



Title VI Program

April 2025

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Sec. 1.0 INTRODUCTION

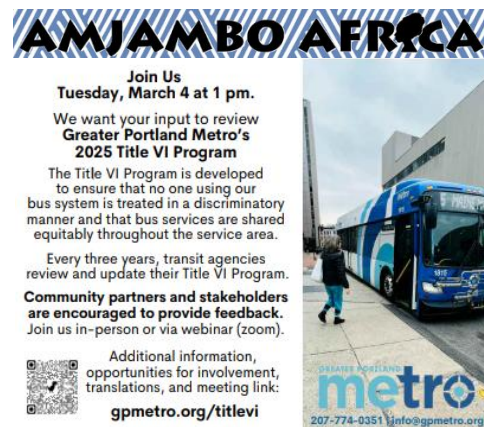
This Greater Portland Transit District's (Metro) Title VI Program has been updated to ensure that the level and quality of Metro's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Metro's riders and other community members. Additionally, through this program, Metro has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

Metro is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of Metro's services on the basis of race, color, or national origin. The contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) and of the U.S. Department of Transportation (USDOT), Metro has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in the service area;
- No one is precluded from participating in Metro's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color, or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and A program is in place for correcting any discrimination, whether intentional or unintentional.

Metro has sought to engage the public in the development and update of this program. Metro engaged community organizations, riders, and staff to provide input. Metro's Board of Directors and Committees were involved in the update of this program. On **February 12, 2025**, the Board's Executive Committee reviewed the steps required to update the Title VI Program. On **March 4, 2025**, a public meeting was held to review updates of the program; public participation was encouraged via social media posts and an advertisement in Amjambo Africa. The Marketing and Communications Committee reviewed the final draft at their **March 12, 2025** meeting. The proposed program was reviewed and approved by the Metro Board of Directors on **March 27, 2025**.



AMJAMBO AFRICA

Join Us
Tuesday, March 4 at 1 pm.

We want your input to review
**Greater Portland Metro's
2025 Title VI Program**

The Title VI Program is developed to ensure that no one using our bus system is treated in a discriminatory manner and that bus services are shared equitably throughout the service area.

Every three years, transit agencies review and update their Title VI Program.

Community partners and stakeholders are encouraged to provide feedback. Join us in-person or via webinar (zoom).

Additional information, opportunities for involvement, translations, and meeting link:
gpmetro.org/titlevi

207-774-0351 info@gpmetro.org

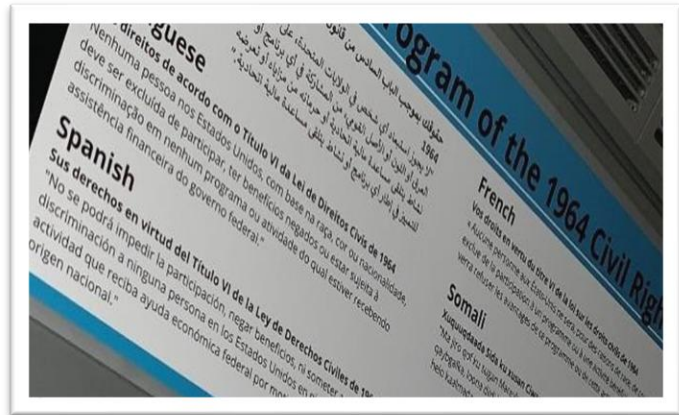
Public meeting notices for major service changes and other major topics, like Title VI updates, are advertised in numerous places to target LEP persons, including translated publications like Amjambo Africa.

This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty (50) vehicles in peak service. It supersedes Metro's Title VI Program of 2022 and is effective **as of April 2025**. It has been prepared using data from **the** American Community Survey 5-year Estimate, the most recent such data available at the time of this document's adoption. 2

Sec. 2.0 GENERAL REQUIREMENTS

2.1 Notice to the Public:

To make Metro’s riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, Metro has presented the following language on its website (gpmetro.org), on posters at the Congress/Elm Transit Center, **South Portland Transit Hub**, and in buses, and in brochures.



Title VI translations, in five languages, are posted on all Metro buses and at transit hubs.

2.2

TITLE VI Program of the 1964 Civil Rights Act	
<p>Arabic حقوقك بموجب الباب السادس من قانون الحقوق المدنية لعام 1964 "لا يجوز استبعاد أي شخص في الولايات المتحدة، على أساس العرق أو اللون أو الأصل القومي، من المشاركة في أي برنامج أو نشاط يتلقى مساعدة مالية اتحادية أو حرمانه من مزاياها أو تعرضه للتمييز في إطار أي برنامج أو نشاط يتلقى مساعدة مالية اتحادية."</p>	<p>French Vos droits en vertu du titre VI de la loi sur les droits civils de 1964 « Aucune personne aux États-Unis ne sera, pour des raisons de race, de couleur ou d'origine nationale, exclue de la participation à un programme ou à une activité bénéficiant d'une aide financière fédérale, ne sera refusé les avantages de ce programme ou de cette activité, ni ne sera soumise à une discrimination ».</p>
<p>Portuguese Seus direitos de acordo com o Título VI da Lei de Direitos Cívicos de 1964 "Nenhuma pessoa nos Estados Unidos, com base na raça, cor ou nacionalidade, deve ser excluída de participar, ter benefícios negados ou estar sujeita à discriminação em nenhum programa ou atividade do qual estiver recebendo assistência financeira do governo federal."</p>	<p>Somali Xuquuqdaada Sida ku xusan Ciwaanka VI ee Xeerka Xuquuqda Madaniga ee 1964 "Ma jiro qof ku sugan Mareykanka, iyadoo loo eegayo isir, midab, ama asal qaran, oo laga saari karo ka qaybgalka, loona diidi karo faa'iidooyinka, ama laga takoori karo barnaamij kasta ama hawl kasta oo lagu helo kaalmada maaliyadeed ee Federaalka."</p>
<p>Spanish Sus derechos en virtud del Título VI de la Ley de Derechos Civiles de 1964 "No se podrá impedir la participación, negar beneficios, ni someter a discriminación a ninguna persona en los Estados Unidos en ningún programa o actividad que reciba ayuda económica federal por motivos de raza, color u origen nacional."</p>	<p>English Your Rights Under Title VI of the Civil Rights Act of 1964 "No person in the United States, shall, on the grounds of race, color or national origin, be excluded for participation in, be denied the benefits of, or be subjected to discrimination on any program or activity receiving federal financial assistance."</p>

Procedures for Filing a Complaint:

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964. Members of the public who believe they have been the subject of discrimination can file a written and signed complaint up to 180 days from the date of the alleged discrimination. To find out more about Metro’s nondiscrimination procedures or to file a complaint, look for information online at gpmetro.org or call (207) 774-0351.

Any individual, group of individuals, or entity that believes it has been subjected to discrimination prohibited under Title VI may file a complaint by completing the Metro complaint form and forwarding it to:

Greater Portland Transit District
Attn: Executive Director
114 Valley Street
Portland, ME 04102

Metro has developed a **Title VI Complaint Form (Attachment A)** that asks for the following information:

- Individual contact information.

- Date and location of incident.
- Detailed description of incident, the basis for alleging that discrimination has occurred, and identification of all involved parties.
- Identification of any witnesses to the incident.

Title VI complaints must be signed and dated. Members of the public can access complaint forms and instructions at Metro’s Congress/Elm Transit Center, main office located at 114 Valley Street, Portland ME 04102, and on the website (gpmetro.org). Hard copy forms and instructions can be mailed upon request.

In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Transit Operations Manager. Under these circumstances, the complainant will be interviewed, and the Transit Operations Manager will assist the complainant in converting the verbal allegations to writing.

2.2 Procedures for Processing a Complaint

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (1994), and Executive Order 13166 “Improving Access to Services to Persons with Limited English Proficiency” (2000), for alleged discrimination in a program or activity administered by Metro.

The following measures will be taken to resolve Title VI complaints.

COMPLAINT HANDLING PROCEDURES

Within two (2) business days, the Transit Operations Manager will notify the customer that he/she received the complaint and will conduct an investigation. Within the same timeframe, the EEO Officer will be immediately notified of any complaints identified as, or initially believed to be, Title VI.

- a. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered cause for a determination of no investigative merit.
1. FOR GENERAL COMPLAINTS - within ten (10) business days from receipt of a complete complaint, the Transit Operations Manager will complete a written report outlining the investigation’s conclusions and what, if any, resolutions will be implemented.
2. TITLE VI COMPLAINTS – within two (2) business days from receipt of a complete complaint, the Transit Operations Manager (or designee in the case of absence) will report the complaint to the EEO Officer who will determine whether the complaint has sufficient merit to warrant additional investigation as an ADA or Title VI complaint. Within three (3) business days from this decision point, the EEO Officer (or designee) will notify the Complainant whether or not a formal Title VI investigation will be pursued.

If the complaint is deemed to have investigative merit: A complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, a finding with recommendations for remedial steps as appropriate and necessary. The remedial steps, if any, will be implemented as soon as practicable. The Complainant will receive a copy of the final report together with any remedial steps.

If the decision is not to investigate as a Title VI complaint: the notification shall specifically state the reason

for the decision.

