



## FTA Title VI Program Update



June 2015

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# RIDOT's TRANSIT TITLE VI POLICY & PROCEDURES

The Rhode Island Department of Transportation (RIDOT) will provide safe, efficient and on-time transit service with a focus on customer service that underscores its dedication to diversity, inclusion and fairness. At RIDOT, these core principles and values provide a framework 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's current Title VI Program was approved on June 13, 2013. This Title VI Program update will replace that program upon FTA approval. As a part of RIDOT's ongoing efforts to meet the requirements of FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients, the following policies have been incorporated into the Department's day to day operations:

**Posting of Complaint Procedures** - RIDOT will provide information to the public in a transparent manner. Information on Title VI complaint procedures as well the rights of riders will be prominently posted at Providence, TF Green Airport and Wickford Junction commuter rail stations. Additionally, RIDOT's Title VI Policy, brochure, and complaint procedures will be posted on RIDOT's website and will also be available by request via telephone and in writing;

**Commuter Rail Station Accessibility** - RIDOT will ensure that its transit facilities are located in a manner that are not discriminatory. All three Rhode Island commuter rail stations are accessible. As RIDOT plans for future transportation needs, the location and service needs of Title VI populations will be considered;

**Limited English Proficiency** - RIDOT will address the needs of Limited English Proficiency (LEP) populations. RIDOT will identify the prominent languages spoken by residents within the service area and develop strategies to communicate with LEP persons. RIDOT will translate pertinent signage, documents and offer interpretation services at public events (see Language Assistance Plan, page 26); and

**Capital Projects, Outreach, and Siting** - As RIDOT plans new transit improvement projects, the Department will provide a forum for two-way communication for capital projects. RIDOT will maintain a Public Participation Plan (PPP, see page 8) that is focused on stakeholder outreach and engagement. The plan will include various strategies such as public meetings, small group meetings, traditional and social media. RIDOT will implement elements of the PPP when considering fare changes, expansion of

the transit system or modifications to service schedules and hours of operation. RIDOT will include Title VI analysis as part of the transit planning efforts.

## INTRODUCTION

This update of the Rhode Island Department of Transportation's (RIDOT) Title VI Program has been prepared to ensure that the level and quality of transit service provided by RIDOT is provided in a nondiscriminatory manner. 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. The program provides RIDOT's users and community partners with an opportunity for full and fair participation in efforts to assess existing services and quality, the consideration of new service offerings, potential fare increases and triennial assessments to locate and meet the needs of Title VI populations in the transit service area. More specifically, this update presents a revised Public Participation Plan (PPP) that includes expanded options to reach targeted low-income, minority, Limited English Proficiency (LEP), elderly, disabled, and other traditionally underserved populations. This program update considered the guiding principles noted in Executive Order 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. It also presents an updated LEP assessment, as required.

RIDOT is **committed** to providing **safe, efficient and on-time** commuter rail **service** with a focus on customer service that underscores its dedication to **diversity, inclusion and fairness.**

This program has been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 *Improving Access to Services for Persons with Limited English Proficiency*.

As a recipient of federal funding from the United States Department of Transportation (USDOT), RIDOT is required to manage Title VI programs for the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). This program addresses the requirements of FTA for grant monies received from the agency. The funding that FTA provides to RIDOT's transportation program is vital to successful delivery and operation of the SCCR in addition to other program areas. As such, RIDOT is obligated to ensure that:

- Existing SCCR stations are accessible to all populations throughout the service area;

- The evaluation of new SCCR stations and service provisions are planned in a manner that is equitable;
- The level and quality of SCCR services meet performance standards and accepted best practices of the industry;
- That all persons in the service area are provided information on, and an opportunity to participate in, efforts to engage stakeholders to receive feedback on proposed changes in service and other transportation planning efforts; and
- Maintaining a history of zero complaints of discrimination and delivering a program that provides a transparent process to address both external and internal discrimination complaints.

RIDOT's Director and staff were actively involved in the update of this program. The Director approved the content of the program update on July 22, 2015. This program update contains all of 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 supersedes RIDOT's Title VI Program of 2012 and is effective as of July 22, 2015. It was prepared using data from the 2010 U.S. Census and the 2013 American Community Survey.

## GENERAL REQUIREMENTS

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### Notice to the Public

RIDOT has revised and published a new Title VI brochure since the approval of the 2012 Title VI program. The revised brochure provides an overview on the definition of Title VI, explains RIDOT's commitment to protecting the rights of citizens and outlines the process for filing a Title VI complaint. The brochure is available at RIDOT's offices and on RIDOT's website, and is provided at all RIDOT public meetings. The Title VI brochure is available in both English and Spanish, and can be found on the RIDOT's website at [www.dot.ri.gov](http://www.dot.ri.gov), and at its three commuter rail stations (Providence Station, T.F. Green Airport Station, and Wickford Junction Station). An image of the Title VI brochure is presented on page 4 and sample meeting notices can be found in the PPP section (see Page 27).

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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 they have been unlawfully discriminated against under Title VI may file a complaint with RIDOT. For more information on RIDOT's civil rights program and the procedures to request information on or to file a Title VI complaint, contact 401-222-2481; email [dot.customerservice@dot.ri.gov](mailto:dot.customerservice@dot.ri.gov); or send correspondence to the Office of Civil Rights at:

Rhode Island Department of Transportation  
Two Capitol Hill  
Providence, RI 02903  
ATTN: Title VI Coordinator



**TITLE VI / NONDISCRIMINATION PROGRAM**

**WHAT IS TITLE VI?**

Title VI of the U.S. Civil Rights Act of 1964 is the federal law prohibiting discrimination on the basis of race, color, or national origin in any federally assisted program or activity.

