

MaineDOT

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Maine Department of Transportation

FHWA TITLE VI PROGRAM FFY 2024 IMPLEMENTATION PLAN

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

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INTRODUCTION

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

MaineDOT is a recipient of federal funds from the U.S. Department of Transportation modal agencies, including the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). All recipients of federal funding must comply with the requirements of Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, regulations, and authorities. This Implementation Plan describes how MaineDOT accomplishes nondiscrimination in the delivery of its federally assisted programs, services, and activities. The Plan includes the structure of MaineDOT's Title VI program as well as the policies, procedures, and practices MaineDOT uses to comply with nondiscrimination requirements.

The Plan is intended to be a living document, regularly monitored and updated by MaineDOT to reflect the program as it changes and grows. Anyone who wishes to provide input into MaineDOT's Title VI Program Implementation Plan is encouraged to contact the Director of the Civil Rights Office, Sherry Y. Tompkins, at (207) 624-3066 or sherry.tompkins@maine.gov, or by writing to the Civil Rights Office at MaineDOT Headquarters, 16 State House Station, Augusta, ME 04333- 0016.

NOTICE

If the information contained in this Title VI Nondiscrimination Plan is needed in another language, please contact the Maine Department of Transportation Title VI Specialist at 207-524-3056 or 207-624-3020.

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.

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.

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

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

لعدم التمييز مطلوبة بلغة أخرى، 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.207-624-3020 الباب السادس

TITLE VI AUTHORITIES

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

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

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

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

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

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

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

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

- (b) For the purposes of this section, the term ‘make and enforce contracts’ includes the making performance, modification, and termination of contracts and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.
- (c) The rights protected by this section are protected against impairment by non-governmental discrimination and impairment under color of State law.”

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

NONDISCRIMINATION EXECUTIVE ORDERS

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

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

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

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

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

NONDISCRIMINATION REGULATIONS & GUIDANCE

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

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

TITLE VI STANDARD ASSURANCES

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

I. APPLICATION

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

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

Or by writing to:

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

Or by calling: (207) 624-3066

Executive Approval of Title VI Plan

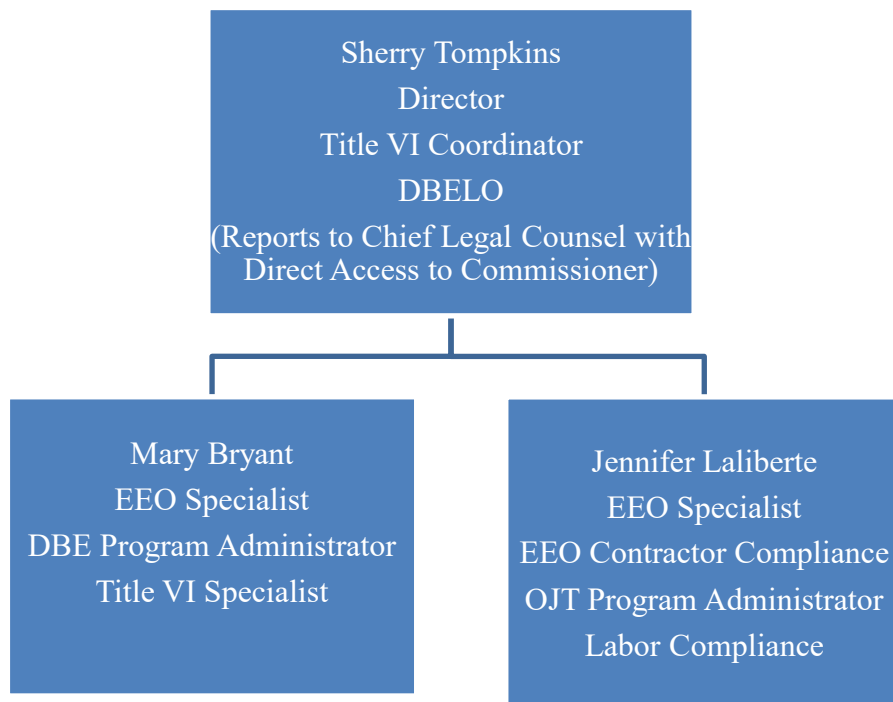
This Title VI plan has been reviewed and approved by the MaineDOT Commissioner. The Civil Rights Office provided the Commissioner with a draft plan and consults with the Commissioner on aspects and requirements of the Title VI Plan. Once the Plan is approved by the Commissioner, it is posted to the FTA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

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

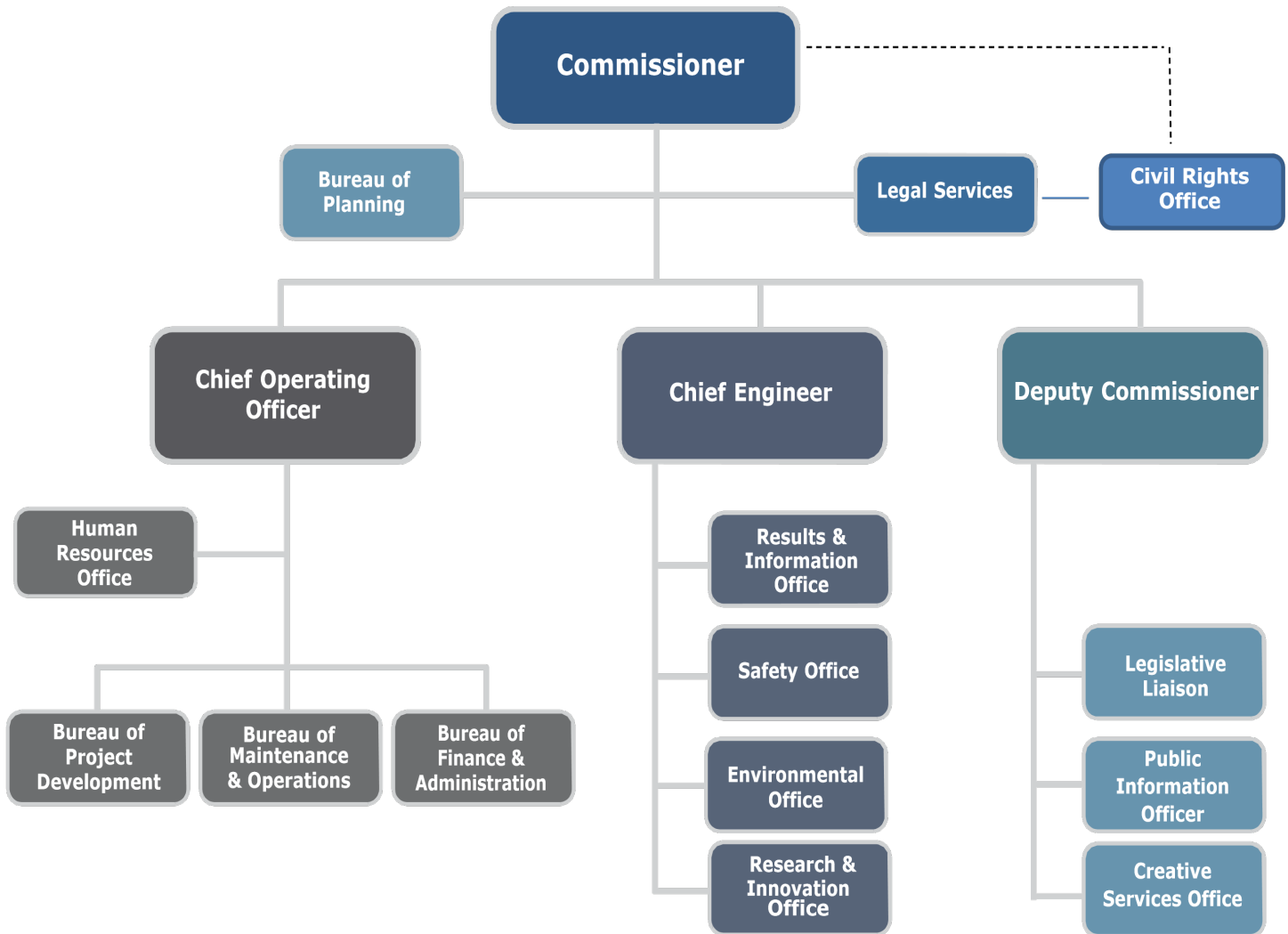
II. ORGANIZATION AND STAFFING OF CIVIL RIGHTS OFFICE

The Commissioner of MaineDOT is responsible for ensuring the implementation of MaineDOT's Title VI program. The Civil Rights Director, on behalf of the Commissioner, is responsible for the overall management of the Title VI program. The day-to-day administration of the program is undertaken by the Civil Rights Office, under the supervision of the Chief Legal Counsel. The Civil Rights Office has, direct access to the Commissioner. The Civil Rights Director has lead responsibility for coordinating the administration and implementation of Title VI and related statutes program, plan, and assurances. The Civil Rights Director delegates some Title VI duties to the EEO Officers and to Title VI Liaisons in program areas. The Liaisons work with the Civil Rights Office to administer the Program in their respective areas.

CIVIL RIGHTS TITLE VI OFFICE STAFF



Maine DOT Organizational Chart



September 2022



CIVIL RIGHTS TITLE VI OFFICE STAFF CONTACT INFORMATION

Commissioner	Bruce A. Van Note, Esq.	(207) 624-3003	Bruce.dot@maine.gov
Chief Legal Counsel	Anne Pare, Esq.	(207) 624-3020	Anne.m.pare@maine.gov
Director, Civil Rights Office	Sherry Y. Tompkins Title VI Coordinator	(207) 624-3066	sherry.tompkins@maine.gov
Equal Employment Opportunity Specialist	Mary Bryant DBE Program Administration, Title VI Specialist	(207) 624-3056	mary.bryant@maine.gov
Equal Employment Opportunity Specialist	Jennifer Laliberte EEO Contractor Compliance, OJT Administration, Labor Compliance	(207) 624-3036	jennifer.e.laliberte@maine.gov

Duties of the Civil Rights Office

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

III. PROGRAM REVIEW PROCEDURES

Title VI Liaisons in Programs

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

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

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

Title VI Responsibilities

Bureau of Planning

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

The Bureau's Title VI Liaison will:

- Serve as a resource person for the Bureau of Planning. Help to develop and document procedures that ensure participation of a cross-section of people representative of the population(s) affected by Department projects, including identifying and proactively reaching out to various and diverse social, economic, and ethnic interest groups, and ensure the groups are represented in the planning process.
- Provide information to Planning staff, MPOs, and RPCs regarding Title VI.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.

- Ensure equal opportunity for participation on RPCs.
- Ensure Title VI language is included in every Bureau of Planning subrecipient contract.
- Address any complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with an quarterly reports of Title VI accomplishments and/or any issues and expected changes.

Bureau of Project Development

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

The Bureau's Title VI Liaison will:

- Monitor all Project Development activities to ensure nondiscrimination within program areas.
- Perform reviews of Title VI subrecipients to ensure Title VI adherence.
- Ensure Title VI language is included in every Bureau of Project Development program area subrecipient contract and subcontract.
- Serve as a resource person for the Bureau of Project Development. Help to develop and document procedures that ensure participation of a cross-section of people representative of the population(s) affected by Department projects, including identifying and proactively reaching out to various and diverse social, economic, and ethnic interest groups, and ensure the groups are represented in the planning process.
- Provide information to program area staff regarding Title VI.
- Address any complaints received with the Title VI Coordinator.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Title VI Coordinator with quarterly reports on Title VI

accomplishments and/or issues and methods used for the quarter and any changes for the next.

Property Office

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

The Office's Title VI Liaison will:

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

Multimodal Program

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

The Program's Title VI Liaison will:

- Ensure that LPAs provide the Department with signed Title VI Assurances (Form 1050.2a), including all Appendices, annually.
- Ensure that LPAs include in their subcontracts the appropriate Title VI documentation, i.e., Title VI Assurances, including all

Appendices and Form 1273.

- Ensure that all MaineDOT public meetings and notices for LPA projects comply with Title VI.
- Address any complaints received with Title VI Coordinator.
- Assist the Civil Rights Office with Title VI compliance reviews of those subrecipients chosen by the Civil Rights Office and the Liaison annually.
- Provide the Civil Rights Office with a quarterly report regarding projects indicating the relative benefits, services and any adverse impacts and its alternatives on persons and businesses of majority and minority, racial, national origin, and/or low-income groups, including but not limited to LEP persons.
- Provide the Civil Rights Office with quarterly reports of Title VI accomplishments and/or any issues for the quarter and any changes for the next.

Bureau of Maintenance and Operations

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

The Bureau's Title VI Liaison will:

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

Environmental Office

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

The Office's Title VI Liaison will:

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

Safety Office

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

The Office's Title VI Liaison will:

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

Traffic Engineering

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

The Office's Title VI Liaison will:

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

ADA Office

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

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

MaineDOT updates the ADA curb ramp inventory annually and that can be reviewed at: <https://www.maine.gov/mdot/civilrights/ada/>

The Office's Title VI Liaison will:

- Serve as a resource person for the ADA Office.
- Provide statistical data on race, color, and national origin of populations in all areas impacted by the Department's programs or services, including LEP.
- Monitor all activities to ensure nondiscrimination.

