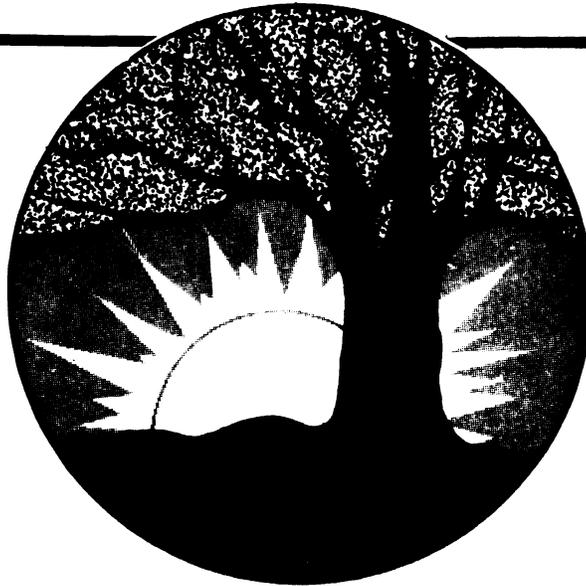


PERFORMANCE AUDIT

Human Resource Agencies
October 2007



John G. Morgan
Comptroller of the Treasury



State of Tennessee
Comptroller of the Treasury
Department of Audit
Division of State Audit

Arthur A. Hayes, Jr., CPA, JD, CFE
Director

Deborah V. Loveless, CPA
Assistant Director

Dena Winningham, CGFM
Audit Manager

Catherine B. Balthrop, CPA
In-Charge Auditor

Kristy Carroll, CFE
Nichole Curtiss, CFE
Stacey G. Harden, JD
Halmat Qazi
Wesley M. Suddarth
Staff Auditors

Amy Brack
Editor

Comptroller of the Treasury, Division of State Audit
1500 James K. Polk Building, Nashville, TN 37243-0264
(615) 401-7897

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STATE OF TENNESSEE
COMPTROLLER OF THE TREASURY

State Capitol
Nashville, Tennessee 37243-0260
(615) 741-2501

John G. Morgan
Comptroller

October 1, 2007

The Honorable Ron Ramsey
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 Human Resource Agencies. 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 the agencies should be continued, restructured, or terminated.

Sincerely,

John G. Morgan
Comptroller of the Treasury

JGM/dww
06-080

State of Tennessee

Audit Highlights

Comptroller of the Treasury

Division of State Audit

Performance Audit Human Resource Agencies October 2007

AUDIT OBJECTIVES

The objectives of the audit were to review human resource agency programs, review board membership and meeting proceedings, determine the program oversight conducted by contracting agencies, review the agencies' conflict-of-interest policy, and examine Title VI oversight and compliance.

FINDINGS

South Central Tennessee Human Resource Agency's Head Start Program Files Did Not Contain Required Enrollee Documents

A computer database indicated the agency had the required documentation, but it was not in the children's files. The Head Start program requires health screenings, immunization records, and home visits for each child prior to enrollment. Inadequate documentation of children's records could have a number of negative effects, including children not receiving needed services to prepare them for school and the potential loss of federal funding for being out of compliance with Head Start regulations (page 45).

Several Agencies Did Not Offer Hepatitis B Vaccines to Their Van Drivers or Did Not Document the Offers, in Violation of Federal Occupational Safety and Health Administration (OSHA) Regulations

Some employee files in four human resource agencies did not contain documentation of an offer of a Hepatitis B vaccine. OSHA requires such offers because drivers have exposure to infectious diseases, including hepatitis B (page 49).

Several Human Resource Agencies Need to Improve Their Current Conflict-of-Interest Policy and Procedures for Board Members

Several agencies need to develop a formal, written policy for potential conflicts of interest by board members. Agencies that have policies need to ensure that board

members submit annual conflict-of-interest disclosures. Without a means of identifying potential conflicts and discussing and resolving them before they have an impact on decisions, board members could be subject to questions concerning impartiality and independence (page 52).

