

Purchase Area Development District



Title VI Plan

Date Adopted: July __, 2014

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

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

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

The Purchase Area Development District (PADD) assures that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

PADD further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Develop a complaint process and attempt to resolve complaints of discrimination against PADD.
4. Participate in training offered on the Title VI and other nondiscrimination requirements.
5. If reviewed by any state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
6. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature

Jennifer Beck Walker
Executive Director

Date: July 21, 2014

2.0 Introduction & Description of Services

PADD 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.

PADD is a sub-recipient of FTA funds and provides service in the Kentucky Counties of Ballard, Calloway, Carlisle, Fulton, Graves, Hickman, Marshall & McCracken, also known as the Purchase Area.

Title VI Liaison

Pam Thompson Schmidt

Title VI Coordinator

270-251-6123

P.O. Box 588, 1002 Medical Drive, Mayfield, Kentucky 42066

PADD must designate a liaison 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.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- 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.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 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.

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

Current and Pending FTA Funding

1. FTA Section 5304, FY 2014, \$50,000 Federal + \$12,500 Local, Current
2. FTA Section 5304, FY 2015, \$50,000 Federal + \$12,500 Local, Pending

2.2 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.

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

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received KYTC concurrence on July 21, 2014. The Plan was approved and adopted by PADD's Board of Directors during a meeting held on July 21, 2014.

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 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 PADD'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 PADD's office including the reception desk and on the PADD's website at www.purchaseadd.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 he or she has been discriminated against on the basis of race, color or national origin by PADD may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix C). PADD investigates complaints received no more than 180 days after the alleged incident. PADD will process complaints that are complete.

Once the complaint is received, PADD 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.

PADD has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, PADD may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, PADD can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public at www.purchaseadd.org.

A copy of the complaint form in English and Spanish is provided in Appendix E and on PADD's website www.purchaseadd.org.

4.2 Record Retention and Reporting Policy

PADD'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 Contractors and Subcontractors

PADD 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. PADD 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, PADD 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 PADD, 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), PADD 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 PADD 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.

PADD 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 (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

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 PADD 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 PADD. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about PADD services and to provide a means for considering public comment. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

PADD 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 PADD's recent, current, and planned outreached activities.

- Each year the PADD conducts a Regional Public Transportation Coordination meeting which involves all public transportation providers serving the area. Over 160 transportation and social services agencies operating in the region are invited to discuss public transportation issues. For those unable to attend a hard copy survey can be completed to communicate transportation issues.
- Information regarding the availability of PADD services is listed on the agency's web site at www.purchaseadd.org.
- In addition each transit agency PADD works with posts information on their vehicles regarding rates, contact information for scheduling and service areas.
- Informational flyers are posted in each Transit Center.
- Information regarding services offered is posted on each agency's web site.
- Local elected officials are apprised of the services available so they can direct constituents to the proper service provider.

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).

PADD conducts regional planning within the Purchase Area of Western Kentucky. The Language Assistance Plan (LAP) has been prepared to address PADD'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 PADD service area there are 196,393 residents or 5.5 percent that speak a language other than English or who describe themselves as not able to communicate in English very well (Source: US Census). PADD 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.

Training

PADD staff reviews all FTA Circulars regarding Title VI issues as well as supplemental information provided by the KYTC Office of Transportation Delivery. Staff also participates in training conducted by the Kentucky Public Transit Association.

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.

PADD's service area does have LEP populations which qualify for the Safe Harbor Provision. According to the 2010 Census 5.5 percent of Purchase residents speak a language other than English.

8.0 Transit 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 PADD Board consists of 34 members appointed by the appropriate elected official.

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population	89.9%	2.5%	6.4%	0.75%	0.24%	0.21%
Transportation	88.0%	4.0%	8.0%	0.0%	0.0%	0.0%

PADD 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.

9.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B 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	PADD SERVICE AREA & DEMOGRAPHIC MAPS

Appendix A

General Reporting Requirements

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (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**Purchase Area Development District (PADD)**

- PADD 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 PADD.
- For more information on PADD's civil rights program, and the procedures to file a complaint, contact 270-247-7171, (TTY 7-1-1 or 800-648-6057); email pam.schmidt@purchaseadd.org visit our administrative office at 1002 Medical Drive, Mayfield, Kentucky 42066. For more information, visit www.purchaseadd.org .
- If information is needed in another language, contact 270-247-7171. Una versión traducida de este documento puede estar disponible a petición.

