



235 PROMENADE STREET
2ND FLOOR, SUITE 230
PROVIDENCE, RI 02908

BENNY BERGANTINO
TITLE VI COORDINATOR
401-222-1755
401-222-2083
BENNY.BERGANTINO@DOA.RI.GOV

TITLE VI REPORT 2024

*SUBMITTED AS SUB-RECIPIENT TO THE RHODE ISLAND DEPARTMENT OF
TRANSPORTATION*

November 1, 2024

TABLE OF CONTENTS

I.	INTRODUCTION	4
II.	TITLE VI – NON-DISCRIMINATION POLICY STATEMENT NOTICE TO BENEFICIARIES	8
III.	TITLE VI – NON-DISCRIMINATION ASSURANCES	8
IV.	TITLE VI - COORDINATOR RESPONSIBILITIES.....	9
V.	SUB-RECIPIENT REQUIREMENTS AND MONITORING.....	9
VI.	TRAINING AND TECHNICAL ASSISTANCE	10
VII.	PROGRAM AREA REVIEW	11
VIII.	ADA COMPLIANCE AND ACCOMMODATIONS	14
IX.	DATA COLLECTION AND ANALYSIS	15
X.	ENVIRONMENTAL JUSTICE (EJ) PROCEDURE	16
XI.	COMPLAINT PROCEDURE AND REPORTING	17
XII.	LIMITED ENGLISH PROFICIENCY	18
XIII.	MPO RECERTIFICATION REVIEW.....	20
XIV.	PUBLIC PARTICIPATION HEARINGS, MEETINGS, WORKSHOPS, ETC...	22
XV.	PUBLIC PARTICIPATION PLAN PERFORMANCE REVIEW AND ANALYSIS OF ATTENDEE FEEDBACK.....	27
XVI.	SUMMARY	29

APPENDICES

**APPENDIX A: TITLE VI – NON-DISCRIMINATION POLICY STATEMENT /
NOTICE TO BENEFICIARIES**

APPENDIX B: TITLE VI – NON-DISCRIMINATION ASSURANCES

APPENDIX C: MPO SELF-CERTIFICATION

**APPENDIX D: SUB-RECIPIENT COOPERATIVE AGREEMENTS AND
CONTRACTS**

APPENDIX E: COMPLAINT FORM

**APPENDIX F: PUBLIC PARTICIPATION PLAN - PUBLIC HEARING AND
COMMENT REPORT**

APPENDIX G: ATTENDEE FEEDBACK FORM

I. INTRODUCTION

This document was prepared to fulfill the following requirements: Chapter 23 CFR 200 Sub Chapter C – Civil Rights: Title VI Program and directives for the required reporting for sub-recipients of U.S. Federal aid and the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Title 49 - Transportation, Subtitle A: Office Of The Secretary of Transportation: Part 21—Non-discrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964. It was prepared utilizing Federal Transit Administration (FTA) Circular 4702 1B as directed by FHWA Divisional Offices.

For additional information on the Rhode Island Division of Statewide Planning (RIDSP), the Civil Rights Program, and our Title VI compliance please visit our website <http://www.planning.ri.gov/public-participation/title-vi-civil-rights.php>, or contact Benny L. Bergantino, Title VI Coordinator at benny.bergantino@DOA.RI.GOV 401-222-1755.

Overview

As a subrecipient of federal financial assistance from FHWA, RIDSP is required to fully comply with the Title VI of the Civil Rights Act of 1964, which provides:

“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.¹”

The U.S. Department of Justice (DOJ), as the coordinating agency for Title VI, implemented its Title VI program in 28 C.F.R. Part 42 and issued guidance in two main documents: the Title VI Legal Manual and *The Complaint Investigation Procedures Handbook*.

Title VI authorizes and directs Federal agencies to enact “rules, regulations, or orders of general applicability” to achieve the statute’s objectives. The U.S. Department of Transportation (DOT) implemented its Title VI program in 49 C.F.R. Part 21. FHWA’s regulations can be found in 23 C.F.R. Part 200.

Title VI is further defined by Executive Order 12898 - *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, and Executive Order 13166 - *Improving Access to Services for Persons with Limited English Proficiency*.

¹ Title VI served as the model for subsequent non-discrimination laws based on receipt of federal funding, including Title IX of the Education Amendments of 1972 (sex) and Section 504 of the Rehabilitation Act of 1973 (disability). However, each of these laws is accompanied by its own regulations and requirements and is not interchangeable with Title VI.

Discrimination Under Title VI

There are two types of discrimination prohibited under Title VI and its related statutes: disparate treatment (i.e. intentional discrimination) and disparate impact/effects.

Disparate treatment discrimination occurs when similarly situated persons are treated differently because of their race, color, or national origin. Disparate impact discrimination occurs when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of a protected group. In disparate impact, the focus is on the consequences of a decision, policy, or practice rather than the intent.

RIDSP's efforts to prevent such discrimination must address, but not be limited to, the unintended discriminatory consequences of its policies and procedures; the allocation of funds and prioritization of projects; the impacts, access, benefits, participation, services, contracting and training opportunities of a program; and the investigation of complaints.

Specific forms of discrimination prohibited are listed below:

- Denial of services, financial aid, or other benefits provided under a program;
- Distinctions in the quality, quantity, or manner in which a benefit is provided;
- Segregation or separation of persons in any part of the program;
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others;
- Differing standards or requirements for participation;
- Methods of administration that directly or indirectly, or through contractual relationships would defeat or impair the accomplishment of effective non-discrimination; and
- Discrimination in any activities or services related to a highway, infrastructure or facility built or repaired in whole or in part with federal funds.

Key Definitions

Beneficiary: Any person or group of persons (other than States) entitled to receive benefits, directly or indirectly, from any federally assisted program, (e.g. relocatees, impacted citizens, communities, etc.).

Disparate Impact: Discrimination that occurs when a facially neutral policy, procedure, or practice results in different or unequal treatment, and such policy or practice lacks a substantial legitimate justification. Under USDOT regulations, recipients may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin (49 C.F.R. 21.5(b)(2)).

Disparate Treatment: Intentional discrimination, or disparate treatment, happens when a recipient acts, at least in part, because of the actual or perceived race, color, or national origin of the alleged victims of discriminatory treatment.² Discriminatory intent need not be the only motive, but a violation occurs when the evidence shows that the entity adopted a policy at issue “‘because of,’ not merely ‘in spite of,’ its adverse effects upon an identifiable group.”³ While one must show that the recipient was motivated by an intent to discriminate, the recipient’s decision makers do not have to have acted in “bad faith, ill will or any evil motive....”⁴

Federal financial assistance and Federal-aid (49 C.F.R. 21.23(c)) includes:

1. Grants and loans of Federal funds;
2. The grant or donation of Federal property and interests in property;
3. The detail of Federal personnel;
4. The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
5. Any Federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

Local Public Agency (LPA) (23 C.F.R. 635.102): Any city, county, township, municipality, or other political subdivision that may be empowered to cooperate with the State Transportation Agency (STA) in highway matters.

