



Title VI Program

October 2017



Regional
Transportation
Authority

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REGIONAL TRANSPORTATION AUTHORITY

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INTRODUCTION

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance. The Regional Transportation Authority ("RTA"), in providing financial oversight and regional planning to the northeastern Illinois region, and in its role as a designated recipient of Federal financial assistance, is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its activities or services on the basis of race, color, or national origin.

Pursuant to instructions given to RTA by Federal Transit Administration ("FTA") officials, this Title VI Program of the RTA has been developed pursuant to FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (the "Circular").

A. General Requirements

1. Requirement to Provide Title VI Assurances (4702.1B, Ch. III, § 2)

The Circular provides that "[t]his requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA." The RTA last provided its annual certifications and assurances to FTA on February 26, 2017 and has previously filed the same annually and in a timely manner.

The Circular also provides that "[p]rimary recipients shall collect Title VI assurances from subrecipients prior to passing through FTA funds." As part of all RTA subgrants of Federal funds, and all RTA contracts funded in whole or in part with Federal funds, the RTA requires each of its subrecipients or contractors to commit to the then-current certifications and assurances, which are also incorporated into the grant agreement or contract and become covenants to which the subrecipient or contractor are bound.

2. Requirement to Prepare and Submit a Title VI Program (4702.1B, Ch. III, § 4)

The Circular provides that "[r]ecipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity has approved the Title VI Program." Attached to this Title VI Program as *Exhibit A* is the ordinance for the Title VI Program that the RTA's Board of Directors approved on October 19, 2017.

The Circular further provides that "[s]ubrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts." The RTA has requested updated or new plans from the current group of ten (10) subrecipients, in accordance with the Title VI Circular, and will store them electronically.

3. Title VI Notice to the Public (4702.1B, Ch. III, § 4(a)(1))

In accordance with 49 C.F.R. Section 21.9, the RTA provides public notice of this program by way and in the form of the document attached as *Exhibit B*. This notice is provided on the RTA website at <http://www.rtachicago.com>, posted at the RTA's office on its public bulletin board and posted at the RTA's ADA certification sites on the public bulletin board.

4. Title VI Instructions to Public Regarding How to File a Complaint (4702.1B, Ch. III, § 4(a)(2))

The public notice attached as *Exhibit B* provides the public with instructions regarding how to file a Title VI complaint with the RTA. A copy of the complaint form provided to potential Title VI complainants is attached hereto as *Exhibit C*. The mechanics of addressing a complaint are described below and are also made available to the public upon request and via the RTA's website.

The General Counsel of the RTA is the Civil Rights Officer for Title VI and is responsible for receiving all Title VI complaints. Anyone wishing to file a complaint may also do so with the FTA's Office of Civil Rights, as indicated below. The RTA's Civil Rights Officer will provide quarterly reports to the RTA Executive Director of filed Title VI complaints and the status of each complaint. If appropriate, upon receipt of a complaint, the Civil Rights Officer will be responsible for conducting or overseeing the investigation of Title VI complaints and will also notify the complainant of the right to file a complaint directly with the FTA.

5. Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits since October 2014 (4702.1B, Ch. III, § 4(a)(3))

Since the last submission of RTA's Title VI program there have been no Title VI investigations, complaints or lawsuits naming the RTA.

6. Public Participation Plan (4702.1B, Ch. III, § 4(a)(4))

The RTA serves as the financial oversight and regional planning agency for mass transit in northeastern Illinois, and is not involved in the construction of transit facilities or the day-to-day operating aspects of providing most transit services. Because the RTA is primarily an oversight and planning body rather than an operator, its direct interaction with the public is fairly limited.

Public transportation services and construction projects in the region are provided and undertaken by the Chicago Transit Authority, Metra Commuter Rail Division and Pace Suburban Bus Division (collectively the “Service Boards”). Additional service is provided by third parties through the Job Access Reverse Commute (“JARC”), New Freedom, and Enhanced Mobility for Seniors and Individuals with Disabilities (§5310) programs.

In its oversight and planning role, the RTA is committed to promoting broad public participation and ensuring that the viewpoints of low-income, minority, and Limited English Proficiency (“LEP”) populations are sought out and considered in the financial oversight and regional planning process. Within the RTA, the Marketing and Communications Department promotes the work of the RTA and transit ridership. Specifically, the department responds to media inquiries; issues press releases and Ride On. blog posts; drafts collateral materials and speaker presentations, creates visual communications for the RTA website, and creates and oversees marketing campaigns which include purchased advertising to ensure riders, stakeholders and the general public are aware of the importance of transit to the region and the role of the RTA.

