

Brockton Area Transit Authority



2020 Title VI Report & LEP Plan

Old Colony Planning Council
70 School St. Brockton MA 02301

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Introduction

The Brockton Area Transit Authority (BAT) hereby states its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related federal and state 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, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance. Massachusetts law also prohibits discrimination based on race, color, religious creed, national origin, sex, gender identity, sexual orientation, genetic information, pregnancy or a condition related to said pregnancy including, ancestry or status as a veteran, and BAT assures compliance with these laws and related federal and state civil rights laws prohibiting discrimination based on aforementioned categories.

The BAT 2020 Title VI Report has been prepared by the Old Colony Planning Council (OCPC) in response to BAT request for a Title VI compliance analysis. Title VI analyses and reporting is required by of the Federal Transit Administration (FTA) for civil rights performance monitoring at a minimum of every 3 years. Transportation providers who are recipients of Federal financial assistance from FTA are required to monitor and evaluate their transit services to ensure compliance with Title VI of the Civil Rights Act of 1964.

The Title VI of the Civil Rights Act of 1964 states the following:

“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 subjected to discrimination under any program or activity receiving Federal financial assistance.”

The objective of this report is to provide data, analysis, and other information as outlined in the Circular 4702.1B *“Title VI Requirements and Guidelines for Federal Transit Administration Recipients”* and incorporates Executive Order 13166 Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons. The objectives of FTA’s Title VI Program, as set forth in FTA Circular 4702.1B are to ensure that the following are provided without regard to race, color, or nation origin:

- To ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner
- To promote full and fair participation in public transportation decision-making without regard to race, color, or nation origin
- To ensure meaningful access to transit related programs and activities by persons with limited English proficiency

This report focuses on whether the transit service and related benefits are made available and are equitably distributed without regard to race, color, and national origin. Data analyzed for this

report concerning high and low minority populations, low-income populations, and those with limited English proficiency comes from U.S. Census data. Fleet inventories and various transit amenities information is provided by BAT.

The report also includes information on the transportation network. Most bus routes begin at BAT's Intermodal Transportation Centre, the hub of regularly scheduled bus service for Brockton and surrounding communities.

Brockton Area Transit Authority (BAT)

The Brockton Area Transit Authority (BAT) was established in 1974 and its mission statement is: "To proudly serve and be recognized as an innovative regional transit authority by providing safe, reliable and efficient service to our customers, clients and communities while achieving maximum effectiveness in complementing other forms of transportation in order to promote the general, economic, and social well-being of the area and the Commonwealth" (MGL ch.161b)."

In fulfilling this mission, the Brockton Area Transit Authority's objectives will be to its:

- ***Customers and Clients:*** responsive, respectful, friendly, safe, accessible, affordable, and dependable.
- ***Community:*** a concerned and responsible entity that supports community activities through both organizational and personal involvement.
- ***Employees:*** an employer that provides a working environment that recognizes and rewards employee contributions and initiatives; opportunities for personal growth and career advancement; and encouragement for effective and open communication and employee involvement.
- ***Operators:*** a provider of resources to support levels and quality of service determined by the authority to be reasonable, necessary, and consistent with contractual and regulatory obligations.
- ***Regulators and Funding Sources:*** a well-run, fiscally responsible authority that operates with prudent business policies and practices.

Importantly, BAT's fixed route service connects neighboring communities and the Central Business District in Boston, as well as industrial parks, colleges, medical facilities, shopping centers, and area commuter rail service. Service is offered seven days a week. Weekday service to the MBTA's Ashmont Station begins at 4:50 a.m. and ends at 12:25 a.m. Weekday service in the City of Brockton and neighboring communities begins at 6:00 a.m. and ends at 9:00 p.m. with reduced service on Saturdays until 9 p.m. and shorter span of service on Sunday.

The Brockton Area Transit Authority's service operates out of the Intermodal Transportation Centre (Intermodal Centre) that opened in 1999. The Intermodal Centre, adjacent to the MBTA Brockton Commuter Rail Station, serves as the transit hub for the South Shore and Greater

Brockton area and offers ease of access to all passengers, while bringing together many modes of transportation around a modern and convenient facility. The Centre includes a waiting area, dispatch and information center, vending machines, and bicycle and automobile commuter parking. BAT has a distinctive coalition with the local business community, and BAT's innovative transportation solutions continue to contribute positively to the service area's economy.

The BAT Intermodal Centre was recently upgraded. The Customer Service Center within the Intermodal Centre was renovated and enlarged in 2018 to better service the members of the riding public and in particular those passengers with mobility challenges. These improvements have made it even more customer facing with a new customer service counter which allows the multilingual navigator to provide trip guidance and to take photos for passenger I.D. purposes.

In addition to the renovation and upgrading of the BAT Customer Service Centre, upgrades of BAT passenger facilities and administration offices were made. Older less efficient lighting was replaced with energy efficient LED lighting and lighting fixtures at the BAT Intermodal Centre and administrative offices. Additional bicycle racks and vending machines were added to enhance the passenger experience while utilizing BAT services.

Customer Service Office

BAT participates in the MBTA's stored value card fare collection system, the Charlie Card, and all BAT's fixed route buses have fare boxes capable of utilizing the card. Charlie Card users pay a reduced fare. Stored value on a Charlie Card may be used to pay fares and to store one day, seven day, and 31-day passes. Charlie Card Ticket Vending Machines (TVM) are available at the BAT Centre. These TVMs may be used to purchase, add value to, and even store a 7-day or 31-day passes to a Charlie Card. Portuguese and (Haitian) French Creole languages were added to the TVMs as a result of a recommendation made in a past Title VI report assessments due to the large Haitian and Cape Verdean populations in BAT's service area. BAT recently added a student pass to their fare structure. This new student pass is available to high school students in the communities of Avon, Brockton, and Stoughton. BAT's students pass makes high school students eligible for half prices bus fares and monthly passes.

The two-story parking garage at the Intermodal Centre provides parking for 267 vehicles. The parking garage provides park and pay stations for customer convenience. The parking pass vending machines provide language transaction options in English, Spanish, Haitian French Creole and Portuguese, a recommendation outcome from BAT's 2013 Title VI and LEP documents. In addition to the parking garage, a modest office building adjacent to the Intermodal Transportation Centre houses BAT's administration offices.

Brockton Area Transit Authority strives to maintain a state of good repair through its ongoing system preservation efforts. Ninety (92) percent of the current BAT fixed route fleet is 2007 model year or newer Gillig low floor buses, while the overall fleet average age is 2018 model year. These low-floor buses make traveling for the disabled and elderly easier with no steps to climb or wheelchair lifts to access. Appendix A is a list of all the fixed route vehicles in the system.

BAT buses are approximately in the same physical condition and generally reflect the years of use. They are all operated on a rotating schedule, which precludes route discrimination based on bus condition. This also ensures that the rolling stock is circulated efficiently and wears evenly according vehicle age. Additionally, BAT fixed route buses are used for different routes for each run via a pulse system. For example, a bus used to service Route 3 (outbound then inbound) may go out as Route 4 when it returns to the Terminal. After it returns to the Intermodal Centre, it is used to serve Route 4A, and so on. This pulse system avoids the use of new equipment for only certain geographic areas, and older equipment being used for others.

Based on the 2020 Title VI findings, it is the determination of Old Colony Planning Council that Brockton Area Transit Authority demonstrates that transit service is made available and is equitably distributed for all individuals without regard to race, color, or national origin throughout the transit system.

General Reporting Requirements (Chapter III)

1. Requirement to provide Title VI Notice to the Public

Appendix B presents the most recent signed copy of Brockton Area Transit's Title VI Certification and Assurance. BAT has posted information for the public on its website (<http://www.ridebat.com/title6>) regarding the Title VI obligations and protections against discrimination afforded to the public by Title VI.

Appendix C is a copy of the BAT notification in English, Portuguese, Haitian French Creole, and Spanish, informing customers of their rights under Title VI. This notice is displayed on board buses and the BAT Centre.

2. Requirement to provide Title VI Complaint Procedures

Brockton Area Transit Authority's Title VI complaint procedure are similar to the processes as outlined by the Old Colony Metropolitan Planning Organization. A copy of BAT's Complaint Procedure is located in Appendix D and E.

3. Requirement to provide Title VI Form

Appendix E presents BAT's Title VI complaint form in English and the three other most represented LEP groups in BAT's service area.

4. Requirement to provide list of Transit Related Title VI Investigations, Complaints, and Lawsuits

Appendix F is a correspondence from Brockton Area Transit Authority's legal counsel stating that currently there are no investigations, complaints, or lawsuits against the authority.

5. Requirement to provide Public Participation Plan

Appendix H displays the Old Colony MPO's Public Participation Plan, which BAT will use in lieu of creating its own. The current Old Colony MPO's Public Participation was adopted on March 2017.

6. Requirement to provide Language Assistance Plan

Brockton Area Transit Authority uses a multi-pronged approach to provide access for LEP Persons. BAT's bus operators speak over nine different languages and can provide translation for customers when needed. In addition, BAT utilizes the planning process of the Old Colony Metropolitan Planning Organization and Joint Transportation Committee meetings to provide another avenue of access for LEP persons. BAT also has a Consumer Advisory Council that provides feedback about the transit service to the authority. BAT utilizes the Old Colony Planning Council and the methods laid out in the organization's Public Participation Plan to also help

engage the LEP population. BAT has a navigator position to assist passengers in trip planning, service announcements, and Portuguese translation. BAT utilizes the services of American Translation Partners to assist in the translation of public documents and notices.

Engaging the diverse population within BAT's service area is important. BAT is committed to providing quality services to all citizens, including those with limited English proficiency. Portuguese, Haitian French Creole, and Spanish are the most spoken languages by LEP individuals in BAT's service area.

BAT is available for any additional questions or requests for information.

7. Requirement to provide composition of Boards

By Law, the BAT Advisory Board is comprised of the chiefly elected official in the BAT service area or their designee. See Appendix O for composition of BAT's board members.

(a) Summary of Public Outreach and involvement activities

Brockton Area Transit Authority participated in numerous public outreach and involvement activities. In conjunction with the Old Colony Planning Council, BAT uses the Metropolitan Planning Organization, Joint Transportation Committee meetings, and the Regional Coordinating Council as an opportunity to update the community on BAT's activities. These meetings are open to the public and comments can be submitted at any time on the items discussed. BAT incorporates the Old Colony Public Participation Plan into its public outreach and involvement activities. Public outreach is also included in many of the Old Colony Planning Council's planning projects, such as corridor studies, transit studies and other planning documents.

(b) Copy of Agency's Plan for providing assistance for LEP persons

Brockton Area Transit has included efforts to address persons with limited English proficiency in many ways. BAT's operators collectively speak over nine languages or language-dialects, and are available to communicate information or assist customers in languages other than English, making them a valuable human resource.

Brockton Area Transit Authority publishes all public hearing notices in the local community newspaper, which is English only; on its website and websites of partner organization, and physically in the Town and City Halls of those communities in the BAT service area. All Gillig buses have signs in Spanish, English, Haitian French Creole, and Portuguese and bus schedules printed in these languages too. BAT continuously updates its bus interior information boards with materials in Portuguese, Haitian French Creole, and Spanish. The park and pay stations located in BAT's commuter parking garage provides for transactions in English, Spanish, Portuguese, and Haitian French Creole.

Brockton Area Transit Authority utilizes the LEP program that has been developed by Old Colony Planning Council. Additional methods are discussed in the Old Colony Title VI report.

(c) Copy of the Agency’s procedures for tracking and investigating Title VI complaints.

Brockton Area Transit Authority utilizes complaint procedures and tracking modeled off of the Old Colony Metropolitan Planning Organization’s procedures for tracking and investigating Title VI complaints. A copy of the complaint and tracking procedures is included in Appendix D.

(e) List of any Title VI investigations, complaints or lawsuits filed with the agency since the time of the last submission

Appendix F includes a statement from Brockton Area Transit Authority’s legal counsel noting that no investigations, complaints, or lawsuits have been filed since the last Title VI report.

(f) Agency’s notice to the public that complies with Title VI and instructions to the public on how to file a discrimination complaint.

Appendix C includes copies of the notifications that BAT posts within their vehicles and Intermodal Centre informing the public of their compliance with Title VI.

8. Requirement to provide description of efforts to ensure subrecipients are complying with Title VI

BAT does not pass on any Federal assistance onto another subrecipient, which would require BAT to describe how it monitors subrecipient(s) in their compliance with Title VI reporting.

9. Requirement to provide Title VI Equity Analysis for Transportation Facilities

Brockton Area Transit Authority (BAT) did not construction any new transportation facilities since the last submission of a Title VI Report in 2017.

As noted previously, Brockton Area Transit Authority utilizes the Old Colony Metropolitan Planning Organization and the Joint Transportation Committee as one of its many avenues for public participation. These meeting are open to the public with notifications for each meeting sent to a list of over 190 public officials, private interests, media, and local citizens. In addition, Brockton Area Transit Authority also reaches out via their Consumer Advisory Group. When appropriate, Brockton Area Transit Authority will make use of various planning products that have been produced by the Old Colony Planning Council. Visual instruments are important tools in the outreach to the Limited English Proficiency Population. An example of the use of these visual tools was demonstrated during the development of the 2016 BAT Comprehensive Regional Transportation Plan (CRTP). A public outreach presentation was hosted during the development of the 2016 CRTP at the BAT Intermodal Centre. At these public outreach presentations, both BAT and OCPC staff were present. It is noted that BAT provided both Spanish and Portuguese speaking staff member to assist with translation at the session.

10. Requirement to provide documentation of review and approval of Title VI Program

BAT's requirement to provide documentation of Title VI program review will be demonstrated through meeting minutes, resolution, or other appropriate documentation showing the appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. The review and approval documentation can be viewed in Appendix T.

11. Requirement to provide Additional Information

Additional information concerning chapter IV of the Title VI Circular is not required due to BAT not servicing a UZA of 200,000 people or operating 50 or more transit vehicles in peak revenue service. Additional information concerning chapter V of the Title VI Circular is not required, since this section of the Title VI Circular pertains to State Title VI reporting. Additional information concerning chapter VI reporting is not required of BAT, since this reporting section is a requirement of Metropolitan Transportation Planning Organizations.

Program Specific Requirements to Set System-wide Service Standards and Policies

Requirement to set system wide service standards

(1) Vehicle Load for Each Mode

Vehicle load is the ratio of the number of seats on vehicles to the number of passengers on board a given bus. BAT's load policy differs depending on the number of available seats on a given bus and vehicle type. BAT has three types of buses in revenue fixed route service: 40' high floor buses containing 40 seats, 40' low floor bus containing 38 seats, and 35' low floor buses containing 31 seats. BAT's load policy concerning 40' high floor buses is that no bus should exceed a load capacity greater than 1.25, meaning all available seats are filled and 10 people standing. The load policy concerning 40' low floor buses is that of 1.40, meaning all seats are filled and 15 people standing. The load policy concerning BAT's 28 passenger body on chassis buses is 1.25, meaning all seats are filled and 7 passengers standing. BAT's load policy for its demand response service is a ratio of 1, meaning that it will not allow passengers to stand on any demand response vehicle. The written policy can be found in Appendix I.

(2) Vehicle Headway for Each Mode

The measurement of the time interval between buses traveling in the same direction on a particular route is known in the transit industry as vehicle headway. BAT's headway policy differs depending on the particular route, time of day, and day of the week service operates. Bus headways range from 20 to 40 minute during morning peak hours, 25 to 50 minute headways in the afternoon peak hours, and 45 minutes during off-peak hours. Saturday and Sunday service headways average about a bus every 40 to 45 minutes. A more detailed description of BAT's vehicle headways can be viewed in Appendix J.

(3) On-Time performance for Each Mode

Brockton Area Transit averaged a 97% on-time performance rate for the last fiscal year. This is consistent with the BAT policy which is to maintain a 95% on time performance or higher. On-time Performance for the past five years can be viewed in Appendix J.

(4) Service Availability for Each Mode

BAT strives to have 90% of all individuals in its service area within a quarter mile walk of a bus stop. BAT's service availability policy also states that bus stops should not be spaced more than 3 city blocks apart for local bus service, and allows for passengers to flag down buses when they are not in proximity to a bus stop to board an approaching transit vehicle. BAT's demand response service, dial a bat, provides transit service for those seniors and persons with a disability that cannot use regular fixed route service. DIAL-A-BAT provides transit service to those living in the city of Brockton, with limited service in the towns of: Easton, Stoughton, Avon, Whitman, and

Abington that reside within $\frac{3}{4}$ of a mile to fixed route bus line. BAT's service availability policy can be viewed in Appendix L.

Service Policies

(1) Distribution of Transit Amenities for Each Mode

Brockton Area Transit Authority transit amenities policy states, that amenities shall be distributed base on passenger boarding at a particular stop. Those bus stops displaying high number of boardings, get bus shelters, benches, and or trash cans. Transit amenities policy can be viewed in Appendix S.

(2) Vehicle Assignment for Each Mode

Brockton Area Transit Authority's written Vehicle Assignment policy, as can be seen in Appendix T, states that buses are assigned their given route the night before service begins. 40' coaches are assigned to the most heavily ridden lines traveling streets that can accommodate the size of these vehicles, and 35' coaches assigned to lines with lower ridership or routes requiring buses to make tighter turns. In addition to buses being assigned based on ridership and operating conditions, BAT's practice of scheduling buses on a "pulse" schedule ensures no particular bus is assigned to any single geographic area and that transit vehicles are equitably distributed throughout the system. The only exception to the "pulse" scheduling BAT operates is the Mini-Maller, which does not go to the BAT Centre and operates between the Belmont West Plaza (Stop & Shop) and the Westgate Mall throughout the day. BAT buses, with the exception of the new Gillig buses are approximately in the same physical condition and operate on a rotating schedule, which precludes route discrimination based on bus condition. Appendix A presents the transit vehicle inventory. The pulse system avoids the use of new equipment utilized in certain geographic areas, and older equipment being used exclusively in others. BAT has a vehicle replacement schedule that is incorporated in the Old Colony MPO's Transportation Improvement Program (TIP). Objective transportation criteria are used to evaluate projects included in the TIP.

Conclusion

The 2020 Title VI Report provides data and analysis consistent with FTA Circular 4702.1B for public transit providers. Topic areas specifically addressed in the 2020 Title VI Report are: 1.) Limited English Proficiency Plan; 2.) Composition of Advisory Board and Committees members, 3.) System wide service standards and policies. The report is presented sequentially with the outline of FTA Circular 4702.1B and includes supplemental data within the Appendices.

Based on the 2020 Title VI findings, it is the determination of Old Colony Planning Council that Brockton Area Transit Authority demonstrates that transit service is made available and is equitably distributed for all individuals without regard to race, color, or national origin throughout the BAT fixed route system.

APPENDIX

Appendix A: Transit Vehicles

FIXED ROUTE VEHICLE LIST

VEHICLE #	YEAR	MAKE	SEATING	Length
0701	2007	GILLIG	38	40
0702	2007	GILLIG	38	40
0703	2007	GILLIG	38	40
0704	2007	GILLIG	38	40
0705	2007	GILLIG	38	40
0706	2007	GILLIG	38	40
1001	2010	GILLIG	38	40
1002	2010	GILLIG	38	40
1003	2010	GILLIG	38	40
1004	2010	GILLIG	32	35
1005	2010	GILLIG	32	35
1006	2010	GILLIG	32	35
1007	2010	GILLIG	32	35
1008	2010	GILLIG	32	35
1009	2010	GILLIG	38	40
1201	2012	GILLIG	38	40
1202	2012	GILLIG	38	40
1203	2012	GILLIG	38	40
1204	2012	GILLIG	38	40
1301	2013	GILLIG	38	40
1302	2013	GILLIG	38	40
1303	2013	GILLIG	32	35
1304	2013	GILLIG	32	35
1305	2013	GILLIG	32	35
1701	2017	GILLIG	31	35
1702	2017	GILLIG	31	35
1703	2017	GILLIG	31	35
1704	2017	GILLIG	31	35
1705	2017	GILLIG	37	40
1706	2017	GILLIG	37	40
1707	2017	GILLIG	37	40
1708	2017	GILLIG	37	40
1801	2018	GILLIG	31	35
1802	2018	GILLIG	31	35
1803	2018	GILLIG	31	35
1804	2018	GILLIG	31	35
1805	2018	GILLIG	31	35
1806	2018	GILLIG	31	35
1807	2018	GILLIG	31	35
1808	2018	GILLIG	31	35
1809	2018	GILLIG	31	35
1810	2018	GILLIG	37	40
1811	2018	GILLIG	37	40
1812	2018	GILLIG	37	40

DEMAND RESPONSE ROLLING STOCK STATUS REPORT

VEHICLE #	VIN	YEAR	MAKE	Model	STATUS
278	1FDPE45P49DA90991	2009	STAR	ALLST	C
280	1FDPE4FS1CDA71311	2012	STAR	ALLST	A
281	1FDPE4FS7CDA71314	2012	STAR	ALLST	A
282	1FDPE4FS7CDA71328	2012	STAR	ALLST	A
283	1FDPE4FS4CDA71299	2012	STAR	ALLST	A
284	1FDPE4FS3CDA71312	2012	STAR	ALLST	A
285	1FDPE4FS0CDA71316	2012	STAR	ALLST	A
286	1FDPE4FS8CDA71337	2012	STAR	ALLST	A
287	1FDPE4FS3DDA93103	2013	ELKHA	COACHMAN	A
288	1FDPE4FS8DDA93095	2013	ELKHA	COACHMAN	A
289	1FDPE4FS6DDA93094	2013	ELKHA	COACHMAN	A
290	1FDPE4FSXDDA93096	2013	ELKHA	COACHMAN	A
291	1FDPE4FS1DDA93102	2013	ELKHA	COACHMAN	A
292	1FDPE4FS5DDA93104	2013	ELKHA	COACHMAN	A
293	1FDPE4FS7DDA93105	2013	ELKHA	COACHMAN	A
295	1FDEE4FL4EDA88899	2014	FORD	CUTVAN	A
296	1FDEE4FLOEDA88902	2014	FORD	CUTVAN	A
297	1FDEE4FL2EDA88903	2014	STARCRAFT	ALLST	A
298	1FDEE4FL6EDA88905	2014	STARCRAFT	ALLST	A
299	1FDEE4FL8EDA88906	2014	STARCRAFT	ALL	A
300	1FDEE4FLXEDA88907	2014	STAR	ALLST	A
301	1FDEE4FL1EDA88908	2014	STAR	ALLSTAR	A
303	1FDPE4FS9GDC10980	2016	FORD	CUTVAN	A
304	1FDPE4FS0GDC10981	2016	FORD	CUTVAN	A
305	1FDPE4FS2GDC10982	2016	FORD	CUTVAN	A
306	1FDPE4FS4GDC10983	2016	FORD	CUTVAN	A
307	1FDPE4FS6GDC10984	2016	FORD	CUTVAN	A
308	1FDPE4FS8GDC10985	2016	FORD	ECONOLINE	A
309	1FDPE4FSXGDX10986	2016	FORD	ECONOLINE	A
310	1FDPE4FSXGDC50310	2016	FORD	ECONOLINE	A
311	1FDPE4FS8GDC50306	2016	FORD	ECONOLINE	A
313	1FDPE4FD3GDC50309	2016	FORD	ECONOLINE	A
314	1FDEE3FL7GDC30725	2016	FORD	ECONOLINE	A
315	1FDEE3FL9GDC30726	2016	FORD	E350	A
316	1FDEE3FL0GDC30727	2016	FORD	ECONOLINE	A
317	1FDPE4FS3HDC46262	2017	FORD	E450	A
318	1FDPE4FS3HDC46263	2017	FORD	E450	A
319	1FDPE4FS3HDC46264	2017	FORD	E450	A

Appendix B: BAT/FTA Certifications and Assurances

Certifications and Assurances

Fiscal Year 2020

FEDERAL FISCAL YEAR 2020 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Brockton Area Transit Authority

The Applicant certifies to the applicable provisions of categories 01-20. X

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category		Certification
01	Certifications and Assurances Required of Every Applicant	_____
02	Public Transportation Agency Safety Plans	_____
03	Tax Liability and Felony Convictions	_____
04	Lobbying	_____
05	Private Sector Protections	_____
06	Transit Asset Management Plan	_____
07	Rolling Stock Buy America Reviews and Bus Testing	_____
08	Urbanized Area Formula Grants Program	_____
09	Formula Grants for Rural Areas	_____
10	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	_____

Certifications and Assurances

Fiscal Year 2020

- 12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs
- 13 State of Good Repair Grants
- 14 Infrastructure Finance Programs
- 15 Alcohol and Controlled Substances Testing
- 16 Rail Safety Training and Oversight
- 17 Demand Responsive Service
- 18 Interest and Financing Costs
- 19 Construction Hiring Preferences
- 20 Cybersecurity Certification for Rail Rolling Stock and Operations

FEDERAL FISCAL YEAR 2020 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE

PAGE

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2020)

AFFIRMATION OF APPLICANT

Name of the Applicant: Brockton Area Transit Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2020, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2020.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Certifications and Assurances

Fiscal Year 2020

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature Michael J. Lambert Date: 4.13.20

Name Michael J. Lambert Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Brockton Area Transit Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature Charles C. Stevenson, Esq. Date: 3/10/2020

Name Charles C. Stevenson Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

Appendix C: BAT Notice to Public about Title VI

Notification of the Public Rights Under Title VI

BROCKTON AREA TRANSIT AUTHORITY

The Brockton Area Transit Authority (BAT) operates its programs and services without regard to race, color, and national origin in accordance with Title VI and the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with BAT.

For more information on BAT's civil rights program and the procedures to file a complaint, contact 508-588-2240, ext. 236, (TTY 508-856-0009); email lsacchetti@ridebat.com; or visit our administrative office at 155 Court St., Brockton, MA 02302. For more information, visit www.ridebat.com.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 508-588-2240.

Autoridad de Tránsito del Área de Brockton Notificación de los Derechos Públicos Bajo el Título VI

La Autoridad de Tránsito del Área de Brockton (BAT) opera sus programas y servicios, sin distinción de raza, color y origen de nacionalidad, en conformidad con el Título VI y la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante BAT.

Para obtener información sobre el programa de derechos civiles BAT y los procedimientos para presentar una queja, comuníquese al (508) 588-2240 ext. 236 (TTY 508-856-0009), correo electrónico: lsacchetti@ridebat.com, o visite nuestra oficina administrativa en el 155 Court Street., Brockton, MA 02302. Para obtener más información visite www.ridebat.com.

Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si necesita información es en otro idioma, llame al (508) 588-2240.

Notificação dos direitos públicos no Título VI

BROCKTON AREA Autoridade de Trânsito

O Brockton Area Transit Authority (BAT) opera seus programas e serviços, sem distinção de raça, cor e origem nacional, em conformidade com o Título VI e da Lei dos Direitos Civis. Qualquer pessoa que ela acredita ou ele tem sido prejudicada por qualquer prática discriminatória ilegal ao abrigo do Título VI pode apresentar uma queixa junto BAT.

Para mais informações sobre o programa de direitos civis da BAT e os procedimentos para registrar uma reclamação, entre em contato 508-588-2240, ext. 236, (TTY 508-856-0009); lsacchetti@ridebat.com e-mail, ou visite o nosso escritório administrativo em 155 Tribunal St., Brockton, MA 02302. Para mais informações, visite www.ridebat.com.

A denúncia pode registrar uma reclamação diretamente com a Administração Federal de Trânsito mediante a apresentação de uma queixa junto do Escritório de Direitos Civis, Attention: Título VI Coordenador do Programa, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590. .

Se a informação é necessária em outro idioma, contate 508-588-2240.

Avi sou Dwa Piblik Anba Tit VI
BROCKTON AREA TRANSPÒ OTORITE

Brockton Zòn Broward Otorite a (BAT) opere pwogram li yo ak sèvis san yo pa konsidere ras, koulè, ak orijin nasyonal an akò ak Tit VI ak Sivil Lwa sou Dwa Moun. Nenpòt moun ki mete konfyans yo li oswa li te sibi yon domaj pa nenpòt pratik ilegal diskriminasyon dapre Lwa Tit VI ka depoze yon plent ak baton.

Pou plis enfòmasyon sou sivil pwogram BAT nan dwa ak pwosedi ki pote yon plent, kontakte 508-588-2240, ext. 236, (TTY 508-856-0009); email lsacchetti@ridebat.com; oswa ale nan nou an administratif biwo a 155 Court St., Brockton, MA 02302. Pou plis enfòmasyon, vizite www.ridebat.com.

Yon moun ki pote plent ka depoze yon plent dirèkteman ak Administrasyon Federal Transit pa depoze yon plent nan Biwo Dwa Sivil, atansyon: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si enfòmasyon ki nesèsè nan yon lòt lang, kontakte 508-588-2240.

Appendix D: BAT Title VI Complaint Procedure-Long Notice

12/12

Brockton Area Transit Authority Title VI Complaint Procedure

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Two Executive Orders and related statutes further define populations that are protected under the umbrella of Title VI. Executive Order 12898 concerns environmental justice for minority and low-income populations. Executive Order 13166 concerns providing equal access to services and benefits for individuals with limited English proficiency (LEP). The rights of women, the elderly, and people with disabilities are protected under similar statutes. Massachusetts General Law extends these protections to prevent discrimination on the basis of religion, military service, ancestry, sexual orientation, and gender identity or expression.

To comply with 49 CFR Section 21.9(b), the Brockton Area Transit Authority (BAT) maintains the following procedure for receiving, investigating, addressing, and tracking Title VI complaints.

1.0 Submittal of Complaints

Any person who believes that the Brockton Area Transit Authority has subjected him or her or any specific class of persons to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, and programming federal funds may submit a written complaint. Complaints may be submitted for discrimination on the basis of race, color, national origin, language, gender, age, disability, income, religion, military service, ancestry, sexual orientation, or gender identity or expression. Any such complaint shall be submitted no later than 180 days after the date the person believes the discrimination occurred. For information or to file a complaint under Title VI or the state Public Accommodations law, the contacts are as follows:

**Brockton Area Transit Authority
Title VI Coordinator
155 Court Street
Brockton, MA 02302
(508) 588-2240**

**MCAD
One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: (617) 994-6196**

Complaints shall be in writing and shall set forth as completely as possible the relevant facts and circumstances surrounding the alleged discrimination. The following information shall be included:

- Name, address, and phone number of the complainant.
- A statement of the complainant, including:
- The basis of the alleged discrimination (race, color, national origin, or language).
- A detailed description of the alleged discriminatory act(s).

- What in the nature of the alleged act(s) led the complainant to feel that discrimination was involved.
- The date(s) on which the alleged discriminatory act(s) occurred.
- The name(s) of individual(s) alleged to have participated in the act(s).
- The name(s) of all other agencies or organizations where the complaint is also being filed (if applicable).
- The signature of the complainant and date submitted.

If a complainant is unable or incapable of providing a written statement and has no designee to do so, a verbal complaint of discrimination may be made to the BAT Title VI Coordinator. Verbal complaints may be submitted (either in person, by telephone at (508) 588-2240, or via a recording) to the Title VI Coordinator. The Title VI Coordinator will convert the verbal allegations to writing and provide the written document for confirmation, revision, and a signature before processing. Where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint.

