



**BENTON AREA  
TRANSIT**

**2023**

**Title VI Plan**



**Benton  
County**  
OREGON

Benton Area Transit  
December 2023



## RECIPIENT INFORMATION

**RECIPIENT:** Benton County, OR

**EXPIRATION YEAR:** 2023-2026

**CONTACT INFORMATION:**

Special & Rural Transportation Coordinator  
Phone: 541-754-1748

Lisa Scherf, PE  
Public Transportation Services Supervisor  
Lisa.Scherf@CorvallisOregon.gov  
Phone: 541-754-1759

Gary Stockhoff, PE  
Public Works Director  
Gary.Stockhoff@Co.Benton.OR.US  
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## Introduction

In Accordance with Title VI of the Civil Rights Act of 1964, this program reflects Benton County's commitment to ensuring that no person shall, on the ground 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 provided by Benton County.

## Signed Policy Statement

A policy statement signed by the Benton County Title VI Coordinator's assuring Benton Area Transit (BAT)'s compliance with Title VI of the Civil Rights Act of 1964 can be found as **Attachment A**.

## Title VI Notice to the Public

The Benton County Title VI Notice to the Public shall be posted at the following locations. A copy of the public notice can be found as **Attachment E**:

- Benton Area Transit website:  
<https://www.co.benton.or.us/ridethebat/page/title-vi-non-discrimination-program>
- City of Corvallis Public Works Office
- Benton County Board of Commissioners Office
- On-board BAT buses

## Title VI Complaint Procedures

Benton County 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. Full procedures for filing a complaint and the County's procedures for investigating complaints can be found as **Attachment B**. At a minimum, the complaint shall include the following information:

- Name, mailing address, and how to contact complainant (i.e., telephone number, e-mail address, etc.)
- How, when, where, and why complainant alleges s/he was discriminated against. Include the location and names and contact information of any witnesses.
- Other significant information.



The complaint may be filed in writing with BAT at the following address:

Benton Area Transit  
Title VI Coordinator  
Benton County Public Works  
360 SW Avery Ave  
Corvallis, OR 97333  
by Phone: 541-766-6700  
By Facsimile: 541-766-6891

A sample Title VI Complaint Form can be found as **Attachment C**

## **Record of Title VI investigations, Complaints, or Lawsuits**

Benton County will maintain a list of any and all transit related Title VI investigations, complaints, and lawsuits. The most current list shall be kept and maintained at the Benton County Public Works Office the located at 360 SW Avery Ave, Corvallis, OR 97333. However, a list of complaints since 2017 is below.

### **List of Title VI Complaints**

As of 8/17/2023, no Title VI Complaints have been filed since the last Title VI Program Update in 2017.

## **Representation of Minorities on Non-elected Bodies**

Benton County encourages the participation of minorities on its advisory bodies. Benton County has one advisory committee associated with its transit program. For Title VI purposes, the Federal Transit Administration defines minority persons to include the following groups: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander. Below is a table documenting the minority composition of the membership for this committee:

### **Statewide Transportation Improvement Fund (STIF) Advisory Committee**

<b>Member</b>	<b>Represents</b>	<b>Ethnicity</b>
K.H-Z.	Seniors	Caucasian
K.J.	People with Disabilities	Caucasian
G.G.	Transportation Provider	Caucasian
J.C.	People with Low-Income	Caucasian
H.H.	Environmental Advocate	Caucasian
D.R.	Bike/Pedestrian Advocate	Caucasian
S.B.	Educational Institution	Caucasian
N.M.	Local Government	Caucasian



## Title VI Public Participation Plan

Benton County shall strive to include community members from underrepresented groups and individuals with Limited English Proficiency (LEP individuals) in its decision making processes. This includes outreach to communities in Benton County and its surrounding area through various forms of communication and outreach.

Based on the need for alternate language services, and considering the limited budget of the Benton County programs, other activities and services that will be developed in the next three years include:

- Transit surveys conducted by Benton County will be available in English, Spanish, and Traditional and Simplified Chinese
- Future route maps will be available in English, Spanish, and Traditional and Simplified Chinese
- Local translation services will be contacted and, if feasible, placed on retainer

Benton County'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
- Benton County Health Department
- Hispanic Advisory Council
- Corvallis Area Chamber of Commerce
- Casa Latinos Unidos

In addition to these activities, BAT will continue to encourage public participation, especially from LEP communities, using the following strategies:

- Scheduling meetings at times and locations, preferably accessible by public transit, that are convenient and accessible for minority and LEP communities
- Using different meeting formats through virtual and in-person settings
- Coordinating with community- and faith-based organizations, educational institutions, and other culturally specific organizations to implement public engagement strategies that reach out specifically to members of traditionally underserved and LEP communities
- As appropriate, using radio, television, or newspaper ads on stations and in publications that serve LEP populations.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments



## Summary of Ongoing Public Participation Efforts and Outreach

Since the last Title VI reporting submission, Benton County conducted the following public outreach and involvement activities:

In accordance with Oregon public meeting law, all public meetings including transportation planning meetings are open to the general public. Accommodations are available for those with limited English proficiency if requested in advance of the meeting.

