



Title VI Plan August 2026

City of Corpus Christi
1201 Leopard St
Corpus Christi, TX 78401



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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Several other federal legal authorities supplement Title VI by extending protections based on age, sex, and disability. In addition, the Civil Rights Restoration Act of 1987 clarified Title VI enforcement mandating that Title VI requirements apply to all programs and activities of federal-aid recipients regardless of whether any particular program or activity involves federal funds. Taken together, these laws require recipients and subrecipients of federal funds to ensure all programs and services are delivered to the public without discrimination.

The City of Corpus Christi, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); 49 C.F.R. Part 21; and related statutes and regulations. The City of Corpus Christi acknowledges it is subject to and will comply with the U.S. Constitution and Federal Highway Administration Title VI Assurances.

This plan explains how the City of Corpus Christi incorporates the requirements of Title VI and related legal authorities into its operations. The plan will be used as a reference for the City of Corpus Christi and an informational resource for the public. The plan will be updated every 3 years to reflect changes in Title VI compliance operations.



Discrimination under Title VI

It is the responsibility of every City of Corpus Christi employee to prevent, minimize, and eradicate any form of discrimination. There are two types of discrimination prohibited under Title VI and its related statutes: (1) disparate treatment that alleges similarly situated persons are treated differently because of their race, color, or national origin (i.e., intentional discrimination); and (2) disparate impact/effects when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of a protected group. The focus of disparate impact is on the consequences of a decision, policy, or practice rather than the intent.

Prohibited forms of discrimination may include, but not be limited to, the following actions taken in violation of the U.S. Constitution or provisions of Title VI:

- The denial of services, financial aid, or other benefits provided under a program.
- Distinctions in the quality, quantity, or manner in which a benefit is provided.
- Segregation or separation of persons in any part of the program.
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others.
- Differing standards or requirements for participation.
- Methods of administration that directly or indirectly, or through contractual relationships would defeat or impair the accomplishment of effective nondiscrimination; or
- Discrimination in any activities or services related to a highway, infrastructure or facility built or repaired in whole or in part with federal funds.

The City of Corpus Christi's efforts to prevent such discrimination must address, but not be limited to, how a program or activity:

- Impacts the public.
- Provides accessibility.
- Provides equal access to benefits.
- Encourages participation.
- Provides services equitably.
- Initiates contracting and training opportunities.
- Investigates complaints.
- Allocates funding
- Prioritizes projects.



Authorities

The authorities applicable to the City of Corpus Christi's Title VI Plan include:

- **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 CFR Part 21** (entitled Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of The Civil Rights Act of 1964).
- **23 CFR Part 200** (FHWA's Title VI/Nondiscrimination Regulation).
- **28 CFR Part 50.3** (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964); and,
- **Texas Administrative Code §9.4, Civil Rights – Title VI Compliance**

Title VI Policy Statement

It is the policy of the City of Corpus Christi that no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the City of Corpus Christi as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the City of Corpus Christi, including its contractors and anyone who acts on behalf of the City of Corpus Christi. This policy also applies to the operations of any department or agency to which the City of Corpus Christi extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

The nondiscrimination statement signed by the City Manager, Peter Zanoni, is included as **Attachment 1**.



Standard DOT Assurances

The U.S. DOT requires that federal financial assistance be provided on the condition that the recipient provides an assurance that its programs and activities will be conducted in compliance with Title VI of the Civil Rights Act of 1964. The requirement is located at 49 CFR 21.7(a). To support the implementation of this requirement, the U.S. DOT provided an assurances agreement in U.S. DOT Order 1050.2A that federal fund recipients and subrecipients must sign as a condition of receiving federal financial assistance.

The assurances agreement provides specific non-discrimination language, the City of Corpus Christi is required to include in bid solicitations or requests for proposal, contracts, and real estate agreements. The City of Corpus Christi is committed to ensuring the necessary language is used as prescribed in the assurances agreement.

In accordance with this requirement, the City of Corpus Christi has signed the U.S. DOT Standard Title VI/Non-Discrimination Assurances. The document is attached as **Attachment 2**.



Organization and Staffing

City Manager, Peter Zaroni, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 C.F.R. Part 200 and 49 C.F.R. Part 21.

The City of Corpus Christi has assigned Katie Martin, Title VI Coordinator, Public Works Finance Planner, to perform the duties of the Title VI Coordinator and ensure implementation of the agency's Title VI program.

