

TITLE VI PROGRAM

Civil Rights Act of 1964

The Greater Northside Management District

April 2020

**Policy Statement**

The Greater Northside Management District (hereinafter referred to as “District”) assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and in accordance with Title VI regulations (49 CFR part 21) consistent with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration and any future updates, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which federal aid funds are used (Federally Funded Program). The District will integrate Limited English Proficient (LEP) Persons (70 FR 74087) Recipients’ Responsibilities into their programs and activities in Spanish and other languages, upon request.

**Authorities**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 42 USC 2000d, 49 CFR part 21 and FTA C 4702.1B).

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Rebecca Rayna  
Executive Director  
Greater Northside Management District

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Date

## **Introduction**

The Greater Northside Management District (“District”) was created by the 77th Texas Legislature pursuant to H.B. 3634 in 2001. The City of Houston (“City”) gave its formal consent to the creation of the District after its passage by the Legislature. Under its first service plan, the District assessed commercial property owners to provide services and improvements to the District and to encourage economic development.

The District was formed in order to enhance the area and increase economic activity for business property owners. The District works to establish and implement projects and programs to: promote public safety in the District; enhance public image and perception; attract more businesses and additional investment to the District; and improve infrastructure and amenities by seeking additional public and private funds to invest that will ensure growth and a better experience to live, work and play.

The District developed this Title VI Program to address the requirements of the FTA Circular 4702.1B, Title VI Requirements and Guidelines for FTA Recipients. The District has developed all of the necessary procedures and processes to be in compliance with Title VI regulations, including a complaint process and a Title VI notice to the public.

The District’s Board of Directors reviewed and approved the Title VI Program. A copy of the resolution approving the program is provided in **Appendix B**.

## **Requirement to Notify Beneficiaries of Protection under Title VI**

The District will post the following notice to the public at the District offices and on the District’s website. Since Houston Metro runs the area’s transit program, Metro’s Title VI notice is listed on transit stops and buses.

### *Title VI Public Notice*

*The Greater Northside Management District hereby gives public notice that it is the District’s policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. 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 receiving federal financial assistance.*

*Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the District. Any such complaint must be in writing or by phone and filed with the District Civil Rights Coordinator within one hundred-eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant by calling 713-229-0900. Individuals may get more information*

*about the Title VI Program by calling 713-229-0900 or by emailing [info@greaternorthside.org](mailto:info@greaternorthside.org).*

*If you like more information on Title VI, please visit the District website (<http://www.greaternorthside.org/>) or contact the District via phone 713-229-0900, via email to [info@greaternorthside.org](mailto:info@greaternorthside.org), or via mail to: 5305 Irvington Blvd, Houston, Texas 77009. This notice is to be posted in the offices of the District, on the District website (<http://www.greaternorthside.org/>) and at other strategic locations throughout the District.*

*The District will provide translations of all requested documents or provide a translator at any public meetings at no cost.*

*If information is needed in another language, contact the District at 713-229-0900.*

#### *Título VI Aviso Público*

*Por medio de la presente, el Distrito Administrativo de Greater Northside (Distrito) le notifica al público su política de garantizar el pleno cumplimiento del Título VI del Acta de Derechos Civiles de 1964 de la Ley de Restauración de Derechos Civiles de 1987 y de los estatutos y reglamentos relacionados a tales leyes, en todos los programas y actividades del Distrito. El Título VI establece que ninguna persona en los Estados Unidos de América puede ser excluida por motivos de raza, color, o nacionalidad de participar en, ser negado los beneficios de, o ser sujeto de otro modo a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal.*

*Si usted cree haber sido perjudicado por una práctica discriminatoria e ilegal bajo el Título VI puede presentar una queja formal ante el Distrito. Las quejas pueden hacerse por escrito o por teléfono. Estas deben ser presentadas ante el Coordinador del Derechos Civiles del Distrito dentro de los ciento ochenta (180) días siguientes a la fecha de la ocurrencia discriminatoria alegada. Los Formularios de Queja de Discriminación del Título VI se pueden obtener en esta oficina sin costo alguno para el reclamante llamando al 713-229-0900. Las personas pueden obtener más información sobre el Programa Título VI llamando al 713-229-0900 o enviando un correo electrónico a [info@greaternorthside.org](mailto:info@greaternorthside.org).*

