PALM BEACH COUNTY BOARD OF COUNTY COMMISSIONERS

AGENDA ITEM SUMMARY

	=======================================		
Meeting Date:	November 22, 2016	[X]Consent	========= []Regular []Public Hearing
Department:	Palm Tran		
	I. EXECU	TIVE BRIEF	=============
County Commiss	e: Staff recommends mo sioners of Palm Beach Co gram for Palm Tran pul	ounty, Florida, approvi	ing the 2016 update to
grants to operademonstrate comof 1964 which produced in 201 Circular 4702.1B and procedures excluding or discorporating addition approved by the County's current	Beach County is a recipite the County's public to appliance with the requirement on bits discrimination on the submits a formal Title Vicessary updates to fulfill a 3. The 2016 update included, which was published on that will be taken to ensure that will be taken to ensure all barriers to accessing a Board of County Committe VI Program expires of Justification: New guidermation, but also the ormation, but also the committee of	ransportation services tents outlined in Title V the basis of race, color /I Program to the FTA all Federal obligations udes all of the require October 12, 2012, and ure that Palm Tran proservices and activities imissioners prior to son November 30, 2016 delines require grant reservices and activities and services are services and services are services and services are services are services are services and services are services are services are services are services	s, and is obligated to I of the Civil Rights Actor or national origin. As a every three (3) years and the I was ements outlined in FTA didentifies the policies ovides services without the I origin, or without and I origin, or without a The update must be submittal to FTA. The I countywide (DR)
guidelines into e monitoring of the	ormation, but also the er quantitative standards. T established standards, ar governing board respons	Γhere is also the re nd obtain final approva	equirement to perform al of the entire updated
Attachments:			
1. Resolution 2.2016 Title VI P	rogram Update		
======= Recommended I			
	Executive Direction	ctor FOR CLINTON F	EKBES Date
Approved By:	Calel & d	<u>3</u> /	11/16/16
	Assistant Coun	nty Administrator	Date

II. FISCAL IMPACT ANALYSIS

A. Five Year Summ	ary of Fiscal Impac	et:			
Fiscal Years	2017	2018	2019	2020	2021
Capital	\$0				
Expenditures					
Operating Costs					
External Revenues	(\$0)				
Program Income (County)					
In-Kind Match (County)					
NET FISCAL IMPACT	\$0				
No. ADDITIONAL FTE POSITIONS (Cumulative)	0				
Is Item Included In P Budget Account No. Object <u>Various</u> B. Recommende	: Fund <u>1341</u>	Dept ry	542 Unit		
	Fiscal Review:	Will	Carrigodi Impac Carrigodi Finance Manag	19/25/16	
	III. <u>REV</u>	/IEW COMIV	<u>IENTS</u>		
	and/or Contract Dev	\wedge	rol Comments: Modulate Tract Dev. and Comments	Peur III) 5	116
B. Legal Sufficier Assistant Cou	11/15/16		11/12//le D	<i>"</i>	
C. Other Departm	nent Review:				
Department Di	rector				

Revised 9/03 ADM Form 01 (This summary is not to be used as a basis for payment)

RESOLUTION NO. R -

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF PALM BEACH COUNTY, FLORIDA, APPROVING THE 2016 UPDATE TO THE TITLE VI PROGRAM FOR PALM TRAN PUBLIC TRANSPORTATION SERVICES; ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and 23 CFR part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, the Palm Beach County has an agreement with Palm Tran, Inc., a not-for-profit corporation created by the County to operate and manage the County's public transportation system; and

WHEREAS, Palm Beach County receives FTA grants to operate public transportation services and is, therefore, required to demonstrate compliance with such federal laws and regulations by submitting a Title VI program update once every three years; and

WHEREAS, Palm Beach County seeks to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; and

WHEREAS, Palm Beach County seeks to promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and

WHEREAS, Palm Beach County seeks to ensure meaningful access to transitrelated programs and activities by persons with limited English proficiency; and

WHEREAS, pursuant to federal laws and regulations, the Palm Beach County Title VI Program must be considered and approved by the Palm Beach County Board; and

WHEREAS, revisions have been made to Title VI Program by Palm Tran to reflect recent changes in federal laws and regulations, and to reflect changes in Palm Tran's operations since the last update, all of which are detailed in the 2016 Title VI Program Update, dated November 22, 2016; and

NOW THEREFORE BE RESOLVED, that the Board approves the 2016 Title VI Program Update.

This resolution shall take effect immediately upon its adoption.

Attachment 1 - Page 2 of 2

	The foregoing	g resolution	was of	fered by	Comm	issioner		
who	moved its	adoption.	The	motion	was	seconded	by	Commissioner
		, and up	on bein	g put to a	vote, t	he vote was	as fol	lows:
	District	1						
	District	2 Comm	nissione	r Paulette	Burdio	k		
	District	3						
	District	4 Comm	nissione	r Steven I	L. Abra	ms		
	District	5		•				
	District	6 Comm	nissione	r Melissa	McKinl	ау		
	District	7						
	The Mayor the	ereupon deci	ared the	e resolutio	on duly	passed and	adopt	ed this
	day c	of	-		, 2	2016.		
					PA	LM BEACH	COUN	NTY, FLORIDA
APPROVED AS TO FORM AND					BY	ITS BOARD	OF (COMMISSIONERS
LEGA	AL SUFFICIENC	ÇΥ			Sh	aron R. Bock	k, Cler	k and Comptroller
_				_				
By:	County Attorne			By:	:	D.	enuty.	Clerk
	County / Monn	<i>-</i> ,				יט	cputy	OIGIN

PALM BEACH COUNTY, FLORIDA

PUBLIC TRANSIT SYSTEM

Provider: PALM TRAN

2016 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

NOVEMBER 2016

TITLE VI PROGRAM TABLE OF CONTENTS

	Page
Introduction	3
Title VI Policies	4
Title VI Notice to the Public	12
Notice to the Public- List of Locations	13
Title VI Complaint Procedures	20
Title VI Complaint Form	24
Transit-related Title VI investigations, complaints, and lawsuits	28
Public Participation Plan	34
Language Assistance Plan for Individuals with Limited English Proficiency LEP	38
Transit Committee Membership (Palm Tran Service Board)	43
Monitoring Process of Palm Beach County's Subrecipients for Title VI Compliance	44
Service Standards - Monitoring Transit Service	45
Demographic and Service Profile Maps	60
Results of Service and/or Fare Equity Analyses Conducted Since the Last Title VI Program Submission	66
Evidence that Palm Beach County Board of Commissioners Approved The Title VI Plan (Title VI update going to the BCC on November 22, 2016)	

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. 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, a not-for-profit corporation created as an instrumentality of the County.

The purpose of the update is to describe how Palm Tran, in conjunction with Palm Beach County, 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-three fixed routes serve areas throughout the County. Service is provided weekdays from 5 a.m. to 10 p.m., on Saturdays from 6 a.m. to 10 p.m., and on Sundays from 8 a.m. to 5 p.m. There is no service on six major holidays. Palm Tran contracts with one private operator 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 1.3 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.

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.

