



Chicago Metropolitan  
Agency for Planning

**Title VI of the  
1964 Civil Rights Act, Section 601  
Specific to Federal Transit  
Administration Programs**

**June 2017**



## **CMAP Board**

### **Executive Committee**

Gerald Bennett, chair

Rita Athas, vice chair

Elliott Hartstein, vice chair

Andrew Madigan, at-large member

Al Larson, at-large member

Carolyn Schofield, at-large member

### **City of Chicago Appointments**

Rita Athas, senior advisor, World Business Chicago

Frank Beal, executive director, Metropolis Strategies

Janel Forde, chief operating officer, City of Chicago

Andrew Madigan, senior vice president, Mesirow Financial

Peter Skosey, executive director, state government affairs, BNSF Railway

### **Cook County Appointments**

Gerald Bennett, mayor, Palos Hills (Southwest Cook)

Al Larson, president, Schaumburg (Northwest Cook)

Richard Reinbold, president, Village of Richton Park (South Cook)

William Rodeghier, president, Western Springs (West Cook)

Peter Silvestri, commissioner, Cook County Board (Suburban Cook)

### **Collar County Appointments**

Elliott Hartstein, former president, Buffalo Grove (Lake)

John Noak, mayor, Romeoville (Will)

Franco Coladipietro, president, Bloomingdale (DuPage)

Carolyn Schofield, member, McHenry County Board (McHenry)

Matt Brolley, president, Montgomery (Kane/Kendall)

### **Non-voting Members**

Sean McCarthy, policy advisor for economic development, Governor of the State of Illinois  
(Governor's appointee)

Brian Oszakiewski, policy advisor for infrastructure, Governor of the State of Illinois  
(Governor's appointee)

Leanne Redden, executive director, Regional Transportation Authority (MPO Policy  
Committee)

## **MPO Policy Committee**

### **Municipal Governments**

Rebekah Scheinfeld, Commissioner, Chicago Department of Transportation

Jeffery Schielke, Mayor, City of Batavia, Council of Mayors

### **County Governments**

John Yonan, Superintendent of Transportation & Highways, Cook County

Thomas Cuculich, Chief of Staff, DuPage County

Christopher J. Lauzen, County Board Chair, Kane County

Scott Gryder, County Board Chair, Kendall County

Aaron Lawlor, County Board Chair, Lake County

Jack Franks, County Board Chair, McHenry County

Lawrence M. Walsh, County Executive, Will County

### **Regional Agencies**

Leanne Redden, Vice Chair, Executive Director, Regional Transportation Authority

Frank Beal, Board Member, Chicago Metropolitan Agency for Planning

Elliott Hartstein, Board Member, Chicago Metropolitan Agency for Planning

### **Operating Agencies**

Randall S. Blankenhorn, Chair, Secretary, Illinois Department of Transportation

Dorval Carter, President, Chicago Transit Authority

John C. McCarthy, President, Continental Air Transport, Private Transportation Providers

Greg Bedalov, Executive Director, Illinois State Toll Highway Authority

Don Orseno, Executive Director, Metra

Richard A. Kwasneski, Chairman of the Board, Pace

Liisa Lawson Stark, Assistant Vice President, Union Pacific Railroad, Class 1 Railroad Companies