*"No person on 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."* 49 USC § 60102

The Rhode Island Department of Transportation (RIDOT), as a recipient of federal funds, is committed to complying fully with Title VI and related nondiscrimination guidelines. To that end, RIDOT does not - on the basis of race, color, sex, national origin, age, disability, or income status - either directly or by contract:

- Deny any service, aid, or other benefits;
- Provide a service, aid, or benefit that is different than what is provided to others; or
- Segregate individuals or treat individuals separately in any matter related to any service, aid, or other benefits.

RIDOT is also committed to providing meaningful access to persons of limited English-speaking ability.

**IMPLEMENTING TITLE VI**

RIDOT's Office of Civil Rights provides guidance and support to RIDOT employees to ensure meaningful implementation of Title VI principles in the department's daily operations. The office also oversees the department's sub-recipients of federal funds to ensure their compliance with Title VI.

**HOW TO FILE A CLAIM/GET INFORMATION:**

All claims and requests for information should be forwarded to:

Rhode Island Department of Transportation  
Two Capitol Hill  
Providence, RI 02903  
ATTN: Title VI Coordinator  
Tel: 401-222-2481  
Fax: 401-222-2086

All claims should include the following information:

- Your name, address, and telephone number.
- The name and address of the agency, institution, or department you believe discriminated against you.
- How, why, and when you believe you were discriminated against. Include as much specific, detailed information as possible about the alleged acts of discrimination, and any other relevant information.
- The names of any persons, if known, whom RIDOT could contact for clarity of your allegations.

**NONDISCRIMINATION AUTHORITIES**

In addition to Title VI of the Civil Rights Act of 1964, several statutes, laws, regulations and Executive Orders govern RIDOT's Title VI Program, including:

- Civil Rights Restoration Act of 1987
- Federal-Aid Highway Act of 1973
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act of 1990
- Age Discrimination Act of 1975
- Uniform Relocation Act 1970
- Executive Order 12898, Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency



www.dot.ri.gov | @RIDOTNews | www.facebook.com/RIDOTNews

The Office of Civil Rights is open from 8:00 am to 4:00 pm Monday through Friday. For detailed information on the SCCR operated by MBTA and other programs and services, visit [www.dot.ri.gov](http://www.dot.ri.gov). If information is needed in another language, please contact 401-222-2481.

## Discrimination Complaint Procedures

RIDOT has established a process for tracking and investigating Title VI complaints. This process includes a Title VI complaint form and an overview of the necessary information needed to file a complaint under Title VI. Any person who believes that they have been discriminated against on the basis of race, color, or national origin by RIDOT or its SCCR operator MBTA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form available at the Department's Office of Civil Rights or on the website at [www.dot.ri.gov](http://www.dot.ri.gov).

Coordination with MBTA regarding Title VI reporting procedures includes notification about the complaint procedures and requirements. RIDOT has confirmed that MBTA will refer to RIDOT all Title VI complaints that MBTA receives regarding the SCCR service.

**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: \_\_\_\_\_  
 Telephone No.: (Home) \_\_\_\_\_ (Cell) \_\_\_\_\_ (Work) \_\_\_\_\_  
 Zip \_\_\_\_\_

**Person(s) discriminated against, if different from above:**  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_ (Home) \_\_\_\_\_ (Cell) \_\_\_\_\_ (Work) \_\_\_\_\_  
 Zip \_\_\_\_\_

Please describe your relationship to this person(s).  
 \_\_\_\_\_  
 \_\_\_\_\_

**Agency, institution, or organization that discriminated:**  
 Name: \_\_\_\_\_  
 Any individual if known: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_ Zip \_\_\_\_\_

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: \_\_\_\_\_

Page 1 of 3  
 Any complainant requiring technical assistance may contact RIDOT's Title VI Coordinator at (401) 222-3260.

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**If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:**  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_ Zip \_\_\_\_\_

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 below. Be sure to explain what actions you took which you believe were the basis for the alleged retaliation. (Please use additional sheets if necessary.)  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Page 2 of 3  
 Any complainant requiring technical assistance may contact RIDOT's Title VI Coordinator at (401) 222-3260.

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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 be sure to provide contact information, and use additional sheets if necessary.)  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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 \_\_\_\_\_

Page 3 of 3  
 Any complainant requiring technical assistance may contact RIDOT's Title VI Coordinator at (401) 222-3260.

## The Procedure

Civil rights complaints should be filed immediately. However, RIDOT will investigate complaints up to 180 days after the last date of the alleged incident. Complaints may be filed against RIDOT, MBTA or a RIDOT contractor. RIDOT will process complaints that are complete. Once the complaint is received, RIDOT will review it, determine the appropriate process for investigating the complaint in accordance with the RIDOT's *Procedures for Processing and Disposition of Discrimination Complaints* and provide the complainant with a letter of acknowledgement informing them whether the complaint will be investigated by RIDOT. A copy of the Title VI Procedure is available on RIDOT's website and can be requested via telephone, mail or email.

## Active Lawsuits, Complaints or Inquiries Alleging Discrimination

RIDOT has not received any Title VI complaints or conducted any investigations since the filing of its Title VI Program 2012-2015. 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 on the basis of race, color, or national origin in transit-related activities.

## RIDOT'S PUBLIC PARTICIPATION PLAN

Title VI of the Civil Rights Act of 1964 states that "No person in the United States shall, 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."

Subsequent laws and Presidential Executive Orders added disability, sex, age, or income status to the criteria for which discrimination is prohibited. RIDOT has developed this PPP to guide a proactive and inclusive public outreach process in the development and implementation of RIDOT policies, plans and initiatives including the operation of the SCCR.

