



RHODE ISLAND PUBLIC TRANSIT AUTHORITY

# Title VI Program 2015-2018

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# RIPTA Title VI Program: 2015-2018

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# CHAPTER ONE

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## INTRODUCTION

This document constitutes the Rhode Island Public Transit Authority's Title VI program, adopted in March 2015 with the approval of Chief Executive Officer Ray Studley and it was approved by the Board of Directors at its April 2015 meeting. It is the first Title VI program prepared in accordance with FTA C 4702.1B, released by the Federal Transit Administration (FTA) on October 1, 2012 .

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 our customers. Discrimination, harassment, or retaliation against our customers is 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.
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, it does not deny the 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.

Allegations received do not have to 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.
- Other agencies or courts where complaint may also be filed and a contact name for each.

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

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 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 and 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 2012 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, as a condition of receiving federal financial assistance, recipients have to 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 speak or understand 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:

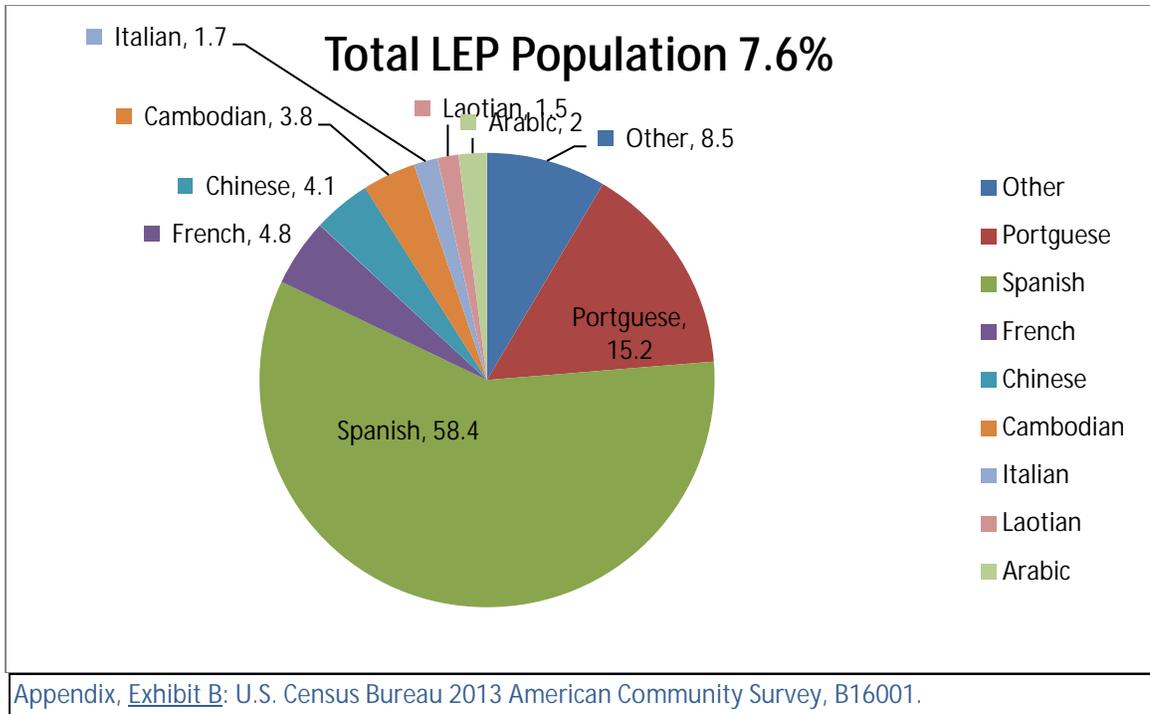
1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a RIPTA program, activity or service.
2. The frequency with which LEP persons come in contact with RIPTA programs, activities or services.
3. The nature and importance of programs, activities or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

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### **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 997,310. We determined the percentage of the State's LEP population by consulting the 2013 American Community Survey by the U.S. Census Bureau (Appendix, [Exhibit B](#)). The survey shows that 76,488 individuals (7.67%) 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.



LEP populations as a percentage of Rhode Island’s total population are as follows: Only Spanish (4.48%), and Portuguese/Portuguese Creole (1.10%) represent more than 1% of Rhode Island’s total population. The next highest language groups were French/French Creole (.037%), Chinese (.031%), Cambodian (.029%), Arabic (.016), Italian (.013%) and Laotian (.011%). 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 inception to February 2015, RIPTA has received 478 calls for an average of 160 calls per year and three calls per week requesting translation in 12 different languages. Spanish was overwhelmingly the most requested language. In 2012, 88.8% of the requests for were for Spanish; 6.3% for Portuguese; and 4.9% for Other. In 2013, Spanish

represented 92.7%, while 7.3 requested Other. In 2014, 94% of requests were for Spanish, and 6.0% were for Other 6.0%. In 2015, Spanish was 100%. "Other" languages included French, Italian, Arabic, Chinese, Cambodian, Laotian, Cambodian, Armenian, Russian, Serbian and Tagalog. (Appendix, Exhibit C)

### Internal RIPTA Survey

In March 2015, 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 554 surveys sent, 130 surveys were completed, for a response rate of about 23%. The surveys were divided among four groups (1) Customer Service staff (12 surveys completed); (2) Administrative, non customer service, staff (18 surveys completed), 3) Fixed Route Drivers (87 surveys completed); and (4) Para Transit Drivers (13 surveys completed). The following are the highlights of the customer service and administrative staff survey results:

- On average, customer service staff assists LEP customers 4.8 times per week, with a range of zero to twenty times per week;
- On average, administrative staff assists LEP customers 2.8 times per week, with a range of zero to thirty 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 Russian were seldom encountered.
- 17% 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.
- 100% of customer service respondents and 17% of administrative respondents reported that they have used translation assistance on the job, which were identified as:
 

Customer Service	Administrative
○ Co-worker – 83%	100%
○ Telephone – 83%	06%
○ Internet – 06%	06%
○ Other services mentioned included "paid interpreter at meetings", and "service."	

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 21.0 times per week, with a range of zero to one hundred times per week.
- In order of frequency, fixed route drivers encounter the following languages:
  1. Spanish
  2. Portuguese
  3. Chinese
  4. Cambodian (Khmer)
  5. French or French Creole
  6. Italian
- Paratransit drivers assist LEP customers an average of 3.1 times per week, with a range of zero to twelve times per week.
- In order of frequency, paratransit drivers encounter the following languages:
  1. Spanish
  2. Portuguese
  3. French or French Creole
  4. Cambodian (Khmer)
  5. Chinese and Italian (the same frequency).
- Other languages mentioned as being encountered, with lesser frequency, was American sign language.

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 21 times per week, fixed-route drivers have the most encounters with LEP individuals. This high rate of contact was expected, given that the majority of RIPTA's routes travel through areas of high LEP populations. Administrative, non-customer service, staff that reported the highest amount of contact with LEP individuals included personnel from Human Resources, Marketing, and Transportation Supervisors.

### **External LEP Survey**

RIPTA provided twelve community organizations<sup>1</sup> 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 six were completed for a response rate of 50%. Following are the highlights of the questionnaire responses:

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<sup>1</sup> 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

- Agencies noted an increase in populations that speak the following languages: Spanish, Arabic, Portuguese or Portuguese Crioulo, French or French Creole, several African languages, Chinese and Polish.
- One agency cited a decrease in populations that speak Cambodian (Khymer).
- 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	50%
2) Flex Service	17%
3) Commuter Resource RI	33%
4) Rack N' Ride	17%
5) Park N' Ride	33%
6) RIPTA's online trip planner	17%
7) Bus Pass Program for Seniors and People with Disabilities	67%
8) Ride Para Transit Service	50%

- Some organizations mentioned specific transit needs of their LEP clients. Comments included:
  - Access to bus passes is becoming more difficult
  - Bus drivers unwillingness to help clients who are not English speaking
  - Free or reduced passes to get to classes
  - Challenging for LEP riders to understand routes and destinations
  - No more coverage by Medicare
  - LEP riders are not accessing all the programs which are available
  - Keeping updated with RIPTA's regular schedule
  - Long trip time, difficulty identifying busses and stops
  - Full busses
- The most commonly cited barriers to the LEP population's use of transit included language, affordability, and availability. One comment which touched on all three barriers was made by the Rhode Island Literacy Initiative: Cost and multiples routes- required to get to some classes (including English classes) and libraries.

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### 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.

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## **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 if they were translated.

## **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 RIPTA’s service area. According to the U.S. Census Bureau, American Community Survey, no LEP language group constitutes more than 5% of RIPTA’s service population, but the following eight languages have more than 1,000 individuals: (1) Spanish (44,699); (2) Portuguese (11,589); (3) French/French Creole (3,699); (4) Chinese (3,126); (5) Cambodian (2,916); (6) Arabic (1,555); (7) Italian (1,272); and (8) Laotian (1,112).

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 eight safe harbor languages on its website ([www.ripta.com](http://www.ripta.com)).

As noted above, translation of non-vital documents is provided, upon request, by Voiance.

## Language Assistance Cards

RIPTA has created Language Assistance Cards that state, in each of the of the eight safe harbor languages, 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](http://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.

- In February or March of each year, 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, on an annual basis, 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 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 is also developing a policy to monitor the language assistance efforts offered by its sub-recipients and contractors. RIPTA will have this policy in place by the end of 2015, and will commence monitoring measures in 2016.

## LEP TRAINING

As of March 2015, 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	385
Ride Bus Operator	112
Flex Operator	23
Supervisor	20
Customer Service	11

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 eight harbor safe, which also provide information how to contact RIPTA customer service. These cards are also available at RIPTA stations and ticket windows.

RIPTA will conduct an annual refresher course in assistance LEP individuals in December,

## 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 eight 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](http://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. 209 .
- RIPTA Customer Support Services are available Monday-Friday 8:30 AM - 4:30 PM.
- Go to [ripta.com](http://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

RIPTA did not undertake construction of facilities meeting the definition provided in Circular 4702.1B, Section III(13), Determination of Site or Location of Facilities.

## PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is a guide for the Rhode Island Public Transit Authority's (RIPTA) 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, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

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 on local buses and/or at local bus stops in English and Spanish.

## ***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 carefully 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 and bus stops. 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, such as postings on store windows. RIPTA has developed and will develop a better relationship with community organizations that serve people of color. RIPTA's Compliance Officer is also the president of the NAACP Providence Branch and he 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 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. If all information cannot be translated, notices could offer translated tags, describing where to obtain translation/interpretations. 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**

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

By the end of August, 2015, translated vital documents in the eight safe harbor languages will be posted to the RIPTA web site.. 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 multilingual brochures in Spanish, and will have them translated in the other seven safe harbor languages by the end of August, 2015.

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 and remind participants that they can contact RIPTA and receive information in their preferred language. 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 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.

## **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**

RIPTA will continue to host discussion groups held with small, targeted groups of participants. 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](http://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

RIPTA makes a concerted effort to involve customers and the general public, including the minority, low-income, and LEP populations within the service area, in the course of conducting public outreach and involvement activities. RIPTA utilizes a variety of approaches to providing communication with interested parties and members of the public and is continually working to improve its outreach.

### **Service Changes**

Any change in RIPTA service — whether it is a delay caused by bad weather or a modification in scheduling — is of importance to the thousands of people who depend on RIPTA. Service changes are made for a variety of reasons, such as construction activity, periodic service-plan reviews, and regular schedule updates. The magnitude of and reasons for the changes determine which of the following methods are used to inform the public of these changes.

#### **Newspaper**

Relevant and timely service information is distributed via press releases to statewide, citywide and community-oriented newspapers, including newspapers geared to minority communities.

#### **Internet**

The RIPTA website ([www.ripta.com](http://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 Chinese, French, Italian, Spanish and Portuguese. The web site also features an interactive Google Trip Planner, allowing transit customers to easily map out their destination. Web site features also include RIPTA service maps and press releases, which are automatically on the RIPTA website.

The RIPTA website is used to disseminate information regarding ongoing RIPTA projects and transit services, including dates and times of public meetings, and hearings; schedules, route maps, and schedule changes; and service advisories and alerts.

The website is also used as a means of soliciting input from interested parties regarding RIPTA services. In 2013 RIPTA posted a survey online so

the community could provide input on the Comprehensive Operational Analysis (COA).

In addition, the website offers customers an avenue for registering complaints and commendations about RIPTA services.

### **E-mail**

Customers can sign up for RIPTA's monthly e-newsletter to have the latest transit news delivered to their desktop. There are currently over 6,929 subscribers. Passengers can now receive e-mail notifications when there is a service change to a specific route, including detour announcements.

### **Public Meetings**

Public meetings are hosted by RIPTA to share information and to solicit input from the public in an informal setting. These meetings are publicized through press releases, mailings, and/or the distribution of informational flyers. Notices of public meetings are also posted on the RIPTA website. Informational materials are disseminated at these meetings.

In addition, the monthly meetings of the RIPTA Board of Directors include a time for public comments. This time provides an open forum for individuals to present their concerns regarding transit operations and policies directly to the General Manager and the Board.

### **Public Hearings**

Public hearings are held to solicit formal comments from the public regarding planned construction projects, the impacts of proposed service changes, and proposed fare changes. Advance notice of public hearings is published in newspapers with a general circulation, as well as newspapers published for specific local communities or neighborhoods.

### **Sandwich Boards, Posters and Flyers**

RIPTA displays posters on vehicles, in stations, and at high-volume bus shelters detailing any service changes that impact customers. RIPTA also distributes flyers directly to individual passengers, businesses, and/or community organizations, when appropriate. Sandwich boards with the

service change information are also used at high-volume bus shelters to inform customers. All sandwich boards, posters and flyers are posted in English and Spanish.

### **Interior Bus Displays**

RIPTA has digital boards on busses to alert passengers of any service changes, detours and community events.

### **Schedules**

RIPTA produces and distributes 1 million schedules annually to ensure that the public has access to route and schedule information for the bus routes operated by RIPTA. RIPTA publishes new timetables three times per year. To assist the public, if a route or schedule has changed since the publication of the previous schedule, the schedule is reprinted and the front panel of the new schedule notes the revision date. Major hubs contain racks where passengers may obtain schedules.

### **Outreach for the new R-Line Rapid Route**

In 2011, RIPTA coordinated planning work with the City of Providence, on the Transportation Corridors to Livable Communities project. This project examined the five highest ridership bus routes in Providence and identified improvements to these corridors. This included Route 11 - Broad St. and Route 99 - North Main St., which ultimately combined to form the R-Line. As part of Transportation Corridors to livable communities, extensive outreach was performed along each corridor, including:

- Bimonthly meetings with stakeholder committees
- RIPTA held three evening meetings in Providence and Pawtucket from April 28 – 30, 2014. The public meetings were held to inform passengers and communities of final R-Line designs and to solicit feedback to make transition to new route as easy as possible
- RIPTA created and maintained a social media presence and e-newsletter for the R-Line's development.
- RIPTA.com was regularly updated with R-Line progress
- Most R-Line buses stops now include bilingual way finding (English and Spanish)
- Public hearing notices were posted approximately 30 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.

- Media release issued to press.
- Digital signage posted in English & Spanish.
- Flyers advertising R-Line (in English and Spanish) distributed to local businesses.
- RIPTA staff distributed new schedules to passengers prior to launch dates.
- Designed, produced and distributed promotion R-Line drawstring nylon bags and pins.

### **Outreach for the Comprehensive Operational Analysis**

In 2012 RIPTA began an in-depth review of all our transit services as part of a Comprehensive Operational Analysis (COA). The study performed a detailed evaluation of the system to identify where people live and work, how each bus route is performing, and where changes might possibly be made to better serve riders. Public outreach included the following:

- Media release issued to press.
- In August and September 2012, RIPTA surveyed nearly 10,000 users of the bus system in order to better understand where people need to travel, and what type of services they desire.
- In February and March 2013, eight evening and one daytime community meeting held in Providence, Narragansett, Newport, Tiverton, Pawtucket, Barrington, Warwick, and Chepachet.
- Passengers notified via social media and e-newsletter.
- Interior bus cards, in both English and Spanish, were printed and installed on all buses.
- RIPTA.com was updated with the COA information.
- Public hearing notices were posted approximately 30 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 May and June 2013, twelve public hearings were held in Barrington, Providence, South Kingstown, Warwick, Newport and Pawtucket, thus covering all five Rhode Island counties.

### **Outreach for Customer Satisfaction Survey**

RIPTA invited customers to take the American Bus Benchmarking Group Customer Satisfaction Survey, available online in English and Spanish, from April 8 through May 5, 2013 and again April 28 through May 25, 2014.

Surveys like these help RIPTA better understand its customers' opinions of existing service and priorities areas that need improvement.

- Interior bus cards, in both English and Spanish, were printed and installed on all buses.
- Digital signage posted in English & Spanish.
- RIPTA.com was updated with the survey information.
- Media release issued to press.
- Passengers and community partners notified via social media and e-newsletter.

### **Outreach for Bus Stop Realignment Project**

In July 2013, RIPTA announced the launch of their Bus Stop Realignment Project which will consolidate bus stops statewide. The intent of this project was to improve passenger experience and route efficiency through more consistent spacing of stops. The removal and realignment of many stops system wide will allow RIPTA to reduce bus stop redundancy, operate more efficiently, reduce conflicts with neighboring properties and parking, and focus investment on the remaining bus stops.

- Media release issued to press.
- Passengers and community partners notified via social media and e-newsletter.
- Digital signage posted in English & Spanish.
- Signage posted in English & Spanish on bus stops alerting passengers. Elected officials were notified of stop removals happening in their community by RIPTA representatives.

### **Outreach for Kennedy Plaza construction**

RIPTA temporarily relocated all bus stops out of Kennedy Plaza on Saturday, July 12, 2014 to accommodate City of Providence renovations of the Plaza. These renovations created a large civic space, reorganized bus berth locations and improved pedestrian connections to and from the plaza.

- Media release issued to press.
- Relocation maps, digital signage and posters were printed and installed or distributed.
- Passengers and community partners notified via social media and e-newsletter.
- Informational outreach teams (including Spanish speakers) distributed information in the Plaza to inform passengers about the changes and how construction would affect their bus service.
- On September 23, 2014, RIPTA held a public meeting in conjunction with the RIPTA Riders Alliance to learn more about the changes happening in Kennedy Plaza.