Below is a summary of RTA’s public outreach activities and tools undertaken since the last submission of RTA’s Title VI Program to encourage broad public involvement and meaningful access to minority and low income individuals.

Travel Information Center/Customer Service Center – Most of the direct interactions between the public and the RTA occur through the RTA Travel Information Center (“TIC”), which receives approximately 2.5 million calls annually. Through the TIC, the RTA provides over-the-phone trip planning assistance.

The RTA operates four Customer Service Centers that are located throughout the City of Chicago. These walk-in centers provide customers with disabilities and older adults assistance with registering for the RTA Reduced Fare and Ride Free programs. Translators for this service are available upon request. The Customer Service Centers also provide system maps in multiple languages at no charge.

Public Meetings and Hearings – The RTA holds general public meetings of its Board, as well as project-specific and program-specific meetings, including open houses and community group meetings. RTA Board of Directors meetings comply in all respects with the Illinois Open Meetings Act, 5 ILCS 120/1 *et seq.* RTA records are available to the public pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.* Also, each year, in compliance with the Act, the RTA holds public hearings on the Annual Budget, the Strategic Plan and the Five-Year Capital Program in each of the six counties in the

metropolitan region. To promote meaningful access to minority and low-income populations, the RTA works to ensure some of these preliminary hearings are held in locations convenient to minority and low-income populations in the northeastern Illinois region. Translators are available upon request, and there is a notification on the RTA website that explains how to request translation services.

RTA Website – The RTA maintains a website that provides various services and information directly to the public. Information regarding the RTA Transit Benefit program and the RTA’s Ride Free and Reduced Fare Programs, which aid in providing access to transit for low-income riders, is also available on the RTA website. The RTA Trip Planner is a multi-modal trip planner for Chicago and the metropolitan region which enables members of the public to create their own trip itinerary based on current schedules for the CTA, Pace and Metra. The public can also send email messages to RTA staff through the RTA website.

System Maps – The RTA publishes system maps in English and Spanish.

Program-Specific Presentations – The RTA makes public presentations on its Annual Budget, the Strategic Plan and the Five-Year Capital Program to each of the County Boards within the RTA’s boundaries and their Transportation Committees in November or December of each year. In accordance with 70 ILCS 3615/1.01 *et seq.* (the “RTA Act”), the RTA coordinates its public outreach activities with the Chicago Metropolitan Agency for Planning to ensure broad public involvement throughout the region. Translators are available upon request, and there is a notification on the RTA website that explains how to request translation services.

Public Documents and Records – The Annual Budget, the Strategic Plan and the Five-Year Capital Program and other public documents contain important information about the Service Boards and the RTA. As required by the RTA Act, the Annual Budget is a published, comprehensive annual budget and program document describing the state of the RTA and the Service Boards, its plans for operations and capital expenditures, and the means to finance them. The Five-Year Capital Program and the Strategic Plan set forth the standards of service which the public may expect, each Service Board’s plans for coordinating routes and service of the various transportation agencies, the anticipated expense of providing service that meets service standards, the nature, location and expense of anticipated capital improvements, and other data the RTA deems pertinent to each Service Board’s decision as to levels and nature of service. Through access to these documents and the RTA public hearings, the public has the opportunity to review and comment on activities of each of the Service Boards in the context of regional planning. As these documents are

quite extensive and translation costs would be great, translations of these documents are available to the public on request.

Americans with Disabilities Act (“ADA”) Paratransit – The RTA administers the regional ADA Paratransit Certification Program. Applicants submit an application, which is followed by in-person interviews and potentially functional assessments in order to determine eligibility for ADA Paratransit service. Information is provided in English, Spanish, and accessible formats (e.g. large-print, Braille, CD and audio). Also, bilingual (English and Spanish) in-person staff and additional language telephone translation services are available upon request. Accessible communication is provided via relay service for telephone, and sign language interpreters are available for in-person encounters. Contact information for this program can be found on RTA’s website and is published in program brochures.

RTA Transit Access Citizens Advisory Board (RTACAB) - The RTA Transit Access Citizens Advisory Board (the “RTACAB”) provides advice on issues related to the coordination of accessible public transportation services across the region, the provision and efficiency of other regional transportation programs, and the impact of the RTA’s policies and programs on the communities within the metropolitan region.