- a. The complainant may appeal the EEO Officer's decision by making a written request to the Executive Director within thirty (30) days of receiving the EEO Officer's decision.
- b. Upon receiving an appeal, the Executive Director will evaluate the appeals request, the original complaint, the facts of the case including the investigation process, conclusions and outcomes. The Executive Director's primary evaluation criteria will include: proper application of Title VI law and regulations, consistent and equitable investigation process, sound judgment and considerations of operational practicality.
- c. The Executive Director will respond to the appeal within ten (10) business days.
- d. Complaints may also be filed with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination. Complaints to FTA may be submitted to the following office:
 - e. Federal Transit Administration Office of Civil Rights
55 Broadway, 9th Floor Cambridge, MA 02142

The EEO Officer will retain all pertinent records of ADA and Title VI complaints for five (5) years. Using MS Excel, MS Access, or other appropriate database tool, the EEO Officer will maintain a summary log of all complaints received for one (1) year. The log shall include the date the complaint was filed, the type of complaint (i.e., General, ADA, Title VI), a summary of the allegations, the status of the complaint, and actions taken by Metro in response to the complaint.

See **Attachment B: Policies and Procedures for General, ADA, and Title VI Complaints**

See **Attachment C: Metro's TITLE VI – Log of Complaints and Investigations (2022--2025).**

Sec. 3.0 METRO'S PUBLIC PARTICIPATION PLAN

Metro's Public Participation Plan has been prepared to ensure that no one is precluded from participating in Metro's service planning and development process.

3.1 Metro Public Involvement Efforts

Metro uses a variety of proactive methods to gather broad-based public input on its services, standards, and projects.

- **Board of Directors and Board Committee Meetings** – these meetings are open to the public and the meeting location is accessible by transit as well as ADA accessible. Meetings are held in a hybrid format, both in person and at Metro's offices and via webinar. The link to meetings is made available to the public on the website and on the agenda. Every agenda includes a separate item for public comment. Agendas are posted on the website, office, and at Metro's transit center. All supporting materials are posted on Metro's website, along with the agenda. The Board and its committees meet monthly. The meeting dates for the Board and its **five** committees are listed on Metro's website (gpmetro.org) and posted at the Metro Pulse at Elm Street, Metro's downtown transportation hub at 21 Elm St. in Portland, allowing the public ample notice for meeting dates.

Until January 2025, Metro had three committees that met on a monthly basis -- Executive, Ridership, and Finance. With the addition of two communities in 2024, the expanded board made the decision increase the number to five committees to better focus on specific aspects of agency priorities. The five committees are: Executive, Advocacy, Finance, Marketing and Communications, and Planning and Operations. The Board of Directors will meet quarterly and the Committees will meet monthly.

A change to the by-laws designates the Executive Committee to vote on action items in months when the full Board of Director's does not meet. The Executive Director and staff, as directed by the Executive Director, are available at most meetings. Guests in attendance are asked for their contact information. Members of the general public are invited to speak at the meetings. Metro provides translation and interpreter services, including American Sign Language, upon request.

- **Targeted Community Workshops** – for service improvements and expansions, Metro holds more focused community workshops. The most recent examples of these were held in member communities in 2023 to present service recommendations from the Transit Together Project, a study conducted by a research group to improve regional transit options. Included in the project were recommendations for service improvements, including developing a micro transit pilot for Falmouth, which was then launched in December 2024. Metro signage includes translations in five languages to identify a service change and a QR code to scan and find out more information on the Metro website, with Google Translate options.
- **Task Forces and Advisory Committees** – Metro facilitates the assembly of task forces for specific initiatives. When task forces are formed, tactics are used to reach LEP persons, such as videos and meetings with interpreters and translated surveys.
- **Online Comment Form** – Metro manages an online comment form on its website to allow members of the public to submit questions, comments, and complaints. Forms can be found at gpmetro.org/contact-us.
- **Email** – Metro's general email address is info@gpmetro.org for requests, comments, and suggestions.
- **Metropolitan Planning Organization (MPO) Process** – The MPO formally notices and conducts surveys and public hearings on behalf of Metro and other regional transportation providers for the purpose of the gathering public comments on the regional program of projects and updates to the Transportation Improvement Program (TIP). They also provide resources as needed to support LEP persons, including the Bus Ambassador Program and others services.
- **Local City/Town Council Meetings** – Each year, Greater Portland Metro's member communities – Brunswick, Falmouth, Portland, and Westbrook, and as of 2024 Gorham and South Portland, consider their local contributions as part of their annual budget processes. Metro staff often provides presentations on budget, services, and current/proposed projects at these budget meetings, which are open to the public.

Transit Together Public Meetings

Join METRO Staff for public meetings in Portland, Westbrook, or virtually, via Zoom, for presentations on proposed route and schedule changes that could start this year.

These recommendations are part of the Transit Together Plan, to improve the transit network and make it more seamless across the region.

Meetings to inform and receive comments

<p>Tuesday, May 9 from 3:30 - 5:30 PM Westbrook Community Center, Room (Spruce Room) Take METRO Route 3 (Transfer from 4 & HL on Main St.)</p> <p>Wednesday, May 17 from 3:30 to 5:30 PM Portland Public Library, 5 Monument Square, Meeting Room 5 (downstairs) Take METRO Routes, 1, 2, 4, 5, 7, 8, 9, HL, BREEZ</p> <p>Thursday, May 18, beginning at 6 PM Virtual Meeting via Zoom</p> <p>Information, survey, and (Zoom) meeting link at: gpmetro.org/TransitTogether</p>	<p>Bus Service Changes تغييرات خدمة الحافلات Modifications du service d'autobus Modificaciones no servicio de autobuses Cambios en el servicio de autobuses Aadeegga baska ayyaa isbeddelay Translation/Interpretation available upon request at info@gpmetro.org</p> <p>GREATER PORTLAND metro TOGETHER WE RIDE gpmetro.org 207-774-0251</p>
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Community workshops are held to gather feedback on service recommendations. Notice of meetings are posted at transit hubs, online, on buses, and advertised (including a publication serving minority communities)

3.2 Public Comment for Fare Increases and Major Service Reductions

Metro holds issue-specific public meetings whenever the agency is considering one or more of the following changes:

- A fare increase or significant change in the method of fare payment.
- A new route is being established.
- An existing route is proposed for elimination.
- Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered.
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours.
- Proposed modifications to routes or groups of routes that would affect more than 25% of the riders using the affected routes.
- Proposed schedule changes on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.

For schedule and service changes not rising to the level of those above, Metro's approval process will take the following form (except for minor changes):

Step 1 - Internal staff review based on documented need, professional judgment, public request.

Step 2 - Preliminary review of proposed changes by one or more committees of the Board of Directors.

Step 3 - Preliminary review by Executive Committee or full Board of Directors.

Step 4 – Public input process commences when appropriate, using public meetings and other approaches to gather broad-based feedback that may include surveys, presentations to stakeholder groups and organizations, and public presentations to city/town councils or other public bodies (e.g., planning boards, and council committees).

Step 5 - Public input along with final recommendations communicated to the Metro Board of Directors.

Metro's Public Participation Plan is outlined in **Attachment D – Policy and Procedures for Soliciting and Considering Public Comment on Fare Increases and Major Service Reductions**.

Per this policy, meetings are held in communities along Metro service routes and/or virtually. Meetings are always held at a location that is transit and ADA accessible. Metro board and committee meetings are also open to the meeting for public comment. Information on how to attend in-person and remote meetings is provided on the Metro website and included on signage posted at Metro's downtown transportation hub (21 Elm St. in Portland).

Alerting the public to these meetings includes many of the following outreach tactics:

- Formal notice in one or more local newspaper(s)
- Signage at our transit hub and on buses.
- Facebook posts and other social media outlets.

- Notices on Metro’s website and websites of member communities, when appropriate.
- Newsletter distribution and e-mail blasts to numerous community organizations, stakeholders, and residents who have asked to be on Metro’s e-mail distribution list, including subscribers to Metro’s website new alerts.

3.3 Public Transit-Human Services Transportation

Metro participates in the local public transit-human services transportation coordinated planning effort. To be eligible for Section 5310, 5316, or 5317 funds administered by the State, projects must be in the local plan. Through our participation in the planning efforts, we regularly meet with representatives of human service agencies to discuss the transportation needs of elderly persons, persons with disabilities, low income, and LEP persons to ensure our current or planned services meet the needs of these individuals.

In addition, Metro participates in Greater Portland Council of Governments (GPCOG) outreach activities, such as the Bus Ambassador Program, Transit Together, and Community Transportation Leaders, that support outreach efforts to low income, LEP, and senior populations.

3.4 Transportation Improvement Program (TIP) Public Involvement Process

The public involvement process for the Transportation Improvement Program (TIP) provides the public another opportunity to participate in Metro’s transportation planning efforts. This effort is led by the Portland Area Comprehensive Transportation System (PACTS) and Metropolitan Planning Organization (MPO). PACTS has a written public involvement plan and an approved Title VI Plan.