### General Awareness and Phone Surveys

Benton Area Transit conducts onboard rider and general awareness surveys periodically, and Benton County conducts community surveys at regular intervals. The most recent community survey was conducted in 2020 and was available in English and Spanish. Future community surveys and transit surveys will be available in English, Spanish, and Traditional and Modified Chinese.

### Outreach to Limited English Proficiency Individuals and Communities

Benton County utilizes language service contracts that assist in providing translation and interpretation services for languages spoken throughout the County and surrounding areas.

### Schedules translated in Spanish

The current service schedule includes a section that has been translated into Spanish. New service schedules will be provided in English, Spanish, and Traditional and Simplified Chinese and made available via paper brochures and on the Benton Area Transit website.

## Primary recipients and monitoring sub recipients

Benton Area Transit does not have subrecipients at this time. However, BAT will continue to monitor its contractor for services for compliance with these provisions.

## Title VI Equity Analysis

There are no current planned facilities or construction projects that require a Title VI equity analysis.



## Service Standards

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

The vehicle load standards by mode for Benton Area Transit are: Vehicle Load Standards are expressed as a ratio. (A 26-passenger bus that allows 5 standees would have a load standard of 1.2)

Fixed Route (26 passenger bus)	1.2
Demand-Response (5 passenger van)	.2

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

Fixed Route (26 passenger bus)	120 mins
Demand-Response (5 passenger van)	N/A

On Time Performance for Each Mode

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

Service Availability for Each Mode

Benton Area Transit strives to provide equitable service availability to customers within the service area.

Distribution of Transit Amenities

Benton Area Transit has a policy to distribute transit amenities equally across the system. Any new amenities will be distributed equally across the system without regard to race or national origin of users from that service area. This applies to:

- Seating and benches at stops and stations
- Bus shelters
- Provision of information including maps, route maps, and schedules





- Waste receptacles

### **Vehicle Assignment**

Benton Area Transit sets a policy of vehicle assignment without regard to race, color, national origin, religion age, marital status, sexual orientation, or disability of users from that service area. All Benton County-owned vehicles are ADA-Accessible. Age of the vehicles will only be considered a factor when assigning vehicles to longer-distance routes. Vehicle size is considered depending on the expected level of demand for service.



## Attachment A

### Benton County TITLE VI

#### NON-DISCRIMINATION POLICY STATEMENT

August 23, 2023

Under Title VI of the Civil Rights Act of 1964 and related authorities:

“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.”

Benton County is committed to complying with the requirements of Title VI in all of its programs and activities. Questions and complaints may be reported to Title VI Coordinator, at 541-766-6700; by email to [BAT@co.benton.or.us](mailto:BAT@co.benton.or.us); or by letter to 360 SW Avery Ave, Corvallis, OR 97339.



## Attachment B

### Discrimination Complaint Procedure

1. Any person who believes that he or she, has been subjected to discrimination prohibited by the Americans with Disabilities Act (ADA) or Title VI of the Civil Rights Act of 1964, may file a complaint with Benton Area Transit (BAT). A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Benton County Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after: a) The date of alleged act of discrimination; or b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued. In either case, the Title VI Coordinator may extend the time for filing or waive the time limit in the interest of justice, as long as the Title VI Coordinator specifies in writing the reason for so doing.
3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Benton County, the person shall be interviewed by the Benton County Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature.
4. Within 30 days, the Benton County Title VI Coordinator will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as ODOT and FTA.
5. If the Complainant is not satisfied with the outcome of the investigation, they may appeal the decision. An appeal may be initiated by advising BAT, or specifically, the Title VI Coordinator in writing or by phone call that an appeal is requested.
6. Any appeal will be heard by Benton County Benton County Public Works Director. The Complainant will be contacted for more information as to why they were not satisfied with the outcome of the Complaint. All evidence will be reviewed by the secondary investigators, and a new decision issued.
7. The recipient will advise ODOT of all allegations. Generally, the following information will be included in every notification to ODOT:
  - a. Name, address, and phone number of the complainant.
  - b. Name(s) and address(es) of alleged discriminating official(s).
  - c. Basis of complaint (i.e., race, color, or national origin)
  - d. Date of alleged discriminatory act(s).
  - e. Date of complaint received by the recipient.



