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INTRODUCTION

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 and contractors/consultants, and to ensuring that the public-at-large is 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 grounds of race, color, national origin, income, sex, age, disability, or limited English proficiency.

Approval of Title VI Plan

A draft of the MaineDOT FHWA Title VI plan is reviewed, revised if necessary and approved by the Commissioner and Senior Management. The Civil Rights Office provides this team with a draft plan and consults with the Commissioner and senior management on aspects and requirements of the Title VI Plan. Once the Plan is approved by the Commissioner and senior management, it is sent to FHWA Division Office for approval.

Any changes that are required by FHWA in that review process will be made and the Commissioner will review and approve those changes.
TITLE VI/NONDISCRIMINATION POLICY STATEMENT

The Commissioner of the Maine Department of Transportation (MaineDOT) is ultimately responsible for and committed to the effective implementation of the Title VI Program to achieve compliance with Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all Federal programs and activities. Understanding that the Commissioner will not be performing any day-to-day implementation duties, the MaineDOT conducts its Title VI/Environmental Justice Program in a team approach by involving personnel from all program areas, with guidance from the Title VI Coordinator. Responsibility for the day to day administration of the Program will be delegated to the Title VI Program Coordinator who is currently the Director of the Civil Rights Office. The Title VI Program Coordinator has been delegated sufficient authority and responsibility to effectively carry out her duties.

The Title VI Program Coordinator ensures MaineDOT’s compliance with Title VI/Environmental Justice implementing regulations. Bureau Directors are responsible for Program implementation in their Bureaus and shall identify and delegate Title VI/Nondiscrimination Federal Program Area Liaisons to perform the routine data collection/data analysis and process reviews.

Inquiries concerning the MaineDOT’s policies, investigations, complaints, compliance with applicable laws, regulations, and concerns regarding compliance with Title VI/Environmental Justice may be directed to:

Maine Department of Transportation
# 16 State House Station
Augusta, Maine 04333-1116
Telephone (207) 624-3056 | TTY users Dial Relay: 711
amy.hughes@maine.gov

MaineDOT 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 all of our programs and services whether those programs and activities are federally funded or not.

This Policy Statement will be circulated throughout the MaineDOT, made available to the public, and be included by reference in all contracts, agreements, programs and services administered by the Department of Transportation.

David Bernhardt, Commissioner

Date: 9/13/17
FEDERAL HIGHWAY ADMINISTRATION CIVIL RIGHTS ASSURANCE

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

1. No person on the basis of race, color, national origin, sex, age or disability will be subjected to discrimination in the level and quality of transportation services and transportation-related benefits.

2. The Maine Department of Transportation will compile, maintain, and submit in a timely manner Title VI information required 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, national origin, sex, age or disability as it relates to the provision of transportation services and transportation-related benefits may file a complaint with the Federal Highway 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.

[Signature]

DATE: 9/13/17

David Bernhardt, P.E., Commissioner
Maine Department of Transportation
The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination Assurances

DOT Order No. 1050.2A

The Maine Department of Transportation (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Federal Highway Administration (FHWA), 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), (prohibits discrimination on the basis of 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 ensure 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 FHWA."

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 nondiscrimination 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 Highway Program:

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 (with regard to 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-Aid Highway Program activities 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 ensure 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 B 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 C 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 with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, 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 FHWA 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 FHWA and USDOT. You must keep records, reports, and submit the material for review upon request to FHWA 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.

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 Aid Highway Program. This ASSURANCE is binding on Maine, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Maine Department of Transportation

by

David Bernhardt, Commissioner

DATED 9/20/17
APPENDIX A

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, FHWA, 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 FHWA 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 FHWA, 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 FHWA 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 FHWA 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 23 U.S. Code § 107, the Regulations for the Administration of the Federal Aid Highway Program, and the policies and procedures prescribed by the FHWA 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 the Maine Department of Transportation and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as fellows, 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, 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, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, 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 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, 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, Maine Department of Transportation will there upon revert to and vest in and become the absolute property of Maine Department of Transportation and its assign.*

(*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. § 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);
- 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 100-203), (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).
III. ORGANIZATION AND STAFFING FOR TITLE VI/NONDISCRIMINATION PROGRAM

[Diagram of organizational structure with roles and names]

Commissioner
David Bemhardt, P.E.

Deputy Commissioner
Jonathan Nass, Esq.

Freight & Business Services
Nate Moulton

Creative Services
Meg Lane

Bureau of Finance & Administration
Karen Doyle, CGFM

Bureau of Planning
Herb Thomson

Bureau of Project Development
William Pulver, P.E.

Chief Engineer
Joyce Taylor, P.E.

Employee Development
Rhonda Petter, P.E.

Human Resources
Becky Greene

Environmental
Judy Gales

Results & Information
Andy Blackmore, P.E.

Transportation Research
Dale Peabody, P.E.

Legislative and Constituent Services
Meghan Russo

Bureau of Maintenance & Operations
Dale Doughty, C.G.
Description of Title VI Program Responsibilities within the MaineDOT

The Commissioner of MaineDOT is responsible for ensuring the implementation of the MaineDOT’s Title VI/EJ Programs. The Civil Rights Director, on behalf of the Commissioner, is responsible for the overall management of the Title VI/EJ Programs. The day-to-day administration of the program lies with the Civil Rights Director who will serve as the Title VI/EJ Coordinator, under the supervision of the Chief Legal Counsel. The Title VI/EJ Coordinator has, at all times, direct access to the Commissioner. The Civil Rights Director shall have lead responsibility for coordinating the administration and implementation of the Title VI/Environmental Justice Programs and related statutes program, plan, and assurances. The Civil Rights Director delegates some Title VI duties to the Title VI Liaisons in program areas. The Liaisons will work with the Title VI/EJ Coordinator to administer the program in their areas.

CIVIL RIGHTS TITLE VI OFFICE STAFF

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director, Civil Rights Office</td>
<td>Amy Hughes</td>
<td>207-624-3056</td>
<td><a href="mailto:amy.hughes@maine.gov">amy.hughes@maine.gov</a></td>
</tr>
<tr>
<td>Title VI Coordinator</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>EEO Officer</td>
<td>Sherry Tompkins</td>
<td>207-624-3066</td>
<td><a href="mailto:Sherry.tompkins@maine.gov">Sherry.tompkins@maine.gov</a></td>
</tr>
<tr>
<td>DBE Program Administration, Labor Compliance</td>
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<tr>
<td>EEO Officer</td>
<td>Gigi Ottmann-Deeves</td>
<td>207-624-3036</td>
<td><a href="mailto:Gigi.ottomann-deeves@maine.gov">Gigi.ottomann-deeves@maine.gov</a></td>
</tr>
<tr>
<td>Title VI Specialist EEO, OJT Administration, Labor Compliance</td>
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</tr>
<tr>
<td>ADA Officer</td>
<td>Theresa Savoy</td>
<td>207-624-3042</td>
<td><a href="mailto:Theresa.savoy@maine.gov">Theresa.savoy@maine.gov</a></td>
</tr>
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Duties of Civil Rights Office:

Authorities for nondiscrimination include but are not limited to:


IV. PROGRAM AREA MONITORING AND REVIEW PROCESS

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

Provide training to MaineDOT staff and subrecipients on Title VI/EJ.

Prepare and submit the MaineDOT’s Title VI/EJ Implementation Plan to the FHWA by October 1 each year.

Develop Title VI/EJ information for dissemination (where necessary, in other language(s), format(s)).

Prepare and submit the MaineDOT’s FFY Work Plan and Accomplishments Report to the FHWA by October 1 each year.

Establish procedures to promptly investigate complaints, to identify and eliminate discrimination, to review programs and grant applications, to resolve deficiencies within 90 days, and to collect and analyze statistical data.

Develop a program to conduct Title VI/EJ reviews of program areas and conduct reviews of programs – with program personnel.

The MaineDOT will provide Title VI Program brochures (Appendix B) at public meetings and presentations where the public is present. The approved Title VI Implementation Plan, Title VI Assurances, Complaint Form and Complaint Process will be posted on the MaineDOT Civil Rights website.

Reviews of Program Areas

In federal fiscal year 2017, MaineDOT will work with the FHWA Division Office to develop processes and procedure for reviewing program areas.

Further information on MaineDOT subrecipients may be accessed by contacting the Civil Rights Office at 207-624-3056.

Title VI/EJ Liaisons in Programs

In addition to the Title VI/EJ Specialist, each of the program areas shall have a designated Title VI/EJ liaison. The program areas are:

- Bureau of Transportation Systems Planning: Statewide Planning and Statewide Multimodal Planning Division
- Bureau of Project Development: Urban and Arterial Highway Program, Urban and Federal Bridge Program,
- Multimodal Program
- Property Office
- Bureau of Maintenance and Operations
- The Civil Rights Office.

The Liaisons shall be responsible for ensuring Title VI program development in their areas, sharing Title VI information and resources, ensuring compliance of their subrecipients, Title VI program monitoring, and reporting to the Civil Rights Office the results and goals of their respective programs. Each program area is responsible for performing a self-assessment to determine which personnel interact with members of the public.
**Data Collection and Reporting**

Program area reports will be required for each of the program areas. The Title VI/EJ Liaisons will be responsible for coordination and compilation of these reports into an annual report submitted by September 15 each year to the Director of the Civil Rights Office. These reports will include statistical data regarding race, color, national origin, English language ability and sex of participants in, and beneficiaries of MaineDOT programs; e.g., relocatees, impacted citizens, transport users, and affected communities. The report shall specifically review Title VI/EJ accomplishments achieved during the year by the program area including training given by or taken by the MaineDOT employees, dissemination of public information, complaints, and reviews as well as any other related activity.

**Title VI Liaisons**

The current assignments for Title VI Liaisons are:

<table>
<thead>
<tr>
<th>Program Area</th>
<th>Details</th>
<th>Title VI Liaison</th>
<th>Phone# / e-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Civil Rights Office</td>
<td>DBE</td>
<td>Amy Hughes, Director</td>
<td>207-624-3056 <a href="mailto:Amy.hughes@maine.gov">Amy.hughes@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td>ADA</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OJT</td>
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<tr>
<td></td>
<td>Contract Compliance</td>
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</tr>
<tr>
<td></td>
<td>Title VI/EJ</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Labor Compliance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bureau of Planning</td>
<td>Statewide Planning,</td>
<td>Scott Rollins, Deputy Director</td>
<td>207-624-3557 <a href="mailto:Scott.rollins@maine.gov">Scott.rollins@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td>MPO,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>EIS/EA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bureau of Project Development</td>
<td>Highway, Bridge</td>
<td>Richard Crawford, Assistant</td>
<td>207-624-3437 <a href="mailto:Richard.Crawford@maine.gov">Richard.Crawford@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Director</td>
<td></td>
</tr>
<tr>
<td>Multimodal Program</td>
<td>Locally Administered</td>
<td>Jeff Tweedie, Program Manager</td>
<td>207-624-3427 <a href="mailto:Jeff.Tweedie@maine.gov">Jeff.Tweedie@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td>Projects</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property Office</td>
<td>Acquisitions, condemnation</td>
<td>Todd Pelletier, Director</td>
<td>207-624-3551 <a href="mailto:Todd.pelletier@maine.gov">Todd.pelletier@maine.gov</a></td>
</tr>
<tr>
<td>Maintenance and Operations</td>
<td>Maintenance, Traffic</td>
<td>Dale Doughty, Director</td>
<td>207-624-3600 <a href="mailto:Dale.doughty@maine.gov">Dale.doughty@maine.gov</a></td>
</tr>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
**Title VI/EJ Responsibilities**

**Bureau of Planning:**

This Bureau develops the State’s Annual Work Plan and the Statewide Transportation Improvement Program (STIP) and the Public Involvement Plan to meet present and future needs for safe, adequate, and efficient transportation and include all stakeholders and users in that process. The Regional Planning Committees and the Metropolitan Planning Organizations (MPO’s) provide information in developing these planning documents. This Bureau also encompasses clean air issues, safety, bridge and pavement management, transportation analysis, transportation reporting, inventory, research, mapping, major project studies and training and technical assistance for communities.

