



Title VI



2024 Goals and 2023 Accomplishments Report Rhode Island Department of Transportation

Submitted by: The Office of Civil Rights

December 2023

Contents

I.	INTRODUCTION	3
II.	PROGRAM AREA REVIEWS	4
	2023 ACCOMPLISHMENTS	4
	2024 GOALS.....	8
III.	SUBRECIPIENT REVIEWS	9
	2023 ACCOMPLISHMENTS	9
	2024 GOALS.....	10
IV.	TRAINING AND TECHNICAL ASSISTANCE	11
	2023 ACCOMPLISHMENTS	11
	2024 GOALS.....	14
V.	COMPLAINT PROCEDURE & CORRECTIVE ACTIONS	15
	2023 COMPLAINTS.....	15
	2024 GOALS	5
	2023 CORRECTIVE ACTIONS.....	15
	2024 GOALS.....	15

I. INTRODUCTION

Pursuant to 23 CFR 200.9, State Transportation Agencies are to submit a Goals and Accomplishments (G&A) Report to Federal Highway Administration (FHWA) outlining the Title VI accomplishments for the past year and goals for the upcoming year. [Per FHWA's Guidance](#), the G&A Report is to be used to monitor progress and does not require approval by FHWA. [Per the 2015 Stewardship and Oversight Agreement](#) by and between FHWA and RIDOT, the G&A Report is to be submitted by December 1st. [Per FHWA's G&A Report Guidance](#), the report is to be submitted separately from the Title VI Implementation Plan and is to cover activities that were carried out with respect to internal and external reviews, training, and processing of Title VI complaints and corrective actions. More specifically, the G&A Report shall contain:

1. Program Area Reviews
 - Accomplishments: number of reviews, results, and actions taken
 - Goals: number of reviews planned for the next year
2. Subrecipient Reviews
 - Accomplishments: number of reviews, results, and actions taken
 - Goals: number of reviews planned for the next year
3. Training
 - Accomplishments: number of trainings, topics covered, attendees, audience, and follow up
 - Goals: number and description of training sessions planned (both internal and external)
4. Title VI Complaints
 - Summary and status of complaints received and forwarded to FHWA
5. Corrective Actions Plans
 - Detailed report of ongoing or completed CAP activities.

Pursuant to 23 CFR 200.9 (b)(10), the Rhode Island Department of Transportation (RIDOT) submits this G&A report for FHWA review. Questions and comments should be directed to:

Solight Sou
Chief, Program Development
Title VI Coordinator
Office of Civil Rights
RI Department of Transportation
Two Capitol Hill
Providence, RI 02903
Phone: 401-563-4498
Email: DOT.TitleVI@dot.ri.gov

I. PROGRAM AREA REVIEWS

23 CFR 200.9 (a)(4); (b)(5), (6), & (13)

2023 ACCOMPLISHMENTS

- In FFY 2021, RIDOT was selected for a Title VI Process review by the FHWA Rhode Island Division. The review was conducted in FFY 2022. It consisted of the state’s fatal crashes over a five-year period from 2016-2020 with data obtained from RIDOT and the National Highway Traffic Safety Administration’s (NHTSA) Fatal Analysis Reporting System Fatal Analysis Reporting System (FARS). The review and data analysis of the distribution of fatal accidents in Rhode Island was used to determine if there are any demographic disparities with regard to race, color, or national origin of the persons. A risk ratio was utilized to determine if there are negative impacts to any demographic groups.

The FHWA Rhode Island Division recommended that RIDOT’s Office of Safety continue to collect demographic data so that RIDOT may view the data through a Title VI lens to support future decision-making in regard to the selection of projects and programs, and also as an opportunity to mitigate and address potential disparities. RIDOT was instructed to develop an Action Plan detailing how the Department would address the identified recommendations.