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

Civil Rights Office

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

The Civil Rights Office staff will:

- Ensure Title VI language is included in every Civil Rights Office subrecipient contract and subcontract.
- Perform reviews of selected MPOs and RPCs and subrecipients to ensure Title VI adherence (see Subrecipient Review Process).
- Perform Title VI reviews with Liaisons in MaineDOT's program areas.
- Provide or secure training and technical assistance to the Title VI Liaisons and subrecipients.
- Compile and forward Title VI Implementation Plan, Accomplishment and Goal Report to FHWA annually.
- Maintain the Title VI Plan and ensure Title VI, Equal Employment Opportunity (EEO), and Affirmative Action are implemented in MaineDOT's external programs.
- Collect and analyze demographic data for the purposes of monitoring those areas where Title VI (including Limited English Proficiency) and/or Environmental Justice populations may be adversely affected by MaineDOT's projects and activities.

Quarterly Reports sent to the Bureau of Planning, Bureau of Project Development, Property Office, Multimodal Program, Contracts Office, Bureau of Maintenance and Operations, Environmental Office and Safety Office are attached collectively as ***APPENDIX IV***.

IV. SUBRECIPIENT REVIEW PROCEDURES

MaineDOT will update its list of subrecipients annually. These will include MPOs, municipalities, RPCs, and LPAs (other than municipalities) that receive federal funding. MaineDOT has developed a review process for these subrecipients. MaineDOT's checklist for conducting Title VI reviews and a sample of questions MaineDOT asks during Subrecipient reviews are attached as ***APPENDIX V***.

Metropolitan Planning Organizations

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

Local Public Agencies

Each year, MaineDOT identifies three to five LPAs for which an onsite review will be conducted based on the assessment of risk of non-compliance and potential magnitude of the risk of non-compliance. MaineDOT identifies those LPAs based on one or more of the following criteria:

- MaineDOT knows of or has received (formal or informal) complaints about the LPA.
- MaineDOT staff have identified LPAs with known Title VI issues or concerns.
- The LPA has submitted problematic responses to the Title VI compliance questionnaire and/or submitted incomplete Title VI documentation following the questionnaire.
- The LPA receives a large amount of funding from MaineDOT relative to other LPAs.
- The LPA is new to MaineDOT, receives a large amount of funding from MaineDOT and requires Title VI training.

Notification

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

Itemized Listing and Response to the Civil Rights Office

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

Desk Audit

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

On-site Review

The findings made during the desk audit generally determine whether an on-site review is necessary. If an on-site review is necessary, the subrecipient will be notified, and the on-site review will be conducted virtually or in person. When necessary physical on-site reviews will be conducted in accordance with federal, state, and local guidelines.

Deficiencies

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

Follow-up Monitoring

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

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

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

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

V. DATA COLLECTION-REPORTING-ANALYSIS

MaineDOT has gathered a demographic profile of the State of Maine that includes identification of the locations of minority populations in the aggregate, and developed demographic maps that overlay the percent minority, non-minority and non-native-born populations as identified by the U.S. Census or American Community Survey data. We have compiled that data by county, below. MaineDOT's most recent data assessment was done in 2021. MaineDOT will update this information as it becomes available.

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

Based on the 2021 United States Bureau of the Census, American Community Survey 5-Year Estimates (most recent information available), Maine has a small but growing minority population that is geographically spread across the state. In fact, 14 of Maine's 16 counties have minority populations of greater than 5%, and the remaining two counties have seen increases in their minority populations, according to the most recent available data. The summary table below shows white and minority populations for each of the counties. White is defined as one race, White alone, not Hispanic or Latino. Minority is defined as Hispanic or Latino or Latino, Black or African American, Asian, Native Hawaiian or Pacific Islander, American Islander, American Indian or Alaska Native, Other race or Multi-racial. Maine as a whole has an estimated minority of 7.99%.

Approximately 66% of Maine's minority population lives in four counties:

- Androscoggin County: 11, 571 people of whom approximately 62% live in urban Auburn and Lewiston.
- Cumberland County: 34,026 people, of whom approximately 66% live in the Portland metropolitan area (Portland and Scarborough).
- Penobscot County: 11,142 people of whom approximately 78%, live in the Bangor metropolitan area (Bangor, Brewer, Old Town, Orono, Veazie and Hampden).
- York County: 15,858 people, of whom approximately 36% live in Biddeford, Saco and Old Orchard Beach.

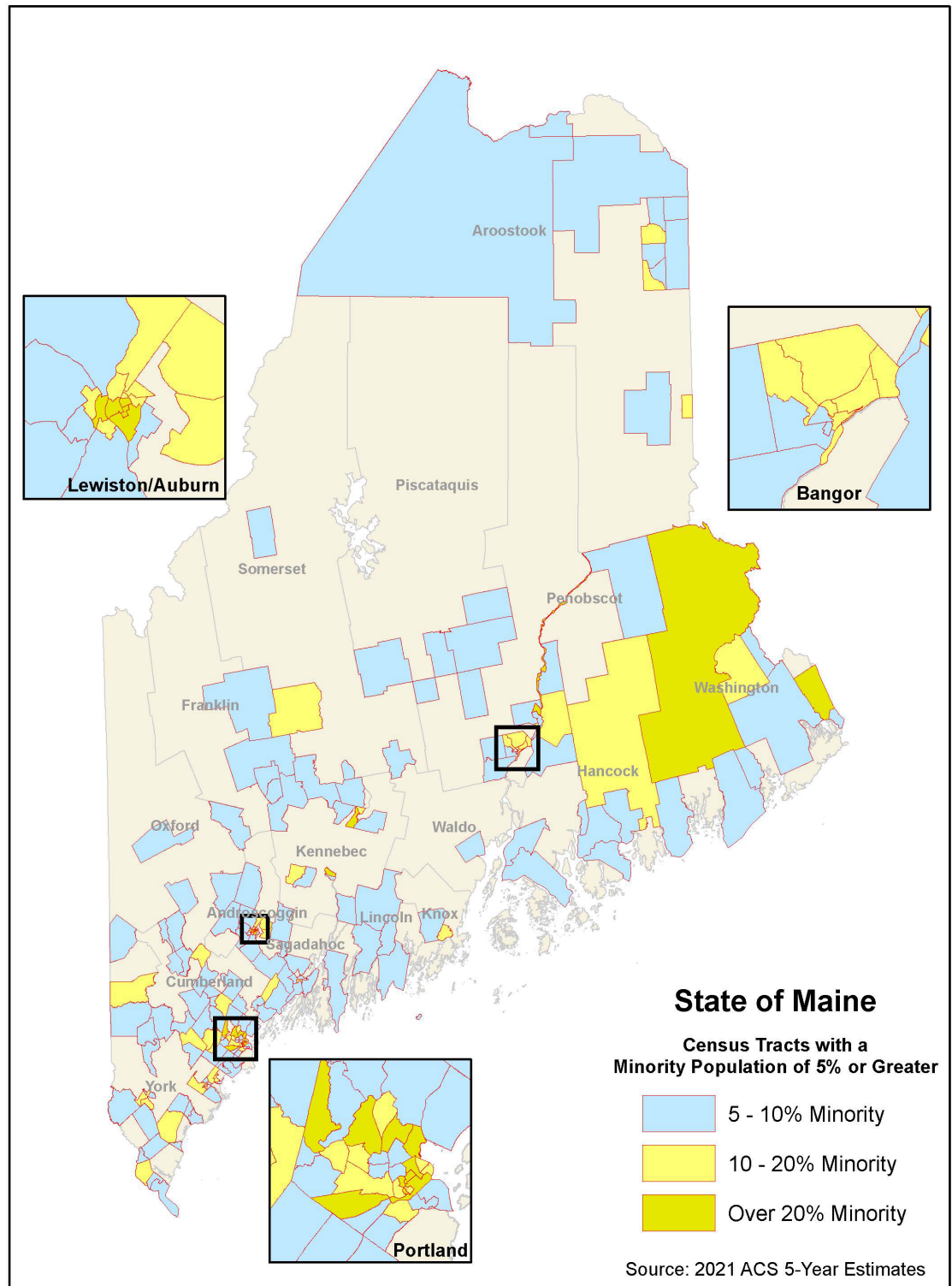
Cumberland and Washington Counties have the greatest percentages of minority populations with 11.31% and 11.26% respectively, while Androscoggin County follows with 10.48%. The Washington County minority population is comprised of the Native American Passamaquoddy Tribe, with some Penobscot and Maliseet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

The following identifies minority populations by county:

State of Maine Race Demographics by State/County				
Count y	Total Population 2021	White #	Minority #	Minorit y %
Maine	1,357,046	1,248,581	108,465	7.99%
Androscoggin	110,378	98,807	11,571	10.48%
Aroostook	67,272	62,809	4,463	6.36%
Cumberland	300,776	266,750	34,026	11.31%
Franklin	29,487	28,021	1,466	4.97%
Hancock	55,417	52,117	3,300	5.95%
Kennebec	123,293	115,799	7,494	6.08%
Knox	40,519	38,390	2,129	5.25%
Lincoln	35,065	33,053	2,012	5.74%
Oxford	57,807	54,379	3,428	5.93%
Penobscot	152,211	141,069	11,169	7.32%
Piscataquis	16,760	15,645	1,115	6.65%
Sagadahoc	36,530	34,210	2,320	6.35%
Somerset	50,424	48,011	2,413	4.79%
Waldo	39,618	37,382	2,236	5.64%
Washington	31,003	27,511	3,492	11.26%
York	210,486	194,628	15,858	7.53%

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

The map on the following page identifies minority populations by county:



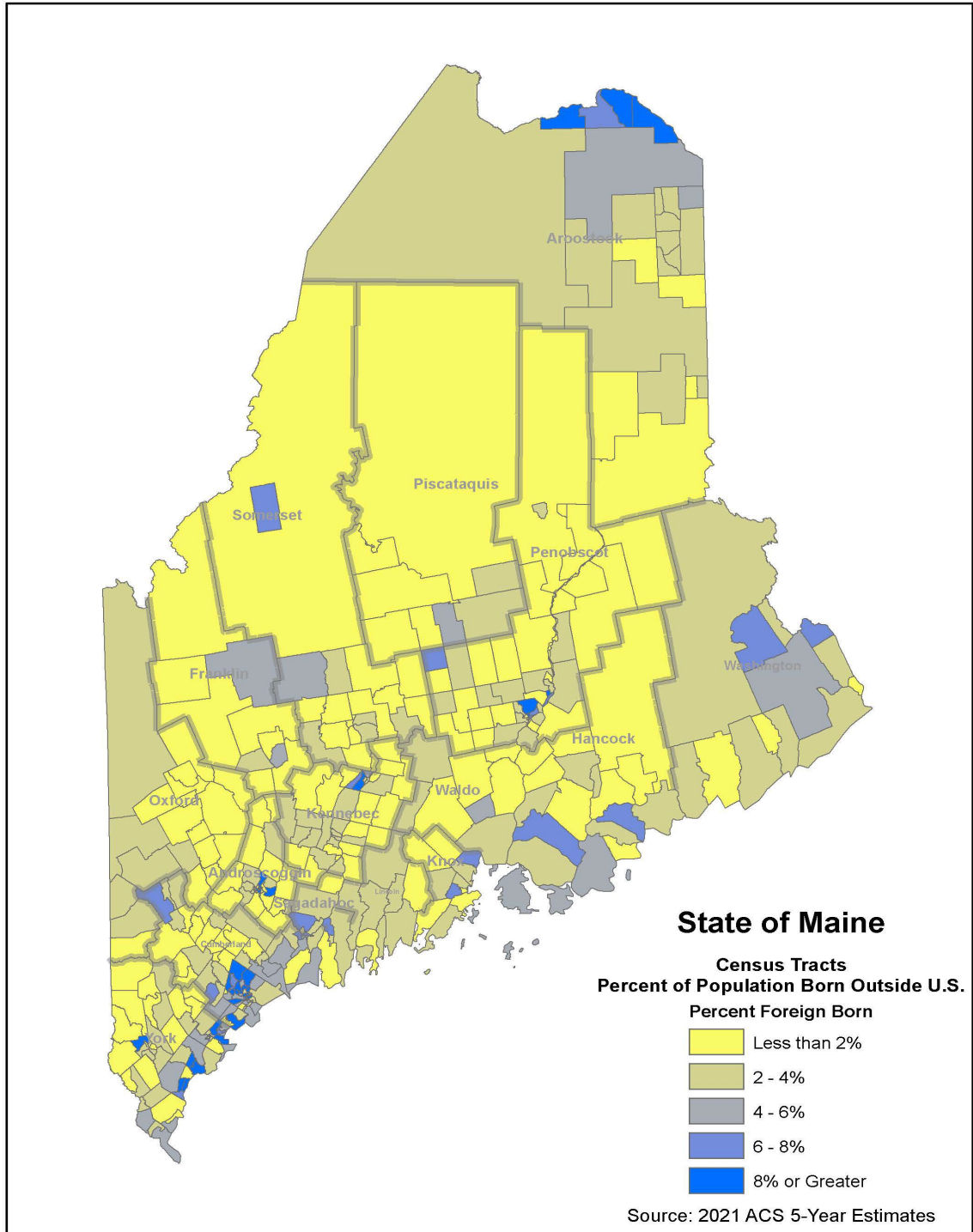
Non-American National Origin

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

County	Total Population 2021	Native Born #	Native Born %	Foreign Born %
Maine	1,357,046	1,307,743	96.4%	3.6%
Androscoggin	110,378	106,373	96.4%	3.6%
Aroostook	67,272	64,503	95.9%	4.1%
Cumberland	300,776	282,508	93.9%	6.1%
Franklin	29,487	28,925	98.1%	1.9%
Hancock	55,417	53,865	97.2%	2.8%
Kennebec	123,293	120,552	97.8%	2.2%
Knox	40,519	39,338	97.1%	2.9%
Lincoln	35,065	34,300	97.8%	2.2%
Oxford	57,807	56,966	98.5%	1.5%
Penobscot	152,211	147,648	97.0%	3.0%
Piscataquis	16,760	16,330	97.4%	2.6%
Sagadahoc	36,530	35,334	96.7%	3.3%
Somerset	50,524	49,611	98.4%	1.6%
Waldo	39,618	38,766	97.8%	2.2%
Washington	31,003	29,951	96.6%	3.4%
York	210,486	202,773	96.3%	3.7%

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

The map on the following page identifies Non-American National Origin populations by county.