2.0 Review of Complaint

Within twenty one (21) days, BAT shall confirm receipt of the complaint and inform the Complainant of the investigation process.

Upon receipt of the complaint, the BAT Title VI Coordinator and other BAT staff shall review it. Within sixty (60) days, should the complaint have merit, BAT shall commence an investigation of the allegation(s). The investigation may include the gathering of additional information from the complainant and/or the alleged discriminating party (ies). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 has occurred. Upon completion of the investigation, the Title VI Coordinator shall report to the BAT Administrator. The report may include recommendations for possible action to address the complaint. Subsequently, BAT will render a recommendation for action in a report of findings or resolution.

Recommendations may include:

- Forwarding the complaint to a responsible implementing agency.
- Identifying remedial actions that are available to offer redress.
- Identifying possible improvements to the BAT processes related to Title VI and environmental justice.

3.0 Appeals

The complainant may appeal the Chair's response to the complaint. Appeals must be in writing to either of the following no later than 30 days after the date of the written response:

**MassDOT
 Director of Civil Rights
 10 Park Plaza, Suite 4160
 Boston, MA 02116**

**Department Office of Civil Rights
 U.S. Department of Transportation
 1200 New Jersey Avenue
 Washington D.C. 20590**

In the case where a complainant is unable or incapable of providing a written appeal and has no designee to do so, a verbal appeal to a complaint of discrimination decision may be made through the Title VI Coordinator. Verbal appeals may be submitted (either in person, by telephone at (508) 588-2240, or via a recording) to the Title VI Coordinator. The Title VI Coordinator will convert the verbal appeal to writing and provide the complainant with the written document for confirmation, revision, and a signature before processing. In cases where the Complainant will be assisted in converting an oral appeal into a written appeal, the Complainant is required to sign the written appeal.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel. These procedures are part of an administrative process that does not include punitive damages or compensatory remuneration for the complainant.

BAT will forward complaints and responses to the complaints to the Massachusetts Department of Transportation's Office of Civil Rights.

4.0 Resolution

If a probable cause of a discriminatory practice based on race, color, or national origin is found to exist, BAT shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Plan shall include a list of all corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency will implement the accepted corrective action in the manner discussed in the plan.

Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA C4702.1B.

5.0 Complaint Tracking

BAT will maintain a log of Title VI complaints, lawsuits, and investigations alleging discrimination on the basis of race, color, or national origin. The log shall include filing date(s), allegation summaries, status of the investigation, lawsuit, or complaint, and actions taken by BAT. This log will be available for public review at the offices of the Brockton Area Transit Authority, 155 Court St., Brockton, MA, during business hours.

November 1, 2012

Brockton Area Transit Authority: Tit VI Pwosedì pou Pote Plent

Tit VI nan Lwa sou Dwa Sivil entèdi diskriminasyon sou baz ras, koulè, oswa orijin nasyonal nan pwogram ak aktivite k ap resevwa asistans finansye federal. De Dekrè Egzekitif ak lòd ki gen rapò ak plis defini popilasyon ke yo pwoteje dapre parapli a nan Tit VI. Dekrè Egzekitif 12898 enkyetid jistis anviwonmantal pou minorite ak ti-revni ki popilasyon. Dekrè Egzekitif 13166 enkyetid bay aksè a sèvis yo ak benefis yo pou moun ki gen konpetans limite nan angle (LEP). Dwa fanm, granmoun aje yo, ak moun ki gen andikap yo pwoteje anba lòd menm jan an. Lwa jeneral Massachusetts fin sa yo pwoteksyon yo anpeche diskriminasyon sou baz la nan relijyon, sèvis militè, zansèt, oryantasyon seksyèl, e idantite seksyèl oswa ekspresyon.

Konfòme l avèk 49 CFR seksyon 21.9 (b), Brockton Zòn Broward Otorite a (BAT) kenbe pwosedì a sa yo pou resevwa, mennen ankèt sou, adrese, epi swiv Tit VI pote plent.

1.0 Submittal nan Plent

Nenpòt moun ki kwè ke te Zòn Brockton Transit Authority sibi l 'oswa li oswa nenpòt klas espesifik nan moun ki diskriminasyon ki se entèdi pa Tit VI nan Lwa sou Dwa Sivil 1964, amannman ki fèt li yo ak tout regleman ki gen rapò ak, ak pwogramasyon fon federal ka soumèt yon ekri plent. Plent ka soumèt pou diskriminasyon sou baz ras, koulè, orijin nasyonal, lang, sèks, laj, enfimite, revni, relijyon, sèvis militè, zansèt, oryantasyon seksyèl, oswa idantite seksyèl oswa ekspresyon. Nenpòt plent sa yo dwe soumèt pa pita pase 180 jou apre dat moun nan kwè diskriminasyon an te fèt. Pou plis enfòmasyon oswa pote yon plent anba Tit VI oswa eta Montre granmoun ki lalwa Moyiz la Akomodasyon, kontak yo se jan sa a:

Brockton Area Transit Authority
Title VI Coordinator
155 Court Street
Brockton, MA 02302
(508) 588-2240

MCAD
One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: (617) 994-6196

Plent va parèt nan ekri e yo tabli kòm konplètman ke posib fè sa yo ki enpòtan ak sikonstans ki antoure diskriminasyon sipoze a. Va Enfòmasyon sa yo dwe enkli:

- Non, adrès, ak nimewo telefòn nan ki pote plent lan.
- Yon deklarasyon sou ki pote plent lan, ki gen ladan:
 - Baz la nan diskriminasyon sipoze a (ras, koulè, orijin nasyonal, oubyen lang).
 - Yon deskripsyon detaye sou swadizan aksyon an diskriminatwa.
 - Ki sa ki nan nati a nan swadizan zak la (yo) ki te dirije ki pote plent lan yo santi yo te ke diskriminasyon ki enplike.
 - Dat la sou ki swadizan zak diskriminasyon an te fèt.
 - Non a nan moun akize ki te patisipe nan zak la.

- Non a nan tout lòt ajans oswa òganizasyon ki kote plent lan tou ke yo te depoze (si sa aplikab).
- Siyati a nan ki pote plent lan ak dat soumèt.

Si yon moun ki pote plent pa kapab oswa pa anmezi pou bay yon deklarasyon ki ekri epi pa gen okenn reprezantan yo fè sa, yo ka yon plent vèbal pou diskriminasyon yo dwe fè yo Tit Koòdonatè BAT VI. Pote plent vèbal ka soumèt (swa an pèsòn, pa telefòn nan (508) 588-2240, oswa atravè yon anrejistremant) nan Koòdonatè Tit VI. Tit VI Koòdonatè pral konvèti akizasyon yo vèbal ekri epi yo bay dokiman an ekri nan Liv la pou konfimasyon, revizyon, ak yon siyati anvan pwosesis. Ki kote pral Pleyan an dwe ede nan konvèti yon plent nan bouch nan yon plent ekri, se Pleyan an oblije siyen plent ekri a.

2.0 Revizyon nan Plent

Sèlman ven yon sèl (21) jou, BAT va konfime resevwa plent la ak ki pote plent lan nan pwosesis la ankèt la.

Lè yo resevwa plent lan, BAT Tit VI Koòdonatè ak lòt anplwaye BAT dwe revize li. Nan swasant (60) jou, yo ta dwe plent lan gen merit, BAT ap kòmanse yon envestigasyon nan akizasyon an (yo). Ankèt la yo ka gen ladan rasanbleman an nan plis enfòmasyon ki soti nan pote plent lan ak / oswa swadizan pati a diskriminasyon (yo). Rezon ki fè yon ankèt se detèmine si gen yon rezon ki fè nou kwè ke te yon echèk konfòme l avèk Tit VI nan Lwa sou Dwa Sivil 1964 te fèt la. Apre yo fini nan ankèt la, Tit VI Koòdonatè la dwe rapòte bay Administratè BAT. Rapò a kapab genyen ladan rekòmandasyon pou aksyon posib nan adrès plent lan. Imedyatman, BAT pral rann yon rekòmandasyon pou aksyon nan yon rapò nan rezilta oswa yon rezolisyon.

Rekòmandasyon yo ka gen ladan yo:

- Voyer plent lan nan yon ajans ki responsab mete ann aplikasyon.
- Idantifye aksyon ratrapaj ki disponib yo ofri reparasyon.
- Idantifye amelyorasyon posib pwosesis yo BAT ki gen rapò ak Tit VI ak jistis anviwonmantal.

3.0 Apèl

Moun ki pote plent lan kapab fè apèl kont repons Prezidan an nan plent lan. Apèl yo dwe nan ekri nan swa nan bagay sa yo pa pita pase 30 jou apre dat la nan repons lan ekri nan Liv la:

MassDOT
Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116

**Department Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Avenue
Washington D.C. 20590**

Nan ka kote yon moun ki pote plent pa kapab oswa pa anmezi pou bay yon apèl ekri epi pa gen okenn reprezantan yo fè sa, yon apèl vèbal nan yon plent nan desizyon diskriminasyon ka fèt nan Koòdonatè Tit VI. Apèl vèbal ka soumèt (swa an pèsòn, pa telefòn nan (508) 588-2240, oswa atravè yon anrejistreman) nan Koòdonatè Tit VI. Tit VI Koòdonatè pral konvèti apèl la vèbal ekri epi yo bay moun ki pote plent la ak dokiman an ekri nan Liv la pou konfimasyon, revizyon, ak yon siyati anvan pwosesis. Nan ka kote yo ap Pleyan an dwe ede nan konvèti yon apèl oral nan yon apèl ekri, se Pleyan an oblije siyen apèl la ekri.

Pwosedi sa yo pa refize dwa pou yo pote plent lan depoze plent fòmèl yo pote ak lòt eta oswa ajans federal oswa yo chèche prive konsèy. Pwosedi sa yo se yon pati nan yon pwosesis administratif ki pa gen ladan domaj pinitif oswa konpansatwa salè pou pote plent lan.

BAT ap voye plent ak repons a plent yo nan Depatman nan Massachusetts la Biwo Transpò a nan Dwa Sivil.

4.0 Rezolisyon

Si yon kòz posib nan yon pratik diskriminatwa ki baze sou ras, koulè, oubyen orijin nasyonal yo jwenn ki egziste, BAT va eseye elimine di pratik pa vle di nan yon Plan Aksyon ratrapaj. Plan ratrapaj dwe gen ladan yon lis tout aksyon korektif aksepte pa ajans lan; yon deskripsyon ki jan yo pral aksyon korektif yo respekté kapab aplike; ak yon asirans ekri ki ajans lan ap aplike aksepte aksyon korektif yo respekté nan fason ki diskite nan plan an.

Ki kote eseye rezoud febli nan plent, va pote plent lan resevwa notifikasyon alekri nan li oswa li dwa yo soumèt plent lan yo bay Administrasyon Federal Transit kòm site nan FTA C4702.1B.

5.0 Plent Tracking

BAT ap kenbe yon boutèy demi lit plen Tit plent VI, pwose, ak investigasyon konsènan diskriminasyon sou baz ras, koulè, oubyen orijin nasyonal. Louvri sesyon an dwe gen ladan dat klasman dosye (yo), rezime akizasyon, estati nan ankèt la, pwosè, oswa plent, ak aksyon BAT. Sa a boutèy demi lit ap disponib pou pèmèt piblik la revize nan biwo yo nan Brockton Zòn Depatman Transpò, 155 Court St, Brockton, MA, pandan lè biznis.

Brockton Area Transit Autoridad Título VI Procedimiento de Queja

Título VI del Acta de Derechos Civiles prohíbe la discriminación por motivos de raza, color u origen nacional en los programas y actividades que reciben asistencia financiera federal. Dos decretos y estatutos relacionados definir aún más las poblaciones que están protegidos en el marco del Título VI. La Orden Ejecutiva 12898 asuntos de justicia ambiental para las poblaciones minoritarias y de bajos ingresos. Orden Ejecutiva 13166 inquietudes proporcionando la igualdad de acceso a los servicios y beneficios para las personas con conocimientos limitados del Inglés (LEP). Los derechos de las mujeres, los ancianos y las personas con discapacidad están protegidos por las leyes similares. Ley General de Massachusetts se extiende esta protección para evitar la discriminación por motivos de religión, el servicio militar, ascendencia, orientación sexual e identidad o expresión de género.

Para cumplir con 49 CFR Sección 21.9 (b), la Autoridad de Tránsito del Área Brockton (BAT) mantiene el siguiente procedimiento para recibir, investigar, direccionamiento y seguimiento de quejas del Título VI.

1.0 La presentación de quejas

Cualquier persona que crea que la Autoridad de Tránsito del Área Brockton le ha sometido o ella o cualquier clase específica de personas a las que la discriminación está prohibida por el Título VI del Acta de Derechos Civiles de 1964, sus modificaciones y estatutos relacionados y programación fondos federales puede presentar una queja por escrito. Las quejas pueden ser sometidas a la discriminación por motivos de raza, color, origen nacional, idioma, sexo, edad, discapacidad, ingresos, la religión, el servicio militar, ascendencia, orientación sexual o identidad de género o expresión. Dicha denuncia deberá ser presentada a más tardar 180 días después de la fecha en que la persona cree que ocurrió la discriminación. Para obtener más información o para presentar una queja en virtud del Título VI o la ley estatal lugares públicos, los contactos son los siguientes:

Brockton Area Transit Authority
Title VI Coordinator
155 Court Street
Brockton, MA 02302
(508) 588-2240
MCAD
One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: (617) 994-6196

Las quejas deberán presentarse por escrito y establecerán la forma más completa posible de los hechos y circunstancias relevantes que rodean la supuesta

discriminación. La siguiente información se incluirá:

- ♣ Nombre, dirección y número de teléfono del denunciante.
- ♣ Una declaración de la demandante, a saber:
 - ♣ La base de la supuesta discriminación (raza, color, origen nacional, o lengua).
 - ♣ Una descripción detallada del presunto acto discriminatorio (s).
 - ♣ Lo que en la naturaleza del hecho imputado (s) condujo al autor a pensar que la discriminación estaba involucrado.
 - ♣ La fecha (s) en que ocurrió el presunto acto discriminatorio (s).
 - ♣ El nombre (s) de la persona (s) acusado de haber participado en el acto (s).
 - ♣ El nombre (s) de todas las otras agencias u organizaciones donde también se presentó la queja (si corresponde).
 - ♣ La firma del autor y la fecha enviada.

Si el demandante no pueda o incapaz de proporcionar una declaración escrita y no tiene designado para ello, una queja verbal de discriminación puede ser hecha al BAT Coordinador del Título VI. Quejas verbales se pueden presentar (ya sea en persona, por teléfono al (508) 588-2240, oa través de una grabación) para el Coordinador del Título VI. El Coordinador del Título VI convertirá los alegatos verbales por escrito y el documento escrito para su confirmación, revisión y firma antes del procesamiento. ¿Dónde se ayudó a la demandante en la conversión de una queja oral en una queja por escrito, se requiere que el demandante a firmar la queja por escrito.

2.0 Revisión de la Queja

Dentro de los veinte (21) días, BAT confirmará la recepción de la reclamación e informará al demandante del proceso de investigación.

Una vez recibida la denuncia, el BAT Título VI Coordinador y otro personal BAT se revise. Dentro de los sesenta (60) días, si la queja tiene mérito, BAT abrirá una investigación de la denuncia (s). La investigación puede incluir la obtención de información adicional por parte del denunciante y / o el presunto discriminante (es). El propósito de la investigación es determinar si existe una razón para creer que se ha producido un incumplimiento con el Título VI del Acta de Derechos Civiles de 1964. Al término de la investigación, el Coordinador del Título VI informará al Administrador BAT. El informe podrá incluir recomendaciones para posibles acciones para hacer frente a la demanda. Posteriormente, BAT emitirá una recomendación para la acción en un informe de los resultados o la resolución.

Las recomendaciones pueden incluir:

- ♣ trasladar la denuncia a un organismo de ejecución responsable.
- ♣ Identificar las medidas correctivas que están disponibles para ofrecer una reparación.
- ♣ Identificar posibles mejoras a los procesos MTD relacionadas con el Título VI y la justicia ambiental.

3.0 Apelaciones

El demandante puede apelar la respuesta del Presidente a la queja. Los recursos deberán presentarse por escrito a uno de los siguientes, a más tardar 30 días después de la fecha de la respuesta por escrito:

MassDOT
Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116

Department Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Avenue
Washington DC 20590

En el caso de que el demandante no pueda o incapaz de proporcionar una apelación por escrito y no tiene designado para ello, un llamamiento verbal a una queja de la decisión de la discriminación pueda hacerse a través del Coordinador del Título VI. Apelaciones verbales pueden presentar (ya sea en persona, por teléfono al (508) 588-2240, o a través de una grabación) para el Coordinador del Título VI. El Coordinador del Título VI convertirá la apelación verbal por escrito y comunicará al demandante el documento escrito para su confirmación, revisión y firma antes del procesamiento. En los casos en que el demandante esté asistida en la conversión de una apelación oral, en una apelación por escrito, se requiere que el demandante a firmar el escrito de apelación.

Estos procedimientos no niegan el derecho del demandante a presentar denuncias formales con otras agencias estatales o federales o de buscar un abogado privado. Estos procedimientos son parte de un proceso administrativo que no incluye los daños punitivos o remuneración compensatoria por la demandante.

BAT remitirá las quejas y las respuestas a las quejas ante el Departamento de la Oficina de Derechos Civiles de Transporte de Massachusetts.

4.0 Resolución

Si no se encuentra una causa probable de una práctica discriminatoria por motivos de raza, color u origen nacional de existir, BAT se esforzará por eliminar dicha práctica mediante un plan de acción correctiva. El plan de medidas correctoras incluirá una lista de todas las acciones correctivas aceptadas por la agencia, una descripción de cómo se llevará a cabo la acción correctiva, y una garantía por escrito de que la agencia pondrá en práctica la acción correctiva aceptada de la manera descrita en el plan.

Cuando intenta resolver el aprovecha reclamación, el demandante deberá ser notificada por escrito de su derecho a presentar la reclamación ante la Administración Federal de Tránsito, como se cita en el TLC C4702.1B.

5.0 Seguimiento de Quejas

BAT mantendrá un registro de las quejas del Título VI, juicios e investigaciones que alegan discriminación por motivos de raza, color u origen nacional. El registro debe incluir la fecha de presentación (s), resúmenes de denuncia, el estado de la investigación, demanda o reclamación, y las acciones tomadas por BAT. Este registro estará a disposición del público en las oficinas de la Autoridad de Tránsito del Área Brockton, 155 Court St., Brockton, MA, en horario de oficina.

01 de noviembre 2012

Brockton Area Transit Authority Título VI Procedimento de Reclamação

Título VI da Lei dos Direitos Civis proíbe a discriminação com base em raça, cor ou origem nacional, em programas e atividades que recebem assistência financeira federal. Duas ordens executivas e estatutos relacionados definir ainda mais as populações que estão protegidos sobre a égide do Título VI. Ordem Executiva 12898 preocupações de justiça ambiental para a minoria e as populações de baixa renda. Ordem Executiva 13166 preocupações proporcionando igualdade de acesso a serviços e benefícios para os indivíduos com limitada proficiência em Inglês (LEP). Os direitos das mulheres, idosos, e pessoas com deficiência estão protegidos por leis semelhantes. Massachusetts Lei Geral amplia essas proteções para evitar a discriminação com base na religião, o serviço militar, ancestralidade, orientação sexual e identidade de gênero ou expressão.

Para estar em conformidade com 49 CFR Seção 21.9 (b), a Brockton Area Transit Authority (BAT) afirma o seguinte procedimento para receber, investigar, endereçamento e acompanhamento queixas Título VI.

1.0 Apresentação de Reclamações

Qualquer pessoa que acredita que o Brockton Area Transit Authority submeteu a ele ou ela ou a qualquer classe específica de pessoas a discriminação que é proibida pelo Título VI da Lei de Direitos Civis de 1964, suas alterações e estatutos relacionados e programação dos fundos federais podem apresentar uma reclamação por escrito. As queixas podem ser apresentadas para a discriminação com base na raça, cor, nacionalidade, língua, sexo, idade, invalidez, renda, religião, serviço militar, ancestralidade, orientação sexual ou identidade de gênero ou expressão. Qualquer reclamação deve ser apresentada no prazo máximo de 180 dias após a data em que a pessoa acredita que a discriminação ocorreu. Para obter informações ou apresentar uma queixa ao abrigo do Título VI ou o estado Acomodações direito público, os contatos são os seguintes:

Brockton Area Transit Authority
Title VI Coordinator
155 Court Street
Brockton, MA 02302
(508) 588-2240
MCAD
One Ashburton Place, 6th Floor
Boston, MA 02109
(617) 994-6000
TTY: (617) 994-6196

As denúncias devem ser feitas por escrito e estabelecerá o mais completamente possível os fatos e circunstâncias relevantes que cercam a alegada discriminação. As

seguintes informações devem ser incluídas:

- ♣ Nome, endereço e número de telefone do denunciante.
- ♣ A declaração do reclamante, incluindo:
 - ♣ A base da alegada discriminação (raça, cor, nacionalidade ou idioma).
 - ♣ A descrição detalhada do alegado ato discriminatório (s).
 - ♣ Que a natureza do suposto ato (s) levou o queixoso a sentir que a discriminação estava envolvido.
 - ♣ A data (s) em que ocorreu o suposto ato discriminatório (s).
 - ♣ O nome do (s) indivíduo (s) acusado de ter participado no ato (s).
 - ♣ O nome (s) de todas as outras agências ou organizações onde a queixa está também a ser apresentados (se aplicável).
 - ♣ A assinatura do reclamante e data apresentada.

Se a denúncia for incapaz ou incapaz de fornecer uma declaração por escrito e não tem designado a fazê-lo, uma queixa verbal de discriminação pode ser feita para o Título BAT Coordenador VI. Reclamações verbais podem ser apresentadas (seja pessoalmente, pelo telefone (508) 588-2240, ou através de uma gravação) para o Coordenador do Título VI. O Título VI Coordenador irá converter as alegações verbais a escrever e apresentar o documento escrito para confirmação, revisão e uma assinatura antes do processamento. Quando o Reclamante será assistido na conversão de uma queixa por via oral em uma reclamação por escrito, o queixoso é obrigado a assinar a queixa por escrito.

2.0 Revisão da Reclamação

Dentro de vinte e um (21) dias, a BAT deverá confirmar o recebimento da denúncia e informar o queixoso do processo de investigação.

Após o recebimento da denúncia, a BAT Título VI Coordenador e outros funcionários BAT deve analisá-lo. No prazo de sessenta (60) dias, se a queixa tem mérito, BAT dará início ao inquérito da alegação (s). A investigação pode incluir a coleta de informações adicionais do autor da denúncia e / ou a alegada discriminação partido (s). O objetivo da investigação é determinar se existe uma razão para acreditar que o desrespeito com o Título VI da Lei de Direitos Civis de 1964 tenha ocorrido. Após a conclusão do inquérito, o Coordenador do Título VI apresentará ao Administrador BAT. O relatório pode incluir recomendações para uma possível ação para resolver a queixa. Posteriormente, BAT tornará uma recomendação para a ação em um relatório de resultados ou de resolução.

Recomendações podem incluir:

- ♣ Encaminhar a reclamação para a agência implementadora responsável.
- ♣ Identificar ações corretivas que estão disponíveis para oferecer reparação.
- ♣ Identificar possíveis melhorias para os processos MTD relacionadas ao Título VI e justiça ambiental.

3.0 Recursos

O queixoso pode apelar a resposta do Presidente da queixa. Os recursos devem ser por escrito para um dos seguintes o mais tardar 30 dias após a data da resposta por escrito:

MassDOT
Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116

Department Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Avenue
Washington DC 20590

No caso em que o denunciante não é capaz ou incapaz de fornecer um recurso por escrito e não tem designado a fazê-lo, um apelo verbal a uma reclamação da decisão discriminação pode ser feita através do Coordenador do Título VI. Apelos verbais podem ser apresentadas (seja pessoalmente, pelo telefone (508) 588-2240, ou através de uma gravação) para o Coordenador do Título VI. O Título VI Coordenador irá converter o apelo verbal para a escrita e facultar ao queixoso com o documento escrito para confirmação, revisão e uma assinatura antes do processamento. Nos casos em que o Reclamante serão atendidas na conversão de um recurso por via oral em um recurso por escrito, o queixoso é obrigado a assinar o recurso por escrito.

Estes procedimentos não negar o direito do reclamante de apresentar queixas formais com outro estado ou agências federais ou procurar um advogado particular. Estes procedimentos fazem parte de um processo administrativo que não inclui danos punitivos ou remuneração compensatória para o queixoso.

BAT irá encaminhar as queixas e as respostas às reclamações ao Departamento do Escritório de Direitos Cíveis de Transporte Massachusetts.

4.0 Resolução

Se a causa provável de uma prática discriminatória com base na raça, cor ou origem nacional encontra-se a existir, BAT devem esforçar-se para eliminar a referida prática, por meio de um Plano de Ação Corretiva. O plano de correção deve incluir uma lista de todas as ações corretivas aceites pela agência, uma descrição de como a ação corretiva será implementado, e garantias por escrito de que a agência irá implementar a ação corretiva aceito na forma descrita no plano.

Onde tenta resolver a falha queixa, o queixoso deve ser notificada por escrito de seu direito de apresentar a reclamação à Administração Federal de Trânsito como citado em FTA C4702.1B.

5.0 Reclamação Rastreamento

BAT manterá um registro do Título VI reclamações, ações judiciais e investigações alegando discriminação com base em raça, cor ou origem nacional. O registro deve conter data do depósito (s), resumos alegação, o estado da investigação, processo legal, ou queixa, e as medidas tomadas pela BAT. Este registro estará disponível para revisão pública na sede da Brockton Area Transit Authority, 155 Court St., Brockton, MA, durante o horário comercial.

01 de novembro de 2012

Appendix E: BAT Title VI Complaint Procedures - Short Notice

BROCKTON AREA TRANSIT AUTHORITY

TITLE VI COMPLAINT PROCEDURES

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin The Brockton Area Transit Authority (BAT) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. BAT investigates complaints received no more than 180 days after the alleged incident. BAT will process complaints that are complete.

Once the complaint is received, BAT will review it to determine justification. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by BAT.

BAT has 60 days to investigate the complaint. If more information is needed to resolve the case, BAT may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, BAT can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

BROCKTON AREA TRANSIT AUTHORITY

TÍTULO VI PROCEDIMENTOS DE RECLAMAÇÃO

Qualquer pessoa que ela acredita ou ele tenha sido vítima de discriminação com base em raça, cor ou origem nacional O Brockton Area Transit Authority (BAT) pode apresentar uma queixa Título VI, preenchendo e enviando Título VI Formulário de Reclamações da agência. BAT investiga denúncias recebidas mais de 180 dias após o suposto incidente. BAT irá processar as reclamações que são completos.

Uma vez que a denúncia seja recebida, BAT irá analisá-lo para determinar a justificação. O denunciante receberá uma carta de aviso informando a ela / ele se a denúncia será investigada pela BAT.

BAT tem 60 dias para investigar a denúncia. Se forem necessárias mais informações para resolver o caso, BAT pode contactar o queixoso. O queixoso tem 10 dias úteis a partir da data da carta para enviar as informações solicitadas para o investigador designado para o caso. Se o investigador não é contactado pelo queixoso ou não receber as informações adicionais no prazo de 10 dias úteis, a BAT pode fechar administrativamente o caso. Um caso pode ser encerrado administrativamente também se o queixoso não pretende exercer o seu caso.

Depois que o investigador analisa a denúncia, ela / ele vai emitir uma das duas letras para o queixoso: a carta de encerramento ou uma carta de encontrar (LOF). A carta de encerramento resume as acusações e afirma que não houve uma violação Título VI e que o caso será encerrado. Um LOF resume as alegações e as entrevistas sobre o suposto incidente e explica se qualquer ação disciplinar, formação complementar do membro da equipe, ou qualquer outra ação ocorrerá. Se o queixoso pretende recorrer da decisão, que ele / ela tem 10 dias após a data da carta ou da LOF para fazê-lo.

A pessoa também pode apresentar uma reclamação diretamente com a Administração Federal de Trânsito, no escritório FTA de Direitos Civis, 1200 New Jersey Avenue SE, Washington, DC 20590

BROCKTON AREA TRANSIT AUTHORITY

Tit VI PWOSEDI POU POTE PLENT

Nenpòt moun ki mete konfyans yo li oswa li te fè diskriminasyon kont sou baz ras, koulè, oubyen orijin nasyonal Brockton Zòn Broward Otorite a (BAT) gen dwa depoze yon Tit VI plent pa ranpli epi soumèt Fòm Tit ajans lan Plent VI. BAT envestige plent yo pa gen plis pase 180 jou apre ensidan an te pretandi. BAT ap travay sou plent ki konplè.

Yon fwa yo plent lan resevwa, BAT pral revize li detèmine jistifikasyon. Moun ki pote plent la ap resevwa yon lèt rekonesans pou enfòmè l' / l' si yo ap pote plent la dwe mennen yon envestigasyon BAT.

BAT gen 60 jou mennen ankèt sou plent lan. Si se pi plis enfòmasyon ki nesèsè rezoud ka a, BAT kapab kontakte moun ki pote plent la. Moun ki pote plent la gen 10 jou ouvrab apatide dat la nan lèt la voye mande enfòmasyon yo bay anketè a asiyen nan ka-a. Si anketè a se pa sa kontakte ou pa pote plent lan oswa ou pa resevwa enfòmasyon an adisyonèl nan lespas 10 jou ouvrab, BAT ka administrativman fèmen ka a. Ou ka jwenn yon ka, administrativman fèmen tou si ki pote plent lan pa gen okenn ankò vle pousuiv ka yo.

Aprè anketè a revize plent lan, li / li ap bay youn nan de lèt bay ki pote plent lan: yon lèt fèmen oswa yon lèt pou jwenn (LOF). Yon lèt ki fèmen rezime akizasyon yo ak eta yo ki pa t 'gen yon vyolasyon VI Tit e ke pwosè a ap fèmen. Yon LOF rezime akizasyon yo ak entèvyou yo konsènan swadizan ensidan yo, epi eksplike si wi ou non nenpòt ki aksyon disiplinè, plis fòmasyon nan manm pèsònèl la, oswa lòt aksyon pral rive. Si moun ki pote plent la vle fè apèl kont desizyon an, li / li gen 10 jou apre dat la nan lèt la oswa LOF a yo fè sa.

Yon moun ka tou depoze yon plent dirèkteman ak Administrasyon Transpò Federal la, nan FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

BROCKTON AREA TRANSIT AUTHORITY

PROCEDIMIENTOS DE QUEJAS TÍTULO VI

Cualquier persona que cree o que ha sido objeto de discriminación por motivos de raza, color u origen nacional de la Autoridad de Tránsito del Área Brockton (BAT) puede presentar una queja del Título VI, completando y enviando el Formulario Quejas del Título VI de la agencia. BAT investiga las quejas recibidas no más de 180 días después del supuesto incidente. BAT procesará las denuncias que se completa.

Una vez recibida la denuncia, BAT lo revisará para determinar la justificación. El autor recibirá un acuse de recibo informando a él / ella si la queja será investigada por BAT.

