

Limited English Proficiency Plan

Community Outreach Program
Marketing Department
June 2024



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Introduction

Most individuals in the United States read, write, speak and understand English. However, there are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing services and benefits.

There are two pieces of legislation that provide the foundation for the development of an LEP plan: Title VI of the Civil Rights Act of 1964, and Executive Order 13166. In some circumstances, failure to ensure that LEP persons can effectively participate in federally assisted programs may constitute discrimination based on national origin under Title VI. To comply with Title VI, agencies should take reasonable actions for competent language assistance. Executive Order 13166 clarifies requirements for LEP persons under Title VI. The Executive Order requires the agency to examine the services it provides and to develop and implement a system by which LEP persons can meaningfully access those services.

This plan outlines five key areas of an effective LEP strategy: Identifying LEP individuals who need language assistance, primarily through Census data; Language assistance measures, including written and oral language services, and responding to LEP persons on the telephone, in writing and in person; Training staff, including coach operators, Customer Satisfaction representatives and management employees; Providing notice to LEP persons through both oral and written communications; and monitoring and updating the LEP plan through a variety of means.

Four Factor Analysis

The U. S. Department of Transportation (USDOT) issued its *Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (LEP) Persons* [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient’s entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons: 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient; 2) The frequency with which LEP individuals come in contact with the program; 3) The nature and importance of the program, activity or service provided by the recipient to people’s lives; and 4) The resources available to the recipient and costs. A brief description of the self-assessment undertaken in each of these areas follows.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.

Based on Languages Spoken at Home for the Population 5 Years and Over (Universe: Population 5 Years and Over) from table C16001 in the American Community Survey 5-year, 2016-2020 using Census Tracts. (**Appendices A**) Stats estimated by geospatial intersection. The study determined the major language groups in Pima County/Tucson, AZ Metro Area besides English are Spanish, Indo-European, Chinese (incl. Mandarin, Cantonese) and Arabic languages and other. The numbers of LEP persons in Tucson are shown in the table below, categorized by the language they speak at home. [U.S Census Bureau]

| All lines Population - Language spoken at home by English ability | | | | |
|---|----------------|-------------------------|------------------------------------|-------------------------|
| Topic | Rows | Columns | Year | Buffer |
| Population | Language sp... | English ability | 2020 | 0.75 mi |
| | | Speak English very well | Speaks English less than very well | Total |
| English | | 67.1% (396,954) | 0.0% (0) | 67.1% (396,954) |
| Spanish | | 19.4% (114,754) | 8.4% (49,556) | 27.8% (164,309) |
| French, Haitian, or Cajun | | 0.2% (1,417) | 0.1% (472) | 0.3% (1,889) |
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| Tagalog (incl. Filipino) | | 0.2% (1,285) | 0.1% (495) | 0.3% (1,780) |
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| Total | | 89.8% (531,675) | 10.2% (60,139) | 100.0% (591,814) |

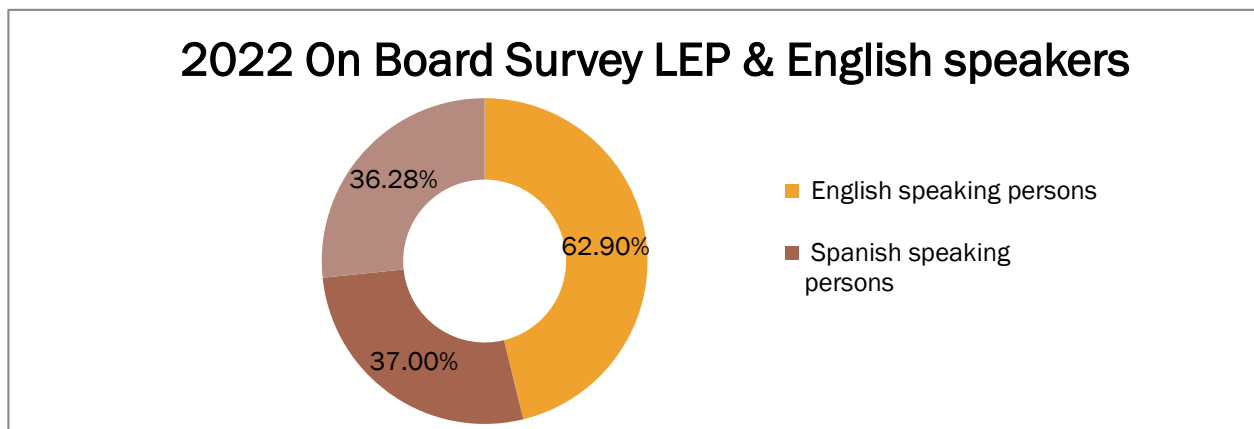
Language Spoken At Home For The Population 5 Years And Over (Universe: Population 5 Years and Over). From table C16001 in the American Community Survey 5-year, 2016-2020, using Census Tracts. Stats estimated by geospatial intersection.

As can be seen from the table, 134,721 are considered LEP and respond that they speak English less than “very well”. Of those who consider themselves LEP, 114,754 are Spanish speakers. Of the Spanish-speaking LEP persons 19.4% said they spoke English very well and 8.4% said less than well. By contrast, 0.6% of the Tucson population are LEP persons that Indo European languages, and similarly 0.7% Chinese and 0.4% Pacific Island languages. Other languages spoken than those listed make up 5,970 people or 1.0%. Taken together, LEP persons that speak a language other than Spanish make up 5.1% of the population surveyed.

Results from 2022 On-Board Survey related to language

The chart below illustrates the percentage of Spanish-speaking LEP persons, LEP persons that speak other languages, and English speakers in Tucson. Clearly Spanish speakers are the primary LEP persons likely to be encountered by Sun Tran and Sun Van. (Appendices A continued)

Languages spoken at home based on 2022 On-Board Survey;



Of the 7,699 surveys' collected, 88.9% of all riders surveyed responded that they speak English at home. 79.4% of all the riders surveyed responded that they speak Spanish at home. 27.2% of riders surveyed speak another language other than English at home.

