



**Massachusetts Bay
Transportation Authority**

Triennial Title VI Program
Request to Approve for Submission to FTA

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Background and Purpose

- 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 for our riding public.
- Every three years, public transit providers are required to submit a Title VI Program to the Federal Transit Administration
- The Title VI Program addresses two objectives –
 1. Reflect on the prior three years of service to identify and better understand possible disparities
 2. Detail the compliance and program implementation strategies in place



The Many Touch Points of Title VI

- The triennial Title VI program is designed to directly address specific FTA compliance and reporting requirements.
- However, it is only one of many Title VI initiatives this Board regularly considers.
- Between triennial Title VI reports, the Board 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 proposals striving to minimize disparities



Triennial Title VI Program – Context and Limits

What it is:

- Three-year lookback at service that has already been provided
- Collection of equity analyses already completed and approved
- A document that is submitted to our federal partners for review as well as posted publicly on the MBTA website
- One component of MBTA eligibility to receive federal financial assistance

What it isn't:

- Not a compendium of every equity related initiative at the MBTA
- Does not consider all demographics – focuses on race, color, national origin, limited English proficiency, and low-income
- Looks forward only on limited topics, such as inclusive public engagement and language access strategies
- Potential disparity findings are an invitation to look more closely, not necessarily a conclusion that something is wrong



Highlights

- FTA’s recent triennial audit of the MBTA found no Title VI deficiencies.
- Where possible, this report reflects new 2022 passenger survey data.
- Two key policies have been updated, approved, and incorporated:
 - Service and Fare Change Equity Analysis Policy
 - Public Engagement Plan
- “How to Ride the MBTA: The Basics” flyer ready to disseminate in all languages in the service area that exceed 5% or 1,000 people.
- ODCR is implementing strategies to improve complaint processing, including hiring additional investigators, addressing any backlog of open complaints, and utilizing improved tracking and reporting methods.



Service Monitoring Results - Overview

Service Policies

- Service Policies focus on cleanliness, amenities, and communication of information:
 - Stop shelters
 - Station seating
 - Map and schedule postings
 - Trash receptacles
 - Message signs
 - Escalator operability
 - Vehicle assignment
- Of 49 indicators:
 - 47 showed NO disparate impact
 - 2 showed a potential disparate impact

Service Standards

- Service Standards focus on the time, place, crowding, and accessibility:
 - Vehicle load
 - Vehicle headway
 - On-time performance
 - Service availability
 - Span of service
 - Station accessibility
 - Service operated
- Of 38 indicators:
 - 31 showed NO disparate impact
 - 7 showed a potential disparate impact



Responding to Potential Disparities

- The indication of a potential disparity in service monitoring is regarded as an opportunity for a closer look to better understand the outcome.
 - Secondary analyses may be performed to conclusively determine if disparities exist.
- 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 Policy Disparities

Variable-Message Signs:

A one-time inspection of the operability of variable-message signs at each gated rapid transit station, surface rapid transit station, and commuter rail station that had variable-message signs.

1. Operability at Commuter Rail Stations

Upon Further Examination:

This potential disparity reflects the results of a one-time inspection where two (2) variable-message signs were nonoperational. The MBTA has confirmed that these two signs have been repaired and are operational, which addresses this potential disparity.



Potential Service Policy Disparities

Vehicle Assignment :

Compares the average age of coaches on trains run on each line to the average age of coaches on trains run systemwide.

2. Commuter Rail Vehicle Age

Upon Further Examination:

This potential disparity reflects the fact that the MBTA utilized older single-level cars on routes with lower ridership and newer bi-level cars on routes with higher ridership, for capacity reasons. The MBTA is procuring additional new bi-level cars. 22 vehicles have been delivered and are currently in pre-revenue service acceptance testing. Once accepted, the new cars will replace some of the oldest single-level car in the commuter rail fleet, addressing this disparity.



Potential Service Standard Disparities

On Time Performance:

For each route, the timepoints at which a vehicle was on time were summed for all trips on that route and divided by the total number of timepoints across all trips on that route.

1. Bus – Weekday
2. Bus – Sunday
3. Heavy and Light Rail – Saturday
4. Heavy and Light Rail – Sunday

Upon Further Examination:

For both bus and rail, a potential disparity is only indicated when looking at routes rather than factors like ridership and frequency. Instead, if you focus on people and look at on-time performance as experienced by riders, there is no disparity.

For rail, the definitions required for this analysis create a potential disparity where it may not exist. Currently, the minority ridership on a line has to exceed the systemwide average minority ridership to be defined as such. The systemwide average is 58%. Blue Line ridership is 56.2% but is this “non-minority” classification accurate?



Potential Service Standard Disparities

Service Operated:

Measures the percent of scheduled service that is actually provided on each route.

5. Bus - Saturday
6. Heavy and Light Rail – All Days
7. Commuter Rail - Saturday

Upon Further Examination:

For bus, dropped trips are disproportionately higher on certain routes because there is a tendency to drop trips on high frequency routes rather than low frequency routes in order to minimize the headway impact. The MBTA is working on multiple strategies to decrease dropped trips overall and ultimately lead to better service for our bus customers.

For rail, an analysis focused on people rather than routes shows 99.1% of scheduled trips were operated on minority lines and 96.7% of scheduled trips were operated on non-minority lines, which suggests better adherence to scheduled service for minority lines.

For commuter rail, the potential disparity reflects only a 0.1 percentage point difference (99.4% service operated vs. 99.5% service operated).



Request for Vote to Approve

- This presentation concludes with a request for Board vote to approve the 2023-2026 Title VI Program.
- With approval, the Title VI team can –
 - Submit the report to our partners at the Federal Transit Administration.
 - Disseminate the document to the public and among our stakeholders.
 - Implement updates to key initiatives, such as language access.

