Vermont Transportation Equity Framework
Draft Chapter 4 – Gap and Needs Analysis

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Gap and Needs Analysis

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LIST OF ABBREVIATIONS

ACS	American Community Survey
ADA	Americans with Disabilities Act
ASL	American Sign Language
BTS	Bureau of Transportation Statistics
CEJST	Climate and Economic Justice Screening Tool
CTEDD	Center for Transportation, Equity, Decisions, and Dollars
DEI	Diversity, Equity, and Inclusion
DHAE	Disproportionately High and Adverse Effects
DMV	Department of Motor Vehicles
DOE	Department of Energy
DOT	Department of Transportation
EJ	Environmental Justice
E.O.	Executive Order
EPA	Environmental Protection Agency
ESL	English as a Second Language
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GMT	Green Mountain Transit
GTFS	General Transit Feed Specification
LATCH	Local Area Transportation Characteristics for Households
LEHD	Longitudinal Employer-Household Dynamics
LEP	Limited English Proficiency
LODES	LEHD Origin-Destination Employment Statistics
LRTP	Long Range Transportation Plan
MOU	Memorandum of Understanding
MPO	Metropolitan Planning Organization
NASEM	National Academies of Sciences, Engineering, and Medicine
NHTS	National Household Travel Survey
NRPC	Northwest Regional Planning Commission
RFI	Request for Information
RPC	Regional planning commissions
RTP	Regional Transportation Plan
TCDG	The Creative Discourse Group
TIP	Transportation Improvement Program
UI	Unemployment Insurance
USC	University of Southern California
USDOT	US Department of Transportation
VAPDA	Vermont Association of Planning and Development Agencies
VPSP2	VTrans Project Selection and Prioritization Process
VTEDI	Vermont Environmental Disparity Index

4.0 TASK 4: GAP AND NEEDS ANALYSIS

This chapter synthesizes the findings from the previous chapters to identify key needs and gaps in how equity is applied in the activities of the Agency of Transportation and its RPC partners. Specifically, this chapter accounts for the following:

- National Best Practices
- Federal and State Regulations/Policies
- Federal, State, and Regional Processes/Data/Tools
- Direct Engagement
- Stakeholder Engagement
- RPC Engagement

The synthesis accounts for local, state, and national practices and compares that with the insights obtained from the Task 3 engagement activities (chapter 3). In some instances, there are gaps between the stated practice and the actual activities and actions. In other cases, there are ways to consider new input or consider emerging methods and approaches. These all lead to opportunities which will inform the recommendations.

4.1 TASK 4 FRAMEWORK

The following framework was used to review and organize the Task 2 and 3 materials in Task 4 to identify gaps and opportunities.

Pillars of Process Equity:
- Distributive: Accurate Population Representation
- Procedural: Equitable Access to Decision Making
- Contextual: Needs Analysis; Service Provision
- Corrective: Prioritization Process; Ongoing Performance Management

Task 4 Framework:
- Needs: What should happen, based on national best practice or requirements and values expressed in engagement
- Existing Offerings: What is happening in the operations of the Agency and its RPC partners

- Gaps: Where are there disconnects between needs and existing offerings, and where there are potential opportunities for growth

Framework Key:
- **Bold Text** = suggestions and opportunities
- *Italicized Text* = resources identified (e.g., documents, tools, data)

4.2 PILLAR 1: DISTRIBUTIVE EQUITY: ACCURATE POPULATION REPRESENTATION

Framing questions:
- How can we obtain an accurate representation of the population and identify communities of concern?
- How have the Partners and local jurisdictions described or understood who lives in the state/region? How do we recognize, communicate, and engage with individuals and communities?

Task 4 Component	Task 2 and 3 Findings

Needs: What Should Happen	- National Best Practices/Guidance:
	  - **To determine key populations, data from the following sources could be considered**: *American Community Survey* or *Public Use Microdata Samples (PUMS) from the US Census Bureau, US Department of Health and Human Services poverty guidelines, local adult literacy or ESL programs*, or stakeholder input (Task 2, Guidance and Successful Practices).
	  - **To determine the regional distribution and concentration of key populations and the transportation performance they experience, the following mapping/screening/modeling tools could be considered:** *GIS mapping, EPA's EJSCREEN, Climate and Economic Justice Screening Tool, travel surveys, regional travel demand modeling, or mapping,* and use of *General Transit Feed Specifications* to capture fixed-route transit access (Task 2, Guidance and Successful Practices and Task 5 Data and Tools).
	
	- Engagement Best Practices/Guidance:

Task 4 Component	Task 2 and 3 Findings
	o **Agency staff should attend community events and work on relationship building with key communities before seeking input**. Staff should have conversations with community members and leaders to learn which issues are most pertinent to a given community and learn which community members are most affected. More connection of staff to community and understanding of lived experiences is key. Staff should engage in dialogue explaining what VTrans goals are and see if there are opportunities to align agency goals with community goals. Agencies should connect with community organizations that have connections with and commitments to communities that are under resourced (Task 3, Direct). o Groups identified by stakeholders as equity focus groups include the following: Low-income communities, people with substance abuse issues, older adults, people with disabilities, rural residents, limited English speakers, people who identify as LGBTQ+, people who lack resources, people of color, people experiencing homelessness, people who were previously incarcerated, people without vehicles, people under federal protections (e.g., EJ communities), migrant and immigrant farmworkers, refugees or asylum seekers, and Abenaki Indigenous populations (Task 3, Stakeholder). o Use of *Equity Impact Worksheets* that internal VTrans managers are meant to utilize but currently don't (Task 3, Stakeholder).

Existing Offerings: What is Happening	• VTrans Current Practices:
	   o No definitive resource used, and no standardized methodology or process established. Resources that could be used include: *FHWA Title VI Program Implementation Plan* (Nov 2021), which provides resources and tools to identify protected populations and LEP populations, and *VTrans Public Involvement Guide*, which provides information about how and where to access population data (e.g., *American Community Survey, Community Action Agencies, ECOS Map Viewer*) (Task 2, VTrans).
	• RPC Current Practices:
	   o Rely on same materials as VTrans, including census data. CCRPC developed '*Equity Impact Worksheet*' as a supplement to their '*Public Participation Plan*' guidance. *CCRPC ECOS Map Viewer* and public website *Community Commons* help identify target populations. RPCs can also leverage proximity to and experience with regional community

