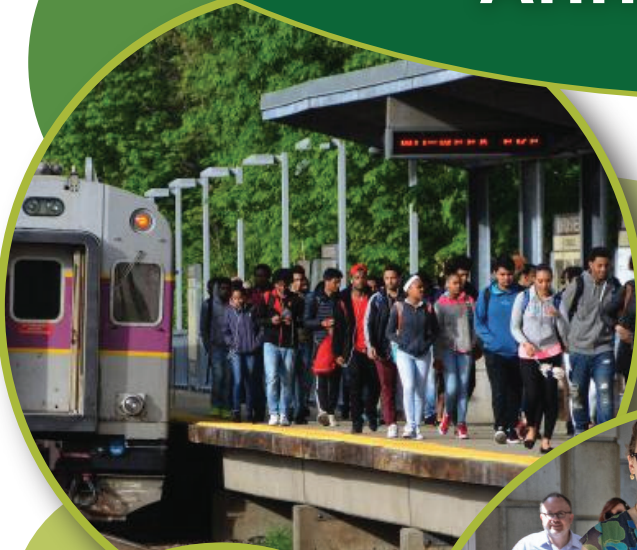




Title VI

Prepared by the
Boston Region
Metropolitan Planning
Organization Staff

2020 Annual Update



The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center containing the text. The colors range from light, pale greens to more saturated, olive greens and yellows. The circles are semi-transparent, creating a layered effect.

Title VI

BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

FEDERAL FISCAL YEAR 2020 TITLE VI ANNUAL UPDATE

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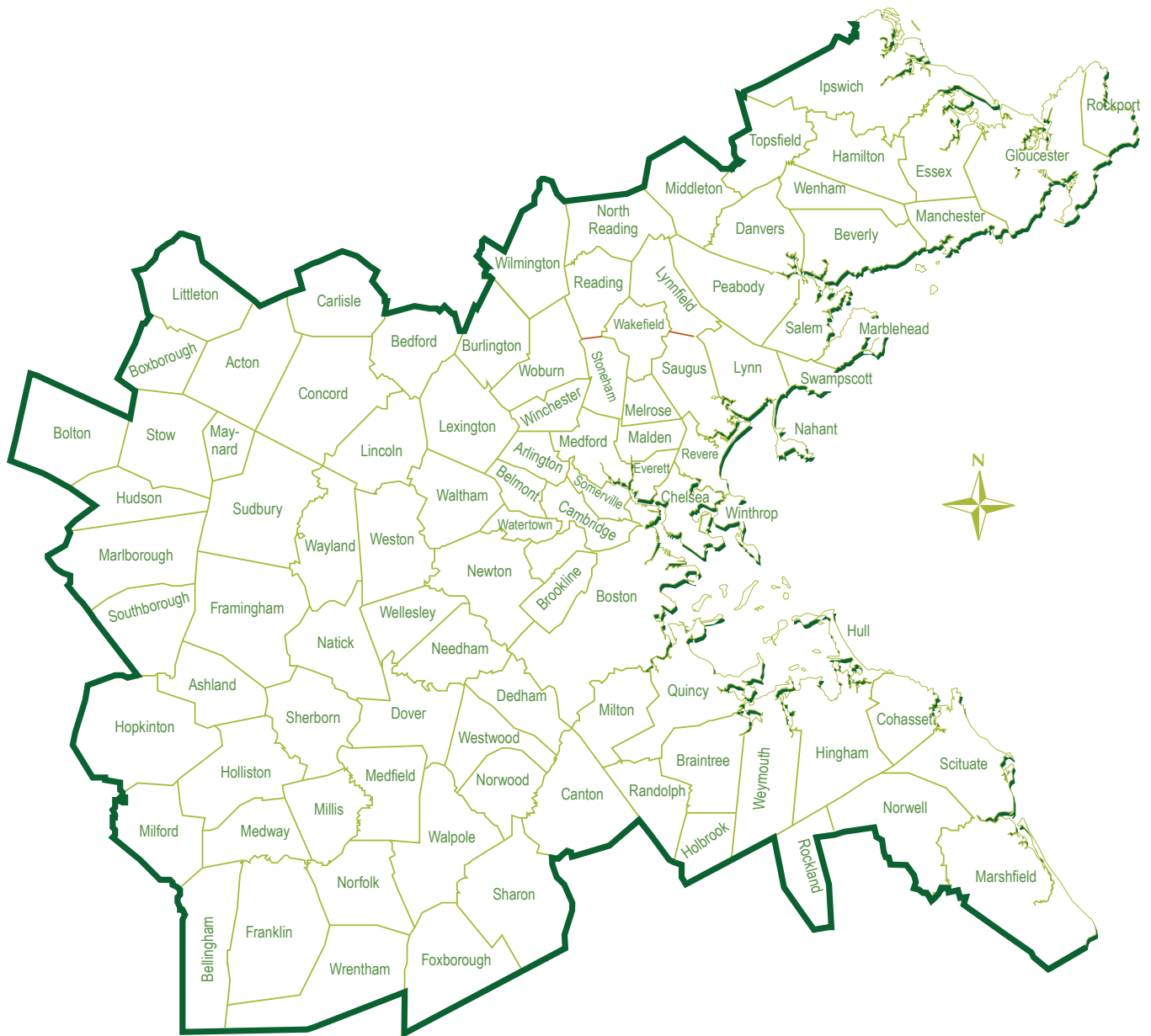
Design

Kate Parker-O'Toole

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Central Transportation Planning Staff is directed by the Boston Region Metropolitan Planning Organization (MPO). The MPO is composed of state and regional agencies and authorities, and local governments.

February 2020



BOSTON REGION METROPOLITAN PLANNING ORGANIZATION MUNICIPALITIES

For general inquiries, contact

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The Boston Region Metropolitan Planning Organization (MPO) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, Federal Transit Administration, or both, prohibit discrimination on the basis of age, sex, and disability. The Boston Region MPO considers these protected populations in its Title VI Programs, consistent with federal interpretation and administration. In addition, the Boston Region MPO provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with U.S. Department of Transportation policy and guidance on federal Executive Order 13166.

The Boston Region MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 sections 92a, 98, 98a, which prohibits making any distinction, discrimination, or restriction in admission to, or treatment in a place of public accommodation based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry. Likewise, the Boston Region MPO complies with the Governor's Executive Order 526, section 4, which requires that all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status (including Vietnam-era veterans), or background.

A complaint form and additional information can be obtained by contacting the MPO or at http://www.bostonmpo.org/mpo_non_discrimination.

To request this information in a different language or in an accessible format, please contact
Title VI Specialist
Boston Region MPO
10 Park Plaza, Suite 2150
Boston, MA 02116
857.702.3700 (voice)
617.570.9193 (TTY)
civilrights@ctps.org

ABSTRACT

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” To fulfill this mandate, each federal agency that provides financial assistance is authorized and directed by the United States Department of Justice to apply Title VI to each recipient of federal funds by issuing applicable requirements.

As a subrecipient of funding from Federal Highway Administration and Federal Transit Administration distributed through the Massachusetts Department of Transportation (MassDOT), the Boston Region Metropolitan Planning Organization (MPO) has prepared this annual report for submission to MassDOT demonstrating the MPO’s Title VI compliance. The report responds to MassDOT’s comments and recommendations for the MPO’s Title VI Program in the federal fiscal year 2020.

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The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center containing the text. The colors range from light, pale greens to more saturated, olive greens and yellows. The circles are semi-transparent, creating a layered effect.

