



Benton County Special and Rural Transportation

TITLE VI PLAN UPDATE

October, 2017



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Introduction

This is a required update to the Benton County Title VI Plan which was adopted on August 19, 2014. In Accordance with Title VI of the Civil Rights Act of 1964, the Benton County Special and Rural Transportation Program is committed to ensuring that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by the Benton County Special and Rural Transportation Program (BCSRT).

Additionally, although not statutorily required under federal Title VI, Benton County is committed to ensuring that principles of health and social equity are reflected and incorporated in all public transportation planning and decision-making activities.

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Benton County Title VI Policy

BCSRT will ensure that its transportation services, policies, and activities will comply with the Department of Transportation's (DOT) Title VI regulations. Benton County is committed to developing and maintaining transit services that are free from any form of discrimination.

BCSRT will maintain its procedures, and where necessary perform corrective actions, to ensure the equal protection, treatment, and representation of all persons without discrimination including, but not limited to age, citizenship status, race, ethnicity, marital or familial status, gender identity or expression, mental disability, national origin, physical disability, religion, religious observance, sexual orientation, and source or level of income.

BCSRT will do the following:

Ensure Non-discrimination as an operating principle. No person, on the basis of age, citizenship status, race, ethnicity, marital or familial status, gender identity or expression, mental disability, national origin, physical disability, religion, religious observance, sexual orientation, and source or level of income, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

Commitment to Health and Social Equity in Transportation Services. Healthy People 2020 defines *health equity* as the "attainment of the highest level of health for all people. Achieving health equity requires valuing everyone equally with focused and ongoing societal efforts to address avoidable inequalities, historical and contemporary injustices, and the elimination of health and health care disparities." Healthy People 2020 also defines a *health disparity* as "a particular type of health difference that is closely linked with social, economic, and/or environmental disadvantage. Health disparities adversely affect groups of people who have systematically experienced greater obstacles to health based on their racial or ethnic group; religion; socioeconomic status; gender; age; mental health; cognitive, sensory, or physical disability; sexual orientation or gender identity; geographic location; or other characteristics historically linked to discrimination or exclusion."

Access to adequate public transportation has been clearly documented as a key determinant of positive public and social health. Benton County is committed to ensuring that the principles of good public health policy, including broad accessibility and the avoidance or mitigation of disparities and obstacles to equity wherever and whenever possible, shall be reflected in public transportation operational plans, project goals, and transit activities, policies and procedures.

Provide an annual Title VI certification and assurance. As a condition of receiving Federal and State financial assistance and in accordance with 49 CFR Section 21.7, BCSRT will submit its Title VI Assurance, as part of its annual Certification and Assurance submission to ODOT.

Notify beneficiaries of protection under Title VI. In accordance with 49 CFR Section 21.9(d) BCSRT will provide information to the public regarding its Title VI obligations and apprise

members of the public of the protections against discrimination afforded to them by Title VI. These Title VI obligations and protections will be posted on the agency website; on a poster at noted locations; and through other communications methods used by the agency.

Maintain a Local Title VI Complaint Procedure. In accordance with 49 CFR Section 21.9(b), BCSRT will develop and maintain procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request. The BCSRT contractor will provide a complaint form upon request and forward those forms to the Title VI Complaint Coordinator (Special and Rural Transportation Coordinator) for resolution.

Recourse to Federal Title VI Enforcement. BCSRT will make it known to the public that those persons or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

Record Title VI Investigations, Complaints and Lawsuits. In accordance with 49 CFR Section 21.9(b), BCSRT will prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the recipient that allege discrimination on the basis of race, color, or national origin. This list will include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); and the status of the investigation, lawsuit, or complaint.

Provide Access to Limited English Proficient Persons. Benton County, as well as the City of Corvallis, each has a process to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). BCSRT will utilize these processes to assist persons with limited English proficiency to participate in the transportation planning and utilization process. BCSRT staff will make every effort to provide interpreters and document translations, where feasible, upon request.

Prepare and Submit a Title VI Program Plan. To ensure compliance with 49 CFR Section 21.9(b), BCSRT will document their compliance with this chapter by submitting a Title VI Program to the FTA's regional civil rights officer once every three years. This document is that plan.

Public Participation. BCSRT will consider, and will make a reasonable effort seek out, the viewpoints of racial minority, low-income, and LEP populations in the course of conducting public outreach and activities regarding proposed transportation decisions.

