

**Aroostook Regional Transportation System, Inc.**  
**Title VI Plan**



**Adopted 8/20/2024**

# **Aroostook Regional Transportation System, Inc. (ARTS) Title VI Plan**

## **Non-Discrimination in the Federal Transit Program**

### **Introduction**

Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. All recipients and subrecipients of Federal Transit Administration (FTA) funds must ensure that programs, policies and activities comply with FTA Title VI regulations. To provide recipients with specific guidance, FTA published Circular 4702.IB, October 2012 ([http://www.fta.dot.gov/legislation\\_law/12349\\_14792.html](http://www.fta.dot.gov/legislation_law/12349_14792.html)). The instruction provided in the circular is intended to ensure recipients meet the Title VI requirements and appropriately integrate them into FTA-funded programs throughout each state.

To meet all Title VI requirements, FTA-Funded programs must submit to the Maine Department of Transportation (MaineDOT) a Title VI plan that exhibits policy adoption, public outreach and involvement procedures and complaint procedures. Pursuant to MaineDOT's Title VI Plan, Subrecipients of FTA dollars through MaineDOT are required to provide a Title VI Plan to MaineDOT by October 1, 2015. Following that submission, Title VI plans will be due every three years on the first of October. Plans will include or reference the following information:

- New signed Title VI Assurances
- A designated Title VI Coordinator responsible for Title VI compliance
- Appendix A & E included in contracts
- Title VI Complaint Process
- Four Factor Analysis
- LEP Plan
- Public Participation Plan

### **Background**

Aroostook Regional Transportation System, Inc. (ARTS) is a 501 (c)(3) nonprofit organization established in 1979.

ARTS is located at 24 Houlton Road in Presque Isle, Maine. ARTS serves approximately 931 passengers each year.

ARTS employs 22 full-time and part-time drivers and 8 full-time office staff.

ARTS provides on demand door-to-door transportation in northern Maine including the general public, older adults, and individuals with disabilities. ARTS also contracts with other organizations to provide transportation services covering over 6,600 square miles in Aroostook County, Penobscot County, and Washington County. ARTS' Title VI plan can be found on the organization's website [aroostooktransportation.org](http://aroostooktransportation.org), and the lobby and breakroom at 24 Houlton Rd. Presque Isle, ME.

## **Title VI Assurances**

ARTS affirms:

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.

ARTS is a public non-profit entity. It is the policy of ARTS to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.

The ARTS Title VI Coordinator is granted the authority to administer and monitor the Title VI Plan as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The Title VI Coordinator will assist as needed.

ARTS will take all steps to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Agency.

The Agency recognizes the need for annual Title VI training for Agency personnel. Signed:

  
Title: Executive Director

  
Date

## **Maine DOT Compliance/Monitoring Review and Training**

ARTS agrees to participate in on-site reviews and cooperate with Compliance Staff throughout the review process. ARTS agrees to participate in training that includes Title VI and its requirements.

## **Certification and Assurance Submission**

ARTS agrees to submit the annual Title VI assurance to MaineDOT as part of the annual Certification and Assurance submission.

## **Designated Title VI Coordinator**

The designated Title VI Coordinator ARTS is Executive Director.

## **Agency Subcontracts**

**ARTS agrees to include in all contracts Appendices A and E of the Maine Department of Transportation FTA Title VI Nondiscrimination Plan**

## Title VI Complaint Procedures

MaineDOT investigates and tracks Title VI complaints filed with MaineDOT against subrecipients.

ARTS has developed procedures for investigating and tracking Title VI complaints filed against it and has made those procedures for filing a complaint available to the public. The ARTS complaint procedure is outlined below:

Any person who believes she or he has been discriminated against based on race, color, or national origin by ARTS may file a Title VI complaint by completing and submitting the Agency's

Title VI Complaint Form (**See Appendix A**). ARTS investigates complaints received no more than 180 calendar days after the alleged incident. ARTS will process complaints that have completed all elements of the complaint form.