### **Outreach for Disadvantaged Business Enterprise (DBE) Forum**

On Thursday 24, 2013 and Tuesday, April 14, 2014, RIPTA and the Center to Advance Minority Participation in the Construction Industry, Inc. held two community information and networking forums in South Providence, Rhode Island. RIPTA senior staff including the Chief Executive Officer, Procurement Director and staff, Construction Manager and Compliance Officer met with representatives of the Black and Latino Contractors Association. Both forums were well attended with DBE community representatives. The goals of the Forum:

- Navigating RIPTA's DBE Program
- How to get DBE Certified
- Bidding Requirements/ Concerns
- Post Award Enforcement/ Compliance
- Best Practices

On Tuesday, February 4, 2014, RIPTA hosted a Prime Contractors and Community Contractor and Vendor Networking Forum. The goal of the Forum was to have prime contractors who work regularly on RIPTA Projects meet potential community partners who are DBE. The Forum was hosted as a response from both groups to get to know each other better.

### **Outreach for How to Ride RIPTA Workshop Campaign**

A free *"How to Ride RIPTA Workshop,"* developed by AARP and RIPTA, is designed to empower the senior community to mobilize and remain independent. Following a brief speaking program, RIPTA educates seniors on the basics of using public transportation. RIPTA Spanish-speaking Photo ID staff is on-site to process Senior/Disabled Bus Passes for qualified applicants. *How to Ride RIPTA Workshops* were scheduled on a by request basis at local community and senior centers across the state from 2013 – 2014.

- *"How to Ride RIPTA Guide"* – This step-by-step guide, available in English and Spanish, contains information on how to read a bus schedule, fares, senior discounts and more. All attendees of this travel training program received a free step-by-step *"How to Ride Guide."*
- Informational flyers were printed in English and Spanish and distributed at local community and senior centers prior to program date.
- Presentations are available in Spanish on request.
- RIPTA.com was updated with the workshop information.
- Media release issued to press prior to each workshop.
- Passengers and community partners notified via social media and e-newsletter.

### **Outreach for Tiverton and Little Compton Service**

RIPTA considered options for providing transit service to the Tiverton area and urged the public to provide feedback on how to effectively serve the community. RIPTA hosted an evening community meeting to solicit input on March 18, 2013 at the Tiverton Town Hall. In June 2014, RIPTA introduced Route61X to Tiverton.

- Media release issued to press for community meeting and new service.
- Digital signage and flyers were printed and installed or distributed community meeting and new service.
- Passengers and community partners notified via social media and e-newsletter community meeting and new service.
- Informational outreach teams (including Spanish speakers) distributed information in the area community meeting and new service.

### **Outreach for Wickford Wednesdays**

“Wickford Wednesdays” a promotional campaign to offer commuters a “One Time” free parking and MBTA round trip train fare to Providence (limited to the first 100) every Wednesday at the Wickford Junction garage for the month of January 2013

- Local print media such as the Pendulum, North Kingstown Standard Times, Narragansett Times, and Chariho Times
- Rte. 4 LED RIDOT sign
- News releases and articles in December to direct readers to RIPTA/Commuter Resource RI, RIDOT, Wickford Junction websites
- Web banner on RIPTA.com, and On-line newspapers listed above.  
Advertisements will direct commuters to register on-line for this promotion. The commuter then completes and prints the on-line voucher form for identification and to pre-register for their complimentary MBTA ticket. The commuter is then directed to the Information Office on Wickford Wednesday to redeem the one time offer.
- Commuters' ID is matched against the data base and their parking ticket validated for the day
- Commuters to Providence will receive round trip ticket at that time
- Only commuters to Providence will receive free MBTA round trip ticket
- Free commutes to Providence will be on a “first come first served” basis to the first 100 registrants each Wednesday. Commuters who have not pre-registered and wish to partake in the promotion may do so, only if the available ticket cap has not been reach for that Wickford Wednesday event date
- All verified commuters will receive free parking for the day regardless of where they commute to

# CHAPTER THREE

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## DEMOGRAPHIC DATA & MAPS

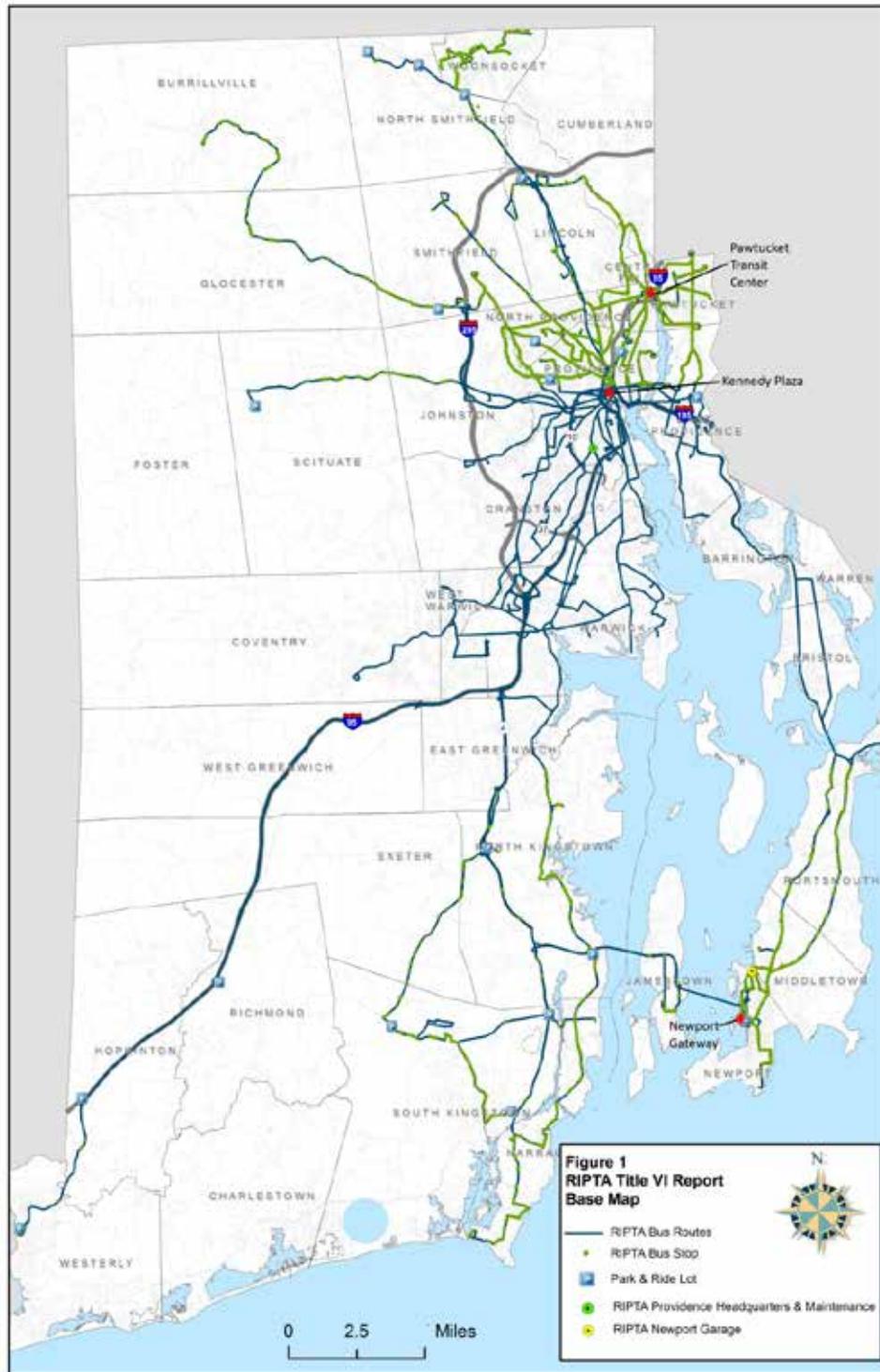
### DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

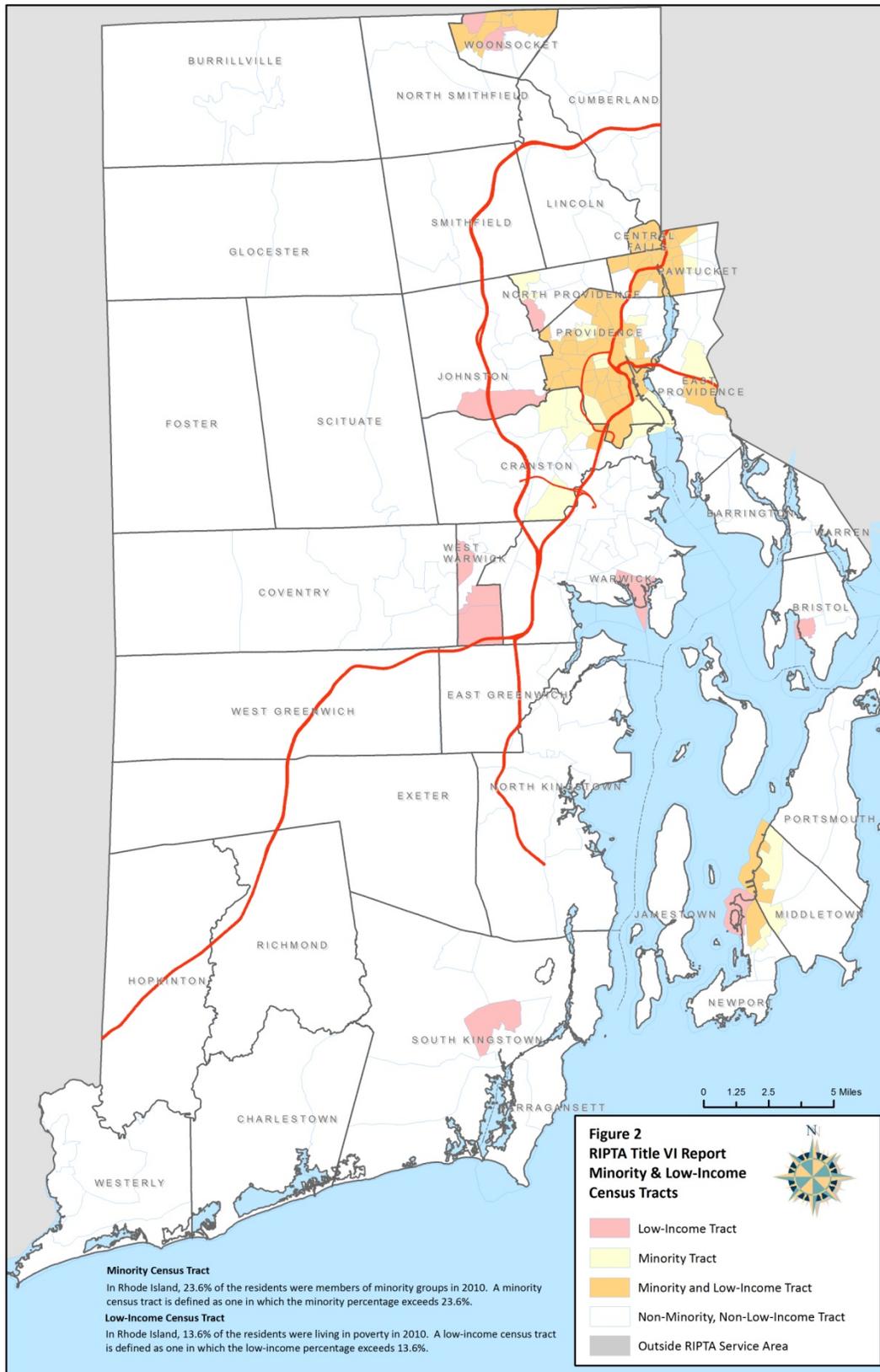
In 2010, the U.S. Census identified 1,052,567 residents in Rhode Island. Rhode Island's minority population includes African Americans, Asians, American Indians and Alaskan Natives, Pacific Islanders, people of Hispanic or Latino origin, other non-white races, and persons of two or more races. In Rhode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

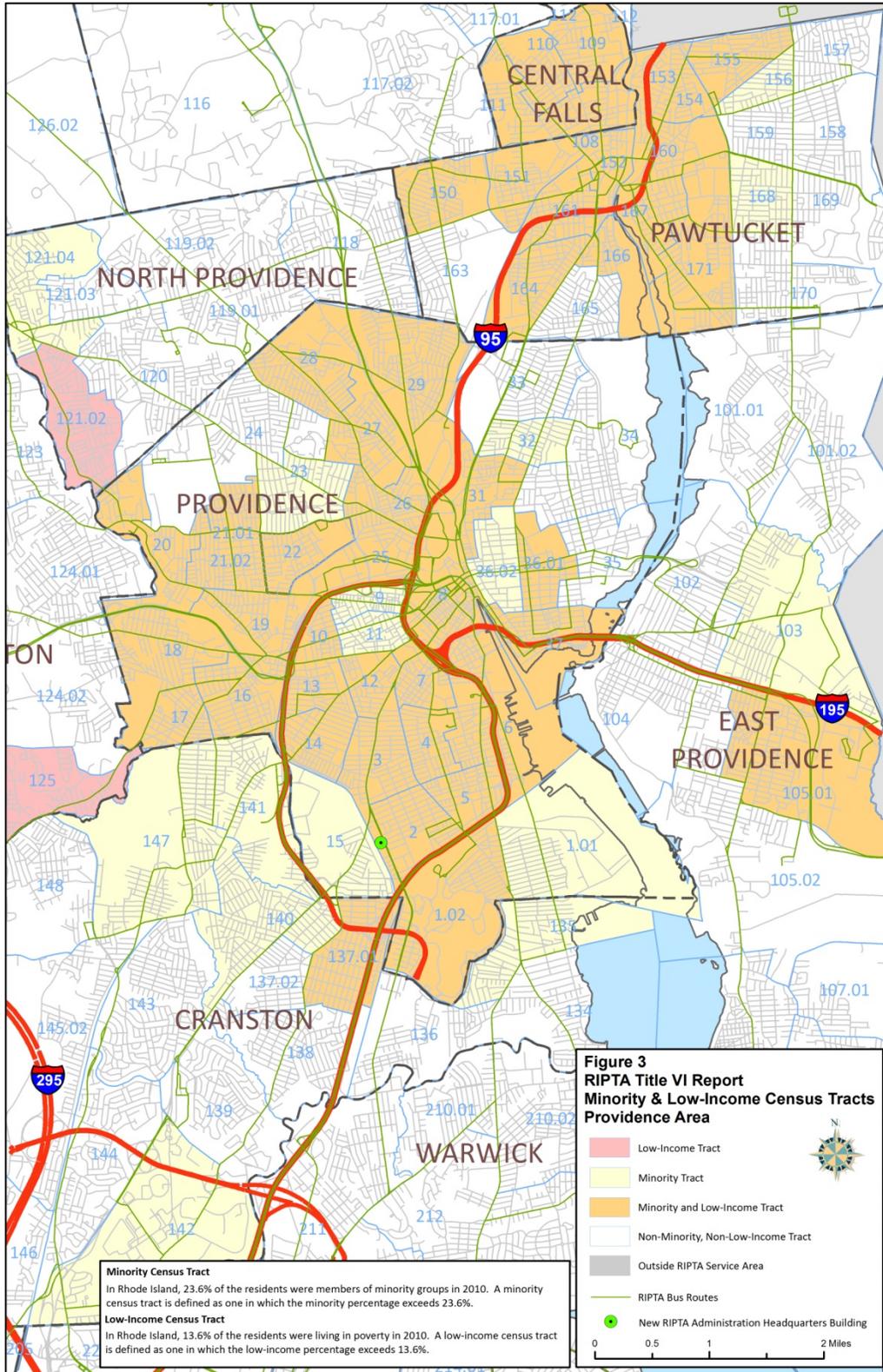
The most recent census data shows that 12.2% of Rhode Island families are living in poverty. Figure 2 illustrates all of the census tracts in the state that have a poverty rate of 12.2% or higher and/or a minority population of 22.5% or higher. Most of the minority and low-income population are concentrated 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 2012, RIPTA conducted our most recent rider survey of approximately 10,000 riders as part of our Comprehensive Operational Analysis (COA) Questions were asked of rider preferences, trip characteristics including fare type, origin and destination and transfer activity as well as rider demographics including household income, rider frequency, age and employment status. Building on the information provided by our initial rider survey, RIPTA plans in the near future to conduct an additional survey to collect information on race, color, national origin, English proficiency, language spoken at home, household income and travel patterns to develop a demographic profile comparing minority riders to non minority riders, Additionally, RIPTA will collect information by fare type amongst minority users and low income users in order to assist with our equity analysis.

## 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 14 members who are all white. To bring more diversity to the ATAC, RIPTA will aggressively recruit 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 has one subrecipient, the Rhode Island Department of Transportation (RIDOT). RIDOT is a direct recipient of FTA funds and submits its own Title VI plan directly to the FTA.

# CHAPTER FOUR

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## SERVICE STANDARDS AND POLICIES

In 2013, RIPTA updated its Service Standards and policies which include vehicle assignment and distribution of amenities.

### SYSTEMWIDE SERVICE STANDARDS

To prevent discriminatory service design or operation, the FTA circular requires transit agencies to adopt systemwide service standards. Systemwide service standards are required 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 4.

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 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.

**TABLE 1 | AVERAGE VEHICLE LOADING MAXIMUMS**

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS	FLEX
<b>Average Maximum Passenger Loading</b> (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
<b>100% of Seating Capacity</b>	55	36	36	28	28	16
<b>120% of Seating Capacity</b>	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
<b>Weekdays</b>							
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
<b>Saturdays</b>							
All Day	15	30	60	60	—	—	n/a
<b>Sundays</b>							
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;
- 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.

**TABLE 4 | MINIMUM SERVICE FREQUENCY GUIDELINES (MINUTES)**

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
<b>Weekdays</b>							
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
<b>Saturdays</b>							
All Day	15	30	60	60	—	—	n/a
<b>Sundays</b>							
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.

## 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

Published timetables must provide the transit patron with a reasonable guarantee that the scheduled service will operate, and will operate on time. The dependability of RIPTA is important to people who typically plan trips around the availability of bus service. Moreover, riders associate a time penalty with unreliable bus service that reduces the attractiveness of public transportation.