Two Van Drivers Did Not Have Pre-employment Background Checks, and Another Did Not Have a Pre-employment Drug Screen

To ensure the safety of van passengers, human resource agencies are required to conduct background checks and drug screens. Two van drivers did not have the

required criminal background check, and another driver did not have a pre-employment drug screen (page 56).

Some Agencies Did Not Ensure That Van Drivers Received Proper Training From the Tennessee Transit Center

In two agencies, some driver files did not contain documentation of training courses. The training includes instruction on conflict avoidance, passenger assistance, use of radios, and transporting clients in wheelchairs. Annual training helps ensure that drivers perform their duties as safely as possible (page 59).

OBSERVATIONS AND COMMENTS

The audit also discusses the following issues: Mid-Cumberland Human Resource Agency's implementation of the Department of Transportation Management System, the lack of specific eligibility and attendance guidelines for transportation programs in Families First and Job Access, waiting lists for the Senior Nutrition Program, and the need for a uniform tracking system for transportation complaints (page 37).

Performance Audit Human Resource Agencies

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Performance Audit Human Resource Agencies

INTRODUCTION

PURPOSE AND AUTHORITY FOR THE AUDIT

This performance audit of nine human resource agencies was conducted pursuant to the Tennessee Governmental Entity Review Law, *Tennessee Code Annotated*, Title 4, Chapter 29. Under Section 4-29-229, the human resource agencies are scheduled to terminate June 30, 2008. The Comptroller of the Treasury is authorized under Section 4-29-111 to conduct a limited program review audit of the human resource 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 the human resource agencies should be continued, restructured, or terminated. The human resource agencies are

- Delta Human Resource Agency,
- East Tennessee Human Resource Agency,
- First Tennessee Human Resource Agency,
- Mid-Cumberland Human Resource Agency,
- Northwest Tennessee Human Resource Agency,
- South Central Tennessee Human Resource Agency,
- Southeast Tennessee Human Resource Agency,
- Southwest Tennessee Human Resource Agency, and
- Upper Cumberland Human Resource Agency.

OBJECTIVES OF THE AUDIT

The objectives of the audit were to

1. review human resource agency programs through interviews and file reviews,
2. review board membership and meeting proceedings,
3. determine the program oversight conducted by contracting agencies,
4. review the agencies' conflict-of-interest policy, and
5. examine Title VI oversight and compliance.

SCOPE AND METHODOLOGY OF THE AUDIT

The activities of the nine human resource agencies were reviewed for calendar years 2003 through 2006. 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. a review of applicable statutes and policies and procedures;
2. an examination of records, reports, files, and information summaries;
3. site visits to the nine agencies and interviews with staff;
4. a review of the prior performance audit and a review of financial audits by private accounting firms; and
5. interviews with agency staff and staff of state agencies that interact with the human resource agencies.