The most predominant languages spoken at home by riders, as reported in the 2022 On-Board Survey, are listed as follows; (Table 5-25A: Other Languages Spoke at Home).

| Language respondent speaks at home other than English | Total Weight Factor (%) | SUNTRAN | SUNSHUTTLE | SUNLINK |
|---|-------------------------|---------|------------|---------|
| Spanish | 79.4% | 83.1% | 76.7% | 48.7% |
| Arabic, Standard | 2.2% | 1.4% | 1.6% | 8.7% |
| Other | 1.7% | 1.7% | 21.0% | 0.1% |
| French | 1.4% | 1.1% | 0.0% | 4.0% |
| Hindi | 1.1% | 0.1% | 0.0% | 10.2% |
| Russian | 1.1% | 1.0% | 0.8% | 2.0% |
| German | 1.0% | 1.0% | 0.0% | 1.5% |
| Japanese | 1.0% | 0.9% | 0.0% | 1.8% |
| American Sign Language (ASL) | 0.9% | 1.0% | 0.0% | 0.2% |
| Swahili | 0.9% | 1.0% | 0.0% | 0.0% |
| Korean | 0.8% | 0.8% | 0.0% | 1.5% |
| Old Persian | 0.8% | 0.8% | 0.0% | 1.1% |
| Italian | 0.6% | 0.3% | 0.0% | 3.0% |
| Vietnamese | 0.6% | 0.5% | 0.0% | 1.4% |
| Chinese, Mandarin | 0.6% | 0.3% | 0.0% | 3.4% |
| Somali | 0.5% | 0.5% | 0.0% | 0.9% |
| Chinese | 0.5% | 0.3% | 0.0% | 2.0% |
| Navajo | 0.4% | 0.5% | 0.0% | 0.0% |
| Hebrew | 0.3% | 0.3% | 0.0% | 0.8% |
| Filipino | 0.3% | 0.4% | 0.0% | 0.0% |
| Judeo-Malayalam | 0.3% | 0.4% | 0.0% | 0.0% |
| Chinese, Cantonese | 0.2% | 0.2% | 0.0% | 0.8% |
| Portuguese | 0.2% | 0.1% | 0.0% | 1.1% |
| Nepali | 0.2% | 0.0% | 0.0% | 2.0% |
| Portuguese creole of Tugo | 0.2% | 0.2% | 0.0% | 0.0% |
| Turkish | 0.2% | 0.1% | 0.0% | 0.8% |
| Afrikaans | 0.2% | 0.2% | 0.0% | 0.1% |
| Akan | 0.2% | 0.1% | 0.0% | 0.5% |
| Haitian Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Noric | 0.1% | 0.1% | 0.0% | 0.0% |
| Dari | 0.1% | 0.1% | 0.0% | 0.0% |
| Finnish | 0.1% | 0.1% | 0.0% | 0.0% |
| Hungarian | 0.1% | 0.0% | 0.0% | 1.1% |
| Jamaican | 0.1% | 0.1% | 0.0% | 0.0% |
| Ojibwa | 0.1% | 0.1% | 0.0% | 0.0% |
| Louisiana Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Kannada | 0.1% | 0.0% | 0.0% | 0.7% |
| Seselwa Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Old English | 0.1% | 0.1% | 0.0% | 0.0% |
| Ukrainian | 0.1% | 0.0% | 0.0% | 0.6% |
| Thai | 0.1% | 0.0% | 0.0% | 0.6% |
| Farsi, Eastern | 0.1% | 0.1% | 0.0% | 0.0% |
| Dutch | 0.1% | 0.1% | 0.0% | 0.0% |
| Norwegian | 0.0% | 0.1% | 0.0% | 0.0% |
| Yakut | 0.0% | 0.1% | 0.0% | 0.0% |
| Classical Greek | 0.0% | 0.1% | 0.0% | 0.0% |
| Indonesian | 0.0% | 0.0% | 0.0% | 0.0% |
| Nahuatl | 0.0% | 0.0% | 0.0% | 0.0% |
| Bengali | 0.0% | 0.0% | 0.0% | 0.0% |
| Urdu | 0.0% | 0.0% | 0.0% | 0.0% |
| Kreyol | 0.0% | 0.0% | 0.0% | 0.0% |
| Amharic | 0.0% | 0.0% | 0.0% | 0.0% |
| Ndebele | 0.0% | 0.0% | 0.0% | 0.3% |
| Tagalog | 0.0% | 0.0% | 0.0% | 0.0% |
| Dutch Creole | 0.0% | 0.0% | 0.0% | 0.0% |
| Swedish | 0.0% | 0.0% | 0.0% | 0.0% |
| Telugu | 0.0% | 0.0% | 0.0% | 0.1% |
| Malay | 0.0% | 0.0% | 0.0% | 0.1% |
| Czech | 0.0% | 0.0% | 0.0% | 0.0% |
| Early Contemporary Swedish | 0.0% | 0.0% | 0.0% | 0.0% |
| Aragonese | 0.0% | 0.0% | 0.0% | 0.0% |
| Danish | 0.0% | 0.0% | 0.0% | 0.0% |

2. The frequency with which LEP individuals that encounter the program in Tucson.

Sun Tran, Sun Link and Sun Van assess the frequency at which staff have or could possibly have contact with LEP persons. This includes examining census ACS data, surveys including the On-Board survey, phone inquiries, requests for translated documents, and staff feedback. As discussed above, U.S Census Bureau ACS data indicate that there is a moderate percentage (6.8%) of the general population of Tucson who are Spanish-speaking LEP persons. Furthermore, the 2010 – 2014 U.S. Census Bureau ACS data for Tucson indicates that 15% of those who take public transportation to work are LEP, further illustrating the importance of the service provided by Sun Tran, Sun Link and Sun Van to LEP persons. Phone inquiries and staff feedback also indicate that Spanish-speaking LEP persons have regular contact with the service. As a public transportation provider, it is necessary to recognize this substantial segment of the general population.

