



Maine Department of Transportation

Language Assistance Plan

for Limited English Proficiency

Four Factor Analysis 2023

PURPOSE AND HISTORY

In 1964, the US Department of Labor enacted legislation, Title VI of the Civil Rights Act, stating “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.”

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

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

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

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

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

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

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

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

The four factors considered in the analysis are:

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

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

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

Safe Harbor Stipulation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In **Appendix IV**, we have provided the Primary Language List from the US Census which details the specific languages that could be included in the three “Other” language groups/clusters identified by the U.S. Census for the State of Maine. The Primary Language List from the U.S. Census can also be accessed at this link: [primary language list.pdf \(census.gov\)](https://www.census.gov/data/tables/2010/special/acs/primary-language-list.pdf).

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

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

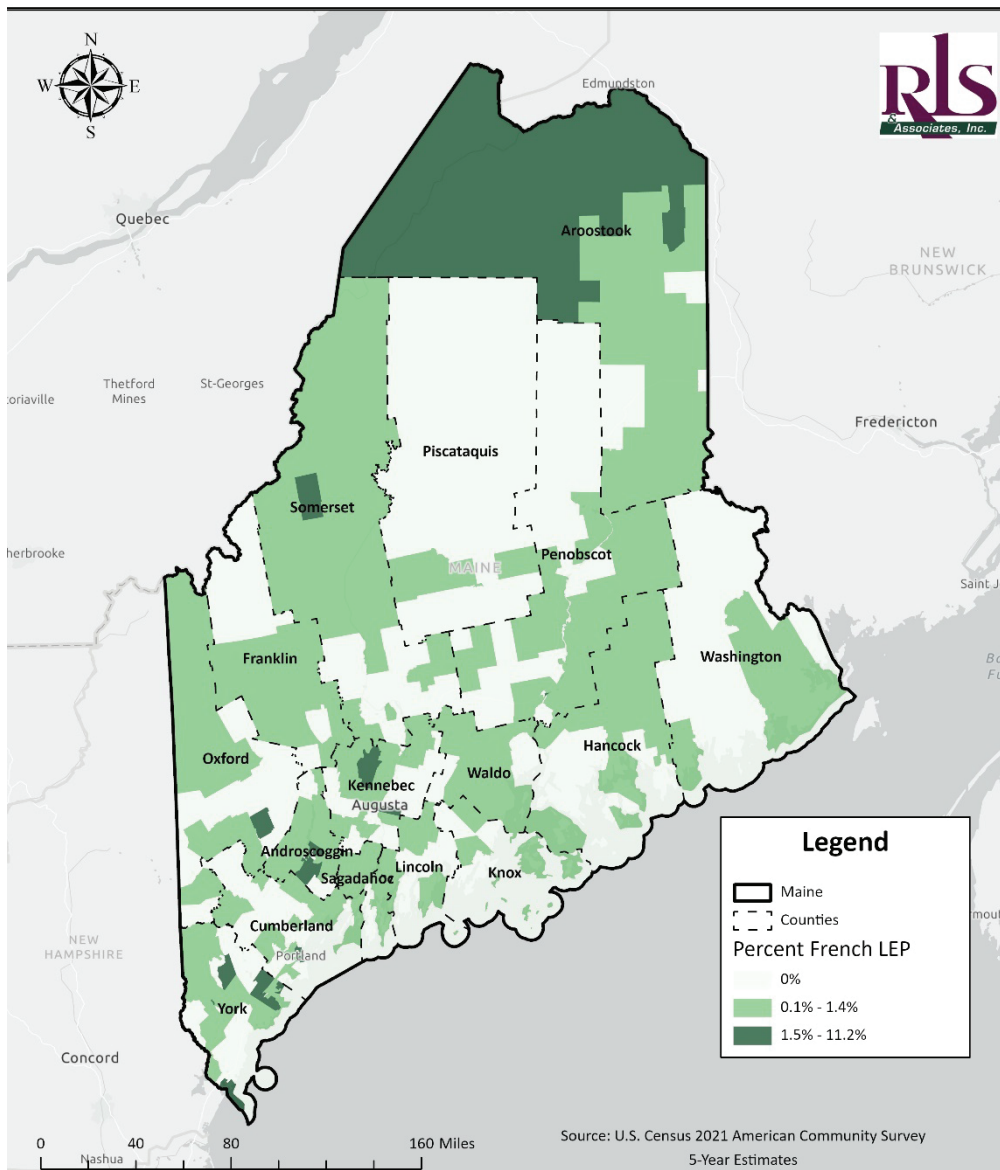
Source: <https://acutrans.com/top-10-languages-of-maine/>

French

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

FIGURE 1.

