

# **City of Houston Community Participation Plan**

# COMMUNITY PARTICIPATION PROCESS

City of Houston has implemented a Public Participation Plan in compliance with all federal laws and regulations throughout the public participation process, including adherence to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990.

As sub-recipients of federal financial assistance, the City of Houston provides an opportunity for public involvement and full access to the decision-making process in each stage of the planning and development of a project. The Capital Improvement Plan (CIP) addresses the infrastructure needs for the City of Houston. In addition to the CIP, Rebuild Houston, a ten-year plan, is the City of Houston's initiative to improve the quality of life and mobility for residents of the city by rebuilding our drainage and street infrastructure.

The federal requirement for notification to beneficiaries and participants includes written documents (i.e., plans, reports, pamphlets, brochures, etc.), information posted on websites, and posters provided on-site. Each project must have a detailed dissemination of Title VI Program obligations and notification to the public of the protections against discrimination afforded to them by Title VI Program requirements:

- [1] **Dissemination of Information**. In coordination with City departments, develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English. The City shall disseminate this information to the public via accessible printed and electronic media, including posting on the Applicant's website;
- [2] Contents of Notification. At a minimum, the notification should include the following:
  [a] Statement that the City does not discriminate with regard to race, color, national origin, sex, age, disability, income-level, or Limited English Proficiency (LEP);
  - [b] Procedures to be followed by the public to request additional information regarding the City's Nondiscrimination obligations; and
- [3] **Identify Procedures**. The procedures that are to be followed by the public to file a discrimination complaint with the City of Houston, including providing the public with the name of a City contact representative, address, and telephone number/e-mail address.

The City of Houston conducts public meetings on the City's Annual Capital Budget in each council district. These meetings provide the public the opportunity to participate in the capital budget process by contributing comments and suggestions about needed services and improvements. The City of Houston's inclusive public participation plan adhere to the following:

- All meetings of the Council and of all committees are open to the public and the rules of the Council provide that the public shall have a reasonable opportunity to be heard at any such meetings in regard to any matter to be considered. These meetings take place every Tuesday of every week, unless it is a public holiday. The meetings take place at City Hall, 901 Bagby Street, Council Member Chambers (2nd Floor), Houston, Texas.
- The City of Houston, its prime contractors, and other delegates conduct stakeholder meetings to provide information and collect feedback from interested parties. The meeting locations are

coordinated with stakeholders to ensure maximum participation.

- The City of Houston, its prime contractors and other delegates' public meetings are to provide information and collect feedback from individuals that have public comments. The meetings take place in public venues in the respective communities and neighborhoods for which the project is undertaken. The meetings are scheduled on weekday evenings after 6:00 pm.
- The City of Houston also publishes web based and mail notices to notify the public and to collect public comments.

### LANGUAGE ACCESS SERVICES

#### Language Access Services

The City of Houston's Language Access requirements are governed by its *Administrative Procedure* 2-11. This citywide procedure establishes policies for providing information about City services, programs, and activities to residents and visitors with Limited English Proficiency (LEP) and applies to all City of Houston departments. The policy states in part, that:

- When feasible, the City shall provide essential public information for a minimum of the top 5 commonly-used languages utilized by the City's culturally diverse population.
- Language assistance will be provided through the use of competent bilingual staff interpreters, or interpretation or translation services.
- All interpreters, translators, and other resources needed to comply with this policy shall be provided without cost to the LEP individual being served and constituents and visitors will be informed that the services are free of charge.
- All departments that provide services directly to the public shall provide information about LEP services by developing and implementing department or agency-specific language access plans. Departments are responsible for conducting regular reviews of its language access resources and plans, and update them as necessary.
- City employees who routinely have direct interaction with the public shall be trained in language access policies and procedures that shall include protocols for assisting LEP populations. City employees shall also be trained on efficient communication techniques, the effective use of an interpreter, and on how to properly interact with LEP individuals.

The policy also provides an LEP individual assistance procedure that City employees are to apply when assisting LEP individuals, whether in person or via phone and may be adjusted given the actual circumstances.

- <u>Identification</u> City employees should identify the language of communication needs of the LEP individual.
- <u>Interpreters</u> City departmental employees should first use their in-house staff fluent in the respective language, if available, to interpret. Departments shall maintain a list of bilingual or multilingual employees. The list should contain the employee's name, the language they speak and their phone number.
- <u>Family/Friends</u> LEP individuals who prefer to use a family member, or friend as an interpreter, may do so if they request it.
- <u>Language Line</u> When a department bilingual employee is not available, staff may use the Language Line through the City's 3-1-1 Service Line Division. A.P. 2-11 provides guidance to City employees on the process to use when telephone interpretation via the Language Line is required.