On October 29, 2022, RIDOT’s Office of Civil Rights strengthened interdepartmental collaboration with the Office of Legal Counsel and Office of Highway Safety and submitted a response to FHWA. The response included the Department’s Action Plan and was approved by FHWA in December 2022. RIDOT’s strategies to identify, mitigate, and address potential disparities are outlined in the Action Plan below:

	ACTION STEP	PERSON(S) RESPONSIBLE	TIMELINE: START/END	DESIRED OUTCOME
1)	OCR will attend quarterly Fatal Review meetings to review data	Title VI Coordinator	Quarterly: Beginning 12/14/2022	100% OCR attendance at meetings
2)	OCR will submit Fatal Review meeting notes and quarterly data to FHWA	Title VI Coordinator	Quarterly: Beginning January 2023	FHWA is updated on RIDOT progress
	ACTION STEP	PERSON(S) RESPONSIBLE	TIMELINE: START/END	DESIRED OUTCOME
3)	OCR will collaborate with OHS and Consultant VHB on HSP submissions	Title VI Coordinator	Annually: Beginning July 2023	Incorporation of Title VI analysis in annual HSP

4)	RIDOT will provide appropriate printed and/or digital educational materials to community organizations serving potentially disparately-impacted groups	OHS	Beginning January 2023	3 organizations increase accessibility, outreach, and education through printed and web-based materials
5)	RIDOT will identify opportunities to introduce highway safety trainings and/or initiatives targeting potentially disparately-impacted groups	OHS	Annually: Beginning January 2023	RIDOT will fund 1 prevention safety initiative and/or training in FFY 23

- As included in the Action Plan, the Title VI Coordinator and the OCR Administrator have been added to standing meetings that review motor vehicle fatalities. This has provided opportunities for RIDOT to analyze the available demographic data of fatalities for potential disparities on a quarterly basis.
- In addition to ongoing demographic analysis, the Department released the [State of Rhode Island Highway Safety Plan Annual Grant Application for FFY 2024](#) in August 2023 with the inclusion of the latest Census Data and mention of collaboration with OCR to regularly review demographic data to support decision-making in the selection of safety projects and programs.
- For FFY 2023, the Title VI Coordinator conducted one (1) program review. The selected program area was the Office of Highway Safety (OHS). The review consisted of interviews with area personnel, followed by random samplings of programs and projects to assess and review adherence to procedures, and concluded with findings and recommendations from the Title VI Coordinator.
- During the interview phase, the OCR Administrator and Title VI Coordinator met with OHS. OHS is committed to the identical mission and goal of the 1966 Highway Safety Act that serves to support the strength and protection of *all* communities. OHS applies a Safe Systems Approach that embraces five complementary and cultural drive elements:
 - Safer People.
 - Safer Roads.
 - Safer Vehicles.
 - Safer Speeds.
 - Post-Crash Care.

OHS values the power of community partnerships and relies on stakeholder input and collaboration to foster a strong safety culture. OHS also works closely with stakeholders to provide funding to non-profits and maintains a presence among traditionally underserved and/or environmental justice populations. OHS staffs Program Managers who engage in direct outreach with stakeholders and the office convenes with external stakeholders annually in February in preparation for its grant planning process. During OHS’ Annual Stakeholders Meeting, planning and listening sessions are conducted to review crash trends and emerging issues with stakeholders, gather input on safety problems, and

discuss effective countermeasures being implemented by other agencies. Stakeholders are encouraged to submit proposals in alignment with the prioritization of safety programs based on trends and needs. Each applicant must outline the project information, the program's educational impact, and the program's measurable progress. Once a grantee is awarded funding, ongoing monitoring and evaluation from OHS is accomplished through the grantee's required reports and progress on deliverables.

OHS is also actively involved in the work of the RI Traffic Safety Coalition and attends up to four (4) meeting sessions annually. At these sessions, OHS has the opportunity to listen to a diverse group of people committed to traffic safety throughout the state and gains insight into how RIDOT can offer support in an efficient and effective manner to coalition members, including but not limited to professionals from the transportation industry, RI State Police, municipal law enforcement officers, pedestrian and bicycling advocates, representatives from FHWA, substance abuse prevention and treatment specialists, hospital personnel, NHTSA, the Attorney General's Office, the RI Police Chiefs' Association, Insurance Company executives, members of the RI Hospitality Association and RI Motorcycle Association.

