

MetroWest Regional Transit Authority (MWRTA)

TITLE VI PROGRAM

FFY2026-FFY2028



Reference: FTA Circular 4702.1B

Updated October 1, 2025

Title VI Program Statement

Federal Nondiscrimination Protections

Title VI of the Civil Rights Act of 1964 prohibits the discrimination of individuals on the basis of race, color, and national origin in programs or activity that receives federal financial assistance. Specifically, Title VI states that “no person in the United States shall, on the basis of race, color, or national origin (including English proficiency), be excluded from participation in, be denied the benefits of, or to be subject to discrimination under any program or activity receiving federal financial assistance.” (42 USC Section 2000d). Related federal nondiscrimination laws administered by the Federal Transit Administration prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within MWRTA Title VI Programs consistent with federal interpretation and administration. Additionally, MWRTA 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

MWRTA 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. MWRTA also 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.

The MetroWest Regional Transit Authority (MWRTA) is a strong supporter of civil rights in the workplace and The Authority’s community; as such, we are committed to the letter and intent of Title VI of the Civil Rights Act of 1964. This Title VI Program has been adopted to document MWRTA’s adherence to non-discrimination policies in its operations.

At the discretion of FTA, information other than what is required by this circular may be requested, in writing, from a recipient or subrecipient to investigate complaints of discrimination or to resolve concerns about possible non-compliance with Title VI. If you need this information or have further questions about Title VI, please contact The Authority’s Title VI Coordinator:

Mark McClanan , Deputy Administrator of Operations
MetroWest Regional Transit Authority (MWRTA)
15 Blandin Avenue
Framingham, MA 01702
Email: mark.mcclanan@mwrt.com
Phone: (508) 935-2222 x7105

I Title VI Information Dissemination

In compliance with 49 CFR Section 21.9 (d) Notice to Beneficiaries of Protection under Title VI, MWRTA provides Title VI information on its website <http://mwrta.com/information/policies> . The website provides the Federal Title VI program, including contacts for people seeking additional information on the agency's Title VI program. MWRTA's website is used by The Authority's customers and employees as it is the main portal for schedules and real-time bus location information with news and updates related to the transit authority.

While MWRTA believes the website reaches many of The Authority's customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Notice to Beneficiary information regarding Title VI is also posted at The Authority's main transfer Hub located at 15 Blandin Avenue in Framingham. Many of The Authority's customers come to transfer between buses, add value to their passes, or be certified for various programs at the Hub. The information is posted in employee kitchens for both contracted and MWRTA employees. MWRTA also provides informational Title VI outreach to employees, contractors, and vendors via the monthly Hub Happenings Newsletter. To ensure that the Title VI information reaches the riding public, MWRTA posts the Notice to Beneficiary information on all fixed route and demand response vehicles. MWRTA emphasizes the importance of Title VI in its new hire orientation, and this information is available in the preferred language in both electronic and printed form.

II Subcontractors and Vendors

All contractors, subcontractors, and vendors receiving federal funds are subject to the provisions of Title VI of the Civil Rights Act. Federally funded contracts and procurements (where applicable) include non-discrimination provisions to ensure that Title VI requirements are followed. Title VI compliance remains an important element of The Authority's organization.

III Record Keeping

Mark McClanan is the MWRTA's Title VI Coordinator. Mr. McClanan is the agency's Deputy Administrator of Operations and a prominent decision-making employee who reports directly to the agency's Administrator. Mr. McClanan maintains the agency's records and is key in the development of contracts and other Title VI relevant materials, including human resource materials.

A log of Title VI complaints, follow-up activities, and resolutions is maintained by the MWRTA. Mr. McClanan is the primary investigator of Title VI complaints for the agency. Included in the file are copies of all relevant information regarding complaints or lawsuits filed against the transit authority. A copy of the log sheet is included as an appendix to this Title VI Program.

MWRTA has not received any Title VI complaints from either passengers or employees.

Title VI Program Checklist

Recipients Serving Urbanized Areas With Populations of 200,000 People or Greater

The following sections address the requirements of the Title VI Program for recipients serving urbanized areas with populations of 200,000 people or greater.

Provision: Title VI Complaint Procedures

Circular Reference: Chapter IV, Part 2

Regulations or Reference: 49 CFR 21.9(b)

Reporting Requirement: Procedures for Filing a Title VI Complaint

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI complaint investigation and tracking procedures developed by the recipient.

Title VI Complaint Procedures

The MWRTA Title VI process involves three steps: initiation of the complaint, information gathering, and determination. MWRTA will investigate all complaints and promise a determination for the complainant within two weeks. If a person is unsatisfied with the determination, they may appeal the finding and work directly with the MWRTA Administrator to seek a different resolution. If that decision is not acceptable to the complainant, they will be referred to the Federal Transit Administration to pursue an alternate resolution.

A copy of the complaint process is included in English, Spanish, and Portuguese as Appendix A to this program.

Title VI Complaint Policy

If you feel you have been discriminated against by MetroWest Regional Transit Authority (MWRTA) staff, contractors, or service provided by the agency, please contact the MWRTA Title VI Officer - Mark McClanan at 508-935-2222. Mr. McClanan will request your complaint be submitted in writing using the form provided. Please include as much information as possible, including the date, time, and location of the incident. Mr. McClanan will investigate the complaint and respond to you within two weeks.

If the investigation and resolution are not satisfactory, you have the right to appeal by contacting the agency Administrator, Jim Nee, who will provide a determination and a proposed resolution on the matter within two weeks. The MWRTA Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration (FTA) at 617-494-2055 for further determination. When contacting the FTA, please refer to Title VI complaints, and you will be redirected to the appropriate staff person.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is the Authority's goal to ensure that all people are treated fairly in the provision of federally funded transit services.

A copy of the complaint form is included as Appendix B of this program.

Provision: Title VI Investigations, Complaints or Lawsuits

Circular Reference: Chapter IV, Part 3
Regulations or Reference: 48 CFR 21.9(b)
Reporting Requirement: List of Title VI investigations, complaints, or lawsuits filed with the agency since the last submittal

In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color or national origin. The list shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation, lawsuit, or complaint.

Upon adoption of this document, the MWRTA had not received any Title VI complaints from either passengers or employees. MWRTA has a process in place to record any investigations, complaints, and lawsuits as well as the ethnicity of MWRTA board/committee members. A copy of these templates are attached as Appendix C of this program.

Provision: Access to Services by Persons with Limited English Proficiency (LEP)

Circular Reference: Chapter IV, Part 4
Regulations or Reference: 49 CFR 21.5(b) and DOT LEP Guidelines
Reporting Requirement: Agency's Plan for Providing Access to meaningful activities and programs for persons with LEP based on DOT LEP guidance – or – Agency's alternative framework for providing access to activities and programs

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to benefits, services, information, and other essential portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Developing a Language Implementation Plan: Recipients and subrecipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language

implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance. Certain FTA recipients or subrecipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient’s program or activities. Recipients or subrecipients who elect not to prepare a written language implementation plan should consider alternative ways to reasonably provide meaningful access. The elements of an effective implementation plan on language assistance for LEP persons can be found at Section VII of the Department’s Policy Guidance located at 70 FR 74087 (2005).

Individuals who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or “LEP.” According to the U.S. Census Bureau’s American Community Survey (ACS), 29.6 million people in the United States have limited English proficiency (LEP). This is based on the number of households that speak a language other than English.

Title VI of the Civil Rights Act of 1964, 42 USC 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau versus Nichols*, 414 US 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

To assess the needs in The Authority’s community, MWRTA conducted a four-factor analysis to determine The Authority’s language assistance needs and to be able to target resources appropriately.

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1, Step 1 - Identify any concentrations of LEP persons within your service area

The following chart provides an overview of local populations five years and older who speak English “not well” or “not at all.” Data used in these Tables were provided by the American Community Survey.

<https://www.census.gov/acs>. Data extracted from 2024: ACS 1-Year Estimates Data Profiles; Selected Social Characteristics.

Community	Population >5 Years	Total LEP	%LEP
Ashland	18,521	1,392	7.50%
Dover	5,893	116	1.97%
Framingham	69,746	17,872	25.62%

Holliston	14886	2102	14.12%
Hopedale	5958	188	3.17%
Hopkinton	19,050	605	3.18%
Hudson	19,896	1,828	9.18%
Marlborough	40,778	7,018	17.21%
Milford	30,033	5,925	19.53%
Natick	36,266	2,779	7.66%
Sherborn	4404	36	.8174%
Southborough	10304	609	5.91%
Sudbury	18887	433	2.29%
Wayland	13762	748	5.435%
Wellesley	30,003	1544	5.14%
Weston	10654	493	4.62%
Total	349,341	43,688	12.50%
Average		2731	8.33%

<https://www.census.gov/topics/population/language-use/about.html>

The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold but has some utility for translators or researchers. The simplest collapse recodes languages other than English into four major language groups: Spanish, Other Indo-European languages, Asian and Pacific Island languages, and other languages. A more detailed collapsing uses 42 non-English languages and language groups. The table below shows more detail on the four (4) and 42 language groups.

Four and Forty-Two Group Classifications of Languages Spoken at Home with Examples

Four Group Classification	Forty-Two Group Classification	Examples
Spanish	Spanish	Spanish, Ladino
Other Indo-European languages	French (incl. Cajun)	French, Cajun
	Haitian	Haitian
	Italian	Italian, Sicilian
	Portuguese	Portuguese, Kabuverdianu
	German	German, Luxembourgish
	Yiddish, Pennsylvania Dutch, or other West	Dutch, Yiddish

Four Group Classification	Forty-Two Group Classification	Examples
	Germanic languages	
	Greek	Greek
	Russian	Russian
	Polish	Polish
	Serbo-Croatian	Bosnian, Croatian, Serbian
	Ukrainian or other Slavic languages	Bulgarian, Czech, Ukrainian
	Armenian	Armenian
	Persian (incl. Farsi, Dari)	Iranian Persian (Farsi), Dari
	Gujarati	Gujarati
	Hindi	Hindi
	Urdu	Urdu
	Punjabi	Punjabi (Panjabi)
	Bengali	Bengali
	Nepali, Marathi, or other Indic languages	Nepali, Marathi, Konkani
	Other Indo-European languages	Albanian, Lithuanian, Pashto (Pushto), Romanian, Swedish
	Telugu	Telugu
	Tamil	Tamil
	Malayalam, Kannada, or other Dravidian languages	Malayalam, Kannada
Asian and Pacific Island languages	Chinese (incl. Mandarin, Cantonese)	Mandarin Chinese, Min Nan Chinese (incl. Taiwanese), Yue Chinese (Cantonese)
	Japanese	Japanese
	Korean	Korean
	Hmong	Hmong
	Vietnamese	Vietnamese
	Khmer	Central Khmer (Cambodian)
	Thai, Lao, or other Tai-Kadai languages	Thai, Lao
	Other languages of Asia	Burmese, Karen, Turkish, Uzbek
	Tagalog (incl. Filipino)	Tagalog, Filipino
	Ilocano, Samoan, Hawaiian, or other Austronesian languages	Cebuano (Bisayan), Hawaiian, Iloko (Ilocano), Indonesian, Samoan
All other languages	Navajo	Navajo
	Other Native languages of North America	Apache languages, Cherokee, Lakota, Tohono O'odham, Yupik languages
	Arabic	Arabic languages

Four Group Classification	Forty-Two Group Classification	Examples
	Hebrew	Hebrew
	Amharic, Somali, or other Afro-Asiatic languages	Amharic, Chaldean Neo-Aramaic, Somali, Tigrinya
	Yoruba, Twi, Igbo, or other languages of Western Africa	Akan (incl. Twi), Igbo (Ibo), Wolof, Yoruba
	Swahili or other languages of Central, Eastern, and Southern Africa	Ganda, Kinyarwanda, Lingala, Swahili
	Other and unspecified languages	Hungarian, Jamaican Creole English, Unspecified

Of those languages most popular in the MetroWest as a whole, Spanish represents just over half of the speakers who speak English “not well” or “not at all” at 35%. Portuguese is the second most common language at 23%. Chinese (Mandarin/Cantonese) is the third most commonly spoken language, at 11%. Other languages spoken by people over five years of age who speak English “not well” or “not at all” totaling 31% are Russian, French (Creole), Vietnamese, Korean, Persian, German, Gujarati, Hebrew, Arabic, Polish, Cantonese, Japanese, Indian (not classified), Yiddish, Armenian, Khmer, Mandarin, Bengali, Czech, and Thai.

Ten of the sixteen communities in the MetroWest area have Portuguese as the dominant language for people who do not speak English “very well” or “not at all.” These communities are Ashland, Holliston, Hopedale, Hopkinton, Hudson, Natick, Sherborn, Sudbury, Wayland, and Wellesley. Spanish is the most widely spoken language among the LEP population in Dover, Framingham, Marlborough, Milford, Southborough, and Weston.

