



**CITY OF
ALED0**

**TITLE VI
NONDISCRIMINATION PLAN
2026**

TITLE VI COORDINATOR

Travis Askins, Director of Public Works
City of Aledo
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1. Purpose and Policy

The City of Aledo is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City program, service, or activity receiving Federal financial assistance on the basis of race, color, or national origin, consistent with Title VI of the Civil Rights Act of 1964.

The City also administers its programs and activities in accordance with other applicable federal and state nondiscrimination requirements. References in this plan to “Title VI/Nondiscrimination” are intended to support coordinated administration; complaint routing may differ depending on the legal authority involved.

The City will take reasonable steps to provide meaningful access to Limited English Proficient (LEP) persons and will provide reasonable accommodations for persons with disabilities as required by applicable law.

Policy Statement

It is the policy of the City of Aledo to provide its programs, services, and activities in a fair and nondiscriminatory manner. Retaliation against any person for filing a discrimination complaint or participating in a related proceeding is prohibited.

2. Standard DOT Title VI Assurances

The City will maintain current, executed U.S. Department of Transportation Standard Title VI/Nondiscrimination Assurances applicable to its federal-aid activities. The executed assurances and required appendices should be attached to this plan and renewed or updated when required by TxDOT or when an authorized signatory changes.

3. Federal Financial Assistance

The City will identify and monitor programs and activities receiving federal financial assistance, including assistance passed through TxDOT. The Title VI Coordinator will coordinate with applicable City departments to ensure that Title VI requirements are incorporated into the administration of those programs and activities.

4. Title VI Notice to the Public

The City will make a Title VI/Nondiscrimination Notice available to the public through appropriate means, including the City website and public-facing City facilities. The notice will explain the public's right to be free from discrimination and identify how to obtain information or file a complaint.

The City will make translated or alternative-format versions available when appropriate to provide meaningful access.

5. Organization and Responsibilities

Title VI/Nondiscrimination Coordinator

The City Manager designates the Director of Public Works, Travis Askins, as the City of Aledo Title VI/Nondiscrimination Coordinator.

The Coordinator is responsible for:

- Maintaining and updating the City's Title VI/Nondiscrimination Plan;
- Ensuring relevant City staff receive appropriate Title VI training;
- Ensuring prompt processing of Title VI complaints and referral to TxDOT or the appropriate authority;
- Maintaining the Title VI complaint log and related records;
- Coordinating collection and review of demographic and program data when needed to assess nondiscrimination;
- Coordinating LEP language-assistance procedures and monitoring language-assistance requests;
- Reviewing public participation practices for meaningful access;
- Coordinating Title VI requirements in applicable contracts, solicitations, and agreements;
- Preparing or coordinating the annual Title VI work plan/accomplishment review; and
- Serving as the City's primary point of contact for TxDOT Title VI matters.

City Manager

The City Manager provides administrative oversight, supports implementation across City departments, and signs or approves Title VI documents when authorized.

Departments and Offices

Department directors and staff are responsible for implementing the applicable portions of this plan within their programs and for promptly notifying the Title VI Coordinator of complaints, language-assistance needs, public-participation concerns, or other Title VI issues.

6. Program Area Review Procedures

The City will review program areas that may involve federal financial assistance or activities affecting public access to City services. Reviews should be proportionate to the program and documented when a Title VI concern is identified.

Program Area	Title VI/Nondiscrimination Considerations	Review Procedure
Permitting and regulatory activities	Consistent application of requirements; meaningful access to information.	Review forms, notices, procedures, and complaints; evaluate demographic impacts when warranted.
Public Works / streets / utilities	Equitable access to services; impacts of projects; public outreach.	Review project outreach, service requests, complaints, and affected-population information as appropriate.
Contracting and procurement	Open and nondiscriminatory contracting; required federal clauses.	Review solicitations/contracts for applicable clauses and flow-down requirements.
Public meetings and engagement	Meaningful opportunity to participate, including LEP access.	Review notices, meeting access, accommodation/language requests, and outreach methods.
Right-of-way / property activities, when applicable	Fair treatment and notice to affected property owners.	Review notices, records, demographic information when relevant, and complaint history.