Task 4 Component	Task 2 and 3 Findings

	groups to gain a sense of understanding which populations may be disadvantaged (Task 2, RPCs).
	○ NRPC has begun involving the state recognized Abenaki of the Missisquoi in planning efforts, a local community that has minimal recognition in national publicly available data sources. WRPC recently has involved local indigenous communities around Brattleboro to inform community priorities (Task 2, RPCs).
	• Current Engagement Practices:
	○ For the direct engagement efforts, four marginalized community groups in VT were selected using government databases, *VT Environmental Disparity Index*, and qualitative research by RDI & REJOICE (Task 3, Direct).
	○ Resources used to identify groups facing inequity include the following:
	  ▪ Tools: *EJ Screen, Climate and Economic Justice Screening Tool, FHWA HEP, VTrans Project Selection and Prioritization Process (VPSP2) program. Additional tools could include those being developed by ANR as part of Act 154.*
	  ▪ Agencies/Organizations: VT Civil Rights Office, Agency of Human Services, Department of Labor, Department of Health
	  ▪ Community Outreach: Collecting qualitative data by meeting with community members/leaders to discuss and better understand challenges for distinct population groups (e.g., past work conducted by REJOICE)
	  ▪ Policies/Plans: *Transit State Management Plan, Vermont Climate Action Plan, Congestion Mitigation and Air Quality Improvement (CMAQ) Program*
	  ▪ Services: Demand response/Dial-a-Ride services (Other/External Organizations) (Task 3, Stakeholder).

Gaps/Opportunities: Difference Between Needs and Existing Offerings; Potential Growth Opportunities	• Stakeholders reported a 'lack of data' and information on populations facing inequities that might enable agency staff to raise awareness about these populations. The 'lack of data' in this case could refer to data inaccessibility or lack of data granularity but is also likely a response to stakeholders feeling unable to find answers to questions being asked, or stakeholders expressing a desire for resource provision (e.g., providing fact sheets, postprocessed data, guidance) to make decisions. (Task 3, Stakeholder). **VTrans and RPCs should share information and documentation with each other about how to access and utilize publicly available datasets to answer questions about key population identification and population representation.**

Task 4 Component	Task 2 and 3 Findings
	Secondary, local datasets and qualitative resources should be used to supplement national or state-level data wherever possible and applicable, and shared between the agencies, as well. • Although both VTrans and RPCs rely on similar resources and materials to identify populations and determine accurate population representation, **a more standardized process and related training materials or resources could be developed that provides consistency in population identification and ensures up-to-date, reliable quantitative and qualitative information is used.** A key starting point for this would be the *FHWA Title VI Program Implementation Plan* (Nov 2021) and the *VTrans Public Involvement Guide* (2017). • While tools and resources exist on how to identify key population groups, ongoing relationship building is equally important to ensuring accurate population representation. **The Agency and RPCs should identify opportunities and responsibilities for ongoing engagement such as attending community events to learn more about key issues for community groups and to foster trust by building relationships with community members.** These activities should not only be part of a specific plan or project but be considered part of the essential infrastructure of agency activities (Task 2, VTrans, Task 3, Direct). To increase involvement of equity focus populations, improve access to community engagement events, and improve accuracy of population representation, RPCs could consider **implementing participant compensation** for meeting attendance. • **There is an opportunity for VTrans and the RPCs to work towards increasing involvement of local Indigenous Population groups in planning efforts due to the limited representation of Indigenous People in publicly available datasets**. Greater involvement with other identified equity focus groups that have limited representation in national datasets should be encouraged, as well. Research and communications held as part of the TEF work indicate a slow, steady relationship building process will result in the best outcome. The implementation of Act 154, Vermont's Environmental Justice law may present the platform for building a durable relationship between Indigenous populations of Vermont and state agencies.

4.3 PILLAR 2: PROCEDURAL EQUITY: EQUITABLE ACCESS TO DECISION MAKING

Framing questions:

- How can all voices be heard, participate, and engage in the planning process and create space for their involvement? Are those most burdened or affected by the plan part of the dialogue?
- How have the Agency and its Partners incorporated diverse, traditionally marginalized or underrepresented members of the public into the planning process?

Task 4 Component	Task 2 and 3 Findings
Needs: What Should Happen	- National Best Practices/Guidance: **Formulate a public engagement plan by identifying disadvantaged populations that may be affected by future projects and connect with these populations to encourage participation and better understand potential differential impacts.** Utilize tailored engagement strategies to communicate meaningfully, respectfully, and ensure community members can honestly express their needs and desires. Data from community participants should be collected to measure engagement plan efficacy throughout the project lifecycle. **Communicate decision making process clearly to all stakeholders to maintain transparency and accountability.** Sustain equitable participation through long lasting relationships and partnerships (Task 2, Guidance and Successful Practices). - Engagement Best Practices/Guidance: **Multichannel engagement:** Provision of in person and virtual community engagement events, small and large meeting size opportunities, multiple dates and varied times for events, targeted engagement to specific groups, and the provision of interpreters, translators, and childcare to provide ample opportunity for attendance and engagement (Task 3, Direct, Stakeholder). **Consider distributing outreach information through a variety of mediums** (e.g., flyers, emails, phone calls, door-knocking, text messages, phone alerts, local news outlets, various forms of social media, and direct mail); communicate in an accessible manner using community-appropriate language(s) (Task 3, Direct).

Task 4 Component	Task 2 and 3 Findings
	o **Consider having meetings hosted by a community member representative** to encourage honest and comfortable participation, especially in BIPOC communities and communities with limited English-speaking populations (Task 3, Direct).
	o Transportation agencies should **illustrate to communities how their input will meaningfully impact decisions**. This requires transparent and accessible public participation processes that allow for multiple opportunities for participation and for providing feedback throughout the project lifecycle. It also requires that the agencies take seriously the requirement for community input to impact decisions (Task 3, Direct).
	o **Agency staff should connect with local, community-based organizations, community leaders/liaisons, or housing managers/providers to tap into networks, gain local perspectives, and build trust in a community.** Staff could request guidance and suggestions for engagement/outreach efforts that are particularly effective for a given community. It is important for staff to compensate community organizations for their time and effort (Task 3, Direct). These efforts require designated responsibility and ongoing commitment of resources.
	o **Staff should take note of immediate issues present in a community that limit participation ability and facilitate connections to relevant agencies who can address these issues**. Connecting residents to direct service providers can foster trust and improve community engagement (Task 3, Direct).
	o Agencies should listen to and value feedback from community members that isn't delivered in a traditional or professional manner (whether that be because of the content, tone, or delivery), and should consider pointed input that may make agency staff uncomfortable. These types of input are valuable and should be recorded and tracked similar to other types of feedback (Task 3, Direct).
	o It is important for agency staff to provide educational/context materials to community members who are interested in learning more/having greater context on a given issue (Task 3, Direct).
	o Migrant workers should be made aware of available services. Outreach and listening to these populations would help gain input and valuable perspective (Task 3, RPCs).

