



Commonwealth of Massachusetts
Office of the State Auditor
Suzanne M. Bump

Making government work better

Official Audit Report – Issued February 27, 2020

Massachusetts Emergency Management Agency

For the period July 1, 2016 through December 31, 2018





Commonwealth of Massachusetts
Office of the State Auditor
Suzanne M. Bump

Making government work better

February 27, 2020

Ms. Samantha Phillips, Director
Massachusetts Emergency Management Agency
400 Worcester Road
Framingham, MA 01702-5399

Dear Ms. Phillips:

I am pleased to provide this performance audit of the Massachusetts Emergency Management Agency. This report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, July 1, 2016 through December 31, 2018. My audit staff discussed the contents of this report with management of the agency, whose comments are reflected in this report.

I would also like to express my appreciation to the Massachusetts Emergency Management Agency for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMB", written over a light blue circular background.

Suzanne M. Bump
Auditor of the Commonwealth

cc: Thomas Turco III, Secretary, Executive Office of Public Safety and Security

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
OVERVIEW OF AUDITED ENTITY	2
AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY	7
DETAILED AUDIT FINDINGS WITH AUDITEE’S RESPONSE.....	10
1. The Massachusetts Emergency Management Agency did not meet all its responsibilities under the Emergency Planning and Community Right-to-Know Act.	10
a. MEMA did not establish emergency planning committees for all cities and towns with businesses storing hazardous chemicals that are subject to reporting under the Emergency Planning and Community Right-to-Know Act.	10
b. MEMA could not demonstrate that it received and reviewed each LEPC’s/REPC’s emergency response plan.	12
APPENDIX	16

LIST OF ABBREVIATIONS

EO	executive order
EPA	United States Environmental Protection Agency
EPC	emergency planning committee
EPCRA	Emergency Planning and Community Right-to-Know Act
LEPC	local emergency planning committee
MEMA	Massachusetts Emergency Management Agency
REPC	regional emergency planning committee
SERC	state emergency response commission
USC	United States Code

EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Massachusetts Emergency Management Agency (MEMA) for the period July 1, 2016 through December 31, 2018. In this performance audit, we determined whether MEMA met all of its responsibilities under the federal Emergency Planning and Community Right-to-Know Act (EPCRA) (Chapter 116 of Title 42 of the United States Code) and other applicable authoritative guidance.

Below is a summary of our findings and recommendations, with links to each page listed.

Finding 1a Page 10	MEMA did not establish emergency planning committees (EPCs) for all cities and towns with businesses storing hazardous chemicals that are subject to reporting under EPCRA.
Finding 1b Page 12	MEMA could not demonstrate that it received and reviewed each local or regional emergency planning committee's emergency response plan.
Recommendations Page 13	<ol style="list-style-type: none">1. MEMA should identify where EPCs should be established and should establish them.2. MEMA should establish policies and procedures for reviewing emergency response plans and retaining documentation to substantiate this review.

OVERVIEW OF AUDITED ENTITY

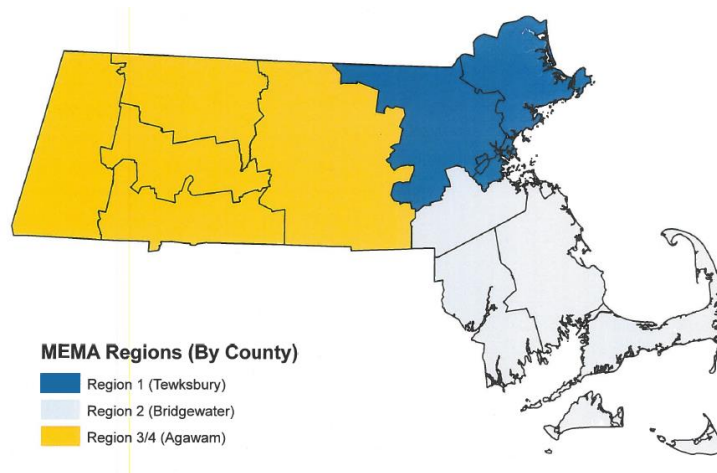
The Massachusetts Emergency Management Agency (MEMA) was established under the Massachusetts Civil Defense Act, Chapter 639 of the Acts of 1950. Section 18 of Chapter 6A of the Massachusetts General Laws placed MEMA within the Executive Office of Public Safety and Security. According to its website, MEMA “is the state agency charged with ensuring the state is prepared to withstand, respond to, and recover from all types of emergencies and disasters.”

