



Commonwealth of Kentucky  
STOP Violence Against Women Formula Grant  
Program  
FFY 2022 Implementation Plan

Kentucky Justice and Public Safety Cabinet

Grants Management Division

125 Holmes Street

Frankfort, Kentucky

## Contents

<b>I. INTRODUCTION.....</b>	<b>1</b>
<b>II. NEEDS AND CONTEXT .....</b>	<b>3</b>
<b>III. DESCRIPTION OF PLANNING PROCESS.....</b>	<b>6</b>
<b>IV. DOCUMENTATION FROM PROSECUTION, LAW ENFORCEMENT, COURT, AND VICTIM SERVICES PROGRAMS.....</b>	<b>14</b>
<b>V. PLAN FOR THE FOUR-YEAR IMPLEMENTATION PERIOD .....</b>	<b>15</b>
<b>VI. CONCLUSION .....</b>	<b>34</b>

# I. Introduction

- A. The date on which the plan was approved by the State (this should be the final approval, after all other approvals required by the State are completed, such as approvals by the planning committee or by State officials). This plan was approved by the Commonwealth of Kentucky on May 26, 2022.
  
- B. The time period covered by the plan. ([28 C.F.R. 90.12\(a\)](#)). The plan covers the period beginning October 1, 2022, through September 30, 2026.
  
- C. Statement of the Problem and Plan Highlights. The comprehensive data needed to accurately determine the extent of sexual assault, domestic/dating violence and stalking in Kentucky is not readily available. However, by looking at a variety of data sets it quickly becomes clear that sexual assault, dating/domestic violence and stalking are serious problems in Kentucky that need to be addressed.

According to the Kentucky State Police’s 2020 *Crime In Kentucky* publication, 3,651 cases of forcible and 306 cases of non-forcible sex offenses were reported to law enforcement. Non forcible cases include incest and statutory rape. The Kentucky Administrative Office of the Courts (AOC) provided the following information on the disposition of sexual offense cases in 2019.

Court		Acquitted	Amended	Convicted	Dismissed	Diverted	FTA/FTV/AP	Others	Total
Circuit	Charges	95	812	1375	1951	50	73	132	4488
	Cases	26	394	476	393	9	29	12	899
District	Charges	0	134	66	289	11	6	979	1485
	Cases	0	107	59	168	6	5	470	727
Juvenile	Charges	0	104	81	201	15	0	446	847
	Cases	0	79	50	88	12	0	74	245
Total	Charges	95	1050	1522	2260	76	79	1821	6820
	Cases	26	580	585	649	27	34	556	1871

Since, it is estimated that two out of three sexual assaults go unreported, (BJS, National Crime Victimization Survey, 2015-2019 (2020)), the actual number of sexual assaults is likely to be much higher than the numbers reflected by the data above.

The extent of domestic violence may be even more difficult to determine, in part, because Kentucky does not specifically designate crimes as “domestic violence” for purposes of charging and prosecution. According to *Crime In Kentucky*, in 2020, there were 48,462 reports of assault. Although we know that not all reported assaults involved intimate partners, it is likely that a large proportion of these crimes represented altercations between current or former intimate partners, and that there are a tremendous number of unreported assaults. Data from AOC sheds more light on the scope of the problem. In state fiscal year (SFY) 2020, AOC identified 10,116 domestic violence related cases in which charges were filed. These included but were not limited to charges for violations

of protective orders, stalking, strangulation, physical assaults, and homicide. Additionally, in calendar year, (CY) 2018, 25,486 domestic violence related civil cases were filed including petitions for orders of protection. (AOC, Domestic Violence Civil Cases Filed, 2019). Finally, in federal fiscal year (FFY) 2021, Kentucky's domestic violence programs provided shelter to 3060 clients and non-shelter supportive services to 12,796 others.

Generally, the Kentucky Justice and Public Safety Cabinet's Grants Management Division (KJPSC GMD) intends to award projects that:

- Provide non-discriminatory, culturally competent victim services through designated domestic violence and rape crisis programs, regional legal aid providers and other victim service providers that adopt and use meaningful access and whose services are complimentary or supplemental to and not duplicative of the services provided by the designated domestic violence and rape crisis programs.
- Fund specialized units of law enforcement and prosecution specifically targeting violent crimes against women including domestic violence, dating violence, sexual assault, and stalking.
- Provide training and technical assistance for law enforcement, prosecution, courts, and victim service providers to ensure responses to violence against women statewide are informed by known best or promising practices, sensitive to the needs of victims, and hold offenders accountable.
- Fund a diverse array of multi-disciplinary, community coordinated responses by law enforcement, prosecutors, victim services, medical providers, and/or other allied professions to violent crimes against women including domestic violence, dating violence, sexual assault, and stalking.

Specifically, the KJPSC GMD intends to prioritize funding of projects and programs that advance the goals identified by the Implementation Planning Committee as filling gaps in and meeting needs for services in the Commonwealth. These goals include:

- enhancing our efforts to provide meaningful access to and non-discriminatory, accessible, culturally appropriate services for all victims including those from unserved, underserved, and inadequately served populations and culturally specific communities,
- increasing access to quality, affordable and culturally competent legal services,
- increasing access to medical-forensic examinations by specially trained forensic examiners for victims of domestic/dating violence, strangulation, and sexual assault, with no charge to the victim/survivor,

- increasing awareness of the crime of stalking, its impact on victims and the effectiveness of the response of victim service providers, law enforcement and prosecutors, and
- reducing the number of domestic violence-related homicides.

The KJPSC GMD also intends to increase its efforts to identify and reach out to agencies and organizations who might qualify to provide services for which we have had few or no applications. These include:

- culturally specific organizations,
- prosecutorial agencies, and
- law enforcement agencies.

## II. Needs and Context

- A.** Demographic information regarding the population of the State derived from the most recent available United States Census Bureau data including population data on race, ethnicity, age, disability, and limited English proficiency. (28 C.F.R. 90.12(g)(1).

According to the 2020 United States Census Bureau, the Commonwealth of Kentucky's population was 4,505,836 an increase of 3.8% from the 2010 Census. Of these individuals, 82.4% identified as White, 7.9% as Black/African American, 1.7% as Asian, .3% as American Indian and Alaska Native, and .1% Native Hawaiian and other Pacific Islander. 4.6% of Kentucky's residents identified as Hispanic or Latino/Latina individuals. This is a significant, 56.5% increase from the 2010 Census. 50.7% of the population identified as female.

The 2018 Disability Status Report from Cornell University found that the prevalence of disability among all age groups in the United States is 12.6%. In Kentucky, however, the prevalence is much higher. According to the 2020 U.S. Census 13.2% of the population of Kentucky under the age of 65 reported having a disability. A recent study by the CDC's National Center on Birth Defects and Developmental Disabilities found that 1,253,016 or 35% of Kentucky adults have a functional disability. 18% of disabilities are related to mobility, 17% to cognition, 8% to hearing and 7% are related to vision.

Data from the 2020 U.S. Census found that real median earnings of all workers aged 15 and over with earnings decreased 1.2 percent between 2019 and 2020 from \$42,065 to \$41,535 and the 2020 Small Area Income and Poverty Estimates found that 14.9% of Kentucky's population was living in poverty. Conditions were even more bleak for those under 18. According to the 2020 Census, 16.1% of Kentucky's children lived in poverty.

A 2018 study by the American Immigration Council found that Kentucky has a small but growing immigrant population. 169,346 immigrants comprised 4 percent of the population. The top countries of origin for immigrants were Mexico (16 percent of immigrants), Cuba (7 percent), China (6 percent), India (5 percent), and Honduras (4 percent). 6.04% of the households in Kentucky speak a non-English language at home as their primary language. The most common foreign languages spoken in Kentucky are Spanish (119,751 speakers), German (13,299 speakers), and Arabic (10,739 speakers). (Data USA: Kentucky). 125 unique languages were spoken by the 647,987 students being served by Kentucky's public school system during the 2019 – 2020 school year. 34,816 received English Language Services.

<https://education.ky.gov/comm/edfacts/Pages/default.aspx?msclkid=bdaba191ab8211ecb84bdb80e3ffd219>. Given the continued increases in Kentucky's Immigrant population, this number is likely to be significantly higher during the period covered by this Implementation Plan.

- B.** Description of the methods used to identify underserved populations within the State and the results of those methods, including demographic data on the distribution of underserved populations within the State. (34 U.S.C. 10446(i)(2)(E); 28 C.F.R. 90.12(e)).

