

# FTA Triennial Report

*Overview,  
Triennial Monitoring Results,  
and Next Steps  
Part 2*

September 25, 2017

DRAFT

Last week's presentation included:

- a) An overview of the Title VI Triennial requirements
- b) The nature of the Board vote to approve the 2017-20 Title VI Program
- c) A review of the service standard monitoring requirement and data where potential disparate impacts were or were not identified
- d) The MBTA response to identified potential disparate impacts

## Part 2 - Overview

Today, staff will complete the Authority's update on the triennial MBTA Title VI Program obligation, procedures, and achievements during the 2014-2017 cycle, and update the FMCB on

- the results of the service policy monitoring efforts related to conditions and amenities
- our public engagement work and the draft revised Public Participation Plan

Staff recommends that the FMCB approve the Title VI Program document for submission to the FTA. This document is due by October 1, 2017, to be in effect from 2017-2020

- FTA requires monitoring of performance on service standards and policies
- MBTA works with the Central Transportation Planning Staff (CTPS) to collect, review, analyze, and address data findings
- Each analysis compares performance on standards between minority and nonminority identified riders or areas
- MBTA Disparate Impact threshold of 20% is used to identify potential disparities

- **FTA specifies monitoring of the following service standards:**
  - Vehicle Load
  - Vehicle Headway
  - On-Time Performance
  - Service Availability
  
- **FTA specifies monitoring of the following service policies:**
  - Distribution and Condition of Transit Amenities
  - Vehicle Assignment
  
- **MBTA's Service Delivery Policy incorporates additional standards:**
  - Span of Service
  - Platform Accessibility
  - Vehicle Accessibility
  - Service Operated

– **Biennial, odd years:**

- Bus shelter placement, condition, seating, and amenities

– **Biennial, even years:**

- Rail station and Silver Line amenities and condition
- Provision of information

– **Annual:**

- Availability of fare collection and vending terminals
- Station escalator operability
- Vehicle assignment (by age and bus air conditioning operability)

- The monitoring process provides findings, as to each service aspect analyzed, which are reviewed overall with MBTA department leads.
- If potential disparities are found:
  - Data will be scrutinized and reevaluated
  - Non-Title VI related factors may be identified as causes or contributing factors
  - Staff and leadership are asked to address potential disparities and confirm compliance through future monitoring results
- ***In recent triennial cycles, MBTA's monitoring activities have not identified recurring disparities, but have cited areas that were reviewed and addressed through corrective action.***

## **No potential disparities** among the following:

- Automated Fare Collection – four variables assessed (Table 6-66 to 69)
- Bus stop shelter placement
- Bus stop seating
- Bus shelter conditions – three variables (Table 6-51),
- Subway Rapid Transit Amenities - 9 variables assessed (Tables 6-52, 53)

## **No potential disparities** among the following:

- Surface Rapid Transit, platform and shelter conditions – 8 variables assessed (Table 6-59)
- Commuter Rail, station amenities – 5 variables assessed (Table 6-62)
- Provision of Information – four variables assessed (Tables 6-70 to 73)
- Escalator operability
- Vehicle age (all modes) and bus air conditioning operability

Of the 13 areas the Authority monitored, ODCR's analysis indicated POSSIBLE disparities in three areas:

- Subway Rapid Transit Conditions - 20 variables assessed, with six potential disparities
- Surface Rapid Transit, station amenities – 5 variables assessed, with two potential disparities
- Commuter Rail, platform and shelter conditions – 11 variables assessed, with one potential disparity

## Subway Rapid Transit Conditions - 20 variables assessed, with three potential disparities related to the condition of stations:

1. Stairwells
2. Platform surfaces
3. Platform stairwells

### Actions –

-In addition to other efforts by the Authority to reduce the State of Good Repair (SGR) backlog and improve the customer experience, the Engineering & Maintenance Department continues to review these observations and, if not addressed through other efforts, will prioritize a scope of work for maintenance and/or program for capital investment.

-It is important to note that CTPS observations are one time visual assessments for Title VI monitoring purposes only, and are not intended to reflect the more technical and detailed asset management criteria refined and implemented by the Authority since the start of triennial assessment activities in 2014.

