

**MaineDOT**

*Integrity • Competence • Service*

# Maine Department of Transportation

## TITLE VI NONDISCRIMINATION FTA IMPLEMENTATION PLAN 2020 – 2023

**Submission Date:  
October 1, 2023**

Submitted by: Sherry Y. Tompkins, Director, Civil Rights Office  
October 1, 2023

## TABLE OF CONTENTS

---

INTRODUCTION .....	4
Title VI Plan Overview .....	7
Title VI/EJ Policy Statement and Authorities .....	8
Organization and Staffing of Civil Rights Office (CRO).....	10
TITLE VI MONITORING AND REVIEW PROCESS.....	13
CHAPTER III REQUIREMENTS.....	26
1. Title VI Public Notice .....	26
2. List of Title VI Investigations, Complaints or Lawsuits .....	35
3. Public Participation Plan .....	41
4. Language Assistance Plan.....	51
5. Advisory Committees .....	68
6. Ensuring Subrecipient Assistance and Compliance with Title VI .....	70
7. Title VI Equity Analysis for Construction Projects .....	72
CHAPTER V REQUIREMENTS .....	73
A. General Requirements, Section 4 of Chapter III. ....	73
B. Requirements for Transit Providers, Chapter IV.....	73
C. Demographic Profile of Minority Populations .....	73
D. Demographic Impacts of FTA/MaineDOT Funding .....	81
E. Disparate Impacts Analysis.....	87
F. Description of Statewide Transportation Planning Process that Identifies Transportation Needs of Minority Populations.....	88
G. Procedures MaineDOT uses to Pass-through FTA Financial Assistance in Non- discriminatory Manner .....	89
H. Description of Procedures MaineDOT uses to Assist Potential Subrecipients .....	92
Appendix I – Title VI Nondiscrimination Assurances	
Appendix II – 2023 Four Factor Analysis	
Appendix III - FTA Compliance Subrecipient Self-Certification Checklist	
Appendix IV - U.S. Census Primary Language List	
Appendix V - "How to Work with a Telephone Interpreter" and Language Interpretation Cards	

**Page intentionally blank**

## INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI 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 subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

During the Obama Administration, the Federal Transit Administration ("FTA") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP").

In accordance with Title VI of the Civil Rights Act of 1964 and other authorities, the Maine Department of Transportation (MaineDOT) is committed to ensuring that the fundamental principles of equal opportunity are upheld in all decisions involving our employees, our subrecipients, and our contractors/consultants, and to ensuring that all members of the public are afforded access to our programs and services. To that end, no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MaineDOT program or activity on the basis of race, color, national origin, or Limited English Proficiency (LEP) status.

MaineDOT is a recipient of federal funds from the U.S. Department of Transportation modal agencies, including the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). All recipients of federal funding must comply with the requirements of Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, regulations and authorities.

The contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency (LEP) and other statutes and authorities that prohibit discrimination in any federal assisted program or service.

Under the Civil Rights Act of 1964 and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the US Department of Transportation (US DOT), MaineDOT has an obligation to ensure that the objectives of the MaineDOT Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color and national origin;
- Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including adverse social and economic effects of programs and activities on minority populations and low-income populations;
- Ensure the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;

- Ensure that persons with Limited English Proficiency (LEP) have meaningful access to programs and activities that are administered by recipients and subrecipients; and
- Ensure a program is in place for correcting any discrimination, whether intentional or unintentional.

[49 CFR 21.9 \(b\)](#) requires that recipients and subrecipients record and retain certain information and submit information to FTA as necessary or required. MaineDOT and its subrecipients shall fulfill this requirement by submitting compliance reports once every three (3) years. References to the information that is required by the US DOT can be found throughout this document.

This Implementation Plan describes how MaineDOT accomplishes nondiscrimination in the delivery of its federally assisted programs, services, and activities. The Plan includes the structure of MaineDOT's Title VI program as well as the policies, procedures, and practices MaineDOT uses to comply with nondiscrimination requirements. The Plan is intended to be a living document, regularly monitored and updated by MaineDOT to reflect the program as it changes and grows.

Anyone who wishes to provide input into MaineDOT's Title VI Program Implementation Plan is encouraged to contact the Director of the Civil Rights Office, Sherry Y. Tompkins, at (207) 624-3066 or [sherry.tompkins@maine.gov](mailto:sherry.tompkins@maine.gov), or by writing the Civil Rights Office at MaineDOT Headquarters, 16 State House Station, Augusta, ME 04333-0016.

MaineDOT, in accordance with Federal Transit Administration (FTA) guidance, has developed and adopted this plan to ensure that FTA funding received and distributed by MaineDOT is done so in an equitable and fair manner to provide transit opportunities throughout the State.

MaineDOT distributes funds throughout the State of Maine. It does not provide direct fixed route service to Maine citizens. Because of this, MaineDOT has followed the guidance in FTA C 4702.1B, Chapters III and V.

## NOTICE

**If the information contained in this Title VI Nondiscrimination Plan is needed in another language, please contact the Maine Department of Transportation Title VI Specialist at 207-524-3056 or 207-624-3030.**

Si la información contenida en este Plan de no discriminación del Título VI se necesita en otro idioma, comuníquese con el especialista del Título VI del Departamento de Transporte de Maine al 207-624-3066 o 207-624-3020.

Si vous avez besoin des informations contenues dans ce Plan de non-discrimination en conformité aux dispositions de la réglementation « Titre VI » dans une langue différente, veuillez contacter le spécialiste du Titre VI du département des transports du Maine au numéro 207-624-3066 ou 207-624-3020.

如果有人需要此“第六章不歧视计划”(Title VI Nondiscrimination Plan) 的另一种语言的版本，请拨打电话 207-624-3056 或 207-624-3020 联系缅因州交通部的第六章专员。

Haddii macluumaadka ku jira Qodobkan VI ee Qorshaha Kala-takoor La'aanta loogu baahan yahay luqad kale, fadlan kala xidhiidh Khabiirka Qodobka VI ee Waaxda Gaadiidka Maine telefoonka 207-624-3056 ama 207-624-3020.

لعدم التمييز مطلوبة بلغة أخرى، فُيُرجى الاتصال بأخصائي الباب VI إذا كانت المعلومات الواردة في خطة الباب السادس بوزارة النقل بولاية ماين على الهاتف رقم 207-624-3056 أو 207-624-3020 الباب السادس

## **TITLE VI PLAN OVERVIEW**

### **Assurances**

MaineDOT assures its compliance with Title VI and commits to nondiscrimination through both practice and policy. It has created a Title VI Policy and commits to all federally required assurances as they pertain to Title VI. Copies of the MaineDOT Policy and signed assurances can be found on our website and in **Appendix I** of this document.

### **Application**

The Provisions of this Title VI Plan apply to all recipients of FTA federal assistance through the Maine Department of Transportation (MaineDOT). A “recipient” includes any public or private entity or any individual receiving the benefits of any transit program. MaineDOT has a separate Title VI Program for other US DOT funded programs.

All plans and programs can be found at: <https://www.maine.gov/mdot/civilrights/title-vi/>.

Or by writing to:

Maine Department of Transportation  
Civil Rights Office  
SHS 16  
Augusta, Maine 04333-0016

Or by calling: (207) 624-3066

### **Executive Approval of Title VI Plan**

This Title VI plan has been reviewed and approved by the MaineDOT Commissioner. The Civil Rights Office provided the Commissioner with a draft plan and consults with the Commissioner on aspects and requirements of the Title VI Plan. Once the Plan is approved by the Commissioner, it is posted to the FTA (TrAMS) site for review and approval.

Any changes that are required by FTA in that review process will be made and the Commissioner will review and approve those changes.

## TITLE VI AUTHORITIES

**Title VI of the 1964 Civil Rights Act, 42 U.S.C. 2000d to 2000-4; 42 USC 4601 to 4655; 23 USC 109(h);** “No person in the United States shall, on the ground 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.” (Prohibits Discrimination, on the basis of race, color, or national origin, in impacts, services, and benefits of, access to, participation in, and treatment under a Federal-Aid recipient’s programs or activities)

**The Civil Rights Restoration Act of 1987**, P.L. 100-209, Clarification of the original intent of Congress in Title VI of the 1964 Civil Rights Act, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. (Restores the broad, institution-wide scope and coverage of the non-discrimination statutes to include all programs and activities of Federal-Aid recipients, subrecipients and contractors, whether such programs and activities are Federally assisted or not)

**The Age Discrimination Act of 1975**, as amended 42 U.S.C. 6101, provides: “No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” (Prohibits discrimination based on sex)

**The Americans with Disabilities Act**, P.L. 101-336, provides: “No qualified individual with a disability shall, by such reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a State or a local government.” (Provided enforceable standards to address discrimination against people with disabilities)

**Section 504 of the Rehabilitation Act of 1973**, 29 U.S.C. 790, provides that: “(N)o qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from Federal financial assistance.” (Prohibits discrimination based on physical or mental handicap)

**The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970**, 42 U.S.C. 4601, provides: “For the fair and equitable treatment of persons displaced as direct result of programs or projects undertaken by a Federal agency or with Federal financial assistance.” (Provides for fair treatment of persons displaced by Federal and Federal-aid programs and projects)

**The Uniform Relocation Act Amendments of 1987**, P.L. 101-246, provides: “For fair, uniform, and equitable treatment of all affected persons;...(and) minimizing the adverse impact of displacement...(to maintain)...the economic and social well-being of communities; and to establish a lead agency and allow for State certification and implementation.” (Updated the 1970 Act and clarified the intent of congress in programs and projects which cause displacement)

**The Civil Rights Act of 1991**, in part, amended Section 1981 of 42 U.S.C. by adding two new sections that provided:



(b) For the purposes of this section, the term `make and enforce contracts' includes the making performance, modification, and termination of contracts and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.

(c) The rights protected by this section are protected against impairment by non-governmental discrimination and impairment under color of State law.”

**The National Environmental Policy Act of 1969**, 42 U.S.C. 4321 Requires that consideration of alternatives, including the “no build” alternative, consideration of social, environmental and economic impacts, public involvement, and use of a systematic interdisciplinary approach at each decision-making stage of Federal Aid project development.

### **NONDISCRIMINATION EXECUTIVE ORDERS**

**E.O. 12250:** Department of Justice Leadership and Coordination of Nondiscrimination Laws.

**E.O. 12898:** Federal Actions to Address Environmental Justice in Minority populations and low-income populations

**E.O. 13160-** Nondiscrimination on the basis of race, sex, color, national origin, disability, religion, age, sexual orientation, and status as a parent in a Federally conducted education and training programs

**E.O. 13166-** August 11, 2000-requires Federal agencies and their recipients to improve access to federally sponsored programs for persons with Limited English Proficiency.

**E.O. 13175-** Consultation and Coordination with Indian Tribal Governments

### **NONDISCRIMINATION REGULATIONS & GUIDANCE**

The following are Federal Register Notices, Circulars, Regulations, Executive Orders, and Departmental Orders discussing Title VI:

- Title VI Regulation 49 CFR 21
- Title VI Circular 4702.1B, October 1, 2012, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients (MS Word)"
- Federal Register Notice on Circular 4702.1B (77 FR 52116) August 28, 2012
- Memo: Implementing Title VI Requirements in Metropolitan and Statewide Planning (MS Word)
- DOT Guidance of 2001: To Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries
- Executive Order 12898 of February 11, 1994: Environmental Justice Executive Order (MS Word)
- DOT Order of June 21, 1995: DOT Order to Address Environmental Justice
- Executive Order 13166 of August 11, 2000: Limited English Proficiency

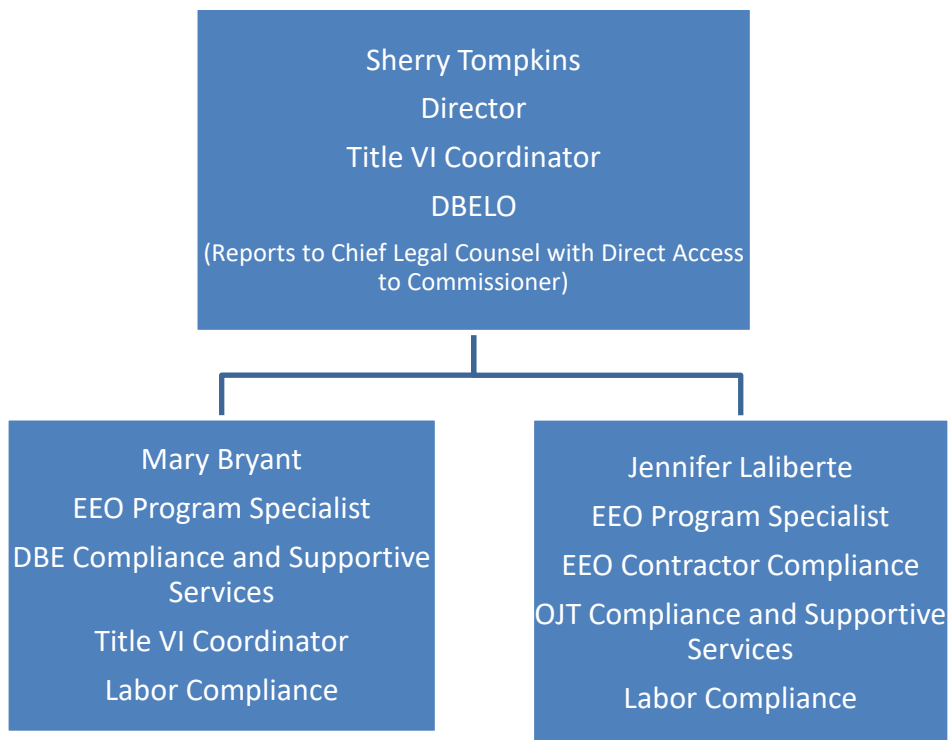
## **Organization and Staffing of the Office of Civil Rights (CRO)**

The Commissioner of MaineDOT is responsible for ensuring the implementation of MaineDOT's Title VI/Environmental Justice (EJ) programs. The Director of Civil Rights, on behalf of the Commissioner, is responsible for the overall management of the Title VI/EJ programs and is the designated Title VI Coordinator. The day-to-day administration of the program lies with the Director of Civil Rights who serves as the Title VI/EJ Specialist, under the supervision of the Chief Legal Counsel. The Title VI Coordinator at all times has direct access to the Commissioner, and has scheduled meetings with the Commissioner quarterly. The Director of Civil Rights shall have lead responsibility for coordinating the administration and implementation of the Title VI/EJ program and of related statutes, plans, and assurances.

The CRO works directly with the Bureau of Planning. The Transit Program Coordinator within the Bureau of Planning serves as the Title VI Liaison to the CRO.

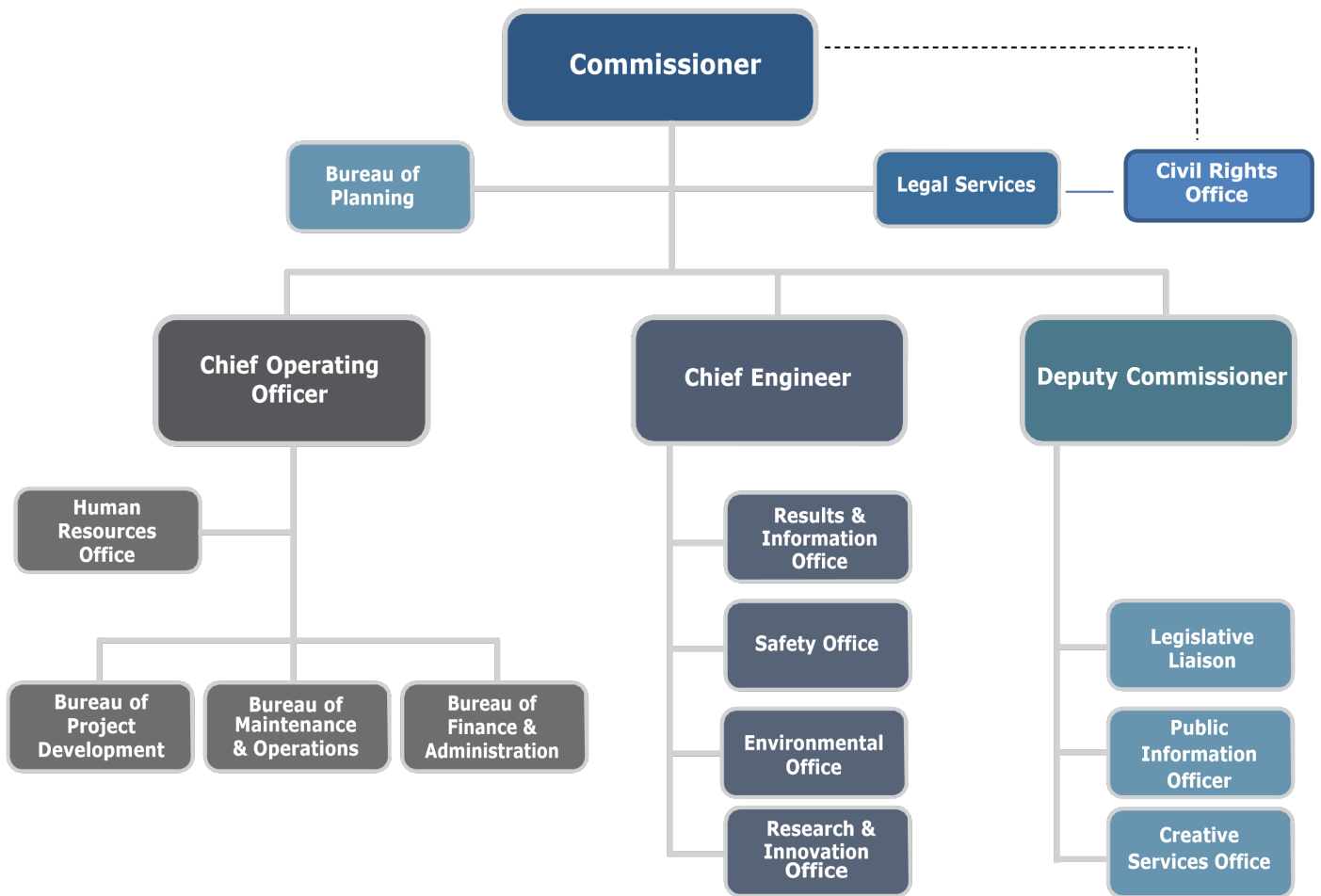
The Director of Civil Rights delegates some Title VI duties to the EEO Officers and to the Title VI Liaisons in program areas. The Liaisons work with the CRO to administer the Program in their respective areas.

### **CIVIL RIGHTS TITLE VI OFFICE STAFF**



Commissioner	Bruce A. Van Note	(207) 624-3003	<a href="mailto:bruce.dot@maine.gov">bruce.dot@maine.gov</a>
Acting Chief Legal Counsel	Anne Pare	(207) 624-3020	<a href="mailto:anne.pare@maine.gov">anne.pare@maine.gov</a>
Director, Civil Rights Office  Title VI Coordinator  DBELO	Sherry Tompkins	(207) 624-3066	<a href="mailto:sherry.tompkins@maine.gov">sherry.tompkins@maine.gov</a>
EEO Program Specialist  DBE Program Administrator  Title VI Coordinator  Labor Compliance	Mary Bryant	(207) 624-3056	<a href="mailto:mary.bryant@maine.gov">mary.bryant@maine.gov</a>
EEO Program Specialist  Contractor Compliance  OJT Program Administrator  Labor Compliance	Jennifer Laliberte	(207) 624-3036	<a href="mailto:jennifer.e.laliberte@maine.gov">jennifer.e.laliberte@maine.gov</a>

# MaineDOT Organizational Chart



September 2022



## **TITLE VI MONITORING AND REVIEW PROCESS**

### **Civil Rights Office Overview**

The Civil Rights Office coordinates external civil rights for FHWA, FTA and FAA subrecipients; ensures contractor compliance with US Department of Labor Prevailing Wage determinations and Office of Federal Contractor Compliance Program reporting; and oversees external compliance with Nondiscrimination, Affirmative Action, Equal Employment Opportunity, and Title VI programs.

### **Duties of the Civil Rights Office:**

- Coordinate Title VI program development and implementation with internal and external program areas.
- Conduct Title VI reviews of internal program areas and subrecipients to ensure compliance.
- Provide or secure Title VI training for DOT internal staff and subrecipients.
- Complete MaineDOT's Title VI Implementation Plan for submission to the FTA by October 1<sup>st</sup> of each year.
- Discrimination complaint investigation and resolution.
- Distribute and, where necessary, ensure translation, to include braille, of Title VI documents to the public.
- Review MaineDOT program manuals, contracts, and policy documents to determine whether Title VI is appropriately addressed and implemented agency wide.
- Work collaboratively with federal and state authorities in communicating Title VI program requirements.
- Review agency directives to determine if there are any Title VI implications.
- Provide or secure Title VI technical assistance, guidance, and training to MaineDOT staff, state officials, municipalities, Local Public agencies, contractors, consultants, and other recipients of federal-aid transit funding.
- Develop and conduct Title VI reviews of program area activities annually.
- Develop and publish Title VI information for dissemination to the general public and, where appropriate, ensure that the information is translated in languages other than English.
- Implement procedures for prompt processing and disposition of Title VI complaints.
- Assist in the collection of demographic data.
- Review contractual procedures for consultants and contractors to ensure equity and consistency.

### **Civil Rights Office Staff Responsibilities:**

- Ensure Title VI language is included in every Civil Rights Office subrecipient contract and subcontract.
- Perform reviews of selected MPOs, RPCs and LPAs and subrecipients to ensure Title VI adherence (see Subrecipient Review Process).
- Perform Title VI reviews with Liaisons in MaineDOT's program areas.
- Provide or secure training and technical assistance to the Title VI Liaisons and subrecipients.
- Compile and forward Title VI Implementation Plan to FTA every three years.
- Maintain the Title VI Plan and ensure Title VI, Equal Employment Opportunity (EEO), and Affirmative Action are implemented in MaineDOT's external programs.

- Collect and analyze demographic data for the purposes of monitoring those areas where Title VI (including Limited English Proficiency) and/or Environmental Justice populations may be adversely affected by MaineDOT's projects and activities.

### **Title VI Coordinator**

The Title VI Coordinator is charged with the responsibility for implementing, monitoring and ensuring MaineDOT's compliance with the Title VI regulations and related statutes. The Title VI Coordinator's responsibilities are as follows:

- Monitor Title VI activities.
- Provide training to MaineDOT staff as needed, and to outside agencies as requested.
- Work with Multimodal staff in the development of the Title VI Program.
- Develop Title VI information for dissemination (where necessary, in other language(s), format(s)).
- Establish procedures to promptly investigate Title VI complaints.
- Work with Multimodal staff to identify and eliminate discrimination, to review programs and grant applications, to resolve deficiencies within 90 days, and to collect and analyze statistical data.
- Work with Multimodal staff to develop processes to receive and review Title VI plans from subrecipients.
- Process the disposition of Title VI complaints received.
- Collect statistical data (race, color, national origin, LEP status) of participants in and beneficiaries of MaineDOT programs, (e.g., affected citizens, and impacted communities).
- Conduct training programs on Title VI and other related statutes for MaineDOT employees.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Establish procedures for promptly resolving deficiency status and writing the remedial action necessary
- Identify and eliminate discrimination.
- Ensure the aforementioned elements of the plan are appropriately implemented and maintained, and coordinate with those responsible for public outreach, involvement, service planning, and delivery.

### **Title VI Liaisons in Programs**

In addition to the Title VI Coordinator, each of MaineDOT's program areas will have a designated Title VI Liaison. The program areas are:

- Bureau of Planning: Public Outreach & Planning and Transportation Systems Analysis
- Bureau of Project Development
- Bureau of Maintenance and Operations
- Contract Procurement Office
- Environmental Office
- Safety Office
- ADA Program

The Liaisons are responsible for ensuring Title VI development in their respective areas, sharing Title VI information, resources and ensuring compliance of their subrecipients, Title VI program monitoring, and reporting to the Civil Rights Office the goals and results of their respective areas. Each program area is

responsible for performing a self-assessment to determine which personnel interact with members of the public.

## **Liaison Title VI Responsibilities**

### **Bureau of Planning**

Planning develops MaineDOT's Annual Work Plan, the Statewide Transportation Improvement Program (STIP) and the Public Involvement Plan to meet present and future transportation needs for safe, adequate, and efficient transportation and include all stakeholders and users in that process. The Regional Planning Commissions (RPCs) and the Metropolitan Planning Organizations (MPOs) provide information in developing these planning documents.

The Bureau's Title VI Liaison will:

- Serve as a resource person for the Bureau of Planning. Help to develop and document procedures that ensure participation of a cross-section of people representative of the population(s) affected by Department projects, including identifying and proactively reaching out to various and diverse social, economic, and ethnic interest groups, and ensure the groups are represented in the planning process.
- Provide information to Planning staff, MPOs, and RPCs regarding Title VI.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.
- Ensure equal opportunity for participation on RPCs.
- Ensure Title VI language is included in every Bureau of Planning subrecipient contract.
- Address any complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

### **Bureau of Project Development**

Project Development oversees complete multiple phases of construction projects including: advertising for and awarding bids (Contracts), conducting public hearings with the Bureau of Planning, acquisition of real property interests to accommodate highway, bridge and multi-modal facilities, relocating persons and businesses pursuant to the Uniform Relocation and Assistance Act of 1970, and supervising construction of Department projects to completion.

The Bureau's Title VI Liaison will:

- Monitor all Project Development activities to ensure nondiscrimination within program areas.
- Perform reviews of Title VI subrecipients to ensure Title VI adherence.
- Ensure Title VI language is included in every Bureau of Project Development program area subrecipient contract and subcontract.

- Serve as a resource person for the Bureau of Project Development. Help to develop and document procedures that ensure participation of a cross-section of people representative of the population(s) affected by Department projects, including identifying and proactively reaching out to various and diverse social, economic, and ethnic interest groups, and ensure the groups are represented in the planning process.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Title VI Coordinator with an annual report on Title VI accomplishments and/or issues and methods used for this year and any changes for the next year. Report is due to the Civil Rights Office by September 15<sup>th</sup> of each year.

### **Property Office**

MaineDOT's Property Office provides support for Programs in the area of the traditional Right of Way functions of appraisal review, negotiations, and relocation. Additionally, the Office provides technical support for mapping, utility coordination, title and condemnation functions. The Office is also responsible for delivering field surveys as needed to support transportation projects.

The Office's Title VI Liaison will:

- Monitor all activities to ensure nondiscrimination.
- Perform reviews of Title VI subrecipients to ensure Title VI adherence.
- Ensure Title VI language is included in subrecipient contracts and subcontracts.
- Serve as a resource person for the Property Office.
- Document procedures to ensure all population(s) affected are being treated fair and equitable
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Civil Rights Office.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

### **Multimodal Program**

MaineDOT's Multimodal program develops and manages the construction of non-highway and non-bridge projects, e.g., rail, bike/pedestrian trails). Multimodal is also tasked with the oversight of those projects selected to receive federal funding to develop and improve Maine's transportation network. These programs are administered by municipalities or other local public agencies (LPAs).

The Program's Title VI Liaison will:



- Ensure that LPAs provide the Department with signed Title VI Assurances (Form 1050.2a), including all Appendices, annually.
- Ensure that LPAs include in their subcontracts the appropriate Title VI documentation, i.e., Title VI Assurances, including all Appendices and Form 1273.
- Ensure that all MaineDOT public meetings and notices for LPA projects comply with Title VI.
- Address any complaints received with Title VI Coordinator.
- Assist the Civil Rights Office with Title VI compliance reviews of those subrecipients chosen by the Civil Rights Office and the Liaison annually.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

### **Bureau of Maintenance and Operations**

Maintenance and Operations (M&O) oversees the maintenance and repair and safe operation of all of Maine's state highways and bridges.

The Bureau's Title VI Liaison will:

- Monitor all M&O activities to ensure nondiscrimination with program areas.
- Provide information to program area staff regarding Title VI when necessary.
- Address any external complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Title VI Coordinator with an annual report on Title VI accomplishments and/or issues for this year and any changes for the upcoming year. The report is due to the Civil Rights Office by September 15<sup>th</sup> of each year.

### **Traffic Engineering**

Traffic Engineering is responsible for tracking crash records, collecting traffic data and maintaining MaineDOT's electrical devices and pavement marking program. The section also includes right of way control and our sign shop.

The Bureau's Title VI Liaison will:

- Monitor all traffic activities to ensure nondiscrimination with program areas.
- Provide information to program area staff regarding Title VI when necessary.
- Address any external complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.

- Provide the Title VI Coordinator with an annual report on Title VI accomplishments and/or issues for this year and any changes for the upcoming year. The report is due to the Civil Rights Office by September 15<sup>th</sup> of each year.

## **Contracts**

MaineDOT's Contract Procurement Office (CPO) is responsible for development, implementation and oversight of MaineDOT's contractual policies, procedures, and standards. The office provides the Department with prudent contracting practices in the areas of Consultant Contracts, State Administered Municipal Projects, and Professional Services Contracts. The construction contract office oversees advertising for and awarding bids and contracts for construction.

The Offices' Title VI Liaisons will:

- Ensure Title VI language is included in every contract for the Department and subrecipient contracts and subcontracts.
- Serve as a resource person for their respective offices.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Title VI Coordinator with an annual report on Title VI accomplishments and/or issues and methods used for this year and any changes for the next year. Report is due to the Civil Rights Office by September 15<sup>th</sup> of each year.

## **Environmental Office**

The Environmental Office plays a lead role in proactively integrating transportation, environmental and innovation objectives with the department's plans, operations, and maintenance activities.

The Office's Title VI Liaison will:

- Serve as a resource person for the Environmental Office.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.
- Monitor all activities to ensure nondiscrimination on any projects.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Civil Rights Office.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

## **Safety Office**

MaineDOT's Office of Safety and Mobility performs data-driven safety analysis to identify safety issues on Maine's highway network, develops solutions to these issues and creates a portfolio of projects for the Department's Highway Safety Improvement Program. The Mobility section analyzes traffic patterns, volumes, and forecasts changes in these through travel demand modelling. It also performs traffic studies to identify areas of high congestion and proposes alternatives to mitigate these issues.

The Office's Title VI Liaison will:

- Serve as a resource person for the Safety Office.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.
- Monitor all activities to ensure nondiscrimination on any projects.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Civil Rights Office.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

## **ADA Office**

The ADA office is on the review team for the Safe Routes to School applications from Municipalities and all applications are scored and towns in HUD designated low to moderate income counties are weighted for scoring purposes. They also require information on how the project will positively impact low-income communities, school age populations and senior populations. The ADA office also reviews RFQ applications for ADA.

ADA reviews potential projects from the MaineDOT's Heads-Up project in the Bureau of Planning. These projects are selected from a municipal process which prioritizes locations in communities with high rates of pedestrian crashes.

MaineDOT updates the ADA curb ramp inventory annually and that can be reviewed at:

<https://www.maine.gov/mdot/civilrights/ada/>

The Office's Title VI Liaison will:

- Serve as a resource person for the ADA Office.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.
- Monitor all activities to ensure nondiscrimination.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Civil Rights Office.

- Provide the Civil Rights Office with a quarterly report regarding all activities indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an annual report of Title VI accomplishments and/or any issues for this year and any changes for the next year. Report is due by September 15<sup>th</sup> of each year.

### **Title VI Data Collection**

To ensure that Title VI reporting requirements are met, MaineDOT maintains:

- A database or log of Title VI complaints received that tracks the investigation of and response to each complaint.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

MaineDOT has not received a Title VI complaint, but has processes in place to keep original Title VI complaints for one year, and a summary of Title VI complaints received for five years.

### **Annual Report and Updates**

MaineDOT will keep its own log and will ensure subrecipients of FTA funds submit a log to MaineDOT annually that documents any Title VI complaints received for each year. MaineDOT will also keep its own log and will ensure subrecipients also maintain and provide to MaineDOT, on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income individuals have meaningful access to these activities.

Furthermore, MaineDOT requires subrecipients to submit to MaineDOT updates to any of the following items subsequent to its previous submission, or a statement to the effect that these items have not been changed since the previous submission:

- A copy of any compliance review report for reviews conducted in the last three (3) years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations;
- Limited English Proficiency (“LEP”) plan;
- Procedures for tracking and investigating Title VI complaints;
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission; and
- A copy of the agency’s notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint.

## **Triennial Review of MaineDOT's Title VI Program and Subrecipients' Title VI Programs**

Every three years, MaineDOT will review subrecipients' Title VI programs to ensure implementation of their Title VI plans. In addition, MaineDOT will provide subrecipients with operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

## **Dissemination of Information Related to the Title VI Program**

Information on MaineDOT's Title VI program will be disseminated to employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document and according to federal and state laws/regulations. The Title VI program will be available in other languages when needed according to the Language Assistance Plan (LAP).

MaineDOT requires its subrecipients to do the same.

## **Resolution of Complaints**

Any individual may exercise his or her right to file a complaint if that person believes that he, she, or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. MaineDOT requires subrecipients to report the complaint to MaineDOT's Civil Rights Office within a reasonable timeframe, and to make a concerted effort to resolve complaints locally using the agency's Title VI Complaint Procedures.

## **Written Policies and Procedures**

MaineDOT's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated every three years to incorporate changes and additional responsibilities that arise.

## **Internal Education**

MaineDOT's employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, MaineDOT's obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of the Title VI Coordinator.

MaineDOT will ensure that subrecipients are providing similar Title VI training to employees.

## **Title VI Clauses in Contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), MaineDOT's contract/PO will include appropriate non-discrimination clauses. The Title VI Coordinator will work with Chad Lewis, who is responsible for procurement contracts and PO's, to ensure appropriate non-discrimination clauses are included.

## **Subrecipient Review Procedures**

MaineDOT will update its list of subrecipients every three years. MaineDOT has developed a review process for these subrecipients. MaineDOT's checklist for conducting Title VI reviews and a sample of questions MaineDOT asks during subrecipient reviews are attached in **Appendix III**, entitled FTA Compliance Subrecipient Self-Certification Checklist.

**Subrecipient Reviews List:**

<b>5311 Sub-Grantees Site Visit Summary: 2023</b>	<b>Last Full Site Visit Date</b>	<b>Mode</b>	<b>Received Self Certification</b>	<b>Approved</b>	<b>Closed</b>	<b>Next Full Site Visit Due</b>
<b>Region One</b>						
Aroostook Regional Transportation System (ARTS)	4/12/2022	Virtual	5/1/2023	5/1/2023	5/1/2023	2027
<b>Region Two</b>						
Downeast Community Partners (DCP)	2/25/2021	Virtual	4/13/2023	4/13/2023	4/13/2023	2026
Downeast Transportation (DTI)	5/19/2021	Virtual				2026
West's Transportation	5/27/2021	Virtual	9/14/2023	9/14/2023	9/14/2023	2026
<b>Region Three</b>						
Penquis (The Lynx)	11/4/2021	Virtual	3/23/2023	3/27/2023	3/27/2023	2026
<b>Region Four</b>						
Kennebec Valley Community Action Program (KVCAP)	1/28/2021	Virtual	4/12/2023	4/13/2023	4/13/2023	2026
<b>Region Five</b>						
Waldo County Community Partners	10/27/2022	Virtual				2027
Bath City Bus	5/17/2019	In-person site visit	4/12/2023	4/13/2023	4/13/2023	2024*
<b>Region Six</b>						
Regional Transportation Program (RTP)	1/14/2020	In-person site visit	3/31/2023	3/31/2023	3/31/2023	2025
<b>Region Seven</b>						
Western Maine Transportation Services	8/6/2019	In-person site visit	4/14/2023	4/25/2023	4/25/2023	2024
<b>Region Eight</b>						
York County Community Action Corporation	9/10/2020	Virtual	4/10/2023	4/10/2023	4/10/2023	2025

*\*Service ended June 2023, no additional site visits needed.*

## **Notification**

The Civil Rights Office will notify subrecipients of upcoming Title VI reviews by correspondence. An itemized listing will accompany the notification letter and will inform the subrecipient of the information and documents needed by the Civil Rights Office.

## **Itemized Listing and Response to the Civil Rights Office**

Subrecipients have 30 days from receipt of the initial notification to return documents and information to the Civil Rights Office in response to the itemized listing.

## **Desk Audit**

The Civil Rights Office will review the documents and information submitted by the subrecipient during a desk audit. The Civil Rights Office will prepare a Report of Findings, which may include recommendations to strengthen the subrecipient's Title VI program.

## **On-site Review**

The findings made during the desk audit generally determine whether an on-site review is necessary. If an on-site review is necessary, the subrecipient will be notified, and the on-site review will be conducted by teleconference. When necessary, physical on-site reviews will be conducted in accordance with federal, state, and local guidelines governing social distancing amid COVID resurgences.