MEMA’s operations are funded through a state appropriation that is supplemented by grants from the Federal Emergency Management Agency.

MEMA Fiscal Year Revenue Summary

	2017	2018	2019
State Appropriations	\$ 1,502,000	\$ 1,664,000	\$ 1,720,000
Federal Grants	77,770,000	25,171,000	60,925,000
Total	<u>\$ 79,272,000</u>	<u>\$ 26,835,000</u>	<u>\$ 62,645,000</u>

MEMA’s director is appointed by the Governor. During our audit period, MEMA had approximately 80 full-time-equivalent employees and 12 to 15 contract employees who provided training to local stakeholders as needed. To facilitate emergency response, MEMA has developed four regions across the state to encompass all cities/towns in the Commonwealth, as indicated in the map below. MEMA’s Region 1 office is in Tewksbury, its Region 2 office is in Bridgewater, and its Region 3 and Region 4 offices are in Agawam.



Emergency Planning and Community Right-to-Know Act

According to a fact sheet titled “The Emergency Planning and Community Right-to-Know Act” from the United States Environmental Protection Agency (EPA), in 1986, because of escalating concerns regarding “local preparedness for chemical emergencies and the availability of information on hazardous chemicals” in facilities throughout the United States, EPA worked with Congress to enact the Emergency Planning and Community Right-to-Know Act (EPCRA). EPCRA was created to help state and local communities and Native American populations plan for chemical emergencies. It also requires businesses to periodically report to the federal, state, and local governments information on their storage and use of hazardous substances, which these governments are supposed to use to protect their communities from potential chemical hazards.

According to EPA’s fact sheet “How to Better Prepare Your Community for a Chemical Emergency—A Guide for State, Tribal and Local Agencies,”

The purpose of EPCRA is to:

- *Encourage and support emergency planning efforts at the state, tribal and local levels*
- *Provide local governments and first responders with information concerning potential chemical hazards present in their planning district*
- *Prevent, prepare for, and mitigate the effects of a chemical incident, and*
- *Provide the public with information on chemical risks in their community and information on what to do if a chemical accident occurs.*

Chapter 116(11001) of Title 42 of the United States Code (USC) requires the governor of each state to appoint a state emergency response commission (SERC). The SERC is responsible for implementing EPCRA within the state. This responsibility includes the following:

- establishing procedures for receiving and processing public requests for information collected under EPCRA
- establishing local emergency planning districts
- appointing a local emergency planning committee (LEPC) for each district
- reviewing local emergency response plans for each LEPC
- supervising the activities of LEPCs

On May 27, 1987, the Governor issued Executive Order (EO) 276, designating the Massachusetts Civil Defense Agency and Office of Emergency Preparedness as the lead agency for emergency notification, planning, and training. EO 276 was revoked on January 23, 1996 by EO 383. On May 3, 1996, the Governor designated MEMA as the SERC in Massachusetts in a memorandum:

I hereby appoint the Massachusetts Emergency Management Agency (MEMA) to be the federally required emergency response commission in Massachusetts. As the state agency with expertise in emergency response, MEMA shall have the authority and responsibility to implement the Emergency Planning and Community Right-to-Know Act of 1986, and shall exercise any and all authority delegated to it as a state emergency response commission consistent with the federal law.

MEMA has established a 26-member commission (called the Massachusetts State Emergency Response Commission) to facilitate EPCRA compliance. The members are the MEMA director, who serves as chair; 1 nominated member from each of eight Massachusetts agencies (the Fire Chiefs Association, Department of Fire Services, Department of Environmental Protection, Department of Public Health, Association of Hazardous Materials Technicians, Department of Transportation, State Police, and Chiefs of Police Association); 1 nominated member from an environmental organization; 5 voting members appointed by the chair; and 11 nonvoting members appointed by the chair.

