

II. FISCAL IMPACT ANALYSIS

A. Five Year Summary of Fiscal Impact:

Fiscal Years	2026	2027	2028	2029	2030
Capital Expenditures					
Operating Costs					
External Revenues					
Program Income(County)					
In-Kind Match(County					
NET FISCAL IMPACT	*				
#ADDITIONAL FTE					
POSITIONS (CUMULATIVE					

Is Item Included in Current Budget? ☐ Yes ☐ No

Does this item include the use of federal funds? ☐ Yes ☐ No

Budget Account No:

Fund Agency Organization Object

B. Recommended Sources of Funds/Summary of Fiscal Impact:

*There is no fiscal impact associated with this item.

C. Departmental Fiscal Review: Barbara Ellis for
Lyne Johnson, Director Administrative Services

III. REVIEW COMMENTS:

A. OFMB Fiscal and/or Contract Dev. and Control Comments:

Lux Mark 9/23/2025
OFMB MAF 9/23

Brandy Brack 9/23/25
Contract Dev. & Control 2679.23-25

B. Legal Sufficiency

For M. Mutambara
Assistant County Attorney 9/25/25

C. Other Department Review

Department Director

(THIS SUMMARY IS NOT TO BE USED AS A BASIS FOR PAYMENT.)

RESOLUTION NO. R – 2025 - _____

RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS (BCC) OF PALM BEACH COUNTY, FLORIDA, APPROVING THE 2026-2028 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 49 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, Palm Beach County through Palm Tran, Inc., a not-for-profit corporation created as an instrumentality of the County, operates and manages the County's public transit system under the oversight of the Board of County Commissioners (BCC) of Palm Beach County; 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, , in accordance with the requirements of Title VI and FTA Title VI Circular 4702.1B, Palm Beach County seeks to ensure meaningful access to transit related 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 BCC; 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 *2026-2028 Title VI Program Update*, dated September 16, 2025;

NOW THEREFORE BE RESOLVED, that the BCC approves the *2026-2028 Title VI Program Update*.

This Resolution shall take effect immediately upon its adoption.

The foregoing Resolution was offered by Commissioner _____, who moved its adoption. The motion was seconded by Commissioner _____, and upon being put to a vote, the vote was as follows:

Commissioner Maria G. Marino, Mayor	_____
Commissioner Sarah Baxter, Vice Mayor	_____
Commissioner Gregg K. Weiss	_____
Commissioner Joel G.Flores	_____
Commissioner Marci Woodward	_____
Commissioner Maria Sachs	_____
Commissioner Bobby Powell, Jr.	_____

The Mayor thereupon declared the resolution duly passed and adopted this _____ day of _____, 2025.

APPROVED AS TO FORM AND
LEGAL SUFFICIENCY

PALM BEACH COUNTY, FLORIDA
BY ITS BOARD OF COMMISSIONERS
Michael A. Caruso, Clerk and Comptroller

By:_____	By: _____
County Attorney	Deputy Clerk



Title VI Program Update

August 2025

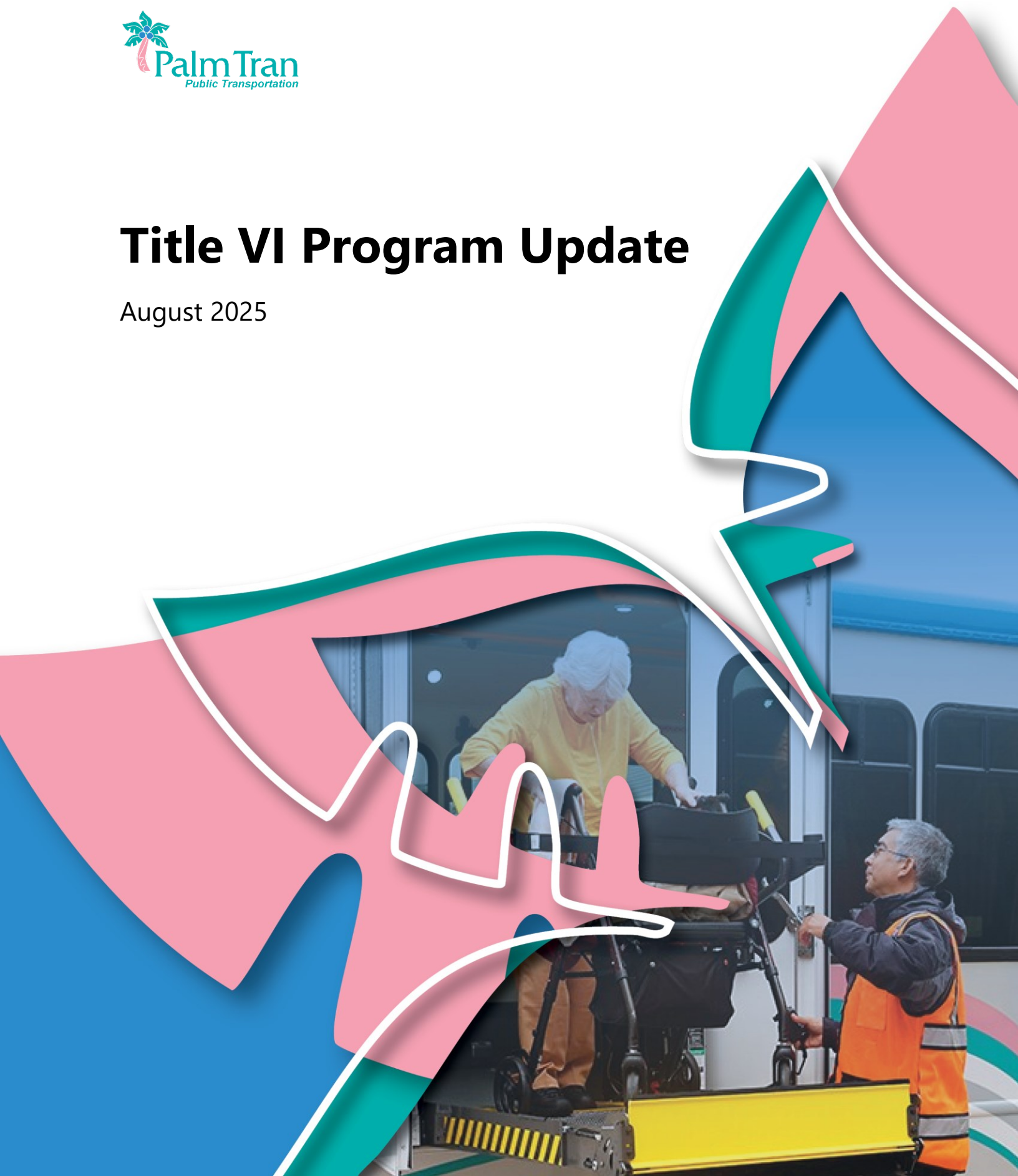


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1 INTRODUCTION

Palm Beach County, as a designated recipient of the Federal Transit Administration (FTA), submits this Title VI Program Update for FY2026-2028 in compliance with Title VI of the Civil Rights Act of 1964, and the implementation guidelines found in FTA Circular 4702.1B, published October 1, 2012.

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

The purpose of the update is to describe how Palm Tran, Palm Beach County's Public Transit System, is complying with Title VI requirements. The intent is to identify both 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 meeting 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"
- Executive Order 12898 of February 1994: Environmental Justice Executive Order
- Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency

The Title VI Program Update incorporates the relevant chapters (Chapters III and IV) from the FTA Circular 4702.1B published on October 1, 2012: Title VI Requirements and Guidelines for Federal Transit Administration Recipients. An updated Title VI Program Update is required every three years, with the next update due in 2028.

2 TITLE VI PROGRAM POLICIES

FTA Circular 4702.1B: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Palm Tran will ensure the following:

1. Palm Tran will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Palm Tran will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, Palm Tran will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If Palm Tran determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Palm Tran may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Palm Tran must demonstrate and document how both tests are met. Palm Tran will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Palm Tran has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, Palm Tran does not have any Title VI Equity Analysis reports to submit with this Plan. Palm Tran will utilize the demographic maps included in this Title VI Program Update for future Title VI analysis. The following sections will describe in detail policies and procedures surrounding service and fares.

2.1 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.

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.

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 Impacts to minority populations and Disproportionate Burdens 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.
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 a 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.

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.

2.2 Procedures

Palm Tran's Title VI Program Procedures are defined as follows:

2.2.1 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 are required to complete an equity analysis that includes an analysis of potential adverse effects to identify whether proposed changes result in an unequal distribution of burdens or benefits.

Exceptions

1. 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.
2. 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.
3. 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.
4. 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).
5. 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.
6. Changes to a "modified" route due to a Major Service change, unless service on that route is eliminated completely

2.2.2 Service Monitoring

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 the 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 and/or the BCC as required.
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.

2.2.3 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 routes to minimize the risk of breakdowns. Vehicle assignments are based on the size of the vehicle (some routes have size restrictions due to turn radius and barrier restrictions) as well as the passenger loads on each particular route. New vehicles replace buses that have met their useful life, and new buses are distributed to locations where replacements are needed.

The Maintenance Department makes daily 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 states that the average vehicle age for minority routes should be similar to that of Palm Tran's overall system. The threshold to determine adverse disparate impact is established at 150% of the overall system average vehicle age.

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

2.2.4 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 (APC), 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/policy provide bus shelters within their boundaries and are encouraged to follow the above guidelines.

Provision of Information

Bus stop signage includes:

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

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

2.3 Equity Analyses

There are two types of equity analyses: A service equity analysis for service changes and a fare equity analysis for fare changes.

2.3.1 Service Equity Analysis

1. Service Equity Analyses for minority populations are completed using the following guidelines:
 - a. Use the major service change policy definition and describe the dataset(s) that will be used in the analysis.
 - b. Describe the techniques and/or technologies used to collect the data
 - c. 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 persons not in the protected class who are adversely affected.
 - d. Compare existing service to proposed changes and calculate the absolute change as well as the percent change.
 - e. 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.
 - f. If a disparate impact is found, alternatives must be reviewed to mitigate the potential impact.
 - g. If a disparate impact is found and the service change is modified, the change must be reanalyzed.
 - h. Service changes that show disparate impact may only be implemented if:
 - i. A substantial legitimate justification exists; and

- ii. There are no alternatives that would have a less disparate impact on minority riders but would still accomplish legitimate program goals.
 - i. I. Brief and obtain approval from the Palm Tran Service Board and the BCC when required.
2. Service Equity Analyses for low-income populations:

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.

Service Equity Analysis for Low-Income Populations is completed using the following guidelines:

- a. Use the major service change policy definition and describe the dataset(s) that will be used in the analysis.
- b. Describe the techniques and/or technologies used to collect the data.
- c. 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 persons not in the protected class who are adversely affected.
- d. Compare existing service to proposed changes and calculate the absolute change as well as the percent change.
- e. 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.
- f. If a disproportionate burden is found, alternatives must be reviewed to mitigate the potential impact.
- g. Brief and obtain approval from the Palm Tran Service Board, and the BCC when required.

2.3.2 Fare Equity Analysis

- 1. Fare Equity Analysis for minority populations is completed using the following guidelines:
 - a. Describe the dataset(s) that will be used in the analysis of all fare changes
 - b. Describe the techniques and/or technologies used to collect the data.
 - c. Determine the number and percent of users of each fare media being changed.
 - d. Review fares before and after the change.
 - e. Compare the differences for each particular fare media between minority users and overall users.
 - f. Evaluate the impacts on minority populations.
 - g. 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.