As a sub-recipient of federal financial assistance, RIDOT is required to comply with Title VI and subsequent nondiscrimination laws, as well as to provide an overview of how RIDOT addresses Executive Orders 12898 and 13166. The purpose of this PPP is to describe the measures taken and planned by RIDOT to assure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws, Environmental Justice, and outreach to 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. The PPP describes the overall goals, guiding principles and outreach methods that RIDOT uses to reach SCCR users and provides a summary of outreach activities since the last program update. A full LEP assessment can be found on page 22.

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. This is a living document. RIDOT will continue to review and refine this PPP on a regular basis for effective communication and outreach efforts.

**RIDOT will be viewed as a responsive, innovative, performance-based steward of Rhode Island's transportation system and add value to all stakeholders.**

## Vision Statement

RIDOT's vision, reflected in the program, responds to current and anticipated future needs. The vision has evolved over many years of involving the public in transportation planning, design and construction.

RIDOT seeks to add value to all stakeholders, to engage in effective outreach for its programs and activities and to consider community opinions and incorporate community feedback whenever feasible.

## Early, Continuous and Meaningful

The targeted outreach tools that have been included in this PPP provide a framework for early, continuous and meaningful opportunities for SCCR users and other interested stakeholders to be involved in the assessment of potential social, economic and environmental impacts associated with the potential Pawtucket Commuter Rail Station as well as other projects that RIDOT may undertake. This PPP is a "living" document and will be updated, as required, to include innovative tools and techniques; incorporate feedback from SCCR users, community partners and other stakeholders; and to address LEP and EJ concerns.

## Key Principles of the Public Participation Plan

In all of 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 advance 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 will implement elements of this PPP when considering fare changes, expansion of the SCCR and modifications to service schedules and hours of operation. RIDOT will also encourage the creation and implementation of a project-specific PPP or Public Involvement Plan (PIP) at the appropriate time (such as during the update of the PIP for the Pawtucket Commuter Rail Station NEPA Study).

## 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.

## OUTREACH STRATEGIES

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

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

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Social Media Advertisements</b></p> <p>Placement of advertisements on Facebook or promoting “Tweets” or “Feeds” through Twitter.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>• Allows for targeting of key audiences</li> <li>• Inexpensive relative to other advertising</li> <li>• Effective for sharing information and growing followers of social media sites</li> </ul>	<ul style="list-style-type: none"> <li>• Limited to Facebook and/or Twitter users</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<p><b>Mobile Devices</b></p> <p>Ensuring that information is easily accessible through mobile devices such as smart phones, tablets and readers.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>• The majority of Americans now access the internet through mobile devices rather than through personal computers.</li> <li>• 86 percent of Americans access the mobile internet through apps.</li> <li>• African-American and Hispanic audiences access social media sites through mobile devices at a higher percentage than other audiences.</li> </ul>	<ul style="list-style-type: none"> <li>• Creation of a mobile app can be expensive and may only be justified on large projects.</li> </ul>	<ul style="list-style-type: none"> <li>• A mobile app, like other information sources, must be marketed making people aware of its existence.</li> </ul>

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

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Point-of-Presence Displays</b></p> <p>Use “pump topper” displays or television monitors to advertise upcoming work that will affect travelers in the area</p>	All	<ul style="list-style-type: none"> <li>• Takes advantage of a “captive audience” waiting for their fuel tank to fill up.</li> <li>• Targets motorists in the area of the planned project.</li> </ul>	<ul style="list-style-type: none"> <li>• The ad space must be purchased and the artwork or videos produced.</li> </ul>	<ul style="list-style-type: none"> <li>• Use the ads to direct people to additional sources of information.</li> </ul>
<p><b>Virtual Public Meetings</b></p>	All	<ul style="list-style-type: none"> <li>• Number of participants could far exceed those attending traditional public meetings.</li> <li>• People can participate on-demand 24 hours per day, seven days per week</li> <li>• African-American and Hispanic populations could be engaged in larger numbers than through traditional public meetings.</li> </ul>	<ul style="list-style-type: none"> <li>• There could be a limit on the number of people able to participate in the live meeting.</li> <li>• The virtual meeting technology could fail.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

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

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Door Hangers/Flyers</b></p> <p>Meeting announcements or informational communication pieces that are delivered to a person's front door.</p>	Low-income	<ul style="list-style-type: none"> <li>Provides more concentrated outreach to an area that could be the source of the largest number of EJ/LEP participants</li> <li>Ensures delivery of information even to people who lease or rent</li> </ul>	<ul style="list-style-type: none"> <li>Door hangers and flyers are subject to weather and wind which can deem them unreadable</li> <li>Loose dogs can be a hazard</li> <li>Crime levels in some neighborhoods can pose safety concerns for staff</li> </ul>	<ul style="list-style-type: none"> <li>Ensure materials are translated into all appropriate languages</li> <li>Ensure staff delivers flyers with a buddy</li> <li>Provide staff with dog treats</li> <li>Ensure staff has charged cell phones during delivery</li> </ul>
<p><b>Incentives for Attending Meetings</b></p> <p>Providing money, prizes, food, or other incentives for attending meetings.</p>	Low-income	<ul style="list-style-type: none"> <li>Encourages increased participation by people who do not traditionally participate in public meetings</li> </ul>	<ul style="list-style-type: none"> <li>Participants may come to expect incentives</li> <li>Incentives add to the cost of holding public meetings</li> </ul>	<ul style="list-style-type: none"> <li>Pick an incentive that is appropriate for your community</li> <li>Gas cards, grocery store gift cards, small appliances and tablets make nice gifts</li> <li>Advertise incentives in all outreach materials</li> </ul>

