

TITLE VI PLAN

ASSOCIATED STUDENTS OF THE UNIVERSITY OF MONTANA TRANSPORTATION and UDASH



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INTRODUCTION

ASUM Transportation is a transit agency created and operated by the Associated Students of the University of Montana (ASUM).

ASUM Transportation operates fixed-route bus service, known as UDASH, during the academic year of the University of Montana, specifically each day that classes are held during the Spring and Fall semesters. UDASH serves as a capacity overlay for the Missoula Urban Transportation District's (MUTD) Mountain Line service area.

UDASH bus service is fare free and open to the general public.

The University of Montana - ASUM Transportation is a subrecipient of federal transit funding for capital projects, of which the Missoula Urban Transportation District (MUTD) is the recipient.

Notifying the Public of Rights Under Title VI

ASUM Transportation operates its programs and transit services, known as UDASH, without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with ASUM Transportation.

For more information on ASUM Transportation's civil rights program, and the procedures to file a complaint, contact 406-243-4599; email ASUMTransportation@mso.umt.edu; or visit our administrative office on the University of Montana Campus in Room 115 of the University Center. For more information, visit <https://www.umt.edu/transportation/contact-us/default.php>

A complainant may file directly with the Federal Transit Administration (FTA) by filing a complaint with the Office of Civil Rights, 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 406-243-4599.

Notificación al público de los derechos bajo el Título VI

ASUM Transportation opera sus programas y servicios, conocidos como UDASH, sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante ASUM Transportation.

Para obtener más información sobre el programa de derechos civiles de ASUM Transportation y los procedimientos para presentar una queja, comuníquese al 406-243-4599; envíe un correo electrónico a ASUMTransportation@mso.umt.edu; o visite nuestra oficina administrativa en el Campus de la Universidad de Montana en la Sala 115 del Centro Universitario. Para obtener más información, visite <https://www.umt.edu/transportation/contact-us/default.php>

Un denunciante puede presentar una queja directamente ante la Administración Federal de Tránsito (FTA, por sus siglas en inglés) mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI, Edificio Este, 5.º Piso-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si necesita información en otro idioma, comuníquese al 406-243-4599.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by ASUM Transportation may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: <https://www.umt.edu/transportation/contact-us/default.php> or requested at: University Center, Room 115, 32 Campus Dr, Missoula, MT 59812.

ASUM Transportation investigates complaints received no more than 180 days after the alleged incident. ASUM Transportation will process complaints that are complete.

Once the complaint is received, ASUM Transportation will review it to determine if our office has jurisdiction.

ASUM Transportation has 14 days to investigate the complaint. If more information is needed to resolve the case, ASUM Transportation may contact the complainant. The complainant has 14 business days from the date of the request to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 14 business days, ASUM Transportation can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

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

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, 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 406-243-4599.

Si necesita información en otro idioma, comuníquese al 406-243-4599.

Title VI Complaint Form

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Requirements?	Format	Large Print		Audio Tape	
		TDD		Other	
Section II:					
Are you filing this complaint on your own behalf?			Yes*	No	
*If you answered "yes" to this question, go to Section III.					
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:					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (Month, Day, Year): _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

You may attach any written materials or other information that you think is relevant to your complaint.
 Signature and date required below

Signature

Date

Language Assistance Plan

As a recipient of federal US DOT funding, ASUM Transportation is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons. Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

ASUM Transportation's Language Assistance Plan includes the following elements:

- The results of the Four Factor Analysis, including a description of the LEP population(s) served.
- A description of how language assistance services are provided by language.
- A description of how LEP persons are informed of the availability of language assistance services.
- A description of how the language assistance plan is monitored and updated.
- A description of how employees are trained to provide language assistance to LEP persons.

Four Factor Analysis

To determine if an individual is entitled to language assistance and what specific services are appropriate, ASUM Transportation has conducted a Four Factor Analysis of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1) The number or proportion of LEP persons eligible to be served or likely to be encountered.

Staff reviewed the Interagency Working Group on Limited English Proficiency's 2015 Language Map data through www.lep.gov and determined that Missoula County includes a total number of 1390 LEP persons which compromised a total of 1.33% of the county population.

Information from the Interagency Working Group on Limited English Proficiency's 2015 Language Map revealed the languages spoken by those with LEP. The four most commonly spoken languages among individuals with LEP were Spanish (281 individuals), Japanese (177), Tagalog (177), and Chinese (159).

UDASH's service area is limited to the University of Montana Campus and select areas within the city of Missoula, the population of which comprises approximately 60% of Missoula County. ASUM Transportation infers that the total number of LEP individuals within its service area is less than 1000. Because UDASH's services are free and open to the public, all of these individuals are eligible to be served. The total number of these individuals likely to use UDASH's

services is unknown, but it is presumably a fraction of the total number of eligible persons.

Factor 2) The frequency with which LEP persons come into contact with the program:

UDASH infrequently comes into contact with LEP persons. UDASH's primary mode of contact with the community is through ridership. In the academic year 2022-2023, UDASH provided approximately 119,000 rides. As a fare-free system open to the public, UDASH does not acquire or maintain biographical data regarding unique riders, but based on the above LEP data, UDASH estimates it provides fewer than 200 rides annually to individuals with LEP.

