



TITLE VI SUBRECIPIENT TRAINING

Ensuring equal access to TEMA-supported programs,
services, grants, and disaster assistance.

TEMA Title VI Compliance Officer
Carma Sharp

Last Revised
September 2026

The Department of the Tennessee Emergency Management Authority



HOW TO COMPLETE THIS TRAINING

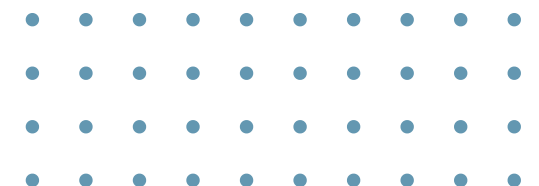


Please review each slide in this presentation. At the end, complete the Title VI Training Certification and Compliance Survey to confirm that you have reviewed the required information.

This presentation covers:

- **Title VI requirements**
- **When Title VI applies**
- **Subrecipient responsibilities**
- **Equal access and nondiscrimination**
- **Limited English Proficiency**
- **Complaint procedures**
- **Compliance documentation**

The certification and compliance survey information is provided at the end of this training.





WHAT YOU WILL LEARN

After reveiwing this presentation, you should be able to:



**Explain the purpose of Title VI
of the Civil Rights Act of 1964.**



**Identify when Title VI applies
to an entity or program.**



**Describe the responsibilities of
TEMA subrecipients.**



**Recognize potential
discrimination and
compliance concerns.**



**Explain how to provide
meaningful access to individuals
with Limited English Proficiency.**



**Indentify how to report or respond
to a Title VI complaint.**





WHAT IS TITLE VI: *THE FEDERAL REQUIREMENT*

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance.

No person in the United States may be:

- Excluded from participation in;
- Denied the benefits of; or
- Subjected to discrimination under

any program or activity receiving federal financial assistance.

Federal Law (42 U.S.C. 2000d):

*Title VI of the Civil Rights Act of 1964 ensures that no person in the United States shall, on the grounds of **race, color or national origin**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination **under any program or activity receiving Federal financial assistance.***



TENNESSEE LAW

Tennessee law also prohibits a state agency receiving federal funds—or a person, including government, government agencies, public authorities, and other entities receiving federal funds from a state agency—from discriminating based on:

- Race
- Color
- National origin

This protection applies to programs and activities supported with federal financial assistance.

State Law (T.C.A. § 4-3-1706):

*It is a discriminatory practice for any state agency **receiving federal funds** making it subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.), or for **a person receiving such federal funds from a state agency**, to exclude a person from participation in, deny benefits to a person, or to subject a person to discrimination under **a program or activity receiving such funds, on the basis of race, color, or national origin.***

WHAT IS FEDERAL FINANCIAL ASSISTANCE?

Federal financial assistance may include:

- Grants and awards of money
- Federal training
- Loans of federal personnel or equipment
- Cooperative agreements
- Other federal agreements or arrangements intended to provide assistance

Federal financial assistance is generally provided to support a program, activity, or service.

Not every federal transaction is considered financial assistance.

Examples that generally are not federal financial assistance include:

- Procurement contracts
- Federal insurance or guarantees
- Licenses and permits
- Regulated programs
- Direct benefits such as Social Security payments



WHEN DOES TITLE VI APPLY?

Title VI applies when an individual or entity receives federal financial assistance, either directly or indirectly.

Direct Recipient

An entity that receives federal financial assistance directly from a federal agency.

Indirect Recipient

An entity or individual that benefits from federal financial assistance through another organization or program.

Key Point: *If federal financial assistance supports a program or activity, Title VI requirements likely apply to the entities carrying out that program.*





PRIMARY RECIPIENTS AND SUBRECIPIENTS



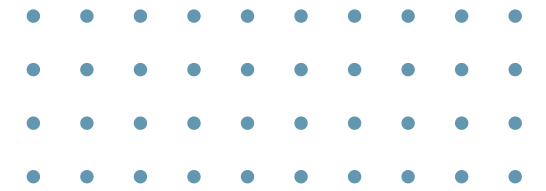
Primary Recipient

receives federal financial assistance directly from a federal agency and may distribute or pass that assistance to another entity.