According to the commission's bylaws, its duties include the following:

- 1. Coordinating SARA [Superfund Amendments and Reauthorization Act of 1986] Title III training, education, technical assistance and outreach activities;*
- 2. Appointing and coordinating local and regional emergency planning committees for each district, and reviewing local and regional emergency plans;*
- 3. Establishing procedures and a system for receiving and processing emergency release reporting, other required information and inventories from covered facilities, and requests from governmental officials or the public for information, including the designation of an official to serve as coordinator for information;*
- 4. Increasing state and local emergency response capabilities.*

Emergency Planning Committees

As noted earlier, the designated state SERC is responsible for establishing emergency planning committees (EPCs) and appointing members to each EPC. However, in Massachusetts, each city or town chooses either to establish an EPC as a single community, in which case the EPC is designated by MEMA

as an LEPC, or to establish one as part of a group of communities, in which case the EPC is designated as a regional emergency planning committee (REPC). As of the end of our audit period, of the 351 cities and towns in the Commonwealth, 294 had voluntarily organized into 70 LEPCs and 24 REPCs ([Appendix](#)), and 57 were not associated with LEPCs or REPCs (Finding [1a](#)).

In 1997, the 26-member commission initiated a voluntary Emergency Planning Committee Certification Program. According to the program's application form, the program created a process for LEPCs and REPCs to "ensure all EPCs are moving towards meeting the goals and missions of EPCRA." Certification is also used to establish eligibility for LEPCs and REPCs to receive federal hazardous material emergency planning grant funds that are distributed by MEMA. As of October 2018, there were 49 LEPCs and 15 REPCs participating in the certification program. According to MEMA, of these participants, 31 LEPCs and 11 REPCs had achieved EPCRA compliance.

Tier II Reporting

Tier II or "Community Right to Know" reporting is a requirement, set forth in 42 USC 116(11022), that businesses give information to government agencies and the public about what hazardous materials¹ are used or stored at the businesses' facilities. Any facility that has certain hazardous materials above a threshold established by EPA at any time during the calendar year is required to submit a Tier II report, by March 1 of the next calendar year, to the SERC, the LEPC or REPC, and the local fire department. Information in Tier II reports includes the type of hazardous material, the state it is in (solid, liquid, or gas), the quantity stored, its location at the facility, and contact information for the facility's designated emergency point of contact. The intent of this reporting requirement is to provide the community with information on what chemicals are present. Tier II reporting also provides government agencies with information about facilities so emergency personnel can respond and make informed decisions. Tier II reporting is a federal obligation imposed by EPA, but reporting is done at the state and local levels.

MEMA has purchased an online reporting system, the Tier II Manager System, that businesses can use to report inventories of hazardous materials that are subject to reporting under EPCRA, as described above. Access to the Tier II Manager System is managed by MEMA personnel. Information collected in

1. The Environmental Protection Agency defines hazardous materials as substances that may present physical hazards. Information and procedures for handling and working with hazardous materials are maintained on detailed information sheets called Material Safety Data Sheets. Chemical manufacturers provide these sheets to purchasers of hazardous chemicals. More than 500,000 products have such sheets.

the Tier II Manager System can be accessed by first responders throughout the Commonwealth. There were 4,277 Tier II reports filed by Massachusetts businesses for calendar year 2018.

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Massachusetts Emergency Management Agency (MEMA) for the period July 1, 2016 through December 31, 2018.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Below is our audit objective, indicating the question we intended our audit to answer, the conclusion we reached regarding the objective, and where the objective is discussed in the audit findings.

Objective	Conclusion
1. Is MEMA, as the state emergency response commission (SERC), meeting its responsibilities under the federal Emergency Planning and Community Right-to-Know Act (EPCRA) at the state level?	No; see Findings 1a and 1b

To achieve our objective, we gained an understanding of MEMA's internal control environment as it related to our audit objective by reviewing applicable laws and agency policies and procedures and conducting inquiries with management regarding the administration of the SERC under EPCRA. We evaluated the controls MEMA used to remind Tier II report filers of upcoming annual reporting deadlines.

We also performed the following procedures.

- To determine whether MEMA, as the Massachusetts SERC, established procedures for receiving and processing public requests for information collected under EPCRA, we selected a random nonstatistical sample of 4 public information requests from a population of 10 received during the audit period. We reviewed the date of the request, details of the request, date of the response, and details of the response for each of the 4 requests in our sample.
- To determine whether MEMA had designated EPCRA-compliant districts, we obtained a list of 70 local emergency planning committees (LEPCs) and 24 regional emergency planning committees (REPCs) that existed as of December 2018. From the list, we identified the cities and

towns that were associated with each LEPC or REPC. We compared the results to a list of all 351 cities and towns in Massachusetts.

