



TITLE VI PROGRAM

CIVIL RIGHTS ACT OF 1964

HOUSTON DOWNTOWN MANAGEMENT DISTRICT

March 2025

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Policy Statement

The Houston Downtown Management District (hereinafter referred to as "HDMD") 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, 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. HDMD is committed to ensuring equal and meaningful access to all federally funded programs, promoting full and fair participation in transportation-based decision making, and providing clear communication to all residents including persons with limited English proficiency.

HDMD developed this Title VI Program to address the requirements of the FTA Circular 4702.1B, Title VI Requirements and Guidelines for FTA Recipients. HDMD has developed 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. While HDMD does not provide transit, the management district does receive federal funding to design and construct public facilities and infrastructure. HDMD is committed to non-discrimination through the provided programs.

Authorities

The Title VI Plan is written in accordance with Title VI regulations consistent with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration and any future updates, 42 USC 2000d, Prohibition against exclusion from participation in, denial of benefits of, and discrimination under federally assisted programs on ground of race, color, or national origin, and 49 CFR part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation. HDMD will integrate Limited English Proficient (LEP) Persons (70 FR 74087) Recipients' Responsibilities into their programs and activities in Spanish and other languages, upon request.

A handwritten signature in black ink, appearing to read 'Kris Larson', with a stylized, looping flourish extending from the end of the name.

Kris Larson,
President & CEO

Title VI Public Notice

HDMD will post the following notice to the public on the HDMD's website and HDMD offices. 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 Houston Downtown Management District (HDMD) hereby gives public notice that it is the HDMD'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 HDMD. Any such complaint must be in writing or by phone and filed with HDMD within one hundred-eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained at no cost to the complainant by calling 713-650-3022. Individuals may get more information about the Title VI Program by calling 713-650-3022 or by emailing operations@downtownhouston.org.

If you like more information on Title VI, please visit the HDMD website (<https://downtownhouston.org/>) or contact the HDMD via phone 713-650-3022, via email to operations@downtownhouston.org, or via mail to: 1221 McKinney Street, Suite 4250, Houston, Texas 77010. This notice is to be posted on the HDMD website (<https://downtownhouston.org/>).

The HDMD 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 HDMD at 713-650-3022.

Título VI Aviso Público

Por medio de la presente, Houston Downtown Management District (HDMD) 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 de HDMD. 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 HDMD. Las quejas pueden hacerse por escrito o por teléfono. Estas deben ser presentadas ante el Coordinador del Título VI de HDMD 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 sin costo alguno para el reclamante llamando al 713-650-3022. Las personas pueden obtener más información sobre el Programa Título VI llamando al 713-650-3022 o enviando un correo electrónico a operations@downtownhouston.org.

Para obtener más información acerca del Título VI, visite nuestra página web (<https://downtownhouston.org/>), llámenos al teléfono 713-650-3022, escríbanos por correo electrónico (operations@downtownhouston.org), o envíenos un correo postal: 1221 McKinney Street, Suite 4250, Houston, Texas 77010. Este aviso será publicado en la página web (<https://downtownhouston.org/>).

HDMD 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 HDMD a 713-650-3022.

Title VI/Civil Rights Complaint Procedures

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 the HDMD or sub-recipients and contractors. The program is also conducted in accordance with FTA Circular 4702.1B.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. 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.

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 HDMD (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 does not provide remedies that include punitive damage or compensatory remuneration for complainant.

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 HDMD 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.

The complainant must meet the following requirements. The Complaint shall be:

- 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 email will be acknowledged, but the complainant is required to mail a signed, original copy of the email transmittal to the HDMD in order for the HDMD to be able to process it. All correspondence to the HDMD for processing should be addressed to the "Houston Downtown Management District" and should have "Attn: Title VI" on the outside. Allegations received by telephone will be transcribed and provided to the complainant for confirmation or revision before processing. A transcribed complaint form will be forwarded to the complainant for him/her to complete, sign and return to the HDMD for processing.

Complaints will be accepted based on the following:

1. If complaint has been filed in a 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.

Complaints 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.

Once the HDMD decides to proceed with the investigation, 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 HDMD's records identifying its basis of alleged harm: race, color, or national origin.

