

# Title VI - Voluntary Compliance Agreement

## Update

August 1, 2016



- The MBTA's Office of Diversity and Civil Rights is leading an effort to improve the Authority's 2014 Title VI Triennial Report, under a Voluntary Compliance Agreement (VCA) with FTA.
- Key focus areas include:
  - Revising equity analysis policy standards, including public participation
  - Updating the T's ridership survey data.
  - Language access expansion

- **May 9, 2016**: VCA work plan submitted to FTA.
- **June 30, 2016**: Submitted a demographic profile and passenger survey schedule to achieve statistically significant sampling across modes, lines and stations by March 2017.
- **August, 2016**: Submission of plan for a revised Disparate Impact/Disproportionate Burden Policy (DI/DB Policy) framework by November 2017. Completion of language access tasks, including timeframe for action.

## Title VI Working Group – Directed by Secretary, AGM and COO to:

- Strategically respond to FTA Title VI obligations (audits, monitoring and reporting).
- Lead implementation of the MBTA Title VI Program, including risk assessments, program development, public participation, training, complaint handling and language access.
- Establish and engage external Equity Advisory Group on matters of equity across MBTA.

The MBTA will restate its service and fare change equity analysis protocols for the Authority's DI/DB Policy, which defines key analytical terms and thresholds.

- **Policy Purpose:** Evaluate “Major” Service Changes and all Fare Changes, to identify potential risks of disproportionate impacts and take proactive measures where appropriate.
- **Policy Components:** Major service change policy definitions, and disparate impact and disproportionate burden thresholds.

- **Public Involvement:** The MBTA will conduct a public process to develop an equity analysis policy that includes the support of an Equity Advisory Committee, established in consultation with the FMCB and interested stakeholders, and input from the broader community.
- **Board Approval:** FMCB will review and approve the draft DI/DB Policy.