

Submission of Title VI Implementation Plans

June 30, 2001



STATE OF TENNESSEE
COMPTROLLER OF THE TREASURY

State Capitol
Nashville, Tennessee 37243-0260
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John G. Morgan
Comptroller

April 30, 2002

The Honorable John S. Wilder
Speaker of the Senate
The Honorable Jimmy Naifeh
Speaker of the House of Representatives
and
Members of the General Assembly
State Capitol
Nashville, Tennessee 37243

Ladies and Gentlemen:

Transmitted herewith is the report on the submission of Title VI implementation plans. This review was conducted pursuant to the requirements of Section 4-21-901, *Tennessee Code Annotated*.

Sincerely,

A handwritten signature in black ink that reads "John G. Morgan".

John G. Morgan
Comptroller of the Treasury

JGM/lab

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TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION	1
Authority	1
Objectives of the Review	1
Scope and Methodology of the Review	1
Purpose and Scope of Title VI	2
Title VI Plan Guidelines	3
OBSERVATIONS AND COMMENTS	3
Filing Title VI Complaints of Discriminatory Practices	4
CONCLUSIONS	7
Title VI Implementation Plans	7
Title VI Complaints	7
Summary	7
APPENDICES	8
Appendix A–Status of Title VI Implementation Plans	8
Appendix B–Title VI Complaints Reported	13

Submission of Title VI Implementation Plans June 30, 2001

INTRODUCTION

AUTHORITY

Chapter 502 of the Public Acts of 1993 (Section 4-21-901, *Tennessee Code Annotated*) requires those state agencies subject to the requirements of Title VI of the Civil Rights Act of 1964 to develop a Title VI implementation plan. These plans were to be submitted to the Department of Audit by June 30, 1994, and are to be submitted each June 30 thereafter.

Section 4-21-901 further requires the Department of Audit to publish, at least once a year, a cumulative report of its findings and recommendations concerning compliance with the statute's requirements. Pursuant to that directive, this report will identify the plans submitted to the Department of Audit.

OBJECTIVES OF THE REVIEW

The objectives of the review were to summarize the purpose and scope of Title VI and to detail agencies' compliance with the reporting requirements in *Tennessee Code Annotated*, Section 4-21-901.

SCOPE AND METHODOLOGY OF THE REVIEW

The Title VI plans submitted to the Department of Audit are the result of a self-reporting process in which each agency drafts its own plan. The Division of State Audit's review of the agencies' plans was limited to whether the plans had been submitted.

In addition, telephone interviews were conducted with each agency Title VI Coordinator primarily for the determination of Title VI complaints filed against each respective agency from July 1, 2000, to June 30, 2001. Title VI complaints were verified with the Tennessee Human Rights Commission.

Accordingly, we do not attempt to express an opinion on the implementation of the provisions in the plans. Rather, this review will be limited to determining if Title VI implementation plan documents were submitted.

PURPOSE AND SCOPE OF TITLE VI

Title VI of the Civil Rights Act of 1964, as codified in 42 U. S. C. 2000d, states:

No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.

Title VI is intended to prohibit discrimination on the basis of race, color, or national origin in federally assisted programs even if federal money makes up only a portion of the program's budget. The emphasis of Title VI is on services provided by a government agency to the citizens of a given area. If federal money is used to provide services, Title VI applies, and services must be delivered in a nondiscriminatory manner.

A recipient of federal assistance violates Title VI when it

- denies an individual service, aid, or benefits because of race, color, or national origin;
- provides only inferior or discriminatory service, aid, or benefits because of any individual's race, color, or national origin;
- subjects an individual to segregation or different treatment in relation to aid, services, or benefits because of race, color, or national origin;
- restricts or discourages individuals in their enjoyment of facilities because of race, color, or national origin;
- treats an individual differently because of race, color, or national origin in regard to eligibility for programs or services;
- uses criteria which would impair accomplishment of the Act's objectives or which would subject individuals to discrimination because of race, color, or national origin;
- discriminates against an individual in any program or activity that is conducted in a facility constructed even partly with federal funds; or
- subjects an individual to discriminatory employment practices under any federal program intended to provide employment.

TITLE VI PLAN GUIDELINES

The Human Rights Commission has issued guidelines for the development of Title VI implementation plans. By following these guidelines, agencies can ensure that their plan documents are comprehensive and complete.

OBSERVATIONS AND COMMENTS

In general, most agencies have taken the steps necessary to prepare vigorous Title VI implementation plans. See Conclusions for the status of submission of implementation plans for fiscal years 1995 through 2001.

