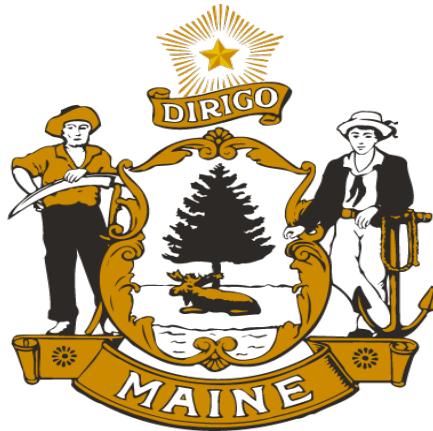




MaineDOT

FHWA TITLE VI IMPLEMENTATION PLAN FFY2027

Submitted by: Sherry Y. Tompkins, Director, Civil Rights Office October 1, 2026

Table of Contents

I.	INTRODUCTION	6
II.	NOTICE	7
III.	LEGAL AUTHORITIES AND APPLICABLE REQUIREMENTS	8
	Federal Statutes and Regulations	8
	U.S. Department of Transportation and Federal Highway Administration Authorities	8
	Executive Orders	8
	MaineDOT Policies and Procedures	9
IV.	TITLE VI STANDARD ASSURANCES	9
V.	NONDISCRIMINATION POLICY STATEMENT	9
VI.	APPLICABILITY	10
VII.	TITLE VI INFORMATION	10
VIII.	EXECUTIVE APPROVAL	10
IX.	ANNUAL GOALS AND ACCOMPLISHMENTS	11
X.	FEDERAL COORDINATION	11
XI.	REVIEW AND UPDATE OF THE TITLE VI PROGRAM	12
XII.	IMPLEMENTATION RESOURCES	12
XIII.	TITLE VI IN CONTRACTING AND PROCUREMENT	13
XIV.	TITLE VI IN PUBLIC SERVICES AND PROGRAM DELIVERY	13
XV.	ORGANIZATION AND STAFFING	13
	MaineDOT Title VI Contacts:	14
	Title VI Coordinator Duties	16
	Title VI Specialist Duties	16
	Internal Title VI Liaison Duties	18
XVI.	TITLE VI PROGRAM MONITORING	18
XVII.	COMPLIANCE REVIEWS AND ENFORCEMENT	19
XVIII.	INTERNAL PROGRAM REVIEW PROCEDURES	19
	Outreach and Public Involvement	19
	Quarterly Reporting	20
	Program Areas	21
	Title VI Liaisons & Internal Monitoring Program	21
	Title VI Responsibilities	22
	Bureau of Planning	22
	Regional Planning – Tribal Liaison	22
	Bureau of Project Development	22
	Contracts Office	22
	Property Office	23
	Multimodal Program	23

Contract Procurement Office	23
Bureau of Maintenance and Operations	23
Environmental Office.....	23
Traffic Engineering.....	23
Americans with Disabilities Act (ADA) Program.....	23
Procedure.....	23
Methodology.....	24
Program Area Reviews	24
Internal Program Review Questionnaire.....	24
Corrective Action	25
Annual Title VI Plan and Accomplishments.....	25
XIX. SUBRECIPIENT REVIEW AND COMPLIANCE PROCEDURES.....	25
Assurances and Contractual Requirements	25
Pre-award and Ongoing Compliance	26
Subrecipient Reviews	26
Subrecipient Review Checklist	27
Subrecipient Title VI Compliance Assessment.....	27
Identification and Correction of Noncompliance	27
Subrecipient Title VI Requirements	28
XX. DATA COLLECTION AND ANALYSIS	28
Overview	28
Data Collection Responsibilities	28
Civil Rights Office	28
Property Office	29
Environmental Planning	29
Statewide Planning.....	29
Language Assistance	29
Public Involvement	29
Data Reporting	30
Data Analysis	30
XXI. RECORDKEEPING AND DOCUMENTATION	30
XXII. TITLE VI TRAINING.....	31
Internal Training	31
External Training	32
XXIII. COMPLAINT PROCEDURES	32

Who May File?	32
Where May a Complaint Be Filed?	33
When Must a Complaint Be Filed?	33
What Should a Complaint Contain?	33
How Are Complaints Routed?	34
Complaint Log	34
FHWA Complaint Processing	35
Investigation Timeframes	35
Confidentiality and Records.....	35
Complaint Contacts	36
Federal Highway Administration	36
U.S. Department of Justice	36
MaineDOT Discrimination Complaint Form	36
XXIV. DISSEMINATION OF TITLE VI INFORMATION	37
Public Participation.....	37
Public Notice and Access to Title VI Information	37
Notification to Beneficiaries - Website	37
XXV. REVIEW OF MAINEDOT DIRECTIVES.....	38
XXVI. LANGUAGE ASSISTANCE	38
Purpose	38
Language Assistance	38
Oral Language Assistance	39
Written Translation	39
Identification of Language Assistance Needs.....	39
Public Information.....	40
Responsibilities	40
Monitoring and Review	40
LIST OF APPENDICES	42
APPENDIX I:	43
STANDARD USDOT TITLE VI ASSURANCES.....	43
Statutory/Regulatory Authorities	44
General Assurances	44
Specific Assurances	45
APPENDIX II:	57
MAINEDOT NONDISCRIMINATION POLICY STATEMENT	57
APPENDIX III:	59
MAINEDOT ORGANIZATIONAL CHART	59

APPENDIX IV:.....	61
LIAISONS COMPLIANCE REVIEW QUESTIONNAIRES	61
APPENDIX V:.....	93
SUBRECIPIENT CHECKLIST	93
APPENDIX VI:.....	97
SUBRECIPIENT TITLE VI COMPLIANCE ASSESSMENT TOOL	97
APPENDIX VII:.....	102
RIGHT-OF-WAY ANONYMOUS DEMOGRAPHIC SURVEY	102
APPENDIX VIII:.....	104
DISCRIMINATION COMPLAINT FORM.....	104

I. INTRODUCTION

The Maine Department of Transportation (MaineDOT) is committed to ensuring nondiscrimination in the administration and delivery of its federally assisted programs and activities. Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

MaineDOT receives Federal financial assistance from the U.S. Department of Transportation (USDOT), including the Federal Highway Administration (FHWA), and administers Federal-aid highway programs subject to Title VI, 49 CFR Part 21, and 23 CFR Part 200. MaineDOT also complies with other applicable Federal nondiscrimination requirements, including the prohibition of discrimination on the basis of sex applicable to Federal-aid highway programs under 23 U.S.C. § 324 and 23 CFR Part 200.

This Title VI Implementation Plan establishes the framework through which MaineDOT administers its FHWA Title VI Program. The Plan describes MaineDOT's organizational structure, policies, procedures, and responsibilities for implementing and monitoring compliance with applicable Federal Title VI and related nondiscrimination requirements.

The Plan is reviewed and updated as necessary to reflect changes in Federal requirements, MaineDOT programs, and organizational responsibilities. MaineDOT will submit its updated Title VI Implementation Plan to FHWA in accordance with 23 CFR § 200.9. October 1 is the annual submission date for the updated implementing plan.

Questions regarding MaineDOT's Title VI Program may be directed to:

Sherry Y. Tompkins, Director, Civil Rights Office

Maine Department of Transportation

Phone: (207) 624-3066

TTY Users: Maine Relay 711

Email: sherry.tompkins@maine.gov

Mail: Civil Rights Office, MaineDOT Headquarters

16 State House Station

Augusta, ME 04333-0016

II. NOTICE

If the information contained in this Title VI Implementation Plan is needed in another language, please contact the Maine Department of Transportation Title VI Specialist at 207-624-3056 or 207-624-3020, TTY users dial Maine Relay 711, or via email mary.bryant@maine.gov.

Si la información contenida en este Plan de no discriminación del Título VI se necesita en otro idioma, comuníquese con el especialista del Título VI del Departamento de Transporte de Maine al 207-624-3056 o 207-624-3020, Los usuarios de TTY marcan Maine Relay 711 o por correo electrónico mary.bryant@maine.gov.

Si vous avez besoin des informations contenues dans ce Plan de non-discrimination en conformité aux dispositions de la réglementation « Titre VI » dans une langue différente, veuillez contacter le spécialiste du Titre VI du département des transports du Maine au numéro 207-624-3056 ou 207-624-3020 Les utilisateurs ATS composent le Maine Relay 711 ou par email mary.bryant@maine.gov.

如有人需要此“第六章不歧视计划”(Title VI Implementation Plan) 的另一种语言的版本，请拨打电话207-624-3056或207-624-3020 联系缅因州交通部的第六章专员 TTY 用户拨打缅因州中继 711或通过电子邮件 mary.bryant@maine.gov

Haddii macluumaadka ku jira Qodobkan VI ee Qorshaha Kala-takoor La'aanta loogu baahan yahay luqad kale, fadlan kala xidhiidh Khabiirka Qodobka VI ee Waaxda Gaadiidka Maine telefoonka 207-624-3056 ama 207-624-3020Isticmaalayaasha TTY waxay garaacaan Maine Relay 711 ama iimaylka mary.bryant@maine.gov.

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

أو عبر البريد الإلكتروني Maine Relay 711 لمستخدمي أجهزة الهاتف النصية، اتصل برقم

mary.bryant@maine.gov .

III. LEGAL AUTHORITIES AND APPLICABLE REQUIREMENTS

This Title VI Implementation Plan is administered in accordance with applicable Federal statutes, regulations, Executive Orders, U.S. Department of Transportation directives, Federal Highway Administration guidance, and applicable MaineDOT policies and procedures, including the following:

Federal Statutes and Regulations

- **42 U.S.C. §§ 2000d–2000d-7**, Title VI of the Civil Rights Act of 1964
- **23 U.S.C. § 324**, Prohibition of Discrimination on the Basis of Sex
- **23 CFR Part 200**, Title VI Program and Related Statutes, Implementation and Review Procedures
- **49 CFR Part 21**, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, including § 21.11.
- **23 CFR §§ 450.210** and **450.316**, concerning public involvement in statewide/nonmetropolitan transportation planning and metropolitan transportation planning, as applicable.
- **49 CFR Part 24**, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs, as applicable to MaineDOT Property functions.

U.S. Department of Transportation and Federal Highway Administration Authorities

- **U.S. Department of Transportation Order 1000.12D**, *The U.S. Department of Transportation Title VI Program*, effective August 26, 2026.
- **Federal Highway Administration, Title VI Implementation Plan Checklist**, for Title VI program elements under 23 CFR § 200.9.
- **Federal Highway Administration, Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964**, Office of Civil Rights.
- **U.S. Department of Transportation, 2026 final rule amending 49 CFR Part 21**, concerning disparate-impact liability.

Executive Orders

- **Executive Order 14281**, *Restoring Equality of Opportunity and Meritocracy*, April 23, 2025.
- **Executive Order 14173**, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*,

January 21, 2025.

- **Executive Order 14224**, *Designating English as the Official Language of the United States*, March 1, 2025.

MaineDOT Policies and Procedures

- **MaineDOT, Public Involvement in Transportation Decision Making**, as applicable to MaineDOT public involvement activities.
- MaineDOT Title VI Standard Assurances, Nondiscrimination Policy Statement, and applicable Title VI procedures and program documents, as incorporated into this Plan and its appendices.

IV. TITLE VI STANDARD ASSURANCES

MaineDOT maintains and implements Title VI Standard Assurances to ensure that federally assisted programs and activities are administered and conducted in accordance with Title VI of the Civil Rights Act of 1964 and applicable Federal nondiscrimination requirements.

MaineDOT's Title VI responsibilities include preventing intentional discrimination on the basis of race, color, and national origin in the administration and delivery of federally assisted programs and activities. MaineDOT also implements the separate Federal-aid highway prohibition against discrimination on the basis of sex under 23 U.S.C. § 324 and 23 CFR Part 200.

MaineDOT implements these responsibilities through program-area monitoring and review, Title VI training for applicable State program and civil rights officials, dissemination of Title VI information, oversight of applicable recipients and subrecipients, data collection and reporting, and established procedures for receiving and referring Title VI complaints.

Copies of MaineDOT's Title VI Standard Assurances are available on the MaineDOT website and are included in **Appendix I** of this Plan.

