

Title VI — Service Equity Analysis

Sunday Service Reinstatement for Route 48



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PREPARED BY

GFT

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1. INTRODUCTION

Under Title VI of the Civil Rights Act of 1964, as recipients of federal financial assistance, the Broward County Board of County Commissioners, without regard to race, color, or national origin, operate and plan for transit services so that: transit benefits and services are available and provided equitably; transit services are adequate to provide access and mobility for all; opportunities to participate in the transit planning and decision-making process are open and accessible; and that remedial and corrective actions are taken to prevent discriminatory treatment of any beneficiary.

This Title VI Service Equity Analysis has been conducted by the Broward County Transportation Department (BCTD), Service and Strategic Planning, to evaluate the proposed reinstatement of Sunday service on Route 48:

- The route will retain its existing weekday and Saturday alignment.
- The route Service span will be similar to that of its Saturday schedule

This report has been prepared in compliance with Title VI requirements to ensure that there are no potential disparate impacts or disproportionate burdens on minorities and low-income populations.

2. ABOUT BROWARD COUNTY TRANSIT

Broward County Transit (BCT) provides a fixed-route bus service, transit facilities, and related benefits within the urbanized area of Broward County. BCT consists of seven divisions: Administration, Capital Program, Fleet Services, Operations, Paratransit, Rail, and Customer Experience and Safety. BCTD is comprised of more than 1,440 individuals working together to deliver public transportation services and to provide and maintain the fleet vehicles to support Broward County's government operations within the county's developable area of approximately 410 square miles to serve our 1.9 million residents.

Public transportation services are provided by BCT through a network of transit services, including the operation of a fleet of 406 buses on 46 fixed routes, with several routes connecting with Palm Tran (in Palm Beach County), Miami-Dade Transit (in Dade County), Brightline VIA Aventura Mall (in Dade County), and Tri- Rail (Commuter Rail Service); 337 paratransit vehicles providing contracted services for the transportation disadvantaged and persons with disabilities; 65 minibuses and mid-sized buses operated in partnerships with municipalities and other entities for Community Shuttle service, fixed-route bus service to Tri-Rail stations, and partnerships with other entities to provide alternative local public transit services.

3. PROPOSED SERVICE CHANGE

Route 48 currently operates Monday through Saturday along Hillsboro Boulevard between US-441 and A1A Deerfield Beach. Route 48 Sunday service was discontinued in October 2010 due to budgetary reductions along with other changes and eliminations systemwide. Due to a documented gap in Sunday transit access on this corridor and customer requests, BCT proposes to reinstatement Sunday service with a span of 6:00 AM to 10:00 PM and a frequency of approximately 35 minutes.

This adds approximately 543 revenue miles per week. The existing weekly total is approximately 2,721 revenue miles (5 weekdays + 1 Saturday)¹, and the addition of Sunday brings it to 3,264 revenue miles. This reflects a 19.9% increase in total weekly revenue miles, which is below the 25% major change threshold. While this is below the 25% threshold for a major service change, it still qualifies as such under BCT's Title VI policy because it reinstates service on a day that has been unserved since 2010.

An equity analysis is required when a service change meets the definition of a major service change per BCT's Title VI policy. According to FTA Title VI Requirements and Guidelines², if a temporary service change lasts more than twelve months, it is considered permanent. Since Sunday service was discontinued in 2010, the reinstatement is treated as a new service and therefore requires a Title VI equity analysis.

Table 1 presents the thresholds used to identify such changes. According to this policy, the addition of Sunday service for Route 48—where no service currently exists—constitutes the establishment of service on a new day. As such, even though the change does not exceed thresholds related to revenue miles, etc., it qualifies as a Major Service Change due to the expansion of service to a previously unserved day. Therefore, a Title VI Service Equity Analysis is required to evaluate potential impacts on Protected Populations.

Due to the requirements of Title VI, BCT has conducted this analysis to identify any potential disparate impacts or disproportionate burdens. This demonstrates BCT's commitment to transparency, compliance with federal guidelines, and ensuring that all communities, especially those historically underserved, have access to vital public transportation services.