*Para obtener más información acerca del Título VI, visite nuestra página web (<http://www.greaternorthside.org/>), llámenos al teléfono 713-229-0900, escríbanos por correo electrónico ([info@greaternorthside.org](mailto:info@greaternorthside.org)), o envíenos un correo postal: 5305 Irvington Blvd, Houston, Texas 77009. Este aviso será publicado en las oficinas, en la página web (<http://www.greaternorthside.org/>) y en otros lugares estratégicos a lo largo del Distrito.*

*El Distrito proporcionará traducciones de todos los documentos solicitados o proveerá un traductor en cualquier reunión pública sin costo alguno.*

*Si se necesita información en otro idioma, póngase en contacto con Distrito a 713-229-0900.*

### **Requirement to Develop Civil Rights Complaint Procedures and Complaint Form**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, as amended, and the Americans with Disabilities Act (ADA) of 1990, as amended, relating to any transportation or program or activity receiving federal financial assistance administered by the District or sub-recipients and contractors. The program is also conducted in accordance with FTA Circular 4702.1B as well as the FTA Circular 4710.1, ADA Guidance. The District's Civil Rights Complaint Form is provided in **Appendix A**.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The Civil Rights Coordinator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Any individual, group or individuals or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the District (see **Appendix A**). A formal complaint must be filed within 180 calendar days of the alleged occurrence, or when the alleged discrimination became known to the complainant. These procedures are part of an administrative process, which do not provide for remedies that include punitive damage or compensatory remuneration for complainant.

The complainant must meet the following requirements.

1. Complaint shall be in writing and signed by the complainant(s).
2. Present the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination, the date on which that conduct was discontinued or the latest instance of the conduct).
3. Present a detailed description of the issues including name(s) and job(s).

Allegations received by fax or email will be acknowledged and processed, once the identity(ies) of the complainant(s) and the nature of the complaint are determined. The complainant is required to mail a signed, original copy of the fax or email transmittal to the District in order for the District to be able to process it. All correspondence to the District for processing should be addressed to the Executive Director and should have "Attn: FTA Compliance" on the outside. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return to the District for processing.

Complaint will be accepted based on the following:

1. If complaint has been filed in timely manner;
2. If complaint/allegations involve a covered basis such as race, color, national origin or disability; and

3. If complaint/allegations involve a program or activity of a federal-aid recipient, sub-recipient, or contractor or, in the case of ADA allegations, an entity open to the public.

A complaint may be dismissed for the following reasons:

1. Complainant requests the withdrawal of the complaint;
2. Complainant fails to respond to repeated requests for additional information needed to process complaint; or
3. Complainant cannot be located after reasonable attempts.

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. The District has authority for accepting complaints for investigation, but complainants may also file complaints with TxDOT or the Federal Transit Administration within 180 days of the alleged offense. If you would like to file with TxDOT, please send a written complaint to TxDOT Public Transportation, 3712 Jackson Avenue, Building 6, 5th floor, Austin, Texas 78731. If you would like to file with FTA, please send a written complaint to FTA Region VI, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102.

Once the District decides to proceed with the investigation (final decision to proceed will be made by Executive Director and Chairman/woman of the Board of Directors), the complainant will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a reference code that will correspond to the District's records identifying its basis of alleged harm: race, color, national origin or disability.

In cases where the District engages into investigation of the complaint, the Civil Rights Coordinator will provide the individuals identified in the complaint the opportunity to respond to the allegations in writing. The identified individuals will have ten (10) calendar days from the date of the District's written notification of acceptance of the complaint to furnish his/her response to the allegations.

Within 30 calendar days of the acceptance of the complaint, the Civil Rights Coordinator will prepare an investigative report for the Chairman/woman of the Board of Directors. The report shall include a narrative description of the incident, identification of persons interviewed, and findings and recommendations. The Chairman/woman of the Board of Directors will have ten (10) calendar days to review and provide comments to the Civil Rights Coordinator.

After the Civil Rights Coordinator address any comments from Chairman/woman of the Board of Directors about the preliminary investigative report, the report and its findings will be forwarded to the District's legal consultant for review. The legal consultant will review the report and associated documentation and will provide input within ten (10) calendar days.

The District's final investigative report and a copy of the complaint will be forwarded to the Complainant and the FTA within 60 calendar days of the acceptance of the complaint. The District will notify all parties of its findings.

**Requirement to Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits**

There were no transit-related Title VI investigations, complaints, and/or lawsuits in the past three (3) years.

