

Summary of Changes to the MBTA's Disparate Impact and Disproportionate Policy ("DI/DB Policy") and Public Engagement Plan ("PEP")

The MBTA is seeking public comment on proposed changes to our Disparate Impact and Disproportionate Policy ("DI/DB Policy") and Public Engagement Plan ("PEP"). These policies are a part of the MBTA's compliance with **Title VI of the Civil Rights Act of 1964**, which prohibits the MBTA from discriminating on the basis of race, color, or national origin, including limited English proficiency.

What is the DI/DB Policy?

When the MBTA proposes fare changes or significant service changes, the federal government requires the MBTA to conduct an equity analysis. The level of service changes that would require an analysis, and how we will conduct the analysis and engage the public about it are a part of this policy. The policy details how we measure whether proposed changes will have an unfair effect on minority and/or low-income riders. The DI/DB Policy:

- Defines "major service change" to identify when an equity analysis is required and says that an analysis is required for all proposed fare changes.
- Defines "adverse effects" to identify how we will measure the impacts of a major service change on minority and low-income riders.

How does the MBTA apply the DI/DB Policy?

- For each equity analysis, we ask:
 - a. Service Equity Analysis: Will minority and/or low-income riders experience more of an impact from the proposed major service change?
 - b. Fare Equity Analysis: Will minority and/or low-income riders experience more of an impact from the proposed fare change?
- If the change will have more of an impact on minority riders, this is called a disparate impact finding and the MBTA must explain the need for the change and show that no there are no effective alternatives.
- If the change places more of a burden on low-income riders, this is called a disproportionate burden finding and the MBTA must consider mitigation measures and any less discriminatory alternatives that may be available before moving ahead with the proposed change.
- The MBTA will engage with the public throughout the process to ensure that the benefits of the proposed changes outweigh any potential downsides.

What Changes are Proposed to the DI/DB Policy?

1. Rename the document "Service and Fare Change Equity Policy" to more clearly state the policy's purpose and enhance understanding.
2. Redefine "major service change" to account for network-wide effects and to clarify when service changes and disruptions do not require a service equity analysis.

3. Improve service equity analysis methodology so that we may consider more riders with low-income and have more reliable results.
4. State the circumstances that require a fare equity analysis and which fare changes are exempt.
5. Describe the public engagement and the Board approval process required for any major service change or fare change.

What is the Public Engagement Plan (PEP)?

The PEP details what kinds of processes, projects, and decisions the public may influence through their engagement and our responsibility in that process. The PEP is broadly designed to help shape an inclusive relationship between the MBTA and our diverse rider base.

You can access a copy of the draft PEP at [insert weblink]. Translated versions are available in [list languages], and additional translations can be provided upon request.

What Changes are Proposed to the Public Engagement Plan?

The key revisions to the PEP are as follows:

1. Updated “Background on the MBTA” section with current information on the MBTA’s governing Board of Directors.
2. Clarified guiding principles in the “Guiding Principles for Public Engagement” section, such as specifying “equity” in our engagement strategies to reach diverse members of the community.
3. Added “Community Meetings” as a common type of engagement in the “Community Events and Engagement” section.
4. Expanded “Virtual Public Engagement” section with details on the MBTA’s increased use of virtual public engagement strategies following the COVID-19 pandemic.
5. Expanded section on “Accessibility and Public Engagement” with updated information on accessible public meetings.
6. Added clearer language for collecting and considering public comments prior to a fare increase (see section on “Public Engagement Regarding Fare Changes”) or major service reductions (see section on “Public Engagement Regarding Service Planning & Service Changes”).

How can I submit Feedback on the Proposed Changes to the DI/DB Policy and the PEP?

The public comment period is open through **Friday, April 14**. Members of the public are encouraged to submit comments on the changes outlined above. Comments will be accepted during our public events, and by postal mail, phone, and email.

Public Meetings

We're hosting public meetings in March to share the proposed changes with you, answer your questions, and listen to your feedback.

Tuesday, March 21, 2023 at 6pm

Location: State Transportation Building, 10 Park Plaza, Boston, MA 02116 (hybrid via Zoom)

Chinese and Spanish interpreters will be provided for this meeting.

Wednesday, March 22, 2023 at 6pm

Location: QARI, 275 Hancock St, Suite 202, Quincy, MA 02171

Chinese interpreter will be provided for this meeting.

Tuesday, March 28, 2023 at 6pm

Location: La Collaborativa, 318 Broadway, Chelsea, MA 02150

Spanish interpreter will be provided for this meeting.

Accessibility accommodations and additional language services can be provided upon request, as available.

Learn more about the changes and ways to provide feedback at [mbta.com/draftpolicies](https://www.mbta.com/draftpolicies)