Internal Program Reviews

At least annually, the Title VI Coordinator will select one or more relevant program areas, projects, or processes for a documented Title VI review using a risk-based approach. Selection factors may include federal funding, the nature and location of services or projects, affected populations, complaints, public comments, prior findings, language-assistance needs, and changes in procedures or staffing.

Each review will, as applicable:

- Define the scope, responsible staff, records requested, and review schedule;
- Examine policies, notices, public outreach, demographic and service data, complaints, contracts, language-access measures, and prior corrective actions;
- Determine whether the program is being administered without discrimination based on race, color, or national origin;
- Document findings, observations, required corrective actions, responsible parties, and target completion dates; and
- Verify and document closure of any corrective action.

Corrective Action and Enforcement

When a review identifies a deficiency, the Title VI Coordinator will seek prompt voluntary compliance and issue a written corrective-action requirement proportionate to the deficiency. The responsible department, contractor, or other covered entity must identify remedial steps and a completion schedule. The Coordinator will monitor progress, provide technical assistance as appropriate, and document resolution. Unresolved or serious noncompliance will be elevated to the City Manager and referred to TxDOT or the appropriate federal agency when required. Available contract or funding remedies may be used consistent with applicable law and agreement terms.

Subrecipient Oversight

The City does not currently pass Federal-aid highway funds through to another subrecipient. If the City later awards or passes through such assistance, it will require applicable Title VI assurances and contractual obligations; provide notice and technical assistance; conduct risk-based compliance reviews; collect sufficient implementation information; require and monitor corrective action; maintain oversight records; and report noncompliance to TxDOT as required.

7. Contracting and Procurement

For federally assisted contracts and agreements, the City will include applicable nondiscrimination clauses and other required federal contract provisions. The Title VI Coordinator will coordinate with the staff responsible for procurement and project administration to confirm that required provisions are included and flowed down to applicable subcontractors.

For Federal-aid highway construction contracts, the City will follow current TxDOT/FHWA requirements in effect at the time of solicitation and contract execution. Because FHWA revised its Form FHWA-1273 requirements in 2026, the City will verify the current required contract provisions for each applicable project rather than relying on an outdated attachment.

8. Plan Administration

The Title VI Coordinator will maintain this plan, coordinate implementation, and make it available to employees and the public as appropriate. Relevant employees will be informed of their responsibilities under the plan.

The City will maintain documentation sufficient to demonstrate implementation, including complaint records, training records, language-assistance requests, public-participation documentation, and program-review records when applicable.

Dissemination of Title VI Information

The City will make its Title VI policy statement, bilingual public notice, complaint procedures, complaint form, and information about free language assistance available through the City website and appropriate public-facing locations. The LEP Interpreter Services Poster will be provided to department heads for posting where it is readily visible to the public. The City will provide accessible or additional translated formats when needed for meaningful access and will include appropriate nondiscrimination and language-assistance notices in significant public communications for federally assisted activities.

Review of Directives

At least annually and when material changes occur, the Title VI Coordinator will review relevant City policies, procedures, manuals, forms, public notices, agreements, and new TxDOT/FHWA directives that affect federally assisted programs. The Coordinator will recommend revisions needed to maintain compliance and will document material updates through the annual work plan and accomplishment review.

Compliance Administration

The City will cooperate with TxDOT and federal compliance reviews, provide requested records, implement required corrective actions, and preserve documentation showing completion. Nothing in this plan limits TxDOT or a federal agency from exercising its compliance and enforcement authority.

9. Limited English Proficiency (LEP) Plan

Purpose

The City of Aledo will take reasonable steps to ensure meaningful access to City programs, services, and activities by persons with limited English proficiency. The City will use the four-factor analysis described below to determine the appropriate level of language assistance.

Four-Factor Analysis

Factor 1 - Number or proportion of LEP persons eligible to be served or likely to be encountered.

The City reviewed the most recent available U.S. Census Bureau data. U.S. Census Bureau QuickFacts reports that 5.3% of Aledo residents age five years and older speak a language other than English at home, based on 2020-2024 estimates. Because Aledo is a relatively small community, detailed language-specific estimates may carry substantial margins of error. The City will supplement Census information with actual language-assistance encounters, requests, and project-specific demographic information.