There are several ways to measure RIPTA's dependability. The first is whether service operates at all. Measures of actual versus scheduled service are expressed as the percentage of scheduled trips and percentage of scheduled bus pullouts that are actually made. For RIPTA, the missed trip standard is established at 99.5 percent. Therefore, only one trip in 200 can be missed and still meet the standard. Since it is easier to recover from service disruptions at the garage than it is out in the field, an even more stringent standard of 99.8 percent is appropriate for missed pullouts. This permits one missed pull out in 500. RIPTA should have sufficient spare buses and extra board bus drivers to assure that the pullout standard is met.

On-time performance is also examined in terms of schedule adherence, which means the difference between scheduled time and the time the bus actually passes a particular location. The schedule adherence standard consists of two parts: 1) the definition of on time, and 2) the proportion of buses that operate within the on-time range. For purposes of establishing RIPTA on-time performance, "on-time" is established at zero minutes early to 5 minutes late. This allows the bus reasonable latitude for encountering general delays, without unduly inconveniencing the waiting patron. For most persons, a wait of up to five additional minutes would not be regarded as excessive. Buses should never be early, for this would cause patrons to miss the bus entirely and subject many riders to an even longer wait for the next scheduled bus.

The standard for RIPTA schedule adherence is established at 90% during peak service periods and 95% during off-peak hours. Therefore 18 out of 20 peak bus trips and 19 out of 20 off-peak bus trips should be considered "on-time" according to the standard.

## 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

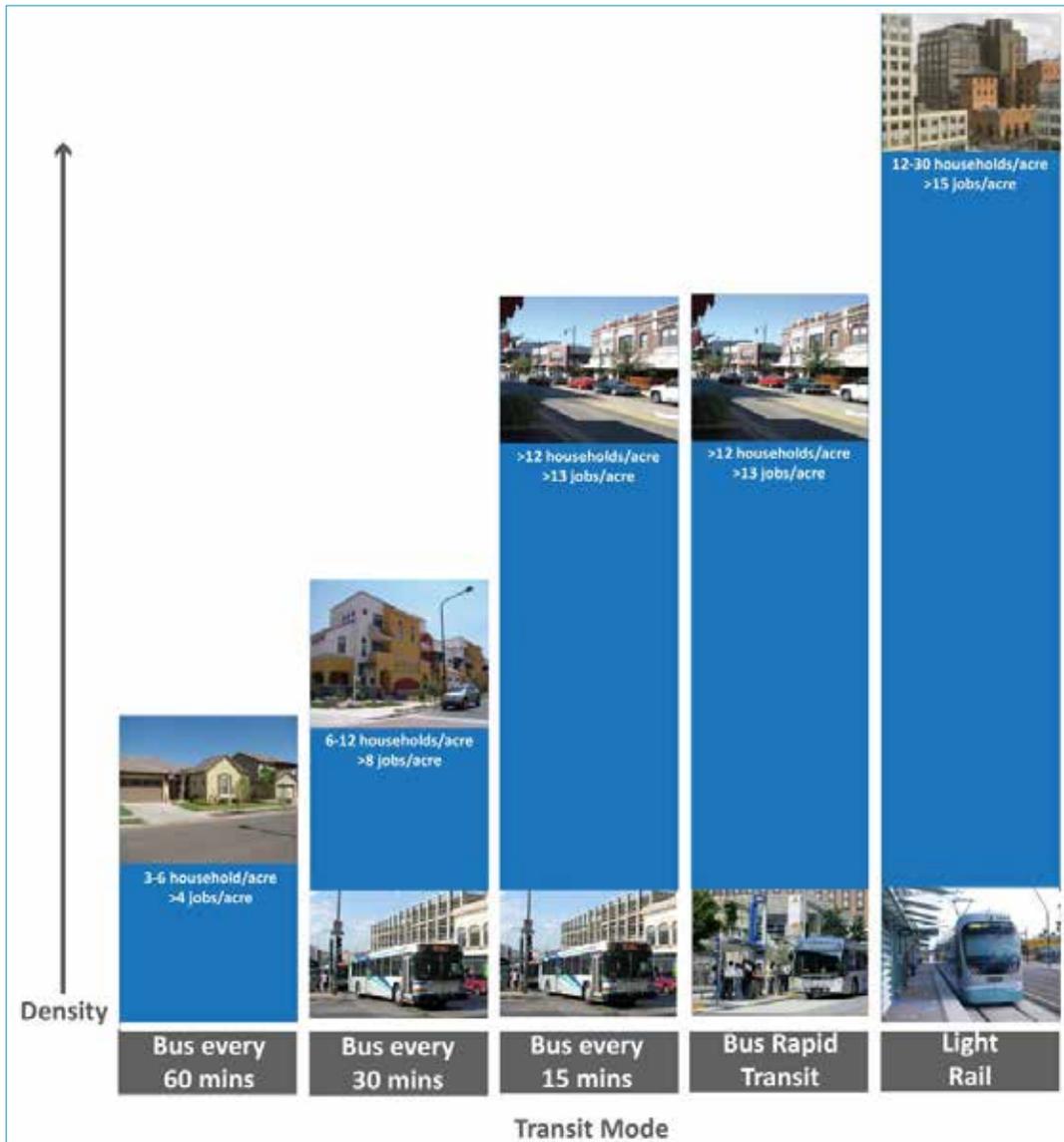
effective and productive in all environments, but RIPTA does strive to provide service in all transit-supportive areas.

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 3 to 6 households per acre or 4 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 dependant 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.

**Production End.** Determination of which residential neighborhoods should be candidates for service is a function of reasonable walking distance. Numerous studies have indicated that the maximum distance an average person can reside from a bus route and still be considered to “have service” is approximately one-quarter mile, which is roughly equivalent to a five-minute walk. However, this rule of thumb must be applied in conjunction with data regarding auto ownership and population density of an area in order to determine the optimum spacing of bus routes. The table below indicates the route coverage standards

suggested for RIPTA based on auto ownership and population density. The former criterion reflects the need for public transportation service while the latter measures the concentration of development necessary to support reasonable utilization levels. The suggested standard would mandate 1,000 feet (about 3/16 of a mile) walking distance between home and closest route in high density and low auto ownership areas. In contrast, for those areas where residential density is relatively low and auto ownership relatively high, walking distance can be as much as one-half of a mile to a route and still meet the standard. These standards apply where the percentage of households without autos and the population density are sufficient to justify such "specified" transit coverage.

In areas that do not exhibit characteristics associated with need or propensity to use transit, the standard permits service to be provided in a "targeted manner" toward specific population concentrations as deemed justified.

The route coverage guide is just that-- a guide. It is not an exact measurement. In some areas, the street pattern is not uniform or major generators are further apart than the guide indicates. RIPTA service may not and should not conform to the guide in all areas. Service should, however, meet the intent of the guide-- areas with more people need more transit service than sparsely populated areas.

**PROPOSED TRANSIT ROUTE COVERAGE GUIDE**  
(Distance to Nearest Bus Route)

PERCENT HOUSEHOLDS <i>WITHOUT AUTOS</i>	POPULATION DENSITY (PERSONS / SQUARE MILE)		
	<i>OVER 5,000</i>	<i>2,000-5,000</i>	<i>UNDER 2,000</i>
Over 20	1,000 Feet	1,300 Feet (1/4 Mile)	2,600 Feet (1/2 Mile)
10 – 20	1,300 Feet	2,600 Feet (1/2 Mile)	*
Under 10	2,600 Feet	*	*

\* Service should only be provided to residential concentrations based on length of route extensions and population.

Another element of this standard relates to the extension of service to outlying areas. For example, some portions of the State may be several miles from the terminal point of the closest RIPTA route. The standard designed below for extension of RIPTA service to outlying areas indicates that the closer the area is to a route terminal point, the smaller the population that would be needed to justify service. For example, an extension of a route requiring a 60 minute cycle time (i.e. time to make a complete round trip) is appropriate for an area that has about 9,600 people. The development of the values contained in the above table are based on 60 minute service and achieving productivity levels, measured in terms of passengers per hours, which are about two-thirds of the RIPTA system average. Past survey experience and professional judgment have led to the estimate that people in outlying areas typically make about two trips each weekday, with one percent of these trips made using public transit. While different values could be applied, the suggested values appear reasonable for a service assessment.

**POPULATION OF OUTLYING AREA**

Cycle Time	
<u>Minutes</u>	<u>Population Served</u>
15	2,400
30	4,800
45	7,200
60	9,600

Besides route extensions, transit operators often make slight route deviations requiring out-of direction (OOD) travel to serve residential neighborhoods or major activity centers. These Out-of-direction route segments may cause inconvenience to riders that are through riders on the route. The decision on whether such deviations should continue and/or be initiated depends on the number of riders served by making the deviation. An OOD factor would be computed as the ratio of through riders to total riders, times the number of minutes required to make the complete deviation. If the OOD factor is 5 or less, the deviation should continue. If the OOD factor is 15 or higher, the deviation should be discontinued. OOD segments with a factor between 5 and 15 exhibit some impact on through ridership and should be reviewed based on other factors (e.g., cost of making the deviation, scheduling

considerations such as frequency, disruptions, ridership types, ease of understanding) to make the service decision.

**Attraction End:** Activity centers deserve transit service if they are large enough to attract an adequate number of transit trips. To assist in this determination, threshold levels have been established for different categories of activity centers. These threshold levels, which are based on past experience and judgment, should serve as guidelines in determining which centers in each category should be given consideration for service. It should also be noted that other factors, such as the proximity of the center to existing routes, should be considered before providing new service to a major activity center.

**Employers.** Employers with 300 or more employees are large enough to warrant consideration for service. This standard applies to both individual employers and groups of employers in a concentrated area (e.g., industrial or office park).

**Hospitals/Nursing Homes.** These usually do not attract a large number of trips. These facilities do, however, often serve those who depend on transit. Therefore, institutions of 100 or more beds may be considered candidates for RIPTA service.

**Colleges/Schools.** Students often comprise a major segment of the transportation dependent population in a community. For this reason, colleges and post-secondary schools have been included in the availability standard. Those institutions with an enrollment of at least 1,000 students warrant consideration for service.

**Shopping Centers.** Shopping trips constitute a major reason for transit travel. Shopping centers with more than 100,000 square feet of leased retail space are large enough to warrant consideration for RIPTA service. Mixed-use retail and office complexes can also be included within this category.

**Social Service/Government Centers.** Public Agencies, government centers and community facilities attract some volume of traffic. While the nature and size of these facilities varies greatly, it can be generally stated that those serving at least 100 clients daily warrant public transit service.

The categories of generators listed above represent the "destination" end of the transit trip. Combined with the availability standards for the other trip end (production), they provide a comprehensive view of service requirements within the State of Rhode Island.

## 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 1. 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 5 | BUS STOP SPACING GUIDELINES

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
<b>Minimum Stop Spacing (feet)</b>							
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
<b>Maximum Stops per Mile</b>							
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 mile*

## SYSTEMWIDE SERVICE POLICIES

The FTA circular requires systemwide 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.

## VEHICLE ASSIGNMENT

Vehicle assignment refers to the process by which vehicles are placed into service in depots and routes throughout the system. The following is quoted directly from RIPTA's "Assignment of Buses" policy.

The following information is a clarification to be used to assist the Night Foreman, Supervisors, and Yardmen in the dispatching of buses.

The fleet is made up of two (2) basic categories: "All Day" buses and "Tripper" buses. "All Day" buses are buses that are deemed most reliable, mechanically, and are not scheduled for EPI (early pull-in). These "All Day" buses are able to operate the full span of service in a day without being fueled. "Tripper" buses are scheduled for EPI because of reliability, fuel, repairs, or PM peak requirement.

Unless a specific bus is required for a run, buses are randomly assigned by the span of service indicated on the pull-out sheet. The "Tripper" buses should be assigned to the runs with the shortest service time, and the "All Day" buses should be assigned to the runs with the longest service time.

### Exceptions to the rule:

- Fulfilling ADA requirements is our primary concern. Always endeavor to issue the best equipment to runs with the highest wheelchair usage. Use daily "Cut Sheets" as a reference.
- Trolleys, indicated on the pull-out sheet by the numeral 9500, have to be assigned to the Providence Link service.
- *Route with difficult turns.* Some routes require smaller buses such as the Terra Transit 26' 2" (9300) and the Nova/RTS 30' (9900). Most of these routes cannot be negotiated safely with a forty foot (40') coach, and are usually indicated on the pull-out sheet.
- *Long Runs.* Given the long distances travelled on some RIPTA services, coupled with vehicle availability constraints and radio communication limitations, when possible, quality controlled buses are assigned to long runs to avoid problems attendant with breakdowns on freeways. A good working knowledge of the fleet is always helpful in assigning these buses. Long runs are usually indicated on the pull-out sheet by the 9800 designation. 9800 is the year the "QC" program began and is the designation used for all quality controlled vehicles.

### DISTRIBUTION OF TRANSIT AMENITIES

The new Title VI circular requires that RIPTA maintain service standards for the distribution of various transit amenities, including bus shelters, benches, timetables, route maps, trash receptacles, and elevators and escalators. Each of these amenities is described below.

**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.

Shelters should include a minimum of 50 square feet of area and be enclosed on all sides except for entrances. Service information including route numbers and schedules that serve the stop should be displayed.

**Benches.** All of RIPTA's shelters, provided by Lamar, have benches. RIPTA does not provide benches at other bus stops

**Timetables and Route Maps.** Timetables are provided at all transit hubs in the RIPTA system. They are also provided at bus stops with the highest concentration of ridership, which is determined through analysis of data received from the Automatic Passenger Counter (APC) system.

**Trash Receptacles.** RIPTA provides trash barrels at all transit hubs.

**Elevators, Escalators.** RIPTA does not have any elevators or escalators located at fixed guideway stations.

# 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 which tend to be relatively small rather than sweeping and bold. In order to protect riders from the incremental eroding 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 like bridges, tunnels, or highways
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, such as: 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:

- a. Span of service reductions of more than one hour total
- b. Frequency reductions of more than fifty percent (50%)
- c. Route segment eliminations that results in a walk of over 1/2-mile to the nearest bus stop from the former stop
- d. Re-routing that results in a walk of over 1/2-mile to the nearest bus stop from the former stop
- e. 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 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 has created a detailed 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. Minority routes (which have potential ridership areas which are over 33.6% minority) include 26 out of 53 fixed routes in RIPTA’s statewide system.

<b>MINORITY ROUTES</b>	
<b>Route</b>	<b>Minority Percent</b>
6	72.9%
18	64.2%
R Line	64.0%
31	63.9%
28	59.6%
20	58.5%
17	58.3%
19	57.5%
72	55.6%
56	54.7%
22	54.3%
27	51.4%
71	51.3%
92	50.2%
73	50.2%
75	49.2%
50	45.9%
1	43.9%

51	43.4%
55	42.2%
76	40.6%
10	40.0%
52	39.8%
80	38.6%
30	37.3%
57	35.7%

In the course of performing a Title VI Equity Analysis, RIPTA will analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the above disparate impact thresholds, RIPTA shall evaluate 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 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.

**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.

If the proposed fare change involves an equal fare increase across all adult fare categories and an equal increase across all fare payment methods, then this fare change would not have a disparate impact requiring further analysis.

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, (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, then 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, then the fare change would be determined to have a disproportionate burden.<sup>1</sup>

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

- (1) Determine the number and percent 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.

<sup>1</sup> Currently, survey data is available for fare media usage by low-income riders only. RIPTA's next major rider survey is budgeted for 2017 and will collect information on minority populations; meanwhile, RIPTA has created a detailed 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. Until more accurate ridership data is available, RIPTA will compare Census data to fare payment collection by route. When RIPTA is employing this methodology, or is uncertain as to which population to use for comparison purposes, it will contact the FTA regional office for technical assistance.

### *Alternatives Analysis:*

Alternative fare payment methods or fare media available for people 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 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 datasets were initially identified by RIPTA technical staff, then thoroughly vetted through a public process that included a formal public comment period and a community meeting (Community Leadership Workshop) with members of the affected populations. RIPTA worked with and received input from representatives of organizations representing the gamut of Title VI protected communities including

African American, Latino, Cape Verdean, Portuguese, and refugee and newly-arrived immigrant communities.

Because of the complexity of these SAFE policies and procedures, RIPTA developed a comprehensive agenda for its Community Leadership Workshop to meaningfully engage key organizational representatives in the policy development and approval process. 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 policies should be modified in any way, and (5) seek general comment and input regarding RIPTA's equity program.

The workshop was attended by minority, low-income, and LEP contacts from throughout RIPTA's service area. A number of questions were addressed including how organizations representing minority and low-income populations could be engaged in the ongoing review of SAFE analyses so as to better understand impacts. RIPTA 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 process.

## SERVICE AND FARE CHANGE EQUITY ANALYSES

See Appendix, Exhibit F.

# 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 systemwide 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 systemwide service standards and policies. A minority transit route is one in which at least one-third of the revenue miles are located in a Census block where the percentage minority population exceeds the percentage minority population in the service area. 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 December 2012.

**Table 6-1. Selected Routes for Service Monitoring**

Route	Minority/Non-Minority	Route Type
3 Warwick Avenue	Non-Minority Route	Urban Radial
R-Line	Minority Route	Rapid
19 Plainfield / Westminster	Minority Route	Urban Radial
20 Elmwood Avenue	Minority Route	Key Corridor
31 Cranston Street	Minority Route	Key Corridor
54 Lincoln / Woonsocket	Non-Minority Route	Regional
65X Wakefield Express	Non-Minority Route	Express
67 Bellevue Avenue / Mansions	Non-Minority Route	Suburban & Crosstown
72 Weeden St / Central Falls	Minority Route	Urban Radial
92 Federal Hill / East Side	Minority Route	Urban Radial

## 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 eight (80%) of the service provided to non-minority routes..

## VEHICLE LOAD

Below is an excerpt from the Vehicle Loading section of RIPTA’s Service Guidelines:

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
<b>Average Maximum Passenger Loading (as a percentage of seating capacity)</b>							
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
3 Warwick Ave	Non-Minority	47.18%	39.51%
R-Line	Minority	81.92%	74.18%
19 Plainfield / Westminster	Minority	62.26%	45.00%
20 Elmwood Ave	Minority	57.18%	54.44%
31 Cranston St	Minority	62.36%	51.92%
54 Lincoln / Woonsocket	Non-Minority	59.85%	53.44%
65X Wakefield Express	Non-Minority	56.05%	-
67 Bellevue Ave / Mansions	Non-Minority	44.78%	61.47%
72 Weeden St / Central Falls	Minority	63.03%	54.03%
92 Federal Hill / East Side	Minority	88.28%	66.50%

## VEHICLE HEADWAY

Below is an excerpt from the Minimum Service Frequencies section of RIPTA's Service Guidelines describing the frequency guidelines.