Title VI

Executive Summary

BACKGROUND AND PURPOSE

The Boston Region Metropolitan Planning Organization (MPO) is responsible for conducting the federally required metropolitan transportation planning process (often called the 3C—continuing, cooperative, and comprehensive—process) for the Boston metropolitan area. The MPO uses this process to develop a vision for the transportation system in the region and then decides how to allocate federal and state transportation funds to programs and projects—for roadway, transit, bicycle, and pedestrian infrastructure improvements—that support this vision. To perform the 3C planning process, the MPO receives funding from both the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA).

As a recipient of this federal funding, the MPO is required to comply with various civil rights statutes, executive orders, and regulations that are intended to ensure that populations that have traditionally been underserved by the transportation system are included in the planning process and have meaningful opportunities to participate in the MPO's planning activities. The primary civil rights authorizations with which the MPO complies include the following:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166—Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 12898—Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

- The Americans with Disabilities Act
- Title 23 (Section 324) of the US Code—Prohibition of discrimination on the basis of sex
- The Age Discrimination Act of 1975

The MPO is a subrecipient of federal financial assistance through the Massachusetts Department of Transportation (MassDOT). As such, MassDOT oversees the MPO's compliance with FHWA and FTA Title VI requirements through the MPO's annual and triennial Title VI reports. For federal fiscal year 2020, MassDOT developed a customized work plan for the MPO to maintain compliance with Title VI requirements. This annual report addresses those recommendations and demonstrates the MPO's compliance with MassDOT's work plan.

MASSDOT 2020 TITLE VI WORK PLAN

MassDOT's work plan for the MPO includes specific comments and recommendations structured around the MPO's compliance efforts articulated in previous Title VI reporting requirements. This annual report summarizes MassDOT's recommendations and related comments, and the MPO's responses. The topics that this report addresses include the following:

- Notice of Nondiscrimination
 - ◉ Review and update contact details on Notice of Nondiscrimination Rights, and ensure it is available at all points of contact with the public.
- Language access
 - ◉ Consider the use of non-English materials on the MPO's website, and identify whether materials are needed in other languages based on the needs of people with limited English proficiency in the region.
 - ◉ Discuss the use of languages other than English during the outreach process for the MPO's most recent Regional Transportation Plan (RTP).
- Equity analyses
 - ◉ Discuss changes made to the most recent equity analyses conducted for the RTP since the previous RTP cycle.
 - ◉ Discuss how the MPO distinguishes between Title VI and environmental analyses.
- Equity impacts on MPO activities
 - ◉ Discuss how planning needs are identified and prioritized for Unified Planning Work Program tasks, identifying Title VI implications of the current selection and prioritization process and strategies for mitigating disparate impacts.

- Public engagement
 - ⦿ Discuss the use of strategies to engage with minority and low-income populations during the outreach process for the MPO's most recent RTP. Gauge the effectiveness of these strategies and identify potential amendments to the Public Participation Plan if necessary.
 - ⦿ Provide updates to the Community Contacts database on the MassDOT Engage platform.
 - ⦿ Consider the use of virtual public involvement strategies for engaging Title VI populations.
- Complaints
 - ⦿ Review the location and availability of MPO complaint forms at the points of contact with the public.

The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center containing the text. The colors range from light, pale greens to more vibrant, saturated greens and yellows. The circles are semi-transparent, allowing the ones behind them to be visible.

Title VI

Chapter One

INTRODUCTION

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” To fulfill this mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each recipient by issuing applicable rules, regulations, or requirements.

As federal agencies, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) require their funding recipients to develop Title VI programs and to report regularly on the status and implications of program activities. FHWA’s Title VI/Nondiscrimination Program pertains to those populations protected by Title VI and populations protected by other federal regulations that prohibit discrimination based on sex, age, English proficiency, income, and disability.

As a subrecipient of FTA and FHWA funding through the Massachusetts Department of Transportation (MassDOT), the Boston Region Metropolitan Planning Organization (MPO) must submit Title VI reports to MassDOT documenting the implementation of the MPO’s Title VI Program. MassDOT passes Title VI reporting requirements to the MPO, requiring either an annual report or triennial report, as necessary. This annual report addresses those recommendations and demonstrates the MPO’s compliance with MassDOT’s work plan.

The federal civil rights statutes, executive orders, and regulations that protect these populations are based on the authorizations listed below:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166—Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 12898—Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- The Americans with Disabilities Act
- Title 23 (Section 324) of the US Code—Prohibition of discrimination on the basis of sex
- The Age Discrimination Act of 1975

As a subrecipient of federal funding, the Boston Region MPO is required to comply with these mandates. The MPO meets its compliance requirements through its Transportation Equity (TE) Program, which includes the MPO's Title VI Program. The TE Program also more broadly addresses the transportation needs of populations protected under the mandates discussed above; analyzes the effects of the MPO's activities and investments; and undertakes public engagement efforts to meaningfully involve populations protected under federal regulations in the MPO's planning process.

Chapter Two

RESPONSE TO MASSDOT TITLE VI WORK PLAN RECOMMENDATIONS

MASSDOT 2020 TITLE VI WORK PLAN

For federal fiscal year (FFY) 2020, the Massachusetts Department of Transportation (MassDOT) prepared a work plan for the Boston Region Metropolitan Planning Organization (MPO) that provides recommendations to set the parameters of Title VI reporting and to focus the efforts of the MPO's staff. The recommendations cover several components of the MPO's Title VI Program:

- Notice of nondiscrimination rights and protections
- Language access for people with limited English proficiency (LEP)
- Equity analyses
- Public engagement
- Selection and prioritization of tasks in the Unified Planning Work Program (UPWP)
- Title VI complaints

The remainder of this chapter contains MassDOT's comments and recommendations, followed by the MPO staff's responses.

MASSDOT COMMENTS AND RECOMMENDATIONS, AND MPO RESPONSES

NOTICE OF NONDISCRIMINATION RIGHTS AND PROTECTIONS

MassDOT Recommendation

Please review the contact person and contact details on your organization's Notice of Nondiscrimination Rights, and update if necessary. Please also ensure the Notice of Nondiscrimination Rights is available at each initial point of contact between the public and your organization (e.g., in your organization's physical offices in an easy-to-access location, on your organization's website(s), or in planning documents).

MPO Response

The MPO's contact person and contact details on the Notice of Nondiscrimination Rights are up to date.

MPO staff has made notices of nondiscrimination available to the public at points where the public has contact with the MPO, including at all MPO meetings and other public events, on the MPO's website, agendas for MPO-hosted meetings, MPO emails, and documents supported by MPO funding (including certification documents), and at the front desk of the MPO's office. Per the MPO's standard practice, the notice of nondiscrimination is available in the six most widely spoken non-English languages in the Boston region. See Appendix A for documentation of the dissemination of these notices.

LANGUAGE ACCESS

Tracking the Use of Multilingual Online Content

MassDOT Recommendation

Please consider the current utilization of non-English materials on your organization's website by the public. Should your organization have data available, consider the utilization of non-English materials by language compared to identified LEP populations in your service area, making note of any anticipated needs to 1) provide translations into new languages or 2) provide targeted outreach to linguistic communities notifying them of the availability of materials. Should no information be available, identify the barriers to the collection of data concerning utilization of online resources by LEP individuals and steps your organization is taking towards collecting this information.

MPO Response

To better track the number of times website visitors access online materials in non-English languages, the MPO staff refined the configuration of Google Analytics on its website in May 2017.¹ There are three indicators the MPO staff can extract from Google Analytics data, each of which has its own strengths and limitations: the language setting of a visitor's web browser; the number of downloads of translated documents; and the use of the Google Translate widget that is embedded in every page of the site. By tracking all three indicators, the MPO staff gain a more complete view of how many website visitors who are not fluent in English access the site and how they interact with it.