BAT tiene 60 días para investigar la denuncia. Si se necesita más información para resolver el caso, BAT puede ponerse en contacto con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada para el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no reciba la información adicional dentro de los 10 días hábiles, BAT administrativamente puede cerrar el caso. Un caso puede ser cerrado administrativamente también si el autor ya no desea seguir su caso.

Después de que el investigador analiza la queja, él / ella emitirá una de las dos cartas a la demandante: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre se resumen las alegaciones y afirma que no había una violación del Título VI, y que el caso se cerrará. Un LOF resume los hechos denunciados y de las entrevistas sobre el supuesto incidente, y explica si una acción disciplinaria, se producirá la formación adicional del miembro del personal, u otra acción. Si el demandante desea apelar la decisión, él / ella tiene 10 días después de la fecha de la carta o la LOF hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en la Oficina de Derechos Civiles del FTA, 1200 New Jersey Avenue SE, Washington, DC 20590

Appendix F: BAT Title VI Complaint Form

11/12

Brockton Area Transit Authority Title VI Complaint Form

Tit VI nan 1964 Sivil Lwa sou Dwa ak estati kont diskriminasyon ki gen rapò ak règleman yo oblije ke va pa gen moun nan Etazini yo, sou tè a ras, koulè, orijin nasyonal, sèks, laj oswa enfimite, eskli nan patisipasyon nan, jwenn refize pou benefis yo nan, oswa ou ka viktim diskriminasyon nan nenpòt pwogram oswa aktivite pou resevwa asistans finansye federal.

Enfòmasyon sa yo nesèsè ede nou nan pwosesis plent ou a. Si ou ta mande pou nenpòt ki asistans nan ranpli fòm sa a, tanpri fè nou konnen.

Ranpli ak retounen fòm sa a: Linda Sacchetti, Brockton Area Transit Authority, 155 Court Street, Brockton, MA 02302, (508) 588-2240, and MCAD, One Ashburton Place, 6th Floor, Boston, MA 02109, (617) 994-6000, TTY: (617) 994-6196

1. Non Pleyan-an _____
2. adrès _____
3. ville _____ eta _____ Sèvis Lapòs Kòd _____
4. Nimewo Telefòn (lakay) _____ (travay) _____
5. Moun ki fè diskriminasyon kont (si yon moun lòt pase konfòme la)
non _____
adrès _____
ville _____ eta _____ Sèvis Lapòs Kòd _____
6. Kilès nan sa ki annapre yo ki pi byen dekri rezon ki fè ou kwè diskriminasyon an te pran plas? Te li paske nan ou:
a. Ras / Koulè c. sèks e. Enfimite
b. Orijin Nasyonal d. gen laj
7. Ki sa ki dat li te diskriminasyon sipoze a pran plas?

- 8. Nan pawòl pwòp ou a, dekri diskriminasyon sipoze a. Eksplike sa ki te pase ak moun ou kwè ki te responsab. Tanpri itilize do a nan fòm sa a si ou bezwen plis espas yo mande yo.

- 9. Eske ou te ranpli sa a konfòme ak nenpòt ki lòt ajans federal, leta, oswa ajans lokal yo; oswa avèk nenpòt ki tribinal federal oswa lwa leta? Yes No

Si se wi, tcheke chak ti kare ki aplikab:

Federal ajans tribinal Federal ajans Eta
 Eta tribinal lokal ajans

- 10. Tanpri bay enfòmasyon sou yon moun pou kontakte nan tribinal la ajans / kote yo te plent lan ranpli.

non _____

adrès _____

ville _____ eta _____ Sèvis Lapòs Kòd _____

Nimewo Telefòn _____

- 11. Tanpri siyen anba a. Ou kapab tache nenpòt materyèl ekri nan Liv la oswa lòt enfòmasyon ou panse ki se ki gen rapò ak plent ou a.

Siyati Pleyan-an

Dat

Brockton Area Transit Authority Title VI Complaint Form

Título VI da Lei dos Direitos Civis de 1964 e as estatutas não discriminação e regulamentos exigem que qualquer pessoa nos Estados-Membros, com base na raça, cor, nacionalidade, sexo, idade ou deficiência serão excluídos da participação em, negar os benefícios , ou ser submetido a discriminação sob qualquer programa ou atividade que receba assistência financeira federal.

As informações a seguir é necessário para nos ajudar no processamento de sua reclamação. Caso necessite de assistência para preencher este formulário, por favor nos avise.

Preencha e envie este formulário para: Linda Sacchetti, Brockton Area Transit Authority, 155 Court Street, Brockton, MA 02302, (508) 588-2240, and MCAD, One Ashburton Place, 6th Floor, Boston, MA 02109, (617) 994-6000, TTY: (617) 994-6196

1. Nome do queixoso _____
2. endereço _____
3. cidade _____ estado _____ código postal _____
4. Número de Telefone (casa) _____ (trabalho) _____
5. Pessoa discriminada (se alguém que não seja compatível com o)

Nome _____

endereço _____

cidade _____ estado _____ código postal _____
6. Qual das seguintes alternativas melhor descreve a razão de você acreditar que a discriminação ocorreu? Foi por causa de sua:

a. Raça / Cor	<input type="checkbox"/>	c. Sexo	<input type="checkbox"/>	e. incapacidade	<input type="checkbox"/>
b. origem nacional	<input type="checkbox"/>	d. idade	<input type="checkbox"/>		
7. Em que data é que a alegada discriminação acontece?

8. Em suas próprias palavras, descreva a alegada discriminação. Explique o que aconteceu e quem você acredita que foi o responsável. Por favor use o verso desta forma, se for necessário espaço adicional.

9. De ter apresentado esta compatível com qualquer outro federal, estadual ou agência local, ou com qualquer tribunal federal ou estadual? Yes No

Se sim, verifique cada caixa que se aplica:

agência Federal Tribunal Federal agência Estado
Tribunial Etrado agência local

10. Por favor, forneça informações sobre a pessoa de contato na corte agência / onde a queixa foi apresentada.

Nome _____

endereço _____

cidade _____ estado _____ código postal _____

Número de Telefone _____

11. Por favor, assine abaixo. Você pode anexar qualquer material escrito ou qualquer outra informação que você acha que é relevante para a sua reclamação.

Assinatura do queixoso

Data

Autoridad de Tránsito del Área de Brockton
Título VI - Formulario de Queja

Título VI del Acta de Derechos Civiles de 1964 estatutos y regulaciones relacionadas con la no discriminación requiere que ninguna persona en los Estados Unidos, por motivos de raza, color, nacionalidad, sexo, edad o discapacidad sea excluido de participar en, sea negado los beneficios de, o sea sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor háganoslo saber.

Complete y envíe este formulario a: Linda Sacchetti, Brockton Area Transit Authority, 155 Court Street., Brockton, MA 02302. Teléfono: (508) 588-2240 Ext. 236 y MCAD, One Ashburton Place., 6th Floor. Boston, MA 02109. Teléfono: (617) 994 -6000, TTY: (617) 994-6196

1. Nombre _____ del demandante

2. Dirección _____

3. Ciudad _____ Estado _____ Código Postal _____

4. Número de teléfono (casa) _____ (trabajo) _____

5. Persona discriminada (otra persona además del demandante)

Nombre _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____

6. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que la discriminación ocurrió? Fue debido a su:

- | | | |
|------------------|----------|------------------|
| a. Raza / color: | b. sexo: | c. Discapacidad: |
| d. Nacionalidad: | e. Edad: | |

7. ¿En qué fecha la supuesta discriminación ocurrió?

8. En sus propias palabras, describir la supuesta discriminación. Explique lo que pasó y quien considera que fue responsable. Utilice el reverso de este formulario si necesita más espacio.

9. ¿Ha presentado una denuncia ante cualquier otro programa federal, estatal o local, o ante cualquier tribunal federal o estatal? Sí____ No____

En caso cierto, marque cada casilla que corresponda:

Agencia Estatal Federal Agencia Federal Judicial Agencia Local del Estado

10. Sírvanse a proporcionar información acerca de la persona que contacto en la corte/agencia donde se presentó la queja.

Name_____

Dirección_____

Ciudad_____ Estado_____ Código Postal

Teléfono Number_____

11. Por favor firme abajo. Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Firma del Demandante

Fecha

Appendix G: BAT Title VI No Complaints or Lawsuits Letter


BROCKTON AREA TRANSIT AUTHORITY
155 COURT STREET
BROCKTON, MA 02302
508-588-2240

MEMORANDUM

To: Mary Waldron, Executive Director
From: Charles C. Stevenson, BAT General Counsel
RE: Title VI Report
Date: June 1, 2020

In response to your request, please be advised that there are no active investigations, complaints, or lawsuits naming BAT that allege discrimination with respect to service or other transit benefits.

Please call if you have any questions.



Charles C. Stevenson, General Counsel

Appendix H:

**Old Colony MPO Public
Participation Plan**

Old Colony Metropolitan Planning Organization (MPO)

Public Participation Plan (PPP)

MARCH 2017

- ENDORSED BY THE OLD COLONY MPO ON MARCH 21, 2017

Prepared Under:

Unified Planning Work Program (UPWP) Task 1300 and MassDOT Contracts 88826 and 93149

Prepared By:

[Old Colony Planning Council \(OCPC\)](#), 70 School Street, Brockton, Massachusetts, 508-583-1833


OLD COLONY METROPOLITAN PLANNING ORGANIZATION (MPO)

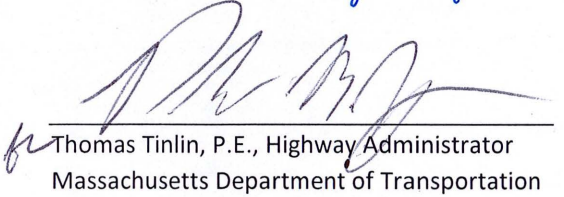
OLD COLONY PUBLIC PARTICIPATION PLAN (PPP)

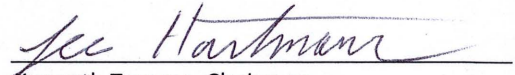
ENDORSEMENT OF THE OLD COLONY PUBLIC PARTICIPATION PLAN

This is to certify that the Signatories of the Old Colony Metropolitan Planning Organization, at their Old Colony MPO meeting on March 21, 2017 hereby approve and endorse the Old Colony Public Participation Plan (PPP) in its entirety for the Old Colony Region, in accordance with the certified 3C Transportation Planning Process.



Stephanie Pollack, Secretary and CEO
Massachusetts Department of Transportation
Date

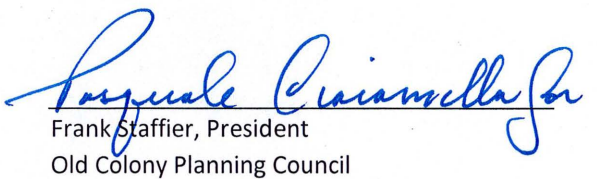
 for 3/21/17
The Honorable Bill Carpenter, Mayor
City of Brockton
Date

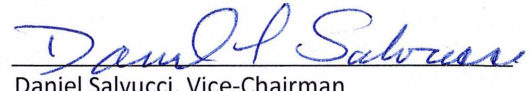

Thomas Tinlin, P.E., Highway Administrator
Massachusetts Department of Transportation
3-21-17
Date
F06


Kenneth Tavares, Chairman
Plymouth, Board of Selectmen
Date


Reinald G. Ledoux, Jr., Administrator
Brockton Area Transit
3.21.17
Date

 3/21/17
Eldon Moreira, Chairman
West Bridgewater, Board of Selectmen
Date


Frank Staffier, President
Old Colony Planning Council
3-21-17
Date

 3/21/17
Daniel Salvucci, Vice-Chairman
Whitman, Board of Selectmen
Date

Ex-Officio Members

Noreen O'Toole, Chairperson
Old Colony Joint Transportation Committee (JTC)

Jeff McEwen, Massachusetts Division Administrator
Federal Highway Administration (FHWA)

Mary Beth Mello, Region 1 Administrator
Federal Transit Administration (FTA)

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Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal “Title VI/Nondiscrimination” Protections

The Old Colony 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, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age, sex, and disability**. These protected categories are contemplated within the Old Colony MPO’s Title VI Programs consistent with federal interpretation and administration. Additionally, the Old Colony MPO 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.

State Nondiscrimination Protections

The Old Colony MPO also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 §§ 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 Old Colony MPO 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**.

Additional Information

To request additional information regarding Title VI and related federal and state nondiscrimination obligations, please contact:

Old Colony Planning Council
Title VI/ Nondiscrimination Coordinator
Pat Ciaramella
70 School Street
Brockton, MA 02301
508-583-1833 Extension 202
pciaramella@ocpcrpa.org

Title VI Specialist
MassDOT, Office of Diversity and Civil Rights
10 Park Plaza
Boston, MA 02116
857-368-8580
TTY: 857-368-0603
MASSDOT.CivilRights@state.ma.us

Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct.

To file a complaint alleging a 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

Translation

English

If this information is needed in another language, please contact the MPO Title VI Coordinator at 508-583-1833 ext. 202.

Spanish

Si necesita esta información en otro idioma, por favor contacte al coordinador de MPO del Título VI al 508-583-1833 ext. 202.

Portuguese

Caso estas informações sejam necessárias em outro idioma, por favor, contate o Coordenador de Título VI da MPO pelo telefone 508-583-1833, Ramal 202

Chinese Simple

如果需要使用其它□ □ □ □ □ □ , □ □ □ Old Colony大都会□ □ □ □ (MPO) 《民□ □ □ 》
□ □ □ □ □ □ , □ □ 508- 583-1833, □ 202。

Chinese Traditional

如果需要使用其他語言瞭解資訊, 請聯繫Old Colony大都會規劃組織 (MPO) 《民權法案》
第六章協調員, 電話508- 583-1833, 轉202。

Vietnamese

Nếu quý vị cần thông tin này bằng tiếng khác, vui lòng liên hệ Điều phối viên Luật VI của MPO theo số điện thoại 508- 583-1833, số máy nhánh 202.

Haitian Creole

Si yon moun bezwen enfòmasyon sa a nan yon lòt lang, tanpri kontakte Koòdonatè a Title VI MPO nan 508-583-1833 ext. 202.

French Creole

Si yon moun vle genyen enfòmasyon sa yo nan yon lòt lang, tanpri kontakte Kowòdinatè MPO Title VI la nan nimewo 508-583-1833, ekstansyon 202.

Russian

Если Вам необходима данная информация на любом другом языке, пожалуйста, свяжитесь с Координатором Титула VI в МРО по тел: 508-583-1833, добавочный 202.

French

Si vous avez besoin d'obtenir une copie de la présente dans une autre langue, veuillez contacter le coordinateur du Titre VI de MPO en composant le 508-583-1833, poste 202.

Italian

Se ha bisogno di ricevere queste informazioni in un'altra lingua si prega di contattare il coordinatore MPO del Titolo VI al 508- 583-1833 interno 202

Mon-Khmer, Cambodian

ប្រសិនបើលោក-អ្នកត្រូវការបកប្រែពីភាសានេះ សូមទាក់ទងអ្នកសម្របសម្រួលជំពូកទី6 របស់ MPO តាមរយៈលេខទូរស័ព្ទ 508-583-1833 រួចភ្ជាប់ទៅលេខ 202។

Arabic

إذا كنت بحاجة إلى هذه المعلومات بلغة أخرى، يُرجى الاتصال بمنسق الفقرة السادسة لمنظمة التخطيط الحضري على الهاتف: 508- 583-1833 و ثم اضغط الأرقام 202.

Updated April 2015
Old Colony Planning Council

Introduction

The Old Colony Metropolitan Planning Organization (MPO) Public Participation Plan (PPP) establishes the process by which the MPO solicits public involvement and cooperative decision making as part of the transportation planning process. The Old Colony MPO strives to share information and collect ideas through public meetings and other strategies in order to improve the planning process and the regional transportation system.

In accordance with state and federal law requirements, and to ensure inclusive and accessible public engagement processes for transportation decision making, the Old Colony MPO has developed the Public Participation Plan. This Plan serves to guide agency public participation efforts, including populations that potentially have been underserved by the transportation system and/or have lacked access to the decision-making process. This Plan guides the MPO in its continued efforts to offer early, continuous, and meaningful opportunities for the public to help identify social, economic, and environmental impacts of proposed transportation policies, projects and initiatives across the Old Colony MPO's jurisdiction.

The Plan is based on federal and state requirements for encouraging and ensuring community participation. It describes the Old Colony MPO's overall goals, guiding principles, and strategic approach to achieving stated objectives. The Plan also defines how the Old Colony MPO proposes to incorporate public participation into its transportation decision-making processes, and how the agency ensures access for people with disabilities and the inclusion of low income and minority stakeholders.

Specifically, the Plan states the methods that the MPO will use to reach out to persons who are low-income, minority, Limited English Proficient (LEP), or have a disability, and other traditionally underrepresented populations. Because different transportation decisions to be made require different techniques for reaching the public, this Plan provides a toolbox of techniques to be applied, as appropriate, to achieve effective participation.

This Plan is a living document that will change and grow to help the Old Colony MPO deepen and sustain its work to engage diverse community members throughout the Old Colony region. Therefore, the Old Colony MPO will modify its public participation methods and activities over time, based on ideas and feedback from community members and the Old Colony MPO's evaluation of its public participation effectiveness and any update to the Plan will be given a 45 day public comment period. The Plan will be reviewed at a minimum every five (5) years; however, periodic review may be taken up at any time. The Plan is being developed based on guidelines provided through the Massachusetts Department of Transportation (MassDOT) and federal guidance documents. It is intended as a document that will govern the Old Colony MPO's public participation activities, but also serve as a useful guide for the metropolitan planning organizations and cities and towns the Old Colony MPO works with, as well as for the consultants we contract with for public engagement support.

The Plan also empowers the public through its clear definition of how the Old Colony MPO conducts its public participation activities. There may be occasions where facts or circumstances may not allow for absolute adherence with the protocols and policies stated. It is important to note that some areas within the Old Colony MPO have pre-existing and approved policies for public engagement that are unique to the functions they carry out or the targeted audiences served, and in such instances, there may be departures from this Plan that are legitimate and reasonable.

OLD COLONY MPO STRUCTURE

The Old Colony Metropolitan Planning Organization (Old Colony MPO) is the regional governing body established by federal law to oversee regional transportation planning and recommend the distribution of transportation funds locally. This includes the responsibilities for conducting an inclusionary “3C” planning process (continuous, cooperative, and comprehensive) for transportation planning in the 17 communities of the region for all modes of travel, including roadways and highways, public transportation, bicycles, pedestrians, connections to air, ferry, and railroads.

The transportation planning area covered by this plan includes the 17 communities of the Old Colony Region: Abington, Avon, Bridgewater, Brockton, Duxbury, East Bridgewater, Easton, Halifax, Hanover, Hanson, Kingston, Pembroke, Plymouth, Plympton, Stoughton, West Bridgewater, and Whitman, and the Brockton Area Transit Authority (BAT).

The Old Colony MPO is responsible for endorsing a number of Federal certification documents that include the Regional Transportation Plan (RTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP). Discussion of these documents is included later in this section of the plan.

The staff of the OCPC, BAT, FHWA, FTA, and, MassDOT, along with staff of the local communities, participates in the process through preparation of the documents for MPO action.

The Old Colony MPO consists of eleven (11) members. The following eight (8) members are voting members: MassDOT; MassDOT Highway Division; Brockton Area Transit Authority (BAT); Old Colony Planning Council (OCPC); City of Brockton; Town of Plymouth; A Community with a population greater than 14,000; and, a Community with a population less than 14,000. The following three (3) members: Old Colony Joint Transportation Committee (JTC) Chairperson, Federal Highway Administration (FHWA), and Federal Transit Administration (FTA) are ex-officio, non-voting members of the Old Colony MPO.

The membership is outlined in Table 1.

TABLE 1: OLD COLONY MPO MEMBERSHIP

Agency	Old Colony MPO Members
Massachusetts Department of Transportation (MassDOT)	Secretary of Transportation
Massachusetts Department of Transportation (MassDOT) Highway Division	Administrator
Brockton Area Transit Authority (BAT)	Administrator
Old Colony Planning Council (OCPC)	President
City of Brockton	Mayor
Town of Plymouth	Chairman, Selectman
Community with a population greater than 14,000	Town Council President/ or Chairman, Board of Selectmen
Community with a population less than 14,000	Chairman, Board of Selectmen
Old Colony Joint Transportation Committee (JTC)	Chairman
Federal Highway Administration (FHWA)	Massachusetts Division Administrator
Federal Transit Administration (FTA)	Region 1 Administrator

Massachusetts Department of Transportation (MassDOT)

Established in 2009, the Massachusetts Department of Transportation (MassDOT) is responsible for transportation planning as well as construction and operation of transportation infrastructure for the Commonwealth of Massachusetts. The organization oversees four divisions: Highway, Rail & Transit, Aeronautics and the Registry of Motor Vehicles, as well as Enterprise Services, which provide services to MassDOT divisions and the Massachusetts Bay Transit Authority (MBTA).

An eleven-member Board of Directors appointed by the Governor with expertise in transportation, finance and engineering oversees the organization. MassDOT is administered by a Secretary of Transportation, appointed by the Governor to serve as Chief Executive Officer.

MassDOT has two voting representatives on the Old Colony MPO: one representing the MassDOT Secretary/Chief Executive Officer and the other representing the MassDOT Highway Division Administrator. The officials may designate another official from within their respective agency to regularly represent the agency. As the implementing agency an affirmative vote is required by the MassDOT representatives to endorse federal certification documents.

Brockton Area Transit Authority (BAT)

The Brockton Area Transit Authority, under the provisions of Chapter 161B of the General Laws, has the statutory responsibility to provide mass transportation in the area constituting the authority, and to provide mass transportation service under contract in areas outside the authority.

BAT, in addition to its statutory responsibility for providing mass transportation, assists in obtaining and ensuring input and participation in multimodal transportation planning from local elected officials and the public. BAT actively and consistently participates in the 3C transportation planning and programming process and represents the region's concern for public transportation deficiencies and for solutions to transportation demands and needs.

The Brockton Area Transit Authority, the FTA Section 5307 applicant, has consulted with the Old Colony Metropolitan Planning Organization (MPO) and concurs that the public involvement process adopted by the MPO for development of the TIP satisfies the public hearing requirements that pertain to the development of the Program of Projects (POP) for the Section 5307, Urbanized Area Formula Program, grant applications including the provisions for public notice and the time established for public review and comment.

The public participation process described herein is used to satisfy the public participation process for the POP for Brockton Area Transit Authority. Public notice of public involvement activities and time established for public review and comments on the TIP will satisfy the POP requirements. BAT prepares a Program of Projects (POP) and it is included in the TIP. The public discussion of the Transportation Improvement Program (TIP) at Old Colony JTC, Old Colony MPO, and transportation meetings satisfies the Program of Projects (POP) public hearing requirements of the Federal Transit Administration (FTA) and is structured to comply with federal and state laws, regulations, executive orders, and related provisions requiring nondiscrimination in public engagement. The MPO's public participation process will also be used as Brockton Area Transit Authority's (BAT) public participation process and Disadvantaged Business Enterprise (DBE) public participation process.

Old Colony Planning Council (OCPC)

Established by Chapter 332 of the Acts of 1967, OCPC is the regional planning agency for the metropolitan Brockton area. The Council's planning jurisdiction includes the City of Brockton and the towns of Abington, Avon, Bridgewater, East Bridgewater, Easton, Duxbury, Hanover, Hanson, Halifax, Kingston, Pembroke, Plymouth, Plympton, Stoughton, West Bridgewater and Whitman. The policy board is composed of one delegate and one alternate appointed by a vote of the Town Council or Board of Selectmen and Planning Board of each member community. In the case of the City of Brockton, the Mayor appoints the delegate and alternate. The Council is authorized to prepare and revise comprehensive plans. OCPC is recognized by the MPO as the officially designated regional planning agency for the Old Colony MPO Region, having the statutory responsibility for comprehensive planning, including transportation planning. Currently, the Council's areas of major emphasis are economic development, transportation, safety and security, water quality, land use and housing, and elder service planning and ombudsman programs.

The OCPC is responsible for comprehensive regional planning and is the transportation-planning

agency for the Old Colony MPO and Old Colony Region. The OCPC maintains qualified transportation planning staff, and is principally responsible for the maintenance of the transportation planning process and for the support and operation of the Joint Transportation Committee and Old Colony MPO.

Local Representatives

The local representatives (Brockton, Plymouth, and the locally elected communities) to the Old Colony MPO are responsible for articulating a local government perspective of regional transportation problems and issues, and the needs for the community or agency that they represent, and for the Region as a whole. The communities of Brockton and Plymouth are permanent voting members of the Old Colony MPO.

In addition to the permanent voting member communities, the Old Colony MPO structure includes Chief Elected Officials from two (2) communities, other than Brockton or Plymouth to serve two-year terms, representing the other communities in the Old Colony Region.

- One Signatory Member from a community with a population less than 14,000 (based on the most recent decennial U.S. Census) (Avon, East Bridgewater, Halifax, Hanover, Hanson, Kingston, Plympton, and West Bridgewater)
- One Signatory Member from a community with a population over 14,000 (based on the most recent decennial U.S. Census) (Abington, Bridgewater, Duxbury, Easton, Pembroke, Stoughton, and Whitman)

In addition, the Old Colony Joint Transportation Committee (JTC) Chairperson, and one representative each from both the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) shall be considered ex-officio, non-voting members of the Old Colony MPO.

Old Colony Joint Transportation Committee (JTC)

The Old Colony MPO has established a committee of technical professionals known as the Old Colony Joint Transportation Advisory Committee (JTC) to serve as the transportation advisory group to the MPO. The JTC Members consist of representatives of the seventeen communities of the Old Colony Region: Abington, Avon, Bridgewater, Brockton, Duxbury, East Bridgewater, Easton, Halifax, Hanover, Hanson, Kingston, Pembroke, Plymouth, Plympton, Stoughton, West Bridgewater, and Whitman, and the Brockton Area Transit Authority. These representatives are appointed by the chief elected officials of each community in the region.

Federal Highway Administration (FHWA)

The Federal Highway Administration (FHWA) is an agency within the U.S. Department of Transportation that supports State and local governments in the design, construction, and maintenance of the Nation's highway system (Federal Aid Highway Program) and various federally and tribal owned lands (Federal Lands Highway Program). Through financial and

technical assistance to State and local governments, the Federal Highway Administration is responsible for ensuring that America's roads and highways continue to be among the safest and most technologically sound in the world.

The Federal Highway Administration (FHWA) was created on October 15, 1966, after having had several predecessor organizations.

Federal Transit Administration (FTA)

The Federal Transit Administration (FTA) provides financial and technical assistance to local public transit systems, including buses, subways, light rail, commuter rail, trolleys and ferries. FTA also oversees safety measures and helps develop next-generation technology research. Transit services supported by FTA span many groups and provide wide-ranging benefits.

Since 1964, FTA has partnered with state and local governments to create and enhance public transportation systems, investing funds to support and expand public rail, bus, trolley, ferry and other transit services. That investment has helped modernize public transportation and extended service into small cities and rural communities that previously lacked transit options.

Old Colony MPO PLANNING PRODUCTS

The Regional Transportation Plan (RTP), Unified Planning Work Program (UPWP), and Transportation Improvement Program (TIP), along with updates on other major studies or documents under development, are included on the JTC and MPO meeting agendas. Old Colony MPO staff presents to the MPO interim updates, draft documents for public comment release and final documents for endorsement. Documents are also presented to the JTC for recommendation on MPO action.

The Old Colony Planning Council staff frequently updates a meeting calendar with proposed agendas and links to documents are available on the [Old Colony Planning Council](#) website. Materials can also be made available via hard copy with 24 hour notice from the Old Colony Planning Council by contacting the office at 508-583-1833.

Regional Transportation Plan (RTP)

The Regional Transportation Plan (RTP) provides goals, policies, and objectives for the transportation system over the next 20 years. It is the long range view of transportation based on existing system data and needs. Through the RTP effort, the Old Colony MPO strives to assess the existing transportation system and its federal aid component, whether transit, highway, pedestrian, or other, and, endeavors to improve the transportation system and its connections for better mobility for residents, commuters, and visitors. The eight goals of the 2016 RTP include: Safety and Security, System Preservation, Regional Mobility and Congestion Management, System Reliability, Economic Vitality, Environmental Sustainability, Transportation

System Equity, and Reduced Project Delivery Costs.

The RTP sets the long-range framework for the region, not only through specific projects, but also through the consensus on general direction and policies. The RTP development process is a very important time for the public to communicate ideas for improving general issues that need to be addressed.

The MPO staff must update the RTP every four years, and additional specific studies may occur in the interim. Once the MPO approves the RTP, they submit it for review by state and federal authorities. The most recent RTP was approved in 2015. The next RTP is set for 2019. A RTP Amendment is the most extensive change procedure that a RTP may undergo. A RTP Amendment requires the proposed changes to undergo a twenty-one (21) day public review period and be formally endorsed by the MPO. However, the Old Colony MPO, at their discretion, may vote to abbreviate the public comment period under what they consider extraordinary circumstances beyond the MPO's control.

Unified Planning Work Program (UPWP)

The Unified Planning Work Program (UPWP) describes annual activities related to the transportation planning in the region. This includes data collection, development of the planning products, staff support for the MPO and JTC, and transportation studies to undertake in the region.

The UPWP is developed each year at public meetings of the MPO for the federal fiscal year that begins on October 1. Although the primary staff involvement is the Old Colony Planning Council, the staff activities of BAT and MassDOT relating to the region are also included.

A UPWP Amendment is the most extensive change procedure that a UPWP may undergo. A UPWP Amendment requires the proposed changes to undergo a twenty-one (21) public review period and be formally endorsed by the MPO. However, the Old Colony MPO, at their discretion, may vote to abbreviate the public comment period under what they consider extraordinary circumstances beyond the MPO's control. Specifically, UPWP Amendments with 21-day public comment period occur when there is an addition of a new task and/or deletion of a previously programmed task.

A UPWP Administrative Modification (Adjustment) is a minor Amendment. The Adjustment procedure requires an administrative action (the change), consultation with the MPO, and MassDOT-OTP approval through the utilization of a Budget Reallocation Request Form. Specifically, TIP Administrative Modifications (Adjustments) with an approval vote from the MPO and sign-off from MassDOT-OTP occur when there is a modification of budget or scope to an already programmed task.

Transportation Improvement Program (TIP)

From the RTP, proponents of projects and programs move items toward implementation. Following evaluation by the MPO staff, the JTC, and the MPO, projects graduate to the list of funded items. While the RTP process requires covering a minimum of 20 years, the TIP comprises five (5) years of projects.

The TIP includes both "highway" and transit projects. "Highway" projects are typically construction projects which include projects such as intersection improvements, roadway reconstruction, multi-use path construction, bridge repairs, and various maintenance activities. A list of transit projects for inclusion in the TIP is prepared by BAT. All projects programmed in the TIP must be within the anticipated funding available from federal, state, and other identified funding sources.