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
<b>Weekdays</b>							
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
<b>Saturdays</b>							
All Day	15	30	60	60	—	—	n/a
<b>Sundays</b>							
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		
3 Warwick Ave	20	35	45	50	50
R-Line	10	10	20	15	15
19 Plainfield / Westminster	30	30	70	50	70
20 Elmwood Ave	15	15	30	45	45
31 Cranston St	14	14	25	25	25
54 Lincoln / Woonsocket	30	30	60	45	60
65X Wakefield Express	5 Trips	-	-	-	-
67 Bellevue Ave / Mansions	20	20	20	20	20
72 Weeden St / Central Falls	30	30	40	45	45
92 Federal Hill / East Side	20	20	20	30	30

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." The Comprehensive Operational Analysis (COA), completed in the summer of 2013, recommended 60 minute frequency on route 19 weekday evenings and 60 minutes on Saturdays and Sundays, which would comply with the Service Guidelines. However, due to resource constraints and ridership trends, RIPTA has not added the additional vehicles necessary to meet the guideline. For route 20, the COA recommended that based on ridership trends for both Saturday and Sunday, the route should operate at a 45 minute headway, which RIPTA has complied with. 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 defines 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
3 Warwick Ave	66.8%
R-Line	68.9%
19 Plainfield / Westminster	56.1%
20 Elmwood Ave	60.6%
31 Cranston St	60.3%
54 Lincoln / Woonsocket	62.1%
65X Wakefield Express	61.5%
67 Bellevue Ave / Mansions	56.1%
72 Weeden St / Central Falls	65.7%
92 Federal Hill / East Side	59.0%

As shown in the table above, none of RIPTA's routes currently meet the on-time performance standard. RIPTA is aware of the on-time performance problem and is currently developing an On-Time Performance Committee, which will be a working

group 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 will be an ongoing process, beginning in the spring of 2015.

## DISTRIBUTION OF TRANSIT AMENITIES

The Service Guidelines, which were adopted by the RIPTA Board in December 2012, were developed to replace the old outdated guidelines. The new guidelines did not include a section on the distribution of transit amenities because of the expectation that this topic would be handled separately. RIPTA, in cooperation with the Rhode Island Department of Transportation (RIDOT), is currently developing a Request for Proposals to create a "RIPTA/RIDOT Joint Transit/Highway Design Guidebook" and will include guidance regarding the following topics:

- bus stop placement and spacing
- bus stop dimensions
- bus stop signage and pavement markings
- passenger amenities placement
- thresholds for levels of investment
- parking impacts
- pedestrian and cyclist impacts
- use of curb extensions
- transit signal prioritization accommodations
- bus lanes
- parking restrictions
- interactions with other forms of transit,
- roadway signage, and
- curb extensions

RIPTA expects that the new guidebook will be completed in 2015, ensuring that future service monitoring studies will include an analysis of transit amenities.

## VEHICLE ASSIGNMENT

RIPTA's new Service Guidelines do not contain a section pertaining to vehicle assignment and RIPTA is currently developing such a policy. Historically, vehicle assignment has been the responsibility of the Transportation Department. However, effective in June 2015 this responsibility is being moved to the Planning and Scheduling

Department, where the new vehicle assignment policy is being developed. The new policy will be designed to ensure that the age and quality of vehicles assigned to routes will not be determined on the basis of race, color, or national origin. 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.

## SERVICE AVAILABILITY

Below is an excerpt from the Service Coverage section of RIPTA's Service Guidelines:

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.

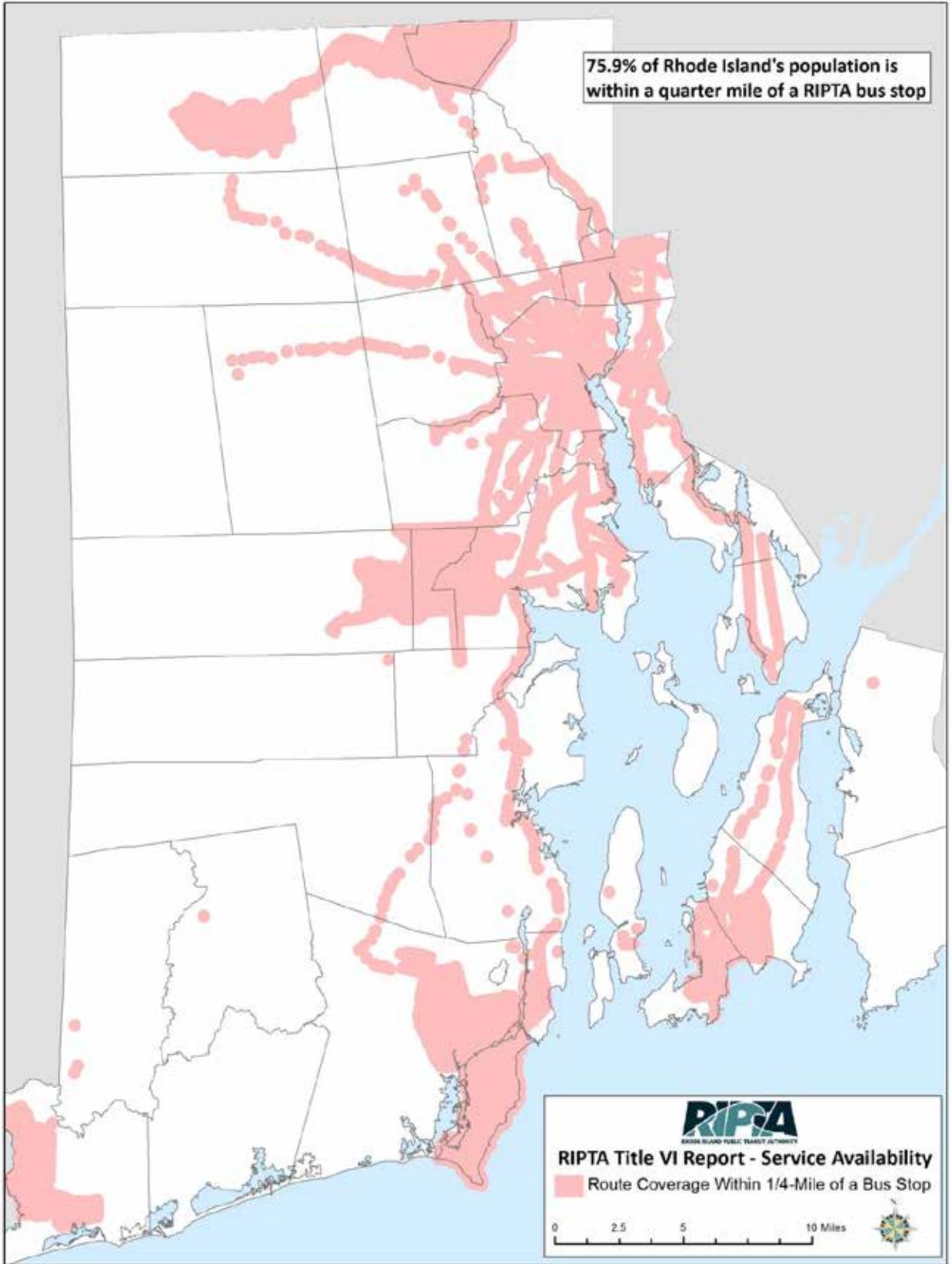
Population and employment densities are one of the strongest indicators of potential transit demand. Once densities begin to exceed 3 to 6 households per acre or 4 jobs per acre, fixed route bus services may be viable. More densely developed areas may warrant higher levels of transit service.

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 dependant 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.

The intent of the service coverage guide is that areas with more people 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](http://www.RIPTA.com)





## 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.

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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 excluidas 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.

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Rellene del dorso de formulario

**RIPTA Título VI Formulario de Queja**

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



**Table 1. LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR POPULATION 5 YEARS AND OVER**

	Rhode Island	
	Estimate	Margin of Error
Total:	997,310	+/-734
Speak only English	784,798	+/-5,676
Spanish or Spanish Creole:	116,255	+/-2,646
Speak English "very well"	71,556	+/-3,504
Speak English less than "very well"	44,699	+/-3,282
French (incl. Patois, Cajun):	8,588	+/-1,397
Speak English "very well"	7,087	+/-1,130
Speak English less than "very well"	1,501	+/-585
French Creole:	6,897	+/-2,111
Speak English "very well"	4,699	+/-1,405
Speak English less than "very well"	2,198	+/-968
Italian:	5,593	+/-1,328
Speak English "very well"	4,321	+/-1,277
Speak English less than "very well"	1,272	+/-655
Portuguese or Portuguese Creole:	30,279	+/-4,405
Speak English "very well"	18,690	+/-3,144
Speak English less than "very well"	11,589	+/-2,568
German:	1,567	+/-788
Speak English "very well"	1,418	+/-743
Speak English less than "very well"	149	+/-148
Yiddish:	14	+/-28
Speak English "very well"	14	+/-28
Speak English less than "very well"	0	+/-210
Other West Germanic languages:	148	+/-188
Speak English "very well"	90	+/-158
Speak English less than "very well"	58	+/-96
Scandinavian languages:	558	+/-528
Speak English "very well"	523	+/-522
Speak English less than "very well"	35	+/-70
Greek:	1,984	+/-1,124
Speak English "very well"	1,805	+/-1,013
Speak English less than "very well"	179	+/-200
Russian:	1,646	+/-724
Speak English "very well"	909	+/-482
Speak English less than "very well"	737	+/-531
Polish:	1,914	+/-901
Speak English "very well"	1,452	+/-799
Speak English less than "very well"	462	+/-280
Serbo-Croatian:	78	+/-116
Speak English "very well"	5	+/-10
Speak English less than "very well"	73	+/-121
Other Slavic languages:	663	+/-497
Speak English "very well"	507	+/-420
Speak English less than "very well"	156	+/-199

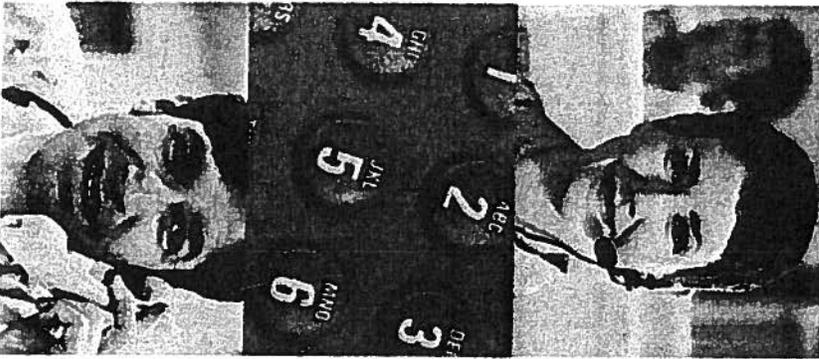
**Table 1. (cont.) LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR POPULATION 5 YEARS AND OVER**

	Rhode Island	
	Estimate	Margin of Error
Armenian:	1,153	+/-868
Speak English "very well"	1,049	+/-842
Speak English less than "very well"	104	+/-119
Persian:	280	+/-286
Speak English "very well"	280	+/-286
Speak English less than "very well"	0	+/-210
Gujarati:	337	+/-551
Speak English "very well"	337	+/-551
Speak English less than "very well"	0	+/-210
Hindi:	1,276	+/-818
Speak English "very well"	1,276	+/-818
Speak English less than "very well"	0	+/-210
Urdu:	394	+/-338
Speak English "very well"	240	+/-236
Speak English less than "very well"	154	+/-214
Other Indic languages:	1,781	+/-1,048
Speak English "very well"	1,306	+/-704
Speak English less than "very well"	475	+/-469
Other Indo-European languages:	1,293	+/-683
Speak English "very well"	1,160	+/-586
Speak English less than "very well"	133	+/-168
Chinese:	6,753	+/-1,778
Speak English "very well"	3,627	+/-1,060
Speak English less than "very well"	3,126	+/-1,267
Japanese:	803	+/-407
Speak English "very well"	527	+/-349
Speak English less than "very well"	276	+/-262
Korean:	798	+/-616
Speak English "very well"	663	+/-514
Speak English less than "very well"	135	+/-154
Mon-Khmer, Cambodian:	5,572	+/-2,099
Speak English "very well"	2,658	+/-992
Speak English less than "very well"	2,916	+/-1,308
Hmong:	625	+/-778
Speak English "very well"	267	+/-294
Speak English less than "very well"	358	+/-492
Thai:	141	+/-178
Speak English "very well"	90	+/-158
Speak English less than "very well"	51	+/-84
Laotian:	2,796	+/-1,452
Speak English "very well"	1,684	+/-924
Speak English less than "very well"	1,112	+/-720
Vietnamese:	1,197	+/-779
Speak English "very well"	635	+/-439
Speak English less than "very well"	562	+/-441
Other Asian languages:	2,275	+/-1,500
Speak English "very well"	1,365	+/-830
Speak English less than "very well"	910	+/-853

**Table 1. (cont.) LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR POPULATION 5 YEARS AND OVER**

	Rhode Island	
	Estimate	Margin of Error
Tagalog:	1,172	+/-816
Speak English "very well"	591	+/-443
Speak English less than "very well"	581	+/-463
Other Pacific Island languages:	18	+/-31
Speak English "very well"	15	+/-30
Speak English less than "very well"	3	+/-7
Navajo:	0	+/-210
Speak English "very well"	0	+/-210
Speak English less than "very well"	0	+/-210
Other Native North American languages:	176	+/-225
Speak English "very well"	176	+/-225
Speak English less than "very well"	0	+/-210
Hungarian:	172	+/-282
Speak English "very well"	172	+/-282
Speak English less than "very well"	0	+/-210
Arabic:	3,350	+/-1,538
Speak English "very well"	1,795	+/-840
Speak English less than "very well"	1,555	+/-1,229
Hebrew:	374	+/-263
Speak English "very well"	374	+/-263
Speak English less than "very well"	0	+/-210
African languages:	3,003	+/-971
Speak English "very well"	2,238	+/-778
Speak English less than "very well"	765	+/-618
Other and unspecified languages:	589	+/-344
Speak English "very well"	425	+/-338
Speak English less than "very well"	164	+/-199

Source: U.S. Census Bureau, 2013 American Community Survey



**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](mailto:info@voiance.com)  
Web: [www.voiance.com](http://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.

