

2019 Palm Tran Title VI Program Update



SEPTEMBER 2019



PALM BEACH COUNTY, FLORIDA

PUBLIC TRANSIT SYSTEM

Provider: PALM TRAN

2019 TITLE VI PROGRAM UPDATE

**SUBMISSION TO THE FEDERAL TRANSIT
ADMINISTRATION (FTA)**

IN FULFILLMENT OF

**REPORTING REQUIREMENTS OUTLINED IN FTA
CIRCULAR 4702.1B (10-1-2012)**

and

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

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INTRODUCTION

Palm Beach County, as a designated recipient of the Federal Transit Administration (FTA), submits this Title VI Program Update in compliance with Title VI of the Civil Rights Act of 1964, and the implementation guidelines found in FTA Circular 4702.1B, published October 1, 2012.

Palm Beach County is the designated recipient of FTA funds for the County's public transit system, known as Palm Tran. In January 1996, the County determined that the interests of the County and the residents were best served if bus transportation and paratransit services in the County were operated and managed by Palm Tran Inc., a not-for-profit corporation created as an instrumentality of the County. Palm Tran Inc. is a public entity controlled and operated by Palm Beach County, Palm Tran is also a department of the County.

The purpose of the update is to describe how Palm Tran, Palm Beach County's Public Transit System, is complying with Title VI requirements. Its intent is to identify both the steps already taken and any additional steps that will be taken to ensure that, for all programs and activities supported by federal financial assistance, Palm Tran provides services without excluding or discriminating on the grounds of race, color or national origin, or creating additional barriers to accessing services and activities.

Consistent with its commitment to meet FTA regulatory requirements, this plan update was prepared in accordance with:

- Title VI of the Civil Rights Act of 1964 and related statutes
- 49 CFR 21
- FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"
- U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087 (December 14, 2005)
- DOT Guidance of 2001: To Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries
- Executive Order 13166 of August 11, 2000: Limited English Proficiency (LEP)
- Executive Order 12898 of February 1994: Environmental Justice Executive Order

Palm Tran operates fixed-route bus service directly. Thirty-two fixed routes serve areas throughout the County. Service is provided weekdays from 5 a.m. to 11 p.m., on Saturdays from 6 a.m. to 10 p.m., and on Sundays from 8 a.m. to 7 p.m. There is no service on seven major holidays. Palm Tran contracts with two private operators for the Palm Tran CONNECTION paratransit service. CONNECTION service is available for ADA-certified customers, and for customers eligible under the County's Division of Senior Services (DOSS) and Transportation Disadvantaged (TD) programs. CONNECTION operates during the same days and hours of service as the fixed routes. The population of the service area is approximately 1.4 million people. The service area is the entire County with Palm Beach County being the largest of the 67 counties in Florida. The Title VI Program Update incorporates Chapters III and IV from the FTA Circular 4702.1B published on October 12, 2012; Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

TITLE VI PROGRAM POLICIES

These Policies and Procedures were developed with public participation and approved by the Board of County Commissioners on September 24, 2013. The policies have not been modified since the Title VI Update approval in 2013.

PURPOSE:

To define the policies and procedures required to effectively comply with the Federal Title VI regulations to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner without regard to race, color or national origin.

POLICIES:

1. **Major Service Change** – It shall be the policy of Palm Beach County to minimize adverse effects of major service changes. Major Service changes are defined as either a 25% change in system-wide service hours or a 25% change in route-level mileage. Major Service changes must undergo an Equity Analysis and be approved by the Palm Tran Service Board.
2. **Equity Analysis (Service and Fare)** – It shall be the policy of Palm Beach County to complete an equity analysis to review the potential adverse effects of proposed changes that could result in an unequal distribution of burdens or benefits to Palm Tran customers. The analysis must be completed for: 1) major service changes, and 2) any fare change. The analysis will look specifically for Disparate Impact to minority populations and Disproportionate Burden to low-income populations. Results of the analysis must be approved by the governing board (Palm Tran Service Board – (PTSB) for Service / Board of County Commissioners – (BCC) for Fare) prior to implementing any fare or major service change.
3. **Disparate Impact** – It shall be the policy of Palm Beach County to minimize adverse effects of fare and major service changes so that they are not borne disproportionately by minority populations. The threshold to determine adverse disparate impact is established at 20% based on the cumulative impact of the proposed fare and/or service change. If disparate impact is identified, Palm Tran shall take actions to mitigate the situation, unless there is a substantial legitimate justification that prevents such actions.
4. **Disproportionate Burden** – It shall be the policy of Palm Beach County to minimize adverse effects of fare and major service changes so that they are not borne disproportionately by low-income populations. The threshold to determine disproportionate burden is established at 20% based on the cumulative impact of the proposed fare and/or service change. If disproportionate burden is identified, Palm Tran shall take actions to mitigate the situation, unless there is a substantial legitimate justification that prevents such actions.
5. **Service Monitoring**– It shall be the policy of Palm Beach County to ensure that negative impacts on the basis of race, color or national origin do not exist. The Disparate Impact thresholds for Service Standards are as follow:

- a. On-Time Performance: +/- 10% of the average performance of the sampled routes.
- b. Headway: +/- 5 minutes of the average performance of the sampled routes.
- c. Vehicle Load: + 5% of the maximum vehicle load.
- d. Service Availability: +/- 5% of the general measure of route distribution.

Palm Tran will monitor and test the application of the following items at least every three years: Vehicle Assignments, Distribution of Transit Amenities and Service Standards. Palm Tran will analyze the monitoring results and develop corrective action plans as needed. The results of the analysis must be approved by the Palm Tran Service Board.

- 6. **Vehicle Assignment** - It shall be the policy of Palm Beach County to ensure that the average vehicle age for minority routes are similar to that for Palm Tran's system-wide average vehicle age. The threshold to determine adverse disparate impact is established at 150% of the overall system average vehicle age. If disparate impact is identified, Palm Tran shall take actions to mitigate the situation, unless there is a substantial legitimate justification that prevents such actions.
- 7. **Distribution of Transit Amenities** - It shall be the policy of Palm Beach County to provide bus stop amenities based on ridership, location and connectivity to other bus routes where there is sufficient right-of-way and/or dedicated transit easement.

PROCEDURES:

- 1. **Major Service Change** – All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Palm Tran Service Board (PTSB) for its consideration and included in Palm Tran's Title VI Program with a record of the action taken by the Board.

Major Service change is defined as either a 25% change in system-wide service hours or a 25% change in route-level mileage.

Prior to Board approval, all major service changes will be subject to an equity analysis that will include an analysis of potential adverse effects to identify whether proposed changes would result in an unequal distribution of burdens or benefits.

EXCEPTIONS: Exceptions to the definition of "Major Service Change"

- I. The introduction or discontinuation of short or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- II. Reassignment of existing route numbers, including splitting or combining two or more routes, will not constitute a new transit route. However, if the reassignment will impact the number of transit revenue hours or the route path, the criteria listed below will be considered. Transit revenue hours refers to the amount of time that a bus is available to carry passengers.

Any aggregate change of 30 percent or less of the number of transit revenue hours of the reassigned routes over a three-year period for the day(s) of the week for which the change is proposed.

- III. The addition of a new transit route. New service on streets not previously used by any route (excluding major arterial streets and streets designated as a trunk route).
- IV. Changes to service on a route with fewer than 10 total trips in a typical service day, unless service on that route is eliminated completely on any such day.
- V. Changes to a “modified” route due to a Major Service change, unless service on that route is eliminated completely.

2. Equity Analysis (Service and Fare)

1) Service Equity Analysis

a. Service Equity Analysis for Minority Populations

- i. Use the major service change policy definition and describe the dataset(s) that will be used in the analysis.
- ii. Describe the techniques and/or technologies used to collect the data.
- iii. Evaluate the impacts of proposed service changes on minority populations. Specifically, compare the proportion of persons in the protected class who are adversely affected by the service change and the proportion of the persons not in the protected class who are adversely affected.
- iv. Compare existing service to proposed changes and calculate the absolute change as well as the percent change.
- v. Use the **disparate impact threshold** to determine whether the proposed major service change will result in adverse effects that are disproportionately borne by minority populations.
- vi. If a disparate impact is found, alternatives must be reviewed to mitigate the potential impact.
- vii. If a disparate impact is found and the service change is modified, the change must be re-analyzed.
- viii. Service changes that show disparate impact may only be implemented if:
 - A substantial legitimate justification exists: **and**
 - There are no alternatives that would have a less disparate impact on minority riders but would still accomplish legitimate program goals.
- ix. Brief and obtain approval from the Palm Tran Service Board, and the BCC when required.

b. Service Equity Analysis for Low-Income Populations

Note: Low income populations are not a protected class under Title VI. However, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate whether low-income populations will bear a disproportionate burden of the changes.

- i. Use the major service change policy definition and describe the dataset(s) that will be used in the analysis.
- ii. Describe the techniques and/or technologies used to collect the data.
- iii. Evaluate the impacts of proposed service changes on low-income populations. Specifically, compare the proportion of persons in the protected class who are adversely affected by the service change and the proportion of the persons not in the protected class who are adversely affected.
- iv. Compare existing service to proposed changes and calculate the absolute change as well as the percent change.
- v. Use the **disproportionate burden threshold** to determine whether the proposed major service change will result in adverse effects that are disproportionately borne by low-income populations.
- vi. If a disproportionate burden is found, alternatives must be reviewed to mitigate the potential impact.
- vii. Brief and obtain approval from the Palm Tran Service Board, and the BCC when required.

2) Fare Equity Analysis

a. Fare Equity Analysis for Minority Populations

- i. Describe the dataset(s) that will be used in the analysis of all fare changes.
- ii. Describe the techniques and/or technologies used to collect the data.
- iii. Determine the number and percent of users of each fare media being changed.
- iv. Review fares before the change and after the change.
- v. Compare the differences for each particular fare media between minority users and overall users.
- vi. Evaluate the impacts on minority populations.
- vii. Use the **disparate impact threshold** to determine whether the proposed fare change (for each media type) will result in adverse effects that are disproportionately borne by minority populations.

- viii. If a disparate impact is found, alternatives must be reviewed to mitigate the potential impact.
- ix. If a disparate impact is found and the fare change is modified, the change must be re-analyzed.
- x. Fare changes that show disparate impact may only be implemented if:
 - A substantial legitimate justification exists; **and**
 - There are no alternatives that would have a less disparate impact on minority riders but would still accomplish legitimate program goals.
- xi. Brief and obtain approval from the Board of County Commissioners.

b. Fare Equity Analysis for Low-Income Populations

Note: Low income populations are not a protected class under Title VI. However, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate whether low-income populations will bear a disproportionate burden of the changes.

- i. Define and describe the dataset(s) that will be used in the analysis of all fare changes.
- ii. Describe the techniques and/or technologies used to collect the data.
- iii. Determine the number and percent of users of each fare media being changed.
- iv. Review fares before the change and after the change.
- v. Compare the differences for each particular fare media between low-income users and overall users.
- vi. Evaluate the impacts on low-income populations.
- vii. Use the **disproportionate burden threshold** to determine whether the proposed major service change will result in adverse effects that are disproportionately borne by low-income populations.
- viii. If a disproportionate burden is found, alternatives must be reviewed to mitigate the potential impact.
- ix. If a disproportionate burden is found and the fare change is modified, the change must be re-analyzed.
- x. Fare Changes that show disproportionate burden may only be implemented if:
 - A substantial legitimate justification exists; **and**
 - There are no alternatives that would have a less disproportionate burden on low-income riders but would still accomplish legitimate program goals.
- xi. Brief and obtain approval from the Board of County Commissioners.

3. Service Monitoring – Will be completed once every three years using the following methodology:

- a. Use the minority transit route definition and select a sample of minority and non-minority routes.
- b. Assess the performance of each minority and non-minority route in the sample for each service standard and service policy.
- c. Compare transit service observed to the established standards and policies.
- d. Mitigate as needed to ensure service standards and service policies are being met.
- e. Brief and obtain approval from the Palm Tran Service Board and/or the BCC as required.
- f. Submit results of the monitoring program, board approval and backup documentation to the FTA every three years as part of the Title VI Program update.

4. Vehicle Assignment - Bus operators have three periods during the year when they sign-up for their assigned work. This distribution of duties is called a BID. Prior to each operator BID assignment, a baseline vehicle schedule is prepared for the upcoming BID period. Low-mileage vehicles are usually assigned to the Belle Glade Area located 43.4 miles from the main maintenance facility and higher-mileage blocks, to minimize the risk of breakdowns. High Capacity (Articulated) buses are assigned based on ridership needs. Vehicle assignment is based on the size of the vehicle (some routes have size restrictions due to turn radius and barrier restrictions) and the passenger loads on each particular route. New vehicles replace those buses that have met their useful life, and new buses are distributed to the locations where replacements are needed.

On a daily basis, the Maintenance Department makes adjustments to the baseline vehicle schedule according to maintenance needs. For the purposes of Title VI service monitoring, Palm Tran calculates the average vehicle age for each route, and aggregates this data into an average vehicle age for all minority routes. Palm Tran's Title VI goal is for the average vehicle age for minority routes to be similar to that for Palm Tran's overall system. The threshold to determine adverse disparate impact is established at 150% of the overall system average vehicle age.

All vehicles on the fleet are low floor buses equipped with air conditioning.

5. Distribution of Transit Amenities - Installation of transit infrastructure/amenities along bus routes is based on the number of average daily passenger boardings derived from Automatic Passenger Counters, and location and connectivity to other bus routes. Placement is dependent on sufficient right-of-way and/or dedicated transit easement to ensure the Bus Stop infrastructure is ADA accessible and in adherence to Federal ADA Standards and applicable Florida Statutes.

Shelters and Benches

Locations for advertisement-supported shelters and benches are suggested by a contractor(s) and follow the guidelines established in the current Florida Accessing Transit Design Handbook for Florida Bus Passenger Facilities. Municipalities with a non-advertising ordinance(s) or policy, provide bus shelters within their boundaries and are encouraged to follow the above guidelines.

Provision of Information

Bus Stop Signage includes:

1. Standard 12 x 24 inch bus stop sign containing:
 - a. Palm Tran logo
 - b. Customer Service Telephone Number
 - c. Unique Bus Stop Number for each specific bus stop
 - d. Palm Tran Routes served at this specific bus stop
2. Standard reflector
3. Braille/Tactile Bus Stop identifier
4. System maps are placed in all Palm Tran provided bus shelters
5. Waste receptacles are placed adjacent to all Palm Tran provided bus benches and shelters
6. Route Specific schedules and maps are initially provided on the bus stop channel at all designated time points/nodes

Palm Tran maintains a GIS database of all bus stops and associated infrastructure.

TITLE VI NOTICE TO THE PUBLIC

This notice was revised on July 2015.

This notice is posted in English, Spanish and Creole

PALM TRAN'S NON-DISCRIMINATION POLICY

FEDERAL TITLE VI CIVIL RIGHTS ASSURANCE NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

Palm Tran hereby gives public notice that it is Palm Tran's policy to assure full compliance with Title VI of the Civil Rights Act of 1964 (Title VI), and the Americans with Disabilities Act (ADA). Palm Tran is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, or be subjected to discrimination on the basis of race, color, sex or national origin (Title VI) or because of an individual's disability (ADA).

Modifications to Policies and Procedures: Palm Tran will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. The ADA does not require Palm Tran to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden. Whenever feasible, requests for modifications should be made in advance. The request from the individual with a disability should be as specific as possible and include information on why the requested modification is needed in order to allow the individual to use Palm Tran's services.

