil Rights Act of 1964 and related legislation. Specifically, Title VI asserts that, “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

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

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Maria Hyatt

Director

City of Phoenix Public Transit Department

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Date



## Section 3: Method of Administration

### Section 3: Method of Administration

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

#### **Language Assistance Needs Assessment – Four Factor Analysis**

The following outlines how to identify a person who may require language assistance, the ways in which the City of Phoenix Public Transit Department and the regional transit authority, Valley Metro, provides such assistance, any staff training that may be required to provide such services, and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis. The four factors are:

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

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

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

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

The following is an explanation of what is to be included in the four factor LEP population needs assessment. In addition to the following explanation, Valley Metro has conducted a thorough LEP four factor analysis and resulting Language Access Plan to be utilized by all Valley Metro member agencies. Please refer to *Attachment L: Valley Metro Limited English Proficiency Four Factor Analysis and Language Access Plan*.

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

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



## Section 3: Method of Administration

### *Demographic Profiles for Communities of Concern*

Communities of concern describe populations that have been determined by the federal government as benefiting from protections to ensure their meaningful involvement in planning and services. These vulnerable populations have been identified through the Civil Rights Act of 1964, Executive Order 12898, and Executive Order 13166 to end discrimination and ensure equal access to all federally funded services.

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

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

*Limited English Proficient (LEP) households:* A person with limited English proficiency is described as a person who does not speak English as a primary language and has a limited ability to read, write, speak and understand English. An area is identified as LEP when five percent or more of the population, or 1,000 people within a neighborhood, fit this

definition. The Census Bureau further defines households as linguistically isolated when there are no members aged 14 years and over who speak only English or who speak a non-English language and speak English “very well.” In other words, all members of the household ages 14 years and over have at least some difficulty with English.

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

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

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

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





## Section 3: Method of Administration

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

### ***The City of Phoenix Public Transit Department Public Involvement Process***

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

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





### Section 3: Method of Administration

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

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

The CTC is a citizen-led transportation committee that consists of five members appointed by the Phoenix City Council, one from each of the city’s council districts.

Among the CTC’s fundamental responsibilities is the review and approval of the City of Phoenix Public Transit Department Transportation Improvement Program (TIP) and the Transportation 2050 long range transit plan. The TIP contains all projects planned by the City of Phoenix Public Transit Department during the upcoming five years, and Transportation 2050 establishes a framework for the future transit needs of City of Phoenix residents, outlining a 35-year vision for the planning and construction of transit facilities within the city of Phoenix.

Another important function of the CTC is to assist in developing and maintaining public understanding and support of the City of Phoenix Public Transit Department programs through active communication. CTC members bring the constituent voice to the City of Phoenix Public Transit Department transportation decisions. The board meets every month, and city of Phoenix residents are encouraged to attend.

**The City of Phoenix Mayor and City Council:** The City is administered by a City Manager who reports to the Mayor and five City Council members elected by the public. The Mayor and City Council receives final drafts of key policies, procedures, plans and programs for adoption.



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

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

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

Resources to translate materials and interpret for individuals are available but finite. The investment is made to translate vital materials, and the City of Phoenix Public Transit Department maintains a standing offer to translate other materials into additional languages and provide alternative formats such as Braille or large print. The City of Phoenix Public Transit Department utilizes the City of Phoenix Library Braille equipment to aid in the provision of these services and frequently enlists internal resources and staff who are bilingual and available to assist with language interpretation. At a minimum, there is a bilingual staff member who can assist with interpretation at public meetings as needed.

**Table Depicting Membership of Transit- Related Committees Broken Down By Race**

Body	Caucasian	Latino	African American	Asian American	Native American	Non-Disclosed
<b>Citizen’s Transit Committee</b>	7	0	3	0	0	2
<b>Population</b>	58%	0	25%	0	0	17%

## Section 3: Method of Administration

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

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

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

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

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

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



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

- Identifying the LEP individuals who need Language Assistance



## Section 3: Method of Administration

- Implementing Valley Metro's language assistance measures
- Providing staff training
- Ongoing implementation of public involvement program and activities
- Monitoring and updating the LAP

### *Identifying the LEP Individuals Who Need Language Assistance:*

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

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

### *Language Assistance Measures:*

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

- Continue to provide for interpreters as needed, in Spanish and any other language requested in accordance with Title VI guidelines.

- Maintain regular communication with front line public involvement staff regarding their experience with the LEP clients in order to assess the assistance provided.
- Continue to translate important notices and major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population.
- Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

### *Staff Training:*

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

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





### Section 3: Method of Administration

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

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

#### *Public Involvement:*

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

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

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

In collaboration with Valley Metro, The City of Phoenix Public Transit Department's Title VI Coordinator will continue to explore new and innovative techniques and strategies to engage the public in transportation projects and planning.

#### *Monitoring and Updating the LAP:*

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

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

#### *Notice to LEP Persons:*

Any person requesting language assistance should contact:

Kristy Ruiz  
Title VI /ADA Coordinator  
City of Phoenix Public Transit Department  
302 N. 1st Ave., Ste. 900  
Phoenix, AZ 85003  
(602) 495-0579 (phone)  
(602) 495-2002 (fax)  
kristy.ruiz@phoenix.gov  
[www.phoenix.gov/publictransit/title-vi-notice](http://www.phoenix.gov/publictransit/title-vi-notice)



## Section 4: Conclusion, Definitions and Background

### Section 4: Conclusion and Definitions

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

For more information, please contact the Title VI Coordinator at (602) 495-0579. Thank you for your support of the City of Phoenix Public Transit Department's efforts throughout the Metropolitan Phoenix area.

#### **Definitions**

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

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

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

gional system that operates throughout the Valley.

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

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

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

*Communities of Concern:* Federal legislation has identified vulnerable populations that receive protection to end discrimination and ensure equal access to all federally funded services. This includes the Civil Rights Act of 1964, Executive Order 12898,

## Section 4: Conclusion, Definitions and Background

and Executive Order 13166. These mandated populations include minorities, people with low incomes, people with Limited English Proficiency (LEP), and people with disabilities.

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

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





## TITLE VI NOTICE TO THE PUBLIC AND ADA POLICY STATEMENT

The City of Phoenix Public Transit Department hereby gives notice that it is the agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, Title II of The Americans with Disabilities Act and related statutes and regulations in all programs and activities. These federal statutes require that no person shall, on the grounds of race, color, national origin or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, activity or service the City of Phoenix Public Transit Department administers.

For more information regarding The City of Phoenix Public Transit Department's Title VI obligations, please contact:

Kristy Ruiz  
Title VI Coordinator  
City of Phoenix Public Transit Department  
(602) 495-0579  
Via e-mail at [kristy.ruiz@phoenix.gov](mailto:kristy.ruiz@phoenix.gov)

**Any person who believes his/her rights have been violated may file a complaint to:**

Valley Metro Customer Service  
(602) 253-5000  
TTY: 602.251.2039  
[ValleyMetro.org](http://ValleyMetro.org)  
Via e-mail at [csr@valleymetro.org](mailto:csr@valleymetro.org)

Or by mailing the complaint to Valley Metro Customer Service, 4600 E. Washington Street, Suite 101, Phoenix, AZ 85034

## AVISO AL PÚBLICO DE TÍTULO VI Y DECLARACIÓN DE POLÍTICA ADA'

El Departamento de Transporte Público de la Municipalidad de Phoenix por la presente da aviso al público que es la política de la agencia asegurar el pleno cumplimiento con el Título VI de la Ley de Derechos Civiles de 1964, el Título II de la Ley para Americanos Minusválidos y reglamentos y estatutos relaciones en todos sus programas y actividades. Estos estatutos federales requieren que no se excluya a ninguna persona de participar en, ni que se le nieguen los beneficios de, o que de alguna otra manera sean sujetos a discriminación en cualquier programa, actividad o servicio administrado por el Departamento de Transporte Público de la Municipalidad de Phoenix, con base en su raza, color, origen nacional o discapacidad.

Para más información sobre las obligaciones del Título VI del Departamento de Transporte Público de la Municipalidad de Phoenix, por favor comuníquese con:

Kristy Ruiz  
Title VI Coordinator  
City of Phoenix Public Transit Department  
(602) 495-0579  
Por correo electrónico a [kristy.ruiz@phoenix.gov](mailto:kristy.ruiz@phoenix.gov)

**Cualquier persona que considere que se han violado sus derechos puede presentar una queja dirigida a:**

Valley Metro Customer Service  
(602) 253-5000  
TTY: 602.251.2039  
[ValleyMetro.org](http://ValleyMetro.org)  
Por correo electrónico a [csr@valleymetro.org](mailto:csr@valleymetro.org)

O puede enviar la queja por correo postal dirigido a: Valley Metro Customer Service, 4600 E. Washington Street, Suite 101, Phoenix, AZ 85034

The City of Phoenix Public Transit Department Title VI Notice to the Public and ADA Policy Statement. These notices are posted throughout the Department's offices and at all city Transit Centers.



