

TENNESSEE TITLE VI COMPLIANCE PROGRAM



REPORT TO GOVERNOR AND GENERAL ASSEMBLY
Reporting Period
FY July 1, 2011 - June 30, 2012

Issued by:

TENNESSEE HUMAN RIGHTS COMMISSION

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LETTER TO THE GOVERNOR AND GENERAL ASSEMBLY

September 24, 2012

The Honorable Bill Haslam
Governor State of Tennessee
Nashville, Tennessee 37243

Members of the General Assembly
State of Tennessee Legislative Plaza
Nashville, Tennessee 37243

Dear Governor Haslam and Members of the General Assembly:

Transmitted herewith is the Tennessee Title VI Compliance Program Annual Report. This report was prepared pursuant to the requirements of Section 4-21-203, *Tennessee Code Annotated* and covers the period of July 1, 2011 through June 30, 2012.

The Tennessee Human Rights Commission (Commission) is honored to be chosen as the central coordinating agency for Title VI compliance statewide. In our country's current climate of economic and fiscal challenges, compliance with federal laws and regulations is critical to maintaining necessary funding for programs and services throughout the state.

Since 2009, when Title VI monitoring authority was transferred to the Commission, we have worked diligently to develop guidelines, policy, rules and provide technical assistance and training to Title VI personnel statewide. This report provides a summary of the services and accomplishments of the Title VI Compliance Program. We will continue to ensure that each executive branch department and agency promotes present and future compliance with Title VI requirements.

Thank you for the opportunity to serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beverly L. Watts', written in a cursive style.

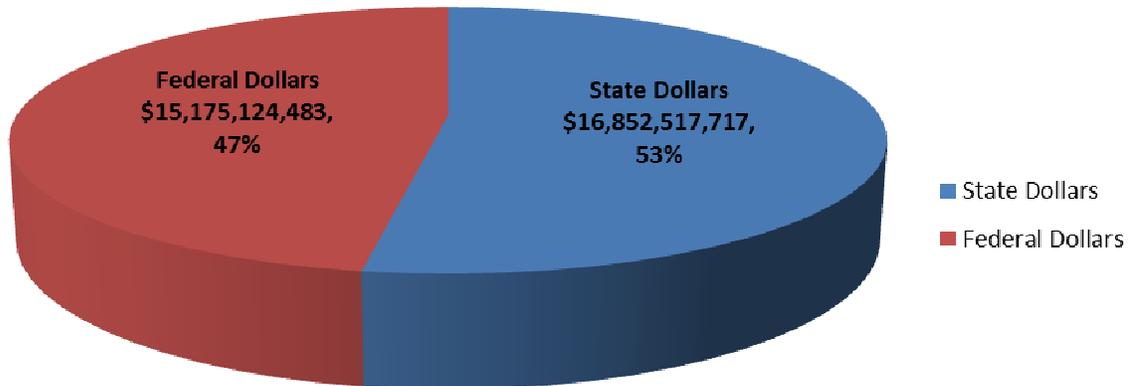
Beverly L. Watts
Executive Director

I. INTRODUCTION

This report covers Title VI Compliance Program activities during fiscal year (FY) July 1, 2011 - June 30, 2012 for compliance efforts and outcomes of each executive branch department and agency in the state of Tennessee. Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance (FFA). Federal financial assistance includes the following: 1) an award, contract or grant of money; 2) loans, below fair market value or subsidies; and 3) training.

