



MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION

2023 Title VI Report

December 2023

Contract No. 123110

Prepared in cooperation with the Massachusetts Department of Transportation and the U.S. Department of Transportation. The views and opinions of the Montachusett Regional Planning Commission expressed herein do not necessarily state or reflect those of the Massachusetts Department of Transportation or the U.S. Department of Transportation.

The Montachusett MPO and the MRPC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Montachusett MPO operates without regard to race, color, national origin, English Proficiency, ancestry, creed, income, gender, age and/or disability. Any person who believes him/herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the MRPC or the MMPO. Complaints are to be filed no later than 180 days from the date of the alleged discrimination. Please contact Glenn Eaton at 978-345-7376 ext. 310 for more information.

Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal “Title VI/Nondiscrimination” Protections

The Montachusett Regional Planning Commission (MRPC) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within MRPC’s Title VI Programs consistent with federal interpretation and administration. Additionally, MRPC provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

MRPC also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 §§ 92a, 98, 98a, prohibiting making any distinction, discrimination, or restriction in admission to or treatment in a place of public accommodation based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry. Likewise, MRPC complies with the Governor’s Executive Order 526, section 4 requiring all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran’s status (including Vietnam-era veterans), or background.

Additional Information

To request additional information regarding Title VI and related federal and state nondiscrimination obligations, please contact:

Montachusett Metropolitan Planning Organization (MMPO)
and Montachusett Regional Planning Commission (MRPC)
Title VI Coordinator
MRPC
464 Abbott Ave.
Leominster, MA 01453
(978) 345-7376
geaton@mrpc.org

Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct.

To file a complaint alleging a violation of the state’s Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000 ~ TTY: 617-994-6196

Language Assistance

English: If this information is needed in another language, please contact the MRPC Title VI Coordinator at 978-345-7376.

Spanish: Si necesita esta información en otro idioma, por favor contacte el coordinador del MRPC del Título VI al 978-345-7376.

French: Si cette information est nécessaire dans une autre langue, s’il vous plaît communiquer avec le coordonnateur MRPC Titre VI au 978-345-7376.

MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION SIGNATORIES

Massachusetts Department of Transportation (MassDOT) Secretary & CEO
MassDOT Highway Division Administrator
Montachusett Regional Planning Commission (MRPC) Chairman
Montachusett Regional Transit Authority (MART) Chairman/Mayor City of Gardner
Mayor City of Fitchburg
Mayor City of Leominster
Winchendon Board of Selectmen *Subregion 1*
Ashburnham Board of Selectmen *Subregion 2*
Lunenburg Board of Selectmen *Subregion 3*
Lancaster Board of Selectmen *Subregion 4*

Monica Tibbits-Nutt
Jonathan L. Gulliver
Laura Shifrin, Townsend
Mayor Michael J. Nicholson
Mayor Stephen DiNatale
Mayor Dean Mazzarella
Barbara Anderson
Rosemarie Meissner
Caesar Nuzzolo
Jason Allison

MPO SUB-SIGNATORY COMMITTEE MEMBERS

David Mohler, Director OTP, MassDOT, for Secretary & CEO Monica Tibbits-Nutt
Ann Sullivan, Assistant Project Development Engineer for Administrator Jonathan L. Gulliver
Glenn Eaton, Executive Director, MRPC, for Chairman Laura Shifrin
Bruno Fisher, Administrator, MART, for Chairman Mayor Michael J. Nicholson

EXOFFICIO MEMBERS

Joi Singh, Division Administrator
Peter Butler, Region 1 Administrator

Federal Highway Administration
Federal Transit Administration

MONTACHUSETT REGIONAL PLANNING COMMISSION (MRPC) OFFICERS

Laura Shifrin, Chairman
Roger Hoyt, Vice Chairman
Robert Swartz, Treasurer
Kristofer Munroe, Vice Treasurer
Kyle Nartowicz, Secretary

Townsend
Ashburnham
Gardner
Hubbardston
Royalston

MONTACHUSETT JOINT TRANSPORTATION COMMITTEE (MJTC) OFFICERS

Robert Swartz, Chairman
Travis Condon, Vice Chairman
Elizabeth Faxon, Secretary

Gardner
North Central MA Chamber of Commerce
Townsend

MONTACHUSETT REGIONAL PLANNING COMMISSION STAFF

Glenn Eaton, Executive Director
Holly Ford, Administrative & Human Resources Manager
Linda Quinlivan, Fiscal Director
Christopher McNamara, Fiscal Assistant
Brad Harris, Transportation Project Director
George Snow, Principal Transportation Planner
Sheri Bean, Senior Planner
Brian Doherty, AICP, Senior Planner
Tyler Godin, Principal Planner
Karen Chapman, Planning and Development Director
Jeffrey Legros, Senior Planner
Tracy Murphy, Senior Planner
Joseph Boyle, Principal Planner
Jonathan Vos, Regional Planner
Ryan Doherty, Regional Planner
Jason Stanton, GIS & IT Director
Kayla Kress, GIS & IT Analyst

MONTACHUSETT JOINT TRANSPORTATION COMMITTEE

COMMUNITY

APPOINTED BY SELECTMEN/MAYOR

APPOINTED BY PLANNING BOARD

Ashburnham
Ashby
Athol
Ayer
Clinton
Fitchburg
Gardner
Groton
Harvard
Hubbardston
Lancaster
Leominster
Lunenburg
Petersham
Phillipston
Royalston
Shirley
Sterling
Templeton
Townsend
Westminster
Winchendon

Randy Williams

Dick Kilhart
Shaun Copeland
Phil Duffy
Nicolas Erickson
Trevor Beauregard

Tim Kilhart
Travis Brown
Alexandra Turner
David DiGiovanni
Todd Dwyer
Nancy Allen
Gordon Robertson
Roland Hamel

Richard Maki
Tim Toth
Charles Sexton-Diranian

Brian Croteau

Rebecca Merrell
Elizabeth Wood

Paula Caron
Robert Swartz
Russell Burke
Stacia Donahue
Alice Livdahl
Roy Mirabito
Elizabeth Wood
Matthew Brenner

Janet Tice
Carl Corrinne
Charles Carroll II
Elizabeth Faxon
Marie Auger
Guy Corbosiero

EXOFFICIO MEMBERS

Derek Krevat	Office of Transportation Planning (OTP), Massachusetts Department of Transportation (MassDOT)
Jeffrey H. McEwen	Federal Highway Administration (FHWA), Administrator
Peter Butler	Federal Transit Administration (FTA), Acting Administrator
	Department of Environmental Protection (DEP)
Paula Simmons	MassDOT Highway Division - District 2
Ann Sullivan	MassDOT Highway Division - District 3
	Montachusett Regional Planning Commission (MRPC)
Bruno Fisher	Montachusett Regional Transit Authority (MART)

ORGANIZATION MEMBERS

Al Futterman	Nashua River Watershed Association (NRWA)
	Amalgamated Transit Union #690 (ATU 690)
Richard Liberatore	Fitchburg Airport Commission
Travis Condon	North Central MA Chamber of Commerce
Jennifer Brennan	Fitchburg Council on Aging
	Mass Development
Neil Angus/Beth Suedmeyer	Devens Enterprise Commission (DEC)
	Montachusett Opportunity Council, Inc.
David Kline	The ARC of Opportunity

Introduction

The following report is presented as the *FFY 2023 Title VI Annual Report* for the Montachusett Metropolitan Planning Organization (MPO). It has been prepared by the Montachusett Regional Planning Commission (MRPC) which acts as staff to the MPO.

In 2022, the MRPC received a guidance letter from the Massachusetts Department of Transportation (MassDOT) Office of Transportation Planning (OTP) that outlined current Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) interpretations related to Title VI regulations and reporting criteria. As such, this guidance letter detailed a work plan for the MPO to follow in order to address FHWA (*Section I. FHWA-Specific Reporting Requirements*) and FTA (*Section II. FTA-Specific Reporting Requirements*) requirements. A copy of the MassDOT Guidance letter to the MRPC is provided in Appendix 1 of this report. The sections of this report therefore follow the table in the MassDOT Guidance Letter in order to address all segments of the work plan for the Montachusett MPO. In August 2023, the MRPC received a comment letter regarding recommendations to the Title VI report. Those comments are provided in Appendix 3 and the report has been updated to reflect these recommendations.