3. The nature and importance of the program, activity or service provided by the recipient to people’s lives.

Public transportation is vital to many people’s lives. According to the USDOT’s *Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (LEP) Persons*, “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, or education, or access to employment.”

4. The resources available to the recipient and costs.

Sun Tran, Sun Link and Sun Van assessed their available resources that could be used to provide language assistance. This included identifying bilingual staff, utilizing an existing contract for professional translation services, determining which documents should be translated, and deciding what level of staff training is needed.

After analyzing the four factors outlined in USDOT policy guidance, Sun Tran, Sun Link and Sun Van developed the following plan for providing language assistance to LEP persons.

Components of the Plan

There are five areas that comprise Sun Tran, Sun Link and Sun Van’s LEP plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the LEP plan

Identifying LEP individuals who need language assistance

As stated above, U.S. Census Bureau, 2010-2014 American Community Survey 5 Year Estimate data show that Spanish-speaking LEP persons are the primary group requiring language assistance. This information can also be used to identify concentrations of LEP persons within the service area.

Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures.

The zip code areas with the highest concentrations of LEP persons in Tucson are 85705, 85706, 85713, 85714 and 85756. Higher percentages of LEP persons can also be located by census tracts. A map indicating census tracts with a higher concentration of LEP persons than the Pima County average can be found in (Appendix B). In general, there are higher populations of LEP persons on the south and west sides of the city of Tucson, with the highest concentrations near I-10, I-19, Drexel Road and Aviation Highway. Within these regions, there are large areas where over 25% of the population is LEP. Most of the Sun Tran buses pass through one or more of these areas on their scheduled routes many times per day. As a result, many LEP persons ride throughout the city and utilize Ronstadt, Laos and Tohono Transit Centers to get to their destinations.

There are also several measures that can be taken to identify individual persons who may need language assistance:

- When open houses or public meetings are held, set up a sign-in table, and have a staff member greet and briefly speak to each attendee, to informally gauge his/her ability to speak and understand English.
- Have the Translation Assistance cards (**see Appendices F**) available at various events. While staff may not be able to provide translation assistance at the time, the cards are an excellent tool to identify language needs for future events/meetings and how to contact Customer Satisfaction to receive translation services via phone.
- Post a notice of available language assistance at open houses/public meetings to encourage LEP persons to self-identify.

Language assistance measures oral and written availability to LEP persons using transit services

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Sun Tran, Sun Link and Sun Van staff respond to LEP persons, whether in person, by telephone or in writing.

Spanish speaking callers are directed to a bilingual Customer Satisfaction Representative. They ensure that compliments/requests/complaints from LEP persons that could be considered national origin discrimination are forwarded to the Sun Tran Title VI Coordinator.

Oral

Bilingual Customer Satisfaction Representatives and Marketing Department staff are available upon call in to the Sun Tran Customer Satisfaction Center at (520)792-9222 and are available during every shift. Bilingual Customer Satisfaction Representatives are also located at the Laos Transit Center and Ronstadt Transit Center Monday-Friday 8:00 a.m. to 5:00 p.m. PST. Sun Tran offers Telecommunications Device for the Deaf (TDD) number for LEP persons who need to reach the Customer Satisfaction Department by calling (520) 628-1565.

Bilingual staff including Marketing is available for a variety of presentations and events, and as a rule, Spanish-speaking staff should be on hand at public meetings or open houses intended for gathering public input. There are many bilingual transit vehicle operators as well. Spanish-language advertising is also used to promote new and improved bus services. There are (3) three language assistance bus posters (**see Appendices C, D & E**) located on the Sun Tran fleet with information on languages

offered and to call Customer Satisfaction at Sun Tran (520)792-9222 x03) to access the Translation Assistance service number. When requested, an American Sign Language (ASL) Interpreter can be made available for online and in person events.

For riders calling Sun Van, Reservations can be reached at (520) 791-1000 x 11. Those calling this number will need to state their language of choice in English and will be transferred to the contracted vendor United Language Group for a translator in that language. When callers are Spanish speaking callers are directed to a bilingual Reservationist. Any written correspondence in Spanish is translated by an operations supervisor or the System Administrator and given to the appropriate manager/supervisor; their response is then translated into Spanish.

Sun Tran Bus Operators, Sun Van Operators, Sun Link Operators (when not in the Operators Cab) as well as the contracted Transit Security team are the most direct point of contact for LEP persons and have several methods to respond to an LEP individual. However, if the Operator or Guard are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the transit vehicle who can offer language assistance, the staff contacts dispatch, and a bilingual supervisor will communicate by radio, phone or in person to assist. Staff can direct LEP persons to the any one of the three posters (**see Appendices C, D & E**) on the Sun Tran buses so they can call Customer Satisfaction or they can hand them a Language Assistance business card (**see Appendices F**).

Written

In addition to these oral language services, there are three primary ways that Sun Tran, Sun Link and Sun Van provides written translation. Bilingual Customer Satisfaction Representatives respond to correspondence in Spanish. Bilingual Marketing Department staff members translate brochures, flyers and posters into Spanish. Translation of more complex and lengthy information is contracted out to a professional translator and utilizing a current contract for a translation service with the selected vendor.

Several written language services are available. Documents that are determined to be vital are translated into Spanish. When requested, documents such as the Ride Guide can be printed in Braille utilizing a current contract for a Braille service. Any of the transit materials can be printed in large print format via request to Customer Satisfaction. Vital documents are defined as those documents without which a person would be unable to access services.

The following are some examples of the written communications that are printed in both Spanish and English for Sun Tran, Sun Van and Sun Link:

- Transit Schedule booklets and brochures including but not limited to The Ride Guide
- Temporary signs at bus stops and transit centers, streetcar platforms for detours or route changes
- Strip cards containing information about route changes, detours, rider alerts or upcoming Public Input meetings
- ADA Paratransit Eligibility application
- Interior bus posters and stickers displaying safety or system information
- All rider survey's including the Onboard survey
- Streetcar Destinations Guide & How to Ride

- How to Ride Sun Van in English & Spanish
- Discrimination Complaint Form (see **Appendices G & H**)
- Language Assistance posters

The following are some examples of the written communications that can be printed in Braille or large print format:

- The Ride Guide can be printed into Braille (A minimum of a 20-business day lead time is required)

Large print format: can be accommodated for all transit materials.

Technology

When public instructional videos are created that cover topics considered vital, Sun Tran, Sun Link and Sun Van will produce them in English and Spanish, these instructional videos can be found at suntran.com or on the Sun Tran YouTube Social media channel at **SunTranTucson**.

Sun Tran, Sun Link and Sun Van websites have been consolidated into one transit website located at Suntran.com and is available in multiple languages translated by Google. The TRANSLATE button is located at the top right of the page to select the language you desire.

Sun Tran, Sun Link and Sun Van Transit Employee Training

There are four primary groups of staff members who are critical to the LEP plan: Vehicle operators, Security staff Customer Satisfaction Representatives, department directors and Marketing staff. Coach operators have the most frequent contact with LEP persons, through daily interaction with passengers. Customer Satisfaction Representatives also have frequent contact with LEP persons, either in-person or by telephone. These two groups are most likely to encounter LEP persons and thus provide language assistance. LEP training for both groups occurs during their initial departmental training.

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP plan. Properly training staff is a key element in the effective implementation of the LEP plan.

Instructional videos in English & Spanish for employees are located (but limited to) the password protected Driver Connection page on the website, classroom training, safety meetings and monitors located in the Driver lounges at each site as well as the Operators Information Guide.

Training topics for these groups include:

- Understanding the Title VI LEP responsibilities
- What language assistance services Sun Tran, Sun Link and Sun Van offer
- Specific procedures to be followed when encountering an LEP person

Department directors, including the General Manager and Assistant General Managers, are also crucial in implementing LEP policy. Copies of the LEP plan are distributed to all department directors, the General Manager and the Assistant General Managers, and it is their responsibility to disseminate LEP plan information to appropriate administrative staff. Department directors should ensure their staff understand Title VI responsibilities.

The Marketing department staff are another key element in the implementation of the LEP plan. They produce nearly all written forms of communication to the customer base and community and are instrumental in ensuring that the LEP plan is followed. Copies of the LEP plan are distributed to all Marketing staff to ensure that written communications adhere to the LEP plan guidelines.

Providing notice to LEP persons

There are several ways that Sun Tran and Sun Van provide notice to LEP persons that language assistance measures are available, through both oral and written communications:

- Both the Sun Tran Customer Satisfaction Center and the Sun Van Reservation line use an automated greeting in both Spanish and English, directing callers to select which language they prefer
- The *Ride Guide* cover provides the title and dates in both Spanish and English, indicating that the publication is accessible to Spanish speakers
- Other documents, including public meeting notices and open house announcements should include a tagline affirming that Sun Tran, Sun Link or Sun Van will make reasonable accommodations to translate any materials into Spanish, or to provide an interpreter
- A statement on suntran.com website indicating that language assistance is available

Monitoring and updating the LEP plan

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services, and to update the LEP plan when appropriate. At a minimum, Sun Tran, Sun Link and Sun Van will follow the Title VI Program update schedule for the LEP plan. Each update should take the following into account:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of LEP persons?
- What is the current LEP population in Tucson?
- Has there been a change in the types of languages where services are needed?
- Have available resources, such as technology, staff and finances changed?
- Were any complaints received?
- Do staff members understand the LEP plan policies and procedures?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to Spanish speakers. Feedback from the LEP community will be sought through community outreach events and presentations to determine the effectiveness of the plan in reaching LEP persons. Special consideration will be given to the LEP plan when service enhancements funded through the Regional Transportation Authority (RTA) are implemented, to ensure that LEP persons are aware of these services. Census data will also be reviewed as it becomes available to determine changes in the LEP population.

Future considerations for the LEP plan include:


- Providing all or part of the Sun Tran app in Spanish
- Translating other brochures or flyers into Spanish
- Updated Accessibility brochure
- Updated Translation Assistance business cards

- Providing group travel training to LEP persons by working with bilingual staff

Dissemination of the Limited English Proficiency Plan

The LEP Plan is located at suntran.com click on About then click on Reports. Copies of the plan can be provided to any person or agency or LEP persons upon request at info@suntran.com.

Any questions or comments regarding the Limited English Proficiency Plan can be directed to either of the following:

Community Outreach Manager
Sun Tran, Sun Link and Sun Van
3920 N. Sun Tran Blvd.
Tucson, AZ 85705
st-marketing@tucsonaz.gov 
Phone: 520.206.8881
Fax: 520.791.2285

Marketing & Communications Director
Sun Tran, Sun Link and Sun Van
3920 N. Sun Tran Blvd.
Tucson, AZ 85705
st-marketing@tucsonaz.gov
Phone: 520.206.8858
Fax: 520.791.2285

Appendix A

LEP Population for Tucson

| Population - Language spoken at home by English ability | | | | |
|---|-------------------------|------------------------------------|-------------------------|---------|
| Topic | Rows | Columns | Year | Buffer |
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Appendix A Continued