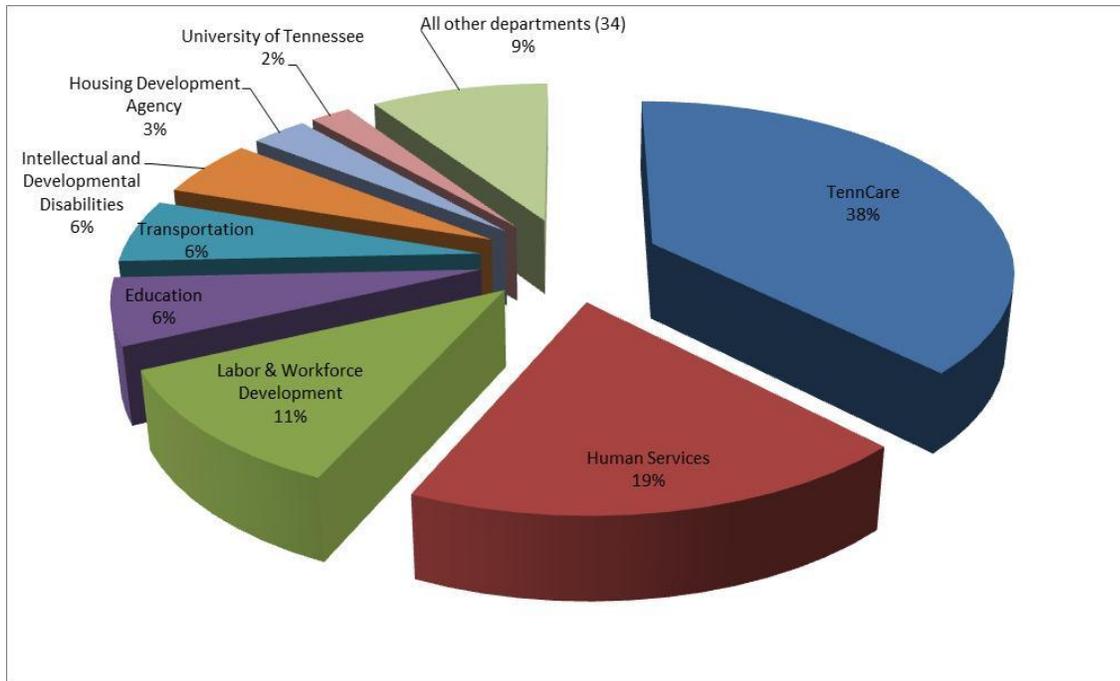
Title VI applies to any state department or agency that receives FFA. Examples of programs and activities covered by Title VI include food stamps, parks and recreation, child care, Medicaid, transportation, roads/highways and education. During FY July 1, 2010 - June 30, 2011, 41 executive branch departments reported the receipt of federal funds totaling \$ \$15,175,124,483 which represents 46%, or almost half, of Tennessee's 2010-2011 state budget of \$32,027,642,200 as cited by the Department of Finance and Administration in "The Budget: Fiscal Year 2011-2012+ (*Administration Amendment as Filed*)

TOTAL STATE BUDGET FY2010-2011



A comprehensive statewide compliance program prevents the risk of loss of federal funding due to discriminatory practices and is critical to maintaining high standards and ensuring continued compliance. Of the \$15.1 billion in federal funds, eight out of 42 departments account for approximately 90% of FFA in Tennessee, respectively: TennCare - 38%; Human Services - 19%; Labor and Workforce Development - 11%; Education - 6%; Transportation - 6%; Intellectual and Developmental Disabilities - 5%; Housing and Development Agency - 3%; University of Tennessee . 2%. The remaining 34 departments account for approximately 10% of total federal dollars received statewide.

TOP 8 DEPARTMENTS BASED ON AMOUNT OF FEDERAL DOLLARS RECEIVED



Department	Federal Dollars Rcvd'	Total % of Federal Dollars
TennCare	\$ 5,707,218,300.00	38%
Human Services	\$ 2,896,088,300.00	19%
Labor & Workforce Development	\$ 1,722,797,886.85	11%
Education	\$ 945,999,507.00	6%
Transportation	\$ 899,378,000.00	6%
DIDD	\$ 815,738,000.00	5%
THDA	\$ 446,902,473.00	3%
University of Tennessee	\$ 321,478,056.26	2%
All others (34 departments)	\$ 1,419,183,360.01	9%
TOTAL	\$ 15,175,124,483.12	100%

A. History, Purpose and Scope

On August 9, 2002, Governor Don Sundquist issued Executive Order 34 which created the Title VI Compliance Commission. Executive Order 34 assigned the duties and responsibilities for Title VI monitoring to the 13-member Title VI Compliance Commission. Governor Sundquist appointed nine of the 13 members as required by the executive order. All of these appointments expired in October 2008 and remained unfilled.

