



RHODE ISLAND PUBLIC TRANSIT AUTHORITY



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Title VI Program 2018 - 2021

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RIPTA Title VI Program: 2018-2021

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CHAPTER ONE

INTRODUCTION

This document constitutes the Rhode Island Public Transit Authority's 2018 Title VI program, as approved by the Board of Directors at its March 2018 meeting. The Board Resolution approving the plan is attached as Exhibit I.

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements. The Federal Transit Administration (FTA) of the United States Department of Transportation issued guidelines on May 26, 1988, FTA C 4702.1, describing the contents of Title VI compliance programs to be adopted and maintained by recipients of FTA-administered funds for transit programs. On October 1, 2012, these guidelines were updated with the publication of FTA C 4702.1B, which now requires that Title VI compliance programs include income status in addition to minority status.

CHAPTER TWO

GENERAL REPORTING REQUIREMENTS

PROCEDURES FOR FILING A CIVIL RIGHTS COMPLAINT

POLICY

It is the policy of the Rhode Island Public Transit Authority (RIPTA) to utilize its best efforts to ensure that all programs and services are implemented without discrimination and with the inclusion of minority and protected-class interests through its civil rights policies and procedures. RIPTA's Title VI policy, in accordance with Title VI of the Civil Rights Act of 1964, assures that no person or groups of persons shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by its departments. RIPTA has a zero-tolerance policy prohibiting any form of unlawful discrimination against its customers. Discrimination, harassment, or retaliation against our customers is strictly prohibited.

Toward this end, it is the objective of RIPTA to:

1. Ensure that the level and quality of transportation service is provided without regard to race, color, national origin, and other protected characteristics;
2. Identify and address issues of environmental justice based on income status;
3. Promote the full and fair participation of all affected populations in transportation decision making;
4. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
5. Ensure meaningful access to programs and activities by persons with limited English proficiency, disability, and veteran status.

The Chief Executive Officer of the Authority has overall responsibility for carrying out RIPTA's commitment to the Title VI program. In April, 2013, RIPTA created a new position of Compliance Officer to oversee EEO, DBE and Title VI. The Compliance Officer has been delegated the responsibility of coordinating program procedures, overseeing implementation, and monitoring and reporting on the progress attained. The Title VI program is an Authority-wide initiative, and all managers, supervisors, and employees share the responsibility of identifying and reporting civil rights violators. Appropriate training is provided to customer support representatives, supervisors, superintendents, and other employees. Department managers (or their designees) are responsible for receiving and investigating complaints, which come through various intake venues, including the Customer Service department.

RIPTA has developed a complaint procedure related to Title VI and other civil rights customer complaints. However, this procedure does not deny a complainant the right to file formal complaints with the Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

PROCEDURE

The following is a summary of the internal procedures that RIPTA uses for investigation and resolution of Title VI and other civil rights customer complaints. These procedures are employed for all complaints received by the departments that are responsible for complaint intake, investigation, and processing. (See Appendix, Exhibit A)

1. Any person or groups of persons who believe that they have been aggrieved by unlawful harassment, retaliation, or other discriminatory practice under Title VI or other statutes or have been excluded from participation in, denied the benefits of, or subjected to harassment, retaliation, or other forms of discrimination based on race, color, or national origin, under the program of transit service delivery or related benefits, may file a complaint with RIPTA. Complaints may be filed by contacting the Compliance Officer, or by visiting the Civil Rights section of the RIPTA web site at <http://www.ripta.com/civil-rights--title-vi> and downloading a copy of the Title VI complaint form in either English or Spanish and submitting it to RIPTA via U.S. Mail.

To receive consideration complaints need not use the key words “complaint,” “civil rights,” or “discrimination,” or their near equivalents. It is sufficient if such allegations imply any form of harassment, retaliation, or unequal treatment in one or more of RIPTA’s programs or services to be considered and processed as an allegation of a discriminatory practice.

2. All complaints, written or verbal, shall be accepted. In the event a complainant sets forth allegations verbally and refuses to reduce such allegations to writing, the person to whom the complaint is made shall reduce the complaint to writing. Complaints should include the following information:
 - Name, address, and telephone number of the complainant, if provided;
 - Basis of the complaint: race, color, national origin, sex, age, or disability;
 - Date on which the alleged discriminatory event occurred;
 - Nature of the incident that led the complainant to believe that discrimination was a factor;

- Location, date, time, and other identifying information; employee badge number; and number of vehicle, if known;
- Names, addresses, and telephone numbers of persons (witnesses) who may have knowledge of the event; and
- Other agencies or courts where complaint may also be filed and a contact name for each.

All complaints received by any department should be forwarded to the Compliance Officer. Complaints will then be transmitted to the appropriate administrative staff for investigation

3. The appropriate staff person shall investigate regular civil rights complaints and assist the Compliance Officer in investigations of more serious and egregious complaints. Investigations may include identifying and interviewing persons with knowledge of the alleged Title VI violation (*e.g.*, the person making the complaint, witnesses, or anyone identified by the complainant) or anyone with relevant information. The person who has been accused of discriminating or committing a prohibited act will be notified and will be permitted to respond to the allegation. If necessary, additional information may be requested from the complainant and witnesses.
4. If warranted, meetings may also be held with the complainant to resolve the complaint. The investigator may request guidance from Compliance Officer, as deemed necessary.
5. Upon completion of the interviews and investigation, the investigator will develop a final report based on the facts and submit it to the Compliance Officer. The report will contain the investigation team's findings and conclusions concerning the complaint as well as recommendations for corrective action and discipline, if necessary. If a civil rights violation is found to exist, appropriate action will be taken, monitored, and reported. Any actions taken as a result of the investigation team's findings and conclusions are the responsibility of the concerned department and other officials involved. If no violation is found and the complainant is not satisfied, complaints may be filed with FTA's Office of Civil Rights.
6. The complainant will receive a letter from RIPTA that details the findings, conclusion, and any corrective action taken.

7. The Compliance Officer will maintain a log of complaints, including those pertaining to Title VI, accessibility, and other customer complaints of discrimination, harassment, or retaliation; the date the complaint was filed; a summary of the allegation(s); the status of the complaint; and the actions taken in response to the complaint.
8. Should RIPTA receive a Title VI complaint in the form of a formal charge or lawsuit, RIPTA's Legal Counsel will be responsible for the investigation and for maintaining the log as described herein.

INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

There have been no investigations, complaints, or lawsuits filed with RIPTA since the 2015 Title VI submittal to FTA.

PLAN FOR PROVIDING MEANINGFUL ACCESS FOR PERSON'S WITH LIMITED ENGLISH PROFICIENCY

On August 11, 2000, President William J. Clinton signed an executive order, **Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency**, to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part:

Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.

Not only do all federal agencies have to develop LEP Plans, but as a condition of receiving federal financial assistance, recipients must also comply with Title VI and LEP guidelines of the federal agency from which funds are provided. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all components of a recipient's operations are covered. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

Who is an LEP Individual?

As defined in the 2000 United States Census, it is any individual who speaks a language at home other than English as their primary language, and who speaks or understands English "less than very well." In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, RIPTA will take reasonable steps to ensure that all persons have meaningful access to its programs, services and information, at no additional cost.

The LEP Plan starts with an assessment to identify LEP individuals who need assistance. Implementation includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring of the plan.

Determination of Need

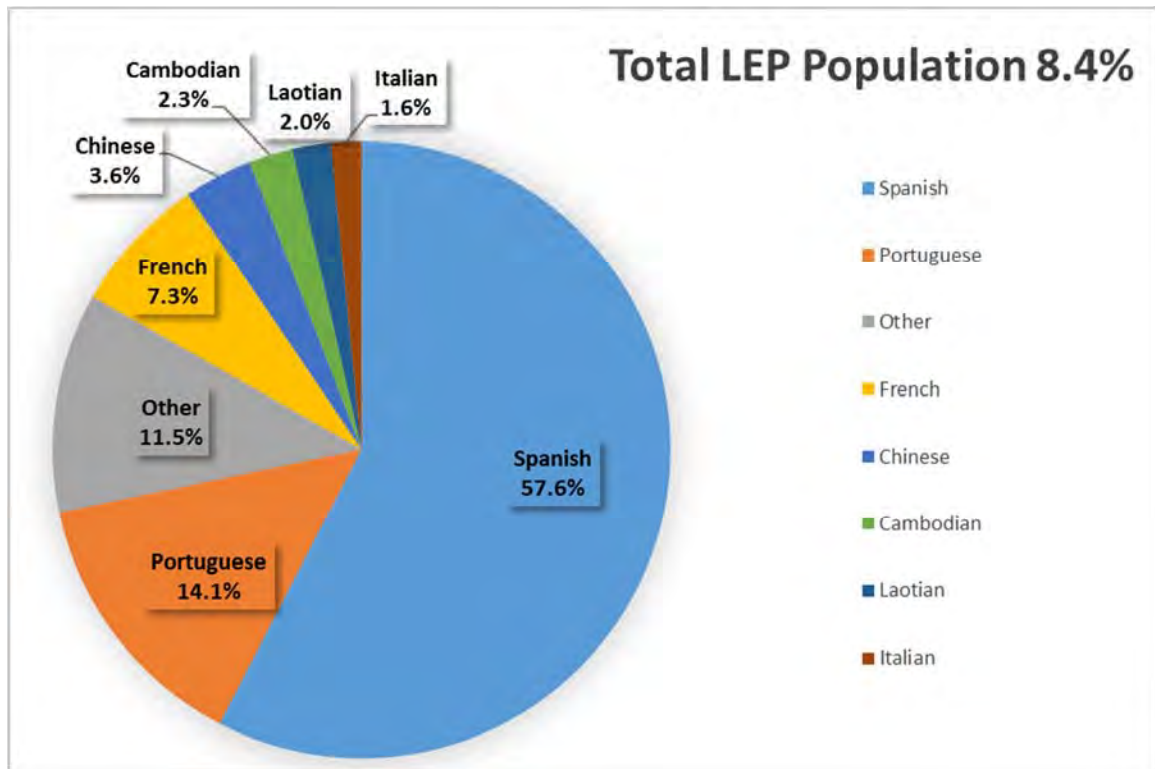
In order to develop this policy, RIPTA has followed the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a RIPTA program, activity or service;
2. The frequency with which LEP persons come in contact with RIPTA programs, activities or services;
3. The nature and importance of programs, activities or services provided by RIPTA to the LEP population; and
4. The resources available to RIPTA and overall costs to provide LEP assistance.

Factor 1:

The number and proportion of LEP Persons served or encountered in RIPTA's service area.

RIPTA's service area is the entire State of Rhode Island, which has a total population of 1,002,282 (excluding children under five). RIPTA has determined the percentage of the State's LEP population by consulting the 2016 American Community Survey by the U.S. Census Bureau (Appendix, [Exhibit B](#)). The survey shows that 84,295 individuals (8.4%) in Rhode Island have Limited English Proficiency because they speak English less than "very well." Table 1 below contains a breakdown of this LEP population by language.



Appendix, [Exhibit B](#): U.S. Census Bureau 2016 American Community Survey, B16001.

LEP populations as a percentage of Rhode Island's total population are as follows: Only Spanish (4.84%), and Portuguese/Portuguese Creole (1.19%) represent more than 1% of Rhode Island's total population. The next highest language groups were French/French Creole (.061%), Chinese (.030%), Cambodian (.019%), Laotian (.017) Italian (.013%). No other language group accounts for more than .01% of Rhode Island's total population.

Factor 2:

Frequency of contacts of LEP individuals with RIPTA's programs, activities, and services.

RIPTA has three data points for assessing how often and in what ways LEP populations interact with the RIPTA system: (1) the use of RIPTA's translation services; (2) the results of an internal RIPTA survey; and (3) the results of an external survey.

Translation Services

Since April of 2012, RIPTA has contracted with Voiance Language Services to provide 24/7 translation service in 173 languages. From January 1, 2015 to December 31, 2017, RIPTA received 163 calls for an average of 54 calls per year and slightly more than one call per week requesting translation into 8 different languages. Spanish was overwhelmingly the most requested language. In during the 3 year period, 87.7% of the requests for were for Spanish; 6.1% for Portuguese; and 6.2% for six other languages (French, Mandarin Chinese, Vietnamese, Russian and Korean). In 2015, Spanish represented 94.3%, while Portuguese represented 5.7%. In 2016, 84.9% of requests were for Spanish, 4.1% for Portuguese, 4.1% for French and 6.9% for 4 other languages. In 2017, Spanish represented 75.0%, Portuguese 15.0% and Mandarin Chinese 10.0%. (Appendix, Exhibit C)

Internal RIPTA Survey

In December 2017, an LEP survey was developed and distributed to RIPTA administrative and customer service staff, transportation supervisors, and RIPTA drivers (fixed route and paratransit) in order to obtain information about frequency of contact with LEP individuals. These RIPTA employees are the most likely to come into contact with the LEP population on a daily basis. Of the total of 545 surveys sent, 106 surveys were completed, for a response rate of about 19%. The surveys were divided among four groups (1) Customer Service staff (15 surveys completed); (2) Administrative staff (19 surveys completed), 3) Fixed Route Drivers (50 surveys completed); and (4) Para Transit Drivers (22 surveys completed). The following are the highlights of the customer service and administrative staff survey results:

- On average, customer service staff assists LEP customers 7.9 times per week, with a range of zero to twenty times per week;

- On average, administrative staff assists LEP customers 2.3 times per week, with a range of zero to ten times per week;
- Spanish was reported as being by far the most frequent language encountered by customer service and administrative staff. Portuguese, though less often, is also encountered regularly. Other languages, including Cambodian (Khmer), French, Chinese, French, Italian and Arabic were seldom encountered;
- 27% of customer service and administrative respondents reported that they are able and qualified to translate English into another language. The reported languages include Spanish, Portuguese, Portuguese Crioulo, Italian and French., French Creole.
- 73% of customer service respondents and 18% of administrative respondents reported that they have used translation assistance on the job, which were identified as:

Customer Service	Administrative
○ Co-worker – 73%	17%
○ Telephone – 47%	11%
○ Internet – 27%	06%
○ Other services mentioned included Voiance, Volunteers and “Pointing at Products.”	

As mentioned, surveys were also distributed to fixed route drivers and paratransit drivers. They were asked how often they assisted LEP customers, and to identify which languages they most encountered. Below are the results of the surveys:

- Fixed route drivers assist LEP customers an average of 6.3 times per week, with a range of zero to seventy times per week.
- In order of frequency, fixed route drivers encounter the following languages:
 1. Spanish
 2. Portuguese/ Portuguese Crioulo
 3. Mandarin Chinese
 4. French or French Creole
 5. Cambodian (Khmer)
 6. Italian
- Paratransit drivers assist LEP customers an average of 4.9 times per week, with a range of zero to twenty-five times per week.

- In order of frequency, paratransit drivers encounter the following languages:
 1. Spanish
 2. Portuguese
 3. French or French Creole
 4. Italian
 5. Mandarin Chinese
 6. Khymer (Cambodian)

- Other languages mentioned by both fixed route and para transit drivers as being encountered, with lesser frequency, were Russian and Ukranian.

These survey results are consistent with data provided by the U.S. Census with Spanish and Portuguese being the most commonly encountered languages in RIPTA’s service area. At an average of 7.9 times per week, Customer Service had the most encounters with LEP individuals.

External LEP Survey

RIPTA provided twelve community organizations¹ who work with LEP populations with a survey in order 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; transit needs of LEP individuals that are not being met; and to identify of barriers to the use of transit. Twelve surveys were sent out and seven were completed for a response rate of 58%. Following are the highlights of the questionnaire responses:

- Agencies noted an increase in populations that speak the following languages: Arabic, Portuguese Crioulo, French Creole, Hindi, Somali, Swahili, Kirundi, Quiche, Burmese, Afghani and Syrian;

- One agency cited a decrease in populations that speak Cambodian (Khymer) and Mandarin Chinese;

¹ Those organizations are Dorcas/ International Institute of Rhode Island, Progreso Latino, Blackstone Valley Community Action Program, Family Resources Community Action, Center for Southeast Asians, Genesis Center, St. Michaels, Catholic Diocese, RI Family Literacy Initiative, East Bay Community Action Program, Community Action Partnership of Providence, and the Children’s Friend

- When asked about client knowledge of RIPTA Programs and Services. The response rate was the following:

	Awareness Rate
1) Monthly Pass, RIPTIK, 15-Ride Pass, 7-Day Pass, 1-Day pass	57%
2) Flex Service	14%
3) Commuter Resource RI	14%
4) Rack N' Ride	29%
5) Park N' Ride	14%
6) RIPTA's online trip planner	00%
7) Bus Pass Program for Seniors and People with Disabilities	71%
8) Ride Para Transit Service	00%

- Some organizations mentioned specific transit needs of their LEP clients. Comments included:
 - Extend weekend and evening hours;
 - RIPTA staff are not multilingual, which can be a communication barrier with some riders;
 - Flex service needs to expand;
 - Some areas are difficult to access, for example, parts of Olneyville;
 - The cost is difficult for some to afford;
 - Fear of not being able to communicate;
 - Cultural competency of drivers;
 - Cost.
- The most commonly cited barriers to the LEP population's use of transit included language, affordability, and availability.

Factor 3:

Assess the importance of RIPTA's programs, activities, and services to the LEP population.

As stated in the U.S. Department of Transportation's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, RIPTA operates in full agreement that an LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to

employment. While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons.

According to the 2010 Census, more than 11% of LEP individuals aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be LEP) use public transit at higher rates than native-born adults. However, public transit use among recent immigrants decreases with length of residence in the United States.

Most of RIPTA's services run through its central hub in Providence, which is an urban core, and which therefore contains a higher LEP population relative to more suburban and rural areas. As a result, RIPTA is mindful that its services are critical to the LEP population.

Factor 4:

The resources available to RIPTA and the costs.

RIPTA is committed to employing resources to reduce the barriers that limit access to its information and services by LEP persons. RIPTA has established a dedicated budget for its LEP Program, and will track all expenditures made for this purpose. RIPTA will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan. RIPTA currently employs the following resources to help provide language assistance. These resources are funded with RIPTA's operating funds.

Dedicated Title VI Officer

RIPTA employs a dedicated Title VI officer who oversees RIPTA's LEP Program. One of the primary functions of this officer is to communicate with LEP population on a regular basis to determine how RIPTA can provide this population with language assistance so that it can access the RIPTA system. The Title VI officer does this, primarily, by regular communication with groups who have significant LEP constituents. Communication is done through internal and external meetings, phone calls, emails and surveys. The goals of these communications are to identify documents, such as pages of the web site or public timetables that would assist LEP persons in accessing RIPTA programs and services.

Marketing Department

RIPTA's Marketing Department is responsible for RIPTA's communications with the public by providing content on RIPTA's website; creating and distributing materials in RIPTA's transit facilities and vehicles; conducting in-person public outreach; and facilitating public hearing and comments on RIPTA's services. The Marketing Department works closely with the Title VI officer to coordinate communication to the LEP population.

Customer Service

RIPTA's Customer Service Department receives questions, requests for information and assistance and complaints. Two Customer Service representatives can translate Spanish, and obtain assistance from other employees for Portuguese and Italian translation. These representatives are also trained in how to direct callers who need language assistance to Voiance Language Services, which RIPTA uses to provide translations to all LEP individuals. (Voiance is discussed in more detail below.)

LANGUAGE ASSISTANCE PLAN

Based on the four-factor analysis above, RIPTA has determined that the Spanish LEP population needs the most language assistance because it represents 4.48% of Rhode Island's total LEP population. Portuguese is second at 1.16% of the LEP population. The next closest three languages each represent less than 1% of the LEP population.

RIPTA provides language assistance to Rhode Island's LEP populations as described below.

Oral Translations

As noted above, any LEP individual can obtain oral translation services by calling RIPTA's Customer Service Department, where they are transferred to Voiance Language Services, which provides written and oral translation service in over 170 languages with 24/7 availability

The following are the procedures used by RIPTA staff to connect LEP callers to Voiance.

"CUSTOMER SERVICE REPRESENTATIVES AND OTHER ADMINISTRATIVE PERSONNEL:
When you receive a call from a Limited English Proficiency (LEP) customer and you cannot understand what the LEP customer needs, you should do the following:

- Using the Voiance Phonetic Chart, tell the caller to please hold;

- Press the Conference Button on your phone labeled CNF;
- Contact Voiance Language Services for assistance by dialing 866-998-0338;
- An automated voice prompt will then ask for your Account Number: 14071;
- An automated voice prompt will then ask for your Pin Number: 5355;
- An automated voice prompt will then ask you to say the language OR enter a 3-digit language code (see Language Code List) for the language you need translated;
- Hold temporarily as you connect to an interpreter;
- Write the interpreter ID number down in your call log;
- Brief the interpreter on the nature of your call;
- Ask the interpreter to please hold while you conference him/her in;
- Press the Conference Button (CNF) TWICE (this will send the interpreter into the conference call and then connect you to the call);
- Begin your conversation. Allow the interpreter to introduce him/herself to the customer. Avoid slang, jargon or metaphors;
- Once the call is completed, fill out the Customer Service Translation Service Form complete with a summary of the call, including the language that was translated. Turn in the completed form to the Customer Service Manager;
- If you are a bi-lingual RIPTA employee and you are able to assist the LEP customer, please log the information with the Customer Service Manager.”

Written Translations

RIPTA follows DOT’s Safe Harbor Provision with respect to the written translation of documents. This provision requires written translation of vital documents for language groups constitute either 5% or 1,000 individuals within RITPA’s service area. According to the U.S. Census Bureau, 2016 American Community Survey, no LEP language group constitutes more than 5% of RIPTA’s service population, but the following seven languages have more than 1,000 individuals: (1) Spanish (48,540); (2) Portuguese (11,852); (3) French/French Creole (6,183); (4) Chinese (3,030); (5) Khmer (Cambodia) (1,909); (6) Laotian (1,767); and (7) Italian (1,339).

RIPTA has identified its vital documents as (1) How to Ride Guide, (2) Overview of the RIPTA Bus Pass Program for Seniors and People with Disabilities, (3) Application for RIPTA ADA Para Transit Service Certification, (4) RIDE ADA brochure, (5) Public Hearing Notices, (6) Title VI brochure and (7) Title VI complaint form. In August 2015, RIPTA posted translations of these documents into the seven safe harbor languages and Arabic on its

website (www.ripta.com). As noted above, translation of non-vital documents is provided, upon request, by Voiance.

RIPTA also provides all its schedules and service change information in English and Spanish.

Language Assistance Cards

RIPTA has created Language Assistance Cards that state, in each of the seven safe harbor languages and Arabic, how to contact RIPTA for language assistance. The cards are placed in all transit centers and RIPTA vehicles, and may also be viewed on RIPTA's website. (Appendix, [Exhibit D.](#))

Google Translate

The RIPTA website (www.ripta.com) was updated in February 2012 to include the Google Translate application directly on the site; the application automatically can translate the entire RIPTA web site into Spanish, Portuguese, Chinese, French and Italian. If Google Translate does not translate to the satisfaction of the customer, the customer can contact RIPTA's Customer Service Department, who can use Voiance for a better translation.

Other Language Assistance

RIPTA has open lines of communications with organizations that work with LEP populations. These organizations are aware of how to contact RIPTA to obtain language assistance. RIPTA also analyzes census data and community profiles to determine whether language assistance might be needed in certain settings, such as having public meeting notices translated in safe harbor languages when meetings occur in areas where data suggests that translations are needed. RIPTA also honors requests for translations at our public meetings, when such requests are made within 72 hours of the hearing.

MONITORING AND EVALUATING LANGUAGE ASSISTANCE PLAN

RIPTA has and will continue to conduct the following to monitor and evaluation the effectiveness of its Language Assistance Plan, and will make improvements where needed.

- Solicit feedback from the LEP community by distributing a questionnaire to the 12 organizations listed in the four-factor analysis and others identified during the year. Also, RIPTA will conduct driver and frontline staff surveys;
- Measure changes in the number and proportion of LEP persons eligible to be served by examining updates from the Voiance Language Service, the US Census and any available data from the public school districts in the RIPTA service area;
- Assess the demographic profile of public meeting attendees for whether language services are needed;
- Consider measuring actual frequency of contact by LEP persons by collecting information from the Customer Service Department, the new RIPTA website, from front-line employees, and through customer surveys of customers who request language assistance services;
- Conducting rider surveys to specifically collect LEP information;
- Assess any and all LEP complaints to improve access.

RIPTA’s monitoring are efforts are reflected in the Voiance data (Appendix, [Exhibit C](#)) and the results of the External and Internal LEP Surveys described in the Factor 2 section above.

RIPTA will make changes to its language assistance plan as needed, but at a minimum, the plan will be updated every three years to coincide with RIPTA’s Title VI submittal to the Federal Transit Administration.

RIPTA also has developed a policy regarding sub-recipients notifying them of their responsibility under Title VI to take reasonable steps to insure access to LEP populations. RIPTA will monitor their performance and compliance.

LEP TRAINING

As of February 2018, RIPTA has approximately 551 front line employees identified as the most likely to come into contact with LEP persons. These employees are comprised of the following categories:

Department	Count
Fixed-Route Bus Operator	392
Ride Bus Operator	123
Supervisor	20
Customer Service	16

All these employees are trained to be aware and assist LEP individuals by directing to RIPTA's Customer Service, which will then connect them to Voiance. In addition, all vehicle operators carry Language Assistance cards written in the seven safe harbor languages and Arabic, which also provide information how to contact RIPTA customer service. These cards are also available at RIPTA stations and ticket windows.

NOTIFICATION TO BENEFICIARIES OF PROTECTION UNDER TITLE VI

The following text is available as a brochure (Appendix, Exhibit E), in English and Spanish at the following locations: On RIPTA's website, on RIPTA transit centers in Kennedy Plaza, the Newport, and Pawtucket, at RIPTA's Elmwood Avenue operations and management facility, and on all fixed route buses and paratransit facilities. The Notice is also available on RIPTA's website in the seven safe harbor languages, and RIPTA is developing a way to provide the Notice in all eight languages in all locations where it is currently available in English and Spanish.

Information on Title VI Protecting Your Rights

What is Title VI?

Title VI of the Civil Rights Act of 1964 is a federal statute declaring that no person shall be discriminated against or denied benefits on the basis of race, color, or national origin, in programs and services that receive federal financial assistance. To ensure that RIPTA customers are not discriminated against, we have adopted policies that promote equal access and quality service for all our customers.

What Does Title VI Mean To You?

The Rhode Island Public Transit Authority hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities.

Public transit agencies, such as RIPTA, are required to provide services in a fair and equitable manner to all passengers without regard to their race, color, or national origin. Title VI also requires RIPTA to reduce language barriers that may impede access to important services by customers who may not be proficient in English.

RIPTA also has a zero-tolerance policy prohibiting any form of unlawful discrimination.

For more information please go to the RIPTA website (www.ripta.com)

What Services Are Available to Customers Who Are Not Proficient in English?

Under Title VI, customers who are not proficient in English are entitled to assistance to help them access critical RIPTA information. If translation assistance is needed we can contact Voiance, which can provide telephone translation services in many languages, including Spanish, Portuguese, Chinese, Russian, and many more.

Additionally, RIPTA customer service agents and Supervisors are able to provide guidance for customers who are not proficient in English.

What Should You Do If You Have Complaint?

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with RIPTA. When submitting a complaint, please include your contact information as well as details of the incident including what occurred, where and when, and the names, addresses, phone numbers and e-mail addresses of witnesses.

You may:

- Send a letter to:
James Vincent
Compliance Officer
Rhode Island Public Transit Authority
705 Elmwood Avenue
Providence, RI 02907
- Call James Vincent RIPTA Compliance Officer at (401) 784-9500 ext. 1209.
- RIPTA Customer Support Services are available Monday-Friday 8:30 AM - 4:30 PM.
- Go to ripta.com and download a copy of the Title VI Complaint Form to fill out and send to the above address.

RIPTA Welcomes Your Feedback!

RIPTA is committed to providing safe, efficient and quality transportation services to all the communities we serve. If you have any suggestion on how we can improve on our commitment to non-discrimination, or how we can better serve the needs of customers who are not proficient in English, we would like to hear from you.

CONSTRUCTION PROJECTS

Since its 2015, RIPTA has not undertaken construction of facilities meeting the definition provided in Circular 4702.1B, Section III (13), Determination of Site or Location of Facilities. Any planning or construction of facilities undertaken in the future will be evaluated for potential Title VI or Environmental Justice impacts.

PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is a guide for RIPTA's ongoing public participation endeavors. Its purpose is to ensure that RIPTA utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

RIPTA's public involvement process aims to give the public ample opportunities for early and continuing participation in critical transportation projects, plans and decisions, and to provide full public access to key decisions. Engaging the public early and often in the decision-making process is critical to the success of any transportation plan or program, and is required by numerous state and federal laws.

I. INTRODUCTION

A. Rhode Island Public Transit Authority (RIPTA)

RIPTA is a quasi-public, independent authority. Established in 1966, RIPTA is authorized to operate public transit services throughout the State of Rhode Island. The agency is governed by a governor-appointed eight member Board of Directors. RIPTA operates

3,159 daily trips on 57 statewide fixed bus routes. RIPTA provides discounted fares for seniors and persons with disabilities. Children ages 5 and under ride free when accompanied by an adult.

RIPTA provides a variety of written and oral language assistance services.

B. Purpose of the Public Participation Plan (PPP)

RIPTA developed the PPP to guide public involvement efforts and enhance access to RIPTA's transportation decision-making process by low income, minority and limited English proficient (LEP) populations. The PPP describes the overall goals, guiding principles and appropriate outreach methods that RIPTA could use to reach out to low income, minority and LEP populations.

Pursuant to Federal Transit Administration (FTA) Title VI regulatory guidance, federal funding recipients and subrecipients should seek out and consider the viewpoints of minority, low income and LEP populations in the course of conducting public outreach and involvement activities.

To meet these requirements, RIPTA developed the PPP, a document intended as a guide for how RIPTA will deepen and sustain its efforts to engage diverse community members throughout its service area. The PPP aims to offer early, continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at RIPTA. These examples have proven successful for RIPTA in doing outreach to these populations.

II. PUBLIC PARTICIPATION METHODS

A. Introduction

RIPTA will be successful in reaching out to low income, minority and LEP populations by utilizing a variety of methods to provide information, invite participation and seek input. Regardless of the method, RIPTA will select the most appropriate and feasible methods to support each public participation activity. Care should be taken to ensure that the selected methods are implemented in a manner that specifically targets the participation of low income, minority and LEP populations as well as the general public.

