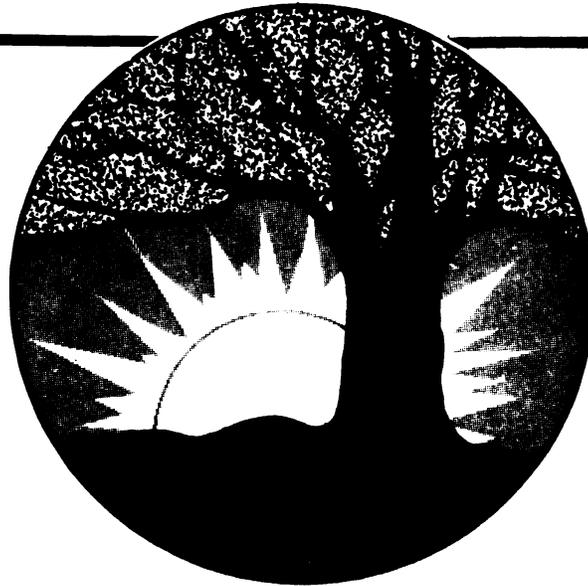


# PERFORMANCE AUDIT

## Middle Tennessee Community Services Agencies

Davidson County Community Services Agency  
Mid-Cumberland Community Services Agency  
Upper Cumberland Community Services Agency  
South Central Community Services Agency

May 2006



John G. Morgan  
Comptroller of the Treasury



State of Tennessee  
Comptroller of the Treasury  
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**COMPTROLLER OF THE TREASURY**  
State Capitol  
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John G. Morgan  
Comptroller

May 11, 2006

The Honorable John S. Wilder  
Speaker of the Senate  
The Honorable Jimmy Naifeh  
Speaker of the House of Representatives  
The Honorable Thelma M. Harper, Chair  
Senate Committee on Government Operations  
The Honorable Mike Kernell, Chair  
House Committee on Government Operations  
and  
Members of the General Assembly  
State Capitol  
Nashville, Tennessee 37243

Ladies and Gentlemen:

Transmitted herewith is the performance audit of the Middle Tennessee Community Services Agencies (CSAs)—Davidson County CSA, Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA. This audit was conducted pursuant to the requirements of Section 4-29-111, *Tennessee Code Annotated*, the Tennessee Governmental Entity Review Law.

This report is intended to aid the Joint Government Operations Committee in its review to determine whether these four CSAs should be continued, restructured, or terminated.

Sincerely,

John G. Morgan  
Comptroller of the Treasury

JGM/DWW  
[06-022]

State of Tennessee

# Audit Highlights

Comptroller of the Treasury

Division of State Audit

Performance Audit

## Middle Tennessee Community Services Agencies

Davidson County Community Services Agency

Mid-Cumberland Community Services Agency

Upper Cumberland Community Services Agency

South Central Community Services Agency

May 2006

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### AUDIT OBJECTIVES

The objectives of the audit were to determine the responsibilities of the entities as required by contracts with the Department of Labor and Workforce Development, one TennCare Managed Care Organization (BlueCross), and one TennCare Behavioral Health Organization (Magellan); to analyze board absenteeism, quorums, and the status of conflict-of-interest forms; to determine the extent of external oversight and contract performance monitoring by the departments of Labor and Workforce Development and Human Services, BlueCross, and Magellan; to determine the extent to which the Senior Community Service Employment Program is operating in accordance with the stated intent of federal Title V of the Older Americans Act; to determine whether the Family Services Counseling program is in compliance with contract and internal policy requirements; to determine the extent of contract compliance with requirements to monitor TennCare transportation providers; to determine compliance with Title VI of the Civil Rights Act of 1964; and to recommend possible alternatives for legislative or administrative action that may result in more efficient and effective operation of the agencies.

### FINDINGS

#### **Board Members Are Not Filing Annual Conflict-of-Interest Statements**

The boards for all three active CSAs (Mid-Cumberland, Upper Cumberland, and South Central) do not have a policy requiring annual signed conflict-of-interest disclosure statements and have members serving who have not signed conflict-of-interest state-

ments or whose signed statements are at least two years old. Annual written disclosures of financial interests, prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions help ensure the board is acting on the state's behalf and that board members are

recusing themselves from decision-making as needed (page 19).

**Board Policies Regarding Vacancies, Quorums, and Member Documentation Should Be Adhered to and/or Revised**

All three active CSAs (Mid-Cumberland, Upper Cumberland, and South Central) have multiple board vacancies, some officially vacant through resignation or death and others through the non-attendance of the members. Many of these board positions have been vacant for more than two years. This has resulted in Mid-Cumberland's and Upper Cumberland's boards conducting business at times without a quorum, which is against the boards' policies. While all three CSA boards' policies provide for board member participation by telephone, there is no provision for the removal of a board member because of absence or failure to perform the duties of the office. Also, the terms of most of the currently serving board members have expired, requiring reappointments or new appointments by the Governor's Office. South Central CSA does not maintain files on its board members with biographical information, appointment letters, resignation letters, and conflict-of-interest statements (page 21).

**South Central CSA Should Ensure That It Has Effective Policies and Procedures for Monitoring Its Vendors for Compliance With Title VI**

South Central CSA, which has not had any contracts for its DCS programs since September 1, 2005, also does not have formal policies and procedures in place for

monitoring vendors for compliance with Title VI. Without monitoring procedures, South Central CSA cannot ensure that it and its contractors are in compliance with Title VI (page 26).

**TennCare Transportation Program Vendor Files Do Not Contain Necessary Documentation as Required by Contract and Internal Policy**

At all three CSAs (Mid-Cumberland, Upper Cumberland, and South Central), some vendor files did not contain documentation of driving and criminal background checks, driver performance evaluations, business or ambulance service licenses, and liability insurance. Without complete documentation, the CSAs cannot properly oversee the operations of the TennCare Transportation program and safeguard the program's clients (page 27).

**Upper Cumberland CSA's Family Services Counseling Program Personnel Files Do Not Contain Documentation Required by Contract, Agency Policy, and Best Practices**

Through a contract with DHS, the Family Services Counseling program at Upper Cumberland CSA offers case management and counseling to Families First participants in order to help them comply with their Families First work plan and become financially independent of welfare. However, some personnel files of program staff did not contain signed conflict-of-interest statements, background checks, and documentation of an earned master's degree (page 30).

**OBSERVATIONS AND COMMENTS**

The audit also discusses the following issues: (1) the Department of Finance and Administration commissioner serving on the CSAs' boards, (2) conflicts between annual report and financial statement requirements, (3) new programs and the future viability of the CSAs, and (4) the results of additional audit work (pages 13-18).

## **ISSUES FOR LEGISLATIVE CONSIDERATION**

The General Assembly may wish to consider (1) amending state law to provide for the removal of board members with excessive or consecutive absences and (2) amending Section 37-5-305(b), *Tennessee Code Annotated*, based upon the advice of the Attorney General, to remove the Commissioner of Finance and Administration or the commissioner's representative from serving as a voting member on rural CSA boards. Section 37-5-305(j), *Tennessee Code Annotated*, would limit the commissioner's participating in the majority of CSA business (page 33).

**Performance Audit**  
**Middle Tennessee Community Services Agencies**  
Davidson County Community Services Agency  
Mid-Cumberland Community Services Agency  
Upper Cumberland Community Services Agency  
South Central Community Services Agency

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**Performance Audit**  
**Middle Tennessee Community Services Agencies**  
**Davidson County Community Services Agency**  
**Mid-Cumberland Community Services Agency**  
**Upper Cumberland Community Services Agency**  
**South Central Community Services Agency**

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**INTRODUCTION**

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**PURPOSE AND AUTHORITY FOR THE AUDIT**

This performance audit of Davidson County Community Services Agency (CSA), Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA was conducted pursuant to the Tennessee Governmental Entity Review Law, *Tennessee Code Annotated*, Title 4, Chapter 29. Under Section 4-29-227, these four agencies are scheduled to terminate June 30, 2006. The Comptroller of the Treasury is authorized under Section 4-29-111 to conduct a limited program review audit of these agencies and to report to the Joint Government Operations Committee of the General Assembly. The audit is intended to aid the committee in determining whether these four CSAs should be continued, restructured, or terminated.

**OBJECTIVES OF THE AUDIT**

The objectives of the audit were

1. to determine the responsibilities of the entities as required by contracts with the Department of Labor and Workforce Development, one TennCare Managed Care Organization (BlueCross), and one Behavioral Health Organization (Magellan);
2. to analyze board absenteeism, quorums, and the status of conflict-of-interest forms;
3. to determine the extent of external oversight and contract performance monitoring by the departments of Labor and Workforce Development and Human Services, BlueCross, and Magellan;
4. to determine the extent to which Mid-Cumberland CSA is operating the Senior Community Service Employment Program in compliance with Title V of the federal Older Americans Act program;
5. to determine whether the Family Services Counseling program operated by Upper Cumberland CSA is in compliance with contract and internal policy requirements;
6. to determine the extent of contract compliance with requirements to monitor TennCare transportation providers;
7. to determine compliance with Title VI of the Civil Rights Act of 1964; and

8. to recommend possible alternatives for legislative or administrative action that may result in more efficient and effective operation of the agencies.

## **SCOPE AND METHODOLOGY OF THE AUDIT**

The activities of Mid-Cumberland Community Services Agency (CSA), Upper Cumberland CSA, and South Central CSA were reviewed for the period July 1, 2003, to June 30, 2005. Davidson County CSA ceased operations before the audit began; therefore, no audit work was performed. The audit was conducted in accordance with the standards applicable to performance audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and included

1. review of applicable legislation and internal, personnel, and program policies and procedures;
2. examination of board policies and minutes;
3. examination of the entity's contracts, records, reports, and information summaries; and
4. interviews with agency staff and staff of other state agencies that interact with the agency.

## **HISTORY AND STATUTORY RESPONSIBILITIES**

The Community Services Agency Act of 1996 replaced the 12 community health agencies that were assisting the Tennessee Department of Health with delivery of health care to the state's indigent citizens with community services agencies (CSAs). The purpose of these agencies was to coordinate funds and programs designated for care of children and other citizens in the state. The mission of CSAs also broadened to include a range of services that were needed by families and children, designed with the overall purpose of keeping children and youth from entering state custody. In keeping with this change of emphasis, the CSAs began reporting to the Department of Children's Services (DCS) instead of the Department of Health.