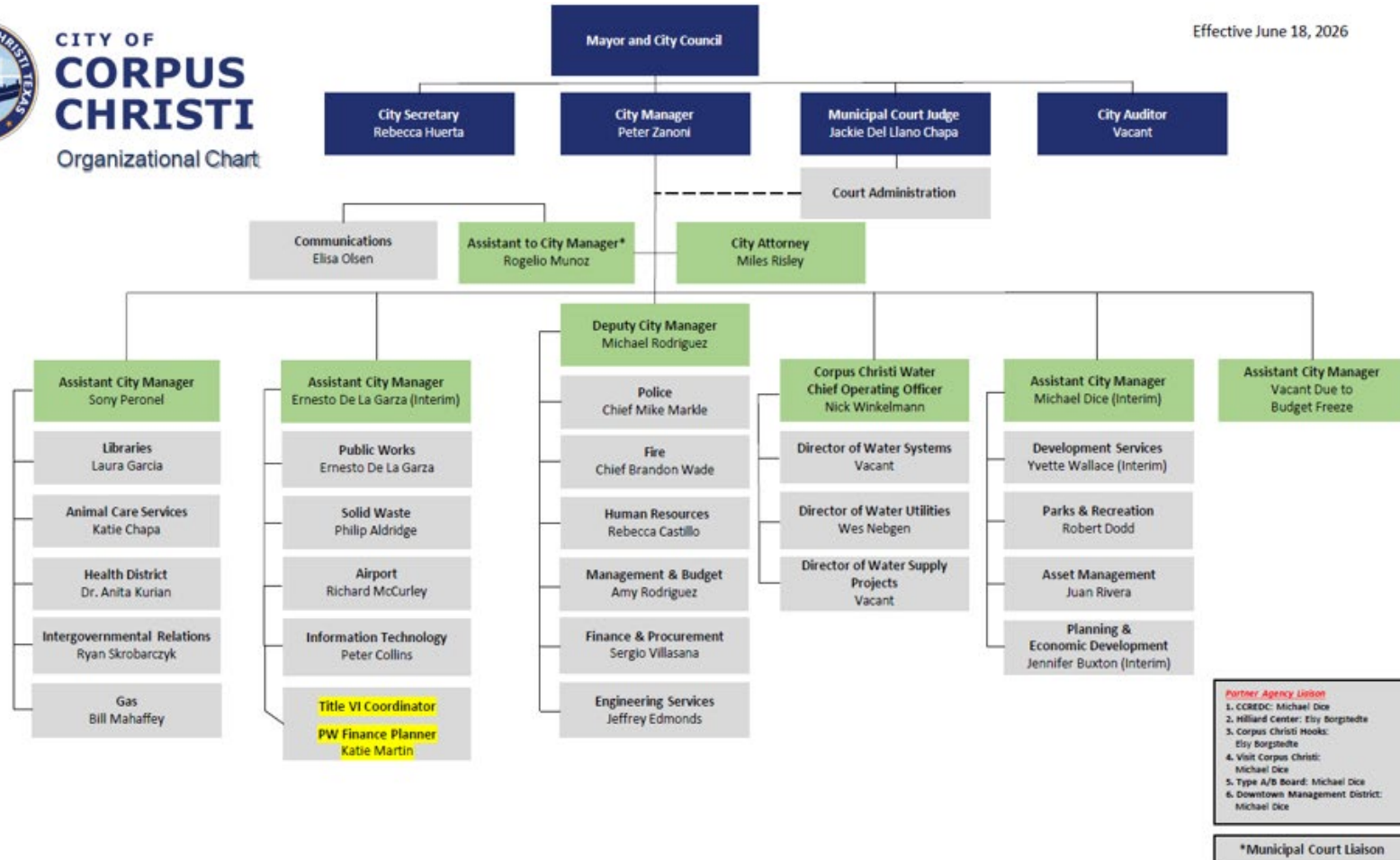
The Title VI Coordinator is responsible for:

- Maintaining and updating the Title VI plan on the agency's behalf.
- Ensuring relevant agency staff receive necessary Title VI training.
- Ensuring prompt processing of Title VI complaints and referral to Texas Department of Transportation.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas; and
- Developing Title VI information for dissemination internally and externally.