- h. If a disparate impact is found, alternatives must be reviewed to mitigate the potential impact.
 - i. If a disparate impact is found and the fare change is modified, the change must be reanalyzed.
 - j. Fare changes that show disparate impact may only be implemented if:
 - i. A substantial legitimate justification exists; and
 - ii. There are no alternatives that would have a less disparate impact on minority riders but would still accomplish legitimate program goals.
 - k. Brief and obtain approval from the Board of County Commissioners.
2. Fare Equity Analysis for low-income populations

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.

Fare Equity Analysis for Low-Income Populations is completed using the following guidelines:

- a. Define and describe the dataset(s) that will be used in the analysis of all fare changes.
- b. Describe the techniques and/or technologies used to collect the data.
- c. Determine the number and percent of users of each method of payment, or fare media, being changed.
- d. Review fares before and after the change.
- e. Compare the differences for each particular fare media between low-income users and overall users.
- f. Evaluate the impacts on low-income populations.
- g. 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.
- h. If a disproportionate burden is found, alternatives must be reviewed to mitigate the potential impact.
- i. If a disproportionate burden is found and the fare change is modified, the change must be re-analyzed.
- j. Fare Changes that show disproportionate burdens may only be implemented if:
 - i. A substantial legitimate justification exists; and
 - ii. There are no alternatives that would have a less disproportionate burden on low-income riders but would still accomplish legitimate program goals. Brief and obtain approval from the Board of County Commissioners.

3 TITLE VI/NONDISCRIMINATION POLICY STATEMENT AND MANAGEMENT COMMITMENT TO TITLE VI PLAN

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Palm Tran assures the Florida Department of Transportation and Federal Transit Administration that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Palm Tran further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison who has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses the agency's commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in languages other than English.
3. Insert nondiscrimination clauses into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Palm Tran.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix L of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature

Ivan Maldonado

Executive Director, Palm Tran, Date:

4 DESCRIPTION OF SERVICES

Palm Tran submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Palm Tran is a sub-recipient of FTA funds and provides service in Palm Beach County. A description of the current Palm Tran system is included in section 4.3.

Title VI Liaison

Lina Aragon

Manager of Equal Employment Opportunity

561-812-5351

Laragon@pbc.gov

Palm Tran must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain up-to-date knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FTA or any other regulatory agency.
- Disseminate Title VI information to the public, including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

4.1 Annual Certifications and Assurances

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Palm Tran will remain in compliance with this requirement by annual submission of certifications and assurances as required by FTA.

4.2 Title VI Plan Concurrence and Adoption

This Title VI Plan was submitted to the Palm Beach County Board of County Commissioners on September 16, 2025. The Plan was approved and adopted by the BCC and submitted for FTA concurrence on September 29, 2026. A copy of the Board of County Commissioners resolution is included in Appendix J of this Plan.

4.3 Overview of Palm Tran Service Area

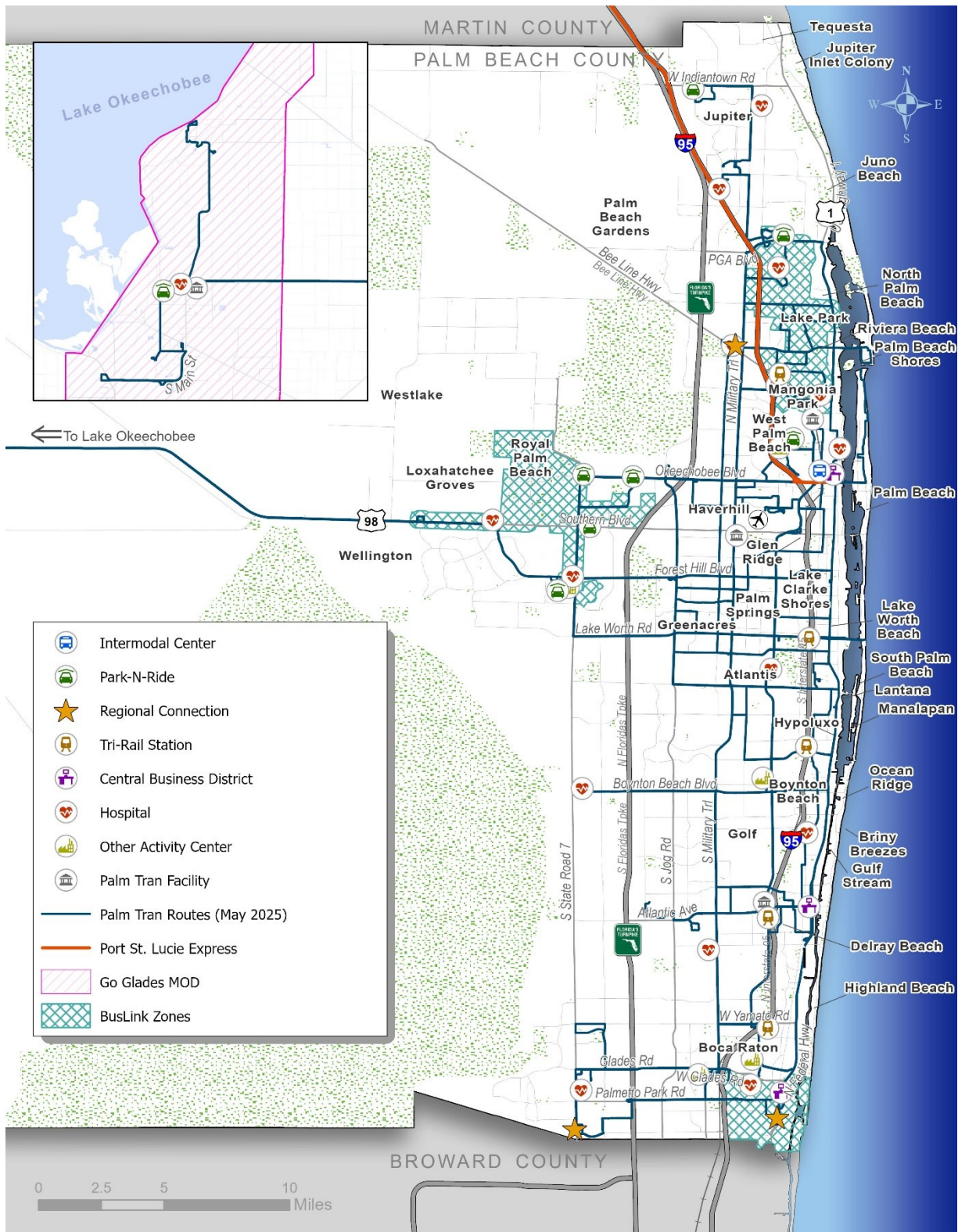
Palm Tran is the primary public transportation provider in Palm Beach County, operating fixed route, paratransit, and on-demand services.

Palm Tran's fixed route network, illustrated in Figure 4-1, includes 29 local routes and one commuter express route (Port St. Lucie Express) that serve 2,726 bus stops and 17 park-and-rides. Its main hub is the West Palm Beach Intermodal Transit Center, where riders can transfer between nine Palm Tran routes and other services, including Tri-Rail, Amtrak, Greyhound, Circuit electric shuttles, and the West Palm Beach Trolley. Other major transfer locations include Mall at Wellington Green, West Palm Beach VA Medical Center, Boca Town Center Mall, and Gardens Mall.

More details on the fixed route bus services are available on Palm Tran's website at:

<https://www.palmtran.org/>

FIGURE 4-1: PALM TRAN FIXED ROUTE SYSTEM



4.3.1 Palm Tran Connection

Palm Tran Connection is a shared-ride, door-to-door paratransit service provided within $\frac{3}{4}$ -mile of a Palm Tran bus route. Connection services are available to persons with disabilities or who are otherwise unable to use the fixed route system, transport themselves, or purchase other transportation and depend on public transportation for employment, medical, and other life-sustaining trips.

To access Connection services, potential users must inquire about eligibility. There are two categories of eligibility: temporary and permanent. Eligibility under temporary designation is attributed to any person with a physical, mental, or psychological disability or incapacity of fewer than six months' duration. The permanent designation is attributed to any person who experiences chronic conditions. Those who wish to access these services may inquire about eligibility and apply by following these instructions:

1. Call the Palm Tran Connection Eligibility Department at 561-649-9838, option 7. Ask to speak with an Eligibility Representative.
2. A four-question assessment will be completed with the applicant or their designated representative.
3. The applicant will then receive an application via USPS 2-3 days after the first call.
4. Complete the application and send it back to Palm Tran Connection. Call to schedule a phone interview with an Eligibility Customer Service representative
5. The completed application will be reviewed by the Palm Tran Connection Eligibility staff.
6. Eligibility will be determined based on the information provided when the phone assessment is conducted.

More details on the service application process are available on Palm Tran's website at:

<https://www.palmtran.org/wp-content/uploads/2021/08/Connection-Brochure-Flat-Sheet-ADACOMP.pdf>

or

<https://www.palmtran.org/wp-content/uploads/2021/10/2021-Palm-Tran-Connection-Rider-v11-YA-9.23.21.pdf>

Three types of services are provided by Connection:

- **Complementary paratransit service** is for persons with disabilities who are unable to use fixed route service due to the inability to access or ride the bus, access bus stops or other transit facilities, or independently navigate the fixed route system. As required under the Americans with Disabilities Act (ADA), Palm Tran must provide complementary paratransit service, also known as ADA service, during the same days and times as fixed-route service is provided. ADA service must be provided within $\frac{3}{4}$ -mile of each fixed route and rail station. To be eligible for this service, individuals must first complete an ADA application.
- **Transportation Disadvantaged (TD) service** is for customers who live more than $\frac{3}{4}$ -mile from a fixed route (i.e., beyond the ADA service area) and who, because of physical or mental disability, income status, or age, are unable to transport themselves or to purchase transportation and have no other means of transportation. The TD Program is sponsored by the State of Florida

Transportation Disadvantaged Trust Fund. The Florida Commission for the Transportation Disadvantaged (CTD), which oversees the TD Trust Fund, has designated Palm Tran as the local Community Transportation Coordinator (CTC). As the CTC, Palm Tran is responsible for coordinating and providing transportation services to eligible TD individuals in the county. Through Connection, TD service is provided anywhere in Palm Beach County during the same hours and days as Palm Tran bus service. To become eligible for TD service, applicants must submit proof of income or a physician-completed medical verification form and their completed application.

- **Division of Senior Services (DOSS) service** is provided to transport adults aged 60 or older to senior centers and meal sites, Monday through Friday.

Connection paratransit service is provided within $\frac{3}{4}$ of a mile of a Palm Tran bus route. Connection accepts appointments for trips up to three days in advance or as late as the day prior to the trip from those who meet the eligibility criteria. Same-day trips are not permitted. Generally, scheduled pick-up times align with operating times for Palm Tran's fixed-route services, as required. Connection also allows for recurring trips to be scheduled, referred to as a subscription trip.

4.3.2 Other Palm Tran Services

Go Glades is an on-demand service operating in Belle Glade, Pahokee, and South Bay. It is a mobility-for-all service (no eligibility required). The service uses a smartphone app, or customers can call the call center to request a ride. In December 2018, this service started as a flex service pilot consisting of four point-deviation routes. In April 2020, the service transitioned to an on-demand service to better respond to the community's needs during the pandemic. In 2021, Palm Tran procured a software-as-a-service (SaaS) application to facilitate ride-hailing, fare payment, and service optimization. This advancement transformed Go Glades into a fully on-demand (real-time) service and established a new service model for Palm Tran when it began using the Via application in live service on February 8, 2022. Go Glades ridership has been reported to average over 10,000 riders per month. Since the last Title VI update, Palm Tran has introduced the following pilot services:

BusLink was introduced by Palm Tran on September 3, 2024 as a pilot. In partnership with Uber and local taxi services, Palm Tran offers an \$8 voucher for an Uber or Taxi ride to or from a Palm Tran bus stop within the designated Bus Link zone. There are currently three zones in operation, serving areas within Boca Raton, Riviera Beach, and Royal Palm Beach. Bus Link was developed as an affordable solution to resolve demand for first-mile and last-mile connections and inefficient fixed-route service in those areas.

