



**RHODE ISLAND PUBLIC TRANSIT AUTHORITY**

**TITLE VI**

**PROGRAM**

**2021 - 2024**

*SUBMITTED MARCH 2021*

# RIPTA Title VI Program: 2021-2024

## Contents

Introduction .....	3
Chapter 1 General Requirements .....	4
Title VI Policy .....	4
Notification to Beneficiaries of Protection Under Title VI .....	5
Procedures for Filing and Investigating Civil Rights Complaints .....	5
Investigations, Complaints, and Lawsuits: 2018-21 .....	7
Plan for Providing Meaningful Access for Persons with Limited English Proficiency .....	8
Language Assistance Plan .....	16
Monitoring and Evaluating Language Assistance Plan .....	17
LEP Training .....	18
Public Participation Plan .....	18
Construction Projects .....	29
Chapter 2 Demographic Data and Maps .....	30
Demographic and Service Profile Maps and Charts.....	30
Demographic ridership and travel patterns .....	34
Minority representation on planning bodies and advisory bodies.....	34
Subrecipient compliance .....	36
Chapter 3 Service Standards and Policies .....	37
Systemwide Service Standards .....	37
Vehicle Loading .....	37
Minimum Service Frequencies .....	38
Routes Should Operate Along a Direct Path .....	39
Route Deviations Should be Minimized .....	39
On-Time Performance .....	40
Service Coverage .....	40
Stops Should be Spaced Appropriately .....	42
Systemwide Service Policies .....	43
Distribution of Transit Amenities .....	43
Vehicle Assignment .....	43
Chapter 4 Service and Fare Changes .....	46
Service Change Equity Analysis .....	46
Fare Change Equity Analysis .....	50
Public Involvement .....	52
Service and Fare Change Equity Analyses .....	54



Chapter 5 Service Monitoring .....	55
Requirement to Monitor Transit Service.....	55
Vehicle Load .....	56
Vehicle Headway .....	57
On-Time Performance .....	59
Distribution of Transit Amenities .....	60
Vehicle Assignment .....	61
Service Availability .....	62

## **Appendix**

<u>Exhibit A</u>	Board of Directors Resolution – March 2021
<u>Exhibit B</u>	Notification to Beneficiaries of Protection Under Title VI Brochure
<u>Exhibit C</u>	Rhode Island Public Transit Authority Title VI Complaint Form
<u>Exhibit D</u>	Voiance Interpreter Access Instructions
<u>Exhibit E</u>	Language Assistant Cards located in all transit centers and RIPTA Vehicles
<u>Exhibit F</u>	Rider Survey Report
<u>Exhibit G</u>	Service and Fare Change Equity Analyses

# INTRODUCTION

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This document constitutes the Rhode Island Public Transit Authority's 2021 Title VI Program, as approved by the Board of Directors at its March 2021 meeting. The Board Resolution approving the Program is attached as Exhibit A.

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 ONE

## GENERAL REQUIREMENTS

### TITLE VI POLICY

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

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

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

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

receiving and investigating complaints, which come through various intake venues, including the Customer Service department.

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

## NOTIFICATION TO BENEFICIARIES OF PROTECTION UNDER TITLE VI

A Notification to Beneficiaries of Protection Under Title VI is available as a brochure (Appendix, Exhibit B) in English and Spanish at the following locations: at RIPTA transit centers in Downtown Providence, Newport, and Pawtucket, at RIPTA's Elmwood Avenue operations and management facility, and on all fixed-route buses and paratransit vehicles. The Notice is also available on RIPTA's website in eight safe harbor languages.

## PROCEDURES FOR FILING AND INVESTIGATING CIVIL RIGHTS COMPLAINTS

The following procedures are employed for the investigation and resolution of all Title VI and other civil rights complaints received by RIPTA.

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 (Appendix, Exhibit C) in either English or Spanish and submitting it to RIPTA via U.S. Mail.

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



2. All complaints, written or verbal, shall be accepted. In the event a complainant sets forth allegations verbally and refuses to reduce such allegations to writing, the person to whom the complaint is made shall reduce the complaint to writing. Complaints should include the following information:

- Name, address, and telephone number of the complainant, if provided;
- Basis of the complaint: race, color, national origin, sex, age, or disability;
- Date on which the alleged discriminatory event occurred;
- Nature of the incident that led the complainant to believe that discrimination was a factor;
- Location, date, time, and other identifying information; employee badge number; and number of vehicle, if known;
- Names, addresses, and telephone numbers of persons (witnesses) who may have knowledge of the event; and
- Other agencies or courts where complaint may also be filed and a contact name for each.

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

3. The appropriate staff person shall investigate regular civil rights complaints and assist the Compliance Officer in investigations of more serious and egregious complaints. Investigations may include identifying and interviewing persons with knowledge of the alleged Title VI violation (*e.g.*, the person making the complaint, witnesses, or anyone identified by the complainant) or anyone with relevant information. The person who has been accused of discriminating or committing a prohibited act will be notified and will be permitted to respond to the allegation. If necessary, additional information may be requested from the complainant and witnesses.
4. If warranted, meetings may also be held with the complainant to resolve the complaint. The investigator may request guidance from Compliance Officer, as deemed necessary.
5. Upon completion of the interviews and investigation, the investigator will develop a final report based on the facts and submit it to the Compliance Officer. The

report will contain the investigation team's findings and conclusions concerning the complaint as well as recommendations for corrective action and discipline, if necessary. If a civil rights violation is found to exist, appropriate action will be taken, monitored, and reported. Any actions taken as a result of the investigation team's findings and conclusions are the responsibility of the concerned department and other officials involved. If no violation is found and the complainant is not satisfied, complaints may be filed with FTA's Office of Civil Rights.

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

## INVESTIGATIONS, COMPLAINTS, AND LAWSUITS: 2018-21

### **Title VI Complaint Log**

Complainant	Alleged Person Discriminated	Basis of Alleged Discrimination	Date Complaint Filed	Date of Incident	Date Investigation Resolved	Status of Investigation / % Complete	Description of Alleged Discrimination	Date Investigation Completed	Result of Investigation
Lichty, David	Dufrense, John	Mental Illness	2/10/2020	2/2/2020	2/10/2020	100%	Alleged assault of passenger with mental disability by bus operator	2/14/2020	No disciplinary action taken; no charges filed to date
Silvia, David	Self	Physical Disability	5/20/2020	1/8/2020	5/20/2020	100%	Alleged abandonment of passenger with disability at RIDE pick-up location	7/28/2020	Complaint denied by Judge

## PLAN FOR PROVIDING MEANINGFUL ACCESS FOR PERSONS 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 states that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part:

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

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

### **Who is an LEP Individual?**

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

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

### **Determination of Need**

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

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

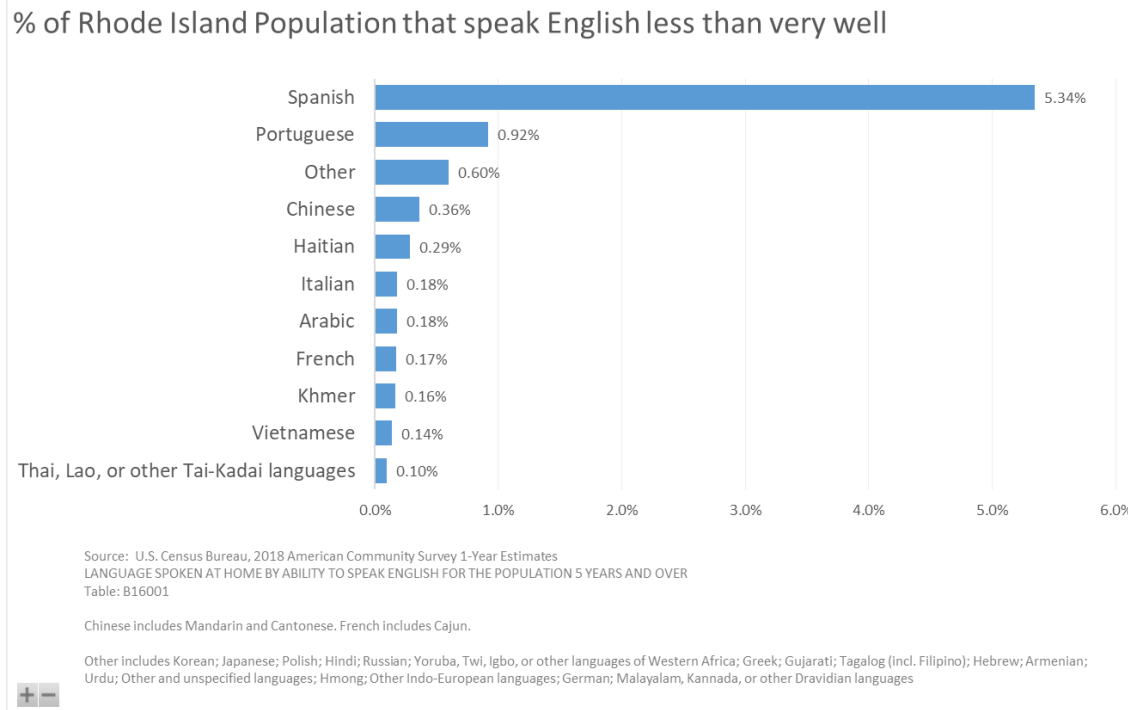
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### **Factor 1:**

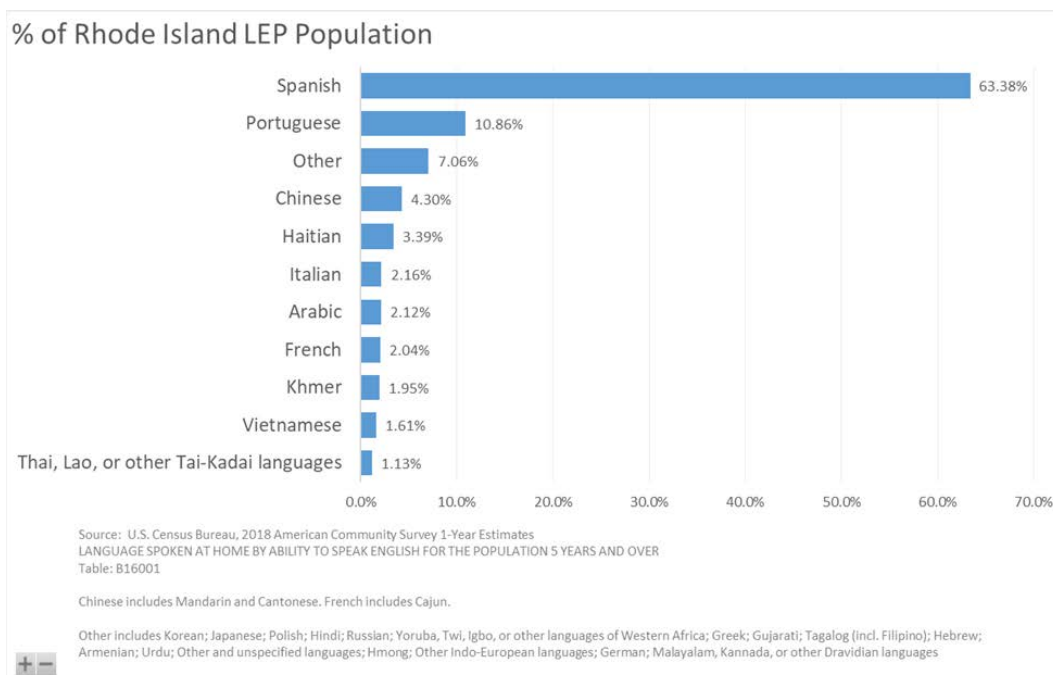
#### **The number and proportion of LEP Persons served or encountered in RIPTA's service area.**

RIPTA's service area is the entire State of Rhode Island, which has an estimated total population of 1,002,885 (excluding children under five). RIPTA has determined the percentage of the State's LEP population by consulting the 2018 American Community Survey by the U.S. Census Bureau. The survey shows that 84,572 individuals (8.4%) in Rhode Island have Limited English Proficiency because they speak English less than "very well."





Spanish speaking LEP Persons (5.34%) are the only group that represents more than 1% of Rhode Island's total population. The next highest language groups were Portuguese (0.92%), Chinese (including Mandarin and Cantonese) (0.60%), Haitian (0.29%), Italian (0.18%), Arabic (0.18%), French (including Cajun) (0.17%), Khmer (0.16%), Vietnamese (0.14%) and Thai, Lao, or other Tai-Kadai languages (0.10%). No other language group accounts for more than .10% of Rhode Island's total population.



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## 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 200 languages. From January 1, 2018 to December 31, 2020, RIPTA received a total of 306 Voiance calls. This equates to an average of 102 calls per year or roughly two calls per week requesting translation into eight different languages.

Spanish was overwhelmingly the most requested language. During the three-year period, Spanish made up 97.71%, Russian 1.31%, Mandarin 0.65%, and .33% Somali. In 2018, the 100% of the requests were for Spanish. In 2019, Spanish represented 97.8%, Russian represented 1.1% and Mandarin represented 1.1%. In 2020, 97.1% of requests were for Spanish, 1.7% for Mandarin, .6% for Russian and .6% for Somali.

#### Internal RIPTA Survey

In December 2020, 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 805 surveys sent, 170 surveys were completed, for a response rate of about 21%. The surveys were divided among four groups (1) Customer Service staff (16 surveys completed); (2) Administrative staff (51 surveys completed), 3) Fixed-Route Drivers (33 surveys completed); and (4) Paratransit Drivers (70 surveys completed). The following are the highlights of the customer service and administrative staff survey results:

- On average, customer service staff assists LEP customers 2 times per week, with a range of zero to 5 times per week;
- On average, administrative staff assists LEP customers 1.5 times per week, with a range of zero to 5 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, Italian, Haitian Creole, and Arabic were encountered, but on an irregular basis;

- 20% of customer service and 19.6% administrative respondents reported that they are able and qualified to translate English into another language. The reported languages include Spanish, Portuguese, Portuguese Crioulo, Italian, French, and Haitian Creole.
- 87% of customer service respondents and 23% of administrative respondents reported that they have used translation assistance on the job. Of those respondents who provided answers to this question, they reported using the following translation methods:

	Customer Service	Administrative
Co-Worker	31%	83%
Telephone	92%	17%
Internet	38%	42%

- Other services mentioned included Voiance, Volunteers and “Pointing at Products.”

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

- Fixed-route drivers assist LEP customers an average of 15.4 times per week, with a range of zero to a hundred times per week. Paratransit operators assist LEP customers an average of 3.8 times per week, with a range from zero to seven times a week.
- Fixed-route and paratransit drivers most frequently encounter Spanish, Portuguese/Portuguese Crioulo, and Haitian Creole.
- Other languages mentioned by fixed-route and paratransit drivers as being encountered, with lesser frequency, were Cambodian, Italian, Chinese, Cape Verdean, Russian, Japanese and 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 15.4 times per week, fixed-route drivers had the most encounters with LEP individuals.

## External LEP Survey

RIPTA provided fifty-two 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. Fifty-two surveys were sent out and six were completed for a response rate of 12%. Following are the highlights of the questionnaire responses:

- When asked about client importance of RIPTA Programs and Services, the response rate was the following:

	Importance Rate (%)
Regular, fixed-route bus service covering most of the state	67
Flex service in areas with less robust service	50
Ride paratransit service for persons with disabilities	67
The availability of all schedules and maps on <a href="http://www.ripta.com">www.ripta.com</a>	0
The availability of a trip planner on <a href="http://www.ripta.com">www.ripta.com</a>	0
The availability of translation services through RIPTA's Customer Service	17
No-fare pass program for qualifying seniors and persons with disabilities	33
Wave smart cards and mobile app	0
The availability of bus racks on all fixed-route buses	0
New express service to Quonset Business Park	17
Downtown Transit Connector (DTC)	17

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<sup>1</sup> Those organizations are African Alliance of Rhode Island, AKA Sorority, Amos House, ARISE, Blackstone Valley Community Action Program, Cape Verdean Community Development Corporation (CACD), Cape Verdean Heritage Committee, Cape Verdean Progressive Center, Center for Southeast Asians, Central Rhode Island Chamber of Commerce, Children's Friend, Colombian Association, Community Action Partnership of Providence, Community Care Alliance, Cranston Comprehension Community Action Program, Delta Sigma Theta Sorority, Direct Action For Rights and Equality, Dorcas International, East Bay Community Action Program, East Providence Chamber, Ebenezer Baptist Church, Genesis Center, Ghana Association, Guatemalan Association, Haitian Community Center, Hispanic Business Association, Hope and Change for Haiti, Jamaican Association, Jewish Alliance of Greater RI, John Hope Settlement House, The King's Cathedral Church, The King's Tabernacle Church, Latino Policy Institute, League of Women Voters of RI, Liberian Association, Muslim Dawah Center, NAACP Newport County Branch, NAACP Providence Branch, New Bridges for Haitian Success, Nigerian Community of RI, Oasis International, Progreso Latino, Providence Chamber of Commerce, Refugee Dream Center, Rotary Club of Providence, Rhode Island Black Business Association, RI Family Literacy Initiative, Rhode Island Indian Council, Roman Catholic Diocese of Providence, South Providence Neighborhood Association, The Church of St. Michael the Archangel, Unified Solutions, USA Compassion Corps, West End Tabernacle Church, and Zeta Sorority.



- Some organizations mentioned specific transit needs of their LEP clients. Comments included:
  - Extend evening hours;
  - Translated transit materials (ex. bus schedules);
  - Expand bus service to areas currently inaccessible by bus;
  - Some areas are difficult to access, for example, parts of Middletown;
  - The cost is difficult for some to afford;
  - Fear of not being able to communicate;
  - Cost.
- The most commonly cited barriers to the LEP population's use of transit included language and affordability.

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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 prioritizes financial and staff resources to meet compliance goals and fulfill the provisions the LEP program on an as-needed basis. RIPTA currently employs the following resources to help provide language assistance. These resources are funded with RIPTA's operating funds.

**Dedicated Compliance Officer**

RIPTA employs a dedicated Compliance 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 Compliance Officer does this, primarily, by regular communication with groups who have significant LEP constituents. Communication is done through internal and external meetings, phone calls, emails and surveys. The goals of these communications are to identify documents, such as pages of the web site or public timetables that would assist LEP persons in accessing RIPTA programs and services.

**Marketing & Communications Department**

RIPTA's Marketing & Communications 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 hearings and comments on RIPTA's services. This Department works closely with the Compliance Officer to coordinate communication to the LEP population.

**Customer Service Department**

RIPTA's Customer Service Department receives questions, requests for information and assistance and complaints. One Customer Service representative can translate Spanish, and obtain assistance from other employees for Portuguese and Italian translation. All Customer Service representatives are trained in how to direct callers who need language assistance to

Voiance Language Services (described in greater detail below), which RIPTA uses to provide translations to all LEP individuals.

## 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 63% of Rhode Island's total LEP population. Portuguese is second at 11% of the LEP population. All other languages each represent less than 5% 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. (See Appendix, Exhibit D for the procedures used by RIPTA staff to connect LEP callers to Voiance.)

### **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, 2018 American Community Survey, Spanish speaking LEP Persons (5.34%) are the only group that represents more than 1% of Rhode Island's total population. The next highest language groups were Portuguese (0.92%), Chinese (including Mandarin and Cantonese) (0.60%), Haitian (0.29%), Italian (0.18%), Arabic (0.18%), French (including Cajun) (0.17%), Khmer (0.16%), Vietnamese (0.14%) and Thai, Lao, or other Tai-Kadai languages (0.10%). No other language group accounts for more than .10% of Rhode Island's total population.

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 Paratransit Service Certification, (4) Ride ADA brochure, (5) Public Hearing Notices, (6) Title VI brochure, and (7) Title VI complaint form. In August 2015, RIPTA posted translations of these documents into the seven safe harbor languages and Arabic on its website, [www.ripta.com](http://www.ripta.com). Based on its update of Factor 1 of the Four Factor analysis, RIPTA is now in the process of translating its vital documents into Haitian Creole. 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 seven safe harbor languages and Arabic, how to contact RIPTA for language assistance. Based on its update of Factor 1 of the Four Factor analysis, RIPTA is now in the process of updating the assistance cards to include Haitian Creole. The cards are placed in all transit centers and RIPTA vehicles, and may also be viewed on RIPTA's website. (The current language assistance card can be viewed in the Appendix at Exhibit E.)

### **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 each of the safe harbor languages. If Google Translate does not translate to the satisfaction of the customer, the customer can contact RIPTA's Customer Service Department, who can use Voiance for a better translation.

### **Other Language Assistance**

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

## **MONITORING AND EVALUATING LANGUAGE ASSISTANCE PLAN**

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

- Solicit input and feedback from the LEP community and RIPTA frontline staff, including drivers and customer service representatives;
- Measure changes in the number and proportion of LEP persons eligible to be served by examining updates from the Voiance Language Service, the U.S. 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 RIPTA website, frontline 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 and the results of the External and Internal LEP Surveys described in the Factor 2 section above.

