

**CITY OF JOSHUA**

# **Title VI/Nondiscrimination Plan**

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**2026-2029**

Prepared in response to TxDOT Civil Rights Division desk review dated June 25, 2026

City of Joshua  
101 South Main Street  
Joshua, Texas 76058  
(817) 558-7447  
[www.cityofjoshuatx.us](http://www.cityofjoshuatx.us)

## Document Control and Approval

| Item                 | Information                                                                                             |
|----------------------|---------------------------------------------------------------------------------------------------------|
| Agency               | City of Joshua, Texas                                                                                   |
| Plan period          | 2026-2029                                                                                               |
| Top official         | Mike Peacock, City Manager                                                                              |
| Title VI Coordinator | Vanessa Quinones, BSW<br>Assistant to the City Manager - Communications                                 |
| Coordinator contact  | 101 S. Main Street, Joshua, TX 76058   (817) 558-7447 ext. 2002  <br>vquinones@cityofjoshuatx.us        |
| Effective date       | [INSERT DATE ADOPTED/APPROVED]                                                                          |
| Review cycle         | At least every three years and whenever material legal, organizational, or<br>demographic changes occur |

### Approval

By signing below, the City Manager approves this plan and directs City departments, employees, contractors, consultants, subrecipients, and agents to comply with it.

\_\_\_\_\_  
Mike Peacock, City Manager

\_\_\_\_\_  
Date

## Submission and Implementation Checklist

This checklist is administrative guidance and is not part of the public plan after final adoption.

- ☐ Confirm the City's 90-day response deadline with TxDOT and request a short virtual compliance meeting if needed.
- ☒ COMPLETED — Vanessa Quinones completed TxDOT's recorded Title VI Subrecipient Technical Assistance Workshop. Retain the certificate with the compliance file.
- ☒ City Attorney review of this plan and complaint procedure completed.
- ☐ Following approval, insert the approval date and obtain Mike Peacock's signatures.
- ☐ Complete and sign TxDOT's current USDOT Standard Title VI/Nondiscrimination Assurances (Rev. 05/26), including all appendices.
- ☐ Create a public Title VI webpage and post this plan, the policy statement, coordinator contact information, complaint procedures, and English and Spanish complaint forms.
- ☐ Post the notice at City Hall and provide it at applicable public meetings and transportation-project outreach events.
- ☐ Add the required Appendix A language to applicable solicitations and contracts and the applicable real-property clauses to instruments covered by Appendices B-E.
- ☐ Create and maintain the complaint log, language-assistance request log, training log, public-outreach log, and annual program review file.
- ☐ Submit TxDOT's online Title VI Compliance Check with the signed plan, assurances, screenshots/links showing public posting, workshop certificate, and supporting records.

### Items that still require confirmation

- Approval/adoption date and whether the City will use administrative approval or a council resolution under local practice.
- The final URL for the City's Title VI webpage.
- The exact 2026 ACS/Census B16001 limited-English-proficiency figures before final publication.

## 1. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Related federal authorities extend additional nondiscrimination protections. The Civil Rights Restoration Act of 1987 applies these requirements institution-wide when any portion of an agency receives federal assistance.

The City of Joshua, as a recipient or subrecipient of federal transportation assistance, will administer its programs, services, and activities without discrimination and will comply with Title VI, 49 C.F.R. Part 21, 23 C.F.R. Part 200, applicable U.S. Department of Transportation requirements, and related authorities.

This plan establishes responsibilities, procedures, and a three-year implementation program for 2026-2029. It applies to every City department and to contractors, consultants, subrecipients, and others acting on the City's behalf.

## 2. Prohibited Discrimination

Every City employee shares responsibility for preventing discrimination. Prohibited discrimination includes intentional unequal treatment and practices that, although neutral in form, have an unjustified discriminatory effect. Prohibited actions may include:

- Denying services, financial assistance, or other benefits;
- Providing benefits in a different quantity, quality, or manner;
- Segregating or separating persons in a program;
- Using different standards for participation;
- Restricting participation in planning or advisory bodies;
- Using administrative or contractual methods that impair nondiscrimination;
- Retaliating against a person who complains or participates in an investigation; and
- Discriminating in activities involving highways, infrastructure, facilities, property, permits, maintenance, or federally assisted projects.

## 3. Authorities

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.
- 49 C.F.R. Part 21.
- 23 C.F.R. Part 200.
- 28 C.F.R. § 50.3.
- Civil Rights Restoration Act of 1987.
- U.S. DOT Order 1050.2A and related guidance.
- Texas Administrative Code § 9.4, as applicable.