OHS analyzes NHTSA, FARS, and U.S. Census data to inform safety efforts and selected programs as strong countermeasures to the crashes tracked throughout the state. Furthermore, OHS relies on data obtained from the aforementioned stakeholders and also on RIDOT data for serious injuries, FHWA for vehicle miles traveled, Rhode Island Department of Motor Vehicles (RI DMV), RI Emergency Medical Services (RI EMS), RI Department of Health (RI DOH), RI Courts, OSCAR (Crash Reports), Alcohol Survey, Seatbelt Survey, RI Hospital Trauma Data, and the Center for Disease Control's Youth Risk Behavior Survey (YRBS).

- During the desk assessment phase, the Title VI Coordinator reviewed the list of external stakeholders comprised of agencies, organizations, and populations served. The Title VI Coordinator also reviewed the contractual obligations of the State-Approved Media Vendor through the State of Rhode Island's Master Price Agreement (MPA) to produce media materials in both English and Spanish with the venues chosen based on market data for each audience.
- During the field assessment phase, the Title VI Coordinator randomly selected two (2) projects funded by OHS to confirm the U.S. DOT Standard Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A had been signed by the agencies' CEOs. By signing the Title VI Assurance, the funded agency expresses understanding of the non-discrimination requirements and its obligations to adhere to Title VI requirements. The Title VI Coordinator also reviewed randomly two (randomly) selected media campaigns to assess if the communications projects were disseminating information meaningfully to EJ and LEP populations, if applicable, and based upon the criteria set out in Section 401 Advertising Space Guidance, and the additional requirements within the Grant Funding Policy Part II E that ensures all television advertisements include closed captioning for the hearing impaired.
- During the findings and recommendations phase, the Office of Highway Safety completed the required Title VI training and did not receive any Title VI complaints in FFY23. No recommendations were required at this time as the current process is most effective. The Title VI Coordinator will continue to offer ongoing technical support as needed and OHS will continue to strengthen collaboration with OCR.
- The Title VI Coordinator, utilizing a survey, gathered information from internal RIDOT divisions regarding Limited English Proficiency (LEP) accessibility. The survey included questions specific to the 2023 Title VI-related goals, division's interaction with various LEP populations, the use of interpreters, the ability of our staff to provide interpretation and translation services, and other related information.

The survey was completed by 201 employees from the following RIDOT divisions: Bridge Engineering, Civil Rights, Communications, Contract Administrations, Construction and Maintenance, DoIT, Finals and Compliance, Financial

Management, Highway and Bridge Maintenance, Human Resources/Payroll, Legal Services, Office of the Director, Project Management, Planning, Real Estate, Safety, Stormwater Management and Transit.

The survey enables the Department to annual update its list of bilingual or multilingual employees that could be of assistance for translations and/or interpretations as needed.

2024 GOALS

- The Title VI Coordinator will propose a review of the Planning Division to evaluate related policies and procedures, identify written standard operating procedures and/or unwritten practices; and determine what tools/resources are used by the division to collect demographic and socio-economic data. Additionally, the review will assess methodologies used to evaluate equitable distribution of burdens and benefits; assess division personnel's adherence to operating procedures through random sampling of projects; analyze data for trends and patterns of discrimination and/or disparate impact; and assess methodology used to measure efficacy and efficiency of the tools and methods used to monitor compliance with Title VI.

