



# **Massachusetts Bay Transportation Authority**

## **Triennial Title VI Program *and* Public Engagement Plan**

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Fiscal and Management Control Board

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# Background and Purpose

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- The objective of Title VI of the Civil Rights Act of 1964 (Title VI) is to provide federally funded public services in a nondiscriminatory manner.
- Every three years, public transit providers are required to submit a Title VI Program to the Federal Transit Administration (FTA)
- The Title VI Program addresses two objectives –
  1. Scrutinize the prior three years of programs, services, and activities to identify and better understand possible disparities
  2. Detail the compliance and implementation strategies that will shape programs, services, and activities going forward



# The Many Touch Points of Title VI

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- The triennial Title VI program is a fundamental reporting requirement and the content is intended to provide a comprehensive status of efforts to achieve objectives under the law. However, it is only one of many Title VI initiatives this Board regularly considers.
- Between triennial Title VI reports, the MBTA considers:
  - Equity analyses of service and fare changes,
  - Capital investment plans reflective of social and geographic equity,
  - Project development, including benefits, burdens, and environmental justice,
  - Public engagement plans designed to reach diverse populations,
  - Service planning projects striving to minimize disparities.



# Title VI Program Content

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- As detailed in FTA Circular 4702.1B (October 2012), triennial Title VI reports must include:

## Universal Reporting Requirements

- Notice to the Public
- Complaint Form
- Complaint Procedures
- Complaint Log
- Public Participation Plan
- Language Assistance Plan
- Demographics of Advisory Boards
- Subrecipient Monitoring Protocols
- Construction Site Location Analyses

## Public Transit Provider Reporting Requirements

- Set and Monitor Service Standards
  - Vehicle Load
  - Vehicle Headway
  - On-time performance
  - Service availability
- Set and Monitor Service Policies
  - Distribution of Amenities
  - Vehicle Assignment
- Service Area Demographics
- Customer Demographics and Travel Patterns (Survey)
- Disparate Impact/Disproportionate Burden Policy
- Service and Fare Equity Analyses



# Content Highlights – Developed and Implemented

- Several components of the Title VI Program reflect existing federally approved content that is integrated into agency operations, such as:
  - Notice to the Public
  - Complaint Form
  - Complaint Procedures
  - Disparate Impact/Disproportionate Burden Policy
  - Subrecipient Technical Assistance



# Content Highlights – Service Monitoring Results

## Service Standards

- Service Standards focus on the time, place, crowding, and accessibility of service, such as:
  - Vehicle load,
  - Vehicle headway,
  - On-time performance,
  - Service availability,
  - Span of service,
  - Platform accessibility,
  - Vehicle accessibility, and
  - Service operated.
- Of 44 indicators:
  - 38 showed NO disparate impact
  - 6 showed a potential disparate impact

## Service Policies

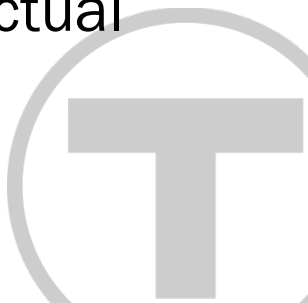
- Service Policies focus on cleanliness, amenities, and communications of service, such as:
  - Stop shelters,
  - Station seating,
  - Map and schedule postings,
  - Trash receptacles,
  - Message signs,
  - Escalator operability,
  - Vehicle assignment,
- Of 46 indicators:
  - 43 showed NO disparate impact
  - 3 showed a potential disparate impact



# Responding to Potential Disparities

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- The indication of a potential disparity in service monitoring is regarded as an opportunity for a closer look to better understand the outcome.
- Some disparities, once identified, may call for proactive steps to avoid, minimize, or mitigate.
- Other disparities may need to be considered in the context of:
  - Legitimate nondiscriminatory justifications
  - Analysis methodologies that are required but may not accurately reflect actual rider experience



# Potential Service Standard Disparities

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## Vehicle Headway

1. Bus - Weekday
2. Heavy and Light Rail - Saturday

## Platform Accessibility

3. Gated rapid transit stations with elevators

## Commuter Rail Service Operated

4. Weekday
5. Saturday
6. Sunday





# Potential Service Standard Disparities – A Closer Look (1/2)

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## Vehicle Headway

### Bus – Weekday

- What better captures rider experience? Analyzing by route, or analyzing by riders?
- The percentage of passengers on minority routes that pass the standard is 79.8% while the percentage of passengers on nonminority routes that pass the standard is 88.2%.
- Note: Better Bus Project has reduced the potential disparity.