RTA Travel Training Program – The RTA operates a Travel Training Program, which provides professional, one-on-one training for people with disabilities and older adults on how to use the public transportation system. The Travel Training Program also provides individual and group transit orientation for those customers with disabilities and older adults who only need a brief orientation to fixed route transit service in order to use it independently. Travel trainers provide instruction in English and Spanish. Instruction in other languages is provided through a telephone-based translation service. Contact information for this program can be found on RTA’s website and is published in program brochures.

Ride Free Program – Seniors and people with disabilities who are enrolled in the Illinois Department on Aging’s Benefit Access Program are eligible to ride free on the Service Boards’ fixed-route bus and rail services. The Illinois Department on Aging determines eligibility for this program, and the RTA issues Ride Free permits to those found eligible by the State. Translators for this service are available upon request.

Reduced Fare Program – People aged 65 or older and other qualified individuals with disabilities are eligible for reduced fares on the Service Boards’ fixed-route services and on Metra. The RTA administers the Reduced Fare program, and translators for this service are available upon request.

Transit Fare Benefit Program – The RTA Transit Benefit Fare Program helps employees and employers save money on transit. IRS Section 132(f) allows for employees to have up to \$255 per month deducted pre-tax to pay for transit or vanpool commuting expenses. Typically, the RTA works directly with employers, who purchase fare media. However, in some cases, the RTA works directly with employees, and in those cases translators are available upon request. There is also a TTY line available for hearing impaired customers.

Regional Interagency Signage Program – The Interagency Signage Program is comprised of a series of colorful signs, maps, route diagrams and schedules that direct riders throughout the RTA transit system. The signage intentionally relies on universal icons and pictographs to bridge language barriers and is ADA-compliant.

RTA Funding Programs – The RTA offers planning, operating, and capital grant funding programs. The programs target innovative projects that will increase transit usage, improve the effectiveness of the region’s current transit system, provide for better mobility for seniors and people with disabilities, and improve job access.

Community Planning - The Community Planning program provides funding and planning assistance to appropriate planning projects that benefit the community. The program offers applicants an opportunity to participate in the planning of transportation, transit and transit-related opportunities. Services offered include transit-oriented development plans, transit improvement plans, and integrated transit and land use plans.

Section 5310 - The §5310 program, Enhanced Mobility for Seniors and Individuals with Disabilities, provides financial assistance for transportation services planned designed and carried out to meet the special transportation needs of seniors and individuals with disabilities.

Job Access Reverse Commute /New Freedom - The Job Access Reverse Commute (JARC) program is a federally funded program that provides operating and capital assistance for transportation services planned, designed, and carried out to meet the transportation needs of eligible low-income individuals and commuters regardless of income. The New Freedom program provides new public transportation services and public transportation alternatives beyond those required by the ADA. Projects funded through this program advance the goals of the RTA by reducing transportation barriers and expanding mobility for persons with disabilities.

Although all JARC and New Freedom funds have been awarded, there are several projects that continue to operate with those funds; as such the RTA's continues to administer and monitor those projects.

Innovation, Coordination and Enhancement ("ICE") - The ICE program was established as part of the 2008 Mass Transit Reform Legislation. The program provides funding to enhance the coordination and integration of public transportation and to develop innovations that improve the quality and delivery of public transportation. Projects funded through this program advance the vision and goals of the RTA by providing reliable transit services and enhancing efficiencies through effective management and innovative technology.

7. Language Assistance Plan for LEP Persons (4702.1B, Ch. III, § 4(a)(5))

The RTA is committed to ensuring that LEP persons have meaningful access to the RTA's public activities as it carries out its role as a financial oversight and regional planning agency related to the provision of public transit in northeastern Illinois. The RTA aims to provide language assistance to LEP persons where appropriate based on the number and proportion of LEP persons within the community, the frequency with which they encounter RTA public activities, the importance of the public activity, and resources available to the RTA.

Based on data from the U.S. Census Bureau's 2011-2015 American Community Survey (ACS) 5-year estimates, and as set forth in *Exhibit D*, the RTA has determined that approximately 1,017,526 individuals in the RTA region primarily speak a language other than English and speak English less than "very well."