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

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

## LEP TRAINING

As of January 2021, RIPTA has 559 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	413
Ride Bus Operator	91
Supervisor	25
Customer Service	30

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

## PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is a guide for RIPTA's ongoing public participation endeavors. Its purpose is to ensure that RIPTA utilizes effective means of provide information and receiving

public input on transportation decisions from low income, minority and limited English proficient (LEP) populations.

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

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

## **I. INTRODUCTION**

### **A. Rhode Island Public Transit Authority (RIPTA)**

RIPTA is a quasi-public, independent authority. Established in 1966, RIPTA is authorized to operate public transit services throughout the State of Rhode Island. The agency is governed by a governor-appointed eight member Board of Directors. RIPTA operates 3,159 daily trips on 57 statewide fixed bus routes. RIPTA provides discounted fares for seniors and persons with disabilities. Children ages 5 and under ride free when accompanied by an adult. RIPTA provides a variety of written and oral language assistance services.

### **B. Purpose of the Public Participation Plan (PPP)**

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

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

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

## **II. PUBLIC PARTICIPATION METHODS**

### **A. Introduction**

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

### **B. Methods and Considerations for Enhancing Participation**

#### ***I. Methods and Considerations for Enhancing Participation from Low Income Populations***

##### **1a. Meeting Considerations**

Meeting organizers will carefully consider meeting locations and times in order to enhance participation from low income communities. RIPTA will coordinate meeting times with transit schedules ensuring that evening meetings occur while return transit trips are readily available. Meetings will be held in accessible meeting locations, near or on a RIPTA bus line.

##### **1b. Methods for Publicizing Participation Opportunities**

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

#### ***II. Methods and Considerations for Enhancing Participation from LEP Populations***

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

##### **2a. Meeting Considerations**

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

##### **2b. Methods for Publicizing Participation Opportunities**

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

#### ***III. Methods and Considerations for Enhancing Participation from Minority Populations***

RIPTA will do outreach at community events and through neighborhood notices via email, Facebook posts and Tweets. RIPTA has developed productive working relationships with community organizations that serve people of color.

## **C. Menu of Public Participation Methods**

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

### **1. Printed and Electronic Materials Produced by RIPTA**

Outreach information can be publicized in print materials produced by RIPTA such as newsletters, flyers and posters. RIPTA newsletters include the monthly RIPTA e-newsletter. 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 bottom of its website written translation of vital documents in the eight languages in Rhode Island with more than 1,000 estimated LEP persons. RIPTA also distributes notices/flyers through community partners.

### **2. Printed Materials Produced by Other Organizations**

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

#### **2a. Local Service Providers**

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

#### **2b. Local Schools, Community Colleges and Universities**

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

### **3. RIPTA Website**

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

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

#### **4. Station Information Resources**

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

Information resources located in RIPTA stations that are used to communicate schedule and service can also be used to conduct outreach. RIPTA newsletters, bulletin boards, information kiosks and other information stations will also be used to promote participation opportunities.

#### **5. Media Targeted to Ethnic Communities**

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

#### **6. Coordination with Community Events**

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

#### **7. Coordination with Other Agencies**

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

#### **8. Regular Meetings of Civic and Community Organizations**

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

## **9. Community Meetings**

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

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

### **9a. Community Meeting Formats**

#### *i. Open House*

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

#### *ii. Large Group Discussion*

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

### **9b. Community Meeting Considerations**

#### *i. Scheduling*

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

#### *ii. Meeting Locations*

Convenient and comfortable meeting locations are key to soliciting active public participation, particularly in low income, minority and LEP communities. RIPTA can host meetings in venues including the local branch libraries, YMCA, local school or community colleges, churches and many others. It is important that meetings are held in different venues since it is unlikely that no one location is ideal for all community members. Meeting locations can be rotated to ensure access for as many community members as possible. Community partners should be reminded

that regardless of the popularity or convenience of a venue, RIPTA is required to conduct all public participation methods in locations that are fully accessible to persons with disabilities and the venues should be served by public transit.

### *iii. Meeting Times*

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

## **10. Focus Groups /Stakeholder Meetings**

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

## **11. Special Events**

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

## **12. Walking Tours and On-Site Meetings**

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

## **13. Telephone Information and Comment Line**

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

## **D. RIPTA's Ongoing Public Participation Methods**

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

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

- RIPTA website ([www.ripta.com](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;
- Voice Over the Phone Interpretation (OPI) Service;
- Language interpreters at public meetings; and
- Written language assistance services.

## PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

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

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

**Outreach for Downtown Transit Connector (DTC):** Starting in 2018, RIPTA began design work on the roughly \$13 million dollar new, high frequency bus transit corridor scheduled in downtown Providence. Public outreach included the following:

- Distributed flyer in English and Spanish about the project
- Website dedicated to the project in English and Spanish (<https://www.ripta-dtc.com>)
- Media releases issued to press at key points in the project
- Public hearing notices were posted approximately 14 days in advance of the hearings on the RIPTA website and in local newspapers in English and Spanish Notices were



also posted at RIPTA stations h

- In September 26, 2019, two public hearings were held in Providence
- Worked closely with Providence City officials to ensure that residents were kept up to date on the project
- The DTC was on the agenda at the open meeting of various Providence committees including the Bike and Pedestrian Advisory Committee (5/17/2017, 10/18/2017 and 11/15/2018) and the Downtown Design Review Committee (11/13/17 and 2/12/18)
- Presented project information to RIPTA's Accessible Transportation Advisory Committee (ATAC) on March 22, 2018, September 5, 2019, November 7, 2019, December 5, 2019, February 6, 2020, March 5, 2020, May 7, 2020, June 4, 2020 and September 3, 2020
- Presented project information to the Downtown Neighborhood Association and the Jewelry District Neighborhood Association, and held three informal drop in meetings targeted to local businesses along the route
- Held open public meetings on December 6, 2016, March 9, 2017 and March 5, 2018. The project team also participated in targeted meetings on Kennedy Plaza and Providence Station hub designs with the City and RIDOT
- Worked with State Legislators representing the area to make sure all constituent questions were answered and presented to the Coastal Resources Management Council on January 18, 2018
- Worked with Rhode Island Department of Transportation to ensure that public alerts were sent when construction work or temporary affected Providence roads
- Presented public updates at Providence City Council meetings
- RIPTA.com was updated with project updates and weekly construction updates were sent to a list of over 200 interested parties during the height of construction activity
- Passengers notified of project updates via social media and e-newsletter

**Outreach for Flash Pass App:** In June 2018, RIPTA announced the launch of its new app for iOS and Android mobile devices. The launch of the Flash Pass app, is part of Phase 1 of RIPTA's plan to upgrade and streamline its fare collection system. Public outreach included the following:

- Targeted Facebook ad campaign in English and Spanish
- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads, in both English and Spanish, were displayed on all buses
- Bus shelter advertisements in English and Spanish
- Bus advertisements, in English and Spanish
- RIPTA.com was updated with Flash Pass information

**Outreach for Transit Master Plan:** In 2018, RIPTA worked with the Rhode Island Department of Transportation (RIDOT) and the Division of Statewide Planning on the state's first Transit Master Plan called Transit Forward RI. The project will create a vision for the future of transit in Rhode Island and will look at different types of transportation including bus, rail, ferry and more. The plan

will identify both near and long-term investments to achieve a collective vision for transit in Rhode Island, as well as a strategy for implementation. Public outreach included the following:

- Dedicated website (<https://transitforwardri.com/>) with Google Translate available in 28 languages
- 7 public informational meetings in the north, south, southeast, and central regions of the state held on December 11, December 12, 2018; September 17, September 18, 2019; and October 10, 2019.
- 25 Pop-up informational sessions across Rhode Island
- In-person and online comment submission
- Distributed English and Spanish language Informational Handouts
- Presentation and discussion with RIPTA's Accessible Transportation Advisory Committee (December 6, 2018, January 24, 2019, June 6, 2019, August 1, 2019, September 5, 2019, October 3, 2019, November 7, 2019, December 5, 2019)
- Communication with various stakeholder groups including municipal officials, CommerceRI, RIPTA Transit Riders, GrowSmart RI, higher educational institutions, and business leaders
- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads were displayed on buses

**Outreach for Customer Satisfaction Survey:** In 2018, 2019 and 2020, RIPTA invited customers to take the annual American Bus Benchmarking Group (ABBG) Customer Satisfaction Survey, available online in English and Spanish. The survey dates were from Monday, April 9 through Sunday, May 6, 2018, Monday; March 18 through Sunday, April 14, 2019; and again Monday, March 9 through Sunday, April 15, 2020. Surveys like these help RIPTA better understand its customers' opinions of existing service and priorities areas that need improvement. Public outreach included the following:

- Onboard digital ads, in both English and Spanish, were displayed on all buses
- Targeted Facebook ad campaign in English and Spanish
- The NAACP Providence Branch, Progreso Latino, Southeast Asian Community Center, African Alliance of Rhode Island, Dorcas International, Genesis Center, and East Bay Community Action Program were contacted for help in reaching diverse populations
- RIPTA generated printed copies of survey for distribution at meal sites and community centers. Printed copies in English and Spanish were also available at RIPTA Customer Service stations at 705 Elmwood Ave., Providence
- RIPTA.com was updated with the survey information
- Media release issued to press
- Passengers and community partners notified via social media and e-newsletter
- Surveys in English and Spanish were distributed onboard and at bus stations
- Posted on Transit app

**Outreach for New Quonset Express Service:** In January 2019, RIPTA announced a pilot program to bring bus service to businesses at the Quonset Business Park in North Kingstown. Public outreach included the following:

- Distributed Quonset Express brochure in English and Spanish
- Targeted Facebook ad campaign in English and Spanish
- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads, in both English and Spanish, were displayed on all buses
- Bus shelter advertisements in English and Spanish
- RIPTA.com was updated with the new service
- Promoted on RIDOT's highway transit message signs

**Outreach for Proposed New Fare Structure:** In the fall of 2019, RIPTA announced that a proposed fare restructuring; the base fare of \$2 per boarding will remain the same, but other fares and products would be changed as the transit authority prepared for the launch of its new smart fare collection system with reloadable fare cards and more options for passengers. Public outreach included the following:

- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads, in both English and Spanish, were displayed on all buses
- RIPTA.com was updated with the proposed fare structure
- Public hearing notices were posted approximately 14 days in advance of the hearings on the RIPTA website and in local newspapers in English and Spanish. Notices were also posted at RIPTA stations
- In September and October 2019, twelve public hearings were held in Barrington, Providence, Narragansett, Warwick, Newport, and Pawtucket, thus covering all five Rhode Island counties

#### **Outreach for Using Transit During COVID-19**

In March 2020, RIPTA began educating passengers on how to stay healthy, and safely travel, during a pandemic. RIPTA continues to disseminate timely, useful and accessible information to our passengers. Public outreach included the following:

- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads, in Chinese, English and Spanish, were displayed on all buses
- Interior bus advertisements on paratransit vehicles
- Targeted Facebook campaign in English and Spanish featuring a 2 minute video
- Bus shelter advertisements in English and Spanish, also posted at major transit hubs
- Onboard audio announcements
- Information posted on LED screens at Kennedy Plaza, Newport Transportation and

Visitors Center and Green Airport

- CDC information sticker adhered to farebox (English, Spanish)
- CDC informational posters in English, Spanish and Chinese at all major transit hubs
- Information available online at RIPTA.com
- Distribution of FTA masks by drivers to passengers not wearing a mask

### **Outreach for New Smart Fare Technology System**

In September 2020, RIPTA announced its new smart fare technology system – Wave.

Public outreach included the following:

- Held a focus group, representative of all demographics, to provide feedback on fare system branding
- Media release issued to press
- Passengers notified via social media and e-newsletter
- Onboard digital ads, in both English and Spanish, were displayed on all buses
- Targeted Facebook campaign in English and Spanish
- Radio advertisements to air on local English and Spanish radio stations
- Bus shelter advertisements in English and Spanish, also posted at major transit hubs
- Bus advertisements, in English and Spanish
- Information available online at RIPTA.com

## **CONSTRUCTION PROJECTS**

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

# CHAPTER TWO

## DEMOGRAPHIC DATA & MAPS

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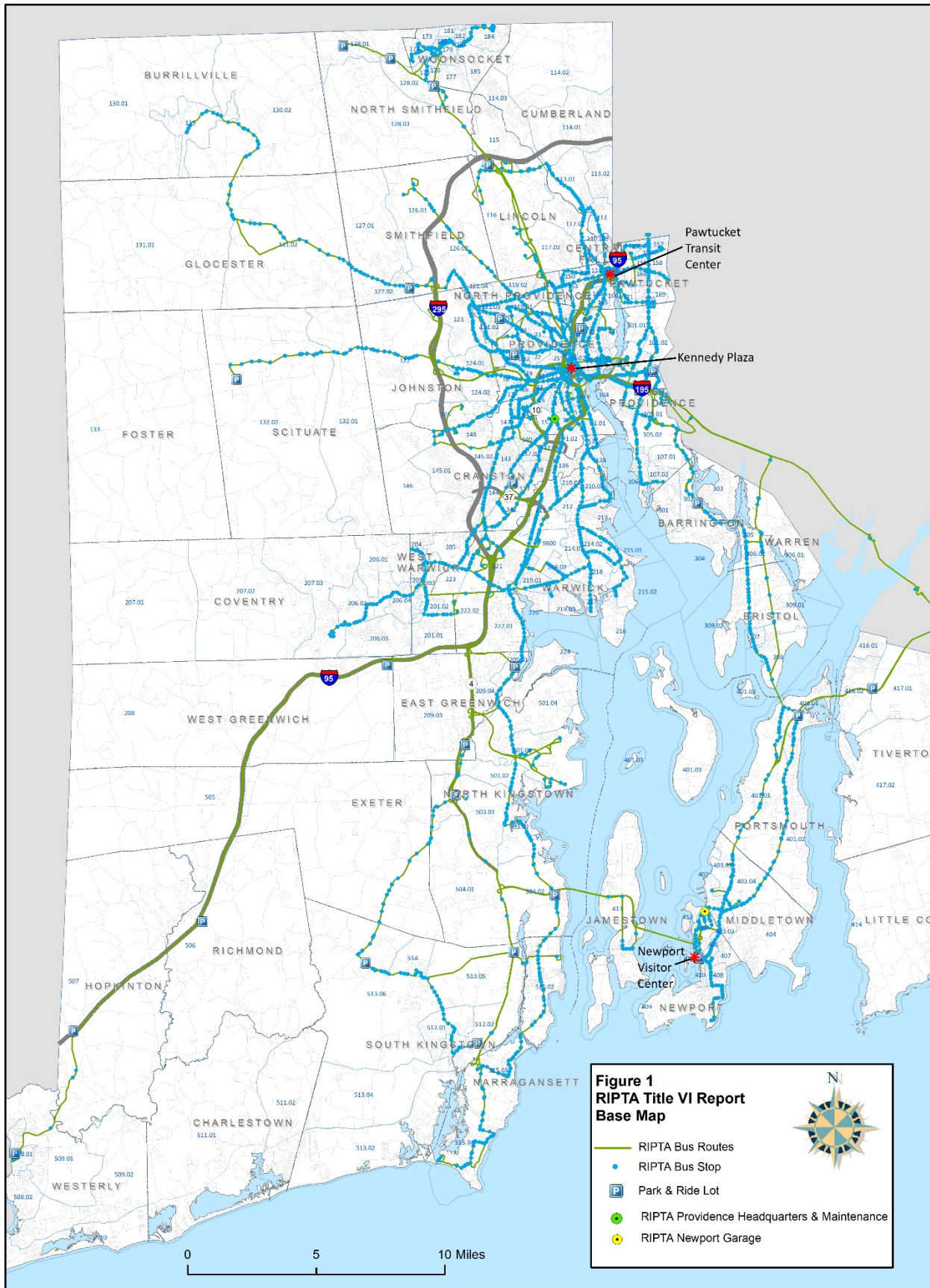
### DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

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

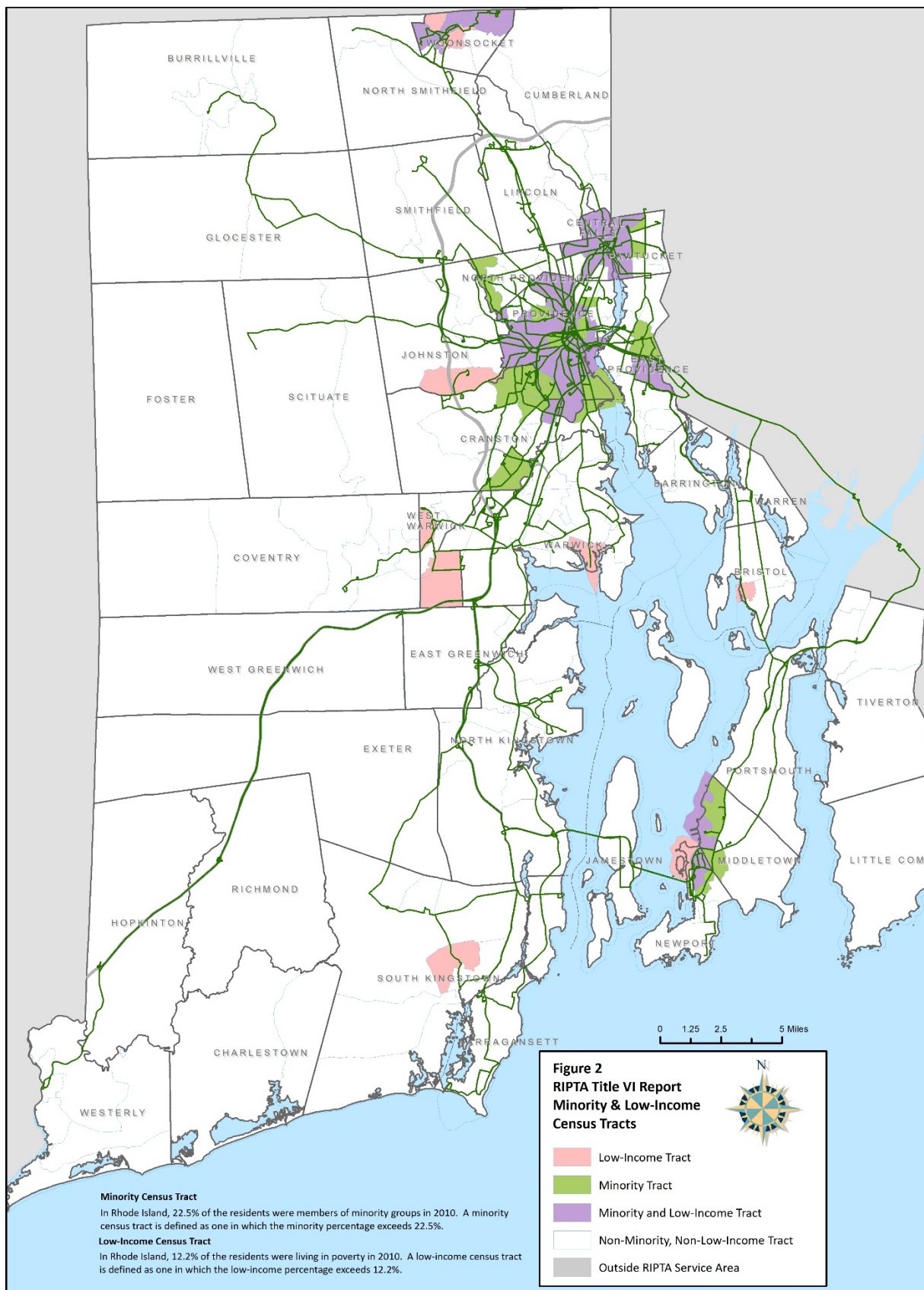
The 2010 Census shows that 12.2% of Rhode Island families are living in poverty. Figure 2 below illustrates all of the census tracts in the state that have a poverty rate of 12.2% or higher and/or a minority population of 22.5% or higher. Most of the minority and low-income population are concentrated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

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

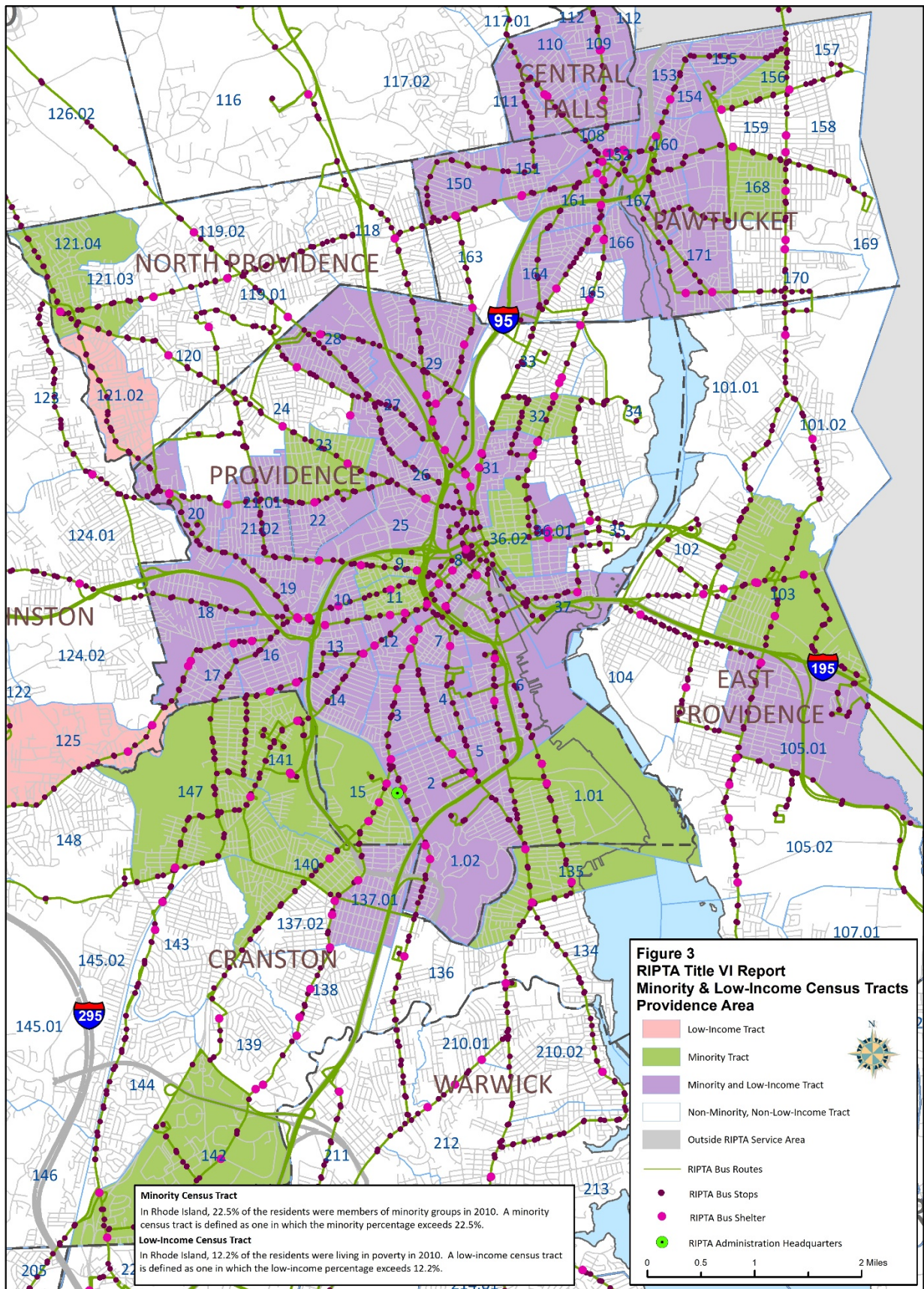
1. Figure 1: Base Map
2. Figure 2: Minority and Low-Income Census Tracts
3. Figure 3: Minority and Low-Income Census Tracts, Providence Area













## DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS

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

## MINORITY REPRESENTATION ON PLANNING BODIES AND ADVISORY BODIES

### **The Rhode Island Accessible Transportation Advisory Committee (ATAC)**

RIPTA's 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 on this committee, RIPTA has utilized its website, email list, and a promotional flyer. The committee currently has 15 members, one of whom is Black, and includes individuals with visual impairments and mobility challenges, as well as professionals who provide support services. To bring more diversity to the ATAC, RIPTA will continue to assist in the recruitment for potential members from minority groups by reaching out to our community partners and also to groups who serve the disabled community.