The Bureau of Planning is responsible for National Environmental Policy Act (NEPA) assessments and assuring that Environmental Justice processes are complete and documented.

Designate a Title VI/EJ liaison that will:

- Ensure that all aspects of the planning process operation, including environmental impact reviews, comply with Title VI/EJ.
- Assure that Environmental Justice processes are complete and documented when NEPA impact studies are done.
- 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 affected population, 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 training and information to planning staff, MPO’s, and Regional Planning Organizations regarding Title VI/Environmental Justice.
- Provide statistical data on race, color, national origin, income and sex of populations/population groups in all areas impacted by programs or services.
- Ensure equal opportunity for participation on Regional Planning Committees.
- Ensure Title VI/EJ language is included in every Bureau of Planning subrecipient contract.
- Perform reviews annually of MPO’s and of other Bureau subrecipients to ensure Title VI/EJ adherence.
- Provide the Title VI/EJ Coordinator with an annual report of Title VI/EJ accomplishments for the previous year and goals for the next year, and results of Title VI/EJ reviews. Report is due to the Civil Rights Office by September 1st of each year.

**Bureau of Project Development**

The Bureau of Project Development assumes complete multiple phases of construction projects, including: advertising for bids, conducting public hearings, obtaining legal title to property, and supervising construction. Program areas within the Bureau of Project Development for purposes of Liaison responsibilities are: Project Development (Highway, Bridge and Contracts), Multimodal Office and Property Office.
Designate Title VI/EJ liaisons that will:

- Monitor all Project Development activities to ensure nondiscrimination within program areas.
- Provide the Title VI/EJ Coordinator with an annual report on Title VI/EJ accomplishments for the previous year and goals for the next year. Report is due to the Civil Rights Office by September 15 each year.
- Perform reviews as needed of Bureau of Project Development subrecipients to ensure Title VI/EJ adherence.
- Provide statistical data on race, color, national origin, income and sex of populations/population groups in all areas impacted by programs or services.
- Ensure Title VI/EJ language is included in every Bureau of Project Development program area subrecipient contract and subcontract.
- Serve as a resource person for Program area, helping to ensure participation of a cross section of people representative of the affected population, including various and diverse social, economic, and ethnic interest groups, are represented in the project development process.
- Provide training and information to program area staff regarding Title VI/EJ.

**Multimodal**

Designate Title VI/EJ liaison that will:

- Ensure that all subrecipients have included in their agreements
  
  1. Title VI Assurances
  2. A designated Title VI Coordinator responsible for Title VI compliance
  3. Appendix A and E in any contracts

- Develop and implement a plan for subrecipient compliance reviews by
  
  1. Annually develop a list of subrecipients
  2. Identifying high-risk, medium and low risk Local Public Agencies (LPA)
  3. From that list choose a representative sampling for review
  4. Determine type of review (Desk or On-site)
  5. With Title VI Specialist, review LPA and issue findings and corrective action plan for LPA.

- Ensure that all MaineDOT public meetings and notices for LPA projects comply with Title VI;
- Address any complaints received with Title VI Specialist; and
- Report annually by September 15 to Title VI Coordinator findings, complaints and accomplishments.
Bureau of Maintenance and Operations

Designate Title VI/EJ liaison that will:

- Monitor all M&O activities to ensure nondiscrimination within program areas.
- Provide the Title VI/EJ Coordinator with an annual report on Title VI/EJ accomplishments for the previous year and goals for the next year. Report is due to the Civil Rights Office by September 15 each year.
- Review statistical data on race, color, national origin, income and sex of populations/population groups in all areas impacted by programs or services. Ensure Title VI/EJ language is included in every M&O program area subrecipient contract and subcontract.
- Serve as a resource person for Program area, helping to ensure participation of a cross section of people representative of the affected population, including various and diverse social, economic, and ethnic interest groups, are represented in the project development process.
- Provide training and information to program area staff regarding Title VI/EJ.

Civil Rights Office

Coordinates external civil rights for FTA, FAA and FHWA subrecipients; wage issues; programs and policies in the areas of Nondiscrimination, Affirmative Action, and Equal Opportunity, Title VI/EJ Responsibilities:

- Ensure Title VI/EJ language is included in every Civil Rights Office subrecipient contract and subcontract.
- Perform reviews annually of Civil Rights Office subrecipients to ensure Title VI/EJ adherence. (see Subrecipient Review Process)
- Perform Title VI reviews with liaisons in program areas.
- Provide training and technical assistance to Title VI liaisons, subrecipients.
- Compile and forward all Title VI/EJ reports to FHWA by October 1st each year.
- Maintains the Title VI Plan and ensures Title VI and EEO are implemented fully in Department external programs.

The Civil Rights Office reviews the nondiscrimination policies of each contractor and applicant as part of the prequalification process for selection. This process happens each year, with some firms being qualified for up to three years. The policies are reviewed again at recertification periods and during any compliant investigation or a scheduled EEO Contractor Compliance Review. The efforts to prevent discrimination must address, but not be limited to:

- a program's impacts;
- access;
- benefits;
- participation;
- treatment;
- services;
• contracting opportunities;
• training opportunities;
• investigations of complaints;
• allocations of funds;
• prioritization of projects, and the functions of right-of-way, research, planning, and design.

V. SPECIAL EMPHASIS PROGRAM AREAS

Special Emphasis Program areas are internal programs in which MaineDOT has identified a trend or pattern of discrimination. The Title VI/EJ Coordinator will use various factors to make the special emphasis determination, those factors will include:

1. Deficiencies or observations made during the most recent process review;
2. Questions or concerns in regard to complaints and history of deficiencies in a particular program area;
3. Observations during the review of the program areas’ annual report;
4. An increase of risk within the program, given new processes and areas of focus that may impact populations defined in Title VI;
5. New staff assigned to Title VI in a specific program area.

If a program area is found to have deficiencies, the Title VI/EJ Coordinator will provide the technical assistance and guidance needed to aid the Title VI Liaison with the development of a Corrective Action Plan which will be implemented within 90 days of the determination.

MaineDOT has not found discrimination risk in any of its Program Areas at this time and therefore does not have any Special Emphasis Program Areas at the time of this submittal.

VI. SUBRECIPIENT REVIEW PROCEDURES

MaineDOT will update its list of subrecipients annually. These will include Municipal Planning Organizations (MPOs), municipalities, Regional Planning Organizations and State Colleges and Universities that received federal funding. MaineDOT has developed a review process for these subrecipients.

MaineDOT will review one of the four MPOs each year to determine if their program is in compliance. At the time of review MaineDOT will first ask the MPO to provide documentation and answer questions to be submitted to the MaineDOT by a date certain. Once information is received the Department will perform a desk audit on that agency.

Further, MPOs must:

• Submit an updated Title VI Implementation Plan for the upcoming FFY no later than each October 1.
• Submit a Title VI Work plan and Accomplishments Report covering the previous FFY activities and the activities planned for the upcoming FFY no later than October 1 each year.
• Appoint a Title VI/Nondiscrimination Coordinator;
• Provide signed the standard *FHWA Assurances for Title VI and Other Nondiscrimination Statutes and Regulations* document.
• New Subrecipients’ CEOs should re-sign and re-submit the standard *FHWA Assurances for Title VI and Other Nondiscrimination Statutes and Regulations* document to the STA within 30 days of accession and incumbent CEOs should re-sign and re-submit the standard *FHWA Assurances for Title VI and Other Nondiscrimination Statutes and Regulations* document every three years.
• The Subrecipient is responsible for including the Title VI/Nondiscrimination Assurance Paragraph in all solicitations for Bid/Requests For Proposals, the Title VI/Nondiscrimination Assurance Insert in all prime contracts and the prime contractor insert into all subcontracts regardless of tier (Appendix A of the document), and the FHWA-funded Project Agreement paragraph.

Locally administered project review will be determined by the Multimodal Liaison in coordination with the Title VI coordinator and will Develop and implement a plan for subrecipient compliance reviews by:

- Annually developing a list of subrecipients
- Identifying high-risk, medium and low risk LPAs
- From that list choose a representative sampling for review
- Determine type of review (Desk or On-site)
- With Title VI Specialist, review LPA and issue findings and corrective action plan for LPA.

Further information on MaineDOT subrecipients may be accessed by contacting the Civil Rights Office at 207-624-3056.

MaineDOT’s CRO conducts compliance reviews of subrecipients to:
1. Ensure compliance with Title VI
2. Provide technical assistance in the implementation of the Title VI program
3. Correct deficiencies, when found to exist

**Notification**
The CRO 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 CRO.

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

**Desk Audit**
The CRO Title VI Specialist will review the documents and information submitted by the subrecipient during a desk audit. The CRO Title VI Specialist 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 will be necessary. If an on-site review is necessary, the subrecipient will be notified.

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
CRO 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 uses 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 look at if and how any diverse populations were identified and how these populations were notified. This will mean a review of the agency’s data collection process and knowledge of Title VI populations that may be impacted.

The Civil Rights Office will inform the Commissioner and FHWA of all findings in the Annual Goals and Accomplishment Report.

VII. DATA COLLECTION/REPORTING AND ANALYSIS

MaineDOT has gathered a demographic profile of the State of Maine that includes identification of the locations of minority populations in the aggregate and develops demographic maps that overlay the percent minority and non-minority, non-native and low-income populations as identified by the U.S. Census or the most relevant American Community Survey Data. We have compiled that information by county below. MaineDOT’s most recent data assessment was done in 2014. MaineDOT will update this information as it becomes available.

In federal fiscal year 2018, Maine DOT will be expanding its process for gathering, analyzing and implementing Title VI related data in its Program areas.

Demographic Profile of Minorities, Non-American National Origin and Low-Income by County.

Based on the 2016 U.S. Census data, Maine has a small minority population that is geographically spread across the state with concentrations in the urbanized areas served by direct recipient transit systems. The summary table below shows white and non-white populations for each of the counties. Non-white populations include Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Some Other
Race. Maine as a whole has an estimated minority population of 5.2%. Approximately 67% of Maine’s minority population lives in four counties:

- Androscoggin County: 8,157 people, of whom approximately 88% live in Auburn and Lewiston.
- Cumberland County: 22,196 people, of whom approximately 76% live in Portland, Westbrook, South Portland and Scarborough, all of which are served by direct-recipient transit systems (Metro and South Portland Bus Service).
- Penobscot County: 7,591, of whom approximately 62% live in Bangor, Brewer, Old Town, Orono, Veazie and Hampden, all of which are served by a direct-recipient transit system, Community Connector.
- York County: 8,297 people, of whom approximately 35%, live in Biddeford, Saco and Old Orchard Beach, all of which are served by a direct-recipient transit system, ShuttleBus.