Based on this information, and its contact with local and regional community groups, the RTA has conducted the following four-factor analysis of "the various kinds of contacts [the RTA] has with the public" as set forth in the U.S. DOT guidance provided at 70 FR 74087 (Dec. 14, 2005).

Factor One - The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program or Recipient

As an oversight and planning agency, the RTA rarely encounters its eligible service population and, consequently, the number of LEP persons served or encountered is quite low.

Based on the ACS data, the RTA has determined that Spanish and Polish represent the only languages (other than English) spoken by 1.00% or greater

of the regional population as a primary language. These Spanish and Polish speakers are further identified as those who speak “English less than very well.” This data set represents 629,915 Spanish speakers, comprising 7.91% of the region and 85,318 Polish speakers, or 1.07% of the region. Among Spanish speakers, 61.91% speak English less than “very well;” among Polish speakers, that percentage is 8.38%.

There is a substantial drop from Spanish and Polish to Chinese—the third next most represented language—which represents approximately 47,110 speakers, or 0.59% of the region. Next is Tagalog, with 22,388 speakers, comprising 0.28% of the region; Korean, 21,623, 0.27%; Russian, 18,867, 0.24%; and Arabic, at 18,607, 0.23%. Please see *Exhibit D* for an expanded treatment of this issue.

Factor Two - The Frequency with which LEP Individuals Come into Contact with the Program

In its role as an oversight and planning agency, the RTA rarely encounters its eligible service population or its LEP population. The only contacts with the LEP population occur through the programs described in the “Public Participation Plan” section above.

As previously discussed, Spanish or Polish speakers represent approximately seventy percent (70%) of the LEP population in the RTA area and constitute, by far, the groups most encountered.

Factor Three – The Nature and Importance of the Program, Activity or Service Provided by the RTA

The RTA values meaningful contact with LEP persons and facilitates meaningful contact with LEP persons through programs that invite public participation.

The nature of RTA’s public participation programs can be classified as high-volume, low-volume and passive. See *Exhibit E*.

The RTA operates two high-volume programs: the TIC, which handles approximately 2.5 million calls from the public each year and the RTA Customer Service Center, which provides travel assistance in-person to riders who need information about the ride-free or reduced fare programs. To better serve the region’s LEP population, the RTA has contracted to provide telephone-based language interpretation services in hundreds of languages. Real-time interpretation is available at any time by calling the language assistance line supported by selected contractor(s). Agents who speak English are available to callers 7 days per week at the TIC by calling 836-7000 from any regional area code. Spanish-speaking agents are also available at the TIC upon request.

The low-volume RTA programs are: (i) ADA Paratransit Eligibility Determination and Appeals; (ii) ADA Travel Training; (iii) RTA Public Meetings, Hearings, and other public planning and funding activities; (iv) Reduced Fare Passes; (v) Ride Free Program; and (vi) the Transit Fare Benefit Program.

The passive RTA programs, through which customers essentially “help themselves” are: (i) the RTA Trip Planner; (ii) RTA system maps; (iii) the RTA website; (iv) the RTA’s public documents; and (v) the Regional Interagency Signage Program. System maps are printed in English and Spanish, as is information about the Ride Free Program.

Factor Four – Resources Available to the RTA and Costs

The RTA is a relatively small oversight body, with approximately 110 employees, and a limited budget. To ensure that all reasonable measures are taken to provide meaningful access for LEP persons, the RTA contracts out many of the services and programs that touch and concern its interaction with the regional LEP population.

Measures Taken to Ensure Meaningful Access for LEP Persons

Please see the table at *Exhibit E* for a list of the RTA’s public programs, activities, service and measures taken to ensure contact with LEP persons. The RTA is committed to ensuring that the public is aware of the various language assistance services available and to provide notice of these services to LEP persons. The RTA performs ongoing reviews of the language assistance services it provides in order to ensure meaningful access for LEP persons to the RTA’s public activities.

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8. Racial Breakdown of Transit-Related, Non-Elected Planning Boards, Advisory Councils, or Committees, or Similar Decision-Making Bodies (4702.1B, Ch. III, § 4(a)(6))

<u>BODY</u>	<u>CAUCASIAN</u>	<u>LATINO</u>	<u>AFRICAN AMERICAN</u>	<u>ASIAN AMERICAN</u>	<u>NATIVE AMERICAN</u>
RTA Region*	52.16%	22.37%	16.97%	6.64%	0.09%
RTA Board of Directors	62.50%	6.25%	25.00%	6.25%	0.00%
RTA Transit Access Citizens Advisory Committee	75.00%	0.00%	25.00%	0.00%	0.00%

*Source: US Census Bureau State & County QuickFacts

RTA Board of Directors (the “Board”)

The RTA does not control the appointment of its Board of Directors and, consequently, cannot affect the participation of minorities on the Board. RTA directors are appointed by outside entities; the RTA Chairman is appointed by the other directors.

