



Pennyryle Area Development District

Title VI Implementation Plan

January 1, 2019 – December 31, 2019

# Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement	3
1.1 Standard Title VI Assurance	5
2.0 Introduction & Description of Services	5
2.1 Program Review Procedures	5
2.2 Programs or Activities Subject to Title VI	6
2.3 PEADD Organizational Chart	7
2.3 First Time Applicant Requirements	8
2.4 Annual Certifications and Assurances	8
2.5 Title VI Plan Concurrence and Adoption	8
3.0 Title VI Notice to the Public	9
3.1 Notice to Public	9
3.2 Notice Posting Locations	9
4.0 Title VI Procedures and Compliance	10
4.1 Complaint Procedure	10
4.2 Record Retention and Reporting Policy	14
4.3 PEADD Title VI Training Plan	14
4.4 Goals and Accomplishments	14
4.5 Contractors and Subcontractors	15
5.0 Title VI Investigations, Complaints, and Lawsuits	17
6.0 Public Participation Plan	18
7.0 Language Assistance Plan	19
8.0 Transit Planning and Advisory Bodies	20
8.1 Special Emphasis Program Areas	20
9.0 Environmental Justice	21
10.0 Title VI Equity Analysis	22
11.0 Review of STA Directives	23
12.0 Appendices	
APPENDIX A    GENERAL REPORTING REQUIREMENTS	25
APPENDIX B    TITLE VI NOTICE TO PUBLIC	26
APPENDIX C    TITLE VI COMPLAINT FORM	28
APPENDIX D    PUBLIC PARTICIPATION PLAN	30
APPENDIX E    LANGUAGE ASSISTANCE PLAN	32
APPENDIX F    TITLE VI PLAN ADOPTION AND APPROVAL	36
APPENDIX G    SUMMARY OF ECONOMIC CONDITIONS	37

## **1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan**

The Pennyrile Area Development District (PEADD) (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 it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat.252, 42 U.S.C.2000d-4 (hereinafter 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 Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”) and 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, Disability, Limited English Proficiency, or Low Income, 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, and hereby gives assurance that it will promptly take any measures necessary 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 respects to its Federal-aid Highway Program:

1. That the Recipient agrees that each “program” and each “facility as defined in sub-sections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted, or 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 and made in connection with all programs administered by the Recipient and in adapted form in all proposals for negotiated agreements:

The (Recipient), in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat.252, 42 U.S.C 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation is-sued pursuant to such Act, hereby notifies all bidden that it will affirmatively insure that in any contact entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, col-or, or national origin in consideration for an award.

3. That the Recipient shall insert one of these nondiscrimination clauses in every contract subject to the Act and the Regulations.
4. That the Recipient shall also insert into every relevant contract a clause stating that the contractors 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, Disability, Limited English Proficiency, or Low Income.
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, or under such property.

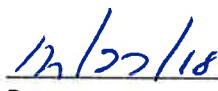
7. That these assurances obligate the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property, or real property, or interest therein, or structures, or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

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 reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

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 this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the U.S. Department of Transportation under the programs administered by the Recipient and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal-aid Highway Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

  
\_\_\_\_\_  
Jason Vincent, Executive Director  
Pennyrile Area Development District

  
\_\_\_\_\_  
Date

## **1.1 Standard Title VI Assurance**

### **Standard Title VI Assurance**

#### **Pennyrile Area Development District**

The Pennyrile 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 Administrator 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 21.23Cof 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 PEADD 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, nation 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 PEADD relative to nondiscrimination in Federally Assisted Programs of PEADD 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 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 wants, 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.

Signed and approved this 27 day of December, 2018

  
\_\_\_\_\_  
Jason Vincent  
Executive Director

## **2.0 Introduction & Description of Services**

PEADD submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

PEADD is a sub-recipient of FTA and Regional Transportation Funds and provides service in the Kentucky Counties of Caldwell, Christian, Crittenden, Hopkins, Livingston, Lyon, Muhlenberg, Todd, Trigg, also known as the Pennyrile Area.

Title VI Coordinator  
Alisha Sutton  
Administrative Officer  
300 Hammond Drive  
Hopkinsville, KY 42240  
Phone: 270-886-9484

PEADD must designate a coordinator for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by KYTC or any other regulatory agency.
- Participating in the design, development, and dissemination of the Title VI information to the public via the Notification of Beneficiaries
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Preparing required reports
- Annually updating the PEADD Title VI Program Plan
- Implement procedures for the prompt processing of Title VI complaints.

## **2.1 Program Review Procedures**

PEADD 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 KYTC 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, National Origin, Sex, Age (Over 40), Religion, Sexual Orientation, Gender Identity, Veteran Status, Disability, Limited English Proficiency, or Low Income
- Monitoring Title VI accomplishments, notifying the KYTC 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, National Origin, Sex, Age (Over 40), Religion, Sexual Orientation, Gender Identity, Veteran Status, Disability, Limited English Proficiency, or Low Income
- 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

The KYTC Title VI Officer, Coordinator or Liaison will review all ADDs and MPOs triennially using FHWA's Non-discrimination/Title VI Review Guidelines. The KYTC Title VI Officer, Coordinator or Liaison will collaborate with Program Area Title VI Liaisons to conduct periodic pre-grant and post-grant reviews of select sub-recipients of FHWA funds or other federal funds for other roadway projects (i.e. bridges) to ensure adherence to Title VI requirements. Sub-recipients are selected using a risk-based method; reviews use a combination of desk audits and onsite. Appropriate staff members will routinely confirm that guidelines provided to consultants, contractors, and sub-recipients include Title VI language, provisions and related requirements, where applicable.

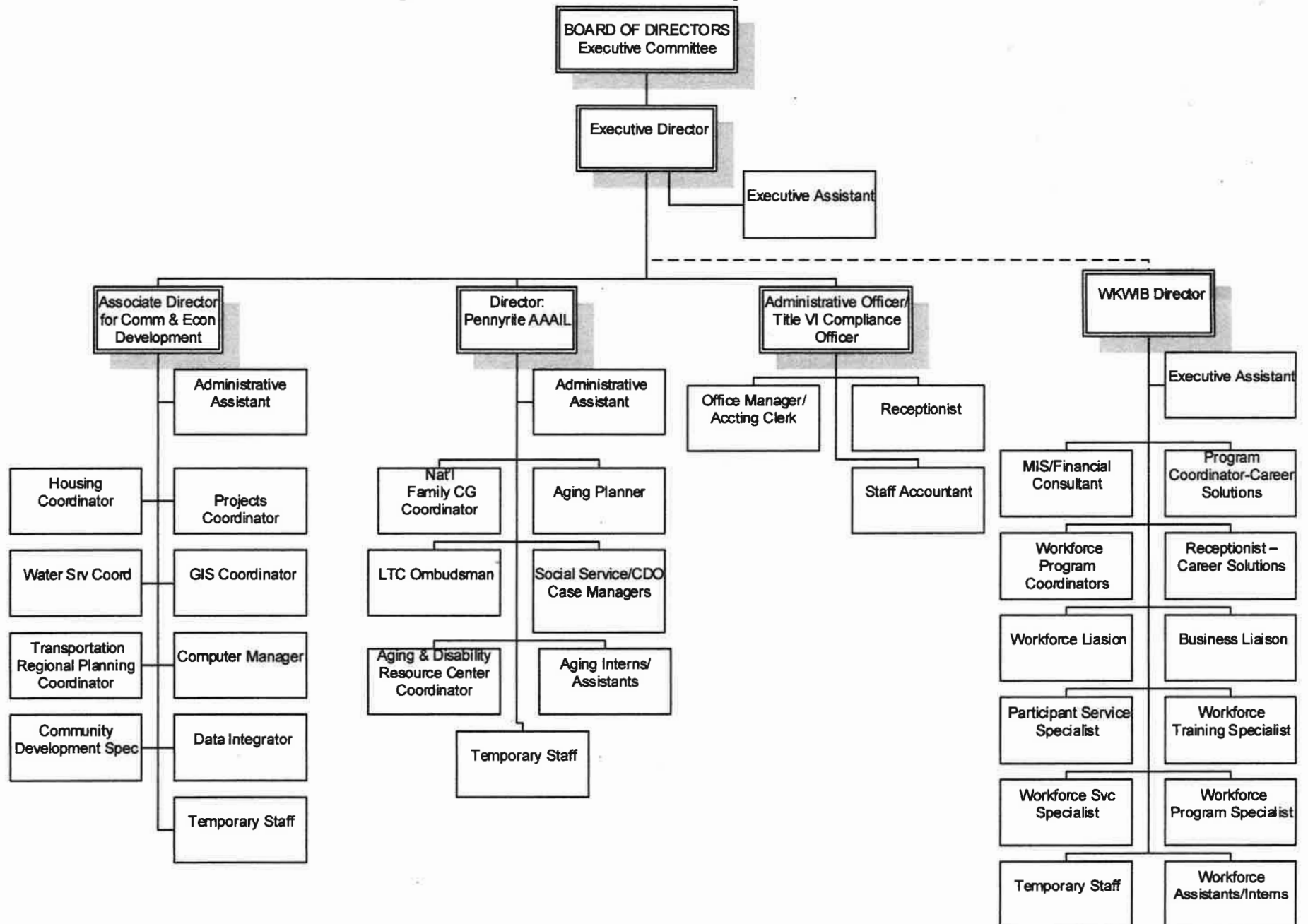
## **2.2 Programs or Activities Subject to Title VI**