### Heavy and Light Rail – Saturday

- There is only one frequency threshold for Saturdays and the Mattapan line doesn't meet it early morning and late night
- Demand is not uniform across the day on Saturday
- Note: Service Planning is analyzing to determine if additional frequency is needed.



# Potential Service Standard Disparities – A Closer Look (2/2)

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## Platform Accessibility

### Gated Rapid Transit Stations with Elevators

- The average percentage of station platform hours that are accessible by elevator is 99.2%, which includes planned elevator replacement projects
- The elevator replacement program modernizes elevators based on age, ridership, and coordination with other station projects. Temporary disruptions are mitigated by the overall benefit of new, more reliable infrastructure.
- Note: shuttle bus service is provided where elevators are being replaced.

## Commuter Rail Service Operated

Of all the commuter rail lines, 1 is classified as “minority.” Average weekday service operated is 99.9% for non-minority lines and 99.7% for the minority line. This means no minority line is performing above the average – but is this an indication of a disparity?



# Potential Service Policy Disparities

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## Rapid Transit Station Amenities and Conditions

1. Gated rapid transit station conditions
2. Surface rapid transit conditions

## Vehicle Assignment

3. Commuter rail vehicle age



# Potential Service Policy Disparities – A Closer Look

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## Rapid Transit Station Amenities and Conditions

### Gated rapid transit station conditions

- What better captures rider experience? Analyzing by station or analyzing by riders?
- Analyzing by riders results in an average cleanliness score of 90.0% for minority customers and 93.6% for nonminority customers.

### Surface rapid transit conditions

- Analyzing by riders results in an average cleanliness score of 96.4% for minority customers and 98.4% for nonminority customers.

## Vehicle Assignment

### Commuter rail vehicle age

- Vehicle assignments are based on capacity, but single-level cars are older than bi-level cars, so older vehicles are in use on lower ridership routes, such as the one minority line.
- 80 new bi-level cars are on order to replace the oldest single-level cars.



# Content Highlights – Innovations and New Approaches

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- Language Assistance Plan –
  - Collaboration with local LEP serving organizations to disseminate information for accessing MBTA services in all “safe-harbor” languages (5% of the service area population, or 1000 people, whichever is less).
  - Study of machine translation capabilities for website content and service alerts.
- Public Engagement Plan –
  - Establishing a baseline of public engagement techniques, goals, and opportunities that can be integrated into MBTA’s departments, services, and initiatives to empower the public to be part of the decision-making process and to allow staff to achieve public engagement objectives.



# What is Public Engagement?

- Public engagement is the opportunity for riders to influence what happens at the MBTA, from service and projects, to fares.
- Understanding the diverse wants and needs of MBTA riders will allow the MBTA to better serve its customers and deliver on critical projects.
- By soliciting and incorporating customer input early, projects are strengthened.
- Further, as part of our Title VI Program the MBTA is required to have a Public Engagement Plan that details outreach strategies designed to achieve diverse and inclusive public engagement.



