

TITLE VI
IMPLEMENTATION PLAN

Bluegrass Area Development District

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I. GLOSSARY OF COMMON TERMS

“Beneficiary or recipient” means the individual or organization for which federal funds are intended.

“Implementation plan” means the Title VI implementation plan developed and maintained by Bluegrass Area Development District (BGADD) to ensure compliance with 42 U. S. C. § 2000d et. seq. and KRS 344.015.

“Title VI Compliance Officer” means the person designated by the Responsible Official to coordinate all Title VI activities of the BGADD.

“Responsible Official” means the person identified in Section IV, *infra*.

II. OVERVIEW

The BGADD Board of Directors is the governing body of Bluegrass Area Development District. As a recipient of federal funds through grant program(s), the BGADD is subject to Title VI of the Civil Rights Act of 1964.

The BGADD has chosen to adopt the Implementation plan created by the Department for Local Government (DLG) dated June 16, 2009.

III. SCOPE OF TITLE VI APPLICABILITY TO PROGRAMS AND ACTIVITIES

BGADD affords all individuals the opportunity to benefit from programs administered by the BGADD.

A. Title VI of the Civil Rights Act of 1964 (42 U. S. C. § 2000d) provides:

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 subjected to discrimination under any program or activity receiving federal financial assistance.

B. 34 C. F. R. § 100.1, 100.2, and 100.3 implement the provisions of the federal statute.

C. KRS 344.015 § 1(2) states:

Each state agency shall:

- (a) Develop a Title VI implementation plan by January 1, 1995. If required by Title VI or regulations promulgated thereunder, the implementation plan shall:
 - 1. Be developed with the participation of protected beneficiaries; and
 - 2. Include Title VI implementation plans of any sub-recipients of federal funds through the state agency;
- (b) Submit a copy of the implementation plan to the Auditor of Public Accounts and the Human Rights Commission; and
- (c) Submit annual Title VI compliance reports and any implementation plan updates to the Auditor of Public Accounts and the Human Rights Commission by July 1, 1995, and each July 1 thereafter.

The federal statute codified as 42 U. S. C. § 2000d and state statute KRS 344.015 provide the authority for the development of this plan and describe the extent of the authority.

Title VI applies to discriminatory acts based on race, color, or national origin and specifically prohibits the exclusion of individuals or groups from participation in, or enjoying the benefits of, federal programs. Title VI does not provide relief for discrimination based on age, sex, disability, geographic location, or wealth.

IV. RESPONSIBLE OFFICIAL

David Duttlinger, Executive Director, has overall responsibility for implementation, compliance and reporting with respect to Title VI. Inquiries related to these activities should be directed to:

David Duttlinger, Executive Director
699 Perimeter Drive
Lexington, KY 40517
(859) 269-8021
dduttlinger@bgadd.org

V. STATEMENT OF ASSURANCES

The BGADD, its Staff, any sub-recipients of federal funds under grants administered by the BGADD and all other parties involved with such grants are in compliance with all provisions of Title VI of the Civil Rights Act of 1964 (42 U. S. C. § 2000d).

- A. Each sub-recipient of federal funds under grants administered by the BGADD shall have agreed in writing to adopt BGADD's Title VI plan, or
- B. If the sub recipient's Title VI plan differs from the BGADD's plan, the sub-recipient's Title VI plan shall be available for review from the Responsible Official.

VI. PROGRAMS OR ACTIVITIES SUBJECT TO TITLE VI

A. U.S. Housing and Urban Development's Community Development Block Grant (CDBG), U.S Federal Highway Administration funding, U.S. Department of Labor's Workforce Innovation and Opportunity Act (WIOA), funding and U.S. Health and Human Services, Administration for Community Living programs. Funds are designated for the following program areas:

- Housing
- Community Projects
- Public Services
- Public Facilities
- Economic Development
- Community Emergency Relief Fund
- U.S. Department of Labor WIOA
- Transportation
- Administration for Community Living

The U.S. Department of Housing and Urban Development (HUD) funded Community Development Block Grant (CDBG) program for DLG, Federal Highway Administration, Department of Labor, WIOA, and Health and Human Services, Administration for Community Living to provide assistance to communities for use in revitalizing neighborhoods, expanding affordable housing and economic opportunities, providing infrastructure and/or improving community facilities, providing workforce development to the Bluegrass region, and the provision of services for our Senior Citizens.

