



Triennial Report Title VI Program 2019 – 2022



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**CHICAGO TRANSIT AUTHORITY
TITLE VI PROGRAM
2019-2022 TRIENNIAL REPORT**

01 INTRODUCTION	6
02 GENERAL REQUIREMENTS	7
Title VI Notice to the Public	7
Title VI Complaint Procedures	7
Title VI Complaint Form	7
Title VI Complaints and Lawsuits	7
Public Participation Plan	7
Language Assistance Plan	9
Chicago Transit Board / ADA Advisory Committee Membership	38
Monitoring of Sub-Recipients	39
Documentation of Board Review and Approval of Title VI Program Triennial Report	39
03 SERVICE STANDARDS AND POLICIES.....	40
Overview and Objectives	40
Service Standards	40
Vehicle Load Standard	40
Vehicle Headway Standard	40
On-Time Performance Standard	41
Bus Network	41
Rail Network	41
Service Availability Standard	42
Service Policies	42
Transit Amenities Policy	42

Vehicle Assignment Policy	42
Key Route Bus Network Definition	43
Service Area Definition	43
Time Period Definitions	43
Distance Between Stops and Stations	43
04 MONITORING OF SERVICE STANDARDS AND POLICIES	44
Overview	44
Service Standards Monitoring.....	44
Vehicle Load Standard Monitoring	44
Bus Load Monitoring	44
Rail Load Monitoring	45
Vehicle Headway Monitoring	45
Bus Headway Monitoring	46
Rail Headway Monitoring and Findings	46
On-Time Performance Standard Monitoring	47
Bus On-time Performance Monitoring	47
Rail On-time Performance Monitoring	47
Service Availability Monitoring	48
Service Policies Monitoring.....	49
Transit Amenities Distribution	49
Vehicle Assignment Distribution	49
05 DEMOGRAPHIC ANALYSIS	51
Current Service Profile	51
Demographic Ridership and Fare Payment	51
Facilities	51

06 PUBLIC ENGAGEMENT PROCESS FOR MAJOR SERVICE CHANGE POLICY	52
07 SERVICE AND FARE EQUITY ANALYSES	52
Executive Summary	52
08 TITLE VI PROGRAM CONCLUSIONS / GOALS LOOKING HEAD.....	52

LIST of TABLES

Table 01: LEP Population: Ability to Speak English	11
Table 02: LEP Population: Language Spoken at Home	11
Table 03: LEP Population: Ability to Speak English by Language Category (number)	16
Table 04: LEP Population: Ability to Speak English by Language Category (percent share of total) ...	17
Table 05: LEP Population: Ability to Speak English by Citizenship Status (number)	17
Table 06: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)	18
Table 07: LEP Population: Linguistic Isolation by Language Category (number)	18
Table 08: LEP Population: Linguistic Isolation by Language Category (percent share in total).....	19
Table 09: UPDATED LEP Population: Ability to Speak English (Using Census Data 2016-2020)	25
Table 10: LEP Population Language Spoken at Home	25
Table 11: LEP Population: Ability to Speak English by Language Category (number)	27
Table 12: LEP Population: Ability to Speak English by Language Category (percent share of total)....	27
Table 13: LEP Population: Ability to Speak English by Citizenship Status (number)	27
Table 14: LEP Population: Ability to Speak English by Citizenship Status (percent share of total).....	28
Table 15: LEP Population: Linguistic Isolation by Language Category (number).....	28
Table 16: LEP Population: Linguistic Isolation by Language Category (percent share in total).....	28
Table 17: Customer Service Department Calls for Interpreter Service.....	30
Table 18: Title VI calls received by CTA’s Customer Service Department.....	37
Table 19: Chicago Transit Board and ADA Advisory Committee Membership.....	38
Table 20: Bus Load Monitoring	44
Table 21: Rail Load Monitoring	44
Table 22: Bus Scheduled Headway Monitoring.....	46
Table 23: Rail Scheduled Headway Monitoring	46
Table 24: Bus On-Time Performance Monitoring	47
Table 25: Rail On-Time Performance Monitoring	48
Table 26: Service Availability Monitoring	48
Table 27: Bus Vehicle Garage Assignment Monitoring (Average Age)	49
Table 28: Rail Vehicle Assignment Monitoring (Average Age)	49

FIGURES

Figure 1: Six County Region LEP Study Area and CTA Service Area 32
Figure 2: Linguistic Isolation by Language-Limited English-Speaking Households33
Figure 3: Linguistic Isolation by Language-Spanish.....34
Figure 4: Linguistic Isolation by Language-Indo European.....35
Figure 5: Linguistic Isolation by Language-Asian/Pacific Islander.....36

APPENDICES

Appendix A: Title VI Notice to the Public
Appendix B: Administrative Procedure 1602 and Online Title VI Policy
Appendix C: Title VI Complaint Form
Appendix D: Title VI Complaints and Lawsuits: 2019 - 2022
Appendix E: Previous Board Review and Approval of Title VI Program
Appendix F: Service Standards, Policies, and Operations
Appendix G: Transit Amenities Distribution
Appendix H: RTA Customer Satisfaction Survey
Appendix I: Recent, In Progress and Planned Facilities
Appendix J: Existing Facilities
Appendix K: Transit Trip Generators
Appendix L: Fare Equity Analysis – October 2021
Appendix M: Board Ordinance Approval for Fare Analysis 2023
Appendix N: Board Ordinance Title VI Program Triennial Report 2023

01 INTRODUCTION

The Chicago Transit Authority (CTA) is submitting this update of its Title VI program for years 2019, 2020, 2021 and 2022 in accordance with FTA Title VI Circular 4702.1B issued October 1, 2012. The documentation requirements of FTA Title VI Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, for years 2019, 2020, 2021, and 2022 have been followed and are available for review.

This report adheres to the Title VI Program Checklist as stated in FTA Title VI Circular 4702.1B which includes both General Requirements and Requirements of Transit Providers.

The CTA is committed to providing equal opportunity and service equity to its customers as protected by Title VI of the Civil Rights Act of 1964 ("Title VI"). This commitment means that the CTA does not discriminate on the basis of race, color, and national origin.

CTA submits a Title VI Program Triennial Report update every three years and reviews and monitors on a three-year cycle as stated in FTA Title VI Circular 4702.1B. Due to delays caused by the global COVID19 pandemic, data for operating year 2022 has been added to this year’s report.

02 GENERAL REQUIREMENTS

Title VI Notice to the Public

CTA posts its Title VI Notice to the Public on CTA's website at <http://www.transitchicago.com/about/title6.aspx>. Additionally, CTA has posted a notice in all of its vehicles both rail and bus, in all CTA rail stations, and in the lobby of CTA's headquarters. A sample of CTA's Title VI rail station notice can be found in Appendix A.

Title VI Complaint Procedures

CTA has developed a complaint procedure form for any person who believes she or he has been discriminated against on the basis of race, color, or national origin.

CTA's internal document, Administrative Procedure 1602 ("AP 1602"), addresses the procedure on how to file a Title VI complaint and provides detailed information on how CTA will process a complaint once it is received.

CTA's AP 1602 and online Title VI Policy can be found in Appendix B. The online Title VI Policy is also available to the public at <http://www.transitchicago.com/about/title6.aspx>.

Title VI Complaint Form

CTA's Title VI Complaint Form can be found in Appendix C and is also available online at <http://www.transitchicago.com/about/title6.aspx>.

Title VI Complaints and Lawsuits

CTA's Customer Service Department received an average of about 38,000 complaints annually or approximately 150,000 complaints during the reporting period 2019 - 2022. Title VI related complaints were routed from the Customer Service Department to CTA's EEO Unit. The complaint breakdown for Title VI Complaints are as follows: 2019 = 392, 2020 = 913, 2021 = 350, and 2022 = 327 for a total of 1,982 complaints received during this reporting period. Appendix D provides tracking logs of the complaints received during the reporting period 2019 - 2022.

In 2017, CTA created the position of Title VI Coordinator to handle and oversee the day-to-day operation of the Title VI Program. As part of this initiative, CTA also developed and implemented a formal Title VI complaint and investigation process, which has allowed us to centralize all Title VI complaint records. Specifically, the Title VI Coordinator is responsible for investigating, tracking, and monitoring all Title VI complaints and any action taken in response to investigation findings.

Public Participation Plan

A process for obtaining and considering public comment prior to a fare increase or service change has been established. This process is documented in Chapter 4, Section 57 of the CTA By-Laws, Rules and Regulations, and Rules of Order. These by-laws are distributed to all Chicago Transit Board members upon joining the Board and are one of the governing documents of the Chicago Transit Board. In addition, effective January 2004, the Chicago Transit Board provides the opportunity for public comments at every monthly meeting.

A service equity analysis will be conducted whenever the Authority implements a major service change to the rail or bus system, as defined in the Service and Fare Equity Policy and Analysis. A major service change to the rail or bus system is defined as the addition of, or reduction in, more than ten percent (10%) of the rail or bus system's riders or vehicle revenue hours through one or more route changes that would remain in effect in excess of twelve (12) months. The Chicago Transit Board considers public comment prior to making a final determination on the proposed service changes and/or fare increases. Public hearing requirements are set by ordinance, and state that a 14-day notice of intent to hold the public hearing is needed prior to the hearing.

Notice of the public hearing and description of the proposed service changes and/or fare increases are posted in various locations to provide an opportunity for elected officials, customers and concerned citizens to attend. The notice is posted in general and neighborhood-oriented newspapers, outside the Board office, on car cards on bus routes and rail lines affected, and on the CTA website. Elected officials are informed of the public hearing. A press release is also distributed. Information related to the public hearing is translated into the appropriate language(s) based on the composition of the targeted area. The most common languages translated are Spanish, Polish, and Chinese.

In addition to public hearings, there are other ways in which customers can provide feedback on fare and service changes. Customers can call 1-888-YOUR-CTA, email to feedback@transitchicago.com or write to the CTA c/o Customer Service Department or the Assistant Secretary of the Chicago Transit Board, 567 W. Lake St., Chicago, IL 60661, to document their concerns or feedback. A phone number is also designated for customers who are hearing impaired.

The different ways of contacting the CTA are posted on the website, throughout the bus and rail system, and printed on the CTA System Map and in advertising material. The Automatic Voice Announcement System (AVAS) on buses periodically mentions the CTA website and phone number. CTA previously aired a monthly television show, *Connections*, which provided information on CTA activities to educate and inform current and potential customers about CTA services. All episodes of *Connections* are now uploaded to CTA's YouTube page for customers to view. In addition, CTA publishes new content directly to YouTube including board meetings and other content such as real-time videos along the length of each rail line so that customers can take a virtual trip and know what to expect before taking their actual trip.

Customer input and feedback are vital to ensuring that CTA, as a public service, meets the needs of our customers. Comments received are taken into consideration as part of the recommendations presented to the Chicago Transit Board prior to a final determination regarding fare changes and/or service changes.

03 Language Assistance Plan

Introduction

CTA is committed to serving individuals who may require language assistance and supports the goals established by the Federal Transportation Administration (FTA) to provide meaningful access to its transit services. The LAP includes measures that are currently provided by CTA, as well as CTA's language assistance initiatives that are proposed for the future. The plan is based, in part, on an in-depth language study which was designed to reduce barriers to transit usage by individuals who may require language assistance.

Title VI requirements includes Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" and U.S. DOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons", CTA conducted its "Limited English Proficiency Study" ("LEP Study") in the summer of 2019.

Individuals who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English are characterized as limited English proficient, or "LEP." According to the 2000 U.S. Census, more than 10 million people reported that they do not speak English at all, or do not speak English well.