Three languages qualify as Safe Harbor languages; Spanish, Portuguese, and Chinese Mandarin. Safe Harbor provision for translation of written material stipulates if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the MWRTA’s written translation obligations. There are 9,716 LEP people who speak Spanish as their primary language in the MWRTA service area, representing 2.41% of the population, and 6,521 LEP people who speak Portuguese, representing 1.5% of the population of the service area. The next most popular language for the LEP community in the MetroWest service area is Chinese Mandarin, with 3,087 people speaking the language, representing 1% of the population.

Task 1, Step 2: Consult state and local data sources

MWRTA researched information provided by local workforce investment Boards in the MetroWest region of Massachusetts to further determine the mix of languages throughout its 16 member communities. One such organization, the 495/MetroWest Partnership, is a unique public/private collaboration among businesses, municipalities, and other stakeholders. Member organizations work synergistically to prepare

for and cultivate sustainable growth. The Partnership’s mission is to lead the advancement of its 36-community region as an exceptional location for people, businesses, and communities.

The 495/MetroWest Partnership ensures meaningful access to all aspects of the Agencies’ programs, services, and activities for all Limited English Proficiency (LEP) customers by providing language expertise, support, and guidance. Abiding by the values of the Commonwealth ensures that non-discrimination, equal access, and opportunity are safeguarded, promoted, and reflected in The Authority’s programs, services, and activities.

<https://www.mass.gov/files/documents/2019/04/16/DCS%20Staff%20PPP%20generic.pdf>

The MassHire Metro South/West Career Centers offer valuable assistance to low-income, unemployed adults seeking to support their families in the college labor market. Job seekers are given the opportunity to upgrade their skills, making them more employable, and are offered useful resources such as career counseling and resume-building software. These services open numerous doors and make a difference in the lives of both prospective employees and employers.

In the past, consumers have requested documents considered vital in the Title VI Program. These vital documents are currently available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, then please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。

Rúguǒ xūyào qítā yǔyán de xīnxī, qǐng zhìdiàn (508)935-2222 yǔ MWRTA liánxì.

Task 1 Step 3: Reach out to community organizations that serve LEP persons

MWRTA is an active participant in the community and regularly works with schools, agencies, and organizations that provide services to members of the LEP community. We provide information to these organizations directly that can be used to reach out to their clients in a “train the trainer” style model. Also, MWRTA employs a diverse workforce that shares its knowledge and skill sets. For example, MWRTA will use intermediaries to provide information to persons who do not speak English well or at all. We also hold training and informational sessions throughout the service area to disseminate information about the Authority to the community, including at the Callahan Center and the Framingham Housing Authority, where MWRTA has utilized translators to communicate with LEP individuals. Some of the agencies that we work with use LEP specialists who assist with training. Included in this list of

organizations are hospitals and the Councils on Aging (COAs). The Authority consults with these agencies to determine the best way to distribute information to the community. A list of vital documents translated into Safe Harbor languages is attached as Appendix E to this document.

Factor 2: The frequency with which LEP Individuals come into contact with your programs, activities, and services.

MWRTA has surveyed agency staff to determine the frequency of contact with LEP persons either through phone contact, at the Authority's customer service desk located at the Blandin Hub, or while traveling throughout the system.

Agency call center staff observed that they received daily requests in Spanish. The agency is staffed with Spanish-speaking call takers to address these calls. Callers who speak Other languages are referred to the agency's language translator.

Customer service representatives and call takers are trained to assist LEP individuals, and work diligently to meet their translation needs. However, if communication becomes a barrier, the MWRTA has retained a real-time language translator that employees can use to provide information and book trips. This service provides the Authority's customer service representatives with over 240 languages, including all languages identified in the Authority's assistance needs, in real-time translation.

Discussions with drivers indicate that they have passengers who are LEP and that they are able to answer questions intuitively, such as "¿Donde esta la Market Basket?" When translated from Spanish, "where is Market Basket?" When a driver en route encounters a rider with a question that they are unable to answer, the information is relayed to dispatch, and a person who is proficient in the appropriate language responds if possible. Real-time translation resources are provided through the LanguageLine, a telephone-based service which delivers real-time translations through interpreters. Text translation resources and services are available through MAPA Translations, the agency's language translator. MAPA translates critical documents into languages spoken by the Authority's riding public as well. MWRTA has translation software on its website that allows users to view the site in over one hundred (100) languages, including languages most common to the MWRTA and the MetroWest LEP population. MWRTA can also print out translations, as needed, of all of The Authority's important notices and information. The Authority posts relevant Title VI notices and information in Spanish, Portuguese, Chinese Mandarin, and Russian. This provides The Authority's customers with information that otherwise may not be accessible to them.

Factor 3: The importance of LEP Persons of your Program, Activities, and Services

Task 3 Step 1: Identify your agency's most critical services

MWRTA views transportation as a critical service to everyday life for all people, including those who are LEP. The Authority provides access to jobs, medical, shopping, and educational activities, as well as recreational and social needs.

MWRTA believes that transportation is essential for individuals to experience a full life. Medical trips are the most critical. MWRTA provides access to medical services via its fixed route and demand response (paratransit, Dial-a-Ride, and microtransit [MT]) services. MWRTA certifies individuals for its paratransit and Dial-a-Ride programs regardless of language skills and makes a concerted effort to hire individuals who are proficient in understanding Spanish, Portuguese, Chinese Mandarin, and the LEP languages of the Authority's service area. The Authority recently partnered with MassBay Community College to offer courses in Spanish, Portuguese, and English as a Second Language (ESL) for all employees, in an effort to enhance communication among team members and customers.

Task 3 Step 2: Review input from community organizations and LEP persons

MWRTA is actively engaged in the community and regularly seeks input on needs from various agencies through both formal and informal channels. The agency also receives input from customers via suggestions to drivers, the customer service desk at The Blandin Hub, via email (info@mwrt.com) on the Authority's website, or written directly to the MWRTA at 15 Blandin Avenue, Framingham, MA 01702, Attn: Mark McClanan, Deputy Administrator of Operations. MWRTA's in-person community outreach events are consistent and frequent. Customer feedback through various channels has resulted in the expansion of evening and weekend service.

The MWRTA CATCH App is available for both Apple and Android devices, supporting the Authority's microtransit program Catch Connect. These applications are designed for smartphone use and make it easier than ever to track The Authority's vehicles and find the latest schedule information and book shared rides, provided by MWRTA drivers, to and from areas within the designated service area during weekday and weekend service hours. MWRTA is actively improving app functionality for users of smartphone-based screen-reading software. An additional option for chatting with dispatch via text ensures accessibility for customers who are deaf and hard of hearing. During regular business hours, dispatchers will respond to text messages received via the app in real-time. Customers can now track vehicles, view up-to-date schedules, receive alerts, and even live chat directly with The Authority's dispatchers from their mobile devices.

While the MWRTA has viewed microtransit as a short trip feeder to The Authority's existing fixed route, shuttle, or commuter rail system, the service has been heavily utilized by seniors, people with disabilities, students, and other historically disadvantaged populations. Catch Connect service provides, by default, curb-to-curb transportation with the option of door-to-door service upon request. The Authority has also received feedback regarding the importance of on-time performance and has adjusted schedules to more accurately reflect running times in traffic, and continues to monitor performance.

MWRTA conducts outreach programs throughout the MetroWest service area. Some organizations, such as hospitals, Councils on Aging (COAs), and social justice areas, have LEP outreach staff who have attended The Authority's travel training sessions, where they are introduced to various routes and travel options. MWRTA has held additional outreach events at local, public, and higher education institutions. The Authority collaborates with these institutions to provide Spanish, Portuguese, and Haitian Creole translators for attendees of these events. The Authority has also used Teletalk and text talk for deaf individuals.

Factor 4: Resources available to the Recipient and Cost

Task 4, Step 1: Inventory language assistance measures currently being provided, along with the associated costs.

MWRTA offers language assistance through various resources. As a small agency, low-cost solutions enable us to meet The Authority's LEP goals through our everyday activities.

- Website – The public uses the MWRTA website. It is a conduit for news releases and information about The Authority's services. MWRTA uses Google Translate, a free and commonly used translation software, to allow customers to translate The Authority's website into one of 100+ languages. Available translation options include high-priority languages such as Portuguese and Spanish, the most commonly spoken languages in the MetroWest Region by residents who speak English "not well" or "not at all."
- Written materials – MWRTA provides copies of news releases and other materials, including Title VI and employment regulations, in alternative languages. Information, depending on the use, is posted at the transit hub and onboard the agency's vehicles. MWRTA uses the simplest language possible in posting information, including illustrations when applicable, to make the message clear to riders, including those with limited English skills.
- Workforce - MWRTA strives to hire a diverse workforce. Foreign language skills are a definite plus for employment candidates and are thoughtfully considered in hiring decisions. MWRTA has employees in The Authority's call center who are proficient in Spanish, as well as employees who can also translate for customers who speak Portuguese and Creole. Additionally, the customer service desk, dispatch, and call center are staffed with multilingual representatives and other agency staff who possess additional language skills. Callers requesting language assistance are directed to a representative who can assist them.
- MWRTA LEP CARD, see Appendix D, is similar to those used by the US Census Bureau. When a customer needs language translation services, Authority staff can identify the appropriate language. Should a customer speak a language that we cannot identify, the customer is presented with a card featuring 38 different languages. Customers are instructed to select their language, and we will be able to utilize a two-way translation program to provide communication services.
- Professional Translation Services – MWRTA partners with MAPA Translations to ensure that documents are translated appropriately and to provide real-time translation services when necessary.
- Real-time Language Translation- When a customer service representative is not available who is proficient in the language spoken by a customer, MWRTA will utilize the real-time Language Translation service in order to facilitate communications with the customer.

Task 4, Step 2 – Determine what, if any, additional services are needed to provide meaningful access.

MWRTA actively maintains initiatives to seek more significant outreach opportunities to LEP riders, which make up 8.33% of the Authority's member communities. MWRTA has three (3) employees who are responsible for marketing and communications and are actively conducting outreach throughout the MetroWest Region.

Task 4, Step 3 – Analyze your budget

MWRTA has committed to providing LEP as an inclusive cost of the Authority’s budget. LEP services are integrated into jobs with multiple functions, so the hiring of multi-lingual staff provides no additional cost to the budget, despite the improved value to the system as a whole. Furthermore, computerized translation services, both on the Authority’s website and in the production of flyers, are conducted through free translation programs, resulting in no additional production costs.

Task 4, Step 4 – Consider cost-effective practices for providing language services

MWRTA uses cost-effective practices, including those suggested in the DOT Guidance. Using translation software and relying on the existing skillsets of the Authority’s employees, regardless of job title or function, are two (2) ways we have adopted cost-effective language services. Work is also conducted with community advocates to support outreach activities and continually seek ways to enhance outreach within the Authority’s communities.

Conclusion

MWRTA pays close attention to the LEP needs of the MetroWest Region and continually implements methods to improve outreach to all constituents, including the LEP population. MWRTA uses a combination of in-house and professional skill sets to ensure that the needs of the LEP community are addressed.

Developing an Implementation Plan on Language Assistance

The DOT LEP Guidance [DOT's LEP Guidance | US Department of Transportation](#) recommends that recipients develop an implementation plan to address the needs of the LEP population they serve. The DOT Guidance notes that effective implementation plans typically include the following five elements: identifying LEP individuals who need language assistance, providing language assistance measures, training staff, providing notice to LEP persons, monitoring, and updating the plan.

Task 1: Identifying LEP Individuals who need language assistance

MWRTA has performed a four-factor analysis of the Authority’s LEP population and identified areas and languages with a concentration. The areas where the concentration of LEP populations exceeds the area average are Framingham (16.06%), Marlborough (12.56%), Milford (10.81%), and Hudson (10.61%).

Through the Authority’s outreach and research efforts with local agencies, coupled with data-driven research, the data finds that the most commonly spoken languages by the LEP community are Spanish, Portuguese, and Chinese Mandarin. A table for each community by the number of LEP speakers by language and the percentage of the population is included in this document.

Task 2: Language Assistance Measures

MWRTA utilizes a variety of language assistance tools to communicate with the LEP community. These tools include a website translation software that allows the customer or agency staff to translate information regarding the Authority's system, as well as written notices that are posted in various languages in a variety of places to reach the intended audience, and employee translators who are available to answer questions about the system. The agency also has the MWRTA LEP CARD, which is kept at the reception desk for public use.

If a person indicates that they speak a language that we can not translate with staff resources, we will use the Language Line services mentioned previously to communicate with the individual. The agency also partners with a professional translation service to translate critical documents and provide real-time translations.