2) Fare Equity Analysis

c. Fare Equity Analysis for Minority Populations

- i. Use the fare change 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. 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.

d. 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. Use the fare change 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. 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:
 - 1. Use the minority transit route definition and select a sample of minority and non-minority routes.
 - 2. Assess the performance of each minority and non-minority route in the sample for each service standard and service policy.
 - 3. Compare transit service observed to the established standards and policies.
 - 4. Mitigate as needed to ensure service standards and service policies are being met.
 - 5. Brief and obtain approval from the Palm Tran Service Board.
 - 6. 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 were 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) 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 WGS 1984 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: Public Information Supervisor

3201 Electronics Way

West Palm Beach, FL 33407

Call: 877-930-4287

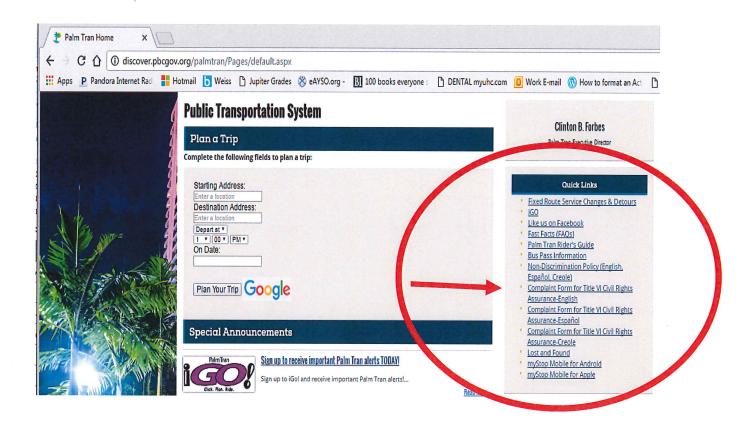
Email: PT-ADA@pbcgov.org

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



Complaint Form for Title VI Civil Rights

ENGLISH

(Español P. 2) (Creole P. 3)

FEDERAL TITLE VI CIVIL RIGHTS ASSURANCE 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

email: PT-ADA@pbcgov.org

West Palm Beach, FL 33407

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.
- Your address and information as to how Palm Tran should contact you (e.g., your telephone number, e-mail address, home address, etc.).
- 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.

ESPAÑOL

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 (Titulo 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 (Titulo 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 Titulo VI o ADA, contáctenos:

Llámenos:

877-930-4287

Palm Tran

Correo Electrónico: PT-ADA@pbcgov.org

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 nesesè yo nan lòd yo ki pèmèt moun nan yo itilize sèvis Palm Tran la.

Si ou ta gen nenpôt 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 fê 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.
- Adrès ou ak enfòmasyon; epi di kòman Palm Tran dwe kontakte ou (egzanp, nimewo telefòn, adrès imèl ou, adrès lakay ou, elatriye).
- dekri teren 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 enfomasyon yon temwen.
- 4. Ou dwe siyen plent ou a. Tanpri eksplike byen klê ki posib sa ki te pase, poukisa ou kwê li te rive, ak ki jan yo te fê diskriminasyon kont ou. Tanpri idantifye nenpôt lôt moun ki te enplike oswa obsève ensidan an. Asire ou ke ou eksplike kouman lôt 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 is the format used for display in all the buses.

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

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 Titulo VI del Acta de los Derechos Civiles de 1964 (Titulo 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 (Titulo 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, duda o si cree que ha sido sujeto a discriminación bajo el Titulo VI o ADA, comience el proceso de queja comunicándose con:

Palm Tran

Attn: Public Information Supervisor 3201 Electronics Way

West Palm Beach, FL 33407

Llámenos: 877-930-4287 Correo Electrónico: PT-ADA@pbcgov.org

www.palmtran.org

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 konfomite plen ak Tit VI nan Iwa 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, koulé, 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 enfomasyon sou poukisa se modifikasyon yo mande a nesesè yo nan lòd yo ki pèmèt moun nan yo itilize sèvis Palm Tran Ia.

SI ou konsene, oubyen sI ou genyen yon kesyon oubyen sI yo fe diskriminasyon avew anba laiwa Title VI ou ADA, kontakte nou:

Palm Tran

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

Rele noun nan: 877-930-4287 Imèl: PT-ADA@pbcgov.org www.palmtran.org

REVISED JULY 2015

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



Table of Contents

Executive Executive Executive	Helpful Information	地区2000年代,1000年代	
Getting Started2	Palm Tran's App16	Shopping Centers and Malls	19
Ride By The Rules &	Customer Service16	Tri-Rail Information	19
Rider Code of Conduct3	Lost and Found16	Martin County Public Transit	19
Cash Fares & QUIK Passes4	Park and Ride Locations17	Transit Watch Security	20
Fixed Route Español Translation6	Intermodal Transit Center17	Palm Tran Service Board	20
Fixed Route Creole Translation10	Library Locations18	Hurricane Information	20
Palm Tran CONNECTION14	Colleges and Universities18	Holiday Schedule	21
Transportation Disadvantaged15	Emergency Ride Home18	Non-Discrimination Policy	22

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 discrimfination on the basis of race, color, sex or

national origin (Title VI) or because of an individual's disability (ADA).

<u>Modifications to Policies and Procedures:</u> 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

Titulo VI Garantia 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 Titulo VI del Acta de los Derechos Civiles de 1964 (Titulo 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 (Titulo 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 tinanciero 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 que la modificación es necesaria para poder usar los servicios de Palm Tran.

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 comunicandose con:

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

Hámenos: 877-930-4287 - Correo Bectrónico: PT-ADA@pbcgov.org - www.palmtran.org

Palm Tran's Pa fè diskriminasyon politik Tit Federal VI Dwa Sivil Asirians Avi sou American ki andikape Act

Palm Tran ayêk pwal bay avî piblik ke li se politik Palm Tran a asîre kontômîte plen ak Tit Vî nan iwa sou dwa Sivîl 1964, ak Amerîk yo ayêk Disabilities Act (ADA). Palm Tran se angaje nan asîre ke pa gen okenn moun se eskli nan patisipasyon nan, oswa refize benefis ki genyen nan sêvîs li yo, oswa yo kapab sibi diskrimînasyon sou baz ras, koulê, sêks oubyen orijîn nasyonal oswa paske nan andîkap yon moun.

Modifikasyon Réglémen ak Pwosedi: Palm Tran prail fé tout modifikasyon rezonab sou politik yo ak pwogram nan pou asire ke moun ki gen andikap gen yon opôtinite egal a jwi tout nan pwogram li yo, sévis ak aktivite. ADA a pa mande pou Palm Tran pran okenn aksyon ki ta fondamantalman chanje nati a nan pwogram li yo oswa sévis, oswa enpoze okenn soutwans chay finansye oswa administratif. Chak fiva sa posib, demann pou modifikasyon ta dwe fé an davans. Demann lan soti nan moun man ki gen yon andikap yo ta dwe detay espesifik otank posib epi yo genyen ladan enfomasyon sou poukisa se modifikasyon yo mande a nesesé yo nan lód yo ki pémét moun nan yo kitige sévis Palm Tran la.