Metropolitan Planning Organization (MPO): The policy board of an organization created and designated to carry out the metropolitan transportation planning process for each urbanized area with a population of more than 50,000 individuals. The Rhode Island Department of Administration’s Division of Statewide Planning serves as staff to the Rhode Island State Planning Council, which serves as the single statewide Metropolitan Planning Organization (MPO) for Rhode Island.

Minority: The Rhode Island Department of Transportation (RIDOT) uses the race and ethnicity categories established by the Office of Management and Budget in its October 30, 1997 Federal Register Notice: *Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity*. The race and ethnicity categories below are included in the definition of “Minority” provided by the Council on Environmental Quality *Environmental Justice Guidance Under the National Environmental Policy Act*, the U.S. Department of Transportation (USDOT) Order 5610.2(a), and FHWA Order 6640.23A.

² *Doe ex rel. Doe v. Lower Merion Sch. Dist.*, 665 F.3d 524, 548 (3d Cir. 2011).

³ *Pers. Adm’r of Mass. v. Feeney*, 442 U.S. 256, 279 (1979).

⁴ *Elston*, 997 F.2d at 1406 (quoting *Williams v. City of Dothan*, 745 F.2d 1406, 1414 (11th Cir. 1984)).

1. *American Indian or Alaska Native.* A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment;
2. *Asian.* A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam;
3. *Black or African American.* A person having origins in any of the black racial groups of Africa. Terms such as "Haitian" can be used in addition to "Black or African American;"
4. *Hispanic or Latino.* A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race. The term, "Spanish origin," can be used in addition to "Hispanic or Latino;" and
5. *Native Hawaiian or Other Pacific Islander.* A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Programs or Programs and Activities (49 C.F.R. § 21.23(e)): All the operations of any of the following entities, any part of which is extended Federal financial assistance:

1. (i) A department, agency, special purpose district, or other instrumentality of a State or of a local government; or (ii) The entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government;
2. (i) A college, university, or other postsecondary institution, or a public system of higher education; or (ii) A local educational agency (as defined in 20 U.S.C. 7801), system of vocational education, or other school system;
3. (i) An entire corporation, partnership, or other private organization, or an entire sole proprietorship—
 - a. If assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or
 - b. Which is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation; or
 (ii) The entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership, private organization, or sole proprietorship; or
4. Any other entity which is established by two or more of the entities described above.

Recipient (49 C.F.R. § 21.23(f)): Any State, territory, possession, the District of Columbia, or Puerto Rico, or any political subdivision thereof, or instrumentality thereof, any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal financial assistance is extended, directly or through another recipient,

including any successor, assignee, or transferee thereof, but such term does not include any ultimate beneficiary.

State Transportation Improvement Program (STIP): A statewide prioritized listing/program of transportation projects covering a period of ten-years, with four-year implementation, that is developed and formally adopted by an MPO consistent with the long-range statewide transportation plan, metropolitan transportation plans, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.”

Sub-recipient: A recipient entity that receives federal funding from a Primary recipient (e.g. RIDOT to carry out a federal program).

II. TITLE VI - NON-DISCRIMINATION POLICY STATEMENT / NOTICE TO BENEFICIARIES

RIDSP affirms its full commitment with both Title VI of the Civil Rights Act of 1964 and FHWA’s Title VI/Non-discrimination Program requirements, and pledges that **it does not and will not** exclude from participation in, deny the benefits of, or otherwise subject to discrimination any persons on the grounds of race, color, national origin, limited English proficiency, sex, age, disability, and income status from its programs or activities, whether or not such programs and activities are federally assisted.

(A copy of the Division’s Non-discrimination Policy Statement / Notice to Beneficiaries is presented in Appendix A and is also posted in a public space. Additional details on RIDSP’s non-discrimination policies and procedures including instructions on how to file a discrimination complaint may be found on our website in multiple languages at <http://www.planning.ri.gov/public-participation/title-vi-civil-rights.php>. It can also be obtained by contacting the Title VI Coordinator, Benny Bergantino via telephone (401) 222-1755, mail or email - benny.bergantino@doa.ri.gov).

III. TITLE VI - NON-DISCRIMINATION ASSURANCES

As a sub-recipient, RIDSP, the organization for Rhode Island’s single Metropolitan Planning Program (MPO), provided a signed [RIDSP Title VI Non-Discrimination Assurances](#) to the Rhode Island Department of Transportation (RIDOT). The most recent one is dated September 17th, 2024. *(See Appendix B).*

In addition, in accordance with Title 23 CFR 450.336, RIDSP as staff to the Rhode Island State Planning Council, MPO for the State of Rhode Island hereby certifies to FHWA and FTA that the transportation planning process is addressing the major issues in the metropolitan planning area and are being conducted in accordance with all applicable requirements set forth in the MPO Self-Certification *(see Appendix C)* which is always appended to the *Unified Planning Work Program (UPWP)*.

IV. TITLE VI - COORDINATOR RESPONSIBILITIES

The current Title VI Coordinator at RIDSP is Benny L. Bergantino, Principal Planner with 19 years of civil service experience.

The Title VI Coordinator is responsible for acting as the Division's single point of contact for Title VI Civil Rights and performing the tasks identified below:

- Monitoring progress, implementation, and compliance issues;
- Ensuring that no person is denied access to, or participation in MPO programs;
- Ensuring that full and fair participation is available to all potentially impacted communities in the decision-making process;
- Distributing Title VI information to MPO staff, committee members, sub-recipients and contractors, and the public; providing Title VI information on the MPO website, and providing Title VI training and/or materials upon request;
- Evaluating and ensuring that intergovernmental agreements or contracts with any subcontracting entities will include language that requires Title VI compliance including non-discrimination and environmental justice language;
- Overseeing the collection of demographic data;
- Identifying and reporting complaints to the RIDOT Civil Rights Office;
- Providing information on requests concerning civil rights responsibilities and compliance;
- Updating and maintaining civil rights reports and associated records;
- Assembling an annual review of RIDSP for Title VI compliance by the MPO staff, Title VI Coordinator and RIDOT. The existing procedures for the Title VI review include: (a) The Title VI Coordinator prepares an annual report that covers the subject matter pertinent to our status as a sub-recipient outlined in 23 CFR 200 and FTA Circular 4702. 1B dated 10/01/2012; (b) the annual report is provided to the RIDOT Civil Rights Office; and, (c) if necessary, there is a follow-up and/or comments and questions are addressed. Additional information is provided to RIDOT upon request.
- Managing Disadvantaged Business Enterprise (DBE) Program.