MWRTA protocol for a person who needs language assistance on the phone; the person receiving the call will determine the language to the best of their ability, then forward the call to the person and or service that best meets the caller's needs. It should be noted that MWRTA phone lines are staffed by multi-lingual individuals who speak Portuguese and Spanish. Furthermore, the paratransit call center has bilingual operators to assist in scheduling paratransit trips. MWRTA has received written communications in Spanish, Portuguese, and Chinese Mandarin. As a result of a system-wide survey, MWRTA used Spanish, Portuguese, and Chinese Mandarin-speaking staff or MAPA Translations to translate the comments. If a response was requested, the customer would receive a response in the same language as the original communication.

The MWRTA has a dedicated Central Reservations team, comprised of a diverse group of compassionate reservationists who provide excellent customer service. The MWRTA call center is unique in that many of the reservationists have used the service, and more than 50% of the staff members are individuals with disabilities. Therefore, the call center staff can relate to the passengers when they call in to book their trips.

The MWRTA partners with the Massachusetts Commission for the Blind (MCB) to provide software to Central Reservations, enabling accessibility for employees who are blind and/or visually impaired.

MWRTA's contracted service drivers who encounter Limited English Proficiency (LEP) passengers with questions they cannot answer are instructed to use the MWRTA LEP CARD and to radio into dispatch so that a staff interpreter can respond to the passenger's request. Our operating company indicates that LEP riders use the system frequently. MWRTA also partners with a professional translation company, should additional translation assistance be required. The agency can easily access these services.

Task 3: Training Staff

Operating staff and in-house staff are trained on proper procedures for responding to LEP information requests. Discussions with call center and operating employees indicate that working with LEP

populations is a regular occurrence. Customer-facing employees receive extensive training on how to communicate effectively with LEP individuals.

Task 3, Step 1 – Identify agency staff who are likely to come into contact with LEP persons, as well as management staff. The agency staff who most often interact with LEP populations are the drivers. Call takers and the customer service desk also interact with LEP people on a regular basis. MWRTA staff are educated in LEP protocol, which involves transferring the call to someone who speaks the language and can best assist the customer.

Task 3, Step 2: Identify Existing Staff Training Opportunities. New employees are trained on LEP protocols and customer courtesy upon joining the transit authority. Employees who have questions about LEP protocol in the course of their jobs are directed to ask their supervisor for clarification.

Task 3, Step 3 – Design and Implement LEP Training for Agency Staff. LEP training is included as part of the hiring process for the MWRTA. LEP is also covered in the customer service component of training. Common sense prevails, and when we receive calls from a person who has LEP, we find the person who can most easily converse both in terms of content and language skills. For this Title VI Plan update, staff were apprised of the document and questioned to determine their day-to-day experience with LEP and the protocols they use to address LEP needs. MWRTA continues to collaborate with The Authority's problem-solving employees to identify additional ways to enhance community outreach. The agency has also partnered with a professional translation service to ensure that the needs of the LEP community are addressed in the event that an in-house interpreter is not available.

Task 4: Providing Notice to LEP Persons

Notices in dominant LEP languages are posted at the main transfer hub of the MWRTA. Passengers frequently visit the transfer hub to obtain information about services, add value to their passes, and register for reduced fare ID cards. The Blandin Hub is the primary transfer center for the majority of bus routes in the MWRTA system. Routes 2, 3 & 7 primarily transfer from the Intermodal at the Framingham Commuter Rail Station Banana Lot. In addition to posted notices, multi-lingual staff work at The Authority's customer service desk and assist customers at the Hub, as well as those who call in. Staff at the Banana Lot are also LEP-trained to assist customers there. If any language interpreter assistance is needed, the staff at the Banana Lot is instructed to contact the Blandin Hub. MWRTA also posts important notices on The Authority's buses to ensure that all riders have direct notification of important issues or news affecting MWRTA, including information regarding Title VI rights.

The agency maintains customer bulletin boards and works with the media and a local radio station to provide MWRTA information to the public. MWRTA has collaborated with Spanish- and Portuguese-speaking media, as well as the local public television network, to enhance outreach to the LEP community. The Authority also shares information through various social media platforms, including Facebook, X (formerly Twitter), and Instagram.

Task 5: Monitoring and Updating the LEP Plan

The LEP population is part of the cumulative number of LEP speakers within the service area as a whole who require safe threshold treatment concerning the provision of information in Spanish, Portuguese, Chinese Mandarin, and Russian.

Provision: Notifying Beneficiaries of their Rights under Title VI

Circular Reference: Chapter IV, Part 5
Regulations or Reference: 49 CFR 21.9(d)
Reporting Requirement: Notice of compliance with Title VI and public procedures to file a discrimination complaint

In order to comply with 49 CFR Section 21.9(d), recipients and subrecipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients and subrecipients that provide transit service shall disseminate this information to the public through measures that can include but shall not be limited to posting information on the agency's website.

- a) Contents: the notice shall include:
1. A statement that the agency operates programs without regard to race, color, or national origin.
 2. A description of the procedures that members of the public should follow in order to request additional information on the recipient's or subrecipient's nondiscrimination obligations.
 3. A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient or subrecipient.
- b) Effective Practices for Fulfilling Notification Requirements: In complying with the above requirements, recipients, and subrecipients should keep the following guidance in mind:
1. Dissemination. Agencies may inform the public of their rights under Title VI through such measures as posters, comment cards, or flyers placed at stations and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's or subrecipient's discretion.
 2. General Notification. Agencies may include a statement of nondiscrimination on the basis of race, color, or national origin as part of a broader statement of its commitment to nondiscriminatory service. This broader statement can also include a commitment to nondiscrimination based on characteristics not covered by Title VI, such as age, gender, and disability.
 3. Document translation. Notices dealing with a recipient's or subrecipient's Title VI obligations and complaint procedures should be translated into languages other than English, as needed, and consistent with the DOT LEP Guidance.
 4. Subrecipients. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the recipient; however, subrecipients should notify their beneficiaries that they may file discrimination complaints directly with the subrecipient.

MWRTA features Title VI information on its website <http://mwrta.com/information/policies>. MWRTA's website serves as the primary portal for customers and employees, providing schedules, real-time bus location information, news, and updates related to the transit authority. MWRTA's website includes a link to Google Translate, a common translation software. Google Translate enables site users to translate information into over 100 languages, including Portuguese and Spanish, the most commonly used languages in the MetroWest Regional service area, aside from English.

While MWRTA believes that The Authority's website reaches many of its customers and employees, we recognize the need to provide additional outreach measures for those unable to access information via the internet. Title VI information in key languages is posted at The Authority's main transfer Hub located at 15 Blandin Avenue in Framingham. At the Hub, many of The Authority's customers transfer between buses, add value to their passes, or apply for certification for various programs. Title VI information is also posted in employee kitchens for both contracted and directly employed MWRTA employees.

MWRTA includes Title VI information in the new hire orientation for direct hires. This information is available to employees, contracted employees, and customers in the preferred language of the individual.

Provision: Inclusive Public Participation

Circular Reference:	Chapter IV, Part 9
Regulations or Reference:	DOT Order 5610
Reporting Requirement:	Summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority persons had meaningful access to those activities.

In order to integrate into community outreach activities, considerations expressed in the DOT Order on Environmental Justice and the DOT LEP Guidance, recipients and subrecipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

a) Effective practices for Fulfilling the Inclusive Public Participation Requirement.

Recipients and subrecipients have wide latitude to determine how, when, and how often specific public involvement measures should be implemented and what measures are most appropriate. Recipients should make these determinations based on the composition of the population affected by the recipient's action, the type of public involvement process planned by the recipient, and the resources available to the agency. Inclusive efforts to involve minority, low-income people, and LEP populations in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and low-income people from effectively participating in a recipient's decision making process.

Effective practices include:

- 1) Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
- 2) Providing opportunities for public participation through means other than written communication, such as telephone and in-person interviews.
- 3) Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- 4) Using different meeting sizes and formats or varying the type and number of news media used to announce public participation opportunities so that communications are tailored to the particular community or population.
- 5) Implementing DOT's policy guidance concerning the recipient's responsibilities to LEP persons to overcome barriers to public participation.

As a member of the Boston Region Metropolitan Planning Organization (MPO), the MWRTA directly participates in the continuing, cooperative, and comprehensive (3C) transportation planning process for the Boston region of Massachusetts. Since November 2024, the Authority has shared a seat on the MPO's 22-member board with the Cape Ann Transportation Authority (CATA). In this capacity, MWRTA advocates for the public transit needs of its 16 member communities. MWRTA personnel regularly collaborate with the region's Central Transportation Planning Staff (CTPS) to develop projects and services designed to enhance safe, reliable, and affordable public transportation services throughout the MetroWest region.

In line with the Boston Region MPO's Public Engagement Plan (PEP), MWRTA undertakes a variety of initiatives designed to ensure continuous and meaningful opportunities for the public to influence transportation decision-making in the region. The Authority holds regularly scheduled meetings that are open to the public. These meetings include Advisory Board meetings to discuss policy and oversight, as well as customer outreach meetings within the RTA member communities and public office hours at the Blandin Hub to solicit input from the riding community on their experience and how we can improve The Authority's services. Board members are chief elected officials from each community or their designee. Each Board meeting is held at the MWRTA Hub facility during hours in which the transit network is running, so that system users can easily access the meetings. Meetings are also accessible to board members and the public remotely via the Zoom platform.

Transitions Travel Training: MWRTA has implemented a Travel Training program to assist and train individuals regarding how to safely ride all MWRTA services. The program provides comprehensive instruction to familiarize the individual with transportation in the MetroWest area. The program not only provides a marketing and outreach opportunity for new and existing customers, but it also provides a feedback forum for MWRTA staff to hear how we are doing and how we can improve The Authority's service. Travel Training sessions have been held at public housing authorities, senior centers, health fairs, and disability advocacy organizations. The training is held during office hours when the transit system is operating and at accessible locations. The subsidized locations help us to reach lower-income individuals who may qualify for subsidies due to income constraints.

Individuals learn:

- How to read the MWRTA Fixed Route bus schedules
- How to read the MWRTA Fixed Route System Map
- How to use Fare Media
- Additional travel training techniques needed to travel on the bus safely and independently
- Information and training techniques helpful in using demand services

This program is an excellent opportunity to continue learning about the MWRTA Fixed Route bus system. It is the first step to preparing the rider for successful and independent travel experiences in the future.

Additionally, the MWRTA participates in a variety of community events to further engage with current and potential riders, as well as to raise awareness about public transportation in the MetroWest region. The MWRTA believes that attending events such as the MetroFest, the MetroWest Visitors Bureau's signature event, which showcases the richness and diversity of the region's offerings, including public transit, benefits the agency, allowing the MWRTA to connect with the diverse population of event attendees. The agency has also been involved with health fairs, Chamber of Commerce events, community engagement projects, etc., to continue to reach people or businesses and agencies serving individuals who would benefit from public transportation. The MWRTA collaborates closely with the MetroWest Center for Independent Living, the South Middlesex Opportunity Council (SMOC), and the 495/MetroWest Partnership to inform future workforce transportation needs. Human Resources from various companies and agencies also work with the MWRTA to better understand employee transit needs and then have the opportunity to meet those needs in the MetroWest Region.

It has been a priority of the MWRTA to identify social injustice areas within the 16 communities we serve and perform more focused outreach in those areas. For example: assisting the Framingham Schools with travel training for students to access The Authority's fixed route system as a way to get to school, as a result of the shortage of bus drivers within the MetroWest region.

One step required to advance health equity is to "change policies, laws, systems, environments, and practices to eliminate inequities in the opportunities and resources needed to be as healthy as possible." These opportunities include, but are not limited to, employment at a fair wage, access to good education, safe and affordable housing, clean and safe environments, and quality medical care. The Authority is committed to connecting community members, especially those who are transit-dependent, to education, employment, healthcare, and social/recreational opportunities via its fixed routes and shuttles, demand response/MicroTransit services, and hospital shuttles.

MWRTA has also implemented several environmental accomplishments that assist adjoining neighborhoods by reducing pollution through its compressed natural gas (CNG) buses, solar PV canopy, and water reclamation systems. MWRTA is committed to health equity and demonstrates this in its business practices.

Ethnicity: Based on census data, the two largest MetroWest cities, Framingham and Marlborough, along with the Town of Natick, have a combined ethnic population of 18,803 Hispanic residents, 9,298 Asian residents, and 5,621 Black residents as of 2024. Also, MetroWest is home to a growing number of seniors and people with disabilities, many of whom are entirely dependent on public transportation. All of The Authority's vehicles are wheelchair accessible, and we operate a comprehensive door-to-door paratransit service for

qualified seniors and people with disabilities. The MWRTA has routes throughout EJ neighborhoods within the MetroWest region, and we offer a Boston Hospital shuttle service for qualified passengers, which stops at eight different Boston-area hospitals. In addition, MWRTA provides fixed route services with stops at the following hospitals: MetroWest Medical Center in Framingham and Natick, Newton/Wellesley Hospital, Milford Regional Hospital, and Marlborough Hospital. By providing transportation to these medical facilities, MWRTA helps further promote health equity within the MetroWest Region.

