



BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

Stephanie Pollack, MassDOT Secretary and CEO and MPO Chair
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WORK PROGRAM

MBTA 2020 TRIENNIAL TITLE VI REPORT

JUNE 20, 2019

Proposed Motion

The Boston Region Metropolitan Planning Organization (MPO) votes to approve this work program.

Project Identification

Unified Planning Work Program (UPWP) Classification

Agency and Other Client Transportation Planning Studies and Technical Analyses

Project Number 11424

Client

Massachusetts Department of Transportation, Office of Diversity and Civil Rights

Client Supervisor: John Lozada

Project Supervisors

Principal: Katie Pincus Stetner

Manager: Bradley Putnam

Funding Source

Future MBTA Contract

Schedule and Budget

Schedule: 15 months from notice to proceed

Budget: \$139,632

Schedule and budget details are shown in Exhibits 1 and 2, respectively.

This budget was developed using a billing overhead rate of 99 percent as approved by the Boston Region MPO for state fiscal year (SFY) 2019. Beginning with July 1, 2019, and each July 1 thereafter, the overhead rate will be adjusted to reflect the SFY rate approved by the MPO.

Relationship to MPO Work

This study is supported in full with non-MPO funding. Committing MPO staff to this project will not impinge on the quality or timeliness of MPO-funded work.

Background

Every three years, the MBTA is required to submit a report to the Federal Transit Administration's (FTA) Office of Civil Rights detailing the MBTA's efforts to comply with Title VI of the Civil Rights Act of 1964. The purpose of this Title VI report is to ensure that, as a recipient of federal funds, the MBTA provides a comparable level and quality of transportation services to all customers without regard to race, color, or national origin. The requirements for demonstrating compliance with Title VI are outlined in FTA Circular 4702.1B (referred to as the Title VI Circular hereafter).

The most recent triennial Title VI report was provided by the MBTA to the FTA in 2017. FTA requested revisions to the report in September 2018, and the MBTA submitted a revised report in January 2019. For years in which the MBTA does not submit a triennial report, the FTA requires the MBTA to complete annual Title VI monitoring and internal reporting to identify and address problems early and to ensure ongoing Title VI compliance. Under the MBTA's service monitoring schedule, data collection and analysis are completed annually for most service indicators and every two years for others. When possible, the results of annual monitoring are reported in subsequent triennial Title VI reports for the FTA. The most recent triennial report outlined an ongoing process of Title VI data collection and analysis, documented the results of current assessments of compliance, and indicated responsive action that would be taken with respect to Title VI concerns in the interim years (2018 and 2019) before the issuance of the 2020 report.

Central Transportation Planning Staff (CTPS) has performed data collection and analysis for MBTA Title VI reporting since the 1980s and has been responsible for producing the MBTA's 2005, 2008, 2011, 2014, and 2017 Title VI triennial reports for submittal to the FTA. CTPS has also completed annual internal reports for the MBTA since 2005 and quarterly reports for the FTA, as required. This work program represents a continuation of CTPS's involvement in the MBTA's Title VI monitoring efforts. It outlines the monitoring that will be completed for both the 2020 Triennial Title VI Report and the 2021 annual monitoring, which will provide some of the data for the analyses that will be reported in the triennial report.

Objectives

The primary objective of this work program is to produce a report that meets all of the requirements set forth in FTA Circular 4702.1B, so that the FTA can make a determination about the MBTA's compliance with Title VI regulations. To do so, CTPS will work closely with the MBTA to collect and analyze transit service data as they relate to minority populations within the MBTA's service area. CTPS will provide ongoing technical support to the MBTA's Title VI Working Group and will produce a final report for submittal to the FTA by April 30, 2020. This report will address all of the general reporting requirements as well as the required program-specific elements, which will be evaluated in the context of this work program, and will include the following:

1. Documentation of the General Requirements set forth in FTA Circular 4702.1B (most of this documentation will be provided by the MBTA)
2. Demographic analyses of the MBTA service area and production of demographic, trip generator, transit service, and transit amenity maps and overlays
3. Documentation of systemwide service standards and service policies, along with analyses of service-monitoring data, to compare the performance of services provided in minority areas with those provided in nonminority areas, and documentation of the board's consideration, awareness, and approval of the service-monitoring results
4. Documentation of completed equity analyses performed for any proposed fare changes or major service changes that have occurred since the submittal of the MBTA's last triennial Title VI report (in 2017) and a copy of board meeting minutes or a resolution demonstrating the board's consideration, awareness, and approval of the equity analyses for any service or fare changes
5. Documentation of the public engagement process for setting the major service change policy and disparate impact policy, and a copy of board meeting minutes or a resolution demonstrating the board's consideration, awareness, and approval of the major service change policy and disparate impact policy
6. Documentation of the continued outreach to MBTA departments regarding their roles in Title VI compliance

Work Description

In addition to the general reporting requirements, the Title VI Circular, dated October 1, 2012, sets forth a specific set of reporting requirements for transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an urbanized area with a population of 200,000 or more. As one of these transit providers, the MBTA is required to collect and report data through a series of demographic and service profile maps and charts, monitor and report transit service through comparative analysis based on the MBTA's systemwide service standards and service policies, and evaluate major service and fare changes with regard to equity.

The production of demographic and service profile maps and charts relies heavily on up-to-date data coverages of MBTA transit routes and amenities in the geographic information system (GIS) database maintained by CTPS. These coverages, which are based on 2010 Census data, allow CTPS to designate the transit routes that serve, and the transit amenities that are located in, predominantly minority areas.

CTPS will collect data for the comparative analysis of transit service according to the MBTA level-of-service monitoring schedule. Most indicators are monitored annually, while some are monitored every two years. The analyses conducted for the 2020 Triennial Title VI Report will utilize the most recent data available for each of the indicators.

Task 1 Produce Demographic and Service Profile Maps and Charts

CTPS will produce the following maps, overlays, and summary statistics for the MBTA service area by census tract using demographic data from the 2010 Census and 2014 American Community Survey (ACS) databases. CTPS will also provide narrative explanations of the maps. This task will consist of the following steps:

- Produce a base map of the MBTA's service area that includes each census tract, major streets and highways, the MBTA's fixed-guideway services, and MBTA stations.
- Produce demographic maps displaying all of the above, highlighting the census tracts that are defined as predominantly minority. Areas that are predominantly low-income will also be identified for the purpose of any environmental justice analyses that may be required for the analysis of the impact of major service or fare changes.
- Summarize statistics on the number and percentage of minority and low-income populations in each census tract, and indicate which census tracts are defined as predominantly minority and/or predominantly low-income.
- Produce an overlay to the base map showing population by first language spoken.

- Produce additional overlays to the demographic maps showing all of the following:
 - MBTA depots, maintenance and garage facilities, and administrative buildings (highlighting those that were recently modernized or are scheduled for modernization in the next five years)
 - Major activity centers or other transit trip generators, including the central business district, outlying high-employment areas, schools, and hospitals
 - The coverage of all transit services provided by the MBTA, highlighting areas within a reasonable walking distance of the access points
 - The locations of bus shelters
 - The locations of all CharlieCard retail sales outlets
 - Station accessibility and the distribution and operability of elevators and escalators
- Produce additional maps and summary statistics as needed to satisfy the requirements of Title VI reporting.

Products of Task 1

Base maps, demographic maps, and all required map overlays, as well as summary statistics and written descriptions and interpretations of the maps and overlays

Task 2 Monitor the Level of Service

Many of the level-of-service analyses associated with Title VI reporting rely on up-to-date data coverages of MBTA transit routes and amenities in the GIS database maintained by CTPS. These coverages allow CTPS to designate amenities as being located in, and routes as serving, predominantly minority or nonminority areas as defined by FTA Title VI guidelines. The minority and nonminority designations are used to compare service performance in minority and nonminority areas.

Subtask 2.1 Document Service Standards and Service Policies

For the level-of-service analysis, CTPS will first document the MBTA's service standards and service policies for the service indicators specified in the Title VI Circular. CTPS will use existing documentation when available and will work with the applicable MBTA departments to document additional service standards and service policies, as necessary.

