



U.S. Department
of Transportation
**Federal Transit
Administration**

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

December 19, 2025

Ms. Nora Leerhsen
Acting President
Chicago Transit Authority
567 W. Lake Street
Chicago, I.L. 60661

Dear Ms. Leerhsen:

The Federal Transit Administration (FTA) has determined that the Chicago Transit Authority (CTA) has failed to comply with the requirements of Special Directive 25-3, *Required Actions to Address Transit Worker Assault and Public Safety Concerns* (December 8, 2025) (SD 25-3). Among other requirements, SD 25-3 required CTA to submit a security enhancement plan (Plan) that included significant crime and assault reduction targets and a security staffing surge plan.

The security enhancement plan CTA submitted on December 15, 2025 (Dec. 15 Plan) is materially deficient and fails to meet the need for immediate, measurable corrective action to maintain a safe operating environment for workers and passengers under SD 25-3 Required Action FTA-25-3-002. This letter reiterates the requirements of SD 25-3 and explains what remedial action CTA must take to correct its violation of the Special Directive.

CTA has 90 days from the date of this letter to submit a revised Plan and obtain FTA concurrence to comply with SD 25-3. If CTA fails to come into compliance by that date, this letter constitutes formal notice under 49 U.S.C. 5329(g)(2)(B) and 49 CFR 670.23(c) that FTA will withhold 25 percent of Urbanized Area Formula program funds apportioned to CTA under 49 U.S.C. § 5307 (5307 Funds).

Legal Authority

Under 49 U.S.C. § 5329(g)(2)(A) and 49 CFR 670.23(b), FTA is authorized to withhold up to 25 percent of 5307 Funds from a recipient that has engaged in a pattern or practice of serious safety violations, or has otherwise refused to comply with the Public Transportation Safety Program, as codified at 49 U.S.C. § 5329, or any regulation or directive issued under those laws for which the Administrator exercises enforcement authority for safety.

Finding of Violation

FTA rejects CTA's Dec. 15 Plan, finding that CTA has refused to comply with SD 25-3 Required Action FTA-25-3-002 because the Dec. 15 Plan (1) fails to target significant reductions in transit

worker and customer assaults and other crime, and (2) fails to significantly increase security or law enforcement presence on its rail and bus transit systems.

Statement of Facts

SD 25-3 required that CTA develop a Plan including “targeted, *significant* reductions in transit worker and customer assaults and other crime” and explicitly required that “[t]argets must be set showing reductions for *each* of the next six months.” See SD 25-3 Required Action FTA-25-3-002(1) (emphasis added). The Dec. 15 Plan fails to do so. For January, February, and March 2026, the Dec. 15 Plan targets for Major Assaults Against a Transit Worker and Customer Assaults are unchanged from baseline levels, at 8 and 19 assaults per month, respectively. By proposing flat targets for the entire first quarter of the Dec. 15 Plan, CTA has failed to set targets showing reductions for “each” month as ordered. SD 25-3 requires full implementation of the security surge by December 19, 2025. See SD 25-3 Required Action FTA-25-3-002(2).

Consequently, the impact of increased law enforcement presence should be immediate and reflected in the January 2026 and forward targets across all categories.

Even where CTA proposes reductions, in no category does the Dec. 15 Plan target significant reductions in crime or assault over baseline levels.¹ For example, CTA never targets a reduction of more than one assault per month in any given category, and in many categories and months, CTA targets zero reductions. Baseline data indicate that, on CTA today, roughly two workers every week are subjected to assaults that put them in an ambulance or kill them. The Dec. 15 Plan barely changes that status quo.² That is unacceptable.

To come into compliance with SD 25-3, CTA must immediately revise and resubmit crime reduction targets that demonstrate significant, measurable reductions in all applicable National Transit Database (NTD) reportable categories commencing in the first full month following CTA’s implementation of an FTA-approved Plan.

CTA’s security staffing enhancements must be sufficient to achieve the significantly reduced targets FTA requires. CTA must explain, with specificity, how its security staffing surge plan levels will support its revised crime-reduction targets.

¹ Without explanation, CTA uses a different baseline measurement period for the Non-Major Assaults Against a Transit Worker category only. FTA expects CTA to clarify the reason for and impact of that decision compared to using a uniform baseline measurement period across all categories.

² The baseline metric for Major Assaults Against a Transit Worker is an average eight assaults/month, equating to two victims/week in a month with four weeks. The Dec. 15 Plan maintains that rate for the first three months of the Plan, and for the latter three months targets seven assaults/month, or 1.75 victims/week. “Major assaults” includes fatalities confirmed within 30 days and injuries requiring immediate transport away from the scene for medical attention. See Fed. Transit Admin., National Transit Database Safety & Security Policy Manual at 15 (Jan. 2025).

Remedial Action Required

FTA orders CTA to submit a revised Plan that (1) includes significantly increased crime reduction targets and (2) demonstrates that proposed security personnel enhancements are sufficient to achieve the revised crime reduction targets in CTA's Plan resubmission.

Submission of a revised Plan for FTA consideration and concurrence does not toll the 90-day notice period for FTA to take enforcement action. If FTA withholds funds, that restriction will remain in place until FTA approves a Plan. FTA continues to monitor CTA's compliance with all Required Actions under SD 25-3 and reserves the right to take further enforcement action for noncompliance.³

Under SD 25-3 Required Action FTA-25-3-002(2), CTA is required to implement an FTA-approved Plan in full by December 19, 2025. Until CTA obtains FTA concurrence on a Plan, CTA will be in violation of FTA-25-3-002(2). FTA urges CTA to take immediate action to significantly reduce assaults and crime on its transit system, even in the absence of an FTA-approved Plan.

Right to Reply

Pursuant to 49 CFR 670.23, within 30 days of this notice, CTA may file a written reply with the Administrator. The Administrator will issue a written decision within 30 days of receiving such a reply.

FTA expects CTA's prompt attention to this matter and anticipates receiving a revised Plan for review. For assistance with these requirements, please contact Mr. Joseph DeLorenzo, Associate Administrator for Transit Safety and Oversight and Chief Safety Officer, telephone 202-366-1783 or joseph.delorenzo@dot.gov.

Sincerely,



Marcus J. Molinaro

³ FTA noted a statement in the Dec. 15 Plan indicating CTA intends to submit its Public Transportation Agency Safety Plan (PTASP) annual update within fourteen days following Chicago Transit Board committee approval at the board's January 2026 meeting. FTA reiterates that CTA is required to submit its PTASP within 7 days of approval by its board and no later than December 31, 2025 to comply with SD 25-3 Required Action FTA-25-3-001.