<b>Albanian</b> Shqip	A flisni shqip? Ne do të telefonojmë një përkthyes.	<b>Italian</b> Italiano	Parlate italiano? Chiameremo un interprete.
<b>Arabic</b> العربية	هل تتكلم اللغة العربية ؟ سوف نتصل تلفونيا بالمترجم .	<b>Japanese</b> 日本語	日本語を話しますか。 通訳をお呼びいたします。
<b>Bengali</b> বাংলা	আপনি কি বাংলা বলতে পারেন? আমরা একজন সোচ্চারিত সফে টেলিফোনে যোগাযোগ করব	<b>Korean</b> 한국어	한국어 통역이 필요하십니까? 통역사를 전화로 연결해 드리겠습니다.
<b>Bosnian</b> Bosanski	Govorite li Bosanski? Nazvaćemo prevodioca.	<b>Laotian</b> ພາສາລາວ	ທ່ານປາກົດສາລາວຫລືບໍ່? ພວກເຮົາຈະໃຫ້ທ່ານ ເມັດອອກການປາກົດສາລາວໃຫ້.
<b>Cambodian</b> ខ្មែរ	អើ្នកនាំយកភាសាខ្មែរ ឬទេ? ព្រះបាទនឹងទូរស័ព្ទស្វែងរកអ្នកបកប្រែ	<b>Mandarin</b> 普通话	您讲普通话吗? 我们将打电话为您找一位翻译来。
<b>Cantonese</b> 广东	您講廣東話嗎? 我們將打電話為您找一位翻譯來。	<b>Polish</b> Polski	Czy mówi Pan/Pani po polsku? Zadzwonimy po tłumacza.
<b>Chinese</b> 中文	您讲中文吗? 我们将打电话去找一位翻译。	<b>Portuguese</b> Português	Você fala português? Contactaremos um intérprete.
<b>Farsi</b> فارسی	آیا شما فارسی صحبت میکنید? ما میخواهیم به یک مترجم تلفن کنیم.	<b>Punjabi</b> ਪੰਜਾਬੀ	کیا آپ پنجابی بولتے ہیں؟ ہم کے ترجمان تلفن کریں گے۔
<b>French</b> Français	Parlez-vous français? Nous contacterons un interprète.	<b>Russian</b> Русский	Вы говорите по-русски? Мы позвоним переводчику.
<b>French Creole</b> Kreyòl Fransè	Èske ou pale Fransè Kreyòl? Nap rele yon entèprèt nan telefòn pou ede w.	<b>Somali</b> Soomaali	Af Soomaaliga ma ku hadashaa? Waxaan telefoon u dirii doonnaa turjumaan.
<b>German</b> Deutsch	Sprechen Sie Deutsch? Wir rufen einen Dolmetscher an.	<b>Spanish</b> Español	¿Habla español? Vamos a llamar a un intérprete.
<b>Greek</b> Ελληνικά	Μιλάτε Ελληνικά; Θα τηλεφωνήσουμε σε διερμηνέα.	<b>Turkish</b> Türkçe	Türkçe biliyor musunuz? Biliyorsanız bir tercüman bulacağız.
<b>Haitian Creole</b> Kreyòl Ayisyen	Èske ou pale Kreyòl? Nap rele yon entèprèt nan telefòn pou ede w.	<b>Ukrainian</b> Українська	Ви розмовляєте українською мовою? Ми зателефонуємо перекладачу.
<b>Hindi</b> हिन्दी	क्या आप हिन्दी बोलते हैं ? हम एक दुभाषिये को फोन कर देंगे ।	<b>Urdu</b> اردو	کیا آپ اردو بولتے ہیں؟ ہم کے ترجمان تلفن کریں گے۔
<b>Hmong</b> Hmoob	Koj puas hais lus Hmoob? Peb mam li hu ib tug neeg txhais lus rau koj.	<b>Vietnamese</b> Tiếng Việt	Ông/bà nói tiếng Việt phai 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 Esperanto	059 Italian	045 Mien	134 Slovenian
120 Aklan	077 Estonian	235 Javanese	373 Mirpur	142 Somali
070 Albanian	275 Ethiopian	357 Javanese Creole (Patols)	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 Fanti	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 Kanjobat	381 Dega/Mon-Khmer	053 Swedish
109 Azerbaijani	052 Finnish	289 Kannada	293 Moroccan Arabic	377 Sylheti
343 Bahasa/Brunei	227 Flemish	369 Karen	248 Nahuatl	108 Tadjhik
019 Bambara	228 Fon	238 Karenni/Kayah	144 Navajo	302 Taichew
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	303 Telegu
225 Belorussian	217 French Creole	239 Kikuyu	250 Pidgin	359 Temne
324 Bemba	278 Frisian	366 Kinya/Rwanda	250 Nipponese	047 Thai
084 Bengali	032 Fukinese	240 Kirghiz	054 Norwegian	105 Tibetan
269 Berber	014 Fulani	338 Kirundi	294 Nuer (Sudan)	028 Tigrigna (Eritrea)
085 Bhojpuri	229 Fuzhou	376 Kongo	251 Oromo (Ethiopia)	307 Tohono O'Odham
118 Bicol	230 Ga	041 Korean	386 Ouatchi	305 Toisan
382 Borana	231 Gaddang	320 Krahn	296 Paluan	036 Toishanese
263 Bosnian	232 Gaelic	241 Krio	116 Pampango	128 Tongan
270 Brazil-Portuguese	228 Gallinya	364 Kru/Krumen	114 Pangasnian	334 Triqui
069 Bulgarian	281 Gana	370 Kunama	252 Pao-An	342 Trukese/Chuukese
042 Burmese	282 Ganda (Uganda)	140 Kurdish	253 Papiamento	259 Tshiluba
325 Cakchiquel	388 Gari	372 Kurmanji	110 Pashto (Afghanistan)	112 Turkish
048 Cambodian	216 Georgian	353 Lahu	297 Persian	095 Twi
031 Cantonese	057 German	143 Lakota	254 Pidgin English	076 Ukrainian
013 Cape Verdean	322 Grebo	367 Lanvhou	331 Pohnpeian	0/9 Urdu
132 Catalan	071 Greek	403 Lao	062 Polish	336 Uzbek
122 Cebuano	125 Guamanian	204 Latvian	073 Polynesian	049 Vietnamese
138 Chaldean	350 Guarani	024 Lingala	061 Portuguese	214 Visayan
038 Chao Chow	083 Gujarati	075 Lithuanian	141 Portuguese Creole	117 Waray-Waray
226 Chavacano	284 Gwa	313 Loma	358 Pothohari	020 Wolof
344 Cherokee	129 Haitian Creole	242 Luganda	080 Punjabi	061 Wu
025 Chichewa	039 Hakka	329 Luo	332 Purepecha/Tarasco	360 Xhosa
030 Chinese	022 Hausa	243 Luxembourgcois	145 Quechua	361 Yapese
378 Chinese	285 Hawaii Creole	315 Maay Somali	317 Quiche	387 Yemeni Arabic
346 Chui Chow	106 Hebrew	068 Macedonian	260 Quxinese	135 Yiddish
034 Chungshan	082 Hindi	087 Magahi	298 Romani	021 Yoruba
316 Chuukese	351 Hindko	086 Maithili	061 Romanian	362 Yucateco
348 Creek	319 Hindustani	244 Malagasy	078 Russian	262 Yugoslavian
347 Creek	046 Hmong	051 Malay	126 Samoan	146 Yupik
341 Croulo	286 Hokkien	088 Malayalam	337 Sarahuleh/Soninke	115 Zambal
067 Croat an	310 Hopi	354 Malinke	255 Senegalese	380 Zande
063 Czech	233 Hubel	245 Maltese	148 Serbian	029 Zapoteco
271 Dakota	352 Huizhou	318 Mam	299 Serbo-Croatian	335 Zarma
055 Danish	147 Hunanese	035 Mandarin	037 Shanghainese	309 Zulu
111 Dari (Afghanistan)	065 Hungarian	015 Mandingo	333 Sichuan/Szechuan	
131 Dinka (Sudan)	234 Ibanag	246 Mandinka	256 Sicilian	
056 Dutch	218 Ibo	247 Mankon	257 Sindi	
272 Ebon	133 Icelandic	205 Marathai		
	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
<b>Arabic</b>	Arjoo alintithar	Lahtha min fadlek
<b>Armenian</b>	Khntroom enk spasel	Mi rope
<b>Chinese</b>	Qǐng bié guà jī	Qǐng nín shāo děng
<b>Farsi</b>	Lotfan gooshee	Yek Lahzeh lotfan
<b>French</b>	Vuyeh pahsyontay	Uhng momeng sil voo play
<b>German</b>	Bit-tuh lay-gen zee niht owf	Bit-tuh hah-ben zee einen moment ge-dood
<b>Italian</b>	Attay nday ray pray-goh	Uhn moh may ntoh pray-goh
<b>Japanese</b>	Omachiqudasai	Sukoshi omachiqudasai
<b>Khmer</b>	Sōm cham bonték	Sōm cham mūy plait
<b>Korean</b>	Jam kkan man yo	Jam si man yo
<b>Mandarin</b>	Qǐng bié guà jī	Qǐng nín shāo děng
<b>Portuguese</b>	Por fahvorh, ahguahrdee	Oong momentu por fahvorh
<b>Russian</b>	Po-zha-lui-sta po-do-zhdi-te	Ad-nu mi-nut-ku
<b>Spanish</b>	Ace-pay-rae poor-fah-vohr	Oon moe-main-toe poor-fah-vohr
<b>Vietnamese</b>	Sin zu may	Doi mot Lat

## Language Usage

RUN TIME: 3/11/2015 1:27:47 PM  
RUN BY: Diana Woodruff

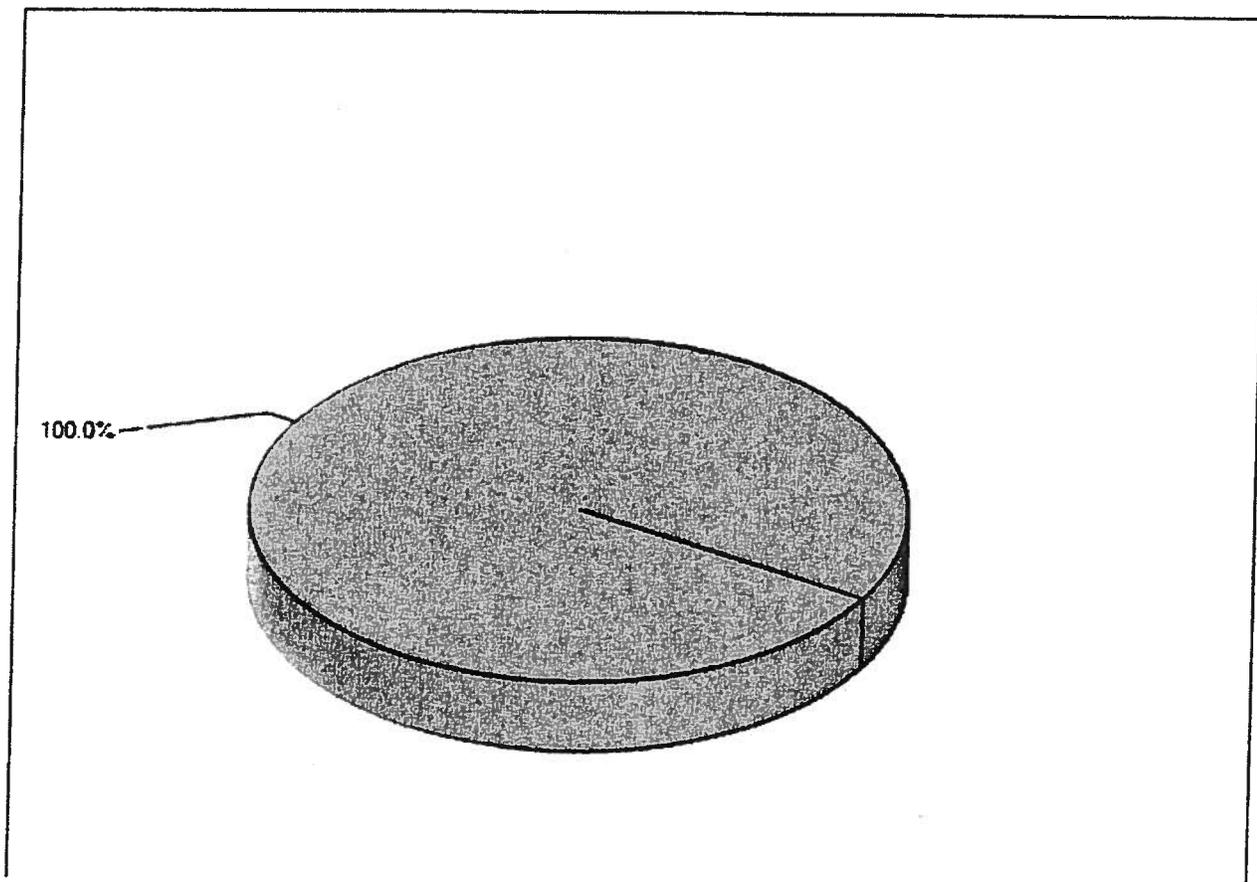


START DATE: 1/1/2015  
END DATE: 2/28/2015  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071

PERCENT OF MINUTES BY LANGUAGE  
Top 10 Languages



## Language Usage

RUN TIME: 3/11/2015 1:27:47 PM  
RUN BY: Diana Woodruff



START DATE: 1/1/2015  
END DATE: 2/28/2015  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071

 Spanish - 100.0%

# Language Usage

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RUN BY: Diana Woodruff

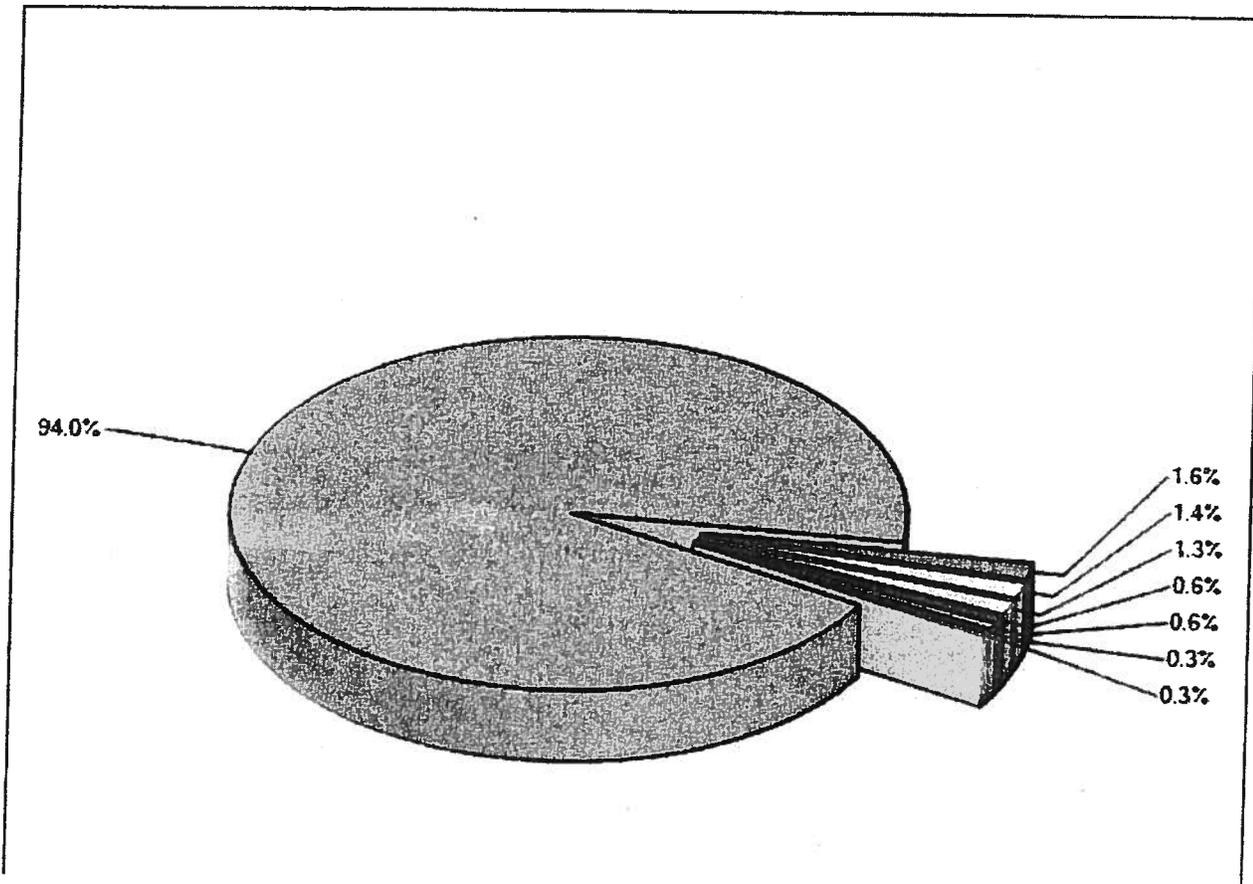


START DATE: 1/1/2014  
END DATE: 12/31/2014  
TIME ZONE: Eastern Time -5:00 GMT  
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LANGUAGES IN CHART:

ACCOUNT(S): 501014071

PERCENT OF MINUTES BY LANGUAGE  
Top 10 Languages



## Language Usage

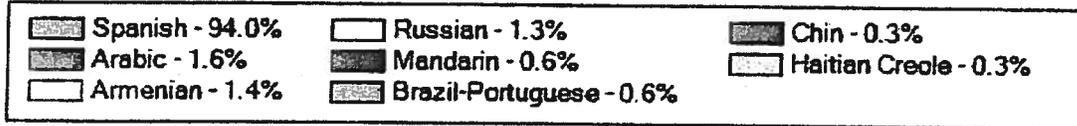
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RUN BY: Diana Woodruff



START DATE: 1/1/2014  
END DATE: 12/31/2014  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071



# Language Usage



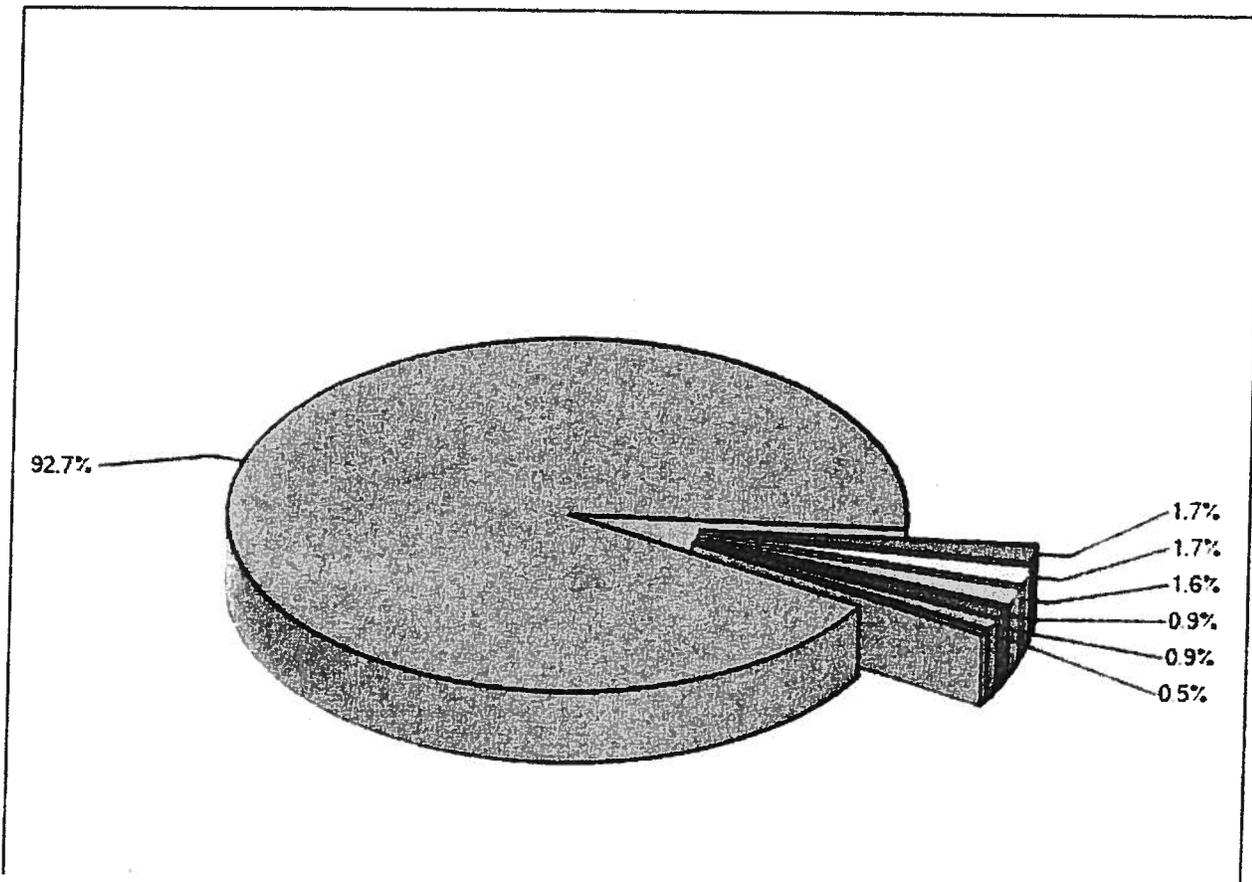
RUN TIME: 3/11/2015 1:25:36 PM  
RUN BY: Diana Woodruff

START DATE: 1/1/2013  
END DATE: 12/31/2013  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071

PERCENT OF MINUTES BY LANGUAGE  
Top 10 Languages



## Language Usage

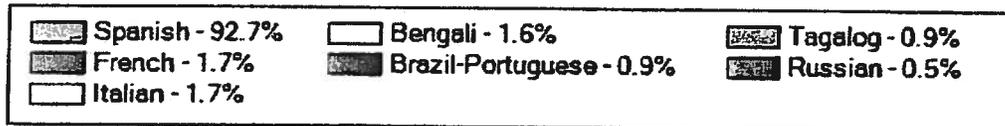


RUN TIME: 3/11/2015 1:25:36 PM  
RUN BY: Diana Woodruff

START DATE: 1/1/2013  
END DATE: 12/31/2013  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071