On June 23, 2009, Governor Phil Bredesen signed legislation transferring the duties of the Title VI Compliance Commission to the Tennessee Human Rights Commission, effective July 1, 2009. This legislation grants the Commission the authority to verify that all state governmental entities comply with the requirements of Title VI. This responsibility includes the establishment and development of guidelines for a comprehensive statewide policy to ensure compliance by the executive branch of state government. Under State of Tennessee Public Acts, known as the Tennessee Human Rights Act (Tenn. Code Ann. §4-21-203), the duties of the Tennessee Human Rights Commission (Commission) include but are not limited to:

- reviewing current Title VI monitoring and enforcement procedures as reflected by federal and state statutes, rules, regulations, programs, services, and budgetary priorities;
- defining and establishing the components, guidelines, and objectives of a comprehensive state policy to ensure and promote present and future compliance with Title VI requirements;
- serving as the central coordinating agency for executive branch departments and agencies for technical assistance, consultation, and resources to encourage and assist compliance with the requirements of Title VI;
- auditing, reviewing, evaluating and reporting periodically on Title VI compliance efforts and outcomes for each executive branch department and agency;
- investigating allegations of noncompliance with Title VI; and,
- reporting annually to the Governor and the Tennessee General Assembly concerning the Commission's activities, findings, and recommendations.

The initial goals and objectives of the Commission included the tasks of identifying a director for the Title VI Compliance Program, rulemaking, training and policy development. The Commission hired a director in November 2009 to carry out the duties and responsibilities of the Title VI Compliance Program. The next step was to develop rules and guidelines to establish a uniform approach that would assist executive branch departments in creating and maintaining effective compliance programs. This objective would be accomplished through the Department of State's rulemaking hearing process.

During the first year, the Commission created and developed proposed state rules and regulations by filing the Notice of Rulemaking Hearing with the Department of State and holding three public rulemaking hearings across the state in Nashville,

Knoxville and Jackson for public review and comment. The Commission appeared before the Tennessee General Assembly Government Operations Committee on January 24, 2011 concerning the proposed rules for the Title VI Compliance Program. The Government Operations Committee unanimously voted for Title VI Compliance Program Rules passage and granted an effective date of February 13, 2011.



B. Discriminatory Practices

Departments that receive FFA must provide the public with fair and equal access to all of its programs and activities in a nondiscriminatory manner. Specific discriminatory actions are prohibited under Title VI. A department that is a recipient of federal funds may not, directly or through contractual or other arrangements, on the basis of race, color or national origin:

- Deny an individual any disposition, service, financial aid, or benefit provided under the program;
- Provide any disposition, service, financial aid, or benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program;
- Subject an individual to segregation or separate treatment in any matter related to the receipt of any disposition, service, financial aid, or benefit under the program;
- Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any disposition, service, financial aid, or benefit under the program;
- Treat an individual differently from others in determining whether such person satisfies any admission, enrollment, quota, eligibility, membership, or other

- requirement or condition which individuals must meet in order to be provided any disposition, service, financial aid, function or benefit provided under the program;
- Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford such person an opportunity to do so which is different from that afforded others under the program; or,
 - Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