Table 1: BCT Major Change Thresholds

Service Change	Major Service Change Threshold
Service Miles	More than 25% route or weekly revenue miles
Express Service Miles	More than 50% route or weekly revenue miles
Headways/Frequency	More than 15 minutes
Route	Establishment or discontinuation of a route
Fares	Any change in fares

Source: [BCT Website - Title VI Major Service Change Policy](#)

¹ Revenue miles calculated based on the Route 48 schedule provided here, <https://www.broward.org/BCT/Schedules/Documents/rt48web.pdf>

² https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf, Chapter IV

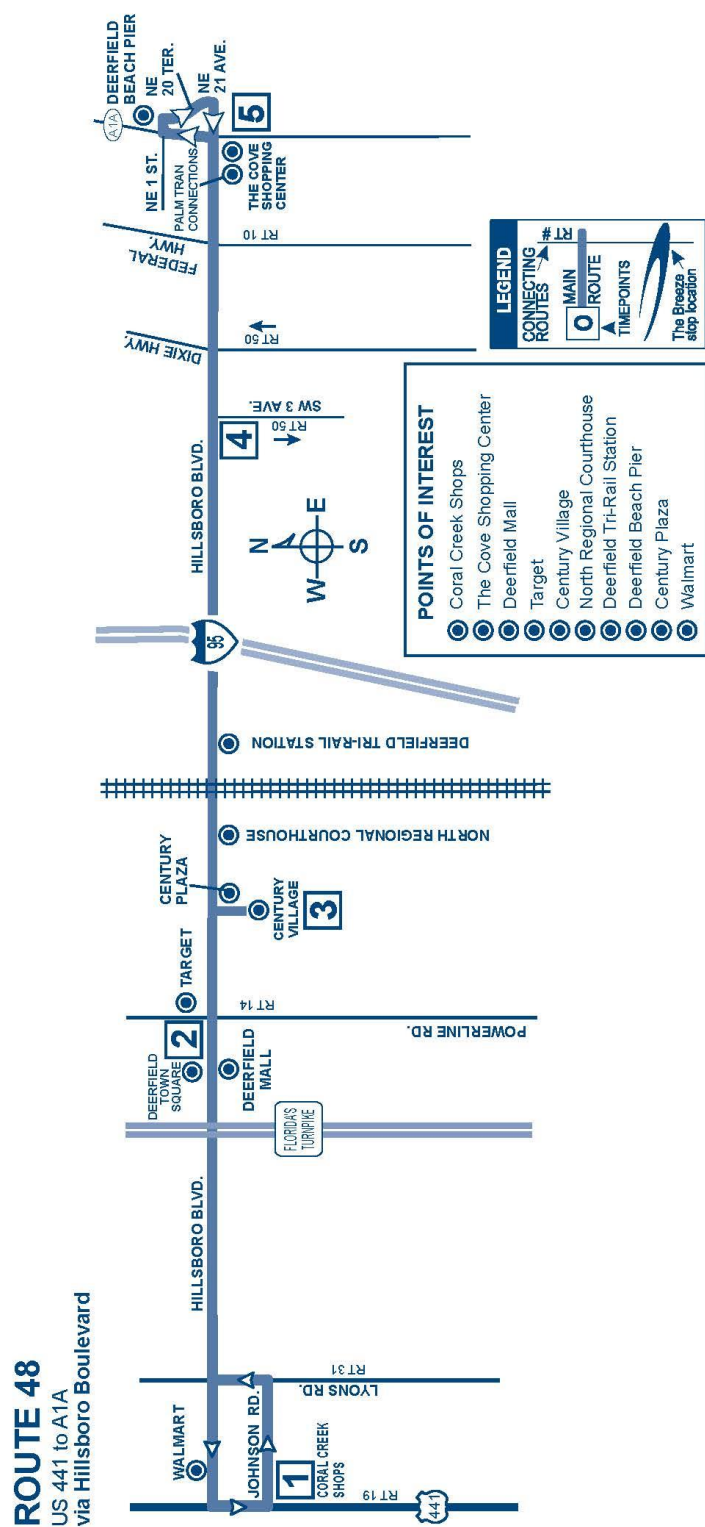


Figure 1: Route 48 Map

4. SERVICE EQUITY ANALYSIS

In accordance with Title VI of the Civil Rights Act of 1964, a service equity analysis is necessary to assess potential disparate impacts or disproportionate burdens on Title VI Protected Populations before implementing any major service changes. This section will evaluate the demographic changes under the Reinstatement of Route 48 to ensure no adverse effects on Title VI Protected Populations.

