



Department of Transportation
Division of Highway and Bridge Maintenance
360 Lincoln Avenue
Warwick, RI 02888

May 31, 2018

Ms. Margaret Griffin
U.S. Department of Transportation
Federal Transit Administration
Regional Civil Rights Officer
Office of Civil Rights
55 Broadway, Rm 926
Cambridge, MA 02142

Dear Ms. Griffin,

I am pleased to inform you that RIDOT's Title VI Program for 2018-2021 has been uploaded into TRAMS for your agency's review and approval. RIDOT's Title VI Program is consistent with FTA Circular 4702.1B and contains all the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating *less than* 50 vehicles in peak service.

Should you have any questions, please do not hesitate to contact the Civil Rights Administrator, Kelly M. Caesar, Esq., at (401) 222-3260 Ext. 4405

Sincerely,

A handwritten signature in blue ink, appearing to read 'Peter Alviti Jr.', is written over the word 'Sincerely,'.

Peter Alviti Jr, P.E.
Director

MAY 25 2018

ROUTING SLIP

ACTION SLIP

RHODE ISLAND DEPARTMENT OF TRANSPORTATION

REFERRED TO: Director Peter Alviti, Jr, P.E.

DATE: 5/24/18

FROM: Dina Quezada, Title VI Coordinator *DQ*

ITEM: RIDOT's 2018-2021 Title VI Program for FTA. No signature needed on document - approval will be on routing sheet. Signature needed on letter to FTA Regional Civil Rights Officer, Margaret Griffin.

Submission Deadline: May 31, 2018. To be uploaded into FTA's Transit Award Management System (TrAMS).

Attachments: Triennial Title VI Program Checklist from FTA C 4702.1B.
Record of last submission (July 2015)

*** PLEASE ROUTE AS SHOWN BELOW ***

ROUTING FOR APPROVAL

		ROUTING - FOR APPROVAL			
	NAME	INITIALS	DATE	APPROVE	DISAPPROVE
1	Kelly M. Caesar, Esq. Civil Rights Administrator	<i>KMC</i>	<i>5/25/18</i>	<i>✓</i>	
2	Vera Querceto, Esq. Chief Legal Counsel <i>As to item 4</i>	<i>VHQ</i>	<i>5/29/18</i>	<i>✓</i>	
3	John Igliazzi, Esq. Assistant Director for Legal Services / Acting Chief of Staff	<i>[Signature]</i>	<i>5/30/18</i>		
4	Peter Alviti, Jr, P.E. Director	<i>[Signature]</i>	<i>5/30</i>		
	Return to: Dina Quezada				



2018

FTA TITLE VI PROGRAM



Rhode Island Department of
Transportation

6/1/2018

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INTRODUCTION

The Rhode Island Department of Transportation (RIDOT) is a recipient of federal financial assistance from the Federal Transit Administration (FTA) for the purpose of providing safe, efficient and on-time transit services with focus on customer service that underscores a commitment to diversity, inclusion and fairness. At RIDOT, these core principles and values have been translated into policy¹ to ensure that no person is excluded from participation in, denied the benefits of, or are subjected to discrimination in the receipt of RIDOT's transit services on the basis of race, color or national origin.

RIDOT is committed to the Title VI of the Civil Rights Act of 1964 and to fulfil its nondiscrimination commitment through the adoption of policies and procedures which have been designed with appropriate safeguards to: inform the public of their rights under Title VI, including the right to file discrimination complaint with RIDOT; promote full and fair public participation in the transportation decision-making process; ensure meaningful access of Limited English Proficient persons to transit services; monitor the operation of its sub-recipients to ensure nondiscrimination in the delivery of public transit services; and prevent disparate impacts of transit programs, services, and activities.

RIDOT compiled this Program with the purpose of disseminating these safeguarding policies and procedures and of providing its employees and sub-recipients with a guide on how to adhere Title VI principles into their daily planning, implementation, and monitoring operations.

RIDOT compiled this Program with the purpose of disseminating these safeguarding policies and procedures and of providing its employees and sub-recipients with a guide on how to adhere Title VI principles into their daily planning, implementation, and monitoring operations.

¹ A copy of RIDOT's Title VI/Nondiscrimination Policy can be obtained by contacting the Title VI Coordinator by telephone, mail, and/or by visiting RIDOT's website at http://www.dot.ri.gov/about/who/civil_rights.php. RIDOT's Title VI/Nondiscrimination Policy has been identified as a vital document and translated into Spanish, per RIDOT's 2018 Four-Factor Analysis (See Chapter 6, Language Access Plan).

With the adoption and dissemination of said safeguarding policies and procedures, RIDOT aims to ensure nondiscrimination in its overall program delivery in compliance with federally-mandated statutes, including but not limited to:

1. Title VI of the Civil Rights Act of 1964 – prohibits discrimination on the basis of race, color, and national origin (42 USC Section 2000d)
2. Federal Transit Laws, as amended (49 USC Chapter 53 et seq.)
3. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended – prohibits unfair treatment of persons displaced by federal and federal-aid programs and projects requiring acquisition of property (42 USC 4601, et seq.)
4. U.S. DOT Regulation, “Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964” (49 CFR Part 21)
5. FTA Circular 4702.1B “Title VI requirements and guidelines for Federal Transit Administration Recipients”
6. FTA Circular 4703.1 “Environmental Justice policy guidance for Federal Transit Administration Recipients”
7. U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (December 14, 2015)
8. Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” - ensures that recipients of federal financial assistance provide meaningful access to LEP applicants and beneficiaries

This Title VI Program has been prepared pursuant to 2012 FTA C 4702.1B, Chapter III(4) to ensure that the level and quality of transit services provided by RIDOT are provided in a nondiscriminatory manner. It contains all the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than 50 vehicles in peak service. It will be implemented during the course of the next three years and will supersede RIDOT’s current 2015-2018 Title VI Program upon FTA’s review and approval.

RIDOT’s Director and staff were actively involved in the development of this program. Comments and suggestion on this Program are welcomed and may be addressed to:

Rhode Island Department of Transportation
Office of Civil Rights
Attn: Dina Quezada, Title VI Coordinator
Two Capitol Hill
Providence, RI 02903
Phone: 401.222.3260 Ext. 4456
Email: Dina.I.Quezada@dot.ri.gov

NOTICE TO THE PUBLIC

FTA C 4702.1B, Chapter III (4)(a)(1) – Requirement to Notify Beneficiaries of Protection Under Title VI

RIDOT has developed a Title VI Notice to the Public poster to inform the public of their rights under Title VI. The poster reaffirms RIDOT's commitment to complying with Title VI, and informs the public of the protections against discrimination afforded to them by outlining the process for seeking additional information or filing a Title VI complaint with RIDOT.

The Notice indicates that complaints may be filed against RIDOT or any of its transit service providers and contractors. Currently, RIDOT contracts with the Massachusetts Bay Transportation Authority (MBTA) to bring South County Commuter Rail (SCCR) service from Providence to TF Green Airport and Wickford Junction Stations, and with Seastreak, which operates the seasonal Providence-Newport Ferry Service.

The English and Spanish versions of the Notice are displayed at RIDOT's headquarters main public area, its three commuter rail stations (Providence Station, T.F. Green Airport Station, and Wickford Junction Station), the Providence and Newport Ferry Service stations, and on RIDOT's website at http://www.dot.ri.gov/about/who/civil_rights.php.

A copy of the English and Spanish versions of the Title VI Notice to Public is presented on page 4 and 5.

RIDOT operates all programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been subjected to discrimination in violation of the Title VI may file a complaint with RIDOT.

For more information on RIDOT's Title VI program and the procedures to request information, on or to file a Title VI complaint, contact 401-222-3260 ext.4456; email dina.i.quezada@dot.ri.gov; or send correspondence to the Office of Civil Rights at:

Rhode Island Department of Transportation
Office of Civil Rights
Attn: Dina Quezada, Title VI Coordinator
Two Capitol Hill
Providence, RI 02903



Notice to the Public of Protections Under Title VI of the Civil Rights Act of 1964

COMMUTER RAIL USERS

The Rhode Island Department of Transportation (RIDOT) operates its programs and services without regard to race, color, and national origin (including Limited English Proficiency) in accordance with Title VI of the Civil Rights Act of 1964.

Any person who believes she or he has been discriminated against by RIDOT or MBTA may file a discrimination complaint with RIDOT within 180 days of the alleged discriminatory conduct by contacting:

**RI Department of Transportation
Office of Civil Rights
Attn: Dina Quezada, Title VI Coordinator
Two Capitol Hill
Providence, RI 02903
Phone: 401-222-2450 or Toll Free: 1-844-DOT-ROAD
E-mail: dina.i.quezada@dot.ri.gov**

A complaint may also be filed directly with the Federal Transit Administration, Office of Civil Rights, Attn: Complaint Team. East Bldg., 5th Floor–TCR. 1200 New Jersey Ave, SE. Washington, DC 20590

For more information about RIDOT's Title VI/Nondiscrimination Program or if information is needed in another language, please contact the Title VI Coordinator (401-222-2450).

Si necesita información en otro idioma, por favor contactar la Coordinadora del Título VI (401-222-2450).



Sus Derechos Según El Título VI de la Ley de los Derechos Civiles de 1964

USUARIOS DEL SERVICIO DE TREN

El Departamento de Transporte de Rhode Island (RIDOT) opera sus programas y servicios de acuerdo con las leyes antidiscriminatorias de raza, color, y origen nacional (incluyendo el dominio limitado del inglés) según el Título VI de la Ley de Derechos Civiles de 1964.

Cualquier persona que crea que ha sido discriminada por RIDOT o MBTA puede presentar su queja de discriminación a la siguiente dirección dentro de un plazo de 180 días del evento:

**RI Department of Transportation
Oficina de los Derechos Civiles
Atención: Dina Quezada, Coordinadora del Título VI
Two Capitol Hill
Providence, RI 02903
Teléfono: 401-222-2450
Llamada Gratuita: 1-844-DOT-ROAD
E-mail: dina.i.quezada@dot.ri.gov**

Su queja también puede ser presentada directamente con el Federal Transit Administration, Office de los Derechos Civiles, Atención: Complaint Team. East Bldg, 5th Floor–TCR. 1200 New Jersey Ave, SE. Washington, DC 20590

Para más información sobre el Programa antidiscriminatorio del Título VI del RIDOT o si necesita esta información traducida en otro idioma, por favor contactar la Coordinadora del Título VI (401-222-2450).