Outside of these more densely populated areas, Washington County is the only other county that exceeds the 5% threshold in its county, with an 8.5% minority population comprised primarily of the Native American Passamaquoddy Tribe, and some Penobscot and Maliseet presence. Census tract data shows that there are also concentrations of the Houlton Band of Maliseet Indians in Aroostook County. The Penobscot Nation is located in Penobscot County.

### State of Maine Race Demographics by State/County

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population</th>
<th>White #</th>
<th>Minority #</th>
<th>Minority %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maine</td>
<td>1,331,479</td>
<td>1,284,243</td>
<td>69,236</td>
<td>5.2</td>
</tr>
<tr>
<td>Androscoggin</td>
<td>107,319</td>
<td>99,162</td>
<td>8,157</td>
<td>7.6</td>
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<tr>
<td>Aroostook</td>
<td>67,959</td>
<td>64,696</td>
<td>3,263</td>
<td>4.8</td>
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<tr>
<td>Cumberland</td>
<td>292,041</td>
<td>269,845</td>
<td>22,196</td>
<td>7.6</td>
</tr>
<tr>
<td>Franklin</td>
<td>30,001</td>
<td>29,070</td>
<td>930</td>
<td>3.1</td>
</tr>
<tr>
<td>Hancock</td>
<td>54,419</td>
<td>52,296</td>
<td>2,123</td>
<td>3.9</td>
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<tr>
<td>Kennebec</td>
<td>120,569</td>
<td>115,866</td>
<td>4,703</td>
<td>3.9</td>
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<tr>
<td>Knox</td>
<td>39,744</td>
<td>38,432</td>
<td>1,312</td>
<td>3.3</td>
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<tr>
<td>Lincoln</td>
<td>34,216</td>
<td>32,984</td>
<td>1,232</td>
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<td>Oxford</td>
<td>57,217</td>
<td>55,271</td>
<td>1,946</td>
<td>3.4</td>
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<tr>
<td>Penobscot</td>
<td>151,806</td>
<td>144,215</td>
<td>7,591</td>
<td>5.0</td>
</tr>
<tr>
<td>Piscataquis</td>
<td>16,843</td>
<td>16,270</td>
<td>573</td>
<td>3.4</td>
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<tr>
<td>Sagadahoc</td>
<td>35,273</td>
<td>33,932</td>
<td>1,341</td>
<td>3.8</td>
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<tr>
<td>Somerset</td>
<td>50,915</td>
<td>49,183</td>
<td>1,732</td>
<td>3.4</td>
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<tr>
<td>Waldo</td>
<td>39,364</td>
<td>37,986</td>
<td>1,378</td>
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<tr>
<td>Washington</td>
<td>31,450</td>
<td>28,776</td>
<td>2,764</td>
<td>8.5</td>
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<tr>
<td>York</td>
<td>202,343</td>
<td>194,046</td>
<td>8,297</td>
<td>4.1</td>
</tr>
</tbody>
</table>

Source: ACS Population estimates July 1, 2016

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1 Numbers differ from other tables because they are based on an estimate.
The following Map identifies minority populations by county.
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 totals and the whole southern area has higher numbers than the rest of the state. The Saint John River Valley also has several towns in the upper categories. 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.

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population</th>
<th>Native Born #</th>
<th>Native Born %</th>
<th>Foreign Born #</th>
<th>Foreign Born %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maine</td>
<td>1,329,100</td>
<td>1,282,537</td>
<td>96.5%</td>
<td>46,563</td>
<td>3.5%</td>
</tr>
<tr>
<td>Androscoggin</td>
<td>107,393</td>
<td>104,319</td>
<td>97.1%</td>
<td>3,074</td>
<td>2.9%</td>
</tr>
<tr>
<td>Aroostook</td>
<td>70,005</td>
<td>66,787</td>
<td>95.4%</td>
<td>3,218</td>
<td>4.6%</td>
</tr>
<tr>
<td>Cumberland</td>
<td>286,119</td>
<td>268,673</td>
<td>93.9%</td>
<td>17,446</td>
<td>6.1%</td>
</tr>
<tr>
<td>Franklin</td>
<td>30,402</td>
<td>29,705</td>
<td>97.7%</td>
<td>697</td>
<td>2.3%</td>
</tr>
<tr>
<td>Hancock</td>
<td>54,658</td>
<td>53,045</td>
<td>97.0%</td>
<td>1,613</td>
<td>3.0%</td>
</tr>
<tr>
<td>Kennebec</td>
<td>121,112</td>
<td>118,194</td>
<td>97.6%</td>
<td>2,918</td>
<td>2.4%</td>
</tr>
<tr>
<td>Knox</td>
<td>39,723</td>
<td>38,599</td>
<td>97.2%</td>
<td>1,124</td>
<td>2.8%</td>
</tr>
<tr>
<td>Lincoln</td>
<td>34,156</td>
<td>33,105</td>
<td>96.9%</td>
<td>1,051</td>
<td>3.1%</td>
</tr>
<tr>
<td>Oxford</td>
<td>57,421</td>
<td>56,348</td>
<td>98.1%</td>
<td>1,073</td>
<td>1.9%</td>
</tr>
<tr>
<td>Penobscot</td>
<td>153,437</td>
<td>149,386</td>
<td>97.4%</td>
<td>4,051</td>
<td>2.6%</td>
</tr>
<tr>
<td>Piscataquis</td>
<td>17,156</td>
<td>16,890</td>
<td>98.4%</td>
<td>266</td>
<td>1.6%</td>
</tr>
<tr>
<td>Sagadahoc</td>
<td>35,092</td>
<td>34,254</td>
<td>97.6%</td>
<td>838</td>
<td>2.4%</td>
</tr>
<tr>
<td>Somerset</td>
<td>51,577</td>
<td>50,772</td>
<td>98.4%</td>
<td>805</td>
<td>1.6%</td>
</tr>
<tr>
<td>Waldo</td>
<td>38,976</td>
<td>38,013</td>
<td>97.5%</td>
<td>963</td>
<td>2.5%</td>
</tr>
<tr>
<td>Washington</td>
<td>32,191</td>
<td>31,071</td>
<td>96.5%</td>
<td>1,120</td>
<td>3.5%</td>
</tr>
<tr>
<td>York</td>
<td>199,682</td>
<td>193,376</td>
<td>96.8%</td>
<td>6,306</td>
<td>3.1%</td>
</tr>
</tbody>
</table>

The following Map identifies non-native populations by county.
Low Income
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 2011-2015 American Community Survey some 180,278 people are 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 13.9% of the population for whom it is possible to determine poverty status. In comparison, 5.2% of residents are minorities, and 3.5% of residents were not born in the United States. The highest concentration of low income people reside in Cumberland County with 32,339 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 and Androscoggin Counties 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, Piscataquis and Aroostook.

<table>
<thead>
<tr>
<th>County</th>
<th>Persons for Whom Poverty Status is Determined</th>
<th># Persons below Poverty Level</th>
<th>% Persons below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maine</td>
<td>1,293,513</td>
<td>180,278</td>
<td>13.9%</td>
</tr>
<tr>
<td>Androscoggin</td>
<td>104,094</td>
<td>16,332</td>
<td>15.7%</td>
</tr>
<tr>
<td>Aroostook</td>
<td>68,052</td>
<td>12,608</td>
<td>18.5%</td>
</tr>
<tr>
<td>Cumberland</td>
<td>278,195</td>
<td>32,339</td>
<td>11.6%</td>
</tr>
<tr>
<td>Franklin</td>
<td>29,227</td>
<td>4,318</td>
<td>14.8%</td>
</tr>
<tr>
<td>Hancock</td>
<td>53,186</td>
<td>7,196</td>
<td>13.5%</td>
</tr>
<tr>
<td>Kennebec</td>
<td>117,441</td>
<td>16,256</td>
<td>13.8%</td>
</tr>
<tr>
<td>Knox</td>
<td>38,531</td>
<td>4,304</td>
<td>11.2%</td>
</tr>
<tr>
<td>Lincoln</td>
<td>33,557</td>
<td>4,073</td>
<td>12.1%</td>
</tr>
<tr>
<td>Oxford</td>
<td>56,649</td>
<td>9,911</td>
<td>17.5%</td>
</tr>
<tr>
<td>Penobscot</td>
<td>146,534</td>
<td>24,933</td>
<td>17.0%</td>
</tr>
<tr>
<td>Piscataquis</td>
<td>16,834</td>
<td>3,520</td>
<td>20.9%</td>
</tr>
<tr>
<td>Sagadahoc</td>
<td>34,838</td>
<td>4,200</td>
<td>12.1%</td>
</tr>
<tr>
<td>Somerset</td>
<td>50,692</td>
<td>8,907</td>
<td>17.6%</td>
</tr>
<tr>
<td>Waldo</td>
<td>38,067</td>
<td>6,243</td>
<td>16.4%</td>
</tr>
<tr>
<td>Washington</td>
<td>31,177</td>
<td>5,946</td>
<td>19.1%</td>
</tr>
<tr>
<td>York</td>
<td>196,439</td>
<td>19,192</td>
<td>9.8%</td>
</tr>
</tbody>
</table>

Source: 2011-2015 American Community Survey, File S1701
The following Map identifies low-income populations by county.
VIII. TRAINING

Internal -- MaineDOT’s Title VI Program Coordinator will work with the MaineDOT Director of Employee Development to integrate Title VI Training in Employee Development standard requirements as a portion of the overall training requirements.

MaineDOT will require periodic Title VI Program training to include the following: Commissioner, Bureau/Division Directors, Federal Program Area Directors (including L21PA Unit Director), Title VI/Nondiscrimination Coordinator, and Title VI/Nondiscrimination Federal Program Area Liaisons. In addition, upon the promotion or reassignment of any of these positions, the Title VI/EJ Coordinator will request to meet with that individual to conduct training to familiarize the employee with the Title VI obligations relating to his/her areas as well as the best practices for carrying out those requirements. As appropriate, the Title VI/EJ Coordinator will schedule Title VI related training to address regulatory changes.

Additional training requests may be made directly to the Title VI/EJ Coordinator.

The Title VI Coordinator will meet with and update MaineDOT Management team at least once a year on any issue identified though annual reviews or updates in federal requirements or program changes.

The Title VI Coordinator will meet semi-annually with Title VI Liaisons as a group to have an open discussion of any program issues or concerns that they wish to bring forward or any issues identified in annual reviews or program changes.

The Title VI Coordinator will meet individually as needed with Title VI Liaisons to discuss progress and any concerns or ideas that the Liaison may generate.

External -- The MaineDOT will provide opportunities for training to any subrecipient. Any time MaineDOT, FHWA or any agency of the USDOT offers training sessions MaineDOT extends these training opportunities to our subrecipients. These include FHWA webinars and local training opportunities that may be provided as requested by the MaineDOT.