An additional change resulted from a study conducted in 1999 by the Child Welfare League of America (CWLA) under contract with DCS. In its assessment of the foster care system in Tennessee, CWLA recommended that the roles and responsibilities of DCS and the CSAs be separated. It became apparent that the strength of DCS was working with children in state custody and the strength of the CSAs was providing diversion, intervention, and prevention services for children at risk of entering state custody. The CSA structure, as a political subdivision of the state, enabled the agencies to serve children and families in crisis and secure in-home and community services quickly, thereby delaying or preventing a child's placement in state custody. In 2001, DCS transferred non-custodial (i.e., diversion, intervention, and prevention) services to CSAs throughout the state.

In 2005, DCS made the decision to provide these services in-house and cease contracting with the 12 CSAs. This transfer of services and staff from the 12 CSAs was accomplished in stages during 2005, with completion of the last transfer occurring December 1, 2005. Most of the CSA staff associated with DCS programs were transferred into DCS. Three CSAs (Davidson County, Knox County, and Hamilton County) ceased operations due to the loss of the DCS contract. At the same time, in keeping with this change of emphasis, statute was revised to have the nine remaining CSAs report to the Department of Finance and Administration (F&A) rather than DCS.

## **ORGANIZATION, REVENUES, AND EXPENDITURES**

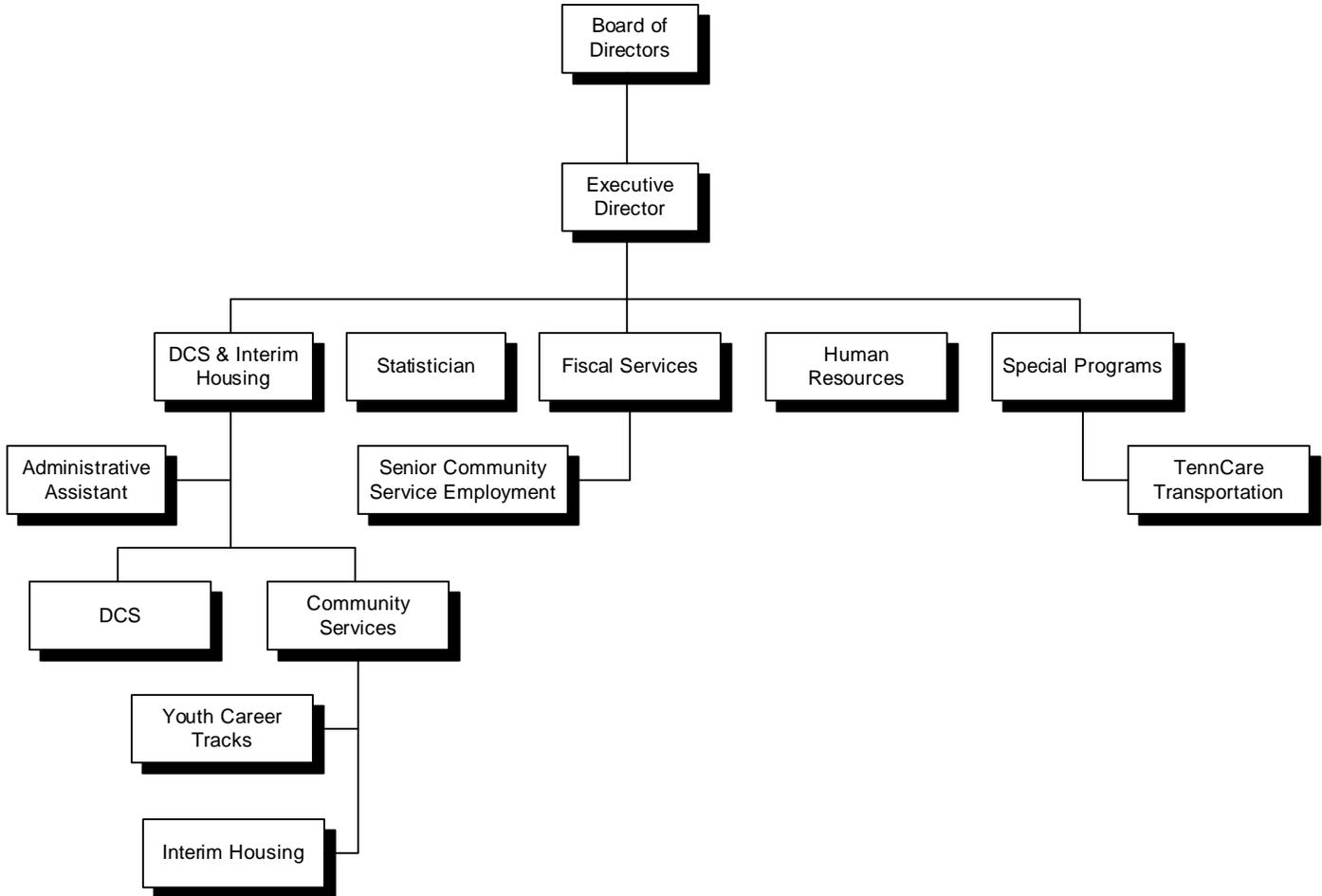
### Mid-Cumberland CSA

Mid-Cumberland CSA, a non-profit organization that is also a political subdivision and instrumentality of the state, serves 12 counties: Cheatham, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, and Wilson. Its administrative office is in Nashville, Tennessee, with satellite offices in Clarksville, Murfreesboro, and Gallatin. A 13-member board of directors, 12 of whom are appointed by the Governor, governs Mid-Cumberland CSA. The 13<sup>th</sup> member was the Commissioner of the Department of Children's Services (DCS) until July 1, 2005, when the Commissioner of Finance and Administration (F&A) assumed the position. Statute states that "members of each board shall be appointed with a conscious intention of reflecting a diverse mixture with respect to race and gender." At Mid-Cumberland CSA, three of seven current office holders are black; all are female. Based on information from the 2000 U.S. Census, the 12 counties served by Mid-Cumberland CSA have a combined average minority population of 7%. The agency's programs are carried out by approximately 117 staff under the supervision of the executive director, who was appointed by the Commissioner of DCS and now F&A, subject to the approval of the board. Employees and board members are considered state employees in the sense that they are eligible for certain state benefits such as state liability coverage, legal representation, and participation in state retirement and health plans. However, they are not covered by civil service provisions. (See organization chart on the following page.)

The agency's programs operating between July 1, 2003, and June 30, 2005, were as follows.

Child and Family Services. This DCS program, which fully integrated into DCS and out of Mid-Cumberland CSA on December 1, 2005, delivered services to children who had been in state custody and who could return home with post-custody services or who were deemed to be at imminent risk of entering state custody. The goals of the program were to keep children and communities safe while providing supportive services that allowed these children to maintain significant relationships with family, school, and community. Children who received these services were referred by DCS or the local court system. The integration of this program into DCS resulted in a reduction of 67 employees at the CSA.

**Mid-Cumberland CSA  
Organization Chart  
November 2005**



TennCare Transportation. Through contractual arrangements with BlueCross and Magellan (the TennCare Managed Care and Behavioral Health Organizations), Mid-Cumberland CSA provides administrative services for a program designed to provide non-emergency transportation services for TennCare recipients in its 12 counties plus Davidson County to and from covered health and behavioral services. Mid-Cumberland CSA organizes a network of providers, performs eligibility determinations, schedules transportation services, and verifies contractual rates and submits invoices for transportation vendors. (The MCO or BHO actually pays the vendor.) In return for these services, BlueCross and Magellan pay Mid-Cumberland CSA a monthly administrative fee for each of their TennCare enrollees.

Senior Community Service Employment Program. This program, authorized by Title V of the Older Americans Act of 1965 and coordinated with the state Department of Labor and Workforce Development, provides useful part-time community service and private-sector employment for persons with low incomes who are 55 years old or older and live in nine designated counties in the Mid-Cumberland and Northwest regions. The program provides eligible individuals with wages, skill acquisition or enhancement, and assistance to unsubsidized employment where possible and other benefits as approved by the Department of Labor and Workforce Development. Participants (32 of 42 positions as of October 11, 2005) are given part-time work assignments with community, state, or other non-profit agencies, where they receive on-the-job training in an area of interest. The work assignments are intended to serve as transitional employment while the participants seek either part- or full-time unsubsidized employment; however, the participants are allowed to remain in the program indefinitely as long as they meet the age and income requirements.

Community Development Services. Funded by local agencies and private foundations, Mid-Cumberland CSA works with locally elected officials and interested community groups in its service region to (a) identify risk factors which predispose children and youth to enter state custody; and (b) identify strategies, actions, and services which can be used on the local level to prevent and/or intervene in situations where children or youth are at risk of being placed in state custody or of returning to state custody. Mid-Cumberland CSA intends to continue this program with broader goals than just the needs of children and youth.

Youth Career Tracks. This program, funded by the North Tennessee Workforce Board, assists qualified youth to overcome obstacles to employment and move through secondary school to post-secondary training, ending in placements in full-time employment.

**Mid-Cumberland CSA  
Revenues by Source  
For the Fiscal Year Ending June 30, 2005**

<i>Source</i>	<i>Amount</i>	<i>% of Total</i>
Department of Children's Services	\$7,757,284.78	87.5%
TennCare MCO/BHO	705,033.42	8.0%
County Government	1,853.65	0.0%
Tennessee Commission on Aging	289,000.30	3.3%
Workforce Essentials	97,123.49	1.1%
Interest	6,762.19	0.1%
<b>Total Revenues</b>	<b>\$8,857,057.83</b>	<b>100.0%</b>

Source: Unaudited financial statement for fiscal year 2005, Mid-Cumberland CSA.

**Mid-Cumberland CSA  
Expenditures by Account  
For the Fiscal Year Ending June 30, 2005**

<i>Account</i>	<i>Amount</i>	<i>% of Total</i>
Administration	\$ 751,043.62	8.5%
Child and Family Case Management	5,204,217.82	58.5%
Child and Family Services	1,966,858.96	22.2%
TennCare Transportation	564,322.38	6.4%
Senior Community Services	289,000.30	3.3%
Workforce Essentials	97,123.49	1.1%
<b>Total Expenditures</b>	<b>\$8,872,566.57</b>	<b>100.0%</b>

Source: Unaudited financial statement for fiscal year 2005, Mid-Cumberland CSA.

**Mid-Cumberland CSA  
Changes in Fund Balance**

	For Fiscal Year 2004	For Fiscal Year 2005
Fund Balance, June 30	\$304,016.92	\$288,508.18

Source: Unaudited financial statement for fiscal year 2005, Mid-Cumberland CSA.