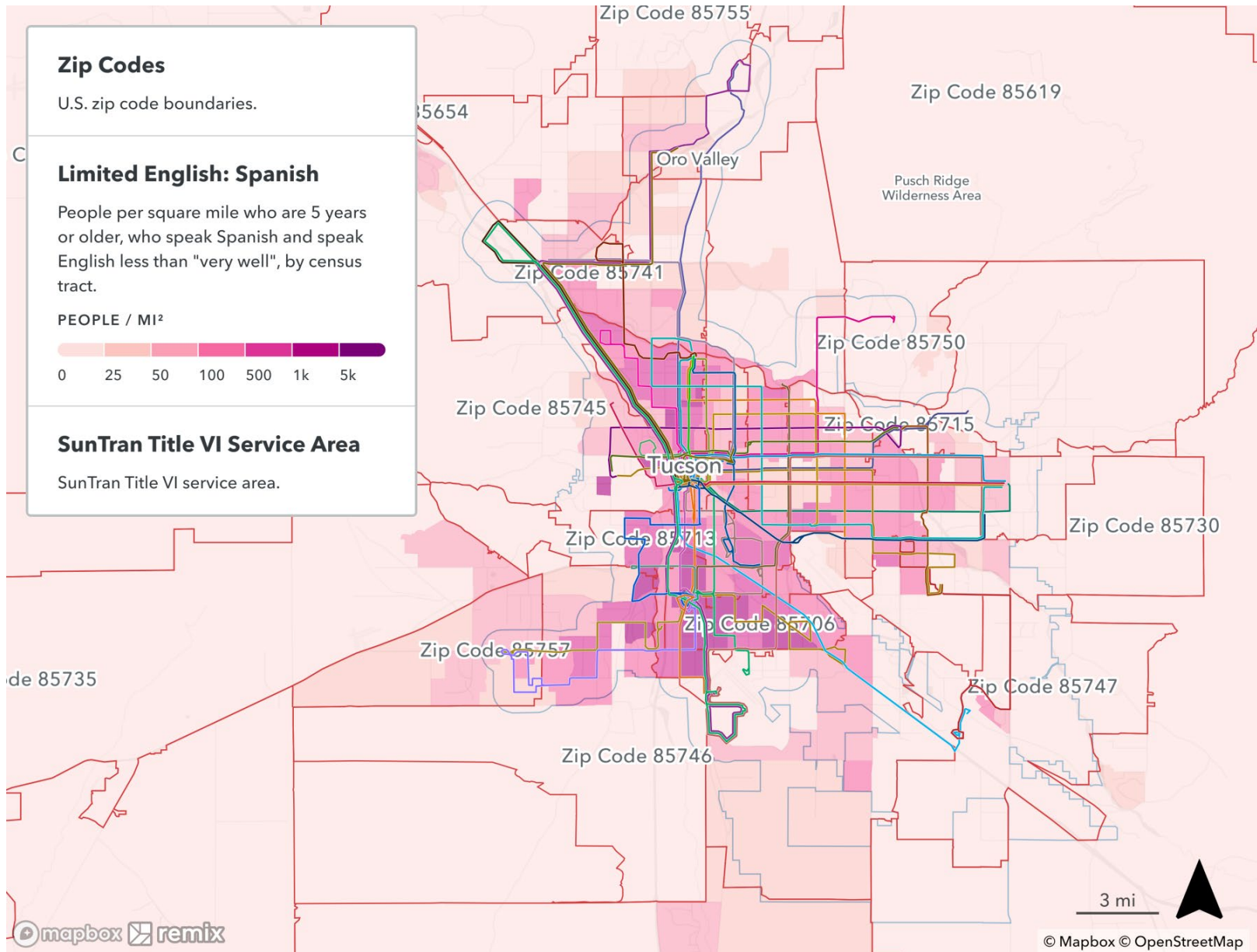
Languages spoken at home based on 2022 On-Board Survey;

The chart below illustrates the percentage of Spanish-speaking LEP persons, LEP persons that speak other languages, and English speakers in Tucson. Clearly Spanish speakers are the primary LEP persons likely to be encountered by Sun Tran and Sun Van. The most predominant languages spoken at home by riders, as reported in the 2022 On-Board Survey, are listed as follows; (Table 5-25A:Other Languages Spoke at Home).