Strategies used by PACTS to inform and involve the public in transportation planning efforts include:

- Website, news releases to local media, and public notices distributed to interested parties by email;
- Workshops and forums; Public opinion surveys;
- Presentations to civic and professional groups;
- Outreach to stakeholder organizations; and
- Convening the Transportation & Community Well-Being Network

From 2017-2024, GPCOG and PACTS hosted a Transportation & Community Well-Being Network, which met monthly, bringing together key stakeholders to share information and work together on improving transportation access and options for people who experience barriers. The network included representatives from human services, health care, transportation, aging, disability, and representatives from populations that frequently experience transportation barriers. The Network provided a venue for coordination and information sharing and included representatives from regional transit agencies, including Greater Portland Metro staff, and stakeholders from non-profit services and organizations, including those that support LEP persons.

SEC. 4.0 LANGUAGE ASSISTANCE PLAN

4.1 Four-Factor Analysis

In order to ensure meaningful access to programs and activities, Metro conducted the four-factor analysis and, based on the results of the analysis, developed a language assistance plan to aid efforts in reaching persons with **Limited English Proficiency** (LEP).

Metro analyzed the following four factors:

- The number and proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which LEP individuals come into contact with Metro services and programs;
- The nature and importance of the program, activity, or service provided by our program;
- The resources available to the recipient and costs.

Factor 1: Number and Proportion of LEP Persons Served or Encountered

The first step in determining components of an LEP Plan is understanding the proportion of LEP persons who may encounter and use Metro’s services, their literacy skills in English and their native language, and the location of their communities and neighborhoods.

LEP Persons, or people over the age of 5 years old who speak English “less than very well”, make up 3.2% of the total population in communities served by Metro (over the age of 5) as shown in Table 1.

Table 1 - Ability to Speak English in communities served by Metro

Ability to speak English	Count	Percent
Very well	192,862	96.8%
Less than very well	6,291	3.2%
Total	199,153	100%

Source: 2023 ACS-5-year estimates Table C16001, summation of Brunswick, Falmouth, Freeport, Gorham, Portland, Scarborough, South Portland, Westbrook, and Yarmouth

Table 2a shows the total number and overall percentage of people speaking languages other than English in Metro’s service area. About 10% of people over the age of 5 speak a language other than English, with the most prominent language group being “Other Indo-European Languages (3.0%).

Table 2b shows the total number and overall percentage of people with LEP in each member community. At 4.9%, the City of South Portland has the highest percentage of people with LEP in the Metro service area, followed by South Portland at 4.8%.

Source: 2018-2023 American Community Survey 5-yr Estimate/ DP02 Selected Social Characteristics in the United States

Table 2: Top Population Groups with Highest Proportions of Individuals over 5 years of Age.

Table 2a: Languages Spoken at Home Other Than English											
	Total Population (over age 5)	Pop. Speaking Language other than English		Spanish		Other Indo-European languages		Asian and Pacific Islander languages		Other languages	
		Count	%	Count	%	Count	%	Count	%	Count	%
Brunswick	20,733	1,537	7.4%	426	2.1%	576	2.8%	466	2.2%	69	0.3%
Falmouth	11,910	749	6.3%	175	1.5%	308	2.6%	103	0.9%	163	1.4%
Freeport	8,045	507	6.3%	51	0.6%	269	3.3%	184	2.3%	3	0.0%
Gorham	17,563	1,021	5.8%	99	0.6%	582	3.3%	253	1.4%	87	0.5%
Portland	65,453	8,044	12.3%	998	1.5%	1,513	2.3%	1,136	1.7%	1,982	3.0%
Scarborough	22,099	1,209	5.5%	288	1.3%	746	3.4%	164	0.7%	11	0.0%
South Portland	25,481	2,877	11.3%	342	1.3%	1,060	4.2%	449	1.8%	1,026	4.0%
Westbrook	19,306	2,117	11.0%	212	1.1%	831	4.3%	338	1.8%	736	3.8%
Yarmouth	8,563	247	2.9%	95	1.1%	119	1.4%	18	0.2%	15	0.2%
Service Area	177,054	17,099	9.7%	2,398	1.4%	5,258	3.0%	2,947	1.7%	4,081	2.3%

	Total Population (over age 5)	Pop. Speaking Language other than English		Spanish		Other Indo-European languages		Asian and Pacific Islander languages		Other languages	
				Count	%	Count	%	Count	%	Count	%
Brunswick	20,733	367	1.8%	32	0.2%	170	0.8%	163	0.8%	2	0.0%
Falmouth	11,910	122	1.0%	0	0.0%	57	0.5%	26	0.2%	39	0.3%
Freeport	8,045	166	2.1%	0	0.0%	13	0.2%	150	1.9%	3	0.0%
Gorham	17,653	214	1.2%	27	0.2%	56	0.3%	113	0.6%	18	0.1%
Portland	65,453	3,149	4.8%	229	0.3%	1,513	2.3%	434	0.7%	973	1.5%
Scarborough	22,099	194	0.9%	84	0.4%	74	0.3%	36	0.2%	0	0.0%
South Portland	25,481	1,260	4.9%	91	0.4%	408	1.6%	230	0.9%	531	2.1%
Westbrook	19,306	751	3.9%	11	0.1%	262	1.4%	44	0.2%	434	2.2%
Yarmouth	8,563	68	0.8%	35	0.4%	15	0.2%	17	0.2%	1	0.0%
Service Area	177,054	6,097	3.4%	425	0.2%	2,494	1.4%	1,177	0.7%	2,001	1.1%

Source: 2023 ACS-5-year estimates Table DP02 Selected Social Characteristic in the United States

Table 3, below, lists languages spoken at the Portland Public Schools, indicating that the top languages, other than English, within the Portland Public School System are Portuguese, Somali, Spanish, Arabic, and French. Each of these languages are spoken by over 250 students. The chart also lists the other top 10 ‘other languages’ spoken at Portland Public Schools. The full list, which further breaks down the list of languages, includes 66 world languages spoken by 2,572 students, which is 38.1% of the student population.

Table 3. Top 10 Non-English Languages Spoken at Portland Public Schools, October 2024

#	Language	Total Number of Students
1	Portuguese	793
2	Spanish	461
3	Somali	301
4	Arabic	277
5	French	265
6	Lingala	186
7	Vietnamese	61
8	Kinyarwanda	55
9	Khmer	51
10	Persian	31

Source: Portland Public Schools Multilingual & Multicultural Center, October 2024

The Portland Public School (PPS) system has the highest number of students in the state that speak languages other than English. This data can be used as a proxy to estimate specific languages summarized in the ACS as “other Indo-European Languages”, “Asian and Pacific Islander Languages”, and “Other languages.”

Community Partner Survey:

To assist in breaking down the language categories, Metro staff asked community partners to assess the extent to which they come into contact with LEP populations. Additional information was received from Portland Public Schools and Catholic Charities (RIS Service).

Community Organizations in Service Area:

- **Portland Public Schools:**

Currently, the district has over 2,300 students who come from homes where over 60 different

languages are spoken. These students represent about 34% of Portland Public Schools’ total enrollment. Over 1,400 of these students are identified as English Language Learners. As shown in Table 3, as of **October 2024**, the top ten languages, other than English, spoken by students and their families in PPS pre-kindergarten through Grade 12 are: Portuguese, Somali, Spanish, Arabic, French, Lingala, Vietnamese, Khmer, Kinyarwanda, and Persian. The relatively large number of Portuguese, Somali, Spanish, Arabic, and French speakers in Portland Public Schools indicates that these languages may be close to, or exceed, the “Safe Harbor” threshold of 1,000 speakers in Metro’s service area, justifying Metro’s translation of these languages. Lingala and Kinyarwanda are not translated because these are French speakers in general.

● **Catholic Charities Maine:**

Catholic Charities is a large organization with many programs serving all Mainers. They run the Maine and Immigration Services (RIS), Maine’s only refugee resettlement program. RIS offers a range of services to refugees. RIS also helps asylees (asylum seekers who have been granted asylum) once they have received their documents). Catholic Charities Maine Refugee and Immigration Services (RIS) is dedicated to helping seeking a new life in America become independent, productive members of our community. Metro staff information on how to ride the bus during RIS orientations.



Metro staff conducts learn-to-ride events with LEP persons at a community event.

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Factor 2 – Frequency of LEP Use/Contact with Service

Metro

There are a number of places where Metro riders and members of the LEP population can come into contact with Metro services, including riding the bus, calls to and direct contact with customer service representatives, the Metro website – gpmetro.org – and outreach materials, and orientation events.

Major points of contact include:

- Using bus service (on board signage, announcements, and driver language skills);
- Communication with customer service staff (phone, email, website, in-person);
- Printed and online material:
- Website and Social Media;
- Local news media including print and radio;
- Public meetings and orientation events.

Employee Survey (Conducted in February 2025)

To better understand the frequency with which LEP riders come into contact with Metro services, Metro surveyed its staff, including bus operators and customer service staff. The survey asked what language skills already exist among employees and the number and nature of encounters with riders or other community members where language is a barrier.

The first question asked employees if they can communicate in a language other than English, and, if so, what language or languages. Of the **52 of 128 employees** who responded to the survey, a very small percentage of the employees participating could speak one or more languages other than English.