Social Media: MWRTA maintains X (@MWRTA), Facebook (@MetroWestRTA), and Instagram (@MetroWestRTA) accounts, which provide regular updates on MWRTA’s programs, events, announcements, schedule revisions, job postings, and additional information. These accounts are a popular source of information for riders and other local agencies/businesses and have led to more coverage and engagement from local media sources. These accounts allow for an additional source of communication between riders and MWRTA, where riders can ask questions or give feedback directly to MWRTA reps. MetroWest Regional Transit Authority also has a LinkedIn company page www.linkedin.com/company/MetroWest-regional-transit-authority

MWRTA Consumer Feedback Office Hours: The MWRTA will conduct outreach in every community (some months may have multiple sessions) to hold consumer feedback office hour sessions in each of The Authority’s 16 member communities. The sessions will be open to the public and will be advertised on The Authority’s website, social media, and in local newspapers. Any session cancellations will be posted in these locations. Consumers of Fixed Route and Paratransit service will be able to ask questions, provide comments, and address any concerns to MWRTA management related to the service provided by the MWRTA. All addressed concerns will be posted on The Authority’s website after the session is completed. If unable to attend, residents will be able to submit questions and concerns to Mark.McClanan@mwrt.com. The Authority will address questions submitted.

Provision: Demographic Data Collection

Circular Reference:	Chapter V, Part 1
Regulations or Reference:	49 CFR 21.9(b)
Reporting Requirement:	Demographic maps and charts prepared since the last decennial census, results of consumer surveys that include demographic information or demographic information on beneficiaries through locally developed procedures.

1. Requirement to Collect Demographic Data. In order to comply with 49 CFR Section 2.9(b), recipients to which this chapter applies shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal Financial Assistance. FTA recommends that recipients fulfill this requirement by implementing one or more of the following three options:
 - a) Option A: Demographic and Service Profile Maps and Charts. Recipients may prepare demographic and service profile maps and charts. These maps and charts will help the recipient determine whether transit service is available to minority and low-income populations within the

recipient's service area. Maps and charts should be prepared after each decennial census and prior to proposed service reductions or eliminations (per the instructions of Section 4 of this Chapter). These maps may be prepared using geographic information systems (GIS) technology, although recipients without access to GIS may prepare maps in alternate formats. The Federal Transit Administration (FTA) recommends that recipients provide the following maps and charts:

- 1) A base map of the agency's service area that includes each census tract of traffic analysis zone, major streets and highways, fixed transit facilities (including the alignment of fixed guideways and transit stations, depots, maintenance, and garage facilities, and administrative buildings) and major activity centers or transit trip generators (major activity centers and transit trip generators can include but are not limited to, the central business district, outlying high employment areas, schools, and hospitals). This map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years.
 - 2) A demographic map that plots the above information and shades those census tracts or traffic analysis zones where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population of the service area as a whole. Transit agencies may elect to produce maps that highlight separately those areas with a predominantly minority population, a predominantly low-income population, and a population that is both predominantly minority and low-income if specialized maps would assist the agency in determining compliance with Title VI. Transit agencies may also elect to produce additional maps showing the presence of individual minority populations if this information would assist the agency in determining compliance with Title VI.
 - 3) A chart for each Census tract or traffic analysis zone that shows the actual numbers and percentages for each minority group within the zone or tract and the total population for each zone. The chart should also show the total number and percentage of low-income people within each zone or tract. Those tracts where the total minority population percentage and the total low-income population percentage exceed the system-wide average for the agency's transit service area should be highlighted in the chart.
- b) Option B: Survey information on Customer Demographics and Travel Patterns. Recipients may collect information on the race, color, national origin, income and travel patterns of their riders. FTA recommends that recipients collect the following information (recipients may request additional information from their riders, as appropriate, or request different information that is more applicable to the type of service they provide):
- 1) Information on riders' race, color, and national origin.
 - 2) Whether the rider speaks or understands English "not well" or "not at all."
 - 3) Information on riders' income or income range.
 - 4) The mode of transportation service that the rider uses most frequently (when available).
 - 5) The frequency of transit usage.
 - 6) The typical number of transfers made.
 - 7) The fare payment type and media most frequently used (when applicable).
 - 8) Rider's automobile availability.

- 9) Rider's opinion of the quality of service they receive (this could include questions such as satisfaction with the system, willingness to recommend transit to others, and value for the fare paid).

In administering the above option, grantees should keep the following guidance in mind:

- a) Timing. The information recommended in Section 1.b.(1) can be integrated into customer surveys routinely employed by transit agencies and can be collected at the time that such surveys are routinely performed.
- b) Language Access. The recipient should take steps to translate customer surveys into languages other than English or to provide interpretation services in the course of conducting customer surveys consistent with the DOT LEP guidance.
- c) Option C: Locally Developed Alternative. Recipients may modify the above options or develop their own procedures to collect and analyze demographic data on their beneficiaries. Any locally developed alternative shall meet the expectation of 49 CFR Section 21.9(b).

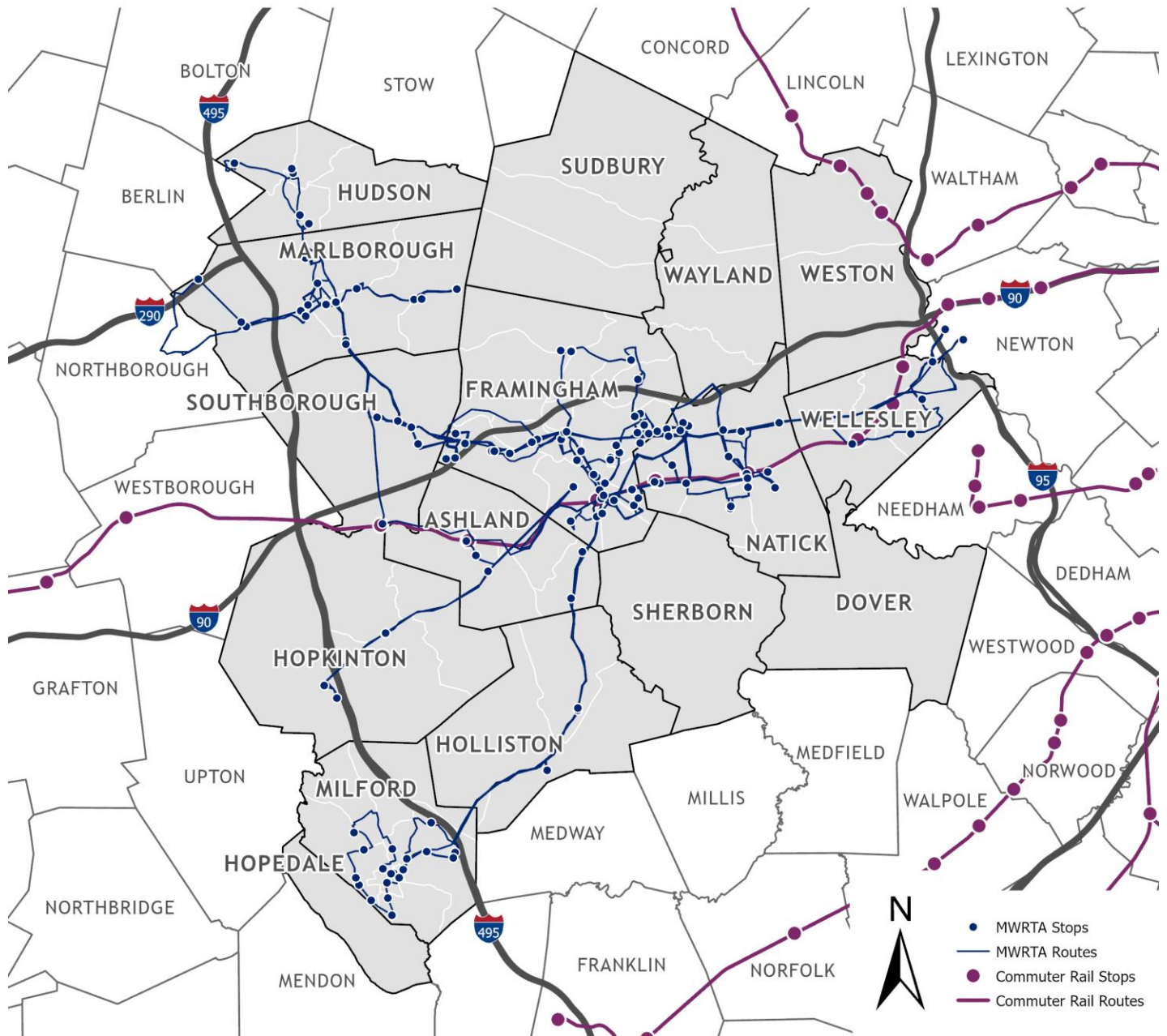
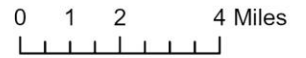
Option C – MWRTA had the following maps and data chart created in September 2019 to document demographics in The Authority's service area per the suggested Option A criteria.

The following maps display demographic data for the MWRTA service area in relation to Title VI requirements.

Map 1 provides a base map of MWRTA services. Map 2 is a demographic base map that utilizes Map 1 as its base map and highlights census tracts where individuals live below the poverty level. Map 3 uses Map 1 as a base and highlights census tracts where the percentage of minorities exceeds the average minority population of the service area. Map 4 uses Map 1 as a base map and highlights census tracts, where the percentage of LEP population exceeds the average LEP of the service area as a whole. Following the demographic maps, MWRTA has included a table with the number and percentage of low-income, minority, and LEP populations. Tracts, where the percentages of these characteristics exceed the service area as a whole, are highlighted.

MetroWest Regional Transit Authority

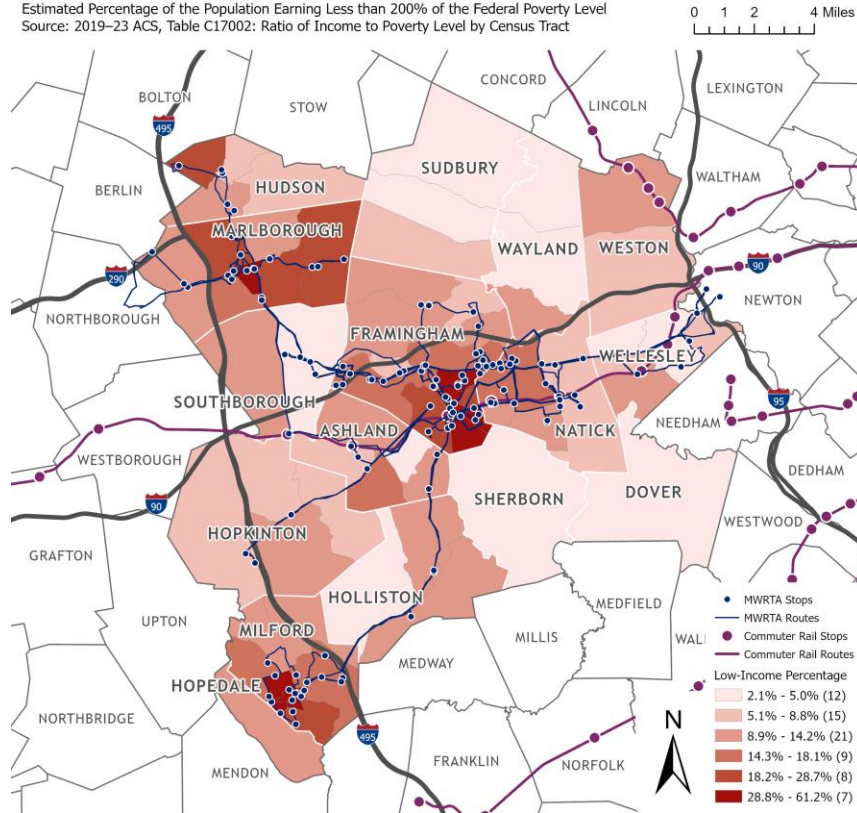
Service Area, Census Tracts, Adjacent Communities, Interstate Highways
 MBTA Commuter Rail, and MWRTA Bus Services



