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I. Overview

Title VI of the Civil Rights Act of 1964 provides 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 subject to discrimination under any program or activity receiving federal financial assistance.” To fulfill this basic civil rights mandate, each federal agency which provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements.

This document explains the Pioneer Valley Metropolitan Planning Organization (PVMPO) Title VI Program. The Pioneer Valley Metropolitan Planning Organization (PVMPO) is a cooperative body of ten signatories designated by the Governor to act as a forum for ensuring a Continuing, Cooperative and Comprehensive (often referred to as the “3C”) decision making of transportation investments within the region. The 3C framework followed by the PVMPO promotes the involvement by all levels of government, stakeholders and general public through a proactive public participation process.

This program, conducted in cooperation with the Massachusetts Department of Transportation (MassDOT), assures that Title VI requirements are fully met and that the PVMPO is compliant with federal guidelines and is responsive to the needs of Title VI beneficiaries. The PVMPO is committed and responsible for all civic rights compliance, including the federal Affirmative Action and Equal Employment Opportunity, the Americans with Disabilities Act and the Disadvantage Business Enterprise Programs, and state nondiscrimination provisions such as the Massachusetts Public Accommodation Law. The PVMPO Title VI Nondiscrimination Policy Statement is included with this program update (Appendix A).

For the purpose of this document, the PVMPO will reference specific guidance from the US Department of Transportation (U.S. DOT), the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA). The document is outlined based on the issued guidelines from parent agencies. In addition to this, the PVMPO followed the recommendations provided by MassDOT’s Office of Diversity and Civil Rights, which is the agency responsible for overseeing the PVMPO Title VI compliance.

II. General Requirements

[USDOT 49 CFR Part 21; FHWA 23 §CFR 200; FTA C4702.1B Chapter III]

A. Title VI Assurances

In accordance with 49 CFR Section 21.7(a), the PVPC signed the FTA Civil Rights Assurance and U.S. DOT Assurance statements are uploaded to the FTA's Transportation Electronic Award Management (TEAM) system (Appendix M). The PVMPO signed FHWA's assurances on January 15, 2013 (Appendix L) and updated these on June 18, 2014 .

B. Title VI Program Approval

The PVMPO FY2014 Title VI Program was submitted to the PVMPO for review on June 4, 2014 and approved on its meeting on June 18, 2014. A signed approval of the PVMPO FY2014 Title VI Program endorsement is presented at the beginning of this document.

On August 12, 2013 PVPC received a written determination from the Federal Transit Authority (FTA) that all Title VI requirements have been met (Appendix G). The next update to the Title VI program is due April 1, 2015.

C. Title VI Notice

The PVMPO employs a range of methods for promoting awareness of its processes and interest in Title VI concerns. The Title VI Notice is posted in all PVMPO's outreach media types, such as: legal notices, press releases, meeting notices, in emails and in the PVPC's website, among other locations and documents.

A list of the documents where the Title VI Notice is posted follows:

1. Press releases – used to invite the public to participate in workshops and meetings hosted by the PVMPO, and they are distributed to all major and most local newspapers in the region, as well as community organizations.
2. Legal notices – mostly used to announce public review of the PVMPO certification documents or their amendments and are placed in the Springfield Republican with translations to Spanish when appropriate. PVPC also publishes in Republican's El Pueblo Latino.
3. Major documents and publications are made available at major libraries in the region.
4. E-mail LISTSERV – a tool used to contact individuals about upcoming events, meetings, workshops and seminars and includes municipal officials, legislators, local and regional community and transportation activists, and interested citizens. The email listserv has is continually being updated and expanded as new community partners are identified.

5. PVPC's website (www.pvpc.org) -The Title VI notice is posted on all the website's pages and a link to a Title VI Policy specific webpage is also available. The website is used to post upcoming meetings, agendas, and meeting minutes, and promotes the website at all public discussions. The website includes access to all documents produced by the PVMPO, as well as links to other agencies, maps, local municipalities and data.
6. PVMPO draft documents – are circulated for public review. The final documents also include the Title VI notice.
7. PVTA provides Title VI notification to its bus riders through with posted notices (in English and Spanish) on all PVTA busses, and at public hearings/workshops, and in public notices.

The MPO uses the language recommended by MassDOT whenever appropriate. The language is specifically designed for flyers, newspapers, and email.

1. Flyer language: "This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Such services include documents in alternate formats, translated documents, assistive listening devices, and interpreters (including American Sign Language). For more information or to request reasonable accommodation and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER."
2. Newspaper language: "This meeting is accessible to people with disabilities and those with limited English proficiency. To request accessibility accommodations and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER."
3. Email language: "This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Such services include documents in alternate formats, translated documents, assistive listening devices, and interpreters (including American Sign Language). For more information or to request reasonable accommodations and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER. Please ask to speak with someone about the PROJECT NAME."

