



## **BOSTON REGION METROPOLITAN PLANNING ORGANIZATION**

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Stephanie Pollack, MassDOT Secretary and CEO and MPO Chair  
Annette Demchur and Scott A. Peterson, Co-interim Executive Directors, MPO Staff

### ***WORK PLAN***

## **TRANSPORTATION EQUITY PROGRAM: FFY 2020**

OCTOBER 3, 2019

### **Proposed Action**

The Boston Region Metropolitan Planning Organization (MPO) reviews this work plan.

### **Project Identification**

Project Number 8520

Client

Boston Region MPO

Project Supervisors

*Principal:* Betsy Harvey

*Manager:* Alexandra Kleyman

Funding Source

MPO Planning and §5303 Contract #108217

### **Schedule and Budget**

**Schedule:** 12 months after work commences

**Budget:** \$171,850

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

## Background

The purpose of the MPO's Transportation Equity (TE) Program is to ensure that the MPO considers the transportation needs of populations that have been traditionally underrepresented in the transportation planning process or underserved by the transportation system (TE populations), as required by federal regulations. The program also helps the MPO meet its TE goal and related objectives. Based on federal mandates, TE populations include people who identify as minority, are low income, have limited English proficiency (LEP), are 75 years old or older or 17 years old or younger, or have a disability.<sup>1</sup> These mandates include:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166, Improving Access to Services for Persons with LEP
- Executive Order 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations
- The Americans with Disabilities Act (ADA)
- The Federal-Aid Highway Act of 1973 (provides for federal protections based on sex)
- The Age Discrimination Act of 1975

As part of this mission, the core component of the TE program is ensuring that the MPO complies with Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) Title VI, EJ, and other nondiscrimination regulations enacted through FTA Circulars 4702.1B and 4703.1, and the FHWA's EJ Reference Guide. As such, the TE Program also serves to carry out the MPO's Title VI Program.

In addition to federal compliance efforts, the MPO also pursues activities under the TE Program that exceeds federal requirements to better address the transportation needs of TE populations in the Boston region. The MPO's TE goal and accompanying objectives, as laid out in the most recent Long-Range Transportation Plan (LRTP), *Destination 2040*, provides the framework for carrying out these efforts. The current goal states that the MPO will

*Ensure that all people receive comparable benefits from, and are not disproportionately burdened by, MPO investments, regardless of race, color, national origin, age, income, ability, or sex.*

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<sup>1</sup> The MPO considers anyone whose family income is less than or equal to 200 percent of federal poverty thresholds for their family size (and householder age, as appropriate) to be a low-income person.

The TE Program ensures that this goal is reflected in all MPO activities, including certification documents and public engagement efforts. This is done through the development and implementation of various equity analyses that the MPO considers critical for achieving its TE goal and public engagement with TE populations in the Boston region.

## Objective(s)

The TE Program has three main objectives, as follows:

1. Implement the MPO's Title VI Program to ensure that the MPO complies with all federal and state Title VI, EJ, and other nondiscrimination regulations
2. Coordinate the development and implementation of TE analyses to evaluate MPO investments
3. Provide TE populations meaningful opportunities to participate in the MPO's planning and decision-making processes

## Work Description

The TE Program for federal fiscal year (FFY) 2020 is structured to reflect these three objectives, which generally remain the same from year to year. The subtasks and work products listed below can vary for each FFY, based on the specific needs of the MPO in a given year or based on specific research, analysis, and outreach work recommended by MPO staff to carry out or enhance the TE Program. The TE Program also supports other MPO programs, including the LRTP, Transportation Improvement Program (TIP), Unified Planning Work Program, public participation, and other specific studies undertaken by MPO staff. Some of the MPO's Title VI activities are undertaken under other MPO work plans; for instance, translating vital documents, as identified in the MPO's Language Assistance Plan (LAP) (completed under the MPO's Direct Support budget), and providing MPO documents in accessible formats (completed under 3C Planning and MPO Support).

### **Task 1 Title VI Triennial Reporting and Compliance with Title VI, EJ, and Nondiscrimination Requirements**

The MPO complies with and documents its compliance with the FTA's and FHWA's Title VI, EJ, and nondiscrimination requirements each year. The MPO also makes notices and documents available to the public each year regarding civil rights, as needed; trains staff, as necessary, in Title VI, ADA, and other nondiscrimination policies; and monitors civil rights and EJ developments at the FTA and FHWA.

Every three years, the MPO must complete a triennial Title VI report that documents the MPO's compliance with FTA and FHWA regulations over the preceding three years. As FFY 2020 is a triennial year, the MPO will complete this report, which will

include addressing the Massachusetts Department of Transportation's (MassDOT) Office of Diversity and Civil Rights (ODCR) work plan for the MPO. ODCR develops work plans for all of Massachusetts' MPOs to ensure consistency across Title VI activities statewide. This task will consist of preparing and submitting the MPO's triennial Title VI report, including an updated LAP, which documents the MPO's compliance with federal Title VI, EJ, and nondiscrimination mandates and addresses ODCR's work plan for the MPO.