Port St. Lucie Express (95X) is an express commuter route served by Palm Tran that connects Port St. Lucie to West Palm Beach along the I-95 corridor. This Florida Department of Transportation (FDOT) funded the pilot service is designed to offer a convenient commuter option between these two cities, with service operating on weekdays and featuring stops such as the SW Gatlin Boulevard Park-and-Ride and the West Palm Beach Intermodal Transit Center. The service prioritizes passenger convenience with facilities for bicycles, baggage, and mobility aids. The PSL Express provides weekday nonstop service between the Gatlin Boulevard Park and Ride in Port St. Lucie and the West Palm Beach Intermodal

Transit Center. Morning trips depart Port St. Lucie starting at 6:20 a.m., with return trips from West Palm Beach in the afternoon. The regular fare is \$3 each way and cannot be paid in cash.

5 TITLE VI NOTICE TO THE PUBLIC

FTA Circular 4702.1B: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

5.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color, and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

Palm Tran's Title VI Notice to Public is as follows:

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, 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, you may contact us:

Call: 877-930-4287 Palm Tran

Attn: Customer Service Administrator

50 S Military Trail suite 101

email: PT-ADA@pbcgov.org West Palm Beach, FL 33415

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.

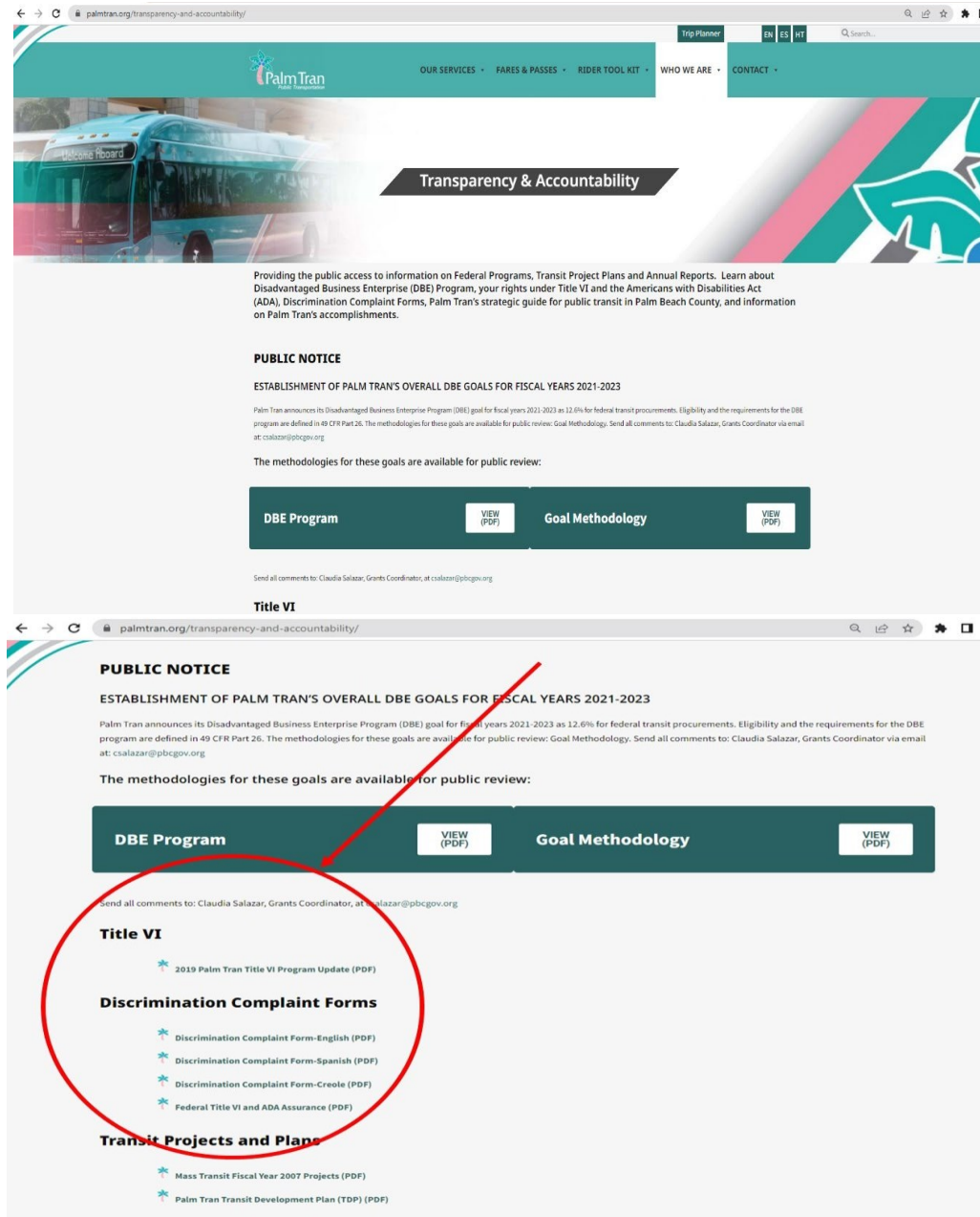
5.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Palm Tran's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Palm Tran's office(s) including the reception desk and meeting rooms, and on Palm Tran's website at palmtran.org. Additionally, Palm Tran will post the notice at stations, stops and on transit vehicles.

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

The notice can be found in Appendix B and on Palm Tran's website as shown below in Figure 5-1, Figure 5-2, and Figure 5-3.

FIGURE 5-1: LOCATIONS OF DISCRIMINATION COMPLAINT FORMS



<https://www.palmtran.org/transparency-and-accountability/>

FIGURE 5-2: VEHICLE POSTING OF THE NON-DISCRIMINATION POLICY

PALM TRAN'S NON-DISCRIMINATION POLICY		
FEDERAL TITLE VI CIVIL RIGHTS ASSURANCE NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT Palm Tran operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. 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 because of an individual's disability in compliance with the Americans with Disabilities Act (ADA). Any person who believes she or he has been subjected to discrimination under Title VI or ADA, may file a Discrimination Complaint Form by contacting: Palm Tran, Attn: Customer Service Administrator 50 South Military Trail, Suite 101 • West Palm Beach, FL 33415 Call: 877-930-4287 • Email: PT-ADA@pbogov.org • www.palmtran.org A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 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.	TÍTULO VI GARANTÍA DE LOS DERECHOS CIVILES LEY PARA PERSONAS CON DISCAPACIDADES Palm Tran opera sus programas y servicios sin que importe su raza, color u origen nacional de acuerdo a el Título VI del Acta de los Derechos Civiles. 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 una discapacidad (Ley ADA). Cualquier persona que crea que ha sido sometida a discriminación bajo el Título VI o ADA, puede comenzar el proceso de queja comunicándose con: Palm Tran, Attn: Customer Service Administrator 50 South Military Trail, Suite 101 • West Palm Beach, FL 33415 Llamar: 877-930-4287 • Email: PT-ADA@pbogov.org • www.palmtran.org Una persona con una quejilla puede presentarla directamente con la Administración Federal de Transporte sometiendo una queja a: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 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 actúe ninguna acción que cambie fundamentalmente la naturaleza de sus programas o servicios, o que imponga un costo administrativo o financiero excesivo. Cuando sea posible, las 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.	TIT FEDERAL VI ASIRANS DWA SIVIL ANBA AMERIKEN YO AK LWA ANDIKAP Palm Tran opere pwogram li yo ak sevis yo san yo pa konsidere nan ras, koule, ak orijin nasyonal nan ako avek Tit VI nan lwa sou dwa sivil yo. Palm Tran angaje pou asire ke pa gen moun ki eskli nan patisipasyon nan, oswa refize benefis sevis li yo, oswa pou yo kapab sibi diskriminasyon akòz andikap yon moun nan konfòmite Ameriken ak lwa andikap (ADA). Nenpòt moun ki kwe li te sibi diskriminasyon anba Tit VI oswa ADA, kapab depoze yon fom plent diskriminasyon pa kontakte: Palm Tran, Attn: Customer Service Administrator 50 South Military Trail, Suite 101 • West Palm Beach, FL 33415 Rele: 877-930-4287 • Imel: PT-ADA@pbogov.org • www.palmtran.org Yon plentif kapab depoze yon plent dirèkteman avek administrasyon transpo federal la le ou ap depoze yon plent avek biwo dwa sivil la, atansyon: Koodonate pou pwogram VI a, nan les bilding, 5th etaj-TCR, 1200 New Jersey ave., SE, Washington, ak DC 20590 Modifikasyon pou politik ak pwosed: Palm Tran pral fe chanjman rezonab nan politik ak pwogram yo asire ke moun ki gen andikap gen yon opòtinite egal yo jwi lout pwogram li yo, sevis ak aktivite. ADA a pa mande pou Palm Tran pran nenpòt ki aksyon ki la fondamantalman chanje nati a nan pwogram li yo oswa sevis yo, oswa enpoze nenpòt ki soufwans finansye oswa responsabite administratif. Chak fwa posib, demann pou modifikasyon ta dwe fet davans. Demann ki soti nan men moun ki gen yon andikap yo ta dwe kom espesifik ke posib epi ki gen ladan yo enfòmasyon sou Poukisa modifikasyon yo bezwen yo nan lòd yo pemet moun nan sevi ak sevis tran Palm.

This format is used for display in all the buses.

FIGURE 5-3: NON-DISCRIMINATION POLICY IN PALM TRAN'S RIDER GUIDE

Palm Tran's Non-Discrimination Policy

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

Palm Tran operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. 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 because of an individual's disability in compliance with the Americans with Disabilities Act (ADA).

Any person who believes she or he has been subjected to discrimination under Title VI or ADA may file a Discrimination Complaint Form by contacting:

Palm Tran, Attn: Customer Service Administrator
50 South Military Trail, Suite 101
West Palm Beach, FL 33415

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

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE, Washington, DC 20590

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.

This policy is available in English, Spanish, and Creole in Appendix B of this plan. The Non-Discrimination Policy can also be found in Palm Tran's Rider Guide.

6 TITLE VI COMPLAINTS AND CONTRACT COMPLIANCE

FTA Circular 4702.1B: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public.

6.1 Complaint Procedure

Palm Tran's Title VI complaint policy and procedure is as follows:

6.1.1 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 Palm Tran's Customer Service Center or by mailing in a Discrimination Complaint Form.

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

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

1. It shall be the responsibility of the Customer Service Supervisor to classify Title VI customer complaints as 'priority' and forward them to the Customer Service Administrator and Operations Director for processing and investigation.
2. It shall be the responsibility of the Customer Service Administrator to coordinate all correspondence with the CP, including, but not limited to the Notification of Investigation and Closure Letter if no finding is made. The Customer Service Administrator shall also be responsible for coordinating delivery of the Title VI Complaint form if it has not already been obtained by the CP.
 - a. The Notification of Investigation will be sent within five (5) business days of Palm Tran's receipt of the complaint from the CP, acknowledging receipt of the complaint and confirming that the complaint will be investigated.