If information is needed in another language, please contact the Title VI Coordinator (401-222-2450).

COMPLAINT PROCEDURE & FORM

FTA C 4702.1B, Chapter III (4)(a)(2) – Requirement to Develop Title VI Complaint Procedure and Complaint Form

RIDOT has developed a complaint procedure for processing Title VI complaints. This procedure includes a Title VI complaint form (Appendix A) addressing the necessary information to file a complaint under Title VI. A copy of the Title VI Form can be requested via telephone, mail or email and is available on RIDOT's website at http://www.dot.ri.gov/about/who/civil_rights.php.

Consistent with RIDOT's Language Assistance Plan (LAP) of this Program, the Title VI Complaint Form has been identified as a vital document and translated into Spanish (Appendix A).

RIDOT has confirmed that MBTA and Seastreak will document and notify RIDOT of all Title VI complaints received regarding the SCCR and the Providence-Newport Ferry services, respectively.

The Procedure on how to file a complaint

Any person who believes she or he has been discriminated because of their race, color, or national origin by RIDOT or any of its transit service providers (MBTA and Seastreak) may file a Title VI complaint via telephone, mail, or email. Via email, the complaint is filed by completing and submitting to the attention of RIDOT's Title VI Coordinator the Title VI Complaint Form available at RIDOT's website at http://www.dot.ri.gov/about/who/civil_rights.php.

RIDOT will investigate complaints filed within 180 days after the last date of the alleged discrimination – although it encourages complaints to be filed immediately. Complaints may be filed against RIDOT, MBTA, Seastreak, or any other RIDOT subrecipient or contractor. A person may file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team. East building, 5th Floor – TCR, 1200 New Jersey Avenue, SE. Washington, DC 20590.

Once the complaint is received, RIDOT will review it to determine if it has jurisdiction and to determine the appropriate process for investigating the complaint in accordance with the RIDOT's *Procedures for Processing and Disposition of Discrimination Complaints*. A copy of the *Procedures* can be requested via telephone, mail or email and is available on RIDOT's website at http://www.dot.ri.gov/about/who/civil_rights.php

The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by RIDOT and, when applicable, a complaint consent/release form to be completed and returned to RIDOT within 15 days of the date of RIDOT's correspondence acknowledging receipt of the complaint. RIDOT has 60 days to investigate the complaint.

ACTIVE TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

FTA C 4702.1B, Chapter III (4)(a)(3): Requirement to Record and Report Transit-related Title VI Investigations, Complaints, and Lawsuits.

RIDOT has not received any Title VI complaints -- directly or through its subrecipients and contractors -- or conducted any investigations since the filing of its 2015-2018 Title VI Program. Moreover, RIDOT has not been the subject of any transit-related Title VI investigations conducted by entities other than FTA, nor has it been named in any lawsuits or complaints that pertain to allegations of discrimination based on race, color, or national origin in transit-related activities.

RIDOT Title VI Complaint Log (2015-2018)				
	Date	Summary (Protected Classes)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

PUBLIC PARTICIPATION PLAN

FTA C 4702.1B – Chapter III (4)(a)(a): Promoting Inclusive Public Participation

RIDOT recognizes that early, continuous and meaningful public participation is a fundamental tool to achieve compliance with Title VI of the Civil Rights Act of 1964 and ensure that “no person in the United States, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” To that end, RIDOT has developed a Public Participation Plan (PPP) that creates opportunities for transit stakeholders to be involved in the assessment of potential social, economic and environmental impacts associated with the South County Commuter Rail (SCCR) as well as other projects that RIDOT may undertake.

This PPP identifies goals and outreach strategies for early, continuous and meaningful public involvement, and integrates targeted outreach to reach and engage populations that have been underserved and/or have lacked access to the transportation decision-making process, such as Environmental Justice populations and Limited English Proficiency (LEP) populations. LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes persons who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Barriers in Reaching Stakeholders

Engaging underserved populations in transportation planning in their community creates unique challenges when conducting outreach. Neighborhoods where a larger concentration of LEP populations reside or where many of the residents work multiple jobs may be harder to involve than more affluent demographic groups. Following are some of the barriers and RIDOT’s plan to best overcome them.


Educational Differences

Poverty has been clearly linked to educational levels. Lower-income families are less likely to have the financial resources or time availability to provide children with academic support. Participating in complex transportation projects can be overwhelming for someone with literacy issues or minimal education. When faced with this, many adults would opt to avoid these interactions for fear of being embarrassed. To overcome these challenges, transportation planners can rely on visualization tools and visual preference surveys to solicit input. Furthermore, information should be written in short, clear sentences for maximum effectiveness. Staff should be trained on how to identify a person with literacy issues and how best to engage them so that they feel comfortable and safe in presenting their opinions.

Social and Cultural Gaps

Social and cultural gaps can manifest in many ways. For example, in some Asian cultures, a general postcard would be perceived as disrespectful. An invitation to a meeting or event would be much better received from a person they know through a phone call or face-to-face interaction. Other cultures might see it as rude for you to invite them to an evening meeting and not serve food.

Understanding cultural nuances can go a long way to building rapport and facilitating the exchange of information with minority groups. Learning about the cultures you are trying to engage is a critical first step for any public involvement practitioner. This can be achieved through one-on-one interviews with local community leaders or even talking with co-workers who share a similar culture. Finally, it is also important to realize that not all minority populations are low-income and not all low-income populations are minority.



Understanding **cultural nuances** can go a long way towards **building rapport** and **facilitating the exchange** of information with minority groups.

Mistrust of the Government

Many immigrant populations have a strong distrust of the government. Some may have this distrust because they are in the United States undocumented and some may distrust because of their past experiences in countries with corrupt or militant governments. When public transit agencies seek to communicate with immigrant populations, the immigrant may not be able to distinguish between the public transit agency and other parts of the government. Local community or religious leaders and school teachers may have an established relationship with immigrant populations based on a foundation of trust. Enlisting the assistance of local community or religious leaders and school teachers may increase the trust among immigrant communities and the public transit agency. Holding or advertising meetings in local venues may also be an effective strategy for reaching a substantial portion of the immigrant population.

Financial Challenges and Family Obligations

In communities where residents may be working more than one job, or where the incidence of single-parenting is higher than average, many residents may have basic personal responsibilities that make it difficult to attend public meetings. Residents working for hourly wages, odd hours or longer shifts make it necessary to schedule outreach events in a manner that provides multiple opportunities to discuss project issues. It may be difficult to predict the optimal schedule within which to reach out to different low-income and minority communities, so RIDOT staff should hold meetings during both day and evening hours and on weekends to best engage a particular community. It is also a good idea to get input from community members to determine meeting times that maximize attendance. RIDOT outreach efforts should also include basic support to help families handle issues of child care. Providing "play rooms" with volunteer monitors may make it easier for parents to attend meetings. Holding meetings as part of or directly after regularly scheduled events, such as school or church service, may make attendance at these outreach efforts more convenient.

Providing "play rooms" with volunteer monitors may make it easier for parents to attend meetings.

Outreach Strategies

In all its public outreach efforts, RIDOT strives to exceed the basic requirements of legislation and regulations to provide early, continuous and meaningful outreach to those who are impacted by RIDOT's projects and activities. These outreach efforts are:

- **INCLUSIVE** – Provide inclusive public engagement including low-income, minority, and LEP populations, and other demographic groups that are traditionally underserved.
- **PROACTIVE** – Conduct proactive outreach, beginning by searching out the public and working to elicit input.
- **COORDINATED** – Enhance coordination and communication to improve transportation decision-making.
- **TRANSPARENT** – Provide transparency in public outreach by communicating with the public with timely and accurate information and coordinating and documenting the process.
- **ACCESSIBLE** – Provide the public with adequate notice of public involvement activities, key decision points, and public comment periods; provide access to project information by using

multiple communication tools, and conduct public meetings in accessible and convenient locations.

- **RESPONSIVE** – Respond to public comments in a timely manner and document the process.
- **INFORMATIVE** – Educate and inform the public on technical issues in clear and easy to understand language.
- **INTEGRATED** – Consider and integrate public comments in the design and development of projects.
- **CONTINUALLY IMPROVING** – Continue to improve public outreach by measuring effectiveness of the program and refining public outreach strategies and tools to improve effectiveness.

RIDOT conducts public outreach activities to inform and engage the public in decision-making and to solicit input on needs and concerns. RIDOT typically develops a strategy for public outreach, or Public Involvement Plan (PIP), for all transit-related capital project and transit projects that requires public input. Each PIP integrates a variety of communication tools in a coordinated strategy to reach and engage a broad and diverse audience, including riders, the general public and, in particular, disadvantaged groups. While this document focuses on improving outreach and engagement with Title VI populations, RIDOT is committed to providing public involvement opportunities for everyone. Traditional public involvement activities will remain as part of the toolbox. Following are a series of tables that present tools that RIDOT will consider as the department fulfills its commitment to reach and engage underserved populations.

Title VI/EJ/LEP Best Practices for Outreach

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Sending Flyers Home with Children Targeting schools in low-income and minority communities and asking them to send information home with students.	All	<ul style="list-style-type: none"> Children often serve as translators for parents with Limited English Proficiency and can help make sure the message is delivered. Allows you to target a very specific community. 	<ul style="list-style-type: none"> Flyers that go home with older children may end up in the trash and not reach their intended audience. Requires a significant printing budget as schools can have hundreds of students. 	<ul style="list-style-type: none"> Target elementary schools where teachers send information home to parents in folders. To keep costs down, you can further target kindergarten classes as parents are most likely to read something that goes home with this age group.
Phone Tree Develop a grassroots phone tree where one person contacts a group of people and each of those people contact another group of people.	Minority (Chinese, Korean, and Vietnamese)	<ul style="list-style-type: none"> Perceived as a more personal and culturally appropriate form of invitation in some cultures. Allows for a human touch during the process which helps build credibility and trust. 	<ul style="list-style-type: none"> Phone tree participants may not communicate to the next tier down. Misinformation could be passed on through the phone tree again. 	<ul style="list-style-type: none"> Provide a script when possible. Organize the phone tree and give people the tools they need for success.
Direct Mail An advertising method of mailing ads or letters to large groups of stakeholders.	All	<ul style="list-style-type: none"> Can target a specific population or zip code. Can be perceived as more personal (personalized letters). 	<ul style="list-style-type: none"> Print and mailing can be costly. Can be perceived as more impersonal (standard postcards). Database information can quickly go out of date. 	<ul style="list-style-type: none"> Send out direct mail pieces that are personalized. Send letters out from a trusted person in the community or a key elected official.