Table 4: Staff Language Abilities

Language	Ability: Fluent (# of employees)	Ability: Limited (# of employees)
ASL	1	
Arabic	2	
French	6	1
Lingala	3	
Portuguese	2	
Russian	1	
Somali	0	
Spanish	3	1

The second question asked employees what languages they encountered and the frequency.

Table 5: Languages Encountered by Metro Staff

Language	Daily	Weekly	Monthly	Less than Monthly	Not Specified
African (unspecified)	3				
Arabic	2				
ASL					x
Burundi					x
Creole					x
French	6	2			
Italian					x
Kinyarwanda					x
Lingala	4				
Portuguese	5	1			
Russian / Eastern European		1			
Somalian					x
Spanish	4	1			
Swahili					x
Unknown					x

Typical questions and inquiries from LEP persons.

- Am I on the right bus? How do I get to my destination?
- Understanding time schedules
- Where are stops located?
- Directions for specific locations / addresses along bus routes
- Directions and routes
- Fare collection – various questions around types of tickets, reduced fare, etc.
- Request for more signage in multiple languages
- Questions about reduced fare eligibility
- Employment applications

Factor 3 – The Importance of LEP Services to People’s Lives

The transit service provided by Metro is a critical public service that many members of the community use and rely on. Many depend on Metro services – and associated complementary ADA paratransit service – for access to jobs, education, shopping, and healthcare. Metro provides access to seniors, low-income riders, commuters, and students. Metro has developed several programs with schools, colleges, businesses, and organizations to provide easy and accessible transportation.

Greater Portland Metro provides training to new employees, specifically bus operators, on the importance of Title VI. Annual training for all staff includes a refresher on the Title VI Program. When possible members of the LEP community take part in the bus operator training.

Those programs include partnerships with the following:

- **University of Southern Maine (USM).** Metro expanded transit service between USM campuses and introduced a new U-Pass program for students, staff, and faculty to use the transit system. In September 2024, over 10% of Metro ridership was associated with USM. These trends vary based on the school calendar, but nonetheless, Metro's partnership with USM is a strong ridership generator, particularly on the Husky Line.
- **Southern Maine Community College (SMCC).** Metro and SMCC have partnered for several years, providing free transportation to students.
- Metro has developed relationships with more than 75 businesses, organizations, stakeholders, and non-profits.
- Metro partnered with **Portland Public Schools** in 2015 and continues to work with the school system to provide transportation for all high school students. Metro estimates that approximately 750 students use Metro services per weekday. Using LEP percentages, that would approximate to 286 LEP students. Future plans may include the expansion of this program for younger students.

When limited English proficiency is a barrier to using Metro, this can be a barrier to employment, education, healthcare, and other life necessities. Critical information from Metro which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information on using the transit system
- Service Changes and announcements
- Complaints and Comment forms
- Announcements related to public meetings
- Information about ADA complementary service
- Emergency communications

Metro continues to update these materials as appropriate and translate when possible.

Factor 4 - Resources Available and Costs for LEP Outreach

Metro has committed resources to improving access to its services and programs for LEP persons and has implemented the following measures to reach LEP populations:

- A language chart, posted at the walk-up window at the Metro Pulse at Elm Street, the downtown transit hub, provides a tool for customer service staff to provide language assistance when necessary, Metro contracts with a third-party translation service to provide translation services over the phone on an on-call basis. The costs are covered through our marketing budget.
- Metro contracts with local vendors and uses translation resources to provide translation materials as needed.

- On Request Oral Interpretation – Upon request, Metro provides interpretation services, including American Sign Language, at public meetings, including Board and Committee meetings. Metro also contracts with an interpreter service to provide service via phone or in person upon request.
- Metro’s website sends text alerts, for subscribers, regarding meetings, schedule updates, and other service information to riders, and employs Google Translate so that LEP persons can access service, fare, and other information on the website. The DiriGo Pass fare payment mobile app also includes a text message component that can be used to send out important updates and messages.
- Metro uses Google Translate for its website to translate information. Additionally, Metro includes PDFs and links on its website with information and translated materials.

- When Metro is announcing major service changes, QR code is included on signage to provide LEP persons an opportunity to link to the page on the Metro website with the appropriate information. Google Translate feature on the website will provide translated information. This provides a more efficient way to communicate information to populations.
- The customer service staff utilizes tablets at the up window to assist LEP with languages using Translate. This has been a very cost effective and tool.



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Sample of a service alert flyer. Translations of the flyer are available by scanning the QR code.

Coordination with Community Organizations, include:

- **Immigrant Welcome Center:** This resource for the Greater Portland Region serves as a hub of collaboration providing resources and information to the immigrant community. The top three languages at the Immigrant Welcome Center are Portuguese, French, and Lingala. Portuguese is the most prevalent.
- **Catholic Charities Maine Refugee and Immigration Services (RIS)** Maine’s only refugee resettlement program, **Catholic Charities Maine Refugee and Immigration Services (RIS)** is dedicated to helping those seeking a new life in America become independent, productive members of our community. Since they work specifically with new arrivals, they don’t have an accurate count of overall language populations; however, based on their intake information, the majority of people they welcome speak Arabic, Somali, French, Swahili, Kinyarwanda, Portuguese, Lingala, Haitian- French, and Spanish.
- **Greater Portland Council of Governments (GPCOG) Bus Ambassadors Program**

With funding from the CARES Act, GPCOG, with support from Greater Portland Metro and South Portland Bus Service, developed a Bus Ambassador Program in the region. The Program aims to support new riders understand the region’s transit system and is initially focused on supporting LEP riders. Bus Ambassadors are vetted and trained to work directly with individuals and families.



Greater Portland Metro staff provides instruction to bus ambassadors so they can help LEP persons learn how to ride the bus.

42 New Approaches Translation of Vital Documents – Metro translates vital documents into five languages: Arabic, French, Portuguese, Spanish, and Somali.

Vital Documents:

- ADA overview and application
- Reduced fare information and application
- How to Ride

Guide, including fare information

- Title VI brochure
- Title VI complaint form
- General complaint Form

Based on 2024 information received from Portland Public Schools, Portuguese, Somali, Spanish, Arabic, and French are the top five languages, other than English spoken in our region. City of Portland, Catholic Charities, and Greater Portland Council of Government staffs concur that while these languages may or may not meet “Safe Harbor” provisions, they are the five top languages in the Greater Portland region, and thus translation of these languages would be beneficial to a significant portion of the population in Metro’s service area.



Additional Resources include:

This sandwich board, placed outside Metro’s downtown transportation center hub, highlights passenger rules and safety information in three of the top languages used by LEP persons in the region.

Bus shelters in areas with large populations of LEP persons also include these translations.

Temporary and portable signs are used to target language groups at specific locations where appropriate.

PASSENGER

- DO NOT BLOCK AISLES OR DOORWAYS.**
- DO NOT BOTHER OTHER PASSENGERS. BE CONSIDERATE.**
- OFFENSIVE/HARASSING LANGUAGE OR CONDUCT WILL NOT BE TOLERATED.**
- BE COURTEOUS. USE HEADPHONES, KEEP CONVERSATIONS QUIET.**
- NO EATING OR UNCOVERED DRINKS. KEEP BUSES CLEAN.**

**FAILURE TO FOLLOW POLICIES
COULD RESULT IN LOSS OF RIDING PRIVILEGES.**

العربية
Français
Português
español
Soomaalida



POLICIES



Metro’s Passenger Policies are posted inside all buses. A QR code is included to link to the policies on the Metro website, with can be accessed in multiple languages.

Expanded Partnership and new public awareness campaign with Portland Public Schools:

Through a partnership that began in 2015, Portland’s high school students use Metro transit services extensively and also represent diverse nationalities, races, and languages. Portland Public Schools has a Multilingual and Multicultural Center that accommodates the unique needs of immigrant and refugee families in Portland by providing a centralized system of student registration to ensure data information accuracy. They also provide outreach and services for limited English-speaking parents in the Portland Public Schools. Metro staff and Board work with PPS staff and students to improve communications and respond to the needs of students when possible.

Metro has strengthened its Passenger Code of Conduct to include stronger language around prohibiting and preventing harassment; Additional bus operator training around safety, detection of harassers, and intervention procedures.

New approaches of community outreach:

- **Hybrid Meetings**

Virtual meetings became the standard procedure, due to the COVID 19 pandemic, for the majority of meetings between March 2020 and March 2022. The ease of clicking a link to attend a meeting made it convenient for people to attend. **Today, most public meetings are available both in person and virtually to encourage attendance.** Interpretation of meetings are available upon request.

- **Surveys**

Metro works with GPCOG to support our community engagement efforts. Metro also conducted a rider/non-rider survey in October 2022. The on-board passenger survey indicated that, while 98.2% of respondents speak English, about 7.8% of passengers spoke English “not well or not at all”. Additionally, 10.6% of respondents spoke French, 4.5% spoke Spanish, 2.3% spoke Portuguese, 0.8% spoke Somali, and 1.8% spoke another language.

Sec. 5.0 DECISION-MAKING BODIES

Decisions regarding policy, service changes, fares, operations, and capital programs are made by a municipally appointment board of directors. Metro has a governing board of nineteen (19) members, as provided by statute. Members are appointed by municipal leadership, with membership and voting power proportional to service hours in each community.

