

Central Massachusetts Metropolitan
Planning Organization

Title VI PROGRAM GUIDE



CENTRAL MASSACHUSETTS
Regional Planning Commission



WHAT IS TITLE VI?

This statute of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

WHY IS IT IMPORTANT?

Federally assisted programs impact all aspects of life. This assistance by way of a grant, loan or contract, creates a legal obligation for the recipients, sub-recipients and contractors to ensure that all persons are afforded an equal opportunity to benefit and participate regardless of their race, color or national origin. It applies to all programs, services and activities that are funded, sponsored or supported by the Federal government.

WHAT IS...?

Federal Assistance refers to grants and loans of Federal funds; the grant, donation of Federal property and interests in property; the detail of Federal personnel; the sale or lease of, and the permission to use, Federal property or any interest in such property; contracts, agreements or arrangements for assistance.

TITLE VI PROGRAM COMPONENTS

The CMMPO Title VI Program includes the policies, compliance requirements, processes, procedures, methodologies and analyses that the CMMPO relies upon to guarantee an inclusive transportation planning process.



WHAT IS THE CMMPO?

The Central Massachusetts Metropolitan Planning Organization, or CMMPO for short, was established in 1976 and is responsible for the transportation planning process in the region. Working alongside 40 communities in the central Massachusetts, the CMMPO is responsible for programming the transportation funds for road improvements, transit and paratransit services, as well as pedestrian and bicycle infrastructure.



CMMPO OBLIGATIONS

1. Develop a Title VI Program.
2. Display and disseminate Title VI and civil rights information in accessible formats and languages other than English.
3. Collect and analyze demographic data.
4. Monitor and review program areas to determine the effectiveness and compliance.
5. Continued staff training and capacity building sessions.
6. Explain the procedures for filing and handling a Title VI complaint.
7. Log, track, investigate and follow-up any Title VI complaint received.
8. Provide engagement opportunities for priority populations, including persons with limited English proficiency.
9. Provide Title VI assurances.
10. Identify mitigation measures for priority populations.

NOTICE OF NONDISCRIMINATION RIGHTS AND PROTECTIONS TO BENEFICIARIES

The **Central Massachusetts Metropolitan Planning Organization (CMMPO)** operate their 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, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.



WHAT IS...?

Beneficiary refers to any person or group of persons entitled to receive benefits, directly or indirectly, from any Federally assisted program

Continued Notice...

Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination based on age, sex, and disability. These protected categories are contemplated within CMMPO's Title VI Programs consistent with federal interpretation and administration.

Additionally, the CMMPO provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

The CMMPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c272 §§ 92a, 98, 98a, prohibiting 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 CMMPO complies with the Governor's Executive Order 526, section 4 requiring 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.

HOW TO SUBMIT A COMPLAINT

Individuals who feel they have been discriminated against in violation of Title VI or related Federal nondiscrimination laws, must file a complaint within 180 days of the alleged discriminatory conduct to:

Ms. Stephanie Toupin
Title VI Coordinator
Central Massachusetts Regional Planning
Commission
1 Mercantile Street, Suite 520
Worcester, MA 01608
(508) 756-7717

The Complaint Forms and Procedures are available for download on the CMRPC website:
<https://cmrpc.org/about-us/title-vi-policy/>

The documents are available in MS Word, PDF, and HTML formats and in the following languages: Spanish, Portuguese, Chinese, Vietnamese, Swahili. The CMMPO can provide translations in other languages by request.

Printed copies are available at the CMRPC main office located at:

1 Mercantile Street, Suite 520
Worcester, MA 01608



Continued Complaints...

To file a complaint alleging violation of the State's Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

**Massachusetts Commission Against
Discrimination (MCAD)
One Ashburton Place, 6th floor
Boston, MA 02109
(617) 994-6000
TTY: (617) 994-6196**

Questions, complaints, or requests for additional information regarding ADA and Section 504 may be forwarded to:

**Ms. Stephanie Toupin
Title Vi Coordinator
Central Massachusetts Regional
Planning Commission
1 Mercantile Street, Suite 520
Worcester, MA 01608
(508) 756-7717
stoupin@cmrpc.org**

ENVIRONMENTAL JUSTICE

Environmental Justice (EJ) is defined as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

WHAT IS...?