- b. Investigations will typically be completed within ten (10) business days of Palm Tran's receipt of a validated complaint from the CP. A determination of the course of action, if any, should be completed within thirty (30) business days.
 - c. The Closure Letter will be sent to the Complaining Party within five (5) business days of the close-out or completion of the investigation.
 - d. Requests for time extensions to complete an investigation or reach a determination will be directed to the Customer Service Administrator and granted as needed.
3. It shall be the responsibility of the Customer Service Administrator and Operations Director to coordinate all aspects of the investigation, including but not limited to interviews with staff members and review of audio/video or other evidence.
4. It shall be the responsibility of the Equal Employment Opportunity (EEO) Officer to coordinate delivery of a Letter of Finding (LOF) to the CP when discrimination complaints are substantiated. The LOF will be sent to the CP within five (5) business days of the completion of the investigation.

6.1.2 Tracking Fixed Route Title VI Complaints

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

1. It shall be the responsibility of the Customer Service Administrator to track Title VI complaints in their system. Quarterly reports shall be sent to the Director of Support Services for reconciliation.
2. It shall be the responsibility of the Customer Service Administrator to track Title VI investigations and lawsuits. The list shall include the date the investigation commenced, or lawsuit was filed, a summary of the allegation and the status of the investigation or lawsuit. This list shall be included in the Title VI Program Update submitted to FTA every three (3) years.

6.1.3 Public Access to Fixed Route Title VI Procedures

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

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

6.2 Notice to Public for Filing Complaints

The notice to the public for complaint procedure reads:

Any person who believes she or he has been subjected to discrimination under Title VI or ADA, may file a Discrimination Complaint Form by contacting:

Palm Tran, Attn: Customer Service Administrator

50 South Military Trail, Suite 101 • West Palm Beach, FL 33415 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.

6.3 Complaint Form

The complaint form is 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 Palm Tran's website at: <http://www.palmtran.org>

The form is available in English, Spanish, and Creole and can be found in Appendix D

6.4 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Palm Tran will submit Title VI Plans to FTA for concurrence on an annual basis or any time a major change in the Plan occurs. The

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

6.5 Sub-recipient Assistance and Monitoring

FTA Circular 4702.1B, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

Palm Tran does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, Palm Tran utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if Palm Tran has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

6.6 Contractors and Subcontractors

Palm Tran is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Palm Tran, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

6.6.1 Nondiscrimination Clauses

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in the Code of Federal Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Federal Transit Administration as appropriate and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Palm Tran shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as Palm Tran may direct as a means of enforcing such provisions including sanctions for noncompliance.

7 TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

FTA Circular 4702.1B: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Palm Tran must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Palm Tran in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to FTA.

From January 2022 through June 2025, Palm Tran did not have any Title VI-related lawsuits. During this timeframe, only 29 out of 8,519 total customer service complaints received were perceived as possible Title VI related issues, however, these were more related to operators' customer service.

7.1.1 2022

Palm Tran received 15 Title VI complaints in 2022, all of them related to perceived discriminatory behavior from bus operators. Of these complaints, eight were deemed "Not Valid," two were deemed "Valid," and five were "Documented." None of these were considered violations. Of the two "Valid" complaints, video documentation was unavailable to verify the complaints.

7.1.2 2023

Palm Tran logged 8 Title VI complaints in 2023. Investigations ruled five "Not Valid" and three "Documented" having insufficient evidence. No violations were confirmed. The bulk of reports again concerned perceived discriminatory driver behavior, this time clustering on Routes 62 and 1. Each incident underwent video review and customer follow-up; investigators found no evidence of widespread discrimination.

7.1.3 2025 (Jan – Jun)

In the first half of 2025, six complaints were filed. Results shifted slightly: one complaint was ruled "Valid," four "Documented," and one "Not Valid." The upheld case involved a Route 3 operator; corrective action and passenger notification followed. The remaining complaints, mostly on Route 3 and Route 2, were either unsubstantiated or lacked enough detail. Overall volume is trending lower year-to-date, with no emerging systemic issues.

8 PUBLIC PARTICIPATION PLAN

FTA Circular 4702.1B: Every Title VI Program shall include a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Palm Tran was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Palm Tran 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.

The Palm Tran Service Board (PTSB) is authorized to hold public hearings. After considering public comment and any service equity analysis performed, PTSB has the authority to approve Palm Tran fixed route service changes constituting 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. The PTSB is also authorized to approve changes to Palm Tran fixed routes that do not constitute major service changes after holding a public meeting and considering public comment. The PTSB does not have the authority to approve any service changes, including major service changes, for which there will be an increase in the cost of services. In all other respects, the PTSB is an advisory body to the Palm Beach Board of County Commissioners (BCC). The PTSB Paratransit Subcommittee and PTSB Planning Subcommittee are solely advisory bodies to the PTSB, which were established to assist the PTSB in the performance of its duties.

Notwithstanding anything contained in this Program Update, the BCC has the authority to conduct public hearings, consider public comments, review and approve service and fare equity analysis (for both minority and low-income populations), and make final decisions regarding fare and service changes. The BCC also has the authority to hold public meetings and consider public comments regarding service changes that are not major service changes, as it deems appropriate. A "formal" public hearing does not need to be held for service changes that do not constitute a major service change. The PTSB makes recommendations and provides advice when requested by the BCC, the Palm Beach County Administrator, or the Palm Tran Executive Director. While the PTSB makes recommendations and provides advice when requested, the authority to approve Palm Tran policies and procedures is vested in the BCC, excluding matters vested in the County Administrator or the Palm Tran Executive Director.

Sound policy and service delivery decisions must consider 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, fare media, or fares.

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

8.1 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. The principles are as follows:

- Be early and continuous.
- Provide 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, making every effort 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.

The PPP strives 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.

8.2 Methods For Achieving Public Participation

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 provided by publications 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.

While developing the Transportation Development Plan (TDP), Palm Tran conducts 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 to provide feedback via Palm Tran's social media platforms 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 achieve specific public participation goals that vary by project or by 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, customized for the specific audience is created to achieve the stated goals while 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.

8.2.1 Providing Notice to the Public

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

- In-bus advertisements
- Postings and information on Palm Tran's Website
- PTSB - Planning Subcommittee
- Notices on major media outlets
- Flyers and Information distribution through various libraries, universities, and civic organizations that currently help distribute timetables and information
- Postings on the County website
- Palm Tran Connection Office Lobby

All major printed materials and website information that communicate proposed and actual service adjustments will be provided in three languages. 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-most predominant non-English language of Palm Tran riders.

The PPP strives to offer meaningful opportunities for all interested populations, 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, fare media, services and routes of the Palm Tran system.

8.3 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
2. When a change in fare media for Palm Tran services is proposed
3. When a major service change is proposed
4. When the Title VI Program Policies or Service Standards are updated or modified.

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. The notice shall be advertised using a variety of the methods provided above including, at a minimum, on Palm Tran's website and in newspapers with countywide distribution including Spanish and Creole language publications. Should no creole publications exist, Palm Tran will advertise on a Creole radio broadcasting station (if available) and will post the notice on the station's website.
2. **Location of public hearing:** 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 comments 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 established and announced by Palm Tran in advance of each hearing. Comments provided by the public at the hearing will be recorded. The public will have the opportunity to comment via phone, email, or letter, as well as at the hearing.
4. **Consideration of public comments:** Comments received prior to the final public hearing will be consolidated and summarized by staff and presented to the Board (i.e., the Board of County Commissioners or the Palm Tran Service Board) along with staff recommendations, in writing or other form appropriate under the circumstances prior to final action. Following the conclusion of the final public hearing (i.e., the last opportunity afforded to the public to engage in the decision-making process and provide comments), the Board will give due consideration to the information and recommendations received from staff and the relevant comments and supporting information received from the public, attaching the weight and value it deems proper to such comments, information and recommendations. In doing so, it will take into account the knowledge and expertise of the commenter, to the extent it has information regarding such, supporting facts, research and data received, expert opinions provided, and the reasons provided from those in support of or in opposition to the proposed action. The Board's determination may not be based simply upon the number of comments in support of or in opposition to the proposed action but rather whether its decision will reasonably further a desired outcome or policy objective. The Board may consider alternatives to the proposed action or no action at all, as it deems appropriate.

8.4 Current Outreach Efforts

Palm Tran is required to submit a summary of public outreach efforts made over the last three years.

Since the 2022 Title VI Update, Palm Tran has continued to engage the public in accordance with procedures outlined in the PPP. In addition to the general outreach promoting Palm Tran as a whole, the agency conducted outreach specific for service changes including the introduction of BusLink and the Port St. Lucie Express.

When a new service change occurs—minor service changes occur every four months—Palm Tran conducts a range and outreach activities depending on the extent of the service improvements. For all service changes, Palm usually creates social media posts, sends out emails, updates its website, and updates graphics on the buses’ infotainment screens. For more drastic service changes, Palm Tran might add informative signage at its bus stops and facilities, send out text messages, engage with passengers in-person at its bus stops and facilities, or advertise via radio, television, billboards, and print.

Some of Palm Tran’s outreach materials and summaries are included in Appendix D.

8.4.1 Events

Table 8-1 below lists all in-person outreach events conducted over the past three years. Palm Tran engages with the community through pop-up events, by piggybacking off of other community events, through travel training, and by engaging with Palm Tran passengers to promote upcoming service changes.

TABLE 8-1: PALM TRAN OUTREACH EVENTS

Date	Activity	Location
May 2022	Travel training at Lake Shore Middle School	Belle Glade
June 2022	Juneteenth parade	Riviera Beach
July 2022	Second Chance	Riviera Beach
August 2022	Train-the-Trainer travel training	Greenacres
August 2022	Promoting Palm Tran at the Glades Family Fest	Belle Glade
September 2022	The Arc Community Fun Day	Riviera Beach
October 2022	Greenacres Branch Library Presentation	Greenacres
October 2022	Mobility Week Green Market outreach	West Palm Beach
November 2022	Community Services Expo & Health Fair	Boca Raton
January 2023	Travel training at Greenacres Library	Greenacres
February 2023	Get to Know Palm Beach County Expo	Delray Beach
February 2023	Veterans Health Fair	Delray Beach
February 2023	Senior Health Fair and Community Health Expo	Boca Raton
April 2023	Vehicle Career Day	Belle Glade
September 2023	Hispanic Heritage Month Celebration Tour	Palm Beach County
September 2023	Pop-Up event at Palm Beach State College	Lake Worth Beach
October 2023	Latin Quarter event at Belvedere Elementary School	West Palm Beach

October 2023	Hispanic Heritage Month celebration at Palm Beach State College	Palm Beach Gardens
January 2024	Pop-Up event at Palm Beach Gardens Library	Palm Beach Gardens
February 2024	Touch a Truck event	Palm Springs
February 2024	Caregiving Fair	West Palm Beach
March 2024 – May 2024	14 Move & Mingle events for the Get on the Bus Challenge	Palm Beach County
April 2024 – May 2024	Career Day events at elementary schools	Belle Glade, Boynton Beach, Lake Worth Beach, West Palm Beach
May 2024	Pop-Up event at Keiser University	West Palm Beach
June 2024	Community Resource Expo	Lake Worth Beach
September 2024	Multiple BusLink outreach events	Riviera Beach, Royal Palm Beach, Boca Raton

8.4.2 Public Hearings

When requires for service changes, fare changes, and funding decisions, Palm Tran holds public meetings for these initiatives. Notices of public meetings are posted at least 10 days in advance. Members of the public are able to directly contact the Title VI liaison to request information in a language other than English or to request assistance for individuals with disabilities. Table 8-2 below lists all of Palm Tran’s public meetings in the past three years.

