



METROWEST

REGIONAL TRANSIT AUTHORITY

TITLE VI PROGRAM

October 1, 2016

I. Title VI Program Statement

Title VI of the Civil Rights Act of 1964 prohibits the discrimination of individuals on the basis of race, color or national origin in programs and activities that receive Federal financial assistance. Specifically, Title VI states that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or to be subject to discrimination under any program or activity receiving Federal financial assistance.” (42 USC Section 2000d)

The Metrowest Regional Transit Authority (MWRTA) is a strong supporter of civil rights in the workplace and in our community and as such we are committed to the letter and intent of Title VI of the Civil Rights Act of 1964. This Title VI Program has been adopted to document MWRTA's adherence to non-discrimination policies in its operations.

At the discretion of FTA, information other than what is required by this circular may be requested, in writing, from a recipient or subrecipient to investigate complaints of discrimination or to resolve concerns about possible non-compliance with Title VI. If you need this information or have further questions about Title VI, please contact our Title VI Coordinator at:

Eva Willens
Deputy Administrator
Metrowest Regional Transit Authority
15 Blandin Avenue
Framingham, MA 01702

eva@mwrta.com

Phone: 1-508-935-2222

II. Title VI Information Dissemination

In compliance with 49 CFR Section 21.9 (d) Notice to Beneficiaries of Protection under title VI, MWRTA provides Title VI information on its website <http://MWRTA.com>. The website provides information on the Federal Title VI program including contact information for people seeking additional information on the agency's Title VI program. MWRTA's website is heavily used by our customers and employees as it is the main portal for schedules, real time bus location information and news and updates about the transit authority.

While MWRTA believes the website reaches many of our customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Notice to Beneficiary information regarding Title VI is also posted at our main transfer hub at 15 Blandin Avenue in Framingham. At this site many of our customers

come to transfer between buses, add value to their passes or be certified for various programs. The information is also posted in employee lounges for both contracted and MWRTA employees. MWRTA also holds informational outreach with employees discussing the Title VI program and emphasizing its importance. Most importantly, to ensure that the Title VI information reaches the riding public, MWRTA periodically posts Notice to Beneficiary information on all fixed route and demand response vehicles.

MWRTA includes Title VI information in its new hire orientation. Title VI information is available in the preferred language of the individual both electronically and in printed form.

III. Subcontractors and Vendors

All contractors, subcontractors and vendors receiving federal funds are subject to the provisions of Title VI of the Civil Rights Act. All federally funded contracts include non-discrimination provisions to ensure that not only are requirements followed but to ensure that Title VI compliance remains an important feature of working with/for our organization.

IV. Record Keeping

Eva Willens is the MWRTA's Title VI Coordinator. Ms. Willens is the agency's Deputy Administrator and a prominent decision-making employee who reports directly to the agency's Administrator. Ms. Willens maintains the agency's records and is key in the development of contracts and other Title VI relevant materials including human resources materials.

Ms. Willens has resources available to translate the agency's Title VI policy into the languages most common to the MetroWest region, including a contract with a language translation service which can provide real time oral and written translation services. She also keeps copies of the agency's Title VI policy to distribute to new hires. In addition, she keeps a log of Title VI complaints made to the agency, follow up activities and resolutions. Ms. Willens is the primary investigator of Title VI complaints for the agency. Included in the files are copies of all relevant information regarding complaints or lawsuits filed against the transit authority. A copy of the log sheet is included as an appendix to this plan.

It should be noted at the time of adoption of this document, the MWRTA had not received any Title VI complaints from either passengers or employees.

TITLE VI PROGRAM CHECKLIST

RECIPIENTS SERVING URBANIZED AREAS WITH POPULATIONS OF 200,000 PEOPLE OR GREATER

The following sections address requirements of the Title VI Program for recipients serving urbanized areas with populations of 200,000 people or greater.

Provision: Title VI Complaint Procedures

Circular Reference: Chapter IV, Part 2
Regulations or Reference: 49 CFR 21.9(b)
Reporting Requirement: Procedures for Filing a Title VI Complaint

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI complaint investigation and tracking procedures developed by the recipient.

Title VI Complaint Procedures

The MWRTA Title VI process involves a three step process: initiation of the complaint, information gathering, and determination. MWRTA will investigate all complaints and promises a determination for the complainant within two weeks time. If a person is unsatisfied with the determination, they may appeal the finding and work directly with the MWRTA Administrator to seek potentially a different resolution. If that decision is not acceptable to the complainant, they will be referred to the Federal Transit Administration to pursue an alternate resolution.

A copy of the complaint process in English, Spanish and Portuguese is included as Appendix A to this program.

Title VI Complaint Policy

If you feel you have been discriminated against by MWRTA staff, contractors or service provided by the agency, please contact the MetroWest Title VI Officer - Eva Willens at 508-935-2222. Ms. Willens will ask you to submit your complaint in writing using the form provided. Please include as much information as possible including date, time and location of the incident. Ms. Willens will investigate the complaint and get back to you within two weeks.

If the investigation and resolution do not satisfy you, you have the right to appeal by contacting the agency Administrator, Ed Carr who will provide a determination and a proposed resolution on the matter within a two week period. The MWRTA Transit Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration at 617-494-2055 for further determination. When contacting the FTA please refer to Title VI complaints and you will be redirected to the appropriate staff person.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is our goal to ensure that all people are treated fairly in the provision of federally funded transit services.

(A copy of the complaint form is included as Appendix B of this program.)

Provision: Title VI Investigations, Complaints or Lawsuits

Circular Reference:	Chapter IV, Part 3
Regulations or Reference:	48 CFR 21.9(b)
Reporting Requirement:	List of Title VI investigations, complaints, or lawsuits filed with the agency since the last submittal

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color or national origin. The list shall include the date the investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the recipient or subrecipient in response to the investigation, lawsuit, or complaint.

At the time of the adoption of this document, the MWRTA had not received any Title VI complaints from either passengers or employees.

MWRTA has a process in place to record any investigations, complaints and lawsuits. A copy of this template is attached as Appendix C of this program.

Provision: Access to Services by Persons with Limited English Proficiency (LEP)

Circular Reference: Chapter IV, Part 4
Regulations or Reference: 49 CFR 21.5(b) and DOT LEP Guidelines
Reporting Requirement: Agency’s Plan for Providing Access to meaningful activities and programs for persons with LEP based on DOT LEP guidance – or – Agency’s alternative framework for providing access to activities and programs

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Developing a Language Implementation Plan. Recipients and subrecipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance. Certain FTA recipients or subrecipients, such as those serving very few LEP persons or those with very limited resources may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient’s program or activities. Recipients or subrecipients electing not to prepare a written language implementation plan should consider other ways to reasonably provide meaningful access. The elements of an effective implementation plan on language assistance for LEP persons can be found at Section VII of the Department’s Policy Guidance located at 70 FR 74087 (2005).

Individuals who have a limited ability to read, write, speak or understand English are limited English proficient, or “LEP.” According to the 2010 US Census, more than 24 million people reported that they do not speak English at all or do not speak English very well. The number of people reporting that they do not speak English well or at all increased from 10 million in 2000 to 24 million in 2010 documenting an increased need for LEP services.

Title VI of the Civil Rights Act of 1964, 42 USC 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau versus Nichols*, 414 US 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

To assess the needs in our community MWRTA conducted a four-factor analysis to determine our language assistance needs and to be able to target out resources appropriately.

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1, Step 1C – MWRTA has surveyed agency staff to determine frequency of contact with LEP persons either through phone contact, at our customer service center at our agency hub, or while using MWRTA services.

Agency call center staff observed that they received occasional requests in Spanish, Russian, French, Portuguese, and Chinese. The agency is staffed with a Spanish speaking call taker to address calls received in Spanish. Other languages are referred to the agency’s language line.

For the most part customers and call takers can work with the caller to meet their translation needs. However, in the event that communication becomes a barrier, the MWRTA has retained a real-time language line which employees can use to provide information and book trips.

The customer service area at the transit hub are staffed on a daily basis with people fluent in French, Creole, Portuguese, Spanish, and Vietnamese. Staff say they regularly have LEP individuals come in with questions and they are able to communicate with them effectively providing schedules or information about fares.

Discussions with drivers indicate that they have passengers who are LEP and that usually they are able to answer the questions intuitively – such as Donde esta la Market Basket? When a driver enroute encounters a rider with question that he or she is unable to answer – they relay the information to dispatch and a person who is fluent in the appropriate language responds. If no one speaks the appropriate language, translation resources are available through the agency’s contracted language line with MAPA translation services. This company is available to translate critical documents into languages spoken by our riding public

Task 1, Step 2D - Identify any concentrations of LEP persons within your service area

The following chart provides an overview of local populations 5 years and older who speak English “not well” or “not at all.” Data used in these Tables was provided by the American Community Survey.

Community	Population >5 Years	Total LEP	% LEP
Ashland	13,203	133	1%
Dover	4,938	8	0%
Framingham	61,524	4,240	7%
Holliston	12,424	84	1%
Hopkinton	11,619	29	0%
Hudson	16,515	660	0%
Marlborough	33,063	1,333	4%
Milford	18,360	862	5%
Natick	29,149	299	1%

Sherborn	3,725	20	1%
Southborough	7,275	0	0%
Sudbury	14,832	52	0%
Wayland	11,679	74	1%
Wellesley	24,058	239	1%
Weston	10,090	75	1%
Total	275,470	8,108	3%

MWRTA analysed data from the US Census Bureau’s American Community Survey to determine the proportion of the population that was LEP. Based on the Census tables, the proportion of the population who speak English “not well” or “not at all” in the MWRTA combined service area was 3%. The language grouping most frequently spoken after English was Portuguese. This is confirmed through Census information and outreach to a variety of social service organizations including local housing authorities and Councils on Aging.

In the MetroWest, over 1.5% of the population speaks Portuguese and speak English “not well” or “not at all.” In addition 1% of the service area speaks Spanish as a primary language while speaking English “not well” or “not at all.”

It is interesting to note that 69% of the MWRTA’s LEP population are located in the service areas two largest communities: Framingham and Marlborough. Portuguese is the dominant foreign language spoken in both of the communities as confirmed through census and outreach data sources.

