

RESOLUTION ADOPTING A TITLE VI COMPLIANCE PLAN FOR THE MIDTOWN MANAGEMENT DISTRICT

WHEREAS, on August 06, 2025, Midtown 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, Midtown 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 MIDTOWN MANAGEMENT DISTRICT THAT:

Section 1. Midtown hereby approves the Title VI Compliance Plan attached hereto 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 Midtown in accordance with the terms set forth therein.

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

PASSED AND APPROVED this the 6th day of August, 2025.

Signed by:

48B3518D5CF447E

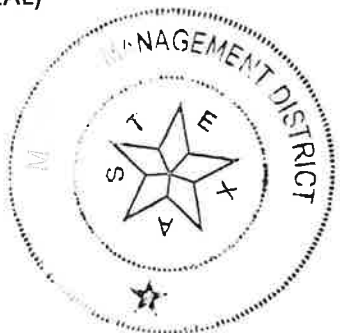
Chairman Board of Directors

ATTEST:

DocuSigned by:
Christopher Johnston

3C872C1C8AC343F...

Assistant Secretary, Board of Directors
(SEAL)





midtown
H O U S T O N

MIDTOWN MANAGEMENT DISTRICT
TITLE VI PROGRAM
CIVIL RIGHTS ACT OF 1964

AUGUST 2025

Contents

Policy Statement	2
Authorities	2
Title VI Procedures.....	3
Requirement to Notify Beneficiaries of Protection Under Title VI	3
Requirement to Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits.....	7
Promoting Inclusive Public Participation	7
Language Assistance Plan (LAP) Implementation Plan	14
Minority Representation on Planning and Advisory Bodies	16
Monitoring Subrecipients	16
Determination of Site or Location of Facilities	16
Requirement to Set System-Wide Service Standards and Policies.....	16
Appendix A – Title VI Complaint Form	17
Appendix B – Procedimientos de Queja y Formulario de Queja	21

POLICY STATEMENT

The Midtown Management District (d.b.a. Midtown) 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, 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. Midtown's responsibilities in its commitment to non-discrimination, including:

- Ensuring equal and meaningful access to all federally funded programs.
- Promoting full and fair participation in transportation-based decision making.
- Providing clear communication to all residents including persons with limited English proficiency.

Midtown's Title VI Coordinator or equivalent is responsible for initiating and monitoring Title VI activities, assuring the preparation of required reports.

AUTHORITIES

Title VI of the 1964 Civil Rights Act provides that no 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 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).

Signed by:



4B65A8AC46EB4E8...

Matt Thibodeaux
Executive Director
Midtown Management District

8/8/2025

Date

TITLE VI PROCEDURES

Midtown developed this Title VI Program to address the requirements of the FTA Circular 4702.1B, Title VI Requirements and Guidelines for FTA Recipients. Midtown 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.

Midtown's Board of Directors reviewed and approved the Title VI Program. A copy of the resolution approving the program is included at the beginning of this documentation.

REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

Midtown will post the following notice to the public at the Midtown offices and on the Midtown website. Since Houston Metro runs the transit system, the Houston Metro Title VI notice is listed on the transit stops and buses.

The Midtown Management District hereby gives public notice that it is the Midtown'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 Midtown. Any such complaint must be in writing or by phone and filed with the Midtown Title VI 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 713-526-7577. Individuals may get more information about the Title VI Program by calling 713-526-7577 or by messaging Midtown at <https://midtownhouston.com/contact/>.

If you would like to file with Federal Transit Administration (FTA) Regional Office, please send a written complaint to FTA Region VI, 819 Taylor Street, Room 14A02, Fort Worth, TX 76102. A complainant may also file a complaint directly with the FTA by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If you like more information on Title VI, please visit the Midtown website (<https://midtownhouston.com>) or contact Midtown via phone 713-526-7577, via email to <https://midtownhouston.com/contact/>, or via mail to: 410 Pierce Street, Suite 355, Houston, TX 77002. This notice is to be posted in the offices of the Midtown Management District, on the Midtown website (<https://midtownhouston.com/>) and at other strategic locations throughout Midtown.