VI. TITLE VI TRAINING

Internal

MaineDOT requires periodic Title VI Program training to include the following office and bureaus: Project Development (including Multimodal Program, Property Office, Highway and Bridge), Planning, Safety Office, Environment and Maintenance and Operations. In addition, upon the promotion or reassignment of any of these positions, the Title VI Coordinator will request to meet with that individual to conduct training to familiarize the employee with the Title VI obligations related to his/her program area as well as the best practices for carrying out those requirements. The Title VI Coordinator will schedule Title VI related training to address regulatory changes, as appropriate.

Staff who desire additional training may request it directly from the Title VI Coordinator. The Title VI Coordinator will meet with and update MaineDOT management at least once annually on any issue identified through annual reviews or updates in federal requirements or program changes.

The Title VI Coordinator will meet annually with the Title VI Liaisons as a group to discuss any program issues or concerns that they wish to bring forward or any issues identified in annual reviews or program changes.

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

External

MaineDOT will provide opportunities for training to any Subrecipient. Any time MaineDOT, FHWA or any agency of the USDOT offers training sessions, MaineDOT will extend the training opportunity to our Subrecipients. These include FHWA webinars and local training opportunities that may be provided as requested by MaineDOT.

MaineDOT also provides an open invitation to Subrecipients for Title VI training or to speak about changes and requirements, and the Civil Rights Office will make itself available to attend association meetings and other meeting to provide information, either formal or informal, on Title VI requirements.

The Civil Rights Office provides training on Title VI requirements, Disadvantaged Business Enterprise (DBE) recruiting and reporting, and Davis Bacon labor compliance reporting, twice annually to LPAs and their consultants. Approximately 50 to 60 LPA officials and consultants attend each session, and for an LPA to become and remain certified by MaineDOT, the LPA must attend the training every three years. In addition, the Civil Rights Office provides annual training to MaineDOT construction residents, program managers, project development staff

and contractors regarding documentation requirements related to Title VI, On-the-Job Training, DBE, and Davis Bacon compliance. The documentation training is mandatory and is usually attended by approximately 200 staff.

VII. COMPLAINT PROCEDURES

Who can file? Any person who believes they or a specific class of persons were subjected to discrimination on the basis of race, color or national origin in the programs and activities of a federal-aid recipient may file a Title VI complaint.

Where can one file? Complaints may be filed with MaineDOT, FHWA Division Offices, the FHWA Office of Civil Rights, the United States Department of Transportation (USDOT) Departmental Office of Civil Rights, or the United States Department of Justice.

When must one file? According to U.S. DOT regulations (49 CFR §21.11(b)), a complaint must be filed not later than 180 days after the alleged discrimination.

What should a complaint look like? Complaints should be in writing and signed and may be filed by mail, fax, in person, or email. In the alternative, the complainant may call the Civil Rights Office to report the allegations by telephone, and the Civil Rights Office will transcribe the allegations of the complaint as provided over the telephone. The Civil Rights Office will then send the written complaint as provided by telephone to the complainant for correction and signature. A written complaint should contain at least the following information:

- A written description of what happened; and
- A way to contact the complainant which must include telephone number, e-mail address and physical address; and
- The basis of the complaint (i.e., race, color, national origin); and
- The identification of a specific person(s) and the respondent (i.e., agency/organization/contractor) alleged to have discriminated; and
- Sufficient information to understand the facts that led the complainant(s) to believe that discrimination occurred in a program or activity that received Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s). Complainant should indicate if the alleged discrimination is on-going.

How are complaints routed? FHWA is responsible for all decisions regarding whether a complaint should be accepted, dismissed, or referred to another agency.

With this understanding, complaints should be routed in the following manner:

- All complaints will be routed to the FHWA Headquarters Office of Civil Rights (HCR). HCR is responsible for all decisions whether to accept, dismiss or transfer Title VI complaints filed against State DOTs or subrecipients of federal financial assistance.
- Complaints should be forwarded from the initial receiving agency through the federal-aid highway oversight hierarchy until the complaint reaches HCR. For example, if a complaint is received by a subrecipient City, the City should forward the complaint to the State DOT, which will forward the complaint to the State's FHWA Division Office, which will then forward the complaint to HCR.
- State DOTs and subrecipients must log all complaints received.
- HCR decides on whether to accept, dismiss or transfer the complaint. HCR will notify the complainant, the FHWA Division Office, State DOT and subrecipient (where applicable).

Complaints may be sent to:

Civil Rights Office
Maine Department of Transportation
16 State House Station
Augusta, ME 04333-0016
Attention: Sherry Y. Tompkins
Tel. 207-624-3066
Fax: 207-624-3021
E-mail: sherry.tompkins@maine.gov

and/or

Federal Highway Administration
Region 1 Office
Edmund S. Muskie Federal Building
ATTN: Rachel LeVee, PE, PMP,
Deputy Division Administrator
40 Western Ave., Room 614
Augusta, ME 04330
Tel. 207-512-4912
Fax: 207-626-9133
Email: Rachel.leeve@dot.gov

Federal Highway Administration Headquarters –
Office of Civil Rights
1200 New Jersey Ave., SE HCR-40, Room 81-101
Washington, DC 20590
Tel. 202-366-0693

Additionally, complaints may be filed at the U.S. Department of Justice at:

Federal Coordination and Compliance Section – NWB
Civil Rights Division
950 Pennsylvania Ave. NW
Washington, DC 20530

What are the potential outcomes for processing a complaint? There are four potential outcomes for processing complaints:

1. Accept: If a complaint is timely (see Section VII, 3rd paragraph, above), contains sufficient information to support a claim under Title VI, and concerns matters under FHWA's jurisdiction, the HCR will send to the complainant, the respondent agency, and the FHWA Division Office a written notice that it has accepted the complaint for investigation.
2. Preliminary review: If it is unclear whether the complaint allegations are sufficient to support a claim under Title VI, then HCR may: 1) dismiss the claim; or 2) engage in a preliminary review to acquire additional information from the complainant and/or respondent before deciding whether to accept, dismiss, or refer the complaint.
3. Procedural dismissal: If a complaint is not filed timely, is not in writing and signed, or features other procedural/practical defects, then HCR will send the complainant, respondent, and Division Office a written notice that it is dismissing the complaint.
4. Referral/Dismissal: If the complaint is procedurally sufficient but FHWA 1) lacks jurisdiction over the subject matter; or 2) lacks jurisdiction over the respondent entity, then HCR will either dismiss the complaint or refer it to another agency that does have jurisdiction. If HCR dismisses the complaint, it will send the complainant, respondent, and FHWA Division Office a copy of the dismissal notice. For referrals, FHWA will send a written referral notice with a copy of the complaint to the proper Federal agency and a copy to the USDOT Departmental Office of Civil Rights.

All Letters of Finding issued by FHWA are final.

What are the timeframes for investigations? For FHWA, there is no regulatory timeframe for completing investigations; however, FHWA strives to complete all tasks within 180 days from the date of acceptance. For complaints that have been delegated to MaineDOT by FHWA, 23 CFR §200.9(b)(3) provides that State DOTs

must complete investigations within 60 days of receipt of the delegated complaint from FHWA.

Investigation files are confidential and will be maintained by MaineDOT. The contents of such files will only be disclosed to appropriate MaineDOT personnel and federal authorities in accordance with federal and state laws. MaineDOT will retain files in accordance with records retention schedules and all federal guidelines.

See *APPENDIX VI* for MaineDOT's Title VI complaint form. It may also be found at: <https://www.maine.gov/mdot/civilrights/title-vi/>.

VIII. DISSEMINATION OF TITLE VI INFORMATION

Public Participation

Planning (23 CFR 450.210(a) & 23 CFR 450.316(1)), Environment (National Environmental Policy Act of 1969), Property (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended) and Design (23 USC 109(h)) require effective public involvement/public participation processes, which are combined into MaineDOT's *Public Involvement in Transportation Decision Making*, found at <https://www.maine.gov/mdot/env/NEPA/public/index.shtml>. Highlights from the plans are as follows:

Public Involvement and Traditionally Underserved Populations

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

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

To maximize the effectiveness of the Department's public participation efforts in engaging underserved populations, MaineDOT staff is committed to:

- Planning public meetings and hearings well in advance and publicizing them in diverse media, flyers and on the MaineDOT website.
- Ensuring that meeting notices state that the meeting uses accessible-format materials.
- Determining the existence of non-English languages and other cultural characteristics that could inhibit public participation and offering appropriate accommodations to reduce any barriers.
- Accepting both verbal and written comments in languages other than

English.

- Holding meetings and conducting outreach in the affected neighborhoods, using community centers as meeting locations and venues for informal outreach.
- Using varied meeting times and locations to accommodate the schedule, transportation, and child-care limitations of community members.
- Holding meetings at convenient locations that are accessible and welcoming to all, including those with disabilities. This includes providing appropriate room set-up and, when requested, alternate formats of handouts (e.g., large-print materials) and audio equipment.
- Making available alternative methods for two-way flow of information and input between MaineDOT and people who are not likely to attend meetings.
- Using various illustration and visualization techniques to convey the project information including, but not limited to, charts, graphs, photos, maps, and the Internet.
- Reaching out to others, both internally and externally, with expertise in contacting and connecting with underserved populations to obtain advice and information about best practices and effective techniques.

Public Notice

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

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

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

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

MaineDOT

Integrity • Competence • Service

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

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

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

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

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

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

خدمات الترجمة اللغة متاحة عند الطلب

In addition, the MaineDOT's Civil Rights brochure below, "Know Your Rights" is posted on the MaineDOT website and on our Title VI Brochure Complaint Procedure and is made available at all public meetings conducted by MaineDOT, is available in English, French, Spanish and Chinese and can be made available in other languages for the benefit of LEP populations on request.

Front of the brochure:

Call Us with Questions

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

mainedot.gov/civilrights/title-vi

Language translation services available upon request.

Services de traduction de langue disponibles sur demande.

Servicios de traducción disponibles bajo petición.

要求提供的 语言翻译服务。

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

بیلطلا دنن عحاتم غللا تمجرتلا تامدخ

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



MaineDOT

Maine Department of Transportation
Civil Rights Office

16 State House Station
Augusta, Maine 04333-0016

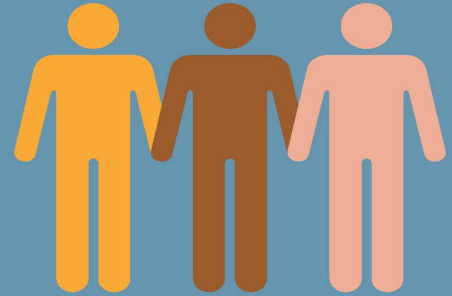
Phone: 207-624-3056

TTY Users Dial Maine Relay 711



mainedot.gov

Know YOUR Rights



MaineDOT
Civil Rights Office

TITLE VI PROGRAM of the Civil Rights Act

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

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



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

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

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

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

How to File a Complaint

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

Be prepared to fill in:

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

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

MaineDOT Civil Rights Office

16 State House Station
Augusta, Maine 04333-0016

207-624-3056



Back of Brochure

Notification to Beneficiaries – Website

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

- MaineDOT’s Title VI Implementation Plan
- 2021 Demographic Profile of Maine (to be updated as demographic information becomes available)
- How to File a Discrimination Complaint
- Complaint Form
- Foreign Language Interpretation Information
- Language Identification Card
- Minority and Outreach Contact Information
- Title VI brochure – Know Your Rights
- Nondiscrimination/Title VI Poster
- Minority Populations by County – charts and maps
- FHWA Subrecipient Guide
- 2023 Title VI Assurances
- Form 1273 for construction contract

IX. REVIEW OF MAINEDOT DIRECTIVES

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

X. COMPLIANCE AND ENFORCEMENT PROCEDURE

Noncompliance Procedure Specified in 23 CFR §200.9

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

Remedial Action

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

Effecting Compliance

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

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

XI. LIMITED ENGLISH PROFICIENCY (Language Access Plan)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1) The number or proportion of LEP persons served or encountered in the eligible service population. This information consisted of Census data relevant to the service area of each program or activity reviewed.

- 2) The frequency with which LEP individuals come in contact with the program, activity, or services. This information was based on anecdotal evidence and statistical records relating to previous encounters with LEP persons.
- 3) The nature and importance of the program, activity, or service.
- 4) Resources Available and Costs.