Of those languages most popular in the Metrowest as a whole, Portuguese represents just over half of the speakers who not speak English “not well” or “not at all” (51%). Spanish is the second most common language spoken by people in the Metrowest who speak English “not well” or “not at all” (31%). Russian is the language spoken by the third highest proportion of LEP people in the Metrowest who speak English “not well” or “not at all” (3%). Other languages spoken by people over 5 years of age who speak English “not well” or “not at all” are: Chinese, Italian, French, Greek, Hindi, Persian, French Creole, German, Gujarathi, Vietnamese, Hebrew, Korean, Arabic, Polish, Cantonese, Japanese, Indian (not classified), Yiddish, Armenian, Khmer, Mandarin, Bengali, Czech and Thai.

Five of the fifteen communities in the Metrowest area have Portuguese as the dominate language for people who do not speak English “very well” or “not at all”– Framingham, Hudson, Marlborough Milford and Natick. Spanish is the most popular language spoken by the LEP population in Holliston, Hopkinton, Wayland and Wellesley. Spanish and Greek are the most popular LEP languages spoken in Dover with 4 individuals each citing those languages as their primary language. German is the most popular language spoken by the LEP population in Sudbury and Weston. Russian is the most popular language spoken by LEP in Ashland and French for those in Sherborn. There are no LEP people in Southborough.

Only two languages qualify as safe harbor languages based on the defined safe harbor levels of at least 1000 individuals or 5% of the population. Those languages are Portuguese and Spanish. There are 4,095 LEP people who speak Portuguese as their primary language in the MWRTA service area representing 1.6% of the population and 2545 LEP people who speak Spanish representing 1% of the population of the service area. The next most popular language for the the LEP community in the Metrowest service area is Russian with 344 people speaking the language (0.1% of the population).

Task 1 Step 3: Consult state and local data sources

MWRTA researched information provided by local workforce investment Boards in the Metro South West region of Massachusetts to further determine the mix of languages in the Metrowest service area. The agency also researched findings by the Massachusetts Migration Policy Institute to determine LEP patterns in the region. The dominate language for people in the Metrowest region who speak English “not well” or “not at all” is Portuguese, followed by Spanish. These are the only two languages that meet the safe harbor thresholds of 1000 individuals or 5% of the population. Nationwide the percentage of LEP individuals 4.6%. In Massachusetts that figure increases to 5.8%. In the Metrowest region, LEP individuals represent 3% of the population. While no individual language group meets the safe threshold of 5% of the population, Portuguese and Spanish meet the safe harbor threshold as the number of limited English proficiency speakers is greater than 1000.

Task 1 Step 4: Reach out to community organizations that serve LEP persons

MWRTA is an active participant in the community and regularly works with agencies and organizations which provide services to members of the LEP community. We provide information to these organizations directly that can be used to reach out to their clients in a “train the trainer” style model. In addition, MWRTA employs a diverse workforce that shares its knowledge and skill sets. For example, MWRTA will use intermediaries to provide information to persons who do not speak English well or at all. We also hold training and informational sessions throughout the service area to get information about our services out to the community including at the Rose Kennedy Center of the Framingham Housing Authority where MWRTA uses translators to communicate with LEP individuals. Some of the agencies that we work with use LEP specialists who assist with training. Included in this list of organizations are hospitals and the Framingham Council on Aging. We consult with these specialists as to the best way to distribute information to the community. In addition, MWRTA has contracted with a language translation service to ensure that critical documents are translated in key languages.

A list of vital documents translated in Safe Harbor languages is attached as Appendix D to this document.

Factor 2: The Frequency with which LEP Individuals come into Contact with your programs, activities and services.

MWRTA staff in various functional positions were surveyed regarding their frequency of involvement with LEP individuals. The paratransit call center indicated that they receive calls from individuals with limited English skills about 5 – 8 times per week. If an individual needs language assistance, the call center will transfer the call to a bilingual staff member who was hired by the MWRTA in part for their language skills.

Similarly, the customer service desk and main phone line of the transit authority estimate that they interact with the LEP community daily. Several MWRTA staff (including contracted employees), including the phone operator/customer service desk representative are bi-lingual.

It should also be noted that MWRTA has translation software on its website which allows users to view the site in twelve languages including those languages most common to the MWRTA and the Metrowest LEP population. In addition to viewing it on the internet, MWRTA can print out translations of all of our important notices and information as requested. The agency has also contracted with MAPA translation services to ensure that key documents are translated appropriately to critical languages in the service area.

MWRTA also posts relevant Title VI notices and information in Portuguese and Spanish. We believe this provides our customers with information that otherwise may not be accessible to them.

Factor 3: The importance of LEP Persons of your Program, Activities, and Services

Task 3 Step 1: Identify your agency's most critical services

MWRTA views transportation as being a critical service to everyday life for all people including those who are LEP. We provide access to jobs, shopping, medical and educational activities as well as recreational and social needs.

MWRTA believes that all transportation for all uses is important to individuals living a full life. However, clearly medical trips are the most critical. MWRTA provides access to medical services on fixed route and paratransit services. MWRTA certifies individuals regardless of language skills and makes a concerted effort to hire individuals who are fluent in Portuguese and Spanish – the LEP languages of our service area.

Task 3 Step 2: Review input from community organizations and LEP persons

MWRTA is active in the community and seeks input on needs from agencies on a regular basis through both formal and informal channels. The agency also receives input from our customers via suggestions either to our drivers, our customer service desk or via email on our website. A recent customer survey which was conducted in multiple languages resulted in two Portuguese forms with comments being submitted. From these suggestions we have heard of our customers desire for night and weekend service and have added service when possible. We

have also heard about the importance of on-time performance and have adjusted our schedules to more accurately reflect running times in traffic.

MWRTA holds training programs throughout its service area. Some organizations such as hospitals and some Councils on Aging have LEP outreach staff who have attended our sessions. We have also had outreach activities conducted in Portuguese and Chinese and have used sign language interpreters. These events featured a translator so that individuals could ask questions regarding MWRTA services.

Factor 4: Resources available to the Recipient and Cost

Task 4, Step 1: Inventory language assistance measures currently being provided, along with the associated costs.

MWRTA provides language assistance through a variety of resources. As a small agency, we find low-cost solutions that allow us to meet our LEP goals through the course of our everyday activities.

- Website – The MWRTA website is well used by our riding public. It is a conduit for news releases and information about our services. MWRTA uses Babelfish, a free and commonly used translation software; to allow customers to translate our website into one of 12 languages including Portuguese and Spanish – the most commonly spoken languages in the Metrowest by residents who speak English “not well” or “not at all.”
- Written materials – MWRTA provides copies of news releases and other materials including Title VI and employment regulations in alternative languages. Information, depending on the use, is posted in either the agency’s offices, at the transit hub or on board the agency’s vehicles. MWRTA uses the simplest language possible in posting information to make the message as clear as possible to as many people as possible including those that only have limited English skills.
- Workforce - MWRTA strives to hire a diverse workforce. Language skills are a definite plus for employment candidates and are thoughtfully considered in hiring decisions. MWRTA has hired a scheduler for our call center who is fluent in Spanish and can also translate for customers who speak Portuguese. In addition, our main desk/dispatcher and customer service center is staffed with a multi-lingual representative and other agency staff have additional language skills including Vietnamese. Callers requesting language assistance are directed to the person who is most likely able to answer their questions or take their comments.
- “I speak” cards – MWRTA has available the same “I speak” cards that are similar to those used by the US Census Bureau so that if a customer needs language translation services, we can identify the appropriate language. Should a customer speak a language that we can not identify, the customer is presented with a card with 38 different languages identified. Customers are instructed in their own language to point to their own language and that by doing we will be able to use a two way translation program to provide communication services.

- Professional Translation Services – MWRTA has contracted with MAPA Translation Services to ensure that documents are translated appropriately and to provide real time translation services as necessary.

MWRTA has limited costs associated with the provision of alternative language services as we use free translation software both on-line and in the production of written materials. We also, when possible, hire bi-lingual individuals that are responsible for a variety of functions not solely translation. This helps us build a diverse workforce and allows us to communicate to all members of the community. The bi-lingual staff are also available to proof-read materials to ensure that they make sense as machine translations may be literal and not reflect the document's true intent. For critical documents and when needed for real time translations, the MWRTA contracts with MAPA Translations, a professional translating service located in Framingham, Massachusetts.

Task 4, Step 2 – Determine what, if any, additional services are needed to provide meaningful access.

MWRTA is proud of our outreach to the LEP community but will continue to seek greater outreach opportunities. In-depth analysis of our communities, indicate that less than 3% of our service speaks English “not well” or “not at all.” We believe that most individuals can find information in their primary language easily and if not can request additional translated information from MWRTA staff. We are however, continually looking for ways to improve our outreach to the LEP community. MWRTA has two employees who are responsible for marketing and communication. This duo have been actively conducting outreach throughout our system area. For example, the agency sponsored a night out at a housing authority. Bi-lingual staff (Portuguese and Spanish speakers) attended the event to provide outreach to LEP individuals. The agency provided schedules, pizza, face painting and raffles to draw a crowd to the event. People were taught how to read a bus schedule and how to load fare media as well as provided with information about job training opportunities sponsored by the transit authority. Another outreach activity that was held at a housing authority was conducted in Chinese. Although this population does not reach safe harbor thresholds, MWRTA values them and actively seeks to promote transit usage among all individuals regardless of their ability to speak English.

Task 4, Step 3 – Analyze your budget

MWRTA has committed to providing LEP as an inclusive cost of our budget. LEP services are integrated into jobs with multiple functions so the hiring of multi-lingual staff provides no additional cost to the budget despite the improved value to the system as a whole. Furthermore, computerized translation services both on our website and in the production of flyers is done through free translation programs so there is no additional production costs. Bi-lingual staff proof written materials to ensure that the translations accurately reflect the information. The agency also contracts with a professional translating business MAPA

Translations to ensure that critical documents are translated appropriately and that real time translation services are available.

Task 4, Step 4 – Consider cost effective practices for providing language services

MWRTA already uses cost effective practices including some of those suggested in the DOT Guidance. Using translation software and relying on the existing skill sets of our employees regardless of job title or function, are two such ways we have adopted cost effective language services. We also work with advocates in the community to assist in outreach activities. We continually look for ways to improve outreach to this component of our community. MWRTA, however, also recognizes the value and importance of professional language services and has contracted with MAPA Translations to ensure that critical documents are translated appropriately and that language translation services are available when the agency requires them.

Conclusion

MWRTA pays close attention to the LEP needs of the Metrowest. We continually look for ways to improve our outreach to all constituents including the LEP population. MWRTA uses a combination of in-house and professional skill sets to ensure that the needs of the LEP community are addressed.