- We obtained from MEMA a list of 4,277 facilities in the Commonwealth that had filed Tier II reports in calendar year 2018. To determine whether there were any facilities that were subject to EPCRA reporting and were not included in an LEPC or REPC, we sorted the list by city or town and compared the results to the list of cities and towns that were not associated with LEPCs or REPCs.
- To determine whether MEMA had adequately performed its required responsibilities under EPCRA regarding the supervision of emergency planning committees (EPCs), we reviewed Chapter 116 of Title 42 of the United States Code to identify attributes within the law that would clarify a SERC's responsibilities that were required in order to supervise an EPC. We determined that to comply with EPCRA, a SERC should perform the following duties:
 - establish an EPC and appoint its members
 - maintain a copy of the EPC's emergency response plan
 - ensure the following for the EPC's emergency response plan:
 - that it is reviewed annually by the EPC
 - that it designates a community response coordinator
 - that it identifies all Tier II facilities within the EPC's district
 - that it includes each facility's plans to respond to chemical releases
 - that it identifies a facility emergency coordinator for each facility in the EPC's district
- Using the list of 351 communities in Massachusetts, we randomly selected a nonstatistical sample of 40 communities. We requested the emergency response plans for these 40 communities and evaluated whether MEMA performed its responsibilities as SERC.

Data Reliability Assessment

To verify the accuracy and completeness of the list of EPCRA-related public record requests that MEMA received during our audit period, we obtained from MEMA's SERC coordinator a list of such requests received during our audit period and traced 4 of the 10 requests to a file maintained by MEMA's public records administrator. We then traced 4 EPCRA-related public record requests received by MEMA's public records administrator to the list we received from the SERC coordinator.

To verify the accuracy and completeness of the list of 4,277 Tier II reports filed for calendar year 2018, we scanned the list for duplicate records and reports filed outside the audit period.

To verify the accuracy and completeness of the list of Massachusetts communities that we obtained from the Massachusetts Bureau of Geographic Information, we compared it to the records on the Secretary of the Commonwealth's website.

We determined that the list of EPCRA-related public record requests, the list of Tier II reports from the Tier II Manager System, and the list of communities in the Commonwealth were sufficiently reliable for the purposes of our audit.

Where sampling was used, we used nonstatistical samples; therefore, we could not project the results of our tests to the entire population.

DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

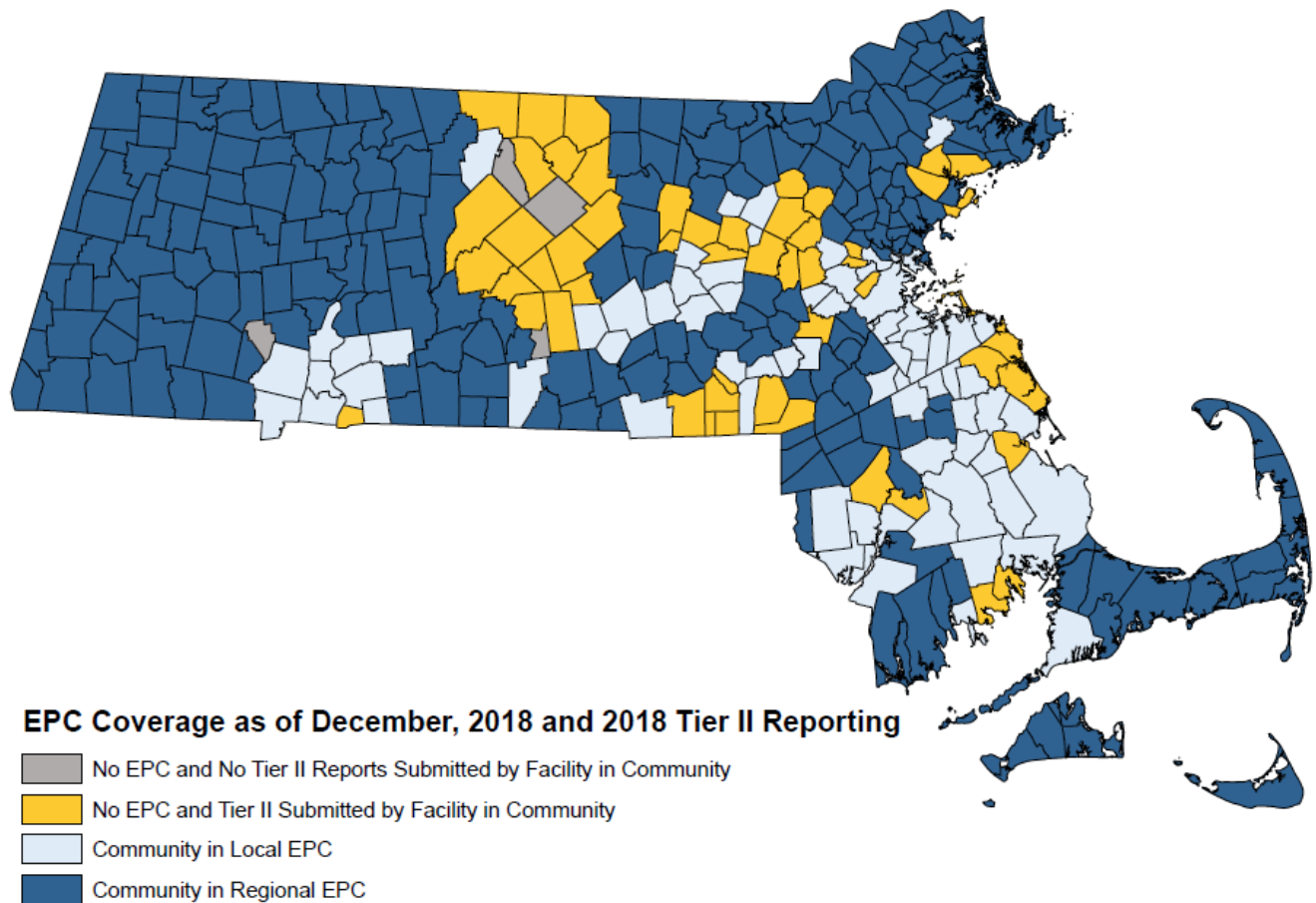
1. The Massachusetts Emergency Management Agency did not meet all its responsibilities under the Emergency Planning and Community Right-to-Know Act.