A. Results of the Four Factor Analysis (see Appendix VIII for complete text of MaineDOT's 2023 Four Factor Analysis).

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

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

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

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

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

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

Maine		
Language Spoken	Estimated Number of Speakers	Percent of Total
Total:	1,293,114	100
Speak only English	1,216,827	
Spanish:	11,920	
Speak English "very well"	9,208	
Speak English less than "very well"	2,712	0.209726289
French, Haitian, or Cajun:	33,695	
Speak English "very well"	27,260	
Speak English less than "very well"	6,435	0.497635939
German or other West Germanic languages:	4,185	
Speak English "very well"	3,695	
Speak English less than "very well"	490	0.037893024
Russian, Polish, or other Slavic languages:	2,801	
Speak English "very well"	2,297	
Speak English less than "very well"	504	0.038975682
Other Indo-European	6,209	
Speak English "very well"	4,647	
Speak English less than "very well"	1,562	0.120793681
Korean:	643	
Speak English "very well"	451	

Speak English less than "very well"	192	0.014847879
Chinese (incl. Mandarin, Cantonese):	3,102	
Speak English "very well"	1,731	
Speak English less than "very well"	1,371	0.106023135
Vietnamese:	832	
Speak English "very well"	303	
Speak English less than "very well"	529	0.040909
Tagalog (incl. Filipino):	1,026	
Speak English "very well"	771	
Speak English less than "very well"	255	0.019719839
Other Asian and Pacific Island languages:	3,026	
Speak English "very well"	1,876	
Speak English less than "very well"	1,150	0.088932608
Arabic:	1,438	
Speak English "very well"	902	
Speak English less than "very well"	536	0.041450328
Other and unspecified	7,410	
Speak English "very well"	5,005	
Speak English less than "very well"	2,405	0.185985149

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

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

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

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

MaineDOT has implemented a survey process whereby it asks employees/subrecipients and community partners the following questions specifically for Factor 2 of its LAP:

Employee/Subrecipient Survey Questions:

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

passengers?

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

Community Partner Survey Questions:

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

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

Survey results can be provided upon request.

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

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

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

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

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

Language Assistance Resources

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

Document Translation

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

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

External Resources

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

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

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

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

MaineDOT Accommodation Requests for Meetings Guidance for MaineDOT Meeting Organizers

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

Available Accommodations Based on the Type of Meeting/Event

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

- Language Translation.

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

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

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

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

Contacts/Resources for Providing Accommodation Requests Language Translation, American Sign Language Translation, and Live Closed Captioning

For these services, the current contract we have set up for captioning services is with TotalCaption, their contract was recently renewed. Try to give them seven days' notice, but they're pretty good at handling short notice requests as well.

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

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

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

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

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

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

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

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

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

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

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

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

Safe Harbor Stipulation

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

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

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

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

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

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

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

MaineDOT Places the Following Requirements on Subrecipients:

Subrecipients shall take steps to ensure that LEP individuals riding on transit in minority

service areas will have access to bus schedules published in languages other than English, including, but not limited to French, Spanish, and Chinese (including Mandarin and Cantonese), depending upon the needs of the transit area.

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

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

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

The Flashcards can be found on the web via the following link:
http://www.maine.gov/dhhs/documents/Language_ID_Card.pdf

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

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

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

MaineDOT requires that subrecipients take other reasonable steps, where necessary.

Other reasonable steps will depend on:

- The number and proportion of LEP persons potentially served by the recipient's programs or activities and the variety of languages spoken in the recipient's service area.
- The frequency with which LEP individuals are affected by the program or activity.
- The importance of the effect of the recipient's program on LEP individuals.
- The resources available to the recipient and the urgency of the situation.
- The level of services provided to fully English proficient people.
- Whether LEP persons are being excluded from services or provided a lower level of services.
- Whether the recipient has adequate justification for restrictions, if any, on special language services or on speaking languages other than English.

As noted in the Four Factor analysis, several subrecipients have provided schedules in languages other than English.

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

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

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

- **Planning Process:** Subrecipients are directed to follow all guidelines above and make use of the Language Translation Card Guide.
- **Public Meetings:** Subrecipients are directed to outreach ahead of time, find out how to communicate with the affected area, and make use of Language Translation Cards.
- **Property Acquisition:** Subrecipients are directed to bring Language Translation Cards and arrange for translators.
- **Construction:** Subrecipients are directed to have Language Translation Cards on hand and arrange for translators.
- **Transit Programs:** Subrecipients are directed to use Language Translation Cards as a polling tool, become familiar with languages used

on the routes, consider publishing in most predominant languages other than English, and obtain a professional language translation phone service. For public processes and planning, subrecipients are directed to refer to the US DOT Guide.

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

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

D. Description of How MaineDOT provides Translation of Vital Documents

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

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

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

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

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

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

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

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

https://www.maine.gov/mdot/civilrights/docs/title6/Language_ID_Card.pdf

Training Summary

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

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

Internal Training:

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

to the specific Federal Program Area.

External Training:

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

External Civil Rights Training

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

Training Provided by the Office of Civil Rights

Training Topic(s)	Date
Locally Administered Projects Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	November 2, 2022
Bureau of Project Development Construction Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	March 24, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 4, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 5, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 7, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 8, 2022

Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 11, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 26, 2022
Documentation Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	April 27, 2022
Locally Administered Projects Training (Including overview of Civil Rights, Title VI, DBE, ADA and OJT training)	May 4, 2022

Training Attended by the Office of Civil Rights

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

Department of Labor Minimum Wage Executive Order Seminar	January 27, 2022
OFCCP Contractor Portal	February 1, 2022
Improving Diversity and Inclusion Programs in Public Transportation	February 3, 2022
Stream-lining the Way You Get Data	February 10, 2022
Invisible Warriors: African-American Women in WWII	February 14, 2022
DBE Training	February 14, 2022
DBE Training	February 15, 2022
DBE Training	February 16, 2022
DBE Training	February 17, 2022
How to Gain Richer Feedback and Engagement from the Public	February 17, 2022

EMDC Youth Information Session for Employers	February 22, 2022
Transportation Diversity, Equity and Inclusion Initiative	February 23, 2022
Creating Custom Tables using the American Community Survey Public Use Microdata Sample	February 23, 2022
Ending Retaliation, Securing Racial and Economic Justice in the Workplace	February 24, 2022
Equity in Focus	February 24, 2022
Davis-Bacon Compliance and the Bipartisan Infrastructure Law	February 28, 2022
USDOT DBE Contract Goal Setting Webinar	March 2, 2022
Understanding ADA	March 8, 2022
Using Population Estimates and Projections	March 10, 2022
Disadvantaged Business Enterprise (DBE) Program – New NAICS Code Official Guidance	March 10, 2022
Climate and Economic Justice Screening Tool	March 10, 2022
TPM Webinar	March 16, 2022
Public Meeting Accommodations	March 17, 2022
Service Contract Act (SCA) Compliance	March 30, 2022
Building Skills for Successful Transportation Program Delivery	April 12, 2022
Building Skills for Successful Transportation Program Delivery	April 13, 2022
CEJST Public Listening Session	April 15, 2022
Elation System Training for Contractors	April 19, 2022
DBE Prompt Payment	April 20, 2022
U.S. Census Bureau Top 3 Tools Tour	April 28, 2022
Reimagining Equity for Workers with Gaps in Employment History	April 28, 2022
Elation System Training for MaineDOT Staff	May 10, 2022
U.S. Census Bureau To Nest, or Not to Nest, That is The Quest	May 12, 2012
Good Faith Effort	May 17, 2022

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

The United States Department of Transportation (USDOT)

Standard Title VI / Nondiscrimination Assurances

DOT Order No. 1050.2A

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

Statutory/Regulatory Authorities

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

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

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to assure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from DOT, including the 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 **Highway Program**:

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

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

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

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

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

b. the period during which the Recipient retains ownership or possession of the property.

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

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

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

Maine Department of Transportation

By 
Bruce A. Van Note, Commissioner

Dated 9/19/23

Encl.: Appendices A, B, C, D and E

APPENDIX A

Performance Requirements

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

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, *Federal Highway 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 **49 U.S. Code §5334**, the Regulations for the Administration of the **Federal Aid Highway Program**, and the policies and procedures prescribed by the **FHWA** of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the **Maine Department of Transportation** all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

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

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

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

APPENDIX C

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

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

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

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

APPENDIX D

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

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

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

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

APPENDIX E

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

Pertinent Non-Discrimination Authorities:

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

MAINE DEPARTMENT OF TRANSPORTATION NONDISCRIMINATION POLICY STATEMENT

TITLE VI (FHWA)

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


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

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

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

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

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



Bruce A. Van Note, Commissioner
Maine Department of Transportation


Dated: 9/19/23

FEDERAL HIGHWAY ADMINISTRATION CIVIL RIGHTS ASSURANCE

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

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

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



Bruce A. Van Note, Commissioner
Maine Department of Transportation

DATE: 9/19/23

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

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Public Involvement

1. Does any written information (i.e. letters and notices) include appropriate Title VI language?

☐ Yes

☐ No

Provide documentation and comments:

Americans with Disabilities Act Accessibility Guidelines (ADAAG/ADA) Compliance

2. Describe how traffic engineers identify the need for audible and vibro-tactile devices in planned pedestrian crossings? Is statistical data of disabled persons in the impacted area obtained and reviewed?

☐ Yes

☐ No

Describe:

3. Is a current inventory of installed signals and accessibility features maintained so that a compliance status is readily available?

☐ Yes

☐ No

4. Are crosswalk pavement markings and pedestrian signals only installed at crossings that meet ADAAG technical specifications? (e.g. curb ramps with tactile surfaces)

☐ Yes

☐ No

5. Do permitted crossings meet ADAAG technical specifications? (e.g. curb ramps with tactile surfaces)

☐ Yes

☐ No

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

List:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# 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 LAP project plans reviewed for ADA compliance	
# of State design plans reviewed for ADA compliance	
# of LAP 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	
# LEP request received	
# LEP 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

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

3. Provide any special outreach or affirmative action conducted this quarter.

4. Is technical information (bids, RFQs, RFPs, RFIs, Prequalifications, etc.) available in formats and at places and times conducive to review by minority and low-income persons?

☐ Yes

☐ No

What procedures are in place to provide information to persons with limited English proficiency, sight-impaired persons, and for persons without formal education?

Provide documentation and comment:

5. Does public information (letters, notices, etc.) contain Title VI language?

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

or national origin in consideration for an award.”

Refer to page 26 of the Title VI Implementation Plan FFY 2022 found at
<https://www.maine.gov/mdot/civilrights/title-vi/>

- ☐ Yes
- ☐ No

Provide documentation and comment:

6. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

7. Is DBE participation monitored and reported to the Departments DBE Officer for ALL contracts?

- ☐ Yes
- ☐ No

Describe:

8. What actions have been taken to identify sub-contracting/contractor/consultant opportunities and solicit interest, bids, and quotes from DBEs?

Provide documentation and comment:

9. Are all contracting opportunities communicated to the DBE Officer?

☐ Yes

☐ No

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

Provide documentation and comment:

11. Are all contracts reviewed for appropriate Title VI language and Form FHWA-1273?

☐ Yes

☐ No

# 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	
# State Employees trained	
# Federal Employees trained	
Are all contracts reviewed for appropriate Title VI language and Form FHWA-1273?	
# 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
Environment**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Public Information

1. Is information regarding project impacts and mitigation measures provided at public meetings/hearings?

☐ Yes
☐ No

2. Does any written information provided include appropriate Title VI language?

☐ Yes
☐ No

Identification of Social, Economic, and Environmental (SEE) Impacts

1. To what extent is statistical data regarding minority and low-income populations used to identify the potential for disproportionate impacts?

Describe:

2. What procedures are in place to identify impacts such as: access to services/facilities; disruption of community cohesion; disruption of people, businesses, and farms; changes in tax base and property values; traffic; noise; necessity for relocation; diminished quality of water, air, or natural environment?

Describe:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

2. How is NEPA documentation maintained for Class I and Class III environmental assessments and analysis?

Describe:

3. How are records maintained that reflect the identification of and implementation of mitigation measures?

Describe:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# Webinar public meetings	
# of traditional public meetings	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# of meetings held in low income or minority areas	
# of PIPs developed during reporting period	
# LEP request received and services provided during traditional meetings/hearings	
# of EA and EIS and/or Corridor Studies reviewed	
# of EA, EIS and/or Corridor Studies where underserved communities were identified	
# of EA, EIS and/or Corridor Study plan amendments impacting underserved communities	
# of Revaluations reviewed for potential EJ/Title VI issues	
# 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**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Addressing Disproportionate Impact

1. What procedures are in place to ensure that maintenance operations are conducted in a fair and uniform manner?

Describe:

2. Is the level of service and delivery the same for all segments of the population served?

Describe:

Americans with Disabilities Act Accessibility Guidelines (ADAAG/ADA) and Compliance

1. Except for routine maintenance, what procedures are in place to ensure that necessary alterations are incorporated into each project to ensure ADAAG compliance?

Describe:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# of Title VI complaints received	
# of informal (verbal) complaints	
# of formal (written) complaints	
# of unresolved complaints sent to Civil Rights Office	
# of maintenance work orders issued this quarter	
# of maintenance work orders issued in primarily low income and minority 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**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

3. Provide any special outreach or affirmative action conducted this quarter.

Communication of Federal Contract Requirements

1. What process is undertaken to ensure that the Civil Rights Office is informed of municipally managed bid/contract schedules (to ensure contract review and project monitoring)?

Describe (provide samples of correspondence if appropriate):

2. Has the Title VI Coordinator (Civil Rights Office) reviewed the current language used in all municipal agreements?

☐ Yes

☐ No

Describe (provide specific examples):

3. How are Federal contract EEO requirements communicated to municipalities/sub-recipients and monitored for compliance?

Describe (provide samples of correspondence if appropriate):

4. What efforts have been undertaken to train municipal managers of State and Federal compliance requirements?

Please list number of people trained/attended:

Municipal Attendees:

Federal Employees:

State Employees:

Public:

Describe (attach training/meeting agendas):

Americans with Disabilities Act Accessibility Guidelines (ADAAG/ADA) **Compliance**

1. What procedures are in place to identify and incorporate design criteria mandated by the Architectural Barriers Act of 1968 to ensure pedestrian and other facilities meet minimum ADAAG accessibility standards?