Developing an Implementation Plan on Language Assistance

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP population they serve. The DOT Guidance notes that effective implementation plans typically include the following five elements: identifying LEP individuals who need language assistance, providing language assistance measures, training staff, providing notice to LEP persons, monitoring and updating the plan.

Task 1 Identifying LEP Individuals who need language assistance

MWRTA has performed a four factor analysis of our LEP population and identified areas and languages in which there is a concentration. Overall, the service area has a population of 3% of people who speak English “not well” or “not at all.” The areas of where concentration for LEP populations exceed the area average are Framingham (7%), Milford (5%) Marlborough (4%) and Hudson (4%).

MWRTA conducts substantial outreach efforts throughout our service area. We work with local social service agencies such as housing authorities, business advocacy organizations, South Middlesex Opportunity Council (SMOC), and other organizations and community leaders to identify and attend events in the community. We believe that this strategy is very effective in reaching the LEP community. Through our outreach and research efforts with local agencies

coupled with data driven research, we have found the most commonly spoken languages by the LEP community are Portuguese and Spanish.

A table for each community by number of LEP speakers by language and percentage of the population is attached as a separate attachment to this document. It is not included in this document because of the size of the table is so big that is not legible in this format.

Task 2: Language Assistance Measures

MWRTA utilizes a variety of language assistance tools to communicate with the LEP community. Included in this “tool box” are website translation software which allows the customer or agency staff to translate information regarding our system, written notices which are posted in various languages in a variety of places to reach the intended audience and employee translators who are available to answer questions about the system. The agency also has “I speak” cards which are kept at the reception desk for use during public meetings.

If a person indicates that they speak a language that we can not translate with staff resources we will use laptops with translation functions to communicate with the individual. The agency also contracts with a professional translation service to translate critical documents and provide real time translations.

MWRTA protocol is that if a person calls who needs language assistance, the person receiving the call will determine the language to the best of his or her ability and forwards the call to the person who can best meet the callers needs. It should be noted that MWRTA phone lines are staffed by multi-lingual individuals who speak Creole, French, and Spanish. Furthermore, the paratransit call center has bi-lingual operators to assist in scheduling paratransit trips.

MWRTA has received written communication in Portuguese as a result of a system-wide survey. MWRTA used Portuguese speaking staff to translate the comments. If a response was requested, the customer would receive a response in the language in which the original communication was received.

MWRTA drivers who encounter LEP passengers whose questions they can not answer, they are instructed to radio in to the dispatch so that a staff interpreter can be found to respond to the customer’s request. Our operating company indicates that LEP riders use the system frequently – it is only occasionally that drivers need assistance in answering questions. MWRTA also contracts with a professional translation company to ensure that should additional translation assistance be required, the agency can easily access services.

Task 3: Training Staff

Operating staff and in house staff are trained on proper procedures for responding to LEP information requests. Discussions with call center and operating employees indicate that

working with LEP populations is a regular occurrence and people are aware of the proper procedures.

Task 3, Step 1 – Identify agency staff that are likely to come into contact with LEP persons as well as management staff.

The agency staff who most often interact with LEP populations are our drivers. Call takers and customer service workers also interact with LEP people on a regular basis. All MWRTA staff are also educated in LEP protocol which is to transfer the call to a person who speaks the language and can best assist the customer.

Task 3, Step 2 – Identify existing staff training opportunities

New employees are trained on LEP protocols and customer courtesy when they join the transit authority. Employees who, in the course of their jobs, have questions about LEP protocol are directed to ask their supervisor for clarification.

Task 3, Step 3 – Design and implement LEP training for agency staff.

LEP training is included as part of the hiring process for the MWRTA. LEP is also covered in the customer service component of training. Common sense prevails and when we receive calls from a person who has LEP, we find the person who can most easily converse with them both in terms of content and language skills. Over the course of this Title VI Plan update, staff were apprised of the document and questioned to determine their day to day experience with LEP and the protocols they use to address LEP needs. MWRTA continue to work with our problem-solving employees to identify additional ways that we can better conduct outreach to the community. The agency has also contracted with a professional translation service to ensure that the needs of the LEP community are addressed should an in-house interpreter not be available.

Task 4: Providing Notice to LEP Persons

Notices in dominant LEP languages are posted at the main transfer hub of the MWRTA. Passengers regularly go to the transfer hub to get information about services, add value to their passes and register for reduced fares or ID cards. The location is the primary transfer center for all bus routes in the MWRTA system. In addition to posted notices, multi-lingual staff man our customer service desk and work with customers at the hub as well as those who call in. MWRTA also posts important notices on out buses to ensure that all riders have direct notification of important issues or news affecting MWRTA including information regarding Title VI rights.

MWRTA has two employees who focus on customer outreach and marketing. The agency has implemented an aggressive community outreach program which has conducted events in low income and minority neighborhoods, community centers, schools, universities, libraries,

Councils on Aging, Community Fairs, Farmers Markets and other locations. Several of these events have had translators available to insure that customers and agency staff can readily communicate.

The agency maintains customer bulletin boards to focus attention on MWRTA matters and also works with the media to alert the public of MWRTA issues. MWRTA has worked with Portuguese-speaking media to provide better outreach to the LEP community.

Task 5: Monitoring and Updating the LEP Plan

MWRTA has updated its LEP plan to include information additional information for communities that have been added to the agency's service district since this document was last submitted. Two new communities have joined the district: Milford and Hudson. Milord and Hudson have a combined population over five years of age of 38,748. With a combined total of LEP population of 1,522. Neither community has a single LEP language which exceeds 5% of the population nor do either of the communities have more than 1,000 LEP individuals of a single language. The LEP population is part of the cumulative number of LEP speakers within the service area as a whole who require safe threshold treatment with regard to provision of information in Portuguese and Spanish.

Provision: Notifying Beneficiaries of their Rights under Title VI

Circular Reference:	Chapter IV, Part 5
Regulations or Reference:	49 CFR 21.9(d)
Reporting Requirement:	Notice of compliance with Title VI and public procedures to file a discrimination complaint

In order to comply with 49 CFR Section 21.9(d), recipients and subrecipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients and subrecipients that provide transit service shall disseminate this information to the public through measures that can include but shall not be limited to posting information on the agency's web site.

- a) Contents: the notice shall include:
 - 1. A statement that the agency operates programs without regard to race, color or national origin.
 - 2. A description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations.
 - 3. A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient or subrecipient.

- b) Effective Practices for Fulfilling Notification Requirements: In complying with the above requirements, recipients and subrecipients should keep the following guidance in mind:
 - 1. Dissemination. Agencies may inform the public of their rights under Title VI through such measures as posters, comment cards, or flyers placed at stations and in transit vehicles. The type, timing and frequency of these measures are at the recipient's or subrecipient's discretion.
 - 2. General Notification. Agencies may include a statement of nondiscrimination on the basis of race, color or national origin as part of a broader statement of its commitment to nondiscriminatory service. This broader statement can also include a commitment to nondiscrimination on the basis of characteristics not covered by Title IV, such as age, gender and disability.
 - 3. Document translation. Notices dealing with a recipient's or subrecipient's Title VI obligations and complaint procedures should be translated into languages other than English, as needed and consistent with the DOT LEP Guidance.
 - 4. Subrecipients. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the recipient; however, subrecipients should notify their beneficiaries that they may file discrimination complaints directly with the subrecipient.

MWRTA features Title VI information on its website <http://MWRTA.com>. MWRTA's website is heavily used by our customers and employees as it is the main portal for schedules, real time

bus location information and news and updates about the transit authority. MWRTA's website includes a link to babelfish a common translation software that allows the site user to translate information into 104 languages including Portuguese and Spanish – the most commonly used languages in the Metrowest Regional service area aside from English.

While MWRTA believes that our website reaches many of our customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Title VI information in key languages is posted at our main transfer hub at 15 Blandin Avenue in Framingham. At this site many of our customers transfer between buses, add value to their passes or apply for certification for various programs. The information is also posted in employee lounges for both contracted and directly employed MWRTA employees.

MWRTA includes Title VI information in its new hire orientation for both MWRTA direct hires and contracted employees. Title VI information is available to employees and customers in the preferred language of the individual.

Provision: Inclusive Public Participation

Circular Reference:	Chapter IV, Part 9
Regulations or Reference:	DOT Order 5610
Reporting Requirement:	Summary of public outreach and involvement activities undertaken since last submission and a description of steps taken to ensure that minority persons had meaningful access to those activities.

In order to integrate into community outreach activities, considerations expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, recipients and subrecipients should seek out and consider the viewpoints of minority, low-income and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

a) Effective practices for Fulfilling the Inclusive Public Participation Requirement.

Recipients and subrecipients have wide latitude to determine, how, when and how often specific public involvement measures should take place, and what specific measures are most appropriate. Recipients should make these determinations based on the composition of the population effected by the recipient's action, the type of public involvement process planned by the recipient, and the resources available to the agency. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and low-income people from effectively participating in a recipient's decision making process.

Effective practices include:

- 1) Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- 2) Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- 3) Using locations, facilities and meeting times that are convenient and accessible to low-income and minority communities.
- 4) Using different meeting sizes and formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the particular community or population.
- 5) Implementing DOT's policy guidance concerning recipient's responsibilities to LEP persons to overcome barriers to public participation.

MWRTA holds regularly scheduled meetings which are open to the public. These meetings include Board meetings to discuss policy and oversight as well as customer outreach meetings to solicit input from the riding community on their experience and how we can improve our services. Board members are elected officials from each community or their designee. Each Board meeting is held at MWRTA facilities during hours in which the transit network is running so that system users can easily access the meetings.

A table of the ethnicity of the MWRTA Advisory Board Members is shown below:

**Metrowest Regional Transit Authority
Board Member Ethnicity**

	Black American	Hispanic American	Native American	Subcontinental Asian American	Asian Pacific American	Non-minority
Ashland						X
Framingham						X
Dover						X
Holliston						X
Hopkinton						X
Hudson						X
Marlborough						X
Milford						X
Natick						X
Wayland						X
Wellesley						X
Weston						X
Sherborn						X
Southborough						X
Sudbury						X
Disabled Community Member						X

MWRTA has “I speak” forms modelled on those used by the US Census bureau so that if a person with limited English proficiency wants to contribute to the conversation a translator or translating program can be called upon. (“I speak” forms are a tool which can be used to determine a non-English speaker’s language. The forms asks a person, in their native language (as well as English translations), to check the box indicating what language they speak. The staff member collecting the form can then call up a translation software program so that they can communicate with the LEP individual). MWRTA has also contracted with a professional translation firm that can be contacted for real time translation services.