Fair Treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

WHAT IS...?

Meaningful Involvement means that people have an opportunity to participate in decisions about activities that may affect their environment and/or health. Their contribution can influence the agency's decisions, policies and processes.

CMMPO'S TRANSPORTATION JUSTICE GOAL

Ensure that all people in the central Massachusetts region receive comparable benefits from, and are not disproportionately burdened by, CMMPO investments, regardless of race, color, national origin, age, income, ability, sex or gender.

The CMMPO's objectives help staff develop concrete work activities to advance the CMMPO's transportation justice goals:

- Prioritize CMMPO investments that benefit priority populations.
- Minimize potential harmful environmental, health, and safety effects of CMMPO-funded projects for all priority populations.
- Promote investments that support transportation for all ages.
- Promote investments that are accessible to all people regardless of ability.

2020 - 2029 CMMPO Transportation Improvement Program (TIP) Equity Analysis

Regional Environmental Justice "Plus"

- Population over 65 (Percent of population greater than the MPO 75th percentile: 21%)
- Low Income (< MPO 25th Percentile of Median Household Income: ~\$60,921)
- Minority (> 75th MPO Regional Percent Minority: >41%)
- LEP (> MPO 75th Percentile: 8%)
- Zero Vehicle HH (> MPO 75th Percentile: 14%)
- Disability HH (> MPO 75th Percentile: 32%)