Should you have any questions, concerns or if you believe you have been subjected to discrimination under Title VI or ADA, begin our complaint process by contacting:

Palm Tran

**Attn: Customer Services Administrator
3201 Electronics Way
West Palm Beach, FL 33407**

**Call: 877-930-4287
Email: PT-ADA@pbcgov.org
www.palmtran.org**

LIST OF LOCATIONS WHERE THE NOTICE TO THE PUBLIC IS POSTED

The Public Notification is posted in all buses, and Palm Tran's Rider's Guide, which includes the bus routes and schedules.

The notice can also be found at **Palm Tran's website:** <http://www.palmtran.org>

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Palm Tran's Mission is to provide access to opportunity for everyone; safely, efficiently and courteously.

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7/7

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Quick Links

- Next Bus Time
- NEW** Real Time Bus Information
- Fixed Route Service Changes & Detours
- Do Business with Us
- Fast Facts (FAQs)
- Palm Tran Rider's Guide
- Bus Pass Information
- Non-Discrimination Policy (English, Español, Creole)
- Discrimination Complaint form for Title VI and ADA
 - English
 - Español
 - Creole
- Lost and Found
- myStop Mobile for Android
- myStop Mobile for Apple
- Palm Tran Connection Eligibility Applications

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NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT**

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Modifications to Policies and Procedures: Palm Tran will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. The ADA does not require Palm Tran to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden. Whenever feasible, requests for modifications should be made in advance. The request from the individual with a disability should be as specific as possible and include information on why the requested modification is needed in order to allow the individual to use Palm Tran's services.

Should you have any questions, concerns or if you believe you have been subjected to discrimination under Title VI or ADA, you may contact us:

Call: 877-930-4287

Palm Tran
Attn: Public Information Supervisor
3201 Electronics Way
West Palm Beach, FL 33407

email: PT-ADA@pbcgov.org

How to File a Complaint: Your complaint should be made within 180 days from the date of the alleged discrimination and submitted to Palm Tran.

Your written complaint should include the following information:

1. Your name.
2. Your address and information as to how Palm Tran should contact you (e.g., your telephone number, e-mail address, home address, etc.).
3. A description of the discriminatory act or incident(s). You should describe how, why, when and where you believe you were discriminated against and provide the location, names and contact information of any witnesses.
4. You must sign your complaint. Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Please identify any other individuals who were involved or observed the incident. Be sure to explain how other persons were treated differently from you.

Palm Tran strives to promptly investigate complaints. Palm Tran will address any complaint indicating a failure on Palm Tran's part to comply with Title VI or ADA, and will endeavor to notify the complainant of the action it proposes or will take to resolve the complaint. Complaints which do not suggest a failure to comply with Title VI/ADA or which lack sufficient information to address, may be closed by Palm Tran.

**TÍTULO VI GARANTÍA DE LOS DERECHOS CIVILES
LEY PARA PERSONAS CON DISCAPACIDADES (ADA)**

Palm Tran le notifica al público que tiene regulaciones que aseguran pleno cumplimiento con el Título VI del Acta de los Derechos Civiles de 1964 (Título VI) y la Ley para Personas con Discapacidades (ADA). Palm Tran está comprometida a asegurar que ninguna persona sea excluida de la participación en, o negado los beneficios de sus servicios, o sometida a discriminación debido a su raza, color u origen nacional (Título VI), o debido a una discapacidad (Ley ADA).

Modificaciones a Regulaciones y Procedimientos: Palm Tran hará modificaciones razonables a sus regulaciones y programas para asegurarse que personas con discapacidades tengan igual oportunidad de disfrutar de todos sus programas, servicios y actividades. La Ley ADA no requiere que Palm Tran acoja ninguna acción que cambie fundamentalmente la naturaleza de sus programas o servicios, o que imponga un costo administrativo o financiero excesivo. Cuando sea posible, peticiones para modificaciones deben hacerse por adelantado. La petición de una persona con discapacidades debe ser lo más específica posible y debe explicar por qué la modificación es necesaria para poder usar los servicios de Palm Tran.

Si tiene alguna pregunta o si se siente víctima de discriminación bajo el Título VI o ADA, contáctenos:

Llámenos: 877-930-4287

Correo Electrónico: PT-ADA@pbcgov.org

Palm Tran

Attn: Public Information Supervisor

3201 Electronics Way

West Palm Beach, FL 33407

Como someter una Queja: Su queja debe ser hecha dentro de 180 días de la fecha del incidente donde se alega discriminación y debe someterla a Palm Tran.

Su queja por escrito debe incluir la siguiente información:

1. Su nombre.
2. Su dirección e información de cómo Palm Tran debe contactarle (ejemplo: su número de teléfono, correo electrónico, dirección de casa, etc.).
3. Una descripción del incidente o acto(s) discriminatorio. Usted debe describir como, por que, cuando y donde usted cree que fue discriminado y proveer ubicación, nombres e información de contacto de testigos si los hay.
4. Usted debe firmar su queja. Por favor explique lo más claro posible que pasó, por qué usted cree que pasó, y como usted fue discriminado. Por favor identifique a cualquier otro individuo quien estuvo envuelto u observó el incidente. Asegúrese de explicar como otras personas fueron tratadas diferentes a usted.

Palm Tran se esfuerza en investigar quejas rápidamente. Palm Tran investigará cualquier queja que indique un fallo de parte de Palm Tran para cumplir con el Título VI o la Ley ADA, y se esforzará a notificar la acción tomada para resolver la queja. Quejas que no sugieran una falla en cumplir con el Título VI / ADA o que les falte suficiente información para ser investigadas pueden ser cerradas por Palm Tran.

CREOLE

TIT FEDERAL VI DWA SIVIL ASIRANS AVI SOU AMERIKEN KI ANDIKAPE ACT

Palm Tran avèk pwal bay avi piblik ke li se politik Palm Tran a asire konfòmite plen ak Tit VI nan lwa sou dwa Sivil 1964, ak Amerik yo avèk Disabilities Act (ADA). Palm Tran se angaje nan asire ke pa gen okenn moun se eskli nan patisipasyon nan, oswa refize benefis ki genyen nan sèvis li yo, oswa yo kapab sibi diskriminasyon sou baz ras, koulè, sèks oubyen orijin nasyonal oswa paske nan andikap yon moun.

Modifikasyon Règleman ak Pwosedi: Palm Tran pral fè tout modifikasyon rezonab sou politik yo ak pwogram nan pou asire ke moun ki gen andikap gen yon opòtinite egal a jwi tout nan pwogram li yo, sèvis ak aktivite. ADA a pa mande pou Palm Tran pran okenn aksyon ki ta fondamantalman chanje nati a nan pwogram li yo oswa sèvis, oswa enpoze okenn soufwans chay finansye oswa administratif. Chak fwa sa posib, demann pou modifikasyon ta dwe fè an davans. Demann lan soti nan moun nan ki gen yon andikap yo ta dwe detay espesifik otank posib epi yo genyen ladan enfòmasyon sou poukisa se modifikasyon yo mande a nesèsè yo nan lòd yo ki pèmèt moun nan yo itilize sèvis Palm Tran la.

Si ou ta gen nenpòt kesyon, enkyetid oswa si ou kwè ou te viktim diskriminasyon anba Tit VI oswa ADA, ou kapab kontakte:

Rele noun an: 877-930-4287
Imèl: PT-ADA@pbcgov.org

Palm Tran
Attn: Sipèvizè Enfòmasyon Piblik
3201 Elektwonik Way
West Palm Beach, FL 33407

Kouman Pou pote yon plent: plent ou ta dwe fè nan 180 jou sou dat ki sou diskriminasyon nan swadizan epi soumèt bay Palm Tran.

Plent ekri ou a ta dwe gen ladan enfòmasyon sa yo:

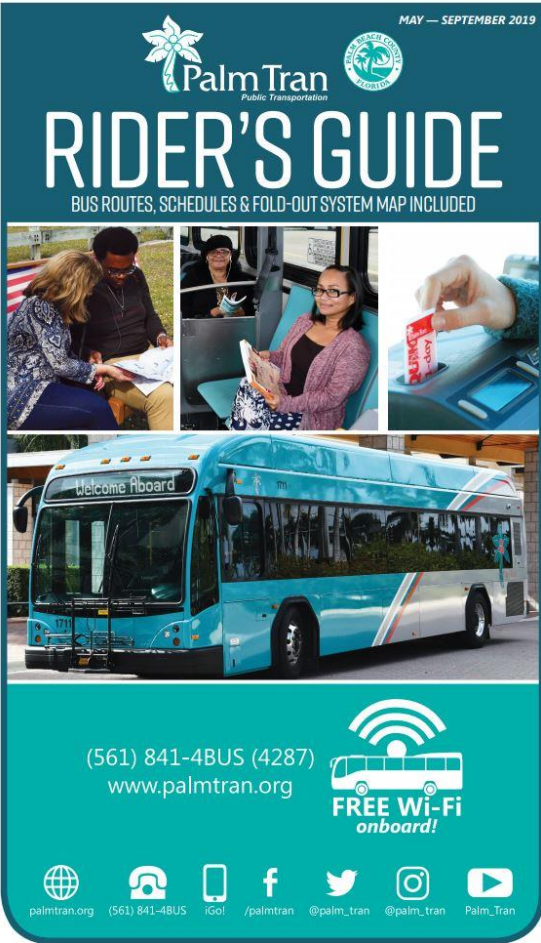
1. Non ou.
2. Adrès ou ak enfòmasyon; epi di kòman Palm Tran dwe kontakte ou (egzanp, nimewo telefòn, adrès imèl ou, adrès lakay ou, elatriye).
3. dekritèren diskriminatwa lwa a, ni incident(s). Ou ta dwe ka esplike ki jan, poukisa, ki lè ak ki kote ou kwè yo te fè diskriminasyon kont ak kote yo ye a, se non ak kontak enfòmasyon yon temwen.
4. Ou dwe siyen plent ou a. Tanpri eksplike byen klè ki posib sa ki te pase, poukisa ou kwè li te rive, ak ki jan yo te fè diskriminasyon kont ou. Tanpri idantifye nenpòt lòt moun ki te enplike oswa obsève ensidan an. Asire ou ke ou eksplike kouman lòt moun yo te trete yon fason diferan nan men ou.

Palm Tran fè efò yo san pèdi tan mennen ankèt sou tout plent. Palm Tran pral adrese tout plent ki endike yon echèk sou pati Palm Tran a konfòme l avèk Tit VI oswa ADA, epi yo pral eseye pwoteje yo avize pote plent lan nan aksyon an li pwopoze oswa pral pran yo rezoud plent lan. Plent ki pa sijere yon echèk konfòme l avèk Tit VI / ADA oswa ki manke ase enfòmasyon nan adrès, yo ka fèmen pa Palm Tran.

This format is used for display in all the buses.

PALM TRAN'S NON-DISCRIMINATION POLICY			REVISED JULY 2015
FEDERAL TITLE VI CIVIL RIGHTS ASSURANCE NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT	TÍTULO VI GARANTÍA DE LOS DERECHOS CIVILES LEY PARA PERSONAS CON DISCAPACIDADES (ADA)	TIT FEDERAL VI DWA SIVIL ASIRANS AVI SOU AMERIKEN KI ANDIKAPE ACT	
<p>Palm Tran hereby gives public notice that it is Palm Tran's policy to assure full compliance with Title VI of the Civil Rights Act of 1964 (Title VI), and the Americans with Disabilities Act (ADA). Palm Tran is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, or be subjected to discrimination on the basis of race, color, sex or national origin (Title VI) or because of an individual's disability (ADA).</p> <p>Modifications to Policies and Procedures: Palm Tran will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. The ADA does not require Palm Tran to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden. Whenever feasible, requests for modifications should be made in advance. The request from the individual with a disability should be as specific as possible and include information on why the requested modification is needed in order to allow the individual to use Palm Tran's services.</p>	<p>Palm Tran le notifica al público que tiene regulaciones que aseguran pleno cumplimiento con el Título VI del Acta de los Derechos Civiles de 1964 (Título VI) y la Ley para Personas con Discapacidades (ADA). Palm Tran está comprometida a asegurar que ninguna persona sea excluida de la participación en, o negado los beneficios de sus servicios, o sometida a discriminación debido a su raza, color u origen nacional (Título VI), o debido a una discapacidad (Ley ADA).</p> <p>Modificaciones a Regulaciones y Procedimientos: Palm Tran hará modificaciones razonables a sus regulaciones y programas para asegurarse que personas con discapacidades tengan igual oportunidad de disfrutar de todos sus programas, servicios y actividades. La Ley ADA no requiere que Palm Tran acoja ninguna acción que cambie fundamentalmente la naturaleza de sus programas o servicios, o que imponga un costo administrativo o financiero excesivo. Cuando sea posible, peticiones para modificaciones deben hacerse por adelantado. La petición de una persona con discapacidades debe ser lo más específica posible y debe explicar por qué la modificación es necesaria para poder usar los servicios de Palm Tran.</p>	<p>Palm Tran avèk pwal bay avi piblik ke li se politik Palm Tran a asire konfòmite plen ak Tit VI nan lwa sou dwa Sivil 1964, ak Amerik yo avèk Disabilities Act (ADA). Palm Tran se angaje nan asire ke pa gen okenn moun se eskli nan patisipasyon nan, oswa refize benefis ki genyen nan sèvis li yo, oswa yo kapab sibi diskriminasyon sou baz ras, koulè, sèks oubyen orijin nasyonal oswa paske nan andikap yon moun.</p> <p>Modifikasyon Règleman ak Pwosedi: Palm Tran pral fè tout modifikasyon rezonab sou politik yo ak pwogram nan pou asire ke moun ki gen andikap gen yon opòtinite egal a jwi tout nan pwogram li yo, sèvis ak aktivite. ADA a pa mande pou Palm Tran pran okenn aksyon ki ta fondamantalman chanje nati a nan pwogram li yo oswa sèvis, oswa enpoze okenn soufwans chay finansye oswa administratif. Chak fwa sa posib, demann pou modifikasyon ta dwe fè an davans. Demann lan soti nan moun nan ki gen yon andikap yo ta dwe detay espesifik otank posib epi yo genyen ladan enfòmasyon sou poukisa se modifikasyon yo mande a nesèse yo nan lòd yo ki pèmèt moun nan yo itilize sèvis Palm Tran la.</p>	
<p>Should you have any questions, concerns or if you believe you have been subjected to discrimination under Title VI or ADA, begin our complaint process by contacting:</p> <p>Palm Tran Attn: Public Information Supervisor 3201 Electronics Way West Palm Beach, FL 33407</p> <p>Call: 877-930-4287 Email: PT-ADA@pbcgov.org www.palmtran.org</p>	<p>Si tiene alguna pregunta, duda o si cree que ha sido sujeto a discriminación bajo el Título VI o ADA, comience el proceso de queja comunicándose con:</p> <p>Palm Tran Attn: Public Information Supervisor 3201 Electronics Way West Palm Beach, FL 33407</p> <p>Llámenos: 877-930-4287 Correo Electrónico: PT-ADA@pbcgov.org www.palmtran.org</p>	<p>Si ou konsene, oubyen si ou genyen yon kesyon oubyen si yo fe diskriminasyon avew anba lalwa Title VI ou ADA, kontakte nou:</p> <p>Palm Tran Attn: Public Information Supervisor 3201 Electronics Way West Palm Beach, FL 33407</p> <p>Rele noun nan: 877-930-4287 Imèl: PT-ADA@pbcgov.org www.palmtran.org</p>	

This is the format used for the Rider's Guide.