MWRTA has also implemented outreach programs for individuals to assist and train them on how to ride fixed route and paratransit services. These training sessions not only provide a

marketing and outreach opportunity for new and existing customers but also provide a feedback forum for MWRTA staff to hear how we are doing and how we can improve our service. Training sessions have been held at public housing authorities, senior centers, health fairs and disabled advocacy organizations. Training is always held during hours in which the transit system is operating and at accessible locations. MWRTA hosts training sessions at public locations or at locations which provide end user subsidies such as senior housing sites. We believe that the subsidized locations help us to reach lower income individuals who may qualify for subsidies due to income constraints. Whenever possible, the agency takes a bus on site to make the experience as practical and realistic as possible.

In addition, MWRTA participates in a wide range of community events to further expand our outreach activities. We believe that attending community events allows us to reach people who otherwise may not know about our services. MWRTA hosts on site events at public housing projects with food and prizes to increase local participation. The agency also has booths at community fairs, health fairs and farmers markets to reach people who may not necessarily attend a transportation meeting or may be unaware of our services. The agency also works with our regional Transportation Management Association to reach employees at local businesses. We have conducted outreach with translators at the Framingham Housing Authority and have partnered with Portuguese language media outlets to assist us in outreach to the LEP community.

Provision: Demographic Data Collection

Circular Reference:	Chapter V, Part 1
Regulations or Reference:	49 CFR 21.9(b)
Reporting Requirement:	Demographic maps and charts prepared since the last decennial census, results of consumer surveys that include demographic information or demographic information on beneficiaries through locally developed procedures.

1. Requirement to Collect Demographic Data. In order to comply with 49 CFR Section 2.9(b), recipients to which this chapter applies shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal Financial Assistance. FTA recommends that recipients fulfill this requirement by implementing one or more of the following three options:
 - a) Option A: Demographic and Service Profile Maps and Charts. Recipients may prepare demographic and service profile maps and charts. These maps and charts will help the recipient determine whether transit service is available to minority and low-income populations within the recipient's service area. Maps and charts should be prepared after each decennial census and prior to proposed service reductions or eliminations (per the instructions of Section 4 of this Chapter). These maps may be prepared using geographic information systems (GIS) technology, although recipients without access to GIS may prepare maps in alternate formats. The Federal Transit Administration (FTA) recommends that recipients provide the following maps and charts:
 - 1) A base map of the agency's service area that includes each census tract of traffic analysis zone, major streets and highways, fixed transit facilities (including the alignment of fixed guideways and transit stations, depots, maintenance and garage facilities, and administrative buildings) and major activity centers or transit trip generators (major activity centers and transit trip generators can include but are not limited to, the central business district, outlying high employment areas, schools, and hospitals). This map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years.
 - 2) A demographic map that plots the above information and shades those census tracts or traffic analysis zones where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population of the service area as a whole. Transit agencies may elect to produce maps that highlight separately those areas with a predominantly minority population, a predominantly low-income population and a population that is both predominantly minority and low-income, if specialized maps would assist the agency in determining compliance with Title VI. Transit agencies may also elect to produce additional maps showing the presence of individual minority populations if this information would assist the agency in determining compliance with Title VI.
 - 3) A chart for each Census tract or traffic analysis zone that shows the actual numbers and percentages for each minority group within the zone or tract and the total population for

each zone. The chart should also show the total number and percentage of low-income people within each zone or tract. Those tracts where the total minority population percentage and the total low-income population percentage exceed the system wide average for the agency's transit service area should be highlighted in the chart.

- b) Option B: Survey information on Customer Demographics and Travel Patterns. Recipients may collect information on the race, color, national origin, income and travel patterns of their riders. FTA recommends that recipients collect the following information (recipient may request additional information from their riders, as appropriate, or request different information that is more applicable to the type of service they provide):
- 1) Information on riders' race, color, and national origin.
 - 2) Whether the rider speaks or understands English "not well" or "not at all."
 - 3) Information on riders' income or income range.
 - 4) The mode of transportation service that the rider uses most frequently (when available).
 - 5) The frequency of transit usage.
 - 6) The typical number of transfers made.
 - 7) The fare payment type and media most frequently used (when applicable).
 - 8) Rider's automobile availability.
 - 9) Riders opinion of the quality of service they receive (this could include questions such as satisfaction with the system, willingness to recommend transit to others, and value for fare paid).

In administering the above option, grantees should keep the following guidance in mind:

- a) Timing. The information recommended in Section 1.b.(1) can be integrated into customer surveys routinely employed by transit agencies and can be collected at the time that such surveys are routinely performed.
- b) Language Access. The recipient should take steps to translate customer surveys into languages other than English, or to provide interpretation services in the course of conducting customer surveys consistent with the DOT LEP guidance.
- c) Option C: Locally Developed Alternative. Recipients may modify the above options or develop their own procedures to collect and analyze demographic data on their beneficiaries. Any locally developed alternative shall meet the expectation of 49 CFR Section 21.9(b).

Option C – MWRTA had the following maps and data chart created to document demographics in our service area per the suggested Option A criteria.

The following maps show demographic data for the MWRTA service area as it relates to Title VI requirements.

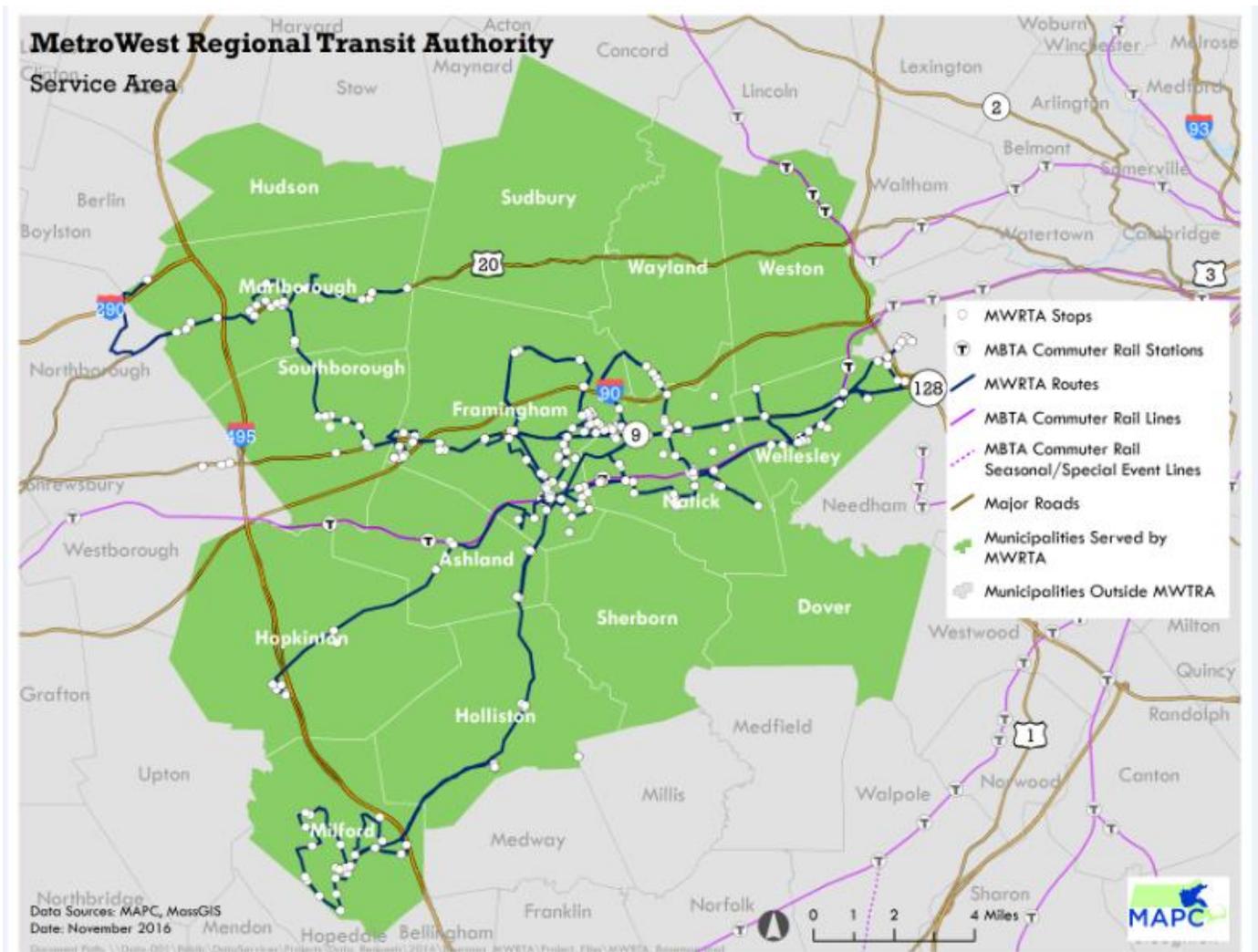
The first map provides a base map of MWRTA services.

The second map (Map 2) is a demographic base map which uses Map 1 as a base map and highlights census tracts where individuals are below the poverty level.