	<b>Date</b> <i>(Month, Day, Year)</i>	<b>Summary</b> <i>(include basis of complaint: race, color, or national origin)</i>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1	None			
2				
3				
<b>Lawsuits</b>				
1	None			
2				
3				
<b>Complaints</b>				
1	None			
2				
3				

**Promoting Inclusive Public Participation**

It is the goal of the District to establish a public participation process that is inclusive, transparent, efficient, and purposeful for citizens/constituents to become engaged in planning activities. All minority socioeconomic groups will be included in the planning process. The District will ensure that members of the public are informed and involved as early as possible. The District will ensure that bilingual staff will be at meetings to translate, if necessary. The District is committed to having the public’s issues and concerns heard and that their concerns are considered prior to any final decisions. The Public Participation Plan ensures that all communications and public involvement efforts comply with the Title VI Program. The District is committed to:

1. Use different communication practices to educate and effectively disseminate information to the public, including, but not limited to: emails, letters, postcards, social media, and flyers to be distributed at various locations.
2. Encourage effective communication among a diverse group of stakeholders, including interactive ways of communication.
3. Provide ample opportunity and promote continued participation.
4. Incorporate public comments and recommendations into the decision making process.
5. Evaluate the effectiveness of the public participation strategies.

The District provides multiple methods for individuals to provide comments and feedback. The District is active daily on their Facebook account, <https://www.facebook.com/greaternorthsidemanagementdistrict/>, and provides information regarding

meetings on that platform. The District holds Spanish townhalls on the platform to provide information to its LEP populations.

*Special Emphasis Program Areas*

The Executive Director, the Chairman/woman of the Board, and the District’s Capital Improvement Committee, will annually update and coordinate the District’s future plans for transportation improvement programs and projects. Projects included in the update are the result of evaluation and prioritization of needs in various transportation areas. The evaluation process includes input from staff, cities, local jurisdictions and organizations, citizen groups, and private individual.

**Requirement to Provide Meaningful Access to Limited English Proficiency (LEP) Persons – Four Factor Analysis**

*Factor 1 Assessing the Number or Proportion of LEP Persons served or Encountered in Eligible Service Population*

*(a) How LEP persons interact with the recipient’s agency*

LEP individuals would come in contact with the District during the planning, procurement, and construction of federally approved transit and pedestrian capital projects.

*(b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group*

According to the American Community Survey 2015, there is 37.4% of the District population (all US Census Tracts that have a portion within the District boundaries) who speak English “less than well” that speak a language other than English at home. The percentage of Spanish-speaking individuals who report speaking English “less than well” is 37.1% of the total management district population or 50,166 individuals, which meets the Safe Harbor threshold of 1,000 individuals or 5% of the population.

2015 American Community Survey Data							
Greater Northside Management District							
Limited English Proficiency							
Language Spoken at Home	Speak English "very well"		Speak English "less than well"		Total		
	Number "very well"	Percent	Number "less than well"	Percent	Total Number	Percent of Total Language Sub-Group	Speaking Less than Well Percent of Total Population
<b>Total population</b>					135,085		
Speak only English					47,831	35.41%	
Spanish or Spanish Creole	35,781	41.63%	<b>50,166</b>	58.37%	85,947	63.62%	<b>37.14%</b>
French (incl. Patois, Cajun)	126	84.56%	23	15.44%	149	0.11%	0.02%
French Creole	36	87.80%	5	12.20%	41	0.03%	0.00%
Italian	22	100.00%	0	0.00%	22	0.02%	0.00%
Portuguese or Portuguese Creole	0	0.00%	0	0.00%	0	0.00%	0.00%
German	85	69.11%	38	30.89%	123	0.09%	0.03%
Yiddish	0	0.00%	0	0.00%	0	0.00%	0.00%
Other West Germanic languages	26	100.00%	0	0.00%	26	0.02%	0.00%
Scandinavian languages	37	100.00%	0	0.00%	37	0.03%	0.00%



