

**TITLE VI
IMPLEMENTATION PLAN**

**Bluegrass Area Development District
BGADD**

January 1, 2018-December 31, 2018

**David Duttlinger, Executive Director
Kim Fry, Director, Human Resources & Title VI Coordinator
Robert Casher, Public Administration Specialist, Title VI Coordinator**

Anderson
Boyle
Bourbon
Clark
Estill
Fayette
Franklin
Garrard
Harrison
Jessamine
Lincoln
Madison
Mercer
Nicholas
Powell
Scott
Woodford

TABLE OF CONTENTS

I.	Glossary / Definitions.....	PAGE 3
II.	Overview.....	PAGE 7
III.	Responsible Official.....	PAGE 9
IV.	Statement of Assurances.....	PAGE 10
V.	Program Review Procedures.....	PAGE 13
VI.	Programs or Activities Subject to Title VI.....	PAGE 13
VII.	Complaint Procedures.....	PAGE 15
VIII.	Compliance.....	PAGE 17
IX.	Training.....	PAGE 18
X.	Goals and Accomplishments.....	PAGE 18
XI.	Public Notification.....	PAGE 19
XII.	Data Collection/Reporting/Analysis.....	PAGE 20
XIII.	Minority Representation.....	PAGE 21
XIV.	Language Access Plan.....	PAGE 28
XV.	Appendices.....	PAGE 33
XVI.	Environmental Justice.....	PAGE 39

I. GLOSSARY/DEFINITIONS

Area Development Districts (ADD): focus on developing and sustaining the fundamental building blocks for state, regions and local communities in today's rapidly changing global marketplace. Including but not limited to traditional emphasis on strategic planning and project funding for clean and safe drinking water systems, health care facilities, affordable housing, small business development and transportation improvements.

Affirmative Action: a good-faith effort to eliminate past and present discrimination in all federally assisted programs and to ensure future nondiscriminatory practices.

African American (Black): A person having origins in any of the black racial groups of Africa.

American Indian or Alaska Native: a person having origins in any of the original peoples of North and South America (including Central America) who maintains cultural identification through tribal affiliation or community attachment.

Applicant: an eligible public entity or organization that submits an application for financial assistance under a program administered on behalf of the State.

Asian: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.

Assurance: a written “policy statement” or “contractual agreement” signed by the agency head in which a recipient agrees to administer federally assisted programs in accordance with civil rights laws and regulations.

Beneficiary: any person or group of people (other than states) entitled to receive benefits, directly or indirectly, from any federally assisted program (*i.e.*, relocated persons, impacted citizens, communities, etc.).

Complaint: a verbal or written allegation of discrimination that indicates that a federally assisted program is operated in such a manner that it results in disparity of treatment to persons or groups of persons because of race, color or national origin.

Compliance: a satisfactory condition wherein an applicant, recipient, or sub recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good-faith effort toward achieving this end has been made.

Contract: a mutually binding legal relationship or any modification thereof obligating the seller to furnish supplies or services, including construction, and obligating the buyer to pay for them. Throughout this document, a lease is considered a contract.

Contractor: any person, corporation, partnership, organization, or incorporated association that participates, through a contract or subcontract, in any program or activity covered by this plan including lessees.

Discrimination: involves any act or inaction, whether intentional or unintentional in any program or activity of a federal aid recipient, sub recipient, or contractor, which results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, sex, national origin, age, disability or in the case of disability, failing to make a reasonable accommodation.

Division: one of the administrative subdivisions of an office of the Bluegrass Area Development District.

Executive Director: The BGADD Executive Director has authority to appoint Title VI Designee(s).

Federal Assistance:

- Grants and loans of federal funds
- The grant or donation of federal property and interests in property
- The detail of federal personnel
- The sale and lease of, and the permission to use (on other than a casual or transient basis), federal property or any interest in such property without
- Consideration or with nominal consideration, or with consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient

Any federal agreement, arrangement, or other contract that has, as one of its purposes, the provision of assistance

Grantee: any public or private agency, institution or organization to whom federal financial assistance is intended for any program.

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin, regardless of race.

Indo-European: of or relating to a group of languages that includes many of the languages spoken in Europe, in the parts of the world colonized by Europeans, and in parts of Asia

Interpretation: The process of listening to something in one language and orally interpreting it in another. The mix of LEP services under the Oral Languages Services is as follows:

- Hiring bilingual staff
- Hiring staff interpreters
- Using telephone interpreter lines
- Using community volunteers
- Use of family members, friends, and other customers/passengers as interpreters

Limited English Proficiency or LEP: Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient.