ORGANIZATION AND RESPONSIBILITIES

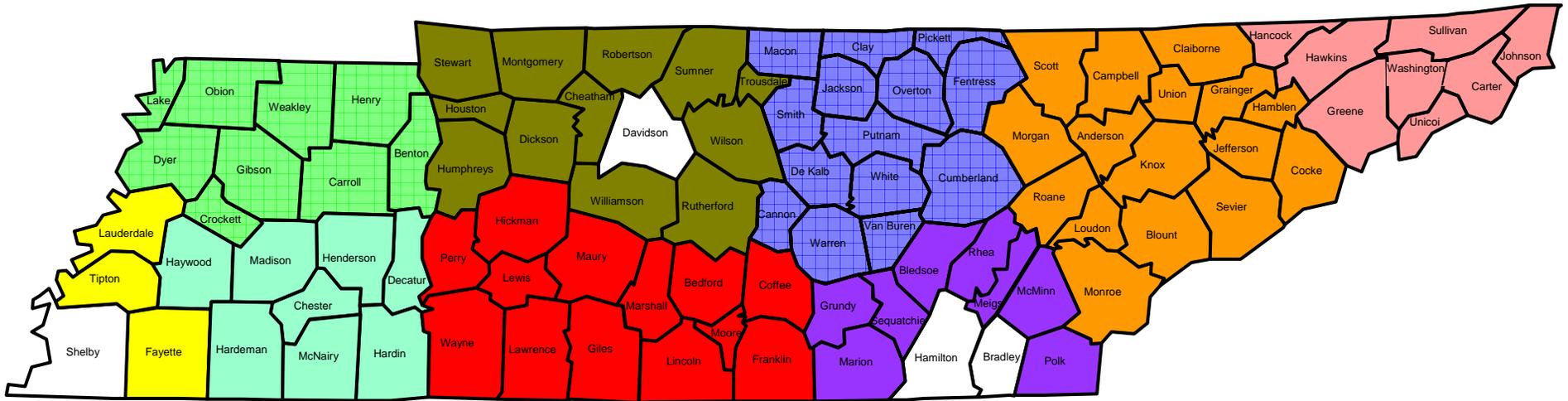
Tennessee's human resource agencies operate under the authority of Title 13, Chapter 26, of *Tennessee Code Annotated*. There are nine human resource agencies serving as the delivery system for services to 91 of the state's 95 counties. See the map on page 3 for the service areas of the HRAs. Each HRA has a different combination of programs for its service delivery area. Federal financial assistance accounts for the majority of program revenues. The major federal programs administered by the agencies include Transportation programs, Head Start, Low Income Home Energy Assistance, the Weatherization Assistance Program, Community Services Block Grants, Workforce Development, food programs, and aging programs. See Appendix 1 for a list of the 2006 programs, funding sources, and amounts by HRA.

BOARD MEMBERSHIP

Section 13-26-103, *Tennessee Code Annotated*, establishes the membership requirements for the governing boards of the human resource agencies. Board membership includes all county executives within the area served, the mayors of all municipalities, the chief executive officer of any metropolitan government within the area served, one representative from a local agency in each county, and one state senator and one representative whose districts lie within the human resource agency's jurisdiction. Section 13-26-103 also requires the governing board of each human resource agency to appoint a policy council to act on its behalf. The legislation stipulates that the members of the policy council are to be broadly based and equitably distributed between human resource service providers and consumers. The Human Resource Agency's Policy Council has the power to appoint individuals to senior staff positions, determine major policies, approve overall program plans and priorities, and assure compliance with proposals for financial assistance. Any actions of the policy council are subject to ratification by the governing board. During field work, we reviewed board membership and meeting minutes. We found that all nine

Exhibit 1

Human Resource Agency Service Areas April 2007



Agencies

- Delta Human Resource Agency
- East Tennessee Human Resource Agency
- First Tennessee Human Resource Agency
- Mid-Cumberland Human Resource Agency
- Northwest Tennessee Human Resource Agency
- South Central Tennessee Human Resource
- Southeast Tennessee Human Resource Agency
- Southwest Tennessee Human Resource
- Upper Cumberland Human Resource Agency

Source: Human Resource Agency Annual Reports

human resource agencies have boards that meet the statutory requirements and that their policy council actions are ratified by the governing board.

TENNESSEE ASSOCIATION OF HUMAN RESOURCE AGENCIES

The nine human resource agencies are members of the Tennessee Association of Human Resource Agencies (TAHRA). TAHRA's vision statement is "To create a society in which each person has a sense of self-worth and well being; accepts responsibility for self, family and community; and has the capacity to be productive and independent." TAHRA's mission is "to help people help themselves by providing knowledge and resources to improve the quality of life in the State of Tennessee." TAHRA meets periodically to discuss issues affecting the HRAs. Recently, TAHRA indicated that the federal budget includes cuts in some programs such as Weatherization Assistance and Community Services Block Grant. In addition to addressing funding issues, the association assists the members with planning, policies, and staff training. In its most recent report—for fiscal year 2006—TAHRA states that the total program dollars for all nine HRAs is approximately \$150 million with children and youth services (\$40 million), transportation (\$27 million), and elderly services (\$22 million), as the larger program categories.