The fifteen non-chairman members of the sixteen-member Board are appointed as follows: five directors are appointed by the Mayor of the City of Chicago, with the advice and consent of the City Council of the City of Chicago; four directors are appointed by the votes of a majority of the members of the Cook County Board, a majority of the electors of which reside outside Chicago; one director is appointed by the President of the Cook County Board with the advice and consent of the members of the Cook County Board; and five directors are appointed by the Chairman or County Executives, as applicable, of the Counties of DuPage, Kane, Lake, McHenry, and Will, with the advice and consent of their respective county boards.

The Chairman of the RTA Board of Directors, who may not be appointed from among the other Directors and who must be a resident of the metropolitan region, is appointed by the other directors, by the affirmative vote of at least 11 directors based on the following formula: at least 2 affirmative votes from directors who reside in the City of Chicago; at least 2 affirmative votes from directors who reside in Cook County outside the City of Chicago; and at least 2 affirmative votes from directors who reside in the Counties of DuPage, Lake, Will, Kane, or McHenry.

RTA Transit Access Citizens Advisory Board (“RTACAB”)

The RTACAB is an eighteen-member board consisting of twelve (12) voting members and six (6) non-voting members. The voting members include a Chair, a Vice Chair, the Chairs of the three Citizens Advisory Boards of the RTA’s Service Boards (CTA, Metra and Pace), and seven (7) other voting members. The voting members include one representative of each of the six (6) counties of the metropolitan region (Suburban Cook, DuPage, Kane, Lake, McHenry and Will) and one (1) representative of the City of Chicago. The non-voting members include the Chair of the Pace Suburban ADA Advisory Committee; the Chair of the Pace Chicago ADA Advisory Committee; the Chair of the Metra ADA Advisory Committee; the Chair of the CTA ADA Advisory Committee; the Commissioner of the City of Chicago Mayor’s Office for People with Disabilities; and an RTA Staff representative.

9. Subrecipient Title VI Programs (4702.1B, Ch. III, § 4(a)(7))

Assistance

The RTA provides its subrecipients with informational resources to help them develop and adopt their own Title VI programs. They are provided with sample notices to the public informing them of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint and sample procedures for tracking and investigating Title VI complaints filed with the subrecipient. A sample of the information provided to subrecipients is attached to this Program as *Exhibit F*.

In addition to the packets, RTA provides technical assistance to all subrecipients on an as-needed basis by telephone and email.

Implementation

The RTA asks all current subrecipients with active projects to update their own programs and submit them to the RTA. The subrecipients can adopt the RTA’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. They are also notified that their board of directors or appropriate governing entity or official must approve the program.

The RTA offers continued technical support in the creation of the programs. The submitted programs are stored electronically by RTA.

Monitoring Ongoing Compliance

The RTA expressly requires compliance with all requirements of Title VI in all of its third-party contracts and grant agreements. These requirements apply to prime

contractors and flow through to subcontractors and subrecipients. Failure to pass through these provisions is considered a material breach of the third-party contract or grant agreement.

In compliance with JARC, New Freedom and §5310 programs, the RTA has also developed a compliance review process to assure subrecipients are in compliance with these programs. This process assists the RTA in ensuring compliance with federal requirements, including Title VI, by contractors and subrecipients, as well as improving project management and administration.

EXHIBIT A

**RTA ORDINANCE NO. 2017-45
APPROVING THIS TITLE VI PROGRAM**

WHEREAS, Title VI of the Civil Rights Act of 1964, as amended, requires that “[n]o person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance;”

WHEREAS, the FTA requires recipients and sub-recipients of federal public transportation funds to submit, every three years, a Title VI program update as a condition of receipt of FTA financial assistance;

WHEREAS, the Regional Transportation Authority (the “Authority”) is the direct recipient of funding from the Federal Transit Administration (“FTA”); and

WHEREAS, the current approval period for the RTA ends on November 30, 2017, and a Title VI program update must be submitted to the FTA.

