



Timothy W. Brennan, Executive Director

December 31, 2018

RE: Pioneer Valley MPO Annual Reporting of Title VI Activities

Gregory Sobczynski
Title VI Specialist
MassDOT - Office of Diversity and Civil Rights
10 Park Plaza, Suite 3800, Boston, MA 02116

Dear Mr. Sobczynski:

The Pioneer Valley Planning Commission (as staff to the PVMPO) is providing the Office of Diversity and Civil Rights with this update on the MPO's Title VI activities as a sub-recipient of MassDOT receiving transportation related federal financial assistance. In response to ODCR's correspondence dated August 13th 2018, the PVPC transportation planning staff has acted on recommendations in the FFY 2018 work plan and is providing documentation of this work to satisfy the MPO's Title VI annual reporting requirements for this cycle.

This annual report and the responses to these recommendations are not meant to be inclusive of every Title VI activity undertaken by PVPC staff on behalf of the MPO. Should you have any questions, please contact, Gary Roux Transportation Program Manager at gmroux@PVPC.ORG or 413-781-6045 (ext. 308)

Pioneer Valley MPO Title VI Recommendation

(As per August 13, 2017 correspondence)

I. Language Access

Recommendation II-1: The MPO/RPA should clarify the nature of the "no-shows" related to providing language services (interpreters or members of the public that had requested support) and the frequency with which this happens. Also, please consider any patterns in this behavior. For instance, if the no-show phenomenon is occurring among hired interpreters, is this attributable to a particular firm? If "no-shows" are occurring among members of the public that had requested language support, is this attributable to the membership of particular organizations?

Response: PVPC has gone to great lengths to assure that public meetings are welcoming and accessible everyone. This effort includes selecting meeting locations that are transit accessible as well as accessible to people with disabilities. In addition, PVPC offers to provide reasonable accommodations and/or language assistance free of charge upon request including 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. This information is included in every public meeting notice and mentioned at meetings by the Chair. For accommodation or language assistance the public is asked to contact PVPC by phone, fax, TTD/TTY or by email. PVPC asks that requests be made as soon as possible prior to the meeting and that requests for more difficult to arrange services including sign language, CART or language translation or interpretation be made at least ten business days before the meeting. The “no-shows” referenced in this recommendation (II-1) refer to members of the public that made a request and then did not show up at the meeting or failed to inform staff that they would not be in attendance. This is unfortunate as staff expend a great deal of time to coordinate with professional interpreters and maintain a professional relationship with the organizations that provide these valuable services. For meetings of a longer duration, more than one interpreter may be needed. While our contracts allow the interpreter to leave the meeting if the individual requesting the service does not show up, a minimum fee and travel expenses are incurred. There are of course always exceptions and unforeseen circumstances that cannot be anticipated. In the future it may be necessary for the MPO to adopt policies and procedures that limit the occurrence of “no-shows.” In the 2018 reporting cycle we are fortunate to report that there were no “no-shows.”

II. Equity Analyses

Recommendation III-2: Please describe the details of a possible equity analysis methodology that makes use of TEC project scores as a comparison across demographics. MassDOT recognizes that such an analysis could be limited to comparing average project scores across the region’s communities or it could be expanded to compare not only project scores but also the outcome of projects over time. For example, if TEC scoring indicates that a project is anticipated to have a significant impact on congestion, pedestrian safety, accessibility, job access, or other such variables, the MPO/RPA could compare changes to those conditions over time to determine if the project had the anticipated effect.

Response: In response to ODCR’s comments on the TEC project scores, PVPC staff conducted an “in-depth” review of the new TEC scoring and how a proposed TIP project ranking was impacted by community, type of project and average points awarded by each category, or in some cases not impacted. Staff also compared scores and project ranking by urban, suburban and rural demographic populations. A summary of this analysis is included as “**Attachment A**” to this Title VI annual report. What we found is

that some communities with “EJ” and affected “Title VI” populations were not taking full advantage of all the TEC points that could be allocated to their project. For instance the new TEC allocates scoring points for project that have a Health Impact Assessment (HIA) that demonstrates a positive outcome for the project. A HIA is a valuable tool for optimizing the outcome for a project yet no communities currently take advantage of this resource. In the future PVPC will work with the MPO to better define scoring for this category.