As reported in *Tennessee State Agencies and Title VI of the Civil Rights Act of 1964*, issued in 1994 by the Comptroller's Office of Local Government, many state agencies receiving federal funding were generally unaware of or had little knowledge of their responsibilities under Title VI. This situation arose, in part, because the federal entity responsible for coordinating implementation of Title VI—the U.S. Department of Justice—placed little emphasis on and provided no guidance on Title VI compliance.

Because most state agencies knew little about Title VI compliance issues, many referred to existing plans and examples for guidance when drafting their 1994-95 plans. The examples, however, lacked several elements necessary for compliance with U.S. Department of Justice guidelines. Governor Ned McWherter assigned the responsibility of monitoring Title VI compliance to the State Planning Office on March 1, 1994. As the State Planning Office received the implementation plans, staff reviewed the plans and compared them to the guidelines. State Planning then sent comments on weaknesses noted and requested revised plans. As a result, several agencies submitted revised plans that satisfied the necessary Title VI requirements. On June 12, 1995, the State Planning Office was repealed by Chapter 501, Public Acts of 1995. The Human Rights Commission has taken on the role of monitoring the plans. On October 15, 1998, the Commissioner of Finance and Administration notified all cabinet officers and agency heads that the Human Rights Commission is the coordinating state agency for the monitoring and enforcement of Title VI. On June 12, 2000, the State Attorney General issued Opinion No. 00-107, regarding the statutory authority of the Human Rights Commission regarding Title VI, and opined that the commission did not have authority to monitor or enforce Title VI. Instead, the commission has statutory authority to enforce Tennessee's version of Title VI found in Section 4-21-904-905, *Tennessee Code Annotated*.

FILING TITLE VI COMPLAINTS OF DISCRIMINATORY PRACTICES

Tennessee Code Annotated, Section 4-21-905, specifies the procedures for filing a complaint concerning discriminatory practices. Any person claiming to be aggrieved by a discriminatory practice under this part has 180 days to file a complaint with the state agency receiving federal funds. An aggrieved person may also file a complaint with the Human Rights Commission, as provided in *Tennessee Code Annotated*, Section 4-21-302. Complaints filed with state agencies are subject to review by the Human Rights Commission for applicability under Title VI of the Civil Rights Act of 1964.

During fiscal year 2000-2001, six state agencies received Title VI complaints. Except for the complaints filed by inmates against the Department of Correction, we reviewed the current status of these complaints.

The **Department of Human Services (DHS)** received two Title VI complaints which involved race and were filed by Hispanic women. One complainant alleged that she was denied service and/or the opportunity to file an application for food stamps because of her nationality. The department was not in violation of Title VI because the individual's case files did contain a processed application for food stamps/TennCare. The client was ineligible for food stamps because she exceeded the income limit. However, her TennCare/Medicaid benefits were delayed due to a caseworker's error but were later approved prior to receipt of her complaint.

The second complainant was not provided an interpreter during a food stamp interview. During the investigation, it was determined that the client's rights were violated because she was not provided an interpreter at the time of service and that the staff person made ethnically and culturally insensitive remarks toward the client. The staff person was reprimanded, and the client was provided with an interpreter and approved for benefits.

DHS's Title VI Implementation Plan mistakenly reported three Title VI complaints instead of two.

The **Board of Probation and Parole** received one Title VI complaint. An employee of this agency filed a complaint alleging discrimination on the basis of race, color, and national origin. This individual felt she was treated in a discriminatory manner and that she was treated differently from another person of a different race, color, and national origin regarding employment in a Sentence Docket Technician II position. After full investigation, remedies were taken, and the complainant was promoted to a Technician II. She received back pay at the entry level of this position.

The **Tennessee Board of Regents** received two Title VI complaints, which primarily involved race. An African-American male alleged that his Tennessee State University (TSU) professors had slandered him and that a professor of African origin discriminated against African-American students in his grading. TSU's Office of Equal Opportunity and Affirmative

Action (EO/AA) was in the process of initiating its investigation, but the complainant requested in writing that the matter be closed.

An African-American female alleged that a TSU Art Department staff member improperly denied her work-aid. She also alleged that the staff member improperly disclosed to her boyfriend, the staff member's nephew, information related to her marital and economic status. TSU's EO/AA office found insufficient evidence to support a finding of discrimination but recommended that the staff member receive a written reprimand for improperly disclosing information. The staff member was reprimanded in May 2001.