NOW, THEREFORE BE IT ORDAINED BY THE BOARD OF DIRECTORS OF THE REGIONAL TRANSPORTATION AUTHORITY that:

- 1) The Board of Directors of the Authority hereby approves the Title VI Plan substantially in the form attached hereto, dated October 2017, which contains revised and updated information specific to Federal Transit Administration programs as required by Section 601 of the 1964 Civil Rights Act.
- 2) The Executive Director of the Authority is hereby authorized and directed to take any and all actions as the Executive Director deems necessary and appropriate to implement, administer and enforce this ordinance and the RTA Title VI Program, including the preparation and execution of any and all further documents or other materials required for certification.

ADOPTED OCTOBER 19, 2017

EXHIBIT B

RTA'S TITLE VI NOTICE TO THE PUBLIC

[Attached]

The RTA's Title VI Notice is posted at:

The RTA Offices, 15th and 16th Floors
175 W. Jackson Boulevard
Chicago, IL
60604

The RTA's ADA Paratransit
Certification Sites,
operated by Medical
Transportation
Management, Inc.:

8753 S Greenwood
Chicago, IL
60619

4320 W. Montrose
Chicago, IL
60641

RTA website:

<http://www.rtachicago.com>

RTA Employee Handbook

TITLE VI NOTICE

The Regional Transportation Authority (“RTA”) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the RTA receives Federal financial assistance.

Interested parties may obtain a copy of the RTA’s Title VI Program on the RTA’s website or by requesting a copy of the program directly from the RTA. To request copies of the program in an alternative format in accordance with ADA and LEP regulations contact the RTA’s Regulatory Compliance Officer at 312-913-3212. The RTA offers a variety of resources and services in other languages free of charge. Services include but are not limited to the following: oral interpreters, written language services and translations of vital documents.

Any person who believes that they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a formal complaint with the RTA or FTA, as shown below.

Please direct all questions concerning the above to:

Regulatory Compliance Officer
Regional Transportation Authority
175 West Jackson Boulevard
Suite 1650
Chicago, Illinois 60604

Please contact the following to initiate a formal complaint:

General Counsel
Regional Transportation Authority
175 West Jackson Boulevard
Suite 1650
Chicago, Illinois 60604

or

Federal Transit Administration
Office of Civil Rights
Attention; Complaint Team
East Building, 5th Floor - TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

EXHIBIT C

RTA'S TITLE VI COMPLAINT FORM

TITLE VI COMPLAINT FORM***

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

General Counsel***
Regional Transportation Authority
175 West Jackson Boulevard
Suite 1650
Chicago, Illinois 60604

Please print clearly or type:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____

Person allegedly discriminated against: _____

Address of person allegedly discriminated against:

City, State, Zip Code:

Please indicate the basis for the complaint (check all that apply):

- race or color
- national origin
- income
- other (explain): _____

What was the date of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe the circumstances forming the basis of the complaint:

Please list any and all known witnesses' names and contact information:

What type of corrective action are you seeking?

Please attach any documents you have which support the allegation, then sign and date this form and send to the person listed on the first page of this form.

Your Signature

Print your name

Date

*****This form is for use in filing a Title VI Complaint with the RTA only. Anyone wishing to file a complaint with the FTA may do so at the following address:**

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

The FTA's complaint form may be found at:
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Consolidated_Civil_Rights_Complaint_Form.pdf