### **The Equal Opportunity Advisory Committee (EOAC)**

RIPTA's Equal Opportunity Advisory Committee (EOAC) is formed and designed to review RIPTA's Equal Opportunity policies and procedures, monitor Equal Opportunity goals and advise the Chief Executive Officer (CEO) on ways to improve and enhance RIPTA's Equal Opportunity efforts. The EOAC is not an investigative or disciplinary body. Instead, the EOAC is focused on ensuring RIPTA's compliance with Equal Opportunity laws and regulations and acts as an advisory resource for RIPTA's CEO.

Duties and responsibilities of the EOAC include the following:

- Develop short-term objectives promoting equal opportunity;
- Identify areas of possible discrimination;

- Quarterly review pertinent policies and procedures and monitor progress of goals and programs created to promote equal opportunity;
- Assist with the preparation of the Affirmative Action Plan as needed;
- Prepare and submit a quarterly progress report to the CEO.

The EOAC shall comprise of nine (9) active members and 5 alternatives. RIPTA's Diversity Liaison shall serve as Chairperson of the EOAC, ex-officio. The Chairperson shall prepare the agenda and preside over the committee meetings. The Chairperson shall also be responsible for submitting and presenting any committee recommendations to the CEO. The CEO shall review and acknowledge all recommendations of the committee. The EOAC Secretary shall be appointed by the CEO. The Secretary shall preside over the committee meetings in the absence of the Chairperson. The Secretary shall also be responsible for recording minutes of each meeting and preparing the minutes for distribution.

Membership is voluntary and shall be continuous until such time of resignation and/or at the sole discretion of the CEO. Members shall be selected from employed volunteers and approved by the CEO. Active membership vacancies shall be first offered to the alternate members. If an alternate member does not fill the vacancy, the opening will be publicized, RIPTA-wide, via notification affixed to employee paystubs.

Currently, the EOAC membership is as follows:

<b>RIPTA Department</b>	<b>Gender</b>	<b>Ethnicity</b>
<b>Maintenance</b>	<b>Male</b>	<b>Hispanic</b>
<b>Transportation</b>	<b>Male</b>	<b>Black</b>
<b>Paratransit Alternate</b>	<b>Male</b>	<b>Black</b>
<b>Human Resources</b>	<b>Female</b>	<b>White</b>
<b>Human Resources</b>	<b>Female</b>	<b>White</b>
<b>Human Resources</b>	<b>Female</b>	<b>Hispanic</b>
<b>Compliance</b>	<b>Female</b>	<b>Asian</b>
<b>Administration</b>	<b>Female</b>	<b>White</b>
<b>Paratransit</b>	<b>Female</b>	<b>Black</b>
Transportation Alternate	Male	Black
Transportation Alternate	Male	White
Maintenance Alternate	Female	White
Admin Alternate	Male	White
Admin Alternate	Male	White

The EOAC shall meet quarterly at RIPTA Headquarters, located at 705 Elmwood Avenue, Providence, RI 02907 with the annual meeting schedule set at the last meeting of the previous calendar year. Meeting minutes shall be kept by the Secretary or by a designated proxy in the absence of the Secretary.

## SUBRECIPIENT COMPLIANCE

Historically, RIPTA has not utilized subrecipients on federally-funded projects. During the 2016-2018 period RIPTA had one subrecipient, the Rhode Island Department of Transportation (RIDOT). As a direct recipient of FTA funds, RIDOT submits its own Title VI plan directly to the FTA. Final expenditure on this subrecipient contract was made on June 20, 2016. Currently, we have one subrecipient, The Quonset Development Corporation (QDC).

RIPTA is committed to ensuring that our subrecipients are in compliance with FTA Title VI regulations and meet the requirements of FTA Circular 4702.1B. To this end, RIPTA intends to formalize Title VI compliance training and monitoring procedures for all of our subrecipients. RIPTA shall verify compliance by requiring subrecipients to submit their Title VI plans at a frequency set by RIPTA.

RIPTA shall provide continuous assistance and guidance to our subrecipients throughout the life of the associated project. We shall provide sample Title VI documents and assist in the organization of their Title VI plan. Each Title VI plan submitted by a Subrecipient will undergo a comprehensive compliance review. RIPTA will work with the Subrecipient to cure any defects in the plan. The approved Title VI plan will be filed electronically in RIPTA's Compliance Department.

# CHAPTER THREE

## SERVICE STANDARDS AND POLICIES

### SYSTEMWIDE SERVICE STANDARDS

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

### VEHICLE LOADING

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

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

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

TABLE 1 | AVERAGE VEHICLE LOADING MAXIMUMS

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS	FLEX
<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; and
- Where the desired frequency of service causes round trip recovery time to exceed 20% of the total round trip vehicle time, leading to inefficient service.

## ROUTES SHOULD OPERATE ALONG A DIRECT PATH

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

### SERVICE FACTORS WITHIN RIPTA’S CONTROL

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

### ENVIRONMENTAL FACTORS BEYOND RIPTA’S CONTROL

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

## ROUTE DEVIATIONS SHOULD BE MINIMIZED

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

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

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

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

## ON-TIME PERFORMANCE

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

## SERVICE COVERAGE

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

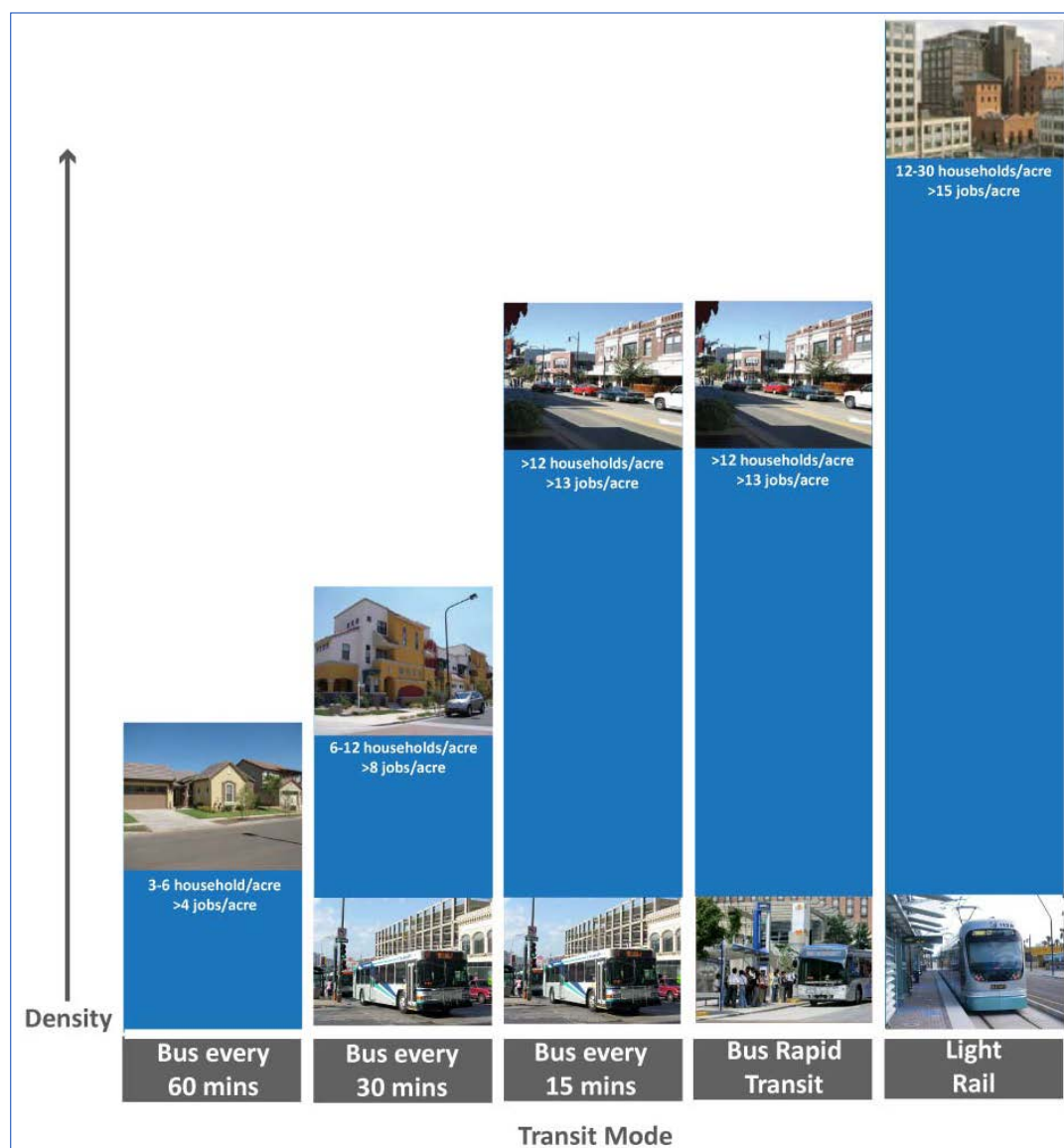
Population and employment densities are one of the strongest indicators of potential transit demand. Figure 1 on the following page provides a general guideline for where different levels of transit service may be warranted. Once densities begin to exceed three to six households per acre or four jobs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

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

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



**FIGURE 1 | TRANSIT SUPPORTIVE POPULATION AND EMPLOYMENT DENSITIES**



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

### STOPS SHOULD BE SPACED APPROPRIATELY

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

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

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

**TABLE 4 | BUS STOP SPACING GUIDELINES**

	RAPID BUS	KEY CORRIDOR	URBAN RADIAL	NON-URBAN/ SUBURBAN/ CROSSTOWN	REGIONAL	EXPRESS/ COMMUTER	FLEX
<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 system-wide service policies for vehicle assignment and distribution of transit amenities. Policies differ from standards in that policies are not necessarily based on a quantitative threshold.

### DISTRIBUTION OF TRANSIT AMENITIES

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

#### a. Seating

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

#### b. Bus Shelters

A major concern of transit riders, especially regarding inclement weather, is the amount of time spent on the street exposed to the elements. The

abundance of cold and windy conditions is of particular concern in Rhode Island.

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

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

**c. Provision of Information**

Timetables are provided at all transit hubs in the RIPTA system. RIPTA does not provide timetables at other bus stops. RIPTA's Customer Service Department will mail schedules to passengers upon request.

**d. Escalators**

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

**e. Elevators**

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

**f. Waste Receptacles**

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

## VEHICLE ASSIGNMENT

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

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

# CHAPTER FOUR

## 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*

Changes to bus service typically encompass one or more of the following four main components: 1) frequency, 2) span of service, 3) service coverage, and 4) travel time. Frequency is the time interval between two vehicles traveling in the same direction on the same route. Span of service is the number of hours each day that a route operates expressed as the time of the first trip to the time of the last trip. Service coverage is the geographic measure of the area within walking distance of a bus stop. Travel time is the time it takes to travel between two points on a route. These four metrics together have a major influence on transit accessibility, convenience and, ultimately, ridership.

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:

- a. Within an 18-month period, a cumulative increase or decrease of more than 25% in the average peak frequency, weekday, Saturday, or Sunday.

Example: A route has proposed weekday peak frequency reduction from every 15 minutes to every 18 minutes.

Formula:  $[(\text{New Frequency} - \text{Old Frequency}) / \text{Old Frequency}] * 100$

Result:  $[(18 - 15) / 15] * 100 = -20\%$  This is not a major service change.

- b. Within an 18-month period, a cumulative increase or decrease of more than 25% in the average off-peak frequency, weekday, Saturday, or Sunday.

Example: A route has proposed Saturday frequency increase from every 25 minutes to every 20 minutes.

Formula:  $[(\text{New Frequency} - \text{Old Frequency}) / \text{Old Frequency}] * 100$

Result:  $[(20 - 25) / 25] * 100 = -20\%$  This is not a major service change.

NOTE: Improved frequency results in a negative number, but we are looking at the absolute value.

- c. Within an 18-month period, a cumulative increase or decrease of more than 10% in the span of service, weekday, Saturday, or Sunday.

Example: A route has proposed span reduction from 18 hours to 16 hours.

Formula:  $[(\text{New Span} - \text{Old Span}) / \text{Old Span}] * 100$

Result:  $[(16 - 18) / 18] * 100 = -11\%$  This is a major service change.

- d. Removal of a bus stop that results in a walk of over 1/2-mile to the nearest bus stop from the former stop.
- e. Rerouting or route extensions that result in a walk of over 1/2-mile to the nearest bus stop from the former stop.
- f. Route elimination.
- g. Establishment of a new route.

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 erosion of service over time – for instance on a low-performing route – it was decided that the cumulative impact of changes should be tracked over an 18-month period to ensure that a series of relatively small changes do not result in major changes over time.

A 10% threshold was selected for service span changes, and 25% for frequency changes based on a review of RIPTA routes in terms of span, frequency, and the number of vehicles being operated on each route. These thresholds allow 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 thresholds protect 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. Discontinuation of a contracted service.
5. Forces of nature, such as, but not limited to, 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, that change is evaluated to determine if the change is positive or adverse in nature. If a change is determined to be adverse, RIPTA will then complete an equity analysis.

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 (calculations for the changes below are the same as calculations for identifying a major service change):

- a. Span of service decrease of more than 10%, weekday, Saturday, or Sunday.
- b. A 25% decrease in the average peak frequency on a route, weekday, Saturday, or Sunday.
- c. A 25% decrease in the average off-peak frequency on a route, weekday, Saturday, or Sunday.
- d. Removal of a bus stop that results in a walk of over 1/2-mile to the nearest bus stop from the former stop.
- e. Rerouting or route extensions that result in a walk of over 1/2-mile to the nearest bus stop from the former stop.
- f. 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.

### *Disparate Impact Policy*

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

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

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

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

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

#### *Disproportionate Burden Policy*

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

RIPTA defines a disproportionate burden as occurring when more than 79.2% of the population bearing adverse effects belongs to low-income groups. This policy is designed to reflect populations that meaningfully exceed RIPTA's system-wide average of 69.2% low-income individuals, based on 2016 rider survey data.

LOW-INCOME ROUTES	
Routes	Low-Income Percent
29	80%
31	84%
76	84%
87	81%
203	79%

#### **Finding of Disparate Impact or Disproportionate Burden**

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

To keep affected populations and the general public informed of and engaged in this process, RIPTA will provide public notice of any finding of disparate impact or disproportionate burden, and will solicit suggestions and feedback regarding (1) modifications and alternatives under



consideration; and (2) measures that may be implemented to mitigate against the negative impacts for the changes.

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

## Implementing Service Changes

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

## FARE CHANGE EQUITY ANALYSIS

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

### Determining When an Equity Analysis is Needed

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

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

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

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

## Equity Analysis

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

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

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

### *Alternatives Analysis:*

Alternative fare payment methods or fare media available for individuals affected by the proposed changes will be presented and analyzed. This analysis will compare the fares paid by the proposed changes with fares that would be paid through available alternatives, and will provide the location of fare media distribution points relative to that of impacted populations.

## Finding of Disparate Impact

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

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

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

shows that the proposed changes are the least discriminatory alternative. RIPTA must adopt the least discriminatory alternative available.

## Implementing Fare Changes

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

## PUBLIC INVOLVEMENT

RIPTA initially developed the policies detailed in this chapter in 2015 with the participation of members of Rhode Island's minority, low income, and LEP communities. The thresholds and data sets were prepared by RIPTA technical staff, then thoroughly vetted through a public process that included a formal public comment period and a Community Leadership Group Workshop.

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

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

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

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

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

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

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

The group was informed that under Title VI, transit authorities were now required to have "disparate impact" and "disproportionate burden" policies developed before initiating major service changes or fare increases. Disparate impact and disproportionate burden were defined. The draft policies established thresholds and data sets to determine when impacts of major service changes and fare changes disproportionately and adversely affect minority and low income populations. RIPTA was seeking community feedback prior to the thresholds and policies being adopted. A number of questions were addressed including how organizations representing minority and low-income populations could be engaged in the ongoing SAFE analyses so as to better understand impacts. Subsequent to the workshop, RIPTA received additional feedback from Dorcas International and the Cambodian Society of Rhode Island. RIPTA's Board of Directors adopted the SAFE policies and procedures at its June 2016 meeting.

In 2020, in conjunction with the updating of its overall Title VI program, RIPTA proposed a number of clarifications to its SAFE policies and procedures for public discussion. The goal of these updates was to be more specific about when service changes rise to the level of requiring a Title VI review. In the current updated policy, RIPTA is now spelling out, and giving examples, of the formulas it uses to calculate when a service change is 'major,' and therefore subject to a Title VI review.

In the section on determining whether a service change might create a disproportionate burden on low-income residents, RIPTA has added a table listing routes in our system that have high percentage of low-income riders. A similar table was previously provided in the section pertaining minority populations, which continues to be included as well.

Two public meetings were held on December 9th in which eight individuals representing five community-based organizations participated. Outreach for these meetings included the Community Leadership Group members noted above, plus the organizations invited to participate in RIPTA's External LEP Survey noted in Chapter 1. The proposed updated SAFE

language was also posted on the RIPTA website for public comment from December 18<sup>th</sup> through January 13<sup>th</sup>. Based on input received at the December 9<sup>th</sup> meetings, the updated language was slightly modified. No additional input was received during the public comment period.

In development of this document, RIPTA proposed the walk radius to determine a major service change be reduced from 1/2-mile to 1/4-mile when a bus stop is removed. Additionally, RIPTA proposed the definition for major service change be redefined from a 1/2-mile walk to a 5-minute walk when a bus route is rerouted. RIPTA received comment from the RI Department of Transportation on January 19, 2021. Based on input received from RIDOT, the existing Title VI Language was retained. This includes the definition of a major service change defining the acceptable walk distance for a removed bus stop at 1/2-mile, and defining the impact of the rerouting of a bus route to a 1/2-mile walk radius.

RIPTA is committed to maintaining an ongoing relationship with the LEP community, including sharing SAFE analyses of any major service or fare changes should such changes arise.

## SERVICE AND FARE CHANGE EQUITY ANALYSES

See Appendix, Exhibit G.

