

FINANCE AND ADMINISTRATION CABINET

Office of the Secretary
Office of Public Information
Office of General Counsel
Office of the Controller
Office of Equal Employment Opportunity and Contract Compliance
Office of Administrative Services
Commonwealth Office of Technology
Department for Facilities and Support Services
Department of Revenue



**Commonwealth of Kentucky
FINANCE AND ADMINISTRATION CABINET
OFFICE OF EEO AND CONTRACT COMPLIANCE**

STEVEN L. BESHEAR
Governor

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LORI H. FLANERY
Secretary

YVETTE M. SMITH
Executive Director

July 1, 2011

Mr. Justin Ebert
Auditor of Public Accounts
209 St. Clair Street
Frankfort, KY 40601-1817

Dear Mr. Ebert:

In accordance with statutory requirements pertaining to Title VI of the Civil Rights Act of 1964, the Finance and Administration Cabinet (Cabinet) submits this Annual Update. The Cabinet, its attached agencies and their sub-recipients, and all parties involved shall comply with the provision of Title VI and KRS 344.015 and have been duly notified about their compliance responsibilities. The Cabinet requires agencies to submit narrative updates, compliance status reports and self-surveys annually. These documents are maintained in the Cabinet's Office of EEO and Contract Compliance.

If you have any questions about the enclosed Update, Plan Update form, or Compliance Status Report, please contact me at 502-564-2874 or Yvette.Smith@ky.gov.

Sincerely,

A handwritten signature in blue ink that reads "Yvette M. Smith".

Yvette M. Smith
Executive Director

A handwritten signature in blue ink that reads "Yvette M. Smith" with a small "ky" written above it.

Enclosures (3)

1. Title VI Plan Update
2. Plan Update Form
3. Compliance Status Report

**Auditor of Public Accounts
Title VI of the Federal Civil Rights Act
Implementation
“Initial Plan and “Plan Update” Form”**

Initial Plan

Plan Update

AGENCY: Finance and Administration Cabinet

DATE: June 30, 2011

Pursuant to KRS 344.015 and Section 2 of 45 KAR 1:080, state agencies receiving federal funds shall prepare and submit an annual Title VI plan update to the Auditor of Public Accounts and the Kentucky Commission on Human Rights by July 1, 1995 and by July 1 each year thereafter. Please complete the following information when submitting annual plan updates.

Check the corresponding sections of the plan that the agency is:

(1) Required to update; and/or

(2) Amending.

Please include the updated wording under the applicable sections listed below in your Plan Update.

The following sections are required to be updated annually: (6), (7), (9), (10), (12) and (13). Please attach a Plan Update detailing updates or changes from the prior year Plan – do not submit your entire plan once it is on file with the Auditor’s Office.

(1) Glossary/Definitions

(2) Overview

(3) Scope Of Title VI Applicability To Programs And Activities

(4) Responsible Official

(5) Statement Of Assurance

(6) Identify Programs Or Activities Subject To Title VI

(7) Complaint Procedures

(8) Compliance/Noncompliance Reporting

(9) Agency Training Plan

(10) Evaluation Procedures Of Title VI Plan

(11) Public Notice And Outreach

(12) Recordkeeping And Reporting

(13) Minority Representation On Planning Board Or Advisory Body

NOTE: This form **DOES NOT** substitute for the actual **update** that may need to be completed.

Title VI Compliance Status Report
Finance and Administration Cabinet
(July 1, 2010 - June 30, 2011)

	<u>Yes</u>	<u>No</u>
1. Services from this facility are provided to clients without regard to race, color, or national origin.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. An employee has been appointed to serve as Title VI Coordinator for this agency.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Minorities are represented on the advisory board if at least 5% of the population in the geographic service area are minority persons.	<input checked="" type="checkbox"/> **	<input type="checkbox"/>
4. A written procedure exists for hearing and reviewing Title VI complaints.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Records are maintained regarding all alleged cases of discrimination.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Title VI posters (where possible) are prominently displayed and used to emphasize the Title VI program and complaint opportunities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. New employees are clearly informed about their responsibilities to clients under Title VI.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Contracts between this agency and another party include the formal Title VI "Statement of Compliance" clause.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Other parties which contract with this agency are clearly informed by this agency about their own responsibilities to clients under Title VI standards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. All physical facilities and physical areas are made available to every client without regard to race, color, or national origin.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

NOTE: This form DOES NOT substitute for the **actual update** that may need to be completed.

****The KHEAA/KHESLC Board of Directors and the Green Bank of Kentucky Program Executive Advisory Committee do not currently reflect minority membership. Green Bank membership is determined by Administrative Order and members serve by virtue of office or position held; KHEAA/KHESLC Board members are appointed by the Governor or serve by virtue of office or position held.**

II. Overview

Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations require all state agencies that receive federal financial assistance to develop and implement plans to ensure that no one receiving benefits under a federally funded program is discriminated against on the basis of race, color or national origin. Senate Bill 248, passed by the 1994 Kentucky General Assembly, requires state agencies to “develop a Title VI implementation plan by January 1, 1995.” Due to its recent reorganization in July 2004, the Finance and Administration Cabinet (Cabinet) herewith submits a new Title VI Implementation Plan.

This Implementation Plan defines the Finance and Administration Cabinet’s approach to assuring Title VI compliance and to documenting responses to discrimination complaints.

The Kentucky Finance and Administration Cabinet is responsible for the construction of state facilities, property management, expenditure control, state purchasing and postal and printing services. We provide the administrative support and the facilities to enable agencies to provide the access to government that the public needs and deserves.

The Finance and Administration Cabinet is comprised of the following nine offices and departments:

- Office of the Secretary
- Office of Public Information
- Office of General Counsel
- Office of the Controller
- Office of Equal Employment Opportunity and Contract Compliance
- Office of Administrative Services
- Commonwealth Office of Technology
- Department for Facilities and Support Services
- Department of Revenue

Two of these offices and departments receive federal funds. They are as follows:

1. ***Department of Revenue.*** The Cabinet’s Department of Revenue is the statutory agency of state government responsible for the administration and enforcement of all state revenue laws and for the assessment and collection of state taxes. Its mission is to provide courteous, accurate and efficient services for the benefit of Kentucky and its citizens, and administer the tax laws of the Commonwealth in a fair and impartial manner.
2. ***Commonwealth Office of Technology.*** The Commonwealth Office of Technology employees provide the leadership, policy direction and technical support to all executive branch agencies of state government in the application of information technology and the delivery of information services. Its goal is to transform the Commonwealth’s use of information technology (IT) to improve the efficiency of state government and our delivery of services. It hopes to meet these goals by: taking an enterprise approach to IT; offering IT as a service or utility to state government agencies; establishing enterprise

standards and architecture; promoting technology in Kentucky's educational systems; and helping to keep and attract high-tech companies to Kentucky.

In addition to the offices and departments, there are ten (10) agencies administratively attached to the Finance and Administration Cabinet. An overview of each agency follows. Please note that the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority (KHEAA), and Kentucky Higher Education Student Loan Corporation (KHESLC) are the only agencies that receive federal funds.

1. **Kentucky Housing Corporation.** Kentucky Housing Corporation (KHC), created by the 1972 General Assembly, is a self-supporting, public corporation of the Commonwealth of Kentucky administratively attached to the Finance and Administration Cabinet. A portion of KHC's funds are derived from the interest earned through the sale of tax-exempt mortgage revenue bonds. From these proceeds, KHC has made homeownership possible for more than 82,000 Kentucky families. KHC also operates through the receipt of fees for administering federal programs including rental assistance that makes safe, decent, affordable housing available to more than 27,000 low-income Kentuckians. Other programs offered by KHC include rental housing production financing, homeownership education/counseling and a variety of rental assistance, housing rehabilitation and home repair initiatives. KHC works with many partners across the state, including lenders, government agencies, nonprofit housing providers, builders, real estate agents, community organizations and developers, to create affordable housing opportunities through an array of programs and services.
2. **Kentucky Higher Education Assistance Authority.** The Kentucky Higher Education Assistance Authority (KHEAA) is a public corporation and governmental agency and instrumentality of the Commonwealth established in 1966 to improve students' access to higher education. To that end, KHEAA administers several financial aid programs and disseminates information about higher education opportunities.
3. **The Kentucky Higher Education Student Loan Corporation.** The Kentucky Higher Education Student Loan Corporation (KHESLC) The Kentucky General Assembly created The Student Loan People in 1978 as an independent municipal corporation to make, finance, service, and collect educational loans. Our mission is to promote higher education opportunities by providing the lowest cost loan programs and related services.
4. **Turnpike Authority of Kentucky.** The Turnpike Authority of Kentucky is an independent corporate agency and instrumentality of the Commonwealth under KRS 175.410 through 175.990. The Authority was established to provide a method for the construction and financing of turnpikes and has since been revised to include Resource Recovery and Economic Development Roads.
5. **Commonwealth Credit Union.** The Commonwealth Credit Union (CCU) is a cooperative, not-for-profit financial institution owned and operated by its members exclusively to meet their financial needs. Currently, over 84,000 people from across Kentucky, and around the world, are CCU members.