Si ou konsene, outyen si ou genyen yon kesyon outyen si yo fe diskriminasyon avew anba lalwa Title VI ou ADA, kontakte nou:

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

Call: 877-930-4287

Email: PT-ADA@pbcgov.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 defined 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 Title VI Complaint Form

Palm Tran will investigate complaints received no more than 180 days after the alleged incident. The Complaining Party (CP) will receive an acknowledgement letter confirming that the complaint will be investigated. Palm Tran has 30 days to investigate 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 to send requested information to the 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 Outreach Manager to classify Title VI customer complaints as 'priority' and forward them to the Senior Manager of Organizational Development and Customer Relations and Operations Manager for processing and investigation, respectively.
- 2. It shall be the responsibility of the Senior Manager of Organizational Development and Customer Relations to coordinate all correspondence with the Complaining Party (CP), including, but not limited to the Notification of Investigation and Closure Letter if no finding is made. The Senior Manager of Organizational Development and Customer

Relations 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 days of initial contact from the Complaining Party.
- b. The Closure Letter will be sent to the Complaining Party within five days of the completion of the investigation.
- 3. It shall be the responsibility of the Operations Manager to coordinate all aspects of the investigation, including but not limited to interviews with staff members and review of audio/video or other evidence.
 - a. Investigations will be completed within ten days of initial contact from the Complaining Party.
 - b. Request for time extensions will be directed to the Senior Manager of Organizational Development and Customer Relations as needed.
- 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 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 Outreach Manager to track Title VI complaints in the COM system. Quarterly reports shall be sent to the Senior Manager of Organizational Development and Customer Relations for reconciliation.
- 2. It shall be the responsibility of the Senior Manager of Organizational Development and Customer Relations to track Title VI investigations and lawsuits. The list shall include the date the investigation or lawsuit was filed, summary of the allegation and status of the investigation or lawsuit. This list shall be included in the Title VI Program 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 Title VI 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 Title VI 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 the Title VI Assurance in the Rider's Guide.
- 3. It shall be the responsibility of the Maintenance Manager to post the Title VI Assurance is all new buses.

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.



Title VI Complaint 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, the Title VI Coordinator will assist you to do so at a mutually convenient time. Simply call to make your request. If the Title VI Coordinator 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 \(\sigma\) NO \(\sigma\) (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 □ b. Color □ c. National Origin □



o. What date did the anog	ed discrimination take plac	, ,	
(Must be within the past 18	0 days)		
	scribe the alleged discriming ible. Be sure to include h		
(Use more sheets or the ba	ack of this page, if needed)		
7. (For internal complaints grievance procedures at F (If you answered NO to this			•
If yes, what is the status of t	the grievance?		
,			
Name and title of the persor	n who is handling the grievar	nce procedure.	
Name	Title		
8. Have you filed this com federal or state court? (If I	plaint with any other feder NO please go to item 10)	al, state, or local ag YES □	ency; or with any NO □
If yes, check all that apply:	Federal agency	Federal court	State court
	State agency	Local agency	



complaint was filed.
Name
Street Address
City, State, and Zip Code:
Telephone Number ()
10. Has the Title VI complaint been filed with the Palm Tran before? YES □ NO □
If yes, when? Date
11. Have you filed any other discrimination complaints with the Palm Tran? YES □ NO □
If yes, when and against whom were they filed?
Date
Agency
Street Address
City, State, and Zip Code
Telephone Number ()
12. 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 – Title VI Complaints,
3201 Electronics Way, West Palm Beach, FL. 33407

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 none of the complaints have been validated as a Title VI violation.

Palm Beach County has no records of lawsuits alleging Title VI violations in years 2014, 2015 and 2016 (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
Hestin Demeritte	81895	8/8/13	Race discrimination	Passenger stated that the driver made racial comments to him. Package sent on 8/12/13 certified returned as an invalid address. Complaint was investigated, no finding due to lack of audio. No finding. CLOSED.
Grayling Daniels	82674	9/03/13	Race discrimination	Title VI acknowledgement letter and forms mail on 9/04/13. Complaint was investigated and deemed invalid. Finding letter mailed on 9/26/13. CLOSED
Ms Rios	85595	10/29/13	Race discrimination	Investigated deemed –Not Valid. CLOSED
Jewell McKay	87043	12/5/2013	Race discrimination	This complaint never escalated to a complaint. She withdrew it and asked that it does not get filed. CLOSED
James Shaver	88064	12/23/13	Race discrimination	There was no contact information to send packet to. However, the complaint was entered in the system and closed. CLOSED

David Stickney	87861	12/18/13	Race discrimination	Mailed packet on 12/17/13. No response back from the passenger, address incorrect. Tried to contact passenger to no avail. Put into system and found not valid on `1/14/14. CLOSED
Debra Carmona	88216	12/23/13	Race discrimination	Mailed packet. No response. Put into system, found not valid. CLOSED.
Joni Monson	89218	1/9/2014	Race discrimination	Sent packet on 1/14/14. Found not valid, sent not valid letter on 1/29/14. Both letters came back as unclaimed. CLOSED.
Juan Ochoa	90331	2/5/14	Race discrimination	Sent packet out certified and regular mail on 2/5/14. Packet signed and received by passenger on 2/8/14. Passenger did not return the complaint form. February 20th complaint investigated and found not valid. Letter of no findings sent on 2/20/14 regular and certified mail. Complaint not valid. CLOSED.
James Miller	92768	4/1/2014	Race discrimination	Sent packet out certified and regular mail on 4/1/14. Returned receipt form received 4/7/14 Passenger did not return the

				complaint form. April 16th complaint investigated and found not valid. Letter of no findings sent on 4/15/14 regular and certified mail. Complaint not valid. CLOSED.
Joseph Akowskey	95051	6/362014	Race discrimination	Sent packet out certified and regular mail on 6/3/14. Passenger did not return Title VI form. No response from passenger. Letter of no findings sent (certified & regular) 6/18/14. Returned on 7/14/2014. Complaint not valid. CLOSED.
Jose Hernandez	96130	7/03/2014	Race discrimination	Sent packet out certified and regular mail on 7/9/2014. Package returned undeliverable 7/15/14. Letter of Findings sent 7/17/14 certified and regular mail. Letter of Findings returned undeliverable 7/26/14. Complaint ruled - validity undetermined. CLOSED.
Viviana Villarreal	98366	09/13/2014	Race discrimination	No address listed on complaint form. Called customer at the number on complaint: 9/14, 9/15,9/18 and left several voicemails. Customer has yet to respond. CLOSED.

John Marx	101000	11/20/2014	discrimination	No address listed on complaint form. Called customer at number on complaint 12/01/2014. Customer state he's homeless and has no address. CLOSED.
Amy Montgomery	101771	12/15/2014	Race discrimination	No address listed on complaint form. Called customer at number on complaint 12/15/2014. CLOSED.
Elmer Gomez	102571	01/08/15	Discrimination	Sent packet out certified and regular mail on 01/27/15. Passenger did not return the complaint form. January 29th complaint investigated and found not valid. Letter of no findings sent on 02/19/15 regular and certified mail. CLOSED.
Adam Havens	110083	08/18/15	Discrimination	Sent package out certified and regular mail on 09/04/15. Passenger called for a follow-up to see if he got Title VI packet (no answer left voicemail). Title VI package certified came back "Return to Sender" 9/28/15. A letter of no findings mailed 9/28/15 certified and regular mail 9/28/15. CLOSED.