B. Methods and Considerations for Enhancing Participation

1. Methods and Considerations for Enhancing Participation from Low Income Populations

1a. Meeting Considerations

Meeting organizers will carefully consider meeting location and time in order to enhance participation from low income communities. RIPTA will coordinate meeting times with transit schedules ensuring that evening meetings occur while return transit trips are

readily available. Meetings will be held in accessible meeting locations, near or on a RIPTA bus line.

1b. Methods for Publicizing Participation Opportunities

Publicity at RIPTA stations and/bus stops would be one of the more effective methods for publicizing participation opportunities to low income populations. RIPTA will publicize opportunities at Kennedy Plaza and the transit hubs in Pawtucket and Newport. On occasion, RIPTA does do posting at local bus stops in English and Spanish when publicizing a change along a particular section of a route—such as a detour.

II. Methods and Considerations for Enhancing Participation from LEP Populations

The availability of interpreters at meetings and translated outreach materials is crucial to enhancing participation from LEP populations.

2a. Meeting Considerations

Meeting organizers will try to consider meeting location, time and accessibility in order to enhance participation from LEP communities.

2b. Methods for Publicizing Participation Opportunities

Publicize participation opportunities to LEP populations at RIPTA bus stations. RIPTA will also use ethnic media sources and online notices to publicize meetings.

III. Methods and Considerations for Enhancing Participation from Minority Populations

RIPTA will do outreach at community events and through neighborhood notices via email, Facebook posts and Tweets. RIPTA has developed productive working relationships with community organizations that serve people of color. RIPTA's Compliance Officer is the president of the NAACP Providence Branch and has close connections with the Rhode Island Black Business Association, the Rhode Island Black and Latino Contactor Association, Progreso Latino, the Center for Southeast Asians, the Cambodian Society of Rhode Island and the Narragansett Indian Tribe.

C. Menu of Public Participation Methods

The following menu of methods includes those used to inform, reach out and invite participation and seek public input.

1. Printed and Electronic Materials Produced by RIPTA

Outreach information can be publicized in print materials produced by RIPTA such as newsletters, flyers and posters. RIPTA newsletters include the monthly RIPTA e-newsletter. RIPTA flyers include periodic one-page Passenger Bulletins distributed at bus stops in Kennedy Plaza. Vital information in printed materials is currently translated into Spanish. In accordance with the FTA Title VI Circular "safe harbor" guidance, RIPTA will provide at the top of its website written translation of vital documents in the eight

languages in Rhode Island with more than 1,000 estimated LEP persons. RIPTA also distributes notices/flyers through community partners.

2. Printed Materials Produced by Other Organizations

Coordinating with community partners can be cost-effective and can help partner organizations provide information that is of interest to the groups they represent. Information can be publicized in local and regional community newsletters, church bulletins, flyers and other publications.

2a. Local Service Providers

Local service providers regularly communicate with community members through their newsletters to provide information about local services and activities of interest. For example, Housing Authorities communicate regularly with the community they serve through rent notices. Other service providers identified by community members included: emergency food and housing centers, daytime drop-in service providers, food banks, travelers' aid groups, veterans organizations and drop-in service providers.

2b. Local Schools, Community Colleges and Universities

RIPTA may be able to reach parents of schoolchildren by coordinating with local schools. Notices and flyers can be provided to the school, with students taking the notices home to their parents. RIPTA may also provide translated materials as recommended by school officials.

3. RIPTA Website

RIPTA's website (www.ripta.com) is a communications tool that provides substantial information about RIPTA policies, strategies, programs and services. The website is available in simplified Chinese, Spanish, Portuguese, French and Italian. RIPTA also uses social networking applications such as Facebook and Twitter.

If Google Translate does not translate to the satisfaction of the customer, then they can now contact RIPTA's Customer Service Department, who can use Voiance Language Services to get a better translation. RIPTA has contracted with Voiance Language Services, which provides written and oral translation service in over 170 languages with 24/7 availability.

4. Station Information Resources

RIPTA bus stations can provide information about RIPTA public participation opportunities, beyond basic fare and schedule information. RIPTA users can stay up to date on RIPTA public participation opportunities while they wait for their bus. Providing this information in multiple languages assists those with limited English proficiency. RIPTA currently provides brochures in English or English and Spanish.

Information resources located in RIPTA stations that are used to communicate schedule and service can also be used to conduct outreach. RIPTA newsletters, bulletin boards,

information kiosks and other information stations will also be used to promote participation opportunities.

5. Media Targeted to Ethnic Communities

Participation opportunities can be publicized through radio, television and newspapers that serve both English speaking and language-specific audiences, especially Spanish. Some local news or radio shows and local publications, such as free neighborhood weekly papers, are considered to be good sources of information and events in the immediate area. RIPTA will tailor its message to the appropriate audience. RIPTA will continue outreach to numerous media outlets in the area that are targeted or appeal to ethnic communities. RIPTA will continue and expand advertising and outreach to local and ethnic media sources, including TV public service announcements, radio, print and web-based outlets.

6. Coordination with Community Events

In cooperation with community organizations, RIPTA, mostly through its Commuter Resources RI Team, will continue its current practice of hosting information tables that provide materials about RIPTA service and outreach methods at community events and activities. These events can range in scale from large city-wide events to localized activities. Most community events can help RIPTA reach specific audiences such as seniors, youth, families with children, commuters and others.

7. Coordination with Other Agencies

RIPTA will develop partnerships with agencies that regularly communicate with local residents. RIPTA will identify agencies who serve low income, minority and LEP populations and where they convene. RIPTA will reach out to the following types of agencies: faith-based, geographic-specific such as tenant associations, neighborhood and community, education, social services, recreation, environmental, political, youth- and senior-oriented organizations. RIPTA can work with these partners to provide information about public participation opportunities, included in notices and regular mailings sent by these agencies.

8. Regular Meetings of Civic and Community Organizations

RIPTA will provide updates on its policies, projects, strategies and methods by participating periodically in scheduled meetings of local civic and community organizations. These gatherings provide an opportunity to make a presentation and answer questions. RIPTA does this on a limited basis—usually related to specific issues.

9. Community Meetings

Meeting formats are tailored to help achieve specific public participation goals. Some meetings are designed to share information and answer questions. Others are designed to engage the public in providing input, establishing priorities and helping to achieve consensus on a specific recommendation.

For all meetings, the venue will be a facility that is fully accessible for persons with disabilities and, preferably, is served by public transit. The venue should be a location that is familiar and comfortable for the target audience. If a series of meetings are scheduled on a topic, RIPTA will consider different meeting locations, since no one location is usually convenient to all participants.

9a. Community Meeting Formats

i. Open House

This format provides opportunities for participants to receive information at their own pace by visiting a series of information stations that may include table top displays, maps, photographs, visualizations and other tools. Individual questions are responded to by staff and technical experts. Some open houses include a short educational presentation and comment period at a designated time. Participants are often given comment cards so they can provide written comments. Staff may be assigned to take verbal comments and transcribe them to provide a written record. The Open House Format can be effective when RIPTA is seeking to introduce a new concept or when a lengthy process has been finalized and RIPTA is sharing the final results.

ii. Large Group Discussion

These meetings are usually focused on a specific topic and feature an informational presentation followed by a comment period. The comment period can be formal or informal depending on the number of participants and the meeting venue. Individual comments are often limited to 2-3 minutes, especially when there are a large number of people wanting to comment. This format can also include some interactive techniques suitable for a large group such as electronic or show of hands polling or short questionnaires or surveys.

9b. Community Meeting Considerations

i. Scheduling

RIPTA staff will coordinate the scheduling of community meetings with community partners to minimize conflicts. However, some scheduling conflicts may be unavoidable when a public participation activity is urgent or linked to a time-sensitive topic.

ii. Meeting Locations

Convenient and comfortable meeting locations are key to soliciting active public participation, particularly in low income, minority and LEP communities. RIPTA can host meetings in venues including the local branch libraries, YMCA, local school or community college, churches and many others. It is important that meetings are held in different venues since it is unlikely that no one location is ideal for all community members. Meeting locations can be rotated to ensure access for as many community members as possible. Community partners should be reminded that regardless of the popularity or convenience of a venue, RIPTA is required to conduct all public participation methods in locations that are fully accessible to persons with disabilities and the venues should be served by public transit.

iii. Meeting Times

Public participation methods can be scheduled at varying times of day and on different days of the week, especially weeknights after traditional work hours.

10. Focus Groups /Stakeholder Meetings

RIPTA will continue to host discussion groups held with small, targeted groups of participants on an as needed basis. Focus groups can provide in-depth information about projects, plans or issues that may impact a specific group or community. These groups can be both formal and informal and can be conducted in a specific language. RIPTA will proactively include low income, minority and LEP communities.

11. Special Events

RIPTA will develop special events to announce, highlight or kick-off its outreach about a policy, program, project or activity. Events can be region-wide or focus on a specific station or area.

12. Walking Tours and On-Site Meetings

RIPTA can host walking tours and on-site meetings specific to locations that interest the public in order to highlight an initiative, project or facility. Walking tours can be primarily educational and RIPTA may ask participants to complete a survey or questionnaire during or after the tour. Walking tours may be helpful in helping RIPTA collect community opinion on issues such as station improvements and proposed extensions. RIPTA can work with community partners to host language specific meetings. For example, meetings can be held for specific populations in Spanish-only and Portuguese-only.

13. Telephone Information and Comment Line

All RIPTA Customer Service Agents have access to Voiance Language Services, which is an over-the-phone interpretation (OPI) service. The service allows RIPTA Customer Service Agents to call Voiance when a customer is unable to speak English. The professionally trained and tested OPI interpreters listen to the customer, analyze the message and accurately convey its original meaning to the RIPTA staff member, then respond to the customer in his/her own language. Voiance offers interpretation in over 170 languages.

D. RIPTA's Ongoing Public Participation Methods

RIPTA will continue to promote and enhance the use of its ongoing public participation methods to reach out to low income, minority and LEP populations. RIPTA is committed to reducing the barriers encountered by LEP persons in accessing its services and benefits, to the extent resources are available.

RIPTA will conduct proactive outreach to expand the reach, inclusivity and effectiveness of these ongoing methods. Examples of these existing methods include:

- RIPTA website (www.ripta.com);
- RIPTA Facebook page;
- RIPTA communications via Twitter;
- Regular newsletters/flyers distributed through RIPTA stations and bus stops;
- Regular communications with media;
- RIPTA Board meetings;
- Focus groups;
- Partnerships with Community Based Organizations;
- Digital boards and televisions;
- Communication with elected officials;
- Press briefings and news releases;
- Regular emails to community members;
- Participation in community fairs and festivals;
- Sponsorship of major community events;
- Passenger bulletins in stations;
- Educational tours and briefings;
- Voiance Over the Phone Interpretation (OPI) Service;
- Language interpreters at public meetings;
- Written language assistance services

PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

In its public outreach efforts RIPTA works to involve customers and the general public, including the minority, low-income, and LEP populations. RIPTA utilizes a variety of approaches to communicate with interested parties and members of the public at large, and the agency is continually working to improve its outreach.

Over the past three years, we have worked on a variety of projects that have involved public outreach and examples are below.

Outreach for RIPTA Fare Study

In the fall of 2015, RIPTA conducted a Fare Study in order to: (1) identify challenges related to RIPTA’s fare payment system; (2) evaluate the overall effectiveness of this system; (3) assess the capabilities of existing equipment and the potential to introduce new technologies; and (4) recommend changes and policies to make the system more efficient to operate and more convenient to riders across the state. Public outreach included the following:

- Media release issued to press;
- Passengers notified via social media and e-newsletter;
- Onboard digital ads, in both English and Spanish, were displayed on all buses;
- RIPTA.com was updated with the Fare Study information;
- Public hearing notices were posted approximately 14 days in

advance of the hearings on the RIPTA website and in local newspapers in English and Spanish. Notices were also posted at RIPTA stations and were distributed on vehicles;

- In November 2015, twelve public hearings were held in Bristol, Providence, South Kingstown, Warwick, Newport, Woonsocket and Pawtucket, thus covering all five Rhode Island counties;

Outreach for RIPTA Fare Increase: Based on the Fare Study, RIPTA increased fares and introduced a new fare product on March 1, 2016. Public outreach included the following:

- Media release issued to press;
- Passengers notified via social media and e-newsletter;
- Onboard digital ads, in both English and Spanish, were displayed on all buses;
- RIPTA.com was updated with the fare information.
- Placed radio advertisements in English, Spanish and Portuguese (Someone needs to confirm dates and stations);
- Displayed counter cards, in English and Spanish, at sales outlets to announce new RIde Fare product for paratransit passengers;

Outreach for Newport Transportation and Visitors Center Repair and Restoration:

Starting in mid-2015, RIPTA began design work on the roughly \$6 million repair and restoration of the exterior the visitors' center which had been badly damaged by Hurricane Sandy. Public outreach included the following:

- Media releases issued to press at key points in the project;
- Worked closely with Newport City officials to ensure that residents were kept up to date on the project;
- Created Design Review Committee consisting largely of representatives of Newport;
- Provided information to RIPTA's State Transportation Advisory Committee;
- Presented Project information to RIPTA's Accessible Transportation Advisory Committee (ATAC) on October 22, 2015;
- ATAC site visit conducted;
- Site visit conducted with representative of Governor's Commission on Disabilities;
- Worked with the community group called Alliance for a Livable Newport;
- (ALN) for further community outreach. Working with ALN, held two Community meetings in 2015 and 2016;
- Worked with State Legislators representing the area to make sure all constituent questions were answered;
- Worked with Rhode Island Department of Transportation to ensure that

public alerts were sent when construction work or temporary bus berthing affected Newport roads;

- Presented public updates at Newport City Council meetings
- RIPTA.com was updated with project updates Passengers notified of project updates via social media and e-newsletter;

Outreach for Pass Requalification Process for Passengers in Free Fare Program: In April 2016, RIPTA began a requalification process for the nearly 15,000 passengers enrolled in its no fare program for low-income seniors and persons with disabilities. Public outreach included:

- Media releases issued to press;
- Passengers notified via social media and e-newsletter;
- Staffed bilingual employees at requalification offices in Kennedy Plaza and at RIPTA Headquarters, 75 Elmwood Avenue;
- Shared information with community groups such as the RI Community Organizing Project;
- Placed Spanish advertisements in the *Nuevos Horizontes* newspaper in March and July 2016;
- Placed English advertisements in the *Senior Digest* and the *Providence Journal* in March and July 2016;
- Placed radio advertisements in English, Spanish and Portuguese on at least six local radio stations in the following time blocks: 4/4/2016 to 6/26/2016, 7/18/2016 to 9/1/2016, and from 11/28/2016 to 12/25/2016;
- Onboard digital ads were displayed on all buses;
- Distributed flyers, in English and in Spanish, at numerous public and community sites across the state, including: meal sites, senior centers, city and town halls, public libraries;

Outreach for Bus Stop Design Guide: In 2016, RIPTA worked with the Rhode Island Department of Transportation in creating a bus stop design guide to standardize bus stop features and inform the state and municipalities when working on roads. Public outreach included:

- Three public informational meetings in the north, south and central regions of the state held on June 9, June 15, and June 20, 2016;
- Presentation and discussion with RIPTA's Accessible Transportation Advisory Committee (June 2016);
- Communication with various stakeholder groups including, municipal officials, RI Governor's Commission on Disabilities, RIPTA Riders Alliance, GrowSmart RI, Coalition for Transportation Choice, and business leaders;
- Media release issued to press;
- Passengers notified via social media and e-newsletter;
- Onboard digital ads were displayed on buses;

- RIPTA.com was updated with the Bus Stop Design Guide information.

Outreach for Proposed Service Changes: In April 2016, RIPTA announced it would make cost neutral changes to Bus Routes 32, 33, 34, 35, 40, 50, 52, 58, 78 and 92. Public outreach included the following:

- Media release issued to press;
- Passengers notified via social media and e-newsletter;
- Onboard digital ads, in both English and Spanish, were displayed on all buses;
- RIPTA.com was updated with the proposed changes;
- Public hearing notices were posted approximately 14 days in advance of the hearings on the RIPTA website and in local newspapers in English and Spanish. Notices were also posted at RIPTA stations and were distributed on vehicles;
- In April 2016, four public hearings were held in East Providence and Providence.

Outreach for Customer Satisfaction Survey: In 2015 and 2016, RIPTA invited customers to take the annual American Bus Benchmarking Group (ABBG) Customer Satisfaction Survey, available online in English and Spanish. The survey dates were from Monday, April 13 through Sunday, May 10, 2015, Monday; April 4 through Sunday, May 1, 2016; and again Monday, April 24 – Sunday, May 21, 2017. Surveys like these help RIPTA better understand its customers’ opinions of existing service and priorities areas that need improvement. Public outreach included the following:

- Onboard digital ads, in both English and Spanish, were displayed on all buses;
- RI Organizing Project was contacted for help in reaching diverse populations.
- RIPTA generated printed copies of survey for distribution at meal sites and community centers. Printed copies in English and Spanish were also available at RIPTA Customer Service stations at 705 Elmwood Ave., Providence;
- RIPTA.com was updated with the survey information;
- Media release issued to press;
- Passengers and community partners notified via social media and e-newsletter;
- Surveys in English and Spanish were distributed onboard and at bus stations.

Outreach for Updating Rhode Island’s Coordinated Public Transit/Human Services

Plan: In 2017, RIPTA began work on updating the State’s human services transportation plan per federal regulations. The Coordinated Plan is intended to identify the

transportation needs of senior Citizens, persons with disabilities, and low-income individuals. Public outreach included:

- Press releases to media;
- Coordination with advocacy groups and service providers including senior centers, health care providers, community health organizations, disability service providers, community organizers, and community action agencies as well as the Governor’s office, RI Department of Health and Human Services, RI Office of Veterans Affairs, RI Department of Elderly Affairs, Governor’s Commission on Disabilities;
- Stakeholder meetings;
- Public meetings across the state: July 11, 2017 in South Kingstown, July 13, 2017 in Cranston, July 18, 2017 in Newport, July 20, 2018 in Pawtucket;
- Meeting Invitations sent to elected officials for distribution to constituents;
- Email blasts, meeting invites, and surveys distributed to more than 150 stakeholders;
- Project information and updates on www.ripta.com;
- Postings on social media;

Outreach for Veterans Pilot Pass Program: In May 2017, RIPTA and the Rhode Island Office of Veterans Affairs (RIOVA) announced a new pilot bus pass program for local veterans. This limited pilot “Veterans Bus Pass Program” will provide qualified U.S. military veterans with free, unlimited rides on RIPTA’s fixed-route buses through the end of 2017. Public outreach included the following:

- Digital signage posted on board all RIPTA buses;
- RIPTA.com was updated with the program information;
- Media release issued to press;
- Provided Information to the Rhode Island Office of Veterans Affairs for use in targeted email blasts to their various veterans’ communities;
- Passengers and community partners notified via social media and e-newsletter;

CHAPTER THREE

DEMOGRAPHIC DATA & MAPS

DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

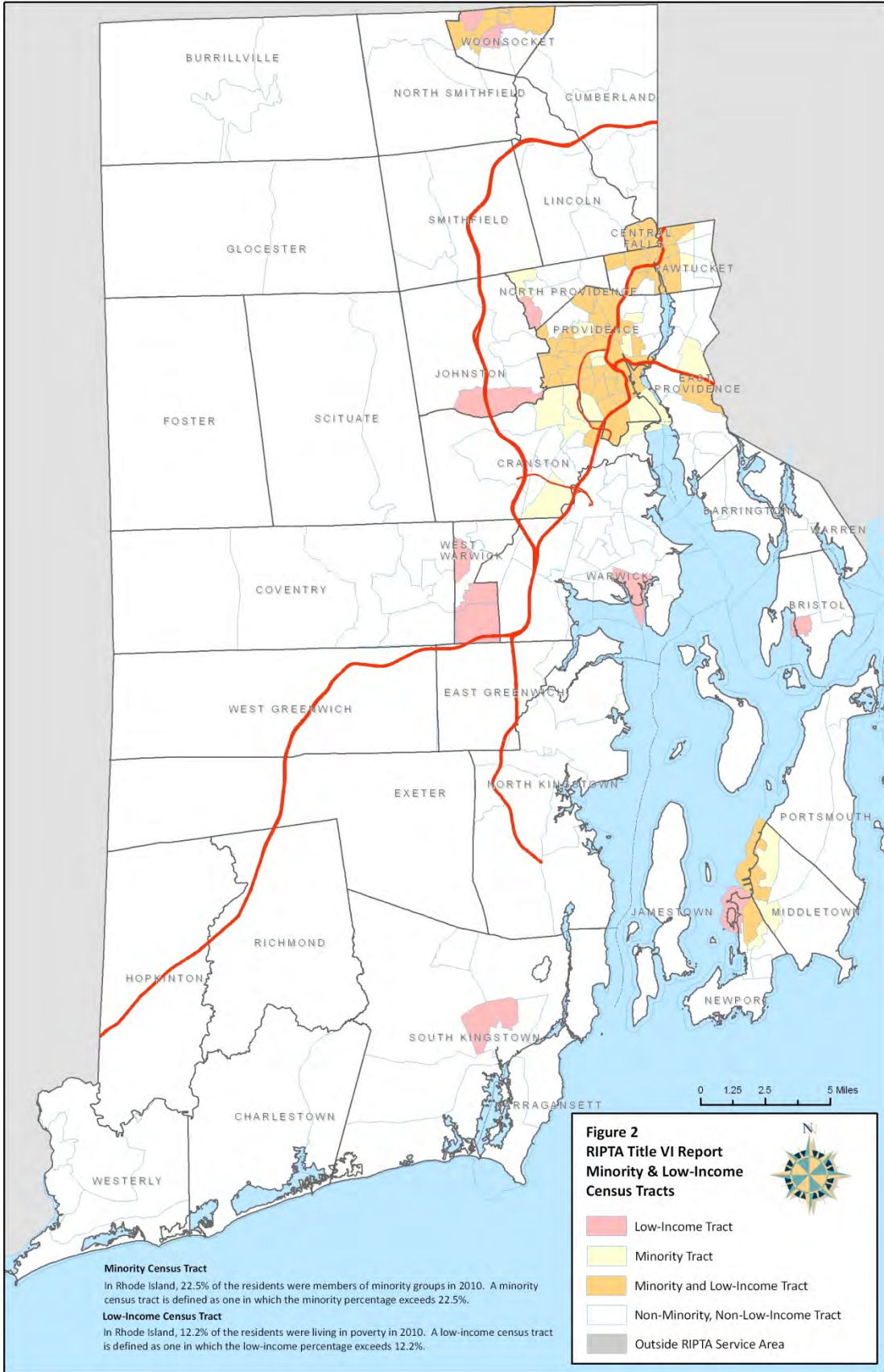
In 2010, the U.S. Census identified 1,052,567 residents in Rhode Island. Rhode Island's minority population includes African Americans, Asians, American Indians and Alaskan Natives, Pacific Islanders, people of Hispanic or Latino origin, other non-white races, and persons of two or more races. In Rhode Island, 22.5% of the residents were members of minority groups in 2010.

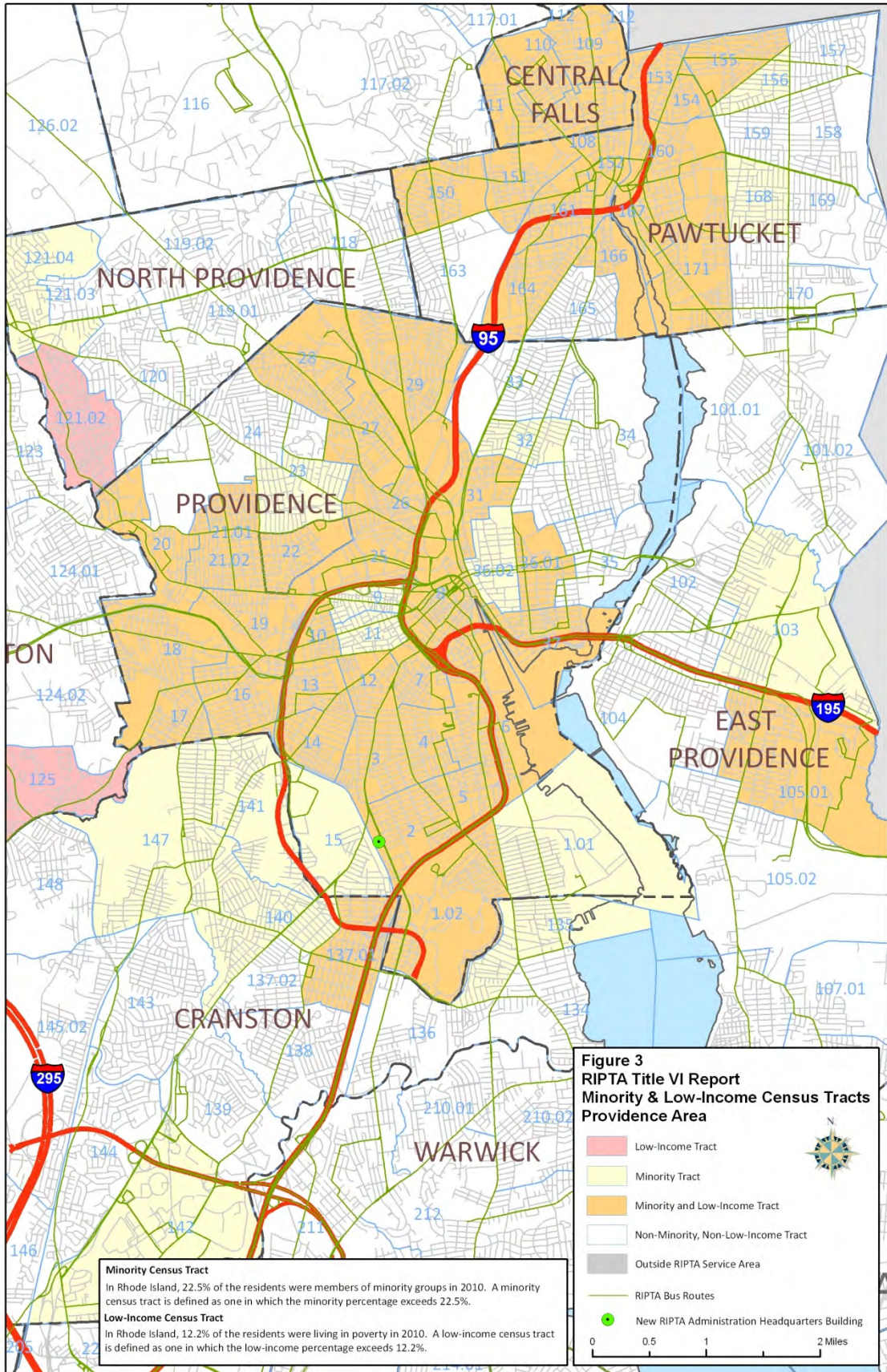
The 2010 Census shows that 12.2% of Rhode Island families are living in poverty. Figure 2 below illustrates all of the census tracts in the state that have a poverty rate of 12.2% or higher and/or a minority population of 22.5% or higher. Most of the minority and low-income population are concentrated in the Providence metropolitan area, Newport and Woonsocket. These are also localities that receive the bulk of RIPTA services.

The following maps show the distribution of minority and low-income populations in Rhode Island:

1. Figure 1: Base Map
2. Figure 2: Minority and Low-Income Census Tracts
3. Figure 3: Minority and Low-Income Census Tracts, Providence Area







DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS

In 2016, RIPTA conducted an on-board survey of 6,799 riders. Questions were asked regarding customer satisfaction, rider frequency, fare type used, origin and destination, transfer activity, as well as demographics, including household income, age, gender, race/ethnicity, and language spoken at home.

This survey report can be viewed at Appendix, Exhibit F.

MINORITY REPRESENTATION ON PLANNING BODIES AND ADVISORY BODIES

The Rhode Island Accessible Transportation Advisory Committee (ATAC) is expected to assist RIPTA's management with its compliance with all applicable provisions of the America with Disabilities Act (ADA) and other civil rights laws as they apply to public transportation systems in Rhode Island.

Any person who has a disability or who represents an organization concerned with disability issues can be an ATAC member. Membership is established at the first ATAC meeting of the year; new members are voted in by the ATAC.

To encourage membership of minorities to this committee RIPTA has utilized its website and email list. The committee currently has 22 members including an African American male. To bring more diversity to the ATAC, RIPTA will continue to assist in the recruitment for potential members from minority groups by reaching out to our community partners and also to groups who serve the disabled community.

SUBRECIPIENT COMPLIANCE

RIPTA currently has no subrecipients. During the 2016-2018 period RIPTA had one subrecipient, the Rhode Island Department of Transportation (RIDOT). As a direct recipient of FTA funds, RIDOT submits its own Title VI plan directly to the FTA. Final expenditure on this subrecipient contract was made on June 20, 2016.

CHAPTER FOUR

SERVICE STANDARDS AND POLICIES

SYSTEMWIDE SERVICE STANDARDS

To prevent discriminatory service design or operation, the FTA circular requires transit agencies to adopt system-wide service standards for vehicle load, vehicle headway, on-time performance, and service availability.

VEHICLE LOADING

RIPTA will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods and for service that operates for long distances, service will be designed to try to provide a seat to all customers.

Two different techniques are used to keep passenger loads within acceptable levels. The first is to match vehicle types with ridership levels, and to use larger vehicles on higher ridership routes. The second method is to provide more frequent service, with service frequencies set to keep passenger loads within the limits presented in Table 1.

The vehicle load standard is calculated on the basis of an average for the both the peak and off-peak periods, at the busiest point on the route. For instance, if a service operates at 15-minute frequency, then four buses would pass the busiest point in an hour. The average number of passengers for these four buses must fall within the service standards, even though any one bus may be more crowded than the average. If the standard is exceeded for the average calculation, RIPTA will consider more frequent service or larger vehicles to improve the situation.

TABLE 1 | AVERAGE VEHICLE LOADING MAXIMUMS

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS	FLEX
Average Maximum Passenger Loading (as a percentage of seating capacity)							
Peak	120%	120%	120%	120%	100%	100%	100%
Off-Peak	100%	100%	100%	100%	100%	—	100%

Note: Maximums are averages over one-hour periods; individual trips may exceed averages.

TABLE 2 | VEHICLE CAPACITIES

	60' ARTICULATED BUS	RAPID BUS	40' BUS	35' BUS	35' TROLLEY	FLEX VEHICLE
100% of Seating Capacity	55	36	36	28	28	16
120% of Seating Capacity	66	43	43	34	34	n/a

Note: RIPTA does not currently operate articulated vehicles, but may do so in the future.