Legend

Project Type

- Bridge
- Intersection
- Other
- Roadway Segment
- Bikeways

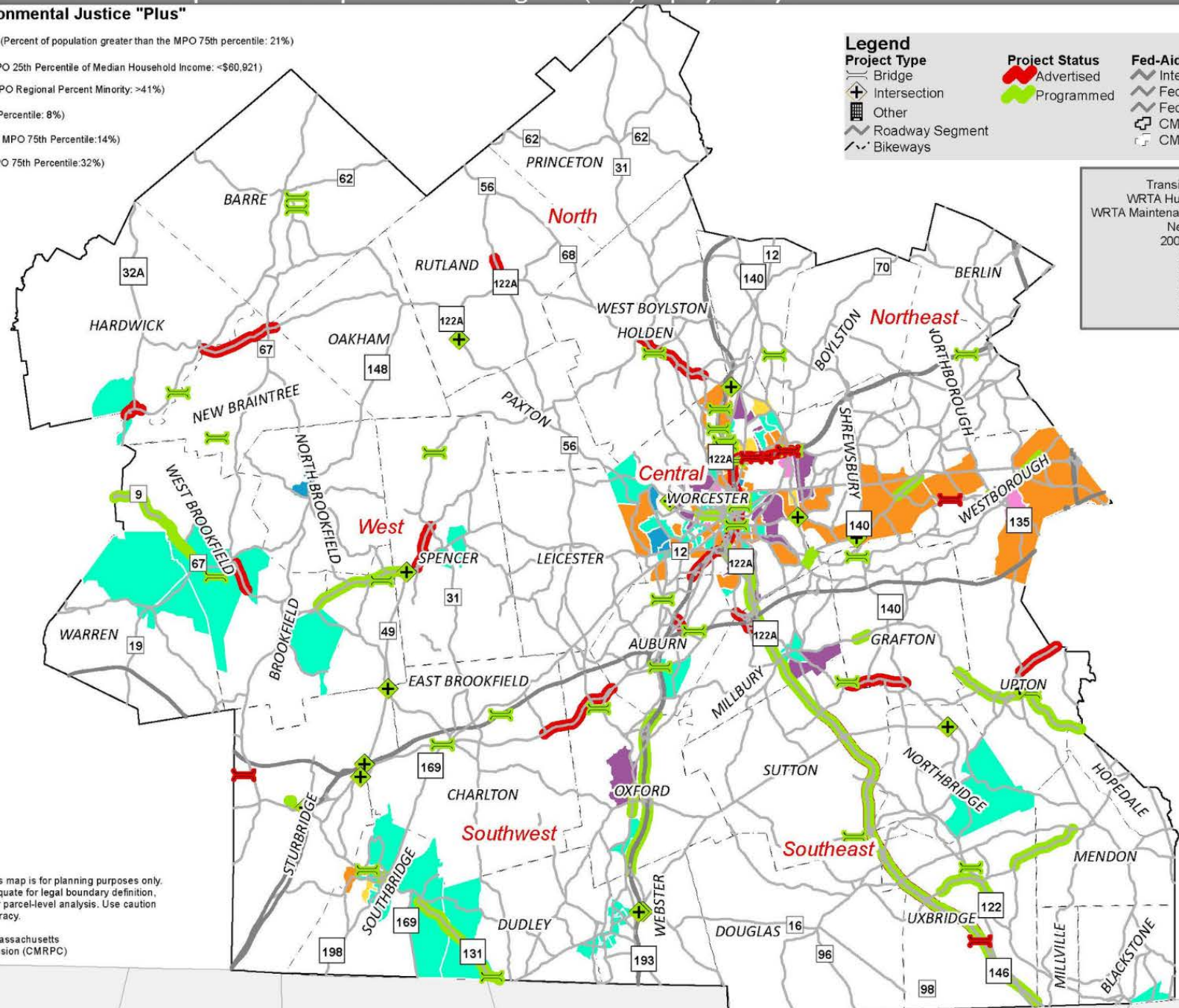
Project Status

- Advertised
- Programmed

Fed-Aid Eligible Road

- Interstate Highway
- Fed-Aid Eligible Collector
- Fed-Aid Eligible Arterial
- CMMPO Boundary
- CMRPCTowns

Transit TIP Projects
 WRTA Hub Complex: 2012
 WRTA Maintenance & Operations: 2014
 New Buses:
 2008-2024: 79
 2025: 6
 2026: 7
 2027: 3
 2028: 0
 2029: 0



Information depicted on this map is for planning purposes only. This information is not adequate for legal boundary definition, regulatory interpretation, or parcel-level analysis. Use caution interpreting positional accuracy.

Produced by the Central Massachusetts Regional Planning Commission (CMRPC)
 1 Mercantile St. Ste. 520
 Worcester, MA 01608
<http://www.cmrpc.org/gis>

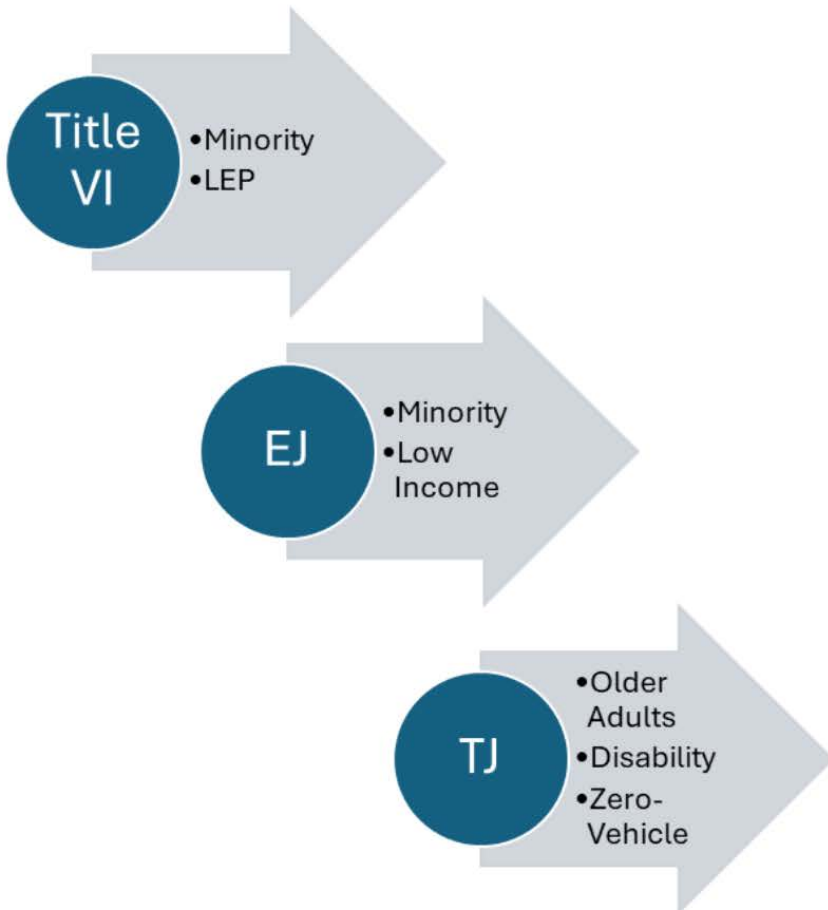
Source: Data provided by the Central Massachusetts Regional Planning Commission (CMRPC), Mass DOT and the Executive Office of Environmental Affairs/MassGIS (EOEA/MassGIS).