Title VI/EJ/LEP Best Practices for Outreach (continued)

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Social Media Advertisements Placement of advertisements on Facebook or promoting “Tweets” or “Feeds” through Twitter.	All	<ul style="list-style-type: none"> Allows for targeting of key audiences. Inexpensive relative to other advertising. Effective for sharing information and growing followers of social media sites. 	<ul style="list-style-type: none"> Limited to Facebook and/or Twitter users. 	<ul style="list-style-type: none"> Link the ad to a Facebook post or Twitter tweet of particular. pertinence to your target audience. For example, if you are closing a bridge that will have a major impact on traffic, an ad with this information is more likely to be clicked through to the social media site.

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Mobile Devices Ensuring that information is easily accessible through mobile devices such as smart phones, tablets and readers.	All	<ul style="list-style-type: none"> The majority of Americans now access the internet through mobile devices rather than through personal computers. 86 percent of Americans access the mobile internet through apps. African-American and Hispanic audiences access social media sites through mobile devices at a higher percentage than other audiences. 	<ul style="list-style-type: none"> Creation of a mobile app can be expensive and may only be justified on large projects. 	<ul style="list-style-type: none"> A mobile app, like other information sources, must be marketed making people aware of its existence.

Title VI/EJ/LEP Best Practices for Outreach (continued)

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Point-of-Presence Displays Use “pump topper” displays or television monitors to advertise upcoming work that will affect travelers in the area	All	<ul style="list-style-type: none"> Takes advantage of a “captive audience” waiting for their fuel tank to fill up. Targets motorists in the area of the planned project. 	<ul style="list-style-type: none"> The ad space must be purchased and the artwork or videos produced. 	<ul style="list-style-type: none"> Use the ads to direct people to additional sources of information.

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Virtual Public Meetings	All	<ul style="list-style-type: none"> Number of participants could far exceed those attending traditional public meetings. People can participate on-demand 24 hours per day, seven days per week. African-American and Hispanic populations could be engaged in larger numbers than through traditional public meetings. 	<ul style="list-style-type: none"> There could be a limit on the number of people able to participate in the live meeting. The virtual meeting technology could fail. 	<ul style="list-style-type: none"> Do a “dry-run” virtual public meeting in advance of the live on-line meeting to ensure the technology is working correctly and those running the meeting are comfortable with the system.

Title VI/EJ/LEP Best Practices for Outreach (continued)

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Door Hangers/Flyers Meeting announcements or informational communication pieces that are delivered to a person’s front door.	Low-income	<ul style="list-style-type: none"> Provides more concentrated outreach to an area that could be the source of the largest number of EJ/LEP participants. Ensures delivery of information even to people who lease or rent. 	<ul style="list-style-type: none"> Door hangers and flyers are subject to weather and wind which can deem them unreadable. Loose dogs can be a hazard. Crime levels in some neighborhoods can pose safety concerns for staff. 	<ul style="list-style-type: none"> Ensure materials are translated into all appropriate languages. Ensure staff delivers flyers with a buddy. Provide staff with dog treats. Ensure staff has charged cell phones during delivery.

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Incentives for Attending Meetings Providing money, prizes, food, or other incentives for attending meetings.	Low-income	<ul style="list-style-type: none"> Encourages increased participation by people who do not traditionally participate in public meetings. 	<ul style="list-style-type: none"> Participants may come to expect incentives. Incentives add to the cost of holding public meetings. 	<ul style="list-style-type: none"> Pick an incentive that is appropriate for your community. Gas cards, grocery store gift cards, small appliances and tablets make nice gifts. Advertise incentives in all outreach materials.

Title VI/EJ/LEP Best Practices for Outreach (continued)

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Childcare at Public Meetings Providing childcare at public meetings can help remove an obstacle to participation and can also be viewed as an incentive by some.	Low-income	<ul style="list-style-type: none"> Eliminates a barrier to participation. Allows mothers to participate knowing their children are cared for. 	<ul style="list-style-type: none"> Can pose liability issues for some organizations. Can add to the cost of a meeting or event. 	<ul style="list-style-type: none"> Hire a professionally licensed and bonded sitter service. Provide activities for children during the meeting. If deemed appropriate, ask parents to sign a liability release form.

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Pulpit Announcements Faith based organizations often have multiple opportunities to make announcements and share information with their congregations on a weekly basis.	All	<ul style="list-style-type: none"> Faith based organizations are often aware of community needs. Some faith based organizations provide direct assistance to impoverished areas and can help target these populations. 	<ul style="list-style-type: none"> Faith based organizations may be skeptical of the motives behind the project. While faith based organizations will often distribute information, they may also take a stance either in favor or against a particular project. 	<ul style="list-style-type: none"> Be authentic, genuine when requesting their assistance in disseminating information. Make sure study objectives are communicated clearly in a non-technical format. Provide them with flyers and other tools necessary for distributing information.

Title VI/EJ/LEP Best Practices for Outreach (continued)

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Publicize through Local and Ethnic/Minority Media Outlets Include local and minority media outlets in your media distribution list.	All	<ul style="list-style-type: none"> Target minorities via radio and television stations favored by this demographic. Allows for disseminating information via additional languages. 	<ul style="list-style-type: none"> Television advertising can be costly. Requires coordination far in advance of meetings or events. May require the identification of spokespeople who can speak other languages. 	<ul style="list-style-type: none"> Avoid using jargon. Translate information into culturally appropriate language, avoid common sayings that may not translate well. Establish relationships with key reporters. Leverage advertising dollars to secure unpaid coverage.

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Rail Car Placards Advertisements found on commuter trains.	All	<ul style="list-style-type: none">• Visibility with low-income and transit dependent stakeholders.• Relatively inexpensive given the reach.	<ul style="list-style-type: none">• Harder to target specific populations or communities.	<ul style="list-style-type: none">• Best used for general public information such as advertising the project hotline, website, and public information office.

Title VI/EJ/LEP Best Practices for Information Dissemination

Informational Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Information Kiosk A station where project information is available in paper or electronic format.	All	<ul style="list-style-type: none"> • Accessible • Convenient • Uses visualizations and graphic information 	Cannot account for literacy issues Can require basic knowledge on how to use technology Can fade into the background.	<ul style="list-style-type: none"> • Brand the kiosk. • Ensure the survey tool is translated into appropriate languages. • Ensure instructions are clear and simple. • Provide a highly visible phone number people can call if they prefer. • Let community leaders know about its presence and ask for their help in spreading the word. • Staff the kiosk at certain times to draw people in and increase return on investment.
Outreach Presentations Schedule presentations to existing groups and organizations. These can include neighborhood associations, women's groups, and other civic organizations.	All	<ul style="list-style-type: none"> • Can target a specific population or zip code. • Provides a built in audience. • Allows messaging to be tailored to specific groups. 	Labor intensive as it requires staff to attend multiple meetings often during the evening hours	<ul style="list-style-type: none"> • Schedule these 2-3 months in advance as agendas often fill up quickly. • Provide translated materials and speakers when possible.

Title VI/EJ/LEP Best Practices for Information Dissemination (continued)

Informational Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Commuter Rail Station Outreach Host a public information booth or intercept survey at a station.	All	<ul style="list-style-type: none"> • Visibility with low-income and other transit dependent stakeholders. • Relatively inexpensive given the reach. 	Depending on transit headways, participants may not have much time to talk	<ul style="list-style-type: none"> • Provide stakeholders printed materials in an easy to carry bag. • Keep surveys or input exercises short so they can be completed quickly. • Secure proper approvals from your local transit agency prior to beginning
Hotlines Provide a phone line for the public to call with questions about the project and/or to provide input.	All	<ul style="list-style-type: none"> • People will have easy access to information and know who to call with questions. • Controls information flow. • Makes the study team more accessible. 	If person staffing the phone cannot provide prompt responses, people may feel like they are getting the run around	<ul style="list-style-type: none"> • Develop lists of frequently asked questions so staff answering the phones can.
Information Boxes Place information boxes in central locations of targeted neighborhoods with regularly updated notices	All	<ul style="list-style-type: none"> • Neighborhoods who may not have access to technological resources will have access to Program impact announcements and general information made available on the website. • Inexpensive. • Targeted directly at areas impacted by the construction. • Measurable. 	People must be aware they are available	<ul style="list-style-type: none"> • Hold public meetings prior to placing info boxes to garner interest.

Title VI/EJ/LEP Best Practices for Engagement

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Pop-up Meetings Holding impromptu meetings in non-traditional locations. These can be advertised in advance or not. These are typically held in targeted communities in areas with a significant amount of foot traffic.	All	<ul style="list-style-type: none"> You can target specific neighborhoods based on demographic information. You can set up during non-traditional meeting hours. You can increase awareness for your project. 	<ul style="list-style-type: none"> You may attract people other than those directly impacted by your project. It may be difficult to gauge the level of participation in advance. You may not get the amount of participation desired. 	<ul style="list-style-type: none"> Select a site that is convenient and has built in foot traffic. Identify local community leaders and ask them to spread the word. Make your display highly visible and inviting. Provide lemonade and cookies or similar light refreshments.
Intercept Surveys Conducting in-person interviews with people at public locations. These could be done in parks, malls, or community events in addition to the station surveys.	All	<ul style="list-style-type: none"> Surveys can be administered verbally by bilingual team members to minimize embarrassment, discomfort, stigmatization, and other feelings that can discourage people with literacy barriers. Surveys can be conducted in targeted communities. 	<ul style="list-style-type: none"> Some minorities may feel uncomfortable speaking to someone who looks like a government official 	<ul style="list-style-type: none"> Keep the survey short so that it can be completed in under 5 minutes. Provide incentives for survey completion when possible.

Title VI/EJ/LEP Best Practices for Engagement (continued)

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Non-Traditional Public Meetings Public meetings held at non-typical locations or at non-typical times.	All	<ul style="list-style-type: none"> Makes information accessible and brings it to people in places and times where they are most comfortable. 	<ul style="list-style-type: none"> Outdoor meetings are subject to weather events. Can be difficult to predict conflicts with the space of time. 	<ul style="list-style-type: none"> Work with community leaders to identify the best times and locations for meeting. Enlist the help of community leaders in getting the word out and how best to advertise to target audiences.
Listening Sessions A public meeting where the primary objective is to listen to community concerns.	All	<ul style="list-style-type: none"> This is a great way to clear the air and let underserved communities air their grievances prior to the start of a new project. 	<ul style="list-style-type: none"> Conversations can get heated and emotional. Conversations may have very little to do with the project at hand. 	<ul style="list-style-type: none"> Hire a professional facilitator with conflict resolution experience. Conduct training with staff to ensure they do not get defensive or argumentative. Take notes and address or forward issues as appropriate.