Responsibilities. Employees and contractors of BCSRT will follow the intent of these guidelines in a manner that reflects agency policy.

- Ensure that required Title VI documents are submitted to ODOT on a timely basis, including annual Certifications and Assurances, as well as triennial Title VI plans.
- Ensure that Title VI non-discrimination notices are posted in public locations as well as on

the BCSRT website, and are included in appropriate public documents.

- Attend Title VI trainings when provided by ODOT or by FTA, and review new documents and guidance when publically issued.

Title VI Notice to the Public

The BCSRT Title VI Notice to the Public in both English and Spanish is posted at the following locations. A copy of the Title VI Policy Statement and the public notices can be found as **Attachment A**.

- Benton County Public Transit website, Title VI webpage:
<https://www.co.benton.or.us/publicworks/page/title-vi-non-discrimination-program>
- City of Corvallis Transportation Program Office, Public Works Department
- Benton County Board of Commissioners Office
- On board buses operated by BCSRT

Additionally, the entire Benton County Title VI Plan is presently being translated into Spanish language

Title VI Complaint Procedures

BCSRT's Special and Rural Transportation Coordinator is the local Title VI compliance coordinator. BCSRT has a standard process for investigating all complaints. Members of the public may file a signed, written complaint up to one hundred eighty (180) days from the date of alleged discrimination. A copy of the BCSRT Title VI Complaint Form can be found as **Attachment B**.

The procedure for filing a Title VI civil rights complaint and the process for responding to such a complaint is as follows:

- 1) Any individual, group of individuals or entity that believes that they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.
- 2) Complaints may be submitted to BCSRT staff or representatives, or the BCSRT contractor via telephone, in person, in writing, or via email. Complainants will eventually be directed to submit a standard BCSRT complaint form. Persons with limited English proficiency can be assisted by a third party to complete the form. Complaints made through the BCSRT contractor will be forwarded to the BCSRT Coordinator.
- 3) The BCSRT Coordinator shall make a determination within 10 working days as to whether the complaint is a Title VI complaint. The basis of the determination may be apparent in the complaint as submitted, or require follow-up with the complainant.

- 4) If the complaint is a Title VI complaint, the Coordinator will investigate and determine the disposition of the complaint. The Coordinator will also report the filing of the complaint to his/her immediate superior. The formal investigation of the complaint will be confidential and will include but is not limited to:
 - a. Date, time, location and specific circumstances of the alleged incident
 - b. Interviews with witnesses, if any
 - c. Interviews with the person against whom the complaint was made, as applicable

- 5) Within 30 days of the determination, the Coordinator will report a summary of findings and resolution of the complaint in writing, including the proposed disposition of the matter, and will provide a copy to the complainant, and keep a copy on file for a minimum of three years. The notification will advise the complainant of his/her appeal rights with ODOT, and/or FTA, if they are dissatisfied with the final decision rendered by BCSRT. The Coordinator will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.

The resolution of the complaint will be completed within one of the following:

EXONERATED – The investigation confirmed that the alleged behavior did occur, but that it was consistent with County policy.

UNFOUNDED – The investigation demonstrated that the alleged actions did not occur.

UNSUBSTANTIATED – The investigation did not present sufficient evidence to clearly prove or disprove the allegations.

SUSTAINED – The investigation does disclose sufficient evidence to clearly prove the allegations.

- 6) Complaints which are found to be sustained will be acted upon directly by the BCSRT Coordinator, using methods or resources appropriate to resolution of the incident and consistent with the severity of the causal action. This may include appropriate contractual remedies with the BCSRT contractor. If the complaint involves any actions of the BCSRT Coordinator, even if inadvertent or only in part, the issue will be referred to the BCSRT Coordinator's supervisor for determination of appropriate follow-up.

- 7) Appeals to BCSRT determinations may be made to the Benton County Public Works Director's Office. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints to the lowest lever possible. The option of informal mediation meetings(s) between the affected parties and BCSRT may be utilized for resolution.

- 8) If the Complainant is dissatisfied with the Agency's resolution of the complaint, he/she has the right to file a complaint with either ODOT or directly with FTA, or both, at the addresses below:

Oregon Department of Transportation
Office of Civil Rights
Attn: Intermodal Civil Rights Manager
355 Capitol Street, NE
Salem, OR 97301
503.986.3169

Federal Transit Administration, Region 10
Attn: Civil Rights Officer
Jackson Federal Building
915 Second Avenue Suite 3142
Seattle, WA 98174-1002
Phone 206-220-7954 Fax 206-220-7959

FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov.
These procedures are also outlined in FTA Circular 4702.1A. Chapter IX.