Subrecipient

receives federal financial assistance through a primary recipient to carry out all or part of a federally supported program.

Key Point: Both primary recipients and subrecipients have responsibilities under Title VI.



FEDERAL ASSISTANCE MAY FLOW LIKE THIS:

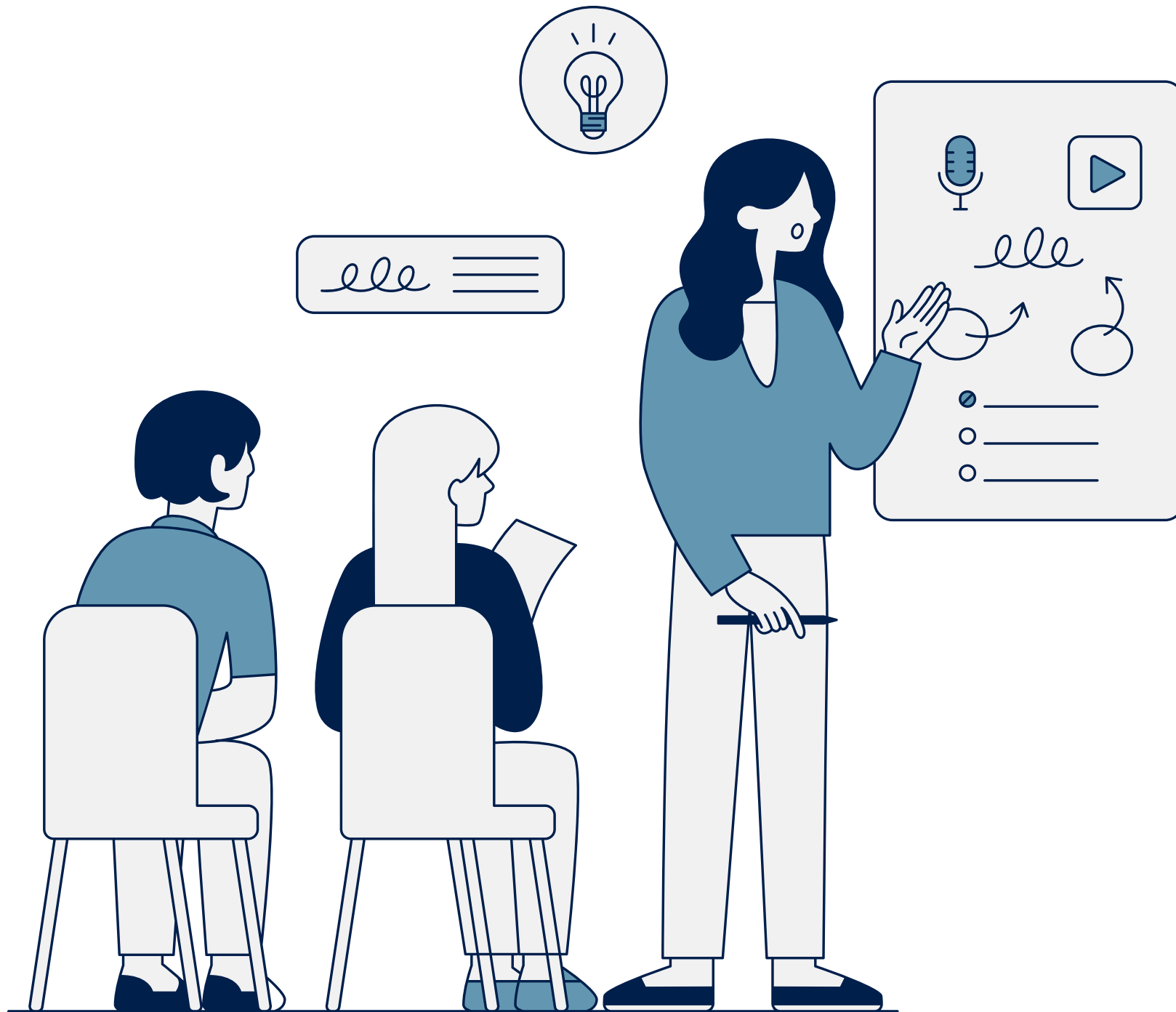
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graph LR; A[Federal Agency] --> B[TEMA]; B --> C[Local government or organization]; C --> D[Community members];
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Federal Agency

TEMA

**Local government or
organization**

Community members



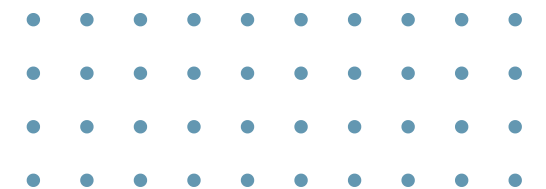
HOW TITLE VI APPLIES TO TEMA

TEMA administers and supports federally funded programs, grants, and disaster assistance.