The Brockton Area Transit Authority, the FTA Section 5307 applicant, has consulted with the Old Colony Metropolitan Planning Organization (MPO) and concurs that the public involvement process adopted by the MPO for development of the TIP satisfies the public hearing requirements that pertain to the development of the Program of Projects (POP) for the Section 5307, Urbanized Area Formula Program, grant applications including the provisions for public notice and the time established for public review and comment.

The public participation process described herein is used to satisfy the public participation process for the POP for Brockton Area Transit Authority. Public notice of public involvement activities and time established for public review and comments on the TIP will satisfy the POP requirements. BAT prepares a Program of Projects (POP) and it is included in the TIP. The public discussion of the Transportation Improvement Program (TIP) at Old Colony JTC, Old Colony MPO, and transportation meetings satisfies the Program of Projects (POP) public hearing requirements of the Federal Transit Administration (FTA) and are structured to comply with federal and state laws, regulations, executive orders, and related provisions requiring nondiscrimination in public engagement. The MPO's public participation process will also be used as Brockton Area Transit Authority's (BAT) public participation process and Disadvantaged Business Enterprise (DBE) public participation process.

A TIP Amendment is the most extensive change procedure that a TIP may undergo. A TIP Amendment requires the proposed changes to undergo a twenty-one (21) day public review period and be formally endorsed by the MPO. However, the Old Colony MPO, at their discretion, may vote to abbreviate the public comment period under what they consider extraordinary circumstances beyond the MPO's control. TIP Amendments are prompted by:

- Significant funding changes in a project
- A project that is not programmed on the TIP is requested to be put on the TIP. (Moving a project back from the previous TIP to the current TIP is an exception – see below)

A TIP Adjustment/ Administrative Modification is a minor Amendment. The Adjustment procedure generally requires an administrative action (the change), Joint Transportation Committee advice, and MPO signatory notification of the change. Adjustments or Administrative Modifications to the TIP are minor amendments such as adding projects to the Illustrative Project Listing, and the procedure requires an administrative action (the change), JTC advice, and Old Colony MPO notification of the change. TIP Adjustments are prompted by:

- A project currently on the TIP is moved into the active year element (e.g. FFY 2017), including Mega projects as long as the TIP remains financially constrained
- A modest funding change
- A project is split into one or more projects
- A project listed in the FFY 2017-2021 TIP, and is not advertised in FFY 2017 is moved into the FFY 2018-2022 TIP.

Corridor and Area Plans

MPO staff also prepares corridor and area planning studies, as identified in the UPWP, to identify transportation issues and develop potential solutions. The studies identify the transportation issues by closely examining the existing and expected future conditions within each study area. Elements evaluated include the design of the existing transportation facilities, transit services available, accommodation of non-motorized modes of transportation, traffic volumes, levels of congestion, and potentially unsafe conditions.

Recommendations developed from these studies are generally assigned to one of two groups based on a number of factors including overall cost and expected impacts. The projects with relatively low costs and few impacts are generally more short-term, with an expected implementation time frame of 5 to 10 years. The projects with a relatively high construction cost and more impacts are generally more long-term, with an expected implementation time frame of more than 10 years. These studies help to inform the MPO in its transportation decision-making role for the region.

FEDERAL TRANSPORTATION LEGISLATION

ISTEA - 1991

The 1991 federal legislation known as the **Intermodal Surface Transportation Efficiency Act (ISTEA)** required States and MPOs to significantly expand opportunities for the public to become involved in the metropolitan and statewide transportation planning processes. The Final Rule on Statewide Planning and Metropolitan Planning for ISTEA states: "The metropolitan transportation planning process shall include a proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing plans and TIPs."

In addition, the Rule states that any modification to this public participation program requires a comment period of not less than 45 days. A public comment period must be provided prior to the approval or revision of any plan. In addition, MPOs must seek out and consider the needs of those individuals and groups that have been traditionally underserved by transportation systems.

Metropolitan Planning Organizations must establish and periodically review and update public involvement processes. The process should assure early and continued public awareness of, and access to, the transportation decision-making process.

TEA-21 - 1998

The Transportation Equity Act for the 21st Century (TEA-21) enacted in 1998 reaffirms the requirement for public involvement opportunities and additionally requires that:

"before approving a long-range transportation plan [or the annual TIP], each metropolitan planning organization shall provide citizens, affected public agencies, representatives of transportation agency employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transit, and other interested parties with a reasonable opportunity to comment on the long-range transportation plan [or the TIP]."

SAFETEA-LU – August 10, 2005

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users

(SAFETEA-LU) authorizes the Federal surface transportation programs for highways, highway safety, and transit for the 5-year period 2005-2009. An extension of the funding for SAFETEA-LU through September 30, 2010 was provided by the HIRE (Hiring Incentives to Restore Employment) Act on March 18, 2010. In March 2010, Congress extended the Safe, Accountable, Flexible, Efficient Transportation Act: A Legacy for Users (SAFETEA-LU) through the end of fiscal-year 2011, freezing funding at 2010 levels for transit and other programs through September 30, 2011 and extended again to March 2012.

MAP-21 - July 6, 2012

MAP-21, the Moving Ahead for Progress in the 21st Century Act (P.L. 112-141), was signed into law on July 6, 2012. Notable changes included a performance based planning process. The SAFETEA-LU Act required the Metropolitan Planning Organizations (MPO) to provide for consideration of projects and strategies that will serve to advance eight (8) transportation planning factors. These factors were unchanged with the passage of MAP-21 and are as follows:

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
2. Increase the safety of the transportation system for motorized and non-motorized users;
3. Increase the security of the transportation system for motorized and non-motorized users;
4. Increase the accessibility and mobility of people and for freight;

5. Protect and enhance the environment, promote energy conservation, improve quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
6. Enhance the integration and connectivity of the transportation system, across and between modes for people and freight;
7. Promote efficient system management and operation; and
8. Emphasize the preservation of the existing transportation system.

FAST ACT – December 4, 2015

On December 4, 2015, the **Fixing America's Surface Transportation (FAST) Act** (Pub. L. No. 114-94) was signed into law. The law provides long-term funding certainty for surface transportation infrastructure planning and investment. The FAST Act authorizes \$305 billion over fiscal years 2016 through 2020 for highway, highway and motor vehicle safety, public transportation, motor carrier safety, hazardous materials safety, rail, and research, technology, and statistics programs. The FAST Act maintains our focus on safety, keeps intact the established structure of the various highway-related programs we manage, continues efforts to streamline project delivery and, for the first time, provides a dedicated source of federal dollars for freight projects. With the enactment of the FAST Act, states and local governments are now moving forward with critical transportation projects with the confidence that they will have a federal partner over the long term.

OLD COLONY MPO PUBLIC PARTICIPATION GOALS

The MPO has the following public participation goals that agency representatives and those working in concert with the Old Colony MPO on transportation projects and initiatives should strive to achieve:

1. Obtain Quality Input and Participation
 - Comments received by the Old Colony MPO are to be encouraged and reviewed to the extent they can be useful, relevant, and constructive, and contribute to better plans, projects, programs, and decisions.
2. Establish Consistent Commitment
 - The Old Colony MPO strives to communicate regularly and develop trust with communities, while helping build community capacity to provide public input, as needed.
3. Increase Diversity
 - Participants who are encouraged to participate in public engagement processes should represent, as appropriate to a project or those impacted, a range of socioeconomic, ethnic, and cultural perspectives and include people from low-income and minority neighborhoods, people with limited English proficiency, and other traditionally underserved people.
4. Ensure Accessibility

- Every effort should be made to ensure that participation opportunities are physically, geographically, temporally, linguistically and culturally accessible.
5. Provide Relevance
 - Issues are framed clearly and simply such that the significance and potential effect may be understood by the greatest number of participants.
 6. Foster Participant Satisfaction
 - The Old Colony MPO should encourage the public to participate in project and initiative related discussions, recognizing that people who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
 7. Clearly Define Potential for Influence
 - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
 8. Establish and Maintain Partnerships
 - The Old Colony MPO develops and maintains partnerships with communities and community-based organizations through the activities described in the PPP.
 9. Provide Opportunities to Build Consensus
 - The Old Colony MPO should ensure that discussions, particularly where there are conflicting views, are structured to allow for levels of compromise and consensus that will satisfy the greatest number of community concerns and objectives. The Old Colony MPO recognizes that processes which allow for consensus to be achieved are critical to enable public support for recommended actions.

GUIDING PRINCIPLES FOR PUBLIC PARTICIPATION AT THE OLD COLONY MPO

The Old Colony MPO recognizes the following principles in achieving its goals for public participation:

1. Promote Respect
 - All transportation constituents and the views they promote should be respected. All feedback received should be given careful and respectful consideration. Members of the public should have opportunities to debate issues, frame alternative solutions, and affect final decisions.
2. Provide Proactive and Timely Opportunities for Involvement
 - Avenues for involvement should be open, meaningful, and organized to let people participate comfortably, taking into consideration accessibility, language, scheduling, location and the format of informational materials. Meetings should be structured to allow informed, constructive dialogue, be promoted broadly and affirmatively; and be clearly defined in the early stages of plan or project development. Participation activities

should allow for early involvement and be ongoing and proactive, so participants can have a fair opportunity to influence the MPO decisions. Opportunities for comment both during a standard comment period as well as after significant changes will be provided.

3. Offer Authentic and Meaningful Participation

- The Old Colony MPO should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels. Public processes should provide participants with purposeful involvement, allowing useful feedback and guidance.
- Participants should be encouraged to understand and speak with awareness of the many competing interests, issues, and needs that lead to transportation ideas and projects.

4. Provide a Clear, Focused, and Predictable Process

- The participation process should be understandable and known well in advance. This clarity should be structured to allow members of the public and officials to plan their time and use their resources to provide input effectively. Activities should have a clear purpose, the intended use of input received made clear, and all explanations described in language that is easy to understand.

5. Foster Diversity and Inclusiveness

- The Old Colony MPO should proactively reach out to and engage people with disabilities, as well as low-income, minority, limited English proficient community members and other traditionally underserved populations.

6. Be Responsive to Participants

- The Old Colony MPO meetings should facilitate discussion that address participant's interests and concerns. Scheduling should be designed to meet the greatest number of participants possible and be considerate of their schedules and availability. Informational materials provided should be clear, concise and responsive to known community concerns, while avoiding misleading or biased suggestions or solutions.

7. Record, Share and Respond to Public Comments

- Public comments, written and verbal, should be given consideration in the MPO decision making processes and reported in relevant documents. Specifically, public comments provide an opportunity for shared knowledge among the Old Colony MPO departments and transportation partners, but also require clear responses that are documented to demonstrate that community input was in fact addressed. The Old Colony MPO should communicate the impact of the public input on decisions at a broad summary level, describing the major themes, the decisions reached, and the rationales for the decisions.

8. Self-evaluation and Plan Modification

- The effectiveness of this Plan will be reviewed periodically to ensure it meets the needs of the public, and will be revised to include new strategies and approaches.

Old Colony MPO Approach to Public Participation

Transportation decision making and project development processes follow set procedures, including the need to give the public opportunities to participate. These public involvement objectives are further shaped by the Old Colony MPO's commitment to civil rights related obligations, such as removal of barriers to participation, diversity, and inclusive outreach. This Public Participation Plan describes participation opportunities generally and includes specific protocols and resources that are designed to facilitate diverse and inclusive public outreach and involvement. The plan is a flexible and an evolving document. As necessary, the MPO will revise the PPP based on recurring assessments of successes and/or challenges associated with outreach, as well as suggestions made and the results of public engagement processes.

In this section, a general description of the Old Colony MPO's public participation activities is presented. The next section contains the specific civil rights protocols utilized by the MPO for all public outreach activities, categorized by types of communication formats, including large group discussions targeted group engagement and one-on-one interactions. The next chapter also contains the MPO Accessible Meeting Policy. The view is that if these objectives and standards are consistently applied to the different types of public meetings the MPO convenes or participates in, the resulting discussions and resolution of issues will be inclusive and accessible to all.

PUBLIC PARTICIPATION TECHNIQUES

The Old Colony MPO takes pride in its work to maintain a collaborative relationship with community and municipal stakeholders and has strategically developed this Public Participation Plan to foster collaboration in an all-inclusive manner. The Old Colony MPO public outreach effort rests on utilizing multiple communication channels to distribute information to and solicit input from affected constituencies. The Old Colony MPO typically communicates with the general public through one or more of the following methods:

- The [Old Colony MPO](#) section of the Old Colony Planning Council website,
- Public Media (including English and non-English newspapers, radio stations, and television stations)
- Press releases
- Posters, display boards, and flyers
- Project fact sheets
- Brochures
- Newsletters
- Public service announcements
- Public comment period on draft documents
- Mailing and email distribution lists
- Information stands at local events

- Social media, such as Twitter (https://twitter.com/OCPC_Planning) and Facebook (<https://www.facebook.com/oldcolonyplanningcouncil/>)
- Legislative briefings
- Presentations, public meetings, public hearings, open houses, and workshops
- Civic advisory committees and working groups

Public Comment on Draft Documents

The Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), and Unified Planning Work Program (UPWP) prepared for the Old Colony MPO are presented to the Old Colony MPO as draft and released by vote for public comment periods. At this time, the Old Colony Planning Council Staff announces the public comment period and distributes the draft document(s) for public review and comment(s). Comments received by staff are documented, presented to the Old Colony MPO and may cause changes to the document. After the public comment period, the Old Colony MPO can endorse, reject or re-release the draft document for an additional comment period by vote. An additional opportunity for public comment will be provided if the final RTP or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts. The comment period for the documents may be abbreviated as determined by the Old Colony MPO. The public comment periods for these plans and programs are as follows:

- 21 days for the Regional Transportation Plan (RTP), and any amendments to the aforementioned plans and programs.
- 21 days for the Transportation Improvement Program (TIP) and any amendments to the aforementioned plans and programs.
- 21 days for the Unified Planning Work Program (UPWP), and any amendments to the aforementioned plans and programs.
- 45 days for the Public Participation Plan (PPP) and any amendments to the aforementioned plan.

A minimum public comment period of 21 days has been established for the RTP, TIP, UPWP, and Amendments, however, the Old Colony MPO at their discretion, may vote to abbreviate the public comment period under what they consider extraordinary circumstances beyond the MPO's control.

Old Colony MPO interested parties

The Old Colony MPO seeks to define a process in this plan that ensures that affected stakeholders are included in the process, including community members, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportations services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle

transportation facilities, representatives of individuals with disabilities, and other interested parties have reasonable opportunities to be involved in the transportation planning process.

The Old Colony MPO Website

Many people use the Internet as their main source of data and information. The transportation section of the Old Colony Planning Council website is a resource for people wanting information about the Old Colony MPO programs, projects, and activities. Public notices of all the MPO meetings, public hearings, and public comment periods are posted on this site, along with information about the Old Colony MPO programs, projects, and activities. Some programs and projects have dedicated webpages that include:

- Information about upcoming meetings
- Project presentations and fact sheets
- Summary notes for meetings/workshops on the project
- Process to be added to the project's electronic distribution list

Project websites are important tools for people who cannot attend meetings. Members of the public can review presentations and meeting summaries and provide comments through emails and letters to the Old Colony MPO staff. People who cannot attend meetings may also review information on the website and submit comments to the Old Colony MPO.

Meeting Notice Content and Distribution

The Old Colony MPO announces all meetings, public hearings, open houses, workshops, and public comment periods through press releases, email, mailings, and/or the distribution of informational meeting flyers as well as placing meeting information on the Old Colony MPO website and posting on the Old Colony Planning Council bulletin board as may be required by the Massachusetts Open Meeting Law. Notices are published in local English newspapers, and if the project has an impact on low income or minority populations, an effort is made to place notices in media that serves local, minority and non-English speaking communities in regions across the Old Colony Region. Meeting notices will include information about getting to a meeting location using public transportation, when transit is available. The Old Colony MPO notices also let people know they can request foreign language assistance, and that sign-language interpreters and other accommodations are available on request for people with disabilities (with timely notification).

There is also information that advises people whom to contact with questions or concerns. The information for these meetings and the informational materials provided at the meetings can be translated into languages other than English, as needed.

Public Meetings, Open Houses, Public Hearings, and Workshops

Public Meetings

Public meetings are held to present information to or about the Old Colony MPO and provide

the public an opportunity for input from community residents. Meetings provide a time and place for face-to-face contact and two-way communication. One method that may be used is comment cards.

They are generally tailored to specific issues or community groups and can be either informal or formal. Public meetings are used to disseminate information, provide a setting for public discussion, and receive feedback from the community.

Open Houses

Open houses are informal settings where people can obtain information about a plan, program, or project. They do not have formal agendas, and no formal discussions or presentations take place. At open houses, people receive information informally from exhibits and staff, and they are encouraged to give opinions, make comments, and state preferences to staff, orally or in writing. Informal presentations, slide shows, and one-on-one discussions take place continuously throughout the event, which usually includes a series of stations: a reception area; a presentation area for slide shows or short talks; areas for one-on-one discussions between community people and agency staff members; and displays of background information, activities to date, work flow, and anticipated next steps, accompanied by an array of primary subject panels. Since there is no fixed agenda, open houses are usually scheduled for substantial portions of a day or evening, so that people can drop in at their convenience and fully participate.

Note that Open Houses often involve one-on-one discussion of issues or concerns between meeting participants and Old Colony MPO representatives. The content and nature of these informal exchanges is not easily captured in documents such as meeting summaries or notes. Thus, Old Colony MPO representatives that have such an exchange are instructed to relay the content to both the Old Colony MPO and the Old Colony Title VI Coordinator so that these issues are catalogued and tracked, as needed.

Public Hearings

A public hearing is more formal than a public meeting. The public hearing is an opportunity for members of the public to make recorded statements of their views immediately before project decision making. A public hearing is held prior to a decision point, to gather community comments and hear the positions of all interested parties for the public record and input into decisions. Public hearings are required by the federal government for many transportation projects and have specific legal requirements.

The Old Colony MPO views the hearing as a specific, observable administrative benchmark for public involvement, and will utilize the MassDOT Public Design Hearings for TIP Projects to satisfy this requirement.

Meeting Facilities and Accessibility

The Old Colony MPO is required to hold meetings, open houses, and workshops in accessible facilities that are, wherever possible, at locations close to or served by fixed route transit service. For facilities not located on fixed route transit service, potential participants should be made aware of the door-to-door paratransit service offered by BAT (DIAL-A-BAT) and GATRA (Dial-A-Ride). For this door-to-door paratransit service, certain eligibility criteria apply.

Who is Eligible for BAT DIAL-A-BAT?

- Anyone, regardless of age, who by reason of physical or developmental disability is unable to ride a regular bat bus.
- Anyone 65 years or older.

For more information, please visit <http://www.ridebat.com/dial-a-bat/> or call BAT at 508-638-5920.

Who is Eligible for GATRA Dial-A-Ride?

- A person with a disability that limits one major life function who cannot, because of a disability, use public transportation.
- A person with a disability who, because of certain conditions, is not able to use public fixed-route transportation.
- A person 60 years of age or older.

For more information please visit <http://www.gatra.org/index.php/special-services/dial-a-ride/> or call GATRA Dial-A-Ride at 508-222-6106.

Meeting planners must conduct an analysis of the demographics of the area where the meeting is to be held to determine whether notices should be translated into languages other than English. The availability of handout materials in alternate formats, as well as other accommodations (language interpreters, sign language interpreters, CART translators, etc.) must be indicated in the meeting notices along with specific information on how to request these accommodations.

Old Colony MPO meeting planners should research and make every effort to select the location, size, and setup of meeting facilities based on the specific characteristics of the audience and the type of information to be presented. Whenever possible, hearings, meetings, open houses, and workshops should be held in places that are centrally located to the project and likely to attract a cross section of the people and businesses representative of the community stakeholders.

Local government buildings, public libraries, public schools, and community centers are often used.

The Old Colony MPO meeting staff members that are charged with the coordination of any meeting are responsible for coordinating resources, including free accessibility assistance and

language assistance as outlined in this plan, to ensure that the event is accessible to all people and to provide the greatest opportunity for participation by interested parties.

Tailoring Outreach to Underserved People

Along with scheduling a room, posting notices and ensuring accommodations are in place for a meeting to be well attended; meeting planners are also obligated to conduct outreach to encourage attendance, and to include those groups protected by anti-discrimination laws.

Many people in minority and low-income communities, as well as those with low literacy and/or limited English proficiency, have traditionally been underserved by conventional outreach methods. Outreach to traditionally underserved groups helps ensure that all constituents have opportunities to affect the decision-making process. It sets the tone for subsequent project activities and promotes a spirit of inclusion. The greater the consensus among all community members, the more likely the position agreed upon will aid in decision making for the plan, program, or project. Inclusive outreach efforts are particularly useful because they:

- Provide fresh perspectives to project planners and developers
- Give the Old Colony MPO firsthand information about community specific issues and concerns
- Allow the Old Colony MPO to understand potential controversies
- Provide feedback to the Old Colony MPO on how to get these communities involved
- Ensure that the solutions ultimately selected will be those that best meet all of the communities' needs

By interacting with community members, the Old Colony MPO staff will gain insight into the reasons why community members agree or disagree with proposed plans or projects. The perspective of traditionally underserved people can inform the goals and outcomes of planning and project development. Such individuals can suggest fresh approaches to transportation issues that otherwise might not be raised. The Old Colony MPO's public outreach efforts are designed to accommodate the needs of low-income, minority, Limited English Proficiency, and other traditionally underserved people throughout all phases of any public participation process.

Traditional techniques may not be the most effective. It is important to use a variety of public involvement techniques when working with underserved populations and communicating with community leaders to find out the best techniques for working with a particular group (e.g., which approaches to use, where and when to hold events, how to recruit people, and what to avoid doing).

Title VI and ADA Protocols, Policies, and Resources

The civil rights protocols set forth in this document are a baseline for holding inclusive, accessible and responsive public meetings and hearings.

The Old Colony MPO conducts and participates in many meetings and hearings within the course of their operations. These Protocols are designed to support the basic form and structure of existing operations.

These protocols include steps and strategies to implement prior to holding a public meeting or other such activity during the course of the public process.

Meetings should be tailored to the special needs of the community, and/or the target audience and subject matter to be addressed. Effective public participation from a civil rights perspective includes awareness of the local population (demographics) or individuals to be engaged, including languages spoken, represented cultural groups, community organizations and leaders and key players. Equally critical to an effective meeting are well communicated (effectively circulated across types of media, and translated when needed) and timely notice, early response and coordination on requests for language assistance for limited English proficient individuals or reasonable accommodation for people with disabilities.

Federal nondiscrimination obligations, through Title VI of the Civil Rights Act of 1964, Section 504 and 508 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA) include the categories of race, color, national origin (including LEP), age, sex, and disability. These protocols are designed to ensure that sufficient consideration of outreach to and inclusion of these groups is incorporated into the Old Colony MPO's public engagement procedures. These protocols will also sufficiently address State-level nondiscrimination obligations. State level protections include the federal protections plus ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, veteran's status (including Vietnam-era veterans), and background.

CIVIL RIGHTS PROTOCOLS BY TYPE OF PUBLIC ENGAGEMENT

The following represent the four types of public engagement most commonly encountered by the Old Colony MPO employees:

- Meetings for the general public
- Targeted outreach gatherings
- Open houses
- One-to-one interactions

An introduction to each of these four types of public engagement is provided below. Familiarity with the following descriptions will help inform the user on how they should navigate the protocols set forth in this document.

Meetings for the General Public

Public meetings and hearings, both at the project level and more broadly, are an opportunity for members of the public to engage in the transportation decision making process. The civil rights considerations described in this section are designed to inform and guide all the Old Colony MPO staff involved in planning and conducting such events. Incorporation of these processes and utilization of these resources when planning or participating in public meetings/hearings will help ensure that these events are Title VI compliant.

Open Houses

At times, Old Colony MPO staff may interact with members of the public through “open house” sessions prior to meetings/hearings. These sessions afford members of the public an opportunity to view design plans for projects that will be discussed at the formal public outreach event.

The Old Colony MPO staff is on hand to discuss particular details of interest with members of the public. While the interactions during these sessions are informal, critical issues are often raised. The Old Colony MPO staff strives to address these issues accurately and effectively during these sessions.

Targeted Outreach Gatherings

At times, the complexity of a project, controversial issues, or the reality of having multiple large Title VI groups to address may require engaging targeted audiences of stakeholders. Similarly, the Old Colony MPO may at times convene selected people within advisory committees, research efforts, and/ or focus groups. The general work of understanding the demographics of people in a locality or project area still apply to determine what Title VI groups are impacted by an initiative, as described above. However, there may also be a need to include strong and possibly visible community leaders within Title VI populations; this can require more subtle and challenging efforts to secure their participation and needed contribution to discussions or deliberations.

One-to-One Interactions

The Old Colony MPO staff members interact directly with the public by virtue of the public facing programs, services, and activities the organization provides. These interactions can include planned meetings, such as those with property and business owners directly impacted by transportation projects, and spontaneous interactions with members of the public. These interactions, whether in person, over the phone, or electronic, present particular civil rights related risk factors that can be mitigated through the strategies articulated herein.

MEETINGS FOR THE GENERAL PUBLIC

Preliminary/ Ongoing Considerations

1. Identify the population and composition of the individuals/ communities impacted by the Old Colony MPO program, service, or activity by considering the following:
 - a. Project parameters, such as location, areas that will be impacted by construction phases, areas that may benefit from the completed project, and the areas that may be burdened by the completed project
 - b. The nature of the program, service, or activity (is it connected to the project development process? is it statewide, regional or local?)

2. Determine the Title VI features of the community to be engaged by reference to the Old Colony MPO's Title VI maps, which include the limited English proficient (LEP) and minority populations across the Region. Appendix A for reference:
 - a. Limited English Proficiency: Individuals Who Speak English and Speak English Less than Very Well
 - b. Limited English Proficiency: Individuals Who Speak Spanish or Spanish Creole and Speak English Less than Very Well
 - c. Limited English Proficiency: Individuals Who Speak Haitian Creole and Speak English Less than Very Well
 - d. Limited English Proficiency: Individuals Who Speak Portuguese or Portuguese Creole and Speak English Less than Very Well
 - e. Percent Minority by Census Block
 - f. Environmental Justice Populations

Additionally, the following maps and resources should be consulted:

- a. US Census Bureau Language
 - i. Mapper
http://www.census.gov/hhes/socdemo/language/data/language_map.html?eml=gd

 - b. MassDOT "Engage" - Outreach and Engagement
 - i. Tool
<http://gis.massdot.state.ma.us/maptemplate/engage>
-
3. Identify key Title VI-related and other community based organizations and community leaders. It may be helpful to utilize well established connections with individuals and groups. These instructions provide the steps to identify previously unknown points of contact to diversify outreach:
 - a. Utilize the Old Colony MPO's expanded contacts list that includes social service, health care, and other community based organizations that may have connections with traditionally underserved populations.

Meeting Location and Time

1. Title VI Considerations

- a. Consult with community leaders and community based organizations that have been identified to identify any aspects of the community which may be central in determining the time and location of the public engagement activity. Doing so informs the cultural, ethnic, religious, gender, and political histories/experiences of the demographic groups in the locale which better inform meeting planning.
- b. Consider factors such as cultural sensitivities and/or professional and academic commitments in setting the number of meetings. Multiple meetings may be held at various locations and times if doing so promotes meaningful access to the public engagement opportunity.
- c. Where possible, select a meeting location near public transportation options. For meeting locations not located on fixed route transit service, potential participants should be made aware of the door-to-door paratransit service offered by BAT and GATRA. For this door-to-door paratransit service, certain eligibility criteria apply.

2. ADA Considerations

- a. Identify a venue for the public meeting that is ADA compliant and accessible to people with disabilities.
 - i. The Old Colony MPO will maintain an Accessible Facilities Database that contains updated information regarding venues that have been previously assessed for ADA compliance.
- b. If an appropriate venue cannot be identified in the database, the following resources can identify public meeting venues that may be accessible:
 - i. The Massachusetts Office on Disability
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/mod/>
 - ii. The Disability Commissions
<http://www.mass.gov/anf/docs/mod/commission-listing.doc>
 - iii. The Independent Living Centers
<http://www.masilc.org/membership/cils>
- c. Take the opportunity afforded by early communication with venue staff to identify pre-existing accessibility accommodations, such as assistive listening devices and Communication Access Real-Time Translation (CART) equipment
- d. For the full treatment regarding ADA obligations in the public outreach context, consult the Old Colony MPO Accessible Meeting Policy. The policy enumerates the ADA obligations in the public meeting context and provides a checklist for holding an ADA accessible public meeting.

Coordinating Public Notice

1. Draft the public meeting notice document, either utilizing existing approved templates or creating a new one, ensuring that the following civil rights related components are

included:

- a. Notice of Nondiscrimination
 - b. Availability of language services and reasonable accommodations
 - c. Contact information and procedures for requesting the above services, additional information, or to express a concern
 - d. International Symbol of Accessibility
http://en.wikipedia.org/wiki/International_Symbol_of_Access
2. Public meeting notices must be accessible.
 3. Address language needs and utilize non-English language outreach resources in the dissemination area if individuals who have limited proficiency in English are present as has been identified by the LEP maps.
 - a. Identify non-English language media (print, TV, radio, online, etc.) and sites with a strong presence of individuals who have limited proficiency in English (transportation facilities, community centers, libraries, commercial/ employment/ educational establishments, places of worship, cultural centers, etc.) that may be effective in communicating notice to individuals who have limited proficiency in English. The following resources may be consulted:
 - i. The MassDOT Office of Civil Rights
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>
 - ii. MassDOT Community Relations
 - iii. Community Leaders
 - iv. Brockton Area Transit Authority (BAT)
<http://www.ridebat.com>
 - v. Greater Attleboro Taunton Regional Transit Authority (GATRA)
<http://www.gatra.org/>
 - vi. Public Libraries
<http://www.publiclibraries.com/massachusetts.htm>
 - vii. Schools/Universities
http://en.wikipedia.org/wiki/List_of_colleges_and_universities_in_Massachusetts
 - viii. Chambers of Commerce
<http://masshome.com/cofc.html>
 - ix. Local Legislators
<https://malegislature.gov/Legislators>
 - b. Develop translated version(s) of the notice document or other related announcements, as needed, based on the extent of LEP need and available media sources. If there is a large population of individuals who are LEP in the meeting or project locale, consider translating the meeting notice in full. If LEP needs have not been readily identified, include the single line of text into the languages other than English. Appropriate translation accommodations could include:
 - i. Full translation of the notice into the languages indicated
 - ii. The inclusion of the following statement translated into the appropriate languages into the English language version of the notice:

“This notice describes the date, time, and location of a public meeting or hearing on a transportation project in this area. If you need this notice translated, contact the Old Colony MPO’s Title VI Coordinator at 508-583-1833.”