<u>TITLE VI WEB PAGE</u>: The Title VI webpage is designed to ensure Title VI information is readily accessible to the public. The website informs the public of their rights under Title VI and provides information on how to file a complaint. The information available on the Title VI website, <u>https://www.houstontx.gov/obo/title-vi</u>, includes:

- The City of Houston Title VI Plan
- Title VI and Related Statutes Nondiscrimination Statement (Versions include English, Spanish, Traditional Chinese, Vietnamese, Korean, Hindi, Urdu)
- Title VI Nondiscrimination Assurances
- City of Houston Title VI Annual Work Plan
- The most recent version of the Annual Accomplishment Report
- City of Houston External Discrimination Complaint Form (English and Spanish)
- Title VI Poster (English & Spanish)
- Title VI Requirements for Subrecipients
- [DOT]'s Title VI Technical Assistance Guide for Subrecipients
- City of Houston Language Assistance Plan
- iSpeak Cards

<u>NOTIFICATION TO BENEFICIARIES</u>: The City of Houston provides versions of posters, brochures, and survey cards at every public hearing and meeting. These program posters and brochures are available in languages other than English, as needed. Current copies of the City of Houston Title VI Notice to the Public are available and accessible at City buildings.

<u>CitizensNet</u>: Provides periodic emails from the Mayor and the City of Houston on topics of interest to citizens and their neighborhood. Archived notices are held on the City website after initial submission as well.

Capital Improvement Plan (CIP) meetings are held in every district. The meeting notices are sent out via CitizensNet to the emailing list for the CIP process via CitizensNet.

Rebuild Houston notifications are sent out to citizens via CitizensNet for the Rebuild Houston project.

### DATA COLLECTION, ANALYSIS, AND REPORTING

The City of Houston recognizes the importance of identifying and addressing any trends or patterns of discrimination in its programs, services, and activities. Collecting, analyzing, and maintaining statistical data on race, color, national origin, sex, age, etc., are effective mechanisms to verify the distribution and impact of federal program funding to beneficiaries and impacted communities.

In accordance with federal requirements and its Title VI Program, the City of Houston will, on an annual basis, collect Title VI Non-discrimination related data and analyze such data to ensure that all of its programs, services, facilities, and projects are effectively meeting the needs of all persons without discrimination.

#### **Data Collection**

Potential sources of data collection for the City of Houston's Title VI Program include, but are not limited to:

- US Census Data
- Forms or Surveys
- Data from School Districts
- Utilization of the 4 Factor Analysis for Limited English Proficient Individuals

#### Reporting

The Title VI Coordinator will work with City Department Title VI Liaisons to identify data needs on an annual basis. Data analysis summary results will be included as a part of the City's Title VI Accomplishment Report.

#### Analysis

Title VI collected data is to be analyzed for the purpose of identifying any patterns of discrimination or the potential for discrimination. Corrective action, as appropriate, will be taken by the City of Houston.

In determining compliance with the City's Title VI Program, consideration for the following will be given:

- The eligible population to be served by race, color and national origin.
- The way in which services are or will be provided, any related data necessary to determine whether any persons are or will be denied such services on the basis of their protected class identified by the Title VI Act of 1964.
- Where determination of location is involved, the requirements and steps used or proposed to guard against unnecessary impact on persons on the basis of race, color, and national origin.
- The location of existing or proposed facilities connected with the program, and related information adequate for determining whether the location has, or will have the effect of unnecessarily denying access to any persons on the basis of prohibited discrimination.

The types of analysis to address compliance with the City's Title VI program include, but are not limited to:

- Language assistance needs assessment.
- Strategies for information dissemination.
- Percent of benefits allocated to persons below the poverty line versus persons above the poverty line.
- Distribution of benefits such as dollars, facilities, projects, etc., by groups and communities.
- Allocation of funds by mode such as highway, bus, etc.
- Projected population increases versus planned facilities and type of facilities.

- Impact of investments on income, race, color, national origin, sex, age and disability groups.
- Transportation needs of all persons within boundaries of plans or projects.
- Persons included in the decision-making process.

## UPDATING THE CITY'S TITLE VI COMMUNITY PARTICIPATION PLAN

The Title VI Coordinator will review the City of Houston's Community Participation Plan on an annual basis to determine what, if any changes are needed to ensure compliance with the Title VI Program.