Title VI/EJ/LEP Best Practices for Engagement (continued)

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
Mobilize Community Ambassadors Identify and train community leaders so they can help disseminate information about the project.	All	<ul style="list-style-type: none"> • Immediate trust and credibility with community being targeted. • They can reach and inform people in a completely non-threatening and safe way. 	<ul style="list-style-type: none"> • May pass on inaccurate information due to limited knowledge. • May not be able to report back feedback effectively. 	<ul style="list-style-type: none"> • Provide ambassadors with a log they can use to document who they talked to and any questions or concerns they may have expressed. • Stay in regular contact with ambassadors and keep them informed of new developments.
Informational Workshops Educational workshops to educate participants on the general transportation planning process or specific initiatives that may affect their community.	All	<ul style="list-style-type: none"> • Helps to build the knowledge basis necessary to effectively participate in the decision-making process. 	<ul style="list-style-type: none"> • Additional costs related to extra meetings. • Not everyone in the community will be at the same educational level. 	<ul style="list-style-type: none"> • Conduct a poll or survey to see what type of information will be most beneficial. • Conduct the workshops on specific topics in advance of meetings related to those topics.

Selection of Meetings Locations

When determining locations and schedules for public meetings, RIDOT will adhere to the following guidelines.

- Schedule meeting at times and locations that are convenient and accessible for low-income, minority and LEP communities. RIDOT maintains a list of accessible meeting locations through the state, and this list is available upon request.
- Employ different meeting sizes and formats including small group and larger open house style meeting formats.
- Coordinate with community organizations, educational institutions, and other advocacy organizations to implement public targeted engagement strategies that reach and engage affected low-income, minority and/or LEP populations within the SCCR service area.
- Consider ethnic and minority radio, television, or newspaper outlets as well as social media platforms to reach and engage low-income, minority and LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

Addressing Comments

All comments received through outreach efforts will be given careful consideration.

Identification of Stakeholders

Stakeholders are persons that may be either directly or indirectly affected by a project activity. Those who may be adversely affected, or who may be denied benefit of a project or activity are of particular interest in the identification of targeted stakeholder groups. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the project or activity at issue, RIDOT has assembled a listing of stakeholders with whom it regularly communicates.

Summary of Public Participation Activity

RIDOT has made several efforts to engage minority and limited English proficient populations in its capital transit projects. The following is a summary of Title VI public outreach activity since the last Title VI Submission in 2015.

Providence Intermodal Transportation Center (PITC)

The PITC is anticipated to be located near Providence Station. The facility will include bus berths, layover space, and passenger amenities. It has been advancing through the planning/procurement stages in 2016-2018. The planning of the PITC is funded via a FTA Tiger grant.

Two meetings were held to obtain public input:

- March 9, 2017 to introduce the project and garner ideas for facility needs; and
- September 11, 2017 to evaluate bus routing alternatives.

Both public meetings were held at the Providence Foundation – a location selected largely due to its close proximity to the state’s primary bus hub, Kennedy Plaza. RIDOT hired Spanish translators to be present for both meetings. Flyers were developed for the meetings in both English and Spanish. The meetings were advertised through RIDOT and RIPTA social media, as well as with press releases. The English and Spanish flyers were also posted to our respective agency websites.

Pawtucket/Central Falls Commuter Rail Station (PCF)

In 2016, RIDOT was awarded a 13.1 million TIGER grant for construction of a new train station in Pawtucket. The preliminary engineering and environmental review (PE/NEPA) work was completed with FTA New Starts funding.

The PE/NEPA phase included significant public outreach that was documented in RIDOT's June 2015 FTA Title VI program. Since publication of that report, the following project-related public outreach meetings have occurred:

August 3, 2016 at the Blackstone Valley Tourism Center: the public was invited to hear project updates.

February 28, 2018 at the Pawtucket Brewers Guild: RIDOT provided the public with updated information related to the station construction while representatives of the cities introduced the public to the transit oriented development (TOD).

RIDOT works closely with the local communities to disseminate public information about this project and associated public meetings. The Cities of Pawtucket and/or Central Falls generally lead the process.

The February 28, 2018 public meeting was advertised by each city, the Pawtucket Foundation, RI Division of Planning, Grow Smart RI, and Pawtucket/Central Falls Development. Flyers were created in English, Spanish, and Portuguese to reflect the primary languages spoken by the project's population. Information was disseminated via email/listserv, online calendar, official websites, social media, and physical posting of the flyers. Additionally, an advertisement was placed in the *Pawtucket Times*.

LANGUAGE ASSISTANCE PLAN

FTA C 4702.1B, Chapter III(4)(a)(5): Requirement to Provide Meaningful Access to LEP Persons

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, RIDOT uses the information obtained in a Four Factor Analysis to determine which specific language services are appropriate. This analysis helps RIDOT to determine if it communicates effectively with LEP stakeholders and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by RIDOT;
 2. The frequency with which LEP individuals come into contact with RIDOT services and programs;
 3. The nature and importance of RIDOT's services and programs in LEP persons lives; and
 4. The resources available to RIDOT for LEP outreach, as well as the costs associated with that outreach.
-

Factor 1 - Number of LEP Persons in Service Area

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter RIDOT's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, RIDOT evaluated the level of English literacy and the extent individuals in the South County Commuter Rail (SCCR) and the Providence-Newport service areas speak a language other than English, and identified those languages. Data for this review is derived from the United States Census Bureau American Community Survey 5-year estimates from 2012-2016. Data was reviewed for the SCCR service area in addition to understanding the demographic composition of the City of Providence in its entirety.

Service Area Overview for MBTA in Rhode Island

The MBTA service area for South County Commuter Rail (SCCR) consists of the cities of Cranston, Newport, Providence, and Warwick; and the towns of Coventry, East Greenwich, Jamestown, Middletown, Narragansett, North Kingstown, South Kingstown, and West Warwick. The service area was refined with data reported in RIDOT's September 2016 survey of commuter rail passengers at Providence, T.F. Green, and Wickford Junction Stations. The top five municipalities that contained the origins of respondents using these stations defined the service area if 1) the municipality generated at least 5% of all trips at one commuter rail station and 2) given that Narragansett Bay splits Providence's southern suburbs into a West Bay (which contains SCCR) and an East Bay, whether or not a municipality reasonably generated commuter rail trips between Providence and Wickford Junction.

This region is home to a diverse population speaking more than thirty-eight languages (or language groups). Of the total service area's population over 5 years of age (509,250), 9.3 percent (47,401) of residents report speaking English less than very well. The most populous language groups other than English are Spanish (78,757, 15.5% of the population), Other Indo-European languages including Portuguese and Italian (16,309, 3.2% of the population), and Other Asian and Pacific Island languages including Japanese and Thai (7,051, 1.4% of the population).

Speaks English "Less Than Very Well" (All Municipalities)

While there are numerous languages spoken at homes in the SCCR service area, there is an outsized Spanish speaking population that reports speaking English "less than very well."

Speaks English "Less Than Very Well"

Population	Number	Percent of Total Population
Spanish	32,439	6.4%
Other Indo-European languages	4,302	0.8%
Other Asian and Pacific Island languages	3,290	0.6%

Providence

As the largest city in the service area, the City of Providence has an estimated population of 167,101 of persons 5 years old and older and contains 32.9percent of the service area's population. Approximately 49.4percent of the City's population reports speaking a language at home other than English. Approximately 37 percent of the total population speaks Spanish at home (a total of 62,282persons) and of that number, 44percent (27,398) report speaking English "less than very well." People who

speak other Indo-European languages at home comprise 3.1% of Providence's population (5,220 people) with nearly one-third (1,636) reporting speaking English "less than very well."

Cranston, East Providence, and the Remaining Cities

As the name implies, South County Commuter Rail begins in Providence and extends south into surrounding cities and towns. While the populations are lower, the same general characteristics (e.g., after English, the next most prevalent language spoken at home being Spanish) exist in MBTA's other member municipalities. The following table summarizes language spoken at home and "less than very well" in municipalities in South County Commuter Rail's service area. As indicated by the 2012-2016 American Community Survey county subdivision data, although the number of Spanish speaking residents is lower in portions of the service area with fewer total residents, it remains the largest population reporting speaking a language at home, other than English, and reporting speaking English "less than very well."

Speaks English "Less Than Very Well"

Municipality	Overall Speak English "Less than Very Well"	Speak Spanish	Speak Spanish While Speaking English "Less than Very Well"
Town of Coventry	1.1%	1.0%	12.5%
Town of East Greenwich	2.2%	1.7%	11.6%
City of Warwick	2.8%	3.4%	31.0%
Town of West Warwick	3.3%	2.6%	27.3%
Town of Jamestown	4.6%	1.1%	17.5%
Town of Middletown	2.7%	2.9%	28.7%
City of Newport	4.1%	8.3%	41.2%
City of Cranston	8.0%	11.2%	31.6%
City of Providence	20.9%	37.2%	44.0%
Town of Narragansett	0.5%	1.6%	27.1%
Town of North Kingstown	1.8%	2.1%	27.0%
Town of South Kingstown	1.0%	2.6%	12.2%

Locations of LEP Populations

The need to provide language services to Spanish speaking populations is more pronounced in the cities that comprise the SCCR service area. However, the towns within the services had in many cases, measurable Spanish speaking populations. Figures 1-2 present the locations of LEP and Spanish-speaking populations.