## **Subway Rapid Transit Conditions - 20 variables assessed, with 3 potential disparities related to cleanliness**

1. Station exteriors
2. Lobbies
3. Platforms

### **Actions –**

-New station cleaning contracts had been put in place and cleanliness monitoring has improved through oversight via app-based assessment tool

-It is important to note that CTPS observations were conducted from February-March 2016 and are one time visual assessments for Title VI monitoring purposes only. They are not intended to reflect the more technical and detailed metrics put in place under the new station cleaning contracts in 2017, after the start of 2014 triennial assessment activities.

## Surface Rapid Transit, station amenities – 5 variables assessed, with two potential disparities

1. Availability of trash receptacles
2. Availability of recycling receptacles

### Action –

Engineering & Maintenance Department will review maintenance issues presented and evaluate findings, toward a prioritized scope of work for maintenance or to program for capital investment.

**Note:** Surface Rapid Transit was monitored from February-June 2016

Commuter Rail, platform and shelter conditions – 11 variables assessed, with one potential disparity

## 1. Cleanliness of platforms

### **Action –**

- Four Corners/Geneva and Uphams Corner were the stations identified for cleanliness concerns, although each is currently cleaned five days per week. Recurring vandalism is a cause for this condition, and efforts will be made to repair damaged items as quickly as possible, with modifications made to items damaged most frequently.
- Talbot Avenue station was being cleaned on a two day per week schedule, which will be increased to five days per week.

**Note:** Commuter Rail was monitored from February-March 2016

- During the 2017-2020 triennial cycle, MBTA Title VI Working Group will meet routinely to plan for triennial submission, reporting, trend analysis and response to data findings
- ODCR, OPMI and CTPS will coordinate on data reporting as part of the Working Group strategy
- Based on new annual monitoring strategy, meetings with key departments for review of findings will be done on a quarterly basis
- Findings and response activities will be reported to FMCB on at least an annual basis:
  - To review progress and the Authority's trajectory.

- As part of Title VI compliance efforts, transit providers must create public participation plans, including opportunity for public comment, mandated board approval and federal review and concurrence
- FHWA and FTA concurred with MassDOT's Public Participation Plan in 2014, for both Highway and Rail & Transit Divisions
- The MBTA adapted the MassDOT PPP to meet its requirement as part of the 2014 MBTA Title VI Program, it remains in effect for the 2017 MBTA Title Program.

- Key public participation opportunities in transit include:
  - disparate impact/disproportionate burden equity analyses
  - service delivery policy development
  - major service changes
  - mitigation in cases of adverse disparate impact (on fare and major service changes)
  - impacts related to construction activities

- Diverse and effective outreach
- Accessible location and reasonable accommodations
- Language support
- Timely response to public questions and consideration of public comments
- Effective information dissemination across demographics
- Flexibility required to ensure the Authority can meet its public commitments to reduce SGR backlog and modernize

- MBTA is committed to ensuring that all public meeting are fully accessible to persons with disabilities.
- MassDOT/MBTA Accessible Meeting Policy, created in 2013, frames the obligations and protocols for accessible interactions with the public and provides resources, like checklists, to ensure accessibility
- Guidelines and checklists exist for the following strategies:
  - Accessibility of location, room, and set-up
  - Alternate formats
  - Sign language and real-time transcription

# Draft PPP Revisions

- The MBTA is working to revise the PPP to better align with our need to rapidly reduce the SGR backlog and modernize to provide the reliable system our customers deserve.
- Draft PPP retains the philosophy, guidance, and standards, including language to support the Authority's work on fiscal and infrastructure challenges
- The revised PPP is under internal review and will be shared with the public once all departments have assessed the potential impact on operations
- Final PPP will be implemented through on-going training for departments responsible for conducting public engagement
- The MBTA will engage the public during fall 2017, and seek to finalize the new PPP during winter 2018