I. Title VI Assurances

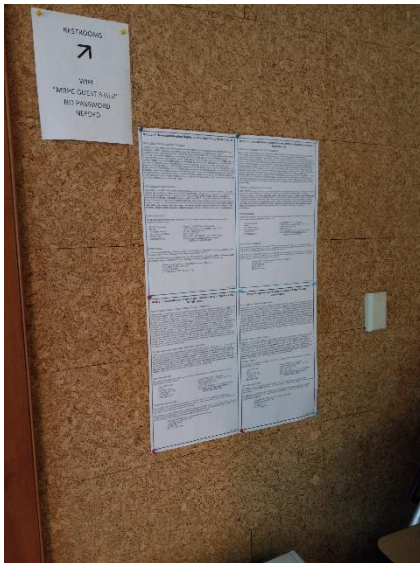
This document has been signed by Glenn Eaton, MRPC Executive Director and submitted to MassDOT on 1/19/23.

2. Certifications and Assurances

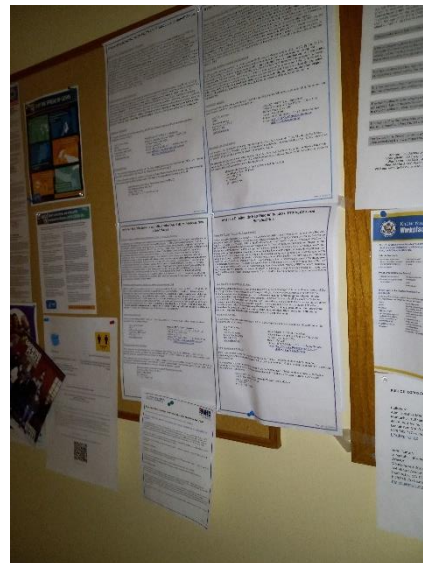
This document has been signed by Glenn Eaton, MRPC Executive Director and submitted to MassDOT on 1/19/23.

3. Title VI Notice

The MRPC website and existing Title VI notices have been updated to reflect current MRPC & MassDOT contact information. These notices are posted in two separate common/meeting spaces, including the main conference room and restroom hallway, within the MRPC offices.



MRPC Conference Room



MRPC Restrooms

4. Complaint Procedures

Current complaint procedures are updated and posted to the MRPC website. It is felt that the current complaint procedures are acceptable.

5. Complaint Form

Complaint forms have been updated based upon MassDOT guidance. Complaint Forms are available in the Region's three major languages according to the most updated Limited English Proficiency Plan (2022), English, Spanish, and French. In addition, copies of the forms and procedures are posted in the MRPC conference room.

6. Complaint Log

There have been zero complaints filed between 7/1/21 – 12/31/23.

7. Public Participation Plan

The MRPC is currently updating the 2017 Public Participation Plan (PPP). These updates will reflect changes that will align with MassDOTS updated PPP and will include virtual public and hybrid involvement. The current version can be found [here](#).

8. Language Assistance Plan

The Montachusett Limited English Proficiency Plan (LEP) was recently updated and endorsed by the MPO on February 15, 2023. This document contains an updated four-factor analysis and can be found on the MRPC website – https://www.mrpc.org/sites/g/files/vyhlf3491/f/uploads/mpo_endorsed_lep_2022_2_15_2023.pdf

9. Subrecipient Monitoring Process

The MRPC does not currently have any subrecipients at this time. If this occurs in the future, we will work with the MassDOT office of Diversity and Civil Rights to verify compliance with these procedures. We also have this stated in any and all contracts between MRPC & any subrecipients that they must follow our Title VI procedures and will be required to notify MRPC if there are any program issues or complaints regarding Title VI procedures and implementation.

10. Title VI Program Approval

All relevant documents as well as the website identify Glenn Eaton, Executive Director, as the MRPC staff responsible for Title VI coordination and compliance. See staffing organizational chart in Appendix 2. At the MPO meeting on 12/20/23, the MPO voted to approve the 2023 Title VI Report with updates.

11. Organization and Staffing

All relevant documents as well as the website identify Glenn Eaton, Executive Director, as the MRPC staff responsible for Title VI coordination and compliance. See staffing organizational chart in Appendix 2.

12. Program Review Procedures

Based on Title VI annual reporting compliance with MassDOT and continued interaction with the MassDOT Office of Transportation Planning, we are able to update current procedures and meet any requirements necessary. To do so, the Title VI coordinator is regularly involved during the annual review process and any complaints or issues are sent to the coordinator directly so that the appropriate steps can be taken according to the complaint.

13. Data Collection/Reporting/Analysis

MRPC staff continually collects demographic data from the US Census Bureau's 10-year census and the American Community Survey (ACS) 5-year estimates. The annual equity analysis done for the Transportation Improvement Plan (TIP) and Unified Planning Work Program (UPWP) requires the MRPC staff to update this information on a yearly basis. The UPWP also contains a Title VI task that relates to any and all relevant Title VI work. Additionally, the MRPC conducts target population surveys for various studies which could contribute or supplement our Title VI data analysis efforts. MRPC also solicits organizations and advocacy groups for various Title VI populations in order to enhance our outreach.

14. Title VI Training

During 2021 and 2022, staff did not engage in any Title VI or equity related training activities. Moving forward, MRPC will contact MDOT to set up a yearly training, at a minimum, for all MRPC staff, as well as encourage staff to participate in additional Title VI related trainings as they come up.

15. Dissemination of Title VI Information

The following appears on MJTC and MPO agendas that are emailed and posted to the MRPC website:

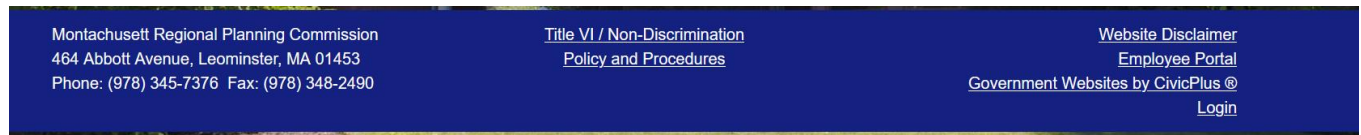
The Montachusett Metropolitan Planning Organization (MPO) and the MRPC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Montachusett MPO operates without regard to race, color, national origin, English Proficiency, ancestry, creed, income, gender, age and/or disability. Any person who believes him/herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the MRPC or the MMPO. Complaints are to be filed no later than 180 days from the date of the alleged discrimination. Please contact Glenn Eaton at 978-345-7376 ext. 310 for more information.

This location is accessible to people with disabilities. MRPC provides reasonable accommodations and/or language assistance free of charge upon request (including but not limited to interpreters in American Sign Language and languages other than English, open or closed captioning for videos, assistive listening devices and alternate material formats, such as audio tapes, Braille and large print), as available. For accommodation or language assistance, please contact MRPC by phone (978-345-7376), fax (978-348-2490) or by email bharris@mrpc.org. Requests should be made as soon as possible prior to the meeting, and for more difficult to arrange services including sign-language, CART or language translation or interpretation, requests should be made at least ten business days before the meeting. Anyone in need of translation services for any Montachusett MPO or MJTC meeting or document should contact the MRPC directly in advance in order to arrange applicable services. Please contact the MRPC at mrpc@mrpc.org or (978) 345-7376 ext. 300 with questions, concerns or assistance needs regarding accessibility and/or language services.