Minority: A person or groups of persons differing from others in some characteristics who may be subjected to differential treatment based on race, color or national origin. Includes *African Americans, Hispanics or Latinos, American Indian or Alaska Native, Asians and Native Hawaiian or Other Pacific Islander*.

Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Non-compliance: the condition wherein a recipient has failed to meet prescribed requirements and has shown a lack of good-faith effort in implementing all of the Title VI requirements.

Non-minority or non-minority group people: Caucasians

Persons: Where designation of persons by race, color or national origin is required, the following designations ordinarily may be used: "White not of Hispanic origin," "Black not of Hispanic origin," "Hispanic," "Asian or Pacific Islander," "American Indian or Alaskan Native." Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or a regional basis.

Public participation: an open process in which the rights of the community to be informed to provide comments to the Government and to receive a response from the Government are met through a full opportunity to be involved and to express needs and goals.

Primary recipient: KYTC or any department, division, or agency authorized to request federal assistance on behalf of sub-recipients and to distribute financial assistance to sub-recipients' contracts for carrying out a program.

Program: includes any highway, project, or activity that provides services, financial aid or other benefits to individuals, including education or training, work opportunities, health, welfare, rehabilitation, housing or other services, whether provided directly by the recipient of federal financial assistance or provided by others through contracts or other arrangements with the recipient (i.e. Planning, Environment, Design, Right-of-Way, Construction, Safety, & Research).

Program area officials: the officials who are responsible for carrying out technical program responsibilities.

Recipient: Kentucky or any political subdivision or instrumentality thereof or any public or private agency, institution, or organization or other entity; or any individual in Kentucky to whom federal assistance is extended, either directly or through another recipient, for any program. Recipient includes any successor, assignee, or transferee thereof. The term “**recipient**” does not include any ultimate beneficiary under any such program. Examples of recipients include MPOs, Council of Governments (COG), towns, cities, counties, school districts or any sub recipient.

Sub-grantee: Any public or private agency, institution, or organization to whom federal financial assistance is intended (through another recipient) for any program.

Sub-recipient: Any public or private agency, institution, or organization to whom federal financial assistance is intended (through another recipient) for any program

Translation: Translation is the replacement of a written text from one language into an equivalent written text in another language.

Title VI Officer, Coordinator or Liaison: refers to the responsible official in matters relating to Title VI. The Title VI Officer, Coordinator or Liaison reports to and assists the Executive Director of BGADD in carrying out the Title VI responsibilities of the Bluegrass Area Development District.

Title VI Program: the system of requirements developed to implement Title VI of the Civil Rights Act of 1964. When appropriate, the phrase “Title VI Program” also refers to the civil rights provisions of other federal non-discrimination authorities to the extent that they prohibit discrimination on the grounds of race, color, national origin, sex, age and disability, including income level and Limited English Proficiency in programs or activities receiving federal financial assistance.

White: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

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.

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

II. OVERVIEW

Title VI of the Civil Rights Act of 1964 is a non-discrimination statute. Specifically, Title VI provides that "no person in the United States shall, on the ground 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" (42 U.S.C. Section 2000d). Each federal department and agency, which is empowered to extend Federal financial assistance to any program or activity, by way of grant, loan, federal personnel or any federal agreement contract is authorized and directed to make the provisions of Section 2000d of this title.

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 works to ensure that nondiscriminatory services are offered throughout the region thereby enhancing both the quality of life and the economic vitality.



Address
699 Perimeter Drive
Lexington, Kentucky 40517

Contact
ph: 859.269.8021
fax: 859.269.7917

Web
www.bgadd.org

Anderson

Boyle

Bourbon

Clark

Estill

Fayette

Franklin

Garrard

Harrison

Jessamine

Lincoln

Madison

Mercer

Nicholas

Powell

Scott

Woodford

Title VI Policy Statement

Pursuant to and consistent with Title VI of the Civil Rights Act of 1964, 78 Stat. 252,42 U.S.C. 2000d-4, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, (49 CFR, Part 21 Nondiscrimination in Federally Assisted Program of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964

It is the policy of the Bluegrass Area Development District that no person, on the grounds of race, color, national origin, sex, age and disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by the Bluegrass Area Development District, regardless of whether those programs and activities are Federally funded or not.

A handwritten signature in black ink that reads 'David Duttlinger'.

