

08 SUBRECIPIENT MONITORING AND ASSISTANCE

INTRODUCTION

The Massachusetts Department of Transportation (MassDOT) provides assistance to and monitors subrecipients of FTA financial assistance through a variety of means across a number of departments. Below is an articulation of these activities in the Office of Transportation Planning (OTP), the Rail and Transit Division (RTD), and the Office of Diversity and Civil Rights (ODCR).

THE OFFICE OF TRANSPORTATION PLANNING

1. OTP Staff Responsibility: OTP designates staff as liaisons assigned to each Metropolitan Planning Organization (MPO) in the Commonwealth. OTP Staff liaisons will provide technical assistance to MPOs in certification document preparation and Title VI program implementation, as well as support with monitoring MPO compliance.
2. Content of MPO/TPO Title VI Program Compliance:
 - a. All Metropolitan Planning Organizations and Transportation Planning Organizations (MPO/TPOs), must fulfill general Title VI program requirements and submit documentation to MassDOT of the following:
 - i. Title VI Notice to the Public, including a list of locations for notice posting;
 - ii. Title VI complaint procedures;
 - iii. Title VI complaint form;
 - iv. List of transit-related Title VI investigations, complaints and lawsuits;
 - v. Public Participation Plan including information about outreach methods used to engage minority and limited English populations;

- vi. Language Assistance Plan;
- vii. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient broken down by race, and a description of the process the agency uses to encourage participation of minorities on such committees;
- viii. Primary recipients shall include description of how the agency monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI Program submissions;
- ix. A Title VI equity analysis if recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- x. A copy of board meeting minutes, resolution or other appropriate documentation showing the board of directors or appropriate governing entity/official(s) responsible for policy decisions reviewed and approved the Title VI Program;
- xi. If MPO is a transit provider, requirements of Chapter IV of FTA Circular 4702.1B;
- xii. Demographic profile of the metropolitan area
- xiii. Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process;
- xiv. Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects;
- xv. Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts;
- xvi. Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested);

- xvii. Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested).
3. ODCR Staff Responsibility: Title VI compliance reports of each of the Commonwealth's MPOs will be submitted to ODCR for review and approval. Should ODCR staff find missing components or deficiencies in the submitted program, that information shall be communicated to OTP and the relevant MPO. ODCR will set the schedule for completing Title VI reviews and addressing any corrective actions.

Below is an excerpt from OTP's Title VI "subprogram" document detailing additional subrecipient monitoring and assistance performed by that MassDOT department:

H. CONTINUED MONITORING OF METROPOLITAN PLANNING ORGANIZATIONS (MPOS)

OTP staff, specifically MPO liaisons, will provide training and technical assistance to MPOs and sub recipients for their Title VI- related responsibilities. OTP designates staff as liaisons assigned to each MPO in the Commonwealth. OTP Staff liaisons will provide technical assistance to MPOs in certification document preparation and Title VI program implementation, as well as support with monitoring MPO compliance.

Annual Title VI compliance reports and triennial Title VI program submissions for each of the Commonwealth's MPOs will be submitted to both OTP and ODCR for review and approval. ODCR will set the schedule for completing Title VI reviews and addressing any corrective actions.

H.2 Transportation Scoring Methodology – TIP Development

- Currently the traditional categories used for roadway projects, as part of the regions' transportation evaluation criteria, are: Mobility; Condition Factors; Safety; Community Effects and Support; Cost Effectiveness; Land Use and Economic Development; and Environmental Effects. These criteria will be modified in the coming year to include Title VI, GreenDOT and Modal Shift. Some considerations for the Title VI transportation evaluation criteria might include those listed in item G) above.

Tasks for OTP staff:

- I. To review all regions' transportation evaluation criteria for Title VI components; in the absence of that criterion, that all RPAs ensure its place as part of the overall criteria.
- II. To review RPAs annual UPWPs for Title VI tasks, either as stand-alone items or part of ongoing task development; in the absence of Title VI, that all RPAs ensure its place as part of the overall criteria;

H.3 Transit Methodology

- Currently, the traditional categories used for service improvement/service expansion projects, as part of the regions' transportation evaluation criteria, are Station and ITC Improvements; Parking Improvements; ADA Improvements; ROW and Signal/Communications Improvements; Revenue Vehicle Capacity Improvements; Bus Service Expansion; Rapid transit expansion; Commuter Rail / Boat Expansion; New ITC Facilities.

