



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: **Reach, Inc**

TITLE VI PLAN

Year: 2024

Title VI Contact Name: Jacy Widhalm-Clark

Title VI Contact Phone: 406-587-1271

Title VI Contact Email: jwidhalm@reachinc.org

Introduction to Agency

Since 1974, Reach Inc., has meaningfully contributed to the lives of the adults with developmental disabilities whom we serve by providing options to thrive and grow as individuals. Reach's clients achieve independence through the delivery of safe and affordable housing, employment and job coaching, as well as all-access transportation.

Transportation remains a limiting factor for the 86 adults we serve. For those who live in our residences, staff provide the majority of their transportation needs. While there are other public transportation options in our area, they either do not cover the geography of our clients' home location, are not in operation for variable shifts, or are not affordable. Additionally, many of our clients who need transportation would not be able to navigate safely in the systems available without staff support. Each year, we average about 80,000 miles of rides.

Our organizational structure consists of a volunteer board of directors who oversee governance and operations. The Executive Director reports to the board, and she oversees a management team of direct service and operations professionals. Staff are organized into teams based on client needs and goals in the areas of living arrangements, employment, and transportation.

Title VI Program Requirements

Public Notice

Reach, Inc posts the Public Notice of Title VI Program Rights (below) in the following locations:

- Agency website: <https://www.reachinc.org/services>
- Agency vehicles funded by transportation dollars. Available upon request.

- Work Center 322 Gallatin Park Dr, Bozeman, MT 59715. Available upon request.
- Agency-owned residences: Staff office. Available upon request.

Public Notice of Title VI Program Rights

Reach, Inc. 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 Jacy Widhalm-Clark 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:

Jacy Widhalm-Clark
Reach, Inc
322 Gallatin Park Dr, Bozeman, MT 59715
406-587-1271
jwidhalm@reachinc.org

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.

Reach, Inc has adopted MDT's complaint form, which is located on our website: <https://www.mdt.mt.gov/other/webdata/external/civilrights/FORMS/CIVIL-RIGHTS-DISCRIMINATION-COMPLAINT-FORM.PDF>

and hard copies in the:

- Agency vehicles funded by transportation dollars. Available upon request.
- Work Center 322 Gallatin Park Dr, Bozeman, MT 59715. Available upon request.
- Agency-owned residences: Staff office. Available upon request.

Complaints alleging violations of Title VI by Reach, Inc may be filed in writing with the following agencies:

Reach, Inc
322 Gallatin Park Dr, Bozeman, MT 59715
406-587-1271
jwidhalm@reachinc.org

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.

Reach, Inc 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

Reach, Inc tracks civil rights complaints in the following table and submits to MDT Office of Civil Rights on an annual basis.

For the period October 1, 2020 through September 30, 2023 there were 0 Title VI complaints filed against Reach, Inc.

Public Participation Plan

Not applicable.

~~Reach, Inc. 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, [Agency] 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.

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

Language Assistance Plan

Reach, Inc. 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 Reach, Inc. 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

Not applicable.

~~[Agency] 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

Reach, Inc does not have a transit-related, non-elected board, committee, advisory council, etc. The racial breakdown of membership on the [board, committee, advisory council, etc.] is as follows:

Not applicable.

Body	African American / Black	American Indian/ Alaskan Native	Native Hawaiian/ Other Pacific Islander	Asian	Hispanic / Latino	White
[Service Area – indicate city or counties included] Population						

[Agency] takes the following efforts made to encourage participation of minorities or other traditionally underserved populations:

Not applicable.

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.

Reach, Inc. 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.

Not fixed route.