Title VI requirements may apply to:

- **TEMA programs and services**
- **Grants and pass-through funding**
- **Public assistance and disaster recovery activities**
- **Preparedness and mitigation programs**
- **Training and technical assistance**
- **Emergency response and recovery services**
- **Contractors and subrecipients carrying out TEMA-supported work.**

TEMA delivers services and manages federal assistance in a nondiscriminatory manner in compliance with Title VI.





SHARED RESPONSIBILITY FOR COMPLIANCE

TEMA and its subrecipients share responsibility for:

- Preventing discrimination
- Providing equal access to programs and services
- Monitoring compliance
- Maintaining required policies and records
- Training relevant staff and volunteers
- Receiving and responding to complaints
- Addressing potential noncompliance
- Providing language assistance when needed
- Ensuring public information is accessible and understandable

Compliance is the responsibility of everyone involved in administering a TEMA-supported program.

SUBRECIPIENT TITLE VI REQUIREMENTS

TEMA subrecipients must maintain:

- A designated Title VI coordinator or point of contact
- A written nondiscrimination policy
- A Limited English Proficiency policy or procedure
- Title VI training materials and records
- A current Title VI notice or poster
- Compliant intake and review procedures
- A complaint log
- Documentation showing how equal access is provided
- Records of training and compliance activities
- A process for reporting concerns to TEMA

***Key Point:
Additional
requirements may
apply based on
the specific
federal program,
grant agreement,
or applicable
regulations.***



TITLE VI APPLIES THROUGHOUT THE ENTITY

Title VI responsibilities are not limited to the specific employee, office, or activity receiving federal funds.

Entities must consider equal access throughout program delivery, including:

- Outreach and public information
- Application and eligibility processes
- Service delivery
- Emergency assistance
- Public meetings and hearings
- Contracting and procurement related to the program
- Complaint handling
- Program monitoring and evaluation

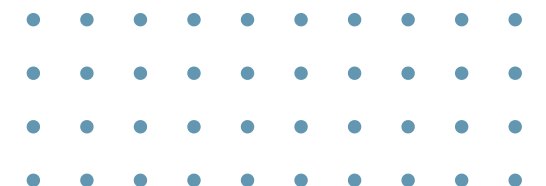
Every individual or entity involved in a TEMA-supported program has a role in compliance.

RECOGNIZING POTENTIAL VIOLATIONS



Potential Title VI violations may include:

- Denying access to a program or benefit based on race, color or national origin
- Providing different services or assistance to similarly situated individuals
- Using eligibility requirements that unnecessarily exclude a protected group
- Failing to provide important information in an accessible language
- Conducting outreach in a way that excludes part of the community
- Treating someone differently because of their national origin or language
- Retaliating against someone who raises a civil rights concern
- Failing to respond appropriately to a complaint





EXAMPLES OF UNEQUAL ACCESS

Example 1: Program Access

An organization allows some residents to apply for disaster assistance but prevents other residents from applying because of race, color, or national origin.

Example 2: Language Access

An organization provides important information only in English even though residents with Limited English Proficiency need language assistance to understand their rights or access services.

Example 3: Public Participation

A public meeting is held in a location or at a time that creates an unnecessary barrier for a significant portion of the affected community, and no alternative method for participation is provided.

RELATED CIVIL RIGHTS REQUIREMENTS

Federally supported programs may also be subject to other nondiscrimination requirements, including protections related to:

- Disability
- Age
- Sex or gender
- Limited English Proficiency
- Accessibility and effective communication

Title VI training is part of a broader responsibility to provide civil protections and equal access.

Key Point: If you are unsure which requirements apply to your program, contact TEMA's Title VI Compliance Officer.



WHAT DOES LEP MEAN?