II. GOALS, OBJECTIVES & ACCOMPLISHMENTS

Implementation Plans

A major component of the Title VI Compliance Program involves implementation plan review. The Commission conducted training on July 13, 2011 for 68 Title VI personnel representing 37 departments concerning the duties and responsibilities of the Title VI Compliance Program, implementation plan guidelines and the obligation of executive branch departments to submit implementation plans to the Commission by October 1 annually. As a result of the training, the Commission established a LEP Working Group in October 2011. There were 12 departments represented and 18 attendees, including Tennessee Human Rights Commission Executive Team members and staff. This group will address challenges and share resources across executive branch departments to ensure that the public has meaningful access to programs and services statewide

The Commission received and reviewed 42 implementation plans from departments statewide. The review analyzed several areas of compliance, to include whether departments train staff on Title VI, Limited English Proficiency (LEP) policies and procedures, data collection and the monitoring of subrecipients. Implementation plans were forwarded back to the departments for revision after an initial review and comment phase. Upon completion of the implementation plan review process, the Commission issued a "Notice of Final Findings" to 42 departments. Findings and outcomes from the review are included in Section IV of this report.

Policy Guidance

The Commission has continued to accomplish its goals of providing ongoing policy guidance concerning compliance during the second year of the program. In addition to the implementation plan review, the Commission has established a process to monitor and provide guidance on the content of written correspondence to complainants when complaints are filed with the Commission and referred to another state department. The Commission has developed statewide policy guidance for executive branch departments on the following topics:

- Training of departmental staff on Title VI, to include "Required Topics for Training Under Title VI" (*May 2011*);

- Title VI prohibition against national origin discrimination affecting Limited English Proficient (LEP) persons, to include a sample LEP policy for internal use and modification where applicable (*June 2011*);
- Implementation Plan Guidelines to ensure that each department submits a plan that meets compliance standards (*July 2011*); and
- The 180-day filing deadline for Title VI Complaints (*August 2011*).

On-site Compliance Reviews

One of the responsibilities of the Tennessee Human Rights Commission ("Commission") is to verify that all state governmental entities comply with Title VI of the Civil Rights Act of 1964 ("Title VI"). According to the Tennessee Human Rights Act (Tenn. Code Ann. §4-21-203), the Commission is authorized to periodically and systematically audit, review, evaluate and report on Title VI compliance efforts and outcomes for each state department and agency. The on-site compliance reviews are conducted to determine the extent to which an agency or state entity is in compliance with Title VI as it relates to program objectives, complaint procedures and referral process, and the actual execution for processing complaints. This review also serves as a mechanism for the Commission to provide technical assistance and make recommendations regarding corrective action, where appropriate.

During this fiscal year THRC completed two On-Site Compliance Reviews. One of the on-site compliance reviews was conducted at the Tennessee Department of Correction, including the following facilities: Central Office, Morgan County Correctional Complex, Hardeman County Correctional Facility, and the Riverbend Maximum Security Institution. An on-site compliance review was also conducted at the Tennessee Wildlife Resource Agency's headquarters. Preliminary findings from the compliance reviews have been completed and are currently under review.

Investigations

One of the duties of the Commission is to investigate allegations of non-compliance with Title VI at state agencies and departments. In December 2011, the Title VI Compliance Program accepted for investigation a complaint against the Tennessee Arts Commission alleging intentional discrimination and unfairness and disparity in the funding and grants review process of the agency on the basis of race. The investigation has been completed and final findings are currently under review.

III. COMPLAINTS

Any person alleging discrimination on the basis of race, color or national origin under any program or activity receiving FFA must be filed within 180 days of the alleged discriminatory conduct. Complaints may be filed either with the Commission or directly with the department, or its subrecipient, that is responsible for the alleged discriminatory conduct. Any person may file a complaint directly with the federal department or agency that provides funding to any state department in Tennessee.

A. Complaints Received by the Commission: July 1, 2011 – June 30, 2012

During the period covering July 1, 2011 - June 30, 2012, the Title VI Compliance Program received 383 inquiries; 63 of the 383 inquiries were filed as complaints; 16 complaints were closed; and 47 complaints remained open. These 63 complaints were referred to 9 departments and agencies. Complaints ranged from allegations of discriminatory practices by state employees to the denial of services under specific, federally funded programs and activities.