Appendix C

Title VI Complaint Form

Purchase Area Development District (PADD)

Title VI Complaint Form

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
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
Section III:			
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"/> Age
<input type="checkbox"/> Disability	<input type="checkbox"/> Family or Religious Status	<input type="checkbox"/> Other (explain) _____	
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. _____ _____			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No

Section V	
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:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

Signature Date

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

Pam Thompson-Schmidt
P.O. Box 588, 1002 Medical Drive
Mayfield, Kentucky 42066

Appendix D

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for PADD was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the regional public transportation decision making process.

Public Input

The Purchase Area Development District conducts an annual Public Transportation Project Coordination Meeting in conjunction with the Fulton County Transit Authority, Murray Calloway County Transit Authority and the Paducah Transit Authority. The purpose of this meeting is to get transportation system users together with transportation providers to discuss and hopefully resolve problems. In addition these sessions provide an effective means for the community to provide feedback on services which can in many cases be used to improve services. Efforts are made to involve a diverse group of individuals representing all segments of the region's population. Over 160 notices for this meeting are sent out by certified mail to regional transportation providers, social service agencies are notified via US Mail, an advertisement is placed in The Paducah Sun (the paper of largest regional circulation) and it is posted on each agency's web site. The three participating Transit Authorities also offer free transportation to this meeting with 24 hours advance notice. This meeting is conducted mid day and a light lunch is provided for the convenience of those attending. For those unable to attend a survey form is available for use in communicating transportation issues to the participating agencies. The meeting facility is fully ADA compliant and accommodations are made with non english speaking participants although a 48 hour notice is requested in order to have an interpreter on hand. These language services are provided through Murray State University's International Studies Department. A Google translation browser has been added to the PADD web site so that all posted information can be easily translated. Hearing impaired individuals may participate in this process through Kentucky Relay at 7-1-1. This free public service provides a communication link between standard telephone users and persons with an hearing or speech impairment.

Appendix E

Language Assistance Plan (LAP)

I. Introduction

PADD provides planning services in the Purchase Region of Western Kentucky. The Language Assistance Plan (LAP) has been prepared to address PADD'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 PADD service area there are 196,393 residents or 5.5 percent who describe themselves as not able to communicate in English "very well" (Source: US Census). PADD 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. PADD 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 Handbook 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 PADD 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:

Purpose

The purpose of the PADD Limited English Proficiency Plan is to ensure equal access to the services provided by the District. This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1A.

Service Area and Description

PADD serves the Kentucky Counties of Ballard, Calloway, Carlisle, Fulton, Graves, Hickman, Marshall and McCracken. The following LEP demographics for the PADD service area were obtained from the U.S. Census Bureau:

(1) The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Area Population

Ballard County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	7,772	100.0
English only	7,619	98.0
Language other than English	153	2.0
Speak English less than "very well"☐.	54	0.7
Spanish	93	1.2
Speak English less than "very well"☐.	45	0.6
Other Indo-European languages	33	0.4
Speak English less than "very well"☐.	7	0.1
Asian and Pacific Island languages.	24	0.3
Speak English less than "very well"☐.	2	–

Additional Community Information

The Ballard County Board of Education reports 1 of 1,300 students in need of English as a Second Language (ESL) program. Therefore Ballard County does not have an ESL program and provides training on an individual basis when needed.

The Ballard County Court Clerk estimates 4 LEP contacts annually.

The Ballard County Sheriff’s Department reports LEP encounters as very rare.

Calloway County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	32,511	100.0
English only	30,833	94.8
Language other than English	1,678	5.2
Speak English less than "very well"☐.	698	2.1
Spanish	780	2.4
Speak English less than "very well"☐.	282	0.9
Other Indo-European languages	512	1.6
Speak English less than "very well"☐.	188	0.6
Asian and Pacific Island languages.	301	0.9
Speak English less than "very well"☐.	205	0.6

Additional Community Information

Murray State University reports 475 persons enrolled in ESL classes with 100 of those individuals being considered LEP. The average over the last 10 years is 471 persons each year.

Calloway County Board of Education reports 13 of 3,000 students enrolled in their English Language Learner Program.

The Calloway County Sheriff’s Office estimates that they have one LEP contact per week. They employ two Spanish speaking Deputies that handle most translation duties. Murray State University translation services are utilized for all other languages.

Calloway County Court Clerk’s Office estimates 30-40 LEP contacts annually. Most of these individual bring an interpreter.