- iii. Translated versions of print, TV, radio, and online announcements related to the meeting, as applicable.
- c. Consult the following resources for translation needs:
 - i. UMass Translation Center
 - 1. Request Procedure:
<http://www.umasstranslation.com/services/request-an-estimate/>
 - 2. Rates:
<http://www.umasstranslation.com/services/rates/>
 - ii. Statewide Language Services Contract:
 - 1. Search COMMBUYS website <https://www.commbuys.com/bs/> for contract “PRF63” under Contract/ Blanket Description.
 - iii. Local Interpretation Services
- 4. The final dissemination of a public notice should incorporate the following:
 - a. The dissemination of public notice has occurred sufficiently in advance of meeting to ensure adequate processing time for language and accessibility accommodation requests.
 - b. The public notice/ announcement materials have been delivered to non-English language outreach resources and sites, as need is identified in the language access plan’s four factor analysis.
 - c. The public notice has been delivered directly to individuals, organizations, and other stakeholders that represent Title VI populations in the region. Notice may be sent to the entities below with the request that they forward the notice among their own distribution lists and/ or post it.
 - i. The MassDOT Office of Civil Rights
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>
 - ii. MassDOT Community Relations
 - iii. Community Leaders
 - iv. Brockton Area Transit Authority (BAT)
<http://www.ridebat.com>
 - v. Greater Attleboro Taunton Regional Transit Authority (GATRA)
<http://www.gatra.org/>
 - vi. Public Libraries
<http://www.publiclibraries.com/massachusetts.htm>
 - vii. Schools/Universities
http://en.wikipedia.org/wiki/List_of_colleges_and_universities_in_Massachusetts
 - viii. Chambers of Commerce
<http://masshome.com/cofc.html>

- ix. Local Legislators
<https://malegislature.gov/Legislators>

Preparation for the Meeting

1. It is important to consider the following questions:
 - a. Are there civil rights implications in the background/history of the project;
 - b. What public involvement has already been accomplished and did it illuminate civil rights concerns;
 - c. What are the known benefits and burdens of the Old Colony MPO program, service, or activity on Title VI populations? Consult the following resources:
 - i. Public meeting/ hearing transcripts
 - ii. Written public comments
 - iii. Old Colony MPO staff involved in planning and/or conducting prior related meetings
 - iv. Public Meeting demographic surveys
2. Meeting planners should maintain an ongoing dialogue with the individuals and organizations in order to remain well informed on the level of community interest and likely involvement in the public outreach event.
3. The subject matter of transportation-related public engagement can often be based on highly technical studies, project designs that address difficult engineering requirements, multi-faceted long range plans, and other complex documents. In such instances, project managers and meeting planners should create summary documents to present complex information in as simple and clear manner as possible to members of the public who have widely varying backgrounds, including varied education levels. This guidance document produced by the Navy and Marine Corps Public Health Center gives pointers on writing effective executive summaries of highly technical documents http://www.med.navy.mil/sites/nmcphc/Documents/environmental-programs/risk-communication/Appendix_E_AGuideToWritingAnEffectiveExecutiveSummary.pdf. The key points and tips, such as avoiding industry jargon, replacing complex words with simple words, and using acronyms carefully, apply not only to the development of executive summaries, but also the development of documents that effectively convey information to the public.
4. Similarly to #3 above, any spoken presentation of complex topics should be as simple as possible to effectively communicate the subject matter across the varying background of meeting attendees. The guidance document below describes good strategies for presenting technical information to nontechnical audiences [http://www.cedma-europe.org/newsletter%20articles/WorkplaceXpert/Presenting%20Technical%20Information%20to%20Nontechnical%20Audiences%20\(Aug%2008\).pdf](http://www.cedma-europe.org/newsletter%20articles/WorkplaceXpert/Presenting%20Technical%20Information%20to%20Nontechnical%20Audiences%20(Aug%2008).pdf).
5. Ensure that electronic documents related to the subject of the public meeting and intended for public dissemination and review are accessible, in compliance with the Americans with Disabilities Act and Section 508 of The Rehabilitation Act of 1973. Adobe Acrobat Professional and Microsoft Word have built-in “accessibility checkers.” The

following provides instruction on developing accessible documents:

- a. Best practices for text and color contrast considerations when preparing hardcopy and electronic visual aids (such as maps, posters, plans, PowerPoint templates/graphics, charts, graphs, etc.) refer to Lighthouse International <http://69.164.214.107/accessibility/design/accessible-print-design/>
 - b. Creating accessible Word documents: <http://office.microsoft.com/en-us/word-help/creating-accessible-word-documents-HA101999993.aspx>
 - c. Creating accessible Excel workbooks: <http://office.microsoft.com/en-us/excel-help/creating-accessible-excel-workbooks-HA102013545.aspx?CTT=3>
 - d. Creating accessible PowerPoint presentations: <http://office.microsoft.com/en-us/powerpoint-help/creating-accessible-powerpoint-presentations-HA102013555.aspx?CTT=3>
 - e. Creating accessible PDFs with Microsoft Office products through “Tagging”:_ <http://office.microsoft.com/en-us/excel-help/create-accessible-pdfs-HA102478227.aspx?CTT=3>
 - f. General information on accessibility from Adobe: <http://www.adobe.com/accessibility/>
 - g. Adobe Acrobat X Accessibility Guide: <http://www.adobe.com/content/dam/Adobe/en/accessibility/products/acrobat/pdfs/acrobat-x-accessible-pdf-from-word.pdf>
 - h. Video on preparing accessible InDesign files: <http://tv.adobe.com/watch/accessibility-adobe/preparing-indesign-files-for-accessibility/>
6. The period between notice dissemination and the meeting date should be used to identify and arrange accommodations and produce meeting materials in alternate languages and formats (such as large-print), if requested.
- a. Alternate formats can be obtained by contacting:
 - i. Old Colony Title VI Coordinator Pat Ciaramella at 508-583-1833 Extension 202 or information@ocpcrpa.org.
 - b. The nature and extent of accommodations that may be needed can be identified by:
 - i. Direct requests
 - ii. Feedback from community leaders, stakeholders, advocacy groups, etc.
 - iii. The Old Colony MPO Accessible Meeting Checklist (Appendix B)
 - c. Foreign language document translation can be provided by:
 - i. UMass Translation Center
Request Procedure: <http://www.umasstranslation.com/services/request-an-estimate/>
Rates: <http://www.umasstranslation.com/services/rates/>
 - ii. Statewide Language Services Contract: Search COMMBUYS website <https://www.commbuys.com/bsol/> for contract “PRF63” under Contract/Blanket Description.

- d. If unsure how to provide a particular accommodation or for guidance on recommended accommodations, consult:
 - i. The MassDOT Office of Civil Rights
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>
 - ii. The Massachusetts Office on Disability
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/mod/>
 - iii. The Disability Commissions
(<http://www.mass.gov/anf/docs/mod/commission-listing.doc>)
 - iv. The Independent Living Centers
<http://www.masilc.org/membership/cils>
- e. Funding Considerations
 - i. All accommodations must be provided to the public free of charge.
 - ii. For public outreach events which are necessitated by the project development process, each project contains an administration budget that should be utilized, if available.

Meeting Set-Up

1. ADA considerations in public outreach are fully articulated in the Old Colony MPO Accessible Meeting Policy later in this plan. Meeting setup is addressed in the “Accessibility Checklist for Meeting Planners” as included in Appendix B of this plan which should be used to verify the following:
 - a. If the main entrance to the building is not accessible, is the accessible entrance unlocked?
 - b. Are there integrated seating areas for individuals who use a wheeled mobility device in the meeting room? (Practice Tip: Seating areas for individuals with disabilities should not be segregated from the rest of the audience or limited to just one area.)
 - c. Is there seating available for attendees who are deaf or hard of hearing, and have requested an accommodation, near the front of the meeting room so that attendees may see the interpreter/ captioner, or lip read?
 - d. Is the space allotted to sign language interpreters and/ or the CART screen or monitor clearly visible?
 - e. Are the aisles at least three feet wide and clear of obstacles or tripping hazards?
 - f. If microphones are used during the public meeting, are adjustable microphone stands available for attendees? Can staff be used as floaters with microphones as an alternative?
 - g. If the main entrance to the building is not accessible, is there directional signage towards the accessible entrance?

- h. Is the accessible entrance unlocked and able to be used independently? If the meeting is taking place at night, is the path leading to the alternate entrance well lit?
 - i. If a stage or platform will be used during the public meeting, is it accessible?
 - j. If a podium will be used during the public meeting, is the podium height adjustable? If not, is there a small table (between 28 and 34 inches in height) provided to the side of the podium?
 - k. Have assistive devices been tested for full functionality immediately prior to the start of the event?
 - l. Is there directional signage for accessible restrooms and/or emergency exits, if applicable?
2. Title VI considerations can be addressed through the following:
- a. Based on identified language needs, has signage in other languages been posted?
 - b. Is the space allotted to foreign language interpreters clearly visible to the entire audience?
 - c. Has space been given to foreign language interpreters to sit with individuals who need language assistance?
 - d. Have Title VI related materials been made available at the welcome desk and/or in the meeting packet? This should include:
 - i. "I speak" language cards <http://www.lep.gov/ISpeakCards2004.pdf>
 - ii. Translated versions of the written comment form, as applicable
 - iii. Demographics survey

During the Meeting

1. At the official start of the meeting, make the following statements. If a foreign language translator(s) is present, instruct them to repeat. (Insert language here, address: general statement regarding nondiscrimination and availability of language and accessibility accommodations, including assistance in providing written comments).
 - a. Include instructions on site-specific accessibility considerations, such as accessible emergency exits.
2. The Old Colony MPO is required to "demonstrate explicit consideration and response to public input" (23 CFR 450.316). During a public outreach event, this requires affording attendees with opportunities to voice comments, questions, and concerns and provide an adequate response at the event or by following up in writing or at subsequent public outreach opportunities.

Post Meeting

1. All public comments (written and oral), testimonials, and sentiments expressed during the public outreach event have been gathered/documentated by Old Colony MPO staff that attended the meeting and passed on to the designee:
2. Once received, the designee catalogues all public comments. Every person who sends a comment to the Old Colony MPO or to Old Colony MPO staff will receive a response

- indicating that the comment has been received and the comment will be forwarded to the MPO members.
3. The OCPC staff for the MPO is responsible for coordinating responses to public comments because direct impacts require direct communication. 23 CFR 450.316
 - a. Methods of responses may include:
 - i. Individualized written responses
 - ii. General distribution written statements (web, email, newsletter, newspaper, etc.)
 - iii. Postings to project specific website, if available
 - iv. In-person or telephonic follow-ups with individuals/organizations regarding the topics of discussion at the public outreach event
 - b. The Old Colony MPO staff reviews the public comments to determine which Old Colony MPO program areas should be consulted with or assigned the responsibility of drafting a response that “demonstrate[s] explicit consideration... to public input” (23 CFR 450.316)
 - c. The Old Colony MPO staff should prepare a summary grid for the Old Colony MPO compiling the list of comments and notation on the responses that are made/proposed to make
 - i. This may be in the form of a table that contains who made the comment, summary of the comment itself, whether there was a change and if not, what was the response.
 - ii. If comments refer to or implicate adverse or disproportionate impacts or limited access to the process by any person protected under Title VI and the non-discrimination statutes, these comments should be forwarded using the Old Colony MPO’s outreach database to solicit further comment on the issue raised. Public Comment should be sought on these comment(s) for a minimum of an additional seven (7) day period by the Old Colony MPO and should be specifically referenced in the summary grid and a response made as required by this section.
 4. In instances where the Old Colony MPO will draft a written response to a public comment, the content of the response itself can “demonstrate explicit consideration” by:
 - a. Describing changes to the recommended design prompted/ requested by the comment and how they will be considered
 - b. Describing alternate designs prompted/ requested by the comment and how they will be considered
 - c. Describing mitigation measures prompted/ requested by the comment and how they will be considered
 - d. Describing the Old Colony MPO program areas that were consulted in formulating the response
 - e. Noting whether the comment is novel or previously encountered
 - f. Noting whether the comment has been received from a multitude of sources
 5. Responses should also contain:

- a. Contact information for additional information and follow-up
 - b. Notice of upcoming related public engagement opportunities
6. If significant changes are made to the Regional Transportation Plan, the Transportation Improvement Plan, or the Unified Planning Work Program in response to a public comment, a minimum of an additional seven (7) day comment period shall be allowed to solicit public comment on that significant change.

TARGETED OUTREACH GATHERINGS (SMALL GROUP MEETINGS/ COMMITTEES/ TASK FORCES/ STUDIES)

Strategic Planning for Title VI Group and Individual Inclusion

Strategic planning for the involvement of Title VI community members on special purpose meeting groups or committees is essential to an inclusive and successful effort.

Preliminary Steps:

1. Identify and analyze the location affected by the project or initiative at issue to determine the Title VI populations in the area.
2. Establish a clear objective and role for the envisioned targeted group, including the nature of community involvement and particular skills which may be needed for fruitful discussion or deliberations.
3. Create an outline or public participation matrix to identify the different types of community representation and interests that reflect the community affected by a project or initiative with careful attention to Title VI populations. Types of organizations or interests that may include representatives of Title VI populations:
 - a. transit-dependent community
 - b. affected businesses
 - c. civic organizations (women, seniors, youth, people with disabilities)
 - d. freight interests
 - e. the disability community
 - f. neighborhood association
 - g. schools
 - h. places of worship

Beyond demographic data and identification of the types of Title VI related groups or individuals in the community, there are certain key questions to help define the individuals or groups to invite. Consider meeting with a small group of internal staff and/ or managers from among Old Colony MPO departments who know the community and who can help answer these key questions:

1. Who can represent these diverse groups and constituencies in a credible and responsible way?

2. Who needs to be at the table for the work to be accomplished?
3. What is the history of relationships between stakeholder representatives and groups? Is there any past tension that may be a deterrent to participation? If so, are there other community leaders who could help mediate to encourage participation despite differences?
4. If known from past experience, are there stakeholders critical to the process who may be reluctant to participate? How can this reluctance be alleviated? What would be the impact of their refusal to participate in the process? Is there an alternative to their participation?
5. What commitments do you want from participants?
6. Other than known stakeholders, what other individuals or groups could have an interest in the project that are not in the immediate project area, and/ or are not otherwise represented in the outreach strategy?
7. Do any necessary parties have possible concerns about participating? How can those concerns be alleviated?

Consult Statewide Resources

State resources include the following:

1. Massachusetts Department of Transportation - Office of Civil Rights
10 Park Plaza
Boston, MA 02116
Phone: 857-368-8580
Fax: 857-368-0602
Email: MASSDOT.CivilRights@state.ma.us
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>
2. Executive Office of Administration and Finance - Office of Diversity and Equal Opportunity
One Ashburton Place, Room 213
Boston, MA 02108
Phone: (617) 727-7441
Fax: (617) 878-9830
E-mail: Sandra.Borders@state.ma.us
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/hrd/office-of-diversity-and-equal-opportunity.html>
3. Massachusetts Office on Disability
One Ashburton Place #1305
Boston, MA 02108
(617) 727-7440 or (800) 322-2020 toll free (both V/TTY)
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/mod/>

Conduct Targeted Research

Research the communities involved and the groups and individuals who have been identified.

If a meeting planner is not aware of the racial, ethnic or national origin background of the individual or group being engaged, it is similarly possible to research Title VI groups individually, using query strings to the group or individuals and Massachusetts, the regional area or the locality where the group or individual is based. This information is useful in gaining a basic understanding of traditions, values, beliefs, holidays and relationship to government and/ or transportation which may impact participation.

Reaching out to Potential Title VI Group Members – Anticipating Potential Obstacles to Participation

1. Outreach approaches:
 - a. Look for formal and informal opportunities to engage, collaborate, and build relationships, including calls of introduction made by volunteers who are trusted in the community.
 - b. Use multiple outreach methods
 - c. Tailor materials to the audience, including translations
 - d. Identify existing channels of communication through communities
 - e. Experiment and reflect on the effectiveness of new approaches

In Title VI communities, a range of factors lead to reluctance to participate for individuals and groups that could be helpful in a transportation planning or development process. For example, many times natural leaders are either the heads or well-placed leaders of agencies or community groups; this limits their ability to participate because there are many demands on their time, resources and commitment.

2. Identify the factors that would encourage participation and involvement before reaching out, to be in the best position to explain how it is important for this individual or group to participate. If there is a possibility of grant funding to support participating groups, this can certainly provide an incentive for participation.
3. The following are some common barriers to participation, and reasonable responses that a meeting planner should anticipate, understand and be able to articulate to encourage potential participants to get involved:
 - a. Limited English language skills and/ or limited literacy – it is first important to know that the Old Colony MPO has the ability and obligation to fund translation and interpretation support and to convey this message. It would be ideal to have a colleague or staff person who speaks the language or is of the culture in question to support the outreach effort, or to use a translator as an intermediary.
 - b. Lack of trust due to past experiences - it is important to be in a position to respond with as much information as will demonstrate that both participation and the project are being honestly and openly addressed.
 - c. Lack of experience with transportation decision making processes – if this process

is not well understood or the meeting convener has a difficult time explaining the process, it is important to have OCPC staff explain the process.

- d. Economic barriers – transportation costs, work schedules – meetings should be sited in the community to avoid cost factors, and they should be timed to meet the schedule of the majority of participants, after due consideration of all schedules, suggested alternatives and needs.
 - e. Cultural barriers – there may be intergroup dynamics that make bringing groups together problematic due to class, racial ethnic or political differences. Early research will help build understanding of this possibility, and suggest whether a mediated way of bringing the groups together is an option, or if there is a need to have separate meetings.
- f. Common barriers – time, other demands. The key to this element is making sure that the importance of an effort is clear and well stated to the candidate, including the benefit to an individual or group representative being recruited.

Responding to a Refusal to Participate from a Potential Title VI Participant

1. If a person or group declines to participate in a particular effort, consider that the group may wish to participate on another occasion.
2. Consider sending the individual or organizations updates on the effort that are sent to others. This effort could be informative and demonstrate a good faith effort to be inclusive.

Documenting the Effort to Achieve Diversity and Next Steps

While it may not be possible to achieve a perfectly diverse committee for purposes of transportation planning, it is still important to document efforts made for outreach for Title VI inclusion purposes.

These steps may include the following:

1. The meeting planner should keep a file on available resources and methods used to identify individuals and groups, the nature of the outreach effort, the people invited and the results of a recruitment effort. Possible resources:
 - a. Lists of potential invitees who were considered and/ or accepted
 - b. Samples of research conducted and/or consultations made for recruitment
 - c. Copies of invitation e-mails or other correspondence
 - d. Group membership lists, with indications of the Title VI communities represented
 - e. Meeting sign in sheets
 - f. Correspondence from invited individuals
2. Meeting planners should plan to discuss with the members of the group that is ultimately recruited the efforts made to reach out and recruit individuals, including the potential need that may remain after the fact for additional participation by certain Title VI group

members or related organizations.

3. Effective management of the group that is ultimately formed is fundamental to the productivity and longevity of relationships with Title VI community members. Following through with stakeholders to demonstrate that input was considered and/ or had an impact on project parameters, study outcomes, and planned activities can demonstrate to participants the value added to their interests and communities through continued involvement in these activities.

OPEN HOUSES

Title VI Considerations

1. "I Speak" language cards have been provided at the welcome desk.
<http://www.lep.gov/ISpeakCards2004.pdf>
2. If the Old Colony MPO is providing interpretive services at the public meeting/hearing session, then they should also be available during the open house session and their availability should be made clear through signage and/ or announcements. After the session, the Old Colony MPO staff in attendance should relay the nature of questions and concerns identified through interaction with the public to the Old Colony MPO (or designee). It is important for the Old Colony MPO staff working on all stages of project development to know community concerns. Written descriptions of items on display may need to be translated depending on requests received and/ or the anticipated level of LEP participation.

ADA Considerations

1. The open house should be set up in an ADA compliant manner. Please see the Old Colony MPO Accessible Meeting Policy later in this plan.
2. Consider the following when setting up the open house venue:
 - i. Consult the following guide on best practices for text and color contrast considerations when preparing hardcopy and electronic visual aids (such as maps, posters, plans, PowerPoint templates/ graphics, charts, graphs, etc.)
Please refer to Lighthouse International for more information:
<http://69.164.214.107/accessibility/design/accessible-print-design/>
 - ii. Pathways that guide attendees to display materials or the Old Colony MPO staff and consultants should be clear of obstructions.
 - iii. Proper heights and viewing angles of display materials to make them accessible.
 - iv. Horizontal surfaces used for display should be at a height accessible to individuals that are short of stature and/ or rely on assistive mobility devices.
 - v. Similarly, materials displayed vertically should not be at an excessive height or at an angle that makes them difficult to view.
3. The Old Colony MPO staff and consultants should be prepared to describe displays to

blind or visually impaired attendees.

4. Alternate versions, (large print, etc.) of public documents (such as informational packets) should be available if requested with sufficient lead time prior to the date of the meeting.

ONE-ON-ONE INTERACTIONS

Communicating with Individuals with Limited English Proficiency (LEP)

If a member of the public is attempting to interact but there is a language barrier, the following procedures are recommended.

1. In-person (such as the Old Colony MPO reception areas, etc.)
 - a. The first step is to identify the preferred language of the individual. The following resources are available:
 - i. "I Speak" cards, <http://www.lep.gov/ISpeakCards2004.pdf>
 - ii. Google Translate (<http://translate.google.com/>) or a similar real-time free online language translator can be used to identify the language. If the member of the public is directed to type on the webpage in a language other than English, the software can "Auto-Detect" which language is being used and provide real-time translations. Assistance from co-workers in your unit that may be able to identify the language.
 - iii. Language Line (<https://www.language.com/>)
 - b. Once the language has been identified, the methods used to address the needs of the individual will change depending on the circumstances.
 - i. Simple inquiries may be addressed informally on-the-spot with the aid of multi-lingual staff or Google Translate (<http://translate.google.com/>) or a similar product. (Example: providing directions around the building/ office to an LEP individual.

An employee and an LEP individual may type or speak into Google Translate software and to carry out a rudimentary conversation.
This should remain limited to incidental interactions.
 - ii. More complex issues may require professional translators/ interpreters. Complex issues are those that affect the legal rights of the individual and therefore depend on the accuracy of translations/ interpretations. The following services are available in those instances:

Language Line (<https://www.language.com/>)
Statewide Language Services Contract
Search COMMBUYS website <https://www.commbuys.com/bsol/>
for contract "PRF63" under Contract/ Blanket Description.
 - iii. Should time be needed to secure professional language services (such as scheduling a meeting with an interpreter or sending out documents to be translated), it should be communicated with the help of Google translate

or translated cards of key phrases staff may have for this issue.

2. Electronically (includes email, website comment form, etc.).
 - a. For correspondence in a language other than English, Google Translate may be used (<http://translate.google.com/>)
 - b. More complex issues may require professional translators/interpreters referenced above.

Communicating with People with Disabilities

1. Outlined below are tips to help you in communicating with persons with disabilities.
 - a. General Tips:
 - i. When introduced to a person with a disability, it is appropriate to offer to shake hands. People with limited hand use or who wear an artificial limb can usually shake hands. (Shaking hands with the left hand is an acceptable greeting).
 - ii. If you offer assistance, wait until the offer is accepted. Then listen to or ask for instructions.
 - iii. Relax. Do not be embarrassed if you happen to use common expressions such as "See you later," or "Did you hear about that?" that seem to relate to a person's disability.
 - iv. Do not be afraid to ask questions when you're unsure of what to do.
 - b. Tips for Communicating with Individuals who are Blind or Visually Impaired:
 - i. Speak to the individual when you approach him or her.
 - ii. State clearly who you are; speak in a normal tone of voice.
 - iii. When conversing in a group, remember to identify yourself and the person to whom you are speaking.
 - iv. Never touch or distract a service dog without first asking the owner.
 - v. Tell the individual when you are leaving.
 - vi. Do not attempt to lead the individual without first asking; allow the person to hold your arm and control her or his own movements.
 - vii. Be descriptive when giving directions; verbally give the person information that is visually obvious to individuals who can see. For example, if you are approaching steps, mention how many steps.
 - viii. If you are offering a seat, gently place the individual's hand on the back or arm of the chair so that the person can locate the seat.
 - b. Tips for Communicating with Individuals who are Deaf or Hard of Hearing:
 - i. Gain the person's attention before starting a conversation (i.e., tap the person gently on the shoulder or arm).
 - ii. Look directly at the individual, face the light, speak clearly, in a normal

tone of voice, and keep your hands away from your face. Use short, simple sentences.

- iii. If the individual uses a sign language interpreter, speak directly to the person, not the interpreter.
 - iv. If you telephone an individual who is hard of hearing, let the phone ring longer than usual. Speak clearly and be prepared to repeat the reason for the call and who you are.
- c. Tips for Communicating with Individuals with Mobility Impairments:
- i. If possible, put yourself at the wheelchair user's eye level.
 - ii. Do not lean on a wheelchair or any other assistive device.
 - iii. Never patronize people who use wheelchairs by patting them on the head or shoulder.
 - iv. Do not assume the individual wants to be pushed; ask first.
 - v. Offer assistance if the individual appears to be having difficulty opening a door.
 - vi. If you telephone the individual, allow the phone to ring longer than usual to allow extra time for the person to reach the telephone.
- d. Tips for Communicating with Individuals with Speech Impairments:
- i. If you do not understand something the individual says, do not pretend that you do. Ask the individual to repeat what he or she said and then repeat it back.
 - ii. Be patient. Take as much time as necessary.
 - iii. Concentrate on what the individual is saying.
 - iv. Do not speak for the individual or attempt to finish her or his sentences.
 - v. If you are having difficulty understanding the individual, consider writing as an alternative means of communicating, but first ask the individual if this is acceptable.
- e. Tips for Communicating with Individuals with Cognitive Disabilities:
- i. If you are in a public area with many distractions, consider moving to a quiet or private location.
 - ii. Offer assistance completing forms or understanding written instructions and provide extra time for decision-making. Wait for the individual to accept the offer of assistance; do not "over-assist" or be patronizing.
 - iii. Be patient, flexible and supportive. Take time to understand the individual and make sure the individual understands you.
2. Additional information can be provided by:
- a. MassDOT Office of Civil Rights
<http://www.massdot.state.ma.us/OfficeofCivilRights.aspx>

- b. MBTA System Wide Accessibility
http://www.mbta.com/riding_the_t/accessible_services/default.asp?id=16901
- c. Massachusetts Office on Disability
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/mod/>
- d. Commonwealth of Massachusetts - Office of Diversity and Equal Opportunity
<http://www.mass.gov/anf/employment-equal-access-disability/oversight-agencies/hrd/office-of-diversity-and-equal-opportunity.html>

The Old Colony MPO Accessible Meeting Policy

PURPOSE

This policy outlines criteria that must be fulfilled in order to ensure that all the Old Colony MPO public meetings are fully accessible to persons with disabilities. This document will also address issues related to attendees with limited English proficiency.

The ability to access and participate in state government, including participating in public meetings, is a fundamental right protected by both State and Federal law. The Massachusetts Public Accommodation Law and the Americans with Disabilities Act mandate that persons with disabilities must not be denied participation in public meetings, and that reasonable accommodation requests made by attendees shall be honored. For these reasons, when planning and executing public meetings, the Old Colony MPO personnel must ensure that all aspects of the meeting are accessible to persons with disabilities.

Under Title VI of the Civil Rights Act of 1964 and Commonwealth Executive Order 526, the Old Colony MPO must also ensure that programs and activities do not discriminate based on race, color or national origin, age, disability and sex, among other protected categories. A public participation plan is being developed for Title VI purposes, which should be consulted by meeting planners in coordination with this Accessible Meeting Policy to ensure that the Old Colony MPO includes Title VI constituencies in transportation programs and activities. The method for determining whether and/ or what non-English languages need to be translated or interpreted is called a “four factor analysis.” Essentially, to determine whether translation is needed, meeting planners must analyze the number of limited English proficiency persons (LEP) by language group where a meeting will be held, the frequency of contacts with the program, the importance of the program and cost factors.

This document will provide guidelines for ensuring the accessibility of public meetings hosted by the Old Colony MPO. Components such as the meeting location, room setup, alternate formats and translations of handouts, and the requirement to provide CART and/ or sign language and/ or foreign language interpreters upon request will be discussed.

Definitions of terms used in this policy are available in Appendix D of this plan.

SCOPE

All public meetings hosted by, or on behalf of, the Old Colony MPO.

RESPONSIBILITIES

It is the responsibility of the Old Colony MPO staff charged with the coordination of the public meeting to ensure that the public meeting is accessible to all. The local contacts for the meeting

facility, in conjunction with the responsible Old Colony MPO staff, are responsible for filling out the “Accessibility Checklist for Meeting Planners” in Appendix B to ensure the space is accessible prior to the meeting.

POLICY

General Considerations

1. Public meeting planners shall identify at least one person who is responsible for making sure that the public meeting is accessible for all attendees. This individual shall serve as the contact for attendees requesting reasonable accommodations. See the appendix for a Checklist for Meeting Planners.
2. Public meetings should be planned and publicized as early as possible - ideally, 21 calendar days, but no less than 14 days in advance. Revised agendas shall be posted no less than 48 hours in advance of a public meeting.
3. Meeting notices should include a date by which attendees should request reasonable accommodations - typically ten days before the meeting.

Note: After the cutoff date, staff must still try to provide an accommodation but should not guarantee the provision of the requested accommodation. Attendees shall not be charged for any reasonable accommodation provided.

Choosing a Location

1. Access to Nearby Transportation. All public meetings should be within ¼ mile of an accessible bus stop or rail station, where feasible. For meeting locations not located on fixed route transit service, potential participants should be made aware of the door-to-door paratransit service offered by BAT or GATRA. If neither of these criteria is possible given unique geographic or temporal challenges, has every reasonable attempt been made to allow interested parties to attend the meeting through alternative means?
 - a. The path of travel from the transit stop to the meeting location shall be accessible. Specifically, it should be:
 - i. At least three feet wide
 - ii. Unobstructed (not blocked by trash cans, light poles, etc.)
 - iii. Free of steps, drop-offs or curbs
2. Parking. If parking is available to meeting attendees, meeting planners shall ensure that the number of accessible parking spaces available complies with state and Federal regulations.
 - a. The path of travel from the accessible parking to the meeting location shall be accessible. Specifically, it shall be:
 - i. At least three feet wide
 - ii. Unobstructed (no trash cans, light poles, etc.)

- iii. Free of steps, drop-offs or curbs
- 3. Identifying the Accessible Entrance. If the main entrance to the building (in which the public meeting is being held) is not the accessible entrance, a sign containing the universal symbol of accessibility with an arrow appropriately pointing to the accessible entrance shall be posted at the main entrance.
- 4. Ensure the alternate accessible entrance is unlocked and available to be used independently and that the path of travel to the alternate entrance is well lit (if the meeting is taking place at night). If the door is locked and intercom service or another format is used to gain access, an attendant must be at the door to accommodate deaf or hard of hearing individuals, as well as others with disabilities.
- 5. Accessible Restrooms. If restrooms are available for use by the public then all public meetings shall have at least one accessible restroom for men and one accessible restroom for women, or one accessible gender neutral restroom.
 - a. The accessible restrooms shall be within reasonable proximity to the meeting room.
- 6. Accessible Telephones. If two or more public payphones are available at the meeting facility, at least one should be:
 - a. Equipped with TTY
 - b. Mounted no higher than 48" from the floor and provide clear floor space 30" wide and 48" wide (so that attendees using wheeled mobility can properly access the phone).
- 7. The Meeting Room: The meeting room in which the public meeting will take place shall be made accessible for persons with disabilities. The following shall be provided:
 - a. An integrated seating area for wheeled mobility device users shall be made available.
 - b. If possible, meeting planners should remove several chairs to accommodate potential attendees who use wheeled mobility devices.
 - i. If possible, remove a chair to the side and to the rear of the designated space to ensure enough room for the wheeled mobility device.
 - ii. Such spaces for wheeled mobility device users shall be dispersed throughout the room, and not clustered all in one section (e.g. all in the front or all in the back). This allows attendees using wheeled mobility a variety of seating/viewing options.
- 8. Space for Sign Language, CART and Foreign Language Interpreters
 - a. A well-lit area and chairs facing the audience shall be made available for sign language interpreters at the front of the room (likely just off to one side of the main presentation area). If a CART provider is to be used, a small table for the laptop and space for a screen and projector should be provided near an electrical outlet.
 - b. Priority seating at the front of the audience and in direct line of sight of the interpreters/CART provider shall be provided for attendees who are deaf/hard of hearing.