## **Deficiencies**

Deficiencies will be documented in the report and must be corrected by the subrecipient. If there are no deficiencies, the report may still provide recommendations for strengthening the subrecipient's Title VI program.

## **Follow-up Monitoring**

The Civil Rights Office will determine if additional monitoring is needed to obtain a compliant status and ensure ongoing compliance with Title VI/Nondiscrimination requirements.

MaineDOT has a standard check list that it follows to ensure that all documents are provided, and explanations and documentation of processes are given proper consideration. MaineDOT will first conduct a desk audit of all information requested. If serious deficiencies are found that cannot be remedied through documentation, a site visit will be undertaken.

Aside from the information required above, MaineDOT will review public participation and what processes the agency has for providing information to impacted communities. It will also examine if and how any diverse populations were identified and how these populations were notified. This will require a review of the agency's data collection processes and knowledge of Title VI populations that may be impacted.



## **Review of MaineDOT Directives**

The Director of the Civil Rights Office receives and reviews all draft Administrative Policy Memoranda for compliance with federal civil rights laws and regulations. If a memorandum is believed to have Title VI implications, it will be discussed with the Commissioner and modified as necessary.

## **Compliance and Enforcement Procedure**

In the event MaineDOT determines, after the completion of a pre-award or post-award desk audit review, compliance review or complaint investigation (collectively, the "Review"), that a subrecipient is not in compliance with Title VI requirements, MaineDOT will notify the subrecipient in writing, meet and coordinate with the subrecipient to develop remedial action to promptly resolve the deficiency(ies), and prepare a written plan of such remedial action, all within 90 days of MaineDOT's original determination.

## **Remedial Action**

Subrecipients found not to be in compliance are expected to correct all deficiencies according to the remedial action plan prepared by MaineDOT. The Title VI Coordinator will provide technical assistance and work with the subrecipient to ensure implementation of the remedial action plan. When the Title VI Coordinator has determined that a subrecipient's deficiencies are sufficiently corrected, the subrecipient will be notified that the review process is complete. MaineDOT will send an official Closeout Letter to the Subrecipient.

## **Effecting Compliance**

When a subrecipient fails to take appropriate action to make corrective action(s) to resolve the deficiency(ies) cited in the review:

- The subrecipient moves from a "deficiency status" to non-compliance;
- MaineDOT will submit a copy of the case file to FTA with a recommendation that the subrecipient be found in noncompliance; and/or
- MaineDOT may, with the concurrence of FTA (or other USDOT oversight agency), initiate proceedings to impose sanctions for non-compliance.

## CHAPTER III REQUIREMENTS

### 1. Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients and subrecipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, MaineDOT shall disseminate this information to the public by:

- Posting a Title VI notice on the agency's website
- Posting a Title VI notice in public areas of the agency's office(s), including the reception desk, and/or other public-facing areas
- Posting a Title VI notice in federally-funded vehicles (required of subrecipients)

As part of Title VI requirements, sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed.

MaineDOT will include the following on all public notices and meeting notices:

# *MaineDOT*

*Integrity • Competence • Service*

In accordance with the Civil Rights Act of 1964, MaineDOT operates its programs and services without regard to race, color, or national origin. Any person who believes she or he has been aggrieved by any unlawful discriminatory practices under Title VI may file a complaint with the Maine Department of Transportation.

For more information on MaineDOT's civil rights program and the procedures to file a complaint, visit our website at:

<http://www.maine.gov/mdot/civilrights/title6.htm>

or call 207-624-3066 (TTY 888-516-93640); email [sherry.tompkins@maine.gov](mailto:sherry.tompkins@maine.gov)

Language translation services available upon request.  
Services de traduction langue disponibles sur demande  
Servicios de traducción disponibles bajo petición.  
要求提供的语言翻译服务。

Lugha ya tafsiri huduma inapatikana juu ya ombi.  
Ladenan panarjamahan Basa aya kana paménta.

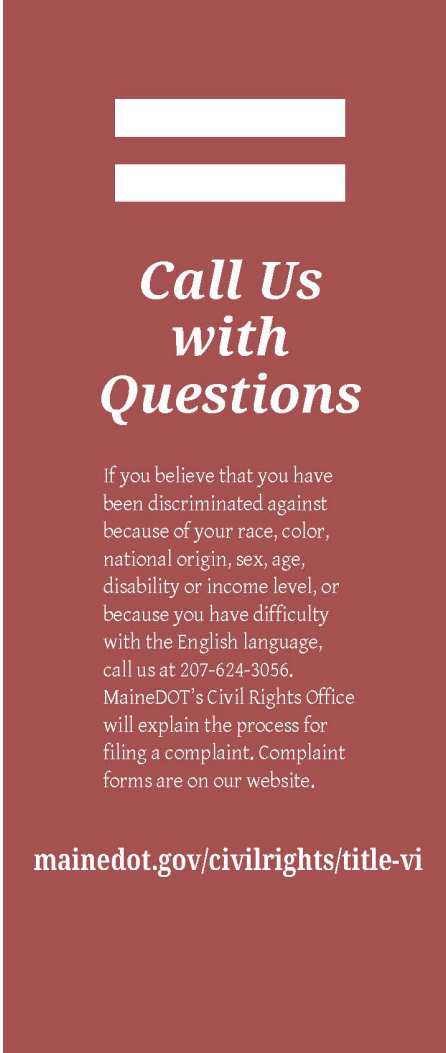
خدمات الترجمة اللغة متاحة عند الطلب

*MaineDOT's Title VI notice to the public is a vital document that informs people of their civil rights and as such will be fully translated into the languages identified as meeting the Safe Harbor threshold in MaineDOT's Language Assistance Plan Four Factor Analysis. For the languages clustered as "Other," vital documents will be translated upon request.*

## MaineDOT Title VI Brochure

The Title VI Notice to the Public is posted on the MaineDOT website and on our Title VI Brochure Complaint Procedure, and at each FTA subrecipient's public notice areas, including transit vehicles.

### Front of the brochure:



**Call Us  
with  
Questions**

If you believe that you have been discriminated against because of your race, color, national origin, sex, age, disability or income level, or because you have difficulty with the English language, call us at 207-624-3056. MaineDOT's Civil Rights Office will explain the process for filing a complaint. Complaint forms are on our website.

[mainedot.gov/civilrights/title-vi](http://mainedot.gov/civilrights/title-vi)

**Language translation services  
available upon request.**

Services de traduction de langue disponibles sur demande.

Servicios de traducción disponibles bajo petición.

要求提供的 语言翻译服务。

Lugha ya tafsiri huduma inapatikana juu ya ombi.  
Ladenan panarjamahan Basa aya kana paménta.

بطل طلب دن ع حاجاتم ة غللا ةم جرتلا تامدخ

Có các dịch vụ phiên dịch khi quý vị yêu cầu.

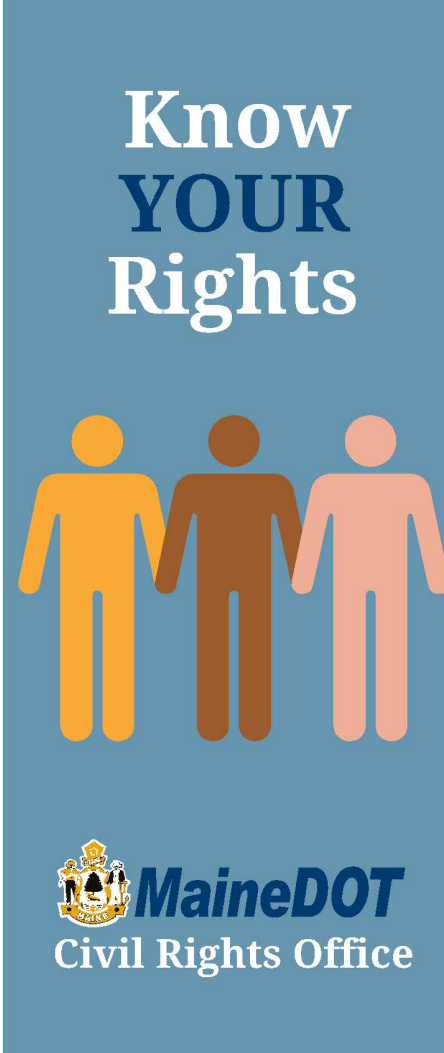


**MaineDOT**

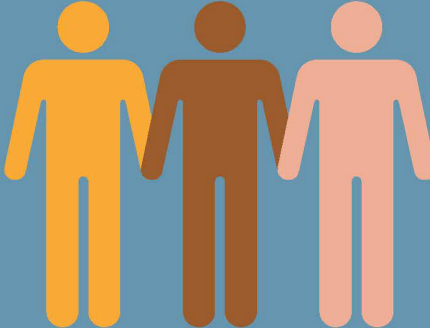
Maine Department of Transportation  
Civil Rights Office


16 State House Station  
Augusta, Maine 04333-0016

Phone: 207-624-3056  
TTY Users Dial Maine Relay 711



**Know  
YOUR  
Rights**



 **MaineDOT**  
Civil Rights Office

**Back of the brochure:**

# TITLE VI PROGRAM of the Civil Rights Act

MaineDOT's mission is to provide the people of Maine with a safe, efficient and effective transportation system. Our work is intended to serve the transportation needs of all people in Maine, regardless of race, color, national origin, sex, age, disability, income level or limited English proficiency.

MaineDOT is committed to assuring that none of its activities or programs encourage discrimination. We manage our programs without regard to race, color, national origin, sex, age, disability, income level, or the ability to speak or understand English.



MaineDOT will not allow discrimination by a MaineDOT employee or by recipients of federal-aid funds such as cities, counties, contractors, or planning agencies. MaineDOT prohibits all discriminatory practices which may result in:

- Unfair denial of any service, financial aid or benefit provided by the federally funded program;
- Different standards or requirements for participation in programs;
- Segregation or separate treatment within our programs;
- Differences in the quality, quantity or way in which a benefit is provided;
- Discrimination in any activities in a facility built with federal funds.

To ensure compliance with Title VI, and other related laws, MaineDOT:

- Avoids or reduces harmful health and environmental impacts which programs or activities might have on minority and low-income populations;
- Ensures the full and fair participation by all communities in its decision-making process;
- Prevents the denial, reduction or delay of benefits for minority and low-income populations;
- Provides language interpreters to people who have difficulty understanding English.

## How to File a Complaint

If you believe you have been discriminated against, you will need to file a written complaint. The complaint must be submitted within 180 days of the alleged discrimination. The complaint form is on our website for you to download.

**Be prepared to fill in:**

- Your name, address and phone number;
- The name and address of the organization you believe discriminated against you;
- Details of the alleged discrimination and any other relevant information; and
- The names of anyone we could contact regarding the alleged discrimination.

**Once you have filled in the form, mail it to us:**

**MaineDOT Civil Rights Office**

16 State House Station  
Augusta, Maine 04333-0016

207-624-3056



*MaineDOT's Title VI program brochure is a vital document that informs people of their civil rights and as such will be fully translated into the languages identified as meeting the Safe Harbor threshold in MaineDOT's Language Assistance Plan Four Factor Analysis. For the languages clustered as "Other," vital documents will be translated upon request.*

## MaineDOT Title VI Complaint Procedure

Any person who believes they have been discriminated against on the basis of race, color or national origin by the Maine Department of Transportation (hereinafter referred to as "MaineDOT") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Department investigates complaints received no more than 180 days after the alleged incident. The Department will process complaints that are complete.

Once the complaint is received, MaineDOT will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

MaineDOT has 90 days to investigate the complaint. If more information is needed to resolve the case, MaineDOT may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, MaineDOT can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his/her case.

Within ninety (90) days of the receipt of complaint, the MaineDOT investigator will review the complaint and will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

This notification will advise the complainant of the following possible avenues of appeal if dissatisfied with the decision: U.S. Department of Transportation or Division of Local Assistance, Office of Civil Rights.

### **MaineDOT's Appeal Procedure:**

If the complainant wishes to appeal the decision, they have 30 days after the date of the letter or the LOF to do so.

1. The complainant has the right to appeal all written reports.
2. This appeal must be made in writing to the Title VI Coordinator within thirty (30) days of receipt of the Department's final report.
3. The appeal must specifically cite the portion(s) of the finding with which the complainant disagrees and his/her reason(s) for the disagreement.
4. MaineDOT will forward the appealed decision to the Commissioner's Office who will serve as an independent adjudicator and who will review the investigation and issue a second determination and report.
5. If a person seeks a further appeal, he or she can go to FTA.



**Maine Department of Transportation  
External Discrimination Complaint Form**

**(Title VI/Nondiscrimination and ADA/Section 504 Complaints)**

SECTION I			
Name:	Email Address:	Phone:	
Address:	City:	State:	Zip:
SECTION II			
1. Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes (go to Section III) <input type="checkbox"/> No (go to #2)			
2. If you answered “no” to question 1, please describe your relationship to the person (“complainant”) for whom you are filing and why you are filing for a third party.			
3. Have you obtained permission of the aggrieved party (complainant) to file this complaint on his or her behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No			
SECTION III			
1. Date of Incident:			
2. If applicable, name of person(s) who allegedly discriminated against you:			
3. I believe I was discriminated against based on: <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability			
4. Please provide a brief explanation of the incident and how you feel you were discriminated against, including how you feel others may have been treated differently than you. If you require additional space or have additional written material pertaining to your complaint, please attach to this form.			
5. Why do you believe discrimination occurred?			
6. What remedy are you requesting? Be specific.			



7. Please list any person(s) we may contact for additional information to support or clarify your complaint.			
Name:		Phone:	
Address:	City:	State:	Zip:
<b>SECTION IV</b>			
1. Have you previously filed a Title VI Complaint with the Maine Department of Transportation? <input type="checkbox"/> Yes <input type="checkbox"/> No			
2. Have you filed this complaint with any other federal, state, or local agencies or with any state or federal court? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, please check all that apply: <input type="checkbox"/> Federal Agency <input type="checkbox"/> Federal Court <input type="checkbox"/> Local Agency <input type="checkbox"/> State Agency <input type="checkbox"/> State Court			
3. If filed at an agency and/or court, please provide information for your point of contact at the agency/court where the complaint was filed:			
Agency/Court:			
Contact Name:	Address:	Phone Number:	
<b>SECTION V</b>			
<b>PLEASE NOTE: The Maine Department of Transportation cannot accept your complaint without a signature.</b>			
I affirm that I have read the above charge and it is true to the best of my knowledge.			
Complainant's Signature: _____		Date: _____	
Printed or Typed Name of Complainant: _____			

**Please Mail Complaint to:**  
Maine Department of Transportation  
Civil Rights Office  
State House Station 16  
Augusta, Maine 04333-0016  
Attention: Sherry Y. Tompkins  
Email: [sherry.tompkins@maine.gov](mailto:sherry.tompkins@maine.gov), Fax: 207-624-3021  
Phone: (207) 624-3066 ~ TTY Users dial Maine Relay 711

A person may also file a complaint directly with the Federal Transit Administration:

**Federal Transit Administration**

Region 1 Office  
Kendall Square  
55 Broadway, Suite 920  
Cambridge, MA 02142-1093  
Phone: 617-494-2729

Or

**Federal Transit Administration**

Office of Civil Rights,  
Attention: Title VI Coordinator  
East Building, 5th Floor-TCR  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

Language translation services available upon request.

Services de traduction langue disponibles sur demande

Servicios de traducción disponibles bajo petición.

要求提供的语言翻译服务。

Lugha ya tafsiri huduma inapatikana juu ya ombi.

Ladenan panarjamahan Basa aya kana paménta.

خدمات الترجمة اللغة متاحة عند الطلب

*For more information about these protections or to file a complaint, please contact the  
MaineDOT Civil Rights Office at (207) 624-3066*

**2. List of Title VI Investigations, Complaints or Lawsuits**

In order to comply with 49 CFR Section 21.9 (b), MaineDOT and its subrecipients prepare and maintain a list of any active investigations conducted by FTA and entities other than FTA, including lawsuits and/or complaints naming MaineDOT or a subrecipient that allege discrimination on the basis of race, color, or national origin.

This list includes:

- The date that the transit-related Title VI investigation; lawsuit or complaint was filed;
- A summary of the allegation(s);
- The status of the investigation, lawsuit or complaint; and
- Actions taken by MaineDOT in response, or final findings related to the investigation, lawsuit, or complaint.

Subrecipients may create their own format for recording Title VI investigations, complaints and lawsuits or they can adopt the format shown in this document below. Subrecipients must submit their record keeping procedures to MaineDOT every three (3) years.

As of the writing of this program, there are zero (0) complaints pending which allege discrimination on the grounds of race, color, national origin or any other form of discrimination. No complaints specific to Title VI were filed in the reporting period.

There are currently no active Title VI complaints against MaineDOT. See log below.

**2020**

<b>TYPE</b>	<b>DATE</b>	<b>SUMMARY</b> <i>(Include basis, i.e. race, color, national origin, disability, etc.)</i>	<b>STATUS</b>	<b>ACTION(S) TAKEN</b>
<b>INVESTIGATIONS</b>				
1. 0	2020	N/A	N/A	N/A
2. 0	2020	N/A	N/A	N/A
3. 0	2020	N/A	N/A	N/A
<b>LAWSUITS</b>				
1. 0	2020	N/A	N/A	N/A
2. 0	2020	N/A	N/A	N/A
3. 0	2020	N/A	N/A	N/A
<b>COMPLAINTS</b>				
1. 0	2020	N/A	N/A	N/A
2. 0	2020	N/A	N/A	N/A
3. 0	2020	N/A	N/A	N/A

**2021**

<b>TYPE</b>	<b>DATE</b>	<b>SUMMARY</b> <i>(Include basis, i.e. race, color, national origin, disability, etc.)</i>	<b>STATUS</b>	<b>ACTION(S) TAKEN</b>
<b>INVESTIGATIONS</b>				
1. 0	2021	N/A	N/A	N/A
2. 0	2021	N/A	N/A	N/A
3. 0	2021	N/A	N/A	N/A
<b>LAWSUITS</b>				
1. 0	2021	N/A	N/A	N/A
2. 0	2021	N/A	N/A	N/A
3. 0	2021	N/A	N/A	N/A
<b>COMPLAINTS</b>				
1. 0	2021	N/A	N/A	N/A
2. 0	2021	N/A	N/A	N/A
3. 0	2021	N/A	N/A	N/A

**2022**

<b>TYPE</b>	<b>DATE</b>	<b>SUMMARY</b> <i>(Include basis, i.e. race, color, national origin, disability, etc.)</i>	<b>STATUS</b>	<b>ACTION(S) TAKEN</b>
<b>INVESTIGATIONS</b>				
1. 0	2022	N/A	N/A	N/A
2. 0	2022	N/A	N/A	N/A
3. 0	2022	N/A	N/A	N/A
<b>LAWSUITS</b>				
1. 0	2022	N/A	N/A	N/A
2. 0	2022	N/A	N/A	N/A
3. 0	2022	N/A	N/A	N/A
<b>COMPLAINTS</b>				
1. 0	2022	N/A	N/A	N/A
2. 0	2022	N/A	N/A	N/A
3. 0	2022	N/A	N/A	N/A

## **2023**

<b>TYPE</b>	<b>DATE</b>	<b>SUMMARY</b> <i>(Include basis, i.e. race, color, national origin, disability, etc.)</i>	<b>STATUS</b>	<b>ACTION(S) TAKEN</b>
<b>INVESTIGATIONS</b>				
1. 0	2023	N/A	N/A	N/A
2. 0	2023	N/A	N/A	N/A
3. 0	2023	N/A	N/A	N/A
<b>LAWSUITS</b>				
1. 0	2023	N/A	N/A	N/A
2. 0	2023	N/A	N/A	N/A
3. 0	2023	N/A	N/A	N/A
<b>COMPLAINTS</b>				
1. 0	2023	N/A	N/A	N/A
2. 0	2023	N/A	N/A	N/A
3. 0	2023	N/A	N/A	N/A

### **Public Participation**

Planning (23 CFR 450.210(a) & 23 CFR 450.316(1)), Environment (National Environmental Policy Act of 1969), Property (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended) and Design (23 USC 109(h)) require effective public involvement/public participation processes, which are combined into MaineDOT's *Public Involvement in Transportation Decision Making*, found at:

<https://www.maine.gov/mdot/planning/docs/2021/pip0321.pdf>.

### **Key Principles of MaineDOT's Public Participation Process**

MaineDOT has developed a robust public participation process designed to offer participants continuous opportunity for input in an effort to ensure that no one is precluded from participating in transportation planning. MaineDOT's public participation process includes a variety of tools designed to ensure that it:

- Identifies and engages affected and potentially affected communities, with particular emphasis on racial and ethnic minority communities, including limited English proficient populations (LEP), as well as other constituencies historically underserved by transportation programs, such as low-income populations, and zero automobile households.

- Engages in focused and direct outreach with numerous key stakeholders, advocacy groups, community-based organizations, or other representatives of the affected or potentially affected communities.
- Implements measures to disseminate information and provide education—in clear, plain, and accessible language, including in languages other than English as requested — to affected communities.
- Utilizes diverse communication platforms to reach the broadest audience, and delivers targeted outreach to minority, LEP, low-income and other underrepresented communities to ensure these historically underrepresented groups have a seat at the table during transit-based decision-making processes.
- Ensures community responses are addressed and incorporated into transportation planning and decision-making.
- Utilizes inclusive approaches to solicit and maximize participation by representatives or members of affected or potentially affected communities in meaningful and robust engagement.
- Provides accessibility by implementing public engagement measures that are, to the maximum extent practicable, free of linguistic, cultural, economic, and historical barriers that impede or prevent effective public participation in the decision-making process.

Through an open public process, MaineDOT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to MaineDOT's transportation decision-making process by minority and LEP populations. The public participation plan describes the overall goals, guiding principles and outreach methods that MaineDOT uses to reach the public.

LEP refers to persons for whom English is not their primary language and who have limited ability to read, write, speak, or understand English. It includes people who reported to the US Census American Community Survey that they speak English less than very well.

### **Goals of the Public Participation Plan**

The overarching goals of MaineDOT's PPP include:

- **Clarity in Potential for Influence** - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment** - MaineDOT communicates regularly, develops trust with the community and builds community capacity to provide public input.
- **Diversity** - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities and residents with Limited English Proficiency.

- **Accessibility** - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically and culturally accessible.
- **Relevance** - Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Participant Satisfaction** - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships** - MaineDOT develops and maintains partnerships with communities through the methods described in its public participation plan.
- **Quality Input and Participation** - Comments received by MaineDOT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.
- **Project Selection** - All projects selected by MaineDOT are evaluated to ensure improvement of quality and available public and specialized transportation services to disparate populations.

### **Objectives of the Public Participation Plan**

MaineDOT's Public Participation Plan (PPP) is based on the following principles:

- **Flexibility** - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness** - MaineDOT will proactively reach out to and engage low income, minority and LEP populations from the service area.
- **Respect** - All feedback will be given careful and respectful consideration.
- **Proactive and Timely** - Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** - Participation methods will have a clear purpose, be used for input and will be described in a language that is easy to understand.
- **Honest and Transparent** - Information provided will be accurate, trustworthy and complete.
- **Responsiveness** – MaineDOT will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

### **Public Involvement and Traditionally Underserved Populations**

Many people in minority and low-income communities, as well as those with low literacy and/or limited English proficiency, have traditionally been underserved by conventional outreach methods. Reaching out to traditionally underserved groups help ensure that all customers and stakeholders have opportunities to influence the decision-making process. It sets the tone for subsequent project activities and promotes a spirit of inclusion. MaineDOT meeting planners strive to encourage attendance among groups protected by anti-discrimination laws with which

MaineDOT is required to comply. This tailoring of outreach efforts is particularly useful because the efforts:

- Provide fresh perspectives to project planners and developers.
- Give MaineDOT information about community-specific issues and concerns.
- Allow MaineDOT to identify potential conflicts.
- Allow feedback on how to get underserved communities involved.
- Increase the likelihood that solutions ultimately selected are those which best meet the needs of these communities.

To maximize the effectiveness of the Department's public participation efforts in engaging underserved populations, MaineDOT staff employ the following strategies and best practices:

- Plan public meetings and hearings well in advance and publicize them in diverse media, flyers, and on the MaineDOT website.
- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Ensure that meeting notices state that the meeting uses accessible-format materials.
- Determine the existence of non-English languages and other cultural characteristics that could inhibit public participation and offer appropriate accommodations to reduce any barriers.
- Accept both verbal and written comments in languages other than English.
- Hold meetings and conduct outreach in the affected neighborhoods, using community centers as meeting locations and venues for informal outreach.
- Use varied meeting times and locations to accommodate the schedule, transportation, and child-care limitations of diverse community members.
- Use an OnDemand format so that affected communities can click and learn about projects as needed, and learn about projects coming to their areas. They can also access the information in their desired language using the You Tube video platform.
- Hold meetings at convenient locations that are accessible and welcoming to all, including those with disabilities. This includes providing appropriate room set-up and, when requested, alternate formats of handouts (e.g., large-print materials) and audio equipment as requested.
- Make available alternative methods, like the virtual platform, for two-way flow of information and input between MaineDOT and people who are not likely to attend meetings.
- Use various illustration and visualization techniques to convey the project information including, but not limited to, charts, graphs, photos, maps, and the Internet.
- Reach out to others, both internally and externally, with expertise in contacting and connecting with underserved populations to obtain advice and information about best practices and effective techniques.
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;



- Regularly utilize radio, community television, or newspaper ads that serve LEP populations;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

### **Title VI Public Notice**

MaineDOT posts a “Notice to the Public” on bulletin boards and in public places at its main office and regional facilities. The Title VI Public Notice is also posted on the MaineDOT website at <http://www.maine.gov/mdot/civilrights/title-vi> and is titled “Non-Discrimination/Title VI Poster”. **The Public Notice is provided herein on page 26.**

In addition, a copy of MaineDOT’s Civil Rights brochure, “Know Your Rights” is made available at all public meetings conducted by MaineDOT and is in the process of being translated into the languages identified by Factor 1 of the Four Factor Analysis in the LAP. The brochure can be made available in the languages categorized or clustered by the U.S. Census as “Other” upon request for the benefit of LEP populations. **The brochure is provided herein on page 28.**

### **Notification to Beneficiaries – Website**

MaineDOT’s website is designed to ensure Title VI information is readily accessible to the public. The website informs the public of their rights under Title VI and provides information on how to file a complaint. Title VI information available on MaineDOT’s website includes:

- MaineDOT’s Title VI Implementation Plan
- Demographic Profile of Maine (to be updated as demographic information becomes available)
- How to File a Discrimination Complaint
- Title VI Complaint Form
- Foreign Language Interpretation Information
- Language Identification Card
- Minority and Outreach Contact Information
- Title VI Public Participation Template for Subrecipients
- Title VI Brochure – Know Your Rights
- Nondiscrimination/Title VI Poster
- Minority Populations by County – charts and maps

### **3. Public Participation Plan**

MaineDOT strives to involve the public at all stages in the transportation decision-making process. Through an open public process, MaineDOT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to MaineDOT’s transportation decision-making process by minority and LEP populations. The public participation

plan describes the overall goals, guiding principles and outreach methods that MaineDOT uses to reach the public.

LEP refers to persons for whom English is not their primary language and who have limited ability to read, write, speak, or understand English. It includes people who reported to the US Census American Community Survey that they speak English less than very well.

Outreach efforts are made to reach out to minority populations through public notices in the local newspapers, direct mailings and information placed on state and local websites. MaineDOT also seeks assistance for participation through its subrecipients and accesses cultural information from statewide groups.

For example, MaineDOT regularly uses the following Minority Outreach Contact List to target outreach to Minority, LEP and otherwise underrepresented populations, like the disabled, for example:

**MaineDOT Minority Outreach Contact List**

<p><b>Cambodia</b> 35 Oxford St. Portland ME 04101 Contact: Sokhany Sieng 775-5073</p> <p><b>Maine Khmer Council Portland Housing Authority</b> 14 Baxter Blve. Portland ME 04101 Contact: Shawna Ohm, President 773-4753 Ext. 267</p> <p><b>Asian American Heritage Research Foundation Portland Multilingual Program</b> 83 Sherman St. Portland ME 04101 Contact: Grace Valenzuela 874-8135 email: <a href="mailto:graceval@gwi.net">graceval@gwi.net</a></p> <p><b>Maine Families with Children From Asia</b> 54 Saunders St. #2 Portland ME 04103 Contact: Christine Kukka (Portland) 883-1133 Contact: Coleen Quint (Lewiston/Auburn) 784-7726</p> <p><b>Office of Rehabilitation Services Maine Dept. of Labor</b></p>	<p><b>Chinese Association of Maine</b> 104 Berkshire Rd. Portland ME 04103 Contact: Cunli Jia, Vice President 775-6139</p> <p><b>Korean American Association</b> 626 Congress St. Portland ME 04101 Contact: Won Bae Park, President 772-8675</p> <p><b>Alpha One/Wheelchairs Unlimited</b> 127 Main Street South Portland, ME 04106 (207) 767-2189 (v/tty) (800) 640-7200 (v/tty) (207) 799-8346 - Fax <a href="http://www.alphaonenow.org">www.alphaonenow.org</a></p> <p><b>Disability Rights Center</b> P.O. Box 2007 Augusta ME 04338-2007 Voice and TDD: 626-2774</p> <p><b>NAACP Portland</b> P.O. Box 3631 Portland, ME 04104 Telephone: (207) 253-5074 Fax: (207) 253-5079 e-mail: <a href="mailto:naacpportland@hotmail.com">naacpportland@hotmail.com</a></p>
---	--

2 Anthony Ave. Augusta ME 04333 Voice: 624-5950 TTY: 1-888-755-0023	
--	--

Source: <https://www.maine.gov/mdot/civilrights/title-vi/> (*Minority and Outreach Contact Information*)

MaineDOT has developed a Public Participation Plan to detail the various public involvement opportunities for an activity or project; from formal public hearings, to comment periods, and surveys for the implementation of transit programs.

MaineDOT's PPP is a guide for ongoing public participation endeavors. Its purpose is to ensure that MaineDOT utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

MaineDOT's PPP also has a process in place whereby MaineDOT monitors and ensures its subrecipients, per federal regulations, also take reasonable steps to ensure that 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.

In addition to language access measures, other major components of MaineDOT's PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

MaineDOT requires its subrecipients to also establish a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

MaineDOT and its subrecipients make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities are encouraged and required in all PPPs, and may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

MaineDOT's Public Involvement Plan may be found at:

<https://www.maine.gov/mdot/planning/docs/MaineDOTPublicInvolvement1015.pdf>

## **MaineDOT's Targeted Minority and LEP Outreach Strategies:**

### **MaineDOT's Virtual Meetings Format**

The limitations brought about by the COVID-19 pandemic of 2020 present unique challenges to traditional public participation in MaineDOT's planning processes. Accordingly, MaineDOT recently adopted a virtual format to deliver transportation information to the public. This new virtual program is called the Public Involvement Management Application (PIMA). The Civil Rights Office will work with the Planning Office and the Bureau of Project Development to ensure that stakeholders are identified, and notices of the virtual meetings are published in accessible places and in a variety of languages spoken by LEP persons in the state. All who attend the virtual meetings are able to provide input into the process. One strategy that MaineDOT has undertaken to ensure LEP persons in the state can engage and access information in an accessible manner is to provide certified translators at all public meetings, upon request.

MaineDOT implemented PIMA in an effort to give many more community members the opportunity to attend public meetings than before when meetings were held solely in-person. The virtual meeting format, PIMA, has broadened MaineDOT's ability to provide meaningful access to minorities, LEP people, and other underserved and underrepresented people because:

- Virtual meetings improve meeting accessibility and eliminate physical barriers to meeting attendance. Virtual meetings allow people to participate from home or another location, reducing transportation costs and geographical barriers, as well as travel time for those who are busy working to support themselves and their families. Those with mobility issues or limited access to transportation particularly benefit from virtual meetings.
- Virtual meetings offer people greater flexibility because they accommodate different schedules and time zones, empowering people with work or family commitments, like childcare, to participate.
- Because participants can choose whether or not to reveal their video, virtual meetings can lessen the influence of biases or prejudices related to appearance, race, ethnicity, or other factors.
- Participating in virtual meetings that they may not otherwise have access to allows underserved and underrepresented people to widen their social and professional networks.

MaineDOT aims to ensure that no one, including minorities and LEP citizens, are impacted by the digital divide in participating in virtual meetings. In an effort to ensure that virtual information dissemination and collection of feedback is accessible to underserved and underrepresented people, MaineDOT aims to continue and expand the virtual meeting format while continuing to hold meetings in-person. MaineDOT seeks to offer all community members, including minorities and LEP citizens, a variety of accessible formats in which to engage and participate in transit decision-making processes. MaineDOT uses meeting participant registration information to track

attendance and document the demographic profile of meeting attendees. Public involvement processes include advisory and stakeholder committees and other transportation planning partners.

MaineDOT seeks to provide all Maine residents with as much information as possible and robust opportunities to participate in decisions affecting Maine's transit services.

### **Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations**

MaineDOT requires its subrecipients, during development of the Public Involvement Plan and/or planning for public engagement in general, to incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

MaineDOT requires subrecipients to implement, at a minimum, the best practice strategies identified herein, including holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, minorities and LEP communities, advertising meetings and hearings in English and languages that meet the Safe Harbor threshold, using radio, community television, and/or newspaper ads that serve LEP populations, employing different meeting sizes and formats including town hall type meeting formats, coordinating with community organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities, providing opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments, and providing notice of the availability of language assistance as needed.

MaineDOT also encourages subrecipients to exceed minimal requirements by:

- Utilizing supplemental outreach strategies such as surveys regarding public transit projects or proposed service changes.
- Partnering with community organizations to engage members of the public who are less likely to attend traditional public meetings (including LEP populations) through means such as surveys and focus groups. MaineDOT maintains a list of current and potential future community partners.
- Attending community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and ethnic/cultural groups to solicit feedback from diverse members of the public.
- MaineDOT encourages subrecipients to consult FTA Circular 4703.1 ("Environmental Justice Policy Guidelines for Federal Transit Administration Recipients") for additional strategies that may be incorporated into their Public Involvement Plans.

## **MaineDOT's Public Notification and Outreach Mediums**

- Print – Newspapers and other periodicals; particularly any prominent non-English publications.
- Advertising on message boards.
- Website – MaineDOT has assembled a comprehensive website.
- Social Media – MaineDOT utilizes Facebook, Instagram, You Tube, and X to engage the community.
- Radio – Public Service Announcements (PSAs).
- E-mail to community partners, stakeholders and media listings.
- Public Information Sessions.
- Public Hearings.
- Zoom virtual meetings.
- Legal Notices.

## **MaineDOT's Customers/Stakeholders**

MaineDOT's customers are those individuals or entities that use or rely on Maine's transportation infrastructure on a daily basis.

Our goal is to be the most trusted organization in Maine by being open, accountable, responsive, and proactively inclusive of diversity. To that end, it is important that MaineDOT properly identifies its customers.

Our customers include:

- Citizens
- Minorities
- Underserved populations like the low-income
- Limited English Proficiency (LEP) populations
- New Americans
- Newly arrived immigrants
- Businesses
- Freight Shippers
- Tourists
- Providers of Transportation Services
- Users of Bicycle and Pedestrian Facilities
- Users with mobility challenges and disabilities

Our stakeholders are individuals and groups who have a vested interest in some aspect of the transportation system or MaineDOT's actions. Although not a formal decision-maker, stakeholders play a crucial role in transportation decision making processes – their support can strengthen a decision or reverse it altogether. In other words, stakeholders are the groups or individuals most likely to support or oppose a project, investment, or initiative.

A first step in achieving meaningful public involvement in planning and project development involves identifying the individuals and groups likely to be affected by the project, those who have a "stake" in its outcome. For a given project, a typical list of stakeholders might include abutting property owners, frequent users of the facility (i.e., customers), municipal officials, transportation service providers in the area, and a wide range of interest groups. Representatives of the sponsoring federal agency are also considered stakeholders as they definitely have a stake in a project's outcome.

A typical list of stakeholders includes:

- Our Customers (general public)
- Our Partners
- Municipalities
- Utilities
- Abutting property owners
- Community organizations
- Diversity organizations
- Business organizations
- Transportation interest groups
- LEP/Minority interest groups and agencies
- Environmental interest groups
- Disability rights groups and agencies
- Contractors

Funds allocated by the FTA are primarily used by MaineDOT for Locally Coordinated Transit Plans, Locally Administered MaineDOT Projects (LAP's), and major studies, granted to subrecipients for transit services.

**Transit Providers.** MaineDOT partners with intercity, fixed route, flex route and demand response transit (bus) providers to support a broad range of transit services throughout Maine. MaineDOT administers a range of Federal Transit Administration (FTA) and state programs that financially support transit operations. MaineDOT's role is financial management, oversight, and monitoring to ensure that subrecipients of FTA funding meet a range of federal programs including the Americans with Disabilities Act, Title VI, and Environmental Justice, to name a few.