## 4. Policy Statement

It is the policy of the City of Joshua that 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 in any City program, service, or activity, as provided by Title VI of the Civil Rights Act of 1964 and related authorities.

This policy applies to all City operations, including contractors and anyone acting on the City's behalf, and to any department, organization, or subrecipient to which the City extends federal financial assistance. Federal financial assistance includes grants, training, equipment, surplus property, and other assistance.

The signed public policy statement is included as Attachment A.

## 5. Standard USDOT Assurances

As a condition of receiving federal transportation assistance, the City will execute and comply with the current USDOT Standard Title VI/Nondiscrimination Assurances under DOT Order 1050.2A. The assurances require prescribed language in applicable solicitations, contracts, subcontracts, real-property instruments, leases, licenses, permits, and similar documents.

The signed official TxDOT assurance form, including Appendices A-E, shall be maintained with this plan as Attachment B. Staff must use the clauses exactly as directed by the assurances and should not paraphrase them.

## 6. Organization and Staffing

The City Manager is ultimately responsible for Title VI compliance. The City Manager designates Vanessa Quinones, BSW, Assistant to the City Manager - Communications, as Title VI Coordinator. The Coordinator has direct and unimpeded access to the City Manager for nondiscrimination matters.

### Coordinator responsibilities

- Maintain and update this plan and supporting records.
- Coordinate Title VI training.
- Receive complaints, provide acknowledgment, and promptly refer complaints to TxDOT.
- Maintain a confidential complaint log.
- Coordinate demographic data collection and analysis.
- Review City program areas for nondiscrimination.
- Coordinate language assistance and document requests.
- Publish Title VI information internally and externally.
- Review applicable bids, contracts, and real-property instruments for required clauses.
- Document annual implementation activities and recommend corrective action.

**Organizational relationship**

| <b>City Manager</b> | <b>Title VI Coordinator</b>                                                | <b>Departmental support</b>                                                                                                                                                                                         |
|---------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mike Peacock        | Vanessa Quinones, BSW<br>Assistant to the City Manager -<br>Communications | Public Works Director; Development<br>Services Director; Finance/procurement;<br>City Secretary; Human Resources;<br>communications/web staff; project<br>managers; City Engineer and consultants,<br>as applicable |

## 7. Program Areas and Review Procedures

| Program area                                   | City activity                                                                                                            | Title VI review procedure                                                                                                                                               |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transportation planning and capital projects   | Project selection, design, construction, drainage, sidewalks, streets, and coordination with TxDOT or regional partners. | Use demographic information; evaluate access, displacement, travel, and community effects; document outreach and language assistance; review benefits and burdens.      |
| Street, drainage, and right-of-way maintenance | Maintenance response, repair, signage, drainage, mowing, weather response, and service prioritization.                   | Review service records by location; use consistent criteria; investigate patterns suggesting unequal service; document corrective action.                               |
| Right-of-way, easements, and property          | Permits, acquisition, easements, relocation coordination, leases, licenses, and use of federally assisted property.      | Provide notice of rights; review impacts; use applicable assurance clauses; retain acquisition and contact records.                                                     |
| Contracting and procurement                    | Bids, RFPs, quotes, professional services, construction contracts, and subcontracts.                                     | Maintain open competition; insert required Title VI clauses; document outreach; monitor contractor compliance and complaints.                                           |
| Permitting and regulatory services             | Development, construction, access, and right-of-way permits and enforcement connected to City programs.                  | Apply written standards consistently; provide language assistance; review complaints and recurring outcomes.                                                            |
| Public participation and communications        | Public hearings, meetings, notices, website information, surveys, and project outreach.                                  | Identify affected groups; use accessible locations and formats; provide translation/interpretation when warranted; retain notices, attendance, comments, and responses. |
| Parks and public facilities                    | Access to parks, facilities, programs, and federally assisted improvements.                                              | Review accessibility, location, hours, fees, maintenance, and participation for unequal effects; document outreach and decisions.                                       |

## 8. Data Collection and Analysis

The City will use reasonably available data to identify affected populations, evaluate program access, plan outreach, and determine language-assistance needs. Collection will be voluntary where individual demographic questionnaires are used, and personally identifying information will be protected consistent with law and City policy.