**FIGURE 1: TOTAL LEP POPULATION IN MBTA
COMMUTER RAIL SERVICE AREA**

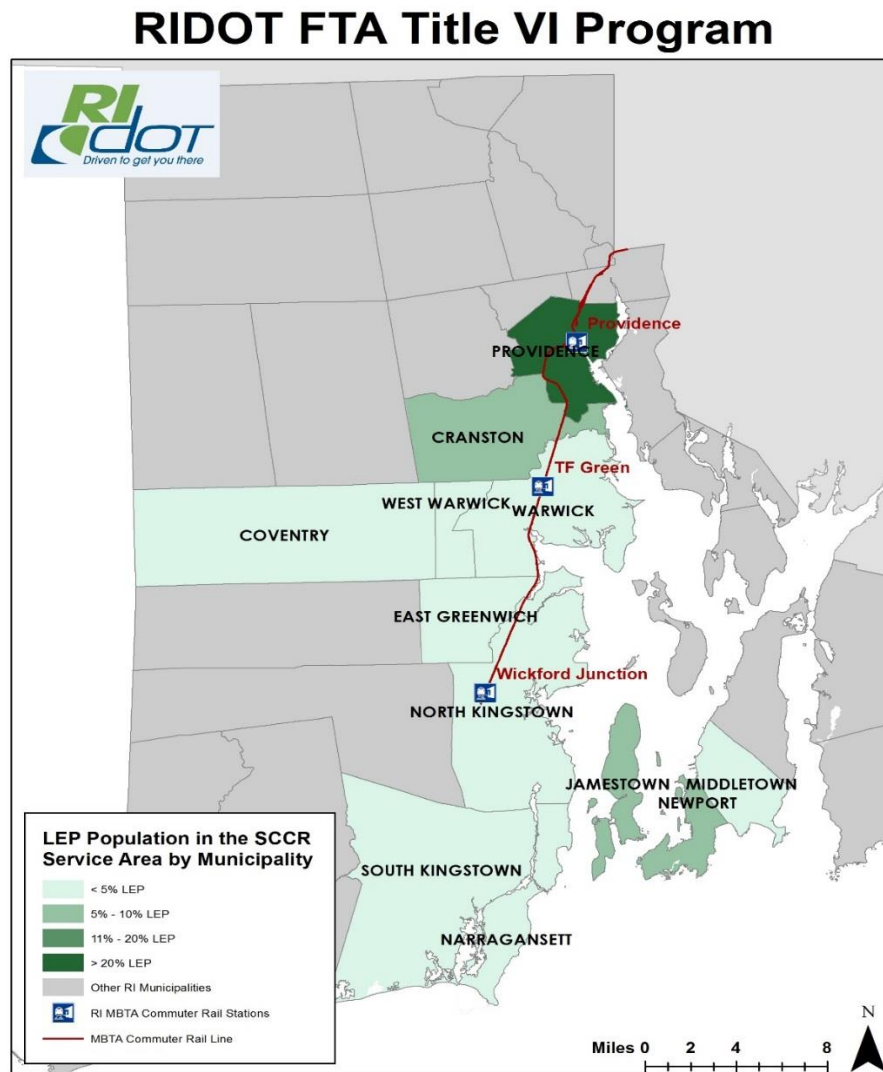
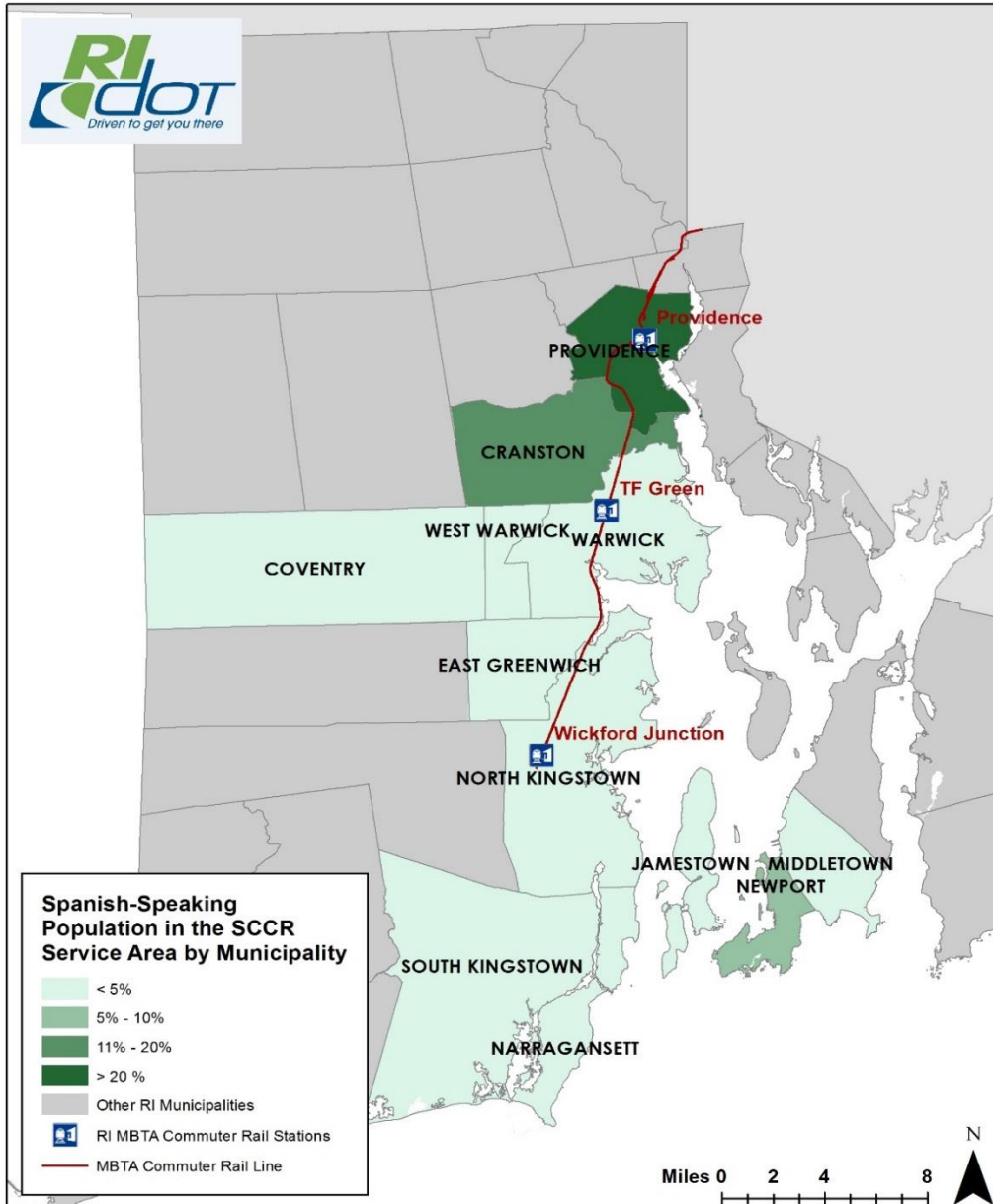


FIGURE 2: TOTAL SPANISH SPEAKING POPULATION IN MBTA
COMMUTER RAIL SERVICE AREA

RIDOT FTA Title VI Program



Service Area Overview for the Providence-Newport Ferry

The National Transit Database (NTD) defines a ferry service area as the half-mile radius around each port. Using this definition, the Providence-Newport Ferry service area comprises neighborhoods in Providence, East Providence, and Newport. As expected for waterfront transit facilities, a sizable portion of each port's service area is water.

The region is home to a diverse population speaking many languages. Of the total service area's population over 5 years of age (41,008), 6.7 percent (2,742) of residents report speaking English less than "very well." The most populous language groups other than English are Spanish (3,763, 9.2% of the population), Other Indo-European languages including Portuguese and Italian (2,454, 6.0% of the population), and Chinese including Mandarin and Cantonese (952, 2.3% of the population).

Speaks English "Less Than Very Well" (All Municipalities)

While there are numerous languages spoken at homes in the Providence-Newport Ferry service area, there is a relatively large Spanish-speaking population that reports speaking English "less than very well."

Speaks English "Less Than Very Well"

Population	Number	Percent of Total Population
Spanish	1,289	3.1%
Other Indo-European languages	689	1.7%
Chinese including Mandarin & Cantonese	396	1.0%

Municipal Analysis of LEP Populations

The service area for the Providence-Newport Ferry's two ports encompasses census tracts in three municipalities. The following table summarizes language spoken at home and "less than very well" in the census tracts of the ferry's service area. As indicated by 2012-2016 American Community Survey data, there are concentrations of LEP and Spanish-speaking residents in some census tracts near India Point in Providence and Newport's Perrotti Park.

Speaks English "Less Than Very Well"

Ferry Port	Municipality	Census Tract	Overall Speak English "Less than Very Well"	Speak Spanish	Speak Spanish While Speaking English "Less than Very Well"
Providence	Providence	6	12.6%	40.2%	26.1%
	Providence	35	2.7%	1.6%	0.0%
	Providence	36.01	5.7%	6.8%	24.0%
	Providence	36.02	3.7%	6.4%	8.0%
	Providence	37	9.0%	9.9%	20.7%
	East Providence	104	14.1%	5.3%	59.7%
Newport	Newport	405	5.8%	17.1%	31.5%
	Newport	406	7.3%	13.4%	49.5%
	Newport	407	5.4%	7.5%	66.0%
	Newport	408	6.6%	6.6%	75.6%
	Newport	410	0.2%	6.6%	0.0%
	Newport	411	1.0%	1.9%	0.0%

Locations of LEP Populations

Many of the census tracts in the Providence-Newport Ferry service area have measurable Spanish-speaking and/or LEP populations. Figures 1-2 present the locations of LEP and Spanish-speaking populations.