Record of Title VI investigations, Complaints, or Lawsuits

BCSRT is required to maintain a list of any and all transit related Title VI investigations, complaints, and lawsuits. The list is kept and maintained at the BCSRT administrative office located at 1245 NE Third Street, Corvallis OR 97330.

For purposes of this Title VI plan update, BCSRT hereby certifies that:

- a. During the last three (3) years since adoption of the 2014 Title VI Plan until now, there have not been any and there are not now any outstanding civil rights lawsuits or complaints naming BCSRT which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
- b. During the last three (3) years since adoption of the 2014 Title VI Plan until now, there have not been any civil rights compliance review activities conducted with respect to BCSRT and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to BCSRT.
- c. There are currently no in-progress or pending BCSRT service changes, or facility or construction projects, which would negatively impact low-income or minority communities.

Racial Minority Representation on Advisory Boards

The BCSRT reports and takes direction on funding issues from the Benton County Special Transportation Advisory Committee (STAC), whose members are appointed by the Benton County Board of Commissioners. Members represent specific constituents and interests, as set forth in County code and STF statutes (ORS 391 and OAR Chapter 732.) Seniors and persons with disabilities, as well as system users are represented on the STAC. The table below depicts STAC member gender & ethnicity. Initials are used to ensure the privacy of members, who are volunteers and may not wish their personal information displayed in a public document.

STAC Member	Represents	Gender	Ethnicity
M.M.	Chair/Vol. Driver	Female	Caucasian
T.B	Trans. Provider	Male	Caucasian
S.H	Trans. Provider	Male	Caucasian
A.D	Disabled Svc User	Male	Caucasian
D.F.	Rec. of Trans Svc	Male	Caucasian
T.W.	Community Rep.	Male	Caucasian
D.Z.	Rec. of Trans Svc	Male	Caucasian
T.S.	Rec. of Trans Svc	Female	Caucasian
S.B.	Disabled Svc User	Male	Caucasian
R.M.	Health Rep.	Female	Hispanic/Latino

We have a representative from the Health Department attending STAC meetings who also represents and works with the Hispanic/Latino population in Benton County. Efforts have been made to recruit both more females and additional racial minority representatives. On two occasions, these efforts came almost to fruition but the candidates withdrew for personal reasons at the last moment. One additional individual from the Latino community has come forward to express interest in the STAC, and when a vacancy occurs we hope that she will consider membership. It continues to remain difficult to recruit volunteers for a sometimes time-consuming committee.

Additionally, BCSRT actively seeks participation and input from low-income and racial minority groups, by meeting with and making presentations about public transit services to them. BCSRT is a member of the Linn Benton Health Equity Alliance (HEA), and has made presentations to the HEA as well as the Linn Benton Hispanic Advisory Committee.

Additional transit-related advisory committees in Benton County that impact public transit decision-making include the Linn-Benton Loop Governing Board and it's Technical Advisory Committee (the Benton County Special Transportation Coordinator currently serves as chair of the Loop TAC); as well as the Northwest Connector Alliance, a five-County public transit alliance of which Benton County is a member through operation of the Coast to Valley Express service.

Public Participation Plan - Summary of Efforts and Outreach

The BCSRT takes guidance from the Corvallis Area Metropolitan Planning Organization's (CAMPO) adopted **Public Involvement Framework**, which is incorporated, in full, as **Attachment C** in this Title VI Plan Update. BCSRT strives to include minority, low-income, and LEP (Limited English Proficiency) individuals and their viewpoints in its decision making processes.