The **Department of Finance and Administration's TennCare Bureau** received four Title VI complaints. Three of the four complaints were filed by Hispanic women, all of whom alleged that translator services were not available to limited-English enrollees. In each of the three cases, the Managed Care Organization (MCO) provided a translator so that the enrollee could receive services.

A Caucasian female who alleged that due to her race she was treated rudely by a provider's employee filed the fourth complaint. In this case, the MCO's Title VI Compliance Officer provided cultural sensitivity and Title VI training for the MCO's staff, and the enrollee dropped the complaint.

The **Department of Transportation (DOT)** received two Title VI complaints. The first Title VI complaint involved race. An African-American male alleged that the expected improvements to his sidewalk had not been made. The complaint was substantiated after a DOT investigation, and the City of Chattanooga improved the complainant's sidewalk, thus satisfying the complaint. There was no suspension of the city's funding since improvements to the sidewalk were made within a 30-day period.

The second complaint involved gender discrimination and was directed toward one of DOT's contractors. The dispute was regarding the lack of subcontracting opportunities being directed toward the female complainant. Mediation was suggested; however, the complainant decided mediation would not be necessary since the prime contractor started directing subcontracting opportunities to her.

The **University of Tennessee (UT)** received nine Title VI complaints, most of which involved race. The first complaint involved an African-American female who worked in the Office of Purchasing. The complainant alleged disparate treatment in her working terms and conditions due to her race. The complainant did not file an official complaint; however, the Office of Equity and Diversity (OED) made some general inquiries. The complainant was reassigned from her duties and located to a new project at UT. The complainant was satisfied with the reassignment because it represented a promotion in responsibilities and opportunities.

An African-American female alleged unequal pay due to her race in comparison to a Caucasian female who performed similar job responsibilities. The Office of Human Resources reviewed the positions and agreed that there was a discrepancy in pay. The complainant's level of pay was corrected, and the matter was resolved.

An African-American female faculty member alleged that she was not promoted due to her race. No official complaint was filed with the OED. However, OED did monitor the search process to fill the vacant position and took measures to correct any problems that surfaced. The complainant was interviewed but was not offered the position. She has filed a complaint of discrimination with the Equal Employment Opportunity Commission (EEOC). This complaint is still pending.

An African-American female alleged that she was not admitted into a graduate program due to her race. A preliminary investigation indicated that the complainant failed to meet admission requirements and that all requirements are applied to all applicants. Statistics revealed a high number of African-American females within the program, all of whom met program admission requirements. The complainant applied for and was admitted into another graduate program and chose not to pursue her complaint any further.

An African-American female alleged unequal pay when compared to a Caucasian female in a similar position. OED's investigation indicated that there was a difference in pay because the Caucasian female had more seniority at UT and in the position than the African-American female. No discrimination was found.

A Caucasian male alleged that he was not hired for a position due to his race when he compared himself to an African-American female hired in the position for which he had applied. A preliminary investigation indicated that the initial offer made by the department was made to the female because she had more experience and better qualifications than the complaining party. The female declined the offer, and the offer was made to another African-American female, who met all the job requirements and had a higher level of education than the Caucasian male. The male has filed a complaint with the EEOC. This complaint is still pending.

An African-American female alleged unequal pay and disparate treatment in her working terms and conditions. The OED investigated the complaint and found no discrimination. The complainant has a pending complaint with the Tennessee Human Rights Commission and the EEOC.

A Hispanic male, employed in the physical plant, alleged disparate treatment due to his race, particularly as it related to gaining regular employment. An investigation found problems. The complainant was reassigned to a new supervisor and shift, and he gained regular employment status.

An African-American male alleged unfair treatment due to his race in disciplinary action for an alleged altercation he had with a coworker. An internal investigation was conducted by

Student Housing as well as by OED. Results of the investigation did not indicate that the proposed disciplinary action was discriminatory. The complainant had requested a job transfer to another unit within the department. Disciplinary action was taken along with a final warning, and the complainant was transferred to another unit.

CONCLUSIONS

TITLE VI IMPLEMENTATION PLANS

As of October 30, 2001, all state agencies that are required to submit a Title VI Implementation Plan for fiscal year 2002 had done so. Appendix A presents the status of Title VI implementation plans submitted for fiscal years 1995 through 2002.

TITLE VI COMPLAINTS

See Appendix B for the number of complaints filed with state agencies during fiscal years 1995 through 2001.