V. SUB-RECIPIENT REQUIREMENTS AND MONITORING

As a condition to receiving any Federal financial assistance from the FHWA through RIDSP, any and all consultants are subject to and must comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.); Non-discrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (49 C.F.R. Part 21) and other pertinent antidiscrimination directives that form the basis of State of Rhode Island Department of Transportation Title VI/Non-discrimination Program, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601); Federal-Aid Highway Act of 1973 (23 U.S.C. 324); Section 504 of the Rehabilitation Act of 1973 (29 U.S.C 794

et seq.) and 49 CFR Part 27; The Age Discrimination Act of 1975, as amended (42 U.S.C 6101 et seq.); The Civil Rights Restoration Act of 1987 (PL 100-209); Title II and III of the Americans with Disabilities Act (42 U.S.C 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38; Federal Highway Administration's Title VI Program and Related Statutes (23 CFR 200); Executive Order No. 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations; and Executive Order No. 13166, Improving Access to Services for Persons with Limited English Proficiency. Please also see signed Sub-recipient Title VI Assurances and Non-discrimination Provisions Form (*See Appendix B*).

Additionally, Title VI Non-Discrimination Assurances are placed into all RIDSP vendor and project consultant contracts, grants, and other cooperative agreements prior to award. Along with the Assurances being maintained by the Title VI Coordinator, Disadvantaged Business Enterprise (DBE) verification and utilization forms are also tracked. (*The status of these sub-recipient contracts, grants, and other cooperative agreements may be found in Appendix D*).

VI. TRAINING AND TECHNICAL ASSISTANCE

RIDSP staff participates in Title VI and non-discrimination training as it becomes available. An annual Title VI inter-office memorandum is sent to all staff with information about Title VI, the office's responsibilities under the law and corresponding regulations, and how to identify and report discrimination.

The most recent trainings in Title VI and EJ consisted of attendance at:

- Inclusive Transportation: A Manifesto for Repairing Divided Communities, sponsored by America Walks, October 25, 2023
- Measuring Disability: Exploring the Census Bureau's Proposed Changes and Policy Implications, sponsored by the Urban Institute (Webinar), February 22, 2024
- 2023 Update to the Equity Action Plan, sponsored by U.S. Department of Transportation (Webinar), February 26, 2024
- Meaningful Public Involvement in Transportation Decision-Making Training, sponsored by the US Department of Transportation, March 6, 2024
- Equity in Roadway Safety - Tools and Strategies for Equitable Design, sponsored by the Federal Highway Administration (Webinar), March 27, 2024
- Change Happens When You Have a Location-Based Equity Strategy, sponsored by ESRI (Webinar), April 3, 2024
- Marginalized Populations' Access to Transit, sponsored by the National Institute for Transportation and Communities, (Webinar) April 17, 2024

- When Driving is Not an Option: Designing Transportation for Involuntary Non-drivers Improves Accessibility for All, sponsored by Maryland Department of Planning (Webinar), June 13, 2024
- Viewing Resilience Planning Through an Equity Lens, sponsored by Maryland Department of Planning (Webinar), August 13, 2024

This office will request additional program assistance in EJ, data collection and analysis, and limited English proficiency (LEP) training from RIDOT and FHWA. Furthermore, the Title VI Coordinator will participate in all relevant local seminars as they are made available and make all program supervisors aware of these opportunities too. The Title VI Coordinator will work with the Civil Rights Specialists at FHWA and RIDOT to assure full compliance of its Title VI Program and with FHWA specific requirements and protocols to be emphasized during the training sessions for RIDSP.

VII. PROGRAM AREA REVIEW

The Rhode Island Division of Statewide Planning – Transportation Planning

RIDSP, acting as staff to the State Planning Council /Metropolitan Planning Organization (MPO), prepares and maintains plans for physical, economic, and social development of the state; encourages their implementation; and coordinates the actions of state, local and federal agencies and private individuals within the framework of the state's development goals and policies. The Transportation Planning Section is responsible for the development of the state's Long-Range Transportation Plan (LRTP), State Transportation Improvement Program (STIP), Unified Planning Work Program (UPWP) and Public Participation/LEP Plan. These important documents are detailed below.

Long-Range Transportation Plan

The State's [Long-Range Transportation Plan \(LRTP\) – Moving Forward Rhode Island 2040](#), is a multi-modal statewide transportation plan with a 20-year planning horizon. For the purposes of Federal coordination, the plan serves as a combined statewide transportation plan and metropolitan transportation plan. It outlines the goals, objectives, policies and strategies to guide transportation decisions toward improving the economic, social and environmental well-being of the state. The plan is updated every 5 years as the State of Rhode Island is currently classified as an air quality attainment area. The plan will be updated every 4 years should the MPO become an air quality non-attainment area. In addition, the LRTP is also adopted as an element of the State Guide Plan. As such, it becomes the basis for determining consistency of municipal comprehensive plans and other plans, programs and projects with the transportation policies of the State. The current LRTP, Moving Forward Rhode Island 2040, was adopted by the State Planning Council (SPC) on December 10, 2020. Moving Forward RI is a departure from the LRTPs of the past for three primary reasons:

1. It is data-driven and goals-oriented plan;
2. The goals are SMART – Specific, Measurable, Achievable, Relevant, and Time-Based; and
3. It incorporates a Bicycle Mobility Plan and the first-of-its-kind Transit Master Plan.

In addition, the current LRTP, Moving Forward Rhode Island 2040, has been established in coordination with other statewide transportation plans and processes including but not limited to the Highway Safety Improvement Program, the Strategic Highway Safety Plan, the State Asset Management Plan for the National Highway System (NHS), the Rhode Island Freight and Goods Movement Plan, the Transit Master Plan, and the Congestion Management Process / Plan.

The LRTP and accompanying reports can be found online at: <http://www.planning.ri.gov/planning-areas/lrtp/documents.php>.

In the FY2024 Unified Planning Work Program (UPWP), Project 6.3 detailed that the 2040 LRTP would be updated to a 2050 horizon and would include updated data and analysis, cost estimates and funding sources, short-term and long-term goals, objectives, strategies, and performance measurements that reflect federal transportation priorities. During FY2024 several municipal roundtables (6), public workshops (3 in-person/2 virtual), and stakeholder engagement sessions (10) were held. In addition, coordination meetings have been held with RIPTA, RIDOT, RIDEM, RIOER, Amtrak, MBTA, and RIAC. The LRTP update is designed to satisfy federal regulations related to a long-range statewide transportation plan and a metropolitan transportation plan. The schedule for implementation is estimated to be a 2.5-year planning process where staff have worked to update elements of the LRTP in-house in FY24, with the possibility of adding a consultant in FY25 and early FY26.