*Product of Task 1*

- Triennial Title VI report documenting the MPO's compliance with federal Title VI, EJ, and nondiscrimination mandates

**Task 2 Develop TE Analyses**

The activities in this task develop and implement the analytical components of the TE Program, both those conducted to ensure compliance with federal and state regulations and those that are not required but help the MPO to meet its TE goal and objectives. The latter analyses are typically done to support other MPO programs to ensure that the transportation needs of TE populations are reflected across the MPO's activities. Specific work to be completed in FFY 2020 includes:

*Subtask 2.1 Develop Federally Required Title VI, EJ, and Nondiscrimination Analyses*

Under this subtask, staff will develop new methods for and refine existing analytical approaches to federally required Title VI, EJ, and nondiscrimination analyses. In FFY 2020, work completed under subtask 2.1 will include:

- Developing metrics and analytical approaches with which to assess the benefits and burdens of the collection of projects programmed in the TIP
- Supporting phase two of the development of the MPO's LRTP Disparate Impact and Disproportionate Burden Policy. Phase two will be undertaken through the FFY 2020 Disparate Impact Metrics Analysis study (described in a separate work scope)

*Subtask 2.2 Develop Equity Analyses to Support MPO Programs*

The goal of this subtask will be to coordinate with other MPO programs to develop analyses that help the MPO identify and address the transportation needs of populations protected by federal mandates, as well as the potential effect of MPO investments on these populations. Activities may include, but are not limited to

- Developing TIP project selection criteria related to TE;
- Exploring transportation data related to TE populations to identify current transportation needs of TE populations and barriers to transportation as

identified in the *Destination 2040* Needs Assessment. These barriers could include risk of exposure to extreme weather conditions, exposure to transportation emissions, and congestion, among other metrics. This work will also include exploring ways to report these data, for instance, with current MPO web applications; and

- Exploring the development of MPO targets for a TE performance measure. This will be done in collaboration with the Performance-Based Planning and Programming Program.

#### *Subtask 2.3 Manage the MPO Staff's TE Analysis Committee*

Periodically, the MPO staff has convened an internal technical committee to help ensure that equity-related analyses are consistently implemented agency-wide, and to promote the integration of EJ and Title VI principles throughout all MPO activities. As the need arises, this committee will be convened to develop strategies for updating the various components of these analyses, involving staff from across the agency with relevant expertise. Decisions made by this committee will be implemented in the appropriate equity analyses described in subtasks 2.1 and 2.2.

#### *Products of Task 2*

- Memorandum describing staff's efforts to develop analyses of the benefits and burdens of the collection of projects programmed in the TIP, including those recommended for application to the TIP
- TE project selection criteria for projects proposed for funding in the TIP, and supporting documentation

### **Task 3 Conduct Public Engagement with Traditionally Underserved Populations**

Under this task, staff will continue to conduct public outreach targeted specifically to TE populations to ensure that they have meaningful opportunities to engage with the MPO's planning and decision-making processes.

#### *Subtask 3.1 Relationship-building with TE Populations*

This subtask will be undertaken in collaboration with the Public Participation Program. The goals of this subtask will be to build new and strengthen existing relationships with organizations that serve TE populations to improve their awareness of the MPO and provide meaningful opportunities for participation. Staff will also experiment with novel methods of engaging TE populations, such as pop-up events to better reach TE populations (these are documented further in the 3C Planning and MPO Support work plan). Through these efforts, staff will gather information about the transportation needs of these populations and incorporate it into the MPO's planning documents, as appropriate.

*Subtask 3.2 Produce and Maintain Online Communications*

Under this subtask, staff will produce and maintain existing online communications. These efforts will include the quarterly TE newsletter, equity-related webpages, and the TE email list.

*Products of Task 3*

- Four (quarterly) TE newsletters that highlight MPO equity-related activities and communicate opportunities for involvement with MPO activities

**Task 4 Provide Ongoing Support to MassDOT**

Periodically, MassDOT, via ODCR, requests that the MPO provide information in various formats so that MassDOT and the MPO remain compliant with federal regulations. Staff will respond to these requests as they arise. These activities will include assisting MassDOT's Rail and Transit Division's solicitation for projects, and project scoring for several state and federal programs, as requested. As in the previous FFY, it is anticipated that MassDOT will ask the MPO to participate in scoring project proposals seeking funding through the FTA Section 5310 program grants, which provide capital and operating assistance for addressing the mobility needs of the elderly and people with disabilities.

**Exhibit 1**  
**ESTIMATED SCHEDULE**  
**Transportation Equity Program**

Task	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
1. Title VI Triennial Reporting and Compliance with Title VI, EJ, and Nondiscrimination Requirements	A											
2. Develop TE Analyses	B											C
3. Conduct Public Engagement with Traditionally Underserved Populations	D	D	D	D								
4. Provide Ongoing Support to MassDOT												

Products/Milestones

- A: Triennial Title VI Report
- B: TE TIP project selection criteria
- C: Memo documenting progress of developing TIP benefits and burdens analysis
- D: TE Newsletter

**Exhibit 2**  
**ESTIMATED COST**  
**Transportation Equity Program**

<b>Direct Salary and Overhead</b>	<b>\$171,850</b>
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Task	Person-Weeks							Direct Salary	Overhead (102.11%)	Total Cost
	M-1	P-5	P-4	P-3	P-2	SP-1	Total			
1. Title VI Triennial Reporting and Compliance with Title VI, EJ, and Nondiscrimination Requirements	7.2	0.2	0.0	10.8	4.0	0.0	22.2	\$31,863	\$32,535	\$64,398
2. Develop TE Analyses	2.7	2.3	2.6	20.3	0.0	2.2	30.1	\$40,581	\$41,437	\$82,018
3. Conduct Public Engagement with Traditionally Underserved Populations	0.4	0.0	0.0	8.4	0.0	0.0	8.8	\$11,325	\$11,564	\$22,888
4. Provide Ongoing Support to MassDOT	0.0	0.0	0.0	1.0	0.0	0.0	1.0	\$1,260	\$1,286	\$2,546
Total	10.3	2.5	2.6	40.5	4.0	2.2	62.1	\$85,028	\$86,822	\$171,850

<b>Other Direct Costs</b>	<b>\$0</b>
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<b>TOTAL COST</b>	<b>\$171,850</b>
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**Funding**

Project Number: 8520  
MPO Planning and §5303 Contract #108217