Rebecca Howe	111094	09/23/15	Discrimination	Packaged mailed out certified and regular mail 09/23/15. A letter of no findings mail out 10/15/15 certified and regular mail. CLOSED.
Iris Mendoza	116893	05/13/16	Discrimination	Package mailed out certified and regular mail 05/17/16. A letter of no findings mailed out 06/09/16 certified and regular mail. CLOSED.
Rudy Trevino	116515	05/02/16	Discrimination	Package sent via e-mailed 05/23/16. An e-mail of no findings was sent via e-mailed 06/08/16. CLOSED.
Martin Lopez	117922	06/24/16	Discrimination	Mr. Lopez came in and filled out the package in person on 06/24/16. A letter of no findings mail certified and regular mail on 07/05/16. 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 System, appropriate public comment is solicited and considered in accordance with applicable federal, state and local law. This PPP also identifies strategies and processes to ensure effective public and stakeholder notice and participation, as appropriate, in Palm Tran transportation planning activities.

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 Metropolitan Planning Organization (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
- 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.

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 Major Service Change is proposed

No Major Services Changes have been implemented since September 2013

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.

- 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.

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

INTRODUCTION

Palm Tran fixed-route network has grown to a 33 route network serving Palm Beach County, the paratransit service is operated within three-quarters of a mile from the fixed route service, within Palm Beach County. Palm Tran service is available in the eastern portion of the county as far north as the Town of Jupiter and as far south as the City of Boca Raton with one route crossing to Broward County connecting with Broward Service. One route travels to the western boundary of the County where it connects with two circulator routes that serve the rural communities of Belle Glade, Pahokee, Canal Point and South Bay.

In providing fixed-route service within a service area of 1,320,134 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 161,467 residents or 12.23% that describe themselves as not able to communicate in English very well (Source: U.S. Census). 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 16, 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 Census data.

The table below displays the primary language and number of individuals 18 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,	1,320,134	100%		
Florida				
Population Speak English less than "very well"				
Primary Language at Home				
Spanish	101,034	7.65%		
French Creole	32,139	2.43%		
Portuguese	4,542	0.34%		
French (incl. Patois, Cajun)	3,980	0.30%		

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". 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 5.05% of the calls for Paratransit reservations chose the option for Spanish, compared to 1.14% of the calls for Fixed Route customer service. 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.

40

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

On-Board surveys conducted to develop the 2016 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 already provides an option to select Spanish from the menu. Front desk staff has the option to contact a staff member should an LEP individual require assistance at the front desk. The Paratransit reservation center now has a staff person that is 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 Marketing Department.

Providing Notice to LEP Persons

Based on Palm Tran self-assessment of LEP persons that come in contact to 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 continue 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 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 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., Clayton Hutcheson Center, 559 N. Military Trail, 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	74%	19%	17%	2.00%	0.60%	4.00%
Palm Tran Service Board September 2016 12 of 13 seats are assigned	66%	0%	17%	0%	0%	17%

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 dependant 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

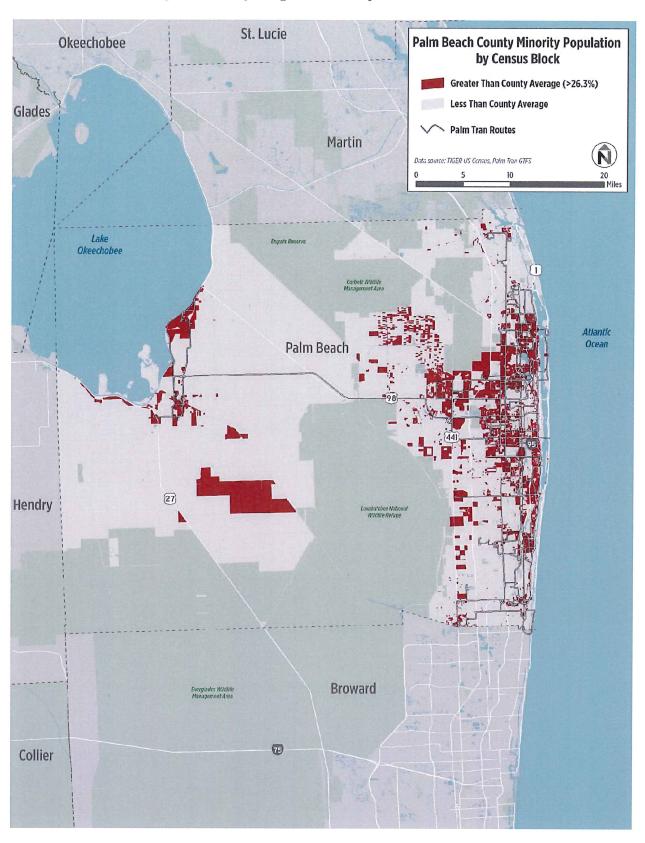
In order to ensure compliance with DOT's Title VI regulations, FTA requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years.

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, 26.3% of county residents are considered minority. All census blocks were identified in Palm Beach County where the minority population exceeds 26.3%, as shown below.

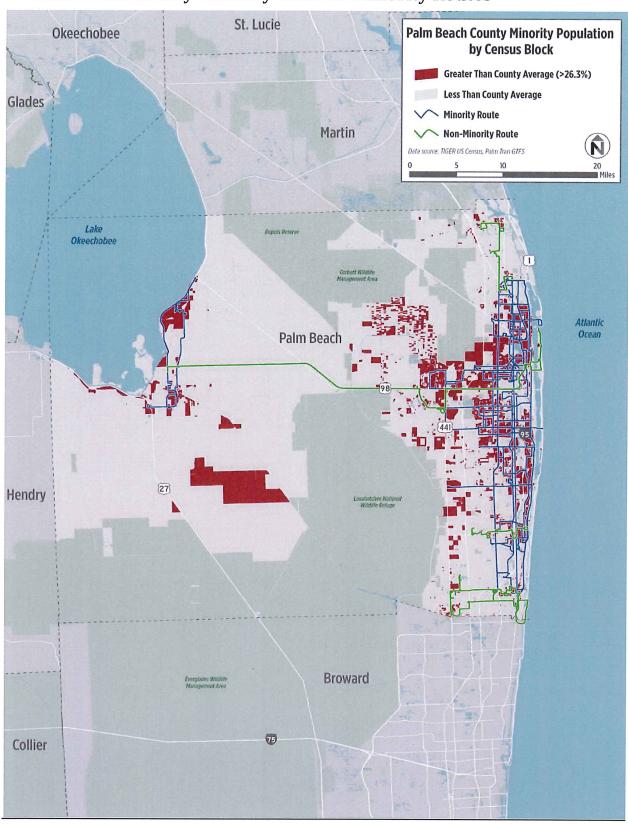
Palm Beach County Minority Population by Census Block



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 26.3% minority population were classified as Minority routes, and the remaining Palm Tran routes are identified as Non-Minority routes. Based on this analysis, 28 of Palm Tran's 34 routes are classified as Minority routes.