MINIMUM SERVICE FREQUENCIES

Service frequency (the time interval between two vehicles traveling in the same direction on the same route) has a major influence on transit ridership; high frequency service is often considered a key characteristic for attractive service. At the same time, frequency has a significant impact on operating costs, and service requirements increase exponentially with improvements in service frequency.

Because of the expense of high frequency service, transit service frequency is normally based upon existing or potential demand. This often translates into variations in service frequency throughout the day, with higher frequency in peak periods, and less frequent service outside of the peak.

In general, frequencies are established to provide enough vehicles past the maximum load point(s) on a route to accommodate the passenger volume and stay within recommended loading standards. Minimum service frequency guidelines are presented in Table 3. Note that when a corridor is served by multiple routes, effective service frequencies in the corridor would be more frequent than those for individual routes. For certain routes serving outlying areas of the state, service areas may be reduced to maintain satisfactory farebox recovery ratios. As with all standards, this service frequency matrix should be considered a guide, not an absolute measure.

TABLE 3 | MINIMUM SERVICE FREQUENCY GUIDELINES (MINUTES)

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
Weekdays							
Early AM	30	30	60	60	60	—	n/a
AM Peak	10	15	30	60	60	3 trips	n/a
Midday	10	20	60	60	60	—	n/a
PM Peak	10	15	30	60	60	3 trips	n/a
Night	30	30	60	60	120	—	n/a
Saturdays							
All Day	15	30	60	60	—	—	n/a
Sundays							
All Day	15	30	60	60	—	—	n/a

Note: “—” indicates that the guideline does not apply. Also, the guidelines apply to services that are provided, and do not imply that all services will be provided at all times.

Clock-face service intervals (e.g. every 10, 12, 15, 20, 30 or 60 minutes) are easier for passengers to remember and can help facilitate better transfer connections between routes. Whenever possible, frequencies should be set at regular clock-face intervals. However, there are two key exceptions:

- Where individual trips must be adjusted away from clock-face intervals to meet shift times, work times, transfer connections, or other special circumstances; and
- Where the desired frequency of service causes round trip recovery time to exceed 20% of the total round trip vehicle time, leading to inefficient service.

ROUTES SHOULD OPERATE ALONG A DIRECT PATH

Passengers and potential passengers alike prefer faster, more direct transit services. In RIPTA’s quest to remain competitive with the automobile, special attention should be placed on designing routes to operate as directly as possible to maximize average speed for the bus and minimize travel time for passengers while maintaining access to service. Routes should not deviate from the most direct alignment unless there is a compelling reason. Directness of service is affected by a series of factors, some under RIPTA’s control, and others due to the environment in which service operates. Some of these factors include:

SERVICE FACTORS WITHIN RIPTA’S CONTROL

- Directness of individual routes (meandering)
- Connectivity throughout route network (transfers)
- Operating characteristics (number of stops, express/local operation, etc.)

ENVIRONMENTAL FACTORS BEYOND RIPTA’S CONTROL

- Traffic congestion
- Geography
- Accessibility of streets from adjacent areas
- Street geometry and turning movements
- Traffic signals and controls

ROUTE DEVIATIONS SHOULD BE MINIMIZED

As described above, service should be relatively direct. The use of route deviations—the deviation of service off of the most direct route—should be minimized.

However, there are instances when the deviation of service off of the most direct route is appropriate, for example to avoid a bottleneck or to provide service to major shopping centers, employment sites, schools, etc. In these cases, the benefits of operating the route off of the main route must be weighed against the inconvenience caused to passengers already on board. Route deviations should be implemented only if:

1. The deviation will result in an increase in overall route productivity.
2. The number of new passengers that would be served is equal to or greater than 25% of the number of passengers who would be inconvenienced by the additional travel time on any particular deviated trip.
3. The deviation would not interfere with the provision of regular service frequencies and/or the provision of coordinated service with other routes operating in the same corridor.

In most cases, where route deviations are provided, they should be provided on an all-day basis. Exceptions are during times when the sites that the route deviations serve have no activity—for example route deviations to shopping centers do not need to serve those locations early in the morning before employees start commuting to work.

ON-TIME PERFORMANCE

On-time performance is a measure of runs completed as scheduled. RIPTA measures on-time performance at every timepoint, on every trip, every day, barring equipment malfunctions. On-time performance is reported and evaluated by route. Due to unavoidable variability in conditions, a bus will be considered on-time if it passes a timepoint between 1 minute early and 5 minutes late. RIPTA strives for the best on-time performance possible, but we will view a bus route to be meeting minimum on-time performance standards if it meets or exceeds the average on-time performance of a group of peer agencies known as the American Bus Benchmarking Group (ABBG). Currently, the ABBG average is 79% on-time, though this number will adjust over time.

SERVICE COVERAGE

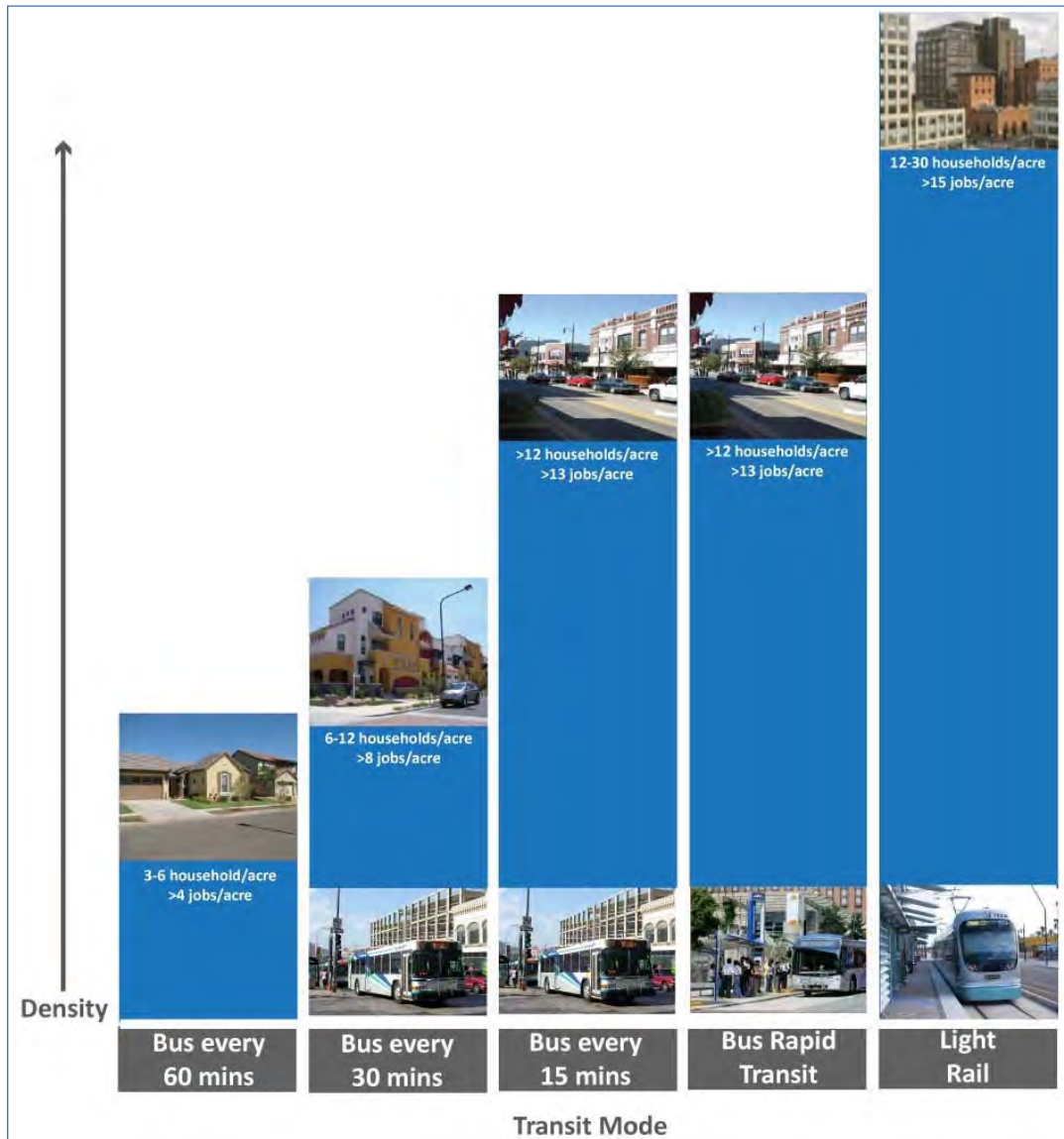
RIPTA's enabling legislation provides RIPTA with the authority to operate transit service throughout Rhode Island. As the state's designated Mobility Manager, RIPTA receives many requests for service from citizens who are not within walking distance of any route, or who desire that existing routes be expanded to serve new destinations. Transit cannot be effective and productive in all environments, but RIPTA does strive to provide service in all transit-supportive areas.

Population and employment densities are one of the strongest indicators of potential transit demand. Figure 1 on the following page provides a general guideline for where different levels of transit service may be warranted. Once densities begin to exceed three to six households per acre or four jobs per acre, fixed route bus services may be viable. More densely developed areas may warrant higher levels of transit service.

Population and employment density should be used to evaluate the potential for service. If densities are relatively high along a continuous corridor, or if the corridor connects major activity centers or hubs, a higher level of service may be warranted. If densities meet the minimum guidelines, but only exist in small or scattered areas, travel demand may not be sufficient to support transit. Or, a lower level of transit – such as Flex or on-demand services – may be warranted.

Other factors must also be considered when deciding whether an area can support productive transit service. These include demographic data within the corridor, such as the number of transit dependent individuals and household incomes. State goals, including whether the area falls within RI's designated growth boundary or is a designated activity center, should be considered. Other local conditions, such as the cost of parking, can increase transit demand. Note that these guidelines only apply to the evaluation of potential service; existing service should not be evaluated with these service coverage guidelines.

FIGURE 1 | TRANSIT SUPPORTIVE POPULATION AND EMPLOYMENT DENSITIES



Source: Composite data compiled by Nelson\Nygaard from various sources.

STOPS SHOULD BE SPACED APPROPRIATELY

The distance between stops is of key concern to RIPTA. More closely spaced stops provide customers with more convenient access as they are likely to experience a shorter walk to the nearest bus stop. However, transit stops are also the major reason that transit service is slower than automobile trips, since each additional stop with activity requires the bus to decelerate, come a complete stop, load and unload riders, and then accelerate and re-merge into traffic. Since most riders want service that balances convenience and speed, the number and location of stops is a key component of determining that balance.

RIPTA provides different types of transit services that are tailored toward serving different types of trips and needs. In general, services that emphasize speed (e.g. Rapid Bus or Express routes) should have fewer stops, while services that emphasize accessibility should have more frequent stops.

The minimum stop spacing (or maximum stops per mile) are shown in Table 4. Where multiple routes operate in the same corridor, the standard for the higher service type applies. Express/commuter services are not required to serve every stop in a corridor. Exceptions to these guidelines should only be made in locations where walking conditions are particularly dangerous, significant topographical challenges impede pedestrian access, and factors compromise safe bus operations and dwelling.

TABLE 4 | BUS STOP SPACING GUIDELINES

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
Minimum Stop Spacing (feet)							
Moderate to High Density Areas	1,100	900	900	660	900	900	n/a
Low Density Areas	1,300	1,300	1,300	1,100	1,100	1,100	n/a
Maximum Stops per Mile							
Moderate to High Density Areas	5	6	6	8	6	6	n/a
Low Density Areas	4	4	4	5	5	5	n/a

Notes: Moderate to high density = greater than or equal to 4,000 persons per square mile; low density = less than 4,000 persons per square mil

SYSTEMWIDE SERVICE POLICIES

The FTA circular requires system-wide service policies for vehicle assignment and distribution of transit amenities. Policies differ from standards in that policies are not necessarily based on a quantitative threshold.

DISTRIBUTION OF TRANSIT AMENITIES

The FTA circular defines transit amenities as items of comfort, convenience, and safety that are available to the general riding public. FTA requires RIPTA to set policy to ensure equitable distribution of transit amenities across the system. The circular requires that RIPTA maintain service policies for the distribution of various transit amenities, including seating, bus shelters, provision of information, escalators, elevators and waste receptacles. The following policies address how amenities are distributed within RIPTA’s system.

a. Seating

All of RIPTA’s shelters have benches. RIPTA does not have a program to provide benches at other bus stops.

b. Bus Shelters

A major concern of transit riders, especially regarding inclement weather, is the amount of time spent on the street exposed to the elements. The abundance of cold and windy conditions is of particular concern in Rhode Island.

The placement of shelters and the development of a priority location program will be based on the number of boarding and/or transferring passengers at a specific stop. Shelters should be provided at all stops which serve 100 or more boarding and/or transferring passengers or which serve concentrations of elderly or handicapped residents.

Additional guidance for bus shelters is provided in the new Bus Stop Design Guide, completed in April 2017 in cooperation with the Rhode Island Department of Transportation. This new document establishes clear guidance on how to consider and better integrate transit into the roadway network throughout the state, and improve bus operations and the passenger experience at bus stops.

c. Provision of Information

Timetables are provided at all transit hubs in the RIPTA system. RIPTA does not provide timetables at other bus stops.

d. Escalators

RIPTA does not have any escalators located at fixed guideway stations.

e. Elevators

RIPTA does not have any elevators located at fixed guideway stations.

f. Waste Receptacles

RIPTA provides waste receptacles at all transit hubs. RIPTA does not have a program to provide waste receptacles at other bus stops.

VEHICLE ASSIGNMENT

Vehicle assignment refers to the process by which vehicles are placed into service throughout the system. Vehicles are assigned to routes based on ridership demands, with newer vehicles being rotated across all routes. The age and quality of vehicles assigned to routes will not be determined on the basis of race, color, or national origin.

Specific vehicles may be assigned to routes when required by operating conditions, such as cases where a smaller bus is required to provide service on narrower streets, and in instances where a bus has special branding for a specific route or service type. In addition, hybrid buses, which operate more efficiently in an urban setting, whenever possible, will be assigned to routes in which the majority of the route miles are located within urban areas on local streets, characterized by frequent stopping, as opposed to being used on Express routes and other routes that operate on highways or rural areas with few stops.

CHAPTER FIVE

SERVICE AND FARE CHANGES

SERVICE CHANGE EQUITY ANALYSIS

It is the policy of RIPTA to assess the potential for discriminatory impacts of service changes, to conduct equity analyses, and to mitigate negative impacts appropriately.

Determining When an Equity Analysis is Needed

Major Service Changes

Major service changes are evaluated to determine whether they will result in a disparate impact on minority riders or a disproportionate burden on low-income riders. RIPTA defines major service changes as the following:

1. The establishment of new transit lines
2. Within an 18 month period, cumulative increases or decreases of more than 25% in the annual transit revenue vehicle miles operated on a corridor
3. Within an 18 month period, cumulative increases or decreases of more than 25% in the annual number of service hours scheduled on a corridor

Rationale: In establishing this definition, RIPTA considered the nature of service provided throughout its statewide system, and the manner in which service changes are implemented. RIPTA conducts ongoing service monitoring, and pursuant to this monitoring implements incremental service changes that tend to be relatively small, rather than sweeping and bold. In order to protect riders from the incremental erosion of service over time – for instance on a low-performing route – it was decided that the cumulative impact of changes should be tracked over an 18-month period to ensure that a series of relatively small changes do not result in major changes over time. Because RIPTA’s service guidelines consider service hours and vehicles miles in monitoring service, these units were selected to ensure accountability and consistency in the service modification and monitoring process.

A 25% threshold was selected based on a review of RIPTA routes in terms of service span, frequency, service miles, service hours, and the number of vehicles being operated on each route. This threshold allows for flexibility in implementing periodic, minor service changes based on evolving passenger demands, demographics, and economic development opportunities, while ensuring RIPTA’s accountability for changes resulting

in greater impacts to passengers. The 25% threshold protects both equity and RIPTA's ability to make simple service adjustments designed to maximize route productivity.

Exceptions: major service changes exclude changes to service that are caused by:

1. Discontinuance of a temporary or demonstration service change that has been in effect for less than 180 days;
2. Routine seasonal service changes, such as modifications to accommodate student ridership;
3. An adjustment to service levels for new routes that have been in revenue service for less than one year (allowing RIPTA to respond to actual ridership levels observed on those new routes);
4. Acts of other governmental agencies;
5. Forces of nature, such as flooding and earthquakes;
6. Failures of infrastructure such as bridges, tunnels, or highways; and
7. A reduction in transit revenue vehicle miles on one route that is offset by an increase in revenue vehicle miles on the overlapping section of another route

Adverse Effect

Once a major service change has been identified, potential adverse impacts are considered to determine whether an Equity Analysis must be conducted. Potential adverse impacts include span of service reductions, frequency reductions, re-routing, and route or route segment eliminations.

For the purposes of this policy, RIPTA considers an adverse effect to be a geographical or time-based reduction in service impacting more than 20 passengers that includes:

1. Span of service reductions of more than one hour total;
2. Frequency reductions of more than fifty percent (50%);
3. Route segment eliminations that results in a walk of over 1/2-mile to the nearest bus stop from the former stop;
4. Re-routing that results in a walk of over 1/2-mile to the nearest bus stop from the former stop; and
5. Route elimination.

Based on input from affected communities, RIPTA may conduct an equity analysis on a service change anticipated to generate adverse effects below the thresholds noted above.

EQUITY ANALYSIS

Disparate Impact Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations.

A disparate impact for a major service change occurs when more than 62.2% of the population bearing adverse effects belongs to minority groups. This policy is designed to reflect populations that meaningfully exceed RIPTA's system-wide average of 52.2% minority ridership, based on 2016 rider survey data. Minority routes are as follows:

MINORITY ROUTES	
Route	Minority Percent
6	73.9%
11 / R Line	64.4%
17	64.7%
18	78.7%
34	65.0%

In the course of performing a Title VI Equity Analysis, RIPTA analyzes how a proposed action would impact minority as compared to non-minority populations. In the event a proposed action has a negative impact that affects minorities more than non-minorities, with a disparity that exceeds the above disparate impact thresholds, RIPTA evaluates whether there is an alternative that has a more equitable impact. Otherwise, RIPTA will take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished by a less burdensome alternative.

When service to multiple routes is being changed, RIPTA will either (a) evaluate the proposed changes in the aggregate, if the routes are geographically proximate or otherwise interconnected; or (b) conduct a separate equity analysis for each route, if service changes to one will not generate adverse impacts to the other(s).

Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations.

RIPTA defines a disproportionate burden as occurring when more than 79.2% of the population bearing adverse effects belongs to low-income groups. This policy is designed

to reflect populations that meaningfully exceed RIPTA's system-wide average of 69.2% low-income individuals, based on 2016 rider survey data.

Finding of Disparate Impact or Disproportionate Burden

If the equity analysis determines that proposed service changes will create a disparate impact on minority populations or a disproportionate burden on low-income populations, RIPTA will consider modifications to the changes and analyze the modified proposals to determine whether a non-discriminatory or less discriminatory option exists.

To keep affected populations and the general public informed of and engaged in this process, RIPTA will provide public notice of any finding of disparate impact or disproportionate burden, and will solicit suggestions and feedback regarding (1) modifications and alternatives under consideration; and (2) measures that may be implemented to mitigate against the negative impacts for the changes.

RIPTA's board of directors may elect to approve service changes even when these changes will create disparate impacts or disproportionate burdens. In approving a change that creates a disparate impact, RIPTA must clearly demonstrate that (a) there is a substantial legitimate justification for the proposed service change; AND (b) no alternatives are available that would have a less disparate impact on minority riders while also accomplishing RIPTA's legitimate program goals. RIPTA must adopt the least discriminatory alternative available.

Implementing Service Changes

In implementing service changes that will have a disparate impact or disproportionate burden, RIPTA will seek to mitigate the negative impacts of these changes on minorities and low-income individuals to the maximum extent possible, incorporating into its mitigation efforts the input received during the above-referenced public engagement process.

FARE CHANGE EQUITY ANALYSIS

It is the policy of RIPTA to assess the potential for discriminatory impacts of fare structure changes or changes in fares by fare payment method, to conduct equity analyses, and to mitigate negative impacts appropriately.

Determining When an Equity Analysis is Needed

To determine whether a fare change would have a discriminatory impact on the basis of race, color or national origin, RIPTA first determines if the proposed change includes a change in the fare structure or a change in fares by fare payment method.

Any proposal that involves a change to fare structure or to relative fares by fare payment method is assessed to determine whether it would have a disparate impact on minority riders or a disproportionate burden on low-income riders.

A fare change that results in a differential percentage change of greater than 10% by customer fare category or payment method is evaluated to determine whether it would have a disparate impact on minority riders or a disproportionate burden on low-income riders. For instance, an increase on cash fare payment compared to monthly passes of 10% or more would be evaluated to determine whether it would have a disparate impact or a disproportionate burden.

Exceptions: (1) promotional fare reductions lasting no longer than six months; (2) temporary fare reductions mitigating construction or other activities disrupting rider travel patterns; and (3) declared “fare free” days such as Air Quality Alert days.

Equity Analysis

If the average percentage fare increase for minority riders is five percentage points or more higher than the average percentage fare increase for non-minority riders, the fare change would be determined to have a disparate impact. Similarly, if the average percentage fare increase for low-income riders is five percentage points or more higher than the average fare increase for non- low-income riders, the fare change would be determined to have a disproportionate burden.

RIPTA will conduct the following steps in accordance with this policy:

1. Determine the number and percentage of overall riders, minority and low-income users of each fare category being changed;
2. Review current fares vs. proposed fare change;
3. Compare the statistical percentage differences for each particular fare media between minority users and overall users; and
4. Compare the statistical percentage differences for each particular fare media between low-income users and overall users.

Alternatives Analysis:

Alternative fare payment methods or fare media available for individuals affected by the proposed changes will be presented and analyzed. This analysis will compare the fares

paid by the proposed changes with fares that would be paid through available alternatives, and will provide the location of fare media distribution points relative to that of impacted populations.

Finding of Disparate Impact

If the equity analysis determines that proposed fare changes will have a disparate impact on minority populations, RIPTA will consider modifications to the changes and analyze the modified proposals to determine whether a non-discriminatory or less discriminatory option exists.

To keep affected populations and the general public informed of and engaged in this process, RIPTA will provide public notice of any finding of disparate impact and will solicit suggestions and feedback regarding (1) modifications and alternatives under consideration; and (2) measures that may be implemented to mitigate against the negative impacts for the changes.

RIPTA's board of directors may elect to approve fare changes even when these changes will have a disparate impact on minorities. In so doing, RIPTA must clearly demonstrate that (a) there is a substantial legitimate justification for the proposed fare changes, AND (b) an alternatives analysis shows that the proposed changes are the least discriminatory alternative. RIPTA must adopt the least discriminatory alternative available.

Implementing Fare Changes

In implementing fare changes that will have a disparate impact or disproportionate burden, RIPTA will seek to mitigate the negative impacts of these changes on minorities and low-income individuals, incorporating into its mitigation efforts the input received during the above-referenced public engagement process. Mitigation measures may include adjusting the timing of fare increases, providing discounts on passes to social service agencies that serve the impacted populations, or other measures as appropriate.

PUBLIC INVOLVEMENT

RIPTA developed the policies detailed in this chapter with the participation of members of Rhode Island's minority, low income, and LEP communities. The thresholds and data sets were initially identified by RIPTA technical staff, then thoroughly vetted through a public process that included a formal public comment period and a Community Leadership Group Workshop.

Because of the complexity of these SAFE policies and procedures, RIPTA developed a comprehensive agenda for its Community Leadership Group Workshop to meaningfully engage key organizational representatives in the policy development and approval process.

On August 4, 2015, RIPTA held its Community Leadership Group Workshop. The objectives of this workshop were to (1) spread the word about Title VI protections; (2) explain the requirement to conduct service and fare equity (SAFE) analyses; (3) present the draft SAFE policies; (4) discuss whether the process or process should be modified in any way; and (5) seek general comment and input regarding RIPTA's equity program.

Eleven community organizations that represent Rhode Island's minority and Limited English Proficient communities and a significant percentage of its low-income population were invited to the workshop. Those organizations were:

- 1) Dorcas International
- 2) Progreso Latino
- 3) Latino Policy Institute
- 4) Center for Southeast Asians
- 5) African Alliance of Rhode Island
- 6) Cape Verdean Community Development (CACD)
- 7) Narragansett Indian Tribe
- 8) Community Action Partnership of Providence
- 9) East Bay Community Action Program
- 10) Unified Solutions
- 11) NAACP Providence Branch

Despite several meeting reminders to the eleven organizations invited, representatives of just three organizations attended the workshop:

- 1) Dorcas International
- 2) Progreso Latino
- 3) East Bay Community Action Program

Dorcas International is Rhode Island's lead organization serving refugees, and works with all of our Limited English Proficiency (LEP) communities. Progreso Latino is Rhode Island's premier social service agency serving primarily Latinos. East Bay Community Action Plan is Rhode Island's largest community action program servicing up to 33% of the state's low income population including significant Portuguese, Cape Verdean and African American populations.

RIPTA staff present at the workshop were the Executive Director of Planning and the Compliance Officer/ Title VI coordinator.

The group was informed that under Title VI, transit authorities were now required to have “disparate impact” and “disproportionate burden” policies developed before initiating major service changes or fare increases. Disparate impact and disproportionate burden were defined. The draft policies established thresholds and data sets to determine when impacts of major service changes and fare changes disproportionately and adversely affect minority and low income populations. RIPTA was seeking community feedback prior to the thresholds and policies being adopted. A number of questions were addressed including how organizations representing minority and low-income populations could be engaged in the ongoing SAFE analyses so as to better understand impacts. Subsequent to the workshop, RIPTA received additional feedback from Dorcas International and the Cambodian Society of Rhode Island.

RIPTA is committed to maintaining an ongoing relationship with the organizations, including sharing SAFE analyses of any major service or fare changes as part of the public comment period. RIPTA will continue to host Community Group Leadership trainings. The next one be held this spring.

RIPTA’s Board of Directors adopted the SAFE policies and procedures at its June 2016 meeting (Appendix, Exhibit G).

SERVICE AND FARE CHANGE EQUITY ANALYSES

See Appendix, Exhibit H.

CHAPTER SIX

SERVICE MONITORING

REQUIREMENT TO MONITOR TRANSIT SERVICE

The revised FTA Title VI circular, FTA C4702.1B, Chapter IV.6, requires that, to comply with Title VI, providers of public transportation that operate 50 or more fixed-route vehicles in peak service, and that are located in an urbanized area (UZA) of 200,000 or more in population, must monitor the performance of their transit system relative to their system wide service standards and policies not less often than once every three years.

To comply with the requirement to monitor transit service, RIPTA has selected a sample of minority and non-minority bus routes to determine compliance with system wide service standards and policies. RIPTA has defined minority transit routes based on rider survey data gathered through a 2016 on-board customer survey. A route with minority ridership exceeding RIPTA's system-wide average of 52.2% minority ridership by at least ten percentage points is considered by RIPTA to be a minority route. The bus routes selected as a sample are shown in **Table 6-1** below, and include route types from all of the RIPTA Family of Services as outlined in the Service Guidelines adopted in April 2015.

Table 6-1. Selected Routes for Service Monitoring

Route	Minority/Non-Minority	Route Type
R-Line	Minority Route	Rapid
6 Prairie Ave / RW Zoo	Minority Route	Urban Radial
17 Dyer / Pocasset	Minority Route	Urban Radial
18 Union Avenue	Minority Route	Urban Radial
21 Reservoir Avenue	Non-Minority Route	Urban Radial
34 East Providence	Minority Route	Suburban & Crosstown
35 Rumford / Newport Ave	Non-Minority Route	Suburban & Crosstown
57 Smith Street	Non-Minority Route	Urban Radial
59X North Smithfield	Non-Minority Route	Express
60 Providence / Newport	Non-Minority Route	Regional

Disparate Impacts

The FTA requires that a policy or procedure be used to determine whether disparate impacts exist on the basis of race, color, or national origin, and that it be applied to the results of the monitoring activities. For the purposes of service monitoring, a disparate impact occurs when the performance of service provided to minority routes pass the service standard at a rate less than eighty percent (80%) of the service provided to non-minority routes.

VEHICLE LOAD

RIPTA will design its services to keep the number of passengers on its vehicles at a comfortable level, always within the limits of safety. In peak periods, this means that some passengers may be expected to stand for part of the trip. In off-peak periods and for service that operates for long distances, service will be designed to try to provide a seat to all customers.

Two different techniques are used to keep passenger loads within acceptable levels. The first is to match vehicle types with ridership levels, and to use larger vehicles on higher ridership routes. The second method is to provide more frequent service, with service frequencies set to keep passenger loads within the limits presented in Table 4.

The vehicle load standard is calculated on the basis of an average for both the peak and off-peak periods, at the busiest point on the route. For instance, if a service operates at 15-minute frequency, then 4 buses would pass the busiest point in an hour. The average number of passengers for these 4 buses must fall within the service standards, even though any one bus may be more crowded than the average. If the standard is exceeded for the average calculation, RIPTA will consider more frequent service or larger vehicles to improve the situation.

Average Vehicle Loading Maximums

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS	FLEX
Average Maximum Passenger Loading (as a percentage of seating capacity)							
Peak	120%	120%	120%	120%	100%	100%	100%
Off-Peak	100%	100%	100%	100%	100%	—	100%

Table 6-2 presents the vehicle load performance of all the routes evaluated. All routes are currently meeting the vehicle load guidelines.

Table 6-2 Vehicle Load Performance

Route	Minority / Non-Minority	Average Max Load - Peak	Average Max Load - Off-Peak
R-Line	Minority	54.28%	44.15%
6 Prairie Ave / RW Zoo	Minority	35.53%	12.84%
17 Dyer / Pocasset	Minority	34.54%	30.51%
18 Union Avenue	Minority	28.28%	22.87%
21 Reservoir Avenue	Non-Minority	43.03%	35.72%
34 East Providence	Minority	34.08%	26.33%
35 Rumford / Newport Ave	Non-Minority	26.74%	20.67%
57 Smith Street	Non-Minority	26.00%	21.49%
59X North Smithfield	Non-Minority	28.90%	21.54%
60 Providence / Newport	Non-Minority	45.95%	43.74%

VEHICLE HEADWAY

Service frequency (the time interval between two vehicles traveling in the same direction on the same route) has a major influence on transit ridership; high frequency service is often considered a key characteristic for attractive service. At the same time, frequency has a significant impact on operating costs, and service requirements increase exponentially with improvements in service frequency.