Some of the following procedures will be reviewed:

- Procedure to equitably allocate federal transportation funding;
- Procedure to equitably prioritize transportation projects;
- Procedure to equitably distribute projects;
- Procedure to collect and analyze demographic and socio-economic data of participants and beneficiaries of transportation projects, services, and activities;
- Procedure or methodology to conduct benefits-burden analysis;
- Procedure to analyze demographic and socio-economic data of populations within a project area and readily identify the presence of traditionally underserved and/or environmental justice populations;
- Procedure to verify that environmental justice analysis is included in RFP, draft, and final EIS/EAs;
- Procedure to identify projects with potential to result in disparate impact;
- Procedure to refer Title VI complaints and public concerns promptly to the Title VI Coordinator and assist, when applicable, with the investigation and resolution of these complaints and public concerns;
- Procedure to periodically monitor staff adherence to its operating procedures, analyze the effects resulted from its procedures, and take immediate corrective action to eliminate procedures responsible for, or with the potential to, result in discriminatory effect and disparate impact;
- Procedure to document systemic and individual barriers for equity and disparate impact;
- Procedure to evaluate past issues and best practices to increase Planning's compliance with Title VI;
- Procedures within RIDOT's Public Participation Plan.

II. SUBRECIPIENT REVIEWS

23 CFR 200.9 (b)(7)

2023 ACCOMPLISHMENTS

- During FFY 2023 a Title VI Information Packet that included Title VI requirements for Subrecipients of Federal-Aid Highway Assistance was sent to all Subrecipients. The packet included Title VI essentials, the history of Title VI, the prohibited types of discrimination under Title VI and data collection information.

- The Title VI Coordinator updated the current Title VI Assessment Tool in Microsoft Forms and disseminated the self-assessment to subrecipients. The assessment consisted of questions such as:
 - What office of department, if any, within your municipality administers federal-aid programs and projects?
 - Please provide a link of the location where this document is prominently displayed online. If your municipality does not have a website, please email the attachment.
 - Does your municipality have written procedures to accept complaints from the public alleging discrimination based on race, color, national origin, sex, age, and disability? (Note: this question does not relate to your municipality's Title VII employment discrimination policies/procedures).
 - How does your municipality make the public aware of its nondiscrimination policies and their right to file a discrimination complaint?
 - Briefly describe the planning and project level procedures your municipality follows to minimize or mitigate disproportionately high and adverse health and safety impacts to minority and low-income communities within its jurisdiction in accordance with Executive Order 12898- Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
 - Describe any specific outreach strategy, or targeted outreach, your municipality uses to solicit program and project level input from communities or groups that represent minority, low-income, elderly and persons with disabilities.

- The Title VI Coordinator reviewed responses from the Title VI Assessment Tool during the desk assessment phase and confirmed the names and titles of each subrecipient's Title VI Coordinator. Subrecipients submitted updated nondiscrimination assurances upon request, provided links and/or locations for applicable notices and policies, and indicated the types of demographic data collected.

- The Title VI Coordinator conducted one (1) compliance review with the City of Pawtucket through a scheduled notification to discuss any preliminary deficiencies observed and to request any additional information necessary. A site visit will be conducted to monitor ongoing compliance.

2024 GOALS

- The Title VI Coordinator plans to conduct one in-depth subrecipient review during FFY 2024. The Title VI Coordinator will utilize assessment outcomes to develop risk-based criteria and to prioritize and select a subrecipient for review. Based on the in-depth review the Title VI Coordinator will develop a detailed report of the subrecipient's Title VI Program and activities to acknowledge the subrecipient's Title VI Program strengths and, if needed, provide recommendations.
- The Title VI Coordinator will disseminate additional Title VI resources and trainings to subrecipients and continue to provide ongoing technical assistance to subrecipients, as needed.

III. TRAINING AND TECHNICAL ASSISTANCE

23 CFR 200.9(b)(9)

2023 ACCOMPLISHMENTS

- The Title VI Coordinator maintained communication with the Education Advancement Interdepartmental Project Manager to continue offering a Title VI Training provided by FHWA for all internal Staff and new employees. The training is launched through the State’s training portal the “RI Learning Center.” An inter-office memorandum is sent to all staff with information about Title VI, the Department’s responsibilities under the law and corresponding regulations, and how to identify and report discrimination. The RI Learning Center automatically registers all internal Staff annually with an assigned due date. Similarly, new employees are registered when they begin employment at RIDOT and also are assigned a due date for training completion.