In cases where the HDMD engages in investigation of the complaint, the Title VI Coordinator will provide the individuals identified in the complaint with the opportunity to respond to the allegations in writing. The identified individuals will have ten (10) calendar days from the date of the HDMD'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 Title VI Coordinator will prepare an investigative report for the President/CEO. The report shall include a narrative description of the incident, identification of persons interviewed, and findings and recommendations. The President/CEO will have ten (10) calendar days to review and provide comments to the Title VI Coordinator.

After the Title VI Coordinator address any comments from President/CEO about the preliminary investigative report, the report and its findings will be forwarded to the HDMD'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 HDMD'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 HDMD will notify all parties of its findings.

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
Complaints				
1	None			
2				
3				
Investigations				
1	None			
2				
3				
Lawsuits				
1	None			
2				
3				

Promoting Inclusive Public Participation

It is the goal of HDMD to establish a public participation process that is inclusive, transparent, efficient, and purposeful for citizens/constituents to become engaged in planning and capital project activities. No minority or socioeconomic groups will be excluded in the planning process.

HDMD has developed the 2021-2025 Service & Improvement Plan and Assessment Plan that details the services provided by the district, and improvements made in support of the District's goals. This documentation provides an outline of projects that are a focus of HDMD and where funding should be spent. The document was adopted after HDMD received valid signed petitions in support from at least 50% of owners of taxable value and/or 50 persons owning property within the District, held a public meeting for stakeholder input, and then was approved by the Board of Directors. The document is available online for the public.

HDMD provides public notice of all meetings through multiple means, including social media, newsletters, and other means. HDMD uploads an agenda on their website as well as provides notice of the meetings and project changes on their social media. HDMD will ensure that bilingual staff will be at meetings to translate when requested in advance. HDMD provides multiple methods for individuals to provide comments and feedback. HDMD is active on their Facebook account and provides information regarding meetings as well as construction closures on that platform as well as on their Investment Map. HDMD can utilize the Spanish translations on the platform to provide information to its LEP populations.

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 HDMD during the planning, design, public outreach, procurement, and construction of federally approved transit and pedestrian capital projects, including transit stops, sidewalks, and other mobility 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 for US Census Tracts in Harris County. HDMD decided to continue to use this table along with other tables that have more up to date information. For this data, HDMD's population is considered all US Census Tracts that have a portion within HDMD boundaries.

According to Table B16001 (2015), the percentage of Spanish-speaking individuals who report speaking English "less than well" is 7.02% of the total management HDMD population or 1,382 individuals, which meets the Safe Harbor threshold of 1,000 individuals or 5% of the population.

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER							
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
Total population					19,697		
Speak only English					14,475	73.49%	
Spanish or Spanish Creole	2,624	65.50%	1,382	34.50%	4,006	20.34%	7.02%
French (incl. Patois, Cajun)	85	81.73%	19	18.27%	104	0.53%	0.10%
French Creole	6	100.00%	0	0.00%	6	0.03%	0.00%
Italian	97	86.61%	15	13.39%	112	0.57%	0.08%
Portuguese or Portuguese Creole	11	100.00%	0	0.00%	11	0.06%	0.00%
German	60	100.00%	0	0.00%	60	0.30%	0.00%
Yiddish	0	0.00%	0	0.00%	0	0.00%	0.00%
Other West Germanic languages	22	100.00%	0	0.00%	22	0.11%	0.00%
Scandinavian languages	16	66.67%	8	33.33%	24	0.12%	0.04%
Greek	0	0.00%	0	0.00%	0	0.00%	0.00%
Russian	17	100.00%	0	0.00%	17	0.09%	0.00%
Polish	0	0.00%	0	0.00%	0	0.00%	0.00%
Serbo-Croatian	56	100.00%	0	0.00%	56	0.28%	0.00%
Other Slavic languages	11	100.00%	0	0.00%	11	0.06%	0.00%
Armenian	0	0.00%	0	0.00%	194	0.98%	0.00%
Persian	0	0.00%	0	0.00%	15	0.08%	0.00%
Gujarati	22	37.93%	36	62.07%	58	0.29%	0.18%
Hindi	42	100.00%	0	0.00%	42	0.21%	0.00%
Urdu	18	100.00%	0	0.00%	18	0.09%	0.00%
Other Indic languages	0	0.00%	0	0.00%	0	0.00%	0.00%
Other Indo-European languages	16	100.00%	0	0.00%	16	0.08%	0.00%

