



BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

Monica Tibbits-Nutt, MPO Chair | Secretary and CEO, Massachusetts Department of Transportation
Tegin Leigh Teich, Executive Director, MPO Staff

WORK PROGRAM

MBTA 2026 TRIENNIAL TITLE VI PROGRAM

JUNE 26, 2025

Proposed Motion

The Boston Region Metropolitan Planning Organization (MPO) votes to approve this work program.

Project Identification

Unified Planning Work Program (UPWP) Classification

Agency and Other Client Transportation Planning Studies and Technical Analyses

Project Number 11507

Client

Massachusetts Bay Transportation Authority (MBTA) and Massachusetts Department of Transportation Office of Diversity and Civil Rights
Client Supervisor: Gregory Sobczynski

Project Supervisors

Principal: Rose McCarron
Manager: Bradley Putnam

Funding Source

Future MBTA Contract

Schedule and Budget

Schedule: 24 months from notice to proceed

Budget: \$165,962

Schedule and budget details are shown in Exhibits 1 and 2, respectively.

The overhead rate used to calculate the budget is subject to change every July 1st based on the approved projected overhead rate for the state fiscal year (SFY).

Relationship to MPO Work

This study is supported in full with non-MPO funding. Committing MPO staff to this project will not impinge on the quality or timeliness of MPO-funded work.

Background

Every three years, the MBTA submits a program to the Federal Transit Administration's (FTA) Office of Civil Rights detailing the MBTA's efforts to comply with Title VI of the Civil Rights Act of 1964. The purpose of this Title VI program is to ensure that, as a recipient of federal funds, the MBTA provides a comparable level and quality of transportation services to all customers without regard to race, color, or national origin. The requirements for demonstrating compliance with Title VI are outlined in FTA Circular 4702.1B (referred to as the Title VI Circular hereafter).

The MBTA submitted its most recent triennial Title VI program to the FTA in 2023. For years in which the MBTA does not submit a triennial program, the MBTA completes annual Title VI monitoring and internal reporting to identify and address problems early and to ensure ongoing Title VI compliance. Under the MBTA's service-monitoring schedule, data collection and analysis are completed annually for most service indicators and every two years for others. When possible, the results of annual monitoring are reported in subsequent triennial Title VI programs for the FTA. The most recent triennial program outlined an ongoing process of Title VI data collection and analysis, documented the results of current assessments of compliance, and indicated responsive action that would be taken with respect to Title VI concerns in the interim years (2024 and 2025) before the issuance of the 2026 program.

Central Transportation Planning Staff (CTPS) has performed data collection and analysis for MBTA Title VI reporting since the 1980s, and has been responsible for producing the MBTA's Title VI triennial programs for submittal to the FTA since 2005. CTPS has also completed annual internal reports for the MBTA since 2005, and quarterly reports for the FTA, as required. This work program represents a continuation of CTPS's involvement in the MBTA's Title VI monitoring efforts.

Objectives

The primary objective of this work is to produce a triennial Title VI program for the MBTA that meets all of the requirements set forth in the Title VI Circular. The MBTA's triennial Title VI program is comprehensive documentation of all of the MBTA's Title VI activities in the past three years. To produce the program, CTPS will work closely with the MBTA to collect and analyze transit service data as they relate to minority populations within the MBTA's service area. CTPS will submit a draft program to the MBTA by February 2, 2026 and a final program by March 2, 2026.

Work Description

In addition to the general reporting requirements, the Title VI Circular sets forth a specific set of reporting requirements for transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an urbanized area with a population of 200,000 or more. As one of these transit providers, the MBTA is required to collect and report data through a series of demographic and service profile maps and charts, monitor and report transit service through comparative analysis based on the MBTA's service standards and service policies, and evaluate major service and fare changes.

CTPS will collect data for the comparative analysis of transit service according to the MBTA's service-monitoring schedule. Most indicators are monitored annually, while some are monitored every two years. The analyses conducted for the 2026 Triennial Title VI Program will utilize the most recent data available for each of the indicators.

Task 1 Document Fulfillment of General Reporting Requirements

The Title VI Circular includes general reporting requirements that are completed by departments within the MBTA. These include public notification of protection under Title VI, Title VI complaint procedures and forms, a policy for providing access for limited-English-speaking populations, and equity analyses for evaluating the siting of proposed transit facilities. The MBTA will provide CTPS with documentation related to these general reporting requirements, and CTPS will design and lay out these elements to be incorporated into the MBTA's 2026 Triennial Title VI Program.