EXHIBIT D

RTA REGION LEP DEMOGRAPHICS

		Percentage of Region	Percentage of < "very well"
7-County Regional Total Population	7,961,422	100%	N/A
Speak another language, but English less than "very well"			
Spanish or Spanish Creole:	629,915	7.91%	61.91%
French (incl. Patois, Cajun):	5,389	0.07%	0.53%
French Creole:	1,080	0.01%	0.11%
Italian:	9,433	0.12%	0.93%
Portuguese or Portuguese Creole:	1,178	0.01%	0.12%
German:	4,664	0.06%	0.46%
Yiddish:	101	0.00%	0.01%
Other West Germanic languages:	405	0.01%	0.04%
Scandinavian languages:	391	0.00%	0.04%
Greek:	7,893	0.10%	0.78%
Russian:	18,867	0.24%	1.85%
Polish:	85,318	1.07%	8.38%
Serbo-Croatian:	11,444	0.14%	1.12%
Other Slavic languages:	14,266	0.18%	1.40%
Armenian:	669	0.01%	0.07%
Persian:	2,185	0.03%	0.21%
Gujarati:	17,025	0.21%	1.67%
Hindi:	8,605	0.11%	0.85%
Urdu:	12,597	0.16%	1.24%
Other Indic languages:	6,859	0.09%	0.67%
Other Indo-European languages:	16,241	0.20%	1.60%
Chinese:	47,110	0.59%	4.63%
Japanese:	5,136	0.06%	0.50%
Korean:	21,623	0.27%	2.13%
Mon-Khmer, Cambodian:	1,772	0.02%	0.17%
Hmong:	115	0.00%	0.01%
Thai:	3,109	0.04%	0.31%
Laotian:	1,565	0.02%	0.15%
Vietnamese:	9,824	0.12%	0.97%
Other Asian languages:	14,262	0.18%	1.40%
Tagalog:	22,388	0.28%	2.20%

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Other Pacific Island languages:	1,351	0.02%	0.13%
Navajo:	0	0.00%	0.00%
Other Native North American languages:	164	0.00%	0.02%
Hungarian:	922	0.01%	0.09%
Arabic:	18,607	0.23%	1.83%
Hebrew:	668	0.01%	0.07%
African languages:	8,251	0.10%	0.81%
Other and unspecified languages:	6,134	0.08%	0.60%
Total less than < "very well"	1,017,526	12.78%	100.00%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, Table B16001 language spoken at home by ability to speak English for the population 5 and over. Universe: Population 5 years and older.

EXHIBIT E

**PROGRAMS, ACTIVITIES AND SERVICES THROUGH WHICH THE RTA COMES INTO CONTACT
WITH THE PUBLIC AND LEP MEASURES TAKEN WITH RESPECT TO THE SAME**

Program, Activity, or Service	LEP Measures
High Volume Programs or Services	
RTA Travel Information Center	<ul style="list-style-type: none"> • Real-time, telephone-based language interpretation services are available in hundreds of languages through an RTA contractor.
RTA Customer Service Center	<ul style="list-style-type: none"> • Centrally located and near public transportation in order to provide meaningful access to persons from throughout the entire region. • Real-time, telephone-based language interpretation services are available in hundreds of languages through an RTA contractor.
Low Volume Programs or Services	
ADA Paratransit Eligibility Determination and Appeals	<ul style="list-style-type: none"> • Translators are available upon request in hundreds of languages through an RTA contractor.
ADA Travel Training	<ul style="list-style-type: none"> • Translators are available upon request in hundreds of languages through an RTA contractor.
RTA Public Meetings, Hearings, and Other Publicly-Held Key Planning and Funding Activities	<ul style="list-style-type: none"> • Notification on the RTA website that explains how to request translation services. • RTA contracts with a firm to translate key documents (or summaries of documents) or provide in-person translation assistance in hundreds of languages upon request. • RTA holds these events in areas accessible to transit and affirmatively provides translation services at meetings held in areas with concentrated LEP populations.
Reduced Fare Passes	<ul style="list-style-type: none"> • Translators are available upon request for seniors or members of the disability community seeking reduced fare passes.
Ride Free Program	<ul style="list-style-type: none"> • Translators are available upon request for seniors or members of the disability community seeking to enroll in the Ride Free Program, which is an income-tested free ride program.
Transit Fare Benefit Program	<ul style="list-style-type: none"> • Translators are available upon request for members of the public seeking to enroll in the Transit Fare Benefit Program.

Passive Programs or Services	
RTA Website	<ul style="list-style-type: none"> • Where possible, the website uses universal icons and pictographs to bridge language barriers for speakers of other languages.
	<ul style="list-style-type: none"> • Customers can utilize free online translation programs such as Google Translate or Babelfish.
RTA Trip Planner	<ul style="list-style-type: none"> • Where possible, the website uses universal icons and pictographs to bridge language barriers for speakers of other languages. • Customers can utilize free online translation programs such as GoogleTranslate or Babelfish.
Regional Interagency Signage Program	<ul style="list-style-type: none"> • Way-finding and transit information signs intentionally rely on universal icons and pictographs to bridge language barriers. In most cases, limited space for text on signs precludes use of languages other than English.
RTA Public Documents	<ul style="list-style-type: none"> • Translations of these documents are available to the public on request
System Maps	<ul style="list-style-type: none"> • These publications are published in English and Spanish.