TABLE 8-2: PALM TRAN PUBLIC HEARINGS

Date	Activity
February 2022	5310 funding
March 2022	5307, 5311, and 5339 funding
September 2022	Title VI Program Update
January 2023	5310 funding
June 2023	5307 funding
July 2023	5307 and 5339 funding
August 2023	5307 and 5339 funding
January 2024	5310 funding
August 2024	Establishment of fare for the Port St. Lucie Express
September 2024	5307 and 5339 funding
March 2025	5310 funding
April 2025	Redefining Palm Tran Connection services and fare increase

9 LANGUAGE ASSISTANCE PLAN

FTA Circular 4702.1B: Every Title VI Program shall include a copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

9.1 Introduction

In providing fixed-route service within a service area of almost 1.5 million 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 a 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.

9.1.1 Limited English Proficiency (LEP) Plan Overview

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 110,123 residents or 7.68% that claim to speak English "not well" or "not at all," according to the 2023 American Community Survey. Palm Beach County is federally mandated, by 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 referred to as the "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. 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 issued on August 11, 2000, states that recipients of federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Additionally, recipients should use the US 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. These provisions are included in FTA Circular C 4702.1B.

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 welcomes any comments or suggestions that would further improve the effectiveness of the LEP Plan and/or its ability to communicate more effectively with its customers.

9.2 Four Factor Analysis

In order to ensure meaningful access to programs and activities, the information obtained in the Four Factor Analysis determines the specific language services that are appropriate to provide. The analysis helps Palm Tran determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

9.2.1 The Number/Proportion of LEP Persons Eligible to be Served

The first step towards understanding the profile of individuals that comprise Palm Tran's service area in Palm Beach County is a review of 2023 American Community Survey Data.

Table 9-1 below displays the primary language and number of individuals 5 years and over that speak English "not well" or "not very well" at home. The vast majority of the LEP population speaks Spanish, comprising over five percent of Palm Beach County's total population.

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

TABLE 9-1: PALM BEACH COUNTY LEP POPULATION

Language	LEP Population	Percent of Total Population 5 Years and Older
Spanish	76,388	5.33%
Other Indo-European languages	27,847	1.94%
Asian and Pacific Island languages	4,213	0.29%
Other languages	1,675	0.12%

9.2.2 The Frequency with which LEP Persons Come into Contact with the Program

The growing size of the LEP population in Palm Beach County increases the probability of 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 needs of LEP individuals since October 2005. Since 2005, Palm Tran has not had any requests for interpreters for public meetings. Prior to 2005, Palm Tran had included a Spanish translation of the informative facts provided in the Rider Guide and now includes a Creole translation. Since 2005, there has been no request for translated Palm Tran documents.

9.2.3 The Nature and Importance of the Program to People's Lives

Palm Tran bears in mind that transportation is considered an essential service for its service area population. Palm Tran must consider that the LEP population might be less likely to be able to drive, to have access to a personal vehicle, or to have a driver's licenses. Furthermore, in some cases, it may be absolutely critical, without the bus services or current transit mode they are using, the LEP population may not have access to basic employment or the necessities of life.

9.2.4 The Resources Available to the Recipient for LEP Outreach and the Associated Costs

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 and translations are executed by Palm Tran's staff. The call center provides an option to select Spanish and Creole from the menu. Front desk staff have the option to contact a staff member should an LEP individual require assistance at the front desk. Additionally, both the general customer service personnel and the Palm Tran Connection reservation staff has representatives who are fluent in Spanish and in Creole. Of the 10 general customer service personnel, two are fluent in Spanish and two are fluent in Creole. Not all communications are translated; Palm Tran has targeted vital documents that will allow LEP individuals full participation in the benefits provided by the public transportation system.

9.3 Palm Tran Limited English Proficiency Plan

Palm Tran is committed to providing meaningful access to its services to LEP persons. 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 will provide the following language assistance measures: notice to LEP persons, the translation of vital materials, as well as through oral language interpretation when necessary and possible, and staff training.

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

9.3.1 Providing Notice to LEP Persons

Based on Palm Tran self-assessment of LEP persons that use 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.

Example 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.

9.3.2 Translation of Written Materials

Palm Tran currently provides vital publications, such as the Rider's Guide, with translations in Spanish and Creole. The continued self-assessment of LEP population will determine if additional languages need to be added.

9.3.3 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 leadership will be included in this training, even if they do not interact regularly with LEP persons, to ensure that they are fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff. Training of management staff will also include flexibility in allowing those employees who are fluent in other languages to assist the customer service staff when they encounter a customer who is LEP.

10 TRANSIT PLANNING AND ADVISORY BODIES

FTA Circular 4702.1B: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

The Palm Tran Service Board (PTSB) includes 13 members total (all are PBC residents and appointed by the Board of County Commissioners): two transportation representatives, an environmental advocate, a disability advocate, a businessperson, 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.

Palm Tran recruits PTSB members through advertisements on Palm Tran’s websites, buses, and email outreach. To support greater diversity and participation on the Palm Tran Service Board (PTSB), Palm Tran can take a proactive approach by regularly providing County Commissioners with the current composition of the board. This helps highlight representation gaps and guide more inclusive nominations. In addition, timely notifications—along with consistent follow-ups—on upcoming vacancies will give commissioners ample time to identify and appoint qualified, diverse candidates.

Palm Tran can also increase public engagement by promoting board vacancies and meeting information through multiple channels, including its website, onboard vehicle screens, mobile applications, and social media platforms. These efforts ensure passengers and community members are informed and encouraged to participate, especially individuals from underrepresented groups.

This participation will play a key role in making sure that Palm Tran’s services accurately reflect the needs, priorities, and experiences of the entire community. See Table 10-1.

In addition to these efforts, Palm Tran continues to stay engaged with community-based organizations (CBOs), including nonprofits, and cultural centers. These trusted partners can help share information about board openings and encourage community members to get involved.

TABLE 10-1: PALM TRAN SERVICE BOARD MINORITY REPRESENTATION COMPARED TO PALM BEACH COUNTY

	White	Hispanic/ Latino	Black/ African American	Asian	American Indian / Native Hawaiian	Other Race/ Two or More Races
Palm Beach County Population	52.3%	23.4%	17.1%	2.9%	0.1%	4.1%
Palm Tran Service Board	38.5%	38.5%	7.7%	7.7%	0%	7.7%

11 SYSTEM-WIDE SERVICE STANDARDS AND SERVICE POLICIES

FTA Circular 4702.1B: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Program. These standards and policies must address how service is distributed across the transit system and must ensure that the manner of the distribution affords users access to these assets. Although Palm Tran provides paratransit and on-demand services, the FTA does not require the preparation and submittal of service standards and service policies for services other than fixed route, which is consistent with FTA guidance.

Palm Tran has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

11.1 Service Standards

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

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.

Palm Tran's service standards for vehicle load, vehicle headway, on-time performance, and service availability are listed below in Table 11-1.

TABLE 11-1: PALM TRAN SERVICE STANDARDS

Characteristic	Service Standard
Vehicle Load	Maximum vehicle load ratio: 1.5
Vehicle Headway	Peak weekday service on trunk routes: 30 minutes
	Peak weekday service on crosstown and circulator routes: 60 minutes
	Off-peak weekday service and weekend service on all routes: 60 minutes
On-time Performance	78% on-time (0 to 5 minutes late)
Service Availability	Fixed route transit available within $\frac{1}{4}$ of a mile of 80% of the service area population

11.2 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 nonminority 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. The FTA Circular defines minority persons as including American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian or Other Pacific Islander. Based on 2020 Decennial Census data, 47.74% of Palm Beach County residents are considered part of a minority.

11.2.1 Minority Transit Route Identification

Per Title VI regulations, a Palm Tran minority transit route is identified as having at least one third of its revenue miles in a Census block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area (47.74%) and is supplemented by ridership data that does not reflect the characteristics of the Census block groups. In this case, Palm Tran's 2024 on-board survey serves as the supplemental data. See Appendix E for on-board survey results of each Palm Tran route.

In order to identify the percentage of revenue miles in Census block groups with a greater than 47.74% minority population, a GIS analysis was conducted. First, a feature layer was created that consisted of a single polygon of all Census block groups in Palm Beach County with a minority population greater than or equal to 47.74% of the total block group population. Using this polygon feature layer and the line feature layer of Palm Tran's fixed route, the tabulate intersection tool was executed. This tool calculated the percentage of each line feature intersected by the polygon feature. These percentages equal the percentage of mileage in minority block groups.

To supplement these percentages of mileage in minority block groups, the percentage of the 2024 on-board survey respondents for each route that identify as minority was tabulated. For the purpose of minority transit route identification, routes that have a percentage of surveys greater than 47.74% identifying as minority are considered minority. Finally, a route which has one third of its revenue mileage in block groups with a minority population greater than 47.74% or has 47.74% or more of its 2024 survey respondents identifying as minority is considered a minority transit route. A route where neither of these conditions applies is considered a nonminority transit route.

11.2.2 Minority Transit Route Analysis

Based on the minority transit route identification, 31 of Palm Tran's 33 routes operated between 2022 and 2024 are classified as minority transit routes, as shown below in Figure 11-1 and Table 11-2. Figure 11-1 shows the approximate location of these routes while Table 11-2 outlines the route number, location, and the percentage of revenue miles within classified block groups, breaking at above 33% to be classified as a minority route. Route 88 and Route 95 (Port St. Lucie Express) are the only nonminority transit routes in Palm Tran's fixed route system.