V. NONDISCRIMINATION POLICY STATEMENT

MaineDOT is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964 and applicable Federal and State nondiscrimination requirements.

MaineDOT incorporates Title VI nondiscrimination requirements into the administration and delivery of its federally assisted programs and activities, including transportation planning, project development, contracting, public involvement, and the provision of services. MaineDOT maintains

procedures for implementing, monitoring, and enforcing applicable nondiscrimination requirements and provides information and training to employees and other responsible parties as appropriate.

A copy of the MaineDOT Nondiscrimination Policy Statement is provided in **Appendix II** of this Plan.

VI. APPLICABILITY

This Title VI Implementation Plan applies to MaineDOT's administration of programs and activities receiving Federal financial assistance from FHWA, including applicable recipients and subrecipients participating in FHWA-assisted programs and activities administered through MaineDOT.

For purposes of this Plan, a recipient or subrecipient is an entity that receives Federal financial assistance, directly or indirectly, to carry out a program or activity subject to applicable Federal nondiscrimination requirements.

MaineDOT maintains separate Title VI requirements and procedures, as applicable, for programs and activities funded by other USDOT Operating Administrations. Requirements applicable to those programs are administered in accordance with the requirements of the Federal agency providing the assistance.

VII. TITLE VI INFORMATION

MaineDOT's Title VI information, including applicable plans, policies, and program materials, is available through the MaineDOT Civil Rights Office, online at: [MaineDOT Title VI Information](#)

Information may also be obtained by contacting:

Maine Department of Transportation
Civil Rights Office
16 State House Station
Augusta, Maine 04333-0016

Phone: (207) 624-3066
TTY Users: Maine Relay 711

VIII. EXECUTIVE APPROVAL

This Title VI Implementation Plan has been reviewed and approved by the Commissioner of the Maine Department of Transportation.

The Civil Rights Office develops and maintains the Plan in coordination with the Commissioner and applicable MaineDOT program areas to ensure that it reflects current Federal Title VI requirements and MaineDOT's organizational responsibilities.

MaineDOT submits the updated Plan to FHWA in accordance with 23 CFR § 200.9. FHWA reviews the Plan in accordance with applicable FHWA procedures.

IX. ANNUAL GOALS AND ACCOMPLISHMENTS

MaineDOT will prepare an annual report documenting Title VI accomplishments for the preceding year and goals for the upcoming year in accordance with 23 CFR § 200.9.

The annual report will include, as applicable:

1. Title VI program-area reviews completed during the preceding year;
2. Subrecipient reviews completed during the preceding year;
3. Title VI training and technical assistance provided;
4. Complaints received and their disposition or referral status, as applicable;
5. Corrective actions and compliance activities;
6. Applicable data collection and reporting activities; and
7. Goals and planned Title VI activities for the upcoming year.

Goals for the upcoming year will identify planned Title VI activities, including applicable program-area and subrecipient reviews and training.

The Title VI Specialist prepares the annual Goals and Accomplishments Report for review and submission through the Civil Rights Office.

X. FEDERAL COORDINATION

The Civil Rights Office serves as MaineDOT's principal point of coordination with FHWA concerning administration of the Department's Title VI Program.

MaineDOT will provide FHWA with the information and documentation required by applicable Federal requirements and FHWA procedures.

The Civil Rights Office will coordinate responses to FHWA requests concerning MaineDOT's Title VI Program and will maintain documentation of required submissions and FHWA correspondence. MaineDOT will provide information/documentation required by FHWA.

XI. REVIEW AND UPDATE OF THE TITLE VI PROGRAM

The Civil Rights Office will review MaineDOT's Title VI Program annually and when significant changes occur in Federal requirements, MaineDOT programs, organizational responsibilities, or applicable Federal guidance. The annual review of MaineDOT's Title VI Program will include consideration of the results of the annual reviews of pertinent program areas and special emphasis program areas required by 23 CFR § 200.9.

The review will consider:

- Changes to Title VI statutes and regulations;
- Changes to USDOT or FHWA requirements;
- Changes to DOT Order 1000.12D or subsequent applicable Title VI directives;
- Results of program-area and subrecipient reviews;
- Complaints and complaint referrals;
- Corrective actions;
- Applicable data collection and reporting;
- Language assistance information;
- Training activities; and
- Other information relevant to administration of the Title VI Program.

MaineDOT will revise this Implementation Plan when necessary to maintain compliance with applicable Federal requirements.

XII. IMPLEMENTATION RESOURCES

MaineDOT maintains implementation resources to support administration of its Title VI Program. These resources include, as applicable:

- Title VI Standard Assurances;
- Nondiscrimination Policy Statement;
- Internal Liaison Compliance Review Questionnaire;
- Subrecipient Title VI Checklist;
- Subrecipient Title VI Compliance Assessment Tool;
- Subrecipient Title VI Implementation Plan Template;
- Language Access materials;
- Title VI complaint procedures and complaint form; and
- Title VI training and informational materials.

These resources are maintained by the Civil Rights Office and are reviewed and updated when necessary to reflect current Federal requirements.

The resources are implementation tools and do not establish requirements beyond those applicable under Federal law, regulation, Federal directives, or applicable FHWA requirements.

XIII. TITLE VI IN CONTRACTING AND PROCUREMENT

MaineDOT incorporates applicable Title VI nondiscrimination requirements into Federal-aid contracts, agreements, and procurement instruments.

MaineDOT's contracting and procurement processes shall provide that applicable contractors, consultants, and other parties performing work under Federal financial assistance comply with applicable Title VI requirements.

The Contract Procurement Office and other responsible program areas shall provide Title VI-related contract and procurement information requested by the Civil Rights Office for program monitoring, review, or reporting.

Where a Federal-aid contract or agreement requires Title VI provisions to be included in lower-tier agreements or other instruments, MaineDOT will require compliance with the applicable Federal requirements.

XIV. TITLE VI IN PUBLIC SERVICES AND PROGRAM DELIVERY

MaineDOT program areas are responsible for administering federally assisted programs and activities without discrimination on the basis of race, color, or national origin.

Program areas shall provide services, benefits, information, opportunities for participation, and other program activities in accordance with applicable Title VI requirements.

MaineDOT will monitor program administration through its internal review process, complaint procedures, program-area information, applicable data, and other information available to the Department.

When a program area identifies a Title VI concern, it shall promptly notify the Civil Rights Office and provide information necessary for the Department to evaluate and address the matter.

XV. ORGANIZATION AND STAFFING

MaineDOT shall provide sufficient staffing and resources to effectively administer the Department's Title VI Program in accordance with applicable Federal requirements. The MaineDOT Title VI

Program is administered through the Civil Rights Office under the leadership of the Civil Rights Office Director, who serves as MaineDOT's Title VI Coordinator.

The Title VI Coordinator has direct access to the Commissioner of MaineDOT and is responsible for overall administration and oversight of the Department's Title VI Program. The organizational placement of the Title VI Coordinator is shown in the Organizational Chart in **Appendix III**.

The Civil Rights Office administers the Title VI Program under the direction of the Chief Legal Counsel and coordinates Title VI implementation, required plans and assurances, program-area reviews, subrecipient reviews, training, reporting, data collection, dissemination of information, and complaint referral procedures.

MaineDOT has designated Title VI Liaisons within applicable program areas. Title VI Liaisons provide information and assistance to the Civil Rights Office concerning Title VI activities and matters within their respective areas of responsibility.

Program-area personnel provide information and documentation requested by the Civil Rights Office concerning federally assisted programs, projects, contracts, agreements, and other activities within their areas of responsibility.

The Civil Rights Office coordinates and documents the Department's annual Title VI reviews. Program-area officials provide information and participate in reviews within their respective areas of responsibility. Title VI Liaisons do not conduct independent Title VI compliance reviews or make independent Title VI compliance determinations.

MaineDOT Title VI Contacts:

Commissioner: Dale F. Doughty
(207) 624-3003
dale.doughty@maine.gov

Chief Legal Counsel: Anne M. Paré
(207) 624-3020
anne.m.pare@maine.gov

Civil Rights Office Director: Sherry Y. Tompkins (Title VI Coordinator)
(207) 624-3066
sherry.tompkins@maine.gov

EEO Specialist: Mary Bryant (Title VI Specialist & DBE Program Administrator)
(207) 624-3056
mary.bryant@maine.gov

EEO Specialist:

Amy McCann (EEO Contractor Compliance, OJT
Administration, Labor Compliance)
(207) 624-3065
amy.mccann@maine.gov

Internal Liaisons:

Jennifer Grant, Director, Bureau of Planning
(207) 624-3227
jennifer.grant@maine.gov

Jarod Farn-Guillette, Regional Planning Tribal Liaison
(207) 215-9558
jarod.farn-guillette@maine.gov

George Macdougall, Contracts & Specifications Engineer
(207) 624-3353
george.macdougall@maine.gov

Heath Cowan, Director, Property Office
(207) 624-3350
heath.cowan@maine.gov

Armand Paradis, LPA Coordinator, Multimodal Operations
(207) 530-0938
armand.j.paradis@maine.gov

Erin Binghamlib, Director, Contract Procurement Office
(207) 624-3324
erin.binghamlib@maine.gov

Robert McFerren, Director, Bureau of Maintenance and Operations
(207) 624-3143
robert.mcferren@maine.gov

David Gardner, Director, Environmental Office
(207) 592-2471
david.gardner@maine.gov

Jeffrey Pulver, Assistant State Traffic Engineer
(207) 624-3305
Jeffrey.pulver@maine.gov

Theresa Savoy, Director, ADA Program
(207) 624-3238
theresa.savoy@maine.gov

Damian Veilleux, Virtual Public Involvement Coordinator, Project

Development
(207) 624-3228
damian.j.veilleux@maine.gov

****TTY users dial Maine Relay 711***

Title VI Coordinator Duties

The Title VI Program Coordinator provides leadership, coordination, and oversight of MaineDOT's Title VI Program and serves as the primary point of coordination between the Civil Rights Office, MaineDOT program areas, and FHWA regarding Title VI matters. The Title VI Program Coordinator shall:

- Maintain a Civil Rights Office responsible for carrying out the objectives of MaineDOT's Title VI Program.
- Maintain procedures necessary to implement applicable Federal Title VI requirements.
- Coordinate the development and maintenance of MaineDOT's Title VI Implementation Plan and required Title VI reports.
- Establish and administer procedures for Title VI program-area reviews.
- Establish and administer procedures for Title VI reviews of applicable recipients and subrecipients.
- Establish procedures for receiving, documenting, and referring Title VI complaints.
- Establish procedures for collecting applicable statistical data.
- Review MaineDOT directives, in coordination with appropriate program officials, and include applicable Title VI and related requirements where appropriate.
- Conduct or coordinate training programs on Title VI and related statutes for applicable State program and civil rights officials.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Establish procedures to address discrimination when identified through applicable Title VI program reviews or other authorized compliance processes. Establish procedures for promptly resolving deficiencies and documenting required remedial action.
- Coordinate the submission of MaineDOT's annual Title VI accomplishments and goals report and updated Title VI Implementation Plan to FHWA.

These duties reflect the State highway agency responsibilities identified in 23 CFR § 200.9.