The training covered the following topics:

- Title VI Essentials;
 - Title VI Complaints;
 - Title VI- Intentional Discrimination and Disparate Impact;
- The Title VI Coordinator monitors Staff progress and completion through weekly generated Title VI training reports from RI Learning Center. Follow up notifications are sent on an as needed basis.
 - During FFY 23, 350 internal Staff, subrecipients, and contractors completed the Title VI trainings.
 - The Title VI Coordinator participates in Title VI and nondiscrimination training as it becomes available. Attendance from the Office of Civil Rights at Title VI and EJ trainings during FFY23 consisted of:
 - Strategic Workforce Development: Building Your Workforce Team by FHWA (webinar) on November 1, 2022
 - Advocating for Your Construction Workforce by FHWA (webinar) on November 5, 2022
 - Promising Practices for Meaningful Public Involvement in Transportation Decision-making by USDOT (virtual pilot training) on November 9, 2022
 - EDC-7 Topic: Strategic Workforce Development Seminar by FHWA (webinar) on February 15 and 26, 2023
 - NTI: Public Involvement in Transportation Decision Making by NTI (webinar) on February 27 – March 1, 2023
 - Advancing Transportation Equity by the Transportation Research Board (webinar) on March 9, 2023
 - Census Town Hall: Race and Ethnicity Statistical Standards by OMB on March 14, 2023
 - SWD: Women in Construction by USDOT (webinar) on March 21, 2023
 - Successes & Challenges – the First 4 Years of Federal Performance by the Transportation Research Board (webinar) on March 30, 2023
 - Equity in Roadway Safety Leadership by USDOT (webinar) on April 17, 2023

- DeIDOT Equity Tool Demonstration by Delaware DOT (virtual training) on May 24, 2023
- Advancing Equity in the Construction Industry: Promising Practices by USDOL (webinar) on May 25, 2023
- Disability Data Through a Different Perspective by US Census (webinar) on May 25, 2023
- Accessing 2020 Census Demographic and Housing Characteristics Data by US Census (webinar) on May 30, 2023
- Justice40 ETC Explorer Tool Updates by USDOT (webinar) on June 2, 2023
- Tools to Conduct Equitable Safety Data Analysis by USDOT (webinar) on June 14, 2023
- Advancing Women and People of Color: Equity in Infrastructure by USDOL (webinar) on June 15, 2023
- EDC – 7 SWD Regional Summit by FHWA (in person) on June 27 – June 28, 2023
- EDC – 7 SWD: Supportive Services by FHWA (webinar) on August 3, 2023
- EDC – 7 SWD Webinar: Welcome New States by FHWA (webinar) on September 7, 2023
- Innovation Webinar: Measuring Food Access to Improve Public Health by UMass Amherst (webinar) on September 28, 2023

- The Office of Civil Rights will request additional program assistance in EJ, data collection and analysis, and limited English Proficiency (LEP) training from FHWA. In addition to this, the Title VI Coordinator will participate in all relevant local seminars as they are made available.
- In February 2023, RIDOT’s Office of Civil Rights attended FHWA’s Every Day Counts 7 (EDC-7) Virtual Summit. The Title VI Coordinator attended sessions that prioritized Strategic Workforce Development (SWD). RIDOT has been identified as one out of five states that has successfully institutionalized its strategic workforce development efforts and has committed to promoting the Department’s best practices, providing resources, and offering technical assistance to other state and local agencies through in person and virtual trainings from April 2023 until May 2025.
- The Title VI Coordinator maintains standing monthly meetings with RIDOT’s Community Liaison Officer to discuss current and upcoming projects. RIDOT’s Community Liaison Officer conducts community meetings to inform the public of upcoming projects and provide project updates. The Title VI Coordinator attends these community meetings via a virtual platform as well as in-person community meetings to gain knowledge of any potential Title VI concerns, remedies, and to provide technical assistance regarding Title VI, as needed.
- The Title VI Coordinator continues to provide technical assistance to RIDOT’s project managers. The Title VI Coordinator is a permanent member of RIDOT’s Scoping Team. The Scoping Team meets to develop the scope document of programmed projects, identify potential impacts and, when applicable, warranted mitigation measures. These meetings serve as training opportunities to raise awareness for scoping team members of Title VI-related requirements applicable to all projects. The result of these meetings is a scoping document that contains the demographic and socio-economic profile of each project, any potential long-term or short-term impacts, and warranted proposed mitigation. The demographic and socio-economic profiles of the project area are obtained