Because the majority of program revenues for the agencies are federal, the president of TAHRA has expressed concern about the current and proposed level of funding for agency programs in the federal budget. The federal Department of Energy is planning to reduce Weatherization Assistance Program (WAP) funding for the fiscal year 2007 program year by 16% below the current program year, or approximately \$204 million. The federal fiscal year 2008 budget request for WAP includes a 40% reduction in the 2007 funding level. Other proposed reductions are:

- Community Services Block Grant (CSBG): The federal budget request for fiscal year 2008 includes no funding for CSBG. The HRAs use CSBG funds for Homemaker Services, Emergency Assistance, and Information and Referral.
- Low Income Home Energy Assistance Program (LIHEAP): The federal fiscal year 2008 budget request for the LIHEAP block grant includes a 24% reduction.
- Social Services Block Grant (SSBG): The federal fiscal year 2008 budget request for SSBG includes a 29% reduction. HRAs use SSBG funds to provide services to the most vulnerable children and adults, in-home services that prevent many of them from much more costly institutionalization.
- Home Delivered and Congregate Meal Program: The federal fiscal year 2008 budget for Older Americans Act Nutrition Programs reflects approximately a \$4 million reduction from the current levels.

NATIONAL PERFORMANCE INDICATORS

The Government Performance and Results Act of 1993 requires government agencies to establish performance measurements for community services programs. As a result, the federal Department of Health and Human Services Office of Community Services (OCS) developed Results Oriented Management and Accountability (ROMA) as a performance measurement system for states to use in conjunction with Community Services Block Grant programs. ROMA provides the framework for reporting and now has a system of measurements called National Performance Indicators.

ROMA's Development and Six National Goals

Community service programs had traditionally measured output, not outcomes. Examples of output would be the number of elderly clients receiving meals or the number of clients receiving energy assistance. ROMA changed agency reporting from outputs to outcomes. Outcomes are the benefits or changes for clients or a community that are produced as a result of participation in a program. Outcomes describe changes in attitude, knowledge, behavior, condition, or capacity. ROMA established six national goals for reporting. See Table 1.

Table 1
Department of Health and Human Services
Results Oriented Management and Accountability
National Goals

Goal Number	Expected Area of Impact		
	Family Level Goals (1)	Community Level Goals (2)	Agency Level Goals (3)
1	Low-income people become more self sufficient		
2		The conditions in which low-income people live are improved	
3		Low-income people own a stake in their community	
4			Partnerships among supporters and providers of services to low-income people are achieved
5			Agencies increase their capacity to achieve results
6	Low-income people, especially vulnerable populations, achieve		

Goal Number	Expected Area of Impact		
	Family Level Goals (1)	Community Level Goals (2)	Agency Level Goals (3)
	their potential by strengthening family and other supportive environments		

Source: *The Guide to Implementing ROMA for CSBG Agencies in Tennessee*. Revised January 2000. University of Tennessee, Social Work Office of Research and Public Service.

- (1) Contains outcomes that measure the incremental change from dependence to increasing self-sufficiency.
- (2) Contains outcomes that measure the capacity of an agency to build partnerships and collaborations among providers of services to low-income customers, and outcomes that measure the capacity of an agency to operate, measure, and report results in a ROMA framework.
- (3) Contains outcomes that measure the extent to which customers are invested in their communities and outcomes that measure improving conditions in the communities in which people live.

State agencies report annually using the CSBG Information System administered by the National Association for State Community Services Programs (NASCSPP).

However, ROMA did not measure quality of the outcomes. Therefore, the OCS developed National Performance Indicators (NPIs) to report outcomes and provide performance targets against which to measure outcomes. Tennessee’s first year of reporting National Performance Indicators was a report for 2005 that is based on fiscal year 2004 information. According to DHS staff, NASCSPP only requires agencies to report progress on three indicators: 1.1 Employment, 1.3 Economic Asset Enhancement and Utilization, and 6.2 Emergency Assistance. However, agencies choose to report on many more of the indicators for purposes of the ROMA Task Force strategic plan. See Appendix 2 for the indicators and the performance of the HRAs.

University of Tennessee College of Social Work Office of Research and Public Service (UT SWORPS)

Since 1997, The University of Tennessee College of Social Work Office of Research and Public Service (UT SWORPS) has assisted the Tennessee Department of Human Services (DHS), Community Services Division, with ROMA development and now with NPI development. In December 2005, UT SWORPS published a reference manual for DHS and its subrecipients to assist with implementing the reporting of National Performance Indicators. In order to improve consistency in outcome reporting, the manual contains a glossary of terms, planning forms for reporting data, and a guide for organizing and reporting NPIs. In addition, UT SWORPS provides technical assistance and training and is coordinating the establishment of a web-based software program that will permit the agencies to input data.