**TITLE VI COMPLAINT PROCEDURE**

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by Valley Metro or our transit service provider may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form or by calling Valley Metro's Customer Service. All complaints are logged into Valley Metro's Customer Assistance System (CAS) and will be investigated according to federal standards.

Valley Metro's Title VI Complaint Form is located on our website: ([http://www.valleymetro.org/about\\_valleymetro/civil\\_rights\\_policy\\_statement](http://www.valleymetro.org/about_valleymetro/civil_rights_policy_statement)). The form is available in both English and Spanish. Complaints can also be filed by contacting Valley Metro's Customer Service at:

Email: [csr@valleymetro.org](mailto:csr@valleymetro.org)  
Phone: (602) 253-5000  
TTY: (602) 251-2039

Valley Metro has 30 days to investigate each complaint. If more information is needed to resolve the case, Valley Metro may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to Valley Metro Customer Service.

# Section 5: Attachment C - Valley Metro Complaint Form - English

## TITLE VI COMPLAINT FORM

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

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

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

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

\_\_\_\_\_  
Signature Date

602.253.5000  
TTY: 602.251.2039  
[valleymetro.org](http://valleymetro.org)



RPT2143



### FORMA DE QUEJAS DEL TITULO VI

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

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

#### Sección I: Información del Cliente

Nombre:		
Domicilio:		
Ciudad:	Estado:	Código Postal:
Teléfono del Trabajo:	Teléfono del Hogar:	Teléfono Celular:
Domicilio Electrónico:		

#### Sección II: Información del Incidente

Fecha del Incidente:	Hora del Incidente:	AM/PM	Ciudad:
Ubicación del Incidente:		Dirección de Viaje:	
# de Ruta:	# de Autobús/Tren Ligero:		

Tipo de Servicio:    Local    LINK    Express/RAPID    Tren Ligero    Circulador/Connector    Dial-a-Ride

Nombre del/la Conductor/a:

Descripción del/la Conductor/a:

¿En qué se basó la discriminación? (Marque todo lo que sea aplicable)

Raza    Color    Origen Nacional    Dominio Limitado del Inglés    Otro:

Explique tan claramente como sea posible lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron a usted (si los sabe), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use el reverso de esta forma.

¿Ha usted registrado esta queja con la Administración Federal de Tránsito?    Sí    No

Si contestó sí, por favor provea información sobre la persona de contacto en la Administración Federal de Tránsito donde se registró la queja:

Nombre:	Título:
Domicilio:	Teléfono:

¿Ha usted registrado previamente una queja del Título VI con esta agencia?:    Sí    No

Usted puede adjuntar cualquier material por escrito o cualquier otra información que crea que sea relevante a su queja.

Se requieren la firma y la fecha abajo:

\_\_\_\_\_ Firma    Fecha

valleymetro.org  
602.253.5000  
TTY: 602.251.2039



RPT243

## Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

### List of Investigations Title VI Investigations, Complaints and Lawsuits — November 2012-June 2015

The City of Phoenix Public Transit Department did not receive any legal claims of Title VI discrimination during the period of November 2012-June 2015.

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
187734	11/2/2012	Discrimination	Attitude (operator)	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
189635	11/30/2012	Discrimination	Hazardous Operation	Video was reviewed and no evidence of hazardous operation or discrimination could be found. No action could be taken.
189694	12/1/2012	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
190467	12/11/2012	Discrimination	Attitude (operator)	Operations manager addressed issue with operator per company policy.
191131	12/20/2012	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
191196	12/21/2012	Discrimination	Policy (oper)	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
191550	12/29/2012	Discrimination	Policy (oper)	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
191863	1/4/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
193538	1/29/2013	Discrimination	Pass Up	Video was reviewed and no evidence of discrimination could be found. No action could be taken.

Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
194522	2/7/2013	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
194680	2/9/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
194777	2/11/2013	Discrimination	Fare Policy	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
194975	2/11/2013	Discrimination	Hazardous Operation	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
195056	2/13/2013	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
195555	2/19/2013	Discrimination	Attitude (operator)	Video was reviewed and operator on bus scheduled at time customer provided does not fit customer description. Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
195648	2/20/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action was taken.
195985	2/25/2013	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Customer's state they were not at the bus stop. No action was taken.
197017	3/6/2013	Discrimination	Pass Up	Video was reviewed for possible policy violations; with no conclusive evidence of discrimination found. No customers were on the bus or at the stop at the time given by customer. No action could be taken.
198950	3/27/2013	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
200124	4/10/2013	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.



Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints—  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
201597	4/29/2013	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue was addressed with operator per company policy.
202119	5/4/2013	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue regarding layover policy was addressed with operator per company policy.
202306	5/7/2013	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. No action was taken.
203183	5/16/2013	Discrimination	Pass Up	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
203252	5/17/2013	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. No action was taken.
203283	5/17/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action was taken.
203286	5/17/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator to be monitored.
203513	5/20/2013	Discrimination	Attitude (operator)	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
203879	5/24/2013	Discrimination	Forced off/Security	Complaint forwarded to supervisor to be addressed with operator per company policy.
204153	5/29/2013	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Operator states that he does not recall anyone running for his bus. Per customer statement they were not at bus stop. No action was taken.
204648	6/4/2013	Discrimination	Pass Up	Complaint forwarded to supervisor to be addressed with operator per company policy.

Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
205705	6/15/2013	Discrimination	Attitude (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
205780	6/17/2013	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Operator followed fare policy. No action was taken.
206286	6/22/2013	Discrimination	Pass Up	Video was reviewed and no evidence of discrimination could be found. Per video, no stops were passed that had customers waiting. No action could be taken.
206682	6/27/2013	Discrimination	Policy (oper)	No evidence of discrimination could be determined based on investigation. Operator states that he asks all customers to dispose of drinks in non-approved containers. No action was taken.
206747	6/28/2013	Discrimination	Pass Up	Operator to be monitored.
207255	7/5/2013	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. Per video, customer has random verbal outbursts. No action could be taken.
207336	7/8/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy.
208405	7/22/2013	Discrimination	Attitude (operator)	Operations manager addressed issue with operator per company policy.
209150	7/29/2013	Discrimination	Forced off/Security	Operator to be monitored.
211188	8/19/2013	Discrimination	Attitude (operator)	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
211469	8/21/2013	Discrimination	Fare Policy	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
211629	8/22/2013	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. No action could be taken.

Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints—  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
211792	8/24/2013	Discrimination	Policy (oper)	Issue addressed with operator per company policy.
212209	8/28/2013	Discrimination	Fare Policy	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
213047	9/6/2013	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
213682	9/13/2013	Discrimination	Attitude (operator)	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
214428	9/21/2013	Discrimination	Attitude (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.
215064	9/28/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy.
215558	10/4/2013	Discrimination	Hazardous Operation	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
216437	10/15/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy.
216553	10/16/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy. Operator to be monitored.
216720	10/18/2013	Discrimination	Hazardous Operation	Issue addressed with operator per company policy.
217250	10/23/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy.
217374	10/26/2013	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
218337	11/7/2013	Discrimination	Policy (operator)	Issue addressed with operator per company policy.



Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
218510	11/9/2013	Discrimination	Attitude (operator)	Issue addressed with operator per company policy. Operator to be monitored.
219108	11/18/2013	Discrimination	Fare Policy	Issue addressed with operator per company policy.
219190	11/19/2013	Discrimination	Pass Up	Issue addressed with operator per company policy.
219668	11/25/2013	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
221607	12/19/2013	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator was following fare policy. No action was taken.
222078	12/30/2013	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Customer states they were not at the bus stop. No action was taken.
222538	1/7/2014	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
223970	1/24/2014	Discrimination	Pass Up	Issue addressed with operator per company policy.
224344	1/29/2014	Discrimination	Attitude (operator)	Issue addressed with operator per company policy.
225364	2/7/2014	Discrimination	Fare Policy	Video was requested, however there was no recording available for the date and time of the reported incident. Therefore, there was insufficient evidence to determine if discrimination took place. No action could be taken.
225511	2/10/2014	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
226595	2/23/2014	Discrimination	Fare Policy	Video was requested, however there was no recording available for the date and time of the reported incident. Therefore, there was insufficient evidence to determine if discrimination took place. No action could be taken.

Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
226844	2/26/2014	Discrimination	Attitude (operator)	Video was requested, however there was no recording available for the date and time of the reported incident. Therefore, there was insufficient evidence to determine if discrimination took place. No action could be taken.
228482	4/21/2014	Discrimination	Attitude (operator)	Video was requested, however there was no recording available for the date and time of the reported incident. Therefore, there was insufficient evidence to determine if discrimination took place. No action could be taken.
228336	3/15/2014	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Operator was following fare policy. Issue addressed with operator per company policy.
229104	3/25/2014	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
229149	3/25/2014	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
230274	4/8/2014	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
231181	4/19/2014	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. Customer did not have reduced fare ID. No action could be taken.
231433	4/23/2014	Discrimination	Attitude (operator)	Video was reviewed and evidence was found to validate customer's allegations. Issue addressed with operator per company policy.
232522	5/7/2014	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. Customer did not walk to the bus. No action could be taken.
232987	5/13/2014	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
233128	5/15/2014	Discrimination	Policy (operator)	Operations manager addressed issue with operator per company policy.

Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
235819	6/19/2014	Discrimination	Pass Up	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
236591	6/30/2014	Discrimination	Pass Up	Operations manager addressed issue with operator per company policy.
236763	7/2/2014	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
236910	7/3/2014	Discrimination	Forced off/Security	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
237010	7/6/2014	Discrimination	Policy (operator)	Video was reviewed and no evidence of discrimination could be found. No action could be taken.
238746	7/30/2014	Discrimination	Attitude (operator)	Video was reviewed and no evidence of discrimination could be found. Customer refused to show ID for reduced fare. No action could be taken.
239874	8/12/2014	Discrimination	Policy (operator)	Operations manager addressed issue with operator per company policy.
240861	8/23/2014	Discrimination	Forced off/Security	Video was reviewed and evidence was found to validate customer's allegations. Issue addressed with operator per company policy.
242189	9/8/2014	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
242799	9/14/2014	Discrimination	Attitude (operator)	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
245529	10/14/2014	Discrimination	Hazardous Operation	Video was reviewed and evidence was found to validate customer's allegations. Issue addressed with operator per company policy.
246876	10/28/2014	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
249683	11/25/2014	Discrimination	Attitude (operator)	Complaint forwarded to supervisor to be addressed with operator per company policy.



Section 5: Attachment D - List of Title VI Investigations, Complaints and Lawsuits

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
251319	12/15/2014	Discrimination	Forced off/Security	Complaint forwarded to supervisor to be addressed with operator per company policy. Operator to be monitored.
251351	12/15/2014	Discrimination	Pass Up	Per information provided by customer and investigation conducted, correct operator could not be identified. No action could be taken.
252495	1/2/2015	Discrimination	Pass Up	Video was viewed and no evidence of discrimination could be determined based on investigation. No action to be taken.
252535	1/3/2015	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. Customer did not produce reduced fare ID. No action could be taken.
252537	1/3/2015	Discrimination	Fare Policy	Video was reviewed and no evidence of discrimination could be found. Customer did not produce reduced fare ID. Kudos sent in from another customer regarding the incident, stating the operator was following procedure.
252538	1/3/2015	Discrimination	Pass Up	Not investigated. Addressed with provider.
252539	1/3/2015	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
254151	1/23/2015	Discrimination	Policy (operator)	No evidence of discrimination could be determined based on investigation. Operations manager addressed issue with operator per company policy.
256403	2/15/2015	Discrimination	Attitude (operator)	Video was viewed and no evidence of discrimination could be determined based on investigation. Operator to be monitored.
257230	2/24/2015	Discrimination	Attitude (operator)	Video was reviewed and no evidence was found to validate customer's allegations. Complaint forwarded to supervisor to be addressed with operator per company policy.
257757	3/1/2015	Discrimination	Pass Up	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.

City of Phoenix Public Transit Department Title VI Complaints —  
November 2012-June 2015, Continued

City of Phoenix Public Transit Title VI Complaints— For Routes Operated by the City of Phoenix November 2012-June 2015				
Complaint Number	Incident Date	Subcategory	Customer Complaint	Action Taken
258586	3/10/2015	Discrimination	Fare Policy	Video was viewed and no evidence of discrimination could be determined based on investigation. Operator following company policy. No action to be taken.
261165	4/7/2015	Discrimination	Forced off/Security	Video was viewed and no evidence of discrimination could be determined based on investigation. No action to be taken.
261604	4/13/2015	Discrimination	Fare Policy	Video was viewed and no evidence of discrimination could be determined based on investigation. Operator following company policy. No action to be taken.
261792	4/14/2015	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Issue addressed with operator per company policy.
263514	5/4/2015	Discrimination	Fare Policy	No evidence of discrimination could be determined based on investigation. Operator found to be following company policy. No action to be taken.

## Section 5: Attachment E - Title VI Facilities Equity Analysis

### Title VI Facilities Equity Analysis

The City of Phoenix Public Transit Department did not construct any facilities that required a Title VI Facilities Equity Analysis, per federal guidance according to FTA Circular 4702.1B, Chapter III, Section 13 — *Determination of Site or Location of Facilities*.



DRAFT

# City of Phoenix

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## Title VI Service Monitoring Report

April 2015



**City of Phoenix**  
PUBLIC TRANSIT DEPARTMENT

### **Introduction**

The purpose of this document is to report the results of the City of Phoenix Public Transit Department Title VI Service Monitoring Program. This program was undertaken in April 2015 to identify disparities in the level and quality of City of Phoenix Public Transit Department operated transit service provided to different demographic groups, in particular minority populations. This report also reviews the siting of transit amenities provided to different demographic groups in the City of Phoenix.

Title VI of the Civil Rights Acts of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Federal Transit Administration (FTA) Title VI guidelines require the City of Phoenix to conduct service monitoring at least once every three years to compare the level and quality of service provided to predominantly minority areas with service provided in other areas. This purpose of this evaluation is to ensure that service and policy changes result in equitable service.

This report will be used to evaluate bus services and the siting of transit amenities in an objective manner to identify the potential for adverse, disproportionately high, or disparate impacts to minority populations. Per FTA requirements, this report will be utilized to provide suggested corrective actions for consideration, awareness and approval by the City of Phoenix Public Transit Department Director and the City of Phoenix Council.

### **Guidelines**

The City of Phoenix Title VI Service Monitoring Program is guided by FTA Circular 4702.1B, Chapters 4-9, the FTA Triennial Review Workshop Workbook, FY2015, Section 5 - Title VI, the Valley Metro Regional Transit Standards and Performance Measures Phase I Report, the City of Phoenix 2012 Title VI Program, the 2013 Valley Metro Title VI Procedures Manual, and the City of Phoenix Title VI Policy Major Service Change Service Equity Evaluation Procedures Manual.

The following information and documentation is presented as per FTA Triennial Review Workshop Workbook, FY2015, Section 5 - Title VI, Question 22 under the Explanation section:

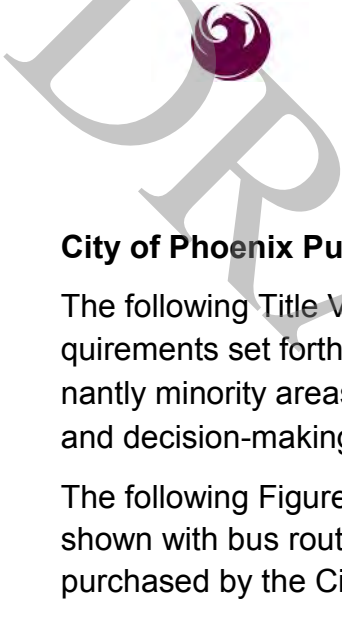
*Prior to October 1, 2012 grantees that provided service to geographic areas with a population of 200,000 or more and received 49 U.S.C. 5307 funding were required to monitor the transit service provided throughout the grantee's service area.*

Periodic service monitoring activities were required to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making was equitable service. Grantees needed to implement one of four alternative monitoring procedures.

With FTA Circular 4702.1B, the requirements were updated to require grantees that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population to monitor services in a specific way. Fixed route transit providers who meet the threshold shall:

- Select a sample of minority and non-minority routes from all modes of service provided. The sample shall include routes that provide service to predominantly minority areas and non-minority areas.
- Assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies.
- Compare the transit service observed in the assessment to the transit provider's established service policies and standards.
- Analyze any route that exceeds or fails to meet the standard or policy, depending on the metric measured to determine why the discrepancies exist, and take steps to reduce the potential effects.
- Evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.
- Develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities.
- Brief and obtain approval from the transit providers' policy-making officials regarding the results of the monitoring program.
- Submit the results of the monitoring program as well as documentation to verify the policy board's or governing entity's consideration, awareness, and approval of the monitoring results to FTA every three years as part of the Title VI program.
- Monitoring shall be conducted, at a minimum, once every three years.