| Language respondent speaks at home other than English | Total Weight Factor (%) | SUNTRAN | SUNSHUTTLE | SUNLINK |
|---|-------------------------|---------|------------|---------|
| Spanish | 79.4% | 83.1% | 76.7% | 48.7% |
| Arabic, Standard | 2.2% | 1.4% | 1.6% | 8.7% |
| Other | 1.7% | 1.7% | 21.0% | 0.1% |
| French | 1.4% | 1.1% | 0.0% | 4.0% |
| Hindi | 1.1% | 0.1% | 0.0% | 10.2% |
| Russian | 1.1% | 1.0% | 0.8% | 2.0% |
| German | 1.0% | 1.0% | 0.0% | 1.5% |
| Japanese | 1.0% | 0.9% | 0.0% | 1.8% |
| American Sign Language (ASL) | 0.9% | 1.0% | 0.0% | 0.2% |
| Swahili | 0.9% | 1.0% | 0.0% | 0.0% |
| Korean | 0.8% | 0.8% | 0.0% | 1.5% |
| Old Persian | 0.8% | 0.8% | 0.0% | 1.1% |
| Italian | 0.6% | 0.3% | 0.0% | 3.0% |
| Vietnamese | 0.6% | 0.5% | 0.0% | 1.4% |
| Chinese, Mandarin | 0.6% | 0.3% | 0.0% | 3.4% |
| Somali | 0.5% | 0.5% | 0.0% | 0.9% |
| Chinese | 0.5% | 0.3% | 0.0% | 2.0% |
| Navajo | 0.4% | 0.5% | 0.0% | 0.0% |
| Hebrew | 0.3% | 0.3% | 0.0% | 0.8% |
| Filipino | 0.3% | 0.4% | 0.0% | 0.0% |
| Judeo-Malayalam | 0.3% | 0.4% | 0.0% | 0.0% |
| Chinese, Cantonese | 0.2% | 0.2% | 0.0% | 0.8% |
| Portuguese | 0.2% | 0.1% | 0.0% | 1.1% |
| Nepali | 0.2% | 0.0% | 0.0% | 2.0% |
| Portuguese creole of Tugo | 0.2% | 0.2% | 0.0% | 0.0% |
| Turkish | 0.2% | 0.1% | 0.0% | 0.8% |
| Afrikaans | 0.2% | 0.2% | 0.0% | 0.1% |
| Akan | 0.2% | 0.1% | 0.0% | 0.5% |
| Haitian Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Noric | 0.1% | 0.1% | 0.0% | 0.0% |
| Dari | 0.1% | 0.1% | 0.0% | 0.0% |
| Finnish | 0.1% | 0.1% | 0.0% | 0.0% |
| Hungarian | 0.1% | 0.0% | 0.0% | 1.1% |
| Jamaican | 0.1% | 0.1% | 0.0% | 0.0% |
| Ojibwa | 0.1% | 0.1% | 0.0% | 0.0% |
| Louisiana Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Kannada | 0.1% | 0.0% | 0.0% | 0.7% |
| Seselwa Creole French | 0.1% | 0.1% | 0.0% | 0.0% |
| Old English | 0.1% | 0.1% | 0.0% | 0.0% |
| Ukrainian | 0.1% | 0.0% | 0.0% | 0.6% |
| Thai | 0.1% | 0.0% | 0.0% | 0.6% |
| Farsi, Eastern | 0.1% | 0.1% | 0.0% | 0.0% |
| Dutch | 0.1% | 0.1% | 0.0% | 0.0% |
| Norwegian | 0.0% | 0.1% | 0.0% | 0.0% |
| Yakut | 0.0% | 0.1% | 0.0% | 0.0% |
| Classical Greek | 0.0% | 0.1% | 0.0% | 0.0% |
| Indonesian | 0.0% | 0.0% | 0.0% | 0.0% |
| Nahuatl | 0.0% | 0.0% | 0.0% | 0.0% |
| Bengali | 0.0% | 0.0% | 0.0% | 0.0% |
| Urdu | 0.0% | 0.0% | 0.0% | 0.0% |
| Kreyol | 0.0% | 0.0% | 0.0% | 0.0% |
| Amharic | 0.0% | 0.0% | 0.0% | 0.0% |
| Ndebele | 0.0% | 0.0% | 0.0% | 0.3% |
| Tagalog | 0.0% | 0.0% | 0.0% | 0.0% |
| Dutch Creole | 0.0% | 0.0% | 0.0% | 0.0% |
| Swedish | 0.0% | 0.0% | 0.0% | 0.0% |
| Telugu | 0.0% | 0.0% | 0.0% | 0.1% |
| Malay | 0.0% | 0.0% | 0.0% | 0.1% |
| Czech | 0.0% | 0.0% | 0.0% | 0.0% |
| Early Contemporary Swedish | 0.0% | 0.0% | 0.0% | 0.0% |
| Aragonese | 0.0% | 0.0% | 0.0% | 0.0% |
| Danish | 0.0% | 0.0% | 0.0% | 0.0% |

Appendix B

Tucson Area Map - Concentrations of LEP Populations in Pima County by Zip Codes



Appendix C: Language Assistance Poster 1 on transit vehicles

Interpreter Services - Language Identification Card

Call this number and say (the name of your language in English) to the operator. Then stay on the line so a translator can help you.

(520) 792-9222 X 03

Customer Service



Spanish

Llame a este número y diga **"Spanish"** al operador. Luego, espere en la línea para ser atendido por un intérprete.

French

Appelez ce numéro et dites **"FRENCH"** à l'opérateur. Veuillez rester en ligne pour qu'un traducteur puisse vous aider.

Chinese

拨打这个电话，跟接线员说 **"CHINESE"**。然后在线等待，让翻译帮你。

German

Wählen Sie diese Nummer und sagen Sie **"GERMAN"** zum Operator. Bleiben Sie dann in der Leitung, und ein Dolmetscher wird Ihnen helfen.

Japanese

この電話番号へ発信して、その担当者へ・・・と話さない。**"JAPANESE"** それから、該当翻訳者があなたを補佐するから、通話状態のままでないさい。

Arabic

"اتصل بهذا الرقم وقل "Arabic" بالإنجليزية للمشغل. ثم ابقَ على الخط حتى يتمكن أحد المترجمين من مساعدتك."

Navajo

Bee díí béesh bee hane' é jiní **"NAVAJO"** dóó adiits' a'ii dooleet iishyeed ni.

Russian

Позвоните по этому номеру и сообщите оператору **"RUSSIAN"**. Затем оставайтесь на линии, чтобы получить помощь переводчика.

Vietnamese

Hãy gọi tới số này và nói **"VIETNAMESE"** cho tổng đài viên. Sau đó giữ máy để thông dịch viên có thể trợ giúp bạn.

Swahili

Pigia simu nambari hii na sema **"SWAHILI"** kwa operetta. Kisha bakia kwenye laini ili mfasiri awese kukusaidia.

Hebrew

ואמר זה הטלפון למספר התקשרו. הקו על הישאר מכן לאחר לנציג **"HEBREW"** המתורגמן מן עזרה לקבל מנת על.

Italian

Chiamare questo numero e dire **"ITALIAN"** all'operatore. Poi rimanete in linea così che il traduttore vi può aiutare.

Acholi

Go cim nama eni ci waci **"ACHOLI"** ci ikur dano maloko lep acholi bikonyi cut.

Afrikaans

Bel hierdie nommer en sê **"AFRIKAANS"** aan die operateur. Dan bly op die lyn, sodat 'n vertaler jou kan help.

Persian

بگویند اپراتور به و بگیرید تماس شماره این با مترجم تا بتوانید خط پشت سپس **"PERSIAN"**. کند کمک شما به.