Although the Massachusetts Emergency Management Agency (MEMA) has been designated by the Governor as the state emergency response commission (SERC) for Massachusetts, it has not established local emergency planning committees (LEPCs) or regional emergency planning committees (REPCs) in all cities and towns with businesses that use and store significant levels of hazardous chemicals. In addition, it did not appoint LEPC and REPC members and could not substantiate that it had ensured that LEPCs and REPCs had effective emergency response plans to deal with any chemical hazards that might occur. As a result of these issues, there is a higher-than-acceptable risk that local communities may not be adequately prepared to deal effectively with any potential chemical hazards.

a. MEMA did not establish emergency planning committees for all cities and towns with businesses storing hazardous chemicals that were subject to reporting under the Emergency Planning and Community Right-to-Know Act.

MEMA did not establish emergency planning committees (EPCs) that included all Massachusetts cities and towns with businesses that stored hazardous chemicals that were subject to reporting under the Emergency Planning and Community Right-to-Know Act (EPCRA).

During calendar year 2018, at least 442 businesses that had inventories of hazardous materials, as evidenced by the fact that they filed Tier II reports with MEMA, were located in 53 different cities and towns for which MEMA had not established LEPCs or REPCs, as shown below.



MEMA officials told us they were not involved in establishing emergency planning districts and did not appoint committee members as required by EPCRA.

Authoritative Guidance

Chapter 116(11001) of Title 42 of the United States Code (USC) establishes that the SERC (MEMA) is responsible for implementing EPCRA within the state. This responsibility includes the following:

- establishing local emergency planning districts
- appointing an LEPC for each district
- reviewing local emergency response plans for each LEPC
- supervising the activities of LEPCs

As previously noted, MEMA has established a 26-member commission to facilitate EPCRA compliance. According to the commission's bylaws, its duties include the following:

- 2. Appointing and coordinating local and regional emergency planning committees for each district, and reviewing local and regional emergency plans . . .*
- 4. Increasing state and local emergency response capabilities.*

Finally, according to officials from the United States Environmental Protection Agency with whom we spoke, every community in a state should be associated with an EPC and every community that has facilities that file Tier II reports is required to be associated with an LEPC or REPC.

Reasons for Issue

MEMA has not established sufficient internal controls or a process to effectively identify where LEPCs and REPCs should be established, based on Tier II reporting information, and ensure that they are established.

b. MEMA could not demonstrate that it received and reviewed each LEPC's/REPC's emergency response plan.