MaineDOT continues to be proactive in ensuring that subrecipients comply with federal requirements. Its systems include:

- Annual Grant Applications
- Quarterly/annual reports from subrecipients
- Regular meetings with transit providers
- Vehicle/facility inspections
- Site visits
- Training/technical assistance

All subrecipients must comply with all Federal requirements through completion of all Certifications and Assurances. These Certifications and Assurances, which are required to be signed by an authorized public official, are part of the formal contract process. MaineDOT, when submitting State grant applications to FTA, is also required to execute Certifications and Assurances both on behalf of the State and with respect to the local subrecipients. Subrecipients are also required to develop and submit Title VI plans with a public participation component.

**Locally Coordinated Transit Plans.** Locally Coordinated Transit Plans are prepared by MaineDOT in cooperation with the state's transit providers who receive FTA and/or state financial assistance. These plans address federal and state requirements for managing transit systems and obtaining a range of public input in plans for meeting transit needs. These plans involve contacting a broad range of potential stakeholders and interested parties and holding transit workshops in accessible locations to obtain public input on how best to provide transit services to meet the needs of transit-dependent populations. Notifications for these workshops include information that translation services are available upon request. These meetings are designed to provide the most inclusive means possible, are transit accessible and are targeted to include users and potential users. Outreach efforts are made to reach out to minority populations through public notices in the local newspapers, including cultural news outlets, direct mailings and information placed on state and local websites. MaineDOT also seeks assistance for participation through its subrecipients and accesses cultural information from statewide groups to ensure that the broadest net is cast and cultural considerations are made.

**Locally Administered MaineDOT Projects (LAP's).** A Locally Administered Project (LAP) is any MaineDOT project in which a municipality locally administers the development, design and construction of the project. Any municipal official or municipal engineer can locally administer a MaineDOT project if they are LAP Certified by the Department. MaineDOT provides LAP certification training to municipal officials and municipal engineers on federal and State requirements for transportation projects. This training consists of Civil Rights program requirements including Title VI requirements.

**Major Studies.** MaineDOT undertakes major studies whenever the potential exists for expanded or new transportation facilities, or for which potential investments could result in significant environmental impacts. Major studies must abide by the requirements of the Maine Sensible Transportation Policy Act (STPA) and the National Environmental Policy Act (NEPA), if any project phase uses federal funds. Major Studies include transportation feasibility studies, Environmental Assessments (EA) and Environmental Impact Statements (EIS). Each major study includes a project-specific public involvement process. This process includes identifying underserved populations. Examples of public involvement used for major studies include stakeholder advisory committees, internet sites, business surveys, formal public meetings and newsletters.

**Transit Providers and MaineDOT Civil Rights Oversight.** As set forth in MaineDOT's State Management Plan, all agreements entered into by MaineDOT on behalf of FTA, and to meet State requirements, require the contractor to certify that no person on the grounds of race, color, and/or national origin will be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part by FTA in accordance with Title VI. In addition, the State of Maine and all transportation providers



certify that a good faith effort is made to use Disadvantaged Business Enterprises as required by FTA Circular 5010.1D. All transportation providers who receive Federal and/or State subsidies are required to meet regulations delineated in the Certifications and Assurances. Technical support is provided in the form of distribution of guidance from the FTA to the providers in helping to meet civil rights requirements.

There is also coordination between the Bureau of Planning and the Civil Rights Office of the Maine Department of Transportation. The Civil Rights Office has responsibility for drafting, maintaining and updating a certified Disadvantaged Business Enterprise Directory as well as the Department's disadvantaged/Minority/Women's Business Enterprise Program. This Program outlines how the various administrative and operating units of the Department shall work together to carry out the policy established by the Department. Environmental Justice Assessments are done on a project-by-project basis.

MaineDOT personnel assigned to the Bureau of Planning, Freight and Passenger Services Office are assigned specific types of FTA Programs funds. In addition to providing technical assistance to local subrecipients, they also monitor the recipients as required to ensure compliance with the requirements of Title VI, EEO, and Section 105(f) (DBE). This is accomplished through the site visits with the provider agencies and administrative contacts as well as through Title VI Plans submitted by providers. During these processes the Multimodal Planning Division with assistance of the Civil Rights Office will review the minority and low-income population in the area served by the provider based on Census data and will also ask providers to identify underserved populations in their areas. The service provided and/or available to these identified groups will be determined by the provider and verified by the Office of Civil Rights in conjunction with the Bureau of Planning. The service provider will be given all the appropriate census data for their region and all information available to the MaineDOT concerning contacts in their area with groups representing minorities, low-income residents and those with Limited English Proficiency. At the time of the Annual Certifications and Assurances, service providers will be required to certify their compliance with Title VI by signed letter.

In addition, during the Locally Coordinated Transit Plan (LCP) planning process, all known representatives of these identified groups will be invited to participate. It will be through this process that the need for service using 5310 or 5311 funds will be identified and planned for within the limits of funding and regulations. MaineDOT will continue to be committed to coordinated service as it reaches out to these groups.

All RFPs directly advertised by the Department are posted on our Contractors web site. Access to MaineDOT DBE certified businesses is available on our contractor page and on the MaineDOT Civil Rights page at: <http://www.maine.gov/mdot/civilrights/dbe.htm>.

MaineDOT also assists subrecipients in developing Title VI Plans and complying with US DOT's Title VI regulations, including the general reporting requirements. MaineDOT provides the following information to subrecipients:

- Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and the recipients Title VI form.

- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when MaineDOT expects the subrecipient to notify MaineDOT of complaints received by the subrecipient.
- Demographic information on the race and English proficiency of residents served by the subrecipient. The information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
- Any other recipient-generated or obtained data, such as travel patterns, surveys, etc. that will assist subrecipients in complying with Title VI.
- Subrecipient DBE Reporting Forms and Instructions.
- Public participation processes and Title VI Plan assistance.

### Summary of MaineDOT’s Minority/LEP Targeted Outreach Efforts

The Freight and Passenger Services Office distributed “I Speak” cards and Title VI information to transit providers during site visits. Transit Provider Site Visits were conducted shown below. All other providers completed the Self-Certification Checklist for compliance provided in **Appendix III** herein. MaineDOT did not visit those agencies on-site during this reporting period.

#### Transit Providers/Dates of Site Visits

<b>5311 Sub-Grantees Site Visit Summary: 2023</b>	<b>Last Full Site Visit Date</b>	<b>Mode</b>	<b>Received Self Certification</b>	<b>Approved</b>	<b>Closed</b>	<b>Next full site visit due</b>
<b>Region One</b>						
Aroostook Regional Transportation System (ARTS)	4/12/2022	Virtual	5/1/2023	5/1/2023	5/1/2023	2027
<b>Region Two</b>						
Downeast Community Partners (DCP)	2/25/2021	Virtual	4/13/2023	4/13/2023	4/13/2023	2026
Downeast Transportation (DTI)	5/19/2021	Virtual				2026
West’s Transportation	5/27/2021	Virtual	9/14/2023	9/14/2023	9/14/2023	2026
<b>Region Three</b>						
Penquis (The Lynx)	11/4/2021	Virtual	3/23/2023	3/27/2023	3/27/2023	2026
<b>Region Four</b>						
Kennebec Valley Community Action Program (KVCAP)	1/28/2021	Virtual	4/12/2023	4/13/2023	4/13/2023	2026
<b>Region Five</b>						

Waldo County Community Partners	10/27/2022	Virtual				2027
Bath City Bus	5/17/2019	In-person site visit	4/12/2023	4/13/2023	4/13/2023	2024*
<b>Region Six</b>						
Regional Transportation Program (RTP)	1/14/2020	In-person site visit	3/31/2023	3/31/2023	3/31/2023	2025
<b>Region Seven</b>						
Western Maine Transportation Services	8/6/2019	In-person site visit	4/14/2023	4/25/2023	4/25/2023	2024
<b>Region Eight</b>						
York County Community Action Corporation	9/10/2020	Virtual	4/10/2023	4/10/2023	4/10/2023	2025
Southern Maine Planning Development						

**4. Language Assistance Plan**

Per FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Executive Order 13166 implements Title VI of the Civil Rights Act of 1964 by requiring meaningful access to all federally assisted programs and activities by persons with limited English proficiency (LEP).

Limited English Proficiency is defined as “individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.” LEP individuals are entitled by EO 13166 to language assistance with respect to a particular type of services, benefit or encounter.

Additionally, the US DOT has mandated that all ‘...recipients must take reasonable steps to ensure that such persons have meaningful access to the programs, services and information those recipients provide, free of charge...’

Compliance with Title VI includes Limited English Proficient (LEP) persons. Language barriers prohibit people who are LEP from obtaining services and information relating to transportation services and programs. Because people who are LEP may not be able to read instructions or correspondence written in English and may not understand verbal information, they often are

not aware of regulatory requirements and legal implications of the services they seek.

MaineDOT does not operate a transit system. MaineDOT's role is limited to financial management, oversight, and monitoring to ensure that subrecipients of FTA program funds meet a range of federal programs including Title VI requirements. As such, MaineDOT has little direct contact with LEP persons.

As required, MaineDOT developed a written LAP Plan (below). Using 2021 American Community Survey (ACS) Census data estimates, MaineDOT has evaluated data to determine the extent of need for translation services of its vital documents and materials. MaineDOT requires its subrecipients to perform the same LAP plan every review cycle.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, MaineDOT is eager to translate vital information into languages that LEP populations in the community can understand.

As you will see throughout our LAP, MaineDOT promotes Meaningful Access to LEP citizens by:

- Offering LEP individuals the ability to access/call and ask questions about MaineDOT programs and services.
- Offering LEP individuals options to talk in person to staff and ask questions.
- Ensuring that translation services are easily accessible and available to everyone.
- Posting signs and including translation statements in appropriate languages for vital documents.

MaineDOT continues to be proactive in ensuring that subrecipients comply with federal requirements. Its systems include:

- Annual Grant Applications
- Quarterly/annual reports from subrecipients
- Regular meetings with providers
- Vehicle/facility inspections
- Site visits
- Training/technical assistance

### **Assessment of Needs and Resources for LEP Populations in Maine Through the Four Factor Analysis**

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

This analysis considered four factors in determining the reasonable extent to which access shall be provided. Ultimately, a program, service, or activity with a demonstrated need for language services was deemed "critical," as indicated by the US DOT Policy Guidance Concerning Recipients' Responsibilities to LEP persons.

MaineDOT will continue to conduct public outreach to establish which particular language groups are interacting with public transportation services. This may include surveys with public transit employees and passengers to identify specific languages requiring translation within the larger “Other” language groups defined in the U.S. Census, American Community Survey.

The following four factors were considered for each program or activity conducted by this Department:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population. This information consisted of Census data relevant to the service area of each program or activity reviewed.
- 2) The frequency with which LEP individuals come in contact with the program, activity, or services. This information was based on anecdotal evidence and statistical records relating to previous encounters with LEP persons.
- 3) The nature and importance of the program, activity, or service.
- 4) Resources Available and Costs.

#### **A. Results of the Four Factor Analysis (see Appendix II for complete text of MaineDOT’s 2023 Four Factor Analysis).**

The LEP Safe Harbor Threshold provision of Title VI stipulates that written translation of vital documents must be provided for each LEP group that speaks English “less than very well” that constitutes either 5% of the total population to be served or 1,000 individuals (whichever is less).

##### **Factor # 1. Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population.**

MaineDOT has reviewed census data on the number of individuals in the state of Maine that have limited English Proficiency, as well as the languages they speak. Maine has a relatively low percentage of people who speak English less than very well. An analysis of Census data reflected in American Community Survey (ACS) data for 2017 – 2021 five-year data estimate release shows that statewide, there are 18,141 people over the age of 5, or about 1.4% of the total population of people over the age of 5 (1,293,114 people) who speak English less than very well.

Information from the 2017-2021 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other languages are needed to meet the needs of LEP persons.

There are six languages/census language “Other” groups/clusters in which the number of persons who speak English less than “very well” exceed the 1,000 person/5% threshold. They are: French, Haitian or Cajun, Spanish, Chinese (including Mandarin and Cantonese), Other Asian and Pacific Island languages, Other Indo-European languages, and Other and Unspecified languages.

Since MaineDOT does not operate a transit service, the most likely contacts with LEP persons will be at public meetings dedicated to transit planning efforts, or when an LEP individual files a complaint with MaineDOT.

<b>Maine</b>		
<b>Language Spoken</b>	<b>Estimated Number of Speakers</b>	<b>Percent of Total</b>
<b>Total:</b>	<b>1,293,114</b>	<b>100</b>
Speak only English	1,216,827	
Spanish:	11,920	
Speak English "very well"	9,208	
Speak English less than "very well"	2,712	0.209726289
French, Haitian, or Cajun:	33,695	
Speak English "very well"	27,260	
Speak English less than "very well"	6,435	0.497635939
German or other West Germanic languages:	4,185	
Speak English "very well"	3,695	
Speak English less than "very well"	490	0.037893024
Russian, Polish, or other Slavic languages:	2,801	
Speak English "very well"	2,297	
Speak English less than "very well"	504	0.038975682
Other Indo-European	6,209	
Speak English "very well"	4,647	
Speak English less than "very well"	1,562	0.120793681
Korean:	643	
Speak English "very well"	451	
Speak English less than "very well"	192	0.014847879
Chinese (incl. Mandarin, Cantonese):	3,102	
Speak English "very well"	1,731	
Speak English less than "very well"	1,371	0.106023135
Vietnamese:	832	
Speak English "very well"	303	
Speak English less than "very well"	529	0.040909
Tagalog (incl. Filipino):	1,026	
Speak English "very well"	771	
Speak English less than "very well"	255	0.019719839
Other Asian and Pacific Island languages:	3,026	
Speak English "very well"	1,876	
Speak English less than "very well"	1,150	0.088932608
Arabic:	1,438	
Speak English "very well"	902	
Speak English less than "very well"	536	0.041450328
Other and unspecified	7,410	
Speak English "very well"	5,005	
Speak English less than "very well"	2,405	0.185985149

Source: American Community Survey (ACS) data for 2017 – 2021 five-year data estimate.

**Factor #2: Assessment of Frequency LEP Individuals Come into Contact with MaineDOT Services or System.**

As indicated in discussion of Factor 1, MaineDOT is most likely to have contact with LEP individuals at public meetings associated with public transportation planning efforts. MaineDOT does not operate a transit service. MaineDOT has on-call translation via telephone available if requested. However, during the past three years, there have been no LEP persons calling MaineDOT to use the service.

Additionally, MaineDOT reviews the relevant benefits, services, and information provided by its subrecipients to determine the extent to which LEP persons have encountered these functions through site visit reviews, virtual reviews, and desk audits.

MaineDOT has implemented a survey process whereby it asks employees/subrecipients and community partners the following questions for its Four Factor Analysis:

**Employee/Subrecipient Survey Questions:**

1. What way(s) do you interact with riders?
2. How often do you come into contact with Limited English Proficient riders?
3. Please identify through percentages, how often you interact with the following languages during your workday:
  - English
  - Spanish
  - French
  - Chinese
  - Other languages (name the languages encountered)
4. What method of communication do you use when communicating with transit customers?  
(Mark all that apply)
  - Telephone
  - Face to Face
  - Email
  - Fax
5. How often do you interact with passengers who speak languages other than English in a typical work day?
  - Often
  - Sometimes
  - Rarely
  - Never
6. How effective do you feel you are at communicating with Limited English Proficient



passengers?

- Very Effective
- Moderately Effective
- Less Effective
- Unable to Communicate

**Community Partner Survey Questions:**

1. Do you encounter non-English speaking/ reading people?
2. Top three languages that you encounter?
3. How do you address language barriers?
4. Do you find language to be a barrier preventing you from providing service?

MaineDOT uses survey results to develop its LAP and to determine the frequency with which LEP persons come into contact with MaineDOT, and which languages in which to translate vital documents and provide language assistance.

Survey results can be provided upon request.

**Factor #3: The nature and importance of programs, activities or services to the LEP population.** Many LEP persons rely on public transportation for their mobility needs. The state’s public transit providers are responsible for ensuring that LEP individuals are not hindered from using local transit systems because they speak English less than very well. MaineDOT takes proactive measures to ensure through its extensive subrecipient oversight activities that the providers are upholding this responsibility.

For example, MaineDOT conducts regular meetings with subrecipients, performs vehicle and facility inspections, site visits and provides training and technical assistance for subrecipients to ensure they continue to comply with federal requirements around Title VI.

In addition, as the state transportation agency responsible for coordinating the statewide transportation planning process, MaineDOT must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups are part of the evaluation process. As detailed herein, MaineDOT provides extensive subrecipient oversight and ensures in its own planning projects that LEP, minorities, and other protected classes of persons are represented in the transportation planning process.

MaineDOT’s services are therefore important to LEP person’s lives, and must be accessible to everyone, regardless of ability to speak English.

**Factor #4: Resources available to the recipient and overall costs to provide LEP assistance.** Because of the low incidence of LEP persons in Maine overall, the cost to accommodate them has not been burdensome. There are a number of resources that are being provided. MaineDOT has distributed to all transit providers “I Speak” language Identification cards. MaineDOT rarely uses translation services but they are available under State contract. Costs for these services range in the \$50.00 – \$65.00/hr range. Cost at this time is minimal given the limited need and requests.

**Language Assistance Resources**

In order to ensure meaningful access to programs, services and activities, MaineDOT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps MaineDOT to determine if it communicates effectively with LEP persons and informs language access planning.

**Document Translation**

The department has translated and posted on its webpage the following documents based on the language needs present across the state:

- LEP language translation of the Title VI Notice to the Public;
- LEP language translation of the Title VI Brochure (which includes the complaint process);
- LEP language translation of the Title VI Complaint Form.

**External Resources**

Translation and Interpretation Services – MaineDOT has active contracts with the following professional language translation providers:

<b>In-Person Spoken Language Interpretation Services</b>
Language Partners – (replaces CCM)
House of Languages, Inc.
Maine Language Connect, LLC
<b>Telephonic Interpreting Services</b>
CTS / Language Link
Interpreters Unlimited
SLUSA
Propio LS, LLC
<b>Written Translation Services</b>
Latin American Translators Network

Source: <https://www.maine.gov/dafs/bbm/procurementservices/reports/statewide-contracts>

MaineDOT provides the following process and guidance for its meeting organizers when organizing public meetings at which LEP individuals may be encountered.

## **MaineDOT Accommodation Requests for Meetings**

### **Guidance for MaineDOT Meeting Organizers**

Note: For Project Development Public Meetings, the accommodation request will be directed to the Project Manager. For all other meetings and events, requests will be directed to the meeting organizer/contact person. This document helps to provide guidance on meeting such accommodation requests based on the type of meeting being held.

#### **Available Accommodations Based on the Type of Meeting/Event**

**On-Demand Meetings.** (Any videos for Virtual Public Meetings already provide closed captioning.)

- Language Translation.

**Live Virtual Meetings.** (Most platforms such as Zoom may provide some level of closed captioning. A live closed captioner is only provided if requested.)

- Language Translation
- American Sign Language Translation
- Live Closed Captioning

**In-Person Meetings.** (These meetings need to be held in confirmed ADA accessible locations.)

- Specific ADA Requests
- Language Translation
- American Sign Language Translation
- Assistive Listening Devices
- Reserved Seating for ADA Accommodations
- Other Requests not specified above

#### **Contacts/Resources for Providing Accommodation Requests**

##### **Language Translation, American Sign Language Translation, and Live Closed Captioning**

Master contracts were recently renewed. Try to give them seven days' notice, but they're pretty good at handling short notice requests as well.

The five companies that we will have master agreements with soon are:

- 3Play Media
- Automatic Sync Technologies
- Karasch & Associates
- Linguabee
- SimplyCaptions

If we want details of ASL services, translation services, etc., those master agreements are already in place and can be found here on the left-hand navigation:

<https://www.maine.gov/dafs/bbm/procurementservices/reports/statewide-contracts>

Each one of those different vendors will have their own parameters for how much notice they need. The 10 days we have in place is a good option for now.

**Assistive Listening Devices.** The hearing assistance devices are located in Creative Services.

**Reserved Seating for ADA Accommodations.** This will require the meeting organizer to save a seat for any requests made.

**Specific ADA Requests and Other Requests not specified above.** These will be request specific. For any help contact the Civil Rights Office.

MaineDOT personnel with frequent contact with the public receive training in the use of contracted telephone translation services. Language interpretation services can be arranged using “I speak Cards” and/or interpretation/translation agencies in Maine.

All language services purchased or contracted as a direct project cost must be documented and reported to the Title VI Coordinator for payment processing and statistical tracking and analysis. The Department of Transportation Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states: “A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, “reasonable steps” may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. “

Based on this guidance and to ensure accessibility for LEP individuals, MaineDOT has reviewed its resources and deemed that given the low level of LEP individuals in Maine, the Department will proactively translate vital documents into the languages identified by the LAP, and “Other” clustered languages will be translated upon request and/or oral translation will be provided upon request because it is difficult for MaineDOT to know specifically which language of many in the “Other” category/cluster is needed.

Although there will not be a fixed amount allocated from our yearly budget for the translation of documents, the cost associated with the necessary translation of documents in order to comply with LEP requirements will be allocated on an as-needed basis.

## **Safe Harbor Stipulation**

Federal law provides a "safe harbor" situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. Strong evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters as oral language services are needed and are reasonable.

### **B. Description of How MaineDOT Provides Language Assistance Services by Language.**

U.S. DOT guidelines require that recipients of federal financial assistance provide "meaningful access to programs and activities" by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. The Department takes reasonable steps to remove barriers for LEP individuals.

There are six languages/census language "Other" groups in which the number of persons who speak English less than "very well" exceed the 1,000 person/5% threshold. They are: French, Haitian or Cajun, Spanish, Chinese (including Mandarin and Cantonese), Other Asian and Pacific Island languages, Other Indo-European languages, and Other and Unspecified languages.

MaineDOT's complaint process (on the website) alerts French, Spanish, and Chinese (including Mandarin and Cantonese), speakers that complaint information is available in other languages. To date, there has been no demand for the form in any language.

## **MaineDOT Places the Following Requirements on Subrecipients:**

Subrecipients shall take steps to ensure that LEP individuals riding on transit in minority service areas will have access to bus schedules published in languages other than English, including, but not limited to French, Spanish, and Chinese (including Mandarin and Cantonese), depending upon the needs of the transit area.

Public notices and other vital public information or resources shall be printed in languages other than English where a concentration of LEP individuals requires the need for translation. Generally, this is when more than 5% of a census area, or more than 1,000 people in a census area, speak primarily the same language other than English. MaineDOT is in the process of translating all public notices in the languages identified as meeting the Safe Harbor threshold.

Any LEP individual directly impacted or benefiting from MaineDOT programs should be offered translation proactively as a rule. We require transit providers to hire a translation service to be available for transit users. The service should be similar to the AT&T Language Line service and available on all busses. <http://www.languageline.com/>

All programs and services shall make use of the Language Identification FlashCards to identify a language that an LEP individual can understand. The United States Census Language Identification Flashcard is available by contacting the Civil Rights Office or any Title VI liaison.

The Flashcards can be found on MaineDOT's website via the following link:

[http://www.maine.gov/dhhs/documents/Language\\_ID\\_Card.pdf](http://www.maine.gov/dhhs/documents/Language_ID_Card.pdf)

MaineDOT's Title VI Notice provides language assistance information translated in French, Spanish, and Chinese languages.

A list of language interpreters and information pertaining to interpreters and language assistance is on our website at <https://www.maine.gov/mdot/civilrights/title-vi/> or by contacting the Title VI/EJ Specialist or through the State of Maine Bureau of Procurement Services under "Interpreting Services" at their website:

<https://www.maine.gov/dafs/bbm/procurementservices/reports/statewide-contracts>

MaineDOT also provides information on Minority and Outreach information for special populations so that our employees and subrecipients have contacts to cultural agencies and information.

MaineDOT requires that subrecipients take other reasonable steps, where necessary. Other reasonable steps will depend on:

- The number and proportion of LEP persons potentially served by the recipient's programs or activities and the variety of languages spoken in the recipient's service area.
- The frequency with which LEP individuals are affected by the program or activity.
- The importance of the effect of the recipient's program on LEP individuals.

- The resources available to the recipient and the urgency of the situation.
- The level of services provided to fully English proficient people.
- Whether LEP persons are being excluded from services or provided a lower level of services.
- Whether the recipient has adequate justification for restrictions, if any, on special language services or on speaking languages other than English.

**C. Description of How the Recipient Provides Notice to LEP Persons about the Availability of Language Assistance.**

MaineDOT does not operate a transit system but does include in notices of public meetings that language assistance is available upon request.

MaineDOT provides specific guidance to subrecipients regarding language assistance for LEP persons as follows:

- **Planning Process:** Subrecipients are directed to follow all guidelines above and make use of the Language Translation Card Guide.
- **Public Meetings:** Subrecipients are directed to outreach ahead of time, find out how to communicate with the affected area, and make use of Language Translation Cards.
- **Property Acquisition:** Subrecipients are directed to bring Language Translation Cards and arrange for translators.
- **Construction:** Subrecipients are directed to have Language Translation Cards on hand and arrange for translators.
- **Transit Programs:** Subrecipients are directed to use Language Translation Cards as a polling tool, become familiar with languages used on the routes, consider publishing in most predominant languages other than English, and obtain a professional language translation phone service. For public processes and planning, subrecipients are directed to refer to the US DOT Guide.

MaineDOT ensures LEP persons are notified of the availability of language assistance through the following approaches:

- Following our Title VI policy statement included on our vital documents;
- On our website, with links to translations of vital documents in other languages;
- Through signs posted in our customer service and administrative offices;
- Through ongoing outreach efforts to community organizations, schools, and religious organizations;
- Through use of an automated telephone menu system in the most common languages encountered in Maine (French, Spanish, Chinese);
- Including the language translation line on all materials;
- Providing information tables with bilingual staff at community service events of interest to LEP groups; and

- Sending translated news releases and public service announcements about the availability of translated information to newspapers and broadcast media that target local LEP communities.

#### **D. Description of How MaineDOT Provides Translation of Vital Documents**

As stated above we inform the public of translation services on our Public Title VI Notice and our Title VI Complaint Form, to date, there have been no requests for a copy of this document by any LEP person. These vital documents are in the process of being translated into the languages that meet the Safe Harbor threshold. MaineDOT continues to monitor the need to prepare vital documents in the “Other” categories/clusters identified by the US Census, however, to date, there have been no requests to see these vital documents in any other languages aside from English.

MaineDOT also provides translation services to any who request those. Our website directs individuals to contact us if they need translation services. Those directions are in Spanish, Chinese, and French. The State of Maine contracts with a number of translation services which are linked on our website. That information is available to MaineDOT employees.

<https://www.maine.gov/dafs/bbm/procurementservices/reports/statewide-contracts>

#### **E. Description of How MaineDOT Monitors, Evaluates and Updates the Language Assistance Plan.**

On a triennial basis, MaineDOT’s Civil Rights Office reviews the FTA Title VI plan in conjunction with Census data and FTA requirements. The update process considers any developments that would impact the plan including complaints and requests for language assistance services. The Civil Rights Office also updates and makes available to transit providers information on available language translation services.

MaineDOT also receives information from subrecipients on any changes that they may encounter with LEP populations in their service areas. All subrecipients are required to provide MaineDOT with a Language Assistance Plan (LAP) and MaineDOT also shares our own information from our Four Factor Analysis with subrecipients.

#### **F. Description of How MaineDOT Trains Employees to Provide Timely and Reasonable Language Assistance to LEP Populations.**

The Director of MaineDOT’s Civil Rights Office provides training sessions as needed to MaineDOT Bureau of Planning and Project Development staff including how to provide timely and reasonable assistance to LEP populations.

MaineDOT also distributes to staff and has available a training document entitled “How to Work with a Telephone Interpreter” and language interpretation cards are downloadable available on our website:

[https://www.maine.gov/mdot/civilrights/docs/title6/Language\\_ID\\_Card.pdf](https://www.maine.gov/mdot/civilrights/docs/title6/Language_ID_Card.pdf)



These documents are also provided in **Appendix V**.

### **Training Summary**

MaineDOT's Office of Civil Rights regularly reviews subrecipients for Title VI compliance. Each review consists of a review of documents (i.e., operations manuals, annual reports, etc.) and interviews with subject matter experts among subrecipients.

MaineDOT's Office of Civil Rights implements a Title VI/Nondiscrimination Training Program that incorporates internal staff and external entities or subrecipients.

### **Internal Training:**

- The Office of Civil Rights provides Title VI/Nondiscrimination trainings. This training is conducted annually and is intended to provide Liaisons with an opportunity to discuss issues, ask questions regarding reviews conducted or to be conducted, review specific scenarios, and share experiences. It is also an opportunity to provide individualized training relating to Title VI.
- Nondiscrimination requirements and how to apply the requirements to the specific Federal Program Area.

### **External Training:**

Documentation training provided to project managers, inspectors, Project Development staff, and contractors. This annual training was held in various locations throughout the State.

### **External Civil Rights Training**

<b>Location</b>	<b>Date</b>
Fairfield	April 1, 2022
Scarborough	April 5, 2022
Presque Isle	April 7, 2022
Bangor	April 8, 2022
Wilton	April 11, 2022
Scarborough	April 26, 2022
Fairfield	April 27, 2022

### **Training Provided by the Office of Civil Rights**

<b>Training Topic(s)</b>	<b>Date</b>
Locally Administered Projects Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	November 2, 2022

Bureau of Project Development Construction Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	March 24, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 4, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 5, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 7, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 8, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 11, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 26, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 27, 2022
Locally Administered Projects Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	May 4, 2022

**Training Attended by the Office of Civil Rights**

<b>Training Topic(s)</b>	<b>Date</b>
National Disability Employment Awareness	October 20, 2021
Peer Exchange hosted by Minnesota DOT	October 27 - 28, 2021
CEI: Women in Small Business	November 4, 2021
U.S. Department of Transportation Public Meeting on Justice40 –Session 1	November 9, 2021
U.S. Department of Transportation Public Meeting on Justice40 –Session 2	November 16, 2021
19th Annual Employment Law Seminar	November 18, 2021
Davis – Bacon and Related Acts Outreach	November 30, 2021
Leadership Challenge	December 7 – 9, 2021
Moving to Action: The National Strategy on Gender Equity and Equality	December 14, 2021
Basics of Finding Data Using data.census.gov	January 18, 2022
Book Talk: Leading Global Diversity, Equity, and Inclusion: A Guide for Systemic Change in Multinational Organizations	January 27, 2022

Department of Labor Minimum Wage Executive Order Seminar	January 27, 2022
OFCCP Contractor Portal	February 1, 2022
Improving Diversity and Inclusion Programs in Public Transportation	February 3, 2022
Stream-lining the Way You Get Data	February 10, 2022
Invisible Warriors: African-American Women in WWII	February 14, 2022
DBE Training	February 14, 2022
DBE Training	February 15, 2022
DBE Training	February 16, 2022
DBE Training	February 17, 2022
How to Gain Richer Feedback and Engagement from the Public	February 17, 2022
EMDC Youth Information Session for Employers	February 22, 2022
Transportation Diversity, Equity and Inclusion Initiative	February 23, 2022
Creating Custom Tables using the American Community Survey Public Use Microdata Sample	February 23, 2022
Ending Retaliation, Securing Racial and Economic Justice in the Workplace	February 24, 2022
Equity in Focus	February 24, 2022
Davis-Bacon Compliance and the Bipartisan Infrastructure Law	February 28, 2022
USDOT DBE Contract Goal Setting Webinar	March 2, 2022
Understanding ADA	March 8, 2022
Using Population Estimates and Projections	March 10, 2022
Disadvantaged Business Enterprise (DBE) Program – New NAICS Code Official Guidance	March 10, 2022
Climate and Economic Justice Screening Tool	March 10, 2022
TPM Webinar	March 16, 2022
Public Meeting Accommodations	March 17, 2022
Service Contract Act (SCA) Compliance	March 30, 2022
Building Skills for Successful Transportation Program Delivery	April 12, 2022
Building Skills for Successful Transportation Program Delivery	April 13, 2022
CEJST Public Listening Session	April 15, 2022
Elation System Training for Contractors	April 19, 2022
DBE Prompt Payment	April 20, 2022
U.S. Census Bureau Top 3 Tools Tour	April 28, 2022
Reimagining Equity for Workers with Gaps in Employment History	April 28, 2022
Elation System Training for MaineDOT Staff	May 10, 2022
U.S. Census Bureau To Nest, or Not to Nest, That is The Quest	May 12, 2012
Good Faith Effort	May 17, 2022

DBA Compliance	May 18, 2022
Advancing Equity for AANHPI Women	May 25, 2022
Commercially Useful Function and Counting	June 9, 2022
Davis-Bacon Compliance	June 14, 2022
SCA Compliance	June 15, 2022
Understanding Contracts & Managing Consultant Contractors Performance	June 22, 2022
Recruiting and Retaining Women in Apprenticeships	July 19, 2022
Davis-Bacon and Related Acts Training	September 12, 2022
Transportation Diversity, Equity and Inclusion (DEI) Initiative	September 21, 2022

## 5. Advisory Committees

In 2015, the Maine Legislature established the Public Transit Advisory Council (“PTAC”) pursuant to 23 MRS §4209-A for the purpose of advising the Legislature and MaineDOT regarding public transit services in Maine. PTAC advises MaineDOT on the review and approval of Locally Coordinated Plans for regional transit and advises on any statewide strategic transit planning undertaken by MaineDOT, including short-term and long-term fiscal, operating and capital investments, and the integration of transit planning with the state’s Sensible Transportation Policy Act. The statute requires that PTAC’s membership must include:

- The MaineDOT Commissioner or his designee, and the following individuals appointed by the Commissioner:
  - One representative from the federally designated planning organizations for the Bangor, Kittery, Lewiston and Auburn and Portland regions;
  - One representative of private bus owners;
  - One representative of a statewide nonprofit agency that advocates on behalf of the elderly;
  - One representative of a medical provider;
  - One representative of a business that relies on public transportation;
  - One representative of a statewide association of planning and development agencies;
  - One representative of an organization representing persons with disabilities;
  - One representative of a nonprofit transit provider;
  - One representative of an economic development organization; and
  - One representative of an organization representing low-income persons.

In making the appointments, the Commissioner must ensure that rural and urban areas of the State are represented. In addition, the Commissioner shall invite at least two members of the Legislature joint standing committee on transportation matters and at least one representative of the Northern New England Passenger Authority to participate in PTAC meetings.

The PTAC makes biennial reports to the Governor of Maine and the joint standing legislative committees who have jurisdiction over transportation matters and health and human services matters. Their report must include an assessment of the level of transportation services provided to the public; recommendations for the level of service that should be provided and the cost of such service; and recommendations for the optimal coordination of transit services with other senior and veterans' services.

The PTAC also advises MaineDOT, and Maine's Departments of Health and Human Services, and Labor in matters concerning public transportation.

<b>Minority Representation on MaineDOT Committees</b>					
	<b>White or Caucasian</b> <i>(White alone, not Hispanic or Latino)</i>	<b>Hispanic or Latino</b> <i>(Hispanic or Latino of any race)</i>	<b>Black or African American</b> <i>(Black or African American alone)</i>	<b>Asian American</b> <i>(Asian alone)</i>	<b>American Indian and Alaska Native</b> <i>(American Indian and Alaska Native alone)</i>
<b>Maine Population</b>	92%	1.8%	1.4%	1.1%	0.5%
<b>Public Transit Advisory Council</b>	28 members  100%				

Source: 2021 United States Bureau of the Census, American Community Survey 5-year Estimates

**6. Ensuring Minority and LEP Representation on MaineDOT Committees**

MaineDOT understands diverse representation on committees, councils, and boards results in sound policy reflective of its entire population. As such, MaineDOT encourages participation from minority and LEP citizens.

As vacancies on its Public Transit Advisory Council (PTAC) become available, MaineDOT will make robust efforts to encourage and promote diversity. To encourage minority and LEP participation on its PTAC, MaineDOT will continue to reach out to community, ethnic, and cultural organizations to connect with minority and LEP populations and to announce PTAC membership vacancies.

Moreover, MaineDOT will continue to use inclusive methods to make PTAC participation realistic and accommodating to all citizens, especially those who are underrepresented and underserved. Such inclusive methods include scheduling meetings at times that are accessible to working people, or those who require transit to attend meetings.

**7. Ensuring Subrecipient Assistance and Compliance with Title VI**

Under the Civil Rights circular 4702.1B, MaineDOT will require and approve all subrecipients Title VI Plans every three years. This compliance activity will be reported to the FTA Region I Civil Rights Office, as required.