David Duttlinger
Executive Director
BGADD

11-7-17

Date

III. 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
(859) 269-7917 fax
dduttlinger@bgadd.org

Kim Fry, HR. Director, Title VI Coordinator
699 Perimeter Dr.
Lexington, KY 40517
(859) 269-8021
(859) 269-7917 fax
kfry@bgadd.org

Robert Casher, Title VI Coordinator/PAS
699 Perimeter Drive
Lexington, KY 40517
(859) 269-8021
(859) 269-7917 fax
bcasher@bgadd.org

Kim Fry and Robert Casher are designated as the Title VI Coordinators and is responsible for the oversight and coordination of BGADD's compliance with Title VI and all related statutes, regulations and directives. The Title VI Coordinator has direct access to the BGADD's Executive Director. General inquiries should be directed to the Title VI Coordinators but are not limited to the following:

- Coordinating Title VI program development with Metropolitan Planning Organizations (MPOs), Local Public Agencies (LPAs) and division managers
- Establishing procedures for processing Title VI program reviews and/or sub-recipient/contractor reviews
- Coordinating training Title VI training for BGADD staff, sub-recipients/contractors and stakeholders
- Preparing required reports
- Providing guidance and advice on the Title VI Program to BGADD staff.
- Annually updating BGADD's Title VI Program Plan

IV. 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.

Standard Title VI Assurance

Bluegrass Area Development District

Anderson

Boyle

Bourbon

Clark

Estill

Fayette

Franklin

Garrard

Harrison

Jessamine

Lincoln

Madison

Mercer

Nicholas

Powell

Scott

Woodford

The Bluegrass Area Development District (hereinafter referred to as the "Recipient") hereby agrees that as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation, or any other Federal agency, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252,42 U.S.C. 2000d-4, (herein after referred to as the "Act", and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, (49 CFR, Part 21 Nondiscrimination in Federally Assisted Program of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") and any other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability, 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 the U.S. Department of Transportation, including the Federal Highway Administration or any other Federal Department, and hereby gives assurance that it will promptly take any necessary measures to effectuate this agreement. This assurance is required by subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Highway Program as well as any other Federally funded program:

1. The Recipient agrees that each "facility" and each "program" as defined in subsections 21.23 (b) and 21.23 € of the Regulations will be (with regard to a "facility" operated in compliance with all requirements imposed by or pursuant to the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal-aid Highway program and, in an adapted form in all proposals for negotiated agreements.

Construction Proposals

The BGADD in accordance with the provisions of the Title VI of the Civil Rights Act of 1964, (78 Stat. 252) and the regulations of the Federal Department of Transportation (49 CFR, Part 21), issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that the contract entered into pursuant to this advertisement will be awarded to the lowest responsible bidder without discrimination on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability.

Agreement for Other Services

Compliance with Regulations: The Consultant shall comply with the regulations of the BGADD relative to nondiscrimination in Federally Assisted Programs of BGADD which are herein incorporated by reference and made a part of this contract.

3. That the Recipient shall insert one of these nondiscrimination clauses in every contract subject to the Act and Regulations.
4. That the Recipient shall also insert into every relevant contract a clause stating that the contractor will not discriminate against any employee or applicant for employment because of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, these assurances shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form of, or for the acquisition of real property, these assurances shall extend to rights to space on, over, and under such property.
7. That these assurances obligate 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, 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 was extended, or for another purpose involving the provision of similar services or benefit; or (b) the period during which the Recipient retains ownership or possession of the property.
8. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the delegated authority, to give a reasonable guarantee that it, other recipients, sub-grantees, contractors, sub-contractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed by or pursuant to the Act, the Regulations and these assurances.
9. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and these assurances.

These assurances are given in consideration of and, for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts, and/or other Federal financial assistance extended after the date hereof, to the Recipient, by the U.S. Department of Transportation under the Federal-aid Highway Program. The person whose signature appears below is authorized to sign these assurances on behalf of the Recipient.