| Source or record                                                | Use                                                                                                                                                            |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| U.S. Census Decennial Table P9 and ACS tables, including B16001 | Race, ethnicity, national origin proxies, languages spoken, and English proficiency; reviewed citywide and at tract/block-group level when a project warrants. |
| Project maps and service records                                | Compare project benefits, burdens, maintenance, complaints, permits, and service delivery by location.                                                         |
| Public participation records                                    | Notices, distribution methods, attendance, voluntary demographic responses, comments, language requests, and responses.                                        |
| Procurement records                                             | Bidder lists, DBE/HUB/SBE information when available, awards, required clauses, and contractor compliance.                                                     |
| Complaint and language-assistance logs                          | Identify recurring barriers or allegations and document response.                                                                                              |
| School district, NCTCOG, TxDOT, and other credible sources      | Supplement community and transportation-planning information.                                                                                                  |

### Baseline community information

The U.S. Census Bureau estimated Joshua's July 1, 2025 population at 9,352. Census QuickFacts reports that 18.7% of residents are Hispanic or Latino and that 16.7% of persons age five and older speak a language other than English at home (2020-2024). Before final adoption, the Coordinator will retain the current ACS B16001 table identifying persons who speak English less than "very well" and will document whether any language group meets the applicable safe-harbor threshold for vital-document translation.

## 9. Complaint Procedures

Any person or organization believing that the City of Joshua or a City contractor discriminated on the basis of race, color, or national origin in a program, service, or activity may file a Title VI complaint. Retaliation for filing or participating in a complaint is prohibited.

## How to file

A complaint should be filed within 180 days after the alleged discrimination unless the processing agency extends the filing period. Complaints should be written, signed, and may be submitted by mail, in person, or email to:

**Vanessa Quinones, BSW, Title VI Coordinator**  
**Assistant to the City Manager - Communications**  
**City of Joshua**  
**101 S. Main Street**  
**Joshua, Texas 76058**  
**(817) 558-7447 ext. 2002**  
**vquinones@cityofjoshuatx.us**

A person who needs assistance may call the Coordinator. The Coordinator will document the allegations and send the written complaint to the complainant for correction and signature. Alternative formats and language assistance will be provided upon request.

## Required information

- Complainant's name and contact information.
- Basis of the complaint.
- A description of what happened, the responsible persons or entities, and why the complainant believes protected status was a factor.
- Date and location of the alleged action and whether it is continuing.
- Names and contact information of witnesses, if available.
- The remedy requested.
- Complainant's signature and date.

## City processing

1. Date-stamp the complaint and enter it on the confidential complaint log.
2. Acknowledge receipt and provide status information within 10 business days.
3. Immediately notify the City Manager and City Attorney.
4. Promptly forward the complaint and available materials to the TxDOT Civil Rights Division.
5. Preserve records and cooperate with TxDOT and FHWA.
6. Do not conduct an independent merits investigation unless directed or authorized by the responsible agency and City Attorney.
7. Document the final disposition provided by TxDOT/FHWA.

Complaints may also be submitted directly to TxDOT Civil Rights Division, Attn: Title VI Program Manager, 125 E. 11th Street, Austin, Texas 78701, or to Federal Highway Administration, U.S. DOT Office of Civil Rights, HCR-20, Room E81-320, 1200 New Jersey Avenue SE, Washington, DC 20590; [CivilRights.FHWA@dot.gov](mailto:CivilRights.FHWA@dot.gov).

## 10. Notice of Rights and Program Visibility

The City will make Title VI information available at City Hall, on the City website, and at applicable transportation-project meetings. Public materials will identify the Coordinator and explain how to request language assistance or file a complaint.

- Title VI/Nondiscrimination Plan.
- Signed policy statement in English and Spanish.
- Coordinator name and contact information.
- Complaint procedures and forms in English and Spanish.
- Signed assurances or a notice that the assurances are available for inspection.
- Instructions for requesting interpretation, translation, disability accommodation, or alternative formats.

## 11. Public Participation

The City's goal is continuous, effective, and transparent access to planning and project decisions. Outreach will be scaled to the nature and location of the activity and will consider populations that may face barriers because of language, meeting time, transportation, disability, technology, or other circumstances.

### Outreach methods

- City website and project webpages.
- Posted and mailed notices when appropriate.
- Email and electronic subscription notices.
- Social media and other established City communication channels.
- Public meetings, hearings, workshops, and open houses.
- Direct outreach to affected property owners, neighborhoods, schools, community organizations, businesses, and service providers.
- Virtual or hybrid participation when appropriate.
- Translation, interpretation, alternative formats, and accessible meeting locations when warranted.

### Documentation

For applicable projects, the responsible department will retain the outreach plan, demographic sources reviewed, notices and distribution list, meeting location and accessibility information, language-assistance decisions, attendance or sign-in records, comments received, responses, and follow-up actions. The Coordinator will review public-involvement records annually for gaps or recurring barriers.