Midtown 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 Midtown at 713-526-7577.

Título VI Aviso Público

Por medio de la presente, el Distrito Administrativo de Midtown (Midtown) 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 (Midtown). Las quejas pueden hacerse por escrito o por teléfono. Estas deben ser presentadas ante el Coordinador del Título VI de Midtown 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 713-526-7577. Las personas pueden obtener más información sobre el Programa Título VI llamando al 713-526-7577 o por mensajería en Midtown <http://houstonmidtown.com/press/contact>.

Si desea presentar una queja ante la Oficina Regional de la Administración Federal de Tránsito (FTA), envíe una queja por escrito a FTA Region VI, 819 Taylor Street, Room 14A02, Fort Worth, TX 76102. Un denunciante también puede presentar una queja directamente con el FTA presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Para obtener más información acerca del Título VI, visite nuestra página web (<http://houstonmidtown.com>), llámenos al teléfono 713-526-7577, escríbanos por correo electrónico a través del siguiente link (<http://houstonmidtown.com/press/contact>), o envíenos un correo postal: 410 Pierce Street, suite 355, Houston, TX 77002. Este aviso será publicado en las oficinas, en la página web (<http://houstonmidtown.com>) y en otros lugares estratégicos a lo largo del Distrito (Midtown).

Midtown 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 Midtown a 713-526-7577.

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, relating to any transportation or program or activity receiving federal financial assistance administered by Midtown or sub-recipients and contractors. The program is also conducted in accordance with FTA C 4702.1B. Midtown's Compliant Form is provided in Appendix A.

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. Midtown 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 Texas Department of Transportation, ATTN: Civil Rights Division, 125 E. 11th Street, Austin, TX 78701. If you would like to file with FTA, please send a written complaint to FTA Region VI, 819 Taylor Street, Room 14A02, Fort Worth, TX 76102.

Complaints or compliments can be filed to the ADA Coordinator in person at 410 Pierce Street, Suite 355, Houston, TX 77002, in writing to 410 Pierce Street, Suite 355, Houston, TX 77002, by email at <https://midtownhouston.com/contact/>, or by calling 713-526-7577, 8:00 a.m. to 5:00 p.m., Monday through Friday. The complainant also has the right to formally file a complaint through the following process. The Title VI 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.

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.

PROCEDURES

Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin, as prohibited by Title VI nondiscrimination provisions by Midtown, may file a written complaint. A formal complaint must be filed within 180 calendar days of the alleged occurrence, or when the alleged discrimination became known to the complainant.

The complainant must meet the following requirements:

- a. In writing;
- b. Signed;
- c. Dated for the alleged act of discrimination; and
- d. Contain a detailed description of the issues including name(s) and job(s).

Allegations received by fax, e-mail or 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 Midtown for processing.

A complaint will be accepted based on the following:

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

- a. Complainant requests the withdrawal of the complaint;
- b. Complainant fails to respond to repeated requests for additional information needed to process complaint; or
- c. Complainant cannot be located after reasonable attempts.

Once Midtown has all of the documentation associated with the investigation, the complainant will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a case number and then be logged into Midtown's records identifying its basis (race, color, or national origin) and alleged harm.

Within 40 calendar days of the acceptance of the complaint, an investigative report will be prepared by the Title VI Coordinator. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.

The Title VI Coordinator will forward the report to Midtown's legal counsel for review.

The legal counsel will review the report and associated documentation and will provide input within 10 calendar days with the Title VI Coordinator and have any modifications implemented as needed.

Midtown's final investigative report and a copy of the complaint will be forwarded to FTA within 60 calendar days of the acceptance of the complaint. Midtown will notify the parties of its preliminary 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.