- c. For foreign language interpreters, there is a need for space where they can sit with the individuals who require language assistance.
- 9. Aisles within the meeting room shall be
 - a. Clear of tripping hazards (e.g. electric cords) to the greatest extent possible. Where cords or other obstacles must cross an aisle to power communications or other device, the hazard should be minimized with tape or other appropriate means.
 - b. At least 3 feet wide.
- 10. Microphones. The microphones used at public meetings shall be available on a stand that is adjustable in height.

Note: While wireless microphones have become popular, some attendees with disabilities will not be able to hold a microphone independently. In this situation, allowing an attendee use of a microphone stand adjusted to their height is almost always preferable to holding the microphone for them. Alternatively, and particularly for larger meetings, staff with a floating microphone would be preferable to facilitate communication.
- 11. Podiums. If any attendee may have an opportunity to speak at a podium, meeting planners shall ensure that either:
 - a. The podium is height adjustable, or a small table is provided to the side of the podium.
 - b. If a microphone is provided at the podium, one shall also be provided at the small table.
- 12. Raised Platforms. If any attendee may have an opportunity to move onto a raised platform or stage during the meeting, the raised platform or stage shall be accessible by:
 - a. A ramp that is at least 3 feet wide, and/or has a platform lift.
- 13. High Speed Internet Connection. Public meeting rooms shall provide for a high speed internet connection to allow attendees who rely on video remote interpreting or CART. There should also be a conference capable telephone with a speakerphone function available.

American Sign Language and Foreign Language Interpreters, Assistive Listening Devices, CART and Video Remote Interpreting

- 1. American Sign Language and/ or foreign language interpreters shall be provided at all public meetings upon request provided request is made to the Title VI Coordinator at least 10 days prior to the date of the meeting.
 - a. To ensure their availability, interpreters should be requested at 10 days in advance of the public meeting.
 - b. Meeting attendees will not be charged for costs associated with sign language or foreign language interpretation.
- 2. Assistive Listening Devices. Assistive Listening Devices for attendees who are hard of hearing shall be provided at all public meetings upon request.

3. CART services shall be provided at all public meetings upon request (See Attachment 6.6 for information on how to provide CART services.). Staff should schedule or make requests for CART services at least two weeks in advance of the meeting, and preferably as soon as an attendee makes this need known. When remote CART services are to be used (the CART reporter is not in the room), staff should try to provide the reporter any technical terms or acronyms to be used, as well as the names of key meeting attendees before the meeting date.
4. Video Remote Interpreting shall be provided at all public meetings upon request via a computer/ laptop with a webcam and high speed internet connection.

Note: Video Remote Interpreting is a relatively new form of technology and may be an adequate alternative to providing ASL interpreters in certain situations. However, if an attendee requests Video Remote Interpreting, ASL interpreters will be an adequate substitute, if the meeting planner cannot secure the requested technology.

Alternative Formats and Translation of Handouts/Presentation Material

These requirements are the same with respect to translation into foreign languages, where the language requested is identified through application of the four factor analysis process, set forth in the Old Colony MPO Title VI Language Assistance Plan. When a language group is small, defined as 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered, foreign language translations of "vital documents" should be provided, and non-vital documents may be orally translated. This requirement does not affect the requirement to provide meaningful translation to one or more in a small group of LEP individuals through competent oral interpreters or translation where language services are needed and are reasonable.

Large Print Version

If requested to the Old Colony Title VI Coordinator at least 24 hours before the meeting, any text-based printed material to be handed out during the meeting shall be made available in large print.

Large print meeting materials shall:

1. Be created using "Arial" font with a font size of 16 pt.
2. Have the same information as the original handout.
3. Have the highest contrast possible (e.g. black on white).
4. If graphics (such as images, tables, or graphs) are used in the original document, the same graphics shall be included in the large print version of the document.
 - a. If graphics are used in the large print document, a brief description of the image shall be provided. Image descriptions shall be brief and provide the viewer of the document with a general idea of what is in the image.

- b. If tables or graphs are used in the large print document, a summary of the table or graph shall be provided.

Braille Version

If a Braille version of materials is requested to the Old Colony MPO Title VI coordinator at least 10 days in advance of the meeting, this version shall be available for the meeting, if no advance request is made but rather is requested at or after the meeting, then Meeting materials shall be made available in Braille within 14 calendar days of the request.

Foreign Language Version

If a common foreign language version of materials is requested to the Old Colony MPO Title VI Coordinator at least 10 days in advance of the meeting, this version shall be available for the meeting, if no advance request is made but rather is requested at or after the meeting, then Meeting materials shall be made available in the language requested within 14 calendar days of the request.

Other requests for alternate formats

Individual attendees may have unique specifications for alternate formats. Best efforts will be made to honor all reasonable requests.

Meeting attendees will not be charged for any cost affiliated with the creation of alternate formats of meeting material.

Publicizing the Meeting

Public meetings shall be publicized as early as possible, ideally 21 calendar days in advance, but not less than 14 calendar days in advance. This allows attendees time to submit requests for reasonable accommodations and for meeting planners to set deadlines for accommodation requests to be made in a timely manner. The meeting publicity also needs to be translated into the languages that are identified through application of the four factor analysis set forth in the Old Colony MPO Title VI Language Assistance Plan.

All meeting notices shall include:

1. The statement "This location is accessible to persons with disabilities"
2. A brief listing of accessibility features that either are available or may be made available upon request during the public meeting (e.g. sign language, CART, assistive listening devices and/ or foreign language interpreters).
3. Information on how to request reasonable accommodations by phone, e-mail or fax and the deadline for requests.
4. Information on how to request foreign language interpreter assistance.
5. See Attachment for a sample meeting posting.

Additional Considerations

1. Within 48 hours, meeting planners shall follow-up with attendees who have requested reasonable accommodations to let them know their request has been received and will be honored to the extent possible.

Note: Especially in the case of ASL interpreters, the meeting planner may not know of their availability until 24 hours prior to the meeting. It is reasonable to let people know their request has been received and that it is in the process of being put in place, however if no interpreter is available people need to be notified and alternate plans must be made, such as CART or Video Relay.

2. When opening a public meeting, presenters shall announce
 - a. The presence and function of sign language interpreters (if interpreters are in the room), and/ or CART providers
 - b. That assistive listening equipment is available
 - c. The location of accessible restrooms
3. When presenting, presenters at public meetings shall:
 - a. Speak slowly and clearly so that the sign language interpreters have time to interpret.
 - b. Verbally describe information presented visually (e.g. PowerPoint) so that attendees with visual impairments can access the information.
 - c. Ensure that any videos/ DVDs shown during the meeting are encoded with closed captioning and are shown on a closed caption compatible device. Subtitles are an acceptable alternative.

Ensuring adequate accessible parking

1. See <http://www.mass.gov/eopss/docs/dps/aab-regs/521023.pdf> for Massachusetts Architectural Access Board (MAAB) regulations
2. See <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba-standards/chapter-5-parking> for Americans with Disabilities Act Architectural Guidelines (ADAAG)

Accessible Restrooms

1. See <http://www.mass.gov/eopss/docs/dps/aab-regs/521030.pdf> for Massachusetts Architectural Access Board (MAAB) regulations
2. See <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba->

[standards?highlight=WyJ0b2lsZXQiLCJ0b2lsZXRzliwidG9pbGV0aW5nIlQ=](#) for Americans with Disabilities Act Architectural Guidelines (ADAAG)

Sign Language Interpreters

How to request sign language, CART Providers or foreign language interpreters:

1. Complete and submit an on-line request for interpreting services through the Massachusetts Commission for the Deaf and Hard of Hearing's (MCDHH) website
 - a. Go to <http://mass.gov/mcdhh>
 - b. Click on "Request an Interpreter" or "Request a CART Provider"
2. Requests should also be submitted to the Old Colony MPO's Title VI Coordinator no later than 10 calendar days in advance of the meeting to ensure interpreter availability.
3. If the meeting is cancelled or rescheduled, interpreter requests must be canceled at least 48 hours advance in order to avoid being billed for the service. CART providers must be cancelled no later than 72 hours in advance of the event.
4. Interpreters' invoices are billed as a minimum of two hours.
5. For meetings that are anticipated to last more than 75 minutes, two interpreters shall be provided. In most situations, one CART provider is sufficient if the meeting is no longer than three hours.

CART Providers

How to reserve CART (Communication Access Real-time Translation) providers:

1. Complete and submit an on-line request for interpreting services through the Massachusetts Commission for the Deaf and Hard of Hearing's (MCDHH) website
2. Go to <http://mass.gov/mcdhh>
3. Click on "Request an Interpreter" or "Request a CART Provider"
4. Click on "Online request" and follow listed directions

Foreign Language Interpreters/Translators

The Old Colony MPO's policy combines the use of bilingual staff, interpreter services and translated materials to communicate effectively with persons who are not fluent in English. When a request for oral interpretation is made, or a significant language speaking population is expected to attend a public meeting, the following steps should be reviewed and carried out to ensure compliance with Title VI requirements.

1. Conduct a four-factor analysis as to the kind of meeting in question and the populations that are in the affected communities, using the language group maps that are contained in the Language Assistance Plan.
2. Identify the languages that are likely to be needed and consult with the MA Office of

Diversity and Civil Rights Title VI Coordinator and/or Specialist for assistance with any problems concerning the language groups that may require interpreter services.

3. Identify the source for interpreter services, recognizing that most providers require one-two weeks advance notice of a meeting, based on the language(s) to be interpreted.

Request and cancellation timeframes

1. Requests should be submitted at least 10 calendar days in advance of the meeting to ensure interpreter availability
2. If the meeting is cancelled or rescheduled, interpreter requests must be canceled at least 48 hours advance in order to avoid being billed for the service
3. Interpreter invoices vary by provider but may have a minimum of two to three hours.
4. For meetings that are anticipated to last more than 75 minutes, two interpreters shall be provided.

How to reserve assistive listening devices

To reserve an assistive listening device contact the Old Colony Planning Council at 508-583-1833 Extension 202. For accommodation or language assistance, please contact MassDOT's Chief Diversity and Civil Rights Officer by phone (857-368-8580), fax (857-368-0602), TTD/TTY (857-368-0603) or by email MASSDOT.CivilRights@dot.state.ma.us.

List of Appendices

Appendix A: Title VI Maps

Appendix B: Accessibility Checklist for Meeting Planners

Appendix C: Sample Meeting Posting

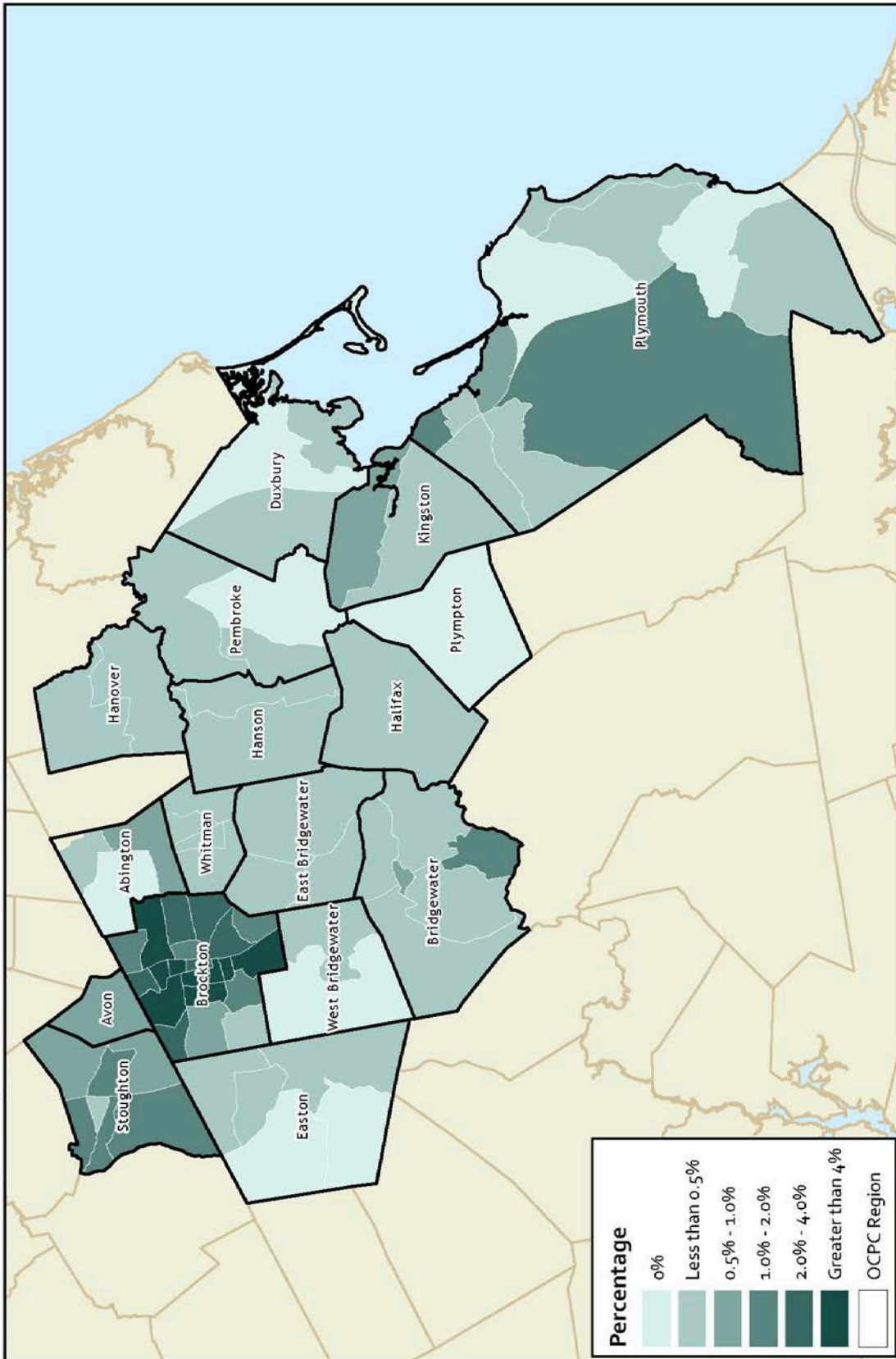
Appendix D: Definitions

Appendix A: Title VI Maps



Limited English Proficiency

Individuals who Speak English Less than Very Well



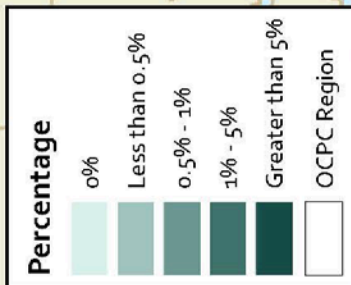
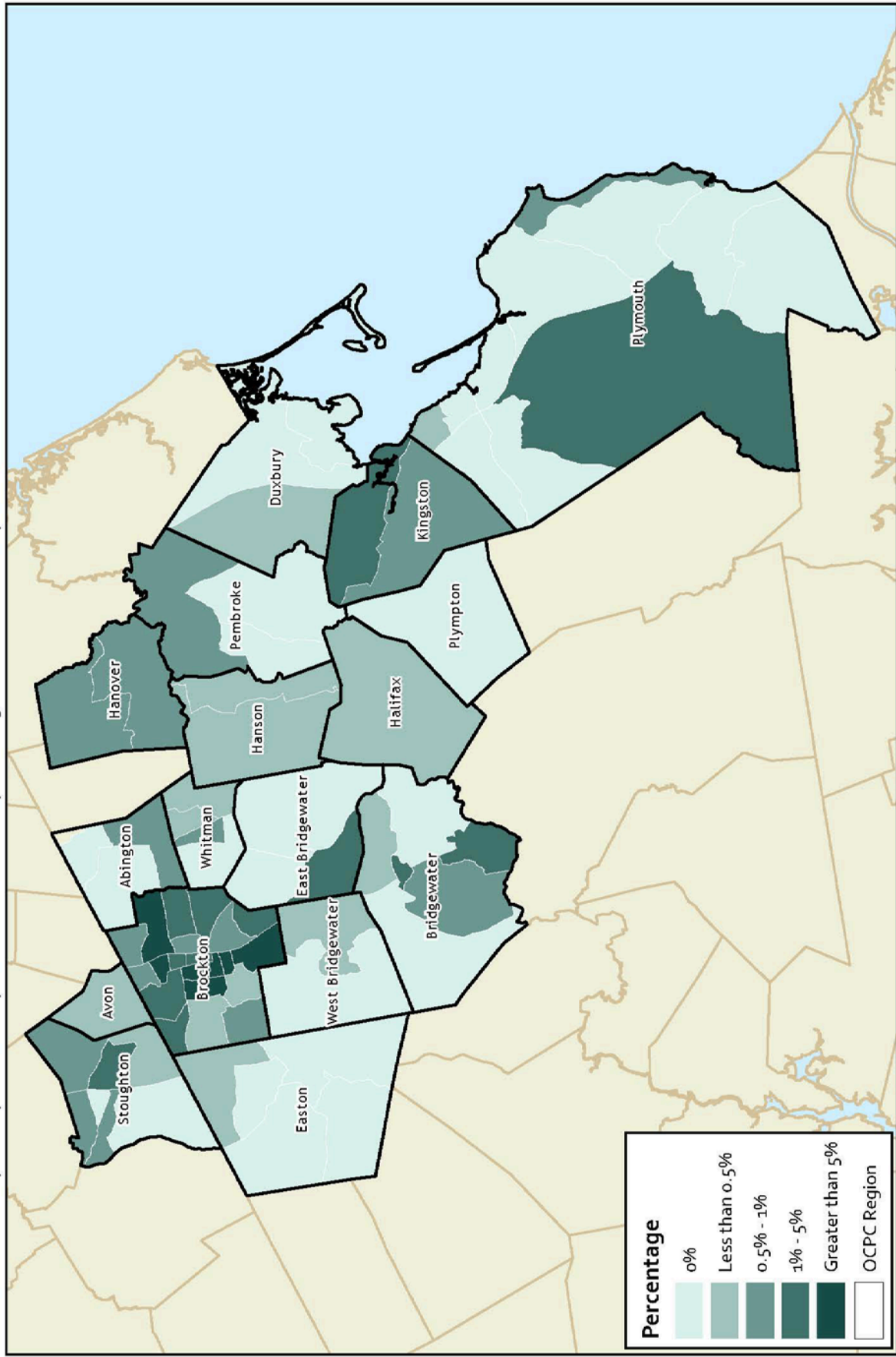
Old Colony Planning Council 70 School Street, Brockton, MA 02301
 Data Sources: US Census, Office of Geographic Information (MassGIS), OCPC





Limited English Proficiency

Individuals who speak Spanish or Spanish Creole and Speak English Less than Very Well



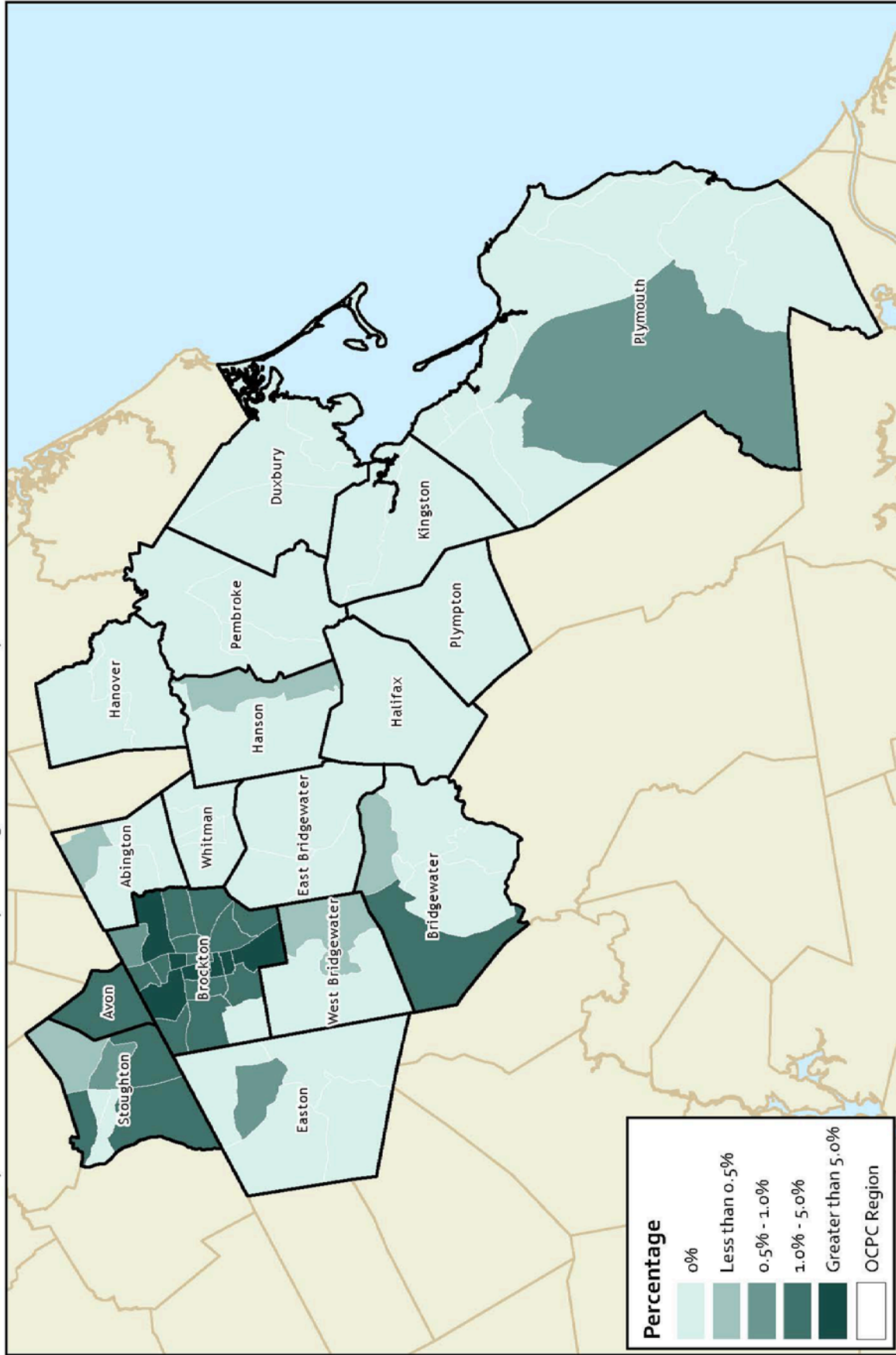
Old Colony Planning Council 70 School Street, Brockton, MA 02301
Data Sources: US Census, Office of Geographic Information (MassGIS), OCPC





Limited English Proficiency

Individuals who speak Haitian Creole and Speak English Less than Very Well



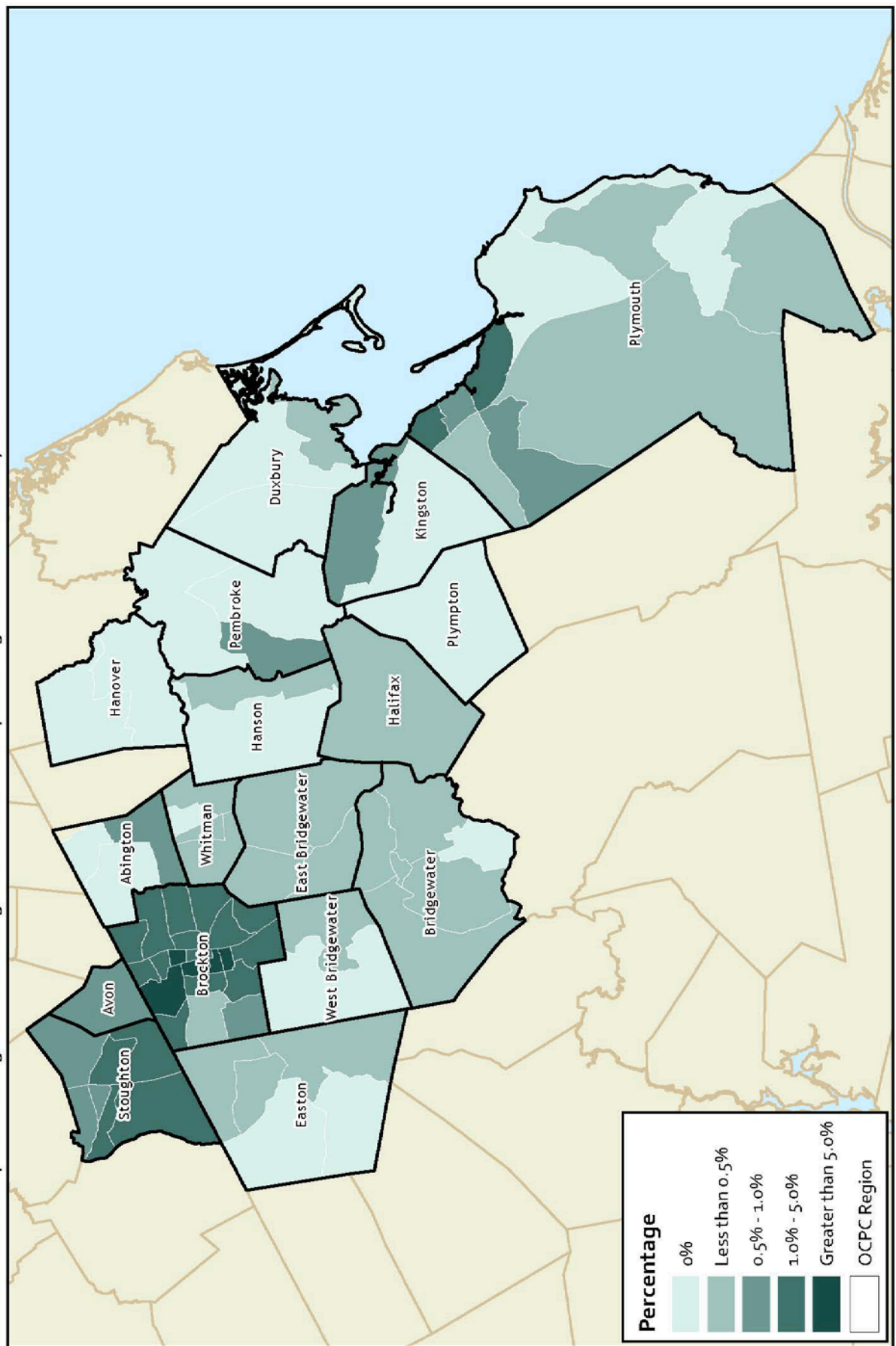
Old Colony Planning Council 70 School Street, Brockton, MA 02301
Data Sources: US Census, Office of Geographic Information (MassGIS), OCPC





Limited English Proficiency

Individuals who speak Portuguese or Portuguese Creole and Speak English Less than Very Well

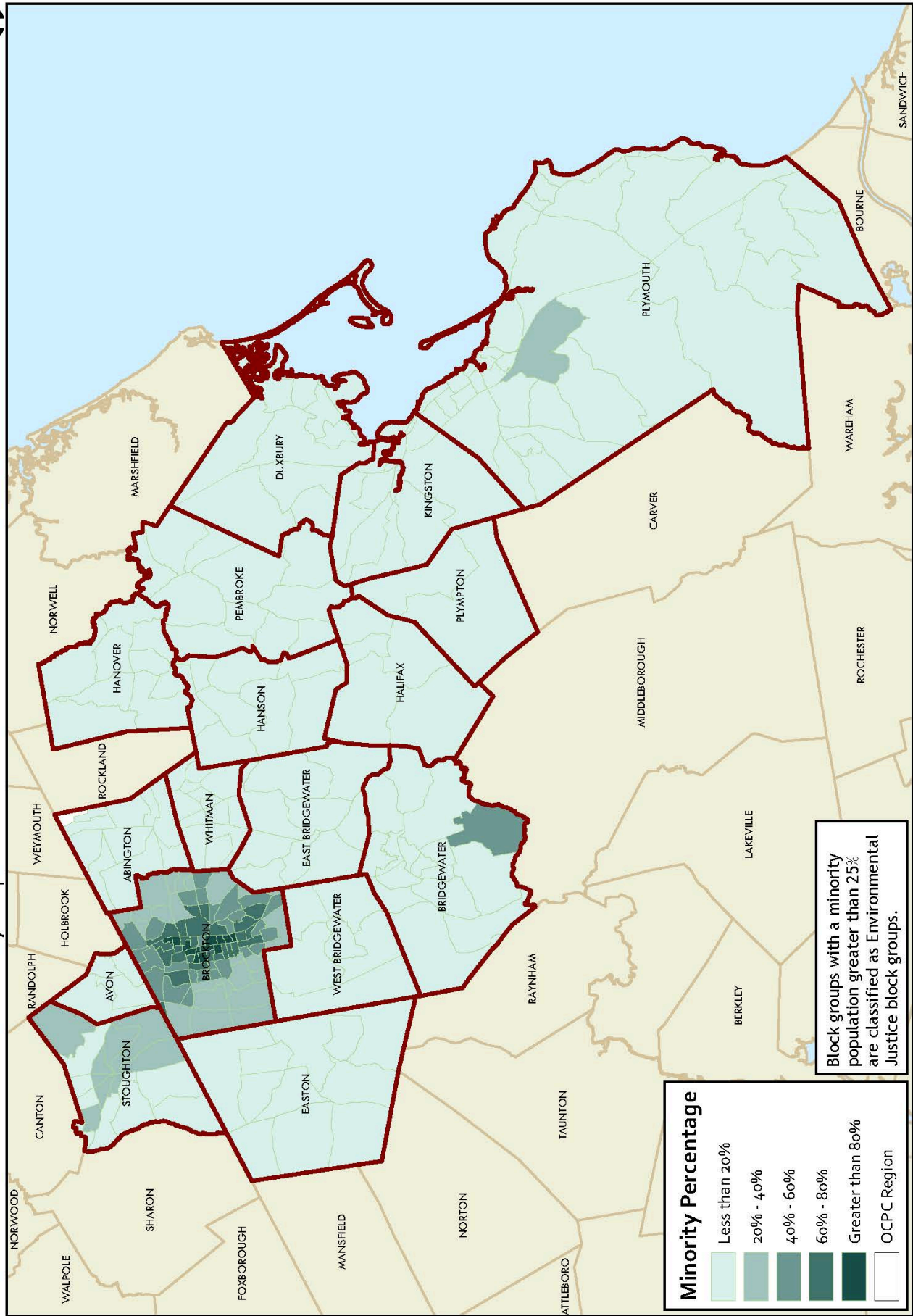


Old Colony Planning Council 70 School Street, Brockton, MA 02301
Data Sources: US Census, Office of Geographic Information (MassGIS), OCPC





