



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:

Title VI Contact Name: Darren R Brugmann
Title VI Contact Phone: 406-209-2009
Title VI Contact Email: dbrugmann@bigskytd.com

Introduction to Agency

Big Sky Transportation District Overview and History

The Big Sky Transportation District (BSTD) was formed in 1991, beginning with the Snow Express transit system, which operated from roughly mid-December to mid-April to move skiers, other visitors, and employees around Big Sky. In 2002, the Western Transportation Institute (WTI) at Montana State University began working with the District to assess services, including routes and schedules. This partnership led to the District securing funds from the Montana Department of Transportation (MDT) to establish a Transit Development Plan (TDP), marking the first step in establishing a year-round public transportation system.

Following the completion of the TDP, WTI worked alongside the District to prepare an application for Federal Transit Administration Section 5311 Funds. Managed by MDT, these funds were the final step in creating a year-round transit service in Big Sky, with the addition of a connection between Big Sky and Bozeman, while further expanding throughout Gallatin Canyon. Meanwhile, the Link service extended to cover several locations in Bozeman, including MSU, Walmart, Four Corners, and Gallatin Gateway.

In October 2006, the District received confirmation of funding to fully operate the system and in December 2006, the service was rebranded as Skyline. From then the system became a year-round public transportation system, which not only provided service within Big Sky, but also provided service between Big Sky and Bozeman with what is still referred to as "the Link." In January 2023 the system introduced microtransit on-demand option for travel in the local Big Sky Town Center and Meadowview areas. The system serves over 80,000 people across the region and provided nearly 270,00 rides across all its services in fiscal year 2024.

Organizational Structure and Board

Established through a voter referendum on November 18, 1991, and governed by §§7-14-201 through 7-14-246, MCA, this district operates with a three-member board (now five), selected by County Commissioners for staggered terms. The board's responsibility is to create, manage, enhance, uphold, and oversee the operations of the district.

The Big Sky Transportation District Board is appointed jointly by the Gallatin and Madison County Commissioners. These board members have authority over all aspects of the Skyline service, encompassing financial planning and route decisions. A distinctive aspect of Skyline is that it's a public transportation service is located within an unincorporated region of the state. As Big Sky lacks incorporation, its services fall under the purview of Gallatin County, Madison County, or various existing Districts in the area, such as the Big Sky Resort Area District (responsible for the local option sales tax or "resort tax").

Title VI Program Requirements

Public Notice

Big Sky Transportation District posts the Public Notice of Title VI Program Rights (below) in the following locations: Skyline website at the following link:

[Documents – Skyline Bus](#)

And in public areas of transit service provider(s) public areas. This notice shall also be posted at stations, stops and on revenue transit vehicles.

Public Notice of Title VI Program Rights

The Big Sky Transportation District 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 Executive Director 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:

Executive Director
Big Sky Transportation District
Skyline Transit
PO Box 161104, Big Sky, MT 59716
406-209-2009
info@skylinebus.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.

The Big Sky Transportation District has adopted MDT's complaint form, which is located on our website:

[Documents – Skyline Bus](#)

Complaints alleging violations of Title VI by the Big Sky Transportation District may be filed in writing with the following agencies:

Big Sky Transportation District
Skyline Transit
PO Box 161104, Big Sky, MT 59716
406-995-6287
info@skylinebus.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.

Big Sky Transportation District 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: [Documents – Skyline Bus](#) and FTA’s website: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/filecomplaint-fta>.

Complaint Log

Big Sky Transportation District tracks civil rights complaints in the following table and submits to MDT Office of Civil Rights on an annual basis.

For the period **July 1, 2023** to **June 30, 2024** there were **0** Title VI complaints filed against Big Sky Transportation District.

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

Public Participation Plan

The Big Sky Transportation District 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, Big Sky Transportation District 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.

Advertise meeting dates on our website and send emails to the Coordinated Council of Big Sky (CCBS) members. While the District tries to maximize the participation of minorities, there are not designated groups in Big Sky, Bozeman, Gallatin County or Madison County.

The Board meets every 3rd Thursday of each month. A scheduled agenda item allows for any public comment that is not expressly part of that respective agenda. CCBS meets on the 4th Thursday of each month, of which BSTD is an active participant.

Language Assistance Plan

Big Sky Transportation District 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 Big Sky Transportation District may have resources available to provide language assistance if needed. Please contact for further assistance.

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

Big Sky Transportation District can evaluate 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 Board/Committee

Big Sky Transportation District has a transit-related, non-elected Board of Directors. The racial breakdown of membership on the board is as follows:

Body		African American / Black	American Indian/ Alaskan Native	Native Hawaiian/ Other Pacific Islander	Asian	Hispanic / Latino	White
Board of Directors Gallatin and Madison County							
Gallatin County – 3 Members		0 %	0 %	0 %	0 %	0 %	100 %
Madison County – 2 Members		0 %	0 %	0 %	0 %	0 %	100 %

BSTD makes the following efforts to encourage participation of minorities or other traditionally underserved populations:

Worth noting is that Big Sky does not yet have some of the typical agencies or organizations found in other small towns, such as human services-type agencies, senior centers, etc. Therefore, BSTD’s service

coordination efforts generally involve major employers and traffic contributors like Big Sky Resort, Moonlight Basin, Spanish Peaks Resort, Yellowstone Club, alongside private transportation companies like Karst Stage, Big Sky Shuttle, Shuttle to Big Sky & Taxi, rather than the typical interdepartmental procedures used by many other transit providers. Moving forward, all coordination possibilities are analyzed in context of the FTA charter regulations, and other relevant laws and regulations.

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.

Big Sky Transportation 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.

Big Sky Transportation District posts Code of Conduct at the following link on their website:

[Bus Rules – Skyline Bus](#)