Describe:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

2. Is there record of internal audits that municipalities have conducted in the past 12 months?

☐ Yes

☐ No

List reviews conducted and date:

3. Has a Goals and Accomplishments Report been submitted to the Title VI Coordinator (Civil Rights Office) within the past 12 months?

☐ Yes

☐ No

List municipalities who have submitted and date:

4. Are pre-Federal-assistance reviews conducted before municipal agreements are approved?

☐ Yes

☐ No

List reviews conducted this year:

Contracts

1. What procedures are in place to encourage and monitor DBE participation in municipal agreements?

Describe:

2. Is there a process in place whereby the DBE Liaison Office monitors the municipal bid/selection process so that contracting opportunities are publicized to DBEs in a timely manner?

☐ Yes

☐ No

Describe:

# 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

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

3. Provide any special outreach or affirmative action conducted this quarter.

Public Involvement/Participation

1. What actions have been taken to identify and include LEP, minority and low-income persons and communities in the notification process for public meetings and public review of agency documents? (examples include demographics studies, use of LEP or minority utilized media, etc.)

Provide documentation and comments:

2. What measures have been taken to contact minority groups or leaders to identify information needs and planning/programming issues of concern?

Provide documentation and comments:

3. Is technical information available in formats and at places and times conducive to review by LEP, minority and low-income persons?

☐ Yes

☐ No

What procedures are in place to provide information to sight-impaired persons, non-English speakers, and for persons without formal education?

Provide documentation and comments:

4. Are Citizens Advisory Committees (CACs) representative of populations with the region?

☐ Yes

☐ No

If not, what outreach efforts have been used to solicit participation from underrepresented groups?

Provide documentation and comments:

5. Do meeting formats encourage participation of LEP, minority and low-income people/communities, and are accommodations made for disabled persons?

- ☐ Yes
☐ No

What methods are used to secure public involvement? (examples include door-to-door canvassing, fact sheets, community/public workshops, information office, exhibits, etc.)

Provide documentation and comments:

Consideration of Input from Minority Groups/Persons

1. Is consideration of input actively demonstrated via newsletters, leaflets, or other mediums that will potentially reach the target group/audience? (Does the recipient inform the public of the importance of their input and how it is used?)

- ☐ Yes
☐ No

Provide documentation and comments:

2. Does public information (letters, notices, etc.) contain Title VI language?

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

Refer to page 26 of the Title VI Implementation Plan FFY 2022 found at <https://www.maine.gov/mdot/civilrights/title-vi/>

- ☐ Yes
- ☐ No

Provide documentation and comments:

Data Collection/Analysis

1. Does the data collected reflect community boundaries, racial and ethnic makeup, income levels, property taxes/appraisal information, community services, schools, hospitals, and shopping areas?

- ☐ Yes
- ☐ No

What sources were used and how?

Provide documentation and comments:

Social, Economic, and Environmental (SEE) Impacts

1. What method is used to ensure that Social, Economic, and Environmental (SEE) impacts are identified at the earliest possible stages?

Provide documentation and comments:

2. Is demographic data reviewed to determine the probability of disproportionate effects on EJ populations?

☐ Yes

☐ No

Describe:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

2. Is there record of external reviews conducted of MPOs and RPCs?

☐ Yes

☐ No

List reviews conducted and date:

3. Do MPOs and RPCs keep record of information pertaining to Citizen Advisory Committee selection criteria and demographic make-up (race, gender, and position within the organization)?

☐ Yes

☐ No

Provide documentation and comment:

4. Do the MPOs and RPCs have established procedures to document the level of participation of Title VI protected group members at Citizen Advisory Committee meetings/hearings when offered in predominantly LEP, minority or low-income communities?

☐ Yes

☐ No

Provide documentation and comment:

# Webinar public meetings	
# of traditional public meetings	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# of meetings held in low income, LEP or minority areas	
# of PIPs developed during reporting period	
# LEP request received and services provided during traditional meetings/hearings	
# of EA and EIS and/or Corridor Studies reviewed	
# of EA, EIS and/or Corridor Studies where underserved communities were identified	
# of EA, EIS and/or Corridor Study plan amendments impacting underserved communities	
# of Revaluations reviewed for potential EJ/Title VI issues	
# 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)**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Public Involvement

1. Does public involvement meet the needs of minority and low-income communities (In terms of time, location, setting)?

☐ Yes

☐ No

Comments:

2. Are provisions made to accommodate LEP and disabled persons?

☐ Yes

☐ No

Comments:

3. What efforts are made to identify and encourage participation of LEP, minority and low-income persons/communities?

Describe:

4. Does any written information (i.e. letters and notices) include appropriate Title VI language?

☐ Yes

☐ No

Provide documentation and comments:

5. What public involvement techniques do project teams utilize to identify Title VI issues of discriminatory potential as early as possible?

Provide documentation and comments:

6. What type of informal contact is used to encourage participation of minorities, persons with limited English proficiency, low-income, and persons with limited education?

Describe (provide specific examples):

7. Are informal open-forum public meetings/hearings used that allow one-on-one comments to a recorder?

- ☐ Yes
☐ No

Identification of Social, Economic, and Environmental (SEE) Impacts and Americans with Disabilities Act Accessibility Guidelines (ADAAG/ADA) Compliance

Adverse effects may include: limited access to services/facilities; disruption of community cohesion; disruption of people, businesses, and farms; changes in tax base and property values; traffic; noise; necessity for relocation; diminished quality of water, air, or natural environment.

1. Are disproportionate effects on minority, LEP and low-income communities identified?

- ☐ Yes
☐ No

Describe:

2. What is the process to ensure that measures are taken to avoid or mitigate impacts?

Describe:

3. In regards to Questions 1 and 2, is this, to a greater extent, a discovery process based on input from those that participate?

☐ Yes

☐ No

4. What measures are in place to ensure that all persons working on the project are trained and cognizant of potential Title VI impacts during construction?

Describe:

5. What procedures are in place to identify and incorporate design criteria mandated by the Architectural Barriers Act of 1968 to ensure pedestrian and other facilities meet minimum accessibility standards?

Describe:

Documentation

1. Has the level of participation of minorities, LEP persons and low-income persons at public meetings been documented?

☐ Yes

☐ No

Provide documentation and comments:

2. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

List:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# 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 meetings held in low income of minority areas	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# LEP request received for services provided during traditional meetings/hearings	
# LEP 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**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Public Involvement

1. What outreach efforts have been conducted to advise property owners, tenants and others of their rights and options regarding negotiation, relocation, etc.?

Describe:

2. Do letters and notices include appropriate Title VI language

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

Refer to pages 26 to 33 (Appendices A and E) of the Title VI Implementation Plan FFY 2022 found at <https://www.maine.gov/mdot/civilrights/title-vi/>

- ☐ Yes
☐ No

3. What special efforts (outreach) have been made to contact and encourage participation of minorities, persons with limited English proficiency and low-income persons communities at public hearings?

Describe (provide specific examples):

Preventing Discrimination

1. What procedures are in place to ensure that property values and communications associated with appraisal and negotiation operations do not have a disparate impact on minority, persons with limited English proficiency or low-income populations?

Describe:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

2. Has the level of participation of minorities, persons with limited English proficiency and low-income persons at hearings been documented?

☐ Yes

☐ No

Provide documentation and comments:

3. Is statistical data maintained concerning the race, color, national origin, age, income and disability status of relocates, or otherwise impacted residents?

☐ Yes

☐ No

Provide documentation:

Consultant Contracts, Deeds, Permits

1. What procedures are in place to identify and encourage participation of DBE appraisers?

Describe:

2. What actions have been taken to identify available/prospective DBEs to perform sub-contract work such as personal services contracts, real estate negotiation, relocation, and property management?

Describe:

3. Do all deeds, permits and leases include appropriate Title VI clauses [Refer to pages 26 to 33 (Appendices A and E) of the Title VI Implementation Plan FFY 2022 found at <https://www.maine.gov/mdot/civilrights/title-vi/>]

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

- ☐ Yes
☐ No

Did the Department have ROW activities this quarter (appraisal, acquisition and/or relocation only)?	Yes	No
Breakdown of Appraisers (# by race/gender/ethnicity)	Male	Female
African American		
Hispanic/Latino		
American Indian/Alaskan Native		
Asian		
Native Hawaiian/Other Pacific Islander		
2 or More Ethnicities		
White		
# of Relocation comment cards provided		
# of Relocation comment cards returned		
# of Relocation cards returned from primarily low income or minority area zip codes		
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement		
# of complaints received		
# of informal (verbal) complaints		
# of formal (written) complaints		
# of unresolved complaints sent to Departments Title VI Coordinator		
# of public meetings this quarter		
# 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
Safety

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

Public Involvement

1. Does public involvement meet the needs of minority, limited English proficiency and low-income communities (In terms of time, location, setting)?

☐ Yes

☐ No

Comments:

2. Are provisions made to accommodate disabled persons?

☐ Yes

☐ No

Comments:

3. Does any written information (i.e. letters and notices) include appropriate Title VI language?

☐ Yes

☐ No

Provide documentation and comments:

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

List:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# 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 meetings held in low income of minority areas	
# of public meeting or information notices reviewed for compliant Title VI/Nondiscrimination statement	
# LEP request received	
# LEP 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
Traffic**

Bureau/Office _____

Title VI Liaison: _____

Contact Info:

e-mail: _____

Phone: _____

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)**

1. Were any Title VI issues (positive or unfavorable) identified this quarter?

- ☐ Yes
- ☐ No

Explain:

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

**Americans with Disabilities Act Accessibility Guidelines (ADAAG/ADA) and
Manual on Uniform Traffic Control Devices (MUTCD) Compliance**

1. Describe how traffic engineers identify the need for audible and vibro-tactile devices in planned pedestrian crossings? Is statistical data of disabled persons in the impacted area obtained and reviewed?

- ☐ Yes
☐ No

Describe:

2. How are State-owned systems managed to ensure compliance with the most current MUTCD technical specifications?

Describe:

3. Is a current inventory of installed signals and accessibility features maintained so that a compliance status is readily available?

- ☐ Yes
☐ No

4. Are crosswalk pavement markings and pedestrian signals only installed at crossings that meet ADAAG technical specifications? (e.g. curb ramps with tactile surfaces)

- ☐ Yes
☐ No

5. Do permitted crossings meet ADAAG technical specifications? (e.g. curb ramps with tactile surfaces)

☐ Yes

☐ No

Documentation

1. What documentation is maintained reflecting Title VI related correspondence (e-mail, notes, memorandums), training, and other activities?

Describe:

Consultant Contracts

1. What actions have been taken to identify sub-contracting/consulting opportunities and solicit interest, bids, and quotes from DBEs?

Describe:

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

☐ Yes

☐ No

# 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	
# State Employees trained	
# Federal Employees trained	
# of maintenance work orders issued this quarter	
# of maintenance work orders issued in primarily low income and minority areas	
# of translation services provided	
# of interpreter services provided	
Cost of translation and interpreter services provided this quarter	\$

Subrecipient Reviewed: _____ Date(s) of Desk Audit _____

Reviewer(s) _____

- ☐ Title VI/Nondiscrimination Policy Statement
- ☐ Title VI/Nondiscrimination Assurances
- ☐ Name and position of Title VI/Nondiscrimination Coordinator
- ☐ Title VI/Nondiscrimination Plan
- ☐ Procedures for processing external discrimination complaints
- ☐ A list of external discrimination complaints and lawsuits
- ☐ Any Accommodations for Limited English Proficient Persons
- ☐ Addressing Environmental Justice in minority populations and low-income populations
- ☐ Ensuring nondiscrimination in the public participation process
- ☐ Collecting and analyzing data to ensure nondiscrimination in programs and activities
- ☐ Process for ensuring that solicitations for bid/requests for proposals contain the Title VI/Nondiscrimination Assurance paragraph
- ☐ Process for ensuring subcontracts contain the appropriate contract provisions and language from the Title VI Assurances
- ☐ Process for Ensuring nondiscrimination in the award of contracts
- ☐ Developing a Title VI/Nondiscrimination Annual Work Plan & Accomplishment Report

SUB-RECIPIENT TITLE VI COMPLIANCE ASSESSMENT TOOL

23 Code of Federal Regulations (CFR) Part 200.9 (b)(7) requires that the Maine Department of Transportation (MaineDOT) conduct periodic reviews of cities, planning agencies and other recipients of federal-aid highway funds, including locally public agencies, to ensure that they are complying with Title VI of the Civil Rights Act of 1964. Title VI states that “no person in the United States shall be excluded from participation, denied the benefits of, or be subjected to discrimination in any Federally-funded program, policy or activity on the basis of race, color or national origin.”

MaineDOT has developed this assessment as a means of determining sub-recipient compliance; helping sub-recipients understand their Title VI responsibilities; and assisting MaineDOT in planning future training and technical assistance.

This assessment is part of MaineDOT’s Title VI review process and has been designed to take only a few minutes of your time. Please fax (207-624-3021) or mail (16 State House Station, Augusta, ME 04333-0016) the completed questionnaire with attachments to: Sherry Tompkins, Director of Civil Rights, and Mary Bryant EEO Specialist no later than **September 15, 2023**.

Questions or concerns may be emailed to: sherry.tompkins@maine.gov and mary.bryant@maine.gov you may also reach Sherry by phone at 207-624-3066 and Mary at 207-624-3056.