PEADD program areas with Title VI responsibilities include the following departments:

- Section 5304 Public Transportation Planning Program
- Regional Transportation Planning Program



# Pennyrile Area Development District



## **2.4 First Time Applicant Requirements**

***FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.***

PEADD is not a first time applicant for FTA/KYTC funding. The following is a summary of PEADD's current and pending federal and state funding.

### **Current and Pending FTA Funding**

Regional Transportation Planning, FY 2017 \$78,067 State + \$8,674 Local

Regional Transportation Planning, FY 2018 \$78,067 State + \$8,674 Local

## **2.5 Annual Certifications and Assurances**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

PEADD will remain in compliance with this requirement by annual submission of certifications and assurances as required by all applicable State and Federal Agencies.

### **3.0 Title VI Notice to the Public**

***FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.***

#### **3.1 Notice to the Public**

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

#### **3.2 Notice Posting Locations**

The Notice to Public will be posted at many locations to apprise the public of PEADD's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of PEADD's office including the reception desk and on the PEADD's website at [www.peadd.org](http://www.peadd.org).

## **4.0 Title VI Procedures and Compliance**

***FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.***

### **4.1 Complaint Procedure**

Any person who believes that he/she or any specific class of persons has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities, based upon race, color, national origin, sex, age, religion, sexual orientation, gender identity, Veteran status, disability, limited English proficiency, or low in-come may file a written complaint. The complaint may be filed by the affected individual or a representative.

#### **Timeframe for Filing Complaints and Contact Information:**

Complaints should be filed within 180-calendar days from the date of the alleged discriminatory act. Complaints should be submitted in writing and signed and may be filed via mail, fax, in person, or email (which includes a copy of the signed/dated complaint as an attachment); for any person requiring a reasonable accommodation to the contact address listed below:

Executive Director  
Pennyrile Area Development District  
300 Hammond Drive  
Hopkinsville, KY 42240  
Phone: 270-886-9484  
Fax: 270-886-3211

Allegations of discrimination received by fax or e-mail will be acknowledged and processed.

Allegations received by phone will be reduced to writing and provided to the complainant for confirmation or revision before processing.

#### **Submitting Complaints and Receipt of Complaints**

Complaints should be submitted in the following format with the listed information:

- A signed (by the complainant or the complainant's representative) written explanation of what has happened
- The complainant's contact information
- Identification of the respondent, e.g. agency/organization alleged to have discriminated
- Sufficient information regarding the facts that led the complainant to believe that discrimination has occurred
- Date (s) of the alleged discriminatory act (s)
- Signature of the complainant or the complainant's representative

After receipt of the complaint, the Title VI Coordinator shall acknowledge the receipt in writing to the complainant. The acknowledgement shall include notification that an investigation will be conducted within 10 business days. A copy of the complaint and the acknowledgment will then be forwarded to the

Kentucky Transportation Cabinet (KYTC) ADA/Title VI Program Coordinator. Once the complaint is received, PEADD will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

The Title VI Coordinator shall conduct a full investigation, when warranted, and furnish a preliminary written report, including recommendations for resolution to PEADD Executive Director for a final determination. Personnel trained in compliance investigations will conduct investigations.

PEADD Executive Director shall notify the complainant of the final decision within 10 business days of completion of the investigation and a copy of the decision will be forwarded to the KYTC ADA/Title VI Program Coordinator.

PEADD Executive Director shall further notify the complainant of his or her right to appeal the decision to the KYTC ADA/Title VI Program Coordinator if the decision is not acceptable. Appeals should be made in writing and forwarded to the address below:

Attn: ADA/Title VI Program Coordinator  
Office for Civil Rights and Small Business Development (OCRSBD)  
200 Mero Street, Sixth Floor West  
Frankfort, KY 40622  
Phone: 800-928-3079 or 502-564-3601  
Fax: 502-564-1491

The entire procedure as outlined shall be completed within 60 days.

Records pertaining to complaints, inquiries and investigations will be maintained by the Pennyriple Area Development District.

#### **B. Agencies Authorized to Receive Complaints**

Complaints may be submitted to Pennyriple Area Development District (PEADD), Federal Highway Administration (FHWA), Kentucky Transportation Cabinet (KYTC), the United States Department of Transportation (U.S. DOT), and the U.S. Department of Justice (U.S. DOJ).

#### **C. Processing Complaints**

Complaints filed with the PEADD in which PEADD is named as the Respondent, shall be forwarded to KYTC to the attention of: ADA/Title VI Program Coordinator for processing within three (3) days of receipt.

In special cases warranting intervention to ensure justice, the FHWA may assume jurisdiction and either complete or obtain services to review or investigate a matter. Materials already obtained by State investigators may be relied upon or supplemented or the matter may be reinvestigated.

In accordance with the regulations at 23 CFR 200.9(b)(3), a copy of the complaint, together with a copy of PEADD report of the investigation, shall be forwarded to the KYTC ADA/Title VI Program Coordinator within 60 days of the date the complaint was received by PEADD. An extension of an additional 60 days may be granted by the KYTC for justifiable reasons. KYTC will forward the complaint, through the FHWA Division Office, for review and issuance.

#### **D. Acceptance and/or Dismissal of Complaints**

When any element of PEADD receives an inquiry, comment, or complaint, which alleges or implies discrimination as addressed by Title VI of the Civil Rights Act of 1964, a copy is forwarded immediately to the KYTC ADA/Title VI Program Coordinator. The original document will be forwarded to KYTC ADA/Title VI Program Coordinator, which is responsible for logging in the document and maintaining the required statistical data.

The PEADD Executive Director and KYTC ADA/Title VI Program Coordinator, or his designee in the Civil Rights office will discuss the matter to determine if it constitutes a Title VI complaint. If it is determined that the issues do not meet a Title VI complaint, the PEADD Executive Director will submit the appropriate response to KYTC ADA/Title VI Program Coordinator.

If it is determined that the issues constitute a Title VI complaint, the PEADD Executive Director or the Title VI Coordinator will determine responsibility and the need for additional information. PEADD may request additional information and/or clarification. PEADD shall maintain a log of complaints filed with and investigated by PEADD.