Once the complaint is received, ARTS will review it to determine whether or not ARTS has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by ARTS.

ARTS has 10 business days to investigate the complaint. If more information is needed to resolve the case, ARTS may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 calendar days, the investigator can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, ARTS will issue one of two letters to the complainant:

- A closure letter that summarizes the allegations and states there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) that summarizes the allegations and the interviews regarding the alleged incident, and explains if any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 calendar days after the date of the closure letter or the LOF to do so. If an appeal has been submitted, ARTS will forward appeals to the MaineDOT Civil Rights Title VI Coordinator within 10 days.

When a complaint has been directly filed with another state or federal agency, the Agency is to inform the Title VI Coordinator where the complaint has been filed and coordinate any action needed by MaineDOT to resolve the complaint.

A person may also file a complaint directly with the Maine Department of Transportation at:

Maine Department of Transportation  
Attn: Title VI Coordinator  
16 State House Station  
Augusta, Maine 04333

A person may also file a complaint directly with the Federal Transit Administration at:

FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

If a complainant feels ARTS is unresponsive or the complaint was not properly resolved, the complainant may file a complaint with the Federal Transit Administration's (FTA) Office of Civil Rights at:

FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

### **Title VI Informal Complaint Policy**

Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant must be informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by ARTS identified Title VI Coordinator. The coordinator will log the complaint in the required complaint log. If the complaint cannot be resolved informally, ARTS identified Title VI Coordinator must inform the complainant of the formal process outlined above and instruct the complainant on how to proceed.

### **Title VI Log of Complaints/Lawsuits, etc. (See Appendix B)**

ARTS will prepare and maintain a list of any alleged discrimination on the basis of race, color, or national origin, including any active investigations conducted by entities other than FTA, lawsuits, and complaints naming the Agency. The list will include the date that the investigation, lawsuit or complaint was filed; a summary of the allegation(s) and date resolved.

### **Title VI Notice to Beneficiaries**

ARTS will provide information to the public regarding ARTS obligations under FTA's Title VI regulations and apprise members of the public of the protection against discrimination afforded to them by Title VI. At a minimum, ARTS shall disseminate this information to the public by posting the notice on its website and in local media. ARTS will document where and when this information is posted.

ARTS will widely distribute its Title VI plan. The Title VI notifications are also included with all newly printed or revised agency publications, brochures and pamphlets meant for public consumption. The following notice is standard wording for publications, brochures, flyers, etc.:

- ARTS is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and relevant guidance. The Agency assures that no person in the United States shall, on the grounds of race, color or nation 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.
- To request additional information on ARTS Title VI policy, or to file a discrimination complaint, please contact ARTS at 207-764-5246.

- The Complaint Procedure and Form are located on the main page of ARTS' website at <https://aroostooktransportation.org>. A paper version is available at ARTS' administrative office during regular business hours at 24 Houlton Road, Presque Isle, ME 04769.

## **Title VI Poster (See Appendix C)**

ARTS will provide a poster to meet the requirements listed below and will provide updates as required. ARTS Title VI poster is available in the front entrance, in the employee breakroom, and in each of the vehicle maintenance binders of each vehicle. ARTS will also keep a database of the location of all Title VI posters and ensure they are clearly posted in the appropriate public places. Posters will include the following information:

- Description of agency Title VI commitment
- Information for more of Agency's Title VI program and the procedures to file a complaint, contact information, email, and address
- For more information, visit [www.aroostooktransportation.com](http://www.aroostooktransportation.com).
- FTA and MaineDOT Office of Civil Rights, Attention Title VI Program Coordinators, address to file a complaint directly with either the state or federal agency directly
- Additional information if another language is needed at 207-764-5246.

## **Limited English Proficiency (LEP)**

### **Four Factor Analysis**

ARTS is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. By completing the Four Factor Analysis below, ARTS assures that no person 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 FTA service, program, or activity.