Task 4 Component	Task 2 and 3 Findings

Existing Offerings: What is Happening	• VTrans Current Practices:
	   ○ No definitive resource used, and no standardized methodology or process established. Resources available include: *VTrans Public Involvement Guide and VTrans Project Definition Process Guidebook* (2017), which encourages early stakeholder participation in project planning and provides resources for methods of outreach to encourage participation by disadvantaged population; VTrans *VTransparency* website where current and future construction projects are listed along with contact information; and the *Transportation Planning Initiative (TPI)* which standardized the mechanism by which VTrans coordinates policy development and planning through the RPCs to make sure VT citizens and rural local officials are involved in the planning process (Task 2, VTrans).
	• RPC Current Practices:
	   ○ RPCs often have several boards and commissions appointed by member towns which offers the general public a greater degree of access to decision making compared to VTrans. All meetings are open to the public, but RPC boards have the final vote for policies and investment decisions. Effort put forth by RPC representatives to select accessible meeting times and locations varies. Some RPCs provide stipends for members of the public who participate in public engagement events, but as these stipends count as income, this can complicate participation due to income criteria required by certain assistance programs (Task 2, RPCs, Task 3, RPCs).
	   ○ Internet and remote access have enhanced public participation significantly and aided in making town meetings more accessible (e.g., amplified audio, visual, and translation capabilities) (Task 3, RPCs).
	   ○ Certain populations and community groups wish *not* to be engaged (e.g., the Mennonite community in Lamoille). RPCs must be respectful of this, and be thoughtful in communication efforts (e.g., sending letters vs. engagement in other forms), and considerate when reaching out to community leaders (Task 3, RPCs).
	• Current Engagement Successes:
	   ○ For the direct engagement efforts, community-specific engagement plans were developed for each community group via consultation with community leaders and liaisons. This included 1) participatory mapping, 2) community meetings, focus groups, and forums, 3)

Task 4 Component	Task 2 and 3 Findings
	photovoice challenge and ceremony, 4) neighborhood walks, 5) one-on-ones w/ community leaders, 6) facilitated dialogue, and 7) assisted public participation (Task 3, Direct). ○ 'Project Vision' takes place in City of Rutland. It involves staff from the police department doing neighborhood walks to gain feedback and input from community members. Invites are sent out to residents through the mail twice a month. Residents are receptive to the less-formal nature of this engagement (Task 3, RPCs). ○ In the Bennington neighborhoods of Willowbrook and Orchard Village, community meetings were held to address bus schedule issues; residents and school officials advocated for better schedules and changes were made to the schedule as a result (Task 3, Direct). ○ Communities with strong networks of service organizations and community groups were able to spread the word about community meetings more easily (Task 3, Direct). • Current Engagement Challenges: ○ RPCs are relied on heavily for local engagement, but RPCs don't feel supported by VTrans with local engagement and feel that VTrans will make design changes without considering community input or considering the methodology used to arrive at the proposed design. ○ RPCs have their own public participation plans but weren't sure who public engagement contacts were at VTrans. VTrans *Public Involvement Guide* is provided to public transit providers, but highway division staff aren't familiar with it or don't use it (Task 3, Stakeholder). ○ Most community organizations were not familiar with proactive strategies that VTrans adopts for equitable engagement (Task 3, Stakeholder). ○ In working with community organizations to expand involvement in the decision-making process, RPCs and municipalities have struggled recruiting new community members from disadvantaged population groups to participate in conversations and dialogue about decision making. This is particularly challenging in rural areas with smaller populations, fewer stakeholders, less access to programs and communication, and no obvious community 'champions' (Task 3, RPCs, Stakeholder). ○ When advocating for the equitable provision of transportation via the Task 3 engagement opportunities, many community members experienced hesitation and self-doubt that they

Task 4 Component	Task 2 and 3 Findings
	could meaningfully influence outcomes. Some community members were wary of community engagement efforts, and cited distrust in the government or of the impact of their involvement. It was also unclear to some community members how to give input, provide comments, or submit complaints about transportation challenges. This discouraged participation (Task 3, Direct). o RPC staff and community members identified a perceived lack of voice/standing from community members and questioned where the local voice mattered. Equity-focused work is often driven by people vocal about issues but may not include disadvantaged groups. In rural areas, this gap is exacerbated by a lack of internet access, lack of access to transportation information, and high cost of public transit (Task 3, Stakeholder, RPCs).
Gaps/Opportunities: Difference Between Needs and Existing Offerings; Potential Growth Opportunities	• VTrans lacks a standardized methodology for ensuring equitable access to decision making, and RPCs and community members have voiced concerns that VTrans may make decisions without considering community input. To ameliorate this, **VTrans should utilize a variety of resources such as *VTrans' Public Involvement Guide, VTrans' Project Definition Process Guidebook, Migrant Justice's constituent database*, and meetings with community groups and community organizations to better understand how projects will impact certain population groups, and to ensure all communities of concern are considered in the decision-making process.** The following tactics should be considered for implementation: o **Work with community organizations and liaisons to help facilitate discussions with specific communities of concern:** This can help bridge cultural and language gaps to ensure that communication is clear and effective. Community liaisons or champions can also help encourage participation from hesitant participants. o **Develop tailored engagement strategies** for specific communities of concern. This requires preplanning and resources. o **Provide communications materials and in multiple languages and formats** (e.g., letters sent to homes, flyers posted at frequented community locations, posted on community websites) o **Demonstrate the connection between engagement and decisions:** Providing opportunities for community discussions about how community input is integrated, how

Task 4 Component	Task 2 and 3 Findings
	project decisions are made, and why certain input or feedback was/wasn't incorporated into decisions. ○ **Leverage every point of engagement by connecting people to resources as needed:** Address immediate needs brought up by people in meetings even if they are not immediately connected to the project or plan being presented. Connect community members with relevant agencies who can address their issues. Consider bringing representatives of key service providers to public meetings. ○ **Provide engagement in multiple formats to reach more people:** VTrans and RPCs should provide ample opportunity for community engagement events in person and virtual, at different dates and times, and provide interpreters and translators to ensure all members of the audience can easily participate. ○ **Look beyond the public meeting:** to improve community participation and to foster stronger community relationships, community engagement and discussion opportunities can be conducted outside of large, in person meeting or "Zoom" (online breakout) rooms, and can take the form of neighborhood walks, participatory mapping, or on-one-on discussions with community leaders. ○ **Formally incorporate community members into the decision-making process through methods such as board or committee appointments:** Community members interested in contributing further to the decision making process can be included on VTrans or RPC committees with decision making abilities that affect local transportation (e.g., advisory or executive boards), or hired into positions at transportation agencies or community organizations with decision making roles. Agencies could consider using participatory budgeting to incorporate transparent community feedback opportunities with distinct outcomes, utilize regular community meeting events (e.g., town meetings) to vote on initiatives, or nontraditional methods such as digital or online voting to improve the feasibility and accessibility of voting. For community groups and organizations already engaged in the decision making process, (e.g., such as members of the Rutland organization, Disabled Access and Advocacy of the Rutland Area (DAARA)), agencies could consider the provision of technical support, funding, and compensation to support and encourage these efforts to improve local transportation (Task 3, Direct).