Carlisle County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	5,032	100.0
English only	4,997	99.3
Language other than English	35	0.7
Speak English less than "very well"☐.	14	0.3
Spanish	25	0.5
Speak English less than "very well"☐.	8	0.2
Other Indo-European languages	8	0.2
Speak English less than "very well"☐.	6	0.1
Asian and Pacific Island languages.	-	-
Speak English less than "very well"☐.	-	-

Additional Community Information

The Carlisle County Board of Education reports no ESL students.

The Carlisle County Court Clerk estimates that he has 1-2 transactions per week with LEP persons. He noted that these individuals routinely bring a person to help with translation.

Carlisle County Sheriff’s Department – response pending

Fulton County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	7,282	100.0
English only	7,122	97.8
Language other than English	160	2.2
Speak English less than "very well"☐.	13	0.2
Spanish	108	1.5
Speak English less than "very well"☐.	4	0.1
Other Indo-European languages	52	0.7
Speak English less than "very well"☐.	9	0.1
Asian and Pacific Island languages.	-	-
Speak English less than "very well"☐.	-	-

Additional Community Information

The Fulton County Sheriff’s Department has indicated that they have not had any contacts with LEP persons.

The City of Fulton School System has one LEP student.

Fulton County Transit Authority drivers report no LEP contacts.

Graves County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	34,584	100.0
English only	33,113	95.7
Language other than English	1,471	4.3
Speak English less than "very well"☐.	676	2.0
Spanish	936	2.7
Speak English less than "very well"☐.	547	1.6
Other Indo-European languages	390	1.1
Speak English less than "very well"☐.	104	0.3
Asian and Pacific Island languages.	134	0.4
Speak English less than "very well"☐.	25	0.1

Additional Community Information

The Graves County Sheriff’s Department does not track LEP encounters.

The Graves County Board of Education reports 98 of 4,900 (2%) students enrolled in English as a Second Language classes.

The Graves County Health Department reports 6% of their clients as Hispanic with limited English speaking capability.

The Graves County Court Clerk estimates that of an average of 200 daily transactions 10% are LEP individuals.

The Graves County Circuit Clerk estimates that less than 10% of persons served are LEP.

The Mayfield Board of Education reports 213 of 1,400 (15%) students enrolled in their English as a Second Language program.

Mayfield Dispatch estimates that 10-15% of calls received within a 24 hour period are from the LEP public.

The Mayfield City Clerk reports minimal contact with LEP customers.

Hickman County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	4,985	100.0
English only	4,910	98.5
Language other than English	75	1.5
Speak English less than "very well"☐.	40	0.8
Spanish	40	0.8
Speak English less than "very well"☐.	20	0.4
Other Indo-European languages	21	0.4
Speak English less than "very well"☐.	16	0.3
Asian and Pacific Island languages.	14	0.3
Speak English less than "very well"☐.	4	0.1

Additional Community Information

The Hickman County Board of Education no students in need of English as a Second Language Program.

The Hickman County Court Clerk reported contact with individuals having limited English approximately 3-4 times per year.

The Hickman County Sheriff’s Department reports zero encounters with Limited English speaking abilities.

Marshall County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	28,535	100.0
English only	28,039	98.3
Language other than English	496	1.7
Speak English less than "very well"☐.	269	0.9
Spanish	246	0.9
Speak English less than "very well"☐.	138	0.5
Other Indo-European languages	153	0.5
Speak English less than "very well"☐.	79	0.3
Asian and Pacific Island languages.	85	0.3
Speak English less than "very well"☐.	46	0.2

Additional Community Information

The Marshall County Board of Education reports zero students with limited English skills. The Board does have an interpreter on staff which has been utilized with Exchange Students.

Marshall County Sheriff’s Department indicates that LEP contacts are very rare. The Sheriff’s Department employs one person that is fluent in Spanish and has made arrangements with Murray State University for additional translation services if needed.

Marshall County Court Clerk’s Office estimates 2 LEP contacts annually.

McCracken County

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	61,594	100.0
English only	60,193	97.7
Language other than English	1,401	2.3
Speak English less than "very well"☐.	415	0.7
Spanish	839	1.4
Speak English less than "very well"☐.	282	0.5
Other Indo-European languages	412	0.7
Speak English less than "very well"☐.	92	0.1
Asian and Pacific Island languages.	123	0.2
Speak English less than "very well"☐.	41	0.1

Additional Community Information

The McCracken County Sheriff’s Department encounters very few LEP individuals and has had zero requests for transportation from LEP persons.

The Paducah Police Department reports no transportation issues with LEP persons.