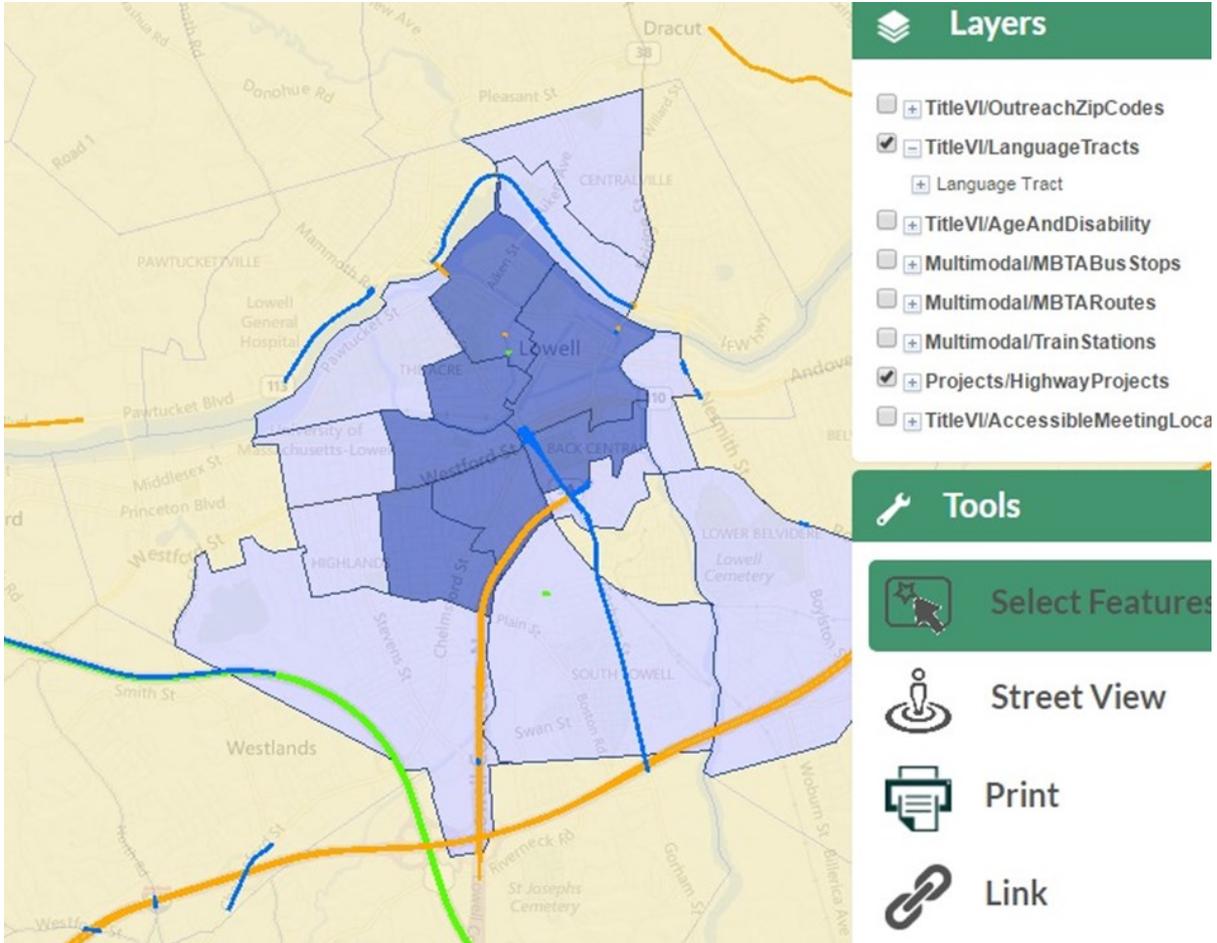
# Request for Board Approval

- Staff requests and recommends that the Board approve this document for submission to FTA.

- New public participation tools

- OTP and ODCR have developed an online tool to support public engagement for transportation programs, services, and initiatives
- “Engage” software tool supports Title VI and PPP compliance, allowing project managers, frontline staff, planners, leadership, and partners to build stronger engagement strategies, including language access.
- Features:
  - Language Demographics
  - Mail merge ready community contacts (with emphasis on Title VI organizations); 4000 contacts to date
  - Accessible Meeting Locations
  - All data is available at custom, user-defined geographies

# Languages in the Project Context



**Layers**

- TitleVI/OutreachZipCodes
- TitleVI/LanguageTracts
  - Language Tract
- TitleVI/AgeAndDisability
- Multimodal/MBTABus Stops
- Multimodal/MBTARoutes
- Multimodal/TrainStations
- Projects/HighwayProjects
- TitleVI/AccessibleMeetingLoca

**Tools**

- Select Features
- Street View
- Print
- Link

- Taking “Engage” tool to “Analyze”
  - Provide staff and project partners with data about transportation project impacts on protected populations.
- Risk based solution - identifying impacts will help MBTA staff to better understand the potential risks of Title VI or Environmental Justice related disparities on projects.