Based on the information gathered from the VAWA STOP State administrator's support network, as well as members of the IPC and other multi-disciplinary and/or collaborative partnerships, existing information from the U.S. Census and other government entities, several areas of unserved, undeserved, and inadequately served populations were identified. These include:

- Persons with one or more disabilities
- Documented and undocumented immigrants and refugees
- Victims of human trafficking
- Victims of sexual assault on a campus (higher education settings)
- LGBTQI victims
- Victimized elders
- Native American victims
- People who are deaf/hard of hearing
- Geographically isolated individuals
- Those who are affected by rural/urban poverty
- People of color
- Those who have been victimized prior to reaching adulthood
- Individuals who are incarcerated or under the supervision of federal, state, or local corrections or juvenile justice entities
- Spouses and children of combat veterans
- Individuals from traditionally marginalized religious communities.

Given Kentucky's intent to ensure meaningful access to services for all victims of domestic violence, dating violence, sexual assault, and stalking, it is important to understand that individuals may occupy one or more identities concurrently, and that, based upon the interaction(s) and intersectionality of a variety of individual-level,

societal, cultural, and other factors, these identities may be viewed as more or less important within the course of contact with service providers. It is, however, difficult to gain accurate data regarding the number and distribution of unserved/underserved victims within the Commonwealth, but the KJPSC continues to work towards this end in a variety of ways with the 2020 U.S. Census and other data referenced above as a starting place. Additional information used to gather information regarding unserved, underserved and culturally specific populations and their distribution throughout the Commonwealth was found in the services provided in Kentucky by federally funded victim service providers and the regional, state designated domestic violence and sexual assault programs.

During CY 2020, Violence Against Women Act (VAWA) funded subrecipients provided services to 3483 victims. 516 reported having one or more disabilities, 353 reported limited English proficiency, 20 reported being deaf or hard of hearing, 372 identified as being immigrants, refugees, or asylum seekers, 1734 reported being from a rural geographic area and 99 identified as LGBTQ. 918 or 26% identified as a member of an ethnic or racial minority with the largest group being black/African American at 13% followed by Hispanic or Latino/Latina at 11%. 5% of victims served were 60 years of age or older and 13% were male.

For FFY 2020, Victims of Crime Act (VOCA) funded subrecipients reported that among new victims served, 11,978 victims reported having one or more disabilities, 3,215 victims reported limited English proficiency, 389 reported being deaf or hard of hearing, 4,158 identified as immigrants, refugees, and asylum seekers, 1,649 victims identified as LGBTQ, 683 were veterans, 9,498 victims reported being homeless, and 9,515 identified as being from other underserved populations. Overall, 17,311 or 20% of new victims served identified as being a member of an ethnic or racial minority with the largest group represented being black/African American at 14.4%. 20,792 victims were under 18, almost 25% of new victims served. Of those under 18 who were provided services, 8% were between 13 and 17. 5% of new victims served reported being 60 years of age or older. 1649 new victims seeking services identified as LGBTQ and 22% were male.

Kentucky's regional, state designated rape crisis centers provided 4,402 services to primary and 956 services to secondary victims in SFY 2021. Of those receiving services, 676 were male and 66 identified as non-binary or trans. 208 were black/African American, 123 were Hispanic or Latino/Latina, and 17 were Asian. 11 victims seeking services identified as Deaf/hard of hearing, 345 were homeless, 60 identified as Immigrant/Refugee/Asylum Seeker, 228 identified as LGBTQ+, 570 had a disability, 38 had limited English proficiency or no English, and 2,652 were from rural communities.

Kentucky's regional, state designated domestic violence programs/shelters sheltered 1897 women and 61 men in FFY 2021. They provided an additional 11,029 women with non-shelter supportive services. Supportive services were also provided to the following:

Population Served	Number of Services Provided
Black/African American	1723
Hispanic	693
Interpretation/Language Services	374
LGBTQ	400
Dating Violence (ages 13 – 17)	21
Male	1203

Based upon the data available, the “underserved” populations Kentucky’s victim service providers most often provide services are those from rural areas, those who have disabilities, those who are male, and those who are non-White. VAWA funded service providers identified common barriers to victims’ ability to access services as including: the COVID – 19 pandemic and the barriers that came with it including inability to do outreach to increase awareness of services and lack of access to the technology needed to participate in remote services; lack of transportation; geography/rural isolation; lack of accessible, affordable childcare; need for improved access to quality interpretation services; decreased availability of services due to funding cuts for programs, inability to attract or keep staff due to pay and lack of funds to expand services; and distrust of systems by those from other cultures. This information, along with other sources of data, can help with the planning and provision of services for those unserved, underserved and culturally specific populations identified above.

### III. Description of Planning Process

#### A. A brief description of the planning process.

The IPC for the Kentucky VAWA STOP grant program is a multidisciplinary advisory body. Information was gathered from members of the IPC that aided in the development of the plan and identification of funding goals and priorities. Stakeholders from across the Commonwealth of Kentucky volunteered to participate, and steps were taken to ensure that a diverse group of experts and stakeholders were invited to participate in the 2022 – 2026 Implementation Planning (IP) process. Victims/Survivors, non-profit service providers, representatives of government agencies who work with victims/survivors of sexual assault, domestic/dating violence and stalking, and members who identified as being from unserved and underserved populations were very involved in the process, and careful consideration was taken to ensure that all focus areas of the VAWA STOP grant were represented on the committee.

Due to the COVID-19 pandemic, all meetings were held virtually. The virtual format of the meetings not only allowed the committee to meet, discuss and plan in the safest possible environment but also allowed for active participation from members located throughout the state who otherwise would have been hindered from more active participation due to the distance to the meeting location in Frankfort. A total of six committee meetings were held prior to the initial draft of the state implementation plan. During these meetings, committee members worked to identify gaps, needs, priorities, and strategies of how to



best use VAWA STOP funds within the Commonwealth. As these were identified, experts in the identified area gave presentations at a following meeting to provide more information about the identified need or gap specifically within the Commonwealth and members were provided the opportunity to ask questions and further discuss the identified gap or need. A seventh meeting was held after the draft plan was distributed to committee members for review and input. This meeting provided an opportunity for members to thoroughly review, discuss and offer edits to the draft plan before it was finalized.

In addition to meetings of the Implementation Plan Committee, statewide needs were gathered for this plan in a variety of other ways. Strategic plans, needs assessments, annual reports, and other data from a variety of agencies and organizations who provide services or assistance to victims were also reviewed. These included the most recent state plans for the use of Rape Prevention Education (RPE) funds and Family Violence and Prevention Services Act (FVPSA) funds, the 2022 needs assessments recently completed by the Kentucky Coalition Against Domestic Violence (KCADV) and the Kentucky Administrative Office of the Courts (AOC) and the 2020 SAFE Act Report prepared by the Kentucky Association of Sexual Assault Programs (KASAP). Data from the VAWA funded programs and Victims of Crime Act funded programs from the past three years was also compiled and reviewed.

Additionally, the KJPSC GMD is actively involved in several multi-disciplinary planning groups which work on issues relevant to VAWA funding and priorities. KJPSC GMD provides oversight and planning of the State Victim Assistance Academy (SVAA), regularly attends and provides technical assistance to the Sexual Assault Response Team Advisory Committee (SART-AC), participates in Project SAFE – a multidisciplinary response that works to address issues related to disability and violence against women, the Kentucky Human Trafficking Task Force, the needs assessment workgroup of the KCADV, and Kentucky Refugee Ministries/Central Kentucky Resettlement Program Community Partners workgroup. Finally, KJPSC GMD has strong partnerships with the Kentucky Office of Claims and Appeals (crime victims’ compensation), KASAP (sexual assault coalition), KCADV (domestic violence coalition), the Kentucky Office of the Attorney General (prosecution and prosecution-based victim advocates), and the military – Kentucky Army National Guard SAPR and Ft. Knox SHARP Program.

- B.** Documentation from each member of the planning committee as to their participation in the planning process. (34 U.S.C. 10446(i)(2)(B); 28 C.F.R. 90.12(b)(7)).

Documentation from each member of the planning committee as to their participation in the planning process is provided in the attachments section of this document. Kentucky’s planning committee included each of the agencies/populations required – and many others- except as indicated below.

1. State sexual assault coalition
2. State domestic violence coalition
3. Dual domestic violence and sexual assault coalition N/A

4. Law enforcement entity or State law enforcement organization
5. Prosecution entity or State prosecution organization
6. A court or the State Administrative Office of the Courts
7. Representatives from tribes, tribal organizations, or tribal coalitions N/A
8. Population specific organizations representing the most significant underserved populations and culturally specific populations in the State other than tribes (which are addressed separately)
9. Other if relevant (including survivors, probation, parole, etc.)