State Transportation Improvement Program

The [State Transportation Improvement Program \(STIP\)](#) is a list of transportation projects the State of Rhode Island intends to implement using State, Federal Highway Administration (FHWA), Federal Transit Administration (FTA) funding, and other various funding sources. The STIP reflects investment priorities established in the LRTP and covers a minimum period of four (4) years. The STIP is developed in close cooperation with RIDOT and RIPTA as they are the primary agencies responsible for the implementation of the projects listed in the STIP. The STIP is multimodal, and as such, it includes the following types of projects: bridge, drainage, maintenance, pavement, traffic safety, transit, and active transportation. Municipalities are solicited during the STIP development process and must each hold individual public hearings on their STIP project requests to the State. The STIP must be fiscally constrained for its first four years; meaning the list of projects in the STIP may not exceed the anticipated funding that is reasonably expected to be available over the first four-year timeframe. Unless otherwise provided for by federal requirements, projects utilizing federal funds must be included in a federally approved STIP. The SPC is responsible for adopting the STIP and adopted the most recent STIP on September 9, 2021, which covers the implementation of projects during fiscal years 2022 to 2031, with a constrained period of FFY22 to FFY25.

Unified Planning Work Program

The [Unified Planning Work Program \(UPWP\)](#) is a statement of the transportation planning priorities and planning projects to be carried out within a metropolitan planning area in a given fiscal year. In Rhode Island, the UPWP is collaborative effort between the MPO, RIDOT, and RIPTA. It includes a discussion of the planning priorities facing the State and USDOT, identifies work proposed for the next one-year period by major activity and task; and indicate who will perform the work, the schedule for completing the work, the resulting products, the proposed funding by activity/task, and a summary of the total amounts and sources of federal and matching funds. The MPO adopts a UPWP annually in May for the upcoming fiscal year.

Public Participation Plan

A critical component of statewide planning is public involvement. The Rules and Standards of the State Planning Council, specifically Rule 1.5 Metropolitan Planning Organization: Transportation Planning, details public involvement in the development of these key documents. In addition, RIDSP utilizes the [2024 Public Participation Plan \(PPP\)](#) for engaging in community outreach when preparing plans. The PPP continuously seeks to create opportunities for the public to participate in planning, reviewing, and implementing its transportation projects and programs. The MPO updates the PPP on an as needed basis.

In 2019, RIDSP implemented the following recommendations for improvements to RIDSP's PPP: expand the contemporary public involvement strategies; capture all public participation activities accurately and completely in the PPP, including outreach to low-income, minority, and LEP populations; increase its efforts to measure the effectiveness of its public involvement strategies; ensure all outreach activities, including nontraditional strategies, consistently address accessibility needs including Section 508, ADA, and LEP provisions; and, develop additional methods for reaching low income populations and minority populations, including both direct engagement with these populations and engaging with community organizations and other grassroots groups.

In the FY2023 UPWP, a Public Participation Plan (PPP) - Limited Update was completed in March 2024. The update takes a multi-faceted approach to public engagement that integrated opportunities to enhance early outreach and education, processes for incorporation of comments received, and the evaluation of additional public and stakeholder outreach and engagement. The virtual public engagement and implementation additions have been incorporated into the Information Dissemination, Targeted Consultation, and General Participation Strategies adopted in the 2019 Public Participation Plan. Lastly, in light of COVID-19, a Statement on Virtual Public Outreach in Response to COVID-19 was added to the PPP as an appendix to show how public outreach has evolved to include more online and virtual public opportunities.

VIII. ADA COMPLIANCE AND ACCOMMODATIONS

[The Americans with Disabilities Act \(ADA\) of 1990, as amended \(42 U.S.C. § 12101 et seq.\)](#), prohibits discrimination on the basis of disability, as well as [Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. § 701\) and Section 508 of the Rehabilitation Act of 1973 \(29 U.S.C. § 794d\)](#). Together they are federal anti-discrimination laws that protect persons with disabilities. The ADA and the Rehabilitation Act of 1973 provides comprehensive civil rights protections to any qualified person with a disability, and it forbids discrimination not only in government programs, benefits and services, but also in employment practices, access to public accommodations, and information and communications technology.

Some of the ways in which RIDSP maintains ADA Compliance and Accommodations are listed below:

- RIDSP maintains and continuously updates a website at www.planning.ri.gov. As of July 2022, the website was updated to be more 508 compliant with an interface that is more user-friendly on mobile devices and tablets. Visitors to the RIDSP website will find a wide range of transportation planning resources and data and information about the various transportation related functions and activities.
- RIDSP provides accessibility to key PDF documents for the visually impaired on our website at <http://www.planning.ri.gov/public-participation/ptd-for-visually-impaired.php>.
- Virtual Zoom Meetings have direct-captioning and transcription options.
- With prior notice, RIDSP will provide Certified American Sign Language (ASL) and Special Technologies such as Communication Access Real-time Translation (CART).
- RIDSP selects event locations that are accessible to individuals with disabilities. Any individual with physical or sensory impairments requiring assistance for a reasonable accommodation to participate, or any individual requiring the services of a spoken language interpreter, was instructed by the hearing notice as to how to request accommodation posted on the RIDSP website and physical postings.
- RIDSP is represented on RIPTA's Accessible Transportation Advisory Committee (ATAC)
- RIDSP is represented on RIPTA's Human Services Transportation Coordinating Council (HSTCC)
- RIDSP has initiated the coordination with RIDOT to engage municipalities in an assessment of municipal compliance with the ADA. These municipal ADA assessments are meant to gauge whether or not municipalities are in compliance with RIDOT Section 504 Regulations in 49 CFR Part 27 and if they are not, provide assistance, training or resources needed to incrementally move municipalities closer to compliance. According to the ADA Title II, all State and local governmental agencies shall provide access to its facilities, programs, and

services for persons with disabilities. As part of the ADA regulation requirement, a self-evaluation shall be conducted to ensure local governments identify the facilities, programs, and services that need modification or relocation to provide access and equal opportunities for people with disabilities within their jurisdiction. For state and local governments that employ 50 or more individuals an ADA Transition Plan is required and must be in place for recipients of U.S. Department of Transportation financial assistance (Section 504 regulations in 49 CFR Part 27).

IX. DATA COLLECTION AND ANALYSIS

RIDSP's sources of data collection include the American Community Survey 5-year estimates and US Census Bureau Decennial Census.

RIDSP periodically collects and conducts analysis of data regarding community boundaries for the determination of urban and rural delineations for the transportation funding formulas and highway functional classification. The collection of data pertaining to racial ethnic makeup, and income levels is provided by the US Census. Community services such as schools, hospitals, employment centers and shopping centers are often included in comprehensive plans submitted to the Division for review. The collection of data on the disabled population is covered in the American Community Survey but is also a function carried out by other departments and authorities such as the RI Department of Health and RI Public Transit Authority.

Exit surveys with attendee feedback from public hearings and workshops are conducted by RIDSP at public hearings and workshops. Survey results from several events are analyzed and used to enhance public engagement and outreach.