- Indicate the number or proportion of LEP persons eligible to be served or likely to be encountered by the program. Based on information contained in the 2023 Demographic profile of the State of Maine, in MaineDOT's FTA Title VI Plan, dated 2024, Maine has a small but growing minority population that is geographically spread across the state. Maine has a relatively low percentage of people who don't speak English very well. There are only six languages/"Other" language categories/clusters in which the number of persons who speak English less than very well exceed the Safe Harbor Threshold of 1,000 persons: French, Haitian, or Cajun, Spanish, Chinese (including Mandarin and Cantonese), other Asian and Pacific languages, Other Indo-European, and Other and unspecified languages.
  - Describe how LEP people interact with the Agency. LEP persons can potentially interact with ARTS when they telephone the agency, when they board or exit a transit vehicle, or when they attend a meeting sponsored by ARTS.
  - According to MaineDOT's 2023 Four Factor Analysis, Aroostook County has an estimated 1,326 French-speaking LEP persons. These communities are predominately in the St. John Valley of Aroostook County.

- Identify whether LEP persons are underserved by the Agency service due to language barriers. ARTS has not received any complaints indicating individuals have been underserved in any way including through interaction with drivers, staff members, the ARTS Board of Directors, public meetings, emails, phone calls including those from outside agencies or organizations, or from the MaineDOT.
- Indicate the frequency with which LEP persons come into contact with the program through the following methods:
  - Buses. ARTS has no confirmation that LEP populations are using their service.
  - Public meetings. At any previous public meeting, ARTS had no conversation barriers.
  - Customer service interactions. There have been no customer service interactions with LEP persons during the past three years.
  - ARTS has not done any surveys during the past three years.
- Describe the service and the nature of importance of the service (narrative) to the LEP population.
  - Participate in the development of the coordinated plan to meet the specific transportation needs of seniors and people with disabilities, especially those with LEP needs. ARTS buses are accessible to persons with disabilities, but ARTS has no data that suggests that seniors and people with disabilities are part of Maine's LEP population.
  - Include special language assistance for public meetings. ARTS has "I Speak" language identification cards available at public meetings. Should the need arise, ARTS can utilize translation services identified in MaineDOT's FTA Title VI Plan. However, during the past three years, there have been no LEP persons requesting the use of these services.
- Indicate the resources available to Agency for LEP outreach, as well as the costs associated with that outreach. ARTS has "I Speak" language identification cards available on its buses and at public meetings. If the need for translation services arises, ARTS can utilize one or more of the translation services identified in MaineDOT's FTA Title VI plan at a cost of approximately \$50 - \$65/hour.

## **Language Assistance Plan**

Following completion of the Four Factor Analysis, ARTS assures that based on the results of the Analysis, a Language Assistance Plan will be created. The ARTS Language Assistance Plan includes the following:

- Results of the Four Factor Analysis, including a description of the LEP Population(s) served. Based on information contained in MaineDOT's FTA Title VI Plan, dated February 2015, Maine has a relatively low percentage of people who don't speak English very well. There are only four languages in which the number of persons who speak English less than very well exceed the 1,000 person/5% threshold: Spanish or Spanish Creole, French, Chinese and African languages. In Aroostook County, there are 1,326 French-speaking LEP persons.

- A description of how ARTS provides language assistance services by language. ARTS has "I Speak" language identification cards available at public meetings. Should the need arise, ARTS can utilize translation services identified in MaineDOT's FTA Title VI Plan.
  - Vital written documents include Title VI Complaint Form, Notice to Beneficiaries, and other documents that provide access to services. Within the past three years, there have been no requests by LEP persons to have these documents provided in another language.
- A description of how ARTS provides notice to LEP persons about the availability of language assistance. ARTS has "I Speak" language identification cards available on its buses and at public meetings. ARTS also posts Title VI posters in its offices and at other prominent places.
- A description of how ARTS monitors, evaluates and updates the language assistance plan. On a yearly basis, ARTS Title VI Coordinator will review the Title VI plan in conjunction with Census data, FTA requirements, and any developments that would impact the plan including: complaints and requests for language assistance services. Based on this review, ARTS' Language Assistance Plan will be updated accordingly.
- A description of how ARTS trains employees to provide timely and reasonable assistance. ARTS will participate in LEP training sessions provided by MaineDOT at Maine Transit Association meetings and will also review on an annual basis MaineDOT's training document titled "How to Work with a Telephone Interpreter" and any other Title VI documents on MaineDOT's website.