ROUTE	NAME	% MILEAGE IN MINORITY BLOCKS	MINORITY ROUTE?
1	US 1 - Palm Beach Gardens to Boca Raton	44%	Minority
2	Congress Ave - PBG to Boca Raton	42%	Minority
3	Military Trail - PBG to Boca Raton	50%	Minority
4	Haverhill Rd - WPB to Greenacres	87%	Minority
10	North County Crosstown	11%	Non-Minority
20	PBG Crosstown to Mangonia Tri-Rail	45%	Minority
21	PBG Crosstown to St. Mary's Hospital	49%	Minority
30	Blue Heron Blvd - Riviera Beach Crosstown	47%	Minority
31	45 th St - WPB Crosstown	80%	Minority
33	Australian & PB Lakes Blvd - Lake Park to WPB	83%	Minority
40	SR 80 - WPB to Belle Glade (Limited Stop Service)	14%	Non-Minority
41	WPB to Palm Beach Inlet	21%	Non-Minority
42	Belvedere Rd - WPB Crosstown to Military Trail	37%	Minority
43	Okeechobee Blvd - WPB to Wellington	52%	Minority
44	Belvedere Rd - WPB Crosstown	56%	Minority
45	Parker, Lake&FLA Mango- WPB to Lake Clarke Shores	34%	Minority
46	Forest Hill Blvd - WPB to Wellington	43%	Minority
47	SR 15 - Pahokee to Belle Glade	57%	Minority
48	SR 715 - South Bay to Canal Point	68%	Minority
49	PB Lakes Blvd & Congress - WPB - Westgate	83%	Minority
52	Royal Palm Beach Crosstown	63%	Minority
60	Purdy and 10 th Ave N - Greenacres to Lake Worth	73%	Minority
61	Cresthaven and 10 th Ave N - Greenacres to Lake Worth	60%	Minority
62	Lake Worth Rd - Wellington to Lake Worth	38%	Minority
63	Lantana Rd - Lantana Crosstown	63%	Minority
64	Melaleuca/6 th Ave South - Greenacres to Lake Worth	73%	Minority
70	Seacrest Blvd - Lantana to Delray Beach	67%	Minority
71	Lawrence Rd - Boynton Beach Crosstown	79%	Minority
73	Boynton Beach Blvd - Boynton Beach Crosstown	40%	Minority
80	Lake Ida Rd & Linton Blvd - Delray Beach Crosstown	62%	Minority
81	Atlantic Ave - Delray Beach Crosstown	33%	Non-Minority
91	Glades Rd - Boca Raton Crosstown	27%	Non-Minority
92	Palmetto Park - Boca Raton Crosstown	8%	Non-Minority
94	FAU to Boca Raton Tri-Rail	40%	Minority

Palm Beach County Minority and Non-Minority Routes



<u>On-Time Performance</u>: 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 one minute early up to five minutes late. The goal for on-time performance is 80 percent.

This standard has not been modified since September 2013

Palm Tran monitors on-time performance using Automatic Vehicle Locator (AVL) data transmitted from transit vehicles. Service is considered "on-time" if a bus arrives at a route time-point no more than one minute early and no more than five minutes late. Palm Tran's systemwide goal for on-time performance is 80%, and the threshold for disparate impact is 10% above or below the systemwide average performance.

Systemwide average on-time performance is 84.26%, which is above the 80% goal. Minority routes also exceed this goal, performing close to average at 83.93% ontime. At 0.34% below the systemwide average performance, on-time performance for Minority routes is well below the threshold for disparate impact. Non-Minority routes on-time performance is 1.9% above that for Minority routes, at 85.83% ontime average performance.

Average On-Time Performance

	AVERAGE ON-TIME PERFORMANCE	AVERAGE ON-TIME PERFORMANCE NOT MEETING 80%
	AT 80% OR ABOVE	STANDARD
Systemwide	84.26%	15.74%
Minority	83.93%	16.07%
Non-Minority	85.83%	14.17%

Six routes, of all Palm Tran routes, have on-time performance below the 80% goal. Five of these routes are Minority routes. These numbers reflect an improvement from 2014 when nine routes were performing below the 80% goal.

⇒ 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) Limited Stop: Is service that has fewer stops and operates at a higher speed than trunk and cross-town service. Limited routes tend to serve outlying areas and this service is characterized by less frequent stops.

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 limited-stop routes. Off-peak weekday and weekend schedules should have a minimum of 60-minute headways.

No Major Services Changes have been implemented since September 2013, headways have not been changed for any of the Palm Tran routes. This standard has not been modified since September 2013

Routes	Routes	Weekday	Weekday	Weekend
Category	Routes	Peak	Base	Base
Trunk Routes	1 - 2 - 3 - 31 - 43 - 46 - 62 - 70	30	60	60
	4 - 10 - 20 - 21 - 30 - 32 - 41 - 42 -			
	44 - 45 - 47 - 48 - 52 - 53 - 54 - 55 -			
	60 - 61 - 63 - 71 - 72 - 79 - 80 - 81 -			65
Cross-Town Routes	91 - 92 - 94	60	60	60
Limited Stop	40	60	60	60

Average Headways

Trunk Routes: All 8 Trunk Routes are minority routes, 7 of the routes performing at 83% on-time performance and above. The average scheduled headway for Palm Tran Trunk Routes is 29 minutes for peak time during the week.

SystemWide: The average scheduled headway for Palm Tran routes is 47 minutes on weekdays, 58 minutes on Saturdays, and 60 minutes on Sundays. The average headways for Minority routes are nearly identical to the systemwide averages, indicating no disparate impact in scheduled service frequency. Headways on Non-

Minority routes average 57 minutes on weekdays, which is 10 minutes higher than the systemwide average. Service operates every 60 minutes on Saturdays, slightly higher than the system wide average, while Sunday headways is equivalent to the Palm Tran system average of 60 minutes.

Average Headways

	WEEKDAY	SATURDAY	SUNDAY
Systemwide	47	58	60
Minority	46	58	60
Non-Minority	57	60	60

Just over half of Palm Tran routes operate every 60 minutes on weekdays, including three Non-Minority routes and 15 Minority routes. 13 Palm Tran routes operate with frequencies of 30 minutes or less on weekdays, and all but one of these are Minority routes. One Non-Minority route (Route 91) operates every 45 minutes, while another (Route 41) operates only seven trips per day during peak hours. One Minority route (Route 20) operates every 75 minutes on weekdays.

Saturday service is more uniform, with most routes operating every 60 minutes. The exceptions include two Minority routes that operate every 30 minutes (Route 1 and Route 3) 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) and Route 70 (every 90 minutes), both of which are Minority routes.

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

<u>Vehicle Loadings</u>: 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.

Vehicle Load for Palm Tran Buses

Vehicle Type	Seated Capacity	Standing Capacity	Maximum Load	Vehicle Load Ratio
29' Gillig	23	11	35	1.5
35' Gillig	32	16	48	1.5
40' Gillig	37	18	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 systemwide is 0.27, while the average maximum vehicle load systemwide (an average of the highest load of each route) is 0.59. Minority routes have a slightly higher average load (0.29), while Non-Minority routes are slightly lower (0.21). Minority routes and Non-Minority routes both have an average maximum load of 0.59, equivalent to the systemwide average maximum load.