6. ***School Facilities Construction Commission.*** The School Facilities Construction Commission (SFCC) assists local school districts with school facility construction and technology funding. It is responsible for distribution of available state funds to eligible districts certified by the State Board of Education. SFCC is empowered to issue bonds in its name and enter lease agreements with local boards of education to finance construction of new facilities and major renovation of existing facilities. SFCC is responsible for the allocation of the General Assembly appropriations for the financing of construction and implementation of technology on a timely and objective basis. The SFCC assists local school districts in conducting the sale of bonds and assuring timely and accurate debt service payments. Furthermore, it ensures that local school districts receive and match the state contributions in the area of technology.
7. ***Kentucky River Authority.*** The Kentucky River Authority is responsible for maintaining the 14 lock and dam structures on the Kentucky River. These structures were constructed by the United States Army Corps of Engineers for navigation purposes but are now only used for recreational boating and water supply. The Authority is charged with developing comprehensive plans for the management of the Kentucky River Basin, including long-range water supply, drought response and ground water protection plans. It is to adopt regulations to improve and coordinate water resource activities within the basin among state agencies. It is also charged to develop recreational areas within the basin.
8. ***Kentucky Executive Branch Ethics Commission.*** The Executive Branch Code of Ethics created by KRS Chapter 11A, effective July 14, 1992, establishes the ethical standards that govern the conduct of all executive branch employees. The code of ethics was enacted to promote public confidence in the government of the Commonwealth and its employees. The Kentucky Executive Branch Ethics Commission, authorized by KRS 11A.060, is an independent agency of the Commonwealth which has been given the responsibility of administering and enforcing the provisions of the code of ethics. The mission of the Kentucky Executive Branch Ethics Commission is to promote the ethical conduct of elected officials, officers and other employees in the executive branch of state government.
9. ***Kentucky Teachers' Retirement System.*** KTRS is classified as an "actuarial reserve, joint-contributory" system, meaning that contributions from members and employers and the earnings from KTRS investments are placed in reserve to pay for the System's annuity obligation. KTRS administration is the responsibility of the Board of Trustees consisting of nine (9) members. The Board of Trustees appoints an Executive Secretary who is responsible for administering KTRS under the policies established by the Board.
10. ***Kentucky Gas Pipeline Authority.*** The Kentucky Gas Pipeline Authority was created pursuant to KRS. 353.750 to provide a financing mechanism for the construction, reconstruction, improvement, or repair of any gas pipeline or appurtenant facilities.

IV. Responsible Official

The overall responsibility for complying with the provisions of Title VI is vested in the Secretary of Finance, Lori H. Flanery, who is responsible for administration of all programs and activities under the direction and management of the Finance and Administration Cabinet.

The responsibility for coordinating compliance with Title VI and this Implementation Plan are assigned to the Title VI Coordinator. Duties associated with this responsibility include, but are not limited to, the following:

- oversee implementation, compliance and monitoring;
- respond to complaints in the manner prescribed by the Implementation Plan;
- develop Title VI policy and procedure; and
- coordinate submission of annual updates.

Title VI Compliance Officers are responsible for coordinating compliance within agencies attached to the Finance and Administration Cabinet. Their responsibilities include collecting pertinent data, handling complaints, and coordinating annual compliance reviews.

Inquiries related to compliance activities should be directed to the Finance and Administration Cabinet's Title VI Coordinator:

Yvette M. Smith
Executive Director
Finance and Administration Cabinet
Office of Equal Employment Opportunity and Contract Compliance
702 Capitol Avenue
Capitol Annex, Room 395
Frankfort, KY 40601
Yvette.Smith@ky.gov
Telephone: 502-564-2874
Facsimile: 502-564-1055

Inquiries related to compliance activities by the Kentucky Housing Corporation should be directed to the agency's Title VI Compliance Officer:

Toni Smith
Fair Housing Trainer and Outreach Coordinator
Kentucky Housing Corporation
1231 Louisville Road
Frankfort, KY 40601-6191
tsmith@kyhousing.org
Telephone: 502-564-7630, extension 440

Inquiries related to compliance activities by the Kentucky Higher Education Assistance Authority (KHEAA) should be directed to the agency's Title VI Compliance Officer:

Melissa F. Justice, Esq.
Senior Associate Counsel
Kentucky Higher Education Assistance Authority
100 Airport Road
Frankfort, KY 40601
mjustice@kheaa.com
Telephone: 502-696-7309

Inquiries related to compliance activities by the Kentucky Higher Education Student Loan Corporation (KHESLC) should be directed to the agency's Title VI Compliance Officer:

Linda Sewell
Vice President, Human Resources
Kentucky Higher Education Student Loan Corporation
10180 Line Station Road
Louisville, KY 40223
lsewell@kheslc.com
Telephone: 502-329-7155

VI. Programs or Activities Subject to Title VI

This section includes a description of each program or activity under the Finance and Administration Cabinet, its administratively attached agencies and sub-recipients. In addition, this section includes a description of Limited English Proficiency activities.

Office of the Secretary

Funding for the following three (3) programs passes through the Energy and Environment Cabinet to the Finance and Administration Cabinet. As such the Finance and Administration Cabinet is a sub-recipient of the award. It should be noted that the Energy and Environment Cabinet will report on these programs in the future, rather than Finance, given that they are the primary recipient.

1. ***Green Bank of Kentucky Program.*** Funds for the Green Bank of Kentucky Program are provided through the American Recovery and Reinvestment Act (ARRA) by the U.S. Department of Energy (USDOE). The goal of the program is to reduce energy usage in state buildings.
2. ***Energy Management.*** Funds for the Energy Management program are provided through ARRA funds by the USDOE. The Finance Cabinet will measure the progress of energy performance savings through the use of software, hardware and equipment.
3. ***High Performance Building Staffing.*** Funds for the High Performance Building Staffing program are provided through ARRA funds by the U.S. Department of Energy. Funds will be used to cover the costs of employees working on energy conservation, efficiency, and energy management projects pertaining to state buildings.

Commonwealth Office of Technology

The following two (2) programs received funds during the 2010-2011 fiscal year:

1. ***American Recovery and Reinvestment Act – State Broadband Data and Development.*** The Commonwealth is working with grant funds under the State Broadband Data and Development Grant Program from the U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA). The grant is being used to create a state broadband map for Kentucky in accordance with NTIA program standards and compatibility with the existing Commonwealth Map. The Commonwealth is collecting comprehensive and verifiable broadband data that will be accessible and clearly presented to NTIA, the public, and state and local governments. In addition, a workable and sustainable framework for repeated updating of data will be implemented. A plan for collaboration with state level agencies, local authorities, and other constituencies, as well as a proposal for planning projects designed to identify and address broadband challenges in the state will be put into place. The Commonwealth is working with a mapping consultant to collect and verify broadband availability information from providers of broadband services. This information will be represented

graphically for the benefit of other government agencies and the general public. This project will serve to identify barriers to the adoption of broadband service and information technology services among all citizens, facilitate the creation of local planning teams including state and local leaders to develop regional ideas for broadband deployment and adoption by citizens and businesses and prioritization of project ideas to encourage use of broadband capabilities statewide, particularly focusing on adoption strategies that target vulnerable populations including individuals with limited English proficiency.

2. **2009 NSDI CAP Grant, Kentucky's Geospatial Strategic Plan.** Please note that the NSDI CAP Grant, Kentucky's Geospatial Strategic Plan Project, ended December 31, 2010. The Federal Geographic Data Committee (FGDC) is an interagency committee that promotes the coordinated development, use, sharing, and dissemination of geospatial data on a national basis. This nationwide data publishing effort is known as the National Spatial Data Infrastructure (NSDI) [Source: <http://www.fgdc.gov/>]. The NSDI Cooperative Agreements Program (CAP) is an annual program to assist the geospatial data community through funding and other resources in implementing the components of the NSDI. This program is open to State, local and Tribal governments, academia, commercial, and non-profit organizations. The program provides small seed grants to initiate sustainable ongoing NSDI implementations. The program emphasizes partnerships, collaboration and the leveraging of geospatial resources in achieving its goals (Source: <http://www.fgdc.gov/grants>). As part of the Fifty States Initiative, the NSDI CAP awards support the development and implementation of statewide strategies and business plans that will facilitate the coordination of programs, policies, technologies, and resources that enable the coordination, collection, documentation, discovery, distribution, exchange and maintenance of geospatial information in support of the NSDI.

Department of Revenue

The following two (2) programs received funds during the 2010-2011 fiscal year:

1. **IRS SPEC Partnership Tax Software.** Under an Internal Revenue Service Stakeholder Partnerships Education and Communication (IRS SPEC) partnership agreement, the IRS supplies tax software for the electronic filing of individual income tax returns. The Department of Revenue utilizes the software to provide free electronic filing to the taxpaying public. The free filing assistance is provided to taxpayers at the Department of Revenue's taxpayer service centers located in Ashland, Bowling Green, Corbin, Florence, Frankfort, Hopkinsville, Louisville, Owensboro, Paducah and Pikeville.
2. **Volunteer Income Tax Assistance.** In December 2007, Congress appropriated funds to the Internal Revenue Service (IRS) to establish and administer a matching grant program for community volunteer income tax assistance. This funding allowed the Stakeholder Partnerships, Education and Communication (SPEC) organization of IRS to provide grants to partner organizations to achieve the following program objectives:

- Enable the Volunteer Income Tax Assistance (VITA) Program to extend services to underserved populations in hardest-to-reach areas, both urban and non-urban;
- Increase the capacity to file returns electronically;
- Heighten quality control;
- Enhance training of volunteers; and
- Improve significantly the accuracy rate of returns prepared at VITA sites.