David Duttlinger
Executive Director
BGADD

V. PROGRAM REVIEW PROCEDURES

The BGADD is responsible for the following under Title VI:

- Collecting and analyzing data on minority and low- income populations to determine the potential impact of proposed plans, programs and projects
- Ensuring all contract documents contain the appropriate Title VI provisions
- Consulting with the Title VI Officer, Coordinator or Liaison and the OCRSBD Executive Director when complaints are received or issues arise during a public hearing/meeting
- Ensuring that all people are treated equitably regardless of race, color or national origin
- Monitoring Title VI accomplishments, notifying the Title VI Officer, Coordinator or Liaison of problem areas and summarizing activities for inclusion in the Title VI Plan Update
- Developing and updating internal policies and procedures to ensure Title VI compliance during all phases of projects and activities
- Ensuring that all business pertaining to the selection, negotiation, and administration of consultant contracts and agreements is accomplished without discrimination based on race, color or national origin
- Ensuring that efforts are made to include minority and women owned businesses in consideration for contracts
- Ensuring that internal and external publications and all other relevant communications disseminated to the public include the Title VI policy reference
- Providing reasonable accommodations, information in the appropriate language or interpreters as needed for individuals with disabilities and LEP persons

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.

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.

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

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 and/or the Title VI Coordinator:

David Duttlinger, Executive Director
699 Perimeter Drive
Lexington, KY 40517
(859) 269-8021
(859) 269-7917 fax
dduttlinger@bgadd.org

Kim Fry, HR. Director, Title VI Coordinator
699 Perimeter Dr.
Lexington, KY 40517
(859) 269-8021
(859) 269-7917 fax
kfry@bgadd.org

Robert Casher, Title VI Coordinator/PAS
699 Perimeter Drive
Lexington, KY 40517

(859) 269-8021
(859) 269-7917 fax
bcasher@bgadd.org

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 and/or the Title VI Coordinator 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 will hold Title VI training seminars annually, October 30, 2019 for all employees. Supervisors will be trained semi-annually, June 24, 2019 and December 16, 2019. All new employees shall receive a copy of BGADD's Title VI plan as part of the orientation process. As with all policies they will be encouraged to direct questions to their supervisor or the Human Resources Director.

X. GOALS AND ACCOMPLISHMENTS

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 accomplishments.

XI. PUBLIC NOTIFICATION

The BGADD will disseminate Title VI Program information to employees, contractors, sub-recipients and beneficiaries, as well as to the public. A variety of public notification and participation procedures will be used to encourage the early and continuous involvement of citizens, communities, and others interested in the planning process and decisions of the BGADD. The BGADD will discuss and/or distribute Title VI information using mass media including, but not limited to the following:

- Policy statements
- Inclusion of Title VI language in contracts
- New employee orientation
- Federal EEO posters
- BGADD website: bgadd.org
- Standard procedures manual
- Significant publications, i.e., newspapers, brochures, and written literature
- Mailings
- Meetings open to the public
- Events

Further notices informing the public and all employees that the BGADD complies with Title VI of the Civil Rights Act of 1964 will be displayed in a prominent place.

Title VI Coordinator,
Kim Fry Human Resources Director-Title VI/ADA/504 Coordinator
Robert Casher, Public Administration Specialist
BGADD
699 Perimeter Drive
Lexington, KY 40517
Phone: (859) 269-8021
Fax: (859) 269-7917

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 BGADD office. Information is also available on the website: bgadd.org. Title VI application forms and checklists for sub-recipients are also available at the BGADD office and the website.

XII. DATA COLLECTION/REPORTING ANALYSIS

Statistical data on race, color, national origin, sex, age, disability, and LEP of participants in and beneficiaries of the BGADD's programs, (i.e., affected populations, and participants) will be gathered, analyzed, and maintained by the BGADD to determine the benefits and burdens to the population, including minority and low-income populations. Data gathering procedures will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of Title VI program administration. Analysis of the data collected by the program emphasis areas may include:

- The race, color, national origin, sex, age, disability, income and LEP of the population eligible to be served
- Socioeconomic Assessment to evaluate project's potential impacts to the human environment
- Persons to include in the decision-making process
- Percent of benefits allocated to persons below the poverty line vs. persons above the poverty line
- Distribution of benefits (dollars, facilities, systems, projects) to groups and communities
- Projected population increases versus planned facilities and types of facilities
- Language needs assessment
- Transportation needs of all persons within boundaries of plans or projects
- Strategies to address impacts
- The manner in which services are or will be provided and the related data necessary for determining whether any persons are or will be denied such services on the basis of prohibited discrimination
- The location of existing or proposed facilities connected with the program and related information for determining whether the location has or will have the effect of unnecessarily denying access to any persons on the basis of prohibited discrimination
- The present or proposed membership, by race, color, national origin, sex, disability and age, in any planning or advisory body which is an integral part of the program
- Strategies to disseminate information

A. Complaints

1. The Title VI Coordinator 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 Title VI Coordinator 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 KYTC and other appropriate Cabinets as necessary, 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	61		
White Males	152		
Black Females	9		
White Females	7		
*Elected Positions			

B. Special Emphasis Program Area:


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.