Vehicle Load

	AVERAGE LOAD	MAXIMUM LOAD
Systemwide	0.27	0.59
Minority	0.29	0.59
Non-Minority	0.21	0.59

While most routes have average loads and maximum loads below 1.0, there are four routes that are below the 1.5 threshold but have a maximum load over 1.0. All four of these routes are Minority routes (Route 1, Route 2, Route 43, and Route 94),

accounting for 14% 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 2 has the highest maximum load among all Palm Tran routes, and is also the route with the highest average load (0.67). Route 2 currently operates a maximum vehicle capacity of 37 passenger seats.

Maximum Vehicle Load over 1.0

	AVERAGE LOAD	MAXIMUM LOAD
Minority		
Route 1	0.45	1.07
Route 2	0.67	1.18
Route 43	0.63	1.01
Route 94	0.29	1.13

⇒ 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 ¾-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 ¾-mile walk of service, indicating that Palm Tran exceeds its goal for service availability to minority residents.

Service Availability

数是是"多级"。	All County Residents	Minority Residents Only
Share of population within ¾-mile of service	79.8%	90.6%

All Palm Tran routes operate on weekdays, with an average of 13.1 hours of service per route. Minority routes operate an average of 13.4 hours of service, slightly higher than the system average, while Non-Minority routes operate 11.6 hours of service per weekday.

On Saturday, all routes operate an average of 10.1 hours of service, with Minority routes operating slightly less (10.0 hours) and Non-Minority routes operating slightly more (10.4). Three Minority routes do not operate on Saturdays: Route 42, Route 60, and Route 94.

Average Daily Hours of Service

	WEEKDAY	SATURDAY	SUNDAY
Systemwide	13.1	10.1	4.2
Minority	13.4	10.0	4.5
Non-Minority	11.6	10.4	2.4

Significantly less service is provided systemwide on Sundays. On average, Palm Tran routes provide only 4.2 hours of service on Sundays, with 4.5 hours on Minority routes and only 2.4 hours on Non-Minority routes. Only 19 of Palm Tran's 34 routes operate on Sundays: 17 of these are Minority routes (accounting for 60% of all Minority routes) and two are Non-Minority routes (accounting for one third of all Non-Minority routes).

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

<u>Vehicle Assignment</u>: 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 4.6 years, which indicates a threshold for disparate impact at 6.9 years. The current average age for Minority route vehicles is 4.9 years, which is slightly above the system average and two years below the threshold. Non-Minority route vehicles are an average of 4.8 years, slightly above the average age of all Palm Tran vehicles.

The average age of all Palm Tran vehicles is currently 4.6 years, which indicates a threshold for disparate impact at 6.9 years. The current average age for Minority route vehicles is 4.9 years, which is slightly above the system average and two years below the threshold. Non-Minority route vehicles are an average of 4.8 years, slightly above the average age of all Palm Tran vehicles.

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	Average Vehicle Age
Palm Tran Fleet	4.6
Minority	4.9
Non-Minority	4.8

On six of Palm Tran's 34 routes, the average assigned vehicle age exceeds the 6.9 year threshold. Four of these routes are Minority routes and two are Non-Minority. One Minority route (Route 60) and one Non-Minority route (Route 41) both have an average assigned vehicle age of 11 years. Overall, less than one-fifth of Palm Tran routes exceed the vehicle age threshold of 6.9 years, including 14% of Minority and one third of Non-Minority routes.

Assigned Vehicle Age over 6.9 Years

	AVERAGE VEHICLE AGE
Minority	
Route 21	7.3
Route 45	9.5
Route 46	7.1
Route 60	11.0
Non-Minority	
Route 41	11.0
Route 81	8.3

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

<u>Distribution of Transit Amenities</u>: 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 3,201 bus stops in the Palm Tran system, and 1,549 stops (48%) have at least one type of amenity (a bench and/or shelter); 83.6% of these stops are located in Minority Routes. Systemwide, stops on Minority routes, 40.49% of stops have an amenity, compared to 7.9% of Non-Minority stops. Minority Routes account for 82.35% of the system.

Distribution of Transit Amenities

	STOPS WITH ANY AMENITY	STOPS WITH BENCHES	STOPS WITH SHELTERS
Systemwide	48.39%	29.12%	19.28%
Minority	40.49%	25.05%	15.43%
Non-Minority	7.9%	4.06%	3.84%

⇒ 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 and contemplation of service change proposals, moderate and major service changes are to be brought to the Palm Tran Service Board for approval.

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 minor and major service change decisions
- An annual comparative assessment for major alterations

Annual Service Budget Proposal

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 major, moderate, and minor 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.

Minor and moderate service changes are assessed within Planning and Scheduling through the Route Review Committee and can be executed throughout the year, in agreement with Route BIDs, and PTSB approval. Major Service changes must undergo an annual review, public hearing process and may be executed only once a year. These changes affect the budget and vehicle requirements and necessitate approval from the Board of County Commissioners.

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.

2016 Title VI Update General Review Conclusions

- Most of Palm Tran's fixed routes are considered Minority routes (28 out of 34 routes, or 82%).
- Approximately 30% of Palm Beach County's population is considered minority.

ON-TIME PERFORMANCE

- 23 of the 28 Minority routes perform above the agency's threshold for on-time performance (80% on time).
- 17.65% of the Routes (6) are below the 80% goal.

SERVICE FREQUENCY (Headway)

• Scheduled service frequency on Minority routes is equal to or slightly better than systemwide averages on all days; Non-Minority routes average longer headways on weekdays, and similar or equal headways on Saturday and Sunday compared to the systemwide averages.

VEHICLE LOAD

- Vehicle loads on minority routes are well below the established threshold for vehicle loading and are close to the systemwide average for vehicle age.
- Although no Palm Tran route exceeds the established threshold for vehicle loads, four Minority routes (14% of all Minority routes) exhibit maximum load ratios of greater than 1.0: Route 1, Route 2, Route 43, and Route 94.

SERVICE AVAILABILITY

- Approximately 80% of Palm Beach County's population resides within ¾ 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 ¾ of a mile of service, well above the agency's goal for service availability.
- 25 of the 28 Minority routes (89%) operate on Saturday, compared to 6 Non-Minority routes (100%). 17 Minority routes (61%) operate on Sundays, compared to 2 of the 6 of Non-Minority routes (33%). Service hours provided on Minority routes equal or exceed the systemwide average service hours.

VEHICLE ASSIGNMENT

- Vehicles assigned to Minority routes vehicles average 4.9 years old, which is two years below Palm Tran's threshold of 6.9 years and slightly above the system average.
- Four Minority routes (14% of all Minority routes) have average vehicle ages that exceed the established threshold. This is compared to two are Non-Minority routes (33% of all Non-Minority routes) that exceed the vehicle age threshold. In addition, one Minority route and one Non-Minority route both have an average assigned vehicle age of 11 years.

DISTRIBUTION OF TRANSIT AMENITIES

- The share of bus stops on Minority routes with amenities (40.49%) is below the share of all Palm Tran bus stops with amenities (48.39%).
- However, out of the 1,549 stops with amenities, 83.67% of this 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.