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

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Childcare at Public Meetings</b></p> <p>Providing childcare at public meetings can help remove an obstacle to participation and can also be viewed as an incentive by some.</p>	<p>Low-income</p>	<ul style="list-style-type: none"> <li>Eliminates a barrier to participation</li> <li>Allows mothers to participate knowing their children are cared for</li> </ul>	<ul style="list-style-type: none"> <li>Can pose liability issues for some organizations</li> <li>Can add to the cost of a meeting or event</li> </ul>	<ul style="list-style-type: none"> <li>Hire a professionally licensed and bonded sitter service</li> <li>Provide activities for children during the meeting</li> <li>If deemed appropriate, ask parents to sign a liability release form</li> </ul>
<p><b>Pulpit Announcements</b></p> <p>Faith based organizations often have multiple opportunities to make announcements and share information with their congregations on a weekly basis.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>Faith based organizations are often aware of community needs</li> <li>Some faith based organizations provide direct assistance to impoverished areas and can help target these populations</li> </ul>	<ul style="list-style-type: none"> <li>Faith based organizations may be skeptical of the motives behind the project</li> <li>While faith based organizations will often distribute information, they may also take a stance either in favor or against a particular project</li> </ul>	<ul style="list-style-type: none"> <li>Be authentic, genuine when requesting their assistance in disseminating information</li> <li>Make sure study objectives are communicated clearly in a non-technical format</li> <li>Provide them with flyers and other tools necessary for distributing information</li> </ul>

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

Outreach Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Publicize through Local and Ethnic/Minority Media Outlets</b></p> <p>Include local and minority media outlets in your media distribution list.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>• Target minorities via radio and television stations favored by this demographic</li> <li>• Allows for disseminating information via additional languages</li> </ul>	<ul style="list-style-type: none"> <li>• Television advertising can be costly</li> <li>• Requires coordination far in advance of meetings or events</li> <li>• May require the identification of spokespeople who can speak other languages</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid using jargon</li> <li>• Translate information into culturally appropriate language, avoid common sayings that may not translate well</li> <li>• Establish relationships with key reporters</li> <li>• Leverage advertising dollars to secure unpaid coverage</li> </ul>
<p><b>Rail Car Placards</b></p> <p>Advertisements found on commuter trains.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>• Visibility with low-income and transit dependent stakeholders</li> <li>• Relatively inexpensive given the reach</li> </ul>	<ul style="list-style-type: none"> <li>• Harder to target specific populations or communities</li> </ul>	<ul style="list-style-type: none"> <li>• Best used for general public information such as advertising the project hotline, website, and public information office</li> </ul>

**Title VI/EJ/LEP Best Practices for Information Dissemination**

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

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

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

### Title VI/EJ/LEP Best Practices for Engagement

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

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Focus Groups</b></p> <p>Small group sessions with 8-12 participants that can be used for testing project messages or collecting input. Structured conversation led by a facilitator.</p>	All	<ul style="list-style-type: none"> <li>Provides an opportunity to test messages prior to launching them in a specific community</li> </ul>	<ul style="list-style-type: none"> <li>Relatively expensive especially if a focus group facility is used</li> <li>Requires some type of incentive to ensure participation</li> </ul>	<ul style="list-style-type: none"> <li>Clearly identify targeted audiences for participation in focus group</li> <li>Hire a professional, third-party facilitator</li> <li>Offer incentives for participation</li> </ul>

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

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Non-Traditional Public Meetings</b></p> <p>Public meetings held at non-typical locations or at non-typical times.</p>	All	<ul style="list-style-type: none"> <li>Makes information accessible and brings it to people in places and times where they are most comfortable</li> </ul>	<ul style="list-style-type: none"> <li>Outdoor meetings are subject to weather events</li> <li>Can be difficult to predict conflicts with the space of time</li> </ul>	<ul style="list-style-type: none"> <li>Work with community leaders to identify the best times and locations for meeting</li> <li>Enlist the help of community leaders in getting the word out and how best to advertise to target audiences</li> </ul>

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Listening Sessions</b></p> <p>A public meeting where the primary objective is to listen to community concerns.</p>	All	<ul style="list-style-type: none"> <li>This is a great way to clear the air and let underserved communities air their grievances prior to the start of a new project</li> </ul>	<ul style="list-style-type: none"> <li>Conversations can get heated and emotional</li> <li>Conversations may have very little to do with the project at hand</li> </ul>	<ul style="list-style-type: none"> <li>Hire a professional facilitator with conflict resolution experience</li> <li>Conduct training with staff to ensure they do not get defensive or argumentative</li> <li>Take notes and address or forward issues as appropriate</li> </ul>

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

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Mobilize Community Ambassadors</b></p> <p>Identify and train community leaders so they can help disseminate information about the project.</p>	All	<ul style="list-style-type: none"> <li>Immediate trust and credibility with community being targeted</li> <li>They can reach and inform people in a completely non-threatening and safe way</li> </ul>	<ul style="list-style-type: none"> <li>May pass on inaccurate information due to limited knowledge</li> <li>May not be able to report back feedback effectively</li> </ul>	<ul style="list-style-type: none"> <li>Provide ambassadors with a log they can use to document who they talked to and any questions or concerns they may have expressed</li> <li>Stay in regular contact with ambassadors and keep them informed of new developments</li> </ul>

Engagement Tool	Audience	What Can Go Right?	What Can Go Wrong?	Tips for Success
<p><b>Informational Workshops</b></p> <p>Educational workshops to educate participants on the general transportation planning process or specific initiatives that may affect their community.</p>	<p>All</p>	<ul style="list-style-type: none"> <li>Helps to build the knowledge basis necessary to effectively participate in the decision-making process</li> </ul>	<ul style="list-style-type: none"> <li>Additional costs related to extra meetings</li> <li>Not everyone in the community will be at the same educational level</li> </ul>	<ul style="list-style-type: none"> <li>Conduct a poll or survey to see what type of information will be most beneficial</li> <li>Conduct the workshops on specific topics in advance of meetings related to those topics</li> </ul>

## 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.

### 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 illegally 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.