The McCracken County Health Department reports contacts with Spanish, Chinese and Japanese speaking individuals however these clients represent a very small percentage of the persons served. None of the LEP individuals served have requested transportation.

Paducah Transit Authority drivers reported no LEP requests for transportation.

Purchase Region

	Number	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	182,295	100.0
English only	176,826	96.9

Additional Community Information

Kentucky State Police Post 1 Dispatch reports approximately 4-6 LEP contacts each month.

The Purchase Area Development District has never received a LEP request for direct transportation services, coordination services or technical assistance.

Source: <http://ksdc.louisville.edu/>

Table DP-2. Profile of Selected Social Characteristics: 2000

(2) The Frequency with which LEP Individuals Come in Contact with the Program, Activity or Service

The PADD has not had any LEP individuals participate in transportation planning activities or request assistance in arranging transportation.

PADD will log and date all LEP requests for service. Subsequently translation services will be provided at no cost to the individual. Staff is prepared to arrange for translation services when requested.

(3) The Nature and Importance of the Program, Activity, or Service Provided by the Program

The PADD provides transportation planning and public transportation coordination services for the Kentucky Counties of Ballard, Calloway, Carlisle, Fulton, Graves, Hickman, Marshall and McCracken Counties. All transportation providers and social service agencies in the area will be advised that translation services are available at no charge to LEP individuals.

(4) The Resources Available to the Recipient and Costs

The following services are available at no charge.

www.freetranslation.com is used to translate Transportation Committee agendas and other documents as necessary.

Spanish is the second most common language in the region so a person fluent in Spanish serves on the Transportation Committee.

With adequate notice PADD will use Murray State University's International Studies Department interpreters to provide information in other languages. The ESL contact person is Kara Hussman and she may be contacted at 270/809-2263. An alternate contact for translation services is Vince Medlocke and he can be reached at 270/293-8315.

Services are also available through the Kentucky Translator and Interpreter Association (KTIA) Contact: Aida Juric, ajuric@archlou.org

The University of Tennessee Martin provides a third translation option through their Office of International Affairs. The contact person is Ms. Lori Jackson and she can be contacted at 731/881-3582. Dr. Nappo is the Chair of the Department of International

Education/Global Studies and he can be reached at 731/881-7420.

The US Census 2000 Language Identification Flashcard is available to assist staff in assessing LEP needs

A Google Translation Browser has been added to the PADD web site so all posted documents are available in multiple languages.

The PART web site also includes a Google Translation Browser.

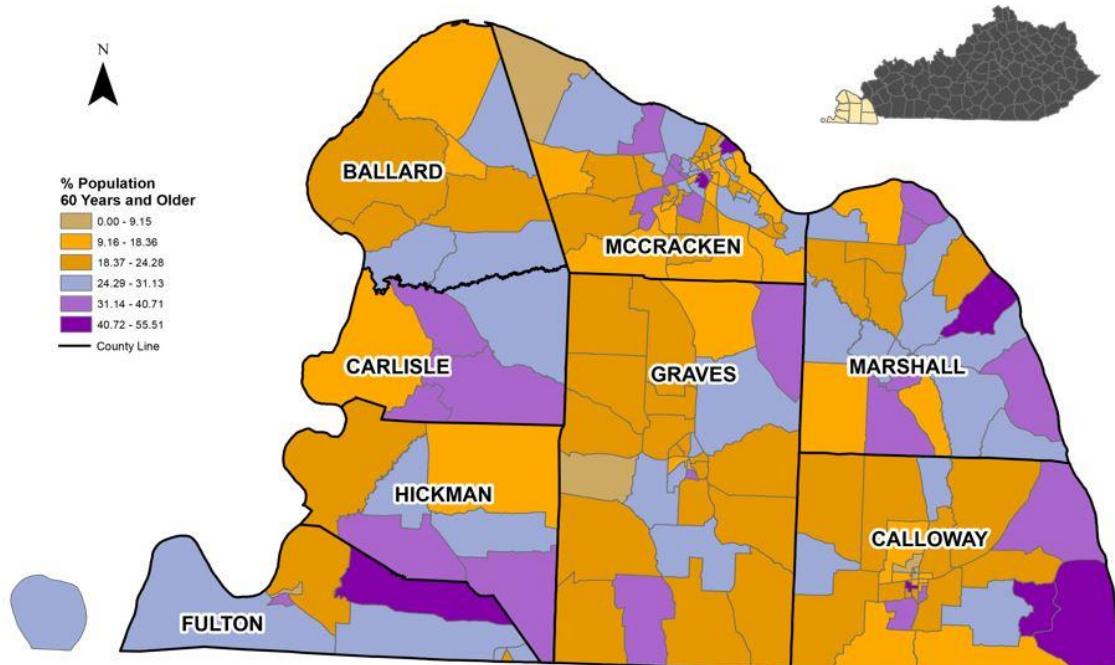
PADD will track LEP encounters and modify the existing process to meet the needs of the service area as necessary.