EXHIBIT F

REPRESENTATIVE SUBRECIPIENT TITLE VI INFORMATION
(Actual Programs filed electronically at the RTA)

SAMPLE PROGRAM. A subrecipient may use this as a guide only for completing the agency's program. For the 2017 Program, the RTA is offering subrecipients the opportunity to adopt the RTA's recipient's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. Please contact the RTA with any questions.

A. Title VI Program Notice:

The notice as required by law:

"No person in the United States shall on the ground of race, color, or national origin be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal Financial assistance." (42 USC 2000d)

B. Complaint Processes: How to file a Complaint, Complaint Resolution and Appeal

1. Purpose: To allow a recipient of services an opportunity to voice his or her dissatisfaction with services in direct relation to Title VI of the Civil Rights Act of 1964 services.
2. Complaint Process
 - a. Direct Service is provided by a paid or auxiliary staff member in the following positions: (Change as needed)
 - i. Program Manager
 - ii. Transportation Manager
 - iii. Program Coordinator
 - iv. Dispatchers
 - v. Drivers

The above staff provides patrons an opportunity to voice dissatisfaction with service and a patron may begin a Title VI grievance at any time. Grievance intake is received without judgment and if no satisfaction can be given the patron, the individual is directed to speak to (Name of Position).

b. An opportunity also exists at the monthly scheduled _____, an _____ or to the Board of _____. On the agenda in the meeting is the "Remarks from the Audience." Patrons may voice their dissatisfaction at this time if they chose.

- c. Located in the lobby area is a Suggestion Box with cards and pen for anyone to write a comment or suggestion. Suggestions must be signed to be read at the Committee Meeting.
 - d. After a complaint is received, the staff person in charge of the service contacts the patron to discuss the issue. If the client is still dissatisfied, the (Name of Position) will call and discuss the issue with the patron.
 - e. If satisfaction cannot be reached, the (Name of Position) invites the patron to address the issue with the (Name of Higher Level Position)
 - f. Patrons are able to voice a grievance without discrimination or reprisal. If a staff person reacts inappropriately to a complaint, the (Name of Position) will address the issue through some form of disciplinary action ranging from a management note to written warning up to and including termination based on the incident. Customer Service training is ongoing and the core value of respect is taken very seriously. If a staff person acts inappropriately, s/he/they may be dismissed.
3. Complaint Resolution Process
 - a. Once a complaint is lodged, we are duty-bound to investigate it with staff and persons involved. If the complaint is a result of an “incident”, an Incident Report is to be completed and signed by the staff member involved. A copy of the Incident Report is given to the (Name of Position) and (Name of Higher Position).
 - b. The patron must first discuss his/her grievance with the staff person in an attempt to resolve the problem. If, after discussion with the persons involved no resolution can be reached, the (Name of Position) contacts the patron to discuss the issue.
 - c. The (Name of Position) will investigate all sides of the grievance the patron will be notified in writing of a decision and the supporting reasons within 10 working days of notification of the grievance.
 4. Appeal Process
 - a. If the grievance is not resolved, the patron may appeal in writing to the (Name of Higher Position) within five (5) working of receipt of notification from the (Name of Position) of his/her decision. The (Name of Higher Position) will investigate all sides of the grievance and will notify the patron in writing of his or her decision and supporting reasons within ten (10) working days from the date the (Name of Higher Position) received the written appeal.

b. If a patron feels uncomfortable discussing the grievance with the (**Name of Position**), she/he may immediately bring the grievance to the attention of the (**Name of Higher Position**).

c. Complaint Form

d. Listing of all Title VI Investigations, Complaints, or Lawsuits (**If none please state NONE**)

e. Discuss the agency's public involvement process. Public involvement should be early, often and continuous. The Plan should include information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of the outreach efforts made since the last Title VI Program submission.

f. LEP (Limited English Proficient) Program. Information available at:
<http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/pdf/05-23972.pdf>

1. Analyze census data on language usage.
2. Identify vital documents for translation
3. Provide translation of public notices, as needed.

g. Membership of Boards, Committees and Councils (Provide a description on how these entities are chosen, a table that depicts the membership by race and a description of the process the agency uses to encourage the participation of minorities on such entities.)

h. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or officials(s) responsible for policy decisions reviewed and approved the Title VI Program.