MPO staff examined Google Analytics data for FFY 2019 (October 1, 2018, to September 30, 2019). As with all websites, a certain proportion of visitor sessions were initiated by legitimate web indexing services (web crawlers) or automated contact form submission software (spambots), or were attempts to probe site weaknesses. For the MPO's website, this proportion for FFY 2019 is estimated to be about one percent, an improvement from about five percent of website visitors in FFY 2018. Because these "visitors" would distort the data analysis, their records were excluded. MPO staff visitors were also excluded. The remaining visitors and their web sessions are referred to here as "valid" visitors or sessions.²

To better track the use of the MPO site by users in the Boston region, for FFY 2019 MPO staff identified valid visitors whose browsers were located in Massachusetts. Google Analytics cannot identify only those within the Boston region; however, of the 12,534 visitors, most appear to come from eastern Massachusetts. Although this is an imperfect measure of the website's use by Boston-area residents, it is an improvement over the data used in last year's annual report, which analyzed data from web browsers that could be located anywhere in the world. All data in this report reflect this change in data analysis.



1 While it is impossible to know if website visitors meet the federal definition of "people with LEP," it can be assumed that people who access translated documents or translate the website using a configured browser or the Google Translate widget are not fluent in English. This term—"not fluent in English"—will be used in the context of this section's discussion to distinguish people who lack fluency from "people with LEP" as defined by federal guidelines.

2 According to Google Analytics, a session is "a group of user interactions with your website that take place within a given time frame. For example a single session can contain multiple page views, events, social interactions, and ecommerce transactions." One visitor can open multiple sessions, over one day or many days. For the MPO staff's purposes, this is the most useful metric for analyzing website traffic based on browser configuration and use of the Google Translate widget. ("How a Web Session is Defined in Analytics," Analytics Help, accessed November 15, 2019, <https://support.google.com/analytics/answer/2731565?hl=en>.)

Language Setting of Visitors' Web Browsers

Google Analytics tracks the language setting of each web browser that visits the MPO's website. Each browser defaults to requesting web pages in the language set on the computer's operating system (OS) or the language of the web browser's interface, though visitors may set their web browser to request web pages in any language of their choosing. For example, a browser whose menus and dialogues are in Chinese may nonetheless be set to request web pages in English and vice versa. Taking the language setting at face value, one can assume that visitors to the site whose browser requests a language other than English do not speak English well. However, visitors may simply use the default language setting of their browser, even if they speak a different language.

There is no relationship between the language setting of the web browser and the visitor's language proficiency as defined by the United States Census Bureau. Therefore, the browser configuration provides, at best, an approximation of the language the visitor prefers to read in, rather than an indication of his or her proficiency in the English language.

The final count of valid sessions for which a language was identified was 18,973. In approximately 99 percent of the sessions (18,778 sessions) the web browsers were configured to English. The majority of non-English web browsers were configured to Chinese (116 or 0.6 percent). Table 1 shows the number and percent of valid sessions for the non-English languages to which visitors configured their web browsers.

Table 2.1
Language Configuration of Web Browsers: FFY 2019 Web Sessions on the Boston Region MPO's Website

Language^a	Number of Valid Sessions	Percent of Total Valid Sessions — All Languages^b	Percent of Total Valid Sessions — Non-English Languages
English	18,778	99.0%	N/A
Chinese	116	0.6%	59.5%
Spanish	18	0.1%	9.2%
French	17	0.1%	8.7%
German	7	0.0%	3.6%
Italian	4	0.0%	2.1%
Japanese	8	0.0%	4.1%
Korean	5	0.0%	2.6%
Portuguese	4	0.0%	2.1%
Bulgarian	6	0.0%	3.1%
Dutch	2	0.0%	1.0%
Romanian	3	0.0%	1.5%
Russian	2	0.0%	1.0%
Czech	1	0.0%	0.5%
Hebrew	1	0.0%	0.5%
Norwegian	1	0.0%	0.5%
Total Valid Sessions	18,973	100.0%	100.0%
Total Valid Non-English Sessions	195	1.0%	N/A

^a Of the languages into which the MPO translates vital documents, Haitian Creole was the only one to which no visitors configured their web browser. It is also possible that Haitian Creole speakers could be setting their browsers to French, as French was historically taught in Haiti.

^b Numbers do not add to 100 percent due to rounding.

FFY = federal fiscal year. MPO = Metropolitan Planning Organization.

Source: Google Analytics.

Downloads of Translated Documents

The MPO translates its vital documents into several languages based on its 2017 language assistance plan: Spanish, Chinese (traditional and simplified), Portuguese, Haitian Creole, and Vietnamese. Table 2 shows the number of vital documents that were downloaded in PDF and HTML formats in FFY 2019. (Because MassDOT provides translations of the notice of nondiscrimination and complaint forms and procedures in additional languages, those that

were downloaded in other languages besides those five are also included in Table 2.) These figures indicate a demand for documents in languages for which the MPO currently provides translations, but these figures do not reveal whether there is a demand for documents in other languages. It also does not indicate which documents visitors would prefer to access if translations were available.

Table 2.2
Number of Downloads of Translated Documents from the Boston Region MPO's Website: FFY 2019

Language	PDF and HTML Document Downloads
Simplified Chinese	22
Spanish	9
Portuguese	7
Traditional Chinese	6
Haitian Creole	6
Russian	1
Vietnamese	0
Total	51

MPO = Metropolitan Planning Organization.
Source: Google Analytics.

Use of the Google Translate Widget

The Google Translate widget is available on every page of the MPO's website. Visitors may use this tool to translate the text on the site into any language that Google makes available on the widget. While the translations are not perfect, given the technical nature of the MPO's planning topics, the widget does allow the MPO to significantly expand the number of languages in which visitors can access the website without significantly expanding the resources required to translate each page individually. One drawback of the widget is that it does not allow for the identification of the web pages or documents that were downloaded by visitors.

Google Translate was used 18 times by website visitors during FFY 2019. Sixteen of those times the visitors translated into English, presumably because their computers' default language was not English. Twice visitors translated the site into Chinese.

Discussion

The results from the analysis, the number of downloads of translated documents, and the use of configured web browsers suggest that there is a need for translation services, even though visitors who are not fluent in English do not represent a significant proportion of the website's total traffic. Chinese translation appears to be the mostly widely requested. Web browser settings and Google Translate use are the best available indicators for which languages visitors speak. Among the top five web browser configurations, French and German are not languages into which the MPO currently translates documents (although Haitian Creole speakers could be translating into French, as French was historically taught in Haiti).

These results are mostly consistent with the non-English safe harbor languages spoken in the Boston region. In this region, the most commonly spoken non-English language is Spanish, followed by Chinese, Portuguese, French Creole, and Vietnamese. French is the ninth most spoken non-English language, while German is not a safe harbor language.³

Based on this analysis, the MPO does not need to change the languages into which it translates vital documents. However, MPO staff have begun, and will continue, to increase efforts to disseminate these documents to people with LEP. (See the following section for more details.) In addition, MPO staff also translate outreach materials into various appropriate non-English languages when attending events where they expect to meet non-English speakers.

Outreach for Regional Transportation Plan (RTP)

MassDOT Recommendation

Please discuss the use of languages other than English during the outreach process for your organization's most recent RTP. Identify which strategies were utilized, and gauge the effectiveness of various strategies by quality and/or quantity of communications.