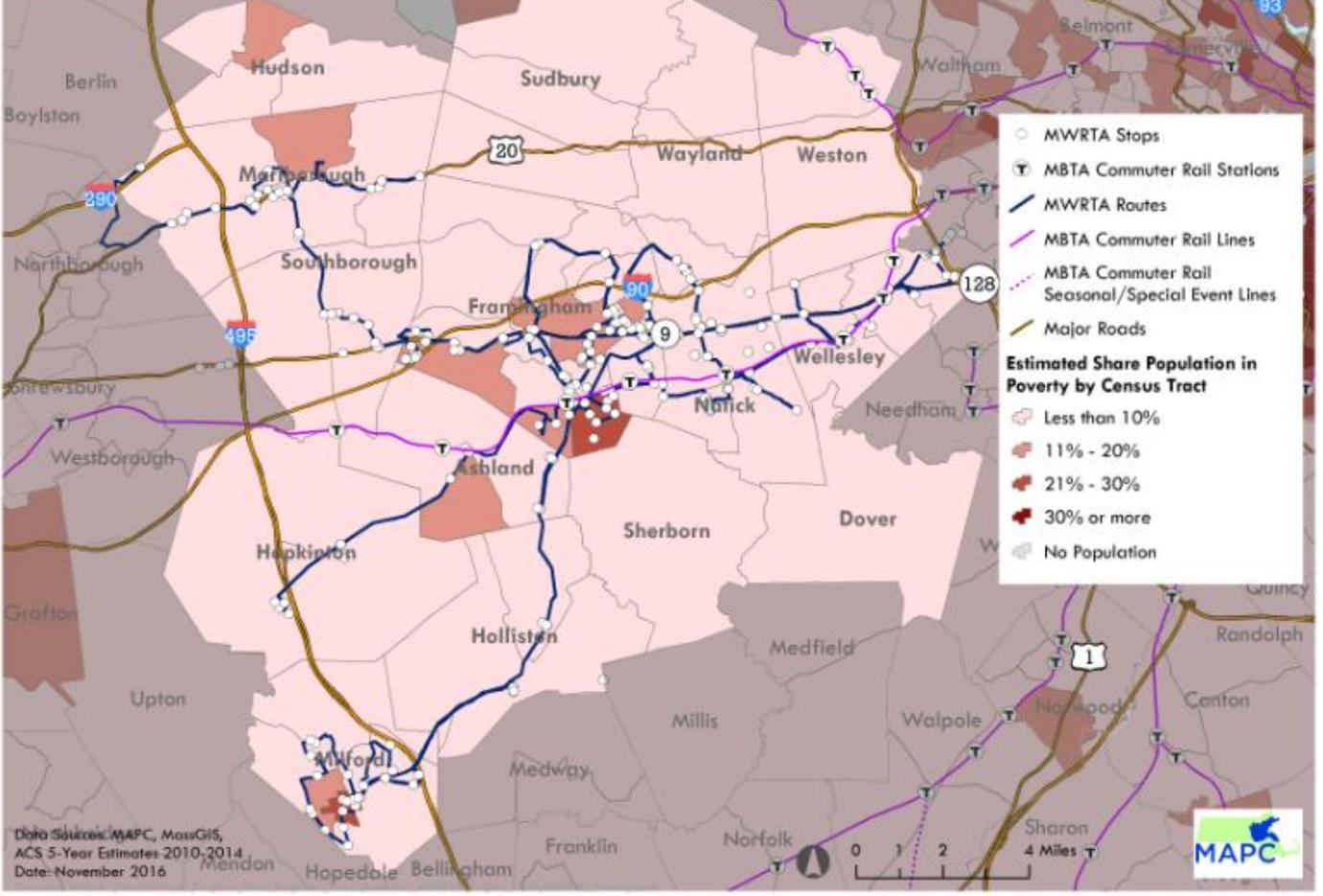
Map 3 uses Map 1 as a base and highlights census tracts where the percent minority exceeds the average minority population of the service area as a whole.

Map 4 uses Map 1 as a base map and highlights census tracts where the percentage of LEP population exceeds the average LEP of the service area as a whole.

Following the demographic maps, MWRTA has included a table with the number and percentage of low-income, minority and LEP populations. Tracts where the percentages of these characteristics exceed the service area as a whole are highlighted.

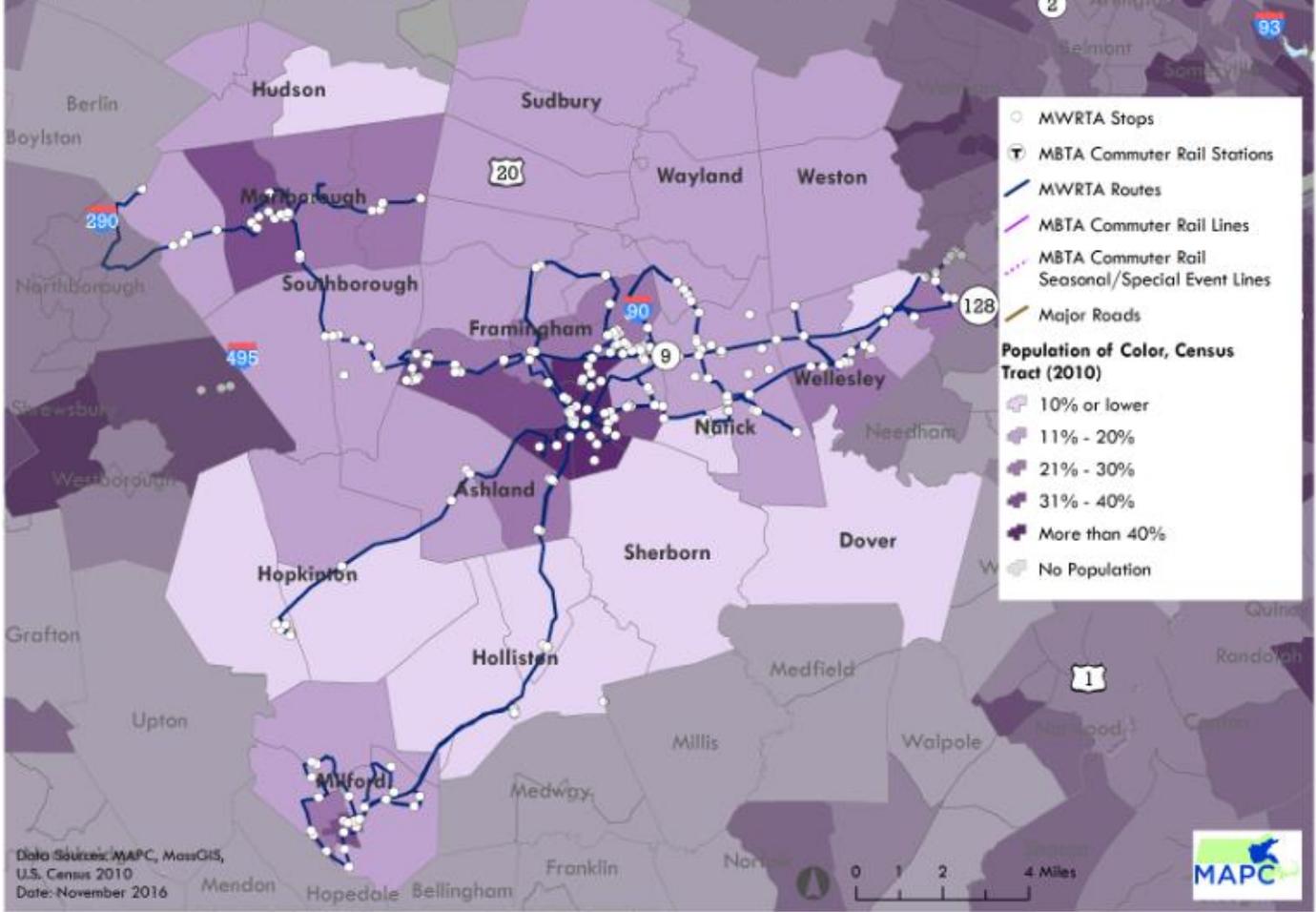


MetroWest Regional Transit Authority
Estimated Share Population in Poverty
By Census Tract, 2010-2014 Estimates

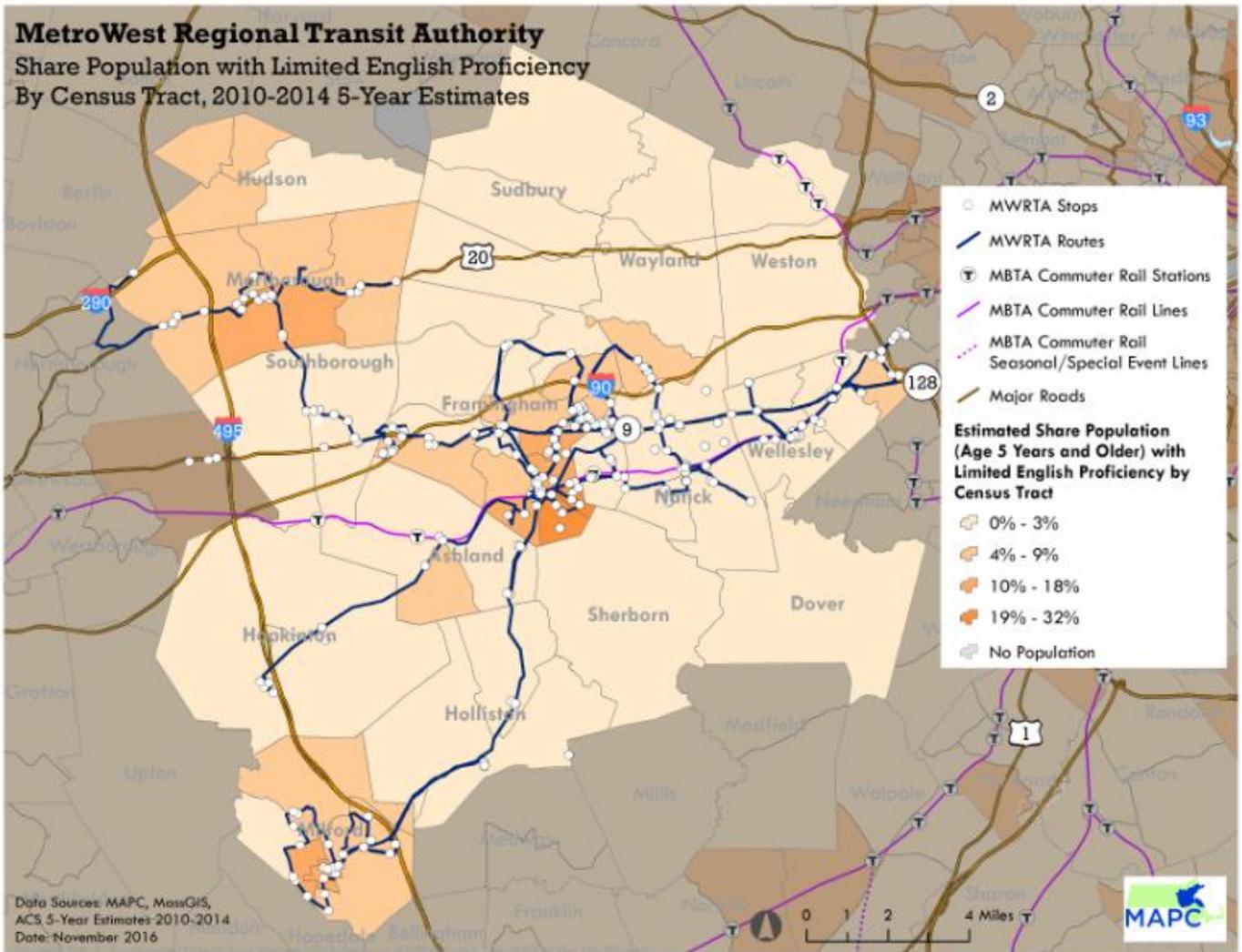


MetroWest Regional Transit Authority

Population of Color, by Census Tract, 2010



MetroWest Regional Transit Authority
Share Population with Limited English Proficiency
By Census Tract, 2010-2014 5-Year Estimates



