

NANTUCKET REGIONAL TRANSIT AUTHORITY

Comprehensive Title VI Plan

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Introduction

Use of Federal Funds Disclaimer

This Comprehensive Title VI Plan was funded via grant funds from the Federal Highway Administration (FHWA) of the United States Department of Transportation. The views and opinions of the authors or agency expressed herein do not necessarily state or reflect those of the United States Departments of Transportation (USDOT).

Annual Submission of Assurances

The NRTA will submit an annual Title VI Assurance as part of the annual Certification and Assurance submission to FTA (attachment 1). The NRTA will collect the Title VI assurances from any sub-recipients prior to passing through FTA funds.

Comprehensive Title VI Plan

The Nantucket Regional Transit Authority (NRTA) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of race, color, or national origin (including limited English proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both, also prohibit discrimination on the basis of age, sex, and disability. These protected categories are contemplated within the NRTA's Title VI Programs consistent with federal interpretation and administration. Additionally, the NRTA 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.

The NRTA 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. Likewise, the NRTA 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.

Each year, the Federal Government requires recipients of federal aid to create a Title VI report to provide evidence of Title VI compliance. Rather than provide a targeted report on a particular compliance area or areas (similar to recent previous cycles), this fiscal year the Federal Government has required Massachusetts Regional Planning Agencies (RPAs) to create comprehensive Title VI Plans.

Part 1 of this planning document provides a community profile that spatially depicts populations of interest to assist with equitable planning. **Part 2** of this planning document provides basic information and resources on reporting, complaint forms, records and procedures, the region's public participation plan (PPP), Language Assistance Plan, and staff training.

Part 1 – Community Profile

Data Sources

The charts and data included in this Title VI Comprehensive Plan is sourced from the United States Census Bureau’s 2020 Decennial Census and American Community Survey 5-Year Samples, as not all granular Decennial Census data is available at the Block Group Level at this time.

Cluster Maps

Nantucket has larger Census Block Groups due to its relatively small population. When populations are mapped by Census Block Group geographies, it can be challenging to infer spatial patterns. To improve the macro-level depiction of where focus populations live while retaining anonymity at the level of individual records, staff constrained the display of block groups by the shape of built structures. Dots, representing one person or household, are randomly distributed to structures located within the appropriate Census Block Group, creating a more accurate depiction on clustering. The maps included in the document do not depict the exact point at which a particular focus population resides due to the random distribution of dots but improve the value of spatial display by illustrating potential clustering.

Equity, Labor, and Seasonal Variation

Dependence on data products developed by the United States Census Bureau is common across regional and local planning agencies. These credible data products result from robust sampling, review, and quality control undertaken by the Census Bureau. While reliable and generally accepted, these data alone cannot fully depict equity concerns and needs. Nantucket houses a transient, seasonal labor force whose races, incomes, and needs are not documented by the Census. In some cases, these seasonal employees are from the United States, but in other cases, these employees call other nations “home.” Additionally, Nantucket sources a substantial labor population from the mainland, whose places of employment have mainland addresses but require on-island work. To date, there is no data source to document quantity, races, incomes, languages, and needs of these known populations. Future sampling efforts undertaken by the town or region could attempt to devise a way to better document these populations and their needs.



Image 1 - Greenhound bus station

Population by Race – Persons & Percentages

Nantucket is a diverse community. As shown in Figure 1, 29% of the island’s year-round population report nonwhite or mixed race status. The Census category “Some Other Race” accounts for 9% of the year-round population, with Mixed-Race and Black or African American persons accounting for another 9% and 7% of the total population, respectively. Map 1 depicts the spatial distribution of white (71%, salmon) and nonwhite (29%, blue) persons reporting permanent residence on Nantucket. While there is spatial dispersion of nonwhite persons, clustering is visible around the Mid-Island and South of Town neighborhoods, with some additional clustering in the newer developments north of the airport.