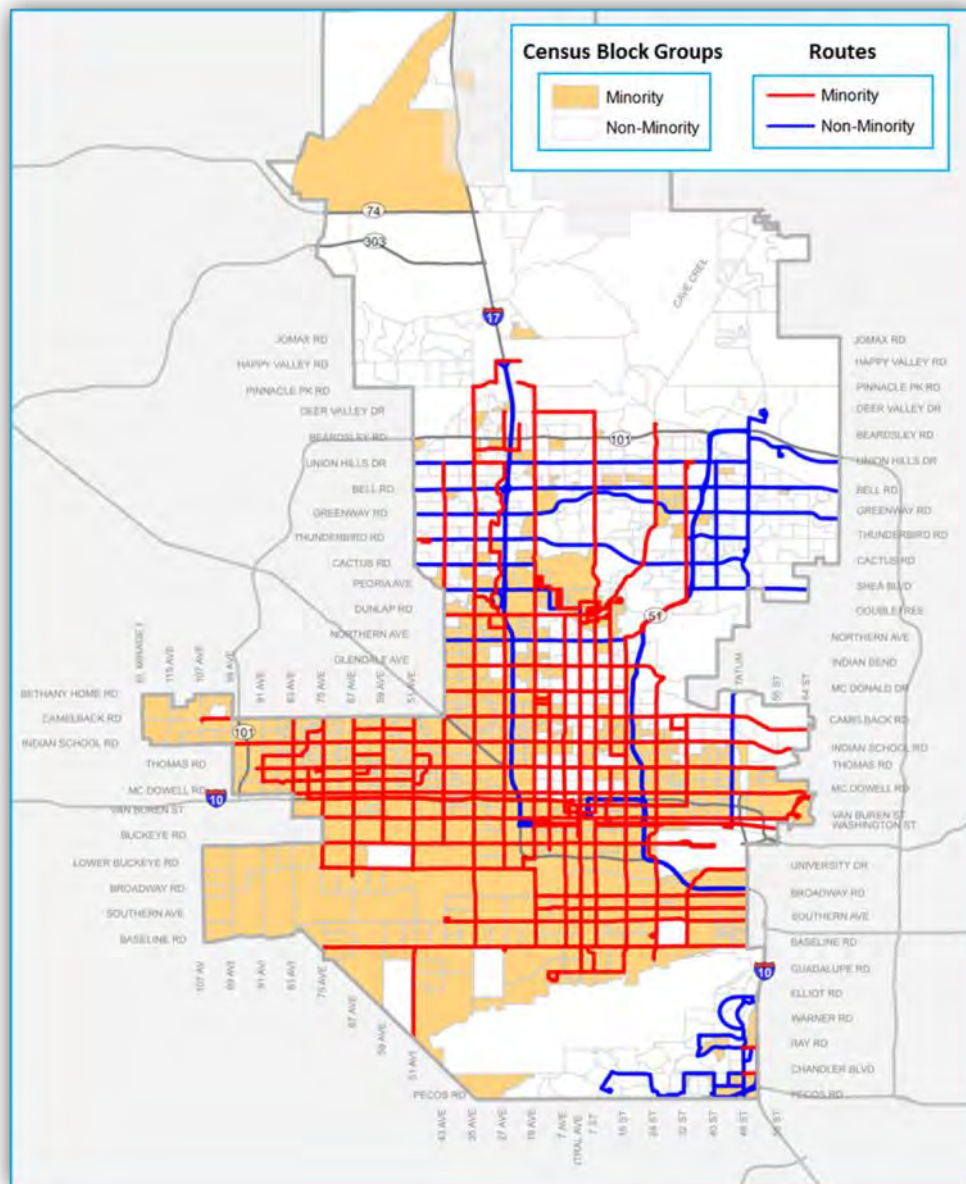


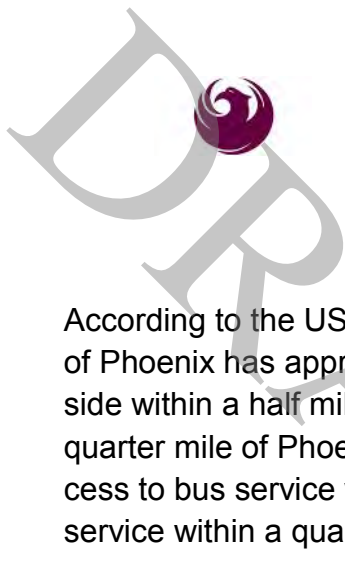


### City of Phoenix Public Transit Minority Population Overview

The following Title VI service and amenity analysis addresses each of the program monitoring requirements set forth by the FTA by comparing the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making was equitable service.

The following Figure provides an overview of the distribution of predominately minority areas as shown with bus routes in the City of Phoenix, both operated by the City of Phoenix and bus service purchased by the City. The routes are designated as minority or non-minority bus routes.





According to the US Census American Community Survey (ACS) 2013 Five Year Estimate, the City of Phoenix has approximately 1.45 million residents. Of those 1.45 million residents, 1.25 million reside within a half mile of Phoenix local bus service. Approximately 1 million residents reside within a quarter mile of Phoenix local bus service. That equates to 86% of Phoenix residents that have access to bus service within a half mile of bus service and 68% of residents that have access to bus service within a quarter mile.

The estimated minority population in Phoenix is 799,852, or 54.9% of the overall Phoenix population. Of this number, 90.8% of the minority population in Phoenix has access to local bus service within a half mile, and 74.5% has access to local bus service within a quarter mile. See the table below.

	Population	Minority Population
Phoenix	1,457,095	799,852
1/2 Mile from Local Routes	1,253,655	726,224
1/4 Mile from Local Routes	996,373	595,788
	Population	Minority Population
1/2 Mile Percentage	86.0%	90.8%
1/4 Mile Percentage	68.4%	74.5%

Data Source: US Census ACS 2013 Five Year Estimate

In 2011 there were 42 local routes serving the City of Phoenix. Of the 42 local routes, 34 routes had a higher percentage of minority population residing within a half mile of the route than the Maricopa County average. In 2011, 41% of residents in Phoenix were minority.

As of 2014, there are 44 local bus routes servicing the City of Phoenix. Thirty-three routes have a higher percentage of minority population within a half mile of the route segment than the Maricopa County average, meeting the minority route definition.

Refer to **Appendix A: City of Phoenix Title VI 3 Year Review 2011-2014** for a detailed breakdown to minority routes and non-minority routes.

In 2011, Phoenix operated 21 local routes outside of the Phoenix city boundary. For the route segments outside Phoenix, 11 routes had a higher percentage of minority population within half mile of the route than the Maricopa County average.

In 2014, Phoenix operated 18 local routes outside of Phoenix boundary. Nine of the 18 route segments outside Phoenix boundary had higher percentage of minority population than the county average.

Notes on major changes between 2011 and 2014:

- Route 17A merged with Route 17 in 2014
- Route 19 is on detour between Montebello and Dunlap due to light rail construction. (Connector route provided in the construction zone)
- Route 39 had major routing change
- Route 60 had major routing change
- Route 80 had major routing change
- Route 106 had major routing change
- Route 108 did not service Phoenix in 2011
- Route 156 did not service Phoenix in 2011
- Route 122 had major routing change
- Route 251 began serving Phoenix in January 2013.
- Route 17A merged with Route 17 in 2014
- Route 80 had major routing change
- Route 106 had major routing change

**1. Select a sample of minority and non-minority routes from all modes of service provided. The sample shall include routes that provide service to predominantly minority areas and non-minority areas.**

To monitor the performance of minority routes versus non-minority routes, a sample was taken of routes by mode and their level of service, average peak load, bus stop shade availability, and on time performance..

**Table 2** lists all routes servicing Phoenix by mode. According to census data, 33 of 44 local bus routes serving Phoenix are minority routes, four out of five circulators are minority routes and two of five RAPID commuter service routes are minority routes. A sample of high ridership minority routes and non-minority routes were selected for the comparison in **Table 3**.



**Table 2: Bus Service in Phoenix**

<b>Local Routes</b>				<b>Circulators</b>	
County	43.6%	County	43.6%	County	43.6%
City	54.9%	City	54.9%	City	54.9%
Route	% Minority	Route	% Minority	Route	% Minority
1	79.3%	51	65.0%	19C	59.9%
3	79.4%	52	89.1%	SMART	56.7%
7	52.4%	56	56.4%	MARY	87.5%
8	59.7%	59	67.0%	ALEX	34.8%
10	71.6%	60	65.2%	DASH	70.8%
12	54.8%	61	60.3%		
13	89.7%	67	69.4%		
15	57.2%	70	63.6%		
16	56.3%	72	34.4%		
17	71.7%	77	64.1%		
19	57.9%	80	36.2%		
27	57.7%	90	49.2%		
29	69.6%	100	58.5%		
30	45.8%	106	42.4%		
35	61.3%	108	34.3%		
39	25.2%	122	39.1%		
41	68.0%	138	27.6%		
43	61.7%	154	32.6%		
44	33.3%	156	47.6%		
45	56.0%	170	32.4%		
48	61.3%	186	27.2%		
50	58.5%	251	77.5%		
<b>Higher Than County Average</b>					

<b>RAPID</b>	
County	43.6%
City	54.9%
Route	% Minority
CSM	84.3%
I10E	33.0%
I10W	79.0%
I17	37.2%
SR51	25.5%

**Table 3: Sampled Routes**

	Minority Routes	Non-Minority Routes
Local	3, 17, 29, 35, 41, 70	106, 170
Circulator	MARY	ALEX
RAPID	I10W	SR51

**2. Assess the performance of each minority and non-minority route in the sample for each of the transit provider’s service standards and service policies.**

The City of Phoenix Public Transit Department uses the Valley Metro Regional Transit Standards and Performance Measures to evaluate its service performance.

Table ES-1 below lists Valley Metro’s service standard by transit service type.

**ES-1. Recommended Service Standards by Transit Service Type**

Service Type	Minimum Headway or Daily Trips	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	
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*	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 peak / 20 min base	18 hrs / 14 hrs / 12 hrs	Mon – Sun

\*60 min early morning and late night service

According to the Valley Metro Regional Transit Standards and Performance Measures, local routes are defined as either Local or Key Local routes. The Key Local bus route designation is based on the following metrics:

- Low-income population served
- Zero-auto ownership households served
- Past transit ridership (i.e., highest ridership routes)

The process for determining key local routes includes comparing the percentage of low-income persons and zero-auto households within a quarter-mile of each local route with the average percentage of low-income persons and zero-auto households for all local bus routes in the Valley Metro System. High volume routes are defined as routes with more than 1 million annual weekday boardings.

In addition to the transit standards listed above, the City of Phoenix Public Transit Department also monitors Maximum Load to Capacity Ratio, On Time Performance, and Percentage of Bus Stops in the City of Phoenix with Shade.

- **Maximum Load to Capacity Ratio:** Bus capacity set at 1.25X seating capacity
- **On Time Performance:** 90% on-time percentage
- **Percentage of Bus Stop with Shade:** 100%

Table 4: Sampling Route Performance

Local Route Sample				
Minority Routes	Peak Headway	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
3	10	65%	91.2%	71%
17	10	75%	93.0%	79%
29	8	67%	92.1%	80%
35	15	63%	91.2%	73%
41	10	76%	91.6%	77%
70	15	61%	90.1%	70%
Non-Minority Routes				
106	30	57%	94.2%	65%
170	30	61%	95.3%	93%
# Capacity set at 1.25X seating capacity				
Circulator Sample				
	Headway	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
MARY (Minority)	60	^	94.98%	*
ALEX (Non-Minority)	60	^	93.10%	*
*Many Circulator servicing roads do not have designated bus stops. Passenger flag down the bus to board the vehicle				
# Capacity set at 1.25X seating capacity				
^ Circulator vehicles are not equipped with APC sensor to capture calculate passenger load				
RAPID Sample				
	Peak Trips	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
I10W (Minority)	15	53%	93.03%	**
SR51 (Non-Minority)	13	42%	97.84%	**
** All Inbound bus stops for RAPID are Park and Rides and Transit Centers with shade				
# Capacity set at 1.25X seating capacity				



**City of Phoenix Bus Stops by Minority Status and Shade Structures**

	All	Shaded	Unshaded	%Shaded	%Unshaded	
Minority Stops	2,468	1,557	911	63%	37%	100%
Non-Minority Stops	1,565	1,000	565	64%	36%	100%

**3. Compare the transit service observed in the assessment to the transit provider’s established service policies and standards.**

**Peak Headway/Peak Trip**

**Minority Local Routes**

All sampled minority local routes are designated as Key Local Routes. The minimum standard for headway as a Key Local Bus is 15 minutes at peak hours. All six of our sampled routes equal or exceeded that standard ranging from eight to 15 minutes per trip.

**Non-Minority Local Routes**

All non-minority local routes are designated as Local Route. Minimum headway for Local routes is 30 minutes. Both of our sampled routes meet the headway requirement at 30 minutes.

**Circulators**

All circulators in the City of Phoenix are a free service. Minimum headway for circulator is 30 minutes. The headway for both Mary (Minority) and ALEX (Non-Minority) is every 60 minutes. The headway for these routes were reduced due to the recession and reduced funding available.

**RAPID**

Minimum daily trips for RAPID are 4 trips each in the AM and PM peak. I10W has 15 trips in the AM and PM peak. SR51 has 13 trips in the AM and PM peak.

**Minimum Span**

All routes sampled meet minimum span requirements.

**Minimum Operating Days**

All routes sampled meet minimum operating days.

**Average Maximum Load to Capacity Ratio**

All routes sampled are below average maximum load to capacity ratio (100%).

### **On Time Performance**

The On Time Performance goal for the City of Phoenix is 90%. All minority local routes are above the goal of 90%. All sampled Non-Minority Local routes and circulators meet the 90% goal.

### **Percent Stops with Shade**

None of the sampled routes has 100% shaded stop coverage. However, percentage shaded versus unshaded minority stops was 37% unshaded versus 63% shaded. Non-minority bus stops were 36% unshaded versus 64% shaded. Therefore, shaded stops are equitably distributed across both minority and non-minority stops. The City of Phoenix prioritizes the installation of shade at bus stops based on ridership demand. Ninety three percent of all Phoenix riders have shaded bus stops. Additional shaded bus stops are installed each year as funding allows.

- 4. Analyze any route that exceeds or fails to meet the standard or policy, depending on the metric measured to determine why the discrepancies exist, and take steps to reduce the potential effects.**
  
- 5. Evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.**

Routes that did not meet the minimum standard are:

#### **Peak Headway/Peak Trip:**

*Circulators:* Two out of 2 circulators do not meet 30 minute frequency standard. Minimum headway for circulators is 30 minutes. The headway for both Mary (Minority) and ALEX (Non-Minority) is every 60 minutes.

Prior to the recession, circulators in Phoenix all ran every 30 minutes. In 2010, circulator services were reduced to every 60 minutes as a result of reduced funding.

All Routes: One non-minority route – Route 122 – does not meet the 30 minute frequency standard.

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

**On Time Performance:** Three fixed routes – Route 50, 60 and 72 – fall below the 90 percent on-time performance standard.

### **Recommendations**

Based upon the performance standards outlined in the Valley Metro Regional Transit Standards and Performance Measures Phase I Report, the City of Phoenix Public Transit Department recommends the following methods to address inequities identified in its service monitoring effort:

#### *Peak Headway/Peak Trip*

Funding shortfalls keep frequency at 60 minutes until the economy improves or the City of Phoenix transportation tax initiative passes in the upcoming city election scheduled for August 25, 2015.

#### *On Time Performance*

Route 50 – The City of Phoenix Public Transit Department increased frequency on the core segment of the route in January 2014. It is recommended that the transit contractor deploy articulated buses when possible.

Route 60 – This route has been impacted by the construction of the northwest extension of light rail at Bethany Home Road and 19th Avenue. Light rail construction has been ongoing since January 2013 and is scheduled to be completed in the spring of 2016. Once construction concludes, on time performance on this route will improve.

Route 72 – This route is operated by Valley Metro and only three miles on the west side of the road is in Phoenix. The City of Phoenix will work with Valley Metro to address on time performance on this route.

#### *Percent Stops with Shade*

To reach a goal of 100% shaded stops, Phoenix Public Transit Department has budgeted \$300,000 annually to continue to add shade to all of its bus stops.

### **Summary**

The City of Phoenix Public Transit Title VI Service Monitoring Report is being submitted to the City of Phoenix City Council for consideration, awareness, and approval. The results of this monitoring effort will also be submitted to the FTA per Title VI program guidance in FTA Circular 4702.1B.

City of Phoenix Public Transit Title VI service monitoring shall be conducted once every three years.

**Appendix A: Title VI Three Year Review 2011-2014**

**All Local Routes Serving Phoenix**

County	41.8%	43.6%	1.9%	County	41.8%	43.6%	1.9%
Phoenix	53.1%	54.9%	1.8%	Phoenix	53.1%	54.9%	1.8%
Route	2011 % Minority	2014 % Minority	Difference	Route	2011 % Minority	2014 % Minority	Difference
<b>1</b>	76.2%	79.3%	3.1%	<b>51</b>	63.9%	65.0%	1.1%
<b>3</b>	79.2%	79.4%	0.2%	<b>52</b>	86.6%	89.1%	2.4%
<b>7</b>	52.4%	52.4%	0.0%	<b>56</b>	50.8%	56.4%	5.6%
<b>8</b>	60.6%	59.7%	-0.9%	<b>59</b>	66.0%	67.0%	0.9%
<b>10</b>	69.0%	71.6%	2.6%	<b>60</b>	56.3%	65.2%	9.0%
<b>12</b>	53.0%	54.8%	1.8%	<b>61</b>	57.4%	60.3%	2.8%
<b>13</b>	87.0%	89.7%	2.6%	<b>67</b>	67.5%	69.4%	1.9%
<b>15</b>	55.9%	57.2%	1.3%	<b>70</b>	61.5%	63.6%	2.1%
<b>16</b>	53.9%	56.3%	2.4%	<b>72</b>	32.2%	34.4%	2.2%
<b>17</b>	73.5%	71.7%	-1.8%	<b>77</b>	58.9%	64.1%	5.2%
<b>17A</b>	72.3%	N/A	N/A	<b>80</b>	51.8%	36.2%	-15.6%
<b>19</b>	61.1%	57.9%	-3.2%	<b>90</b>	46.4%	49.2%	2.7%
<b>27</b>	55.5%	57.7%	2.2%	<b>100</b>	57.5%	58.5%	1.0%
<b>29</b>	68.7%	69.6%	0.9%	<b>108</b>	N/A	34.3%	N/A
<b>30</b>	44.3%	45.8%	1.5%	<b>106</b>	35.9%	42.4%	6.5%
<b>35</b>	59.7%	61.3%	1.6%	<b>122</b>	42.5%	39.1%	-3.4%
<b>39</b>	26.2%	25.2%	-0.9%	<b>138</b>	25.1%	27.6%	2.5%
<b>41</b>	65.2%	68.0%	2.8%	<b>154</b>	29.8%	32.6%	2.8%
<b>43</b>	59.6%	61.7%	2.1%	<b>156</b>	N/A	47.6%	N/A
<b>44</b>	31.7%	33.3%	1.6%	<b>170</b>	30.5%	32.4%	1.9%
<b>45</b>	56.6%	56.0%	-0.6%	<b>186</b>	24.9%	27.2%	2.3%
<b>48</b>	58.5%	61.3%	2.7%	<b>251</b>	N/A	77.5%	N/A
<b>50</b>	54.9%	58.5%	3.5%				

Higher Than County Average

Data Source: US Census ACS 2013 Five Year Estimate



# Section 5: Attachment F - Title VI Service Monitoring Report



Title VI Service Monitoring Report  
City of Phoenix Public Transit Department

## Local Route Segments in Phoenix

County	41.8%	43.6%	1.9%	County	41.8%	43.6%	1.9%
Phoenix	53.1%	54.9%	1.8%	Phoenix	53.1%	54.9%	1.8%
Route	2011 % Minority	2014 % Minority	Difference	Route	2011 % Minority	2014 % Minority	Difference
1	76.3%	79.3%	3.0%	51	71.1%	71.8%	0.6%
3	80.6%	80.6%	0.1%	52	89.1%	89.2%	0.0%
7	52.4%	52.4%	0.0%	56	37.3%	43.5%	6.2%
8	60.6%	59.7%	-0.9%	59	88.3%	88.9%	0.6%
10	69.0%	71.6%	2.6%	60	47.1%	57.2%	10.1%
12	53.0%	54.8%	1.8%	61	86.1%	87.4%	1.3%
13	87.0%	89.7%	2.7%	67	86.5%	88.3%	1.8%
15	55.9%	57.2%	1.3%	70	57.4%	59.4%	2.1%
16	53.9%	56.3%	2.4%	72	23.8%	14.1%	-9.7%
17	77.4%	76.3%	-1.1%	77	79.2%	79.5%	0.3%
17A	82.4%	N/A	N/A	80	49.6%	40.4%	-9.2%
19	61.1%	57.9%	-3.2%	90	46.4%	49.2%	2.9%
27	55.5%	57.7%	2.2%	100	57.5%	58.5%	1.0%
29	74.9%	76.0%	1.1%	108	39.3%	43.3%	3.9%
30	78.4%	80.6%	2.3%	106	N/A	40.4%	N/A
35	59.7%	61.3%	1.6%	122	45.4%	39.1%	-6.3%
39	26.2%	25.2%	-0.9%	138	24.9%	27.4%	2.5%
41	70.3%	72.7%	2.4%	154	29.8%	32.9%	3.1%
43	59.6%	61.7%	2.1%	156	N/A	38.1%	N/A
44	31.9%	33.7%	1.8%	170	31.7%	N/A	N/A
45	90.2%	89.7%	-0.5%	186	25.1%	27.4%	2.3%
48	67.6%	70.6%	3.1%	251	N/A	77.5%	N/A
50	58.9%	58.1%	-0.8%				

Higher Than County Average



**Phoenix Operated Routes beyond Phoenix Boundaries**

County	41.8%	43.6%	1.9%
Phoenix	53.1%	54.9%	1.8%
<b>Route</b>	<b>2011 % Minority</b>	<b>2014 % Minority</b>	<b>Difference</b>
1	41.8%	N/A	N/A
3	72.8%	73.9%	1.1%
17	33.3%	56.2%	22.9%
17A	67.1%	N/A	N/A
29	32.1%	33.9%	1.8%
41	36.4%	38.2%	1.8%
50	53.9%	61.1%	7.2%
51	54.8%	56.4%	1.7%
59	53.7%	55.0%	1.2%
60	73.4%	75.3%	1.9%
67	56.5%	57.6%	1.1%
70	69.0%	71.4%	2.5%
80	56.4%	31.9%	-24.6%
90	47.3%	49.6%	2.3%
106	33.1%	41.0%	7.9%
122	31.5%	N/A	N/A
138	25.8%	28.1%	2.2%
154	15.3%	14.8%	-0.5%
170	23.1%	26.2%	3.1%
186	24.9%	27.5%	2.5%

Higher Than County Average

Notes on major changes between 2011 and 2014:

- Route 17A merged with Route 17 in 2014
- Route 19 is on detour between Montebello and Dunlap due to light rail construction. (Connector route provided in the construction zone)
- Route 39 had major routing change
- Route 60 had major routing change
- Route 80 had major routing change
- Route 106 had major routing change
- Route 108 did not service Phoenix in 2011

# Section 5: Attachment F - Title VI Service Monitoring Report

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- Route 156 did not service Phoenix in 2011
- Route 122 had major routing change
- Route 251 began serving Phoenix in January 2013.
- Route 17A merged with Route 17 in 2014
- Route 80 had major routing change
- Route 106 had major routing change

## Appendix B: City of Phoenix Bus Route by Minority Status and Bus Stop Shade

City of Phoenix Bus Routes by Minority Status and Bus Stop Shade									
Route	Minority Route	Total Stops in PHX	Total Minority Stops	Total Non-Minority Stops	Minority Stops with Shade Structure	Non-Minority Stops with Shade Structure	% of Route Minority Stops with Shade Structure	% of Route Non-Minority Stops with Shade Structure	Difference
1	Yes	55	53	2	37	2	70%	100%	30%
3	Yes	139	133	6	94	5	71%	83%	13%
7	Yes	209	105	104	68	60	65%	58%	(7%)
8	Yes	125	73	52	49	34	67%	65%	(2%)
10	Yes	71	49	22	26	16	53%	73%	20%
12	Yes	93	60	33	37	10	62%	30%	(31%)
13	Yes	82	74	8	28	3	38%	38%	(0%)
15	Yes	52	34	18	16	11	47%	61%	14%
16	Yes	167	103	64	63	47	61%	73%	12%
17	Yes	162	130	32	101	27	78%	84%	7%
19	Yes	191	103	88	72	61	70%	69%	(1%)
27	Yes	178	109	69	59	37	54%	54%	(1%)
28	No	32	28	4	9	-	32%	0%	(32%)
29	Yes	145	116	29	90	26	78%	90%	12%
30	Yes	39	27	12	14	9	52%	75%	23%
35	Yes	194	131	63	90	51	69%	81%	12%
39	No	48	3	45	3	31	100%	69%	(31%)
41	Yes	142	110	32	87	22	79%	69%	(10%)
43	Yes	101	64	37	43	24	67%	65%	(2%)
44	No	96	20	76	12	61	60%	80%	20%
45	Yes	60	60	-	39	-	65%	0%	(65%)
48	Yes	8	8	-	7	-	88%	0%	(88%)
50	Yes	133	76	57	50	30	66%	53%	(13%)
51	Yes	54	42	12	25	5	60%	42%	(18%)
52	Yes	65	65	-	28	-	43%	0%	(43%)
56	Yes	7	4	3	2	2	50%	67%	17%
59	Yes	39	38	1	20	1	53%	100%	47%
60	Yes	54	33	21	26	12	79%	57%	(22%)
61	Yes	81	77	4	53	3	69%	75%	6%
67	Yes	43	43	-	28	-	65%	0%	(65%)
70	Yes	145	95	50	59	42	62%	84%	22%
72	No	16	-	16	-	12	0%	75%	75%
75	No	36	36	-	10	-	28%	0%	(28%)
77	Yes	95	86	9	59	8	69%	89%	20%
80	No	80	25	55	21	30	84%	55%	(29%)
83	No	39	39	-	11	-	28%	0%	(28%)
90	Yes	106	53	53	33	29	62%	55%	(8%)
100	Yes	132	73	59	39	18	53%	31%	(23%)
106	No	55	43	12	27	9	63%	75%	12%
108	No	22	6	16	5	10	83%	63%	(21%)
122	No	32	10	22	7	13	70%	59%	(11%)
138	No	93	5	88	5	59	100%	67%	(33%)
154	No	107	16	91	7	34	44%	37%	(6%)
156	Yes	3	2	1	2	1	100%	100%	0%
170	No	107	20	87	19	81	95%	93%	(2%)
186	No	94	8	86	7	72	88%	84%	(4%)
251	Yes	22	22	-	15	-	68%	0%	(68%)



### Appendix C: City of Phoenix Bus Route Performance

#### Local Routes

Routes	Peak Headway	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade	Routes	Peak Headway	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
<b>Minority Local Route</b>					<b>Non-Minority Local Route</b>				
1	30	27.3%	93.4%	71%	39	30	21.4%	98.8%	71%
3	10	65.5%	91.2%	71%	44	30	76.9%	94.3%	76%
7	20	52.7%	92.0%	61%	72	20	49.0%	89.4%	75%
8	30	60.7%	94.8%	66%	80	30	67.3%	94.1%	64%
10	30	63.3%	95.6%	59%	106	30	56.6%	94.2%	65%
12	30	60.6%	95.3%	51%	108	30	35.0%	93.5%	68%
13	30	37.5%	96.3%	38%	122	60	11.4%	97.4%	63%
15	30	47.6%	97.1%	52%	138	30	40.8%	93.8%	69%
16	30	56.7%	95.9%	66%	154	30	81.1%	92.3%	38%
17	10	75.1%	93.0%	79%	170	30	61.1%	95.3%	93%
19	12	54.9%	94.8%	70%	186	30	41.8%	97.8%	84%
27	30	59.1%	92.3%	54%	# Capacity set at 1.25X seating capacity				
29	8	67.4%	92.1%	80%	X No Data				
30	30	57.6%	93.4%	59%					
35	15	62.9%	91.2%	73%					
41	10	75.6%	91.6%	77%					
43	30	62.4%	91.5%	66%					
45	15	57.6%	92.4%	65%					
48	30	32.5%	92.4%	88%					
50	10	82.1%	89.9%	60%					
51	30	54.6%	96.9%	56%					
52	30	66.2%	95.9%	43%					
56	15	49.9%	92.2%	57%					
59	30	74.2%	93.3%	54%					
60	30	69.8%	88.8%	70%					
61	15	59.5%	93.9%	69%					
67	30	77.9%	93.2%	65%					
70	15	60.6%	90.1%	70%					
77	30	68.8%	91.3%	71%					
90	30	60.6%	96.1%	58%					
100	10	91.4%	93.8%	43%					
156	30	46.2%	97.0%	100%					
251	60	X	91.8%	68%					



# Section 5: Attachment F - Title VI Service Monitoring Report



## Circulators

Route	Headway	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
<b>Minority Circulator</b>				
19C	15	^	75.7%	*
SMART	35	^	95.0%	*
MARY	60	^	95.7%	*
DASH	12	^	83.6%	*
<b>Non-Minority Circulator</b>				
ALEX	60	^	93.1%	*
*Many Circulator servicing roads do not have designated bus stops. Passenger flag down the bus to board the vehicle				
# Capacity set at 1.25X seating capacity				
^ Circulator vehicles are not equipped with APC sensor to capture calculate passenger load				

## RAPID

Route	Peak Trips	Avg Max Load to Capacity Ratio#	On Time Performance	% Stop with Shade
<b>Minority Route</b>				
CSM	5	17.9%	94.9%	**
I10W	15	52.7%	93.0%	**
<b>Non-Minority Route</b>				
I10E	15	46.5%	97.2%	**
I17	25	58.4%	98.3%	**
SR51	13	42.0%	97.8%	**
** All Inbound bus stops for RAPID are Park and Rides and Transit Centers with shade				
# Capacity set at 1.25X seating capacity				



## Title VI Compliance Monitoring Checklist Federal Transit Administration Review Area

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

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

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

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



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

- A demographic analysis of the service area, including demographic maps and charts completed since submission of the last Title VI Program that contains demographic information and service profiles?
- Data regarding customer demographics and travel patterns, collected from
- passenger surveys?
- Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official(s)'s consideration, awareness, and approval of the monitoring results?
- A description of the public engagement process for setting the "major service change policy" and disparate impact policy?
- A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the major service change policy and disparate impact policy?
- Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission?
- A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the equity analysis for any service or fare changes required by FTA C 4702.1B?

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

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

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

***Do the provider's public notices include:***

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

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



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

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

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

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

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

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

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

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

- Include the results of the Four Factor Analysis, including a description of the LEP population(s) served?
- Describe how the provider offers assistance services by language?
- Describe how the provider offers notices to LEP persons about the availability of language assistance?
- Describe how the provider monitors, evaluates, and updates the language access plan?
- Describe how the provider trains employees to provide timely and reasonable language assistance to LEP populations?



## Section 5: Attachment G - Title VI Compliance Monitoring Checklist



**City of Phoenix**  
PUBLIC TRANSIT DEPARTMENT

- Has the transit provider developed quantitative standards for all fixed route modes of operation for the indicators listed below:
- Vehicle load expressed, for example, as the ratio of passengers to the total number of seats on a vehicle expressed in terms of peak and off-peak times?
- Vehicle headway expressed, for example, for peak and off-peak service as an increment of time?
- An on-time performance standard with a defined level of performance, expressed as a percentage?
- Service availability as a general measure of the distribution of routes within the transit provider's service area?

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

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

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

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

- Demographic and service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations?
- A demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders?
- Fare usage by fare type among minority users and low-income users?
- Does the provider have a Title VI complaint form? Are the form and procedure for filing a complaint available on the provider's website? [FTA C 4702.1B, Chap. III-5]
- Does the provider notify the public that they may file discrimination complaints directly with the provider? [FTA C 4702.1B, Chap. III-5]
- Are the provider's notices detailing a recipient's Title VI obligations and complaint procedures translated into languages other than English, as needed, and consistent with the DOT LEP Guidance and the recipient's language assistance plan? [FTA C 4702.1B, Chap. III-4]
- Has the provider prepared and maintained a list of alleged discrimination on the basis of race, color, or national origin? [FTA C 4702.1B, Chap. III-5]
- Does the list include: [FTA C 4702.1B, Chap. III-5]
- Active investigations conducted by entities other than FTA?
- Lawsuits and complaints naming the provider?



- The date that the investigation, lawsuit, or complaint was filed?
- A summary of the allegation(s)?
- The status of the investigation, lawsuit, or complaint?
- Actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint?

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

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

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

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

- Conduct a service equity analysis for those service changes that meet or exceed the transit provider's "major service change policy"?
- Define and analyze the change between the existing and proposed service levels that would be deemed significant?

## Section 5: Attachment G - Title VI Compliance Monitoring Checklist



**City of Phoenix**  
PUBLIC TRANSIT DEPARTMENT

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

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

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

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

The City of Phoenix Public Transit Department –

<https://www.phoenix.gov/publictransit>

City of Phoenix History –

<https://www.phoenix.gov/pio/city-publications/city-history>

Valley Metro Overview –

<http://www.valleymetro.org/overview>

Valley Metro FY14 Fact Sheet –

[http://www.valleymetro.org/images/uploads/Valley\\_Metro\\_Agency\\_Fact\\_Sheet\\_Web\\_May\\_2015.pdf](http://www.valleymetro.org/images/uploads/Valley_Metro_Agency_Fact_Sheet_Web_May_2015.pdf)

*Maricopa County Department of Transportation Title VI Plan –*

<http://www.mcdot.maricopa.gov/technical/TitleVI/Title-VI-Plan.pdf>

Arizona Department of Transportation Title VI Assurances –

<http://www.azdot.gov/business/civil-rights/title-vi-nondiscrimination-program/title-vi-implementation>

*Maricopa Association of Governments FY 2015 ... Title VI Plan –*

[http://www.azmag.gov/Projects/Project.asp?CMSID=3881&MID=Human\\_Services](http://www.azmag.gov/Projects/Project.asp?CMSID=3881&MID=Human_Services)

*General Reporting Requirements for the RTC Transit Program Update Report and the Southern Nevada Metropolitan Transportation Planning Report under Title VI of the Civil Rights Act of 1964 –*

<http://www.rtcsnv.com/about-the-rtc/legal-notice-title-vi/>

*City of South Haven, MI Title VI Nondiscrimination Plan –*

[www.south-haven.com/pages/.../SH\\_Title\\_VI\\_Plan.pdf](http://www.south-haven.com/pages/.../SH_Title_VI_Plan.pdf)

U.S. Department of Transportation Federal Transit Administration Title VI Regulation 49 CFR 21

<http://www.gpo.gov/fdsys/pkg/CFR-2009-title49-vol1/content-detail.html>

U.S. Department of Transportation Federal Transit Administration Title VI Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”

[http://www.fta.dot.gov/documents/FTA\\_Title\\_VI\\_FINAL.doc](http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.doc)

U.S. DOT regulations on implementing Title VI of the Civil Rights Act –

[http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title49/49cfr21\\_main\\_02.tpl](http://www.ecfr.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title49/49cfr21_main_02.tpl)

U.S. Department of Justice guidance on implementation of Title VI –

<http://www.justice.gov/crt/about/coord/vimannual.pdf>



## Section 5: Attachment H - Resources

Executive Order 12898, Environmental Justice Executive Order

[http://www.fta.dot.gov/documents/Environmental Justice Executive Order.doc](http://www.fta.dot.gov/documents/Environmental_Justice_Executive_Order.doc)

Executive Order 13166, Limited English Proficiency

<http://www.justice.gov/crt/about/cor/Pubs/eolep.php>

DRAFT

**City of Phoenix  
Title VI Policy**

**Major Service Change Equity Evaluation  
Procedures Manual**

June 2015



**City of Phoenix Public Transit Department**

### **Introduction**

The purpose of this document is to document guidelines and procedures used by the City of Phoenix Public Transit Department for evaluating potential bus service changes in the City of Phoenix (includes both service operated by the City of Phoenix and service purchased by the City of Phoenix) and bus service operated by the City of Phoenix in other jurisdictions.

Title VI of the Civil Rights Acts of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Federal law requires the City of Phoenix to evaluate service changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. This manual will be utilized to evaluate bus services in an objective manner to identify the potential for adverse, disproportionately high, or disparate impacts to minority and/or low income populations.

### **Guidelines**

The City of Phoenix Title VI Policy is guided by two documents: City of Phoenix Title VI Ordinance adopted in 1990 (Attachment 1), (Attachment 2), and Valley Metro Title VI Procedures Manual adopted in 2013 and revised in 2015.

### **City of Phoenix Title VI Ordinance**

The Ordinance adopted by the Council of the City of Phoenix in 1990 stated that public comment will be solicited for all fare increases and substantial transit service changes. Substantial service changes are defined as follows:

1. When there is any change in service of:
  - a. 25 percent or more of the number of transit route miles of a route; or
  - b. 25 percent or more of the number of transit revenue vehicle miles of a route computed on a daily basis for the day of the week for which the change is made.
2. A new transit route is established.
3. Exceptions;
  - a. Headway adjustments of up to 5 minute peak hour and 15 minute non-peak hour service.
  - b. Standard seasonal variations.
  - c. An emergency situation, unless the emergency change will remain in effect for more than 180 days.
  - d. Experimental service changes that will be instituted for 180 days or less. If the experimental service is to remain in effect for more than 180 days and meets the requirement for a public hearing, a hearing may be held any time before the end of the 180 day period.

4. Public hearing requirements;
  - a. Prior to the institution of a fare increase or substantial service change, two notices of a public hearing shall be published in a newspaper of general circulation in the urbanized area. The notices shall also be published in newspapers oriented to specific groups or neighborhoods that may be affected.
  - b. The first notice shall be published at least 30 days prior to the public hearing.
  - c. The notices shall contain: (1) a description of the contemplated substantial services change and/or the fare increase as appropriate, and (2) the date, time and place of the hearing.
  
5. Applicability to Third Party Contract Requirements.
  - a. Any agency or firm which operates public transit service within the Phoenix urbanized area utilizing Federal Transit Grant Funds provided by the City of Phoenix, shall follow the above process to solicit and consider public comment prior to any fare increase or substantial service change.

**Valley Metro Title VI Procedures Manual – City of Phoenix Exceptions**

The City of Phoenix Public Transit Department adheres to the guidelines and procedures provided by the Valley Metro Title VI Procedures Manual with the following exceptions:

1. **Use of the Origin/Destination Survey as an Evaluation Method - Step 3: Socioeconomic Data Collection and Summation (Page 9 of Attachment 2).** For the demographic profile of residents near proposed service changes, the Valley Metro Title VI Procedures Manual recommends using U.S. Census Data or the Transit On-Board Origin-Destination Survey (O/D Survey). The City of Phoenix Public Transit Department will only use the U.S. Census Data as the source of demographic information for Title VI analysis. The following is the revised *Table 1. Service Change Equity Analysis Data Sources*.

Category	Action	Sub Action	Evaluation Method
Service Span	Reduction	N/A	<del>O/D</del> Census Data
	Expansion	N/A	
Service Headway	Reduction	N/A	<del>O/D</del> Census Data
	Expansion	N/A	
Route Length	Reduction	N/A	<del>O/D</del> -Census Data
	Expansion	N/A	Census Data
Route Alignment	Reduced Alignment	N/A	<del>O/D</del> -Census Data
	Expanded Alignment	N/A	Census Data
	Modified Alignment	Eliminated Segment(s)	
Segment(s) to New Areas			Census Data
New Route	New Route	N/A	Census Data

O/D: Origin/Destination Survey Data

The Census Data accounts for the demographic characteristics of the entire population whereas the O/D survey only considers current transit riders. Utilizing U.S. Census Data for demographic information instead of using O/D survey would allow the City of Phoenix to evaluate the impact of propose changes to the transit riders and the entire population residing within a half mile of the impacted area.



### **2. Title VI Analysis by Jurisdiction or Geographic Area: Step 5: Determination of Findings, Reporting, and Mitigation (Page 13 of Attachment 2)**

Under 4.1.1 Special Circumstances, the Valley Metro Title VI Procedures Manual states that “an analysis of equity impacts may be considered to determine whether the proposed service modification adversely affects population residing within a specific jurisdiction or geographic area.”

The City of Phoenix does not view Title VI analysis by jurisdiction or geographic area as optional. Any Title VI equity impacts analysis by the City of Phoenix will evaluate the route as a whole and by jurisdiction. Thus an equity analysis will evaluate potential service changes for a particular route specifically by jurisdiction in addition to the overall route. This will insure maximum protection for low income and/or minority populations.

### **3. Low-income Populations & Areas:**

For clarification and emphasis, the City of Phoenix definition of Low-income Populations & Areas are as follows:

Low-income populations are persons of whom poverty status is determined with an income of 150 percent or less of the national poverty line. “Low-income Areas” are census block groups where the percentage of population with an income of 150 percent or less of the national poverty line is higher than the percentage of population with an income of 150 percent or less of the national poverty line in the service area (Maricopa County).

### **4. Census Tracts vs Census Block Groups:**

Valley Metro Title VI Procedures Manual states that, “The service area percentage is derived by selecting all of the Census tracts (or other Census geographic units) within the service area and determining the minority and low-income populations relative to the entire population of the service area.” Instead of using census tracts as the geographic unit of measurement, City of Phoenix will use census block groups. Census Block Groups are statistical divisions of census tracts. They are generally defined to contain between 600 and 3,000 people. By using the small geographic unit census block groups, the analysis can focus on geographic areas that are closer to the true service area distance of ½ mile from the transit line versus using census tracts.

### **5. Service Equity Analysis Exemptions:**

Valley Metro Title VI Procedures Manual states that major service change thresholds exclude any changes to service that are caused by the discontinuance of a temporary transit service or demonstration service that has been in effect for less than 365 days and an adjustment to service frequencies and/or span of service for new transit routes that have been in revenue service for less than 365 days.

Based on the City of Phoenix Title VI Ordinance of 1990, exemption for major service change thresholds only exclude experimental service changes that will be instituted for 180 days or less. If the experimental service is to remain in effect for more than 180 days and meets the requirement for a public hearing, a hearing may be held any time before the end of the 180 day period.