Because of the expense of high frequency service, transit service frequency is normally based upon existing or potential demand. This often translates into variations in service frequency throughout the day, with higher frequency in peak periods, and less frequent service outside of the peak.

In general, frequencies are established to provide enough vehicles past the maximum load point(s) on a route to accommodate the passenger volume and stay within recommended loading standards. Minimum service frequency guidelines are presented in Table 3. Note that when a corridor is served by multiple routes, effective service frequencies in the corridor would be more frequent than those for individual routes. For certain routes serving outlying areas of the state, service areas may be reduced to maintain satisfactory farebox recovery ratios. As with all standards, this service frequency matrix should be considered a guide, not an absolute measure.

MINIMUM SERVICE FREQUENCY GUIDELINES (MINUTES)

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
Weekdays							
Early AM	30	30	60	60	60	—	n/a
AM Peak	10	20	30	60	60	3 trips	n/a
Midday	10	20	60	60	60	—	n/a
PM Peak	10	20	30	60	60	3 trips	n/a
Night	30	30	60	60	120	—	n/a
Saturdays							
All Day	15	30	60	60	—	—	n/a
Sundays							
All Day	15	30	60	60	—	—	n/a

Table 6-3 presents the vehicle headway schedules of all the routes evaluated for weekday, Saturday and Sunday.

Table 6-3. Vehicle Headway

Route	Weekday Headway			Saturday Headway	Sunday Headway
	Peak	Off-Peak	Night		
R-Line	10	10	20	15	15
6 Prairie Ave / RW Zoo	60	30	-	60	60
17 Dyer / Pocasset	30	30	60	45	60
18 Union Avenue	30	60	60	60	---
21 Reservoir Avenue	30	30	40	40	50
34 East Providence	60	60	60	45	60
35 Rumford / Newport Ave	45	45	45	90	90
57 Smith Street	30	30	60	30	60
59X North Smithfield	3 Trips	---	---	---	---
60 Providence / Newport	15	15	60	30	45

NOTE: RED indicates that the guideline is not currently being met; all others meet or exceed the guidelines.

RIPTA’s Service Guidelines state that the guidelines are “designed to—within limits—provide flexibility to respond to varied customer needs and community expectation in an accountable, equitable, and efficient manner.” The document also states that “adherence to these service guidelines is dependent upon resource availability, and in particular, the amounts of funding provided by RIPTA’s local partners. In the event of constrained resources, RIPTA will meet these guidelines as closely as possible and will work to achieve consistency as resources permit.”

Route 6 does not meet peak frequency guidelines due to one of the primary route generators, the Roger Williams Zoo, not opening until 10:00am and closing at 4:00pm. Frequency increases to every 30 minutes once the zoo opens. Route 6 is also geographically close to the R-Line, about a quarter mile, and they overlap in some areas, resulting in a very high level of service in this part of the city of Providence.

Route 18 has never offered Sunday service. The Comprehensive Operational Analysis (COA), completed in the summer of 2013, only recommended that Saturday span of service be extended, which RIPTA implemented, but did not suggest that Sunday service was warranted. Similar to route 6, route 18 is less than a half mile from two other routes that offer a high level of service on weekdays, Saturdays and Sundays, which impacts route 18 ridership.

Route 35 weekend frequencies are not compliant with the Service Guidelines but they do match the COA recommendations.

All other routes in this analysis are currently meeting or exceeding the guidelines.

ON-TIME PERFORMANCE

To determine on-time performance, RIPTA’s standard is based on the average of all of the transit agencies included in the American Bus Benchmarking Group, which is 79%. RIPTA’s Service Guidelines define a trip as being on time if it is one minute early and up to 5 minutes late. Table 6-4 below shows the on-time performance for the routes in this evaluation.

Table 6-4. On-Time Performance

Route	Observed Performance
R-Line	83%
6 Prairie Ave / RW Zoo	82%
17 Dyer / Pocasset	79%
18 Union Avenue	89%
21 Reservoir Avenue	80%
34 East Providence	82%
35 Rumford / Newport Ave	82%
57 Smith Street	85%
59X North Smithfield	63%
60 Providence / Newport	67%

As shown in the table above, all minority routes currently meet the on-time performance standard. Routes 59X and route 60 are not currently meeting the standard. These are both very long regional routes and RIPTA is working on ways to improve their performance. RIPTA has an On-Time Performance Committee, which consists of Planning Department staff, Drivers' Union representatives, Street Supervisors, and drivers familiar with each route being studied. The committee's goal is to improve on-time performance by analyzing routes one by one and developing solutions for improvements. This has been an ongoing process, which began in the spring of 2015.

DISTRIBUTION OF TRANSIT AMENITIES

g. Seating

RIPTA does not have a program to provide benches at bus stops.

h. Bus Shelters

The placement of shelters and the development of a priority location program is based on the number of boarding passengers at a specific stop. All stops with 100 or more passengers boardings, or which serve concentrations of elderly or handicapped residents, are prioritized for shelters.

As shown in Table 6.5, 42 of 316, or 13.3% of the bus stops on minority routes have shelters, and 53 of 593 (8.9%) of stops of the selected non-minority routes have shelters. The ratio of minority to non-minority shelters is 1.49, which is above the disparate impact threshold of 0.80. No disparate impact is found.

Table 6.5 Shelter Placement

Route Classification	Number of Bus Stops	Number of Stops with Shelters	% of Stops with Shelters
Minority	316	42	13.3%
Non-minority	593	53	8.9%

i. Provision of Information

a. *Printed Signs, System Maps, & Schedules.* Timetables, and system maps are provided at transit hubs in the RIPTA system. RIPTA does not provide printed signs, system maps or timetables at other bus stops.

- b. *Digital Signs.* Real time signage is provided at transit hubs in the RIPTA system. RIPTA does not provide real time signage at other bus stops.

j. Escalators

RIPTA does not have any escalators located at fixed guideway stations.

k. Elevators

RIPTA does not have any elevators located at fixed guideway stations.

l. Waste Receptacles

RIPTA provides waste receptacles at all transit hubs. RIPTA does not have a program to provide waste receptacles at other bus stops.

VEHICLE ASSIGNMENT

Vehicle assignment at RIPTA is fairly simple because there is very little variation in the fleet. There is a small fleet of branded buses that are used exclusively on the R-Line rapid route, and RIPTA employs smaller 35-foot buses on routes that operate in areas with difficult turning movements. However, the remaining buses are nearly all low-floor vehicles that are assigned to the remaining routes. To assess bus vehicle age assigned to minority classified routes and nonminority classified routes, RIPTA compared the average age of buses assigned to runs on each route. Table 6.6 shows the average age of buses operating on each route. The average age for buses operating on minority routes is 6.7 years. The average age for buses operating on nonminority routes is 6.6 years. The ratio of minority to non-minority average vehicle age is 0.98, which is above the disparate impact threshold of 0.80. No disparate impact is found.

Table 6.6 Bus Vehicle Age

Route	Average Age
R-Line	4.9
6 Prairie Ave / RW Zoo	8.4
17 Dyer / Pocasset	5.1
18 Union Avenue	8.0
21 Reservoir Avenue	8.0
34 East Providence	7.2
35 Rumford / Newport Ave	7.4
57 Smith Street	3.5

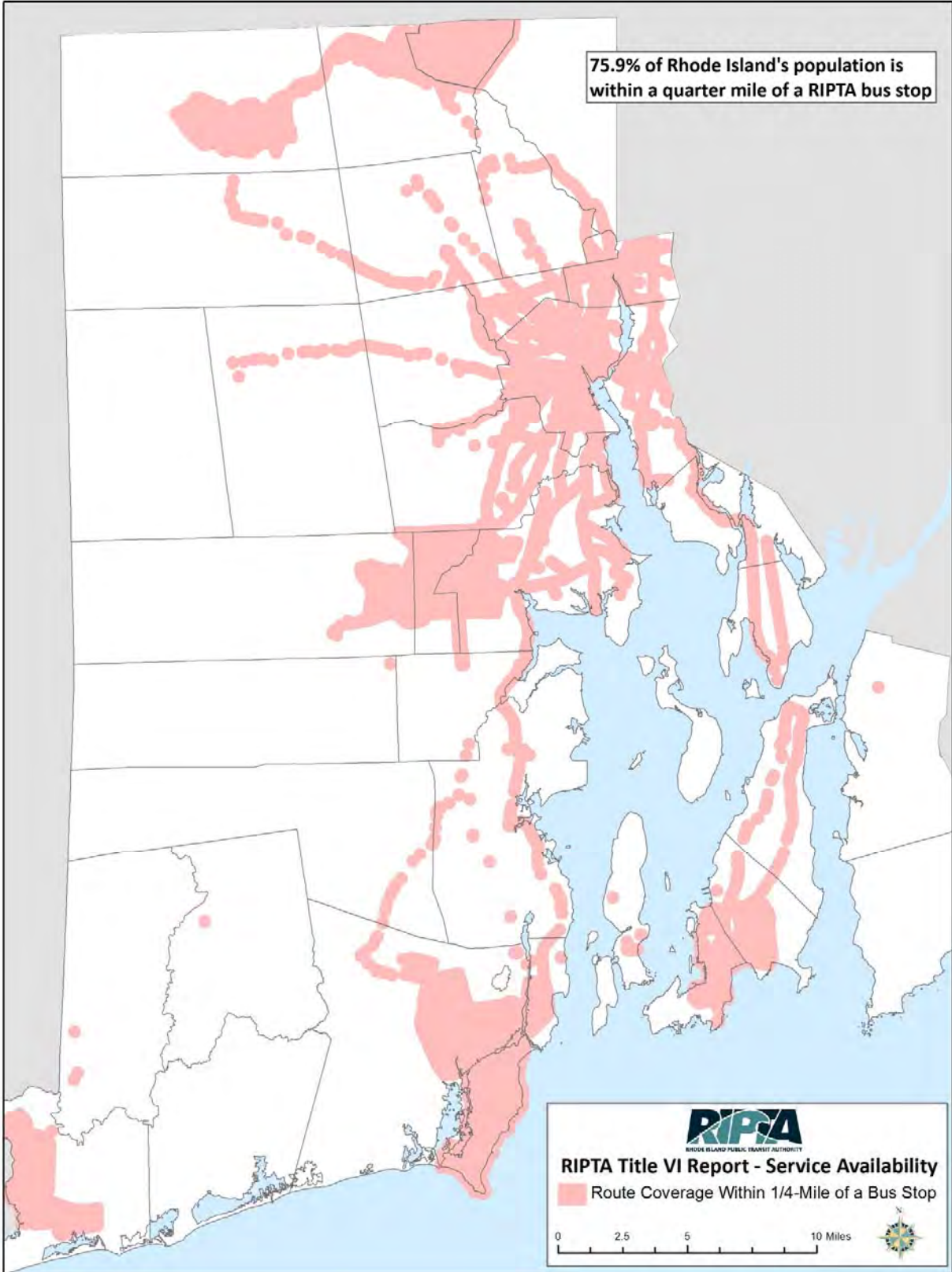
59X North Smithfield	6.0
60 Providence / Newport	8.3

NOTE: Vehicle assignments on February 7, 2018.

SERVICE AVAILABILITY

RIPTA uses population and employment density to evaluate the potential for service. If densities are relatively high along a continuous corridor, or if the corridor connects major activity centers or hubs, a higher level of service may be warranted. If densities meet the minimum guidelines, but only exist in small or scattered areas, travel demand may not be sufficient to support transit. Or, a lower level of transit, such as Flex, is considered.

Areas with higher population densities need more transit service than sparsely populated areas. Rhode Island comprises 1,024 square miles of land, and 242 square miles, or 23.6%, are within a quarter mile of a RIPTA bus stop. While this may seem like a low percentage of coverage, the state is densely settled and the majority of the state's population is close to a bus stop. Per the 2010 Census, Rhode Island's population is 1,051,302, and 798,681, or 75.9%, are within a quarter mile of a RIPTA bus stop. The following map depicts RIPTA's current service coverage area.





HOW TO REACH US

401 784 9500

705 ELMWOOD AVE.
PROVIDENCE, RI 02907

CALL CENTER HOURS OF OPERATION

MONDAY TO FRIDAY 7:00AM – 7:00PM

SATURDAY 8:00AM – 6:00PM

www.RIPTA.com



APPENDIX



Rhode Island Public Transit Authority Title VI Complaint Form

RIPTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact Customer Service by calling (401) 781-9400. The completed form must be returned to RIPTA via e-mail: mbarbary@ripta.com OR mail to:
705 Elmwood Avenue, Providence, RI 02907, ATTN: CEO.

Your Name:	Phone:	Alt. Phone:
Street Address:	City, State, Zip Code:	
Person(s) discriminated against (if someone other than complainant):		
Name(s):		
Street Address, City, State & Zip Code:		

Which of the following best describes the reason for the alleged discrimination that took place? (Select one)

Date of incident: _____

- Race
- Color
- National Origin (Limited English Proficiency)

Please describe the alleged discrimination incident. Provide names and titles of all RIPTA employees involved if available. Please provide as much detail as possible: route number, date and time of day, bus number, names and contact information for witnesses. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Complete reverse side of form



Rhode Island Public Transit Authority Título VI Formulario de Queja

RIPTA está cometido a asegurar que las personas no sean excluida de la participación ni negado a los beneficios de sus servicios por raza, el color de la piel, ni origen nacional esta proporcionado por Título VI del Acto Civil de Derechos de 1964, como enmendado. **Quejas de Título VI deben ser archivadas dentro de 180 días de la fecha de la discriminación presunta.**

La información siguiente es necesaria para ayudarnos a procesar con su queja. Si requiere cualquier ayuda para completar esta forma, contacta por favor La Oficina de Servicio de Atención al cliente llamando (401) 781-9400. La forma completada debe ser devuelta a RIPTA a través de correo electrónico: mbarbary@ripta.com O envía a: 705 705 Elmwood Avenue, Providence, RI 02907, A LA ATENCION DE. Oficial Civil de Derechos.

Nombre:	Teléfono:	Otro Teléfono:
Calle:	Ciudad, Estado, Código Postal:	
Las personas que fueron discriminadas en contra (Si es alguien además de que la persona que hace la queja):		
Nombre(s):		
Dirección:		

¿Cuál del siguiente describe mejor la razón para la discriminación presunta que sucedió? (Seleccione uno)

La fecha de incidente: _____

- Raza
- El color de la piel
- Origen Nacional (Habilidades Limitadas en el Inglés)

Describa por favor el incidente presunta de discriminación. Proporcione nombres y títulos de todos los empleados de RIPTA implicados si es disponible. Proporcione por favor tanto detalles como posible: número de ruta, la fecha y el tiempo de día, número de autobús, los nombres y contacte información para testigos. Explique lo que sucedió y quien usted cree fue responsable. Utilice por favor el dorso de esta forma si el espacio adicional es requerido.

Rellene del dorso de formulario

RIPTA Título VI Formulario de Queja

Por favor, describa el incidente presunta de discriminación (continuo).

Exhibit B

B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Universe: Population 5 years and over
2016 American Community Survey 1-Year Estimates

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Versions of this table are available for the following years:

- 2016**
- 2015
- 2014
- 2013
- 2012
- 2011
- 2010
- 2009
- 2008
- 2007
- 2006
- 2005

1 - 128 of 128	Rhode Island	
	Estimate	Margin of Error
Total:	1,002,282	+/-8,807
Speak only English	774,234	+/-8,645
Spanish:	120,077	+/-3,667
Speak English "very well"	71,537	+/-4,684
Speak English less than "very well"	48,540	+/-3,443
French (incl. Cajun):	8,530	+/-1,751
Speak English "very well"	7,075	+/-1,498
Speak English less than "very well"	1,455	+/-727
Haitian:	11,294	+/-3,392
Speak English "very well"	6,606	+/-2,355
Speak English less than "very well"	4,688	+/-2,081
Italian:	5,536	+/-1,239
Speak English "very well"	4,197	+/-946
Speak English less than "very well"	1,339	+/-561
Portuguese:	32,618	+/-4,948
Speak English "very well"	20,736	+/-3,600
Speak English less than "very well"	11,882	+/-2,570
German:	1,906	+/-887
Speak English "very well"	1,608	+/-831
Speak English less than "very well"	298	+/-341
Yiddish, Pennsylvania Dutch or other West Germanic languages:	88	+/-86
Speak English "very well"	88	+/-86
Speak English less than "very well"	0	+/-208
Greek:	2,160	+/-1,026
Speak English "very well"	2,033	+/-981
Speak English less than "very well"	127	+/-150
Russian:	2,360	+/-994
Speak English "very well"	1,626	+/-739
Speak English less than "very well"	734	+/-420
Polish:	1,944	+/-1,097
Speak English "very well"	1,158	+/-658
Speak English less than "very well"	786	+/-742

	Rhode Island	
	Estimate	Margin of Error
Serbo-Croatian:	453	+/-730
Speak English "very well"	193	+/-306
Speak English less than "very well"	260	+/-425
Ukrainian or other Slavic languages:	292	+/-235
Speak English "very well"	220	+/-186
Speak English less than "very well"	72	+/-99
Armenian:	544	+/-422
Speak English "very well"	447	+/-345
Speak English less than "very well"	97	+/-110
Persian (incl. Farsi, Dari):	219	+/-217
Speak English "very well"	113	+/-137
Speak English less than "very well"	106	+/-125
Gujarati:	838	+/-558
Speak English "very well"	679	+/-453
Speak English less than "very well"	159	+/-152
Hindi:	2,645	+/-1,602
Speak English "very well"	2,148	+/-1,187
Speak English less than "very well"	497	+/-561
Urdu:	1,855	+/-1,717
Speak English "very well"	1,819	+/-1,727
Speak English less than "very well"	36	+/-77
Punjabi:	0	+/-208
Speak English "very well"	0	+/-208
Speak English less than "very well"	0	+/-208
Bengali:	316	+/-346
Speak English "very well"	191	+/-226
Speak English less than "very well"	125	+/-229
Nepali, Marathi, or other Indic languages:	1,692	+/-1,058
Speak English "very well"	859	+/-799
Speak English less than "very well"	833	+/-858
Other Indo-European languages:	1,121	+/-932
Speak English "very well"	750	+/-646
Speak English less than "very well"	371	+/-346
Telugu:	1,138	+/-942
Speak English "very well"	277	+/-344
Speak English less than "very well"	861	+/-822
Tamil:	629	+/-776
Speak English "very well"	629	+/-776
Speak English less than "very well"	0	+/-208
Malayalam, Kannada, or other Dravidian languages:	0	+/-208
Speak English "very well"	0	+/-208
Speak English less than "very well"	0	+/-208
Chinese (incl. Mandarin, Cantonese):	5,760	+/-1,805
Speak English "very well"	2,730	+/-1,267
Speak English less than "very well"	3,030	+/-1,113
Japanese:	1,595	+/-860
Speak English "very well"	976	+/-604
Speak English less than "very well"	619	+/-507
Korean:	1,303	+/-586
Speak English "very well"	319	+/-466
Speak English less than "very well"	484	+/-349

	Rhode Island	
	Estimate	Margin of Error
Hmong:	693	+/-502
Speak English "very well"	330	+/-297
Speak English less than "very well"	363	+/-397
Vietnamese:	1,594	+/-1,095
Speak English "very well"	676	+/-433
Speak English less than "very well"	918	+/-772
Khmer:	4,429	+/-1,950
Speak English "very well"	2,520	+/-1,342
Speak English less than "very well"	1,909	+/-939
Thai, Lao, or other Tai-Kadai languages:	3,456	+/-1,615
Speak English "very well"	1,767	+/-958
Speak English less than "very well"	1,689	+/-951
Other languages of Asia:	351	+/-394
Speak English "very well"	351	+/-394
Speak English less than "very well"	0	+/-208
Tagalog (incl. Filipino):	1,442	+/-833
Speak English "very well"	1,132	+/-662
Speak English less than "very well"	310	+/-299
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	408	+/-322
Speak English "very well"	304	+/-343
Speak English less than "very well"	104	+/-176
Arabic:	1,779	+/-988
Speak English "very well"	1,242	+/-807
Speak English less than "very well"	537	+/-450
Hebrew:	84	+/-86
Speak English "very well"	84	+/-86
Speak English less than "very well"	0	+/-208
Amharic, Somali, or other Afro-Asiatic languages:	692	+/-547
Speak English "very well"	659	+/-520
Speak English less than "very well"	33	+/-54
Yoruba, Twi, Igbo, or other languages of Western Africa:	3,988	+/-1,756
Speak English "very well"	2,980	+/-1,436
Speak English less than "very well"	1,008	+/-786
Swahili or other languages of Central, Eastern, and Southern Africa:	1,123	+/-695
Speak English "very well"	1,123	+/-695
Speak English less than "very well"	0	+/-208
Navajo:	0	+/-208
Speak English "very well"	0	+/-208
Speak English less than "very well"	0	+/-208
Other Native languages of North America:	199	+/-242
Speak English "very well"	199	+/-242
Speak English less than "very well"	0	+/-208
Other and unspecified languages:	897	+/-619
Speak English "very well"	869	+/-589
Speak English less than "very well"	28	+/-45

Source: U.S. Census Bureau, 2016 American Community Survey 1-Year Estimates

Explanation of Symbols:

EXHIBIT C



RIPTA – Customer Service Interpreter Access Instructions



- **Dial 866-998-0338**
- **Enter Account# 14071**
- **Enter Pin# 5355**
- **Please say the language -or- enter a 3-digit language code**
- **Hold temporarily as you connect to an interpreter**
 - Brief the interpreter on the nature of the call and begin your conversation

Need assistance? - Call 800-481-3289 24/7 to be connected with a Voiance Client Services Representative.



Working Effectively with an Interpreter



1. Allow the interpreter to greet you and to provide an interpreter ID number
2. Write the interpreter ID number in the customer's file or progress notes for documentation
3. Provide the interpreter with a brief explanation of the call
4. Allow the interpreter to introduce him/herself to the customer
5. Speak directly to your customer and make eye contact when face to face
6. Use short but complete phrases as interpreter needs to process two languages
7. Speak in the first person
8. Avoid slang, jargon or metaphors
9. Allow the interpreter to clarify linguistic and cultural issues
10. Remember that everything is repeated and kept confidential

For 24-hour assistance call Client Services at 800-481-3289.

Contact Us

Phone: (866) 742-9080 ext. 1
Fax: (520) 745-9022
Email: info@voiance.com
Web: www.voiance.com

Mailing Address:
Voiance
5780 North Swan Road
Tucson, Arizona 85718

Interpretation Services Available

You have access to over-the-phone interpretation services 24 hours a day, 7 days a week. This chart is designed to help you identify the languages commonly spoken in your community. Additional languages are available.

English: Do you speak [language]? We will telephone for an interpreter.

Albanian Shqip	A flisni shqip? Ne do të telefonojmë një përkthyes.	Italian Italiano	Parlate italiano? Chiameremo un interprete.
Arabic العربية	هل تتكلم اللغة العربية ؟ سوف نتصل تلفونيا بالمرجم .	Japanese 日本語	日本語を話しますか。 通訳をお呼びいたします。
Bangali বাংলা	আপনি কি বাংলা কতে পারেন? আমরা একজন দোভাষীর সঙ্গে টেলিফোনে যোগাযোগ করব	Korean 한국어	한국어 통역이 필요하십니까? 통역사를 전화로 연결해 드리겠습니다.
Bosnian Bosanski	Govorite li Bosanski? Nazvaćemo prevodioca.	Laotian ລາວ	ທ່ານເປົາພາສາລາວຫລືບໍ່? ພວກເຮົາຈະສອບຖາມເພື່ອຄວາມຕ້ອງການພາສາໄທ້.
Cambodian ខ្មែរ	អើយ្យាប្រាប់អង្គុយ ឮទេ? យើងនឹងទូរស័ព្ទស្វែងរកអ្នកបកប្រែ	Mandarin 普通话	您讲普通话吗? 我们将打电话为您找一位翻译来。
Cantonese 广东	您講廣東話嗎? 我們將打電話為您找一位翻譯來。	Polish Polski	Czy mówi Pan/Pani po polsku? Zadzwoimy po tłumacza.
Chinese 中文	您讲中文吗? 我们将打电话去找一位翻译。	Portuguese Português	Você fala português? Contactaremos um intérprete.
Farsi فارسی	آیا شما فارسی صحبت میکنید? ما میخواهیم به یک مترجم تلفن کنیم.	Punjabi ਪੰਜਾਬੀ	کیا آپ ہندی بول سکتے ہیں? ہم کے ترجمان کو ٹیلیفون پر لائیں گے۔
French Français	Parlez-vous français? Nous contacterons un interprète.	Russian Русский	Вы говорите по-русски? Мы позвоним переводчику.
French Creole Kreyòl Fransè	Èske ou pale Fransè Kreyòl? Nap rele yon entèprèt nan telefòn pou ede w.	Somali Soomaali	Al Soomaaliga ma ku hadashaa? Waxaan telefoon u dirin doonnaa turjumaan.
German Deutsch	Sprechen Sie Deutsch? Wir rufen einen Dolmetscher an.	Spanish Español	¿Habla español? Vamos a llamar a un intérprete.
Greek Ελληνικά	Μιλάτε Ελληνικά; Θα τηλεφωνήσουμε σε διερμηνέα.	Turkish Türkçe	Türkçe biliyormusunuz? Biliyorsanız bir tercüman bulacağız.
Haitian Creole Kreyòl Ayisyen	Èske ou pale Kreyòl? Nap rele yon entèprèt nan telefòn pou ede w.	Ukrainian Українська	Ви розмовляєте українською мовою? Ми зателефонуємо перекладачу.
Hindi हिन्दी	क्या आप हिन्दी बोलते हैं ? हम एक दुभाषिये को फोन कर देंगे ।	Urdu اردو	کیا آپ ہندی بول سکتے ہیں? ہم کے ترجمان کو ٹیلیفون پر لائیں گے۔
Hmong Hmoob	Koj puas hais lus Hmoob? Peb mam li hu ib tug neeg txhais lus rau koj.	Vietnamese Tiếng Việt	Ông/bà nói tiếng Việt phải không? Chúng tôi sẽ gọi cho một thông dịch viên.



Language Code List

The Voiance Language Code List provides the most frequently requested languages and their corresponding language code that may be used to make your language selection when accessing an interpreter. Additional languages are available upon request. If you require further assistance requesting or identifying a language please contact Voiance Client Services at 800-481-3289.

264 Acholi (Sudan - Uganda)	273 Edo	121 Ilonggo	291 Marshallese	089 Sinhala
265 Afghan	274 Eritrean	050 Indonesian	355 Maya	064 Slovak
224 Afrikaans	349 Eskimo	018 Inupiaq	356 Mende	301 Slovakian
016 Akan	326 Esperant	059 Italian	045 Mien	134 Slovenian
120 Aklan	077 Estonian	235 Jakananese	373 Mirpun	142 Somali
070 Albanian	275 Ethiopian	292 Jamican English Creole (Patois)	292 Mixteco	375 Sorani
027 Amharic (Ethiopia)	321 Ewe	040 Japanese	389 Mola/Mossi	060 Spanish
323 Apache	327 Fang	236 Javanese	340 Moldovan	258 Suchown
090 Arabic	074 Fanri	379 Jingpho	150 Mongolian	311 Sudanese Arabic
072 Armenian	107 Farsi	328 Jula	339 Montenegrin	368 Susu/Soso
365 Ashanti	127 Fijian	371 Kachchi	330 Montgnard	026 Swahili
139 Assyrian	017 Fijian Polynesian	288 Kanjobal	381 Moroccan Arabic	053 Swedish
109 Azerbaijani	052 Finnish	289 Kannada	293 Nahuatl	377 Sylheti
343 Bahasa/Brunei	227 Flemish	369 Karen	248 Nanjing	108 Tadzhi
019 Bambara	228 Fon	238 Karennu/Kayah	144 Navajo	302 Tachew
267 Banda	276 Foochow	237 Kashmiri	374 Ndebele	117 Tagalog
268 Bangi	058 French	238 Kazakh	249 Neopolitan	033 Taiwanese
136 Basque	277 French Cajun	044 Khamu	081 Nepali	137 Tamil
314 Bassa	383 French Canadian	023 Khmer	363 Nigerian English Pidgin	303 Telegu
225 Belorussian	217 French Creole	239 Kikuyu	250 Nipponese	359 Temne
324 Bemba	278 Frisian	366 Kinya/Rwanda	054 Norwegian	047 Thai
084 Bengali	032 Fukinese	240 Kirghiz	294 Nuer (Sudan)	105 Tibetan
269 Berber	014 Fulani	338 Kirundi	251 Oromo (Ethiopia)	028 Tignna (Eritrea)
085 Bhojpur	229 Fuzhou	376 Kongo	386 Ouatchi	307 Tohono O'Odham
118 Bicol	230 Ga	041 Korean	296 Paluan	305 Toisan
382 Borana	231 Gaddang	320 Krahn	116 Pampang	036 Toishanese
263 Bosnian	232 Gaelic	241 Krio	114 Pangasnian	128 Tongan
270 Brazil-Portuguese	228 Gallinya	364 Kru/Krumen	252 Pao-An	334 Trnqi
069 Bulgarian	281 Gana	370 Kunama	253 Papiamento	342 Trukese/Chuukese
042 Burmese	282 Ganda (Uganda)	140 Kurdish	110 Pashto (Afghanistan)	259 Tshluba
325 Cakchiquel	388 Gari	372 Kurmanji	297 Persian	112 Turkish
048 Cambodian	216 Georgian	353 Lahu	254 Pidgin English	095 Twi
031 Cantonese	057 German	143 Lakota	331 Pohnpeian	076 Ukrainian
013 Cape Verdean	322 Grebo	367 Lanvhou	062 Polish	079 Urdu
132 Catalan	071 Greek	043 Lao	073 Polymesian	336 Uzbek
122 Cebuano	125 Guamanian	204 Latvian	061 Portuguese	049 Vietnamese
138 Chaldean	350 Guarani	024 Lingala	141 Portuguese Creole	214 Visayan
038 Chao Chow	083 Gujarati	075 Lithuanian	358 Pothohari	117 Waray-Waray
226 Chavacano	284 Gwa	313 Lorna	080 Punjabi	020 Wolof
344 Cherokee	129 Haitian Creole	242 Luganda	332 Purepecha/Tarasco	061 Wu
025 Chichewa	039 Hakka	329 Luo	145 Quechua	360 Xhosa
030 Chinese	022 Hausa	243 Luxembourgeois	317 Quiche	361 Yapese
378 Chinese	285 Hawaii Creole	315 Maay Somali	260 Quxinese	387 Yemeni Arabic
346 Chui Chow	106 Hebrew	068 Macedonian	298 Romani	135 Yiddish
034 Chungshan	082 Hindi	087 Magahi	061 Romanian	021 Yoruba
316 Chuukese	351 Hindko	086 Marthili	078 Russian	362 Yucateco
348 Creek	319 Hindustani	244 Malagasy	126 Samoan	262 Yugoslavian
347 Creek	046 Hmong	051 Malay	337 Sarahuleh/Soninke	146 Yupik
341 Crioulo	286 Hokkien	028 Malayalam	255 Senegalese	115 Zambal
067 Croat an	310 Hopi	354 Malinke	148 Serbian	380 Zande
063 Czech	233 Hubel	245 Maltese	299 Serbo Croatian	029 Zapotec
271 Dakota	352 Huizhou	318 Mam	037 Shanghai	335 Zarma
055 Danish	147 Hunanese	035 Mandarin	333 Sichuan/Szechuan	309 Zulu
111 Dari (Afghanistan)	065 Hungarian	015 Mandingo	256 Sicilian	
131 Dinka (Sudan)	234 Ibanag	246 Mandinka	257 Sindi	
056 Dutch	218 Ibo	247 Mankon		
272 Ebon	133 Icelandic	205 Marathi		
	113 Ilocano			



Use this chart to phonetically say **Please Hold** or **One Moment, Please** when you need to place a Limited English Proficient caller on hold to access an interpreter.