Since adoption of the Title VI Plan, following is a summary of the public participation outreach activities conducted by BCSRT:

Coordinated Plan

Work on Benton County's new Plan began in the Fall of 2015, led by ODOT's consultant for the project, Jim Owens of Cogen Owens Green. From the beginning, the Plan has encompassed a full-on public process:

- It has been a standing discussion item on the Special Transportation Advisory Committee (STAC) monthly agenda, with regular updates provided the STF Coordinator and by Mr. Owens.
- STF Coordinator Lee Lazaro has provided about a dozen formal public presentations to a wide variety of health and human services provider groups and civic organizations, discussing the Coordinated Plan and encouraged listeners to provide input.
- Between June 2015 to April 2017, the STAC conducted five community "open house" workshops to present data and gather public input at various key points of the planning process - attendance at each workshop varied from 10 to 25 individuals.
- There have been numerous County press releases accompanying each workshop.
- Consultants conducted over 50 in-depth interviews with identified stakeholders in the mid-Valley area for development of the Linn, Benton, and Lincoln Coordinated Plans. The results of all the public outreach efforts are summarized and incorporated throughout the chapters of the Coordinated Plan.

Two preliminary documents were developed and reviewed with the STAC in the course of drafting the final Plan; these included an analysis of Benton County Existing Services and Demographics, and a Benton County Needs Assessment which identified service gaps. These were completed and finalized during the period of February through June of 2016.

The final Coordinated Plan was adopted by the Benton County Board of Commissioners on August 1, 2017, and includes the following major sections:

- An overview of the Plan development process

- A thorough analysis of Benton County demographic profiles, with emphasis on the populations served by special transportation programs
- Service descriptions and ridership trends of current public transportation services within the County
- An review of regional public transportation and other regional services
- Coordination of transportation with emergency preparedness
- A summary of current and projected funding for County public transportation, as well as the funding challenges faced and strategies for dealing with these.

The report culminates in the final section, where Needs, Vision, Strategies, and Potential Actions are identified. Within this section are the following components:

- a) Previously identified Needs and Strategies from prior Coordinated Plan updates
- b) A review of progress achieved towards addressing the 2009-2012 Strategies
- c) Identification of current 2017 Needs, Strategies, and Actions

Additional Public Outreach

1. Membership on and participation by BCSRT on the Senior and Disability Services Council for Linn, Benton, and Lincoln counties.
2. Membership on and participation by BCSRT in Access Benton County, and organization representing and advocating for people with disabilities in Benton County.
3. Membership on and participation by BCSRT in the Linn-Benton Health Equity Alliance, a group representing some 200 partner agencies, which advocates for and promoted equality of access and justice in health care.
4. Membership on and participation by BCSRT in the Corvallis Sustainability Coalition's Transportation Action Team, a community-based transportation-focused group promoting active transportation for all.
5. Veteran's Outreach – Benton County is home to an estimated 5,329 veterans. BCSRT works with the Benton County Veterans Service Officer to make periodic presentations to the STAC regarding veteran's programming and special needs in the County, and in turn BCSRT seeks to find opportunities to outreach at veterans service events, and to offer special transportation services when possible to veterans and their families.

6. Through participation in the Linn-Benton-Lincoln Ride-Line Transportation Brokerage Advisory Committee, help oversee the provision of critical non-emergency medical transportation services to Medicaid and Oregon Health Plan clients.
7. Obtained a grant from the Linn-Benton Health Equity Alliance for acquiring a portable assistive hearing kit for group meetings, to use to assist people with hearing disability to hear and participate in public meetings – this is available for checkout by non-profit agencies in Benton and Linn Counties.
8. Audio recordings and minutes of every STAC meeting are made, and STAC agenda's and minutes are posted on the County website after each meeting.
9. Working with our County Press Information Officer, County press releases which have a wide e-distribution list to 300+ media and influential officials are used to communicate important BCSRT developments and announcements.
10. A new project is translating all of our service brochures into Spanish – these will be made available via paper brochures and also on the BCSRT website.
11. The Title VI Plan is also being translated into Spanish.
12. A draft Reasonable Access Policy was written and will be taken to the STAC and the Board of Commissioners for Adoption.

BCSRT Limited English Proficiency Plan

BCSRT has an adopted Limited English Proficiency Plan. A full copy of the outreach plan for individuals with limited English proficiency can be found in **Attachment D** of this Title VI Plan Update. Presently, work is being done to translate our five new service brochures into Spanish for the website and for in-person distribution and outreach.

Facility Statement

BCSRT has not constructed any facilities during the period since adoption of the 2014 Title VI Plan.

Title VI Service Standards

Vehicle Load for Each Mode Standard (expressed as a ratio)

The projected peak-hour vehicle load standards by mode for BCSRT are below. Vehicle Load Standards are expressed as a ratio. (A 40-foot bus that allows 12 standees would have a load standard of 1.3) BCSRT generally does not allow standees for safety reasons.