MaineDOT also provides an open invitation to subrecipients for Title VI training or to speak about changes and requirements and will make ourselves available to attend association meetings and other meetings to provide information, either formal or informal on Title VI/EJ requirements.

MaineDOT provides training on civil rights issues including Title VI bi-annually to municipalities and their consultant who receive funding for Locally Administered Projects (LAPs).
IX. COMPLAINT DISPOSITION AND INVESTIGATION PROCEDURES

Processing Procedures for Complaints for External Complaints of Discrimination

**Purpose:**
To describe the rights of complainants to file and the responsibilities of the MaineDOT to process, resolve and investigate external complaints of discrimination. These procedures do not preclude the responsible staff from attempting to resolve any verbal or non-written concerns or complaints that it is aware of.

**Definition:**
*Discrimination* -- An act (or action) whether intentional or unintentional, through which a person in the United States, based on race, color, sex, age, national origin, or disability has been subjected to unequal treatment under any program or activity receiving financial assistance from the FHWA under title 23 U.S.C.

**Persons Eligible to File:**
Any person who believes that he or she or any specific class of persons to be subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities, based upon race, color, sex, age, national origin, or disability may file a written complaint. The complaint may be filed by the individual or the individual’s representative.

**Time Limits for Filing:**
A complaint must be filed no later than 180 days\(^2\) after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

**Form of Complaints:**
1. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant’s name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age, income status), and the date of alleged act(s). Complaints shall explain as fully as possible the facts and circumstances surrounding the alleged discriminatory action, and identify the individual(s) and/or organization(s) responsible for the alleged discriminatory action.
2. In cases where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint. Signed allegations of discrimination received by facsimile or e-mail will be acknowledged and processed. Complaints received by telephone will be reduced to writing and provided to the complainant for confirmation, revision and signature before processing.
3. The MaineDOT Civil Rights Office will investigate complaints filed with the MaineDOT against its contractors, consultants, or other subrecipients.

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\(^2\) All days refer to calendar days.
directly with the MaineDOT against the MaineDOT shall be forwarded to the appropriate USDOT agency for investigation.

**Complaint Acceptance and Notifications:**

1. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the complainant, within ten days by registered mail with a read receipt request. At the same time, the complaint will be sent to the appropriate USDOT agency.

2. If a complaint is deemed incomplete, additional information will be requested, and the complainant will be provided sixty business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

3. Within fifteen business days from receipt of a complete complaint, the MaineDOT will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five business days of this decision, the Commissioner or his/her authorized designee will notify the complainant and respondent, by registered mail, informing them of the disposition.
   a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
   b. If the complaint is to be investigated, the notification shall state the grounds of the MaineDOT’s jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

4. When the MaineDOT does not have sufficient jurisdiction, the Commissioner or his/her authorized designee will refer the complaint to the appropriate State or USDOT agency holding such jurisdiction.

5. If the complaint has investigative merit, the Commissioner or his/her authorized designee will assign an investigator trained in compliance investigations.

**Investigation Procedure:**

The Investigation Procedure includes the following documents/actions:

- Investigative plan
- Investigative log
- Request for information
- Conducting interviews
- On-site visit
- Obtaining evidence
- Analyzing data
- Writing the investigative report
Investigative Plan
The Investigative Plan is a procedural document to provide a framework with which to conduct and complete the investigation. The Investigative Plan is an internal document for use by the Investigator to investigate the merit of the filed complaint. The following are the elements contained in the Investigative Plan:

- Investigative Log will be maintained which will document all activities related to the complaint
- Complainant(s) name and address
  - Attorney for complainant name, address and telephone
- Respondent(s) name and address
  - Attorney for respondent with name, address and telephone
- Applicable Law (i.e., Title VI, Title VIII, compliance review under regulations)
- Basis of the complaint
- Issue(s)
- Background summary of complaint
- Name of person(s) to be interviewed
  - Questions for the complainant
  - Questions for the respondent, and
  - Questions for the witness(es)
- Evidence to be obtained during the investigation

Request for Information
The investigator will contact the respondent to advise him/her of the complaint and determine the appropriate official(s) to whom the Request for Information (RFI) should be sent and eventually interviewed.

The investigator will prepare a cover letter to transmit the RFI. The cover letter will explain the investigative process and provide information regarding any meetings that have been scheduled. The investigator will modify the cover letter to satisfy the circumstances and provide the RFI to the respondent prior to conducting the on-site visit. This will facilitate the availability and review of the evidence during the on-site visit.

Conducting Interviews
The main objective of conducting interviews is to obtain information from witnesses that will either support or refute the allegations. Interviews will be conducted by telephone unless an on-site visit is required. A list of relevant questions will be prepared to address the issues raised in the complaint.

The complainant will be interviewed to gain a full understanding of the situation outlined in the discrimination complaint. Appropriate changes to the Investigative Plan will be made based upon any new information provided by the complainant.

The respondent will be interviewed to provide him/her an opportunity to respond to the allegations raised by the complainant as well as to provide the investigator the opportunity to understand the respondent’s operation or policies that complainant cites in the complaint. As the keeper of the records, the investigator will discuss the RFI with the respondent and explain the need for
requesting documentation. The respondent will be information that he/she has the right to submit a formal position statement addressing the complainant’s allegations. Only witnesses who have information relevant to the allegations raised in the complaint of discrimination will be interviewed. The investigator will determine whether the testimony to be provided is relevant and when sufficient interviews have been conducted in order to make a finding.

On-Site Visit
An On-Site visit will be conducted when:

- Personal contact with the complainant and the respondent may yield information and clarification that might not otherwise be discovered by only reviewing the written documents or telephone contacts;
- It is necessary to review the physical environment;
- More effective communication can be established with representatives and witnesses of the complainant and respondent; and
- Documentation can only be examined on-site for reasons of convenience, cost, format, or volume.

Obtaining Evidence
Evidence requested will relate to the issues cited in the complaint and should contain some or all of the following:

- The policies and procedures regarding the practice that complainant has alleged;
- All documents relating to respondent’s dealing with the complainant in the situation described in the complaint;
- Documents which exhibit how others, not in the complainant’s group, were treated under similar circumstances;
- Respondent’s reason(s) for the action taken; and
- A formal position statement from respondent responding to complainant’s allegations.

Types of Evidence include the following

- Circumstantial Evidence – Includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data;
- Comparative Evidence – A comparison between similarly situated individuals;
- Direct Evidence – Related to the respondent’s motive, it is defined as any statement or action by an official of the respondent that indicates a bias against members of a particular group;
- Documentary Evidence – Written material, which is generated during the course of normal business activity;
- Statistical Evidence – Statistics, facts, or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject; and
- Testimonial Evidence – Evidence which is provided orally.
Analyzing Data
Data must be analyzed to determine whether a violation has occurred. When analyzing data, the following elements will be considered:

- Review what happened to the complainant;
- Compare complainant’s treatment with the appropriate policies and procedures;
- Compare complainant’s treatment with others in the same situation;
- Review respondent’s reason(s) for the treatment afforded the complainant; and
- Compare respondent’s treatment of the complainant with the treatment afforded others.

Writing the Investigative Report
The Investigative Report (IR) will be submitted to the Commissioner within sixty days from receipt of the complaint and will contain the sections noted below. A copy of the investigative report shall be forwarded to the respective subrecipient and USDOT agency within the same time period.

- Complainant(s) Name and Address
- Respondent(s) Name and Address
- Applicable Law
- Basis of the complaint
- Analysis of the issues raised in the course of the investigation
- Findings for each issue with a corresponding conclusion for each issue. Findings are based upon the preponderance of the evidence that the allegation was more likely to have occurred or not occurred.
- Recommended decision
- Recommendations for remedial action (if applicable)

Records
The MaineDOT shall maintain records of external complaints, identifying each complaint by race, color, sex, age, religion/creed, disability, national origin or retaliation. The records will indicate:

- The nature of the complaint;
- The recipient agency with which the complaint was filed;
- The date the complaint was filed;
- The investigative report;
- The complaint disposition and date; and
- Other pertinent information.

Final Decision
1. The Commissioner or his/her authorized designee will issue letters of finding to the complainant and respondent within ninety days from receipt of the complaint.
2. If the complainant is dissatisfied with the MaineDOT’s resolution of the complaint, he/she has the right to file a complaint with the:
3. If additional clarification of procedures is required the MaineDOT will utilize the FHWA Procedures Manual for Processing External Complaints of Discrimination as a reference. The manual may be found at:

Maine Department of Transportation  
External Discrimination Complaint Form  

(Title VI/Nondiscrimination Complaints)

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
<th>Name of Person(s) That Discriminated Against You</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
<th>Location and Position of Person (If Known)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City, State, Zip</th>
<th>City, State, Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agency involved</th>
<th>Date of Alleged Incident</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discrimination Because of:</th>
<th>Race</th>
<th>Color</th>
<th>National Origin</th>
<th>Sex</th>
<th>Age</th>
<th>Disability</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What Remedy are you requesting?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

Explain As Briefly And Clearly As Possible What Happened And How You Were Discriminated Against. Indicate Who Was Involved. Be Sure To Include How Other Persons Were Treated Differently Than You. Also Attach Any Written Material Pertaining To Your Case.

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please Mail Complaint to:

Maine Department of Transportation  
Civil Rights Office  
# 16 State House Station  
Augusta, Maine 04333-0016  
Or Call (207) 624-3056 or TYY Relay 711
X. DISSIMINATION OF TITLE VI INFORMATION

Public Participation

Planning (23 CFR 450.210 (a) & 23 CFR 450.316 (a)), Environment (National Environmental Policy Act of 1969), Rights-of-Way (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended), and Design (23 U.S.C. 109 (h)) require effective public involvement/public participation processes, which is be combined into a MaineDOT’s Public Involvement in Transportation Decision Making(Plan). Below are highlights from this Plan:

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 helps 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 they:

- Provide fresh perspectives to project planners and developers
- Give MaineDOT information about community-specific issues and concerns
- Allow MaineDOT to identify potential controversies
- Provide feedback on how to get these communities involved
- Ensure that the solutions ultimately selected are those that best meet the communities’ needs
- To maximize the effectiveness of the department’s public participation efforts in engaging underserved people, MaineDOT staff is committed to: Plan public meetings and hearings well in advance, and publicize them in diverse media, flyers, and on the MaineDOT website
- Ensure that meeting notices state that the meeting uses accessible-format materials
- Determine what non-English languages and other cultural characteristics apply and could inhibit public participation for the particular program or activity if not accommodated, and to offer appropriate accommodations to reduce any barrier effect
- Accept both verbal and written comments in languages other than English
- Hold meetings and conduct outreach in the affected neighborhoods themselves, using community activity centers as meeting locations and venues for informal outreach
- Use varied meeting times, sizes, and locations to accommodate the schedule, transportation, and child care limitations for the community members hold meetings at convenient times and at 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)
- Make available alternative methods 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 people, to obtain advice and information about best practices and effective techniques
Public Notice

MaineDOT posts on bulletin boards and in public places at its Maine office and regional facilities the following Notice to the Public. It is also posted on the MaineDOT website at http://www.maine.gov/mdot/civilrights/title6/. MaineDOT has also developed a Non-Discrimination Poster that is placed at all work areas within the MaineDOT and is also on our website:

Notice to the Public

Maine Department of Transportation
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

In accordance with Title VI of the Civil Rights Act of 1964 and other authorities, the MaineDOT 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.