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Palm Tran's Non-Discrimination Policy

Federal Title VI Civil Rights Assurance Notice under the Americans with Disabilities Act

Palm Tran hereby gives public notice that it is Palm Tran's policy to assure full compliance with Title VI of the Civil Rights Act of 1964 (Title VI), and the Americans with Disabilities Act (ADA). Palm Tran is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, or be subjected to discrimination on the basis of race, color, sex or national origin (Title VI) or because of an individual's disability (ADA).

Modifications to Policies and Procedures: Palm Tran will make reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. The ADA does not require Palm Tran to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden. Whenever feasible, requests for modifications should be made in advance. The request from the individual with a disability should be as specific as possible and include information on why the requested modification is needed in order to allow the individual to use Palm Tran's services.

Should you have any questions, concerns or if you believe you have been subjected to discrimination under Title VI or ADA, begin our complaint process by contacting:

**Palm Tran • Attn: Public Information Supervisor
3201 Electronics Way • West Palm Beach, FL 33407
Call: 877-930-4287 • Email: PT-ADA@pbcgov.org • www.palmtran.org**

Política de No Discriminación de Palm Tran

Título VI Garantía de los Derechos Civiles Ley para personas con discapacidades (ADA)

Palm Tran le notifica al público que tiene regulaciones que aseguran pleno cumplimiento con el Título VI del Acta de los Derechos Civiles de 1964 (Título VI) y la Ley para Personas con Discapacidades (ADA). Palm Tran está comprometida a asegurar que ninguna persona sea excluida de la participación en, o negado los beneficios de sus servicios, o sometida a discriminación debido a su raza, color u origen nacional (Título VI), o debido a una discapacidad (Ley ADA).

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**Palm Tran • Attn: Public Information Supervisor
3201 Electronics Way • West Palm Beach, FL 33407
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Palm Tran's Pa fè diskriminasyon politik Tit Federal VI Dwa Sivil Asirians Avi sou American ki andikape Act

Palm Tran avèk pwal bay avi piblik ke li se politik Palm Tran a asire konfòmite plen ak Tit VI nan lwa sou dwa Sivil 1964, ak Amerik yo avèk Disabilities Act (ADA). Palm Tran se angaje nan asire ke pa gen okenn moun se eskli nan patisipasyon nan, oswa refize benefis ki genyen nan sèvis li yo, oswa yo kapab sibi diskriminasyon sou baz ras, koulè, sèks oubyen orijin nasyonal oswa paske nan andikap yon moun.

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3201 Electronics Way • West Palm Beach, FL 33407
Rele noun nan: 877-930-4287 • Imèl: PT-ADA@pbcgov.org • www.palmtran.org**

TITLE VI COMPLAINT PROCEDURES - for the Public

The notice to the public reads:

Should you have any questions, concerns or if you believe you have been subjected to discrimination under Title VI or ADA, begin our complaint process by contacting:

Palm Tran

**Attn: Customer Services Administrator
3201 Electronics Way
West Palm Beach, FL 33407**

**Call: 877-930-4287
Email: PT-ADA@pbcbgov.org
www.palmtran.org**

How to File a Complaint: Your complaint should be made within 180 days from the date of the alleged discrimination and submitted to Palm Tran.

Your written complaint should include the following information:

1. Your name.
2. Your address and information as to how Palm Tran should contact you (e.g., your telephone number, e-mail address, home address, etc.).
3. A description of the discriminatory act or incident(s). You should describe how, why, when and where you believe you were discriminated against and provide the location, names and contact information of any witnesses.
4. You must sign your complaint. Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Please identify any other individuals who were involved or observed the incident. Be sure to explain how other persons were treated differently from you.

Palm Tran strives to promptly investigate complaints. Palm Tran will address any complaint indicating a failure on Palm Tran's part to comply with Title VI or ADA, and will endeavor to notify the complainant of the action it proposes or will take to resolve the complaint. Complaints which do not suggest a failure to comply with Title VI/ADA or which lack sufficient information to address, may be closed by Palm Tran.

TITLE VI COMPLAINT PROCEDURES – Palm Tran

POLICY:

It is the policy of Palm Tran to ensure compliance with Title VI requirements and guidelines for Federal Transit Administration (FTA) recipients. The policies and procedures described here are in accordance with the requirements established by the October 1, 2012 FTA Circular 4702.1B, based on 49 CFR Part 21, Title VI regulations.

PROCEDURES:

I. Investigating Fixed Route Title VI Complaints

It is the policy of Palm Tran to ensure that no customer is denied service based on any one of the protected classifications identified under Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Palm Tran may file a Title VI complaint by contacting our Customer Service Center or by mailing in our Discrimination Complaint Form.

Palm Tran will investigate complaints received no more than one hundred and eighty (180) calendar days after the alleged incident. The Complaining Party (CP) will receive an acknowledgement letter confirming that the complaint was received and will be investigated. Palm Tran has thirty (30) business days to investigate, and validate the complaint. If more information is needed to resolve the case, Palm Tran may contact the CP. The CP has 14 business days from the date of the letter from Palm Tran requesting additional information to send the requested information to the Palm Tran investigator assigned to the case. If the investigator is not contacted by the CP or does not receive the additional information within 14 business days, Palm Tran can administratively close the case. A case can be administratively closed also if the CP no longer wishes to pursue their case.

At the conclusion of the investigation, the CP will receive one of two letters: A Closure Letter (CL) or a Letter of Finding (LOF). A CL will summarize the allegations and state that there was not a Title VI violation and that the case will be closed. An LOF will summarize the allegations and the interviews, explain whether any disciplinary action was taken, detail any follow-up training required for the staff member(s) and any other action that will occur.

1. It shall be the responsibility of the Customer Service Supervisor to classify Title VI customer complaints as 'priority' and forward them to the Customer Service Administrator and Operations Director for processing and investigation.

2. It shall be the responsibility of the Customer Service Administrator to coordinate all correspondence with the CP, including, but not limited to the Notification of Investigation and Closure Letter if no finding is made. The Customer Service Administrator shall also be responsible for coordinating delivery of the Title VI Complaint form if it has not already been obtained by the CP.

- a. The Notification of Investigation will be sent within five (5) business days of Palm Tran's receipt of the complaint from the CP, acknowledging receipt of the complaint and confirming that the complaint will be investigated.

- b. Investigations will typically be completed within ten (10) business days of Palm Tran's receipt of a validated complaint from the CP. A determination of the course of action, if any, should be completed within thirty (30) business days.

c. The Closure Letter will be sent to the Complaining Party within five (5) business days of the close-out or completion of the investigation.

d. Requests for time extensions to complete an investigation or reach a determination will be directed to the Customer Service Administrator and granted as needed.

3. It shall be the responsibility of the Customer Service Administrator and Operations Director to coordinate all aspects of the investigation, including but not limited to interviews with staff members and review of audio/video or other evidence.

4. It shall be the responsibility of the EEO Officer to coordinate delivery of a Letter of Finding (LOF) to the CP when discrimination complaints are substantiated. The LOF will be sent to the CP within five (5) business days of the completion of the investigation.

II. Tracking Fixed Route Title VI Complaints

It is the policy of Palm Tran to ensure compliance with tracking requirements for Title VI investigations, complaints and lawsuits.

1. It shall be the responsibility of the Customer Service Administrator to track Title VI complaints in the COM system. Quarterly reports shall be sent to the Director of Support Services for reconciliation.

2. It shall be the responsibility of Customer Service Administrator to track Title VI investigations and lawsuits. The list shall include the date the investigation commenced or lawsuit was filed, a summary of the allegation and the status of the investigation or lawsuit. This list shall be included in the Title VI Program Update submitted to FTA every three (3) years.

III. Public Access to Fixed Route Title VI Procedures

It is the policy of Palm Tran to ensure that the Discrimination Complaint form and procedure for filing a complaint are available to the public through our website.

1. It shall be the responsibility of the Information Technology Manager to publish the Discrimination Complaint form procedure for filing a complaint to Palm Tran's Internet website (www.palmtran.org)
2. It shall be the responsibility of the Marketing Manager to publish Palm Tran's Non-Discrimination Policy in the Rider's Guide.
3. It shall be the responsibility of the Maintenance Manager to post Palm Tran's Non-Discrimination Policy in all buses, and new buses as acquired.

TITLE VI COMPLAINT FORM

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 following pages have the complaint form forwarded to anyone who contacts Palm Tran by phone with a complaint of discrimination because of their race, color, or national origin.

Palm Tran customers can also access this form on our website at:

<http://www.palmtran.org>

The form is available in English, Spanish, and Creole.



Discrimination Form

(Telephone number varies from Department to Department)

Case Number _____

Note: We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know. If you are not able to complete the form personally, Palm Tran's Public Information Supervisor will assist you to do so at a mutually convenient time. Simply call _____ to make your request. If the Public Information Supervisor assists you in completing the form, you will still need to sign it to validate the information provided.

Are you filing this complaint on your own behalf? **YES** ☐ **NO** ☐

(If you answered YES to this question, go to item **2**. If you answered NO to this question, go to item **1**.)

1. Please provide the name of the person for whom you are complaining:

Name of complainant _____

Street Address _____

City, State and Zip Code _____

Telephone Number – home (____) _____ business (____) _____

2. Information about the Person discriminated against

Name _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (____) _____

3. What is the name and location of the person/department that you believe discriminated against you?

Name _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (____) _____

4. Which of the following best describes the reason you believe discrimination took place? Was it because of your:



a. Race, Color, National Origin ☐

b. Disability ☐

c. Other ☐

What date did the alleged discrimination take place?

(Must be within the past 180 days)

5. In your own words, describe the alleged discrimination. Explain what happened, and whom you believe was responsible. Be sure to include how other persons were treated differently than you.

(Use more sheets or the back of this page, if needed)

6. (For internal complaints only) Have you tried to resolve this complaint through internal grievance procedures at Palm Tran? YES ☐ NO ☐

(If you answered NO to this question, go to item 8.)

If yes, what is the status of the grievance?

Name and title of the person who is handling the grievance procedure.

Name _____ Title _____

7. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? (If NO please go to item 10)

NO ☐



If yes, check all that apply: Federal agency _____ Federal court _____ State court
_____ State agency _____ Local agency _____

8. Please provide information about a contact person at the other agency/court where the complaint was filed.

Name _____

Street Address _____

City, State, and Zip Code: _____

Telephone Number (_____) _____

9. Have you previously filed a discrimination complaint with Palm Tran before?

YES ☐ NO ☐

If yes, when? Date _____

10. Have you filed any other discrimination complaints with Palm Tran?

YES ☐ NO ☐

If yes, when and against whom were they filed?

Date _____

Agency _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (_____) _____

11. Please sign and date this form below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date

If this form was completed by someone other than the complainant, please provide information about who assisted the citizen with this document and why.

Please submit this form to: Palm Tran – Attention: Customer Service Administrator Discrimination Complaint, 50 S Military Trail, Suite 101, West Palm Beach, FL 33415 (561) 812-5351

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Palm Tran closely monitors the customer service phone line, and has detailed procedures to follow up on all complaints.

All calls are classified and sent to the appropriate department for immediate action and follow up. While there are calls that are classified as Title VI complaints (calls alleging discrimination), after proper investigation two complaints have been validated as a Title VI violation.

Palm Tran/Palm Beach County has no records of lawsuits alleging Title VI violations in years 2017, 2018 and 2019 (to date).

The following pages list the complaints classified as Title VI at the time the caller contacted Palm Tran, the follow-up information and the outcome of the investigation.

**TITLE VI
COMPLAINT TRACKING LOG**

NAME	TRACKING #	DATE RCVD	COMPLAINT	UPDATE
King, Marine	123213	3/14/17	Race discrimination	Title VI acknowledgement letter and forms mailed to passenger on 3/27/17. No completed forms received back from passenger. Complaint was investigated and deemed invalid. Finding letter sent on 3/20/17. CLOSED.
Adair, Cindianne	124397	5/12/17	Race discrimination	Title VI acknowledgement letter and forms mailed on 5/15/17. Complaint was investigated and deemed invalid. Finding letter was mailed on 6/05/17. CLOSED.
Verno, Anthony	130793	2/14/18	Race discrimination	Complaint was investigated and deemed invalid. CLOSED.
Vieira, Catarina	132472	3/23/18	Race discrimination	Complaint was investigated and deemed valid. Title VI valid feedback prepared if passenger calls back. Operator was sent to Title VI training. CLOSED.
Jacques-Nedd, Marie	132471	3/23/18	Race discrimination	Complaint was investigated and deemed valid. Title VI feedback prepared if passenger calls back. Operator was sent to Title VI training. CLOSED.

Lime, Ashley	133220	4/25/18	Race discrimination	Complaint was investigated and deemed invalid. Finding letter mailed on 5/3/18. CLOSED.
Iverson, Xavier	133419	5/3/18	Race discrimination	Complaint was investigated and deemed invalid. No finding letter sent because passenger did not provide his address. CLOSED.
Johnson, Willie	134302	6/21/18	Race discrimination	Complaint was investigated and deemed invalid. Title VI packet could not be mailed because passenger did not provide his address. Title VI feedback prepared if passenger calls back. CLOSED.
Concerned Citizen	135454	8/24/18	Race discrimination	Complaint was investigated and deemed not valid. No address was provided by passenger to send Title VI correspondence. CLOSED.
Kay, Mary	135092	8/08/18	Race discrimination	Title VI acknowledgement letter and forms mailed on 8/21/18. Complaint was investigated and deemed not valid. Passenger did not complete the Title VI forms. CLOSED.

Elliott, Kenneth	135136	8/10/18	Race discrimination	Complaint was investigated and deemed not valid. Title VI forms were not mailed because the passenger did not provide an address. CLOSED.
Finnegan, Nynoshka	136253	9/26/18	Race discrimination	Title VI acknowledgement letter and forms were mailed on 9/28/18. Complaint was investigated and determined not valid. Letter of findings sent to passenger on 10/03/18. CLOSED.
Gail, Quero-Barragan	138166	12/20/18	Race discrimination	Title VI and forms were mailed on 1/03/19. Complaint was investigated and ruled not valid. Letter of findings was sent on 1/03/19. CLOSED.

PUBLIC PARTICIPATION PLAN

INTRODUCTION

This Public Participation Plan (PPP) was developed to ensure that prior to implementing adjustments to fares, services and routes of the Palm Tran Transit System, appropriate public comment is solicited and considered in accordance with applicable federal, state and local law and Palm Beach County Resolution No. 2015-0893, as it may be amended. This PPP also identified strategies and processes to ensure effective public and stakeholder notice and participation, as appropriate, in Palm Tran transportation planning activities.

The Palm Tran Service Board (PTSB) is authorized to hold public hearings and after considering public comment and any service equity analysis performed, approve Palm Tran fixed route service changes constituting major service changes. The PTSB is also authorized to approve changes to Palm Tran fixed routes that do not constitute major service changes after holding a public meeting and considering public comment, except that the PTSB does not have the authority to approve any service change(s), including major service changes, for which there will be an increase in the cost of services. In all other respects the PTSB is an advisory body to the Palm Beach County Board of County Commissioners (BCC).

Notwithstanding anything contained in this Program Update, the BCC has the authority to conduct public hearings, consider public comments, review and approve service and fair equity analysis (for both minority and low-income populations) and to make final decision(s) regarding fare and service changes. The BCC also has the authority to hold public meetings and consider public comments regarding service change that are not major service changes, as it deems appropriate. A “formal” public hearing need to be held for service changes that do not constitute a major service change.

The PTSB makes recommendations and provides advice when requested by the BCC, the Palm Beach County Administrator or the Palm Tran Executive Director. While the PTSB may make recommendations and provide advice when requested, the authority to approve Palm Tran policies and procedures is vested in the BCC, excluding matters vested in the County Administrator or the Palm Tran Executive Director.