In FY 2016, at the request of FHWA, RIDSP developed new metrics for a Transportation Equity Benefit Analysis (TEBA) to reflect all Title VI protected and some additional disadvantaged area populations. These new metrics and TEBA method were used in the analysis of the FFY 2022-2031 STIP which may be reviewed at:

<http://www.planning.ri.gov/documents/tip/2021/Section%205-Transportation%20Equity%20Benefit%20Analysis.pdf>

As a result of the 2018 Recertification Review by the Federal Highway Administration and the Federal Transit Authority, FHWA and FTA recommended that, to be consistent with Title VI, the MPO should expand the data collection and analysis to specifically include White, Black or African American, American Indian and Alaska Native, Asian and Hispanic or Latino. The analysis performed compared the allocation of investments among the Title VI protected classes and conducted a burdens and benefits analysis. This recommendation was identified under Activity 9: Planning Information in the *FY 2019 Unified Transportation Work Program*. This activity was completed in FFY 2021.

X. ENVIRONMENTAL JUSTICE (EJ) PROCEDURE

Rhode Island's MPO is committed to environmental justice and the equitable distribution of transportation projects and investments by ensuring non-discrimination in the state's transportation programs and its planning procedures and processes. Currently, RIDSP has two different methods for identifying trends or patterns of discrimination in two major program areas. The two methods are found in the State Transportation Improvement Program (STIP) and the Long-Range Transportation Plan (LRTP), *Moving Forward Rhode Island 2040*.

RIDSP worked with RIDOT and FHWA to develop a Transportation Equity Benefit Analysis, or TEBA. The TEBA provides a transportation equity analysis, bridging select population group (SPG) data with STIP project locations and investments to assess equitable distribution of transportation resources and access to public transit. The Federal fiscal year (FFY) 2022-2031 STIP contains a demographic profile with maps and charts of the MPO area that includes an identification of locations of minority populations in the aggregate and a description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

For a more detailed look at the new non-discrimination procedures and related Title VI demographics identification including mapping and results of the analysis please see the FFY 2022-2031 STIP which may be viewed at <http://www.planning.ri.gov/planning-areas/transportation/tip-2022-2031.php>

The LRTP, *Moving Forward Rhode Island 2040*, utilized a benefits and burden analysis for two key Title VI and Environmental Justice (EJ) transportation program areas, air quality and transit. The methodology of quantifying burdens and benefits on a macro-level was accomplished utilizing the "Location Quotient" method. Trends or patterns along with possible strategies to eliminate discriminatory affects with mitigation plans or measures are addressed either within the LRTP, in its proposed capital projects, or with changes to overall program area policy at a higher management level. For example, possible recommendations were included within the LRTP to mitigate burdensome discriminatory affects. Recently, the Title VI and EJ analysis was updated with the development of a the new LRTP as detailed in the Program Area Review section. The update builds on the previous method of analysis and uses the most current FHWA and FTA guidance as outlined in section VIII. Data Collection and Analysis. The updated LRTP was adopted on December 10, 2020.

For a more detailed look at the LRTP Social Equity: Title VI and Environmental Justice Analysis please see <http://www.planning.ri.gov/documents/LRTP/LRTP-app/AppendixK.pdf>

In the FY 2023 and FY 2024 UPWPs, RIDSP programmed a "Social Equity Data Platform". The purpose of this platform is to better align social equity policies,

decisions, and outcomes into our planning process as detailed in the Justice40 federal initiative. This work includes the development of spatial data clearinghouse for social equity indicators in various categories such as transportation, health, environment, and housing for underserved and marginalized groups, including low-income and communities of color. As part of this project, RIDSP has reviewed other DOT and MPO social equity data platforms and tools to develop a set of best practices that can be implemented and deployed in Rhode Island. Public, stakeholder and working group feedback has been provided and will be continued as we move through this project.

In the future, deployment can include but is not limited to the development of Social Equity Performance measures for the STIP, a social equity online dashboard to track and monitor performance towards the equity goals, and an Equity Index Analysis that can be integrated into the E-STIP's SWIFT project intake application. These items under the Equity Platform will better inform planners and decision makers in a quantitative way and help to protect these identified communities, as well as implement plans that deliver projects better suited to these areas. The outcome of this work is the final, publicly accessible Social Equity Data Platform and associated data for download. This task has involved staff from other groups within RIDSP as well as other state agencies including but not limited to RIDEM, RIDOH, and RIDOT to ensure that equity and social justice considerations are integrated into all outreach and project development platforms.

XI. COMPLAINT PROCEDURE AND REPORTING

As a sub-recipient of USDOT financial assistance, RIDSP has the following Title VI complaint procedure in place and will follow this complaint procedure and process that meets Title VI requirements.

Submit complaint: Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, from RIDSP during the administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint form (*see Appendix E*). Complaints may be submitted in writing to the Title VI Coordinator using the [Title VI/Civil Rights Complaint Form](#) or [Title VI/Civil Rights Complaint Form for other Languages](#). The complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred.

Submit written complaints to:

Benny Bergantino, Title VI Manager
Division of Statewide Planning
235 Promenade Street, 2nd Floor, Suite 230
Providence, RI 02908
Benny.Bergantino@DOA.RI.GOV

Complaints must be in writing and signed by the complainant and/or the complainant's representative. Complaints should set forth as complete as possible, the facts and circumstances surrounding the claimed discrimination and include the following information:

- Name, address, and telephone number of the complainant.
- A written statement of the complaint, including the following details:
 - (a) Basis of complaint (i.e., race, color, national origin or sex, disability, and age).
 - (b) The nature of the incident that led the complainant to feel discrimination was a factor.
 - (c) A detailed explanation of the alleged discriminatory act(s).
 - (d) The date or dates on which the alleged discriminatory event or events occurred and any witnesses.
 - (e) If applicable, name(s) of alleged discriminating official(s).
- Other agencies (state, local or Federal) where the complaint is also being filed (optional).
- Complainant's signature and date.

Review and Response: Upon receipt of the complaint, the Associate Director of RIDSP shall review and forward the complaint to the Rhode Island Department of Transportation Title VI Office.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Submission of Complaint to the U.S. Department of Transportation: In accordance with Federal Transit Administration (FTA) Circular 4702.1B, Chapter IX, a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1B, which outlines the complaint process to the Department of Transportation, may be obtained online at www.fta.dot.gov. Paper copies of the circular may be obtained by calling FTA's Administrative Services Help Desk, at 202-366-4865.

RIDSP's non-discrimination policies and procedures, including instructions on how to file a discrimination complaint, may be found at our website <http://www.planning.ri.gov/public-participation/title-vi-civil-rights.php>

As of September 30, 2024, there are no known Title VI complaints, investigations, lawsuits, or other reports of discrimination actions by RIDSP since submission of our last report.

XII. LIMITED ENGLISH PROFICIENCY PLAN (LEP)

RIDSP, as a sub-recipient of federal financial assistance, must comply with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency and 70 Fed. Reg. 74087 - Dec. 14, 2005, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, which require

that reasonable steps are taken to provide access to programs and services to persons with Limited English Proficiency (LEP).