Greek	26	100.00%	0	0.00%	26	0.02%	0.00%
Russian	0	0.00%	11	100.00%	11	0.01%	0.01%
Polish	34	100.00%	0	0.00%	34	0.03%	0.00%
Serbo-Croatian	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Slavic languages	0	0.00%	6	100.00%	6	0.00%	0.00%
Armenian	0	0.00%	0	0.00%	0	0.00%	0.00%
Persian	7	100.00%	0	0.00%	7	0.01%	0.00%
Gujarati	0	0.00%	0	0.00%	0	0.00%	0.00%
Hindi	15	100.00%	0	0.00%	15	0.01%	0.00%
Urdu	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Indic languages	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Indo-European languages	7	46.67%	8	53.33%	15	0.01%	0.01%
Chinese	113	41.85%	157	58.15%	270	0.20%	0.12%
Japanese	11	42.31%	15	57.69%	26	0.02%	0.01%
Korean	14	100.00%	0	0.00%	14	0.01%	0.00%
Mon-Khmer, Cambodian	0	0.00%	0	0.00%	0	0.00%	0.00%
Hmong	0	0.00%	0	0.00%	0	0.00%	0.00%
Thai	0	0.00%	6	100.00%	6	0.00%	0.00%
Laotian	0	0.00%	0	0.00%	0	0.00%	0.00%
Vietnamese	90	64.75%	49	35.25%	139	0.10%	0.04%
Other Asian languages	102	86.44%	16	13.56%	118	0.09%	0.01%
Tagalog	46	90.20%	5	9.80%	51	0.04%	0.00%
Other Pacific Island languages	0	0.00%	18	100.00%	18	0.01%	0.01%
Navajo	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Native North American	0	0.00%	0	0.00%	0	0.00%	0.00%
Hungarian	19	100.00%	0	0.00%	19	0.01%	0.00%
Arabic	20	100.00%	0	0.00%	20	0.01%	0.00%
Hebrew	0	0.00%	0	0.00%	0	0.00%	0.00%
African languages	82	71.93%	32	28.07%	114	0.08%	0.02%
Other and unspecified languages	0	0.00%	0	0.00%	0	0.00%	0.00%
LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER Survey/Program: American Community Survey Universe: Population 5 years and over Year: 2015 Estimates: 5-Year Table ID: B16001							
US Census Tracts: 2104, 2105, 2106, 2107, 2108, 2123, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2217, 2220, 2304, 2305, 2317, 5103, 5114, 5115, 5116, 5303, 5304, 5305, 5306, 5307							

*(c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice*

The District has not monitored the literacy rates of LEP populations in their native languages; however, the District provides both written and spoken translations in order to serve the LEP population effectively. The District will continue to provide written translations in Spanish but will document when requested to translate information orally. Requests for oral translations in any languages will be documented as well.

*(d) Whether LEP persons are underserved by the recipient due to language barriers*

Presently, there are no known language barriers that cause LEP persons to be underserved. The District will notify LEP persons of their rights and will monitor complaints about barriers.

*Factor 2: Assessing the Frequency with Which LEP Individuals Come into Contact with your programs, activities, and services*

The District does not provide transit services, but rather utilizes FTA funds in order to develop pedestrian infrastructure that enhances people’s ability to easily access the transit services provided by Houston METRO. So, the most likely instances that LEP persons would come in contact with the projects conducted by the District is during procurement or construction. The District makes the fact known during all procurement endeavors, advertising efforts, public

meetings and other instances that documents, instructions, and other important materials can be translated at no cost to the user. Very rarely does any of the construction require any detours or significant changes to accessing public transportation, so there is minimal disruption for transit users. In the instance where there are disruptions, the District works with Houston METRO to address any concerns while keeping LEP persons in mind. No translations have been requested in the past three (3) years. All vital documents, such as forms and public notices, are translated into Spanish.

*Factor 3: Assessing the Nature and Importance of Program, Activity or Service*

As stated in the Factor 2 analysis, the District does not provide transit services but does utilize FTA funds for the construction of pedestrian infrastructure. The construction of sidewalks, ADA ramps, pedestrian lighting and signalization provides benefit to all users of transit services but does not have any unique impact on LEP persons. The District can translate all important documents and instructions in Spanish and any other language upon request. The District has no direct control or decision making of the transit services within the district.

*Factor 4: Assessing the Resources Available to Transit and Costs*

The District offers many opportunities for LEP persons to fully access information regarding the construction projects. The District staff can proficiently translate oral conversations as well as written documentation from English to Spanish, or vice versa. All vital information, including public notices of programs, meetings, and contracting opportunities as well as any construction delay or detour notices, will be translated into Spanish. The District recognizes that non-Spanish speaking LEP persons also live within the district. The District does not anticipate many other translation requests, but will accommodate any request, if needed. Costs from any requested translations (either due to staff time or other translation services) and printing of translated documents might range from \$500 to \$1,500 a year. All costs are absorbed into the District's annual budget.

**LAP IMPLEMENTATION PLAN**

*Task 1 – Identifying LEP Persons Who Need Language Assistance*

*Number or Proportion of LEP Persons Served or Encountered in Eligible Service Population*

According to the American Community Survey 2015, there is 37.4% of the District population (all US Census Tracts that have a portion within the District boundaries) who speak English “less than well” that speak a language other than English at home. The percentage of Spanish-speaking individuals who report speaking English “less than well” is 37.1% of the total management district population, which meets the Safe Harbor threshold of 1,000 individuals or 5% of the population.