Complaints that may be jurisdictional under Title VI are typically referred to the executive branch department that administers the program or activity referenced in the complaint. All departments must inform the Commission of whether a referral is opened for investigation, provide status reports and copy the Commission on correspondence to complainants related to complaint closure.

The Commission will not consider a complaint that is referred to another department as closed until it receives written notification from the department that the complaint has been resolved. The average open/closed charge age is based on the number of days that complaints have remained open and the number of days from receipt of complaint to the date of written notification of closure by the investigating department. Complaints that are not covered under Title VI are forwarded to the relevant department for review and action where appropriate.

There were 63 complaints received and referred by the Commission to 9 state departments and agencies.

Complaints Received and Referred by the Commission July 1, 2011 – June 30, 2012			
Departments	Complaints Filed	Total Cases Closed	Total Inventory of Cases
Administrative Office of the Courts	1	1	0
Arts	1	1	0
Children's Services	3	2	1
Correction	50	6	44
District Attorney General Conference	2	2	0
Education	2	1	1
Labor & Workforce Development	1	1	0
Tennessee Student Assistance Corporation	2	2	0
Transportation	1	0	1
Total	63	16	47

B. Complaints Received by Other Departments: July 1, 2011-June 30, 2012

The total number of complaints received by departments statewide is determined by the data reported in each department's implementation plan. According to the data provided in the implementation plans, individuals filed complaints with 5 out of 42 or 12% of the departments receiving federal funds. During the reporting period of July 1, 2011 - June 30, 2012, these five departments accounted for a total of 31 complaints that were received statewide; 30 complaints were closed; 1 complaint remained open.

Complaints received directly by state departments and reported in their implementation plans: July 1, 2011 - June 30, 2012			
Departments	Total Number of Title VI Complaints Filed	Complaints Closed	Total Inventory of Cases
Education	14	13	1
Human Services	9	9	0
DIDD	3	3	0
Health	2	2	0
THDA	3	3	0
Total Complaints Received Statewide	31	30	1

IV. IMPLEMENTATION PLANS

The Commission is responsible for the development of an implementation plan to be utilized by state governmental entities subject to the requirements of Title VI. A department's implementation plan must consist of the following sections: an overview; a description of the federal programs or activities; the organization of the Civil Rights Office and duties of the Civil Rights Coordinator; data collection and analysis, including total number of complaints received; definitions; discriminatory practices; Limited English Proficiency (LEP); complaint procedures; compliance review of subrecipients; compliance/noncompliance reporting; Title VI training plan; public notice and outreach; evaluation procedures of Title VI implementation; and responsible officials.

A total of 42 implementation plans were referred by the Commission. Based on the review, four of 42 plans were untimely or received after the October 1 due date. The following 32 out of 42 departments listed below, or 49%, were found to be in compliance with the guidelines and requirements. Of these 20 plans, two were untimely, but had no other significant issues nor raised other concerns with respect to compliance.

In Compliance

Administrative Office of the Courts
 Alcoholic Beverage Commission
 Arts Commission
 Board of Probation and *Parole (untimely receipt)*
 Bureau of Investigation

Bureau of TennCare
 Commission on Aging and Disability
 Commission on Youth and Children
 Community Services Agency
 Department of Children's Services
 Department of Commerce and Insurance

Department of Education
Department of Environment and Conservation
Department of Finance and Administration
Department of General Services
Department of Health Department of Human Services
Department of Intellectual and Developmental Disabilities
Department of Labor and Workforce Development
Department of Mental Health
Department of Revenue

Department of Safety and Homeland Security
District Public Defenders Conference
Department of Veterans Affairs
Higher Education Commission
Housing Development Agency
Human Rights Commission
Regulatory Authority
State Museum
State Veterans Homes Board
Student Assistance Corporation
Department of Treasury (*untimely receipt*)
University of Tennessee

Findings were issued to 10 of 42 departments, or 24%. There were four departments that received two findings; and six departments that received one finding. Please refer to the Appendix for a summary of the 2011-2012 Implementation Plan Review Findings.