Sound policy and service delivery decisions need to take into consideration community sentiment and public opinion based on well-executed outreach efforts. The public outreach strategies described herein are designed to provide the public with effective access to information about Palm Tran’s fixed route bus and paratransit service and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to service or fares.

Palm Tran also recognizes the importance of many types of stakeholders in decision-making processes, including other units of government, the Transportation Planning Agency (MPO), Community Based Organizations (CBOs), major employers, passengers and the general public, including its low income, minority and Limited English Proficiency (LEP) members.

Public Participation Program Principles

Palm Tran's Public Participation Program will be governed by a set of principles. While the guidelines may be adjusted or revised to respond to external influences or needs, the principles will remain sound. They are:

Public involvement shall:

- Be early and continuous
- Provide for full public involvement and access to key decisions
- Provide a process for seeking out and considering the needs of traditionally underserved groups
- Provide for periodic evaluation for effectiveness
- Be requested with the publication of legal notices and public hearings (as required) to obtain public input regarding transportation projects
- Be accessible, every effort will be made to enhance the accessibility of the public's participation - physically, geographically, temporally, linguistically and culturally
- Be clear, focused, understandable and relevant
- Ensure reasonable public access with the use alternative tools to allow for public participation, these can range from telephone hotlines, websites, printed material, and providing addresses for public comment on proposed plans of action, as well as distributing multi-lingual publications.
- Make use of Smaller Information Group Meetings and Discussions –People feel more comfortable asking questions and expressing their concerns in a smaller, informal meeting than a large public forum.

Palm Tran Service Board (PTSB)
PTSB - Paratransit Subcommittee

PTSB - Planning Subcommittee

The PPP endeavors to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low income, minority and LEP groups, to comment, as appropriate and as required by applicable law, on proposed adjustments to fares, services and routes of the Palm Tran System.

METHODS FOR ACHIEVING PUBLIC PARTICIPATION AND PROVIDING NOTICE AND GENERATING AWARENESS ABOUT COMMUNITY MEETINGS AND PUBLIC HEARINGS

The methods of public participation included in this PPP were developed based on best practices employed by other leading public transportation systems in the country and guidance provide by publication from the Federal Transit Administration (FTA).

Palm Tran intends to achieve meaningful public participation by a variety of methods with respect to changes to Palm Tran service, and/or fare changes. These include Public Hearings, Public Notices, and alternative methods to gather public comment from those unable to participate in the public hearings.

Palm Tran in developing the Transportation Development Plan (TDP) has already and will in the future also conduct other types of Community Meetings and Listening Sessions as appropriate with passengers, employers, CBOs, and Advisory Committees to gather public input and distribute information about service quality, proposed changes or new service options.

In addition, the public will be invited at all times to provide feedback via Palm Tran's Facebook Page, and during operating hours at the Customer Service Line, all feedback collected is recorded and passed on to the Palm Tran management team, and responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment to service, routes or fares. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comment before implementing proposed adjustments to fares, route eliminations and major changes to service. In each case, an agenda for each meeting will be created that works to achieve the stated goals but is relevant to and not overwhelming for the public.

For all public meetings and hearings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For Community Meetings and Public Hearings, Palm Tran will use a variety of means to make riders and Palm Beach County residents aware that the meetings/hearings are taking place, including some or all of the following methods:

- In-bus Advertisements
- Postings and information on Palm Tran's Website

PTSB - Planning Subcommittee

- Notices on major media outlets
- Flyers and Information distribution through various libraries, universities and civic organizations that currently help distribute our timetables and information
- Postings on the County website

All major printed and website information and materials that communicate proposed and actual service adjustments will be provided in English, Spanish and Creole. Spanish is by far the most predominant non-English language in Palm Beach County, and Creole has been identified as the second predominant non-English language in Palm Tran riders.

The PPP endeavors to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low income, minority and LEP groups, to comment, as appropriate and as required by applicable law, on proposed adjustments to fares, services and routes of the Palm Tran System.

PUBLIC HEARINGS

Under this PPP a formal public hearing will be conducted in the following circumstances:

1. When a fare increase for Palm Tran services is proposed

No Fare Increases have been proposed since September 2013

2. When a change in fare media for Palm Tran services is proposed

No change in fare media for Palm Tran services have been proposed since September 2013.

3. When a Major Service Change is proposed

Palm Tran implemented a Major Service Change, entitled the Route Performance Maximization (RPM), on September 30, 2018.

A public hearing was held at the August 14, 2018 Board of County Commissioners Meeting for the RPM and at the June 28, 2018 Palm Tran Service Board meeting.

All RPM public outreach efforts and public hearing notices are listed in Appendix A.

5. When the Title VI Program is updated

The 2019 Title VI update was presented and a public hearing was held at the July 25, 2019 Palm Tran Service Board Meeting. The Title VI update will be submitted for approval to the Board of County Commissioners on September 10, 2019. All Title VI meeting and public hearing documents are attached in Appendix B.

Such Public Hearings will be noticed and conducted in accordance with the following procedures and practices:

- 1. Notice of Public Hearing** – Public notice of the Hearing date, time and location will be provided at least ten (10) days before the scheduled date for the hearing. Notice shall be advertised using a variety of the methods provided above including, at a minimum, on Palm Tran's website and in newspapers with countywide distribution including Spanish and Creole Language publications, should no Creole publications exist, Palm Tran will advertise in Creole Radio Broadcasting Station if one is available for announcements to the Creole speaking and public, and posting of the notice in the station's website.
- 2. Location of Public Hearings** – Hearings will be conducted in a location that is accessible to persons with disabilities and adequate in size and venue to accommodate the anticipated public attendance.
- 3. Receipt of Public Comments** – meetings will be formatted to accommodate written and verbal comment by the public with respect to the proposed fare, service and route adjustments. Specific rules and procedures regarding the timing and manner of providing comments will be as established and noticed by Palm Tran in advance of each Hearing.

Comments provided by the public at the hearing will be recorded. The public will have the opportunity to comment via phone, email or letter, as well as at the hearing.

4. **Consideration of Public Comment** - Comments received prior to the final public hearing will be consolidated and summarized by staff and presented to the Board (*i.e.*, the Board of County Commissioners or the Palm Tran Service Board) along with staff recommendations, in written or other form appropriate under the circumstances prior to final action. Following the conclusion of the final public hearing (*i.e.*, the last opportunity afforded to the public to engage in the decision-making process and provide comments), the Board will give due consideration to the information and recommendations received from staff and the relevant comments and supporting information received from the public, attaching the weight and value it deems proper to such comments, information and recommendations. In doing so, it will take into account the knowledge and expertise of the commenter, to the extent it has information regarding such, supporting facts, research and data received, expert opinions proffered, and the reasons provided from those in support of or in opposition to the proposed action. The Board's determination may not be based simply upon the number of comments in support of or in opposition to the proposed action but rather whether its decision will reasonably further a desired outcome or policy objective. The Board may consider alternatives to the proposed action or no action at all, as it deems appropriate.

LANGUAGE ASSISTANCE PLAN FOR INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP) FOR PALM TRAN

INTRODUCTION

Palm Tran's fixed-route network includes a 32 route network and provides connections to the County's multimodal transportation network; to its main hub, the West Palm Beach Intermodal Center, as well as its major transfer locations. Major transfer locations include Wellington Mall, West Palm Beach VA Medical Center, Boca Town Center Mall, and Gardens Mall as well as the six Tri-Rail stations in the County. Palm Tran Connection, Palm-Tran's shared-ride, door-to-door paratransit service, provides transportation for disabled residents and visitors in Palm Beach County. Service is provided under three programs-Americans with Disabilities (ADA) Program, Division of Senior Services (DOSS) and the Transportation Disadvantaged Program (TD). Palm Tran Connection travels in Palm Beach County from Jupiter to Boca Raton and from Palm Beach to South Bay. Palm Tran also provides connections to its partner agency to the south, Broward County (BCT) at Camino Real via routes 1, 92, and 94 as well as at Sandalfoot Plaza, which are both located in the Greater Boca area. Transfers to Palm Tran's northern neighbor system, Marty/Martin County Transit, are available at Gardens Mall in Palm Beach Gardens. Palm Tran also provides services in the Glades region through the Go Glades flex system, a circulator-style pilot program that started in December 2018. The flex service serves the communities of Belle Glade, South Bay, and Pahokee. In addition, the flex system will include the implementation of a Dial-a-Ride (DAR) available to the general public and ADA customers. The Glades region is also served by fixed-route 47. Palm Tran fixed-route 40 connects the Glades region with the rest of the County.

In providing fixed-route service within a service area of 1,471,150 residents, Palm Tran understandably has interactions with individuals with varying degrees of ability to speak and/or understand English. For this reason, Palm Tran has developed this Limited English Proficiency (LEP) plan. Additionally, the LEP plan has been prepared to address Palm Beach County's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills.

Individuals, who have a limited ability to read, write, speak or understand English are Limited English Proficient or "LEP". In the Palm Tran service area, there are 172,848 residents or 12.23% that describe themselves as not able to communicate in English very well (Source: 2017 American Community Survey). Palm Beach County is federally mandated (executive order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Palm Tran has utilized the U.S. Department of Transportation's (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LEP plan.

The U.S. Department of Transportation handbook, titled *"Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007)"* (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d

et seq., and its implementing regulations provide that 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (*Handbook, page 5*).

The *Handbook* further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (*Handbook, page 5*).

Executive Order 13166 of August 11, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (*Handbook, page 6*). Additionally, recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP. (*Handbook, page 6*)

These provisions are included in *FTA Circular C 4702.1B* in Section 9 of Chapter III (pages III-6 -- III-9).

For many LEP individuals, public transit is the principal transportation mode used. It is important that Palm Tran be able to communicate effectively with all of its riders, both LEP and non-LEP individuals alike. When Palm Tran is able to communicate effectively with all of its customers, the service provided is a safer, more reliable, convenient and accessible service for all of the agency's customers. For these reasons, Palm Tran is committed to taking those reasonable steps to ensure meaningful access for LEP individuals to this agency's services.

This Plan will demonstrate the efforts that Palm Tran has undertaken to make its service as accessible as possible to all persons irrespective of their ability to communicate using the English language. More specifically, the plan addresses how services will be provided through general guidelines and procedures:

- **Identification:** Identifying LEP populations and LEP services in County departments
- **Interpretation:** Offering free and timely interpretation to LEP individuals upon request
- **Translation:** Providing free and timely translation of vital Palm Tran documents
- **Staffing:** Identifying Palm Tran employees to meet LEP customer service needs
- **Training:** Delivering training on LEP service mandates to all responsible employees

Additionally, Palm Tran does welcome any comments or suggestions that would further improve the effectiveness of this Plan and/or our ability to communicate more effectively with our customers.

Four Factor Analysis

In determining "reasonable steps" there are four factors to be considered:

1. The number and proportion of LEP persons in the eligible service area;

2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

The US DOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in Palm Tran's service area in relation to the transportation planning process.

1. The Number and Proportion of LEP Persons in the Eligible Service Area.

For Palm Tran the first step towards understanding the profile of individuals that compose our service area in Palm Beach County is a review of 2017 American Community Survey Data.

The table below displays the primary language and number of individuals 5 years and over that speak English "not well" or "not very well" at home. Only the top four language groups for Palm Beach County are displayed.

At this time, Spanish represents a significant percentage of the region's population.

	Population	Percentage
Palm Beach County, Florida	1,395,492	100%
Population Speak English less than "very well"		
Primary Language at Home		
Spanish	119,369	8.55%
French Creole	42,188	3.02%
Portuguese	6,461	0.46%
French (incl. Patois, Cajun)	4,830	0.34%

2. The Frequency with which LEP Persons Come in Contact with The Program.

The growing size of the LEP population in Palm Beach County increases the probability of its contact with Palm Tran. Palm Tran assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying riders and drivers. Palm Tran has assessed the need of LEP individuals since October 2005. As of that date, Palm Tran has not had requests for interpreters for any public meetings. Prior to 2005, Palm Tran already included a Spanish translation of the informative facts provided in the system wide guide: "Riders Digest" and now includes a Creole translation. Since 2005, there has been no request for translated Palm Tran documents.

Palm Tran's prior experience with limited English proficient persons has been primarily with Spanish speakers. A review of the call center data determined that 4.02%% of the calls for Paratransit reservations chose the option for Spanish and 0.63% chose the option for Creole. A review of call center data for customer-service related calls for both fixed-route and paratransit determined that 3.7% chose the option for Spanish and 0.9% chose the option for Creole. A survey of the call center personnel determined that calls from speakers other than English/Spanish are sporadic, with the prevailing additional language being Creole. However, a survey of walk-in traffic at Palm Tran Connection, in the area that processes the Transportation Disadvantaged (TD) passes (discounted monthly passes for Fixed Route), it was noted that 17% of the customers needed assistance in Creole while 23% needed assistance in Spanish.

3. The Importance of the Service Provided by the Program.

On-Board surveys conducted to develop the 2017-2026 Transportation Development Plan (TDP) asked the riders questions to determine how important Public Transportation is to them. Most surveyed riders had lower annual incomes and ride Palm Tran because they do not have a car available (41%). Most indicated that they ride Palm Tran to get to work (49%), and are dependent on Palm Tran fixed-route service for transportation.

Examining the trip purpose distribution further confirmed the importance of transit services to the community. Palm Tran bears in mind that transportation is considered an essential service to participation in modern society. While the surveys did not identify a considerable number of LEP riders, Palm Tran must consider general observation made by others (State of California and New Jersey), that the LEP population tends to be truly captive transit riders because they can't drive, don't have a driver's license, or simply can't afford a car. The California and New Jersey reports also indicate that the transit services are not only important to the LEP group, but in some cases, it may be absolutely critical, that is, without the bus services or whatever the current transit mode he or she is using, the LEP person may not have access to basic employment or the necessities of life.

4. The Resources Available to the Recipient.

Palm Tran already uses its staff as the primary resource for LEP assistance. Route schedule materials available to the public are provided in Spanish and Creole, translations are completed by Palm Tran's staff. The call center provides an option to select Spanish and Creole from the menu. Front desk staff have the option to contact a staff member should an LEP individual require assistance at the front desk. The Paratransit reservation center now has 3 members of staff that are fluent in Creole.

Not all communications are translated, Palm Tran has targeted vital documents that will allow LEP individuals full participation in the benefits provided by the public transportation system.

Meeting the Requirements: Palm Tran Limited English Proficiency Plan

Based on the current levels of residents with Limited English Proficiency in Palm Beach County and their interaction with Palm Tran as the provider of Public Transportation in the County, Palm Tran is committed to providing meaningful access to its services to LEP persons.

All language access activities detailed below will be coordinated by the Support Services Section.

Providing Notice to LEP Persons

Based on Palm Tran self-assessment of LEP persons that come in contact **with** its services, languages other than English should be used in all notices and publications that refer to public transportation services. This information should be provided in a notice in a language LEP persons will understand.

Some notification ideas include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (Public Hearing Notices) that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Using a telephone voice mail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English.
- Providing notices in non-English language radio and television stations about the availability of language assistance services for important events.
- Presentations and/or notices at schools and religious organizations for important events or where community involvement is critical.

Palm Tran will continue this assessment alongside the demographic analysis for Title VI, and this information will be revised if needed every three years.

Language Assistance Measures. Language assistance will be provided for some LEP individuals through the translation of some vital materials, as well as through oral language interpretation when necessary and possible.

Translation of written materials. Palm Tran currently provides vital publications with translations in Spanish and Creole. The continued self-assessment of LEP population will determine if additional languages will need to be added.