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 grounds of race, color, or national origin.

MaineDOT will work with staff, subrecipients, contractors and service beneficiaries to promote awareness for the provisions of Title VI and the responsibilities associated with that Act. We are readily available to assist you with technical assistance, resources, guidance and information on Title VI.

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 عندطلب

For more information on the MaineDOT’s civil rights programs and the procedures to file a complaint, see: http://www.maine.gov/mdot/civilrights/title6/

Complaints must be filed in person or in writing. Complaints should be directed to:

Amy E. Hughes, Director
Civil Rights Office
Maine Department of Transportation
16 State House Station
Augusta, Maine  04333
Office Phone: (207) 624-3056
Cell Phone: (207) 592-5087
A complainant may file a complaint directly with the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA) by filing a complaint at:

Colleen M. Sinotte, Civil Rights Specialist
Maine & New Hampshire Division Offices
Federal Highway Administration
53 Pleasant Street, Suite 2200
Concord, NH 03301
Phone (603) 410-4868
Fax (603) 228-2829
e-mail colleen.m.sinotte@dot.gov

XI. LIMITED ENGLISH PROFICIENCY (Language Access Plan)

MaineDOT undergoes an extensive Four Factor Analysis every three years. In that analysis the Census data shows that there are six populations of LEP persons that exceed the 1,000/5% threshold for LEP persons: Spanish or Spanish Creole, French (including Patois, Cajun), Chinese, Vietnamese, Arabic and African languages. Because the thresholds have been exceeded in these LEP populations, MaineDOT will need to re-examine its outreach for public participation to ensure they have adequate access to translation services, particularly in the high-concentration areas discussed below.

MaineDOT will continue to monitor new data to ensure that, if thresholds are exceeded in other language populations, processes will be put in place to address any language discrimination that may exist. MaineDOT’s most current Four Factor Analysis and information on translation and diversity services by county can be found on our website at: http://www.maine.gov/mdot/civilrights/title6/ and attached as Appendix C.

Each Program area is responsible for determining which personnel will interact with members of the public and will have access and understanding of LEP populations in the respective area.

Spanish or Spanish Creole. There are 2,550 Spanish or Spanish Creole LEP persons in Maine. However, there do not appear to be any Spanish LEP communities in Maine. The 2011-2015 ACS county data indicates that the largest concentrations of Spanish or Spanish Creole LEP persons appear to be in Androscoggin County (253 persons), Cumberland County (1,000), and York County (237). 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.

French. There are 8,156 French-speaking LEP persons in Maine. The 2011-2015 ACS county data shows that the greatest concentration of French-speaking LEPs are in Androscoggin County (1,672 persons), Aroostook County (2,019), Cumberland County (1,331), and York County (1,108). Again, the available data would indicate that French-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities, although there are populations of French-speaking LEP persons in Portland, Lewiston/Auburn and in the St. John Valley of Aroostook County.
Chinese. There are 1,525 Chinese LEP persons in Maine. The ACS county data shows that the greatest concentrations of Chinese LEP are in Cumberland County (291 persons), Penobscot County (284) and Kennebec County (245). Again, the available data would indicate that Chinese-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities.

Vietnamese. There are 1,010 Vietnamese LEP persons in Maine. The ACS county data shows that the greatest concentrations of Vietnamese LEP are in Cumberland County (537 persons), York County (135) and Androscoggin County (113). The available data would indicate that Vietnamese 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.

Arabic. There are 1,110 Arabic LEP persons in Maine. The ACS county data shows that the greatest concentrations of Arabic LEP are in Cumberland County (715 persons), and York County (226). The available data would indicate that Arabic 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.

African Languages. There are 1,716 African Languages LEP persons in Maine. The ACS county data indicates that the greatest concentrations of African languages LEP are in Androscoggin County (256 persons), and Cumberland County (1,404). The re-settlement communities of Lewiston/Auburn and Portland contain substantial numbers of Somali people who speak African languages. The Somali communities in Lewiston/Auburn and Portland are served by fixed route bus systems. In both locations, the communities are direct recipients of FTA funds and have their own Title VI plans.

XII. ENVIRONMENTAL JUSTICE PLAN/PROCESS

Executive Order #12898 is entitled Federal Actions to Address Environmental Justice in Minority and Low-Income Populations. Under this order, transportation agencies are required to make achieving environmental justice (EJ) part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations. EJ initiatives accomplish this goal by involving the potentially affected public in developing transportation projects that fit harmoniously within their communities, without sacrificing safety or mobility. MaineDOT complies with EJ requirements by:

- Updating the state’s demographic profile every three years to determine where low-income, non-native and minority populations reside (the most recent profile was complete in 2014 and can be accessed on our website at: http://www.maine.gov/mdot/civilrights/title6/
- Updating U.S. Census Data every three years and conducting a “Four-Factor Analysis” to determine Limited English Proficiency (LEP) population concentrations around the state
- Ensuring the participation of identified minority and low-income populations located within the limits of a proposed project by holding meetings that are close to or adjacent to the project areas
• Providing good access for public participation—holding public forums and meetings at facilities that are ADA-accessible, and providing translation services requested for non-English speaking populations when they are requested
• Designating and training EJ liaisons—ensuring that they are knowledgeable about the EJ requirements of federal agencies

MaineDOT will work in collaboration with FHWA Division staff in incorporating any changes that may be required pursuant to their review of MaineDOT’s public participation process.

XIII. REVIEW OF MAINE DOT DIRECTIVES

The Director of the Civil Rights Office receives and reviews all draft Administrative Policy Memoranda and reviews those 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.

XIV. COMPLIANCE AND ENFORCEMENT PROCEDURES

Noncompliance Procedure Specified in 23 CFR §200.9

In the event MaineDOT determines, after the completion of a pre-award or post-award desk audit review, compliance review or complaint investigation, 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.

Noncompliance Procedures Specified in 23 CFR §200.11

In the event a FHWA review of MaineDOT’s Title VI program contains deficiencies and recommended actions, the FHWA Division Office will forward a report to MaineDOT for corrective action. MaineDOT shall have a period of not longer than 90 days after receipt of FHWA’s of deficiency report to voluntarily correct the deficiency(ies). If MaineDOT fails or refuses to voluntarily comply with corrective action within the period allowed.
## APPENDIX A – OUTREACH CONTACT LIST TRANSLATION RESOURCES DOCUMENT

**Outreach Contact List – Translation Resource Document**

<table>
<thead>
<tr>
<th>Country</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cambodia</td>
<td>Sokhany Sieng, 35 Oxford St., Portland ME 04101, (207)775-5073</td>
</tr>
<tr>
<td></td>
<td><strong>Maine Khmer Council</strong> <em>Portland Housing Authority</em> 14 Baxter Blve., Portland ME 04101, Shawna Ohm, President, (207)773-4753 Ext. 267</td>
</tr>
<tr>
<td></td>
<td><strong>Asian American Heritage</strong> Research Foundation 83 Sherman St., Portland ME 04101, Grace Valenzuela, (207)874-8135, email: <a href="mailto:graceval@gwi.net">graceval@gwi.net</a></td>
</tr>
<tr>
<td></td>
<td><strong>Maine Families with Children From Asia</strong> 54 Saunders St. #2, Portland ME 04103, Christine Kukka (Portland), (207)883-1133, Coleen Quint (Lewiston/Auburn), (207)784-7726</td>
</tr>
<tr>
<td></td>
<td><strong>Office of Rehabilitation Services</strong> Maine Dept. of Labor 2 Anthony Ave., Augusta ME 04333, Voice: (207)624-5950, TTY: 1-888-755-0023</td>
</tr>
<tr>
<td></td>
<td><strong>Chinese Association of Maine</strong> 104 Berkshire Rd., Portland ME 04103, Cunli Jia, Vice President, (207)775-6139</td>
</tr>
<tr>
<td></td>
<td><strong>Korean American Association</strong> 626 Congress St., Portland ME 04101, Won Bae Park, President, (207)772-8675</td>
</tr>
<tr>
<td></td>
<td><strong>Alpha One/Wheelchairs Unlimited</strong> 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></td>
</tr>
<tr>
<td></td>
<td><strong>Disability Rights Center</strong> P.O. Box 2007, Augusta ME 04338-2007, Voice and TDD: 626-2774</td>
</tr>
<tr>
<td></td>
<td><strong>NAACP Portland</strong> 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></td>
</tr>
</tbody>
</table>
Contacting and Scheduling an ASL Interpreter

All ASL interpretation vendors listed below received contracts based on a competitive process. Therefore, each department or agency is free to choose the vendor with which it would like to work by using the information below. You can use the vendor’s “Online Request Form” (if available), or use this template (ASL Interpreter Scheduling Confirmation Form) to document the service you are requesting. Regardless of how you make your appointment, be sure to agree upon an estimated total price for the appointment (including travel, if applicable) in advance.

Once you have agreed upon an estimated total price with the vendor and scheduled the interpreter appointment, follow these instructions (AdvantageME Delivery Order Instructions) to create a Delivery Order against the Master Agreement (MA) number shown below the vendor’s name. When you receive the invoice after the service has been provided, payment must be made within 30 days from when you receive the invoice. You may need to contact your Service Center to accomplish this part of the process, which will vary by department.

In the event that you need to cancel an appointment, follow this link (Cancellation Policy).