Note: PVPC supports the opportunity for a peer exchange among the Commonwealth’s MPO/RPAs to identify best practices and innovations regarding equity analyses.

III. Equity Impacts on MPO Activities

Recommendation IV-2: Please describe the results of the effort of the MPO/RPA to better inform decisions with an equity perspective through the use of the MaPIT and GeoDOT platforms.

Response: PVPC is now actively engaged in the use of MaPIT and GeoDOT platforms for transportation planning and coordination in our all of our program activities. PVPC staff completed the MassDOT training and offers assistance to communities submit upon request. The MPO now uses GeoDot when interacting with communities submitting Project Need Forms and Project Initiation Forms. In addition PVPC staff use MaPIT and GeoDOT when exchanging information for the review of MassDOT planning documents including the Massachusetts Statewide Freight Plan, and the Massachusetts Bicycle Plan. PVPC has reached out to MassDOT GIS/Data staff to offer additional data layers from our regional GIS databased that could provide additional resources for the state and local communities to access via these platforms.

IV. Public Engagement

Recommendation V-2: The MPO/RPA could consider offering some support and resources to these partner organizations as they address succession planning and onboarding of new staff. For instance, the MPO/RPA could provide these organizations with a brochure or other backgrounding documents detailing the role of the MPO/RPA and the history of the partnership with the advocacy organization. These materials could be provided to new advocates as they come on board, thus limiting the amount of time needed to bring new staff up to speed.

Response: PVPC has created an “introductory” memo as a template for introducing new staff and created a new pamphlet/brochure for the Pioneer Valley Regional Transportation Plan (**Attachment B**). PVPC also routinely offers to meet with newly elected officials, new hires, and representatives to introduce them to the planning process as services we provide.

V. Training

Recommendation VI-1: Please provide details regarding the unconscious bias training described in the FFY 2017 Title VI report. MassDOT would like to know what

organization provided this training to determine if it can be made available to additional subrecipients.

Response: PVPC contracted for services and training through our previous employee assistance program EforHealth.com (800-227-2195). Unfortunately, the agency has since switched EAP providers and no longer has a contact. PVPC has since started using Mass-4-YOU for EAP services. In 2018 the agency adopted a policy requiring all staff to participate in sexual harassment prevention training and also offered a popular voluntary workshop on sexual harassment prevention training that provided additional information on how to respond to sexual harassment, as well as to situations and comments that don't rise to the level of harassment but create a negative climate. Information on the EAP provider is included as "**Attachment C**"

VI. Transit Funding Distribution Analysis

Recommendation VIII-1: Please consider the feasibility and describe the methodology to expand the functionality of the online map tool to facilitate an analysis of transit investment equity, either through the geographic distribution of projects, the per capita expenditures across diverse populations, and/or other relevant variables (such as those identified above in Section III).

Response: PVPC continues to work with the MPO and the Pioneer Valley Transit Authority to identify methodologies to assess the geographic distribution and equity of transit investments. Working with PVRTA in 2018, an effort was made to develop questions to better identify the income of student populations through transit surveys. Data from PVRTA's on-board surveys inform decisions about marketing, route adjustments, and schedule planning. Recently, this data was used to assess service changes for equity analysis. The new income questions will be implemented in system-wide surveys in 2019.

Recommendation VIII-2: If some transit investments are difficult to geo-locate for mapping analysis purposes, please consider and report on what other manifestations of the transit system and its operation could be mapped and analyzed vis-à-vis Title VI communities with currently available data. If additional data is needed, please identify. For example, analyzing bus assignments provides an opportunity to determine if Title VI communities are receiving older, traditional fuel, vehicles with fewer amenities at a comparable rate to non-Title VI communities. Similarly, new alternative fuel vehicles are often limited in where they can realistically and reliably operate (especially in the instance of electric buses being impractical for remote hilly locales within the service area). An analysis of the distribution of new vehicle investments could indicate that certain communities are more likely to see the use of new alternative fuel vehicles than others. If this is the case, is there any correlation with Title VI communities?