A chart is attached listing the formal membership of the IPC and their affiliations. The formal membership of the IPC includes victims/survivors of both sexual assault and domestic violence; several victim advocates/service providers – system and non-profit based, rural and urban based; members or representatives of unserved and underserved and culturally specific groups; prosecutors – felony and misdemeanor; law enforcement; probation and parole; crime victims’ compensation; military; civil attorneys; and medical professionals, among others. Other professionals and experts were consulted, formally and informally, throughout the planning process.

Kentucky does not have any Federally or State recognized Native American tribes. However, both an elected Commonwealth’s Attorney (felony prosecutor) and a professor from Western Kentucky University, both members of Native American tribes did participate on our committee as a way of bringing the voice of Native Americans to the committee.

- C.** A description of consultation with other collaboration partners not included in the planning committee (do not include tribes in this section. See “III. D” below for information on consulting and coordinating with tribes).

In addition to the required members of our IPC many others served on our planning committee or were otherwise consulted.

1. Sexual assault victim service providers. (34 U.S.C. 10446(c)(2)(H); 28 C.F.R. 90.12(b)(1)). Terri Crowe, a victim advocate at New Beginnings Sexual Assault Support Services served on the IPC as a representative of sexual assault victim service providers. New Beginnings is the state designated regional sexual assault program and serves the primarily rural counties of Daviess, Hancock, Henderson, McLean, Ohio, Union, and Webster. During the planning process Ms. Crowe left her position at New Beginnings. She was replaced both at New Beginnings and on the IPC with victim advocate Megan Gross.
2. Domestic violence victim service providers (34 U.S.C. 10446(c)(2)(H); 28 C.F.R. 90.12(b)(1)) Lisa Pitman, a long-time victim advocate at Bethany House Domestic Abuse Shelter, served on the IPC as a representative of domestic violence victim service providers. Bethany House is the state designated regional domestic violence program that serves ten primarily rural counties in south central Kentucky.

3. Population specific organizations, representatives from underserved populations, and culturally specific organizations. (34 U.S.C. 10446(c)(2)(G); 28 C.F.R. 90.12(b)(2))

- a. How the State selected and meaningfully consulted with the included organizations.

We meaningfully consulted with representatives of underserved populations and culturally specific organizations by including representatives of these populations on our IPC. The selected representatives are well known within the victim services community in the state for their work on issues related to crime victim services and assistance, their work on behalf of the specific populations they represented on the committee and the intersection of these. We also work and consult with many of members of unserved and underserved populations through our daily work responsibilities and activities including the many multidisciplinary groups on which we serve with them.

Representatives of underserved and culturally specific populations included Raymond Shields (LGBTQ/sexual orientation/gender), Paul Troy (elderly), Alexis Williams and Sabrina Farris (African American); Charles Lay (military/male victims); Annel Lough (military); Lisa Pitman, Terri Crowe, and Megan Gross (rural); Beth Metzger (disabilities/deaf/hard of hearing); Derek Feldman (Immigrant/Refugees); Shannon Butrum (correctional settings); Lou Anna Red Corn and Donielle Lovell (Native American); and Karina Barillas/LaCasita Center (Hispanic/Latino/LEP).

- b. how the State considered both demographics and barriers/historical lack of access to services for each population.

Kentucky considered both demographics and barriers/historical lack of access to services for the various unserved, underserved and culturally specific populations by reviewing available, relevant data and by ensuring that representatives of un/underserved populations were represented and had a voice on the IPC as it developed the Commonwealth's implementation plan.

**D.** Information on any others that were consulted but not part of the planning committee.

As mentioned above, in addition to our formal meetings with our IPC, information and input was collected informally through our normal, everyday conversations and networking with representatives of a wide variety of agencies and organizations that provide services and assistance to or otherwise work with victims/survivors of sexual assault, dating/domestic violence, and stalking including, but not limited to, our VAWA and VOCA subrecipients.

Also, in addition to our committee members, we specifically consulted with the following individuals due to their expertise and Kentucky-specific knowledge related to gaps, needs, and priorities identified during our IP committee meetings. These individuals include Teri Faragher, OutrageUs; Dr. T.K. Logan, University of Kentucky; Serenda LoBue, KASAP; Amanda Corzine, University of Louisville; Sara Manning, Baptist Health Elizabethtown; Angela Wallace, Lexington Police Department; Amanda Young, Kentucky Legal Aid; Rebecca Sim, Catholic Charities; Diane Fleet, GreenHouse 17; Katie Mooney, The Nest; Leah Engle, Kentucky Equal Justice; Darlene Thomas, GreenHouse 17; and Hunter Hickman, The Nest.

- E.** Consultation and coordination with tribes (34 U.S.C. 10446(c)(2)(F); 28 C.F.R. 90.12(b)(3) and (c)(2)(iii))

As noted earlier, Kentucky does not have any Federally or State recognized Native American tribes. We were made aware that there might be a tribe in South Central Kentucky and attempted to make contact through an IPC member. Unfortunately, those efforts were unsuccessful. This was consistent with the past efforts of KJPSC GMD to reach out to tribes or individual tribal members which were also unsuccessful. However, through efforts of IPC members, both an elected Commonwealth's Attorney and a professor from Western Kentucky University, both Native American, were identified and agreed to participate on our IPC. This allowed us to bring the voice of Native Americans to the committee and planning process even though we were unable to actual identify a tribe or tribal representative. Both brought much insight to the committee not only through their status with Native American tribes but through their professional work as well. Short bios for each can be found at the following links  
<http://www.lexingtonprosecutor.com/LRC/> and  
[https://www.wku.edu/regionalcampuses/etown-ftknox/staff/donielle\\_lovell](https://www.wku.edu/regionalcampuses/etown-ftknox/staff/donielle_lovell).

- F.** A summary of major concerns that were raised during the planning process and how they were addressed or why they were not addressed, which should be sent to the planning committee along with any draft implementation plan and the final plan. (28 C.F.R. 90.12(c)(2)(i))

The IPC quickly settled on their major concerns, priorities, and goals. These concerns included (1) continuing and enhancing our efforts to provide meaningful access to and non-discriminatory, accessible, culturally appropriate services for all victims including those from unserved and underserved populations and culturally specific communities, (2) increasing access to quality, affordable and culturally competent legal services, (3) increasing access to medical-forensic examinations by specially trained forensic examiners for victims of domestic/dating violence, strangulation and sexual assault, with no charge to the victim/survivor, and (4) reducing the number of domestic violence-related homicides. See attachment – Summary of Major Concerns and Issues Raised.

Because some of the language and terms used in this plan have become operationalized by subrecipient agencies we define them below for purposes of clarity.

- Meaningful Access includes the following elements to provide for non-discrimination in the provision of services:
  1. Notice: It is important for the agency to let underserved and culturally specific populations know that the services and accommodations of a grantee are available and free of charge. Examples of notice include: posting signs in intake areas and other entry points; stating availability of services and accommodations during intake process and on outreach documents; working with community-based organizations and stakeholders to inform underserved and culturally specific populations of the services and accommodations the subrecipient provides; public awareness campaigns through traditional media; and posting of notice in digital media such as social media and websites.
  2. Investment in developing policy and procedure: Subrecipients have sufficient and substantive policies and procedures including a listing of the components of Meaningful Access that establish the following: 1) all staff, including management, know and understand the policies and procedures, 2) the expectation that all staff serve all persons, 3) staff will work effectively to provide non-discriminatory services, 4) staff in management and/or leadership roles, whether or not they provide direct services, should be fully aware of and understand the plan so that they can reinforce its importance and support its implementation. Examples of policies and procedures include Limited English Persons and Language Access Plans, Meaningful Access Plans, Policies and Procedures regarding service and support animals, and Policies and Procedures regarding supporting services for victims with substance use disorder.
  3. Availability of relevant documents and materials: Any document that a victim needs in order to participate in an a subrecipient's program or to receive services from that subrecipient should be available, accessible, and understandable to victims. Examples include: publicly posted and translated consent, complaint, and grievance forms; intake forms; written notices of rights, denial, loss, or decrease in benefits or services, parole, and other hearings; notices of disciplinary action; notices advising persons of assistance and accommodations; rules and regulations; applications to participate in a subrecipient's program or activity or to receive subrecipient's benefits or services; and trauma informed signage and representation.
  4. Periodic training and monitoring: Staff should know their obligations to provide meaningful access. Subrecipients should develop a process for determining on an ongoing basis how to train staff, how to assess their implementation of meaningful access and what new documents, programs, services, and activities need to be developed. Examples include: trainings on meaningful access, including providing services to underserved and culturally specific populations; and internal inventories or scorecards regarding policy updates both to prioritize policies for updates and to document progress towards implementing meaningful access.
  5. Provision of skilled staff: Subrecipients should invest in staff that are skilled in the provision on meaningful access and cultural competency; staff that

practice trauma informed services; staff who are representative of populations served, including underserved and culturally specific populations; and in the continued health, wellbeing, and development of staff.