Commuter (24 passenger bus)	1.0
Paratransit (4 passenger van)	.2
Demand Response (12 passenger bus)	.8

Off-peak Hour Vehicle Load Standards by Mode

Commuter (24 passenger bus)	.7
Paratransit (4 passenger van)	.2
Demand Response (12 passenger bus)	.6

Vehicle Headway for Each Mode (Time between vehicles on same route)

Commuter (24 passenger bus)	2 hours (approx)
Paratransit (4 passenger van)	n/a
Demand Response (12 passenger bus)	n/a

On Time Performance for Each Mode

Mode	May Run Early (yes/no)	On-time Consideration
Demand Response	YES	(+or -) 15 minutes
Commuter	NO	<10 minutes behind
Paratransit	YES	(+or -) 10 minutes

Service Availability for Each Mode

BCSRT strives to provide equitable service availability to customers within the service area. We have set our service availability goals as follows:

Commuter (24 passenger bus)	80% of residents in the service area can transfer to our service by CTS or other transit, or reside within 2 miles of a park and ride
Paratransit (4 passenger van)	Service is provided equally throughout the CTS service area consistent with ADA route and schedule requirements
Demand Response (12-passenger bus)	Service is provided throughout Benton County and may require advance reservation

Vehicle Assignment for Each Mode

BCSRT sets a policy of vehicle assignment for each mode without regard to race, color, national origin, religion age, marital status, sexual orientation, or disability of users from that service area. BCSRT will assign vehicles with higher capacity to routes with higher ridership. Age of the vehicles will only be considered a factor when assigning vehicles to longer or more challenging routes.

ATTACHMENT A



***BENTON COUNTY PUBLIC WORKS DEPARTMENT
SPECIAL AND RURAL TRANSPORTATION PROGRAM***

**TITLE VI NON-DISCRIMINATION
POLICY STATEMENT**

August 20, 2014

Title VI of the Civil Rights Act of 1964 states:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Benton County Special and Rural Transportation program is committed to complying with the requirements of Title VI in all of its programs and activities.

Benton County’s non-discrimination policy is contained within Chapter 28 of the Benton County Code, a copy of which is included on the following pages.

Questions and complaints may be reported to Lee K. Lazaro, Special and Rural Transportation Coordinator, at 541-754-1748, or at lee.lazaro@corvallisoregon.gov . Appeals of Title VI complaint reviews may be directed to me, at 360 SW Avery Avenue, Corvallis OR 97333.

Josh Wheeler, P.E.
Director of Public Works



Benton County Special and Rural Transportation Program

**TITLE VI NON-
DISCRIMINATION
STATEMENT**

Benton County Special and Rural Transportation ensures compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, part 21; related statutes and regulations to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, sex, or national origin.

Any person who believes he or she has been discriminated against should contact:

Benton County Special and Rural Transportation
Lee Lazaro, Program Coordinator
PO Box 1083, Corvallis OR 97339-1083
TELEPHONE (541) 754-1748
Lee.Lazaro@corvallisoregon.gov



Condado de Benton Programa de Transporte Rural y Especial

**DECLARACION DE NO
DISCRIMINACION
SEGUN EL TITULO VI**

El Condado de Benton Programa de Transporte Rural y Especial garantiza el cumplimiento del Título VI, 49 CFR, parte 21 de la Ley de Derechos Civiles (*Civil Rights Act*) de 1964, leyes y reglamentos relacionados con el fin de que ninguna persona sea excluida de los beneficios o se le nieguen los mismos, o sea víctima de discriminación por motivos de raza, color, sexo o nacionalidad en cualquier programa o actividad que reciba ayuda financiera del Departamento de Transporte de los Estados Unidos.

Cualquier persona que crea haber sido víctima de discriminación debe comunicarse con:

Benton County Special and Rural Transportation
Lee Lazaro, Gerente de Derechos
PO Box 1083, Corvallis OR 97339-1083
TELEFONO (541) 754-1748
Lee.Lazaro@corvallisoregon.gov

ATTACHMENT B



Benton County Special and Rural Transportation Title VI Complaint Form

Instructions: If you would like to submit a Title VI complaint to the Benton County Special Transportation Agency, please fill out the form below and send it to: Benton County Special Transportation, Attn: Title VI Coordinator, Box 1083, Corvallis, OR 97339-1083. For questions or a full copy of County's Title VI policy and complaint procedures call 541-754-1748 or email Lee Lazaro at lee.lazaro@corvallisoregon.gov.