## Upper Cumberland CSA

Upper Cumberland CSA, a non-profit organization that is also a political subdivision and instrumentality of the state, serves 14 counties: Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, and White. Its administrative office is in Cookeville, Tennessee. A 15-member board of directors, 14 of whom are appointed by the Governor, governs Upper Cumberland CSA. The 15<sup>th</sup> member was the Commissioner of the Department of Children’s Services (DCS) until July 1, 2005, when the Commissioner of Finance and Administration (F&A) assumed the position. Statute states that “members of each board shall be appointed with a conscious intention of reflecting a diverse mixture with respect to race and gender.” At Upper Cumberland CSA, there is no minority representation on the board; nine members are female, three male. Based on information from the 2000 U.S. Census, the 14 counties served by Upper Cumberland CSA have a combined average minority population of 1%. The agency’s programs are carried out by approximately 26 staff under the supervision of the executive director, who was appointed by the Commissioner of DCS and now F&A, subject to the approval of the board. Employees and board members are considered state employees in the sense that they are eligible for certain state benefits such as state liability coverage, legal representation, and participation in state retirement and health plans. However, they are not covered by civil service provisions. (See organization chart on the following page.)

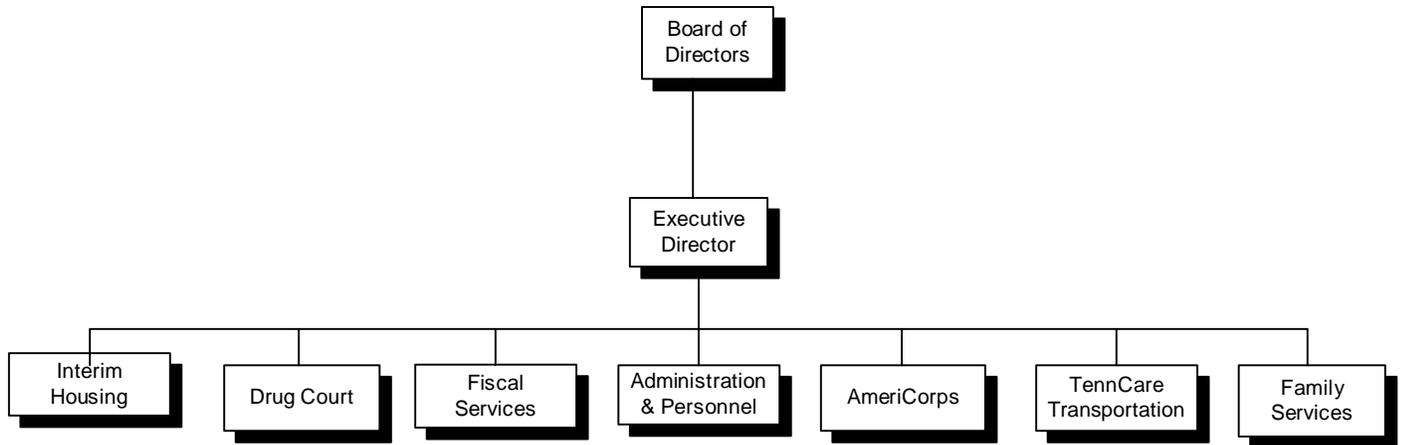
The agency’s programs operating between July 1, 2003, and June 30, 2005, were as follows.

Child and Family Services. This DCS program—already fully integrated back into DCS and out of Upper Cumberland CSA as of September 1, 2005—delivered services to children who had been in state custody and who could return home with post-custody services or who were presently deemed to be at imminent risk of entering state custody. The goals of the program were to keep children and communities safe while providing supportive services that allowed these children to maintain significant relationships with family, school, and community. Children who received these services were referred by DCS or the local court system. The integration of the program into DCS resulted in a reduction of 42 employees at the CSA.

TennCare Transportation. Through contractual arrangements with BlueCross and Magellan (TennCare MCO/BHOs), Upper Cumberland CSA provides administrative services for a program designed to provide non-emergency transportation services for TennCare recipients to and from covered health and behavioral services. Upper Cumberland CSA organizes a network of providers, performs eligibility determinations, schedules transportation services, and verifies contractual rates and submits invoices for transportation vendors. (The MCO or BHO actually pays the vendor.) In return for these services, BlueCross and Magellan pay Upper Cumberland CSA a monthly administrative fee for each of their TennCare enrollees.

Family Services Counseling. This program, funded by DHS, is designed to provide intensive home-based services to recipients of the Temporary Assistance for Needy Families (TANF) Program in an effort to move them from welfare to productive employment. Staff provide

**Upper Cumberland CSA  
Organization Chart  
November 2005**



counseling and intervention to assist these families in dealing with domestic violence, alcohol and drug abuse, and mental health issues.

AmeriCorp. Upper Cumberland CSA administers AmeriCorp grant funds in a collaborative relationship with five local education authorities to provide 26 volunteers for use in elementary schools to work with at-risk children and their families.

Community Youth Development Program. This program, funded primarily by the Tennessee Commission on Children and Youth, is designed to improve and enhance access to essential physical, mental, and social health care needs for at-risk children and families.

**Upper Cumberland CSA  
Revenues by Source  
For the Fiscal Year Ending June 30, 2005**

<i>Source</i>	<i>Amount</i>	<i>% of Total</i>
State grants and contracts	\$3,234,002.02 *	76.1%
Federal grants and contracts	681,667.66 *	16.0%
Local grants and contracts	58,295.42	1.4%
TennCare Transportation contracts	260,035.01	6.1%
Other Income	11,105.00	0.3%
Interest	6,106.40	0.1%
<b>Total Revenues</b>	<b>\$4,251,211.51</b>	<b>100.0%</b>

\* Amounts from individual agencies/departments were not available.

Source: Unaudited financial statement for fiscal year 2005, Upper Cumberland CSA.

**Upper Cumberland CSA  
Expenditures by Account  
For the Fiscal Year Ending June 30, 2005**

<i>Account</i>	<i>Amount</i>	<i>% of Total</i>
Administration	\$ 395,192.16	9.3%
Child and Family Case Management	1,794,196.00	42.0%
Child and Family Services	1,122,289.97	26.3%
DHS Special Needs Program	358,070.42	8.4%
TennCare Transportation	209,977.21	4.9%
AmeriCorp SAPP	209,264.25	4.9%
AmeriCorp Promise Fellows	12,298.90	0.3%
Community Services	166,537.55	3.9%
<b>Total Expenditures</b>	<b>\$4,267,826.46</b>	<b>100.0%</b>

Source: Unaudited financial statement for fiscal year 2005, Upper Cumberland CSA.

**Upper Cumberland CSA  
Changes in Fund Balance**

	For Fiscal Year 2004	For Fiscal Year 2005
Fund Balance, June 30	\$393,270.25	\$376,655.30

Source: Unaudited financial statement for fiscal year 2005, Upper Cumberland CSA.

South Central CSA

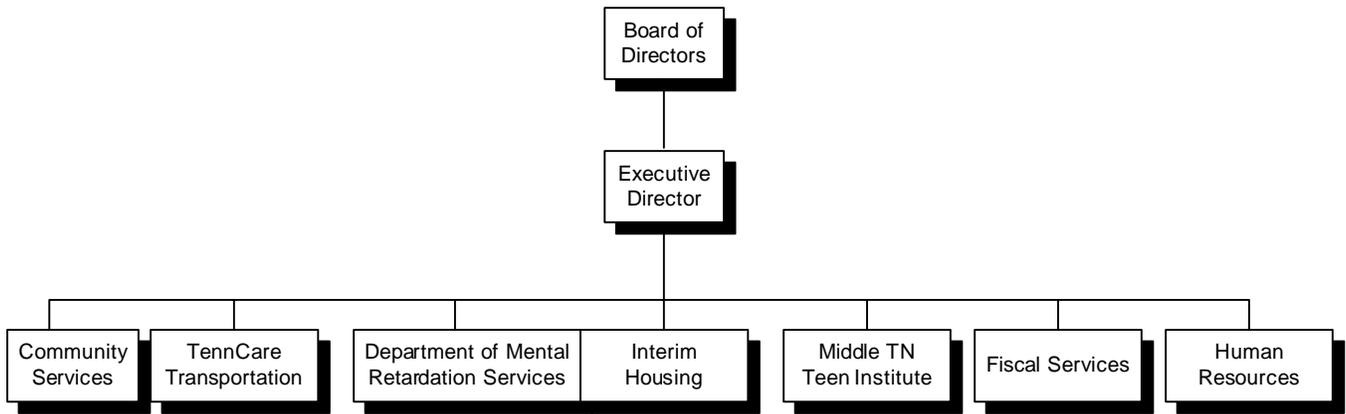
South Central CSA, a non-profit organization that is also a political subdivision and instrumentality of the state, serves 12 counties: Bedford, Coffee, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne. Its administrative office is in Columbia, Tennessee. South Central CSA is governed by a 13-member board of directors, 12 of whom are appointed by the Governor. The 13<sup>th</sup> member was the Commissioner of the Department of Children’s Services (DCS) until July 1, 2005, when the Commissioner of Finance and Administration (F&A) assumed the position. Statute states that “members of each board shall be appointed with a conscious intention of reflecting a diverse mixture with respect to race and gender.” At South Central CSA, there is no minority representation on the board; eight members are female, three male. Based on information from the 2000 U.S. Census, the 12 counties served by South Central CSA have a combined average minority population of 6%. The agency’s programs are carried out by 18 staff under the supervision of the executive director, who was appointed by the Commissioner of DCS, now F&A, subject to the approval of the board. Employees and board members are considered state employees in the sense that they are eligible for certain state benefits such as state liability coverage, legal representation, and participation in state retirement and health plans. However, they are not covered by civil service provisions. (See organization chart on the following page.)

The agency’s programs operating between July 1, 2003, and June 30, 2005, were as follows.

Child and Family Services. This DCS program—already fully integrated back into DCS and out of South Central CSA as of September 1, 2005—delivered services to children who had been in state custody and who could return home with post-custody services or who were presently deemed to be at imminent risk of entering state custody. The goals of the program were to keep children and communities safe while providing supportive services that allowed these children to maintain significant relationships with family, school, and community. Children who received these services were referred by DCS or the local court system. The integration of the program into DCS resulted in a reduction of 28 employees at the CSA.

TennCare Transportation. Through contractual arrangements with BlueCross and Magellan (TennCare MCO/BHOs), South Central CSA provides administrative services for a program designed to provide non-emergency transportation services for TennCare recipients to and from covered health and behavioral services. South Central CSA organizes a network of providers, performs eligibility determinations, schedules transportation services, and verifies contractual rates and submits invoices for transportation vendors. (The MCO or BHO actually pays the

**South Central CSA  
Organization Chart  
November 2005**



vendor.) In return for these services, BlueCross and Magellan pay South Central CSA a monthly administrative fee for each of their TennCare enrollees.

Middle Tennessee Teen Institute. The institute, funded by the Department of Health and participant fees, is a primary prevention activity to decrease the instances of adolescent substance abuse, inappropriate sexual activity, STDs, violence, vehicular misconduct, and other negative behaviors. The institute provides a week-long summer residential training program for teenage community leaders and results in the participants' subsequent application of the skills learned at the event in their home communities throughout the following year.