English	Please Hold	One Moment, Please
Arabic	Arjoo alintithar	Lahtha min fadlek
Armenian	Khntroom enk spasel	Mi rope
Chinese	Qǐng bié guà jǐ	Qǐng nín shāo děng
Farsi	Lotfan gooshee	Yek Lahzeh lotfan
French	Vuyeh pahsyontay	Uhng momeng sil voo play
German	Bit-tuh lay-gen zee niht owf	Bit-tuh hah-ben zee einen moment ge-doold
Italian	Attay nday ray pray-goh	Uhn moh may ntoh pray-goh
Japanese	Omachiqudasai	Sukoshi omachiqudasai
Khmer	Sōm cham bontèk	Sōm cham mūy plait
Korean	Jam kkan man yo	Jam si man yo
Mandarin	Qǐng bié guà jǐ	Qǐng nín shāo děng
Portuguese	Por fahvorh, ahguahrdee	Oong momentu por fahvorh
Russian	Po-zha-lui-sta po-do-zhdi-te	Ad-nu mi-nut-ku
Spanish	Ace-pay-rae poor-fah-vohr	Oon moe-main-toe poor-fah-vohr
Vietnamese	Sin zu may	Doi mot Lat

Performance By Language

RUN TIME: 1/29/2018 1:45:11 PM
RUN BY: Raquel Castro
START: 1/1/2015
END: 3/31/2015
QUEUES: *Queues are listed at the end of the report
ACCOUNTS: 501014071



Language	Calls Requested	Calls Answered	Average Speed of Answer	Completion Rate	Calls Answered Within 30 Seconds
Spanish	17	17	12	100%	88%
Total/Average:	17	17	12	100%	88%

Performance By Language

RUN TIME: 1/29/2018 1:54:05 PM
RUN BY: Raquel Castro
START: 1/1/2016
END: 3/31/2016
QUEUES: *Queues are listed at the end of the report
ACCOUNTS: 501014071



Language	Calls Requested	Calls Answered	Average Speed of Answer	Completion Rate	Calls Answered Within 30 Seconds
Arabic	1	1	0	100%	100%
Brazil-Portuguese	1	1	0	100%	100%
Korean	1	1	0	100%	100%
Portuguese	1	1	12	100%	100%
Spanish	22	22	13	100%	86%
Total/Average:	26	26	12	100%	88%










Performance By Language

RUN TIME: 1/29/2018 2:02:12 PM
RUN BY: Raquel Castro
START: 1/1/2017
END: 3/31/2017
QUEUES: *Queues are listed at the end of the report
ACCOUNTS: 501014071



Language	Calls Requested	Calls Answered	Average Speed of Answer	Completion Rate	Calls Answered Within 30 Seconds
Brazil-Portuguese	1	1	0	100%	100%
Mandarin	1	1	0	100%	100%
Portuguese	1	1	7	100%	100%
Spanish	8	8	1	100%	100%
Total/Average:	11	11	2	100%	100%

Exhibit D

 IF YOU WOULD LIKE TO RECEIVE ASSISTANCE IN YOUR LANGUAGE, PLEASE CALL RIPTA CUSTOMER SERVICE AT 401-784-9500. EXTENSION 104.	
Portuguese 	Se pretender receber assistência em português, telefone, por favor, para o Serviço de Apoio ao Cliente através do 401-784-9500, extensão 104.
French 	Si vous avez besoin d' aide en français, s'il vous plait appelez le service à la clientèle au 401-784-9500, poste 104.
Mandarin 	如果你需要接受 汉语 的帮助, 请拨打客服电话 401-784-9500, 分机 104.
Khmer 	ប្រសិនបើអ្នកចង់ទទួលបានជំនួយជា (ខ្មែរ), សូមហៅមកលេខសេវាអតិថិជនតាមរយៈលេខ 401-784-9500, លេខបន្ត 104។
Italian 	Se desidera ricevere assistenza in italiano, contatta gentilmente il nostro servizio di Assistenza Clienti al numero 401-784-9500, int. 104.
Laotian 	ຖ້າທ່ານຢາກໄດ້ການຊ່ວຍເຫຼືອເປັນພາສາລາວ, ກະລຸນາໃບຫາພາກສ່ວນບໍລິການລາວ, ກຄ້າທ 401-784-9500, ຕໍາ 104.
Arabic 	إذا كنت ترغب في الحصول على المساعدة في (اللغة العربية)، يُرجى الاتصال بخدمة العملاء على 401-784-9500، بتلخي 104.
Spanish 	Si desea recibir asistencia en español, póngase en contacto con el Servicio de Atención al Cliente en el número 401-784-9500, extensión 104.

TITLE VI INFORMATION Protecting Your Rights

What is Title VI?

Title VI of the Civil Rights Act of 1964 is a federal statute declaring that no person shall be discriminated against or denied benefits on the basis of race, color, or national origin, in programs and services that receive federal financial assistance. To ensure that RIPTA customers are not discriminated against, we have adopted policies that promote equal access and quality service for all our customers.

What Does Title VI Mean to You?

RIPTA hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Public transit agencies, such as RIPTA, are required to provide services in a fair and equitable manner to all passengers without regard to their race, color, or national origin. Title VI also requires RIPTA to reduce language barriers that may impede access to important services by customers who may not be proficient in English.

RIPTA also has a zero-tolerance policy prohibiting any form of unlawful discrimination.

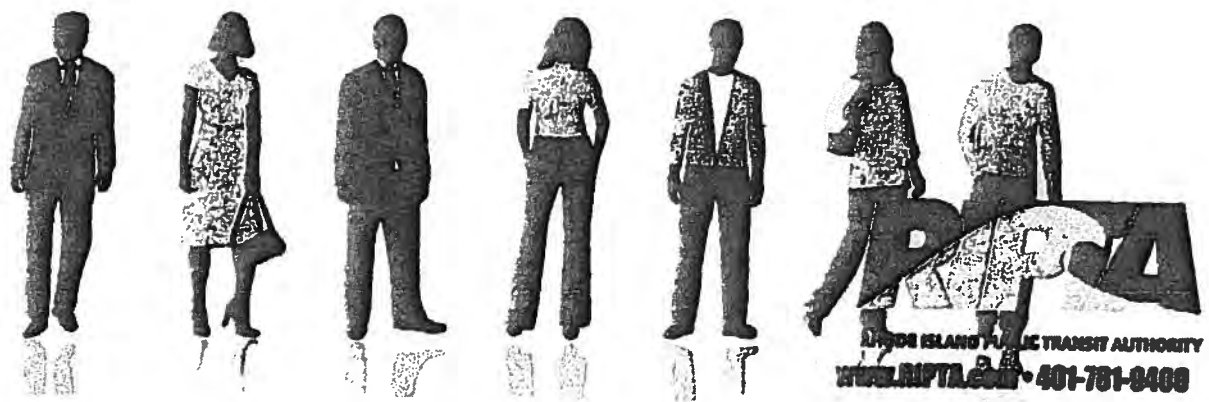
What Should You Do if You Have A Complaint?

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with RIPTA. When submitting a complaint, please include your contact information as well as details of the incident including what occurred, where and when, and the names, addresses, phone numbers and e-mail addresses of witnesses. You may:

- Send a letter to: Customer Service Manager, RIPTA, 705 Elmwood Avenue, Providence, RI 02907
- Call RIPTA Customer Service Office at (401) 784-9500 x183 or x180. Customer Support Service is available Monday-Friday 8:30 AM-4:30 PM.
- Go to RIPTA.com and download a copy of the Title VI Complaint Form to fill out and mail to the above address.

RIPTA Welcomes Your Feedback!

RIPTA is committed to providing safe, efficient and quality transportation services to all the communities we serve. If you have any suggestion on how we can improve on our commitment to nondiscrimination, or how we can better serve the needs of customers who are not proficient in English, we would like to hear from you.



TÍTULO VI INFORMACIÓN

Protegiendo Sus Derechos

¿Qué es el Título VI?

El Título VI de la Ley de Derechos Civiles de 1964 es una ley federal que prohíbe discriminar contra o negarles beneficios a las personas por motivo de su raza, su color o su país de origen, en lo referente a programas y servicios que reciben ayuda financiera federal. Para asegurar que los clientes de RIPTA no sean víctimas de discriminación, hemos adoptado políticas que promueven la igualdad de acceso y servicios de calidad para todos nuestros clientes.

¿Qué significado tiene el Título VI para usted?

Por este medio, RIPTA anuncia al público su política de apoyar y asegurar el cumplimiento cabal del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987, al igual que las leyes y regulaciones relacionadas, en lo referente a todos los programas y actividades. Las agencias de tránsito público como RIPTA están obligadas a prestar sus servicios de manera justa y equitativa a todos los pasajeros, sin considerar su raza, su color o su país de origen. El Título VI también obliga a RIPTA a reducir las barreras idiomáticas que pudieran impedirles el acceso a servicios importantes a aquellos clientes que tal vez no dominan el inglés. Además, la política de mano dura de RIPTA prohíbe cualquier forma de discriminación ilícita.

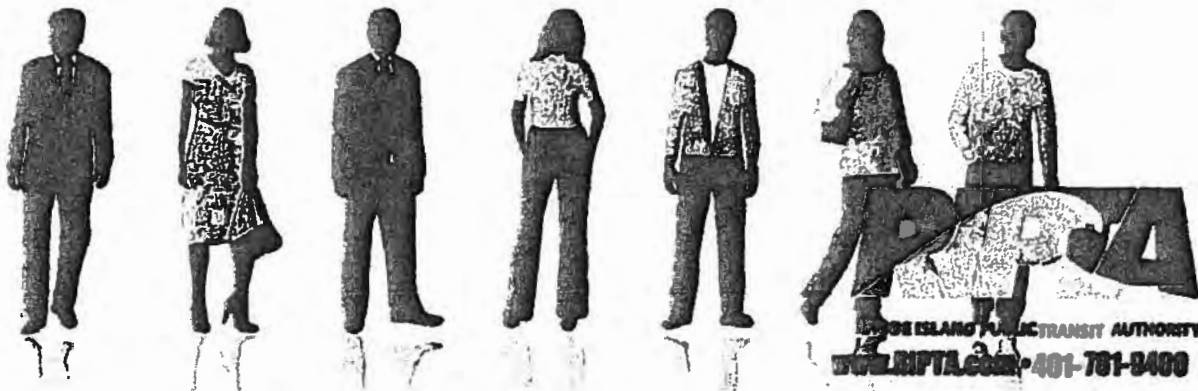
¿Qué debo hacer si tengo una queja?

Cualquier persona que cree haber sido agraviada por una práctica discriminatoria ilegal según el Título VI, tiene derecho a presentar una queja formal ante RIPTA. Al presentar su queja, por favor incluya su nombre, dirección y número de teléfono, así como detalles del incidente tales como lo que ocurrió, dónde y cuándo, y los nombres, direcciones, números de teléfono y direcciones de correo electrónico de los testigos. Usted puede:

- Enviar una carta a: Customer Service Manager, RIPTA, 705 Elmwood Avenue, Providence, RI 02907
- Llamar a la oficina de atención al cliente de RIPTA, (401) 781-9400 x180 o x183. La oficina atiende de lunes a viernes entre las 8:30 AM y las 4:30 PM.
- Ir a RIPTA.com y descargar una copia del formulario para querrelas por el Título VI para llenar y enviar a la dirección de arriba.

¡RIPTA aprecia sus comentarios!

RIPTA se compromete a brindarles servicios de transportación seguros, eficientes y de calidad a todas las comunidades a las cuales servimos. Si tiene alguna sugerencia sobre cómo mejorar nuestro desempeño en materia de la igualdad de trato a toda nuestra clientela o cómo satisfacer mejor las necesidades de los clientes que no dominan el inglés, le escucharemos encantados.



RIPTA
RISLAND PUBLIC TRANSIT AUTHORITY
WWW.RIPTA.COM • 401-781-9400

TITLE VI INFORMATION • Protecting Your Rights / TITULO VI INFORMACION • Protegiendo Sus Derechos

What is Title VI? Title VI of the Civil Rights Act of 1964 is a federal statute declaring that no person shall be discriminated against or denied benefits on the basis of race, color, or national origin, in programs and services that receive federal financial assistance. To ensure that RIPTA customers are not discriminated against, we have adopted policies that promote equal access and quality service for all our customers.

¿Qué es el Título VI? Título VI del Acto Civil de Derechos de 1964 es un estatuto federal que declara que ninguna persona será discriminada en contra ni los beneficios negados por raza, por el color, ni por origen nacional, en programas y servicios que reciben ayuda financiera federal. Para asegurar que clientes de RIPTA no son discriminados en contra, hemos adoptado las políticas que promueven el acceso y la calidad igual extendiendo a para todos nuestros clientes.

What Does Title VI Mean To You? RIPTA hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Public transit agencies, such as RIPTA, are required to provide services in a fair and equitable manner to all passengers without regard to their race, color, or national origin. Title VI also requires RIPTA to reduce language barriers that may impede access to important services by customers who may not be proficient in English. RIPTA also has a zero-tolerance policy prohibiting any form of unlawful discrimination.

¿Qué Título VI Significa El Estado? RIPTA por la presente da nota pública de su política a apoyar y asegurarse de conformidad plena con Título VI del Acto Civil de Derechos de 1964, el Acto Civil de Restauración de Derechos de 1987, y estatutos y regulaciones relacionados en todos los programas y actividades. Las agencias públicas del tránsito, como RIPTA, son requeridas a proporcionar los servicios en una forma y la manera equitativa a todos los pasajeros sin consideración a su raza, al color, o a origen nacional. El título VI también requiere RIPTA a reducir barreras de idioma que pueden estorbar el acceso a servicios importantes por clientes que no puede ser que en inglés. RIPTA capacita también tiene una política de la mano dura que prohíbe ninguna forma de discriminación ilegal.

What Should You Do If You Have a Complaint? Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with RIPTA. When submitting a complaint, please include your contact information as well as details of the incident including what occurred, where and when, and the names, addresses, phone numbers and e-mail addresses of witnesses. You may: • Send a letter to: Customer Service Manager, RIPTA, 705 Elmwood Avenue, Providence, RI 02907 • Call RIPTA Customer Service Office at (401) 781-9400. Customer Support Service is available Monday-Friday 7:00 AM-7:00 PM and Saturday from 8:00 AM-6:00 PM. • Go to RIPTA.com and download a copy of the Title VI Complaint Form to fill out and mail to the above address.

¿Qué Debe Hacer Usted Si Tiene Queja? Cualquier persona que cree ha sido ofendida por una práctica discriminatoria ilegal bajo Título VI tiene un derecho de archivar una queja formal con RIPTA. Al someter una queja, incluye por favor su información de contacto así como detalles del incidente inclusive lo que ocurrieron, donde y cuando, y los nombres, las direcciones, los números de teléfono y envíen por correo electrónico las direcciones de correo. Puede: • Envía una carta a: El Director del Servicio de atención al cliente RIPTA, 705 Providencia de la Avenida de Elmwood, RI 02907 • Llama La Oficina de Servicio de Atención Al cliente de RIPTA (401) 781-9400. La Oficina está disponible de lunes-viernes 7:00 P.M. - 7:00AM y el sábado de 8:00 P.M. AM-6:00 • Va al RIPTA.com y descarga una copia del Título VI Queja Forma para llenar y enviar a la dirección antes mencionada.

RIPTA Welcomes Your Feedback RIPTA is committed to providing safe, efficient and quality transportation services to all the communities we serve. If you have any suggestion on how we can improve on our commitment to non-discrimination, or how we can better serve the needs of customers who are not proficient in English, we would like to hear from you.

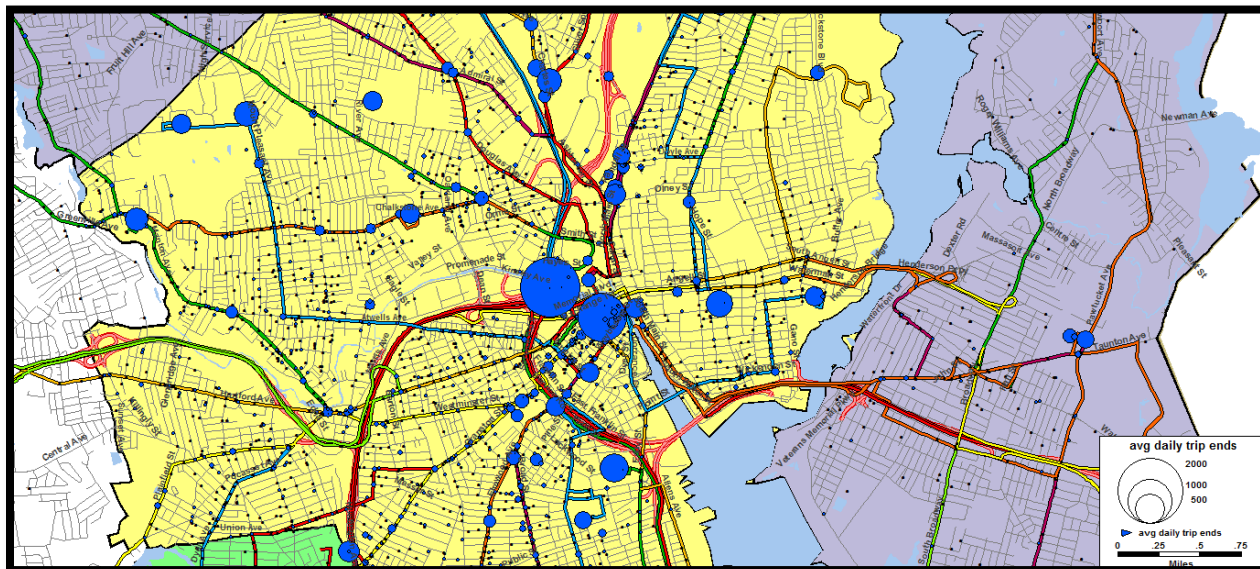
RIPTA Bienvenidos Su Retroalimentación RIPTA es comitado a proporcionar seguros, eficientes y servicios de transporte de calidad a todas las comunidades que servimos. Si tiene ninguna sugerencia en cómo podemos mejorar nuestro compromiso a la no discriminación, ni cómo podemos servir mejor las necesidades de clientes que no son capaces en inglés, queremos oír de usted.



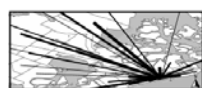
781-9400 • RIPTA.COM

Rhode Island Public Transit Authority

Rider Survey 2016



Final report
March 10, 2017



WARNER
TRANSPORTATION CONSULTING, INC.

177 Riverside Drive
Northampton, MA 01062
413 585-5026

Section 1: Introduction

Transit agencies periodically survey their passengers to understand characteristics of the riders and their trips. This information can help with service planning by helping to determine if route or schedule modifications could provide a better fit with traveler origins and destinations. Demographic data collected by a survey helps to establish if the agency complies with Title VI (environmental justice) guidelines. By measuring rider satisfaction about various service attributes, a survey can also highlight areas for agency improvements.

The Rhode Island Public Transit Authority sought in 2016 to gather information for all of these purposes from its passengers on its fixed route and flex routes services throughout the state. In August 2016, the agency contracted with Warner Transportation Consulting, Inc. to conduct this effort.

This report is the result of that assignment. Following this introduction, the report is in four parts:

Section 2: methodology;

Section 3: characteristics of the riders and trips;

Section 4: customer satisfaction ratings

Section 5: trip ends

A copy of the survey form and an extensive set of cross-tabs are in the appendix. Finally, the study has generated considerable data on trip patterns that would be useful for future route planning. This is available electronically.

Section 2: Methodology

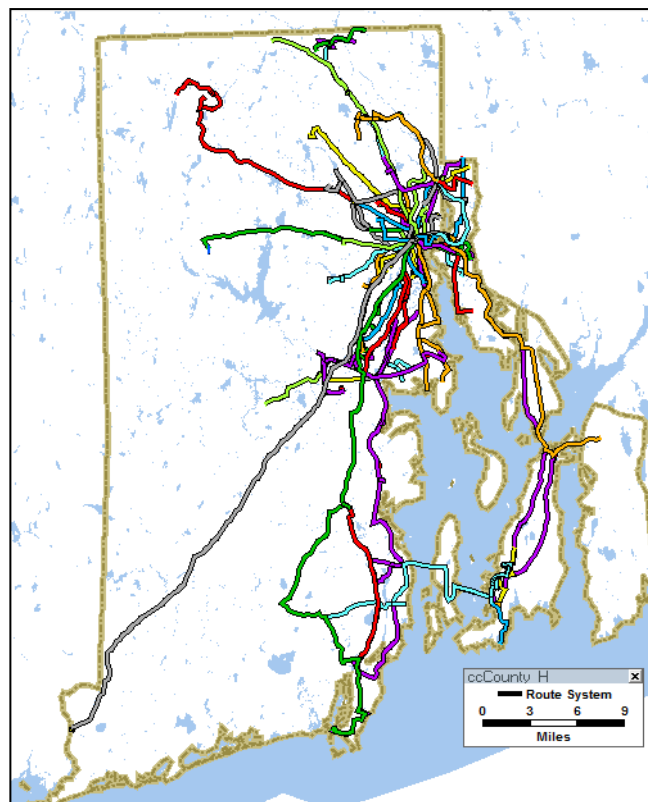
The study collected data on travel patterns, rider characteristics and attitudes through the use of on-board paper surveys. The main data collection effort occurred from September 20th to October 9th and included 11 weekdays, 3 Saturdays, and 3 Sundays. There were no national holidays or significant storms affecting travel patterns during this period.

The map at right shows the 53 fixed routes that RIPTA operated in the fall 2016. The survey occurred on 52 of these routes, with the only exception being the agency's Route 69, "the Hill Climber," a short fixed route loop service that operates exclusively on the campus of the University of Rhode Island. The survey also included the "flex" (non-fixed route) services that operate in several communities throughout the state.

The sampling plan for the fixed route service worked at the unit of the individual bus trip. No schedule trip (e.g., the weekday 7:42 AM trip of route 55) was surveyed more than once. The bus trips selected for the sample accounted for the distribution of trips in different time periods (including Saturdays and Sundays).

For most trips in the sample, on-board survey staff rode the full route (round-trip) and distributed questionnaires and pencils to passengers (except for small children) who boarded. Each survey monitor wore a tag indicating that the project was for RIPTA, and they carried a box of materials that included: (1) serial numbered surveys in English, Spanish, and Portuguese (2) pencils (3) survey trip tally sheets (4) a sign announcing RIPTA passenger survey today" in English, Spanish, and Portuguese, and tape to append this sign to the front of the fare box, (5) shift survey schedule, and (6) a card that staff could hand out to passengers who did not speak English, Spanish, or Portuguese. (The card provided a phone number where passengers speaking any of several other languages could call for further help.)

The surveyors would identify themselves to the bus drivers and tape the sign to the fare box. Passengers boarding the bus (or on the bus at the start of the survey) received a survey form (starting with the lowest serial number and going up) and a pencil and a request to complete the form. For each leg of the trip, survey staff used the tally sheet to record the route, start location, start time, end location, and the beginning and ending survey number distributed on that leg. Surveys for each leg with a tally sheet went into separate large envelopes, and the survey staff turned these into Marc Warner or Ben Heckscher, the survey supervisors, on their next break at the survey administrative hubs in either downtown Providence (Kennedy Plaza), or the transit center in Downtown Pawtucket.



The survey process for express buses and for flex routes was different. For the express buses, a survey staff person rode only on the afternoon outbound trips beginning in Downtown Providence. The surveyor distributed the questionnaire and small pencil to riders boarding on the four or five stops in the downtown loop. The surveyor would post a "return surveys here" envelope by the driver before exiting the bus at the last downtown stop (or at Tunnel & Thayer Street for the route 61X).

Survey staff did not ride the flex buses. Rather, the effort on these smaller vehicle, lower volume routes involved a display holder with the questionnaires at the side of the fare box facing the passengers as they boarded. A sign announced the "RIPTA survey today" and passengers could also take small pencils from a cup adjacent to the driver. The flex bus survey occurred on Tuesday, October 11.

The survey succeeded in eliciting the targeted number of responses with identifiable origins and destinations on most routes. For the few routes where the response rate fell short of this goal, a follow-up effort occurred on Thursday, January 26.

A copy of the English, Spanish, and Portuguese versions of the survey appears in Appendix 1.

Survey responses

The data collection effort elicited completed surveys from 6,799 riders with information including time-of-day on 10,441 one-way trips. After accounting for trip frequencies and route transfers (as specified on the surveys), these surveys translate into 75,313 weekly boardings. This is 19.7 percent of total weekly RIPTA boardings.

Survey expansion

Different trips yielded different rates of survey responses. In order to make assessments for the RIPTA system as a whole, we need to ensure a fair presentation of system-wide responses. The analysis thus begins with an expansion of survey responses to match the proportions of actual boardings by route, direction, and time-of-day as determined by a review of fare box data between September 20th and 28th, 2016.

The following three tables show the actual ridership and surveys completed by route and time of day and the final set of base weights used. These weights are the route and time-of-day shares of weekday, Saturday and Sunday ridership divided by the corresponding shares for the surveys.