Title VI Specialist Duties

The Title VI Specialist administers and monitors MaineDOT's Title VI Program and serves as a subject-matter resource on Title VI requirements. The Specialist provides technical expertise and programmatic guidance to the Civil Rights Office Coordinator and works collaboratively with Title VI

Liaisons, program-area officials, and other Department personnel to promote consistent implementation of Title VI requirements throughout MaineDOT's programs and activities. The Title VI Specialist shall:

- Administer and monitor the implementation of MaineDOT's Title VI Program in accordance with applicable Federal and Departmental requirements.
- Initiate, coordinate, and monitor Title VI activities and provide technical and programmatic guidance to MaineDOT personnel, Title VI Liaisons, and applicable recipients of Federal-aid highway funds.
- Review and evaluate Federal Title VI statutes, regulations, Executive Orders, U.S. Department of Transportation and FHWA policies, and related guidance, and provide technical guidance to the Civil Rights Office Coordinator and appropriate Department personnel regarding their application to MaineDOT programs and activities.
- Advise the Civil Rights Office Title VI Coordinator and appropriate Department personnel regarding Title VI compliance matters, emerging issues, and allegations or complaints of discrimination.
- Prepare, maintain, and update MaineDOT's Title VI Implementation Plan, including coordinating information and input from Department program areas and Title VI Liaisons.
- Prepare MaineDOT's Annual Goals and Accomplishments Report, documenting Title VI accomplishments for the preceding year and establishing goals and activities for the upcoming year.
- Coordinate the development, maintenance, and implementation of MaineDOT's Title VI policies, procedures, and program materials.
- Conduct and coordinate annual Title VI reviews of all pertinent program areas, including special emphasis program areas, in collaboration with program-area officials and Title VI Liaisons, and monitor follow-up on identified compliance concerns and corrective actions.
- Provide technical assistance and policy guidance concerning Title VI requirements to MaineDOT personnel and, as appropriate, local public agencies, consultants, contractors, metropolitan and regional planning organizations, and other recipients of Federal-aid highway funds.
- Coordinate the Department's Title VI complaint procedures, including intake, documentation, tracking, and appropriate routing of complaints in accordance with applicable Federal and Departmental requirements.
- Develop and coordinate Title VI information and materials for internal and external audiences, including providing information in other languages when appropriate to serve individuals with language access needs.
- Review Department policies, directives, procedures, and other materials for Title VI considerations and recommend revisions when necessary to maintain compliance with applicable requirements.
- Identify and communicate emerging Title VI compliance issues and recommend appropriate corrective or preventive actions to the Civil Rights Office Coordinator and responsible program officials.

Internal Title VI Liaison Duties

The Title VI Liaisons assist in the implementation of MaineDOT's Title VI Program within their respective Bureaus and Offices. The Liaisons work with the Title VI Specialist and appropriate program personnel to support compliance with applicable Federal and Departmental Title VI requirements. The Liaisons' responsibilities within their respective Bureaus and Offices include:

- Providing information to the Civil Rights Office concerning Title VI activities and accomplishments within their respective Bureaus or Offices for required reporting.
- Providing information and data requested by the Civil Rights Office concerning program activities.
- Disseminating Title VI information as directed or appropriate within their respective areas of responsibility.
- Promptly notifying the Civil Rights Office of allegations or complaints of discrimination received within their respective Bureaus or Offices.
- Providing information concerning language assistance requests and services provided within their respective areas of responsibility.
- Collecting and providing applicable statistical information requested by the Civil Rights Office.
- Providing information or documentation requested by the Civil Rights Office for Title VI administration, reporting, or review activities.

Title VI Liaisons do not conduct independent Title VI compliance reviews and do not make independent Title VI compliance determinations.

XVI. TITLE VI PROGRAM MONITORING

The Civil Rights Office will monitor implementation of MaineDOT's Title VI Program through the procedures established in this Plan.

Monitoring may include:

- Internal program-area reviews;
- Subrecipient reviews;
- Review of Title VI assurances and related documentation;
- Review of complaints and complaint referrals;
- Review of applicable statistical information;
- Review of language assistance information;
- Review of Title VI training activities;
- Review of public dissemination of Title VI information;
- Review of corrective actions; and
- Review of other necessary information to determine whether applicable Title VI requirements

are being implemented.

The Civil Rights Office will use information obtained through monitoring to identify compliance concerns, document corrective action, when necessary, prepare required reports, and update the Title VI Implementation Plan.

XVII. COMPLIANCE REVIEWS AND ENFORCEMENT

MaineDOT conducts annual Title VI reviews of pertinent program areas, including special emphasis program areas, and conducts Title VI reviews of applicable recipients and subrecipients to determine whether federally assisted programs and activities are being administered in accordance with applicable Title VI requirements.

The scope of a review will be appropriate to the program, activity, recipient, or subrecipient being reviewed and may include policies, procedures, records, data, agreements, public information, complaints, language assistance information, and other relevant documentation.

When a review identifies a deficiency, the Civil Rights Office will document the deficiency and communicate the corrective action required.

Prompt action to achieve voluntary compliance shall be the first objective when noncompliance is identified. If voluntary compliance cannot be achieved, MaineDOT will take further action available under applicable Federal requirements.

MaineDOT will monitor corrective action until the deficiency is resolved or otherwise addressed in accordance with applicable Federal requirements.

Where a recipient or subrecipient fails to correct a deficiency, MaineDOT may take additional action available under applicable Federal requirements and the terms of the Federal assistance, including referral to FHWA when appropriate.

Nothing in this section authorizes MaineDOT to conduct an FHWA Title VI complaint investigation that is assigned to FHWA. FHWA Title VI complaints received by MaineDOT are handled in accordance with the complaint-routing procedures established in this Plan.

XVIII. INTERNAL PROGRAM REVIEW PROCEDURES

Outreach and Public Involvement

MaineDOT shall conduct public involvement activities for federally assisted programs and projects in accordance with applicable Federal requirements governing public participation and nondiscrimination.

For Federal-aid highway projects, MaineDOT shall follow applicable FHWA-approved public involvement and public hearing procedures and applicable requirements concerning opportunities for public participation during project development.

MaineDOT shall not exclude a person from participation in, deny a person the benefits of, or otherwise subject a person to discrimination in a federally assisted program or activity on the grounds of race, color, or national origin. MaineDOT's public involvement activities shall be conducted consistent with these nondiscrimination requirements.

Where Federal requirements require public notice, a public hearing, an opportunity for public comment, or other public participation, MaineDOT shall provide the notice and opportunity required by the applicable Federal program requirements.

MaineDOT shall comply with applicable Federal requirements governing consultation with Tribal governments and other governmental entities when those requirements apply to a particular program or project.

Quarterly Reporting

Each Title VI Liaison shall submit a quarterly report to the Civil Rights Office documenting Title VI-related activities and information applicable to the program area during the reporting period.

Quarterly reports shall include, as applicable:

- Title VI information disseminated during the reporting period;
- Title VI-related data or information collected pursuant to applicable Federal requirements;
- Required information concerning language assistance or translation services provided;
- Title VI discrimination complaints received by the program area and information concerning their referral or status; and
- Corrective actions or other actions taken in response to identified Title VI deficiencies, where applicable.

The Civil Rights Office shall collect and review quarterly reports as part of the administration of MaineDOT's Title VI Program.

Quarterly reporting supports MaineDOT's annual Title VI program review and reporting requirements. It does not replace the annual reviews required by 23 CFR § 200.9.

MaineDOT shall prepare the annual Title VI accomplishments and goals report and annually update its Title VI Implementation Plan in accordance with 23 CFR § 200.9.

Program Areas

MaineDOT administers Federal-aid highway programs through multiple program areas. Each program area is responsible for carrying out its assigned functions in accordance with applicable Federal requirements.

For purposes of MaineDOT's Title VI Program, program areas shall provide information and data necessary for the Civil Rights Office to administer, monitor, and report on Title VI requirements.

As applicable, this includes statistical data concerning participants in and beneficiaries of State highway programs, including relocatees, impacted citizens, and affected communities, as required by 23 CFR § 200.9(b)(4).

Program areas shall provide information requested by the Civil Rights Office for administration of MaineDOT's Title VI Program, including information necessary for quarterly reporting, program reviews, the annual Title VI accomplishments and goals report, and the annual update of the Title VI Implementation Plan.

Title VI Liaisons & Internal Monitoring Program

MaineDOT has designated a Title VI Liaison within each applicable program area to serve as a point of contact with the Civil Rights Office for administration of the Department's Title VI Program.

The program areas are:

- A. Bureau of Planning
- B. Regional Planning – Tribal Liaison
- C. Bureau of Project Development
- D. Contracts Office
- E. Property Office
- F. Multimodal Program
- G. Contract Procurement Office
- H. Bureau of Maintenance and Operations
- I. Environmental Office
- J. Traffic Engineering
- K. ADA Program

Title VI Liaisons shall provide information and data concerning Title VI-related activities within their respective program areas and shall identify and communicate Title VI-related questions, complaints, or other matters to the Civil Rights Office.

Liaisons shall provide information requested by the Civil Rights Office for program-area reporting, data collection, annual Title VI accomplishments and goals reporting, and the annual update of MaineDOT's Title VI Implementation Plan.

The Civil Rights Office is responsible for administering MaineDOT's internal Title VI monitoring and review process.

Title VI Responsibilities

Each MaineDOT Internal Title VI Liaison is responsible for providing the Civil Rights Office with information and documentation necessary to support Title VI compliance and reporting for the federally assisted activities administered by their respective unit. On a quarterly basis, each Internal Title VI Liaison shall:

- Provide Title VI-related information and data requested by the Civil Rights Office concerning federally assisted activities administered through the unit.
- Provide information to the Civil Rights Office concerning Title VI assurances and other Title VI documentation, as applicable, required for relevant subrecipients.
- Provide information to the Civil Rights Office concerning Title VI-related public participation activities, language assistance requests, and complaints, as applicable.
- Provide the Civil Rights Office with the information required for quarterly reporting and the annual Title VI Accomplishments and Goals Report.

The following subsections identify the activities conducted by each MaineDOT unit that are relevant to Title VI.

Bureau of Planning

The Bureau of Planning conducts planning, feasibility, and scoping activities for transportation programs and projects and assists with the development of transportation planning documents.

Regional Planning – Tribal Liaison

The Tribal Liaison coordinates MaineDOT's interactions with Tribal governments on transportation planning and project-related matters.

Bureau of Project Development

The Bureau of Project Development is responsible for the development and delivery of transportation projects, including project development, advertising, and award of contracts.

Contracts Office

The Contracts Office is responsible for contract administration activities associated with MaineDOT's transportation projects, including contract awards, contractor payments, project closeout, and related contract documentation.

Property Office

The Property Office performs right-of-way functions, including appraisal and appraisal review, negotiations, relocation, acquisition of real property interests, and related activities.

Multimodal Program

The Multimodal Program administers projects involving non-highway and non-bridge transportation facilities, including projects administered by local public agencies.

Contract Procurement Office

The Contract Procurement Office is responsible for procurement and contract administration activities within MaineDOT.

Bureau of Maintenance and Operations

The Bureau of Maintenance and Operations is responsible for maintenance and operation of MaineDOT's state highway system.

Environmental Office

The Environmental Office is responsible for environmental activities associated with MaineDOT programs and projects, including environmental documentation and related processes.

Traffic Engineering

Traffic Engineering is responsible for traffic data, traffic control devices, traffic-related input on projects, and operation of the Transportation Management Center.

Americans with Disabilities Act (ADA) Program

The ADA Program is responsible for administering MaineDOT's Americans with Disabilities Act requirements and coordinating ADA compliance activities. The program addresses accessibility requirements related to MaineDOT facilities, programs, services, and transportation projects.

Procedure

Title VI Liaisons shall submit quarterly reports to the Civil Rights Office in accordance with the Quarterly Reporting procedures established in this Plan.

The Civil Rights Office shall use information provided by the program areas, together with other information available to the Department, to administer MaineDOT's Title VI Program, conduct applicable internal program-area reviews, and prepare required Title VI reports and plan updates.

Title VI Liaisons shall provide additional information or documentation requested by the Civil Rights Office for purposes of administering MaineDOT's Title VI Program or conducting an internal program-area review.

The Civil Rights Office is responsible for conducting MaineDOT's internal Title VI reviews. Title VI Liaisons do not conduct independent Title VI compliance reviews or make independent determinations of Title VI compliance.

Methodology

MaineDOT administers its Title VI Program through procedures established to meet applicable Federal requirements.

The Civil Rights Office is responsible for administering the Department's Title VI Program, including internal program-area reviews, reviews of applicable recipients and subrecipients, complaint referral procedures, required reporting, data collection, and corrective action.

Program Area Reviews

The Civil Rights Office conducts reviews of special emphasis MaineDOT program areas in accordance with 23 CFR § 200.9. Reviews are used to determine whether program activities are being carried out in accordance with applicable Title VI requirements.

Reviews may include examinations of program policies, procedures, records, data, contracts, agreements, public information, and other documentation relevant to the program area under review. Program areas provide information and documentation requested by the Civil Rights Office.