Public transit is a key means of achieving mobility for many LEP persons. The 2013-2017 U.S. Census also reported that more than 10 percent of LEP persons (ages 16 years and over) use public transit as their primary means of transportation to their place of employment. Comparatively, 5 percent of English speakers reported public transit as their primary means of transportation. Language assistance measures allow agencies to provide safe, reliable, convenient, and accessible services to LEP persons. These efforts attract riders who might otherwise be excluded from utilizing the service because of language barriers.

Background

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, and national origin under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disparate impact on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166 ("Order"), "Improving Access to Services for Persons with Limited English Proficiency," was issued on August 11, 2000. The Order directs each Federal agency that provides financial assistance to non-Federal entities to examine the services that they offer, and then to develop and implement a system that provides meaningful access to LEP persons for those services. President Bush affirmed his commitment to the Order through a memorandum issued on October 26, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. The memorandum directed Federal agencies to provide guidance and technical assistance to Federal funding recipients as to how they can make meaningful access to their services available to LEP persons.

Accordingly, the U.S. Department of Transportation (“DOT”) developed guidance for recipients and subsequently published a document, DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries (“DOT LEP Guidance”) on December 14, 2005. This document both clarifies the responsibilities of Federal funding recipients and provides guidance on best practices for serving LEP populations in accordance with statutory and regulatory requirements.

The DOT LEP Guidance recommends that all recipients, especially those serving large LEP populations, develop and implement a plan to address the needs of the LEP populations that they serve. According to the DOT LEP Guidance, an effective plan should cover the following five elements: 1) identifying LEP persons who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

The FTA references the DOT LEP Guidance in FTA C 4702.1B. Chapter III, Part 9 of the Title VI Circular reiterates the requirement to ensure meaningful access to benefits, services, and information for LEP persons. It also requires that Federal funding recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

Four-Factor Analysis

Based on the previous version of the Title VI Circular, CTA conducted the “Limited English Proficiency Study” (“LEP Study”) in 2019. The LEP Study used data from the 2013-2017 American Community Survey, which represents 3,488,072 households, 7,687,641 individuals, and 487,668 LEP persons for the 6-County Chicago metropolitan region (Cook, Du Page, Kane, Lake, McHenry, and Will). The purpose of the LEP Study was to collect data and conduct outreach efforts in order to identify the predominant languages spoken, determine the level of transit use, and identify whether or not LEP status presents an obstacle to transit use.

Geographically, the LEP Study accounted for Cook County, Illinois (“LEP Study Area”). The LEP Study analyzed the LEP groups that represented the highest language concentrations within the LEP Study Area: English, Spanish, Polish, and Chinese. The data garnered from the LEP Study helps to inform CTA’s language assistance decision making process in an ongoing manner with regards to four specific factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
- (2) The frequency with which LEP persons come into contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program to people’s lives; and
- (4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis¹. The following sources are used to evaluate this Factor:

2013-2017 Census Bureau’s American Community Survey

A primary data source identified in the FTA Handbook for the purposes of LEP Factor 1 analysis is the American Community Survey (“ACS”), a monthly survey conducted by the US Census Bureau. The following tables present data on the LEP population in the 938 census tracts, reflecting CTA’s service area. The top five languages spoken in Cook County are Spanish; Polish; Arabic; Filipino/Tagalog; and Chinese.

Table 1 presents data from the ACS on the entire population’s ability to speak English. The last column presents the data on the limited English proficient population that is the combined totals of those individuals who either do not speak English well or do not speak English at all. All data are limited to the population five years or older. For the population five years of age and older in the CTA service area, 8.1 percent are LEP and self-identify as speaking English less than well, which is shown in Table 1. While only 2.3 percent speak no English whatsoever, a much larger group comprehends some level of English but still struggles with communicating in English.

Table 1: LEP Population: Ability to Speak English

	Total	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Number	3,154,751	1,989,941	686,159	223,141	183,304	72,206	255,510
Percent	100.00%	63.1%	21.8%	7.1%	5.8%	2.3%	8.1%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 2 indicates the distribution of this population across the 106 non-English languages spoken in Cook County.

Table 2: LEP Population: Language Spoken at Home

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Spanish	1,012,544	58.7%	58.7%
Polish	139,275	8.1%	66.8%

¹ The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Arabic	49,659	2.9%	69.7%
Filipino, Tagalog	48,587	2.8%	72.5%
Chinese	38,119	2.2%	74.7%
Urdu	27,759	1.6%	76.3%
Russian	27,327	1.6%	77.9%
Korean	26,975	1.6%	79.5%
Gujarathi	25,295	1.5%	81.0%
Greek	22,460	1.3%	82.3%
Hindi	20,737	1.2%	83.5%
Italian	19,162	1.1%	84.6%
French	18,394	1.1%	85.6%
Cantonese	15,244	0.9%	86.5%
Niger-Congo regions (many subheads)	14,850	0.9%	87.4%
Ukrainian, Ruthenian, Little Russian	13,292	0.8%	88.2%
Rumanian	13,081	0.8%	88.9%
German	12,542	0.7%	89.7%
Vietnamese	11,157	0.6%	90.3%
Near East Arabic dialect	10,576	0.6%	90.9%
Serbian	8,955	0.5%	91.4%
Bulgarian	8,483	0.5%	91.9%
Malayalam	8,483	0.5%	92.4%
Mandarin	8,202	0.5%	92.9%
Telugu	8,052	0.5%	93.4%
Japanese	7,738	0.4%	93.8%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Bosnian	6,732	0.4%	94.2%
Lithuanian	6,553	0.4%	94.6%
Albanian	5,736	0.3%	94.9%
Tamil	5,509	0.3%	95.2%
Persian, Iranian, Farsi	5,082	0.3%	95.5%
Hebrew, Israeli	4,198	0.2%	95.8%
Thai	4,156	0.2%	96.0%
Turkish	3,829	0.2%	96.2%
French or Haitian Creole	3,751	0.2%	96.4%
Amharic, Ethiopian, etc.	3,543	0.2%	96.7%
Croatian	3,475	0.2%	96.9%
Bengali	3,396	0.2%	97.1%
Portuguese	3,057	0.2%	97.2%
Panjabi	2,756	0.2%	97.4%
Nepali	2,622	0.2%	97.5%
Pakistan nec	2,165	0.1%	97.7%
Mongolian	1,968	0.1%	97.8%
Czech	1,866	0.1%	97.9%
Magyar, Hungarian	1,792	0.1%	98.0%
Armenian	1,702	0.1%	98.1%
Marathi	1,699	0.1%	98.2%
India nec	1,623	0.1%	98.3%
Bantu (many subheads)	1,619	0.1%	98.4%
Dutch	1,502	0.1%	98.5%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Other specified African languages	1,481	0.1%	98.6%
Cushite, Beja, Somali	1,452	0.1%	98.6%
Mon-Khmer, Cambodian	1,419	0.1%	98.7%
Serbo-Croatian, Yugoslavian, Slavonian	1,401	0.1%	98.8%
Sebuano	1,147	0.1%	98.9%
Other Afro-Asiatic languages	1,109	0.1%	98.9%
Chinese, Cantonese, Min, Yueh	1,012	0.1%	99.0%
Kannada	971	0.1%	99.0%
Laotian	964	0.1%	99.1%
Swedish	944	0.1%	99.2%
Slovak	893	0.1%	99.2%
Irish Gaelic, Gaelic	863	0.1%	99.3%
Other Asian languages	839	0.0%	99.3%
Malay	753	0.0%	99.4%
Other Indo-Iranian languages	699	0.0%	99.4%
Other n.e.c.	697	0.0%	99.4%
Jamaican Creole	605	0.0%	99.5%
Yiddish, Jewish	605	0.0%	99.5%
Norwegian	596	0.0%	99.5%
Other Indo-European languages	592	0.0%	99.6%
Burmese, Lisu, Lolo	559	0.0%	99.6%
Lettish, Latvian	530	0.0%	99.6%
Karen	524	0.0%	99.7%
Macedonian	479	0.0%	99.7%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Swahili	463	0.0%	99.7%
Pashto, Afghan	401	0.0%	99.7%
Danish	340	0.0%	99.8%
Indonesian	337	0.0%	99.8%
Other specified American Indian language	327	0.0%	99.8%
Mande	316	0.0%	99.8%
Llocano, Hocano	306	0.0%	99.8%
Finnish	290	0.0%	99.9%
Nilo-Saharan, Fur, Songhai	284	0.0%	99.9%
Tibetan	248	0.0%	99.9%
Sinhalese	214	0.0%	99.9%
Afrikaans	203	0.0%	99.9%
Other English-based Creole languages	202	0.0%	99.9%
South/Central American Indian	192	0.0%	99.9%
Kurdish	174	0.0%	99.9%
Miao, Hmong	134	0.0%	100.0%
Swiss	133	0.0%	100.0%
Dari	115	0.0%	100.0%
Hawaiian	108	0.0%	100.0%
Aztecan, Nahuatl, Uto-Aztecan	100	0.0%	100.0%
Chin languages	81	0.0%	100.0%
Muskogean	53	0.0%	100.0%
Kiowa	45	0.0%	100.0%
Ojibwa, Chippewa	38	0.0%	100.0%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Dakota, Lakota, Nakota, Sioux	32	0.0%	100.0%
Tongan	29	0.0%	100.0%
Fulani	28	0.0%	100.0%
Other Malayan	25	0.0%	100.0%
Cherokee	23	0.0%	100.0%
Pennsylvania Dutch	14	0.0%	100.0%
Cape Verdean Creole	14	0.0%	100.0%
Lu Mien	12	0.0%	100.0%
Total	1,723,694	100.00%	

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 3: LEP Population: Ability to Speak English by Language Category (number)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	755,737	449,314	127,930	126,224	52,269	178,493
Indo-European	226,964	135,555	50,105	32,324	8,980	41,304
Asian/Pacific Islander	125,461	66,479	31,844	18,549	8,589	27,138
Other	56,648	34,811	13,262	6,207	2,368	8,575
Total	1,164,810	686,159	223,141	183,304	72,206	255,510

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 4: LEP Population: Ability to Speak English by Language Category (percent share of total)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	100.00%	59.5%	16.9%	16.7%	6.9%	23.6%
Indo-European	100.00%	59.7%	22.1%	14.2%	4.0%	18.2%
Asian/Pacific Islander	100.00%	53.0%	25.4%	14.8%	6.8%	21.6%
Other	100.00%	61.5%	23.4%	11.0%	4.2%	15.1%
Total	100.00%	58.9%	19.2%	15.7%	6.2%	21.9%

CHA analysis of American Community Survey data 2013-2017 5-year sample

In **Tables 5 and 6**, the data on ability to speak English are grouped by the respondent’s citizenship status.

Table 5: LEP Population: Ability to Speak English by Citizenship Status (number)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635
Naturalized Citizen	384,825	27,687	52,500	175,602	54,687	74,349	249,951
Not Citizen	3,154,751	1,989,941	449,314	306,423	236,845	172,228	478,651
Total	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635

Table 6: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	100.0%	78.8%	14.3%	2.5%	3.9%	0.5%	2.9%
Naturalized Citizen	100.0%	13.0%	14.5%	21.1%	25.8%	25.6%	46.7%
Not Citizen	100.0%	7.2%	13.6%	45.6%	14.2%	19.3%	65.0%
Total	100.0%	63.1%	14.2%	9.7%	7.5%	5.5%	15.2%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Tables 7 and 8 present data on the degree that a household is linguistically isolated. A linguistically isolated household is defined as a household where no one in the household 14 years or older speaks English only at home or no one in the household 14 years or older speaks English very well.