# CHAPTER FIVE

## SERVICE MONITORING

### REQUIREMENT TO MONITOR TRANSIT SERVICE

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

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

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

Route	Minority/Non-Minority	Route Type
R-Line	Minority Route	Rapid
6 Prairie Ave / RW Zoo	Minority Route	Urban Radial
17 Dyer / Pocasset	Minority Route	Urban Radial
18 Union Avenue	Minority Route	Urban Radial
22 Pontiac Avenue	Non-Minority Route	Urban Radial
29 Coweset / Kent County	Non-Minority	Suburban & Crosstown
34 East Providence	Minority	Suburban & Crosstown
51 Charles / Twin River / CCRI	Non-Minority	Urban Radial
54 Lincoln / Woonsocket	Non-Minority	Regional
65X Wakefield	Non-Minority	Express

## Disparate Impacts

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

## VEHICLE LOAD

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

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

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

**Table 6-2 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%

Table 6-3 presents the vehicle load performance of all the routes evaluated. All routes meet the vehicle load guidelines.

**Table 6-3 Vehicle Load Performance**

Route	Minority /	Average	Average
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	Non-Minority	Max Load - Peak	Max Load - Off-Peak
<b>R-Line</b>	Minority	74.9%	54.4%
<b>6 Prairie Ave / RW Zoo</b>	Minority	41.7%	25.8%
<b>17 Dyer / Pocasset</b>	Minority	49.1%	43.6%
<b>18 Union Avenue</b>	Minority	39.6%	33.5%
<b>22 Pontiac Avenue</b>	Non-Minority	54.1%	38.9%
<b>29 Coweset / Kent County</b>	Non-Minority	29.8%	35.1%
<b>34 East Providence</b>	Minority	45.4%	32.3%
<b>51 Charles / Twin River / CCRI</b>	Non-Minority	58.8%	46.1%
<b>54 Lincoln / Woonsocket</b>	Non-Minority	58.3%	49.3%
<b>65X Wakefield</b>	Non-Minority	31.3%	34.1%

## VEHICLE HEADWAY

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

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

In general, frequencies are established to provide enough vehicles past the maximum load point(s) on a route to accommodate the passenger volume and stay within recommended loading standards. Minimum service frequency guidelines are presented in Table 6-4. 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 6-4 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	20	30	60	60	3 trips	n/a
Midday	10	20	60	60	60	—	n/a
PM Peak	10	20	30	60	60	3 trips	n/a
Night	30	30	60	60	120	—	n/a
<b>Saturdays</b>							
All Day	15	30	60	60	—	—	n/a
<b>Sundays</b>							
All Day	15	30	60	60	—	—	n/a

Table 6-5 presents the vehicle headway schedules of all the routes evaluated for weekday, Saturday and Sunday.

**Table 6-5. Vehicle Headway**

Route	Weekday Headway			Saturday Headway	Sunday Headway
	Peak	Off-Peak	Night		
<b>R-Line</b>	10	10	20	15	15
<b>6 Prairie Ave / RW Zoo</b>	60	30	-	60	60
<b>17 Dyer / Pocasset</b>	30	30	60	50	50
<b>18 Union Avenue</b>	30	60	60	60	---
<b>22 Pontiac Avenue</b>	30	30	45	45	45
<b>29 Coweset / Kent County</b>	90	90	---	90	---
<b>34 East Providence</b>	60	60	60	45	60
<b>51 Charles / Twin River / CCRI</b>	30	30	40	30	60
<b>54 Lincoln / Woonsocket</b>	30	30	40	50	60
<b>65X Wakefield</b>	5-6 Trips	---	---	---	---

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

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

Route 6 does not meet peak frequency guidelines due to one of the primary route generators, the Roger Williams Zoo, not opening until 10:00am and closing at 4:00pm. Frequency increases

to every 30 minutes once the zoo opens. Route 6 is also geographically close to the R-Line, about a quarter mile, and they overlap in some areas, resulting in a very high level of service in this part of the city of Providence.

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

Route 29 currently does not meet any of the frequency guidelines. Even with very low frequency, this route has steadily been gaining ridership during recent years. RIPTA has been developing plans to rebuild the bus service in this area of the state, which would include restructuring and improving frequency on route 29. The planning process slowed down due to the Covid-19 pandemic, but the Planning Department is monitoring ridership trends and continues to refine the plans, and hopes to begin engaging the public soon to solicit feedback and suggestions on the service redesign.

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 78%. RIPTA's Service Guidelines define a trip as being on time if it is one minute early and up to 5 minutes late. Table 6-6 below shows the on-time performance for the routes in this evaluation.

**Table 6-6. On-Time Performance**

Route	Minority / Non-Minority	Observed Performance Nov 2019*
<b>R-Line</b>	Minority	80%
<b>6 Prairie Ave / RW Zoo</b>	Minority	80%
<b>17 Dyer / Pocasset</b>	Minority	70%
<b>18 Union Avenue</b>	Minority	79%
<b>22 Pontiac Avenue</b>	Non-Minority	77%
<b>29 Coweset / Kent County</b>	Non-Minority	79%
<b>34 East Providence</b>	Minority	81%
<b>51 Charles / Twin River / CCRI</b>	Non-Minority	74%
<b>54 Lincoln / Woonsocket</b>	Non-Minority	63%
<b>65X Wakefield</b>	Non-Minority	58%

\*NOTE: RIPTA chose to use data from prior to Covid-19 pandemic for a more accurate depiction of conditions.

As shown in the table above, route 17 is the one minority route that is not meeting the on-time performance standard, and routes 22, 51, 54, and 65X are non-minority routes that do not meet the standard. The minority routes average 78% on time, while non-minority routes average 70% on time. No disparate impact is found.

Route 17, and others that operate through the west end of Providence, have experienced on time performance problems primarily due to a major bridge and road reconstruction project by the Rhode Island Department of Transportation. The reconstruction of the interchange of routes 6 and 10 is a five-year project with major impacts to traffic in the area and once complete should result in significant traffic flow improvements. RIPTA Planning, Supervision, and Transportation departments are working together to monitor conditions and make service adjustments where possible to keep the system reliable.

Routes 51 and 54 were reconfigured in January 2020 and extended to Rhode Island Hospital as part of the new Downtown Transit Connector service. Bus lanes have recently opened on this corridor and should help improve performance.

## DISTRIBUTION OF TRANSIT AMENITIES

### g. Seating

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

### h. Bus Shelters

The placement of shelters is based on the number of passenger boardings at a specific stop. All stops with 100 or more passenger boardings, or which serve concentrations of elderly or handicapped residents, are prioritized for shelters.

As shown in Table 6-7, 42 of 316 (13.3%) of the bus stops on minority routes have shelters, and 69 of 474 (14.6%) of stops of the selected non-minority routes have shelters. The ratio of minority to non-minority shelters is 0.91, which is above the disparate impact threshold of 0.80. No disparate impact is found.

**Table 6-7 Shelter Placement**

Route Classification	Number of Bus Stops	Number of Stops with Shelters	% of Stops with Shelters
Minority	316	42	13.3%
Non-minority	474	69	14.6%

**i. Provision of Information**

- a. *Printed Signs, System Maps, & Schedules.* Timetables, and system maps are provided at transit hubs in the RIPTA system. RIPTA does not provide printed signs, system maps or timetables at other bus stops.
- b. *Digital Signs.* Real time signage is provided at transit hubs in the RIPTA system. Most recently, digital signage was installed as part of the Downtown Transit Connector (DTC) project, an FTA funded project. The DTC is a high frequency corridor comprised of several routes designed to connect major downtown destinations. While real time information signs were installed on the corridor, RIPTA does not have an ongoing real time signage program.

**j. Escalators**

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

**k. Elevators**

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

**l. Waste Receptacles**

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

## VEHICLE ASSIGNMENT

Vehicle assignment at RIPTA is fairly simple because there is very little variation in the fleet. There is a small group of the buses purchased in 2013 that are branded and 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 assigned to the remaining routes. Table 6-8 is the current composition of the RIPTA fleet.

**Table 6-8 RIPTA Fleet**

Fleet	Number in Fleet	% of Fleet	Vehicle Age
2005	6	3%	15
2009	24	10%	11
2010 Trolley	10	4%	10
2010 Hybrid	52	23%	10
2010 35'	10	4%	10

<b>2013</b>	50	22%	7
<b>2016</b>	42	18%	4
<b>2018*</b>	3	1%	2
<b>2019</b>	33	14%	1
<b>Total</b>	230	100%	

\*Leased electric buses.

To assess bus vehicle age assigned to minority classified routes and nonminority classified routes, RIPTA compared the average age of buses assigned to runs on each route. Table 6-9 shows the average age of buses operating on each route. The average age for buses operating on minority routes is 7.1 years. The average age for buses operating on non-minority routes is 6.2 years. The ratio of non-minority to minority average vehicle age is 0.87, which is above the disparate impact threshold of 0.80. No disparate impact is found.

**Table 6-9 Bus Vehicle Age\***

Vehicle Year and Percent Assigned to Route																Weighted Average Age
Route	Vehicle Year:	2005	%	2009	%	2010	%	2013	%	2016	%	2018*	%	2019	%	Age
6 Prairie Ave/ RW Zoo			0%		0%	51	100%		0%		0%		0%		0%	10.0
11 R-Line			0%	1	0%	10	2%	358	86%	14	3%	17	4%	14	3%	6.6
17 Dyer/Pocasset	13	6%		2	1%	79	37%	46	22%	43	20%		0%	30	14%	7.2
18 Union Avenue	10	11%			0%	26	30%	14	16%	24	27%		0%	14	16%	7.0
22 Pontiac Avenue			0%		0%	35	31%	32	28%	37	32%		0%	10	9%	6.4
29 Cowesett/Kent County	4	4%			0%	16	16%	14	14%	44	45%		0%	20	20%	5.2
34 East Providence			0%		0%		0%	3	75%	1	25%		0%		0%	6.3
51 Charles/Twin River/CCRI			0%		0%	27	28%	43	44%	17	18%		0%	10	10%	6.7
54 Lincoln/ Woonsocket			0%		0%		0%	52	41%	53	42%		0%	22	17%	4.7
65X Wakefield	16	16%	45	44%	1	1%		0%	12	12%		0%	29	28%	8.0	

\*Electric Buses

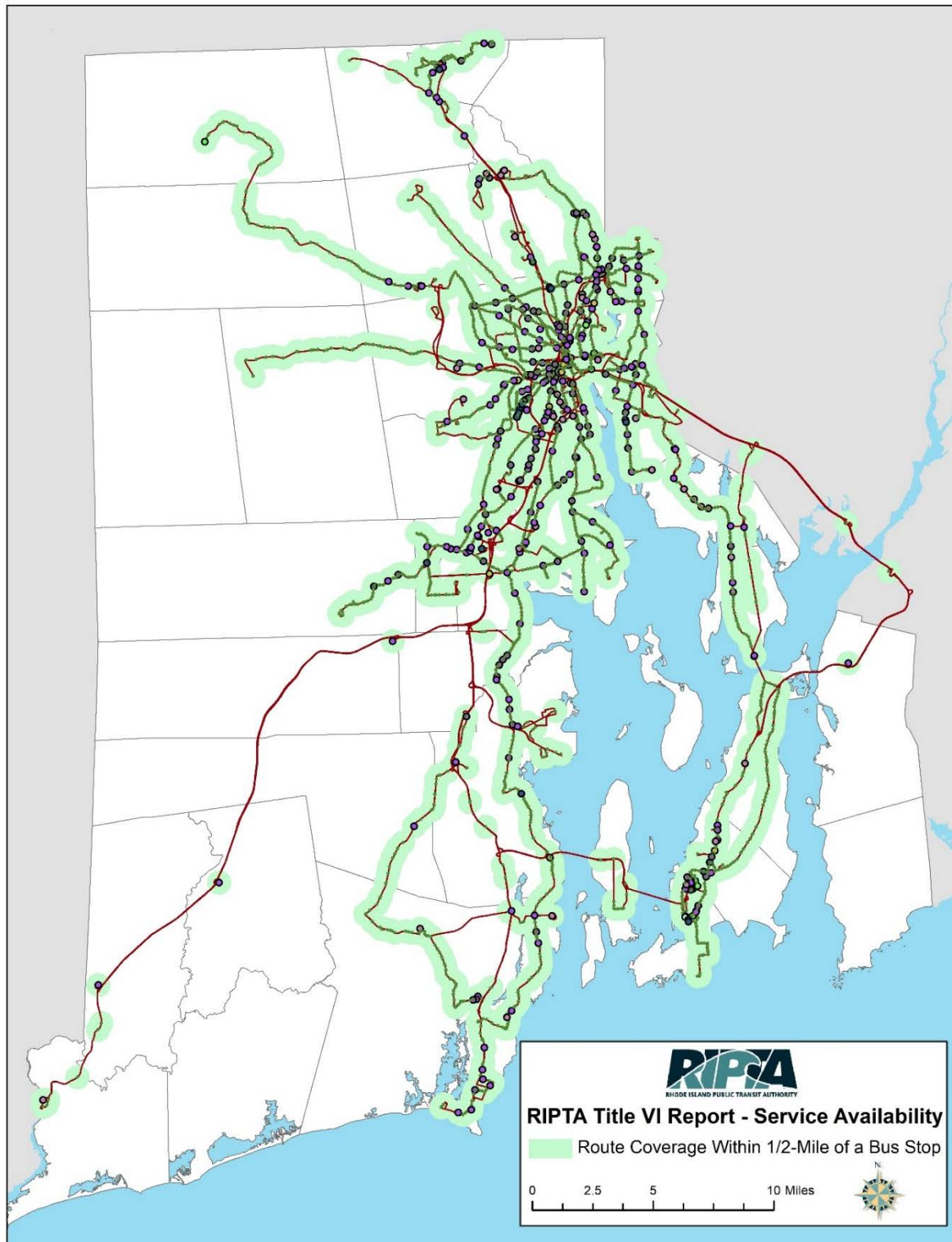
\*Vehicle assignments for the month of September 2020.

## SERVICE AVAILABILITY

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

Areas with higher population densities need more transit service than sparsely populated areas. Rhode Island comprises 1,024 square miles of land, and 242 square miles, or 23.6%, are within a quarter mile of a RIPTA bus stop. While this may seem like a low percentage of coverage, the

state is densely settled and the majority of the state's population is close to a bus stop. The most recent data shows that 772,325 people, or 73.8% of Rhode Island's population, live within a half mile of a RIPTA bus. The following map depicts RIPTA's current service coverage area.





## **HOW TO REACH US**

401 784 9500  
705 ELMWOOD AVENUE  
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)





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

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

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

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

WHEREAS, RIPTA's 2021-2024 Title VI Program must be submitted to the FTA;

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

WHEREAS, RIPTA staff has prepared and approved RIPTA's 2021-2024 Title VI Program, and submitted it for approval by the Board of Directors as an agenda item at the Board's March 17, 2021 meeting;

WHEREAS, RIPTA's Board of Directors wishes to approve RIPTA's 2021-2024 Title VI Program and direct its submission to the FTA;

WHEREAS, RIPTA's Board of Directors wishes to specifically acknowledge the Board's consideration, awareness and approval of the following elements of RIPTA's 2021-2024 Program:

- Service Standards
- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy
- Service and Fare Equity Analysis
- Service Monitoring Results

NOW, THEREFORE, in light of the foregoing, it is hereby RESOLVED by the Board of Directors of the Rhode Island Public Transit Authority to approve submission of RIPTA's 2021-2024 Title VI Program to the FTA.

On behalf of the Rhode Island Public Transit Authority, the Chairman of the Board of Directors, has executed this Resolution as of the 17<sup>th</sup> day of March, 2021.

  
Normand Benoit, Board Chair





**TITLE VI  
INFORMATION**

### **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.



**www.RIPTA.com • 401-781-9400**



**TITLE VI  
INFORMATION**

# **Protecting Your Rights**



**RHODE ISLAND PUBLIC TRANSIT AUTHORITY**



## 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 Rhode Island Public Transit Authority (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 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:**  
Civil Rights Officer  
Rhode Island Public Transit Authority  
705 Elmwood Avenue  
Providence, RI 02907
- **Call Customer Service at (401) 781-9400.**  
RIPTA 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](http://RIPTA.com)** and download a copy of the Title VI Complaint Form to fill out and mail to the above address.



INFORMACION  
SOBRE EL TITULO VI



### ¡Su opinión nos interesa!

RIPTA tiene el compromiso de brindar servicios de transporte seguro, eficiente y de calidad a todas las comunidades que usan nuestro servicio.

Si tiene algún comentario o sugerencia sobre cómo podemos mejorar nuestro compromiso de erradicar la discriminación en nuestros servicios, o cómo podemos asistir mejor a nuestros usuarios que no manejan perfectamente el inglés, nos gustaría conocer su opinión.



RHODE ISLAND PUBLIC TRANSIT AUTHORITY

[www.RIPTA.com](http://www.RIPTA.com) • 401-781-9400

INFORMACION  
SOBRE EL TITULO VI



# Protegiendo Sus Derechos



RHODE ISLAND PUBLIC TRANSIT AUTHORITY





## ¿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.

RIPTA tiene también una política de tolerancia cero que prohíbe cualquier forma de discriminación ilegal.

## ¿Qué servicios están disponibles para los usuarios que no manejan perfectamente el inglés?

Según el Título VI, los usuarios que no manejan perfectamente el inglés tienen derecho a ser asistidos para tener acceso a información crítica de RIPTA. Nuestros empleados de servicio al cliente están a disposición de los usuarios que no manejan el inglés.

## ¿Qué debe hacer si quiere presentar 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. Cuando presente una queja, por favor incluya los datos personales de contacto así como detalles del hecho, incluyendo qué sucedió, dónde, cuándo, y los nombres, domicilios, números de teléfono y direcciones de correo electrónico de los testigos.

Usted puede:

- **Envíar una carta a:**  
Civil Rights Officer  
Rhode Island Public Transit Authority  
705 Elmwood Avenue  
Providence, RI 02907
- **Llamar a la oficina de atención al cliente de RIPTA, (401) 781-9400.** La oficina atiende de lunes a viernes entre las 8:30 AM y las 4:30 PM.
- **Visite nuestra página Web: [www.RIPTA.com](http://www.RIPTA.com)** y descargar una copia del formulario para querellas por el Título VI para llenar y enviar a la dirección de arriba.





## 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: [jwilliford@ripta.com](mailto:jwilliford@ripta.com) OR mail to:

705 Elmwood Avenue, Providence, RI 02907, ATTN: Legal Compliance Counsel.

Your Name:	Phone:	Alt. Phone:
StreetAddress:	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

## RIPTA Title VI Complaint Form

Please describe the alleged discrimination incident (continued)

[illegible]

Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No

If so, list agency/agencies and contact information below:

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_

Street Address, City, State & Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_

Street Address, City, State & Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature

Date

Print or Type Name of Complainant

Date Received: \_\_\_\_\_

Received By: \_\_\_\_\_



## Rhode Island Public Transit Authority

### Título VI Formulario de Queja

RIPTA está cometido a asegurar que las personas no sean excluidas de participación ni negado a los beneficios de sus servicios por raza, el color de la piel, ni origen nacional, como 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 su queja. Si requiere cualquier ayuda para completar esta forma, por favor contacte a la Oficina de Servicios al Cliente, llamando (401) 781-9400. La forma completada debe ser devuelta a RIPTA a través de correo electrónico: [jwilliford@ripta.com](mailto:jwilliford@ripta.com) o enviada a: 705 Elmwood Avenue, Providence, RI 02907, A LA ATENCIÓN DE: Legal Compliance Counsel.

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

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

Fecha de incidente: \_\_\_\_\_

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

Por favor describa el presunto incidente de discriminación. Proporcione nombres y títulos de todos los empleados de RIPTA implicados, si es disponible. Por favor proporcione los mas detalles posible: número de ruta, la fecha y el tiempo de día, número de autobús, los nombres e información de contacto para testigos. Explique lo que sucedió y quien usted cree fue responsable. Por favor utilice el dorso de esta forma si el espacio adicional es requerido.

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Rellene el dorso de formulario

## RIPTA Título VI Formulario de Queja

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

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

¿Ha archivado una queja con cualquier otra agencia federal, estatal o local? (Trace un círculo alrededor de uno)    Sí / No

Si eso es el caso, haga una lista abajo de la agencia/agencias e información de contacto.

Agencia: \_\_\_\_\_ Nombre de Contacto: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

Agency: \_\_\_\_\_ Nombre de Contacto: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Afirmo que he leído la carga previamente mencionada y que es verdad según entiendo, información y creencia.

Firma de la persona que hace la queja

Fecha

Imprima o escriba el nombre de la Persona que hace la queja

La fecha Recibió: \_\_\_\_\_

Recibido Por: \_\_\_\_\_



# 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 দোভাষীর সঙ্গে 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	ທ່ານປາກພາສາລາວຫລືບໍ່? ພວກເຮົາຈະໂທລະສັບ ເພື່ອຊອກຫາພາສາໃຫ້.
<b>Cambodian</b> ខ្មែរ	តើអ្នកនិយាយភាសាខ្មែរ ឬទេ? យើងនឹងទូរស័ព្ទទៅប្រាប់អ្នកបន្ថែម	<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 تسی پنجابی بولدے او؟ اسی کے مترجم نوں ٹیلی فون کراں 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 entrèprèt nan telefòn pou edu w.	<b>Somali</b> Soomaali	Af Soomaaliga ma ku hadashaa? Waxaan telefoon u diri 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 biliyormusunuz? Biliyorsanız bir tercuman 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 کسی مترجم کو ٹیلی فون 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 phải không? Chúng tôi sẽ gọi cho một thông dịch viên.