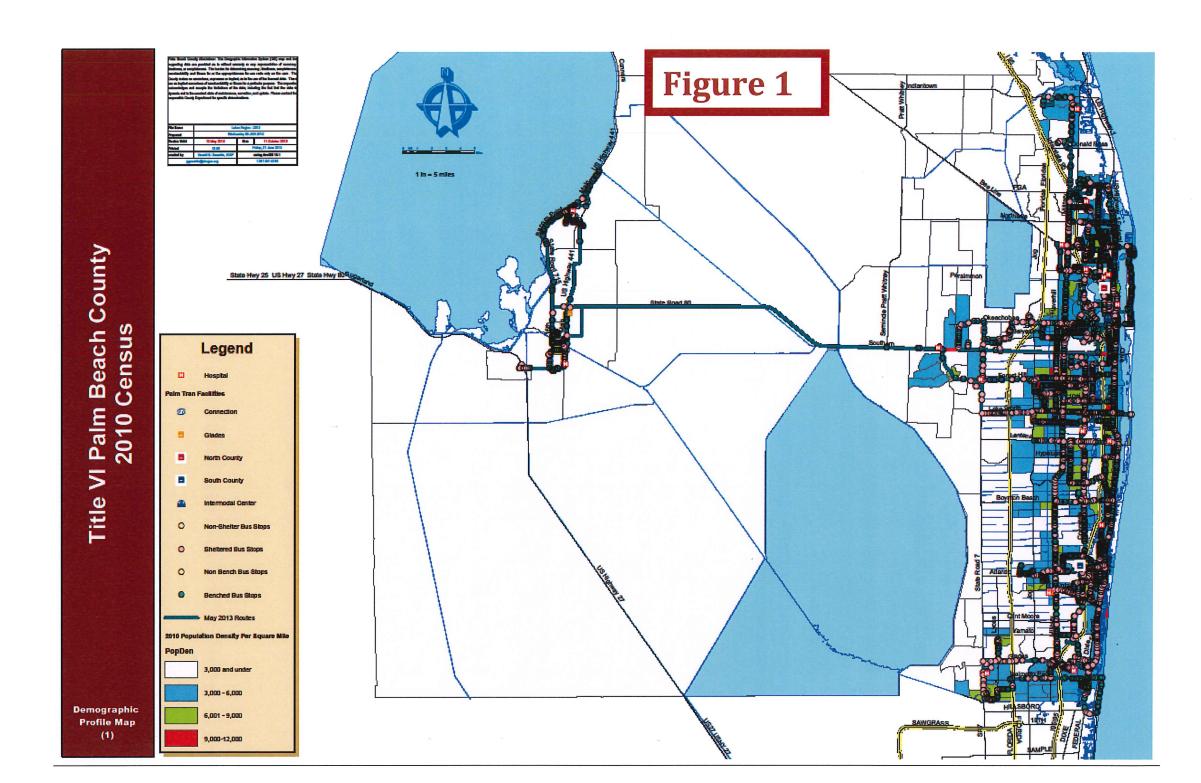
In 2010, the U.S. Census identified 1,320,134 residents in Palm Beach County. The minority population includes African Americans, Asians, American Indians, Pacific Islanders, people of Hispanic or Latino origin, other non-white races, and persons of two or more races. In Palm Beach County, 26.51% of the residents were members of minority groups in 2010. 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, 19% of the residents identified themselves as of Hispanic origin, regardless of race.

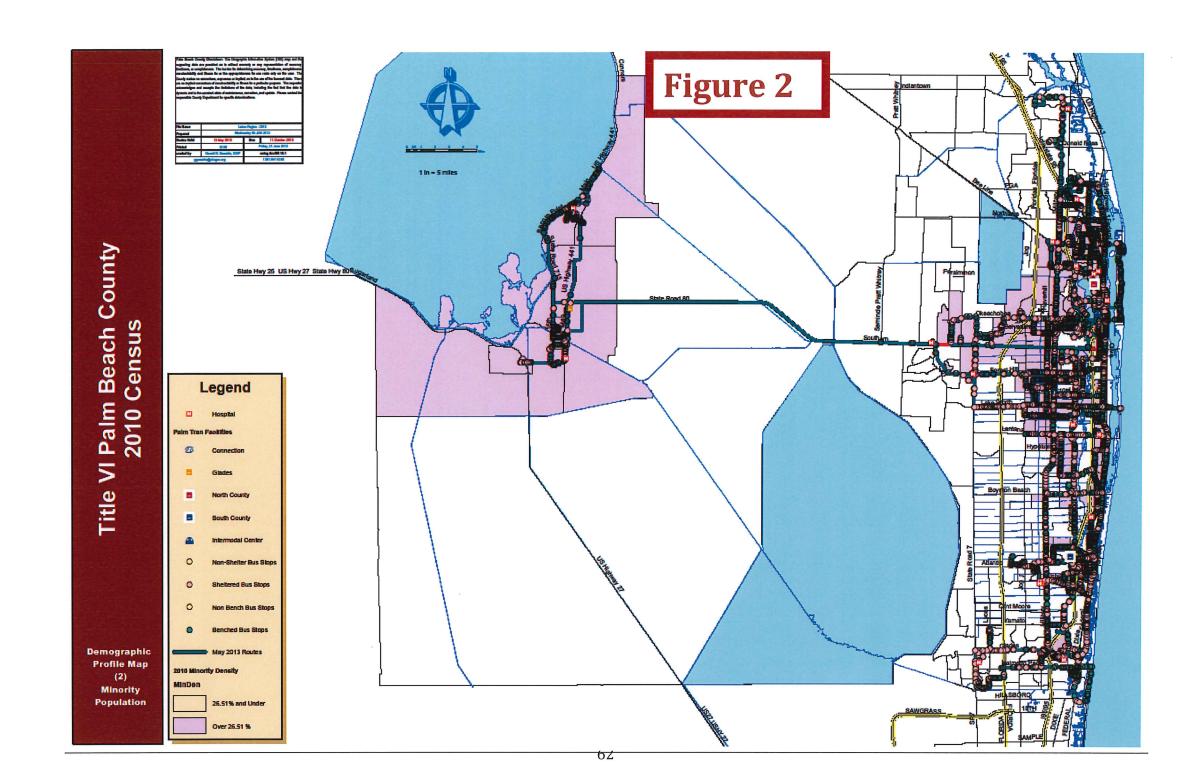
Figure 1 is a base map of Palm Beach County which is Palm Tran's service area. The map overlays census tracts, population density by census tracts, transit facilities—including transit routes, transit stops and stations, depots, maintenance and garage facilities, and administrative buildings, as well as major streets and highways.