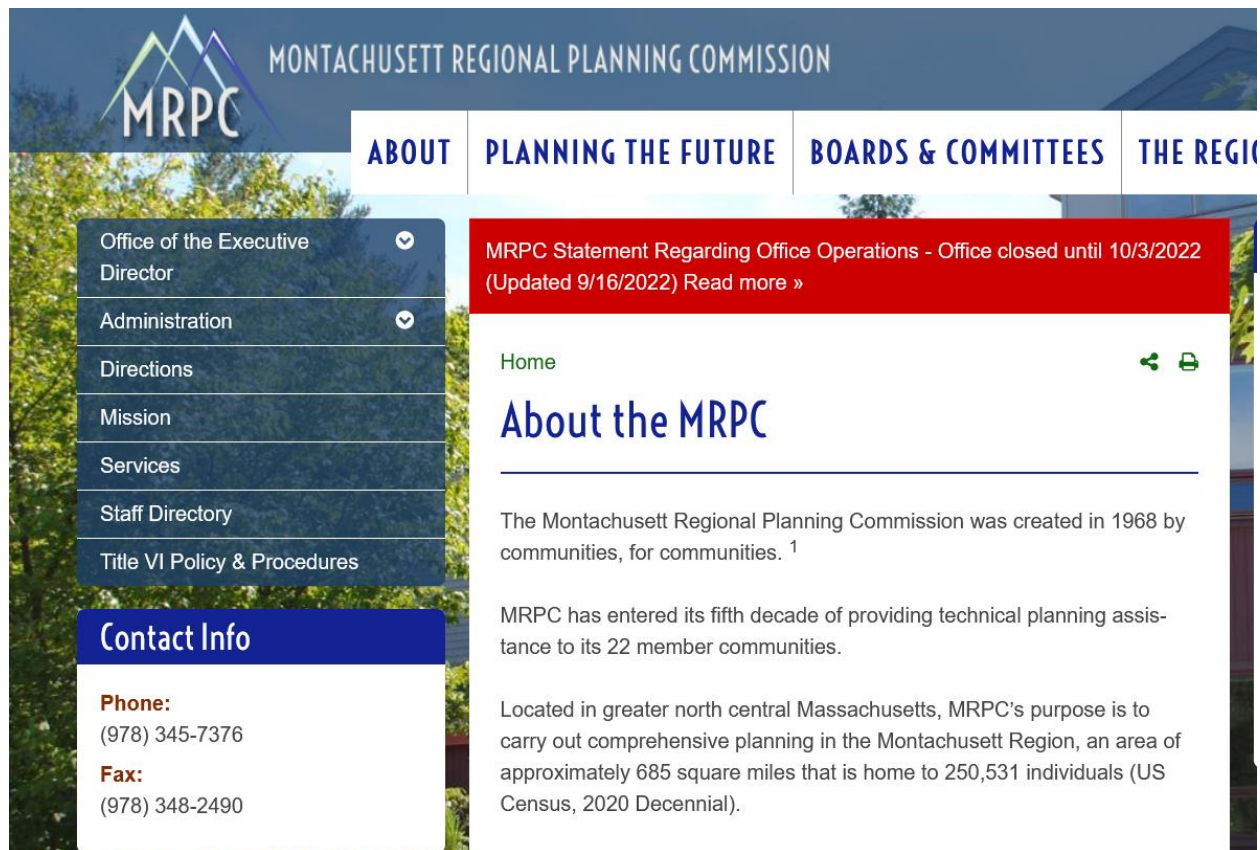
Cualquier persona en necesidad de servicios de traducción para cualquier reunión o MPO Montachusett documento pueden dirigirse a la MRPC directamente con antelación para organizar los servicios correspondientes.

Please note the MRPC offices are accessible via the Montachusett Regional Transit Authority (MART) fixed route service. For more information, please visit www.mrta.us

The following is from the MRPC website Homepage:



The **Title VI/Non-discrimination Policy & Procedures** notice highlighted above appears on each page of the MRPC website. In addition, a link is included under the “About MRPC” main menu item that appears at the top of each webpage within the site.



The following is from the MRPC website page specific to Title VI Policy and Procedures:

Title VI Policy and Procedures

2017 Title VI Annual Report for the Montachusett MPO (Sept 2017)

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Additional Information

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Montachusett Metropolitan Planning Organization (MMPO)
and Montachusett Regional Planning Commission (MRPC)

Title VI Coordinator

MRPC

464 Abbott Avenue
Leominster, MA 01453
(978) 345-7376

geaton@mrpc.org

MassDOT/MBTA Title VI Specialists

Office of Diversity and Civil Rights – Title VI Unit

10 Park Plaza, Suite 3800

Boston, MA 02116

Phone: (857) 368-8580 or 7-1-1 for Relay Service

Email: MASSDOT.CivilRights@state.ma.us

MBTAcivilrights@mbta.com

The webpage also provides links to copies of the Title VI Notice of Rights & Protections to Beneficiaries, Complaint Procedures and Complaint Forms in English, Spanish, French and Portuguese (as shown below).

Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct. See also the information and forms listed below.

To file a complaint alleging a violation of the state's Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000 ~ TTY: 617-994-6196

Translation

English: If this information is needed in another language, please contact the MRPC Title VI Coordinator at 978-345-7376.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador del MRPC del Título VI al 978-345-7376.

French: Si cette information est nécessaire dans une autre langue, s'il vous plaît communiquer avec le coordonnateur MRPC Titre VI au 978-345-7376.

Portuguese: Caso esta informação seja necessária em outro idioma, favor contar o Coordenador em Título VI do MRPC pelo telefone 978-345-7376.

Complaint Procedures, Forms and Other Information

Civil Rights Notice to the Public - *English* ([pdf](#))

Title VI Complaint Procedures - *English* ([pdf](#))

Title VI Complaint Form - *English* ([pdf](#))

Title VI Notice of Rights & Protection to Beneficiaries - *English* ([pdf](#))

Civil Rights Notice to the Public - *Spanish* ([pdf](#))

Title VI Complaint Procedures - *Spanish* ([pdf](#))

Title VI Complaint Form - *Spanish* ([pdf](#))

Title VI Notice of Rights & Protection to Beneficiaries - *Spanish* ([pdf](#))

Civil Rights Notice to the Public - *French* ([pdf](#))

Title VI Complaint Procedures - *French* ([pdf](#))

Title VI Complaint Form - *French* ([pdf](#))

Title VI Notice of Rights & Protection to Beneficiaries - *French* ([pdf](#))

Civil Rights Notice to the Public - *Portuguese* ([pdf](#))

Title VI Complaint Procedures - *Portuguese* ([pdf](#))

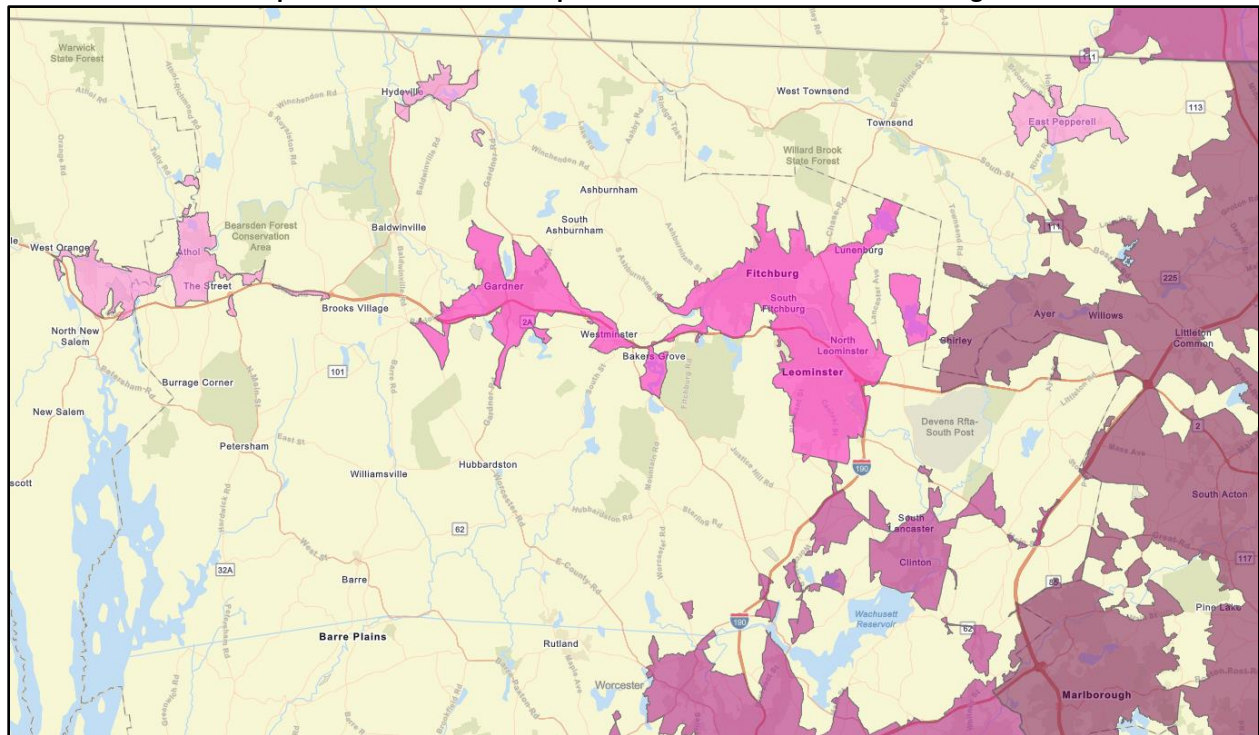
Title VI Complaint Form - *Portuguese* ([pdf](#))

Title VI Notice of Rights & Protection to Beneficiaries - *Portuguese* ([pdf](#))

16. Demographic Profile of Metropolitan Area

Based on information developed by FTA for the 2020 Census, five (5) metropolitan areas are contained in or encroach into the Montachusett region. They include the large Metropolitan Areas of Boston and Worcester, the smaller Fitchburg-Leominster Metropolitan area, and the Urban clusters of Athol and Winchendon. Please refer to the following map.