Public Meeting at MIT AgeLab



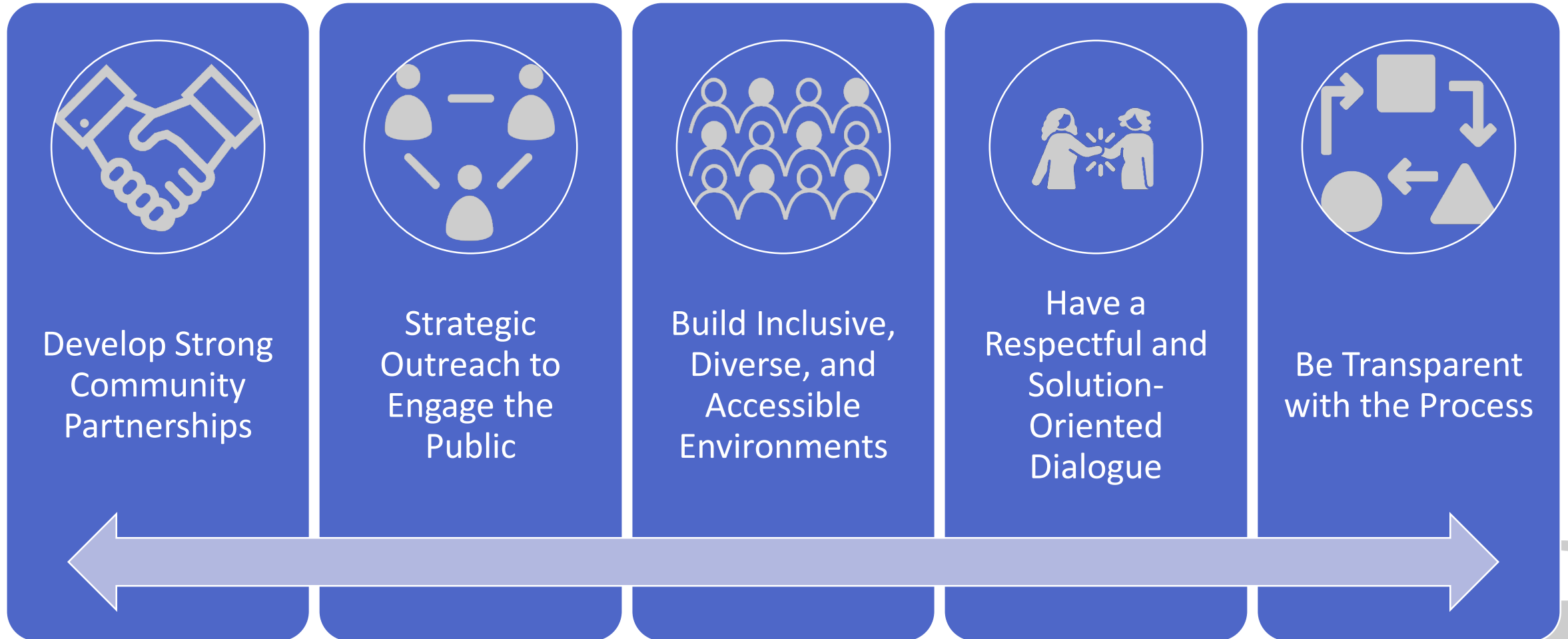
# The MBTA Public Engagement Plan

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- The MBTA developed a Public Engagement Plan (PEP), with input from the public, to guide authority-wide public engagement
- The Plan provides guidance for how to conduct outreach, notification, and engagement with external stakeholders.
- The Plan sets forth the baseline requirements for public engagement at the MBTA. Projects can go above and beyond this baseline, but these standards set the requirements for all MBTA engagement.