LEP Demographic and Language-Access Narrative

Current available data indicate that 5.3% of Aledo residents age five and older speak a language other than English at home. This measure is a screening indicator and is not the same as the number of persons who speak English less than very well. Because Aledo has a small population and detailed language estimates may have large margins of error, the City will not rely on the citywide percentage alone. The City will combine Census information with the LEP Request Log, actual encounters, public comments, project-specific demographic data, and consultation with affected communities. Spanish-capable City employees are identified as a language-assistance resource, but employee language skills are not treated as demographic evidence or as a substitute for qualified interpretation when accuracy is important.

Indicator / Source	Current Aledo Information	How the City Will Use It
U.S. Census Bureau QuickFacts, 2020-2024 estimates	5.3% of residents age 5+ speak a language other than English at home	Citywide screening; not a direct count of LEP residents

Indicator / Source	Current Aledo Information	How the City Will Use It
City bilingual-resource review, September 2026	Utility Services: 1 Spanish-speaking employee; Police: 1 Spanish-speaking employee	Potential routine assistance resource; verify availability and use qualified services when needed
LEP Language Assistance Request Log	Record language, program, assistance, documents, and cost/notes for each significant request	Review at least annually to measure frequency and identify recurring needs
Project-specific review	Use current ACS/Census data, maps, outreach, comments, and local knowledge for the affected area	Determine targeted outreach, interpretation, and translation for each applicable project or activity

Factor 2 - Frequency of contact with LEP persons.

The City will monitor requests for interpretation or translation and document significant LEP interactions. Frequency of contact will be considered when determining whether additional translated materials or interpreter resources are warranted.

Factor 3 - Nature and importance of the program, activity, or service.

Greater language assistance will be considered for programs or communications involving important rights, public safety, access to essential City services, deadlines, hearings, or other matters where lack of understanding could have significant consequences.

Factor 4 - Resources available and costs.

The City will consider available bilingual staff, qualified interpretation or translation services, translated materials, technology that can assist with routine communication, and the cost and availability of language services. Cost alone will not be used to deny meaningful access when language assistance is necessary.

Notification and Posting

The City will post the bilingual LEP Interpreter Services Poster included as Attachment 8 at City Hall and other public-facing locations where federally assisted services are provided or where language-assistance needs are reasonably likely. The bilingual Title VI Notice in Attachment 7 will be posted on the City website and at appropriate public-facing facilities. Notices will state that language assistance is available free of charge. Staff may use a language-identification card or qualified telephone/video interpretation service when the requested language is not immediately known.

Focused Analysis

For a specific project, public meeting, vital document, or activity that is likely to affect an LEP population, the City will conduct a focused assessment using available demographic information and known community needs to determine appropriate language assistance.

Language Assistance Measures

- Identify the language requested and the nature of the communication.
- Use the City's verified bilingual employees for routine assistance when appropriate and when doing so does not interfere with their primary duties.
- Use qualified interpretation or translation services when accuracy is important, including for vital documents or significant communications.
- Use machine translation only as an aid for basic or routine communication when appropriate; do not rely on a fixed accuracy claim for machine translation.
- Provide translated notices or materials when the four-factor analysis or a focused assessment indicates they are warranted.
- Document significant language-assistance requests and services provided.

Current Bilingual Employee Resources

As of September 2026, the City has identified the following bilingual employee resources. The City will update this information when staffing changes occur.

Department	Employee Count	Language
Utility Services	1	Spanish
Police	1	Spanish

The availability of bilingual employees does not limit the City's ability to obtain other interpretation or translation assistance when needed.

Dissemination of the LEP Plan

Information regarding the City's LEP procedures will be available through the City's Title VI/Nondiscrimination materials. Requests or questions may be directed to:

Travis Askins, Director of Public Works / Title VI Coordinator
City of Aledo
200 Old Annetta Rd.
Aledo, TX 76008
(817) 441-7016, ext. 4202
taskins@aledotx.gov

10. Public Participation Plan

The City will provide meaningful opportunities for the public to participate in City decision-making and federally assisted programs and activities. Public participation methods will be selected based on the subject matter, affected population, legal notice requirements, and known access needs.