In this analysis, the ridership survey was used to evaluate the potential effects of the proposed major service change. According to FTA Title VI Requirements and Guidelines, the recommended approach is using ridership survey data to determine the minority and non-minority population ridership of the affected route and the minority and non-minority ridership of the entire system. For example, when making headway changes, eliminating a route, or increasing service to an area currently served by the transit system, the appropriate comparison population would likely be ridership, and the transit provider would compare the ridership of the affected route(s) with the ridership of the system.

For this analysis, demographic characteristics of populations were assessed using data from the 2023 ridership survey, with a specific focus on minority, low-income, and Limited English Proficient (LEP) populations. More details on this ridership survey data are provided in the appendix.

The results of the analysis indicate that while the addition of Sunday service results in a disparate impact on minority populations—defined by BCT’s thresholds—it does not constitute a disproportionate burden on low-income populations. Importantly, the expansion provides new service on a day where none currently exists. Given the high concentration of low-income and LEP populations within the area, the Sunday service reinstatement is expected to provide meaningful access and benefits to historically underserved communities. As such, although a disparate impact is identified in the data, the change is expected to provide a favorable outcome overall.

4.1. QUANTITATIVE ANALYSIS

The Quantitative Analysis section provides a comprehensive examination of the data used to assess the impacts of the proposed changes to Route 48. This analysis is essential for understanding how the service modifications will affect various demographic groups, particularly those protected under Title VI. To quantify these impacts, the number of individuals who would benefit from or be adversely affected by the changes was calculated. Data from the 2023 ridership survey was used to analyze the demographics of riders on Route 48.

This section examines the potential impacts of the service reinstatement on individuals who use Route 48. The primary goal, in accordance with FTA Title VI Requirements and Guidelines, is to ensure that Title VI Protected Populations are not adversely affected by this change.

4.1.1. MINORITY POPULATION

This subsection analyzes all racial and ethnic groups identified in the Title VI Program for both Route 48 and systemwide riders. The table below compares the percentage of minority and non-minority populations using this route based on 2023 ridership survey data. Based on Title VI definitions, a person or rider who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or some other race is considered in the minority group.

Table 2: Service Equity Analysis – Increase In Service For Minority Population

	Route 48		Systemwide			
RACE	Population	%	Population	%	Difference	BCT Threshold
Non-White (Minority)	29	64%	6,189	86%	-22%	< -15%
White alone	16	36%	970	14%	Disparate Impact	

Source: Data from BCT 2023 Ridership Survey Data

The proportion of minority riders on Route 48 is 22 percentage points lower than the whole system, which exceeds BCT’s disparate impact threshold of -15%³. Therefore, the analysis indicates a potential disparate impact. However, this impact is mitigated by the fact that:

- No transit service currently exists on Sundays along this corridor.
- The change introduces a benefit by expanding access to minority residents within the corridor.
- The service alignment remains unchanged, and no riders lose access.

Thus, while there is a disparate impact, the net effect of the service change is an improvement in transit access for all riders, including minorities. An important consideration in this equity analysis is the presence of existing infrastructure along Route 48—since it already operates on weekdays and Saturdays, all necessary facilities are in place, allowing Sunday service to be added with no new capital investment.

4.1.2. LOW-INCOME POPULATION

This subsection examines households below the poverty line as identified in the Title VI Program for both Route 48 and systemwide riders. The table below compares the number of low-income and non-low-income populations among riders on Route 48 and riders systemwide. Low-income individuals are defined as those whose income falls below the poverty level, based on the 2022 Health and Human Services (HHS) Poverty Guidelines⁴. For this analysis, total annual household income⁵ and household size were obtained

³ Per BCT Title VI program, for routes with adverse effects (reductions) the disparate impact or disproportionate burden threshold is 15% or greater. For routes without adverse effects (benefits) the disparate impact or disproportionate burden threshold is -15% or less.