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 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 sub-contracts, including third-tier contracts? _____
5. Who is the Title VI contact person for your agency? _____. Does this person accept complaints from the public? _____. If not, 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. _____
8. Has your agency made the public aware of the right to file a complaint? _____ If so, by what mechanism _____. Please attach a copy.
9. Does your agency provide free translation services for persons with Limited English Proficiency (LEP)? _____. Please explain _____
10. In the past twelve (12) months, what has your agency done to receive and consider input from all citizen groups, especially minority, low income, disabled and transit-dependent? 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 sub-contracts? (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 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 and a MaineDOT representative will respond. _____
15. Would your agency like Title VI training or other Civil Rights technical assistance from MaineDOT? _____. 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? Are you completing these on an annual basis as required? _____



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

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

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

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

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

AMERICAN COMMUNITY SURVEY LANGUAGE CODE LIST

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

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

Haitian (1053-1056)¹

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

West Germanic languages (1110-1139, 1234)

	<i>German (1110-1124)</i>
1110	German (deu)
1111	Bavarian (bar)
1112	Hutterite German (geh)
1113	Low German (nds)
1114	Plautdietsch (ptd)
1115	Swabian (swg)
1120	Swiss German (gsw)
1121	Upper Saxon (sxu)
1122	Limburgish (lim)
1123	Luxembourgish (ltz)
1125	Pennsylvania German (pdc)
1130	Yiddish (macrolanguage) (yid)
1131	Eastern Yiddish (ydd)
1132	Dutch (nld)
1133	Vlaams (vls)
1134	Afrikaans (afr)
1135	Northern Frisian (frr)
1136	Western Frisian (fry)
1234	Scots (sco)

Scandinavian languages (1140-1146)

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

1147	Belgium N.E.C.
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Romance languages (1155-1227)

Italian (1155-1169)

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

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

French (1170-1175)

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

1176	Occitan (post 1500) (oci)
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Spanish (1200-1205)

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

1206	Catalan (cat)
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Portuguese (1069-1073, 1210-1217)

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

1218	Aromanian (aen)
1220	Romanian (ron)
1221	Istro Romanian (ruo)
1223	Ladin (lld)
1225	Romansh (roh)

Celtic languages (1228-1233)

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

1235	Modern Greek (1453-) (ell)
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¹ Although they are linguistically Creole languages, some French-based Creoles (Guadeloupean Creole French, Saint Lucian Creole French, and Haitian) and Portuguese-based creoles (Kabuverdianu and Upper Guinea Crioulo) are included under Indo-European languages in standardized tabulations, in order to maintain comparability with ACS estimates prior to 2016.

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

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

Slavic languages (1250-1280)

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

Baltic languages (1281-1287)

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

1288 Armenian (hye)

Indo-Iranian languages (1289-1543)

Persian (1289-1307)

1290 Persian (macrolanguage) (fas)
 1292 Dari (prs)
 1295 Iranian Persian/Farsi (pes)
 1300 Tajik (tgk)
 1302 Bukharic (bhh)
 1303 Hazaragi (haz)
 1304 Judeo-Persian (jpr)

 1308 Judeo-Tat (jdt)
 1309 Northern Luri (lcr)
 1310 Parsi (prp)
 1311 Zoroastrian Dari (gbz)
 1312 Dezfūli (def)
 1315 Kurdish (macrolanguage) (kur)
 1316 Central Kurdish (ckb)
 1317 Northern Kurdish (kmr)
 1320 Zaza (macrolanguage) (zza)
 1321 Baluchi (macrolanguage) (bal)
 1322 Eastern Balochi (bgp)
 1323 Southern Balochi (bcc)
 1325 Ossetian (oss)
 1327 Pushto (macrolanguage) (pus)

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

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

1340 India N.E.C.

Hindi (1341-1359)

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

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

Bengali (1380-1387)

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

1388 Halbi (hlb)
 1400 Rohingya (rhg)

Punjabi (1420-1429)

1420 Panjabi (pan)
 1421 Lahnda (macrolanguage) (lah)
 1422 Western Panjabi (pnb)
 1423 Pahari-Potwari (phr)
 1424 Northern Hindko (hno)
 1425 Southern Hindko (hnd)
 1426 Saraiki (skr)

 1430 Goan Konkani (gom)
 1435 Konkani (individual language) (knn)
 1440 Marathi (mar)
 1442 Od (odk)
 1450 Gujarati (guj)
 1455 Saurashtra (saz)
 1460 Bhojpuri (bho)
 1463 Magahi (mag)
 1467 Maithili (mai)
 1470 Rajasthani (raj)
 1472 Bagri (bgq)
 1474 Dhatki (mki)
 1478 Lambadi (lmn)
 1480 Marwari (mwr)
 1481 Marwari (India) (rwr)
 1482 Dhundari (dhd)
 1486 Bodo Parja (bdv)
 1488 Desiya (dso)
 1490 Oriya (individual language) (ory)

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

ASIAN AND PACIFIC ISLAND LANGUAGES (1643-3798)

Turkic languages (1643-1684)

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

Mongolic languages (1685-1698)

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

Tungusic languages (1699-1710)

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

Dravidian languages (1711-1798)

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

1799 Burushaski (bsk)

Austro-Asiatic languages (1800-1969)

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

Mon-Khmer languages (1855-1949)

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

1950 Muong (mtq)
 1960 Vietnamese (vie)

Sino-Tibetan languages (1970-2429)

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

Tibeto-Burman languages (2060-2429)

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

Burmese (2160-2179)

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

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

Kuki-Chin languages (2220-2299)

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

2290 Zyphe Chin (zyp)

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

Karen languages (2350-2429)

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

Tai-Kadai languages (2430-2524)

Thai (2430-2474)

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

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

Hmong-Mien languages (2525-2559)

2525 Iu Mien (ium)

Hmong (2535-2559)

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

Japonic languages (2560-2568)

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

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

Siberian languages (2577-2589)

2577 Koryak (kpy)
2579 Itelmen (itl)

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

Austronesian languages (2590-3798)

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

Philippine languages (2870-3219)

2870 Pampanga (pam)
 2880 Bolinao (smk)
 2890 Botolan Sambal (sbl)
 2900 Sambal (xsb)

Tagalog (2910-2939)

2910 Filipino (fil)
 2920 Tagalog (tgl)

2940 Mandaya (mry)
 2950 Cebuano (ceb)
 2960 Hiligaynon (hil)
 2970 Masbatenyo (msb)
 2980 Waray (Philippines) (war)
 2990 Aklanon (akl)
 3000 Cuyonon (cyo)
 3010 Kinaray-A (krj)
 3020 Butuanon (btw)
 3030 Tausug (tsg)
 3040 Surigaonon (sgd)
 3050 Bikol (macrolanguage) (bik)
 3055 Central Bikol (bcl)

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

Micronesian languages (3220-3419)

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

Polynesian languages (3420-3798)

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

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

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

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

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

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

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

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

Uralic languages (1565-1602)

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

Caucasian languages (1603-1642)

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

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

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

Afro-Asiatic languages (4500-4899)

Semitic languages (4500-4644)

Arabic (4500-4544)

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

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

4645 Coptic (cop)

Berber languages (4660-4719)

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

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

Chadic languages (4720-4789)

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

Cushitic languages (4790-4899)

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

Omoti languages (4860-4899)

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

Nilo-Saharan languages (4900-5119)

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

4990	Luo (Kenya and Tanzania) (luo)	5235	Meru (mer)
4995	Anuak (anu)	5240	Embu (ebu)
5000	Luwo (lwo)	5245	Kamba (Kenya) (kam)
5005	Shilluk (shk)	5248	Giryama (nyf)
5010	Mabaan (mfz)	5250	Sagalla (tga)
5015	Bari (bfa)	5255	Sukuma (suk)
5020	Kakwa (keo)	5260	Nyamwezi (nym)
5030	Otuho (lot)	5265	Hehe (heh)
5035	Masai (mas)	5270	Pangwa (pbr)
5040	Teso (teo)	5275	Zigula (ziw)
5045	Karamojong (kdj)	5278	Mushungulu (xma)
5048	Turkana (tuv)	5280	Kongo (macrolanguage) (kon)
5055	Nobiin (fia)	5281	Koongo (kng)
5060	Kanuri (macrolanguage) (kau)	5283	Laari (ldi)
5061	Central Kanuri (knc)	5285	Kimbundu (kmb)
5063	Manga Kanuri (kby)	5290	Haya (hay)
5070	Tedaga (tuq)	5300	Luyia (macrolanguage) (luy)
5075	Zaghawa (zag)	5301	Bukusu (bxk)
5080	Amdang (amj)	5302	East Nyala (nle)
5085	Fur (fvr)	5303	Idakho-Isukha-Tiriki (ida)
5090	Katcha-Kadugli-Miri (xtc)	5307	Logooli (rag)
5095	Kunama (kun)	5310	Saamia (ism)
5100	Maba (Chad) (mde)	5315	Gusii (guz)
5105	Masalit (mls)	5320	Masaaba (myx)
5110	Kibet (kie)	5330	Nyoro (nyo)
5115	Koyraboro Senni Songhay (ses)	5335	Nyankole (nyn)
5117	Zarma (dje)	5340	Chiga (cgg)
5120	Korana (kqz)	5345	Ganda (lug)
5125	Gana (gnk)	5350	Soga (xog)
5127	Nama (Namibia) (ylo)	5355	Gwere (gwr)
5130	Hadza (hts)	5360	Tooro (ttj)
5135	Sandawe (sad)	5365	Kinyarwanda (kin)
<i><u>Niger-Congo languages (5140-6701)</u></i>		5370	Rundi (run)
<i>Bantoid languages (5140-5829)</i>		5375	Fuliiru (flr)
5140	Bantu languages (bnt)	5380	Nyemba (nba)
5145	Samba Daka (ccg)	5385	Luvale (lue)
<i>Swahili (5150-5159)</i>		5390	Lozi (loz)
5150	Swahili (macrolanguage) (swa)	5400	Kaonde (kqn)
5151	Swahili (individual language) (swh)	5405	Luba-Lulua (lua)
5152	Congo Swahili (swc)	5407	Luba-Katanga (lub)
		5410	Lunda (lun)
5160	Ekajuk (eka)	5415	Bemba (Zambia) (bem)
5170	Nkem-Nkum (isi)	5420	Mambwe-Lungu (mgr)
5180	Ejagham (etu)	5425	Lamba (lam)
5185	Bankal (jjr)	5430	Ila (ilb)
5190	Mama (mma)	5435	Lenje (leh)
5195	Kenyang (ken)	5437	Tonga (Zambia) (toi)
5200	Mbe (mfo)	5445	Nyanja (nya)
5205	Venda (ven)	5455	Tonga (Nyasa) (tog)
5210	Bembe (bmb)	5460	Nsenga (nse)
5220	Nyanga (nyj)	5462	Sena (seh)
5225	Mochi (old)	5465	Tumbuka (tum)
5230	Kikuyu (kik)	5470	Makhuwa (vmw)
		5475	Matumbi (mgw)
		5480	Yao (yao)
		5485	Makonde (kde)
		5490	Herero (her)
		5495	Umbundu (umb)

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

Gur languages (6015-6119)

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

*Kwa languages (6120-6249)**Akan (6120-6134)*

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

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

Ijoid languages (6250-6284)

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

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

Defoid languages (6285-6299)

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

Edoid languages (6300-6356)

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

Idomoid languages (6357-6369)

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

Igboid languages (6370-6389)

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

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

Kru languages (6460-6499)

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

6480 Klao (klu)
 6485 Eastern Krahn (kqo)
 6486 Western Krahn (krw)
 6490 Sapo (krn)

 6500 Efik (efi)
 6505 Anaang (anw)
 6510 Ibibio (ibb)
 6515 Ekit (eke)
 6520 Ibino (ibn)
 6525 Obolo (ann)
 6530 Oro (orx)
 6535 Eleme (elm)
 6540 Gokana (gkn)
 6545 Khana (ogo)
 6550 Tee (tkq)
 6555 Abua (abn)
 6560 Agwagwune (yay)
 6563 Kohumono (bcs)
 6565 Legbo (agb)
 6570 Lokaa (yaz)
 6575 Olulumo-Ikom (iko)
 6580 Bete-Bendi (btt)
 6585 Bokyi (bky)
 6590 Baka (Cameroon) (bkc)
 6595 Mayogo (mdm)
 6600 Gbaya (gba)
 6601 Northwest Gbaya (gya)
 6605 Zande (individual language) (zne)
 6610 Day (dai)
 6615 Mbum (mdd)
 6620 Samba Leko (ndi)
 6625 Teme (tdo)
 6630 Kaan (ldl)
 6635 Tula (tul)
 6640 Jamsay Dogon (djm)
 6650 Moro (mor)

 6702 Benin N.E.C.
 6707 Cameroon N.E.C.
 6716 Eritrea N.E.C.
 6717 Ethiopia N.E.C.
 6719 Gambia N.E.C.
 6720 Ghana N.E.C.
 6721 Guinea N.E.C.
 6723 Kenya N.E.C.
 6725 Liberia N.E.C.
 6728 Mali N.E.C.
 6733 Mozambique N.E.C.
 6734 Namibia N.E.C.
 6735 Niger N.E.C.
 6736 Nigeria N.E.C.
 6738 Senegal N.E.C.
 6740 Sierra Leone N.E.C.
 6745 Sudan N.E.C.
 6747 Tanzania N.E.C.
 6750 Uganda N.E.C.
 6795 Africa N.E.C.