Community Services Program. This program, funded by the CSA's fund balance, is designed to improve and enhance access to products and services such as, but not limited to, activity designed to educate, motivate, and empower communities within the region to undertake locally specific efforts to reduce the numbers of children committed to DCS custody. Community Youth Councils are organized and operated with the program's support to assess the needs of the community's children and families for prevention, intervention, diversion, and other support services, which may reduce the risk of youth entering state custody. The councils then formulate plans to make needed services available to local residents, recruit and secure local commitment to the proposed efforts, garner the financial and other resources deemed necessary for implementation, and then direct and monitor their projects' outcomes.

**South Central CSA  
Revenues by Source  
For the Fiscal Year Ending June 30, 2005**

<i>Source</i>	<i>Amount</i>	<i>% of Total</i>
Department of Children's Services	\$ 2,903,308.49	88.2%
TennCare MCO/BHO	265,107.48	8.1%
Department of Health	107,579.82	3.3%
Current Services Middle Tennessee Teen Institute	8,040.00	0.2%
Interest	6,396.55	0.2%
<b>Total Revenues</b>	<b>\$3,290,432.34</b>	<b>100.0%</b>

Source: Unaudited financial statement, South Central CSA FY05 Annual Report.

**South Central CSA  
Expenditures by Account  
For the Fiscal Year Ending June 30, 2005**

<i>Account</i>	<i>Amount</i>	<i>% of Total</i>
Administration	\$ 288,265.90	8.9%
Child and Family Case Management	1,638,866.67	50.7%
Child and Family Services	987,912.82	30.6%
TennCare Transportation	189,162.75	5.9%
Children's Special Services	43,685.99	1.4%
Middle Tennessee Teen Institute	57,899.76	1.8%
Community Services	23,519.87	0.7%
<b>Total Expenditures</b>	<b>\$3,229,313.76</b>	<b>100.0%</b>

Source: Unaudited financial statement, South Central CSA FY05 Annual Report.

**South Central CSA  
Changes in Fund Balance**

	For Fiscal Year 2004	For Fiscal Year 2005
Fund Balance, June 30	\$ 460,549.37	\$ 521,667.95

Source: Unaudited financial statement, South Central CSA FY05 Annual Report.

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**OBSERVATIONS AND COMMENTS**

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The topics discussed below did not warrant a finding but are included in this report because of their effect on the operations of Mid-Cumberland Community Services Agency (CSA), Upper Cumberland CSA, and/or South Central CSA and on the citizens of Tennessee.

**DEPARTMENT OF FINANCE AND ADMINISTRATION COMMISSIONER ON THE BOARD**

By law, Mid-Cumberland CSA's board consists of 13 voting members; Upper Cumberland's, 15; and South Central's, 13. All but one of the persons on each board represent the counties served by the respective CSA. The final member is the Commissioner of the Department of Finance and Administration (F&A) or the commissioner's designee.

The duties of the commissioner as either a CSA board member or the chief executive of F&A are frequently interrelated. As a board member, the commissioner can vote on all CSA business, including the adoption of policies and procedures governing the CSA's internal

operations; the making and executing of contracts; and the receiving, administering, allocating, and disbursing of funds made available under any federal or state assistance program. As the chief executive, the commissioner appoints the CSA's executive director with the approval of the CSA's board of directors. The commissioner also approves any CSA policies, procedures, or rules and regulations proposed by the board of directors, as well as all contracts for the purchase of services or the acquisition or improvement of real property. Furthermore, the commissioner is responsible for the review and approval of the CSA's plan of operation submitted in accordance with Section 37-5-310, *Tennessee Code Annotated*.

Because F&A is the primary funding source of the agencies, many of the issues and decisions brought to the CSA boards of directors relate to F&A. It appears that the commissioner's or designee's participation in these discussions or voting on matters relating to F&A services violates Section 37-5-305(j), *Tennessee Code Annotated*, which states,

If any matter before the board involves a project, transaction or relationship in which a member or the member's associated institution, business or board has a direct or a conflicting interest, the member shall make known to the board that interest and shall be prohibited from participating in discussions and voting on that matter.

The Commissioner of F&A should require his representatives to recuse themselves from CSA board votes. The Commissioner of F&A and the CSAs should seek the advice of the Attorney General regarding the commissioner's role on the board of directors. The General Assembly may wish to consider amending Section 37-5-305(b), *Tennessee Code Annotated*, based upon the advice of the Attorney General, to remove the Commissioner of F&A or the commissioner's representative from serving as voting members on rural CSA boards as this appears inconsistent with Section 37-5-305(j), *Tennessee Code Annotated*, which would limit the commissioner's participation in the majority of CSA business.

## **CONFLICTS BETWEEN ANNUAL REPORT AND FINANCIAL STATEMENT REQUIREMENTS**

By contract with the Department of Children's Services (DCS), the CSAs were supposed to submit to the Commissioner of DCS an annual report with audited financial statements within nine months after the close of the fiscal year. However, a DCS rule dating from 2002 requires CSAs to submit an annual report on the preceding fiscal year's activities and financial transactions within 60 days of receipt of a final audit report by the Comptroller of the Treasury. This rule has resulted in extremely late issuance of annual reports by some CSAs. (See also the October 2004 performance audits of Northwest CSA and Southwest CSA.) Upper Cumberland CSA released its annual report for fiscal year 2003 on October 24, 2005. Two of the Middle Tennessee CSAs (Mid-Cumberland and South Central) have not waited for audited financial statements to issue their annual reports for either fiscal years 2004 or 2005.

Since DCS has not been monitoring CSA compliance with annual report and audited financial statement requirements, the purpose of these requirements by DCS is unclear. Timely submission of annual reports and audited financial statements is essential to good oversight,

fiscal stewardship, and strategic planning by the agency's staff and board as well as contracting entities.

As of July 1, 2005, the CSAs no longer reported administratively to DCS but to the Department of Finance and Administration (F&A). By December 1, 2005, DCS will no longer have contracts with the CSAs. Therefore, F&A should determine what information should be included in CSA annual reports, determine the reports' due date, and F&A should revise Rule 0250-7-6-.05(8) to reflect F&A requirements in its grant contract with the CSAs. F&A should also ensure that its liaison with the CSAs has an appropriate monitoring tool to determine whether CSAs submit annual reports in a timely fashion and with all necessary information.

## **NEW PROGRAMS AND FUTURE VIABILITY**

On July 1, 2005, the Department of Children's Services (DCS) began the process of transitioning services back into DCS that had been contracted out to the community services agencies (CSAs). This 4-stage process was completed on December 1, 2005. The DCS contract accounted for 70-100% of funding for the four Middle Tennessee CSAs. With the loss of this funding, all nine currently active CSAs have been pursuing other potential sources of funding and as a group have hired The Ingram Group, a consulting firm, at \$6,000 a month, to assist them in marketing themselves to private and other government agencies. Since three of the four urban CSAs have ceased operations because their only funding came from DCS, it is uncertain whether the remaining nine CSAs will be stable and financially viable entities in the future.

### Interim Sheltering Services

The August 2005 devastation caused by Hurricane Katrina and the arrival of evacuees in Tennessee created an immediate need for adequate food and sheltering. Beyond the immediate needs resulting from this crisis, evacuees required continued support, commitment, and services to address the long-term issue of rebuilding their lives. Acting on behalf of the state, the nine CSAs became the state point of contact to aid evacuees in obtaining interim sheltering and associated services. The Department of Finance and Administration's (F&A) Office of Criminal Justice Programs established grant contracts for case management with the nine CSAs for one year beginning August 29, 2005. The grant contracts are 100% federally reimbursable from the Federal Emergency Management Agency (FEMA) as a result of President Bush's provision of an emergency declaration for the state following Hurricane Katrina.

Evacuees will receive assistance securing stable interim housing, household furnishings, and case management services to support their interim sheltering needs. The CSAs will provide a coordinated system of assessment, case management, and procurement of goods and services to support individual/family placement in interim sheltering for individuals evacuated from the coastal areas of Louisiana, Mississippi, and Alabama. For those individuals/families who do not choose to establish interim sheltering in Tennessee, assistance will be provided in relocating families to other communities in other states. In the spring of 2006, FEMA plans to move hurricane evacuees into another federal housing program in which state and local governments do not participate.

## TennCare Transportation Services

Various MCOs and BHOs contract with all nine of the CSAs to oversee the TennCare Transportation program in their regions. TennCare plans to consolidate its non-emergency transportation services into a single vendor system. A request for proposal (RFP) is under development, and the state expects to open the bidding process as early as May 2006. Non-emergency transportation services include picking up TennCare members with no other transportation option to meet their scheduled doctor appointments. Currently, non-emergency transportation is provided by the TennCare Bureau's nine different managed care and behavioral healthcare organizations, all with varying transportation delivery systems. Under the new transportation broker system, the MCOs and BHOs would contract with one company to provide total system oversight including eligibility screening, vehicle inspections, driver certifications, scheduling, a centralized transportation call center, and billing to ensure uniform, quality service delivery. According to Bureau of TennCare officials, this single vendor system will improve the TennCare program's ability to audit transportation services, eliminate fragmentation, and provide easier access to important utilization data.

## Division of Mental Retardation Services Case Management

Eight of the nine CSAs (Northeast, East, Southeast, South Central, Upper Cumberland, Northwest, Southwest, and Mid-Cumberland) have contracts with or are in the process of applying and contracting with F&A's Division of Mental Retardation Services (DMRS) to provide case management services for mentally retarded individuals under the Medicaid waiver. The program is a result of a contract between TennCare and DMRS and is designed to assist individuals with mental retardation to live as independently as possible within their communities.

## **RESULTS OF ADDITIONAL AUDIT WORK**

### External Oversight of CSA Programs

TennCare Transportation. Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA contract with BlueCross and Magellan for their TennCare Transportation programs. This program was designed to provide non-emergency transportation services for TennCare recipients to and from health-related appointments. Through contracts with BlueCross and Magellan, the CSAs provide administrative services for the program. The CSAs are responsible for organizing and overseeing a network of conventional automobile and non-emergency ambulatory vendors, performing eligibility determinations for TennCare recipients interested in using the program, and approving payments to transportation vendors. BlueCross and Magellan are responsible for making the actual payments to the vendors. The CSAs receive a monthly fee for service from both BlueCross and Magellan that is based upon the number of TennCare enrollees in their designated region. The CSAs are responsible for maintaining the necessary documentation for each vendor according to the contract. However, the CSAs are not required to conduct on-site reviews of the vendors.