Chinese	194	92.82%	15	7.18%	209	1.06%	0.08%
Japanese	24	100.00%	0	0.00%	24	0.12%	0.00%
Korean	0	0.00%	0	0.00%	0	0.00%	0.00%
Mon-Khmer, Cambodian	0	0.00%	41	100.00%	41	0.21%	0.21%
Hmong	0	0.00%	0	0.00%	0	0.00%	0.00%
Thai	20	100.00%	0	0.00%	20	0.10%	0.00%
Laotian	0	0.00%	0	0.00%	0	0.00%	0.00%
Vietnamese	39	30.95%	87	69.05%	126	0.64%	0.44%
Other Asian languages	57	100.00%	0	0.00%	57	0.29%	0.00%
Tagalog	25	100.00%	0	0.00%	25	0.13%	0.00%
Other Pacific Island languages	89	100.00%	0	0.00%	89	0.45%	0.00%
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	0	0.00%	0	0.00%	0	0.00%	0.00%
Arabic	0	0.00%	15	100.00%	15	0.08%	0.08%
Hebrew	0	0.00%	0	0.00%	0	0.00%	0.00%
African languages	28	75.68%	9	24.32%	37	0.19%	0.05%
Other and unspecified languages	16	100.00%	0	0.00%	16	0.08%	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: 1000, 2101, 4101, 4106, 5101							

Since both Safe Harbor thresholds were barely met looking at 2015 data, HDMD investigated other data tables with data from FY 2023. Table C16001, Language Spoken at Home, provides similar information with fewer languages identified. The breakdown is similar to the above table, with Spanish barely meeting both Safe Harbor thresholds. The percentage of Spanish-speaking individuals who report speaking English “less than well” is 5.06% of the total management HDMD population or 1,293 individuals, which again meets the Safe Harbor threshold. No other 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				25,566	
Speak only English				18,812	73.58%
Spanish or Spanish Creole	3,624	1,293	4,917	19.23%	5.06%
French (incl. Haitian, Cajun)	275	8	283	1.11%	0.03%
German	130	0	130	0.51%	0.00%
Russian, Polish, or other Slavic languages	55	11	66	0.26%	0.04%
Other Indo-European languages	700	29	729	2.85%	0.11%
Korean	8	0	8	0.03%	0.00%
Chinese	183	14	197	0.77%	0.05%
Vietnamese	74	19	93	0.36%	0.07%
Tagalog	8	37	45	0.18%	0.14%
Other Asian and Pacific Island languages	168	0	168	0.66%	0.00%
Arabic	0	64	64	0.25%	0.25%
Other and unspecified languages:	54	0	54	0.21%	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					
US Census Tracts: 1000.01, 4102.02, 4106.02, 5101, 9802, 9807					

For Table B16004, Age by Language Spoken at Home by Ability to Speak English, Spanish is again identified as meeting the threshold for Safe Harbor. All other language groups do not meet the threshold.

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	18,812	N/A
Spanish	4,917	1,293
Indo-European languages	1,208	48
Asian and Pacific Island languages	511	70
Other Language	118	64
Total Population	25,566	1,475
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: 20231 Estimates: 5-Year Table ID: B16004		
US Census Tracts: 1000.01, 4102.02, 4106.02, 5101, 9802, 9807		

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

HDMD has not monitored the literacy rates of LEP populations in their native languages; however, HDMD will provide both written and spoken translations in order to serve the LEP population effectively. HDMD will continue to provide written translations in Spanish for “vital” documents but will document when requested to translate information orally. Requests for oral translations in any other 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. HDMD 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

HDMD does not provide transit services but rather utilizes FTA funds to develop pedestrian infrastructure that enhances people’s ability to easily access the transit services provided by Houston METRO. The most likely instances that LEP persons would encounter the projects conducted by HDMD is during the procurement or construction of pedestrian infrastructure. HDMD 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, HDMD works with Houston METRO to address any concerns while keeping LEP persons in mind and provide notifications and proper signage to address the detours. No translations have been requested in the past. All vital documents, such as forms and public notices, will be translated into Spanish.