MPO Response

Outreach for *Destination 2040*, the MPO's most recent RTP, largely took place during the development of the Needs Assessment, which gathered information about the transportation needs of residents of the Boston region. During this process, MPO staff distributed an electronic survey asking stakeholders for input about transportation needs and opportunities for improving transportation. The survey was translated into Spanish, Chinese (simplified and traditional), Portuguese, and Haitian Creole. The survey was distributed via the MPO's email list, including subscribers on the MPO's equity email list, which includes approximately 42 organizations that represent various LEP populations. The MPO did not receive any responses in languages other than English.

³ These data are from the 2010–14 American Community Survey.

Toward the end of the development of *Destination 2040*, MPO staff identified some populations that they had been less successful in engaging, including the LEP population. Staff is working on building relationships with these populations and rethinking the approach to ensuring that LEP populations have meaningful opportunities to participate. To that end, during the public comment period for *Destination 2040*, MPO staff exhibited at events where LEP populations (as well as other equity populations) live in the region, including the following:

- Dewey Square Farmers Market (Boston) (predominant non-English language: Chinese)
- Brighton Square Farmers Market (Boston) (predominant non-English languages: Spanish, Russian, Chinese, and Portuguese)
- Framingham Farmers Market (Framingham) (predominant non-English languages: Spanish and Portuguese)
- Civic engagement meetings at Union Capital Boston (a nonprofit civic engagement group)
 - Maverick Square (predominant non-English languages: Spanish and Portuguese)
 - Grove Hall (predominant non-English languages: Spanish and Portuguese)
 - Mattapan (predominant non-English languages: Spanish, Haitian Creole, and French)

MPO staff talked to a total of 103 people at these six events. Out of respect for peoples' privacy, as a rule staff do not ask demographic questions in person, so the language predominately spoken by those people is not known.

Additionally, staff created a new *Destination 2040* brochure that described the vision, goals, and types of projects and investment programs included in the draft document. This brochure was translated into the six most common languages spoken in the region, and shared with members of the public at the outreach events. Of the six non-English language versions, the Spanish version was the most frequently taken. In addition, staff developed a survey to get input on the draft *Destination 2040* document, also available in the six most common languages, which was posted on the MPO website. The MPO did not receive any responses in languages other than English. The digital flyer and survey were sent directly to stakeholder organizations.

People with LEP have been among the most difficult populations for the MPO to engage. Providing surveys in non-English languages is an important strategy, but it has not proven sufficient. As described in the previous paragraph, MPO staff adopted the strategy of meeting people with LEP where they are and providing materials in their native language, such as at events in communities where census data indicate there are high shares of people with LEP.

In addition, staff are building relationships with organizations that serve people with LEP and providing interpreters as necessary when meeting with these groups. MPO staff are exploring ways to better evaluate the effectiveness of these strategies as well.

EQUITY ANALYSES

RTP Title VI Analysis

MassDOT Recommendation

Please discuss any specific changes made to the most recent RTP equity analyses due to improved attention to Title VI analysis efforts since the previous RTP cycle. Please also identify any notable shortcomings in these analyses.

MPO Response

The MPO conducts an equity analysis for the RTP, referred to as a Disparate Impact and Disproportionate Burden (DI/DB) analysis. Since 2017, MPO staff has been working to develop a DI/DB Policy for the RTP. The policy will allow the MPO to identify potential future disparate impacts to minority populations and disproportionate burdens to low-income populations that may result if all of the projects in the Recommended Plan are implemented by the horizon year of the RTP (20 years in the future).

On May 2, 2019, the MPO approved a draft DI/DB Policy, concluding phase one of the MPO's effort to develop the policy. The draft policy identifies when implementation of the projects in the RTP, in aggregate, would likely result in an impact to minority or low-income populations; phase two will develop and recommend thresholds that determine when an impact is significantly high and adverse and therefore would be a disparate impact or disproportionate burden.

Phase one took place in 2018 and 2019. It consisted of a comprehensive public engagement process, updates to the metrics analyzed in the DI/DB analysis, identification of the forecasting error for each metric, and the development of the draft policy.⁴ Public engagement consisted of three meetings of a stakeholder working group and a public workshop that took place between May and July of 2018. MPO staff received input on impacts that the MPO staff could assess for disparate impacts and disproportionate burdens.



⁴ DI/DB metrics are analyzed using a regional travel demand model. Each metric has a certain amount of forecasting error associated with it due to the complexity of the modeling process and variations in the inputs used to model each metric.

Further, the stakeholder working group provided input on how the MPO should define when an impact is disproportionately high and adverse. Staff also identified the forecasting error for each metric to help determine when impacts would be statistically likely to occur. The results of this work were incorporated into the draft DI/DB Policy.

The draft policy was used for the first time in *Destination 2040*. One of the challenges staff encountered was that just five out of eleven Recommended Plan projects were included in the analysis. The other six projects would not change the capacity of the transportation network and so could not be modeled and analyzed for disparate impacts and disproportionate burdens. Future MPO work could explore off-model methods for identifying potential future disparate impacts and disproportionate burdens so that projects that cannot be modeled can be part of the analysis.

Next Steps

As part of phase two of developing the DI/DB Policy, in FFY 2020 MPO staff will complete a study, the Disparate Impact Metrics Analysis, to determine when an impact from MPO investments to minority or low-income populations would be considered significantly high and adverse. The results will be used to update the draft DI/DB Policy. Staff will seek endorsement from the MPO board, and the endorsed policy will be used in the development of subsequent RTPs.

Title VI and Environmental Justice (EJ) Analyses

MassDOT Recommendation

While Title VI and EJ considerations have some overlap, there are considerable differences in the applicability, measurement, and use of Title VI and environmental justice analyses. Please discuss how your organization's equity analyses distinguish these areas of analysis. If necessary, make proposals for improving the distinction between these analyses for the upcoming certification document cycle.

MPO Response

The MPO completes several different Title VI and EJ analyses. Title VI analyses include

- an analysis of the distribution of federal funds for transit investments;
- demographic profiles of Title VI populations; and
- an analysis of impacts that may result from investments in the aggregate (disparate impact analysis), conducted for both MPO investments only and for MassDOT and MPO investments combined.

EJ analyses include an analysis to identify potential disproportionately high and adverse effects on minority and low-income populations that may result from MPO investments or from MPO and MassDOT investments.

The MPO makes every effort to distinguish between equity analyses for low-income and minority populations. Two of the Title VI analyses—the distribution of federal funds analysis and the demographic profiles—are required only under Title VI regulations. The third—the disparate impact analysis—is conceptually similar to the EJ analysis; therefore, the MPO uses a similar methodology for both analyses in the RTP. Together they are referred to as a DI/DB analysis. Both use the MPO’s travel demand model to assess investments for potential future disparate impacts and disproportionate burdens.

While the methodology is similar, low-income populations are analyzed separately from minority populations and the results for each population are reported separately to distinguish between EJ and Title VI requirements. In addition, in the draft DI/DB Policy the MPO differentiates between how to address any disparate impacts or disproportionate burdens to reflect the differences between Title VI and EJ regulations. If the DI/DB analysis indicates a potential future disparate impact, MPO staff will determine whether there is a substantial, legitimate justification for implementing the program of projects as proposed, and present the conclusion to the MPO board. Staff will also determine if there are one or more alternatives that meet the same goals of the original projects but that have fewer disparate impacts. If there are, staff will present the alternatives to the MPO board. If the DI/DB analysis indicates a potential future disproportionate burden for at least one metric, the MPO staff will recommend to the MPO board steps to take to avoid, minimize, or mitigate these impacts, where practicable.