Rhode Island Public Transportation Authority—2016 Origin-Destination Study

Boardings by Route

Average weekday, Saturday and Sunday boardings by route
as recorded by RIPTA fare boxes September 20 to 28, 2016

BOARDINGS route	WEEKDAY				Weekday all day	Saturday all day	Sunday all day
	open to 9 AM	9 to 3 mid	3 to 6 PM	6 to close eve			
1	1,352	1,915	1,087	566	4,920	1,587	1,095
3	332	354	326	90	1,101	567	315
6	71	241	94	16	422	109	38
8	80	4	40	2	126	-	-
9	98	202	55	3	358	-	-
10	10	8	18	-	36	-	-
11	1,981	4,086	2,206	1,308	9,581	5,763	4,063
12	26	7	25	-	57	-	-
13	94	116	88	29	327	224	168
14	189	204	194	38	626	267	-
17	400	503	386	149	1,437	650	362
18	241	149	217	50	656	117	-
19	468	635	412	200	1,715	996	540
20	843	1,477	707	310	3,338	1,376	881
21	331	700	393	218	1,642	1,024	599
22	442	614	418	171	1,645	978	692
27	526	775	499	210	2,010	1,166	791
28	369	602	448	151	1,570	808	397
29	109	244	92	19	463	259	-
30	197	285	166	103	752	425	306
31	609	1,111	766	329	2,815	1,624	1,095
32	84	112	66	15	277	-	-
33	354	555	359	197	1,465	735	621
34	97	196	148	69	510	420	149
35	146	188	133	32	498	261	136
40	39	138	60	17	254	-	-
49	5	2	12	-	19	-	-
50	508	711	522	253	1,993	889	548
51	340	584	365	212	1,501	843	582
54	372	836	413	284	1,905	1,170	750
55	246	294	226	108	873	446	241
56	611	962	680	213	2,466	1,061	607
57	302	410	292	172	1,176	863	375
58	184	165	136	34	518	324	-
59	42	48	58	1	149	-	-
60	741	982	736	504	2,963	2,331	1,669
61	65	0	5	-	70	-	-
63	103	360	171	55	689	539	176
64	68	87	92	2	248	95	-
65	76	9	46	1	131	-	-
66	303	562	373	261	1,499	935	608
67	27	504	82	16	629	542	795
69	193	1,267	74	-	1,534	-	-
71	93	265	120	20	498	407	145
72	378	660	440	126	1,604	863	486
73	52	116	49	13	230	-	-
75	66	114	67	18	264	162	112
76	27	60	38	8	132	135	-
78	183	335	216	146	880	706	279
80	44	67	20	4	135	-	-
87	137	377	131	29	674	314	302
92	692	1,080	607	379	2,757	1,230	641
95	49	5	47	0	102	-	-
203	11	12	4	0	27	-	-
204	23	29	9	4	65	-	-
210	7	22	5	-	33	10	7
211	212	748	256	30	1,247	-	-
231	4	9	1	-	14	16	-
242	16	10	11	0	37	-	-
281	49	51	20	1	121	-	-
282	2	16	5	-	23	-	-
Grand Total	15,813	27,263	15,749	7,201	66,026	33,237	20,571

Rhode Island Public Transportation Authority—2016 Origin-Destination Study

Completed Surveys by Route

Surveys attributed to more than one route or time period if respondent identified transfer route and reverse trip at a specified time-of-day. Weekday totals include records for which travel time not determined

SURVEYS	WEEKDAY				Weekday all day	Saturday all day	Sunday all day
	route	open to 9 AM	9 to 3 mid	3 to 6 PM			
1	98	336	205	87	781	140	81
3	47	119	62	39	280	62	50
6	15	74	32	11	143	18	14
8	6	6	19	1	36	2	3
9	11	13	28	1	56	2	-
10	6	8	15	1	35	10	7
11	90	497	206	82	962	284	137
12	8	-	15	-	23	1	-
13	5	32	11	7	57	31	15
14	36	42	39	6	135	29	13
17	36	124	46	42	268	48	40
18	52	38	30	13	143	41	2
19	15	143	53	17	252	49	19
20	76	177	82	37	408	91	58
21	49	195	100	32	407	125	101
22	27	104	58	26	225	47	65
27	45	165	101	44	388	105	60
28	26	75	40	31	186	40	73
29	19	61	29	12	129	26	14
30	28	81	24	11	153	95	74
31	39	197	74	41	393	109	36
32	30	35	30	8	113	12	9
33	39	120	54	25	267	132	73
34	6	36	11	4	61	49	22
35	11	39	31	5	95	35	34
40	16	33	33	8	103	3	5
49	1	13	7	5	28	10	2
50	28	142	93	39	331	81	82
51	9	97	40	24	187	102	63
54	45	129	57	34	287	95	88
55	40	73	32	24	191	74	29
56	41	184	88	28	371	87	83
57	29	77	45	19	180	69	25
58	17	44	12	5	87	45	7
59	9	-	25	1	35	-	-
60	116	183	106	46	487	168	157
61	4	4	8	-	18	1	1
63	14	31	8	3	62	38	15
64	6	24	18	13	65	21	1
65	12	1	19	-	40	-	-
66	30	138	46	37	265	66	103
67	7	27	12	2	50	41	14
69							
71	8	42	15	7	79	18	5
72	33	104	57	39	254	92	63
73	4	44	16	6	75	9	-
75	13	30	16	9	71	11	21
76	3	14	10	5	37	12	-
78	16	37	52	27	144	56	21
80	1	27	5	1	40	3	-
87	5	36	7	6	65	8	15
92	43	261	120	60	525	110	89
95	8	1	19	-	28	-	-
203					38	-	-
204					27	-	-
210							
211					71	-	-
231							
242					16	-	-
281					28	-	-
282							
Grand Total	1,378	4,513	2,361	1,031	10,281	2,803	1,889

Rhode Island Public Transportation Authority—2016 Origin-Destination Study

Base Weights by Route

Boardings divided by surveys for each route and time-of-day. Subsequent proportional scaling (used as appropriate on tables and charts in this report) accounts for weekly totals and for comparability.

unscaled base weights	WEEKDAY				Weekday all day	Saturday all day	Sunday all day
	route	open to 9 AM	9 to 3 mid	3 to 6 PM			
1	13.80	5.70	5.30	6.50	6.30	11.34	13.52
3	7.06	2.97	5.25	2.30	3.93	9.15	6.30
6	4.74	3.25	2.95	1.45	2.95	6.06	2.71
8	13.31	0.64	2.09	2.17	3.49	0.00	0.00
9	8.86	15.55	1.97	2.67	6.38	0.00	0.00
10	1.69	1.00	1.20	0.00	1.03	0.00	0.00
11	22.01	8.22	10.71	15.96	9.96	20.29	29.66
12	3.19	0.00	1.67	0.00	2.49	0.00	0.00
13	18.80	3.62	8.00	4.12	5.73	7.23	11.20
14	5.25	4.85	4.98	6.39	4.63	9.21	0.00
17	11.11	4.05	8.39	3.55	5.36	13.54	9.05
18	4.63	3.93	7.22	3.81	4.59	2.85	0.00
19	31.21	4.44	7.76	11.77	6.80	20.33	28.42
20	11.10	8.35	8.62	8.38	8.18	15.12	15.19
21	6.76	3.59	3.93	6.80	4.03	8.19	5.93
22	16.36	5.90	7.20	6.59	7.31	20.81	10.65
27	11.70	4.70	4.94	4.78	5.18	11.10	13.18
28	14.18	8.02	11.21	4.88	8.44	20.20	5.44
29	5.72	4.00	3.16	1.56	3.59	9.96	0.00
30	7.04	3.52	6.93	9.35	4.91	4.47	4.14
31	15.62	5.64	10.35	8.03	7.16	14.90	30.42
32	2.81	3.20	2.19	1.85	2.45	0.00	0.00
33	9.08	4.63	6.64	7.88	5.49	5.57	8.51
34	16.08	5.45	13.41	17.29	8.35	8.57	6.77
35	13.27	4.81	4.28	6.33	5.24	7.46	4.00
40	2.46	4.18	1.81	2.08	2.46	0.00	0.00
49	4.50	0.18	1.76	0.00	0.68	0.00	0.00
50	18.15	5.01	5.61	6.48	6.02	10.98	6.68
51	37.78	6.02	9.13	8.83	8.03	8.26	9.24
54	8.27	6.48	7.24	8.34	6.64	12.32	8.52
55	6.14	4.02	7.05	4.50	4.57	6.03	8.31
56	14.89	5.23	7.73	7.61	6.65	12.20	7.31
57	10.41	5.33	6.48	9.04	6.53	12.51	15.00
58	10.82	3.74	11.33	6.70	5.95	7.20	0.00
59	4.69	0.00	2.33	0.67	4.24	0.00	0.00
60	6.39	5.37	6.94	10.95	6.08	13.88	10.63
61	16.21	0.04	0.58	0.00	3.87	0.00	0.00
63	7.32	11.60	21.42	18.33	11.10	14.18	11.73
64	11.31	3.63	5.08	0.12	3.82	4.52	0.00
65	6.32	8.50	2.43	0.00	3.28	0.00	0.00
66	10.10	4.07	8.12	7.05	5.66	14.17	5.90
67	3.81	18.67	6.85	7.83	12.57	13.22	56.79
69	0.00	0.00	0.00	0.00	0.00	0.00	0.00
71	11.65	6.31	7.99	2.83	6.30	22.61	29.00
72	11.44	6.35	7.71	3.24	6.31	9.38	7.71
73	12.88	2.64	3.06	2.22	3.07	0.00	0.00
75	5.09	3.79	4.16	1.98	3.72	14.73	5.33
76	8.83	4.31	3.77	1.53	3.57	11.25	0.00
78	11.42	9.06	4.16	5.41	6.11	12.61	13.29
80	44.33	2.49	3.90	4.00	3.38	0.00	0.00
87	27.30	10.47	18.74	4.86	10.36	39.25	20.13
92	16.09	4.14	5.06	6.31	5.25	11.18	7.20
95	6.15	5.33	2.48	0.00	3.64	0.00	0.00
203	0.72	0.72	0.72	0.72	0.72	0.00	0.00
204	2.40	2.40	2.40	2.40	2.40	0.00	0.00
210	0.00	0.00	0.00	0.00	0.00	0.00	0.00
211	17.56	17.56	17.56	17.56	17.56	0.00	0.00
231	0.00	0.00	0.00	0.00	0.00	0.00	0.00
242	2.28	2.28	2.28	2.28	2.28	0.00	0.00
281	4.30	4.30	4.30	4.30	4.30	0.00	0.00
282	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average	11.61	6.13	6.73	7.00	6.50	12.03	11.02

Distinct weights calculated and applied

Different types of analyses will call for different weighting of the survey results. This section presents two different weighting schemes. The first weight is the one used generally in the tables, charts, and narrative presented in this report. The second is used less frequently and then as noted where appropriate.

Both of these weights aim to ensure that the survey responses are *proportionate* to the actual distribution of ridership by RIPTA route. In other words, for inferences from the survey about the system as a whole, we would want to more heavily weight the surveys from routes where the response rate was lower than average, and more lightly weight the surveys from routes where the response rate was higher than average. The weekday responses relative to the actual ridership, for example, were lower for route 21 than for route 22. For characteristics about the full RIPTA service, we thus apply a proportionally higher weight for the surveys on route 21 than we do for those on route 22.

Here are the weighting schemes as calculated and applied:

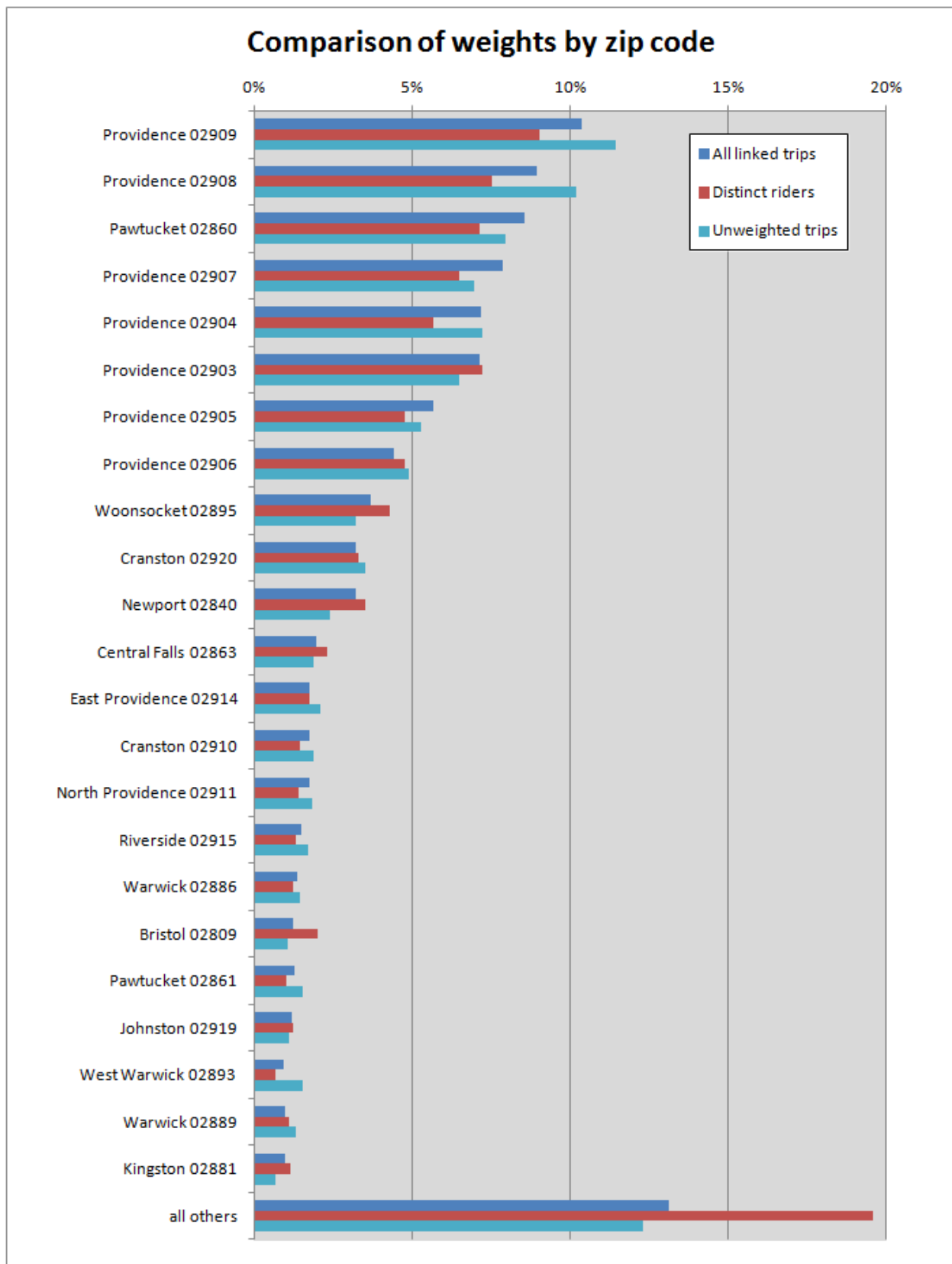
- All linked trips--These are the base weights, adjusted for the number of transfers used and then rescaled so that the sum matches the original 6799 responses. This weight ignores the frequency with which any individual traveler uses RIPTA.
- Distinct riders-- It is important to note the distinction between trips and riders. "Trips" reflect the overall travel patterns of people riding the system. "Riders" refer to the individuals that use the system, regardless of their trip frequency. As a simple illustration of this difference, consider a system with two individual bus riders. Rider A commutes by bus every weekday. Rider B takes one trip by bus each week. Over the course of the week, riders would make six round trips, but there would be only two *different* riders.

A distinct rider weight allows us to deal with under-representation in the survey sample of infrequent riders. This under-representation occurs because the infrequent rider is less likely to be on the bus on any given survey day than would a daily or other frequent rider. This does not affect characteristics of the boardings or trips, but it does bias the measures of characteristics of individual riders. The trip frequency weight applied to the survey responses of each respondent is the overall average trip frequency divided by the trip frequency of the respective survey respondent.

Note that the charts and tables in this report apply the "All linked trips" weight except for the "Distinct riders" line in the charts or as otherwise specified in the text.

Application of the weights by zip code of residence

The chart on the next page compares the unweighted and weighted distribution of survey responses according to the respondent's home zip code. The bottom grouping for "all others" aggregate the results for 218 other home zip codes, none of which accounts for more than one percent of the total in any of the weight schemes. The results show that the unweighted sample is a very close match for the linked trips weighting schemes, but less so for the weights by distinct riders. This means that a higher share of *infrequent* RIPTA riders come from communities outside the core service area around Providence.



Margin of error

The margin of error is a statistical term that measures the degree to which the results of the sample (the survey respondents) would also apply to the full relevant population (all bus riders and trips). The calculation, shown for the 90 and 95 percent confidence intervals appears in the table below. It says, for example, that we can be 90 percent confident that findings from the sample are within a maximum of 3.11 percent of the results for *all* trips on the Rapid Bus (Route R). Findings for the other route types are based on different size samples and have a higher or lower maximum margin of error. The formula for computing the maximum margin of error (with a 90 percent confidence) is 1.65 times the square root of .25 divided by the sample size.

Route Type	Margin of error 90% CI	Margin of error 95% CI	routes in respective Route Type											
Rapid Bus (Route R)	3.11	3.72	11											
Key Corridor	1.65	1.97	1	20	27	28	31	50	56	67	92			
Local KP South	2.14	2.56	3	6	17	18	19	21	22	30				
Local KP Other	2.13	2.55	32	33	34	35	40	49	51	55	57	58	72	78
Local Non-KP	3.66	4.38	13	29	63	64	71	73	75	76	80	87	211	
Regional & Express	2.44	2.92	8	9	10	12	14	54	59	60	61	65	66	95
Flex routes	8.99	10.75	203	204	242	281								
System-wide	0.93	1.11												

It is important to recognize that the calculated margin of error assumes that the survey sample is *random*. Is this a reasonable assumption? For drawing conclusions about transit use system wide, we believe it is. For certain sub-markets, it may be questionable. This is due in part to the nature of the survey. Surveying passengers on specific *bus trips* was a pragmatic (and standard) alternative to surveying a random sample of all passengers throughout the day. This latter approach would have assured that all RIPTA passengers—not just those on the selected sample of trips—would have a more equal chance to be part of the survey. The use of the bus trip as the sample unit does undermine the assumption of randomness, but we assume that the effect is a wash; i.e., that the surveyed passengers on the selected trips (distributed throughout the day) are still a fair representation of the passengers who boarded other trips.

Finally, the sample is likely to include a lower than actual share of riders who have low literacy, who had a very short bus trip, and who did not get a seat (thus making it more difficult to fill out the form). The survey process and staff sought to minimize this potential bias (surveys were available, for example, in Spanish and Portuguese), but this potential source of bias may have occurred. Again, we assume that this effect is small and does not appreciably bias the overall results.

Section 3: Rider and Trip Characteristics

Who is riding RIPTA? The survey allows us to answer this in terms of a variety of demographic and trip characteristics:

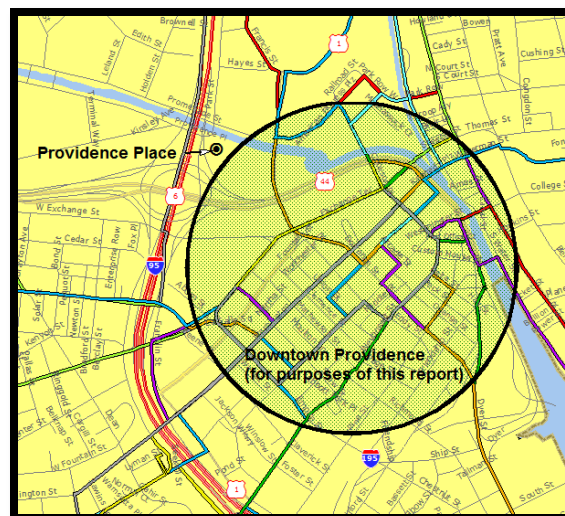
- | | |
|-----------------------|----------------------------------|
| 1. Trip frequency | 8. Home language |
| 2. Trip purpose | 9. Access to a car or motorcycle |
| 3. Residency | 10. Number of years riding RIPTA |
| 4. Sex | 11. Transit dependency |
| 5. Age | 12. Transfers |
| 6. Income | 13. Fare |
| 7. Race and ethnicity | |

This section presents details on each of these issues. For most of the characteristics, a chart shows the weighted responses for all trips, all riders, and for selected other subgroups (by trips, not distinct riders). When looking at the charts, you might want to **compare the top bar labeled “All Trips” against each of the bars below it**. This will highlight differences for the particular sub-group with characteristics found for RIPTA trips as a whole.

A note about the selected major transit trip generators

Each of the charts identifies the subgroup of trips with one end at any of 11 major transit trip generators. These major trip generators are as follows:

- Downtown Providence-- defined as the area within 3/10ths of a mile around City Hall (see map at right).
- Providence Place Mall
- University of RI
- Brown University area--defined as the area within 1/4 mile of Thayer and Angell Streets
- RI Hospital
- CCRI Providence
- Warwick Mall
- CCRI-Lincoln
- Rhode Island College
- Walmart Cranston
- CCRI Warwick



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With the exception of Downtown Providence and Providence Place, we have defined the relevant subgroup of transit trips as those with an origin or destination **within one-quarter mile** of the respective central point. This distance represents the typical maximum walking distance to a bus stop, but it also helps to ensure that addresses or intersections on different sides of a facility are counted together. Another effect of this approach, however, is to include land uses that otherwise have no connection to the particular generator. Thus, trips listed under Rhode Island Hospital include those starting or ending at nearby residences and stores.

A note about the trip purposes

The charts in this section and the tables in the appendix present the trips according to ten trip purposes, that account for both trip ends--origin and destination. These purposes are as follows:

Trip purpose	<i>One end at:</i>	<i>The other end at:</i>	Share of total trips	Share of total riders
HBW	Home	work	30.1%	23.1%
HBShop	Home	shopping	11.5%	12.6%
HBSch/Coll	Home	school or college	13.9%	11.5%
HBChldCr	Home	child care	0.8%	0.8%
HBRec	Home	recreation / social	6.7%	8.3%
HBMed	Home	medical	10.1%	11.1%
HBO	Home	other	10.2%	12.3%

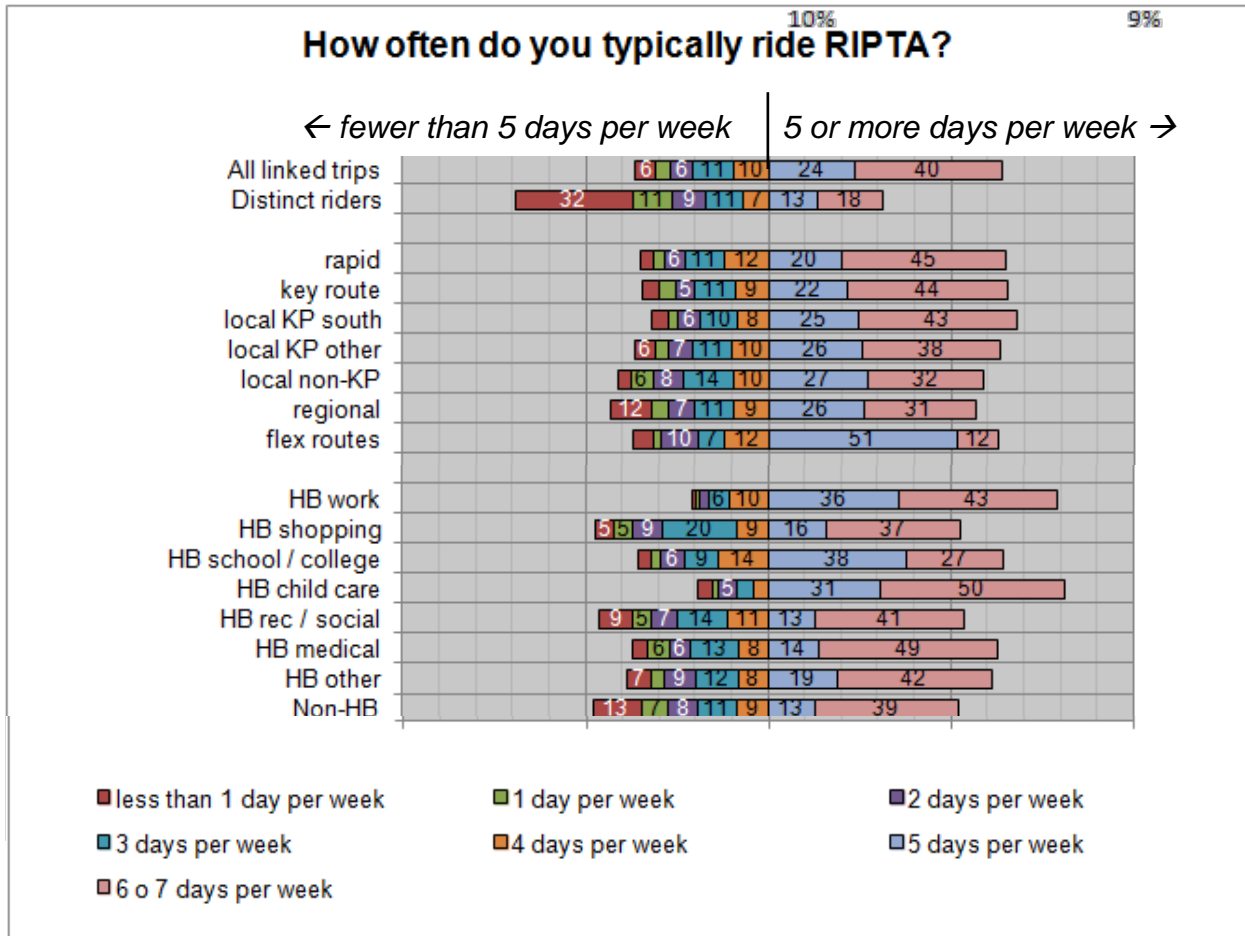
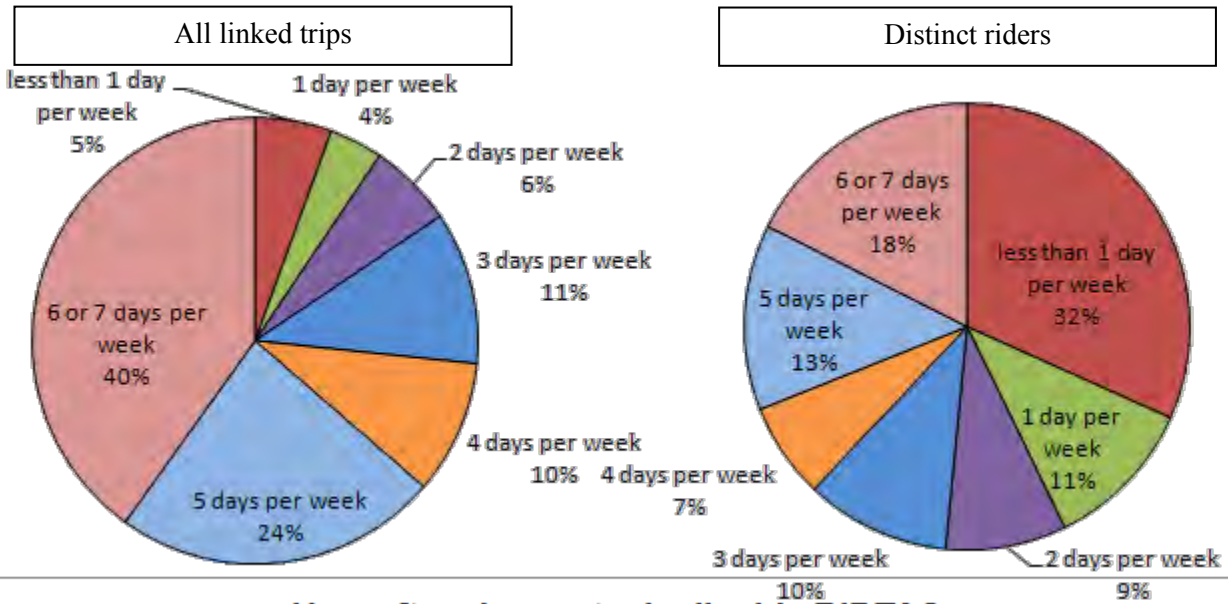
Trip purpose	<i>Neither end at:</i>	<i>One end at:</i>	Share of total trips	Share of total riders
NHBOther	Home	other	16.5%	20.3%

All trip purposes 100.0% 100.0%

The “other” end for HBO trips includes any activity not specifically mentioned in the other categories. Non-home-based other (NHBOther) trips are generally for all trips that have neither end at a traveler’s home.

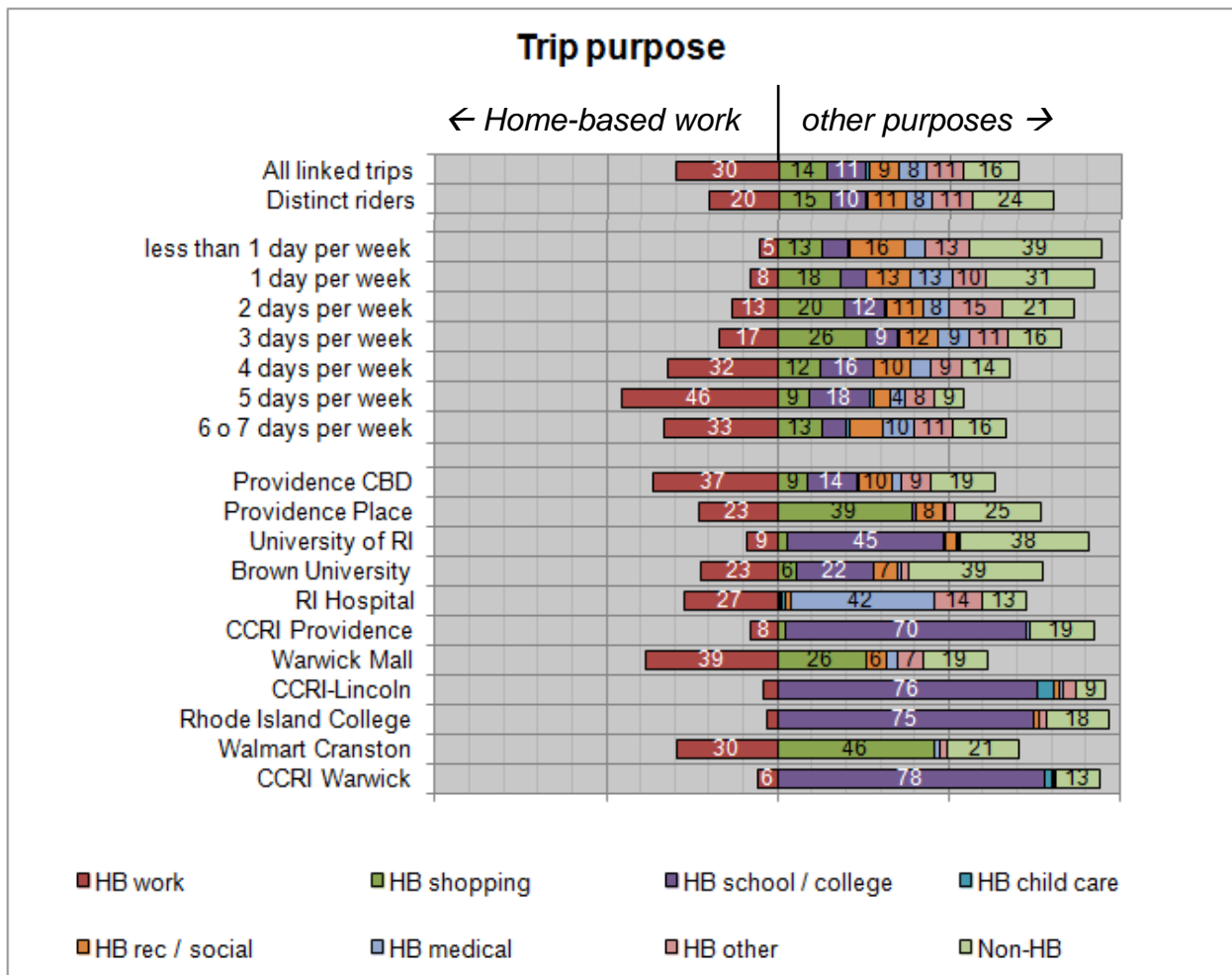
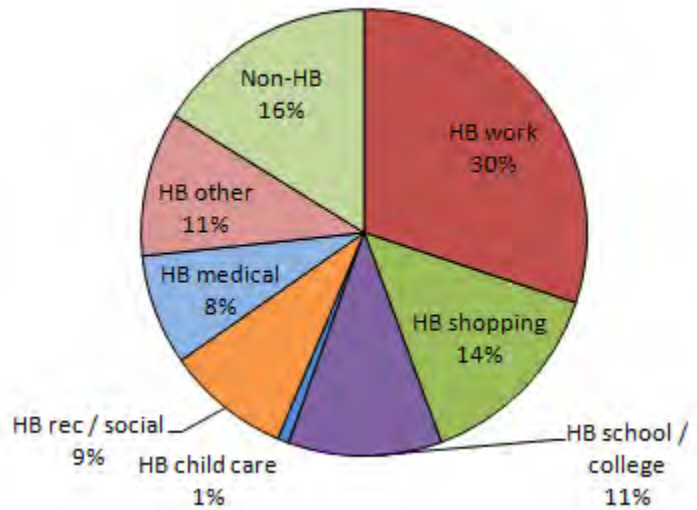
Trip frequency

- Almost two-thirds of RIPTA trips (64 percent) are by riders who make their trip by bus five or more days per week.
- These high frequency riders, however, account for only 31 percent of different RIPTA users. Over 40 percent of the different RIPTA riders (43 percent) use the system one day or less per week.