Table 7: LEP Population: Linguistic Isolation by Language Category (number)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	755,737	615,038	140,699
Indo-European	226,964	172,489	54,475
Asian/Pacific Islander	125,461	92,996	32,465
Other	56,648	43,126	13,522
Total	1,164,810	923,649	241,161

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 8: LEP Population: Linguistic Isolation by Language Category (percent share of total)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	100.0%	81.4%	18.6%
Indo-European	100.0%	76.0%	24.0%
Asian/Pacific Islander	100.0%	74.1%	25.9%
Other	100.0%	76.1%	23.9%
Total	100.0%	79.3%	20.7%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Factor 2: The frequency with which LEP individuals come in contact with the program

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis². The following sources are used to evaluate this Factor:

- **CTA Customer Facing Employee Interviews**
- **Group interviews with LEP stakeholder organizations**
- **CTA internal staff interviews**

48 customer facing bus and rail employees participated in 6 group interview meetings. The following topics were discussed and reviewed:

How often are you asked for assistance by LEP individuals?

What services are available to assist LEP riders?

Have you been asked to translate signage for LEP riders?

How often do LEP individuals ask you for directions?

How often do LEP individuals ask you for printed materials in their native language, *i.e.*, timetables?

How are assistance requests from LEP riders tracked?

Do you think the services for LEP riders are adequate, including in emergency situations?

What do you think are the biggest obstacles for LEP riders?

What suggestions do you have for improving access for LEP riders?

The following is a summary of common responses:

- Many reported interacting with LEP individuals on a regular basis. The frequency of how often a customer facing employee came in contact with an LEP individual depended on the route.
- Spanish and Polish speaking customers who did not speak English were the most common languages. This was followed by people who spoke a Chinese language.
- Three different groups of non-English speaking riders were identified: tourists, elderly non-English speaking persons and younger non-English speaking persons.

Additional Interviews with LEP Stakeholder Groups

CTA's LEP Consultancy firm, CHA interviewed LEP stakeholder groups that directly serve LEP customers. They researched stakeholder organizations representing populations speaking Spanish, Polish, Chinese, Korean, Russian, Arabic, Portuguese, Assyrian, Japanese, Thai, Vietnamese, Punjabi, Hindu, Farsi, other Indo-European Languages, and other Slavic languages.³ These organizations were invited to group interviews to share their experiences and make recommendations for improving access to CTA's services for their constituents.

² The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

³ CHA interviewed a total of 19 representatives from the following Community Stakeholder Groups:

1) Alivio Medical Center, 2) CALOR AHF Affiliate HIV Testing, 3) Central States SER, 4) Coalition for a Better Chinese American Community, 5) El Valor, El Rincon Family Services, 6) Family Focus, Howard Area Community Center, 7) Hana Center, Mexican Fine Arts Museum, North, 8) River Commission, Polish American Association, 9) El Hogar del Niño, Northwest Side Housing Center, 10) The Resurrection Project, Urhai Community Service Center.

Among the attendees at the LEP community stakeholder interviews were:

A representative from a qualified health center.

An executive director of a HIV & AIDs prevention center.

A manager for an employment services center.

The executive director of a faith, business and social service organization for the Chinese community.

A representative of a workforce development employment agency.

A representative of a mental health, substance use, re-entry, a recidivism reduction for youth center.

A representative from a center that provides job seeker training, counseling and English as a Second Language (“ESL”) services for the Korean community.

A coordinator from an economic development and housing agency that provides housing and education assistance.

An employee from the Polish American Association that provides adult education for employment, social services, counseling, and immigration services.

A case manager for a community organization that provides early childhood programs.

An employee from a community organization that provides immigration, health, and housing assistance.

A representative from a group that provides home care and assistance to the elderly in the Assyrian Community.

The executive director and founder of a community center offering homemaker services and Medicare Transportation.

A family services coordinator from a day care and social services agency.

A representative from a community organization for housing and organizing education.

The following topics were discussed and reviewed with Community Stakeholder representatives:

How do LEP individuals learn how to use the CTA system?

What are barriers to transit use the LEP individuals that you serve?

How do LEP individuals currently travel? What is their main mode of transportation?

- How do LEP individuals obtain information on various aspects of CTA communication? What is the importance of each of these: Line, station, and schedule information?
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ Emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ Public involvement processes
- CTA website

Effectiveness of CTA's current communications efforts

What resources do LEP individuals rely on for information on other public services?

How do LEP individuals file complaints? Do they know how to do so?

Which methods of communication do you feel would be most useful?

- Print materials in other languages
- Verbal communication in other languages
- Nonverbal communications (symbols, etc.)

CTA Internal Staff Interviews

CHA interviewed 11 CTA staff members from the following departments: Emergency Preparedness, Talent Acquisition, Planning and Scheduling, Diversity Business Enterprise, Recruiting, Title VI and Affirmative Action, Legislative Affairs, Compensation Planning, Service Planning, Revenue and Fare Systems.

The following topics were discussed and reviewed:

How do LEP individuals learn how to use CTA?

What barriers do CTA LEP riders face?

How do LEP individuals obtain information on various aspects of CTA?

- Line, station, and schedule information
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ public involvement processes
- CTA Title VI website

How do LEP individuals file complaints with CTA?

In-depth discussion and suggestions for improving LEP access to CTA.

Factor 3: The nature and importance of the program, activity or service provided by the recipient to people’s lives.

DOT LEP Guidance notes that providing public transportation access to LEP persons is crucial, as denial or delay of access to such services could have serious or even life-threatening implications for LEP populations. An LEP individual’s inability to utilize public transportation effectively may adversely affect her or his ability to access health care, education, or employment.

CTA recognizes the significance of transit services, and it is that consideration which underscores CTA’s commitment to accommodating LEP populations. CTA reviews survey data from a number of different perspectives and, on an ongoing basis, uses it to assess a variety of transit service provisions. Independent of language considerations, CTA sorts and monitors data relating to portions of the CTA Service Area that contain high concentrations of transit-dependent households. If a particular portion of the CTA Service Area has both a high concentration of a specific LEP group as well as a high percentage of transit-dependent households, then CTA considers those factors together when making translation service decisions.

CTA conducted an LEP study in 2019 to evaluate this Factor with these data sources:

- CTA Customer Facing Employee Interviews
- Group interview with LEP stakeholder organizations
- CTA Internal staff interviews
- Interview with Cubic/ Ventra call center staff

CTA Customer Facing Employee and LEP Stakeholder Organizations Interview Summary:

As described for Factor 2, 48 customer facing bus and rail employees were interviewed, along with nineteen LEP stakeholder organizations.

Employees reported that LEP individuals regularly use CTA rail and bus services. LEP stakeholder organizations report that LEP individuals frequently use CTA bus and rail services, and these services are important to their lives.

The 2019 LEP study underscores the importance of the CTA service to LEP communities and CTA’s commitment to serve LEP populations.

¹ The consulting firm Colette Holt and Associates (CHA) led the study also using American Community Survey data

Factor 4: Determine the resources available to the recipient and costs

CTA balances a variety of factors when making language assistance determinations. As a result of the LEP Study and other supplemental analyses, CTA has determined that, for system-wide projects, translation services will be provided as needed for the two LEP language populations with the highest percentages in the overall CTA Service Area. Currently, the most recently available survey data shows that those LEP populations are Spanish and Polish-speaking groups.

Non-system wide projects which affect only a specific and limited portion of the CTA Service Area are administered in a different manner. First, CTA derives a standard by calculating the total population located within the entire CTA Service Area. CTA then determines what percentage of that total population are LEP persons. Once established, that number serves as a benchmark (“LEP Benchmark”) to be used later in the analysis.

Then, CTA considers the specific populations likely to be impacted by the non-system wide project. To that end, adjacent census tracts that are within a quarter mile radius of the project site are identified (“Impacted Census Tracts”). CTA assesses the LEP group concentrations within the Impacted Census Tracts. If an LEP group concentration within an Impacted Census Tract meets or exceeds the threshold previously established as the LEP Benchmark, then CTA will provide translation services as needed.

In this manner, the standard by which individual census tracts are measured is set by a number that is derived from the sum total of all census tracts that comprise the CTA Service Area.

When using the most recently available survey data with this methodology, the analysis shows that 10.2 percent is the current LEP Benchmark. Spanish, Polish, and Chinese speaking LEP populations are the three language groups that either meet or exceed 10.2 percent in some of the CTA Service Area census tracts at this time. CTA balances the type and extent of translation service outreach to be provided with the resources available pursuant to the budget of each individual project.

The 2019 LEP Study evaluated this Factor. The study examined both interpretation and translation services at CTA both systemwide and at identified locations with high LEP populations. The Study identified opportunities to utilize available resources to serve LEP populations such as opportunities to provide translated signage.

UPDATED: LEP DATA using US Census Bureau American Community Survey 5-Year Estimates, 2016 - 2020

Table 9: LEP Population: Ability to Speak English

	Total	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (<Well)
Number	3,131,989	1,993,406	687,083	227,613	166,716	57,171	223,887
Percent	100.0%	63.6%	21.9%	7.3%	5.3%	1.8%	7.1%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 10: LEP Population: Language Spoken at Home

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Spanish	749,776	65.3%	65.3%
French	13,034	1.1%	66.4%
French Creole	2,757	0.2%	66.7%
Italian	11,073	1.0%	67.6%
Portuguese	2,454	0.2%	67.8%
German	9,172	0.8%	68.6%
Yiddish	913	0.1%	68.7%
West Germanic Languages	893	0.1%	68.8%
Scandinavian Languages	1,082	0.1%	68.9%
Greek	10,724	0.9%	69.8%
Russian	12,259	1.1%	70.9%
Polish	73,188	6.4%	77.3%
Serbian-Croatian	14,964	1.3%	78.6%
Other Slavic Languages	12,548	1.1%	79.7%
Armenian	866	0.1%	79.7%

Persian	2,722	0.2%	80.0%
Gujarati	7,545	0.7%	80.6%
Hindi	10,006	0.9%	81.5%
Urdu	14,654	1.3%	82.8%
Other Indic Languages	7,451	0.6%	83.4%
Other Indo-European Languages	17,101	1.5%	84.9%
Chinese	49,182	4.3%	89.2%
Japanese	3,410	0.3%	89.5%
Korean	12,391	1.1%	90.6%
Khmer	1,320	0.1%	90.7%
Hmong	86	0.0%	90.7%
Thai	3,146	0.3%	91.0%
Laotian	247	0.0%	91.0%
Vietnamese	8,069	0.7%	91.7%
Other Asian	10,412	0.9%	92.6%
Tagalog	30,031	2.6%	95.2%
Other Pacific Islander Languages	1,949	0.2%	95.4%
Other Native-American Languages	317	0.0%	95.4%
Hungarian	1,127	0.1%	95.5%
Arabic	20,667	1.8%	97.3%
Hebrew	3,208	0.3%	97.6%
African Languages	17,412	1.5%	99.1%
Other Unspecified	10,415	0.9%	100.0%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2015-2019

Table 11: LEP Population: Ability to Speak English by Language Category (Number)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	735,841	446,033	135,106	115,217	39,485	154,702
Indo-European	214,879	135,109	45,843	26,766	7,161	33,927
Asian/Pacific Islander	129,947	68,764	33,036	18,939	9,208	28,147
Other	57,916	37,177	13,628	5,794	1,317	7,111
Total	1,138,583	687,083	227,613	166,716	57,171	223,887