### **Federal Agencies (Non-Voting)**

Kay Batey, Division Administrator, Federal Highway Administration

Marisol Simon, Regional Administrator, Federal Transit Administration

## Contents

1.0	General Requirements .....	1
1.1	Title VI Notice to the Public.....	1
1.2	Instructions to the Public Regarding How to File a Title VI Discrimination Complaint .....	1
1.3	Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits .....	1
1.4	Public Participation Plan .....	1
1.5	Plan for Providing Language Assistance to Persons with Limited English Proficiency .....	2
1.6	Racial Breakdown of the Membership of Committees, and a Description of Efforts Made to Encourage the Participation of Minorities on Such Committees .....	5
1.7	Efforts the Primary Recipient Uses to Ensure Subrecipients are Complying .....	6
1.9	Facility Construction.....	6
2.0	MPO Requirements.....	7
2.1	Demographic Profile of the Metropolitan Area that Includes Identification of the Locations of Minority Populations in the Aggregate .....	7
2.2	Procedures by Which the Mobility Needs of Minority Populations are Identified and Considered within the Planning Process .....	7
2.3	Demographic Maps that Overlay the Percent Minority and Non-Minority Populations and Charts that Analyze the Impacts of the Distribution of State and Federal Funds.....	7
2.4	An Analysis of Impacts Identified in Section 2.3 .....	8
3.0	Direct Recipient Requirements.....	9
4.0	Primary Recipient Requirements .....	10
4.1	A Description of the Procedures the MPO Uses to Pass Through FTA Financial Assistance .....	10
4.2	A Description of the Procedures the MPO Uses to Provide Assistance to Potential Subrecipients .....	10
4.3	Monitoring Subrecipients.....	10



## 1.0 General Requirements

The Chicago Metropolitan Agency for Planning's (CMAP) Policy Committee is the northeastern Illinois metropolitan planning organization. As a subrecipient of federal funds, CMAP is required to submit a Title VI program to the Illinois Department of Transportation (IDOT). CMAP also serves as a primary recipient for a portion of federal funds that is awarded to transit providers and counties. The CMAP Board and its Policy Committee both approved the most recent program in June 2014.

The Federal Highway Administration (FHWA) and FTA completed a certification review in July 2014. This review contained no corrective actions or major recommendations. The review results found the agency to be in compliance with civil rights requirements.

FTA has not conducted a separate compliance review of CMAP's Title VI program.

### 1.1 Title VI Notice to the Public

The required notice to the public is posted on the CMAP website at <http://www.cmap.illinois.gov/contact-us/title-vi>. It is also included in Spanish at <http://www.cmap.illinois.gov/contact-us/titulo-vi>.

### 1.2 Instructions to the Public Regarding How to File a Title VI Discrimination Complaint

CMAP has designated an employee as the Civil Rights Officer for Title VI who has the responsibility for responding to all Title VI complaints. Instructions regarding how to file a complaint are posted to the CMAP website on the same page as the notice.

If a complaint is regarding one of the service providers within the MPO region, the complaint will be forwarded to the service provider for response. The Civil Rights Officer tracks the status of all complaints which have been forwarded to other organizations.

### 1.3 Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits

No Title VI investigations have been conducted, complaints filed or lawsuits initiated that name CMAP since the last Title VI Program was adopted in June 2014. There are no pending investigations, complaints or lawsuits from prior years.

### 1.4 Public Participation Plan

CMAP's [Public Participation Plan](#) was updated in January 2013. The plan outlines strategies CMAP uses to involve citizens including low income, minority and non-English speaking participants in the decision making process. The Citizens' Advisory Committee, Counties, and Council of Mayors structure, together with the CMAP working committees, and local technical assistance staff assure that information can be widely provided and gathered to effectively engage in outreach to various communities, including the traditionally underserved. CMAP staff continuously works to improve strategies to identify and gather communities for input, with the goal of reaching, engaging and sustaining relationships with these communities in the planning process.

Creating printed and electronic tools, hosting seminars, open houses, focus groups, press briefings and other meetings to educate the public at locations easily accessible to interested and affected persons and organizations is a fundamental feature of CMAP's engagement process. A customized set of tools are employed for each meeting to localize the planning process and to place the planning activities in local context.

### **1.5 Plan for Providing Language Assistance to Persons with Limited English Proficiency**

CMAP adopted its [Public Participation Plan](#) in January 2013. The purpose of the [Public Participation Plan](#) is to increase public awareness and participation while widening the range of voices and views in the planning process. As stated in the Plan, "Before CMAP begins any public engagement process, staff will work to develop a strategy document outlining the target audience and the steps that are needed to achieve the project goals." As part of the strategy, "CMAP will strive to accommodate the needs of traditionally underserved populations, such as low-income, minority, disabled, non-English-speaking, and other groups who have not previously participated in the planning process."