2015 American Community Survey Data							
Greater Northside Management District							
Limited English Proficiency							
Language Spoken at Home	Speak English "very well"		Speak English "less than well"		Total		
	Number "very well"	Percent	Number "less than well"	Percent	Total Number	Percent of Total Language Sub-Group	Speaking Less than Well Percent of Total Population
<b>Total population</b>					135,085		
Speak only English					47,831	35.41%	
Spanish or Spanish Creole	35,781	41.63%	50,166	58.37%	85,947	63.62%	37.14%
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Italian	22	100.00%	0	0.00%	22	0.02%	0.00%
Portuguese or Portuguese Creole	0	0.00%	0	0.00%	0	0.00%	0.00%
German	85	69.11%	38	30.89%	123	0.09%	0.03%
Yiddish	0	0.00%	0	0.00%	0	0.00%	0.00%
Other West Germanic languages	26	100.00%	0	0.00%	26	0.02%	0.00%
Scandinavian languages	37	100.00%	0	0.00%	37	0.03%	0.00%
Greek	26	100.00%	0	0.00%	26	0.02%	0.00%
Russian	0	0.00%	11	100.00%	11	0.01%	0.01%
Polish	34	100.00%	0	0.00%	34	0.03%	0.00%
Serbo-Croatian	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Slavic languages	0	0.00%	6	100.00%	6	0.00%	0.00%
Armenian	0	0.00%	0	0.00%	0	0.00%	0.00%
Persian	7	100.00%	0	0.00%	7	0.01%	0.00%
Gujarati	0	0.00%	0	0.00%	0	0.00%	0.00%
Hindi	15	100.00%	0	0.00%	15	0.01%	0.00%
Urdu	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Indic languages	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Indo-European languages	7	46.67%	8	53.33%	15	0.01%	0.01%
Chinese	113	41.85%	157	58.15%	270	0.20%	0.12%
Japanese	11	42.31%	15	57.69%	26	0.02%	0.01%
Korean	14	100.00%	0	0.00%	14	0.01%	0.00%
Mon-Khmer, Cambodian	0	0.00%	0	0.00%	0	0.00%	0.00%
Hmong	0	0.00%	0	0.00%	0	0.00%	0.00%
Thai	0	0.00%	6	100.00%	6	0.00%	0.00%
Laotian	0	0.00%	0	0.00%	0	0.00%	0.00%
Vietnamese	90	64.75%	49	35.25%	139	0.10%	0.04%
Other Asian languages	102	86.44%	16	13.56%	118	0.09%	0.01%
Tagalog	46	90.20%	5	9.80%	51	0.04%	0.00%
Other Pacific Island languages	0	0.00%	18	100.00%	18	0.01%	0.01%
Navajo	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Native North American	0	0.00%	0	0.00%	0	0.00%	0.00%
Hungarian	19	100.00%	0	0.00%	19	0.01%	0.00%
Arabic	20	100.00%	0	0.00%	20	0.01%	0.00%
Hebrew	0	0.00%	0	0.00%	0	0.00%	0.00%
African languages	82	71.93%	32	28.07%	114	0.08%	0.02%
Other and unspecified languages	0	0.00%	0	0.00%	0	0.00%	0.00%

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER Survey/Program: American Community Survey Universe: Population 5 years and over Year: 2015 Estimates: 5-Year Table ID: B16001

US Census Tracts: 2104, 2105, 2106, 2107, 2108, 2123, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2217, 2220, 2304, 2305, 2317, 5103, 5114, 5115, 5116, 5303, 5304, 5305, 5306, 5307

*Frequency with Which LEP Individuals Come Into Contact with your Programs, Activities and Services*

The District does not provide transit services, but rather utilizes FTA funds in order to develop pedestrian infrastructure that enhances people’s ability to easily access the transit services provided by Houston METRO. So, the most likely instances that LEP persons would come in contact with the projects conducted by the District is during procurement or construction. The

District makes the fact known during all procurement endeavors, advertising efforts, public meetings, and other instances that documents, instructions and other important materials can be translated at no cost to the user. Very rarely does any of the construction require any detours or significant changes to accessing public transportation, so there is minimal disruption for transit users. In the instance where there are disruptions, the District works with Houston METRO to address any concerns while keeping LEP persons in mind.