- f. A statement of the complaint.
  - g. Other agencies (state, local or Federal) where the complaint has been filed.
  - h. An explanation of the actions Benton County has taken or proposed to resolve the issue in the complaint.
  - i. Within 90 days of receipt of the complaint, the Benton County Public Works Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or FTA, if they are dissatisfied with the final decision rendered by Benton County. The Public Works Director will also provide ODOT and/or FTA with a copy of this decision and summary of findings upon completion of the investigation.
8. In the event the Complainant is not satisfied with the outcome of an appeal, or if he/she wished to file a complaint directly to an outside agency, contacts for the different Title VI administrative jurisdictions are as follows:

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  
Office of Civil Rights  
Attention: Title VI Program Coordinator  
1200 New Jersey Ave.,  
SE Washington, DC 20590

FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov). These procedures are also outlined in FTA Circular 4702.1A. Chapter IX. A Complainant has the right to contact these organizations directly; however, Benton County will ultimately be responsible for all initial investigation, as they have the resources and access to interview any involved employees directly.



# Attachment C

## Benton County ADA & Title VI Complaint Form

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Were you discriminated against because of your (can select multiple):

- Race
- Disability
- Color
- Other: \_\_\_\_\_
- National Origin

Date and Time of Alleged Incident: \_\_\_\_\_

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved and if applicable, the transit route and vehicle. Be sure to include the names and contact information of any witnesses. If more space is needed, please use additional pages.

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Have you filed this complaint with any other federal, state or local agency or with any court?  Yes  No

If yes, check and identify all that apply:



- Federal Agency \_\_\_\_\_
- Federal Court \_\_\_\_\_
- State Agency \_\_\_\_\_
- State Court \_\_\_\_\_
- Local Agency \_\_\_\_\_

Please provide information for a contact person at the Agency or Court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, & Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Please sign below. You may attach any additional written materials or other information you believe is relevant to your complaint.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please mail this form to:**

Title VI Coordinator  
Benton Area Transit  
360 SW Avery Ave.  
Corvallis, OR 97339



## Attachment D

### BENTON COUNTY LANGUAGE ACCESS PLAN (LAP) FOR LIMITED ENGLISH PROFICIENCY RIDERS AUGUST 17, 2023

Benton County is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of individuals who are Limited English Proficient (LEP). Benton County 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 1: Prior experience with LEP individuals. Since the 2017 update, our dispatchers have taken less than 10 phone calls from LEP persons which have required the use of an interpreter. Additionally, drivers have reported a limited number of LEP persons within the same timeframe.

#### Step 2: Analysis of Census Data

2023 5-Year American Community Survey (ACS) Data Label	Estimate	%
Total:	90,932	
Speak only English	78,520	
Spanish:	4,460	
Speak English "very well"	3,225	
<b>Speak English less than "very well"</b>	<b>1,235</b>	<b>1.36%</b>
French, Haitian, or Cajun:	692	
Speak English "very well"	638	
Speak English less than "very well"	54	
German or other West Germanic languages:	401	
Speak English "very well"	364	
Speak English less than "very well"	37	
Russian, Polish, or other Slavic languages:	451	
Speak English "very well"	339	
Speak English less than "very well"	112	

Other Indo-European languages:	836	
Speak English "very well"	804	
Speak English less than "very well"	32	
Korean:	966	
Speak English "very well"	504	
Speak English less than "very well"	462	
Chinese (incl. Mandarin, Cantonese):	2,339	
Speak English "very well"	1,013	
<b>Speak English less than "very well"</b>	<b>1,326</b>	<b>1.46%</b>
Vietnamese:	309	
Speak English "very well"	213	
Speak English less than "very well"	96	
Tagalog (incl. Filipino):	235	
Speak English "very well"	227	
Speak English less than "very well"	8	
Other Asian and Pacific Island languages:	962	
Speak English "very well"	517	
Speak English less than "very well"	445	
Arabic:	294	
Speak English "very well"	170	
Speak English less than "very well"	124	
Other and unspecified languages:	467	
Speak English "very well"	258	
Speak English less than "very well"	209	

<sup>1</sup>The total population of Benton County over this period was 90,932. For each identified language group, the number of speakers of that language who also speak English "less than very well" are highlighted in blue.





Two languages groups in the County had met the threshold of over 1,000 individuals or 5% of the overall population that speak English “less than very well.” Those languages are Spanish, Cantonese, and Mandarin. While Spanish was a threshold language in the most recent Title VI Program, Cantonese and Mandarin are new language groups to meet this threshold.

Factor 2: The frequency with which LEP individuals come into contact with the service.

Benton County serves LEP persons daily through transit and paratransit services. Since the 2017 Title VI Plan Update, our records indicate that dispatchers have taken less than 10 phone calls from LEP persons in our area that required the use of an interpreter. Additionally, drivers have reported a limited number of instances where an LEP individual requested this service. This can be due to a lack of awareness within the LEP community about language services that may be available to them.