4.4 PILLAR 3: CONTEXTUAL EQUITY: NEEDS ANALYSIS

Framing questions:

- Are there inequities in the outcomes experienced by members of our society?
- Are projects being identified to address current inequities? What methods are used to identify these needs?

Task 4 Component	Task 2 and 3 Findings
Needs: What Should Happen	- National Best Practices/Guidance: **Needs assessment recommended at the state or regional level, with the goal for state/regional planning agencies to understand and prioritize most important concerns and identify high priority areas.** Needs assessment includes the following: - Collecting input from community members from disadvantaged groups about major issues and needs using surveys with demographic questions. - Evaluate environmental health and safety conditions for disadvantaged populations resulting from existing transportation system using the *EJSCREEN tool, walk/bike audits, regional emissions models, or crash data*. Future tools from Vermont's implementation of Act 154 may provide additional local Vermont context. - Determine access to essential services using *GIS mapping, GTFS feeds, travel demand modeling, census data, travel surveys, and transit rider surveys* to evaluate access. *US Census data* including *Longitudinal Employer-Household Dynamics (LEHD) and Local Area Transportation Characteristics for Households (LATCH) data* can be used to determine key population travel characteristics and patterns to additionally determine access.[i] - Report back and validate findings with community members and other stakeholders (Task 2, Guidance and Successful Practices). - Current transportation needs for underserved populations: - Well-lit and weather-resistant bus shelters are an existing and highly desired need for community members (Task 3, Direct).

Task 4 Component	Task 2 and 3 Findings
	- Contiguous, lit (related to comfort and safety), well-marked, and well-maintained sidewalks and bike lanes to provide safe and reliable accessibility for all residents, but especially for residents with disabilities (Direct, Stakeholder). - Transportation to meet daily needs. **Transportation connections to major cities/towns or greater remote job availability would enable access to larger job markets.** Broadband is becoming an essential mode to provide access to jobs and services. (Direct, Stakeholder, Task 3, RPCs). **Active modal (e.g., bicycle/pedestrian) infrastructure in and around vulnerable communities can provide safe and efficient means of travel besides cars, which is particularly important for residents without cars**, and should be valued and emphasized more heavily throughout the state (Task 3, RPCs). - The provision and maintenance of pedestrian infrastructure and affordable housing near essential services (Direct, Stakeholder). - The creation of bike lanes on high volume roads, or the extension and maintenance of high-volume road shoulders (Task 3, Direct). - Community members who lived near essential services saw walking as an easy and healthy transportation option (Task 3, Direct). - Additional guidance identified from Task 3 engagement: - Prioritization of the emotional health, satisfaction, and skills of bus drivers as critical components of promoting safe and reliable public transportation (Task 3, Direct). - Trailer Park management (or other relevant community management organizations) should work closely with state agencies and local jurisdictions to ensure roads are built responsibly (to deter flooding) and maintained (de-iced during the winter, re-paved when necessary) to improve road accessibility and reliability (Task 3, Direct). - Not a one-size fits all approach, but tailored solutions to each area for the populations that live in that area (Task 3, Stakeholder). **Additional support for smaller, rural communities with direct assistance, capacity building, technical assistance, and funding** (Task 3, RPCs). - Request consideration for more holistic thinking – considering safety, accessibility, mobility, equity, and affordability together (Task 3, Stakeholder).

Task 4 Component	Task 2 and 3 Findings
Existing Offerings: What is Happening	- VTrans Current Practices: - Current consideration of equity in identification of investment needs is limited. Needs assessments can occur through proactive planning efforts (informed by federal guidance) or from changes in the environment, safety, or community support (informed by community meetings, public input, or performance metrics). - RPC Current Practices: - RPCs identify and prioritize the majority of VTrans' investment needs which VTrans agrees with or vetoes. Needs typically result from day-to-day RPC activities as well as long term planning activities. Similar to VTrans, equity is not and has not been a driving force in the identification of needs, but some regional projects have goals that align with positive equity outcomes. - Current transportation challenges for underserved populations: - Challenges transporting middle and high school students due to lack of transportation opportunities. Children experience unsafe walking conditions to school (e.g., walking along highways, crossing non-signalized roads, walking in dark and inclement weather), experience stress, anxiety, and absenteeism from school as a result (Task 3, Direct). - Difficulties accessing physical and mental health care appointments quickly and reliably (Task 3, Direct). - Barriers in access to better job opportunities due to bus schedule limitations (Task 3, Direct). - Older residents often rely on a personal vehicle to access essential services, especially during inclement weather. Flooding, ice, and snow make access to vehicles, driving, or walking difficult, particularly on poorly maintained roads in rural areas (Task 3, Direct). - Multiuse bike/ped paths could be used to connect residential areas with employment centers but often don't have financial backing (Task 3, RPCs). - Personal vehicles can be inaccessible due to cost of owning and maintaining car, and older adults or adults with disabilities face additional accessibility challenges with personal cars (Task 3, Direct).

Task 4 Component	Task 2 and 3 Findings

	o Safety issues on the bus arise for riders with disabilities, who, if not properly situated, could be injured if drivers begin driving or stops suddenly (Task 3, Direct).
	    o Undocumented residents living by the border reported feeling trapped due to a lack of access to transportation options and a lack of access to amenities (Task 3, Stakeholder).
	    o Employment equity challenges are worsened by the shifting nature of the rural economy (e.g., a 12th generation farmer having to find work could be more difficult than an office worker in an urban area) (Task 3, RPCs).
	    o Community members largely felt that personal electric vehicles were unaffordable even with subsidies and felt that personal EVs were unreasonable and inequitable (Task 3, Direct).
	    o Trails through wooded areas and railroad tracks used to transport groceries on foot due to lack of pedestrian infrastructure (Task 3, Direct).

