



Merrimack Valley Transit

Title VI Program



Updated March 2025



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Title VI Program Components

I. Public Notification of Protection under Title VI

The purpose of Title VI of the Civil Rights Act of 1964 is to prevent the denial, reduction or delay of benefits and services to minority populations, provide participation by affected populations in transportation decisions, and to ensure that the policies and programs of public agencies avoid producing disproportionately negative effects on minority populations.

Merrimack Valley Transit (MeVa) fully complies with Title VI, and related statutes and regulations, in performing all services, programs and activities. MeVa operates without regard to race, color, national origin, gender, age, or disability. A "Notice of Public Protection Against Discrimination" has been made available to the general public in English, Spanish, Haitian Creole, Portuguese, and Simplified Chinese, as required under the Safe Harbor Thresholds for MeVa's LEP populations. A copy of the notice is contained within this document as Appendix A.

This notice is posted in the following locations:

- MeVa's website at <https://mevatransit.com/title-vi-policy/>
- MeVa Headquarters in the reception area and drivers' lounge (85 Railroad Avenue, Haverhill, MA)
- The McGovern Transportation Center in Lawrence (211 Merrimack St.)
- The Washington Square Bus Hub in Haverhill (Washington Sq.)
- The Costello Transportation Center in Amesbury (68 Elm Street)
- In all transit vehicles and bus shelters

II. Complaint Procedures

Any person who believes that they, individually or as a member of any specific class of persons, has been discriminated against on the basis of race, color, or national origin by Merrimack Valley Transit (hereinafter referred to as MeVa) may file a complaint with MeVa within 180 days of the date of the alleged discriminatory act.

To file a complaint, submit MeVa's Title VI complaint form. A complete copy of the Complaint Form and instructions are provided in Appendix B. This form, along with basic filing procedures, is also posted on our website at <https://mevatransit.com/title-vi-policy/> in all five languages mentioned above.

All complaints are processed in accordance with MeVa's Complaint's Procedures (attached for reference in Appendix B). Any Title VI Complaint Form received by email or thru the postal service, will be logged per usual and then forwarded to MeVa's Chief Compliance Officer. Once the complaint is received, the complainant will receive an acknowledgement, by their chosen contact method as noted on the form, informing them on whether or not the complaint will be investigated. If an investigation is conducted, MeVa will respond within 30 days of receipt of the complaint.



A. Investigation of Title VI Complaints:

Within seven (7) days, should the complaint have merit, MeVa shall commence an investigation of the allegation(s). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI has occurred.

Investigations will follow the same process as ADA complaints, except that final decision on the findings of the investigation are the responsibility of MeVa's Chief Compliance Officer. MeVa's Deputy Administrator will act as backup in these duties.

If additional information is needed during the course of the investigation, the complainant may be contacted. The complainant will have no more than five (5) business days from the date of the request to respond with the needed information. If this information is not received, causing the investigation to become unresolvable, the complaint will be administratively closed. The complainant can also request that the complaint be administratively closed.

B. Resolution of Complaints:

If a probable cause of discriminatory practice based on race, color or national origin is found to exist, MeVa shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Action Plan shall include: a list of corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency and its operators will implement the accepted corrective action in the manner discussed in the plan. Incidents that are caused by the actions of a single staff person violating company policy shall be handled with the appropriate remedial or disciplinary action.

Within thirty (30) days, MeVa will notify the complainant in writing of the final decision reached, including any proposed resolution. A complaint may be resolved by administrative closure if the incident is found to not violate Title VI. The complainant will either receive a closure letter or a notice of findings and resolution.

If the complainant is dissatisfied with the final decision rendered, they have a right to file a complaint with the FTA directly. The decision letter will notify them of this right and how to proceed if necessary.

III. Title VI Investigations/Complaints/Lawsuits

MeVa has not had any transit-related complaints, lawsuits or investigations related to discrimination since the last Title VI submission. No complaint forms were received nor did any general complaints contain content that could be classified as violating Title VI. The complaint log is kept at the MeVa administrative offices at 85 Railroad Avenue, Haverhill, MA 01835.

IV. Promoting Inclusive Public Participation

MEVA seeks out and integrates the needs and views of its transit customers, especially those of minority, low-income and Limited English Proficiency (LEP) populations—people who may have comparatively fewer resources to present their concerns about transit.



A. Development of Projects

MEVA has adopted the Merrimack Valley Metropolitan Planning Organization's Public Participation Plan (PPP). The most updated plan can be downloaded by MVPC's website at: https://mvpc.org/wp-content/uploads/2025_01_22_2025_Approved_PPP.pdf. In doing so, notices about MeVa's Program of Projects (POP) for capital investments funded through the Federal Transit Administration are regularly communicated to a list of over 1,200 individuals and organizations, which include many organizations representing the interests of minorities, people with disabilities and LEP.