B. The Land and Water Conservation Fund (LWCF) provides federal grant funds to protect important natural areas, to acquire land for outdoor recreation and to development or renovate public outdoor recreation facilities such as campgrounds, picnic areas, sports & playfields, swimming facilities, boating facilities, fishing facilities, trail, natural areas and passive parks.

Potential Beneficiaries: Cities and counties, state and federal agencies are eligible to apply for funding. The maximum grant amount is \$75,000. The minimum amount is \$5,000. It is a 50% matching reimbursement program.

C. The Recreational Trails Program provides grant funds to develop and renovate recreation trails for both motorized and non-motorized use. It does not fund equipment such as mowers and gators.

Potential Beneficiaries: Eligible applicants are city and county governments, state and federal agencies, and non-profit organizations.

D. The ARC is a federal-state economic development program. To assist in the economic development of Appalachia through a diversity of projects in the areas of public infrastructure

(water, sewer, solid waste, housing, and telecommunications), human resource development (education/workforce development, affordable/accessible healthcare, and leadership development) and business/entrepreneurial development.

Potential Beneficiaries Local governments, special districts, and non-profit entities that include Kentucky's 51 most eastern and south-central Counties are eligible to apply for the grant dollars. Thirty-two "distressed" counties also have access to a separate restricted allocation of funds.

E. The National Forest Receipts program provides "pass-through" funds to counties. The State Local Finance Officer receives notice of wire transfer from the US Department of Agriculture Forest Service for funds to be distributed annually to various counties.

Potential Beneficiaries: Counties.

F. The Flood Control Receipts program provides "pass-through" funds to counties. The State Local Finance Officer receives a check annually from the US Army Corps of Engineers. The check is deposited with the KY State Treasurer, authorization for payment to Counties is processed and checks are then prepared to send this money to the Counties in accordance with the statement from the federal government which was enclosed with the check.

Potential Beneficiaries: Counties.

G. The Kentucky Infrastructure Authority administers two federal grant programs from the Environmental Protection Agency:

1. Capitalization Grants for Clean Water State Revolving Funds provides assistance for: (1) construction of publicly owned wastewater treatment works; and (2) nonpoint source management activities. Funds are loaned to local government entities.
2. Capitalization Grants for Drinking Water State Revolving Funds provides assistance for infrastructure improvement projects that are needed to achieve or maintain compliance with Safe Drinking Water Act requirements, protect public health, and assist systems with economic need. Funds are loaned to local government entities.

VII. COMPLAINT PROCEDURES

A. COMPLAINT PROCEDURES

1. How a complaint shall be filed

Complaints in relation to alleged discrimination under Title VI of the Civil Rights Act of 1964 may be filed using the forms attached in the Appendix. If an individual refuses to submit a written complaint, the compliance officer shall record the information orally from the individual and shall provide a copy to the individual with a request that the information be confirmed by the complainant.

A complaint may be filed by anyone who believes that the BGADD has discriminated against a participant, beneficiary, or a class of beneficiaries on the basis of race, color, or national origin.

Complaints must be filed within one hundred eighty (180) days of the activity which prompts the filing of the complaint.

2. Where to file a complaint

Complaints in relation to alleged discrimination under Title VI of the Civil Rights Act of 1964 may be filed with the BGADD's Title VI compliance officer, David Duttlinger.

3. Time frame within which the complaint shall be processed by the agency; and upon receipt of a written complaint, the compliance officer shall review the complaint and shall file, within seven (7) days, a concise statement with the Responsible Official regarding the nature of the complaint and the steps to be taken to investigate or resolve the complaint

4. Withdrawal of a complaint;

A complainant may withdraw a complaint at any time before final action by filing with the compliance officer a written statement of his or her desire to withdraw the complaint.

B. INVESTIGATIONS, REPORT OF FINDINGS, HEARINGS AND APPEALS.

1. Investigations

Upon receipt of the complaint by an individual or at the time the compliance officer becomes independently aware of actions which may constitute a violation of Title VI, the compliance officer shall take necessary action within thirty (30) days to investigate and recommend specific actions to resolve the complaint. A report shall be filed by the compliance officer with the Responsible Official within that period.