Gaps/Opportunities: Difference Between Needs and Existing Offerings; Potential Growth Opportunities	• **VTrans and RPCs should evaluate the inequities of current transportation system outcomes and highlight improvements that would improve outcomes for underserved populations.** For example, underserved populations have expressed needs for the expansion of existing bike, ped, and transit infrastructure to provide safe and reliable transportation to work, school, medical appointments, and the grocery store. These needs are greater for older adults and residents with disabilities, and are exacerbated by inclement weather, and poorly maintained and serviced roads. Owning a personal vehicle is inaccessible to many due to the cost, which puts added pressure and reliance onto transit and active transportation modes. As such, **VTrans and RPCs should prioritize the investment in transit and active transportation modes to provide solutions to these high priority needs, and work towards more equitable transportation outcomes for underserved populations.** • VTrans and RPCs currently do not foreground equity as a consideration in the identification of investment needs. **An opportunity exists for VTrans and RPCs to incorporate equity into the need identification process to ensure the results of the needs analysis better reflect the needs of all community groups. VTrans and RPCs should collect input from community members from disadvantaged groups to better understand high priority needs and areas.** Stakeholders can additionally utilize tools such as the *EJSCREEN tool* to evaluate health and

Task 4 Component	Task 2 and 3 Findings
	safety conditions from existing transportation systems, determine access to essential services using *GIS mapping*, and use *US census data* to determine key population travel characteristics. **Stakeholders should approach each community as a distinct entity, and not use a 'one size fits all' approach for determining needs. Lastly, stakeholders should report back the findings of the needs assessment to community members for validation and transparency.** • In rural areas, it can be difficult to identify needs for smaller, under resourced communities. **This presents an opportunity for RPCs to share with one another about best practices in identifying needs in rural areas, including using case studies and success stories, sharing information, and better visualizing equity in rural areas across the state** (Task 3, RPCs). • Community members with vehicles in some communities have volunteered to help other community members access essential services and transport kids to school. In addition, there is existing access to state-funded rides to medical appointments, although the rides can be unpredictable. **Agencies could consider helping to facilitate, organize, or coordinate these efforts, and potentially provide resources to aid in transportation efforts, if appropriate and if capacity allows** (Task 3, Direct).

4.5 PILLAR 4: CONTEXTUAL EQUITY: SERVICE PROVISION

Framing questions:

- Are the services of the Agency and RPCs provided in an equitable manner?
- Are the services available to all members of the population – regardless of ability, income, language, etc.?

Task 4 Component	Task 2 and 3 Findings
Needs: What Should Happen	- National Best Practices/Guidance: - As a recipient of federal funds, VTrans and RPC services must comply with the mandates and regulations set out by *Title VI of the 1964 Civil Rights Act, Executive Order 12898: Federal Actions to Address EJ in Minority Populations and Low-Income Populations, and Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency* regulations. For Title VI and E.O. 12898, agencies are required to identify disadvantaged population groups protected under the mandates/regulations and determine whether or not the transportation project or policy have a disproportionate impact on these populations.[ii] For E.O. 12898, agencies are required to provide federally funded, accessible services, programs, and activities for LEP populations[iii] (Task 2, VTrans). **Ensure that communications materials about Agency services are accessible for people of different backgrounds and abilities.** This could include the provision of materials in multiple languages, the inclusion of visual and auditory aides at events, or the facilitation of community connections with advocacy organizations and local media outlets to ensure all populations in an area are being reached.[iv] - RPC Best Practices/Guidance: - RPCs can provide resources and guidance to communities who have insufficient resources compared to other communities, such as aiding with grant applications or municipal projects (Task 2, RPCs). - Service provision needs for underserved populations: - School bus service or expanded public bus service that aligns with school times, and the provision of stop lights, pedestrian signals, pedestrian paths, and bridges that enable safe

Task 4 Component	Task 2 and 3 Findings
	access for kids to get to school and transit-reliant families to get to work and the grocery store (Task 3, Direct). o **More direct communication and provision of information such as flyers at bus stops or announcements from drivers detailing route closures and changes (Task 3, Direct).** o **Greater interconnectivity between small towns and urban areas for shuttle and bus services (Task 3, Direct).** o Organizing and providing accessible information and greater communication opportunities for the public (Task 3, Direct). o **Increase access to programs and services for limited English-speaking populations (Task 3, Direct)**
Existing Offerings: What is Happening	• VTrans Current Practices: o As a recipient of federal funds, VTrans services must comply with *Title VI*, and VTrans uses *Federal Highway Administration Title VI Program guidance* to ensure the agency is compliant with Title VI. Compliance at the VTrans division level is dictated by the guidance. Additional tools and strategies for compliance can be found in the *VTrans Public Involvement Guide*. VTrans measures and reports the level of equitability of service provision to the rest of the agency using FTA Title VI reports (Task 2, VTrans). o Currently, community organizations may focus more on procedural equity while VTrans might focus more on service delivery (Task 3, Stakeholder). There may be opportunities for overlap or better integration between these two approaches to improve ultimate equity outcomes. • RPC Current Practices: o Each RPC has a Title VI plan with VTrans which defines the minimum expectations for how equity should be considered (Task 2, RPCs). o Some RPCs report a lack of resources in being able to educate community members on the process of project planning and development. Mechanisms are required to connect community members to relevant resources (Task 3, RPCs).

Task 4 Component	Task 2 and 3 Findings

	• Service provision challenges experienced by underserved populations or community organizations:
	    ○ Online information about public transit and other transportation services is not accessible to community members with limited English proficiency, or those without access to internet (Task 3, Direct).
	    ○ Route closures and changes not communicated clearly or effectively (Task 3, Direct).
	    ○ Taxis and TNCs are desired, especially for medical appointments, but are often inaccessible due to cost or scarcity (Task 3, Direct).
	    ○ Cultural/language facilitators from the community have tried to create greater access to opportunity and resources but face structural racism and limitations to language access in government systems (Task 3, Direct).
	    ○ Community organizations were not aware of any known equity-improvement policies or programs already in place, pace for equitable change is very slow, gap in relationships with statewide groups, lack of engagement re: policy, program, and project design (Task 3, Stakeholder).
	
	• Service provision successes experienced by underserved populations or community organizations:
	    ○ Free use of public transportation for communities that recently went 'fare-free' (Task 3, Direct).
	    ○ Public Transit work with Old Spokes organization to provide bikes as first/last mile option for people within 5 miles of transit stop; Old Spokes is also considering an e-bike program (Task 3, Stakeholder).
	    ○ Notch Healthcare (federal healthcare center) offers free bikes and free kayaks, and transports people to appointments using vans (Task 3, RPCs).
	