FIGURE 11-1: PALM TRAN MINORITY TRANSIT ROUTES

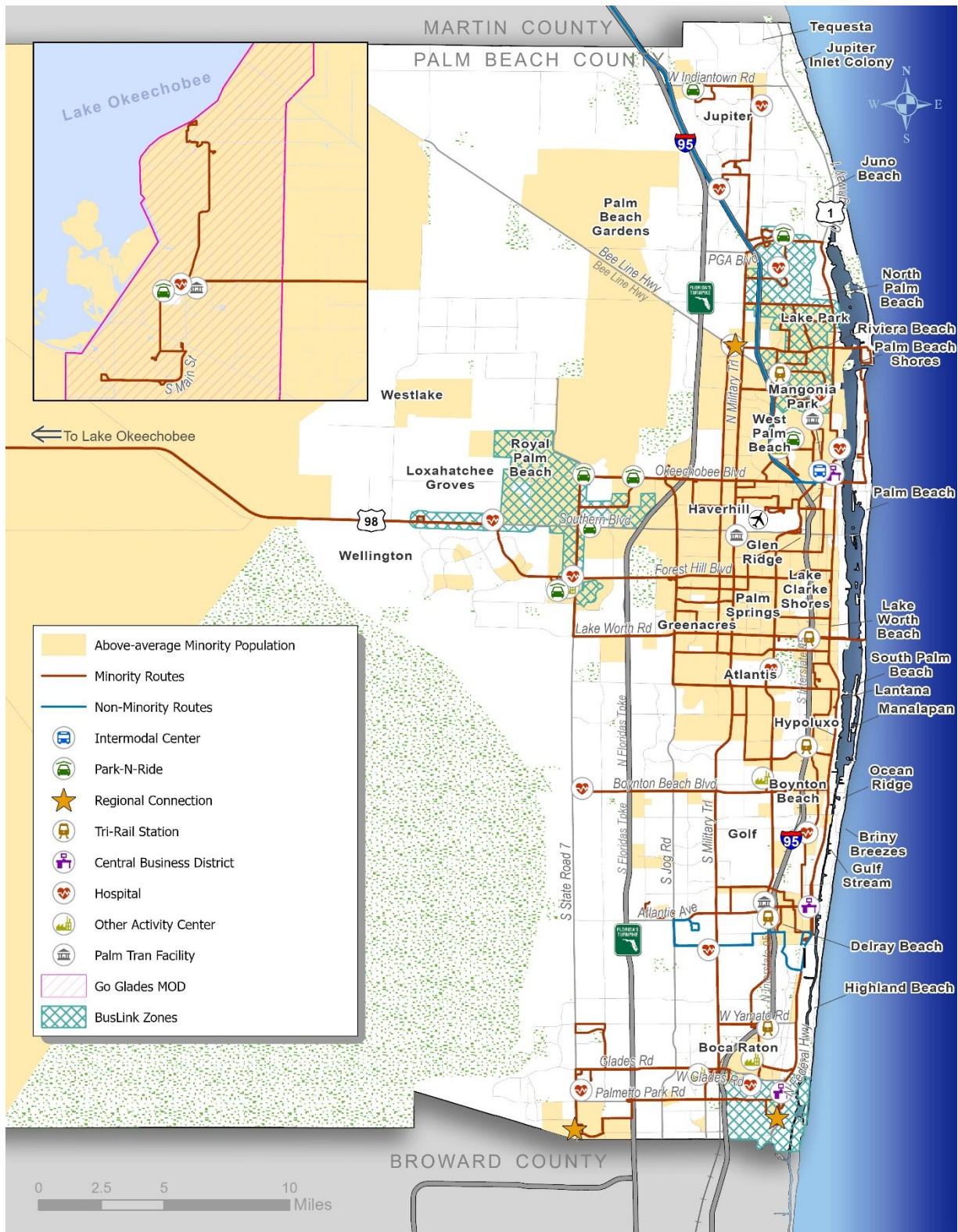


TABLE 11-2: PALM TRAN MINORITY TRANSIT ROUTES

Route	Percent of Mileage in Minority Block Groups	Percent Minority Survey Respondents	Minority Route Status
1 PBG - BCR via US-1	40.16%	70.38%	Minority
2 WPB - BCR via CONGRESS	38.16%	75.30%	Minority
3 PBG - BCR via MILITARY	52.13%	73.47%	Minority
4 WPB - GRN via HAVERHILL	93.99%	92.86%	Minority
10 N COUNTY X-TOWN via MILITARY	5.15%	90.00%	Minority
20 Pbg - Wpb Via Congress	80.90%	70.00%	Minority
21 PBG - MAGNONIA PARK TRS	65.21%	100.00%	Minority
30 RVB X-TOWN via BLUE HERON	53.05%	57.14%	Minority
31 WPB X-TOWN via 45TH	90.13%	77.55%	Minority
33 PBG -WPB via AUSTRALN / PBL	72.31%	86.67%	Minority
40 WPB - BLG via SR-80	70.78%	92.31%	Minority
41 Wpb - Palm Bch Inlet	9.22%	100.00%	Minority
43 WPB X-TOWN via OKEECHOBEE	78.70%	86.29%	Minority
44 WPB X-TOWN via BELVEDERE	71.58%	66.67%	Minority
46 WPB - WLN via FOREST HILL	79.33%	69.05%	Minority
47 PAHOKEE-S BAY via BELLE GLADE	93.97%	89.66%	Minority
49 WPB - EXEC CTR VIA PBL	69.69%	N/A	Minority
52 RPB X-TOWN	49.74%	50.00%	Minority
60 GRN - WPB via PURDY / PARKER	88.91%	94.74%	Minority
61 GRN - LKW via CRESTHAVEN / 10TH AVE N	85.91%	64.52%	Minority
62 WLN - LKW via LAKE WORTH	55.21%	78.79%	Minority
63 VISTA CTR-US1 via JOG / LANTANA	81.27%	81.48%	Minority
64 GRN - LNT via MELALEUCA / 6TH AVE S	86.84%	69.23%	Minority
70 LNT - DLB via SEACREST	67.49%	93.33%	Minority
71 BYB X-TOWN via LAWRENCE	64.83%	100.00%	Minority
73 BYB X-TOWN via BOYNTON BEACH	21.72%	87.50%	Minority
80 DLB X-TWN via LAKE IDA	65.36%	100.00%	Minority
81 DLB X-TWN via ATLANTIC	15.64%	89.47%	Minority
88 DLB X-TWN via LINTON	17.16%	46.15%	Non-Minority
91 BCR X-TOWN via GLADES	15.97%	84.21%	Minority
92 BCR X-TOWN via PALMETTO PARK	25.05%	67.57%	Minority
94 Boca Raton-Trs Via Fau	33.86%	70.38%	Minority
95 Port St Lucie Express	16.44%	N/A	Non-Minority

11.2.3 On-Time Performance

On-time performance refers to the number of runs completed on time. Routes are monitored using the Automatic Vehicle Locator (AVL) data to identify routes that need improvement. On time is defined as arriving at a route time-point from zero minutes early up to five minutes late. No early departures are allowed.

The Palm Tran goal for on-time performance is 78 percent. With the public outreach effort conducted during the Route Performance Maximization (RPM), this standard was modified in September 2018.

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

As shown in Table 11-3 below, system-wide average on-time performance for this reporting period is 76.99%, which is slightly below the 78% goal. Minority routes also do not meet this goal, performing about equal to the system-wide average at 76.95% on-time. At 0.04% below the system-wide average performance, on-time performance for Minority routes is well below the 10% threshold for disparate impact. Nonminority routes' on-time performance is 1.39% above that for system-wide routes, at 78.38% on-time average performance.

TABLE 11-3: AVERAGE ON-TIME PERFORMANCE (JANUARY 2022 – JUNE 2025)

	Average On-Time Performance
System-wide	76.99%
Minority	76.95%
Nonminority	78.38%

Fifteen current routes and two former routes had on-time performance below the 78% goal: Routes 1, 4, 10, 20, 21, 33, 40, 41, 44, 46, 49, 60, 61, 62, 63, 64, 71, and 73. These are all minority routes. Route 63 had the lowest average on-time performance at 63.67%.

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

11.2.4 Headways

Vehicle headway is a measurement of the time interval or frequency between two vehicles traveling in the same direction on the same route. Frequency of service is expressed as an increment of time separating vehicles traveling in the same direction on the same route for peak and off-peak service. Routes with the most frequent service generally have the highest levels of service in terms of the number of vehicles assigned and the total number of daily revenue hours.

Comparisons of headways between routes must take into consideration the characteristics of the routes as summarized below:

- **Trunk Routes:** collect and distribute ridership along developed corridors connecting the urban core. This service is characterized by frequent stops, and relatively slow average bus speed.

- **Cross-town Routes:** are mainly used to link trunk routes serving the urban core, though many cross-town routes also serve high-density corridors with internal travel markets.
- **Circulator Routes:** are routes that circulate and provide services within a city or community.
- **Express Routes:** primarily connecting outlying areas with a central city. Characterized by a motor coach (aka over-the-road bus), peak hour service geared toward commuters, multiple stops in outlying areas, limited stops in the central city, and at least five miles of closed-door service.

Peak period weekday schedules target a minimum of 30-minute headways on trunk routes and 60-minute headways on cross-town and circulator routes. Off-peak weekday and weekend schedules target a minimum of 60-minute headways. This standard was updated when Palm Tran implemented major service changes on September 30, 2018, entitled the Route Performance Maximization (RPM). However, due to the COVID-19 pandemic and bus operator shortages, Palm Tran has had to adjust bus schedules. The minimum and maximum headways, in minutes, for the current schedule are shown below in Table 11-4.

TABLE 11-4: FIXED ROUTE HEADWAYS

Route Category	Minority Status	Routes	Weekday Peak	Weekday Off-Peak	Weekend
Trunk Routes	Minority	1, 2, 3	20-30	20-30	30-60
	Nonminority	N/A	N/A	N/A	N/A
Cross-town Routes	Minority	4, 20, 30, 31, 33, 40, 43, 44, 46, 47, 60, 61, 62, 63, 70	15-120	15-120	30-120 / No service
	Nonminority	10, 73, 81, 91, 92	60	60	60 / No service
Circulator Routes	Minority	49, 71, 80, 94	30-60	30-60	60 / No service
	Nonminority	41, 88	60-80	60 / No Service	60-95 / No service
Express Routes	Minority	N/A	N/A	N/A	N/A
	Nonminority	95	25	N/A	N/A

On weekdays, 12 routes operate with headways of 30 minutes or less, 11 of which are Minority routes. 18 Palm Tran routes operate at 60-minute or greater headways on weekdays, including 17 Minority routes and one nonminority route. Three routes operate at more than 60-minute headways on weekdays, including one route at a 120-minute headway (Route 44).

On Sundays, Routes 1, 3, 31, 43, and 62 operate at 30-minute intervals. All of these routes are Minority routes. Eight routes do not operate on Sundays, which includes six minority routes. All other routes operate at 60-minute headways, with the exception of routes that operate at 75-minute (Route 70), 90-minute (Route 88), and 120-minute (Route 44) headways.

System-wide, the majority of Palm Tran’s routes operate at 60-minute (50%) and 30-minute (20%) headways. All Palm Tran routes have the same headways during peak and off-peak hours with the exception of Route 41, which only operates during peak hours on weekdays and Saturdays and does not operate at all on Sundays. Furthermore, Route 95 (Port St. Lucie Express) only operates during peak hours. The average scheduled headway for Palm Tran routes is 51 minutes on weekdays and 58 minutes on weekends, as shown in Table 11-5. The average headways for Minority routes are nearly identical to the system-wide averages, at 52 minutes on weekdays, 58 minutes on Saturdays, and 57 minutes on Sundays. Minority route average headways are near the system-wide average headways and well-below the Nonminority route average headways, indicating no disparate impact in scheduled service frequency.

TABLE 11-5: AVERAGE SCHEDULED HEADWAYS

		Weekday	Saturday	Sunday
System-wide		51.31	57.97	57.83
Local	Minority	51.88	57.90	56.36
	Nonminority	60	60	90
Express	Minority	N/A	N/A	N/A
	Nonminority	25	N/A	N/A

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

11.2.5 Vehicle Loadings

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

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

The maximum passenger load per bus should not exceed 150% of the seating capacity for all Palm Tran fixed route services. In other words, in a low-floor 35-foot bus that has 30 seats the bus will be described as crowded if more than 45 people are on board (30 seats + 15 (50% of 30) = 45). Vehicle loads for Palm Tran buses are listed below in Table 11-6.

TABLE 11-6: VEHICLE LOAD FOR PALM TRAN BUSES

Vehicle Type	Vehicle Passenger Capacities			
	Seated	Standing	Total	Maximum Passenger Load
29' Gillig	23	12	35	1.5
35' Gillig	30	15	45	1.5
40' Gillig	37	19	56	1.5
60' New Flyer*	58	29	87	1.5
MCI Coach	56	0	56	1.5

*Not in active fleet

Palm Tran will monitor peak loads on lines that are at or above ratios. When loads at the peak load point exceed vehicle load standards, service should be evaluated for adjustment. Systemwide evaluations will be conducted annually. This standard has not been modified since September 2013.

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

The average vehicle load system-wide is 0.14, while the average maximum vehicle load systemwide (an average of the highest load of each route) is 0.53. Minority routes have a slightly higher average load (0.15), while Non-Minority routes are slightly lower (0.10). Minority routes have an average maximum load of 0.57 and Non-Minority routes have an average maximum load of 0.34. For Minority routes as well as for routes system-wide, the average maximum load ratio falls well below the 1.5 threshold.

The difference between the Minority route and System-wide maximum load ratio is about four percent, as evident in Table 11-1. This is below Palm Tran's 5% disparate impact threshold. Additionally, the maximum load ratio for minority routes is still far below the maximum load threshold of 1.5 and does not indicate any concerns for overcrowding. Therefore, there is no finding of disparate impact.

