



Maura Healey, Governor  
Kimberley Driscoll, Lieutenant Governor  
Monica Tibbitts-Nutt, Secretary & CEO  
Phillip Eng, General Manager & CEO



August 1, 2024

Pioneer Valley Planning Commission  
Attn: Dana Roscoe and Gary Roux  
60 Congress Street, First Floor  
Springfield, MA 01104

Dear Ms. Roscoe and Mr. Roux,

The MassDOT Office of Diversity and Civil Rights (ODCR) has concluded its 2023-2024 MPO Title VI Program review. Pioneer Valley Planning Commission (PVPC) submitted a revised Title VI submission on January 10, 2024, which included updates that addressed recommendations from ODCR's review of the program submitted in early 2023.

We appreciate PVPC's responsiveness and careful consideration of ODCR's comments. We would also like to highlight PVPC's new [Title VI webpage](#). This newly designed website provides the public with all Title VI related content in a central location that is easy to navigate.

Below you will find a final set of comments to be addressed with the next update of your Title VI Program. Additionally, long-term recommendations issued on August 29, 2023, should also be considered and addressed within future updates.

**Title VI Complaint Procedures:** Similar to the Title VI Notice to the Public and Title VI Complaint Form, the Title VI Complaint Procedures should also be available in languages other than English on PVPC's website. As an example, please refer to [MassDOT's Discrimination Complaint](#) webpage, where forms and procedures are provided in multiple languages.

**LEP Four-Factor Analysis and Language Access Plan (LAP):** With future updates, CMRPC should address the following comments in its four-factor analysis and LAP.

- Factor 2: PVPC should collect and report data to show the current frequency of contact with LEP populations. Methods for collecting this data may include surveying front line staff, tracking requests for language assistance, reviewing website analytics, etc.
- Factor 4: PVPC should perform an analysis of the current cost for providing language assistance services and determine whether funding has been sufficient for addressing the needs of LEP populations.
- Language Access Plan:
  - o PVPC should include a training program that details the frequency of staff training on working with LEP populations, and tools available to staff for providing language services.

**Subrecipient Monitoring Procedures:** It is MassDOT's understanding that PVPC does not currently have active subrecipients. However, it is still recommended that the MPO have subrecipient monitoring procedures in place, in the event that this changes. Having these monitoring procedures is a

requirement under Title VI and is something that MassDOT and our federal partners may confirm during compliance monitoring activities. Future updates of the program should include these procedures, and ODCR is happy to provide examples upon request.

**Board/Organization Head Approval:** PVPC has not submitted Title VI Plan approval documentation. To meet this requirement, PVPC should submit a letter signed by the Executive Director, demonstrating awareness and approval of the program.

**Title VI Coordinator Confirmation of Compliance with Title VI:** Future updates of the program should include further details on how the Title VI Coordinator confirms compliance with Title VI throughout PVPC's transportation planning activities. This may include conducting/reviewing equity analyses, meeting with staff to discuss project impacts to underserved communities, sharing strategies for inclusive outreach, etc.

With the goal of streamlining how Title VI information is shared and received, ODCR has recently developed SHARE (Subrecipient Hub and Resource Exchange), a SharePoint page designed to provide MPOs with the most up to date Title VI information, templates, data tools, etc. Additionally, the page has a built-in discussion board that allows MPOs to pose and answer questions, providing an avenue for the sharing of best practices and problem solving. Access to the site can be requested by completing the [SHARE Access Request Form](#).

Again, thank you for your continued cooperation and demonstrated commitment to Title VI compliance. Please do not hesitate to contact ODCR with any questions or concerns.

Sincerely,  
*Tiffany Garcia*

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