# Language Usage

RUN TIME: 3/11/2015 1:23:13 PM  
RUN BY: Diana Woodruff

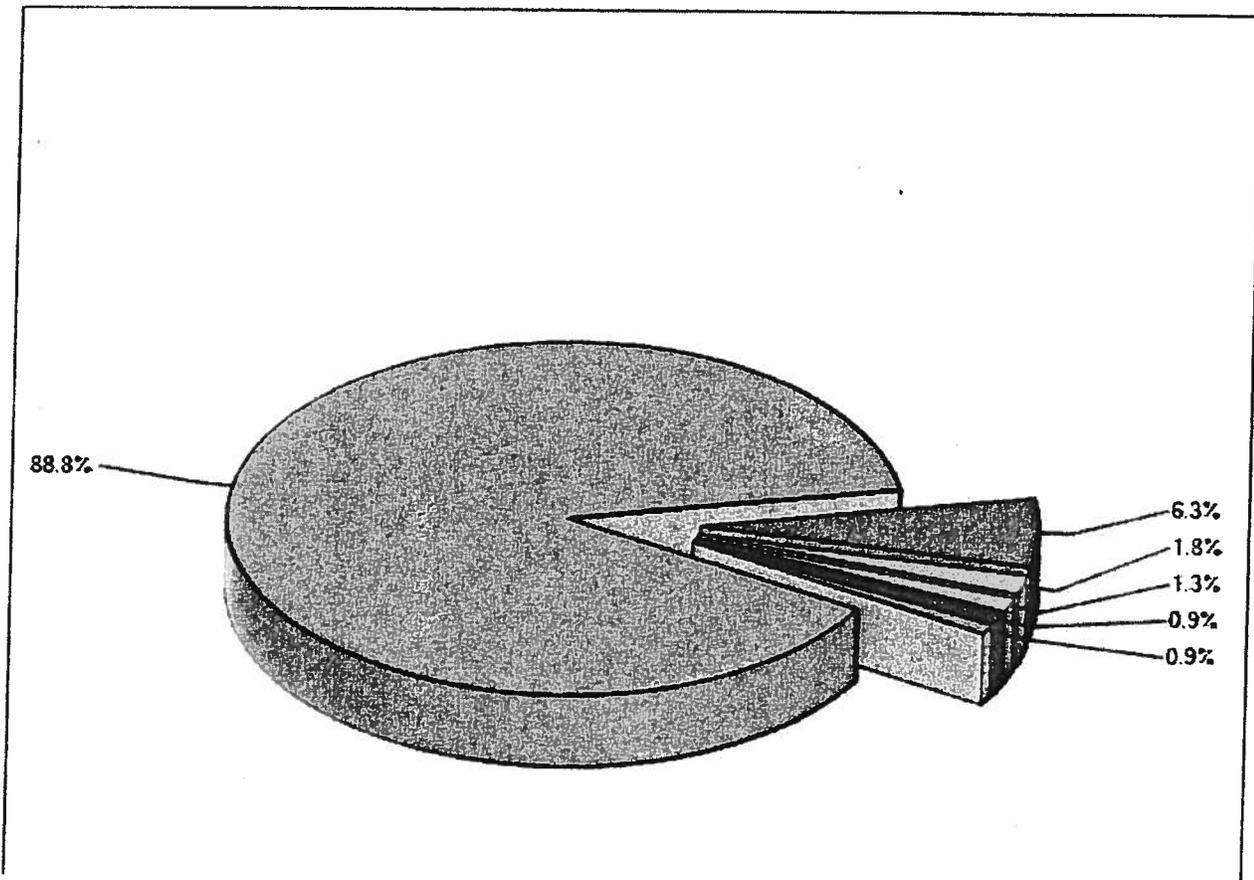


START DATE: 1/1/2012  
END DATE: 12/31/2012  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071

PERCENT OF MINUTES BY LANGUAGE  
Top 10 Languages



# Language Usage

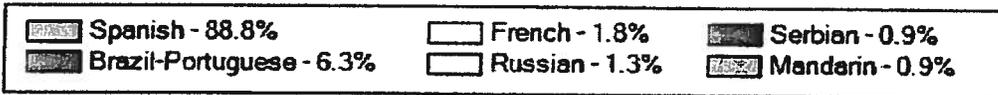
RUN TIME: 3/11/2015 1:23:13 PM  
RUN BY: Diana Woodruff



START DATE: 1/1/2012  
END DATE: 12/31/2012  
TIME ZONE: Eastern Time -5:00 GMT  
10

LANGUAGES IN CHART:

ACCOUNT(S): 501014071





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 alintitha	Lahna min fadlek
Armenian	Khntroom enk spasel	Mi rope
Chinese	Qing bie gua	Qing nin shao deng
Farsi	Lotfan gooshee	Yek Lahzeh lotfan
French	Vuyen pansyontay	Ung momang silvo play
German	Bit-tuh lay-gen zee niht owf	Bit-tuh hah-ben zee einen moment ge-doold
Italian	Attay nday ray pray-goh	Uhnimoh may nto pray-go
Japanese	Omachiqudasai	Sukoshi omachiqudasai
Khmer	Som cham bontek	Som cham mdy pla
Korean	Jam kkan man yo	Jam si man yo
Mandarin	Qing bie gua	Qing nin shao deng
Portuguese	Por fahvorh, ahguahrdee	Oong momentu por fahvorh
Russian	Po zha-lu-sia po-do-zhi-te	Ad-nu mi-nul ku
Spanish	Ace-pay-rae poor-fah-vohr	Oon moe-main-toe poor-fah-vohr
Vietnamese	Sin zu may	Doi mot Lat

Exhibit D

 <b>IF YOU WOULD LIKE TO RECEIVE ASSISTANCE IN YOUR LANGUAGE, PLEASE CALL RIPTA CUSTOMER SERVICE AT 401-784-9500, EXTENSION 104.</b>	
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), សូមហៅមកលេខសេវាអតិថិជនតាមលេខ លេខ 401-784-9500, លេខបន្ត 104។
Italian 	Se desideri ricevere assistenza in italiano, contatta gentilmente il nostro servizio di Assistenza Clienti al numero 401-784-9500, int. 104.
Laotian 	ຖ້າທ່ານຢາກໄດ້ ການຊ່ວຍເຫຼືອ ອັນ ພາສາລາວ, ກະລຸນາ ນາໂທຫາພາກສ່ວນບໍລິການລູກຄ້າ ທີ່ 401-784-9500, ຕໍາລະ 104.
Arabic 	إذا كنت ترغب في الحصول على المساعدة في (اللغة العربية)، يرجى الاتصال بخدمة العملاء على 401-784-9500، دخلي 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.

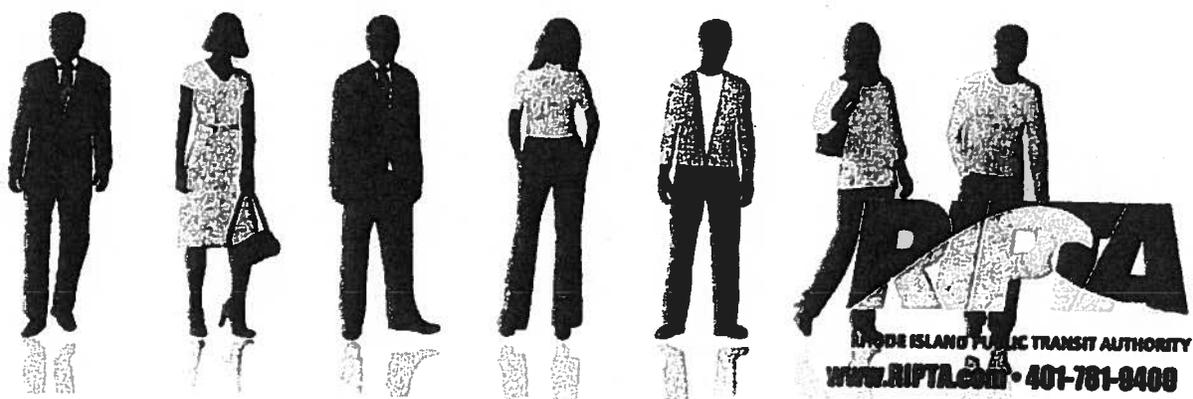
### What Should You Do if You Have A Complaint?

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.

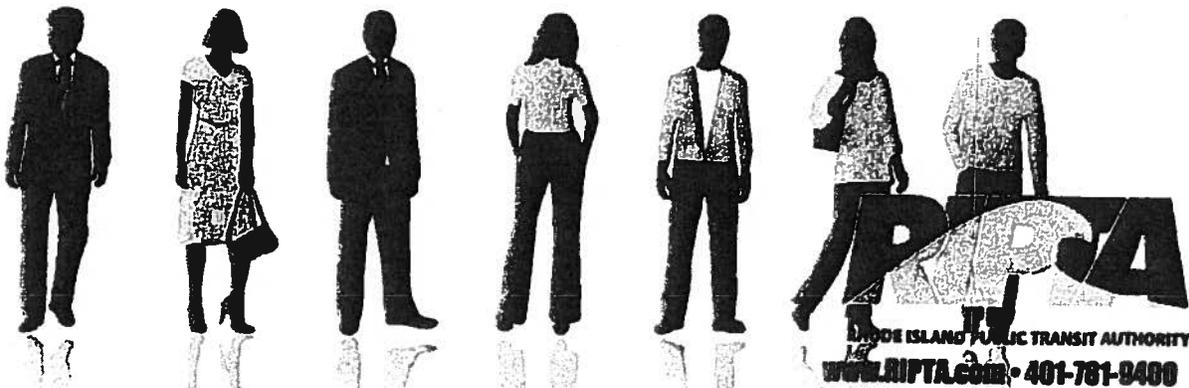
### ¿Qué debo hacer si tengo una queja?

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.



# 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 carrera, 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 atende 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 Significa el Título VI Para Usted?** 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 carrera, 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 capaces también tiene una política de la mano dura que prohíbe ninguna forma de discriminación ilegal.

**What Should You Do If You Have Complaints?** 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: • 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 Debo Hacer Si Tengo Quejas?** 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 someterse una queja, incluye por favor su información de contacto así como detalles del incidente inclusive lo que ocurrieron, dónde y cuándo, y los nombres, las direcciones, los números de teléfono y envíen por correo electrónico las direcciones de testigos. Puede: • Enviar una carta a: El Director del Servicio de atención al cliente RIPTA, 705 Providence de la Avenida de Elmwood, RI 02907 • Llame La Oficina de Servicio al Cliente de RIPTA (401) 781-9400. La Oficina está disponible de lunes-viernes 7:00P.M. - 7:00A.M. • Va al RIPTA.com y descarga una copia del Título VI Queja Forma para llenar y enviar a la dirección antes mencionada.

**RIPTA Maintains 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 Mantiene Su Sugerencia** 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, querríamos oír de usted.



781-9400 • RIPTA.COM

## SERVICE & FARE CHANGE EQUITY ANALYSES, JUNE 2012 – DECEMBER 2015

Pursuant to the September 24, 2015 Voluntary Compliance Agreement between RIPTA and FTA, RIPTA must provide the following to FTA:

- A list of major service or fare changes since the last Title VI Program submission.
- Copies of all SAFE analyses, conducted in accordance with the appropriate Circular guidance.
- Explanation of new service to South Attleboro and associated SAFE analysis, if required.

The following information addresses these three items.

### Major Service Changes

RIPTA has implemented a total of 31 major service changes since the adoption of its previous Title VI Program in June 2012. Below is a list of the major service changes implemented since adoption of RIPTA's prior Title VI Program.

#### RIPTA Major Service Changes

Choose Up	Minority Route	Low Income Route
Summer 2012 (No major service changes)		
Fall 2012 (No major service changes)		
Winter 2013 (No major service changes)		
Summer 2013 (No major service changes)		
Fall 2013 (Effective August 24)		
13 Coventry	No	No
21 Reservoir	No	No
26 Atwells	No	Yes
30 Arlington	Yes	No
31 Cranston	Yes	Yes
32 East Providence	No	No
34 East Providence	No	Yes
49 Camp Street	No	Yes
53 Smithfield	No	No
55 Admiral	Yes	Yes
76 Central Avenue	Yes	Yes
92 Rhode Island College	Yes	Yes
Winter 2014 (Effective January 18)		
12X Arctic	No	No
19 Plainfield	Yes	Yes
51 Charles Street	Yes	Yes
59X N. Smithfield	No	No
72 Weeden	Yes	Yes
79 Columbus Avenue	No	No
90C Chimney Hill	No	No
95X Westerly Express	No	No

Summer 2014 (Effective June 21)		
13 Arctic	No	No
17 Dyer / Pocasset	Yes	No
35 Rumford	No	No
61X Tiverton	No	No
98 Pawtucket Avenue	No	No
Fall 2014 (No major service changes)		
Winter 2015 (Effective January 17)		
21 Reservoir	No	No
62 Oxbow	No	No
66 URI / Galilee	No	No
Spring 2015 (Effective March 21)		
76 Central Avenue	Yes	Yes
80 Armistice Boulevard	Yes	Yes
Summer 2015 (Effective June 20)		
62 Oxbow	No	No
Fall 2015 (No major service changes)		
Winter 2016 (No major service changes)		

## Fare Change

In Spring 2015, RIPTA launched a fare study, at the conclusion of which RIPTA proposed a fare change for public comment and consideration by the RIPTA Board of Directors. At their December 2015 meeting, having reviewed and considered a Fare Change Equity Analysis and extensive public comment, the RIPTA board voted to move forward with the proposed fare changes.

Highlights of RIPTA's fare proposal include:

- For full fare riders, the cost of transfers with cash will initially increase to \$1.00. Transfers with cash will be eliminated in phase 2.
- Riptiks and the 15-Ride pass will be eliminated and replaced with a 10-Ride ticket for \$20 in phase 1. In phase 2, the 10-Ride ticket will be replaced with a stored value smartcard that charges \$2.00 for one trip, including free transfers.
- 7-Day passes will increase in price from \$23.00 to \$25.00 in phase 1.
- Monthly passes will increase in price from \$62.00 to \$70.00 in phase 1 and be converted to rolling passes in phase 2 (valid for a period of 30 or 31 days from first use).
- Low income seniors and individuals with disabilities, whom RIPTA was previously prohibited by state law from charging a fare, will now pay one-quarter of the full adult fare or \$0.50 for an initial boarding and \$0.25 for a transfer.
- Phase 2 may also include new fare products for reduced fare riders.
- Following public hearings and consideration by the Board, Phase 1 has been modified from the original proposal to reduce the cash fares for low income seniors and individuals with disabilities. Phase 1 is currently in the process of being implemented. Phase 2 is proposed to be implemented after upgrades to RIPTA's fare collection technology. Since the implementation date of Phase 2 is unknown, this analysis focuses solely on Phase 1. A Title VI Fare Change Equity Analysis of the modified changes is included at the end of this Exhibit.

## Major Service Change and Fare Change SAFE Analyses

Included at the end of this Exhibit are RIPTA's SAFE Analysis Worksheets for the 31 major service changes implemented since the adoption of its previous Title VI Program, as well as the Fare Change Equity Analysis for the above-referenced fare change to be implemented this year.

### South Attleboro Service

Effective June 21, 2014, RIPTA initiated service to South Attleboro, Massachusetts via Routes 1 and 35. Extension of the 1 line, as reflected in the attached SAFE Analysis Worksheet and in accordance with RIPTA's Service and Fare Change Policies, was a minor service change. The change consolidated the 1 Eddy, 42 Hope Street, and 77 Benefit/Broadway into a single route, with service redesigned to operate between South Attleboro Train Station and T.F. Green Airport. Service operates every 20 minutes between downtown Pawtucket and Shaw's Post Road, Warwick, with every other trip extending to either South Attleboro Station in the northbound direction or T.F. Green Airport in the southbound direction. This redesigned route brought enhanced multimodal mobility to all riders along this route, including minority and low income populations along the former 1 Eddy route. Extension of the 35 Rumford / Newport Avenue line was a major service change, providing an overall service increase with selected route segment eliminations. The route formerly operated between the Stop & Shop on Cottage Street in Pawtucket to Kennedy Plaza in downtown Providence. For most of its alignment, Route 35 runs along Newport Avenue, Wilson Avenue, and Broadway, and uses the Henderson Bridge and East Side Tunnel to access downtown Providence. Although the route was relatively straight-forward, it had low productivity. The terminus was changed to the South Attleboro MBTA station with a resulting increase in ridership. Service to the prior terminus at the Cottage Street Stop & Shop was replaced by a deviation to route 76.



## Title VI Review – Service Change

Choose Up: Fall 2013

### Description of Service Change: Route 13 Coventry

Weekday & Saturday - Service has been redesigned to operate between Woodland Manor in Coventry and the Warwick Mall Transit Hub. Passengers traveling to Providence may transfer to the 21, 22 or 30 Lines at Warwick Mall. Passengers boarding along Reservoir Avenue will now use the 21 Reservoir / Garden City Line. Service will operate every 45 minutes peak and every 90 minutes off peak on weekdays and Saturdays. In order to ease connections, the 21 Line will operate every 20 minutes on weekdays and every 35 minutes on Saturdays.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

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### 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:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:** The new terminus of the route was selected for its robust array of transfer opportunities.