MPO staff also consider both Title VI and EJ guidance when determining which metrics to assess in the DI/DB analysis. The same metrics are assessed for their impacts on the minority populations and low-income populations. These include travel times; access to jobs, healthcare, education, and retail; and environmental metrics. Title VI regulations do not specify which impacts the MPO should assess, so these metrics are largely based on recommendations from federal EJ guidance as well as the metrics that the MPO’s regional travel demand model is able to analyze.

The MPO is currently in the early stages of developing a DI/DB analysis for projects programmed in the TIP, which would be similar to the analysis that is done for the RTP. MPO staff will ensure that the TIP analysis differentiates between impacts on minority and low-income populations. The current analysis used for the RTP, which is more qualitative in nature and focuses on the distribution of projects rather than the projected impacts, reports results for minority and low-income populations separately. Similarly, the equity analysis for the UPWP reports results for the minority and low-income populations separately.

As a matter of practice, the MPO also strives to integrate EJ principles throughout the MPO's entire planning process as much as is practicable. To that end, MPO staff also produce demographic profiles for low-income populations, and conduct a separate analysis of the distribution of funding for transit investments for low-income populations.

EQUITY IMPACTS ON MPO ACTIVITIES

MassDOT Recommendation

Please discuss how identified planning needs (e.g. from RTPs, previous studies, or municipal/outside agency requests) are selected and prioritized for both standalone and programmatic UPWP tasks and subtasks. If there is a codified process, your organization is welcome to simply link to or provide that documentation. In either instance, identify Title VI implications of the current selection and prioritization processes and strategies for mitigating disparate impacts.

MPO Response

UPWP Study Selection Process

The MPO's process for creating the UPWP and selecting discrete studies is documented here: <https://www.bostonmpo.org/data/pdf/plans/UPWP/FFY-2020-UPWP-20190827.pdf>. (See pages 2-3 to 2-5.) The public outreach component of developing a new UPWP seeks to include public input from Title VI and EJ populations.

Transportation Equity (TE) Program

In addition to the discrete studies that the MPO programs, the UPWP documents the work to be undertaken in the MPO's ongoing programs. MPO staff develop budgets and work tasks for these continuing programs that are carried out in the subsequent FFY. The MPO's TE Program is one of these ongoing programs. One of the core objectives of the TE Program is to perform activities related to FTA and FHWA Title VI, EJ, and other nondiscrimination compliance. The other core objectives are to establish the MPO's equity goal and to help the MPO meet this goal through project and program funding decisions, and to ensure that equity populations—including Title VI populations—have meaningful opportunities to participate in the MPO's planning process.

While most of the tasks in the TE Program remain the same year to year, they may vary based on needs identified in the RTP, input from public outreach, input from MassDOT, federal guidance from the MPO's certification review, and recommendations from previous studies. Priorities are evaluated based on available staff, budget, and the critical nature of each task. Generally, the MPO prioritizes federally required analyses (such as disparate impact analyses), requests from the MassDOT Office of Diversity and Civil Rights, and federal certification

recommendations. TE Program staff also provide sufficient support for public engagement activities with protected populations, as well as work efforts to help the MPO meet its transportation equity goal and objectives as defined in its current RTP.

Implications of the Current Selection and Prioritization Processes

While the MPO often programs discrete studies that address transportation equity or Title VI concerns, to date the MPO has considered whether a study addresses the transportation equity goal. Staff are exploring new ways to integrate equity concerns systematically in the study selection process. Any revisions to how equity is considered in the study selection process could take into account the results from the analysis of the distribution of UPWP studies among Title VI and EJ populations. (See Appendix D of the UPWP.)

Mitigating Disparate Impacts

Performing an equity analysis of discrete studies has historically been challenging for the MPO because most studies are not located in a particular geographic area, as are MPO-funded transportation projects. Therefore, it is more difficult to identify the population(s) that will benefit from each study. Although, this task will likely become easier once the MPO's UPWP tracking database is complete. Because studies are generally regional in nature, a thorough analysis of their impacts on equity populations will likely always be limited in its ability to account for impacts on Title VI populations.

PUBLIC ENGAGEMENT

Public Engagement of Minority and Low-Income Populations

MassDOT Recommendation

Please discuss the use of strategies to engage with minority and low-income populations during the outreach process for your organization's most recent RTP. Gauge the effectiveness of various strategies by quality and/or quantity of communication, and consider identifying potential amendments to your organization's Public Participation Plan (PPP) if necessary.



MPO Response

Most of the outreach for *Destination 2040* took place during the development of the Needs Assessment, which identified transportation needs of the Boston region through public outreach and data analysis. In-person outreach largely consisted of partnering with various organizations to get their input on transportation needs. These organizations included Transportation Resources, Information, Planning & Partnership for Seniors (TRIPPS), the Boston North Regional Coordinating Council, and the Boston Disabilities Commission. MPO staff also broadly distributed an electronic survey asking the public and stakeholders about transportation needs. It included questions about transportation needs of equity populations. In an attempt to distribute the survey to as many people as possible, it was posted on the MPO website, sent out via email to the MPO's email list (which contains approximately 3,000 subscribers), posted on Twitter, and included in an MPO blog post. Four percent of respondents identified as minority and 18 percent were considered as having low incomes.



As described in Section 2.2.2, staff decided to change the strategy for getting input from populations that were underrepresented in outreach activities for *Destination 2040*. During the public comment period, MPO staff exhibited at events where they believed they could best get input from these populations, in particular minority, low-income, and LEP populations. As stated in Section 2.2.2, they exhibited at several farmers markets in the region and attended meetings with civic engagement groups. While staff did not ask participants their race, ethnicity, or income, staff specifically sought to participate in events in neighborhoods that census data showed had residents with low incomes and high shares of minority populations.

MPO staff have continued this strategy of attending events where they are likely to encounter people who are members of these populations.

Thus far, staff have found this strategy to be a more effective means of getting input from these populations than distributing surveys. Staff talked with a total of 103 people at the farmers markets and civic engagement meetings, many of whom had never interacted with the MPO. MPO staff are using a similar strategy to get input on changes to the MPO's TIP project selection criteria. Some of the groups first visited during the RTP public comment period were again visited for input on the TIP criteria. Going forward, staff will continue this engagement and identify additional events at which to participate and organizations that

staff can effectively partner with to expand the reach of the MPO. Further, staff are exploring strategies to better understand the effectiveness of MPO outreach and learn more about who is being engaged. These evaluations will help staff plan for future public engagement activities.

The Boston MPO last updated its PPP in 2019. This year, staff will review whether additional updates are necessary to reflect changes in the MPO's approach to conducting outreach to engage equity populations.

Updates to Community Contacts on Engage Platform

MassDOT Recommendation

Please continue to work with ODCR [MassDOT Office of Diversity and Civil Rights] on updates to the Community Contacts database on the MassDOT Engage platform.

MPO Response

Over the course of FFY 2020, MPO staff will update all out-of-date community contacts on the MassDOT Engage platform. Staff will focus on ensuring that the point of contact for existing community contacts is up-to-date, as well as adding new community contacts based on the MPO's contact list.

Virtual Public Involvement

MassDOT Recommendation

Please consider the utilization of virtual public involvement (VPI) strategies for engaging Title VI populations in your organization's region. Which VPI strategies are currently used? How are currently utilized strategies engaging Title VI populations, and how could they be improved? Which additional strategies are of interest to Title VI populations in your organization's region?

MPO Response

Currently, the MPO uses Twitter to promote MPO meetings, other MPO-hosted events, and transportation events of interest around the region;



distribute MPO surveys; share MPO studies; and notify the public of documents available for public review and comment. Staff also live-tweet all MPO meetings. All MPO surveys are available online through the survey platform Survey Monkey, including translations. In addition, MPO staff use visualizations and videos in public presentations to illuminate study locations.