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

PROMOTING INCLUSIVE PUBLIC PARTICIPATION

Midtown maintains a public participation process for all construction projects. The Board of Directors meetings are all open to the public and once every quarter the meetings are held in the evening to ensure a greater chance for involvement from concerned stakeholders. Notices of these meetings can be made in Spanish, as stated on the notice. Midtown also has bilingual staff at the meetings to translate upon request. The projects are discussed in detail at the public meetings which occur before construction begins. Oral comments can be translated as necessary. Midtown utilizes multiple media outlets to advertise important meetings such as newspapers, mailers, website notices and other means.

Midtown utilizes multiple media outlets, including the Houston Chronicle, to advertise important meetings such as newspapers, mailers, website notices and other means. Midtown keeps up a blog on their website with current events and news as well as the seasonal newsletter called the Midtown Buzz.



[about](#) [visit + explore](#) [organizations](#) [our work](#) [residents](#) [Q](#)

BLOGS



A Guide on How to Spend Your Summer Day in Midtown: Coffee, Culture, and Cocktails

Summer in Houston is the perfect time to rediscover Midtown Houston, one of the city's most walkable neighborhoods and a hub for creativity, culture, and community. Whether you're exploring a new coffee shop, planning an afternoon out, or looking for a place to enjoy dinner and drinks, Midtown offers a full day's worth of experiences for both visitors and residents.

[READ MORE](#)



Your Guide to a Safer Summer in Midtown Houston: Community Tips & Resources

As summer kicks off and Midtown Houston fills with visitors, community events, and outdoor fun, it's the perfect time to refresh your safety game plan. Whether you're enjoying an evening in Bagby Park, attending a community event, or heading out of town for vacation, these simple steps can help keep you, your home, and your vehicle secure.

[READ MORE](#)



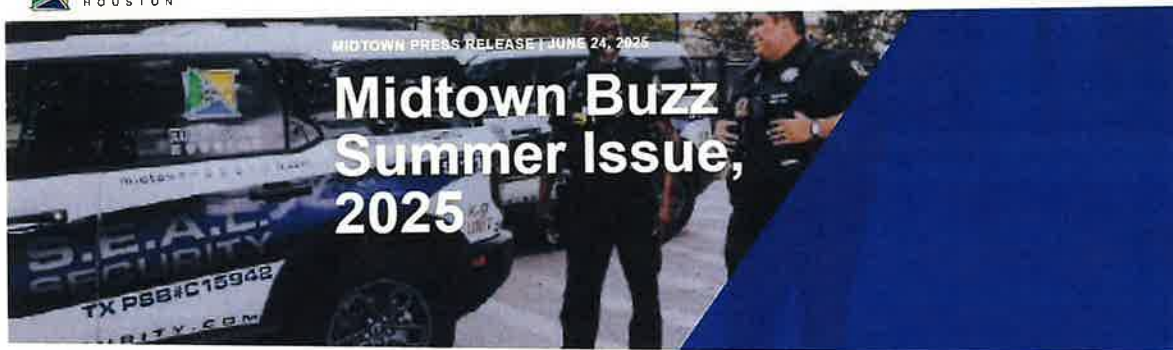
Free & Fun : July in Midtown

July in Midtown Houston means long sunny days, cool community vibes, and exciting ways to enjoy the city. Whether you're looking to chill out with yoga, groove to a summer movie, or dance at Houston's hottest new day party, Midtown's public spaces have you covered.