The following is an overview of the findings for each department that was cited as non-compliant. Each department is followed by the date that the Commission received the plan, whether the submission was timely or untimely filed, the Commission's finding(s), and the departmental response and Commission's comments, where applicable, to the relevant guideline item.

Non-compliance with 2 Findings

BOARD OF REGENTS

Implementation Plan Submitted: 10/3/2011 – Timely

Findings:

- 1. No comprehensive LEP policy and/or procedure during Fiscal Year July 1, 2010 to June 30, 2011**
- 2. Complaint procedures out of compliance with statewide policy**

Departmental Response - "The Tennessee Board of Regents is currently in the process of revising TBR Policy 2:08:30:00 to address LEP assistance for third parties at the Central Office. This policy will include a step by step process for potential and current students, faculty and staff. Because of the internal process for creating and changing policies, we anticipate this policy to be in place by October 1, 2012."

Commission Comments: The Tennessee Human Rights Commission established Title VI State Policy Guidance 11-03, effective August 26, 2011, which states that all departments must have internal complaint procedures stating that Title VI complaints be filed within 180 days of the alleged discriminatory conduct. Title VI complaints filed after 180 days should be deemed untimely and not be accepted unless certain exceptions apply. This policy was instituted to establish uniformity

and consistency in the area of Title VI compliance throughout state government in Tennessee.

DEPARTMENT OF CORRECTION

Implementation Plan Submitted: 1/2/2012 – Untimely

Findings:

- 1. Data collection and analysis (complaint monitoring)**
- 2. Compliance review - failed to monitor subrecipients during FY July 1, 2010 to June 30, 2011**

Departmental Response - None

Commission Comments: During FY July 1, 2010 to June 30, 2011, the Tennessee Human Rights Commission (Commission) referred 46 Title VI complaints to TDOC for review and investigation; however, TDOC failed to submit status reports of the 46 complaints to the Commission for review. The Commission conducted a detailed review of the files as a part of the on-site review process in February 2012; therefore, additional findings from the on-site review will be forthcoming.

DEPARTMENT OF STATE

Implementation Plan Submitted: 9/30/2011 – Timely

Findings:

- 1. Did not train departmental staff on Title VI July 1, 2010 to June 30, 2011**

Departmental Response - "Title VI training has been given to division directors in previous years."

- 2. Limited English Proficiency - No documentation provided to verify that the department has in place an LEP policy for staff to follow.**

Departmental Response - None

Commission Comments: The department did not respond to specific guidance that was provided in the initial review comments forwarded to the agency, Title VI Coordinator on January 20, 2012.

MILITARY DEPARTMENT OF TENNESSEE

Implementation Plan Submitted: 9/20/2011 – Timely

Findings:

- 1. Data collection and analysis - implementation plan does not provide racial and ethnic data and subsequent analyses that could be used to determine how effectively programs are reaching eligible groups.**

Departmental Response - "Our Process Action Team will explore methods of how to include a meaningful representation of Sub-Recipient data collection and analysis in our FY 13 plan."

2. The department did not train its staff on Title VI July 1, 2010 to June 30, 2011.

Departmental Response - "For the period July 1, 2010 to June 30, 2011 the Title VI Coordinator for the Military Department received training via the TDOT on-line training program."

Non-compliance with 1 Finding

ARTS COMMISSION

Implementation Plan Submitted: 9/29/2011 – Timely

Findings:

1. Did not train departmental staff on Title VI July 1, 2010 to June 30, 2011.

Departmental Response - "In 2010-2011, there was no Title VI training conducted at the agency. Our Title VI coordinator retired in DEC 2010. The replacement only worked for 4 months in 2011. The agency was without a coordinator until November of 2011."