	• Policies/programs in place to prioritize equity:
	    ○ DMV programs include interpretation services and not requiring documentation of immigration/resident status (Task 3, Stakeholder).
	    ○ Public Transit services focus on increasing access to public transit and job centers in rural areas through targeted services such as providing Dial-a-Ride services, Elderly and

Task 4 Component	Task 2 and 3 Findings
	Persons with Disabilities transportation services, and a Mobility for All Program. The VTrans Public Transit division additionally institutes a fixed price range for demand response services (Task 3, Stakeholder).
	o No specific programs for RPCs but some have equity committees or hired consultants to improve equity outcomes (Task 3, Stakeholder).
	• Road maintenance primarily affects community members with personal vehicles, who tend to be wealthier (Task 3, Direct).
Gaps/Opportunities: Difference Between Needs and Existing Offerings; Potential Growth Opportunities	• Community members voiced the need for more reliable, accessible, and effective communication from agency service providers. Residents discussed reliability challenges resulting from poorly communicated public transit service updates and road closures, and information accessibility challenges for community members who are limited English speakers. **There is an opportunity to better organize and communicate transportation information and updates for residents, and to increase accessibility of this information for limited English-speaking residents. To ameliorate these issues. Responsible agency service providers should regularly post service updates online in multiple languages and provide flyers or handouts at bus stops in multiple languages for long term route changes.**
	• Community members living in rural areas expressed a need for an increase in affordable, reliable, and safe transportation opportunities from places of residence to essential destinations. Residents desire greater connectivity between small towns and urban areas for shuttle and bus services, and for more affordable and more frequently available taxi and TNC service to provide access to medical appointments. Community members also discussed the need for more extensive and well-maintained bike/ped infrastructure to enable safe access and connectivity to school, affordable housing, and workplaces. These are complementary strategies to transit services. **VTrans and RPCs should work together to facilitate the investment and deployment of affordable commuter bus/shuttle options, safe and well-maintained bike/ped infrastructure, and consider subsidizing taxi, TNC, or micro transit riders to commuter and essential services such as medical appointments for underserved**

Task 4 Component	Task 2 and 3 Findings
	populations to enable greater, and more reliable transportation connectivity, especially in rural areas. • Community members serving as cultural or language facilitators have struggled to provide greater access to information and service resources for non-English speakers due to inaccessibility resulting from structural barriers at the government level. **VTrans and RPCs should work together to improve accessibility by providing materials in culturally accessible formats and culturally appropriate languages and ensure that these materials are widely distributed through various mediums (e.g., flyers, on agency website, social media).** To reduce language barriers and improve accessibility for community members with disabilities, agencies should include translation capabilities and visual and auditory aides at engagement events, provide accessible accommodations, and include community advocacy organizations at outreach events to foster trust and facilitate honest conversations with community members. To provide language support, cultural interpretation, and facilitate access to essential services and systems for non-English speaking community members, agencies could additionally consider working with younger community members with English language skills at engagement events. Agencies should ensure to fairly compensate translators, advocacy organizations, and cultural liaisons from the community for their time. • Community organizations expressed that they were unaware of equity-improvement policies or programs in place for equitable service provision at VTrans, and that community organizations focused more on procedural equity while VTrans focused more on service delivery. **This represents an opportunity for overlap or better integration of procedural equity in service provision, and opportunities for collaboration between VTrans and community organizations to facilitate more equitable service provision.**

4.6 PILLAR 5: CORRECTIVE EQUITY: PRIORITIZATION PROCESS

Framing questions:
- How will future actions (investments, policies, etc.) deliver equitable outcomes?
- Are there any efforts to include equity-based measures in project scoring and investment priorities?

Task 4 Component	Tasks 2 & 3 Findings
Needs: What Should Happen	- National Best Practices/Guidance: **Agencies should consider incorporating multiple equity-oriented prioritization criteria** (e.g., improved access to destinations used by and benefiting communities of concern, and community support of project) in the project prioritization process that focus on mitigating inequity, improving existing conditions, and incorporating communities of concern into the planning process[v] (Task 2, National Insights). - Agencies should **evaluate the benefits (added points) and detriments (subtracted points)** of potential projects with respect to a variety of equity-focused demographic groups (e.g., race, income, geographic location, disability, LEP) (Task 2, National Insights). **Through adjustments in project weighting, prioritize funding to projects/plans that address disproportionate or detrimental impacts identified by equity analysis and brought on by current transportation system** (Task 2, Guidance and Successful Practices). - Agencies can use project prioritization methods to **focus investments in disadvantaged areas and for disadvantaged populations** most-reliant on agency services to reduce service inequities and improve outcomes for communities of concern. Agencies should provide documentation and evidence of how a project improves equity outcomes and meets the needs of disadvantaged communities (Task 2, Guidance and Successful Practices). - Prioritization Practices/Guidance from Engagement: - VTrans stakeholders advocated to include an equity framework with equity-focused criteria in the project prioritization process. **To determine equity-focused criteria, VAPDA recommended that VTrans review national best practices, determine which**

Task 4 Component	Tasks 2 & 3 Findings
	populations are likely to use/rely on a given project, consider the impacts of historic disinvestment in certain areas, and incorporate greater support for rural areas lacking resources and staff (Task 3, Stakeholder). ○ VTrans and community organizations requested greater data availability (e.g., socioeconomic, demographic, and equity-based data) to help with project decisions. Similar to the needs identified in Pillar 1 (Task 3, Stakeholder). ○ Utilize local information to supplement census data for planning efforts (e.g., data from Town Clerk, school lunch data, school transportation data, etc.). Provide insights on how best to use this data to make the process as consistent as possible but also reflect the local conditions. (Task 3, RPCs).
Existing Offerings: What is Happening	• VTrans and RPC Current Practices: ○ Project prioritization is guided by the *VTrans Project Selection and Prioritization Process (VPSP2) program*, which dictates how projects are prioritized and how funding is allocated, using safety, asset condition, mobility and connectivity, economic access, resiliency, regional community, environment, and health access as evaluation criteria. The prioritization process does not include equity explicitly or include a process for identifying disadvantaged communities or needs (Task 2, RPCs, Task 2, VTrans). • Current prioritization strategy challenges: ○ VAPDA representative noted that VTrans treated rural communities with limited resources the same as communities with far more resources (Task 3, Stakeholder). ○ RPCs voiced that the VPSP2 process standardized the prioritization process, but didn't include local voice in the process, wasn't clear on how active mode safety issues were evaluated and didn't have an explicit equity element (Task 3, RPCs). ○ There is considerable variation in how RPCs consider, understand, prioritize, and evaluate equity in the decision-making process. RPCSs use both qualitative and quantitative metrics to measure and consider equity. RPCs acknowledge there is room for improvement and that in some cases equity is not considered (Task 3, RPCs). ○ Some members of community organizations felt there should be less focus on maintenance and more focus on expanding access (Task 3, Stakeholder).