FIGURE 3: TOTAL LEP POPULATION IN THE PROVIDENCE-NEWPORT FERRY SERVICE AREA

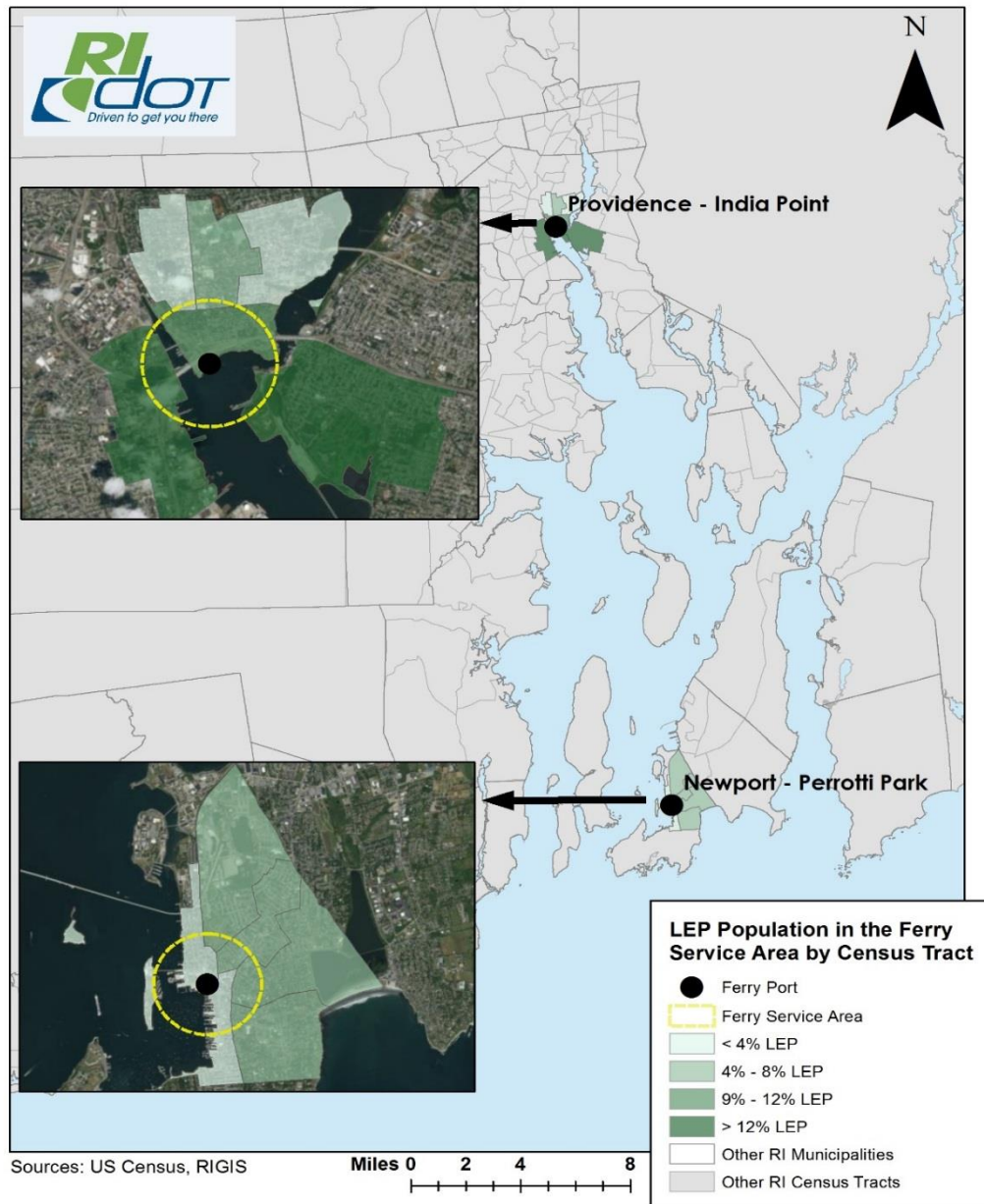
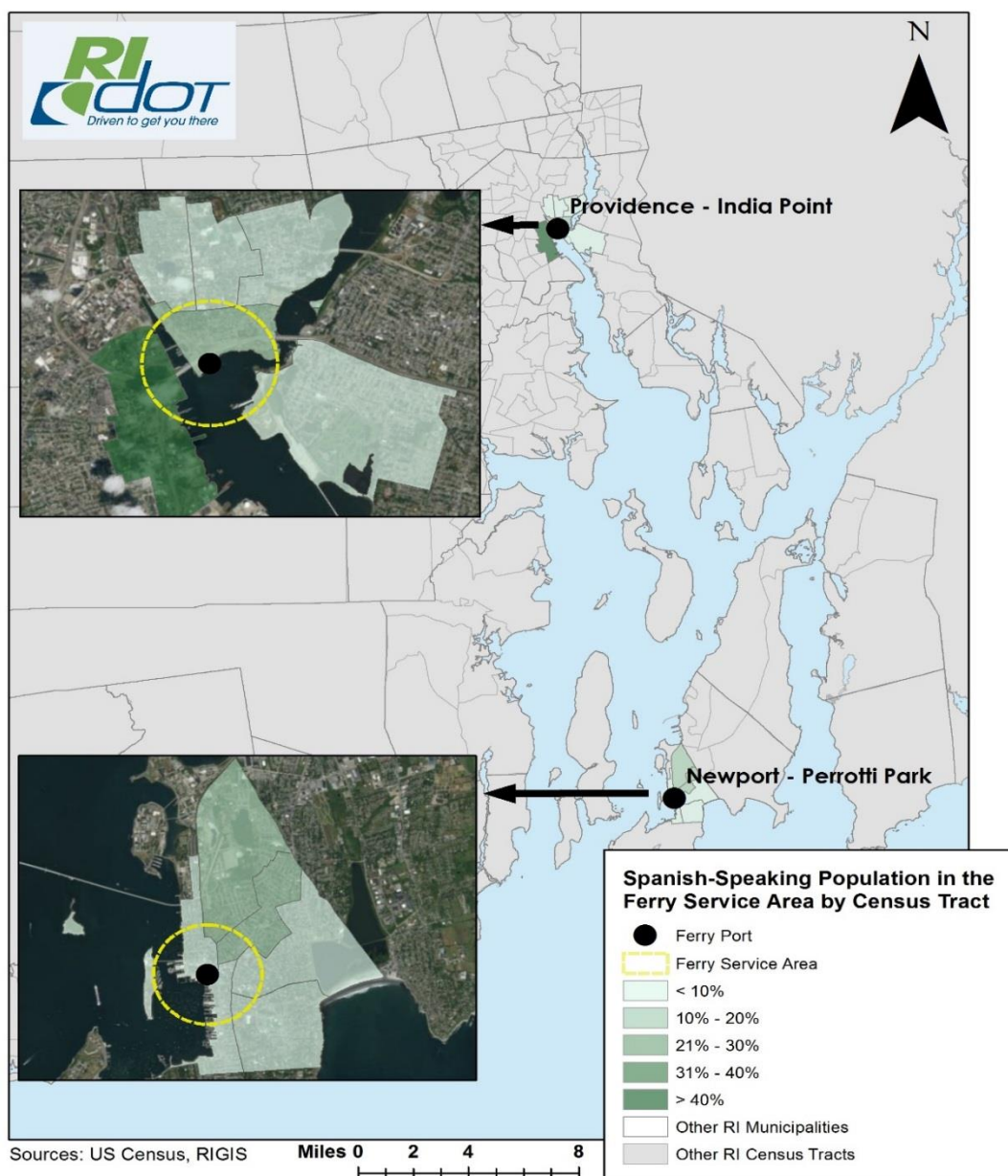


FIGURE 4: TOTAL SPANISH SPEAKING POPULATION IN THE PROVIDENCE-NEWPORT FERRY SERVICE AREA



Factor 2 - Frequency of LEP Use

There are a number of ferry users and LEP persons who come into contact with RIDOT, including calls to customer service representatives and RIDOT's outreach materials.

Points of Contact

An important part of the development of RIDOT's Language Access Plan is the assessment of major points of contact, including:

- The use of the Providence-Newport Ferry (on-board signage, announcements and driver language skills);
 - Communication with RIDOT's and Seastreak's customer service staff;
 - Ticket sales;
 - Printed outreach materials;
 - Web-based outreach materials;
 - Public meetings; and
 - Local news media (print and radio).
-

To better understand the frequency with which LEP users come into contact with SCCR and Providence-Newport Ferry services and RIDOT staff, RIDOT conducted an internal survey of customer service staff regarding interactions with LEP persons. In the April 2018 Employee Survey, 166 employees (or 69% of respondents) indicated how often they interacted with the general public and LEP persons either via phone, written communication, or in person.

RIDOT's Customer Service Office, representing a small subset of the survey respondents that typically answer most telephone inquiries from the general public, reports interacting with LEP customers at least once a year but less than once a month, receiving approximately four telephone calls annually from LEP persons.

Results of Internal Survey Regarding Interactions with LEP Persons

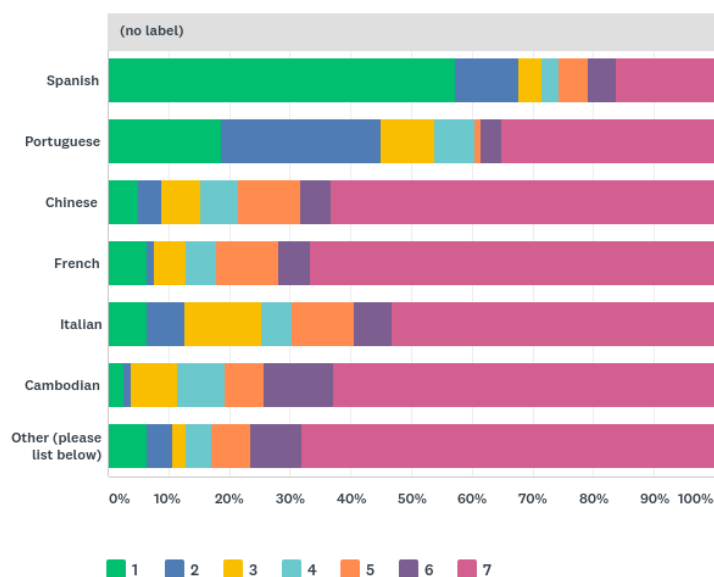
Question: On average, how often do you assist or communicate with persons who have limited English proficiency?

Answer Option	Daily	Weekly	At Least Once a Month	At Least Once a Year	Never	Total Responses*
By telephone	3	7	12	37	101	160
In writing	2	3	5	25	119	154
In person	5	8	20	53	77	163
Answered question						

Results of the April 2018 Employee Survey

The survey also requested information on the non-English languages RIDOT employees encountered during the course of delivering its programs, services and activities. Survey results indicate that while more than half of the survey participants never or hardly ever assist or communicate with LEP persons, the most commonly encountered non-English language groups are Spanish and Portuguese.

Q5 In order of frequency, which language groups do you encounter when communicating with limited English proficient clients? (1 = most frequent; 7 = least frequent)



It should be noted that the survey also revealed that RIDOT receives requests for information about SCCR service only occasionally: overall, individuals contact RIDOT approximately once per month for train schedule information. RIDOT's Customer Service Office reported that the office has never received a call regarding train travel or commuter rail from an LEP individual.