Currently, eighteen (18) members are Caucasian and one (1) is Native American. Metro also has three committees – Executive, Finance, Advocacy, Marketing and Communications, and Planning and Operations – comprised of board members. The public is invited to attend these monthly meetings, and public comment is welcome. Metro also forms task force groups around partnerships and programs to help guide decisions around routes, schedules, and other operations. **Table 6** lists board and other committees and their racial breakdown.

Table 6: Breakdown of Board-Committee Members by Race: January 2025 – (current)

Board, Committee, or Task Force	Caucasian	Latin	African American	Asian American	Native American
Metro Board of Directors	19	0	0	0	0
Executive Committee	5	0	0	0	0
Finance Committee	4	0	0	0	0
Planning and Operations	4	0	0	0	0

Marketing and Communications Committee	3	0	0	0	1
Advocacy Committee	4	0	0	0	0

Sec. 6.0 SERVICE STANDARDS AND POLICIES

Metro has developed quantifiable service standards and policies. These standards have been updated and were presented at a public information session in March 2025.

These service standards include:

- Vehicle Load
- Headways (Frequencies)
- On-time performance
- Service Availability Standards
- Vehicle Assignments
- Transit Amenities

6.1 Vehicle Load Standards

As shown in **Table 7**, Metro has adopted these load factors. The Preferred Load category equals 1.5 times the seated capacity. In general, Metro staff assigns larger equipment to higher ridership routes.

Table 7: Vehicle Load Standards by Bus Type

Vehicle Type	Seated Capacity (SC) Preferred	Standing Capacity (1.5 x SC)	Total Capacity	Maximum Load (2 x SC)
2011 35' Gillig	31			
2014 35' Gillig	31			
2016 35' Gillig				
2018 40' New Flyer				
2019 40' New Flyer				
2020 40' New Flyer				
2021 40' New Flyer				
2022 35' Proterra				
2022 35' Gillig				
2023 35' New Flyer	37			
2023 30' Gillig	26			

Metro relies on Automatic Passenger Counts and information received from fare boxes in addition to Metro street supervisors' reports and driver and passenger feedback. If circumstances warrant, Metro will conduct an on/off survey of a specific route outside the normal survey cycle.

6.2 Vehicle Headway Standards

Metro’s general vehicle headway standard is to provide headways on all local routes that are 60 minutes or better. Among Metro’s **thirteen (13) bus** routes, there is headway variation as a result of ridership demand and the constraints of municipal budgets.

Metro’s **target** long-term headway goals include:

- Weekday Peak Period (6-9am and 3-7pm) – 15-minute headways
- Weekday Off-Peak Periods (midday, evening) – 30-minute headways
- Saturdays – 30-minute headways
- Sunday/Holidays – 30-60-minute headways

Table 8 shows Metro’s current headways as of April 2025.

Route Name/Number	Service Type	Weekday Peak	Weekday Off Peak	Saturday	Sunday
Route 1 Congress Street	Urban Fixed Route	30 min	30 min	60 min	60 min
Route 2 Forest Ave	Urban Fixed Route	30 min	30 min	60 min	60 min
Route 3 Crosstown	Crosstown	60 min	60 min	60 min	60 min
Route 4 Westbrook	Urban Fixed Route	30 min	30 min	45 min	45 min
Route 5 Maine Mall	Urban Fixed Route	30 min	30 min	45 min	45 min
Route 7 Falmouth - Jetport	Urban Fixed Route	40 min	40 min	60 min	60 min
Route 8 Peninsula Loop	Urban Circulator	30-35 min	30-35 min	60 min	60 min
Route 9A/B North Deering	Urban Fixed Route	15-30 min	30 min	30 min	60 min
Route 21 Willard Beach/SMCC	Suburban Fixed Route	45 min	60 min	60 min	90 min
Route 24A Maine Mall via Broadway	Suburban Fixed Route	120 min	120 min	120 min	90 min
Route 24B Maine Mall via Highland Ave.	Suburban Fixed Route	120 min	120 min	120 min	N/A
Husky Line Portland Westbrook Gorham	Limited Stop	30 min	30 min	45 min	45 min
BREEZ	Express	30-60 min	70 min	150 min	N/A

6.3 On-time Performance Standards

Among the most important service standards for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than **one (1) minute early** and **six (6) or more minutes late (00:59 early to 5:59 late)**
- Metro’s on-time performance standard is 90% or greater at both route and system levels.

6.4 Service Availability Policies

At the present time, geographical and budgetary challenges prevent Metro from setting a standard whereby a set percent of all residents in the service area are within a certain distance of public transit service. However, the agency will conduct planning and goal-setting activities with the public and Board of

Directors to develop and adopt a policy goal.

6.5 Vehicle Assignment Policy

With the exception of Metro's Husky Line and the BREEZ express route, vehicles are not assigned to specific routes and are circulated throughout the system based on ridership demand and operational or geographic limitations. Within these constraints, Metro's dispatchers and operations managers are trained to deploy vehicles as evenly as possible throughout the system.

The Husky Line service has a dedicated fleet of five (5) buses, branded with the University of Southern Maine (USM)'s mascot, as the route connects the two USM campuses. The Husky Line is partially funded using contributions from USM, and USM students make up the bulk of Husky Line ridership.

Four (4) Metro BREEZ buses are specifically branded for the express service between Portland, Yarmouth, Freeport, and Brunswick. Aside from branding, these buses are outfitted to maximize passenger comfort while riding on highways. While these buses generally only operate on the BREEZ route, they were procured under the assumption that they may be pressed into service on other routes as well.

6.6 Transit Amenities Policy

- *Bus Stops* – Metro provides approximately 700 bus stops across its service area, which includes Brunswick, Falmouth, Freeport, Gorham, Portland, Scarborough, South Portland, Westbrook, and Yarmouth. Bus stops are ¼ mile apart along most corridors and route segments and 1/8 mile apart in higher density urban environments. Requests for bus stop sites which deviate from this policy – particularly route deviations — are evaluated on a case-by-case basis based on matters of potential ridership demand, timing and impact to the schedule, mileage, impacts to travel-time of the base route, and costs and resources.
- *Bus Shelters* – As of March 2025, approximately 74 bus stops are equipped with bus shelters. Bus shelters are deployed based on several factors, primarily ridership (boardings per day) and availability of right-of-way. Due to constrained conditions, Metro is unable to install bus shelters in many locations without an agreement with the adjacent property owner. Metro seeks to add bus shelters when sites are redeveloped and as part of municipal infrastructure projects along bus routes.
- *Transit Centers* – Metro's Downtown Portland Transportation Center (Metro Pulse) is centrally located on the Portland Peninsula on Elm Street at Congress Street. A walk-up window is open for customers to interact with customer service staff – to purchase fare media and ask questions. All of Metro's routes, except Route #3, are within walking distance of this location, which is open weekdays from 6:30 am to 7:30 pm

The South Portland Transit Center is located in the Mill Creek area of South Portland. The building has seating and is open year-round for riders to wait for the bus. The Transit Center is a hub for South Portland Routes 21, 24A, and 24B.

- *Route and Schedule Information* – Metro provides individual printed route and schedule information upon request at the Metro Pulse, the downtown transit hub, and at locations throughout the region such as municipal buildings, bus stations, the airport, and train station. Route maps and schedules can be downloaded and printed from our website at www.gpmetro.org.
- *Real-time Bus Arrival Information* – Real time arrival information has been available on Metro buses since 2016. Metro staff publishes GTFS feeds for publication by developers, and works directly with major developers to ensure feeds are digested and displayed as intended. Metro publishes a live map on our website (www.gpmetro.org/live) and typically points passengers to real-time

information available on the Umo and Transit apps, as well as Google Maps.

- *Wi-Fi* – All Metro buses have free wi-fi available for riders to access.
- *Bicycles* – All Metro buses are equipped with bicycle racks with a capacity of three (3) standard buses.
- *Metro Bus Garage* – The bus storage garage is located next to the District headquarters on Valley Street in a light industrial area away from residential neighborhoods.

6.7 Monitoring Service Standards

For ongoing monitoring and measurement of service standards and policies, Metro proposes to use the following schedules and methods:

Table 9: Service Standards Monitoring Thresholds

Service Standard/Policy	Evaluation Frequency	Methodology
Vehicle Load	Semi-annually	Automatic Passenger Counts/Fare Collection
Vehicle Headways	Annually	Schedule review compared to adopted
On-Time Performance	Monthly	Automatic Vehicle Locator (AVL)
Service Availability	Annually	Geographic Information System
Vehicle Assignments	Quarterly	Automatic Vehicle Locator (AVL)
Transit Amenities	Annually and with deployment of new amenities	System wide Review

6.8 Construction Equity Analysis

Over the past three years, Metro did not plan for the construction of any new facilities. When Metro plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub, or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Metro will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

Sec. 7.0 PROGRAM SPECIFIC REQUIREMENTS

7.1 Title VI Monitoring

The results of monitoring of service standards as defined in this program may be obtained by contacting Metro staff.

7.2 Subrecipient Compliance

As of this plan's adoption, Metro's subrecipients are: Greater Portland Council of Governments (GPCOG) and Biddeford Saco Old Orchard Beach Transit (BSOOB Transit).