Task 4 Component	Tasks 2 & 3 Findings
	○ Some RPCs requested greater guidance for *VTrans' Transportation Planning Initiative (TPI) process* (a transportation planning program designed to support public participation that is conducted via a partnership between VTrans and the RPCs)[vi] to consider and prioritize equity in the community engagement and decision-making processes (Task 3, RPCs). - Prioritization Techniques and Strategies to Address Needs: ○ VTrans leverages federal and state funds and cost shares with partners (e.g., Human Services) to provide more resources to address public transit rider needs (Task 3, Stakeholder). ○ In addition to quantitative metrics used to evaluate the impact of projects during the prioritization process, qualitative information is collected through public engagement events facilitated with local stakeholders including RPCs, local municipalities, local boards through providers, and citizens and law enforcement who engage the public together (Task 3, Stakeholder). ○ To ensure impacts for all populations are considered, VTrans and RPCs utilize the appropriate actions from Pillars 1 and 2. These include equitable engagement strategies: conduct engagement at fairs and schools, forums, and mobility committees, remove language barriers, provide compensation, and focus engagement efforts on key populations or areas of concern (Task 3, Stakeholder).
Gaps/ Opportunities: Difference Between Needs and Existing Offerings; Potential Growth Opportunities	- In collaboration with RPCs, **VTrans should incorporate equity-based prioritization criteria into the VPSP2 program that focus on mitigating inequity (past burdens and injustices and current conditions), improving existing conditions, and incorporating communities of concern into the planning process.** Agencies could evaluate the benefits and detriments of potential projects with respect to equity-focused demographic groups and should consider how similar projects in the past have positively or negatively impacted diverse populations. - RPC staff and community members identified a lack of transparency in how the transportation system is funded, what the composition of funding is across different program or areas, what tradeoffs are made, where local collaboration occurs, and who makes the final decisions. Several groups voiced concerns that urban areas seemed to be receiving a disproportionate amount of

Task 4 Component	Tasks 2 & 3 Findings
	investment in comparison to rural areas. In response to this, **VTrans and RPCs should work towards implementing greater prioritization and funding practice transparency, including a report back of decision-making rationale, and providing time and space for discussions with community groups to clarify questions about how and why decisions were made.** VTrans and RPCs could also provide greater clarity on their websites, on project sites, and at community meetings about the timeline of major decisions, including when, where, and how community members can voice their opinions. Lastly, agencies should make greater efforts to communicate to community members and RPCs about the methodology used in the project prioritization process and provide opportunities for feedback on these methodologies (Task 3, Stakeholder, Task 3 RPCs). • **An additional opportunity exists between VTrans and RPCs to improve alignment and coordination with one another regarding the VPSP2 program and VTrans' Transportation Planning Initiative (TPI) process**. Education efforts on VTrans' behalf to better communicate the function and design of the VPSP2 program could improve transparency and understanding for RPCs. Both agencies could additionally consider collaboration opportunities for the development and conduct of these two processes to better consider and prioritize equity in the community engagement and decision-making processes (Task 3, RPCs).

4.7 PILLAR 6: CORRECTIVE EQUITY: ONGOING PERFORMANCE MANAGEMENT

Framing questions:
- How will progress toward equitable outcomes be monitored and measured?
- What indicators are used? What is currently being done to track performance measures across communities?

Task 4 Component	Tasks 2 & 3 Notes
Needs: What Should Happen	- National Best Practices/Guidance: - One way to evaluate the equity of past expenditures: segment projects by mode for separate analysis and determine if investment spending was allocated equitably based on the distribution of disadvantaged populations, and the current use of each mode by disadvantaged populations (Task 2, Guidance and Successful Practices). - After integrating equitable practices in the project prioritization process, agencies should conduct regional analyses to **monitor and evaluate equity outcomes for disadvantaged populations to see if inequality is decreasing and to see if equity prioritization measures are effective** (Task 2, National Insights).[vii] **To measure and monitor outcomes: select performance measures that enable agencies to evaluate overall service performance as well as service performance for specific communities of concern. Chosen performance measures should measure the impact of transportation system performance on disadvantaged populations, quantitatively evaluate differences between population groups, and document evidence of disproportionate incidence of poor performance for communities of concern** (Task 2, Guidance and Successful Practices). - Methods of monitoring and managing progress towards equitable outcomes: - Public Transit operators noted that rider surveys and annual route performance reports could be used as evaluation metrics for accountability (Task 3, Stakeholder). **To implement an equity-based framework: Stakeholders suggested early coordination, continuous collaboration, having a flexible, accessible, and intentional model, providing training, and integrating the framework into onboarding, having dedicated staff people to be the equity point person or to work**

Task 4 Component	Tasks 2 & 3 Notes
	with specific populations, and having a process for improving the framework (Task 3, Stakeholder). o RPCs reported widespread interest in reporting spending measures by geographic region or per capita in order to put numbers into context and compare geographic equity of spending (Task 3, RPCs). o Utilize leaders or champions of the equity framework within the Agency: Policy, Planning, and Intermodal Development Division, Planning coordinators, Public Transit, DMV, Construction department in Highway Division and Project Delivery Bureau, Direct reports of Chief Engineer of Highway Division, specific agency leaders such as the Central Vermont RPC Director, and the NAACP (Task 3, Stakeholder). • Needs with respect to monitoring and managing progress towards equitable outcomes: o The Highway Division and VAPDA requested resources, including expressing the **need for a clear definition of equity** in tangible or operational terms, data, a survey for tracking outcomes, tools, or processes to be shared agencywide, and greater support by the agency in following policies/guidance already developed (Task 3, Stakeholder). o Regarding the Equity Framework: the framework should be flexible enough to apply to capital projects and ongoing programs/services. Some stakeholders requested clear guidance or a checklist to implement the Equity Framework internally, and others wanted the framework to become integrated into the agency's culture and get everyone onboard with goals and objectives (Task 3, Stakeholder).
Existing Offerings: What is Happening	• There are several equity-based federal regulations and policies which dictate the goals, metrics, and requirements that must be tracked for compliance purposes. This includes the following key mandates: o Historical Federal Regulations/Policies: ▪ *Title VI of the Civil Rights Act of 1964* (Title VI) prohibits intentional discrimination based on race, color, and national origin for recipients of federal funding. UD DOT Title VI regulations additionally cover unintentional actions or actions of discrimination, and track and monitor the impact of federally designated funds on underrepresented groups (Task 2, National Efforts).