Product of Task 1

Documentation of the fulfillment of FTA general reporting requirements

Task 2 Produce Demographic and Service Profile Maps and Charts

CTPS will produce the following maps, overlays, and summary statistics for the MBTA service area by census tract using demographic data from the 2020 Census. CTPS will also provide narrative explanations of the maps. This task will consist of the following steps:

- Produce a base map of the MBTA's service area that includes each census tract, major streets and highways, the MBTA's fixed-guideway services, and MBTA stations.
- Produce demographic maps displaying all of the above, highlighting the census tracts that are defined as predominantly minority or predominantly low-income.
- Summarize statistics on the number and percentage of minority and low-income populations in each census tract.

- Produce additional overlays to the demographic maps showing all of the following:
 - MBTA yards, garages, maintenance facilities, and administrative buildings; highlighting those that were recently modernized or are scheduled for modernization in the next five years
 - Major activity centers or other transit trip generators, including central business districts, outlying high-employment areas, schools, and hospitals
 - The locations of bus shelters
- Produce additional maps and summary statistics as needed.

Products of Task 2

Base maps, demographic maps, and all required map overlays, as well as summary statistics and written descriptions and interpretations of the maps and overlays

Task 3 Monitor Service Performance

CTPS will combine data on MBTA service with passenger survey data to assess the performance of MBTA services as described in the MBTA's Service Delivery Policy.

Subtask 3.1 Document Service Standards and Policies

For the service-monitoring analysis, CTPS will first document the MBTA's service standards and service policies as specified in the Title VI Circular. CTPS will use existing documentation when available and will work with the applicable MBTA departments to document additional service standards and service policies, as necessary.

Subtask 3.2 Collect Service-Monitoring Data

For each of the indicators specified in the Title VI Circular, CTPS will either directly collect data to perform the required service-monitoring analyses described in Subtask 3.3 below or will work with the MBTA to obtain the necessary data. Data collection activities that are not described here will be completed by the MBTA, and the results will be provided to CTPS for inclusion in the final program. The data sources are as follows:

- *Vehicle Load*: CTPS will use SFY 2025 bus and commuter rail vehicle-load data compiled by the MBTA.
- *Vehicle Headway*: CTPS will use SFY 2025 bus, rapid transit, and commuter rail vehicle-headway data compiled by the MBTA.

- *On-Time Performance:* CTPS will use SFY 2025 bus, rapid transit, and commuter rail vehicle on-time performance data compiled by the MBTA.
- *Service Availability:* CTPS will determine the availability of transit service to all customers in the MBTA's service area.
- *Span of Service:* CTPS will use SFY 2025 span of service data compiled by the MBTA for bus, rapid transit, and commuter rail.
- *Platform Accessibility:* For gated rapid transit stations, CTPS will use SFY 2025 elevator operability data provided by the MBTA to measure the percentage of platform hours that were accessible in each station. For commuter rail stations, CTPS will use station accessibility data provided by the MBTA.
- *Service Operated:* CTPS will use the MBTA's SFY 2025 data on dropped bus trips and canceled commuter rail trains, and SFY 2025 rapid transit Daily Service Reports.
- *Transit Amenities:* CTPS will monitor the following transit amenities in the context of this work program: the distribution of bus shelters and benches; condition of bus shelters; the condition of rapid transit and commuter rail stations, including provision of benches, timetables, trash and recycling receptacles, system and line maps, neighborhood maps, and variable message signs; operability of fare gates and fare vending machines; distribution of fare card retail sales terminals; and operability of station escalators.
 - CTPS will use data that were collected as part of the MBTA's 2024 Title VI monitoring program for the distribution of amenities at rapid transit and commuter rail stations.
 - CTPS will use data that were collected as part of the MBTA's 2025 Title VI monitoring program for the location and condition of bus shelters and the distribution of bus shelter amenities.
 - The MBTA will provide data on the condition of rapid transit and commuter rail stations and the location and operability of all other amenities to CTPS.
- *Vehicle Assignment:* For bus vehicle assignment, CTPS will obtain MBTA bus assignment and maintenance records for one sampled day in SFY 2025. For commuter rail vehicle assignment, CTPS will obtain commuter rail vehicle age data from the MBTA.

Subtask 3.3 Conduct Service-Monitoring Analyses

For each of the indicators specified in the Title VI Circular, CTPS will use the data discussed in Subtask 3.2 to assess the performance of all services by applying the service standards and policies documented in Subtask 3.1 and comparing the performance of predominantly minority routes with the performance of predominantly nonminority routes. If the assessment shows a potential disparate impact on the basis of race, color, or national origin, CTPS will work with the MBTA to determine why the disparity exists and will assist in developing corrective actions to remedy the disparity to the extent possible. CTPS will include in the program a discussion of any corrective actions.