Census Tracts Percent French Speakers with LEP

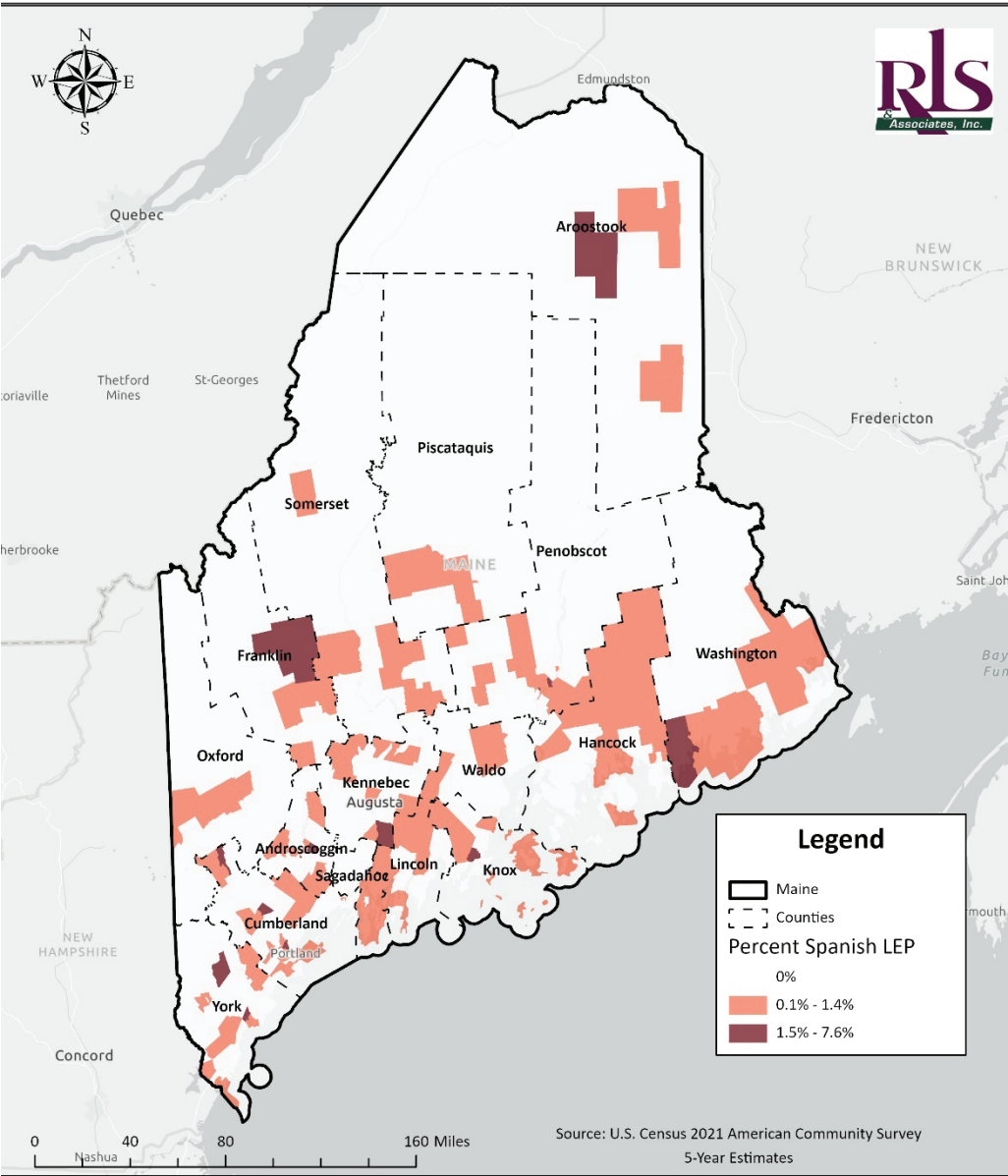


Spanish or Spanish Creole

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

FIGURE 2.