(Second section, below the instructions to unsubscribe) "Title VI Notice of Nondiscrimination: PVMPO complies with Title VI of the Civil Rights Act of 1964 and related federal and state statutes and regulations. It is the policy of PVMPO to ensure that no person or group of persons shall on the grounds of Title VI protected categories, including race, color, national origin, or under additional federal and state protected categories including sex, age, disability, sexual orientation, gender identity or expression, religion, creed, ancestry, veteran's status (including Vietnam-era veterans), or background, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by PVMPO. To request additional information about this commitment, or to file a complaint under Title VI or a related nondiscrimination provision, please contact PVPC's Title VI Specialist, 60 Congress Street Springfield, MA 01104-3419 413-781-6045 Fax: 413-732-2593 TTY/TDD: 413-781-7168

Website: <http://www.pvpc.org>.

In addition to this, Title VI Notice to Beneficiaries has been translated to other languages other than English with the support of MassDOT Office of Diversity and Civil Rights (ODCR). These notices are also available online, included in all PVMPO translated public documents and published in media other than English. A copy of the PVMPO's Title VI policy statement and notice is included in Appendix A of this document.

D. Title VI Complaints

As of today, the PVMPO does not have any active complaint, investigation or lawsuit against it that allege discrimination on the basis of race, color, and/or national origin since the time of the last submission. However, should an investigation, complaint, or lawsuit be filed against the PVMPO alleging such discrimination, the PVMPO has developed procedures to investigate and track Title VI complaints in coordination with MassDOT ODCR in compliance with the requirements established in 49 CFR Section 21.9(b).

An individual can request information related to the Title VI complaint procedures at our primary offices during regular business hours. Also, the procedures and related documents are readily available for download at the Pioneer Valley Regional Planning Commission's website (www.pvpc.org). The documents explain the procedures on how to file a Title VI complaint and are available in Microsoft Word and in Portable Document Format, or PDF. See Appendix B for a copy of the PVMPO Title VI Tracking Sheet, Appendix C for the PVMPO Title VI Complaint Procedures, and Appendix D for Complaint Forms.

MassDOT ODCR is working on the standardization of the complaint forms and procedures among its sub-recipients. The PVMPO is waiting for guidance on this matter. Once this step is complete, the PVMPO will have both the complaint form and the procedures available in other languages other than English.

III. Public Involvement and LEP

[42 USC 2000d et seq.; 49 CFR Part 21; Executive Order 12898; FHWA 23 §CFR 200; FTA C4702.1B

Chapter III, Section 4(a)(4), Section 8]

Public involvement overarches all phases of project development. From early stages of need assessment, the planning phase and programming of projects and final implementation. MassDOT also includes project development guidance in the 2006 Project Development and Design Guide and in subsequent policy and design directives. This chapter presents the public involvement techniques the PVMPO uses throughout the project cycle that addresses Title VI requirements. The complete PV Public Participation Plan is available online at www.PVPC.org.

A. Minority Representation in the PVMPO

A Memorandum of Understanding (MOU) was signed by the PVMPO members agreeing to work together in undertaking the comprehensive, continuing, and cooperative transportation planning process (3C process), required by the United States Department of Transportation under the provisions of section 134 of Title 23 of the United States Code, as amended, and those of Section 8 of Title 49 of the Federal Transit Act, as amended. The PVMPO membership consists of ten State, Regional, City and Sub-regional officials or their designees. In 2014 members of the MPO were asked to participate in a voluntary survey of race/ethnicity, age and income. A copy of the survey is included in Appendix P. This survey will also be extended to other venues and representative groups such as the Joint Transportation Committee.

Composition of the MPO:

The voting members of the Pioneer Valley Metropolitan Planning Organization consist of the following officials or their designee or alternate:

- the Secretary of the Executive Office of Transportation
 - the Administrator of the Massachusetts Highway Department
 - the Chairman of the Pioneer Valley Planning Commission
 - the Chairman of the Pioneer Valley Transit Authority Advisory Board
 - the Mayors of two of the three (3) urban core cities Holyoke, Chicopee or Springfield.

 - the Mayor or a Selectman of one of the following four (4) cities and towns outside of the three core cities: Agawam, Southwick, Westfield, West Springfield.

 - the Mayor or a Selectman of one of the following five (5) cities and towns: Amherst, Easthampton, Hadley, Northampton, South Hadley.
-

- a Selectman of one of the following fourteen (14) suburban and rural towns:
Belchertown, Brimfield, East Longmeadow, Granby, Hampden, Holland,
Longmeadow, Ludlow, Monson, Palmer, Pelham, Wales, Ware, Wilbraham

- a Selectman of one of the following seventeen (17) suburban and rural towns:

Blandford	Chester	Chesterfield
Cummington	Goshen	Granville
Hatfield	Huntington	Middlefield
Montgomery	Plainfield	Russell
Southampton	Tolland	Westhampton
Williamsburg	Worthington	

In order to facilitate the implementation of the 3C process and to expand involvement in the PVMPO functions, the Pioneer Valley Joint Transportation Committee was established by the MPO. The Advisory Committee provides a forum for broad public participation, technical and citizen input in the transportation planning process. It brings together public agencies, elected and appointed officials, transportation providers, environmental interests, technical experts, specialists, business persons and citizens concerned with transportation plans and programs.

The Advisory Committee membership consists of a broad and balanced spectrum of providers and users of any form of transportation. Any individual is welcome to participate in any open meetings of the Advisory Committee as a non-voting participant.