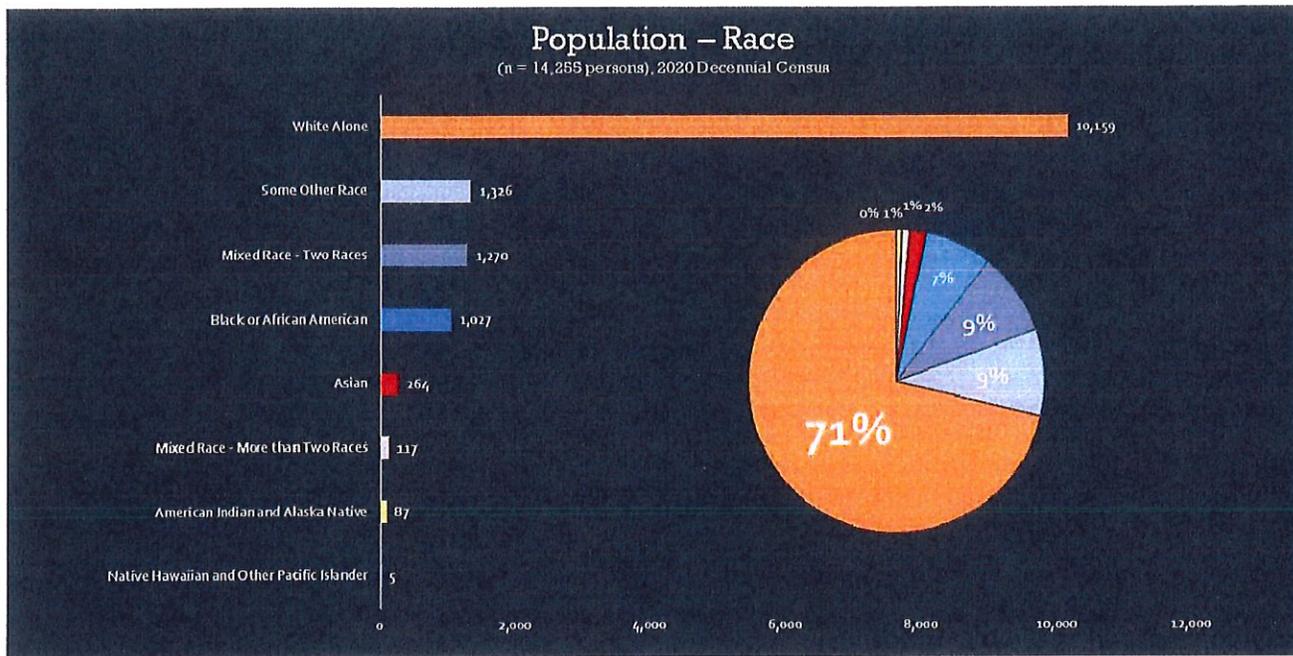
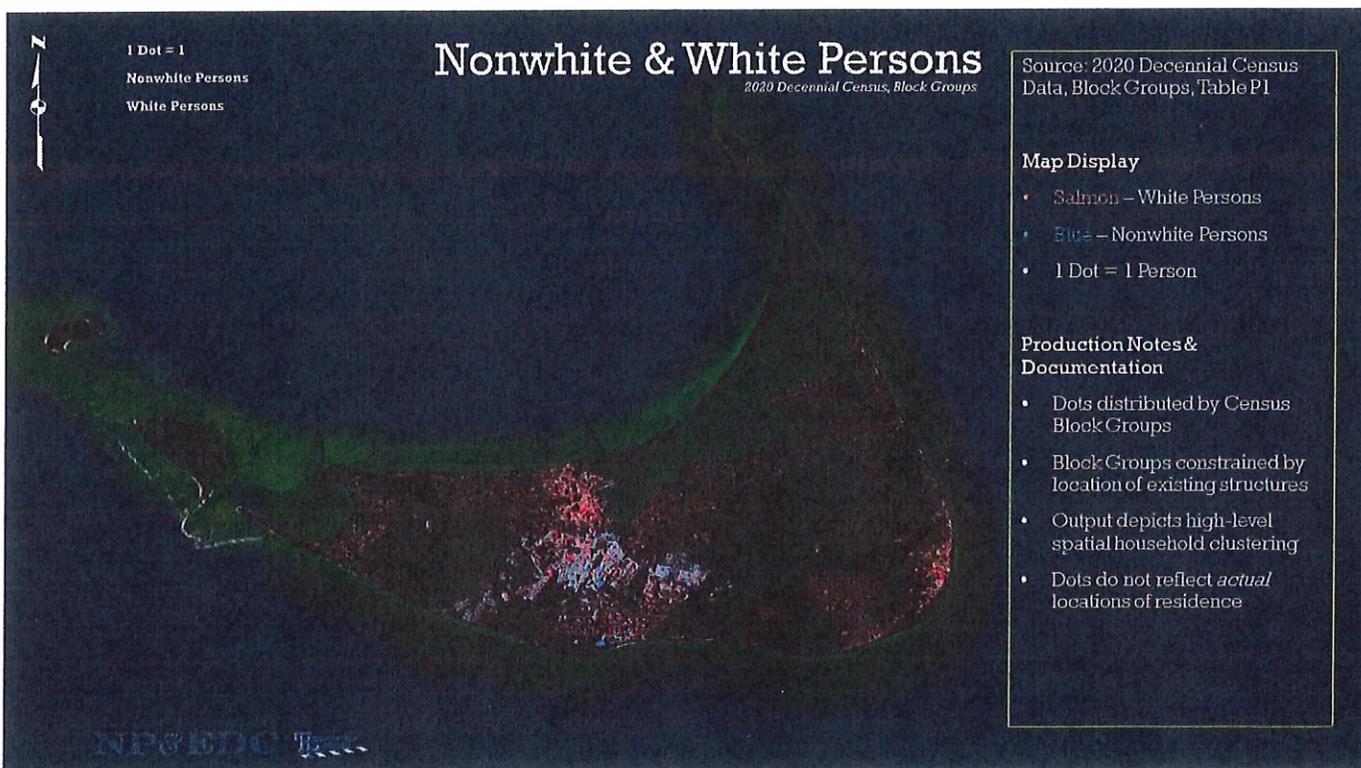