<table>
<thead>
<tr>
<th>Vendor Name</th>
<th>Bangor Interpreting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agreement #</td>
<td>18P- 1007300000000000024</td>
</tr>
<tr>
<td>Point(s) of Contact:</td>
<td>Ms. Pat Heitmann</td>
</tr>
<tr>
<td>Telephone(s):</td>
<td>207-862-2947 (voice)</td>
</tr>
<tr>
<td></td>
<td>207-862-4027 (fax)</td>
</tr>
<tr>
<td></td>
<td>207-862-4063 (TTY)</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:bangorinterpreting@tds.net">bangorinterpreting@tds.net</a></td>
</tr>
<tr>
<td>Website:</td>
<td><a href="http://www.bangorinterpreting.com">www.bangorinterpreting.com</a></td>
</tr>
<tr>
<td>Online Request Form:</td>
<td><a href="http://www.bangorinterpreting.com/request-services/">http://www.bangorinterpreting.com/request-services/</a></td>
</tr>
<tr>
<td>Address:</td>
<td>7 Summer Street, Hampden, ME 04444</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Vendor Name</th>
<th>Certified Interpreting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agreement #</td>
<td>18P-10042300000000000181</td>
</tr>
<tr>
<td>Point(s) of Contact:</td>
<td>Mr. Victor Vigna, or Ms. Ruth Vigna</td>
</tr>
<tr>
<td>Telephone(s):</td>
<td>207-798-7995 (voice/TTY)</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:services@certifiedinterpreting.com">services@certifiedinterpreting.com</a></td>
</tr>
<tr>
<td>Website:</td>
<td><a href="http://www.cimaine.com">www.cimaine.com</a></td>
</tr>
<tr>
<td>Online Request Form:</td>
<td><a href="http://www.certifiedinterpreting.com/servicerequest.aspx">http://www.certifiedinterpreting.com/servicerequest.aspx</a></td>
</tr>
<tr>
<td>Address:</td>
<td>PO Box 6500, Brunswick, ME 04011</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Vendor Name</th>
<th>KEWL ASL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agreement #</td>
<td>18P-10042300000000000183</td>
</tr>
<tr>
<td>Point(s) of Contact:</td>
<td>Ms. Deborah Myers</td>
</tr>
<tr>
<td>Telephone(s):</td>
<td>207-549-4733 (voice/TTY)</td>
</tr>
<tr>
<td></td>
<td>207-240-3177 (cell/text)</td>
</tr>
<tr>
<td></td>
<td>866-755-5206 (video phone)</td>
</tr>
</tbody>
</table>
Email: kewlasl@gmail.com
Address: 15 Jones Road, Somerville, Maine 04348

Vendor Name: Mary Jane Grant Sign Language Interpreting Services, LLC
Master Agreement #: 18P-11060900000000000268 (for 7/1/11 to 6/30/14)
Point(s) of Contact: Ms. Mary Jane Grant
Telephone(s): 207-651-3146 (voice)
              207-213-1325 (video phone)
Email: migrantinterpreting@gmail.com
Website: http://maryjanegrant.com
Online Request Form: http://maryjanegrant.com/contact.html
Address: PO Box 843, Sanford, ME 04073

Vendor Name: Pine Tree Society
Master Agreement #: 18P-10042800000000000192
Point(s) of Contact: Mr. Douglas Newton
Telephone(s): 207-386-5971 (voice/TTY)
              207-885-0076 (fax)
Email: interpreting@pinetreesociety.org
dnewton@pinetreesociety.org
Website: www.pinetreesociety.org
Online Request Form: http://www.pinetreesociety.org/interpreting_request.asp
Address: 51 US Route 1, Suite G, Scarborough, ME 04074

Vendor Name: Professional Interpreting
Master Agreement #: 18P-10042700000000000186
Point(s) of Contact: Kris Bracklow, or
                    Carrie Profenno
Telephone(s): 207-774-3068 (voice/TTY)
Website: http://www.professionalinterpreting.com/
Email: professionalinterpreting@maine.rr.com
       kris120@juno.com
Address: 14 Torrey Street, Portland, ME 04103

Vendor Cost and Price Information – FY14

Mary Jane Grant Interpreting - Updated Pricing FY14
Overall evaluation rank for cost: 1 (lowest costs across all service categories)

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>Service Category</td>
<td>Hourly Rate for Weekdays, 8AM – 5PM</td>
<td>Hourly Rate for After-hours, weekends, and holidays</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>-------------------------------------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$49.00/hour</td>
<td>$54.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
</tbody>
</table>

**KEWL ASL**  
Overall evaluation rank for cost: 2

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$47.00/hour</td>
<td>$52.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$49.00/hour</td>
<td>$54.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
</tbody>
</table>

**Bangor Interpreting Agency**  
Overall evaluation rank for cost: 3

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$45.00/hour</td>
<td>$50.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$65.00/hour</td>
<td>$75.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$45.00/hour</td>
<td>$55.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$56.00/hour</td>
<td>$60.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$75.00/hour</td>
<td>$75.00/hour</td>
</tr>
</tbody>
</table>

**Certified Interpreting – Updated Pricing FY14**  
Overall evaluation rank for cost: 4

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$48.00/hour</td>
<td>$53.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$63.00/hour</td>
<td>$63.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$48.00/hour</td>
<td>$53.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$48.00/hour</td>
<td>$53.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$58.00/hour</td>
<td>$68.00/hour</td>
</tr>
</tbody>
</table>
### Professional Interpreting
Overall evaluation rank for cost: 5

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$50.00/hour</td>
<td>$55.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$72.00/hour</td>
<td>$82.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$50.00/hour</td>
<td>$55.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$55.00/hour</td>
<td>$60.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$60.00/hour</td>
<td>$70.00/hour</td>
</tr>
</tbody>
</table>

### Pine Tree Society
Overall evaluation rank for cost: 6 (highest costs across all service categories)

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard ASL Interpreter Services</td>
<td>$64.00/hour</td>
<td>$81.00/hour</td>
</tr>
<tr>
<td>2. Legal ASL Interpreter Services</td>
<td>$75.00/hour</td>
<td>$90.00/hour</td>
</tr>
<tr>
<td>3. Limited Language/Deaf Tandem Interpreter Services</td>
<td>$64.00/hour</td>
<td>$81.00/hour</td>
</tr>
<tr>
<td>4. Short Notice ASL Interpreter Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$81.00/hour</td>
<td>$81.00/hour</td>
</tr>
<tr>
<td>5. Emergency ASL Interpreter Services (immediate assistance required)</td>
<td>$162.00/hour</td>
<td>$162.00/hour</td>
</tr>
</tbody>
</table>

### Foreign Language Interpretation / Translation Services for In Person Spoken Language Interpreting Services:

New England Interpreter Services
Martin Sungoyo
207-409-5514
Marin@translateforme.net
New England Interpreter Service provides the following fee schedule
### Immigrant Resource Center of Maine

**Catholic Charities Maine**

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard In Person Spoken Language Interpreting Services</td>
<td>$50 /hour</td>
<td>$55 /hour</td>
</tr>
<tr>
<td>2. Short Notice In Person Spoken Language Interpreting Services (less than two business days notice, but not “Emergency” / “immediate”)</td>
<td>$50 /hour</td>
<td>$55 /hour</td>
</tr>
<tr>
<td>3. Emergency In Person Language Interpreting Services (immediate assistance required)</td>
<td>$50 /hour</td>
<td>$55 /hour</td>
</tr>
<tr>
<td>4. Legal In Person Spoken Language Interpreting Services</td>
<td>$50 /hour</td>
<td>$55 /hour</td>
</tr>
<tr>
<td>5. Medical In Person Spoken Language Interpreting Services</td>
<td>$50 /hour</td>
<td>$55 /hour</td>
</tr>
</tbody>
</table>

**List of Spoken Languages Offered:**

- Acholi
- ASL
- Amharic
- Arabic
- Bar
- Bulgarian
- Cambodian
- Cantonese
- Darfur
- Dinka
- Farsi
- French
- Fulo
- Japanese
- Juba Arabic
- Khmer
- Kinyarwanda
- Kirundi
- Lingala
- Mandarin
- Nuer
- Russian
- Serbo-Croatian
- Somali
- Spanish
- Sudanese/Arabic
- Swahili
- Vietnamese
- Zande

---

**Immigrant Resource Center of Maine** provides the following fee schedule for In Person Spoken Language Interpreting Services:

Immigrant Resource Center of Maine
265 Lisbon St. 2nd Floor
P.O. Box 397
Lewiston, ME 04243
207-753-0061
http://www.ircofmaine.org

**Catholic Charities Maine** provides the following fee schedule for In Person Spoken Language Interpreting Services:

Catholic Charities Maine Language Partners
80 Sherman St.
Portland, ME 04101
207-523-
https://www.ccmaine.org/language-partners
Geneva Worldwide, Inc. provides the following fee schedule for In Person Spoken Language Interpreting Services (call 1-877-GO-GENEVA, ref. Maine Contract #120913*0069).

<table>
<thead>
<tr>
<th>Service Category</th>
<th>Hourly Rate for Weekdays, 8AM – 5PM</th>
<th>Hourly Rate for After-hours, weekends, and holidays</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Standard In-Person Spoken Language Interpreting Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tier 1 Spanish</td>
<td>$48.99/hour</td>
<td>$61.24/hour</td>
</tr>
<tr>
<td>Tier 2 Languages, including French</td>
<td>$67.99/hour</td>
<td>$84.99/hour</td>
</tr>
<tr>
<td>Tier 3 Languages, including Arabic, Somali and Khmer</td>
<td>$81.99/hour</td>
<td>$102.49/hour</td>
</tr>
<tr>
<td>2. Short Notice In-Person Spoken Language Interpreting Services (less than two business days’ notice, but not “Emergency”/“immediate”)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tier 1 Spanish</td>
<td>$61.24/hour</td>
<td>$76.55/hour</td>
</tr>
<tr>
<td>Tier 2 Languages, including French</td>
<td>$84.99/hour</td>
<td>$106.24/hour</td>
</tr>
<tr>
<td>Tier 3 Languages, including Arabic, Somali and Khmer</td>
<td>$102.49/hour</td>
<td>$128.11/hour</td>
</tr>
<tr>
<td>3. Emergency In-Person Language Interpreting Services (immediate assistance required)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tier 1 Spanish</td>
<td>$73.49/hour</td>
<td>$91.86/hour</td>
</tr>
<tr>
<td>Tier 2 Languages, including French</td>
<td>$101.99/hour</td>
<td>$127.49/hour</td>
</tr>
<tr>
<td>Tier 3 Languages, including Arabic, Somali and Khmer</td>
<td>$122.99/hour</td>
<td>$153.74/hour</td>
</tr>
<tr>
<td>4. Legal In-Person Spoken Language Interpreting Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tier 1 Spanish</td>
<td>$69.83/hour</td>
<td>$87.29/hour</td>
</tr>
<tr>
<td>Tier 2 Languages, including French</td>
<td>$86.78/hour</td>
<td>$108.48/hour</td>
</tr>
<tr>
<td>Tier 3 Languages, including Arabic, Somali and Khmer</td>
<td>$91.84/hour</td>
<td>$114.80/hour</td>
</tr>
<tr>
<td>5. Medical In-Person Spoken Language Interpreting Services</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tier 1 Spanish</td>
<td>$48.99/hour</td>
<td>$61.24/hour</td>
</tr>
<tr>
<td>Tier 2 Languages, including French</td>
<td>$67.99/hour</td>
<td>$84.99/hour</td>
</tr>
<tr>
<td>Tier 3 Languages, including Arabic, Somali and Khmer</td>
<td>$81.99/hour</td>
<td>$102.49/hour</td>
</tr>
</tbody>
</table>
Geneva Worldwide, Inc. has over 6,000 linguists worldwide to assist clients with their language needs in the following languages:

Afrikaans  Farsi  Lanzhou  Sichuan
Akan  Fijian  Lao  Sicilian
Albanian  Finnish  Latvian  Sinhalese
ASL  Flemish  Lebanese  Slovak
Amharic  French  Lithuanian  Somali
Arabic  French Canadian  Maltese  Somaliland
Armenian  Frisian  Malay  Spanish
Ashanti  Fulde  Malayalam  Sudanese
Assyrian  Fuzhou  Maltese  Swahili
Axeil  Ga  Mandarin  Swedish
Balasa  Georgian  Mandarin  Tagalog
(Malaysia)  German  Marathi  Taiwanese
Hambara  Greek  Marshallese  TAmil
Basque  Greenlandic  May–May  Tatar
Bassa  Guarani  Mian  Tonga
Belorussian  Hakka  Mongolian  Tongnamese
Bengali  Hebrew  More  Tongan
Boantan  Hindi  Myanmar  Turkmen
Bulgarian  Hmong  Navajo  Turkish
Burmese  Hua  Nepali  Twi
Cambodian  Hungarian  Norwegian  Uighur
Cantabrian  Ibo  Nia  Ukrainian
Cape Verde  Icelandic  Oromifa  Urdu
Celtic  Indonesian  Punjabi  Uzbek
Chamorro  Italian  Pashto  Vietnamese
Chinese Yunnan  Javanese  Polish  Welsh
Chuvash  Japanese  Portuguese  Wolof
Chukchij  Javanese  Portuguese  Wolof
Cotocoll  Kannada  Romanian  Yiddish
Creole (Haitian, French)  Karen  Russian  Yoruba
Croatian  Khmer  Samoan  Zulu
Czech  Khmer  Sangoa  
Danish  Kirundi  Serbian  
Dari  Korean  
Dinka  Kpelle  
Dutch  Kramen  
Estonian  Kurdish  
Ewe  Luo  

Department of Justice, Federal Protections Against National Origin Discrimination (pamphlet):

Arabic PDF version
Cambodian PDF version
Chinese PDF version
English HTML version (PDF version)
Farsi PDF version (4.7 MB file)
French PDF version
Haitian Creole PDF version
Hmong PDF version (3.1 MB file)
Hindi PDF version (2.1 MB file)
Korean PDF version
Laotian PDF version
Protecciones Federales Contra la Discriminación por Origen Nacional (PDF)
Punjabi PDF version
Russian PDF version
Tagalog PDF version
Urdu PDF version Vietnamese PDF version
APPENDIX B – MAINE DOT NONDISCRIMINATION BROCHURE AND POSTER
NON-DISCRIMINATION TITLE VI POSTER

Title VI and Nondiscrimination Commitment (FHWA):
Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, MaineDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age or disability.

Title VI and Nondiscrimination Commitment (FTA):
Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, MaineDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color and national origin.

Complaint Procedures:
MaineDOT has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with MaineDOT. Any such complaint must be in writing and filed with the MaineDOT Title VI Coordinator within one hundred eighty (180) calendar days following the date of the alleged discriminatory occurrence. For more information, please contact the MaineDOT’s Title VI Coordinator.

ADA/504 Statement:
Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations, MaineDOT will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. MaineDOT will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access MaineDOT facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, MaineDOT asks that requests be made at least five (5) calendar days prior to the need for accommodation. Questions, concerns, comments or requests for accommodation should be made to MaineDOT’s ADA Coordinator.

Services are provided free without charge for individuals with special needs with disabilities. Any fees will be paid by the recipient or subrecipient. The public will have access to translators, “I Speak Cards”, TTY/TDD services and vital documents translated when requested.

MaineDOT Title VI/ADA Coordinator
Civil Rights Office
Maine Department of Transportation
16 State House Station
Augusta, Maine 04333
Office Phone: (207) 624-3056
TTY: Users Dial MAINE RELAY 711
APPENDIX C - 2017 MAINEDOT FOUR FACTOR ANALYSIS

Maine Department of Transportation
Limited English Proficiency Analysis for Transit

Introduction

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, which requires meaningful access to all federally assisted programs and activities by persons with limited English proficiency.

Executive Order 13166 states that individuals who do not speak English well and who have a limited ability to read, write, speak or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit or encounter. These individuals are referred to as being limited in their ability to speak, read, write or understand English, hence the designation “LEP,” or Limited English Proficient.

The USDOT published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency” in the Dec. 14, 2005, Federal Register. The guidance explicitly identifies state agencies such as MaineDOT as organizations that are required to follow Executive Order 13166.

The guidance applies to all USDOT funding recipients, which includes state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state and local transit operators, among others. Coverage extends to a recipient’s entire program or activity.

The Four Factor Analysis

Under guidance from the U.S. Department of Transportation, and in accordance with Circular FTA C 4702.1B, MaineDOT is obligated to determine the extent of its obligation to provide LEP services to its transit population. This determination must be based on an analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
2. The frequency with which LEP persons come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people’s lives; and
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Factor #1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Maine has a relatively low percentage of people who don’t speak English very well. An analysis of Census data reflected in American Community Survey (ACS) data for 2011-2015, which is included in Table 1 below, shows that statewide, there are 20,966 people over the age of 5, or 1.7% of the total population of people over the age of 5 (1,263,694 people) who speak English less than very well.
There are only six languages in which the number of persons who speak English less than “very well” exceed the 1,000 person/5% threshold: Spanish or Spanish Creole, French, Chinese, Vietnamese, Arabic and African languages.

**TABLE 1**
American Community Survey B16001. Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over, Maine: 2011-2015

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of Speakers</th>
<th>Speak English Very Well</th>
<th>Speak English Less than Very Well</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population 5 years and over</td>
<td>1,263,694</td>
<td>1,179,938</td>
<td></td>
</tr>
<tr>
<td>Speak only English</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>12,301</td>
<td>9,751</td>
<td>2,550</td>
</tr>
<tr>
<td>French (incl. Patois, Cajun)</td>
<td>41,664</td>
<td>33,508</td>
<td>8,156</td>
</tr>
<tr>
<td>French Creole</td>
<td>294</td>
<td>284</td>
<td>10</td>
</tr>
<tr>
<td>Italian</td>
<td>1,115</td>
<td>966</td>
<td>149</td>
</tr>
<tr>
<td>Portuguese or Portuguese Creole</td>
<td>814</td>
<td>680</td>
<td>134</td>
</tr>
<tr>
<td>German</td>
<td>3,415</td>
<td>3,036</td>
<td>379</td>
</tr>
<tr>
<td>Yiddish</td>
<td>40</td>
<td>33</td>
<td>7</td>
</tr>
<tr>
<td>Other West Germanic languages</td>
<td>662</td>
<td>486</td>
<td>176</td>
</tr>
<tr>
<td>Scandinavian languages</td>
<td>486</td>
<td>456</td>
<td>30</td>
</tr>
<tr>
<td>Greek</td>
<td>605</td>
<td>492</td>
<td>113</td>
</tr>
<tr>
<td>Russian</td>
<td>1,427</td>
<td>1,008</td>
<td>419</td>
</tr>
<tr>
<td>Polish</td>
<td>509</td>
<td>327</td>
<td>182</td>
</tr>
<tr>
<td>Serbo-Coatian</td>
<td>424</td>
<td>255</td>
<td>169</td>
</tr>
<tr>
<td>Other Slavic languages</td>
<td>443</td>
<td>341</td>
<td>102</td>
</tr>
<tr>
<td>Armenian</td>
<td>77</td>
<td>77</td>
<td>0</td>
</tr>
<tr>
<td>Persian</td>
<td>576</td>
<td>417</td>
<td>159</td>
</tr>
<tr>
<td>Gujarati</td>
<td>163</td>
<td>163</td>
<td>0</td>
</tr>
<tr>
<td>Hindi</td>
<td>459</td>
<td>411</td>
<td>48</td>
</tr>
<tr>
<td>Urdu</td>
<td>285</td>
<td>180</td>
<td>105</td>
</tr>
<tr>
<td>Other Indic languages</td>
<td>303</td>
<td>201</td>
<td>102</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>458</td>
<td>331</td>
<td>127</td>
</tr>
<tr>
<td>Chinese</td>
<td>2,691</td>
<td>1,166</td>
<td>1,525</td>
</tr>
<tr>
<td>Japanese</td>
<td>715</td>
<td>518</td>
<td>197</td>
</tr>
<tr>
<td>Korean</td>
<td>452</td>
<td>242</td>
<td>210</td>
</tr>
<tr>
<td>Mon-Khmer, Cambodian</td>
<td>1,050</td>
<td>519</td>
<td>531</td>
</tr>
<tr>
<td>Hmong</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Thai</td>
<td>510</td>
<td>205</td>
<td>305</td>
</tr>
<tr>
<td>Laotian</td>
<td>43</td>
<td>36</td>
<td>7</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>1,904</td>
<td>894</td>
<td>1,010</td>
</tr>
<tr>
<td>Other Asian Languages</td>
<td>950</td>
<td>444</td>
<td>506</td>
</tr>
<tr>
<td>Tagalog</td>
<td>1,643</td>
<td>1,073</td>
<td>570</td>
</tr>
<tr>
<td>Other Pacific Island Languages</td>
<td>222</td>
<td>175</td>
<td>47</td>
</tr>
</tbody>
</table>
TABLE 1  
American Community Survey B16001. Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over, Maine: 2011-2015

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of Speakers</th>
<th>Speak English Very Well</th>
<th>Speak English Less than Very Well</th>
</tr>
</thead>
<tbody>
<tr>
<td>Navajo</td>
<td>11</td>
<td>11</td>
<td>0</td>
</tr>
<tr>
<td>Other Native North American languages</td>
<td>992</td>
<td>902</td>
<td>90</td>
</tr>
<tr>
<td>Hungarian</td>
<td>39</td>
<td>34</td>
<td>5</td>
</tr>
<tr>
<td>Arabic</td>
<td>2,243</td>
<td>1,133</td>
<td>1,110</td>
</tr>
<tr>
<td>Hebrew</td>
<td>138</td>
<td>130</td>
<td>8</td>
</tr>
<tr>
<td>African languages</td>
<td>3,388</td>
<td>1,672</td>
<td>1,716</td>
</tr>
<tr>
<td>Other and unspecified languages</td>
<td>245</td>
<td>233</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>83,756</strong></td>
<td><strong>62,790</strong></td>
<td><strong>20,966</strong></td>
</tr>
</tbody>
</table>

Factor #1 contains four sub-factors which are discussed below:

a) **How LEP persons interact with the recipient’s agency.** The LEP Guidance from FTA recommends that “recipients should first examine their prior experience with LEP individuals and determine the breadth and scope of language services that are needed.”

Within the realm of public transportation, MaineDOT can potentially interact with LEP persons in two primary ways. In terms of direct experience, MaineDOT may come into contact with LEP individuals at public meetings or public hearings associated with planning efforts. MaineDOT has a number of periodic planning efforts wholly within or related to public transportation that entails public review and comment:

- Transit Workshops undertaken for Locally Coordinated Transit Plans
- Studies of specific issues that may entail public outreach. One example is studies on extending passenger rail services.

At public meetings for any of these initiatives, it is incumbent on MaineDOT to provide a means for LEP individuals to participate in a meaningful way. In advertising the meetings, MaineDOT indicates that translation services are available upon request. Given the very low percentage of LEP individuals, this service has not been requested at a meeting in the past three years.

Other than public meetings, MaineDOT must ensure that those individuals or groups contacting the agency to lodge a complaint have interpretation services available to them, if necessary.

The other form of interaction of LEP individuals with MaineDOT is through sub-recipients. The public transit providers in Maine have the potential for having more contact with LEP persons than MaineDOT, although the degree of interaction varies across the state. It is the responsibility of the providers to deploy the resources necessary to ensure that LEP individuals have fair access to the available services. However, it is MaineDOT’s responsibility as the FTA grant recipient to monitor the efforts of the providers to ensure compliance with Executive Order 13166.
The forms of LEP interaction experienced by the transit providers include the following:

- Providing basic information on how to use public transit services in the area
- Purchasing fares
- Making reservations on demand response services
- Handling passenger complaints
- Gathering data including on-board customer surveys

In its ongoing communications with the transit providers and in its on-site reviews, MaineDOT gauges the degree to which any of the providers have LEP interactions, and works to ensure that appropriate resources are deployed to comply with the regulations.