CITY OF
**CORPUS
CHRISTI**
Organizational Chart

Effective June 18, 2026





Primary Program Area Descriptions & Review Procedures

The City of Corpus Christi engages in the following program areas:

Program Area and General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
<u>Right of Way:</u> Issues public right of way permits for construction, transportation, business, and other activities. Coordinates relocation of citizens whose property has been acquired for a right of way.	Public right of way permits and relocations should not create unfair burdens. Collecting demographic data from property owners who may be subject to right of way activities. Ensuring property owners impacted by right of way activities are made aware of their right to be free from discrimination on the basis of race, color, or national origin under Title IV of the Civil Rights Act of 1964.	Reviewing permits and relocations to ensure nondiscrimination. Ensure demographic data is part of necessary right of way templates or forms. Ensure Title IV notice is consistently provided to property owners impacted by right of way activities.
<u>Planning:</u> Short-term and long-term planning of transportation projects	Ensuring comprehensive public participation to ensure all stakeholders have a chance to voice their opinions. Collecting demographic data from public engagement activities regarding demographics of public participants. Providing language access as needed.	Review planning decisions to ensure nondiscrimination. Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Documenting language access requests.
<u>Public Engagement:</u> Comprehensive public participation to ensure all stakeholders have an opportunity to voice their opinions. .	Comprehensive public participation to ensure all stakeholders have an opportunity to voice their opinions. Collecting demographic data from public engagement activities regarding demographics of public participants. Providing language access as needed. Disseminating Title VI information to the public to ensure they are aware of their rights to be free from discrimination.	Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Documenting language access requests.



Contracting:

Develops and manages contracts and contracting opportunities, including specifications, bidding process and contract execution.

Maintaining an open and fair bidding process for all contracts.

Ensure Title VI Assurances appendices are included in contracts as specified within the assurances document.

Reviewing contracts for necessary Title VI language.

Reviewing any available data on contract recipients to ensure nondiscrimination in contracting.

Reviewing bidding procedures to ensure nondiscrimination and equal opportunity.

Maintenance:

Services roadways and right of ways, including, but not limited to, providing: Repair Signage Drainage Snow and ice removal

Ensuring no communities are subject to a disparate lack of maintenance services based on a protected class.

Reviewing resources provided to the community and determining whether any protected class communities have disproportionately benefited or been harmed by the delivery of maintenance services.



Data Collection and Analysis

Program Area	Type of Data Collected & Process for Collecting	Purpose for Collecting the Data
Right of Way	Collecting demographic data from property owners who may be subject to right of way activities by including inputs for demographic data on the field title report form.	Ensuring right of way activities do not disproportionately affect individuals or groups based on a protected class status.
Planning	Reviewing data from the U.S. Census Bureau and other credible sources to determine demographic make-up of the local community.	Ensuring project impacts do not disproportionately impact any individuals or groups based on a protected class status.
Public Engagement	Reviewing data from the U.S. Census Bureau and other credible sources to determine demographic make-up of the local community. Providing demographic questionnaires to public engagement participants and including demographic questions in public surveys.	Ensuring communications and interactions with the public sufficiently reach all local demographics.
Contracting	Identifying contractors who are a: Disadvantaged Business Enterprise (DBE) Historically Underutilized Business (HUB) Small Business Enterprise (SBE)	Ensuring equal opportunity in contracting to all individuals and groups.
Maintenance	Reviewing maintenance activities by geography and demographic makeup of communities receiving the maintenance services	Ensuring no communities are subject to a disparate lack of maintenance services based on a protected class.

Potential Sources of data and analysis tools include:

- Census Data
- American Community Survey
- School Districts
- Forms or Surveys from the public
- City of Corpus Christi MPO Committee
- City of Corpus Christi Committee for Persons with Disabilities
- City of Corpus Christi Planning Commission
- City of Corpus Christi Parks and Recreation Advisory Committee
- Field Observations



Title VI Complaint Procedures

Scope of Title VI Complaints

No person or groups of persons shall, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the City of Corpus Christi, and its contractors on the grounds of race, color, or national origin.

The scope of Title VI covers all internal and external activities of the City of Corpus Christi.

The following types of actions are prohibited under Title VI protections (See [eCFR :: 49 CFR Part 21 -- Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964](#))

- Excluding individuals or groups from participation in programs or activities.
- Denying program services or benefits to individuals or groups.
- Providing a different service or benefit or providing them in a manner different from what is provided to others.
- Denying an opportunity to participate as a member of a planning, advisory or similar body that is an integral part of the program.
- Retaliation for making a complaint or otherwise participating in any manner in an investigation or proceeding related to Title VI of the Civil Rights Act of 1964.

How to File a Formal Title VI Complaint

Any person(s) or organization(s) believing they have been discriminated against on the basis of the protected classes stated above by the City of Corpus Christi or its contractors may file a Title VI complaint.

Discrimination complaints must be received no more than 180 days after the alleged incident unless the time for filing is extended by the processing agency.