⁴ <https://aspe.hhs.gov/sites/default/files/documents/4b515876c4674466423975826ac57583/Guidelines-2022.pdf>

⁵ The question on the ridership survey is as follow “Which of the following income ranges BEST describes your TOTAL ANNUAL HOUSEHOLD INCOME in 2022?”

from the ridership survey. The reported household income ranges were compared to the 2022 HHS thresholds, adjusted by household size.

Table 3: Service Equity Analysis - Increase In Service For Low-Income Population

	Route 48		Systemwide			
INCOME	Population	%	Population	%	Difference	BCT Threshold
Low-Income	19	66%	3,535	60%	6%	< -15%
Non-Low-Income	10	34%	2368	40%	No Disproportionate Burden	

Source: Data from BCT 2023 Ridership Survey Data

The proportion of low-income riders on Route 48 exceeds the whole system by 6%, which is within BCT's established disproportionate burden threshold of 15%. This indicates that the proposed service enhancement does not negatively affect low-income populations—in fact, it provides clear benefits. By introducing Sunday service along Route 48, low-income individuals, who often have limited access to private vehicles and rely heavily on public transportation for essential travel such as commuting to jobs with weekend shifts, attending religious services, shopping for necessities, etc. will gain a critical mobility option that was previously unavailable. The reinstatement of Sunday service helps ensure that these riders have continuous and reliable access to transit throughout the week.

4.1.3. LIMITED ENGLISH PROFICIENCY

This subsection analyzes LEP populations for both Route 48 riders and systemwide riders as identified in the Title VI Program. LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported on the ridership survey that they speak English less than very well, not well, or not at all.

Table 4: Service Equity Analysis - Increase In Service For LEP Population

	Route 48		Systemwide			
LEP	Population	%	Population	%	Difference	BCT Threshold
Limited English Proficiency (LEP)	13	76%	1,141	46%	30%	< -15%
General Population	4	24%	1,340	54%	No Negative Effect	

Source: Data from BCT 2023 Ridership Survey Data

As shown in table 4, LEP riders make up 76% of Route 48's ridership—30 percentage points higher than the overall percentage of LEP riders among all surveyed riders systemwide. This suggests that the proposed change will particularly benefit a historically underserved population with limited language access. The increase in service will significantly enhance mobility and access to opportunities for LEP individuals.

4.2. SUMMARY OF KEY FINDINGS

- The reinstatement of Sunday service on Route 48 qualifies as a Major Service Change under BCT's Title VI policy due to the introduction of service on a new day.
- Minority population on Route 48 is lower than the systemwide average by 22%, which exceeds BCT's 15% threshold, triggering a potential disparate impact.
- Despite this statistical finding, the proposed change results in a net benefit to all riders, particularly in an underserved corridor with high concentrations of low-income and LEP populations.
- The proposed change does not impose a disproportionate burden on low-income individuals.
- The significant presence of LEP riders on Route 48 means the change will improve service access for populations with communication barriers.

5. CONCLUSIONS

The analysis of the proposed reinstatement of Sunday service to Route 48 indicates a disparate impact on minority populations, as the minority representation among Route 48 riders is 22 percentage points lower than all surveyed riders systemwide, exceeding BCT's 15% threshold. However, this service enhancement does not constitute a disproportionate burden on low-income populations.

Despite the identified disparate impact, the proposed service change aims to address a significant need by providing transit access on Sundays—a day currently lacking service along this corridor. This enhancement is expected to benefit all riders, including minority and low-income populations, by improving access to employment, education, healthcare, and other essential services.

An important consideration in this equity analysis is the presence of existing infrastructure along Route 48. Since this route already operates on weekdays and Saturdays, all necessary physical infrastructure—including bus stops, shelters, signage, and operational logistics—is already in place. This allows for the reinstatement of Sunday service with minimal infrastructure development.

By leveraging the existing infrastructure, BCT can implement the new service in a cost-efficient manner, reducing the need for expenditures associated with new route creation such as planning, permitting, or facility construction. These cost savings not only support the fiscal sustainability of the proposed change but also create an opportunity to reinvest any saved resources into other equity-focused service enhancements across the system in the future.

In addition, operating along an established route minimizes service disruption and facilitates immediate benefit to existing and potential riders—including Title VI Protected Populations—who currently have no access to public transit on Sundays. Thus, while a disparate impact was identified, the operational efficiency, increased connectivity and mobility, and economic practicality of expanding service on a corridor already equipped for transit strongly support the reinstatement of the proposed service.