Attached: Subrecipient Monitoring Policy

7.3 Equity Analysis for Facility

During the past three (3) years, Metro has not constructed a vehicle storage, operations, or maintenance facility.

7.4 Demographic Service Profile

Because Metro operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

Sec. 8.0 GRANTS, REVIEWS, AND CERTIFICATIONS

8.1 Pending Applications for Financial Assistance

Metro has no pending applications for financial assistance from any federal agency other than the FTA.

8.2 Pending FTA Grants

Metro has no pending grants at this time.

ME-2016-016 2016 Operating Assistance & Capital Maintenance
ME-2016-017 Regional Bus Shelter/Sign Project
ME-2017-008 2017 Operating Assistance & Capital Maintenance
ME-2019-010 2019 Operating Assistance & Capital Maintenance
ME-2019-013 Battery Electric Bus
ME-2020-010 CARES
ME-2020-025 2020 Operating Assistance & Capital Maintenance
ME-2021-016 2021 Operating Assistance & Capital Maintenance
ME-2022-011 2022 Operating Assistance & Capital Maintenance
MR-2023-002 BREEZ Bus Replacement
ME-2023-012 ARPA Recovery Projects
ME-2023-017 ARPA Recovery Projects- Regional Mobility For All
ME-2023-018 CRRSAA Act Mobility For All
ME-2023-044 ME-2023-044: 2023 Operating Assistance & Capital Maintenance
ME-2024-010 2024 Operating Assistance & Capital Maintenance

8.3 Open FTA Grants

8.4 Civil Rights Compliance Reviews in the Past 3 Years

Metro has not been the subject of any such reviews since its

Recent Annual Certifications and Assurances

Metro executed its most recent Certification and Assurances to the FTA and is in the process of executing 2022 certifications and assurances.

8.5 Previous Triennial Review Findings

Metro's 2019 Triennial Review resulted in no findings with respect to its Title VI Plan/activities.

Sec. 9.0 CONTACT

For additional information on the Greater Portland Transit District's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Glenn Fenton, Executive Director
Greater Portland Transit District
114 Valley Street
Portland, ME 04102
Tel: 207.517.3025 | email: gfenton@gpmetro.org | gpmetro.org

Sec. 10.0 BOARD ADOPTION OF POLICY

Metro's Board of Directors approved the Title VI Program at its March 27, 2025 meeting. A record of the DRAFT minutes is provided as **Attachment H**.



Complaint Form (combined)

Date _____

Section I: Contact Information			
Name:			
Address:			
Telephone # where you wish to be contacted:			
E-mail address:			
Accessible Format Requirements:	Large Print	Audio	Other
Section II: Type of Complaint			
Type of Complaint (check mark or x):			
1. General Complaint or Concern: Bus service, schedule or specific incident. ()			
2. Civil Rights / Title VI Complaint: Discrimination based on race, color or national origin: ()			
3. ADA Discrimination: Discrimination based on a disability. ()			
Are you filing this complaint on your own behalf?		Yes	No
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party?			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:		Yes	No
Section III: Details of Complaint or Incident			
1. General Complaint, Concern or Incident:			
Date of incident: (Month, Day, Year): _____ Time _____ AM PM			
Bus # _____ Route # _____ Inbound / Outbound Driver # or information _____			
Additional information (location, details, witnesses, illustrations, etc.):			
2. Civil Rights/Title VI Complaint:			
Discrimination based on (check all that apply): () Race () Color () National Origin			
Explain below as clearly as possible what happened and why you believe you were discriminated against. Describe all persons involved. Include name and contact information of person (s) who discriminated against you (if known) as well as names and contact information of witnesses.			

Revised 2019

ENGLISH

Section V:		
Have you filed this complaint with any other Federal, State or local agency, or any Federal or State court? () Yes () No		
If yes, check all that apply and provide agency or court name:		
() Federal Agency: _____	() Federal Court: _____	
() State Agency: _____	() State Court: _____	
() Local Agency: _____		
Please provide information about a contact person at the agency/court where the complaint was filed:		
Name:	Title:	Agency:
Address:	Telephone:	E-mail:
Section VI:		
Name of agency complaint is against: _____		
Contact Person: _____		
Title: _____		
Telephone Number: _____		
E-Mail address: _____		

You may attach any written materials or other information that you think is relevant

to your complaint. Signature and date required below:

Signature

Date

Submission Options: You may submit this form in person at the address below, by mail to the address below or you may scan this completed form along with all supporting materials and e-mail to the individual stated below.

This form is also available online at: gpmetro.org/about-us/policies

Transit Operations Manager

Greater Portland Transit District 114 Valley Street
Portland, ME 04102
Tom Ridge – tridge@gpmetro.org



Policies and Procedures for General, ADA and Title VI Complaints

Rev. February 2022

PURPOSE

Ensure that Metro's customers and the general public are aware of and have ready access to methods to communicate complaints about Metro's services, infrastructure, projects and policies.

POLICY

Metro will provide a complaint process that meets the following goals:

- Accessible and well-advertised to the general public, to persons with disabilities and to populations covered by the Title VI of the Civil Rights Act of 1964;
- Provides for prompt and equitable resolutions;
- Contains appropriate due process standards;
- Documented internally in accordance with federal requirements.

STAFF RESOURCES

- Lead Staff – Chief Transportation Officer has overall responsibility for implementation.
- Support Staff – Transit Operations Manager, Director of Human Resources, Director of Transit Planning, Marketing and Community Outreach Manager, Bus Operators, Customer Service Staff.

CUSTOMER INFORMATION

Members of the public who have a general complaint are encouraged to complete the **Customer Contact/Complaint Form**, but may also contact Metro and submit a complaint by phone, e-mail or in person. **This form is attached to this policy as Attachment A.**

Individuals who believe they have been the subject of discrimination due to disability (ADA) or race, color or national origin (Title VI) must file a written and signed **Customer Contact/Complaint Form** up to 180 days from the date of the alleged discrimination. Metro staff will be available to assist with completing the form if needed and can provide forms in accessible formats or provide language assistance.

Individuals can submit their complaint in the following ways:

- Complete the Customer Contact/Complaint Form at gpmetro.org and SUBMIT ONLINE.
- Download the Customer Contact/Complaint Form from Metro's website, complete form and e-mail to info@gpmetro.org or mail to Metro at 114 Valley Street, Portland, ME 04102.
- Acquire the Customer Contact/Complaint Form from Metro's offices and submit to Customer Service staff.
- Contact a Metro staff member by phone (207-774-0351) or e-mail (info@gpmetro.com) to communicate your complaint and Customer Service Staff will complete the form.

Attachment B

PUBLIC INFORMATION

Metro will ensure access to the complaint process by posting this policy and the related complaint form on its website and having hard copies available at the Metro Pulse at Elm Street (Metro's downtown transit center). In addition, Metro will update printed materials to reference this process and postings will be placed at the Metro Pulse. Metro staff will conduct (and document) outreach to appropriate groups and organizations. Materials will note that this policy can be made available in five languages accessible formats. Metro's **Manager of Marketing and Community Outreach** shall have direct responsibility for this part of the procedure.

INTERNAL TRAINING

Metro will train bus operators, administrative staff and customer service staff on the availability and implementation of these policies and procedures. Metro's **EEO Director** shall have direct responsibility for this part of the procedure.

COMPLAINT HANDLING PROCEDURES

1. Within two (2) business days, the **Transit Operations Manager** will notify the customer that he/she received the complaint and will conduct an investigation. Within the same timeframe, the General Manager will be immediately notified of any complaints identified as or initially believed to be ADA or Title VI.
 - a. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered cause for a determination of no investigative merit.
2. FOR GENERAL COMPLAINTS - within ten (10) business days from receipt of a complete complaint, the **Transit Operations Manager** will complete a written report outlining the investigation's conclusions and what, if any, resolutions will be implemented.
3. FOR ADA and TITLE VI COMPLAINTS – within two (2) business days from receipt of a complete complaint, the Transit Operations Manager (or designee in the case of absence) will report the complaint to the EEO Officer who will determine whether the complaint has sufficient merit to warrant additional investigation as an ADA or Title VI complaint. Within three (3) business days from this decision point, the EEO Officer (or designee) will notify the Complainant whether or not a formal ADA or Title VI investigation will be pursued.

If the complaint is deemed to have investigative merit: A complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, a finding with recommendations for remedial steps as appropriate and necessary. The remedial steps, if any, will be implemented as soon as practicable. The Complainant will receive a copy of the final report together with any remedial steps.

If the decision is not to investigate as an ADA or Title VI complaint: the notification shall specifically state the reason for the decision.

- a. The complainant may appeal the EEO Officer's decision by making a written request to the Executive Director within 30 days of receiving the EEO Officer's decision.

