



Chicago Metropolitan  
Agency for Planning

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

**June 2014**



## **CMAP Board**

### **Executive Committee**

Gerald Bennett, chair

Rita Athas, vice chair

Elliott Hartstein, vice chair

Al Larson, at-large member

Raul Raymundo, at-large member

Rae Rupp Srch, at-large member

### **City of Chicago Appointments**

Rita Athas, senior advisor, World Business Chicago

Frank Beal, executive director, Metropolis Strategies

Lisa Laws, deputy chief operating officer, City of Chicago

Andrew Madigan, managing director, Mesirow Financial

Raul Raymundo, chief executive officer, Resurrection Project

### **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**

Roger Claar, mayor, Bolingbrook (Will)

Elliott Hartstein, former president, Buffalo Grove (Lake)

Rae Rupp Srch, former president, Villa Park (DuPage)

Carolyn Schofield, member, McHenry County Board (McHenry)

Thomas Weisner, mayor, Aurora (Kane/Kendall)

### **Non-voting Members**

Andre Ashmore, senior advisor to the director, Illinois Department of Commerce and Economic Opportunity (Governor's appointee)

Sean O'Shea, deputy chief of staff, Governor of the State of Illinois (Governor's appointee)

Leanne Redden, acting 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

Tom Cuculich, Chief of Staff, DuPage County

Christopher J. Lauzen, County Board Chairman, Kane County

John Shaw, County Board Chair, Kendall County

Aaron Lawlor, Vice Chair, County Board Chair, Lake County

Tina Hill, County Board Chair, McHenry County

Lawrence M. Walsh, County Executive, Will County

### **Regional Agencies**

Leanne Redden, Acting 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**

Ann Schneider, Chair, Secretary, Illinois Department of Transportation

Forrest E. Claypool, President, Chicago Transit Authority

John McCarthy, President, Continental Air Transport, Private Transportation Provider

Kristi Lafleur, Executive Director, Illinois State Toll Highway Authority

Don Orseno, Executive Director, Metra

Richard A. Kwasneski, Chairman of the Board, Pace

Wesley Lujan, 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

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# Chicago Metropolitan Agency for Planning

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June 2014

The Chicago Metropolitan Agency for Planning (CMAP) has established its Title VI Program pursuant to the Federal Transit Administration (FTA) Circular 4702.1B. The Program was adopted by the [CMAP Board](#) and [MPO Policy Committee](#) at their June 2014 meetings.

As a recipient of federal funds from the Federal Highway Administration and the Federal Transit Administration, CMAP complies with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation, Title 49, Code of Federal Regulations, Part 21.

A handwritten signature in blue ink, reading "Randall S. Blankenhorn", is written over a light blue horizontal line.

Randall S. Blankenhorn  
Executive Director





## 1.0 General Requirements

The Chicago Metropolitan Agency for Planning (CMAP) is the northeastern Illinois metropolitan planning organization. As a direct recipient of federal funds, CMAP is required to submit a Title VI program to the Federal Transit Administration (FTA). The most recent program was approved by the CMAP Board and MPO Policy Committee in June 2011.

The Federal Highway Administration (FHWA) and FTA completed a certification review in March 2010. This review contained no corrective actions or major recommendations. The most recent CMAP quadrennial certification review began in the summer of 2013 with a site visit in November 2013. 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 web site 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 2011. 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."

### **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**

Triennial reviews were conducted by FTA in 2013 for the City of Chicago, CTA, Pace and Metra. The reviews found these agencies to be in compliance with civil rights requirements. The most recent triennial review for the RTA in 2011 found the RTA to be in compliance with civil rights requirements; the 2014 review of the RTA is currently underway.

### **1.9 Facility Construction**

CMAP undertakes no construction projects, and thus does not perform fixed facility impact analyses. Individual Policy Committee member agencies are responsible for construction projects and to perform environmental assessments in compliance with FTA requirements. CMAP staff may be requested to assist in making these assessments.

## 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](#).

### **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, serves as the federally-recognized transportation plan for the region, although it covers more topics than a traditional long-range plan. GO TO 2040 addresses compliance with Title VI in several ways. The procedures by which minority population mobility needs are identified and considered are described in more detail in the appendices to the [Unified Work Program](#). The UWP discussion is updated annually to reflect CMAP's evolving planning processes; the FY 15 UWP includes discussion of planning processes for the GO TO 2040 Plan Update.

### **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 indicate that, as a class, the major capital projects do improve access to jobs by auto and transit for disadvantaged communities. While minority communities were not specifically broken out, income and minority status are closely correlated in the Chicago region. The method is documented in an appendix to the [GO TO 2040 Plan Update](#).

## **3.0 Direct Recipient Requirements**

### ***3.1 Fixed Route Public Transportation Service***

CMAP does not provide fixed-route public transportation service, and hence does not perform the service equity analysis required under Section 2 of Chapter IV of the Circular.

## 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**

Triennial reviews were conducted by FTA in 2013 for the City of Chicago, CTA, Pace and Metra. The reviews found these agencies to be in compliance with civil rights requirements. The most recent triennial review for the RTA in 2011 found the RTA to be in compliance with civil rights requirements; the 2014 review of the RTA is currently underway.

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.