## Title VI Review – Service Change

Choose Up: Fall 2013

### Description of Service Change: Route 21 Reservoir

7 Days - Service has been redesigned as a 'key corridor' route and will operate express via Rte. #10 between downtown Providence, Kennedy Plaza and Reservoir Ave. then continue to Garden City, Pastore, Warwick Malls and CCRI, Warwick. Service will operate every 20 minutes all day on weekdays and every 30 minutes at night. Service will operate every 35 minutes on Saturday and every 45 minutes on Sunday. Trips will now depart from Stop 'C' in Kennedy Plaza.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    Service increase

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

### Description of Service Change: Route 26 Atwells

The 26 Line will be discontinued and replaced with service extended to RI College via Atwells Ave. - Mt. Pleasant Ave. on the 92 Line. Route 92 service has been redesigned, extending the line to RI College via Atwells Ave. - Mt. Pleasant Ave. Service will operate every 20 minutes all day on weekday and every 30 minutes on Saturday & Sunday. Service will no longer enter the Price Rite Lot.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    Route elimination/consolidation

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:**



## Title VI Review – Service Change

Choose Up: Fall 2013

### Description of Service Change: Route 30 Arlington

7 Days - Service has been redesigned and will no longer operate into Huntington Industrial Park or via Gansett/Park. Service will now terminate at Warwick Mall. Passengers wishing to travel to RI Mall or CCRI-Warwick may now use the 21 and 22 Lines.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

### *Major Service Changes Only:*

Adverse Effect?     Yes     No    Hours/miles reduction below threshold

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 31 Cranston

7 Days - Service will no longer operate through-city to 56 Chalkstone. Service has been rescheduled and will operate every 14 minutes all day and every 25 minutes at night on weekday. On weekends, service will operate every 25 minutes all day.

Major    Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?    Yes    No   Increase in service hours.

Comparison Population:    Ridership    Census Population

Disparate Impact on Minorities?    Yes    No

Disproportionate Burden on Low Income Individuals?    Yes    No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

Mitigation Measures: As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 32 East Providence/Wampanoag

7 Days - Service has been redesigned to operate via I-195 to Warren Avenue (R) South Broadway (L) Martin (R) Pawtucket Ave. (L) Wampanoag Trail (R) Tripps Lane to Citizens Bank Operations Center. Service will be every 60 minutes throughout the day.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Route segment elimination.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 34

7 Days - Service has been redesigned to operate via Taunton Ave. instead of Warren Ave. Service has also been rescheduled to operate every 60 minutes all day on weekdays, and weekends. Passengers along Warren Ave. or traveling to Tripps Lane may use the 32 Line.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Does not meet thresholds.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 49 Camp Street

Service will now operate at the following times: Inbound from Miriam Hospital at 9:10am, 3:10am & 3:56pm. Outbound from Providence, Kennedy Plaza at 8:45am & 3:31pm. For more service passengers may use the 99 Line along North Main St. operating every 10-11 minutes or the 42 Line on Hope St. operating every 20 minutes.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service reduction.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 53 Smithfield Avenue

The 53 Line has been discontinued. Passengers may use the 72 Weeden / Central Falls Line for service along Silver Spring St., Smithfield Ave. and Power Rd.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Route eliminated.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:    Nearby/partially overlapping Route 72 service frequency was increased.



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 55 Admiral /Providence College

7 Days - Service has been rescheduled to operate every 30 minutes all day and every 40 minutes at night on weekdays, every 30 minutes on Saturday and every 60 minutes on Sunday. Trips will now terminate at Fatima Hospital. Passengers traveling to or from RI College may now use the 92 Line operating every 20 minutes on weekday and every 30 minutes on Saturday and Sunday.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Does not meet thresholds.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification: As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Fall 2013

### Description of Service Change:

**76 Central Avenue:** Weekday & Saturday - Service has been rescheduled to operate every 60 minutes all day. Service on Sunday has been discontinued. This route was interlined with routes 71 and 80 to provide crosstown one-seat ride connections. The change resulted in more than a 25% decrease in service hours.

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: Eliminating the route.

### Substantial Legitimate Justification:

Ridership was low and more comparable to ridership on nearby route 80, making 20 minute frequency an excessive investment in a non-performing route.

### Mitigation Measures:

Rather than eliminate, RIPTA decided to reduce the frequency in an attempt to increase the overall performance of the route.



## Title VI Review – Service Change

Choose Up: Fall 2013

Description of Service Change: Route 92 Rhode Island College/Federal Hill/East Side

Service has been redesigned, extending the line to RI College via Atwells Ave. - Mt. Pleasant Ave. Service will operate every 20 minutes all day on weekday and every 30 minutes on Saturday & Sunday. Service will no longer enter the Price Rite Lot.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase/route extension.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2014

### Description of Service Change: Route 12X

Weekday: Formerly Route 90A, these trips will now originate in Arctic Center and operate Inbound via Main St. to Centreville Road (Rte. #117) servicing Rte. 117 Park-n-Ride Lot and then continue to Providence via I-95 North. Outbound: via I-95 South to Rte. #117 servicing the P-n-R Lot, then via Tollgate Rd.- Providence St. - Main St. terminating at Arctic Center. A 8:25am Inbound trip and a 5:35pm outbound trip have been added.

Major     Minor

Location includes:

- Minority Population  
 Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    Does not meet thresholds.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2014

### Description of Service Change: Route 19 Plainfield

Service has been rescheduled with all trips operating via Westminster through Olneyville Square to Pocasset, then via Plainfield terminating at WalMart Cranston. Weekday: Every 30 minutes all day / Every 70 minutes at night. Saturday: Every 50 minutes throughout the day. Sunday/Holiday: 60 minutes throughout the day. Service to Atwood Ave. has been discontinued.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

### *Major Service Changes Only:*

Adverse Effect?     Yes     No    Route segment eliminations.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** The route segments eliminated were not located in minority or low-income areas; service in these areas was enhanced. As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2014

**Description of Service Change: Route 51 Charles Street/Twin River/CCRI**  
Service has been rescheduled and realigned to operate via Charles - Rte. #246 servicing Twin River and CCRI Lincoln. Service will no longer operate via Mineral Spring to Pawtucket. Passengers traveling between Charles St. and Pawtucket may transfer to Rte. #73 Mineral Spring/Twin River/CCRI at Mineral Spring & Charles St. Weekday: Every 30 minutes all day / Every 60 minutes at night. Saturday and Sunday/Holiday: Every 60 minutes all day.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

**Description of Alternatives Considered:**

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:**



## Title VI Review – Service Change

Choose Up: Winter 2014

### Description of Service Change: Route 59X North Smithfield

A New Park-n-Ride has been established at Slatersville Plaza in North Smithfield. The route will operate along North Main St. the Village Green and School St. in Slatersville, then via Rte. #146A servicing Branch Village and Park Square. An additional Park-n-Ride Lot will be available on Great Rd. opposite Branch Village. The route will continue to Rte. #146 servicing Lincoln Mall and then operate Express to downtown Providence.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    New route.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2014

Description of Service Change: Route 72 Weeden / Central Falls

Weekday: Service has been rescheduled to operate more frequently at every 30 minutes peak and every 45 minutes off peak. Saturday, Sunday & Holidays will operate every 90 minutes.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2014

Description of Service Change: Route 79 Columbus Avenue

The 79 Columbus Line has been discontinued. Passengers may utilize the 80 Armistice Blvd. Line for service to Memorial Hospital and Columbus Avenue.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

### *Major Service Changes Only:*

Adverse Effect?     Yes     No    Route eliminated.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:** All but approximately ½ mile are served by other routes – Route 80 and 35.



## Title VI Review – Service Change

Choose Up: Winter 2014

Description of Service Change: Route 90C Chimney Hill

The 90C Line from Chimney Hill Apartments has been discontinued. Passengers in the Cumberland area may now use 59X from Lincoln Mall.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

### *Major Service Changes Only:*

Adverse Effect?     Yes     No    Route eliminated.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

### Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures: Replaced by new Route 59X.



## Title VI Review – Service Change

Choose Up: Winter 2014

Description of Service Change: Route 95X Westerly Express

Weekday: Morning trips will continue through-city from Kennedy Plaza to RI Hospital terminating at Eddy & Thurbers. Afternoon trips will originate from Eddy & Thurbers, service RI Hospital and then depart downtown as scheduled. The following trips have been added. Inbound: 6:00am. Outbound: 4:03pm.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

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*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase and rebranding.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Summer 2014

### Description of Service Change:

**1 Eddy / Hope / Benefit.** 1 Eddy, 42 Hope St. and 77 Benefit/Broadway have been consolidated into one route. Service has been redesigned to operate between South Attleboro Train Station and T.F. Green Airport. Service will operate every 20 minutes between downtown Pawtucket and Shaw's Post Rd. Warwick. Every other trip will extend to either South Attleboro Station in the northbound direction or TF Green Airport in the southbound direction. Service will operate northbound via Post Rd. (L) Warwick Ave. - Broad St. - Eddy St. into downtown Providence. Then service will continue through East Side Tunnel and operate via Hope St. - East Ave. into downtown Pawtucket. The final extension of service will operate via Broadway - Benefit - Cottage St. then (L) onto Newport Avenue terminating at South Attleboro Station.

Major  Minor Service change does not meet major service change definition thresholds.

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:



## Title VI Review – Service Change

Choose Up: Summer 2014

Description of Service Change: Route 13 Arctic

Sunday & Holiday - Service has been added operating every 90 minutes.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

### *Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

### Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

### Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Summer 2014.

Description of Service Change: Route 17 Dyer/Pocasset

Sunday & Holiday - Service has been added operating every 70 minutes.

Major     Minor

Location includes:

Minority Population  
 Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

**Description of Alternatives Considered:**

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:**

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:**



## Title VI Review – Service Change

Choose Up: Summer 2014

Description of Service Change: Route 35 Rumford

Service has been realigned to operate to South Attleboro Train Station. This line will no longer operate on Cottage St. serving Stop & Shop or deviate to Narragansett Industrial Park.

Major     Minor

Location includes:

- Minority Population
- Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

**Description of Alternatives Considered:**

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:**

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:** Segment eliminations are served by other routes; Stop and Shop terminus was replaced by South Attleboro Station.



## Title VI Review – Service Change

Choose Up: Summer 2014

### Description of Service Change: Route 61X Tiverton

Weekday Only - New express, limited stop service has been added between Fish Rd. Park-n-Ride in Tiverton and downtown Providence, Kennedy Plaza. There will be three inbound morning trips operating from Fish Rd. (P-n-R Lot) - Portsmouth (P-n-R Lot) - Mt. Hope Bridge - Metacom Ave - Franklin St.(P-n-R Lot)- Main St., Warren - Wampanoag Trail - I-195 then via East Side Tunnel. There will also be three afternoon outbound return trips operating along the same alignment.

Major     Minor

Location includes:

- Minority Population  
 Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    New express route.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:**



## Title VI Review – Service Change

Choose Up: Summer 2014

Description of Service Change: Route 98 Pawtucket Avenue

Service on Pawtucket Avenue will operate between downtown Pawtucket and Job Lot, Pawtucket Ave. Passengers traveling to Providence may use the R-Line from Main St., the 1 Eddy/Hope Line from East Ave. or transfer to the R-Line, 72 or 78 in downtown Pawtucket. Weekday & Saturday: Every 60 minutes, no service Sunday or Holiday.

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:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

**Substantial Legitimate Justification:** As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

**Mitigation Measures:**



## Title VI Review – Service Change

Choose Up: Winter 2015

Description of Service Change: 21 Reservoir

Weekday: Service will now operate every 30 minutes all day departing on the hour and half past the hour.

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:

The proposal for this change was developed as part of a 2012 Comprehensive Operational Analysis, an in-depth review of RIPTA's transit services which included an intensive public participation process with nine community meetings and 12 public hearings throughout the state, as well as a survey of approximately 10,000 riders in order to better understand where people need to travel, and what type of services they desire. In developing service change proposals, RIPTA balanced optimal service provision, cost neutrality, and social equity priorities, evaluating Title VI impacts and considering numerous alternatives for each route change proposal and for overall systemwide enhancement.

### Substantial Legitimate Justification:

As stated above, the decision-making process was comprehensive, inclusive, and considerate of equity concerns.

### Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2015

### Description of Service Change:

**62 Oxbow/Towne Center** This was a new limited service route to serve Oxbow Apartments that had lost service due to another change on route 63. This was implemented as a temporary mitigation measure to continue service to the apartment complex.

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:    No service.

### Substantial Legitimate Justification:

This was implemented as a temporary mitigation measure to continue service to the apartment complex.

### Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Winter 2015

Description of Service Change:

66 URI/Galilee Saturday service frequency was increased to operate every 45 minutes all day.

Major     Minor

Location includes:

Minority Population

Low Income Population

---

*Major Service Changes Only:*

Adverse Effect?     Yes     No    Service increase.

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

Description of Alternatives Considered:    No change.

**Substantial Legitimate Justification:**

The service increase was necessary to meet the heavy ridership demands on this route. Overcrowding was common on Saturdays mainly due to the very limited frequency.

Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Spring 2015

### Description of Service Change:

76 Central Ave. Weekday service has been rescheduled to operate every 85 minutes.

Major     Minor

### Location includes:

Minority Population

Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    Does not meet thresholds.

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:

Extremely low ridership resulted in unjustifiable investment in a non-performing route. RIPTA is exploring options for increasing ridership in this area of the city, which may involve merging with route 80.

#### Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Spring 2015

### Description of Service Change:

80 Armistice Blvd. Weekday service has been rescheduled to operate every 85 minutes.

Major     Minor

### Location includes:

Minority Population

Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    Does not meet thresholds.

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:

Extremely low ridership resulted in unjustifiable investment in a non-performing route. RIPTA is exploring options for increasing ridership in this area of the city, which may involve merging with route 76.

#### Mitigation Measures:



## Title VI Review – Service Change

Choose Up: Summer 2015

### Description of Service Change:

62 Oxbow/Towne Center Service will be improved between Oxbow and Towne Center on the restructured 63 Line. (see below) Therefore, Rte. 62 will be discontinued.

Major     Minor

### Location includes:

Minority Population  
 Low Income Population

---

### Major Service Changes Only:

Adverse Effect?     Yes     No    See Description/Substantial Legitimate Justification

Comparison Population:     Ridership     Census Population

Disparate Impact on Minorities?     Yes     No

Disproportionate Burden on Low Income Individuals?     Yes     No

### Description of Alternatives Considered:

No service.

### Substantial Legitimate Justification:

Route 62 was implemented as a temporary mitigation measure to continue service to the apartment complex. Now that the route 63 service is reinstated, route 62 is no longer needed.

### Mitigation Measures:

## Title VI Fare Change Equity Analysis – January 2016

### Introduction

RIPTA has proposed a fare change for public comment and consideration by the RIPTA Board of Directors. This report provides an evaluation of this proposed fare change based on FTA's Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA C 4702.1B), section IV-6, Requirement to Evaluate Service and Fare Changes. RIPTA's complete fare proposal is a two phase process detailed later in Table 1. The highlights of the proposal include:

- For full fare riders, the cost of transfers with cash will initially increase to \$1.00. Transfers with cash will be eliminated in phase 2.
- Riptiks and the 15-Ride pass will be eliminated and replaced with a 10-Ride ticket for \$20 in phase 1. In phase 2, the 10-Ride ticket will be replaced with a stored value smartcard that charges \$2.00 for one trip, including free transfers.
- 7-Day passes will increase in price from \$23.00 to \$25.00 in phase 1.
- Monthly passes will increase in price from \$62.00 to \$70.00 in phase 1 and be converted to rolling passes in phase 2 (valid for a period of 30 or 31 days from first use).
- Low income seniors and individuals with disabilities, whom RIPTA was previously prohibited by state law from charging a fare, will now pay one-quarter of the full adult fare or \$0.50 for an initial boarding and \$0.25 for a transfer.
- Phase 2 may also include new fare products for reduced fare riders.
- Following public hearings and consideration by the Board, Phase 1 has been modified from the original proposal to reduce the cash fares for low income seniors and individuals with disabilities. Phase 1 is currently in the process of being implemented. Phase 2 is proposed to be implemented after upgrades to RIPTA's fare collection technology. Since the implementation date of Phase 2 is unknown, this analysis focuses solely on Phase 1.

However, it is important to note that RIPTA's proposed fare change will not happen in isolation as there are multiple other programs that may pay the cost of transportation for specific trips made by certain riders. These programs include:

- Medicaid Non-emergency Travel – a program to provide Medicaid eligible individuals who need non-emergency transportation between their home and medical appointments.
- Veterans Transportation Service / Beneficiary Travel – a program which provides safe and reliable transportation to Veterans who require assistance traveling to and from VA health care facilities and authorized non-VA health care appointments, which can include public transit.
- RI Works – a program that provides temporary cash assistance, assistance with finding work or job training, and transportation reimbursement or bus passes when needed to support preparation for employment.

Based on its most recent rider survey, RIPTA estimates that about 20% of the trips it currently provides for no fare to low-income seniors and individuals could be subsidized by these programs, which can therefore substantially reduce the impact that would otherwise result from the proposed fare increases.

## Description of Fare Equity Analysis Policies and Procedures

RIPTA's Service and Fare Change Equity Analysis policies and procedures, and the public involvement process that led to these policies, are described in RIPTA's 2015 Title VI Program. This section provides a brief description of these policies and the public process.

### Determining When a Disparate Impact Occurs

Determining whether a fare change would have a discriminatory impact on the basis of race, color or national origin is based on the following:

- If the proposed change includes a change in the fare structure or a change in fares by fare payment method that is close to equal across all fare categories and fare payment methods, there is a determination that there is no disparate impact. However, if a fare change includes a differential percentage change of greater than 10% by customer fare category or payment method it is examined further.
- The following fare changes are considered to not require a disparate impact analysis, a:
  - (1) promotional fare reductions lasting no longer than six months,
  - (2) temporary fare reductions mitigating construction or other activities disrupting rider travel patterns, or
  - (3) declared "fare free" days such as Air Quality Alert days.
- 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, then the fare change would be determined to have a disparate impact.

RIPTA's general approach for calculating the average percentage fare increase for any group of riders is as follows:

- (1) Determine the number and percent of overall riders and minority riders who use each fare category being changed;
- (2) Review current fares vs. proposed fare change; and
- (3) Compare the statistical percentage differences for each particular fare media between minority users and overall users.

For this fare change, RIPTA does not have customer survey data on the use of specific fare products by minority riders. The following process was used to estimate the number and percent of overall riders and minority riders in each fare category and using each fare product.

- a. Calculate percent minority population in the service area for each route and flex zone.
- b. Estimate the estimated minority boardings per fare category on each route, assuming that percentage of riders in each fare category and using each fare product on a route / flex zone who are minorities equals the percent minority population in the service area for that route / flex zone.
- c. Total the overall boardings per fare category across all fare categories and fare products.
- d. Estimate the percent use of each fare category/product by minorities by dividing the estimated minority boardings for that fare category/product by the total boardings for that fare category/product.