The VITA Program uses trained volunteers to prepare basic tax returns for low income taxpayers in both urban and non-urban locations including persons with disabilities, non-English speaking persons, elderly taxpayers, and Native Americans. For tax year 2009, individuals and families with an adjusted gross income of \$49,000 or lower were eligible for assistance through VITA. Because the VITA grant is in support of the VITA Program, grant recipients are required to follow existing guidance governing VITA site operations and to file all eligible returns electronically.’

Department of Revenue Field Operations staff—located at the ten (10) taxpayer service centers across the Commonwealth—are the “volunteers” for this program. (Source: <http://www.grants.gov/search/search.do?oppId=47474&flag2006=false&mode=VIEW>)

Kentucky Housing Corporation

The majority of the programs under KHC involve some type of application process either by an individual or local government, nonprofit, public agency or limited partnership. The following fifteen (15) programs received funds during the 2010-2011 fiscal year:

1. ***Housing Counseling Assistance Program for Foreclosure (Kentucky Homeownership Protection Center)***. The Kentucky Homeownership Protection Center was created to address the foreclosure crisis in Kentucky. This program, which is funded by the U.S. Department of Housing and Urban Development (HUD), provides a centralized location for information on public services to assist Kentuckians in keeping their homes. Homeowners can find information on the foreclosure process, utility assistance and home repair assistance to make choices and avoid losing their homes. The Kentucky Homeownership Protection Center is a joint effort of the Department of Financial Institutions, Kentucky Housing Corporation and other agencies across the state.
2. ***Homeless Prevention and Rapid Re-housing Program (KY Hearth)***. Kentucky’s Housing and Emergency Assistance Reaching the Homeless Program helps prevent individuals and families from becoming homeless; and, quickly re-houses and stabilizes individuals and families that are homeless. With the exception of similar programs in Lexington, Fayette County, Louisville, Jefferson County and Covington, KHC administers the program throughout the Commonwealth. KY Hearth is a HUD-funded program. Applications and services are provided on a first-come basis until all slots are

filled. To qualify for services, an applicant's income must be below 50% of the poverty level and the applicant must be homeless or be on the verge of homelessness. Homeowners may receive utility assistance, as well as services to stay in their homes. Guidelines are set through HUD regulations and KHC's Compliance Department monitors the progress of sub-recipients. Sub-recipients are statewide local non-profit service agencies and Local Government agencies.

3. ***Weatherization Assistance Program.*** The Weatherization Assistance Program, which is funded by the U.S. Department of Energy, provides services and benefits to low income households. The goal of the program is to improve the quality of life for young children and vulnerable adults by making their homes more energy efficient. Services include repair and replacement of heating systems, testing for gas leaks and carbon monoxide, installing insulation and energy education. KHC sub-contracts with Community Action Agencies across the state to provide the services. The Community Action Agencies maintain databases for tracking program progress. Eligible participants must be at and/or scaled on a 200% poverty level. Households with individuals who are elderly or who have disabilities, children, high energy users and those with a high energy burden are given first priority to participate in the program.
4. ***HOME Investment Partnership Program (HOME).*** The HOME Investment Partnership Act is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act (NAHA), Public Law 101-625. HOME is a formula based allocation program intended to support a wide variety of local affordable housing programs. HUD funds may be utilized for acquisition, new construction, reconstruction and moderate and substantial rehabilitation activities that promote affordable rental and ownership activities. HOME funds can also be used for tenant-based rental assistance. Eligible applicants include units of local government, public agencies, foundations, nonprofits, community housing development organizations and private developers. Applicants for funding are taken on an ongoing basis by the Center for Housing Construction and Finance. Potential beneficiaries include very low-and low income individuals.
5. ***Emergency Shelter Grant Program (ESG).*** The Emergency Shelter Grant Program is authorized under Title IV of the Stewart B. McKinley Homeless Assistance Act. Under the ESG Program, KHC may make grants to units of local governments and nonprofit organizations for the rehabilitation or conversion of buildings for use as emergency shelters for the homeless and for certain operating and social service expenses of the shelter. Potential beneficiaries include those individuals who meet the HUD definition of homeless as follows: an individual who lacks a fixed, regular and adequate nighttime residence and who has a primary nighttime residence that is a supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters and transitional housing for the mentally ill); an institution that provides a temporary residence for individuals intended to be institutionalized; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings. ESG is a HUD-funded program.
6. ***Supportive Housing Program.*** The Supportive Housing Program began as a demonstration program consisting of three parts: Transitional Housing, Permanent

Housing for Homeless Handicapped and Supplemental Assistance for Facilities to Assist the Homeless (SAFAH). The Housing and Community Development Act of 1992 consolidated the three parts into the Supportive Housing Program. The purpose of the program, which is funded by HUD, is to promote the development of housing with supportive services, including innovative approaches to assist the transition from homelessness to help homeless persons live independently. KHC is currently administering the SAFAH and Permanent Housing for Homeless Handicapped programs through the Specialized Housing Department. Potential program beneficiaries include homeless persons with disabilities seeking permanent housing.

7. ***Shelter Plus Care Program.*** The Shelter Plus Care Program provides rental housing assistance in connection with supportive services, which are funded from other sources, to homeless persons with disabilities, including their families. These disabilities primarily include serious mental illness, chronic drug or alcohol abuse, acquired immunodeficiency syndrome (AIDS) and related diseases. KHC is currently administering thirty-four (34) tenant-based rental assistance units through the Housing Choice Voucher Program in cooperation with the Kentucky River Area Development District in the following counties: Breathitt, Knott, Lee, Leslie, Letcher, Owsley, Perry and Wolfe. In addition, KHC serves as pass-through agency for funds that are administered by LifeSkills, Inc. Potential program beneficiaries include very low-income homeless persons with disabilities. The program is funded by the U.S. Department of Housing and Urban Development.
8. ***Housing Choice Voucher Program.*** The Housing Choice Voucher Program provides a rent subsidy to ensure that eligible tenants pay no more than thirty (30) percent of their monthly adjusted gross income for decent, safe and sanitary housing. To administer this program, KHC enters into contractual relationships with HUD, private owners and eligible beneficiaries. KHC provides housing assistance payments to the owner of the unit under lease by the eligible beneficiary. KHC maintains an open waiting list for rental assistance in counties where KHC has jurisdiction. The Housing Choice Voucher Program is administered by the Rental Assistance Programs Department. Potential program beneficiaries include very low-income singles, families, the elderly and persons with disabilities. The program is funded by HUD.
9. ***Rental Administration Program.*** KHC serves as contract administrator on behalf of HUD for the Rental Assistance Program. Rental Assistance funds flow from HUD through KHC to owners to help families pay for rent and utilities. Eligible tenants pay no more than thirty (30) percent of their monthly adjusted gross income for the Section 8 units. Individual apartment complexes maintain independent waiting lists. Potential program beneficiaries include very low-income singles, families, the elderly and persons with disabilities.
10. ***Section 8 Family Self-Sufficiency (FSS) Program.*** The purpose of the FSS Program is to promote the development of local strategies to coordinate the use of the Housing Choice Voucher Program with public and private resources and to enable families eligible to receive rental assistance under these programs to achieve economic independence and self-sufficiency. The objective of the FSS Program is to reduce the

dependency of low-income families on Welfare Assistance and Section 8 rental assistance. Under the FSS Program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing. This opportunity enables beneficiaries to obtain the education, employment, and business and social skills necessary to achieve self-sufficiency. The Planning and Program Development Department administers the FSS Program. Program beneficiaries include very low-income singles, families, the elderly and persons with disabilities. The FSS Program is funded by the U.S. Department of Housing and Urban Development.

11. ***Homeownership Counseling Program.*** The Homeownership Counseling Program offers a homeownership counseling curriculum and materials to counselors throughout the state. HUD provides funding for the program. KHC contracts with agencies and counselors to provide services to KHC-eligible prospective homebuyers that have been declined financing by KHC or a KHC-approved lender due to credit problems. In addition, graduates of the "Yes You Can... Own A Home" program that have credit issues or need additional counseling are eligible to participate in the program.
12. ***Housing Opportunities for Persons With AIDS (HOPWA).*** The HOPWA Program was authorized by the AIDS Housing Opportunity Act (AHOA) and amended by the Housing and Community Development Act of 1992. This HUD-funded program is designed to provide states and localities with resources and incentives for devising long-term comprehensive strategies for meeting the housing needs of persons with AIDS or related diseases and their families. Eligible recipients are low-income persons—eighty (80) percent or below of area median income—who are diagnosed with HIV/AIDS and their family members.
13. ***Kentucky Appalachian Housing Program.*** The Appalachian Regional Commission (ARC) is comprised of thirteen (13) Appalachian states. Governors from each state make up the Appalachian Board which sets priorities and reviews appropriations. The Appalachian Regional Commission awards grants and contracts from funds appropriated to the Commission annually by Congress. ARC funds can be used for transportation, water and sewer, health, education and housing initiatives. KHC administers the housing portion of activity in Kentucky under the Kentucky Appalachian Housing Program. Housing funds may be used for site improvements only and cannot exceed ten (10) percent of the total project cost or appraised value of the property after rehabilitation. Funds are available to units of local government, nonprofit agencies, public agencies or limited partnerships.
14. ***Disaster Housing Assistance Program/Disaster Voucher Payment (DHAP).*** KHC begin working with local office of the Federal Emergency Management Agency (FEMA) to respond to the needs of the evacuees of Hurricane Katrina and Hurricane Rita around September/October 2005. KHC served approximately 96 families under the DHAP Program. FEMA eventually contracted with Corporate Lodging to administer the assistance payments. The program became DVP (Disaster Voucher Payment) later and currently KHC has been able to place a number of the eligible families under the Housing Choice Program. The program is funded by the U.S. Department of Homeland Security.