Tasks for OTP staff:

- I. To review all regions' transportation evaluation criteria for Title VI components; in the absence of that criterion, that all RTAs ensure its place as part of the overall criteria.
- II. To review RPAs annual UPWPs for Title VI tasks, either as stand-alone items or part of ongoing task development; in the absence of Title VI tasks, that all RPAs ensure its place as part of the overall criteria

Tasks for RPA staff:

- I. That each RPA/ RTA provide regular and ongoing evidence of outreach to its Title VI demographics
- II. That each RPA include language of Title VI in its annual UPWP, either as a separate task or part of its task development
- III. That each RPA/RTA gives equal weight to Title VI consideration in its evaluation criteria for potential TIP projects

H.4 Miscellaneous MPO monitoring

Public Participation Plans: All regions' public participation plans will be revised in calendar year 2013 to include significant emphasis on Title VI efforts.

Affirmative Action: Monitor MPOs on AA-EEO workforce profiles in support of MassDOT's Affirmative Action obligations.

THE RAIL AND TRANSIT DIVISION

Direct responsibility for distribution and management of FTA grants is assigned to the Rail and Transit Division. In 2012, the capacity of this office was expanded to manage FTA programs more effectively and specifically to provide more frequent contact with potential applicants and subrecipients in outreach, technical assistance and oversight monitoring, including Title VI compliance.

1. The Division is comprised of the following staff members with responsibilities for FTA program administration:
 - a. Deputy Administrator --- manages office and responsible for direction setting and day-to-day operations. Reports to both Secretary and General Manager.
 - b. Manager of FTA Programs --- reviews, analyzes, and confirms capital project requests submitted by RTAs. Coordinates BusPlus (intercity bus program).
 - c. Manager of Transit Programs --- central point of contact for all RTA business, policies, and procedures.
 - d. Capital & Finance Coordinator --- tracks subrecipient finances and provides financial analysis as well as key administrative support to office.
 - e. Coordinator, Statewide Mobility Management --- administers Mobility Assistance Program (providing 100% accessible vehicles to RTAs, local governments and nonprofits) as well as implements the Governor's Executive Order 530 regarding Community Transportation.
2. Assistance to Subrecipients

- a. Rail and Transit Division annually will hold start-up training session for subgrantee organizations. Start-up meeting will be organized by the Manager of Transit Programs and scheduled in April after grant award announcements (target date for awards is March 15th following outreach and application process). Agenda for this meeting will include module on Title VI Program requirements as outlined in FTA Circular C4702.1B and involve participation of MassDOT 's Title VI Specialist, the Manager of Federal Programs and the Title VI Coordinator with the Office of Diversity and Civil Rights and/or his/her designee. A copy of the SFY2015 training announcement and agenda is included in Appendix 08-A.
- b. Rail and Transit Division will serve as resource center for grantees and provide regular communications to subrecipients on Title VI compliance issues including FTA information materials updates, webinars and documents highlighting best practices in effective public outreach to minority/low income/Limited English communities, service monitoring and policy development. A copy of the SFY2015 transit grant program application instructions for subrecipients is included in Appendix 08-B.
- c. Rail and Transit Division will participate through organizations, including the Mass. Association of Regional Transit Agencies, MPOs and TMA Collaborative, periodic information and peer-to-peer sessions on transit service/mobility management and Title VI compliance.
- d. Rail and Transit Division managers will share Commonwealth demographic updates with subgrantees and provide sample documents on Notice of Rights, complaint procedures and Language Assistance Plan, all of which will be made available for use/adoption by subgrantees.

3. Subgrantee Reporting

- a. All subrecipients are required to submit annual benchmark progress reports to the Rail and Transit Division. These reports are due annually Sept. 30th and include information on project service delivery measures and Title VI Program compliance documentation.