This proposed change improves transportation access for all people including minorities and economically

disadvantaged communities without imposing additional costs or service losses. In this context, not only is there no negative impact, but the service change will be viewed as positive by directly addressing the mobility needs of a vulnerable population.

6. APPENDIX

6.1. DEFINITIONS⁶

Disparate Impact: Refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lack a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden: Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where possible.

Fixed Route: Refers to the public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Low-Income person: Is defined as someone whose household income is at or below the U.S. Department of HHS Poverty Guidelines. The FTA encourages using a threshold of 150 percent of the poverty line based on family size to better capture low-income populations. According to the ACS 5-year estimate data, the median household income in Florida over the past 12 months in 2022 and 2023 are approximately \$69,303 and \$71,711, respectively.

Minority persons: A person who identifies as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or some other race.

Service Area: Refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization. BCT⁷ defines Service Area as "census tracts intersecting with the ¼-mile buffer around local routes and/or 3-mile buffer around Park-n-Ride stations of express routes.

Limited English Proficient (LEP) persons: Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

⁶ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf, FTA C 4702.1B

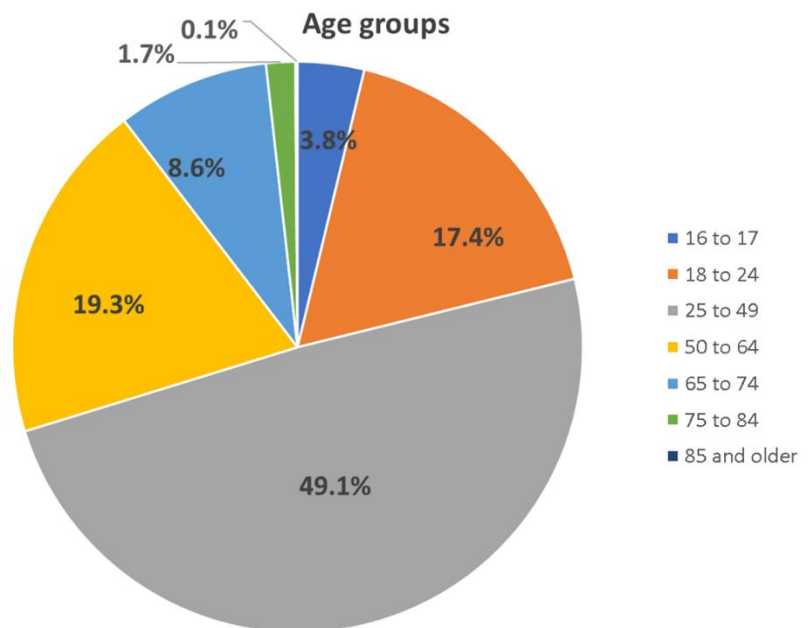
⁷ BCT - Title VI Program Update, December 2023-2026