15. ***Safe Havens Program (previously reported as the Safe Start Transitional Housing Program)***. The Safe Havens Program is one of the programs that KHC has developed as part of the strategy to meet its goal under Kentucky's Ten-Year Plan to End Chronic Homelessness. All grants will be used for supportive services; none will pay KHC's administrative or other expenses. A portion of the funding for this program is derived from HOME funds. HOME is a HUD-funded program. Incomes of those will not exceed 120% of area median income. Supportive services will be made available to program participants throughout the term of participation and for three (3) months following completion. Preference will be given to those individuals in rural areas who are most difficult to serve due to poverty, social and cultural challenges and geographic isolation. KHC administers the statewide program and requests for assistance are submitted to KHC from supportive services. KHC staff will issue an emergency housing voucher within 24 hours of request; provide a housing quality standard inspection of a selected housing unit for the client within 48 hours; issue a permanent housing voucher as soon as one is available; contact supportive service agencies and promote the availability of Individual Development Accounts (IDA) and the Family Self Sufficiency program. (Note: The Safe Start Transitional Housing Program was renamed Safe Havens in 2009.)

Kentucky Higher Education Assistance Authority (KHEAA)

The following two (2) programs received funds during the 2010-2011 fiscal year:

1. ***Federal Family Educational Loan Program***. Pursuant to KRS 164.744, KHEAA administered programs of student financial assistance in the form of insured student loans, student grants, scholarships and work-study opportunities. Federal financial assistance was received through the Federal Family Educational Loan Program (FFELP) {20 U.S.C. § 1071 et seq.} and the State Student Incentive Grant Program (20 U.S.C. §1070c). KHEAA administered those federal funds through its Insured Student Loan Program and its College Access Program ("CAP") of student grants.

Pursuant to 34 C.F.R. § 100.2, federal financial assistance provided "by way of insurance or guaranty contracts" is not subject to the provisions of 34 C.F.R. Part 100 and Title VI of the Civil Rights Act of 1964. Consequently, the provisions of Title VI do not apply to KHEAA's Insured Student Loan program under the Federal Family Educational Loan Program.

** NOTE: The Health Care and Education Reconciliation Act of 2010 and the Student Aid and Fiscal Responsibility Act (SAFRA) have eliminated the FFELP program and all student loans are now issued by the federal government. This went into effect on July 1, 2010. As such, this program is no longer in effect and this will be the last year it will be reported.

2. ***College Access Challenge Grant Program***. The College Access Challenge Grant Program (CACG) funds outreach activities to emphasize the importance of pursuing higher education for all citizens of the Commonwealth. Funds are provided by the U.S. Department of Education. Potential beneficiaries of this outreach grant program include

elementary, middle and high school students, parents, adult learners, non-traditional students, as well as school counselors who can assist KHEAA in promoting higher education opportunities.

KHEAA is required to utilize grant funds to perform a variety of outreach activities to promote higher education opportunities. Outreach activities include, but are not limited to the following:

1. Participating in career fairs and financial aid/financial literacy workshops;
2. Disseminating KHEAA information, materials, media packets, and publications, including;
 - a. Producing a series of age-appropriate publications designed to provide students, parents and college access mentors with the timely information needed at each grade level.
 - b. Providing a monthly financial literacy tip to Kentucky print media. The tips, which are geared toward students, have addressed such topics as credit cards, insurance, budgeting and identity theft. The series was begun in response to requests from Kentucky counselors for materials helping students become more financially aware;
3. assisting students and families in completion of the Free Application for Federal Student Aid (FAFSA); and,
4. participating in radio, television and newspaper interviews.

In addition, KHEAA's mobile classroom (the College Info Road Show) visited middle schools, high schools, adult education centers, public libraries and other sites, providing college access and financial aid planning services directly to students and families in their own communities.

Kentucky Higher Education Student Loan Corporation (KHESLC)

1. ***Federal Family Educational Loan Program.*** The Kentucky Higher Education Student Loan Corporation (KHESLC) made, financed, purchased, and serviced student loans under the Federal Family Education Loan Program (FFELP), including Federal Stafford Loans, Federal PLUS Loans, and Federal Consolidation Loans. Stafford subsidized and unsubsidized loans are provided to college students to help pay higher education expenses. The federal government pays interest on subsidized Stafford Loans while the student is in school, during a six-month grace period after the student leaves school, and during authorized deferment periods. Unsubsidized Stafford Loans do accrue interest during these periods, but interest can be delayed via capitalization. Low-interest PLUS Loans are for parents, graduate, and professional students; payments generally begin shortly after disbursement. FFELP borrowers who want to combine their loans into one for repayment

purposes may be eligible for a Consolidation Loan. KHESLC obtained the funds to finance student loans through the issuance of taxable and tax-exempt bonds.

** NOTE: The Health Care and Education Reconciliation Act of 2010 and the Student Aid and Fiscal Responsibility Act (SAFRA) have eliminated the FFELP program and all student loans are now issued by the federal government. This went into effect on July 1, 2010. As such, this program is no longer in effect and this will be the last year it will be reported.

Other Attached Agencies

The following agencies, attached to the Finance and Administration Cabinet, did not receive federal funding during the reporting period:

- Commonwealth Credit Union
- Kentucky Gas Pipeline Authority
- Kentucky Executive Branch Ethics Commission
- School Facilities Construction Commission
- Kentucky Teachers' Retirement System
- Turnpike Authority of Kentucky
- Kentucky River Authority

***Efforts to Provide Meaningful Access to Services,
Programs and Benefits to Individuals with Limited English Proficiency (LEP)***

According to Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency (LEP)” and the requirements of Title VI, the Cabinet must provide LEP individuals with meaningful and equitable access to programs and activities. As such, the Cabinet must ensure LEP individuals can effectively participate in and benefit from all programs and activities.

During fiscal year 2011, the Cabinet, its administratively attached agencies and their sub-recipients accomplished the following: continued to display equal opportunity, affirmative action and fair housing posters in English and Spanish; identified staff with proficiency in sign language and in languages other than English; provided Title VI training as part of new employee orientation; included Title VI responsibilities in employee handbooks; and, discussed LEP during Title VI training.

The Cabinet and its administratively attached agencies also implemented Phase 4 of the LEP implementation plan. During Phase 4 the Cabinet: developed a timeline for completion; analyzed data gathered from the self-assessment tool; continued to compile and update LEP activities; provided Title VI/LEP training for employees involved in federally funded programs and activities; and began to finalize the LEP Plan update. The LEP Plan will be completed by March 31, 2012 and submitted with the 2012 update. In addition, agencies and employees involved in federally funded programs and activities will receive LEP toolkits by December 31, 2011.

Specific activities are as follows:

Department of Revenue

- Taxpayer service centers are located in ten (10) cities. Two locations have an individual with sign language (English) proficiency. One location has an individual with a conversational level of proficiency in Albanian. Two locations have individuals with a conversational level of proficiency in Spanish. One location has individuals with a conversational level of proficiency in German and Chinese.
- The department lists a number of employees in the main office building on its intranet site who serve as interpreters at a conversational level of proficiency. Languages included on this list are: Mandarin and Cantonese Chinese, French, German, Hindi, Nepali, Russian, Hebrew, Serbo-Croatian (Bosnian), and Spanish.
- The department also allows interested employees to utilize a software product called Rosetta Stone that increases their conversational level of proficiency in Spanish. Upon completion, the employee should demonstrate conversational levels of proficiency.

Commonwealth Office of Technology

- One of the goals of the Federal BTOP-SBDD program is to raise awareness, availability and adoption of high-speed internet access among populations that currently are unserved or do not utilize broadband. Special focus will be geared on those identified as vulnerable populations (i.e. children, seniors, impoverished, language barriers, etc). Once we can identify these populations around the Commonwealth, outreach will be targeted to their specific needs. At this time, an overall project plan is currently being developed and will include ways to meet those with language barriers. The project is expected to be executed by the end of year 2014.

Kentucky Housing Corporation

- KHC displays Fair Housing posters in all KHC offices in English and Spanish. In addition, the posters are sent to funding recipients.
- Direct assistance to LEP clients is provided by KHC onsite staff with interpretation skills and, when needed, by outside interpretation services.
- In 2009, KHC completed an LEP plan for its Tenant-Based, Rental Department; and, plans are underway to develop a Corporate LEP Plan.

Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Higher Education Student Loan Corporation (KHESLC).

The vast majority of clients with whom KHEAA and KHESLC have contact are English-proficient individuals. Contact with LEP individuals is most prevalent with KHESLC's Customer Service and Debt Recovery staff.

- KHEAA and KHESLC continue their efforts to recruit staff fluent in Spanish. KHESLC has Spanish-speaking employees who can assist with actual and potential LEP clients as needed. (Note: The KHEAA website has a link to access Spanish versions of financial aid materials (including the FAFSA).
- KHEAA outreach publications are available in Spanish translations. However, limited fiscal resources have been a barrier to purchasing software to enable all of KHEAA's publications to be available in Spanish and other languages.
- KHEAA staff has also conducted workshops at various locations across the Commonwealth. The content was simultaneously translated into other languages through interpreters provided by the entity that requested KHEAA's participation.
- Long term goals have been set to provide translated versions of agency publications as well as additional interpretive services.