### *Task 2 - Language Assistance Measures*

The District will provide for a range of language assistance options, including notices to LEP person in a language they can understand regarding their right to free language assistance.

The District will provide translation services for public documents and competent interpreters at public hearings as requested.

The District will make best efforts to increase opportunities for public involvement, particularly by historically underserved populations including LEP individuals by publishing notices of public meetings in as many varied mediums as possible, including social, print, and local minority newspaper. The District will also distribute multi lingual flyers.

### *Specific Activities for Limited English Proficiency Individuals*

The District has adopted the following policy regarding language assistance for federally funded programs:

- A. There will be at least one Spanish-speaking employee at every public contact event when such a request is made in advance of meeting.
- B. The District will ensure that if at any time an employee or an appointed substitute is not available to provide language assistance, the District will contract with outside agency to assist with translation for languages other than Spanish upon advance request.
- C. Employment opportunities on federally funded programs will be advertised in multiple languages, including English and Spanish.
- D. The District will publish informational brochures, flyers, etc., regarding the District federally funded programs are written in English and Spanish and may be translated to other languages upon request. The District does not operate any type of transit services. The District's federal program is limited to implementing transit capital improvements.
- E. American Sign Language interpreters will be available for face to face meetings with the District staff regarding Federally Funded Programs upon advance request.

### *Task 3 – Providing Notice to LEP Persons*

The Title VI Notice to the Public will be posted at the District offices and on the website. The Title VI Notice to the Public has included a statement about translation availability at no cost and the full notice has been translated into Spanish.

### *Task 4 – Monitoring and Evaluating Language Access Plan*

The District will monitor the program to ensure that LEP persons have meaningful access to the transportation planning and implementation process. The District will document interactions with LEP individuals in field activities and community meetings, including follow-up responses, in an internal log that includes the date, the requested language, and the actions taken to accommodate the request. Sign-in sheets for community meetings will request language preference. The Language Access Plan will be updated every three years.

*Task 5 – Training Staff*

The District will provide training for staff to ensure they are knowledgeable and aware of LEP policies and procedures, the District Title VI Program and are trained to work effectively in the facilitation of the process. All new staff members will be informed of the Title VI Program and all language assistance measure the District employees are required to perform.

**Minority Representation on Planning and Advisory Boards**

The District has a Board of Directors comprised commercial property owners or their agents that are assessed by the District. It is important to the District to have a diverse board that represents all areas of the District and represents a diverse cultural and racial population. Currently, the Board is comprised of 10 members of which four (4) are White, two (2) are African-American, one is Asian-American, and three (3) are Hispanic.

	White	Hispanic	African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Other
<b>US Census Population</b>	12.5%	73.9%	12.1%	0.2%	0.7%	0.1%	0.5%
<b>Board of Directors</b>	40.0%	30.0%	20.0%	0.0%	10.0%	0.0%	0.0%

**Monitoring of Sub Recipients**

The District does not have any sub recipients who receive federal financial assistance.

**Determination of Site or Location of Facilities**

No facilities have been constructed within the District in the past three years. Any construction of transit facilities receiving federal financial assistance within the District will perform a Title VI site equity analysis during the planning stage with regard to the location of the facility.

**Chapter IV-4: Requirement to Set System-Wide Service Standards and Policies Service Standards**

The District does not provide fixed-route transit services.

**Attachment A - Civil Rights Complaint Form**

The Greater Northside Management District (“District”) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, or disability, as provided by Title VI of the Civil Rights Act of 1964 and the American with Disabilities Act (ADA), as amended. Civil Rights complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Civil Rights Coordinator by calling 713-229-0900. The completed form must be returned to Civil Rights Coordinator, 5305 Irvington Blvd., Houston, Texas 77009.

Your Name:	Phone:
Street Address:	Email:
	City, State & Zip Code:
Person(s) discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State & Zip Code:	

Which of the following best describes the reason for the alleged discrimination took place?