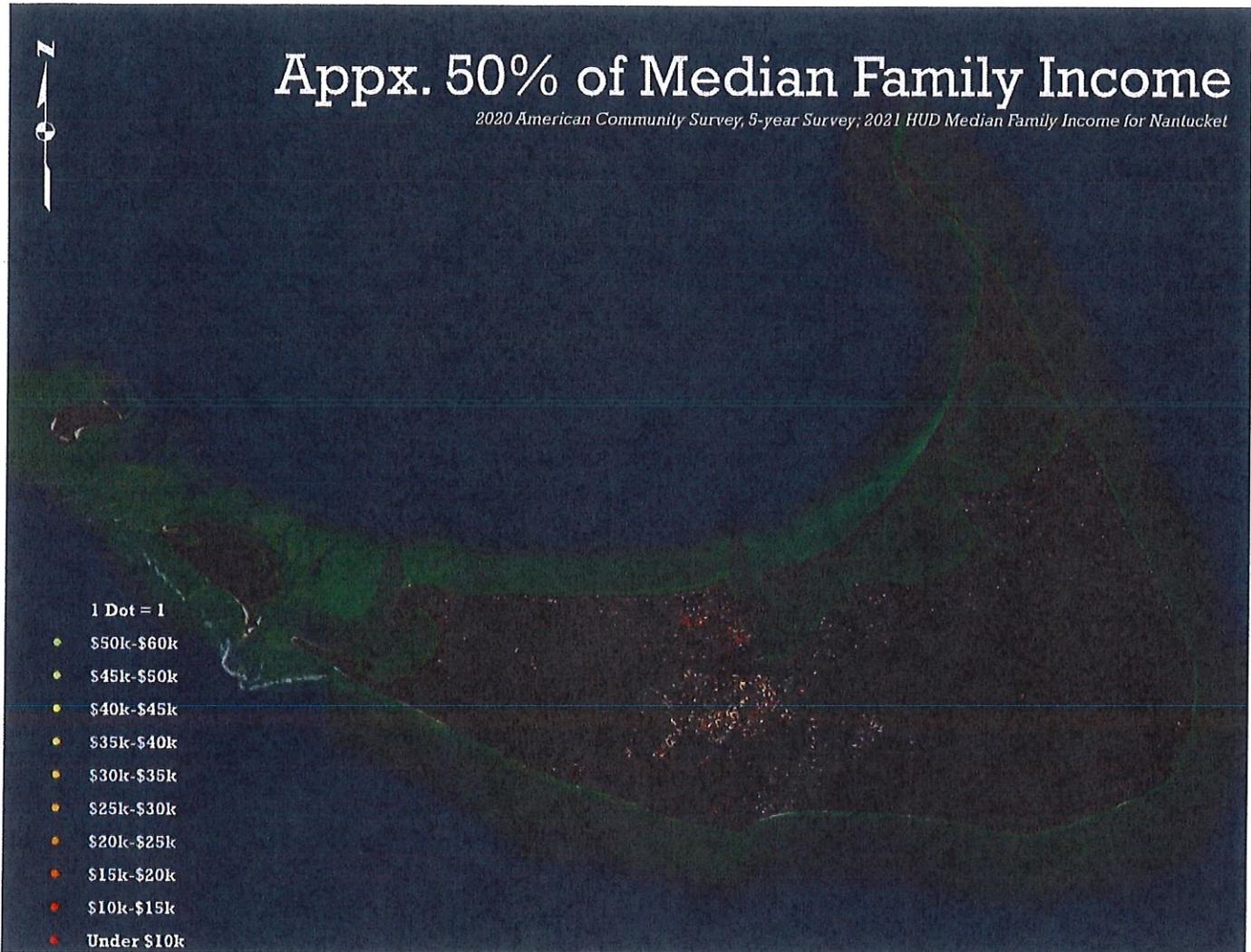
Figure 1 - Population by Race



Map 1 - Nonwhite and White Population

Household Income

As shown in Figure 2, across the 3,709 households included in the American Community Survey (ACS) 5-year sample data the majority of households report earn \$200,000 or more per year. The United States Department of Housing and Urban Development (HUD) set the Fiscal Year 2021 Family median Income for Nantucket at \$122,800. This number is used by the local housing authority to determine different eligibility thresholds for its programs. 50 percent of Family Median Income for FY21 is \$61,400. Based on this and Census reporting brackets, Map 2 depicts the spatial dispersion of households earning \$60,000 or less. These households are concentrated in the mid-island and areas south of the downtown area.



Map 2 - Median Income

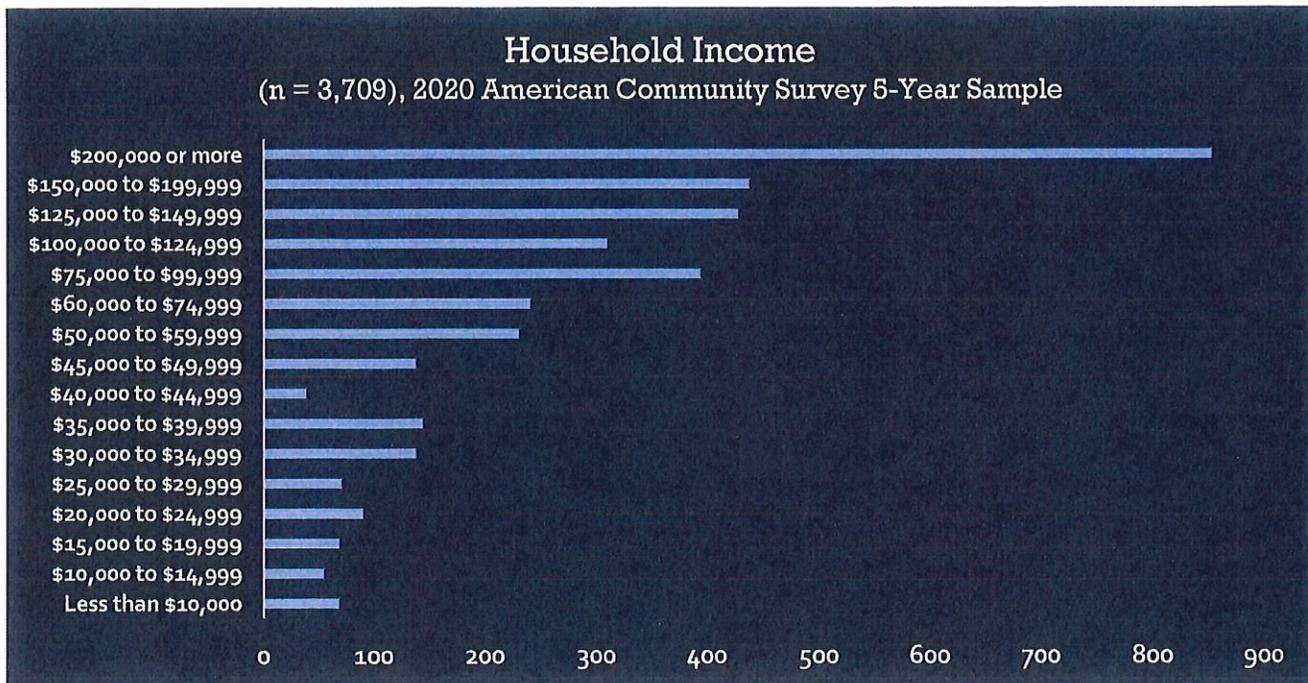
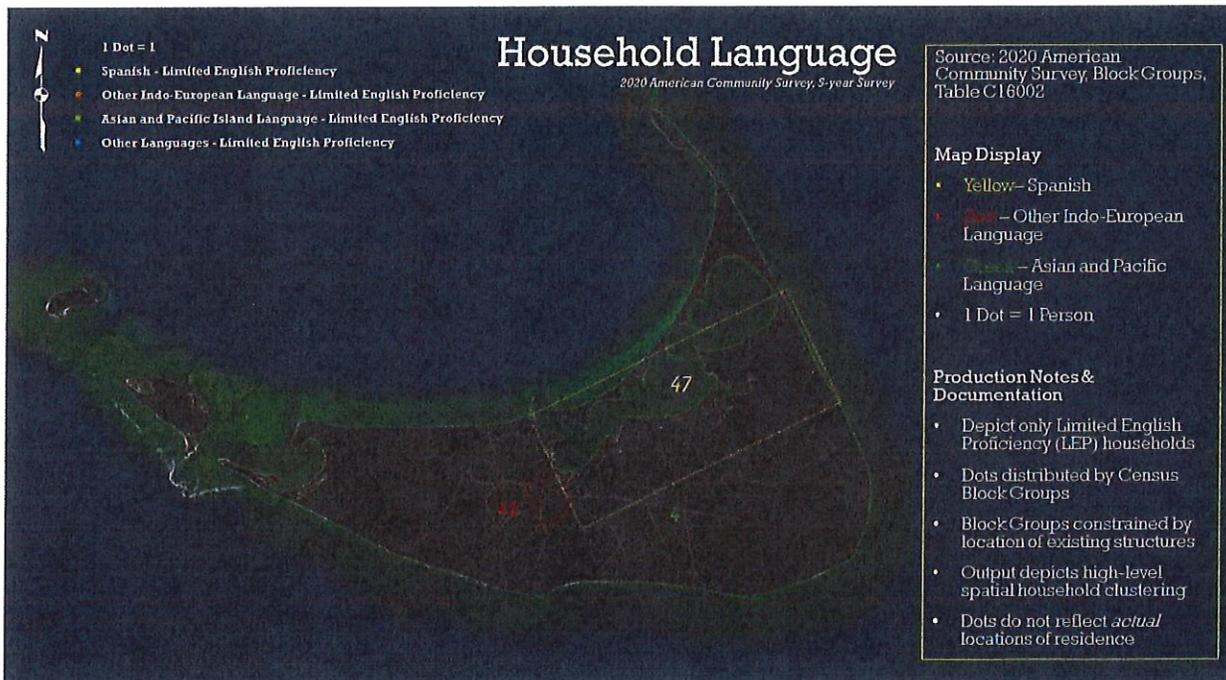