[READ MORE](#)



[about](#) [visit + explore](#) [organizations](#) [our work](#) [residents](#) [Q](#)

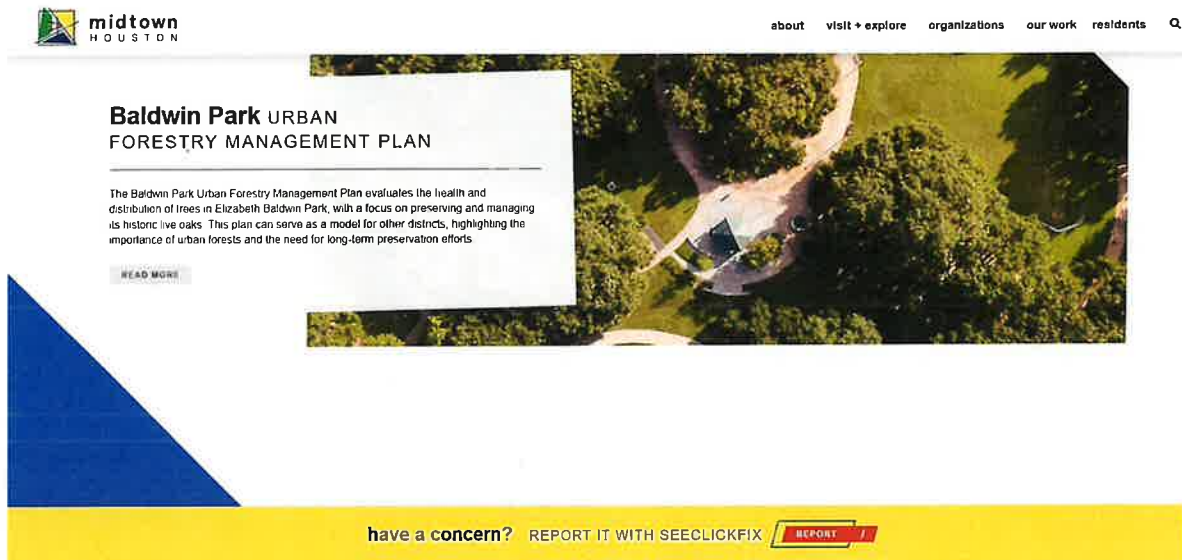


SAFER STREETS, STRONGER COMMUNITY: MIDTOWN CRIME DROPS AS POPULATION GROWS

As Midtown Houston welcomes more residents, businesses, and visitors at an unprecedented rate, public safety remains a core service area. We're listening and taking action to create programs that enhance security and respond to the concerns of business owners, residents, and visitors. Your input has been invaluable in shaping our approach.

Despite steady population growth, crime has decreased 23% since 2019—a clear sign that Midtown's investments in modern safety infrastructure and responsive programming are working. Backed by innovative

Midtown provides full plans on the website as well. The website has access to the Parks and Public Space Master Plan, Houston Affordable Housing Plan, Cultural Arts Master Plan, and Baldwin Park Urban Forestry Management Plan for the public review. The Plans page also has a link to provide feedback to Midtown.



All Midtown construction projects will go through the Houston-Galveston Area Council (H-GAC) Transportation Improvement Program (TIP), which involves more public participation. In the H-GAC Public Involvement Plan, it states that, "H-GAC currently provides some materials in Spanish such as factsheets and web content. H-GAC also has several experienced staff members who are fluent in both Spanish and English."

Midtown provides updates through social media including Facebook, X/Twitter, Youtube, Instagram, and Tiktok. Events and news items are posted on the page and open to the public. Midtown allows the community to provide communication to the district through these social media outlets.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LIMITED ENGLISH PROFICIENCY (LEP) PERSONS

MIDTOWN 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 Midtown 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

The best, most comprehensive table to identify Limited English Proficiency levels by their population is the American Community Survey of Language Spoken at Home by Ability to Speak English (Table B16001); however, this table has not been updated since 2015. Midtown decided to continue to use this table along with other tables that have more up to date information. For this data, Midtown's population is considered all US Census Tracts that have a portion within Midtown boundaries.

According to the American Community Survey 2015 5-Year data, there is 5.8 percent of the transit service area population who speak English "less than well" that speak a language other than English at home. Midtown used all US Census tracts that contain any portion of the management district boundary. The percentage of Spanish-speaking individuals who reported speaking English "less than well" is 3.0 percent or 963 individuals of the total management district population.