As part of its compliance with Title VI, RIDSP must ensure that Limited English Proficient (LEP) individuals have meaningful access to Division programs and activities. As such, the Division has developed procedures—in accordance with USDOT guidance—to effect compliance regarding LEP.

LEP individuals are those individuals for whom English is not their primary language and have a limited ability to speak, read, write, and understand English. Failure to provide meaningful access to such individuals may result in national origin discrimination, which is prohibited by Title VI. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by RIDOT to people's lives; and
4. The resources available to RIDSP and costs.

In 2023, RIDSP revised the [LEP Plan](#). To carry out this effort, an updated four-factor analysis was performed, utilizing USDOT methodology and guidance, along with updates to the LEP populations and maps.

The LEP reflects the latest lead times for procuring both interpreters and translation service. There is currently a minimum of 5 days requested for interpreters, and a 2 day turn around for written translations for a 1-page document. The LEP Plan details the latest LEP related procurement procedures as utilized in the latest Master Price Agreement.

RIDSP's website is equipped with Google Translate to translate text into various other languages. Below is a list of Public Participation and Civil Rights webpages and the detailed information provided on each.

- [Public Participation](#)– Provides various ways RIDSP conducts its public outreach and participation program particularly related to the following: Long Range Transportation Plan (LRTP), State Transportation Improvement Program (STIP), Unified Planning Work Program, and 2024 Public Participation Plan (PPP).
- [Title VI of the Civil Rights Act & Environmental Justice](#) – Discusses how RIDSP works to meet Title VI requirements. In addition, it provides the Division's: Title VI Plan/Report; Nondiscriminatory Assurances; Notice to Beneficiaries and complaint procedures.

- [Federal Protections](#) – Discusses key pieces of legislation and executive orders heavily influence how RIDSP conducts public engagement including public meetings, and the distribution of materials and communications.
- [Language Access & Translation Services](#) – Provides information on improving access to services for persons with limited English proficiency and the translation services available through RIDSP.
- [Documents Accessible for the Visually Impaired](#)– Provides key documents in a plain text format for the visually impaired.

XIII. MPO RECERTIFICATION REVIEW

Every four years, an MPO must be certified by FHWA and FTA. To be certified means an MPO has met the federal transportation planning process requirements: this allows an MPO the ability to continue receiving federal transportation dollars. Through a series of virtual meetings on February 8, 9, and 10, 2022, the FHWA and FTA assessed Rhode Island’s transportation planning process. Representing the Rhode Island transportation planning process were staff from RIDSP (Rhode Island’s MPO staff), RIDOT and the Rhode Island Public Transit Authority (RIPTA). In addition, opportunities for public comment were provided via a virtual State Planning Council meeting on February 10, 2022, and a Transportation Advisory Committee meeting on February 17, 2022. The MPO was recertified on April 21, 2022. The review report is located at <https://planning.ri.gov/sites/g/files/xkgbur826/files/2022-05/4-21-2022-mpo-recert.pdf>. The Public Participation and Title VI recommendations are detailed below with RIDSP’s responses.

Public Participation Recommendation - RIDSP should ensure that the effectiveness of the Public Participation Plan (PPP) is evaluated on a regular basis and that the evaluation process is transparently coordinated with stakeholders.

RIDSP Response –As a result of the recertification recommendation RIDSP has completed a PPP Limited Update that addresses the shifting framework of public participation meetings and provide innovations for public comment intake. This update provides RIDSP an opportunity to revisit the effectiveness of the PPP and better ensure that the PPP is evaluated on a more regular basis.

Public Participation Recommendation - While the planning partners have taken a multi-faceted approach to public engagement in their respective areas of responsibility, opportunities to enhance early outreach and education, processes for incorporation of comments received, and additional public and stakeholder outreach and engagement opportunities should be evaluated. The MPO should work to engage neighborhood organizations in the planning process as well.

RIDSP Response – Within the PPP Limited Update, RIDSP is providing more opportunities for early engagement by offering more frequent meetings at different times and locations including virtual sessions. This provides RIDSP a chance to better implement public comments. Lastly, RIDSP projects have engaged with the Health Equity Zones, AARP, local farmers markets, and other neighborhood organizations, as detailed in section XIV. Public Participation.

Title VI/LEP Recommendation - It is recommended that the MPO explore opportunities to provide summary documents of the MPO’s key documents in all Safe Harbor languages. The MPO must not solely rely on Google Translate plug-in on its website, as this tool is not an effective translation method.

RIDSP Response – RIDSP is in the process of posting translated PDFs for the complaint form on the MPO website. In addition, the State has revamped websites for various departments, including RIDSP, which provides translation via Google translate but in a more accessible way than years prior. In future RFPs for key documents, RIDSP will look to include translations to Safe Harbor languages as part of contracts moving forward.

Title VI/ADA Recommendation - The MPO will need to coordinate with RIDOT to develop a municipal ADA assessment, for which a summary of the results should be sent to FHWA/FTA annually.

RIDSP Response – On July 17th, 2023, RIDSP met with the RIDOT ADA Coordinator and staff associated with municipal ADA implementation. During this meeting, RIDOT indicated that ADA assessments are done on a case-by-case basis every year. Depending on which municipalities submit projects to RIDOT, ADA assessments are carried out with surveys to determine if the applicant municipalities are meeting ADA requirements. Understanding the existing process, RIDSP and RIDOT discussed the potential of changing this system to utilizing an annual survey that reaches out to all municipalities. After these surveys are completed, interested municipalities could then decide to participate in an instructor lead training for municipal designees/ADA coordinators so they would both come into compliance with designating an ADA coordinator and become eligible for future federal grant awards. RIDOT staff indicated that they could share some instructor information with RIDSP to begin this process and gauge municipal interest.

Title VI/ADA Recommendation - The MPO should continue to assess how it communicates with people with disabilities. Alternative methods of communication such as TTY (Teletypewriter), TDD (Telecommunication Device for the Deaf), and relay services that will allow individuals with hearing-impairment to communicate through the telephone to receive information from the MPO. In addition to plain text documents RIDSP makes available to the visually impaired, large print, braille and electronic information must be made available upon request for persons with visual disabilities, to meet compliance with Section 508.

RIDSP Response – RIDSP will continue to offer services to those with disabilities on a case-by-case basis.

**XIV. PUBLIC PARTICIPATION
HEARINGS, MEETINGS, WORKSHOPS, ETC...**

During FFY2024 there was one (1) State Planning Council public hearing held before the Transportation Advisory Committee (TAC).

1. Public Participation Plan

On January 30, 2024, there was a public hearing held for the adoption of the Limited Update to the Public Participation Plan at the Warwick Public Library. The event was attended by one member of the public.

There were also two one-hour virtual listening sessions held on January 23, 2024. The 12:00pm listening session was attended by 3 members of the public: the 6:00pm listening session was attended by 2 members of the public.