Internal Program Review Questionnaire

The Civil Rights Office uses an Internal Liaison Compliance Review Questionnaire to obtain and document information from applicable MaineDOT program areas during the Department's Title VI review process.

The questionnaire is a review and documentation tool and does not establish requirements beyond applicable Federal requirements.

A copy of the current Internal Liaison Compliance Review Questionnaire is provided in **Appendix IV**.

Corrective Action

When a deficiency is identified, the Civil Rights Office documents the deficiency and establishes corrective action in accordance with applicable Federal requirements. MaineDOT provides a reasonable period for correction, not to exceed 90 days where required by 23 CFR § 200.9.

Corrective action may include written corrective measures, additional documentation, or other actions necessary to achieve compliance. Matters that cannot be resolved through corrective action may be elevated in accordance with MaineDOT procedures.

Annual Title VI Plan and Accomplishments

The Civil Rights Office prepares the annual report of Title VI accomplishments and goals and the annual update to MaineDOT's Title VI implementing plan for submission to FHWA in accordance with 23 CFR § 200.9.

The results of program area and recipient reviews, complaint processing, data collection, and corrective actions are considered in preparing these required reports and identifying goals for the upcoming year.

XIX. SUBRECIPIENT REVIEW AND COMPLIANCE PROCEDURES

MaineDOT conducts Title VI reviews of applicable recipients and subrecipients of Federal-aid highway funds, including, as applicable, cities, counties, consultant contractors, suppliers, universities, colleges, planning agencies, and other recipients of Federal-aid highway funds.

MaineDOT monitors subrecipients of Federal financial assistance administered through the Department to determine compliance with Title VI and applicable related nondiscrimination requirements. MaineDOT maintains procedures for conducting Title VI reviews of subrecipients, consistent with 23 CFR § 200.9(b)(7) and 49 CFR §§ 21.7, 21.9, and 21.11.

Assurances and Contractual Requirements

MaineDOT requires applicable recipients and subrecipients of Federal financial assistance to provide the assurances and nondiscrimination provisions required by Federal law and the applicable Federal funding program.

MaineDOT incorporates applicable Title VI nondiscrimination requirements into agreements, contracts, and other instruments through which Federal financial assistance is provided or administered, as required by Federal law.

MaineDOT will obtain and maintain required Title VI assurances and related documentation and will make such documentation available for review when required.

MaineDOT program areas shall provide the Civil Rights Office with copies of, or access to, Title VI assurances and nondiscrimination provisions when requested for program administration, monitoring, review, or reporting.

Where a recipient or subrecipient is required to include Title VI requirements in agreements with another entity, MaineDOT will require the recipient or subrecipient to do so in accordance with applicable Federal requirements.

Pre-award and Ongoing Compliance

MaineDOT will consider applicable Title VI compliance requirements when administering Federal financial assistance to recipients and subrecipients.

Before and during the administration of Federal financial assistance, MaineDOT may require information and documentation necessary to determine whether an applicant, recipient, or subrecipient is complying with applicable Title VI requirements.

MaineDOT may review Title VI policies, assurances, complaint procedures, public information, language assistance procedures, records, data, and other documentation relevant to the recipient's or subrecipient's Federal-aid activities.

MaineDOT maintains procedures for pre-grant and post-grant reviews, as applicable, to determine compliance with Title VI requirements.

Where a compliance concern is identified, MaineDOT will document the concern and take appropriate action consistent with applicable Federal requirements and the terms of the Federal assistance.

Subrecipient Reviews

MaineDOT conducts Title VI reviews of subrecipients receiving Federal financial assistance through the Department. Reviews may include a review of the subrecipient's Title VI policies, procedures, records, and other information necessary to determine compliance.

MaineDOT will determine the number and selection of recipients and subrecipients for Title VI review annually based on applicable Federal requirements, the nature and scope of the Federal-aid activities administered, prior compliance information, and other information available to the Department. The Civil Rights Office will document the recipients and subrecipients selected for review as part of the annual Title VI review process.

MaineDOT may require a subrecipient to provide records, reports, and other necessary information to determine compliance with Title VI requirements. Subrecipients shall provide access to pertinent records and information as required to permit MaineDOT to carry out its compliance responsibilities. 49 CFR § 21.9.

MaineDOT maintains documentation of subrecipient reviews and the results of those reviews.

Subrecipient Review Checklist

The Civil Rights Office uses a Subrecipient Checklist to support the administration and documentation of Title VI reviews of applicable subrecipients. The checklist identifies information and documentation considered during the review process and assists the Civil Rights Office in maintaining consistent review documentation.

A copy of the current Subrecipient Checklist is provided in Appendix V.

Subrecipient Title VI Compliance Assessment

The Civil Rights Office uses a Subrecipient Title VI Compliance Assessment Tool to document the evaluation of applicable subrecipient Title VI requirements and the results of the Department's review. The assessment tool supports the documentation of compliance findings and, where applicable, identified deficiencies and corrective actions.

A copy of the current Subrecipient Title VI Compliance Assessment Tool is provided in Appendix VI.

Identification and Correction of Noncompliance

When a review identifies a Title VI deficiency or other instance of noncompliance, MaineDOT notifies the subrecipient of the deficiency and identifies the corrective action required.

MaineDOT will establish and document the remedial action required and the period for correction. Where § 200.9 requires corrective action or resolution within a period not to exceed 90 days, MaineDOT will comply with that requirement.

MaineDOT monitors corrective action until the identified deficiency is resolved and documents the disposition of the review.

If a subrecipient fails to take required corrective action, MaineDOT may take additional action permitted under applicable Federal requirements and the terms and conditions of the Federal award, including referral to FHWA when appropriate.

Subrecipient Title VI Requirements

As a condition of receiving applicable Federal financial assistance through MaineDOT, subrecipients are required to comply with applicable Title VI requirements and provide such information and reports as MaineDOT determines necessary to fulfill its federal compliance responsibilities. 49 CFR §§ 21.7 and 21.9.

MaineDOT requires applicable subrecipients to maintain appropriate Title VI procedures and documentation and to make such information available for review. MaineDOT maintains implementation resources to assist applicable subrecipients in documenting their Title VI procedures and requirements. The Department's Subrecipient Title VI Implementation Plan Template is being reviewed and updated to align with current Federal Title VI requirements, including regulatory changes effective in August 2026. The revised template will be used as appropriate following completion of the Department's compliance review and update process.

MaineDOT's subrecipient oversight procedures are administered in accordance with applicable Federal statutes, regulations, and current U.S. Department of Transportation and Federal Highway Administration requirements.

XX. DATA COLLECTION AND ANALYSIS

Overview

In accordance with 23 CFR § 200.9(b)(4), MaineDOT maintains procedures for the collection of statistical data concerning participants in and beneficiaries of State highway programs, including relocatees, impacted citizens, and affected communities.

MaineDOT collects and uses applicable demographic and other statistical information to meet Federal Title VI and nondiscrimination requirements and to support required Federal reporting and compliance activities.

Data Collection Responsibilities

MaineDOT program areas collect applicable statistical information as part of their respective program activities. The information collected may include race, color, religion, sex, and national origin, and other information where required by applicable Federal law or program requirements.

Civil Rights Office

The Civil Rights Office collects, maintains, and compiles applicable Title VI information provided by MaineDOT program areas for program monitoring and required reporting. This includes information received through Title VI quarterly reporting, complaints, and other program activities.

Property Office

During the interview and intake process, MaineDOT Right-of-Way staff provide affected individuals with an opportunity to voluntarily provide demographic information. Right-of-Way staff also distribute an Anonymous Demographic Survey to relocatees and individuals impacted by right-of-way activities.

The survey collects demographic information for purposes of MaineDOT's Federal statistical data collection and reporting requirements. A copy of the survey is included in **Appendix VII**.

Environmental Planning

The Environmental Office collects applicable demographic information during the environmental review process and, as appropriate, during public meetings conducted as part of its program activities.

Statewide Planning

MaineDOT's statewide transportation planning activities include the collection and analysis of demographic information relevant to the populations affected by transportation plans and programs.

Public involvement conducted as part of the statewide transportation planning process provides opportunities for the public to participate in the development of transportation plans and programs in accordance with applicable Federal requirements.

Language Assistance

MaineDOT maintains information concerning language assistance provided to members of the public. MaineDOT's Title VI quarterly reporting process collects information from applicable Bureaus and Offices concerning written translation and oral language assistance services provided in connection with MaineDOT programs and activities.

The information collected is used for required Title VI program monitoring and reporting and to document language assistance provided by MaineDOT.

Public Involvement

MaineDOT maintains procedures for public involvement in applicable transportation planning and program activities in accordance with Federal requirements.

MaineDOT's Public Involvement Management Application (PIMA) is used to document and manage public comments and other information received through applicable public involvement activities.

PIMA provides a mechanism for recording comments, responses, and related project information and maintaining those records in accordance with applicable MaineDOT record-retention requirements.

Public involvement procedures provide the public with opportunities to obtain information and provide comments during applicable transportation planning and program activities. Public involvement activities are conducted in accordance with applicable Federal requirements for public participation.

Data Reporting

Applicable data collection activities are documented through MaineDOT's Title VI reporting process. Information collected by program areas is used, as applicable, in MaineDOT's annual Title VI accomplishments and goals reporting to FHWA.

MaineDOT maintains records of applicable statistical information and reporting activities in accordance with Federal requirements and MaineDOT procedures.

Data Analysis

MaineDOT reviews applicable data to monitor compliance with Title VI and other applicable Federal nondiscrimination requirements and to identify potential instances of discrimination or other noncompliance.

Where applicable, MaineDOT reviews collected participation and demographic information to assess whether public involvement and outreach methods are providing appropriate opportunities for participation and to identify whether additional outreach methods are warranted.

Statistical differences or disparities, standing alone, do not establish a violation of Title VI.

Where information indicates potential discrimination or other noncompliance, MaineDOT addresses the matter through its applicable Title VI compliance and enforcement procedures.

MaineDOT's data collection and analysis activities are conducted in accordance with applicable Federal statutes, regulations, Executive Orders, and current U.S. Department of Transportation and Federal Highway Administration requirements.

XXI.RECORDKEEPING AND DOCUMENTATION

MaineDOT maintains records necessary to demonstrate administration of its Title VI Program and compliance with applicable Federal requirements.

Records may include, as applicable:

- Title VI assurances;
- Title VI policies and procedures;
- Program area and subrecipient review records;
- Title VI training records;
- Title VI complaints and referral records;
- Statistical and demographic information collected pursuant to applicable Federal requirements;
- Language assistance information;
- Public participation and outreach documentation;
- Corrective action documentation; and
- Annual Title VI accomplishments, goals, and related reporting materials.

MaineDOT maintains records in accordance with applicable Federal and State record-retention requirements and Department procedures.

Program areas and applicable recipients and subrecipients shall provide records requested by the Civil Rights Office when necessary to administer, monitor, or document the Title VI Program.

XXII. TITLE VI TRAINING

Internal Training

MaineDOT provides Title VI training to State program employees and other civil rights officials through the Civil Rights Office. In accordance with 23 CFR § 200.9(b)(9), the MaineDOT Title VI Specialist is responsible for conducting training programs on Title VI and related statutes.

The Title VI Specialist provides Title VI training to applicable MaineDOT program and civil rights officials. Training addresses applicable Title VI requirements and related Federal nondiscrimination requirements, including changes to Federal requirements that affect MaineDOT's Title VI Program.

MaineDOT provides additional Title VI training or instruction when necessary to address changes in Federal requirements, program responsibilities, or identified compliance issues. Newly designated Title VI Liaisons receive initial instruction from the Title VI Specialist regarding their Title VI responsibilities.

MaineDOT also provides Title VI training or briefings to other MaineDOT personnel, as appropriate to their responsibilities and involvement in programs or activities subject to Title VI requirements. Training may be tailored to the functions of the participating staff and the requirements applicable to their program areas.

External Training

MaineDOT provides Title VI training and technical assistance to recipients of Federal-aid highway funds, as appropriate, to support compliance with applicable Title VI requirements.

The Civil Rights Office provides Title VI training opportunities to Local Public Agencies (LPAs) and their consultants. MaineDOT also provides Title VI training or briefings to subrecipients and other recipients of Federal-aid highway funds when appropriate to their responsibilities or when Federal requirements or identified compliance issues warrant additional instruction.