## 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.











## Language Code List

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

264	Acholi (Sudan - Uganda)	273	Edo	121	Ilonggo	291	Marshallese	089	Sinhala
265	Afghan	274	Eritrean	050	Indonesian	355	Maya	064	Slovak
224	Afrikaans	349	Eskimo	018	Inupiaq	356	Mende	301	Slovakian
016	Akan	326	Esperant	059	Italian	045	Mien	134	Slovenian
120	Akalan	077	Estonian	235	Jakartanese	373	Mirpuri	142	Somali
070	Albanian	275	Ethiopian	357	Jamican English Creole (Patois)	292	Mixteco	375	Sorani
027	Amharic (Ethiopia)	321	Ewe	040	Japanese	389	Mola/Mossi	060	Spanish
323	Apache	327	Fang	236	Javanese	340	Moldovan	258	Suchown
090	Arabic	074	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	Kanjobal	381	Moroccan Arabic	053	Swedish
109	Azerbaijani	052	Finnish	289	Kannada	293	Nahuatl	377	Sylheti
343	Bahasa/Brunei	227	Flemish	369	Karen	248	Nanjing	108	Tadzhik
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 Pidgin	303	Telegu
225	Belorussian	217	French Creole	239	Kikuyu	250	Nipponese	359	Temne
324	Bemba	278	Frisian	366	Kinya/Rwanda	054	Norwegian	047	Thai
084	Bengali	032	Fukinese	240	Kirghiz	294	Nuer (Sudan)	105	Tibetan
269	Berber	014	Fulani	338	Kirundi	251	Oromo (Ethiopia)	028	Tigrigna (Eritrea)
085	Bhojpuri	229	Fuzhou	376	Kongo	386	Ouatchi	307	Tohono O'Odham
118	Bicol	230	Ga	041	Korean	296	Paluan	305	Toisan
382	Borana	231	Gaddang	320	Krahn	116	Pampang	036	Toishanese
263	Bosnian	232	Gaelic	241	Krio	114	Pangashian	128	Tongan
270	Brazil-Portuguese	228	Gallinya	364	Kru/Krumen	252	Pao-An	334	Triqui
069	Bulgarian	281	Gana	370	Kunama	253	Papiamento	342	Trukese/Chuukese
042	Burmese	282	Ganda (Uganda)	140	Kurdish	110	Pashto (Afghanistan)	259	Tshiluba
325	Cakchiquel	388	Garri	372	Kurmanji	297	Persian	112	Turkish
048	Cambodian	216	Georgian	353	Lahu	254	Pidgin English	095	Tw
031	Cantonese	057	German	143	Lakota	331	Pohnpeian	076	Ukrainian
013	Cape Verdean	322	Grebo	367	Lanvhou	062	Polish	079	Urdu
132	Catalan	071	Greek	043	Lao	073	Polynesian	336	Uzbek
122	Cebuano	125	Guamanian	204	Latvian	061	Portuguese	049	Vietnamese
138	Chaldean	350	Guarani	024	Lingala	141	Portuguese Creole	214	Visayan
038	Chao Chow	083	Gujarati	075	Lithuanian	358	Pothohari	117	Waray-Waray
226	Chavacano	284	Gwa	313	Loma	080	Punjabi	020	Wolof
344	Cherokee	129	Haitian Creole	242	Luganda	332	Purepecha/Tarasco	061	Wu
025	Chichewa	039	Hakka	329	Luo	145	Quechua	360	Xhosa
030	Chinese	022	Hausa	243	Luxembourgais	317	Quiche	361	Yapese
378	Chinese	285	Hawaii Creole	315	Maay Somali	260	Quxinese	387	Yemeni Arabic
346	Chui Chow	106	Hebrew	068	Macedonian	298	Romani	135	Yiddish
034	Chungshan	082	Hindi	087	Magahi	078	Romanian	021	Yoruba
316	Chuukese	351	Hindko	086	Maithili	126	Samoan	362	Yucateco
348	Creek	319	Hindustani	244	Malagasy	337	Sarahuleh/Soninke	262	Yugoslavian
347	Creek	046	Hmong	051	Malay	255	Senegalese	146	Yupik
341	Crioulo	286	Hokkien	088	Malayalam	148	Serbian	115	Zambal
067	Croatian	310	Hopi	354	Malinke	299	Serbo-Croatian	380	Zande
063	Czech	233	Hubel	245	Maltese	037	Shanghainese	029	Zapoteco
271	Dakota	352	Huizhou	318	Mam	333	Sichuan/Szechuan	335	Zarma
055	Danish	147	Hunanese	035	Mandarin	256	Sicilian	309	Zulu
111	Dari (Afghanistan)	065	Hungarian	015	Mandingo	257	Sindi		
131	Dinka (Sudan)	234	Ibanag	246	Mandinka				
056	Dutch	218	Ibo	247	Mankon				
272	Ebon	133	Icelandic	205	Marathai				
		113	Ilocano						

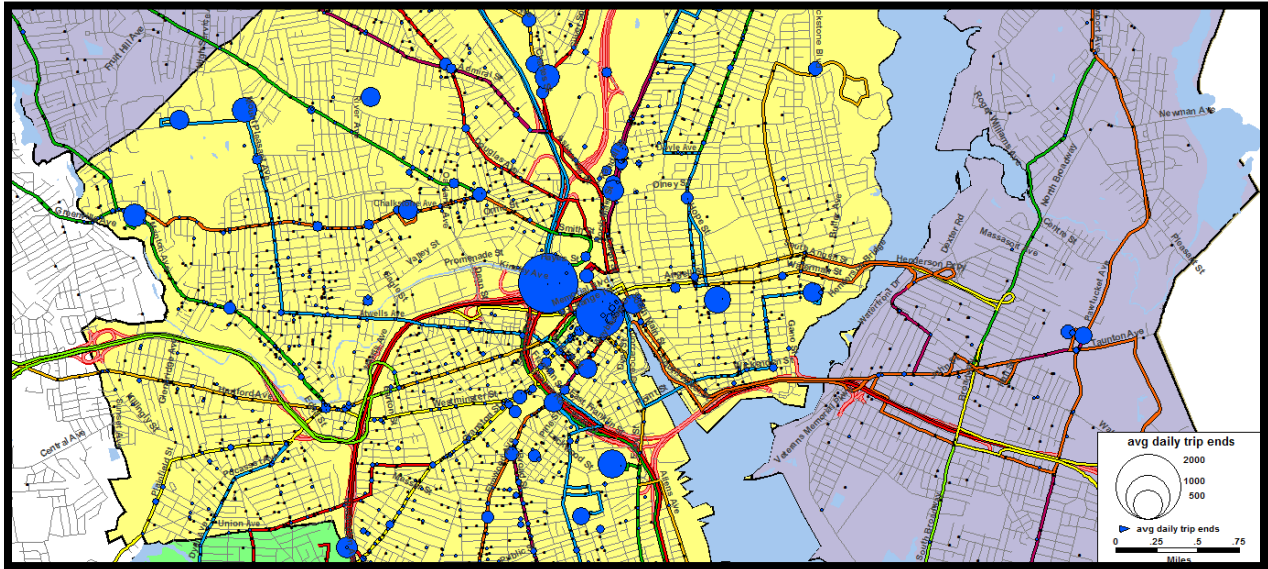
Use this chart to phonetically say **Please Hold** or **One Moment, Please** when you need to place a Limited English Proficient caller on hold to access an interpreter.

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-doold
<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 bontèk	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

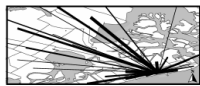
	Portuguese	Se pretender receber assistência em português, telefone, por favor, para o Serviço de Apoio ao Cliente através do 401-784-9500, extensão 104.
	French	Si vous avez besoin d' aide en français, s'il vous plait appelez le service à la clientèle au 401-784-9500, poste 104.
	Mandarin	如果你需要接受 汉语 的帮助，请拨打客服电话 401-784-9500，分机 104。
	Khmer	ប្រសិនបើអ្នកចង់ទទួលបានជំនួយជា (ខ្មែរ), សូមហៅមកសេវាកម្មអ្នកប្រើអភិវឌ្ឍនភាព យើ.លេខ <u>401-784-9500</u> , លេខបន្ថែម 104។
	Italian	Se desideri ricevere assistenza in italiano, contatta gentilmente il nostro servizio di Assistenza Clienti al numero 401-784-9500, int. 104.
	Laotian	ຖ້າ ທ່ານຢາກໄດ້ ການຊ່ວຍເຫຼືອ ອັນ ນຳ ພາລາວ, ກະລຸນາໂທຫາພາກສ່ວນ ລັ ການວຸ ກຄ ທີ່ 401-784-9500, ຕໍາ 104.
	Arabic	إذا كنت ترغب في الحصول على المساعدة في (اللغة العربية)، يرجى الاتصال بخدمة العملاء على 104. داخلي 9500-784-401.
	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.

Rhode Island Public Transit Authority

# Rider Survey 2016



Final report  
March 10, 2017



**WARNER**  
**TRANSPORTATION CONSULTING, INC.**

177 Riverside Drive  
Northampton, MA 01062  
413 585-5026



## Section 1: Introduction

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

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

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

Section 2: methodology;

Section 3: characteristics of the riders and trips;

Section 4: customer satisfaction ratings

Section 5: trip ends

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

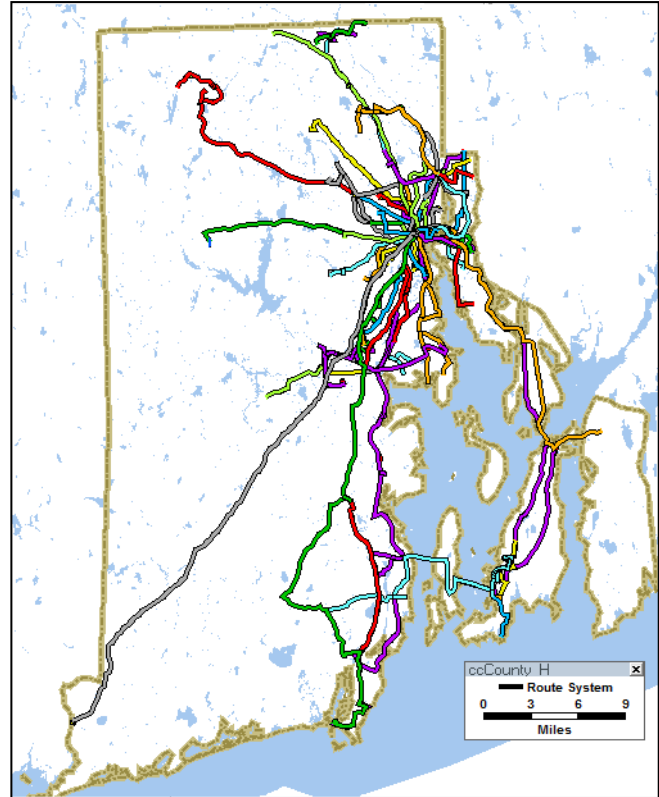
## Section 2: Methodology

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

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

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

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



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



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

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

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

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

### ***Survey responses***

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

### ***Survey expansion***

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

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

# Rhode Island Public Transportation Authority—2016 Origin-Destination Study

## Boardings by Route

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

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

# Rhode Island Public Transportation Authority—2016 Origin-Destination Study

## Completed Surveys by Route

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

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

# Rhode Island Public Transportation Authority—2016 Origin-Destination Study

## Base Weights by Route

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

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

## Distinct weights calculated and applied

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

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

Here are the weighting schemes as calculated and applied:

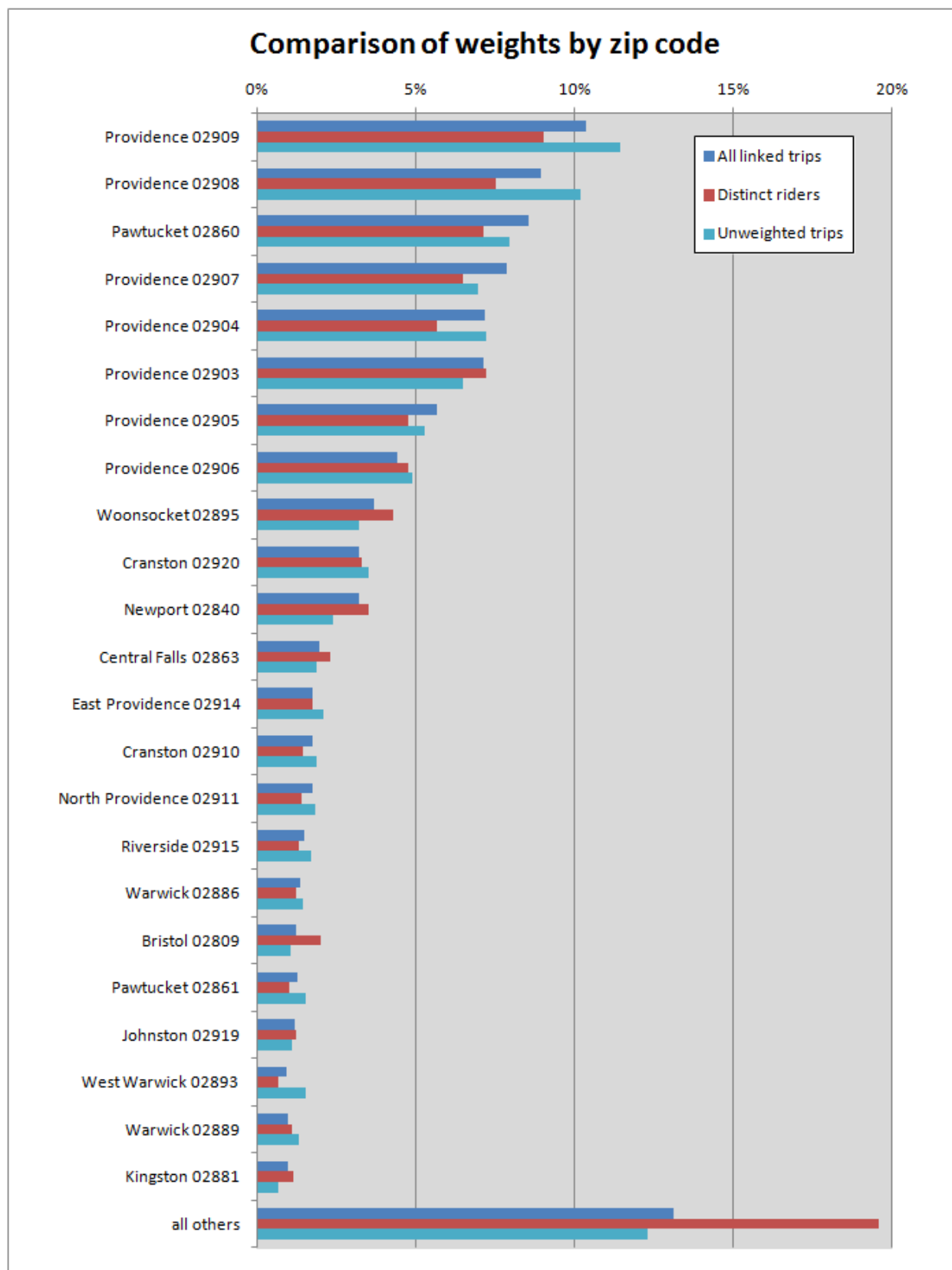
- All linked trips--These are the base weights, adjusted for the number of transfers used and then rescaled so that the sum matches the original 6799 responses. This weight ignores the frequency with which any individual traveler uses RIPTA.
- Distinct riders-- It is important to note the distinction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

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

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

## Application of the weights by zip code of residence

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



## Margin of error

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

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

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

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

## Section 3: Rider and Trip Characteristics

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

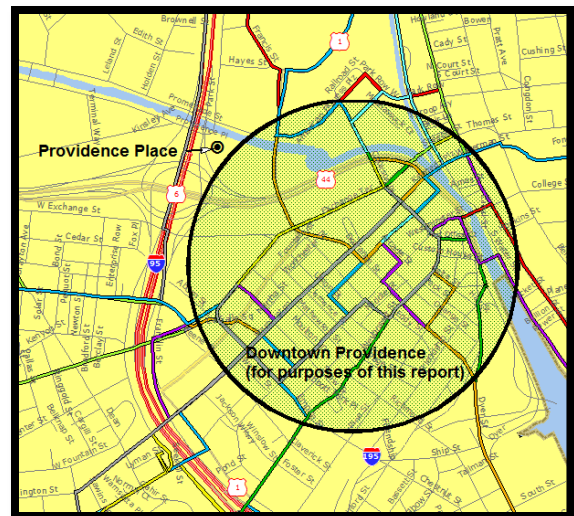
- |                       |                                  |
|-----------------------|----------------------------------|
| 1. Trip frequency     | 8. Home language                 |
| 2. Trip purpose       | 9. Access to a car or motorcycle |
| 3. Residency          | 10. Number of years riding RIPTA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

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

### A note about the selected major transit trip generators

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

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





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

### A note about the trip purposes

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

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

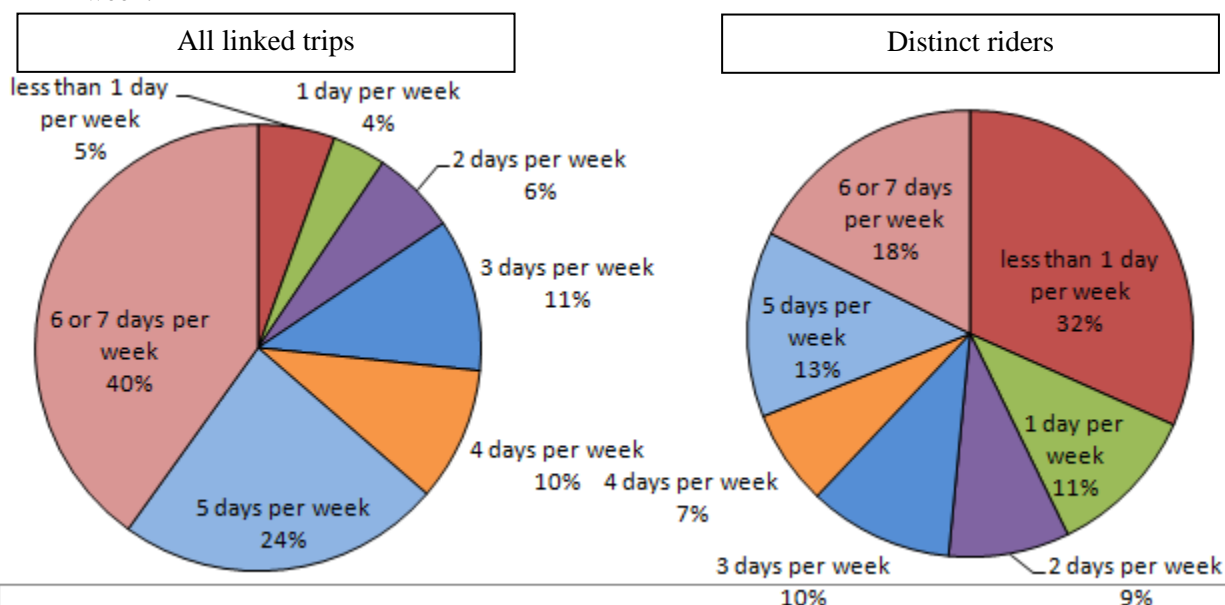
Trip purpose	<i><u>Neither end at:</u></i>	<i>One end at:</i>	Share of total trips	Share of total riders
NHBOther	Home	other	16.5%	20.3%

<i>All trip purposes</i>			<i>100.0%</i>	<i>100.0%</i>
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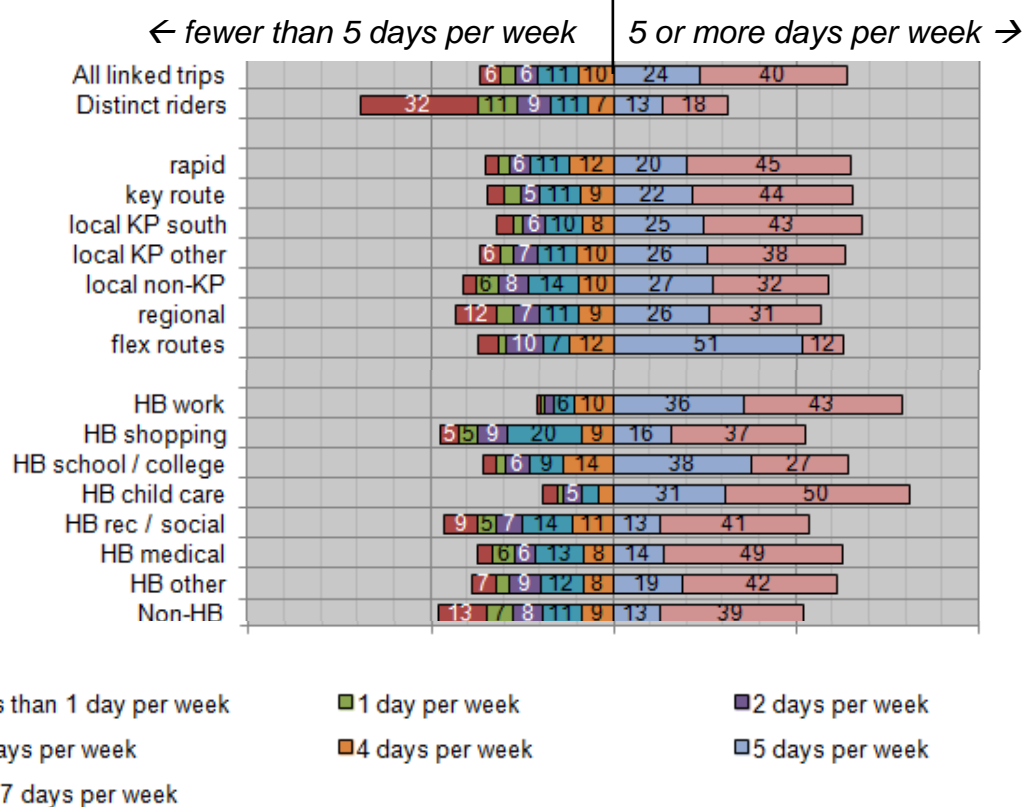
The “other” end for HBO trips includes any activity not specifically mentioned in the other categories. Non-home-based other (NHBOther) trips are generally for all trips that have neither end at a traveler’s home.