2015 American Community Survey Data							
Midtown Management District							
Limited English Proficiency							
Language Spoken at Home	Speak English "very well"		Speak English "less than well"		Total		
	Number "very well"	%	Number "less than well"	%	Total	% of Total Language Group	% of Speaking Less Than Well of Total Population
Total population					31,790		
Speak only English					24,987	78.6%	
Spanish or Spanish Creole	2,370	71.1%	963	28.9%	3,333	10.5%	3.0%
French (incl. Patois, Cajun)	244	81.1%	57	18.9%	301	0.9%	0.2%
French Creole	0	0.0%	0	0.0%	0	0.0%	0.0%
Italian	124	68.9%	56	31.1%	180	0.6%	0.2%
Portuguese or Portuguese Creole	108	61.4%	68	38.6%	176	0.6%	0.2%
German	209	90.9%	21	9.1%	230	0.7%	0.1%
Yiddish	0	0.0%	0	0.0%	0	0.0%	0.0%
Other West Germanic languages	90	100.0%	0	0.0%	90	0.3%	0.0%
Scandinavian languages	16	100.0%	0	0.0%	16	0.1%	0.0%
Greek	19	50.0%	19	50.0%	38	0.1%	0.1%
Russian	66	72.5%	25	27.5%	91	0.3%	0.1%
Polish	78	90.7%	8	9.3%	86	0.3%	0.0%
Serbo-Croatian	56	100.0%	0	0.0%	56	0.2%	0.0%
Other Slavic languages	11	100.0%	0	0.0%	11	0.0%	0.0%
Armenian	0	0.0%	0	0.0%	0	0.0%	0.0%
Persian	40	62.5%	24	37.5%	64	0.2%	0.1%
Gujarati	128	90.1%	14	9.9%	142	0.4%	0.0%
Hindi	156	88.6%	20	11.4%	176	0.6%	0.1%
Urdu	56	87.5%	8	12.5%	64	0.2%	0.0%
Other Indic languages	102	46.4%	118	53.6%	220	0.7%	0.4%
Other Indo-European languages	0	0.0%	41	100.0%	41	0.1%	0.1%
Chinese	436	84.5%	80	15.5%	516	1.6%	0.3%
Japanese	69	46.3%	80	53.7%	149	0.5%	0.3%
Korean	16	64.0%	9	36.0%	25	0.1%	0.0%
Mon-Khmer, Cambodian	0	0.0%	41	100.0%	41	0.1%	0.1%

Hmong	0	0.0%	0	0.0%	0	0.0%	0.0%
Thai	0	0.0%	0	0.0%	0	0.0%	0.0%
Laotian	0	0.0%	0	0.0%	0	0.0%	0.0%
Vietnamese	114	54.3%	96	45.7%	210	0.7%	0.3%
Other Asian languages	88	57.5%	65	42.5%	153	0.5%	0.2%
Tagalog	100	86.2%	16	13.8%	116	0.4%	0.1%
Other Pacific Island languages	74	100.0%	0	0.0%	74	0.2%	0.0%
Navajo	0	0.0%	0	0.0%	0	0.0%	0.0%
Other Native North American	0	0.0%	0	0.0%	0	0.0%	0.0%
Hungarian	0	0.0%	0	0.0%	0	0.0%	0.0%
Arabic	120	100.0%	0	0.0%	120	0.4%	0.0%
Hebrew	58	100.0%	0	0.0%	58	0.2%	0.0%
African languages	10	100.0%	0	0.0%	10	0.0%	0.0%
Other and unspecified languages	16	100.0%	0	0.0%	16	0.1%	0.0%