## 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. Further, information should be written using 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.

## 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.

## Addressing Comments

All comments received through outreach efforts to support the SCCR and implementation of this PPP will be given careful consideration.

# IDENTIFICATION OF STAKEHOLDERS

## RIDOT's Community Partners

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. Please contact RIDOT for a complete list of community stakeholders.

# SUMMARY OF PUBLIC PARTICIPATION ACTIVITY

Chapter III(4)(a)((4)) requires submission of “[a] public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. The following is a summary of Title VI public outreach activity since the last Title VI Submission in 2012.

The Pawtucket Commuter Rail Station PE/NEPA project has had a comprehensive and inclusive public involvement process. The public outreach activities have been structured to gain meaningful and timely input on the Preliminary Engineering and Environmental Review processes. Outreach activities have been consistent with the *Pawtucket Commuter Rail Station Public Involvement Plan* (April 2013) and have, so far, included three public meetings, two coordination meetings with local design groups, as well as continuous and comprehensive coordination with the Pawtucket Foundation. The Pawtucket Foundation represents local interests and economic goals, and representatives from the City of Pawtucket, City of Central Falls and RIDOT.

The three public meetings were held in an Americans with Disability Act (ADA)-accessible meeting location (the Blackstone Valley Visitor’s Center) on June 13, 2013; May 1, 2014; and January 22, 2015. One more public meeting is anticipated in September 2015 to summarize project development, its findings and next steps for the Pawtucket Commuter Rail Station. RIDOT maintains a checklist for accessible meeting venues as well as translators. The list of meeting venues is available upon request.

You are invited to attend a  
**Rhode Island Department of Transportation  
 & City of Pawtucket/City of Central Falls**

**Public Meeting**

Concerning the  
**Potential Pawtucket/Central Falls  
 Commuter Rail Station**

Being held on  
**Thursday, January 22, 2015**

Taking Place at  
**Blackstone Valley Visitor's Center  
 175 Main Street Pawtucket, Rhode Island  
 Open House: 6:00 PM; Presentation: 6:30 PM**

The Rhode Island Department of Transportation (RIDOT), The City of Pawtucket and the City of Central Falls invite members of the community to attend a meeting to learn more about a potential Pawtucket/Central Falls commuter rail station.

Officials will provide an update on the project and outline next steps for the potential station, which is proposed for the Massachusetts Bay Transportation Authority (MBTA) Providence Line.

The Blackstone Valley Visitor's Center is located at RIPTA's Pawtucket Transit Center and is accessible to persons with disabilities. Spanish translation services will be available at the meeting. Individuals who do not speak the English or Spanish languages or who are hearing impaired may contact RIDOT on or before January 19, 2015 to request an interpreter. Please direct interpreter requests to [customerservice@dot.ri.gov](mailto:customerservice@dot.ri.gov) or (401) 222-2450.

Si esta información es necesaria en otro idioma, llame al (401) 222-2450. Se esta informacao e nevesario emu ma outro lingua, costate por favor (401) 222-2450.

El Departamento de Transporte de Rhode Island & las ciudades de Pawtucket y Central Falls  
 Le Invitan a una

**Sesión Pública**

Para Discutir  
**La Posible Estación de Tren de  
 Pawtucket/Central Falls**

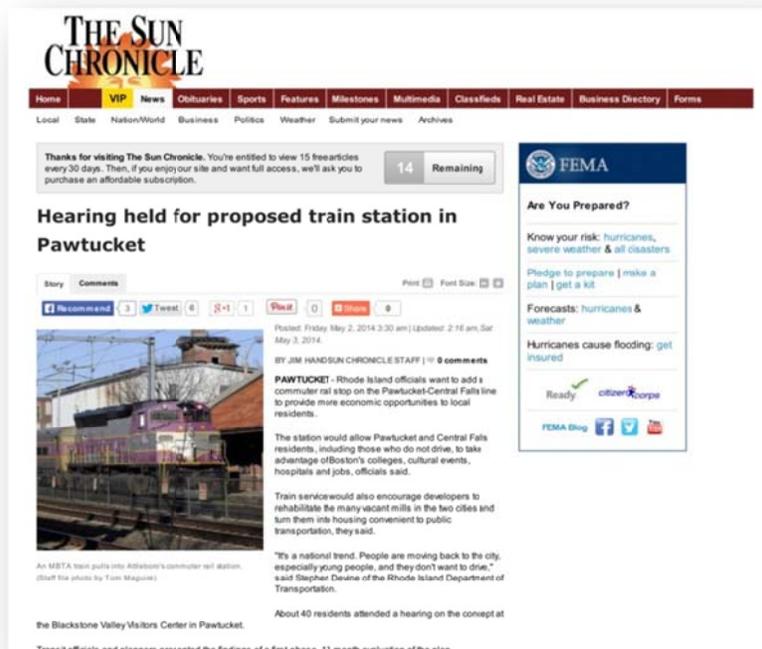
En la fecha de  
**Jueves, 22 de enero del 2015**

Lugar  
**Blackstone Valley Visitor's Center  
 175 Main Street Pawtucket, Rhode Island  
 Exhibición al Público: 6:00 PM; Presentación: 6:30 PM**

El Departamento de Transporte de Rhode Island (RIDOT) y la ciudades de Pawtucket y Central Falls invitan a miembros de la comunidad a una sesión pública, para aprender más sobre el Proyecto de Estación de Tren de Pawtucket/Central Falls.