DEPARTMENT OF AGRICULTURE

Implementation Plan Submitted: 10/10/2011 – Untimely

Findings:

1. Did not train departmental staff on Title VI July 1, 2010 to June 30, 2011

Departmental Response - "Proposed dates for future training programs are TBD, but expected to begin November 2011."

DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

Implementation Plan Submitted: 9/30/2011

Findings:

1. Did not train departmental staff on Title VI July 1, 2010 to June 30, 2011

Departmental Response - "Title VI training was inadvertently not completed during FY11 due to refocus of resources to the aftermath of the May 2010 flood, which included numerous grants for disaster recovery; the change in administration a top-to-bottom review; the implementation of new policies and procedures; and a 40% reduction in staff. In addition, the Comptroller initiated a thorough review of our department but such work is not yet complete, and, as such, did not uncover this discrepancy. Regardless, ECD understands that Title

VI training is important and we have worked to implement this as a core procedure. We have recognized the responsibility for this training and will expand Title VI training going forward. Specifically, ECD has developed Title VI web-based training that will be available to all staff by the end of November 2011. Web training programs will be housed on ECD's website and a report will be available to show employees and all management personnel who completed the training. Additionally, ECD is conducting a general training session December 6-9, 2011, which will include Title VI training. The total number of staff varied significantly during FY11. Number of staff ranged from a little over 200 employees to approximately 125 today."

DEPARTMENT OF TRANSPORTATION

Implementation Plan Submitted: 10/3/2011 - Timely

Findings:

- 1. Data collection and analysis - failure to provide collection of statistical data of participants in, and beneficiaries of State highway programs, i.e., relocates, impacted citizens and affected communities as required by federal regulations, 23 CFR 200.9(b)(4) and 49 CFR 21.9(b) and (c).**

Departmental Response .

- 1. TDOT Civil Rights Division's (CRD) Title VI Program staff implemented a data collection program that includes the development of a toolbox. The data collection program will be implemented as a three-year phase/process due to the breadth of the services/programs TDOT provides. Data collected will include, for example, an analysis of Right-of-Way's Acquisitions/Relocations and Construction's utilization of Disadvantage Business Enterprises.*
- 2. Title VI Program staff modified the Annual Title VI Assessments for 2012 to include a section to capture data relevant to the program areas of which data will be collected; and,*
- 3. Title VI Program staff will distribute the assessments mid-May 2012 to the various divisions.*

DISTRICT ATTORNEYS GENERAL CONFERENCE

Implementation Plan Submitted: 9/29/2011 – Timely

Findings:

- 1. Failure to provide documentation of a waiver from any federal funding source(s) which excuses the requirement of maintaining racial and ethnic data related to its programs and activities.**

Departmental Response - None

Commission Comments: The Commission received correspondence indicating that DAGC conducted a review of its contracts, but DAGC did not provide documentation from the federal funding source(s) concerning a waiver as required by the implementation plan guidelines.

WILDLIFE RESOURCES AGENCY

Implementation Plan Submitted: 9/27/2011 – Timely

Findings:

1. No compliance review process for monitoring subrecipients, to include grantees

Departmental Response - None

Commission Comments: TWRA should monitor any and all subrecipients, especially if the subrecipient provides a benefit to the public. A grantee is a subrecipient. Based on the information provided in the update to TWRA's implementation plan received by the Commission on January 13, 2012, TWRA does in fact have subrecipients, to include grantees. At minimum, Carroll County is a subrecipient of funds from TWRA for the construction of a Shooting Sports Park (Hunter Education Program). As a result, Carroll County should be monitored by TWRA for Title VI compliance. An on-site compliance review of TWRA was conducted in April 2012, final findings are forthcoming.