During the 45-day public comment period, three formal public comments were received across the two virtual listening sessions; four formal written public comments were received; and a joint public comment letter was submitted on behalf of 12 organizations. *(The Public Hearing and Comment Report is attached as Appendix F for complete transparency).*

2. Moving Forward RI 2050 - Long Range Transportation Plan

The 2050 Rhode Island Long-Range Transportation Plan and Metropolitan Transportation Plan seeks to build upon Moving Forward 2040 by performing a limited update of the plan in accordance with federal law (49 USC 5303 and 5304) and the U.S. Department of Transportation regulations (23 CFR 450; 23 USC 134 and 135). This plan is required to be updated every five years and the vision integrates strategic direction of supporting modal plans that are updated at varying intervals. Work on this limited update began in the fall of 2023, with the goal of having the plan approved by December 2025. The table presented below details the public engagement performed during FFY 2024.

Moving Forward RI 2050 Events			
Public Workshops	Date	Attendees	Comments Received
Newport Public Library, Friends Room, 300 Spring Street, Newport	6/24/24	11	
Pawtucket Public Library, Campbell Auditorium, 13 Summer Street, Pawtucket	7/9/24	9	

West Warwick Public Library, Nash Room, 1034 Main Street, West Warwick	7/16/24	4	
Virtual Webinar (2 workshops)	7/22/24	16	
<i>Total</i>		40	383
Municipal Roundtables	6/7/24, 6/18/24, 6/25/24, 7/11/24, 7/12/24, 7/25/24	16 <i>Planners</i>	198
Tabling			
Health Equity Zone Learning Community	7/29/24	32	
Woonsocket Farmers Market	9/10/24	21	
Neutaconkanut Farmers Market	9/16/24	12	
<i>Total</i>		65	
Stakeholder Events			
Freight Committee	5/29/24	20	
Greater Newport Chamber of Commerce Advisory Committee	6/6/24	19	
League of Cities and Towns	7/17/24	15	
Pawtucket Senior Center	7/19/24	15	
Accessible Transportation Advisory Committee	8/1/24	18	
Woonasquatucket River Watershed Council	8/7/24	19	
Providence Sustainability Commission	8/19/24	15	
RI Human Services Transportation Coordinating Committee	9/9/24	15	
RI AARP Volunteers Meeting	9/11/24	22	
<i>Total</i>		158	284
<i>Total Comments Received</i>			865
<i>Total Survey Responses</i>			521
<i>Total Comments Received Plus Survey Responses</i>			1,386
Transportation Advisory Committee	4/25/24	25	
Freight Advisory Committee	5/29/24	27	

3. Complete Streets Plan and Design Guide

In its preparation of a Statewide Complete Streets Plan and Design Guide, the Rhode Island Division of Statewide Planning (RIDSP) determined stakeholder engagement should begin early in the plan development process. A cross-section of municipal, community, and business interests participated in focus group sessions held from June 27, 2024, to July 26, 2024.

Complete Streets Plan and Design Guide Events		
Focus Groups	Date	Participants
Equity	6/27/24	3
Environmental	7/9/24	8
Economic Development and Tourism	7/16/24	5
Municipal	7/18/24	4
Latinx Newport	7/22/24	2
Pedestrian-Bicycle-Transit	7/23/24	5
Education	7/25/24	5
Health Group	7/26/24	6
<i>Total</i>		38
Transportation Advisory Committee	6/27/24	27
Technical Committee	9/13/24	20

4. Social Equity Platform

In the wake of the Justice40 initiative, RIDSP joined with several different state agencies to build the online Platform initiative to better align our understanding of social equity data. The Social Equity Platform pulls together more than 30 spatial data indicators on public health, environmental justice, socioeconomics, and transportation into one easy to use, publicly accessible platform. The platform is intended to increase social equity data transparency and to overlay the unique justice issues communities across the state face.

Social Equity Platform Events		
Virtual Webinars and In-Person Presentation	Date	Attendees
Health Equity Institute Community Office Hours - Webinar	3/28/24	21
Social Equity Platform - Listening Session #1	4/24/24	26
Social Equity Platform - Listening Session #2	4/24/24	2
<i>Power of Place Summit</i> sponsored by GrowSmart RI - Providence Convention Center, 1 Sabin Street, Providence	5/3/24	19
<i>May 2024 HEZ Learning Community</i> sponsored by Health Equity Zones Initiative - Rhode Island College, 600 Mount Pleasant Avenue, Providence	5/14/24	35
RIDOH Epidemiologists and Evaluators Meeting – Webinar	5/15/24	23
Total		126

Transportation Advisory Committee	2/22/24	29
State Planning Council	5/9/24	28

5. Resilient Route 114 Plan

RIDSP, in partnership with the Towns of Barrington, Warren, and Bristol, held two Resilient Route 114 Plan Regional Public Workshops. Members of the public were invited to share their concerns and ideas regarding Route 114’s vulnerability to coastal flooding and to consider alternatives. RIDSP and its Consultant, Fuss & O’Neill, made a brief presentation on the Plan and the work to date. Attendees were then invited to view maps of projected future flooding along the transportation corridor and provide input and ideas to staff on proposed mitigation strategies.

Resilient Route 114 Plan Events		
Public Workshops	Date	Attendees
Resilient Route 114 Regional Public Workshop, Bristol Town Hall, 10 Court Street, Bristol	6/4/24	18
Resilient Route 114 Regional Public Workshop, Barrington Town Hall, 283 County Road, Barrington	6/6/24	11
<i>Total</i>		29

6. Historical District CAMP Training

The staffs of the Rhode Island Historic Preservation Heritage Commission and RIDSP worked to engage and schedule the Commission Assistance and Mentoring Program (CAMP®) training offered by the National Alliance of Preservation Commissions (NAPC) for municipal historic district commissions that meet the requirements of RIGL 45-70-3, *Continuing Education for Local Planning and Zoning Boards and Historic District Commissions* (HDCs). The project provides in-person and on-line training through CAMP®. The goal of providing CAMP® is to provide high-quality, engaging, and informative training to historic district commissions in Rhode Island.

Historical District CAMP Training Events		
Educational Trainings	Date	Attendees
In-person, Triple AAA - 65 Centerville Road, Warwick	10/28/23	35
Virtual ZOOM Training	1/30/24	33
<i>Total</i>		68

7. Metro Connector Study - RIPTA

Transit Forward RI 2040, the transit component of State Guide Plan 611 (Moving Rhode Island Forward 2040 or the Long-Range Transportation Plan) identifies two corridors that exhibit high levels of transit demand to warrant the development and implementation of fixed guideway high-capacity transit service: bus rapid or light rail transit. These prospective corridors, running from Cumberland/Central Falls to CCRI-

Warwick and Rhode Island T.F. Green International Airport via Downtown Providence, present the greatest opportunities to leverage federal funding through the Federal Transit Administration’s Capital Investment Grant (CIG) program. This grant supports RIPTA’s efforts to analyze the alternatives, determine locally-preferred alternatives, and carry out a robust and equitable public engagement process. The public engagement to date is detailed below.