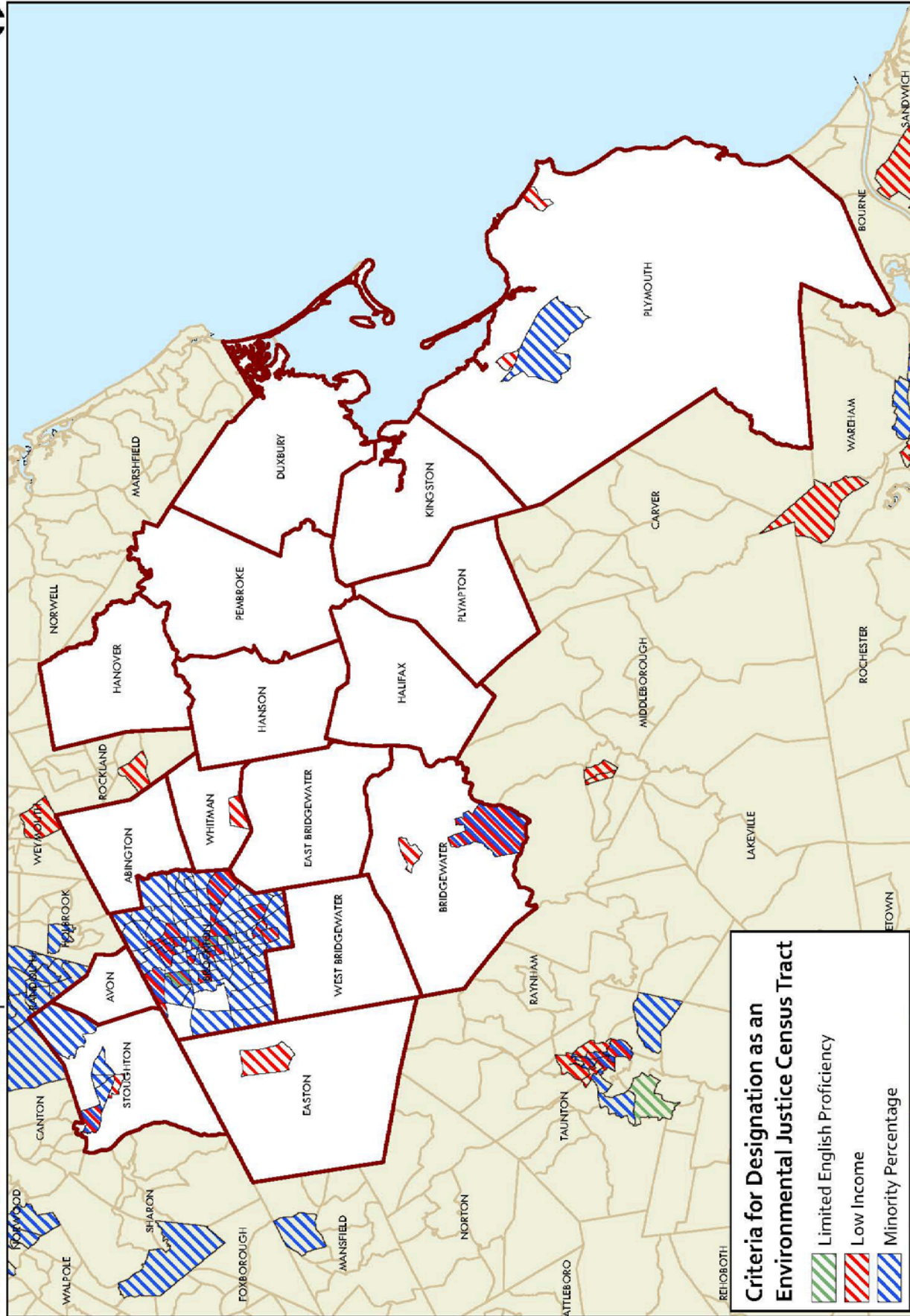
Environmental Justice: Minority Population



Old Colony Planning Council 70 School Street, Brockton, MA 02301
 Data Sources: Office of Geographic Information (MassGIS), OCPC



Environmental Justice Populations



Criteria for Designation as an Environmental Justice Census Tract

- Limited English Proficiency
- Low Income
- Minority Percentage

Old Colony Planning Council 70 School Street, Brockton, MA 02301
 Data Sources: Office of Geographic Information (MassGIS), OCPC



Appendix B: Accessibility Checklist for Meeting Planners

Meeting Date: _____

Meeting Time: _____

Subject of Meeting: _____

Location: _____

- The Old Colony MPO Attendees: Is there at least one person or Department who is responsible for ensuring that the public meeting is accessible for all attendees?

Print Name/Department: _____

Publicizing Meeting:

- Has the public meeting been publicized at least 2 weeks in advance?
- Has the meeting been publicized on the calendar section of the OCPC website and made available to the city and town clerks of the region?
- Has the meeting been publicized in the required foreign languages and ethnic newspapers for the relevant populations in the community where the meeting is to be held, if applicable?
- Does the public meeting notice include accessibility information, how to request a reasonable accommodation, relevant dates for making requests and information on whom to contact to request a reasonable accommodation?
- Does the public meeting notice include information on how to request foreign language interpreters?

Facility: _____

Date of Facility Assessment: _____

- Is the meeting location 1/4 mile or less from the nearest accessible bus stop or rail station, and/ or will BAT service and/ or GATRA service be available at the time of the meeting? If neither of these criteria is possible given unique geographic or temporal challenges, has every

reasonable attempt been made to allow interested parties to attend the meeting through alternative means?

- Where applicable, is there an accessible path of travel provided from the public transportation stop to the meeting location and meeting room?
- If parking will be available at the meeting location, are there accessible parking spaces available (review # of car and van accessible spaces)?
- Is there an accessible path of travel provided from the accessible parking area to the meeting area?
- If the main entrance to the building is not accessible, is there directional signage towards the accessible entrance?
- Is the accessible entrance unlocked and able to be used independently? If the meeting is taking place at night, is the path leading to the alternate entrance well lit?
- If there are restrooms that are open to the public, is there a pair of accessible restrooms available within close proximity of the meeting area? If not, is there at least one accessible gender neutral restroom?
- If there are public phones, is there at least one accessible (TTY and within appropriate height range) telephone available?
- If a stage or platform will be used during the public meeting, is it accessible?
- If a podium will be used during the public meeting, is the podium height adjustable? If not, is there a small table (between 28 and 34 inches in height) provided to the side of the podium?
- Is there a high speed internet connection within the meeting space?

Ensuring Appropriate Accommodations:

- Have sign language and foreign language interpreters, if requested, been reserved for the public meeting?

- Have CART services, if requested, been reserved for the public meeting?
- Are Assistive Listening Devices available for the public meeting? Does someone know how to use the device? Have you checked the devices at least 24 to 48 hours before the meeting and rechecked immediately before the meeting starts? (Note: For large meetings, to avoid the loss of equipment, it is reasonable to ask for a driver's license or other ID as collateral.)
- If requested, are large print copies of meeting handouts available?
- Are printed materials available upon request, in alternative formats and/or relevant foreign languages?
- Are film or video presentations closed captioned and audio described?

Facility/ Room Setup (prior to meeting):

- If the main entrance to the building is not accessible, is the accessible entrance unlocked?
- Is there an integrated seating area for individuals who use a wheeled mobility device in the meeting room?
- Is there seating available for attendees who are deaf or hard of hearing, and have requested an accommodation, near the front of the meeting room so that attendees may see the interpreter/ captioner, or lip read?
- Is there an appropriately lit area in the front of the room for sign/ foreign language interpreters and/ or CART providers?
- Are the aisles at least three feet wide and clear of obstacles or tripping hazards?
- If microphones are used during the public meeting, are adjustable microphone stands available for attendees? Can staff be used as floaters with microphones as an alternative?

For recordkeeping and reporting purposes, the meeting planner should submit a copy of this completed checklist along with a copy of the meeting agenda to the Old Colony Title VI Coordinator. The Old Colony Title VI coordinator will submit these checklists to the following

along with the annual Title VI submission to:

Massachusetts Department of Transportation
Office of Diversity and Civil Rights
10 Park Plaza
Boston, MA 02116

Appendix C: Sample Meeting Posting

Agenda

DATE: <DATE OF EVENT>

TIME: <TIME OF EVENT>

PLACE: <PLACE OF EVENT>

- Agenda item
- Agenda item

This meeting is accessible to people with disabilities. The Old Colony Planning Council/ Old Colony Metropolitan Planning Organization provides reasonable accommodations and/ or language assistance free of charge upon request (including but not limited to interpreters in American Sign Language and languages other than English, assistive listening devices and alternate material formats, such as audio tapes, Braille and large print, as available). For accommodations or language assistance please contact the Old Colony Planning Council by phone: (508) 583-1833 Extension 202, fax (508) 559-8768 or by email at information@ocpcrpa.org.

The Old Colony MPO fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Old Colony MPO operates without regard to race, color, or national origin (including limited English proficiency), age, sex, disability, ancestry, ethnicity, gender, gender identity or expression, sexual orientation, religion, creed, veteran's status, or background. Any person who believes him/ herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/ herself or by representative file a written complaint with the Old Colony MPO. Complaints are to be filed no later than 180 days from the date of the alleged discrimination. This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Please contact Pat Ciaramella at 508-583-1833 Extension 202 for more information.

- If this information is needed in another language, please contact Pat Ciaramella at 508-583-1833 Extension 202.
- Se esta informação é necessária em outro idioma, entre em contato com Pat Ciaramella em 508-583-1833 Ramal 202.
- Si se necesita esta información en otro idioma, por favor póngase en contacto con Pat Ciaramella al 508-583-1833 extensión 202.
- Si yo bezwen enfòmasyon sa a nan yon lòt lang, tanpri kontakte Pat Ciaramella nan 508-583-1833 Ekstansyon 202.

The public discussion of the Transportation Improvement Program (TIP) at Old Colony JTC, Old Colony MPO, and transportation meetings satisfies the Program of Projects (POP) public hearing requirements of the Federal Transit Administration (FTA).

Appendix D: Definitions

Public Meeting - Any meeting open to the general public, hosted by or on behalf of the Old Colony MPO, during which information is shared.

Attendee - An individual attending a public meeting.

Reasonable Accommodation - Any reasonable service, aid, modification or adjustment to the public meeting that gives a person with a disability the opportunity to be an active participant in the meeting process.

Path of Travel - A continuous, unobstructed way of pedestrian passage by means of which an area may be approached, entered, and exited.

TTY (Text Telephone) - An electronic device for text communication via a telephone line, used when one or more of the parties has a hearing or speech-related disability. Public payphones equipped with TTY have a small keyboard that pulls out underneath the phone. Note: TTYs are gradually phasing out for many people due to the increased use of voice and video relay, but they will remain in use for some period into the future.

Clear floor space - The minimum unobstructed floor or ground space required to accommodate a single, stationary wheelchair and occupant.

Wheeled Mobility Device - Means by which some individuals with physical disabilities travel throughout their environment. Commonly refers to such devices as wheelchairs (manual and motorized) and scooters. Non-traditional wheeled mobility devices may include Segways and bicycles.

American Sign Language (ASL) Interpreter - An individual trained to facilitate communication between a deaf American Sign Language user and hearing individuals via American Sign Language.

Assistive Listening Device - An electronic device used by individuals who are hard of hearing to amplify sound. The assistive listening device is usually used as a system where the audio source is broadcast wirelessly over an FM frequency. The person who is listening may use a small FM Receiver to tune into the signal and listen at their preferred volume. There are other forms of Assistive Listening Devices that exist and could be used as alternatives.

CART (Computer Assisted Real-time Transcription) - A trained operator uses keyboard or stenography methods to transcribe spoken speech into written text. This may be done either on site or remotely by using a voice connection such as a telephone, cell phone, or computer microphone to send the voice to the operator and the real-time text is transmitted back over an Internet connection. For meeting rooms without an internet connection, it is possible to

establish connectivity via a WIFI router connection or by using a wireless “hot spot.”

Video Remote Interpreting - A contracted video service that allows individuals who are Deaf to communicate over webcams/ video phones with hearing people in real-time, via a sign language interpreter.

Video and Telecommunication (Voice) Relay Services - Video Relay Service (VRS) is a form of Telecommunications Relay Service (TRS) that enables persons with hearing disabilities who use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text. Video equipment links the VRS user with a TRS operator, called a “communications assistant” (CA), so that the VRS user and the CA can see and communicate with each other in signed conversation. The VRS caller, using a television or a computer with a video camera device and a broadband (high speed) Internet connection, contacts a VRS CA, who is a qualified sign language interpreter. They communicate with each other in sign language through a video link. The VRS CA then places a telephone call to the party the VRS user wishes to call. The VRS CA relays the conversation back and forth between the parties in sign language with the VRS user, and by voice with the called party. No typing or text is involved.

Telecommunications Relay Service (TRS) is a telephone service that allows persons with hearing or speech disabilities to place and receive telephone calls. TRS uses operators, called communications assistants (CAs), to facilitate telephone calls between people with hearing and speech disabilities and other individuals. A TRS call may be initiated by either a person with a hearing or speech disability, or a person without such disability. When a person with a hearing or speech disability initiates a TRS call, the person uses a teletypewriter (TTY) or other text input device to call the TRS relay center, and gives a CA the number of the party that he or she wants to call. The CA in turn places an outbound traditional voice call to that person. The CA then serves as a link for the call, relaying the text of the calling party in voice to the called party, and converting to text what the called party voices back to the calling party. VRS and TRS are overseen by the Federal Communications Commission and private contractors who perform the intermediary communication service are reimbursed for this service.

Closed Captioning - A term describing several systems developed to display text on a television, computer or video screen to provide additional or interpretive information to viewers/ listeners who wish to access it. Closed captions typically display a transcription of the audio portion of a program (either verbatim or in edited form), sometimes including non-speech elements.

Descriptive Video/Described Narration - A feature that makes television programs, videos, films, and other visual media accessible to people who are blind or visually impaired by providing descriptive narration of key visual elements in programs. Key visual elements in a program that a viewer who is visually impaired would ordinarily miss are described by voice.

Actions, costumes, gestures and scene changes are just a few of the elements that, when

described, engage the blind or visually impaired viewer with the story.

Limited English Proficient (LEP) - Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or “LEP.” These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Four Factor Analysis - Federal DOT guidance outlines four factors recipients should consider to assess language needs and decide what steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to the MPO and overall cost.

In each instance, this analysis will enable the MPO staff to determine the extent of language assistance that must be provided to enable LEP individuals to participate in a program or activity. For further information, including answers to specific situations that meeting planners may encounter; planners should consult the ADA Coordinator, the Title VI Specialist and/or the Language Access Plan.

Vital Document - A vital document is determined by the context of a program, service or activity, and can include but not be limited to an application, notice, complaint form, legal contract, and outreach material published by a covered entity in a tangible format that informs individuals about their rights or eligibility requirements for benefits and participation.

Language Access Plan - Under Federal Executive Order Executive Order 13166, each Federal agency is required to prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan is required to be consistent with the standards set forth in related guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.

The Old Colony MPO’s Language Assistance Plan is available on the Old Colony MPO webpage at: http://www.ocpcrpa.org/docs/mpo/Old_Colony_LEP_Plan.pdf

Appendix I: Vehicle Load Policy

BROCKTON AREA TRANSIT

VEHICLE LOAD POLICY

The Brockton Area Transit (*bat*) evaluates load factor on routes to determine if there is a need for additional service. The load factor is defined as how crowded a public transit vehicle is based on the number of seats on the bus and how many standee passengers there are. Additionally, the type of vehicle plays a role in determining the load factor.

The *bat* load factor for crowding on low floor and high floor buses is 1.40, which means that every seat on the bus is full and the number of standees equals no more than 40% of the number of seats on the bus.

Matt O'Neil 6.12.0
Date

Appendix J: Headway Policy

Brockton Area Transit Headway Policy

WEEKDAYS

<u>Route(s)</u>	<u>AM Peak</u>	<u>Midday</u>	<u>PM Peak</u>	<u>Evening</u>
1,2,3,4,4A,5,6,8	20	50	25	45
9	40	50	50	--
10	40	50	45	45
11	40	50	50	--
12	20	50	25	45
13	--	45	45	--
14	40	50	50	--
BSU Green	15	15	15	--
BSU Blue	15	15	15	--
BSU Red	20	20	20	--
BSU Rt. 28	130	100	150	--
Rockland	75	75	75	--

SATURDAYS

1,2,3,4,4A,5,6,8	40	45	45	45
9	--	--	--	--
10/11	40	45	45	45
12	40	45	45	45-95
13	--	45	45	--
14	40	45	45	--

SUNDAYS

1,2,3,8	--	40	40	--
4/4A	--	40	40	--
5/6	--	40	40	--
10/11	--	40	40	--
12	--	40-80	40-80	--

Appendix K: On-time Performance

Performance Dashboard FY15-FY19

Fixed Route	FY15	FY16	FY17	FY18	FY19	FY19 Standard	FY19 Goal
Pass/Rev Hour	26.97	25.80	24.44	25.04	24.28	22	26
On-Time	96.73%	97.68%	96.74%	97.57%	97.81%	95.00%	98.00%
Pass/Rev Mile	2.22	2.15	2.07	2.02	2.02	2	2.2
Demand Response	FY15	FY16	FY17	FY18	FY19	FY19 Standard	FY19 Goal
Passengers	15,480	15,260	14,220	14,220	14,490		
Pass/Rev Hour	2.57	2.59	2.52	2.56	2.51	2.25	2.75
On-Time	86.62%	89.49%	89.99%	87.90%	88.10%	85.00%	90.00%
Safety	FY15	FY16	FY17	FY18	FY19	FY19 Standard	FY19 Goal
Preventable FR Accidents/ 100K miles	1.56	0.23	0.52	1.26	1.27	3	2
Preventable DR Accidents/10K miles	0.46	0.74	0.78	0.39	0.67	3	2
Maintenance	FY15	FY16	FY17	FY18	FY19	FY19 Standard	FY19 Goal
Fixed Route Miles Between Breakdowns w/ passenger interruption	19,067.00	21,934.81	27,955.00	27,761.00	45,778.00	20,000.00	25,000.00
Demand Response Miles Between Breakdowns w/ passenger interruption	9,344.00	36,413.18	40,655.00	33,325.00	37,622.00	25,000.00	30,000.00
Customer Service	FY15	FY16	FY17	FY18	FY19	FY19 Standard	FY19 Goal
Valid Complaints /100,000 FR	4.03	2.08	3.09	2.25	2.52	8	5
Valid Complaints /10,000 DR	0.52	1.42	2.05	1.25	0.85	4	2

Appendix L: Service Availability Policy

June 2020

Brockton Area Transit Service Availability Policy

The Brockton Area Transit (BAT) fixed route service provides public transit in the City of Brockton so that 90% of all residents in the service area are within $\frac{1}{4}$ of a mile walk to a bus stop. Additionally, local bus stops are no more than 3 blocks apart. In addition to bus stops, BAT service offers "flag stops" where the bus can safely stop to board riders.

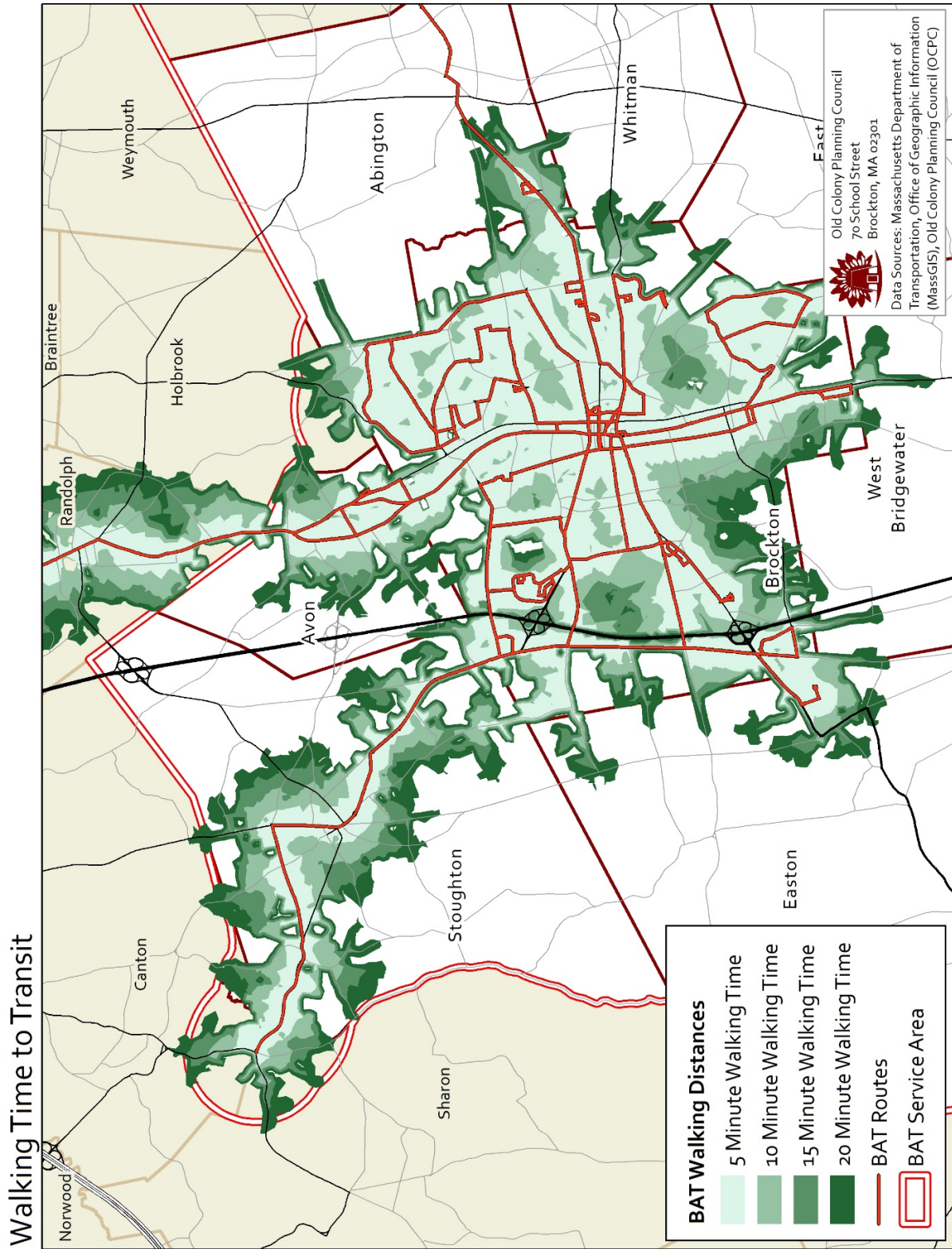
The BAT demand response service, known as DIAL-A-BAT (DAB), is provided to ADA eligible individuals and seniors in the City of Brockton with limited service in Easton, East Bridgewater, Stoughton, Abington, West Bridgewater, Whitman and Avon traveling within $\frac{1}{4}$ of a mile of the regular scheduled fixed route service.

Community Transit Grant service to Rockland, Avon, Stoughton, and Easton is all subject to funding availability. These services are not provided through the traditional 5307 funding mechanism.

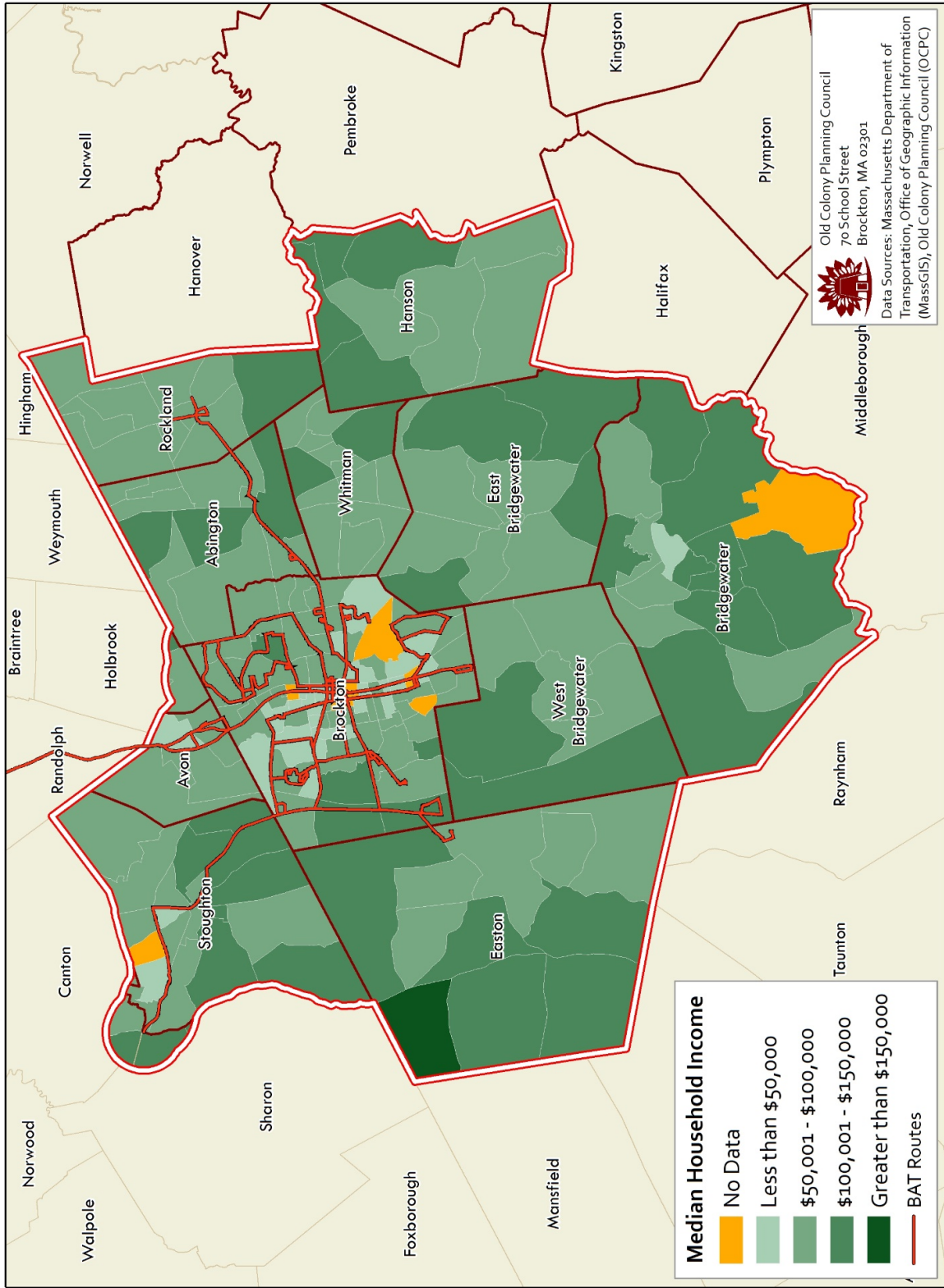


6.1.20
Date

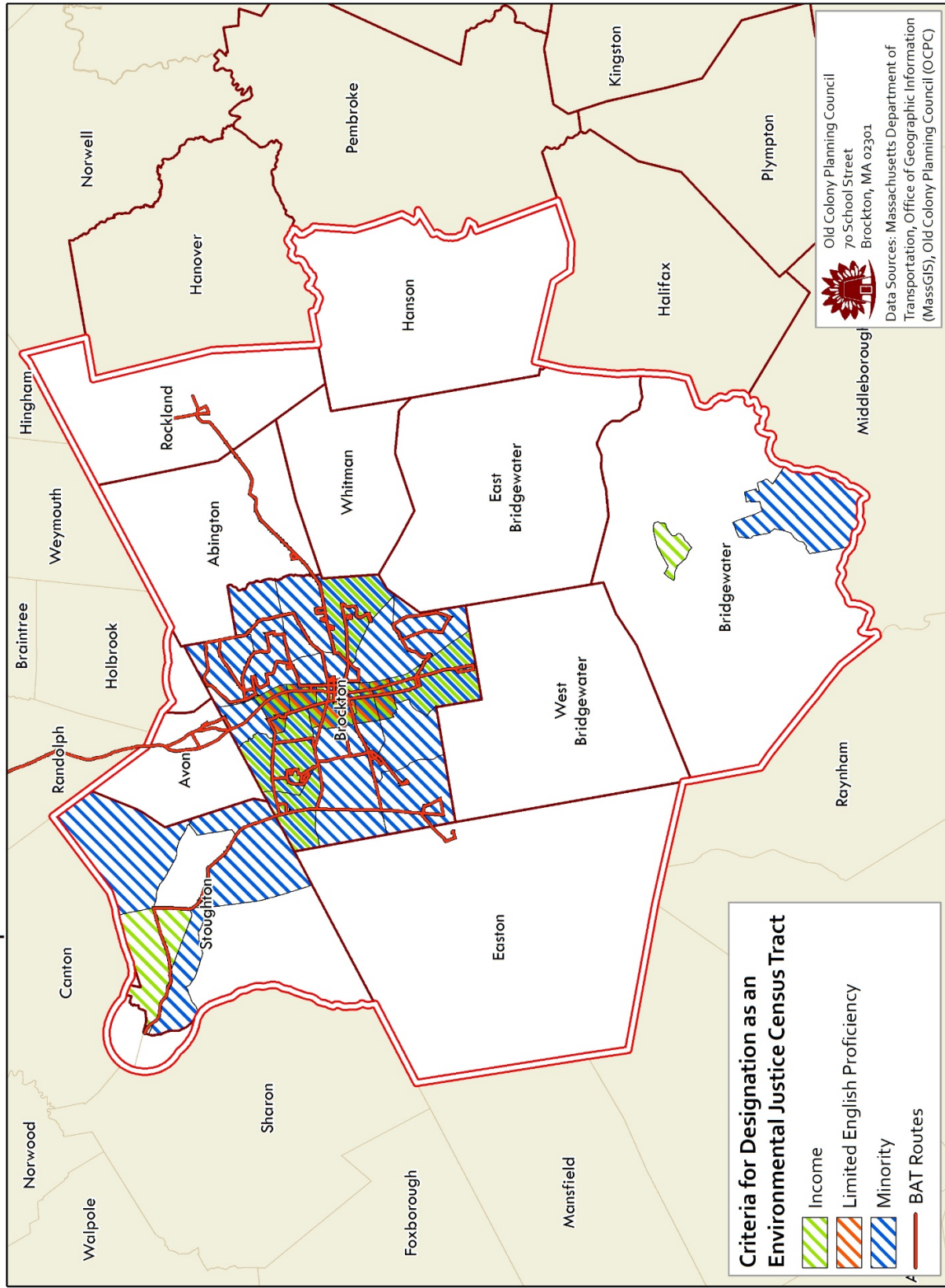
Appendix M: U.S. Census 2018 American Community Survey