MaineDOT may also extend relevant Title VI training opportunities offered by FHWA or other U.S. Department of Transportation agencies to applicable recipients and program participants.

The Civil Rights Office provides Title VI-related training to MaineDOT personnel involved in construction, project development, program management, and other activities, as appropriate to their responsibilities for implementing or monitoring Federal-aid programs.

MaineDOT maintains records of applicable Title VI training activities in accordance with its reporting and recordkeeping procedures.

XXIII. COMPLAINT PROCEDURES

MaineDOT maintains procedures for receiving, documenting, and referring Title VI complaints concerning programs and activities receiving Federal financial assistance through the Federal-aid highway program.

MaineDOT's procedures are administered consistently with applicable Federal requirements and FHWA complaint-processing procedures.

MaineDOT does not conduct investigations of Title VI complaints that FHWA retains for investigation. When FHWA delegates a Title VI complaint investigation to MaineDOT, MaineDOT will conduct the delegated investigation in accordance with applicable Federal requirements and FHWA instructions.

Title VI complaints received by MaineDOT that fall within FHWA's complaint jurisdiction will be promptly referred to FHWA in accordance with applicable FHWA complaint-processing procedures. MaineDOT will conduct an investigation only when required by applicable Federal requirements or when FHWA delegates an investigation to MaineDOT.

Who May File?

Any person who believes that they, or a specific class of people, have been subjected to discrimination on the basis of race, color, or national origin in a program or activity receiving Federal financial assistance may file a Title VI complaint.

A complaint may be filed by the individual alleging discrimination or by a representative acting on the individual's behalf.

Retaliation against a person because the person filed a complaint or participated in a Title VI investigation is prohibited under 49 CFR § 21.11(e).

Where May a Complaint Be Filed?

A Title VI complaint may be filed with MaineDOT, the FHWA Maine Division Office, the FHWA Headquarters Office of Civil Rights (HCR), the U.S. Department of Transportation Departmental Office of Civil Rights, or the U.S. Department of Justice.

A complainant may file directly with FHWA HCR. Filing a complaint with MaineDOT does not preclude a complainant from filing with the appropriate Federal agency.

When Must a Complaint Be Filed?

Under 49 CFR § 21.11(b), a complaint must be filed not later than 180 days after the date of the alleged discrimination, unless the filing period is extended by the Secretary of Transportation.

What Should a Complaint Contain?

Complaints should be submitted in writing and signed by the complainant or the complainant's representative. A complaint should contain sufficient information to permit the allegations to be understood and processed.

A complaint should include, as applicable:

1. A description of what occurred;
2. Contact information for the complainant;
3. The basis of the complaint, such as race, color, or national origin;
4. Identification of the person or persons alleged to have discriminated and the respondent agency, organization, contractor, or other entity, if known;
5. Sufficient information to understand the facts that led the complainant to believe discrimination occurred in a program or activity receiving Federal financial assistance; and
6. The date or dates of the alleged discriminatory act or acts and, if applicable, whether the alleged discrimination is continuing.

A person may contact the MaineDOT Civil Rights Office by telephone to report allegations. When a complaint is received by telephone, the Civil Rights Office may reduce the allegations to writing and provide the written complaint to the complainant for review, correction, and signature.

Use of MaineDOT's Discrimination Complaint Form is not required if a written complaint otherwise provides sufficient information for processing.

How Are Complaints Routed?

MaineDOT does not investigate Title VI complaints that are within the FHWA complaint process. All FHWA Title VI complaints received by MaineDOT are forwarded to FHWA for processing in accordance with FHWA procedures.

FHWA Headquarters Office of Civil Rights determines the appropriate disposition of complaints within FHWA's jurisdiction in accordance with FHWA complaint-processing procedures. FHWA Headquarters Office of Civil Rights is responsible for determining whether a complaint will be accepted, dismissed, or referred to for determining the appropriate disposition of complaints within FHWA's jurisdiction.

Accordingly, complaints are routed as follows:

1. **Complaints received by MaineDOT:** MaineDOT logs the complaint and forwards the complaint to the appropriate FHWA office for processing.
2. **Complaints received by a MaineDOT subrecipient:** The subrecipient forwards the complaint to MaineDOT. MaineDOT logs the complaint and forwards it to FHWA for processing.
3. **Complaints received directly by FHWA:** FHWA processes the complaint in accordance with its complaint processing procedures.
4. **Complaints outside FHWA jurisdiction:** FHWA may refer a complaint to the Federal agency with jurisdiction or otherwise dispose of the complaint in accordance with applicable Federal procedures.

MaineDOT does not make the final determination regarding whether an FHWA Title VI complaint will be accepted, dismissed, or referred.

Complaint Log

MaineDOT maintains a log of Title VI complaints received by the Department.

The complaint log identifies, as applicable:

- The complainant;
- The basis alleged;
- The respondent;
- The nature of the complaint;
- The date the complaint was filed;
- The date the complaint was referred;
- The disposition, when known;

- The date of disposition, when known; and
- Other pertinent information.

MaineDOT maintains complaint records and logs in accordance with applicable Federal and State record-retention requirements.

FHWA Complaint Processing

FHWA Headquarters Office of Civil Rights determines the appropriate disposition of complaints within FHWA's jurisdiction.

Potential dispositions include:

1. **Acceptance:** FHWA determines that the complaint is timely, contains sufficient information to state a claim under applicable Federal requirements, and concerns a matter within FHWA's jurisdiction.
2. **Preliminary Review:** FHWA determines that additional information is necessary before deciding whether to accept, dismiss, or refer the complaint.
3. **Dismissal:** FHWA determines that the complaint should be dismissed based on applicable procedural, jurisdictional, or substantive considerations.
4. **Referral:** FHWA determines that another Federal agency has jurisdiction and refers the complaint to that agency for appropriate action.

FHWA notifies the appropriate parties of its determination in accordance with its complaint-processing procedures.

Investigation Timeframes

There is no regulatory timeframe requiring FHWA to complete an investigation within a specified number of days. FHWA may establish internal timeframes for processing complaints.

MaineDOT does not conduct investigations of FHWA Title VI complaints and therefore does not establish an investigation completion timeframe for such complaints.

Confidentiality and Records

MaineDOT maintains complaint records in accordance with applicable Federal and State records-retention requirements.

Complaint and investigation information is maintained and disclosed in accordance with applicable Federal and State law.

Complaint Contacts

Complaints may be submitted to:

Civil Rights Office
Maine Department of Transportation
16 State House Station
Augusta, ME 04333-0016

Attention: Sherry Y. Tompkins
Telephone: 207-624-3066
Fax: 207-624-3021
TTY Users: Maine Relay 711
Email: sherry.tompkins@maine.gov

Federal Highway Administration

Complaints may also be filed directly with:

Federal Highway Administration
Office of Civil Rights
1200 New Jersey Avenue, SE
Washington, DC 20590

Telephone: 202-366-0693
Fax: 202-366-1599
Email: civilrights.fhwa@dot.gov

U.S. Department of Justice

Complaints may also be filed with:

Federal Coordination and Compliance Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

MaineDOT Discrimination Complaint Form

MaineDOT's Discrimination Complaint Form is provided in **Appendix VIII.**

The form is available through the MaineDOT Civil Rights Office Title VI webpage. Use of the form is not required when a complaint otherwise provides sufficient information for processing.

XXIV. DISSEMINATION OF TITLE VI INFORMATION

Public Participation

In accordance with 23 CFR § 200.9(b)(12), MaineDOT develops and disseminates information concerning Title VI requirements and protections to the general public and, where appropriate, in languages other than English.

MaineDOT incorporates Title VI nondiscrimination requirements into applicable public participation activities. Information regarding Title VI protections, complaint procedures, and available language assistance is made available to participants, beneficiaries, and other interested people.

MaineDOT provides language assistance when appropriate to facilitate access to Title VI information and public participation.

Public Notice and Access to Title VI Information

In accordance with 49 CFR § 21.9(d), MaineDOT makes information concerning its obligations under the USDOT Title VI regulations and the protections afforded by Title VI available to participants, beneficiaries, and other interested people.

MaineDOT disseminates Title VI information through its website, public offices, public meetings, and other appropriate means.

Title VI information includes notice of the right to file a discrimination complaint and information concerning how and where a complaint may be filed.

MaineDOT will review and update publicly available Title VI information when applicable Federal requirements, Department procedures, contact information, plans, or forms change.

Notification to Beneficiaries - Website

MaineDOT maintains Title VI information on its website so that information concerning Title VI protections and complaint procedures is readily available to the public.

The MaineDOT Title VI webpage includes, as applicable:

1. Filing a Discrimination Complaint;
2. Discrimination Complaint Form;
3. Title VI Complaint Procedures;
4. Language Assistance Information;
5. Language Identification Card;
6. Know Your Rights;

7. Nondiscrimination/Title VI Poster;
8. Minority and Outreach Contact Information;
9. FHWA Title VI Implementation Plan;
10. FHWA Title VI Assurances; and
11. Other current Title VI information and forms.

MaineDOT updates the website as Title VI requirements, guidance, plans, forms, and other program information are revised.

XXV. REVIEW OF MAINEDOT DIRECTIVES

The Civil Rights Office reviews draft Administrative Policy Memoranda (APMs) and directives in coordination with appropriate MaineDOT officials.

The review considers whether the proposed directive contains provisions that are inconsistent with applicable Federal Title VI or related nondiscrimination requirements.

Where Title VI or related nondiscrimination concerns are identified, the Civil Rights Office works with the appropriate MaineDOT officials to address those concerns before the directive is finalized.

XXVI. LANGUAGE ASSISTANCE

Purpose

MaineDOT provides language assistance, when appropriate, to individuals who need assistance communicating in English to access MaineDOT programs, services, activities, or information.

MaineDOT's language assistance procedures are maintained as an operational measure to support access to MaineDOT programs, services, activities, and information and to support compliance with applicable Federal nondiscrimination requirements concerning national origin.

Language Assistance

MaineDOT provides language assistance, when appropriate, through oral language assistance and written translation. Language assistance is provided at no cost to the individual.

The type and extent of language assistance provided may depend on the nature of the communication, the circumstances of the interaction, and the resources reasonably available to MaineDOT.

MaineDOT may use qualified bilingual employees, contracted oral language services and written translation services, or other appropriate resources to provide language assistance.

MaineDOT does not require an individual to provide or pay for oral language assistance in order to access MaineDOT programs, services, activities, or information.

Oral Language Assistance

When oral language assistance is needed, MaineDOT may provide assistance through qualified bilingual personnel or professional oral language assistance services.

MaineDOT maintains access to contracted language service providers to provide oral language assistance when appropriate. Staff may use available language identification tools to determine the language assistance needed.

An individual may choose to communicate through a family member, friend, or other person. MaineDOT will provide language assistance when appropriate and will not require an individual to provide their own language assistance as a condition of receiving MaineDOT services.

For communications involving important, complex, or sensitive information, MaineDOT may provide professional oral language assistance to support accurate and effective communication.

Written Translation

MaineDOT provides written translations when appropriate to communicate Title VI information, complaint procedures, and other information necessary to provide access to MaineDOT programs, services, activities, and information.

MaineDOT evaluates requests for translated materials based on the nature of the information, the circumstances in which the information is provided, and the language assistance needs identified by the Department.

MaineDOT may provide translated materials in languages other than English and may provide oral language assistance when written translation is not appropriate or necessary.

Identification of Language Assistance Needs

MaineDOT identifies language assistance needs through information available to the Department, including requests for language assistance, information collected through program activities, and other available demographic or program information.

MaineDOT's program areas report language assistance activities through the Department's Title VI reporting process. This information is used to monitor language assistance needs and the services provided.

Public Information

MaineDOT makes information regarding the availability of language assistance available to the public through its website, public meetings, and other appropriate means.

MaineDOT's Title VI information and complaint procedures are available on the MaineDOT Civil Rights webpage. Language assistance information is provided where appropriate.

Responsibilities

The Civil Rights Office coordinates MaineDOT's language assistance procedures and provides guidance to program areas regarding the availability and use of language assistance resources.