## 12. Language Assistance and Limited English Proficiency

A person with limited English proficiency (LEP) does not speak English as a primary language and has limited ability to read, write, speak, or understand English. The City will take reasonable steps to provide meaningful access without charging the individual for necessary language assistance.

## Four-factor analysis

8. Number or proportion of LEP persons eligible to be served or likely to be encountered.
9. Frequency of contact with LEP persons.
10. Nature and importance of the program, activity, information, or service.
11. Resources available and the cost of assistance.

## City procedures

- Review ACS B16001 and project-area demographics before major outreach.
- Ask individuals to identify their preferred language without requesting immigration information.
- Use qualified interpreters or reliable contracted/telephone services for important communications; do not require a child or family member to interpret.
- Translate vital documents when the four-factor analysis and safe-harbor guidance indicate translation is warranted.
- At minimum, maintain Spanish versions of the public policy notice and complaint form because Spanish is the predominant non-English language in Texas and a significant portion of Joshua residents identify as Hispanic or Latino.
- Document requests, assistance provided, provider, cost, and outcome.
- Use plain language and accessible formats.
- Review the language-assistance approach annually and after significant demographic changes.

## 13. Training, Monitoring, and Three-Year Goals

### Training

The Coordinator and relevant staff will complete TxDOT training and receive periodic instruction on this plan, complaint referral, public participation, language assistance, procurement clauses, data collection, and recordkeeping. Training records will include the date, subject, provider, attendees, and certificate when issued.

| Timeframe                       | Required action                                                                                                                        | Evidence                                                                                          |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Within 90-day corrective period | Retain completed workshop certificate; approve plan and policy; sign assurances; establish webpage and forms; submit compliance check. | Workshop certificate, signed documents, webpage screenshots/links, TxDOT submission confirmation. |
| Year 1                          | Train key staff; implement logs; add clauses to procurement checklists; obtain B16001 data; review active transportation projects.     | Training log, updated templates, demographic file, program review.                                |

| Timeframe | Required action                                                                                                              | Evidence                                                      |
|-----------|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Year 2    | Audit public participation, language requests, maintenance/service records, and a sample of contracts; correct deficiencies. | Annual review memorandum and corrective-action record.        |
| Year 3    | Repeat program-area review; update demographics; revise and reapprove the plan for the next three-year period.               | Updated plan, signatures, publication record, staff training. |

### Annual self-review

By September 30 each year, the Coordinator will review complaints, language-assistance encounters, public-participation records, program-area reviews, training, procurement clauses, demographic changes, and corrective actions. Findings will be reported to the City Manager and retained with the Title VI file.

## Attachment A — Public Policy Statement

The City of Joshua is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related nondiscrimination authorities. 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 City of Joshua program, service, or activity.

This commitment applies throughout the City's operations and to contractors, consultants, subrecipients, and others acting on the City's behalf. Any person who believes they have experienced discrimination may contact the City's Title VI Coordinator or file a complaint directly with the Texas Department of Transportation or the appropriate federal agency. The City prohibits intimidation or retaliation against any person for filing a complaint or participating in a Title VI matter.

To request language assistance, an alternative format, or information about filing a complaint, contact Vanessa Quinones, BSW, Title VI Coordinator and Assistant to the City Manager - Communications, at (817) 558-7447 ext. 2002, [vquinones@cityofjoshuatx.us](mailto:vquinones@cityofjoshuatx.us), or 101 S. Main Street, Joshua, Texas 76058.

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**Mike Peacock, City Manager**

Date

### Spanish public notice

La Ciudad de Joshua cumple con el Título VI de la Ley de Derechos Civiles de 1964. Ninguna persona será excluida de la participación, se le negarán beneficios ni será objeto de discriminación por motivos de raza, color u origen nacional en ningún programa, servicio o actividad de la Ciudad. Para solicitar asistencia lingüística, un formato alternativo o información sobre cómo presentar una queja, comuníquese con Vanessa Quinones, BSW, Coordinadora del Título VI y Asistente del Administrador de la Ciudad - Comunicaciones, al (817) 558-7447 ext. 2002, [vquinones@cityofjoshuatx.us](mailto:vquinones@cityofjoshuatx.us), o 101 S. Main Street, Joshua, Texas 76058. La Ciudad prohíbe las represalias contra cualquier persona que presente una queja o participe en un asunto relacionado con el Título VI.