Oficiales van a proveer información actualizada sobre el proyecto y delinear los próximos pasos para la posible estación, que ha sido propuesta para la Línea de Providence de la Massachusetts Bay Transportation Authority (MBTA).

El Blackstone Valley Visitor's Center se encuentra en el Centro de Tránsito de RIPTA en Pawtucket y es accesible a personas con discapacidades. Servicios de traducción en español estarán disponibles en la reunión. Las personas que no hablan el idioma inglés o español o con problemas de audición pueden comunicarse con RIDOT a más tardar el 9 de enero de 2015, para solicitar un intérprete. Por favor dirija solicitudes de intérprete directamente a [customerservice@dot.ri.gov](mailto:customerservice@dot.ri.gov) o al (401) 222-2450.



Based on findings from a review of U.S. Census data, meeting flyers for these public meetings were produced in English and in Spanish and were distributed to the communities by an outreach effort that included the RIDOT, the City of Pawtucket, the Pawtucket Foundation, the City of Central Falls and Progreso Latino. RIDOT sent out press releases to local media outlets and posted the meeting flyer on its website, the cities of Pawtucket and Central Falls, and the Pawtucket Foundation helped distribute meeting flyers to their prospective communities and Progreso Latino helped notify their membership through the distribution of flyers.

Language interpreters were also present at the three public meetings, providing translation services for those who speak Spanish. The interpreters were provided by the Progreso Latino Organization, located in Central Falls, RI. Each public meeting educated and informed the general public and stakeholders, seeking a broad and diverse range of perspectives in order to respond to public comments. The project incorporated design modifications to address public comments, where appropriate.

In addition to the public meetings, two coordination meetings were held with local design groups: one on December 18, 2014 and one on March 5, 2015. The purpose of these meetings was to get input from local design groups on the design of the pedestrian bridge for the project. Lastly, the project team has continuously and comprehensively involved the Pawtucket Foundation throughout the public involvement process. The project team has met monthly with the Pawtucket Foundation in order to ensure local interests and economic goals are well represented in project design and development.

# LANGUAGE ASSISTANCE PLAN

## Improving Access for People with Limited English Proficiency

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.

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**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 its service area 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 forecast from 2013. 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 in Rhode Island consists of the cities of Cranston, East Providence, Pawtucket Providence, and Warwick; and the towns of Barrington, Bristol, East Greenwich, Johnston, Narragansett, North Providence, North Kingstown, Richmond, South Kingstown, and West Warwick. The region is home to a diverse population speaking more than thirty-eight languages (or language groups). Of the total service area’s population (645,080), 10.7 percent (69,212) residents report speaking English less than very well. The most populous language groups in the category are shown below. Of the remaining populations, those reporting speaking English “less than very well” range from 0 percent to 0.3 percent of the total Population.

### Speaks English “Less Than Very Well” (City/Town)

The following data reveals that at the city/town level, while there are numerous languages spoken at home, there is a large Spanish speaking population which reports speaking English “less than very well.”

#### Speaks English “Less Than Very Well”

Population	Number	Percent of Total Population
Spanish or Spanish Creole	40,813	6.3%
Portuguese or Portuguese Creole	10,661	1.7%
Chinese	2,627	0.4%

## 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 25.9 percent of the service area’s population. A total of 48.7 percent of the population reports speaking a language other than English. As suggested by the city/town data, 36 percent of the total population speaks Spanish or Spanish Creole (a total of 60,239 persons) and of that number, 18.1 percent (30,178) report speaking English “less than very well.” Spanish or Spanish Creole speaking residents are residents speaking the Mon-Khmer/Cambodian languages (2,957) or 1.8 percent, with over half (1,576) reporting speaking English “less than very well.”

## Cranston, East Providence, and the Remaining Cities

Much of MBTA’s services extend well beyond the City of Providence into the 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 or Spanish Creole) exist in MBTA’s other member municipalities. The following table summarizes language spoken at home and “less than very well” in MBTA’s other member municipalities. As indicated by the current city/town data, there are high percentages of Spanish or Spanish Creole speaking residents in the MBTA service area. Although the number of Spanish or Spanish Creole 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"	Speaks Spanish or Spanish Creole	Speaks Spanish or Spanish Creole "Less than Very Well"
City of Cranston	7.2%	9.9%	3.5%
City of East Providence	10.2%	3.1%	1.1%
City of Pawtucket	17.0%	16.6%	7.1%
City of Providence	23.2%	36.0%	18.1%
City of Warwick	3.2%	3.5%	1.1%
Town of Barrington	1.8%	1.6%	0.5%
Town of Bristol	6.2%	0.8%	0.2%
Town of East Greenwich	1.0%	1.0%	0.2%
Town of Johnston	4.3%	4.2%	0.7%
Town of Narragansett	0.8%	1.2%	0.3%
Town of North Providence	5.0%	4.9%	2.5%
Town of North Kingstown	2.1%	2.2%	0.6%
Town of Richmond	0.3%	1.0%	0.0%
Town of South Kingstown	1.2%	2.5%	0.2%
Town of West Warwick	4.6%	3.5%	2.0%