Subtask 2.2 Collect Level-of-Service Data

For each of the indicators specified in the Title VI Circular, CTPS will either directly collect data to perform the required level-of-service analyses described in Subtask 2.3 below or will work with the MBTA to obtain the necessary data. Data collection activities that are not described here will be completed by the MBTA, and the results will be provided to CTPS for inclusion in the final report. The data sources are as follows:

- *Vehicle Load:* CTPS will use state fiscal year (SFY) 2019 bus and commuter rail vehicle-load data compiled by the MBTA.
- *Vehicle Headway:* CTPS will use SFY 2019 bus, rapid transit, and commuter rail vehicle-headway data compiled by the MBTA.
- *On-Time Performance:* CTPS will use SFY 2019 bus, rapid transit, and commuter rail vehicle on-time performance data compiled by the MBTA for its online performance dashboard.
- *Service Availability:* Using its GIS database, CTPS will determine the availability of transit service to all customers in the MBTA's service area.
- *Span of Service:* CTPS will use SFY 2019 span of service data compiled by the MBTA for bus, rapid transit, and commuter rail.
- *Platform Accessibility:* For gated rapid transit stations, CTPS will use SFY 2019 elevator operability data provided by the MBTA to measure the percentage of platform hours that were accessible in each station. For commuter rail stations, CTPS will use station accessibility data provided by the MBTA.
- *Vehicle Accessibility:* At this time, the MBTA lacks the data to assess full commuter rail vehicle accessibility (as measured by the percentage of stops where the accessible bathroom-equipped coaches, on trains with bathrooms, line up at an accessible boarding location at each station). Should this data become available, CTPS will use it.
- *Service Operated:* CTPS will use the MBTA's SFY 2019 data on dropped bus trips and canceled commuter rail trains, and SFY 2019 rapid transit Daily Service Reports.
- *Availability and Condition of Transit Amenities:* CTPS will monitor the following transit amenities in the context of this work program: the distribution of bus shelters and benches; condition of bus shelters, including provision of proper seating fixtures inside of bus shelters; the condition of rapid transit and commuter rail stations, including provision of

seating fixtures, timetables, trash and recycling receptacles, system and line maps, neighborhood maps, variable message signs, and Title VI notices in the stations; distribution and/or operability of automated fare collection fare gates, fare vending machines, and retail sales terminals; and distribution and operability of station escalators.

- CTPS will use data that were collected as part of the MBTA's 2018 Title VI monitoring program for the distribution of amenities at rapid transit and commuter rail stations. As part of this work program, CTPS will also conduct new field observations for the distribution of amenities at rapid transit and commuter rail stations.
- For the location and condition of bus shelters and the distribution of bus shelter amenities, CTPS will use data that were collected as part of the MBTA's 2019 Title VI monitoring program.
- The MBTA will provide data on the condition of rapid transit and commuter rail stations and the location and operability of all other amenities to CTPS.
- *Vehicle Assignment:* For bus vehicle assignment, CTPS will obtain MBTA garage pullout and maintenance records for at least one sampled hot day during summer 2019. For commuter rail vehicle assignment, CTPS will obtain commuter rail vehicle age data from the MBTA.

Subtask 2.3 Conduct Level-of-Service Analyses

For each of the indicators specified in the Title VI Circular, CTPS will use the data discussed in Subtask 2.2 to assess the performance of all services by applying the service standards and service policies documented in Subtask 2.1 and comparing the performance of the services provided to predominantly minority areas with the performance of services provided to nonminority areas. If the assessment shows a potential disparate impact on the basis of race, color, or national origin, CTPS will work with the MBTA to determine why the disparity exists and will assist in developing corrective actions to remedy the disparity to the greatest extent possible. CTPS will include in the final report a discussion of any corrective actions.

Products of Task 2

Summaries from the MBTA's service standards and service policies, tables and charts displaying collected data and results from level-of-service analyses, and written descriptions of all procedures and findings

Task 3 Document Service and Fare Equity Analyses

Since the submittal of the MBTA's 2017 Triennial Title VI Report, CTPS has conducted service and fare equity analyses for the SFY 2020 fare changes and the

2019 Better Bus Project service changes. Documentation of these completed analyses and any additional service or fare equity analyses that may be performed before completion of the work outlined in this work program will be included in the MBTA's 2020 Triennial Title VI Report.