Community Services Section of the Adult and Family Services Division of the Department of Human Services as Coordinator of NPI Reporting

The staff of the Community Services Section of the Adult and Family Services Division of the Department of Human Services includes a CSBG Program Specialist whose responsibility

is coordinating the implementation of ROMA and NPI for the CSBG agencies (including five HRAs). These five HRAs are Delta, South Central Tennessee, Southeast Tennessee, Southwest Tennessee, and Upper Cumberland. In conjunction with UT SWORPS, the Community Services Section trains, advises, and collects data from the CSBG agencies. When submitting an annual request for funding, each CSBG agency must submit a plan that details how it will address and measure the six national goals. Agencies report quarterly data during the year with data for the entire year (July 1 to June 30) due by September 30. The CSBG Program Specialist compiles the data in a report for the state and submits the prior fiscal year data to NASCSP by March of each year.

DESCRIPTIONS OF HUMAN RESOURCE AGENCY PROGRAMS REVIEWED

Based on information from the HRAs (monitoring reports, annual reports, financial statements, and client data) we determined that the following programs—Transportation, Head Start, Senior Nutrition, Low Income Home Energy Assistance, and the Child and Adult Care Food Program—account for the majority of contract dollars and clients for the nine human resource agencies. We focused our audit work on these programs and reviewed areas such as outreach, client monitoring and tracking, and performance measures. The following information is based on our audit work on those programs.

Low Income Home Energy Assistance Program (LIHEAP)

The Low Income Home Energy Assistance Program (LIHEAP) is a block grant funded by the U.S. Department of Health and Human Services. The program assists low-income households with their home energy needs. Because the home energy costs for low-income households are over four times that of non-low-income households, LIHEAP targets two groups: (1) high-energy-burden households, which are households with the lowest incomes and highest home energy costs; and (2) vulnerable households with frail older individuals, individuals with disabilities, or young children.

The U.S. Department of Health and Human Services allocates LIHEAP funds to states for energy assistance based on a state's low-income households' expenditures for home energy (as a percentage of income) compared to other states. For federal fiscal year 2006, Tennessee's LIHEAP allocation was \$47.1 million (includes all 19 contract agencies, not just the human resource agencies). Federal regulations give states options for establishing LIHEAP eligibility criteria. The Department of Human Services administers LIHEAP and develops the annual State Plan, which details policies and procedures for the program. Six of the nine Human Resource Agencies in this audit contract with DHS to offer LIHEAP in their service areas.

Table 2
HRAs With LIHEAP Programs
FY 2006

Human Resource Agency	Service Area Counties	Contract Dollars	Number of Households Assisted	Maximum Benefit Per Household
Delta	Fayette, Lauderdale, Tipton	\$671,464	2,091	\$400
East Tennessee	Anderson, Campbell, Claiborne, Morgan, Scott and Union	\$1,425,017	4,401	\$400
South Central Tennessee	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Maury, Marshall, Moore, Perry, Wayne	\$1,896,166	7,359	\$350
Southeast Tennessee	Bledsoe, Grundy, Marion, McMinn, Meigs, Polk, Rhea, Sequatchie	\$1,064,829	2,914	\$250
Southwest Tennessee	Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, McNairy, Madison	\$1,522,100	4,276	\$350
Upper Cumberland	Cannon, Cumberland, DeKalb, Fentress, Overton, Pickett, Putnam, Van Buren, Warren, White	\$1,837,544	5,621	\$350

Needs Assessments

HRAs are not required to conduct community needs assessments that are specific to LIHEAP. HRAs rely on their CSBG needs assessments to identify energy assistance needs in their area. In addition, citizens have the opportunity to comment on the program and energy assistance issues at a public hearing, as required by federal guidelines, that the Department of Human Services holds before submitting its annual LIHEAP plan to the federal government. