Title VI Implementation Plan

ABILITY360

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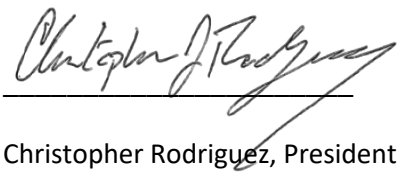
Title VI Policy Statement

The ABILITY360 policy assures full compliance with Title VI of the Civil Rights act of 1964 and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any ABILITY360 sponsored program or activity. There is no distinction between the sources of funding.

ABILITY360 also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, ABILITY360 will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

When ABILITY360 distributes Federal-aid funds to another entity/person, ABILITY360 will ensure all subrecipients fully comply with ABILITY360 Title VI Nondiscrimination Program requirements. The President & CEO has delegated the authority to April Reed, VP of Advocacy at ABILITY360, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Christopher Rodriguez, President & CEO

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI
ABILITY360

ABILITY360 operates its programs and services without regard to race, color, national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the ABILITY360.

For more information on the ABILITY360's civil rights program, and the procedures to file a complaint, contact April Reed, 602-443-0722, (TTY AZ Relay Service 7-1-1); email aprilr@ability360.org; or visit our administrative office at 5025 E. Washington Street, Suite 200 Phoenix, Arizona 85034. For more information, visit www.ability360.org

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

If information is needed in another language, contact April Reed at 602-256-2245. Para información en Español llame: April Reed, 602-256-2245.

The above notice is posted in the following locations:
Main office reception area at 5025 E Washington St., Ste 200 Phoenix Az 85034 and
https://ability360.org/title-vi-policy/

Aviso al público sobre el Título VI

Aviso al Público Sobre los Derechos Bajo el Título VI ABILITY360

ABILITY360 asegura complir con el Título VI de la Ley de los Derechos Civiles de 1964. El nivel y la calidad de El nivel y la calidad de servicios de transporte serán provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la ABILITY360's programa de derechos civiles, y los procedimientos para presentar una queja, contacte April Reed, 602-443-0722, (TTY AZ Relay Service 7-1-1); email aprilr@ability360.org; o visite nuestra oficina administrativa en 5025 E. Washington Street, Suite 200 Phoenix, Arizona 85034. Para obtener más información, visite www.ability360.org.

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

El aviso anterior está publicado en los siguientes lugares:
Oficina principal Area de recepción: 5025 E Washington St., Ste 200 Phoenix, Az 85034 y https://ability360.org/title-vi-policy/

Title VI Complaint Procedures

Any person who believes that he or she has been excluded from participation in, been denied the benefits of, or otherwise subjected to unlawful discrimination under any Ability360 service, program or activity and believes the discrimination is based upon race, color, national origin, may file a complaint with the Title VI Program Coordinator at Ability360.

A complaint can be filed with Ability360 by contacting April Reed, Title VI Coordinator at 602-443-0722. To request a form in alternative format, please contact April Reed at 602-443-0722 or aprilr@ability360.org Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence).

Once a complaint is received it will be assigned and an investigation will be conducted. Appropriate action will be taken based on the findings of the investigation. The City of Phoenix, as the designated recipient of the Federal Funds for Ability360, is responsible for monitoring the process.

To submit a claim by mail or in person, please fill out the printable complaint form and mail/take to:
Ability360 Center
Attn: April Reed
5025 E. Washington St., Ste 200
Phoenix, Az 85034
aprilr@ability360.org
Phone: (602) 443-0722

A complainant may also be filed directly with the City of Phoenix Public Transit Department or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding office of Civil Rights:

City of Phoenix Public Transit Department
ATTN: Title VI Coordinator
302 North 1st Avenue, Suite 900
Phoenix, AZ 85003

Federal Transit Administration (FTA)
ATTN: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington DC 20590

Título VI Procedimientos de Quejas

Cualquier persona que cree que él o ella ha sido excluida de la participación en, ha negado los beneficios de o esté sometido a discriminación ilegal bajo cualquier servicio, programa o actividad de Ability360 y cree que la discriminación se basa en la raza, color, origen nacional puede presentar una queja con el Coordinador del programa Título VI en el Ability360.

Una queja puede presentarse con Ability360 poniéndose en contacto con April Reed, Coordinador del título VI a 602-443-0722. Para solicitar un formulario en otro formato, póngase en contacto con April Reed en 602-443-0722 o aprilr@ability360.org Cualquier denuncia debe ser presentada dentro de 180 días del presunto acto discriminatorio (o última aparición).

Una vez recibida la denuncia se asignará y se llevará a cabo una investigación. Medidas se tomarán en base en los resultados de la investigación. La ciudad de Phoenix, como el designado receptor de los fondos federales para la Ability360, es responsable de supervisar el proceso.

Para presentar una reclamación por correo o en persona, por favor llene el formulario de queja para imprimir y correo/ tomar para:
Ability360 Center
Attn: April Reed
5025 E. Washington St., Ste 200
Phoenix, Az 85034
aprilr@ability360.org
Phone: (602) 443-0722

El demandante también puede presentarse directamente con el Departamento de público tránsito de ciudad de Phoenix o la administración de tránsito Federal (FTA) mediante la presentación de una queja directamente ante la correspondiente oficina de los derechos civiles:

City of Phoenix Public Transit Department
ATTN: Title VI Coordinator
302 North 1st Avenue, Suite 900
Phoenix, AZ. 85003

Federal Transit Administration (FTA)
ATTN: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington DC. 20590

Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	☐ Large Print	☐ Audio Tape
	☐ TDD	☐ Other

Section II:		
Are you filing this complaint on your own behalf?	☐Yes*	☐No
If you answered "yes" to this question, go to **Section III.*		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	☐Yes	☐No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

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.

_____

_____

_____

Section VI:		
Have you previously filed a Title VI complaint with this agency?	☐Yes	☐No

If yes, please provide any reference information regarding your previous complaint.

_____

_____

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court: _____ ☐ State Agency: _____

☐ State Court : _____ ☐ Local Agency: _____

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

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

_____ _____

Signature Date

Please submit this form in person at the address below, or mail this form to:

ABILITY360, VP of Advocacy (i.e. Title VI Coordinator)

5025 E. Washington Street, Suite 200

Phoenix, Arizona 85034.

602-443-0722

A copy of this form can be found online at www.ability360.org.

Título VI Formulario de Reclamación

Sección I:		
Nombre:		
Dirección:		
Teléfono (casa):	Teléfono (trabajo):	
Correo electrónico:		
Requisitos de formato accesible	☐ Letra grande	☐ Grabación
	☐ TDD	☐ Otro

Sección II:		
¿Está presentando esta denuncia en su nombre?	☐ Sí	☐No
** Si contestaste "sí" a esta pregunta, vaya a la sección III.*		
Si no, por favor suministrar el nombre y la relación de la persona para quien se quejan.		
Explique por qué usted está solicitando para otra persona:		
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de otra persona.	☐ Sí	☐No

Sección III:

Creo que la discriminación que viví fue basada en (marque todos que aplican):

☐ Raza ☐ Color ☐ Origen nacional

Fecha de la supuesta discriminación (mes, día, año): _____

Explicar lo más claramente posible lo que sucedió y por qué usted cree que fueron discriminados. Describir a todas las personas que participaron. Incluir el nombre e información de contacto de la persona que discriminó (si se conoce) así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el dorso de este formulario.

_____

_____

_____

Sección VI:		
¿Usted ha presentado anteriormente una queja del título VI con esta agencia?	☐ Sí	☐No

En caso afirmativo, proporcione por favor cualquier información de referencia sobre su queja anterior : _____
Sección V:
¿Se presentó esta queja con cualquier otro Federal, estado o agencia local o con cualquier Tribunal Federal o estatal? ☐ Sí ☐ No En caso afirmativo, marque todas las que aplican: ☐ Agencia Federal: _____ ☐ Tribunal Federal: _____ ☐ Agencia del Estado: _____ ☐ Corte Estatal: _____ ☐ Agencia de Local: _____
Por favor proporcionar información sobre una persona de contacto en la Agencia/tribunal donde se presentó la queja.
Nombre:
Título:
Agencia:
Dirección:
Teléfono:
Sección VI:
Nombre de denuncia de la agencia es contra:
Nombre de la persona que la denuncia es contra:
Título:
Localización:
Número de teléfono (si está disponible):

Usted puede conectar cualquier material escrito u otra información que crees que es relevante a su queja. Su firma y la fecha se requieren a continuación.

_____ _____

Firma Fecha

Por favor enviar este formulario personalmente en la siguiente dirección, o enviar por correo este formulario a:

ABILITY360, VP of Advocacy (i.e. Title VI Coordinator)
5025 E. Washington Street, Suite 200
Phoenix, Arizona 85034.
602-443-0722

Una copia de este formulario puede encontrarse en línea en www.ability360.org.

Title VI Investigations, Complaints, & Lawsuits

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

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

☐ ABILITY360 has NOT had any Title VI complaints, investigations, or lawsuits.

Public Participation Plan

ABILITY360 is a private, not-for-profit 501c3 organization that provides a limited amount of wheelchair accessible van transportation services to and from its program activities. Program participants are screened for eligibility and appropriateness and then offered transportation assistance based on availability. ABILITY360 also provides orientation and mobility training on use of various public transit systems including bus, light rail and dial-a-ride.

ABILITY360 engages the public and those consumers it directly serves in its planning and decision-making processes, as well as its marketing and outreach activities. The public and participating consumers are invited to participate in the process whether through public forums or surveys. As an agency utilizing wheelchair accessible vans partially purchased with federal financial assistance, ABILITY360 regularly makes the following community outreach efforts:

ABILITY360 produces a quarterly magazine called LivAbility, actively communicates to its consumers through various mediums including: social media platforms, website (i.e. www.ability360.org), email listservs, membership databases, and proactively solicits feedback about its programs and services. ABILITY360 also conducts consumer satisfaction surveys periodically of its programs and services. ABILITY360 will utilize all of these community outreach efforts in the upcoming year.

Limited English Proficiency Plan

ABILITY360 has adopted to follow the Valley Metro and City of Phoenix LAP Plan. See attached policy.

Non-elected Committees Membership Table

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

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

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

Describe the process the agency uses to encourage the participation of minorities on such committees should be included

ABILITY360 does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipients Title VI Compliance

ABILITY360 does NOT have subrecipients and does NOT monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

ABILITY360 has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed.

Board Approval for the Title VI Program

Ability360
Board Meeting Minutes
September 20th, 2021

I. CALL TO ORDER

Board Members Present:	Ron Brooks Tina Brown Vicki Copeland Todd Lemay Corey Lovato Trent Maruyama Greggory Ohannessian Nathan Pullen Andrew Reilly Susan Segal Susan Webb Candyce Williams Jill Wysolmierski
Board Members Absent:	Greg Hyland Catherine Sienko
Staff Present:	Christopher Rodriguez Keely Chiou
Call to Order:	The meeting was called to order at 5:20pm by Nathan Pullen, Board Chair.
Agenda	The agenda distributed prior to the Board meeting was reviewed. Andrew Reilly made a motion to approve the agenda. Susan Webb seconded the motion. The agenda was approved unanimously.
Executive Committee	Nathan Pullen provided the Executive Committee update to the Board. Nathan stated that he had no updates for the Board at this time.
	Legal & Regulatory Matters Chris stated that there were no legal and regulatory matters to update at this time.
Title VI Plan and	Chris presented the Title VI plan and policy for Board approval.

Policy

Compliance to Title VI is a requirement of Ability360's grant award from the Maricopa Association of Governments and the City of Phoenix Public Transit Department's Section 5310 Enhanced Mobility for Seniors and Individuals with disabilities. The Ability360 Title VI plan and policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any Ability360 sponsored program or activity.

Candyce Williams made a motion to approve the Title VI plan and policy and subsequent board resolution as written. Tina Brown seconded the motion. The motion carried unanimously.

III. ANNOUNCEMENTS & ADJOURNMENT

Announcement

The next scheduled Board meeting will be Tuesday, September 28th, 2021.

Vicki Copeland made a motion to adjourn the meeting. Corey Lovato seconded the motion. The motion carried. The meeting adjourned at 6:00 pm.

Respectfully submitted,

Trent Maruyama, Secretary **Date**

ABILITY360

Board of Directors Resolution
Regarding Title VI of the Civil Rights Act of 1964

WHEREAS, the Board of Directors of Ability360 has assembled in a meeting this:
20th day of September, 2021.

WHEREAS, ABILITY360 policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities.

WHEREAS, Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any ABILITY360 sponsored program or activity. There is no distinction between the sources of funding.

WHEREAS, ABILITY360 assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations.

WHEREAS, ABILITY360 will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

WHEREAS, When/if ABILITY360 distributes Federal-aid funds to another entity/person, ABILITY360 will ensure all subrecipients fully comply with ABILITY360 Title VI Nondiscrimination Program requirements.

WHEREAS, The President & CEO has delegated the authority to April Reed, VP of Advocacy at ABILITY360, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

BE IT RESOLVED, that Christopher Rodriguez may on behalf of this Corporation, be hereby authorized and empowered to execute and ensure full compliance to the requirements of this Title VI policy.

The undersigned, Nathan Pullen, Board Chair of Ability360, hereby certifies that the foregoing resolution was duly adopted and approved by the Board of Directors on the 20th day of September, 2021.

Nathan Pullen
Board Chair

Date: 9/20/2021

MAIN OFFICE
5025 E. Washington St.
Suite 200
Phoenix, AZ 85034

602/256.2245 Office
602/254.6407 Fax
7-1-1 AZ Relay

Board of Directors Resolution
Regarding Title VI of the Civil Rights Act of 1964

WHEREAS, the Board of Directors of Ability360 has assembled in a meeting this:
20th day of September, 2021

WHEREAS, ABILITY360 policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities.

WHEREAS, Title VI states that "no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination" under any ABILITY360 sponsored program or activity. There is no distinction between the sources of funding.

WHEREAS, ABILITY360 assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations.

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BE IT RESOLVED, that Christopher Rodriguez may on behalf of this Corporation, be hereby authorized and empowered to execute and ensure full compliance to the requirements of this Title VI policy.

The undersigned, Nathan Pullen, Chair of the Board of Ability360, hereby certifies that the foregoing resolution was duly adopted and approved by the Board of Director on the 20th day of September, 2021.

_____
Nathan Pullen
Chair of the Board

Date: 9/20/2021

Language Assistance Plan

Title VI Program

July 2021

1.0 INTRODUCTION

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

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

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

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

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

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

using the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

1.1 Regulatory Guidance

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

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

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

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

1.2 Four Factor Analysis

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

The four factor analysis involves the following:

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

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

2.0 LIMITED ENGLISH PROFICIENT POPULATION (FACTOR 1)

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

2.1 Evaluation Methods and Data Source

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

2.2 LEP Population Identification

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

2.3 American Community Survey

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

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

FIGURE 1: VALLEY METRO SERVICE AREA

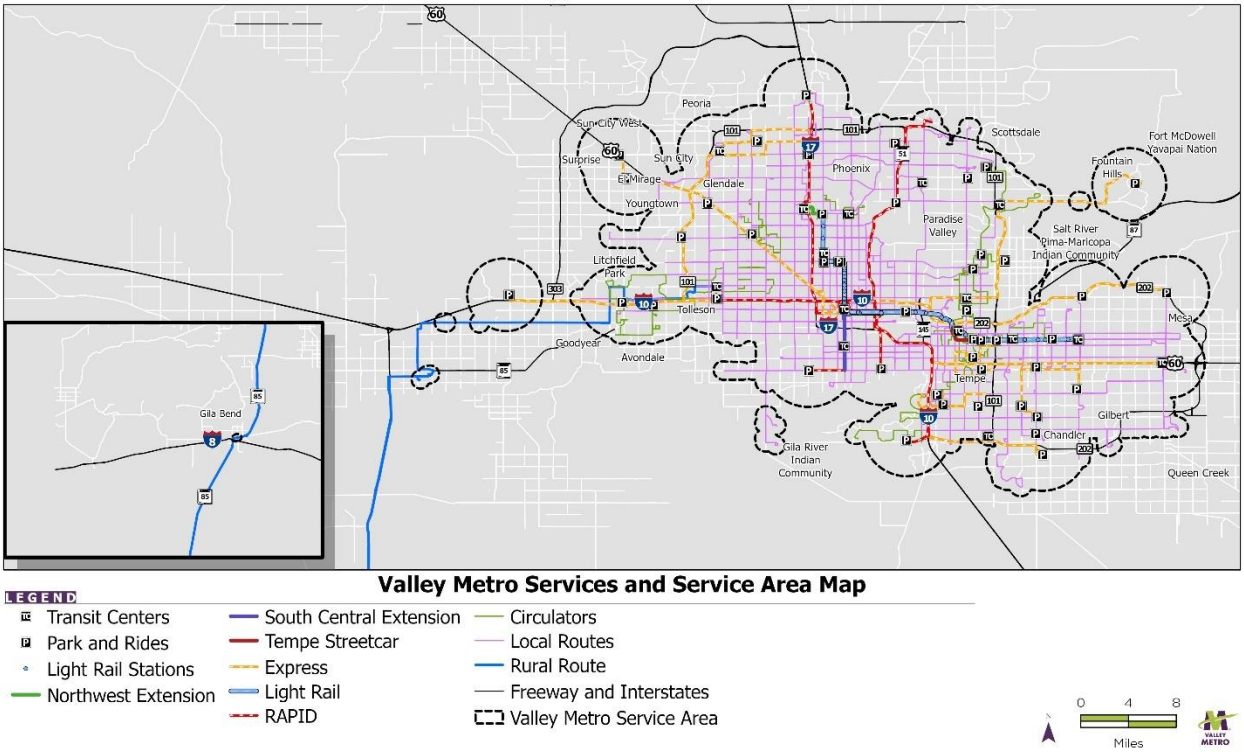


TABLE 1: 2019 ACS DATA, BY LOCATION

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

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

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

TABLE 2: 2019 ACS DATA, BY LANGUAGE CATEGORY

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

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

TABLE 3: 2019 ACS DATA, BY LINGUISTICALLY ISOLATED HOUSEHOLDS

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

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

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

FIGURE 2: CENSUS TRACTS WITH LINGUISTICALLY ISOLATED HOUSEHOLDS

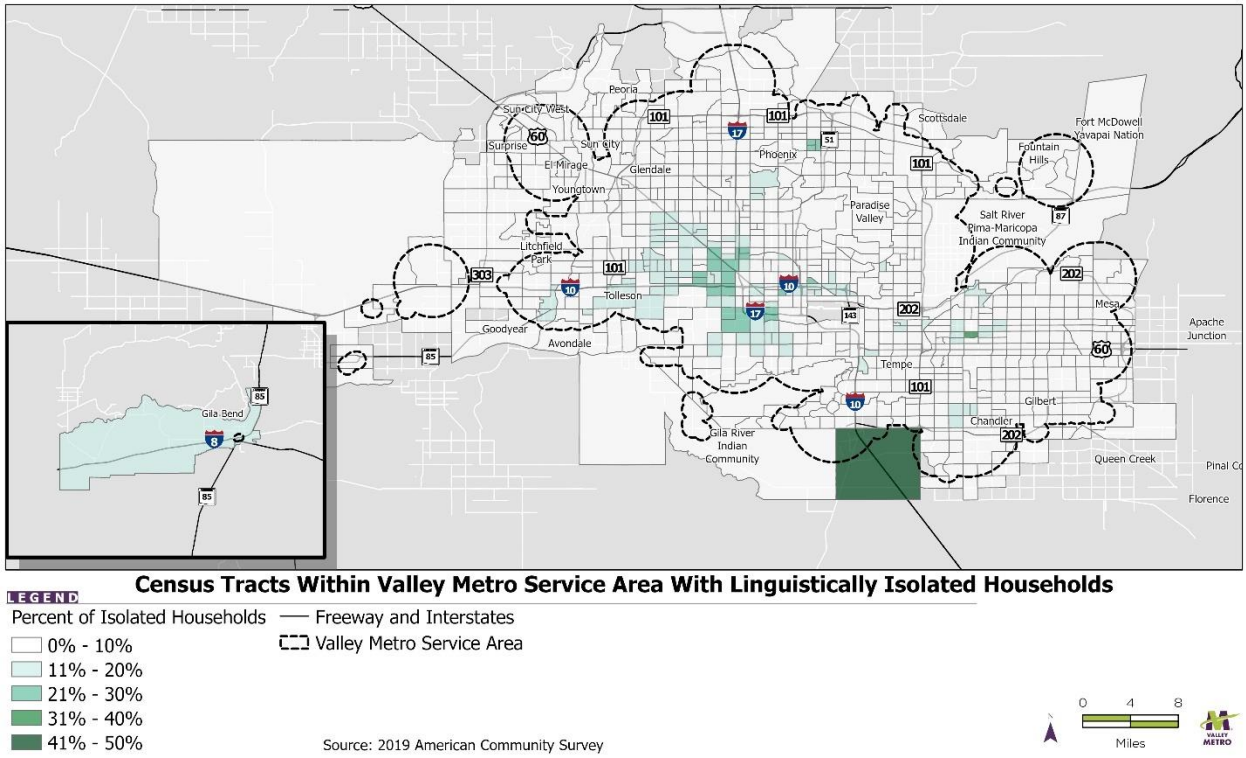
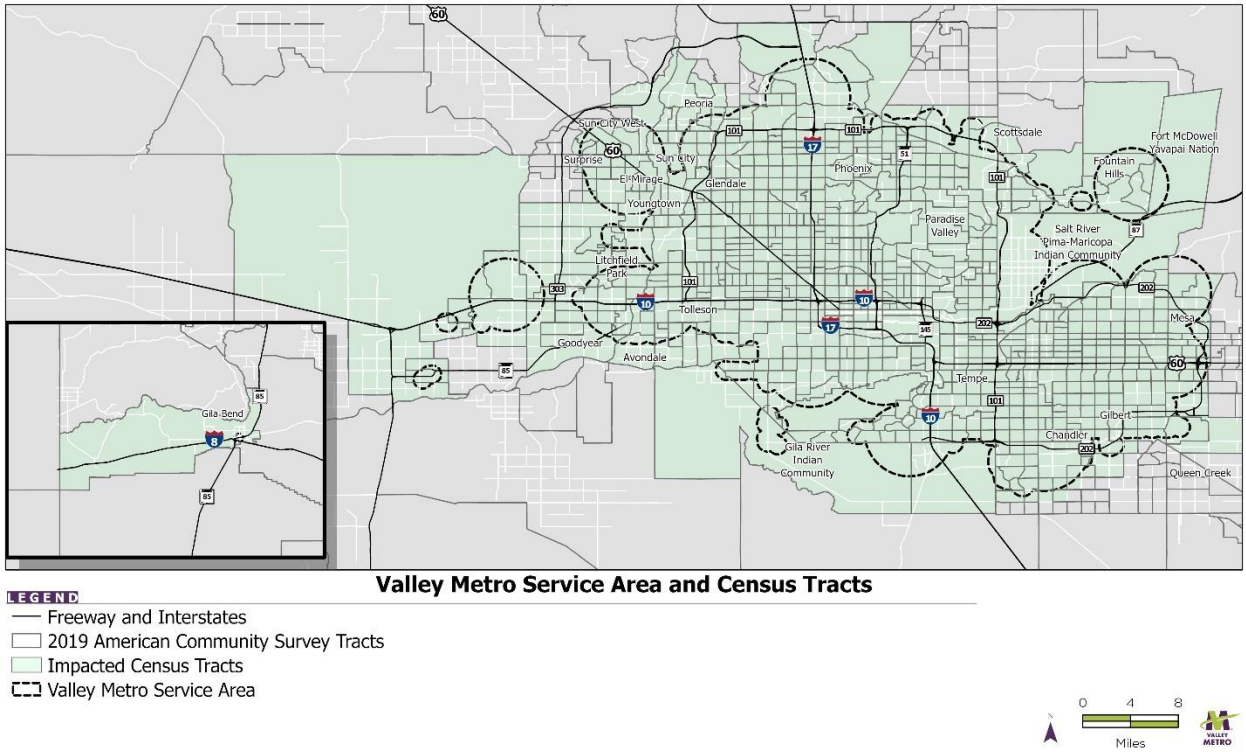