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

As stated in the Factor 2 analysis, HDMD 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. HDMD will translate all important “vital”

documents and instructions in Spanish and can translate any other language upon request. Vital documentation may mean detour instructions, public notices for construction projects, instruction on filing Title VI complaints, and other documentation. HDMD has no direct control or decision making of the transit services.

Factor 4: Assessing the Resources Available to Transit and Costs

HDMD offers many opportunities for LEP persons to fully access information regarding the construction projects. HDMD 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 meetings, planning, and contracting opportunities as well as any construction delay or detour notices, will be translated into Spanish. HDMD recognizes that non-Spanish speaking LEP persons also live within the service area. HDMD does not anticipate many other translation requests, but will accommodate any request, if needed. Costs for any requested translations (either due to staff time or other translation services) and printing of translated documents might cost up to \$1,000 a year. All costs are absorbed into the HDMD'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 Surveys included in the LEP Four Factor Analysis, only Spanish was identified as meeting the Safe Harbor threshold of 1,000 individuals or 5% of the population. Across all three tables, Spanish LEP speakers represented around 5% of the reviewed with minimal LEP percentage in other languages.

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

HDMD does not provide transit services but rather utilizes FTA funds to develop pedestrian infrastructure that enhances people's ability to easily access the transit services provided by Houston METRO. The most likely instances that LEP persons would encounter the projects conducted by HDMD is during the procurement or construction of pedestrian infrastructure. HDMD 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, HDMD works with Houston METRO to address any concerns while keeping LEP persons in mind and provide notifications and proper signage to address the detours. No translations have been requested in the past. All vital documents, such as forms and public notices, will be translated into Spanish.

Task 2 - Language Assistance Measures

HDMD will provide language assistance options, including notices to LEP persons in a language they can understand regarding their right to free language assistance. HDMD will provide translation services for public documents and competent interpreters at public hearings when requested.

HDMD will make their 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.

Specific Activities for Limited English Proficiency Individuals

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

- A. There will be at least one Spanish-speaking employee at a public contact event or board meeting, when a request is made in advance of the event or meeting.

- B. HDMD will ensure that if at any time an employee or an appointed substitute is not available to provide language assistance, HDMD will contract with outside agency to assist with translation for languages other than Spanish upon advance request.
- C. Public notices on federally funded programs will be advertised in different languages, including English and Spanish.
- D. HDMD will publish informational brochures, flyers, etc., regarding the HDMD FTA-funded programs are written in English and Spanish and may be translated to other languages upon request.
- E. American Sign Language interpreters will be available for face-to-face meetings with HDMD staff regarding FTA-Funded Programs upon advance request.

Task 3 – Providing Notice to LEP Persons

The Title VI Notice to the Public will be posted on the HDMD 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

HDMD will monitor the program to ensure that LEP persons have meaningful access to the transportation planning and implementation process. HDMD 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 along with the triennial Title VI update.

Task 5 – Training Staff

HDMD has provided training for staff to ensure they are knowledgeable and has been provided with this Title VI plan. In the future, all new staff members will be informed of the Title VI Program, and all language assistance measure HDMD employees are required to perform.

Minority Representation on Planning and Advisory Boards

HDMD has a Board of Directors comprised of area stakeholders and/or business owners. It is important for HDMD to have a diverse board that represents all areas of the HDMD and represents a diverse cultural and racial population. The Board breakdown is provided below and there are two (2) open positions currently. All appointments to the Board will consider the representation of the management district and encourage minority representation.

	White	Hispanic	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Other
US Census Population	45%	22%	23%	<1%	6%	<1%	3%
Board of Directors	49%	18%	22%	0%	11%	0%	0%

Monitoring of Sub Recipients

The HDMD 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 HDMD in the past three years. Any construction of transit facilities receiving federal financial assistance within the HDMD will perform a Title VI site equity analysis during the planning stage regarding the location of the facility.

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

The HDMD does not provide fixed-route transit services.

Attachment A – Title VI Complaint Form

Houston Downtown Management District (HDMD) 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.