## Trip frequency

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

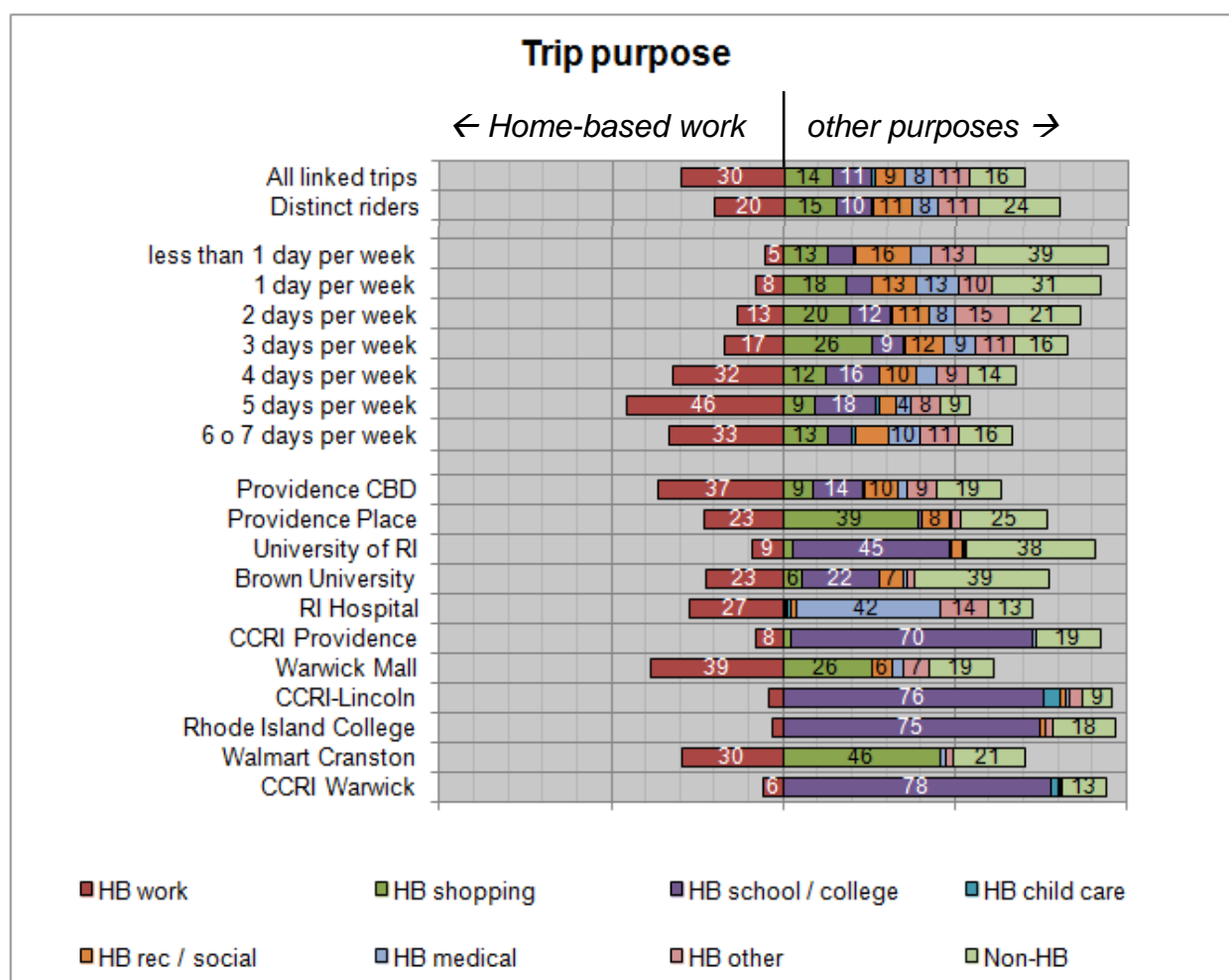
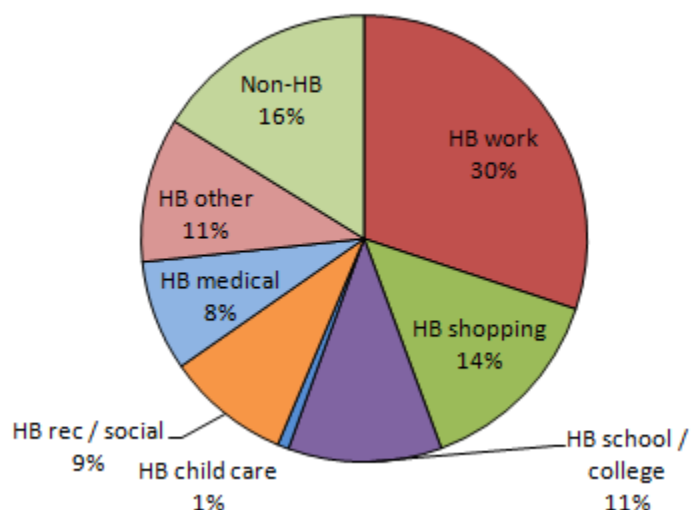


## How often do you typically ride RIPTA?



### Trip purpose

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

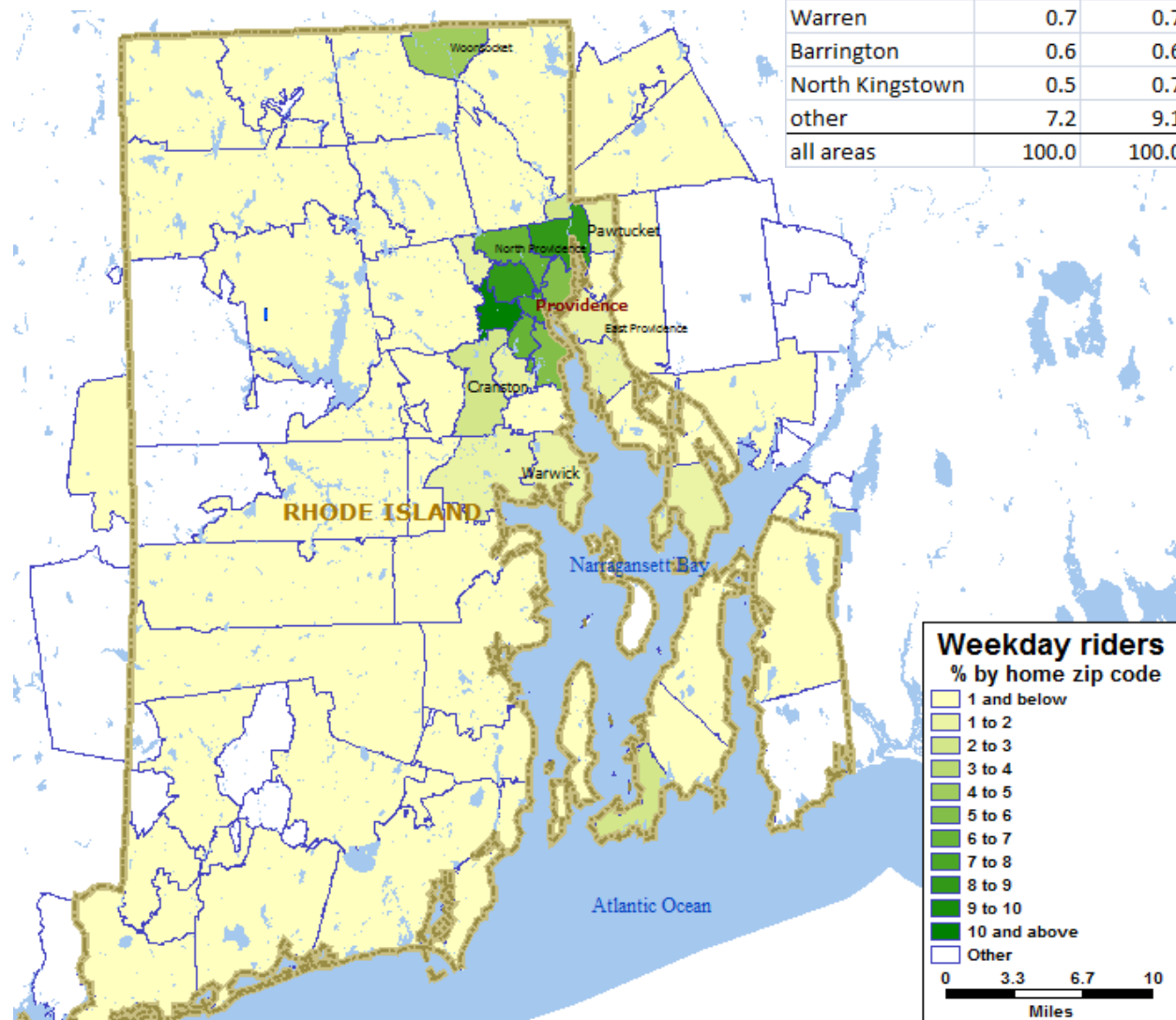


## Residence

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

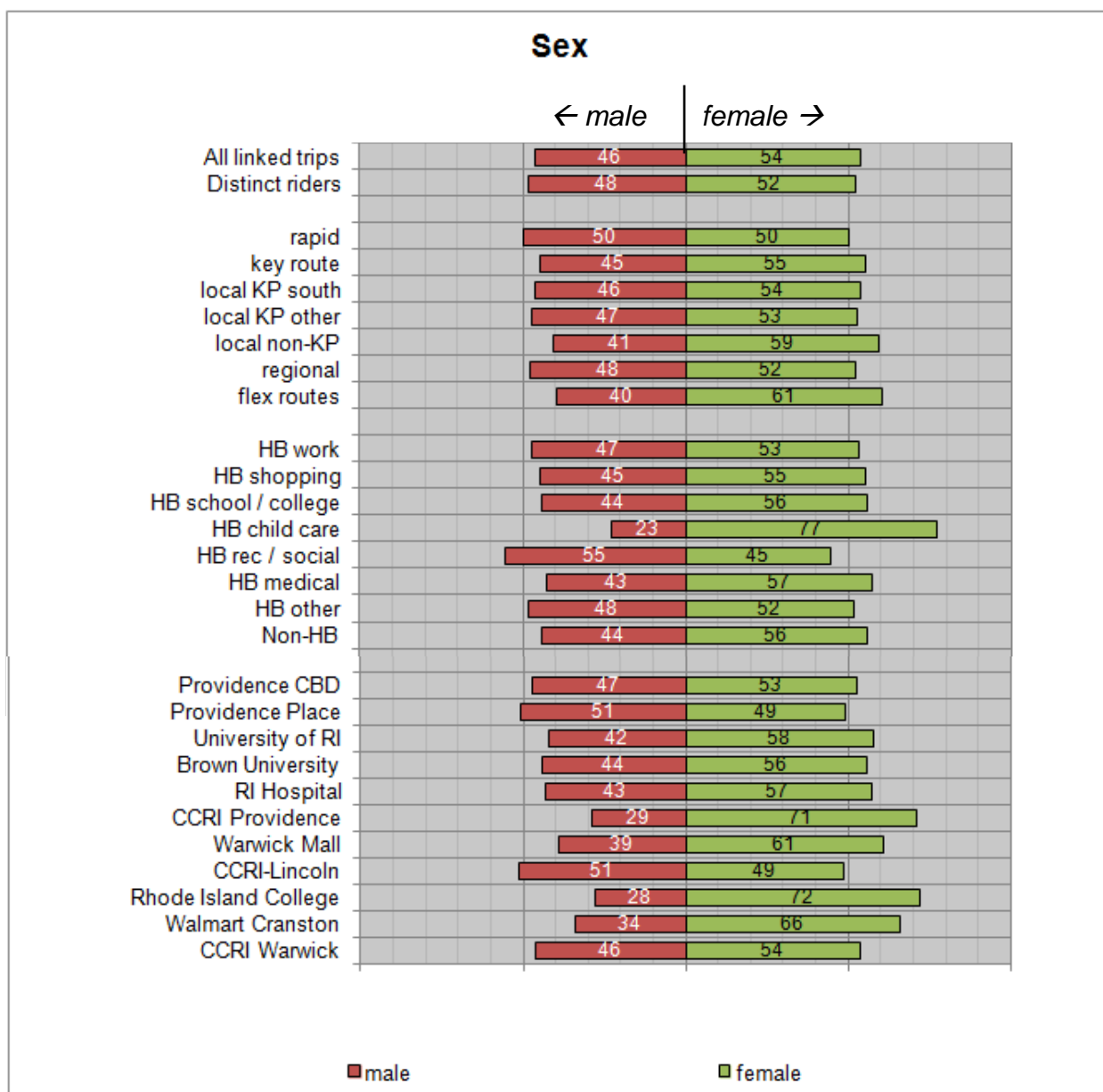
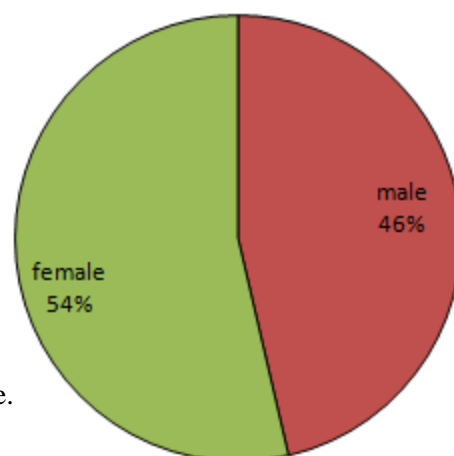
Percent of travelers by residence

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



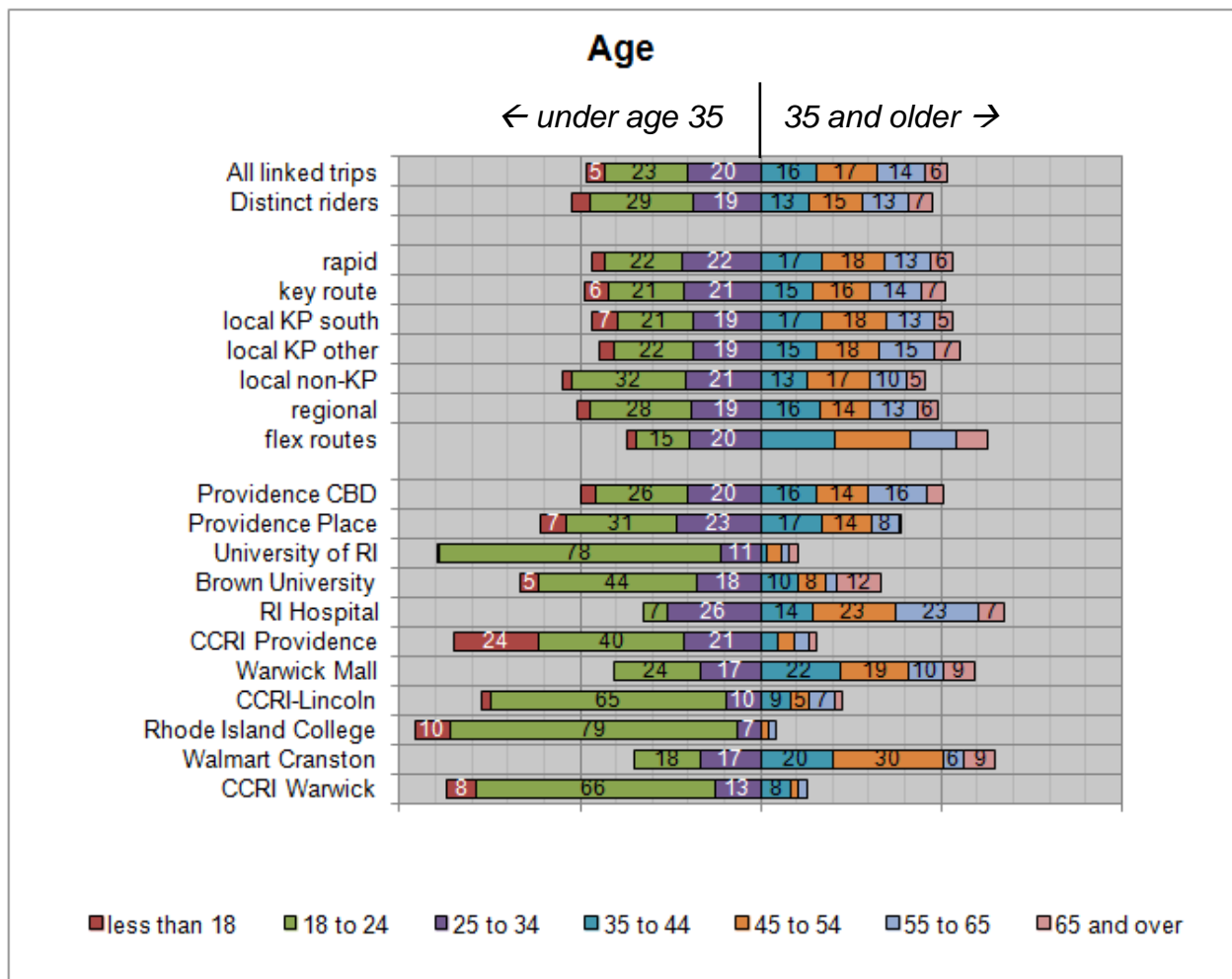
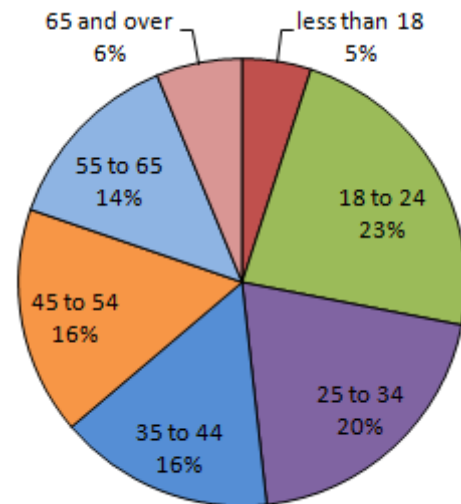
### Sex of passengers