2. Report of Findings

The complainant shall be notified in writing of the results of the investigation and any actions taken.

The BGADD shall attempt to maintain the confidentiality of the complaint and the name of the complainant.

The complainant shall be notified in writing, within 30 days of the resolution of a complaint, by the Responsible Official or the Title VI compliance officer of the resolution of a complaint. A statement of corrective action shall include specific statements of actions to be taken or prohibited actions and shall include a timetable for implementation.

3. Hearings and Appeals

A complainant may file a written appeal from the Responsible Official's resolution of the complaint within 30 days of the receipt of the written notice of resolution. Appeals shall be directed to the BGADD Executive Director and shall be set forth in writing. The complainant shall be notified of the final resolution of the complaint within 60 days of the Executive Director's receipt of the appeal.

A complainant filing a written appeal may request an in-person hearing before the BGADD Executive Director. Such request shall be set forth in writing and shall be submitted contemporaneously with the written appeal. The complainant shall be notified of the date, time and place of the hearing within 15 days of the BGADD's receipt of the request.

VIII. COMPLIANCE

- A. The BGADD shall make every effort to regulate, monitor, review, and report on the federal programs to assure compliance.
- B. Upon a finding by the BGADD of noncompliance, BGADD shall take the following actions with regard to:

1. Processing

The compliance officer shall immediately notify the Responsible Official in writing of the violations held to constitute noncompliance with Title VI and of the steps necessary to correct these violations.

2. Reporting

The compliance officer shall notify the sub-recipient or employee found to be in noncompliance, in writing within 30 days of the compliance officer's report of noncompliance, of the violations and corrective measures necessary to remedy the violations.

3. Resolution

The BGADD shall attempt to secure voluntary compliance with Title VI. In the event that efforts to secure voluntary compliance are not secured within a reasonable period of time, the compliance officer will notify the Responsible Official, in writing, of the recommended corrective action.

4. Enforcement of corrective actions

The Responsible Official shall implement corrective actions within thirty (30) days of receipt and acceptance of the notification of recommended corrective action.

Employees or grant sub-recipients who refuse to voluntarily comply with Title VI or to take corrective actions required by the BGADD shall face disciplinary action, or in the case of grant sub-recipients, may face termination or suspension of the contractual relationship with BGADD.

5. Monitoring of programs

The BGADD shall undertake to periodically monitor all programs funded through federal assistance for those sub-recipients who have been found by the BGADD to be in non-compliance with Title VI.

IX. TRAINING

The Title VI implementation plan will be disseminated to all BGADD employees along with complaint procedures. Sub-recipients of federal grants will be notified of the Title VI implementation plan and complaint procedures at the time of any grant award.

The BGADD may periodically hold Title VI training seminars for its employees, particularly for those individuals responsible for monitoring sub-recipients for Title VI compliance. All new employees shall receive a copy of BGADD's Title VI plan as part of the orientation process.

X. GOALS AND EVALUATION PROCEDURES

The BGADD endeavors to reevaluate its Title VI goals on an annual basis, as part of the process of reviewing the agency's Title VI plan. The plan shall, each year, set forth BGADD's current goals and the process for evaluating and revising those goals and the agency's progress towards those goals.

A. Goals

1. Report compliance activities in a timely manner.
2. Respond to and investigate all complaints within the timeframe and in accordance with the procedures outlined in Section VII.
3. Obtain information from employees to determine if the plan is adequate to address their needs and the requirements of Title VI.

B. Evaluation of Goals

1. The Advisory Committee shall, at each meeting, review the agency's goals and its progress towards these goals, and evaluate the effectiveness of the plan's provisions as they relate to these goals.