APPENDIX

APPENDIX - SUMMARY OF 2011 IMPLEMENTATION PLAN REVIEW FINDINGS

TENNESSEE DEPARTMENTS AND AGENCIES	RECEIPT DATE	UNTIMELY RECEIPT	FINDINGS
DEPARTMENTS WITH 3 FINDINGS			
none			
DEPARTMENTS WITH 2 FINDINGS			
Board of Regents	10/3/2011		<ul style="list-style-type: none"> • no comprehensive LEP policy • complaint procedures out of compliance w/ statewide policy
Department of Correction	1/12/2012	✓	<ul style="list-style-type: none"> • data collection and analysis • compliance review
Department of State	9/30/2011		<ul style="list-style-type: none"> • did not train departmental staff on Title VI • no LEP policy and/or procedure for employees
Military Department	9/20/2011		<ul style="list-style-type: none"> • data collection and analysis • did not train departmental staff on Title VI
DEPARTMENTS WITH 1 FINDING			
Arts Commission	9/29/2011		<ul style="list-style-type: none"> • did not train departmental staff on Title VI
Department of Agriculture	10/10/2011	✓	<ul style="list-style-type: none"> • did not train departmental staff on Title VI
Department of Economic and Community Development	9/30/2011		<ul style="list-style-type: none"> • did not train departmental staff on Title VI
Department of Transportation	10/3/2011		<ul style="list-style-type: none"> • data collection and analysis
District Attorneys General Conference	9/29/2011		<ul style="list-style-type: none"> • data collection and analysis
Wildlife Resources Agency	9/27/2011		<ul style="list-style-type: none"> • no compliance review process for monitoring subrecipients, to include grantees
DEPARTMENTS WITH NO FINDINGS			
Administrative Office of the Courts	9/30/2011		<ul style="list-style-type: none"> • no findings
Alcoholic Beverage Commission	10/3/2011		<ul style="list-style-type: none"> • no findings
Board of Probation and Parole	10/10/2011	✓	<ul style="list-style-type: none"> • no findings
Bureau of Investigation	9/30/2011		<ul style="list-style-type: none"> • no findings
Bureau of TennCare	9/6/2011		<ul style="list-style-type: none"> • no findings
Commission on Aging and Disability	9/30/2011		<ul style="list-style-type: none"> • no findings
Commission on Children and Youth	9/29/2011		<ul style="list-style-type: none"> • no findings
Community Services Agency	9/30/2011		<ul style="list-style-type: none"> • no findings

APPENDIX - SUMMARY OF 2011 IMPLEMENTATION PLAN REVIEW FINDINGS

TENNESSEE DEPARTMENTS AND AGENCIES	RECEIPT DATE	UNTIMELY RECEIPT	FINDINGS
DEPARTMENTS WITH NO FINDINGS			
Department of Children's Services	10/3/2011		• no findings
Department of Commerce and Insurance	10/3/2011		• no findings
Department of Education	9/30/2011		• no findings
Department of Environment and Conservation	9/30/2011		• no findings
Department of Finance and Administration	10/3/2011		• no findings
Department of General Services	9/30/2011		• no findings
Department of Health	9/29/2011		• no findings
Department of Human Services	9/30/2011		• no findings
Department of Intellectual and Developmental Disabilities	9/30/2011		• no findings
Department of Labor and Workforce Development	9/27/2011		• no findings
Department of Mental Health	9/30/2011		• no findings
Department of Revenue	9/30/2011		• no findings
Department of Safety and Homeland Security	9/30/2011		• no findings
Department of Veterans Affairs	9/30/2011		• no findings
District Public Defenders Conference	9/30/2011		• no findings
Higher Education Commission	10/3/2011		• no findings
Housing Development Agency	9/29/2011		• no findings
Human Rights Commission	9/29/2011		• no findings
Regulatory Authority	9/30/2011		• no findings
State Museum	10/3/2011		• no findings
State Veterans' Homes Board	9/30/2011		• no findings
Student Assistance Corporation	10/3/2011		• no findings
Treasury Department	10/5/2011	✓	• no findings
University of Tennessee	9/30/2011		• no findings