The MPO also has a number of interactive applications on its website, including the following:

- TIP database, an interactive map of projects programmed in the TIP
- Performance Dashboard, which provides visualizations of transportation data, including Title VI and EJ populations
- Pedestrian Report Card Assessment, which allows users to explore assessments of pedestrian infrastructure on selected roadway segments and intersections
- Needs Assessment Application, which visualizes key data inputs used in the RTP Needs Assessment, including demographic data
- Vehicle-Miles-Traveled and Emissions Browser, which allows the user to browse vehicle-miles-traveled, vehicle-hours-traveled, and emissions data for cities and towns in the Boston region
- All-Hazards Planning Application, which allows users to view the region's transportation network relative to natural-hazards zones, including those subject to flooding, storm surges, and sea level rise
- 2015 Express Highway and Arterial Performance Dashboards, which graphically display peak-period congestion for expressways and arterials in the Boston region



MPO staff are seeking out other opportunities for using VPI to better engage the public with the MPO process. Staff are exploring using ArcGIS StoryMaps—an ESRI-hosted mapping and story-telling platform—to communicate to the public about how a project gets programmed in the TIP. MPO staff will consider the usefulness of StoryMaps as a platform for other MPO products based on the success of this initial test. A tool like StoryMaps can also facilitate communication about the TIP (and potentially other MPO activities) to the general public, including Title VI populations.

Other strategies to improve outreach to Title VI populations are also being considered. As the MPO has access to video equipment in its new location in the State Transportation Building's Transportation Board Room, staff could explore streaming MPO meetings online. Live-tweeting and live-streaming could also make it easier for people to follow along with MPO meetings by eliminating the need for them to take the time and expense required to travel to the meeting, broadening the reach of the MPO to previously unengaged communities and population groups. These new strategies, as well as existing ones, could be supported with increased in-person outreach to help make Title VI populations more aware of these opportunities for participation. MPO staff could further investigate which VPI strategies are of interest to Title VI populations in the region.

COMPLAINT FORMS AND PROCEDURES

MassDOT Recommendation

Please review the location and availability of complaint forms at primary points of contact between the public and your organization (e.g., in your organization's physical offices in an easy-to-access location and on your organization's website(s)). Are complaint forms easy-to-find and available in relevant languages? Are descriptions of complaint processes also available at these locations and in relevant languages?

MPO Response

MPO staff have downloaded MassDOT's translated complaint form and procedures and have made them available on the MPO's website. MassDOT has translated the complaint forms and procedures into more languages than is the standard practice for the MPO, and all of these translations have been made available to the public. See Appendix B for documentation of the dissemination of the MPO's complaint form and procedures.

The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center containing the text. The colors range from light, pale greens to more saturated, olive greens and yellows. The circles are semi-transparent, creating a layered effect.

Title VI



Appendix A

The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center. The text 'Title VI' is centered within this largest circle.

Title VI

APPENDIX A— DISSEMINATION OF THE NOTICE OF NONDISCRIMINATION

Figure A.1
Notice of Nondiscrimination



Additional Information

To request this information in a different language or in an accessible format, please contact

Title VI Specialist
Boston Region MPO
10 Park Plaza, Suite 2150
Boston, MA 02116
civilrights@ctps.org

Complaint Filing

To file a complaint alleging a violation of Title VI or other federal nondiscrimination law (based on race, color, national origin [including limited English proficiency], sex, age, or disability), contact the Title VI Specialist (above) within 180 calendar days of the alleged discriminatory conduct.

To file a complaint alleging a violation of the state's Public Accommodation Law (based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry) or the Governor's Executive Order 526, section 4 (based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status [including Vietnam-era veterans], or background), contact the Title VI specialist (above) within 300 calendar days of the alleged discriminatory conduct, or

**MassDOT Title VI Specialist
Office of Diversity and Civil Rights**
10 Park Plaza, Suite 3800
Boston, MA 02116
Massdot.civilrights@state.ma.us
857.368.8580 (voice)

Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal "Title VI/Nondiscrimination" Protections

The Boston Region Metropolitan Planning Organization (MPO) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, Federal Transit Administration, or both, prohibit discrimination on the basis of age, sex, and disability. The Boston Region MPO considers these protected populations in its Title VI Programs, consistent with federal interpretation and administration. In addition, the Boston Region MPO provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with U.S. Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

The Boston Region MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 section 92a, 98, 98a, which prohibits making any distinction, discrimination, or restriction in admission to, or treatment in a place of public accommodation based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry. Likewise, the Boston Region MPO complies with the Governor's Executive Order 526, section 4, which requires that all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status (including Vietnam-era veterans), or background.

如果需要使用其它语言了解信息，请联系波士顿都会规划组织 (Boston Region MPO) 《民权法案》第六章专员，电话 857-702-3700。

如果需要使用其他語言瞭解資訊，請聯繫波士頓都會規劃組織 (Boston Region MPO) 《民權法案》第六章專員，電話 857-702-3700。

Si yon moun vle genyen enfòmasyon sa yo nan yon lòt lang, tanpri kontakte Espesyalis Boston Region MPO Title VI la nan nimewo 857-702-3700.

Caso estas informações sejam necessárias em outro idioma, por favor, contate o Especialista em Título VI da MPO da Região de Boston pelo telefone 857-702-3700.

Если Вам необходима данная информация на любом другом языке, пожалуйста, свяжитесь со Специалистом по Титулу VI в Boston Region MPO по тел: 857-702-3700.

Si necesita esta información en otro idioma, por favor contacte al especialista de la Boston Region MPO del Título VI al 857-702-3700.

Nếu quý vị cần thông tin bằng tiếng khác, vui lòng liên hệ Chuyên viên Luật VI của MPO Vùng Boston theo số điện thoại 857-702-3700.