The PEADD Executive Director will respond in writing, acknowledging receipt of complaint within 10 days from date of receipt. After reviewing the complaint,

The OCRSBD Executive Director may recommend dismissal of a complaint for any of the following reasons:

1. The complaint filed in an untimely manner
2. The complaint does not allege a basis covered by the statutes for which KYTC is responsible
3. The complaint does not allege any harm with regard to covered programs or statutes
4. The complainant requests the withdrawal of the complaint
5. The complainant fails to respond to repeated requests for additional information needed to process the complaint
6. The complainant cannot be located after reasonable attempts
7. The complainant fails to accept a reasonable resolution. Reasonableness to be determined by the Head-quarters Civil Rights (HCR) Office via the FHWA Division Office
8. The complainant has filed a legal action in Federal District Court with the same basis and issue(s) involved in the complaint
9. The same complaint's allegations have been filed with another federal, state, or local agency

Acceptance of a complaint will be determined by the following:

1. Timely filing of the complaint
2. If the allegations involve a covered basis such as race, color, sex, age, national origin, disability, or retaliation
3. If the allegations involve a program or activity of a federal aid recipient, sub - recipient, or contractor

All complaints received by PEADD will be logged for tracking purposes.

#### **E. Withdrawal of a Complaint**

The complainant may withdraw his or her complaint at any time after filing and prior to the issuance of a de-termination or resolution by the PEADD. The complainant must submit a signed written withdrawal to the following:

Jason Vincent, Executive Director  
Pennyrile Area Development District  
300 Hammond Drive  
Hopkinsville, KY 42240  
Phone: 270-886-9484  
Fax: 270-886-3211

#### **F. Appeal Process**

If a complaint cannot be resolved by the PEADD to the satisfaction of the complainant, the complainant may appeal, in writing, to the following:

Attn: ADA/Title VI Program Coordinator  
Office for Civil Rights and Small Business Development (OCRSBD)  
200 Mero Street, Sixth Floor West  
Frankfort, KY 40622  
Phone: 800-928-3079 or 502-564-3601  
Fax: 502-564-1491

Discrimination complaints may be filed with the KYTC before, during, or after the complaint has been filed with the PEADD.

This procedure does not deprive the complainant his or her right to file a complaint with:

- The U.S. Department of Transportation: [www.dot.gov](http://www.dot.gov)
- The U.S. Department of Justice: [www.usdoj.gov](http://www.usdoj.gov)
- Federal Highway Administration: [www.fhwa.dot.gov](http://www.fhwa.dot.gov)

#### **G. Final Agency Reports**

The Headquarters Civil Rights (HCR) Office via the FHWA Division Office will issue all Final Agency Decisions (FADs) and dismissals. KYTC will forward, through the FHWA Division Office, the investigative report, investigative file, and a recommended decision to the Chief, Investigations, and Adjudications.

The Department of Justice's Civil Rights Division takes the position that a Title VI finding of violation or no violation is a federal decision that cannot be delegated. Although a state recipient can conduct a Title VI investigation of its sub-recipients or contractors and make a recommendation to the federal decision making authority, KYTC must submit its proposed dispositions to FHWA for a Final Agency Decision. The HCR may request that further investigation be undertaken if the record of evidence is incomplete.

## **4.2 Record Retention and Reporting Policy**

PEADD's Title VI Plan will be submitted to all applicable State and Federal Agencies as needed. Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

## **4.3 PEADD Title VI Training Plan**

PEADD will provide written notice to all current employees concerning the PEADD's commitment to assuring compliance with Title VI and for new employees there will be a Title VI module conducted during New Employee Orientation. The PEADD Title VI Coordinator will attend and subsequently disseminate the benefit of the training to pertinent PEADD staff.

As a part of the Sub-recipient Monitoring Program the KYTC Title VI Officer, Coordinator, or Liaison will conduct reviews and PEADD will be provided with explanatory materials and technical assistance as necessary to ensure their knowledge of, and compliance with Title VI requirements.

To aid in these efforts the OCRSBD developed the Title VI/Nondiscrimination Reference Guide for Sub-recipients. The guide serves as a point of reference and provides guidance for sub-recipients to better comprehend and comply with Title VI and the related nondiscrimination laws and regulations which are applicable to federal financial assistance that is awarded through KYTC.

During 2018, PEADD's Title VI implementation plan was disseminated to all employees along with complaint procedures. Sub-recipients of federal grants were notified of the Title VI implementation plan and complaint procedures at the time of any grant award. In addition, PEADD staff attended an internal training seminar on October 8, 2018. During this seminar, staff reviewed the implementation plan as well as watched the Title VI Training video.

Moving forward PEADD plans to continue its training efforts by implementing and providing in person training to employees, sub-recipients, and stakeholders.

## **4.4 Goals and Accomplishments**

The PEADD 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 PEADD'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.
  - 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 PEADD closer to its accomplishments.

#### **4.5 Contractors and Subcontractors**

PEADD is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. PEADD contractors and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan.

##### **Nondiscrimination Clauses**

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

**1. Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.

**2. Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

**3. Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

**4. Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Kentucky Transportation Cabinet, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Kentucky Transportation Cabinet, the Federal Highway Administration,

Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

**5. Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, PEADD shall impose contract sanctions as appropriate, including, but not limited to:

A. Withholding of payments to the Contractor under the contract until the Contractor complies, and/or

B. Cancellation, termination or suspension of the contract, in whole or in part.

**6. Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the PEADD, Kentucky Transportation Cabinet, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

## 5.0 Title VI Investigations, Complaints, and Lawsuits

***FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.***

In accordance with 49 CFR 21.9(b), PEADD must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by PEADD in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to Kentucky Transportation Cabinet.

PEADD has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

**Table 1: Summary of Investigations, Lawsuits, and Complaints**

	Date	Summary	Status	Action(s) Taken
<b>Investigations</b>				
1. None	N/A	N/A	N/A	N/A
<b>Lawsuits</b>				
1. None	N/A	N/A	N/A	N/A
<b>Complaints</b>				
1. None	N/A	N/A	N/A	N/A

## 6.0 Public Participation Plan

***FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.***

The Public Participation Plan (PPP) for PEADD was developed to ensure that all members of the public, including minorities, disabled, low income and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for PEADD. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about PEADD services and to provide a means for considering public comment. The PPP is included as Appendix D to this Title VI Plan.

### Current Outreach Efforts

PEADD is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of PEADD's recent, current, and planned outreach activities.

- Conduct local or regional public/information meetings as requested
- Utilizing the PEADD newsletter to reach, educate and inform the public on various programs
- Conducting meetings with local officials and interested community leaders
- Using e-mail lists to provide information materials to interested persons and agencies
- Using advisory committees/groups to include a more diverse group of individuals and representation of the region.
- Utilizing the PEADD Website and Facebook to post projects/information/comments and providing a link for public feed back
- Address civic groups, chamber of commerce, tourism, and government meetings
- Attending fiscal court and city council meetings
- Utilizing local newspapers to help reach more sectors of the public
- Conduct public meetings at county courthouse, city hall, or local community centers
- Utilize existing services/programs at the PEADD to distribute information (i.e. Child Care, Housing, Aging) this could provide more opportunities to reach low-income, minority, and elderly populations
- Utilize local county and city access radio stations
- Use surveys in newsletters, mail-outs, e-mails, etc. to gain public input

## 7.0 Language Assistance Plan

***FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).***

PEADD conducts regional planning within the Pennyrile Area of Eastern Kentucky. The Language Assistance Plan (LAP) has been prepared to address PEADD's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the PEADD service area there are 219,305 residents with 0.49 percent that speak a language other than English. PEADD is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The PEADD has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop LAP. The LAP is included in this Title VI Plan as Appendix E.

## 8.0 Transportation Planning and Advisory Bodies

***FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.***

The board consists of twenty-nine (29) men and nine (9) women with thirty-six (36) Caucasians and two (2) African Americans. PEADD will make efforts to encourage minority participation on the committee. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit system.

Table 2: Population by Race in PEADD Service Area and Transportation Committee in 2017

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area	183,354	6,688	23,284	1,174	312	179
Transportation	183,354	6,688	23,284	1,174	312	179

### 8.1 Special Emphasis Program Areas

The PEADD continues to attempt to identify and employ qualified minority applicants. Where minority representation in particular areas of the agency is low, the PEADD 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 PEADD's programs, the PEADD 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 PEADD 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 PEADD 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.