Source: U.S. Census Bureau, 2015 American Community Survey 5-Year Estimates
B16001 :Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over
Census Tracts – Census Tract 3125, Harris County, Texas; Census Tract 3126, Harris County, Texas; Census Tract 4101, Harris County, Texas; Census Tract 4105, Harris County, Texas; Census Tract 4106, Harris County, Texas; Census Tract 4107.01, Harris County, Texas; Census Tract 4107.02, Harris County, Texas; Census Tract 4119, Harris County, Texas
https://www2.census.gov/programs-surveys/acs/summary_file/2015/data/

Table C16001, Language Spoken at Home, provides similar information with fewer languages identified. The breakdown is similar to the above table. The percentage of Spanish-speaking individuals who report speaking English “less than well” is 1.55% of the Midtown Management District, which does not meet the Safe Harbor threshold. No languages met the Safe Harbor threshold based on this table.

LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER					
Language Spoken at Home	Speak English "very well"	Speak English "less than well"	Total Number	Percent of Total Language Sub-Group	Speaking Less than Well Percent of Total Population
Total population			12,551		
Speak only English			9,311	74.19%	
Spanish or Spanish Creole	1,665	194	1,859	14.81%	1.55%
French (incl. Haitian, Cajun)	110	0	110	0.88%	0.00%
German	0	0	0	0.00%	0.00%
Russian, Polish, or other Slavic languages	74	0	74	0.59%	0.00%
Other Indo-European languages	331	19	350	2.79%	0.15%
Korean	19	0	19	0.15%	0.00%
Chinese	158	0	158	1.26%	0.00%
Vietnamese	16	17	33	0.26%	0.14%
Tagalog	159	0	159	1.27%	0.00%
Other Asian and Pacific Island languages	310	61	371	2.96%	0.49%
Arabic	11	34	45	0.36%	0.27%
Other and unspecified languages:	62	0	62	0.49%	0.00%
LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER Survey/Program: American Community Survey Universe: Population 5 years and over Year: 2023 Estimates: 5-Year Table ID: C16001					
Census Tract 4106.01; 4106.02; 3125.01; 3125.02; 4107.06					

For Table B16004, Age by Language Spoken at Home by Ability to Speak English, again no language was identified as meeting the threshold for Safe Harbor.

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER		
	Language Spoken at Home	Speak English "Less Than Well"
English	9,160	N/A
Spanish	1,827	62
Indo-European languages	534	0
Asian and Pacific Island languages	740	17
Other Language	107	0
Total Population	12,368	79
AGE BY 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: 2023 Estimates: 5-Year Table ID: B16004		
Census Tract 4106.01; 4106.02; 3125.01; 3125.02; 4107.06		

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

Midtown has not monitored the literacy rates of LEP populations in their native languages; however, Midtown provides both written and spoken translations in order to serve the LEP population effectively. Midtown 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. Midtown 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

Midtown does not provide transit services, 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 encounter the projects conducted by Midtown are during procurement or construction. Midtown 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 instances where there are disruptions, Midtown works with Houston METRO to address any concerns while keeping LEP persons in mind.

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

As stated in the Factor 2 analysis, Midtown 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. Midtown is able to translate all important documents and instructions in Spanish and any other language upon request.

Factor 4: Assessing the Resources Available to Transit and Costs

Midtown offers many opportunities for LEP persons to fully access information regarding the construction projects. Midtown Management District staff has the ability to proficiently translate oral conversations as well as written documentation from English to Spanish, or vice versa. Since no language met the threshold of safe harbor, Midtown does not anticipate many requested translations. 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 Midtown Management District's annual budget.

LANGUAGE ASSISTANCE PLAN (LAP) IMPLEMENTATION PLAN

Task 1 - Identifying LEP Individuals Who Need Language Assistance

Number or Proportion of LEP Persons served or Encountered in Eligible Service Population

According to the American Community Surveys included in the LEP Four Factor Analysis, no language was identified as meeting the Safe Harbor threshold of 1,000 individuals or 5% of the population. Midtown has already translated the public notice, complaint procedures, and compliant form into Spanish and will maintain the translation on their website.