Map of FTA Identified Metropolitan Areas in the Montachusett Region



For planning purposes, the metropolitan populations commonly associated with Title VI, i.e., minority, low-income, elderly and disabled, are calculated for the community as a whole.

Table – Demographic Profile vs. Metropolitan Areas in the Montachusett Region

Community	FTA Metropolitan Area	Total Population	White Alone	Minority	Minority Percent	Below Poverty Level	Below Poverty Percent	Elderly	Elderly Percent	Disabled	Disabled Percent
Ashburnham		6,315	5,809	506	8.0%	435	7.0%	1,072	2.4%	573	9.1%
Ashby		3,189	2,995	194	6.1%	102	3.2%	630	19.8%	280	8.8%
Athol	Athol	11,922	10,632	1,290	10.8%	1,300	11.1%	2,340	19.6%	2,340	19.9%
Ayer	Boston	8,396	6,600	1,796	21.4%	486	5.9%	1,239	14.8%	926	11.1%
Clinton	Worcester	15,221	11,920	3,301	21.7%	762	5.0%	1,978	13.0%	1,692	11.1%
Fitchburg	Fitch/Leom	41,796	25,466	16,330	39.1%	5,838	14.6%	5,668	13.6%	6,519	15.8%
Gardner	Fitch/Leom	21,183	17,483	3,700	17.5%	2,812	14.1%	3,862	18.2%	2,877	14.4%
Groton	Boston	11,254	9,792	1,462	13.0%	424	3.8%	1,747	15.5%	729	6.5%
Harvard	Boston	6,829	5,294	1,535	22.5%	182	3.2%	1,056	15.5%	342	5.9%
Hubbardston		4,338	3,840	498	11.5%	246	5.7%	800	18.4%	371	8.6%
Lancaster	Worcester	8,428	6,890	1,538	18.2%	268	3.8%	1,460	17.3%	818	11.5%
Leominster	Fitch/Leom	43,478	30,101	13,377	30.8%	3,414	7.9%	7,691	17.7%	5,164	11.9%
Lunenburg	Fitch/Leom	11,627	10,174	1,453	12.5%	952	8.2%	1,855	16.0%	1,509	13.0%
Petersham		1,141	1,025	116	10.2%	49	4.5%	308	27.0%	118	10.3%
Phillipston		1,948	1,897	51	2.6%	103	5.3%	260	13.3%	214	11.0%
Royalston		1,461	1,443	18	1.2%	112	7.7%	277	19.0%	161	11.0%
Shirley	Boston	7,400	5,802	1,598	21.6%	248	4.2%	1,250	16.9%	816	13.7%
Sterling	Worcester	8,015	7,527	488	6.1%	142	1.8%	1,621	20.2%	821	10.4%
Templeton	Fitch/Leom	8,145	7,642	503	6.2%	334	4.1%	1,162	14.3%	769	9.5%
Townsend		9,144	8,059	1,085	11.9%	485	5.3%	1,392	15.2%	850	9.3%
Westminster	Fitch/Leom	8,148	7,942	206	2.5%	184	2.3%	1,775	21.8%	557	6.8%
Winchendon	Winchendon	10,371	9,039	1,332	12.8%	1,162	11.4%	1,632	15.7%	1,455	14.0%
Region Total		249,749	197,372	52,377	20.97%	20,040	8.02%	41,075	16.45%	29,901	11.97%

Table – Profile of Title VI Populations by Metropolitan Areas in the Montachusett Region

	FTA Metropolitan Area	Total Population	White Alone	Minority	Minority Percent	Below Poverty Level	Below Poverty Percent	Elderly	Elderly Percent	Disabled	Disabled Percent
Metropolitan Area Totals		222,213	172,304	49,909	22.46%	18,508	8.33%	36,336	16.35%	27,334	12.30%
	Large Metro Area (Boston/ Worcester)	65,543	53,825	11,718	17.88%	2,512	3.83%	10,351	15.79%	6,144	9.37%
	Small Metro Area (Fitchburg/Leominster)	134,377	98,808	35,569	26.47%	13,534	10.07%	22,013	16.38%	17,395	12.94%
	Urban Cluster (Athol/ Winchendon)	22,293	19,671	2,622	11.76%	2,462	11.04%	3,972	17.82%	3,795	17.02%

Limited English Proficiency (LEP) are discussed in more detail in the Montachusett Limited English Proficiency (LEP) Plan 2022 Update. The following table highlights how this population breakdowns across the Montachusett Region.

Table – Language Breakdown of Those Who Speak English Less Than Very Well (ELTVW)

Community	Total Population Over 5	Speaks English Less Than Very Well (ELTVW)	Spanish ELTVW	French, Haitian, or Cajun ELTVW	Chinese (incl. Mandarin, Cantonese) ELTVW	Other Indo-European languages ELTVW	Vietnamese ELTVW	All Other Languages ELTVW
Ashburnham	5,958	32	0	0	0	16	0	16
Ashby	3,140	0	0	0	0	0	0	0
Athol	11,324	191	112	54	17	4	4	0
Ayer	7,885	248	16	21	69	129	11	2
Clinton	14,301	1,272	852	0	53	239	11	117
Fitchburg	39,394	3,481	2,695	243	35	159	67	282
Gardner	20,064	624	374	69	0	18	9	154
Groton	10,746	127	5	18	23	55	18	8
Harvard	6,367	392	292	3	46	18	0	33
Hubbardston	4,044	30	30	0	0	0	0	0
Lancaster	8,073	279	197	18	10	41	0	13
Leominster	40,844	3,868	2,450	95	0	552	56	715
Lunenburg	11,044	352	95	52	0	95	0	110
Petersham	1,118	22	5	4	0	4	9	0
Phillipston	1,891	4	4	0	0	0	0	0
Royalston	1,374	0	0	0	0	0	0	0
Shirley	7,134	270	124	58	0	29	0	59
Sterling	7,653	95	0	0	18	77	0	0
Templeton	7,578	212	0	11	0	0	174	27
Townsend	8,706	149	23	0	16	54	36	20
Westminster	7,773	14	14	0	0	0	0	0
Winchendon	9,720	186	83	15	12	12	0	64
TOTALS	236,131	11,848	7,371	661	299	1,502	395	1,620
Percentage	-	5.02%	62.21%	5.58%	2.52%	12.68%	3.33%	13.67%

Source: 2021: ACS 5-Year Estimates Detailed Tables; Table ID: C16001 & 2022 Montachusett Draft LEP Update

17. Mobility Needs of Minority Populations

The Coordinated Public Transit–Human Services Transportation Plan (CPT-HSTP) (2018) documents the Montachusett Metropolitan Planning Organizations (MMPO) region’s unmet human-service transportation needs of individuals with disabilities, low-income individuals (or persons below the poverty level) and the elderly.

The CPT-HST Plan has been developed by the MMPO as a tool to help local transportation providers and communities improve transportation services, increase efficiency of service delivery, and expand outreach to meet growing needs. It provides a framework to guide the investment of existing transportation resources and the acquisition of future funds.