Census Tract	Census 2010 Population	Total Minority Population	% Minority Population	Estimated % Population in Poverty	Estimated % Population Limited English Proficiency
25017320102	5040	448	8.89	1.73	0.18
25017320103	2795	332	11.88	4.39	0.62
25017320104	7090	458	6.46	1.63	0.58
25017321100	6992	1449	20.72	6.30	4.56
25017321200	6267	1486	23.71	5.86	11.04
25017321300	7497	2295	30.61	9.61	14.39
25017321400	3297	469	14.23	1.72	3.85
25017321500	6898	2099	30.43	6.61	4.21
25017321600	7548	1748	23.16	10.36	5.51
25017322100	4671	336	7.19	2.10	1.52
25017322200	3687	417	11.31	4.11	8.13
25017322300	6090	855	14.04	8.31	9.04
25017322400	4615	510	11.05	10.16	7.07
25017365100	7732	821	10.62	0.71	0.64
25017365201	5607	584	10.42	3.20	0.48
25017365202	4320	475	11.00	2.25	1.81
25017366100	4697	867	18.46	6.56	3.52
25017366201	3598	405	11.26	1.02	0.00
25017366202	4699	640	13.62	4.46	0.82
25017367100	3959	617	15.58	3.18	2.65
25017367200	7302	1251	17.13	2.72	1.29
25017382100	4911	712	14.50	3.26	1.00
25017382200	5158	599	11.61	1.56	0.32
25017382300	5568	586	10.52	6.18	0.52
25017382400	4523	360	7.96	5.48	1.70
25017382500	4418	618	13.99	3.25	1.86
25017382601	4269	1307	30.62	6.29	3.31
25017382602	4159	635	15.27	1.60	0.37
25017383101	4217	2531	60.02	29.88	26.48
25017383102	4923	3782	76.82	29.41	25.07
25017383200	6046	3117	51.55	15.77	9.99
25017383300	3042	1049	34.48	9.58	5.60
25017383400	5540	2659	48.00	8.27	15.43
25017383501	4259	1795	42.15	14.15	10.43

25017383502	3773	792	20.99	7.17	1.14
25017383600	6138	1717	27.97	16.61	4.83
25017383700	5213	1122	21.52	3.11	5.51
25017383800	5360	937	17.48	2.29	3.18
25017383901	7628	1026	13.45	4.23	0.91
25017383902	5227	844	16.15	2.19	2.16
25017384001	1437	345	24.01	2.87	1.13
25017384002	5515	1977	35.85	13.34	4.52
25017385100	6717	996	14.83	2.22	0.23
25017385201	2568	510	19.86	13.42	7.85
25017385202	7308	1557	21.31	2.60	3.22
25017386100	4119	274	6.65	2.02	0.00
25017387100	4257	252	5.92	5.04	0.35
25017387201	5464	417	7.63	3.39	1.42
25017387202	3826	233	6.09	3.66	0.34
25021404100	4025	986	24.50	4.38	4.65
25021404201	3658	318	8.69	1.84	0.03
25021404202	4986	967	19.39	2.86	1.63
25021404301	5508	686	12.45	4.33	1.14
25021404302	3529	569	16.12	3.25	1.26
25021404400	6276	1395	22.23	3.58	1.84
25021405100	5589	490	8.77	0.30	0.44
25027741101	4478	577	12.89	4.49	1.39
25027741102	5289	785	14.84	2.36	0.32
25027744101	7445	953	12.80	8.68	4.05
25027744102	5258	649	12.34	8.41	1.34
25027744200	7484	1319	17.62	6.63	4.48
25027744300	3838	1169	30.46	25.02	14.62
25027744400	3974	805	20.26	10.94	10.03

6.31% Poverty %
19.60% Minority
4.26% Average
LEP

Definitions:

Low Income: Individuals from households below the poverty level, for the population for which poverty status is determined.

Limited English Proficiency (LEP): speaks English "not well" or "not at all".

LEP data are estimates from the American Community Survey. Percent LEP represents the estimated percent of those that are Limited English Proficient. There is 90% confidence that the actual values fall within the upper and lower bounds.

Source:

Low-income: Census 2010, SF3.

Minority: Census 2010.

Limited English Proficiency: American Community Survey, 2010-2014, 5-year data.

Low-income, minority, and/or LEP tracts above regional average.

Provision: Service Standards

Circular Reference:	Chapter V, Part 2
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Systemwide Service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security)

- 1) Vehicle load – Vehicle load can be expressed as the ratio of passengers to the number of seats on a vehicle during a vehicle’s maximum load point. Vehicle load is generally measured at peak and off-peak times and on different modes of transit. When recipients observe that vehicle load on certain routes is consistently exceeding its service standard, they should consider adding additional vehicles or expanding capacity of vehicles serving that route. Recipients may set different vehicle load standards for peak and off peak times and for different modes of transit service.

The MWRTA is a suburban transit system which has limited capacity problems on its vehicles. The fixed route fleet is currently comprised of 32-16 passenger mini-buses and ridership on the vehicles is such that capacity constraints occur inconsistently on a few prime time commuter runs. MWRTA monitors ridership on a daily basis and for routes with the highest ridership, has added service to encourage greater usage.

MWRTA Service Standard for Vehicle Load

MWRTA passengers will have a seat available to them except in instances of peak periods in which it is acceptable for passengers to stand on the vehicle. Passengers are asked to hold packages in their laps during peak periods to ensure that as many seats as possible are available.

- 2) Vehicle Headway - Vehicle headway is the time interval between two vehicles travelling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a component of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak and off peak service as an increment of time (e.g. peak: every 15 minutes; and off-peak: every 30 minutes). Recipients may set different vehicle headway standards for different modes of transit service (such as bus, rail, bus rapid transit, and commuter rail). A vehicle headway policy might establish a minimum frequency of service based on population density. For example, a 15 minute peak and 30 minute off-peak service might be the standard for routes serving the most densely populated portions of the service area. Thirty (30) minute peak hour service might be the standard in less densely populated areas. Headway policy is typically related to vehicle load. For

example, a policy might state that service frequency will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

MWRTA's goal is to provide service at intervals that are conducive to encouraging the public to use public transit as a viable alternative to a private automobile. Presently MWRTA vehicle headways are determined by funding availability and ridership. On those routes with the highest ridership, MWRTA operates more frequent service and those routes which are commuter based have schedules based on peak commuting hours. MWRTA has a goal of getting to 60 minute and 30 minute headways (based on ridership demand) across its system however service levels will be determined by funding availability.

MWRTA Service Standard for Vehicle Headways

MWRTA routes will be operated on regular intervals based on ridership and route purpose (i.e. commuter based versus trunk lines).

Based on funding availability, routing, and ridership, MWRTA strives for a minimum of hourly service on all routes with the exception of special purpose trips, such as commuter based trips in which limited frequency is appropriate, or on lifeline service which is provided as no alternative service is available and ridership does not justify additional resources.

- 3) On-time Performance - On time performance is a measure of runs completed as scheduled. This criterion must define what is considered "on time." For example, it may be considered acceptable if a vehicle completes a scheduled run within five minutes of the established schedule. The percentage of times that vehicles on a particular route or line complete runs within this standard is then measured. An acceptable level of performance must be defined. For example, an agency might define on time as 95% of all runs on a particular route or line completed within the allowed on time window (e.g. five minutes).

MWRTA defines a vehicle as being on time if it leaves the transit hub within 15 minutes of its scheduled time. MWRTA's service standard is that 85% of all of its trips will be "on-time." The service standard was developed taking into account the capricious nature of New England weather as well as the agency's operating environment which includes heavily congested commercial roadways which often times experience significant delays to traffic flow, particularly during peak commuter hours.

MWRTA Service Standard for On time Performance

MWRTA's service standard is defined as 85% of its trips leave the transit hub within 15 minutes of the scheduled trip time.

- 4) Distribution of Transit Amenities - Transit amenities refer to items of comfort and convenience available to the general riding public. These items include, but are not

limited to, benches, shelters, route maps, timetables, trash receptacles, and intelligent transportation systems (such as electronic fare payment and vehicle arrival information displays) along bus routes and at fixed guideway stations and elevators. Transit agencies may set different service standards for different modes of service that they provide. Policies or standards in this area address how these amenities are distributed within a transit system and the manner of their distribution determines whether transit users have equal access to these amenities. Standards for the installation of transit amenities along bus routes are often based on the number of passenger boardings that occur at stops along the routes. Transit agencies should not set standards for amenities such as bus shelters that are solely installed and maintained by a separate jurisdiction, such as a municipality. Transit agencies should set standards for amenities such as bus shelters that are installed and maintained under contract between the transit authority and the private entity. In these cases, the transit agency should communicate its service standard to the private entity.

The MWRTA has identified the following transit amenities: ITS equipment including “Charlie Card” fareboxes and global positioning systems (GPS) that provide real time vehicle location to customers online, bus shelters and signage. MWRTA requires all vehicles to be equipped with the same level of amenities including ITS equipment and fareboxes.

MWRTA currently owns, two bike racks and three benches all of which are located at the agency’s transit hub at 15 Blandin Avenue in Framingham, MA. Our transit hub is located in an environmental justice neighborhood with a high proportion of minorities and low incomes.

MWRTA has identified the expansion of passenger amenities as a priority for the future. It is our belief that passengers will benefit from a more comfortable transit experience. Amenities will be distributed based on the number of passengers at a location, ADA spatial requirements and our ability to secure the right to install the sign or shelter by the municipality or property owner. MWRTA does not own shelters but rather encourages communities to install and maintain them.

MWRTA Service Standard for Distribution of Transit Amenities

MWRTA requires that all vehicles have consistent amenities when placed in service including ITS capabilities such as real time gps and fareboxes that accept “Charlie Card” fare media.

MWRTA does not own any shelters or benches other than those located at the agencies hub at 15 Blandin Avenue in Framingham. MWRTA has initiated a signage plan which is installing bus stop signs at locations with high boardings. Sign locations are negotiated with the business or community.