MaineDOT has access to a number of language translation services and is prepared to refer these services to its sub-recipients, should the need arise. That information is available from MaineDOT’S Civil Rights Office.

b) **Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group.** Based on the information contained in Table 1, there are six populations of LEP persons that exceed the 1,000/5% threshold for LEP persons: Spanish or Spanish Creole, French (including Patois, Cajun), Chinese, Vietnamese, Arabic and African languages.

- **Spanish or Spanish Creole.** According to the data in Table 1, there are 2,550 Spanish or Spanish Creole LEP persons in Maine. However, there do not appear to be any Spanish LEP communities in Maine. The 2011-2015 ACS county data indicates that the largest concentrations of Spanish or Spanish Creole LEP persons appear to be in Androscoggin County (253 persons), Cumberland County (1,000), and York County (237). 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.

- **French.** According to the data in Table 1, there are 8,156 French-speaking LEP persons in Maine. The 2011-2015 ACS county data shows that the greatest concentration of French-speaking LEPs are in Androscoggin County (1,672 persons), Aroostook County (2,019), Cumberland County (1,331), and York County (1,108). Again, the available data would indicate that French-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities, although there are populations of French-speaking LEP persons in Portland, Lewiston/Auburn and in the St. John Valley of Aroostook County.

- **Chinese.** Table 1 indicates that there are 1,525 Chinese LEP persons in Maine. The ACS county data shows that the greatest concentrations of Chinese LEP are in Cumberland County (291 persons), Penobscot County (284) and Kennebec County (245). Again, the available data would indicate that Chinese-speaking LEP persons are dispersed throughout Maine, rather than concentrated in communities.
• **Vietnamese.** Table 1 indicates that there are 1,010 Vietnamese LEP persons in Maine. The ACS county data shows that the greatest concentrations of Vietnamese LEP are in Cumberland County (537 persons), York County (135) and Androscoggin County (113). The available data would indicate that Vietnamese 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.

• **Arabic.** Table 1 indicates that there are 1,110 Arabic LEP persons in Maine. The ACS county data shows that the greatest concentrations of Arabic LEP are in Cumberland County (715 persons), and York County (226). The available data would indicate that Arabic 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.

• **African Languages.** According to the data in Table 1, there are 1,716 African Languages LEP persons in Maine. The ACS county data indicates that the greatest concentrations of African languages LEP are in Androscoggin County (256 persons), and Cumberland County (1,404). The re-settlement communities of Lewiston/Auburn and Portland contain substantial numbers of Somali people who speak African languages. The Somali communities in Lewiston/Auburn and Portland are served by fixed route bus systems. In both locations, the communities are direct recipients of FTA funds and have their own Title VI plans.

c) **The literacy skills of LEP populations in their native languages, in order to determine whether translation or documents will be an effective practice.** MaineDOT has had virtually no contact with LEP populations at its public meetings. More direct contact with LEP populations would potentially occur through sub-recipient operation of transit services (see discussion under Factors 2 and 4).

d) **Whether LEP persons are underserved by the recipient due to language barriers.** MaineDOT has no data that suggests that LEP populations are underserved in our programs and services. MaineDOT makes every attempt to provide language services (see discussion under Factors 2 and 4).

**Factor #2: The frequency with which LEP persons come in contact with programs, activities or services.** As indicated in discussion 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.

In general transit providers throughout Maine do not come into frequent contact with LEP persons, but there are some exceptions:

• **Region 1: Aroostook Regional Transportation Program (ARTS).** A significant portion of the population speaks English and French, and in the St. John Valley, French is the primary language of some of the region’s elderly population. Most French-speaking people also speak
English. Language has not been a barrier. There is daily contact with French/English speaking persons.

- **Region 2: West’s Bus Service.** Approximately 20% of the riders on West’s Bus Service speak Spanish. Many of these riders are migrant workers who have been recruited for work in blueberry fields, pickle-canning and sea urchin operations. There is daily contact with Spanish-speaking persons. The migrant population increases during the summer months and falls off after the Holiday season as the migrants work in the wreath industry and move on after the first of the year.

- **Region 6: Regional Transportation Program (RTP).** There is a diversity of languages that are spoken in Cumberland County. Contact frequency with an LEP person is one to three times per month.

- **Region 7: Western Maine Transportation Services (WMTS).** There is a French-speaking population in Lewiston/Auburn, but most of the population speaks English as well. There is also a Somali population, many of whom speak a language that is based on French. There is periodic contact with LEP persons.

**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 of their ability to speak English well. MaineDOT must ensure through its oversight activities that the providers are upholding this responsibility.

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. MaineDOT provides oversight and ensures in its own planning projects that LEP and other protected classes of persons are considered in the transportation planning process.

Except in Region 2, the importance of providing transportation services to the LEP population may not be as great as other services such as housing, medical services or legal services to a person who has been arrested. However, the availability of transportation services to the LEP population is important. An LEP person’s inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or employment.

In particular, in Region 2, West’s transportation service is very important for migrant workers needing to get to their places of important. Most of the migrants do not have their own vehicles, and there are no other transportation options.

**Factor #4: Resources available to the recipient and overall costs to provide LEP assistance.** Because of the very low incidence of LEP persons in Maine overall, the cost to accommodate them has not been burdensome. MaineDOT uses translation services available under State contract. Cost for these services range in the $50.00 – $65.00/hour range. Cost at this time is minimal given the limited need and requests. There are a number of resources that are being provided. MaineDOT has distributed to all transit providers “I Speak” Language Identification cards. Highlights of other resources are described below. In all cases except West’s, the costs of these services are minimal.
Region 1: Aroostook Regional Transportation Program (ARTS). A number of ARTS’ bus drivers speak French, as do some members of the central office staff.

Region 2: West’s Bus Service. A company, Escort Inc. contracts with West’s to provide migrant worker transportation. Escort provides translators and has helped West’s publish its timetable in Spanish. Several of West’s bus drivers speak Spanish. The costs of translator services are not known because there is no charge to West’s for this service.

Region 6: Regional Transportation Program (RTP). RTP has a contract with Language Line Services. Translator services are utilized on average about one to three times per month.

Region 7: Western Maine Transportation Services (WMTS). About 2.4% of WMTS’ ridership consists of Somalis, including Somali children who are fluent in English and often act as interpreters for their parents. Many of the rides for Somalis are arranged through Child Development Services, Catholic Charities or Lutheran Services, whose staff serve as translators. WMTS also has a contract for translator services, but has not used it.

LEP Analysis of Factors 2, 3 and 4 by Provider

The following overview has been compiled based on information provided by MaineDOT’s sub-recipients. The Title VI plans of sub-recipients may contain additional information.

Region 1

Aroostook Regional Transportation Program (ARTS)
• Factor 2 – Frequency of Contact: There is daily contact with French/English speaking persons.
• Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
• Factor 4 – Resources: ARTS has “I Speak” language Identification cards. A number of ARTS’ bus drivers speak French, as do some members of the central office staff.

Region 2

Washington-Hancock Community Agency
• Factor 2 – Frequency of Contact: Language barriers have not been an issue.
• Factor 3 – Importance of Program: Not an issue.
• Factor 4 – Resources: WHCA has “I Speak” language Identification cards as well as a poster displayed in the office. WHCA also has the number of Language Line Services if the need arises. Drivers have also downloaded Apps to communicate with riders.

Downeast Transportation, Inc. (DTI)
• Factor 2 – Frequency of Contact: Language barriers have not been an issue, in spite of the fact that many summer visitors come to Mount Desert Island from foreign countries.
• Factor 3 – Importance of Program: Not applicable.
• Factor 4 – Resources: DTI has “I Speak” language Identification cards.

West’s Transportation
• Factor 2 – Frequency of Contact: There is daily contact with Spanish speaking persons, including many LEP persons.
• Factor 3 – Importance of Program: West’s transportation service is presumed to be very important for migrant workers needing to get to their places of important. Most of the migrants do not have their own vehicles, and there are no other transportation options.

• Factor 4 – Resources: A company, Escort Inc, contracts with West’s to provide migrant worker transportation. Escort provides translators and has helped West’s publish its timetable in Spanish. Several of West’s bus drivers speak Spanish.

Region 3

Penquis Transportation Program
• Factor 2 – Frequency of Contact: Language barriers have not been an issue.
• Factor 3 – Importance of Program: Not applicable.
• Factor 4 – Resources: Penquis has “I Speak” language Identification cards on its buses.

Cyr Bus Line
• Factor 2 – Frequency of Contact: Language barriers have not been an issue.
• Factor 3 – Importance of Program: Not applicable.
• Factor 4 – Resources: Cyr has “I Speak” language Identification cards on its buses.

Region 4

KVCAP
• Factor 2 – Frequency of Contact: Several times a year, there are one or more riders who do not speak English well.
• Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
• Factor 4 – Resources: KVCAP has “I Speak” language Identification cards on its buses. Several people on KVCAP’s staff speak French, and one is fluent in Spanish. KVCAP would use the service of Language Line on a fee basis if the need arises.

Region 5

Mid-Coast Public Transportation (MCPT)
• Factor 2 – Frequency of Contact: Language barriers have not been an issue.
• Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
• Factor 4 – Resources: MCPT has “I Speak” language Identification cards on its buses. MCPT also has the use of translator services if the need arises.

Bath City Bus
• Factor 2 – Frequency of Contact: Language barriers have not been an issue.
• Factor 3 – Importance of Program: Not applicable.
• Factor 4 – Resources: None.
Region 6

Regional Transportation Program (RTP)

- Factor 2 – Frequency of Contact: Contact frequency with an LEP person is one to three times per month.
- Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
- Factor 4 – Resources: RTP has “I Speak” language Identification cards on its buses. RTP also has a contract with Language Line Services which RTP uses on average about one to three times per month.

Region 7

Western Maine Transportation Services

- Factor 2 – There is periodic contact with LEP persons – mostly the French-speaking population in Lewiston/Auburn, and the Somali population, many of whom speak a language that is based on French.
- Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
- Factor 4 – Resources: WMTS has “I Speak” language Identification cards on its buses. About 2.4% of WMTS’ ridership consists of Somalis. Many of the rides for Somalis are arranged through Child Development Services, Catholic Charities or Lutheran Services, whose staff serve as translators.

Region 8

York County Community Action Corporation (YCCAC)

- Factor 2 – Frequency of Contact: Once every two months or so, there are one or more riders who do not speak English well.
- Factor 3 – Importance of Program: The service is presumed to be very important to LEP persons who use it.
- Factor 4 – Resources: YCCAC has “I Speak” language Identification cards on its buses. YCCAC has a contract with Pacific Interpreters / Language Line Solutions, for 3-way telephone interpreter services. YCCAC also utilizes family members, social service groups, family-based organizations and medical providers to provide translator services when appropriate.