The CSAs are required to submit quarterly reports to BlueCross with statistical information such as the number of trips scheduled, trips by vendor, and the number of cancellations. In addition, BlueCross conducts a yearly audit of the TennCare Transportation program. The audit tools used by both BlueCross and Magellan are provided to the CSAs prior to the commencement of the audit.

The 2004 BlueCross audit of *Mid-Cumberland CSA* recognized the program as 98% compliant and made a recommendation for the agency to take immediate action to suspend trips for any vendor and/or driver that is non-compliant; the 2005 audit recognized the program as 100% compliant and disclosed no findings and no recommendations. Magellan does not conduct a regular yearly audit; however, audits were conducted in 2004 and 2005. The 2004 audit scored the program as 92% compliant. The following areas needing improvement were noted in the audit:

- Criminal Background Checks: Copy of vehicle operator's current criminal background check prior to employment and every five years thereafter for each vehicle operator.
- Pre-Service Training: Documentation that each vehicle operator has successfully completed, at a minimum, four hours of pre-service training.
- In-Service Training: Documentation that each vehicle operator has successfully completed, at a minimum, four hours of in-service training every six months.
- Mechanical Safety Inspections: Documentation of mechanical safety inspections for each vehicle including, but not limited to, seat belts and child restraints.
- Policies and Procedures: Documentation of the following policies and procedures updated on an annual basis: Disaster Recovery Plan, Hazardous Travel Conditions, and Reporting Member Fraud and Abuse.

The 2005 Magellan audit scored the Mid-Cumberland program as 100% compliant.

The 2005 BlueCross audit of *Upper Cumberland CSA* recognized the program as 100% compliant and disclosed no findings and no recommendations. Magellan does not conduct a regular yearly audit, but the most recent audit was conducted in July 2005. According to Magellan, the results of the audit have not yet been finalized.

For fiscal years 2004 and 2005, the BlueCross audits of *South Central CSA* disclosed no findings and no recommendations for the program. Magellan does not conduct a regular yearly audit; however, audits were conducted in 2004 and 2005. The 2004 audit documented the program as 93% compliant and disclosed the following information as opportunities for improvement:

- Photo Identification Tags: Signed documentation by each vehicle operator that is issued a photo ID tag that includes the operator's and vendor's names.
- Criminal Background Checks: Copy of vehicle operator's current criminal background check prior to employment and every five years thereafter for each vehicle operator.

- **In-Service Training:** Documentation that each vehicle operator has successfully completed, at a minimum, four hours of in-service training every six months.
- **Policies and Procedures:** Documentation of the following policies and procedures updated on an annual basis: Disaster Recovery Plan, Hazardous Travel Conditions, and Reporting Member Fraud and Abuse.

The 2005 Magellan audit found the program 100% compliant.

Senior Employment Services. Mid-Cumberland CSA's Senior Community Service Employment Program (SCSEP) is designed to help those individuals who are 55 and older with little or no employment prospects. The program provides transitional, part-time employment for the participants and aids them in finding unsubsidized part- or full-time employment. The state Department of Labor and Workforce Development is responsible for overseeing SCSEP at Mid-Cumberland CSA. The department receives statistical reports from the program every month that contain information regarding gender, race, age, and hourly wage. The SCSEP program director also provides the department with quarterly reports detailing what activities the director has been involved in that relate to the program's promotion and continuance. The department also may directly access at any time the program database that is provided by the U.S. Department of Labor. The state department's Program Accountability Reporting (PAR) unit annually assesses the program. The most recent assessment for 2005 has not yet been completed; however, according to a PAR representative, the report discloses no findings or recommendations. The assessment completed in 2004 also disclosed no findings or recommendations for the program.

Family Services Counseling. Upper Cumberland CSA's Family Services Counseling program was designed as a case management program in an effort to help individuals and families become financially independent of welfare. The program receives referrals from the Families First case managers and helps identify barriers that may exist for individuals or families such as substance abuse, domestic violence, and behavioral problems. The program provides short-term case management and helps individuals overcome barriers in order to be compliant with the work plan set forth by Families First. The Department of Human Services (DHS) is responsible for overseeing the program. The program provides the department with monthly reports that contain statistical information such as the number of referrals received, number of cases closed, and the number of assessments completed. The reports provide the department a breakdown of program activity by county. In addition to statistical information, the department also requests that the program counselors obtain anecdotal success stories from program participants detailing how the program helped them successfully overcome a difficulty or barrier in their life. The Program Accountability Reporting unit (PAR) of DHS annually reviews the program. The most recent assessment completed for fiscal year 2005 disclosed a finding for a travel claim being paid at an incorrect mileage rate.

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## FINDINGS AND RECOMMENDATIONS

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### 1. Board members are not filing annual conflict-of-interest statements

#### Finding

Board policy for all three CSAs states,

If any matter before the Governing Board involves a project, transaction or relationship in which: a) a Board member personally; or, b) a Board member's associated institution, business, or board; or, c) a Board member's family members; or, d) where there may be a reasonable expectation that circumstances might construe the appearance of a direct or conflicting interest with such a project, transaction or relationship, the member shall then make known that interest in the Board immediately when such interest is recognized. The board member will be prohibited from engaging in any discussion, vote, or other action relative to any matter where such direct or conflicting interest exists and is disclosed.

However, there is no policy requiring annually signed conflict-of-interest statements, and such forms are not being signed on a yearly basis. At Mid-Cumberland CSA, of the 12 board members serving in fiscal years 2003 through 2005, three have not signed statements and two others have not signed one since 2001. The Mid-Cumberland CSA board's representative for the Commissioner of the Department of Children's Services (DCS) signed a conflict-of-interest statement in 2001 but did not declare the position's inherent conflict. At Upper Cumberland CSA, of the 21 board members serving in fiscal years 2003 through 2005, only 11 have signed conflict-of-interest statements, and those were dated April 2003. At South Central CSA, of the 11 board members (excluding the commissioner's representative) serving in fiscal years 2003 through 2005, four did not have a signed statement. Regarding the commissioner or commissioner's representative as a voting member of the board, see Observations and Comments on page 13.

Conflict-of-interest disclosures are designed to ensure that the public's interest is protected, and the current Governor's administration has made this a priority. Governor Bredesen's Executive Order No. 3 states that persons should avoid any action, whether or not specifically prohibited by statute or regulation, "which might result in or create the appearance of: (1) using public office for private gain; (2) giving preferential treatment to any person; (3) impeding government efficiency or economy; (4) losing complete independence or impartiality; (5) making a government decision outside of official channels; or (6) adversely affecting the confidence of the public in the integrity of the government."

Annual written disclosures of financial interests, prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions help ensure the board is acting on the state's behalf and that board members recuse themselves from decision-making when conflicts arise.

### **Recommendation**

The boards for Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA should revise their conflict-of-interest policies to require annually signed conflict-of-interest statements that list financial interests, prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions.

The three executive directors should ensure that comprehensive conflict-of-interest statements are received from board members in a timely manner, and board chairs should ensure that members recuse themselves as warranted.

### **Managements' Comments**

#### Mid-Cumberland CSA

We concur in part. MCCA has developed an Administrative Directive that requires employees to sign a conflict-of-interest statement annually; however, the board's policy does not address the frequency with which the conflict-of-interest statement should be signed. Although the board's policy does not require annual signing of the conflict-of-interest statement, board members are asked to sign a statement every year during the annual board of directors' Retreat held in July. The staff will continue to make every effort to obtain a signed conflict-of-interest statement from each board member annually. In addition, staff will recommend to the board a revision to its policies to add that the conflict-of-interest statement be signed annually by all board members.

#### Upper Cumberland CSA

We concur. Although the agency had a policy that stipulated that Board members make known any conflict-of-interest, we did not require annual signatures on a statement. We will follow the Comptroller's recommendations to require Board members to sign conflict-of-interest statements annually. We have already implemented this requirement and have received signed statements back from all members except two. We will follow up with them to ensure they received their disclosure form and ask them to sign and return as soon as possible.

We understand that board members should avoid any action which might result in or create the appearance of utilizing their position for gain, giving preferential treatment, impeding government efficiency, losing impartiality, making decisions outside of official channels or adversely affecting the confidence of the public in the integrity of government. We believe that

a procedure requiring them to annually sign disclosures of conflicts-of-interest will assist in reminding Board members of their obligations to disclose any conflicts and will be both valuable and feasible.

### South Central CSA

We concur. All board members have signed their statements as of June 2005. Annual updates will be conducted by our Administrative Services Director by each June 30<sup>th</sup> of the current calendar year or prior to when new appointees sit in on their first Board meeting.

The Policy Committee for the Community Services Agencies of Tennessee has revised their policies and has submitted the revisions to the Commissioner of the Department of Finance and Administration (F&A) for approval. Once approved, the South Central CSA Management Team will submit the policies to the Board for approval. In the future, the Board Chair will ensure that whenever a vote is called that may involve any Board members who have or may have a conflict-of-interest due to financial interests, prior employment, employment of immediate family members and other matters that may influence decisions or give the appearance of influencing decisions, be recused.

We understand and agree that Board members should avoid any action that might result in or create the appearance of utilizing their position for gain, giving preferential treatment, impeding government efficiency, losing impartiality, making decisions outside of official channels or adversely affecting the confidence of the public in the integrity of government.

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## **2. Board policies regarding vacancies, quorums, and member documentation should be adhered to and/or revised**

### **Finding**

Section 37-5-305(b), *Tennessee Code Annotated*, requires the membership of each board serving a rural CSA to be appointed by the Governor and to consist of a representative of each county within the agency boundary and the Commissioner of the Department of Finance and Administration (F&A) or the commissioner's designee. Officially, board positions may only be vacated by death, the Governor's removal of the holder, or a letter of resignation. However, when board members regularly fail to attend board meetings, the effectiveness of the board is adversely affected. In effect, chronic absences from board meetings are vacancies. A board member's complete failure to attend board meetings may only be considered a de facto vacancy and not an official vacancy.

Mid-Cumberland CSA serves Cheatham, Davidson, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, and Wilson counties. Upper Cumberland CSA serves Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, and White counties.

South Central CSA serves Bedford, Coffee, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, and Wayne counties.

At Mid-Cumberland CSA, statutory requirements result in a 13-member board. However, the positions representing Robertson, Stewart, and Williamson counties were vacant (Robertson, officially; Stewart and Williamson, de facto) through all of fiscal years 2003 through 2005 and are currently still vacant. Another two official vacancies (Humphreys and Sumner) occurred in June and September 2005, making a total of five effective vacancies as of October 2005. All but three of the current board members' terms have expired, necessitating reappointments or new appointments. According to the executive assistant, nomination forms were submitted to DCS, which acts as a liaison between the CSAs and the Governor's office. However, the only documentation of those nominations provided to auditors was undated and consisted of incomplete and unsigned nomination forms. The agency could not provide documentation showing completed nomination forms and transmittal to DCS or the Governor's office when requested. Also, of the ten directors serving in fiscal years 2003 through 2005 eligible to attend more than two meetings, six of the ten attended 50% or less of the roughly bi-monthly meetings. Poor attendance resulted in the lack of a quorum on three occasions during fiscal years 2003 through 2005. On these three occasions, the board conducted business, an action prohibited by policy that could have legal ramifications if challenged.

