

Title VI Foundation

Civil Rights Act of 1964

- Prohibits discrimination in federally funded programs
- Applies to race, color, and national origin





Your Key Requirements

1. Annual Submissions
2. Annual Implementation Plan
3. Documentation
4. Public Notification

Annual Title VI Implementation Plan

Annual submission is a condition of receiving federal-aid funds administered by MaineDOT

Requirement

Submission of annual Title VI assurances is required under Title VI of the Civil Rights Act of 1964

Why It Matters

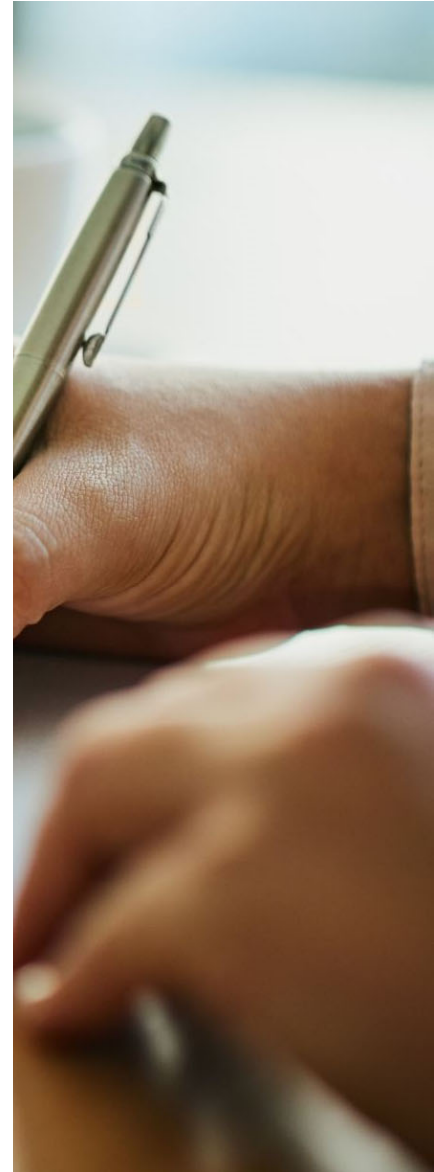
Maintains eligibility for federal funding
Ensures non-discrimination compliance
Demonstrates accountability & transparency

Who Must Comply

Local Public Agencies (LPAs) receiving federal-aid funds through MaineDOT

What to Submit Annually

Updated Title VI Assurances
Current Title VI compliance documentation (August – Sept)



Documentation

LPAAs must maintain documentation of Title VI compliance, which may be reviewed by MaineDOT

LPA Title VI Implementation Plan

Key records include signed annual assurances, Limited English Proficiency procedures, complaint procedures, demographic data, staff training, and internal compliance review procedures.



Limited English Proficiency

- LEP Covers persons who do not speak English as their primary language; and
- Have a limited ability to read, speak, write, or understand English





Public Notification

LPAs must inform the public that they do not discriminate and provide instructions for filing complaints

- LPAs must have a written Title VI Complaint Process, which must be publicly available on your website
- All complaints must be logged into an ongoing log maintained by LPAs



Equal Employment Opportunity Form FHWA- 1273

The provisions of Form FHWA-1273 apply to all Federal-aid construction projects

These provisions must be incorporated into every construction contract, subcontracts, and lower-tier subcontracts

No modifications to the provisions of Form FHWA-1273 are permitted

All Forms FHWA-1273 need to be readily available to MaineDOT and FHWA upon request

Current form is located on the FHWA website:
<https://www.fhwa.dot.gov/construction/cqit/form1273.cfm>

LPA Title VI Requirements

Incorporate Title VI in project administration (compliance in schedules, reporting, and oversight).

Monitor contractors and staff (ensure all parties are following non-discrimination requirements).

Training and communication (Ensure team members understand Title VI requirements and know how to report concerns).

Documentation and reporting (keep clear records of efforts to prevent discrimination, complaints received, and resolutions).

Contractor and Subcontractor Title VI Requirements



Include Title VI non-discrimination clauses in contracts and subcontracts, or agreements



Collect and maintain data to track information on workforce composition and subcontractor participation to demonstrate nondiscrimination.



Respond to complaints by having a process to receive and address complaints of discrimination from employees or the public.



Training to ensure employees understand nondiscrimination obligations under Title VI

What Title VI Prohibits

- ✓ Denying anyone the benefit of programs, services or activities; and
- ✓ Providing different services, aid, or benefits, or providing these differently from how they are provided to others; and
- ✓ Segregating or separately treating individuals in any manner related to the service or receipt of any service or activity.

If discrimination is found, you risk jeopardizing your federal funding.



Key Takeaways

Title VI compliance revolves around nondiscrimination, monitoring, documentation, and training. The emphasis is on integrating nondiscrimination into every step of projects.



