

RESOLUTION NO. R24-48

A RESOLUTION OF THE CITY COUNCIL APPROVING THE MONTANA
DEPARTMENT OF TRANSPORTATION TITLE VI PLAN FOR THE CITY OF
LAUREL TRANSIT.

BE IT RESOLVED by the City Council of the City of Laurel, Montana,

Section 1: Approval. The Montana Department of Transportation Title VI Plan for the City of Laurel Transit (hereinafter "MDT Title VI Plan"), a copy attached hereto and incorporated herein, is hereby approved.

Section 2: Execution. The Mayor is hereby given authority to execute the MDT Title VI Plan on behalf of the City.

Introduced at a regular meeting of the City Council on the 25th day of June, 2024, by Council Member Mize.

PASSED and APPROVED by the City Council of the City of Laurel the 25th day of June, 2024.

APPROVED by the Mayor the 25th day of June, 2024.



CITY OF LAUREL

Heidi Sparks for
Dave Waggoner, Mayor

ATTEST:

Kelly Strecker
Kelly Strecker, Clerk-Treasurer

APPROVED AS TO FORM:

Michel B.
Michele L. Braukmann, Civil City Attorney



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

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: City of Laurel Transit System

TITLE VI PLAN

Year: 2024

Title VI Contact Name: Kelly Strecker

Title VI Contact Phone: 406-628-7431 ex. 5100

Title VI Contact Email: kstrecker@laurel.mt.gov

Introduction to Agency

The Laurel Transit System operates in the city limits of Laurel Montana. They are a curb to curb on demand service. The Laurel Transit operates Monday through Friday from 10 a.m. to 4 p.m. We also have service to Billings Montana every Tuesday with morning and afternoon rides. The Laurel Transit is ADA compliant and services all ages. We have been in service since 2009. The Laurel Transit has two dedicated bus drivers and one substitute along with one dispatcher. The Laurel Transit has an advisory committee with 5 members and a local governing body that consists of eight council members and a Mayor.

Title VI Program Requirements

Public Notice

Laurel Transit posts the Public Notice of Title VI Program Rights (below) in the following locations: A copy of the notice is given to each passenger that rides the bus. It is posted in transit vehicles, online/website at www.cityoflaurelmontana.com, and office/reception areas as well as in our Laurel Transit brochure.

Public Notice of Title VI Program Rights

The Laurel Transit 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 Kelly Strecker 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:

Kelly Strecker
Laurel Transit
115 W 1st ST
Laurel, MT 59044
406-628-7431 ex 5100
kstrecker@laurel.mt.gov

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.

Laurel Transit has adopted MDT's complaint form, which is located on our website: www.cityoflaurelmontanta.com and hard copies in the transit bus, City of Laurel Office

Complaints alleging violations of Title VI by Laurel Transit may be filed in writing with the following agencies:

Laurel Transit
 115 W 1st ST
 406-628-7431 ex.5100
 kstrecker@laurel.mt.gov

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.

Laurel Transit 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: cityoflaurelmontana.com and FTA's website: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>.

Complaint Log

Laurel Transit tracks civil rights complaints in the following table and submits them to

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

MDT Office of Civil Rights on an annual basis.

For the period October 1, 2020 to September 30, 2023. There were 0 Title VI complaints filed against Laurel Transit.

Public Participation Plan

Laurel Transit 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 Laurel Transit 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.

An ad is posted weekly in our local newspaper, the Laurel Outlook. We also have it posted on our City Website at cityoflaurelmontana.com Six times a year a public notice goes in the Prime Connections newsletter and that reaches almost 9,000 subscribers. Our bus drivers visited local rest homes and Senior Living Centers.

Language Assistance Plan

Laurel Transit adopts MDT's Language Assistance Plan:

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 Laurel Transit 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

Laurel Transit 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

Laurel Transit has a transit-related, non-elected advisory council. The racial breakdown of membership on the advisory council is as follows:

Body	African American / Black	American Indian/ Alaskan Native	Native Hawaiian/ Other Pacific Islander	Asian	Hispanic / Latino	White
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City of Laurel Population- 7222	.5%	2%	0%	1%	5%	89%
Laurel Transit Advisory Committee						100%

Laurel Transit takes the following efforts made to encourage participation of minorities or other traditionally underserved populations:

The City has requested membership from the Nursing Homes, Adult Resource Alliance of Yellowstone County, General Public and anyone that would be willing to participate.

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.

Laurel Transit did not develop new transit facilities covered by these requirements.

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. Laurel Transit is an on-demand service provider.