#### **Staff Ongoing Title VI Training Process/Description**

All ARTS staff and volunteers will be trained on Title VI. Training will include the following documents:

- Non-discrimination poster
- Title VI complaint form
- Complaint log
- LEP (Four Factor Analysis and Language Assistance Plan)
- Title VI brochure

ARTS will utilize MaineDOT staff to assist with trainings. Affidavits will be signed when training is completed and filed as part of the Title VI program documentation.

#### **Public Participation Plan**

ARTS will work with MaineDOT staff to identify targeted minorities within the service area. MaineDOT staff will supply demographic information to the lowest census level possible within the region to identify specifically what minority populations exist within the ARTS service area. ARTS will identify the appropriate locations to disseminate information to the identified populations (e.g., church, neighborhood gathering space) to seek comment, interest in new service or service revisions and/or extensions. ARTS will document and maintain on file all activities related to Title VI outreach. This plan and documentation will be made available at MaineDOT's request.

ARTS will coordinate with regional planning efforts include outreach to targeted populations within the ARTS service area.



ARTS will provide a summary to MaineDOT of all outreach efforts upon request and prior to future plan submittals and review.

ARTS recognizes that future funding for new or revised service requires documentation of the above efforts.

Aroostook Regional Transportation System, Inc.  
**Appendix A Complaint Form**

**External Discrimination Complaint Form**

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

Name	Phone	Name of Person(s) That Discriminated Against You
Address		Location and Position of Person (If known)
City, State, Zip		City, State, Zip
Agency involved		Date of Alleged Incident
Discrimination Because of: <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input checked="" type="checkbox"/> National Origin <input checked="" type="checkbox"/> Sex <input type="checkbox"/> Age <input checked="" type="checkbox"/> Disability		What Remedy are you requesting?
Explain As Briefly And Clearly As Possible What Happened And How You Were Discriminated Against. Indicate Who Was Involved. Be Sure To Include How Other Persons Were Treated Differently Than You. Also Attach Any Written Material Pertaining To Your Case.		
Signature		Date

**Please Mail Complaint to:**

Aroostook Regional Transportation System, Inc.  
Attention: Executive Director or Human Resources Manager  
PO Box 552, 24 Houlton Road  
Presque Isle, ME 04769

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Aroostook Regional Transportation System Inc.  
Appendix B Log Form

Type	Date (day(s), month(s), year(s))	Summary (basis – race, color, or national origin)	Status	Action(s) taken
Complaints and Investigations against the subrecipient or its employees	NONE			
Lawsuits	NONE			



## FTA Title VI Notice

### **AROOSTOOK REGIONAL TRANSPORTATION SYSTEM, INC.**

- Aroostook Regional Transportation System, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Aroostook Regional Transportation System, Inc.
- For more information on the Aroostook Regional Transportation System, Inc.'s civil rights program, and the procedures to file a complaint, contact (207) 764-5246, email [executivedirector@artsme.org](mailto:executivedirector@artsme.org), mail complaint to Executive Director PO. Box 552 Presque Isle, ME 04769, or visit our administrative office at 24 Houlton Road in Presque Isle, ME 04769. For more information, visit [www.arostooktransportation.org](http://www.arostooktransportation.org).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, D.C. 20590.
- Language translation services available upon request.
  - Services de traduction langue disponibles sur demande.
  - Servicios de traduccion disponibles bajo peticion.
  - Lugha ya tafsiri huduma inapatikana juu ya ombi.
  - Ladenan panarjamahan Basa aya kana pamenta.