



Charlie Baker, Governor
Karyn Polito, Lt. Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

March 20, 2017

Mr. Andrew Vorce Executive Director
Nantucket Planning & Economic Development Commission
2 Fairgrounds Road
Nantucket, MA 02554

Dear Mr. Vorce:

For several reporting cycles, MassDOT has followed FHWA's approach to Title VI reporting for subrecipients, namely a triennial cycle for comprehensive program submissions. For FFY2017, FHWA reinterpreted Title VI regulations and eliminated the triennial program development reporting approach in favor of a more streamlined annual update submission. The report elements detailed below, in Section I, mirror this new approach. FTA's annual reporting remains unchanged from previous cycles and the tasks in Section II reach those transit-specific requirements.

As Highway and Transit Title VI requirements have not changed, much of this new reporting paradigm is consistent with past practice. MassDOT encourages regional innovation in Title VI activities and as such, Section III below should be used to develop goals and strategies to focus on specific components of Title VI work that will strengthen the MPO's engagement with stakeholders, response to local communities, and improvement of organizational effectiveness. You are encouraged to use this section to set the goals and priorities that make the most sense for your organizational and regional needs.

MassDOT Title VI staff will conduct site visits to each MPO in May and June 2017. These meetings will provide an opportunity to discuss this work plan in more detail and MassDOT staff will share log in credentials for the "Engage" outreach tool and provide any necessary technical assistance for staff to begin using the platform.

Looking ahead, MassDOT's Office of Transportation Planning and Office of Diversity and Civil Rights are developing improved Title VI GIS data layers, including age, sex, disability, and race/ethnicity, aiming to advance equity analyses from project distribution to a more nuanced understanding of the impacts of transportation related activities on individuals and communities. These GIS layers will be shared with MPOs when complete. These layers will not be available for the 2018-2022 TIP development cycle, but will be useful for future TIPs, UPWPs, and your upcoming Regional Transportation Plan.

MPO Title VI Reports for FFY2017 are due by September 30, 2017. Please see the following pages for guidance.

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

- i. Notice: Document the dissemination of the Notice to Beneficiaries. This can include a narrative and photographs documenting electronic (website, email blast, email footer, radio and television media, etc.) and hardcopy (posting in public offices, posting at public meetings, brochures, etc.) notices.
- ii. Language Access: Please identify the financial cost and resources that were expended in the past year to provide language and/or disability related accommodations (translation services, interpreters, alternate document format production, etc.). Resources include staff time, direct expenses, etc.
- iii. Equity Analyses: Reflect on the quality and accuracy of the equity analyses performed on the FFY2017 UPWP and FFY2017-2021 TIP to determine if regional needs are effectively captured or if there are areas for improvement.
 1. Are there regional/community equity concerns that you know of that are not effectively reflected in the current analytical approach?
 - Ex: particular demographic clusters not present in the data; contextual or anecdotal information about community needs that are not easily identified through demographic data.
 2. Can you suggest equity analysis methodology improvements to capture or document those equity considerations more effectively?
- iv. Equity Impacts on MPO Activities: Have equity considerations impacted a project score, work task, or programming decision in your region in the FFY2017-2021 and FFY2018-2022 TIPs and UPWPs?
 1. Based on these observations, are there recommendations for improvement as to how equity and context specific considerations are incorporated into these decisions?
 2. How are community needs and priorities incorporated into or reflected within these decisions?

b. External Compliance Assessment

- i. Public Engagement: Has the MPO's participation with partner organizations (such as involvement with a local task force or community event) better connected Title VI and equity principles with the MPO's transportation related activities? Have community relations led to new and/or diversified constituent involvement?
 1. What factors do you think led to the success of these engagements and relationships? What factors do you see as contributing to barriers to success? How does the MPO plan to continue building upon established successes and encountered challenges?
- ii. Public Engagement: What efforts did the MPO engage in to meet and forge relationships with constituencies that previously were not effectively being reached? Were planning materials presented in forums besides MPO, Joint Transportation Committee, or public hearing type meetings?

- c. Internal and External Title VI Capacity Building
 - i. Training: Did staff or leadership participate in any Title VI and/or equity related trainings?
- d. Addressing Allegations of Discrimination
 - i. Complaints: MassDOT has updated and translated a discrimination complaint form. The form is approved by FHWA and FTA is available for MPO use (download from SharePoint at <https://services.eot.state.ma.us/cr>). Please review these materials and document their incorporation into MPO protocols. Document the dissemination of the complaint forms. If the MPO chooses to continue using a different complaint form, please provide an updated copy for MassDOT review and approval.
 - ii. Identification of Responsible Staff: Check for consistency in identification of Title VI Coordinator and/or Specialist across relevant documents and communication materials.
- e. Special Emphasis Area
 - i. Public Engagement: Following MassDOT Title VI staff onsite visit in May/June 2017, transition outreach databases to Engage Tool database.

II. FTA-Specific Reporting Requirements

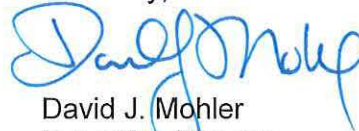
- a. Funding Distribution Analysis: Please provide a map(s) depicting the locations of transit related investments (both federal and state dollars) in the current TIP. The base layer(s) should show percent minority and percent low-income, by Census tract.
 - i. Please include a description of the methodology used to determine the geographic location of transit investments. For instance, how is the MPO representing service-area wide transit investments? What about investments that are not conducive to mapping?

III. MPO Determined Focus Areas

- a. What goals does the MPO have for FFY2018 to increase capacity and effectiveness in Title VI work?
- b. Are there outstanding questions or challenges the MPO faces regarding Title VI?
- c. Anything else you want to share?

If you have any questions or comments on this guidance please contact Nikki Tishler at Nicole.Tishler@state.ma.us.

Sincerely,



David J. Mohler
Executive Director,
Office of Transportation Planning