Meaningful access is not inherent to culturally specific programs, nor is it predicated solely upon cultural specificity. It is a framework for both culturally specific and mainstream programs to utilize for the provision of non-discriminatory services. Meaningful access embraces the concept that victims have simultaneously occurring and multi-faceted to their identities and that programs and services, in order adhere to non-discriminatory practices, receive victims as whole people without jeopardizing or compromising any aspect of their identity.

- Cultural competency means “the ability of an individual or organization to interact effectively with people of different cultures. This includes drawing on knowledge of culturally-based values, traditions, customs, language, and behavior to plan, implement, and evaluate service activities.” - OVC Model Standards for Serving Victims and Survivors of Crime.
- Accessible as used in this document includes linguistically and culturally accessible services as well as physical and attitudinal accessibility of services for those with disabilities and other special needs.

Additional concerns that were discussed included more priority given to services and assistance to stalking victims and to investigating and prosecuting stalking cases, increasing the number of Sexual Assault Response Teams (SARTs) and hospitals that perform forensic examinations, and identifying alternatives to the criminal justice system as a way for victims to achieve justice.

Although little further discussion was had in IPC meetings regarding the concern of giving more priority to the issue of stalking, stalking is incorporated into this plan as a goal; due to the strong connection between stalking and intimate partner violence including homicide and the need for improvement and expansion of stalking specific services and resources in Kentucky as brought to the attention of KJPSC GMD by members of the IPC on occasions outside of the regular planning meetings. See *Stalking and Intimate Partner Violence Fact Sheet*, Stalking Prevention, Awareness and Resource Center (2018). A recent Needs Assessment by the Kentucky AOC found a need for additional training and education on stalking and related issues and the importance of and need for improved community coordinated responses. See Kentucky AOC, *2020 Violence Against Women Act Statewide Needs Assessment Findings and Recommendations Report* (2022). A VAWA funded prosecutor-based program director recently stated in an annual report “services for victims of stalking can be improved. In cases where a victim is being stalked, the proof requirement in Kentucky to obtain a criminal conviction for stalking is substantial. Furthermore, the investigative tools available to law enforcement in misdemeanor stalking cases are limited. In Kentucky, there is no administrative subpoena or law enforcement subpoena at the investigative phase. Without early and

consistent police involvement, many victims are unable to document and prove that their perpetrators are responsible for stalking them by the criminal standard of proof.”

The issues of increasing the number of SART Teams and hospitals performing exams will be addressed in conjunction with the identified priority of greater access to forensic-medical examinations due to the close relationship between these issues and the broad discussion that was had around the need for greater access to not only forensic-medical examinations but also the associated programs and services necessary to better meet the needs of sexual assault victims.

The concern raised regarding identifying alternatives to the criminal justice system as a way for victims to achieve justice did not generate discussion either at the meeting at which it was initially raised or at subsequent meetings and was therefore, not addressed in the initial draft of the plan. However, it was provided to the IPC in the “Summary of Major Concerns and Issues Raise” document. KCADV contacted the VAWA Program Administrator the day before our last scheduled IPC, to share their suggested edits to the draft document including specifically expressing their desire to see this concern included as a priority within the draft plan. KCADV was permitted to address the full committee about their concerns with the plan as drafted generally and specifically about the decision not to include identifying alternatives to the criminal justice system as a priority in the final plan. Subsequent to the IPC meeting, KCADV also provided the Program Administrator with detailed suggestions for edits to the plan. KJPSC GMD has incorporated many of those suggested edits into the final plan. KJPSC GMD has decided that at this time the best way to further address the concern of identifying alternatives to the criminal justice system is for the IPC to continue to study the issue, identify allowable and achievable objectives and performance measures and amend the plan to include this as a priority should that become the consensus of the IPC at a future date.

- G.** A description of how the State coordinated this plan with the State plan for the Family Violence Prevention and Services Act and the programs under the Victims of Crime Act and section 393A of the Public Health Service Act (Rape Prevention Education), including the impact of that coordination on the contents of the plan. (34 U.S.C. 10446(c)(3); 28 C.F.R. 90.12(b)(6) and (g)(6)).

The program administrator from Kentucky’s Cabinet for Health and Family Services (KCHFS) who oversees Kentucky’s Family Violence Prevention and Services Act (FVPSA) funds served on our implementation committee and provided the most recent state plan for review and consideration by the committee. Kentucky’s FVPSA funds are passed through to KCADV and, beginning FY22, through KASAP as well. From there funds are distributed to the various domestic violence programs/shelters and Rape Crisis Centers across the Commonwealth for program implementation. Both KCADV and KASAP were also represented on the IPC.

According to the most recent FVPSA state plan, staff from the KCHFS, KCADV and the KJPSC worked together to have the current FVPSA and VAWA Implementation plans mirror each other. The primary focus of both plans was “meaningful access.” The

VAWA IPC will continue to prioritize meaningful access and the provision of non-discriminatory, accessible, and culturally competent services in the 2022 plan.

KJPSC GMD is the State Administering Agency (SAA) for VOCA funds as well as for VAWA funds. This puts us in the ideal situation to coordinate the funding priorities for both funding sources. VOCA program and financial administrators served on the IPC. Two-thirds of VAWA award recipients in the current year were also recipients of VOCA funding. Program administrators regularly discuss the work of the agencies funded by both sources to ensure collaboration and coordination of services provided and share similar funding priorities. VOCA, like VAWA, prioritizes funding for projects and agencies that provide non-discriminatory, accessible, culturally competent services, including meaningful access to services, for all victims. Currently, VOCA subawards fund legal services for victims/survivors, access to forensic examinations and programs specifically addressing the needs of unserved, underserved and culturally specific organizations consistent with the goals and priorities of the 2022 VAWA IP. Kentucky also uses VOCA Administrative funds to provide a state victim assistance academy (KVAA) for Kentucky's victim advocates and allied professionals. Through KVAA, the KJPSC GMD can and does prioritize instruction on topics that advance the goals and priorities of the VAWA IP.

Kentucky's Rape Prevention Education (RPE) funds are passed through from the KCHFS to KASAP, Kentucky's sexual assault coalition, for distribution to Kentucky's regional rape crisis centers/sexual assault programs throughout the state. Both the RPE program administrator from KCHFS and the prevention coordinator from KASAP served on the IPC. Although the state RPE plan focuses on prevention, which is not a primary priority for the use of VAWA funds, the Green Dot prevention program – a priority use of Kentucky's RPE funds, has been shown to impact the VAWA covered crimes of intimate partner violence and teen dating violence in addition to sexual assault. The VAWA priority of reducing domestic violence-related deaths will complement this RPE funding priority and the IPC and GMD staff will benefit greatly from the experience of, and lessons learned by those engaged in implementing Green Dot and other prevention programs as we move forward with implementing the 2022 – 2026 VAWA goals related to prevention and reduction of violence.

## IV. Documentation from Prosecution, Law Enforcement, Court, and Victim Services Programs

Documentation letters are provided in the attachments to this document.



# V. Plan for the Four-Year Implementation Period

This section should describe how the State will address the needs of sexual assault victims, domestic violence victims, dating violence victims, and stalking victims, as well as how the State will hold offenders who commit each of these crimes accountable. (28 C.F.R. 90.12(g)(3))

## A. Goals and Objectives

1. Concise description of the State’s goal and objectives for the implementation period. 28 C.F.R. 90.12(a)).

Goals/Priorities	Objectives	Performance Measures/Strategies
<p>Provide non-discriminatory, accessible, culturally appropriate services through meaningful access to all victims of sexual assault, dating/domestic violence and stalking including those from historically marginalized, unserved, and underserved, and inadequately served populations and culturally specific communities.</p>	<p>To require that all VAWA subrecipient agencies provide, at the time of application, a comprehensive limited-English proficiency plan.</p> <hr/> <p>To require that all VAWA subrecipient agencies provide, at the time of application, a comprehensive Meaningful Access Plan.</p> <p>—</p>	<p>All VAWA funded applicants will submit a LEP Plan with their applications. (Year 1 - 4)</p> <p>GMD will review applicant LEP plans annually at the time of application and refer funded applicants for technical assistance in revising their plans as appropriate/needed. (Year 1 - 4)</p> <hr/> <p>GMD will provide a tool kit and a training session on meaningful access and the development of meaningful access plans. (Year 2)</p> <p>All VAWA funded applicants will submit a Meaningful Access plan with their applications. (Year 3 - 4)</p> <p>GMD will review applicant Meaningful Access plans annually and refer funded applicants for technical assistance in revising their plans as appropriate/needed. (Year 3 - 4)</p>

	<p>To require all staff of VAWA subrecipient agencies receive at least two (2) hours of training during each grant year on meaningful access that may include providing culturally competent and/or accessible services, providing anti-oppressive and /or anti-racist services or a related topic.</p> <p>To require all VAWA subrecipients to report on efforts to provide and increase outreach and services to unserved and underserved and culturally specific communities, and efforts to recognize and address any gaps in services or other needs of these populations.</p> <p>To increase resource sharing among VAWA funded subrecipients.</p>	<p>GMD will include at least one individual with expertise in the subject of meaningful access to serve as a Subject Matter Expert during the application review process. (Year 3 – 4).</p> <p>All VAWA funded or match staff will report via their quarterly programmatic reports all qualifying training attended during the quarter. (Year 1 - 4)</p> <p>All VAWA funded agencies will report annually on the progress of their staff in meeting this training requirement via attachment to their fourth quarter programmatic report. (Year 1 -4)</p> <p>Subrecipients will report their efforts quarterly in <i>IGX</i> via the GMD provided programmatic report. (Year 1 - 4)</p> <p>All publications, forms, job aids, etc. developed by VAWA funded staff or with VAWA funds and designed to increase meaningful access; increase outreach to unserved or underserved populations; or provide more culturally competent and accessible services to unserved, underserved</p>
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	<p>To increase the number of funded projects or programs that specifically address the needs of a specified unserved, underserved or culturally specific population.</p>	<p>and culturally specific populations shall be provided to GMD quarterly through attachment to quarterly programmatic reports. (Year 1 - 4)</p> <p>GMD will distribute, at least quarterly, to all subrecipients resources and information received. (Year 2 - 4)</p> <p>The number of funded projects or programs that specifically address the needs of an identified unserved, underserved or culturally specific population will be increased as qualifying applications are received and funding availability allows. (Year 1 - 4)</p> <p>GMD will increase its efforts to identify and provide technical assistance to culturally specific organizations potentially interested in submitting an application for VAWA funding. (Year 1 - 4)</p> <p>One or more projects meeting the criteria for the culturally specific set aside will be identified and funded upon submission of a qualifying application. (Year 2 - 4)</p>
<p>Increased access to quality, affordable, and culturally competent, legal services for victims of sexual assault, dating/domestic violence, and stalking who cannot afford to</p>	<p>To conduct a needs assessment to identify gaps and needs in legal services, develop, and implement a strategic plan for addressing the identified needs, and fund projects and programs to better meet the identified needs.</p>	<p>Continue to fund projects or programs that increase access to quality, affordable, culturally competent legal services. (Year 1 - 3)</p> <p>A needs assessment will be conducted and completed. (Year 1 and 2)</p>

<p>access these services through private counsel.</p>		<p>A diverse group of projects will be funded to better meet the need for quality, affordable legal services consistent with the needs assessment and strategic plan. (Year 4)</p>
<p>Increased use of community coordinated, multidisciplinary responses to dating/domestic violence, sexual assault and stalking which focus on including and improving the medical component of the response.</p>	<p>To increase access to medical-forensic examinations by Sexual Assault Nurse Examiners (SANEs) and other trained forensic examiners.</p> <hr/> <p>To expand the availability and use of SARTs and other community coordinated, multidisciplinary response teams.</p>	<p>A minimum of two (2) programs will be funded to provide no cost medical-forensic examinations for victims of sexual assault, domestic/dating violence, and/or stalking. (Year 1 - 4).</p> <p>A minimum of (1) project will be funded that increases the numbers and availability of SANEs or other qualified forensic examiners. (Year 2 - 4)</p> <hr/> <p>A minimum of two (2) programs or projects will be funded that increase the use of SARTs or other multidisciplinary, community coordinated responses that prioritize the inclusion of qualified forensic examiners in the community's response to sexual assault, dating/domestic violence and/or stalking. (Year 1 - 4)</p> <p>VAWA funded prosecutorial and law enforcement agencies will be required to participate on or support any SART teams or other community coordinated responses to sexual assault, dating/domestic violence or stalking within their jurisdiction and if none exists, to initiate discussion and efforts to</p>

		implement at least one such team within the community served. (Year 1 - 4)
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2. Description of how STOP funding will be used to meet the State’s goal and objectives

Priority for use of STOP funding will be given to those proposed projects that advance one or more of the four goals identified through our planning and listed above and the statutory priority area goal of reducing domestic violence related homicides within the Commonwealth. Unless unanticipated significant increases in federal awards should occur, we will need to slowly transition to funding the priority areas so that existing VAWA funded programs can be sustained for a period of time to allow transition of those programs to other funding sources. Our continued shift to our goal of providing meaningful access, accessible and culturally appropriate services, however, will not necessarily require the expenditure of funding for “separate” resources and programs but will provide an opportunity for all funded programs to increase their knowledge and confidence in providing services that meet the complex needs of all service recipients including those from underserved, unserved and culturally specific populations. If cuts to current programs became necessary in order to fund new programs or projects that better advance the new goals and priorities, preservation of direct services will be prioritized to the greatest extent possible.

3. A description of how the funds will be distributed across the law enforcement, prosecution, courts, victim services, and discretionary allocation categories. (See 34 U.S.C. 10446(c)(4)).

Funds will be distributed across law enforcement, prosecution, courts, victim services, and discretionary allocation categories as follows:

- Law enforcement: at least 25%
- Prosecution: at least 25%
- Victim services: at least 30%
- Courts: at least 5%.
- Discretionary funds, which constitute 15% of the total allocation, will be used for multidisciplinary projects that do not fit into another category. They will also be used for other categories in situations where allocated funds are not sufficient to both ensure continuity of services and to ensure an increasingly equitable distribution of funds throughout the Commonwealth.

The KJPSC continues to ensure that at least 20% of STOP funds are set aside for sexual assault specific projects. We also continue to work to identify qualifying culturally specific organizations, meet with them and provide technical assistance in hopes of generating applications that, if funded, would aid us in meeting the culturally specific set-aside requirements. Meeting this set aside has not been difficult for us to achieve.

**B. Statutory Priority Areas**

1. Information on how the State plans to meet the sexual assault set-aside, including

how the State will ensure the funds are allocated for programs or projects in two or more allocations (law enforcement, prosecution, victim services, and courts). (34 U.S.C. 10446(c)(5)).

In 2021, the KJPSC received \$2,202,526 in STOP funds. These were distributed to 30 programs. Of the total amount, \$540,052 has been sub-awarded to six sexual assault related programs or projects in the victim services, law enforcement, and discretionary categories. The KJPSC continues to ensure that at least 20% of STOP funds are set aside for sexual assault specific projects.

2. Goals and objectives for reducing domestic violence-related homicides within the State, including available statistics on the rates of domestic violence homicide within the State and challenges specific to the State and how the plan can overcome them. (34 U.S.C. 10446(i)(2)(G); 28 C.F.R. 90.12(f)).