## 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

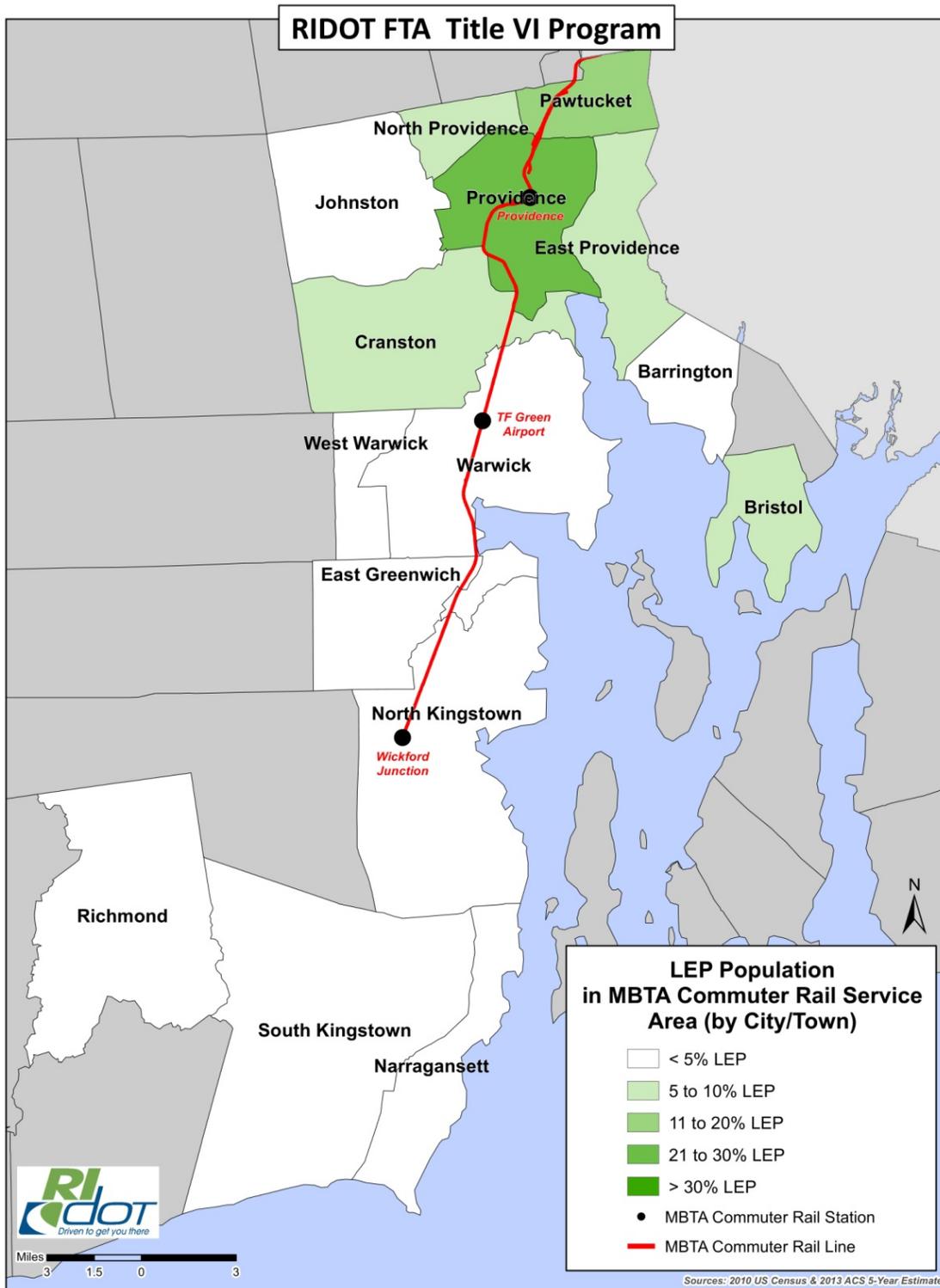


FIGURE 2: TOTAL SPANISH SPEAKING POPULATION IN MBTA COMMUTER RAIL SERVICE AREA



## Factor 2 - Frequency of LEP Use

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

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### 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 SCCR commuter rail service (on-board signage, announcements and driver language skills)
  - Communication with RIDOT's and MBTA's customer service staff;
  - Rail pass sales
  - Printed outreach materials
  - Web-based outreach materials
  - Public meetings, and
  - Local news media (print and radio)
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To better understand the frequency with which LEP users come into contact with SCCR services and RIDOT staff, RIDOT conducted an internal survey of customer service staff regarding interactions with LEP persons. In that June 2011 Employee Survey, 159 employees indicated how often they interacted with 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 receiving approximately four telephone calls annually from LEP persons.

The survey also requested information on the non-English languages RIDOT employees encountered during the course of the delivering its programs, services and activities. Survey results indicate that while more than half of the survey participants never assist or communicate with LEP persons, the most commonly encountered non-English language groups are Spanish and Portuguese. These results are consistent with the data presented under Factor 1, concerning the most prominent non-English language spoken by LEP populations in the SCCR service area.

**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	Monthly	Occasionally	Never	# Responses
By telephone	2	7	4	45	101	159
Via written communication	1	2	2	15	139	159
In person	6	7	6	53	87	159
Please specify how many times per day/week/month, or what you consider to be "occasionally"						71
Answered question						159

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 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 which 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 Passenger Survey in June of 2012 to evaluate commuter rail service for persons utilizing commuter rail to travel to and from Rhode Island using Wickford Junction Station, T.F. Green Station and Providence Station. One-hundred percent of riders boarding at Wickford Junction identified English as their primary language, compared with 95 percent of passengers boarding at T.F. Green Station and 93 percent of passengers boarding in Providence.