- 5) Service Availability – Service availability is a general measure of the distribution of routes within an agency’s service area. For example, a policy might be to distribute service so that 90 percent of all residents in the service area are within one quarter mile

of bus or rail service. A policy might also indicate the maximum distance between stops along bus routes. These measures of coverages and stop distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distances might be a shorter distance than it would be in suburban or rural areas. In less densely populated areas, the percentage of total population within one fourth mile to routes or lines might also be lower. Commuter rail availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations. The standard of policies covering this area apply to the existing services as well as proposed changes in the levels of service (e.g. expansion, addition, or deletion of routes).

MWRTA service is financed through a combination of resources: Federal, State and Local. Decisions to add new service are contingent upon a number of factors, including a local community's ability to provide operating funds for the proposed service. In determining new services, MWRTA considers need, potential ridership, available funding, origins and destinations.

Currently, all of our routes provide flag down service.

MWRTA Service Standard for Service Availability

MWRTA member communities determine the level of service provided in their area by the level of financial support they provide to the MWRTA. MWRTA will determine within those towns routing to ensure that service is provided equitably.

MWRTA services will travel primarily on main roads, however, at the request of a passenger, the bus can deviate within a short distance of the route. Routes are designed to be in tune with potential trip origins or destinations including group homes, senior centers, employment centers, shopping, medical, educational or recreational facilities. High density areas, low income areas, or areas with high levels of transit dependent populations, will be given consideration and preference in routing decisions.

Provision: Service Policies

Circular Reference:	Chapter V, Part 3
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Systemwide Policies (such as policies for vehicle assignment or transit security)

In order to comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, recipients to which this chapter applies shall adopt systemwide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessarily based on a quantitative threshold.

1. Vehicle assignment. Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and routes throughout the system. Policies for vehicle assignment can be based on the age of the vehicle, for example, a recipient may have a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system average. The policy could also be based on the type of vehicle. For example, an agency could assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, certain types of vehicles could be assigned for express or commuter service. Agencies deploying vehicles equipped with technology designed to reduce emissions may set a policy for how these vehicles will be deployed throughout the service area. For example, a policy could be to distribute vehicles so that the level of emissions per bus at each depot is comparable.

All MWRTA fixed route vehicles and paratransit vehicles are assigned to one bus garage. Buses are randomly assigned to routes to ensure that buses receive equal wear and tear (mileage) and that vehicles are disbursed throughout the entire service area without prejudice. This system also reduces driver complaints over his or her vehicle assignment.

For paratransit service, vehicles are randomly scheduled with the exception of type of vehicle and whether a customer has a restriction to only use a particular type of vehicle such as a sedan or van. Being assigned solely to one type of vehicle requires a doctor's sign-off that one vehicle type is preferable to another due to a physical or mental constraint.

MWRTA Service Policy for Vehicle Assignment

MWRTA rotates its fixed fleet throughout each of the routes to ensure that mileages on each vehicle are roughly equivalent and that all vehicles operate on all routes.

For paratransit service, computer software randomly assign trips to vehicles based on customer vehicle type need (van versus sedan) and routing efficiency.

2) Transit security – Transit security refers to measures taken to protect a recipient's employees and the public against any intentional or threat of violence or personal harm, either from a criminal or terrorist act. These actions include, but are not limited to, deploying surveillance technology and security personnel along routes and stations, implementing security training programs for employees and security awareness programs for the public, and conducting inspections of facilities and passengers. Decisions to provide a greater level of security at some but not all of the recipient's fixed guideway stations in the area or along some but not all of a recipient's transit routes should be based on neutral criteria such as assessment of threats to facilities, data showing higher levels of criminal activities at certain facilities or in vehicles travelling along certain routes, or objective information that leads officials to believe that certain facilities or routes are more likely to be at risk. Policies associated with observing suspicious activity should ensure that suspicious activity is observed without regard to race, color, or national origin.

MWRTA takes security issues seriously as it is responsible for the security of its passengers, personnel and assets. As such, MWRTA implements security measures that protect these assets without regard to the area or demographic characteristics of the population in which the asset is located. Physical assets are protected at their permanent garaging location as well as while in use. Passengers, personnel and assets are protected through the use of stationary and mobile security devices such as cameras and mobile i-drive on board cameras. The agency's transit hub has additional safety equipment including alarms and fire suppression systems.

MWRTA Service Policy for Transit Security

MWRTA has installed and will maintain security equipment to protect its personnel and assets at its transportation depot including cameras and security systems (alarms, fire suppression systems). Images from the facility camera systems shall be kept on file for a period of at least two weeks.

All MWRTA vehicles are equipped with i-drive cameras that are automatically activated in case of an accident or upon manual activation by the driver in case of an on-board incident. The cameras record any accident or incident with real time images of the events to be used in investigation of the event. Incident-based images from the camera systems are kept on file for a period of at least two weeks.

MWRTA maintains continuous feed recording devices on all vehicles that capture audio and video.

Provision: Equity Evaluation of Service and Fare Changes

Circular Reference:	Chapter V, Part 4
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Analysis of impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall evaluate significant systemwide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. The recipient should have established guidelines or thresholds for what it considers a “major” change to be. Often, this is defined as a numerical standard, such as a change that affects 25 percent of the service hours of a route. FTA recommends that recipients evaluate the impacts of their service and/or fare changes using one of the following two options:

Option A: Recipients are encouraged to evaluate the impacts of proposed service and fare changes according to the following procedures:

1. Assess the effects of the proposed fare or service change on minority and low income populations.
 - a) Route Changes: For proposed major service changes that would reduce or expand frequency of service or add or eliminate routes, the recipient should produce maps of the routes that would be eliminated, reduced, added or expanded, overlaid on a demographic map of the service area, that highlights those Census tracts or traffic analysis zones where the total minority and low income population is greater than the service area average.
 - b) Span of service: For the proposed changes that would reduce or expand hours and days of service, the recipient should analyze any available information generated from ridership surveys that indicate whether minority or low income riders are more likely to use the service during the hours and/or days that would be eliminated.
 - c) Fare Changes: For proposed fare changes that would increase or decrease fares on transit modes or by fare payment type or payment media, the recipient should analyze any available information generated from ridership surveys indicating whether minority or low-income riders are more likely to use the mode of service, payment type, or payment media that would be subject to the fare increase.
2. Assess the alternatives available for people affected by the fare increase or major service change.

- a) Service Changes: For proposed service changes, the recipient should analyze what if any modes of transit or transit routes are available for people affected by the service expansions or reductions. This analysis should compare the travel time and cost of the current route with the travel time and cost to the rider of the alternatives.
 - b) Fare changes: For proposed fare changes, the recipient should analyze what, if any, alternative transit modes, fare payment types, or fare payment media are available for people affected by the fare change. This analysis should compare the fares that are paid under the change with fares that would be paid through available alternatives.
3. Describe the actions the agency proposes to minimize, mitigate, or offset any adverse effects of proposed fare and service changes on minority and low-income populations.
 4. Determine, which, if any of the proposals under consideration would have a disproportionately high and adverse effect on minority and low-income riders. Recipients can implement a fare increase or major service reduction that would have disproportionately high and adverse effects provided that the recipient demonstrates that the action meets a substantial need that is in the public's best interest and that alternatives would have more severe adverse effects than the preferred alternative.

Option B: Locally Developed Evaluation Procedure. Recipients have the option of modifying the above option or developing their own procedures to evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. This locally developed alternative shall include a description of the methodology used to determine the impact of the service and fare change, a determination as to whether the proposed change would have discriminatory impacts, and a description of what, if any action was taken by the agency in response to the analysis conducted.

MWRTA defines a "major service change" as the addition of any new bus route or removal of any bus route which has been in service more than three years. MWRTA allows all routes to be adjusted within the first three years of service to iron out routing or schedule issues. In addition, three years is the MWRTA trial period for "pilot program" routes. Several of MWRTA's bus routes were initially developed as pilot programs which are funded with temporary resources such as Jobs Access Reverse Commute (JARC) or Congestion Mitigation Air Quality (CMAQ) funds. At the end of the trial period, MWRTA will meet with local communities who may provide long term and sustainable funding to the route to determine if the route will continue to be funded.

In the event of future changes to routing or fares, the MWRTA would adopt Option B: Locally Developed Evaluation Plan. Steps in this plan are outlined below:

Equity Evaluation to Route Changes:

MWRTA allows routes a three year trial period during which time any new route may be modified to accommodate minor changes to the running time or routing based on operational experience. After this time period is complete, the route is presented to the local MWRTA community who will determine if they will fund the route based on information regarding demographics, ridership and the location it serves. Local communities must make the ultimate decision if a route remains in existence as they provide funding for the services.

Major changes are defined as changes to the route of more than 25% of service hours or miles require a more thorough assessment. These changes must be examined to determine the potential impact on minority or low income populations. MWRTA uses census information as well as knowledge of local low-income geography such as the location of subsidized housing or low-income resources such as clinics to assess the impact of such changes. MWRTA will take into consideration accessibility and alternative transportation options as part of the decision making process. MWRTA meets pro-actively with community leaders to discuss the changes to community program locations to ensure that we serve places of interest to our passengers.

MWRTA has a Director of Community Relations & Outreach who interacts with MWRTA committee members to ensure open communication for these purposes.

Equity Evaluation of Changes to the Fare Policy:

MWRTA will assess how changes to the fare policy will affect minority and low-income communities in comparison with non-minority or higher income communities to ensure that the burden does not unfairly target minority or low-income riders. Steps may include determining the validity of “zones” and their geographic definition or the use of discounted multi-ride passes.

MWRTA presently has a single bus fare for all bus routes. Full Adult cash fare is \$1.50 and Charlie Card rates are \$1.25. The agency increased Charlie Card rates from \$1.10 per trip to \$1.25 per trip effective July 1, 2015. The increased fare was considered equitable across all riders including minority and low income riders as the increase was applicable to all Full Adult Fare riders using Charlie Cards. Fares for seniors, low income and student remain the same.

Provision: Monitoring

Circular Reference:	Chapter V, Part 5
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Results of either level of service monitoring, quality of service monitoring, analysis of customer surveys or locally developed monitoring procedure.