Attachment B

- b. Upon receiving an appeal, the Executive Director will evaluate the appeals request, the original complaint, the facts of the case including the investigation process, conclusions and outcomes. The Executive Director's primary evaluation criteria will include: proper application of Title VI/ADA law and regulations, consistent and equitable investigation process, sound judgment and considerations of operational practicality.
 - c. The Executive Director will respond to the appeal within ten (10) business days.
 - d. Complaints may also be filed with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination. Complaints to FTA may be submitted to the following office:
Federal Transit Administration Office of Civil Rights
55 Broadway, 9th Floor Cambridge, MA 02142.
4. The EEO Officer will retain all pertinent records of ADA and Title VI complaints for five (5) years. Using MS Excel, MS Access or other appropriate database tool, the EEO Officer will maintain a summary log of all complaints received for one (1) year. The log shall include the date the complaint was filed, the type of complaint (i.e., General, ADA, Title VI), a summary of the allegations, the status of the complaint, and actions taken by Metro in response to the complaint.

ATTACHMENT C

Title VI Log of Investigations, Lawsuits, and Complaints

March 2022 - February 2025

Type	Date	Contact Summary	Corrective Action Taken	Status
Investigations	4			
Lawsuits	0			
Complaint	5/2/2022	The driver kicked a Black student off the bus for joking and laughing. Other students felt uncomfortable and also exited the bus.	Video reviewed. and see that the driver did stop the bus at Congress/Gilman and told that one student he had to get off the bus. The driver was not going to go any further until the student got off the bus. Other students did follow. This was forwarded to HR	Closed
Complaint	6/10/2022	Customer denied riding due to the stroller being too large. Believes it was because she was nonwhite.	Finding there is insufficient evidence to concluded the driver violated Metro's Title VI policy.	Closed
Complaint	7/12/2022	Driver allegedly being aggressive and yelling angrily at the Black immigrant who had an issue scanning their card.	Finding there is insufficient evidence to concluded the driver violated Metro's Title VI policy.	Closed
Complaint	7/24/2022	Driver was harassing/mockng riders based on their ability to speak English. Could qualify as discrimination .	Investigation Completed. Driver was made aware of the issue.	Closed
Complaint	2/15/2023	Passenger boarded the bus while the driver wasn't on it. Driver boarded and asked customer to the front. The passenger said the driver was very disrespectful, and she felt he was discriminatory towards her. He also singled her out when there were two other passengers on board.	The video was reviewed. Finding of no disrespect or discrimination towards the passenger.	Closed
Complaint	7/19/2023	The customer is a transgender woman misgendered by driver. Referred to as a man. Misgendering is against the law in Maine.	Couldn't find incident on video and customer did not return.	Closed

**Policy and Procedures for
Soliciting and Considering Public Comment
on Fare Increases and Major Service Reductions**

Rev. August 2016

PURPOSE

Define thresholds for major service reductions/fare changes and outline a process for soliciting, receiving and considering public comments to ensure GPTD implements a broad, inclusive, equitable and accessible decision-making process.

STAFF RESOURCES

- Lead Staff – Marketing Manager

POLICY

GPTD will implement the public participation plan outlined below when changes to services or fares meets/exceeds one or more of the following thresholds:

- A fare increase or significant change in the method of fare payment.
- A new route is being established.
- An existing route is proposed for elimination.
- Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered.
- Any system wide change in service hours that exceeds (plus or minus) 10% of current total service hours.
- Proposed modifications to routes or groups of routes that would affect more than 25% of the riders using the affected routes.
- Proposed schedule changes on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.

PUBLIC PARTICIPATION PROCEDURES:

Public Notice – A public hearing(s) for fare increases and major changes/reductions shall be advertised in a daily publication of general circulation at least twenty (20) calendar days prior to conducting such hearing and shall be held at a location that is accessible to all interested persons including persons with disabilities and easily accessed by public transportation. An explanation of the content; along with the date, time, and location of the hearing will be published along with the instructions for submitting written comments; contact information for questions or additional information; the due date for the written comments.

Additional notifications will be issued using the following measures:

- “Rider alerts” and notices will be posted on-board fixed-route vehicles indicating when and where the meeting will take place at least twenty (20) calendar days in advance of the scheduled public meeting date.
- Notification will be included on GPTD’s website at least twenty (20) calendar days prior to the meeting along with notifications using social media.
- Notification will be included in GPTD’s agency newsletter and/or e-mail blast.
- A press release will be issued at least ten (10) calendar days prior to the meeting.
- The public hearing notice will be published in at least one publication serving minority communities at least twenty (20) days prior to conducting the meeting.
- Public meeting notices will be displayed at the transit center leading up to the public meeting.

Public Meetings – GPTD makes efforts to ensure that scheduling and locations are accessible to the public (this includes a location near public transportation, a time when public transportation is available; as well as an accessible building/room for individuals with disabilities).

- Public hearings will be held at central locations to inform the public of the planning process, solicit ideas, input, and feedback. GPTD will provide a presentation to attendees that explain the proposed service or fare changes before taking questions and comments.
- At least one (1) meeting will take place in the evening and/or on a weekend to accommodate those with traditional work schedules. Additionally, one meeting will be held during a traditional work day to accommodate those who work in the evenings or weekends.
- GPTD will ensure at least one (1) public hearing is implemented in each member community served.
- Upon request, GPTD will provide interpreters for those who do not speak English, materials for individuals with visual impairments, and sign language interpreters. The availability of these services will be mentioned in public notices.
- GPTD will conduct outreach to persons with a Limited English Proficiency (LEP) by submitting public meeting notices to local social agencies and public schools.

Receiving Public Comments – GPTD will document comments received during the course of the public input process in the following ways:

- Verbal Statements at Public Hearing – GPTD staff will formally record verbal comments made at each public hearing.
- Written Comment Form/Survey – GPTD will provide each attendee a comment form/survey on which to record their comments on the proposed service or fare changes.
- Online Comment Form/Survey – GPTD will include on its website an online comment form for members of the public to complete if they were unable to attend any of the meetings. The online comment form will be supported by information explaining the proposed service or fare changes.

GPTD will establish a fourteen (14) day window following the last public hearing implemented for members of the public to complete the online comment/survey or submit the written comment/survey. GPTD will also ensure that comments e-mailed to GPTD or taken by phone are included in the record of public comments.

Consideration of Public Comments – GPTD will consider public comments in the following ways:

- Analyzing standardized survey results to develop information on 1) support or opposition to the proposed service or fare changes, and 2) the impact of the changes on respondents’ travel and daily life.
- Conducting “content analysis” of all written comments and transcribed comments (either from public hearing notes or comments submitted by phone). The content analysis will extract the key concerns or opinions expressed by participants and then code these concerns in a manner that can be subject to analysis.

Results of these analyses may lead GPTD staff to recommend modifications to the proposed service or fare changes to the Board’s Ridership Committee.

The results of GPTD’s analyses, the full record of written or transcribed comments received, summary survey results, and updated service or fare change proposals will be presented to GPTD’s Board Ridership Committee for review, consideration and further recommendations. This committee meeting is open to the public.

Following the Ridership Committee meeting, the same information along with updated recommendations for actual service or fare changes will be presented to the Board of Directors for



SUBRECIPIENT AWARD AND MONITORING PROCEDURES

January 2023

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GREATER PORTLAND TRANSIT DISTRICT SUBRECIPIENT MONITORING PROCEDURES

PURPOSE AND SCOPE

As a direct recipient of federal funds, specifically Federal Transit Administration, GP Metro is required to comply with FTA Super circular and in more detail Circular 5010.1E (or its most recent successor version). As such, if GP Metro enters into an agreement to pass-through federal funding to another entity, that entity, or subrecipient, is also required to comply with FTA regulations for expending federal funds.

This purpose of the Subrecipient Monitoring Procedures is to document the requirements for subrecipient award, monitoring and closeout. Application of these procedures will ensure the following:

1. Provide GP Metro grant management staff with guidelines and procedures that will meet federal requirements for the oversight of subrecipients.
2. Provide subrecipients with required guidelines
3. Ensure contract requirements and technical specifications are met by subrecipients
4. Monitor compliance of federally funded assets that are maintained by subrecipients
5. Monitor compliance with milestone progress reporting
6. Monitor performance, compliance and quality of subrecipients, which can be used in evaluation of the subrecipient for future pass through opportunities.

The scope of this document covers subrecipient grant management from award through final reporting and close out. This Manual is complimentary to the District's Federal Procurement Procedures Manual and Grant Management Manual.

Note: Any references to FTA Circulars or regulations assumes the most recent version.

POLICY

In accordance with FTA requirements, GP Metro will require all subrecipients to demonstrate the entity has effective policies and procedures to ensure proper management of FTA grant funds, based on effective internal control practices to prevent waste, fraud and abuse, and to facilitate financial reporting.

INTENT

Sound fiscal management procedures are essential in assuring proper security and accounting of public funds, and cannot function properly without the cooperation and assistance of all GPTD departments. It is the intent of GPTD to comply with federal grant management regulations for subrecipient award and compliance monitoring, and also to practice efficient and prudent fiscal management.

In order to ensure full understanding and execution of these procedures, all GPTD management and administrative staff are provided a copy of this document. The Finance staff will provide ongoing clarification and training to staff as needed.

FTA Circular 5010.1 (or its most recent successor version) is included in and considered to be part of this manual by reference.

AUTHORITY AND ROLES

GPTD's Executive Director, through its Board of Directors, is generally responsible for assuring compliance with these procedures. The oversight and enforcement of these procedures and of managing all financial processes lies with the Finance Director. All Managers of GPTD are charged with understanding and following the procedures, and to ensure understanding and adherence by their respective staff.