Complaints should be in writing and signed and may be filed by mail, fax, in person, or e-mail. A complaint should contain the following information:

- A written explanation of the alleged discriminatory actions.
- The complainant's contact information, including, if available: full name, postal address, phone number, and email address.
- The basis of the complaint (e.g., race, color, national origin, etc.).
- The names of specific persons and respondents (e.g., agencies/organizations) alleged to have discriminated.
- Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is on-going.

Complainants are encouraged to submit complaints directly to the Texas Department of Transportation (TxDOT).



Complaints can also be filed by completing and submitting the City of Corpus Christi Title VI Complaint Form available at [Home | City of Corpus Christi](#) and mailing a letter with the necessary information to:

City of Corpus Christi Public Works

2525 Hygeia

Corpus Christi, TX 78415

katiem2@corpuschristitx.gov

361-826-2319

If necessary, the complainant may call the phone number above and provide the allegations by telephone. The Title VI Coordinator will transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the complainant for correction and signature.

Complaints can also be filed directly with the following agencies:

Federal Highway Administration

U.S. Department of Transportation Office of Civil Rights

HCR-20, Room E81-320

1200 New Jersey Avenue, SE

Washington, DC 20590

Email: CivilRights.FHWA@dot.gov

Texas Department of Transportation

Civil Rights Division

Attn: Title VI Program Manager

125 E. 11th Street Austin, Texas 78701

After submitting a complaint, the complainant will receive correspondence informing them of the status of the complaint within ten (10) business days from the City of Corpus Christi or other agency receiving the complaint.

Los siguientes procedimientos se aplican a las denuncias presentadas en virtud del Título VI de la Ley de Derechos Civiles de 1964 y la Ley de Restauración de los Derechos Civiles de 1987. Cualquier persona que considere que ella misma, o cualquier clase específica de personas, es objeto de discriminación prohibida por motivos de raza, color o nacionalidad, puede presentar una denuncia por escrito, ya sea individualmente o a través de un representante. La queja debe presentarse a más tardar 180 días después de la fecha de la supuesta discriminación, a menos que suceda de manera continua o que la FHWA extienda el plazo para presentar la queja. Las quejas relacionadas con el programa federal de ayuda a las carreteras pueden presentarse ante el Departamento de Transporte de Texas (TxDOT), la Oficina Divisional de la Administración Federal de Carreteras (FHWA), la Oficina de Derechos Civiles (HCR) de la sede central de la FHWA, la Oficina Departamental de Derechos Civiles del Departamento de Transporte de los Estados Unidos (USDOT) o el



Departamento de Justicia de los Estados Unidos (USDOJ). The City of Corpus Christi se asegurará de que todas las quejas se envíen a la autoridad competente para su resolución. Las quejas por presuntas violaciones del Título VI por parte de los subreceptores pueden presentarse por escrito directamente ante las siguientes agencias locales, estatales y federales:

City of Corpus Christi Public Works

A la atención de: Coordinador del Título VI
2525 Hygeia
Corpus Christi, TX 78415
katiem2@corpuschristitx.gov

Además, las quejas presentadas contra el subreceptor también pueden presentarse ante el Departamento de Transporte de Texas (TxDOT) o la Administración Federal de Carreteras (FHWA) en:

Texas Department of Transportation

Civil Rights Division
A la atención de: Title VI Program Administrator
125 E. 11th Street
Austin, TX 78701

Federal Highway Administration

Office of Civil Rights
HCR-20, Room E81-320
1200 New Jersey Avenue, SE
Washington, DC 20590
Email: CivilRights.FHWA@dot.gov

Los expedientes de denuncias e investigaciones son confidenciales. El contenido de dichos archivos solo se revelará al personal adecuado, las autoridades estatales y federales, de conformidad con las leyes federales y estatales. The City of Corpus Christi conservará los archivos de acuerdo con los calendarios de conservación de registros y todas las directrices federales.

Complaints received by the City of Corpus Christi's Title VI Coordinator are forwarded to the TxDOT Office of Civil Rights (OCR). TxDOT OCR will forward the complaint to the FHWA Texas Division Office, along with a preliminary processing recommendation. The FHWA Texas Division Office will forward the complaint to FHWA Headquarters Office of Civil Rights (HCR). FHWA HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints.



There are four potential outcomes for processing complaints:

- **Accept:** if a complaint is timely filed, contains sufficient information to support a claim under Title VI, and concerns matters under the FHWA's jurisdiction, then HCR will send to the complainant, the respondent agency, and the FHWA Texas Division Office a written notice that it has accepted the complaint for investigation.
- **Preliminary review:** if it is unclear whether the complaint allegations are sufficient to support a claim under Title VI, then HCR may (1) dismiss it or (2) engage in a preliminary review to acquire additional information from the complainant and/or respondent before deciding whether to accept, dismiss, or refer the complaint.
- **Procedural Dismissal:** if a complaint is not timely filed, is not in writing and signed, or features other procedural/practical defects, then HCR will send the complainant, respondent, and FHWA Texas Division Office a written notice that it is dismissing the complaint.
- **Referral\Dismissal:** if the complaint is procedurally sufficient but FHWA (1) lacks jurisdiction over the subject matter or (2) lacks jurisdiction over the respondent entity, then HCR will either dismiss the complaint or refer it to another agency that does have jurisdiction. If HCR dismisses the complaint, it will send the complainant, respondent, and FHWA Division Office a copy of the written dismissal notice. For referrals, FHWA will send a written referral notice with a copy of the complaint to the proper Federal agency and a copy to the USDOT Departmental Office of Civil Rights.

Complaints are not investigated by the City of Corpus Christi. FHWA HCR is responsible for investigating all complaints. FHWA HCR may also delegate the investigation to TxDOT OCR, who would then conduct all data requests, interviews, and analysis and create a Report of Investigation (ROI). TxDOT OCR will have sixty (60) business days from the date the investigation is delegated to prepare the ROI and send it to HCR. HCR will review the ROI and compose a Letter of Finding based on the ROI.

For further information about the FHWA investigation process and potential complaint outcomes, please visit the [Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964.](#)



Complaint Log

The City of Corpus Christi maintains a complaint log to document all activity related to the complaint. Information captured includes:

- Complainant's name, and if provided, race, color, and national origin.
- Respondent's name
- Basis(es) of the discrimination complaint
- Allegation(s)/Issue(s) surrounding the discrimination complaint
- Date the discrimination complaint was filed
- Date the investigation was complete
- Disposition
- Disposition date
- Other pertinent information

	Date (Month, Day & Year)	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. Complaint filed for selecting Hillcrest as desal site facility	10/26/22	Formally withdrawn after investigation	CLOSED	Reported to TxDot and FHWA
2.				
3.				
Lawsuits				
1.				
2.				
3.				
Complaints				
1. Complaint filed for selecting Hillcrest as desal site facility	10/26/22	Formally withdrawn after investigation	CLOSED	Reported to TxDot and FHWA
2.				
3.				



Notice of Rights

In accordance with 23 CFR 200.9(a)(12), the City of Corpus Christi is required to develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English. Notice of the City of Corpus Christi's Title VI policies and procedures are listed in places such as online and at City Hall.

Notification to Beneficiaries

The City of Corpus Christi website is continuously updated 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. Title VI information available on the City of Corpus Christi's website includes:

- The City of Corpus Christi Title VI/Nondiscrimination Plan and Nondiscrimination Assurances
- Title VI and Related Statutes Nondiscrimination Statement (English and Spanish)
- TxDOT's External Discrimination Complaint Form (English and Spanish)
- Title VI Poster
- City of Corpus Christi Language Assistance Plan
- City of Corpus Christi Municipal Courthouse
- La Retama Central Library



Public Involvement

It is the goal of the City of Corpus Christi to provide continuous, effective and transparent access to all stakeholders. The City of Corpus Christi strives to inform all stakeholders about proposed plans and projects and seeks input when appropriate. The City of Corpus Christi utilizes the following methods to communicate information regarding upcoming activities and opportunities for public and stakeholder participation in the planning process:

- Newsletters/mailings: [Newsletters & Annual Reports | City of Corpus Christi](#)
- Email blasts
- Online engagement platforms
- Media releases
- Local community public meetings:
[City to Hold Third Community Input Sessions for FY 2026 Proposed Budget | City of Corpus Christi](#)
- City of Corpus Christi website: [Home | City of Corpus Christi](#)
- MPO websites : [Corpus Christi Metropolitan Planning Organization](#)
- Facebook [City of Corpus Christi - Government | Corpus Christi TX | Facebook](#)

Traditionally underserved communities can find it more difficult to engage with decision making entities due to scheduling conflicts, lack of transportation to public involvement events, language barriers, lack of childcare, etc. Genuine public involvement takes place at all levels and so the City of Corpus Christi aims to identify communities that may be affected by a project in order to plan appropriately and effectively for the potentially impacted groups. Sources of data used were listed above in the Data Gathering section. The City of Corpus Christi specifically uses the following sources to identify minority and populations with limited English proficiency:

- ACS Table B16001 – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over
- US CENSUS TABLE P9 – HISPANIC OR LATINO AND NOT HISPANIC OR LATINO BY RACE

The City of Corpus Christi will use the following techniques to ensure that all members of the community have the opportunity to participate in the decision-making process:

- Holding meetings at different times or on the weekend
- Holding meetings at locations in neighborhoods like schools or parks
- Providing virtual options
- Translating documents into languages other than English
- Holding events accessible by public transportation



Language Assistance and Limited English Proficiency

In accordance with Title VI of the Civil Rights Act of 1964, the City of Corpus Christi is committed to ensuring meaningful access to programs and services for individuals with limited English proficiency (LEP). The City recognizes that effective communication is essential to providing fair and equitable service to community members and will take reasonable steps to provide language assistance, at no cost to the individual. These efforts help prevent discrimination based on national origin and promote full participation in the City of Corpus Christi programs.

Individuals with limited English proficiency are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English as a result of their national origin. Under Title VI, these individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

According to the U.S. Census Bureau's American Community Survey, Corpus Christi, Texas has a population of approximately 295,167 people aged five and over.

- An estimated 182,265 individuals or approximately 61.7% speak only English at home.
- An estimated 112,902 individuals or approximately 38.3% speak a language other than English at home.

Among those who speak a non-English language:

- Spanish is by far the most common, spoken by 104,950 or 35.5% of the population.
- Other languages including French, Italian, German, Greek, Japanese, Chinese, Vietnamese and numerous other languages are spoken by 7,952 individuals or 2.6% of the population.

These figures show that while the majority of Corpus Christi residents speak only English, 38.3% of the population uses another language at home with Spanish being the predominant non-English language.

The City of Corpus Christi will assess the how frequently it engages individuals with limited English proficiency, recognizing that this frequency may vary depending on the nature of the City projects, events, and services. While general awareness of upcoming policies, programs, and initiatives is useful, the need for language access should be evaluated on a project-by-project basis, taking into account the scope, location, and potential community impact.

The City of Corpus Christi understands the importance of analyzing the City's diverse population in relation to upcoming programs, activities, and services. Each situation will be assessed individually, and the City will take appropriate and reasonable action to ensure meaningful access to information and services for limited English proficiency populations.



The City of Corpus Christi will continue its ongoing efforts to ensure that LEP individuals have access to benefits, services, and information offered by the City of Corpus Christi.

Number or Proportion of LEP persons in eligible service population.

According to the US Census Bureau, the City of Corpus Christi has an estimated 112,902 individuals (or approximately 38.3%) of the population speaking a language other than English at home. An analysis of the American Community Survey identified approximately 28,056 Limited English Proficient persons representing 9.5% of the population age five years and older. Spanish speaking residents comprise the majority of the LEP population with approximately 25,512 individuals or 8.6% of the population age five years and older.

Frequency with which LEP individuals come in contact with the program.

The City of Corpus Christi handled over 105,000 calls for the fiscal year of 2025-2026. Of which, 4,091 were conducted in the Spanish language. To date there has been no other language requested for assistance. The City of Corpus Christi has determined that encounters with Spanish speaking individuals occur on a regular basis and require language assistance measures.

Importance of the service provided by the program.

The City of Corpus Christi also develops and distributes vital information in Spanish. Failure to provide meaningful access could prevent LEP individuals from participating in public decision making or obtaining municipal services. Therefore, language assistance is considered vital for communication. As such, the City of Corpus Christi employs bilingual customer service representatives and employs numerous bilingual employees to interact and communicate with individuals. Additionally, third party translation programs such as Language Line Solutions for individual interactions and Elfsight for web translations are available. In Fiscal Year 25-26, the City of Corpus Christi distributed numerous Spanish language news releases which included emergency notifications. Additionally, a variety of safety messages are translated and distributed in Spanish multiple times a year including information on elections, safe digging, beach safety, hurricane preparedness, and heat and cold weather advisories.

Resources available by the agency.

Four customer service representatives are bi-lingual and able to communicate with residents needing assistance with limited English. The City of Corpus Christi also employs two full-time leadership public information officers who conduct television and radio interviews in Spanish and translate news releases and written materials as needed for a variety of departments. The City of Corpus Christi also utilizes language line solutions for translation services and the website has a direct resource to translate from English to Spanish as seen below.



This service is provided by a third-party company, Elfsight, linked here.

<https://elfsight.com/website-translator-widget/features/>

It also provides services to translate pdf documents from English to Spanish. It is provided by a third-party company, Docaccess, linked here.