2. The Advisory Committee shall, at each meeting, establish a timeline for achievement of goals, and implement a process for monitoring the progress towards these goals.
3. The Advisory Committee shall, at each meeting, promulgate a written report of the agency's progress towards the identified goals.
4. The Advisory Committee shall, at each meeting, discuss and evaluate whether any corrective procedures are necessary to bring the BGADD closer to its goals

XI. PUBLIC NOTIFICATION

Three groups of people will receive notification of BGADD's Title VI plan, complaint forms, nondiscrimination policy, and programs and services: 1) BGADD employees who will receive copies of the implementation plan and the complaint procedures; 2) federal grants applicants and sub-recipients of federal grants who will be notified of Title VI requirements at the time of application and at the time of any grant award; and 3) members of the general public who request information via phone, fax, or email.

The BGADD Title VI Plan and LEP are available for review at the county office. Title VI application forms and checklists for sub-recipients are also available at the BGADD office.

XII. RECORDKEEPING AND REPORTING

A. Complaints

1. The compliance officer will maintain a log of all complaints filed with the BGADD.
2. Grant personnel will certify annually that all sub-recipients have been notified of the Title VI implementation plan and complaint procedures.
3. The compliance officer will maintain copies of complaint forms and will ensure that they are available for use.

B. Reporting

1. Changes in the Title VI implementation plan will be provided to employees and sub-recipients as changes are made.
2. Changes in the Title VI implementation plan will be forwarded to the State Auditor as changes are made.
3. Grant personnel will maintain records of all sub-recipients in order that the BGADD can determine if eligible parties are participating in the grants.

- C. The changes made in sections VIII and IX of this plan are incorporated herein as part of BGADD's recordkeeping and reporting procedures.

XIII. MINORITY REPRESENTATION

A. Minority representation on Boards/Committees

BOARD/COMMITTEE	MEMBERS	MINORITY REPS	PERCENTAGE
BGADD			
White Females	77		
White Males	148		
Black Females	3		
White Females	6		
*Elected Positions			

B. Ensuring minority participation:

The BGADD continues to attempt to identify and employ qualified minority applicants. Where minority representation in particular areas of the agency is low, the BGADD endeavors to fill vacant positions with qualified minorities. Whenever a planning or advisory body, such as a board or committee is an integral part of BGADD's programs, the BGADD shall take such steps as are necessary to ensure that minorities are notified of the existence of such bodies and are provided equal opportunity to participate as members. Where members of a board or committee are appointed by the BGADD and where minorities comprise at least 5% of the affected area or the surrounding community, the facility or agency must appoint a minority representative to serve on the board or committee.

The BGADD has also created a Title VI advisory committee to review and make recommendations regarding this implementation plan and to identify areas where improvement is needed. The advisory committee is currently composed of three (3) people. The advisory committee shall meet at least once each year.

B. The summary of race and national origins for BGADD employees includes the following employees:

RACE/NATIONAL ORIGIN	NUMBER	Percentage
White Females	50	69.44
White Males	18	25.00
Black Females	1	1.39
Black Males	2	2.78

Hispanic Females		
Hispanic Males	1	1.39
American Indian Females		
American Indian Males		
Other Females		
Other Males		
Total	72	100.00

**Bluegrass Area Development District
699 Perimeter Drive
Lexington, KY 40517
Phone: (859) 269-8021
Fax: (859) 269-7917**

**Complaint Under Title VI
The Civil Rights Act of 1964**

To Title VI Coordinator:

I, _____, hereby file an official complaint against

_____ located at

Name of Persons or Agency

Date of alleged discrimination: _____.

Complainant's address: _____

Complainant's telephone number: _____.

Basis of complaint (use back of sheet if necessary):

Signed: _____

Date: _____

**Bluegrass Area Development District
699 Perimeter Drive
Lexington, KY 40517
Phone: (859) 269-8021
Fax: (859) 269-7917**

Report of Investigation

I, _____, representing the BGADD, have investigated the complaint filed on _____, 20__ by _____ alleging that discrimination occurred which was in violation of the provisions of Title VI of the Federal Civil Rights Act.

The results of the investigation were as follows:

- _____ A. The agency or person was found to be in violation of Title VI.
- _____ B. The agency or person was not found to be in violation of Title VI.
- _____ C. The complainant withdrew the complaint.

A copy of the investigative report is attached.