Figure 3 shows the ACS 2019 census tracts within the three-quarter mile buffer of local fixed route service and a three-mile buffer around park-and-ride and transit facilities for express bus service. Census tracts encapsulated within this area are included in the estimates, although they may not be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

FIGURE 3: CENSUS TRACTS WITHIN SERVICE AREA



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

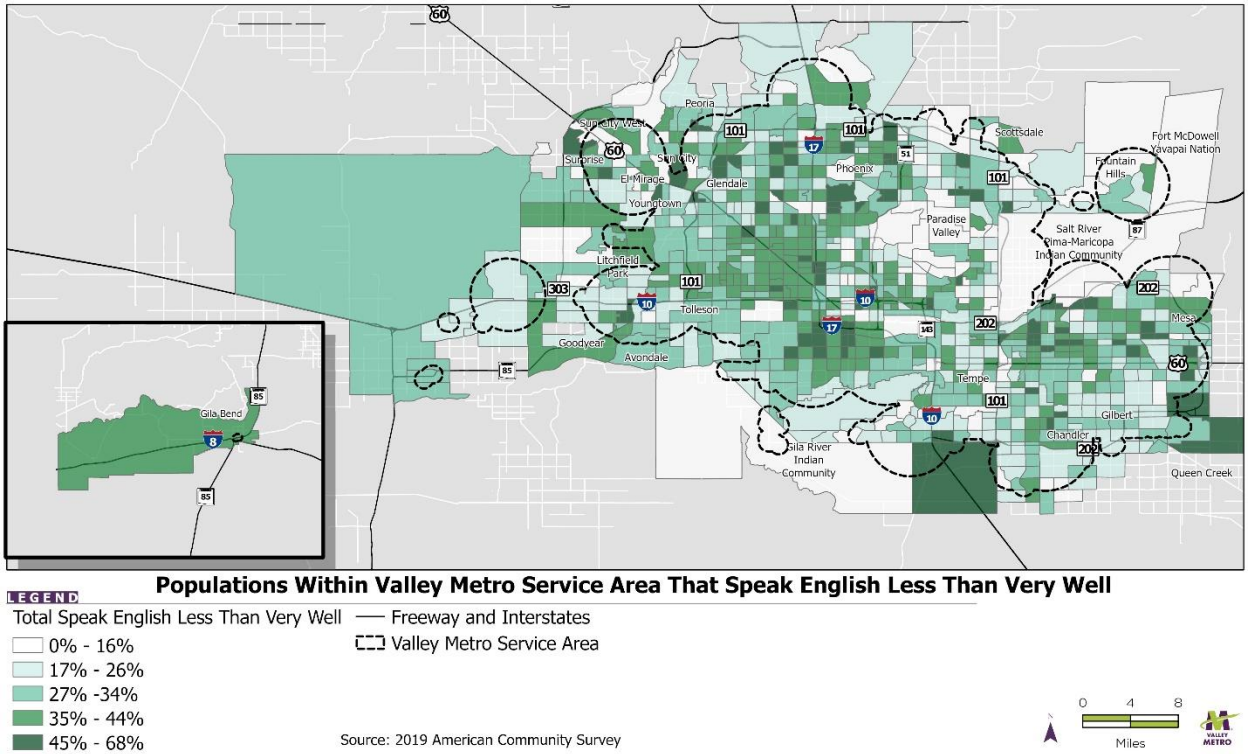
Within the service area, the majority of the 2019 LEP populations is the Spanish speaking population; this is the only language group to exceed both 1,000 individuals and five percent of the LEP population. The Spanish LEP population consists of 261,287 individuals within the service area. The Other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

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

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

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

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



Populations Within Valley Metro Service Area That Speak English Less Than Very Well

LEGEND

Total Speak English Less Than Very Well
- 0% - 16%
- 17% - 26%
- 27% -34%
- 35% - 44%
- 45% - 68%

Freeway and Interstates

Valley Metro Service Area

Source: 2019 American Community Survey

0 4 8 Miles

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

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

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

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

3.1 Evaluation Methods and Data Sources

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

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

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

3.2 Frequency of Contact Analyses

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

Transit Employee Surveys

During September and October of 2020, a voluntary survey of customer service and transit employees was conducted regarding interaction with LEP persons and languages spoken. A copy of the survey instrument can be found in **Appendix A**. Valley Metro

Customer Service Representatives provide passenger assistance most commonly through email, but also by phone. Several Customer Service Representatives that are stationed at transit passenger facilities[1] to provide assistance to passengers. Bus operators at multiple locations were also surveyed. Employees surveyed were based at one of the following locations:

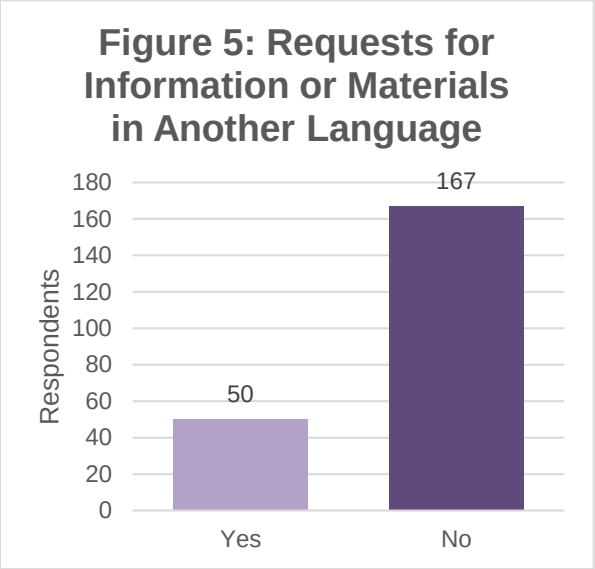
- Customer Service and Mobility Center
- Central Station Transit Center
- Ed Pastor Transit Center
- Metrocenter Transit Center
- Sunnyslope Transit Center
- Tempe Transportation Center
- East Valley Bus Operations and Maintenance Facility
- Mesa Bus Operations and Maintenance Facility
- Phoenix Bus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

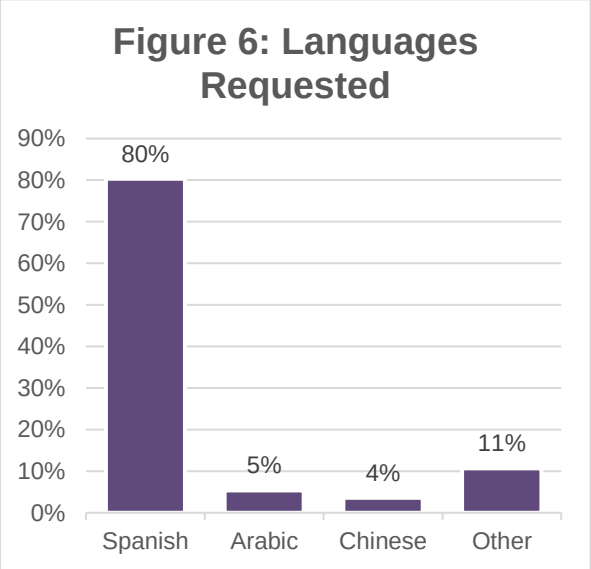
In total, 218 respondents provided information about their experiences. Approximately 80 percent of those surveyed were transit operators. When asked if staff have had any requests for materials in another language in the past two years, 23 percent responded yes; see **Figure 5**. Of these, most interpretation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

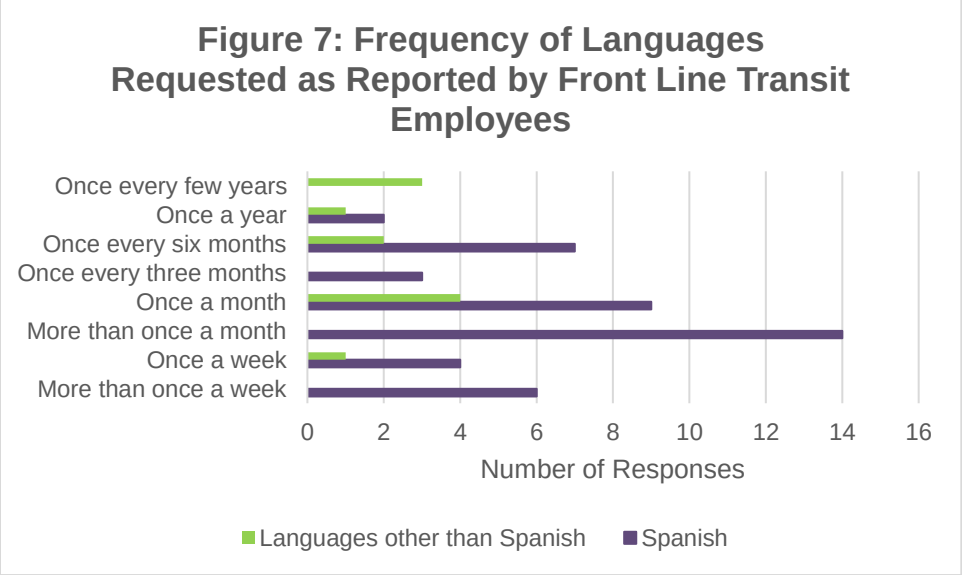
Languages requested were predominantly Spanish (80 percent) followed by Arabic (5 percent) and Chinese (4 percent). Other languages made up 11 percent of requests. These languages, which were each requested only once, were French, Russian, German, Farsi, Hindi and Swahili. See **Figure 6** for a graphic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

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

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







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

Customer Service Interactive Voice Response Call Log

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

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

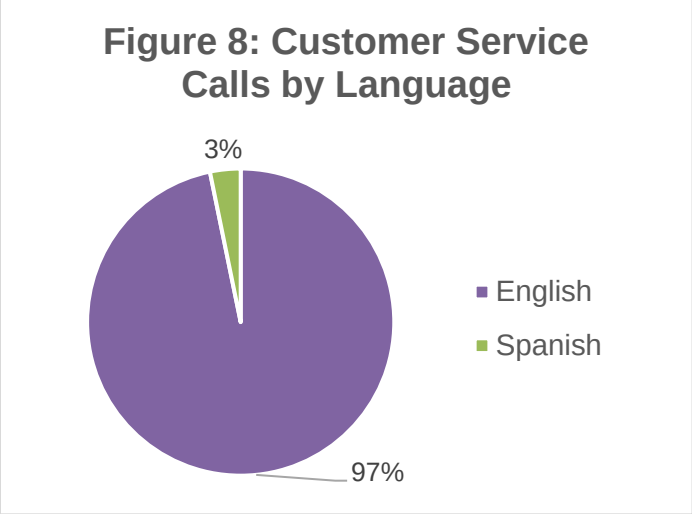
This system allows Spanish-speaking callers to be automatically transferred to a bilingual representative, reducing the time it takes to be served in the preferred language. Currently, eight bilingual customer service representatives are employed by Valley Metro. The phone system prioritizes selection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