Figure 2 - Household Income

Language

Map 3 below shows the special distribution of Limited English Proficiency (LEP) by language spoken at home using the ACS 5-year data set. There are a sufficient number of Spanish and Other Indo-European Language LEP households in the mid-island and Polpis Road neighborhoods that warrant outreach accommodation efforts. As determined by the Town's Communications staff, the Portuguese language represents the Indo-European Language, and translation of outreach materials and online content prioritizes Spanish and Portuguese translation.



Map 3 - Limited English Proficiency

Regional Environmental Justice Plus (REJ+) Communities

Over the past year, the Massachusetts Department of Transportation (MassDOT) has been working to spatially map Regional Environmental Justice Plus Communities (REJ+). While remaining under development, the geographic designation is intended to depict areas that are most impacted by transportation change. REJ+ communities are mapped at the Block Group level. The following criteria determine whether a Block Group receives an REJ+ designation:

At least one of the following three EJ criteria must be true:

- Annual median household income \leq MPO 25th percentile
- Percent of minorities \geq MPO 75th percentile
- Percent of Households with Limited English Proficiency (LEP) \geq MPO 75th percentile

At least one of the following three transportation criteria must be true:

- Percent of households with zero vehicles \geq MPO 75th percentile
- Percent of households with disabilities \geq MPO 75th percentile
- Percent of seniors (65+ years) \geq MPO 75th percentile

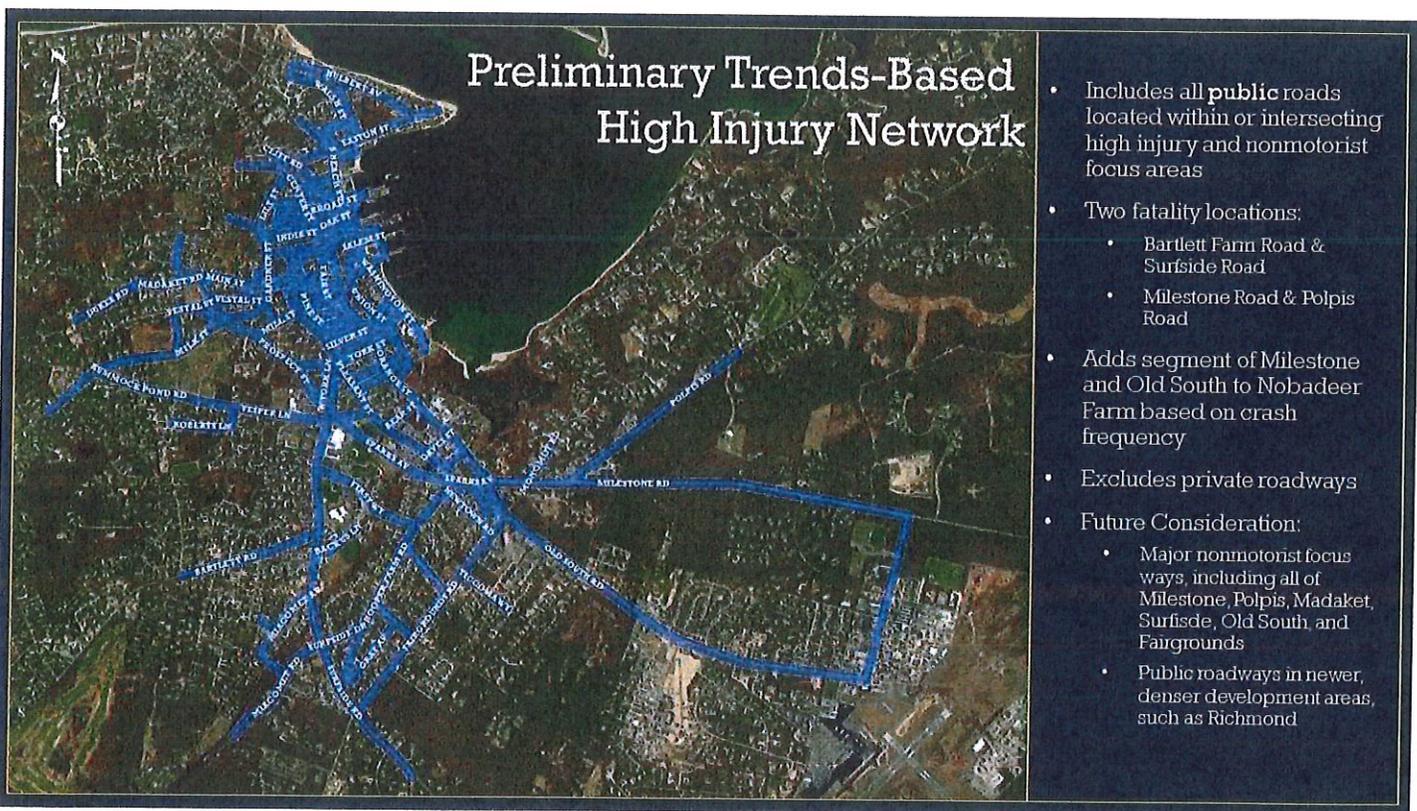
Region	Income	Minority	LEP	Disability	Zero-Vehicle	Senior	The criteria are relative to the region rather than State or nation to account for local costs and contexts. As of this writing, MassDOT has developed regional thresholds for REJ+ designation as shown in the adjacent table. Once finalized, the Nantucket TPO will integrate the REJ+ communities into its decision-making framework for investment decisions.
Berkshire	\$ 49,835	17%	0%	36%	10%	31%	
Boston Region	\$ 72,237	47%	7%	28%	17%	21%	
Cape Cod	\$ 62,444	15%	1%	30%	6%	42%	
Central Massachusetts	\$ 53,780	41%	7%	33%	13%	21%	
Franklin	\$ 51,655	14%	1%	38%	9%	27%	
Martha's Vineyard	\$ 61,957	22%	0%	22%	5%	35%	
Merrimack Valley	\$ 58,737	67%	8%	32%	10%	21%	
Montachusett	\$ 53,686	31%	2%	32%	8%	21%	
Nantucket	\$ 80,312	26%	1%	32%	9%	33%	
Northern Middlesex	\$ 70,603	46%	5%	31%	8%	19%	
Old Colony	\$ 70,178	51%	4%	31%	6%	22%	
Pioneer Valley	\$ 43,895	59%	7%	37%	17%	24%	
Southeast Massachusetts	\$ 49,891	28%	8%	36%	13%	23%	