Community Partners

Input solicited from community organizations in response to a survey of community organizations suggests that LEP populations in the SCCR service area may be unaware of SCCR services. However, SCCR does not appear to under serve Rhode Island's LEP population due to language barriers, but rather because LEP populations in the SCCR service area are more likely to need bus service than commuter rail services. Therefore, RIDOT collaborated with the Rhode Island Public Transit Authority (RIPTA) to solicit information pertaining to LEP populations in Rhode Island from the following community-based organizations:

- International Institute of Rhode Island
- Progreso Latino
- Blackstone Valley Community Action Program
- Family Resources Community Action
- Center for Hispanic Policy & Advocacy
- All Saints Parish
- Hispanic American Chamber of Commerce of Rhode Island
- National Association for the Advancement of Colored People, Providence
- Ocean State Independent Living
- Paraplegic Association of Rhode Island

RIPTA conducted outreach to these organizations in the form of a questionnaire designed to obtain information on specific languages spoken by the LEP population, population trends of LEP groups, LEP persons' awareness of the various programs and service offered by RIPTA and RIDOT, transit needs of LEP individuals that are not being met, and to identify of barriers to the use of transit.

Questionnaire Highlights



Factor 3 - The Importance of the Transit Service

The Importance of the SCCR Service

Access to the services provided by RIDOT via the SCCR is an important connection for stakeholders. The lives of many in the region are impacted by transportation options and access to the SCCR as evidenced by the expansion of the service to include two additional commuter rail stations in 2010. Many stakeholders depend on the SCCR service for access to jobs, medical care, educational institutions and entertainment. Because of this, there is a need to ensure that language is not a barrier to access.

If limited English is a barrier to using SCCR services, then the consequences for the individual could limit their access to obtain health care, education or employment. Critical information from RIDOT that can affect access includes:

- Information about the SCCR train timetables;
- Information about how much SCCR trips cost and methods of payment;
- Information on various fare discount programs;
- Route Maps;
- Trip planning information;
- Announcements about safety and security;

- ADA accessibility information;
- Information located on trains and in stations regarding other connecting modes of transportation such as buses and taxi cabs; and
- How to file a service or Title VI complaint.

RIDOT conducted a survey in September 2016 of commuter rail passengers at Providence, T.F. Green, and Wickford Junction Stations. One-hundred percent of respondents boarding at Wickford Junction and T.F. Green Airport said they are “always” able to understand basic directions spoken or written in English, compared with 97.5percent of respondents boarding in Providence. The other 2.5 percent of respondents at Providence Station said they are “often” able to understand basic directions spoken or written in English.

Survey results also indicate that the overwhelming majority of riders (69 percent of Wickford Junction passengers, 96 percent of T.F. Green Airport Station passengers, and 97 percent of Providence passengers) commute to Boston. By contrast, input solicited from community organizations in response to RIPTA’s questionnaire suggests that LEP populations in the SCCR service area are more likely to need access to local bus service than commuter rail service due to the lower cost of bus service and the availability of jobs closer to home.

The Importance of the Providence-Newport Ferry

Access to the services provided by RIDOT via the Providence-Newport Ferry is an important connection for stakeholders. Because of this, there is a need to ensure that language is not a barrier to access.

Critical information from RIDOT that can affect access includes:

- Information about the ferry timetables;
- Information about how much ferry trips cost and methods of payment;
- Information on various fare discounts;
- Route Maps;
- Trip planning information;
- Announcements about safety and security;
- ADA accessibility information;
- Information located at ferry terminals regarding other connecting modes of transportation such as buses and taxi cabs; and
- How to file a service or Title VI complaint.

RIDOT conducted a survey in September 2016 of ferry passengers at the India Point ferry terminal in Providence. Ninety-five percent of respondents said they are “always” able to understand basic directions spoken or written in English. Three percent of respondents said they are “often” able to

understand basic directions spoken or written in English, while 1% responded “sometimes.” The remaining 1% preferred not to say. In addition, 100% of respondents indicated that they prefer to receive information about the ferry in English.

The seasonal schedule of the Providence-Newport Ferry makes it particularly aligned with recreational trips. The price is also high compared with RIPTA’s service between Providence and Newport, which operates the same trip over land for \$2.00, in a similar amount of time, and with a much more robust schedule. Consequently, LEP populations in the ferry service area are more likely to need access to local bus service than seasonal ferry service due to the lower price and more frequent, year-round schedule of the bus.

Factor 4 - Resources and Costs for LEP Outreach

RIDOT has committed resources to improving access to its services and programs for LEP persons. The following resources are currently available to RIDOT to ensure that it can provide language assistance to LEP person participating in its programs and activities:

- RIDOT employees who have identified themselves as willing and able to provide translation or interpreting assistance;
- Translation and interpreting services on the Rhode Island Master Price Agreement (MPA);
- Communication Access Real-time Translation (CART), a service that provides instant translation of the spoken word into English text using a stenotype machine, notebook computer and real time software;
- Language assistance notifications; and
- Free online translation services at www.wordreference.com and translate.google.com.

RIDOT uses bilingual employees to better serve LEP beneficiaries.

Bilingual information (English/Spanish) is also distributed in several mediums including:

- Bilingual English/Spanish outreach materials for projects;
- Bilingual English/Spanish representation at public meetings as appropriate; and

In addition, RIDOT has verified that LEP users of SCCR can contact MBTA's customer service office via a toll-free telephone number that works for calls originating in Rhode Island and provides information in English and Spanish as well as other services as part of MBTA's Language Assistance Plan. RIDOT has also verified that the Providence-Newport Ferry maintain Spanish speaking staff as well as Portuguese speaking staff available. RIDOT is not currently aware of the overall cost of using the resources identified about, because the costs vary depending on the exact language service provided (e.g. on-site interpretation, document translation, over-the-phone interpretation). However, it should be noted that RIDOT is committed to providing services as requested and as they are necessary.

New Tools and Alerting Riders of Language Assistance

Following the "Four Factor Analysis", RIDOT concluded that, while there are language resources and services available to meet the needs of LEP persons as needed expansion of specific service offerings may assist other LEP populations regardless of the total population in the region. These include:

1. Increasing bilingual signage;
2. Identifying RIDOT staff that are fluent in additional languages based upon Factor 1 of the analysis; and
3. Utilizing bilingual emails as appropriate.

Monitoring, Evaluating and Updating the Language Assistance Plan

RIDOT will monitor the strengths and weaknesses of the LEP plan on an ongoing basis using the following strategies:

- Solicit feedback from the LEP community by engaging in dialogue with community based organizations that serve and work with Rhode Island's LEP populations;
- Measure changes in the number and proportion of LEP persons eligible to be served by gathering and analyzing census data, as well as information available from public school districts and community-based organizations that serve LEP populations;
- Measure frequency of contact by LEP persons by periodically surveying RIDOT employees with regard to (1) how often they interact with LEP individuals, and (2) what non-English language(s) employees are encountering during the course of delivering RIDOT's programs, services and activities;
- Conduct surveys of South County Commuter Rail users to collect demographic information and satisfaction with language assistance services;
- Sharing information regarding LEP populations within the SCCR with the MBTA; and
- Sharing information regarding the LEP populations within the Providence-Newport Ferry with Seastreak.

RIDOT will update its language assistance plan as needed.

DECISION-MAKING BODIES

FTA C 4702.1B, Chapter III(4)(a)(6): Minority Representation on Planning and Advisory Bodies

At this time, there are no Planning and Advisory Boards.

MONITORING SUB-RECIPIENTS

FTA C 4702.1B, Chapter III(4)(a)(7): Monitoring Subrecipients

Currently MBTA is RIDOT's only sub-recipient. MBTA is also a direct recipient of FTA funds and reports directly to FTA. Pursuant to Chapter III(12)(b) of FTA Circular 4702.1B, RIDOT is not responsible for monitoring MBTA.

DETERMINATION OF SITE OR LOCATION OF FACILITIES

FTA C 4702.1B, Chapter III(4)(a)(8): Determination of Site or Location of Facilities

RIDOT has not constructed any transit facilities such as storage facilities, maintenance facilities, operations centers, etc. since the last Title VI Program area submission.

SERVICE STANDARDS & POLICIES

FTA C 4702.1B, Chapter III(4)(a)(9) and IV(3)(a)(1)(b): Requirements to Set System-wide Service Standards and Policies

MBTA developed a set of quantifiable service standards and policies in coordination with RIDOT pursuant to the agencies' operating agreement. MBTA updated these standards in January 2017. These service standards and policies include:

- Headways (Frequencies)
- On-time Performance (Schedule Adherence)
- Service Availability
- Distribution of Transit Amenities
- Transit Amenity Policy
- Vehicle Assignment Policy

Because RIDOT operates fewer than 50 trains in peak service, a demographic service profile was not prepared for this plan update.

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle. According to MBTA's Service Delivery Policy, the average maximum load during early morning, midday school and peak operating periods are not to exceed 110 percent of seated capacity.

The MBTA and its commuter rail operator are currently developing a methodology and process for collection of data pertaining to passenger loads on individual commuter rail coaches to allow for better planning and compliance. RIDOT has notified MBTA of the number of seats to be provided based on expected loads and will continue to monitor MBTA's progress in this area.

Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two trains traveling in the same direction on a given route. For the purposes of RIDOT's service this would be defined as trains traveling north/east towards Boston or south/west towards Wickford Junction. MBTA has established the following minimum frequency of service levels for commuter rail service, including SCCR service.

Time Periods	Minimum Frequency
AM peak period	3 trips in peak direction
PM peak period	4 trips in peak direction
All other periods	180-minutes in each direction
Saturday – all day	180-minutes in each direction

On-Time Performance

Among the most important service standard for SCCR users is on-time performance or adherence to published schedule times. MBTA's on-time performance standard for commuter rail measures the percent of trips that depart/arrive within five minutes of scheduled departure/arrival times. Ninety-two percent of MBTA commuter rail trains will depart and arrive at terminals within five minutes of scheduled departure and arrival times.

Service Availability

MBTA's expected span of service for commuter rail is 7:00 AM – 10:00 PM on weekdays and 8:00 AM 6:30 PM on Saturdays. There is no expected span of service on Sundays.

Providence Station and the future Pawtucket/Central Falls Station (est. opening in 2021) are located within areas that include above average concentrations of low-income and minority residents, but the same is not true for the Interlink at T.F. Green Airport or Wickford Junction stations.

Platform Accessibility

MBTA uses the percent of the total platform hours that are accessible as a measure of platform accessibility. All three rail stations in Rhode Island have high-level ADA-compliant platforms. The platforms at T.F. Green Airport and Wickford Junction are accessible without an elevator.

Vehicle Accessibility

MBTA considers a commuter rail trip compliant if at least one ADA-compliant car in the trainset matches the location of each high-level platform at stations served by the trip. ADA-compliant commuter rail coaches must include ADA-compliant restrooms.