Public Meetings and Notices

The City posts agendas and meeting information through its official website and other methods required by law. As of September 2026, regular City Council meetings are held on the first and third Thursday of each month at 6:00 p.m. at the Aledo Municipal Complex. The Planning & Zoning Commission meets on the second Thursday of each month at 6:00 p.m. at the Aledo Municipal Complex. Meeting schedules may change; the official City calendar and posted agendas control.

The City will provide reasonable accommodations and language assistance for public participation when requested or otherwise warranted. Public notices for specific federally assisted projects will include appropriate nondiscrimination and accessibility information.

Outreach Methods

- City website, agendas, notices, and meeting materials;
- Public meetings, hearings, workshops, or open houses;
- Direct notice to affected property owners or stakeholders when appropriate;
- Project signs, mailed notices, electronic communications, social media, or other outreach methods when appropriate; and
- Targeted outreach or translated materials when a focused assessment identifies a need.

Documentation

For significant federally assisted activities, the City will retain appropriate documentation of outreach, comments received, accommodation or language-assistance requests, and responses.

11. Environmental Justice Plan and Process

Purpose and Policy

For federally assisted transportation programs, projects, and activities, the City will identify and address potential disproportionately high and adverse human health or environmental effects on minority and low-income populations. Environmental Justice review will be integrated with Title VI, public participation, Limited English Proficiency, project development, and applicable environmental-review procedures.

Environmental Justice Review Process

For each applicable project or action, the responsible department, in coordination with the Title VI Coordinator, will:

- Define the project or action, the study area, and the populations that may receive benefits or bear burdens;
- Use reasonably available and current demographic, income, geographic, service, complaint, and community information to identify minority and low-income populations, supplementing broad datasets with local or project-specific information when appropriate;
- Identify potential beneficial and adverse effects, including cumulative or indirect effects when required by the applicable project-review process;
- Compare the distribution, severity, duration, and significance of effects and determine whether minority or low-income populations may experience disproportionately high and adverse effects;
- Provide early, meaningful, and accessible opportunities for affected communities to participate, including targeted outreach and language assistance when warranted;
- Evaluate feasible alternatives and measures to avoid, minimize, or mitigate disproportionately high and adverse effects and, when applicable, identify offsetting benefits;
- Coordinate the analysis and proposed resolution with TxDOT or the appropriate federal agency when required; and
- Document the data, outreach, analysis, decisions, commitments, and monitoring or follow-up actions in the project file.

Screening and Documentation

The level of analysis will be proportionate to the scope and potential effects of the action. A documented screening may be sufficient when no minority or low-income population is present or no adverse effect is reasonably anticipated. A more detailed analysis and targeted engagement will be completed when screening identifies a potential disproportionate effect or when TxDOT, FHWA, or another applicable authority requires it.

Annual Monitoring

The Title VI Coordinator will include Environmental Justice activities, public outreach, findings, complaints, commitments, and needed corrective actions in the annual Title VI review, as applicable.

12. Complaint Procedures

Who May File

Any person or organization believing that they have been subjected to discrimination prohibited by Title VI in a City program or activity may file a complaint. Title VI protects against discrimination based on race, color, or national origin. Complaints alleging discrimination under other laws will be routed to the appropriate process or agency.

Time for Filing

A Title VI complaint should be received no more than 180 days after the alleged incident unless the time for filing is extended by the processing agency.

How to File

Complaints should be in writing and signed and may be submitted by mail, email, in person, or by another accessible method accepted by the City. The City will provide reasonable assistance to a person who needs help documenting a complaint.