- b. Rail and Transit with assistance of the ODCR Title VI Coordinator will review all subrecipient Title VI submittals for completeness and compliance with federal requirements. Specific submittal requirements are as noted below and as outlined in FTA Circular C4702.1B appendices.
- c. All subrecipients, except those who also are direct recipients of other FTA funds, must fulfill general Title VI program requirements and submit documentation to MassDOT of the following:
 - i. Title VI Notice to the Public, including a list of locations for notice posting;
 - ii. Title VI complaint procedures;
 - iii. Title VI complaint form;
 - iv. List of transit-related Title VI investigations, complaints and lawsuits;
 - v. Public Participation Plan including information about outreach methods used to engage minority and limited English populations;
 - vi. Language Assistance Plan;
 - vii. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient broken down by race, and a description of the process the agency uses to encourage participation of minorities on such committees;
 - viii. A Title VI equity analysis if recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center etc.
 - ix. A copy of board meeting minutes, resolution or other appropriate documentation showing the board of directors or appropriate governing entity/official(s) responsible for policy decisions reviewed and approved the Title VI Program;

- d. Subrecipients who are fixed route transit providers, in addition to documentation listed above, must also submit the following documentation:
 - i. Service Standards
 - 1. Vehicle Load for each mode;
 - 2. Vehicle headway for each mode;
 - 3. On time performance for each mode;
 - 4. Service availability for each mode.
 - ii. Service Policies
 - 1. Transit Amenities for each mode;
 - 2. Vehicle Assignment for each mode.
- e. Subrecipient transit providers operating 50 or more fixed route vehicles in peak service and located in an Urbanized Area of 200,000 or more people must also submit the following documentation:
 - i. Demographic and service profile maps and charts;
 - ii. Demographic ridership and travel patterns , collected by surveys;
 - iii. Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis;
 - iv. A description of the public engagement process for setting the “major service change policy”, disparate impact policy and disproportionate burden policy;
 - v. Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.

4. Field Visits

- a. MassDOT Rail and Transit during the program year will conduct program compliance reviews including selected site visits. Inspection reviews will include documentation of federal Title VI compliance requirements using the above checklists from FTA Circular. MassDOT staff or consulting contractor to be procured to assist with administrative oversight will review programs of subrecipient agencies on an annual basis and schedule selected agencies each year for compliance monitoring on-site visits.

The MassDOT managed FTA Community Transit Grant Program includes structured public outreach and involvement procedures and obligations throughout the grant application process, from outreach to potential grantees to training those individuals and organizations selected to receive FTA funds.

MassDOT Transit makes customer service, outreach and technical assistance a top priority. MassDOT Staff chair a quarterly RTA Council, participate/attend monthly Massachusetts Association of Regional Transit Authority meetings in Worcester and Boston and join in weekly RTA conference calls. Other sub-recipients receive significant support on an as needed basis including five (5) training sessions related to our annual Community Transit Grant Application process. In collaboration with various Metropolitan Planning Organizations, these training sessions are conducted throughout Massachusetts. The following training sessions were conducted this year in Worcester and Springfield on February 3rd, Taunton on February 6th, and in Lowell and Boston on February 7th. Additionally, MassDOT Transit staff provides exemplary support to all applicants who are in need of technical support and assistance through completion and submittal of a Community Transit Grant application. Transit staff fields many telephone calls and emails from applicants submitting Community Transit Grant applications. Transit staff will assist any applicant who has questions about the application process, or is in need of assistance in the submittal of a completed application.

Each regional Transit Authority has at least two (2) site visits with one focused entirely on mobility management efforts as related to federal grant funding. A thorough overview of transit programs are conducted with RTA Administrators and staff, along with a detailed tour of RTA facilities and transit service areas.

Additionally, MassDOT Transit is in the process of filling some key positions to help bolster its efforts to ensuring that a proper level of support is in place to provide unparalleled customer support and outreach. The Transit Division recently hired a Transit & Capital Analyst and is in the process of interviewing to fill two (2) Transit Project Manager positions. MassDOT Transit has also recently procured the services of a consultant who is tasked with overseeing MassDOT Transit efforts of ensuring that a thorough and complete sub-recipient monitoring and compliance system is in place.

Finally, with the creation of MassDOT, the MBTA's resources are now available to all sub-recipients. Safety, Maintenance and Training staff are readily available to provide training or technical assistance. MassDOT Transit works closely with other MassDOT divisions, such as the MassDOT Office of Planning and Office of Diversity and Civil Rights which provides specialized technical assistance.