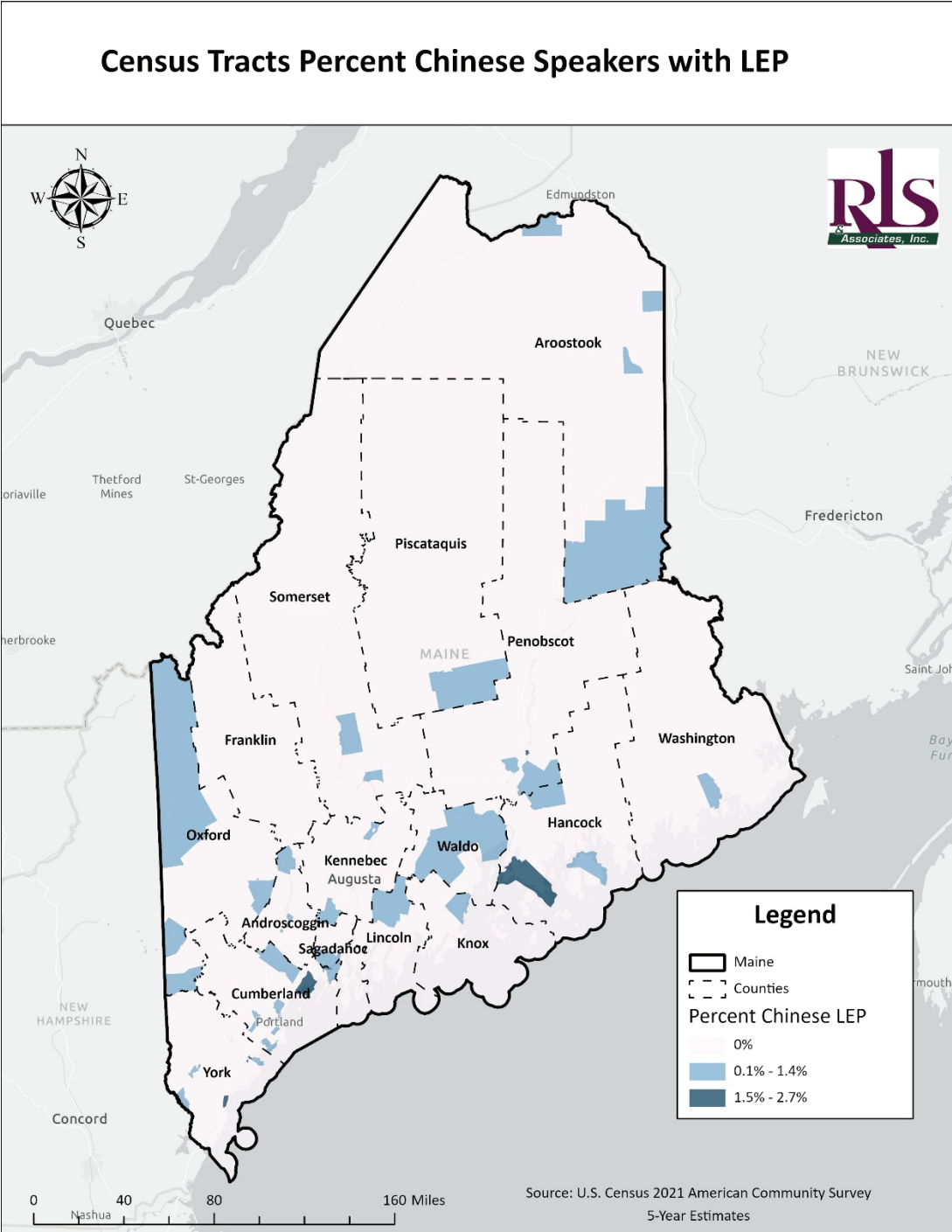
Census Tracts Percent Spanish Speakers with LEP



Chinese

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

FIGURE 3.



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

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

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

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

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

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

Summary of MaineDOT Survey of Subrecipients for Factor 2:

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

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

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

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

Region 1

Aroostook Regional Transportation Systems, Inc (ARTS) provides demand-response transportation services in Aroostook County, the largest American county by land area east of the Mississippi River with a population density of 11 people per square mile, including 1,799 French-speaking LEP persons. ARTS had a single survey

respondent who was not a driver, who indicated that they come into contact with approximately 1–10 LEP individuals in the average week through telephone, email and fax communications. As the respondent is not a driver, no conclusion can be made with regard to the location of the highest LEP ridership in Aroostook County.

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

Region 2

Zero:

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

1–10:

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

11–20:

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

Region 3

Zero:

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

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

1–10:

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

21–30:

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

Region 4

KVCAP had 53 respondents, broken down as follows.

Zero:

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

Undetermined:

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

1–10:

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

11–20:

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

21–30:

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

Region 5

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

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

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

1–10:

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

Region 6

Zero:

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

1–10:

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

11–20:

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

21–30:

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

31–40:

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

41–50:

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

Region 7

Zero:

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

1–10:

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

11–20:

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

31–40:

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

Region 8

Zero:

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

1–10:

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

11–20:

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

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

In summary,

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

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

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

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

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

Region 1

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

Region 2

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

Region 3

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

Region 4

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

Region 5

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

Region 6

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

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

Region 7

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

Region 8

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

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

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

FACTOR 4: THE RESOURCES AVAILABLE TO THE RECIPIENT AND COSTS

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

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

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

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

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

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

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

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

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

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

CONCLUSION

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

RECOMMENDATIONS

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

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

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

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

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