As such a resource, this plan:

- Evaluates community demographics related to the target populations
- Assesses the transportation gaps and needs of the target populations

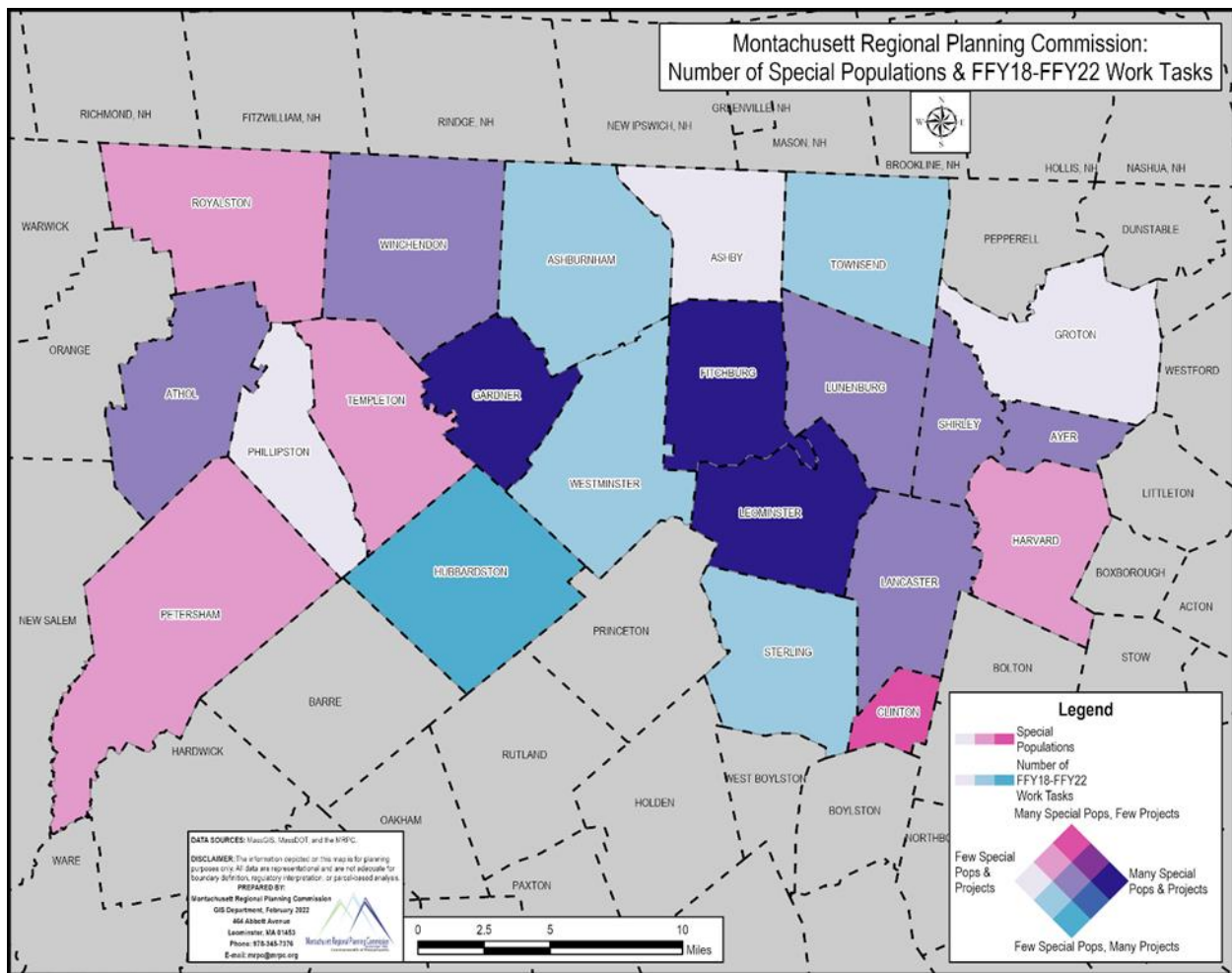
- Identifies strategies to address the gaps in transportation services
- Establishes relative priorities of the strategies

This document is in process of being reviewed internally and is expected to be endorsed in January 2024.

In addition to the CPT-HST report, the MRPC furthered our Title VI outreach efforts into our most recent 2024 Regional Transportation Plan (RTP) update where we partnered with our local Health Equity organization (CHNA 9) and did a large outreach effort to collect input for the RTP as well as regarding transportation/transit as a whole. This effort included community, regional and statewide organizations who have transportation needs or interests. This was a very successful event and has encouraged the two organizations (MRPC & CHNA9) to work closely together to form a UPWP task where the formation of a Transportation Management Association (TMA) will be examined and may lead to improved mobility options for various populations.

18. Demographic Maps and Charts of Funding Distribution

The following map is from the FFY 2023 UPWP and shows the geographic equity analysis that was also conducted based on the UPWP projects conducted over the past five years for those specific communities. The regionwide projects were left out of this analysis. The darker color shows where the most projects were conducted (5+) and the communities shown in white had no projects that were specific to that community over the past five years.



19. Analysis of MPO Transportation System Investments, Identifying and Addressing any Disparate Impacts

The following information is from the equity analysis conducted for the FFY 2023-2027 Montachusett TIP.

FFY 2023-2027 Target Eligible Projects

To assess the possible benefits or burdens of the projects within the FFY 2023-2027 TIP, those projects identified as federal aid target eligible were identified. The analysis for this TIP is limited to these projects as they are the projects with the most programming control of the MPO. Bridge projects as well as those on the Interstate system, etc., are prioritized at the state level.

The following table identifies 18 target eligible projects in the Montachusett Region, listed by their calculated TEC score as well as their anticipated FFY year listing for this TIP. Some of the projects are identified as being listed in the Appendix of the TIP. The Appendix is a listing of projects without an identified funding source or program year due to design status and/or fiscal constraint issues.

FFY 2023-2027 Target Eligible Projects

TIP Year	MassDOT ID #	Community	Description	TEC	Est Cost FFY 2021 Dollars
2024-25'	604499	Leominster	Leominster- Resurfacing and Related Work on Rt 12 (Central St)	38	\$13,283,024
	612242	Fitchburg	Reconstruction of John Fitch Highway	37	\$9,174,115
2023	607432	Westminster	Westminster - Rehabilitation & Box Widening on Rt 140, From Patricia Rd to the Princeton T.L.	33	\$6,375,205
2026-27'	609213	Harvard	Harvard- Resurfacing and Box Widening on Ayer Road, from Route 2 to the Ayer Town Line	32	\$10,136,843
2027	610681	Clinton	Clinton- Reconstruction of Sterling Street (Route 62), from Willow/Lawrence Street to Main Street	31	\$4,715,060
2027	608415	Athol	Athol- Intersection Improvements at Route 2A and Brookside Road	30	\$1,544,720
	606640	Ayer	Ayer- Resurfacing & Related Work on Rt 2A (Fitchburg Rd & Park St)	25	\$2,400,000
2023	609279	Gardner	Gardner- Roundabout Construction at Elm Street, Pearl Street, Central Street and Green Street	25	\$2,571,433
2025	609244	Ashburnham	Ashburnham- Roadway Rehabilitation on Rt 101	25	\$8,556,417
2023	608784	Templeton	Templeton- Roundabout Construction at The Intersection of Patriots Road, South Main Street, North Main Street and Gardner Road	25	\$2,037,795
	609227	Ayer	Ayer- Roadway Rehabilitation on Route 2A/111 (Park Street and Main Street)	23	\$4,800,000
	608832	Lancaster	Lancaster- Interchange Improvements at Route 2 Exit 34 (Old Union Turnpike)	23	\$6,060,800
	608177	Ashby	Ashby - Reconstruction of Route 119 (Townsend Road) from Bernhardt Road to Route 31.	21	\$6,727,500
2026	608424	Templeton	Templeton- Reconstruction of Route 68, From King Phillip Trail (Route 202) North to the Phillipston Town Line (2.65 Miles)	18	\$6,063,291
	608879	Winchendon	Winchendon- Resurfacing & Related Work on Maple Street (Route 202), From Vine Street to Glenallen Street (1.36 Miles)	15	\$1,680,444
	607604	Sterling/West Boylston	Sterling/West Boylston - Improvements on Route 140 at I-190	14	\$3,647,110
	611989	Athol	Athol - Sidewalk Installation along Templeton Road (Route 2A) 0.9 mi	23	\$2,590,300
	612612	Sterling	Sterling - Intersection Improvements at Route 140 and Route 62	TBD	\$3,117,500

FFY 2023-2027 Target Eligible Projects Equity Analysis

An analysis of the geographic distribution of the nine projects within the 2023-2027 TIP resulted in an understanding of the percentage of TIP projects and TIP funds allocated within Environmental Justice and Title VI geographic areas. The results of this analysis are as follows:

- The total regional population was determined, along with the population of each identified Environmental Justice and Title IV group (Row 1), from which the percentage of total population was determined for each group (Row 2).
- Of the 9 projects analyzed based on EJ and Title VI identified populations, a dollar amount which was programmed within each geographic area was determined (Row 3). It was then determined what percent of total funds were spent within each group (Row 4)
- Row 5 displays the comparison of the percentage of total population to the percentage of funding spent.