Staff training. In order to establish meaningful access to information and services for LEP individuals, employees in public contact positions and those who will serve as translators or interpreters will be properly trained. Such training will be developed to ensure that staff are fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals. Palm Tran management staff will be included in this training, even if they do not interact regularly with LEP persons, to ensure that they are fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff. Training of management staff will also include flexibility in allowing those employees who are fluent in other languages to assist the customer service staff when they encounter a customer who is LEP.

TABLE DEPICTING MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS SELECTED BY THE RECIPIENT (GENERAL REQUIREMENT)

Palm Tran Service Board

Members: 13 total (all are PBC residents and appointed by the BCC): two transportation representatives, an environmental advocate, a disability advocate, a business person, a senior citizen, a fixed-route bus user, a fixed-route bus operator, a certified paratransit user, a paratransit representative, a locally elected municipal official, a representative with multicultural experience, a representative of the Glades/Lake Region, and a citizen appointed at-large.

Purpose: To advise the BCC regarding Palm Tran's fixed-route and paratransit programs, to conduct public meetings and hearings regarding service changes, and provide an ongoing mechanism for the participation of individuals with and without disabilities in the development, implementation and assessment of all Palm Tran services.

Meetings: Fourth Thursday of the month, 1:30 p.m., Palm Beach County Vista Center, 2300 North Jog Rd., WPB

Liaison:

RoseAnn LaBella Voils
Public Relations Specialist
Palm Tran
(561) 841-4343

	Caucasian	Hispanic Latino	African American	Asian American	American Indian Native Hawaiian	Other Race
Palm Beach County Population	73.5%	22.3%	19.2%	2.7%	0.20%	2.3%
Palm Tran Service Board June 2018 11 of 13 seats are assigned	50%	0%	25%	0%	0%	25%

MONITORING PROCESS OF PALM BEACH COUNTY'S SUBRECIPIENTS FOR TITLE VI COMPLIANCE

Palm Beach County does not have any subrecipients for FTA grant funds.

SERVICE STANDARDS

Palm Tran strives to meet the needs of Palm Beach County transit dependent residents by providing efficient and economic public transportation services in keeping with our commitment to safety, quality and effectiveness.

Managing a public transit operation is a serious undertaking; therefore, having an outline of our standards and expectations, will guide our company in the right direction to achieve our goals as a transit provider. This document does not only outline how our system runs, but also assists us in staying consistent in providing quality and service to all the different areas we operate in.

Palm Tran has used service guidelines to develop optimal fixed route service configuration, to assess particular services, and to institute a foundation for evaluating service alternatives consistently and equitably. Palm Tran reports performance indicators, to the Service Board monthly to evaluate fixed route and paratransit service delivery.

Service standards guide the design and operation of a public transit organization. Service standards provide the rationale for making decisions on transit services and associated allocation of resources.

Four key measures that have the utmost influence on service design are: on-time performance, vehicle headway, vehicle loadings, and service availability.

MONITORING TRANSIT SERVICE

In order to ensure compliance with DOT's Title VI regulations, FTA requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years.

Transit providers shall assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies.

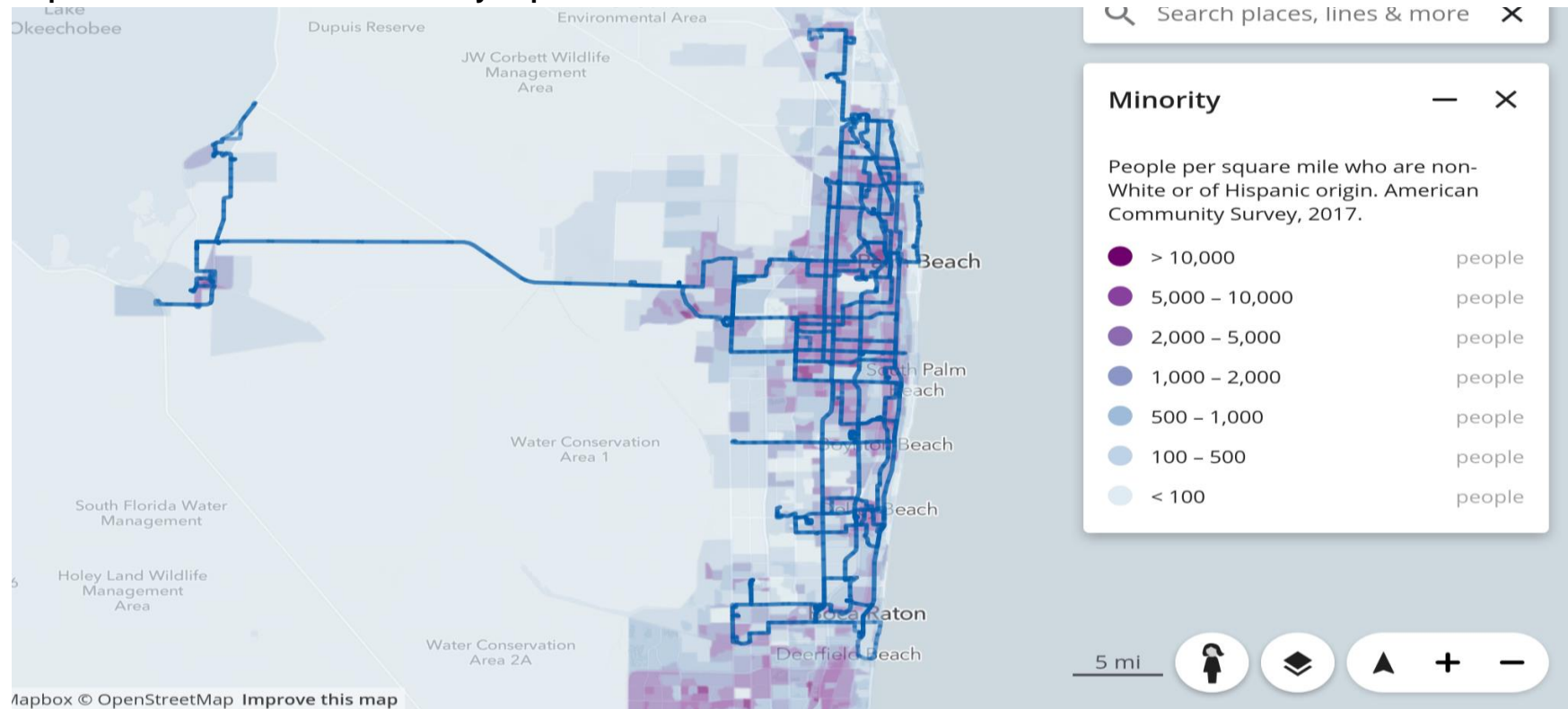
Minority transit routes are defined by FTA Circular 4702.B as any route that has at least one third of its total revenue mileage in a Census block, block group, or traffic analysis zone with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

Based on Palm Beach County's population, 26.5% of county residents are considered minority. All census blocks were identified in Palm Beach County where the minority population exceeds 26.5%, as shown below.

Palm Beach County Minority Population by Census Block

After identifying the distribution of minority population in the service area, all Palm Tran routes that operate at least one third of their revenue mileage in blocks with over 26.5% minority population were classified as Minority routes, and the remaining Palm Tran routes are identified as Non-Minority routes. Based on this analysis, 30 of Palm Tran's 32 routes are classified as Minority routes.

Map 1: Palm Tran Routes and Minority Population



Map 2: Palm Tran Minority (Blue Routes) vs Non-Minority Routes (Gold Routes)

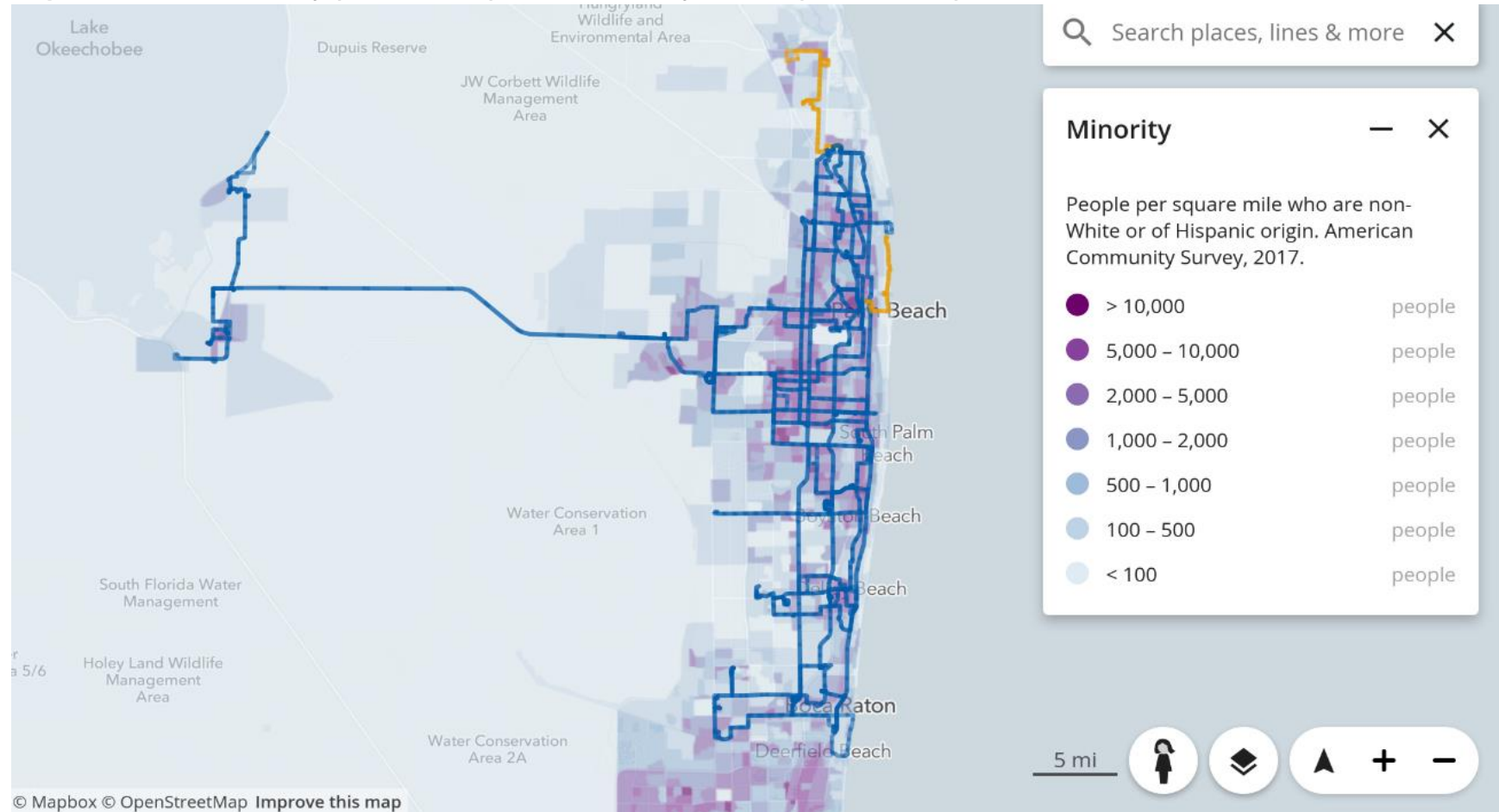


Table 1: Palm Tran Minority vs Non-Minority Routes

Route	Name	% Mileage in Minority Blocks	Minority Route
1	Route 1 Via U.S. 1 - PBG to Boca Raton	46.70%	Minority
2	Route 2 Via Congress Ave. - WPB to Boca Raton	52.80%	Minority
3	Route 3 Via Military Trail - PBG to Boca Raton	53.4%%	Minority
4	Route 4 Via Haverhill Rd. - WPB to VA Medical Center	73.90%	Minority
10	Route 10 North County Crosstown	23.60%	Non-Minority
20	Route 20 Via Northlake/Congress - Gardens Mall to WPB	61.70%	Minority
21	Route 21 Via US-1/Barack Obama Hwy. - Gardens Mall to Mangonia Park Tri-Rail	64.20%	Minority
30	Route 30 Via Blue Heron Blvd. - Riviera Beach Crosstown	75%	Minority
31	Route 31 Via 45th St. and Tamarind Ave. - WPB Crosstown	81.80%	Minority
33	Route 33 Via Gardens Dr., Australian Ave. & Palm Beach Lakes Blvd. - Gardens Mall to Cross County Plaza	70.80%	Minority
40	Route 40 Via SR 80 - Wellington to Belle Glade (limited stop service)	47.50%	Minority
41	Route 41 West Palm Beach to Palm Beach Inlet	25.80%	Non-Minority
43	Route 43 Via Okeechobee Blvd. - West Palm Beach to Wellington	67.80%	Minority
44	Route 44 Via Belvedere Rd. - WPB Crosstown	71.40%	Minority
46	Route 46 Via Forest Hill Blvd - WPB to Wellington	73.20%	Minority
47	Route 47 Via SR-15 - South Bay to Canal Point	92.60%	Minority
49	Route 49 Via Palm Beach Lakes Blvd. - West Palm Beach - Palm Beach Outlet Mall	71.70%	Minority
52	Route 52 Via Okeechobee Blvd./SR-7 Royal Palm Beach Crosstown	50.70%	Minority
60	Route 60 Via Parker Ave., Summit Blvd., Kirk Rd. and Purdy Ln. - WPB to River Bridge Centre	72.90%	Minority
61	Route 61 Via Cresthaven Blvd. and 10th Ave. N - Greenacres to Lake Worth	67.60%	Minority
62	Route 62 Via Lake Worth Rd. - Wellington to Lake Worth	62.70%	Minority
63	Route 63 Via Lantana Rd. and Jog Rd. - Lantana to River Bridge Centre	59.60%	Minority
64	Route 64 Via Melaleuca Ln./6th Ave. S - Greenacres WIC to Lantana Public Health	70%	Minority
70	Route 70 Via Seacrest Blvd. - Lantana Rd. to Delray Beach Tri-Rail	66.20%	Minority
71	Route 71 Via Lawrence Rd. - Boynton Beach Crosstown	54.90%	Minority
73	Route 73 Via Boynton Beach Blvd. - Boynton Beach Tri-Rail to Bethesda Hospital West	49.70%	Minority
80	Route 80 Via Lake Ida Rd. & SW 4th Ave. - Delray Square to Plaza Delray	66.40%	Minority
81	Route 81 Via Atlantic Ave. - Delray Beach Crosstown	31.80%	Minority
88	Route 88 Via Jog Rd. and Linton Blvd. - Delray Beach Crosstown	32.80%	Minority
91	Route 91 Via Glades Rd. - Sandalfoot Square to Florida Atlantic University	32.60%	Minority
92	Route 92 Via Palmetto Park Rd. - Boca Raton Crosstown	27.80%	Minority
94	Route 94 Via FAU/20th St. - Boca Raton Tri-Rail to Camino Real	31.60%	Minority

On-Time Performance: On time performance refers to the number of runs completed on time. Routes are monitored using the Automatic Vehicle Locator (AVL) data to identify routes that need improvement.

On-time is defined as arriving at a route time-point from 59 seconds early up to five minutes late. The goal for on-time performance is 78 percent.

With the public outreach effort conducted during the Route Performance Maximization (RPM), this standard was modified in September 2018.

Palm Tran monitors on-time performance using Automatic Vehicle Locator (AVL) data transmitted from transit vehicles. Palm Tran's threshold for disparate impact is 10% above or below the system-wide average performance.

System-wide average on-time performance is 81.1%, which is above the 78% goal. Minority routes also exceed this goal, performing equal to the system-wide average at 81.1% on-time. At 3.1% above the system-wide average performance, on-time performance for Minority routes is well below the threshold for disparate impact. Non-Minority routes on-time performance is 1.7% above that for Minority routes, at 82.8% on-time average performance.