Factor 3) The nature and importance of the program, activity, or service provided by the program to people's lives.

UDASH provides a vital service to the University of Montana and Missoula community. Many students, faculty, and other riders are without personal vehicles. UDASH helps to ensure that these and other individuals are able to reliably and efficiently commute to work, school, and other destinations. During the winter months, UDASH is essential to keep students, faculty, and other riders safe in poor weather conditions.

Factor 4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Given the small size of UDASH's riders that are LEP persons, UDASH does not provide translation of all of its documents. However, UDASH does provide its notice to the public in the most common language utilized by LEP persons in the service area, Spanish. Additionally, UDASH will assist non-Spanish speaking LEP persons by connecting with an appropriate translation service at no cost to the LEP individual.

LANGUAGE ASSISTANCE

ASUM Transportation is committed to ensuring all LEP persons receive any language assistance necessary to ensure full access to ASUM Transportation's services, including Title VI policies and procedures. ASUM Transportation's Title VI policy statement will be posted in both English and Spanish in its buses and offices. LEP persons who require translation into another language will be directed to contact the ASUM Transportation office for oral translation services, which will be obtained either through University of Montana staff/faculty, or via a telephonic translation service.

MONITORING

ASUM Transportation will monitor and update the LEP plan annually. At minimum, ASUM Transportation will update its LEP plan if it becomes clear that higher concentrations of LEP persons are utilizing UDASH's services.

DISSEMINATION OF THE LEP PLAN

ASUM Transportation plans on disseminating the LEP plan by informing LEP persons of the LEP plan and how to access language services on its website found here: udash.org

List of Transit Related Title VI Investigations, Complaints and Lawsuits

ASUM Transportation has never previously been the subject of a Title VI investigation, complaint, or lawsuit. Going forward, ASUM Transportation will maintain a list of all Title VI investigations, complaints, and lawsuits pertaining to its transit-related activities. If new investigations, complaints and/or lawsuits do arise, ASUM Transportation will document them in its next plan submission.

Public Participation Plan

The purpose of ASUM Transportation's Public Participation Plan is to provide all UDASH riders and staffers the opportunity to participate and be involved in ASUM Transportation's program efforts and decision-making processes.

Currently, there is no transit-related, non-elected planning board, advisory council or committee, or similar committee with membership selected by ASUM Transportation. Therefore, we cannot provide a table depicting the racial breakdown of said membership as referred to in Title 49 CFR Section 21.5(b)(1)(vii).

Although ASUM Transportation does not conduct any public meetings, the Associated Students of the University of Montana (ASUM) hold Senate meetings every Wednesday at 6:00PM during the Fall and Spring semesters. ASUM's meetings are open to the public and open for participants to comment on UDASH's service and policies. The public can also contact ASUM Transportation through our website at <https://www.umt.edu/transportation/contact-us/default.php>, Facebook, Instagram, as well as calling or coming into our office.

Additionally, ASUM Transportation's Title VI program information will be online for the public to read, Title VI notices will be posted on UDASH vehicles, and UDASH employees will receive training on Title VI procedures.

Fixed-Route Service Standards for ASUM Transportation

ASUM Transportation operates fixed-route bus service, known as UDASH, during the academic year of the University of Montana, specifically each day that classes are held during the Spring and Fall semesters. The following standards have been set to provide quantitative benchmarks for UDASH service and to set service planning objectives, effective June 2023.

Vehicle Load

The maximum passenger load shall never exceed the vehicle manufacturer's stated capacity, which varies on the different models and lengths of vehicles in the UDASH fleet. This standard applies to both peak and off-peak times of service. ASUM Transportation tracks the frequency and numbers of passengers unable to board due to maximum vehicle load occurring, and will evaluate increasing capacity for routes that have regular occurrences of runs at maximum capacity and/or passengers left behind.

Vehicle Headway

Vehicle headway, or the amount of time between two vehicles traveling in the same direction on a given route, shall not exceed 30 minutes for all UDASH service routes. Ideal headway on all routes will fall between 15-20 minutes. ASUM Transportation will evaluate reducing headway time for routes that have regular occurrences of runs at maximum capacity.

On-Time Performance

Runs completed as scheduled for UDASH service will be defined as those runs that are no more 10 minutes late for routes with 30-minute service frequency, or no more than 5 minutes late for routes with 15- or 20-minute service frequency. It is ASUM Transportation's policy that buses will never depart designated time points early. A standard of a minimum of 90% of runs for each UDASH route must be completed within the above windows to meet system-wide on-time performance goals.

Service Availability Standards

UDASH serves as a capacity overlay for the Missoula Urban Transportation District's (MUTD) Mountain Line service area. Therefore, the UDASH service area is currently defined as areas in Missoula County with significant concentrations of enrolled students at the University of Montana as residents. UDASH routes shall be distributed in such a manner that any resident will have either have access to free park and ride lots on the route, or be within a quarter mile walking distance of a bus stop. This distribution is assessed annually using student enrollment data.