A person may have Limited English Proficiency, or LEP, if they do not speak English as their primary language and have a limited ability to:

- Read English
- Speak English
- Write English
- Understand English

Treating someone differently because of their Limited English Proficiency may constitute national origin discrimination.

Individuals with LEP are likely entitled to language assistance to access important programs, services, benefits, and information.

PROVIDING LANGUAGE ASSISTANCE

When language assistance is needed:

- Contact your organization's Title VI coordinator or designated point of contact.
- Use qualified interpretation or translation services.
- Provide language assistance at no cost to the individual.
- Do not rely on children or untrained individuals to interpret important information.
- Identify materials that may need to be translated.
- Document language assistance provided.
- Make sure staff know how to request language services.

Key Point:
Language assistance should be provided in a timely manner so the individual can meaningfully access the program or service.



MEANINGFUL PUBLIC PARTICIPATION

Equal access includes how information is shared and how people are invited to participate.

Subrecipients should to the maximum extent practicable:

- **Hold meetings in accessible and convenient locations**
- **Provide reasonable accommodations**
- **Share information through multiple communication channels**
- **Use local media and trusted community partners**
- **Provide translated or accessible materials when needed**
- **Post information on the organization's website**
- **Allow adequate time for public input**
- **Consider the needs of historically underserved communities**

RECEIVING AND RESPONDING TO COMPLAINTS

Individuals who believe they have experienced discrimination may file a Title VI complaint with the appropriate recipient, subrecipient or TEMA office.

Subrecipients must:

- Accept complaints without retaliation.
- Document the complaint.
- Notify the appropriate TEMA contact.
- Forward complaints when TEMA has jurisdiction.
- Preserve relevant records.
- Cooperate with the review or investigation.
- Communicate next steps to the complainant.

TEMA Complaint Contact

Carma Sharp

TEMA Title VI Compliance Officer

Carma.Sharp@tn.gov

Key Point: Complaints must be handled promptly and according to the organization's written procedures.

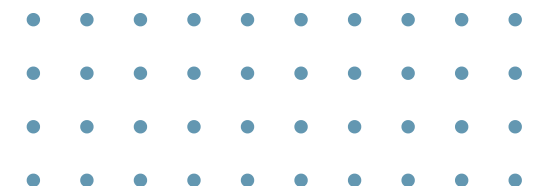


TITLE VI COMPLIANCE MONITORING

TEMA may monitor compliance through:

- Compliance surveys
- Review of policies and procedures
- Training records
- Complaint logs
- Program files
- Outreach and public participation records
- Language assistance documentation
- Site visits or desk reviews
- Corrective action follow-up

Compliance documentation should show what an individual or entity does, not just what its policies say.



CONSEQUENCES OF NONCOMPLIANCE

Failure to comply with Title VI requirements may result in:

- Corrective action requirements
- Additional monitoring
- Suspension of payments
- Withholding of funds
- Suspension or termination of an award
- Cancellation of a grant or contract
- Referral to the appropriate federal or state authority

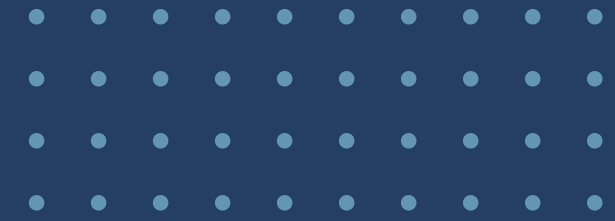
Key Point:
Maintaining
compliance helps
protect access to
services, protects
the individuals
and entities and
supports
continued
funding.

SUBRECIPIENT COMPLIANCE CHECKLIST

Before completing the survey, confirm that you have:

- A Title VI coordinator or point of contact
- A written nondiscrimination policy
- A Limited English Proficiency policy or procedure
- Title VI training documentation
- A posted or distributed Title VI notice
- Complaint procedures
- A complaint log
- Language assistance procedures
- Records showing outreach and equal access
- A process for reporting concerns to TEMA

TRAINING CONFIRMATION AND COMPLIANCE SURVEY



**Confirm the completion of Title VI
training by completing the
Compliance Survey**

*If the button above does not work, enter the following URL into your browser:
<https://arcg.is/14abGW2>*