SUMMARY

The true measure of successful compliance will not hinge so much on whether plans have been prepared and submitted but rather on whether the provisions contained in the plans are actually carried out. Currently, the Human Rights Commission does not have the statutory authority to review, monitor, and enforce Title VI compliance.

In addition to the commission's investigation of complaints, the Division of State Audit's financial and compliance audit reports of agencies subject to the requirements of Title VI of the Civil Rights Act of 1964 will include material violations of Title VI requirements noted during the audit. Reports issued through March 31, 2002, contain no findings addressing violations of Title VI.

**Status of Title VI Implementation Plans
As of March 31, 2002**

Appendix A

<u>State Entity</u>	<u>FY 95 Plan Submitted</u>	<u>FY 96 Plan Submitted</u>	<u>FY 97 Plan Submitted</u>	<u>FY 98 Plan Submitted</u>	<u>FY 99 Plan Submitted</u>	<u>FY 00 Plan Submitted</u>	<u>FY 01 Plan Submitted</u>	<u>FY 02 Plan Submitted</u>
Commission on Aging and Disability	06/30/94 Revised 09/16/94	06/30/95	06/28/96	07/01/97	07/01/98	06/30/99	07/03/00	07/13/01
Department of Agriculture	06/30/94 Revised 11/7/94	06/30/95 letter stated prior plan remained in effect	06/27/96 letter stated plan being revised	07/10/97	07/21/98	06/30/99	07/03/00	07/01/01
Alcoholic Beverage Commission	10/25/94	06/29/95	07/11/96	07/03/97	07/29/98	07/08/99	06/30/00	06/29/01
Arts Commission	07/29/94 Revised 11/10/94	06/30/95	07/08/96	06/24/97	06/30/98	06/30/99	06/30/00	06/29/01
Commission on Children and Youth	06/30/94 Revised 09/30/94	06/30/95	06/28/96	06/30/97	06/30/98	06/29/99	07/18/00	06/27/01
Department of Children's Services ¹	08/01/94	06/28/95	06/28/96	06/30/97	07/08/98	06/30/99	06/29/00	06/29/01
Department of Commerce and Insurance	NA	NA	NA	NA	06/29/98	06/24/99	06/29/00	07/05/01 letter stating plan is the same as '98 plan
Department of Correction	08/17/94 Revised 11/18/94	06/30/95 Revised 08/21/95	06/28/96	06/27/97	06/30/98	06/30/99	06/29/00	06/29/01

¹ FY 95 and FY 96 plans were submitted by the Department of Youth Development.

**Status of Title VI Implementation Plans
As of March 31, 2002 (Cont.)**

<u>State Entity</u>	<u>FY 95 Plan Submitted</u>	<u>FY 96 Plan Submitted</u>	<u>FY 97 Plan Submitted</u>	<u>FY 98 Plan Submitted</u>	<u>FY 99 Plan Submitted</u>	<u>FY 00 Plan Submitted</u>	<u>FY 01 Plan Submitted</u>	<u>FY 02 Plan Submitted</u>
Administrative Office of the Courts	Entity indicated report pending per letter dated 12/15/94	08/23/95	04/04/97	07/09/97	06/30/98	06/29/99	06/30/00	07/02/01
District Attorneys General Conference	Entity indicated report pending per letter dated 12/21/94	07/06/95	06/28/96	07/25/97	06/30/98	02/23/00	06/30/00	07/02/01
District Public Defenders Conference	12/08/94	06/08/95	07/03/96	06/30/97	07/01/98	07/02/99	06/29/00	06/28/01
Department of Economic and Community Development	08/17/94	06/26/95	10/04/96	06/30/97	06/30/98 Revised 09/30/98	06/30/99	06/29/00	06/29/01
Department of Education	07/12/94 Revised 11/02/94	06/30/95	06/28/96	06/30/97	06/30/98	06/29/99	06/30/00	06/29/01 Revised 07/03/01
Department of Employment Security	07/14/94	06/30/95	06/27/96	05/01/97	06/30/98	06/30/99	Merged with Department of Labor	Merged with Department of Labor
Department of Environment and Conservation	12/21/94	06/30/95	06/28/96	07/01/97	06/30/98	06/30/99	06/30/00	06/29/01
Department of Finance and Administration	07/01/94 Revised 09/12/94	07/31/95	07/01/96	06/30/97	07/02/98	06/30/99	06/30/00	06/29/01