## **9.0 Environmental Justice**

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 PEADD 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

## 10.0 Title VI Equity Analysis

***FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.***

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, PEADD will ensure the following:

1. PEADD will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. PEADD will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, PEADD will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If PEADD determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, PEADD may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. PEADD must demonstrate and document how both tests are met. PEADD will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The PEADD has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, PEADD does not have any Title VI Equity Analysis reports to submit with this Plan. Your Community Transit will utilize the demographic maps included in Appendix F for future Title VI analysis.



## 11.0 Review of STA Directives

State Procedures, Manuals, and Directives Applicable to the Federal Highway Administration (FHWA) pro-grams

The PEADD's Title VI Implementation Plan is designed to comply with the statues and requirements under the law and as directed by FHWA to accomplish the goals of the Title VI Act of 1964. The table below is a list of external manuals that include procedures and directives used by the Kentucky Transportation Cabinet that pertain to the PEADD Regional Transportation Planning and Section 5304 Transit Planning pro-grams.

Division / Office	Procedure, Manual, Directive
Environmental Analysis	Information, Procedures, and Guidance Manual
Highway Design	Access Management Manual (Revised 3/2017)
Highway Design	Guidelines for Pedestrian & Bicycle Accommodations (Revised 3/2017)
OCRSBD	DBE Program Policy Statement (Revised 6/2016) KYTC Title VI/Nondiscrimination Guidebook for Sub-recipients (Revised 6/2017)
Office of Local Programs	Transportation Enhancement, Transportation Alternatives Program, Transportation Community and System Preservation
Office of Transportation Delivery	Oversight and implementation of various statewide public transit grants. Transportation grants offer general public transit services and assist in the mobility for the elderly, low income, and persons with disabilities
Professional Services	Professional Services Guidance Manual (Revised 3/2017)

## Training Resources

Fundamentals of Title VI/Environmental Justice: Presents a framework for using a variety of approaches and tools for accomplishing environmental justice goals in federal aid programs and other transportation pro-jects. National Highway Institute (NHI) <http://www.nhi.fhwa.dot.gov/default.aspx>

Preventing Discrimination in the Federal-Aid Program: Participants learn how to apply Title VI, as well as how to integrate law and regulation implementation in each federal aid highway project from an interdisciplinary approach. FHWA Resource Center <http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/index.cfm>

### Federal-aid Essentials

Offers a central online library of informational videos and resources, designed specifically for local public agencies. <http://www.fhwa.dot.gov/federal-aidessentials/index.cfm>

## **12.0 Appendices**

APPENDIX A	General Reporting Requirements
APPENDIX B	Title VI Notice to Public
APPENDIX C	Title VI Complaint Form
APPENDIX D	Public Participation Plan
APPENDIX E	Language Assistance Plan
APPENDIX F	PEADD Service Area and Demographic Maps
APPENDIX G	Language Data
APPENDIX H	Title VI Plan Adoption and Approval

## **APPENDIX A**

### **General Reporting Requirements**

Every three years, on a date determined by Federal Transit Administration (FTA), each recipient is required to submit the following information to the FTA as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

#### **General Requirements**

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

**APPENDIX B**  
**Title VI Notice to Public**

Notifying the Public of Rights under Title VI

Pennyrile Area Development District (PEADD)

- PEADD operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with PEADD.
- For more information on PEADD's civil rights program, and the procedures to file a complaint, contact the PEADD at:

Mailing Address: 300 Hammond Drive, Hopkinsville, KY 42240

Phone: 270-886-9484

TDD-Voice to TDD 1-800-648-6057

TDD to Voice 1-800-648-6056

Email: [jason.vincent@ky.gov](mailto:jason.vincent@ky.gov)

For more information, visit [www.peadd.org](http://www.peadd.org).

- If information is needed in another language, contact 270-886-9484. Una versión traducida de este documento puede estar disponible a petición.

## Notificación al público de derechos bajo el título VI

### Pennyrile Area Development District (PEADD)

- PEADD opera sus programas y servicios sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el título VI de la ley de derechos civiles. Cualquier persona que crea que ella o él ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja ante PEADD.
- Para más información sobre el programa de derechos civiles de PEADD y los procedimientos para presentar una queja, comuníquese con el PEADD a:

Dirección postal: 300 Hammond Drive, Hopkinsville, KY 42240

teléfono: 270-886-9484

TDD-voz a TDD 1-800-648-6057

TDD a voz 1-800-648-6056

email: [jason.vincent@ky.gov](mailto:jason.vincent@ky.gov)

para más información, visite [www.peadd.org](http://www.peadd.org)

- Si necesita información en otro idioma, comuníquese con 606-864-7391.

**APPENDIX C**  
**Pennyrile Area Development District (PeADD)**  
**Title VI Complaint Form**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Require- ments?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Sex <input type="checkbox"/> Age (Over 40) <input type="checkbox"/> Religion <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Gender Identity <input type="checkbox"/> Veteran Status <input type="checkbox"/> Disability <input type="checkbox"/> Limited English Proficiency <input type="checkbox"/> Low Income <input type="checkbox"/> Other _____				
Date of Alleged Discrimination (Month, Day, Year):				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No

<b>Section V</b>
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, check all that apply:
<input type="checkbox"/> Federal Agency <input type="checkbox"/> Federal Court <input type="checkbox"/> State Agency <input type="checkbox"/> State Court <input type="checkbox"/> Local Agency
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:
<b>Section VII</b>
Do you have an attorney regarding this matter? If yes, please provide attorney's contact information.
Name of Law Firm
Name of Representing Attorney
Mailing Address
City, State, Zip
Phone

You may attach any written materials or other information that you think is relevant to your complaint.

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

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail/fax this form to:

Jason Vincent, Executive Director  
Pennyrile Area Development District  
300 Hammond Drive  
Hopkinsville, KY 42240  
Fax: 270-886-3211

**FOR OFFICE USE ONLY**

Date Complaint Received: \_\_\_\_\_ Case # \_\_\_\_\_  
Processed By: \_\_\_\_\_ Date Referred: \_\_\_\_\_  
Referred To: ☐ KYTC ☐ Other \_\_\_\_\_

## **Título VI Denuncia Forma PEADD**

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:**

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

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**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



## **APPENDIX D**

### **Public Participation Plan**

Introduction The Pennyryle Area Development District (PEADD) will provide public involvement opportunities to allow all persons to be involved in the planning process and provide an avenue for the public voice to be heard by the key decision makers. This action will provide opportunity for all persons and interest groups to participate in the identification, evaluation, and recommendation of needs within the region. The PEADD will make every effort to include the disadvantaged and under-served populations (i.e. elderly, minority, low-income and disabled populations as well as all other effected populations in the region) on committees and/or in public meetings held for the purpose of soliciting input for plans, issues and/or projects.

The PEADD public participation plan will use a broad-brush approach because there is no overwhelming population center for the traditionally underserved, and the size of these populations is relatively small. Third party group members will be identified across the service area to aid in the outreach efforts of the traditionally underserved. The widespread use of newspapers, radio, and television can be used to potentially reach the underserved. Traveling exhibits may also be utilized during local events and strategically placed locations throughout the region to reach the underserved populations.

#### **List of Resources**

In order to expand participation opportunities, the PEADD has initiated a list of resources for general and targeted outreach methods for the region. All of the items listed may not be used at the same time or may not be used at all, but could be used in the future by the PEADD to include those persons who have been traditionally underserved by the existing transportation system and for the general participation procedures. The PEADD maintains a detailed listing of contact information and may be obtained by contacting the PEADD. :

#### **1. Third Party Groups**

The PEADD will seek to increase public outreach to the underserved populations by contacting third party groups and asking for their assistance in creating public awareness concerning transportation related is-sues. The agencies, groups or people that wish to provide assistance can be utilized to distribute materials. The members may be able to utilize their brochures, newsletters, word of mouth, etc. concerning the planning process, including but not limited to, public meetings, announcements of public review and comment periods by sharing and distributing the information with the populations they service. These groups may include, but not be limited to the following:

Senior Citizen Centers	Public Libraries
Public Health Departments	Public Transit Authorities
NAACP	Housing Authorities
U.S Post Offices	County/City Clerk's Office
United Way	Churches
Migrant Education Programs	Adult Education Programs
Chambers of Commerce	Community Based Services
Human Relations Commissions	State Government Agencies
Disabled American Veterans	University of Kentucky Extension Service
Historical Societies	Local Tourism Groups

## **2. Public Meetings**

The PEADD will hold local or regional public information/input meetings as needed to provide additional opportunities for public comments.