A complaint should include, to the extent available:

- A description of the alleged discriminatory action;
- The complainant's name and contact information;
- The basis of the complaint (race, color, or national origin);
- The name of the person, contractor, department, or other respondent alleged to have discriminated;
- Sufficient facts to explain why the complainant believes discrimination occurred in a program or activity receiving federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

City Contact

Title VI complaints may be submitted to:
Travis Askins, Title VI/Nondiscrimination Coordinator
City of Aledo
200 Old Annetta Rd., Aledo, TX 76008
(817) 441-7016, ext. 4202
taskins@aledotx.gov

Processing and Referral

Upon receipt of a Title VI complaint, the Title VI Coordinator will promptly review the complaint for completeness, document it in the City's Title VI Complaint Log, and acknowledge receipt as appropriate. If additional information is needed to understand or route the complaint, the Coordinator may request it from the complainant.

The City will ensure that Title VI complaints are forwarded to the appropriate authority for disposition. Complaints involving the Federal-aid highway program will be referred to the Texas Department of Transportation (TxDOT) Civil Rights Division for processing through the applicable FHWA process. The City will cooperate with TxDOT, FHWA, or another appropriate agency and provide requested records or information as permitted by law.

The City will not represent its administrative review as a substitute for the investigation or final disposition assigned to TxDOT, FHWA, or another agency with jurisdiction.

Direct Filing

A complainant may submit a complaint directly to TxDOT or the appropriate federal agency. The City will provide current filing information upon request and will maintain current complaint resources with its Title VI materials.

No Internal Appeal of External Agency Decision

Because complaints referred to TxDOT/FHWA are processed under the applicable external agency procedures, the City will not use a separate internal City appeal committee to review or overturn the disposition of a complaint assigned to TxDOT/FHWA. Any review or appeal rights will be those provided by the processing agency.

Confidentiality and Records

Complaint records will be maintained in accordance with applicable records-retention, confidentiality, and public-disclosure requirements. Retaliation against a person for filing a complaint or participating in a complaint process is prohibited.

13. Data Collection and Monitoring

The City will collect and review data reasonably necessary to evaluate Title VI compliance. Depending on the program or activity, this may include demographic information, service-area information, complaints, public participation records, language-assistance requests, contracting information, and project-specific data.

Data collection will be proportionate to the activity and will respect applicable privacy and records requirements.

14. Annual Work Plan and Accomplishment Report

At least annually, the Title VI Coordinator will review implementation of this plan and document planned actions and accomplishments. The annual review should address, as applicable:

- Title VI training completed and planned;
- Complaints received, referrals made, status, and disposition when known;
- LEP requests, language assistance provided, and needed updates to language resources;
- Public participation and outreach for significant federally assisted activities;
- Environmental Justice screenings, analyses, outreach, findings, and mitigation or monitoring commitments;
- Program-area reviews and any corrective actions;
- Contract/procurement compliance activities;
- Changes in federal funding, programs, staffing, demographics, or procedures that affect the plan; and
- Goals or actions for the next reporting period.

15. Training

Relevant City employees will receive Title VI/Nondiscrimination training appropriate to their responsibilities. Training may include Title VI fundamentals, complaint routing, LEP assistance, Environmental Justice, public participation, data collection, contracting requirements, program and subrecipient reviews, corrective action, and responsibilities under this plan.

16. Record Retention

The City will retain Title VI records in accordance with applicable federal requirements and the City's adopted records-retention schedule. Where different retention periods apply, the City will follow the controlling requirement.

17. Plan Review and Updates

The Title VI Coordinator will review this plan periodically and update it when necessary due to changes in law, TxDOT/FHWA guidance, City organization, federal funding, demographics, procedures, or designated personnel. Material changes should be approved through the City's appropriate administrative process.

Attachments

The following attachments are part of the City's Title VI/Nondiscrimination program. Items marked "CITY TO COMPLETE" must be finalized before adoption/submission.

No.	Attachment	Status
Attachment 1	Title VI/Nondiscrimination Policy Statement	Included below; signature/date required.
Attachment 2	Standard DOT Title VI Assurances and Appendices A-E	Included below; complete recipient-specific blanks and obtain signature/date.
Attachment 3	Employee Acknowledgment	Included below.
Attachment 4	LEP Language Assistance Request Log	Included below.
Attachment 5	Title VI Complaint Form	Included below.
Attachment 6	Title VI Complaint Log	Included below.
Attachment 7	Title VI Notice to the Public (English/Spanish)	Included below.
Attachment 8	LEP Interpreter Services Poster (English/Spanish)	Included below; post at appropriate public-facing locations.
Attachment 9	Current Federal-Aid Contract Provisions	CITY TO COMPLETE by project: verify current TxDOT/FHWA provisions at solicitation.

Attachment 1 - Title VI/Nondiscrimination Policy Statement

The City of Aledo, Texas, is committed to a policy of nondiscrimination in the conduct of its programs, services, and activities. No person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance, consistent with Title VI of the Civil Rights Act of 1964.

The City will take reasonable steps to provide meaningful access to LEP persons and will administer other applicable nondiscrimination requirements in accordance with governing law.

Any person who believes they have been subjected to discrimination may contact the City's Title VI/Nondiscrimination Coordinator for information about filing a complaint.

Travis Askins, Director of Public Works / Title VI Coordinator
City of Aledo
200 Old Annetta Rd.
Aledo, TX 76008
(817) 441-7016, ext. 4202
taskins@aledotx.gov

Candice Edmondson, City Manager

Date: _____

Attachment 2 - U.S. DOT Standard Title VI/Nondiscrimination Assurances

The complete official TxDOT U.S. DOT Standard Title VI/Nondiscrimination Assurances packet (DOT Order No. 1050.2A, Rev. 05/26), including Appendices A-E, follows. The recipient fields are completed for the City of Aledo; the authorized official must sign and date the assurance on official packet page 5 before adoption or submission.

The United States Department of Transportation (USDOT) Standard Title VI/Nondiscrimination Assurances

DOT Order No. 1050.2A

The City of Aledo, Texas (herein referred to as the "Recipient"),
HEREBY AGREES THAT, as a condition to receiving any Federal financial
assistance from the U.S. Department of Transportation (DOT), through the
Federal Highway Administration (FHWA), is subject to and will comply with
the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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,"

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for which the Recipient receives Federal financial assistance from U.S. DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally-assisted U.S. DOT programs:

1. The Recipient agrees that each "activity," facility," or "program," as defined in §§ 21.23(b) and 21.23(e) or 49 C.P.R § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-aid highway program and, in adapted form, in all proposals for negotiated agreements regardless of funding source: *"The Recipient, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§2000d to 2000d-4) and the Regulations, hereby notifies all*

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bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and Appendix E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.

8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods.
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this assurance, the Recipient also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the U.S. DOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the U.S.

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DOT. You must keep records, reports, and submit the material for review upon request to U.S. DOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Recipient gives this assurance in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. DOT under all Department of Transportation Programs. This assurance is binding on Texas, other recipients, subrecipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in all Department of Transportation programs. The person(s) signing below is/are authorized to sign this assurance on behalf of the Recipient.

City of Aledo, Texas

Title of Recipient

Signature of Authorized Official

Date

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Appendix A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. Compliance with Regulations: The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, the FHWA, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. Non-discrimination: The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.

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4. Information and Reports: The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance: In the event of a contractor's noncompliance with the Nondiscrimination provisions of this contract, the Recipient will impose such contract sanctions as it or FHWA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies, and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. Incorporation of Provisions: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the

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Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Appendix B: Clauses for Deeds Transferring United States Property

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the City of Aledo, Texas will accept title to the lands and maintain the project constructed thereon in accordance with all applicable federal statutes, the Regulations for the Administration of all DOT programs, and the policies and procedures prescribed by FHWA of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42

U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto City of Aledo, Texas the all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto City of Aledo, Texas and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real

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property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the City of Aledo, Texas, its successors and assigns.

The City of Aledo, Texas, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the City of Aledo, Texas will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [,] and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of

*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

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Transportation and its assigns as such interest existed prior to this instruction].*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

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Appendix C: Clauses for Transfer or Real Property Acquired or Improved Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Recipient pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, City of Aledo, Texas will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold

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the same as if the (lease, license, permit, etc.) had never been made or issued.*

- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, City of Aledo, Texas will have the right to enter or re-enter the lands and facilities thereon, and the above-described lands and facilities will there upon revert to and vest in and become the absolute property of the City of Aledo, Texas and its assigns. *

*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

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Appendix D: Clauses for Construction/Use/Access to Real Property Acquired Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the Recipient pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, City of Aledo, Texas will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities

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thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

- C. With respect to deeds, in the event of breach of any of the above non-discrimination covenants, City of Aledo, Texas will there upon revert to and vest in and become the absolute property of City of Aledo, Texas and its assigns.