To assess the need for language assistance, CMAP has conducted a four-factor analysis, following the guidance in [Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient \(LEP\) Persons A Handbook for Public Transportation Providers](#), published April 13, 2007.

#### Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

CMAP is the comprehensive regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. By state and federal law, CMAP is responsible for producing the region's official, integrated plan for land use and transportation. The agency's innovative GO TO 2040 planning campaign develops and implements strategies to shape the region's transportation system and development patterns, while also addressing the natural environment, economic development, housing, education, human services, and other quality-of-life factors. CMAP is also the metropolitan planning organization for northeastern Illinois, maintaining the region's transportation improvement program. In this role, CMAP's planning activities also include Aux Sable and Goose Lake Townships in Grundy County and Sandwich and Somonauk Townships in DeKalb County.

As a planning agency, CMAP's encounters with LEP persons are relatively low. Outreach efforts specifically targeted to communities with higher proportions of minority or immigrant communities are the most likely times in which LEP persons will be encountered. As noted above, the [Public Participation Plan](#) calls for special efforts in these cases.



As a large metropolitan region, northeastern Illinois has a significant LEP population. Table 1 shows that the region as a whole includes 503,883 people 18 years old or over who speak English “not well” or “not at all.”

**Table 1. Population 18 and Over Who Speak English "Not Well" or "Not at All"**

Chicago city, Cook County, Illinois	217,548
Suburban Cook County, Illinois	141,133
DuPage County, Illinois	36,871
Kane County, Illinois	36,118
Kendall County, Illinois	2,085
Lake County, Illinois	32,524
McHenry County, Illinois	6,908
Will County, Illinois	20,696
Seven County Northeastern Illinois Region	503,883
Source: B16004, 2011-2015 American Community Survey 5-Year Estimates	

However, as Table 2 shows, when broken down by language and county within the region, the number of LEP persons is much less in any given part of the region. Since most CMAP activities occur at a subregional level corresponding to Council of Mayors councils, these data are more indicative of the potential level of exposure to LEP persons.

It should also be noted that CMAP has extremely limited contact with minors; while the data underlying table 1 exclude minors, the data for table 2 do not. In addition, the data for table 2 include people who speak English “well.” Thus, the figures in table 2, while based on the best current data available, overstate the number of LEP persons with whom CMAP may have contact.

As the table below shows, Spanish-speakers are by far the most common group with limited English proficiency with approximately 630,000 people out of the 7,828,000 in the region<sup>1</sup>, followed by Polish (85,000), Chinese (47,000) and Korean (22,000). All other languages have fewer than 20,000 LEP persons in the region.

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<sup>1</sup> Source: B01003, 2011-2015 American Community Survey 5-Year Estimates  
Title VI

**Table 2. Language Spoken at Home for Persons who Speak English Less than "Very Well" for Population 5 Years and Older**