MaineDOT requires a five-year cycle for the FTA Compliance Reviews for its subrecipients with the exception of the Title VI Plans that will be submitted and reviewed every three years. A MaineDOT on-site visit to the subrecipient will be completed during the first year of a five-year cycle. For each of the remaining four years, the subrecipient will receive a checklist to self-certify that their agency is in compliance with applicable FTA guidelines. The subrecipient will complete the self-certifying checklist and return it to MaineDOT along with copies of any updated policies and procedures. If at any time during the four-year self-certifying period MaineDOT becomes aware of a status change and/or complaint, MaineDOT has the right to perform a random on-site

visit. After the fourth year of self-certifying, MaineDOT will schedule another on-site visit beginning the five-year cycle.

MaineDOT site visits include the review of Civil Rights policies and processes including Title VI/EJ, ADA and Disadvantaged Business Enterprise Programs and processes, and public outreach and complaint procedures. The complete site visit form and policy can be found in the MaineDOT State Management Plan.

Subrecipients are required to complete and submit Title VI Plans for their organizations to the MaineDOT. The MaineDOT has developed a template for subrecipients that they may use to assist them in the development of a Title VI Plan. A more detailed description of assistance provided to subrecipients can be found further in section **H. Description of Procedures MaineDOT uses to Assist Potential Subrecipients.**

Information on Title VI for subrecipients can be found at:  
<https://www.maine.gov/mdot/civilrights/title-vi/>

Title VI plans are due every three years on the first of October. Plans include or reference the following information:

- New signed Title VI Assurances
- A designated Title VI Coordinator responsible for Title VI compliance
- Appendix A & E included in contracts
- Title VI Complaint Process
- Four Factor Analysis
- Language Assistance Plan (LAP)
- Public Participation Plan

Providers required to submit their Title VI Plans to MaineDOT:

<b>FTA Funding by Type per Subrecipient/Contractor</b>	<b>5310</b>	<b>5311</b>	<b>5311 intercity</b>	<b>5339</b>
ARTS	x	x		x
City of Bangor				x
BSOOB Transit		x	x	
Casco Bay Island Transit District		x		
Concord Coach Lines			x	
Cyr Bus Lines			x	
Downeast Community Partners	x	x		x
Downeast Transportation		x		x
Greyhound			x	
KVCAP	x	x		x
LATC-citylink				x

Penquis-Lynx	X	x		x
Regional Transportation Program	X	x		x
South Portland Bus Service				x
WaldoCAP	x	x		x
West's Transportation		x	x	
Western Maine Transportation	x	x		x
YCCAC	x	x		x
Isle au Haut Boat Services		x		
Cranberry Isles		x		

**8. Title VI Equity Analysis for Construction Projects**

When the MaineDOT embarks on FTA funded construction projects not covered by the requirements of the current circular or National Environmental Protection Act (NEPA) it will complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The MaineDOT will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

Because it is not common for MaineDOT to undergo construction projects or facilities other than transit amenities, transit stations, or other facilities covered under the requirements of NEPA it will rely on the NEPA process to ensure equity for such facility development.

**9. Additional Information**

See Chapter V requirements, next page.



## **CHAPTER V REQUIREMENTS**

As a state agency, MaineDOT is required to meet the requirements of both Chapter III and Chapter V of FTA Circular 4702.1B.

### **A. General Requirements, Section 4 of Chapter III.**

See Federal Transit Administration Title VI/Environmental Program, Chapter III.

### **B. Requirements for Transit Providers, Chapter IV.**

Not applicable. The State of Maine is not a provider of fixed route transportation services.

### **C. Demographic Profile of Minority Populations**

#### **Maine's History of Immigration**

Maine has a robust history of immigration. While the original inhabitants of Maine were Native Americans, English and Scotch-Irish Protestants were the first Europeans to arrive. Immigrants from those locations - and their descendants - essentially formed the state as we know it today, accounting for the majority of the total population.

They were, however, not the only early migrants. The British drove French inhabitants out of Nova Scotia, which is to the east, in 1763, and many of them went to what is now Maine's northern border. Cajuns from Louisiana also began migrating northward, with many settling in Maine, notably the St. John Valley, where other French speakers from Canada had landed.

Throughout the 18th century, Irish and French immigrants continued to settle in Maine. However, Swedes began to arrive in the 1870s, establishing a community in Aroostook County.

Migrants of many nationalities eventually arrived in Maine over time. In addition to African Americans, Hispanics, Pacific Islanders, and Asians began to settle in the state. However, state reservations for Passamaquoddy and Penobscot peoples remained in the area, housing the state's few thousand remaining Native Americans.

#### **Minorities**

Based on the 2021 United States Bureau of the Census, American Community Survey 5-year Estimates (most recent data available), Maine has a small but growing minority population that is geographically spread across the state with concentrations in the urbanized areas served by direct recipient transit systems. In fact, 14 of Maine's 16 counties have minority populations of greater than 5%, and remaining counties have seen increases in their minority populations, according to the most recent available data. The summary table below shows white and minority populations for each of the counties. White is defined as one race, white alone, not Hispanic or Latino. Minority is defined as Hispanic or Latino, Black or African American, Asian, Native

Hawaiian or Pacific Islander, American Indian or Alaska Native, Other race, or Multi-racial. Maine as a whole has a minority population of 7.99%.

Approximately 67% of Maine's minority population lives in four counties:

- Androscoggin County: 11,571 people, of whom approximately 62%, live in urban Auburn and Lewiston, both of which are served by CityLink bus service.
- Cumberland County: 34,026 people, of whom approximately 66%, live in the Portland metropolitan area (Portland, Westbrook, South Portland and Scarborough), all of which are served by direct-recipient transit systems (Metro and South Portland Bus Service).
- Penobscot County: 11,142, of whom approximately 78%, live in the Bangor metropolitan area (Bangor, Brewer, Old Town, Orono, Veazie and Hampden), all of which are served by a direct-recipient transit system, Community Connector.
- York County: 15,858 people, of whom approximately 36%, live in Biddeford, Saco and Old Orchard Beach, all of which are served by a direct-recipient transit system, BS00B transit.

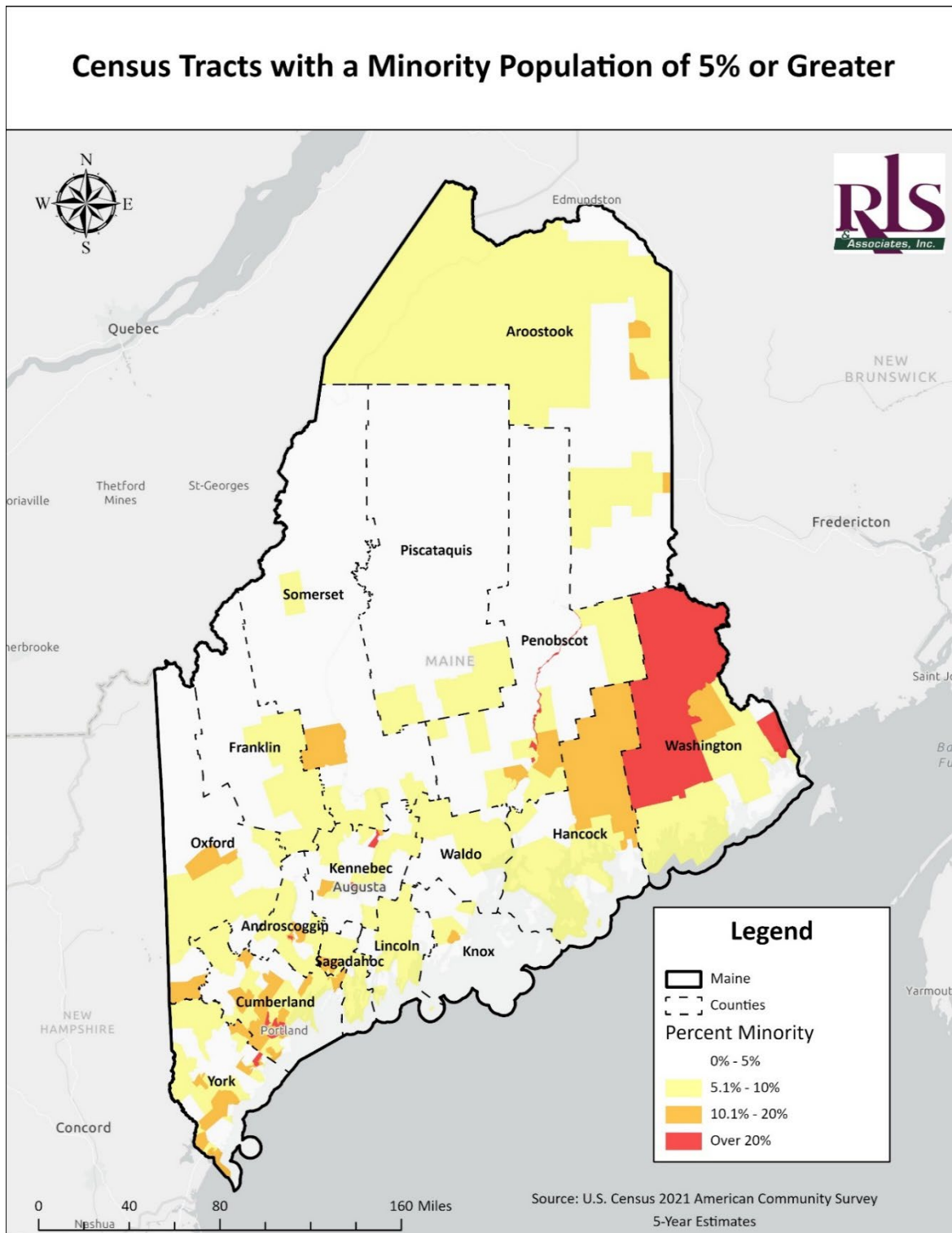
Cumberland and Washington Counties have the greatest percentages of minority populations with 11.31% and 11.26% respectively, while Androscoggin County follows with 10.48%. The Washington County minority population is comprised of the Native American Passamaquoddy Tribe, with some Penobscot and Maliseet presence. There is a Latin community in southern Washington County (and northern Hancock County) as well. The Androscoggin County minority population is comprised primarily of African immigrants. Otherwise, the metropolitan areas of Androscoggin and Cumberland Counties account for minority population concentrations.

The following table identifies minority populations by county:

<b>State of Maine</b>				
<b>Race Demographics by State/County</b>				
<b>County</b>	<b>Total Population (2021)</b>	<b>White</b> (One race, White alone, Non-Hispanic or Latino) <b>#</b>	<b>Minority</b> (Hispanic or Latino, Black, Asian or Pacific Islander, American Indian or Alaska Native, Other race, Multi-racial) <b>#</b>	<b>Minority %</b>
<b>Maine</b>	<b>1,357,046</b>	<b>1248581</b>	<b>108,465</b>	<b>7.99%</b>
Androscoggin	110,378	98,807	11,571	10.48%
Aroostook	67,272	62,809	4,463	6.63%
Cumberland	300,776	266,750	34,026	11.31%
Franklin	29,487	28,021	1,466	4.97%
Hancock	55,417	52,117	3,300	5.95%
Kennebec	123,293	115,799	7,494	6.08%
Knox	40,519	38,390	2,129	5.25%
Lincoln	35,065	33,053	2,012	5.74%
Oxford	57,807	54,379	3,428	5.93%
Penobscot	152,211	141,069	11,142	7.32%
Piscataquis	16,760	15,645	1,115	6.65%
Sagadahoc	36,530	34,210	2,320	6.35%
Somerset	50,424	48,011	2,413	4.79%
Waldo	39,618	37,382	2,236	5.64%
Washington	31,003	27,511	3,492	11.26%
York	210,486	194,628	15,858	7.53%

Source: 2021 United States Bureau of the Census, American Community Survey 5-year Estimates

The following map identifies Maine census tracts with minority populations of 5% or more.



## Non-American National Origin

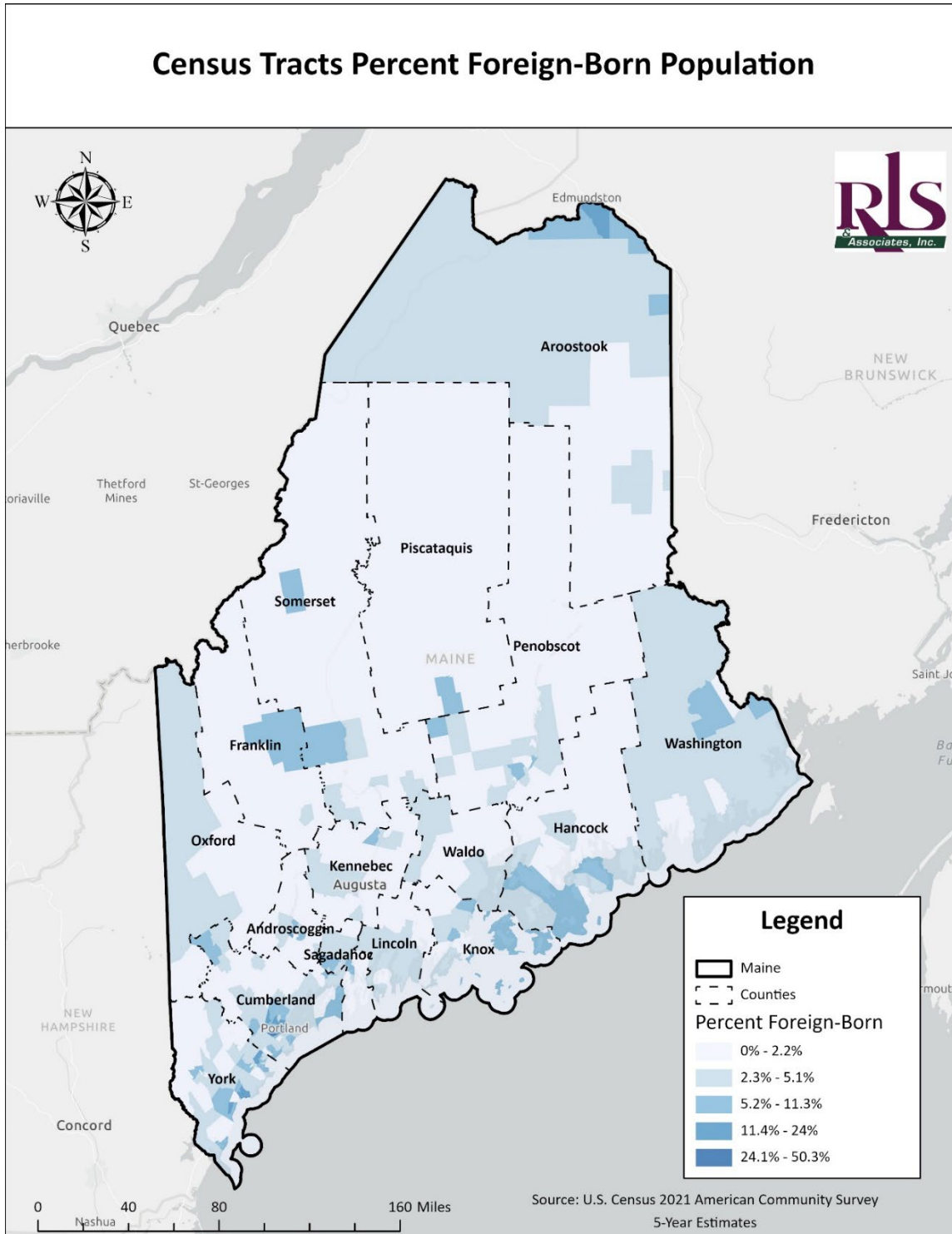
The map representing data on the national origin of Maine residents is similar in many ways to the maps of minorities. The core of Cumberland County again has the highest percentage of non-American-born persons. The Saint John River Valley of Aroostook County has large numbers of non-native born residents. Towns along the Canadian border show up more prominently in this map than the minorities map, reflecting a higher representation of French Canadians. The map of concentrations of non-American born residents shows many of these Canadian border towns with percentages higher than the state average, though most of these towns are sparsely populated. Cumberland and Androscoggin Counties have concentrations of non-natives, due to the Maine Refugee Resettlement Program centered in Portland (Cumberland County.) and Lewiston (Androscoggin County). There are relatively few towns in the western and eastern areas of the state with concentrations of non-natives, other than clusters around Augusta and Bangor.

The following table identifies non-native populations by county:

State of Maine				
Foreign Born Populations				
County	Total Population (2021)	Native Born #	Native Born %	Foreign Born %
<b>Maine</b>	<b>1,357,046</b>	<b>1,307,743</b>	<b>96.4%</b>	<b>3.6%</b>
Androscoggin	110,378	106,373	96.4	3.6%
Aroostook	67,272	64,503	95.9	4.1%
Cumberland	300,776	282,508	93.9%	6.1%
Franklin	29,487	28,925	98.1	1.9%
Hancock	55,417	53,865	97.2	2.8%
Kennebec	123,293	120,552	97.8	2.2%
Knox	40,519	39,338	97.1	2.9%
Lincoln	35,065	34,300	97.8	2.2%
Oxford	57,807	56,966	98.5%	1.5%
Penobscot	152,211	147,648	97.0	3.0%
Piscataquis	16,760	16,330	97.4	2.6%
Sagadahoc	36,530	35,334	96.7	3.3%
Somerset	50,424	49,611	98.4%	1.6%
Waldo	39,618	38,766	97.8	2.2%
Washington	31,003	29,951	96.6	3.4%
York	210,486	202,773	96.3	3.7%

Source: 2021 United States Bureau of the Census, American Community Survey 5-year Estimates

The following map identifies the foreign-born populations of Maine counties.



## Poverty

As a rural state without a large base of high-paying jobs—outside of Cumberland and Androscoggin Counties— poverty is more widespread in Maine than any of the other factors considered in the Title VI program. In the 2021 American Community Survey some 145,992 people were estimated to be in households that have incomes below the federal poverty threshold. (In dollar terms, that threshold varies by household size.) This number represents about 11% of the population for whom it is possible to determine poverty status. In comparison, 7.99% of residents are minorities, and 3.6 % of residents were not born in the United States. The highest concentration of low-income people resides in Cumberland County with 22,916 people. The cost of living and more urban settings reflect higher service needs in these areas.

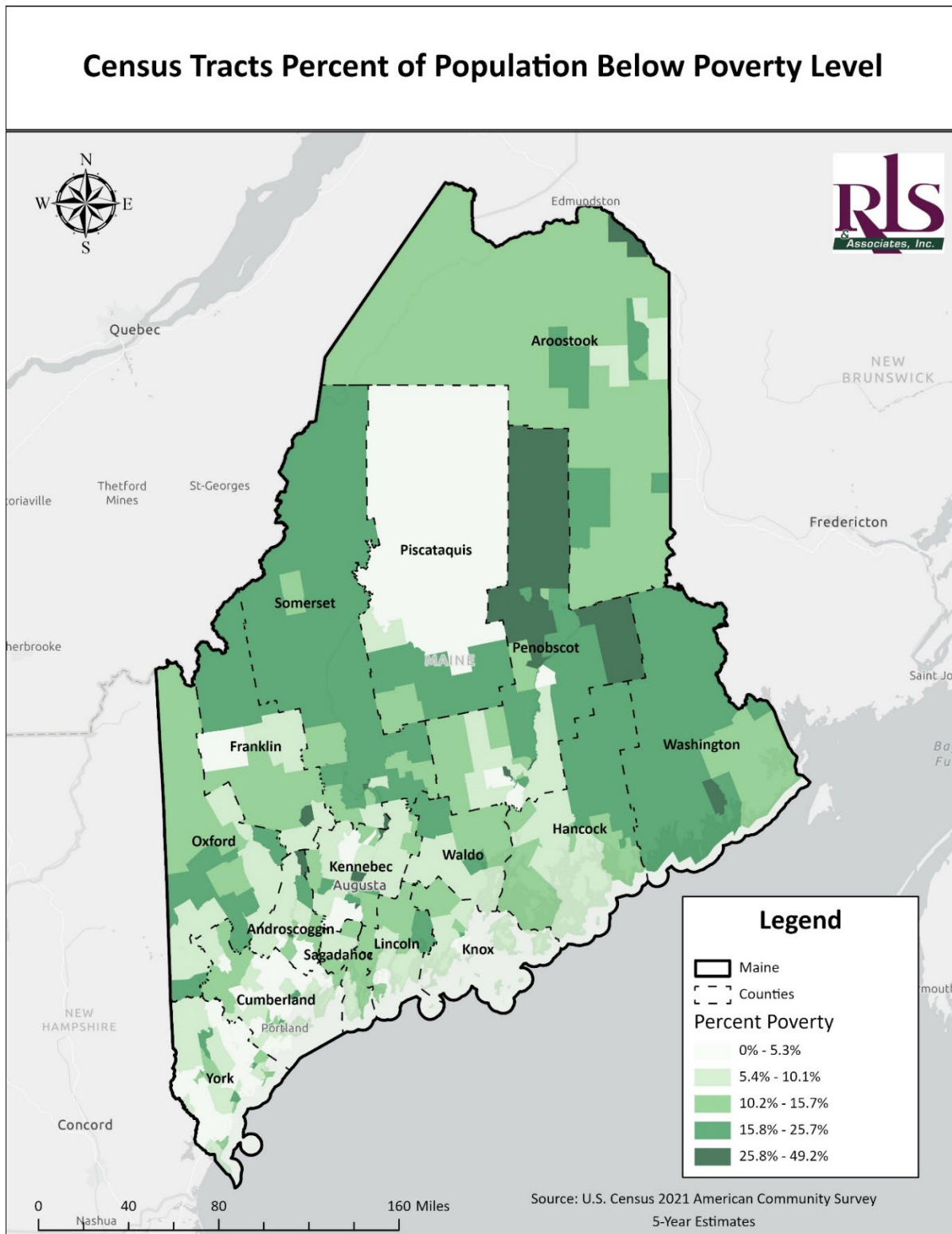
In spite of the high number of low-income people in Cumberland County the percentages of people in poverty in most of these communities is below the state average. The highest percentages of low income per county are the rural counties of Washington (18.7%), Somerset (17.9%), Piscataquis (16%), Aroostook (14.5%), and Oxford (14%).

The following table identifies low-income populations by county:

<b>State of Maine</b>			
<b>Poverty Status in the Past 12 Months</b>			
<b>County</b>	<b>Population</b>	<b># Persons below Poverty Level</b>	<b>% Persons below Poverty Level</b>
<b>Maine</b>	<b>1,357,046</b>	<b>145,992</b>	<b>11%</b>
Androscoggin	110,378	12,793	11.9
Aroostook	67,272	9,466	14.5
Cumberland	300,776	22,916	7.8
Franklin	29,487	3,367	11.9
Hancock	55,417	5,548	10.3
Kennebec	123,293	14,380	12.0
Knox	40,519	3,613	9.3
Lincoln	35,065	3,665	10.6
Oxford	57,807	7,990	14.0
Penobscot	152,211	20,031	13.8
Piscataquis	16,760	2,622	16.0
Sagadahoc	36,530	4,061	11.2
Somerset	50,424	8,866	17.9
Waldo	39,618	5,064	13.0
Washington	31,003	5,616	18.7
York	210,486	15,994	7.7

Source: 2021 United States Bureau of the Census, American Community Survey 5-year Estimates

The following map identifies the poverty percentages of Maine census tracts.





## D. Demographic Impacts of FTA/MaineDOT Funding

### Funding Distribution Analysis

The tables and charts below display the percentages of the minority and the white population by year-round bus route service area. For the purpose of this analysis, funding for bus operations was separated by fixed route services (all of which are direct FTA recipients), flex route service and demand response services.

### Bus Route Service Area and Funding

#### Fixed Route Services

Service	Service Population <sup>1</sup>	White # <sup>1</sup>	White % <sup>1</sup>	Minority # <sup>1</sup>	Minority% <sup>1</sup>	MaineDOT, FTA Funding <sup>2</sup>
Metro	209,491	177,247	84.61%	32,244	15.39%	\$6,382,631
S. Portland Bus	26,428	22,992	87%	3,436	13%	\$1,458,791
Citylink	117,660	105,689	89.83%	11,971	10.17%	\$1,276,560
Comm. Conn.	41,526	37,297	89.82%	4,229	10.18%	\$2,339,400

Note: Metro serves the greater Portland area; the South Portland Bus services the City of South Portland; Citylink serves the Cities of Lewiston and Auburn, and Community Connector serves the greater Bangor/Brewer area.

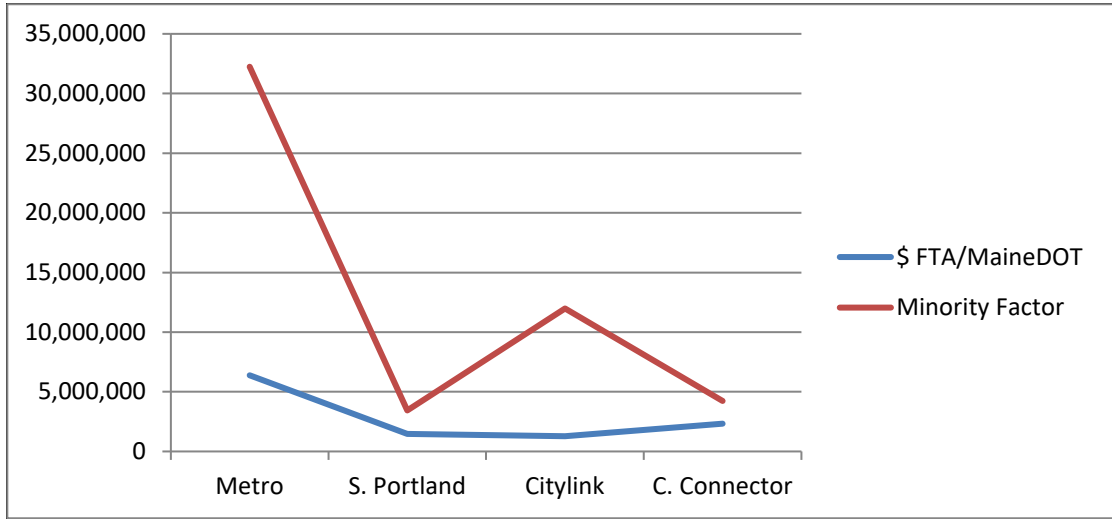
<sup>1</sup>Source: American Community Survey 5 Year Estimates, 2021

<sup>2</sup>Source: MaineDOT, FFY 2023

Please note that the MaineDOT/FTA Funding amounts do not include any recent CARES/CRRSAA/ARPA contract amounts as those were unusual.

The data in the table above is presented in chart form below. The funding line is the total amount of FTA and MaineDOT funding. The minority factor is the minority population multiplied by 1,000.

### Fixed Route Funding vs Minority Factor



## Flex Route Services

Service	Service Population <sup>1</sup>	White # <sup>1</sup>	White % <sup>1</sup>	Minority # <sup>1</sup>	Minority % <sup>1</sup>	MaineDOT, FTA Funding <sup>2</sup>
Bath CityBus	8,718	8,292	95.11 %	426	4.89%	\$154,949
Brunswick Link	16,554	14,728	88.97 %	1,826	11.03%	<i>part of WMTS overall allocation</i>
Kennebec Explorer	50,712	46,674	92.04 %	4,038	7.96%	\$583,520
BSOOB Transit	51,488	46,693	90.69 %	4,795	9.31%	\$1,659,720
Sanford Transit	21,812	20,063	91.98 %	1,749	8.02%	<i>part of YCCAC overall allocation</i>

Note:

- Bath CityBus serves the City of Bath; \*Bath service now operated by Western Maine Transportation
- Brunswick Explorer serves the Town of Brunswick; renamed to Brunswick Link, now fixed route with ADA paratransit
- Kennebec Explorer serves Waterville, Winslow, Augusta, Farmingdale, Hallowell and Gardiner;
- BSOOB Transit serves Biddeford, Saco and Old Orchard Beach;
- Sanford Transit serves the Town of Sanford.

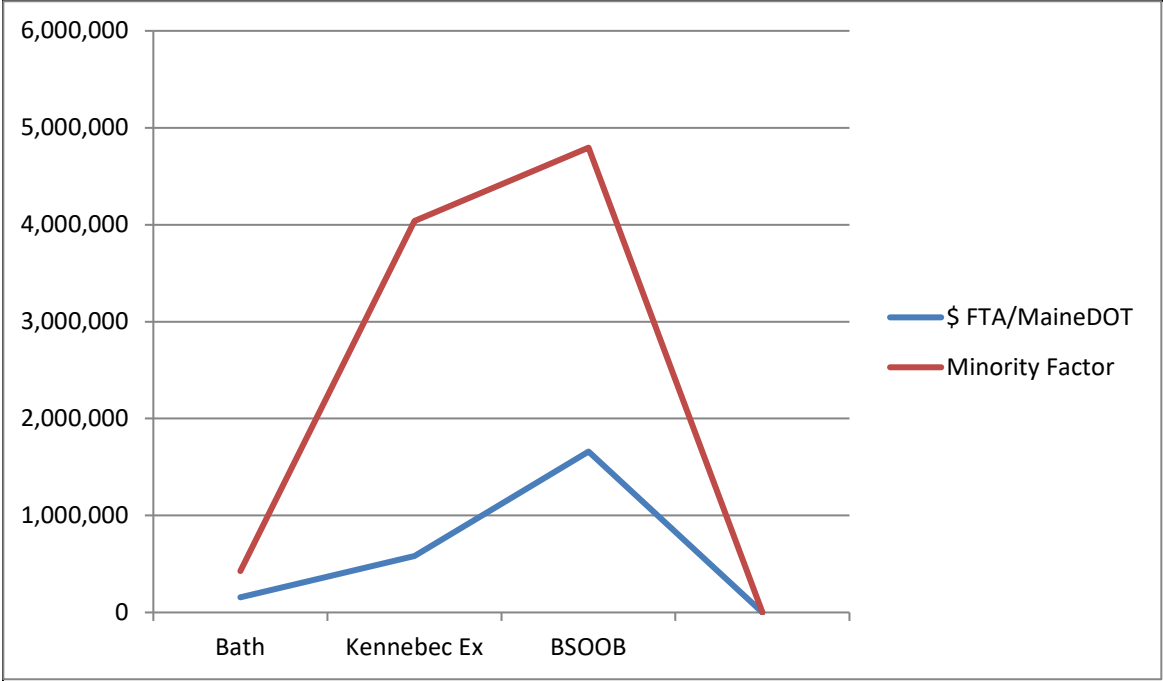
<sup>1</sup>Source: American Community Survey 5 Year Estimates, 2021

<sup>2</sup>Source: MaineDOT, FFY 2023

Please note that the MaineDOT/FTA Funding amounts do not include any recent CARES/CRRSAA/ARPA contract amounts as those were unusual.

The data in the table above is presented in chart form below. The funding line is the total amount of FTA and MaineDOT funding. The minority factor is the minority population multiplied by 1,000.

**Flex Route Funding vs Minority Factor**



## Demand Response Services

Service	Service Population <sup>1</sup>	White # <sup>1</sup>	White % <sup>1</sup>	Minority# <sup>1</sup>	Minority % <sup>1</sup>	MaineDOT, FTA Funding <sup>2</sup>
ARTS	68,132	63,650	93.42%	4,482	6.58%	\$679,786
DCP, DTI, West's	85,949	79,171	92.11%	6,778	7.89%	\$1,470,513
Penquis	168,582	156,330	92.73%	12,252	7.27%	\$979,730
WCAP d/b/a MCPT	173,271	162,660	93.88%	10,611	6.12%	\$569,798
RTP	279,237	247,125	88.5%	32,112	11.5%	\$1,106,678
WMTS	197,672	181,207	91.67%	16,465	8.33%	\$1,585,401
YCCAC	210,486	194,628	92.47%	15,858	7.53%	\$918,160

Note:

- ARTS serves Aroostook County plus Patten in Penobscot County and Danforth in Washington County.
- DCP serves Hancock and Washington Counties exclusive of Danforth in Washington County. The funding column includes FTA and MaineDOT funds for year-round services provided by Downeast Transportation (DTI) in Hancock County, and West's in Washington County.
- Penquis serves Penobscot County exclusive of Patten and Piscataquis County.
- WCAP, doing business as Mid-Coast Public Transportation, serves Waldo, Knox, Lincoln and Sagadahoc Counties as well as the towns of Brunswick and Harpswell in Cumberland County.
- RTP serves Cumberland County exclusive of Brunswick and Harpswell.
- WMTS serves Androscoggin, Franklin and Oxford Counties.
- YCCAC serves York County.

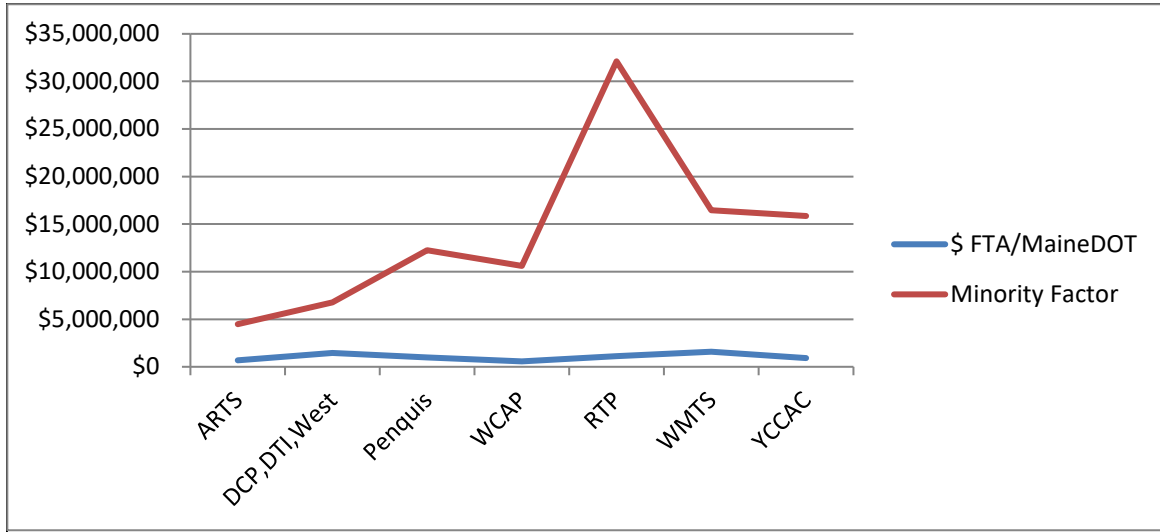
<sup>1</sup>Source: American Community Survey 5 Year Estimates, 2021

<sup>2</sup>Source: MaineDOT, FFY 2023

Please note that the MaineDOT/FTA Funding amounts do not include any recent CARES/CRRSAA/ARPA contract amounts as those were unusual.

The data in the table above is presented in chart form below. The funding line is the total amount of FTA and MaineDOT funding. The minority factor is the minority population multiplied by 1,000.

### Demand Response Funding vs Minority Factor



## **E. Disparate Impacts Analysis**

Disparate impact is a way to prove discrimination based on the effect of a policy or practice rather than the intent behind it. Laws that prohibit discrimination apply not only to intentional discrimination, but also to apparently neutral policies and practices that have a disproportionate adverse effect on members of a protected class. An example may be providing and planning for transit services that serve a heavily populated area but do not take into consideration of cultural or minority populations that need the service in other areas.

Based on data contained in the preceding tables, the percentage of minority populations is highest in the service areas of the following fixed route providers. As might be expected, the highest percentage is in Metro's service area (15.39%) which includes the City of Portland and vicinity. The second-highest percentage is South Portland Bus (13%) which serves the City of South Portland. The third highest percentage is the Community Connector (10.18%) which serves the greater Bangor/Brewer area. The area with the fourth highest minority percentage is the City Link (10.17%) which serves the Cities of Lewiston and Auburn. Compared with the past, minority populations have increased statewide, ranging from 15.39% for the urbanized greater Portland area served by Metro to a low of 4.89% for the Bath City Bus. Given that funding is higher in areas with higher minority population percentages, it is difficult to identify any disparate impacts of funding decisions based on race, color, or national origin.

Based on a review of the charts on the preceding pages, the funding distribution by providers corresponds relatively well with the distribution of minority populations across the state.

- For fixed route services, federal and state transit dollars are higher for those providers with higher numbers of minority residents, and lower for those with lower numbers (the minority factors shown in the chart correspond to numbers of non-white residents).
- For flex route providers, federal and state transit dollars are generally higher for those providers with higher numbers of minority residents, and lower for those with lower numbers.
- For demand response providers, federal and state transit dollars are generally higher for those providers with higher numbers of minority residents, and lower for those with lower numbers, but there are three exceptions. WMTS receives more money relative to its minority population than might initially be expected, but this is because it serves a three-county area with relatively low percentages of minority residents. YCCAC also receives more money relative to its minority population than might initially be expected, but this is primarily due to York County's relatively small minority population, and the fact that YCCAC operates several small systems such as the WAVE commuter service and the Shoreline Explorer.