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



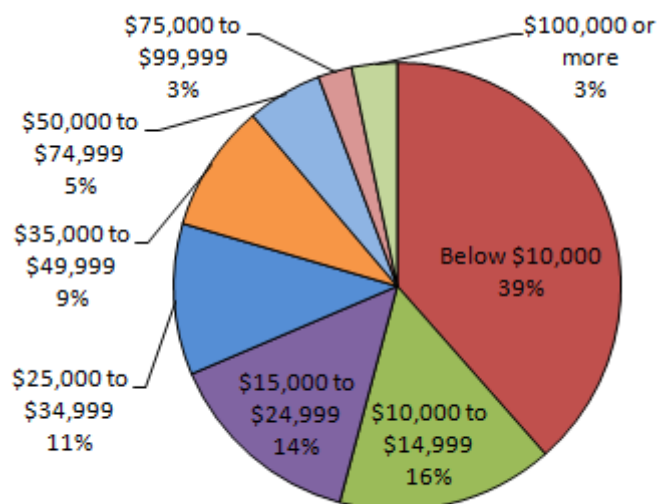
## Age

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



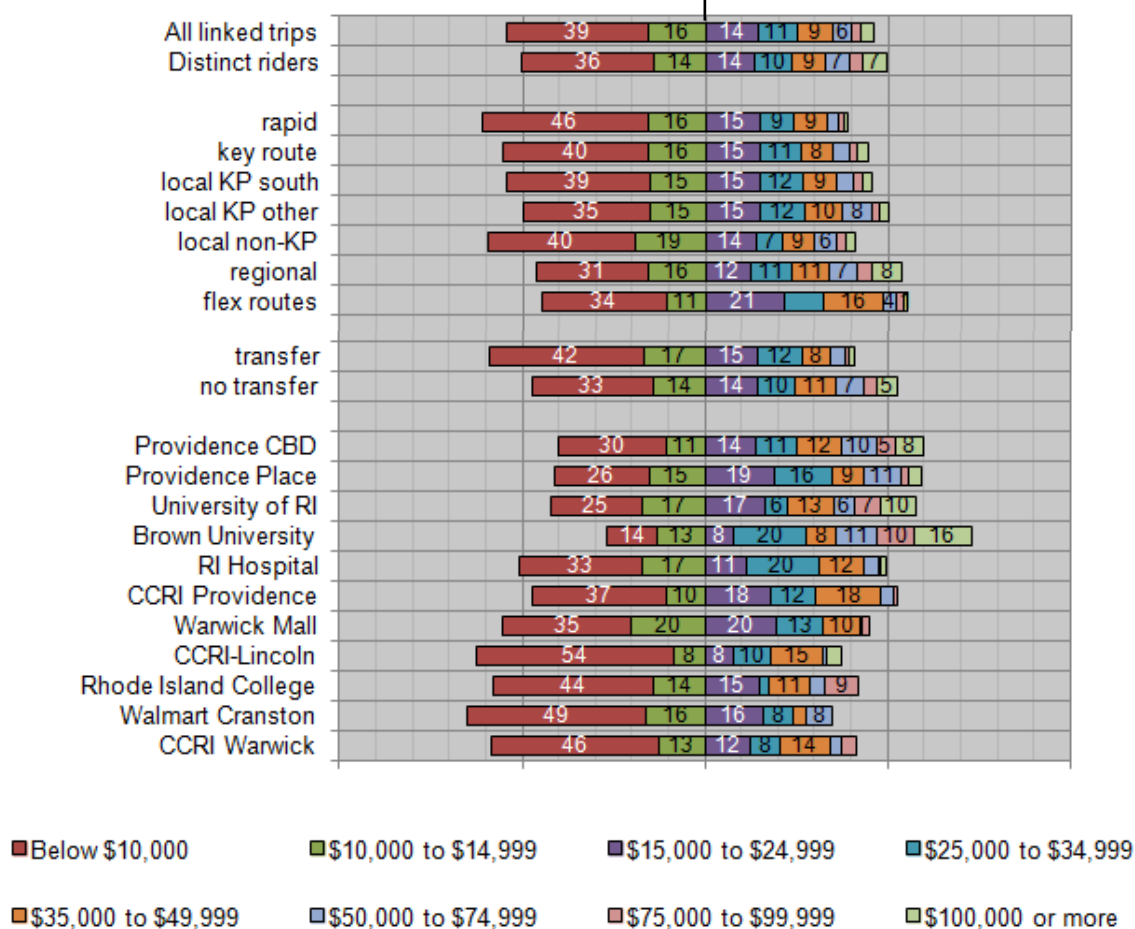
## Income

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



## Annual household income

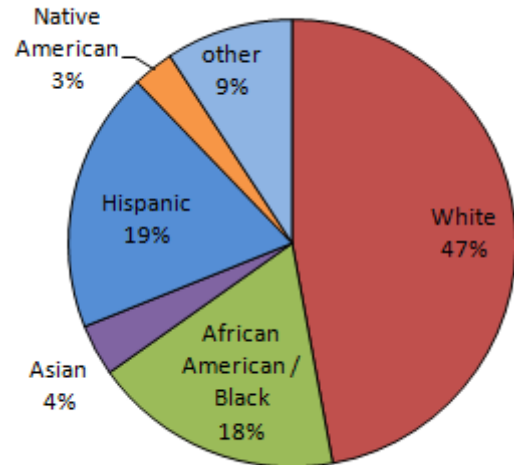
← less than \$15,000 | \$15,000 and over →



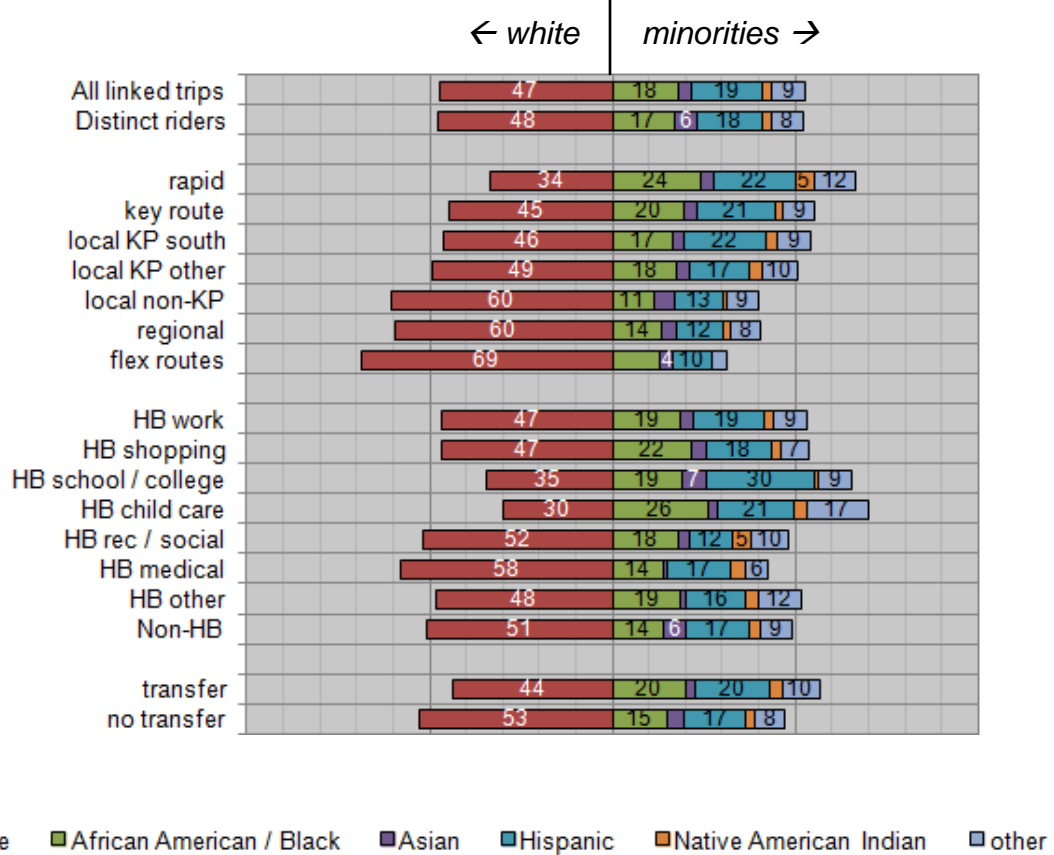


### Race and Ethnicity

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



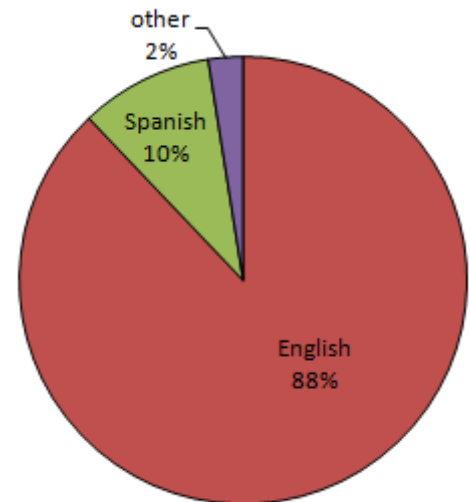
### How would you describe your race / ethnicity?





### Home Language

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



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

# RIPTA Fare Equity Analysis September 2019

September 17, 2019

LTK Engineering Services

## Contents

Introduction .....	1
Description of Fare Equity Analysis Policies and Procedures .....	2
Title VI, Environmental Justice and Fare Equity Analyses.....	2
Determining When an Equity Analysis is Required.....	3
Determining When a Disparate Impact Occurs .....	3
Determining When a Disproportionate Burden Occurs .....	3
Approach for Calculating Fare Impacts.....	3
Public Participation Process .....	4
Data.....	4
Analysis of Current Fare Product Use .....	5
Fare Equity Analysis .....	6
Current and Proposed Fare Structure.....	6
Analysis of Impacts .....	8
Average Impact on Low-Income and Minority Riders in Comparison With Overall Riders.....	12
Alternatives and Mitigation .....	14
Conclusion.....	15

## Introduction

RIPTA has proposed service improvements and a fare change for public comment and consideration by the RIPTA Board of Directors. While the service improvements are not considered to be a major service change, two of the improvements do have associated fare issues. This report provides an evaluation of the proposed fare changes 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 detailed later. The highlights of the proposal include:

- Eliminating the 10-Ride Pass
- Eliminating the 7-Day Pass
- Transfers will no longer be sold for riders paying with cash (Riders will need to pay their full fare for each boarding.)
- 1-Day Passes will no longer be sold onboard vehicles
- Implementing a new Wave Fare Structure using Smart Card or Mobile App
  - One hour of unlimited travel -- \$2.00 (\$1.00 for Seniors or individuals with disabilities during off-peak hours)
  - Activation Fee when first establishing a Wave Fare account and obtaining a Smart Card - \$5.00 (However, RIPTA is planning to distribute at least 10,000 complimentary Wave Smart Cards and establish those accounts at the start of the program.)
  - Replacement Fee for a replacement Smart Card -- \$5.00
  - Earn As You Go Fare Structure – Under this new structure, riders will never pay more than the price of a Day pass in one day (currently \$6.00) or the price of a Monthly pass in one calendar month (currently \$70.00)
- Implementing a new Limited Express Service Fare for service which serves destinations outside of the State of Rhode Island. This will initially apply only to the new Route 24L.
  - Single-ride fare -- \$4.00
  - Monthly Pass -- \$140.00
- Downtown Providence Corridor Fare -- \$1.00 (\$0.50 for Seniors or individuals with disabilities during off-peak hours)
- RIPTA is revising and expanding its third-party retail network. RIPTA is planning to add over 300 new sales locations, expanding access to its products statewide from the current approximately 40 outlets. All of the sites will allow customers to purchase currently can purchase fare products will offer Wave Fare cards as well as the ability to load value into Wave accounts. RIPTA will continue to sell fare products at its locations including Kennedy Plaza and RIPTA headquarters in Providence.

RIPTA's service improvements with associated fare issues include:

- RIPTA implemented the QX Quonset Express effective January 22, 2019 with a free promotional fare. This route operates in an area with little current or historic RIPTA service. Initial ridership was low so RIPTA significantly restructured the route and expanded it to serve three new communities, effective June 22, 2019, to increase ridership. Due to the significant restructuring, RIPTA again implemented a six month promotional fare to allow an opportunity for ridership to develop. RIPTA does receive a subsidy from Quonset Development Corporation to offset some

costs of operating this route, which is expected to exceed the foregone revenue from the promotional fare. RIPTA anticipates charging full fares beginning in early 2020.

- RIPTA implemented the 24L Newport / Fall River / Providence Express on August 31, 2019. This route is a new express service between Newport, Fall River, Somerset and Providence. It will connect to the Southeastern Regional Transit Authority (SRTA) through a stop in Fall River (MA). It will use the new Limited Express Service Fares.

The proposed fare changes will provide substantial benefits to RIPTA and its riders, including:

- Speeding up boarding times and thereby improving on-time performance;
- Increasing prepaid transactions and thereby reducing costs associated with accepting and handling cash;
- Reducing the potential for conflict between riders and operators;
- Improving affordability of fare products that currently have a high upfront cost; and
- Reducing costs for riders who do not currently purchase their most cost-effective fare product.

In addition, RIPTA will be no longer issue Change Cards on board its vehicles. As this does not change the fares charged by RIPTA it is not considered a fare change requiring a Fare Equity Analysis. Change Cards are rarely used, as they are currently issued as a result of overpayments on less than 5% of full and reduced fare boardings, and will not be needed for any rider switching to the Wave Card.

Eliminating Charge Cards will provide substantial benefits to RIPTA and its riders including speeding up boarding times, thereby improving on-time performance, as well as reducing the potential for conflict between riders and operators.

## Description of Fare Equity Analysis Policies and Procedures

### Title VI, Environmental Justice and Fare Equity Analyses

Under Federal Transit Administration regulations, agencies are required to adopt plans for compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”. Title VI requires 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 subjected to discrimination under any program or activity receiving federal financial assistance.” Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Environmental Justice is the principal that minority communities and low-income communities should not be subject to disproportionately high and adverse environmental effects, i.e., that there should be a fair distribution of the adverse impacts of, or burdens associated with, Federal programs, policies, and activities.

RIPTA’s Title VI Program 2018 – 2021, submitted April 1, 2018, sets forth its Service and Fare Equity (SAFE) Analysis policies and procedures, and describes the public involvement process that led to these policies. A brief description of these policies and the public process is set forth below.

## Determining When an Equity Analysis is Required

To determine whether a fare change would have a discriminatory impact on the basis of race, color or national origin, RIPTA first determines if the proposed change includes a change in the fare structure or a change in fares by fare payment method. Any proposal that involves a change to fare structure or to relative fares by fare payment method is assessed to determine whether it would have a disparate impact on minority riders or a disproportionate burden on low-income riders, unless it is subject to an exception. These exceptions are:

1. Promotional fare reductions lasting no longer than six months;
2. Temporary fare reductions mitigating construction or other activities disrupting rider travel patterns; and
3. Declared “fare free” days such as Air Quality Alert days.

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.

## Determining When a Disparate Impact Occurs

Determining whether a fare change would have a disparate impact on minority 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.
- If the average percentage fare increase for minority riders is five percentage points or more higher than the average percentage fare increase for non-minority riders, the fare change would be determined to have a disparate impact.

## 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.
- 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.

## Approach for Calculating Fare Impacts

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, minority riders and low-income riders who use 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.

Alternative fare payment methods or fare media available for individuals affected by the proposed changes will be presented and analyzed. This analysis will compare the fares paid by the individuals impacted by the proposed changes with fares that would be paid through available alternatives, and will identify the location of fare media distribution points relative to that of impacted populations.

### 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 eleven community organizations that represent Rhode Island's minority and Limited English Proficient communities and a significant percentage of its low-income population 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 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.

These policies and procedures were adopted by RIPTA's Board of Directors at its June 2016 meeting.

### Data

This analysis uses the data from RIPTA's Onboard Passenger Survey conducted during September and October, 2016, with a follow-up effort during January 2017. A total of 6,799 riders completed surveys which, after accounting for trip frequencies and transfers, translate into 75,313 weekly boardings, or 19.7% of total weekly RIPTA boardings. On a system-wide basis, this provided a 95% confidence level of

±1.11%. This information was used to allocate riders using each fare product between Low-Income, Non-Low-Income, Minority, and Non-Minority categories. The total number of riders using each fare product is taken from RIPTA's farebox data for the period from June 2018 through May 2019.

RIPTA's Title VI program does not include a locally developed threshold to define "low-income." This definition therefore defaults to that included in FTA C4702.1B, Chapter 1, Section 5.m., to mean "a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines." The FTA does allow agencies to use higher thresholds and include more individuals in the definition of low-income, but does not allow agencies to use lower thresholds. Since the survey occurred during 2016, the applicable guidelines are those that applied during 2016. These are shown in the table below, along with the share of Rhode Island households of each size.

Table 1: Rhode Island Households and Poverty		
Size of Household	Poverty Level Guideline	Share of RI Households of that Size <sup>1</sup>
1	\$11,880	31%
2	\$16,020	33%
3	\$20,160	16%
4	\$24,300	13%
5	\$28,440	5%
6+	\$32,580	2%

<sup>1</sup> Based on *American Community Survey 5-Year Estimates* for Rhode Island

As RIPTA's Onboard Passenger Survey did not collect data on household size, we need a single figure for to classify riders as low-income or non-low-income. The average of the above poverty level guidelines weighted by the share of households of each size is approximately \$17,500. The survey included income categories of "Below \$10,000", "\$10,000 to \$14,999", "\$15,000 to \$24,999", and several higher categories. Defining low-income riders for the purpose of this analysis as riders stating an income of \$24,999 and lower would mean that we are including all low-income households with 4 or fewer members, which is 93% of all low-income households, plus a significant share of low-income households with five or more members.

Survey respondents were asked to describe their race/ethnicity and provided with 6 options: White, African American / Black, Asian, Hispanic, Native American Indian, and Other. Riders responding with White were classified as non-minority. Riders responding in any other way were classified as minority.

## Analysis of Current Fare Product Use

Table 2 below presents a profile of fare usage by group – minority, low-income and overall ridership (boardings). The highlighted fare products are being eliminated.

Table 3 presents the percentage of riders in each group using each fare product. Products being eliminated are again highlighted. As can be seen in the table, fare product use by each group is quite similar. Bolded values are situations where the use of a fare product by a group is more than 10% higher its use by all riders.



Table 2: Current Fares and Usage by Group				
Current Fare Type		Usage by Group		
		All Riders	Low-Income	Minority
Full-Fare	Cash	2,009,179	1,319,800	1,124,808
	Cash Fare & Transfer	1,440,230	946,066	806,290
	10-Ride Pass (3)	215,074	132,257	118,033
	10-Ride & Transfer	626,700	385,381	343,934
Reduced	S/D Cash (1)	40,644	37,355	17,105
	S/D Cash & Transfer (1)	43,006	39,526	18,099
Passes	1-Day Pass	360,125	243,116	229,921
	7-Day Pass	160,178	96,639	78,267
	Monthly Pass	4,867,594	3,089,990	2,783,538
	MBTA Pass	22,363	14,196	12,788
	UPASS (3)	790,177	313,554	375,385
	ECOPASS (3)	134,212	47,856	47,479
Free	Low-Income Senior / Disabled	4,418,212	4,418,212	1,859,441
	Employees, Other Free, & Other (4)	195,688	115,205	98,382
Agency	2 Hour Pass	292,184	292,184	146,896

Table 3: Current Fares and Usage by Group				
Current Fare Type		Usage by Group		
		All Riders	Low-Income	Minority
Full-Fare	Cash	12.9%	11.5%	14.0%
	Cash Fare & Transfer	9.2%	8.2%	10.0%
	10-Ride Pass (3)	1.4%	1.2%	1.5%
	10-Ride & Transfer	4.0%	3.4%	4.3%
Reduced	S/D Cash (1)	0.3%	<b>0.3%</b>	0.2%
	S/D Cash & Transfer (1)	0.3%	<b>0.3%</b>	0.2%
Passes	1-Day Pass	2.3%	2.1%	<b>2.9%</b>
	7-Day Pass	1.0%	0.8%	1.0%
	Monthly Pass	31.2%	26.9%	<b>34.5%</b>
	MBTA Pass	0.1%	0.1%	<b>0.2%</b>
	UPASS (3)	5.1%	2.7%	4.7%
	ECOPASS (3)	0.9%	0.4%	0.6%
Free	Low-Income Senior / Disabled	28.3%	<b>38.4%</b>	23.1%
	Employees, Other Free, & Other (4)	1.3%	1.0%	1.2%
Agency	2 Hour Pass	1.9%	<b>2.5%</b>	1.8%

## Fare Equity Analysis

### Current and Proposed Fare Structure

Table 4 presents RIPTA's current fare products and the proposed changes. Two of these changes, the introduction of new fare products, are expected to serve populations that generally reflect RIPTA's overall ridership and therefore have equal impact on low-income, minority, and overall ridership. In

addition, the temporary free fare on the QX Quonset Express is exempt from a Fare Equity Analysis. These three changes are discussed briefly below. The other changes to RIPTA's fare structure are discussed in greater length following Table 4.

- The new Limited Express Service fare will only apply to a new service that is currently being implemented. Therefore, it will not impact any existing riders. The route is not expected to serve a disproportionately higher level of low-income or minority riders, and therefore this fare is not expected to create any Title VI issues.
- The Downtown Providence Corridor Fare will be a new fare that applies only to trips with both their origin and their destination in the 1.4 mile long Downtown Transit Connector Corridor (DTC). The DTC will run between the Providence Amtrak / MBTA Station and the Hospital District in Upper South Providence, and is part of the City's broader long-term vision for this area. The DTC plan includes modifying several routes to provide additional service in this corridor and eliminate transfers at Kennedy Plaza for many passengers commuting from outlying suburbs. While the routes serving this corridor (Routes 1, 3, 4, 51, 54, 55, 58, 62, 72, and 92) carry about 9,100 riders daily, several of them terminate at Kennedy Plaza and very few riders travel only within this corridor. Furthermore, many of the riders who do travel only within the corridor are understood to pay with passes. The new fare, together with the improved service, is intended to generate new trips, such as lunchtime travel by individuals who drove to downtown or reside in downtown. Residents served by this corridor are diverse population, but disproportionately minority and low-income. Providing this lower fare in this corridor does not raise any Title VI issues.
- As stated above, RIPTA implemented the QX Quonset Express effective January 22, 2019 with a free promotional fare. Ridership was low so RIPTA significantly restructured the route and expanded it to serve three new communities effective June 22, 2019 to increase ridership. Due to the significant restructuring, RIPTA again implemented a six month promotional fare. RIPTA does receive a subsidy from Quonset Development Corporation to offset some costs of operating this route, which is expected to exceed the foregone revenue from the promotional fare. Promotional fare reductions lasting less than 6 months are specifically exempt from Fare Equity Analyses. RIPTA anticipates charging full fares beginning in early 2020.