<https://docaccess.com/#accordion-translate>

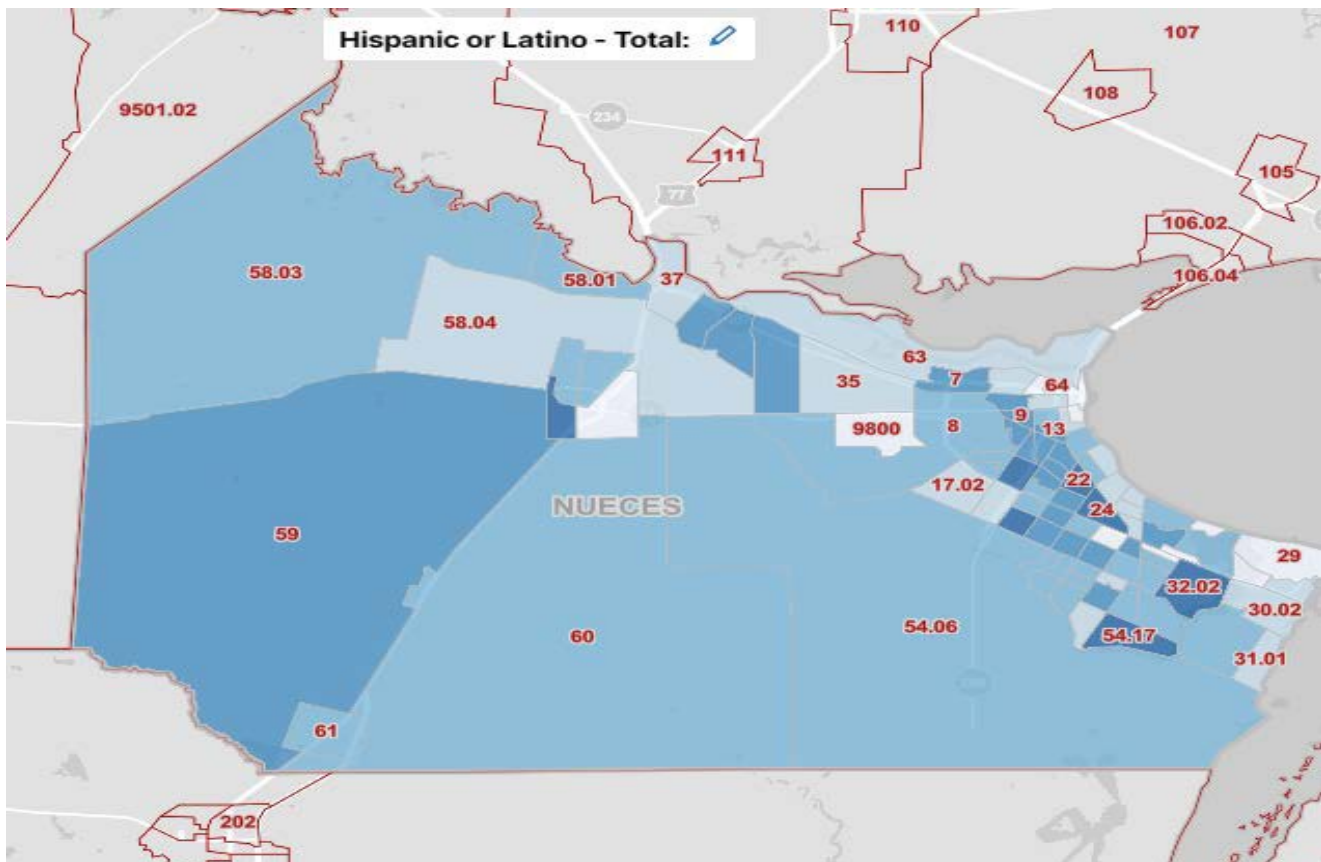
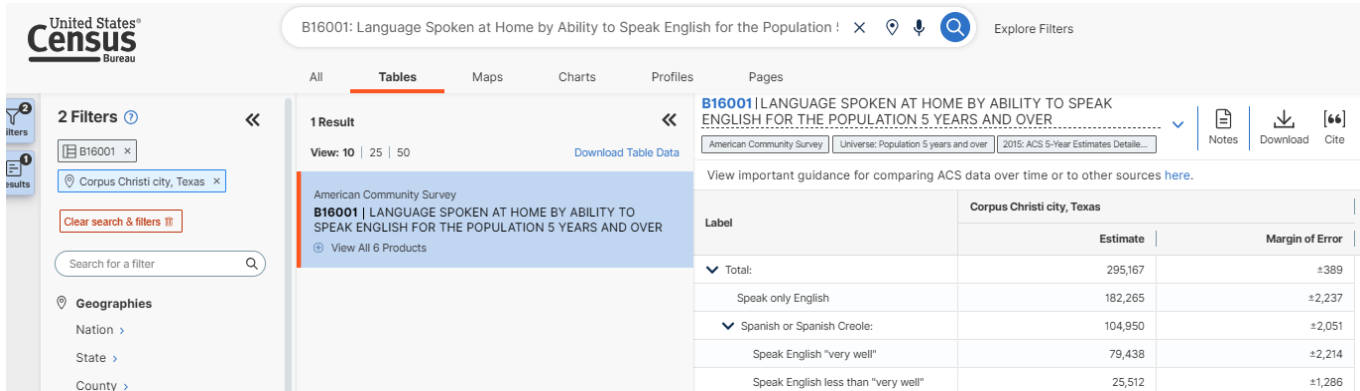
Given that Spanish speaking LEP residents represent a significant portion of the City's population, the City of Corpus Christi prioritizes Spanish translation of vital documents and interpretation services. The City of Corpus Christi provides additional language assistance as requested and when reasonable.



The City of Corpus Christi has determined a need to translate vital Title VI documents to Spanish when possible, using the data provided from The American Community Survey.

[P9: HISPANIC OR LATINO, AND NOT ... - Census Bureau Maps](#)

[B16001: Language Spoken at Home by ... - Census Bureau Tables](#)





Training

The City of Corpus Christi will ensure that its staff understand Title VI of the Civil Rights Act of 1964 and how it may apply to their work. The following training options will be offered to select City of Corpus Christi staff. The training options assigned to staff will depend on their relevance to their departments:

Review of the City of Corpus Christis Title VI Plan

- Attendance at any available Title VI trainings provided by the Texas Department of Transportation, U.S. Department of Transportation or its applicable operating administrations, or the U.S. Department of Justice.
- Viewing the video [Title VI at TxDOT](#) produced by TxDOT. This training provides a general Title VI overview as well as TxDOT specific information.
- Viewing the video Understanding and Abiding by Title VI of the Civil Rights Act of 1964 produced by the U.S. Department of Justice
- Training options listed on TxDOT Title VI/Nondiscrimination Program website
- Training options listed on the Federal Transit Administration's Title VI Training Website
- Training programs offered by FHWA's Civil Rights Division

The City of Corpus Christi will maintain records indicating that staff have received sufficient training on a periodic basis. Records of training attendance will be maintained.



Title VI/Nondiscrimination Policy Statement

Attachment 1

The City of Corpus Christi, as a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, color, national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Department programs or activities.

A handwritten signature in blue ink, appearing to read "D. J. Zamora", written over a horizontal line.

Signature of Authorized Official

A handwritten date in blue ink, "8.7.26", written over a horizontal line.

Date

Título VI/Declaración de política de no discriminación

El , City of Corpus Christi, como beneficiario de ayuda financiera federal y en virtud del Título VI de la Ley de Derechos Civiles de 1964 y estatutos relacionados, garantiza que ninguna persona será excluida de participar, se le negarán los beneficios o será objeto de discriminación en ningún programa o actividad del Departamento por motivos de raza, color o nacionalidad.

A handwritten signature in blue ink, appearing to read "D. J. Zamora", written over a horizontal line.

Firma del funcionario autorizado

A handwritten date in blue ink, "8.7.26", written over a horizontal line.

Fecha



The United States Department of Transportation (USDOT)

Standard Title VI/Nondiscrimination Assurances

DOT Order No. 1050.2A

Attachment 2

The City of Corpus Christi (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.P.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.P.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," 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 City of Corpus Christi programs 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 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. 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.

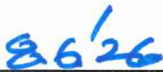
The Recipient gives this assurance in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. DOT under all Department of Transportation 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 Manager _____

Title of Recipient



Signature of Authorized Official



Date



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.

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 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 Corpus Christi 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 the City of Corpus Christi 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 the City of Corpus Christi 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 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 Corpus Christi, its successors and assigns.

The City of Corpus Christi, 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 Corpus Christi 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 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 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.



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, the City of Corpus Christi 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 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 Nondiscrimination covenants, the City of Corpus Christi 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 Corpus Christi 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.



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, THE City of Corpus Christi 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 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 nondiscrimination covenants, the City of Corpus Christi will there upon revert to and vest in and become the absolute property of the City of Corpus Christi 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.



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 Nondiscrimination 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 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.).