The JTC formed under provisions out-lined in the Memorandum of Understanding, is the prime policy advisory body regarding transportation planning issues to the Pioneer Valley Metropolitan Planning Organization (MPO). As such, the JTC is composed of the following:

1. One representative and one alternate from each of the 43 communities comprising of the Pioneer Valley Regional Planning district (Voting Members).
2. Staff representatives of the Pioneer Valley Planning Commission (Ex-Officio*).
3. A representative of the MassDOT Highway Division for District One and District Two as appointed by the Administrator of the Highway Division. (one Vote collectively)
4. A representative of MassDOT as appointed by the Secretary of Transportation (Ex-Officio*).
5. Representatives of the other appropriate state agencies as invited by the Secretary of Transportation (Ex-Officio*).
6. A representative of public and private institutions, consumer groups and associations appointed by either the PVPC or by the Administrator of the MASSDOT HIGHWAY DIVISION acting in consultation with the other signatories (Voting Member).
7. A representative of the Pioneer Valley Transit Authority (PVTA) (Voting Member).
8. A representative of Federal Highway Administration (FHWA) (Ex-Officio*)
9. Airport Representative (Voting Member)
10. Motor coach industry represented by Peter Pan (Voting Member)

11. Rail Freight industry represented by the Pioneer Valley Rail Road (Voting Member)
 12. University of Massachusetts (Voting Member)
 13. A representative designated by the Massachusetts Bicycle Coalition (MassBike), Pioneer Valley Chapter (Voting Member)
- * Ex-Officio members or representatives do not have voting status

B. Public Participation Plan

The Moving Ahead for Progress in the 21st Century Act (MAP-21), signed in July 2012, is the current transportation enabling legislation that emphasizes the importance of public involvement in the transportation planning process that was included in the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: a Legacy for Users (SAFETEA-LU) of 2005, the Transportation Equity Act for the Twenty-first Century (TEA-21) of 1998 and the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991. In addition, current regulation highlights the need to develop MPO public participation plans “in consultation with all interested parties.” (MAP-21 Section 1201 § 134 (i)(6)(B)(i)).

The PVMPO Public Participation Plan (PPP) is attached as Appendix E. The PPP was developed with input from a broad cross section of community stakeholders. Input on ways to improve outreach, communication, and feedback on transportation planning issues continues to be an ongoing evolving process as the PVMPO continues to reach out to nontraditional partners and works to design methods to reach a diverse and changing population. The PVMPO’s Public Involvement Statement summarizes the goals of the plan:

“ The Pioneer Valley Metropolitan Planning Organization (PVMPO) has a proactive public involvement process that provides complete information, timely public notice, and full public access to PVMPO activities at all key stages in the decision making process. The PVMPO involves the public early in the planning process, and actively seeks out the involvement of communities most affected by particular plans or projects. The Region’s transportation plans and programs are developed in a manner that assures that the public, and affected communities in particular, are consulted and afforded ample opportunity to participate in the development of such plans. ”

The PPP is the PVMPO’s plan for outreach in identifying needs, planning and project development. Through the Joint Transportation Advisory Committee, the PVMPO proactively monitors techniques in order to implement any necessary refinements that may be needed. The PPP has been amended several times in order to incorporate new initiatives and reinforce existing outreach activities.

In 2014 PVPC coordinated additional assistance from the MassDOT ODCR with regard to the redesign of the new web site. ODCR provided draft accessible IT contract language for the web site development. The language is still in draft form and

is not yet being used in MassDOT contracts, but it can provide a guidance to the IT accessibility standards.

Following MassDOT's guidance, the PVMPO will review its PPP to reflect the new protocols and strategies included in MassDOT's Public Participation Plan which at the date of the completion of this document, was still in its public comment phase. A list of meetings held by the PVMPO as requested by MassDOT is included in Appendix F.

C. Identification of Needs

The PVMPO has historically made a concerted effort to involve the region's disabled, elderly, low-income and minority populations. The PVPC has actively collaborated with a wide range of organizations in partnerships to identify and address local and regional transportation, public health and safety issues. The PVMPO engages a broad cross section of the community through these collaborations. Ongoing efforts such as the Plan for Progress, Sustainable Knowledge Corridor Project, Regional Transportation Plan, Welfare to Work Program and Regional Comprehensive Land Use Plan have created relationships with open lines of communication.

The PVMPO makes a concerted effort to involve and address the needs of individuals or neighborhoods with Limited English Proficiency. The PVMPO routinely conducts outreach with language barrier in mind.

Following the guidelines of MAP-21, PVMPO organizes the public participation to allow for consultation with organizations representing low income and minority populations and coordinated the transportation outreach into the meetings and schedules of these stakeholders. PVPC is actively involved in creating programs and projects that directly addressed local needs. The issues and concerns identified are incorporated into projects, programs and specific tasks through the Unified Planning Work Program, Transportation Improvement Program and the Regional Transportation Plan. Some these efforts, organizations and stakeholders consulted include:

a. The PVMPO (through PVPC) is also represented on the **Pioneer Valley Food Security Advisory Committee** ([Click here for the Pioneer Valley Food Security Plan](#)).