FFY 2023-2027 TIP Target Eligible Projects Equity Analysis Summary

		Total Regional Population	EJ Block Groups			FTA Title VI Block Groups		FHWA Title VI Block Groups		FHWA Title VI Census Tracts		
			Income**	Minority	LEP HH*	Minority	Low Income**	Elderly	Minority	Disabilities	Foreign Born	Language***
1	Population	244,482	22,232	29,624	2,501	29,624	22,232	37,775	29,624	28,827	21,200	36,236
2	Percent of Total Regional Population	100%	9.09%	12.12%	1.02%	12.12%	9.09%	15.45%	12.12%	11.79%	8.67%	14.82%
3	Total Cost of TIP Projects	\$55,283,788	\$19,542,804	\$1,544,720	\$0	\$17,399,177	\$22,114,237	\$46,986,213	\$17,399,177	\$19,542,804	\$29,679,647	\$17,998,084
4	Percent of Regional Cost of Projects	100%	35.35%	2.79%	0.00%	31.47%	40.00%	84.99%	31.47%	35.35%	53.69%	32.56%
5	Difference in % Cost and % Population	0.00%	26.26%	-9.32%	-1.02%	19.36%	30.01%	69.54%	19.36%	23.56%	45.01%	17.57%

* Percentage of Total Montachusett Region Households (91,878)

** Percentage of Poverty determined Montachusett Population (235,956)

*** Percentage of Montachusett Region Total Population Five Years and Older (230,739)

- An examination of Row 5 shows the majority of identified groups benefit disproportionately in these investments when compared to their overall regional population.
- There were two groups who saw less total percentage cost than percentage population, they are
 - The EJ population of Limited English Proficiency (LEP) per Household, in which there is only one such Block Group regionwide
 - The EJ population of Minority, which saw only a difference in investments compared to population (-9.32%). It should be noted that according to FTA Title VI block groups for minority populations, investments far outweigh the percentage of population (+19.36%).

2018-2022 Projects Five Year Lookback

The following table identifies 15 projects for the Montachusett Region implemented in the last five years, i.e. from FFY 2018 to FFY 2022. All projects appeared in a prior TIP and were advertised for construction, initiated construction or completed construction prior to the development of this (current) TIP.

FFY 2018-2022 TIP Five Year Look Back Projects

TIP Year	MassDOT ID #	Community	Description	Est Cost
2018	608188	Gardner/ Leominster/ Sterling	Intersection Improvements at 3 Locations	\$2,622,497
2018	606124	Fitchburg/ Lunenburg/ Leominster	Reconstruction of Summer Street and North Street	\$9,939,131
2019	608728	Winchendon	Resurfacing & Related Work on Route 202, From the Templeton Town Line to Main Street (3.1 Miles)	\$1,795,875
2019	604961	Clinton	Resurfacing & Related Work on Route 110 (High Street)	\$3,153,674
2019	607848	Hubbardston	Resurfacing & Related Work on Route 68, From Williamsville Road to the Gardner C.L.	\$4,190,296
2019	607446	Westminster	Intersection Improvements, Route 2A at Route 140	\$2,139,574
2020	605651	Leominster	Reconstruction on Route 13, From Hawes Street to Prospect Street	\$5,994,626
2020	607902	Ayer	Reclamation & Related Work on Route 2A, From Harvard Road to Main Street	\$3,837,875
2021	607431	Westminster	Westminster - Resurfacing & Related Work on Route 140, From Route 2A to Patricia Road	\$1,668,791
2021	608548	Winchendon	Winchendon- Improvements & Related work on Central Street (Route 202), from Front Street to Maple Street (0.5 Miles)	\$4,900,253
2021	608657	Lunenburg	Lunenburg- Bridge rehabilitation, L-17-009, Route 2A over Pearl Hill Brook	\$1,755,772
2021	608888	Gardner	Gardner- Reclamation and related work on Pearson Boulevard	\$1,264,648
2021	608891	Gardner	Gardner- Resurfacing and rumble strip installation on Route 140	\$1,791,202
2022	608779	Lancaster	Lancaster- Intersection Improvements on Route 117/Route 70 at Lunenburg Road and Route 117/Route 70 at Main Street	\$5,747,806
2022	608793	Hubbardston	Hubbardston- Highway Reconstruction of Route 68 (Main Street), from 1,000 ft North of Williamsville Road to Elm Street	\$5,241,283

2018-2022 Projects Five Year Lookback Equity Analysis

An examination of projects funded over the last five TIPs, identified 15 individual projects with an estimated total cost of \$56,043,303. As with the current Target Projects, a geographic distribution of these 15 projects against those areas categorized as Environmental Justice (EJ) or Title VI areas resulted in the following:

- The total regional population was determined, along with the population of each identified Environmental Justice and Title IV group (Row 1), from which the percentage of total population was determined for each group (Row 2).
- Of the 15 projects analyzed based on EJ and Title VI identified populations, a dollar amount which was spent within each geographic area was determined (Row 3). It was then determined what percent of total funds were spent within each group (Row 4)
- Row 5 displays the comparison of the percentage of total population to the percentage of funding spent.

FFY 2018-2022 TIP Five Year Look Back Projects Equity Analysis Summary

		Total Regional Population	EJ Block Groups			FTA Title VI Block Groups		FHWA Title VI Block Groups		FHWA Title VI Census Tracts		
			Income **	Minority	LEP HH*	Minority	Low Income**	Elderly	Minority	Disabilities	Foreign Born	Language***
1	Population	244,482	22,232	29,624	2,501	29,624	22,232	37,775	29,624	28,827	21,200	36,236
2	Percent of Total Regional Population	100%	9.09%	12.12%	1.02%	12.12%	9.09%	15.45%	12.12%	11.79%	8.67%	14.82%
3	Total Cost of TIP Projects	\$56,043,303	\$8,787,398	\$20,347,456	\$0	\$32,239,258	\$16,212,350	\$44,309,326	\$32,239,258	\$15,357,874	\$31,295,609	\$27,457,734
4	Percent of Regional Cost of Projects	100%	15.68%	36.31%	0.00%	57.53%	28.93%	79.06%	57.53%	27.40%	55.84%	48.99%
5	Difference in % Cost and % Population	0.00%	6.59%	24.19%	-2.83%	45.41%	18.94%	63.61%	45.41%	15.61%	47.17%	34.00%

* Percentage of Total Montachusett Region Households (91,878)

** Percentage of Poverty determined Montachusett Population (235,956)

*** Percentage of Montachusett Region Total Population Five Years and Older (230,739)

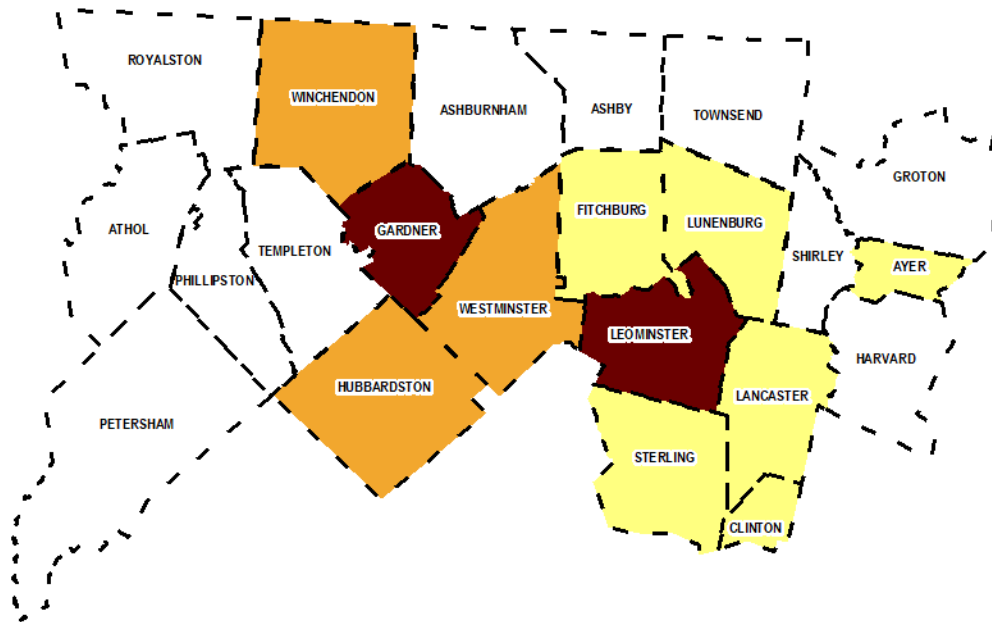
- An examination of Row 5 shows the majority of identified groups benefit disproportionately in these investments when compared to their overall regional population.
- There was one group who saw less total percentage cost than percentage population:
 - The EJ population of Limited English Proficiency (LEP) per Household, in which there is only one such Block Group regionwide

Summary of Equity Analysis

The percentage of TIP funds that have been allocated in Environmental Justice and FHWA or FTA areas is greater than the percentage of the region's population that reside in those areas. Overall, it can be determined that the projects implemented through the TIP process in the past five years have benefitted the Environmental Justice and Title VI populations in an equitable manner. Such analysis will be conducted on a yearly basis to ensure that the Environmental Justice and Title VI populations continue to benefit from the transportation planning process in the Montachusett Region.