**Status of Title VI Implementation Plans
As of March 31, 2002 (Cont.)**

<u>State Entity</u>	<u>FY 95 Plan Submitted</u>	<u>FY 96 Plan Submitted</u>	<u>FY 97 Plan Submitted</u>	<u>FY 98 Plan Submitted</u>	<u>FY 99 Plan Submitted</u>	<u>FY 00 Plan Submitted</u>	<u>FY 01 Plan Submitted</u>	<u>FY 02 Plan Submitted</u>
Department of General Services	08/16/94 Revised 09/09/94 and 11/4/94	06/30/95 letter stated prior plan remained in effect	06/28/96	06/30/97	06/30/98	06/29/99	06/30/00	06/29/01
Department of Health	08/05/94 Revised 11/28/94	06/16/95	07/03/96	07/01/97	06/30/98	06/30/99	06/29/00	06/28/01
Department of Human Services	08/10/94	07/07/95 Revisions to follow	06/13/96	06/30/97	06/30/98	06/30/99	06/28/00	06/28/01
Council of Juvenile and Family Court Judges	06/30/94	06/30/95 ²	07/03/96	06/30/97 ²	06/30/98 ²	06/29/99 ²	07/18/00 ²	06/27/01 ²
Department of Labor and Workforce Development	07/05/94	06/29/95	09/06/96	07/01/97	08/07/98	06/30/99	06/20/00	06/26/01
Department of Mental Health and Developmental Disabilities	Entity indicated report pending per letter dated 06/30/94	07/5/94	06/28/95	07/03/96	07/01/97 Revised 1/29/98	06/30/98	06/30/99	07/02/01
Military Department	06/29/94 Revised 10/20/94	06/30/95 letter stated prior plan remained in effect	06/27/96	06/30/97 letter stated prior plan remained in effect	07/01/98	06/30/99	06/30/00	06/29/01
Board of Probation and Parole	NA ³	NA ³	NA ³	NA ³	NA ³	NA ³	06/30/00 Revised	06/29/01 Phase 1

² Covered by Commission on Children and Youth plan.

³ As Board of Paroles, reported no federal funds.

**Status of Title VI Implementation Plans
As of March 31, 2002 (Cont.)**

<u>State Entity</u>	<u>FY 95 Plan Submitted</u>	<u>FY 96 Plan Submitted</u>	<u>FY 97 Plan Submitted</u>	<u>FY 98 Plan Submitted</u>	<u>FY 99 Plan Submitted</u>	<u>FY 00 Plan Submitted</u>	<u>FY 01 Plan Submitted</u> 08/18/00	<u>FY 02 Plan Submitted</u>
Department of Revenue	Entity indicated report pending per letter dated 12/21/94	06/30/95	07/05/96	06/30/97	07/01/98	06/30/99	06/30/00	06/29/01
Department of Safety	06/30/94	06/30/95	06/28/96	06/26/97	12/01/98	06/28/99	06/29/00	07/02/01
Department of State	07/01/94 Revised 09/13/94	06/30/95	06/28/96	06/30/97	06/30/98	06/30/99	06/30/00	06/28/01
Tennessee Board of Regents	06/30/94 Revised 09/15/94 and 11/04/94	07/14/95 letter stated prior plan remained in effect	05/02/96	06/30/97	09/30/98	06/30/99	06/30/00	07/02/01
Tennessee Bureau of Investigation	11/28/94	06/30/95 Revised 12/20/95	07/05/96	06/30/97	06/30/98	06/24/99	06/08/00	06/20/01
Tennessee Higher Education Commission	11/21/94	06/30/95	07/01/96	06/24/97	07/14/98	07/01/99	06/30/00	07/02/01
Tennessee Housing Development Agency	06/30/94	06/29/95 letter stated prior plan remained in effect	07/01/96	06/30/97	07/08/98	07/01/99	06/29/00	06/29/01
Tennessee Human Rights Commission	12/08/94	08/04/95	10/14/96	12/15/97	07/01/98	06/30/99	06/29/00	06/28/01
Tennessee Regulatory Authority ⁴	06/30/94	06/30/95	07/24/96	07/02/97	06/30/98	06/30/99	06/30/00	06/29/01