<b>Goals/Priorities</b>	<b>Objectives</b>	<b>Performance Measures/Strategies</b>
<p>Reduce the number of domestic violence-related homicides in Kentucky.</p>	<p>To support the use of evidence-based risk reduction tools and interventions.</p>	<p>An evidence-based lethality assessment tool or other risk reduction intervention will be implemented and/or expanded in a minimum of two (2) agencies/jurisdictions. (Year 2)</p> <p>An evidence-based lethality assessment tool or other risk reduction intervention will be implemented and/or expanded in at least two (2) additional agencies. (Year 4)</p> <p>Training will be provided for all STOP funded victim advocates and law enforcement officers on the use of risk assessment tools and/or other evidence-based interventions to reduce the risk of fatality for domestic violence victims. (Year 2)</p> <p>All STOP funded law enforcement officers will use evidence-based risk assessment tools with dating/domestic violence, sexual assault, and stalking victims. (Year 4)</p> <p>All STOP funded victim advocates will use evidence-based risk assessment tools with dating/domestic violence, sexual assault, and stalking victims. (Year 4)</p> <p>An informational session on evidence-based programs for the management of high-risk offenders will be offered to interested agencies. (Year 3)</p> <p>An evidence-based program for the management of high-risk offenders will be implemented in a minimum of one (1) program. (Year 4)</p>



	<p>To increase outreach to victims in high-risk situations and awareness of available services.</p> <hr/> <p>To define the scope of the problem of domestic violence-related homicide in Kentucky and identify strategies that will reduce the number of domestic-violence related fatalities in the future.</p> <hr/> <p>To support training efforts for members of the judiciary, law enforcement, and prosecutors, on domestic violence and lethality.</p>	<p>Require all VAWA subrecipients to document, on their quarterly programmatic reports in <i>IGX</i>, all efforts to increase outreach to victims in high-risk situations and awareness of available services. (Year 1- 4)</p> <hr/> <p>To fund a program or project that compliments the work of Kentucky’s Statistical Analysis Center to define the scope of the problem of domestic violence homicides including identifying and recommending for implementation evidence-based strategies to reduce the number of domestic violence-related homicides. (Year 3)</p> <p>To support the implementation of one or more evidence-based strategies or interventions for reducing domestic violence-related homicides (Year 3 and 4)</p> <hr/> <p>STOP funded prosecutors and law enforcement officers will be required to attend, in person or virtually, and document on their quarterly programmatic report in <i>IGX</i>, a minimum of one (1) hour of training annually on a topic related to domestic violence, and lethality. (Year 1 – 4)</p> <p>AOC will identify or provide virtual or in person training opportunities on topics related to domestic violence, risk assessment and reduction and lethality for judges and court staff who interact with victims of domestic violence and document, on their fourth quarter programmatic report, any trainings offered an/or qualifying trainings identified; how judges and court staff were notified of the available training opportunities; the number judges and staff who attended training; the training attended by each judge</p>
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	<p>To support training efforts on lethality for victim assistance and service agencies providing legal advocacy and assistance to victims.</p>	<p>or staff member; and the length of the training attended by each. (Year 1 – 4)</p> <p>Fund a minimum of one (1) project to provide a comprehensive training on topics related to domestic violence, risk assessment and reduction, and lethality for judiciary, law enforcement, and/or prosecutors. (Year 2 or 3)</p> <p>STOP funded victim assistance and service agency staff will be attend and document on their quarterly programmatic report in <i>IGX</i>, a minimum of one (1) hour of training annually on a topic related to domestic violence, risk assessment and reduction, and lethality. (Year 1 – 4)</p> <p>Fund a minimum of one (1) project to provide a comprehensive training for those providing victim advocacy and assistance, including legal assistance and advocacy, on topics related to domestic violence, risk assessment and reduction, and lethality. (Year 2 or 3)</p>
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### **Statistics and Challenges:**

The last comprehensive review of domestic violence related homicides in Kentucky was conducted in 2014 and looked at deaths occurring in 2010. The study found 35 cases resulting in 40 deaths. [https://ag.ky.gov/pdf\\_news/DVFR%20book.pdf](https://ag.ky.gov/pdf_news/DVFR%20book.pdf). In September 2019, the Kentucky Violent Death Reporting System issued a report that found that 20.8% of Kentucky's homicide were intimate partner related. <https://kvdrrs.ky.gov/Documents/September%2019%20Infographic.pdf> More recent data is not available.

The biggest challenge to Kentucky in reducing domestic violence-related homicides has been the lack of a central data collection system and the resulting lack of data. <https://amp.kentucky.com/opinion/linda-blackford/article258963868.html>. This challenge has been significantly reduced with the passage of 22 SB 271 by the Kentucky General Assembly in mid-April 2022. As of mid-July 2022, Kentucky's Criminal Justice Statistic Analysis Center will begin receiving a variety of mandated data from service providers, law enforcement, coroners, and other professionals necessary to accurately documenting the extent of domestic violence related deaths in Kentucky and will produce an annual report by January 1 of each year. The priorities set by the IPC will complement the process set in place by this new legislation.

### **C. Addressing the Needs of Underserved Victims**

Description of how the State will recognize and meaningfully respond to the needs of underserved populations as identified above in II.B. (34 U.S.C. 10446(e)(2)(D) and (i)(2)(F); 28 C.F.R. 90.12(d)(4)).

1. Description of how the State plans to meet the needs of the identified underserved populations, including, but not limited to, culturally specific populations, victims who are underserved because of sexual orientation or gender identity, and victims with limited English proficiency. (34 U.S.C. 10446(i)(2)(E); 28 C.F.R. 90.12(e))

Kentucky's legislatively adopted approach to providing domestic violence and sexual assault services is through a regional, state-funded model. (Charts of the state funded regions/area development districts, and the geographic areas they served provided in the attachments section of this document). Domestic violence and sexual assault programs are designated within each region or Area Development District and are, as a result, strategically located to serve the geographically, racially, and ethnically diverse population of Kentucky, and provide comprehensive, non-discriminatory, accessible, and culturally appropriate services within the region. Designated programs are required to be the primary service provider in their region and are designed to meet the unique needs of the region. Through this model, state general funds designated to provide these services are allocated and utilized efficiently and the availability of services is not dependent on each individual community developing and sustaining their own programs and services. These regional programs, work hard to provide accessible, non-discriminatory, culturally competent services for all victims, and some, with the assistance of funding from the Kentucky Justice and

Public Safety Cabinet, have established specific programs or designated specific personnel that specialize in providing services to underserved populations, including culturally specific populations.

All designated programs are members of either the state domestic violence coalition (KCADV) and/or the sexual assault coalition (KASAP). The coalitions have, for many years, prioritized meaningful access and the provision of non-discriminatory, accessible, and culturally competent services at all designated programs. The coalitions monitor the services being provided and provide training and technical assistance, as needed, to meet these goals. All fifteen domestic violence coalition member programs have Meaningful Access policies specifically designed to provide for non-discriminatory service provision to underserved populations in addition to Limited English Proficiency Plans that account specifically for Language access. Kentucky's sexual assault coalition has worked for several years to imbed the practices of meaningful access, language access, anti-oppression, and anti-racism into the culture of the coalition and member programs. These practices are now the expectation for all member programs. KASAP has also established two coalition positions that exist to assure that all programs have the education, resources and technical assistance opportunities that enable them to better serve ALL victims of sexual violence in the Commonwealth. The Advocacy Specialist supports KASAP's efforts to understand and react to sexual violence through an anti-oppression framework and the Access Healing Coordinator addresses targeted outreach and awareness to survivors who also have experience with substance use and works to improve the access to services for historically marginalized communities.

While this structure achieves maximum benefit from limited state funds and assures that all victims/survivors, regardless of where they reside throughout the state, have access to consistent, quality services, it presents a challenge to establishing and maintaining culturally specific programs and programs designed specifically to meet the needs of a specific unserved, underserved or culturally specific population.

To address this challenge, Kentucky has:

- (1) Initiated the use of a meaningful access framework through which all applications are evaluated, and programs delivered in addition to the traditional requirement of demonstrating need for the proposed program. This approach helps ensure that all funded programs are implemented in a manner that keeps the needs of unserved, underserved and culturally specific populations in the forefront and are located in areas where the greatest need is demonstrated; and
- (2) Prioritized funding programs that are specifically designed to provide meaningful access to and non-discriminatory, accessible, and culturally competent services for specifically identified unserved, underserved or culturally appropriate populations.

All KJPSC funded programs have been required, with the implementation of the 2017 VAWA Plan, to work toward having all staff trained and prepared to provide

meaningful access and accessible, culturally competent services for all those seeking services and assistance. This funding priority will be continued in the 2022 – 2026 Implementation Plan and will allow Kentucky to continue our very successful progress, to date, toward achieving this goal.

To support and ensure progress toward this goal by subrecipients, the KJPSC requires all applicants for VAWA and VOCA funding to submit Limited English Proficiency plans for providing services and collects information, through quarterly programmatic reports, as to outreach to and services being provided to unserved, underserved and culturally specific populations. KJPSC also provides both formal and informal training on meaningful access, non-discrimination, cultural competency, accessibility, etc. as opportunities are available and encourages subrecipients to seek out training on these very important topics as they meet their annual training requirements. Of course, we will also continue our efforts to identify one or more culturally specific organizations interested in applying for and receiving VAWA funds. We will also continue to fund, within established victim service agencies, designated staff, specially trained and qualified to meet the specific needs of one or more designated underserved and/or culturally specific populations as applications are received.