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

RACE/NATIONAL ORIGIN	NUMBER	Percentage
White Females	41	70.69
White Males	15	25.87
Black Females	1	1.72
Black Males	1	1.72
Hispanic Females		
Hispanic Males		
American Indian Females		
American Indian Males		
Other Females		
Other Males		
Total	58	100.00

External Complaint Form

 Bluegrass Area Development District External Discrimination Complaint					
Instructions: Complete and sign this form and mail, fax, or deliver to the Bluegrass Area Development District Address: BGADD, 699 Primeter Dr, Lexington, KY 40517, Attn: Title VI Complaint Coordinator Fax: BGADD, 699 Primeter Dr, Attn: Title VI Complaint Coordinator (859) 269-7917					
SECTION 1: COMPLAINANT INFORMATION					
FIRST NAME	MI	LAST NAME	PHONE	ALTERNATE PHONE	EMAIL ADDRESS
MAILING ADDRESS (street)			CITY	STATE	ZIP
SECTION 2: COMPLAINT DETAILS					
Please indicate the basis of your complaint:					
<input type="checkbox"/> Race _____	<input type="checkbox"/> Gender _____	<input type="checkbox"/> National Origin _____			
<input type="checkbox"/> Color _____	<input type="checkbox"/> Disability _____	<input type="checkbox"/> Limited English Proficiency (LEP) _____			
<input type="checkbox"/> Age _____	<input type="checkbox"/> Low Income _____				
Provide the date and place(s) of the alleged discriminatory action(s). Please include the earliest date of discrimination and the most recent date of discrimination.					
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently than you. <i>(Attach additional pages if necessary.)</i>					
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances. Tell what action you took which you believe was the cause for the alleged retaliation. <i>(Attach additional pages if necessary.)</i>					
Names of individuals, agency, or department responsible for the discriminatory action(s):					
	Name:		Address:		Phone:
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____



External Discrimination Complaint

Names of persons (witnesses, fellow employees, supervisors, or others) whom contact for additional information to support or clarify your complaint: *(Attach additional pages if necessary.)*

	<u>Name:</u>	<u>Address:</u>	<u>Phone:</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

Please provide any additional information and/or photographs, if applicable, that you believe will assist with an investigation. *(Attach additional pages if necessary.)*

Photographs submitted with complaint? Yes No

SECTION 3: ACTIONS:

Have you filed, or do you intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. *(Check all that apply)*

- | | |
|--|---|
| <input type="checkbox"/> U.S. Department of Transportation _____ | <input type="checkbox"/> Office of Federal Contract Compliance Programs _____ |
| <input type="checkbox"/> Federal Highway Administration _____ | <input type="checkbox"/> U.S. Equal Employment Opportunity Commission _____ |
| <input type="checkbox"/> Federal Transit Administration _____ | <input type="checkbox"/> U.S. Department of Justice _____ |
| <input type="checkbox"/> Other _____ | |

Have you discussed the complaint with any BGADD representative? Yes No
If yes, provide the name, position, and date of discussion.

Name of BGADD Representative	Position of Representative	Date of Discussion

Do you have an attorney regarding this matter? Yes No
If yes, please provide attorney's contact information.

Name of Law Firm	Name of Representing Attorney
Mailing Address	Phone

Briefly explain what remedy or action you are seeking for the alleged discrimination.

We cannot accept an unsigned complaint. Please sign and date the complaint form below.

Complainant's Signature	Date

FOR OFFICE USE ONLY	
Date Complaint Received: _____	Case #: _____
Processed by: _____	Date Referred: _____
Referred to: <input type="checkbox"/> U.S. DOT <input type="checkbox"/> FHWA <input type="checkbox"/> FTA <input type="checkbox"/> OFCCP <input type="checkbox"/> Other _____	

Título VI Denuncia Forma BGADD

Información del demandante:

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Zip: _____

Teléfono (casa): _____ (trabajo): _____

Nombre de la agencia, departamento o programa que cree discriminado:

Agencia/Departamento: _____

Nombre de persona: _____

En sus propias palabras describen la discriminación alegada y quién crees que fue el responsable:

Lista de nombres y la información de contacto de las personas que puedan tener conocimiento de la presunta discriminación.