Other members of the Steering Committee include:

Western Mass. Enterprise Fund; Easthampton City Planner; Gardening the Community; Communities Involved in Sustaining Agriculture (CISA); Partners for a Healthier Community;

Springfield Food Policy Council; Department of Elder Affairs ; United Way Pioneer Valley ; Wintermoon Organic Farm ; City of Springfield, Planning Department ; Holyoke Food and Fitness Policy Council; MLK Jr Family Services; Nuestras Raíces; Massachusetts Public Health Association; City of Holyoke Planning and Economic Development; Food Bank of WMA; Holyoke Food and Fitness Policy Council; Mass Workforce Alliance; Concerned Citizen's of Mason Square Farmer's Market; Springfield Food Policy Council ; Office of Public Health Practice and Outreach UMass-Amherst;

PVGrows; Conservation Works LLC.

b. The PVMPO (through PVPC) has had strong coordination in the creation of the **Pioneer Valley Housing Plan**. During the creation of the plan it was very clear that transportation plays a substantial role in "place building" and determining life outcomes. Good schools, a healthy and safe environment, access to financially stable employment are the essential factors needed to succeed, thrive and excel in society. To quote a section of the plan; "In the Pioneer Valley too many families are stuck in isolated and economically segregated areas—both rural and urban—that lack access to quality jobs, schools, affordable housing, transportation, and cultural and physical amenities. There is a regional need to transform these areas in the Pioneer Valley into communities of opportunity to reduce social disparities and allow all residents to thrive." The Pioneer Valley Housing Plan can be viewed online ([Pioneer Valley Housing Plan](#).)

The Advisory Committee for the Pioneer Valley Housing Plan included: Office of Planning, Belchertown; Hilltown CDC; Office of Community Development, Easthampton; Massachusetts Fair Housing Center; Home Builders & Remodelers Assoc. of Western MA; Valley Community Development Corporation; Department of Housing and Community Development; Young Women's Christian Association; Office of Community Development, Chicopee; Fair Housing Program, Hap, Inc.; Amherst Housing Authority; Hilltown Community Development Corporation; Holyoke Housing Authority; Concerned Citizens of Springfield; Housing Director, City of Springfield; Holyoke Planning Dept.; Homeless Housing Coordinator, Mental Health Association, Inc.; Southwick Office of Planning; Springfield Neighborhood Housing Services Inc.; Dietz & Company; West Springfield Office of Planning.

c. **Live Well Springfield.** Live Well Springfield Movement is led by a coalition of over 20 local organizations that works in collaboration with, and complementary to, the work already underway with the statewide Mass in Motion campaign led locally through the City of Springfield Department of Health and Human Services. The current work includes the Go Fresh Mobile Farmer's Market, developing plans for a full line grocery store in Mason Square, rowing and biking programs on the Connecticut River at North Riverfront Park, and the development of a comprehensive plan for a more walkable/bikeable Springfield.

- [Caring Health Center](#)
- [City of Springfield Office of Elder Affairs](#)
- [City of Springfield Office of Planning and Economic Development](#)
- [City of Springfield Parks Department](#)
- [Concerned Citizens of Mason Square](#)
- [DevelopSpringfield Corporation](#)
- [Enterprise Farm](#)
- [Gardening the Community](#)

- [HAP Housing](#)
- [Health New England](#)
- [Mason Square Health Task Force](#)
- [Mass in Motion](#)
- [Mass Mutual](#)
- [Massachusetts Department of Public Health Western Region](#)
- [MassBike](#)
- [New North Citizens Council](#)
- [Partners for a Healthier Community](#)
- [Pioneer Valley Asthma Coalition](#)
- [Pioneer Valley Planning Commission](#)
- [Pioneer Valley Riverfront Club](#)
- [Springfield Housing Authority](#)
- [Springfield Partners for Community Action](#)
- [Springfield Vietnamese American Civic Association, Inc.](#)
- [University of Massachusetts Amherst](#)
- [Vietnamese Health Project/ Mercy Medical Center](#)

d. **Springfield Partners for a Healthier Community.** The mission of this broad partnership is to identify and implement policy and environmental changes to prevent and reduce obesity and early deaths from heart disease, stroke and diabetes in the Greater Springfield area. The Coalition assists in statewide efforts to make the “healthy behavior the easy behavior” in school, worksite, healthcare and community settings. The coalition’s efforts target the reduction of risk factors related to chronic diseases mentioned above, which are affecting the residents of Springfield. In partnership with the Brightwood Health Center, Springfield Partners, Baystate Medical Center, Springfield Dept. of Health and Human Services, Springfield Planning Department and Parks Department; PVPC successfully secured a grant from the Centers for Disease Control and Prevention (CDC) for a Community Transformation Grant.

e. Working in Springfield’s McKnight and Bay Neighborhoods to assess the potential for improving opportunities for physical activity that would address health concerns through improvements to the built environment. Working with the Springfield Planning Office, neighborhood residents, and the **McKnight Neighborhood Council**, PVPC created a scope of work for a feasibility study for a multi-use trail and greenway.