Appendix F

PADD Service Area & Demographic Maps



Purchase Area Development District Percent Population Age 60 Years and Older

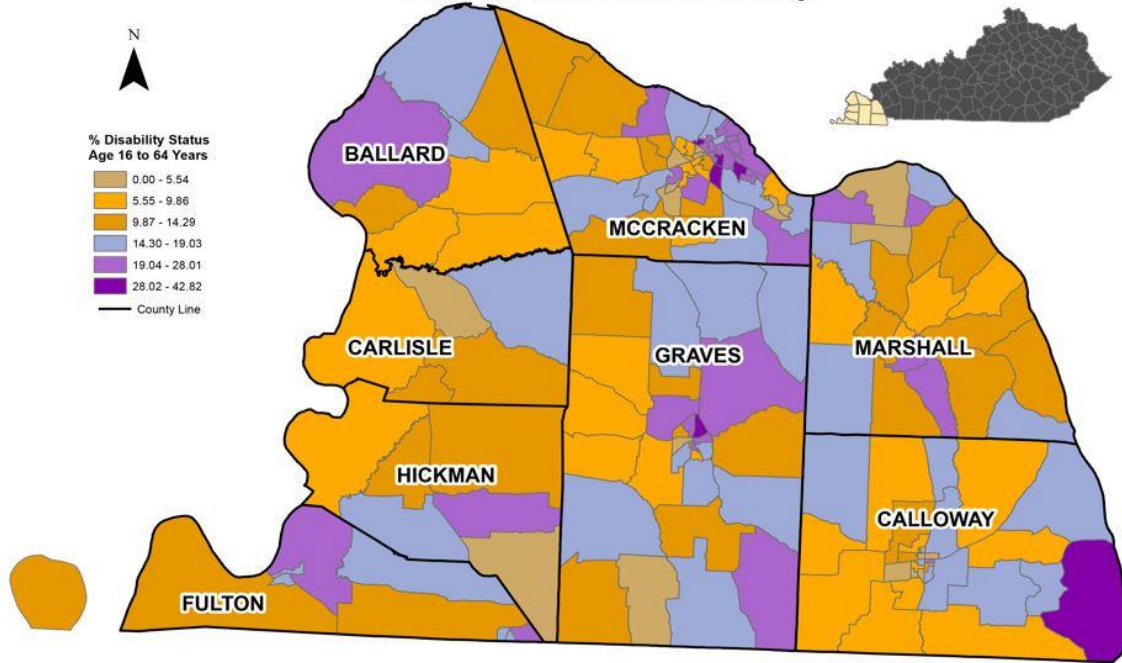


Source: Kentucky State Data Center
Census 2010 American Community Survey 5 Year Data (2008-2012)
Table B01001 - Sex by Age

This map was produced in cooperation with the Kentucky Transportation Cabinet



Purchase Area Development District Percent Disability Status Age 16 to 64 Years Census Tract Block Group