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

Benton County provides important transit services to the public through its fixed route and demand-response programs. Benton Area Transit provides a link between residential areas, commercial centers, healthcare facilities, educational campuses, offices, grocery stores, parks, and other community resources. Language barriers would most affect users of the demand-response services as reservations for these services are taken via telephone. Demand-response services provide approximately 49% of the total rides provided by Benton Area Transit.

Factor 4: The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Benton Area Transit currently provides some information in Spanish through bus schedules, the transit website, and information on the buses. Benton County maintains a language services liaison in each department and contracts with translation and interpretation services. BAT also contracts with Language Line Solutions to assist LEP individuals with phone inquiries.

As Cantonese and Mandarin were new additions to the LEP plan upon reviewing the most recent Census Data, Benton County is now working to address the needs of Cantonese and Mandarin speakers, through the contracted language service provider.

**Designation of Vital Documents**

Given the limited resources of BAT, and the small number of documented instances where language assistance was requested or needed, BAT will limit its designation of Vital Documents to be translated into all threshold languages as the following: Title VI Notice; Combined ADA/Title VI Complaint Form; and the ADA/Title VI Complaint Process.

**Processes for providing language assistance services by language:**

Based on the four-factor analysis, Benton Area Transit recognizes the need to continue providing language services. A review of Benton County’s relevant programs, activities and services that are being offered by the County as of August, 2023 include:

For Spanish Speakers:

- The transit program uses services provided by Language Line Solutions for phone calls taken from LEP community members



- Spanish speaking interpreters who work at the County are available upon request during normal business hours if Language Line Solutions is unable to support any interpretation request
- Community surveys are available in Spanish format

#### For Cantonese and Mandarin Speakers:

- As these are new threshold languages, BAT will work to implement full services for these riders over the next year.
- The transit program has a contract with Language Line Solutions for phone calls taken from LEP community members
- BAT will reach out to the Language Department at Oregon State University to identify local Cantonese or Mandarin speakers who may be able to assist or contract with BAT to provide interpretation or translation services.
- BAT will soon have vital documents translated to Traditional and Simplified Chinese.
- BAT will search for any Chinese affinity groups organizations that may aid in outreach to Cantonese and Mandarin speaking communities.

#### Providing notice to LEP's of language assistance

Notice will be placed on the transit buses, transit website, and on the bus schedules, and brochures announcing the availability of language assistance.

#### Monitoring, evaluating and updating LEP

Benton County 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. Benton County 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

Benton County will train all employees, staff 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 communication with LEP individuals is inhibited by language barriers. This training will be provided annually and as needed.



## Attachment E

### Notice to the Public

#### TITLE VI

Benton County operates its programs, including the provision of transit services, without regard to race, color or national origin.

For inquiries about the Benton County's non-discrimination policies, or to file a discrimination complaint, visit our website at [RidetheBAT.com](http://RidetheBAT.com), or contact the Title VI Coordinator with Benton Area Transit, 541-766-6700.

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El condado de Benton opera sus programas, incluida la prestación de servicios de tránsito, sin distinción de raza, color u origen nacional.

Para consultas sobre las políticas de no discriminación del condado de Benton, o para presentar una queja por discriminación, visite nuestro sitio web en [RidetheBAT.com](http://RidetheBAT.com), o comuníquese con el Coordinador del Título VI con Benton Area Transit, 541-766-6700.

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本顿县运营其项目，包括提供交通服务，不考虑种族、肤色或国籍。  
如需了解本顿县的非歧视政策或提出歧视投诉，请访问我们的网站 [RidetheBAT.com](http://RidetheBAT.com)，或联系本顿地区交通部门的第六章协调员，电话：541-766-6700。

Běn dùn xiàn yùnyíng qí xiàngmù, bāokuò tígōng jiāotōng fúwù, bù kǎolǜ zhǒngzú, fūsè huò guójí.

Rú xū liǎojiě běn dùn xiàn de fēi qíshì zhèngcè huò tíchū qíshì tóusù, qǐng fǎngwèn 19uan19 de wǎngzhàn [RidetheBAT.Com](http://RidetheBAT.Com), huò liánxì běn dùn dìqū jiāotōng bùmén de dì liù zhāng xiétíáo 19uan, diànhuà: 541-766-6700.

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本頓縣運營其項目，包括提供交通服務，不考慮種族、膚色或國籍。

如需了解本頓縣的非歧視政策或提出歧視投訴，請訪問我們的網站 [RidetheBAT.com](http://RidetheBAT.com)，或聯繫本頓地區交通部門的第六章協調員，電話：541-766-6700。