TABLE 11-7: VEHICLE LOAD RATIO

	Average Load Ratio	Maximum Load Ratio
System-wide	0.13	0.52
Minority	0.13	0.54
Nonminority	0.06	0.28

While all of Palm Tran's routes fall well below the threshold of 1.5 for maximum vehicle load, three routes have average maximum load ratios of one or higher: Routes 1, 3, and 62. These routes currently utilize 40-foot buses, therefore the maximum load for those routes is 56. Route 1 has the highest maximum load ratio at 1.29.

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

11.2.6 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 $\frac{3}{4}$ 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 74% of the county population must walk to obtain access to Fixed Route is $\frac{3}{4}$ of one 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 $\frac{3}{4}$ of a mile to each side of fixed routes.

Those located within $\frac{3}{4}$ 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.

As presented in Table 11-8, 74.17% of Palm Beach County's population resides within three-quarters of a mile of fixed route transit service, which is below Palm Tran's service availability goal. In contrast, 85.45% of the County's minority population is within a $\frac{3}{4}$ -mile walk of service, indicating that Palm Tran meets its goal for service availability to minority residents.

TABLE 11-8: FIXED ROUTE SERVICE AVAILABILITY WITHIN $\frac{3}{4}$ OF A MILE

Area	Percent of Palm Beach County total population within $\frac{3}{4}$ mile of a route	Percent of Palm Beach County minority population within $\frac{3}{4}$ mile of a route	Percent difference between minority accessibility and total accessibility
Systemwide	74.17%	85.45%	15.20%
Minority routes	73.58%	84.77%	15.21%
Nonminority routes	2.10%	1.76%	-19.32%

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

11.3 Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. Palm Tran has prepared the following policies for its transit system depicted in Table 11-9.

TABLE 11-9: PALM TRAN SERVICE POLICIES

Characteristic	Service Standard
Vehicle Assignment	Average vehicle age on minority transit routes must be less than 150% of the average vehicle age on nonminority transit routes
Distribution of Transit Amenities	Based on ridership, location, and network connectivity, bus stop amenities will be placed where there is sufficient right-of-way or easement

11.3.1 Vehicle Assignment

Palm Tran policy ensures that the average vehicle age for minority routes is 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.

As of July 2025, the average age of all Palm Tran vehicles is approximately 4 years and 11 months, which indicates a threshold for disparate impact at 7 years and 5 months. The current average age for Minority route vehicles is also 4 years and 11 months, which is nearly identical to the system average and 2 and a half years below the disparate impact threshold. Nonminority route vehicles are an average of 3 years and 10 months, below the average age of all Palm Tran vehicles.

TABLE 11-10: AVERAGE FIXED ROUTE FLEET AGE

	Average Fleet Age
Systemwide	4 years 11 months
Minority	4 years 11 months
Nonminority	3 years 10 months

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

11.3.2 Distribution of Transit Amenities

Palm Beach County's policy directs Palm Tran to provide bus stop amenities based on ridership, location, and connectivity to other bus routes where there is sufficient right-of-way and/or dedicated transit easement. This policy has not been modified since September 2013.

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

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

Documented in Table 11-11, there are 2,988 bus stops in the Palm Tran system, and over one-third of bus stops provide some seating. System-wide, about 36% of stops on minority routes provide some type seating, compared to 42.5% of nonminority stops. Bus stops on minority routes account for 98.5% of all Palm Tran bus stops.

TABLE 11-11: DISTRIBUTION OF PALM TRAN TRANSIT AMENITIES

	Stops with shelters	Stops with benches only	Stops with Simme-Seats	Stops with any seating	Stops with bike racks
Systemwide	19.5%	9.1%	7.5%	36.1%	2.8%
Minority	19.5%	8.7%	7.7%	35.9%	2.8%
Nonminority	17.8%	23.3%	1.4%	42.5%	1.4%

12 SERVICE CHANGE PROCESS

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

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

The process comprises of the following attributes:

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

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

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

12.1 Service Change Process Overview

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

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

12.2 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

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:

1. On-Time Performance: +/- 10% of the average performance of the sampled routes.
2. Headway: +/- 5 minutes of the average performance of the sampled routes.

3. Vehicle Load: + 5% of the maximum vehicle load.
4. 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.

12.3 2025 Title VI Update General Review Conclusions

Considering most of Palm Tran's fixed routes are considered Minority routes (28 out of 30, or 93.3%) and nearly 48% of Palm Beach County's population is considered minority, the following general conclusions were drawn from the service analysis.

On-time Performance

- System wide, Palm Tran routes were on time 76.99% of the time, performing slightly below the agency's threshold for on-time performance (78%).
- Non-Minority routes were on time 1.39% more than average and Minority routes fell just 0.04% below average.

Service Frequency

- Scheduled service frequency on Minority routes is slightly better than system-wide averages on all days; nonminority local routes average longer headways on all days and have limited services on Sundays compared to the system-wide averages.

Vehicle Load

- Vehicle loads on minority routes are well below the established 150% threshold for vehicle loading.
- Of the top five routes with the highest maximum vehicle load, three are trunk routes, and all five routes are Minority routes.

Service Availability

- Approximately 74% of Palm Beach County's population resides within $\frac{3}{4}$ of a mile of transit service, falling below the agency's service availability goal of 80%. In comparison, about 85% of the County's minority population is within $\frac{3}{4}$ of a mile of service, meeting the agency's goal for service availability.

Vehicle Assignment

- Vehicles assigned to Minority routes average almost 5 years old, which is 2 and a half years below Palm Tran's threshold of 7 years and 5 months and is nearly identical to the system average. Nonminority routes have an average age of 3 years and 10 months.

Distribution of Transit Amenities

- The share of bus stops on Minority routes with any transit amenity (35.9%) is about equal to the share of all Palm Tran bus stops with amenities (36.1%). 98.5% of these stops are on minority routes.

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

13 DEMOGRAPHIC AND SERVICE PROFILE MAPS

FTA Circular 4702.1B: In order to comply with the reporting requirements in 49 CFR Section 21.9(b), transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population shall collect and analyze racial and ethnic data as described below in order to determine the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance from FTA.

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 preservation. There are some small communities located near the western boundary of the county around Lake Okeechobee. The distribution of population in Palm Beach County creates a very challenging environment for Palm Tran by requiring very long routes that often run through sparsely populated areas to connect different centers.

The 2020 Decennial Census data identified 1,492,191 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 2020, 47.74% of residents in Palm Beach County were members of a minority group.

13.1 Minority Population in Palm Beach County

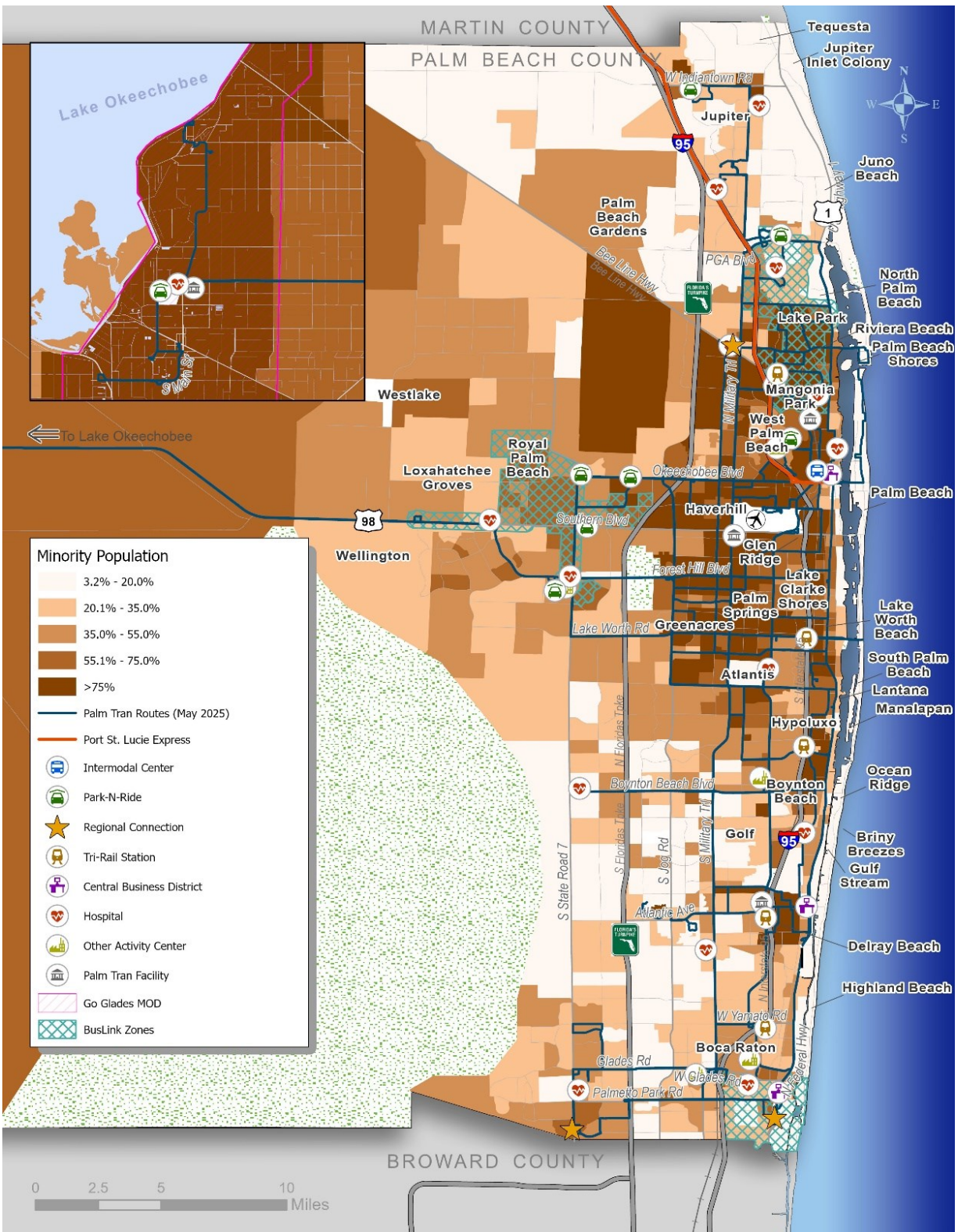
Table 13-1 below shows the population proportion of different racial and ethnic demographics within Palm Beach County in 2020. About 52% of residents identified as white alone, followed by 23% as Hispanic or Latino and 17% as Black or African American alone. Minority groups in Palm Beach County accounted for 47.74% of the total population in 2020.

TABLE 13-1: RACE AND ETHNICITY IN PALM BEACH COUNTY

Demographic	2020 Population	Percentage
Hispanic or Latino	349,933	23.45%
White Alone	779,759	52.26%
Black or African American Alone	255,724	17.14%
American Indian and Alaska Native Alone	1,536	0.10%
Asian Alone	43,356	2.91%
Native Hawaiian and Other Pacific Islander Alone	494	0.03%
Some Other Race Alone	10,766	0.72%

Figure 13-1 illustrates the concentration of minority populations by block groups. Many areas surrounding West Palm Beach such as Glen Ridge, Haverhill, Mangonia Park, and Lake Park have minority populations exceeding 75%. Furthermore, every community within Go Glades MOD zone had minority populations upwards of 75% and over 50% in surrounding blocks.