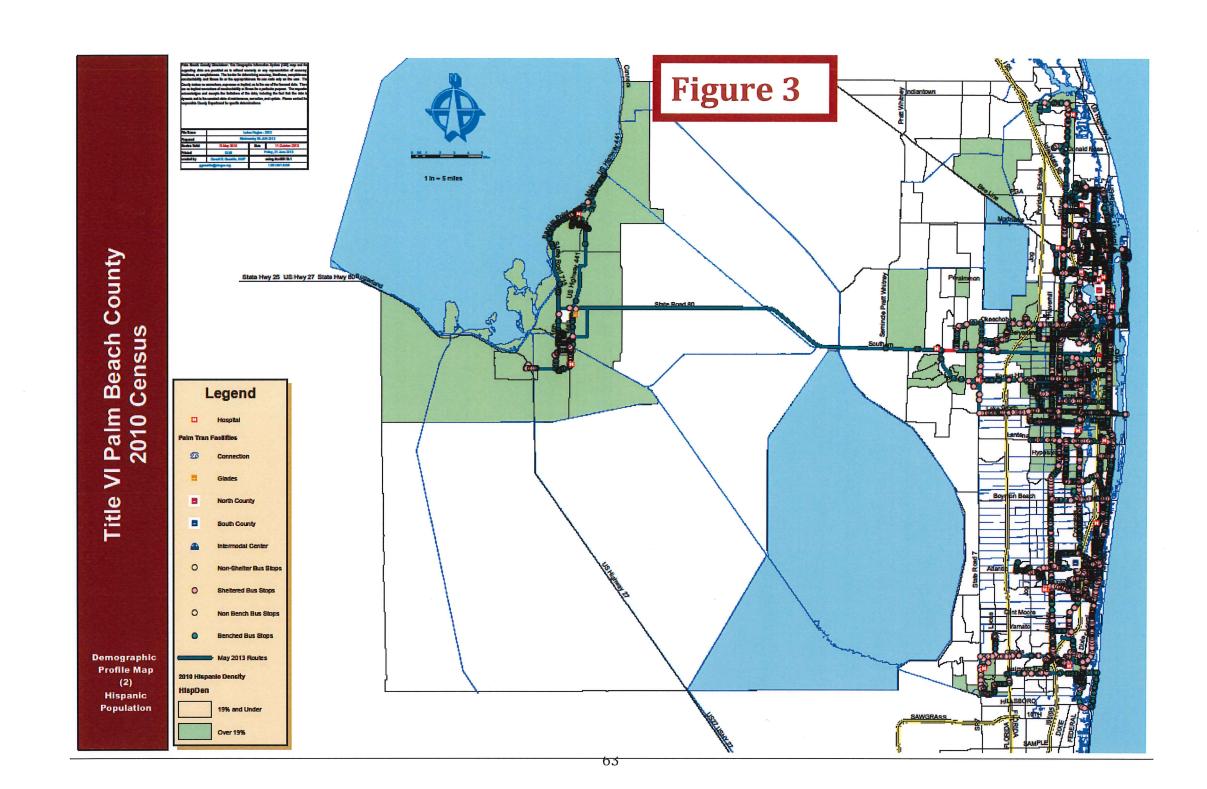
Figure 2 is a demographic map that plots the information listed in Figure 1 above (minus population density) and also shades those Census tracts, where the percentage of the total minority population residing in Palm Beach County exceeds the average (26.51%) percentage of minority populations for the service area as a whole.

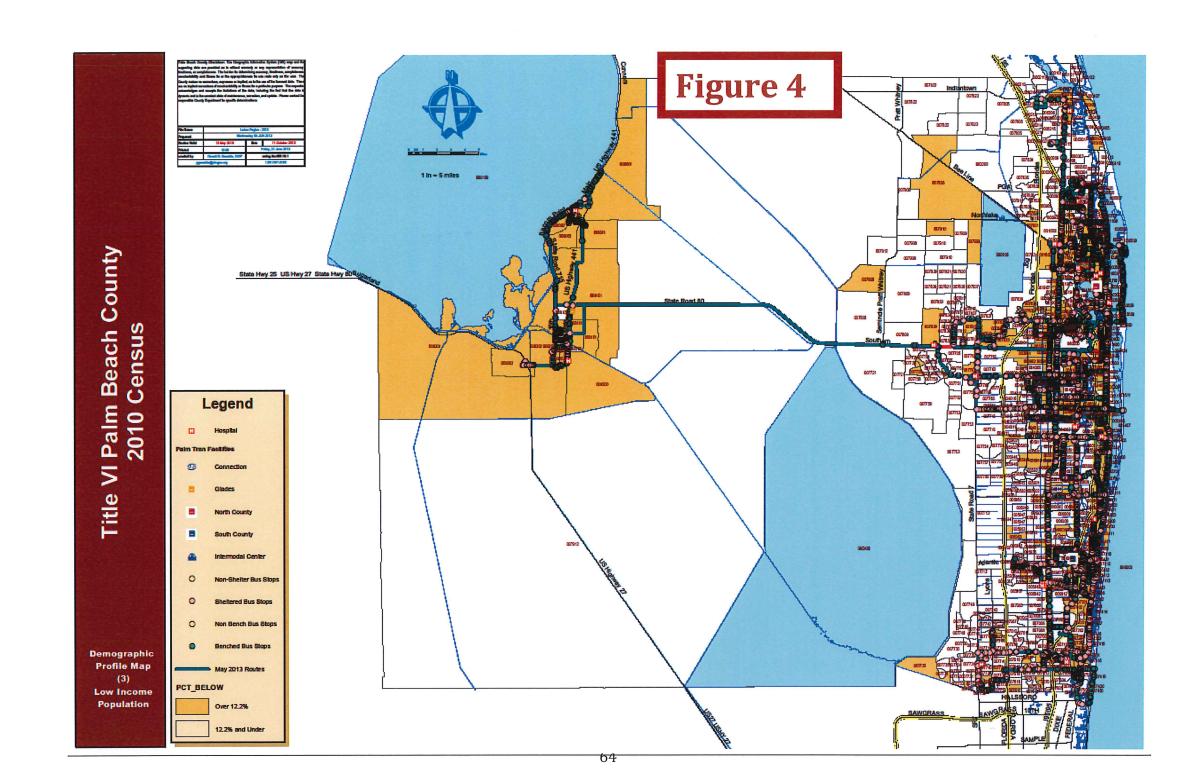
Figure 3 is a demographic map that plots the information listed in Figure 2 above but only shades those Census tracts, where the percentage of the Hispanic population residing in Palm Beach County exceeds the average (19%) percentage of Hispanic population for the service area as a whole.

Figure 4 is a demographic map that plots the information listed in Figure 1 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 (12.2%) percentage of low-income populations for the service area as a whole.









Demographic Ridership and Travel Patterns.

The population of Palm Beach County has increased nearly twice as fast as that of other South Florida counties over the last 10 years but at a similar rate to that of Florida as a whole. 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.

Area	2000	2010	% Change
Palm Beach County	1,131,184	1,320,134	14.3
Broward County	1,623,018	1,748,066	7.2
Miami Dade County	2,253,362	2,496,435	9.7
Florida	15,982,378	18,801,310	15.0

Palm Beach County is home to people of many backgrounds and ethnicities. Per the 2010 Census, nearly 74% of Palm Beach County residents are white, 17% are African-American, 2% are Asian, 0.6% are American Indian or Native Hawaiian, and 4% are identified as another race. Of all county residents, 19% 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, Belle Glade, Pahokee, South Bay and Canal Point.

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 2016 Transportation 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 as 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 has not implemented a Major Service Change or increased the Fare since the last Title VI Update in September 2013; no Service and/or Fare Equity Analysis has been conducted.