Figure 3 - Regional Environmental Justice Population

Addressing the Mobility Needs of Minority Populations

The Town of Nantucket has adopted a Complete Street Policy. The Town recognizes that users of various modes of transportation are legitimate users of the transportation system and deserve safe facilities. "All users" includes users of all ages, abilities, and income levels. And further, all projects, including new construction, maintenance and reconstruction, are potential opportunities to accommodate all users.

The spatial analyses developed suggest that primary areas of focus fall just east and south of town, as well as in the Mid-Island area and areas north of the airport. Being denser, these areas are also prioritized for investment for safety purposes. The roadways shown in the Map 4 are intended to demonstrate where investment should be prioritized based on 20-year records of crashes resulting in injury and crashes involving active transportation. These roadways were selected based on a statistical spatial analysis, which found crash frequencies for these categories of crashes were less likely to be random and more likely to be associated with an underlying pattern. In this case, the underlying pattern found in the analysis is likely attributable to roadway volumes and resident and visitor population density. These roadways additionally align well with the Town Overlay District, which is shown in the map depicting previous project distribution.



Map 4 - Preliminary High Injury Network

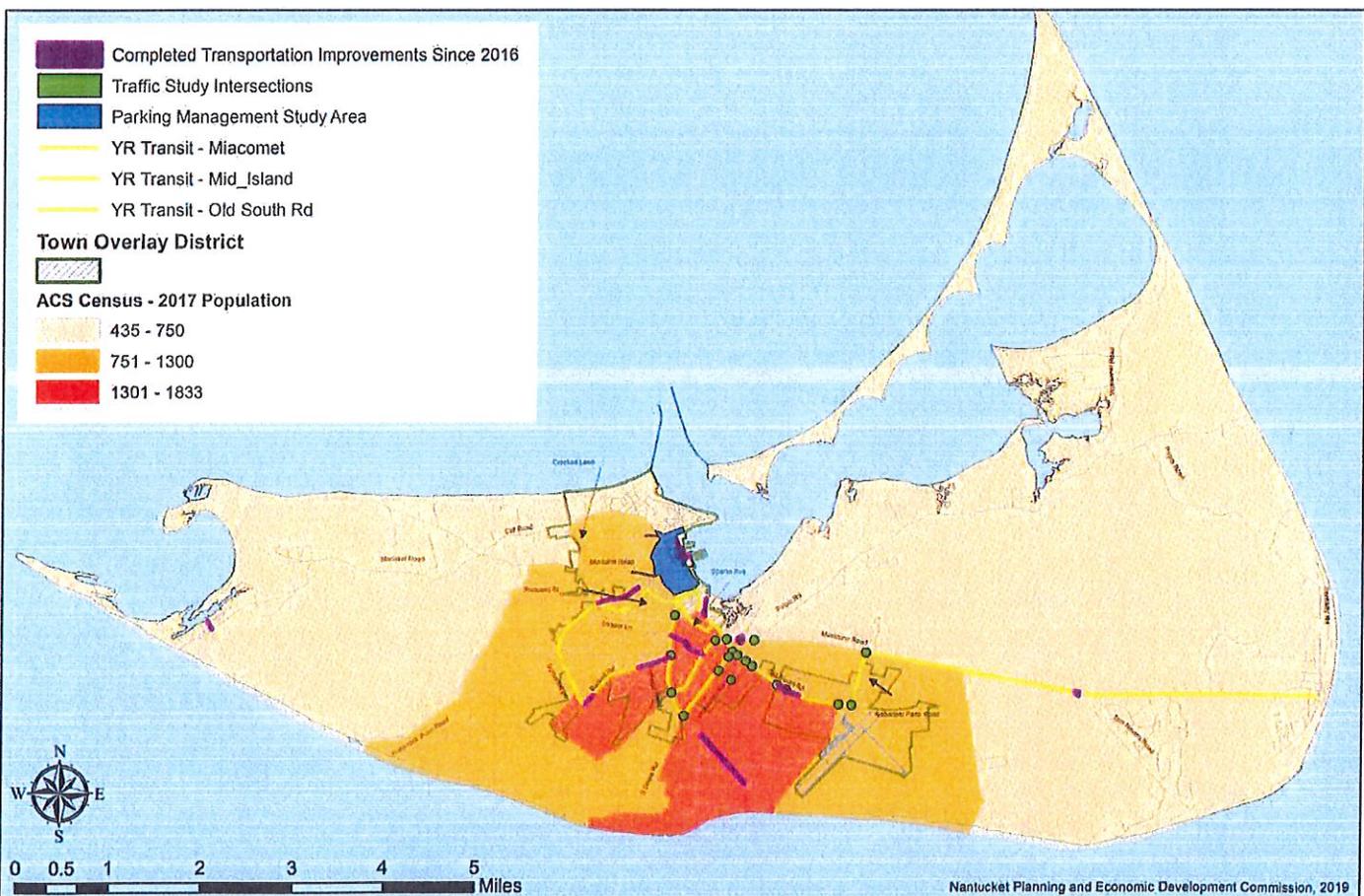
Vehicle ownership on Nantucket is expensive when accounting for portage costs and fuel costs. MassDOT's REJ+ data suggests that at least one Census Block Group has rates of Zero-Vehicle Ownership above 9%, which is 75th percentile threshold for the region. As the REJ+ data develops further, staff will monitor spatial needs for transit and active transportation improvements.

Demographic Maps and Charts of Funding Distribution & Analysis of Previous Investments

Nantucket has made exemplary strides over the last few decades to advance supportive transportation networks. These include the introduction of the Nantucket Regional Transit Authority in 1995, and the initiation of year-round NRTA operations on select routes in 2018. The Your-Island-Ride reservation-based shuttle service began in 2001 and provides rides free of charge for people with disabilities and people over 60 years of age.