Product of Task 3

Documentation of any service or fare equity analyses that have been completed between the submittal of the MBTA's 2017 and 2020 Triennial Title VI reports

Task 4 Document Fulfillment of General Reporting Requirements

In addition to the program-specific data collection and analysis requirements outlined above, the Title VI Circular also includes a number of general reporting requirements that are completed by departments within the MBTA. These include, for example, public notification of protection under Title VI, Title VI complaint procedures and forms, a policy for providing access for limited-English-speaking populations based on the US Department of Transportation's limited-English-proficiency (LEP) guidance on inclusive public participation processes; a breakdown of minority representation on planning and advisory bodies; and equity analyses for evaluating the siting of proposed transit facilities. The MBTA will provide CTPS with documentation related to these general reporting requirements, and CTPS will design and lay out these elements to be incorporated into documentation of the MBTA's 2020 Triennial Title VI Report.

Product of Task 4

Documentation in the 2020 Triennial Title VI Report of the fulfillment of FTA general reporting requirements

Task 5 Assemble the 2020 Triennial Title VI Report

In addition to the summary statistics, maps, and documentation produced in Tasks 1–3, CTPS will assemble and format all of the documentation provided by individual MBTA departments to produce the MBTA's Triennial Title VI Report, which is due to the FTA on April 30, 2020. CTPS will produce the final report in a format that is accessible to people with disabilities and is acceptable to the FTA. The report will have a cover with a graphical design and include graphical presentations of materials contained in the report, as appropriate. Subsequent to this submission, CTPS will provide follow-up assistance to MBTA staff to respond to issues raised by the FTA in its review of the MBTA's 2020 Title VI Program.

Product of Task 5

MBTA 2020 Triennial Title VI Report for the FTA

Task 6 Provide Ongoing Technical Support to the MBTA

CTPS staff will provide ongoing technical assistance to the MBTA to address Title VI issues, as necessary, including support to the MBTA's Title VI Working Group.

Product of Task 6

Technical support to the MBTA's Title VI Working Group and other technical support provided to the MBTA, as necessary

Exhibit 1
ESTIMATED SCHEDULE
MBTA 2020 Triennial Title VI Report

Task	Month															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
1. Produce Demographic and Service Profile Maps and Charts	█															
2. Monitor the Level of Service	█												█			
3. Document Service and Fare Equity Analyses	█															
4. Document Fulfillment of General Reporting Requirements	█															
5. Assemble the 2020 Triennial Title VI Report										█ A						
6. Provide Ongoing Technical Support to the MBTA	█															

Products/Milestones
 A: MBTA 2020 Triennial Title VI Report

Exhibit 2
ESTIMATED COST
MBTA 2020 Triennial Title VI Report

Direct Salary and Overhead	\$139,132
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Task	Person-Weeks							Direct Salary	Overhead (99.00%)	Total Cost
	M-1	P-5	P-4	P-2	P-1	Temp	Total			
1. Produce Demographic and Service Profile Maps and Charts	0.8	2.1	0.4	1.8	0.0	0.0	5.1	\$8,220	\$8,138	\$16,359
2. Monitor the Level of Service	2.0	0.0	0.0	6.8	1.8	13.0	23.6	\$19,789	\$19,591	\$39,380
3. Document Service and Fare Equity Analyses	0.2	0.0	0.0	1.5	0.0	0.0	1.7	\$2,082	\$2,061	\$4,143
4. Document Fulfillment of General Reporting Requirements	2.1	1.0	1.0	2.3	0.0	0.0	6.4	\$9,812	\$9,713	\$19,525
5. Assemble the 2020 Triennial Title VI Report	6.2	1.0	1.0	3.4	0.0	0.0	11.6	\$18,675	\$18,488	\$37,164
6. Provide Ongoing Technical Support to the MBTA	3.8	0.0	0.0	3.8	0.0	0.0	7.6	\$11,338	\$11,225	\$22,562
Total	15.1	4.1	2.4	19.6	1.8	13.0	56.0	\$69,916	\$69,216	\$139,132

Other Direct Costs	\$500
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Travel	\$500
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TOTAL COST	\$139,632
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Funding
 Future MBTA Contract