## **3. PEADD Website & Facebook Page**

The PEADD Website is located at [www.peadd.org](http://www.peadd.org) and the PEADD Facebook page is located at [www.facebook.com](http://www.facebook.com). Both are updated on a regular basis to provide information that is vital for the public participation process. Further commitments to providing information will continue in an effort to make documents and forms electronically accessible formats for easy viewing.

## **4. Newspapers**

Information can be sent to the local newspapers in the region. While none are identified as targeting specific traditionally underserved audiences, all have the potential to have traditionally underserved subscribers. Information can be distributed to the newspapers relating to media releases with announcements of meeting dates and locations, and announcements of documents available for public review and comment.

## **5. Radio**

Information can be sent to radio stations that serve the region. None are identified as targeting specific traditionally underserved audiences, but all have the potential to have traditionally served under-served listeners. Public meeting invitations can be sent to the stations along with media releases with announcements of meeting dates and locations and information about the planning process or documents available for public review and comment.

## **6. Television**

Information can be sent to television stations that serve the region. This could include regular net-work broadcast stations as well as local cable access channels that may be available throughout the region. These channels can also be utilized in creating public awareness.

## **7. Traveling Exhibits**

Traveling exhibits may be used to display information about public meetings, review of documents and the planning process. The following locations may be utilized to display information:

Public Libraries	U.S. Post Offices
County Court Houses	City Halls
Local Community Centers	Meeting Halls
Churches	Chambers of Commerce
KYTC Highway District Office	Area Development District
Schools	Public Housing Authorities
Senior Citizens Centers/Housing	Malls & Shopping Centers
Special Event Locations	Historical Societies
Local Museums	Other Identified Locations through Planning Process

## **APPENDIX E**

### **Language Assistance Plan**

#### **I. Introduction**

PEADD provides planning services in the Pennyryle Region of Eastern Kentucky. The Language Assistance Plan (LAP) has been prepared to address PEADD's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the PEADD service area there are 219,305 residents with 0.49 percent that speak a language other than English or who describe themselves as not able to communicate in English very well (Source: US Census). PEADD is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. PEADD has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Hand-book for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

#### **II. Four Factor Analysis**

The analysis provided in this report has been developed to identify LEP population that may use PEADD services and identify needs for language assistance. This analysis is based on the "Four Factor Analysis" presented in the Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a PEADD program, activity, or service.
2. The frequency with which LEP persons come in contact with PEADD programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by PEADD to the LEP population.
4. The resources available to the PEADD and overall cost to provide LEP assistance.

### Who is a Limited English Proficient Person?

Persons 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, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

**a. Factor 1: The number and proportion of LEP persons in the service area who may be served or are likely to encounter a PEADD program, activity, or service.**

The Pennyryle Area Development District is composed of eight counties: Caldwell, Christian, Crittenden, Hopkins, Livingston, Lyon, Muhlenberg, Todd, and Trigg. The PEADD is comprised of 5.05% of the state's population and according to census data is made up of 84% white, 11% Black, 1% Asian, 0.2% American Indian-Alaskan Native, and 3% Hispanic. The PEADD region is noted to have 0.49% of the population 5 years of age and older that speak English less than "very well". In addition, 1.31% of this population speaks a language other than English. The data has shown that the percentages of LEP in the area are low but are expected to increase over the next several years.

The table below shows the populations and data in each of PEADD's counties:

PEADD Area Population Statistics in 2010  
(Kentucky State Data Center)

County	Population	Caucasian	African American	American Indian	Asian	Hispanic
Caldwell	12,984	12,044	668	19	33	129
Christian	73,955	52,896	15,707	429	754	4,541
Crittenden	9,315	9,105	76	33	17	48
Hopkins	46,920	42,289	3,086	65	259	734
Livingston	9,519	9,318	21	27	20	123
Lyon	8,314	7,729	441	12	24	77
Muhlenberg	31,499	29,514	1,426	46	43	367
Todd	12,460	11,093	996	19	12	494
Trigg	14,339	12,781	1,171	38	44	175

**b. Factor 2: The frequency with which LEP persons come in contact with PEADD programs, activities, or services.**

It is expected that the number of foreign-born residents in Kentucky will continue to rise as well as an increase in the number of Spanish Speaking residents. PEADD will continue to monitor changes in demographics as they become available through Census and Studies. PEADD will also work closely with other agencies in the area for updated and available information.

PEADD will monitor the frequency with which LEP individuals come in contact with the program and services. PEADD will report all encounters with LEP persons through the Public Transit Reports and public participation documentation on an as needed basis. Reporting accuracy will improve with on-going training and tracking measures implemented. As of January 1, 2019, PEADD has had no re-quests from LEP individuals regarding Language Assistance. However, the PEADD will continue to monitor and track encounters with LEP persons.

**c. Factor 3: The nature and importance of programs, activities, or services provided by PEADD to the LEP population**

The purpose of the Area Development District (ADD) is to improve the quality of life in the Pennyrile region by promoting economic development to provide basic facilities essential to the stimulation of business, manufacturing, services, tourism and commercial activities; and through efforts promoting human resource development to improve health, welfare and education systems within the eight county area; and provide a forum for elected officials and citizens to reach a consensus and establish local-state-federal partnerships to seek a coordinated solution to problems. In addition, the PEADD (planning and service area) is designated as the Area Agency on Aging and is responsible for regional planning, coordination and advocacy on behalf of older persons.

PEADD is taking steps in order to increase outreach efforts to LEP language groups. For example, PEADD notes on our website and all advertisements and meeting notices that translation services and/or auxiliary aids are available upon request at no cost.

**d. Factor 4: The resources available to the recipient and costs**

Oral language services include bilingual Customer Service Representatives. Customer Service Representatives are available upon request to answer questions. In addition to these oral language services, several written language service is available.

Other language barriers may be resolved by using websites such as [www.freetranslation.com](http://www.freetranslation.com), [www.translate.google.com](http://www.translate.google.com), and [www.babelfish.yahoo.com](http://www.babelfish.yahoo.com) for assistance in translation.

These additional language assistance tools will be utilized to assist LEP individuals at no additional cost. The notice of "language assistance at no cost" will be added to our advertisements and website.

**III. Staff Training**

Part of PEADD's LEP plan is deciding what level of staff training is needed. It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP plan. Properly training staff is a key element in the effective implementation of the LEP plan. Staff is trained to recognize when an LEP person is in need of language assistance and respond by providing information in a format that the LEP person can understand.

**IV. Evaluation of the LEP Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services, and to update the LEP plan when appropriate.

## **V. Safe Harbor Provision**

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

PEADD service area does not have LEP populations, which qualify for the Safe Harbor Provision. As shown in Appendix H, PEADD does not have LEP groups, which speak English less than "very well" that exceed either 5.0% or 1,000 people. However, PEADD will provide good faith efforts to meet the needs of the LEP population if and when necessary.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. PEADD may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

**APPENDIX F**  
**Title VI Plan Adoption and Approval**

**Pennyrile Area Development District**  
**Title VI Plan Adoption and Approval**

The 2018 Title VI Plan has been approved and adopted by the Pennyrile Area Development District.