B. Locally Developed Process for Raising Fare or Major Reduction in Service

MEVA uses the PPP as a guide for its own outreach efforts to encourage public participation, but because of the nature of its service, it provides outreach opportunities that go beyond the PPP. The list below outlines the steps that the MEVA follows in its outreach process to engage transit riders in the decision-making process for major service and fare changes. A service change is used as an example:

1. A service change proposal is developed internally or as a result of public comment. This includes following procedures to determine whether or not a hearing is required;
2. The proposal is presented to the Fixed Route Services Sub-Committee;
3. A Title VI review of the proposal is conducted to determine whether or not a formal public engagement process is required (minor vs major change).
4. If it determined that public engagement is required, the following steps are taken:
 - Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the service area;
 - Bilingual (English and Spanish) public outreach materials and program are developed. Materials may be translated in additional languages based on LEP populations that may be impacted by service change.
 - Public comment period opens and is advertised.
 - Notices and other information are disseminated.
 - Public comment period ends.
 - Fixed Route Services Sub-Committee to vote on the final plan, inclusive of public comment.
 - The Advisory Board is presented with the final service change based on public review and affirmative vote of the Fixed Route Services Sub-Committee.
5. Upon approval by the Advisory Board, outreach is conducted to inform the public of planned changes. Outreach includes:
 - Notices at all transit stations (English, Spanish, Haitian Creole, Portuguese, and Simplified Chinese languages);
 - Notices on all buses (English, Spanish, Haitian Creole, Portuguese, and Simplified Chinese languages);
 - Notice in Spanish and English newspapers;
 - Announcements on Facebook (English - translatable with AI tool)
 - Notices posted on website (translatable with tool)



- Posted internally in drivers' lounge so all operations staff are made aware of the service changes. They represent the face of MEVA and answer questions throughout the day. Because many staff members are bilingual, they are able to easily communicate with customers.

C. Scheduled Outreach Opportunities

A comprehensive table of MEVA's outreach activities between April 1, 2022 and March 1, 2025 is included in Appendix C.

V. Limited English Proficiency (LEP)

A key factor in meeting the goal of equal service for everyone is the ability of our consumers to understand all the services which MeVa has to offer. To accomplish this MeVa has established a comprehensive plan to provide understanding and access to those potential consumers who may have limited proficiency in the English language. A full copy of the plan is attached herein as Appendix D.

VI. Minority Representation on Planning and Advisory Bodies

MEVA has an Advisory Board, the membership of which is determined according to the requirements of Chapter 161B Massachusetts General Laws. Voting is determined according to the formula contained in Chapter 161B. Under Chapter 161B, the Chief Elected Official of each community is a member of the Advisory Board. Designees of the Chief Elected Official are often high-level staff or department heads who report to the Chief Elected Official. The Board is empowered to adopt an annual budget, approve changes in fares and approve substantial changes in service. In addition to voting members, one representative of the disabled community and a transit rider representative are chosen by member communities on an annual rotating basis to attend and participate at the board meetings as a voting member. Since MeVa's Advisory Board is the only decision-making body governing us, and is composed of elected officials; MeVa has not enclosed a table depicting the racial breakdown of the board membership.

VII. Title VI Equity Analyses for Construction of Facilities.

From 2022-2025, the MEVA did not construct any new vehicle storage, maintenance facilities or operation centers.

VIII. Title VI Program Approval

A presentation of the Updated Title VI Program was given to the Fixed Route Services sub-committee of the MeVa Advisory Board on March 31, 2025. MeVa's Administrator, who is empowered with policy making decisions by the Board, approved the updated program thereafter.



IX. Service Standards & Policies

Appendix C to 49 CFR part 21 provides in section (3)(iii) 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 a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”

FTA requires all transit providers, regardless of operating budget, to develop quantitative standards for the indicators listed below:

- Vehicle load
- Vehicle headway
- On-time performances
- Service availability

FTA requires transit providers, regardless of total annual operating budget, to develop a policy for each of the following service indicators:

- Distribution of Transit Amenities
- Vehicle assignment

A complete copy of MeVa’s Service Standard and Transit Policies are included in Appendix E.

X. Additional Requirements

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must incorporate the following additional information in their Title VI Program.

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

MeVa is located in a large urban area but does not yet operate 50 or more fixed route vehicles in peak service. However future service changes planned for FY26 will likely increase our current peak load of 42 vehicles above to 50 or more. MeVa is aware of the above requirements and is in the process of creating the three policies and the monitoring program. Demographic and service profile maps have already been created and are attached to this program in Appendix F.



The last bulleted requirement above has already been completed. MeVa has been a fare free system since March 2022 and has spent the last 6 months conducting a service and fare equity analysis to evaluate our fare free system and present to our board these analyses in the hopes of their continued support of no fares. The fare-free study was conducted in conjunction with the local regional planning commission and a 3rd party consultant. The results proved the invaluable benefits of our system and the impacts that running fare-free have had over the Merrimack Valley as a whole. The study was presented to the Advisory Board on February 6, 2025 and the Board voted unanimously to make free fares a permanent part of MeVa's service. A complete copy of this study and the comprehensive analysis performed and the meeting minutes from the board meeting are included in Appendix G.



NOTICE OF MEETING

A virtual (Zoom) meeting of the MeVa Transit Fixed Route Service Committee is scheduled for **Monday March 31, 2025 at 9:30 a.m.**

Records pertaining to this meeting are on file and can be obtained at the office of Merrimack Valley Transit, 85 Railroad Avenue, Haverhill, MA 01835.

This notice posted to MeVa website, www.mevatransit.com, on Monday March 24, 2025 at 12:00 noon.

To join the meeting, click the link below or paste it into your browser:

<https://us06web.zoom.us/j/84348419476>

Meeting ID: 843 4841 9476

One tap mobile: +13092053325,,84348419476# US

Dial: 309-205-3325 US

AGENDA

1. Introductions
2. Review of Updated MeVa Title 6 VI Plan
 - *Bonnie Mahoney, Chief Compliance Officer*
 - *Vote to approve and recommend to full MeVa Advisory Board required*
3. Review of planned 20-minute service starting in July for the #1 (Lawrence-Haverhill via the Loop) & #24 (Lowell-Lawrence) that will be paid for through MassDOT discretionary Connectivity grant
 - *Niorka Mendez, Deputy Administrator*
 - *Vote to recommend to full MeVa Advisory Board required*
4. New Business Unforeseen by the Chair
5. Adjournment