- MWRTA Stops
- MWRTA Routes
- Commuter Rail Stops
- Commuter Rail Routes

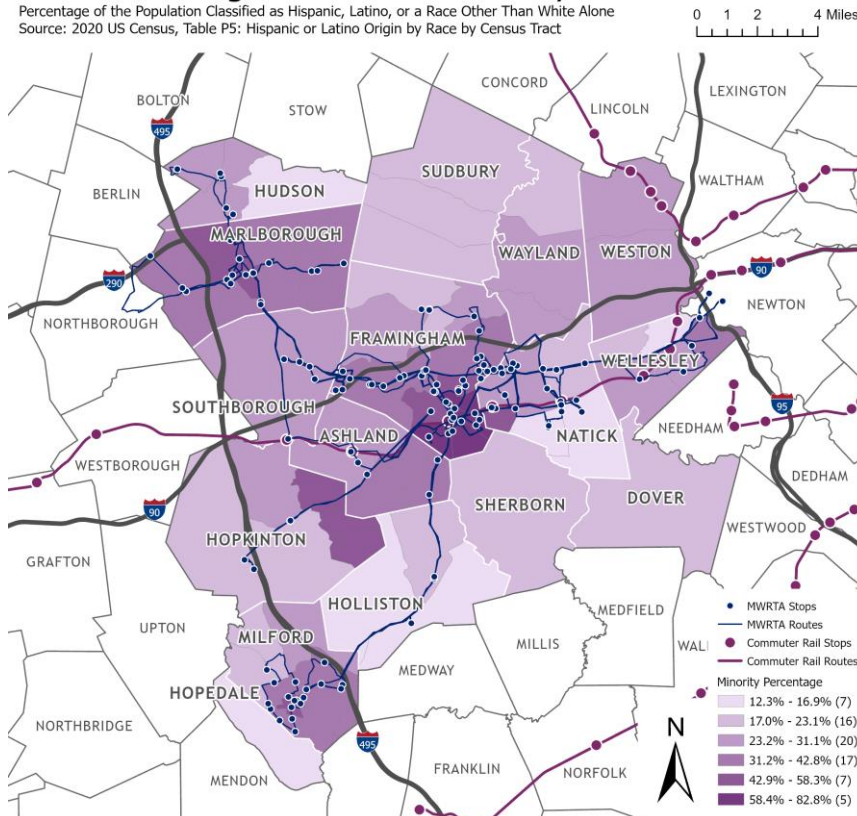
MetroWest Regional Transit Authority

Estimated Percentage of the Population Earning Less than 200% of the Federal Poverty Level
 Source: 2019–23 ACS, Table C17002: Ratio of Income to Poverty Level by Census Tract



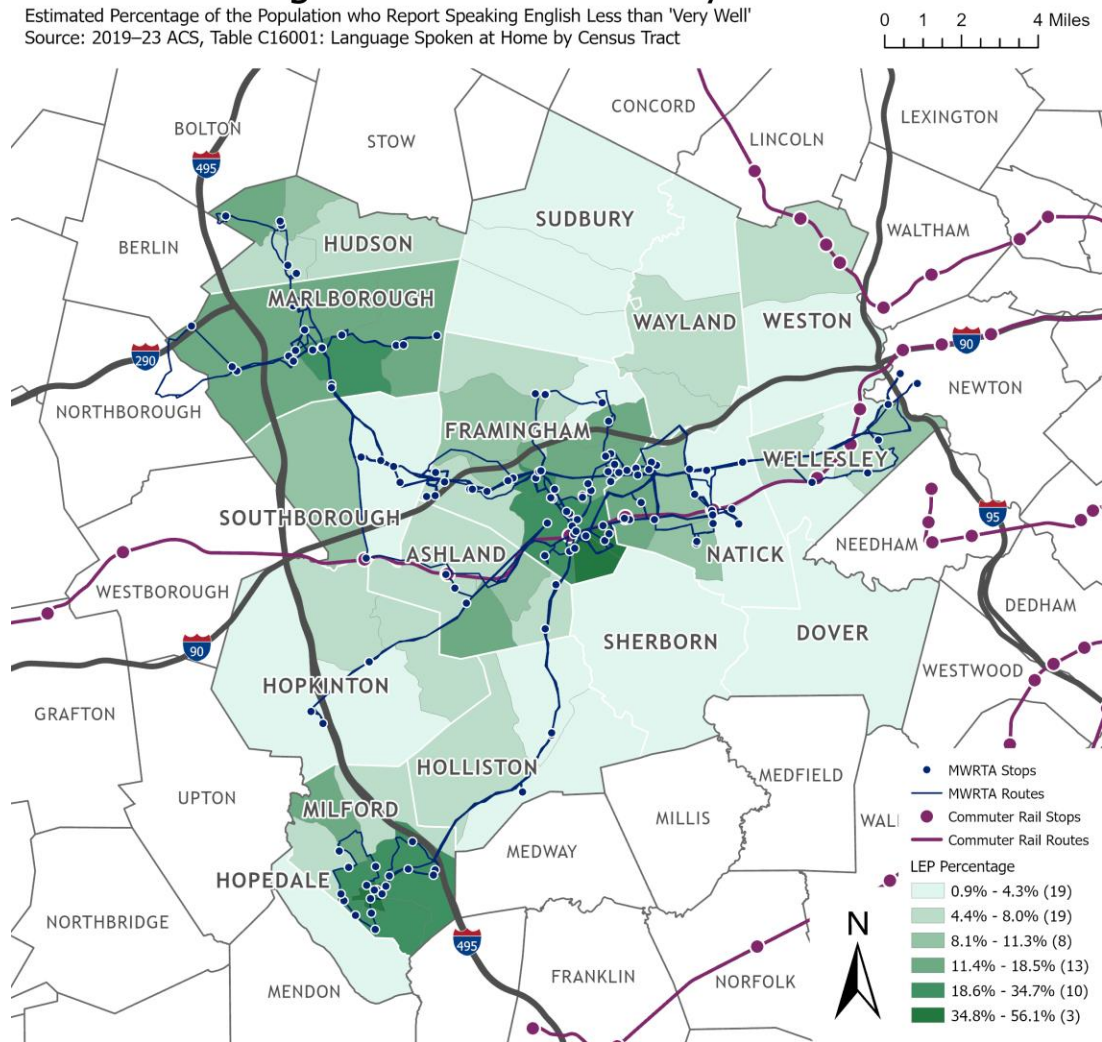
MetroWest Regional Transit Authority

Percentage of the Population Classified as Hispanic, Latino, or a Race Other Than White Alone
 Source: 2020 US Census, Table P5: Hispanic or Latino Origin by Race by Census Tract



MetroWest Regional Transit Authority

Estimated Percentage of the Population who Report Speaking English Less than 'Very Well'
 Source: 2019-23 ACS, Table C16001: Language Spoken at Home by Census Tract



Census ID	Population	Low Income	Minority	Trips Before	Trips After
250173222001	2038	6.6%	22.1%	16065	16065
250173833001	2061	6.6%	76.9%	66310	66310
250173833002	1680	6.6%	20.5%	22925	22925
250173871002	2060	1.8%	16.7%	0	0
250173872012	859	15.3%	14.8%	6595	6595
250277441023	1665	10.8%	3.0%	4195	4195
250277442022	1450	3.2%	62.1%	8900	8900
250173837001	697	10.5%	26.4%	0	0
250173851023	1990	0.4%	19.8%	18930	18930
250173201022	1290	9.3%	22.3%	7150	7150
250173211001	2735	8.9%	38.3%	7730	7730
250214431041	2458	9.6%	5.9%	0	0
250173826021	1006	0.0%	47.9%	8565	8565

250173832004	1839	18.1%	63.0%	9115	9115
250173835011	1362	7.9%	51.0%	31175	31175
250173835022	684	0.0%	60.5%	16225	16225
250173838002	897	6.3%	32.8%	10975	10975
250173839031	941	23.6%	51.6%	10975	10975
250214081032	1999	0.0%	16.3%	0	0
250277411012	2032	1.2%	19.7%	11730	11730
250173832001	1041	33.0%	76.1%	75425	75425
250277411022	1781	3.4%	16.2%	8275	8275
250277443001	1369	3.1%	67.9%	8900	8900
250173838005	900	8.4%	29.8%	0	0
250277411023	1493	1.3%	40.5%	0	0
250173201061	2016	2.8%	10.2%	15565	15565
250214043011	1496	2.7%	9.8%	0	0
250214421041	1867	5.2%	35.5%	0	0
250277151001	2557	3.6%	16.1%	0	0
250277171001	3311	4.7%	10.0%	14870	14870
250173224002	1607	3.7%	18.4%	16065	16065
250173834021	1866	14.1%	56.5%	20090	20090
250277442012	1245	0.0%	63.7%	8390	8390
250173826023	1111	4.8%	6.7%	16150	16150
250173834022	1972	17.5%	62.2%	14220	14220
250173839021	2402	3.1%	19.2%	7905	7905
250173840031	0			19435	19435
250173861001	958	4.1%	24.5%	0	0
250173201072	2640	5.3%	72.7%	0	0
250173213013	1374	6.5%	57.1%	36770	36770
250173744005	810	0.0%	45.3%	0	0
250173824003	1914	5.7%	19.4%	7290	7290
250173824004	625	22.6%	4.2%	7290	7290
250173748003	1162	3.3%	28.4%	9770	9770
250173821005	746	6.6%	26.0%	18080	18080
250214042014	606	3.0%	15.2%	9770	9770
250173838001	2245	2.7%	28.4%	10975	10975
250277442024	1393	4.2%	13.4%	27480	27480
250277451003	1635	3.2%	7.8%	8390	8390
250173835021	1567	0.3%	43.5%	46410	46410
250173840033	2827	14.4%	61.9%	25405	25405
250173840034	1324	7.6%	22.4%	15125	15125
250277411024	1653	3.3%	35.2%	8415	8415
250277443004	928	21.1%	26.4%	8900	8900
250214034005	498	0.0%	22.5%	0	0
250214043012	905	0.0%	9.1%	0	0

250214043023	1077	3.1%	37.5%	9770	9770
250173821003	899	0.0%	14.5%	10025	10025
250173214001	2383	8.2%	30.2%	7220	7220
250173216003	1186	1.3%	20.4%	0	0
250173825003	1603	5.9%	2.6%	26355	26355
250173211004	1576	1.4%	39.3%	4670	4670
250173214002	2053	1.9%	44.0%	7220	7220
250173831012	1905	25.7%	80.6%	87490	87490
250173835012	1512	39.1%	53.3%	20525	20525
250173839042	566	0.0%	44.3%	10975	10975
250173852033	1595	4.8%	50.2%	24315	24315
250277401022	1395	3.4%	32.6%	0	0
250277444003	1585	18.4%	71.5%	8390	8390
250173201051	2464	3.7%	22.5%	15565	15565
250173201064	1304	4.5%	21.1%	15565	15565
250173213012	2066	29.2%	39.0%	41000	41000
250173216002	1204	8.0%	51.7%	7985	7985
250173631041	2303	9.4%	35.7%	4590	4590
250173823001	957	8.2%	31.3%	9840	9840
250214043014	1145	1.0%	32.9%	0	0
250214041002	1215	3.5%	44.6%	9770	9770
250173213011	1210	38.9%	53.5%	41000	41000
250173632011	1004	6.9%	18.7%	0	0
250173223004	1401	7.1%	7.3%	9180	9180
250173838003	756	5.2%	37.2%	0	0
250173834011	2126	14.9%	76.9%	87490	87490
250173840032	1324	1.0%	13.4%	27670	27670
250277441032	1525	10.6%	16.5%	0	0
250277442023	1135	1.7%	26.3%	27480	27480
250173652021	2636	9.2%	26.7%	4670	4670
250173836001	1787	2.8%	44.5%	22310	22310
250173836004	1627	7.9%	15.6%	36860	36860
250173839022	1635	4.1%	29.7%	10975	10975
250173851011	2978	3.4%	37.8%	15565	15565
250173851022	1477	15.0%	28.8%	7150	7150
250277443003	808	9.8%	36.9%	8900	8900
250173872011	739	5.3%	2.6%	6595	6595
250173672004	2255	3.9%	17.3%	0	0
250173826011	1250	2.7%	20.5%	8565	8565
250173831022	3357	34.3%	87.1%	15385	15385
250173871001	1049	4.1%	9.2%	3060	3060
250173852032	1803	1.5%	16.7%	24315	24315
250277441043	947	0.0%	14.9%	0	0

250277451002	1188	6.7%	21.0%	8390	8390
250173215003	2014	8.4%	53.5%	41000	41000
250214042021	1664	2.2%	23.5%	1100	1100
250173852041	3472	2.0%	43.8%	16265	16265
250214081031	1420	7.9%	7.3%	0	0
250277444001	1228	10.3%	45.9%	8900	8900
250173834012	733	5.0%	11.1%	34775	34775
250173872013	1349	0.0%	21.4%	6595	6595
250277444002	1677	27.3%	14.5%	4195	4195
250173826022	1618	20.2%	15.9%	7800	7800
250173201023	1913	4.8%	16.5%	3575	3575
250173631043	1774	0.0%	41.9%	4590	4590
250214042023	1937		46.4%	9770	9770
250173212002	2561	0.0%	41.8%	20345	20345
250173822001	1603	8.1%	8.3%	19610	19610
250173824002	1400	0.0%	18.0%	0	0
250214044004	1926		58.2%	9770	9770
250214421032	1377	2.0%	29.3%	0	0
250173212003	1981	1.3%	32.5%	7730	7730
250173221003	942	1.2%	25.5%	0	0
250173822002	1274	2.1%	3.5%	9840	9840
250173825004	1443	13.2%	44.7%	25255	25255
250214421043	1462	11.6%	10.6%	0	0
250214431051	2167	4.1%	15.3%	0	0
250173224001	1913	5.8%	17.1%	16065	16065
250173826013	902	1.3%	67.8%	16150	16150
250173826024	1110	0.2%	23.7%	55340	55340
250173831011	2272	14.3%	71.7%	87490	87490
250173744004	1956	12.6%	46.8%	9770	9770
250214034001	3031	3.0%	15.2%	0	0
250214421051	2144	3.9%	22.2%	4080	4080
250173632022	1312	0.0%	37.8%	4590	4590
250173826014	1847	3.6%	70.0%	7035	7035
250173835013	1236	3.0%	46.3%	28030	28030
250173852011	2871	3.9%	38.3%	7150	7150
250277411013	1756	1.8%	20.5%	18220	18220
250173213022	1785	7.7%	17.6%	15055	15055
250173836002	467	13.9%	80.9%	52790	52790
250173832003	1691	14.6%	89.7%	75425	75425
250173826012	662	0.0%	56.6%	0	0
250173851021	1295	2.2%	23.6%	7150	7150
250173872022	1028	0.2%	15.5%	0	0
250214035022	1996	1.6%	19.1%	0	0