At Upper Cumberland CSA, statutory requirements result in a 15-member board. However, the positions representing Putnam, Overton, and Fentress counties were either de facto or officially vacant through most of fiscal years 2003 through 2005. Putnam County's position was still vacant as of October 2005. White County's position became officially vacant in September 2005. All but eight of the current members' terms have expired, necessitating reappointments or new appointments. According to the executive director, the agency submitted nomination forms to DCS, which acted as a liaison between the CSAs and the Governor's office. The nominee application forms provided to auditors were electronic documents completed by the executive director, who also typed in the nominees' signature and dates between July and October 2004. Some applications were missing information such as social security number and education, or questions were not answered, such as whether one was a U.S. citizen and had ever been convicted of a felony. The executive director could provide neither complete nominee-signed and dated nomination forms (whose accuracy would be attested to by the nominee's signature) nor dated agency memoranda showing when nominations were submitted to DCS or the Governor's office. However, the executive director stated that nominations have been made for both expired and vacant positions. Also, of the 18 directors serving in fiscal years 2003 through 2005 eligible to attend more than two meetings, 3 of the 18 attended 50% or less of meetings. Absenteeism has resulted in the lack of a quorum on 3 of 15 occasions between fiscal year 2003 and fiscal year 2005. On these three occasions, the board conducted business, an action prohibited by policy that could have legal ramifications if challenged.

At South Central CSA, statutory requirements result in a 13-member board. However, as of October 2005, there were six de facto vacancies—the positions representing Bedford, Giles, Hickman, Lewis, Perry, and Wayne counties. Hickman County's position has been vacant since 2000. Bedford, Giles, Perry, and Wayne counties' positions have been vacant since fall 2004. Lewis County's position was just recently vacated. All of the current board members' terms

have expired, necessitating reappointments or new appointments. According to the executive director, the agency did not maintain documentation of notices of vacancies to DCS and F&A, which act as a liaison between the CSAs and the Governor's office, and actual nominations submitted. However, the executive director states that at least one name has been submitted for each vacancy. Also, of the 12 directors (including the commissioner's representative) serving in fiscal years 2003 through 2005 eligible to attend more than two meetings, 5 of the 12 attended 50% or less of meetings.

While all three CSAs' board policies provide for board member participation via telephone, there is no provision for the removal of a board member because of absence or failure to perform the duties of the office. Such a policy would give the boards more options for replacing non-contributing board members in a more timely fashion.

South Central CSA also does not maintain files on any of its board members with information such as biographical data, appointment letters, resignation letters, and conflict-of-interest statements. Without such information, the agency cannot efficiently and effectively maintain and manage a fully functioning board that meets statutory and board requirements.

### **Recommendation**

The boards for Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA should design and implement a written policy defining how many consecutive absences may occur before they constitute excessive absences. Written policy should also require the board chair to notify the Department of Finance and Administration and the Governor in writing and in a timely manner of board members with excessive or consecutive absences. The board should work with the Governor's Office to ensure that the Governor has sufficient notice of upcoming vacancies and any other additional information he might need to make timely appointments.

The board chairs and executive directors of all three CSAs should ensure that they counsel their board members regarding the requirements for vacating a board position. When a board chair notes that a board member has not attended for some time, he or she should direct the executive director to contact that member, ascertain whether the member has any intention of regularly attending board meetings, and assist the board member in drafting a letter of resignation if necessary in a timely manner.

The boards for Mid-Cumberland CSA and Upper Cumberland CSA should also ensure that policy is followed and a quorum is present before any business is conducted.

South Central CSA should maintain documentation on board members detailing biographical information, appointments and resignations, and annually signed conflict-of-interest statements, etc.

The General Assembly may wish to consider amending state law to provide for the removal of board members with excessive or consecutive absences.

## Managements' Comments

### Mid-Cumberland CSA

We concur in part. The MCCA board chair and executive director have made every effort to counsel board members on the need to vacate a board position if they are unable to fulfill the duties of the position. When a board member has missed more than three consecutive bi-monthly meetings, the board chair has instructed the executive director to notify the board member in writing of the frequent absentees and the procedure for resigning from the board if it is their desire to resign. In two instances, the staff actually assisted board members in drafting a letter of resignation to submit to the Governor.

However, we concur, the board should design and implement a written policy defining how many consecutive absences may occur and what action should be taken. Such a policy has been drafted by a committee of executive directors and is currently under review by the legal staff of the Department of Finance and Administration. Once the review has been completed the policy will go to the MCCA board of directors for review and approval. The draft policy states: "In the event that any member fails to be in attendance at a majority of the regularly scheduled board meetings within any given twelve month period or three (3) of any four (4) consecutive meetings, the Board will notify the Governor and the Commissioner of F&A of the member's failure to attend and may also recommend that the appointed position be declared vacant due to the member's lack of participation."

### Upper Cumberland CSA

We concur in part. The Executive Director followed DCS protocol in submitting e-mail versions of the applicants for Board positions. These were submitted electronically to DCS, along with résumés for the Board positions where we had them at the time of submittal. Potential applicants for Board positions were telephoned to determine their interest and to obtain necessary information about the candidate. Following the e-mail version, the UCCA Director of Administrative Services sent the hard-copy packet of information on twenty-two nominees to DCS. Our records indicate that the forms were sent. We are uncertain if the auditors reviewed the hard copy files that were submitted to DCS.

The agency's Board policies did not address Board member vacancies since Board appointments are the responsibility of the Governor's office. Revised governance policies, currently being reviewed by the Department of Finance and Administration, have been written to state that the CSA Board will notify the Governor's office when members fail to fulfill their obligations as Board members with the understanding that any action taken to remove a Board member will be at the sole discretion of the Governor.

In the instances where a quorum was questioned by auditors, the agency interpreted that vacant positions would not count toward the percentage required for a quorum. However, we understand that the auditor's interpretation is that a position is considered filled until a position is re-appointed or replaced and this should have been considered when calculating a quorum. In all instances cited, at least six Board members were present. We will ask for official clarification

from the Department of Finance and Administration as to what constitutes Board membership for the purposes of establishing a quorum.

We understand that Board members should take an active role in the governance of the agency through regular attendance at meetings and believe that a policy outlining the process for notifying the Governor of a member's inability to fulfill their obligations through regular attendance is both valuable and feasible and could assist the agency in ensuring that there are always enough members present for a quorum and to conduct the business of the agency.

We are of the opinion that, should the General Assembly choose to accept and act upon this recommendation, that is within their scope of authority and we will abide by any laws so enacted. Active Board participation is critical to the success of the agency and we will support any recommendations set forth by the General Assembly or Governor in this regard.

### South Central CSA

We concur in part. Section 37-5-305, *Tennessee Code Annotated*, clearly states that the Governor appoints members to the South Central CSA Board. The Agency's policies for its Board did not address Board member vacancies. For the first time in the history of the CSAs, the Governor's office has requested the assistance of the Board and staff of the CSA in filling Board appointments. The Governor's office has requested that at least three people be nominated from each county the South Central CSA serves, even if the current member is eligible and willing to serve another term. The Board Chair and SCCSA's Management Team have made every effort to train Board members on the need to vacate a position if they are unable to fulfill the duties of their position.

Future policies will state that the South Central CSA Board Chair will notify the Governor's office when members fail to fulfill their obligation as a Board member. The Administrative Services Director will notify F&A of any vacancies that still exist.

One member has since been appointed by the Governor, but the Department of Children's Services did not notify SCCSA of the appointment until November 2005.

As of November 2005, South Central CSA has created files on all active Board members. The Administrative Services Director will review the files annually (by June of each calendar year) for each Board member to determine if all documentation is present or current.

We understand that Board members should take an active role in the governance of the agency through regular attendance at meetings and believe that a policy outlining the process for notifying the Governor of a member's inability to fulfill their obligations through regular attendance is both valuable and feasible.

We believe that, should the General Assembly choose to accept and act upon this recommendation, we will abide by any laws so enacted. Active Board participation is critical to the success of the South Central CSA and we will support any recommendations set forth by the General Assembly or Governor in this regard.

**3. South Central CSA should ensure that it has effective policies and procedures for monitoring its vendors for compliance with Title VI**

**Finding**

South Central CSA does not have formal policies and procedures in place for monitoring vendors for compliance with Title VI of the Civil Rights Act of 1964. However, since all of South Central's contracts were for its Department of Children's Services (DCS) programs, DCS's decision to provide Child and Family Services programs for the South Central region in-house effective September 1, 2005, terminated all of South Central's existing contracts. In the future, though, the new programs for housing assistance for Hurricane Katrina evacuees and case management for the Division of Mental Retardation Services may result in the agency entering into contracts for services. (See page 15 regarding these new programs.)

Without effective monitoring policies and procedures, South Central CSA cannot ensure that it and its contractors are in compliance with Title VI.

**Recommendation**

South Central CSA should develop formal, written Title VI policies and procedures for monitoring itself and the vendors with whom it does business for compliance with Title VI.

**Management's Comment**

We concur. Although our current Personnel Policies have language surrounding Title VI, we agree more detailed policies and procedures are needed. The Community Services Agencies Personnel Standards Committee has recently developed and submitted to the Department of Finance & Administration a more specific policy that will meet the requirements outlined in the audit recommendations. As soon as this policy is approved by the Department of Finance & Administration, it will be presented to the SCCSA Board of Directors for approval. When approved, all staff, vendors, and clients will be trained on the issues related to this new policy. Additionally, as part of the contract monitoring function, we will monitor all vendors for Title VI compliance.

#### **4. TennCare Transportation program vendor files do not contain necessary documentation as required by contract and internal policy**

##### **Finding**

Through contracts with Managed Care Organizations and Behavioral Health Organizations (MCOs and BHOs), the Middle Tennessee CSAs—Mid-Cumberland, Upper Cumberland, and South Central—offer administrative services for a program designed to provide non-emergency transportation services for eligible TennCare recipients to and from health-related services. The agencies are responsible for organizing and maintaining a network of conventional automobile and ambulance service vendors that can provide the needed transportation service in their designated area. The agencies facilitate and schedule transportation for eligible TennCare enrollees for various medical appointments the enrollees may have.