Native North American languages (6800-7099)

Aleut languages (6800-6814)

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

Algonquian languages (6815-6848)

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

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

Salish languages (6866-6891)

6866 Quinault (qun)
 6867 Lower Chehalis (cea)

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

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

Eyak-Athabaskan languages (6895-6935)

6895 Athapaskan languages (ath)
 6897 Eyak (eya)
 6898 Tlingit (tli)
 6900 Slave (Athapaskan) (den)
 6902 Chilcotin (clc)
 6903 Ahtena (aht)
 6904 Tanaina (tfn)
 6905 Degexit'an (ing)
 6906 Koyukon (koy)
 6907 Holikachuk (hoi)
 6908 Upper Kuskokwim (kuu)
 6909 Lower Tanana (taa)
 6910 Tanacross (tcb)
 6911 Upper Tanana (tau)
 6912 Northern Tutchone (ttm)
 6913 Southern Tutchone (tce)
 6914 Gwich'in (gwi)
 6915 Han (haa)
 6916 Chetco (ctc)
 6917 Coquille (coq)
 6918 Galice (gce)
 6919 Tolowa (tol)
 6920 Tututni (tuu)
 6921 Hupa (hup)
 6922 Kato (ktw)
 6923 Mattole (mrv)
 6924 Wailaki (wlk)
 6927 Jicarilla Apache (apj)
 6928 Lipan Apache (apl)
 6929 Mescalero-Chiricahua Apache (apm)
 6930 Western Apache (apw)
 6931 Kiowa Apache (apk)
 6933 Navajo (nav)

Kiowa-Tanoan languages (6936-6941)

6936 Kiowa (kio)
 6937 Northern Tiwa (twf)
 6938 Southern Tiwa (tix)
 6939 Tewa (USA) (tew)
 6940 Jemez (tow)

Penutian languages (6942-6976)

6942 Northeast Maidu (nmu)
 6943 Northwest Maidu (mjd)
 6944 Nisenan (nsz)
 6946 Northern Ohlone (cst)
 6948 Coast Miwok (csi)
 6949 Plains Miwok (pmw)
 6950 Central Sierra Miwok (csm)
 6951 Northern Sierra Miwok (nsq)
 6952 Southern Sierra Miwok (skd)
 6955 Nomlaki (nol)
 6956 Patwin (pwi)
 6957 Wintu (wnw)
 6960 Yokuts (yok)
 6961 Kalapuya (kyl)
 6962 Siuslaw (sis)
 6963 Klamath-Modoc (kla)
 6965 Nez Perce (nez)
 6966 Tenino (tqn)
 6967 Umatilla (uma)
 6968 Walla Walla (waa)
 6969 Yakama (yak)
 6971 Chinook (chh)
 6972 Wasco-Wishram (wac)
 6974 Gitksan (git)
 6975 Nisga'a (nsg)
 6976 Tsimshian (tsi)

Hokan languages (6977-7009)

6978 Achumawi (acv)
 6979 Atsugewi (atw)
 6980 Karok (kyh)
 6981 Central Pomo (poo)
 6982 Kashaya (kju)
 6983 Southern Pomo (peq)
 6984 Northern Pomo (pej)
 6985 Eastern Pomo (peb)
 6986 Northeastern Pomo (pef)
 6987 Southeastern Pomo (pom)
 6988 Shasta (sht)
 6989 Washo (was)
 6990 Maricopa (mrc)
 6991 Mohave (mov)
 6992 Quechan (yum)
 6994 Kumiai (dih)
 6995 Cocopa (coc)
 6997 Havasupai-Walapai-Yavapai (yuf)
 7000 Barbareño (boi)
 7001 Ineseño (inz)
 7002 Purisimeño (puy)
 7003 Ventureño (veo)

7004 Cruzeño (crz)
 7005 Obispeño (obi)
 7007 Chimariko (cid)
 7008 Esselen (esq)
 7009 Salinan (sln)

7010 Tonkawa (tqw)
 7011 Yuchi (yuc)

Siouan languages (7013-7027)

7013 Crow (cro)
 7014 Hidatsa (hid)
 7015 Mandan (mhq)
 7016 Catawba (chc)
 7017 Assiniboine (asb)
 7018 Dakota (dak)
 7019 Lakota (lkt)
 7020 Stoney (sto)
 7022 Iowa-Oto (iow)
 7023 Ho-Chunk (win)
 7024 Kansa (ksk)
 7025 Omaha-Ponca (oma)
 7026 Osage (osa)
 7027 Quapaw (qua)

Muskogean languages (7028-7033)

7028 Alabama (akz)
 7029 Koasati (cku)
 7030 Mikasuki (mik)
 7031 Creek (mus)
 7032 Choctaw (cho)
 7033 Chickasaw (cic)

7034 Chitimacha (ctm)
 7036 Yuki (yuk)
 7037 Wappo (wao)
 7039 Eastern Keres (kee)
 7040 Western Keres (kjq)

Iroquoian languages (7041-7050)

7042 Iroquoian languages (iro)
 7043 Mohawk (moh)
 7044 Oneida (one)
 7045 Onondaga (ono)
 7046 Cayuga (cay)
 7047 Seneca (see)
 7048 Wyandot (wya)
 7049 Tuscarora (tus)
 7050 Cherokee (chr)

Caddoan languages (7051-7055)

7052 Caddo (cad)
 7053 Arikara (ari)
 7054 Pawnee (paw)
 7055 Wichita (wic)

7059 Zuni (zun)

Uto-Aztecan languages (7060-7124)

7060 Comanche (com)
 7062 Shoshoni (shh)
 7064 Panamint (par)
 7066 Mono (USA) (mnr)
 7068 Northern Paiute (pao)
 7069 Ute-Southern Paiute (ute)
 7070 Kawaiisu (xaw)
 7072 Cahuilla (chl)
 7074 Cupeño (cup)
 7076 Luiseno (lui)
 7078 Serrano (ser)
 7080 Hopi (hop)
 7082 Tübatulabal (tub)
 7084 Tohono O'odham (ood)
 7100 Southeastern Tepehuan (stp)
 7103 Eastern Huasteca Nahuatl (nhe)
 7105 Michoacán Nahuatl (ncl)
 7109 El Nayar Cora (crn)
 7111 Huichol (hch)
 7115 Central Tarahumara (tar)
 7120 Mayo (mfy)
 7123 Yaqui (yaq)

Central and South American languages (7100-7999)

7125 Matagalpa (mtn)
 7126 Mayangna (yan)
 7127 Mískito (miq)

Mayan languages (7130-7181)

7130 Huastec (hus)
 7135 Chol (ctu)
 7136 Chortí (caa)
 7137 Tzeltal (tzh)
 7138 Tzotzil (tzo)
 7143 Aguacateco (agu)
 7144 Ixil (ixl)
 7150 Mam (mam)
 7152 Tektiteko (ttc)
 7155 Kaqchikel (cak)
 7156 Tz'utujil
 7160 K'iche' (quc)
 7161 Kekchí (kek)
 7162 Poqomam (poc)
 7163 Poqomchi' (poh)
 7166 Chuj (cac)
 7170 Popti' (jac)
 7171 Q'anjob'al (kjb)
 7172 Western Kanjobal (knj)
 7175 Itzá (itz)
 7177 Mopán Maya (mop)
 7179 Lacandon (lac)
 7180 Yucateco (yua)

7182 Purepecha (tsz)
 7185 Huilliche (huh)
 7186 Mapudungun (arn)
 7188 Highland Totonac (tos)

Otomanguean languages (7200-7399)

7200 Guerrero Amuzgo (amu)
 7210 Copala Triqui (trc)
 7220 Alacatlazala Mixtec (mim)
 7230 Mixtepec Mixtec (mix)
 7240 Silacayoapan Mixtec (mks)
 7250 Mixtec N.E.C.
 7260 Tepeuxila Cuicatec (cux)
 7270 Huautla Mazatec (mau)
 7280 Ixcatec (ixc)
 7290 San Juan Atzingo Popoloca (poe)
 7300 Zapotec (zap)
 7310 Western Tlacolula Valley Zapotec (twb)
 7320 Zoogocho Zapotec (zpq)
 7330 Central Mazahua (maz)
 7340 Mezquital Otomi (ote)
 7350 Ojitlán Chinantec (chj)

7400 Quechua (que)
 7500 Aymara (aym)
 7501 Central Aymara (ayr)
 7505 Galibi Carib (car)
 7515 Wayana (way)
 7525 Waiwai (waw)
 7535 Guahibo (guh)
 7540 Asháninka (cni)
 7550 Arawak (arw)
 7555 Garifuna (cab)
 7560 Taino (tnq)
 7565 Wayuu (guc)
 7575 Wapishana (wap)
 7585 Yucuna (ycn)
 7600 Northern Emberá (emp)
 7635 Boruca (brn)
 7640 Ngäbere (gym)
 7645 Arhuaco (arh)
 7648 Cogui (kog)
 7650 San Blas Kuna (cuk)
 7655 Cofán (con)
 7660 Paumari (pad)
 7665 Mondé (mnd)
 7670 Tupari (tpr)
 7680 Guarani (grn)
 7682 Paraguayan Guaraní (gug)
 7690 Sirionó (srq)
 7700 Xingú Asurini (asn)
 7710 Cocama-Cocamilla (cod)
 7715 Nhengatu (yrl)
 7735 Tehuelche (teh)
 7800 Argentina N.E.C.
 7810 Guatemala N.E.C.

Other and unspecified languages (8000-9999)

8000 Basque (eus)
 8010 Esperanto (epo)
 8020 Shelta (sth)
 8030 Latin (lat)
 8050 American Indian N.E.C.
 8055 Caribbean N.E.C.
 8060 Eastern Europe N.E.C.
 8061 Europe N.E.C.
 8089 Specified not listed
 9999 Unspecified

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FOUR FACTOR ANALYSIS

FOR MAINEDOT LANGUAGE ASSISTANCE PLAN

Purpose and History

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

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

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

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

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

The purpose of this portion of the Maine DOT LEP Plan update is to apply the four factor analysis to the most currently available demographic information in conjunction with survey data conducted in Maine’s eight transportation regions to determine if existing measures put in place as outlined in the 2018 plan are sufficient to bridge gaps to services that may be caused by language barriers, and if not, to provide recommendations to do so.

The importance of the availability of language assistance should be commensurate with the number or proportion of eligible LEP persons, the frequency of contact with the service, and the importance

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

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

The four factors considered in the analysis are:

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

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

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

Safe Harbor Stipulation

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

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary.

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

of other documents, if needed, can be provided orally.

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

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

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

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

TABLE 1 American Community Survey B16001. Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, Maine: 2021				
	Maine			
Geographic Area Name	Number of Speakers	Speak English Very Well	Speak English Less than Very Well	Percentage of the total population 5 and over
Total Population 5 and Over	1,293,114			
Speak only English	1,216,827			
French, Haitian, or Cajun	33,695	27,260	6,435	0.4976
Spanish	11,920	9,208	2,712	0.2097
Chinese (incl. Mandarin, Cantonese)	3,102	1,731	1,371	0.1060
Arabic	1,438	902	536	0.0415
Vietnamese	832	303	529	0.0409
German or other West Germanic languages	4,185	3,695	490	0.0379
Tagalog (incl. Filipino)	1,026	771	255	0.0197
Russian, Polish, or other Slavic languages	2,801	2,297	504	0.0390
Korean	643	451	192	0.0148
Other Asian and Pacific Island languages	3,026	1,876	1,150	0.0889

Other Indo-European languages	6,209	4,647	1,562	0.1208
Other and unspecified languages	7,410	5,005	2,405	0.1860
Total:	1,293,114	58,146	18,141	1.4%

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

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

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

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

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

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

To accommodate LEP citizens who fall into the Other language categories, MaineDOT will translate vital documents in the specific language only upon request. Also, MaineDOT has engaged Acutrans, a licensed and certified language translation company, to identify the top 10 languages spoken in Maine (other than

English) in order to have certified translators at public meetings who can accommodate these LEP speakers. These languages include:

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

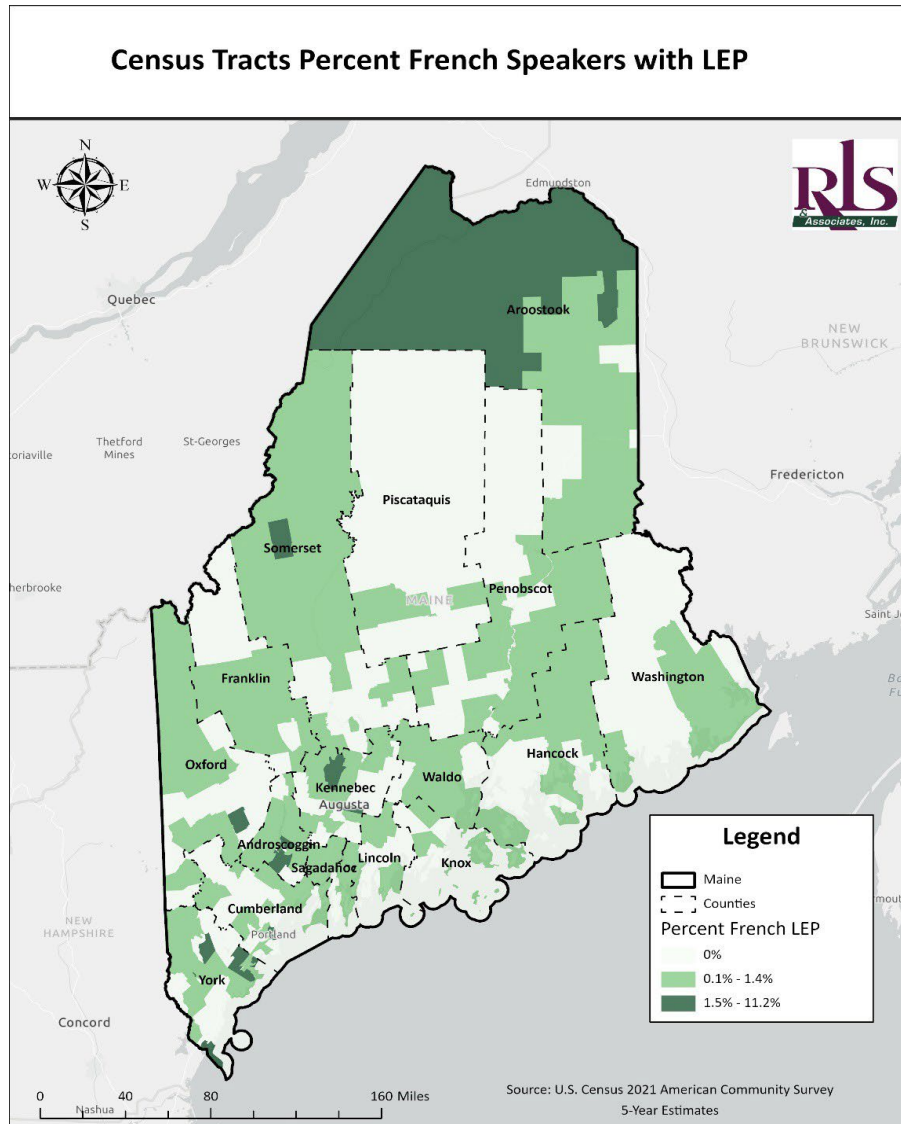
Source:

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

1. French

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

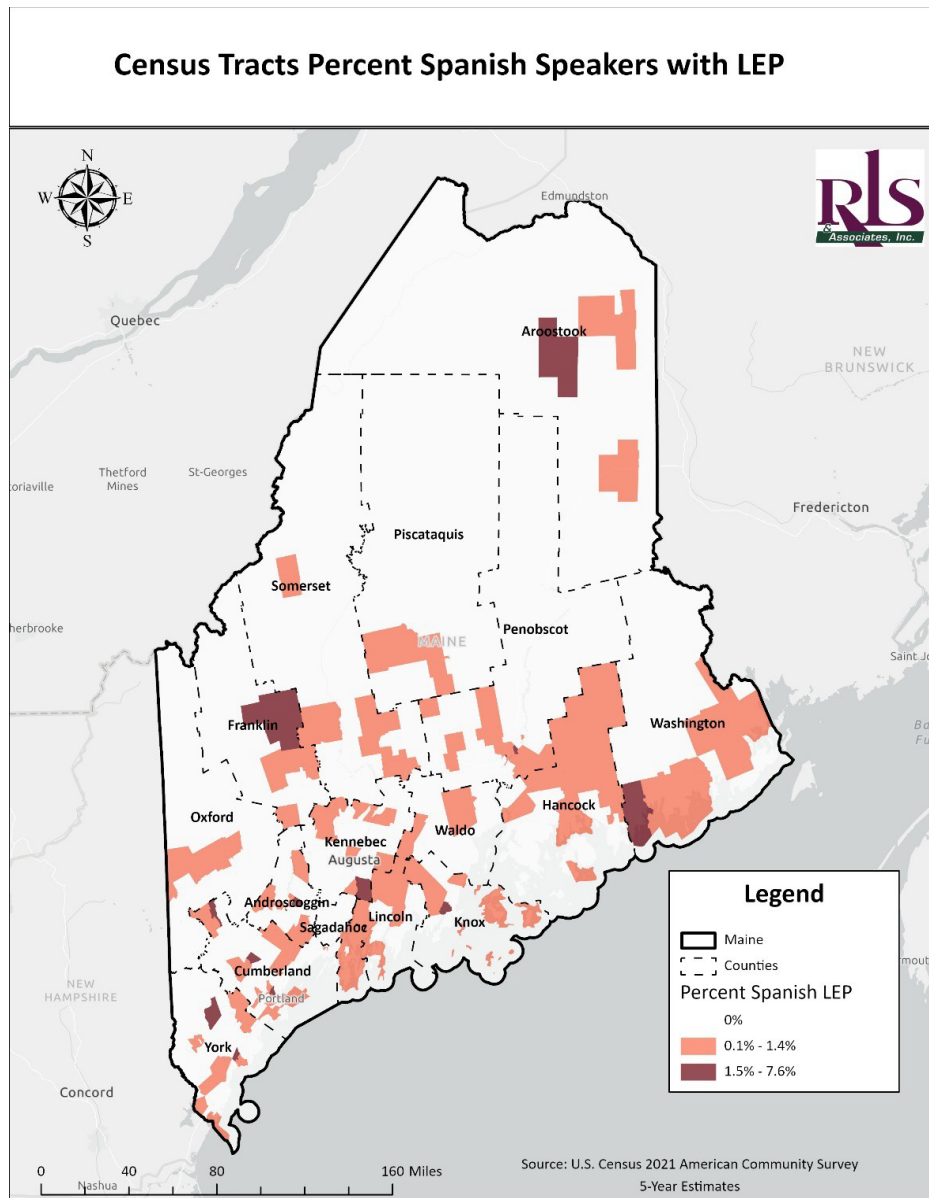
FIGURE 1.



2. Spanish or Spanish Creole

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

FIGURE 2.

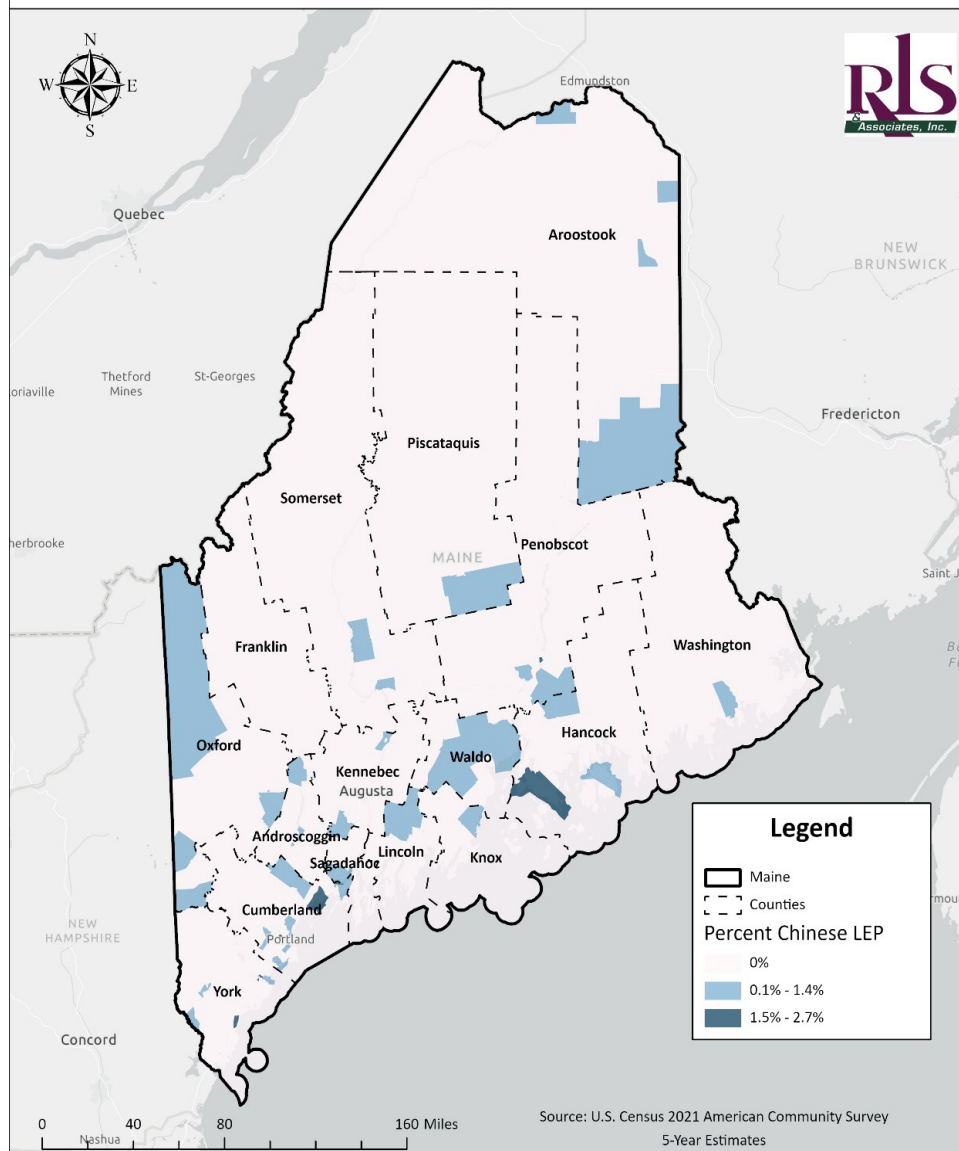


3. Chinese

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

FIGURE 3.

Census Tracts Percent Chinese Speakers with LEP



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

Largely and consistently, identifying LEP populations in Maine's public transit service areas is accomplished through census data, communication with friends and family members who work with LEP populations, communication with community organizations (e.g. Healthy Androscoggin),

professional and medical services, schools, churches, neighborhood gathering spaces, the Maine departments of Transportation, Education, Health and Human Services, and through LogistiCare, a private, for profit manager of non- emergency medical transportation. Penquis, a community action agency serving Penobscot, Piscataquis and Knox counties, also conducts many transportation presentations throughout the year to reach out to all who are interested in transportation.

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

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

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

- MaineDOT will, based on the analysis, make adjustments to its language assistance strategies as needed. For any touchpoints with high LEP interaction, MaineDOT will provide translated materials and interpretation services.
- MaineDOT will continuously refine its language assistance efforts based on feedback and changing demographics in the state of Maine.
- MaineDOT will collaborate with local community organizations that serve LEP populations so that they can provide insight into specific needs and help disseminate translated materials.
- MaineDOT will provide training to its own staff to appropriately respond to LEP interactions and will ensure that its staff are aware of all available language assistance resources. MaineDOT will then provide this training to its subrecipients.

Summary of MaineDOT Survey of Subrecipients for Factor 2:

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

A 12-question survey was distributed to the service providers staff and drivers.¹¹ We received 156 survey responses with representation from all eight transportation regions, including responses from a comprehensive cross section of personnel — executive directors, general managers, operations directors, street supervisors, drivers (medical transportation, fixed route, volunteer, van, bus, trolley, and ferry boat captains), dispatchers, schedulers, mobility managers, transportation supervisors, customer service representatives, greeters, and intake specialists.

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

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

Region 1

Aroostook Regional Transportation Systems, Inc (ARTS) provides demand-response transportation services in Aroostook County, the largest American county by land area east of the Mississippi River with a population density of 11 people per square mile, including 1,799 French-speaking LEP persons. ARTS had a single survey respondent who was not a driver, who indicated that they come into contact with approximately 1–10 LEP individuals in the average week through

¹¹ Two versions of this survey were distributed. In one version, question number six, "How often do you come into contact with riders who speak English less than very well, not well, or not at all?" had multiple choice responses listed in groups of ten from 1–10 up to 91–100 LEP persons per week. In the other version, question six had multiple choice responses listed as, "Often", "Sometimes", "Rarely", and "Never". Through discussions with a sampling of respondents we were able to equate "often, sometimes, rarely, or never" with the numbered groups.

telephone, email and fax communications. As the respondent is not a driver, no conclusion can be made with regard to the location of the highest LEP ridership in Aroostook County.

Region 2

Zero:

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

1–10:

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

11–20:

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

Region 3

Zero:

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

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

1–10:

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

21–30:

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

Region 4

KVCAP had 53 respondents, broken down as follows.

Zero:

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

Undetermined:

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

1–10:

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

11–20:

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

21–30:

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

Region 5

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

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

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

1–10:

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

Region 6**Zero:**

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

1–10:

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

11–20:

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

21–30:

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

31–40:

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

41–50:

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

Region 7**Zero:**

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

1–10:

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

11–20:

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

31–40:

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

Region 8

Zero:

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

1–10:

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

11–20:

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

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

In summary,

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

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

Survey question five asked which routes in your service area have high LEP ridership. As that is a relative question and was open ended, the answers were not as conclusive as we would have hoped. Some respondents named destinations while others named routes. It can be concluded that the routes with the highest LEP ridership in the State of Maine

are those in Region 6 in the greater Portland area, and in Region 7 in Lewiston and Auburn. However, each transportation region has its own routes of importance/high ridership given their relative total and LEP populations.

FACTOR 3: THE IMPORTANCE TO LEP PERSONS OF MAINEDOT PROGRAMS, ACTIVITIES AND SERVICES

Region 1

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

Region 2

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

Region 3

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

Region 4

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

Region 5

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

Region 6

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

Region 7

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

Region 8

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

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

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

FACTOR 4: THE RESOURCES AVAILABLE TO THE RECIPIENT AND COSTS

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

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

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

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

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

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

Region 7 service provider WMT survey respondents indicated that they are moderately to very effective at communicating with LEP individuals. Staff at WMT have family members who are educators who notify them of new LEP populations

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

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

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

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

CONCLUSION

It appears that with a few exceptions, language is not a barrier to services in Maine, and that there are resources available to provide meaningful access to programs and activities if they are needed, including community organizations like Healthy Androscoggin and New Mainers Resource Center; translation services like Pacific

Translators Language Line and Catholic Charities Interpreters; mobile apps; ‘I Speak’ cards; bilingual and multilingual staff; and 711 relay services. Survey respondents indicated that translation methods like mobile apps, ‘I Speak’ cards, and tele-language services would be most helpful in bridging the communication gaps as they arise.

RECOMMENDATION

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

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

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

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

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