#

**Requirements for Federal Transit Administration Subrecipients**

**Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.**

# The Montana Department of Transportation Rail, Transit and Planning Division is responsible for managing funds from the Federal Transit Administration (FTA). These funds are used for the planning, development, operation, and integration of transit and rail into the statewide transportation system. The Office of Civil Rights works with the Planning Division to implement and monitor compliance with FTA's civil rights requirements.

**Title VI Program**

*FTA Circular 4702.1B, Chapter 3* for FTA Subrecipients:

[Title VI Requirements & Guidelines for FTA Recipients](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf)

FTA’s *Title VI Circular 4702.1B* provides guidance to grantees on how to comply with Title VI regulations, as well as to ensure grantees provide meaningful language access to persons who are limited English proficient. The FTA requires all subrecipients of FTA financial assistance to develop a Title VI plan and ensure nondiscrimination on the basis of race, color and national origin. As the primary recipient of FTA funding, MDT is required to monitor subrecipients for compliance with Title VI, including collecting and reviewing subrecipient Title VI plans.

The following template is intended to assist subrecipients in developing a Title VI plan consistent with FTA requirements. By completing this document, you are stating that your board of directors, appropriate governing entity, or officials responsible for policy decisions and/or approval of board meeting minutes understand the required *FTA Circular 4702.1B, Chapter 3* regulations and agree to adopt all MDT procedures to comply with FTA Title VI Program guidelines:

Agency: **PHILLIPS TRANSIT AUTHORITY**

# TITLE VI PLAN

**Year:** 2025

**Title VI Contact Name:** Laura Pankratz

**Title VI Contact Phone:** 406-654-5301

**Title VI Contact Email:** ­­­­­­phillipstransit@itstriangle.com\_\_\_\_\_\_\_\_\_\_\_\_

**Introduction to Agency**

Phillips Transit Authority is a non-profit entity organized according to Montana non-profit requirements and was established according to MCA 7-14-1001 through 7-14-1007. It is a compilation of individual transit providers in the Malta and Phillips County area who have transitioned into a local bus service that provides centralized and coordinated service to existing and new clients and other individuals with basic transportation needs. We are a demand response and serve the area M-F 7:30am to 4:30pm. We were established on May 2, 2006.

**Title VI Program Requirements**

**Public Notice**

Phillips Transit Authority posts the Public Notice of Title VI Program Rights (below) in the following locations: public areas of the transits office and on the transit vehicles.

**Public Notice of Title VI Program Rights**

The Phillips Transit Authority gives public notice of its policy to uphold and assure full compliance with the non-discrimination requirements of Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities. Title VI and related nondiscrimination authorities stipulate that no person in the United States of America shall, on the ground of race, color, national origin, sex, age, disability, income level or limited English proficiency be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Any person who desires more information regarding MDT’s Title VI Program can contact Laura Pankratz at the address noted below.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, national origin, sex, age, disability, income level or limited English proficiency, has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to:

Laura Pankratz

PHILLIPS TRANSIT AUTHORITY

810 S 3rd St E Malta MT 59538

406-654-5301

phillipstransit@itstriangle.com

A complainant may file a complaint directly with the Federal Transit Administration at the following address:

Office of Civil Rights

Federal Transit Administration

Attention: Title VI Program Coordinator

East Building, 5th Floor – TCR

1200 New Jersey Ave SE

Washington, DC 20590

If information is needed in another language, please contact MDT’s Office of Civil Rights at 406-444-6334.

**Complaints**

The following procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987:

Any person who believes they, or any specific class of persons, were subjected to prohibited discrimination based on race, color or national origin may file a written complaint individually or through a representative. A complaint must be filed no later than 180 days after the date of the alleged discrimination, unless the discrimination is ongoing, or the time for filing is extended by the FTA.

PHILLIPS TRANSIT AUTHORITY has adopted MDT’s complaint form, which is located on our website: [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_] and hard copies in the transit facility and on the vehicles.