Withdrawal of Complaint (if applicable) _____

If the agency or person was found to be in violation of Title VI, a brief description of the remedial action taken to assure future compliance follows:

Signed: _____

Date: _____

**Bluegrass Area Development District
Language Access Plan (LAP)
for persons with Limited English Proficiency (LEP)
October 2017**

The Bluegrass Area Development District, (BGADD), has established this policy as means to take reasonable steps in ensuring meaningful access to agency services, programs and activities for persons who have limited English proficiency. This plan applies to the federally-funded programs provided through BGADD.

Overview

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons). The BGADD is a recipient of federal funds through the U.S. Department of Housing and Urban Development (HUD), the Federal Highway Administration (FHWA), the Department of Labor, (DOL), and Health and Human Services (HHS) for a portion of its programs and, thus, is obligated to reduce language barriers that can preclude meaningful access by LEP persons to DLG programs.

Definitions

For the purposes of this plan:

- a. *Grantee* means the BGADD.
- b. *Recipient* means the BGADD. This means any entity that receives any federal HUD assistance, directly from BGADD or from another Recipient. This includes, but is not limited to, any unit of local government, public housing authority, community housing development organization, public or private nonprofit agency, developer, private agency or institution, mortgagor, limited dividend sponsor, builder, property manager, resident management corporation, resident counsel or cooperative association. Recipient also includes any successor, assignee or transferees of any such entity, but does not include any ultimate beneficiary under the respective federal grant program.
- c. *LEP* means Limited English Proficiency. Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit or encounter.
- d. *LAP* means Language Access Plan.

Four-Factor Analysis

There are four (4) flexible, fact-dependent factors to be considered in developing language materials and a Limited English Proficiency plan. The following four-factor analysis will serve as the guide for determining which language assistance measures will be undertaken to guarantee access to BGADD's federally funded programs by LEP persons. Additionally, all future recipients of federal assistance are required to use the same four-factor analysis prior to the release of funds.

1. The number or portion of LEP persons eligible to be served or likely encountered through its federally funded programs.
 - a. For determining the LEP population, BGADD utilized the U.S. Census Bureau Language Use data (ACS-DP02) for Language Spoken at Home and English-Speaking Ability by State (See Appendix A).
2. The frequency with which LEP individuals come in contact with the designated federal programs.
 - a. BGADD does not provide direct assistance to individuals. All BGADD funds are awarded to units of local government, certified contractors or nonprofit agencies. As a result, LEP persons rarely come into contact with the respective federal grant program at this level. However, during periods of public comment, some citizen participation may be directed to the BGADD.
3. The nature and importance of the program, activity or service provided by the federal programs.
 - a. BGADD does not provide direct assistance to individuals. All BGADD funds are awarded to units of local government, certified contractors or nonprofit agencies. As a result, LEP persons rarely come into contact with the respective federal grant program at the state level. However, during periods of public comment, some citizen participation may be directed to the BGADD.
4. The resources available to the recipient and the cost. There are two types of assistance service – oral (interpretation) and written (translation).
 - a. Given the resources currently available to BGADD, the LAP measures appear reasonable.

Types of Language Assistance to be Provided by BGADD

As stated previously, although LEP persons rarely come into contact with BGADD programs at the regional level, some citizen participation matters are directed to the BGADD, particularly during periods of public comment. Therefore, BGADD has determined it will make available, upon request, translations of its federal grants action plans and amendments. If there is a consistent need for translations, by populations of LEP Kentuckians, BGADD will consider additional appropriate measures to serve the language access needs of those persons.

Requirements for Recipients

Recipients of federal funds awarded or drawn through BGADD are required to ensure that meaningful access to services is assured for their LEP clients. Recipients must provide language assistance services that result in timely, accurate, and effective communication at no cost to LEP clients and/or their beneficiaries. Such language assistance services are to be provided in accordance with the guidelines set forth in the U.S. Department for Health and Human Services “Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons” and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-Discrimination in Federally-Assisted Programs of the Department of Transportation effectuation of Title VI of the Civil Rights Act of 1964. BGADD is available to assist Recipients in identifying and developing appropriate language assistance measures.

If an application is funded, the local government or nonprofit agency will be required to conduct a four-factor analysis, develop a LAP, if necessary, and provide a description of outreach efforts during the Letter of Conditional Commitment stage. Particular attention will be given to plan details for projects including acquisition and/or relocation, housing rehabilitation, and/or water/sewer hookups.