  
Executive Director

## **APPENDIX G**

### **SUMMARY OF ECONOMIC CONDITIONS**

#### **Data Collection/Reporting/Analysis**

Statistical data on race, color, national origin, sex, age, disability, and LEP of participants in and beneficiaries of the KYTC's programs, (i.e., affected populations, and participants) will be gathered, analyzed, and maintained by the Cabinet to determine the transportation investment benefits and burdens to the population, including minority and low-income populations. Each of the Cabinet's Program Areas will maintain data relative to their programs and activities. 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



SUMMARY OF ECONOMIC CONDITIONS

Population Size

The population growth patterns were analyzed from 1950 to 2010 as shown in *Table 1, Population of the Counties in the Pennyryle ADD*. The population of the Pennyryle region has increased over the past sixty (60) years. The counties with bigger cities have experienced larger population growth. There are four (4) counties that have experienced a slight population decrease within the last ten (10) years. They are Caldwell, Crittenden, Livingston and Muhlenberg counties. The decrease or slow growth in the Pennyryle rural populations tends to follow the national trend of people moving to more urban areas for employment. A sizable portion of Trigg and Lyon County's population increases are due to people who are retiring or are drawn to the quality of life of the community because of Lake Barkley and the Land Between the Lakes (LBL) Recreation Area.

**Table 1**  
**Population of the Counties in the Pennyryle ADD 1950 to 2010**

Area	1950	1960	1970	1980	1990	2000	2010
Pennyryle ADD	174,302	178,061	176,201	204,937	205,800	215,519	219,305
Caldwell	13,199	13,073	13,179	13,473	13,232	13,060	12,984
Christian	42,359	56,904	56,224	66,878	68,941	72,265	73,955
Crittenden	10,818	8,648	8,493	9,207	9,196	9,384	9,315
Hopkins	38,815	38,458	38,167	46,174	46,126	46,519	46,920
Livingston	7,184	7,029	7,596	9,219	9,062	9,804	9,519
Lyon	6,853	5,924	5,562	6,490	6,624	8,080	8,314
Muhlenberg	32,501	27,791	27,537	32,238	31,318	31,839	31,499
Todd	12,890	11,364	10,823	11,874	10,940	11,971	12,460
Trigg	9,683	8,870	8,620	9,384	10,361	12,597	14,339

Source: U.S. Census Bureau, Census of Population, 1950-2010

## COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGIES

Trigg County is the fastest growing county within the Pennyryle Area Development District with a growth rate of 13.8 percent over the last ten (10) years. Christian County is projected to be the third fastest growing county, which is currently the region's largest manufacturing center.

An understanding of the present population characteristics helps the community to determine the adequacy of existing land use patterns, economic arrangements, and community facilities in terms of meeting existing needs. Changes can also be made in projected population trends by significant changes in economic development strategies and proactive land use planning processes.

**Table 2**  
**Population Changes of Counties in Pennyryle ADD 2000 to 2010**

Area	2000	2010	Percentage Change
Pennyryle ADD	215,519	219,305	1.8%
Caldwell	13,060	12,984	(0.6)%
Christian	72,265	73,955	2.3%
Crittenden	9,384	9,315	(0.7)%
Hopkins	46,519	46,920	0.9%
Livingston	9,804	9,519	(2.9)%
Lyon	8,080	8,314	2.9%
Muhlenberg	31,839	31,499	(1.1)%
Todd	11,971	12,460	4.1%
Trigg	12,597	14,339	13.8%

*Source: US Census Bureau*



*New Trigg County, KY Resident*

## Population Composition and Age Distribution

The age composition of the Pennyryle ADD population underwent significant changes over the last decade as indicated in *Table 3, Pennyryle ADD Age Composition Changes, 2000-2010*. Following the trend throughout the United States, Pennyryle ADD residents are having fewer children, and therefore, the percentage of the population under 19 had a small increase over the last ten (10) years. On the other hand, the percentage of persons 65 years of age and over is increasing as the “baby boomer” generation reaches this age bracket. The percentage of persons over 65 years old also reflects the trend of people living longer and relocating to small rural towns upon retirement.

**Table 3**  
**Pennyryle ADD Age Composition Changes 2000 – 2010**

Age Group	2000 Population	2010 Population	% Changes 2000-2010
All Ages	215,519	227,474	5.5%
0-19	59,687	61,283	2.7%
20-64	126,537	135,291	6.9%
65+	29,295	30,900	5.5%

Source: Kentucky State Data Center



A.W. Watts Senior Center: Photo Provided by the KY New Era

# COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGIES

**Table 4**  
**Population By Race For Kentucky And Pennyrile ADD Counties (2010)**

Area	Total Population	White Alone		Black or African American Alone		American Indian & Alaska Native Alone		Asian Alone		Native Hawaiian & other Pacific Islander Alone		Two or More Races		Hispanic or Latino (any race)	
		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Kentucky	4,339,367	3,809,537	87.8	337,520	7.8	10,120	0.2	48,930	1.1	2,501	0.1	75,208	1.7	132,836	3.1
Pennyrile ADD	219,305	186,769	85.2	23,592	10.8	688	0.3	1,206	0.5	340	0.2	4,516	2.1	6,688	3.0
Caldwell	12,984	12,044	92.8	668	5.1	19	0.1	33	0.3	2	0	174	1.3	129	1.0
Christian	73,955	52,896	71.5	15,707	21.2	429	0.6	754	1.0	291	0.4	2,406	3.3	4,541	6.1
Crittenden	9,315	9,105	97.7	76	0.8	33	0.4	17	0.2	7	0.1	65	0.7	48	0.5
Hopkins	46,920	42,289	90.1	3,086	6.6	65	0.1	259	0.6	21	0	911	1.9	734	1.6
Livingston	9,519	9,318	97.9	21	0.2	27	0.3	20	0.2	6	0.1	105	1.1	123	1.3
Lyon	8,314	7,729	93.0	441	5.3	12	0.1	24	0.3	1	0	90	1.1	77	0.9
Muhlenberg	31,499	29,514	93.7	1,426	4.5	46	0.1	43	0.1	5	0	346	1.1	367	1.2
Todd	12,460	11,093	89.0	996	8.0	19	0.2	12	0.1	2	0	173	1.4	494	4.0
Trigg	14,339	12,781	89.1	1,171	8.2	38	0.3	44	0.3	5	0	246	1.7	175	1.2

Source: US Census Bureau and Kentucky State Data Center

## Economic Analysis

The following tables provide a quantitative look at the Pennyriple ADD economy in four ways: as a whole, in comparison with the state, in comparison with the other counties in the region, and broken into component parts. The tables display data regarding the labor force and employment trends of county residents, including data regarding poverty and median income trends.

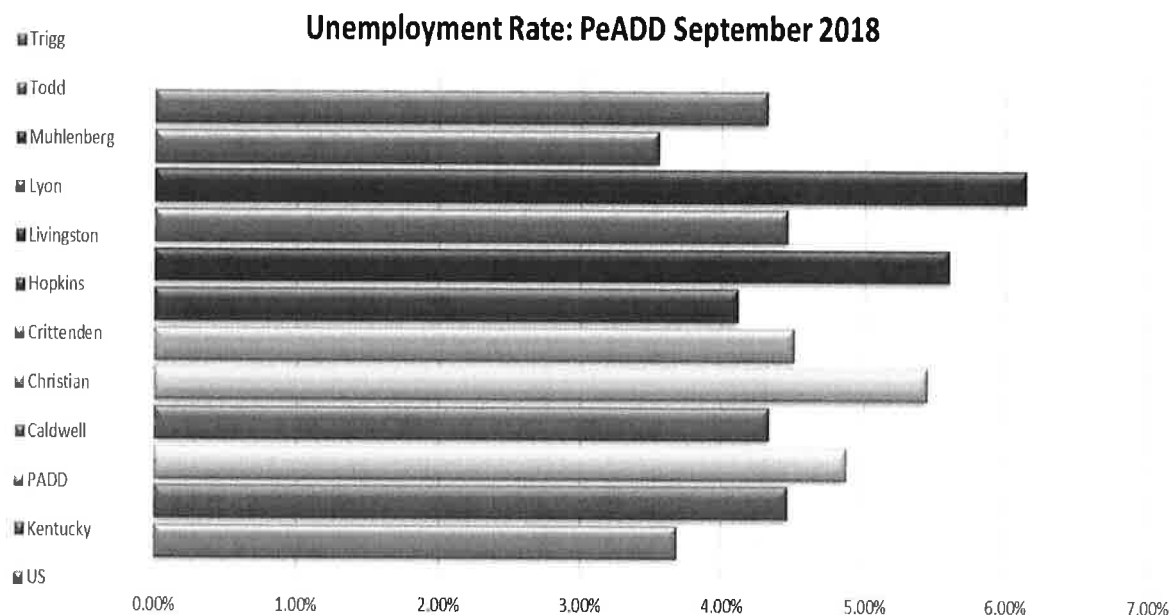
As indicated in *Table 5, Pennyriple ADD County Labor Force Characteristics*, the average unemployment rate for the Pennyriple ADD was 4.87 percent in August, 2018. The counties that had the two highest unemployment rates were Livingston County with an unemployment rate of 5.61 percent, and Muhlenberg County with 6.15 percent unemployment. Muhlenberg County's unemployment rate was 1.69 percent higher than the State's average during the same time period. Todd County had the lowest unemployment rate with 3.55 percent.