- Race
- Color
- National Origin
- Limited English Proficiency
- Disability (ADA)
- Other

Date of Incident: \_\_\_\_\_

Name/ID of Individuals Involved: \_\_\_\_\_

Vehicle ID/Route Name: \_\_\_\_\_

Please describe the alleged discrimination incident. Provide the names and title of all District employees involved if available. Explained what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

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Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No If so, list agency / agencies and contact information below:

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_  
Street Address, City, State & Zip Code: \_\_\_\_\_ Phone \_\_\_\_\_

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_  
Street Address, City, State & Zip Code: \_\_\_\_\_ Phone \_\_\_\_\_

Complainants Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
\_\_\_\_\_

Print or Type Name of Complainant

Date Received:
Review By:

## **Formulario de Quejas de Derechos Civiles**

El Distrito Administrativo de Greater Northside (Distrito) está comprometida a garantizar que ninguna persona sea excluida de participar o se le sean negados los beneficios de sus servicios sobre la base de raza, color, origen nacional u discapacidad, conforme a lo dispuesto por el Título VI del Acta de Derechos Civiles de 1964 y Americans with Disabilities Act (ADA). Las quejas conforme al Derechos Civiles deben ser presentadas dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor póngase en contacto con el Administrador de Derechos Civiles llamando al 936-522-3526. El formulario completo deberá ser devuelto a la siguiente dirección: Administrador de Derechos Civiles, 5305 Irvington Blvd., Houston, Texas 77009.

Nombre:	Teléfono:
Dirección residencial:	Teléfono Alternativo:
	Ciudad, Estado, y Código Postal:
Persona(s) contra la(s) que se discriminó (si no se trata de la persona que presenta la queja):	
Dirección residencial, Ciudad, Estado, y Código Postal:	

¿Cuál de los siguientes casos describe mejor la razón de la presunta discriminación?

- |                                |   |   |
|--------------------------------|---|---|
| <input type="checkbox"/> Raza  | <input type="checkbox"/> Origen nacional                  | <input type="checkbox"/> Discapacidad (ADA) |
| <input type="checkbox"/> Color | <input type="checkbox"/> Conocimiento limitado del inglés | <input type="checkbox"/> Otro               |

Fecha del incidente: \_\_\_\_\_

Nombre/ID of individuos involucrados: \_\_\_\_\_

Identificación del vehículo/Nombre de la ruta: \_\_\_\_\_

Por favor describa el presunto incidente discriminatorio. Proporcione los nombres y puestos de todos los empleados del Distrito que estuvieron involucrados, si están disponibles. Explique lo que fue lo que sucedió y quién considera que fue responsable. Por favor use el reverso de este formulario si requiere espacio adicional.

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**Attachment B – Board of Directors Approval of Title VI Program**

RESOLUTION ADOPTING A TITLE VI COMPLIANCE PLAN FOR THE GREATER NORTHSIDE  
MANAGEMENT DISTRICT

WHEREAS, on May 8, 2020, the District adopted a Title VI Compliance Plan in accordance with 49 CFR Part 21;

WHEREAS, the proposed Title VI Compliance Plan attached hereto is intended to meet such requirements; and

WHEREAS, the District desires to submit the Title VI Compliance Plan to the FTA for review and approval by those agencies or their representatives prior to final implementation:

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE GREATER NORTHSIDE MANAGEMENT DISTRICT THAT:

Section 1. The District hereby approves the Title VI Compliance Plan attached hereto as Exhibit A which plan shall be submitted for review and approval by the FTA or such other agencies as required.

Section 2. The Title VI Compliance Plan shall be administered and enforced by the officers, agents and employees of the District in accordance with the terms set forth therein.

Section 3. This resolution shall be effective immediately upon adoption.

PASSED AND APPROVED this the 8th day of May 2020.

\_\_\_\_\_  
Chairman Board of Directors

ATTEST:

\_\_\_\_\_  
Secretary, Board of Directors

(SEAL)

## Attachment C – Procedimientos de Queja y Formulario de Queja

Estos procedimientos cubren todas las quejas presentadas conforme al Título VI de la Ley de Derechos Civiles de 1964, según enmendada, en relación con cualquier transporte, programa o actividad que reciba asistencia financiera federal administrada por el Distrito o subcontratantes y contratistas. El programa también se lleva a cabo de acuerdo con la Circular 4702.1B y la Circular 4710.1 de FTA. El formulario de queja del Distrito se encuentra en el Apéndice A.

Se hará todo lo posible para obtener una resolución temprana de las quejas. El Coordinador del Título VI hará todo lo posible para buscar una resolución de la queja. Las entrevistas iniciales con el reclamante y el demandado solicitarán información con respecto a las oportunidades de remedio y solución específicamente solicitadas.

Cualquier persona, grupo de personas o entidad que crea que ha sido víctima de discriminación por motivos de raza, color u origen nacional—tal como lo prohíben las disposiciones del Distrito de no discriminación del Título VI—puede presentar una queja por escrito. Una queja formal se debe presentar dentro de los 180 días posteriores a la supuesta ocurrencia, o cuando la supuesta discriminación fue conocida por el reclamante. Estos procedimientos son parte de un proceso administrativo, que no proporciona remedios que incluyen daños punitivos o remuneraciones compensatorias para el demandante.