*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

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Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following nondiscrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the

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Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);

- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Attachment 3 - Employee Acknowledgment

I acknowledge that I have been informed of the City of Aledo Title VI/Nondiscrimination Plan and understand that City employees are expected to perform their duties in a nondiscriminatory manner and to promptly refer discrimination complaints or Title VI concerns to the Title VI/Nondiscrimination Coordinator.

Employee Name: _____

Department: _____

Signature: _____ Date: _____

Attachment 4 - LEP Language Assistance Request Log

Date	Language	Program/Activity	Assistance Provided	Documents/Materials	Cost/Notes

Use this log to document significant requests or interactions requiring language assistance. Do not include unnecessary sensitive personal information.

Attachment 5 - Title VI Complaint Form

City of Aledo, Texas

Complainant Name: _____

Mailing Address: _____

City/State/ZIP: _____

Phone: _____ Email: _____

Preferred method of contact: _____

Name of person/organization alleged to have discriminated: _____

Date(s) of alleged discrimination: _____

Basis of complaint (check all that apply): ☐ Race ☐ Color ☐ National Origin

Describe what happened, including the program, service, activity, or project involved. Attach additional pages or documents if needed:

If you have filed this complaint with another agency or court, identify the agency/court and date filed:

Signature: _____ Date: _____

Submit to: Travis Askins, Title VI/Nondiscrimination Coordinator, City of Aledo, 200 Old Annetta Rd., Aledo, TX 76008; taskins@aledotx.gov; (817) 441-7016, ext. 4202.

The City will provide reasonable assistance to persons who need help completing this form. Complaints should be received within 180 days of the alleged discrimination unless the filing period is extended by the processing agency.

Attachment 6 - Title VI Complaint Log

Date Received	Complainant	Basis	Program/Respondent	Referral Agency/Date	Status	Disposition/Date

Attachment 7 - Title VI Notice to the Public

YOUR RIGHTS UNDER TITLE VI

The City of Aledo operates its programs, services, and activities without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964.

If you believe you have been subjected to discrimination in a City program or activity, or if you need language assistance to access City information or services, contact:

Travis Askins
Director of Public Works / Title VI Coordinator
City of Aledo
200 Old Annetta Rd., Aledo, TX 76008
(817) 441-7016, ext. 4202
taskins@aledotx.gov

A Title VI complaint should be received no more than 180 days after the alleged incident unless the filing period is extended by the processing agency. The City can provide reasonable assistance with the complaint process.

SUS DERECHOS BAJO EL TÍTULO VI

La Ciudad de Aledo administra sus programas, servicios y actividades sin discriminación por raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles de 1964.

Si considera que ha sido objeto de discriminación en un programa o actividad de la Ciudad, o si necesita asistencia lingüística gratuita para acceder a información o servicios de la Ciudad, comuníquese con:

Travis Askins
Director de Obras Públicas / Coordinador del Título VI
Ciudad de Aledo
200 Old Annetta Rd., Aledo, TX 76008
(817) 441-7016, ext. 4202
taskins@aledotx.gov

La queja bajo el Título VI debe recibirse dentro de los 180 días siguientes al supuesto incidente, a menos que la agencia encargada del trámite amplíe el plazo. La Ciudad puede brindar asistencia razonable durante el proceso de queja.

Attachment 8 - LEP Interpreter Services Poster (English/Spanish)

FREE LANGUAGE ASSISTANCE

Free interpreter services are available at no cost.
Please ask someone at the front desk or call (817) 441-7016, ext. 4202.

ASISTENCIA LINGÜÍSTICA GRATUITA

Hay servicios gratuitos de interpretación disponibles sin costo.
Solicite ayuda en la recepción o llame al (817) 441-7016, ext. 4202.

City of Aledo | Title VI/Nondiscrimination