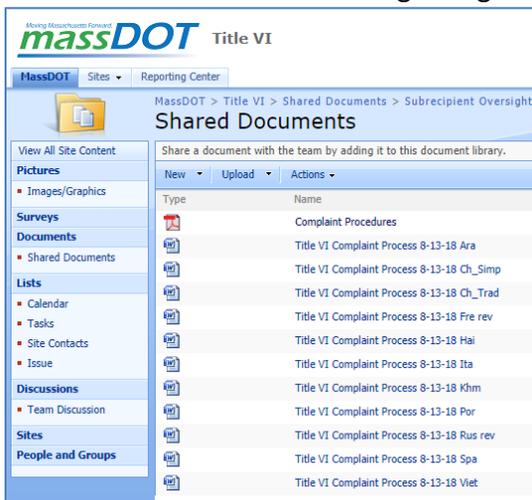
Response: PVPC continues to map transit investments with TIP projects. We also research alternatives for evaluating the distribution of transit resources. Many of the most significant “system-wide” investments continue to occur in locations with high proportions of Title VI protected populations. As an example, in 2019 the final phasing of PVRTA’s major operations and maintenance facility for fixed route transit service will transition to Cottage Street in Springfield. Originally, there was concern that as this facility moved from one low income neighborhood to another, residents would be impacted by the loss of jobs. PVRTA offset this impact by relocating their demand response paratransit vehicle maintenance to the Main Street facility and prevented a critical loss of jobs while minimized the impact of the transition.

VII. MPO Determined Focus Areas

Additional Reporting Requirements:

1. **Complaint Procedures:** MassDOT has updated and translated (into the top ten languages in the Commonwealth) the Title VI Complaint Procedures document. These procedures are designed to instruct recipients and subrecipients of federal transportation dollars on how to process allegations of discrimination made by members of the public. The revisions reflect recent guidance from FHWA regarding delegation of authority to recipients and subrecipients to conduct Title VI investigations. In addition, in creating these updated procedures, MassDOT’s Title VI staff worked closely with the agency’s Manager of Investigations in order to simplify the content for ease of understanding among members of the public. These revised complaint procedures are in use by MassDOT and as such have been reviewed and approved by FHWA and FTA. In addition, they have been professionally translated. Please download the documents from the MassDOT Title VI SharePoint page (<https://services.eot.state.ma.us/cr>) and document their dissemination.

Response: PVPC staff has downloaded the revised “Complaint Procedures” along with the language translations and these materials are being added to the new MPO web site that will be launched at the beginning of 2019.



2. **“Engage” Contact Data:** MassDOT continues to refine the “Engage” suite of Title VI and ADA related public engagement tools on the GeoDOT platform. Recent upgrades to the database for contact information requires the attention of MPO/RPA staff to ensure that data housed in the platform is up to date and includes all relevant attributes. Please consider the following list of needed updates as part of your ongoing efforts to keep this content relevant. For this reporting cycle, it is particularly important that MassDOT receive updated data in the fields of “Service Area,” “Public Organization,” and “Category/Subcategory.” For a full list of organization and contact attributes, please consider the tables below.

Response: PVPC staff has continued to resource contacts and partner organization to refine the “Engage” database contact. In coordination with ODCR new listings for 2018 will be added to the “Engage” suite using the aforementioned fields. A sample is included with this annual report as **“Attachment D.”**

Sincerely,



Gary M. Roux
Principal Planner

Attachments: A) Transportation Evaluation Scoring Criteria Assessment
B) Pioneer Valley Regional Transportation Plan brochure
C) Employee Assistance Program
D) Engage Contact Suite Fields

cc: Timothy Brennan
Dana Roscoe
Bryan Pounds
Jeffrey McCollough