Summary of Community Distribution

The map below shows the geographic equity analysis that was also conducted based on the projects conducted over the past five years for those specific communities. This map corresponds with the five-year lookback table on the previous page. The darker color shows where the most projects were conducted, and the communities shown in white had no projects that were specific to that community over the past five years (2018 – 2022).



Number of Projects	
	3
	2
	1

Based upon this analysis and review, it would appear that the Montachusett MPO is making an effort to address transportation planning issues in Title VI and EJ communities in the Region. Projects compiled in the last five years have been developed in an attempt to locate them in communities which either have an Environmental Justice population, FHWA Title VI population, FTA Title VI population, or a combination of all three. Future efforts should focus on the communities in which no funding has been spent in the recent past. Efforts will be made to continue to monitor such trends and encourage communities, especially those which have not been taking advantage of TIP funds, to engage in the process and develop projects for inclusion.

Appendix 1 – FFY 2022 Title VI Guidance Letter



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



Glenn Eaton
464 Abbott Avenue, Leominster, MA 01453

8/2/2022

Re: Annual Title VI Reporting Requirements

The Massachusetts Department of Transportation (MassDOT), as a direct recipient of federal financial assistance through the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), is required to demonstrate compliance with Title VI of the Civil Rights Act of 1964 (Title VI). This includes monitoring subrecipients of federal financial assistance – or those organizations to which MassDOT passes through FHWA and FTA dollars. Among MassDOT's subrecipients are the Metropolitan Planning Organizations (MPOs) and Regional Planning Agencies (RPAs) that perform regional transportation planning activities across the Commonwealth.

One primary mechanism for monitoring MPO/RPA compliance with Title VI obligations is through recurring reporting provided by each region to MassDOT. This correspondence is intended to detail this year's Title VI reporting requirements. In general, these annual reporting requirements can be characterized in one of two ways – targeted reporting requirements or the submission of a comprehensive Title VI plan. For several of the most recent annual reporting cycles, MassDOT has requested the MPOs/RPAs to provide targeted reports, where each region was instructed to focus on particular compliance improvements. For this reporting cycle, MassDOT is requesting a comprehensive Title VI plan submission from each region.

By ensuring that each planning region has an up-to-date Title VI plan, MassDOT has the opportunity to confirm that all Title VI compliance requirements are being met. In addition, this allows each planning region the opportunity to consider and implement process improvements and other enhancements to their Title VI activities and helps facilitate federal certification reviews by ensuring these activities are properly documented and ready to share with federal partners when needed.

The following table identifies all of the required components for this year's annual Title VI reporting. Please be prepared to submit a responsive Title VI plan by December 31, 2022. Note that the table indicates whether individual Title VI plan components satisfy an FHWA compliance requirement, and FTA compliance requirement, or both. There are also important notes regarding certain reporting elements, to help facilitate preparing the requested submission. If there are concerns about the timing of the due date, please contact MassDOT's Office of Transportation Planning at the contact info provided below.

Lastly, it is important to emphasize that meeting these reporting requirements does not necessitate developing all new content. If an MPO/RPA believes that their existing Title VI plan components are up to date, please feel free to submit them as they are.

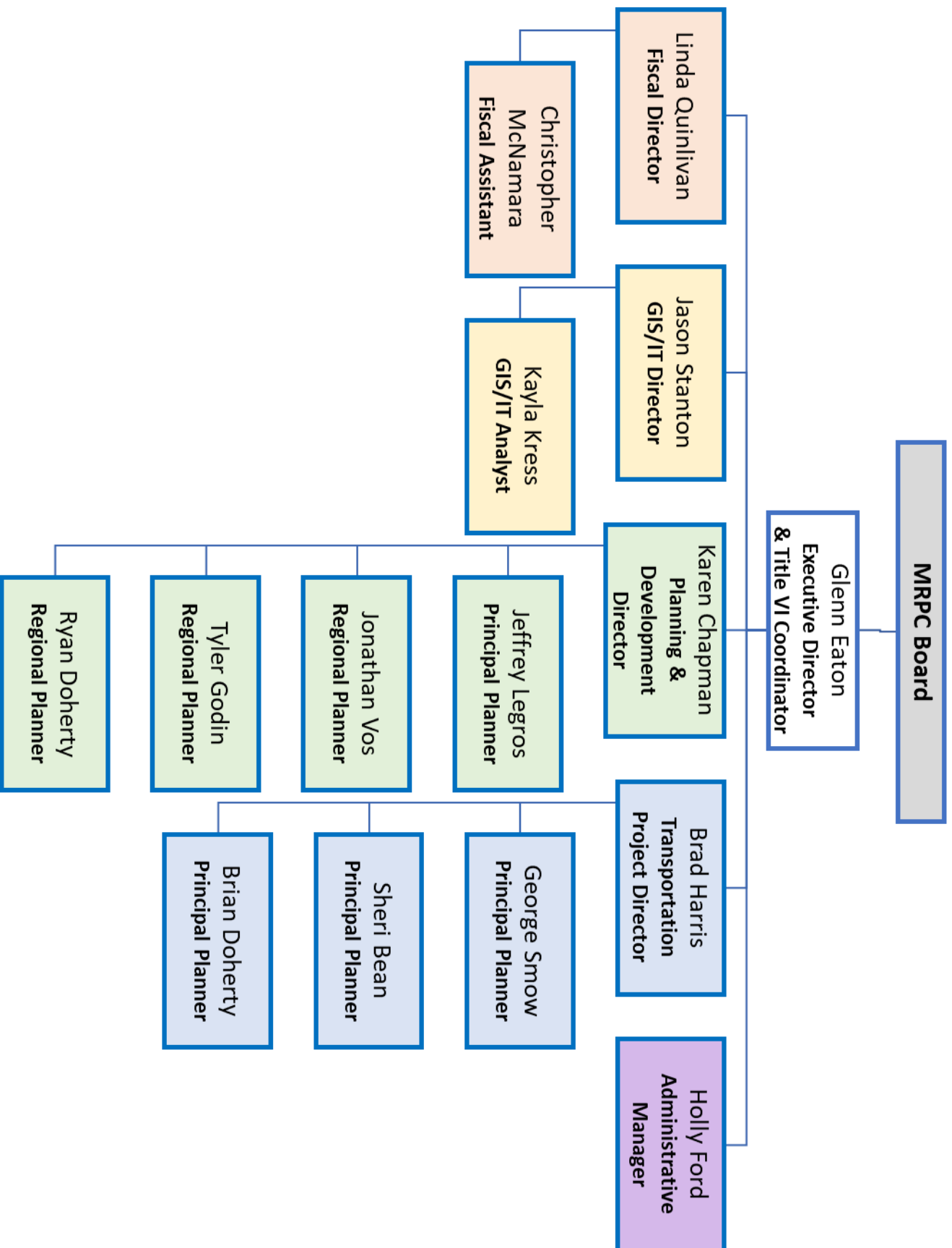
For questions or technical assistance, please contact: Raissah Kouame, Regional Planning Coordinator, MassDOT Office of Transportation Planning, raissah.a.kouame@dot.state.ma.us.