The town and region have implemented numerous paths for pedestrians, cyclists, and other rollers, and continues to design new active transportation paths for residents and visitors. No new projects have advanced since 2018; however, several are in development including the Mill Hill Connector (lead by the Land Bank), the Wauwinet Sidepath, the Tom Nevers Sidepath, and the sidewalk improvements in the Mid-Island vicinity.

Map 5 depicts the location of previous projects and year-round transit routes. Investments have been focused within the Town Overlay District. Investment is prioritized in this area per the Nantucket Master Plan. These portions of the island are more densely settled with commercial uses, housing, and utility infrastructure, and also align with clusters of larger need. As shown using 2020 American Community Survey Block Group data, the Town Overlay District encompasses a concentration of households at and below median family income. Future path project investments—Wauwinet and Tom Nevers, extend beyond the Town overlay district. These project help connect areas within the Town overlay district, including equity focus areas south of Town, Mid-Island, and east of Town, with conservation and recreation opportunities elsewhere on the island. These projects also support mobility for individuals without access to a vehicle.



Map 5 - Completed Transportation Improvements since 2016

Part 2 – Title VI Complaint Procedures

Purpose and Applicability

The purpose of this document is to establish procedures for the processing and disposition of both discrimination complaints filed directly with the Nantucket Regional Transit Authority (NRTA), and discrimination complaints that the NRTA has the delegated authority to process under Title VI of the Civil Rights Act of 1964 (Title VI) and related state and federal nondiscrimination authorities, including the Americans with Disabilities Act (ADA).

The procedures describe an administrative process aimed at identifying and eliminating discrimination in federally funded programs and activities. The procedures do not provide an avenue for relief for complainants seeking individual remedies, including punitive damages or compensatory remuneration; they do not prohibit complainants from filing complaints with other state or federal agencies; nor do they deny complainants the right to seek private counsel to address acts of alleged discrimination.

The procedures described in this document apply to the NRTA and their subrecipients, contractors, and subcontractors in their administration of federally funded programs and activities. As part of their efforts to comply with Title VI, subrecipients of federal financial assistance through the NRTA are encouraged to adopt these complaint procedures. In so doing, these subrecipients acknowledge their obligation to afford members of the public with an opportunity to file complaints alleging violations of nondiscrimination policies in place across their organization and in their programs, services, and activities. In accordance with federal guidance, subrecipients of transit-related funds understand they have the authority to process Title VI complaints and will inform their recipients, the NRTA, of complaints received and the outcome of investigations as the matters are resolved.

Subrecipients of highway-related funds further understand they do not have the authority to investigate Title VI violation claims filed against their organization (where their organization is the respondent or party alleged to have violated Title VI). All such claims will be forwarded to the NRTA Title VI Coordinator to determine the appropriate investigative authority. Highway-funding subrecipients retain the right to consider Title VI violation allegations as a matter of Assurance and/or internal policy compliance but are precluded from making determinations as to possible violations of Title VI. The NRTA encourages all subrecipients to communicate with the Title VI Coordinator when/if Title VI complaints are received to ensure proper handling.

Definitions

Complainant – A person who files a complaint with the NRTA.

Complaint – Written, verbal or electronic statement concerning an allegation of discrimination that contains a request for the receiving office to take action. Where a complaint is filed by a person with a disability, the term complaint encompasses alternative formats to accommodate the complainant's disability.

Discrimination – That act or inaction, whether intentional or unintentional, through which a person in the United States, solely because of race, color, national origin, or bases covered by other nondiscrimination authorities, such as gender, age, or disability, has been subjected to unequal treatment or disparate impact under any program or activity receiving federal assistance.

Operating Administrations – Agencies of the U.S. Department of Transportation, including the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Federal Rail Administration (FRA), the National Highway Traffic Safety Administration (NHTSA), and the Federal Motor Carrier Safety Administration (FMSCA), that fund transportation programs or activities.

Respondent – The person, agency, institution, or organization alleged to have engaged in discrimination.

Filing of Complaints

This section details the NRTA's procedures for processing Title VI discrimination complaints (on the basis of race, color, or national origin, including language) and complaints alleging discrimination on the basis of additional federal nondiscrimination provisions (on the basis of age, sex, and disability). Federal law and regulations governing Title VI of the Civil Rights Act of 1964 (Title VI) places the overall coordination authority for the investigation of civil rights complaints in the United States Department of Justice, which works collaboratively with federal agencies that carry out this responsibility. In the transportation sector, this investigative authority rests with the US Department of Transportation (US DOT) and its agencies for the different modes of transportation, including the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). In coordination with USDOT requirements, FHWA and FTA have established regulations and guidance that require recipients and subrecipients of federal financial assistance to establish procedures for processing Title VI complaints filed with these organizations. The procedures described below, modeled on recommended complaint procedures promulgated by the US Department of Justice (US DOJ), are designed to provide a fair opportunity to have complaints addressed that respect due process for both complainants and respondents. In addition to the formal complaint resolution process detailed herein, the NRTA shall take affirmative steps to pursue informal resolution of all Title VI complaints, when possible.

The Complaint Process

The NRTA is committed to ensuring that no person is excluded from participation in, or denied benefits of its services on the basis of race, color, and national origin as protected by Title VI of the Civil Rights Act of 1964, 49 CFR 21.9(b). Anyone who believes there is an act of discrimination in a program or activity may file a complaint with the Nantucket Regional Transit Authority, the Massachusetts Department of Transportation and the FTA Office of Civil Rights.

Complaints should be addressed to: Gary Roberts, NRTA Administrator, Nantucket Regional Transit Authority, 20 R South Water Street, Nantucket, MA 02554, 508-325-9571; TTY 508-325-7516; groberts@nantucket-ma.gov. Massachusetts Department of Transportation, Office of Civil Rights, 10 Park Plaza, Suite 4160, Boston MA 02116 or MassDOT.civilrights@state.ma.us

Any person may submit a complaint in writing or verbally who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the NP&EDC or NRTA in their role of planning and programming federal funds. Complaints may be submitted for discrimination on the basis of race, color, and national origin. Any such complaint shall be submitted no later than 180 days after the date the person believes the discrimination to have occurred.

Complaints shall be in writing, verbally and if necessary with assistance provided by NRTA and shall set forth as completely as possible the relevant facts and circumstances surrounding the alleged discrimination. The following information shall be included:

- Name, address, and phone number of the complainant
- A statement of the complainant, including:
 - The basis of the alleged discrimination (race, color, national origin)
 - A detailed description of the alleged discriminatory act(s)
 - What in the nature of the alleged act(s) led the complainant to feel that discrimination was involved
 - The date(s) on which the alleged discriminatory act(s) occurred
 - The name(s) of individual(s) alleged to have participated in the act(s)
- The names of all other agencies or organizations where the complaint is also being filed (if applicable)

- The signature of tile complainant and date submitted.