f. PVPC participated in the **Springfield Built Environment Group**. With a significant populations at risk for heart disease and stroke, Springfield faces significant health challenges. The Springfield Built Environment Group helped bring attention to the Springfield Riverwalk and Bikeway and much needed improvements and maintenance for the facility. The effort resulted in the a Governor's Legacy Park grant in the amount of \$1.3 million in state and matching funds, implementation of a

maintenance program, and repairs to an elevator for this inner city bikeway. This effort supports MassDOT mode shift goals of tripling biking, walking and transit use and addresses GreenDOT specific strategies for sustainable transportation in addition to other associated goals (better air quality, healthier communities, etc.).

g. In April of 2014 the Pioneer Valley Transit Authority (PVTA) held nine public meetings across the region to solicit comments on a proposed service recommendations. The PVTA's proposed service recommendations include new cross-town routes, improved hours of services, increased frequencies, and streamlined routes. Under the proposed system changes, some routes will be eliminated and bus stops on other routes will be removed. The report on recommendations from the Comprehensive Service Analysis is available online ([PVPTA Comprehensive Service Analysis](#)). Public meetings to review the proposed changes took place on the following dates and locations:

- April 2nd, Palmer Public Library, Palmer
- April 3rd, Mason Square Library, Springfield
- April 7th, East Longmeadow Senior Center, East Longmeadow
- April 8th, South Hadley Town Hall, 116 Main St, South Hadley
- April 8th, Chicopee Public Library, Chicopee
- April 9th, Agawam Senior Center, Agawam
- April 9th, Northampton Council Chambers, Northampton
- April 10th, Wilbraham Town Hall, Wilbraham
- April 14th, Amherst Town Hall, 4 Boltwood Ave, Amherst



PVTA Public Meeting in Northampton MA on April 10, 2014

The PVMPO continues to work with our partners to identify the needs of minority groups in the past, has been through its outreach process for the development of the Regional Transportation Plan (RTP). The RTP will be in 2015 and the PVMPO will develop a regional outreach strategy.

Of particular importance has been the training in cultural diversity the PVMPO staff has been involved in, in order to tailor outreach strategies to the region's cultural variances. Recent training opportunities have include:

- Dec 6, 2013; Undoing Racism Training at PVPC in Springfield conducted by the People's Institute in Springfield MA. The training included a historical and institutional analysis of racism; understanding the structure of oppression; defining and sharing culture; leadership development; principles of accountability and networking; and developing a common language, definition and analysis for examining racism in the U.S.
- August 22, 2013; Full day Cultural Competency Training at PVPC in Springfield, MA conducted by the People's Institute. The People's Institute is a national multiracial network of anti-racist organizers and educators dedicated to building a movement for justice by ending racism and other forms of institutional oppression.
- February 19, 2014; Workshop on Cultural Sensitivity at PVPC in Springfield, MA
- May 5, of 2014; PVPC with Live Well Springfield Partners co-sponsored a presentation by Dr. David Williams at the Naismith Basketball Hall of Fame regarding Race and Health Disparities ([Click here to see a link to Dr. Williams presentation](#)). Dr. Williams is the Florence Sprague Norman and Laura Smart Norman Professor of Public Health and Professor of African and African American Studies at Harvard University and has done extensive work examining inequality. Dr. William's research provides strong direction for improving health and reducing racial disparities Pioneer Valley Communities.

D. Limited English Proficiency

The PVMPO makes a special effort to seek out and consider the needs of individuals or neighborhoods with Limited English Proficiency. The PVMPO engages persons with LEP with regard to region wide planning activities such as the adoption of the Regional Transportation Plan, Unified Planning Work Program, transit studies, or an updated TIP. The PVMPO outreach to Spanish speaking residents is a routine undertaking. Meeting notices are available upon request in Spanish, with an opportunity to request translator services highlighted in the notice. Important reports are summarized and translated into Spanish upon request. With regard to special activities focused on a specific neighborhood or corridor, maps depicting the distribution of non-English speaking persons will be consulted at the beginning of any such project to determine what, if any, special outreach in any language other than English should be undertaken. If it is determined that a special outreach is warranted,

PVMPO consults with neighborhood groups such as ethnic and religious associations to determine the best method for reaching and involving those non-English speaking residents.

Executive Order 13166, issued in 2000, expanded the impact of the 1964 Civil Rights Act and responded to the concern that persons with limited English proficiency deserve equal participation in the transportation planning process. In accordance with the Executive Order, the U.S. DOT issued the *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons*, which is modeled after the U.S. Department of Justice's general LEP policy guidance document. As described in the guidance, DOT recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

PVPC developed an LEP plan that was reviewed and approved by FTA in 2013 (Appendix G). The PVMPO utilizes the four-factor analysis to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to transportation planning information within the region. The four-factor analysis is based on FTA guidance as published in April 13, 2007 entitled "*Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.*" A copy of the PVMPO LEP plan is included as Appendix H.

PVMPO's prior experience with LEP individuals is extensive. The region includes communities with diverse ethnicities, including many people for whom English is not their native language. It has been helpful in recent instances where PVMPO staff has shared cultural backgrounds with ethnic groups in the region. To expand on the strengths of diversity in our staff, PVPC conducted a language literacy assessment in 2014. A database of staff and the languages spoken was compiled.

The PVMPO is engaged with a wide range of community based organizations that serve LEP persons through participation in meetings of organizations and agencies that deal with LEP issues and through public outreach activities. PVMPO staff participates on an ongoing basis in the meetings and activities of the community and municipal organizations as highlighted in the "Identification of Needs" section "C." Other regularly scheduled coordination efforts include:

- Pioneer Valley Joint Transportation Committee Meetings
- Pioneer Valley Planning Commission Meetings
- Pioneer Valley JTC Bicycle and Pedestrian Advisory Committee
- Mass In Motion Meetings
- Connecticut Riverwalk and Bikeway Task Force Meetings

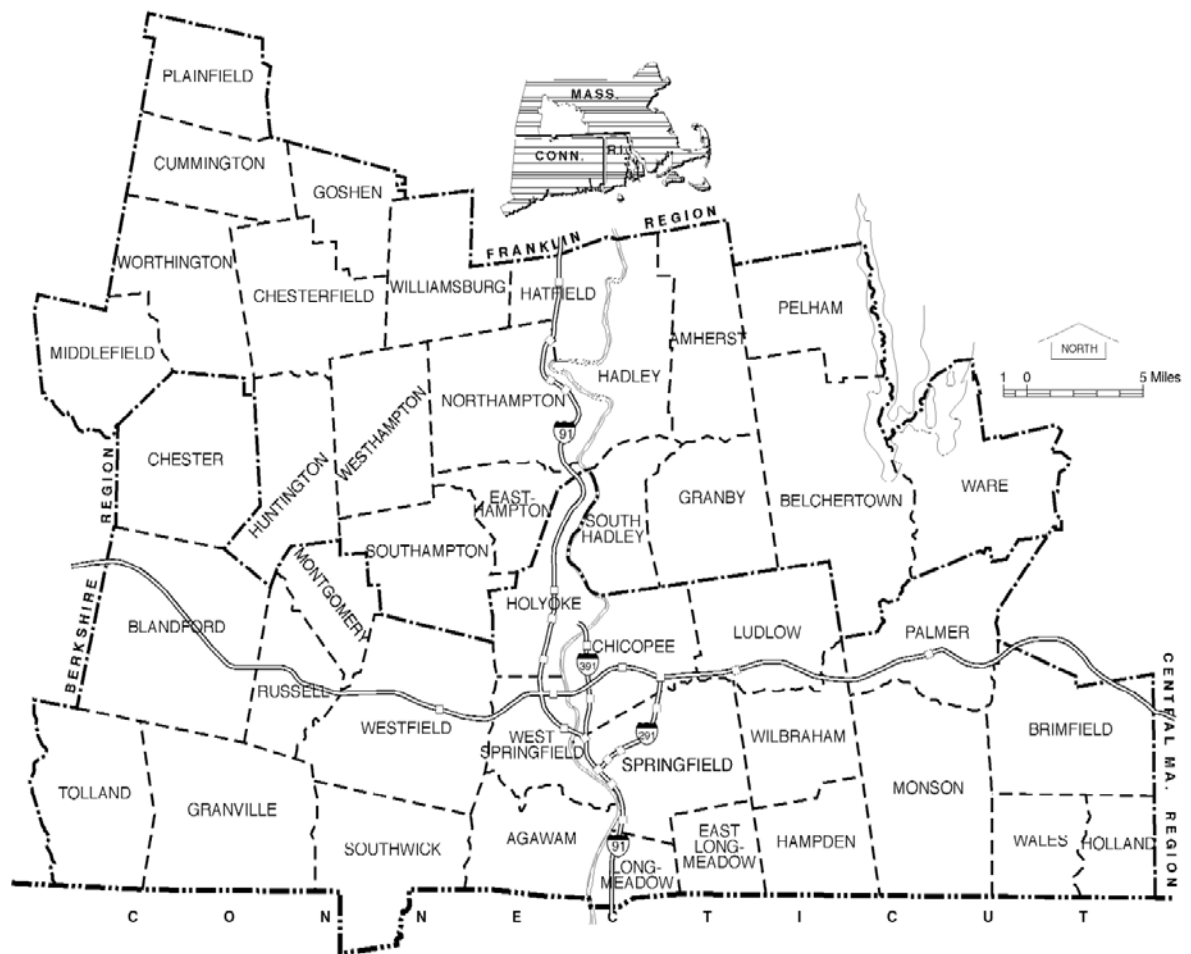
IV. Demographic Profile

[FTA C4702.1B Chapter VI, Section 2(a)(2)]

The PVPC region is composed of the 43 municipalities of Hampden and Hampshire Counties shown Figure 1. The estimated population of this region in 2010 was 621,570. The region measures 1,179 square miles and includes a mix of urban, suburban and rural communities. The majority of the PVPC region is within the Springfield, Massachusetts Metropolitan Statistical Area (MSA). For the purpose of Title VI demographic impact analysis the MPOI uses the definition of “minority” and “low-income” geographic areas that was approved by FHWA for the PVMPO. The full method and application is described in the PVMPO Regional Transportation Plan 2011. The PVMPO region is comprised by 43 municipalities show below in Figure 1.

Figure 1

43 Communities Comprising the Pioneer Valley Region



1. Minority Populations

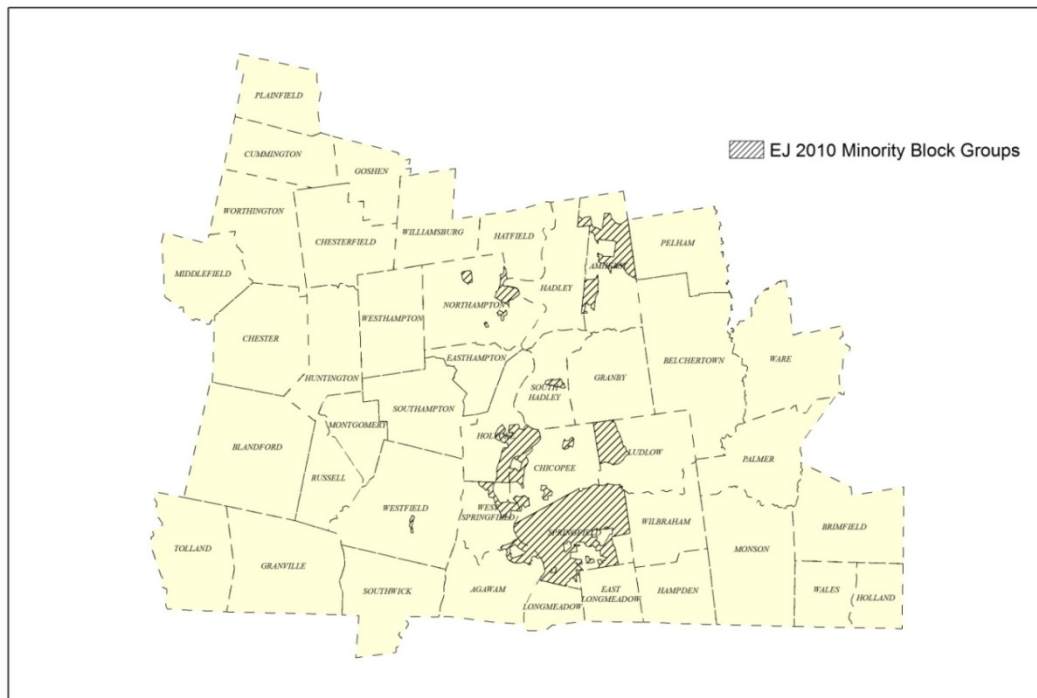
The PVMPO method defines “minority” as “the population that is not identified by the census as White-Non-Hispanic” in the 2010 US Census. The racial or ethnic groups included are:

- White Non-Hispanic
- African-American or Black
- Hispanic or Latino (of any race)
- Asian (including Native Hawaiian, & other)
- American Indian (& Alaska Native)
- Some other race
- Two or More Races.

Of the PVMPO region’s 621,570 residents (US Census 2010), 23.48 percent meet this definition of minority. When this analysis was applied to the census block groups in the region, the finding was that there are 163 block groups with a minority population greater than the regional average (23.48). Summary results are shown in Figure 2.

Figure 2

Census Block Groups with Minority Populations Exceeding Regional Average of 23.48%
 Source: ACS 2006-10 (2010 based Census geography using Transportation macro)



The PVMPO method defines a “low income” areas as one with a proportion of people living at or below the federally defined poverty level that exceeds the proportion of people in poverty in the region as a whole, which is 15.47%. This analysis was also applied at the census block group geographic level and is shown in Figure 3.

For the purpose of Title VI demographic impact analysis data was applied at the census block group geographic level and shown in Figure 3.

Figure 3
 Census Block Groups with a Poverty Rate Exceeding the Regional Average of 15.47%
 Source: ACS 2006-10 (2010 based Census)