In order to determine if language assistance is required by recipients of federal funds through BGADD, all Recipients are required to follow the measures outlined below.

1. Conduct the four-factor analysis prior to advertising for application public hearing.
2. If the four-factor analysis reveals there are 1,000 or more LEP persons, or 5 percent or more LEP persons in the eligible population in the jurisdiction or among current beneficiaries, the applicant will provide appropriate language assistance by: 1) translating all vital documents; 2) posting notices of application public hearings in areas frequented by LEP persons of the threshold population(s) in the language(s) spoken; and 3) providing translation services at public hearings, if requested to do so by LEP persons.

3. If the four-factor analysis reveals there are less than 50 LEP persons but 5 percent or more LEP persons in the eligible population in the jurisdiction or among current beneficiaries, the applicant will provide appropriate language assistance by: 1) posting notices of application public hearings in areas frequented by LEP persons of the threshold population(s) in the language(s) spoken; and 3) providing translation services at public hearings, if requested to do so by LEP persons.
4. If the four-factor analysis reveals there are less than 50 LEP persons and less than 5 percent LEP persons in the eligible population in the jurisdiction or among current beneficiaries, the applicant will provide appropriate language assistance by: 1) providing translation services at public hearings, if requested to do so by LEP persons.

If a LAP is required, the Recipient's LAP will include certifications that LAP has been developed, adopted, and will be implemented for all Federally-funded projects. The Recipient's LAP will include an identification of all LEP populations exceeding 1,000 or five percent of total jurisdiction population, whichever is less, the identification of materials to be made available to LEP persons, the means by which the materials will be made available to LEP persons, and the identification of any other translation services which may be necessary. Recipients will be monitored for implementation of their LAPs.

Monitoring, Evaluation and Updating

All agencies receiving federal funds through the BGADD will report annually on services provided to LEP persons. Agencies will review their respective plans each year to evaluate their effectiveness and to make any needed changes. BGADD will assist agencies in finding appropriate translation resources, and disseminate translated HUD notices, brochures, posters and other documents.

BGADD will monitor the delivery of any required language assistance on an ongoing basis. It will review the LAP, evaluate the effectiveness of its implementation, and update the LAP, on an annual basis, in order to ensure continued responsiveness to community needs.

The LAP evaluation will consist of:

- Revision of the LAP, as necessary, by monitoring changes in demographics and services provided, updating available resources and tools, modifying methods of implementation and addressing any issues of concerns.
- Analysis of language assistance usage, including the amount of language service requests, surveying the languages most frequently encountered, identifying the primary modes of communication, and costs associated with services rendered.

- Assessment of response to requests by LEP individuals and Recipients regarding the delivery of language assistance services.

Availability and Access

The BGADD LAP is available to the public on our website at www.bgadd.org. This information is available in a form accessible to persons with disabilities, and others, upon written request to: Executive Director, BGADD, 699 Perimeter Drive, Lexington, Kentucky, 40517.

Citizens, public agencies and other interested parties will have reasonable and timely access to information and records relating to the LAP. All public records under KRS Statute 61.870-884 will be made accessible to interested individuals and groups during normal working hours.

Complaints

At any time, citizens may submit complaints related to the DLG LAP by writing the Executive Director, BGADD, 699 Perimeter Drive, Lexington, Kentucky, 40517.

The BGADD will provide a written response to every written citizen complaint that relates to the BGADD LAP within 15 working days.

Appendix A

2011 American Community Survey, 1-Year Estimates – Kentucky – 11/14/2013

Subject	Total Population	Percent of Population	Speaks English Less Than “Very Well”	Speaks English Less Than “Very Well”
Speaks only English	3,885,279	95.1%	(# Population)	(% Population)
Speaks a language other than English	199,559	4.9%	84,369	2.1%
Spanish or Spanish Creole	102,950	2.5%	48,572	2.5%
Other Indo-European languages	50,550	1.2%	14,966	1.2%
Asian and Pacific Island languages	32,075	0.8%	15,521	0.4%
Other languages	13,984	0.3%	5,310	0.1%

Appendix B

2007-2011 American Community Survey 5-Year Estimates

S1601: Language Spoken at Home

Supporting documentation on code lists, subject definitions, data accuracy and statistical testing is found on the American Community Survey (ACS) website, Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates and response rates) can be found on the ACS website in the Methodology section.

Although the ACS produces population, demographic and housing unit estimates, it is the U.S. Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

County	Total Population	Language Spoken by Persons with Limited English Proficiency			
		Spanish or Spanish Creole	Other Indo-European languages	Asian and Pacific Island languages	Other languages
Anderson	19,927	393 2.0%	199 1.0%	42 0.2%	0 0.0%
<i>Bourbon</i>	18,753	<i>1,038</i> <i>5.5%</i>	75 0.4%	61 0.3%	0 0.0%
Boyle	26,754	819 3.1%	241 0.9%	153 0.6%	78 0.3%
Clark	33,251	827 2.5%	133 0.4%	96 0.3%	10 0.0%
Estill	13,851	212 1.5%	42 0.3%	16 0.1%	0 0.0%
<i>Fayette</i>	273,590	<i>16,307</i> <i>6.0%</i>	6,566 2.4%	6,067 2.2%	1,460 0.5%
Franklin	46,182	1,548 3.4%	185 0.4%	440 1.0%	47 0.1%
Garrard	15,905	220 1.4%	64 0.4%	8 0.1%	0 0.0%
Harrison	17,706	273 1.5%	159 0.9%	0 0.0%	39 0.2%
Jessamine	44,597	979 2.2%	446 1.0%	212 0.5%	259 0.6%
Lincoln	23,112	88 0.4%	92 0.4%	14 0.1%	0 0.0%
Madison	77,358	1,534 2.0%	542 0.7%	476 0.6%	53 0.1%

County	Total Population	Language Spoken by Persons with Limited English Proficiency			
		Spanish or Spanish Creole	Other Indo-European languages	Asian and Pacific Island languages	Other languages
Mercer	19,860	168 0.8%	79 0.4%	26 0.1%	0 0.0%
Nicholas	6,664	56 0.8%	187 2.8%	14 0.2%	20 0.3%
Powell	11,858	75 0.6%	47 0.4%	10 0.1%	0 0.0%
Scott	42,678	1,139 2.7%	384 0.9%	288 0.7%	0 0.0%
<i>Woodford</i>	23,231	<i>1,327</i> <i>5.7%</i>	558 2.4%	51 0.2%	0 0.0%

Appendix C

List of Formal Interpreters (for any language if necessary and cost is not prohibitive):

- Catholic Charities - Louisville, KY 502-636-9263
- The International Center – Bowling Green, KY 270-781-8336
- Language Service Associates - eMARS
- www.languageline.com 1-877-886-3885

Additional local translators and interpreters can be found at Kentucky's Finance and Administration Cabinet's Office of Procurement Services (OPS) at www.eprocurement.ky.gov/translators.

Written translation of HUD documents can be found at:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep

Appendix D

Examples of Vital Documents:

- Citizen Participation Notices
- Survey Instruments
- Housing-Related Documents
 - Lead-Based Paint Notification
 - Application
 - Lease
 - Note
 - Mortgage
- Drug-Free Certification

Environmental Justice (EJ)

Executive Order (E.O. 12898) was issued to focus federal attention on the environmental and human health conditions in minority and low-income communities to promote non-discrimination in federal programs substantially affecting human health and the environment and to provide minority and low-income communities access to public information on and an opportunity for public participation in matters relating to human health or the environment.

The KYTC will utilize the US Census Bureau data, the American Community survey data, and the following checklist to identify targeted populations:

Make a list of potential demographic groups to consider for the region or start with the required EJ populations defined by the Executive Order and supportive guidance

Consider groups that are underrepresented in typical public involvement and transportation decision making processes, have limited access to the full benefits of the transportation system, or have encountered disproportionate impacts from past transportation decisions

Decide on the level of detail required for identifying groups spatially and identifying data sources to use to conduct a spatial demographic profile

Engage leaders and representatives of demographic groups to help identify target populations, spatially and non-spatially

David Duttlinger
Executive Director
BGADD

Date

Mike Pryor
Chairman
BGADD Board of Directors

Date