Upon receipt of the complaint, the NRTA staff will review it. Staff shall provide written acknowledgment of receipt to the complainant within ten (10) business days.

The review may include the gathering of additional information from the complainant and/or the alleged discriminating party or parties.

Upon completion of the review, staff shall submit a report of findings to the members of the NRTA Advisory Board. If the complaint is found to have merit, the report of staff shall also include proposed resolutions and/or recommended actions, such as:

- Forwarding the complaint to a responsible implementing agency
- Identifying remedial actions that are available to offer redress
- Identifying possible improvements to the NRTA Title VI processes.

If more time is required for the review, NRTA staff shall notify the complainant and NRTA Advisory Board chair of the anticipated additional time needed.

The NRTA staff shall submit the report of findings to the members of the NRTA Advisory Board for discussion and action. A copy of the report shall also to be provided to the complainant. The NRTA shall issue a written response to the complainant describing any action taken. The response shall be issued no later than sixty (60) calendar days after the date on which the complaint was received. If more time is required for action, the NRTA shall notify the complainant of the anticipated additional time needed.

The complainant can request a reconsideration of the case in instances where he or she is dissatisfied with the resolution. The request for reconsideration should be made within seven (7) calendar days of the original determination to the Administrator of the NRTA. The Administrator shall consider the complainant's request for reconsideration. The request for reconsideration shall be considered denied if no action is taken within the (10) calendar days after the date the Administrator received the request for reconsideration.

The right of a person to a prompt and equitable resolution of the complaint filed hereunder shall not be impeded by the persons pursuit of other remedies such as filing a complaint with the responsible federal or state department or agency. Use of this complaint procedure is not a prerequisite to the pursuit of other remedies.

These rules shall be construed to protect the substantive rights of interested persons to meet appropriate due process standards and to assure that the Nantucket Regional Transit Authority complies with the Title VI and implementing regulations.

If the complainant is dissatisfied with the resolution made by the Nantucket Regional Transit Authority, the same complaint may then be submitted to FTA or the Secretary of Transportation. A complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation for investigation.

Complaint Forms by Language

Complaints can be filed directly with the NRTA or to MassDOT or USDOT as NRTA is a subrecipient of federal funds. MassDOT has prepared the complaint form, which is translated into several languages. These forms are available on the [Title VI Plan website](#) can be mailed or emailed to the NRTA at:

Gary Roberts, NRTA Administrator, Nantucket Regional Transit Authority, 20 R South Water Street, Nantucket, MA 02554
groberts@nantucket-ma.gov

Complaint Log

Each year, the NRTA is required to include a log of any Title VI complaints filed within the last fiscal year. At the time of this writing and to the best of our knowledge, no Title VI complaints have been filed against the NRTA or its staff. As such, no log is included in this Comprehensive Title VI Plan.

Language Assistance Plan & Four-Factor Analysis

Neither the Town of Nantucket nor the NRTA have adopted a formal language assistance plan or policy. Based on American Community Survey (ACS) data depicted in the community profile, the Nantucket region, at 1.67%, has a relatively small population of Limited English Speakers (LEP). The recommended safe harbor threshold for providing translation services is 5% or 1,000 people in the community that speak English less than very well. Staff does attempt to reach out to populations by posting flyers and other notification materials in English, Spanish, and Portuguese at churches, markets, and other areas with high concentration of minority, LEP, low income, disabled, or elderly populations. The NRTA's public outreach website is also available in English, Spanish, and Portuguese.

The NRTA and the Town does make every effort possible to offer accommodations for anyone who is deaf or hard of hearing and would like to attend public meetings. Recorded meetings are made available on the Town's YouTube channel and have closed caption available. Upon request, a remote Communication Access Realtime Translation (CART), or a remote American Sign Language (ASL) Interpreter for anyone who is deaf or hard of hearing, can be reserved.

The NRTA will attempt to translate any document using available online services, contracting with a vendor, using the in-house Public Outreach Coordinator, or by contacting other public agencies, such as the local Police and Nantucket Community Hospital, for assistance with oral translation. The NRTA will also rely on the bilingual network setup by the Town of Nantucket's Public Outreach Coordinator and the Nantucket Regional Transit Authority (NRTA). The NRTA did not receive any request for translation of any documents in FY22 and did not expend any funds for language or disability related accommodations; however, the NRTA is prepared and equipped to provide these services should they be requested.

As part of the NRTA's public outreach, planning staff notifies a variety of stakeholders representing outside agencies and population groups, such as the Interfaith Council, Commission on Human Services, NRTA Advisory Board, and Housing Authority. Such notification is part of the development of all program documents and studies. Each of these agencies and committees are consulted with to solicit issues and concerns, even on an anecdotal level, for all population groups. Planning staff will continue this effort to ensure input on transportation needs for Title VI and EJ populations who may not participate in open public meetings.

Four Factor Analysis Summary:

- Proportion: The proportion of LEP persons served by the NRTA is estimated to be 1.67% of the population total.
- Frequency of Interaction: While the frequency of interaction to date has been limited, staff will continue to make their best reasonable efforts to provide translation, upon request, and where appropriate, in advertisement and public notice.
- The Nature of the Program: The NRTA is responsible for transportation planning, which can benefit LEP populations as well as the broader population. The NRTA is responsible for transit-related services.
- Costs associated with Service: Reasonable accommodation will be made for professional translation upon request. For other occasions, free and/or network based translation services (as described above) will continue to be employed by the NRTA.

Subrecipient Monitoring Process

To date, the NRTA does not and has not passed federal aid through to additional subrecipients. As such, no additional monitoring processes are required; however, should the occasion arise in which the NRTA would identify a subrecipient of federal aid, a Title VI monitoring provision would be developed.

Data Collection/Reporting/Analysis

In the past calendar year, NRTA participated in coordination at Massachusetts' Transportation Manager's Group prior to preparing this plan, in which MassDOT provided various updates and supporting documents. Staff compiled Census and American Community Survey data to identify and map the demographic profile of the regional population, including income and language profiles (see Section 1).

In addition to the collection of data and mapping, staff consulted a variety of stakeholder groups with connections with Title VI and EJ population during the development of all planning documents and studies, including Nantucket's Interfaith Council, Commission on Disability, Council on Aging, Council for Human Services, Nantucket Housing Authority, and Nantucket Housing Office.