Table 2: Average On-Time Performance

	AVERAGE ON-TIME PERFORMANCE	AVERAGE ON-TIME PERFORMANCE NOT MEETING 78% STANDARD
	AT 78% OR ABOVE	
System-wide	81.1%	18.9%
Minority	81.1%	18.9%
Non-Minority	82.8%	17.7%

Seven routes, of all Palm Tran routes, have on-time performance below the 78% goal. All Seven of these routes are Minority routes.

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for on-time performance.**

Headway: The amount of time between two vehicles traveling in the same direction on a given route.

Comparisons of performance between routes must take into considerations the characteristics of the routes as summarized below:

- a) **Trunk Routes:** Collect and distribute high-turnover ridership along developed corridors radiating to and from the area commonly referred to as the urban core. This service is characterized by frequent stops, and relatively slow average bus speed.
- b) **Cross-town Routes:** Are mainly used to link trunk routes serving the urban core, though many cross-town also serve high density corridors with internal travel markets.
- c) **Circulator Routes:** Are routes that circulate and provide services within a city or community.

Frequency of fixed route service. Peak period weekday schedules should have a minimum of 30-minute headways on trunk routes and 60-minute headways on cross-town and circulator routes. Off-peak weekday and weekend schedules should have a minimum of 60-minute headways.

Palm Tran implemented Major Service Changes on September 30, 2018, entitled the Route Performance Maximization (RPM).

Table 3: Routes by Category

Routes Category	Routes	Weekday Peak	Weekday Base	Weekend Base
Trunk Routes	1, 2, 3	30	30	60
Cross-Town Routes	4, 10, 20, 21, 30, 31, 33 40, 43, 44, 46, 47, 60, 61 62, 63, 70, 73, 81, 91, 92	50	50	60
Circulators	41, 49, 52, 71, 80, 88, 94	50	50	60

Average Headways

Trunk Routes: All 3 Trunk Routes are minority routes, and are performing at 80.1% on-time performance and above. The average scheduled headway for Palm Tran Trunk Routes is 27 minutes for peak time during the week.

System-Wide: The average scheduled headway for Palm Tran routes is 48 minutes on weekdays, 57 minutes on Saturdays, and 60 minutes on Sundays. The average headways for Minority routes are nearly identical to the system-wide averages, indicating no disparate impact in scheduled service frequency. Headways on Non-Minority routes average 68 minutes on weekdays, which is 20 minutes higher than the system-wide average. Service operates every 68 minutes on Saturdays, slightly higher than the system wide average; Non-Minority routes have no Sunday service.

Table 4: Average Headways

	WEEKDAY	SATURDAY	SUNDAY
System-wide	48	57	60
Minority	47	56	60
Non-Minority	68	68	0

Fifteen of Palm Tran routes operate every 60 minutes on weekdays, including one Non-Minority route and 14 Minority routes. 9 Palm Tran routes operate with frequencies of 30 minutes or less on weekdays, and all of these are Minority routes. One Non-Minority route (Route 10) operates every 60 minutes, while another (Route 41) operates only seven trips per day during peak hours. One Minority route (Route 71) operates every 75 minutes on weekdays.

Saturday service is more uniform, with most routes operating every 60 minutes and some operating at 45 minutes. The exceptions include one Minority route (Route 1) that operates every 30 minutes and one Non-Minority route that operates only five trips during the morning and afternoon hours (Route 41). On Sundays, routes operate every 60 minutes except for Route 1 (every 30 minutes), Route 62 (every 40 minutes) and Route 70 (every 75 minutes), and Route 88 (every 90 minutes); all of these are Minority routes.

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for service frequency.**

Vehicle Loadings: Vehicle load is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of possible overcrowding or the need for supplementary vehicles. It is also a means to determine whether the level of service on a route at a particular time is adequate to guarantee a level of service demand appropriate for the transit system. Each bus is evaluated in terms of passenger flow, which is the number of passengers on buses at the busiest location along a route. This is known as the maximum load point.

Load factor is generally defined as how crowded a public transit vehicle must be before additional service is added. It is usually written as a decimal point to two places which represents the percentage of the seats that are filled. For example, a 1.00 load factor means that every seat on the bus is full, 1.25 means that every seat on the bus is full and the number of standees equals 25% of the number of seats on the bus, and so on. In terms of evaluating required service levels transit systems usually determine the average load factor at the peak load point.

The maximum passenger loads per bus should not exceed 150% of the seating capacity.

In other words, in a low floor 40-foot bus that has 38 seats the bus will be described as crowded if more than 57 people are on board (38 seats + 19 (50% of 38) = 57).

Palm Tran will monitor peak loads on lines that are at or above ratios. When loads at the peak lead point exceed vehicle load standards, service should be evaluated for adjustment. System-wide evaluations will be conducted annually.

Table 5: Vehicle Load for Palm Tran Buses

Vehicle Type	Seating Capacity	Standing Load	Maximum Load	Vehicle Load Ratio
29' Gillig	23	12	35	1.5
35' Gillig	30	15	45	1.5
40' Gillig	37	19	56	1.5
60' New Flyer	58	29	87	1.5

This standard has not been modified since September 2013.

When loads at the peak load point exceed this threshold, service should be evaluated for possible adjustment, including increased service frequency or assignment of larger vehicles during peak times.

The average vehicle load system-wide is 0.37, while the average maximum vehicle load system-wide (an average of the highest load of each route) is 0.69. Minority routes have a slightly higher average load (0.38), while Non-Minority routes are slightly lower (0.22). Minority routes have an average maximum load of 0.71 and Non-Minority routes have an average maximum load of 0.42.

Table 6: Vehicle Load

	AVERAGE LOAD	MAXIMUM LOAD
System-wide	0.37	0.69
Minority	0.38	0.71
Non-Minority	0.22	0.42

While most routes have average loads and maximum loads below 1.0, there are seven routes that are below the 1.5 threshold but have a maximum load over 1.0. Seven of these routes are Minority routes (Route 1, Route 2, Route 3, Route 61, Route 62, Route 73, and Route 94), accounting for 23% of all Minority routes.

One notable finding is that Route 1's maximum load is based on a vehicle capacity of 58 passenger seats, which is the largest vehicle operated on Route 1; a maximum load of 1.07 given an already high-capacity vehicle speaks to the potential issue of crowding that Route 1 passengers may face.

Route 3 has the highest maximum load among all Palm Tran routes, and is also the route with the highest average load (1.08). Route 3 currently operates a maximum vehicle capacity of 37 passenger seats.

Table 7: Maximum Vehicle Load over 1.0

	AVERAGE LOAD	MAXIMUM LOAD
Minority		
Route 1	0.64	1.07
Route 2	0.65	1.03
Route 3	1.08	1.35
Route 61	0.57	1.03
Route 62	0.57	1.03
Route 73	0.24	1.27
Route 94	0.41	1.31

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for vehicle load.**

Service Availability: Service availability is a general measure of the distribution of routes within a transit provider's service area.

In Palm Beach County, the goal for service availability is defined as having public transit available within a ¾ mile walk to 80% of all County residents.

The standards covering this area relate to existing services as well as proposed changes in levels of service.

Service availability and coverage are based on density of development. Currently, the maximum distance 84% of the county population must walk to obtain access to Fixed Route is ¾ of mile. This distance has been determined by the Americans with Disabilities Act (ADA). The ADA regulations require transit providers to offer complementary paratransit service to eligible individuals in an area defined by corridors 3/4 of a mile to each side of fixed routes.

When asking about maximum distances that can be traveled, the paratransit eligibility manual explains: A measure that will be most easily understood by applicants in the area is the number of blocks that can be traveled. In general, nine city blocks are approximately 3/4 of a mile in length. Those located within 3/4 of a mile from Fixed Route service, who have a disability which prevents them from accessing the service may contact Palm Tran CONNECTION and request Paratransit service.

The foremost objective of the service standards is to provide a structure for a consistent and fair assessment of both existing and projected services. Because markets, customer expectations and Palm Tran's resources vary over time, service standards are evolutionary by nature.

Palm Tran's current services must be managed carefully and modified frequently to match service labels to demand and respond to opportunities for new or enhanced services.

This standard has not been modified since September 2013.

Palm Tran's goal for service availability is defined as having public transit available within a 3/4-mile walk to 80% of all Palm Beach County residents. Currently, 79.8% of Palm Beach County's population resides within three quarters of a mile of transit service, which is approximately equal to Palm Tran's service availability goal. In contrast, 90.6% of the County's minority population is within a 3/4-mile walk of service, indicating that Palm Tran exceeds its goal for service availability to minority residents.

Table 8: Service Availability

	All County Residents	Minority Residents Only
Share of population within 3/4-mile of service	79.8%	90.6%

All Palm Tran routes operate on weekdays, with an average of 13.7 hours of service per route. Minority routes operate an average of 13.9 hours of service, slightly higher than the system average, while Non-Minority routes operate 11.4 hours of service per weekday.

On Saturday, all routes operate an average of 11.49 hours of service, with Minority routes operating slightly more (11.6 hours) and Non-Minority routes operating slightly less (11.4). After the implementation of Palm Tran's Route Performance Maximization (RPM), all routes now have Saturday services.

Table 9: Average Daily Hours of Service

	WEEKDAY	SATURDAY	SUNDAY
System-wide	13.7	11.5	5.1
Minority	13.9	11.6	5.5
Non-Minority	11.4	10.5	0

Significantly less service is provided system-wide on Sundays. On average, Palm Tran routes provide only 5.1 hours of service on Sundays, with 5.5 hours on Minority routes and no Sunday service on Non-Minority routes. Only 22 of Palm Tran's 32 routes operate on Sundays: 22 of these are Minority routes (accounting for 73% of all Minority routes). Palm Tran's two non-minority routes do not operate on Sundays.

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for service availability.**

Vehicle Assignment: Palm Beach County's policy directs Palm Tran to ensure that the average vehicle age for minority routes are similar to that for Palm Tran's system-wide average vehicle age. The threshold to determine adverse disparate impact is established at 150% of the overall system average vehicle age.

This policy has not been modified since September 2013.

The average age of all Palm Tran vehicles is currently 6.8 years, which indicates a threshold for disparate impact at 10.2 years. The current average age for Minority route vehicles is 6.9 years, which is approximately the same as the system average and 3.3 years below the threshold. Non-Minority route vehicles are an average of 5.0 years, above the average age of all Palm Tran vehicles. Most Palm Tran routes are Minority routes.

Table 10: Age of Assigned Vehicles

	Average Vehicle Age
Palm Tran Fleet	6.8
Minority	6.9
Non-Minority	5.0

Currently, no Palm Tran routes exceed the 10.2 year threshold for disparate impact.

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for vehicle assignment.**

Distribution of Transit Amenities: Palm Beach County's policy directs Palm Tran to provide bus stop amenities based on ridership, location and connectivity to other bus routes where there is sufficient right-of-way and/or dedicated transit easement.

This policy has not been modified since September 2013.

Palm Beach County contracts with companies that provide shelters and benches for Palm Tran stops at locations that allow for advertising, and Palm Tran and the vendors must agree on the proposed locations for the amenities. Municipalities that do not allow advertising, provide non-advertising shelters and benches within their communities.

There is no established threshold for the distribution of transit amenities along Minority routes compared to the overall system.

There are 2,986 bus stops in the Palm Tran system, and 1,093 stops (37%) have at least one type of amenity (a bench and/or shelter); 95.7% of these stops are located in Minority Routes. System-wide, stops on Minority routes, 37.5% of stops have an amenity, compared to 31.8% of Non-Minority stops. Minority Routes account for 93.8% of the system.

Table 11: Distribution of Transit Amenities

	STOPS WITH ANY AMENITY	STOPS WITH BENCHES	STOPS WITH SHELTERS
Systemwide	36.7%	17.6%	19.0%
Minority	37.5%	18.2%	19.3%
Non-Minority	31.8%	17.1%	14.7%

- **Based on these findings, Palm Tran is in compliance with the agency's Title VI goals for distribution of transit amenities.**

SERVICE CHANGE PROCESS

Palm Tran has a well thought-out method for evaluating services and anticipated changes that is tied to the annual budget, yet is responsive to small market changes all year long.

As part of the continuing evaluation of the performance of all routes and services all service change proposals, including major service changes, are to be brought to the PTSB for approval and to the BCC as required.

The process comprises of the following attributes:

- Development of an Annual Service Budget Proposal
- A transparent procedure for evaluating service changes
- Accountability and flexibility in all service change decisions
- An annual comparative assessment for major alterations

In support of the annual budget process, Planning & Scheduling creates an Annual Service Budget Proposal that recognizes budget needs for each service change type for the following year's finances. This is derived from an evaluation of the performance of all routes and the service change proposals received.

Once approved, the Annual Service Change Budget guides the service changes that will be assessed and executed over the budget year. The Service Change Budget includes allotments for various classifications of service changes such as enhancements, reductions and all service alterations.

Service Change Process Overview

Requests for service alterations and new services can be proposed by anyone such as private citizens, elected officials, Palm Tran employees, employers, etc. It can also be an effect of ongoing monitoring and data compilation.

Palm Tran's service change process review consists of utilizing service planning scenarios with Remix software, staff review of proposed changes, financial/fleet projections, review with Palm Tran Operations Department, Listening sessions with Palm Tran operators, Palm Tran Executive Leadership Team review, public hearings, implementation and oversight, and working with the Performance Management Office (PMO) to look at route productivity.

SERVICE MONITORING AND REPORTING

Service monitoring and data compilation are essential elements of the service evaluation process. All services and routes are regularly reviewed to evaluate their performance and efficiency.

2019 Title VI Update General Review Conclusions

- Most of Palm Tran's fixed routes are considered Minority routes (30 out of 32 routes, or 94%).
- Approximately 30% of Palm Beach County's population is considered minority.

ON-TIME PERFORMANCE

- 20 of the 30 Minority routes perform above the agency's threshold for on-time performance (78% on time).
- 22% of the Routes (7) are below the 78% goal.

SERVICE FREQUENCY (Headway)

- Scheduled service frequency on Minority routes is equal to or slightly better than system-wide averages on all days; Non-Minority routes average longer headways on weekdays, and on Saturdays and have no services on Sundays compared to the system-wide averages.

VEHICLE LOAD

- Vehicle loads on minority routes are well below the established threshold for vehicle loading and are close to the system-wide average for vehicle age.
- Although no Palm Tran route exceeds the established threshold for vehicle loads, seven Minority routes (14% of all Minority routes) exhibit maximum load ratios of greater than 1.0: Route 1, Route 2, Route 3, Route 61, Route 62, Route 73, and Route 94.

SERVICE AVAILABILITY

- Approximately 80% of Palm Beach County's population resides within $\frac{3}{4}$ of a mile of transit service, achieving the agency's service availability goal. In comparison, about 91% of the County's minority population is within $\frac{3}{4}$ of a mile of service, well above the agency's goal for service availability.
- All Palm Tran routes operate on weekdays and Saturdays. 22 Minority routes operate on Sundays, compared to no Sunday services on Non-Minority routes. Service hours provided on Minority routes equal or exceed the system-wide average service hours.

VEHICLE ASSIGNMENT

- Vehicles assigned to Minority routes average 6.9 years old, which is 3.3 years below Palm Tran's threshold of 10.2 years and approximately the same as the system average.

- No Palm Tran routes exceed the established threshold for disparate impact at 10.2 years.

DISTRIBUTION OF TRANSIT AMENITIES

- The share of bus stops on Minority routes with amenities (37.5%) is above the share of all Palm Tran bus stops with amenities (36.6%).
- 95.8% (1,093) of these stops are in minority routes.