MEMA could not demonstrate that it received and reviewed each LEPC's/REPC's emergency response plan to ensure that each one fully met EPCRA requirements. During our audit, we asked officials at each of the MEMA regional offices to provide us with copies of the emergency response plans they had received from a judgmental sample of 40 different cities and towns. MEMA officials could not produce emergency response plans for any of the 40 communities in our sample.

Authoritative Guidance

The regulation 42 USC 116(11003) requires the following:

(a) Plan required

Each local emergency planning committee shall complete preparation of an emergency plan in accordance with this section. . . . The committee shall review such a plan once a year, or more frequently as changed circumstances in the community or at any facility may require. . . .

(c) Plan provisions . . .

(1) Identification of [businesses that file Tier II reports] that are within the emergency planning district. . . .

(2) Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any release of [hazardous/toxic chemicals].

(3) Designation of a community emergency coordinator and facility emergency coordinators, who shall make determinations necessary to implement the plan.

Reasons for Issue

MEMA has not developed sufficient policies and procedures for reviewing emergency response plans or retaining documentation to substantiate this review.

Recommendations

1. MEMA should identify where EPCs should be established and should establish them.
2. MEMA should establish policies and procedures for reviewing emergency response plans and retaining documentation to substantiate this review.

Auditee's Response

As the lead agency for the Massachusetts State Emergency Response Commission (SERC), MEMA recognizes the importance of EPCRA. At its core, EPCRA is a set of requirements imposed on state and local governments as well as on private entities to ensure effective planning, response, and public notification activities, focused on hazardous substances within our communities. Through the SERC, MEMA brings together subject matter experts from state agencies, local first responders, and industry representatives to oversee and coordinate EPCRA-required activities.

The findings and recommendations made through this audit reflect the auditors' understanding that EPCRA both requires and authorizes the state, through the SERC, to appoint local officials to a local emergency planning committee. This requirement would conflict with Massachusetts' interpretation of municipal self-governance by mandating that a state agency appoint municipal representatives to a municipal body. Rather than interpret the federal legislation as authorizing an approach inconsistent with established state practice, MEMA has instead led the SERC as a state-level coordinating entity for local activities rather than a replacement for local decision-making.

Additionally . . . the draft report purports to quote from the SERC bylaws that its duties include "[a]ppointing and coordinating local and regional emergency planning committees." This quotation references an outdated version of the SERC bylaws. Revisions to the by-laws (approved in January 2019 and available at <https://www.mass.gov/doc/serc-bylaws/download>) do not contain this language.

MEMA Actions Relative to Finding 1a—MEMA will coordinate with local communities and leverage Tier II reports to identify local jurisdictions that should be part of an Emergency Planning Committee (EPC) and conduct outreach to those jurisdictions. MEMA can provide support and guidance in the formation of a LEPC or REPC.

MEMA Actions Relative to Finding 1b—The EPCRA statute requires the SERC to review, but not maintain, local emergency response plans. During the audit period, MEMA brought EPCRA planning into its Comprehensive Emergency Management Plan (CEMP) process. Through this process, emergency response plans at the local level were to be included in a jurisdiction's overall emergency management plan. The result is more effective local level planning that incorporates an all-hazards approach and ensures continual MEMA-Local partnership in strengthening resiliency across all Massachusetts communities. MEMA works regularly with local communities to review plans and provide feedback. Moving forward, MEMA will retain documentation of the plan review process to demonstrate that it is meeting this obligation.

Auditor's Reply

MEMA's response and its reliance upon the principles of self-governance and established state practice conflict with the requirements of federal law. Specifically, 42 USC 116(11001)(c) states,

*Not later than 30 days after designation of emergency planning districts or 10 months after October 17, 1986, whichever is earlier, the State emergency response commission shall appoint members of a local emergency planning committee for each emergency planning district. Each committee shall include, at a minimum, representatives from each of the following groups or organizations: **elected State and local officials; law enforcement, civil defense, firefighting, first aid, health, local environmental, hospital, and transportation personnel; broadcast and print media; community groups; and owners and operators of facilities subject to the requirements of this subchapter.** (Emphasis added.)*

This federal law requires the SERC, in this case MEMA, to appoint specific members, including state and local officials, of an LEPC for each emergency planning district. The federal law does not authorize an exemption for established state practice.