TABLE 7: 2019 CUSTOMER SERVICE CALL LOG

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

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

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



Transit Education Program

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

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

Website Translation

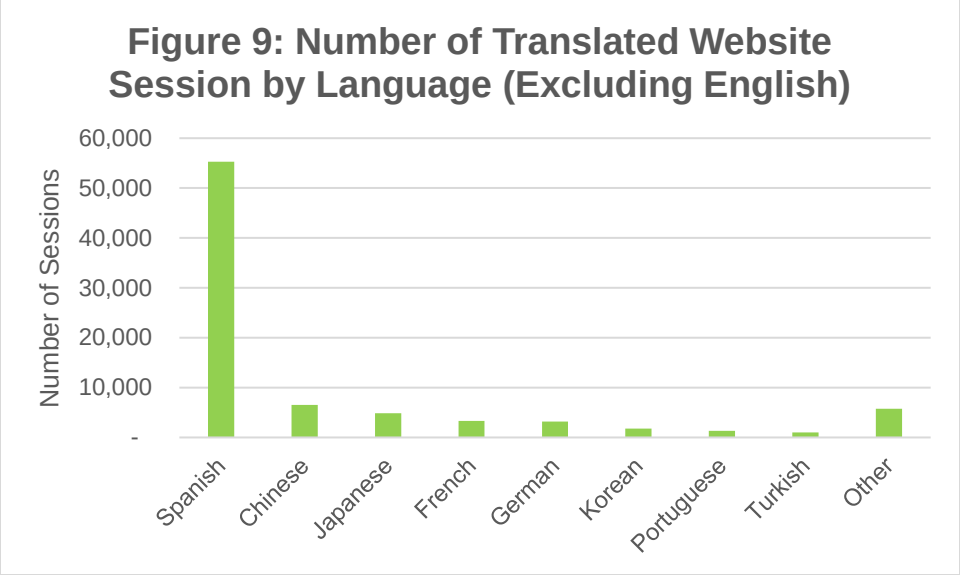
Apart from accessing information from transit employees—whether by phone, email, in person or another method—many customers use the www.valleymetro.org website for information. The website is equipped with the Google Translate feature, which allows translation into 52 languages. Users have translated the Valley Metro website into 43 different languages using this feature. Approximately 99 percent of interactions with the Valley Metro website used the default English setting. The remaining 1 percent used the other languages. **Table 8** lists the languages translated and the percentage of sessions

in 2019. Note that only those languages accounting for at least 0.01 percent of the total sessions are included; a full table of entries is available in **Appendix B**.

TABLE 8: 2019 WEBSITE SESSIONS BY LANGUAGE

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

Once again, Spanish was overwhelmingly the most widely used language with the website translation service, accounting for 0.96 percent of sessions, followed by Chinese (0.11 percent), Japanese (0.08 percent), French (0.06 percent), German (0.06 percent), Korean (0.03 percent, Portuguese (0.02 percent, Turkish (0.02 percent) and Other (0.10 percent). **Figure 9** shows the number of translated sessions by language.



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

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

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

Conclusion

The Factor 2 analysis revealed that there is regular contact between the LEP population and Valley Metro personnel. The Transit Employee Survey revealed that 23 percent of all respondents had encountered an LEP person; of those who had encountered a request for assistance in another language, 80 percent of respondents reported requests for Spanish. The Customer Service call log showed that a mere three percent of customers used one of the five Spanish options. Information from the Transit Education team qualitatively identified Spanish as the main language group. Finally, translation data from

the Valley Metro website indicated 1.5 percent of sessions were translated—most of which were translated to Spanish. The website was translated to 43 different languages. Overall, there is broad diversity in the Phoenix region population that accesses regional transit services; however, most people using the Valley Metro system speak English or Spanish.

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

The third step in the four-factor LEP needs assessment is an evaluation of the importance of Valley Metro services to persons with limited English proficiency. The first component of the Factor 3 analysis is to identify critical services. Next, input from community organizations was used to identify ways to improve these services for LEP populations. The USDOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons" (DOT 2005) advises that:

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

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

4.1 Services Provided

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

- Press Releases
- Public materials including, but not limited to:

- Route Scout (announcements on buses and light rail)
- Ride Guide and Destinations Guide
- Service changes materials
- Transit Book
- Website
- COVID-19 updates
- Project updates
- Title VI forms
- Large special events materials (for example, Super Bowl public materials)

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

    - Car cards (on-board advertisements)
    - Bus signage (priority seating, caution signs, entry/exit, etc.)
    - Variable message sign (VMS) [2] that displays audio announcements on buses

- Light Rail specific services:

    - Light rail transit vehicle signage including priority seating, code of conduct, and other train information
    - VMS[3] announcements on vehicles and at stations
    - System maps and auxiliary information
    - Operator call boxes on trains
    - Emergency call box at stations
    - Safe place notices

Critical Services

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

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

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

Basic trip information is available both printed and electronically in Spanish, including service hours, tickets, trip planning, airport and transit connections, parking, bicycles and services for persons with disabilities. Also available in Spanish is information regarding how to use transit, acceptable user conduct, priority seating, caution signs and exit locations on vehicles. Ticket vending is available in both Spanish and Braille. Many documents are available in Braille upon request. Emergency notification measures are also translated, including audio VMS Announcements on vehicles (bus and rail), operator call boxes, emergency call boxes and Safe Place notices.
Bilingual customer service representatives are available during regular call center hours. Representatives use the same procedures for comments and note that the inquiry was in Spanish so that a bilingual representative is assigned in any follow-up response if needed. Outside of customer service hours, the website is available for translation to most languages at any time. For public meetings and hearings, a Spanish translator is usually available; additional translators are available upon request or in the appropriate context. Typically, additional translation services requested are provided for American Sign Language through an on-call contract.