Korean

이 번호로 전화하여 조직원에게 **"KOREAN"** 라고 말하십시오. 그 후에는 통역자가 도와줄 수 있도록 통화를 끊지 말고 기다리세요.

Tagalog

Tawagin mo ang numero at sabihin **"TAGALOG"** sa operator. Pagkatapos ay manatili sa linya sa gayon ang isang tagasalin ay maaaring makatulong sa iyo.

Thai

โทรหมายเลขนี้และพูดกับโอเปอเรเตอร์ว่า **"THAI"** จากนั้นรอสายเพื่อให้ล่ามช่วยเหลือคุณ.

(520) 792-9222 X 03

Customer Service

rev.1/20

Appendix D: Language Assistance Poster 2 on transit vehicles

한국어
이 번호로 전화하여
조직원에게 "KOREAN" 라고
말하십시오. 그 후에는 통역자가 도와줄
수 있도록 통화를 끊지 말고
기다리세요.

日本語
この電話番号へ発信して、その担当者
へ・・・と話さない。"JAPANESE"
それから、該当翻訳者があなたを補佐
するから、通話状態のままにない

عربي
"اتصل بهذا الرقم وقل "Arabic" بالإنجليزية للمشغل.
ثم ابقَ على الخط حتى يتمكن أحد المترجمين
من مساعدتك".

(520) 792-9222 X 03
Customer Service
sun tran sun van
sun LINK

Swahili
Pigia simu nambari hii na sema
"SWAHILI" kwa operetta. Kisha bakia
kwenye laini ili mfasiri awese
kukusaidia.

Filipino
Tawagin mo ang numero at sabihin
"TAGALOG" sa operator.
Pagkatapos ay manatili sa linya sa
gayon ang isang tagasalin ay
maaaring makatulong sa iyo

ไทย
โทรหมายเลขนี้และพูดกับโอเปอเรเตอร์ว่า
"THAI"
จากนั้นรอสายเพื่อให้ล่ามช่วยเหลือคุณ

rev. 1/20

Appendix E: Language Assistance Poster 3 on transit vehicles



The poster features a central dark blue box with white text and logos, surrounded by six white boxes with blue text, all set against a light blue background with a faint world map. The central box contains the phone number (520) 792-9222 X 03, the text 'Customer Service', and the logos for 'sun tran', 'sun van', and 'sun LINK'. The surrounding boxes provide instructions in French, Chinese, Russian, Vietnamese, German, and Diné Bizaad.

Français
Appelez ce numéro et dites **"FRENCH"** à l'opérateur. Veuillez rester en ligne pour qu'un traducteur puisse vous aider

中文
拨打这个电话，跟接线员说* **"CHINESE"**。然后在线等待，让翻译帮你

русский
Позвоните по этому номеру и сообщите оператору **"RUSSIAN"** Затем оставайтесь на линии, чтобы получить помощь переводчика.

(520) 792-9222 X 03
Customer Service
sun tran sun van
sun LINK

tiếng Việt
Hãy gọi tới số này và nói **"VIETNAMESE"** cho tổng đài viên. Sau đó giữ máy để thông dịch viên có thể trợ giúp bạn

Deutsche
Wählen Sie diese Nummer und sagen Sie **"GERMAN"** zum Operator. Bleiben Sie dann in der Leitung, und ein Dolmetscher wird Ihnen helfen

Diné Bizaad
Bee díí béesh bee hane' é jiní **"NAVAJO"** dóó adiits' a'ii dooleet iishyeed ni

rev 1/20

Appendix F: Interpreter Services Translation Card

Translation Assistance

available for Transit Services to include bus routes, schedules, complaints & compliments.



 Customer Service:
520-792-9222 x 03

Economy fare applications:
low-income, seniors, disabilities

Special Services:
520-791-4100



Reservations:
520-798-1000 x 11

12/15/19

| | |
|-------------|--------------------|
| Spanish: | Español |
| French: | Français |
| Chinese: | 中文 |
| German: | Deutsche |
| Japanese: | 日本語 |
| Arabic: | عربي |
| Navajo: | Diné Bizaad |
| Russian: | Русский |
| Persian: | پارسی |
| Vietnamese: | tiếng Việt |
| Swahili: | Swahili |
| Hebrew: | עברית |
| Italian: | Italiano |
| Acholi: | Acholi |
| Afrikaans: | Afrikaans |
| Korean: | 한국어 |
| Tagalog: | Filipino |
| Thai: | ไทย |

Appendix G: Discrimination Complaint Form in English



TRANSIT ADA DISCRIMINATION COMPLAINT FORM

Please print this form, complete and sign prior to mailing.

I. Complaint information:

Name: _____

Home Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ E-mail Address: _____

Is your American with Disabilities Act (ADA) complaint related to:

- Sun Tran Sun Van Sun Link Sun Shuttle
 Sun Shuttle Dial-A-Ride Sun Shuttle Dial-A-Ride (Oro Valley) On Demand

II. Please describe how you were discriminated against:

Beginning with the most recent incident, please list events in reverse chronological order by date(s), (route & bus # if known) of occurrence. Be specific. Attach additional pages, if necessary.

III. Please include the date(s), (route & bus # if known) you were discriminated because of a disability:

IV. What would you consider an appropriate resolution to your complaint?

V. Have you filed the same/similar complaint with another agency? Yes No

If yes, please list which agencies: _____

VI. Oath of Affirmation:

I affirm that the information I have provided in this complaint and any attachments is true and accurate to the best of my knowledge.

Sign: _____ Date: _____

Please return the completed complaint form with documentation relating to this complaint:

Email: suntraninfo@tucsonaz.gov
(use ADA in subject line)

Phone: (520) 792-9222

Sun Tran
Customer Service
3920 N. Sun Tran Blvd.
Tucson, Arizona 85705

Appendix H: Discrimination Complaint Form in Spanish



FORMULARIO: QUEJAS DE DISCRIMINACIÓN ADA DE TRÁNSITO

Por favor, imprima este formulario, complete y firme antes de enviarlo por correo.