SECTION 1: TYPE OF COMMENT (Choose One)							
☐ RACE	☐ COLOR	☐ NATIONAL ORIGIN/ LIMITED ENGLISH PROFICIENCY					
SECTION 2: CONTACT INFORMATION							
Salutation (Mr/Mrs./Ms).							
Name							
Street Address							
City, State, ZIP Code							
Telephone							
E-mail Address							
Accessible Format	LARGE PRINT		TDD/RELAY		AUDIO		OTHER
SECTION 3: COMMENT DETAILS							
Project							
Date & Time of Occurrence							
Name of Individuals Involved or Description of Individuals							
Location of Incident							
Description of Incident							
SECTION 4: FOLLOW UP							
May we contact you if we need more details or information?					Yes		No
What is the best way to reach you?			Phone		E-mail		Mail

*Houston Downtown, 1221 McKinney Street, Suite 4250, Houston, Texas 77010, 713-650-3022,
operations@downtownhouston.org*

Formulario de Quejas de Título VI

Houston Downtown Management District (HDMD) 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.

SECCIÓN I: TIPO DE COMENTARIO (Elija solo una opción)									
☐ Raza	☐ Color	☐ Origen nacional / Conocimiento limitado del inglés							
SECCIÓN II: INFORMACIÓN DE CONTACTO									
Título (Señor/Señora)									
Nombre									
Dirección									
Ciudad, Estado, Código Postal									
Teléfono									
Dirección de Correo/E-mail									
Requisito de Accesibilidad	Letra grande		Servicio de Relevos de TDD		Grabación de Audio		Otro		
SECCIÓN III: DETALLES ACERCA DEL COMENTARIO									
Proyecto									
Fecha y hora de ocurrencia									
Nombre de individuos involucrados o información descriptiva de individuos									
Lugar del Incidente									
Descripción del Incidente									
SECCIÓN IV: SEGUIMIENTO									
¿Podemos contactarlo si necesitamos más detalles o información?					Si		No		
¿Cuál es la mejor manera de contactarlo?			Por Teléfono		Por E-mail		Por Correo Postal		

Houston Downtown, 1221 McKinney Street, Suite 4250, Houston, Texas 77010, 713-650-3022,
operations@downtownhouston.org

Attachment B – Board of Directors Approval of Title VI Program

RESOLUTION ADOPTING A TITLE VI COMPLIANCE PLAN FOR HOUSTON DOWNTOWN MANAGEMENT DISTRICT

WHEREAS, on April 10, 2025, the Houston Downtown Management District (hereinafter referred to as "HDMD") adopted a Title VI Compliance Plan in accordance with 49 CFR Part 21;

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

WHEREAS, HDMD 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 HDMD THAT:

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

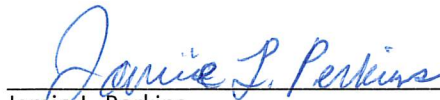
Section 2. The Title VI Compliance Plan shall be administered and enforced by the officers, agents and employees of HDMD in accordance with the terms set forth therein.

Section 3. This resolution shall be effective immediately upon

adoption. PASSED AND APPROVED this the 10th day of April 2025.


Leslie G. Ashby, Board Chair
Houston Downtown Management District

ATTEST:


Jamie L. Perkins
Assistant 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 HDMD o subcontratantes y contratistas. El programa también se lleva a cabo de acuerdo con la Circular 4702.1B de FTA.

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.

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. HDMD 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 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.

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 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 de la transmisión por correo electrónico a HDMD para que HDMD pueda

procesarlo. Toda la correspondencia con HDMD debe dirigirse al presidente y debe tener "Attn: Title VI" 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 HDMD 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.

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 HDMD decida proceder con la investigación, se le notificará por escrito al demandante la determinación dentro de diez (10) días calendarios. Se le asignará un número de caso a la queja y se registrará en los registros de HDMD identificando su razón de ser (raza, color, u origen nacional).

En los casos en que HDMD asuma la investigación de la denuncia el Coordinador del Título VI 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 HDMD 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 Título VI preparará un informe de investigación para el presidente/la presidenta. El informe incluirá una descripción narrativa del incidente, identificación de las personas entrevistadas, hallazgos y recomendaciones para la disposición. El presidente/la presidenta tendrá diez (10) días calendarios para evaluar y proporcionar comentarios.