In accordance with the TennCare Transportation program contract and internal policy, the agencies are responsible for maintaining documentation for each vendor used in the program. The files for the transportation vendors were reviewed at each agency to determine if the following documentation was present:

- an annual certification form;
- comprehensive background checks for all drivers, including the individual's driving and criminal record;
- copies of valid and current drivers' licenses with the appropriate commercial endorsements;
- evidence of both a performance evaluation and pre-service/in-service training for each driver;
- a valid state business license or ambulance service license; and
- a copy of a current certificate of liability insurance.

##### Mid-Cumberland CSA

Mid-Cumberland CSA maintains a network of 17 conventional vendors and 17 ambulatory vendors. Of the nine conventional vendors reviewed:

- one of nine conventional vendors had drivers with incomplete background checks (driving record only, no criminal),
- one of nine conventional vendors had drivers with no performance evaluation, and
- one of nine conventional vendors had an expired business license.

Of the eight ambulatory vendors reviewed:

- one of eight ambulatory vendors had an expired business license.

### Upper Cumberland CSA

Upper Cumberland CSA maintains a network of 8 conventional vendors and 22 ambulatory vendors. Of the eight conventional vendors reviewed:

- four of eight conventional vendors had expired business licenses,
- three of eight conventional vendors had some drivers without criminal and/or driving background checks,
- one of eight conventional vendors had an expired insurance policy, and
- three of eight conventional vendors had some drivers with an expired license.

Of the 22 ambulatory vendors reviewed:

- 2 of 22 ambulatory vendors had expired EMS licenses.

### South Central CSA

South Central CSA maintains a network of 18 conventional vendors and 13 ambulatory vendors. Of the nine conventional vendors reviewed:

- seven of nine conventional vendors did not have valid business licenses,
- eight of nine conventional vendors had drivers with incomplete background checks (driving record only, no criminal),
- one of nine conventional vendors had drivers with no performance evaluation, and
- three of nine conventional vendors had drivers with no record of training.

Of the seven ambulatory vendors reviewed, we found no problems.

The maintenance and verification of documentation such as performance evaluations and full motor vehicle and criminal background checks for all transportation drivers is crucial to maintaining the safety and quality of the service received by the TennCare recipients of all ages who choose to use the program. The CSAs must take every action available to ensure that transportation vendors comply with contract requirements and immediately suspend any services for a vendor who is not in compliance.

## **Recommendation**

Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA should obtain, and keep updated, all necessary documentation from transportation vendors to ensure vendors are able to safely meet the needs of the TennCare population. When CSA staff determine that a vendor is not in compliance with contract requirements, they should take appropriate action as outlined in the contract, including the immediate suspension of the vendor if necessary.

## **Managements' Comments**

### Mid-Cumberland CSA

We concur in part. One (1) vendor's file did not contain a criminal background check. The vendor in question is under contract with BlueCare/TennCare Select and their policy does not specifically state that a criminal background check is required. During previous audits and vendor meetings, BlueCare/TennCare Select has stated they will accept either a Motor Vehicle Report (MVR) or a criminal background check.

Since the transportation vendors are not under contract with MCCSA, we will ask BlueCare/TennCare Select to amend the vendor contracts to give more clarity on background checks.

### **Auditor Note to Mid-Cumberland CSA comment:**

According to the CSA TennCare Transportation Guidelines required and approved by BlueCross,

the Transporter is responsible for assuring that each and every vehicle operator (driver) and attendant to be employed in the conduct of contract TennCare transportation services has no clearly discernible record of either:

- a. any major vehicle moving violations, such as reckless driving, driving while intoxicated (DWI)/driving under the influence (DUI), etc.
- b. any felony criminal charge

Unless other provisions are allowable under the Transporter's contract terms, it is required that the Transporter shall conduct, or obtain, a current Driver's Record Verification (DRV) and a law enforcement background investigation report on all applicable Transporter employees.

However, there is some inconsistency in BlueCross contracts. Some contracts between BlueCross and transportation vendors require that "each vehicle operator shall be subjected to a Driver's Record Verification (DRV) **and/or** appropriate law enforcement background investigation disclosing no discernible conviction of any felony criminal charge or major motor vehicle moving violation within the immediate past five (5) years prior to employment"

[emphasis added]. Other contracts specify that both a DRV **and** law enforcement background investigation must be performed disclosing no discernible felony criminal conviction or major motor vehicle moving violation. Unless a vendor conducts a criminal background check, the second requirement of discerning any felony criminal charge cannot be met.

#### Upper Cumberland CSA

We concur. The agency has historically scored very high on contract compliance on all audits conducted by the MCO and BHO for contract compliance. The agency will review our system of records management to ensure that all necessary documentation is obtained and kept current in the vendor files. Although we strive for perfection, we realize there are times when dealing with hundreds of drivers for multiple vendors there may be instances where a piece of paper does not get filed or gets misplaced.

#### South Central CSA

We concur in part. The South Central CSA TennCare Transportation Program Director monitors vendor files monthly. The South Central CSA has historically scored very high on contract compliance on all audits conducted by the MCO and BHO. South Central CSA will immediately review its current system of records keeping to ensure that all necessary documentation is obtained and kept current in the vendor files. If a vendor does not comply with their contract with either the MCO and/or BHO, the Agency will report to the MCO and BHO the nature of the noncompliance and will request further instructions for follow-up to a corrective plan.

The agency strives hard to fulfill all its contractual obligations, realizing that at times there will be instances where every transportation vendor file might lack a specific piece of paper. We believe it is valuable and feasible to attempt to always ensure these records are up to date and will strive to do so.

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### **5. Upper Cumberland CSA's Family Services Counseling program personnel files do not contain documentation required by contract, agency policy, and best practices**

#### **Finding**

Through a contract with the Department of Human Services (DHS), the Family Services Counseling program at Upper Cumberland CSA offers case management and counseling to Families First participants in order to help them comply with their Families First work plan and become financially independent of welfare.

The agency's contract with DHS requires that all program counselors have a master's degree and at least one year of field experience. Upper Cumberland CSA policies state that complete background checks may be conducted on applicants and employees, and employees will not enter into any relationship with any party involved directly or indirectly in CSA business

in such a way that conflict could arise between the employee's interests and the duties or policies of the CSA.

The personnel files for all eight Family Services Counseling program staff were reviewed for documentation of verification of education (master's degree required for program counselors); at least one year of field experience for program counselors; complete background check; documentation of training; and a signed annual conflict-of-interest statement. Of the eight personnel files reviewed, we found the following:

- eight of eight files did not contain a current signed conflict-of-interest statement,
- one of eight files did not contain a background check, and
- one of eight files did not contain documentation of an earned master's degree.

Upper Cumberland CSA and Family Services Counseling program policies do not require staff members to complete annual conflict-of-interest statements; a statement is signed at the commencement of employment with the program in which the employee simply acknowledges that he or she has read and understands the conflict-of-interest policy. The signed form does not require the employee to declare in writing the existence of a potential conflict. In addition, the policy does not address how staff should report conflicts that arise during their employment.

Conflict-of-interest statements are designed to identify circumstances that are conflicts of interest or could create the appearance of impropriety. Because the program uses outside programs and vendors for individuals that need specialized services, an annually signed conflict-of-interest statement is imperative to ensure that no action or decision would be viewed as preferential treatment or one that could result in private or personal gain for Upper Cumberland CSA staff. The statements should also be updated when circumstances change.

A complete background check is a vital piece of information that should be received prior to the commencement of an individual's employment. Due to the potentially vulnerable state of many of the program's participants and the counselors' close proximity to children, it is crucial that the agency use the highest level of caution available before employing anyone in the program.

### **Recommendation**

Upper Cumberland CSA should revise its conflict-of-interest policy to require annually signed conflict-of-interest statements that list financial interests, prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions. The program director should ensure that program staff sign comprehensive conflict-of-interest statements in a timely manner and that any staff member declaring a conflict of interest be removed from any situation or decision as warranted by the circumstance. The policy should also address the method to report conflicts that arise between annual disclosures such as requiring staff to update the forms when circumstances change and at least annually.

Upper Cumberland CSA should maintain personnel documentation required by contract as well as by internal policy. Employees should have a complete background check as well as verification of education and experience conducted prior to the commencement of employment.

### **Management's Comment**

We concur in part. The agency's policy, which has been acceptable to Comptroller auditors and DHS auditors in the past, required that all employees acknowledge receipt and understanding of the conflict of interest policy and all employees signed when they were first employed. The agency's policy did not require annual conflict of interest statements to be signed so the agency was in compliance with our policy. It is our understanding, however, that the Comptroller's auditors have determined best practice policy requires employees to sign statements annually. The auditors shared a sample copy of an acceptable conflict of interest disclosure form currently being used by their agency as a sample. We will require all employees to sign a similar statement annually and have already begun that process.

One employee file did not contain a background check. Although state law only requires fingerprint background checks on persons working with children (this program works with adults), the agency implemented a system of fingerprinting for all its employees in 2003-2004. This employee was fingerprinted in December 2003 but the results were not located in the file at the time of the audit. We have since obtained a copy of the results of the fingerprint check that occurred in 2003 and they are in her file.

According to the audit report, one employee did not have verification of a Master's Degree in his file. The file did contain a copy of the employee's State Department of Education certification which listed his credentials as Master's Prepared. We have been reviewed several times by the Comptroller's office and Department of Human Services and this verification always sufficed for their purposes. We will, however, ask this employee to present additional proof of his Master's degree.

It is both valuable and feasible to require annual signed conflict of interest statements from staff. Likewise, we agree that appropriate background and verification of education checks on all employees are necessary components of carrying out our business in an accountable way.

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## RECOMMENDATIONS

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### LEGISLATIVE

This performance audit identified the following areas in which the General Assembly may wish to consider statutory changes to improve the efficiency and effectiveness of Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA's operations.

1. The General Assembly may wish to consider amending state law to provide for the removal of board members with excessive or consecutive absences.
2. The General Assembly may wish to consider amending Section 37-5-305(b), *Tennessee Code Annotated*, based upon the advice of the Attorney General, to remove the Commissioner of Finance and Administration or the commissioner's representative from serving as a voting member on rural CSA boards. Section 37-5-305(j), *Tennessee Code Annotated*, would limit the commissioner's participating in the majority of CSA business.

### ADMINISTRATIVE

Mid-Cumberland CSA should address the following areas to improve the efficiency and effectiveness of its operations.