2. A description of how the State will ensure that monies set aside to fund culturally specific services and activities for underserved populations are distributed equitably among those populations. (34 U.S.C. 10446(e)(2)(D) and (i)(2)(F); 28 C.F.R. 90.12(d)(4))

When applications are received from agencies proposing to provide qualifying services each will be reviewed, through a meaningful access lens, by a panel of subject matter experts and KJPSC GMD staff taking into consideration factors such as the history of the agency in providing VAWA eligible or similar services, the applicant agency's ability to successfully administer the programmatic and financial aspects of the grant, the culturally specific or underserved population to be served, the demographics of the area to be served, other agencies or organizations in the region providing similar services to the same population and how funding of the application would help meet the goal of distribution of the services equitably among the regions of the state and among the various culturally specific and underserved populations.

3. Specifics on how the State plans to meet the set-aside for culturally specific community-based organizations, including a description of how the State will reach out to community-based organizations that provide linguistically and culturally specific services. This could include specific information as to which subgrantees met the required 10% set aside within the victim services allocation for culturally specific organizations during the prior funding cycle. (34 U.S.C. 10446(i)(2)(E); 28 C.F.R. 90.12(g)(2))

As noted above, Kentucky's demographics present a challenge to identifying culturally specific organizations either currently providing or which are interested in providing appropriate, VAWA eligible programming or services. Although we have leveraged the skills, knowledge, and professional networks of agencies like Kentucky

Refugee Ministries and La Casita Center and members of our IPC, and offered technical assistance to potentially qualifying agencies, we have still been unable to identify an agency that would meet the requirements of the VAWA set aside that is interested, at this time, in providing VAWA qualifying services.

We will continue to try to identify and reach out to agencies that could possibly meet the criteria for funding under the set aside and offer technical assistance. In the interim, we will continue to fund specialized services for underserved populations through some of our STOP funded agencies that do not meet the criteria to be designated culturally competent organizations. For example, Catholic Charities of Louisville provides immigration legal services to foreign national victims under the STOP award. Their outreach is developed to meet those who are most vulnerable due to their language, culture, and immigration status. Another funded agency with culturally specific programming is The Center for Women and Families, a dual domestic violence and sexual assault program. Their program assists immigrant victims who remain in shelter and need assistance to overcome barriers coinciding with their residency status. The Nest, has counselors, advocates, including a multi-lingual court advocate, and attorneys who are specially trained to work with immigrant and refugee populations and Barren River Area Safe Space, a domestic violence program, uses it's VAWA funds to employ a bilingual advocate.

For our current (2022) VAWA cycle, our efforts paid off. We received an application from a culturally specific organization, La Casita Center, and have funded a Latinx Victim Advocate position within that organization.

**D. Grant-making Strategy**

1. Timeline for the STOP grant cycle. (See 28 C.F.R. 90.12(g)(8)).

Press Release Goes Out	Mid-July
Solicitation/Application Available in <i>IGX</i> (6 weeks)	Early August
Applications Close	Mid-September
Review by GBD Staff and Subject Matter Experts	Mid-September to Early November
Funding Recommendations made to KJPSC Secretary and Governor for approval	Mid-November
Awards Approved by Cabinet Secretary and Governor	Early December
Award Notices Go Out	Early to Mid-December
Award Binders Are Signed by Subrecipients	Mid to Late December
Awards Begin	January 1
Individual Meetings with New Grantees	Early January
Quarter 1 Ends	March 31
*Quarter 1 Programmatic and Financial Reports Due in <i>IGX</i>	April 15

**On-Site Monitoring/** **Technical Assistance to New Grantees	Third Quarter: July - September
Quarter 2 Ends	June 30
Quarter 2 Programmatic and Financial Reports Due in <i>IGX</i>	July 15
Quarter 3 Ends	September 30
Quarter 3 Programmatic and Financial Reports Due in <i>IGX</i>	October 15
Project Ends	December 31
Annual/Muskie Reports sent to Subrecipients by e-mail	Early January
Quarter 4 Programmatic and Financial Reports Due in <i>IGX</i>	January 15
Subrecipient Annual/Muskie Reports due to GMD	Mid-February
Annual/Muskie Reports submitted to VAWAMEI and JustGrants	By March 30
<p><i>Notes:</i> *Subrecipients are given the option of either monthly or quarterly financial reporting  **Monitoring frequency and type - enhanced desk review or on-site- for subrecipients who receive continuation funding is completed consistent with the monitoring policy of GMD which considers several factors including the risk assessment of the funded program. Ongoing desk monitoring is also conducted for all subrecipients quarterly through review of programmatic and financial reports and related discussions.  ***Technical Assistance is available for all subrecipients throughout the grant award period upon request of the subrecipient or when determined to be appropriate/needed by the Program or Financial Administrator.</p>	

2. Description of how the State will ensure that eligible entities are aware of funding opportunities, including projects serving underserved populations. (28 C.F.R. 90.12(d)(5) and (g)(4))

Typically, potential applicants are made aware that KJPSC GMD is accepting applications using a variety of formats, including a press release, advertising the available funding on the KJPSC website, and an email blast to previous applicants and those registered in the *IGX* system. For VAWA funding opportunities, the press release will also be shared with members of IPC for distribution through their personal or agency distribution lists. We will also specifically target all culturally specific organizations that have been identified.

3. Description of how the State will ensure that any subgrantees will consult with victim service providers during the course of developing their grant applications in order to ensure that the proposed activities are designed to promote the safety, confidentiality, and economic independence of victims. (34 U.S.C. 10446(i)(2)(D))

Kentucky will include within its application a question and text box where all applicants, except for non-profit victim service providers, will be required to provide a narrative describing how they consulted with victim service providers during the course of developing their grant application. This will help to ensure that the proposed activities are designed to promote the safety, confidentiality, and economic independence of victims.

4. Description of how the State will identify and select applicants for subgrant funding, including whether a competitive process will be used. If different selection methods will be used for each allocation category, describe the method. (28 C.F.R. 90.12(g)(8))

The KJPSC GMD will continue to use a competitive process during the time period covered by this plan. However, in special circumstances, such as when a sufficient number of qualifying proposals are not submitted within a certain category of funding, such as culturally specific organizations or for prosecutor programs, one or more specific agencies or organizations may be approached about their interest in submitting an application.

**Application.** Applications may be obtained from the *Intelligrants 10.0 (IGX)* electronic grants management system, available through the KJPSC Grants Management Division's website, <https://justice.ky.gov/Departments-Agencies/GMD/Pages/intelligrants.aspx>. The *IGX* system provides access to an application form, program and financial guidelines and other pertinent information needed to prepare the application.

**Application procedure.** Applications for each program must be submitted via *IGX* within the required timeframe. VAWA STOP applications are generally available from August through mid-September, for a 6-week period.

**Application Content.** For an application to be accepted by the Grants Management Division as complete, the following material/information must be included.

- Complete agency and program overview information;
- Statement of the problem, goals, and objectives, project narrative. Performance indicators and prior project outcomes;
- Copy of the last completed audit of the applicant agency consistent with OMB Uniform Guidance on Administrative Requirements, Cost Principles, and Audit Requirements;
- Detailed project and budget narratives;
- Equal Employment Opportunity Certification;
- Debarment and Suspension Certification – (Subrecipients are not allowed to subcontract with any party which is debarred or suspended from participation in state or federal assistance programs);
- Lobbying Certification;
- Letters of support demonstrating collaboration with other service providers to increase the likelihood of project success;
- Drug-Free workplace Certification;
- Limited English Proficiency service provision plan (LEP) plan;
- Full description of strategies for ensuring meaningful access and non-discriminatory, culturally appropriate services and plans for outreach to unserved, underserved and culturally specific populations;
- Determination of Suitability for Interaction with Minors form;



- Policy for response to workplace-related incidents of sexual misconduct, domestic violence, and dating violence.
- STOP Purpose Areas supported by the proposed project;
- Implementation Plan Goals supported by the proposed project.

**Application Review Process.** When a completed application has been submitted, it undergoes programmatic and financial review and risk assessment by GMD financial and program administrators. Applications are also reviewed by other GMD staff with relevant backgrounds and by a diverse panel of subject matter experts using specific review criteria. KJPSC GMD no longer uses a review system that assigns point values but instead uses a recommended or not recommended approach.