250173211002	1549	14.4%	42.4%	7730	7730
250173821004	795	12.8%	27.7%	9690	9690
250214043022	640	2.0%	54.5%	0	0
250214041001	1959	4.6%	38.3%	9770	9770
250214043021	1834	6.2%	22.5%	9770	9770
250173201063	2250	3.3%	29.7%	7150	7150
250173212001	2590	11.1%	54.6%	20600	20600
250173216005	2565	13.5%	67.9%	20600	20600
250173743002	1711	1.4%	16.7%	9770	9770
250214042012	1038	1.9%	22.2%	0	0
250277151002	1165	1.6%	15.1%	0	0
250173216001	1255	7.3%	47.8%	0	0
250173822004	1123	2.7%	19.7%	22415	22415
250173825002	1474	18.1%	25.8%	8310	8310
250173223003	1492	7.2%	58.9%	9180	9180
250277441041	2107	1.7%	37.8%	4195	4195
250173823002	2482	0.9%	13.0%	7290	7290
250214041003	1201	0.7%	12.8%	9770	9770
250214042013	1050	1.4%	21.6%	0	0
250214042022	977	4.9%	15.3%	9770	9770
250173821002	776	2.4%	14.8%	0	0
250173822003	1229	0.8%	14.9%	9840	9840
250173825001	1177	14.9%	50.0%	10940	10940
250214042011	1304	1.4%	19.9%	0	0
250214043015	992	0.0%	45.2%	0	0
250173224003	1372	0.7%	7.3%	0	0
250173223002	1530	4.6%	7.9%	16065	16065
250173672002	815	3.7%	10.8%	0	0
250173837003	2760	6.6%	36.2%	10975	10975
250173839043	1211	6.0%	3.1%	10975	10975
250277441021	2257	16.9%	24.5%	4195	4195
250173223001	1420	16.1%	23.6%	16065	16065
250173832002	1654	5.5%	50.8%	24570	24570
250173836003	2165	8.8%	40.2%	5105	5105
250173839044	2162	16.0%	39.3%	15645	15645
250173852031	1213	10.1%	30.7%	24315	24315
250214081043	1908	0.5%	19.0%	0	0
250277451001	3201	3.8%	5.8%	4195	4195
250277441031	1438	0.0%	22.7%	0	0
250277411021	779	24.5%	42.7%	16690	16690
250214044001	984	18.3%	17.7%	9770	9770
250173823004	1874	2.6%	8.3%	5250	5250
250173824001	1336	3.4%	19.8%	9840	9840

250214044003	1052	0.0%	15.0%	0	0
250173831021	2117	18.3%	81.8%	87490	87490
250173872015	888	3.3%	57.8%	0	0
250214081042	1229	3.9%	8.6%	0	0
250277441022	1582	3.4%	23.7%	0	0
250277442021	1290	6.2%	43.6%	8390	8390
250173213021	1514	9.0%	61.8%	11230	11230
250173215004	1642	19.4%	28.8%	7220	7220
250173216004	909	0.3%	26.8%	0	0
250214042024	1090	2.3%	38.4%	9770	9770
250173743003	944	0.0%	23.4%	9770	9770
250173748002	2408	5.4%	27.5%	9770	9770
250173652023	1027	0.0%	16.4%	0	0
250173661005	1023	5.6%	14.4%	0	0
250173835023	1712	18.9%	36.7%	36860	36860
250173839041	974	2.6%	13.2%	0	0
250277441042	1637	3.4%	28.1%	4195	4195
250277443002	1106	5.0%	57.2%	8900	8900
250173838004	1305	4.9%	33.1%	10975	10975
250173861003	1501	0.0%	21.3%	0	0
250173748001	1503	0.9%	32.8%	0	0
250214044002	1272	4.3%	21.9%	0	0
250214044005	1304	1.5%	18.3%	9770	9770
250173839032	1586	1.1%	41.7%	0	0
250173215001	1997	10.4%	54.5%	11230	11230
250173837004	1117	2.1%	34.3%	0	0
250173871004	680	4.3%	18.8%	6595	6595
250277401021	2655	1.2%	16.9%	0	0
250173222002	2343	3.2%	19.5%	16065	16065
250173837002	619	2.5%	34.6%	20525	20525
250173872021	1425	0.0%	14.9%	3060	3060
250173872023	2158	3.9%	15.1%	3060	3060
250277411011	947	1.8%	23.8%	9805	9805
250277442011	1932	9.0%	35.0%	4195	4195
250173632013	743	1.1%	28.4%	4590	4590
250173215002	1576	5.6%	17.9%	0	0
250173821001	1710	0.3%	30.8%	10025	10025
250173212004	1008	0.0%	16.3%	0	0
250173839023	1883	0.0%	43.2%	0	0
250173840041	1449	2.2%	39.4%	15125	15125
250173871003	588	5.8%	3.9%	6595	6595
250173872014	2141	2.1%	6.8%	0	0

Provision: Service Standards

Circular Reference:	Chapter V, Part 2
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	System-wide Service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security)

- 1) Vehicle load – Vehicle load can be expressed as the ratio of passengers to the number of seats on a vehicle during a vehicle’s maximum load point. Vehicle load is generally measured at peak and off-peak times and on different modes of transit. When recipients observe that vehicle load on certain routes is consistently exceeding its service standard, they should consider adding additional vehicles or expanding the capacity of vehicles serving that route. Recipients may set different vehicle load standards for peak and off peak times and for different modes of transit service.

The MWRTA is a suburban transit system which has experienced growing systemwide ridership. The fixed route fleet is currently comprised of 37 16-passenger buses and 6 12-passenger buses, and ridership on the vehicles is such that capacity constraints occur inconsistently on a few prime-time commuter runs. MWRTA has also acquired larger Fixed Route 30-foot vehicles, which are now being rolled out to revenue service to address capacity issues. MWRTA monitors ridership on a daily basis for routes with the highest ridership and considers adding service to encourage greater usage. The demand response fleet consists of a mix of 4, 8, and 12-passenger vehicles. MWRTA schedules demand response trips so that the passenger load cannot exceed the available seated capacity on the vehicle. MWRTA also monitors the timeliness of the demand response service to ensure a sufficient fleet is available to meet the demand.

MWRTA Service Standard for Vehicle Load

MWRTA fixed route passengers will have a seat available to them except in instances of peak periods in which it is acceptable for passengers to stand on the vehicle. Fixed Route passengers are asked to hold packages in their laps during peak periods to ensure that as many seats as possible are available.

- 2) Vehicle Headway - Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a component of the amount of travel time expended by a passenger to reach his/her destination. It is generally expressed for peak and off-peak service as an increment of time (e.g. peak: every 15 minutes; and off-peak: every 30 minutes). Recipients may set different vehicle headway standards for different modes of transit service (such as bus, rail, bus rapid transit, and commuter rail). A vehicle headway policy might establish a minimum frequency of service based on population density. For example, a 15-minute peak and 30-minute off-peak service might be the standard for routes serving the most densely populated portions of the service area. Thirty (30) minute peak hour service might be the standard in less densely populated areas. Headway policy is typically related to vehicle load. For example, a policy might state that service frequency will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

MWRTA's goal is to provide service at intervals that are conducive to encouraging the use of public transit as a viable alternative to a private automobile. Presently, MWRTA vehicle headways are determined by funding availability and ridership. On those routes with the highest ridership, MWRTA operates more frequent service, and those routes which are commuter based have schedules based on peak commuting hours. MWRTA has a goal of getting to 60-minute and 30-minute headways (based on ridership demand) across its system. However, service levels will be determined by funding availability.

MWRTA Service Standard for Vehicle Headways

MWRTA routes will be operated on regular intervals based on ridership and route purpose (i.e., commuter based versus trunk lines).

Based on funding availability, routing, and ridership, MWRTA strives for a minimum of hourly service on all routes, with the exception of special purpose trips, such as commuter-based trips in which limited frequency is appropriate.

- 3) On-time Performance - On-time performance is a measure of runs completed as scheduled. This criterion must define what is considered "on time." For example, it may be considered acceptable if a vehicle completes a scheduled run within five minutes of the established schedule. The percentage of times that vehicles on a particular route or line complete runs within this standard are then measured. An acceptable level of performance must be defined. For example, an agency might define on time as 95% of all runs on a particular route or line completed within the allowed on-time window (e.g., five minutes).

MWRTA defines a route as being on-time if it leaves the transit hub within 5 minutes of its scheduled block start time. MWRTA's service standard is that 97% of all of its route starts will be "on-time." For demand response service, MWRTA provides The Authority's customers a "promise time," the time in which the vehicle will arrive at the origin of their trip request. A trip is considered "on-time" if the trip arrives between 0 - 15 minutes after the promise time.

MWRTA Service Standard for On-time Performance

MWRTA's service standard is defined as 97% of its route starts leaving the transit hub within 5 minutes of the scheduled trip time. Also, 97% of the demand response trips will arrive within 15 minutes of the promise window.

- 4) Distribution of Transit Amenities - Transit amenities refer to items of comfort and convenience available to the general riding public. These items include, but are not limited to, benches, shelters, route maps, timetables, trash receptacles, and intelligent transportation systems (such as electronic fare payment and vehicle arrival information displays) along bus routes and at fixed guideway stations and elevators. Transit agencies may set different service standards for the different modes of service that they provide. Policies or standards in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines

whether transit users have equal access to these amenities. Standards for the installation of transit amenities along bus routes are often based on the number of passenger boardings that occur at stops along the routes. Transit agencies should not set standards for amenities such as bus shelters that are solely installed and maintained by a separate jurisdiction, such as a municipality. Transit agencies should set standards for amenities such as bus shelters that are installed and maintained under a contract between the transit authority and the private entity. In these cases, the transit agency should communicate its service standard to the private entity.

The MWRTA has identified the following transit amenities: The CATCH App is a tracking and customer information application available for both Apple (iOS) and Android devices. These applications are designed for smartphone use and make it easier than ever to track The Authority's vehicles and find the latest schedule information. The Catch App is available for download within the Apple and Google Play stores. Customers can now track vehicles, view up-to-date schedules, receive alerts, and even live chat directly with The Authority's dispatchers from their mobile devices.

MWRTA has implemented intelligent transportation system (ITS) equipment, including global positioning systems (GPS) that provide real-time vehicle locations to customers online, automated passenger counters (APCs), monitors, stop annunciators, cameras, bus shelters, and signage. The Authority requires all vehicles to be equipped with the same level of amenities, including ITS equipment.

Our transit hub is located within an environmental justice (EJ) neighborhood with a high proportion of minorities and low income individuals. MWRTA has identified the expansion of passenger amenities as a priority for the future. It is The Authority's belief that passengers will benefit from a more comfortable transit experience. Amenities will be distributed based on the number of passengers at a location, ADA spatial requirements, and The Authority's ability to secure the right to install the sign or shelter by the municipality or property owner. MWRTA does not own shelters but rather encourages communities to install and maintain them.

MWRTA Service Standard for Distribution of Transit Amenities

MWRTA requires that all vehicles have consistent amenities when placed in service, including ITS capabilities such as real-time GPS.

MWRTA does not own or maintain any shelters or benches other than those located at the agency's hub at 15 Blandin Avenue and Framingham Commuter Rail Station at 1 Franklin Street in Framingham. MWRTA has initiated a signage plan, which is installing bus stop signs at locations with high boardings. Sign locations are negotiated with the business or community.

In the last five years, a number of apartment complexes have been built in the surrounding area. MWRTA will work with the town/city planning personnel to ensure that appropriate resources are provided to assist new residents navigate the services available.