6.2. 2023 RIDERSHIP SURVEY DEMOGRAPHIC ANALYSIS

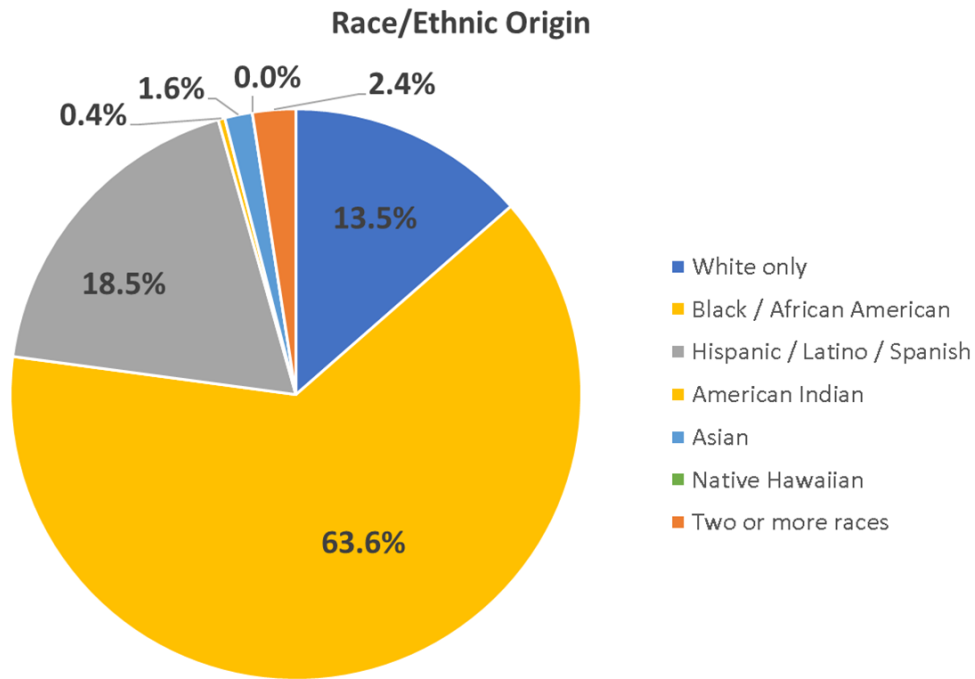
Over the past two decades, Broward County has undergone a continued demographic transformation, marked by increasing racial and ethnic group growth. According to the most recent data from the U.S. Census Bureau (2023 estimates), Broward remains a “minority-majority” county. The Non-Hispanic White population now represents less than one-third of the total population, continuing a trend seen in the previous Census data.

To ensure that transit planning remains responsive to the needs of its ridership, BCT conducted a ridership survey between September and November 2023. This effort collected demographic and travel behavior data from a representative sample of 7,324 riders across the fixed-route system. The survey captured responses to a wide range of questions related to demographics and travel patterns, offering valuable insight into the characteristics of the transit-dependent population. These findings support equitable service planning and delivery. A summary of BCT’s fixed-route demographic profile is provided below, followed by visualizations—including pie charts—illustrating the composition of the riders by race, income, and other key equity indicators.

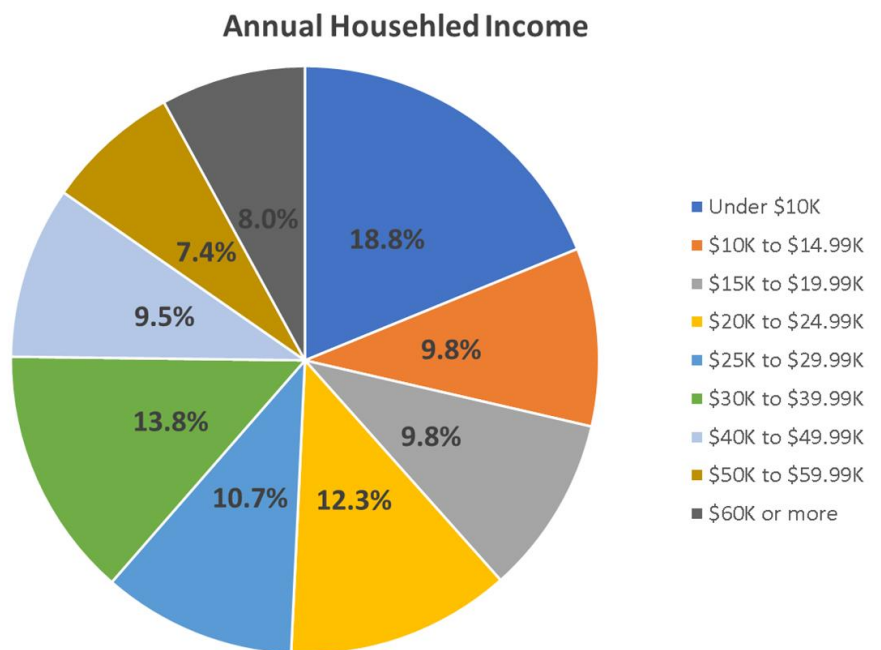
A total of 86% of BCT riders are between the ages of 18 and 64. Within this range, approximately 50% are aged 25 to 49. Seniors, defined as those 65 years or older, account for about 10% of the ridership, while youth under the age of 18 make up only 4%.