RECOMMENDATIONS

Based on the findings of this assessment, Palm Tran is currently in compliance with the agency's Title VI goals for all performance metrics. As a result, no equity-related adjustments are required at this time.

DEMOGRAPHIC AND SERVICE PROFILE MAPS

Palm Tran has collected relevant demographic data for its service area to assess compliance with Title VI requirements that the benefits of federally supported programs be equitably distributed.

The population of Palm Beach County is heavily concentrated within 10 miles of the coast on the eastern side of the county. The central portion of Palm Beach County is primarily designated for agriculture and wilderness preserve. There are some small communities located near the western boundary of the county in the area of Lake Okeechobee. The distribution of population in Palm Beach County creates a very challenging environment for Palm Tran by requiring very long routes that often run through sparsely populated areas to connect different centers.

The 2017 American Community Survey (ACS) data identified 1,471,150 residents in Palm Beach County. The minority population includes African Americans, Asians, American Indians, Pacific Islanders, people of Hispanic or Latino origin, other non-white races, and persons of two or more races. In Palm Beach County, 26.5% of the residents were members of minority groups in 2017. Following the census data identification of ethnicity for Hispanic residents in Palm Beach County, Palm Tran also identified the Hispanics as a separate group. In Palm Beach County, 22.3% of the residents identified themselves as of Hispanic origin, regardless of race.

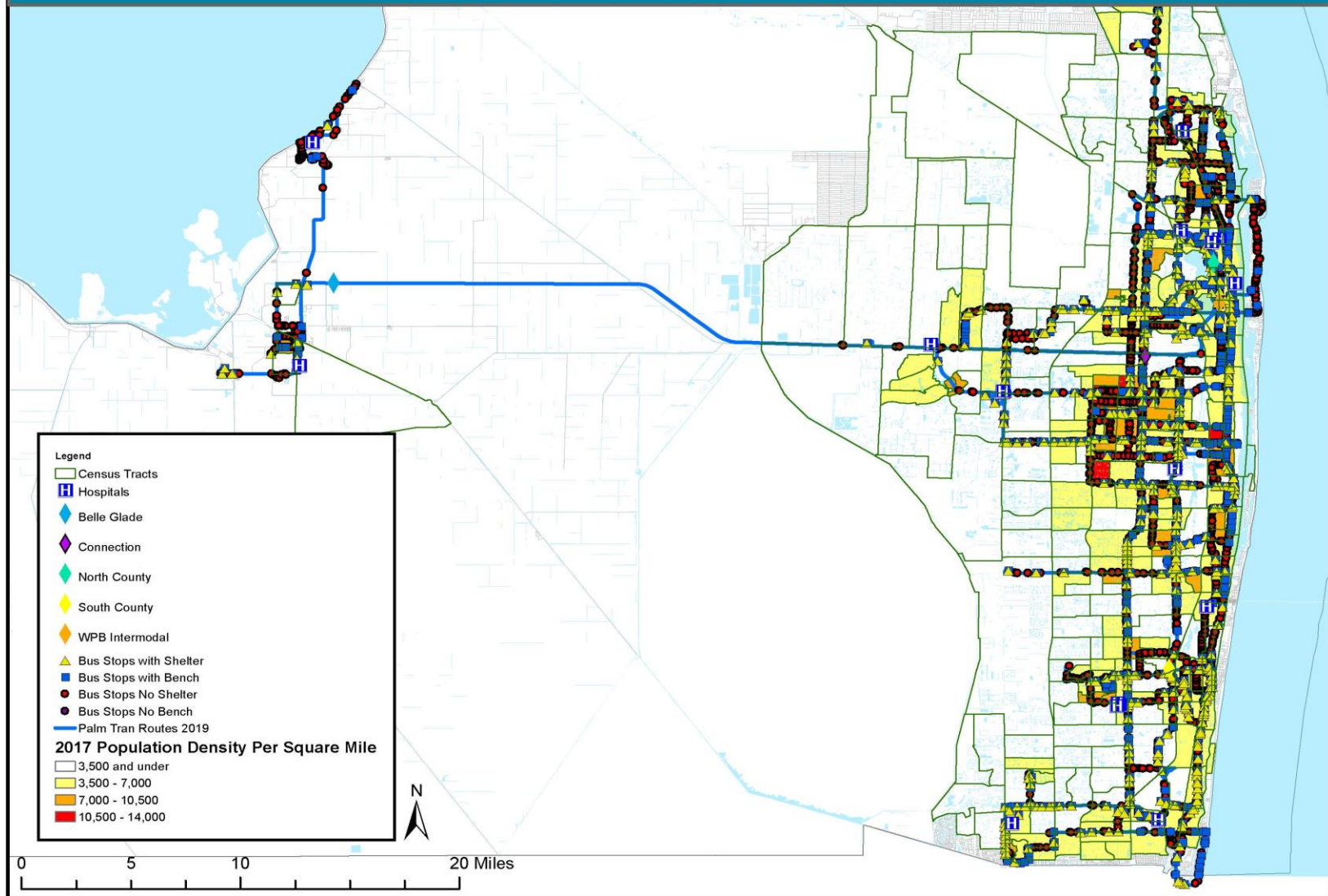
Figure 3 is a base map of Palm Beach County which is Palm Tran's service area. The map overlays census tracts, population density by census tracts, transit facilities—including transit routes, transit stops and stations, depots, maintenance and garage facilities, and administrative buildings, as well as Palm Beach county streets.

Figure 4 is a demographic map that plots the information listed in Figure 3 above (minus population density) and also shades those Census tracts, where the percentage of the total minority population residing in Palm Beach County exceeds the average (26.5%) percentage of minority populations for the service area as a whole.

Figure 5 is a demographic map that plots the information listed in Figure 3 above but only shades those Census tracts, where the percentage of the Hispanic population residing in Palm Beach County exceeds the average (22.3%) percentage of Hispanic population for the service area as a whole.

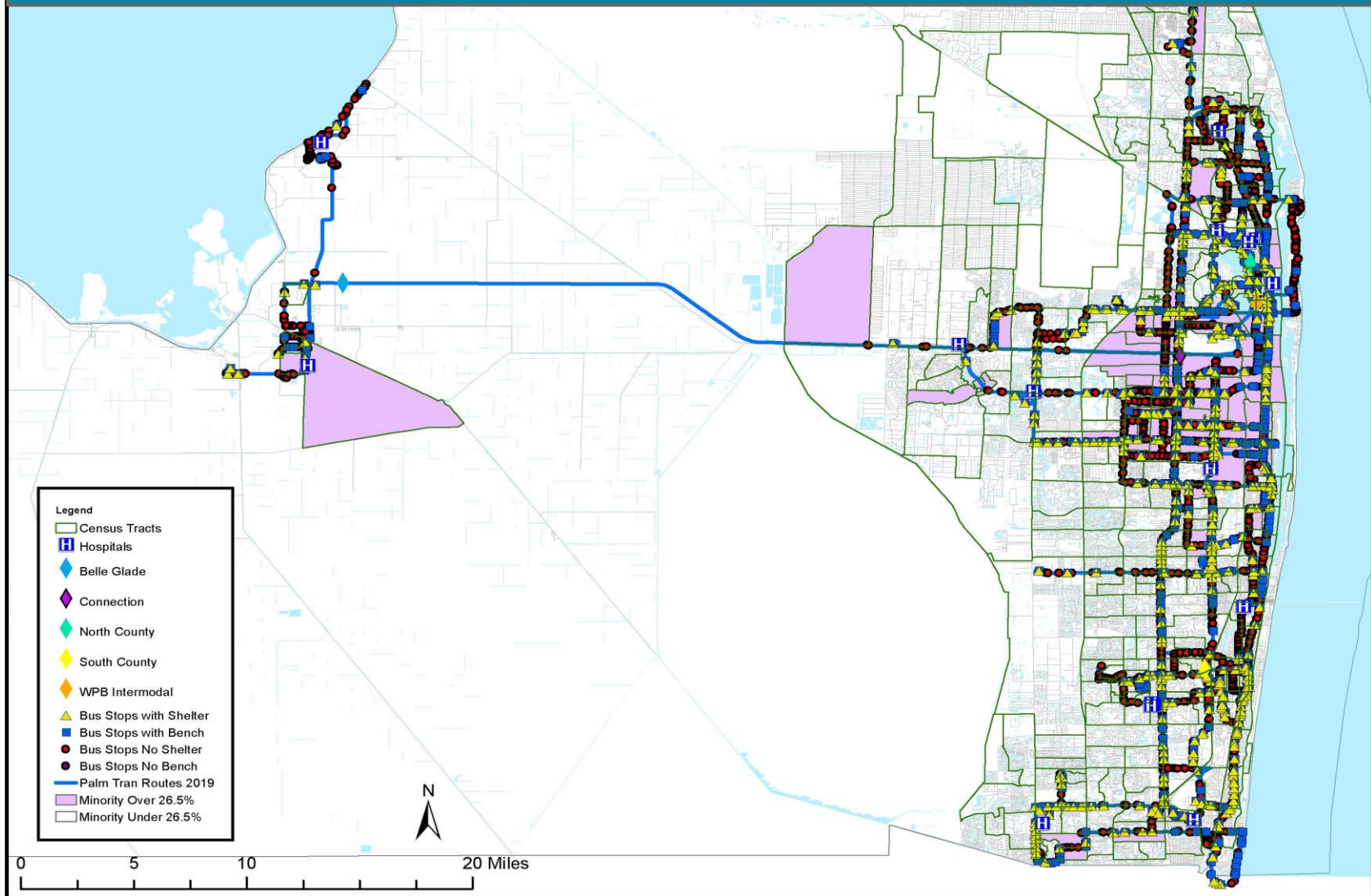
Figure 6 is a demographic map that plots the information listed in Figure 3 above (minus population density) and also shades those Census tracts, where the percentage of the total low-income population residing in Palm Beach County exceeds the average (11.8%) percentage of low-income populations for the service area as a whole.

Figure 3: Population Density (2017 American Community Survey Data)



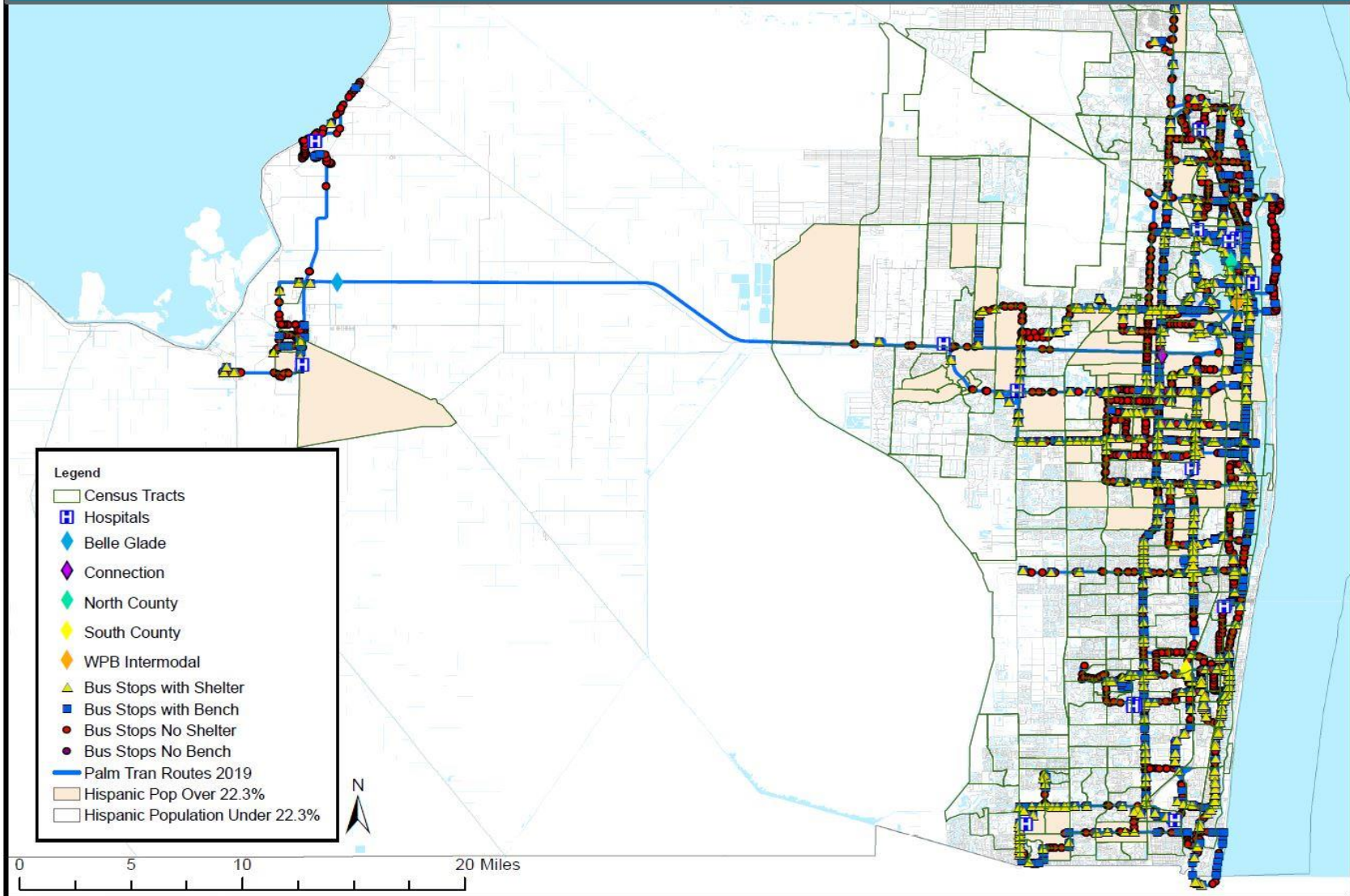
Source: Palm Tran and 2017 ACS Data

Figure 4: Minority Population (2017 American Community Survey Data)