1. The board should revise its conflict-of-interest policy to require annually signed conflict-of-interest statements that list financial interests, prior employment, employment of family members, and other matters that may influence decisions or could give the appearance of influencing decisions. The executive director should ensure that comprehensive conflict-of-interest statements are received from board members in a timely manner, and board chairs should ensure that their members recuse themselves as warranted.
2. The board should design and implement a written policy defining how many consecutive absences may occur before that constitutes excessive absences and that the board chair notify the Department of Finance and Administration and the Governor in writing and in a timely manner of board members with excessive or consecutive absences. The board should work with the Governor's Office to ensure that the Governor has sufficient notice of upcoming vacancies and any other additional information he might need to make timely appointments. The board chair and executive director should ensure that they counsel their board members regarding the requirements for vacating a board position. When a board chair notes that a board member has not attended for some time, he or she should direct the executive director to contact that member, ascertain whether the board member has any intention of regularly attending board meetings, and assist that board member in drafting a letter of resignation if necessary in a timely manner.

3. The board should ensure that policy is followed and a quorum is present before any business is conducted.
4. The TennCare Transportation program director should ensure that the program obtains, and keeps updated, all necessary documentation from TennCare transportation vendors to ensure vendors are able to safely meet the needs of the TennCare population. When it is determined that a vendor is not in compliance with contract requirements, the program director should take appropriate action as outlined in the contract, including the immediate suspension of the vendor if necessary.

Upper Cumberland CSA should address the following areas to improve the efficiency and effectiveness of its operations.

1. The board should revise its conflict-of-interest policy to require annually signed conflict-of-interest statements that list financial interests, prior employment, employment of family members, and other matters that may influence decisions or could give the appearance of influencing decisions. The executive director should ensure that comprehensive conflict-of-interest statements are received from board members in a timely manner, and board chairs should ensure that their members recuse themselves as warranted.
2. The board should design and implement a written policy defining how many consecutive absences may occur before that constitutes excessive absences and that the board chair notify the Department of Finance and Administration and the Governor in writing and in a timely manner of board members with excessive or consecutive absences. The board should work with the Governor's Office to ensure that the Governor has sufficient notice of upcoming vacancies and any other additional information he might need to make timely appointments. The board chair and executive director should ensure that they counsel their board members regarding the requirements for vacating a board position. When a board chair notes that a board member has not attended for some time, he or she should direct the executive director to contact that member, ascertain whether the board member has any intention of regularly attending board meetings, and assist that board member in drafting a letter of resignation if necessary in a timely manner.
3. The board should ensure that policy is followed and a quorum is present before any business is conducted.
4. The TennCare Transportation program director should ensure that the program obtains, and keeps updated, all necessary documentation from TennCare transportation vendors to ensure vendors are able to safely meet the needs of the TennCare population. When it is determined that a vendor is not in compliance with contract requirements, the program director should take appropriate action as outlined in the contract, including the immediate suspension of the vendor if necessary.
5. The executive director should revise the agency's conflict-of-interest policy to require annual signed conflict-of-interest statements that list financial interests, prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions. The Family Services Counseling program director should ensure that program staff sign

comprehensive conflict-of-interest statements in a timely manner and that any staff member declaring a conflict of interest be removed from any situation or decision as warranted by the circumstance. The policy should also address the method to report conflicts that arise between annual disclosures such as requiring staff to update the forms when circumstances change and at least annually.

6. The executive director should maintain personnel documentation required by contract as well as by internal policy. Employees should have a complete background check as well as verification of education and experience conducted prior to the commencement of employment.

South Central CSA should address the following areas to improve the efficiency and effectiveness of its operations.

1. The board should revise its conflict-of-interest policy to require annually signed conflict-of-interest statements that list financial interests, prior employment, employment of family members, and other matters that may influence decisions or could give the appearance of influencing decisions. The executive director should ensure that comprehensive conflict-of-interest statements are received from board members in a timely manner, and board chairs should ensure that their members recuse themselves as warranted.
2. The board should design and implement a written policy defining how many consecutive absences may occur before that constitutes excessive absences and that the board chair notify the Department of Finance and Administration and the Governor in writing and in a timely manner of board members with excessive or consecutive absences. The board should work with the Governor's Office to ensure that the Governor has sufficient notice of upcoming vacancies and any other additional information he might need to make timely appointments. The board chair and executive director should ensure that they counsel their board members regarding the requirements for vacating a board position. When a board chair notes that a board member has not attended for some time, he or she should direct the executive director to contact that member, ascertain whether the board member has any intention of regularly attending board meetings, and assist that board member in drafting a letter of resignation if necessary in a timely manner.
3. The executive director should maintain documentation on past and present board members detailing biographical information, appointments and resignations, annually signed conflict-of-interest statements, etc.
4. The executive director should develop formal, written Title VI policies and procedures for monitoring the agency and the vendors with whom it does business for compliance with Title VI.
5. The TennCare Transportation program director should ensure that the program obtains, and keeps updated, all necessary documentation from TennCare transportation vendors to ensure vendors are able to safely meet the needs of the TennCare population. When it is determined that a vendor is not in compliance with contract requirements, the program director should take appropriate action as outlined in the contract, including the immediate suspension of the vendor if necessary.

The Department of Finance and Administration (F&A) should address the following areas to improve the efficiency and effectiveness of its operations.

1. The Commissioner of F&A should require his representatives to recuse themselves from CSA board votes. The Commissioner of F&A and the CSAs should seek the advice of the Attorney General regarding the commissioner's role on the board of directors.
2. The department should determine what information it needs in a CSA annual report and when. The department should revise Rule 0250-7-6-.05(8) to reflect F&A requirements in its grant contract with the CSAs. F&A should also ensure that there is in place a monitoring tool that its liaison with the CSAs will use to determine whether CSAs submit reports in a timely manner.

## **APPENDIX**

### **Title VI Information**

All programs or activities receiving federal financial assistance are prohibited by Title VI of the Civil Rights Act of 1964 from discriminating against participants or clients on the basis of race, color, or national origin. Mid-Cumberland CSA, Upper Cumberland CSA, and South Central CSA all receive, have received until recently, or are just beginning to receive federal funds from the Department of Children's Services (DCS) for the Child and Family Services programs; from TennCare via BlueCross and Magellan for transportation services; and from the Department of Finance and Administration's Office of Criminal Justice Programs for the new Interim Sheltering Program and Division of Mental Retardation Services for case management services. In addition, Mid-Cumberland CSA receives federal funds through the Department of Labor and Workforce Development for the Senior Community Service Employment Program, and Upper Cumberland CSA receives federal funds through the Department of Human Services (DHS) for the Family Services Counseling program.

These CSAs have designated Title VI coordinators and have reported up to now to either DCS or DHS through Title VI surveys of these departments' vendors. Only Upper Cumberland CSA states that it monitors vendors for Title VI compliance through annual site visits. These three CSAs state they have received no Title VI complaints during the past two years.

See also Finding 3 regarding South Central CSA Title VI monitoring.

**Mid-Cumberland CSA Staff Ethnicity and Gender  
By Job Position  
November 2005**

Title	Gender		Ethnicity			
	Male	Female	White	Black	Other	Unknown*
Administrative Assistant	0	4	2	2	0	0
Administrative Technician	0	1	1	0	0	0
Assistant Field Systems Administrator	0	1	1	0	0	0
Billing Technician	0	2	0	2	0	0
Billing Technician/Relief & Recovery Prog.	0	2	2	0	0	0
Clinical Team Leader	0	1	1	0	0	0
Director, Administrative Services	0	1	1	0	0	0
Director, Child & Family Services	0	1	0	1	0	0
Director, Special Programs	0	1	0	1	0	0
Diversion Specialist	1	3	1	0	2	1
Education Coordinator	0	1	0	1	0	0
Employment Specialist	0	1	1	0	0	0
Executive Assistant	0	1	0	1	0	0
Executive Director	0	1	0	1	0	0
Flex Funding for Families Billing Technician	0	1	1	0	0	0
Flex Funding for Families Coordinator	0	1	1	0	0	0
Family Support Services Billing Technician	0	1	0	1	0	0
Family Support Services/Family Crisis Intervention Program Case Manager	5	30	12	19	0	4
Field Systems Administrator	0	1	1	0	0	0
Human Resource/Payroll Technician	0	1	0	0	1	0
Information Technology Manager	1	0	1	0	0	0
Independent Support Coordinator	1	0	0	1	0	0
Lead Accountant	1	0	1	0	0	0
Lead Independent Support Coordinator	0	1	0	1	0	0
Non-Custodial Services Supervisor	3	4	5	1	0	1
Office Assistant	0	2	2	0	0	0
Office Manager	0	2	0	0	2	0
Performance Reviewer	0	2	1	1	0	0
Program Coordinator	0	2	0	2	0	0
Purchasing Services Coordinator	0	1	1	0	0	0
Receptionist	0	2	1	1	0	0
Relief & Recovery Supervisor	0	2	0	2	0	0
SCSEP Coordinator	1	0	1	0	0	0
Statistical Analyst	1	0	1	0	0	0
Support Coordination Specialist	4	14	4	10	1	3
Transitioning Youth Resources Program Case Manager	0	1	0	1	0	0
TennCare Transportation Coordinator	0	1	0	1	0	0
Temporary Education Specialist	1	0	1	0	0	0
Transportation Specialist	0	8	0	8	0	0
<b>Total</b>	19	98	44	58	6	9

\* New hires who haven't started yet.

**Mid-Cumberland CSA Board Members Ethnicity and Gender  
October 2005**

	Gender		Ethnicity	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Board Members	0	7	5	2
(5 vacancies)				

**Upper Cumberland CSA Staff Ethnicity and Gender  
By Job Position  
October 2005**

Title	Gender		Ethnicity	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Executive Director	0	1	1	0
Director of Fiscal Services	0	1	1	0
Administrative Specialist 3	0	5	5	0
Administrative Specialist 2	0	2	2	0
Administrative Specialist 1	0	1	1	0
Program Specialist 5	0	2	2	0
Program Specialist 4	4	4	8	0
Program Specialist 3	0	1	1	0
Program Specialist 2	2	1	3	0
Program Coordinator	1	1	2	0
<b>Total</b>	<b>7</b>	<b>19</b>	<b>26</b>	<b>0</b>

**Upper Cumberland CSA Board Members Ethnicity and Gender  
October 2005**

	Gender		Ethnicity	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Board Members	3	9	12	0
(2 vacancies)				

**South Central CSA Staff Ethnicity and Gender  
By Job Position  
October 2005**

<b>Title</b>	<b>Gender</b>		<b>Ethnicity</b>	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Administrative Specialist	0	7	4	3
Case Manager	4	3	6	1
Director, Administrative Services	0	1	1	0
Executive Director	1	0	1	0
Fiscal Specialist	0	1	1	0
TennCare Transportation Coordinator	0	1	1	0
<b>Total</b>	<b>5</b>	<b>13</b>	<b>14</b>	<b>4</b>

**South Central CSA Board Members Ethnicity and Gender  
October 2005**

	<b>Gender</b>		<b>Ethnicity</b>	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Board Members	1	5	6	0
(6 vacancies)				