In its response, MEMA acknowledges that it needs to monitor Tier II reports to identify local jurisdictions that should be part of EPCs and that those communities need to have LEPCs or REPCs. We also urge MEMA to consider implementing our recommendations on this matter.

The SERC bylaws that we quote in our report were in effect during our audit period, and we believe they appear to accurately depict the cited responsibilities of the SERC.

Regarding the review of emergency response plans, 42 USC 116(11003)(e) states,

After completion of an emergency plan under subsection (a) [of Section 11003(a)] for an emergency planning district, the local emergency planning committee shall submit a copy of the plan to the State emergency response commission of each State in which such district is located. The commission shall review the plan and make recommendations to the committee on revisions

of the plan that may be necessary to ensure coordination of such plan with emergency response plans of other emergency planning districts.

This federal law, EPCRA, requires the SERC to “make recommendations to” the LEPC on necessary “revisions of” the plan to ensure coordination with the emergency response plans of other emergency planning districts. The law specifically envisions the SERC making recommendations to the LEPC regarding necessary revisions to the plan. It further states that an LEPC “shall submit a copy” of its emergency plan to the SERC. The Office of the State Auditor therefore interprets the federal law to require the SERC to maintain a copy of any emergency response plan that an LEPC submits pursuant to the law.

In its response, MEMA states that it will retain documentation of the plan review process to demonstrate that it is meeting this obligation. We urge MEMA to fully implement our recommendation of establishing policies and procedures for reviewing emergency response plans and retaining documentation to substantiate this review, to ensure that adequate internal controls over this process exist.

APPENDIX

Local and Regional Emergency Planning Committees as of December 2018

Region	Type	Name	Communities Included
2	Local (LEPC)	Abington	Abington
1	LEPC	Acton	Acton
3	LEPC	Agawam	Agawam
4	LEPC	Athol	Athol
4	LEPC	Auburn	Auburn
2	LEPC	Avon	Avon
2	LEPC	Bellingham	Bellingham
2	LEPC	Berkley	Berkley
4	LEPC	Berlin	Berlin
1	LEPC	Boston	Boston
1	LEPC	Boxborough	Boxborough
2	LEPC	Braintree	Braintree
2	LEPC	Bridgewater	Bridgewater
2	LEPC	Brockton	Brockton
1	LEPC	Cambridge	Cambridge
2	LEPC	Carver	Carver
3	LEPC	Chicopee	Chicopee
2	LEPC	Cohasset	Cohasset
2	LEPC	Dighton	Dighton
4	LEPC	Douglas	Douglas
2	LEPC	Duxbury	Duxbury
3	LEPC	East Longmeadow	East Longmeadow
2	LEPC	Fairhaven	Fairhaven
2	LEPC	Fall River	Fall River
2	LEPC	Falmouth	Falmouth
2	LEPC	Halifax	Halifax
2	LEPC	Hanover	Hanover
2	LEPC	Hanson	Hanson
2	LEPC	Hingham	Hingham
2	LEPC	Holbrook	Holbrook

Region	Type	Name	Communities Included
3	LEPC	Holyoke	Holyoke
2	LEPC	Lakeville	Lakeville
4	LEPC	Leicester	Leicester
3	LEPC	Ludlow	Ludlow
1	LEPC	Marlborough	Marlborough
1	LEPC	Maynard	Maynard
2	LEPC	Medfield	Medfield
2	LEPC	Medway	Medway
2	LEPC	Middleborough	Middleborough
4	LEPC	Milford	Milford
2	LEPC	Millis	Millis
2	LEPC	Milton	Milton
2	LEPC	Needham	Needham
1	LEPC	Newton	Newton
4	LEPC	Northborough	Northborough
2	LEPC	Pembroke	Pembroke
2	LEPC	Plymouth	Plymouth
2	LEPC	Plympton	Plympton
2	LEPC	Quincy	Quincy
2	LEPC	Randolph	Randolph
2	LEPC	Rehoboth	Rehoboth
2	LEPC	Rochester	Rochester
2	LEPC	Rockland	Rockland
4	LEPC	Shrewsbury	Shrewsbury
2	LEPC	Somerset	Somerset
4	LEPC	Southborough	Southborough
3	LEPC	Southwick	Southwick
3	LEPC	Springfield	Springfield
2	LEPC	Stoughton	Stoughton
4	LEPC	Sturbridge	Sturbridge
2	LEPC	Swansea	Swansea
1	LEPC	Topsfield	Topsfield
1	LEPC	Waltham	Waltham