Four (4) counties in the Pennyriple ADD had a lower unemployment rate than the State for the same time period. Caldwell County had 4.33 percent, Hopkins County had 4.12 percent, Trigg County had 4.32 percent, and Todd County had a 3.55 percent unemployment rate.

**Table 5**  
**Pennyriple ADD Labor Force Characteristics: September 2018**

Area	Civilian Labor Force	Employment	Unemployment	Unemployment Rate
Kentucky	2,073,753	1,981,195	92,558	4.46%
PADD	82,950	78,911	4,039	4.87%
Caldwell	5,376	5,143	233	4.33%
Christian	25,434	24,050	1,384	5.44%
Crittenden	4,017	3,836	181	4.51%
Hopkins	19,465	18,664	801	4.12%
Livingston	3,657	3,452	205	5.61%
Lyon	3,138	2,998	140	4.46%
Muhlenberg	10,523	9,876	647	6.15%
Todd	5,460	5,266	194	3.55%
Trigg	5,880	5,626	254	4.32%

Source: KY Labor Market Information

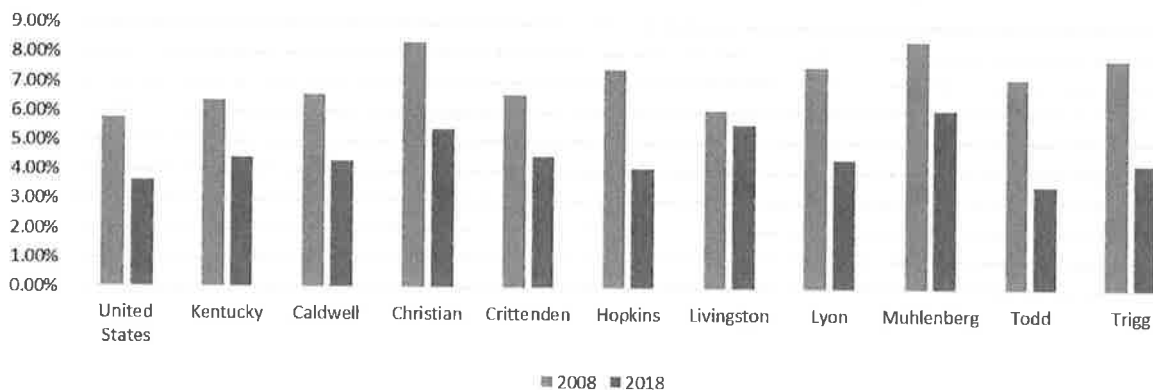


Source: KY Labor Market Information

The unemployment rates in most of the Pennyrile ADD counties have historically been higher than the State and National averages. As shown in *Table 6, Unemployment Rates: PADD Counties 2008 vs September 2018*, the September 2018 unemployment rates show that only one (1) of the nine (9) counties had a rate that was lower than the National rate of 3.7 percent, which is Todd County which had a 3.55 percent unemployment rate. Christian County has yet to recover from the plant closures and the resulting job losses in 2008-9, resulting in a higher unemployment rate than the State and National average. The 6.15 percent unemployment rate of Muhlenberg County is being affected by the decrease in coal production causing employment in the coal mining industry to decrease. The remaining counties range from a fraction of a percentage point above the national unemployment rate to Livingston County with an unemployment rate 2.14 percent higher than the Nation.

**Table 6**

**Unemployment Rates: PADD 2008 vs. September 2018**



Source: <http://thinkkentucky.com>, KY Labor Market Information, and Bureau of Labor Statistics

The unemployment rate of the counties in the Pennyriple region was compared to the unemployment rates at the start of the 2008/9 recession in *Table 7, Civilian Labor Force and Unemployment Estimates for Pennyriple ADD Counties, Annual Average 2008 and September 2018*. All nine (9) counties in the Pennyriple ADD region had their unemployment rates drop to rates that are lower than their 2008 unemployment rates.

Of the nine (9) counties in the Pennyriple region, six (6) of these counties have significant losses in their Civilian Labor Force from their 2008 levels. For example, Christian County's 2008 labor force was 28,973 persons, which decreased to 25,434 persons by September 2018. This is a reduction of 3,539 workers which is a 12 percent decrease from 2008 to September of 2018 of the Christian County Labor Force. This reduction can be attributed to some of the work force becoming retired, moving out of the county or in some way dropped out of the labor force. Livingston County had the largest percentage reduction of their Labor Force with 21 percent (1,060 workers) being lost from 2008 to September, 2018.

**Table 7**  
**Civilian Labor Force and Unemployment Estimates for Pennyryle ADD Counties,**  
**Annual Average 2008 and September 2018**

Area	Year	Civilian Labor Force	Employment	Unemployment	Unemployment Rate
Kentucky	2008	2,030,738	1,900,683	130,055	6.40%
	2018	2,073,753	1,981,195	92,558	4.46%
Caldwell	2008	6,661	6,225	436	6.55%
	2018	5,376	5,143	233	4.33%
Christian	2008	28,973	26,78	2,395	8.27%
	2018	25,434	24,050	1,384	5.44%
Crittenden	2008	4,026	3,763	263	6.53%
	2018	4,017	3,836	181	4.51%
Hopkins	2008	23,112	21,422	1,690	7.31%
	2018	19,465	18,664	801	4.12%
Livingston	2008	4,717	4,430	287	6.08%
	2018	3,657	3,452	205	5.61%
Lyon	2008	3,277	3,027	250	7.63%
	2018	3,138	2,998	140	4.46%
Muhlenberg	2008	13,098	11,979	1,119	8.54%
	2018	10,523	9,876	647	6.15%
Todd	2008	5,229	4,857	372	7.11%
	2018	5,460	5,266	194	3.55%
Trigg	2008	6,246	5,764	482	7.72%
	2018	5,880	5,626	254	4.32%

Todd County increased their labor force from 5,229 persons (2008) to 5,460 persons in September, 2018, while reducing their unemployment rate over the same time period from 7.11% (2008) to 3.55% (2018). Crittenden and Lyon counties had their Labor Forces remain relatively stable over the 2008 to 2018 time period.

An analysis of the income and poverty level within the Pennyryle ADD was conducted to compare the regional income to the State averages as indicated in *Table 8, Persons Living Below Poverty in the Pennyryle ADD: 2002 – 2016 (Estimated)* and *Table 9, Median Income in the Pennyryle ADD: 2002 – 2016 (Estimated)*. In the State of Kentucky, the poverty level had an increase of 31.28 percent in the fourteen (14) years between 2002 and 2016, while the median income had an increase of 29.9 percent over the same time period. Caldwell County had a 38.7 percent increase of persons living below poverty, the greatest increase within the Pennyryle region. During the same time period, the Caldwell County median income had an increase of 34.1 percent, which was higher than the change the State witnessed over the same time. Christian County also had a significant increase in their percentage of persons living below poverty during the same time period with a 34.1 percent increase.