THE OFFICE OF DIVERSITY AND CIVIL RIGHTS

The Office of Diversity and Civil Rights (ODCR) is responsible for ensuring that MassDOT fulfills its Title VI obligations through effective management of the agency's Title VI Program.

At MassDOT, the Chief Diversity and Civil Rights Officer (CDCRO) of the Office of Diversity and Civil Rights serves as the Title VI Coordinator. In this capacity, the CDCRO reports directly to the Secretary & CEO of MassDOT on overall state and federal civil rights obligations and to the MassDOT Administrator of Rail and Transit on civil rights matters concerning FTA-funded programs. The Manager of Federal Programs coordinates Title VI Program management with the Title VI Specialist and reports to the Director of the Office of Civil Rights. The Manager of Federal Programs supervises the Title VI Specialist, who is charged with the responsibility of implementing, monitoring, and ensuring MassDOT's compliance with Title VI regulations in terms of both the day-to-day administration and the annual reporting obligations.

What follows is a description of the support provided to the Rail and Transit Division by the Office of Diversity and Civil Rights in monitoring FTA subrecipients such as RTAs and organizations that receive FTA state-managed funds.

1. ODCR Assistance to Rail & Transit Division

a. Staff Training:

- i. ODCR Title VI Specialist and Manager of Federal Programs organize the agenda of the MassDOT Title VI working group. The working group is comprised of representatives from all MassDOT departments, including Rail & Transit.
- ii. ODCR staff, with assistance of MBTA representatives, train Rail & Transit new staff hires on FTA Title VI Circular requirements and MassDOT agency Title VI Program procedures.

b. Subrecipient Selection

- i. ODCR staff representative(s) participate as voting member(s) in rating/evaluation of proposals submitted in response to MassDOT request for subrecipient proposals. ODCR provides input in selection process in equity evaluation of Rail & Transit recommended program.

c. Subrecipient Training

- i. ODCR participates in Rail & Transit scheduled subrecipient grant start-up session and lead module on Title VI Program compliance requirements. ODCR contact is available for technical assistance to subrecipients in program implementation.
- ii. ODCR provides guidance, updates and resource information on Language Assistance Plan implementation and Public Participation outreach.

d. Subrecipient Title VI Programs Review and Approval

- i. ODCR provides reporting template for subrecipient Title VI reporting. ODCR reviews subrecipient compliance reports for approval. ODCR coordinates with Rail & Transit staff in communicating any deficiencies for corrective action by the subrecipient and assists in facilitating program compliance. Should any deficiencies be identified in program monitoring, the Title VI Specialist notifies Rail & Transit staff and

subrecipient in writing of specific deficiencies identified and scheduled deadline for corrective action.

- ii. ODCR Title VI Specialist and Federal Program Manager are included on subrecipient site visit inspections to be organized and scheduled by Rail & Transit staff.

While the Rail and Transit Division coordinates subrecipient monitoring and assistance activities across the RTAs and state-managed FTA grant recipients, the monitoring and assistance of subrecipient MPO's falls primarily to the Office of Diversity and Civil Rights and the Office of Transportation Planning. While the structure of ODCR's and OTP's monitoring of MPOs for Title VI compliance is based largely on the Federal Highway Administration's (FHWA's) Title VI compliance review program, it also contemplates FTA Title VI requirements and interpretations, where applicable. What follows is an excerpt from MassDOT's FHWA Title VI/Nondiscrimination Program which describes the Title VI monitoring and assistance activities engaged in by ODCR and OTP in relation to the MPOs as subrecipients of federal financial assistance (both FTA and HWA).

Subrecipient Compliance Monitoring

Certifications and Assurances

The FTA Certifications and Assurances is executed by direct recipients (such as MassDOT) as an acknowledgement of Title VI. Subrecipients (such as MPOs, RTAs, RPAs, and Community Transit Grant Program awardees) are similarly obligated to execute the Certifications and Assurances. Part of MassDOT's subrecipients monitoring activities includes ensuring that subrecipients are executing this document and implementing its provisions appropriately. MassDOT requires MPOs, RTAs, and RPAs to execute the Certifications and Assurances annually and/or with each funding request application. MassDOT requires municipalities to execute Title VI/Nondiscrimination Assurance every ten (10) years.