La queja no se aceptará si no ha sido firmado. Por favor firme y feche este formulario de queja. Usted puede conectar cualquier material escrito u otra información de soporte que crees que es pertinente a su queja.

Firma del denunciante

Fecha

**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: _____

XIV. LANGUAGE ACCESS PLAN

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 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.

XV. APENDICES

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	1,038 5.5%	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	16,307 6.0%	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%
Woodford	23,231	1,327 5.7%	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

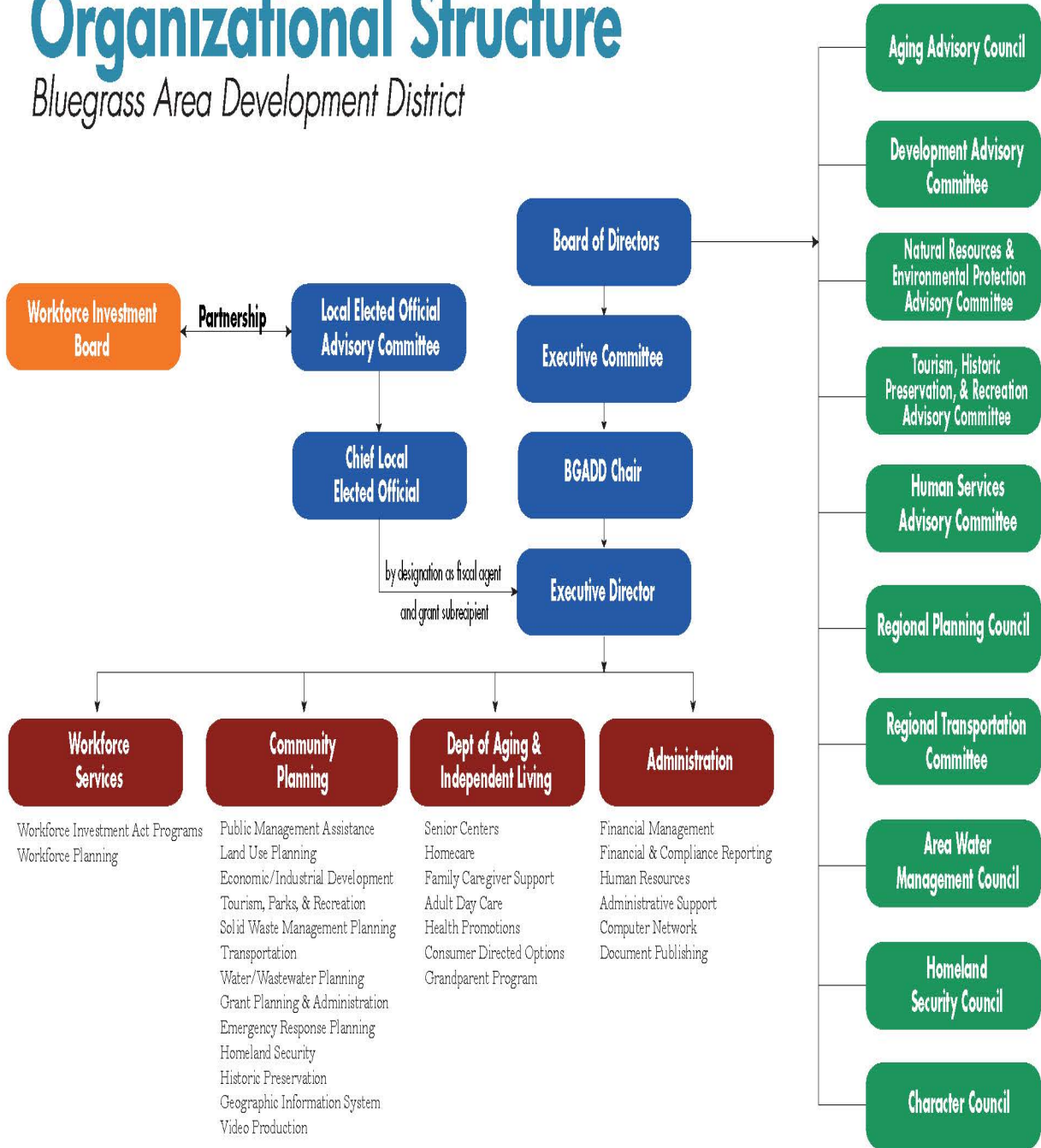
Examples of Vital Documents:

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

Appendix E

Organizational Structure

Bluegrass Area Development District



XVI. 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 BGADD 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

Approved: April 24, 2019

Chair

Secretary