In addition, this fare change involves implementing fare charges for riders who do not currently pay a fare. The percentage change in fares for these riders is mathematically undefined. We have therefore calculated the average fare paid by minority riders and by all riders before and after the fare change and used these values to calculate the average percentage fare increase for minority riders and for all riders.

## Determining When a Disproportionate Burden Occurs

Determining whether a fare change would have a disproportionate burden on low-income riders is based on the following:

- If the proposed change includes a change in the fare structure or a change in fares by fare payment method that is close to equal across all fare categories and fare payment methods, there is a determination that there is no disproportionate impact. However, if a fare change includes a differential percentage change of greater than 10% by customer fare category or payment method it is examined further.
- The following fare changes are considered to not require a disproportionate burden impact analysis, a:
  - (1) promotional fare reductions lasting no longer than six months,
  - (2) temporary fare reductions mitigating construction or other activities disrupting rider travel patterns, or
  - (3) declared “fare free” days such as Air Quality Alert days.
- If the average percentage fare increase for low-income riders is five percentage points or more higher than the average percentage fare increase for non-low-income riders, then the fare change would be determined to have a disproportionate burden on low-income riders.

RIPTA’s general approach for calculating the average percentage fare increase for any group of riders is as follows:

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

The percentage of riders using each fare product who are low-income riders is calculated based on RIPTA’s 2012 Rider Survey. These percentages are then multiplied by the number of boardings by fare product to provide the number of low-income boardings by fare product.

As discussed above, this fare change involves implementing fare charges for riders who do not currently pay a fare. The percentage change in fares for these riders is mathematically undefined. We have therefore calculated the average fare paid by minority riders and by all riders before and after the fare change and used these values to calculate the average percentage fare increase for minority riders and for all riders.

## Public Participation Process

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 datasets were initially identified by RIPTA technical staff, then thoroughly vetted through a public process that included a formal public comment period and a community meeting (Community Leadership Workshop) with members of the affected populations. RIPTA worked with and received input from representatives of organizations representing the gamut of Title VI protected communities including African American, Latino, Cape Verdean, Portuguese, and refugee and newly-arrived immigrant communities.

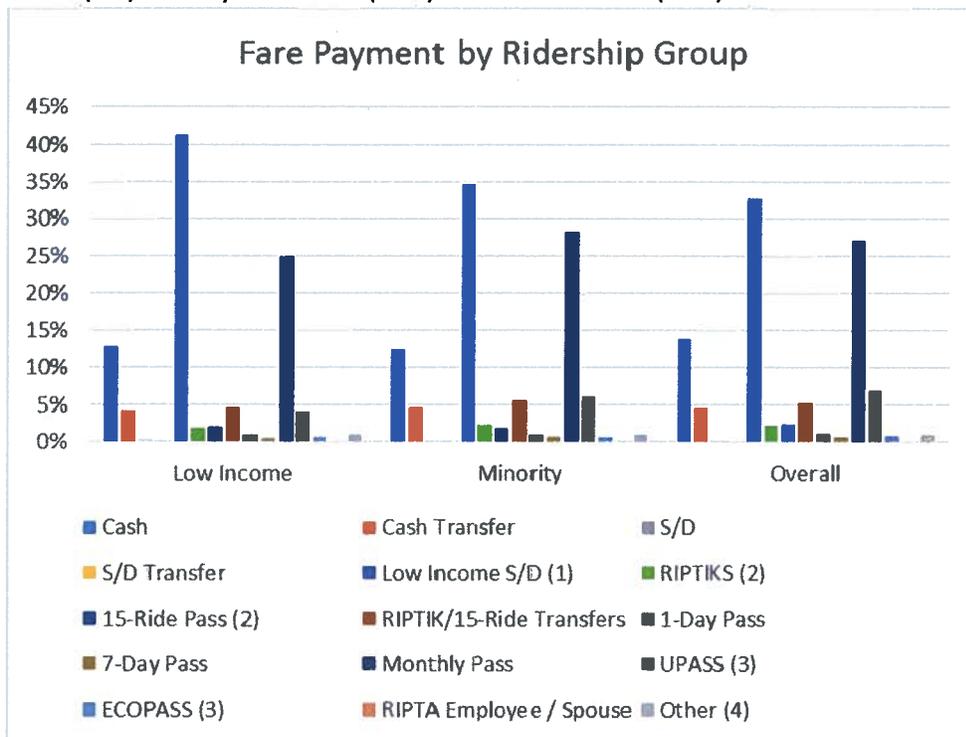
Because of the complexity of these SAFE policies and procedures, RIPTA developed a comprehensive agenda for its Community Leadership Workshop to meaningfully engage key organizational representatives in the policy development and approval process. The objectives of this workshop were to (1) spread the 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 policies should be modified in any way, and (5) seek general comment and input regarding RIPTA's equity program.

The workshop was attended by minority, low-income, and LEP contacts from throughout RIPTA's service area. A number of questions were addressed including how organizations representing minority and low-income populations could be engaged in the ongoing review of SAFE analyses so as to better understand impacts. RIPTA 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 process.

### Analysis of Fare Product Use

The following presents a profile of fare usage by group – minority, low-income and overall ridership and an analysis of whether minority and/or low-income riders are disproportionately more likely to use the payment type or fare media that would be subject to the fare increase or decrease. It further presents the number and percent of users of each fare media proposed for increase or decrease.

As is shown in the table, fare payment is similar across all ridership groups. The biggest difference is the Low Income Senior / Disabled fare, which is used by 39% of low income riders, 32% of minority riders, and 32% of overall riders. Cash and cash transfers are more likely to be used by low income riders (15%) and minorities (16%) than by overall riders (10%). The monthly pass is used less by low income riders (23%) than by minorities (26%) and overall riders (27%). The UPASS is also used less by low income riders (8%) than by minorities (13%) and overall riders (15%).



Change in Fares and Usage by Group							
Count	Cost		Change		Usage by Group		
Fare Type	Existing	Proposed	Absolute	Percentage	Low-Income	Minority	Overall
Cash	\$ 2.00	\$ 2.00	\$ -	0%	1,479,243	857,513	2,211,124
Cash Transfer	\$ 0.50	\$ 1.00	\$ 0.50	100%	472,209	305,563	705,843
S/D	\$ 1.00	\$ 1.00	\$ -	0%	32,884	11,600	35,977
S/D Transfer	\$ 0.25	\$ 0.50	\$ 0.25	100%	10,391	4,285	11,368
Low Income S/D (1)	\$ -	\$0.44	\$ 0.44	Undefined	4,767,546	2,359,718	5,216,132
RIPTIKS (2)	\$ 2.00	\$ 2.00	\$ -	0%	219,388	152,121	353,280
15-Ride Pass (2)	\$ 1.73	\$ 2.00	\$ 0.27	15%	234,364	128,512	377,397
RIPTIK/15-Ride Transfers	\$ -	\$ -	\$ -	0%	511,819	372,895	824,185
1-Day Pass	\$ 6.00	\$ 6.00	\$ -	0%	118,251	71,434	190,418
7-Day Pass	\$ 23.00	\$ 25.00	\$ 2.00	9%	67,602	43,602	108,857
Monthly Pass	\$ 62.00	\$ 70.00	\$ 8.00	13%	2,871,681	1,918,485	4,331,342
UPASS (3)	\$ 1.79	\$ 1.79	\$ -	0%	472,363	419,523	1,095,958
ECOPASS (3)	\$ 1.57	\$ 1.57	\$ -	0%	84,703	48,206	136,397
RIPTA Employee / Spouse	\$ -	\$ -	\$ -	#DIV/0!	10,142	6,304	16,331
Other Free	\$ -	\$ -	\$ -	0%	62,153	43,860	100,085
Other (4)	\$ -	\$ -	\$ -	0%	112,304	64,549	170,581

(1) All low-income seniors and individuals with disabilities currently pay no fare. Several new fare products are proposed to be introduced for this group, and the "proposed" fare is the estimated average fare that these individuals would be charged.

(2) RIPTIKS and 15-Ride Passes are proposed to be eliminated and replaced by a 10-Ride ticket. These are therefore the cost per trip with these fare products.

(3) Schools and employers pay different amounts for these fare products. These are the average cost per boarding.

(4) This includes equipment malfunctions, short-term promotional fares, and discontinued subsidized fares.

Change in Fares and Percentage Usage by Group							
Count Fare Type	Cost		Change		Percent Usage by Group		
	Existing	Proposed	Absolute	Percentage	Low-Income	Minority	Overall
Cash	\$ 2.00	\$ 2.00	\$ -	0%	13%	13%	14%
Cash Transfer	\$ 0.50	\$ 1.00	\$ 0.50	100%	4%	4%	4%
S/D	\$ 1.00	\$ 1.00	\$ -	0%	0%	0%	0%
S/D Transfer	\$ 0.25	\$ 0.50	\$ 0.25	100%	0%	0%	0%
Low Income S/D (1)	\$ -	\$0.44	\$ 0.44	Undefined	41%	35%	33%
RIPTIKS (2)	\$ 2.00	\$ 2.00	\$ -	0%	2%	2%	2%
15-Ride Pass (2)	\$ 1.73	\$ 2.00	\$ 0.27	15%	2%	2%	2%
RIPTIK/15-Ride Transfers	\$ -	\$ -	\$ -	0%	4%	5%	5%
1-Day Pass	\$ 6.00	\$ 6.00	\$ -	0%	1%	1%	1%
7-Day Pass	\$ 23.00	\$ 25.00	\$ 2.00	9%	1%	1%	1%
Monthly Pass	\$ 62.00	\$ 70.00	\$ 8.00	13%	25%	28%	27%
UPASS (3)	\$ 1.79	\$ 1.79	\$ -	0%	4%	6%	7%
ECOPASS (3)	\$ 1.57	\$ 1.57	\$ -	0%	1%	1%	1%
RIPTA Employee / Spouse	\$ -	\$ -	\$ -	0%	0%	0%	0%
Other Free	\$ -	\$ -	\$ -	0%	1%	1%	1%
Other (4)	\$ -	\$ -	\$ -	0%	1%	1%	1%

(1) All low-income seniors and individuals with disabilities currently pay no fare. Several new fare products are proposed to be introduced for this group, and the "proposed" fare is the estimated average fare that these individuals would be charged.

(2) RIPTIKS and 15-Ride Passes are proposed to be eliminated and replaced by a 10-Ride ticket. These are therefore the cost per trip with these fare products.

(3) Schools and employers pay different amounts for these fare products. These are the average cost per boarding.

(4) This includes equipment malfunctions, short-term promotional fares, and discontinued subsidized fares.

## Analysis of Impacts

As shown above, there are increases in five fare products, each of which is discussed below.

- Cash Transfer for full fare riders – The cost of purchasing a transfer with cash is doubling from \$0.50 to \$1.00. This fare product is used to a similar by minorities, low-income individuals, and RIPTA's overall ridership. RIPTA currently offers, and will continue to offer a fare product that allows riders to pay for individual trips at no greater than the cash price and offers free transfers. Currently, these fare products are the RIPTIK and the 15-Ride Pass. RIPTA is proposing to convert these products into a 10-Ride Pass, which will have the same initial boarding cost as cash and will provide free transfers. Riders impacted by this fare increase can switch to the 10-Ride Pass, with the result that their travel costs will decrease (since the cost of transfers will change from \$0.50 to free).
- Cash Transfer for Seniors and Individuals with Disabilities not qualifying as Low Income – The cost of purchasing a transfer with cash is doubling from \$0.25 to \$0.50. This fare product is used to a similar by minorities, low-income individuals, and RIPTA's overall ridership.
- Free Fare for Low Income Seniors and Individuals with Disabilities – Until recently, Rhode Island statutes prohibited RIPTA from collecting a fare from these individuals. This statute has now been eliminated and RIPTA is proposing to begin collecting fares from these individuals. This fare product is used to approximately the same extent by minorities and overall riders, but to a significantly greater extent by low-income individuals. Since this fare increase has a starting level of \$0.00, the percentage fare increase for this group is mathematically undefined. The

proposed fare for cash boardings is \$0.50 and for a transfer is \$0.25. The average cost per boarding for these riders will now be \$0.44. Furthermore, RIPTA has identified three programs that can fund many of the trips taken by these low-income seniors and individuals with disabilities. After considering these programs, RIPTA anticipates that the net out-of-pocket average cost of trips by these riders will be approximately \$0.35.

- 15-Ride Pass – This fare product will be eliminated and riders currently using it are assumed to switch to the most similar product, the 10-Ride Pass. The 15-Ride pass is currently used to approximately the same extent by low-income riders, minorities, and overall riders. (RIPTIKs will also be eliminated, however the replacement product, the 10-Ride Pass, will be effectively the same product with a clearer name and packaged as a smartcard rather than a magnetic stripe card).
- 7-Day Pass – This fare product has the lowest percentage fare increase of any fare product being increased. There is no significant difference in the use of this pass between low-income riders, minority riders, and overall riders.
- Monthly Pass – This fare product is being increased by about the same percentage as the 15-Ride Pass and is slightly more heavily used by minority riders than overall riders and slightly less heavily used by low-income riders than overall riders. Riders will have the option of switching to the 1-Day pass, the 7-Day pass, or the 10-Ride pass, all of which have a smaller percentage fare increase, however for riders traveling more frequently than 1 round trip, 4 days per week, every week, this is still the lowest cost alternative.

As stated above, RIPTA has identified three programs which a low-income rider could use to subsidize many of his or her trips. These programs are:

- Medicaid Non-emergency Travel – This is a program to provide transportation subsidies to Medicaid eligible individuals who need non-emergency transportation between their home and medical appointments.
- Veterans Transportation Service / Beneficiary Travel – a program which provides safe and reliable transportation to Veterans who require assistance traveling to and from VA health care facilities and authorized non-VA health care appointments, which can include public transit.
- RI Works – a program that provides temporary cash assistance, assistance with finding work or job training, and transportation reimbursement or bus passes when needed to support preparation for employment.

RIPTA estimates that about 20% of the trips it currently provides for no-fare to low-income seniors and individuals with disabilities could be subsidized by these programs. This would reduce the real average fare paid by this group under the proposed fare structure from approximately \$0.44 to approximately \$0.35, a substantial reduction in the impact that would otherwise result from the proposed fare increases.

A key element of this fare increase is that RIPTA will need to distribute new IDs and/or stored value fare media to low-income seniors and individuals disabilities to insure that they can pay the new low-income fare, rather than being changed the higher fare for most seniors and individuals with disabilities.

### Average Impact on Low-Income and Minority Riders in Comparison With Overall Riders

Because the fare increase for low-income seniors and individuals with disabilities is undefined, it is impossible to average the increases in fares of each fare product. We have therefore calculated the

average fare paid by low-income, minority and overall riders currently and the average fare that would be paid by each group if the proposed fare change were implemented. These average fares, and the percentage increase in fares for each group, are shown in the table below.

	Current Average Fare	Proposed Average Fare	Percent Change in Average Fare
Low-Income Riders	\$ 0.83	\$ 1.09	31%
Minority Riders	\$ 0.92	\$ 1.16	26%
Overall Riders	\$ 0.96	\$ 1.19	24%

As shown above, the proposed fare change would increase the average fare paid by minority riders by 2% more than the average fare paid by overall riders. The definition of disparate impact states that if the increase in fares paid by minority riders is more than 5% greater than the increase in fares for overall riders, there is a disparate impact. Accordingly, this proposed fare increase would not involve a disparate impact.

As shown above, the proposed fare change would increase the average fare paid by low-income riders by 7% more than the average fare paid by overall riders. The definition of disproportionate burden states that if the increase in fares paid by low-income riders is more than 5% greater than the increase in fares for overall riders, there is a disproportionate burden. Accordingly, this proposed fare increase would involve a disproportionate burden.

The table below shows the same information as the table above, but assumes that 20% of trips taken by low-income seniors and individuals with disabilities are subsidized by other programs, and therefore have an effective cost of \$0.00.

	Current Average Fare	Proposed Average Fare	Percent Change in Average Fare
Low-Income Riders	\$ 0.83	\$ 1.05	27%
Minority Riders	\$ 0.92	\$ 1.13	22%
Overall Riders	\$ 0.96	\$ 1.16	21%

As shown in this table, this assumption significantly reduces the effective fare increase for all groups, with the greatest reduction for low-income riders. The effective difference in average fare increases between minority riders and overall riders is now 1%, while the difference for low-income riders and overall riders has been reduced to 6%.

### Alternatives and Mitigation

As the proposed alternative would have a disproportionate burden on low-income riders, RIPTA is required to take steps to avoid, minimize or mitigate impacts where practicable, as well as to describe alternatives available to low-income populations affected by the fare change. In this case, the principal origin of the disproportionate burden is that low-income seniors and individuals with disabilities do not currently pay any fare. As stated above, RIPTA has reduced the originally proposed increase for low-income seniors and individuals with disabilities from \$1.00 base fare and \$0.50 transfers to a \$0.50 base fare and \$0.25 transfers. RIPTA has two principal objectives with regard to this element of their fare increase: (1) to insure all riders are contributing to the cost of operating the transit system and (2) take

advantage of programs that will fund trips for its low-income riders rather than providing the trips for free. Since RIPTA cannot charge different fares based on the purpose of a trip, this requires that RIPTA charge a fare for all seniors and individuals with disabilities, regardless of whether they are low-income individuals. Furthermore, it is important to note that the end result of this fare increase is that these riders will still be paying a lower fare than other seniors and individuals with disabilities, and a much lower fare than full fare riders.

RIPTA is taking steps to minimize and mitigate impacts where practicable. At the request of many social service agencies, RIPTA has created a fare product specifically targeted at these agencies to provide free transit service to their clients on a trip-by-trip basis. These 2-hour bus passes are only available in bulk quantities and are limited to tax-exempt organizations. Other mitigation efforts include a campaign to educate riders with respect to other programs that can provide subsidies for transit travel.

## Conclusion

This analysis has demonstrated that there will be no disparate impact on minority riders of RIPTA's system from this proposed fare change. It has also demonstrated that while there will be a disproportionate burden on low-income riders from this proposed fare change, this is the direct result of a change in state law so that RIPTA will no longer be required to carry certain low-income riders for free. The proposed fare change will require these low income riders to pay a lower fare than other seniors and individuals with disabilities. RIPTA's new fares have incorporated changes to minimize and mitigate the impact of this fare change compared to its original proposal, and RIPTA is taking additional steps to minimize and mitigate the impacts of this fare change where practicable.