Table 4: Changes in Fares						
			Cost		Change	
Current Fare Type		Change?	Existing	Proposed	Absolute	Percentage
Full-Fare	Cash	No	\$ 2.00	\$ 2.00	\$ -	0%
	Cash Fare & Transfer	Transfers Eliminated	\$ 3.00	\$ 4.00	\$ 1.00	33%
	No	Limited Express Service Full Fare	NA	\$4.00	NA	NA
	Cash	Downtown Providence Corridor Fare	\$ 2.00	\$1.00	\$ (1.00)	-50%
	10-Ride Pass (1)	Replaced by Wave Stored Value	\$ 2.00	\$ 2.00	\$ -	0%
	10-Ride & Transfer (1)	Replaced by Wave Stored Value (2)	\$ 2.00	\$ 2.00	\$ -	0%
Reduced (Off-	S/D Cash (3)	No	\$ 1.00	\$ 1.00	\$ -	0%
	S/D Cash & Transfer (3)	Transfers Eliminated	\$ 1.50	\$ 2.00	\$ 0.50	33%
Passes	1-Day Pass	No	\$ 6.00	\$ 6.00	\$ -	0%
	7-Day Pass	Eliminated	\$ 25.00	*	NA	NA
	Monthly Pass	No	\$ 70.00	\$ 70.00	\$ -	0%
	No	Limited Express Service Monthly Pass	NA	\$ 140.00	NA	NA
	MBTA Pass (4)	No	NA	NA	NA	NA
	UPASS (5)	No	\$ 1.42	\$ 1.42	\$ -	0%
Free	ECOPASS (5)	No	\$ 1.77	\$ 1.77	\$ -	0%
	Low-Income Senior / Disabled (6)	No	\$ -	\$ -	\$ -	0%
Agency	Employees, Other Free, & Other (7)	No	\$ -	\$ -	\$ -	0%
	2 Hour Pass	No	\$ -	\$ -	\$ -	0%

(1) 10-Ride tickets cost \$20 for 10 trips. These are therefore the cost per trip with these fare products.

(2) Transfer period changed from 2 hours to 1 hour.

(3) Off-peak fare. These riders pay full fare during peak hours (7am-9am, 3pm-6pm)

(4) MBTA Zone 8-10 Passes are valid on RIPTA with no extra charge.

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

(6) All low-income seniors and individuals with disabilities pay no fare with the RIPTA NO FARE ID PASS.

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

## Analysis of Impacts

The elimination of the 10-Ride Pass and 7-Day Pass, the elimination of cash transfers, and the implementation of Wave Fare Structure are part of a single package of changes designed to reduce RIPTA's costs of fare collection and improve the ability of all regular riders, especially low-income riders, to take advantage of RIPTA's discounts. If a rider has a Wave Card (or virtual Wave Card using a Mobile Device) with at least \$2 in value loaded on it, they will be able to transfer at no change. Thus riders for an upfront cost of \$2<sup>1</sup>, will receive similar benefits as an individual who currently purchases a 10-Ride Pass for an upfront cost of \$20, although there will be a shorter window for making transfers. Furthermore, if a rider spends \$6 for transit travel in a single day, all future travel during that day will be free, the same as if a rider had purchased a 1-Day Pass for an upfront cost of \$6. Finally, if a rider spends \$70 for transit travel during a calendar month, all future travel during that month will be free (except for travel on the 24L), the same as if a rider had purchased a Monthly Pass for an upfront cost of \$70. A driving factor behind this change is that RIPTA understands that some of its low-income riders are unable to pay these upfront costs, and therefore are unable to obtain these discounts. In addition, RIPTA currently has only about 40 outlets at which it sells its fare products, in addition to selling them

<sup>1</sup> At its own facilities, RIPTA will impose no minimum when loading value to a Wave account if paying with cash, but a minimum load of \$10 when paying with a credit card. RIPTA will impose no minimums on third party retailers, but they will set their own policies, possibly including minimum loads.

online (which requires a credit or debit card) and at RIPTA facilities such as Kennedy Plaza and RIPTA headquarters in Providence. Unbanked individuals therefore likely have less access to these fare products, other than the 1-Day Pass which can be purchased on buses.

Riders who currently pay with cash and make transfers will no longer be able to purchase discounted transfers, raising the cost of a one-way trip from \$3 (\$2 initial fare plus \$1 for a transfer) to \$4 or more (\$2 per boarding). Cash riders also will not receive the benefit of a \$6 daily cap or \$70 monthly cap on transit fares (excluding the 24L). Cash riders are generally believed to fall into three principal groups:

1. Riders for whom there is no better fare product, such as occasional riders making a few trips during a day with no transfers;
2. Riders, especially individuals who travel very infrequently, for whom the value of transfer charges is less than the value of the time they would need to spend to learn about and obtain a cheaper fare product (such as a 10-Ride Pass); and
3. Riders who cannot access other fare products and/or pay the upfront cost of a fare product with a lower cost per trip.

Riders in the first category will not be impacted by the proposed fare changes. Riders in the second category will be impacted by the increase in the transfer charges, however they have shown low sensitivity to such charges in the past. Furthermore, the expansion of RIPTA's sales network and the fact that the Wave Fare Structure automatically provides the lowest cost fare will reduce the amount and value of time required to obtain the cheapest possible fare product, likely leading some of these individuals to switch to the Wave card. Riders in the third category will benefit from the expansion of RIPTA's sales network and the lower upfront costs with the Wave card, probably leading many of these individuals to switch to the Wave card.

54% of respondents to RIPTA's 2016 Survey who stated that they paid with cash also stated that they typically traveled on RIPTA 5 or more days per week. Most of these riders (unless they were consistently making only a one-way trip) would benefit from using a 7-Day or Monthly Pass. There are two principal reasons why riders would choose cash over using a pass:

1. The rider for some reason cannot obtain a pass, such as being unable to pay the upfront cost of a pass or being unbanked and unable to reach a RIPTA outlet; or
2. The rider is able to obtain a pass but for some other reason, such as privacy concerns or a low sensitivity to the cost of transit, does not desire a pass.

Table 5 shows the current fares and usage by group, excluding riders who do not directly pay for their own transportation such as free riders, as well as those who receive Agency transportation, UPASS, or EcoPass. This shows that low-income riders have slightly higher use of cash, and especially cash plus transfers, and slightly lower use of most prepaid products (10-Ride Pass, 7-Day Pass, and Monthly Pass). Minority riders have a lower use of cash and higher use of monthly passes. This supports RIPTA's understanding that low-income riders are more likely to be unable to pay the upfront cost or access most of RIPTA's fare products. 1-Day passes have a lower upfront cost than the other three prepaid alternatives, and currently can be purchased on the bus, making them more available to financially constrained individuals. Expanding RIPTA's fare outlets from about 40 to over 300 statewide (including Kennedy Plaza and RIPTA's headquarters) will make all fare products much more accessible to low-income riders, and allowing riders to pay for 1-Day and Monthly Passes as they use transit should

provide a greater benefit to low-income riders than all riders. A map showing RIPTA's statewide routes, minority and low-income census tracts, and the proposed fare outlet locations is attached as Figure 1.

<b>Table 5: Current Fares and Usage by Group (excluding Free /Agency / UPASS / EcoPass Riders)</b>				
<b>Current Fare Type</b>		<b>Usage by Group</b>		
		<b>All Riders</b>	<b>Low-Income</b>	<b>Minority</b>
Full-Fare	Cash	20.5%	20.9%	20.3%
	Cash Fare & Transfer	14.7%	15.0%	14.6%
	10-Ride Pass (3)	2.2%	2.1%	2.1%
	10-Ride & Transfer	6.4%	6.1%	6.2%
Reduced	S/D Cash (1)	0.4%	0.6%	0.3%
	S/D Cash & Transfer (1)	0.4%	0.6%	0.3%
Passes	1-Day Pass	3.7%	3.9%	4.2%
	7-Day Pass	1.6%	1.5%	1.4%
	Monthly Pass	49.7%	49.0%	50.3%
	MBTA Pass	0.2%	0.2%	0.2%

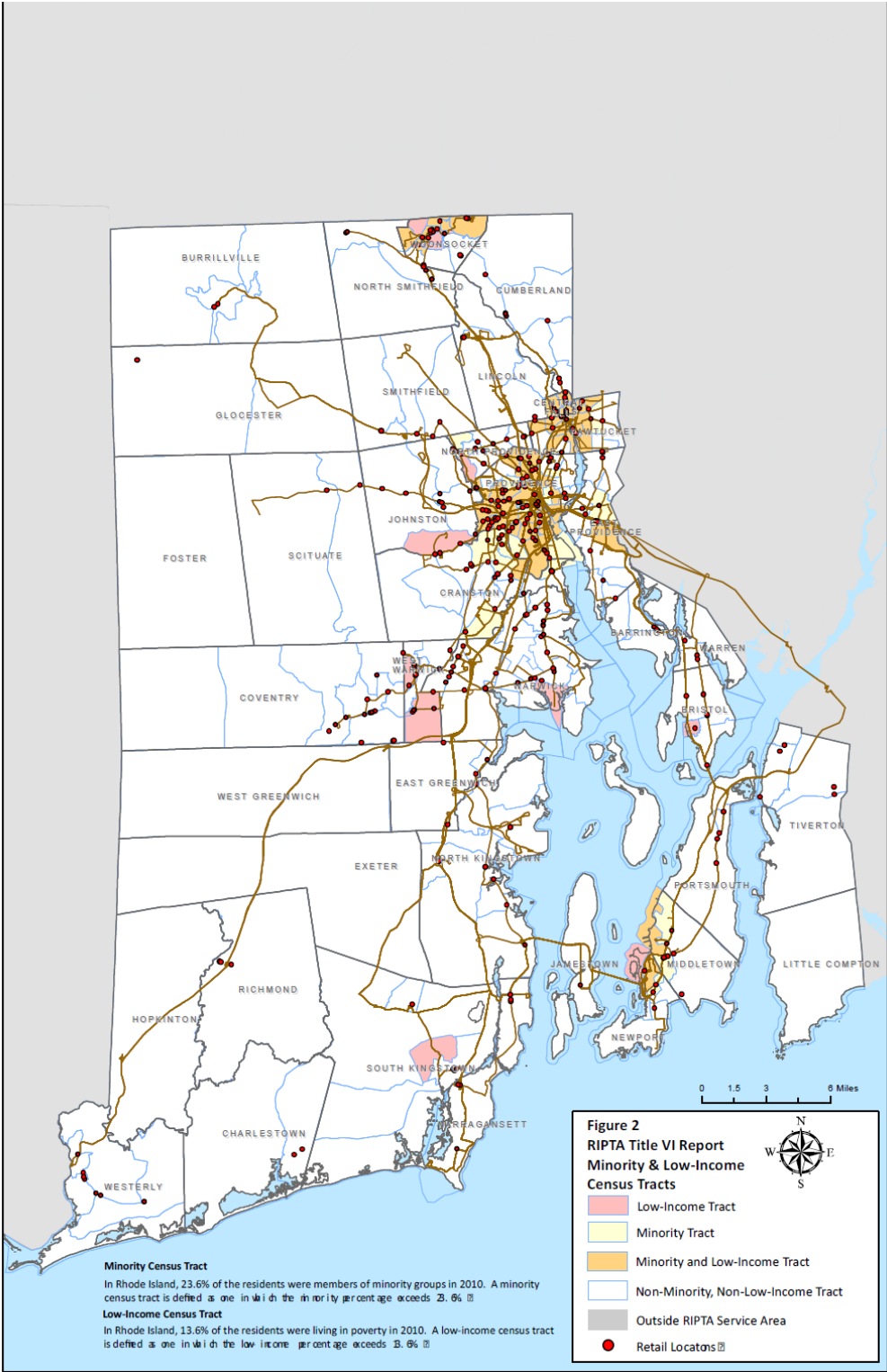
A key element of the above discussion is that it assumes riders already have a Wave Card. The \$5 charge to obtain or replace a card is an upfront cost that is not present in the current system. This charge has been implemented for several business reasons, including to:

- Cover the cost of the cards;
- Encourage riders to view the cards as reloadable, extended use cards; and
- Discourage the casual disposing or loss of the cards, as well as the hoarding of cards.

The \$5 charge is recovered by a rider after 5 trips for which he or she would otherwise have paid the cash fare plus the current transfer charge, but it is a potential barrier. RIPTA will address this through its plan to distribute approximately 10,000 complimentary Wave smart cards with free accounts at the start of the program. RIPTA is planning on conducting a major outreach effort to low-income riders to communicate the benefits of the Wave Fare Structure along with this distribution of complimentary Wave smart cards and assistance in setting up free accounts.

The other key element, and potential barrier, is loading value into the Wave accounts. Currently customers purchasing RIPTA fare products need a debit or credit card to purchase products online, and can only use cash at its roughly 20 outlets. As stated above, RIPTA will be implementing over 300 new fare outlets statewide and customers will be able to use cash to add value to Wave accounts at all of these locations. RIPTA will impose no minimums when loading value to a Wave account, although these outlets will set their own policies on minimums. As shown in Figure 1, these planned outlets are well distributed across the state, but with a greater density in the Minority and Low-Income Census Tracts.

Figure 1: Map of RIPTA Statewide Routes and Proposed Fare Outlets



The only fare product that is being totally eliminated and not replicated on the Wave Fare Structure is the 7-Day Pass. As shown in Table 5, 7-Day Passes are used slightly less by minority and low-income riders than by all riders, thus this is unlikely to cause a Disparate Impact or Disproportionate Burden. It is also important to note that for any rider who uses RIPTA on a consistent basis, the 7-Day Pass is more expensive on a monthly basis than a Monthly Pass. Only two groups of riders benefit from the 7-Day pass:

1. Those who cannot afford the upfront cost of the Monthly Pass; and
2. Those who make heavy use of RIPTA for five or more days in a week, but less than 12 days in a month.

The Wave Fare Structure has already addressed the needs of the first of these groups, providing a lower upfront cost than with the 7-Day Pass while providing the higher monthly savings of the Monthly Pass. With respect to the second group, 78.1% of respondents to RIPTA's 2016 survey who used the 7-Day Pass reported that they typically rode RIPTA 5 or more days per week. The riders who would be disadvantaged by the removal of this pass are those who normally travel 4 or fewer times per week, but bought a pass during the week of the survey. Thus, about 22% of the 7-Day Pass riders (making about 0.2% of all boardings) may be disadvantaged by the removal of this pass.

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

RIPTA's Title VI process requires a comparison of the average impact on low-income and minority riders compared with overall riders. Three comparisons are set forth in Tables 6 and 7 below. The comparison in Table 6 assumes no riders choose to change fare products unless their fare product is eliminated. The principal assumptions in this analysis are as follows:

- Riders paying cash and transferring will now pay \$2 for each transfer boarding and will not use Wave cards.
- Riders using 1-Day Passes will obtain Wave cards during the initial free distribution and will not travel sufficiently to reach the monthly cap.
- All riders currently using 7-Day Passes are assumed to obtain Wave Cards during the initial free distribution as they have shown a willingness and ability to purchase prepaid fare products. They are assumed to make a single round-trip per day and travel with the frequency shown in RIPTA's 2016 survey.
- Monthly Pass riders are assumed to obtain Wave Cards during the initial free distribution as they have shown a willingness and ability to purchase prepaid fare products. They are assumed to make a single round-trip per day and travel with the frequency shown in RIPTA's 2016 survey.
- All riders currently using 10-Ride Passes are assumed to obtain Wave Cards during the initial free distribution as they have shown a willingness and ability to purchase prepaid fare products. We further assume that riders will make round trips and travel as with the frequency distribution shown in the 2016 RIPTA survey. (54% of these riders will travel 5 or more days per week.) Consistent with an analysis of RIPTA current transfer boardings, 75% of transfer boardings will be assumed to be made within one hour after the initial boarding and therefore have no charge. 25% of transfer boardings will be made more than one hour after the initial boarding and have a charge of \$2.
- As riders using MBTA Passes are not paying fares to RIPTA, revenue from these riders is assumed to be zero.



- Riders not paying fares (either riding free or receiving fare products from agencies) are excluded from this calculation.

Table 6: Average Weekly Fare and Percent Change With Low Wave Use			
	Current Average Fare	Proposed Average Fare	% Change in Average Fare
Overall Riders	\$ 17.96	\$ 18.54	3.2%
Low-Income Riders	\$ 17.97	\$ 18.59	3.5%
Minority Riders	\$ 17.96	\$ 18.56	3.3%

The comparison in Table 7 assumes that some riders with fare increases switch to the Wave card. The principal assumptions in this analysis are as follows:

- The excess share of low-income riders who use cash, compared with all riders, do so because they are unable to obtain a 1-Day Pass or Monthly Pass due to lack of access or being unable to pay the upfront cost. An additional 50% of all riders paying the cash fare or the senior / disabled cash fare plus a transfer will switch to the Wave card. We assume that these riders will obtain Wave Cards during the initial free distribution. We further assume that riders will make round trips and travel as with the frequency distribution shown in the 2016 RIPTA survey. (54% of these riders will travel 5 or more days per week.) . Consistent with an analysis of RIPTA current transfer boardings, 75% of transfer boardings will be assumed to be made within one hour after the initial boarding and therefore have no charge. 25% of transfer boardings will be made more than one hour after the initial boarding and have a charge of \$2.
- The excess share of low-income riders who use 1-Day Passes, compared with all riders, do so because they are unable to obtain a Monthly Pass due to lack of access or being unable to pay the upfront cost. We assume that these riders will obtain Wave Cards during the initial free distribution. We further assume that riders will make round trips and will travel 5 or more days per week.
- Monthly Pass riders are assumed to have Wave Cards, make a single round-trip per day, and travel with the frequency shown in RIPTA's 2016 survey.
- All riders currently using 10-Ride Passes are assumed to obtain Wave Cards during the initial free distribution. We further assume that riders will make round trips and travel as with the frequency distribution shown in the 2016 RIPTA survey. (54% of these riders will travel 5 or more days per week.) Consistent with an analysis of RIPTA current transfer boardings, 75% of transfer boardings will be assumed to be made within one hour after the initial boarding and therefore have no charge. 25% of transfer boardings will be made more than one hour after the initial boarding and have a charge of \$2.
- As riders using MBTA Passes are not paying fares to RIPTA, revenue from these riders is assumed to be zero.
- Riders not paying fares (either riding free or receiving fare products from agencies) are excluded from this calculation.



Table 7: Average Weekly Fare and Percent Change With Moderate Wave Use			
	Current Average Fare	Proposed Average Fare	% Change in Average Fare
Overall Riders	\$ 17.96	\$ 16.67	-7.2%
Low-Income Riders	\$ 17.97	\$ 16.64	-7.4%
Minority Riders	\$ 17.96	\$ 16.71	-7.0%

As shown above, the key to the impact of the proposed fare change is the extent to which riders adopt the Wave card, especially riders who currently use cash. If they fail to adopt the Wave card riders will, on average, experience a fare increase. Furthermore, low-income and minority riders will, on average, experience a higher fare increase than the overall average rider. However, this difference is a fraction of a percentage point and does not reach the 5% threshold for being considered either a disparate impact on minority riders or a disproportionate burden on low-income riders.

If 50% of cash riders adopt the Wave card, then this fare change would, on average, decrease fares for riders, with the greatest decrease for low-income riders. Minority riders would have slightly less of a decrease on average than the average for all riders, but again this difference is a fraction of a percentage point and does not reach the 5% threshold for being considered either a disparate impact on minority riders or a disproportionate burden on low-income riders.

Based on these results, there is no disparate impact, nor disproportionate burden. It is important to note that this analysis incorporates as two key assumptions:

1. That RIPTA will be making an initial distribution of free Wave smart cards (and accounts) at the beginning of this process, and will make a special effort to distribute these to low-income riders; and
2. That RIPTA is implementing a major expansion of its retail network to serve riders not well served by its internet and mobile phone options.

The analysis would look considerably different if current 7-Day Pass and 10-Ride Pass riders were assumed to need to pay with cash because they were unable to obtain Wave accounts or cards, or unable to add value to their accounts.

### Alternatives and Mitigation

As the proposed alternative would not have a disproportionate burden on low-income riders or a disparate impact on minority riders, RIPTA is not required to take additional steps to avoid, minimize or mitigate impacts where practicable. We note that the initial distribution of free Wave accounts and cards and the expansion of its retail network are already key mitigating factors, and that it is important that these be in place before the fare change. We do suggest that RIPTA consider a program to work with agencies serving the low-income population that will waive or reduce the initial fees for establishing a Wave account for individuals who are below poverty level but not eligible for the RIPTA No Fare ID. Waiving fees for replacement cards is not recommended, as this would encourage riders to obtain multiple cards and potentially resell cards.

## Conclusion

This analysis has demonstrated that there will be no disparate impact on minority riders or disproportionate burden on low-income riders of RIPTA's system from this proposed fare change. RIPTA's new fares have already incorporated changes to minimize and mitigate the impact of its fare change on low-income and minority riders, which is key to this finding.