- 5) Service Availability – Service availability is a general measure of the distribution of routes within an agency's service area. For example, a policy might be to distribute service so that 90 percent of

all residents in the service area are within one-quarter mile of bus or rail service. A policy might also indicate the maximum distance between stops along bus routes. These measures of coverages and stop distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distances might be shorter distance than it would be in suburban or rural areas. In less densely populated areas, the percentage of the total population within one-fourth mile to routes or lines might also be lower. Commuter rail availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations. The standard of policies covering this area applies to the existing services as well as proposed changes in the levels of service (e.g. expansion, addition, or deletion of routes).

MWRTA service is financed through a combination of federal, State, and local resources. Decisions to add a new service are contingent upon several factors, including the local community's ability to provide operating funds for the proposed service. In determining new services, MWRTA considers need, potential ridership, available funding, origins, and destinations. Currently, most of The Authority's routes provide flag-down service.

MWRTA Service Standard for Service Availability

MWRTA member communities determine the level of service provided in their area by the level of financial support they provide to the MWRTA. MWRTA will determine, within those towns, routing to ensure that service is provided equitably.

MWRTA services will travel primarily on main roads; however, at the request of a passenger, the bus can deviate within a short distance of the route. Routes are designed to be in tune with potential trip origins or destinations, including group homes, senior centers, employment centers, shopping, medical, educational, or recreational facilities. High-density areas, low-income areas, or areas with high levels of transit-dependent populations will be given consideration and preference in routing decisions.

MWRTA has undergone an extensive, comprehensive transit plan review with contractor AECOM in cooperation with MassDOT to review available service in the region, review needs, and discuss areas for expansion in the future. This review includes a comprehensive market evaluation of transit-dependent populations, including historically underprivileged groups, and discusses potential expansions of service availability.

Provision: Service Policies

Circular Reference: Chapter V, Part 3
Regulations or Reference: 49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement: System-wide Policies (such as policies for vehicle assignment or transit security)

In order to comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, recipients to which this chapter applies shall adopt system-wide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Vehicle assignment. Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and routes throughout the system. Policies for vehicle assignment can be based on the age of the vehicle. For example, a recipient may have a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system average. The policy could also be based on the type of vehicle. For example, an agency could assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, certain types of vehicles could be assigned for express or commuter service. Agencies deploying vehicles equipped with technology designed to reduce emissions may establish a policy for the deployment of these vehicles throughout their service area. For example, a policy could be to distribute vehicles so that the level of emissions per bus at each depot is comparable.

All MWRTA fixed route vehicles and paratransit vehicles are assigned to one bus garage. Buses are randomly assigned to routes to ensure that buses receive equal wear and tear (mileage) and that vehicles are disbursed throughout the entire service area without prejudice. This system also reduces driver complaints about their vehicle assignment.

For paratransit service, vehicles are randomly scheduled, with the exception of the type of vehicle and whether a customer has a restriction to use only a particular type of vehicle, such as a transit van. Being assigned solely to one type of vehicle requires a customer to produce a doctor’s sign-off that one vehicle type is preferable to another due to a physical or mental constraint. This is considered when scheduling, if possible; however, cannot be guaranteed.

MWRTA Service Policy for Vehicle Assignment

MWRTA rotates its fixed route fleet throughout each of the routes to ensure that mileage on each vehicle is roughly equivalent and that all vehicles operate on all routes.

For paratransit service, computer software randomly assigns trips to vehicles based on customer vehicle type and routing efficiency.

Transit security – Transit security refers to measures taken to protect a recipient’s employees and the public against any intentional or threat of violence or personal harm, either from a criminal or terrorist act. These actions include, but are not limited to, deploying surveillance technology and security personnel along routes and stations, implementing security training programs for employees and security awareness programs for the public, and conducting inspections of facilities and passengers. Decisions to provide a greater level of security at some but not all of the recipient’s fixed guideway stations in the area or along some but not all of a recipients transit routes should be based on neutral criteria such as assessment of threats to facilities, data showing higher levels of criminal activities at certain facilities or in vehicles traveling along certain routes, or objective information that leads officials to believe that certain facilities or routes are more likely to be at risk. Policies associated with observing suspicious activity should ensure that suspicious activity is observed without regard to race, color, or national origin.

MWRTA takes security issues seriously as it is responsible for the security of its passengers, personnel, and assets. MWRTA implements security measures that protect these assets without regard to the area or demographic characteristics of the population in which the asset is located. Physical assets are protected at their permanent garaging location as well as while in use. Passengers, personnel, and assets are protected through the use of stationary and mobile security devices such as cameras and mobile onboard cameras. The agency’s transit hub has additional safety equipment, including alarms, fire suppression systems, and a fenced-in lot (with open access at the 15 Blandin Avenue entrance/exit).

MWRTA Service Policy for Transit Security

MWRTA has installed and maintains security equipment to protect its personnel and assets at its transportation Hub, including cameras, security systems, alarms, fire suppression systems, and a fenced-in lot (with open access at the 15 Blandin Avenue entrance/exit). Images from the facility camera systems shall be kept on file for a period of at least one month. MWRTA facility personnel are trained to access and monitor camera footage.

All MWRTA vehicles are equipped with cameras that are automatically activated in case of an accident or upon manual activation by the driver in case of an onboard incident. The cameras record any accident or incident with real-time images to be used in the investigation of an event. Incident-based images from the camera systems are kept on file for a period of at least two weeks. MWRTA maintains continuous feed recording devices on all vehicles that capture audio and video.

Provision: Equity Evaluation of Service and Fare Changes

Circular Reference:	Chapter V, Part 4
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Analysis of impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. The recipient should have established guidelines or thresholds for what it considers a “major” change to be. Often, this is defined as a numerical standard, such as a change that affects 25 percent of the service hours of a route. FTA recommends that recipients evaluate the impacts of their service and/or fare changes using one of the following two options:

Option A: Recipients are encouraged to evaluate the impacts of proposed service and fare changes according to the following procedures:

1. Assess the effects of the proposed fare or service change on minority and low-income populations.
 - a) Route Changes: For proposed major service changes that would reduce or expand the frequency of service or add or eliminate routes, the recipient should produce maps of the routes that would be eliminated, reduced, added, or expanded, overlaid on a demographic map of the service area, that highlights those Census tracts or traffic analysis zones where the total minority and low-income population is greater than the service area average.
 - b) Span of service: For the proposed changes that would reduce or expand hours and days of service, the recipient should analyze any available information generated from ridership surveys that indicate whether minority or low-income riders are more likely to use the service during the hours and/or days that would be eliminated.
 - c) Fare Changes: For proposed fare changes that would increase or decrease fares on transit modes or by fare payment type or payment media, the recipient should analyze any available information generated from ridership surveys indicating whether minority or low-income riders are more likely to use the mode of service, payment type, or payment media that would be subject to the fare increase.
2. Assess the alternatives available for people affected by the fare increase or major service change.
 - a) Service Changes: For proposed service changes, the recipient should analyze what, if any, modes of transit or transit routes are available for people affected by the service expansions or reductions. This analysis should compare the travel time and cost of the current route with the travel time and cost to the rider of the alternatives.

- b) Fare changes: For proposed fare changes, the recipient should analyze what, if any, alternative transit modes, fare payment types or fare payment media are available for people affected by the fare change. This analysis should compare the fares that are paid under the change with fares that would be paid through available alternatives.
- 3. Describe the actions the agency proposes to minimize, mitigate, or offset any adverse effects of proposed fare and service changes on minority and low-income populations.
- 4. Determine, which, if any, of the proposals under consideration would have a disproportionately high and adverse effect on minority and low-income riders. Recipients can implement a fare increase or major service reduction that would have disproportionately high and adverse effects provided that the recipient demonstrates that the action meets a substantial need that is in the public's best interest and that alternatives would have more severe adverse effects than the preferred alternative.

Option B: Locally Developed Evaluation Procedure. Recipients have the option of modifying the above option or developing their procedures to evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. This locally developed alternative shall include a description of the methodology used to determine the impact of the service and fare change, a determination as to whether the proposed change would have discriminatory impacts, and a description of what, if any, action was taken by the agency in response to the analysis conducted.

MWRTA defines a "major service change" as the addition of any new bus route or removal of any bus route which has been in service for more than three years. MWRTA allows all routes to be adjusted within the first three years of service to iron out routing or schedule issues. In addition, three years is the MWRTA trial period for "pilot program" routes. Several of MWRTA's bus routes were initially developed as pilot programs that were funded with temporary resources. At the end of the trial period, MWRTA meets with local communities and or businesses, who may consider providing long-term and sustainable funding for the continuation of the route.

In the event of future changes to routing or fares, the MWRTA would adopt Option B: Locally Developed Evaluation Plan. The steps in this plan are outlined below:

Equity Evaluation to Route Changes:

MWRTA allows routes a three-year trial period during which time any new route may be modified to accommodate minor changes to the running time or routing based on operational experience. After this time period is complete, the route is presented to the local MWRTA community, which will determine whether to fund the route based on information regarding demographics, ridership, and the location the route serves. Local communities must ultimately decide whether a route remains in existence, as they provide funding for the services.

Major changes are defined as changes to the route of more than 25% of service hours or miles that require a more thorough assessment. These changes must be examined to determine the potential impact on minority or low-income populations. MWRTA uses census information as well as knowledge of local low-income geographies, such as the location of subsidized housing or low-income resources such as clinics, to assess the impact of such changes. MWRTA will take into consideration accessibility and alternative transportation options as part of the decision-making process. MWRTA meets proactively with community leaders to discuss the changes to community program locations to ensure that we serve places of interest for The Authority’s passengers.

MWRTA has a Chief Operating Officer/Deputy Administrator, Fixed Route and Demand Response Managers, Director of Travel Training and Community Relations, and Administrative Assistant/Operations who interact with MWRTA committee members to ensure open communication to discuss any changes that will affect the community.

Equity Evaluation of Changes to the Fare Policy:

MWRTA will assess how changes to the fare policy will affect minority and low-income communities in comparison with non-minority or higher-income communities to ensure that the burden does not unfairly target minority or low-income riders. Steps may include determining the validity of “zones” and their geographic definition or the use of discounted multi-ride passes.

MWRTA presently has a single bus fare for all bus routes. The full adult cash fare is \$1.50, and CatchCard rates are \$1.25. MWRTA will also be adding a monthly pass option for fixed route riders at assss cost of \$20.00 for adults. This is not deemed a major change as all available fare options remain. For Demand Response service, MWRTA’s ADA one-way fare is \$2.00 for each passenger and companion. PCAs travel for free with the passenger they are assisting. These fares are currently waived through a grant program with MassDOT.

MWRTA conducts regular and recurring fare reviews to ensure equity.

Provision: Monitoring

Circular Reference:	Chapter V, Part 5
Regulations or Reference:	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21
Reporting Requirement:	Results of either level of service monitoring, quality of service monitoring, analysis of customer surveys, or locally developed monitoring procedure.

In order to comply with 49 CFR Section 21.5(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall monitor the transit service provided throughout the recipient’s service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. Monitoring shall be conducted at a minimum of once every three years. If a recipient’s monitoring determines that prior

decisions have resulted in disparate impacts, agencies shall take corrective action to remedy the disparities. FTA recommends that recipients fulfill this requirement by implementing at least one of the following four service monitoring procedures:

Option A: Level of Service Methodology

- 1) MWRTA is partnering with MassDOT to monitor the level and quantity of its service which will include those routes that provide service to predominantly minority and low-income areas.
- 2) MWRTA will assess route performance based on a system of performance metrics that incorporate performance targets relevant to ridership, customer service and satisfaction, asset management, and financial performance.
- 3) MWRTA performance targets shall be measured against established baselines and include a timeline for implementation.
- 4) In cases where the service does not meet the stated service policy or standard target, MWRTA will take corrective action and develop a Performance Improvement Plan to improve the progress on the attainment of the targets.
- 5) MWRTA has worked closely with MassDOT in the development of a 5-year plan, which included a review of levels of service available and discussed potential areas for increase and expansion.

Option B: Quality of Service Methodology

- 1) Recipients should identify an appropriate number of Census tracts or traffic analysis zones that represent a cross-section of the recipients population. A portion of this sample should include census tracts of traffic analysis zones where minority and/or low-income residents predominate. Recipients should keep in mind that the greater the sample size, the more reliable the results.
- 2) Recipients should identify the most frequently traveled destinations for riders using the recipient's service.
- 3) For each of the three most frequently traveled destinations, recipients should compare the average peak hour travel time to destination, average non-peak hour travel time to destination, number of transfers required to reach the destination, the total cost of the trip to reach the destination, and cost per mile of a trip to the destination for people beginning the trip in the selected census tracts to traffic analysis zones.
- 4) If disparities exist in any of these factors along the trips to any of the destinations analyzed, recipients should determine whether the differences are significant. FTA recommends that recipients employ standard statistical tests for significance to make this determination.
- 5) If significant disparities in one or more quality of service indicators have been confirmed, recipients should determine why the disparity exists and take corrective action to correct the disparity.

Option C: Title VI Analysis of Customer Surveys

- 1) For their most recent passenger survey, recipients should compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets, and the responses of those who identified themselves as white and/or middle and upper-income brackets.