Figure A.2
Notice of Nondiscrimination at MPO Office Entrance and MPO Meetings



Figure A.3
Notice of Nondiscrimination in MPO Office Meeting Room

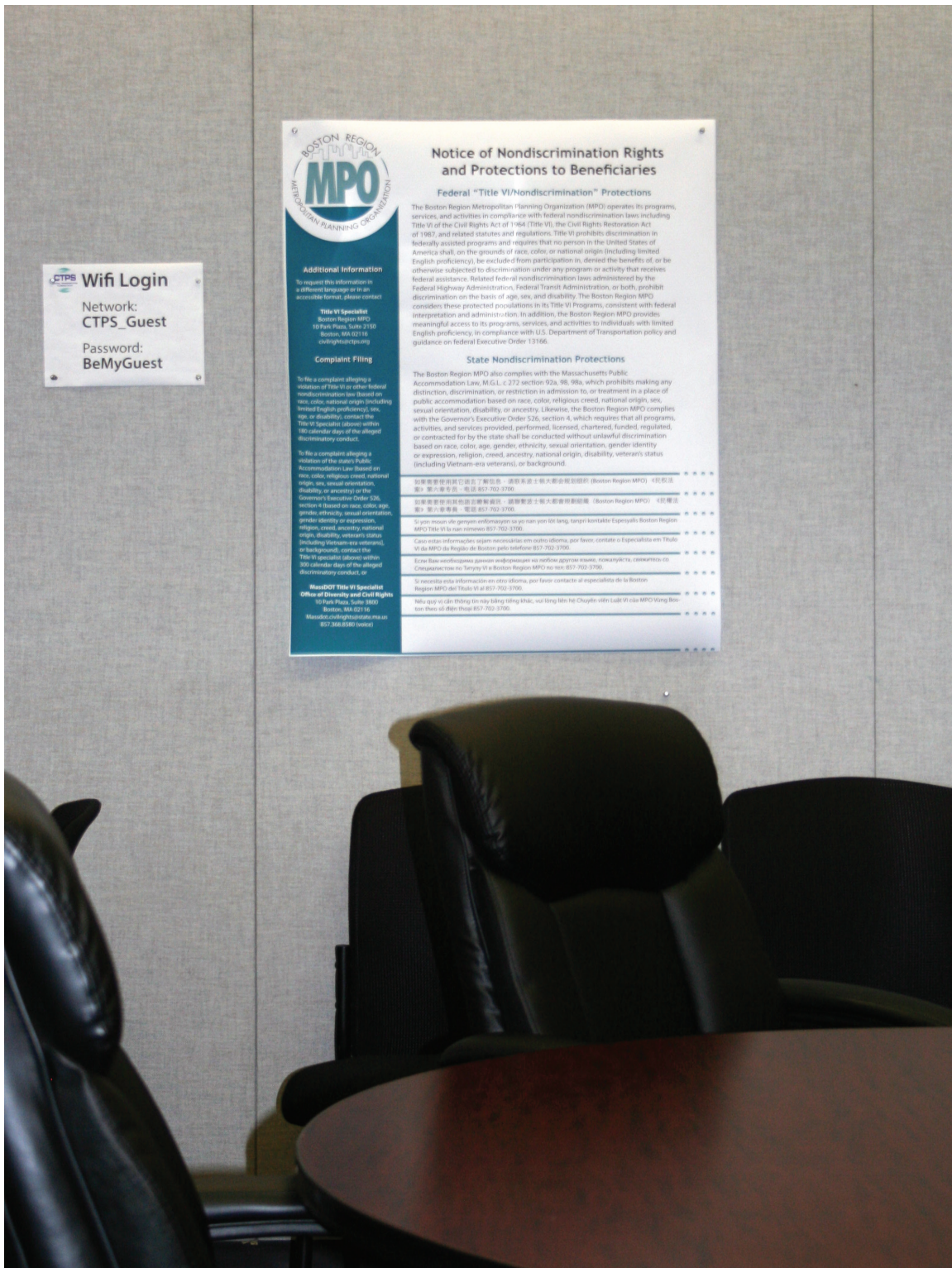


Figure A.4

Notice of Nondiscrimination on Agendas—Boston Region MPO Meeting Agenda

Boston Region Metropolitan Planning Organization
Meeting Agenda for January 9, 2020

2 of 2

- 12. Update on Transportation Priorities in the Minuteman Advisory Group on Interlocal Coordination (MAGIC) Subregion,** Adam Duchesneau, Sudbury Planning and Community Development and MAGIC Chairman, and Lizzie Grobbel, MAPC staff: Discussion of planning priorities in the MAGIC subregion, 20 minutes
- 13. Members' Items:** Reports and notices by MPO members, including regional concerns and local community issues, 5 minutes

Meeting materials are posted on the MPO's meeting calendar webpage at ctps.org/calendar/month.

Times reflect the expected duration of each item and do not constitute a schedule.

Meeting locations are accessible to people with disabilities and are near public transportation. Upon request (preferably two weeks in advance of the meeting), every effort will be made to provide accommodations such as assistive listening devices, materials in accessible formats and in languages other than English, and interpreters in American Sign Language and other languages. Please contact the MPO staff at 857.702.3700 (voice), 617.570.9193 (TTY), 617.570.9192 (fax), or eharvey@ctps.org.

The Boston Region Metropolitan Planning Organization (MPO) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, Federal Transit Administration, or both, prohibit discrimination on the basis of age, sex, and disability. The Boston Region MPO considers these protected populations in its Title VI Programs, consistent with federal interpretation and administration. In addition, the Boston Region MPO provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with U.S. Department of Transportation policy and guidance on federal Executive Order 13166.

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A complaint form and additional information can be obtained by contacting the MPO or at www.bostonmpo.org/mpo_non_discrimination. To request this information in a different language or in an accessible format, please contact:

Title VI Specialist, Boston Region MPO, 10 Park Plaza, Suite 2150, Boston, MA 02116
civilrights@ctps.org, 857.702.3700 (voice), 617.570.9193 (TTY)

Figure A.5
Notice of Nondiscrimination on MPO's Website

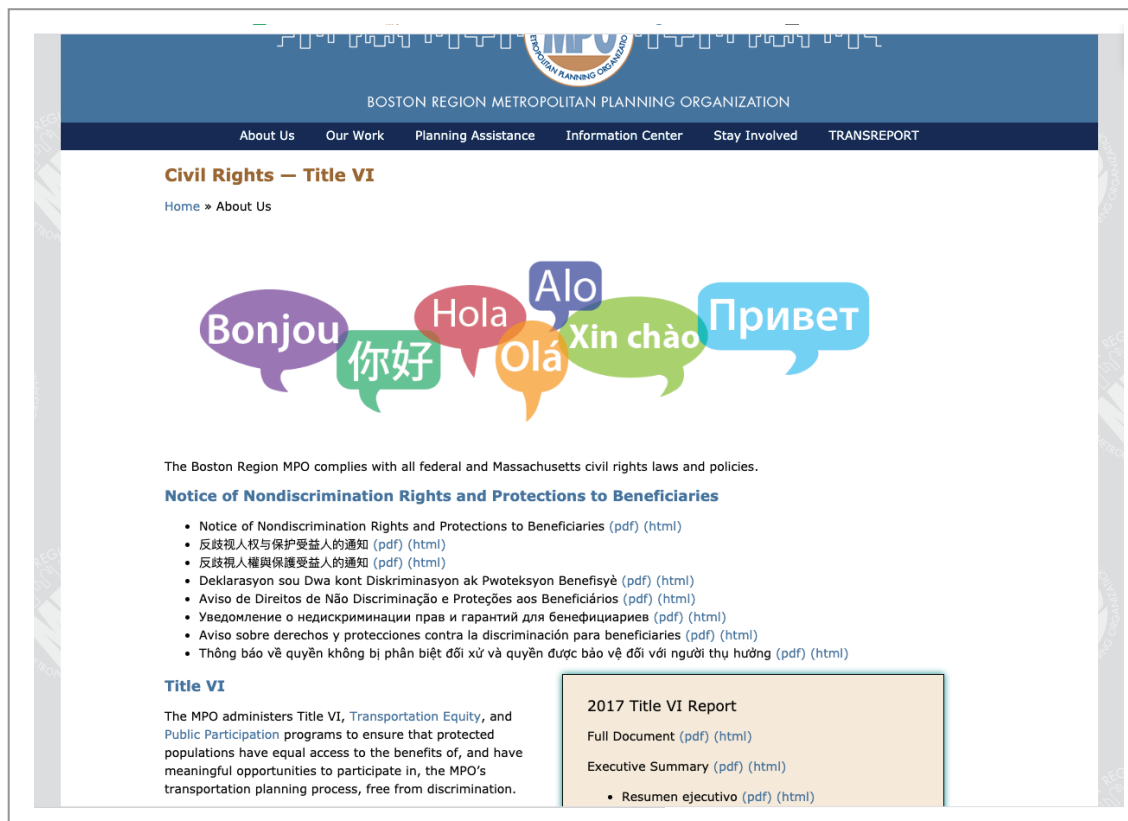


Figure A.6 Notice of Nondiscrimination on MPO Emails

Welcome. Bem Vinda. Bienvenido. Akeyi. 欢迎. 歡迎.