MaineDOT program areas are responsible for identifying language assistance needs encountered in the delivery of their programs, services, and activities and for obtaining appropriate assistance when needed.

Monitoring and Review

MaineDOT monitors language assistance requests and services provided through its Title VI reporting process.

The Civil Rights Office reviews available information concerning language assistance and updates Department procedures and resources as necessary to address identified needs and applicable Federal requirements.

This page has been intentionally left blank.

LIST OF APPENDICES

- APPENDIX I:*** Standard USDOT Title VI Assurances
- APPENDIX II:*** MaineDOT Nondiscrimination Policy Statement
- APPENDIX III:*** MaineDOT Organizational Chart
- APPENDIX IV:*** Liaisons Compliance Review Questionnaires
- APPENDIX V:*** Subrecipient Checklist
- APPENDIX VI:*** Subrecipient Title VI Compliance Assessment Tool
- APPENDIX VII:*** Right-of-Way Anonymous Demographic Survey
- APPENDIX VIII:*** Discrimination Complaint Form

APPENDIX I:

STANDARD USDOT TITLE VI ASSURANCES

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** (herein referred to as "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 non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted **FHWA Program**.

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.2(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 **FHWA Programs** and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*"The **Maine Department of Transportation**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively 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's** 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**. You must keep records, reports, and submit the material for review upon request to **FHWA** or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other

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

Maine Department of Transportation
Dale F. Doughty, Commissioner
(Name of Recipient)

By: 
(Signature of Authorized Official)

Dated: 9-17-26

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, **Federal Aviation Administration (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 all requirements imposed by Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, part 21, Non-discrimination in Federally-assisted Programs of the 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), the Regulations for the Administration of **Federal Aviation Administration (FHWA) 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 **Maine Department of Transportation** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the **Maine Department of Transportation**, its successors and assigns.

The **Maine Department of Transportation**, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or

national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,][and]* (2) that the **Maine Department of Transportation** will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, 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 assigns.*

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

APPENDIX E

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

Pertinent Non-Discrimination Authorities:

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

- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

APPENDIX II:

MAINEDOT NONDISCRIMINATION POLICY STATEMENT

**MAINE DEPARTMENT OF TRANSPORTATION
NONDISCRIMINATION POLICY STATEMENT**

TITLE VI (FHWA)

In accordance with Title VI of the Civil Rights Act of 1964, no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Maine Department of Transportation program or activity on the grounds of race, color, or national origin.

The Maine Department of Transportation conducts its Title VI Program using a team approach, involving personnel from all program areas, with guidance from the Civil Rights Office, which administers the Department's Title VI Program, to ensure the Department's compliance with Title VI implementing regulations.

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

Sherry Y. Tompkins, Director, Civil Rights Office
Maine Department of Transportation
16 State House Station Augusta, ME 04333-0016
Telephone (207) 624-3066
TTY Users: Maine Relay 711
Sherry.tompkins@maine.gov

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



Dale F. Doughty, Commissioner
Maine Department of Transportation

Dated: 23 Sept 26

APPENDIX III:

MAINEDOT ORGANIZATIONAL CHART

Maine Department of Transportation (MaineDOT)

Organizational Chart

Position	Reports To
Dale F. Doughty, Commissioner	
Anne Paré, Chief Legal Counsel	Commissioner
Sherry Y. Tompkins, Director, Civil Rights Office	Commissioner and Chief Legal Counsel
Mary Bryant, EEO Specialist	Civil Rights Office Director
Amy McCann, EEO Specialist	Civil Rights Office Director

APPENDIX IV:

LIAISONS COMPLIANCE REVIEW QUESTIONNAIRES

Maine Department of Transportation

TITLE VI QUARTERLY REPORT

ADA

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 15th**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. TITLE VI / NONDISCRIMINATION ACTIVITIES

1. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this reporting period?

- ☐ Yes
- ☐ No

If yes, briefly describe the matter and indicate whether it was referred to the Civil Rights Office:

2. Describe any Title VI or nondiscrimination program monitoring, review, or other related activities conducted by your program area during this reporting period.

Include the type of activity and, where applicable, the project, program, facility, or process involved.

B. PUBLIC INVOLVEMENT

3. Does written information provided to the public by your program area include the applicable Title VI nondiscrimination language?

- ☐ Yes
- ☐ No

Documentation/Comments:

C. ADA PROGRAM AREA

4. How does the program area identify the need for accessible facilities on the MaineDOT system?

5. Does the program area maintain an inventory of accessible pedestrian facilities:

☐ Yes

☐ No

If no, please explain:

D. TRAINING

6. What nondiscrimination training have ADA employees participated in?

Was this mandatory or voluntary training?

D. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# of ADA non-compliant Public Right-of-Way (PROW) Facilities identified in MaineDOT ADA Transition Plan	
# of ADA non-compliant Public Right-of-Way (PROW) Facilities corrected in MaineDOT ADA Transition Plan	
# of project plans reviewed for ADA compliance	
# of project inspections conducted for ADA compliance	
# of complaints filed with the ADA Coordinator	
# of complete investigations	
# of open informal (verbal) complaints	
# of open formal (written) complaints	
# Language access requests received	
# Language access services provided	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Contracting**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December **(due January 15th)**
- ☐ Quarter 2 – January, February, March **(due April 15th)**
- ☐ Quarter 3 – April, May, June **(due July 15th)**
- ☐ Quarter 4 – July, August, September **(due October 15th)**

A. TITLE VI / NONDISCRIMINATION ACTIVITIES

7. Were any Title VI or nondiscrimination issues, or concerns, or complaints brought to your attention during this reporting period?

- ☐ Yes
- ☐ No

If yes, briefly describe the matter and indicate whether it was referred to the Civil Rights Office:

8. Describe any Title VI or nondiscrimination program monitoring, review, or other related activities conducted by your program area during this reporting period.

9. Provide any special outreach or other Title VI related activities conducted this quarter:

B. CONTRACTING ACTIVITIES

10. Is technical information (bids, RFQs, RFPs, RFIs, prequalification, etc.) available through established Department methods of public dissemination?

- ☐ Yes
- ☐ No

Comments/documentation:

11. Does public information contain applicable Title VI/nondiscrimination language?

☐ Yes

☐ No

Comments/documentation:

12. What documentation is maintained reflecting Title VI related correspondence, training, and other activities?

C. DBE

13. Is DBE participation monitored and reported to the Department's DBE Program Administrator in accordance with applicable DBE procedures?

☐ Yes

☐ No

Describe:

14. Are all contracting opportunities requiring coordination with the DBE Program Administrator communicated in accordance with Department procedures?

☐ Yes

☐ No

Describe:

D. CONTRACT PROCEDURES

15. What actions have been taken to ensure non-discrimination in the contractor/consultant selection process?

Comments:

16. Are applicable contracts reviewed for appropriate Title VI/nondiscrimination language?

- ☐ Yes
☐ No

17. What procedures are in place to ensure nondiscrimination with regard to on-call contracts and prequalification procedures?

Comments:

E. TRAINING

18. What nondiscrimination training have Contracting employees participated in?

Was this mandatory or voluntary training?

F. LANGUAGE ASSISTANCE

19. How is staff trained on how to assist persons who have language assistance needs?

G. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# of contractors trained	
# of consultants trained	
# of residents trained	
# of state employees trained	
# requests received for translation services	
# requests received for language services	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Creative Services Completes regarding public involvement for
Project Development (Highway and Bridge Programs)

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 15th**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

H. TITLE VI / NONDISCRIMINATION ACTIVITIES

20. Were any Title VI or nondiscrimination issues, or concerns, or complaints brought to your attention during this reporting period?

- ☐ Yes
- ☐ No

If yes, briefly describe the matter and indicate whether it was referred to the Civil Rights Office:

21. Describe any Title VI or nondiscrimination program monitoring, review, or other related activities conducted by your program area during this reporting period.

I. PUBLIC INVOLVEMENT

22. Are public involvement activities conducted using appropriate times, locations, and methods to provide interested persons a meaningful opportunity to participate?

- ☐ Yes
- ☐ No

Comments:

23. Are provisions made to provide language assistance or reasonable accommodation, as applicable, when requested in connection with public involvement activities?

☐ Yes

☐ No

Comments:

24. What efforts are made to provide information about public involvement opportunities and encourage participation?

Describe:

25. Does any written information include appropriate Title VI language?

☐ Yes

☐ No

26. What public involvement techniques do you utilize to identify Title VI issues or nondiscrimination concerns as early as possible?

Provide documentation and comments:

27. Are informal open-forum public meetings used, when appropriate to allow individuals an opportunity to provide comments?

☐ Yes

☐ No

J. ACCESSIBILITY

28. What process is used to identify and address potential Title VI or nondiscrimination concerns raised during public involvement?

Describe:

K. DOCUMENTATION

29. Has participation in public meetings and other public involvement activities been documented?

- ☐ Yes
☐ No

30. What documentation is maintained reflecting Title VI related training, public involvement and other activities?

List:

L. STAFF TRAINING

31. What nondiscrimination training have you participated in?

Was this mandatory or voluntary training?

M. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# Webinar public meetings	
# of traditional public meetings	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# requests received for translation services	
# requests received for language services	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

Maine Department of Transportation

TITLE VI QUARTERLY REPORT

Environment

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 15th**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. TITLE VI / NONDISCRIMINATION ACTIVITIES

32. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this reporting period?

- ☐ Yes
- ☐ No

If yes, briefly describe the matter and indicate whether it was referred to the Civil Rights Office:

33. Describe any Title VI or nondiscrimination program monitoring, review, or other related activities conducted by your program area during this reporting period.

Include the type of activity and, where applicable, the project, program, facility, or process involved.

B. PUBLIC INVOLVEMENT

34. Is information regarding project impacts and mitigation measures provided to the public through applicable public meetings, hearings, notices or other public involvement activities?

- ☐ Yes

☐ No

Documentation/Comments:

35. Does written information provided to the public include the applicable Title VI/nondiscrimination language?

☐ Yes

☐ No

Documentation/Comments:

36. Are language assistance services provided when requested or otherwise appropriate for public involvement activities?

☐ Yes

☐ No

Documentation/Comments:

C. DOCUMENTATION

37. Is documentation maintained for Title VI-related correspondence, public involvement activities, training, complaints, and other Title VI/nondiscrimination activities?

☐ Yes

☐ No

If no, please explain:

D. STAFF TRAINING

38. What nondiscrimination training have you participated in?

Was this mandatory or voluntary training?

E. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# Webinar public meetings	
# of traditional public meetings	
# of public meetings or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# of PIPs developed during the reporting period	
# Language requests received and services provided during traditional meetings/hearings	
# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# State Employees trained	
# Federal Employees trained	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Maintenance and Operations**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 23**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. Title VI/Nondiscrimination Activities

1. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to the attention of the program this quarter?

- ☐ Yes
- ☐ No

Explain:

2. Describe Title VI/Non-discrimination Program Monitoring activities you have conducted this quarter.

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

3. Does written public information provided by the program include applicable Title VI/nondiscrimination language?

- ☐ Yes
- ☐ No

Describe:

4. Were any language assistance services requested or provided during this reporting period?

☐ Yes

☐ No

Describe:

C. MAINTENANCE AND OPERATIONS

5. Describe any Title VI/nondiscrimination-related activities, reviews, or concerns involving maintenance and operations activities during this reporting period.

6. Were any actions taken to address Title VI/nondiscrimination concerns related to maintenance or operations activities?

☐ Yes

☐ No

Describe:

D. DOCUMENTATION

7. Is documentation maintained reflecting Title VI related correspondence, complaints, training, monitoring, and other activities?

☐ Yes

☐ No

Describe:

E. Consultant Contracts

8. What actions have been taken this quarter to identify subcontracting/consulting opportunities and solicit interest, bids, or quotes from DBEs?

Describe:

9. Are all contracting opportunities communicated to the Civil Rights Office?

- ☐ Yes
☐ No

F. TRAINING

10. What nondiscrimination training has M & O employees participated in?

Was this mandatory or voluntary training?

G. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# of external Title VI complaints received	
# of informal (verbal) external Title VI complaints	
# of formal (written) external Title VI complaints	
# of unresolved external complaints sent to Civil Rights Office	
# of maintenance work requests issued this quarter	
# of maintenance work requests issued in primarily low-income areas	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Multimodal Program**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 23**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. TITLE VI / NONDISCRIMINATION ACTIVITIES

1. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this reporting period?

- ☐ Yes
- ☐ No

If yes, briefly describe the matter and indicate whether it was referred to the Civil Rights Office:

2. Describe any Title VI/nondiscrimination monitoring, review, or related activities conducted during this reporting period.
3. Describe any Title VI/nondiscrimination outreach, public involvement, or technical assistance activities conducted during this reporting period.

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

4. Does written public information provided by the program include applicable Title VI/nondiscrimination language?

- ☐ Yes

☐ No

Comments, if applicable:

5. Were language assistance services requested or provided during this reporting period?

☐ Yes

☐ No

If yes, briefly describe the services provided:

C. ACCESSIBILITY

6. Describe any ADA/Section 504 accessibility reviews or related activities conducted during this reporting period.

D. MUNICIPAL/SUBRECIPIENT MONITORING

7. Were any Title VI/nondiscrimination requirements or related technical assistance provided to municipalities or other subrecipients during this reporting period?

☐ Yes

☐ No

If yes, briefly describe:

E. TRAINING

8. What Title VI/nondiscrimination training or technical assistance was provided to or received by program staff, municipalities, or other subrecipients during this reporting period?

Municipal Attendees:

Federal Employees:

State Employees:

Public:

Describe (attach training/meeting agendas):

9. Were any DBE participation or contract civil rights issues identified that required follow-up?

☐ Yes

☐ No

If yes, briefly describe.

F. PROGRAM INFORMATION

Please provide the following information for the reporting period.

# of Certifications	
# of Recertifications	
# of Sub-Recipient Title VI Compliance Assessments sent	
# of Sub-Recipient Title VI Compliance Assessments returned	
# of Title VI complaints, serious compliance issues, etc. involving a local agency	
Name(s) of Local Agencies, if any, with Title VI complaints, serious compliance issues, etc.	
# of LAP Project(s)	
# of Civil Rights Office reviews of LAP Project(s) for compliance	
# of reviewed contracts lacking contract requirements (1273, 26.13(b), Appendix A thru E)	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Planning**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December **(due January 15th)**
- ☐ Quarter 2 – January, February, March **(due April 15th)**
- ☐ Quarter 3 – April, May, June **(due July 15th)**
- ☐ Quarter 4 – July, August, September **(due October 15th)**

A. TITLE VI/NONDISCRIMINATION ACTIVITIES

1. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention this quarter?

- ☐ Yes
- ☐ No

Explain:

2. Describe Title VI/Nondiscrimination related monitoring, reviews, meetings, or other activities conducted during the quarter.

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

3. Does written public information developed or distributed during the quarter include applicable Title VI/nondiscrimination information?

- ☐ Yes
- ☐ No

Comments:

4. Were language assistance services requested or provided during the quarter?

☐ Yes

☐ No

If yes, briefly describe the services provided:

C. PLANNING ACTIVITIES

5. Describe any planning activities, public meetings, studies, plans, outreach, or other program activities during the quarter in which Title VI/nondiscrimination considerations were addressed:

6. Were any accessibility, language assistance, or other nondiscrimination concerns identified during planning activities?

☐ Yes

☐ No

If yes, briefly describe:

D. DOCUMENTATION

7. Is documentation maintained for Title VI/nondiscrimination activities conducted during the quarter, including applicable public involvement, correspondence, complaints, language assistance, and monitoring activities?

☐ Yes

☐ No

If no, briefly explain:

E. TRAINING

39. What nondiscrimination training has Planning employees participated in?

Was this mandatory or voluntary training?

F. PROGRAM INFORMATION

# Webinar public meetings	
# of traditional public meetings	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# of PIPs developed during reporting period	
# language requests received and services provided during traditional meetings/hearings	
# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# MPOs trained	
# RPCs trained	
# State Employees trained	
# Federal Employees trained	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Project Development (Highway and Bridge Programs)**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December **(due January 15th)**
- ☐ Quarter 2 – January, February, March **(due April 15th)**
- ☐ Quarter 3 – April, May, June **(due July 15th)**
- ☐ Quarter 4 – July, August, September **(due October 15th)**

A. TITLE VI/NONDISCRIMINATION ACTIVITIES

40. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this quarter?

- ☐ Yes
- ☐ No

If yes, briefly describe the issue and any action taken:

41. Describe Title VI/nondiscrimination related monitoring, reviews, meetings, or other activities conducted during the quarter.

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

42. Does written public information developed or distributed during the quarter include applicable Title VI/nondiscrimination language?

- ☐ Yes
- ☐ No

Comments:

43. Were language assistance services requested or provided this quarter?

- ☐ Yes
- ☐ No

If yes, briefly describe the service provided:

44. Were accessibility accommodations requested or provided for public meetings, hearings, or other public involvement activities?

- ☐ Yes
- ☐ No

If yes, briefly describe:

C. PROJECT DEVELOPMENT

45. Describe Title VI/nondiscrimination related activities, reviews, public involvement, or concerns identified during project development activities this quarter:

46. Were any actions taken to address Title VI/nondiscrimination concerns related to project development?

- ☐ Yes
- ☐ No

If yes, briefly describe:

D. DOCUMENTATION

47. Is documentation maintained reflecting Title VI/nondiscrimination correspondence, complaints,

public involvement, language assistance, accessibility accommodations, monitoring, training, and other related activities?

☐ Yes

☐ No

If no, briefly describe:

E. CONSULTANT CONTRACTS

48. What actions were taken during the quarter to identify subcontracting or consulting opportunities and solicit interest, bids, or quotes from DBEs, as applicable?

49. Were applicable contracting opportunities communicated to the Civil Rights Office?

☐ Yes

☐ No

F. TRAINING

50. What nondiscrimination training has Project Development employees participated in?

Was this mandatory or voluntary training?

G. PROGRAM INFORMATION

# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# Webinar public meetings	
# of traditional public meetings	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# Language requests received for services provided during traditional meetings/hearings	
# Language services provided during traditional meetings/hearings	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Property Office**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 15th**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. TITLE VI/NONDISCRIMINATION ACTIVITIES

51. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this quarter?

- ☐ Yes
- ☐ No

If yes, briefly describe the issue and any action taken or referred to the Civil Rights Office:

52. Describe Title VI/Non-discrimination related monitoring, reviews, meetings, or other activities conducted during the quarter:

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

53. Does written public information provided to property owners, tenants, occupants, or other affected persons include applicable Title VI/nondiscrimination information?

- ☐ Yes
- ☐ No

54. Were language assistance services requested or provided during the quarter?

- ☐ Yes
- ☐ No

If yes, briefly describe the service provided:

C. PROPERTY AND RIGHT-OF-WAY ACTIVITIES

55. Describe Title VI/nondiscrimination related activities, reviews, concerns, or issues identified during appraisal, acquisition, relocation, property management, or other Property Office activities this quarter:

56. Were any Title VI/nondiscrimination concerns identified during property-owner, tenant, or occupant contacts or negotiations?

☐ Yes

☐ No

If yes, briefly describe the concerns identified:

57. Were any actions taken to address Title VI/nondiscrimination concerns related to Property Office activities?

☐ Yes

☐ No

If yes, briefly describe:

D. ACCESSIBILITY

58. Were any accessibility related concerns identified during Property Office activities, including property-owner contacts, relocation activities, or access to information?

☐ Yes

☐ No

If yes, briefly describe the concerns and any actions taken:

E. DOCUMENTATION

59. Is documentation maintained reflecting Title VI/nondiscrimination correspondence, complaints, public involvement, language assistance, accessibility accommodations, monitoring, training, and other related activities?

☐ Yes

☐ No

If no, briefly explain:

60. Are records maintained sufficient to document Title VI/nondiscrimination activities and actions taken during the reporting period?

☐ Yes

☐ No

Comments:

61. Are records maintained to document Title VI/nondiscrimination activities and actions taken during the reporting period

☐ Yes

☐ No

Comments:

F. CONSULTANT CONTRACTS, DEEDS, PERMITS AND LEASES

62. Were Title VI/nondiscrimination requirements included in applicable consultant or other agreements?

☐ Yes

☐ No

Comments:

63. Were applicable deeds, permits, leases, or other property-related documents reviewed for required nondiscrimination provisions?

☐ Yes

☐ No

Comments:

G. TRAINING

64. What nondiscrimination training has Property Office employees participated in?

Was this mandatory or voluntary training?

H. PROGRAM INFORMATION

# of comment cards returned from impacted parcels	
# of complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Departments Title VI Coordinator	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

Note: Comment cards are given to all impacted owners and totals are tracked annually and are reported to the Civil Rights Office with the October (Quarter 4) report each year.

**Maine Department of Transportation
TITLE VI QUARTERLY REPORT
Traffic Engineering**

Title VI Liaison: _____

Email: _____

Reporting Period:

- ☐ Quarter 1 – October, November, December (**due January 23**)
- ☐ Quarter 2 – January, February, March (**due April 15th**)
- ☐ Quarter 3 – April, May, June (**due July 15th**)
- ☐ Quarter 4 – July, August, September (**due October 15th**)

A. TITLE VI/NONDISCRIMINATION ACTIVITIES

1. Were any Title VI or nondiscrimination issues, concerns, or complaints brought to your attention during this quarter?

- ☐ Yes
- ☐ No

If yes, briefly describe the issue, action taken, and whether the matter was referred to the Civil Rights Office:

2. Describe Title VI/nondiscrimination related monitoring, reviews, meetings, consultations, or other activities conducted during this quarter:

B. PUBLIC INFORMATION AND LANGUAGE ASSISTANCE

3. Does written public information provided by Traffic Engineering include applicable Title VI/nondiscrimination information?

- ☐ Yes
- ☐ No

If yes, briefly describe the type of assistance provided:

C. TRAFFIC ENGINEERING AND ACCESSIBILITY

4. Accessible Pedestrian Signals and Accessibility Features – Describe any traffic engineering activities during the quarter involving accessible pedestrian signals, pedestrian push buttons, audible or vibrotactile features, or other accessibility-related traffic signal features:
5. Accessibility Reviews – Were accessibility related issues or concerns identified during the design, review, installation, alteration, operation, or maintenance of traffic signals, pedestrian crossings, crosswalks, or related facilities:

- ☐ Yes
☐ No

If yes, briefly describe the issue and action taken or referred:

D. PUBLIC REQUESTS OR ACCESSIBILITY CONCERNS

6. Were any requests, inquiries, or concerns regarding pedestrian accessibility or accessible traffic signal features received during the quarter?

- ☐ Yes
☐ No

Describe:

E. MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES (MUTCD)

7. Describe any activities conducted during the quarter to review, update, or implement traffic control devices in accordance with the current Manual on Uniform Traffic Control Devices (MUTCD) and applicable State requirements:
8. Were any significant MUTCD-related issues, questions, or concerns identified during the quarter?

- ☐ Yes
☐ No

If yes, briefly describe the issue and any action taken:

9. Are applicable Traffic Engineering records, standards, plans, or other documentation maintained to support the review and implementation of traffic control devices?

☐ Yes

☐ No

Describe:

F. DOCUMENTATION

10. Is documentation maintained reflecting Title VI/nondiscrimination correspondence, complaints, monitoring, training, language assistance, accessibility-related activities, and other related activities?

☐ Yes

☐ No

If no, explain:

11. Are records maintained sufficient to document Title VI/nondiscrimination related activities and actions taken during the reporting period?

☐ Yes

☐ No

Comments:

G. STAFF TRAINING

12. What Title VI, nondiscrimination, accessibility, or related training did Traffic Engineering staff participate in during this quarter?

Describe:

Was this mandatory or voluntary training?

13. Were staff provided information or training regarding how to respond to requests for language assistance or accessibility accommodation?