Metro Connector Study Events		
Open Houses	Date	Attendees
Pawtucket Library, 13 Summer Street, Pawtucket	9/24/24	24
West Warwick Public Library, 1043 Main Street, West Warwick	9/25/24	4
Joseph A Doorley Jr. Municipal Building, 444 Westminster Street, Providence	9/26/24	18
Community College of Rhode Island, Knight Campus, 400 East Ave, Warwick	9/30/24	2
<i>Total</i>		48

A summary of outreach efforts for the hearings, meetings and workshops in FFY 2024 are listed below:

- Notices were posted on RIDSP and Secretary of State websites in English and Spanish. In addition, informational flyers were made available at event locations in English.
- On August 1, 2020, RIDSP contracted with a web-based public comments management software company, SmartComment. The SmartComment software provides the public with easy comment entry, interactive mapping, and a comment dashboard to provide efficient management of comments and easily display comment analytics for ‘comment tracking’. SmartComment gives staff the ability to take an automated approach to something that was done manually before to increase productivity and efficiency. SmartComment was founded to vastly improve the public comment process for environmentally impactful projects, rule changes, permit applications, and for agencies and organizations that need comprehensive comment support. RIDSP continues to utilize this platform regularly and works with RIDEM and OER to manage public input.
- Direct email notification was sent to the over 1,400 planning and transportation contacts in RIDSP’s database. This database includes: all RI senators and representatives; state agencies, transportation providers, city/town council members; municipal CEOs, town and public works directors, planners, and transportation stakeholders; environmental justice agencies; universities; and members of the public who have signed up for public notifications.
- The RIDSP monthly e-newsletter was utilized to provide notice for events and sent to more than 240 interested parties.

- Event locations selected were accessible to individuals with disabilities. Any individual with physical or sensory impairments requiring assistance for a reasonable accommodation to participate, or any individual requiring the services of a spoken language interpreter, was instructed by the hearing notice as to how to request accommodation posted on the RIDSP website and physical postings.
- * Translation service for the limited English proficient public was made available, as needed, for public hearing, meeting and workshop notices, informational event flyers, and attendee feedback surveys.

XV. PUBLIC PARTICIPATION PLAN (PPP) PERFORMANCE REVIEW AND ANALYSIS OF ATTENDEE FEEDBACK

RIDSP’s PPP was updated by the MPO in FFY2024. It represents an ongoing strategy of public outreach for the SPC’s plans and programs. To maintain a successful public participation program, the RIDSP and the SPC periodically evaluate what works and what does not work in the public participation process and evaluation of attendee feedback survey questionnaires (rev. 2024) are conducted or as part of an annual review. *(A copy of the Attendee Feedback survey questionnaire can be found in Appendix G).*

An evaluation of attendee feedback survey questionnaires for FFY2024 was performed as 60 attendee feedback survey questionnaires (8 online submissions) were collected.

Survey results were compiled and presented using three (3) performance measures to gauge the effectiveness of the MPO’s public involvement activity. The three performance measures evaluated include:

1. Information Dissemination

- Were the participants at the events satisfied with the availability of information?
- Was the information provided in a timely manner?
- Was “noticed” to actively participate effective?

RIDSP Evaluation Results:

Of the respondents, 100% of the attendees surveyed were satisfied with the information provided and that it was delivered in a timely fashion. The two prime sources that served as forms of notification of the events were email and other. 54.1% of attendees surveyed identified email as the prime source of notification. 32.7% of attendees surveyed identified ‘Other’ (comprised of Facebook, Newspaper, and Newsletter) as their notification source.

2. Consultation

- Was there meaningful information and dialogue exchanged and did the outreach achieve desired outcomes, such as was the event beneficial, and did it provide information that was helpful to the participant?
- Did the participants believe the event was at a time and location that was convenient?
- Is the public participation more demographically balanced, such as more participation of the underserved and minority populations?

RIDSP Evaluation Results:

Of the respondents, 100% of attendees surveyed felt that the events were beneficial and provided information that was helpful.

Of the respondents, 98.3% of attendees surveyed felt that the events were held at a convenient time and location.

In terms of being demographically balanced, the table below compares the racial composition of those that completed the Attendee Feedback Survey and the racial composition of the RI population detailed in the 2023 ACS 1-Year Estimate.

Race	Racial Composition (Based on Attendee Feedback Response)	Racial Composition of RI Population (2023: ACS 1-Year Estimate – DP05)
White	98.3%	79.8%
Black/African American	1.7%	10.8%
American Indian/Alaska Native	0.0%	2.5%
Asian	0.0%	4.8%
Native Hawaiian/Pacific Islander	0.0%	0.3%
Other	0.0%	17.1%

While the percentages are not demographically balanced, we are exploring options for demographic diversity and the administration of the attendee feedback survey possibly with a QR Code that would allow for the survey to be completed on the go. It is important to note that RIDSP attended many demographically diversified events as a ‘guest’. In these circumstances, this would have meant that attendee feedback surveys were not distributed and suggest that RIDSP did not have control of many factors (e.g. date, locations, times, etc.) which are normally fields reported on to FHWA. Piggybacking off existing events as a ‘guest’ helps us to meet residents where they are or where they will be and helps us get the word out on the projects

we are working on. When input has been pursued in this manner, there is increased attendance/participation particularly for lower-income and non-white audiences.

Additional Attendee Feedback Survey data of interest:

- 98% of attendees were non-Hispanic.
- Over 40% of attendees were 65 years and older.
- 86% of attendees had incomes greater than \$50,000.
- Almost all attendees identified that their primary language spoken at home was English, except for one who indicated ‘Dutch’ as their native language.
- 14% of attendees identified themselves as “disabled”.
- The male to female attendee ratio was 44.6% to 51.8%, respectively. (3.6% identified as non-binary).

3. Stakeholder Participation

- Were the participants satisfied with the opportunity to offer input?
- Did they believe their opinions were heard and mattered?

RIDSP Evaluation Results:

Of the respondents, 100% attendees surveyed were satisfied with the opportunity to offer input and that their opinions were heard and mattered.

XVI. SUMMARY

This document was prepared to fulfill requirements of Title VI of the Civil Rights Act of 1964. Title VI Program requirements and directives is required reporting for sub-recipients of U.S. Federal aid and the U.S. Department of Transportation. This report is updated annually, and documents efforts taken by the Rhode Island MPO to comply with FHWA’s Title VI/Non-discrimination Program requirements. If there are any questions about the content of this report, please contact, the Title VI Coordinator, Benny Bergantino via telephone (401) 222-1755, mail or email - benny.bergantino@doa.ri.gov.