Title VI Plan Components and Annual Report Content	FHWA Requirement	FTA Requirement
Title VI Assurances <i>Note: Attached is a copy of MassDOT's Title VI Assurances document. Please sign on the subrecipient signature page and submit to MassDOT.</i>	X	
Certifications and Assurances <i>Note: The latest version can be downloaded here. Please sign and submit to MassDOT.</i>		X
Title VI Notice <i>Note: MassDOT has developed an updated Title VI Notice, which is attached. This can be used as a template for the MPO/RPA Notice. Please make sure that the Notice you submit lists the MPO/RPA as a point of contact for receiving Title VI related inquiries and complaints. MassDOT is also providing translated versions of this document to facilitate language access requirements. Translated versions will be provided when they are available from the translation vendor. Please indicate how you plan on disseminating this document.</i>	X	X
Complaint Procedures <i>Note: MassDOT has developed updated Title VI Complaint Procedures, which are attached. This can be used as a template for the MPO/RPA procedures. MassDOT is also providing translated versions of this document to facilitate language access requirements. Translated versions will be provided when they are available from the translation vendor. Please indicate how you plan on disseminating the document.</i>	X	X
Complaint Form <i>Note: MassDOT has developed an updated Title VI Complaint Form, which is attached. This can be used as a template for the MPO/RPA form. MassDOT is also providing translated versions of this document to facilitate language access requirements. Please indicate how you plan on disseminating the document.</i>	X	X
Complaint Log <i>Note: Please provide a log of Title VI related complaints over a one-year lookback period (since July 2021).</i>	X	X
Public Participation Plan <i>Note: MassDOT is working on developing a new Public Participation Plan that will be made available, when complete, to all MPOs/RPAs. This new Plan will capture details regarding MassDOT's approach to virtual, hybrid, and in-person public engagement. For this reporting cycle, please provide a copy of your current Public Participation Plan and an indication of the anticipated schedule and strategy for any upcoming updates to the existing plan.</i>	X	X
Language Assistance Plan <i>Note: Please make sure that the Four-Factor Analysis in your current Language Assistance Plan is up to date.</i>	X	X

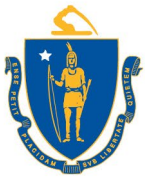
Subrecipient Monitoring Process <i>Note: For those MPOs/RPAs that pass through federal financial assistance to additional subrecipients, please specify how those subrecipients are monitored for Title VI compliance.</i>	X	X
Title VI Program Approval <i>Note: Please provide documentation showing the appropriate MPO/RPA official responsible for policy decisions reviewed and approved the Title VI Plan submission. According to each region's bylaws, the appropriate entity could be the Executive Director, the Chair of the Board, or the Board itself.</i>		X
Organization and Staffing <i>Note: Please identify the MPOs/RPAs Title VI Coordinator and an organizational chart that should demonstrate their ready access to the head of the agency.</i>	X	
Program Review Procedures <i>Note: Please describe how the Title VI Coordinator confirms that Title VI compliance requirements are being met by the MPO/RPA.</i>	X	
Data Collection/Reporting/Analysis <i>Note: Please briefly describe how the MPO/RPA collects, utilizes, and analyzes Title VI related data, such as population demographics.</i>	X	X
Title VI Training <i>Note: Please identify and describe any Title VI related trainings that MPO/RPA staff have participated in during the last year (since July 2021).</i>	X	X
Dissemination of Title VI Information <i>Note: Please describe, and provide some examples, of how Title VI related documentation and information is shared with the public.</i>	X	X
Demographic Profile of Metropolitan Area <i>Note: This should include identification of the locations of minority populations in the aggregate. In addition to minority populations, the MPO/RPA can also identify low-income and limited English proficient populations as well as the concentration of individuals with disabilities.</i>		X
Mobility Needs of Minority Populations <i>Note: Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.</i>		X
Demographic Maps and Charts of Funding Distribution <i>Note: Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient. Please analyze the investments from the current TIP and current UPWP.</i>		X

<p>Analysis of MPO Transportation System Investments, Identifying and Addressing any Disparate Impacts</p> <p><i>Note: The following map shows the geographic equity analysis that was also conducted based on the projects conducted over the past five years for those specific communities. The regionwide projects were left out of this analysis. The darker color shows where the most projects were conducted (5+) and the communities shown in white had no projects that were specific to that community over the past five years.</i></p>		X
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Appendix 2 – Montachusett Regional Planning Commission Staffing Organization Chart



Appendix 3 – Montachusett Regional Planning Commission Title VI Review Report by MassDOT



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Gina Fiandaca, Secretary & CEO



August 29, 2023

Montachusett Regional Planning Commission
Attn: Brad Harris
464 Abbott Avenue
Leominster, MA 01453

Dear Mr. Harris,

The Office of Diversity and Civil Rights (ODCR) has reviewed Montachusett Regional Planning Commission's (MRPC) most recent Title VI submission. Below you will find our comments – a mix of recognizing those elements of the report that are compliant, some commendations for strong points, required follow-ups for the next reporting cycle, and recommendations for longer term updates.

In a slight variation from previous reporting cycles, rather than requiring a new report we are treating the upcoming reporting cycle as an opportunity for the regions to complete any required follow up from this recent submission. MRPC should submit a revised plan addressing the required follow-ups by December 31, 2023. Recommendations are provided when ODCR is not expecting an update to the requirement by the December 31, 2023 deadline.

1. Title VI Assurances
Substantially meets the requirements
2. Title VI Certifications and Assurances
Substantially meets the requirements
3. Title VI Notice to the Public
Required Follow-Up (due December 31, 2023) – The Title VI Notice references MassDOT/MBTA, the notice should be updated to reference MRPC, including adding contact information for the public to contact and/or file complaints directly to MRPC.
4. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
Required Follow-Up (due December 31, 2023) – The updated template is included in the submission, but references MassDOT/MBTA. These procedures should be updated to demonstrate that this is the process followed by MRPC. Once updated, the website should be updated to include the most current complaint procedures, including translated versions.
5. Title VI Complaint Form
Substantially meets the requirements
6. List of Title VI investigations, complaints, and lawsuits
Substantially meets the requirements
7. Public Participation Plan (PPP), including information about outreach methods to engage minority and limited English proficient populations (LEP).
Substantially meets the requirements
Commendation – MRPC provides a concise outline for the development of planning documents, including opportunities for public input.

8. Language Assistance Plan (LAP) for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
Recommendation (can be addressed once LAP is finalized) – MRPC mentions that an update to the LAP is underway, the submission should be updated to include a copy of MRPC’s Language Assistance Plan.
9. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI.
Required Follow-Up (due December 31, 2023) - MRPC reports there were no active subrecipients during the reporting cycle. The submission should be updated to include a monitoring process that would be followed to ensure subrecipient compliance with Title VI requirements (i.e. program adoption, implementation, monitoring, etc.).
10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.
Required Follow-Up (due December 31, 2023) – MRPC needs to include documentation demonstrating approval of the current Title VI Program.
11. An organizational chart identifying the MPOs/RPAs Title VI Coordinator and demonstrating ready access to the head of the agency.
Substantially meets the requirements
12. Description of how the Title VI coordinator confirms that Title VI compliance requirements are being met by the MPO/RPA.
Required Follow-Up (due December 31, 2023) – MRPC should update the submission to include details on how the Title VI coordinator monitors implementation activities to ensure compliance with Title VI requirements.
13. Describe how the MPO/RPA collects, utilizes, and analyzes Title VI related data, such as population demographics.
Recommendation (Ongoing) – Throughout the program, MRPC discusses how it uses ACS and census data particularly for collecting population demographics. MassDOT suggests identifying additional data sources to supplement census and ACS data.
14. Identify and describe any Title VI related trainings that MPO/RPA staff have participated in during the last year (since July 2021).
Recommendation (Ongoing) – MassDOT suggests MRPC identify and encourage staff to participate in civil rights related trainings for the upcoming reporting cycle. MassDOT Title VI staff is available to provide training, including language access and Title VI training.
15. Description and examples of how Title VI related documentation and information is shared with the public.
Substantially meets the requirements
16. Provide a demographic profile of the metropolitan areas, including the identification of minority populations in the aggregate. In addition to minority populations, the MPO/RPA can also identify low-income and limited English proficient populations as well as the concentration of individuals with disabilities.
Substantially meets the requirements

17. Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

Required Follow-Up (due December 31, 2023) – In addressing this requirement, MRPC mentions an update to its Coordinated Public Transit – Human Services Transportation Plan is underway. This plan typically addresses mobility needs for elderly and disabled populations. MRPC should update this submission to provide details on how it identifies and addresses the needed of minority populations.

ODCR would like to call special attention to the last two requirements (#18 and #19). MPOs employed several different strategies for conducting these analyses. To provide you with the most productive guidance, ODCR has not commented on the specific approach taken to address these requirements. Instead, ODCR is researching how MPOs across the country approach these requirements and will share any findings on approaches that may be relevant to our MPO partners.

18. Provide demographic maps and charts analyzing the impacts of the distribution of state and federal funds in the aggregate for public transportation purposes.
19. Provide an analysis of MPO transportation system investments, identifying and addressing any disparate impacts.

Please direct any questions or concerns on the follow-ups or submission deadlines to your MPO liaison Chris Klem at christopher.j.klem@state.ma.us. We appreciate your cooperation and demonstrated commitment to Title VI compliance.

Sincerely,

Tiffany Garcia

Tiffany Garcia
Senior Title VI Specialist