	City of Chicago	Suburban Cook County	DuPage County	Kane County	Kendall County	Lake County	McHenry County	Will County	Seven County Region
African languages	5,708	1,404	362	228	90	33	77	349	8,251
Arabic	5,319	10,743	827	340	73	191	165	949	18,607
Armenian	185	464	0	0	0	20	0	0	669
Chinese	26,785	9,007	5,617	592	163	2,939	458	1,549	47,110
French (including Patois, Cajun)	2,663	1,439	318	113	133	305	112	306	5,389
French Creole	491	563	18	0	0	0	0	8	1,080
German	1,066	1,827	387	364	73	401	324	222	4,664
Greek	1,701	4,165	992	224	0	434	93	284	7,893
Gujarati	1,852	8,719	3,806	607	0	502	311	1,228	17,025
Hebrew	255	302	43	0	0	68	0	0	668
Hindi	2,062	3,834	1,554	291	0	446	95	323	8,605
Hmong	13	0	7	69	0	0	0	26	115
Hungarian	421	249	67	43	97	33	0	12	922
Italian	1,902	4,705	1,613	241	103	409	59	401	9,433
Japanese	1,177	3,082	286	13	5	485	17	71	5,136
Korean	3,684	12,095	1,565	306	76	2,705	317	875	21,623
Laotian	70	428	64	723	0	82	40	158	1,565
Mon-Khmer, Cambodian	523	470	323	237	0	77	0	142	1,772
Navajo	0	0	0	0	0	0	0	0	0
Persian	665	985	320	23	0	145	32	15	2,185
Polish	28,141	42,770	7,033	1,094	48	2,193	1,349	2,690	85,318
Portuguese or Portuguese Creole	520	322	170	57	0	80	5	24	1,178
Russian	3,901	9,756	880	280	6	3,913	69	62	18,867
Scandinavian languages	97	196	18	43	0	25	12	0	391
Serbo-Croatian	4,689	4,500	1,192	55	0	479	187	342	11,444
Spanish or Spanish Creole	271,553	160,455	38,776	62,314	4,238	47,693	10,753	34,133	629,915
Tagalog	6,773	8,564	2,466	1,499	53	1,562	316	1,155	22,388
Thai	1,447	803	242	118	152	212	0	135	3,109
Urdu	2,814	4,905	3,161	297	96	369	232	723	12,597
Vietnamese	4,089	2,105	2,091	329	146	321	201	542	9,824
Yiddish	18	67	0	0	0	16	0	0	101
Other and unspecified languages	17,387	25,029	9,538	1,824	198	2,539	483	2,684	59,682

Source: B16001, 2011-2015 American Community Survey 5-Year Estimates

### Factor 2: The Frequency with Which LEP Individuals Come into Contact with your programs, activities, and services

As noted previously, CMAP's encounters with LEP persons are relatively low. Most encounters are with local officials, professional staff, or representatives of community organizations.

Outreach efforts specifically targeted to communities with higher proportions of minority or immigrant communities are the most likely times in which LEP persons will be encountered. In such cases, the **Public Participation Plan** calls for special efforts to communicate with LEP persons. In particular, the Local Technical Assistance program assesses the specific outreach required in each project in conjunction with local community organizations.

### Factor 3: The Importance to LEP Persons of Your Program, Activities and Services

CMAP's services to the public are neither life-sustaining nor critical to the daily needs of people. Comprehensive regional and local planning, transportation planning and programming have significant long-term consequences, but their impacts are much smaller and less immediate to individuals in comparison to food, shelter, medical services, personal transportation, and similar services.

In cases in which CMAP needs to communicate with LEP persons, the communication does not require immediate action. Community meetings are organized well in advance. If there is a need for specific LEP services, there is adequate time to make special arrangements.

### Factor 4: The Resources Available to the Recipient and Costs

CMAP has staff specifically assigned to facilitate communication with Spanish-speakers; Spanish is by far the most common language spoken by LEP persons. Key CMAP documents such as the **long-range plan** are translated into Spanish and posted to the CMAP website.

## ***1.6 Racial Breakdown of the Membership of Committees, and a Description of Efforts Made to Encourage the Participation of Minorities on Such Committees***

Five boards and committees at CMAP consider transit-related issues in the course of their normal deliberations: the CMAP Board, the MPO Policy Committee, the Council of Mayors Executive Committee, the Transportation Committee and the CMAQ Project Selection Committee. Other committees and working groups may consider transit-related issues on an incidental basis.

Membership on these committees is specified in statutes or bylaws, in that the members are appointed to represent agencies or parts of the region. The members are appointed by others, so CMAP has no control over the appointments.

The appendix to the [Unified Work Program](#), updated annually, identifies minority membership on committees.

### ***1.7 Efforts the Primary Recipient Uses to Ensure Subrecipients are Complying***

RTA, CTA, Metra and Pace are direct recipients of FTA funds and report directly to FTA. CMAP will continue to work with these direct recipients and other subrecipients to ensure CMAP fulfills its responsibilities under federal regulations.

### ***1.8 Facility Construction***

This section does not apply to CMAP because the agency does not construct facilities.