through the EJSscreen which provides a breakdown by race and national origin, and percentages of minorities, low-income, and linguistically isolated households. The potential long-term or short-term disruptions to services and accessibility impacting the population and communities within the project area are assessed by comparing information obtained through EJSscreen, Google Maps, RIDOT's databases, and site visits (subsidized and public housing, pedestrian generators, bus routes and stops, community and governmental social service organizations, etc.) with specifics pertaining to the design and construction of the project (acquisition of right-of-way, pedestrian and bike access, sidewalk closure, bus route and detours, bus stop relocation, etc.). The mitigation proposals are intended to maintain accessibility and minimize service disruption, as feasible.

- On an as needed basis, the Title VI Coordinator maintains and updates the list of web-based trainings to assist division staff members and subrecipients to familiarize themselves with the purpose and requirements of RIDOT's Title VI Program. The list of web-based training has been included in the Title VI Implementation Plan. The Title VI Coordinator will disseminate the Title VI resources and trainings to internal staff and subrecipients, as applicable.

- RIDOT supports environmental justice through every stage of its planning, construction, and maintenance processes. This ensures that RIDOT gains input from the community that will help shape how the agency builds and maintains roads, bridges, rail lines, ports, and trails. RIDOT pursues this goal by working to:
 - Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on low-income and minority populations;
 - Ensure the full and fair participation by all potentially affected communities in the transportation decision making process; and
 - Prevent the denial of, reduction in, or significant delay in the receipt of benefits by low-income and minority populations.

- A Title VI Brochure is displayed on the RIDOT website. The Brochure includes information on the history of Title VI, RIDOT's commitment, Title VI implementation, and how to file a Title VI claim. The Brochure is available on the RIDOT website in Spanish as well.

2024 GOALS

- The Title VI coordinator will evaluate the efficacy of the training method and content in improving staff's knowledge of Title VI and incorporation of Title VI-principles in their programs, services, and activities.
- The Title VI Coordinator will work with the Educational Advancement Interdepartmental Project Manager to monitor employee participation regarding the available Title VI course currently available on the RI Learning Center.
- The Title VI Coordinator will continue to work with the Human Resource Office and the Training Office to incorporate the Title VI trainings currently available with the onboarding of all new RIDOT staff.
- During FFY24, the Title VI Coordinator will also monitor the effectiveness of the Language Access Plan by conducting a Four Factor Analyses. Based on the results of the analysis, the LEP Plan will be reviewed and updated as needed to continually provide meaningful access to LEP persons across the state.

IV. COMPLAINT PROCEDURE & CORRECTIVE ACTIONS

23 CFR 200.9 (b)(3)

2023 COMPLAINTS

RIDOT did not receive any Title VI/Nondiscrimination complaints during FFY 2023.

2024 GOALS

The Title VI Coordinator will continue to monitor and report on the:

- Number of Title VI complaints filed against RIDOT and forwarded to FHWA;
- Number of Title VI complaints filed with RIDOT against sub-recipients;
- Number of completed investigations conducted by RIDOT;
- Number of investigations with findings completed by RIDOT;
- When applicable, a summary and current status of each complaint will be provided to FHWA's Rhode Island Division Office.

2023 CORRECTIVE ACTIONS

RIDOT did not implement any Title VI corrective action during FFY 2023.

2024 GOALS

The Title VI Coordinator will continue to implement and monitor:

- Number of ongoing CAP activities;
- Number of completed CAP activities;

When applicable, a detailed report of ongoing or completed activities of a Corrective Action Plan (CAP) will be provided to FHWA's Rhode Island Division Office.