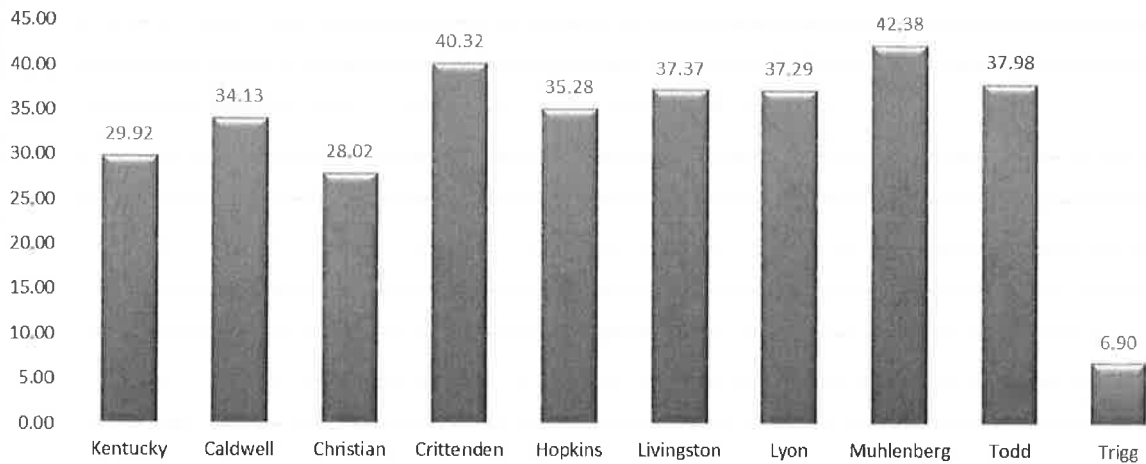


**Table 8**  
**Persons Living Below Poverty in the Pennyriple ADD: 2002 – 2016 (Estimated)**

Area	2002	2016	Percent Change 2002 -2015
Kentucky	596,255	782,779	31.28%
Caldwell	1,818	2,523	38.78%
Christian	10,393	13,938	34.11%
Crittenden	1,432	1,660	15.92%
Hopkins	6,898	8,154	18.21%
Livingston	1,204	1,329	10.38%
Lyon	959	1,152	20.13%
Muhlenberg	5,096	5,732	12.48%
Todd	2,030	2,457	21.03%
Trigg	1,547	2,046	32.26%

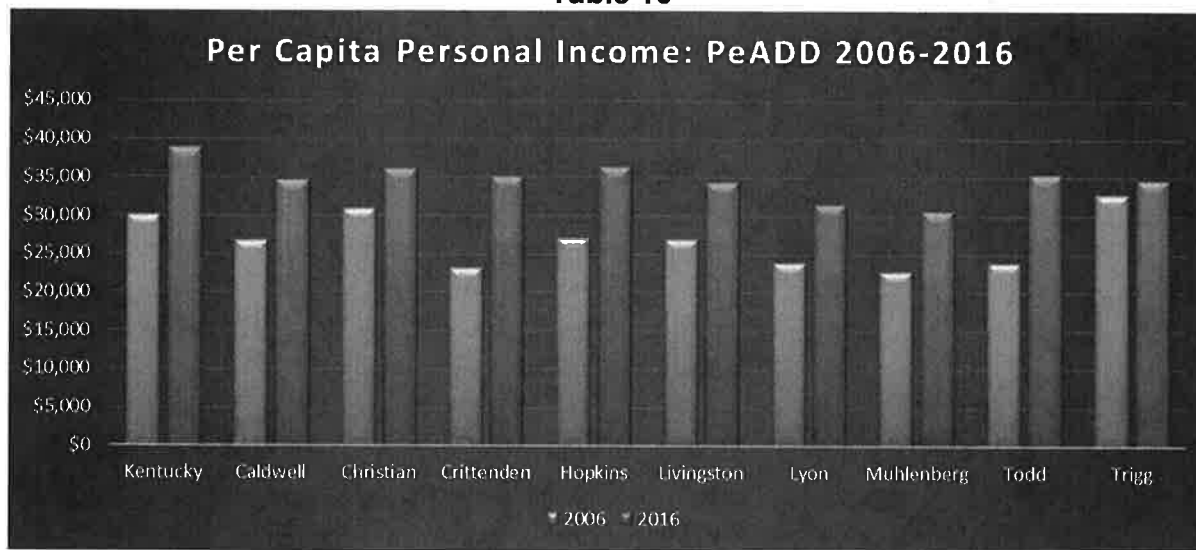
Source: US Census Bureau and Small Area Income and Poverty Estimates

**Table 9**  
**Median Income % Change 2002 - 2016**



Source: US Census Bureau and Small Area Income and Poverty Estimates

Table 10



Source: Bureau of Economic Analysis, US Department of Commerce

The data shows that Median and Per Capita income has increase in all of the PADD counties. However, the 20 percent of the population that makes the least amount of income has a disproportional benefit from the Median income increases.

# COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGIES

**Table 11**  
**Components of Personal Income For Pennyrile ADD Counties: 2016 (\$000)**

Area	Personal Income	Per Capita Income (4*)	Earnings by Place of Work	Contributions for Government Social Insurance (5*)	Adjustment for Residence (6*)	Net Earnings by Place of Residence	Dividends, Interest, and Rent (7*)	Personal Current Transfer Payments	Non-Farm Personal Income (1*)	Farm Income (2*)	Wage & Salary Disbursements	Proprietors' Income (8*)
Kentucky	\$172,713,808	\$38,926	\$119,705,491	\$14,447,108	-\$1,729,026	\$103,529,357	\$26,868,587	\$42,315,864	\$119,599,311	\$106,180	\$87,793,976	\$9,791,225
Caldwell	\$435,222	\$34,629	\$217,456	\$27,301	\$44,063	\$234,218	\$63,039	\$137,965	\$207,120	\$10,336	\$144,954	\$33,353
Christian	\$2,615,210	\$36,146	\$4,280,237	\$483,579	-\$2,336,208	\$1,460,450	\$557,439	\$597,321	\$4,286,007	-\$5,770	\$3,033,180	\$161,298
Crittenden	\$322,648	\$35,116	\$113,715	\$14,502	\$83,367	\$182,580	\$41,007	\$99,061	\$110,369	\$3,346	\$73,663	\$17,551
Hopkins	\$1,673,661	\$36,460	\$1,056,143	\$132,577	\$24,763	\$948,329	\$247,733	\$477,599	\$1,046,390	\$9,753	\$775,571	\$80,933
Livingston	\$319,251	\$34,443	\$157,936	\$21,441	\$33,364	\$169,859	\$43,910	\$105,482	\$162,049	-\$4,113	\$117,555	\$9,278
Lyon	\$254,654	\$31,560	\$115,163	\$14,397	\$19,605	\$120,371	\$43,989	\$90,294	\$117,149	-\$1,986	\$77,485	\$11,401
Muhlenberg	\$951,191	\$30,656	\$541,543	\$70,210	\$12,008	\$483,341	\$136,132	\$331,718	\$533,942	\$7,601	\$392,251	\$39,917
Todd	\$435,902	\$35,454	\$180,134	\$17,982	\$106,455	\$268,607	\$57,750	\$109,545	\$152,251	\$27,883	\$86,806	\$67,294
Trigg	\$493,991	\$34,632	\$156,803	\$21,927	\$134,557	\$269,433	\$77,633	\$146,925	\$159,558	-\$2,755	\$105,817	\$20,083

Source: Bureau of Economic Analysis, US Department of Commerce

1- Non-farm personal income is total personal income less farm income.

2 - Farm income is farm earnings less farm employer contributions for social insurance.

4 - Per capita personal income is total personal income divided by total midyear population.

5 - Contributions for government social insurance are included in earnings by type and industry, but they are excluded from personal income.

6 - The adjustment for residence is the net inflow of the earnings of inter-area commuters. For the United States, it consists of adjustments for border workers and US residents employed by international organizations and foreign embassies.

7 - Rental income of persons includes the capital consumption adjustment.

8 - Proprietors' income includes the inventory valuation adjustment and the capital consumption adjustment.