Trip purpose

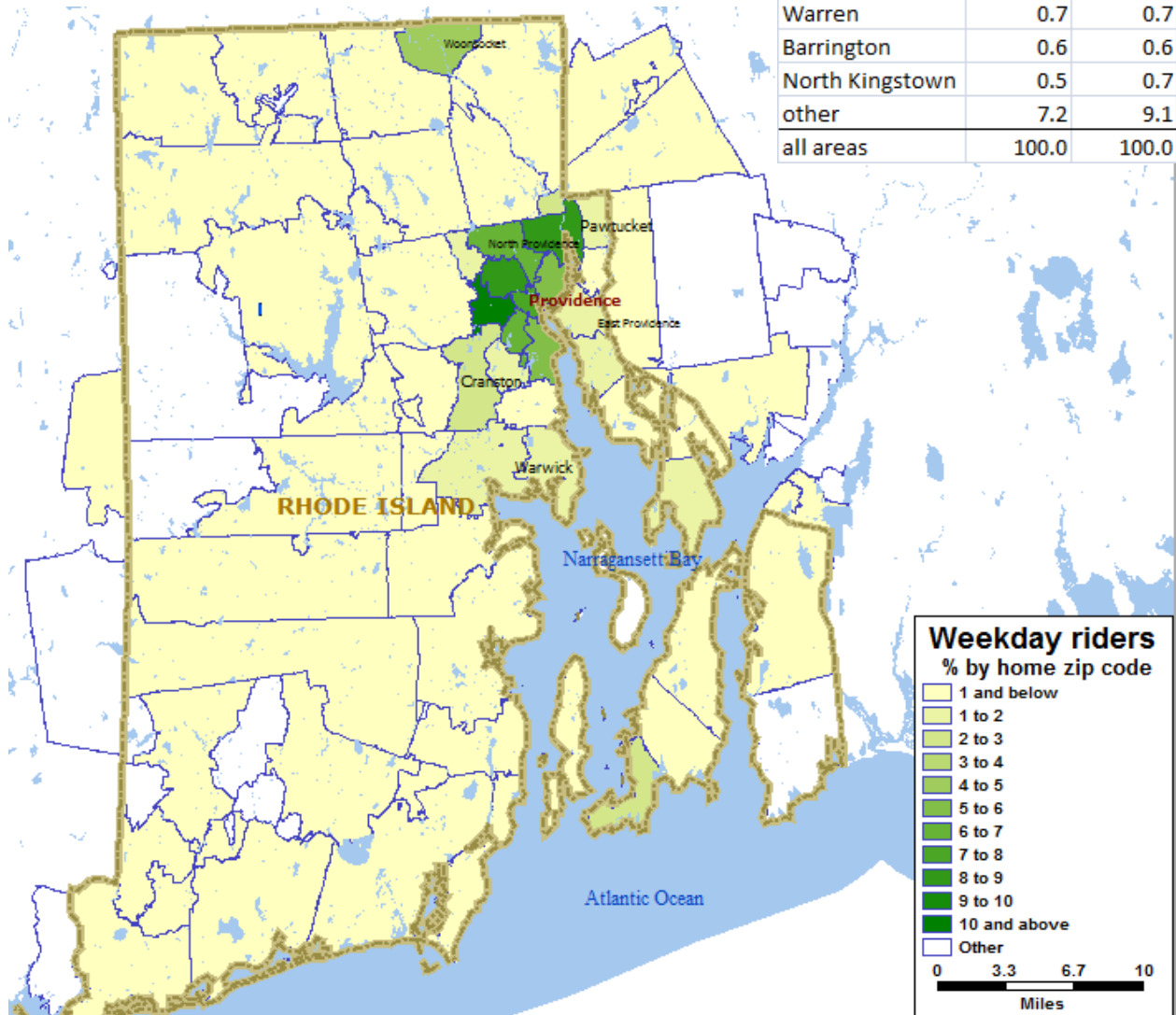
- Only 30 percent of RIPTA trips are for commuting between home and work (HB work).
- For trips with an end in Downtown Providence, the rate is higher than the average, but still only 37 percent of these trips are part of the journey between work and home.
- The commute accounts for 39 percent of the bus trips to the Warwick Mall.



Residence

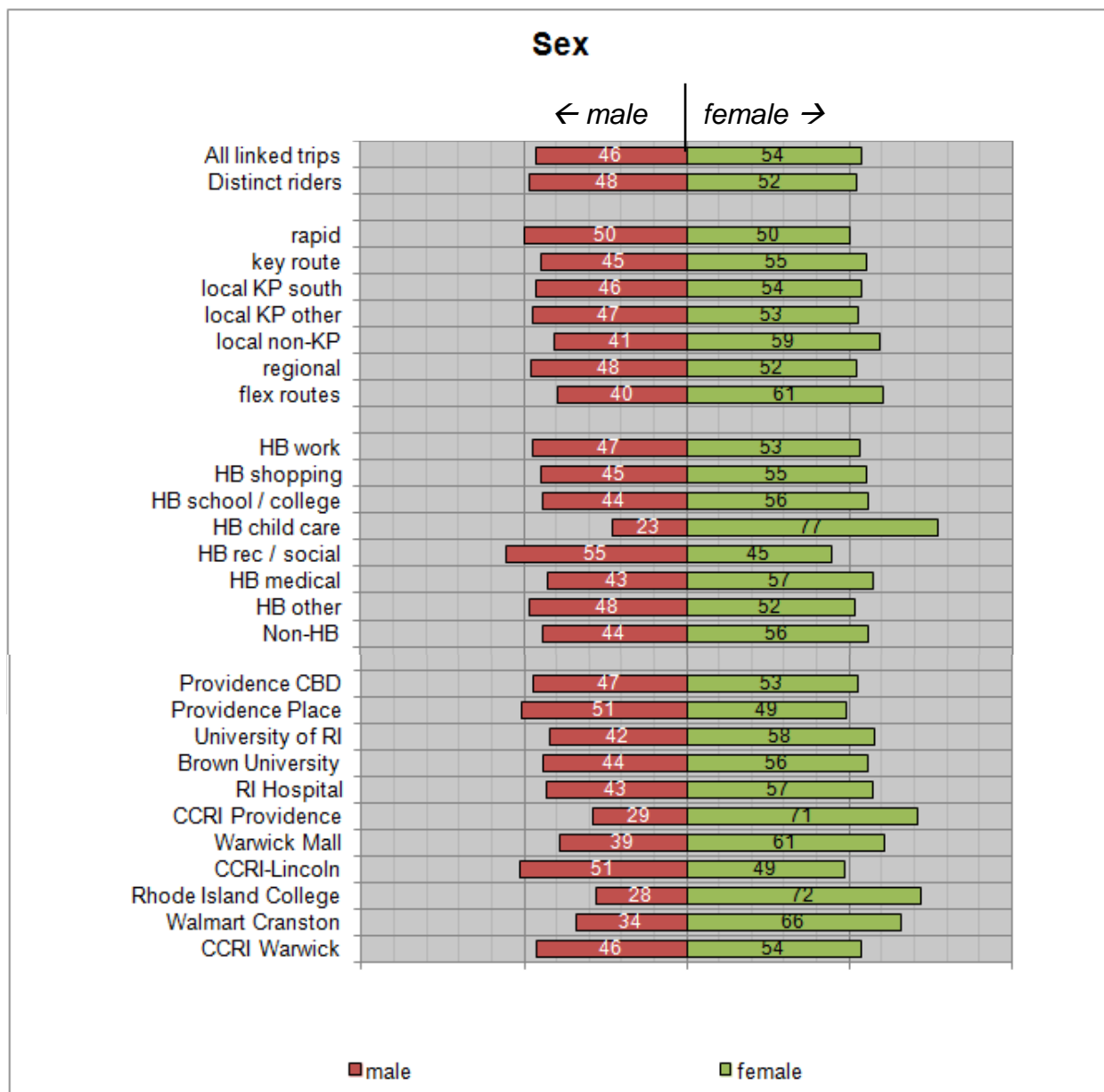
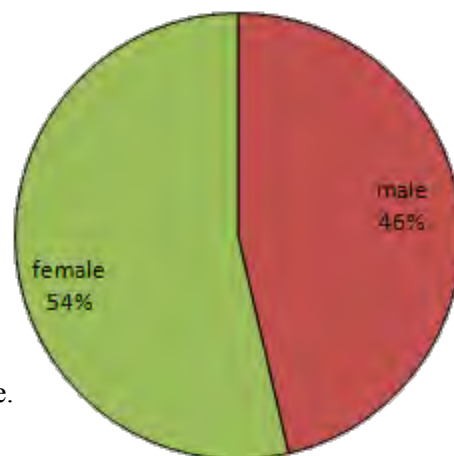
- Over half of all RIPTA trips are by residents from Providence.
- Residents from just five cities--Providence, Pawtucket, Cranston, Warwick, and Woonsocket--account for three-quarters of total RIPTA trips.

<i>Percent of travelers by residence</i>		
	All trips	Distinct riders
Providence	52.9	49.2
Pawtucket	10.3	8.9
Cranston	5.3	5.7
Warwick	3.1	3.1
Woonsocket	4.0	5.0
Newport	3.3	3.9
Riverside	1.6	1.8
Central Falls	2.3	2.9
North Providence	1.8	1.7
East Providence	1.6	1.6
Bristol	1.5	2.2
West Warwick	1.2	1.0
Johnston	1.3	1.1
Wakefield	0.7	0.7
Warren	0.7	0.7
Barrington	0.6	0.6
North Kingstown	0.5	0.7
other	7.2	9.1
all areas	100.0	100.0



Sex of passengers

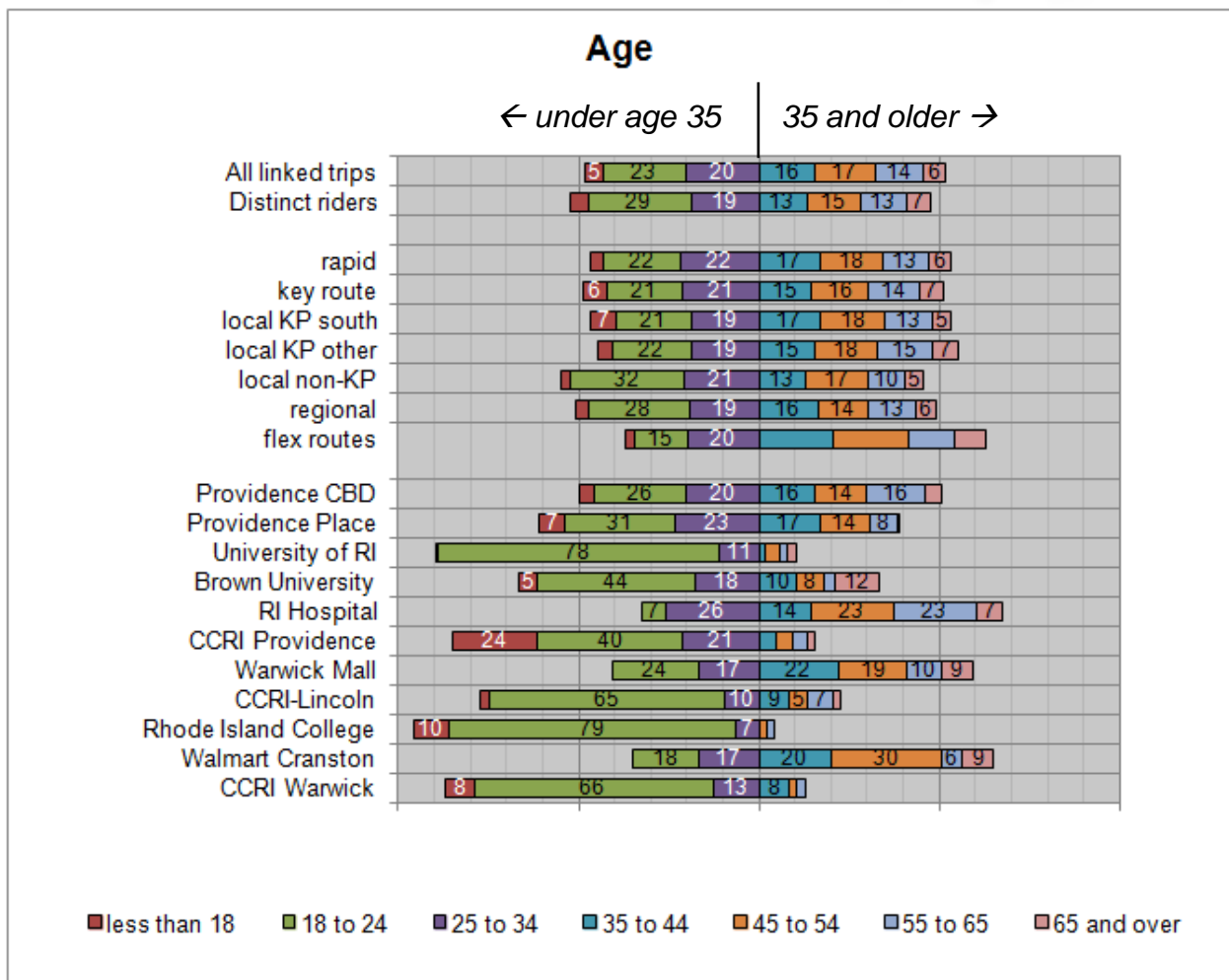
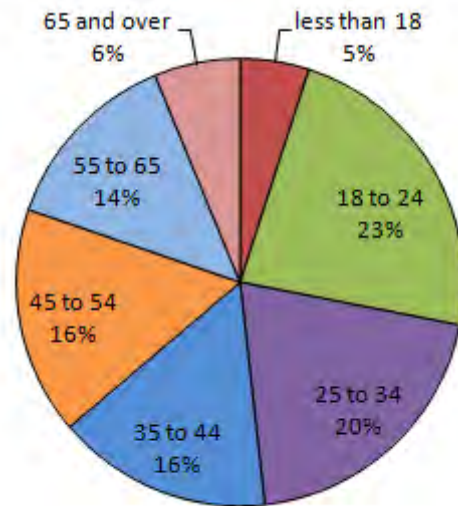
- Females make up 54 percent of the average RIPTA bus load, and a slightly lower share (52 percent) of all distinct RIPTA riders.
- For each of the sub-markets examined, males comprise a majority of RIPTA passengers only for trips for social/recreational purposes, and a bare majority of the trips to Providence Place and CCRI-Lincoln.
- Over 70 percent of the boardings are female on the flex routes, for child care, and to CCRI-Providence and Rhode Island College.



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Age

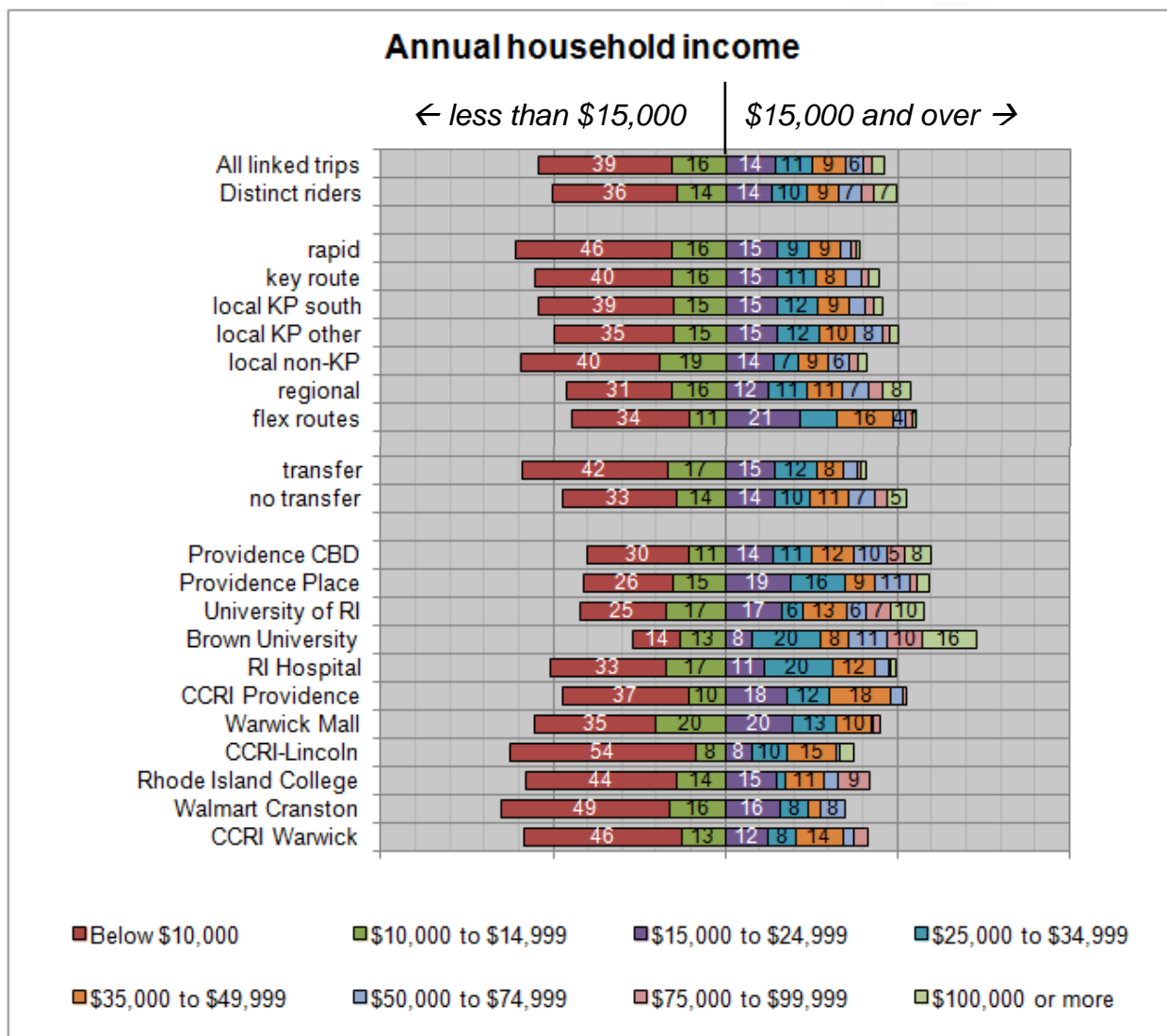
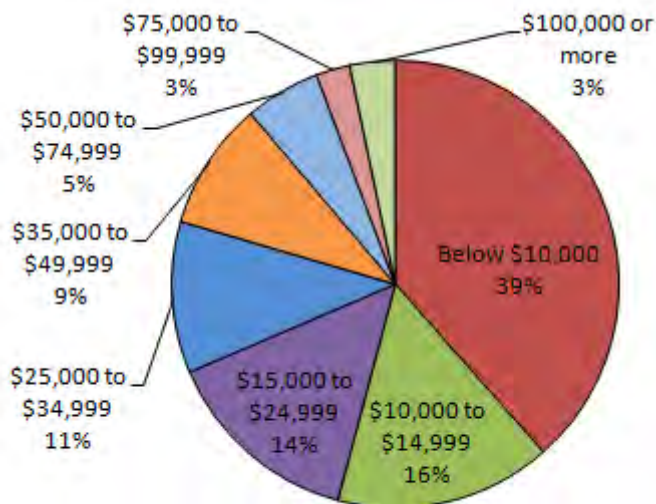
- Survey staff did not hand questionnaires to small children (under about age 15). Among the other travelers, 48 percent of the trips, and 52 percent of the distinct riders are under age 35.
- As expected, the home-based school/college trips skew the youngest. The 24 percent of trips by people under age 18 shown for CCRI-Providence relates to the high school age students at the adjacent Met School.



Rhode Island Public Transportation Authority—2016 Origin-Destination Study

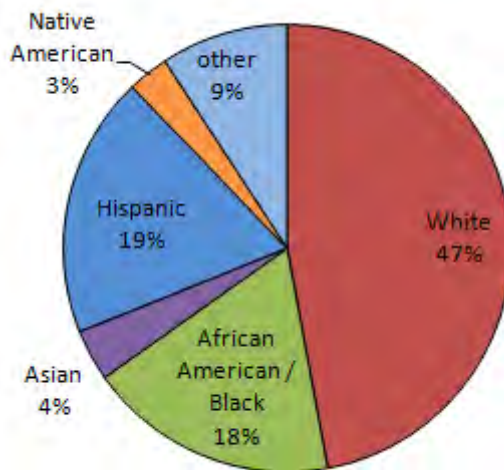
Income

- Over half of all RIPTA trips are by travelers with annual household incomes under \$15,000 per year, and 39 percent report annual household incomes of less than \$10,000.
- The R Line has a higher share of these lowest income riders than any of the other route types.
- The regional and flex services, and the travelers with a trip end near Brown University are much wealthier.

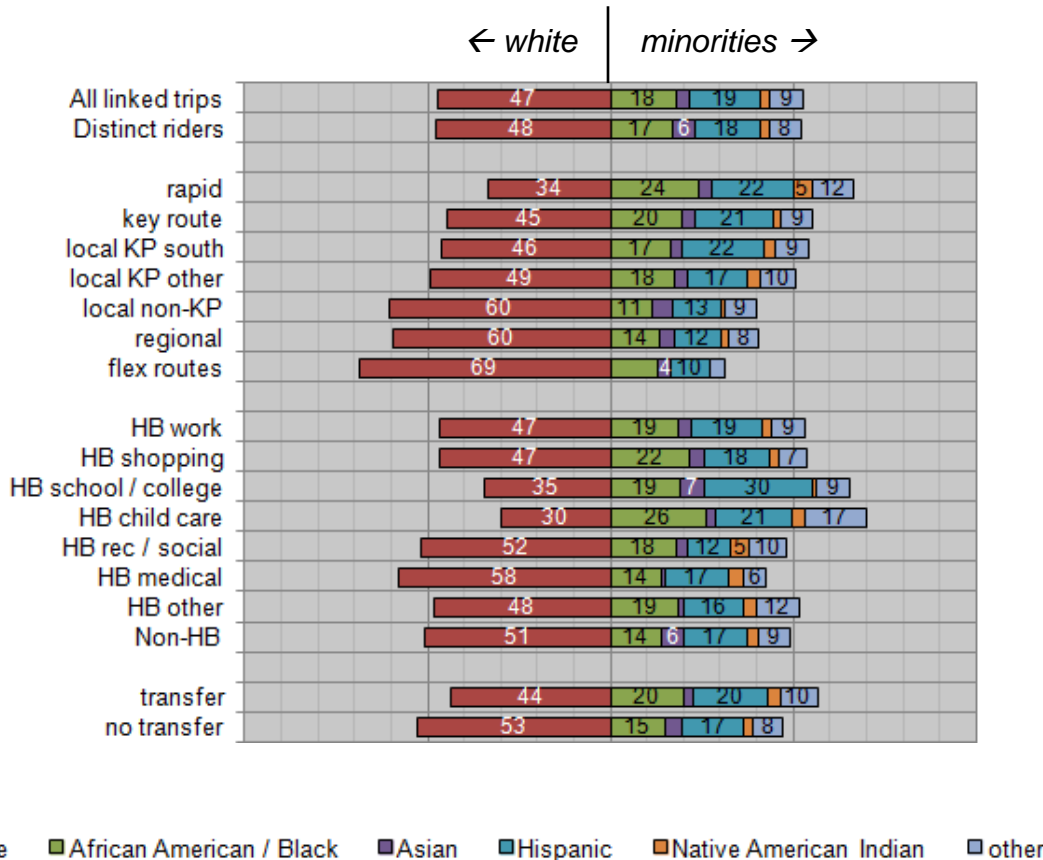


Race and Ethnicity

- Minorities account for a slight majority of RIPTA trips (53 percent) and distinct riders (52 percent).
- This rate is not consistent across route types. The rapid (R Line) has a much higher percentage of minorities, and most trips on the local non-Kennedy Plaza, regional, and flex routes services are by white travelers.

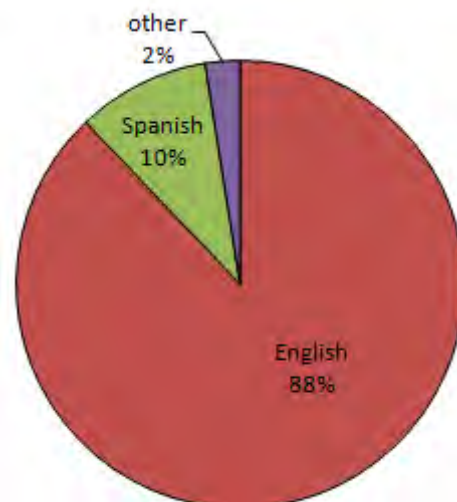


How would you describe your race / ethnicity?



Home Language

- Almost nine of ten RIPTA travelers speak English at home.
- Ten percent of RIPTA travelers speak Spanish at home. and smaller shares use other languages at home.



language	percent	language	percent
English	87.94%	ASL	0.03%
Spanish	9.65%	Filipino	0.03%
Portuguese	0.32%	Korean	0.03%
French	0.27%	Danish	0.02%
Creole	0.22%	Sicilian	0.02%
other	0.21%	Thai	0.02%
Nepali	0.19%	Greek	0.01%
Chinese	0.16%	Urdu	0.01%
German	0.11%	Bulgarian	0.01%
Russian	0.09%	Cambra	0.01%
Arabic	0.08%	Haitian	0.01%
Vietnamese	0.07%	Indonesia	0.01%
Hindi	0.05%	Japanese	0.01%
Tigrigna	0.05%	Nonya	0.01%
Cambodian	0.05%	Rhoner	0.01%
Bangla	0.04%	Sinhala	0.01%
Cape Verdean	0.04%	Halina	0.00%
Italian	0.04%	Macedonian	0.00%
Cantonese	0.04%	Naragansett	0.00%
Igbo	0.04%	Nepalese	0.00%
Kirundi	0.04%	Serbian	0.00%
Patuah	0.04%	Ukrainian	0.00%
Sinhalese	0.04%		

**RESOLUTION BY THE BOARD OF DIRECTORS OF THE RHODE ISLAND
PUBLIC TRANSIT AUTHORITY**

WHEREAS, The Rhode Island Public Transit Authority ("RIPTA") is a body corporate and politic created by R.I.G.L § 38-18, *et seq.* for the purpose of providing statewide public transit services;

WHEREAS, RIPTA, as the recipient of federal funds from the Federal Transit Administration (the "FTA"), must submit reports regarding its compliance with Title VI of the Civil Rights Act of 1964 every three years;

WHEREAS, in April 2015, the Board of Directors approved RIPTA's Title VI Program for 2015-2018 (the "Program");

WHEREAS, RIPTA then submitted the Program to the FTA, which advised that certain changes should be made to the Program;

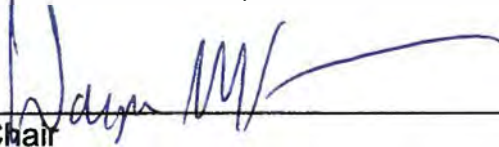
WHEREAS, RIPTA made the required changes to the Program, and the Board of Directors approved re-submission of the Program in January 2016;

WHEREAS, the FTA has since advised that the Board of Directors must separately approve RIPTA's Service and Fare Equity Analysis Policy, which is included in the Program, and submit such approval to the FTA;

WHEREAS, the Board of the Directors of RIPTA wishes to approve this Policy so that it may be submitted to the FTA;

NOW THEREFORE, in light of the foregoing, it is hereby RESOLVED by the Board of Directors of the Rhode Island Public Transit Authority that RIPTA's Service and Fare Equity Analysis Policy is approved and shall be submitted to the FTA.

On Behalf of the Rhode Island Public Transit Authority, the Chairman of the Board of Directors, has executed this Resolution as of the 28th day of June 2016.



Chair

SERVICE & FARE CHANGE EQUITY ANALYSES, JANUARY 2016 – MARCH 2018

Pursuant to FTA Circular 4702.1B, transit providers must include in their Title VI Programs the results of equity analyses for all major service changes and/or fare changes implemented since the last Title VI Program submission. In compliance with this requirement are the following:

- A list of major service or fare changes since the last Title VI Program submission.
- Copies of all service and fare equity (SAFE) analyses prepared in association with these changes.

Major Service Changes

RIPTA has implemented a total of three major service changes since the adoption of its previous Title VI Program in 2016. Below is a list of these major service changes.

RIPTA Major Service Changes

Choose Up	Minority Route	Low Income Route
Winter 2016 (No major service changes)		
Summer 2016 (No major service changes)		
Fall 2016 (Effective 9/3)		
52 Branch Avenue	Yes	No
Winter 2017 (Effective December 24)		
70 URI (new service)	No	No
Summer 2017 (Effective June 17) (No major service changes)		
Fall 2017 (Effective date 9/2)		
62 URI	No	No
Winter 2018 (Effective January 13) (No major service changes)		

Fare Changes

In January 2016, RIPTA's Board of Directors approved increasing the fare charged to Reduced Fare Bus Pass Program participants from \$0.00 to \$0.50. This decision was made as part of a comprehensive fare schedule upgrade and after consideration of a fare change equity analysis. RIPTA began collecting this fare on February 1, 2017. On July 1, 2017, this fare was rolled back to \$0.00. Because the SAFE analysis conducted prior to implementing the fare increase indicated a disproportionate burden on low-income riders, no further analysis was conducted prior to approving the fare rollback.

Service and Fare Equity (SAFE) Analyses

Following are RIPTA's SAFE analysis narratives and worksheets for the three major service changes implemented since the adoption of the previous Title VI Program.



Title VI Service Change Equity Analysis (Revised) Fall 2016 Choose-Up

Finding:

For the Fall 2016 choose-up, eight proposed service changes meeting the “major service change” threshold were analyzed to determine whether they might negatively impact minorities or low income individuals. One proposed change, the elimination of Route 52, has been found to have a disparate impact on minorities.

Background:

On January 15, 2016 the RIPTA Board of Directors approved an updated Title VI Program in keeping with the requirements of Federal Transit Agency (FTA) Circular 4702.1B. Pursuant to this Program, service changes meeting the definition of “Major Service Change” must be analyzed to determine their potential for negatively impacting minorities or low income populations.

RIPTA defines major service change as follows:

1. The establishment of new transit lines
2. Within an 18 month period, cumulative increases or decreases of more than 25% in the annual transit revenue vehicle miles operated on a corridor
3. Within an 18 month period, cumulative increases or decreases of more than 25% in the annual number of service hours scheduled on a corridor

Once a major service change has been identified, potential adverse effects are considered. RIPTA defines an adverse effect as a geographical or time-based reduction in service impacting more than 20 passengers that includes:

1. Span of service reductions of more than one hour total
2. Frequency reductions of more than fifty percent (50%)
3. Route segment eliminations that results in a walk of over 1/2-mile to the nearest bus stop from the former stop
4. Re-routing that results in a walk of over 1/2-mile to the nearest bus stop from the former stop
5. Route elimination

Service changes with adverse effects are then analyzed to determine whether the change will have a disparate impact on minority populations or a will place a disproportionate burden on low income populations.