VII. Complaint Procedures

The following are complaint procedures for the Finance and Administration Cabinet, as a whole, and the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority, and Kentucky Higher Education Student Loan Corporation, as administratively attached agencies (please note these procedures have been reviewed and approved by the Finance and Administration Cabinet):

Finance and Administration Cabinet

A recipient or applicant of federal financial assistance may, upon adverse action by the Finance and Administration Cabinet, submit a written complaint to the Finance and Administration Cabinet. The Cabinet shall respond to the complaint according to 11 KAR 4:030 (1). Anyone believing that the Cabinet, through its administration of federal financial assistance, has discriminated against a beneficiary on the basis of race, color or national origin may file a complaint. Complaints must be filed with the Title VI Coordinator in the Finance and Administration Cabinet, Office of Equal Employment Opportunity and Contract Compliance within 180 days of the alleged discrimination. Complaints may be filed orally or in writing.

Oral complaints will be documented by the Title VI Coordinator using the Complaint under the Civil Rights Act of 1964 form. Except where a violation of Title VI is verified by the Title VI Coordinator or by an external agency with the appropriate authority, the Title VI Coordinator will not initiate an investigation until the complainant acknowledges the complaint by signing the complaint form.

Written complaints—preferably using the Complaint under the Civil Rights Act of 1964 form—may be completed by the complainant or an authorized representative. If the complainant prefers not to use the form, a written statement of the circumstances surrounding the complaint may be submitted.

Upon receipt of the complaint, the Title VI Coordinator shall determine whether the complaint merits an investigation. If the Title VI Coordinator determines that the complaint does not warrant an investigation, the Title VI Coordinator shall notify the complainant in writing. The written notification shall include information about the complainant's right to file the complaint externally with the Kentucky Commission on Human Rights and/or the Director, External Civil Rights Unit, United States Department of Treasury, as appropriate. If the Title VI Coordinator determines that the complaint warrants an investigation, the investigation shall commence within thirty (30) calendar days after receipt of the complaint.

Within thirty (30) days after receipt of a complaint related to services and/or benefits provided by an Internal Revenue Service (IRS) financial assistance program, the program head shall notify the IRS External Civil Rights Unit. The notification will provide information about any complaint investigation that is or will be conducted by the Finance and Administration Cabinet.

The identity of the complainant shall be kept confidential except to the extent necessary to:

- conduct the investigation or any related administrative or judicial proceeding
- resolve the noncompliance
- report compliance and enforcement efforts

The results of any investigation shall be reported to the program head and to the Secretary of Finance using the Report of Investigation form. This form summarizes the report of investigative findings. Should the investigation reveal a Title VI violation, the report shall reflect appropriate corrective action. The report shall be forwarded to the complainant within ten (10) working days after being submitted to the program head and to the Secretary of Finance.

The Title VI Coordinator may terminate the investigation if the complainant fails to cooperate with the investigation or if the complainant fails to submit requested material documentation or evidence within a reasonable timeframe. The Title VI Coordinator will send written notification to the complainant upon terminating the investigation.

Withdrawal of Complaints: If the complainant decides to withdraw the complaint, the complainant shall submit the Withdrawal of Complaint form to the Title VI Coordinator.

Coordination of External Complaints: Pursuant to KRS 344.200, a complaint must be filed with the Kentucky Commission on Human Rights within 180 days of the alleged discrimination. As appropriate, a complaint may also be filed with the Director, External Civil Rights Unit, United States Department of Treasury. A complaint may first be filed with the Finance and Administration Cabinet and subsequently, upon finalization of the Finance and Administration Cabinet's action, with external agencies. Complaints may also be filed concurrently with an external agency—Kentucky Commission on Human Rights and/or United States Department of Treasury, External Civil Rights Unit, as appropriate.

Kentucky Housing Corporation

All programs subject to Title VI compliance have individual grievance procedures for complaints that allow program beneficiaries an opportunity for an informal review. If a program beneficiary exhausts the sub-recipient's grievance procedure and receives an adverse determination of his or her complaint, the program beneficiary may directly submit an appeal to KHC. This appeal must be postmarked within ten (10) working days of the final decision by the sub-recipient to be valid. The appeal must be submitted to the Title VI Compliance Officer, Kentucky Housing Corporation, 1231 Louisville Road, Frankfort, Kentucky 40601.

If a program beneficiary needs assistance in filing a written complaint or must make an oral complaint, he or she may contact the Title VI Compliance Officer at (502) 564-7630, extension 440, or TTY/V (800) 648-6056/6057. To comply with the Americans with Disabilities Act, contact KHC for assistance if special accommodations are necessary. The Title VI Compliance Officer will utilize a standard complaint form. Upon receipt of the complaint, the Title VI Compliance Officer must acknowledge the complaint within fifteen (15) working days. The

Title VI Compliance Officer will process the complaint within thirty (30) working days of receipt.

The program beneficiary may withdraw the complaint, in writing, at any time during the process. The complaint will be reviewed, and a report of the finding(s) will be forwarded to the sub-recipient, chief program officer and the KHC department responsible for administering the program. The complaint and all relevant documentation will be forwarded to the Kentucky Commission on Human Rights or other recognized enforcement authorities. The Title VI Compliance Officer shall follow up on enforcement proceedings and report to the chief program officer when appropriate.

Kentucky Higher Education Assistance Authority (KHEAA) and Kentucky Higher Education Student Loan Corporation (KHESLC)

Complaints in relation to alleged discrimination under Title VI of the Civil Rights Act of 1964 may be filed with the KHEAA or KHESLC Title VI Compliance Officer or other employee designated by the Compliance Officer using the Complaint under the Civil Rights Act of 1964 form. Upon receipt of a written complaint, the Title VI Compliance Officer will review the complaint and will file, within seven (7) days, a concise statement with the Executive Director regarding the nature of the complaint and the steps to be taken to investigate or resolve the complaint.

If an individual refuses to submit a written complaint, the Title VI Compliance Officer will record the information received orally from the individual and will provide a copy to the individual with a request that the complainant confirm the information.

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

KHEAA or KHESLC will act on a complaint by any individual, provided that no final action will be taken by KHEAA or KHESLC unless the ultimate beneficiary or participant acknowledges the substance of the complaint in writing. If the Title VI Compliance Officer determines independently that a violation of Title VI has occurred, then final action may be taken by KHEAA or KHESLC without verification by the beneficiary or participant. Complaints must be filed within 180 days of the activity which prompts the filing of complaints.

Upon receipt of a complaint from an individual or at the time the Title VI Compliance Officer becomes independently aware of actions which may constitute a violation of Title VI, the Title VI Compliance Officer will take necessary action within thirty (30) days to investigate and recommend specific actions to resolve the complaint. The Title VI Compliance Officer will file a report with the Executive Director within that period.

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

KHEAA or KHESLC will make a reasonable attempt to maintain the confidentiality of the complaint and the name of the complainant.

The Executive Director will implement corrective actions within thirty (30) days of receipt and acceptance of a final report by the Compliance Officer.

Coordination of External Complaints: Pursuant to KRS 344.200 and 34 C.F.R. § 100.7, a complaint must be filed with an external agency—either the Kentucky Commission on Human Rights or with the Regional Office for Civil Rights of the USDE—within 180 days of the incident of alleged discrimination. A complaint may first be filed with KHEAA or KHESLC and subsequently, upon finalization of the KHEAA or KHESLC action, with one of these external agencies, or complaints may be filed concurrently with any of the agencies.

If, at any time during the course of receiving or investigating a complaint, the Title VI Compliance Officer becomes aware that the complainant has also filed the same or a related complaint with the Kentucky Commission on Human Rights or with the Regional Office for Civil Rights of the USDE, the Title VI Compliance Officer may continue or suspend the internal investigation, upon notice to the complainant. At any time after the Report of Investigation has been submitted to the Executive Director, all further action, including complaint resolution and remedial action, may be suspended by the Executive Director pending the outcome of the external complaint.

The Title VI Compliance Officer, upon notification of a complaint by any party, or upon becoming aware of any violation through compliance efforts, will attempt to secure voluntary compliance with Title VI. In the event that efforts to attempt to secure voluntary compliance are not secure within a reasonable period of time, the Title VI Compliance Officer will notify the Executive Director in writing of the recommended corrective action.

The Executive Director will act within thirty (30) days of receipt of a recommendation by the Title VI Compliance Officer to implement a corrective action.

The Executive Director or Title VI Compliance Officer will notify the complainant in writing of the resolution of a complaint. A statement of corrective action will include specific statements of actions to be taken or prohibited actions and will include a timetable for implementation.

Employees who refuse to voluntarily comply with Title VI or to take corrective actions required by KHEAA or KHESLC will face disciplinary action.

If the complainant is not satisfied with a finding of non-discrimination or proposed remedial action, the complainant may file an appeal with the Title VI Compliance Officer within thirty (30) days from the date the Report of Investigation is completed.

Withdrawal of Complaints: Any withdrawal of a complaint will be in writing and signed by the individual filing the withdrawal. Withdrawal of a complaint is at the discretion of the Executive Director. The Executive Director will determine whether the withdrawal of the complaint is in the best interest of the Title VI compliance and whether the investigative report will be completed.

****NOTE:** KHESLC received one complaint during the 2010-2011 fiscal year in regards to the Federal Family Loan Program, charging alleged discrimination on the basis of race and sex. This complaint was later withdrawn by the complainant.

IX. Agency Training Plan

The following are agency training plans for the Finance and Administration Cabinet, as a whole, and the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority, and Kentucky Higher Education Student Loan Corporation, as administratively attached agencies:

Finance and Administration Cabinet

In-service training programs for employees will continually apprise appropriate staff of their responsibility to render high quality services to all clients regardless of their race, color or national origin. The Finance and Administration Cabinet will provide written notice to all current employees concerning the Cabinet's commitment to assuring compliance with Title VI and include a Title VI module in its new employee orientation program. Should additional training become available, the Title VI Coordinator will attend and disseminate the benefit of the training to pertinent Finance and Administration Cabinet staff, Title VI Compliance Officers and program heads. Sub-recipients and beneficiaries (if any) shall be provided with explanatory materials and technical assistance as necessary to ensure their knowledge of, and compliance with, Title VI requirements.

The Cabinet's Title VI Coordinator, agency Title VI Compliance Officers and other employees with Title VI responsibilities will attend training co-sponsored by the Auditor of Public Accounts and the Kentucky Commission on Human Rights. In the past, this training focused on Title VI implementation and covered initial plans, plan updates and limited English proficiency.

Kentucky Housing Corporation

According to its policy, KHC recruits, hires, trains and promotes persons in all job classifications without regard to race, color, religion, gender, national origin, disability or age. Staff development and training will include regular sessions addressing discrimination. The Title VI Compliance Officer will develop techniques and methods for communicating policies to staff, sub-recipients, vendors and present and potential beneficiaries. New KHC staff will receive Title VI information during employee orientation. The Title VI Compliance Officer will train KHC management on how to eliminate discrimination practices. Management will address Title VI during regular staff meetings. Further, KHC staff will be provided with specific examples of prohibited discriminatory practices affecting housing delivery.

Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Higher Education Student Loan Corporation (KHESLC)

It is the policy of KHEAA or KHESLC to recruit, hire, train and promote persons in all job classifications without regard to race, color, religion, sex, national origin, disability or age.

Should additional training become available, the Title VI Compliance Officer will attend and

disseminate the information to pertinent staff members. Staff development and training will include regular sessions addressing discrimination. New staff will receive Title VI information during employee orientation.

KHEAA and KHESLC have no sub-recipients that receive federal financial assistance; therefore, no training plans have been developed for sub-recipients.

KHEAA's and KHESLC's direct contact with the ultimate program beneficiaries is extremely limited. As such, KHEAA and KHESLC rely heavily on printed materials to inform beneficiaries of nondiscrimination policies. Audio tapes are also available for individuals with visual impairments.

X. Evaluation Procedures

The following are evaluation procedures for the Finance and Administration Cabinet, as a whole, and the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority, and Kentucky Higher Education Student Loan Corporation, as administratively attached agencies:

Finance and Administration Cabinet

The Finance and Administration Cabinet will measure its goals through the following activities. Where appropriate, the timeframe for achieving the goal is indicated.

- Annually utilize a self-survey and program review to determine compliance status.
- Initiate corrective action within thirty (30) calendar days of identifying noncompliance.
- Provide information to all current employees and incorporate Title VI information in new employee orientation training. [ongoing]
- Provide cultural diversity training to employees. [ongoing]
- Actively recruit minorities and persons with disabilities for employment. [ongoing]
- Work with administratively attached agencies and Governor's Office/ Boards and Commissions regarding minority representation requirements for advisory boards.
- Annually review all informational program publications pertaining to the Finance and Administration Cabinet's Title VI Implementation Plan.
- Annually review Limited English Proficiency (LEP) activities and status. [ongoing]
- Maintain Title VI Implementation Plans and Plan Updates on file. [ongoing]
- Issue, update and disseminate Title VI policy and procedure. [ongoing]

Kentucky Housing Corporation

KHC is committed to fully implementing all requirements under Title VI. Goals for fiscal year 2011-2012 are as follows:

- Utilize the position of Title VI Compliance Officer to handle the day-to-day Title VI administration and enforcement. [ongoing]
- Actively recruit minorities and persons with disabilities for KHC employment. [ongoing]

- Require that all sub-recipients and agents adopt a Title VI implementation plan. [ongoing]
- Streamline minority data collection. [ongoing]
- Initiate the sub-recipient compliance review process. [ongoing]
- Train KHC employees on Title VI requirements. [ongoing]
- Ensure all new sub-recipients are in compliance with Title VI. [ongoing]
- Complete Phase 4 of the LEP project in conjunction with the Finance and Administration Cabinet. [FY11]

Kentucky Higher Education Assistance Authority (KHEAA) and Kentucky Higher Education Student Loan Corporation (KHESLC)

KHEAA and KHESLC are committed to fully implementing all requirements under Title VI. A compliance review process will be followed to identify areas of noncompliance on an annual basis.

KHEAA and KHESLC shall promptly investigate and respond to all complaints, and will commence corrective action to rectify any identified area of noncompliance within the timeframe and in accordance with the procedures outlined in this plan.

Goals for fiscal year 2010 - 2011 are as follows:

- The Title VI Compliance Officer or designee will handle day-to-day Title VI administrative duties.
- Actively recruit minorities and persons with disabilities for employment. [ongoing]
- Train employees on Title VI requirements. [ongoing]

XII. Recordkeeping and Reporting

The following information is the recordkeeping and reporting for the Finance and Administration Cabinet, as a whole, and the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority, and Kentucky Higher Education Student Loan Corporation, as administratively attached agencies:

Finance and Administration Cabinet

Copies of all complaints, surveys, reports, and Title VI Implementation Plan updates will be kept on file by the Title VI Coordinator. These records will be retained for a period of not less than six (6) years and may be retained at an off-site record facility. Revisions to the Title VI Implementation Plan will be forwarded to the Auditor of Public Accounts and the Kentucky Commission on Human Rights.

Complaint forms will be available from the Title VI Coordinator. Agencies attached to the Finance and Administration Cabinet and program heads with programs and activities subject to Title VI compliance will complete and submit an annual self-survey, compliance status report and narrative update to the Title VI Coordinator before July 1 of each year. Any Title VI Implementation Plan updates required by KRS 344.015 will also be forwarded to the Title VI Coordinator.

Kentucky Housing Corporation

Documents will be maintained and/or destroyed according to the KHC's Records Retention and Disposition Schedule which is reviewed and updated annually. Records may be retained in original form or approved for archival optical imaging. The Title VI Compliance Officer will maintain all complaint forms, ensure that the forms are available for use and maintain a log of all Title VI complaints.

The Title VI Compliance Officer will maintain all sub-recipient plans and updates in the agency's electronic imaging system or through a permanent filing system. This information will be made available to the Title VI Coordinator upon request.

KHC will annually assess corporate performance under Title VI. At a minimum, KHC will complete the following:

- identify potential beneficiaries and applicants
- analyze applicable census data
- analyze participation data
- assess compliance review evaluations
- complete an annual report with findings and steps to correct any deficiencies

Kentucky Higher Education Assistance Authority (KHEAA)

Paper copies of all complaint documents, data reports, annual surveys, and annual updates to KHEAA's Title VI implementation plan will be kept on file by the Title VI Compliance Officer for at least one (1) year. These items will be microfilmed (or scanned with imaging equipment) and retained for at least five (5) years. Original microfilm is routinely sent to the Kentucky Department for Libraries and Archives, and microfilm copies are kept in fireproof cabinets at KHEAA. These records are subject to the Open Records Law and public inspection.

Applicants for CAP grants must complete the Free Application for Federal Student Aid. The United States Department of Education does not permit the collection of data regarding race, color, or national origin on the FAFSA, therefore, KHEAA is unable to collect this information from the application. If the information is available through another agency, the program coordinator will attempt to obtain the information in accordance with 34 CFR Chapter 1, Section 100.6. A report on the effort or the findings will be prepared by the program coordinator and submitted to the Title VI Compliance Officer. This report will be retained in accordance with the procedures described above.

Program heads will complete and submit an annual self-survey of their respective divisions' Title VI compliance and complaint processing to the Title VI Compliance Officer. These surveys will be retained in accordance with the procedures described above.

The annual update of the Title VI implementation plan required by KRS 344.015 will be prepared and submitted to the Title VI Coordinator by the Title VI Compliance Officer. A copy of the update will be retained in accordance with the procedures described above.

Complaint forms are available in the Title VI Compliance Officer's office.

Kentucky Higher Education Student Loan Corporation (KHESLC)

The Title VI Compliance Officer will keep records of all complaints and their resolution for a sufficient period of time to assure information is available for review by auditing agencies. The Title VI Compliance Officer will submit an annual Title VI compliance report, including any updates of changes to this plan to the Title VI Coordinator. The report will discuss specific complaints and summarize Title VI compliance and enforcement data. Yearly reports will be retained indefinitely. Compliance plans for sub-recipients (if any) will be retained and evaluated periodically by the Title VI Compliance Officer, but may be destroyed once an entity is no longer a sub-recipient.

Changes in the Title VI implementation plan will be provided to employees as changes occur.

The Title VI Compliance Officer will periodically evaluate the compliance plans for sub-recipients and make the information available to the Title VI Coordinator.

Participation Data

Office of the Secretary. Funding for the (1) Green Bank of Kentucky Program, (2) Energy Management Program and (3) High Performance Building Staffing Program pass through the Energy and Environment Cabinet to the Finance and Administration Cabinet. As such the Finance and Administration Cabinet is a sub-recipient of the award. The Memoranda of Agreement with the Energy and Environment Cabinet do not require the Finance and Administration Cabinet to track protected status information. The beneficiaries of these programs are state agencies. It should be noted that the Energy and Environment Cabinet will report on these programs in the future, rather than Finance, given that they are the primary recipient.