☐ Yes

☐ No

Describe:

H. PROGRAM INFORMATION

Number of external Title VI complaints received	
Number of informal (verbal) external complaints	
Number of formal (written) external complaints	
Number of unresolved external complaints sent to the Civil Rights Office	
Number of Contractors trained	
Number of Consultants trained	
Number of Residents trained	
Number State Employees trained	
Number Federal Employees trained	
Number of maintenance work orders issued this quarter	
Number of maintenance work orders issued in primarily low income areas	
Number of translation services provided	
Number of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

APPENDIX V:
SUBRECIPIENT CHECKLIST

Subrecipient Checklist
Desk Audit Review

Subrecipient Reviewed:

Date(s) of Desk Audit Review:

Reviewer:

Information was reviewed from reviewing the Assessment Tool, website information, and any attachments provided.

A. TITLE VI ORGANIZATION AND POLICY

YES NO

- | | | |
|--------------------------|--------------------------|---|
| ☐ | ☐ | Title VI/Nondiscrimination Policy Statement |
| ☐ | ☐ | Title VI/Nondiscrimination Assurances provided to MaineDOT |
| ☐ | ☐ | Name, position, contact information of Title VI/Nondiscrimination Coordinator |
| ☐ | ☐ | Title VI/Nondiscrimination Plan or procedures, as applicable |

B. TITLE VI COMPLAINT PROCEDURES

YES NO

- | | | |
|--------------------------|--------------------------|--|
| ☐ | ☐ | Written procedures for processing external discrimination complaints |
| ☐ | ☐ | Process for notifying or referring complaints to appropriate agency |
| ☐ | ☐ | Complaint records maintained |

C. TITLE VI IN PROGRAMS AND ACTIVITIES

YES NO

- | | | |
|--------------------------|--------------------------|--|
| ☐ | ☐ | Procedures for ensuring nondiscrimination in administration of programs & activities |
| ☐ | ☐ | Procedures to ensure nondiscrimination in public participation & outreach activities. |
| ☐ | ☐ | Procedures for providing language assistance to individuals with access needs |
| ☐ | ☐ | Procedures for collecting and maintaining data necessary to monitor compliance with Title VI |
| ☐ | ☐ | Procedures for reviewing applicable data to identify Title VI compliance concerns |
| ☐ | ☐ | Title VI information and nondiscrimination notice made available to program participants |

D. CONTRACTS AND LOWER-TIER AGREEMENTS

YES NO

- | | | |
|--------------------------|--------------------------|---|
| ☐ | ☐ | Applicable Federal-aid contracts, agreements or other instruments contain required Title VI/nondiscrimination provisions. |
| ☐ | ☐ | Process for including applicable Title VI/nondiscrimination requirements in lower-tier agreements. |

E. RECORDS, DOCUMENTATION AND COMPLIANCE

YES NO

- | | | |
|--------------------------|--------------------------|---|
| ☐ | ☐ | Title VI records and documentation are maintained |
| ☐ | ☐ | Records and information necessary to demonstrate Title VI compliance are available for review by MaineDOT |
| ☐ | ☐ | Title VI training or information has been provided to applicable personnel |
| ☐ | ☐ | Previous Title VI deficiencies or corrective actions have been addressed, if applicable |

F. TECHNICAL ASSISTANCE

YES NO

☐ ☐ Has the subrecipient requested Title VI or other Civil Rights technical assistance

G. REVIEW RESULTS

- ☐ Compliant
- ☐ Compliant with corrective action required
- ☐ Additional information required
- ☐ Noncompliance identified

Corrective Action Required:

Due date for corrective action:

Reviewed by:

Date:

MAINEDOT CIVIL RIGHTS OFFICE

Rev. 09.2026

APPENDIX VI:

SUBRECIPIENT TITLE VI COMPLIANCE ASSESSMENT TOOL

SUB-RECIPIENT TITLE VI COMPLIANCE ASSESSMENT TOOL

Authority and Purpose

23 CFR § 200.9(b)(7) requires State highway agencies to conduct periodic reviews of subrecipients of Federal-aid highway funds to determine compliance with Title VI requirements. MaineDOT conducts reviews of applicable recipients and subrecipients of Federal financial assistance administered through the Department.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d–2000d-7, provides that 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 otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Other applicable Federal nondiscrimination requirements may also apply, including 23 U.S.C. § 324 and 49 CFR Part 21.

MaineDOT has developed this assessment as part of its Title VI review process. The assessment is used to evaluate applicable Title VI and nondiscrimination requirements, document the results of MaineDOT's review, identify deficiencies when applicable, and document corrective actions.

The questions below are intended to address requirements applicable to the sub-recipient's federally assisted programs and activities. Not every question will apply to every sub-recipient.

Please complete this questionnaire and provide requested attachments or other supporting information to:

Maine Department of Transportation

Civil Rights Office
16 State House Station
Augusta, ME 04333-0016

Email: mary.bryant@maine.gov and sherry.tompkins@maine.gov

Questions may be directed to:

Sherry Y. Tompkins

Civil Rights Office Director / Title VI Coordinator
207-624-3066
sherry.tompkins@maine.gov

Mary Bryant

Title VI Specialist / DBE Program Administrator
207-624-3056
mary.bryant@maine.gov

Maine Relay: 711

Baseline Questionnaire

1. Name of your Agency: _____
2. Number of full-time and part-time employees: F/T_____ P/T_____
3. Has your agency provided current written Title VI Assurances to MaineDOT? If not, please attach a copy. _____
4. Does your agency physically include the Civil Right Special Provisions (FHWA-Form 1273) in all contracts and ensure that they are included in all subcontracts, including third-tier contracts? _____
5. Who is the Title VI contact person for your agency? _____. Does this person accept complaints from the public? _____. If no, who does? _____. Please include title, email and telephone number for each person listed. _____

6. In the past three years, has your agency been named in a discrimination complaint or lawsuit? _____. If so, when and what was the nature of the complaint or lawsuit and the outcome. _____
7. Does your agency have a written discrimination complaint process? If so, please attach a copy and provide the web address where this is located on your website. _____. If either no written discrimination complaint process exists, or it is not located on your website, please explain. _____

8. Has your agency made the public aware of the right to file a complaint? _____. If so, by what mechanism _____. Please attach a copy. If no, explain _____
9. Does your agency have procedures to provide language assistance to individuals with language access needs in connection with its federally assisted programs and activities? _____. Please explain _____
10. In the past twelve (12) months, what has your agency done to receive and consider input from all citizen groups? Please describe, if applicable. _____

11. Does your agency have a method to collect racial and ethnic data on citizens impacted by your projects? _____. If so, please describe. _____

12. Does your agency include the required Disadvantaged Business Enterprise (DBE) assurance language at 49 CFR 26.13(a) and (b) verbatim in all financial agreements, contracts and

subcontracts? (Please see DBE Assurance language below.) _____

§26.13 What assurances must recipients and contractors make?

(a) Each financial assistance agreement you sign with DOT operating administration (or a primary recipient) must include the following assurance:

The recipient shall not discriminate on the basis of race, color, national origin or sex in the award and performance of any DOT-assisted contract or in the administration of its DBE program or the requirements of 49 CFR part 26. The recipient shall take all necessary and reasonable steps under 49 CFR part 26 to ensure nondiscrimination in the award and administration of DOT assisted contracts. The recipient's DBE program, as required, by 49 CFR part 26 and as approved by DOT, is incorporated by reference in this agreement. Implementation of this program is a legal obligation and failure to carry out its terms shall be treated as a violation of this agreement. Upon notification to the recipient of its failure to carry out its approved program, the Department may impose sanctions as provided for under Part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S. C. 3801 et seq.).

(b) Each contract you sign with a contractor (and each sub-contract the prime contractor signs with a sub-contract) must include the following assurance:

The contractor, sub recipient or sub-contractor shall not discriminate on the basis of race, color, national origin or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT assisted contracts. Failure by the contractor to carry out these requirements is a breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

13. Does your agency monitor DBEs on construction projects to ensure they are performing a commercially useful function (CUF)? _____. If so, where is this documented? _____ If not, please explain. _____ If a DBE is not performing a CUF, what actions have you taken? Who do you notify? _____

14. Do you have any questions regarding this assessment or Title VI? _____ Please include them here along with your email address and/or phone number. _____

15. Would your agency like Title VI training or other Civil Rights technical assistance, if yes, please explain. _____ Does your agency have teleconferencing ability? _____

16. Please provide the name, title and contact information of the person who completed this baseline assessment. _____

17. Provide an annual report on Title VI accomplishments for the previous year and goals for the next year. _____

18. Are you sending your Title VI implementation Plans and Goals and Accomplishment Reports to MaineDOT? Please attach the most recent one. Are you completing these on an annual basis as required? _____

Rev. 09.2026

APPENDIX VII:
RIGHT-OF-WAY ANONYMOUS DEMOGRAPHIC SURVEY

Anonymous Demographic Survey

To All Impacted: The Maine Department of Transportation collects the following information in compliance with Title VI of the Civil Rights Act of 1964, related statutes, and Executive Orders regarding “Nondiscrimination in Federally Assisted Programs”. We ask that you take a few moments to complete the following survey. Your demographic data will enable MaineDOT to identify impacted residents and communities affected by the Federal-aid Highway Program.

☐ Male ☐ Female ☐ _____

YES

NO

Is your household income less than \$19,900 per year?

☐☐

Are you disabled?

☐☐

Are you over the age of 62?

☐☐

Do you have difficulty speaking English?

☐☐

Racial/Ethnic Data: Please identify yourself with one of the following racial/ethnic groups:

☐ White (not of Hispanic origin)

☐

Native American

☐ Black (not Hispanic origin)

☐

Hispanic

☐ Asian or Pacific Islander

☐

Other

Please return the completed survey in the provided postage-paid envelope.

APPENDIX VIII:
DISCRIMINATION COMPLAINT FORM

Maine Department of Transportation
External Discrimination Complaint Form

Use this form to file a discrimination complaint concerning a MaineDOT federally assisted program or activity. Complaints may allege discrimination based on race, color, national origin, sex, religion/creed, age, or disability, or retaliation for opposing discrimination or participating in a protected civil rights activity.

SECTION I — COMPLAINANT INFORMATION

Name: _____

Email Address: _____

Phone Number: _____

Mailing Address: _____

City, State, ZIP Code: _____

SECTION II — REPRESENTATIVE INFORMATION

Are you filing this complaint on your own behalf?

If you are filing on behalf of another person, provide the following information:

Name of Person You Represent: _____

Your Relationship to That Person: _____

Reason You Are Filing on Their Behalf:

Do you have permission from the person who experienced the alleged discrimination to file this complaint on their behalf?

Representative Email Address: _____

Representative Phone Number: _____

Representative Mailing Address: _____

City, State, ZIP Code: _____

SECTION III — COMPLAINT INFORMATION

Date(s) of Alleged Discrimination or Retaliation: _____

Is the alleged discrimination or retaliation ongoing?

Name of Person(s), Office, or Organization Alleged to Have Discriminated or Retaliated:

Protected Class

I believe I was discriminated against based on one or more of the following protected classes:

(Race, Color, National Origin, Sex, Religion/Creed, Age, Disability)

Protected class(es) involved: _____

Retaliation

If the complaint alleges retaliation, please describe the protected civil rights activity or opposition to discrimination that you believe resulted in retaliation.

Description of Complaint

Please describe what happened, including the date(s), location, person(s) involved, what was said or done, and why you believe the action or treatment was discriminatory based on the protected basis identified above. If the complaint involves retaliation, please describe the action you believe was retaliatory. Attach additional pages or supporting documentation if needed. _____

Please explain why you believe the alleged discrimination or retaliation occurred. _____

Additional Person Who May Have Information About Your Complaint

Name: _____

Phone: _____

Email or Mailing Address: _____

SECTION IV — CERTIFICATION

I certify that the information provided in this complaint is true and accurate to the best of my knowledge. I understand that MaineDOT may need to disclose information provided in this complaint as necessary to review and process the complaint.

Signature: _____

Date: _____

Printed/Typed Name: _____

SUBMISSION OF COMPLAINT

Submit the completed complaint form and any supporting documentation to:

Maine Department of Transportation
Civil Rights Office
16 State House Station
Augusta, Maine 04333-0016

Attention: Sherry Y. Tompkins

Email: sherry.tompkins@maine.gov

Fax: 207-624-3021

Telephone: 207-624-3066

Maine Relay: 711

Revision Date: 09/24/2026