1. Name (Complainant):	
2. Phone:	3. Home address (street no., city, state, zip):
4. If applicable, name of person(s) who allegedly discriminated against you:	
5. Location and position of person(s) if known:	6. Date of incident:
7. Discrimination because of: <input type="checkbox"/> Race <input type="checkbox"/> National origin <input type="checkbox"/> Color <input type="checkbox"/> Other <input type="checkbox"/> Sex <input type="checkbox"/> Disability	
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.	

9. Why do you believe these events occurred?	
10. What other information do you think is relevant to the investigation?	
11. How can this/these issue(s) be resolved to your satisfaction?	
<p>12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):</p> <p>Name: _____ Address: _____ Phone number: _____</p>	
<p>13. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, check all that apply:</p> <p><input type="checkbox"/> Federal agency <input type="checkbox"/> Federal court <input type="checkbox"/> State court</p> <p><input type="checkbox"/> Local agency <input type="checkbox"/> State agency</p> <p>If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.</p> <p>Agency/Court: _____ Contact's Name: _____ Address: _____ Phone number: _____</p>	
Signature (Complainant):	Date of filing:

ATTACHMENT C



Corvallis Area *Metropolitan Planning Organization*

Corvallis Area Metropolitan Planning Area (CAMPO) Public Involvement Framework

In an effort to enhance the quality of CAMPO's transportation planning and programming processes and to comply with federal and state requirements, the agency has developed the following public involvement goal, objectives and policies.

Goal

The goal of the CAMPO's Public Involvement Process is to gain to the maximum extent possible the active participation of all citizens and stakeholders in the MPO's transportation planning and programming activities.

Objectives

The objectives of the CAMPO Public Involvement Process are to:

1. Inform the public about transportation issues under consideration by the MPO;
2. Provide opportunities to the public to get involved in all phases of transportation planning process;
3. Coordinate the MPO's activities with those of other public agencies and stakeholders;
4. Coordinate the MPO's activities with transit providers within and adjacent to the MPO Area;
5. Provide timely notice to the public on all transportation planning and programming activities;
6. Provide for the consideration of all input received from the public;
7. Provide timely responses to comments received on the agency's plans and programs;
8. Identify and involve traditionally underserved segments of the population, including minorities, low-income people, people with disabilities and people with Limited English Proficiency (LEP);
9. Employ the most effective means of communications to involve the public and stakeholders in the planning process.

Public Involvement Policies

CAMPO's public involvement policies are relative to the type of its activities. For this purpose, CAMPO's activities are divided into Routine and Major.

1. **Routine Activities.** These are primarily administrative tasks that are performed routinely over the course of a year or two. Examples of these are the development of the Unified Planning Work Program (UPWP), the Self-Certification Process and the monthly meetings of the Policy Board and the Technical Advisory Committee. For these activities CAMPO will, at a minimum, conduct the following:

- a. Post MPO documents on the website and make copies available to the public;
 - b. Post meeting dates, agendas and minutes on the MPO website;
 - c. Provide an explanation of the issues on the website;
 - d. Invite the public to submit comments in writing, through email or by telephone;
 - e. Provide the Policy Board a summary of comments received prior to any formal decision;
 - f. Provide a public comment opportunity on each Policy Board agenda;
 - g. Announcing the Meetings of the Policy Board in the newspaper;
 - h. Provide additional opportunity for public review and comments when the final version of a transportation document is significantly different from the one viewed by the public.
- 2. Major Activities.** Major activities are transportation planning and programming efforts that are undertaken periodically. Examples of these are the development and periodic update of the MPO's Regional Transportation Plan and Transportation Improvement Program or the undertaking of special studies. These are performed every two to five years. For these functions, CAMPO will develop a specific public involvement program prior to the commencement of that activity. The specially tailored programs, at a minimum, will include all the elements listed above for Routine MPO Activities and will also include public informational meetings and solicitation of public comments.

Means of Public Outreach

In developing special public involvement programs, CAMPO may employ a combination of the following measures:

1. Active Public Participation

- a. Holding public meetings in various forms, i.e., facilitated workshops, theatre or open house;
- b. Forming Ad hoc committees, task forces, focus groups, charrettes and other small group techniques;
- c. Conducting public opinion surveys;
- d. Holding public hearings;
- e. Holding public comment periods;
- f. Developing and maintaining a special webpage with commenting facility;
- g. Issuing electronic newsletters.