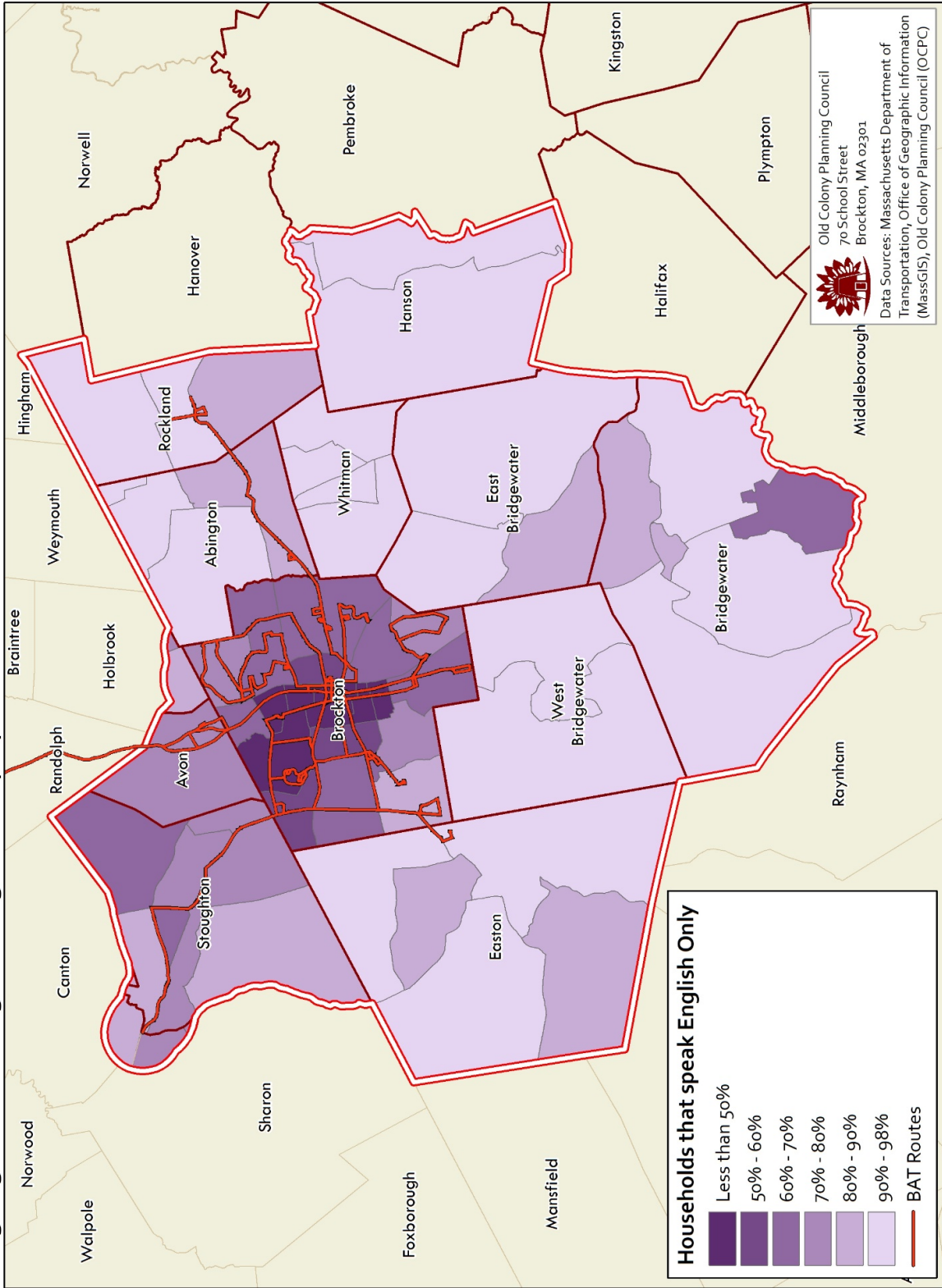
Median Household Income



Environmental Justice Populations



Language: Percentage of English Only Speakers



Appendix N: Population Characteristics

BAT Population Characteristics by Community

City/Town	Total Population	Minority Population	% of Minority Population	Minority Population	Below Poverty	% Below Poverty
Abington	16,330	1,452	8.89%	607	3,72%	
Avon	4,482	1,162	25.93%	457	10.20%	
Bridgewater	27,397	4,317	15.76%	2,103	7.68%	
Brockton	95,781	61,992	64.72%	14,663	15.31%	
Easton	24,306	2,027	8.34%	903	3.72%	
East Bridgewater	14,386	966	6.71%	961	6.68%	
Stoughton	28,534	7,285	25.53%	2,066	7.24%	
Rockland	17,909	1,150	6.42%	1,266	7.07%	
West Bridgewater	7,165	423	5.90%	348	4.86%	
Whitman	14,961	671	4.48%	896	5.99%	
Total	251,251	81,445	32.42%	24,270.00	9.66%	

Source: U.S Census Bureau, American Community Survey (ACS) 2018 5-Year Estimates

Appendix O: Bus Shelter and Benches Inventory

Brockton Area Transit Bus Shelters and Benches Inventory

Route	Location
Downtown	BAT Centre - Commercial St Main & Centre St Legion Parkway (Main St end)
Route 1	Main & Oak
Route 2	Main @ Sargents Plaza IB Main @ Community Bank IB Main St - Old BAT Terminal
Route 3	VA - End of Line (2) Brockton High School Shaw's West Shaw's Torrey St IB Brockton Fair Grounds 500 Belmont St
Route 4	Pleasant & Pearl
Route 4A	Kennedy Dr Westgate Mall (3) Market Basket (2)
Route 5	Brockton Area Multi Service Inc - Quincy St Center St - East Way Plaza OB
Route 6	Crescent St - Crescent Plaza IB Grove St - Liberty Village
Route 9	Liberty St - Signature Healthcare West Elm St IB
Route 10	Lisa & Howard - Eisenhower Estate IB North Quincy - East Ashland IB
Route 12	Avon Center OB Avon Center - Church (St. Michael's) IB
Route 13 (Mini-Maller)	Belair & Earl St
Route 14	Stoughton Center IB West Stoughton Village OB

Appendix P: Composition of Advisory Board & Council

6/20

Brockton Area Transit Authority Advisory Board

By Law, the BAT Advisory Board is comprised of the chiefly elected official in the BAT service area or their designee as well as one representative of the disabled commuter population and one representative of the local rider community population.

<u>Name</u>	<u>Community</u>	<u>Gender</u>	<u>Race</u>
Robert Sullivan	Brockton	M	White
Tom Connolly	Abington	M	White
Frank Hegarty	Avon	M	White
Michael Dutton	Bridgewater	M	White
Cathie Klabish	Brockton	F	White
David Sheedy	East Bridgewater	M	White
Dottie Fulginiti	Easton	F	White
Michael McCue	Hanson	M	White
Larry Ryan	Rockland	M	White
Stanley Zoll	Stoughton	M	White
Richard Downs	Stoughton	M	White
Eldon Moreira	West Bridgewater	M	White
Frank Lynam	Whitman	M	White

Appendix Q: Composition of Advisory Committees

1/20

BAT Consumer Advisory Committee

<u>Name</u>	<u>Community</u>	<u>Gender</u>	<u>Disabled</u>	<u>Elderly</u>	<u>Race</u>
Cathie Klabish	Brockton	F	Y		White
Florence Ross	Brockton	F	Y	Y	White
Judith Stockwell	Brockton	F	Y	Y	White
Linda French	Brockton	F	Y	Y	White
Charles Kilmer	Brockton	M	N	N	White
Paul Chenard	Brockton	M	N	N	Latino

BAT ADA Advisory Committee

<u>Name</u>		<u>Gender</u>	<u>Race</u>
Jay Lynch	Brockton Area Assoc. of Retarded Citizens (BAARC), Brockton	M	White
Diane C Kendrick	Mass Rehabilitation Commission, Brockton	F	Black
Patrick Hamilton	Area Agency on Aging, Brockton	M	White
John Shea	Abington	M	White

Appendix R: Brockton Area Transit Public Hearing Policy

Public Hearing Policy on Fare Increases and Service Reductions

BAT will solicit and consider public comment prior to any fare increase or major service reduction.

A public hearing will be held prior to a major service reduction or fare increase. A major service reduction is defined as:

- A. A greater than 5% reduction in the total number of daily bus trips; or
- B. The elimination of an entire route; or
- C. A major reduction in headways or a significant schedule change impacting more than 50% of the then current schedule.

A fare increase for the purpose of requiring a public hearing shall be defined as an increase in the base adult fare of more than ten (10) percent.

The following are excluded from the public hearing requirement:

- A. events under "force majeure,"
- B. experimental, pilot or temporary service,
- C. special service - or service provided to reduce passenger overload or provided for added passenger convenience,
- D. service funded under special contract (e.g. TDM, CMAQ, MBTA, Welfare to Work, continued new service extension under Senate 6005-0015 if applicable),
- E. holiday service(s),
- F. Ashmont Express, Industrial Park or other similar express services,
- G. Temporary route or schedule changes,
- H. An increase in the cost or elimination of a monthly pass or other discount program.

f: servredpol

Appendix S: Transit Amenities Policy

June 2020

Brockton Area Transit
Transit Amenities Policy

The Brockton Area Transit (BAT) fixed route service provides transit amenities along bus routes based on the number of passenger boardings at bus stops. All bus stops in the City of Brockton include a bus stop placard to alert passengers where the bus will stop. Bus stops with higher boardings will have passenger shelters, benches and/or trash barrels. Accessibility is prioritized when possible.



6.1.20

Date

Appendix T: Vehicle Assignment Policy

June 2020

BROCKTON AREA TRANSIT VEHICLE ASSIGNMENT POLICY

Fixed-Route

The Brockton Area Transit (*bat*) fixed route fleet consists of fifty (50) low floor wheelchair accessible buses that provide service to the City of Brockton and surrounding communities seven days a week. The fleet has an average age of 5.6 years old and the overall fleet condition, both interior and exterior, is good.

The fixed route service for *bat* operates on a radial system or “pulse” from the *bat* Intermodal Centre in downtown Brockton. This system allows for easy passenger transfers as all of the buses leave at set scheduled times. The only exceptions to this would be the Route 13 Mini Maller, which provides loop service to the area elderly housing complexes and shopping venues.

In addition to the above, the schedule is designed so that the buses and drivers do not stay on the same routes or area of the city throughout the day. By having the buses rotate routes during each pulse precludes route discrimination based on the condition of the bus. Furthermore, the pulse system ensures that newer, older, and even hybrid technology buses are rotated and utilized in all geographic areas within the service area.

The actual assignment of the vehicles is completed the evening prior by the operating company for *bat*. A list of available vehicles are developed by the maintenance department and submitted to the operations department for assignment. The operations department will then assign the 40’ vehicles to routes with heavier ridership, such as the Route 12 Ashmont. The 35’ and 30’ vehicles will be assigned to routes with lower ridership and routes requiring tighter turns on narrow streets. However, any vehicle can be assigned to a particular route or area. This method of assignments coupled with the “pulse” system further cements the notion of ensuring that no one route or area is limited to just one type, size, age or condition of bus.

In addition, *bat* contracts with Bridgewater State University to provide vehicles and maintenance and training support. The University operates the service which consists of campus shuttles and connection to Brockton via Route 28.

Demand Response

The Brockton Area Transit (*bat*) demand response fleet, otherwise known as *dial-a-bat* (*dab*), consists of thirty-seven (37) wheelchair accessible buses that provide a shared ride service to the City of Brockton and surrounding communities seven days a week. The fleet has an average age of 4.7 years old and the overall fleet condition, both interior and exterior, is good.

June 2020

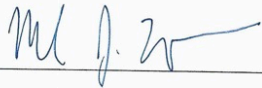
dial-a-bat also provides coordinated service through local area councils on aging. Some councils have their own vehicles but *dab* supplements services that the councils are not able to provide.

The *dab* service operates several types of services. Door to door service is provided for the elderly and disabled. Additionally, service is provided for the Department of Developmental Services (DDS) and non-emergency medical transportation. The *dab* fleet consists of two types of paratransit vehicles. The seating arrangements on each vehicle vary to accommodate the ambulatory and wheelchair client assignments.

The actual assignment of the vehicles is determined by the number of ambulatory and wheelchair clients scheduled per run. For instance if a run includes a DDS workshop that transports fifteen (15) ambulatory clients, the vehicle assigned will consist of seating to accommodate the increased number of ambulatory clients. Another example would be a run that has a DDS workshop that transports four (4) wheelchair clients and three (3) ambulatory clients; then the vehicle assigned would be one that could accommodate those seating arrangements. This method of assignment is an efficient way to accommodate the client needs and ensures that no one geographic area is limited to one type of bus as all of the vehicles are of similar look and size.

Deviated Fixed Tour

Bat provides deviated fixed tour service to the town of Rockland. The service is provided with two minibuses. This service is subject to MassDOT's Community Transit Grant funding availability.



6.1.20

Date

Appendix U: 21 Day Public Comment Period

Appendix V: Public Comments Received:

Appendix W: Advisory Board Meeting Agenda Example & Notice- Multiple Languages

METTING NOTICE

The Advisory Board of the Brockton Area Transit Authority (BAT) will meet at 11:00 am on Thursday, May 28, 2020. The purpose of the meeting is to receive various updates and other business that may come before the Advisory Board. The meeting agenda listing topics to be discussed as known at this time is attached.

BROCKTON AREA TRANSIT AUTHORITY ADVISORY BOARD MEETING AGENDA

11:00 am, Thursday, May 28, 2020

This meeting will be streamed live on BAT's YouTube Channel. Call 508.638.5934 for more information or to submit a public comment

1. Welcome
2. Public Comments
3. Minutes – April 16, 2020
4. Service Update
 1. COVID-19 and Ridership
 2. Performance Dashboard
 3. Employee and Customer Safety
 4. Reopening update
5. Federal and State Update
 1. DBE Goal
 2. State Funding & CARES Act
6. Financial Update
 1. FY2020 Amended Budget
 2. FY2021 Budget Approval
7. Audit and Finance Committee Report/Compensation Committee Report
 1. Compensation and Benefits
8. OCPC Update Administrator's Report
 1. Title VI
 2. Taunton Service Study
9. Administrator's Report
10. Old Business/New Business/Adjourn
 1. Items Not Reasonably Anticipated to be Discussed
 2. Meeting Schedule
 1. Next Board Meeting, October 2020
11. Adjourn

Note: Invitees are respectfully requested to limit their comments to three minutes understanding the work before the Advisory Board and out of respect for others who may desire to offer comments. The items listed are those reasonably anticipated, which may be discussed at the meeting at least forty-eight (48) hours prior to the meeting. Not all items listed may in fact be discussed and other items not listed may also be brought up for discussion to the extent permitted by law.

Posted: KE

Date/Time: 5/25/2020

REYINYON AVI

Komisyon Konsèy Konsiltatif Otorite Transpò Zòn Brockton (BAT) ap rankontre nan 11:00 am nan Jedi, 28 Me, 2020. Objektif reyinyon an se pou resevwa plizyè denve enfòmasyon ak lòt biznis ki ka vini devan Konsèy Konsiltatif la. Sijè reyinyon ajanda lis la yo dwe diskite kom li te ye nan moman sa a taché.

ORDINASYON KONSÈY KONSÈY

POU KONTAKTE OTORIZASYON TRANSIT BROCKTON Z

TRANSN 11:00 am, Jedi, 28 Me 2020

***Reyinyon sa a ap transfere sou entènèt sou Chèn YouTube BAT la. Rele 508.638.5934 pou plis enfòmasyon oswa pou soumèt yon kòmantè piblik **

1. Byenveni
2. Kòmantè Piblik
3. Minit - 16 avril, 2020
4. Sèvis Mizajou
 1. COVID-19 ak Ridership
 2. Dashboard Pèfòmans
 3. Anplwaye ak Sekirite Kliyan
 4. Relouvri aktyalizasyon
5. Federal ak Eta Mizajou
 1. Objektif DBE
 2. Lwa Finansman ak CARE Eta a
6. Mizajou finansye
 1. FY2020 Bidjè Amande
 2. FY2021 Apwobasyon Bidjè
7. Rapò komite odit ak finans komite rapò
 1. Kompansasyon ak Benefis
8. Rapò OCPC Update Administratè la
 1. Tit VI
 2. Taunton Sèvis Efid
9. Rapò Administratè a
10. Ansyen biznis / nouvo biznis ajoune
 1. Atik ki pa rezonab pou yo diskite
 2. Orè Reyinyon an
 1. Next Reyinyon Komisyon Konsèy, Oktòb 2020
11. Ajite

Remak: Envite yo respèman mande pou limitè kòmantè yo a twa minit konprann travay la devan Konsèy Konsèy la ak soti nan respè pou lòt moun ki ta ka vle ofri kòmantè. Atik ki nan lis yo se moun ki preveva rezonab, ki ka diskite nan reyinyon an omwen karant-wit (48) èdoun anvan reyinyon an. Se pa tout atik ki nan lis la ki ka an reyulite diskite epi lòt atik ki pa nan lis la ka diskite tou sou tout mezi labwa pèmet sa

12:00 pm

Appendix X: Review and Approval:

Appendix Y:

BAT

Limited English Proficiency Plan

Brockton Area Transit Authority

BAT

**LIMITED ENGLISH PROFICIENCY (LEP) PLAN/
LANGUAGE ASSISTANCE PLAN (LAP)**

Providing Meaningful Language Assistance

2020

155 Court St.

Brockton, Massachusetts 02302

www.ridebat.com



INTRODUCTION

The Brockton Area Transit Authority (BAT) is the primary public transit provider in the greater Brockton Area. BAT services the City of Brockton and the towns of Abington, Avon, Bridgewater, East Bridgewater, Easton, Hanson, Rockland, Stoughton, West Bridgewater, and Whitman. BAT delivers fixed route, paratransit and flex route services and provides over 2.6 million passenger trips per year. This document will demonstrate how BAT addresses the population it services with Limited English Proficiency.

The intent of this Limited English Proficiency Plan is to ensure that the population that does not speak or read English proficiently has access to BAT services in its service area. The production of multilingual documents and notices and/or interpretation at meetings or events will be provided to the degree that funding permits based on requests for such services and current laws and regulations.

LAW AND POLICIES GUIDING LIMITED ENGLISH PROFICIENCY PLANS

The Brockton Area Transit has developed this plan following the guidelines of the Federal Transit Administration (FTA)'s Title VI Circular 4702.1B and is required to make a submission of its Title VI Program every three (3) years.

Who is an LEP Individual

As defined in the 2010 United States Census, it is any individual who speaks a language at home other than English as their primary language, and who speak or understand English "not well" or "not at all".

Determining the needs

As a recipient of federal funding, BAT is required to take reasonable steps to ensure meaningful access to the information and services it provides. As identified in the Federal Register/Volume 70, Number 239/Wednesday 14, 2005/Notices, there are four factors to consider in determining "reasonable steps".

- **Factor 1:** The number and proportion of LEP persons in the eligible service area
- **Factor 2:** The frequency with which LEP persons encounter BAT services programs
- **Factor 3:** The importance of the service provided by BAT
- **Factor 4:** The resources available and overall cost of providing BAT services

The USDOT Policy Guidance provides recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in the BAT service area in relation to the four factors and the transportation planning process.

LEP ASSESSMENT FOR THE BROCKTON AREA TRANSIT AUTHORITY

Factor 1: The Number and Proportion of LEP Persons in the Eligible Service Area

The first step towards understanding the profile of individuals that could participate in the transportation planning process is a review of Census data. Tables 1 and 2 display language spoken and number of individuals that are LEP. Due to recent changes in the way the U.S. Census Bureau collects information on individuals and their ability to speak English, data is no longer available down to a single community nor bloc group level. Information on LEP individuals is now collected by grouping adjacent communities.

For our planning purposes, we are considering people that speak English “not well” or “not at all” and only the top three language groups are included in the analysis.

Table 1, derived from the U.S. Census’ American Fact Finder, shows the number and percentage of all LEP persons who are five (5) years and older in regard to their English language skills for the communities within the BAT’s service area. As indicated, over 10.06% of BAT’s service area population is not proficient in English. At 17.4%, the communities of Avon, Brockton, and Stoughton possess the highest number of LEP persons in the BAT’s service area.

**Table 1: Limited English Proficient Person in the MPO Planning Area and Adjacent Communities
2018 ACS 5yr B16001 LEP Languages**

Community	Population 5 Years and Older	Number of LEP Persons	Percent of LEP Persons
Avon – Brockton - Stoughton	120,300	20,882	17.4%
Abington – Rockland - Whitman – Easton - East Bridgewater – West Bridgewater - Bridgewater	115,811	2,869	2.48%
Totals:	236,111	23,751	10.06%

Table 2, shows the number and percent of LEP persons by language spoken at the individual’s home constituting 5% of BAT’s service area’s population or 1,000 person or more in said area. Of the LEP persons within the BAT service area meeting this measure, 32.7% speak Portuguese at home. The second most common language of the area’s LEP population is French Creole at 36.5%, making this the most significant percentage of the area’s LEP population. Spanish speakers make up 16.1% of the service area’s LEP population.

LEP Persons	Portuguese Language	French Creole language	Spanish Language
5 years older Total	7,769	8,667	3,824
Percent of all LEP Persons	32.7%	36.5%	16.1%

Factor 2: The Frequency in which LEP Individuals Encounter BAT Programs

BAT’s bus routes transvers many of the highest minority census tracts in the Greater Brockton Region. Given that BAT operates in these high minority communities, the potential for encountering LEP individuals is high. However, to date, no requests have been made by any individuals or groups directly to BAT for Portuguese (Cape Verdean Creole), Haitian Creole, Spanish or other language interpreters or publications. Nevertheless, to assist with the identification of language spoken, staff utilizes the 2010 U.S. Census Language Identification Flashcards. BAT also has number of employees that speak multiple languages and language-dialects that will be utilized in assisting LEP individuals.

An underlying principle of BAT’s service planning process is public participation, coordination, and consultation with appropriate agencies and groups. BAT’s staff engages the public to the maximum extent possible. Various strategies are deployed, documented, and evaluated. These strategies consist of activities designed to build better relationships with citizens that are engaged with their communities and businesses, along with individuals of “traditionally underserved” communities and Limited English Proficiency, local officials, non-profit organizations, and other transportation authorities or agencies. The main purpose of the public participation process is to educate and inform stakeholders on possible service changes, whether those changes are service increases, reductions, route realignments, or fare changes. The process is designed to fulfill federal-aid requirements and to document people’s public transportation needs. BAT uses the Old Colony Planning Council’s Public Participation Plan as part of BAT’s outreach efforts.



Figure 1.1: 2019 BAT Potential Impacts of Ride-Hailing Study at the BAT Intermodal Center Transportation

Figure 1.2: 2019 BAT Potential Impacts of Ride-Hailing Study at the BAT Intermodal Center Transportation

One strategy that BAT’s staff uses to reach out to the Limited English Proficiency population in the region is through the use of surveys. Surveys are great tools to reach individuals that feel uncomfortable participating with the public and for individuals that cannot attend meetings and public hearings; they are also made available in multiple languages. BAT also conducts outreach to LEP community groups, churches, and other organizations to help facilitate LEP population participation.

Factor 3: The Importance of the Service Provided by BAT

Public transportation provides an essential link to those that have no other resources in which to travel. Considering that LEPs tend to use public transportation in greater numbers than non-LEPs, public transit provides a vital service to this group. The demand response service and bus routes BAT provides enables individuals to reach their workplace, medical appointments and attend to daily needs. Without the transportation services and amenities provided by BAT, LEP individuals and their families could be negatively impacted. BAT uses federal and state funds to plan future transportation projects, operate existing transit service, provide passenger and maintenance facilities, and transit amenities. The Federal funds that BAT receives to provide all services and amenities mentioned directly benefit all BAT riders, including LEPs.

- **Factor 4: The Resources Available and Overall MPO Cost**

Given the size of the LEP population in BAT’s service area, full multi-language translations of all documents other than those concerning the most urgent of service notices or policies would be cost prohibitive. At this time BAT utilizes a combination of it bus operators and other employees, along with American Translation Partners to assist in translating vital documents and customer service related exchanges with LEP individuals. With the continuing growth of the Portuguese, Haitian Creole, and Spanish speaking population in the BAT service area that do not speak English well, the continuation of exploring cost effective translation service is ongoing

As a result of this large LEP population and potential for greater contact with these individuals, BAT makes use of technological solutions to address its multiple language translation needs. Website translating services like Google Translate are also being utilized in addition to BAT's workforce language skills to translate BAT's website and service notices for the LEP community. BAT will continue its efforts to collaborate with state and local agencies and community groups to provide language translation and interpretation services when needed or requested taking cost into consideration. The translation of these documents will begin after the final English version has been completed. Portuguese, Haitian French Creole, and Spanish outreach materials from organizations such as federal, state, and local transportation agencies will be used when possible.

MEETING THE REQUIREMENTS

Engaging the diverse population within BAT's service area is important. BAT is committed to providing quality public transit services to all its customers, including those with limited English proficiency. Portuguese, Haitian French Creole, and Spanish are the most dominant language spoken by LEP individuals in the BAT service area.

Safe Harbor Stipulation and LEP Thresholds

Federal law provides a "safe harbor" stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A "safe harbor" means that as long as a recipient (BAT) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four-factor analysis.

Evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation can also be provided orally.

The "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide. However, BAT will make every effort to comply with providing interpreters when requested.

Providing Notice to LEP Persons

US DOT guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of services available free of charge in a language the LEP persons would understand.

Where appropriate and feasible, the staff will include the following language in English, Portuguese, Haitian French Creole, and Spanish on meeting notifications, service announcements, and other informational materials:

Public participation is solicited without regard to race, color, national origin, age, sex, religion, disability or family status. Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services for a meeting (free of charge) should contact Michael Lambert at 508-588-2240 or Isacchetti@ridebat.com at least seven days in advance.

Se solicita La participación del público, sin importar la raza, color, nacionalidad, edad, sexo, religión, incapacidad o estado familiar. Personas que requieran facilidades especiales bajo el Acta de Americanos con Discapacidad (Americans with Disabilities Act) o personas que requieren servicios de traducción (sin cargo alguno) deben contactar a Michael Lambert al teléfono 508-588-2240 o kriddell@ridebat.com por lo menos siete días antes de la reunión.

A participação do público é solicitado, sem distinção de raça, cor, nacionalidade, idade, sexo, religião, deficiência ou situação familiar. Pessoas que necessitam de acomodações especiais sob o Americans with Disabilities Act ou pessoas que necessitam de serviços de tradução para uma reunião (sem custo) devem entrar em contato Michael Lambert at 508-588-2240 or kriddell@ridebat.com pelo menos sete dias de antecedência.

Se Montre granmoun ki patisipasyon solisite san yo pa konsidere ras, koulè, orijin nasyonal, laj, sèks, relijyon, andikap yo oswa kondisyon fanmi yo. Moun ki bezwen aranjman espesyal anba Ameriken Andikape yo Act oswa moun ki bezwen sèvis tradiksyon pou yon reyinyon (gratis) ta dwe kontakte Michael Lambert at 508-588-2240 or kriddell@ridebat.com omwen sèt jou an davans.

BAT will use the following methods for notification:

- Signage indicating that free language assistance is available with advance notice
- Stating in outreach documents that language services are available
- Working with community-based organizations and other stakeholders to inform LEP individuals of BAT's transit services and the availability of language assistance
- Including notices in local newspapers in languages other than English
- Providing notices on non-English-language radio and television stations about BAT's transit services and the availability of language assistance
- Providing presentations and/or notices at schools and community based organizations (CBO).
- Website Translation Tools

BAT will publicize the availability of interpreter services, free of charge, with adequate notice, prior to BAT public meetings, workshops, forums or events that will be publicly noted on the BAT website, in meeting notices (packets), and using the following additional tools as appropriate:

- Signage
- Public outreach material
- Community-based organizations
- Local newspapers

- Old Colony Library System

BAT defines an interpreter as a person who translates spoken languages orally, as opposed to a translator, who translates written languages and transfers the meaning of written text from one language into another. BAT will request language interpreter services from BAT staff or through contracted interpreter service agencies.

Identifying Persons Who May Need Language Assistance

When encountering a LEP person(s), staff will use Language Identification Flashcards to identify that person's primary language. Language Identification Flashcards, as developed by the U.S. Census Bureau (<https://www.lep.gov/ISpeakCards2004.pdf>), are translated into 51 different languages. The flashcards are used by the Census Bureau and other federal agencies to identify the primary language of LEP persons during face to face encounters.

The staff will make the Language Identification Flashcards available at all public meetings. Once a LEP person's primary language is identified using the flashcards, the staff will assess the feasibility of providing written translation service, and/ or oral interpretation assistance to the LEP person.

Language Assistance

Information regarding BAT's service planning processes are made available through multiple means, including translated public meeting notices and providing a bilingual staff whenever possible. BAT's future programs and services to enhance accessibility of transit services to LEP persons likely include:

- Partnerships with Old Colony Planning Council (OCPC) and community organizations to develop a list of language translation volunteers who are available for public meetings. This option could be used where advanced notice is provided that translator services are needed. This option may also help increase the number of languages for which translation services are available.
- Continue work with OCPC in development of written translation and oral interpreter service providers' database. This would improve the speed and convenience with which written documents can be translated for the public, and reduce the need to have public requests for them.
- Regular updates to this LEP Plan, as needed by new events, such as the release of new language-related demographic data from the U.S. Census Bureau/or indications of increases in LEP population.
- Identification of community-based organizations that are not being contacted through existing outreach.

BAT intends to continue to make key documents, important service notices, and public meeting notices available in Portuguese (Cape Verdean Creole), Haitian Creole, and Spanish when requested. Key documents include the Regional Transportation Plan, the Transportation Improvement Program, the Public Participation Plan, Public Hearing Policy, Notice of Protection, Complaint Procedures, and Service Accouchements available in Portuguese (Cape Verdean Creole) Haitian Creole, and Spanish.

A goal of the MPO's (BAT) *Public Participation Plan* is to provide user-friendly material that will be appealing and easy to understand. BAT may provide reports and analysis in alternative formats, such as brochures or newsletters, depending on the work product.

BAT will utilize visualization techniques, methods and devices that do not use language alone. For example, use of pictograms, symbol signs, diagrams, color code warnings, illustrations, graphics, and pictures can be considered information using few words in any language. When appropriate, schematic maps can similarly communicate large amounts of information without words.

BAT Staff Training

In order to establish meaningful access to information and services for LEP individuals, BAT will properly train its employees to assist in person, and/or by telephone, LEP individuals who request assistance. BAT Board members will receive a copy of the LEP Plan, assuring that they are fully aware of and understand the plan and its implementation.

Monitoring and Updating the Language Assistance Plan

The LEP/ Language Assistance Plan as part of BAT's Title VI Plan, will be reviewed triennially by Title VI coordinators on staff at the Old Colony Planning Council and BAT in coordination with Title VI report submission. This triennially review will include a review of whether existing assistance is meeting the needs of LEP persons, and whether new documents, programs, services, and activities need to be made accessible for LEP individuals. Such guidance will also be based on consideration of the frequency of encounters with LEP language groups and the availability of resources.

Additionally, as new data is made available on the demographics of the region and the resulting transportation needs (Updated U.S. Census Data), this Language Assistance Plan will be reviewed and updated to respond to the needs of the region's growing and changing population.