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 12: LEP Population: Ability to Speak English by Language Category (percent share of total)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	100.0%	60.6%	18.4%	15.7%	5.4%	21.0%
Indo-European	100.0%	62.9%	21.3%	12.5%	3.3%	15.8%
Asian/Pacific Islander	100.0%	52.9%	25.4%	14.6%	7.1%	21.7%
Other	100.0%	64.2%	23.5%	10.0%	2.3%	12.3%
Total	100.0%	60.3%	20.0%	14.6%	5.0%	19.7%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 13: LEP Population: Ability to Speak English by Citizenship Status (number)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	2,436,468	1,913,170	350,682	64,861	95,978	11,777	76,638
Naturalized Citizen	344,601	49,021	50,645	77,169	87,053	80,713	157,882
Non-Citizen	350,920	31,215	44,706	147,778	58,019	69,202	216,980
Total	3,131,989	1,993,406	446,033	289,808	241,050	161,692	451,500

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 14: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well
US-born Citizens	100.0%	78.5%	14.4%	2.7%	3.9%	0.5%
Naturalized Citizen	100.0%	14.2%	14.7%	22.4%	25.3%	23.4%
Non-Citizen	100.0%	8.9%	12.7%	42.1%	16.5%	19.7%
Total	100.0%	63.6%	14.2%	9.3%	7.7%	5.2%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 15: LEP Population: Linguistic Isolation by Language Category (number, households)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	261,697	207,100	54,597
Indo-European	109,564	82,263	27,301
Asian/Pacific Islander	59,724	43,191	16,533
Other	25,789	20,431	5,358
Total	456,774	352,985	103,789

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 16: LEP Population Linguistic Isolation by Language Category (percent share of total, households)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	100.0%	79.1%	20.9%
Indo-European	100.0%	75.1%	24.9%
Asian/Pacific Islander	100.0%	72.3%	27.7%
Other	100.0%	79.2%	20.8%
Total	100.0%	77.3%	22.7%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Additional Customer Outreach Efforts

Customer notices that are posted throughout CTA's transit system and this represents one example of an area that is experiencing improvements. These notices typically regard construction impacts, reroutes, or other service changes. CTA introduced new, redesigned, more easily understandable alerts that utilize mode icons, larger route numbers, and increased use of maps to augment text. These measures were designed to communicate information in a more simple, direct, and graphical manner for customers.

Some signage improvements and updates were made throughout the rail system in order to improve consistency and incorporate the colors of the rail lines. These measures make it easier for all customers to navigate the transit system during trips.

Signage standards were also revised to decrease the amount of text on signs, to place greater emphasis on proper names and terminals for navigation, and to greatly increase the use of symbols and icons for easier use and quicker cognition. These measures serve to decrease barriers for all passengers, including LEP persons. They are also representative of the types of actions that CTA takes, in addition to other studies, surveys, and analyses, in order to accommodate customers efficiently and effectively.

CTA continues to monitor the needs of LEP customers, evaluate feedback, and tailor services accordingly. Below is a sample list with some of the language assistance services that CTA provides.


CTA System Map: Each year, the CTA updates and publishes a translated System Map.

Overnight Service Brochure: A translated version of the "Night Owl" (overnight) service brochure is published.

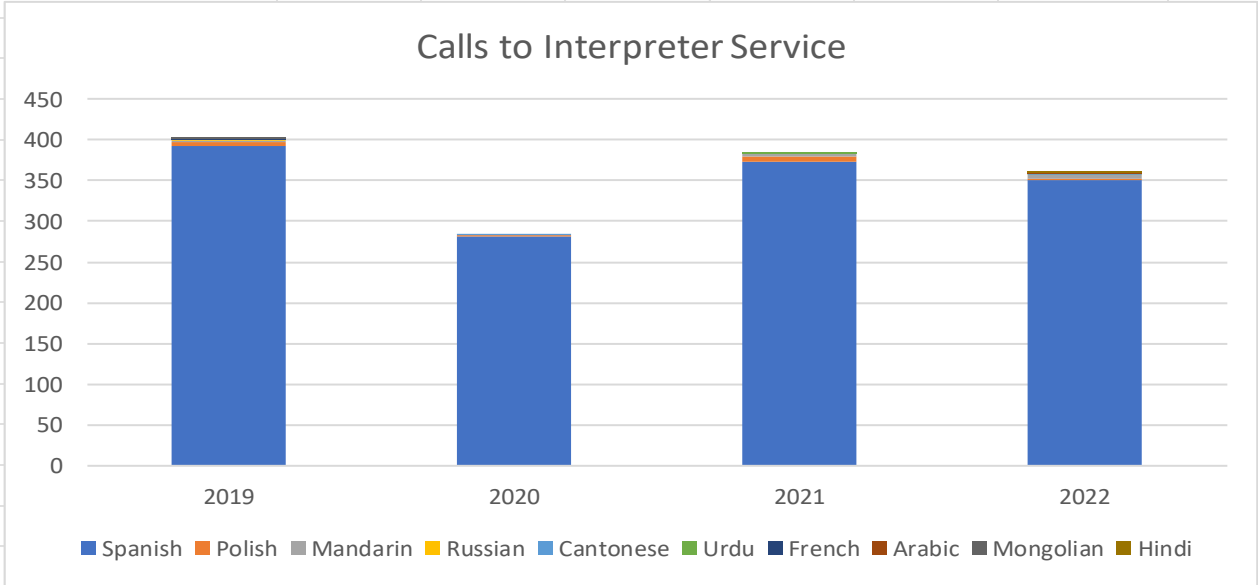
Customer Service: Bilingual Customer Service Representatives (Spanish) are available to customers via an immediate prompt through CTA's Customer Service Department at 1-888-YOUR-CTA. On-call translation services in approximately 170 languages are also available upon customer request. **Table 17** below represents the number of calls received during each of the respective reporting years and the languages for which interpreter services were requested.

Table 17: Customer Service Department Calls for Interpreter Service

Table 17: Customer Service Department Calls for Interpreter Service

		Customer Service Department Calls to Interpreter Service						
Language	2019	2020	2021	2022	Total	Percent		
Spanish	392	281	373	351	1397	97.5%		
Polish	5	2	7	1	15	1.0%		
Mandarin	2		3	5	10	0.7%		
Russian	1			1	2	0.1%		
Cantonese	1	1		1	3	0.2%		
Urdu			1		1	0.1%		
French	1				1	0.1%		
Arabic				1	1	0.1%		
Mongolian	1				1	0.1%		
Hindi				2	2	0.1%		
Total	403	284	384	362	1433	100%		

Calls to Interpreter Service



The chart displays the number of calls for interpreter services from 2019 to 2022. The y-axis represents the number of calls, ranging from 0 to 450. The x-axis shows the years 2019, 2020, 2021, and 2022. Each bar is stacked with colors representing different languages: Spanish (blue), Polish (orange), Mandarin (grey), Russian (yellow), Cantonese (light blue), Urdu (green), French (dark blue), Arabic (brown), Mongolian (dark grey), and Hindi (gold). Spanish consistently makes up the vast majority of calls, with a total of 1397 calls across all years. Other languages have very low call counts, with a total of 136 calls across all years.

Website Translation and Online Language Guides: CTA’s website has language guides for the three most commonly spoken LEP languages in the CTA Service Area: Spanish; Polish; and Chinese with links to Google Translate© for translation in additional languages.

Interpreters: Spanish, Polish, and Chinese speaking interpreters (as appropriate) are utilized at CTA community meetings and public hearings.

Customer Alerts and Notices: Translation services for items like customer alerts regarding public meetings, permanent route changes or discontinuations, or major temporary service changes may be provided depending on CTA's analysis of the language assistance needs of the affected census tracts.

Notice to LEP Persons Regarding Language Assistance Availability

CTA notifies LEP persons of its services through various means. CTA distributes and posts translated materials throughout the transit system as well as on the CTA website. CTA also distributes materials to elected officials' offices, libraries, and other community groups to spread awareness.

Next Steps

Through the 2019 LEP Study, CTA has identified additional opportunities to enhance communications with LEP persons, such as:

- 1) **Reviewing Title VI Notices at all bus and rail stations and providing translations where appropriate.**
- 2) **Continue Signage and Communication Improvements.**
As previously referenced, the Authority has begun the process of moving away from wordy signs. New signs will offer more pictures that provide information about directions, what to do in case of an emergency, while offering improved guidance to both English and LEP customers.
- 3) **Enhancing CTA's Title VI website to incorporate additional user friendly and LEP features.**
- 4) **Improvements to CTA's fare system (Ventra) for LEP persons.**
- 5) **Enhanced Support for Front-Line Employees.**
- 6) **Additional Engagement with LEP Community Stakeholders**

Monitoring and Oversight of Language Assistance Plan

CTA will continue to monitor, evaluate, and update the LAP based on the most recently available annual American Community Survey data for the CTA Service Area, multiple points of customer feedback, and additional ongoing customer service measures.

Specifically, since the overall LEP population within the CTA Service Area fluctuates, the data is updated with regularly. To that end, CTA uses the most recently available American Community Survey data to recalculate the LEP populations of each individual census tract. By its nature, this action reestablishes a new LEP Benchmark to be used for future language assistance decision making by CTA.

Figure 1:

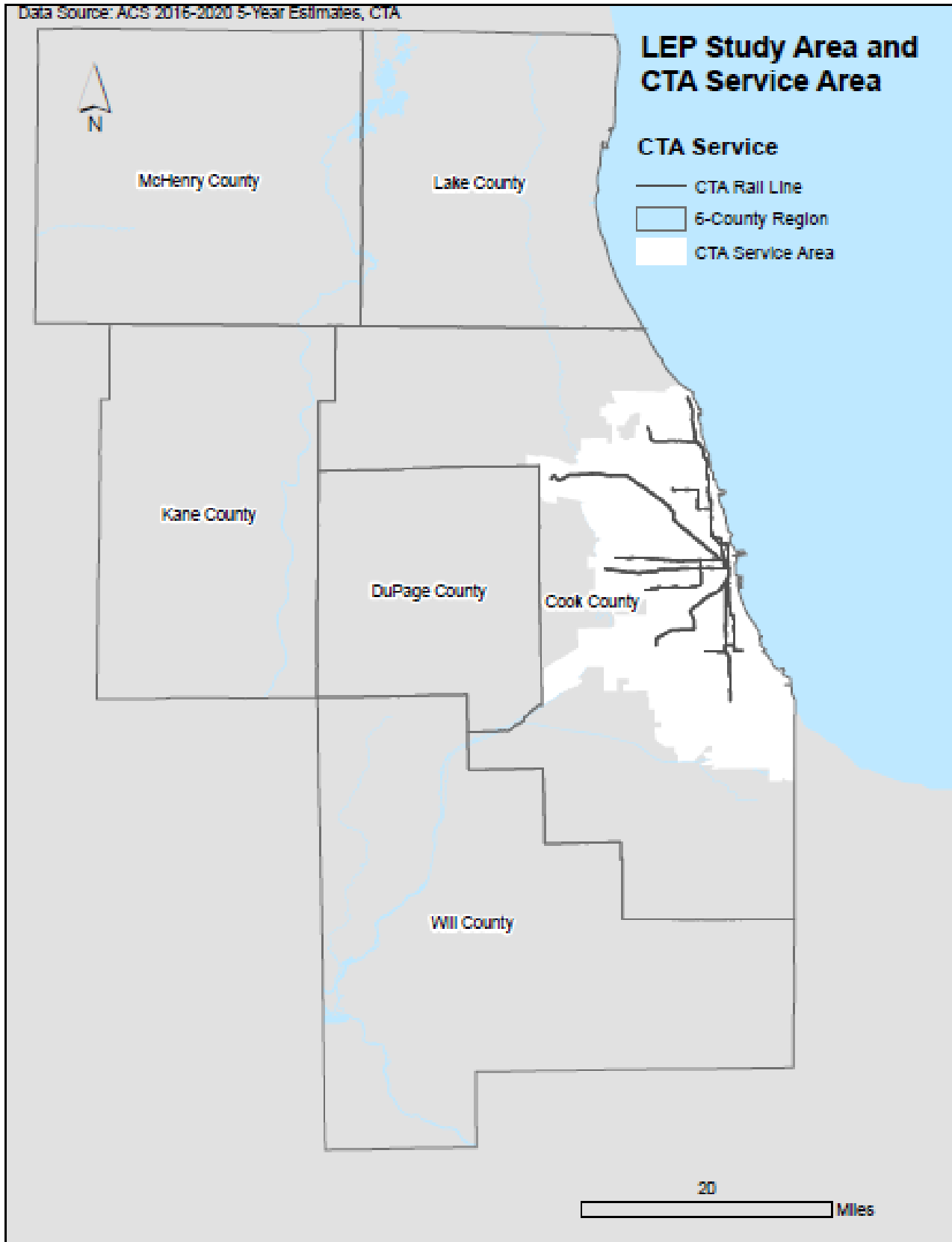


Figure 2:

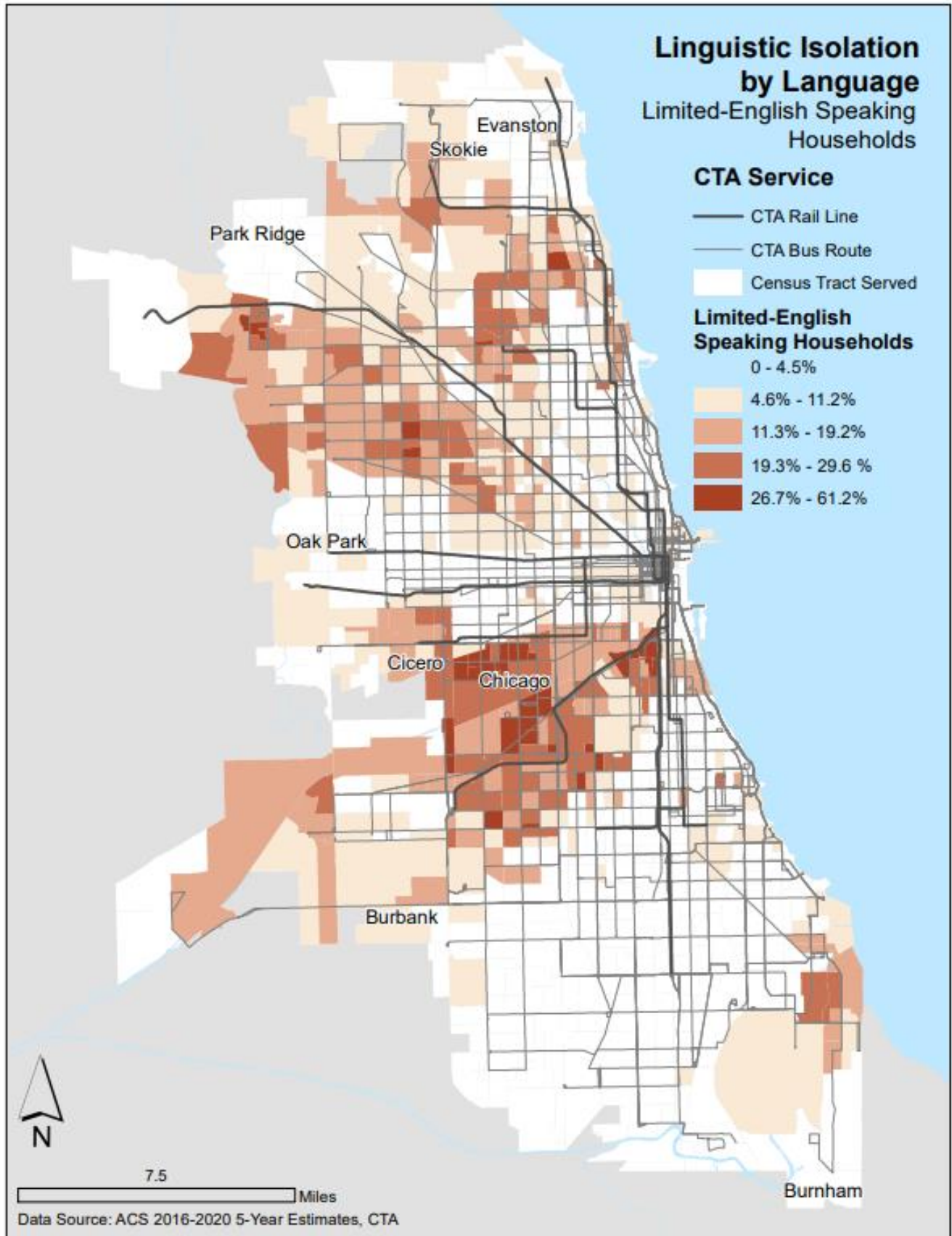


Figure 3:

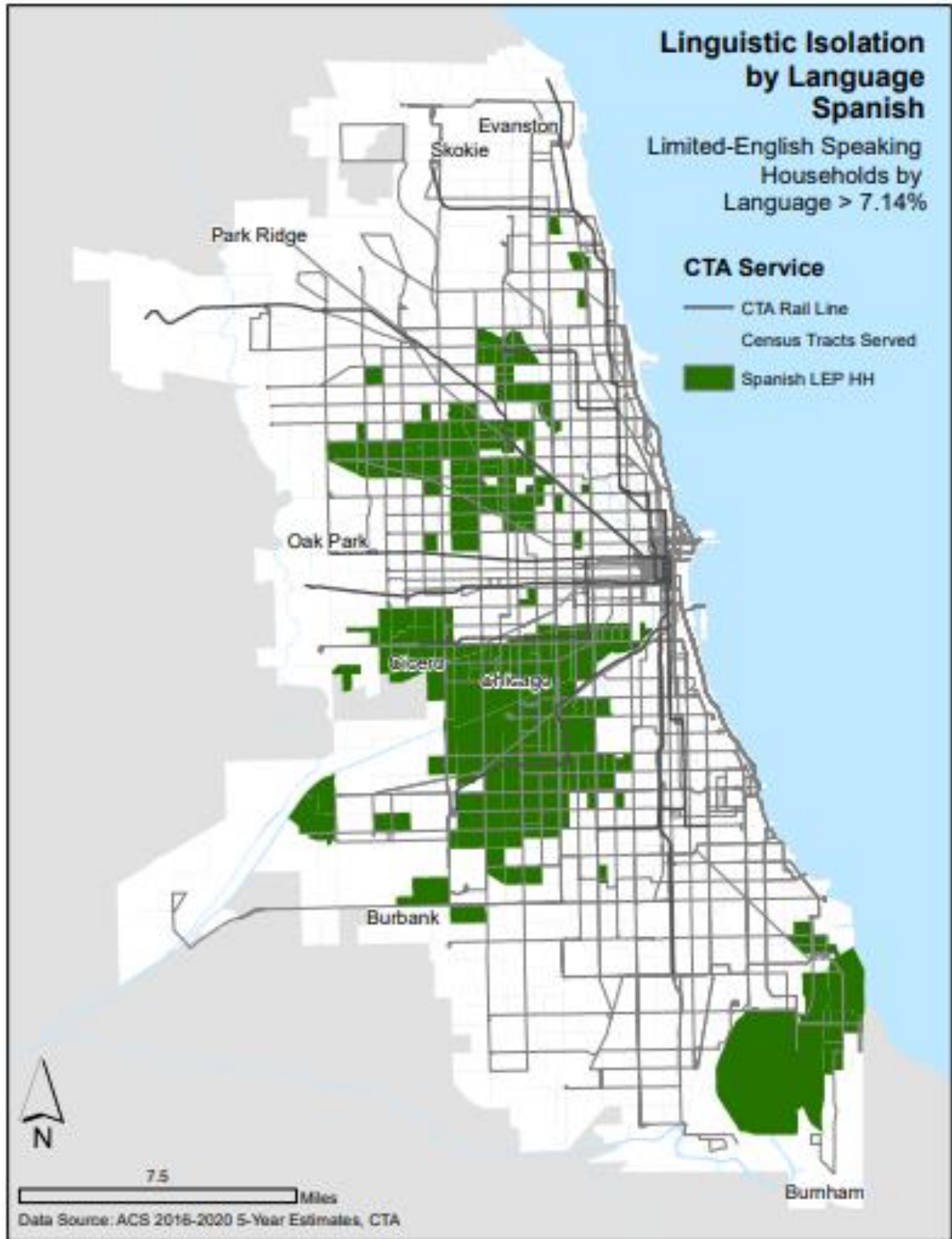


Figure 4:

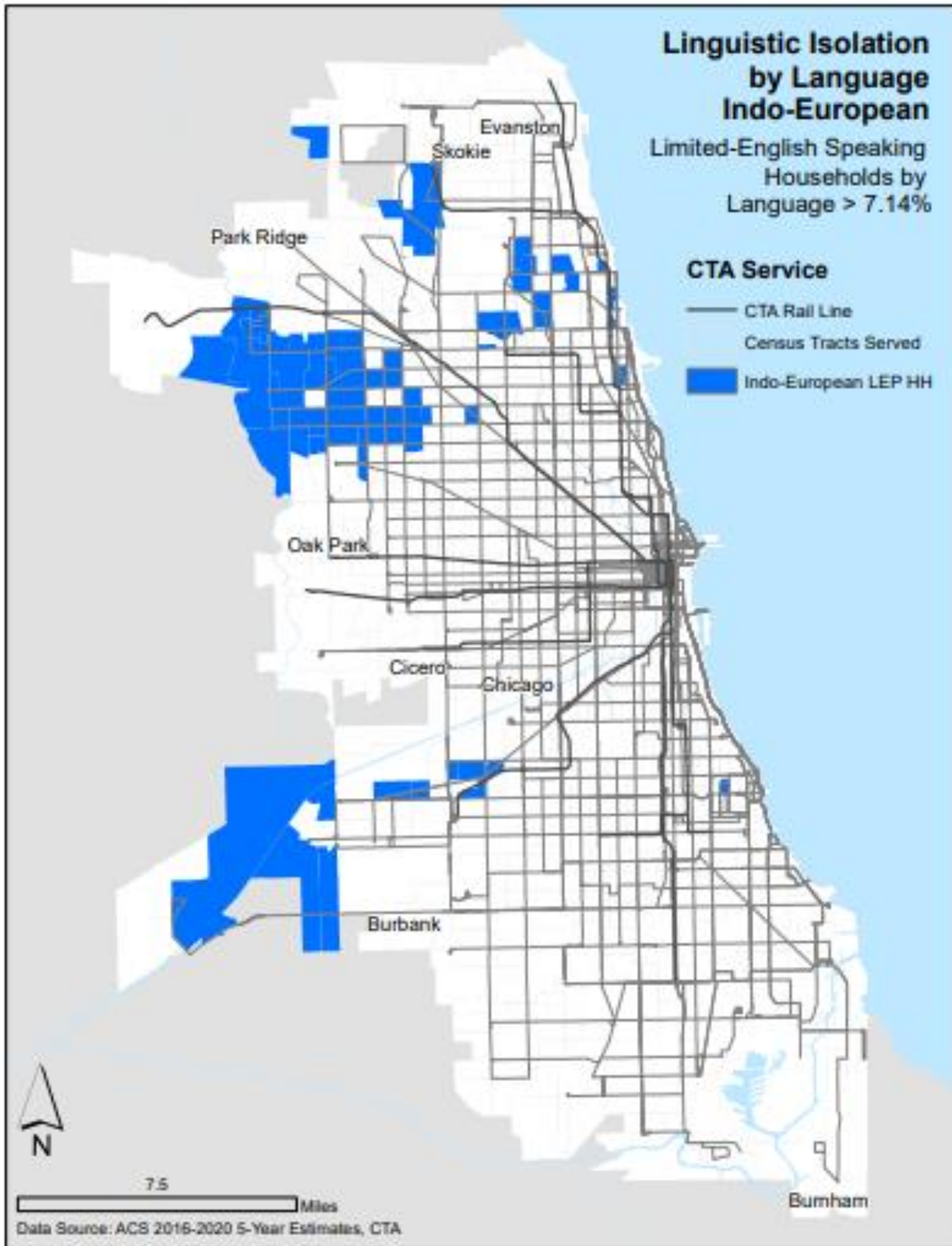
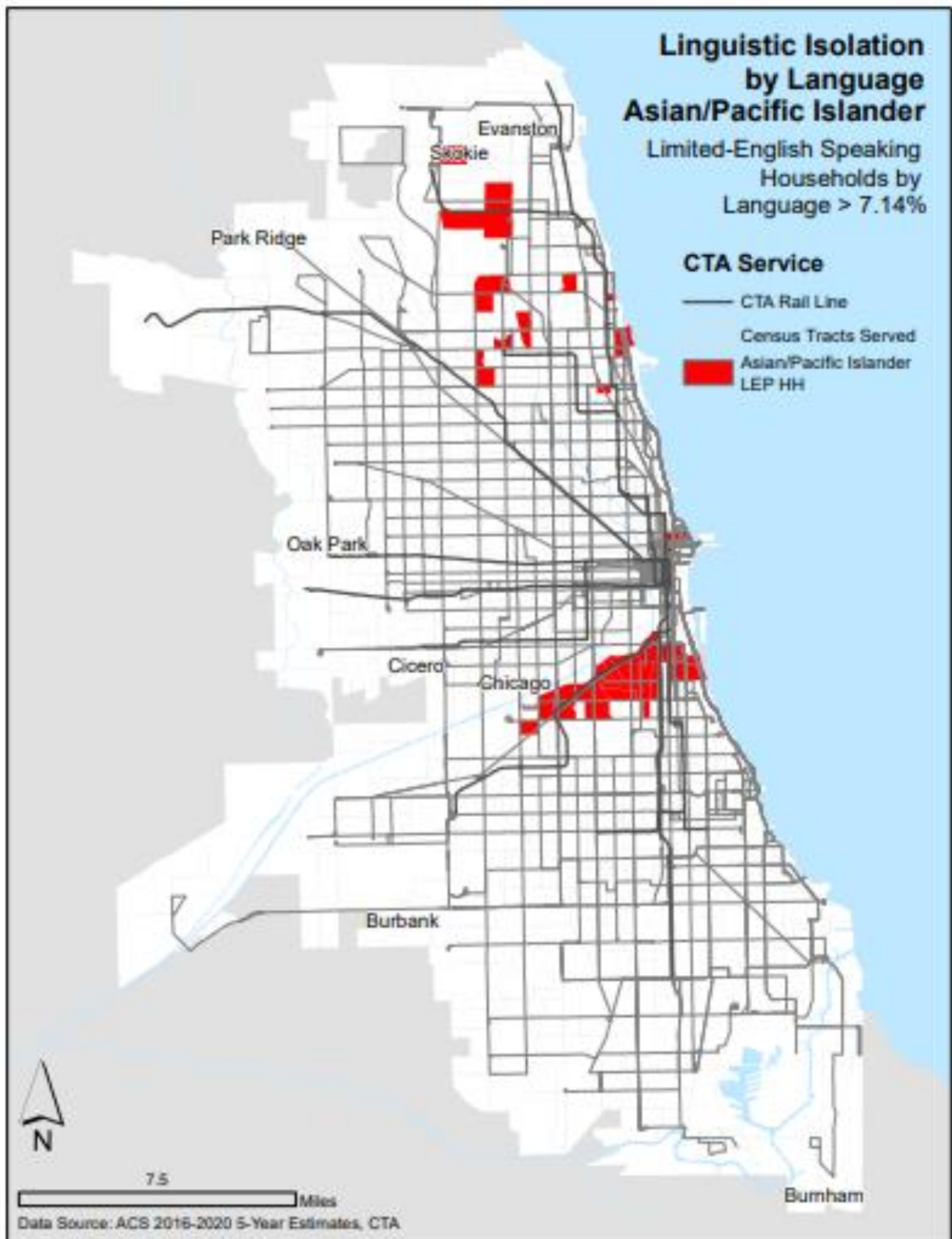


Figure 5:



Finally, all Title VI related calls are routed through CTA’s Customer Service Department’s call center, which also provides general CTA information, logs customer feedback and directs the information to the appropriate departments. Spanish speaking customer representatives are available and the Language Line Services has the ability to translate in approximately 170 languages for customers who request an interpreter. CTA established a Facebook page and a Twitter account and customers are encouraged to leave feedback on both of these social media sites. **Table 18** below shows the total number of Title VI calls received by CTA’s call center during the reporting years (2019 – 2022).

Table 18: Title VI calls during the reporting period received by CTA’s Customer Service Department

Table 18: Title VI calls during the reporting period received by CTA’s Customer Service Department



Customer Service Department
CSR-Reported Title VI Complaints

2019-2022

Type	2019	2020	2021	2022	Total
CTA ADA Violations/Issues	25	11	18	17	71
CTA Behavioral Complaints	193	791	123	122	1,229
CTA Claims	6	0	5	3	14
CTA Commendations	0	1	0	0	1
CTA Fare Systems	1	0	0	0	1
CTA General Maintenance	8	1	3	3	15
CTA Information Request	12	10	14	6	42
CTA Major Renovation	2	0	0	1	3
CTA Operational Complaints	6	7	3	2	18
CTA Procedural Complaints	69	58	68	51	246
CTA Schedule Violations	61	29	107	108	305
CTA Security Issues	7	4	7	13	31
CTA Service Change	1	1	0	0	2
CTA Vehicle Maintenance	1	0	2	1	4
Grand Total	392	913	350	327	1,982

Notes

* Includes complaints with the answer "yes" chosen for the question "Is this a Title VI Issue?"

* Answer is chosen at time of data entry by Customer Service Representative

* System does not require a yes or no answer (may be left blank)

**The number of behavioral complaints received in June 2020 received by one individual employee skewed that year's overall total*

Chicago Transit Board / ADA Advisory Committee Membership

The Chicago Transit Board consists of seven members, with four appointed by the Mayor of Chicago and three appointed by the Governor of Illinois. The Mayor's appointees are subject to the approval of the Governor and the Chicago City Council. The Governor's appointees are subject to the approval of the Mayor and the Illinois State Senate. The ADA Advisory Committee was established by the authority of the Chicago Transit Board. It serves in an advisory capacity to the CTA. Its purpose is to provide the CTA with recommendations on CTA's compliance with the Americans with Disabilities Act (ADA), facilitate a dialogue between CTA and the disability community, and increase the use of CTA's services by people with disabilities.

The ADA Advisory Committee consists of up to 12 members and is chosen from qualified applicants by the Chairman of the Chicago Transit Board, based on their ability to represent a cross section of the community of people with disabilities in the Chicago metropolitan area. Efforts are made to encourage minority representation in these two planning and advisory bodies.

Table 19 below displays the membership of the Chicago Transit Board and ADA Advisory Committee as of December 2022 and is broken down by race and compared to the population of CTA's service area.

Table 19: Chicago Transit Board and ADA Advisory Committee Membership

Chicago Transit Board and ADA Advisory Committee Membership								
Board	# Of Members	Vacant	White	Black	Hispanic	Asian	AI/AN	Other
CTA Service Area Population	3,336,473		37%	25%	28%	7%	0.8%	0.3%
Chicago Transit Board	7	14%	0%	43%	29%	29%	0%	0%
ADA Advisory Committee	12	17%	67%	17%	0%	0%	0%	0%

Table 19: Chicago Transit Board and ADA Advisory Committee Membership

CTA Transit Board Members

Lester L. Barclay appointed by Mayor, Expiration: September 2027, Michele A. Lee, Appointed by Mayor, Expiration: September 2028, Rosa Y. Ortiz, Appointed by Governor, Expiration: August 2028, Rev. Johnny L. Miller, Appointed by Mayor, Expiration: September 2021, Rev. Dr. L. Bernard Jakes, Appointed by Governor Expiration: August 2025 and Neema Jha, Appointed by Governor, Expiration: August 2023.

ADA Advisory Committee

Whitney Hill (Chair), Mary Abramson, Doreen Bogus, Robin A. Jones, Michael L. Kiser, Nicholas S. Robertson, Cynthia Fosco, Sara Luna, Barbara Padilla, and Laura Saltzman

Monitoring of Sub-Recipients

During this reporting period CTA does not have any sub-recipients and is not required to monitor for compliance with Title VI regulations.

Documentation of Board Review and Approval of Title VI Program Triennial Report

In accordance with FTA Title VI Circular 4702.1B, CTA takes its Title VI Program Triennial Report to the Chicago Transit Board for approval. A copy of the 2023 Ordinance approving CTA's 2019-2022 Title VI program can be found in Appendix E.



Chicago Transit Authority

Service Standards and Policies

Revised May 2023

Overview and objectives

The Chicago Transit Authority (CTA) has revised its Service Standards and Policies in accordance with Federal Transit Administration (FTA) circular 4702.1B regarding requirements and guidelines for compliance with Title VI of the Civil Rights Act of 1964 (Title VI).

These standards and policies address how service is distributed across the transit system and ensure that the manner of the distribution affords users access to these assets. CTA regularly monitors its adherence to these standards and policies and will report to the FTA on its adherence as it relates to Title VI every three years as required by the circular.

Service standards

This document sets service standards for vehicle load, vehicle headway, on-time performance and service availability for both the bus and rail networks.

Vehicle load standard

The vehicle load standard is used to determine if buses and trains are overcrowded. The load standard is 53 passengers per bus for the 40-foot bus fleet, 79 passengers per bus for 60-foot bus fleet and 80 passengers per car for the rail fleet.

Loads are measured at the most crowded point on all bus routes and rail lines by half-hour period and compared against the load standard. The load standards are not the maximum capacity of the given vehicle types, rather they are set at levels that provide a reasonable amount of comfort for customers on their daily commutes. Any routes and time periods that exceed these standards on a regular basis should be targeted for improved service.

Loads are reported for the bus fleet using Automatic Passenger Counter technology, which counts how many passengers enter and exit the buses at each stop and calculates the resulting loads. Loads are reported for the rail fleet using the CTA's Rail Origin-Destination model, which estimates loads based on fare card entries into the rail system.

Vehicle headway standard

Vehicle headway is defined as the amount of time between two vehicles traveling in the same

direction on a given line or combination of lines.

The standard for maximum vehicle headway on both the bus and rail networks is to operate 30 minutes or better at all times of the day.

In addition to this system-wide maximum headway, CTA has vehicle headway standards covering the more heavily ridden time periods on the Key Route bus network and the rail network.