2. Accessibility of Information

- a. Making major transportation planning documents available at libraries, city halls, Benton County Public Works, and on the web
- b. Making presentations on transportation planning issues to stakeholders and community groups, as appropriate
- c. Providing the Policy Board with summary transcripts of public comments prior to their decisions

3. Channels of Public Notification

- a. Posting information and documents in CAMPO website
- b. Purchasing advertisements in media
- c. Issuing press releases, and using public service announcements
- d. Posting legal notices in printed media
- e. Sending direct mail to a list of interested individuals, stakeholders, affected businesses and neighborhoods, and special interests groups
- f. Holding direct lines of communication with stakeholders
- g. Posting notices on bulletin boards in high traffic locations, including libraries, public offices, and the university campus
- h. Issuing periodic newsletter on CAMPO's transportation planning activities
- i. Using local and public access TV channels
- j. Consulting with appropriate advisory committees and commissions in the area
- k. Utilizing electronic bulletin boards or other forms of social media

Periodic Evaluation

Metropolitan Transportation Planning Regulations require periodic review of the effectiveness of the MPO's public involvement process. CAMPO will periodically review its public involvement process to ensure that all interested parties, including transportation stakeholders and

traditionally underserved groups, have been provided with equal opportunities to participate in the transportation planning processes. A variety of tools may be used for this review, including, but not limited to, those listed below:

- a. Use of meeting evaluation forms;
- b. Surveys to inquire whether citizens have heard about CAMPO's public meetings and/or other public involvement opportunities;
- c. Input from citizens through phone calls, letters and emails or comments made at public meetings;
- d. Holding a public meeting on the updated document
- e. Consultation with the Technical Advisory Committee.

The CAMPO Policy Board will ultimately determine the need for such periodic evaluations and any modifications to this document.

ATTACHMENT D



**BENTON COUNTY SPECIAL AND RURAL TRANSPORTATION PROGRAM
LIMITED ENGLISH PROFICIENCY PLAN
August, 2014**

Benton County Special and Rural Transportation (BCSRT) is required to take responsible steps to ensure meaningful access to the benefits, services, and information by individuals who are Limited English Proficient (LEP). BCSRT consulted the USDOT's LEP Guidance and performed a four factor analysis of our contact with the public to determine the appropriate mix of LEP services to offer.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons in the service area.

Step A: Prior experience with LEP individuals. Over the past year, our dispatchers have taken only 3 phone calls from LEP persons which have required the use of an interpreter. In each case, a family member of the caller was able to assist with interpretation.

Step B: Data-gathering. Information was gathered from the following sources to identify information on persons who speak languages other than English at home and those who speak English less than well or not at all and would be classified as Limited English Proficient or "LEP":

- a. 2010 Census Data
- b. Census Bureau's 2012 American Community Survey and Fact Finder Surveys
- c. Oregon Rural Community Explorer, Oregon State University

Step C: Data Analysis. According to the Portland University Population Research Center, which uses US Census and American Community Survey data in its models, Benton County's estimated 2012 population was 86,785. A review of the 2012 American Community Survey data (<http://factfinder.census.gov>) indicates that of this 86,785 population, 7,577 individuals were foreign-born outside of the United States. The number of people over age 5 who speak a language other than English at home was 11.8% of the total population, with 3.8% of the County population reporting that they speak English less than "very well." The most common language other than English spoken at home was a mixed bag: Spanish was the most common, with 4.8% of the population recorded as speaking Spanish or Spanish Creole. Asian and Pacific Islander languages represents an additional 3.6%; other Indo-European languages (most likely Russian or Slavic) are spoken by 2.3%; and all other languages are spoken by 1.2% of the population.

According to the Rural Community Explorer, statistically there are an estimated 2,077 persons over the age of 5 in Benton County who are linguistically isolated – this would correspond to a determination of our limited English proficiency community. According to the survey, the group most likely to report not speaking English well are the Spanish-speaking population. (Source: American Community Survey, 2008-2012 American Community Survey 5-Year Estimates, S1601, Benton County, Oregon). Like other rural Oregon counties, many foreign-born Spanish-speaking individuals work in agriculture or related businesses.