Primary staff involved in subrecipient award and compliance monitoring are the Executive Director, Finance Director, Accounting Manager, Director of Transit Development and Chief Transportation Officer.

I. Subrecipient Award and Agreement

GP Metro staff will work with subrecipient entities to draft an agreement for the federally funded project. It is expected that the subrecipient entity will include/inform all staff members involved in the project of the federal compliance requirements and oversight process.

Federal requirements and clauses will be provided in an appendix of the agreement. During the agreement phase, subrecipient entities will be required to:

1. Sign lobbying certification (if agreement exceeds \$100,000)
2. Sign debarment certification (if agreement exceeds \$25,000)
3. Provide documentation of adequate insurance coverages listing GP Metro as additionally insured (COI)
4. Provide the subrecipient's Unique Entity Identifier (UEID formally DUNS)
5. Provide documentation of an approved indirect cost rate (if applicable)

When the agreement is executed, the subrecipient agrees to comply with all applicable Federal requirements, and understands it will be subject to ongoing monitoring and oversight by GP Metro.

GP Metro cannot release funds without an executed grant and subrecipient agreement. If the subrecipient award exceeds \$25,000, GP Metro will report to FSRS at www.FSRS.gov by the end of the month following the month in which the agreement was executed.

Subrecipients that receive \$750,000 or more in federal funds in any year (from all federal sources) must have an annual single audit completed by an independent auditor in accordance with FTA requirements.

During the agreement phase, subrecipients will be required to provide the most recent Single Audit for GP Metro's review. Additionally, subrecipients will be required to have Single Audits completed (if total of all Federal awards exceeds or is equal to \$750,000) for the entire agreement term, and provide documentation of those results to GP Metro.

Additionally, subrecipients are required to have a Title VI program that complies with FTA requirements. During the agreement phase, subrecipients will be required to provide the most recent published Title VI program for GP Metro's review.

If, upon review, it is determined that subrecipient agreements are missing required FTA clauses, certifications or documentation, GP Metro will draft an amended agreement for execution that includes the required missing elements.

II. Subrecipient Monitoring

GP Metro monitors subrecipient activities necessary to ensure that federal awards are used for authorized purpose, are in compliance with laws, regulations, and agreements

and goals of the project are achieved. GP Metro's Finance Department is responsible for ensuring that grant funds are used for awarded purposes. GP Metro's management of subrecipients will include the following tasks:

1. Development subrecipient agreement and ensure the document is fully executed
2. Monitor financial status of grants and projects
3. Ensure subrecipient is completing quarterly milestone or progress reports and submitting with invoices for payment
4. Verifying reimbursement requests are fully documented and review prior to disbursement of funds
5. Evaluate subrecipient risk to determine level of monitoring and oversight, including method and frequency of these activities.
6. Ensure monitoring is completed and documented

A. Fiscal Monitoring

Timely receipt of financial records and reports will allow GP Metro to effectively monitor the financial status of grants. Fiscal monitoring of subrecipients includes, but is not limited to:

1. Reviewing reimbursement requests, which should include documentation and backup for all grant project activity for the reimbursement request period
2. Comparing costs to project budget, where applicable
3. Reviewing reimbursement requests to ensure
 - a. Expenses occurred within the grant period
 - b. Are eligible expenses for the project (award)
 - c. Are support with accurate documentation
 - d. Are not duplicate charges

Reimbursement requests submitted to GP Metro should contain full and complete documentation, so that if an uninvolved party were asked to review and approve the request, the information provided would allow them to do so. Such information would include documentation such as progress report or work statements, invoices for support services and materials, certification by the subrecipient that the work has been satisfactorily rendered, copies of the original bills, invoices, expense accounts, and miscellaneous supporting data retained by the subrecipient including, but not limited to work records, rates, material and equipment costs, and list of names, hours worked, and wage information.

B. Performance Reporting

GP Metro's Finance Department is responsible for managing FTA milestone progress and financial status reports. Subrecipient monitoring and oversight activities are planned based on the level of risk identified through the subrecipient risk assessment process. The Finance Department will maintain documentation on subrecipient monitoring and oversight activities in the contract file, either in paper form or electronically.

1. Subrecipients are required to submit progress reports quarterly, ideally with their reimbursement requests. As the Federal FFR and MPR reports are required quarterly, but the end of the following month, subrecipients are strongly encouraged to submit their quarterly reports by the 20th day after quarter end.

C. Risk Assessment

GP Metro will determine the level of risk of each subrecipient. The level assigned (low, medium, high) will determine the method and frequency of monitoring and oversight activities completed by GP Metro. When evaluating the level of risk, GP Metro considers the following:

1. Grant sources and amount awarded to the subrecipient
2. Subrecipient experience with federal grant funds
3. Financial audits and findings
4. Quarterly performance reports
5. Past experience with subrecipient

The risk assessment will determine the level of monitoring and oversight activities completed by GP Metro staff.

- High Risk – more in-depth oversight and frequent monitoring, detailed compliance reviews and site visits and/or desk reviews
- Medium Risk – detailed compliance reviews, site visit discretionary based on prior compliance reviews
- Low Risk – compliance review optional with written justification

D. Site Visits

Subrecipients may receive on-site compliance reviews. The frequency and effort depend on the level of risk and length of the funding agreement. Elements of an On-site review entails the following:

- Review team requests subrecipient documents and sets up on-site meeting
- Subrecipient sends information to recipient
- Review team examines information using FTA Triennial Review guide and circulars

- Review team sends list of potential issues to subrecipient as preparation for on-site visit
- Conduct on-site review with subrecipient

Activities covered during On-site review:

- Entrance conference
- Interviews and review of outstanding documentation
- Visits and inspect federally funded facilities, vehicles and other major assets (where applicable)
- Preliminary findings of deficiency
- Exit conference

At the exit conference, the preliminary findings of the deficiency will be distributed by the review team and discussed with the subrecipient along with proposed corrective actions (a corrective action plan) and dates for completion. The subrecipient should advise if any comments have been misstated or if there are any obstacles to the implementation of corrective actions.

E. Closeout

The grant closeout phase signifies that all the activities in the grant are complete and federal funds have been expenses. GP Metro will conduct a formal closeout review of all subrecipient awards to ensure all requirements have been met and properly documented, and that all reimbursement requests have been approved and processed.

The subrecipient must submit closeout documentation in the form of a final progress report within 45 days of the completion of grant activities.

Appendix H - Federal Reference Documents

1. [2 CFR 200](#)
2. [FTA Certifications and Assurances](#)
3. [FTA Master Agreement](#)
4. [Third Party Contracting Guidance](#)
5. [5010.1E Grant Management Requirements](#)
6. [Triennial Review Guide](#)
7. [FTA Best Practices Procurement Manual](#)

Discrimination is Prohibited by TITLE VI

There are many forms of illegal discrimination based on race, color or national origin that limit the opportunity of minorities to gain equal access to services and programs.

Among other things, in operating a federally assisted program, **a recipient cannot, directly or indirectly:**

- ▶ **Deny program services, aids or benefits,**
- ▶ **Provide a different service, aid or benefit, or provide them in a manner different than they are provide others; or**
- ▶ **Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.**



TITLE VI PROGRAM

How to file a complaint:

Members of the public who feel they have been the subject of discrimination, may file a signed, written complaint up to 180 days from the date of the alleged discrimination.

Complaint forms and instructions can be accessed online at gpmetro.org or by visiting Metro's Transit Center at 21 Elm Street or Main office at 114 Valley Street in Portland. Forms can also be mailed upon request. Metro's TITLE VI Complaint Form asks for the following information:

- Name, address, telephone number
- Date and location of incident
- Detailed description of incident
- Identification of witnesses

Complaints must be signed and dated, and mailed or delivered to:

**Greater Portland Transit District
Metro
114 Valley Street
Portland, ME 04102**



Metro Transit Center

21 Elm Street in Portland, across from the Portland Library, one block from Congress Street.

**TITLE VI PROGRAM
OF THE CIVIL RIGHTS ACT OF 1964**

March 2019

Your Rights under Title VI of the Civil Rights Act of 1964:



“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.”

If you feel that you have been discriminated against based on race, color or national original, you may file a complaint with Greater Portland transit District Metro.

Look for information about this process on the back page of this brochure.



“Simple Justice requires that all public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial discrimination.”
President John F. Kennedy

Public Involvement

Public involvement is an important part of transportation planning and project development. Metro uses a variety of methods to gather public input on services, standards and projects, including:

- Board and Committee Meetings
- Annual Public Meetings
- Community Workshops
- Task Forces for special initiatives
- Online Comment Form(s)

For information:

- gpmetro.org / 207-774-0351
- Email: info@gpmetro.org
- Visit - 114 Valley St., Portland

Limited English Proficiency (LEP)

The federal government and those entities receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have access to programs, services and information.

Who is a Limited English Proficient

Person? Persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be Limited English Proficient or “LEP.” These individuals may be entitled to language assistance with response to a particular type of service, benefit or encounter. Metro works with a third-party phone interpreter service on an on-call basis and will also provide interpreters for public meetings, on request, with advance notice.