Después de que el Coordinador del Título VI aborde cualquier comentario del presidente/ la presidenta sobre el informe de investigación preliminar, el informe y sus conclusiones serán remitidas al personal legal de HDMD 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 de HDMD y una copia de la queja serán enviadas a FTA dentro de los 60 días calendarios posteriores a la aceptación de la queja. HDMD notificara a las partes sobre sus conclusiones preliminares.

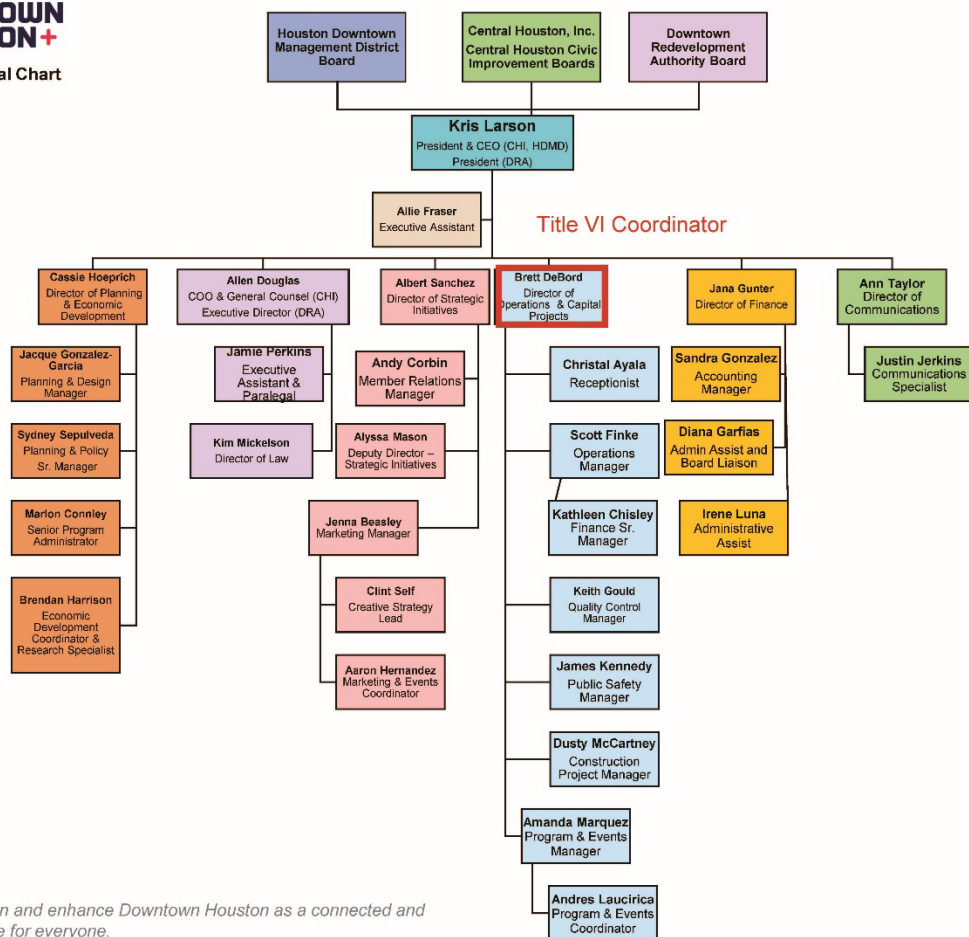
Attachment D – Organization and Staffing

The District has assigned Brett DeBord, Director of Operations & Capital Projects, to perform the duties of the Title VI Coordinator and ensure implementation of the District’s Title VI program.

The Title VI Coordinator is responsible for:

- Maintaining and updating the Title VI plan on the District’s behalf;
- Ensuring relevant District staff receive necessary Title VI training;
- Ensuring prompt processing of Title VI complaints;
- Conducting Title VI reviews of program areas; and
- Developing Title VI information for dissemination internally and externally.

**DOWNTOWN
HOUSTON+**
Organizational Chart
June 2026



We champion and enhance Downtown Houston as a connected and thriving place for everyone.