Commonwealth Office of Technology. Users include state and local government agencies and the public. Protected status information is not tracked.

Department of Revenue. Participation is open to all taxpayers without regard to race, color, or national origin. The department does not track protected status information.

Kentucky Housing Corporation. The breakdown by race/ethnicity of persons assisted with federal funds is as follows:

1. Housing Counseling Assistance Program for Foreclosure (Kentucky Homeownership Protection Center)/Homeownership Counseling Program: Participants in the program totaled 7,471, of which 31.09% were minority. The breakdown of minority by race and ethnicity is as follows: American Indian/Alaskan Native (39); Asian (19); Black/African American (2,002), Native Hawaiian/other Pacific Islander (37); Hispanic (146); Multi-racial (80). (Note: 189 declined to specify)
2. Homeless Prevention and Rapid Re-housing Program (KY Hearth): Participants in the program totaled 7,965, of which 8.63% were minority. The breakdown of minority by race and ethnicity is as follows: Hispanic (65); American Indian/Alaskan Native (10); Asian (6); Black/African American (400); Native Hawaiian/Pacific Islander (1); Multi-racial/other (206).
3. Weatherization Assistance Program: Participants in the program totaled 3,715, of which 10.96% were minority. The breakdown of minority by race and ethnicity is as follows: African American (347); American Indian and Alaska Native (6); Asian (5); Multi-Racial (2); Native Hawaiian and Other Pacific Islander (1); Hispanic (3); Other (43).
4. HOME Program: Assistance was provided to 170 persons, of which 14.12% were minority. The breakdown of minorities by race is as follows: Black/African American (16); American Indian/Alaskan (3); Multi-Racial (1); Hispanic (1) and Other (3).
5. ESG Program: Assistance was provided to 7,492 persons, of which 9.64% were minority. The breakdown of minority by race and ethnicity is as follows: Black/African American (488); American Indian/Alaskan Native (11); Asian (1); Native Hawaiian/Pacific (3); Hispanic (70); and Other/Multi-Racial (149).

6. Supportive Housing Program: Participants in the program totaled 2,975, of which 11.66% were minority. The breakdown of minority by race and ethnicity is as follows: Hispanic (20); American Indian/Alaskan Native (7); Asian (7); Black/African American (242); Native Hawaiian/Pacific Islander (1); Multi-racial/Other (70)
7. Housing Choice Voucher Program/ Section 8 Family Self-Sufficiency Program (FSS)/ Shelter Care Plus Housing/Disaster Housing Assistance Program (DHAP)/ Safe Havens Program: Assistance was provided to 4,700 persons, of which 29.00% were minority. The breakdown of minority by race and ethnicity is as follows: Black/African American (1,222); Hispanic (47) and Multi-Racial (94).
8. Rental Administration Program: Assistance was provided to 25,469 persons, of which 25.86% were minority. The breakdown of minority by race and ethnicity is as follows: Black/African American (5,973); Alaskan/Indian (65); Asian (82); Hawaiian/Pacific (19); Hispanic (311); and Other (136). (Note: 403 individuals declined to self identify)
9. HOPWA Program: Assistance was provided to 355 persons, of which 37.75% were minority. The breakdown of minority by race and ethnicity is as follows: Black/African American (77); American Indian/Alaskan (1); Hispanic (33) and Other (23).
10. Kentucky Appalachian Housing Program: This is a Regional program, therefore KHC does not track protected status information.

Kentucky Higher Education Assistance Authority (KHEAA). Educational loans are guaranteed for all qualified applicants without regard to race, color, or national origin. Thus, members of the protected categories participate fully on the Agency's program. However, the race, color, or national origin of program participants is not tracked by the Agency, and data in that regard is not available.

Kentucky Higher Education Student Loan Corporation (KHESLC). Participation is open to all qualified persons without regard to race, color, or national origin. Protected status information is not tracked.

XIII. Minority Representation on Planning or Advisory Boards

The following presents the employment data and minority representation on planning or advisory boards for the Finance and Administration Cabinet, as a whole, and the Kentucky Housing Corporation, Kentucky Higher Education Assistance Authority, and Kentucky Higher Education Student Loan Corporation, as administratively attached agencies:

Finance and Administration Cabinet

The Finance and Administration Cabinet (Cabinet) recognizes its responsibility to abide by the provisions of Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, the Civil Rights Act of 1991, the Age Discrimination in Employment Act of 1967, the Equal Pay Act of 1963, the Kentucky Civil Rights Act and any Executive Order issued by the Governor of the Commonwealth of Kentucky. Further, the Cabinet affirms its commitment to the affirmative action plan for Kentucky state government as adopted by Executive Order.

The Finance and Administration Cabinet employed 1,822 individuals at June 17, 2011. Minority employees accounted for 7.52 percent of the total. A breakdown of minority by race/ethnicity is as follows: Black/African American (100); Hispanic/Latino (4); Asian (21); American Indian/Alaskan Native (5); and Two or More Races (7). This data was supplied by the Kentucky Finance and Administration Cabinet, Personnel Office.

Employment data for specific Finance and Administration Cabinet offices/departments with programs or activities subject to Title VI follows.

Office of the Secretary

Total Employees: 138 (11.59% Minority)
Black/African American: 16

Commonwealth Office of Technology

Total Employees: 350 (8.86% Minority)
Black/African American: 15
Hispanic/Latino: 1
Asian: 11
American Indian/Alaskan Native: 2
Two or More Races: 2

Department of Revenue

Total Employees: 956 (7.28% Minority)
Black/African American: 50
Hispanic/Latino: 2
Asian: 9
American Indian/Alaskan Native: 3
Two or More Races: 5

The Cabinet discontinued diversity training in January 2010 due to limited resources. However, the training is available to all state employees from the Personnel Cabinet. Finance Cabinet representatives are currently working with the Personnel Cabinet to provide diversity training to Finance managers and supervisors.

*Minority Representation on Planning or Advisory Boards where funds
“pass through” the Office of the Secretary.*

Funding for this program passes through the Energy and Environment Cabinet to the Finance and Administration Cabinet. As such the Finance and Administration Cabinet is a sub-recipient of the award. It should be noted that the Energy and Environment Cabinet will report on this program in the future, rather than Finance, given that they are the primary recipient.

Green Bank of Kentucky Program. The Executive Advisory Committee (“Loan Committee”) approves or denies loan applications and approves the issuance of loan proceeds. Members of the Loan Committee meet and adopt policies and procedures to ensure fair and equitable treatment of all applicants. Beneficiaries of this program are state agencies. The Loan Committee is comprised of eight (8) members. Currently, there are no racial/ethnic minorities serving on the Loan Committee. However, Loan Committee membership is established by an administrative order from the Finance and Administration Cabinet. Committee members serve by virtue of the positions they hold; and, the Cabinet is not aware of any appointed minority officials with expertise in this area. Members of the Loan Committee include the following:

1. Secretary of the Finance and Administration Cabinet or designee. The Finance and Administration Cabinet Secretary serves as Chair of the Committee.
2. Secretary of the Energy and Environment Cabinet or designee. The Energy and Environment Cabinet Secretary serves as Vice-Chair of the Committee.
3. Director of the Energy and Environment Cabinet’s Division of Efficiency and Conservation, Department of Energy Development and Independence or designee.
4. State Budget Director or designee.
5. Commissioner of the Department of Local Government or designee.
6. Commissioner of the Finance and Administration Cabinet’s Department for Facilities and Support Services or designee.
7. Executive Director of the Finance and Administration Cabinet’s Office of the Controller or designee.
8. Executive Director of the Finance and Administration Cabinet’s Office of Financial Management or designee.

Kentucky Housing Corporation

KHC employed 308 individuals at May 11, 2011. Minority employees accounted for 12.33 percent of the total. A breakdown of minority by race/ethnicity is as follows: Black/African American (29); Hispanic/Latino (4); Asian/Pacific Islander (3); and American Indian/Alaskan Native (2). This data was supplied by the Kentucky Housing Corporation.

Minority Representation in the Workforce and on Planning or Advisory Boards for Kentucky Housing Corporation

KHC is governed by a 15-member board appointed by the Governor of the Commonwealth of Kentucky. Two (2) members of the board are minorities. Minorities comprised 13.33% of the total. A breakdown of minority by race is as follows: Black/African American (2).

In addition to the board, KHC also has two (2) advisory committees. Information about the committees follows.

1. Housing Policy Advisory Committee: During the 1996 legislative session, the General Assembly found and declared it to be in the public interest to establish a state policy on housing. Section 2 of the Commonwealth of Kentucky Housing Policy Act states KHC shall oversee the development and implementation of Kentucky housing policy. Further, KHC was charged with creating an advisory committee on housing policy consisting of nine (9) ex officio state government members, seventeen (17) at-large members appointed by the chairman of the board of directors of KHC, one (1) member of the Senate and one (1) member of the House of Representatives. The advisory committee submits an annual report of activities and recommendations to the Governor.

The Housing Policy Advisory Committee currently has 28 members. Three (3) members are minorities (10.71%). A breakdown of minority by race is as follows: Black/African American (3).

2. Affordable Housing Trust Fund Advisory Committee: The Affordable Housing Trust Fund (AHTF) Advisory Committee was created pursuant to KRS 198A.725 to address the critical needs of very low-income Kentuckians, including the mentally and physically disabled and those on the verge of homelessness. The fund supports projects that assist persons at or below 60 percent of the area median income, with a preference to help persons at or below 30 percent of the area median income.