Survey results also indicate that the overwhelming majority of riders (70 percent of Wickford Junction passengers, 90 percent of T.F. Green Airport passengers, and 79 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.

## 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 training courses;
- "I Speak" cards to identify the language spoken by a beneficiary;
- Language assistance notifications; and
- Free online translation services at [www.wordreference.com](http://www.wordreference.com) and [translate.google.com](http://translate.google.com).

RIDOT uses "I Speak" cards and 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
- Bilingual English/Spanish customer service representatives if needed.

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 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.

## OUTCOMES

### 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.

## OVERSIGHT

### 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; and
- Sharing information regarding LEP populations within the SCCR with the MBTA.

RIDOT will modify its language assistance plan as needed.

### Decision-Making Bodies

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

### Monitoring Sub-Recipients

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.

## SERVICE STANDARDS and POLICIES

MBTA has developed a set of quantifiable service standards and policies in coordination with RIDOT pursuant to the agencies operating agreement. These service standards were updated in 2012 through the FTA Title VI program review process. These service standards and policies include:

- Vehicle Load
- 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 should not exceed 110 percent of seated capacity. The following table applies the maximum load factor to the possible commuter rail coaches used for SCCR service.

**Maximum Load Factor**

Coach Type	No. Seats	Standing	Total	Max. Load Factor
Pullman	114	11	125	1.1
Messerschmitt-Bolkow-Blohm	94	9	103	1.1
Messerschmitt-Bolkow-Blohm	96	9	105	1.1
Bombadier-A	127	12	139	1.1
Bombadier-B	122	12	134	1.1
Bombadier-C	122	12	134	1.1
Kawasaki	185	18	203	1.1
Kawasaki	175	17	192	1.1
Kawasaki	182	18	200	1.1
Kawasaki	180	18	198	1.1
Hyundai Rotem	179	18	197	1.1
Hyundai Rotem	179	18	197	1.1

The average maximum load during non-peak operating periods should not exceed 100 percent of seated capacity. The following table applies the maximum load factor to the possible commuter rail coaches used for SCCR service.

**Maximum Load Factor**

Coach Type	No. Seats	Standing	Total	Max. Load Factor
Pullman	114	0	114	1.0
Messerschmitt-Bolkow-Blohm	94	0	94	1.0
Messerschmitt-Bolkow-Blohm	96	0	96	1.0
Bombadier-A	127	0	127	1.0
Bombadier-B	122	0	122	1.0
Bombadier-C	122	0	122	1.0
Kawasaki	185	0	185	1.0
Kawasaki	175	0	175	1.0
Kawasaki	182	0	182	1.0
Kawasaki	180	0	180	1.0
Hyundai Rotem	179	0	179	1.0
Hyundai Rotem	179	0	179	1.0

## Vehicle Headway (Frequency)

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

Time Periods	Minimum Frequency
AM and PM peak periods	3 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-five percent of MBTA commuter rail trains will depart and arrive at terminals within five minutes of scheduled departure and arrival times.

## Service Availability

RIDOT locates SCCR stations along the Northeast Rail Corridor so that approximately 50 percent of all residents of the State of Rhode Island are within a 20-minute drive to a commuter rail station.

The Providence Station is located within an area that includes 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. However, RIDOT is conducting preliminary engineering and environmental reviews necessary to develop a proposed commuter rail station in Pawtucket, a location north of Providence that would service high concentrations of low-income and minority persons.

## 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

To ensure proper maintenance of the commuter rail stations that the department constructed within the last several years, RIDOT has entered into third-party agreements. 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.

Similarly, with respect to Wickford Junction, RIDOT has entered into an Operations and Maintenance Agreement with a third party that manages and maintains Wickford Junction Station and platform.

As discussed above, Amtrak owns and maintains Providence Station. However, RIDOT pays an access fee to Amtrak for station operation and maintenance, and it is undertaking a \$6-7 million project for site and pedestrian improvements to Providence 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: 2011 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 213 coaches in 33 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 these vehicles in the commuter rail system. Currently they are used exclusively in the South Side commuter rail system, since it carries approximately 65 percent of the total boardings of the system. The bilevel coaches offer substantially more seating than the single-level coaches. This allows MBTA Railroad Operations to maintain consist seating capacity while minimizing the impacts of platform and layover facility constraints. The MBTA intends to purchase only bilevel 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** – Every train consist has at least one MBB coach 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. ACSES is a Federal Railroad Administration (FRA)-mandated requirement. All locomotives except the GP40 series have ACSES installed and functioning. The GP40 locomotives have ACSES installed but have not yet been qualified to use it. The Bombardier control coaches do not yet have ACSES installed, and therefore are limited to North Side service [north and east from North Station in Boston, Massachusetts]. There are more locomotives and control coaches equipped with ACSES than are required to meet the daily Providence Station 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 MBB coaches, which are equipped with toilets; therefore, the primary variation among coaches is age. For the purpose of periodic monitoring, an assessment of compliance for vehicle assignment is completed each year based on the average age of a trainset for a specified time period.

In addition to the information provided in the 2011 Title VI program, the MBTA has recently purchased 75 new Hyundai-Rotem bilevel coaches that, according to an MBTA press release, features 55 percent

more seating than single-level coaches; onboard LED displays showing next station information and announcements larger, modern, accessible restrooms; designated seating for passengers with disabilities; specially designed air-conditioning systems providing comfortable cool air with increased filtration and airflow, and new microprocessor systems controlling air conditioning, doors, communications, brakes and signals.

## 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.