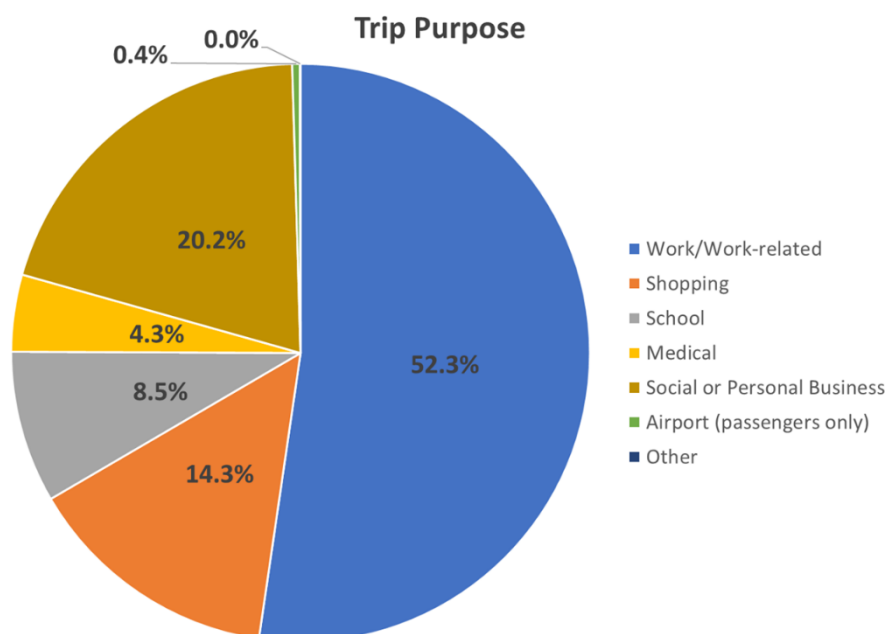
Minorities make up over 86% of BCT's systemwide ridership. Approximately 64% identify as Black or African American, 18% as Hispanic or Latino, and about 4.5% as Asian, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, or Multiracial. Non-Hispanic White riders represent the remaining 14%.



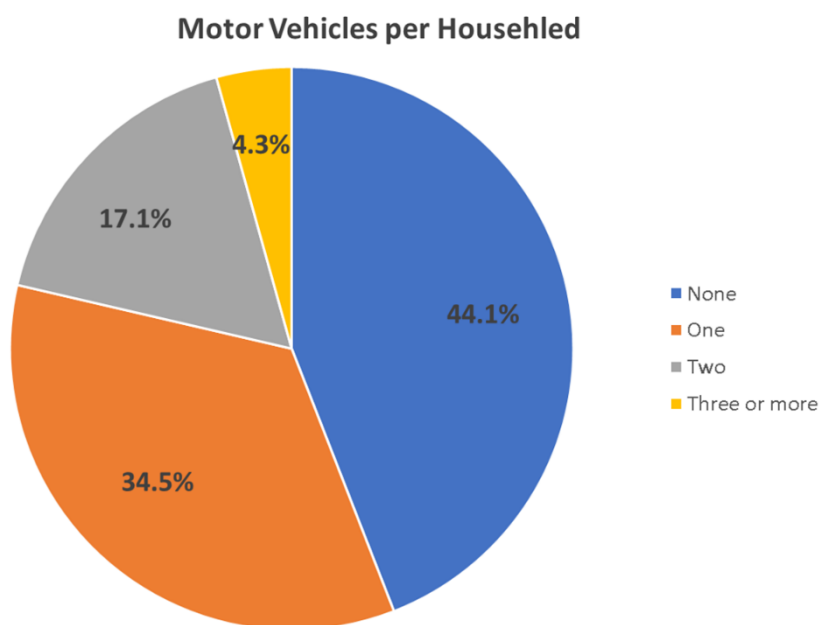
Almost half (51%) of BCT riders report annual household incomes below \$25,000, including 19% earning less than \$10,000. Since 2008, the percentage of riders with higher incomes has steadily increased, largely due to the expansion of Premium Express Services.



The majority of riders (52%) use BCT primarily for commuting to work. Other common trip purposes include social or personal business (20%) and shopping (14%). The remaining trips are for school (8%), medical services (4%), and other purposes (0.04%).



Vehicle access remains limited among BCT riders: 44% report having no vehicle available in their household, while 35% have access to only one vehicle.



More than half of BCT riders (52%) report speaking English very well. However, 5% of riders have no ability to speak English.