You are invited to participate in our transportation planning process, regardless of your race, color, national origin (including limited English proficiency), religion, creed, gender, ancestry, ethnicity, disability, age, sex, sexual orientation, gender identity or expression, veteran's status, or background. Read our [full notice](#) of rights and protections.

To request special accommodations, or if you need this information in another language, contact the MPO at 857.702.3700 (voice), 617.570.9193 (TTY) or eharvey@ctps.org (please allow 14 days).

Figure A.7

Notice of Nondiscrimination on Certification Documents

NOTICE OF NONDISCRIMINATION RIGHTS AND PROTECTIONS

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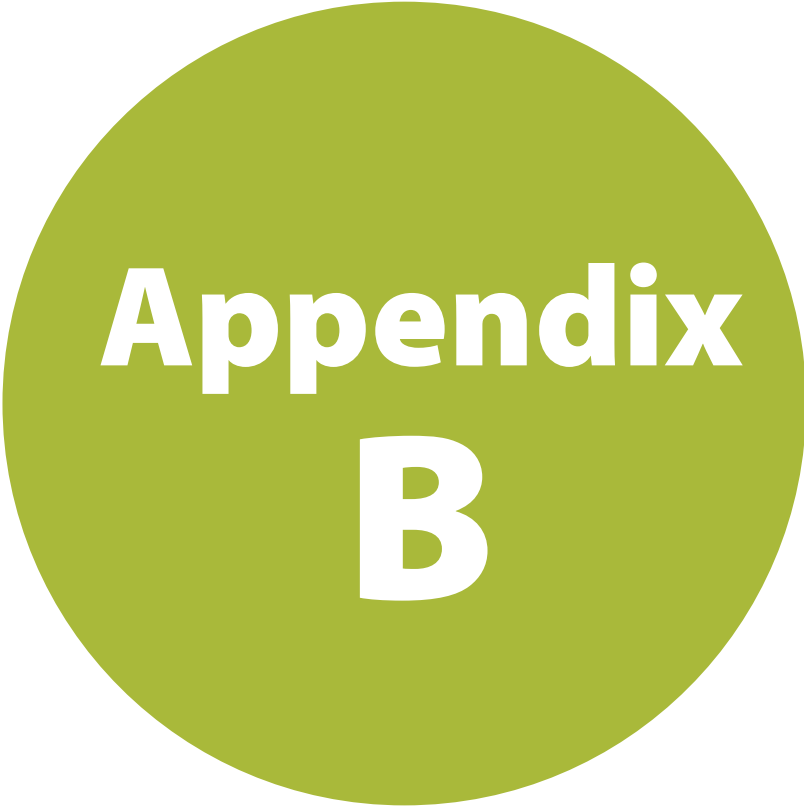
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civilrights@ctps.org
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The background features a collection of overlapping circles in various shades of green and yellow. The circles vary in size, with the largest one in the center containing the text. The colors range from light, pale greens to more saturated, olive greens and yellows. The circles are semi-transparent, creating a layered effect.

Title VI



Appendix B

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Title VI

APPENDIX B— DISSEMINATION OF COMPLAINT FORMS AND PROCEDURES

Figure B.1
Complaint Form on MPO's Website

Complaint Filing

Complaints filed under a federal law or policy (based on race, color, national origin [including limited English proficiency] sex, age, or disability) must be filed no later than 180 calendar days after the date the person believes the discrimination occurred. Complaints filed under a Massachusetts Public Accommodation Law (based on race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry) or Governor's Executive Order 526, section 4 (based on race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status [including Vietnam-era veterans], or background) must be filed no later than 300 calendar days after the date the person believes the discrimination occurred. The full complaint procedures are described in the documents to the right.

Access to MPO-sponsored Meetings

Locations for all MPO-sponsored meetings are accessible to people with disabilities and are near public transportation. Upon request (two weeks in advance), every effort will be made to provide accommodations such as assistive-listening devices, materials in accessible formats and in languages other than English, and interpreters in American Sign Language and non-English languages.

For Additional Information

Contact MPO staff to request accommodations or additional information regarding Title VI and related federal and state nondiscrimination obligations.

857.702.3700 (voice)

Older Title VI reports can be found [here](#).

- Complaint Procedures** ([pdf](#)) ([html](#))
 - Procedimiento de quejas ([pdf](#)) ([html](#))
 - 投诉程序 ([pdf](#)) ([html](#))
 - 投訴程式 ([pdf](#)) ([html](#))
 - Procedimentos de Queixa ([pdf](#)) ([html](#))
 - Pwosedi pou Pote Plent ([pdf](#)) ([html](#))
 - Quy trình khiếu nại ([pdf](#)) ([html](#))
 - Процедуры подачи жалоб ([pdf](#)) ([html](#))
 - إجراءات تقديم الشكاوى ([pdf](#)) ([html](#))
 - Procedure di ricorso ([pdf](#)) ([html](#))
 - Procédures de plainte ([pdf](#)) ([html](#))
 - ສູດສະໄໝຂໍກະແກ້ຫຼຸບຖືກລົບລ້າມ ([pdf](#)) ([html](#))
- Complaint Form** ([pdf](#)) ([html](#))
 - Formulario de queja por discriminación ([pdf](#)) ([html](#))
 - 歧视投诉表 ([pdf](#)) ([html](#))
 - 歧視投訴表 ([pdf](#)) ([html](#))
 - Formulário de Reclamação por Discriminação ([pdf](#)) ([html](#))
 - Fòmille pou Pote Plent pou Diskriminasyon ([pdf](#)) ([html](#))
 - Đơn Khiếu nại Phân biệt đối xử ([pdf](#)) ([html](#))
 - Жалоба о Дискриминации ([pdf](#)) ([html](#))
 - نموذج شكوى حول وقوع حالة تمييز ([pdf](#)) ([html](#))
 - Modulo di denuncia per discriminazione ([pdf](#)) ([html](#))
 - Formulaire de plainte pour discrimination ([pdf](#)) ([html](#))
 - ຜູ້ສະໄໝກະແກ້ຫຼຸບຖືກລົບລ້າມ ([pdf](#)) ([html](#))

Figure B.2
Complaint Form on Notice of Nondiscrimination



Additional Information

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Title VI Specialist
Boston Region MPO
10 Park Plaza, Suite 2150
Boston, MA 02116
civilrights@bcrpo.org

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Office of Diversity and Civil Rights
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Boston, MA 02116
Massdot.civilrights@state.ma.us
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Si yon moun vle genyen enfòmasyon sa yo nan yon lòt lang, tanpri kontakte Espesyalis Boston Region MPO Title VI la nan nimewo 857-702-3700.	● ● ● ●
Caso estas informações sejam necessárias em outro idioma, por favor, contate o Especialista em Título VI da MPO da Região de Boston pelo telefone 857-702-3700.	● ● ● ●
Если Вам необходима данная информация на любом другом языке, пожалуйста, свяжитесь со Специалистом по Титулу VI в Boston Region MPO по тел: 857-702-3700.	● ● ● ●
Si necesita esta información en otro idioma, por favor contacte al especialista de la Boston Region MPO del Título VI al 857-702-3700.	● ● ● ●
Nếu quý vị cần thông tin này bằng tiếng khác, vui lòng liên hệ Chuyên viên Luật VI của MPO Vùng Boston theo số điện thoại 857-702-3700.	● ● ● ●

Figure B.3
Complaint Form at MPO Office Entrance and MPO Meetings



Figure B.4
Complaint Form in MPO Office Meeting Room