The AHTF Advisory Committee consists of eleven (11) members appointed by the chairman of the board of directors of KHC. Three (3) members shall be appointed from representatives from each of the following categories of organizations: (1) The Home Builders Association of Kentucky, the Kentucky Manufactured Housing Institute, the Apartment Association, the Kentucky Association of Realtors, the Kentucky State Building Trades Council, the Mortgage Bankers Association of Kentucky and the Kentucky Bankers Association; (2) the Homeless and Housing Coalition of Kentucky, builders or nonprofit housing organizations, support service providers, homeless persons

and very low-income tenants; and, (3) the Kentucky Association of Counties, the Kentucky League of Cities and agencies of state government. The remaining two (2) members appointed shall include one (1) member of the Kentucky Senate and one (1) member of the Kentucky House of Representatives.

The AHTF Advisory Committee currently has 11 members. Two (2) members are minorities (18.18%). A breakdown of minority by race is as follows: Black/African American (2).

Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Higher Education Student Loan Corporation (KHESLC).

KHEAA employed 55 individuals at June 17, 2011. Minority employees represented 3.57 percent of the total. A breakdown of minority by race/ethnicity is as follows: Black/African American (1) and American Indian (1).

KHESLC employed 254 individuals at May 31, 2011. Minority employees comprised 13.39 percent of the total. A breakdown of minority by race/ethnicity is as follows: Black/African American (28); Hispanic/Latino (2); Hawaiian/Pacific Islander (2); American Indian (1) and Asian (1).

It is the goal of state government, KHEAA, and KHESLC to achieve a workforce as diverse as the population of the Commonwealth. The current goal is to have 10% of the workforce comprised of minorities. KHEAA and KHESLC continue to identify and employ qualified minority applicants.

*Minority Representation in the Workforce and on Planning or
Advisory Boards for the Kentucky Higher Education Assistance Authority (KHEAA)
and the Kentucky Higher Education Student Loan Corporation (KHESLC)*

KHEAA and KHESLC are governed by a 15-member Board of Directors, pursuant to KRS 164.746 and KRS 164A.050; ten (10) are appointed by the Governor and 5 serve by virtue of the office or position they hold within state government or an organization (ex officio). Currently, there are no racial/ethnic minorities serving on the board. KHEAA/KHESLC will refer potential interested candidates—including racial/ethnic minority candidates—to the Governor's Office of Boards and Commissions.

I. Glossary of Common Terms

AHTF	Affordable Housing Trust Fund
AHOA	AIDS Housing Opportunity Act
AIDS	Acquired Immunodeficiency Syndrome
ARC	Appalachian Regional Commission
ARRA	American Recovery and Reinvestment Act of 2009
Assurance	A written statement or contractual agreement signed by the agency head in which a recipient agrees to administer federally assisted programs in accordance with civil rights laws and regulations.
At Risk	Sub-recipients who do not act to address recommendations for minor violations or obvious civil rights violations identified by the Finance and Administration Cabinet or its attached agencies for compliance with Title VI of the Civil Rights Act of 1964
Beneficiary	Applicant or recipient for whose benefit federal funds are intended
Board of Directors	Board of directors appointed by the Governor of the Commonwealth of Kentucky to govern the Kentucky Higher Education Assistance Authority, the Kentucky Higher Education Student Loan Corporation, and the Kentucky Housing Corporation
Broadband	Broadband in telecommunication refers to a signaling method that includes or handles a relatively wide range (or band) of frequencies. The wider (or broader) the bandwidth of a channel, the greater the information-carrying capacity.
CACG	College Access Challenge Grant Program
CAP	Cooperative Agreements Program
CAP Grant	College Access Program grant administered pursuant to KRS 164.7535
C.F.R.	Code of Federal Regulations
CCU	Commonwealth Credit Union
Cabinet	Finance and Administration Cabinet

Chief of Staff	Executive responsible for assisting the Chief Executive Officer with administration of the Kentucky Higher Education Assistance Authority or the Kentucky Higher Education Student Loan Corporation
Chief Executive Officer	Agency head of the Kentucky Higher Education Assistance Authority of the Kentucky Higher Education Student Loan Corporation; Agency head of the Kentucky Housing Corporation reporting directly to the board of directors
Chief Operating Officer	Executive responsible for overseeing agency operations of the Kentucky Higher Education Assistance Authority and the Kentucky Higher Education Student Loan Corporation
Chief Program Officer	Executive responsible for the overall administration of the Kentucky Housing Corporation's programs
Code of Ethics	Executive Branch Code of Ethics
Commonwealth Map	The statewide digital basemap containing twelve data layers which is linked to <i>The National Map</i> and is available free via the Internet for interactive mapping and geographic data querying and downloading.
Complaint	A verbal or written allegation of discrimination indicating that a federally assisted program is operated in such a manner that it results in disparity of treatment to persons or groups of persons based on race, color or national origin.
Compliance	The fulfillment of the requirements of Title VI, other applicable laws, implementing regulations and instructions to the extent that no distinctions are made in the delivery of any service or benefit on the basis of race, color or national origin.
Compliance Personnel	Staff in the Kentucky Housing Corporation's Compliance Department; the department conducts reviews—which includes Title VI compliance—for programs such as HOME, ESG and HOPWA
DHAP	Disaster Housing Assistance Program
DVP	Disaster Voucher Payment
Discrimination	Any distinction made between one person or group of persons and others either intentionally, by neglect, or by the

effect of actions or lack of actions based on race, color or national origin.

EEO	Equal Employment Opportunity
ESG	Emergency Shelter Grant program
Eligible Beneficiary	Applicant or recipient for whose benefit federal funds are Intended
Executive Director	Agency head of the Kentucky Higher Education Assistance Authority or the Kentucky Higher Education Student Loan Corporation
FAFSA	Free Application for Federal Student Aid
FEMA	Federal Emergency Management Agency
FFELP	Family Federal Education Loan Program
FGDC	Federal Geographic Data Committee
FSS	Section 8 Family Self-Sufficiency Program
Federal Assistance	Any federal funding, property or aid provided for the purpose of assisting a beneficiary
Full Compliance	Sub-recipients that have executed and delivered all documentation requested by the Finance and Administration Cabinet and its attached agencies assuring that compliance with Title VI of the Civil Rights Act of 1964 has been and will be maintained
Geospatial	Having to do with entities or events that can be described in a geographic fashion. A term widely used to describe the combination of spatial (space) software and analytical methods with terrestrial or geographic (the study of the Earth and its lands, features, inhabitants, and phenomena) datasets. The term is often used in conjunction with geographic information systems and geometrics (the discipline of gathering, storing, processing, and delivering geographic information, or spatially reference information), never separately.
GIS	Geographic Information Systems
HOME	HOME Investment Partnership Program

HOPWA	Housing Opportunities for Persons With AIDS
HUD	Housing and Urban Development
IDA	Individual Development Accounts
IRS	Internal Revenue Service
IRS SPEC	Internal Revenue Service Stakeholder Partnerships, Education and Communication partnership agreement
Implementation Plan	The plan described herein, as required by KRS 344.015
KHC	Kentucky Housing Corporation
KHEAA	Kentucky Higher Education Assistance Authority
KHESLC	Kentucky Higher Education Student Loan Corporation
KRS	Kentucky Revised Statutes
KTG	Kentucky Tuition Grant
KTRS	Kentucky Teachers' Retirement System
Minor Violation	Identified sub-recipients who must take additional action to achieve full compliance with Title VI of the Civil Rights Act of 1964
Minority	Persons who are distinguishable by immutable characteristics of race, color or national origin
NAHA	National Affordable Housing Act
NSDI	National Spatial Data Infrastructure
NSDI CAP	National Spatial Data Infrastructure Cooperative Agreements Program
NTIA	National Telecommunications and Information Administration
Noncompliance	Failure or refusal to comply with Title VI of the Civil Rights Act of 1964, other applicable civil rights laws and implementing regulations
Pass-through	Federal funding that is awarded, granted, loaned or otherwise obtained through the Finance and Administration

	Cabinet or one of its attached agencies
Program Beneficiary	Applicant or recipient for whose benefit federal funds are intended
Program Coordinator	Coordinator of the CAP grant program
Program Head	Executive Director, Commissioner or Division Director responsible for administering Title VI programs or activities
Recipient	Organization to which federal financial assistance is Extended
SAFAH	Supplemental Assistance for Facilities to Assist the Homeless
SAFRA	Student Aid and Fiscal Responsibility Act
SFCC	School Facilities Construction Commission
Sub-recipient	An entity that receives federal financial assistance through another recipient
The National Map	A consistent framework of geographic data that provides the public with access to high quality geospatial data and information and helps support decision-making by resource managers and the public on a global, national and local scale.
Title VI	Section of the Civil Rights Act of 1964 that prohibits discrimination, denial of benefits and exclusion from participation based on race, color, or national origin
Title VI Compliance Officer	Individual responsible for monitoring Title VI compliance for agencies administratively attached to the Finance and Administration Cabinet. These individuals are often designated 'Title VI Coordinators' within their respective agencies.
Title VI Coordinator	Individual responsible for monitoring Title VI compliance for the Finance and Administration Cabinet
U.S.	United States
U.S.C.	United States Code
USDE	United States Department of Education

USDOE	U.S. Department of Energy
Ultimate Beneficiary	Applicant or recipient for whose benefit federal funds are intended
VITA Program	Volunteer Income Tax Assistance Program

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