The conclusion of this analysis, based on the fact that there is slight variation in the percentage of minorities across the state (except in the largest urban areas), and the services with the higher percentages of minorities generally receive greater funding, is that there are no apparent disparate impacts of funding decisions with respect to race, color or national origin.

## **F. Description of Statewide Transportation Planning Process that Identifies Transportation Needs of Minority Populations.**

There are several components of Maine’s transportation planning process, including the work of MaineDOT’s Civil Right Office, the work of MaineDOT’s Freight and Passenger Services Division, and the use of the Public Transit Advisory Committee established by Maine statute. As previously described, the planning process includes:

MaineDOT personnel assigned to the Bureau of Planning, Freight and Passenger Services Division, are assigned specific types of FTA Programs. MaineDOT staff provides technical assistance and monitor the subrecipients as required to ensure compliance with the requirements of Title VI, EEO, and Section 105(f) (DBE). This is accomplished through the Site Visits to the provider agencies and administrative contacts. The service provided and/or available to identified groups is determined by the subrecipient and verified by the Office of Civil Rights in conjunction with the Freight and Passenger Services Division. The subrecipient will be provided with all the appropriate census data for their region and all information available to the MaineDOT concerning contacts in their area with groups representing the minorities, low-income residents and those with Limited English Proficiency. MaineDOT will review Title VI Plans submitted by subrecipients to further identify underserved and minority populations in those areas. At the time of the Annual Certifications and Assurances, providers will be required to provide signed Title VI Assurances.

### **Advisory Committees**

The Public Transit Advisory Council is composed of knowledgeable people with a diversity of affiliations and networking capacity to extend MaineDOT’s reach into targeted population. These connections were used extensively during development of the 2019-23 Locally Coordinated Plan to provide outreach through and received input from efforts performed by partner organizations, such the Metropolitan Planning Organizations, Maine Council on Aging and various other organizations working with people with disabilities. Through these networks, MaineDOT received input from the Portland immigrant community and attended statewide outreach events for veterans and people with disabilities.

### **Metropolitan Regional Advisory Committees**

MaineDOT staff attend meetings organized by the MPOs and urban transit providers, who are also performing outreach to minority populations within their service areas and have picked up pertinent information through those on-the-ground outreach efforts.

### **Key Informant Interviews**

Key informant interviews were conducted by MaineDOT to ensure that tribal member transit needs were understood and included in recommendations within the Locally Coordinated Plan. MaineDOT staff have offered assistance to the tribal planners to prepare FTA grant applications and connect the tribes with regional transit resources. The notes from these consultations appear in the Locally Coordinated Transit Plan Appendix.



## **Regional Transit Forums**

MaineDOT hosts regional transit forums to assist in the preparation of Maine's Locally Coordinated Transit Plan (LCP). For example, six forums were held in 2018 to advise MaineDOT on future public transit needs, strategies, and priorities across Maine. The forums were held in partnership with age-friendly groups, planning commissions, regional transit agencies, municipal governments, health care centers, etc. In-person Regional Transit Forums had been limited during the global COVID pandemic (2020 – 2022), however, MaineDOT is gearing up to reinvigorate the in-person Regional Transit Forums process.

## **G. Procedures MaineDOT Uses to Pass-through FTA Financial Assistance in a Non-discriminatory Manner**

Title VI prohibits discrimination on the basis of race, color and national origin. In an effort to make investments that would not impose disproportionately high and adverse effects on minority or low-income populations; MaineDOT and subrecipients utilize the charts and maps included in Chapter V, Section C to plan statewide demand response and flex route projects. The State is divided into eight regions defined, generally along county lines, in order to distribute funds on a fair and equitable basis for the rural 5310 elders and persons with disabilities and non-urbanized area 5311 funds. In each region, the use of a formula includes the three basic factors of population demographics including minority populations, road mileage and square miles. Approximately 30% of rural funding remaining is distributed by this formula and the balance is assigned to projects which meet needs identified by MaineDOT through the regional Locally Coordinated Plans (LCP).

The “non-formula” projects are solicited in a variety of ways. Periodically, MaineDOT conducts a series of public meetings as part of the LCP planning process and solicits project ideas and comments to determine gaps in service, under-served minority populations and inadequate funding distribution. In addition, MaineDOT publishes a 20-Year Long Range Plan which receives public comment, as well as, a capital 3-year calendar work plan and 4-year Statewide Transportation Improvement Program (STIP). All of these plans go through an extensive public comment process and contain projects solicited and chosen from both external and internal sources. MaineDOT publishes legal notices announcing meetings and grant programs; and, invites inquiries and applications from the public and potential transportation providers. All public meetings are held as part of the public involvement process, noticed in accordance with requirements of Title VI, held in locations that are conveniently situated with respect to minority and low-income populations and with access to public transit whenever possible. Since 1970, the population statistics from the most recent United States Department of Commerce Census have been used to determine percentages of minority population, non-American and elderly populations. Since the allocation of 49 USC §5311 Federal funds is based on Maine's rural and small urban population, the urbanized populations of the Portland, Lewiston/Auburn, Bangor and Kittery areas were not included in their respective regions. Mileage statistics were derived from the Maine Department of Transportation's State Highway Mileage Table. Road mileage located in the four urbanized sections mentioned above was not included in those regions' computations. It was also decided that a density factor pertaining to the road miles per 1,000 persons should be used. This was accomplished by dividing the region population into the region road miles. The

density factor and the population factor were given an equal weight in determining each region's percentage of the total allocation. (Appendices G and H are copies of the formula used to disburse 49 USC §5310 and §5311 allocations, respectively).

With the inception of MAP-21 and FAST, MaineDOT receives additional Section 5310 funds and a new program, Section 5339 funds. The new Section 5310 funds are for the small urban and UZA areas. These are distributed by MaineDOT based on a combination of need and formula, and it is anticipated that these funds will become competitive in the future. The new Section 5339 funds are apportioned to Maine in three categories: rural, small urban, and UZA. These funds are competitive in nature but may also be designated to transit agencies to meet the needs of minority & low-income and the disability community.

### **Application Process and Evaluation of Projects**

In general, transit projects funded by MaineDOT are funded in part by formula grants and need. In all cases MaineDOT requires that transportation providers submit an application for funding. Applicants are responsible for ensuring Title VI program development and identifying minority and low-income population in the areas served. Following submission of an application or applications to MaineDOT, the Bureau of Planning takes the following steps:

1. Confirm Title VI compliance;
2. Review projects to determine eligibility;
3. Identify projects funded by formula;
4. Prioritize training needs; and
5. Prepare a Program of Projects based on available funding.

### **Specific Procedures for Distributing FTA Section 5311 Funds are as Follows:**

**Priority One** - The first funding priority is to continue operating assistance to current Section 5311 recipients where there exists a continuing demand for public transportation service and a need for federal subsidy. Emphasis is placed on funding for services that offer mobility for transit-dependent, minority populations, multiple county or regional transportation systems.

**Priority Two** – The second priority for funding is to support capital projects for existing systems. If and when capital funding is made available, eligible requests will be prioritized on the following basis:

- Highest percentage of minority populations and the elderly;
- Replacement of old, worn-out or unsafe revenue vehicles;
- Purchase of vehicles for the expansion of existing services or purchase of additional vehicles to meet demonstrated capacity problems on current routes;
- Purchase of miscellaneous capital equipment (e.g. radios, shop equipment, etc.); and,
- Construction and/or renovation of facilities.

**Priority Three** – The third priority is the funding of operating and capital expenses for new rural transportation systems. When establishing new service, the Department will give priority to

those areas which are identified in minority and economically distressed counties. Other areas may also be considered.

Before MaineDOT will approve any new rural transit project, the following must be determined:

- **Goals and Objectives.** An agency should determine why and to whom it wants to provide transportation. As the mission of the transportation program is clarified, there are specific issues that will shape a transportation system. These include determining the minority and low-income populations, the geographic area to be served, the area's greatest transportation gaps and needs, and current transportation resources.
- **Needs Assessment.** Once the goals, objectives and service area are defined, a provider must determine what transportation needs are not being met by conducting a needs assessment within the proposed service area and focused to better meet the needs of minority, low-income and disabled populations. This needs assessment will aid a system in determining:
  - Transportation needs for human services clients as well as the general public;
  - Revenue sources to provide an adequate level of service to meet these needs;
  - Existing transportation services, both public and private as well as existing vehicles in the service area, including their type, age, condition, seating capacity and whether for sale, lease or shared use;
  - New vehicle and other capital needs;
  - Municipal government support of rural transit;
  - A multi-year financial plan. MaineDOT reserves the right to fund projects aimed at meeting transit needs that may not be identified through the public processes outlined below.

### **Locally Coordinated Transit Plans and Project Approval Process**

The State is divided into eight geographic regions for distribution of the Maine Department of Transportation administered transit funds. Every five years a Locally Coordinated Transit Plan (LCP) is prepared for each of the eight regions. By State law the Plan is approved with input from the Public Transit Advisory Committee including the Department of Health and Human Services.

The LCP submitted for each regional public transportation agency provides for the following:

1. Maximum feasible coordination of funds among all State agencies that sponsor transportation in the region;
2. Development and maintenance of a permanent and effective transportation system, with particular regard to seniors, persons with disabilities and low-income persons.
3. Participation of private transit operators in the service area to the greatest extent possible.
4. Conformity with general operational requirements as may be prescribed by the Commissioner of MaineDOT.

5. MaineDOT may transfer any amount of the State's apportionment for urbanized areas to any urbanized area in the State or with the Governor's permission, to supplement the State's 49 USC §5311 Program. MaineDOT will make such transfers only after consultation with the responsible local elected officials and publicly-owned operators of transportation services in each area to which the funding was originally apportioned.

Public meetings are held periodically to assess needs, determine performance, communication levels, coordination of service and distribution of funds. Prior to submission of the plan to MaineDOT for approval, the plans are subjected to public meetings at the local level.

Approval of each plan is given by MaineDOT with input from the Public Transit Advisory Committee including the Department of Health and Human Services. This is currently done through the Governor's Interagency Coordinating Committee consisting of representatives from the various offices of the Department of Health and Human Services and the Department of Labor. Upon approval, all agencies, groups or organizations named to participate in the provision of service in accordance with the regional operation plan, become eligible to receive funds administered by MaineDOT. Separate contracts are then written between MaineDOT and each provider agency. MaineDOT's Locally Coordinated Plan for 2019-2023 can be found at: <https://www.maine.gov/mdot/transit/publications/lcp/>

#### **H. Description of Procedures MaineDOT Uses to Assist Potential Subrecipients**

There are a number of procedures that Maine utilizes to assist potential subrecipients in applying for funding, including applicants that would serve predominantly minority populations.

**Advisory committee input.** As more fully described under section F. the Bureau of Planning relies on the Public Transit Advisory Committee (PTAC) described above to help identify transit needs and opportunities.

**Assistance to individuals and groups.** As a follow-up to contacts made at planning meetings and/or in response to direct requests for assistance, MaineDOT Bureau of Planning staff meet on a regular basis with potential subrecipients to assist them in preparing the studies, documentation, and application process for receiving FTA funds.

**Information and data analysis.** As stated above, MaineDOT assists subrecipients in the development of Four Factor analyses and public\_participation planning. We have created documents to assist in these plans. MaineDOT has also created more detailed maps of each county and their minority populations by census tract. These maps and data can be accessed through our website under the heading "General Title VI Information, Minority Populations By County" at: <https://www.maine.gov/mdot/civilrights/title-vi/>

# MAINE DEPARTMENT OF TRANSPORTATION NONDISCRIMINATION POLICY STATEMENT

## TITLE VI (FTA)

The Maine Department of Transportation is committed to ensuring that the fundamental principles of equal opportunity are upheld in all decisions involving our employees and contractors/consultants, and to ensuring that the public-at-large is afforded access to our programs and services.


In accordance with Title VI of the Civil Rights Act of 1964, no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Maine Department of Transportation program or activity on the grounds of race, color, or national origin. The Maine Department of Transportation assures all its programs and activities will be free from discrimination, whether those programs or activities are federally assisted or not.

The Maine Department of Transportation conducts its Title VI/Environmental Justice Program in a team approach involving personnel from all program areas, with guidance from within the Civil Rights Office to serve as the Title VI/Environmental Justice Specialist, to ensure the Maine Department of Transportation's compliance with Title VI/Environmental Justice implementing regulations.

Inquiries concerning the Maine Department of Transportation's policies, investigations, complaints, compliance with applicable laws and regulations, and concerns regarding compliance with Title VI/Environmental Justice may be directed to:

Sherry Y. Tompkins, Director, Civil Rights Office  
Maine Department of Transportation  
16 State House Station  
Augusta, ME 04333-0016  
Telephone (207) 624-3066  
TTY 888-516-9364  
[sherry.tompkins@maine.gov](mailto:sherry.tompkins@maine.gov)

This Policy Statement must be circulated throughout the Maine Department of Transportation and be included by reference in all contracts, agreements, programs, and services administered by the Department of Transportation.

  
\_\_\_\_\_  
Bruce A. Van Note, Commissioner  
Maine Department of Transportation


Dated: 9/19/23

## FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE

The Maine Department of Transportation HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Civil Rights Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The Maine Department of Transportation will compile, maintain and submit in a timely manner Title VI information required by Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The Maine Department of Transportation will make it known to the public that those person or persons alleging discrimination on the basis of race, color or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below is authorized to sign this assurance on behalf of the grant applicant or recipient.

  
\_\_\_\_\_  
Bruce A. Van Note, Commissioner  
Maine Department of Transportation

Dated: 9/19/23

**The United States Department of Transportation (USDOT)**  
Standard Title VI / Nondiscrimination Assurances  
DOT Order No. 1050.2A

---

The *Maine Department of Transportation* (herein referred to as the "Recipient") **HEREBY AGREES THAT**, as a condition of receiving any Federal financial assistance from the U.S. Department of Transportation (USDOT) through the *Federal Transit Administration (FTA)*, is subject to and will comply with the following:

**Statutory/Regulatory Authorities**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d *et seq.*, 78 stat. 252), which prohibits discrimination based on race, color, national origin;
- 49 C.F.R. Part 21 (entitled *Non-discrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of The Civil Rights Act of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations" respectively.

**General Assurances**

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to assure 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 otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from DOT, including the FTA."*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other non-discrimination requirements (the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973) by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

**Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its federally assisted programs:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (regarding an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all

requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all ***Federal Transit Programs*** and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*“The Maine Department of Transportation, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively assure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.”*

3. **The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.**
4. The Recipient will insert the clauses of Appendix C of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix B and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
  - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or



- b. the period during which the Recipient retains ownership or possession of the property.
- 9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
- 10. The Recipient agrees that the United States has a right to seek judicial enforcement regarding any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the **Maine Department of Transportation** also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **FTA** and **USDOT** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **FTA** and **USDOT**. You must keep records, reports, and submit the material for review upon request to the **FTA** and **USDOT**, or its designee, in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The **Maine Department of Transportation** gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the **Federal Transit Program**. This ASSURANCE is binding on the State of Maine, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **Federal Transit Program**. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

**Maine Department of Transportation**

By   
**Bruce A. Van Note, Commissioner**

Dated 9/19/23

## APPENDIX A

### Performance Requirements

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, *Federal Transit Administration (FTA)*, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the *FTA* to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the *FTA*, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the *FTA* may determine to be appropriate, including, but not limited to:
  - a. withholding payments to the contractor under the contract until the contractor complies; and/or
  - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto, the contractor will take action with respect to any subcontract or procurement as the Recipient or the *FTA* may direct as a

means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

## APPENDIX B

### CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

**NOW, THEREFORE**, the U.S. Department of Transportation as authorized by law and upon the condition that the *Maine Department of Transportation* will accept title to the lands and maintain the project constructed thereon in accordance with **49 U.S. Code §5334**, the Regulations for the Administration of the *Federal Aid Transit Program*, and the policies and procedures prescribed by the *FTA* of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the *Maine Department of Transportation* all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

**TO HAVE AND TO HOLD** said lands and interests therein unto *Maine Department of Transportation* and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the *Maine Department of Transportation*, its successors and assigns.

The *Maine Department of Transportation*, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]\* (2) that the *Maine Department of Transportation* will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, US. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [i and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

## APPENDIX C

### CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the *Maine Department of Transportation* pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
  1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, *Maine Department of Transportation* will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.\*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the *Maine Department of Transportation* will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the *Maine Department of Transportation* and its assigns.\*

(\*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

## APPENDIX D

### CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the *Maine Department of Transportation* pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, the *Maine Department of Transportation* will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued. \*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the *Maine Department of Transportation* will there upon revert to and vest in and become the absolute property of the *Maine Department of Transportation* and its assigns. \*

(\*Reverter clause and related language to be used only when it is determined that such a clause IS necessary to make clear the purpose of Title VI.)

## APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

### Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 5 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 - 12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).

## Appendix II



Maine Department of Transportation

Language Assistance Plan

for Limited English Proficiency

Four Factor Analysis 2023



## **PURPOSE AND HISTORY**

In 1964, the US Department of Labor enacted legislation, Title VI of the Civil Rights Act, stating “No person in the United States shall, on the ground 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.”

“The Federal Government provides and funds an array of services that can be made accessible to otherwise eligible persons who are not proficient in the English Language. The Federal Government is committed to improving the accessibility of these services to eligible [persons with Limited English Proficiency] LEP persons, a goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English.” (US Department of Justice, 2000). In recognition of and response to language being identified as a barrier to services, the US Department of Justice (DOJ) issued [Executive Order 13166](#), “Improving Access to Services for Persons with Limited English Proficiency” on August 11, 2000, under the signature of US President Bill Clinton.

The Executive Order has two primary parts: first, it requires that federal agencies and recipients of Federal financial assistance examine the services that they provide, and develop and implement a system/plan that provides meaningful access for persons with Limited English Proficiency (LEP) to those services, benefits, information, and activities. That access extends not only to LEP applicants but also beneficiaries of the services, both US and non-US citizens, without unduly burdening the fundamental mission of the agency. Second, it directs each agency providing federal financial assistance to issue guidance to recipients to meet their obligations to provide meaningful access to services.

On the same day that President Clinton signed Executive Order 13166, the US Department of Justice (DOJ) issued a Policy Guidance Document, “Enforcement of Title VI of the Civil Rights Act of 1964 — National Origins Discrimination Against Persons with Limited English Proficiency”, to assist federal agencies in carrying out the mandates outlined in the Executive Order.

The United States Department of Transportation (US DOT) issued [Policy Guidance Concerning Recipient’s Responsibility to Limited English Proficient \(LEP\) Persons](#), modeled after the DOJ’s guidance, to the Federal Transit Administration (FTA) on how to carry out the requirements of Title VI for LEP persons. The DOT guidance outlines four factors that recipients should apply to assess the language needs of those individuals they come in contact with who have limited English proficiency, and to take reasonable steps to ensure meaningful access to their programs and activities by those people. The referenced guidance is commonly known as a four-factor analysis.

The purpose of this portion of the Maine DOT LEP Plan update is to apply the four-factor analysis to the most currently available demographic information in conjunction with survey data conducted in Maine’s eight transportation regions to determine if existing measures put in place as outlined in the 2018 plan are

sufficient to bridge gaps to services that may be caused by language barriers, and if not, to provide recommendations to do so.

The importance of the availability of language assistance should be commensurate with the number or proportion of eligible LEP persons, the frequency of contact with the service, and the importance of the program, activity, or service. That is to say, the greater the above-mentioned factors, the greater the importance to make language assistance available. Smaller recipients with limited budgets are typically not expected to provide the same level of service as larger recipients with larger budgets. The DOT's intent with this program is to find a balance that ensures meaningful access by LEP persons to critical services without imposing undue burdens on small organizations and local governments.

The four-factor analysis will help the recipients determine the right level and combination of LEP services that are both necessary and reasonable for their particular demographics. The two primary methods for providing language services are oral interpretation and written translation.

The four factors considered in the analysis are:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
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 the recipient to people's lives.
4. The resources available to the recipient, and associated costs.

### **FACTOR 1: THE NUMBER AND PROPORTION OF LEP PERSONS SERVED OR ENCOUNTERED IN THE ELIGIBLE SERVICE POPULATION**

In this part of the analysis, recipients take a look at what they have done before to serve the LEP community and determine the breadth and scope of language services that are needed to serve them. This is typically accomplished by examining demographic information attained from the US Census Bureau, the American Community Survey (ACS), schools, community partners, and local governments.

#### **Safe Harbor Stipulation**

Federal law provides a safe harbor situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A safe harbor means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided

by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary.

Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. Strong evidence of compliance with the recipient's written translation obligations under safe harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters as oral language services are needed and are reasonable.

Maine has a relatively low percentage of people who speak English less than very well. The Table 1 analysis of estimates reflected in the American Community Survey (ACS) five-year estimate for 2017 – 2021 (below), shows that statewide, there are 18,141 people over the age of 5 (or about 1.4 % of the total population of people over the age of 5) who speak English less than very well.

According to the ACS estimates for Maine, there are six languages/"Other" language categories/clusters in which the number of persons who speak English less than very well exceed the Safe Harbor Threshold of 1,000 people: French, Haitian, or Cajun, Spanish, Chinese (including Mandarin and Cantonese), Other Asian and Pacific Island languages, Other Indo-European languages, and Other and unspecified languages.

LEP persons interact with Maine DOT's subrecipients primarily via telephone, use of transit services including fare purchases, at public meetings relating to public transportation and planning, and congregate meals.

**TABLE 1 American Community Survey B16001. Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, Maine: 2021**

	Maine			
Geographic Area Name	Number of Speakers	Speak English Very Well	Speak English Less than Very Well	Percentage of the total population 5 and over
Total Population 5 and Over	1,293,114			
Speak only English	1,216,827			
French, Haitian, or Cajun	33,695	27,260	6,435	0.4976
Spanish	11,920	9,208	2,712	0.2097
Chinese (incl. Mandarin, Cantonese)	3,102	1,731	1,371	0.1060
Arabic	1,438	902	536	0.0415
Vietnamese	832	303	529	0.0409
German or other West Germanic languages	4,185	3,695	490	0.0379
Tagalog (incl. Filipino)	1,026	771	255	0.0197
Russian, Polish, or other Slavic languages	2,801	2,297	504	0.0390
Korean	643	451	192	0.0148
Other Asian and Pacific Island languages	3,026	1,876	1,150	0.0889
Other Indo-European languages	6,209	4,647	1,562	0.1208
Other and unspecified languages	7,410	5,005	2,405	0.1860
<b>Total:</b>	<b>1,293,114</b>	<b>58,146</b>	<b>18,141</b>	<b>1.4%</b>

**A Note on U.S. Census Language Coding and Tabulation:**

The coding operations used by the Census Bureau put the reported answers from the question "What is this language?" into language categories. In 2016, the code list was revised to match the International Organization for Standardization's ISO-639-3 standard, and the number of possible codes was increased from 382 to 1,333. Linguists recognize over 7,000 languages in the world, and as respondents report new languages, more codes are added to the language list.

Whenever possible, language write-ins are coded as an ISO-639-3 language. Other codes have been added for common write-ins that can only be classified within a language family (i.e. Berber languages, Karen languages), or within a geographical region (i.e. Europe N.E.C., Nigeria N.E.C.). Similarly, languages within a macrolanguage are coded at the individual language level whenever possible, and at the macrolanguage level (i.e. Chinese, Arabic, Persian) when it is not possible to determine the specific individual language from the write-in answer.

Due to small sample counts, data tabulations are not available for all 1,333 languages. Presenting data for all language codes is not sensible due to confidentiality concerns. Therefore, the Census Bureau collapses the languages into more manageable categories for tabulations. The original language categories were developed following the 1970 Census and were based generally on Classification and Index of the World's Languages (Voegelin, C.F. and F.M., 1977). In the American Community Survey, the language categories have been updated, with the latest revision occurring in 2016. In 2016, linguistic classifications were based generally on the hierarchies in Ethnologue: Languages of the World, 19th Edition (Simons, G.F. and C.D. Fennig (eds.), 2016).

The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold, but has some utility for translators or researchers. The simplest collapse recodes languages other than English into four major language groups: Spanish, Other Indo-European languages, Asian and Pacific Island languages, and Other languages. A more detailed collapsing uses 42 non-English languages and language groups.

In **Appendix IV**, we have provided the Primary Language List from the US Census which details the specific languages that could be included in the three “Other” language groups/clusters identified by the U.S. Census for the State of Maine. The Primary Language List from the U.S. Census can also be accessed at this link: [primary\\_language\\_list.pdf \(census.gov\)](#).

To accommodate LEP citizens who fall into the “Other” language categories, MaineDOT will translate vital documents in the specific language only upon request. Also, MaineDOT has engaged Acutrans, a licensed and certified language translation company, to identify the top 10 languages spoken in Maine (other than English) in order to have certified translators at public meetings who can accommodate these LEP speakers. These languages include:

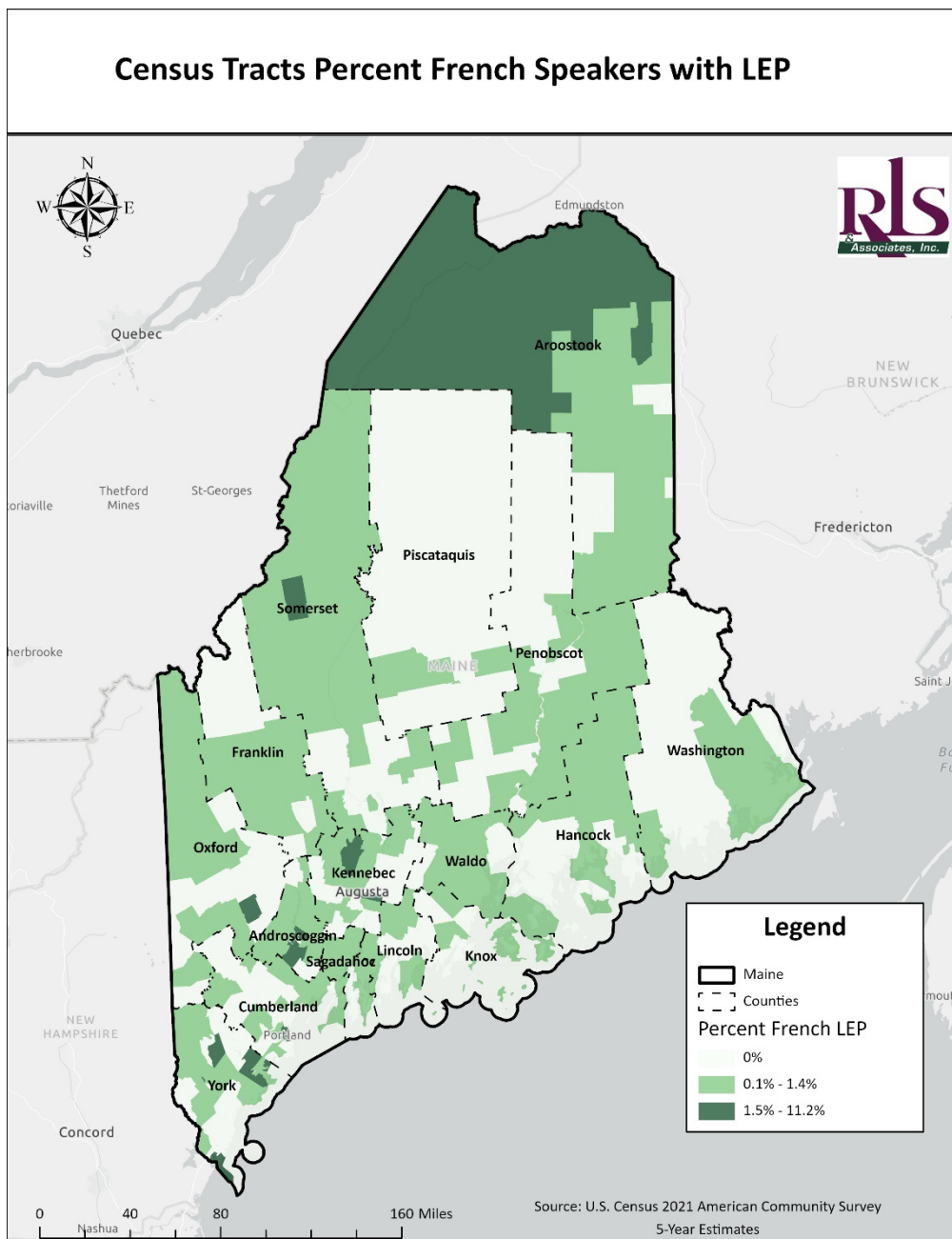
<b>Top 10 Languages of Maine (Other Than English)</b>
French
Spanish
Chinese
German
Amharic, Somali, or Other Afro-Asiatic Languages
Swahili or Other Languages of Central, Eastern, & Southern Africa
Portuguese
Arabic
Tagalog
Other Native Languages of North America

Source: <https://acutrans.com/top-10-languages-of-maine/>

## French

Per the ACS estimates, there are 6,435 French-speaking LEP persons in Maine, the greatest concentration of which are located (in ascending order) as follows: Region 7 - Androscoggin County (1,015 persons), Region 8 - York County (1,171 persons) Region 1 - Aroostook County (1,326 persons), and Region 6 - Cumberland County (1,363 persons). The available estimates indicate that French-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities, although there are populations of French-speaking LEP persons around Portland, Lewiston/Augusta, and in the St. John Valley of Aroostook County. (Figure 1)

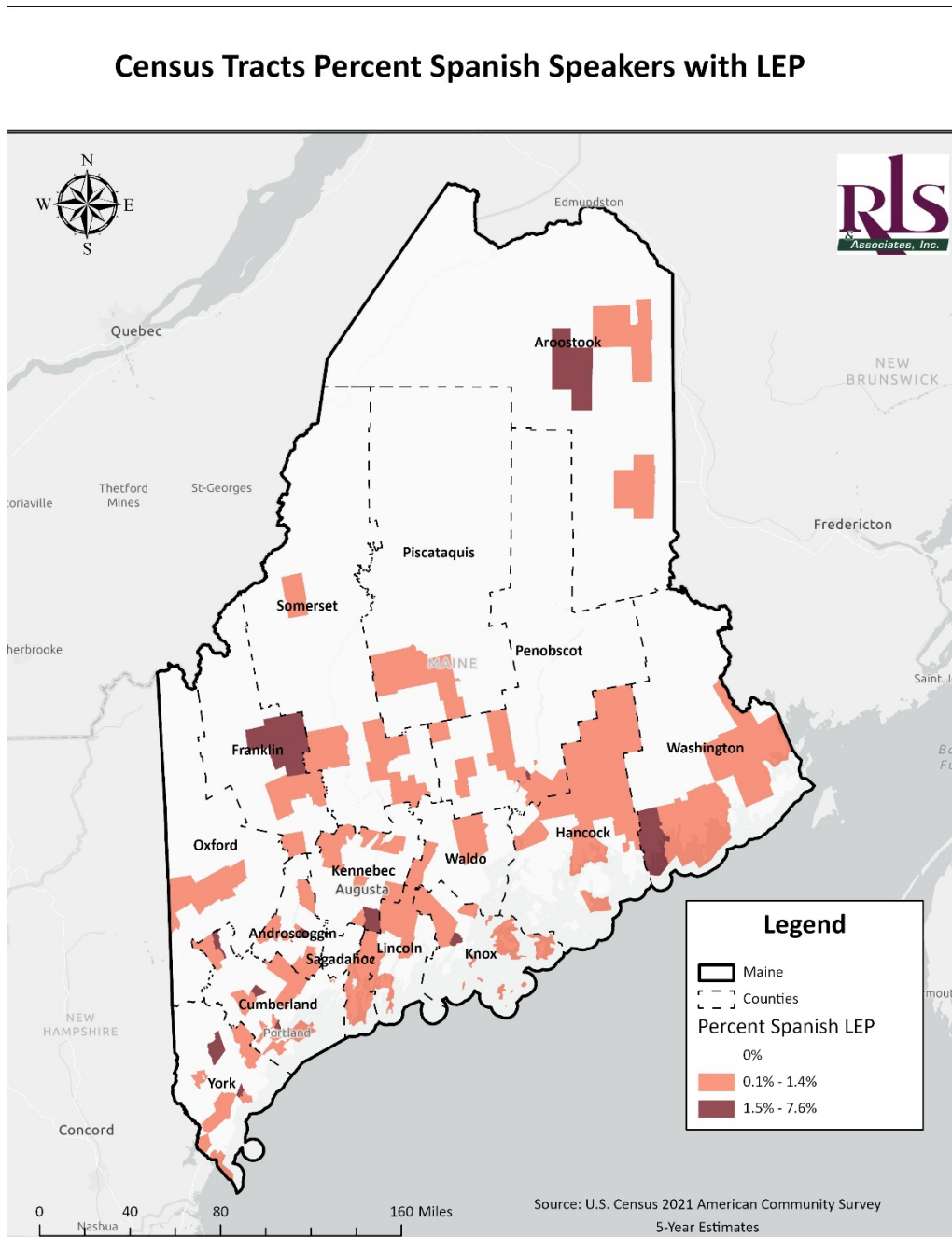
**FIGURE 1.**



## Spanish or Spanish Creole

ACS estimates indicate that there are 2,712 Spanish or Spanish Creole LEP persons in Maine, the greatest concentrations of which are located (in ascending order) as follows: Region 4 - Kennebec County (250 persons), Region 3 - Penobscot County (315 persons), Region 8 - York County (316 persons), and Region 6 - Cumberland County (791 persons). The available data would indicate that Spanish-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities, although the Cumberland County numbers would suggest that there are likely a substantial number in the City of Portland. (Figure 2). In addition, there is a Spanish-speaking community in Washington County.

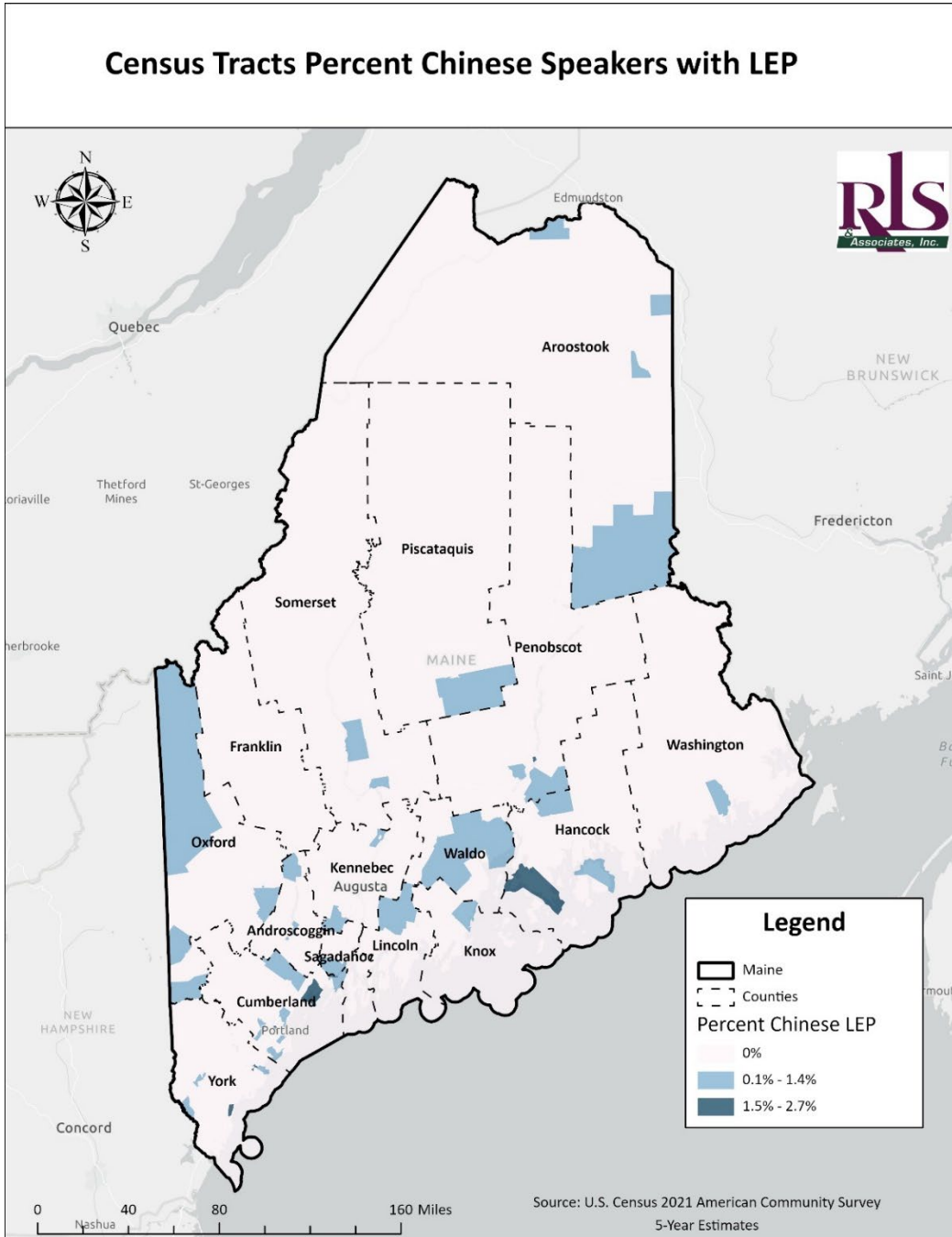
**FIGURE 2.**



# Chinese

Per the ACS estimates there are 1,371 Chinese LEP persons in Maine, the greatest concentrations of which are located (in ascending order) as follows: Region 3 - Penobscot County (135 persons), Region 4 - Kennebec County (139 persons), Region 8 – York County (196 persons), and Region 6 - Cumberland County (427 persons). ACS estimates show that Chinese-speaking LEP persons are dispersed throughout Maine, rather than in concentrated communities. However, there are large areas throughout the state with no Chinese speakers. (Figure 3)

**FIGURE 3.**





MaineDOT monitors new data to ensure that, if thresholds are exceeded in non-English language populations, processes will be put into place to address any language discrimination that may exist. Given the increase in the LEP populations discussed above, MaineDOT will need to ensure, at a minimum, provision of appropriate translation efforts, particularly in terms of public outreach and the provision of vital documents that are available in languages spoken by the six language groups. MaineDOT's 2023 Four Factor Analysis and information on translation and diversity services by county can be found on our website at: <https://www.maine.gov/mdot/civilrights/title-vi/>.