Title VI Training

NRTA staff has been trained to use MassDOT's Regional Environmental Justice Plus (REJ+) Communities tool to expand staff understanding spatial distribution of vulnerable populations. An REJ+ community is a census block that has at least one of the following characteristics: 1) median income is less than or equal to the 25th percentile income of the region; 2) percent of minorities is greater than or equal to the 75th percentile of the region; or 3) percent of households with limited English proficiency (LEP) is greater than or equal to the 75th percentile of the region. Additionally, at least one of the following three transportation criteria must be true: 1) the percent of households with zero vehicles is greater than or equal to the 75th percentile of the region; 2) percent of households with disabilities is greater than or equal to the 75th percentile of the region; or 3) percent of individuals aged 65 or older \geq MPO 75th percentile.

Dissemination of Title VI Information

Notifying Beneficiaries of Their Rights under Title VI

The Nantucket Regional Transit Authority HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that no person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

The Nantucket Regional Transit Authority will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9(b).

The Nantucket Regional Transit Authority will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin, as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation. In 2013, the Rights of Beneficiaries Notice was posted on all NRTA revenue vehicles, at its Administrative Office, its information center and on its website. For the 2014 season, the Rights of Beneficiaries Notice, in Spanish, will be posted at these same locations. The following documents are available in Spanish on the NRTA's website: Title VI Overview, Title VI Rights of Beneficiaries, Title VI Non-Discrimination Policy, Title VI Discrimination Complaint Procedure, and the Title VI Discrimination Complaint Procedure (which can be filed electronically or printed out). These documents are also available on the website in English and using the translation section of the website can be translated into many different languages.

The NRTA will annually review its Notice to Beneficiaries and modify the document as needed. The dissemination strategy developed above will be followed for modified documents. The NRTA will annually review its dissemination strategy and modify if necessary.

Effective Practices for Fulfilling the Notification Requirement

Dissemination

Upon the approval of the NRTA's Title VI Program an announcement at its Advisory Board meeting which is televised. The NRTA will post the Program on its website and at the NRTA Administrative Office and have a copy available at the customer service center. The Program will also be made available to the public upon request. The public will be notified through a news notice to the local paper and on its website in the public notice section.

General Notification

Upon approval of our Title VI program, we will notify the public about our Title VI program through the measures described in the Dissemination portion of this document.

Document Translation

The NRTA will translate its Title VI Program upon request or if we are made aware, through updated data, or as a result of surveys, of other LEP populations in our service area.

Subrecipients

The NRTA will plan on all subrecipients adopting the Title VI Program of the NRTA.

Guidance on Conducting an Analysis of Construction Projects

The NRTA is not in the process of any construction projects at this time and does not have plans for construction projects well into the future. If that changes, the NRTA will work to ensure fair and equitable practices as they relate to FTA and the Title VI Program.

Guidance on Promoting Inclusive Public Participation

The NRTA conducts several public meetings on the subjects of fare structure changes, service changes and general information made available to the Advisory Board, including but not limited to season updates, budgets and other operational information as it relates to our services.

The NRTA promotes the public's participation as follows:

The NRTA coordinates with individuals, institutions and organizations in minority and low-income communities by providing outreach to our consumers in our service area.

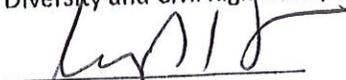
We receive feedback from our consumers by way of surveys from time to time and are always interested in what our consumers say about our services. There is a comment section on our website and feedback option on our real time bus phone app. Our drivers and customer service representatives are encouraged to document and provide feedback as to what can be done to improve our service based on the daily interaction they encounter with consumers.

The NRTA, from time to time, has meetings in which power point presentations are used to aide discussions. Consumers are permitted to audio record meetings if it is made known they are making use of a device. NRTA Advisory Board meetings are televised.

The NRTA Advisory Board meets at a location that is centrally located within the service area and is handicap accessible. The NRTA will use the local papers and media outlets, attend various meetings (Chamber of Commerce, Visitor Services, Rotary Club, Commission on Disability and Nantucket Healthy Community Collaborative) and other methods (as they

become available) to communicate with the public. The NRTA posts its Advisory Board meetings with the Town Clerk's Office and on its website. Agendas and Board packets are available on the NRTA's website prior to the meetings.

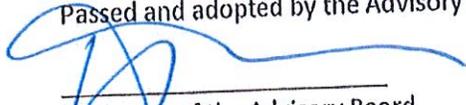
The NRTA will work with the LEP population to make sure that we implement DOT's policy guidance. We will continue to explore different opportunities to overcome barriers within public transportation and refer to the MassDOT Office for Diversity and Civil Rights and/or the FTA website for assistance.



Gary Roberts
NRTA Administrator

2/18/24
Date

Passed and adopted by the Advisory Board of the Nantucket Regional Transit Authority this 18th day of February 2026



Chairman of the Advisory Board

2/18/2026
Date

Please provide the following information in order for us to process your complaint. This form is available in alternate formats and multiple languages. Should you require these services or any other assistance in completing this form, please let us know.

Name: _____
Address: _____
Telephone Numbers: (Home) _____ (Work) _____ (Cell) _____
Email Address: _____

Please indicate the nature of the alleged discrimination:

Categories protected under *Title VI of the Civil Rights Act of 1964*:

Race Color National Origin (including limited English proficiency)

Additional categories protected under related Federal and/or State laws/orders:

Disability Age Sex Sexual Orientation Religion Ancestry

Gender Ethnicity Gender Identity Gender Expression Creed

Veteran's Status Background Low-Income

Who do you allege was the victim of discrimination?

You A Third Party Individual A Class of Persons

Name of individual and/or organization you allege is discriminating:

Do you consent to the investigator sharing your name and other personal information with other parties to this matter when doing so will assist in investigating and resolving your complaint?

Yes No

Please describe your complaint. You should include specific details such as names, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please include any other documentation that is relevant to this complaint. You may attach additional pages to explain your complaint.

Have you filed this complaint with any other agency (Federal, State, or Local)?

Yes No

If yes, please identify: _____

Have you filed a lawsuit regarding this complaint?

Yes No

If yes, please provide a copy of the complaint.

Signature: _____ Date: _____

Mail to: Title VI Coordinator, MassDOT Office of Diversity and Civil Rights, Suite 3800, 10 Park Plaza,
Boston, MA 02116

Gary Roberts, NRTA Administrator, Nantucket Regional Transit Authority, 20 R South Water Street,
Nantucket, MA 02554

Email to: MassDOT.CivilRights@state.ma.us

groberts@nantucket-ma.gov