⁴ FY 95 and FY 96 plans were submitted by the Public Service Commission

**Status of Title VI Implementation Plans
As of March 31, 2002 (Cont.)**

<u>State Entity</u>	<u>FY 95 Plan Submitted</u>	<u>FY 96 Plan Submitted</u>	<u>FY 97 Plan Submitted</u>	<u>FY 98 Plan Submitted</u>	<u>FY 99 Plan Submitted</u>	<u>FY 00 Plan Submitted</u>	<u>FY 01 Plan Submitted</u>	<u>FY 02 Plan Submitted</u>
Tennessee Student Assistance Corporation	06/30/94	07/28/95 letter updating prior plan	07/03/96	07/09/97	07/17/98	07/01/99	06/30/00	06/29/01
Tennessee Wildlife Resources Agency	06/30/94	06/30/95	07/02/96	07/10/97	11/24/98	06/30/99	06/29/00	06/29/01
Department of Transportation	08/15/94	07/10/95 letter stated prior plan remained in effect	05/31/96	06/30/97	06/30/98	06/30/99	06/30/00 Revised 07/10/00	06/29/01
Department of the Treasury	08/17/94 Revised 11/03/94	06/30/95 letter stated prior plan remained in effect Revised 08/17/95	08/23/96	01/06/97	11/17/98	07/01/99	06/30/00 Revised 08/29/00	09/20/01
University of Tennessee	12/15/94	06/19/95	08/08/96	06/09/97	06/19/98	06/14/99	06/14/00 Revised 7/24/00	10/26/01 Revised 9/28/01
Department of Veterans' Affairs	06/30/94 Revised 09/14/94	06/30/95	06/24/96	06/30/97	06/30/98	06/22/99	06/29/00	06/27/01

The following agencies have reported that they have no federal funds and, therefore, are not subject to Title VI requirements:

Office of the Attorney General and Reporter	Health Facilities Commission	Tennessee Advisory Commission on Intergovernmental Relations
Office of the Comptroller of the Treasury	Office of Legislative Administration	Tennessee Corrections Institute
Department of Financial Institutions	Obion-Forked Deer Basin Authority	Department of Tourist Development
Fiscal Review Committee	Department of Personnel	Executive Department

Title VI Complaints Reported

Appendix B

<u>Entity</u>	<u>FY 95</u>	<u>FY 96</u>	<u>FY 97</u>	<u>FY 98</u>	<u>FY 99</u>	<u>FY 00</u>	<u>FY 01</u>
Commission on Aging and Disability	-	-	-	-	-	-	-
Department of Agriculture	-	-	-	-	-	-	-
Alcoholic Beverage Commission	-	-	-	-	-	-	-
Arts Commission	-	-	-	-	-	-	-
Commission on Children and Youth	-	-	-	-	-	-	-
Department of Children's Services	-	-	-	-	1	-	-
Department of Commerce and Insurance	-	-	-	-	-	-	-
Department of Correction	-	-	199 ¹	198 ¹	260 ¹	236 ¹	313 ¹
Administrative Office of the Courts	-	-	-	-	-	-	-
District Attorneys General Conference	-	-	-	-	-	-	-
District Public Defenders Conference	-	-	-	-	-	-	-
Department of Economic and Community Development	-	-	-	-	1	-	-
Department of Education	2	2	2	1	1	-	-
Department of Employment Security	-	-	-	-	-	-	Merged with Dept. of Labor
Department of Environment and Conservation	-	-	-	1	-	-	-
Department of Finance and Administration (TennCare)	-	-	-	-	-	-	4
Department of General Services	-	1	-	-	-	-	-
Department of Health	-	-	-	-	5	-	-
Human Rights Commission	-	-	-	-	-	-	-
Department of Human Services	-	-	-	1	3	4	2
Council of Juvenile and Family Court Judges	-	-	-	-	-	-	-
Department of Labor and Workforce Development	-	-	-	-	-	-	-
Department of Mental Health and Developmental Disabilities	-	-	-	-	1	1	-
Military Department	-	-	-	-	-	-	-
Board of Probation and Parole	-	-	-	-	-	1	1
Department of Revenue	-	-	-	-	-	-	-
Department of Safety	-	-	-	-	-	-	-
Department of State	-	-	-	-	-	-	-
Tennessee Board of Regents	3	-	-	3	-	-	2

¹ Complaints filed by inmates.

Title VI Complaints Reported (Cont.)

Tennessee Bureau of Investigation	-	-	-	-	-	-	-
Tennessee Regulatory Authority	-	-	-	-	-	-	-
Tennessee Student Assistance Corporation	-	-	-	-	-	-	-
Tennessee Wildlife Resources Agency	-	-	-	-	-	-	-
Department of Transportation	-	-	-	2	1	2	2
Department of the Treasury	-	-	-	-	-	-	-
University of Tennessee	-	-	-	3	1	2	9
Department of Veterans' Affairs	-	-	-	-	-	-	-