Largely and consistently, identifying LEP populations in Maine's public transit service areas is accomplished through census data, communication with friends and family members who work with LEP populations, communication with community organizations (e.g. Healthy Androscoggin), professional and medical services, schools, churches, neighborhood gathering spaces, the Maine departments of Transportation, Education, Health and Human Services, and through LogistiCare, a private, for profit manager of non-emergency medical transportation. Penquis, a community action agency serving Penobscot, Piscataquis and Knox counties, also conducts many transportation presentations throughout the year to reach out to all who are interested in transportation.

## **FACTOR 2: THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH MAINE DOT PROGRAMS, ACTIVITIES, AND SERVICES**

Given that MaineDOT is a large organization that does not directly operate transit services, it is difficult to gauge precisely how much contact LEP persons have with MaineDOT services and programs. In order to obtain a clearer picture of the frequency and manner in which LEP persons engage with MaineDOT, we have taken and will take the following steps:

- MaineDOT surveyed subrecipients in 2020 to quantify the frequency of LEP interactions and to determine if there are any specific subrecipients or subrecipient regions that have a higher frequency of LEP interactions.
- MaineDOT plans to implement the aforementioned survey every three years.
- MaineDOT plans to implement the following process to assist with development of its Language Assistance Plan annually.
  - MaineDOT will appoint an individual to regularly handle data collection for its Language Assistance Plan moving forward.
  - The individual will identify all the touchpoints where MaineDOT interacts with the public (public meetings, customer service interactions, online resources, written communications, through subrecipients, etc)
  - MaineDOT will then implement a system to track and record instances where LEP individuals interact with MaineDOT or with its subrecipients. This will involve administering the aforementioned survey, tracking responses in a database, and may necessitate the purchase of specialized software.
  - MaineDOT will track the type of interaction (public meeting attendance, website visits, etc), the language used, and any language assistance provided or requested.

- MaineDOT will encourage feedback proactively from LEP individuals who interact with MaineDOT or its subrecipients. This will be through written surveys, feedback forms at public meetings, and online channels.
- MaineDOT will collect information on their experience with language barriers and the effectiveness of any language assistance provided to them.
- MaineDOT will regularly review and analyze the data collected to identify trends and patterns. This will be done triennially.
- MaineDOT will identify which touchpoints have the highest frequency or LEP interactions and which languages are most commonly needed.
- MaineDOT will, based on the analysis, make adjustments to its language assistance strategies as needed. For any touchpoints with high LEP interaction, MaineDOT will provide translated materials and interpretation services.
- MaineDOT will continuously refine its language assistance efforts based on feedback and changing demographics in the state of Maine.
- MaineDOT will collaborate with local community organizations that serve LEP populations so that they can provide insight into specific needs and help disseminate translated materials.
- MaineDOT will provide training to its own staff to appropriately respond to LEP interactions, and will ensure that its staff are aware of all available language assistance resources. MaineDOT will then provide this training to its subrecipients.

### **Summary of MaineDOT Survey of Subrecipients for Factor 2:**

In 2020, MaineDOT undertook a survey to determine the frequency with which LEP individuals come into contact with the programs, activities and services provided by the Maine transportation regions, we surveyed the staff and drivers from each agency and a sampled transportation providers' community partners.

A 12-question survey was distributed to the service providers staff and drivers.<sup>1</sup> We received 156 survey responses with representation from all eight transportation regions, including responses from a comprehensive cross section of personnel — executive directors, general managers, operations directors, street supervisors, drivers (medical transportation, fixed route, volunteer, van, bus, trolley, and ferry boat captains), dispatchers, schedulers, mobility managers, transportation supervisors, customer service representatives, greeters, and intake specialists.

Some respondents did not respond to all of the questions. A four-question survey was distributed to community partners such as local governments, shelter programs, community centers, and the United Way.

Below is a summary of the results by region. MaineDOT plans to implement this survey process every three years.

## **Region 1**

Aroostook Regional Transportation Systems, Inc (ARTS) provides demand-response transportation services in Aroostook County, the largest American county by land area east of the Mississippi River with a population density of 11 people per square mile, including 1,799 French-speaking LEP persons. ARTS had a single survey respondent who was not a driver, who indicated that they come into contact with approximately 1–10 LEP individuals in the average week through telephone, email and fax communications. As the respondent is not a driver, no conclusion can be made with regard to the location of the highest LEP ridership in Aroostook County.

---

<sup>1</sup> Two versions of this survey were distributed. In one version, question number six, “How often do you come into contact with riders who speak English less than very well, not well, or not at all?” had multiple choice responses listed in groups of ten from 1–10 up to 91–100 LEP persons per week. In the other version, question six had multiple choice responses listed as, “Often”, “Sometimes”, “Rarely”, and “Never”. Through discussions with a sampling of respondents we were able to equate “often, sometimes, rarely, or never” with the numbered groups.

## **Region 2**

### **Zero:**

Isle au Haut Boat Services and Downeast Transportation Inc. had a total of ten respondents, seven of whom indicated that they come in contact with no LEP individuals. This is consistent with information obtained from community partner outreach.

### **1–10:**

Two respondents indicated that they typically see 1–10 Spanish speaking LEP riders per week, in Bar Harbor on the Ellsworth to Bar Harbor route.

### **11–20:**

DCP also had a driver of the Ellsworth, Bar Harbor and Bangor routes who comes in contact with LEP populations 11–20 times per week who speak French, Spanish, German, Vietnamese, Chinese, Russian, Polish, Korean, Japanese, and Italian.

## **Region 3**

### **Zero:**

Penquis Transportation Services had 16 respondents, eight of whom indicated that they never or come into contact with LEP persons.

Two of those eight were office staff, so could not speak to locations of highest ridership of LEP persons, and they did not respond to the question of frequency of contact. However, one did indicate that the language most commonly encountered is French.

### **1–10:**

Seven respondents, including drivers, customer service representatives and phone intake representatives, came in contact with 1–10 LEP persons per week, mostly on the Penobscot and Bangor routes, typically speaking African languages, German, Chinese, and Korean.

## **21–30:**

One Penquis driver who drives the Dover-Foxcroft, Milo and Bangor routes responded that they come into contact with approximately 21–30 riders who speak English less than very well, not well, or not at all. However, when responding to the question of which route(s) has/have the highest LEP ridership, they answered ‘none’. This can be interpreted to mean that LEP persons ride all routes equally, or that they misunderstood the question. The most common language that they encountered was listed as “other; English”.

## **Region 4**

KVCAP had 53 respondents, broken down as follows.

### **Zero:**

Eleven drivers and an office staff person indicated that they never come in contact with LEP populations on the Skowhegan, Waterville, Augusta, and Bangor routes, or in any parts of Region 4.

### **Undetermined:**

Nine respondents including mostly office staff and two drivers reported coming into contact with an undetermined number of LEP persons, primarily in on the phone and in person, who speak Vietnamese, Hindi and Middle Eastern languages.

### **1–10:**

Twenty-two respondents including seven office staff and 15 drivers serving Waterville, Augusta, Skowhegan, Fairfield, Winslow, Anson, Madison, Norridgewock, Oakland, Vassalboro, Winthrop, Monmouth, Kennebec and Sidney indicated that they come into contact with approximately 1–10 LEP persons in the average week, speaking French, Spanish, African languages, German, Vietnamese, Portuguese, Chinese, Tagalog, Thai, Italian, and Arabic languages, with the Waterville route identified as having the highest LEP ridership.

### **11–20:**

Ten KVCAP respondents including two office staff and eight drivers serving Augusta, Waterville, Oakland, Fairfield, Gardiner, Winthrop, Skowhegan, Randolph, and Sidney, reported that they come into contact with 11–20 LEP persons in the average week, typically in person and on the phone, speaking Spanish, African languages, German, Vietnamese, Polish, Hindi, Somali, Irish, Arabic and ASL (sign language), with the Augusta route identified as having the highest LEP ridership.

## **21–30:**

One KVCAP driver who drives the Skowhegan, Waterville, Madison, Solon, and Bingham routes responded that they come into contact with approximately 21–30 riders who speak English less than very well, not well, or not at all. However, when responding to the question of which route(s) have the highest LEP ridership, they answered ‘none’. This can be interpreted to mean that LEP persons ride all routes equally, or that they misunderstood the question. The most common language that they encountered was listed as “other; English”.

### **Region 5**

Waldo County Community Action Program (WCAP) had 27 respondents broken down into two frequency categories.

#### **Never, Very Limited, or 3–4 Times Per Year:**

Thirteen respondents including one office staff and 12 drivers serving Bangor, Portland, Augusta, Waldo, Penobscot, Knox, Troy, Unity, Rockland, Belfast, Searsport, and Morrill areas come into contact with LEP persons either never, very limited, or 3–4 times per year, in person, on the phone, or via email, speaking French, Spanish, German, Tagalog, and Italian.

#### **1–10:**

Thirteen respondents including three office staff and 10 drivers serving Augusta, Brunswick, Rockland, Camden, Bath, Belfast, Waldo, Belmont, Searsmont, the counties of Kennebec, Lincoln and Sagadahoc, coastal, inland, and Portland to Bangor comes into contact with approximately 1–10 LEP persons in the average week speaking French, Spanish, African languages, Chinese, Hindi, and Arabic, with the Belfast route being identified as having the highest LEP ridership.

### **Region 6**

#### **Zero:**

Region 6 had 28 respondents including two office staff with no frequency of contact provided, one office staff with fewer than 1 per week, and one driver with a response of 3–4 but no timespan to categorize it (e.g. per week or per year).

**1–10:**

Eight drivers responded, serving Biddeford, Saco, Old Orchard Beach, Greater Portland and Cumberland County comes into contact with approximately 1–10 LEP persons per week either in person, on the phone, via email, or at events, speaking French, Spanish, African Languages, German, Vietnamese, Chinese, Russian, and Hindi, with Old Orchard Beach and Portland routes being identified as having the highest LEP ridership.

**11–20:**

Twelve respondents including two office staff and 10 drivers serving Biddeford, Saco, Old Orchard Beach, and Portland came into contact with approximately 11–21 LEP persons in an average week, speaking French, Spanish, African Languages, Vietnamese, Portuguese, Chinese, Russian, Polish, and Japanese. Biddeford, Saco, Old Orchard Beach, Portland, and Westbrook routes were identified as having the highest LEP ridership.

**21–30:**

One supervisor and one driver serving Portland, South Portland, Westbrook, Scarborough, Falmouth, Windham, Raymond, Casco, Naples and Bridgeton responded that they come into contact with approximately 21–30 riders who speak English less than very well, not well, or not at all via telephone, email, fax, a language line, and in person. No one route was identified as having the highest LEP ridership.

**31–40:**

One RTP office staff, a dispatcher, indicated that they come in contact with 31–40 LEP individuals in an average week either by telephone or in person, who are riding to Lewiston and Auburn. The languages encountered are French, Vietnamese, Russian, Samoan, and Farsi. No route was identified as having the highest LEP ridership.

**41–50:**

One RTP driver, indicated that they come in contact with 41–50 LEP individuals in an average week in person, traveling to the greater Portland area, speaking Vietnamese and Chinese. The Portland route was identified as having the highest LEP ridership.

**Region 7**

**Zero:**

Region 7's Western Maine Transportation (WMTS) had 20 respondents including one office staff and one driver with no frequency of contact provided, and one driver serving Oxford, Norway, West Paris, South Paris and Rumford who indicated that they encountered no LEP persons in the average week, and provided no additional responses to the survey.

**1–10:**

One office staff and 11 drivers serving Lewiston, Auburn, Androscoggin, Farmington, Wilton, and Jay responded that they come into contact with approximately 1–10 LEP persons per week either in person (all), on the phone (one), speaking French, Spanish, African Languages, Vietnamese, Portuguese, Chinese, Russian, Thai, Korean, and Hindi. The routes identified as having the highest LEP ridership are College Street, Lisbon Street, Sabattus Street, Shuttles, and Auburn and Lewiston.

**11–20:**

Two office staff and two drivers serving Lewiston, Auburn, Farmington, and Sugarloaf responded that they come into contact with approximately 11–20 LEP persons per week either in person or on the phone speaking French, African Languages, and Somali. The City Link and College Street routes were identified as having the highest LEP ridership.

**31–40:**

One driver serving Lewiston and Auburn responded that they come into contact with approximately 31–40 LEP persons per week in person speaking French and Somali. The College Street and Lisbon Street routes were identified as having the highest LEP ridership.

**Region 8**

**Zero:**

Region 8's York County Community Action Corporation (YCCAC), had 16 respondents including one office staff who reported fewer than three encounters per week with LEP persons, typically on the telephone, speaking French and Tagalog.

**1–10:**



Four drivers serving Biddeford, Saco, Old Orchard Beach, and Portland responded that they come into contact with approximately 1–10 LEP persons per week in person, speaking French, Spanish, African Languages, Portuguese, Russian, and Hindi. The Trolley routes, Old Orchard Beach, and Portland routes were identified as having the highest LEP ridership.

### **11–20:**

Two office staff and eight drivers serving Biddeford, Saco, Old Orchard Beach, and Portland, responded that they come into contact with approximately 11–20 LEP persons per week either in person or on the phone speaking French, African Languages, and Somali. The Biddeford, Old Orchard Beach, Saco and Portland routes were identified as having the highest LEP ridership.

Also of note is that in the summer months, primarily due to tourism, all routes were identified as having the highest LEP ridership.

In summary,

- Approximately 9% of respondents did not indicate how many LEP persons they encountered in the average week.
- Approximately 26% of respondents came into contact with LEP persons never, very limited, or 3–4 times per year.
- Approximately 41% of respondents came into contact with 1–10 LEP persons in the average week.
- Approximately 18% of respondents came into contact with 11–20 LEP persons in the average week.
- Approximately 3% of respondents came into contact with LEP persons 21–30 times in the average week.
- Approximately 1% of respondents came into contact with LEP persons 31–40 times in the average week.
- Less than 1% of respondents came in contact with 41–50 LEP persons in the average week.

Approximately 94% of Maine’s transportation regions’ providers come into contact with 20 or fewer LEP persons in the average week.

Survey question five asked which routes in your service area have high LEP ridership. As that is a relative question and was open ended, the answers were not as conclusive as we would have hoped. Some respondents named destinations while others named routes. It can be concluded that the routes with the highest LEP ridership in the State of Maine are those in Region 6 in the greater Portland area, and in Region 7 in Lewiston and Auburn. However, each transportation region has its own routes of importance/high ridership given their relative total and LEP populations.

Region 1 did not provide adequate data to make a determination. The Ellsworth, Bar Harbor and Bangor routes in Region 2 have the highest ridership by LEP persons. In Region 3 it is the Bangor routes; in Region 4 it is Waterville, Augusta, Skowhegan, Madison, Winthrop and Gardiner; in Region 5 Portland, Bangor, Waldo and Augusta; in Region 6 it is Biddeford, Saco, Old Orchard Beach, Portland, Lewiston, and Auburn; in Region 7 it is Lewiston, Auburn, and Farmington, and lastly; in Region 8 it is Biddeford, Saco, Old Orchard Beach, and Portland.

## **FACTOR 3: THE IMPORTANCE TO LEP PERSONS OF YOUR PROGRAM, ACTIVITIES AND SERVICES**

### **Region 1**

Aroostook County is home to 25% of the French speaking LEP population, which is one thousandth of Maine's total population. The Trip Controller who responded to the survey indicated that the questions most commonly asked are about how to ride the bus, where the bus is, fares, hours and days of service, accessibility, and complaints. Mostly, the trip destinations are to medical offices and hospitals, pharmacies, other shopping, and home.

### **Region 2**

The LEP populations coming into contact with Downeast Community Partners' services are typically asking questions about days and hours of service, where's my bus, accessibility and complaints, riding to medical appointments, pharmacies, grocery stores, other shopping, schools, and home.

### **Region 3**

Penquis Transportation Services indicated that when they interact with LEP riders, the most asked questions are about fares, how to ride the bus, hours and days of service, accessibility, and complaints. Their destinations are typically to medical offices and hospitals, pharmacies, grocery stores and home.

### **Region 4**

KVCAP survey respondents indicated that when they interact with LEP riders the most common questions that they hear are about origin and destination, how to ride, bus location, fares, hours and days of service, accessibility, and complaints. Primary destinations are to medical offices and hospitals, pharmacies, grocery stores, other shopping, entertainment/social trips, employment, schools, and home.

### **Region 5**

WCAP survey respondents indicated that their most common communications with LEP persons are about how to ride the bus, fares, hours and days of operation, accessibility, and complaints. The most common destinations are medical offices and hospitals, grocery stores, other shopping, and home.

### **Region 6**

RTP personnel indicated that when they interact with LEP populations the primary questions they are asked are how to ride the bus, origin and destination, where is my bus, fare questions hours and days of service, accessibility, and complaints. The most typical destinations are to medical offices/hospitals, pharmacies,

grocery stores, other shopping, employment, entertainment/social engagements, schools, entertainment/social events, and home.

### **Region 7**

WMTS survey respondents indicated that when they interact with LEP populations, the primary questions they are asked are of origin and destination, where is my bus, fare questions, hours and days of service, accessibility, and complaints. The most typical destinations are to medical offices and hospitals, pharmacies, grocery stores, other shopping, employment, entertainment/social events, schools and home.

### **Region 8**

YCCAC survey respondents indicated that when they interact with LEP populations, the primary questions they are asked are of origin and destination, how to ride, where is my bus, fare questions, and hours and days of service. The most typical destinations are to medical offices/hospitals, pharmacies, grocery stores, other shopping, employment, entertainment/social events, home, and the courthouse.

Overall, the most commonly accessed services by LEP individuals riding public transportation in Maine appear to be medical offices and hospitals, grocery shopping, pharmacies, schools, employment and other shopping, and entertainment.

Information provided by community partners in all eight transportation regions, such as local governments, the United Way, community shelter programs, youth centers, and health centers indicates that they minimally or occasionally encounter LEP persons.

## **FACTOR 4: THE RESOURCES AVAILABLE TO THE RECIPIENT AND COSTS**

**Region 1** transportation service providers indicated that they are moderately effective in communicating with LEP individuals. ARTS rides are scheduled by calling the office. Customer service staff are prepared to respond with language assistance as needed and identified. ARTS reaches out to the Maine departments of Transportation, Education, Health and Human Service, to LogistiCare, community organizations, professional and medical services, and schools for referral of ARTS services. LEP individuals are identified by referral source and/or Customer Service staff when a ride is scheduled, and 'I Speak' language identification cards, translated signage, use of translators, and mobile device translation services are all available for LEP individuals using ARTS services.

**Region 2** transportation service providers indicated that they are moderately effective in communicating with LEP persons on the rare occasion that they come into contact with them. The drivers keep 'I Speak' cards with information about telephone translation services on every vehicle in case they are needed, and they also have use of mobile apps like Google Translate that they find to be very effective.

**Region 3's** Penquis Transportation Services indicated that they can communicate moderately to very effectively with LEP individuals that they come into contact with. They use 'I Speak' cards and also have a language charts to identify LEP languages. When needed, they have access to a translation service, but they have never needed to use it. The Senator's office in Bangor very rarely comes into contact with LEP individuals, but indicated that if they did, they would work through their DC office to find a translator.

With regard to the ability to communicate with LEP individuals, of the 53 survey respondents from KVCAP in **Region 4** two indicated that they are unable to communicate, five indicated that they are less effective in communicating, 14 indicated that they are moderately effective in communicating, and six indicated that they are very effective in communicating. They have 'I Speak' cards available if needed, use Certified Language International services if needed, and keep language material in a number of languages available on all of their vehicles for referring to a toll-free translation service. Community Partner, United Way indicated that they never encounter LEP individuals and have never found language to be a barrier to their services. The Harold Alford Center and the Alford Youth & Community Center indicated that they very rarely encounter non-English speaking/reading individuals, however, in the event that they do, they utilize a portable translator, which calls a translation business with many languages to choose from and the transmits on-screen translations of whatever is being spoken. They also may use the same translation service via the phone, and lastly, they have multi- or bilingual staff to draw upon.

**Region 5's** WCAP indicated that their employees can communicate moderately to very effectively with LEP individuals, and that they use translation cards with rudimentary bus-related terms on them for communication assistance. They also indicated that the local organization New Mainers Resource Center has translators available to anyone who needs them.

Largely, the survey respondents from the **Region 6** public transportation providers indicated that they communicate moderately to very effectively, with a single driver indicating that they communicate less effectively. Region 6 did not provide information regarding available communication methods or translation services.

**Region 7's** WMT survey respondents indicated that they are moderately to very effective at communicating with LEP individuals. Staff at WMT have family members who are educators who notify them of new LEP populations in the school systems. Additionally, they have contacts at most of the regional medical providers who also inform them of LEP individuals new to the area. Like Region 5, they reach out to New Mainers Resource Center through Healthy Androscoggin. The Town of Brunswick has personnel assigned to assist the new LEP individuals who have resettled in that community, and they are partnering with WMT on a Transit Study for that area. A local employer has provided a person to assist with New Mainers using the bus service for job access to his business. WMT has always provided 'I Speak' cards for the drivers to use. They are fortunate to have a driver from the Congo who speaks some of the Congolese dialects and assists with translations as needed. They indicated that he has been so helpful that they wish that they could clone him! WMT is in the process of updating their website to include national flag icons to click for translations to French, Spanish, Swahili, and Somali.

**Region 8's** YCCAC's survey respondents indicated that they are moderately effective to very effective at communicating with LEP individuals. YCCAC has partnerships with several organizations for outreach purposes in Biddeford, Sanford, Old Orchard Beach and Saco, the cities and towns with the largest concentration of speakers of French, Haitian or Cajun and who identify as speaking English less than very well. These include the school departments, city administrative offices, Biddeford, Saco, Old Orchard Beach Transit, Chambers of Commerce and the Southern Maine Planning & Development Commission. The YCCAC Transportation Program has 'I Speak' cards available on its vehicles and at public meetings and can also call upon translation services if the need arises via a contract with Pacific Interpreters/Language Line Solutions for three-way telephone interpreter services. Additionally, family members, social service groups, family-based organizations and medical providers may provide translator services when appropriate. Translation services identified in Maine DOT's FTA Title VI plan are also an option when appropriate. YCCAC has several resources available to translate documents, including House of Languages.

When Nason Health Care communicates with LEP individuals, they locate interpreter/translation services such as Language Line or 711 Relay services. They note that those services have worked very well for them in the past.

York County Shelter Programs occasionally encounter LEP individuals, most commonly at the food pantry and/or meal site kitchens. They utilize mobile apps and telephone translation services as needed, and re-evaluate the tools and resources that they utilize in order to ensure that they can provide uninterrupted and quality services to LEP persons.

### **CONCLUSION**

It appears that with a few exceptions, language is not a barrier to services in Maine, and that there are resources available to provide meaningful access to programs and activities if they are needed, including community organizations like Healthy Androscoggin and New Mainers Resource Center; translation services like Pacific Translators Language Line and Catholic Charities Interpreters; mobile apps; 'I Speak' cards; bilingual and multilingual staff; and 711 relay services. Survey respondents indicated that translation methods like mobile apps, 'I Speak' cards, and tele-language services would be most helpful in bridging the communication gaps as they arise.

### **RECOMMENDATIONS**

The few exceptions referenced above include ARTS in Region 1. There was inadequate information obtained from Region 1 during this process to provide a clear picture of the need or services available to address the needs of LEP individuals in Region 1. It is recommended that MaineDOT reach out to ARTS to gain perspective on the needs and resources in Region 1.

Also, there are KVCAP drivers in Region 4 who indicated that they either cannot communicate with LEP individuals or communicate less effectively. It is recommended that KVCAP provide some training for those employees, as well as provide information to them about available translation/interpretation services.

It is unclear if RTP in Region 6 has any methods of communicating with or translating for LEP individuals in their service area. It is recommended that Maine DOT reach out to Region 6 to address this issue.

Overall, the translation resources appear to be commensurate with the number or proportion of eligible LEP persons, the frequency of contact with the services, and the importance of the program, activity, or service. Notably, those surveyed about addressing language barriers did not specifically mention written translation of vital documents. The Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold of 1,000 or 5% of the LEP population, whichever is less, the subrecipient must provide written translation of vital documents for the non-English users (e.g. the Title VI/ADA policy statement and/or Notice to the Public, complaint forms, and ADA paratransit eligibility forms). Maine DOT should follow up with its subrecipients to ensure that this practice has been implemented.

#### **REFERENCES**

Maine Department of Education. (2019–2020). *English Learner Data Dashboard*. Retrieved from Maine Department of Education: <https://www.maine.gov/doe/englishlearnerdatadashboard>

US Census Bureau. (2010). *Maine Vietnamese Population Percentage City Rank*. Retrieved from USA.com: <http://www.usa.com/rank/maine-state--vietnamese-population-percentage--city-rank.htm>

US Department of Justice. (2000, August 16). <https://www.govinfo.gov>. Retrieved from <https://www.govinfo.gov/content/pkg/FR-2000-08-16/pdf/00-20938.pdf>

**FTA Compliance Subrecipient Self-Certification Checklist**

## Instructions:

1. Type as many notes as necessary to fully explain the answer to each question in each section. Each section is numbered.
2. When referencing a policy that is part of a larger document, include the page # where it appears.

Subrecipient Name and Address: [Western Maine Transportation Services, Inc \(WMTS\)](#)Subrecipient Contract, with title: [Sandy Buchanan, Executive Director](#)

Types of Funds Received: 5311 Op, Admin, Capital, 5310 – PM, EADA, Mob Mgmt, Capital, 5339, CMAQ, RTAP

Type of Service Provided: D/R including complimentary ADA, fixed route, flex route seasonal, and commuter

Date: April 12, 2023

**Comments:** [Click or tap here to enter text.](#)

**I certify that the foregoing signature is true and accurate. I further certify that it (a) is intended to have the same force as a manual signature, (b) is unique to myself, (c) is capable of verification, (d) is under the sole control of myself, (e) is linked to data in such a manner that it is invalidated if the data are changed. (10 M.R.S.A. §9501 et seq.)**

Authorized Representative: Sandy Buchanan  
Transit Agency: Western Maine Transportation Services, Inc (WMTS)  
Title: Executive Director  
Date: 04/13/2023

***Check for electronic signature of an authorized representative who certifies the foregoing to be true and accurate.***



MaineDOT will review every subrecipient on-site at least every five years and require each subrecipient to self-certify annually that all compliance areas are being met. Additional site visit reviews will be conducted as determined by MaineDOT staff.

Below is a list of critical documents/policies that each subrecipient is required to have. MaineDOT will keep these documents on file and require that the subrecipient send updated documents when they are revised.

<b>Required Documents/Policy List:</b>	<b>Submitted to MaineDOT</b>	<b>Date of document</b>
ADA policy	Submitted 03/2022	09/21/2021
Approved Indirect Cost Rate	Yes	08/10/2021##
Asset Management Plans (facilities/equipment/rolling stock)	03/15/2022	03/15/2022
Complaint Resolution Officer Policy (Ferry Service only)	NA	NA
Contracts/Subcontracts not already on file at MaineDOT	NA	NA
Cost Allocation Plan	03/2022	10/2021##
Customer Complaint Policy/Form	Included	06/19/2014
Drug and Alcohol Policy	Included	*03/30/2023*
EEO Policy	Included	03/20/2023##
Ethics/Conflict of Interest Policy	In Personnel Policy Pg. 15 attached	Last update was 12/14/2022
Financial/Accounting Policies and Procedures	Submitted previously	12/15/2021
In-Kind Valuation Policy	Submitted previously	2014
Marketing/Promotional Materials	Any updates since last self-certification	03/2022-03/2023
Procurement/Purchasing Policy	Submitted previously	2010
Signed Certifications and Assurances	Yes	03/17/2023
Title VI Plan/Complaint Process	Included	03/17/2023##
Volunteer Driver Policy	NA	NA
* Changes to non-policy items only (i.e. Names, titles, etc.)		

## In the process of updating attached with changes will forward when approved by BOD or when received for the approved Indirect Cost Rate and Cost allocation Plan.

**1. Legal**

- a. Has any employee committed a criminal or civil violation of law pertaining to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving federal assistance?  
No
- b. Does your agency conduct lobbying activities or pay for lobbying activities? No
  - If lobbying was done, confirm that no federal funds were used and provide source. NA
  - If lobbying was done, confirm that OMB Standard Form LLL was filed with FTA and copy provided to MaineDOT. NA
  - Do you ensure that bidders on contracts over \$100,000 file the required lobbying certification? Yes

**2. Financial Management and Capacity**

- a. Are FTA grant funds used for their intended purpose as outlined in each Assignment Letter received from MaineDOT? Yes
- b. Did your organization spend \$750,000 or more in federal funds during your last fiscal year? If yes, are you current with single audit requirements? Yes, Yes
  - Were audit findings reported and resolved? No findings were found
- c. Is your organization subject to the Maine Uniform Accounting and Auditing Practices for Community Agencies (MAAP) as enacted by Title 5 Chapter 148-B? If yes, have your completed and submitted your MAAP Audit as required? Yes
  - Were audit findings resolved? No Findings
- d. Describe your accounting system and financial management controls and explain how the following requirements are met:
  - Financial reporting
  - Accounting records
  - Internal controls
  - Budget controls
  - Allowable costs
  - Source documentation
  - Cash management
  - Adequate staffing/qualificationsPlease refer to Admin Manual enclosed.
- e. Have your financial policies been updated to reflect the newest regulations? Not since the last time the policy was submitted. Has MaineDOT been provided the most recent update? Will review, update, present to Board and submit if necessary
- f. Do you charge indirect costs to federal grants? If yes: Yes
  - Who is your cognizant agency? Indirect cost allocation is reviewed and approved by Maine Department of Transportation Office of Audit.
  - Is the approved rate on file at MaineDOT? Yes 28.07%

- How do you ensure that the correct rate is being charged on monthly invoices to MaineDOT? All calculations and rates are double checked before submitting invoices to MaineDOT.
- g. What are the sources of local share? Discuss sources and tracking. Municipalities and/or counties we serve, social service agencies and other State of Maine Agencies – DHHS, CDS, DOE, Voc. Rehab, Fedcap, grants from other organizations including United Ways, Maine Community Grant Foundation, Sewall Foundation, and private/public partnerships. WMTS keeps detailed records of project related expenditures, including required local share funds usage.
- h. Can the costs charged to a specific project be traced back from the general ledger to the actual invoices? Yes Provide proof to MaineDOT. attached  
*Click or tap here to enter text.*
- i. Are employee travel expenses charged to FTA grants/contracts? Yes If yes, were costs incurred following state per diem rates? Explain how costs were deemed eligible and how they were submitted for reimbursement. WMTS requests receipts and and follow procedures outlined in the Admin Manual.
- j. Do you use volunteer drivers? If yes, does MaineDOT have a copy of your volunteer driver policy? **Not at the present time** Not at the present time
  - Do you use volunteer miles or hours as in-kind match on federal contracts? If yes, has the in-kind method been approved by FTA Region 1? Provide copy.  
N/A at this time

### **3. Technical Capacity – Award Management**

- a. Does your organization invoice MaineDOT monthly as required in the Cooperative Agreement and Assignment Letter for each project? **Yes**
- b. Do you keep the MaineDOT project manager updated on changes to active projects including sharing challenges and successes? **Yes**
- c. If you have multiple open contracts utilizing FTA funds, do you ensure that you are spending down the oldest funds first? How? **Identifying oldest contracts and verifying with MaineDOT so that older contracts are used first unless directed otherwise.**

### **4. Technical Capacity – Program Management**

- a. Do you have any contracts over \$150,000? If yes, do the contracts address administrative, contractual, and legal remedies for when the contractor violates contract terms? **Yes**
  - Does the contract provide sanctions and/or penalties as appropriate? **Yes**
  - Does the contract contain the provisions of the Clean Water Act? **Yes**
  - Does the contract contain the Federal Water Pollution Control Act provision? **Yes**

- 
- b. Do you have any contracts over \$10,000? If yes, do the contracts contain the required language for termination of cause, including how it will be affected, and the basis for settlement? **Yes**
  - c. Do you have any construction contracts? If yes, **Yes**, presently doing expansion and rehabilitation projects at our Auburn facility
    - Do the contracts contain the appropriate EEO clause as required? **Yes**
    - If over \$2,000, do the contracts comply with the Davis-Bacon Act? **Yes**
  - d. Do you have contracts over \$100,000 that employ mechanics and/or laborers? If yes, do the contract contain provisions of compliance with 40 USC 3702 and 3704? (40-hour workweek/overtime after 40/safe work environment.) **Yes** for the construction projects
  - e. Do contracts meet the definition of “funding agreement” under 37 CFR §401.2(a)? If yes, do contracts comply with the appropriate requirements concerning “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements” and related regulations?  
[Click or tap here to enter text.](#)
  - f. Do contracts meet mandatory standards and policies related to energy efficiency which are contained in the state energy conservation plan issued in compliance with the Energy Policy and Conservation Act, 42 USC 6201? **Yes**
  - g. Are contract awards ( $\geq$ \$25,000) not made until it is verified that the contractor is not listed on SAM as debarred or suspended? **Yes**. Is the page printed for your records? **Yes**

## **5. Technical Capacity – Project Management**

- a. Are all active projects on schedule and budget? **No**
- b. Are you following all requirements as listed in the signed Cooperative Agreement? **Yes**
- c. Do you have any active construction projects using federal funds that are using force account labor? **No**
- d. Have all contracts for planning and technology been submitted to MaineDOT for their review and oversight? **None at this time**

## **6. Transit Asset Management**

- a. Are all of your agency’s transit vehicles, equipment, and facilities listed in MaineDOT’s TAM plan? **Yes**
- b. Has your accountable executive changed since the TAM plan was updated? **No**

## 7. Satisfactory Continuing Control

- a. Does your agency own any **real property** that was funded with FTA funds? If yes, provide inventory and inspection reports. Yes, no inspection reports yet as the property is still under construction expect completion by 06/2023
  - Is any of the real property considered excess? No
  - If yes provide approved utilization plan. [Click or tap here to enter text.](#)
  - Does any real property have an incidental use? No
  - If yes, is the incidental use compatible with the approved purpose of the property? Describe management of the property. Property will be maintained as indicated in our asset management plan, with routine checklists for office, maintenance facility, parking areas and grounds
  - Is any real property idle? Yes If yes, what efforts have been made to use, lease, or dispose of the idle property? Presently, WMTS has a parcel of land in Mexico, Maine (a portion of our operations prior to 2006) that is under contract for purchase. Do you charge costs to idle properties? Yes, only taxes and insurance. If yes, do you have justification for doing so on file? Yes
  - Is real property being used for its intended purpose? Yes
  - Have you disposed of any real property in the last 3 years? If yes, discuss. Yes, A small piece of land abutting the 76 Merrow Rd facility
  - Are any FTA-funded buildings located in flood hazard areas? If yes, do you have flood insurance? No
- b. Does your agency own any equipment (rolling stock and items over \$5K) that was purchased with FTA or state bond funds? Yes If yes,
  - How do you provide security for vehicles/equipment to prevent loss, damage, theft? We presently used a security camera and alarm system. This system is presently be upgraded and we are adding fencing around bus parking area scheduled to begin 4/24/2023
  - Do you keep MaineDOT staff informed of loss, damage, theft, security concerns, maintenance issues? Yes
  - Do you follow MaineDOT provided disposal instructions? Yes
  - Compare MaineDOT list with provider list. N/A at this time

## 8. Maintenance

- a. Do you have a written maintenance plan for all assets: vehicles/vessels, facilities, equipment? Yes
- b. Are items such as bus wash, lifts, etc. included in your facility maintenance plan? Yes

- 
- c. Are maintenance intervals and inspections followed according to the maintenance plan? Yes
  - d. Discuss your agency's system for identifying and tracking warranty claims. Warranty claims are identified and tracked through of fleet maintenance software (RTA)

## 9. Procurement

- a. Do you have written procurement/purchasing policies? Yes Have they been submitted to MaineDOT? Yes When were they last revised? 2010
  - Does the policy reflect FTA rules and 2CFR Part 200-Uniform Guidance? Yes
  - Does the policy contain protest/dispute procedures? Yes
  - Do you follow your written policy for all procurements? Yes
  - Does the policy address the acquisition of unnecessary or duplicative items? Not at the present time, this policy will be updated and brought to the Board of Directors for the June meeting
- b. Does your agency have a written code of ethics or standards of conduct for employees engaged in the selection, award, and administration of FTA-funded contracts that also includes conflict of interest? Yes
- c. Do all procurements comply with full and open competition? Yes
- d. How do you buy fuel? WMTS purchases fuel from PWs, and retail vendors based on location, type of fuel, and pump price. Fuel bills are reconciled monthly.
- e. Have you procured A&E services during the last 3 years? Yes  
If yes, did you use a qualifications-based selection process? Yes
- f. How do you ensure awards are made to responsible contractors? By checking references, checking SAM.gov, and previous experience.
- g. Do procurement files contain the method of procurement and reason, selection of contract type, contractor selection/rejection, and the basis for contract price. Yes
- h. Do you allow for geographical preference? Yes
- i. Do contracts exceeding \$3,500 (or \$2,000 for construction) contain applicable federal clauses? Yes

## 10. DBE

- a. Do you submit your quarterly DBE reports to the Civil Rights Office as required? Yes
- b. Do any contracts contain a DBE goal? Yes  
If yes, have you provided MaineDOT with the following:
  - The names and addresses of the DBE firms.
  - A description of the work that each DBE is doing.
  - The dollar amount of each DBE firm participating.