## 2.0 MPO Requirements

### **2.1 Demographic Profile of the Metropolitan Area that Includes Identification of the Locations of Minority Populations in the Aggregate**

A demographic profile of the region, including identification of minority populations, is contained in the major capital project appendix of the [GO TO 2040 Plan Update](#). An analysis of the effects of regionally significant transportation projects on minority populations will be included in the region's next long range plan, [ON TO 2050](#).

### **2.2 Procedures by Which the Mobility Needs of Minority Populations are Identified and Considered within the Planning Process**

GO TO 2040, adopted in October 2010 and updated in October 2014, serves as the federally-recognized transportation plan for the region. GO TO 2040 addresses compliance with Title VI in several ways. First, an early step in plan development was the creation of the Regional Vision, which lays out the region's goals for 2040. This document includes vision statements in a number of areas, including equity. The language in the Regional Vision related to equity is as follows:

“The region will be strengthened by taking an active approach to equity. The benefits and burdens caused by the region's investments and policies will be fairly distributed to all parts of the region. In addition, these benefits and burdens will be shared between groups of people, regardless of age, gender, income, race, ethnicity, culture, religious beliefs, sexual orientation, or disability status. All residents will have the opportunity to access the region's economic, educational, housing, and other assets. Also, the diversity of the region's many cultures will be celebrated as one of our strengths.”

The GO TO 2040 plan also includes an introductory chapter titled “Challenges and Opportunities” which provides a framework for the plan's topical recommendations. This chapter describes the problems created by inequitable access to opportunity, recognizes that the region currently faces significant challenges in this area, and describes how these problems can be addressed by planning for a better balance of jobs and housing and also addressing education, workforce development, and health systems. These solutions are reflected throughout the recommendation chapters that make up the remainder of the plan.

### **2.3 Demographic Maps that Overlay the Percent Minority and Non-Minority Populations and Charts that Analyze the Impacts of the Distribution of State and Federal Funds**

As part of the major capital project evaluation process for GO TO 2040, environmental justice impacts were evaluated to demonstrate that the benefits of transportation investments are shared broadly in the CMAP region. This was done by examining the jobs-housing access measure for areas where median income is less than half the regional median income.

#### **2.4 An Analysis of Impacts Identified in Section 2.3**

The results of the environmental justice analysis demonstrate that job accessibility is improved, particularly in terms of transit. The method is documented in an appendix to the [GO TO 2040 Plan Update](#).

### **3.0 Direct Recipient Requirements**

CMAP is not a direct recipient of FTA funds, and hence is not subject to these requirements. CMAP is a subrecipient of the State of Illinois through the Illinois Department of Transportation.

## 4.0 Primary Recipient Requirements

### **4.1 A Description of the Procedures the MPO Uses to Pass Through FTA Financial Assistance**

The [Unified Work Program](#) web page describes the procedures CMAP uses to program UWP funds. Appendix H of the UWP document describes each year's process in more detail. The procedures are updated on an ongoing basis to meet the changing needs of the region and CMAP's partners.

### **4.2 A Description of the Procedures the MPO Uses to Provide Assistance to Potential Subrecipients**

As noted in the description of UWP programming procedures, MPO Policy Committee members either submit proposals, or sponsor submissions from other entities. MPO Policy Committee members have extensive experience with the requirements of federal funding processes; if required, CMAP staff will assist in communicating with the appropriate state and federal partners.

### **4.3 Monitoring Subrecipients**

The major subrecipients of UWP funds are the City of Chicago, CTA, Pace, Metra and the RTA. These agencies are direct recipients of FTA funds, and thus submit Title VI programs to the FTA.

Counties in the region also receive UWP funds to assist in the preparation of sub-regional transportation plans. CMAP will work with them to submit Title VI programs. They are required to submit quarterly reports on their projects.

CMAP's planning process incorporates Title VI considerations in the development of its transportation planning documents. CMAP works with its subrecipients through the committee structure to ensure that benefits of transportation investments are shared broadly in the CMAP region.