REJ+ PRIORITY POPULATIONS

Consistent with MassDOT's Beyond Mobility 2050 Transportation Plan, the CMMPO adopted the Regional Environmental Justice "Plus" Communities (REJ+) thresholds for the Central Massachusetts region. The REJ+ refers to environmental justice populations that are most impacted by transportation changes.

CMMPO'S REJ+ POPULATIONS



REJ+ THRESHOLDS

A U.S. Census Block Group is identified as an REJ+ Community if the following are true:

- At least one of three EJ criteria must be true:
 - Annual median household income less or equal than the CMMPO 25th percentile
 - Percent of minority population is greater or equal than the CMMPO 75th percentile
 - Percent of households with limited English proficiency is greater or equal than the MPO 75th percentile

At least one of the following three transportation criteria must be true:

- Percent of households with zero vehicles is greater or equal than the CMMPO 75th percentile
- Percent of households with individuals with disabilities is greater or equal than the CMMPO 75th percentile
- Percent of older adults (65 years of age or more) is greater or equal than the CMMPO 75th percentile

These thresholds are used by the CMMPO in a vast array of ways, including determining suitable outreach and engagement methods, measuring impacts of transportation projects, determining investments are equitable, among many other applications to advance the CMMPO's transportation equity goals.

LONG-RANGE TRANSPORTATION PLAN

The Long-Range Transportation is a federally required document with the purpose of identifying the multi-modal/intermodal transportation needs of the region, the project investments and initiatives to meet the identified needs, as well as the funding anticipated to be available to address those needs over the next 20-year planning period. The CMMPO must update their LRTP every four years.

The current LRTP, 2050 Connections, includes a Needs Assessment. The assessment is a comprehensive process through which staff identify transportation needs in the Central Massachusetts region.

Also, an equity analysis is performed to evaluate the impacts of major infrastructure projects. The analysis relies on a three-pronged approach. This approach includes elements of geographic equity, locational analysis, and a “benefits and burdens” analysis.



COORDINATED TRANSPORTATION PLAN

Transportation needs are also collected through the development of the CMMPO's Coordinated Public Transit Human Services Transportation Plan (Coordinated Plan). The Coordinated Plan is completed every four years, following the same timeline as the LRTP.

One of the main functions of the plan is to identify unmet transportation needs for older adults and individuals with disabilities in the Central Massachusetts region through extensive public engagement and to develop strategies and actions to address those needs.

Engagement is primarily conducted through focus groups and interviews with individuals who work closely with older adults and individuals with disabilities, such as councils on aging and other organizations that provide direct services to these populations. The CMMPO also has staff who collaborate, work and actively engage with disability advocacy groups to better understand their needs.