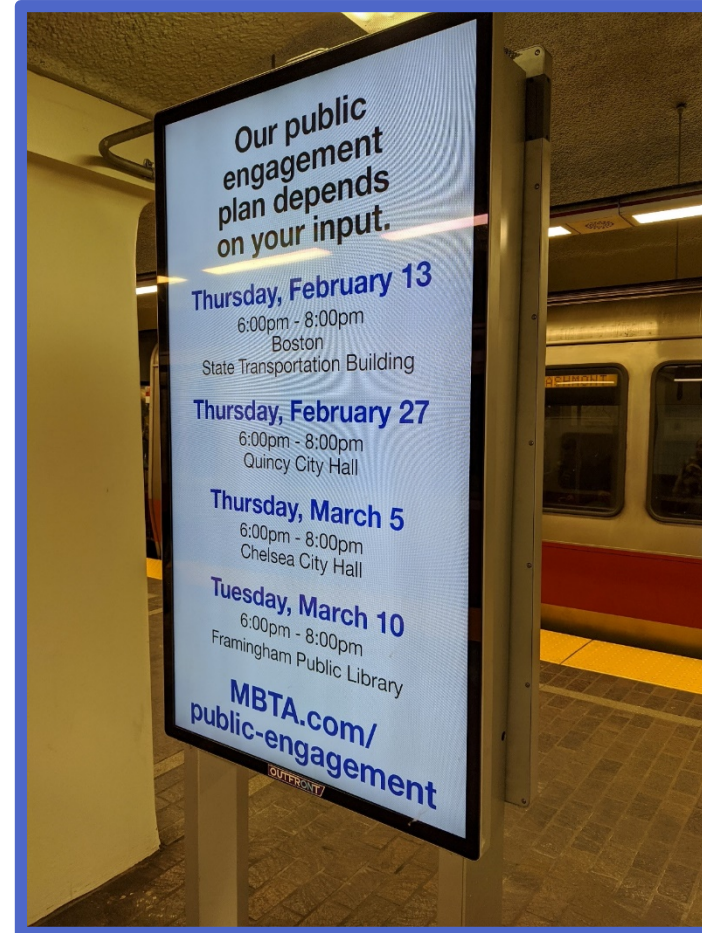
# Guiding Principles for Public Engagement at the MBTA





# PEP Outreach By the Numbers

- **60** day public comment period (January 21 - March 20)
- **3** public meetings (*4<sup>th</sup> cancelled due to coronavirus*)
- **1** meeting livestreamed and recorded
- **6** additional languages of the draft Plan posted online
- **228** comments received



Public Engagement Plan Meeting Dates & Locations in Park Street Station



# Feedback Received on the Plan

1. Service needs to be improved
2. The MBTA needs to listen to riders regarding fare increases
3. Transparency is critical to improving trust in the MBTA
4. Priority should be given to frequent, on-system, low-impact engagement tactics
5. New governance structure should maintain access for the public



Downtown Boston PEP Meeting

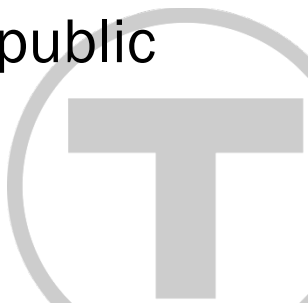


## Feedback Received on the Plan (cont.)



**Chelsea PEP Public Meeting**

6. The MBTA should explore new models of engagement, while maintaining accessibility
7. The MBTA should leverage its existing resources to share information with riders
8. The MBTA should clarify how public input is managed and information is shared with leadership
9. Opportunities need to be given for different types of riders to influence the MBTA
10. Budget line items should exist for public engagement across the MBTA



# Public Engagement – Next Steps

- Share comments received related to service and other items with relevant departments;
- Conduct a review of public engagement processes at the MBTA to determine where improvements need to be made to meet Public Engagement Plan principles;
- Develop guidance for Authority staff and contractors on how to implement the Public Engagement Plan; and,
- Implement “quick-wins” identified through the public input process on the draft Public Engagement Plan, to make early, near-term improvements to public engagement.



Downtown Boston PEP Meeting



# Thank you!



For more information on MBTA Public Engagement, visit us online at [www.mbta.com/public-engagement](http://www.mbta.com/public-engagement).



# Request for Vote to Approve

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- This presentation concludes with a request for FMCB vote to approve the 2020-2023 Title VI Program.
- With approval, the Title VI team can –
  - Incorporate the Public Engagement Plan into the Title VI Program.
  - Disseminate the document to the public and among our stakeholders.
  - Submit the report to our partners at the Federal Transit Administration.
  - Shift to implementation of key initiatives, such as language access and public engagement.