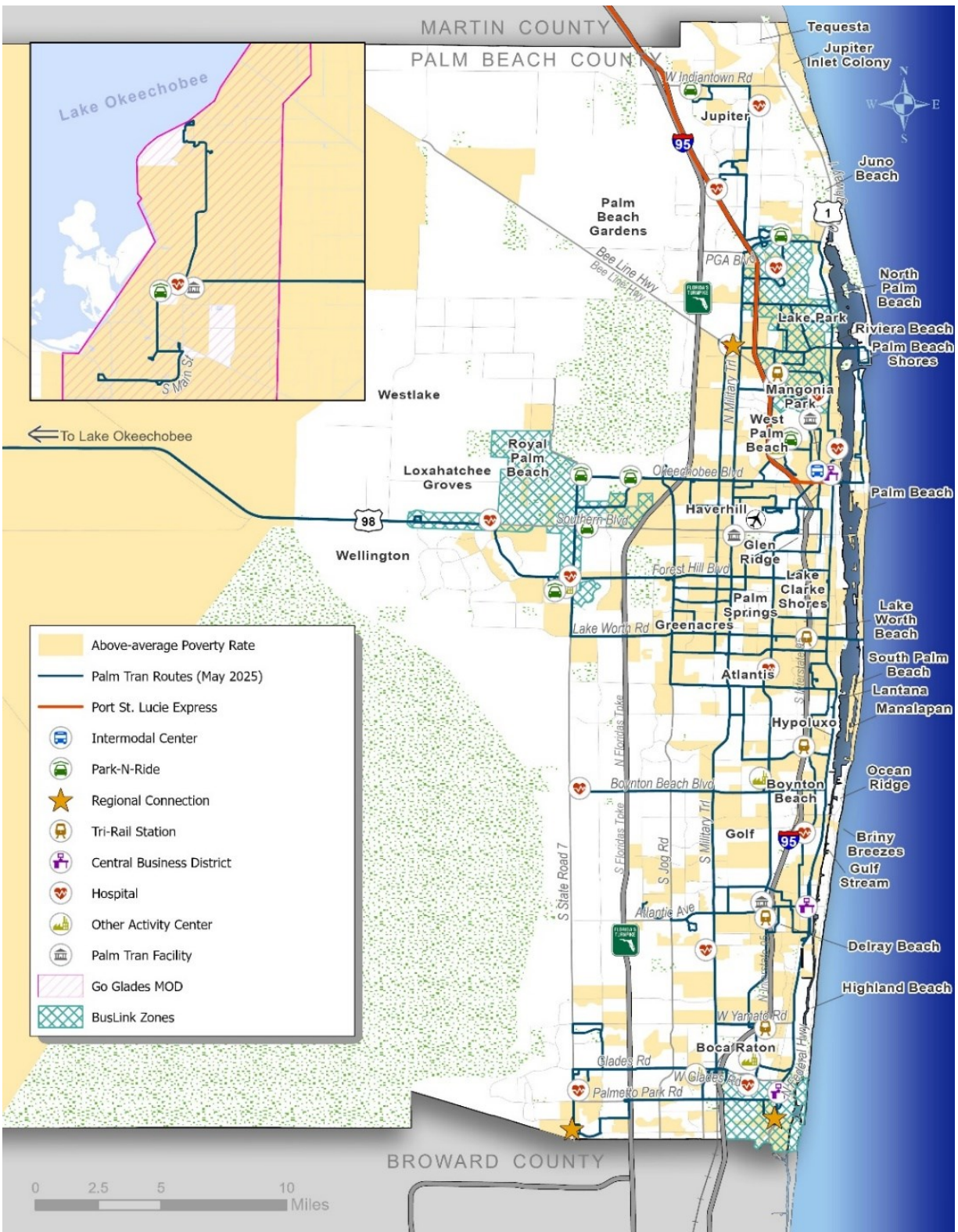
FIGURE 13-1: MINORITY POPULATION



13.2 Low Income Population in Palm Beach County

Figure 13-2 demonstrates the demographics of Palm Beach County's poverty rate. It depicts the location of block groups with poverty rates above the county average (11.08%) per 2023 ACS data. Similarly to Figure 13-1, concentrations are near Lake Park, Haverhill, Mangonia Park, East of West Palm, and near Lake Okeechobee. Many of these communities' poverty rates are above 35% and even more have ranges between 20-35%.

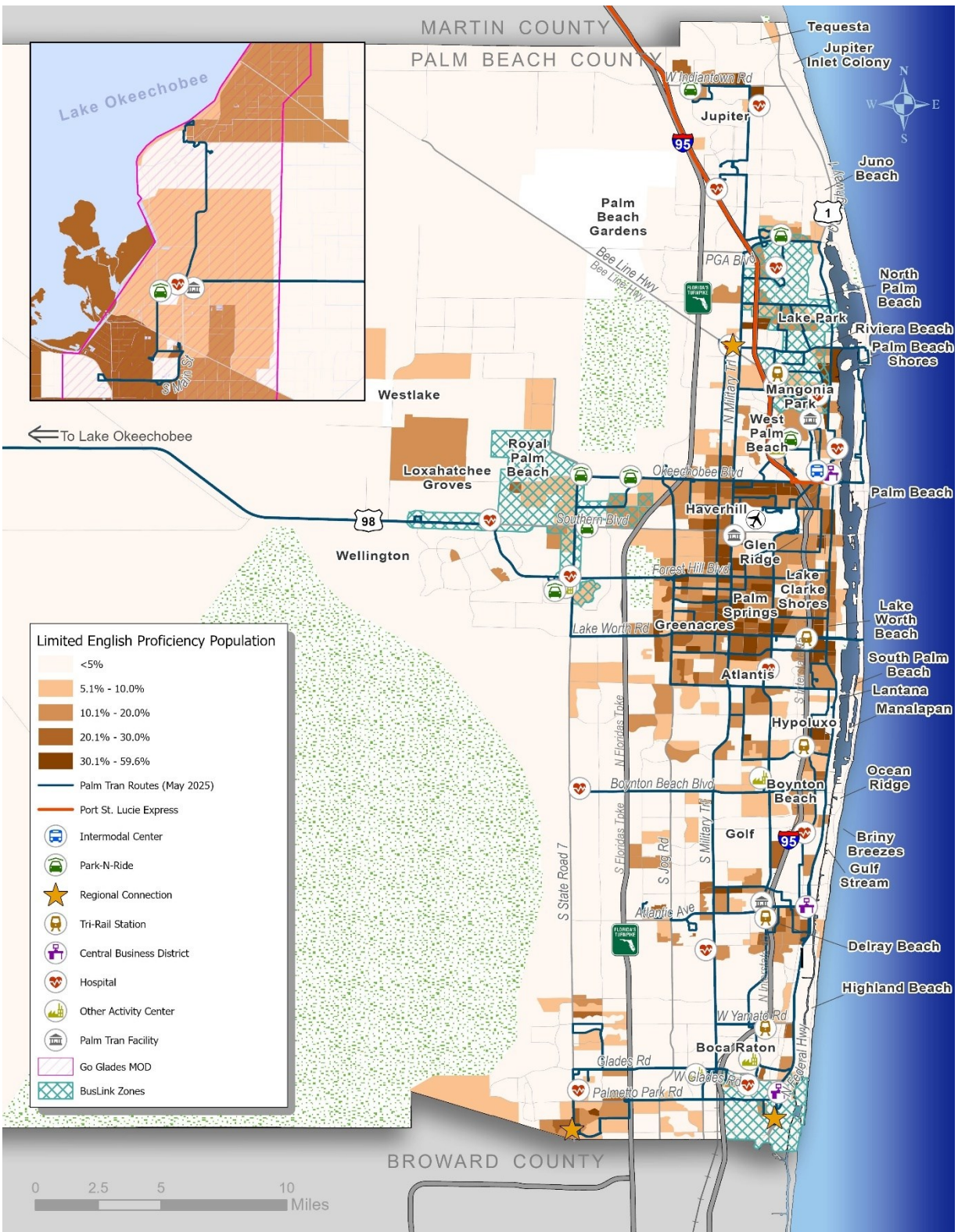
FIGURE 13-2: POVERTY RATE



13.3 Limited English Proficiency in Palm Beach County

Figure 13-3 depicts Palm Beach County's population with Limited English Proficiency (LEP). It depicts the rate of LEP population by block group per 2023 ACS data. The highest concentrations of LEP population can be found in Lake Worth Beach, Palm Springs, Greenacres, Haverhill, and West Palm Beach. LEP individuals can comprise over 30% of the total population in those communities.

FIGURE 13-3: LIMITED ENGLISH PROFICIENCY IN PALM BEACH COUNTY



14 RESULTS OF SERVICE AND/OR FARE EQUITY ANALYSES

FTA Circular 4702.1B: Transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population shall include the information in paragraph a(1) above, and will also include results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission.

The following sections detail results of equity analyses completed since the 2022 Title VI Update. Summaries of board actions for the service changes described below are included in Appendix K.

14.1 2022 Service Changes (Routes 20 and 49)

The September 2022 Service Equity Analysis for Palm Tran’s Route 20 and Route 49 found no disproportionate adverse impacts on low-income or minority populations. Although the changes included the elimination of Route 49, its service was fully absorbed into Route 20 with no loss of bus stops, span, or frequency. Using a ¼-mile walkshed buffer and GIS analysis, the evaluation confirmed that access to transit services remained consistent for Title VI protected populations. As a result, the proposed changes met federal equity requirements and did not require any mitigation measures. See Appendix F for the service equity analysis of Routes 20 & 49.

14.2 2023 Service Changes (Routes 20, 21, 33, and 52)

The 2023 Palm Tran Service Equity Analysis evaluated the proposed elimination of Routes 21 and 52 and major route changes to Routes 20 and 33. For each change, the analysis compared the affected populations—those within a quarter mile of the impacted routes—to Palm Beach County averages to determine if there were any disparate impacts on minority populations or disproportionate burdens on low-income populations. In all cases, the analysis found that the differences did not exceed Palm Tran’s 20% threshold. Therefore, none of the changes resulted in adverse equity impacts, and no mitigation was required. However, Palm Tran implemented “BusLink” TNC zones to maintain access in areas affected by discontinued route segments. Refer to Appendix G for further details.

14.3 Port St. Lucie Express (PSLX)

The Palm Tran Port St. Lucie Express (PSLX) Service Equity Analysis found that minority and low-income populations near the proposed commuter bus stops in Port St. Lucie and West Palm Beach would benefit from the new service. In Port St. Lucie, 46% of the population within the 5-mile catchment area are minorities, compared to 33% countywide, indicating a 39% higher concentration. In West Palm Beach, the catchment area has a 42% minority population versus 25% countywide, and a 17% low-income population versus 12% countywide, representing 68% and 42% higher concentrations, respectively. These variations exceed the federal 20% threshold used to assess disproportionate impacts, and since the PSLX is a new service, the impacts are considered positive, improving access to transit for underserved populations. See Appendix H for the 2023 Port St. Lucie Express Service Equity Analysis.

The fare equity analysis for the proposed PSL Express service evaluated potential impacts on minority and low-income populations across proposed park-and-ride locations. The analysis revealed disproportionate impacts in Port St. Lucie and West Palm Beach, where minority and low-income population percentages exceeded county averages by more than the 20% federal threshold. Specifically, Port St. Lucie had a 39% higher minority population than the St. Lucie County average, and West Palm Beach had a 68% higher minority population and a 42% higher low-income population than Palm Beach County averages. Despite these findings, the proposed fare of \$2.65, aligned with peer agencies in Florida, such as Broward County Transit (BCT) and Miami-Dade Transit (MDT), is considered reasonable and consistent with regional practices. Since this is a new service intended to expand affordable access to employment, the fare policy is seen as supportive of mobility equity, particularly benefiting communities with limited transportation options. Palm Tran ultimately decided to adopt a fare of \$3.00 per ride, aligning with other peer agencies such as PSTA and HART. This decision reflected the fact that the PSL Express route covers a much longer distance than the commuter services offered in Broward and Miami-Dade counties. See Appendix I for more information.