Pursuant to RIPTA's policy, a disparate impact occurs when more than 33.6% of the population bearing adverse effects belongs to minority groups. This policy is designed to reflect populations that meaningfully exceed the statewide service area average of 23.6% minority.

RIPTA defines a disproportionate burden as occurring when more than 23.6% of the population bearing adverse effects belongs to low-income groups. This policy is designed to reflect populations that meaningfully exceed the service area average of 13.6% low-income individuals, based on 2010 U.S. Census data. The disproportionate burden policy applies only to low-income populations that are not also minority populations.

RIPTA has created a profile for each of its routes using 2010 U.S. Census data, indicating the potential minority and non-minority ridership within Census blocks intersecting a half-mile radius of bus stops. The table below lists RIPTA's routes serving populations exceeding the minority and/or low income thresholds noted above.

Routes Meeting Thresholds for "Minority/Low Income" Route Status

Route	Minority	Low Income	Route	Minority	Low Income
1	Yes		50	Yes	Yes
3			51	Yes	
6	Yes	Yes	52	Yes	
8X			54		
9X			55	Yes	
10X	Yes	Yes	56	Yes	Yes
R Line	Yes	Yes	57	Yes	
12X			58		
13			59X		
14			60		
17	Yes	Yes	61X		
18	Yes	Yes	63		
19	Yes	Yes	64		
20	Yes	Yes	65X		
21			66		
22	Yes		67		
27	Yes	Yes	71	Yes	
28	Yes	Yes	72	Yes	Yes
29			73	Yes	
30	Yes		75	Yes	
31	Yes	Yes	76	Yes	
32			78		
33			80	Yes	
34			87		Yes
35			92	Yes	Yes
40			95X		
49		Yes			

The above policies were developed with the participation of members of Rhode Island's minority, low-income, and limited English proficiency (LEP) communities; RIPTA commits to maintaining an ongoing relationship with organizations representing these communities as well as inviting public comment on proposed fare changes and major service changes.

Proposed Major Service Changes for Fall 2016 Choose-Up

Three times each year, RIPTA makes adjustments to service in response to changing community conditions, demand for service, and to optimize transit operations consistent with RIPTA's adopted service standards. For the Fall 2016 choose-up, eight proposed changes meet the definition of major service change.

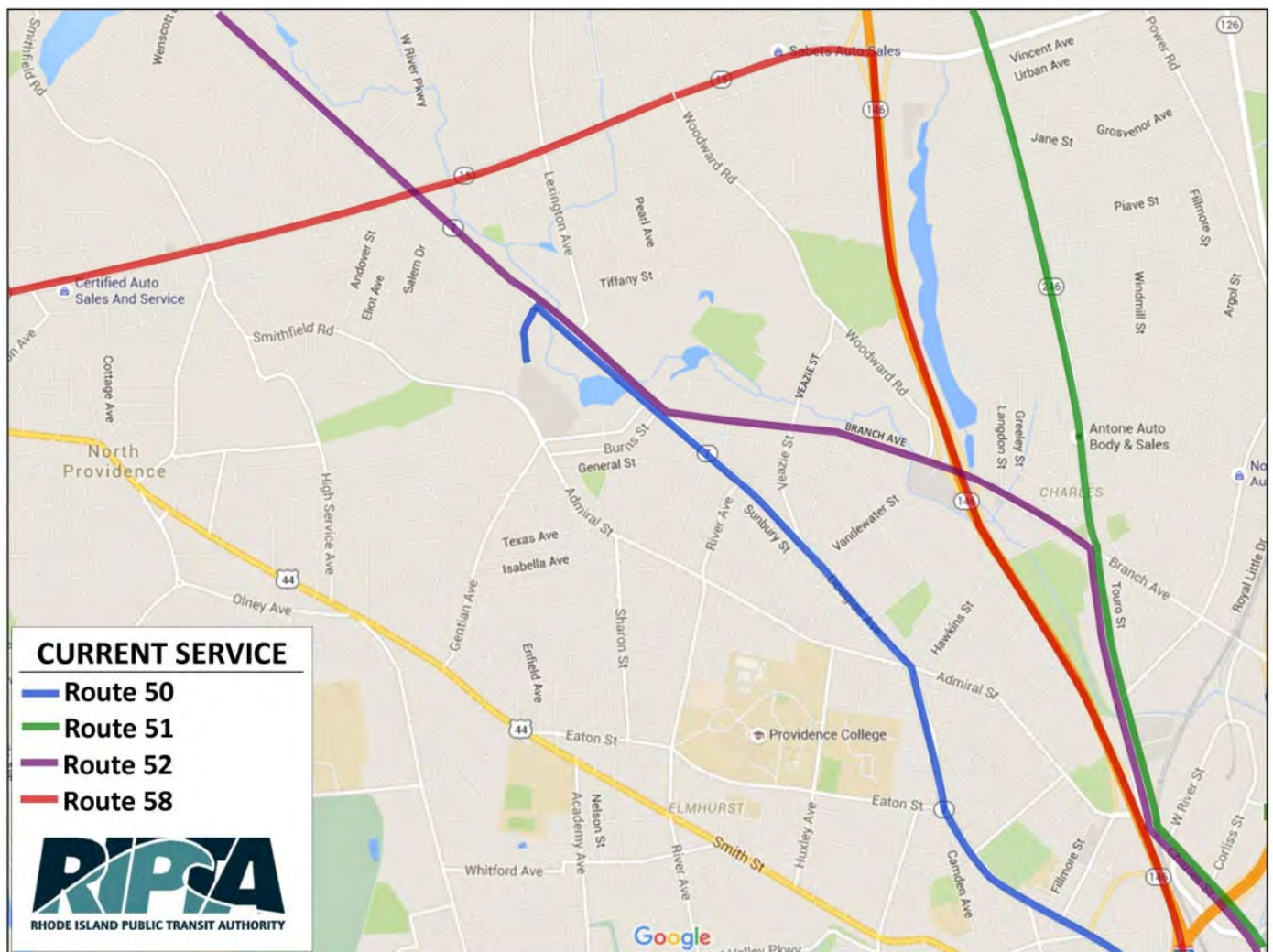
- **Route 32 East Providence/Wampanoag:** Routes 32 and 34 are proposed to be merged into one route, Route 34, resulting in the elimination of Route 32. The new Route 34 would maintain coverage to the same areas as Route 32.
- **Route 33 Riverside:** Frequency reduction of 25%; rerouting to be part of the service trunk connecting the east side of Providence to East Providence.
- **Route 34 East Providence:** Routes 32 and 34 are proposed to be merged into one route, Route 34. The new Route 34 will cover the same areas as Route 32, and be extended to provide new access to jobs and shopping in Seekonk, MA.
- **Route 40 Butler/Elmgrove:** Route is proposed to be merged with Route 92 Federal Hill/East Side. The merger would result in an increase of service frequency from 60 minutes to 40 minutes.
- **Route 50 Douglas Avenue:** This route is proposed to merge with Route 52, operating along its current alignment to Shaw's on Douglas Avenue, operating every 20 minutes as it currently does, and every other trip continues to Bryant University.
- **Route 52 Branch Avenue:** This route is proposed to merge with Route 50. Service to Bryant University would be on Route 50; service on Branch Avenue would be on a revised Route 58 alignment, and service on Charles Street would continue to be Route 51, along with the revised Route 58.
- **Route 66 URI/Galilee:** Increase in service hours of about 25% to accommodate anticipated increase in ridership due to the opening of a new nursing school in Providence.
- **Route 92 Federal Hill/East Side:** The 92 is proposed to be rerouted and merged with Route 40. Eastbound from Kennedy Plaza via Memorial Boulevard to Eddy Street, turns east to Point Street and Wickenden Street, then via Wayland Avenue to Wayland Square and continue north via the current Route 40 alignment. This option solves some longstanding scheduling problems with Route 40 while maintaining service to the same markets. The 20 minute frequency currently on Route 92 is maintained, and service to Butler Hospital would increase from 60 to 40 minutes.

Of these major service changes, three have been determined to have potentially adverse effects: Routes 32, 40, and 52. Of these three, only one involves either a minority or low income route: Route 52. The following section of this report provides a service equity analysis of the proposed changes to Route 52.

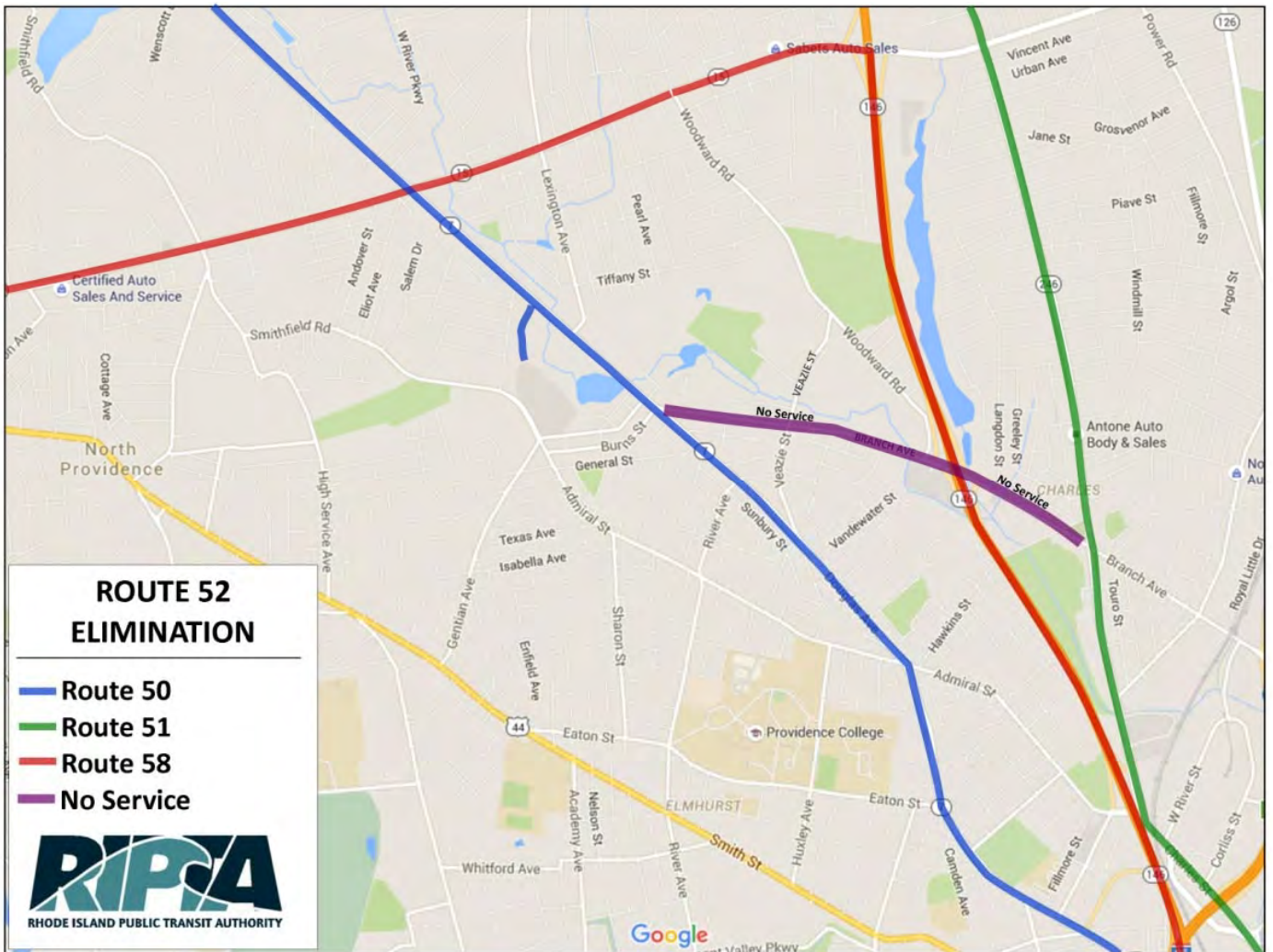
Route 52 Title VI Service Change Equity Analysis

Proposed Service Change: Route 52 is proposed to merge with Route 50, with service to Bryant University on Route 50, service on Branch Avenue on a revised Route 58 alignment, and service on Charles Street continuing to be provided on Route 51, along with the revised Route 58. The following maps depict (1) current service in the affected area, (2) simple elimination of Route 52, and (3) the proposed enhanced service plan.

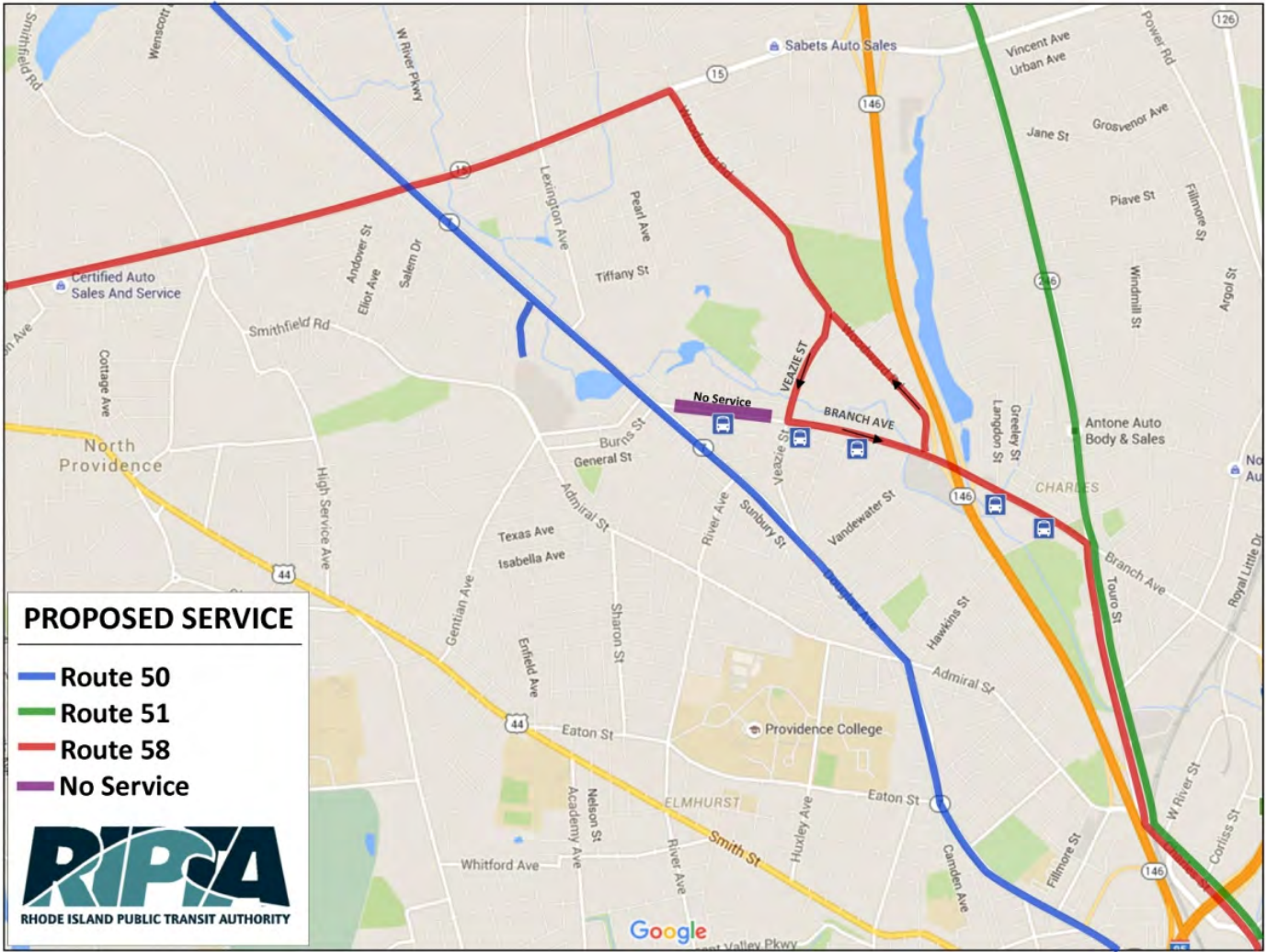
Current Service



Elimination of Route 52



Proposed Enhanced Service Plan



Although rerouting Route 58 maintains coverage to most of Branch Avenue, the frequency is not equivalent. Route 52 currently operates an irregular schedule, with an average frequency of every 43 minutes weekdays, 80 minutes on Saturdays, and 75 minutes on Sundays. On weekdays, Route 58 operates every 50 minutes in the peak and about every two hours midday. There is no Saturday or Sunday service.

There are a total of 97 boardings on Branch Avenue inbound weekday trips. The table below shows the average boardings per weekday on inbound Route 52 trips. Based on the current service proposal, only the stop located near side Wild Street would no longer be served. This stop is about a 950-ft walk to the nearest bus stop on Douglas Avenue.

Bus Stop	Inbound Boardings/Alightings
Branch Avenue near side Wild Street	15 / 0
Branch Avenue far side Veazie Street	33 / 2
Branch Avenue near side Abram Street	40 / 8
Branch Avenue opposite #525 Branch Avenue	9 / 5
Branch Avenue far side Hawkins Street	0 / 1

Service Change Rationale: In 2012, RIPTA conducted a Comprehensive Operational Analysis which recommended, among other proposed service adjustments, the consolidation of Routes 52 and 50, as follows:

ROUTE 52 | BRANCH / BRYANT UNIVERSITY

Route 52 operates between Bryant University in Smithfield and Kennedy Plaza in downtown Providence, traveling primarily on Douglas Turnpike, Douglas Avenue, Branch Avenue and Charles Street.

Proposed Changes: To reduce duplication and provide more consistent service, Route 52 would be combined with Route 50 Douglas Avenue and extended to Bryant University via Douglas Pike, with a combination of short trip service to the North Providence Shaw’s and long trip service to Bryant College.

- Consolidate Route 52 with Route 50 Douglas service by extending Route 50 to Bryant University along Route 52’s alignment on Douglas Avenue and Douglas Pike. The merged route would be designated Route 50 Douglas/Bryant College.
- Alternate weekday daytime service between long trips to Bryant University, and short trips to the Shaw’s on Smithfield Road, with service to Shaw’s every 22-23 minutes and to Bryant University every 45 minutes
- Operate all weekday evening and weekend service every 45 minutes between Bryant University and downtown Providence.
- Decouple Route 50 and Route 28 Hartford to allow service levels to be better matched with demand and to improve on-time performance.
- Provide service to the main entrance of Fidelity Investments in Smithfield on select AM and PM trips.
- Discontinue poorly utilized Metcalf Court variant service in Providence to enable the provision of service with consistent schedules.

(Source: RIPTA 2013 COA, Nelson\Nygaard Consulting Associates Inc.)

ROUTE 50 | DOUGLAS AVENUE (RENAME ROUTE 50 DOUGLAS AVE/BRYANT UNIVERSITY)

Route 50 Douglas Ave provides service between the Shaw's supermarket on Smithfield Road in North Providence and Kennedy Plaza.

Proposed Changes: To reduce duplication and provide more consistent service, Route 50 would be combined with Route 52 Branch Avenue/Bryant University and extended to Bryant University via Douglas Pike:

- Consolidate Route 50 with Route 52 Branch Avenue service by extending Route 50 to Bryant University along Route 52's alignment on Douglas Avenue and Douglas Pike. The merged route would be designated Route 50 Douglas/Bryant College.
- Alternate weekday daytime service between long trips to Bryant University, and short trips to the Shaw's on Smithfield Road, with service to Shaw's every 22-23 minutes and to Bryant University every 45 minutes
- Operate all weekday evening and weekend service every 45 minutes between Bryant University and downtown Providence.
- Decouple Route 50 and Route 28 Hartford to allow service levels to be better matched with demand and to improve on-time performance.
- Provide service to the main entrance of Fidelity Investments in Smithfield on select AM and PM trips.

(Source: RIPTA 2013 COA, Nelson\Nygaard Consulting Associates Inc.)

The above recommendations are substantially the same as what is currently being proposed with two exceptions. The first difference is that proposed frequency would improve to 20 minutes on short trips, and every 40 minutes on the longer trips to Bryant University. The second major difference is that RIPTA proposes to continue providing service to all of Branch Avenue by re-routing route 58.

Extending Route 50 every other trip to serve Bryant University, and removing Route 52 from this service area, results in a more consistent frequency and therefore more easily predictable service. However, by doing this, Route 52 would only then exist to serve a 1.15-mile portion of Branch Avenue. Therefore, not eliminating route 52 would be inconsistent with RIPTA's service standards and would be an unjustifiable duplication of service.

Alternatives Analysis: Several alternatives were considered in scoping this route change proposal but were found not to be feasible due to issues such as road geometry. For example, RIPTA explored serving a portion of Branch Avenue by operating via Douglas Avenue to Branch Avenue but it was found that this turn cannot be safely made by a 40-foot bus. Other nearby streets were also found to be problematic for fixed route bus service. No alternative was identified that could provide the overall operational benefit to the system while providing a less disparate impact to minorities. See "Mitigation Measures" below for additional discussion regarding alternatives considered.

Finding of disparate impact: Because Route 52 meets RIPTA’s adopted threshold for “minority route” status, serving a minority population more than 33.6% higher than that of RIPTA’s service area average minority population of 23.6%, the proposed elimination of Route 52 will have a disparate impact on minorities.

Geographic Area	% Minority
Route 52 Service Area	39.8%
RIPTA Statewide Service Area	23.6%

Note: 2010 U.S. Census data; minority population within Census blocks intersecting a one-half mile radius of bus stops.

Mitigation Measures: Because simply eliminating Route 52 would have a substantial adverse effect on RIPTA’s riding public, especially minority riders, the proposed service change incorporates modifications to Routes 50 and 58 to mitigate the negative impacts of the route elimination.

As part of this service change, RIPTA decided it is important that some level of service on Branch Avenue be maintained. This resulted in an initial proposal to reroute bus 58 to serve the majority, but not all, of the bus stops on Branch Avenue. It was proposed, and presented during the public hearing process, that the route would operate inbound via Mineral Spring Avenue, right to Woodward Road, right to Veazie Street to Branch Avenue and then continue to downtown Providence via Charles Street. This proposal allowed for inbound service to serve all but one of the Branch Ave bus stops; however, the outbound service would not serve Veazie Street due to a problematic right turn, and would instead turn right on to Woodward Road. This resulted in passengers being forced to walk longer distances than currently required to access the bus. Passengers who would normally alight the bus near Abram Street would instead alight at Woodward Road, a distance of about 815 feet. Passengers who would normally use the Veazie Street stop would use the Douglas Avenue service, a distance of about 1,250 feet.

However, following the public hearings RIPTA staff made a change to this plan that would result in route 58 serving the entirety of Branch Ave between Douglas Ave and Charles St. Instead of operating via Mineral Spring Ave to Woodward St, the bus is now proposed to turn from Mineral Spring Ave to Douglas St. This results in continued service for all passengers on Branch Ave. The proposal also now calls for Saturday service on route 58. The changes to route 58 mean that there will be no service on Mineral Spring Ave between Douglas Ave and Rte #146. This 1.1-mile stretch of road boards an average of 11 passengers per day (by contrast, Branch Ave boards 98 passengers per day). Route 58 will also no longer service Georgiaville Manor, a deviation on the route that only boards one passenger per day. Staff feels that these changes will lead to increased productivity for route 58, which is a route that has been experiencing declining productivity.

The proposed changes aim to minimize impacts while meeting service guidelines and distributing resources throughout the service area as equitably as possible. The proposal reflects the best route design to minimize potential adverse impacts. Concentrating service on

one corridor also allows RIPTA to provide the university and the entire corridor with faster and more direct service to Providence.

RIPTA Staff Recommendation:

It is recommended that the proposed elimination of Route 52, together with the above-described associated service enhancements to Routes 50 and 58, be authorized.



Title VI Review – Service Change

Choose Up: Winter 2017

Description of Service Change:

Route 70: New limited service route connecting URI main campus to new Engineering School.

Major Minor

Location includes:

Minority Population

Low Income Population

Major Service Changes Only:

Adverse Effect? Yes No

Comparison Population: Ridership Census Population

Disparate Impact on Minorities? Yes No

Disproportionate Burden on Low Income Individuals? Yes No

Description of Alternatives Considered:

Substantial Legitimate Justification:

Mitigation Measures:

Attachments: maps tables datasets additional narrative



Title VI Review – Service Change

Choose Up: Fall 2017

Description of Service Change:

Route 62 URI Route 62 is a new route that is a trunked route with route 66, designed to increase service to URI, CCRI and to connect students to the new Nursing Education Center in Providence. It will serve URI, Wickford Junction, CCRI Warwick, Jewelry District, Nursing Education Center, Kennedy Plaza and the Providence Train Station. Between routes 62 and 66, RIPTA will offer 30-minute service all day between URI and Providence Train Station, and 15-minute peak hour service during the URI academic year.

Major Minor

Location includes:

Minority Population
 Low Income Population

Major Service Changes Only:

Adverse Effect? Yes No

Comparison Population: Ridership Census Population

Disparate Impact on Minorities? Yes No

Disproportionate Burden on Low Income Individuals? Yes No

Description of Alternatives Considered:

Substantial Legitimate Justification:

Mitigation Measures:

Attachments: maps tables datasets additional narrative

**RESOLUTION BY THE BOARD OF DIRECTORS OF THE RHODE ISLAND
PUBLIC TRANSIT AUTHORITY**

WHEREAS, the Rhode Island Public Transit Authority (“RIPTA”) is a body corporate and politic created by R.I.G.L. § 28-18, *et seq.* for the purpose of providing statewide public transit services;

WHEREAS, RIPTA operates fixed-route bus service, flexible service, and paratransit throughout the state;

WHEREAS, RIPTA, as the recipient of federal funds from the Federal Transit Administration (the “FTA”), must submit reports, every three years, to the FTA regarding RIPTA’s compliance with Title VI of the Civil Rights Act of 1964 and all FTA regulations relating thereto;

WHEREAS, RIPTA’s 2018-2021 Title VI Program must be submitted to the FTA by April 1, 2018;

WHEREAS, per FTA regulations, RIPTA’s Board of Directors must approve the Title VI Program before it can be submitted to the FTA;

WHEREAS, RIPTA staff has prepared and approved RIPTA’s 2018-2021 Title VI Program, and submitted it for approval by the Board of Directors as an agenda item at the Board’s March 16, 2018 meeting;

WHEREAS, RIPTA’s Board of Directors wishes to approve RIPTA’s 2018-2021 Title VI Program and direct its submission to the FTA;

NOW, THEREFORE, in light of the foregoing, it is hereby RESOLVED by the Board of Directors of the Rhode Island Public Transit Authority to approve submission of RIPTA’s 2018-2021 Title VI Program to the FTA.

On behalf of the Rhode Island Public Transit Authority, the Chairman of the Board of Directors, has executed this Resolution as of the ____ day of March, 2018.

Wayne M. Kezirian, Board Chair



RHODE ISLAND PUBLIC TRANSIT AUTHORITY STAFF SUMMARY FORM

TO: RIPTA **DATE: March 12, 2018**
PREPARED BY: Legal and Planning **DEPARTMENT: Legal and Planning**

TITLE: RIPTA'S 2018 TITLE VI PROGRAM PLAN

BACKGROUND:

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the grounds 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. Because RIPTA receives federal financial assistance from the FTA, we are required to establish and submit a Title VI Program Plan to the FTA every three years. RIPTA's 2018-2021 Plan is due by April 1, 2018. It must be approved by the Board before it can be submitted to the FTA. The full Plan is attached to this staff summary.

In accordance with applicable federal regulations, the Plan sets forth the policies and procedures established by RIPTA to (1) ensure that the quantity and quality of transit service is provided without regard to race, color, national origin, or other protected characteristics; (2) identify and address issues of environmental justice based on income status; (3) promote the full and fair participation of all affected populations in transportation decision making; (4) prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority or low-income populations; and (5) ensure meaningful access to programs and activities by persons with limited English proficiency.

The Plan was prepared by compliance, planning, and public affairs staff, and has been reviewed and approved by Chief Legal Counsel and the Acting CEO.

JUSTIFICATION:

The Title VI Program Plan must be approved by RIPTA's Board of Directors before it may submitted to the FTA as required by law.

FUNDING: NONE

ALTERNATIVES: NONE. FEDERAL LAW REQUIRES ADOPTION OF A TITLE VI PROGRAM.

RECOMMENDATION:

Staff recommends that the board approve RIPTA's 2018-2021 Title VI Program by approving the Resolution attached hereto.

APPROVALS (shaded Departments must approve all Staff Summaries) Projects between \$5,000 and \$10,000 must have Department Director/AGM. Projects between \$10,000 and \$50,000 must have CEO also. Projects greater than \$50,000 must also have Board of Directors Approval

Department	Initial	Date	Department	Initial	Date
Budget/Finance			Maintenance		
Customer Service			Marketing		
Environmental/Safety			Planning		
Flex/Paratransit			Procurement		
Human Resources			Security		
Inform. Services			Training		
Legal/Risk Mgmt	<i>jm</i>	3/14/18	Transportation		
			Chief Exec. Officer	<i>llp</i>	3/15/18

**RESOLUTION BY THE BOARD OF DIRECTORS OF THE RHODE ISLAND
PUBLIC TRANSIT AUTHORITY**

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WHEREAS, RIPTA operates fixed-route bus service, flexible service, and paratransit throughout the state;

WHEREAS, RIPTA, as the recipient of federal funds from the Federal Transit Administration (the "FTA"), must submit reports, every three years, to the FTA regarding RIPTA's compliance with Title VI of the Civil Rights Act of 1964 and all FTA regulations relating thereto;

WHEREAS, RIPTA's 2018-2021 Title VI Program must be submitted to the FTA by April 1, 2018;


WHEREAS, per FTA regulations, RIPTA's Board of Directors must approve the Title VI Program before it can be submitted to the FTA;

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WHEREAS, RIPTA's Board of Directors wishes to approve RIPTA's 2018-2021 Title VI Program and direct its submission to the FTA;

NOW, THEREFORE, in light of the foregoing, it is hereby RESOLVED by the Board of Directors of the Rhode Island Public Transit Authority to approve submission of RIPTA's 2018-2021 Title VI Program to the FTA.

On behalf of the Rhode Island Public Transit Authority, the Chairman of the Board of Directors, has executed this Resolution as of the 19th day of March, 2018.



Wayne M. Kezirian, Board Chair