- Written documentation by contractors for DBE subcontractors.
  - Written confirmation from the DBE that it is participation that matches the contractors' documentation.
  - If DBE was terminated, why? Yes we provide this information
- c. How do you verify that DBE vendors are paid within 30 days as required by FTA regulation? WMTS presently is not utilizing any DBE's however WMTS pays invoices on a biweekly cycle and invoices are paid on the cycle following the receipt of an invoice.
- d. Do you actively seek out DBEs for contracting opportunities? Yes

## 11. Title VI

- a. Do you have a Title VI plan and complaint process? [Click or tap here to enter text.](#) Date of plan? Last policy approved by the Board in 09/21 Policy is updated and waiting BOD approval in June 2023
- b. How do you notify the public of its rights under Title VI? We provide this information on our website, and all printed brochures and schedules.
- c. Do you have a complaint process for non-Title VI complaints? Please discuss. Yes, WMTS has a complaint form and process that is outlined in the attached Title VI Policy.

## 12. ADA – General

- a. Do you contract with taxis, TNCs, or other private entities? [Click or tap here to enter text.](#)
- If yes, how do you ensure that equivalent accessible services are provided? No
- b. Have you constructed or renovated any facilities in the past three years? WMTS is in the process of doing an expansion that began in July 2021. Present facility is accessible.
- If yes, are they accessible to people with disabilities? Yes
- c. Are all facilities and vehicles accessible to people with disabilities? WMTS has seven vehicles that are not accessible, however there is always accessible vehicles that can support these vehicles when they are in use.
- d. Can lifts be used by ambulatory persons? Yes
- e. Are passengers allowed portable medical equipment? Yes, there may be limitations on some equipment
- f. Are your services made available to the public in accessible formats? Yes
- g. Is your service fixed route or flex route? Fixed
- If fixed, do you offer complimentary paratransit? Yes
  - If flex, do you deviate only for the disabled or everyone
  - How does the public know that it can ask for a deviation? [Click or tap here to enter text.](#)

- 
- h. For ferry providers, is your service accessible? [Click or tap here to enter text.](#)
    - Who is designated as your complaint resolution official (CRO)? Where do you post the name and contact information for the CRO? Do you have a written policy outlining the CROs authority? [Click or tap here to enter text.](#)
  - i. Describe your process to handle ADA complaints: See attached Brunswick Link ADA Policies and Procedures under complaints.
  - j. Describe your policy on service animals: See attached document 12.J service animals
  - k. What training do you offer employees for transporting persons with disabilities? All drivers receive Passenger Assistance Safety and Sensitivity Training offered by CTAA at hire and every two years. WMTS is currently looking for additional training to help drivers with securing newer mobility aids.
    - Is the same training required of volunteer drivers? NA

### **13. ADA – Complementary Paratransit (FIXED ROUTE ONLY – N/A)**

### **14. EEO**

- a. Are you required to have a full EEO program (employ 100 or more transit-related employees and receive > \$1M in FTA funds)? No
  - If yes, have you submitted the full EEO program to MaineDOT? [Click or tap here to enter text.](#)
- b. Are you required to have an abbreviated EEO program (employee 50-99 transit-related employees and receive > \$1M in FTA funds)? Yes
  - If yes, have you submitted the abbreviated EEO program to MaineDOT? Yes, updated one that will be going to the BOD in June included
- c. Do you have a written policy to prevent discrimination, harassment, intimidation, and coercion of employees in the workplace? Yes, in our EEO Policy and our Personnel Policy both policies are attached

### **15. School Bus**

- a. Do you provide school bus service? Discuss. No

### **16. Charter Bus**

- a. Do you provide charter service? No
  - If yes, does the service meet one of the approved exceptions? Which one? [Click or tap here to enter text.](#)
  - If yes, are you complying with federal reporting requirements? [Click or tap here to enter text.](#)
  - Review records on-site. [Click or tap here to enter text.](#)

### **17. Drug Free Workplace Act – not applicable to subrecipients**



**18. Drug and Alcohol Program**

- a. Do you have a board approved D&A policy? Yes policy attached
  - Date of board approval? 09/18/2018
  - Date submitted to MaineDOT? 10/22/2018
  - Provide proof of policy distributed to safety-sensitive employees. Yes
- b. Provide proof of 60 minutes of drug training for safety-sensitive employees. Yes
- c. Are new employees allowed to perform safety-sensitive functions before negative pre-employment drug test? Yes
- d. Are you in a consortium? Yes
  - If yes, do you receive confirmation that the entire consortium meets the required testing levels annually? Yes
  - If no, do you ensure that you are meeting the required annual testing levels? [Click or tap here to enter text.](#)
- e. Provide proof of at least 120 minutes of training for employees authorized to make reasonable suspicion determinations. Yes
- f. Do you request D&A testing records when hiring new safety-sensitive employees from previous employers? Yes
- g. Are random tests spread out over all days of week and hours of your service? Provide proof with a summary to confirm. Yes
- h. Are chain of custody forms reviewed for errors? Discuss how errors are corrected if found. Yes, WMTS contacts the collection site or Northern Light who contacts escreen to correct any errors and provide an affidavit if necessary
- i. Is the name and phone number of your DER posted for employees to see? Yes
- j. Do you have qualifications on file for SAPs, BATs, urine collectors, and MRO? Provide copies to MaineDOT to confirm. Yes
  - Are the SAP qualifications less than 3 years old? Yes
  - Are the other qualifications less than 5 years old? Yes
- k. Are collectors on the required ODAPC list serve? Yes
- l. Discuss when and how you monitor your collection sites: Annual Blind visits
- m. Are records kept in a secure location? Show proof. Yes

**19. Section 5307 (Urban fixed route)**

- a. Is 1% of funding each year used on security measures? NA

**20. Section 5310 (regional transit providers only)**

- a. Explain how 5310 funds awarded to you meet the specific needs of seniors and individuals with disabilities. WMTS provides DR FR and commuter services with accessible vehicles allowing persons with mobility challenges due to age or disability to

be part of the community and access essential needs. WMTS Operations Director position dedicates 20-25% of time to assisting individuals with transit related mobility issues.

- b. Can you ensure that incidental use of 5310 funded vehicles does not result in a reduction of service to the general public? Discuss. Yes

## 21. Section 5311 (Rural services)

- a. Explain your routes and how they serve rural areas. WMTS operates D/R routes throughout Androscoggin, Oxford, and Franklin Counties, we coordinate with commuter routes as often as possible to allow people to get to more urban areas by way of the GreenLine, the GreenLine Connection, the BlueLine and the Lisbon Connection. This allows connecting with citylink, Brunswick Link, Bath City Bus, Concoard Coach, Greyhound, the Breez, and the Downeaster. WMTS tracks unmet needs and works to find solutions to anyone we are unable to serve.
- b. Explain how your service connects to other transit services, including intercity providers: See answer to a. above
- c. How do you promote your services to the general public? [Click or tap here to enter text.](#)
- d. Do you deliver meals? No
- If yes, describe how meal deliver does not affect transportation service to the general public. [Click or tap here to enter text.](#)
  - Confirm that the meal delivery program covers the cost of the added trip purpose. Discuss. [Click or tap here to enter text.](#)

## 22. Other

- a. Check employee break room for the following posters:
- Employee Polygraph Protection Act
  - Equal Employment Opportunity is the Law
  - Fair labor Standards Act / Minimum Wage Poster
  - Job Safety and Health Protection
  - Family Medical Leave Act
  - Notice to Employees/Job Injury
  - Notice to Employees/Unemployment Benefits
  - 5333(b) Special Warranty on letterhead, including Appendices A and C and procedures on how to file a claim?
  - Poster on effects and consequences of substance abuse
  - Name and number of DAPM or DER

## AMERICAN COMMUNITY SURVEY LANGUAGE CODE LIST

Listed are 4-digit census codes, language names and, where applicable, three-letter codes according to international standard ISO 639-3.

### INDO-EUROPEAN LANGUAGES (1053-1056, 1069-1073, 1110-1564)

#### *Haitian (1053-1056)<sup>1</sup>*

1053 Guadeloupean Creole French (gcf)  
1054 Saint Lucian Creole French (acf)  
1055 Haitian (hat)

#### West Germanic languages (1110-1139, 1234)

##### *German (1110-1124)*

1110 German (deu)  
1111 Bavarian (bar)  
1112 Hutterite German (geh)  
1113 Low German (nds)  
1114 Plautdietsch (ptd)  
1115 Swabian (swg)  
1120 Swiss German (gsw)  
1121 Upper Saxon (sxu)  
1122 Limburgish (lim)  
1123 Luxembourgish (ltz)  
  
1125 Pennsylvania German (pdc)  
1130 Yiddish (macrolanguage) (yid)  
1131 Eastern Yiddish (ydd)  
1132 Dutch (nld)  
1133 Vlaams (vls)  
1134 Afrikaans (afr)  
1135 Northern Frisian (frr)  
1136 Western Frisian (fry)  
1234 Scots (sco)

#### Scandinavian languages (1140-1146)

1140 Swedish (swe)  
1141 Danish (dan)  
1142 Norwegian (nor)  
1143 Icelandic (isl)  
1144 Faroese (fao)

1147 Belgium N.E.C.

#### Romance languages (1155-1227)

##### *Italian (1155-1169)*

1155 Italian (ita)  
1156 Corsican (cos)  
1157 Friulian (fur)

1158 Ligurian (lij)  
1159 Lombard (lmo)  
1160 Neapolitan (nap)  
1161 Piemontese (pms)  
1162 Romagnol (rgn)  
1163 Sardinian (macrolanguage) (srd)  
1164 Sicilian (scn)  
1165 Venetian (vec)

##### *French (1170-1175)*

1170 French (fra)  
1172 Jèrriais (nrf)  
1174 Walloon (wln)  
1175 Cajun French (frc)

1176 Occitan (post 1500) (oci)

##### *Spanish (1200-1205)*

1200 Spanish (spa)  
1201 Asturian (ast)  
1202 Ladino (lad)  
1205 Caló (rmq)

1206 Catalan (cat)

##### *Portuguese (1069-1073, 1210-1217)*

1069 Kabuverdianu (kea)<sup>1</sup>  
1072 Upper Guinea Crioulo (pov)<sup>1</sup>  
1210 Portuguese (por)  
1211 Galician (glg)

1218 Aromanian (aen)

1220 Romanian (ron)  
1221 Istro Romanian (ruo)  
1223 Ladin (lld)  
1225 Romansh (roh)

#### Celtic languages (1228-1233)

1228 Welsh (cym)  
1229 Breton (bre)  
1230 Cornish (cor)  
1231 Irish (gle)  
1232 Manx (glv)  
1233 Scottish Gaelic (gla)

1235 Modern Greek (1453-) (ell)

<sup>1</sup> Although they are linguistically Creole languages, some French-based Creoles (Guadeloupean Creole French, Saint Lucian Creole French, and Haitian) and Portuguese-based creoles (Kabuverdianu and Upper Guinea Crioulo) are included under Indo-European languages in standardized tabulations, in order to maintain comparability with ACS estimates prior to 2016.

Note: N.E.C. stands for Not Elsewhere Classified. Whenever possible, language names and three-letter codes follow the ISO-639-3 standard. Other codes have been added for common write-ins that cannot be identified at the ISO-639-3 level, but can be classified within a language family (i.e. Berber languages, Karen languages), or within a geographical region (i.e. Europe N.E.C., Nigeria N.E.C.). Languages within a macrolanguage are coded at the more detailed individual language level whenever possible, and at the macrolanguage level (i.e. Chinese, Arabic, Persian) when it is not possible to determine the individual language from the write-in answer. ACS language questions are only designed to capture spoken languages and do not give accurate estimates of signed languages. Signed languages are recorded within the internal unedited data; however, they are combined with the closest spoken language in the edited data.

1238 Pontic (pnt)  
1242 Albanian (macrolanguage) (sqi)  
1243 Arbëreshë Albanian (aae)  
1244 Gheg Albanian (alh)  
1245 Tosk Albanian (als)

Slavic languages (1250-1280)

1250 Russian (rus)  
1251 Belarusian (bel)  
1252 Rusyn (rue)  
1260 Ukrainian (ukr)  
1262 Czech (ces)  
1263 Slovak (slk)  
1265 Lower Sorbian (dsb)  
1266 Upper Sorbian (hsb)  
1268 Kashubian (csb)  
1269 Silesian (szl)  
1270 Polish (pol)  
1273 Bulgarian (bul)  
1274 Macedonian (mkd)  
1275 Serbo-Croatian (macrolanguage) (hbs)  
1276 Bosnian (bos)  
1277 Croatian (hrv)  
1278 Serbian (srp)  
1280 Slovenian (slv)

Baltic languages (1281-1287)

1281 Lithuanian (lit)  
1283 Standard Latvian (lvs)  
1284 Latgalian (ltg)

1288 Armenian (hye)

Indo-Iranian languages (1289-1543)

*Persian (1289-1307)*

1290 Persian (macrolanguage) (fas)  
1292 Dari (prs)  
1295 Iranian Persian/Farsi (pes)  
1300 Tajik (tgk)  
1302 Bukharic (bhh)  
1303 Hazaragi (haz)  
1304 Judeo-Persian (jpr)  
  
1308 Judeo-Tat (jdt)  
1309 Northern Luri (lcr)  
1310 Parsi (prp)  
1311 Zoroastrian Dari (gbz)  
1312 Dezfuli (def)  
1315 Kurdish (macrolanguage) (kur)  
1316 Central Kurdish (ckb)  
1317 Northern Kurdish (kmr)  
1320 Zaza (macrolanguage) (zza)  
1321 Baluchi (macrolanguage) (bal)  
1322 Eastern Balochi (bgp)  
1323 Southern Balochi (bcc)  
1325 Ossetian (oss)  
1327 Pushto (macrolanguage) (pus)

1328 Northern Pashto (pbu)  
1329 Southern Pashto (pbt)  
1331 Shughni (sgh)  
1333 Wakhi (wbl)

*Indo-Aryan (Indic) languages (1340-1543)*

1340 India N.E.C.

*Hindi (1341-1359)*

1341 Chhattisgarhi (hne)  
1342 Garhwali (gbm)  
1343 Haryanvi (bcg)  
1349 Awadhi (awa)  
1350 Hindi (hin)  
1351 Fiji Hindi (hif)

1360 Urdu (urd)  
1365 Deccan (dcc)  
1370 Memoni (mby)  
1375 Assamese (asm)

*Bengali (1380-1387)*

1380 Bengali (ben)  
1382 Chittagonian (ctg)  
1384 Rangpuri (rkt)  
1386 Sylheti (syl)

1388 Halbi (hlb)  
1400 Rohingya (rhg)

*Punjabi (1420-1429)*

1420 Panjabi (pan)  
1421 Lahnda (macrolanguage) (lah)  
1422 Western Panjabi (pnb)  
1423 Pahari-Potwari (phr)  
1424 Northern Hindko (hno)  
1425 Southern Hindko (hnd)  
1426 Saraiki (skr)  
  
1430 Goan Konkani (gom)  
1435 Konkani (individual language) (knn)  
1440 Marathi (mar)  
1442 Od (odk)  
1450 Gujarati (guj)  
1455 Saurashtra (saz)  
1460 Bhojpuri (bho)  
1463 Magahi (mag)  
1467 Maithili (mai)  
1470 Rajasthani (raj)  
1472 Bagri (bgq)  
1474 Dhatki (mki)  
1478 Lambadi (lmn)  
1480 Marwari (mwr)  
1481 Marwari (India) (rwr)  
1482 Dhundari (dhd)  
1486 Bodo Parja (bdv)  
1488 Desiya (dso)  
1490 Oriya (individual language) (ory)

1491 Sambalpuri (spv)  
 1495 Kashmiri (kas)  
 1497 Khowar (khw)  
 1499 Dangaura Tharu (thl)  
 1500 Nepali (individual language) (npi)  
 1501 Dotyali (dty)  
 1510 Kachhi (kfr)  
 1515 Sindhi (snd)  
 1518 Dogri (dgo)  
 1521 Kumaoni (kfy)  
 1525 Pakistan N.E.C.  
 1526 Dhivehi (div)  
 1530 Sinhala (sin)  
 1540 Romany (rom)  
 1541 Balkan Romani (rmn)  
 1542 Carpathian Romani (rmc)  
 1543 Vlax Romani (rmy)

**ASIAN AND PACIFIC ISLAND LANGUAGES  
 (1643-3798)**

Turkic languages (1643-1684)

1643 Chuvash (chv)  
 1648 Kara-Kalpak (kaa)  
 1649 Kazakh (kaz)  
 1650 Kirghiz (kir)  
 1652 Uzbek (uzb)  
 1653 Northern Uzbek (uzn)  
 1654 Southern Uzbek (uzs)  
 1657 Karachay-Balkar (krc)  
 1658 Bashkir (bak)  
 1659 Tatar (tat)  
 1662 Crimean Tatar (crh)  
 1666 Uighur (uig)  
 1668 Azerbaijani (aze)  
 1669 North Azerbaijani (azj)  
 1670 South Azerbaijani (azb)  
 1675 Turkish (tur)  
 1676 Balkan Gagauz Turkish (bgx)  
 1677 Gagauz (gag)  
 1680 Turkmen (tuk)  
 1681 Yakut (sah)

Mongolic languages (1685-1698)

1685 Daur (dta)  
 1687 Bonan (peh)  
 1688 Tu (mjg)  
 1690 Mongolian (macrolanguage) (mon)  
 1691 Halh Mongolian (khk)  
 1692 Peripheral Mongolian (mvf)  
 1695 Buriat (bua)  
 1696 Russia Buriat (bxr)  
 1698 Kalmyk (xal)

Tungusic languages (1699-1710)

1699 Even (eve)  
 1702 Evenki (evn)  
 1703 Oroqen (orh)  
 1705 Nanai (gld)  
 1708 Manchu (mnc)

Dravidian languages (1711-1798)

1711 Northwestern Kolami (kfb)  
 1716 Kui (India) (kxu)  
 1720 Northern Gondi (gno)  
 1730 Telugu (tel)  
 1735 Badaga (bfq)  
 1737 Kannada (kan)  
 1750 Malayalam (mal)  
 1755 Paniya (pcg)  
 1760 Kodava (kfa)  
 1765 Tamil (tam)  
 1770 Tulu (tey)  
 1775 Brahui (brh)  
 1780 Kurukh (kru)

1799 Burushaski (bsk)

Austro-Asiatic languages (1800-1969)

1800 Korku (kfq)  
 1810 Asuri (asr)  
 1812 Munda (unx)  
 1820 Mahali (mjx)  
 1822 Santali (sat)  
 1824 Turi (trd)  
 1835 Juang (jun)  
 1838 Kharai (khr)  
 1850 Sora (srb)

Mon-Khmer languages (1855-1949)

1855 Khasi (kha)  
 1860 Jah Hut (jah)  
 1870 Central Mnong (cmo)  
 1873 Bahnar (bdq)  
 1876 Koho (kpm)  
 1880 Laven (lbo)  
 1890 Upper Ta'o'ih (tth)  
 1895 Western Bru (brv)  
 1900 Central Khmer (khm)  
 1905 Mon (mnw)  
 1920 Khuen (khf)  
 1922 Khmu (kjg)  
 1925 Lua' (prb)  
 1927 Mal (mlf)  
 1929 Phai (prt)  
 1931 Phong-Kniang (pnx)  
 1935 Eastern Lawa (lwl)  
 1940 Ruching Palaung (pce)

1950 Muong (mtq)  
 1960 Vietnamese (vie)

Sino-Tibetan languages (1970-2429)

*Chinese (1970-2059)*  
1970 Chinese (macrolanguage) (zho)  
1975 Gan Chinese (gan)  
1980 Xiang Chinese (hsn)  
1985 Hakka Chinese (hak)  
1990 Jinyu Chinese (cyj)  
2000 Mandarin Chinese (cmn)  
2010 Min Bei Chinese (mnp)  
2020 Min Dong Chinese (cdo)  
2030 Min Nan Chinese (nan)  
2040 Wu Chinese (wuu)  
2050 Yue Chinese (yue)

Tibeto-Burman languages (2060-2429)

2060 Kulung (Nepal) (kle)  
2065 Gamale Kham (kgj)  
2075 Nepal Bhasa (new)  
2080 Balti (bft)  
2085 Dzongkha (dzo)  
2090 Sikkimese (sip)  
2092 Tshangla (tsj)  
2095 Sherpa (xsr)  
2100 Tibetan (bod)  
2105 Khams Tibetan (khg)  
2115 Gurung (gvr)  
2120 Eastern Tamang (taj)  
2135 Lepcha (lep)  
2140 Adi (adi)  
2145 Mising (mrg)  
2150 Rawang (raw)

*Burmese (2160-2179)*

2160 Burmese (mya)  
2165 Marma (rmz)  
2170 Rakhine (rki)

2175 Zaiwa (atb)  
2185 Lahu (lhu)  
2190 Lisu (lis)  
2195 Sichuan Yi (iii)  
2200 Phunoi (pho)  
2210 Ao Naga (njo)  
2215 Tangkhul Naga (India) (nmf)

*Kuki-Chin languages (2220-2299)*

2220 Falam Chin (cfm)  
2225 Haka Chin (cnh)  
2230 Hmar (hmr)  
2235 Lushai (lus)  
2245 Daai Chin (dao)  
2250 Kaang Chin (ckn)  
2255 Matu Chin (hlt)  
2265 Siyin Chin (csy)  
2270 Tedim Chin (ctd)  
2275 Zou (zom)  
2285 Zotung Chin (czt)

2290 Zyphe Chin (zyp)

2300 Manipuri (mni)  
2310 Toto (txo)  
2320 Bodo (India) (brx)  
2325 Garo (grt)  
2340 Kachin (kac)

*Karen languages (2350-2429)*

2350 Karen languages (kar)  
2355 Bwe Karen (bwe)  
2360 Geko Karen (ghk)  
2365 Western Kayah (kyu)  
2370 Kayan (pdu)  
2375 Mobwa Karen (jkm)  
2380 Pa'O (ppa)  
2385 Pwo Eastern Karen (kjp)  
2390 S'gaw Karen (ksw)

Tai-Kadai languages (2430-2524)

*Thai (2430-2474)*

2430 Thai (tha)  
2435 Northeastern Thai (tts)  
2440 Phu Thai (pht)  
2445 Lü (khb)  
2450 Nyaw (nyw)  
2455 Shan (shn)  
2460 Tai Dam (blt)  
2465 Tai Daeng (tyr)

2475 Lao (lao)  
2485 Bouyei (pcc)  
2490 Zhuang (macrolanguage) (zha)  
2500 Nung (Vietnam) (nut)  
2505 Tày (tyz)  
2515 Southern Dong (kmc)

Hmong-Mien languages (2525-2559)

2525 Iu Mien (ium)

*Hmong (2535-2559)*

2535 Hmong (macrolanguage) (hmn)  
2536 Hmong Daw (mww)  
2537 Hmong Njua (hnj)

Japonic languages (2560-2568)

2560 Japanese (jpn)  
2563 Central Okinawan (ryu)  
2566 Northern Amami-Oshima (ryn)

2569 Ainu (Japan) (ain)  
2575 Korean (kor)

Siberian languages (2577-2589)

2577 Koryak (kpy)  
2579 Itelmen (itl)

2582 Ket (ket)  
2585 Gilyak (niv)  
2588 Northern Yukaghir (ykg)

Austronesian languages (2590-3798)

2590 Buginese (bug)  
2600 Balinese (ban)  
2610 Malagasy (macrolanguage) (mlg)  
2611 Plateau Malagasy (plt)  
2630 Javanese (jav)  
2640 Biatah Bidayah (bth)  
2650 Madurese (mad)  
2660 Achinese (ace)  
2670 Eastern Cham (cjm)  
2675 Western Cham (cja)  
2680 Chru (cje)  
2690 Jarai (jra)  
2700 Rade (rad)  
2710 Malay (macrolanguage) (msa)  
2715 Malay (individual language) (zlm)  
2716 Brunei (kxd)  
2730 Kubu (kvb)  
2740 Minangkabau (min)  
2750 Musi (mui)  
2760 Negeri Sembilan Malay (zmi)  
2770 Indonesian (ind)  
2780 Iban (iba)  
2790 Tetum (tet)  
2800 Central Melanau (mel)  
2810 Central Dusun (dtp)  
2820 Coastal Kadazan (kzj)  
2830 Kelabit (kzi)  
2840 Mainstream Kenyah (xkl)  
2850 Sundanese (sun)

Philippine languages (2870-3219)

2870 Pampanga (pam)  
2880 Bolinao (smk)  
2890 Botolan Sambal (sbl)  
2900 Sambal (xsb)  
  
Tagalog (2910-2939)  
2910 Filipino (fil)  
2920 Tagalog (tgl)  
  
2940 Mandaya (mry)  
2950 Cebuano (ceb)  
2960 Hiligaynon (hil)  
2970 Masbatenyo (msb)  
2980 Waray (Philippines) (war)  
2990 Aklanon (akl)  
3000 Cuyonon (cyo)  
3010 Kinaray-A (krj)  
3020 Butuanon (btw)  
3030 Tausug (tsg)  
3040 Surigaonon (sgd)  
3050 Bikol (macrolanguage) (bik)  
3055 Central Bikol (bcl)

3060 Gorontalo (gor)  
3070 Obo Manobo (obo)  
3080 Ibaloi (ibl)  
3090 Pangasinan (pag)  
3100 Batad Ifugao (ifb)  
3110 Tuwali Ifugao (ifk)  
3120 Bontok (macrolanguage) (bnc)  
3125 Central Bontok (lbk)  
3130 Kankanaey (kne)  
3150 Iloko (ilo)  
3160 Ibanag (ibg)  
3170 Itawit (itv)  
3180 Ivatan (ivv)  
3190 Tondano (tdn)

Micronesian languages (3220-3419)

3220 Chamorro (cha)  
3250 Gilbertese (gil)  
3260 Kosraean (kos)  
3270 Marshallese (mah)  
3280 Carolinian (cal)  
3290 Mokilese (mkj)  
3300 Pingelapese (pif)  
3310 Mortlockese (mrl)  
3320 Nauru (nau)  
3330 Palauan (pau)  
3340 Pohnpeian (pon)  
3350 Chuukese (chk)  
3360 Puluwatese (puw)  
3370 Ulithian (uli)  
3380 Woleaian (woe)  
3390 Satawalese (stw)  
3400 Sonsorol (sov)  
3410 Yapese (yap)

Polynesian languages (3420-3798)

3420 Samoan (smo)  
3430 Kapingamarangi (kpg)  
3440 Nukuoro (nkr)  
3470 Tuvalu (tvl)  
3480 Tokelau (tkl)  
3490 Wallisian (wls)  
3500 Tonga (Tonga Islands) (ton)  
3510 Niuean (niu)  
3520 North Marquesan (mrq)  
3530 Rapanui (rap)  
3540 Tahitian (tah)  
3550 Rarotongan (rar)  
3560 Maori (mri)  
3570 Hawaiian (haw)  
3600 Eastern Malayo-Polynesian languages N.E.C.  
3610 Fijian (fij)  
3620 Rotuman (rtm)  
3630 Labo (mwi)  
3640 Hano (lml)  
3650 Mota (mtt)  
3660 Kwamera (tnk)  
3670 Lau (llu)

3680 Amara (aie)  
 3690 Arifama-Miniafia (aai)  
 3700 Kilivila (kij)  
 3710 Motu (meu)  
 3720 Kuanua (ksd)  
 3730 Niwer Mil (hrc)  
 3740 Penchal (pek)  
 3750 Kola (kvv)  
 3755 Sula (szn)  
 3760 Boano (bpw)

**OTHER AND UNSPECIFIED LANGUAGES (1000-1052, 1057-1063, 1074-1109, 1565-1642, 3799-9499, 9600-9999)**

*Creole languages (1000-1052, 1057-1063, 1074-1109)*

*English-based Creole languages (1000-1032, 1043-1050)*

1000 Jamaican Creole English (jam)  
 1001 Bajan (bjs)  
 1003 Antigua and Barbuda Creole English (aig)  
 1004 Bahamas Creole English (bah)  
 1005 Belize Kriol English (bjz)  
 1006 Grenadian Creole English (gcl)  
 1007 Guyanese Creole English (gyn)  
 1008 Tobagonian Creole English (tgh)  
 1009 Trinidadian Creole English (trf)  
 1010 Vincentian Creole English (svc)  
 1012 Virgin Islands Creole English (vic)  
 1015 Eastern Maroon Creole (djk)  
 1016 Saramaccan (srm)  
 1017 Sranan Tongo (srn)  
 1020 Sea Island Creole (gul)  
 1022 Hawai'i Creole English (hwc)  
 1025 Krio (kri)  
 1027 Cameroon Pidgin (wes)  
 1028 Nigerian Pidgin (pcm)  
 1030 Liberian English (lir)  
 1043 Bislama (bis)  
 1045 Pijin (pis)  
 1047 Tok Pisin (tpi)

1033 Flaaitaal (fly)  
 1034 Nubi (kcn)  
 1038 Kituba (Democratic Republic of Congo) (ktu)  
 1040 Sango (sag)  
 1051 Hiri Motu (mho)  
 1057 Louisiana Creole French (lou)  
 1059 Morisyen (mfe)  
 1061 R union Creole French (rcf)  
 1064 Chavacano (cbk)  
 1066 Papiamentu (pap)  
 1074 Macanese (mzs)  
 1077 Naga Pidgin (nag)  
 1080 Manado Malay (xmm)  
 1081 North Moluccan Malay (max)

1088 Chinook jargon (chn)  
 1107 Pidgin N.E.C.  
 1109 Creole N.E.C.

*Uralic languages (1565-1602)*

1565 Finnish (fin)  
 1566 Karelian (krl)  
 1570 Standard Estonian (ekk)  
 1571 V ro (vro)  
 1572 Liv (liv)  
 1573 Votic (vot)  
 1575 Inari Sami (smn)  
 1576 Skolt Sami (sms)  
 1577 Ume Sami (sju)  
 1578 Lule Sami (smj)  
 1579 Northern Sami (sme)  
 1580 Pite Sami (sje)  
 1582 Hungarian (hun)  
 1584 Mari (mhg)  
 1585 Eastern Mari (mhr)  
 1587 Erzya (myv)  
 1588 Moksha (mdf)  
 1589 Komi-Permyak (koi)  
 1590 Komi-Zyrian (kpz)  
 1591 Udmurt (udm)  
 1594 Samoyedic languages (syd)  
 1595 Nenets (yrk)  
 1596 Nganasan (nio)  
 1597 Kamas (xas)  
 1599 Khanty (kca)  
 1600 Mansi (mns)

*Caucasian languages (1603-1642)*

1603 Georgian (kat)  
 1605 Svan (sva)  
 1606 Laz (lzz)  
 1607 Mingrelian (xmf)  
 1609 North Caucasian languages (ccn)  
 1610 Avaric (ava)  
 1612 Lak (lbe)  
 1615 Lezghian (lez)  
 1616 Tabassaran (tab)  
 1620 Chechen (che)  
 1621 Ingush (inh)  
 1625 Dargwa (dar)  
 1630 Abaza (abq)  
 1631 Abkhazian (abk)  
 1635 Adyghe (ady)  
 1636 Kabardian (kbd)

3799 Papua New Guinea N.E.C.  
 3800 Kuman (kdi)  
 3810 Wahgi (wgi)  
 3830 Oroko (oro)  
 3850 Enga (enq)  
 3870 Southern Kiwai (kjd)  
 3890 Mala (Papua New Guinea) (ped)  
 3910 Waube (kop)



3930 Marind (mrz)  
3950 Laua (luf)  
3970 Wiru (wiu)  
4150 Tabla (tnm)  
4170 Qaqet (byx)  
4190 Gresi (grs)  
4200 Nimboran (nir)  
4240 Rapoisi (kyx)  
4270 Tanggu (tgu)  
4320 Sinagen (siu)  
4440 Eastern Arrernte (aer)  
4450 Yan-nhangu (jay)

Afro-Asiatic languages (4500-4899)

*Semitic languages (4500-4644)*

*Arabic (4500-4544)*

4500 Arabic (macrolanguage) (ara)  
4502 Algerian Arabic (arq)  
4504 Chadian Arabic (shu)  
4506 Cypriot Arabic (acy)  
4508 Egyptian Arabic (arz)  
4510 Gulf Arabic (afb)  
4512 Mesopotamian Arabic (acm)  
4514 Moroccan Arabic (ary)  
4516 North Levantine Arabic (apc)  
4518 Omani Arabic (acx)  
4520 Sanaani Arabic (ayn)  
4522 South Levantine Arabic (ajp)  
4524 Standard Arabic (arb)  
4526 Sudanese Arabic (apd)  
4528 Tunisian Arabic (aeb)  
4530 Hassaniyya (mey)  
4535 Maltese (mlt)  
4540 Judeo-Arabic (jrb)

4545 Hebrew (heb)  
4555 Syriac (macrolanguage) (syr)  
4560 Assyrian Neo-Aramaic (aii)  
4565 Chaldean Neo-Aramaic (cld)  
4570 Hulaulá (huy)  
4575 Turoyo (tru)  
4590 Amharic (amh)  
4600 Harari (har)  
4610 Silt'e (stv)  
4620 Sebat Bet Gurage (sgw)  
4630 Tigre (tig)  
4640 Tigrinya (tir)

4645 Coptic (cop)

*Berber languages (4660-4719)*

4660 Berber languages (ber)  
4661 Siwi (siz)  
4670 Central Atlas Tamazight (tzm)  
4675 Tachelhit (shi)  
4680 Kabyle (kab)

4685 Nafusi (jbn)  
4690 Tachawit (shy)  
4695 Tarifit (rif)  
4700 Tamashek (macrolanguage) (tmh)  
4701 Tamasheq (taq)  
4710 Zenaga (zen)

*Chadic languages (4720-4789)*

4720 Bura-Pabir (bwr)  
4725 Huba (hbb)  
4735 Bata (bta)  
4740 Gidar (gid)  
4750 Hausa (hau)  
4760 Tangale (tan)  
4765 Cakfem-Mushere (cky)