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

Midtown does not provide transit services, 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 encounter the projects conducted by Midtown are during procurement or construction. Midtown 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 instances where there are disruptions, Midtown works with Houston METRO to address any concerns while keeping LEP persons in mind.

Task 2 - Language Assistance Measures

1. Every effort will be made to ensure at least one Spanish speaking employee at every public contact encounter, when requested in advance of meeting.
2. Midtown maintains a call list of employees that are available to provide language assistance, upon request.
3. Employment opportunities are advertised in multiple languages, including English, Spanish and any other requested language, as needed.
4. Published informational brochures and other important documentation regarding Midtown are written in English and Spanish and can be translated into any other language, upon request.
5. Midtown will have "I Speak" Card available at the Midtown offices and at any public contact encounter.
6. Utilization of language-free pictograms when possible.
7. American Sign Language interpreters are available for face-to-face meetings with Midtown staff upon advanced request.
8. Quarterly board meetings in evening hours at community location.

Task 3 – Providing Notice to LEP Persons

The Title VI Notice to the Public will be posted on Midtown offices, website, and at other strategic locations in Midtown facilities. The Title VI Notice to the Public has included a statement about translation availability at no cost

Task 4 – Monitoring and Evaluating Language Access Plan

Midtown will monitor the number of requests for translation for transit programs and services and note any comments and complaints about translations or language assistance. Midtown has created an internal log for all requests for translation assistance that logs the date, the requested language, and the actions taken to accommodate the request. The Language Access Plan will be updated every three years.

Task 5 - Training Staff

Training in LEP language assistance measures will be provided in conjunction with orientation for new employees to identify resources and procedures when communicating with LEPs. All new staff members will be informed of the Title VI plan and all language assistance measures that all employees of Midtown must perform.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Midtown will actively encourage committee membership by all interested parties regardless of race, color, or national origin. Currently, Midtown has an appointed Board of Directors with 17 active members, and there are three open positions on the Board.

Board members are required to be residents, property owners, or an agent of a property owner. When there is a vacancy, the Board publicly solicits invitations (through announcements at their board meetings). Midtown uses a Nominating Committee process to interview the applicants and to determine who would best have the qualifications to serve on the Midtown board. Once vetted, Midtown makes a recommendation to Houston City Council for these decisions. The City Council then votes on these positions to codify the action.

Below is the population demographic and Board of Directors breakdown.

<i>Body</i>	<i>White</i>	<i>Hispanic/ Latino</i>	<i>Black/ African- American</i>	<i>Asian</i>	<i>American Indian, Alaska Native, and Native Hawaiian and Other Pacific Islanders</i>	<i>Other</i>
Population	47.6%%	19.0%	17.2%	10.2%	1.1%	4.9%
Board of Directors	55%	18%	18%	9%	0	0

MONITORING SUBRECIPIENTS

Midtown does not have any subrecipients who receive federal financial assistance.

DETERMINATION OF SITE OR LOCATION OF FACILITIES

In the past three years, Midtown has not constructed any new transit facilities. Any construction of transit facilities receiving federal financial assistance within Midtown will perform a Title VI site equity analysis during the planning stage with regard to the location of the facility.

REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Midtown does not provide fixed route transit services and the requirements of Chapter IV do not apply to Midtown.

APPENDIX A – TITLE VI COMPLAINT FORM

The Midtown Management 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, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI 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 Capital Projects Manager for Midtown by calling 713-526-7577. The completed form must be returned to the Midtown Management District, 410 Pierce Street, Suite 355, Houston, Texas 77002.