Products of Task 3

Summaries from the MBTA's service standards and policies, tables and charts displaying collected data and results from service-monitoring analyses, and written descriptions of all procedures and findings

Task 4 Document Service and Fare Equity Analyses

Since the submittal of the MBTA's 2023 Triennial Title VI Program, CTPS has conducted a fare equity analysis for low-income fares. The following documentation will be included in the MBTA's 2026 Triennial Title VI Program:

- Any additional service or fare equity analyses that may be performed before completion of the work outlined in this work program
- The MBTA board's approval of each service and fare equity analysis
- The public engagement process for setting the Service and Fare Change Equity Policy
- The MBTA board's approval of the Service and Fare Change Equity Policy

Product of Task 4

Documentation of any service or fare equity analyses that have been completed since the submittal of the MBTA's 2023 Triennial Title VI program and the MBTA board's approval of those analyses

Task 5 Assemble the 2026 Triennial Title VI Program

In addition to the summary statistics, maps, and documentation produced in Tasks 1–4, CTPS will assemble and format all of the documentation provided by individual MBTA departments to produce the MBTA's Triennial Title VI Program. The program will have a cover with a graphical design and include graphical presentations of materials contained in the program, as appropriate. Subsequent to this submission, CTPS will provide follow-up assistance to MBTA staff to respond to issues raised by the FTA in its review of the MBTA's 2026 Title VI Program.

Product of Task 5

MBTA 2026 Triennial Title VI Program

Task 6 Provide Ongoing Technical Support to the MBTA

CTPS staff will provide ongoing technical assistance to the MBTA to address Title VI issues as necessary.

Product of Task 6

Technical support provided to the MBTA as necessary

Exhibit 1
ESTIMATED SCHEDULE
MBTA 2026 Triennial Title VI Program

Task	Month																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1. Document General Reporting Requirements	█																							
2. Produce Demographic and Service Profile Maps and Charts	█																							
3. Monitor Service Performance	█																							
4. Document Service and Fare Equity Analyses	█																							
5. Assemble the 2026 Triennial Program																								
6. Provide Ongoing Technical Support to the MBTA	█																							

Products/Milestones

A: MBTA 2026 Triennial Title VI Program

Exhibit 2
ESTIMATED COST
MBTA 2026 Triennial Title VI Program

Direct Salary and Overhead	\$164,762
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Task	Person-Weeks by Pay Grade								Direct Salary	Overhead (120.3%)	Total Cost
	G-9	G-8	G-7	G-6	G-5	G-2	G-1	Total			
1. Document General Reporting Requirements	0.0	1.0	2.5	2.0	0.0	0.0	0.0	5.5	\$9,649	\$11,608	\$21,257
2. Produce Demographic and Service Profile Maps and Charts	0.0	0.0	4.0	4.0	0.0	0.0	0.0	8.0	\$13,077	\$15,732	\$28,808
3. Monitor Service Performance	0.0	2.0	2.0	13.0	0.0	2.0	5.0	24.0	\$35,415	\$42,604	\$78,019
4. Document Service and Fare Equity Analyses	0.0	0.0	0.0	1.0	0.0	0.0	0.0	1.0	\$1,610	\$1,936	\$3,546
5. Assemble the 2026 Triennial Program	1.0	0.0	0.5	1.0	2.0	0.0	0.0	4.5	\$8,076	\$9,715	\$17,791
6. Provide Ongoing Technical Support to the MBTA	0.0	1.0	0.0	3.0	0.0	0.0	0.0	4.0	\$6,963	\$8,377	\$15,341
Total	1.0	4.0	9.0	24.0	2.0	2.0	5.0	47.0	\$74,790	\$89,972	\$164,762

Other Direct Costs	\$1,200
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Travel	\$1,200
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TOTAL COST	\$165,962
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Funding
 Future MBTA Contract

CIVIL RIGHTS NOTICE TO THE PUBLIC

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You are invited to participate in our transportation planning process, free from discrimination. The Boston Region Metropolitan Planning Organization (MPO) is committed to nondiscrimination in all activities and complies with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin (including limited English proficiency). Related federal and state nondiscrimination laws prohibit discrimination on the basis of age, sex, disability, and additional protected characteristics.

For additional information or to file a civil rights complaint, visit www.bostonmpo.org/mpo_non_discrimination.

To request this information in a different language or format, please contact:

Boston Region MPO Title VI Specialist

10 Park Plaza, Suite 2150

Boston, MA 02116

Phone: 857.702.3700

Email: civilrights@ctps.org

For people with hearing or speaking difficulties, connect through the state MassRelay service, www.mass.gov/massrelay. Please allow at least five business days for your request to be fulfilled.