Subrecipient Monitoring Methodologies

MassDOT's Title VI staff regularly interacts with subrecipients in a variety of ways. These interactions afford MassDOT with an opportunity to monitor these entities for Title VI/Nondiscrimination compliance. Key methods are described below:

- The Transportation Managers Group (TMG)

This group, which convenes monthly, is comprised of MPO and RPA managers and staff from across the state. MassDOT's Title VI staff attends regularly to discuss Title VI/Nondiscrimination issues with these subrecipients. The discussions range from MassDOT's Title VI staff reporting findings and recommendations on MPO and RPA Title VI/Nondiscrimination program submissions to providing direct technical assistance on Title VI/Nondiscrimination program implementation.

- Workshops/Conferences

MassDOT's Title VI staff utilizes subrecipient conferences and workshops to advance Title VI/Nondiscrimination program development and implementation and to troubleshoot areas of persistent concern. Most recently this has included Title VI/Nondiscrimination presentations statewide to municipal officials. Upcoming events include group and individual sessions with MPO and RPA staff. These sessions allow MassDOT to gauge awareness of and compliance with Title VI/Nondiscrimination obligations across all subrecipient categories. It also provides a forum through which to provide direct technical assistance to subrecipients.

- Triennial Reporting

MPOs and RPAs are required to submit triennial Title VI/Nondiscrimination Program updates to MassDOT. While these subrecipients can choose to adopt MassDOT's Title VI/Nondiscrimination program elements, they are also permitted to develop program components independently. These triennial submissions give MassDOT the opportunity to assess the sufficiency of program development and implementation. MassDOT's response to these submissions is the same as annual reporting – tailored Title VI/Nondiscrimination work plans and follow-up conferences.

- Federal MPO Certification Reviews

FHWA and FTA conduct recurring Certification Reviews of MPOs and RTAs statewide. The current cycle for these reviews reaches each region about once every three (3) to four (4) years. Since 2013, MassDOT has been directly involved in the Civil Rights portion of the Certification Review. This includes reviewing pre-site-visit documentation from the MPO/RTA, participating in the on-site session (which includes detailed discussions of Title VI/Nondiscrimination obligations, current levels of compliance, and areas for improvement), and contributing to the drafting of an Observations and Recommendations Report. This collaboration benefits all parties involved by facilitating the sharing of information and promoting consistent messaging, thus better serving the beneficiaries of Title VI/Nondiscrimination protections.

- SharePoint

MassDOT has found that a number of subrecipients make consistent mistakes in Title VI/Nondiscrimination program development and implementation. The reasons for this are numerous, but stem from the complexity of the law, the multiple unique obligations across federal modal administrations, and the practice of “cutting and pasting” from Title VI/Nondiscrimination programs that contained inaccuracies from other regions. To address this, MassDOT created a SharePoint webpage specifically focused on Title VI/Nondiscrimination. The Title VI staffs of all Massachusetts MPOs and RPAs were granted access to this resource. This webpage will not only allow these subrecipients to submit Title VI/Nondiscrimination reports and programs electronically to MassDOT, but it also allows MassDOT to share documents with them. This includes sharing template Title VI/Nondiscrimination documents and program components that are persistently problematic, such as complaint procedures. Ensuring that these documents are implemented by subrecipients through reporting or meetings aids in MassDOT’s monitoring activities.

- Desk Audits and On-Site Visits

MassDOT’s Title VI/Nondiscrimination Program contemplates a detailed review of at least one MPO/RPA each year. In practice, MassDOT regularly looks at more than one MPO/RPA each year (through reporting activities and through participation in the federal Certification Review process). When MassDOT initiates a more detailed review of such subrecipients, it includes a desk audit and an on-site visit. Similar to the federal Certification Review process, MassDOT requests a pre-site-visit materials submission from the subrecipient. This usually includes key

Title VI/Nondiscrimination program documents (such as notice, complaint procedures, public participation plans, and language access plans) as well as requests for analytical information (such as project distribution in the region and any indication of disparities). This desk audit review is followed by an on-site session. These sessions allow MassDOT's Title VI staff to discuss the findings of their desk audit, to strategize the subrecipients corrective action plan, and to provide direct technical assistance, where needed. To facilitate compliance reviews, subrecipients are required to keep and submit records for review, as requested, as well as provide access to these records.