Complaints alleging violations of Title VI by PHILLIPS TRANSIT AUTHORITY may be filed in writing with the following agencies:

PHILLIPS TRANSIT AUTHORITY

810 S 3rd St E Malta MT 59538

406-654-5301

phillipstransit@itstriangle.com

Montana Department of Transportation

Office of Civil Rights

2701 Prospect Ave

PO Box 201001

Helena, Montana 59601

Phone: 406-444-6334

TTY: 800-335-7592

Fax: 406-444-7243

Email: mdtcrform@mt.gov

Office of Civil Rights

US Department of Transportation

Federal Transit Administration

1200 New Jersey Ave SE

Washington DC 20590

If information is needed in another language, please contact MDT’s Office of Civil Rights at 406-444-6334.

PHILLIPS TRANSIT AUTHORITY adopts MDT’s complaint processing procedures, which are consistent with FTA’s *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. Additional information can be found in MDT’s Title VI Plan and FTA’s website: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>.

**Complaint Log**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Investigation (I), Lawsuit (L), or Complaint (C)** | **Date Filed** | **Basis of Complaint (Race, Color, National Origin or Disability)** | **Summary of Allegation** | **Status** | **Action(s) Taken** | **Final Findings** |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

PHILLIPS TRANSIT AUTHORITY tracks civil rights complaints in the following table and submits to MDT Office of Civil Rights on an annual basis.

For the period 10/01/2020 to 09/30/2027 there were 0 Title VI complaints filed against PHILLIPS TRANSIT AUTHORITY.

**Public Participation Plan**

PHILLIPS TRANSIT AUTHORITY engages the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

As an agency receiving federal financial assistance, PHILLIPS TRANSIT AUTHROITY made the following community outreach efforts and activities to engage minority, Limited English Proficient populations, or other traditionally underserved populations since the last Title VI Plan submittal to MDT Office of Civil Rights.

*Published Public notice in local newspaper on 1/10 and 1/17/24 for operating assistance and handed out several surveys in and around Phillips County in February 2024 and attended Council on Aging meeting on Feb 14, 2024.*

**Language Assistance Plan**

PHILLIPS TRANSIT AUTHORITY adopts MDT’s Language Assistance Plan: [mdt.mt.gov/other/webdata/external/civilrights/limited\_english\_proficiency\_plan.pdf](https://www.mdt.mt.gov/other/webdata/external/civilrights/limited_english_proficiency_plan.pdf)

Montana’s demographic makeup does not meet the Federal threshold that requires mandatory written translation in any language, but PHILLIPS TRANSIT AUTHORITY has resources available to provide language assistance if needed. MDT provides the Language Identification and Assistance Guide to transit providers, which gives guidance for how to provide interpretation services when interacting with LEP individuals.

[mdt.mt.gov/other/webdata/external/civilrights/Language-Assistance-Guide.pdf](https://www.mdt.mt.gov/other/webdata/external/civilrights/Language-Assistance-Guide.pdf)

PHILLIPS TRANSIT AUTHORITY evaluates its ridership and populations within its service area and will coordinate with MDT Office of Civil Rights if the frequency of interactions with LEP individuals would require written translation.

**Transit Committee**

PHILLIPS TRANSIT AUTHORITY does have a transit-related, non-elected Board The racial breakdown of membership on the [board, committee, advisory council, etc.] is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Body** | **African American/ Black** | **American Indian/****Alaskan Native** | **Native Hawaiian/ Other Pacific Islander** | **Asian** | **Hispanic/ Latino** | **White** |
| **PHILLIPS TRANSIT AUTHORITY board** | **0**% | **11.11%** | **0%** | **0%** | **0%** | **88.88**% |

PHILLIPS TRANSIT AUTHORITY takes the following efforts made to encourage participation of minorities or other traditionally underserved populations:

*N/A*

**Equity Analysis**

A transit provider planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may be impacted by the siting of the facility. MDT Office of Civil Rights will conduct a Title VI equity analysis to compare various siting alternatives prior to selection of the preferred site.

PHILLIPS TRANSIT AUTHORITY Agency’s Title VI equity analysis is located in Attachment \_A\_.]

**System-wide Service Standards and Policies**

Based on size of transit providers and population, none of MDT subrecipients meet the additional requirements for fixed route transit providers. However, all transit providers that operate fixed route service must have system-wide standards and policies N/A we are a demand response system.