*Cushitic languages (4790-4899)*

4790 Bilin (byn)  
4800 Afar (aar)  
4805 Saho (ssy)  
4815 Hadiyya (hdy)  
4825 Sidamo (sid)  
4830 Oromo (macrolanguage) (orm)  
4832 Borana-Arsi-Guji Oromo (gax)  
4834 Eastern Oromo (hae)  
4836 West Central Oromo (gaz)  
4840 Somali (som)  
4845 Garre (gex)  
4850 Maay (ymm)  
4855 Beja (bej)

*Omotiic languages (4860-4899)*

4860 Aari (aiw)  
4870 Kafa (kbr)  
4880 Wolaytta (wal)

Nilo-Saharan languages (4900-5119)

4900 Mangbetu (mdj)  
4905 Lugbara (lgb)  
4910 Moru (mgd)  
4915 Ma'di (mhi)  
4919 Laka (Chad) (lap)  
4920 Ngambay (sba)  
4925 Sar (mwm)  
4930 Sara Kaba Náà (kwv)  
4935 Ama (Sudan) (nyi)  
4940 Didinga (did)  
4950 Kalenjin (macrolanguage) (kln)  
4953 Kipsigis (sgc)  
4955 Nandi (niq)  
4960 Pökoot (pko)  
4965 Dinka (macrolanguage) (din)  
4967 Southwestern Dinka (dik)  
4970 Nuer (nus)  
4975 Adhola (adh)  
4978 Acoli (ach)  
4980 Lango (Uganda) (laj)  
4985 Alur (alz)

4990 Luo (Kenya and Tanzania) (luo)  
 4995 Anuak (anu)  
 5000 Luwo (lwo)  
 5005 Shilluk (shk)  
 5010 Mabaan (mfz)  
 5015 Bari (bfa)  
 5020 Kakwa (keo)  
 5030 Otuho (lot)  
 5035 Masai (mas)  
 5040 Teso (teo)  
 5045 Karamojong (kdj)  
 5048 Turkana (tuv)  
 5055 Nobiin (fia)  
 5060 Kanuri (macrolanguage) (kau)  
 5061 Central Kanuri (knc)  
 5063 Manga Kanuri (kby)  
 5070 Tedaga (tuq)  
 5075 Zaghawa (zag)  
 5080 Amdang (amj)  
 5085 Fur (fvr)  
 5090 Katcha-Kadugli-Miri (xtc)  
 5095 Kunama (kun)  
 5100 Maba (Chad) (mde)  
 5105 Masalit (mls)  
 5110 Kibet (kie)  
 5115 Koyraboro Senni Songhay (ses)  
 5117 Zarma (dje)  
  
 5120 Korana (kqz)  
 5125 Gana (gnk)  
 5127 Nama (Namibia) (ylo)  
 5130 Hadza (hts)  
 5135 Sandawe (sad)

*Niger-Congo languages (5140-6701)*

*Bantoid languages (5140-5829)*

5140 Bantu languages (bnt)  
 5145 Samba Daka (ccg)  
  
*Swahili (5150-5159)*  
 5150 Swahili (macrolanguage) (swa)  
 5151 Swahili (individual language) (swh)  
 5152 Congo Swahili (swc)  
  
 5160 Ekajuk (eka)  
 5170 Nkem-Nkum (isi)  
 5180 Ejagham (etu)  
 5185 Bankal (jjr)  
 5190 Mama (mma)  
 5195 Kenyang (ken)  
 5200 Mbe (mfo)  
 5205 Venda (ven)  
 5210 Bembe (bmb)  
 5220 Nyanga (nyj)  
 5225 Mochi (old)  
 5230 Kikuyu (kik)

5235 Meru (mer)  
 5240 Embu (ebu)  
 5245 Kamba (Kenya) (kam)  
 5248 Giryama (nyf)  
 5250 Sagalla (tga)  
 5255 Sukuma (suk)  
 5260 Nyamwezi (nym)  
 5265 Hehe (heh)  
 5270 Pangwa (pbr)  
 5275 Zigula (ziw)  
 5278 Mushungulu (xma)  
 5280 Kongo (macrolanguage) (kon)  
 5281 Koongo (kng)  
 5283 Laari (ldi)  
 5285 Kimbundu (kmb)  
 5290 Haya (hay)  
 5300 Luyia (macrolanguage) (luy)  
 5301 Bukusu (bxk)  
 5302 East Nyala (nle)  
 5303 Idakho-Isukha-Tiriki (ida)  
 5307 Logooli (rag)  
 5310 Saamia (ism)  
 5315 Gusii (guz)  
 5320 Masaaba (myx)  
 5330 Nyoro (nyo)  
 5335 Nyankole (nyn)  
 5340 Chiga (cgg)  
 5345 Ganda (lug)  
 5350 Soga (xog)  
 5355 Gwere (gwr)  
 5360 Tooro (ttj)  
 5365 Kinyarwanda (kin)  
 5370 Rundi (run)  
 5375 Fuliiru (flr)  
 5380 Nyemba (nba)  
 5385 Luvale (lue)  
 5390 Lozi (loz)  
 5400 Kaonde (kqn)  
 5405 Luba-Lulua (lua)  
 5407 Luba-Katanga (lub)  
 5410 Lunda (lun)  
 5415 Bemba (Zambia) (bem)  
 5420 Mambwe-Lungu (mgr)  
 5425 Lamba (lam)  
 5430 Ila (ilb)  
 5435 Lenje (leh)  
 5437 Tonga (Zambia) (toi)  
 5445 Nyanja (nya)  
 5455 Tonga (Nyasa) (tog)  
 5460 Nsenga (nse)  
 5462 Sena (seh)  
 5465 Tumbuka (tum)  
 5470 Makhwa (vmw)  
 5475 Matumbi (mgw)  
 5480 Yao (yao)  
 5485 Makonde (kde)  
 5490 Herero (her)  
 5495 Umbundu (umb)

5500	Kuanyama (kua)	5765	Meta' (mgo)
5505	Xhosa (xho)	5770	Ngie (ngj)
5510	Zulu (zul)	5775	Ngwo (ngn)
5515	Swati (ssw)	5780	Babanki (bbk)
5520	North Ndebele (nde)	5785	Kom (Cameroon) (bkm)
5525	Shona (sna)	5790	Oku (oku)
5530	Ndau (ndc)	5795	Lamnso' (lns)
5535	Kalanga (kck)	5800	Kenswei Nsei (ndb)
5540	Tswana (tsn)	5805	Vengo (bav)
5545	Northern Sotho (nso)	5810	Aghem (agq)
5546	Southern Sotho (sot)	5815	Isu (Menchum Division) (isu)
5550	Tsonga (tso)	5820	Njebi (nzb)
5555	Bafia (ksf)		
5560	Basa (Cameroon) (bas)		<i>Mande languages (5830-5939)</i>
5565	Nyokon (nvo)	5830	Soninke (snk)
5570	Nomaande (lem)	5835	Southern Bobo Madaré (bwq)
5575	Bube (bvb)	5840	Kuranko (knk)
5580	Benga (bng)	5845	Mandingo (macrolanguage) (man)
5585	Mokpwe (bri)	5850	Mandinka (mnk)
5590	Duala (dua)	5853	Eastern Maninkakan (emk)
5595	Ewondo (ewo)	5855	Western Maninkakan (mlq)
5600	Eton (Cameroon) (eto)	5860	Bambara (bam)
5605	Bulu (Cameroon) (bum)	5865	Dyula (dyu)
5610	Fang (Equatorial Guinea) (fan)	5870	Mahou (mxx)
5615	Oroko (bdu)	5880	Kono (Sierra Leone) (kno)
5620	Mbo (zms)	5885	Vai (vai)
5625	Akoose (bss)	5890	Susu (sus)
5630	Bakaka (bqz)	5895	Yalunka (yal)
5633	Punu (puu)	5900	Kpelle (macrolanguage) (kpe)
5635	Ibali Teke (tek)	5901	Liberia Kpelle (xpe)
5640	Bangala (bxg)	5905	Bandi (bza)
5645	Lingala (lin)	5910	Mende (Sierra Leone) (men)
5650	Mabaale (mmz)	5915	Loma (Liberia) (lom)
5655	Bangi (bni)	5917	Toma (tod)
5660	Ntomba (nto)	5920	Bissa (bib)
5665	Mongo (lol)	5925	Dan (dnj)
5670	Ligenza (lgz)	5930	Mano (mev)
5675	Bwa (bww)	5935	Gagu (ggu)
5677	Tetela (tll)		
5680	Abon (abo)		<i>Fulah-Wolof languages (5940-5959)</i>
5683	Batu (btu)	5940	Fulah (macrolanguage) (ful)
5685	Tiv (tiv)	5942	Adamawa Fulfulde (fub)
5695	Bamileke languages (bai)	5945	Pulaar (fuc)
5696	Fe'fe' (fmp)	5946	Pular (fuf)
5700	Mengaka (xmg)	5950	Wolof (wol)
5705	Ngiemboon (nnh)		
5710	Ngwe (nwe)	5960	Serer (srr)
5715	Yemba (ybb)	5965	Wamey (cou)
5720	Bafut (bfd)	5970	Balanta-Kentohe (ble)
5721	Bambili-Bambui (baw)	5975	Jola-Fonyi (dyo)
5725	Mendankwe-Nkwen (mfd)	5980	Mandjak (mfv)
5730	Ngemba (nge)	5985	Gola (gol)
5735	Pinyin (pny)	5990	Krim (krm)
5740	Limbum (lmp)	5995	Southern Kisi (kss)
5745	Bamali (bbq)	6000	Timne (tem)
5750	Bamun (bax)	6005	West-Central Limba (lia)
5755	Medumba (byv)		
5760	Mungaka (mhk)		

*Gur languages (6015-6119)*

6015 Baatonum (bba)  
6020 Nafaanra (nfr)  
6025 Cebaara Sénoufo (sef)  
6026 Djimini Sénoufo (dyi)  
6035 Ntcham (bud)  
6040 Gourmanchéma (gux)  
6045 Buli (Ghana) (bwu)  
6050 Dagbani (dag)  
6055 Kusaal (kus)  
6060 Mampruli (maw)  
6065 Mossi (mos)  
6070 Farefare (gur)  
6075 Southern Dagaare (dga)  
6080 Wali (Ghana) (wlx)  
6085 Kaansa (gna)  
6090 Kasem (xsm)  
6095 Kabiyè (kbp)  
6098 Tem (kdh)  
6100 Paasaal (sig)  
6105 Vagla (vag)  
6110 Wara (wbf)

*Kwa languages (6120-6249)*

*Akan (6120-6134)*

6120 Akan (macrolanguage) (aka)  
6125 Fanti (fat)  
6130 Twi (twi)

6135 Anyin (any)  
6140 Baoulé (bci)  
6145 Sehwi (sfw)  
6150 Nzima (nzi)  
6155 Gonja (gjn)  
6160 Krache (kye)  
6165 Nawuri (naw)  
6170 Awutu (afu)  
6175 Larteh (lar)  
6180 Logba (lgq)  
6185 Sekpele (lip)  
6190 Adioukrou (adj)  
6195 Attié (ati)  
6200 Adangme (ada)  
6205 Ga (gaa)  
6210 Adangbe (adq)  
6215 Ikposo (kpo)  
6220 Aja (Benin) (ajg)  
6225 Gun (guw)  
6230 Ewe (ewe)  
6235 Fon (fon)  
6240 Gen (gej)  
6245 Waci Gbe (wci)

*Ijoid languages (6250-6284)*

6250 Southeast Ijo (ijs)  
6255 Ibani (iby)  
6260 Kalabari (ijn)  
6265 Kirike (okr)

6270 Izon (ijc)  
6275 Biseni (ije)  
6280 Arigidi (aqg)

*Defoid languages (6285-6299)*

6285 Igala (igl)  
6290 Yoruba (yor)  
6293 Ifè (ife)  
6295 Isekiri (its)

*Edoid languages (6300-6356)*

6300 Bini (bin)  
6305 Esan (ish)  
6310 Emai-Iuleha-Ora (ema)  
6315 Epie (epi)  
6320 Ivbie North-Okpela-Arhe (atg)  
6325 Uneme (une)  
6330 Yekhee (ets)  
6335 Iyayu (iya)  
6340 Isoko (iso)  
6345 Okpe (Southwestern Edo) (oke)  
6350 Urhobo (urh)  
6355 Uvbie (evh)

*Idomoid languages (6357-6369)*

6357 Idoma (idu)  
6360 Igede (ige)  
6363 Yala (yba)  
6365 Ekpeye (ekp)

*Igboid languages (6370-6389)*

6370 Igbo (ibo)  
6375 Ika (ikk)  
6378 Ikwere (ikw)  
6381 Ogbah (ogc)  
6384 Ukwuani-Aboh-Ndoni (ukw)

6390 Jibu (jib)  
6395 Kutep (kub)  
6400 Bauchi (bsf)  
6405 Bina (Nigeria) (byj)  
6408 Tumi (kku)  
6410 Ebira (igb)  
6415 Gade (ged)  
6420 Gbagyi (gbr)  
6425 Nupe-Nupe-Tako (nup)  
6435 Adara (kad)  
6440 Berom (bom)  
6445 Eggon (ego)  
6450 Jju (kaj)  
6455 Ukaan (kcf)

*Kru languages (6460-6499)*

6460 Wané (hwa)  
6465 Kuwaa (blh)  
6470 Bassa (bsq)  
6475 Grebo (macrolanguage) (grb)  
6476 Northern Grebo (gbo)

6480 Klao (klu)  
 6485 Eastern Krahn (kqo)  
 6486 Western Krahn (krw)  
 6490 Sapo (krn)  
  
 6500 Efik (efi)  
 6505 Anaang (anw)  
 6510 Ibibio (ibb)  
 6515 Ekit (eke)  
 6520 Ibino (ibn)  
 6525 Obolo (ann)  
 6530 Oro (orx)  
 6535 Eleme (elm)  
 6540 Gokana (gkn)  
 6545 Khana (ogo)  
 6550 Tee (tkq)  
 6555 Abua (abn)  
 6560 Agwagwune (yay)  
 6563 Kohumono (bcs)  
 6565 Legbo (agb)  
 6570 Lokaa (yaz)  
 6575 Olulumo-Ikom (iko)  
 6580 Bete-Bendi (btt)  
 6585 Bokyi (bky)  
 6590 Baka (Cameroon) (bkc)  
 6595 Mayogo (mdm)  
 6600 Gbaya (gba)  
 6601 Northwest Gbaya (gya)  
 6605 Zande (individual language) (zne)  
 6610 Day (dai)  
 6615 Mbum (mdd)  
 6620 Samba Leko (ndi)  
 6625 Teme (tdo)  
 6630 Kaan (ldl)  
 6635 Tula (tul)  
 6640 Jamsay Dogon (djm)  
 6650 Moro (mor)  
  
 6702 Benin N.E.C.  
 6707 Cameroon N.E.C.  
 6716 Eritrea N.E.C.  
 6717 Ethiopia N.E.C.  
 6719 Gambia N.E.C.  
 6720 Ghana N.E.C.  
 6721 Guinea N.E.C.  
 6723 Kenya N.E.C.  
 6725 Liberia N.E.C.  
 6728 Mali N.E.C.  
 6733 Mozambique N.E.C.  
 6734 Namibia N.E.C.  
 6735 Niger N.E.C.  
 6736 Nigeria N.E.C.  
 6738 Senegal N.E.C.  
 6740 Sierra Leone N.E.C.  
 6745 Sudan N.E.C.  
 6747 Tanzania N.E.C.  
 6750 Uganda N.E.C.  
 6795 Africa N.E.C.

Native North American languages (6800-7099)

*Aleut languages (6800-6814)*

6800 Aleut (ale)  
 6801 Inupiaq (macrolanguage) (ipk)  
 6802 North Alaskan Inupiatun (esi)  
 6803 Northwest Alaska Inupiatun (esk)  
 6804 Eastern Canadian Inuktitut (ike)  
 6806 Greenlandic (kal)  
 6808 Pacific Gulf Yupik (ems)  
 6809 Central Siberian Yupik (ess)  
 6810 Central Yupik (esu)

*Algonquian languages (6815-6848)*

6815 Algonquin (alq)  
 6817 Mohegan-Pequot (xpq)  
 6818 Narragansett (xnt)  
 6819 Powhatan (pim)  
 6820 Wampanoag (wam)  
 6821 Lumbee (lmz)  
 6822 Arapaho (arp)  
 6823 Gros Ventre (ats)  
 6824 Siksika (bla)  
 6825 Cheyenne (chy)  
 6827 Cree (cre)  
 6828 Michif (crg)  
 6829 Delaware (del)  
 6830 Munsee (umu)  
 6831 Unami (unm)  
 6832 Nanticoke (nnt)  
 6833 Meskwaki (sac)  
 6834 Kickapoo (kic)  
 6835 Menominee (mez)  
 6837 Miami (mia)  
 6838 Mi'kmaq (mic)  
 6839 Ojibwa (oji)  
 6840 Chippewa (ciw)  
 6841 Ottawa (otw)  
 6842 Severn Ojibwa (ojs)  
 6843 Potawatomi (pot)  
 6844 Malecite-Passamaquoddy (pqm)  
 6845 Eastern Abnaki (aaq)  
 6846 Western Abnaki (abe)  
 6848 Shawnee (sjw)

6849 Wiyot (wiy)  
 6850 Yurok (yur)  
 6856 Kutenai (kut)  
 6857 Quileute (qui)  
 6859 Kwakiutl (kwk)  
 6861 Ditidaht (dtd)  
 6862 Nuuchah-nulth (nuk)  
 6863 Makah (myh)

*Salish languages (6866-6891)*

6866 Quinault (qun)  
 6867 Lower Chehalis (cea)

6868 Upper Chehalis (cjh)  
 6869 Cowlitz (cow)  
 6872 Clallam (clm)  
 6873 Coeur d'Alene (crd)  
 6874 Columbia-Wenatchi (col)  
 6875 Okanagan (oka)  
 6876 Kalispel-Pend d'Oreille (fla)  
 6877 Spokane (spo)  
 6878 Shuswap (shs)  
 6879 Halkomelem (hur)  
 6880 Straits Salish (str)  
 6881 Nooksack (nok)  
 6883 Lushootseed (lut)  
 6884 Skagit (ska)  
 6885 Snohomish (sno)  
 6886 Southern Puget Sound Salish (slh)  
 6888 Tillamook (til)  
 6890 Twana (twa)

6892 Haida (macrolanguage) (hai)  
 6893 Northern Haida (hdn)  
 6894 Southern Haida (hax)

*Eyak-Athabaskan languages (6895-6935)*

6895 Athapaskan languages (ath)  
 6897 Eyak (eya)  
 6898 Tlingit (tli)  
 6900 Slave (Athapaskan) (den)  
 6902 Chilcotin (clc)  
 6903 Ahtena (aht)  
 6904 Tanaina (tfn)  
 6905 Degexit'an (ing)  
 6906 Koyukon (koy)  
 6907 Holikachuk (hoi)  
 6908 Upper Kuskokwim (kuu)  
 6909 Lower Tanana (taa)  
 6910 Tanacross (tcb)  
 6911 Upper Tanana (tau)  
 6912 Northern Tutchone (ttm)  
 6913 Southern Tutchone (tce)  
 6914 Gwich'in (gwi)  
 6915 Han (haa)  
 6916 Chetco (ctc)  
 6917 Coquille (coq)  
 6918 Galice (gce)  
 6919 Tolowa (tol)  
 6920 Tututni (tuu)  
 6921 Hupa (hup)  
 6922 Kato (ktw)  
 6923 Mattole (mvb)  
 6924 Wailaki (wlk)  
 6927 Jicarilla Apache (apj)  
 6928 Lipan Apache (apl)  
 6929 Mescalero-Chiricahua Apache (apm)  
 6930 Western Apache (apw)  
 6931 Kiowa Apache (apk)  
 6933 Navajo (nav)

*Kiowa-Tanoan languages (6936-6941)*

6936 Kiowa (kio)  
 6937 Northern Tiwa (twf)  
 6938 Southern Tiwa (tix)  
 6939 Tewa (USA) (tew)  
 6940 Jemez (tow)

*Penutian languages (6942-6976)*

6942 Northeast Maidu (nmu)  
 6943 Northwest Maidu (mjd)  
 6944 Nisenan (nsz)  
 6946 Northern Ohlone (cst)  
 6948 Coast Miwok (csi)  
 6949 Plains Miwok (pmw)  
 6950 Central Sierra Miwok (csm)  
 6951 Northern Sierra Miwok (nsq)  
 6952 Southern Sierra Miwok (skd)  
 6955 Nomlaki (nol)  
 6956 Patwin (pwi)  
 6957 Wintu (wnw)  
 6960 Yokuts (yok)  
 6961 Kalapuya (kyl)  
 6962 Siuslaw (sis)  
 6963 Klamath-Modoc (kla)  
 6965 Nez Perce (nez)  
 6966 Tenino (tqn)  
 6967 Umatilla (uma)  
 6968 Walla Walla (waa)  
 6969 Yakama (yak)  
 6971 Chinook (chh)  
 6972 Wasco-Wishram (wac)  
 6974 Gitxsan (git)  
 6975 Nisga'a (ncg)  
 6976 Tsimshian (tsi)

*Hokan languages (6977-7009)*

6978 Achumawi (acv)  
 6979 Atsugewi (atw)  
 6980 Karok (kyh)  
 6981 Central Pomo (poo)  
 6982 Kashaya (kju)  
 6983 Southern Pomo (peq)  
 6984 Northern Pomo (pej)  
 6985 Eastern Pomo (peb)  
 6986 Northeastern Pomo (pef)  
 6987 Southeastern Pomo (pom)  
 6988 Shasta (sht)  
 6989 Washo (was)  
 6990 Maricopa (mrc)  
 6991 Mohave (mov)  
 6992 Quechan (yum)  
 6994 Kumiai (dih)  
 6995 Cocopa (coc)  
 6997 Havasupai-Walapai-Yavapai (yuf)  
 7000 Barbareño (boi)  
 7001 Ineseño (inz)  
 7002 Purisimeño (puy)  
 7003 Ventureño (veo)

7004 Cruzeño (crz)  
7005 Obispeño (obi)  
7007 Chimariko (cid)  
7008 Esselen (esq)  
7009 Salinan (sln)

7010 Tonkawa (tqw)  
7011 Yuchi (yuc)

*Siouan languages (7013-7027)*

7013 Crow (cro)  
7014 Hidatsa (hid)  
7015 Mandan (mhq)  
7016 Catawba (chc)  
7017 Assiniboine (asb)  
7018 Dakota (dak)  
7019 Lakota (lkt)  
7020 Stoney (sto)  
7022 Iowa-Oto (iow)  
7023 Ho-Chunk (win)  
7024 Kansa (ksk)  
7025 Omaha-Ponca (oma)  
7026 Osage (osa)  
7027 Quapaw (qua)

*Muskogean languages (7028-7033)*

7028 Alabama (akz)  
7029 Koasati (cku)  
7030 Mikasuki (mik)  
7031 Creek (mus)  
7032 Choctaw (cho)  
7033 Chickasaw (cic)  
  
7034 Chitimacha (ctm)  
7036 Yuki (yuk)  
7037 Wappo (wao)  
7039 Eastern Keres (kee)  
7040 Western Keres (kjq)

*Iroquoian languages (7041-7050)*

7042 Iroquoian languages (iro)  
7043 Mohawk (moh)  
7044 Oneida (one)  
7045 Onondaga (ono)  
7046 Cayuga (cay)  
7047 Seneca (see)  
7048 Wyandot (wya)  
7049 Tuscarora (tus)  
7050 Cherokee (chr)

*Caddoan languages (7051-7055)*

7052 Caddo (cad)  
7053 Arikara (ari)  
7054 Pawnee (paw)  
7055 Wichita (wic)

7059 Zuni (zun)

*Uto-Aztecan languages (7060-7124)*

7060 Comanche (com)  
7062 Shoshoni (shh)  
7064 Panamint (par)  
7066 Mono (USA) (mnr)  
7068 Northern Paiute (pao)  
7069 Ute-Southern Paiute (ute)  
7070 Kawaiisu (xaw)  
7072 Cahuilla (chl)  
7074 Cupeño (cup)  
7076 Luiseno (lui)  
7078 Serrano (ser)  
7080 Hopi (hop)  
7082 Tübatulabal (tub)  
7084 Tohono O'odham (ood)  
7100 Southeastern Tepehuan (stp)  
7103 Eastern Huasteca Nahuatl (nhe)  
7105 Michoacán Nahuatl (ncl)  
7109 El Nayar Cora (crn)  
7111 Huichol (hch)  
7115 Central Tarahumara (tar)  
7120 Mayo (mfy)  
7123 Yaqui (yaq)

*Central and South American languages (7100-7999)*

7125 Matagalpa (mtn)  
7126 Mayangna (yan)  
7127 Mískito (miq)

*Mayan languages (7130-7181)*

7130 Huastec (hus)  
7135 Chol (ctu)  
7136 Chortí (caa)  
7137 Tzeltal (tzh)  
7138 Tzotzil (tzo)  
7143 Aguacateco (agu)  
7144 Ixil (ixl)  
7150 Mam (mam)  
7152 Tektiteko (ttc)  
7155 Kaqchikel (cak)  
7156 Tz'utujil  
7160 K'iche' (quc)  
7161 Kekchí (kek)  
7162 Poqomam (poc)  
7163 Poqomchi' (poh)  
7166 Chuj (cac)  
7170 Popti' (jac)  
7171 Q'anjob'al (kjb)  
7172 Western Kanjobal (knj)  
7175 Itzá (itz)  
7177 Mopán Maya (mop)  
7179 Lacandon (lac)  
7180 Yucateco (yua)

7182 Purepecha (tsz)  
 7185 Huilliche (huh)  
 7186 Mapudungun (arn)  
 7188 Highland Totonac (tos)

*Otomanguean languages (7200-7399)*

7200 Guerrero Amuzgo (amu)  
 7210 Copala Triqui (trc)  
 7220 Alacatlazala Mixtec (mim)  
 7230 Mixtepec Mixtec (mix)  
 7240 Silacayoapan Mixtec (mks)  
 7250 Mixtec N.E.C.  
 7260 Tepeuxila Cuicatec (cux)  
 7270 Huautla Mazatec (mau)  
 7280 Ixcatec (ixc)  
 7290 San Juan Atzingo Popoloca (poe)  
 7300 Zapotec (zap)  
 7310 Western Tlacolula Valley Zapotec (twb)  
 7320 Zoogocho Zapotec (zpq)  
 7330 Central Mazahua (maz)  
 7340 Mezquital Otomi (ote)  
 7350 Ojitlán Chinantec (chj)

7400 Quechua (que)  
 7500 Aymara (aym)  
 7501 Central Aymara (ayr)  
 7505 Galibi Carib (car)  
 7515 Wayana (way)  
 7525 Waiwai (waw)  
 7535 Guahibo (guh)  
 7540 Asháninka (cni)  
 7550 Arawak (arw)  
 7555 Garifuna (cab)  
 7560 Taino (tnq)  
 7565 Wayuu (guc)  
 7575 Wapishana (wap)  
 7585 Yucuna (ycn)  
 7600 Northern Emberá (emp)  
 7635 Boruca (brn)  
 7640 Ngäbere (gym)  
 7645 Arhuaco (arh)  
 7648 Cogui (kog)  
 7650 San Blas Kuna (cuk)  
 7655 Cofán (con)  
 7660 Paumarí (pad)  
 7665 Mondé (mnd)  
 7670 Tuparí (tpr)  
 7680 Guarani (grn)  
 7682 Paraguayan Guaraní (gug)  
 7690 Sirionó (srq)  
 7700 Xingú Asuriní (asn)  
 7710 Cocama-Cocamilla (cod)  
 7715 Nhengatu (yrl)  
 7735 Tehuelche (teh)  
 7800 Argentina N.E.C.  
 7810 Guatemala N.E.C.

*Other and unspecified languages (8000-9999)*

8000 Basque (eus)  
 8010 Esperanto (epo)  
 8020 Shelta (sth)  
 8030 Latin (lat)  
 8050 American Indian N.E.C.  
 8055 Caribbean N.E.C.  
 8060 Eastern Europe N.E.C.  
 8061 Europe N.E.C.  
 8089 Specified not listed  
 9999 Unspecified



## How to Work with a Telephone Interpreter

Telephone interpreters may receive several calls a day—each one requiring special attention in a specific field. When working with an interpreter over-the-phone, there are a few things you should keep in mind to ensure your call is handled quickly and successfully.

### Your role

- Always speak in first person, just as you would in normal conversation. For example, say, “Do you have a fever?” rather than “Ask her if she has a fever, please.”
- Immediately introduce yourself to the limited-English proficient (LEP) client and explain your reason for calling.
- Telephone interpretation is “consecutive” interpretation. That means you will experience pauses when the interpreter repeats each statement in the respective language.
- After you speak one-two sentences or finish a thought, pause to give the interpreter enough time to interpret.
- Be prepared to explain some things in more detail for the telephone interpreter. Some terminology and concepts may not have an equivalent in the target language.
- Control the conversation. The telephone interpreter is only there to interpret. You are responsible for making sure the LEP client receives the same service as an English-speaking client.
- Ask the interpreter and the LEP client questions to ensure they understand what you want to communicate.
- Avoid asking the interpreter for his/her opinion about the situation being interpreted.
- We can accommodate three-way telephone interpretation calls. Tell the call center agent the name and phone number of the third party, and they will arrange the call for you. The interpreter cannot facilitate this for you. You must ask the call center agent at the beginning of the call.
- Follow up by providing us with feedback about your interpretation services.

### Your telephone interpreter’s role

We expect our interpreters to meet high standards and want to know when they are meeting our expectations. To that end, your feedback is critical.


- Make sure your interpreter introduces himself/herself using a first name and ID number. They are not required to provide a last name.
- Your interpreter should not have a side conversation with you or the client. He or she must relay everything that is said back to you or your client. This includes any advice that the client may ask of the interpreter.
- Your interpreter should not discuss anything unrelated to the telephone interpretation assignment.



# Language Identification Card

As a Language Line Services customer you have access to over-the-phone interpretation 24 hours a day, 7 days a week. Use this Language Identification Card in a face-to-face situation, to determine which language a person speaks. The Language ID Card lists the languages most frequently encountered in North America, grouped by the geographical region where they are commonly spoken.

- To use the Language ID Card efficiently, locate the geographical region where you believe the limited English speaker may be from. (Pacific Islands, Europe, etc.)
- Show the person the languages listed for that region. The message underneath each language says: “Point to your language. An Interpreter will be called. The interpreter is provided at no cost to you.”


Example:	
<b>English</b>	English 
Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.	


- Refer to your Quick Reference Guide (QRG) to access an interpreter through Language Line Services. In most cases, an interpreter is available within seconds.
- If you are unable to identify the language, our representative will help you.


*Please note: Language Line Services interprets from English into more than 150 languages. Only the most requested languages are listed here. This list is subject to change based upon customer demand.*


From North America call **1 800 752-6096**, option 1 for more information about our service.


<b>Europe</b>	
<b>Albanian</b>	Shqip 
Tregoni me gisht gjuhën tuaj. Do të thërrasim një përkthyes. Përkthyesi do të merret falas për ju.	
<b>Armenian</b>	Հայերեն 
Ցոյց տուեք ո՞ր սէլ լեզուն կը խօսիք՝ Թարգմանիչ մը կանչել կը տանք. Թարգմանիչը կը տրամադրուի անվճար.	
<b>Basque</b>	Euskara 
Euskara seinalatu. Jarraian itzultzaile bati deituko diogu. Itzultzaileak doako zerbitzua eskeiniko dizu.	
<b>Bosnian</b>	Bosanski 
Pokažite svoj jezik. Prevodilac će biti pozvan. Prevodilac je obezbijeden bez troškova za vas.	
<b>Bulgarian</b>	Български 
Посочете вашият език.Ще бъде извикан преводач Преводачът е осигурен безплатно за вас.	
<b>Croatian</b>	Hrvatski 
Pokažite svoj jezik. Prevoditelj će biti pozvan. Prevoditelj je obezbijeden bez troškova po vas.	
<b>Czech</b>	Čeština 
Ukažte na váš jazyk. Bude zavolán tlumočník. Tlumočení je pro vás bezplatné.	
<b>Danish</b>	Dansk 
Peg på dit sprog. En tolk vil blive tilkaldt. Tolken tilbydes uden omkostninger for dig.	
<b>Dutch</b>	Nederlands 
Wijs uw taal aan. Wij zullen u een tolk geven. De service van de tolk is geheel gratis.	
<b>Estonian</b>	Eesti keel 
Osutage oma keelel. Vastava tõlgiga võetakse ühendust. Tõlgi teenused on teie jaoks tasuta.	
<b>Finnish</b>	Suomi 
Osoita maasi kieltä. Kutsumme tulkin paikalle. Tulkin käyttö on sinulle ilmaista.	
<b>French</b>	Français 
Pointez vers votre langue et on appellera un interprète qui vous sera fourni gratuitement.	
<b>German</b>	Deutsch 
Zeigen Sie auf Ihre Sprache. Ein Dolmetscher wird gerufen. Der Dolmetscher ist für Sie kostenlos.	
<b>Greek</b>	Ελληνικά 
Δείξτε τη γλώσσα σας και θα καλέσουμε ένα διερμηνέα. Ο διερμηνέας σας παρέχεται δωρεάν.	
<b>Hungarian</b>	Magyar 
Mutasson rá erre a nyelvre. Tolmácsot fogunk hívni. A tolmaés az Ön számára díjtalan.	


**Icelandic** Íslenska   
Bentu á þitt tungumál. Það verður hringt í túlk. Túlkurinn er þér að kostnaðarlausu.


**Italian** Italiano   
Puntare sulla propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.


**Lithuanian** Lietuvių   
Nurodykite savo kalbą. Bus pakviestas vertėjas. Vertėjas jums bus suteiktas nemokamai.


**Macedonian** Македонски   
Покажете на јазикот на кој зборувате. Ке повикаме преведувач. Услугите на преведувачот се бесплатни.


**Norwegian** Norsk   
Pek på ditt språk. Vi tilkaller en tolk. Tolken arbeider uten at det koster deg noe.


**Polish** Polski   
Proszę wskazać swój język i wezwiami tłumacza. Tłumacza zapewnimy bezpłatnie.


**Portuguese** Português   
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.


**Romanian** Română   
Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret care vă este asigurat gratuit.


**Russian** Русский   
Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.


**Serbian** Српски   
Покажите свој језик. Преводалац ће бити позван. Преводалац је обезбеђен без трошкова за вас.

**Slovak** Slovenčina   
Ukážte na vašu reč. Zavoláme tlmočníka. Tlmočenie je pre vás bezplatné.


**Spanish** Español   
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.


**Swedish** Svenska   
Peka på ditt språk. En tolk kommer att tillkallas. Tolken erbjuds utan kostnad för dig.


**Ukrainian** Українська   
Вкажіть вашу мову. Вам викличуть перекладача. Послуги перекладача надаються безкоштовно.


**Yiddish** אידיש   
ווייזט אן אויף אייער שפראך און מ'זועט רופן א דאלמעטשער. דער דאלמעטשער ווערט צוגעשטעלט אויסט, עס וועט אייך גארנישט קאסטן.

**Pacific Islands**


**Fijian** Vosa Vakaviti   
Dusia na nomu vosa . Ni na vakarautaki mai e dua na dau vakadewa vosa. Na dau vakadewa vosa e sega ni saumi.


**Ilocano** Ilokano   
Itudo yo ti sao yo. Maawagan ti maysa nga mangipatpatarus. Iti mangipatpatarus ket tumulong kadakayo nga saan yo a bayadan.


**Indonesian** Bahasa Indonesia   
Tunjukkan bahasa Anda. Jurubahasa akan diadakan. Jurubahasa diadakan tanpa Anda dibebani biaya.

**Malay** Bahasa Melayu   
Tunjukkan bahasa anda. Jurubahasa akan dihubungi. Jurubahasa akan disediakan tanpa anda dikenakan bayaran.


**Marshallese** Kajin Majöl   
Kwalok Kajiñ Eo Am. Im Renaj Kir Ri-ukokok Eo. R-ukok Eo Enaj Ejelok Wönen Ilo An Jibañ Eok.


**Samoan** Fa'asamoa   
Fa'asino lau gagana. O le a vala'au se fa'amatala'upu. Ua saunia se fa'amatala'upu e aunoa ma se tau e te totoiina.


**Tagalog** Tagalog   
Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.


**Tongan** Lea Faka-Tonga   
Tuhu'i mai ho'o lea fakafonua. 'E ui ha fakatonulea. 'Oki ta'etotongi kia koe 'a e fakatonulea.

## North America, South America, and Caribbean

**French** Français   
Pointez vers votre langue et on appellera un interprète qui vous sera fourni gratuitement.

**Haitian Creole** Kreyòl   
Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

**Portuguese** Português   
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

**Spanish** Español   
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