Variable Prioritization of Subrecipient Monitoring

While the cycle of external subrecipient monitoring is structured based on risk-based prioritization, it is not rigid. The subrecipients assessed during any given annual cycle can change based on the following factors:

- Federal Certification Review Schedule

MassDOT strives to coordinate its subrecipient monitoring review schedule with the federal Certification Review schedule. This can mean that MassDOT will pursue focusing its monitoring activities on subrecipient MPOs and RPAs that will be going through a Certification Review in the near future or it will hold off on independent monitoring activities to incorporate them into an upcoming Certification Review. The goal of accommodating the Certification Review process is not only to avoid duplicative efforts with subrecipients but also to ensure the consistency of process and message from both the federal and state levels.

- Complaints

Changes in the characteristics of frequency or type of complaints received against subrecipient MPOs and RPAs could indicate the need for increased scrutiny for Title VI/Nondiscrimination compliance. If MassDOT feels that a pattern of complaints warrants additional monitoring of subrecipients, the Title VI staff will do so.

- Staffing Changes

Staffing changes at MPOs and RPAs can impact the Title VI/Nondiscrimination activities in those regions. This can happen because of the reduction of corporate

knowledge on these issues or through reduced resources to address these needs. In fact, even staffing changes at MassDOT's Office of Transportation Planning (which includes an MPO Activities section that interacts with and guides MPOs and RPAs on Title VI activities) can impact the degree of Title VI/Nondiscrimination compliance among these subrecipients. MassDOT may shift its subrecipient monitoring activities to those that have undergone staffing changes to ensure that Title VI/Nondiscrimination obligations are still being fulfilled.

- Projects

Transportation projects carry with them varying degrees of Title VI/Nondiscrimination risk, impacts, and interest. When MassDOT becomes aware of transportation projects that could be considered controversial or significant from a Title VI/Nondiscrimination perspective, this can prompt increased monitoring activities at the MPO or RPA that is programming the project at issue.

- Patterns Indicating Noncompliance

The cycle of subrecipient monitoring activities does not guarantee that all the programs, services, or activities of an MPO, RTA, or RPA are or will be Title VI/Nondiscrimination compliant. Several methods of MassDOT's subrecipient monitoring process involve the development and issuing of tailored work plans to bring noncompliant subrecipients into compliance. As MassDOT's Title VI staff follows up on the progress of the action items outlined in the work plans, it may become clear that some areas remain persistently unaddressed. Such patterns of noncompliance could prompt additional monitoring activities out of sequence from the cycle.

- Additional Factors

MassDOT's Title VI staff regularly engages in research and analysis of Title VI compliance strategies across the nation as it strives to identify best-practices and innovate new methods to ensure Title VI adherence.

Subrecipient Corrective Actions

Effective compliance with Title VI requires MassDOT to take prompt action to achieve voluntary compliance in all instances in which noncompliance is found. If

a Program or subrecipient is determined to be out of compliance or is believed to be out of compliance with Title VI/Nondiscrimination obligations, MassDOT has three potential remedies:

- Resolution of the noncompliance status or potential noncompliance status by voluntary means by entering into an agreement which becomes a condition of assistance is the first option.
- Where voluntary compliance efforts are unsuccessful, a refusal to grant or continue the assistance is initiated, or
- Where voluntary compliance efforts are unsuccessful, the violation is referred to FHWA, which will forward it to the U.S. Department of Justice for judicial consideration.

Every effort will be made to obtain compliance through voluntary corrective action.

Subrecipient Title VI Work Plans

MassDOT's review of subrecipient Title VI Program submissions concludes with the development and issuance of a customized Title VI Work Plan to each. A sample of such plans from ODCR's most recent review of MPO and RTA Title VI Programs is available in Appendix 08-C. Once these plans have been developed, ODCR's Title VI staff communicates the findings directly to the staff and leadership of the subrecipient organizations and provides ongoing technical assistance to ensure each finding is satisfactorily addressed. ODCR is planning a statewide workshop in September 2014 to collaborate with subrecipients on Title VI program development and identify opportunities for sharing resources in this work.