La queja será tratada de la siguiente manera:

1. Deber ser por escrito y firmado por el denunciante(s).
2. Presentar la fecha del presunto acto de discriminación (fecha en que los reclamantes tuvieron conocimiento de la supuesta discriminación; o la fecha en que se interrumpió esa conducta; o la última instancia de la conducta).
3. Presentar una descripción detallada de los problemas, incluyendo los nombres y títulos de trabajo de todas las partes involucradas en la queja.

Las acusaciones o alegaciones recibidas por fax o correo electrónico serán reconocidas y procesadas siempre y cuando la(s) identidad(es) del (de los) reclamante(s) y la intención de queja sean firmadas por el (los) reclamante(s). Se requiere que el demandante envíe por correo una copia original firmada del fax o transmisión por correo electrónico al Distrito para que el Distrito pueda procesarlo. Toda la correspondencia con el Distrito debe dirigirse al Director Ejecutivo y debe tener "Attn: FTA Compliance" en el exterior. Las acusaciones o alegaciones recibidas por teléfono serán escritas y provistas al reclamante para ser confirmadas o revisadas antes de ser procesadas. El reclamante recibirá un formulario de queja que deberá ser completada, firmada y devuelta al Distrito para ser procesada.

La aceptación de una queja dependerá de los siguientes factores:

1. Si la queja es presentada a tiempo;
2. Si las alegaciones involucran una queja del Título VI de raza, color u origen nacional; o

3. Si las alegaciones involucran un programa o actividad de un receptor, subreceptor o contratista de ayuda federal o, en el caso de las alegaciones de ADA, una entidad abierta al público.

Una queja puede ser desestimada por las siguientes razones:

1. El reclamante solicita el retiro de la queja; o
2. El reclamante no responde a las repetidas solicitudes de proveer información adicional necesarias para procesar la queja; o
3. El reclamante no puede ser localizado después de varios intentos.

Los procedimientos no niegan el derecho del reclamante a presentar quejas formales con otras agencias estatales o federales ni a buscar un abogado privado para las quejas que aleguen discriminación. El Distrito tiene autoridad para aceptar quejas de investigación, pero los denunciadores también pueden presentar quejas ante TxDOT o la Administración Federal de Tránsito (FTA) dentro de los 180 días posteriores al presunto delito. Si desea presentar una queja con TxDOT, envíe la queja por escrito a TxDOT Public Transportation, 3712 Jackson Avenue, Building 6, 5th floor, Austin, Texas 78731. Si desea presentar una queja con FTA, envíe la queja por escrito al FTA Región VI, 819 Taylor Street, habitación 8A36, Fort Worth, TX 76102.

Una vez que el Distrito decida proceder con la investigación, se le notificará por escrito al demandante la determinación dentro de diez (10) días calendarios. El Director Ejecutivo y el presidente / la presidenta del consejo de administración determinarán la decisión final de proceder. Se le asignará un número de caso a la queja y se registrará en los registros del Distrito identificando su razón de ser (raza, color, u origen nacional) y el presunto daño causado.

En los casos en que el Distrito asuma la investigación de la denuncia el Coordinador del Derechos Civiles le brindará al demandante la oportunidad de responder a las alegaciones por escrito. El demandante tendrá diez (10) días calendarios a partir de la fecha en la que el Distrito le notificó la aceptación de la queja, para proporcionar su respuesta a las alegaciones.

Dentro de los 30 días calendarios de la aceptación de la queja, el Coordinador del Derechos Civiles preparará un informe de investigación para el presidente/la presidenta del consejo de administración. El informe incluirá una descripción narrativa del incidente, identificación de las personas entrevistadas, hallazgos y recomendaciones para la disposición. El presidente/la presidenta del consejo de administración tendrá diez (10) días calendarios para evaluar y proporcionar comentarios.

Después de que el Coordinador del Derechos Civiles aborde cualquier comentario del presidente/ la presidenta del consejo de administración sobre el informe de investigación preliminar, el informe y sus conclusiones serán remitidas al personal legal del Distrito para su revisión. El personal legal revisará el informe y la documentación asociada y proporcionará su opinión dentro de diez (10) días calendario.

El informe de investigación final del Distrito y una copia de la queja serán enviadas a FTA dentro de los 60 días calendarios posteriores a la aceptación de la queja. El Distrito notificara a las partes sobre sus conclusiones preliminares.