Your Name:	Phone:
Street Address:	Alt Phone:
	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?
(Circle one)

- Race
- Color
- National Origin (Limited English Proficiency)

Date of Incident: _____

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

TITLE VI COMPLAINT FORM

The Midtown Management District

Please describe the alleged discrimination incident (continued)

Have you filed a complaint with any other federal, state, or local agencies? 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 DEL TÍTULO VI

El Distrito Administrativo de Midtown (Midtown) 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 u origen nacional, conforme a lo dispuesto por el Título VI del Acta de Derechos Civiles de 1964. Las quejas conforme al Título VI 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 Proyectos de Capital de Midtown llamando al 713-526-7577. El formulario completo deberá ser devuelto a la siguiente dirección: Midtown Management District, 410 Pierce Street, Suite 355, Houston, Texas 77002.

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):	
Nombre(s):	
Dirección residencial, Ciudad, Estado, y Código Postal:	

¿Cuál de los siguientes casos describe mejor la razón de la presunta discriminación? (Circule una opción)

Fecha del incidente: _____

- Raza
- Color
- Origen nacional (Conocimiento limitado del inglés)

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

FORMULARIO DE QUEJAS DEL TÍTULO VI

El Distrito Administrativo de Midtown

Por favor describa el presunto incidente discriminatorio (continuación)

¿Ha presentado usted una queja ante alguna otra agencia federal, estatal o local?
(Marque con un círculo) **Si / No**

Si la respuesta es “Si,” indique a continuación la agencia o agencias y la información de contacto:

Agencia:	Nombre de contacto:
Dirección, Ciudad, Estado, Código postal:	Teléfono:
Agencia:	Nombre de contacto:
Dirección, Ciudad, Estado, Código postal:	Teléfono:

Firma de quien presenta la queja	Fecha
----------------------------------	-------

Imprima el nombre de quien presenta la queja

Date Received:
Review By:

APPENDIX B – 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 Midtown o subcontratantes y contratistas. El programa también se lleva a cabo de acuerdo con la Circular 4702.1B de FTA. El formulario de queja de Midtown se encuentra en el Apéndice A.

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. Midtown tiene autoridad para aceptar quejas de investigación, pero los denunciantes 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 Texas Department of Transportation, ATTN: Civil Rights Division, 125 E. 11th Street, Austin, TX 78701. Si desea presentar una queja con FTA, envíe la queja por escrito al FTA Región VI, 819 Taylor Street, habitación 14A02, Fort Worth, TX 76102.

Las quejas o cumplidos pueden ser presentadas en persona al Coordinador del ADA en 410 Pierce Street, Suite 355, Houston, TX 77002, enviadas al 410 Pierce Street, Suite 355, Houston, TX 77002, enviadas por e-mail a través de <https://midtownhouston.com/contact>, o llamando al 713-526-7577, de 8:00 A.M. a 5:00 P.M., de lunes a viernes. 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.

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.

PROCEDIMIENTOS

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 de Midtown 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. La queja será tratada de la siguiente manera:

El denunciante debe cumplir con los siguientes requisitos. La Queja será:

1. Por escrito;
2. Fermado;
3. Fechado para el presunto acto de discriminación; y
4. Contener una descripción detallada de los problemas, incluyendo nombre(s) y trabajo(s).

Las acusaciones o alegaciones recibidas por fax o correo electrónico o 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 a Midtown 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.

Una vez que Midtown tenga toda la documentación asociada con la investigación, se le notificará por escrito al demandante la determinación dentro de diez (10) días calendario. La queja recibirá un número de caso y se registrará en los registros de Midtown identificando su base o razón (raza, color, u origen nacional) y presunto daño.

Dentro de los 40 días calendarios de la aceptación de la queja, el Coordinador del Título VI preparará un informe de investigación. El informe incluirá una descripción narrativa del incidente, identificación de las personas entrevistadas, hallazgos y recomendaciones para la disposición.

El Coordinador del Título VI enviará el informe al asesor legal para su revisión.

El asesor legal revisará el informe y la documentación asociada y proporcionará comentarios dentro de 10 días calendarios al Coordinador del Título VI, y se implementarán las modificaciones necesarias.

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