TRANSPORTATION IMPROVEMENT PROGRAM (TIP)

The Transportation Improvement Program (TIP) is a five-year programming document that lists all the transportation infrastructure projects of the regional transportation system. The TIP is developed annually and is subject to amendment and adjustment as needed. Each program year of the TIP coincides with the Federal Fiscal Year, October 1 through September 30.

As part of the TIP development, the CMMPO staff analyze regionally funded projects to assess funding distribution among REJ+ populations, to understand the impact of transportation investments. The analysis includes a map showing the distribution of the transportation projects relative to the distribution of minority and low-income populations in the Central Massachusetts region.

UNIFIED PLANNING WORK PROGRAM (UPWP)

The CMMPO's Unified Work Planning Program or UPWP for short is a document that includes the annual work program the CMMPO staff will perform during the next Federal Fiscal Year. As part of the UPWP development, every year, staff conduct a geographical assessment of the distribution of CMMPO-funded UPWP studies and technical support activities. The assessment is presented for each of the 40 communities included in the CMMPO region.

The assessment provides a comprehensive view of the equitable distribution of UPWP-funded studies, ensuring that diverse communities, especially those with significant REJ+ populations, are being considered and supported in the CMMPO's planning efforts. This approach allows the CMMPO to identify gaps and make informed decisions to improve transportation equity across the Central Massachusetts region.

PUBLIC INVOLVEMENT

The CMMPO's Public Participation Plan (PPP) presents the CMMPO approach to meaningful and equitable public engagement, which is a key pillar to the CMMPO's planning and decision-making. The CMMPO's approach to engagement is centered on the development of strong relationships with members of the community, particularly groups and organizations representing populations who have historically been underrepresented and underserved in the planning process.



WANT TO PARTICIPATE?

As a member of the **CMMPO Advisory Committee** you can actively participate in the development of the TIP, make recommendations for consideration to the CMMPO, and advocate for projects that address the needs of priority populations.

LANGUAGE ASSISTANCE

CENTRAL MASSACHUSETTS METROPOLITAN PLANNING ORGANIZATION



Language Assistance Program & Limited English Proficiency (LAP/LEP) and Implementation Plan

3/30/2015
REVISED 12/30/2023

Prepared by the transportation staff of the



1 Mercantile Street - Unum Building, Worcester MA 01604-4016

The CMMPO is continuously evaluating language needs in the region and balance these with available resources. The CMMPO's Language Assistance Plan (LAP) presents the strategies and processes that the CMMPO uses to guarantee language access. The CMMPO also relies on community partners for the languages spoken in various communities.

TOP 5 LANGUAGES

SPANISH
CHINESE
SWAHILI
VIETNAMESE **PORTUGUESE**

These languages account for about three-quarters of all non-English language speakers in the region.

SPECIFIC PROHIBITED DISCRIMINATORY ACTIONS

A recipient under any program may not on the grounds of race, color, or national origin:

- a) Deny a person any service, financial aid, or other benefit.
- b) Provide any service, financial aid, or other benefit to a person which is different, or is provided in a different manner, from that provided to others.
- c) Subject a person to segregation or separate treatment in any matter.
- d) Restrict a person in any way in the enjoyment of any advantage or privilege enjoyed by others.
- e) Treat a person differently from others in determining whether he or she satisfies any admission, enrollment, quota, eligibility, membership, or other requirement or condition which persons must meet in order to be provided any service, financial aid, or other benefit.
- f) Deny a person an opportunity to participate in the program through the provision of services or otherwise afford him an opportunity to do so which is different from that afforded to others.

Continued...

g) Deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.

h) Use criteria or methods of administration while determining the types of services, financial aid, or other benefits, that could have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.

Other considerations:

In determining the project site or location of facilities, a recipient may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination on the grounds of race, color, or national origin.

FOR MORE INFORMATION:

Visit:

www.cmrpc.org/transportation/titlevi

or scan the QR code below



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Email: TitleVICoordinator@CMRPC.org

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Worcester, MA 01608