Transit Amenity Policy

Provisions of Information

In designing and constructing T.F. Green Airport Station and Wickford Junction Station, RIDOT adopted MBTA standards with respect to variable message signs located above the station platforms. Variable message signs are also available at Providence Station, which is owned and operated by the National Railroad Passenger Corporation (Amtrak).

RIDOT will continue to coordinate with MBTA regarding digital information systems, both for existing stations and any future stations, so that the department maintains consistency in the provision of information throughout SCCR service.

Station Maintenance

RIDOT has the controls in place to ensure that there is proper maintenance of its two SCCR commuter rail stations. With respect to the Interlink at T.F. Green Airport, the department entered into a Project Agreement with the Rhode Island Airport Corporation (RIAC). Under the terms of the Project Agreement, RIAC is responsible for the administration, management, maintenance, regulation and operation of the Interlink, previously known as the Intermodal Facility, while the RIDOT is responsible for capital maintenance, and operation of the train station platform.

RIDOT manages and maintains the Wickford Junction Station building and garage with in-house resources and staff.

As discussed above, Amtrak owns and maintains Providence Station. However, RIDOT pays for SCCR's share of operations and maintenance at Providence Station through the Northeast Corridor Commission's (NECC) cost allocation process. The NECC was established by the Passenger Rail Investment and Improvement Act of 2008. All states, operators, and owners along the Northeast Corridor use the same standardized process to allocate station and right-of-way costs. Separately, RIDOT recently completed a \$7 million pedestrian circulation improvement project around the station.

Vehicle Assignment Policy

Under the Operating Agreement, MBTA is obligated to provide the locomotives and passenger cars for the SCCR service. MBTA's Title VI Report: 2017 discusses MBTA's system-wide vehicle assignment policy with respect to MBTA's commuter rail service.

MBTA determines appropriate vehicle assignments based on specific standards of commuter rail service. These standards include providing a minimum number of seats for each scheduled trip, providing one functioning toilet car in each trainset, maintaining the correct train length to accommodate infrastructure constraints, and providing modified vehicles, when necessary, for a specific operating environment. The MBTA strives to assign its vehicles as equitably as possible within the equipment and operational constraints of the system.

Presently the MBTA commuter rail contract operator is contractually required to have 234 coaches in 39 South Side trains [including trains to Providence and those serving SCCR service]. The following vehicle characteristics must also be considered when assigning vehicles:

Kawasaki Coaches (bilevel) – There is no specific policy restricting the use of bi-level Kawasaki coaches in the commuter rail system. Currently they are used primarily in the South Side commuter rail system, since it carries approximately 65 percent of the total boardings of the system. The bi-level coaches offer substantially more seating than the single-level coaches. This allows Railroad Operations to maintain seating capacity while minimizing the impacts of platform and layover facility constraints. The MBTA intends to purchase only bi-level coaches in future procurements in order to accommodate increasing ridership demands and to allow for greater flexibility when scheduling vehicle assignments

Messerschmitt-Bolkow-Blohm (MBB) Coaches – The MBB fleet is slated to be reduced as the Rotem fleet enters service. Portions of the MBB fleet are in storage.

Rotem Coaches (bi-level) – The delivery and operation of bi-level Rotem coaches began in 2013 and was completed in 2014. There are 75 cars of which 47 are equipped with toilet facilities.

Advanced Civil Speed Enforcement System (ACSES) – All control coaches and locomotives operating on the Providence Line must be equipped with a functioning ACSES system. The Federal Railroad Administration (FRA) mandates the use of ACSES on Amtrak high-speed rail service, which shares the Providence Line corridor with the MBTA. All locomotives have ACSES installed and functioning. The Bombardier control coaches do not yet have ACSES installed; therefore, these coaches are limited to North Side service. There are more locomotives and control coaches equipped with ACSES than are required to meet the daily Providence scheduled trips. This provides for greater flexibility in vehicle assignments.

All coaches in the commuter rail fleet are equipped with similar amenities, the exception being the coaches equipped with toilets; therefore, the primary variation among coaches is age. For the purpose of periodic monitoring, MBTA conducts an assessment of compliance for vehicle assignment is completed each year based on the average age of a trainset for a specified time period.

Monitoring Service Standards

As discussed above, FTA has instructed RIDOT to address the monitoring of MBTA system-wide service standards and policies related to the SCCR service.

RIDOT and MBTA have initiated quarterly meetings to discuss issues related to SCCR service; they will use these meetings to monitor the service standards and policies discussed above and address any issues or concerns that arise.

APPENDIX A



**TITLE VI/NONDISCRIMINATION
COMPLAINT FORM**

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance.

42 U.S.C. § 2000d

Complainant:

Name: _____
Address: _____

Zip Code _____
Telephone No.: (Home) _____ (Cell) _____ (Work) _____

Person(s) discriminated against, if different from above:

Name: _____
Address: _____

Zip Code _____
Telephone No.: (Home) _____ (Cell) _____ (Work) _____

Please describe your relationship to this person(s).

Agency, institution, or organization that discriminated:

Name: _____
Any individual if known: _____
Address: _____

Zip _____
Telephone No.: _____

Does your complaint concern discrimination in the delivery of services or in other discriminatory actions of the agency, institution, or organization? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken:

___ Race: _____

___ Color: _____

___ National Origin: _____

___ Sex: _____

___ Age: _____

___ Disability: _____

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name: _____

Address: _____

_____ Zip _____

Telephone No.: _____

To the best of your recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____

Most recent date of discrimination: _____

Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary.)

If you believe that you have been retaliated against for complaining about discrimination or cooperating in an investigation of alleged discrimination, please explain the circumstances and what actions you took which you believe were the basis for the alleged retaliation.

Please list below any persons (witnesses, fellow employees, supervisors, or others), if known, whom RIDOT may contact for additional information to support or clarify your complaint.

Please provide any other information that you think is relevant to your discrimination complaint.

What remedy are you seeking for the alleged discrimination?

Please sign and date the complaint below. (Please note that RIDOT cannot process the complaint without a signature.)

Signature

Date



COMPLAINANT CONSENT/ RELEASE FORM

Name: _____

Address: _____

Complaint Number(s) (If known): _____

Please read the information below, check the appropriate box, and sign this form.

I am aware that under Section 9-1-28.1 of the Rhode Island General Laws, I have a right to privacy. As a complainant, I understand that in the course of an investigation it may become necessary for the Rhode Island Department of Transportation (RIDOT) to reveal my identity to persons at the organization(s) under investigation, or to refer a copy of my complaint to another investigatory agency. I am also aware of RIDOT's obligations to honor requests under the Access to Public Records Act. I understand that it may be necessary for RIDOT to disclose information, including personally identifying details that RIDOT has gathered as a part of its investigation of my complaint. In addition, I understand that as a complainant I am protected by federal regulations from intimidation or retaliation for having taken action or participated in action to secure rights protected by nondiscrimination statutes.

CONSENT/RELEASE

☐ **CONSENT GIVEN** – I have read and understand the above information and authorize RIDOT to reveal my identity to persons at the organization(s) under investigation, or to refer my complaint to another investigatory agency. I hereby authorize the Rhode Island Department of Transportation (RIDOT) to receive material and information about me pertinent to the investigation of my complaint. This release includes, but is not limited to, personal records and medical records. I understand that the material and information will be used for authorized civil rights compliance activities. I further understand that I am not required to authorize this release, and do so voluntarily.

☐ **CONSENT DENIED** – I have read and understand the above information and do not want RIDOT to reveal my identity to persons at the organization(s) under investigation, or to review, receive copies of, or discuss material and information about me pertinent to the investigation of my complaint. I understand that this is likely to impede the investigation of my complaint and may result in the closure of the investigation.

Signature

Date



TITULO VI/GARANTÍA DE NO DISCRIMINACIÓN FORMULARIO DE QUEJA

Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, debe ser excluida de participar en, negársele beneficios, o ser sometida a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal.

42 U.S.C. § 2000d

Reclamante:

Nombre: _____

Dirección: _____

Código Postal _____

No. Telefónico: (Casa) _____ (Celular) _____ (Trabajo) _____

Persona(s) discriminada(s), si es diferente a la nombrada arriba:

Nombre: _____

Dirección _____

Código Postal _____

No. Telefónico: (Casa) _____ (Celular) _____ (Trabajo) _____

Por favor describa su relación con esta(s) persona(s).

Agencia, institución, u organización que discriminó:

Nombre: _____

Individuo, si es conocido: _____

Dirección _____

Código Postal _____

No. Telefónico: _____

¿Es su queja relacionada con la discriminación en la prestación de servicios u otras acciones discriminatorias de la agencia, institución u organización? Si es así, por favor indique la(s) base(s) en que piense que las acciones discriminatorias tuvieron lugar:

___ Raza/Color: _____

___ Origen Nacional: _____

___ Sexo: _____

___ Edad: _____

___ Discapacidad: _____

Si tiene un abogado representándolo (a) en lo concerniente a esta queja, por favor proporcione lo siguiente:

Nombre: _____

Dirección _____

_____ Código Postal _____

No. Telefónico: _____

Haciendo acopio a su memoria, ¿en qué fecha ocurrió la discriminación alegada?

Fecha más temprana de la discriminación: _____

Fecha más reciente de la discriminación: _____

Por favor explique lo más claro posible lo sucedido, por que cree que sucedió, y como fue que fue discriminado (a). Indique quien estuvo involucrado. Asegúrese de incluir como fue que otras personas fueron tratadas de manera diferente a usted. (Por favor use hojas adicionales si es necesario.)

Si cree que se han tomado represalias contra usted por quejarse de discriminación o colaborar en una investigación sobre una supuesta discriminación, por favor explique las circunstancias a continuación. Asegúrese de explicar las acciones que ocurrieron que, a su juicio son la base de las supuestas represalias.

Por favor enumere a continuación las personas (testigos, compañeros(as) de trabajo, supervisores(as), u otros(as)), si son conocidos(as), a quienes el RIDOT puede contactar para solicitar información adicional para apoyar o clarificar su queja.

Por favor provea cualquier otra información que a su juicio está relacionada con su queja de discriminación.

¿Qué resolución está buscando para la discriminación alegada?

Por favor firme y feche la queja a continuación. (Por favor note que el RIDOT no puede procesar la queja si el formulario no está firmado.)

Firma

Fecha