



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



Kimberly Robinson
60 Congress Street Springfield, MA 01104

8/2/2022

Re: Annual Title VI Reporting Requirements

The Massachusetts Department of Transportation (MassDOT), as a direct recipient of federal financial assistance through the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), is required to demonstrate compliance with Title VI of the Civil Rights Act of 1964 (Title VI). This includes monitoring subrecipients of federal financial assistance – or those organizations to which MassDOT passes through FHWA and FTA dollars. Among MassDOT’s subrecipients are the Metropolitan Planning Organizations (MPOs) and Regional Planning Agencies (RPAs) that perform regional transportation planning activities across the Commonwealth.

One primary mechanism for monitoring MPO/RPA compliance with Title VI obligations is through recurring reporting provided by each region to MassDOT. This correspondence is intended to detail this year’s Title VI reporting requirements. In general, these annual reporting requirements can be characterized in one of two ways – targeted reporting requirements or the submission of a comprehensive Title VI plan. For several of the most recent annual reporting cycles, MassDOT has requested the MPOs/RPAs to provide targeted reports, where each region was instructed to focus on particular compliance improvements. For this reporting cycle, MassDOT is requesting a comprehensive Title VI plan submission from each region.

By ensuring that each planning region has an up-to-date Title VI plan, MassDOT has the opportunity to confirm that all Title VI compliance requirements are being met. In addition, this allows each planning region the opportunity to consider and implement process improvements and other enhancements to their Title VI activities and helps facilitate federal certification reviews by ensuring these activities are properly documented and ready to share with federal partners when needed.

The following table identifies all of the required components for this year’s annual Title VI reporting. Please be prepared to submit a responsive Title VI plan by December 31, 2022. Note that the table indicates whether individual Title VI plan components satisfy an FHWA compliance requirement, and FTA compliance requirement, or both. There are also important notes regarding certain reporting elements, to help facilitate preparing the requested submission. If there are concerns about the timing of the due date, please contact MassDOT’s Office of Transportation Planning at the contact info provided below.

Lastly, it is important to emphasize that meeting these reporting requirements does not necessitate developing all new content. If an MPO/RPA believes that their existing Title VI plan components are up to date, please feel free to submit them as they are.

For questions or technical assistance, please contact: Raissah Kouame, Regional Planning Coordinator, MassDOT Office of Transportation Planning, raissah.a.kouame@dot.state.ma.us.

Title VI Plan Components and Annual Report Content	FHWA Requirement	FTA Requirement
Title VI Assurances <i>Note: Attached is a copy of MassDOT's Title VI Assurances document. Please sign on the subrecipient signature page and submit to MassDOT.</i>	X	
Certifications and Assurances <i>Note: The latest version can be downloaded here. Please sign and submit to MassDOT.</i>		X
Title VI Notice <i>Note: MassDOT has developed an updated Title VI Notice, which is attached. This can be used as a template for the MPO/RPA Notice. Please make sure that the Notice you submit lists the MPO/RPA as a point of contact for receiving Title VI related inquiries and complaints. MassDOT is also providing translated versions of this document to facilitate language access requirements. Translated versions will be provided when they are available from the translation vendor. Please indicate how you plan on disseminating this document.</i>	X	X
Complaint Procedures <i>Note: MassDOT has developed updated Title VI Complaint Procedures, which are attached. This can be used as a template for the MPO/RPA procedures. MassDOT is also providing translated versions of this document to facilitate language access requirements. Translated versions will be provided when they are available from the translation vendor. Please indicate how you plan on disseminating the document.</i>	X	X
Complaint Form <i>Note: MassDOT has developed an updated Title VI Complaint Form, which is attached. This can be used as a template for the MPO/RPA form. MassDOT is also providing translated versions of this document to facilitate language access requirements. Please indicate how you plan on disseminating the document.</i>	X	X
Complaint Log <i>Note: Please provide a log of Title VI related complaints over a one-year lookback period (since July 2021).</i>	X	X
Public Participation Plan <i>Note: MassDOT is working on developing a new Public Participation Plan that will be made available, when complete, to all MPOs/RPAs. This new Plan will capture details regarding MassDOT's approach to virtual, hybrid, and in-person public engagement. For this reporting cycle, please provide a copy of your current Public Participation Plan and an indication of the anticipated schedule and strategy for any upcoming updates to the existing plan.</i>	X	X
Language Assistance Plan <i>Note: Please make sure that the Four-Factor Analysis in your current Language Assistance Plan is up to date.</i>	X	X

<p>Subrecipient Monitoring Process <i>Note: For those MPOs/RPAs that pass through federal financial assistance to additional subrecipients, please specify how those subrecipients are monitored for Title VI compliance.</i></p>	X	X
<p>Title VI Program Approval <i>Note: Please provide documentation showing the appropriate MPO/RPA official responsible for policy decisions reviewed and approved the Title VI Plan submission. According to each region's bylaws, the appropriate entity could be the Executive Director, the Chair of the Board, or the Board itself.</i></p>		X
<p>Organization and Staffing <i>Note: Please identify the MPOs/RPAs Title VI Coordinator and an organizational chart that should demonstrate their ready access to the head of the agency.</i></p>	X	
<p>Program Review Procedures <i>Note: Please describe how the Title VI Coordinator confirms that Title VI compliance requirements are being met by the MPO/RPA.</i></p>	X	
<p>Data Collection/Reporting/Analysis <i>Note: Please briefly describe how the MPO/RPA collects, utilizes, and analyzes Title VI related data, such as population demographics.</i></p>	X	X
<p>Title VI Training <i>Note: Please identify and describe any Title VI related trainings that MPO/RPA staff have participated in during the last year (since July 2021).</i></p>	X	X
<p>Dissemination of Title VI Information <i>Note: Please describe, and provide some examples, of how Title VI related documentation and information is shared with the public.</i></p>	X	X
<p>Demographic Profile of Metropolitan Area <i>Note: This should include identification of the locations of minority populations in the aggregate. In addition to minority populations, the MPO/RPA can also identify low-income and limited English proficient populations as well as the concentration of individuals with disabilities.</i></p>		X
<p>Mobility Needs of Minority Populations <i>Note: Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.</i></p>		X
<p>Demographic Maps and Charts of Funding Distribution <i>Note: Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient. Please analyze the investments from the current TIP and current UPWP.</i></p>		X

<p>Analysis of MPO Transportation System Investments, Identifying and Addressing any Disparate Impacts</p> <p><i>Note: An analysis the funding distribution provided above that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.</i></p>		X
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