Task 4 Component	Tasks 2 & 3 Notes
	▪ *1994 Executive Order 12898* – Federal Actions to Address EJ in Minority Populations and Low-Income Populations provided directives for federal agencies to create Environmental Justice strategies which identify and analyze the health and environmental impacts of federally funded projects on minority and low-income communities (Task 2, National Efforts). ▪ *2000 Executive Order 13166* – Improving Access to Services for Persons with Limited English Proficiency requires agencies to provide federally funded, accessible services, programs, and activities for LEP populations, but doesn't require an analysis of disproportionate or detrimental impacts (Task 2, National Efforts). o Recent Federal Regulations/Policies: ▪ *2012 USDOT Order 5610.2 (a) and FHWA Order 6640.23 (a)* – Complementary orders updating agency EJ orders, considers EJ principles through both agencies' programs, policies, and planning efforts, highlights importance of considering principles early in planning efforts to reduce adverse effects on disadvantaged communities (Task 2, National Efforts). ▪ *2015 FHWA Environmental Justice Reference Guide* – Created during the Obama-Biden Administration, provided state DOTs and RPCs guidance on complying with EJ requirements (Task 2, National Efforts). ▪ *2021 Justice40 Initiative* – Goal of delivering 40% of federal investments in climate and clean energy (including sustainable transportation) to disadvantaged communities. Includes interim guidance for federal agencies including documentation detailing how agencies can identify benefits for included programs, determine the distribution of benefits, and calculate and report on the 40% goal. Biden-Harris administration released *Climate and Economic Justice Screening Tool (CEJST)*; a mapping tool used to help federal agencies identify disadvantaged communities as part of Justice40 (Task 2, National Efforts). ▪ *2021 Executive Order 13895* – Advancing Racial Equity and Support for Underserved Communities Through the Federal Government: USDOT released

Task 4 Component	Tasks 2 & 3 Notes

	RFI on transportation equity data that could aid USDOT in evaluating transportation program and policy inequities (Task 2, National Efforts).
	
	▪ *2022 US DOT Equity Action Plan* – Recognizes equity in transportation planning with four equity actions: wealth creation, intervention through direct hands-on technical support, empowering communities in decision making, and expanding access to affordable transportation options to bring economic mobility and transportation benefits. Introduces the use of equity performance indicators:
	
	    • State DOTs and the largest 100 MPOs must adopt a quantitative equity screening component to their STIP/TIP development processes by 2030.
	    • By 2025, increase the number of USDOT discretionary grant applications by 5% from disadvantaged communities who have never applied for USDOT funding before.
	    • Increase USDOT direct contract funds to small, disadvantaged businesses from 18.2% in 2021 to 22% by 2026.
	    • Reduce national transportation cost burden by 5%, including transportation travel cost as a percent of income, by 2030 (Task 2, National Efforts).
	
	• VTrans and RPC Current Practices:
	    ○ VTrans has Title VI-specific staff members to maintain statistical data by race and national origin, conduct reviews, investigate complaints, and provide a Division and Department report identifying additional needs and patterns of non-compliance (Task 2, VTrans). RPCs additionally follow the required monitoring put forth by Title VI. Dashboards can be used to document performance measures, but equity is not explicitly measured or monitored via the dashboards (Task 2, RPCs, Task 2, VTrans).
	
	• No community organizations knew of evaluation or accountability strategies for equity used by VTrans (Task 3, Stakeholder).

Gaps/ Opportunities: Difference Between Needs and Existing	• Considering the lack of information understood by community organizations about VTrans' evaluation or accountability strategies for equity, **there is opportunity for greater transparency and greater provision of information regarding methodologies used to account for equity in agency service performance monitoring and management**. In addition to internal agency

Task 4 Component	Tasks 2 & 3 Notes
Offerings; Potential Growth Opportunities	reporting on Title VI compliance, VTrans (and RPCs) could implement additional public reporting and provide opportunities for community members to ask questions and foster dialogue about reporting metrics. **Both VTrans and RPCs utilize interactive dashboards to monitor key performance metrics. If equity were incorporated as a performance measure or lens applied to existing performance measures, it could be better monitored and measured** via accessible dashboards made public to community organizations and community members. VTrans should work with RPCs to conduct regional analyses to see the impact of equity-focused projects on communities of concern and monitor the effects to determine if inequities have decreased. • Among VTrans employees and community organizations, there were various interpretations of the definition of equity, as well as how equity was measured and understood at the agency level. **There is an opportunity in the development of an equity framework to define equity on operational terms, collect data that indicates the equity of service performance, utilize surveys, tools, and processes to track outcomes and share monitoring metrics agencywide, and emphasize the importance of adherence to preexisting policies and guidance used to emphasize equitable outcomes.** • Stakeholders reported a desire for framework flexibility so it could be applied to both capital projects as well as ongoing programs, and many felt that clear guidance would be imperative to the successful implementation of an equity-based framework. In terms of incorporating an equity framework into the project prioritization, decision making, and planning processes, **VTrans and RPCs should emphasize early coordination among key stakeholders (including community members), continuous collaboration, flexibility, and accessibility, have dedicated staff to work with and facilitate dialogue with key community groups, and integrate an iterative feedback process to improve the framework.**

ENDNOTES

[i] US Department of Transportation: Federal Highway Administration (FHWA). Environmental Justice Analysis in Transportation Planning and Programming: State of the Practice. February 2019. https://rosap.ntl.bts.gov/view/dot/43567

[ii] FTA. 2012. Title VI Requirements and Guidelines for Federal Transit Administration Recipients. FTA C 4702.1B. Retrieved from: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

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[iii] FTA. 2012. Limited English Proficiency (LEP) - Title VI Requirements and Guidelines for Federal Transit Administration Recipients. FTA C 4702.1B. Retrieved from: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

[iv] US Department of Transportation: Federal Highway Administration (FHWA). Environmental Justice Analysis in Transportation Planning and Programming: State of the Practice. February 2019. https://rosap.ntl.bts.gov/view/dot/43567

[v] Krapp, Agustina, Jesus M. Barajas, and Audrey Wennink. 2021. "Equity-Oriented Criteria for Project Prioritization in Regional Transportation Planning." Transportation Research 32 Record. https://doi.org/10.1177/03611981211001072

[vi] VTrans. Transportation Planning Initiative (TPI). 2018. https://vtrans.vermont.gov/sites/aot/files/planning/documents/TPI%202018.pdf

[vii] Krapp, Agustina, Jesus M. Barajas, and Audrey Wennink. 2021. "Equity-Oriented Criteria for Project Prioritization in Regional Transportation Planning." Transportation Research 32 Record. https://doi.org/10.1177/03611981211001072