In order to comply with 49 CFR Section 21.5(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall monitor the transit service provided throughout the recipient's service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision making is equitable service. Monitoring shall be conducted at a minimum of once every three years. If a recipient's monitoring determines that prior decisions have resulted in disparate impacts, agencies shall take corrective action to remedy the disparities. FTA recommends that recipients fulfill this requirement by implementating to least one of the following four service monitoring procedures:

Option A: Level of Service Methodology

- 1) Recipients should select a sample of bus routes and (if applicable) fixed guideway routes that provide service to a demographic cross-section of the recipients population. A portion of the routes in the sample should be those routes that provide service to predominantly minority and low-income areas. Recipients should bear in mind that the greater the sample size, the more reliable the results.
- 2) Recipients should assess the performance of each route in the sample for each of the recipient's service standards and policies.
- 3) Recipients should compare the transit service observed in the assessment to the established service policies and standards.
- 4) In cases in which observed service does not meet the stated service policy or standard, recipients should determine why the discrepancy exists and take corrective action to correct the discrepancy.

Option B: Quality of Service Methodology

- 1) Recipients should identify an appropriate number of Census tracts or traffic analysis zones that represent a cross-section of the recipients populaton. A portion of this sample should include census tracts of traffic analysis zones where minority and/or low-income residents predominate. Recipients should keep in mind that the greater the sample size the more reliable the results.
- 2) Recipients should identify the most frequently traveled destinations for riders usng the recipients's service.

- 3) For each of the three most frequently traveled destinations, recipients should compare the average peak hour travel time to destination, average non-peak hour travel time to destination, number of transfers required to reach the destination, total cost of the trip to reach the destination, and cost per mile of trip to the destination for people beginning the trip in the selected census tracts to traffic analysis zones.
- 4) If disparities exist in any of these factors along the trips to any of the destinations analyzed, recipients should determine whether the differences are significant. FTA recommends that recipients employ standard statistical tests for significance to make this determination.
- 5) If significant disparities in one or more quality of service indicators have been confirmed, recipients should determine why the disparity exists and take corrective action to correct the disparity.

Option C: Title VI Analysis of Customer Surveys

- 1) For their most recent passenger survey, recipients should compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets, and the responses of those who identified themselves as white and/or middle and upper income brackets.
- 2) To the extent that survey data is available, recipients should determine whether the different demographic groups report significant differences in the travel time, number of transfers, and overall cost of the trip or if different demographic groups gave significantly different responses when asked to rate the quality of service, such as their satisfaction with the system, willingness to recommend transit to others and value for fare paid.
- 3) If the agency concludes that different demographic groups gave significantly different responses, it should take corrective action to address the disparities.

Option D: Locally Developed Alternative

Recipients have the option of modifying the above options or developing their own procedures to monitor their transit service to ensure compliance with Title VI. Any locally developed alternative should be designed to ensure the agency's service meets the expectations of 49 CFR Part 21 as illustrated by the example in Appendix C of the same, which provides that "no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of service of transportation service furnished as part of the project on the basis of race, color, or national origin."

Option C – Title VI Analysis of Customer Surveys

MWRTA surveyed passengers on Route 1, a commuter based trip which serves a higher income ridership and Route 7 which is used by a lower income population. The results of the survey are summarized in the following table:

	Route 1 (High Income)	Route 7 (Low Income)
<u>Rider Reported Income</u>		
Household Income < \$30K	26.2%	69.0%
Household Income > \$80K	29.2%	5.7%
<u>Gender</u>		
Female	35%	56%
Male	65%	44%
<u>Use</u>		
Work	74.2%	39.0%
Shopping	12.1%	41.5%
Medical	4.6%	2.4%
School	1.5%	4.9%
Other	7.6%	12.2%
<u>Quality of Service (Scale of 1 good to 3 poor)</u>		
Reliability	1.3	1.5
Courtesy	1.2	1.2
Frequency	1.7	1.6
Travel Time	1.4	1.3
Number of Weekday Trips:	15	18
Hours of Operation:	5:45 am to 8:15 pm No mid-day service	5:45 am to 7:55 pm
Saturday Service	NA	8:30 am to 4:30 pm
Full Adult Fare:	\$1.50 or \$3.00 (Woodland)	\$1.50
Most Desired Improvement	More Frequent Service	Later Service

The Route 7 carried passengers from a significantly lower income demographic than the Route 1. Sixty-nine percent of its riders were from households with an annual income of less than \$30,000. The Route 1 carried 26.2% of its passengers who were from households with incomes less than \$30,000. Furthermore, Route 7 carried a higher proportion of women (56% to 35%) than the Route 1.

The routes had similar levels of weekday service. The Route 1 had 15 daily trips whereas the Route 7 operated 18 trips per day. Route 1 has a mid-day gap in service. The Route 7 also has service from 8:30 am to 4:30 pm on the Saturdays whereas the Route 1 has no weekend service.

Route 1 and Route 7 serves different communities. Route 1 serves Framingham, Natick and Wellesley to the Woodland MBTA station in Newton. Route 7 travels between Framingham and

Marlborough. Both routes traverse towns with similar levels of minority residents – Route 1 is 20% minority/80% white only and Route 7 is 21% minority/79% white only. Route 1 has fewer low income residents 6.3% whereas 8% of the residents along Route 7 are low income.

A summary of the survey results indicates that riders using the Route 7 are lower income than the Route 1 riders. However, in comparing service indicators the Route 7 has more service and is rated higher than the Route 1 for frequency and travel time. The Route 1 was rated higher than the Route 7 for reliability. MWRTA comparison of these routes indicates that they have similar levels of service quality.

MWRTA is currently working with CTPS to study and evaluate the MWRTA's existing fixed route service, including schedule adherence data performance and ridership. In addition, CTPS will assist MWRTA to identify and analyze necessary transit route improvements and changes for the MetroWest Region.

APPENDIX A

Title VI Complaint Policy in English, Spanish and Portuguese

Title VI Complaint Policy

If you feel you have been discriminated against by MWRTA staff/contractors or service provided by the agency, please contact the MetroWest Title VI Officer - Eva Willens at 508-935-2222. Ms. Willens will ask you to submit your complaint in writing using the form provided. Please include as much information as possible including date, time and location of the incident. Ms. Willens will investigate the complaint and get back to you within two weeks.

If the investigation and resolution do not satisfy you, you have the right to appeal by contacting the agency Administrator, Ed Carr who will provide a determination and a proposed resolution on the matter within a two week period. The MWRTA Transit Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration at 617-494-2055 for further determination. When contacting the FTA please refer to Title VI complaints.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is our goal to work with you to ensure that all people are treated fairly in the provision of federally funded transit services.

Título VI de las reclamaciones

Si usted siente que ha sido discriminado por el personal MWRTA / contratistas o servicio prestado por la agencia, por favor ponte en contacto con el MetroWest título oficial de VI - Eva Willens al 508-935-2222. La Sra. Willens le pedirá que presente su queja por escrito en el formulario previsto. Por favor, incluya tanta información como sea posible, incluyendo la fecha, hora y lugar del incidente. La Sra. Willens investigará la denuncia y en contacto con usted dentro de dos semanas.

Si la investigación y la resolución no le satisface, usted tiene el derecho de apelar en contacto con la administradora de la Agencia, Ed Carr, que proporcionará una determinación y una propuesta de resolución sobre el asunto dentro de un período de dos semanas. El MWRTA Tránsito Administrador puede ser contactado en 508-935-2222.

Si te quedas satisfecho con la determinación y la resolución de su queja por el MWRTA, que se pongan en contacto con la Administración Federal de Tránsito en 617-494-2055 para la determinación posterior. Cuando se comunique con el TLC por favor, consulte el Título VI quejas.

MWRTA no tolera la discriminación por cualquiera de sus empleados o contratistas. Nuestro objetivo es trabajar con usted para asegurar que todas las personas reciban un trato justo en la prestación de los servicios de transporte de fondos federales.

Título VI da Política Reclamação

Se você sente que tem sido discriminado por MWRTA funcionários / contratados ou serviços prestados pela agência, entre em contato com o gestor MetroWest Título VI - Eva Willens em 508-935-2222. Ms. Willens vai pedir para você enviar a sua reclamação por escrito no formulário próprio. Por favor, inclua o máximo de informações possíveis, incluindo data, hora e local do incidente. Ms. Willens vai investigar a queixa e voltar para você em duas semanas.

Se a investigação e resolução de não satisfazê-lo, você tem o direito de apelar em contato com a agência de Administrador, Ed Carr, que irá proporcionar uma determinação e uma proposta de resolução sobre o assunto dentro de um período de duas semanas. O MWRTA Trânsito administrador pode ser contactado em 508-935-2222.

Se você ficar insatisfeito com a determinação e resolução de sua queixa pela MWRTA, que são incentivados a contactar a Administração Federal de Trânsito em 617-494-2055 para a nova determinação. Ao contatar o TLC consulte queixas Título VI.

MWRTA não tolera a discriminação por qualquer de seus empregados ou terceiros contratados. É nosso objetivo de trabalhar com você para garantir que todas as pessoas são tratadas de forma justa na prestação de serviços de trânsito financiados pelo governo federal.

**APPENDIX B
TITLE VI COMPLAINT FORM**

Title VI of the 1964 Civil Rights Act states that “no person in the United States shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel that you have been discriminated against by the MetroWest Regional Transit Authority or any of its employees, please submit the following complaint form so that we may investigate the claim.

Send the completed form to:

Eva Willens
Metrowest Regional Transit Authority
15 Blandin Avenue
Framingham, MA 01702

eva@mwrta.com

Telephone: 1-508-935-2222

1. Name _____

Address _____

Phone _____ Email _____

2. Does your complaint concern:

_____ Discrimination in the delivery of services

_____ Discriminatory actions towards you or another individual

On what basis do you believe the discrimination took place:

_____ Race/Ethnicity _____

_____ Color _____

_____ National Origin _____

3. What is the best way to contact you regarding this claim?

4. On what date did the alleged discrimination occur?*

*We request that complaints be filed within 180 days of the incidence.

5. Please provide a detailed account of the alleged discrimination including who was involved, where it occurred and why you believe it happened. Please attach additional pages if necessary.

6. List any witnesses and their contact information that we may contact for additional information.

7. How would you like this problem to be resolved?

Appendix D

Vital Documents for Safe Harbor Limited English Proficiency Compliance

MWRTA has determined the following documents are Vital Documents for people with Limited English Proficiency:

Title VI Notification of Rights

ADA Application for Determination Parts A and B

ADA Ride Guide

Updated versions of each document in Safe Harbor Languages are available in Portuguese and Spanish.