- 2) To the extent that survey data is available, recipients should determine whether the different demographic groups report significant differences in travel time, number of transfers, and overall cost of the trip or if different demographic groups gave significantly different responses when asked to rate the quality of service, such as their satisfaction with the system, willingness to recommend transit to others and value for the fare paid.
- 3) If the agency concludes that different demographic groups gave significantly different responses, it should take corrective action to address the disparities.

Option D: Locally Developed Alternative

Recipients have the option of modifying the above options or developing their own procedures to monitor their transit service to ensure compliance with Title VI. Any locally developed alternative should be designed to ensure the agency's service meets the expectations of 49 CFR Part 21, as illustrated by the example in Appendix C of the same, which provides that "no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of service of transportation service furnished as part of the project on the basis of race, color, or national origin."

APPENDIX A

Title VI Complaint Policy in English, Spanish, Portuguese, and Chinese Mandarin

Title VI Complaint Policy

If you feel you have been discriminated against by MWRTA staff/contractors or service provided by the agency, please contact the MetroWest Title VI Officer - Mark McClanan at 508-935-2222. Mr. McClanan will ask you to submit your complaint in writing using the form provided. Please include as much information as possible, including the date, time, and location of the incident. Mr. McClanan will investigate the complaint and respond within two weeks.

If the investigation and resolution do not satisfy you, you have the right to appeal by contacting the agency's Administrator, Jim Nee, who will provide a determination and a proposed resolution on the matter within a two-week period. The MWRTA Transit Administrator may be contacted at 508-935-2222.

If you remain unsatisfied with the determination and resolution of your complaint by the MWRTA, you are encouraged to contact the Federal Transit Administration at 617-494-2055 for further determination. When contacting the FTA, please refer to Title VI complaints.

MWRTA does not tolerate discrimination by any of its employees or contractors. It is The Authority's goal to work with you to ensure that all people are treated fairly in the provision of federally funded transit services.

Título VI de las reclamaciones

Si usted siente que ha sido discriminado por el personal MWRTA / contratistas o servicio prestado por la agencia, por favor ponte en contacto con el MetroWest título oficial de VI - Mark McClanan al 508-935-2222. La Sra. Willens le pedirá que presente su queja por escrito en el formulario previsto. Por favor, incluya tanta información como sea posible, incluyendo la fecha, hora y lugar del incidente. La Sra. Willens investigará la denuncia y en contacto con usted dentro de dos semanas.

Si la investigación y la resolución no le satisface, usted tiene el derecho de apelar en contacto con la administradora de la Agencia, Jim Nee, que proporcionará una determinación y una propuesta de resolución sobre el asunto dentro de un período de dos semanas. El MWRTA Tránsito Administrador puede ser contactado en 508-935-2222.

Si te quedas satisfecho con la determinación y la resolución de su queja por el MWRTA, que se pongan en contacto con la Administración Federal de Tránsito en 617-494-2055 para la determinación posterior. Cuando se comunique con el TLC por favor, consulte el Título VI quejas.

MWRTA no tolera la discriminación por cualquiera de sus empleados o contratistas. Nuestro objetivo es trabajar con usted para asegurar que todas las personas reciban un trato justo en la prestación de los servicios de transporte de fondos federales.

Título VI da Política Reclamação

Se você sente que tem sido discriminado por MWRTA funcionários / contratados ou serviços prestados pela agência, entre em contato com o gestor MetroWest Título VI - Mark McClanan em 508-935-2222. Mr. McClanan vai pedir para você enviar a sua reclamação por escrito no formulário próprio. Por favor, inclua o máximo de informações possíveis, incluindo data, hora e local do incidente. Ms. Willens vai investigar a queixa e voltar para você em duas semanas.

Se a investigação e resolução de não satisfazê-lo, você tem o direito de apelar em contato com a agência de Administrador, Jim Nee, que irá proporcionar uma determinação e uma proposta de resolução sobre o assunto dentro de um período de duas semanas. O MWRTA Trânsito administrador pode ser contactado em 508-935-2222.

Se você ficar insatisfeito com a determinação e resolução de sua queixa pela MWRTA, que são incentivados a contactar a Administração Federal de Trânsito em 617-494-2055 para a nova determinação. Ao contatar o TLC consulte queixas Título VI.

MWRTA não tolera a discriminação por qualquer de seus empregados ou terceiros contratados. É nosso objetivo de trabalhar com você para garantir que todas as pessoas são tratadas de forma justa na prestação de serviços de trânsito financiados pelo governo federal.

Title VI Complaint Policy in Chinese Mandarin

第六编申述政策

如果您觉得MetroWest区域交通管理局 (MWRTA) 的员工/承包人歧视您，或者在本机构提供的服务中遭受歧视，请拨打508-935-2222联系MetroWest第六编项目官员 Mark McClanan。sssssMarkMcClanan女士将要求您填写本文件提供的表格，以书面形式提交申述。请尽可能详尽地填写信息，包括提供事件发生的日期、时间和地点。Willens女士随后将会对申述展开调查并在两周内给予您答复。如果您对调查结果或解决方案不满意，您有权联系本机构主管 Jim Nee 进行上诉。Jim Nee 也将在两周内就该事件作出决定和给出拟定的解决方案。您可拨打508-935-2222联系MetroWest区域交通管理局 (MWRTA) 交通主管。如果您对MetroWest区域交通管理局 (MWRTA) 针对您申述作出的决定或提议的解决方法仍然不满意，我们鼓励您拨打617-494-2055联系联邦交通管理局 (Federal Transit Administration)，请求该机构作出进一步决定。在联系联邦交通管理局 (FTA) 时，请表明是针对第六编的申述。MetroWest区域交通管理局 (MWRTA) 绝不容忍任何员工或承包人的歧视行为。我们的目标是与您共同努力，确保所有人在享有联邦财政资助的交通服务时受到平等对待。

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In the past, consumers have requested documents considered vital in the Title VI Program. We currently have the vital documents available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。
Rúguǒ xūyào qítā yǔyán de xìnxi, qǐng zhidiàn (508)935-2222 yǔ MWRTA liánxi.

APPENDIX B
Title VI Complaint Form

Title VI of the 1964 Civil Rights Act states that “no person in the United States shall on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel that you have been discriminated against by the MetroWest Regional Transit Authority or any of its employees, please submit the following complaint form so that we may investigate the claim.

Send the completed form to:

Mark McClanan
MetroWest Regional Transit Authority
15 Blandin Avenue
Framingham, MA 01702

Telephone: 1-508-935-2222

1. Name _____

Address _____

Phone _____ Email _____

2. Does your complaint concern:

_____ Discrimination in the delivery of services

_____ Discriminatory actions towards you or another individual

On what basis do you believe the discrimination took place?

_____ Race/Ethnicity _____
_____ Color _____
_____ National Origin _____

3. What is the best way to contact you regarding this claim?

4. On what date did the alleged discrimination occur?*

* We request that complaints be filed within 180 days of the incident.

5. Please provide a detailed account of the alleged discrimination, including who was involved, where it occurred, and why you believe it happened. Please attach additional pages if necessary.

6. List any witnesses and their contact information that we may contact for additional information.

7. How would you like this problem to be resolved?

APPENDIX C - Title VI Investigations, Complaints, or Lawsuits Log

	Date (Month, Day, Year)	Summary Nature/Basis of Complaint (Include Race, Color, or National Origin)	Status	Action(s) Taken
Investigations	None.			
1.				
2.				
3.				
Complaints	None.			
1.				
2.				
3.				
Lawsuits				
1. Whitfield v. MWRTA	Filed August 5, 2022	Customer claims she was denied service due to her status in a number of protected categories.	Case is being investigated by Massachusetts Commission Against Discrimination	MWRTA responded to the lawsuit on November 10, 2022. MWRTA maintains the customer was not discriminated against. See attached letter for further details.
2.				
3.				

GORDON LAW GROUP, LLP
COUNSELORS AT LAW

585 Boylston Street
Boston, MA 02116
Ph: 617-536-1800
Fax: 617-536-1802

Benjamin Flam, Esq.
bflam@gordonllp.com

December 5, 2022

Region One
Federal Transit Administration

RE: MetroWest Transit Authority – Title VI Report

Dear Sir or Madam:

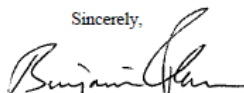
I serve as employment counsel to the MetroWest Transit Authority (MWRTA). In accordance with 49 CFR Section 21.9(b), and in connection with MWRTA's Title VI Program submission for 2022, I write to convey the list of investigations, complaints and lawsuits that allege discrimination on the basis of race, color or national origin.

On August 5, 2022, a charge of discrimination was filed by Ms. Jessica Whitfield before the Massachusetts Commission Against Discrimination (MCAD), alleging discrimination on the basis of race, color and national origin, among other protected classes. Ms. Whitfield claims she was denied service because of her status in a number of protected categories.

Ms. Whitfield was not the victim of any discrimination. Indisputable video evidence demonstrates Ms. Whitfield's misconduct. In sum, Ms. Whitfield refused to follow MWRTA's rules, including debussing at the end of the route, disrupting other passengers' experiences, and exhibiting violence towards MWRTA staff. The police departments for both the Town of Natick (Massachusetts) and the City of Framingham (Massachusetts) responded on multiple occasions to assist MWRTA staff in dealing with Ms. Whitfield and the events giving rise to her complaint.

MWRTA filed its position statement in response to the charge with MCAD on November 10, 2022, and Ms. Whitfield did not file any rebuttal within the 21-day period allotted by MCAD regulations. The case is currently with the MCAD investigator awaiting disposition. We believe the case will be dismissed by MCAD for Lack of Probable Cause.

Sincerely,


Benjamin Flam

APPENDIX C (Continued)

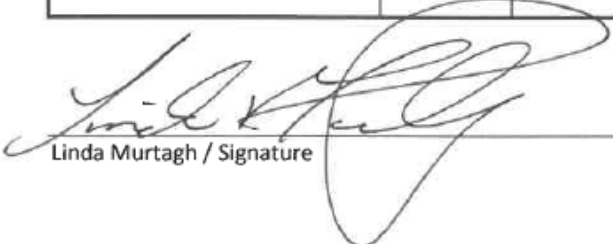
Title VI Board / Committee Member Ethnicity Form

MetroWest Regional Transit Authority (MWRTA)

TITLE VI Program 2025

Advisory Board Member Ethnicity

	Black American	Hispanic American	Native American	Subcontinental Asian American	Asian Pacific American	Non-minority
Ashland						X
Disabled Community Member						TBD
Dover						X
Framingham						X
Holliston						X
Hopedale						X
Hopkinton						TBD
Hudson						X
Marlborough						X
Milford						X
Natick						X
Sherborn						X
Southborough						X
Sudbury						X
Wayland						X
Wellesley						X
Weston						X



 Linda Murtagh / Signature

APPENDIX D - MWRTA LEP CARD

MetroWest Regional Transit Authority Limited English Proficiency Card

2004 Census Test	United States Census 2010
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Խոսողո՞ւմ ե՞սք 'նշո՞ւմ կատարե՞ք այս քառակուսում, եթե խոսո՞ւմ կա՞մ կարդո՞ւմ եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্স দাগ দিন।	3. Bengali
<input type="checkbox"/> ល្អប្រសើរណាស់ប្រសិនបើ៖ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi
<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian

APPENDIX D - MWRTA LEP CARD (Continued)
MetroWest Regional Transit Authority Limited English Proficiency Card

<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຂໍ້ວງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратих уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องว่างถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

APPENDIX E

Vital Documents for Safe Harbor Limited English Proficiency (LEP) Compliance

MWRTA has determined the following documents are Vital Documents for people with Limited English Proficiency (LEP):

Notification of Rights

Complaint Policy

Complaint Form

ADA Application for Determination Parts A and B

ADA Ride Guide

Updated versions of each document in Safe Harbor Languages are available in Spanish, Portuguese, and Chinese Mandarin.

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In the past, consumers have requested documents considered vital in the Title VI Program. We currently have the vital documents available in Spanish, Portuguese, and Chinese Mandarin. If information is needed in another language, please contact MWRTA at (508) 935-2222.

Spanish: Si necesita información en otro idioma, comuníquese con MWRTA al (508) 935-2222.

Portuguese: Se as informações forem necessárias em outro idioma, entre em contato com MWRTA em (508) 935-2222.

Russian: Если необходима информация на другом языке, свяжитесь с MWRTA по телефону (508) 935-2222.

Polish: Jeśli potrzebne są informacje w innym języku, prosimy o kontakt z MWRTA pod numerem (508) 935-2222.

Chinese Mandarin: 如果需要其他语言的信息，请致电（508）935-2222与MWRTA联系。
Rúguǒ xūyào qítā yǔyán de xīnxī, qǐng zhìdiàn (508)935-2222 yǔ MWRTA liánxì.