Programmatic review of each application also considers the following:

- Eligibility of applicant;
- Eligibility of the project proposal;
- Allowability under a VAWA area purpose;
- Advancement of an Implementation Plan goal or priority;
- Extent of need for the project/program;
- Extent to which the project/program is equipped and willing to serve unserved, underserved and culturally specific populations;
- Measurable goals and objectives;
- The plan of operation;
- Qualification of key personnel; Financial review of each application considers the following:
  - Allowability in accordance with the current Federal Guide, Office of Justice Programs and other federal guidelines and requirements as applicable;
  - Allowability under a VAWA purpose area;
  - Allowability in accordance with Kentucky statutes and regulations;
  - Sufficiency and allowability of match;
  - Budget and cost effectiveness;
  - Adequacy of resources;
  - Evidence of financial stability and capability;
  - Past performance regarding timely submission and accuracy of financial reports;
  - Deobligation of funds in previous funding years; and
  - Whether the agency has met the OMB Uniform Guidance on Administration Requirements, Cost Principles, and Audit requirements when required, as well as the consideration of other factors, including but not limited to those outlined in 28 CFR Part 66, where applicable;

Upon final review of the application, GMD will recommend one of the following actions:

- Denial of the application;
- Approval of the application in whole; or
- Approval of the application in part.

KJPSC GMD provides funding recommendations, which are reviewed by the Cabinet's Executive Leadership and the Governor's Office. Upon approval, KJPSC GMD will proceed with notifying subrecipients in writing of the approval and the funding amount for the project period. Staff also process any required budget modifications. Upon conclusion of the application and award process, applicants may request a summary of reviewer comments. Requests must be sent to KJPSC GMD in writing.

5. Whether STOP subgrant projects will be funded on a multiple or single-year basis. (See 28 C.F.R. 90.12(g)(8))

Kentucky funds all VAWA subgrant projects on a single-year basis. The standard award period for VAWA STOP grants is from January 1 – December 31.

6. Description of how the State will determine the amount of subgrants based on the population and geographic area to be served. (34 U.S.C. 10446(e)(2)(B) and (i)(2)(F); 28 C.F.R. 90.12(d)(2))

The KJPSC GMD runs a competitive application process during which an applicant defines the problem to be addressed, including the size and scope of the problem in their area using the most current population and crime data available. Applications are asked to describe what other services are available to victims in their area or jurisdiction, and why those services are inadequate to meet the needs of victims. This information is used to help make a determination if, or what level of, funding should be awarded to an applicant.

KJPSC GMD retains discretion to approve, adjust, or deny an award based on a number of factors, including helping promote federal funding priorities, such as ensuring geographically equitable distribution of VAWA funds.

This process is complementary to the process used to distribute state victim service funds throughout the state. The state has designated service areas through which they fund victim, law enforcement and prosecution services in a manner which helps to ensure an equitable distribution of funds for basic services across the state based upon the population size and density in each geographic area. In selecting applications for funding we consider the state funded and designated service areas, - 15 area development districts for sexual assault and domestic violence programs, 16 state police posts for law enforcement and law enforcement based advocacy programs, 57 judicial circuits for prosecution and prosecution based advocacy services - and the services currently available within each of these areas and the need demonstrated in the application for the proposed additional or specialized services.

7. Description of how the State will give priority to areas of varying geographic size with the greatest showing of need based on the availability of existing domestic violence, dating violence, sexual assault and stalking programs. (34 U.S.C. 10446(e)(2)(A) and

(i)(2)(F); 28 C.F.R. 90.12(d)(1)).

As noted previously in this plan, Kentucky's approach to providing domestic violence and sexual assault services is through a regional, state-funded model. Domestic violence and sexual assault programs are designated within each region or Area Development District and are, as a result, strategically located to serve the geographically diverse population of Kentucky, and provide comprehensive, culturally appropriate services within the region. Designated programs are required to be the primary service provider in their region and are designed to meet the unique needs of the region. Through this model, state general funds designated to provide basic services are allocated equitably between the regional programs, utilized efficiently and the availability of services is not dependent on each individual community developing and sustaining their own programs and services. This model ensures that all victims have access to a similar array of basic victim assistance services, within a reasonable distance of their home, regardless of where they reside in the state.

Due to this state designed and implemented funding approach, VAWA funds, allocated through the competitive process including a demonstration of need, are typically utilized to fund supplemental or more specialized services that will fill service gaps and needs within the coverage area of an applicant program. Currently funded services, outside of the regional domestic violence and sexual assault programs, include access to legal services, forensic examinations, and multicultural staff. Going forward, priority will be given to funding services or projects that advance the goals and needs identified in this Implementation Plan. The geographic area served and the demonstrated need for the proposed services/program will be a primary consideration in determining which applications to fund.

8. Description of how the State will equitably distribute monies on a geographic basis including nonurban and rural areas of various geographic sizes. (34 U.S.C. 10446 (e)(2)(C) and (i)(2)(F); 28 C.F.R. 90.12(d)(3))

The regions or area development districts referenced above provide a preset formula for equitable distribution of funds throughout the state based on geography and population density. Using these same geographic and service areas to guide our award decisions along with the requirement of applicants to demonstrate the need for the proposed project during the application process, will help ensure not only equitable distribution of funds throughout the various geographic regions of the state but coordination with and nonduplication of state funded basic services. Charts of the state funded regions or area development districts and the geographic areas they served provided in the attachments section of this document.

9. Information on projects that the State plans to fund, if known. (28 C.F.R. § 90.12(g)(5))

Kentucky does not yet know what projects or programs it will fund. The STOP Solicitation/Application is expected to open in the *IGX* 10.0 system for a six-week period beginning in early August 2022.

Kentucky does not plan to address the Crystal Judson purpose area during the period covered by this Implementation Plan.

## VI. Conclusion

Kentucky's IPC was larger and more diverse than it had been previously, bringing to the table the perspective of a wide variety of professions and underserved populations. The IPC members were highly qualified, brought a wealth of knowledge to the table and openly shared their knowledge and concerns. Relationships were established that will continue to enhance the provision of services to victims of domestic/dating violence, sexual assault and stalking in Kentucky for years to come.

In Kentucky's 2017 Implementation Plan the primary goal was to increase meaningful access to services so that all agencies and organizations were prepared to provide accessible, culturally competent services to any victim/survivor who presented for assistance. Kentucky has made significant progress toward that goal. At a minimum, all VAWA funded programs must have an appropriate language access plan in place and all programs must report quarterly on the unserved and underserved victims that are served. Kentucky's sexual assault and domestic violence coalitions are working hard to educate their member programs and other victim service providers and allied professions on understanding the need for meaningful access and culturally competent services, what meaningful access and culturally competent services look like in practice and how to implement this practice in the daily work of individual agencies and organizations. The KJPSC, GMD holds meaningful access and the provision of culturally competent services and assistance as a highest priority, not just for its VAWA funded programs but across all grant funded programs and projects administered by KJPSC, GMD. Recognizing the importance of this goal and the work around it that still needs to be done, the IPC has decided to once again adopt meaningful access and the provision of accessible, culturally competent services as a funding priority for the years covered by this plan. Much work has been done in this area, but much work remains and will continue to be done toward this goal under this new implementation plan.

Additionally, this plan adopts increased access to quality, affordable, and culturally competent, legal services; increased use of community coordinated, multidisciplinary responses to dating/domestic violence, sexual assault and stalking which focus on including and improving the medical component of the response; and improvement of Kentucky's response to stalking as goals and funding priorities for the duration of this plan. This is also an ideal time for Kentucky to work toward the goal/priority of reducing domestic violence -related homicides. The IPC looked at this issue in depth throughout the planning process and developed objectives towards achieving this goal. Coincidentally, the Kentucky General Assembly passed, in April 2022, legislation that will greatly enhance the ability of the IPC to make progress toward this goal.

Consistent with past practice, Kentucky has not identified specific underserved populations on

which it will focus. Instead, it is our intention, as referenced above, that all funded agencies and organizations will identify the primary marginalized, unserved and underserved populations in their individual communities/jurisdictions served, provide outreach to these populations and prepare themselves to provide meaningful access and trauma-informed, accessible, culturally competent services to all who seek their assistance. GMD also plans to continue and increase its efforts to identify and reach out to one or more culturally specific organizations interested in applying for VAWA funding.

Finally, GMD plans to increase its efforts to ensure that progress is being made toward the goals and objectives of this plan. To assist us in these efforts, we will convene meetings of the IPC, at least biannually, to assess the progress made toward achievement of the goals/priorities and objectives of this plan and will modify our VAWA application to include requiring applicants to provide information as to how the proposed project or program will enhance one or more of the IP goals/priorities and objectives.