I. Información del quejante:

Nombre: _____

Domicilio: _____

Ciudad: _____ Estado: _____ Zona Postal: _____

Número de Teléfono: _____ Correo Electrónico: _____

Es su queja sobre la Ley de Americanos con Discapacidades (ADA) relativa a:

- Sun Tran Sun Van Sun Link Sun Shuttle
 Sun Shuttle Dial-A-Ride Sun Shuttle Dial-A-Ride (Oro Valley) On Demand

II. Describa cómo fue discriminado en relación con el tipo de queja:

Comenzando con el incidente más reciente, por favor indique los eventos en orden cronológico inverso por fecha(s), (ruta y autobús si se conoce) de ocurrencia. Se específico. Adjunte páginas adicionales, si es necesario.

III. Favor incluya la fecha(s), (ruta y #autobús si se conoce) en cual usted fue discriminado debido a una discapacidad:

IV. ¿Qué consideraría usted una resolución apropiada para su queja?

V. ¿Ha presentado esta queja igual/similar ante otra agencia? Sí No

Si así es el caso, favor de identificar cuáles son las agencias:

VI. Juramento de afirmación:

Afirmo que la información que he presentado en esta queja y sus anexos es verídica y exacta según mi entender.

Firma: _____ Fecha: _____

Favor de devolver el formulario completo con la documentación relacionado esta queja a:

Correo Electrónico: suntraninfo@tucsonaz.gov
(Use Discriminación ADA en la línea de asunto)

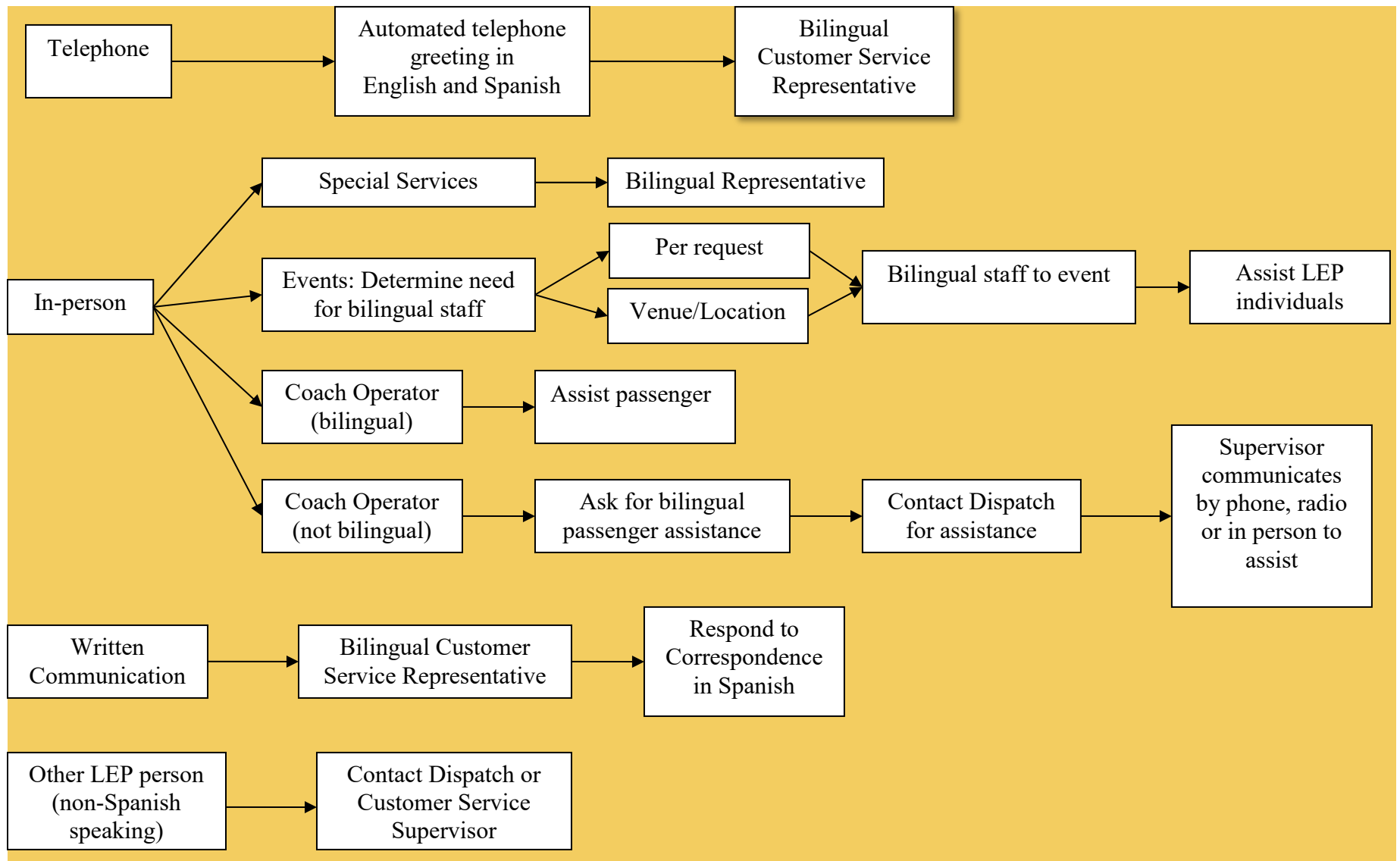
Teléfono: (520) 792-9222

Sun Tran

Customer Service
3920 N. Sun Tran Blvd.
Tucson, Arizona 85705

Appendix I:

Sun Tran— Flowchart for Responding to LEP persons



Appendix J:

Sun Van—Flowchart for Responding to LEP persons