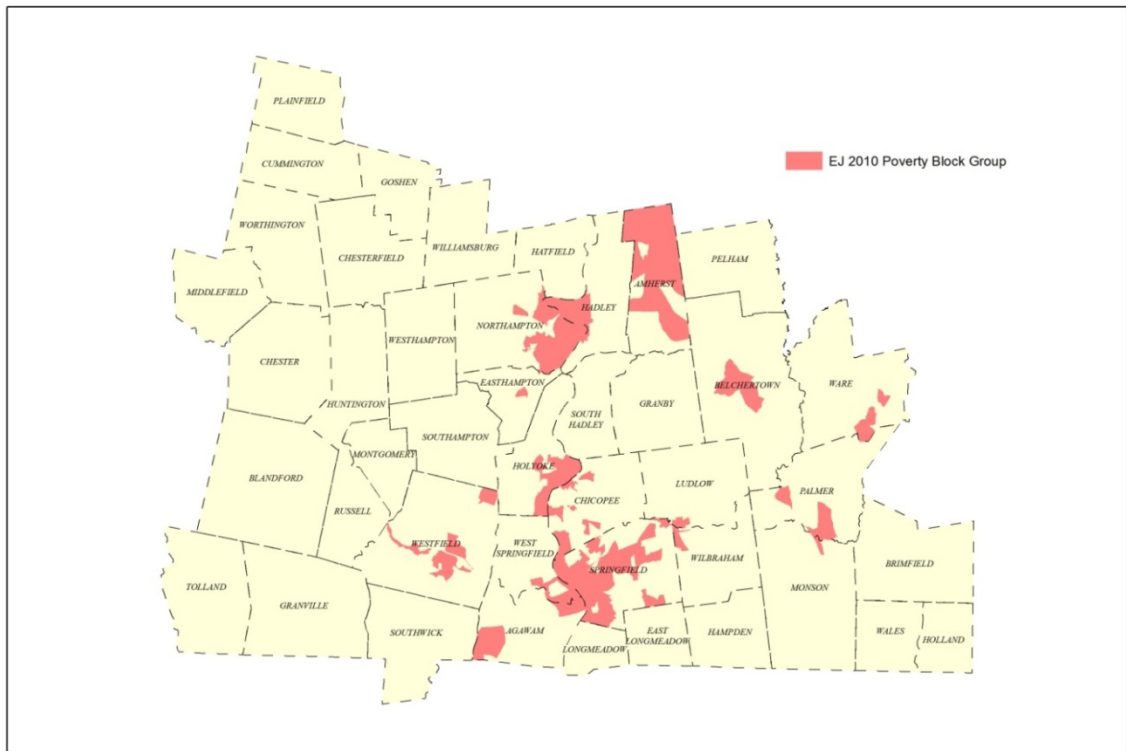


Table 1 - Pioneer Valley Population by Race

Race	Population	Percent
White alone	494,830	79.61%
Black or African American alone	45,569	7.33%
American Indian and Alaska Native alone	2,199	0.35%
Asian alone	16,303	2.62%
Native Hawaiian and Other Pacific Islander alone	286	0.05%
Some other race alone	45,201	7.27%
Two or more races	17,182	2.76%
Total	621,570	100.00%

Table 2 - Pioneer Valley Non-Hispanic or Latino Population Breakdown

Race	Population	Percent
Not Hispanic or Latino:	517,339	100.00%
White alone	450,095	87.00%
Black or African American alone	39,239	7.58%
American Indian and Alaska Native alone	959	0.19%
Asian alone	16,060	3.10%
Native Hawaiian and Other Pacific Islander alone	155	0.03%
Some other race alone	931	0.18%
Two or more races	9,900	1.91%

Table 3 - Pioneer Valley Hispanic or Latino Population Breakdown

Race	Population	Percent
Hispanic or Latino:	104,231	100.00%
White alone	44,735	42.92%
Black or African American alone	6,330	6.07%
American Indian and Alaska Native alone	1240	1.19%
Asian alone	243	0.23%
Native Hawaiian and Other Pacific Islander alone	131	0.13%
Some other race alone	44,270	42.47%
Two or more races	7,282	6.99%

Source: U.S. Census Bureau, Decennial Census 2010 (not ACS 2006-10)

The PVMPO’s Environmental Justice population for minorities is defined by using census block group data “in which the percentage of minorities is greater than the percentage of minorities in the entire region,” as agreed upon by the PVMPO’s Joint Transportation Committee in January of 2003.

2. Low-income Populations

PVMPO relies on a definition of “low income” based on the federal definitions of "poverty." Annual household income levels associated with this federal definition are shown below.

Table III-A-2-1 Low-income Definitions

Household Size	Federal Poverty Level
1 person	\$8,500
2 persons	\$10,800
3 persons	\$13,290
4 persons	\$17,000
5 persons	\$20,000

The PVMPO method defines a “low income” area as one with a proportion of people living at or below this federally defined poverty level that exceeds the proportion of people in poverty in the region as a whole, which is 15.4%. This analysis was also applied at the census block group geographic level and is shown in Figure 3.

V. Planning and Project Selection Process

[FTA C4702.1B Chapter VI, Section 2(a)(3)]

The PVMPO is responsible for endorsing official transportation policy and the development of regional planning documents, including a long-range Regional Transportation Plan (often referred to as an RTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), Congestion Management Program (CMP), and developing a broad Public Outreach Program. All these planning activities require early involvement of local legislators, chief local officials, stakeholders, citizens and other interested parties with full consideration of the principles of Title VI and also Environmental Justice.

The PVMPO relies on a three-step process to assess the benefits and burdens of transportation system investments for low-income populations and minority populations.

These steps include:

1. Identification of transportation investments programmed through the Transportation Improvement Program (TIP) and Regional Transportation Plan (RTP).
2. Scoring and prioritization of programmed TIP projects.
3. Analysis of programmed TIP project locations in relation to census block groups (defined as by the percentage of low-income and/or minority residents that exceed the regional average) to determine the relative distributional equity of programmed transportation investments.

The prioritization process uses a “Transportation Evaluation Criteria” (TEC) set forth by MassDOT predecessor organizations and is utilized in the development of the TIP project listings. Potential regional target-funded projects are evaluated when considered for programming. The results of the evaluation, along with other critical benchmark data concerning project status and readiness, are used to assist in the selection of TIP target projects for review and eventual approval by the PVMPO. This is a continuing, cooperative process among the RPAs, RTAs, MassDOT and its Highway Division

district offices. At this time the PVMPO is considering revisions to the TIP scoring process.

During each TIP cycle the MPO staff conducts an analysis of the distribution of projects and funding to determine the project's impacts on minority and low-income population. A map of this analysis is included in Appendix I and available online ([PVMPO TIP Project Map for Title VI 2014-2017](#)).

Continued to Appendix