STATE OF OREGON - LANGUAGE SPOKEN AT HOME								
2008-2012 American Community Survey 5-Year Estimates S1601								
Oregon County	Language Spoken at Home	Total Population 5 years and over	Speak only English	Speak a language other than English				
					Spanish or Spanish Creole	Other Indo-European languages	Asian and Pacific Island languages	Other languages
Benton	Total	81,692	88.20%	11.20%	4.60%	2.30%	3.60%	1.20%
	Speak English "very well"	96.20%	(X)	72.2%	66.1%	83.8%	69.6%	82.0%
	Speak English less than "very well"	3.80%	(X)	27.8%	33.9%	16.2%	30.4%	18.0%

Factor 2: The frequency of contact with LEP individuals in the service.

BCSRT serves LEP persons infrequently through rural transit, senior and disabled transportation, and paratransit services. Over the past year, our dispatcher has taken only 3 phone calls from LEP persons in our area which has required the use of an interpreter. In each case, a family member of the caller was able to assist with interpretation.

Factor 3: The importance of the service to LEP persons.

Corvallis Transit System (CTS) is the major fixed route public transportation provider in the City of Corvallis and provides a link between residential areas, commercial centers, healthcare facilities, educational campuses, and social service offices. BCSRT services compliment CTS through provision of rides to seniors and persons with disabilities within the City, and for the general public in rural areas such as Adair Village, Philomath, Alsea, and Toledo, with a connection on to Newport on the coast. The BCSRT contractor, Benton County Dial-a-Bus, also provides complimentary paratransit service for CTS. The Philomath Connector, operated by the City of Philomath in conjunction with CTS, links Philomath to Corvallis.

Language barriers would most affect users of the senior, disabled, and complementary paratransit Dial-a-Bus service, as reservations for the system are taken via telephone.

The complementary paratransit service provides only a very small portion of the almost one million total annual rides provided by CTS.

The BCSRT contractor reports that typically, the small number of LEP callers are able to be assisted by other family members who are more proficient in English. There have been zero service denials to individuals due to limited English proficiency.

Factor 4: The resources available to assure access to services by LEP persons

BCSRT currently provides some information in Spanish through bus schedules, and information on the buses. Both Benton County and the City of Corvallis maintain a list of employees who are fluent in Spanish and other languages, and can assist with telephone or in-person interpretation. Professional translation services are utilized when required for written communications.

Resources for Providing Language Assistance Services

Based on the four factor analysis, BCSRT recognizes the need to continue providing language services, and to improve the outreach efforts presently provided. A review of relevant programs, activities and services that are presently being offered include:

- Spanish speaking translators who work at Benton County or City of Corvallis are available upon request during normal business hours
- Regular Dial-a-Bus route and schedule information are available in Spanish on printed brochures
- City and County community surveys are available in Spanish format

Based on the demand for alternate language services, and considering the limited budget of the BCSRT program, other activities and services that will be developed in the next three years include:

- BCSRT will enter into a contract with an interpretation service provider or “Language Line” for phone calls taken from LEP individuals
- All BCSRT brochures and route maps, including the 99 Express and Coast-to-Valley service, will be updated and will have a Spanish-language version
- Spanish translation off route, schedule, and fare information will be made available on the BCSRT website

Outreach to the LEP Community

BCSRT’s outreach and marketing initiatives have yielded a list of community organizations that serve populations with limited English proficiency. The following list of community organizations will be contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

- Corvallis Public School District
- Linn Benton Hispanic Advisory Committee
- Corvallis Area Chamber of Commerce
- Corvallis Public Participation Task Force
- Benton County Health Navigation Program

Providing Notice to LEP's of Language Assistance

Once the above-noted language assistance improvements are fully in place, notice will be placed on the BCSRT buses, website, and on the bus schedule brochures announcing the availability of language assistance.

Monitoring, evaluating and updating LAP

Albany Transit staff will contact the community organizations that serve LEP persons, as well LEP persons themselves, and also perform a four factor analysis every three years to identify what, if any, additional information or activities might better improve transit services to assure non-discriminatory service to LEP persons. ATS will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

Training Employees

BCSRT will facilitate training of contractor employees and volunteers to proficiency regarding the need and availability of language assistance to LEP individuals who use the service. Employees will be encouraged to use the services provided when contact with LEP individuals prevents or hinders communication. This training will be provided at least annually.