The Key Route bus network was established to ensure that customers across the more densely populated parts of the service area with high transit usage can readily access bus routes meeting more stringent frequency standards. Routes in the Key Route network are typically spaced one mile apart, which allows for approximately a 1/2-mile journey to reach a route in this network. The Key Route bus network and the service area are defined in the Appendix F.

The vehicle headway standard for the Key Route bus network is to operate at least every 10 minutes during the weekday peak periods, 15 minutes during the weekday midday period, 20 minutes during the weekday evening period, 15 minutes on Saturday afternoons and 20 minutes on Sunday afternoons. These time periods are defined in the Appendix F.

The vehicle headway standard for the rail network is to operate at least every 10 minutes during the weekday peak periods, 15 minutes during the weekday midday and evening periods and 15 minutes on Saturday and Sunday afternoons.

Service operates more frequently than the headway standards based on ridership demand and meeting the vehicle load standards.

Minor exceptions to all headway standards are permitted for the purposes of scheduling practicality and improved efficiency.

On-time performance standard

CTA's on-time performance standard includes criteria for when a bus or train is considered on time and a threshold of acceptable performance in meeting these criteria.

Bus network

A bus is considered to be on time if it is no more than one minute early and no more than five minutes late. CTA's goal is to have 65% of customers on every route be able to board on-time buses.

Rail network

For the rail network, on-time performance is based on meeting the scheduled headway rather than meeting specific arrival or departure times. For service scheduled to operate more frequently than every ten minutes, a train is considered on time if the actual headway of that trip is between one-half and one-and-a-half times the scheduled headway. For service operating every ten minutes and less frequently, a train is considered on time if the actual headway is within 5 minutes of the scheduled headway. CTA's goal is to have 85% of customers on every line be able to board an on-time train.

The method of monitoring rail on-time performance based on scheduled headway is used because headway adherence data is more readily available for the rail network than schedule adherence data, allowing for more complete monitoring and reporting. Maintaining scheduled headways ensures that customers are receiving scheduled service levels.

For bus routes and rail lines not meeting these thresholds, attention will be focused on improving reliability on more heavily ridden routes first in order to ensure CTA's resources are focused on maintaining scheduled service levels in a way that benefits the most customers possible.

Service availability standard

The service availability standard is based on customer travel distances to reach transit. Customers throughout the service area should be able to travel a half mile or less to reach the nearest transit service.

Service policies

This document sets service policies for the distribution of transit amenities and vehicle assignment for both the bus and rail systems.

Transit amenities policy

Printed station signage is provided at every rail station indicating the station name and the rail line(s) serving the station. Timetables, a bus and rail system map and digital next train signage are placed at every station.

Printed signage is provided at every bus stop indicating the route(s) serving the stop, route destination, days of operation and basic span-of-service information.

Installation of other transit amenities including seating, waste receptacles, rail shelters and platform canopies, escalators and elevators are based on the number of passenger boardings at the given stop or station.

The CTA does not have decision-making authority over the siting of bus shelters as this program is managed by the City of Chicago. For this reason, there is no service policy regarding the siting of bus shelters.

Vehicle assignment policy

Vehicle assignment refers to the process by which transit vehicles are placed into service at bus garages and rail lines throughout CTA's system.

CTA's fleet consists of rail cars, 40-foot buses and 60-foot buses, all of which are air-conditioned and accessible. All buses are low-floor, equipped with bike racks and make voice and text announcements for all bus stops through the Automated Vehicle Announcement System. All rail cars make automated voice announcements for all stations.

CTA's vehicle assignment policy is to allocate the 40-foot and 60-foot bus fleet based on ridership and to maintain a uniform vehicle age by fleet size across all garages in the system. On the rail network the policy is to maintain a uniform fleet age across all rail lines.

Key Route bus network definition

The Key Route bus network was established to ensure that customers across the more densely populated parts of the service area with high transit usage can readily access bus routes meeting more stringent frequency standards. Routes in the Key Route network are typically spaced one mile apart, which allows for approximately a one-half mile journey to reach a route in this network.

Key Routes				
4/X4 Cottage Grove	29 State	54B South Cicero	77 Belmont	95 95th
8 Halsted	34 South Michigan	55 Garfield	79 79th	119 Michigan/119th
8A South Halsted	35 31st/35th	60 Blue Island/26th	80 Irving Park	151 Sheridan
9/X9 Ashland	47 47th	62 Archer	81 Lawrence	155 Devon
12 Roosevelt	49/X49 Western	63 63rd	82 Kimball-Homan	
J14 Jeffery Jump	49B North Western	66 Chicago	84 Peterson	
20 Madison	52 Kedzie	67 67th-69th-71st	85 Central	
21 Cermak	53 Pulaski	71 71st/South Shore	87 87th	
22 Clark	53A South Pulaski	72 North	90 Harlem	
28 Stony Island	54 Cicero	74 Fullerton	91 Austin	

Service area definition

The service area is defined by the area covered by all census blocks within a half mile of a CTA bus route or rail station as well as all census blocks completely surrounded by these blocks.

Time period definitions

AM Peak: 6 am to 9 am

Midday: 9 am to 3 pm

PM Peak: 3 pm to 7 pm

Evening: 7 pm to 10 pm

Saturday and Sunday afternoon: 12 pm to 6 pm

Distance between stops and stations

The ideal bus stop spacing on most routes is approximately every one-eighth to one-quarter mile, or 660 – 1,320 feet. One-eighth-mile spacing is sought in order to maintain neighborhood connectivity to a route. Wider spacing of up to one-quarter mile can be used in areas with very low ridership, poor pedestrian access or in cases where operating conditions, such as traffic congestion, are such that the customer base will be better served with less frequent stopping patterns. On routes where CTA is moving a large number of customers over a long distance, stops can be spaced every half mile, or 2,640 feet.

Bus stops are generally located at intersections. At signalized intersections the preference is for far side stops, meaning the bus stops after passing through the intersection. At uncontrolled intersections and intersections with stop signs the preference is for nearside stops, meaning the bus stops before passing through the intersection.

Rail stations are ideally spaced a half mile to one and one-half miles apart. Stations may be spaced farther apart or closer together based on demand, density, and connections to the bus system.

04 MONITORING OF SERVICE STANDARDS AND POLICIES

Overview

Operating the nation’s second-largest public transportation system, CTA monitors the performance of the bus network and rail system every three years using the CTA Service Standards and Policies to ensure the end result of policies and decision-making is equitable.

Vehicle Load and Headway, On-time Performance, and Service Availability of both minority and non-minority bus routes and rail branches are assessed by comparing service provision to the established CTA service standards as directed in FTA Title VI Circular 4702.1B. The U.S. Census Bureau, 2016-2020 American Community Survey 5-year Estimates, is used to classify the census tracts within the CTA Service area as either minority or non-minority. A tract is defined as a minority census tract when the percentage of the tract that is minority is equal to or greater than the average found in the service area. The average minority percentage in the service area is 63.1%. A bus route or rail branch is identified as minority if more than 33% of the roundtrip distance of the route or branch goes through census tracts defined as minority.

Distribution of Transit Amenities and Vehicle Assignments of both minority and non-minority bus routes and rail lines are assessed by comparing amenities provided and vehicles assigned to the established CTA service policies as directed in FTA Title VI Circular 4702.1B.

Service Standards Monitoring

Vehicle Load Standard Monitoring

Passenger loading levels of minority and non-minority bus routes and rail branches were analyzed during years 2019, 2020, 2021, and 2022 to determine compliance with the CTA service standards.

Bus Load Monitoring

CTA continually monitors loading levels and makes regular adjustments to bus service four times a year to address service-related issues. In order to address crowding, 72 service-related improvements were made to the bus network during years 2019, 2020, 2021, and 2022.

Table 20 below displays the proportion of bus customers experiencing loading levels that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 20: Bus Load Monitoring

BUS LOAD MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
<i>FALL 2019</i>	98.3%	1.7%	90.1%	9.9%	-8.2%
<i>FALL 2020</i>	100.0%	0.0%	100.0%	0.0%	0.0%
<i>FALL 2021</i>	100.0%	0.0%	99.1	0.9%	-0.9%
<i>FALL 2022</i>	99.3%	0.7%	95.7%	4.3%	-3.6%

Table 20: Bus Load Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority classified routes than customers on non-minority classified routes.

Findings

Based on the table above, bus riders on minority-classified routes were not disparately impacted during years 2019, 2020, 2021, and 2022 . Before the COVID-19 Pandemic, loads on both minority and non-minority bus routes were within the standards 90-98% of the time. The pandemic resulted in riders on both minority and non-minority classified routes experiencing loads within the standards approximately 100% of the time. A disparate impact occurs if the percentage of riders on minority classified routes not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority classified routes not meeting the standard.

Rail Load Monitoring

CTA continuously monitors service levels and makes regular adjustments to rail service twice per year to address any service-related issues, including crowding. When and where such issues occur, rail service is adjusted in accordance with ridership data.

Table 21 below displays the proportion of rail customers experiencing loading levels on minority and non-minority classified branches that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 21: Rail Load Monitoring

RAIL LOAD MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
<i>FALL 2019</i>	95.5%	4.5%	84.7%	15.3%	-10.8%
<i>FALL 2020</i>	100.0%	0.0%	100.0%	0.0%	0.0%
<i>FALL 2021</i>	100.0%	0.0%	99.8%	0.2%	-0.2%
<i>FALL 2022</i>	100.0%	0.0%	99.2%	0.8%	-0.8%

Table 21: Rail Load Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority classified branches than customers on non-minority classified branches.

Findings

Based on the table above, rail riders on minority classified branches were not disparately impacted during the years 2019, 2020, 2021, and 2022. A disparate impact occurs if the percentage of riders on minority classified branches not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority routes not meeting the standard.

Vehicle Headway Standard Monitoring

Vehicle headway levels of both minority and non-minority bus routes and rail branches were analyzed during years 2019, 2020, 2021, and 2022 in order to determine compliance with the CTA service standards.

CTA manages service by balancing appropriate crowding levels while maintaining minimum scheduled headways.

Bus Headway Monitoring

Table 22 below displays the proportion of customers on minority classified routes and non-minority classified routes experiencing scheduled headway levels that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 22: Bus Headway Monitoring

BUS SCHEDULED HEADWAY MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2019	94.2%	5.8%	92.9%	7.1%	-1.3%
FALL 2020	92.1%	7.9%	87.0%	13.0%	-5.1%
FALL 2021	93.2%	6.8%	92.3%	7.7%	-1.0%
FALL 2022	93.1%	6.9%	92.5%	7.5%	-0.6%

Table 22: Bus Network Headway Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority classified routes than on non-minority classified routes.

Findings

Based on the table above, bus riders on minority classified routes were not disparately impacted during years 2019, 2020, 2021, and 2022. A disparate impact occurs if the percentage of riders on minority classified routes not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority classified routes not meeting the standard.

Rail Headway Monitoring

Table 23 below displays the proportion of rail customers on minority and non-minority classified branches experiencing scheduled headway levels that either meet or are above the CTA service standards and if a disparate impact occurred. This data is based off scheduled service levels.

Table 23: Rail Headway Monitoring

RAIL SCHEDULED HEADWAY MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2019	98.8%	1.2%	98.7%	1.3%	-0.1%
FALL 2020	98.4%	1.6%	99.0%	1.0%	0.6%
FALL 2021	98.6%	1.4%	99.3%	0.7%	0.7%
FALL 2022	98.4%	1.6%	98.5%	1.5%	0.1%

Table 23: Rail Headway Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority classified branches than on non-minority classified branches.

Findings

Based on the scheduled service data from Table 13 above, rail riders on minority classified branches were not disparately impacted during the years 2019, 2020, 2021, and 2022. A disparate impact occurs if the percentage of riders on minority classified branches not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority classified branches.

On-Time Performance Standard Monitoring

On-time performance of both minority and non-minority bus routes and rail branches were analyzed during years 2019, 2020, 2021, and 2022 in order to determine compliance with the CTA service standards.

Bus On-Time Performance Monitoring

Table 24 below displays the proportion of bus customers on minority and non-minority classified routes experiencing on-time performance levels that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 24: Bus On-Time Performance Monitoring

BUS ON-TIME PERFORMANCE MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2019	15.1%	84.9%	9.6%	90.4%	-5.4%
FALL 2020	10.6%	89.4%	5.6%	94.4%	-5.0%
FALL 2021	4.9%	95.1%	5.6%	94.4%	0.7%
FALL 2022	9.3%	90.7%	8.0%	92.0%	-1.3%

Table 24: Bus On-Time Performance Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority classified routes than customers on non-minority classified routes.

Findings

Based on the table above, bus riders on minority classified routes were not disparately impacted during years 2019, 2020, 2021, and 2022. A disparate impact occurs if the percentage of riders on minority classified routes not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority classified routes not meeting the standard.

Please note that the statistics in the table represent the proportion of customers experiencing service that meets the on-time performance standard, which requires that 65% of trips on a given bus route are on-time. For reference only, the percent of customers boarding on-time service systemwide are higher than the percentages shown in Table 14. In Fall 2019, Fall 2020, and Fall 2021, the on-time performance rate for a typical customer was 59%, 54%, 52%, and 54% respectively.

Rail On-Time Performance Monitoring

Table 25 below displays the proportion of rail customers on minority and non-minority classified branches experiencing on-time performance levels that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 25: Rail On-Time Performance Monitoring

RAIL ON-TIME PERFORMANCE MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
<i>FALL 2019</i>	79.8%	20.2%	68.0%	32.0%	-11.8%
<i>FALL 2020</i>	30.6%	69.4%	0.0%	100.0%	-30.6%
<i>FALL 2021</i>	30.9%	69.1%	0.0%	100.0%	-30.9%
<i>FALL 2022</i>	21.4%	78.6%	0.0%	100.0%	-21.4%

Table 25: Rail On-Time Performance Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for customers on minority branches than customers on non-minority branches.

Findings

Based on the table above, rail riders on minority classified branches were not disparately impacted during the years 2019, 2020, 2021, and 2022. A disparate impact occurs if the percentage of riders on minority classified branches not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of riders on non-minority classified branches not meeting the standard.

Please note that the statistics in the table represent the proportion of customers experiencing service that meets the on-time performance standard, which requires that 85% of trips on a given rail branch are on-time. For reference only, the percent of customers boarding on-time service systemwide are higher than the percentages shown in Table 15. In Fall 2019, Fall 2020, Fall 2021, and Fall 2022, the on-time performance rate for a typical customer was 86.5%, 58.6%, 65.0%, and 65.3% respectively.

Service Availability Standard Monitoring

Service availability for the CTA system was analyzed in order to determine compliance with the CTA service standards.

Table 26 below displays the proportion of households in minority and non-minority classified census tracts within the service area experiencing service availability levels that either meet or are above the CTA service standards and if a disparate impact occurred.

Table 26: Service Availability Standard Monitoring

SERVICE AVAILABILITY MONITORING				
MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
99.7%	0.3%	99.1%	0.9%	-0.6%

Table 26: Service Availability Monitoring

¹ A negative percentage (%) indicates service standards are met at a higher rate for households in minority classified census tracts than households in non-minority classified census tracts.

Findings

Based on the table above, households in minority classified census tracts within the service area are not disparately impacted. A disparate impact occurs if the percentage of households in minority classified census tracts not meeting the standard is at least fifteen percentage points (15%) higher than the percentage of households in non-minority classified census tracts not meeting the standard.

Service Policies Monitoring

Transit Amenities Distribution

Maps displaying the distribution of transit amenities, such as park and rides, bus turnarounds, canopies, elevators, bus shelters, digital and conventional signage, seating, escalators, and waste receptacles can be found in Appendix G.

Vehicle Assignment Distribution

Vehicle assignments of both minority and non-minority bus routes and rail branches were analyzed during years 2019, 2020, 2021, and 2022 in order to determine compliance with the CTA service policies.

Table 27 below displays the average age of vehicles by type at minority and non-minority garages. **Table 28** below displays the average age of rail cars on minority and non-minority branches.

Table 27 & 28: Bus and Rail Vehicle Assignment Monitoring

BUS VEHICLE GARAGE ASSIGNMENT MONITORING (AVERAGE AGE)				
YEAR	MINORITY	NON-MINORITY	MINORITY	NON-MINORITY
	40 FOOT		60 FOOT	
FALL 2019	9.8	11.8	10.0	8.5
FALL 2020	10.7	12.8	10.9	8.0
FALL 2021	12.0	12.3	11.9	10.4
FALL 2022	12.2	10.3	12.8	10.9

RAIL VEHICLE ASSIGNMENT MONITORING (AVERAGE AGE)		
YEAR	MINORITY	NON-MINORITY
FALL 2019	19.9	20.0
FALL 2020	20.7	21.1
FALL 2021	21.5	22.0
FALL 2022	22.3	22.8

Table 27 & 28: Bus and Rail Vehicle Assignment Monitoring

CTA tracks bus fleet age across the agency's seven garages to ensure that minority populations are not disparately impacted and that minority route riders are given the same vehicle experience as those on non-minority routes. In addition to being a key component of ensuring equal access, careful monitoring of the bus fleet at each garage helps CTA optimize its maintenance and operation practices. Minimizing the variation in bus models by garage familiarizes mechanics with particular bus models and minimizes inventory needs for spare parts. Since buses are purchased in large volumes and orders are typically spaced several years apart, concentrating similar bus types at the garages will result in some variation in fleet age between garages, but this has not resulted in a disparate impact on minority riders.

The vehicle assignment policy for the rail network is to maintain a uniform fleet age across the system. CTA currently operates four series of rail cars, which are each assigned to specific lines. This is necessary because each series has unique maintenance needs and requirements. Minimizing the number of terminals

each series is assigned to also ensures that the personnel at each terminal are knowledgeable and can ensure efficient operations, while minimizing the need to stock parts in multiple locations. Therefore, individual rail lines may have rail cars of varying ages. However, as shown in the table above, this has not disparately impacted minority riders.

05 DEMOGRAPHIC ANALYSIS

Current Service Profile

Service profile maps based on 2010 census tract data and American Community Survey (ACS) 2016-2020 census tract data are used to examine the extent of transit service available to minority and low-income populations within the CTA service area.

Maps displaying the geographic coverage of transit service in relationship to the census tracts identified as minority and non-minority and low-income and non-low-income populations based on the service area threshold can be found in Appendix G.

Demographic Ridership and Fare Payment

CTA collects socio-economic and ridership characteristics as well as fare payment information of CTA customers using Customer Satisfaction Surveys approximately every three years. CTA uses information collected to develop a demographic profile of customers, including comparisons of both minority riders and non-minority riders, and trips taken by these groups. The Customer Satisfaction Survey is conducted by the Regional Transportation Authority (RTA) on behalf of CTA, Metra, and Pace.

A 2020 RTA Customer Satisfaction Survey to establish the demographic profile of customers was planned but not fully executed, as survey administration began in March 2020 but was postponed shortly after launching due to the COVID-19 pandemic and City of Chicago and State of Illinois stay-at-home orders⁴. RTA in consultation with CTA, Metra, and Pace restarted the survey effort in Spring 2022 when concerns about the pandemic were significantly less pronounced and customers could safely be approached and recruited to take the survey onboard. Due to these circumstances, CTA is providing the demographic profile from the latest survey administered in 2022, as the results are the closest available information to the Triennial Report review period.

The 2022 Customer Satisfaction Survey was administered using both paper-based and web-based instruments. Paper surveys were distributed on board CTA vehicles and completed by customers in one of three ways; onboard and returned to the interviewer, completed later and mailed postage-paid; or completed later online using a URL with a unique ID and password. CTA customers were also recruited electronically to take the web-version of the survey using a robust email database of current CTA customers. The paper survey, which was available in English and Spanish, also informed customers that the survey could be completed online in English, Spanish, Polish, and Chinese. A total of 9,876 respondents completed and returned usable surveys. Of the respondents who successfully completed the survey, 1,088 were recruited onboard and 8,788 were recruited online, translating into a response rate of 12% and 11%, respectively. A total of 402 (4%) of surveys were completed in a language other than English: 322 surveys were completed in Spanish, 66 in Chinese, and 14 in Polish. The results are valid at the 95% confidence level with a margin of error of +/- 1%. Charts displaying information from the survey can be found in Appendix H.

Facilities

CTA did not construct any new vehicle storage facilities, maintenance facilities, or operation centers, as defined in FTA Title VI Circular 4702.1B during years 2019, 2020, 2021, and 2022.

Maps identifying existing facilities as well as recently completed, in-progress, and planned facility improvement or rehab projects in relationship to the census tracts identified as minority and non-minority and

⁴ Before the 2020 Customer Satisfaction Survey, the last RTA Customer Satisfaction Survey was completed in 2016.

low income and non-low-income level populations based on the service area threshold can be found in Appendix I.

06 PUBLIC ENGAGEMENT PROCESS FOR MAJOR SERVICE CHANGE POLICY

No major service changes occurred during the current review period (2019-2022).

07 SERVICE AND FARE EQUITY ANALYSES

Executive Summary

A public hearing on the proposed fare change was held virtually on November 11, 2021. Based on the then present disaster proclamation issued by Illinois Governor Pritzker due to public health concerns, the head of CTA determined it was not practical or prudent to conduct an in-person hearing. The hearing was live-streamed at: <https://youtu.be/kitgEWDDvIY>.

At the virtual public hearing, an American Sign Language interpreter and a Spanish interpreter were provided. Written and oral comments were recorded at the hearing in order for the Chicago Transit Board to take them into consideration prior to action.

The proposed budget and fare change is also available for public review at the CTA Headquarters, 567 W. Lake Street, Chicago, Illinois, 60661, weekdays between 8 a.m. and 4:30 p.m.

A copy of the proposed 2022 budget and fare change is also posted on CTA's website at www.transitchicago.com.

The Chicago Transit Authority (CTA) implemented fare changes that became effective November 21, 2021. It is CTA's objective to deliver service in an equitable and non-discriminatory manner. To that end, in the interest of Title VI requirements and in accordance with CTA's Service and Fare Equity Policy, CTA will avoid, minimize, or mitigate adverse impacts on minority populations or low-income populations when necessary and appropriate.

The results of the analysis are in Appendix K. The Fare Equity analysis shows that the planned fare changes would not cause a disparate impact on minority populations nor would they cause a disproportionate burden on low-income populations.

08 TITLE VI PROGRAM CONCLUSIONS and GOALS LOOKING AHEAD

CTA maintains its commitment to meet the requirements and objectives of the Title VI Program. In addition, CTA continues to look for opportunities to improve its Title VI programs and advance the Authority's mission. CTA commissioned the 2019 LEP Study, which identified opportunities for additional support to LEP communities, which will serve to enhance CTA's Title VI Programs for the next Triennial Period. Importantly, Title VI considerations are integrated throughout its decision-making processes.