Community Outreach

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

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

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

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

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

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

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

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

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

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

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

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

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

5.1 Current Measures and Costs

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

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

Typically, an amount is embedded into the project costs by activity (logged under printing or other direct expenses) for translation and production of any materials. Agency-wide, there is an on-call contract for any interpretation needs. Any production costs are included in printing and public meetings budgets. Furthermore, bilingual employees provide intermittent language assistance needs as part of their other duties. The Valley Metro community outreach team hires with a preference towards bilingual speakers, especially for projects where LEP residents are prominent. Multiple employees in the community outreach team are fluent in Spanish. These employees may be assigned to prepare press releases or media events with Spanish-speaking publications in addition to their typical

duties. These costs are not tracked, although most of the formal interpretation services are contracted.

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

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

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

5.2 Cost-effective Practices

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

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

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

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

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

5.3 Additional Services and Budget Analysis

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

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

Other requests included using more symbols to depict messaging and system routes. Audio messaging using VMS that could potentially show messaging in another language as well. The light rail system VMS currently shows messages in English and Spanish. Bus messaging is typically location data and in close proximity, depending on stop locations. Some audio messages on buses are announced in Spanish. The feasibility and helpfulness of VMS translation should be evaluated.

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

5.4 Projected Costs

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

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

6.0 LANGUAGE ASSISTANCE MEASURES

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

6.1 Current Language Assistance Measures

Spanish Language Assistance

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

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

Notices to the public of language assistance measures are typically provided side-by - side with an English version of the document. For example, Ride Guide documents are provided in both English and Spanish and are available together wherever disseminated. Where available, documents are printed on both sides with an English version and a Spanish version on each side of the paper. When calling into the customer service line,

the interactive voice response system will automatically ask if Spanish is the preferred language prior to being connected with a representative.

Languages other than Spanish

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

6.2 Staff Training

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

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

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

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

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

6.3 Future Language Assistance Services

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

7.0 MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

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

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

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

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

APPENDIX A – TRANSIT EMPLOYEE INSTRUMENT

Language Assistance Program Survey 2021

Name: _____

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

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

2. Which language(s) have been requested?

_____

_____

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

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

    a. Yes
    b. Sometimes
    c. No

APPENDIX B – WEBSITE SESSIONS BY LANGUAGE

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

APPENDIX C – LEP COMMUNITY OUTREACH SURVEYS CONSOLIDATED

Ability 360

2/11/2021

1. What geographic area does your agency serve?

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

2. What kind of services does your organization provide?

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

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

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

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

   Increased over the last five years.

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

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

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

   I don't know.

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

   English
   Spanish
   Arabic

8. What is the age of your population?

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

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

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

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

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

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

    I don't know.

12. What are the most frequently traveled destinations?

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

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

    I don't know.

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

    I don't know.

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

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

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

    I don't know.

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

    I don't know.

Creighton School District

1/27/2021

1. What geographic area does your agency serve?

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

2. What kind of services does your organization provide?

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

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

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

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

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

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

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

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

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

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

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

8. What is the age of your population?

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

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

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

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

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

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

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

12. What are the most frequently traveled destinations?

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

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

    Not at this time.

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

    Yes.

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

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

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

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

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

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

International Rescue Committee

1/14/2021

1. What geographic area does your agency serve?

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

2. What kind of services does your organization provide?

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

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

   1,200+

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

   Decreased (COVID-19, public policy)

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

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

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

   Predominately rural

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

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

8. What is the age of your population?

   0-99

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

   Varies; predominantly below secondary school

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

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

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

    Refugees are dependent on public transportation

12. What are the most frequently traveled destinations?

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

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

    Employment around Buckeye and 83rd Ave

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

    No

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

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

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

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

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

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

Literacy Volunteers of Maricopa County

1/14/2021

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

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

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

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

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

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

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

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

9. What is the education and literacy level of the population you serve?
   Lower levels of literacy, compared to 4th grade level or lower.

10. What needs or expectations for public transportation services has this population expressed?
    Not aware of any.

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

12. What are the most frequently traveled destinations?
    Unknown

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

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

Unknown

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

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

17. Does your agency take advantage of Valley Metro resources such as transit education or ridesharing tools? Why or why not?
    No. Unaware of services.

Isaac Elementary School District

2/24/2021

1. What geographic area does your agency serve?

   Isaac Elementary School District is located in West Phoenix

2. What kind of services does your organization provide?

   Education

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

   3000 students

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

   Increased

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

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

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

   Both

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

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

8. What is the age of your population?

   Youth 5-11 years old

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

   Elementary school

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

    Students and families use public transportation

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

    Somewhat

12. What are the most frequently traveled destinations?

    Travel has decreased during COVID-19

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

    No

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

    Unsure

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

    Unsure

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

    People that speak their language

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

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

Turn a New Leaf

1/14/2021

1. What geographic area does your agency serve?

   Maricopa County

2. What kind of services does your organization provide?

   Housing, Shelter, Behavioral Health Services, Children Services

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

   Last year over 30,000

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

   Increased

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

   Mexico

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

   Urban

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

   Mostly English and Spanish

8. What is the age of your population?

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

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

   A majority or our participants have a GED

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

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

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

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

12. What are the most frequently traveled destinations?

    Mostly throughout mesa and phoenix

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

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

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

    Not anything noticeable

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

    Simple surveys by email or paper surveys offered at the programs

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

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

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

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