## Attachment B — USDOT Assurances

Insert the fully completed and signed TxDOT “USDOT Standard Title VI/Nondiscrimination Assurances, DOT Order No. 1050.2A,” current revision May 2026, including Appendices A through E, immediately behind this page.

Completion notes:

- Recipient: City of Joshua.
- Federal assistance/program blank: identify the applicable TxDOT/FHWA program or use wording confirmed by TxDOT.
- Authorized official: Mike Peacock, City Manager.
- Do not remove Appendices A-E.
- Use Appendix A in applicable solicitations and contracts and Appendices B-E in applicable real-property instruments exactly as directed.

## Attachment C — Title VI Complaint Form

Submit to: Vanessa Quinones, BSW, Title VI Coordinator and Assistant to the City Manager - Communications, City of Joshua, 101 S. Main Street, Joshua, TX 76058 | (817) 558-7447 ext. 2002 | [vquinones@cityofjoshuatx.us](mailto:vquinones@cityofjoshuatx.us)

**Last name:** \_\_\_\_\_

**First name:** \_\_\_\_\_

**Mailing address:**

\_\_\_\_\_

**City / State / ZIP:**

\_\_\_\_\_

**Main phone:** \_\_\_\_\_

**Alternate phone:**

\_\_\_\_\_

**Email:** \_\_\_\_\_

Basis of complaint (check all that apply): ☐ Race ☐ Color ☐ National origin ☐ Retaliation ☐ Other related protected class: \_\_\_\_\_

**Date(s) and place of alleged discriminatory action:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Describe what happened and why you believe your protected status was a factor. Explain how others were treated differently:**

\_\_\_\_\_

\_\_\_\_\_

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**If you believe retaliation occurred, describe the circumstances:**

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**Names of persons or organizations responsible:**

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**Witnesses and contact information:**

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**Other agencies where this matter was filed and filing dates:**

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**City representative previously contacted, position, and date:**

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**Remedy or action requested:**

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**Additional information or documents attached:**

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I certify that the information provided is true and correct to the best of my knowledge. An unsigned complaint cannot be accepted as a formal written complaint.

|                               |             |
|-------------------------------|-------------|
| <hr/>                         | <hr/>       |
| <b>Signature, Complainant</b> | <b>Date</b> |

## Attachment D — Administrative Logs

### Complaint log

| Case no. | Received | Basis / issue | Referred to<br>TxDOT | Disposition / date |
|----------|----------|---------------|----------------------|--------------------|
|          |          |               |                      |                    |
|          |          |               |                      |                    |
|          |          |               |                      |                    |

### Language-assistance log

| Date | Program /<br>contact | Language / assistance<br>requested | Assistance provided /<br>provider | Outcome |
|------|----------------------|------------------------------------|-----------------------------------|---------|
|      |                      |                                    |                                   |         |
|      |                      |                                    |                                   |         |
|      |                      |                                    |                                   |         |

### Training log

| Date | Training | Provider | Attendees | Certificate /<br>record |
|------|----------|----------|-----------|-------------------------|
|      |          |          |           |                         |
|      |          |          |           |                         |
|      |          |          |           |                         |

## Attachment E — Public Participation Record

**Project or activity:**

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**Department / project manager:**

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**Location / affected area:**

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**Decision or action under consideration:**

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**Demographic sources and geographic level reviewed:**

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**Groups or neighborhoods identified for outreach:**

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**Notice methods and distribution dates:**

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**Meeting date, time, location, and accessibility:**

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**Virtual participation offered:**

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**Languages anticipated or requested:**

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**Translation or interpretation provided:**

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**Attendance and voluntary demographic information:**


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**Comments received and City responses:**


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**Follow-up and corrective actions:**


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**Records location:**


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**Attachment F — Sources and Required Supporting Records**

- TxDOT Subrecipient Title VI Plan Template, current version accessed August 2026.
- USDOT Standard Title VI/Nondiscrimination Assurances, DOT Order 1050.2A, TxDOT revision 05/26.
- TxDOT Title VI Subrecipient Compliance Assessment Tool Technical Assistance Guide.
- TxDOT Title VI Complaint Form template, revision 04/20.
- TxDOT Civil Rights Division Guide for Obtaining Demographic Data, dated August 13, 2025.
- U.S. Census Bureau QuickFacts, Joshua city, Texas, and ACS Table B16001.

Supporting records maintained outside this plan: signed assurances; workshop certificate; City Attorney review; webpage screenshots and URLs; current demographic tables; procurement clauses; annual self-reviews; complaint, training, public-participation, and language-assistance logs.