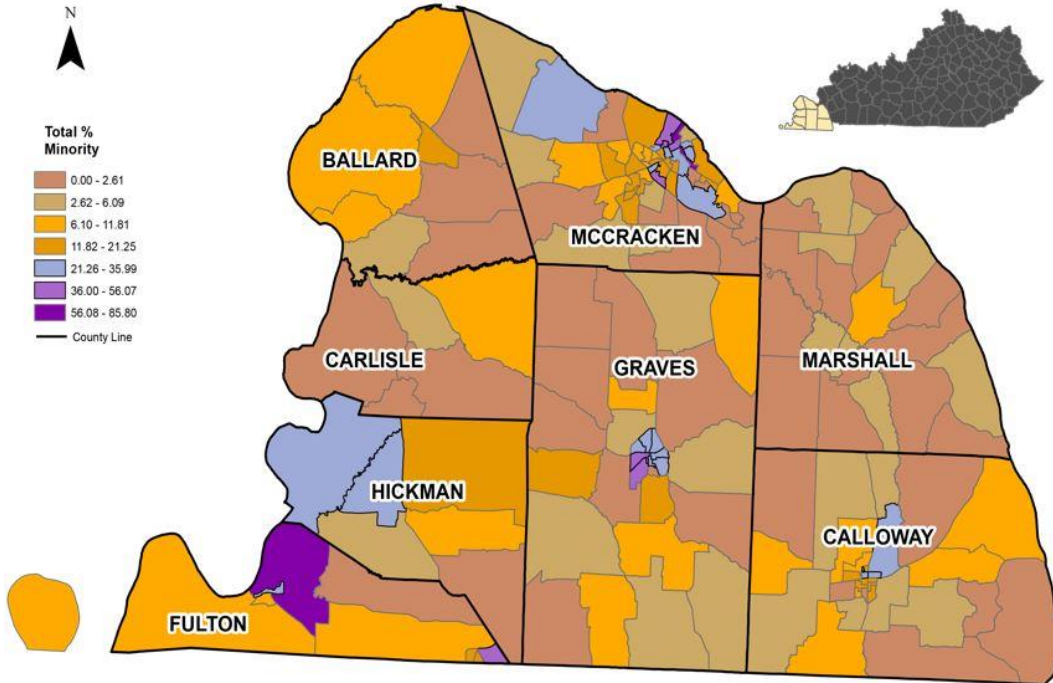
Source: Kentucky State Data Center
Census 2010 American Community Survey 5 Year Data (2008-2012)
Table C23023 - Sex by Disability Status by 12 months for the population 16 to 64 Years

This map was produced in cooperation
With the Kentucky Transportation Cabinet



Purchase Area Development District

Percent Minority Population by Census Tract Block Group



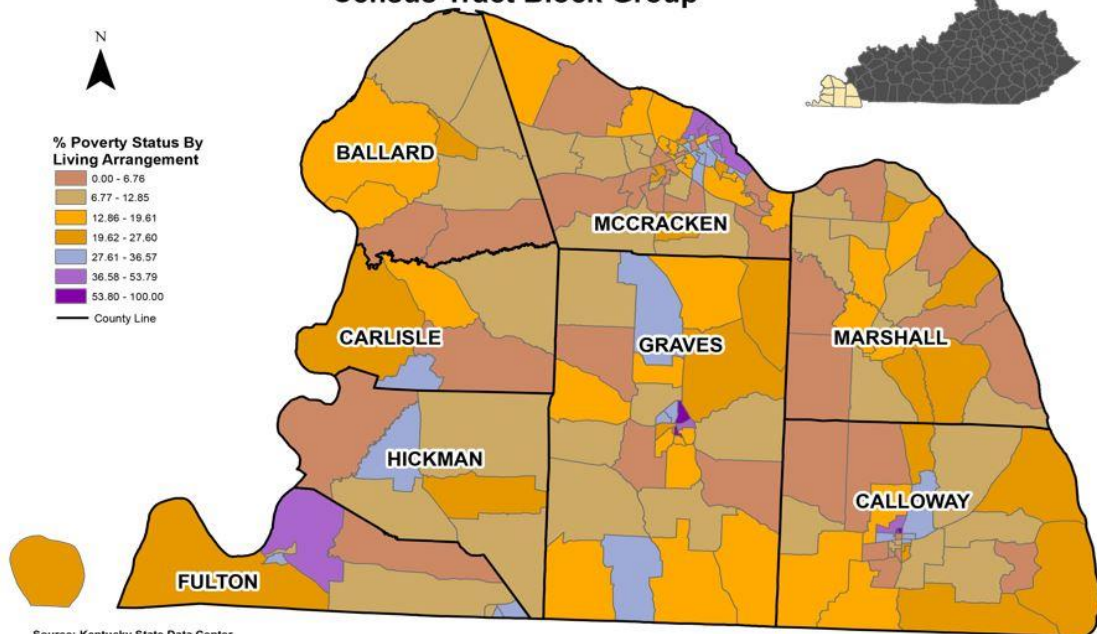
Source: Kentucky State Data Center
 Census 2010 American Community Survey 5 Year Data (2008-2012)
 Table B03002 - Hispanic or Latino Origin by Race

This map was produced in cooperation
 with the Kentucky Transportation Cabinet



Purchase Area Development District

Percent Poverty Status Of Individuals by Living Arrangement Census Tract Block Group



Source: Kentucky State Data Center
Census 2010 American Community Survey 5-Year Data (2008-2012)
Arrangement with the Kentucky Transportation Cabinet

This map was produced in cooperation with the Kentucky Transportation Cabinet Table B17021 - Poverty Status of Individuals in the Past 12 Months by Living