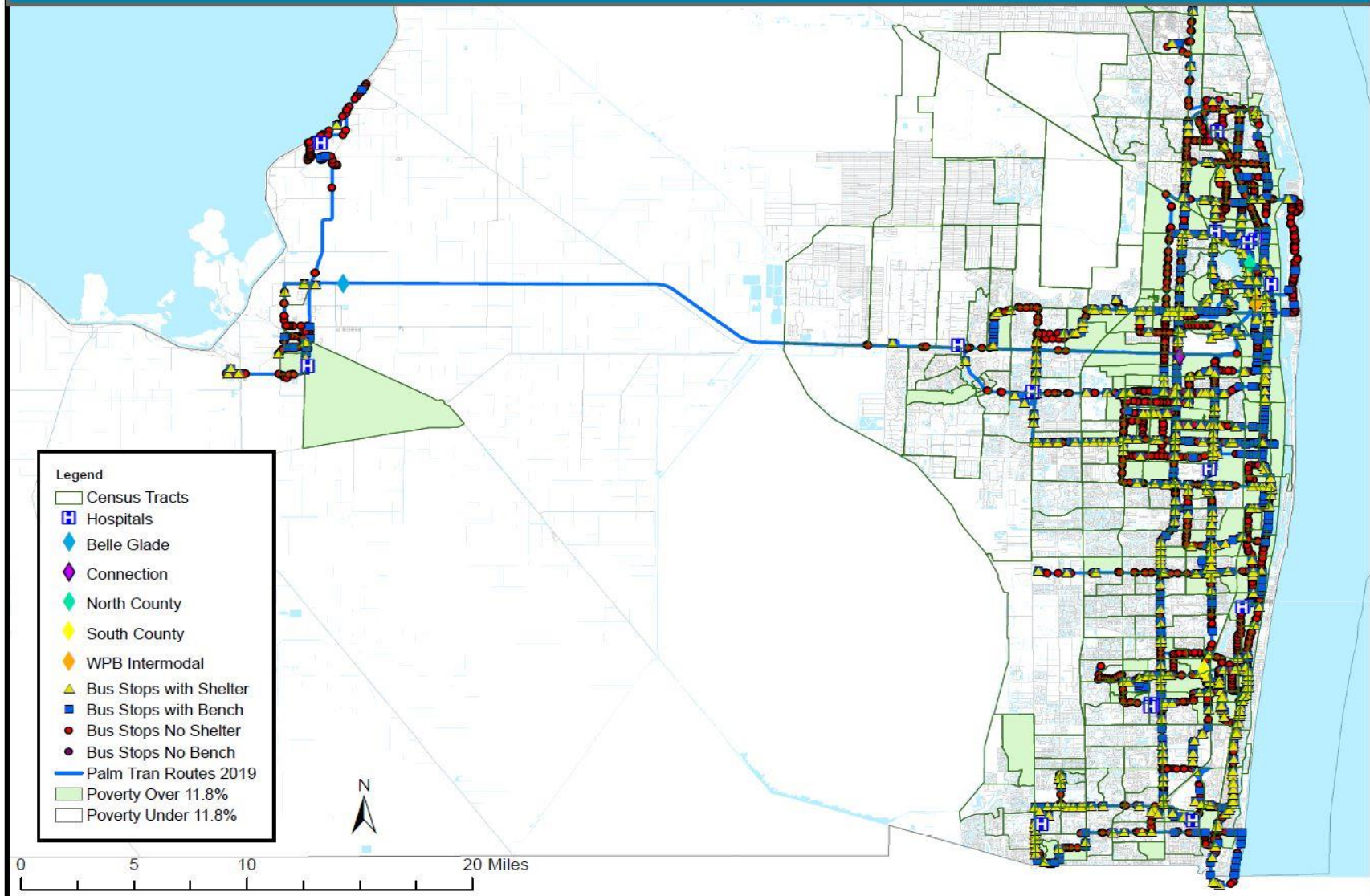
Source: Palm Tran and 2017 ACS Data

Figure 5: Hispanic Population (2017 American Community Survey Data)



Source: Palm Tran and 2017 ACS Data

Figure 6: Low-Income Population (2017 American Community Survey Data)



Source: Palm Tran and 2017 ACS Data

Demographic Ridership and Travel Patterns

The table below compares Palm Beach County population growth to that of other local counties and Florida as a whole. Palm Beach County has a comparable per capita investment in transit operations to Broward County but falls behind other jurisdictions with larger populations.

Table 14: Palm Beach County and South Florida Population

Area	2010	2017	% Change
Palm Beach County	1,320,134	1,471,150	11.4%
Broward County	1,748,066	1,935,878	10.7%
Miami Dade County	2,496,435	2,751,796	9.27%
Florida	18,801,310	20,984,400	11.6%

Palm Beach County is home to people of many backgrounds and ethnicities. Per the 2017 American Community Survey (ACS), nearly 73.5% of Palm Beach County residents are white, 19.2% are African-American, 2.7% are Asian, 0.2% are American Indian or Native Hawaiian, and 2.3% are identified as another race. Of all county residents, 22.3% identified themselves as Hispanic.

The African-American population is concentrated in particular areas of the county like West Palm Beach north of Okeechobee Boulevard and east of I-95, Delray Beach and Boynton Beach east of I-95, and the Glades region.

The population that identifies as Hispanic is more spread out but has the heaviest concentration in the unincorporated areas south of Southern Boulevard, Greenacres, Palm Springs, and Atlantis.

The 2017-2026 Transit Development Plan (TDP) developed by the consultant Tindale Oliver and Associates reports data from the 2010-2014 American Community Survey (ACS).

Public transportation usage is slightly lower in Palm Beach County (1.9%) than the state average (2.1%). The 2010-2014 American Community Survey (ACS) indicated that 42% of Palm Beach County workers who use transit for commute purposes are adults between the ages of 25 to 44. At 17.3% of commuters using transit, the second largest group are older adults from 45 to 54 years of age. ACS data indicates that over 69% of Palm Beach County commuters who use transit as a means of getting to work are considered low-income as they make less than \$25,000 annually.

RESULTS OF SERVICE AND/OR FARE EQUITY ANALYSES CONDUCTED SINCE THE LAST TITLE VI PROGRAM SUBMISSION

Palm Tran implemented a Major Service Change on September 30, 2018. This project was entitled the Route Performance Maximization (RPM). Similar to other transit agency initiatives around the country, the RPM entailed an over-haul of the fixed-route network to maximize service efficiencies to current and future customers. A critical component of the network changes involved straightening out routes to provide more direct service and improve travel times. Some other improvements included Saturday service on all routes and an increase of 8% on routes that have Sunday services. The RPM service equity analysis results are as follows:

Findings: The results of the Title VI equity analysis performed to compare the proposed RPM bus network changes with the existing bus network *found no disproportionate adverse impacts* on low income or minority populations. The impacts of the proposed RPM bus network changes improve access to transit services for low income and minority populations in greater proportion than for the general public within the bus network service area.

Requirements: Transit providers within service areas containing more than 200,000 residents are required under Title VI of the Civil Rights Act of 1964 to complete an equity analysis of any major service change or fare change. The analysis must be completed during the programming stages, regardless of the proposed amount of fare increase or in the case of service changes, a service equity analysis is required for any major service change. Requirements for major service changes differ based on the magnitude of changes and established thresholds. The purpose of an equity analysis is to ensure that any potential fare structures or service changes are consistent with Title VI of the Civil Rights Act of 1964 and are fair and equitable to all citizens, regardless of race, color, or national origin. The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," are:

- To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making process are provided to persons without regard to race, color, or national origin.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken by all applicants and recipients of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

An equity analysis must be completed to determine whether planned changes will have a disproportionate impact on minority populations. Although low-income populations are not a

protected class under Title VI, it is recognized through statistical analysis that there is an inherent overlap of environmental justice (EJ) principles with low income populations. Additionally, because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine if low-income populations will bear a disproportionate burden of the changes. Therefore, an equity analysis determines whether there is a disproportionate burden between the existing fare or service and the proposed fare or service change on low-income riders.

Methodology: The service equity analysis compares access to bus transit services for the proposed bus network changes in relation to the existing bus network. Access to transit services was determined based on changes in routes and related bus stops. The methodology used is as noted:

1. Identify existing Title VI areas within Palm Beach County comprised of Census block groups with: a) minority populations greater than the average countywide minority population, and b) low income populations greater than the average countywide low income population. Within the Palm Tran service area, low income population accounts for 13.9% of the general population and minority population accounts for 43.1% of the general population.
2. Determine if the service changes constitute a major service change. The proposed bus network changes will affect more than 25% of the existing route network and therefore are considered a major service change.
3. Using service planning GIS analyses, calculate impacts of proposed service changes on ridership access within designated Title VI population areas, including:
 - a. Changes to and/or elimination of bus stops using walksheds of ¼-mile
 - b. Changes to service span impacting ridership within the time periods impacted
 - c. Changes to service frequency impacting ridership
 - d. Changes to routes alignments and eliminations impacting accessibility
4. Using service planning GIS analyses, calculate impacts of proposed service changes on ridership activity within the overall Palm Tran bus network, including:
 - a. Changes to and/or elimination of bus stops using walksheds of ¼-mile
 - b. Changes to service span impacting ridership within the time periods impacted
 - c. Changes to service frequency impacting ridership
 - d. Changes to routes alignments and eliminations impacting accessibility
5. Compare impacts on Title VI protected groups to impacts on the general system
 - a. If impacts to Title VI protected groups are greater than 20% of impacts on the general public, per Palm Tran policy, then an adverse disproportionate impact exists
 - b. If disproportionate impacts do not exist, then changes are in compliance with Title VI

6. For disproportionate impacts, identify reasonable means to mitigate the adverse impacts on low income and minority areas.
7. Results: The results of the Title VI analysis found *no disproportionate adverse impacts on low income or minority populations* within the Palm Tran service area using a ¼-mile buffer as a standard walkshed measure of access to service. The results reflect that the proposed bus network changes adversely affect access to Palm Tran fixed route services for non-low income and non-minority areas at a rate greater than the average for low income and minority areas.

The analysis examined net bus stop changes to service access between the existing and the proposed bus networks by focusing on areas in which service access will be eliminated (no access to service within ¼-mile of a bus stop). The proposed bus network changes would result in a net elimination of 89 bus stops where walkshed access is greater than ¼-mile. The existing bus network includes 3221 bus stops. The proposed bus network will include 3132 bus stops.

The impact of elimination of bus stops for low income and non-low income areas as well as for minority and non-minority areas is reflected in the tables below. For low income areas, 1.2% of existing stops are eliminated compared to 4.0% for non-low income areas. For minority areas, 1.2% of existing stops are eliminated compared to 3.4% for non-minority areas.

Low Income	Non-Low Income	Total	
1441	1780	3221	Existing stop total
1424	1708	3132	New stop total
17	72	89	Removed stops (beyond 1/4-mile)
1.2%	4.0%	2.8%	% removed (total existing network)
19.1%	80.9%	100.0%	% removed (removed stops)

Minority	Non-Minority	Total	
894	2327	3221	Existing stop total
883	2249	3132	New stop total
11	78	89	Removed stops (beyond 1/4-mile)
1.2%	3.4%	2.8%	% removed (total existing network)
12.4%	87.6%	100.0%	% removed (removed stops)

The direct impact on Title VI protected populations is lower than that for the general population within the service area. Further, the difference in impacts on Title VI populations compared to the general public is less than the 20% Palm Tran policy threshold. Therefore, no disproportionate adverse impacts accrue to Title VI protected populations and no additional mitigation is necessary.

PALMTRAN SOUTH COUNTY ADMINISTRATIVE FACILITY EXPANSION

By 2020, Palm Tran will expand and renovate its existing Palm Tran South County Facility. The City of Delray Commission meeting on January 16, 2018 opened up Agenda Item 7.B (CONDITIONAL USE REQUEST FOR EXPANSION OF THE PALM TRAN SOUTH COUNTY FACILITY) for a public comment meeting, complying with the 4703.1 FTA Environmental Justice Circular regarding community outreach for facilities expansion. Only one public comment was received regarding the facility expansion.

See **Appendix C** for meeting agenda and minutes.

Appendix A

Palm Tran Route Performance Maximization (RPM) Public Outreach Efforts and Public Hearings

In order to better serve Palm Beach County, Palm Tran undertook the Route Performance Maximization (RPM) initiative that resulted in a more direct, efficient and usable system in Palm Beach County. The new network proposal, using existing resources, provides Palm Beach County residents with more convenient and faster service to key employment, educational and economic centers throughout the county. The Palm Tran team worked diligently for more than two years to develop a new fixed route bus network based on feedback that was received through customer concerns over the years and outreach/input efforts that took place starting with April 2018. Palm Tran kicked off Phase 1 of RPM in May 2017 and completed it in November 2017. Phase 2 of RPM consisted of bus network modifications, schedule and bus stop location adjustments, and public outreach. Phase 2 public outreach incorporated the feedback as part of the new route network, including a public hearing at the Palm Tran Service Board (PTSB) on June 28, 2018 where the proposed changes were unanimously approved by the Board. Additional outreach and customer education of the bus route changes occurred from August 2018 through November 2018. A final public hearing for the RPM effort took place at the August 14, 2018 Board of County Commissioners meeting. All outreach efforts and public hearing notices are listed below:

Phase 1 Outreach Summary:

Date (2018)	Location	Region	Routes	Impact Routes	Time of Day
Sep 24th	Intermodal	C	45, others	Y	3pm- 5pm
Sep 24th	DT Lake Worth	C	1, 61, 62	N	4pm - 6pm
Sep 24th	Wellington	W	40,43,46,52, 62	Y	4pm- 6pm
Sep 25th	Boca Tri-Rail	S	2, 94	Y	10a - 12p
Sep 25th	Outlets	N	2, 33, 49	Y	7a-9a
Sep 25th	Gardens Mall	N		Y	7a-9a
Sep 26th	Intermodal	C	45, others	Y	6a-9a
Sep 26th	VA Medical	N	2, 3, 4, 30, 31	Y	4pm-6pm
Sep 26th	WestTech	W	40, 47, 48	Y	530a-700a
Sep 27th	Camino	S	1, 91, 92	Y	6a-8a
Sep 27th	Lant/Cong	S	2, 63	Y	6a-8a
Sep 27th	Wellington	W	40,43,46,52, 62	Y	7a-9a
Sep 28th	Boca Mall	S	2, 3, 91,92	Y	
Sep 28th	Mangonia	N	20, 31, 33	Y	
Sep 28th	CrossCty	C	3, 33, 43, 49	Y	
Sep 29th	Intermodal	C	45, others		
Sep 29th	VA Medical	N	2, 3, 4, 30, 31	Y	
Sep 29th	BocaMall		1,91,92	Y	
Sept 30th	Intermodal				
Sept 30th	Wellington	W	40,43,46,52, 62	Y	
Sept 30th	Outlets	N	2, 33, 49	Y	
Oct 1st	Intermodal	C	45, others	Y	6am- 10am
Oct 1st	Intermodal	C	45, others	Y	10am- 2pm
Oct 1st	Intermodal	C	45, others	Y	2pm - 6pm
Oct 1st	Outlets	N	2, 33, 49	Y	7am - 10am
Oct 1st	VA Center	N	2, 3, 4, 30, 31	N	6am- 10am
Oct 1st	VA Center	N	2, 3, 4, 30, 31	N	3pm - 6pm
Oct 1st	Wellington	W	40,43,46,52, 62	Y	6a-8a
Oct 1st	Wellington	W	40,43,46,52, 62	Y	4p- 6p
Oct 1st	FAU	S	91, 94	Y	6a-8a
Oct 1st	FAU	S	91, 94	Y	6a-8a
Oct 1st	WestTech	W	40, 47, 48	Y	430a-700a
Oct 1st	DT Belle Gl	W	40, 47, 48	Y	600a-800a
Oct 1st	Boca Mall	S	2, 3, 91,92	Y	
Oct 1st	Mangonia	N	20, 31, 33	Y	
Oct 1st	WestTech	W	40, 47, 48	Y	530a-700a

Phase 2 Outreach Summary:

Boca Federation of HOAs
Presentation/Table
Tuesday, 6-5-2018 (830a-930a)

Boynton Beach City Hall
Presentation/Table
Thursday, 6-7-2018 (630p-830p)

Passenger Outreach
West Palm Beach Intermodal
150 N. Clearwater Drive
West Palm Beach, FL
SURVEY/1-on-1
Friday, 6-8-2018 (3p-6p)

Passenger Outreach
Lake Worth CVS Bus Stops #155/#5355
414 Lake Ave.,
Lake Worth, FL
Monday, 6-11-2018 (4p-6p)

Belle Glade SUMMIT
Dolly Hand Cultural Arts Center @ PBSC
1977 SW College Dr., Belle Glade, FL
Monday, 6-11-2018 (530p-730p)

West Palm Beach SUMMIT
Gaines Park
McDonald Wilson Center
1501 N Australian Ave
West Palm Beach, FL
Tuesday, 6-12-2018 (530p-730p)

Boca Raton SUMMIT
FAU Tech Runway
901 NW 35th St.
Boca Raton, FL
Wednesday, 6-13-2018 (500p-730p)
Riviera Beach SUMMIT
City Council Chambers
600 W. Blue Heron Blvd.
Riviera Beach, FL
Thursday, 6-14-2018 (530p-730p)