Region	Type	Name	Communities Included
2	LEPC	Wareham	Wareham
2	LEPC	Wellesley	Wellesley
3	LEPC	West Springfield	West Springfield
4	LEPC	Westborough	Westborough
3	LEPC	Westfield	Westfield
2	LEPC	Weymouth	Weymouth
4	LEPC	Worcester	Worcester
2	Regional (REPC)	Barnstable County	Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Nantucket, Orleans, Provincetown, Sandwich, Truro, Wellfleet, Yarmouth
4	REPC	Blackstone Valley	Grafton, Millbury, Northbridge, Sutton, Upton
1	REPC	Cape Ann	Essex, Gloucester, Manchester-by-the-Sea, Rockport
3	REPC	Central Berkshire	Becket, Dalton, Hancock, Hinsdale, Lanesborough, Lee, Lenox, Peru, Pittsfield, Richmond, Washington, Windsor
2	REPC	Central Norfolk	Canton, Dedham, Medway, Millis, Norfolk, Norwood, Sharon, Walpole, Westwood
2	REPC	Dukes County	Aquinnah, Chilmark, Edgartown, Gosnold, Oak Bluffs, Tisbury, West Tisbury
3	REPC	Franklin County	Ashfield, Bernardston, Buckland, Charlemont, Colrain, Conway, Deerfield, Erving, Gill, Greenfield, Hawley, Heath, Leverett, Leyden, Monroe, Montague, New Salem, Northfield, Orange, Rowe, Shelburne, Shutesbury, Sunderland, Warwick, Wendell, Whately
2	REPC	Greater Attleboro	Attleboro, Easton, Foxborough, Mansfield, North Attleboro, Norton, Plainville, Seekonk
1	REPC	Greater Lowell	Billerica, Chelmsford, Dracut, Lowell, Tewksbury, Tyngsboro, Wilmington
3	REPC	Hampshire	Amherst, Belchertown, Chesterfield, Cummington, Easthampton, Goshen, Granby, Hadley, Hatfield, Huntington, Middlefield, Northampton, Pelham, Plainfield, South Hadley, Southampton, Ware, Westhampton, Williamsburg, Worthington
1	REPC	Metrowest	Ashland, Framingham, Holliston, Hopkinton, Natick, Sherborn
4	REPC	Montachusett	Fitchburg, Leominster, Lunenburg

Region	Type	Name	Communities Included
1	REPC	Mystic Region	Arlington, Burlington, Chelsea, Everett, Lexington, Lynn, Lynnfield, Malden, Medford, Melrose, Nahant, North Reading, Reading, Revere, Salem, Saugus, Somerville, Stoneham, Wakefield, Winchester, Winthrop, Woburn
1	REPC	Northeast	Andover, Groveland, Hamilton, Haverhill, Lawrence, Methuen, Middleton, North Andover, Wenham
3	REPC	Northern Berkshire	Adams, Cheshire, Clarksburg, Florida, New Ashford, North Adams, Savoy, Williamstown
1	REPC	Northern Essex	Amesbury, Boxford, Georgetown, Ipswich, Merrimac, Newbury, Newburyport, Rowley, Salisbury, West Newbury
1	REPC	Northern Middlesex	Ashby, Ayer, Dunstable, Groton, Harvard, Littleton, Pepperell, Shirley, Townsend, Westford
3	REPC	Quaboag	Brimfield, Brookfield, Hampden, Holland, Monson, Palmer, Wales, Warren, West Brookfield, Wilbraham
2	REPC	Sachem's Rock	Bridgewater, East Bridgewater, Halifax, Hanson, Raynham, West Bridgewater, Whitman
4	REPC	South Wachusett	Boylston, Holden, Sterling, West Boylston
2	REPC	Southcoast	Acushnet, Dartmouth, Freetown, New Bedford, Westport
3	REPC	Southern Berkshire	Alford, Egremont, Great Barrington, Monterey, Mount Washington, New Marlborough, Otis, Sandisfield, Sheffield, Stockbridge, Tyringham, West Stockbridge
4	REPC	Tri-Epic	Charlton, Dudley, Oxford, Southbridge, Sturbridge, Webster
3	REPC	West Hampden County	Blandford, Chester, Granville, Russell, Tolland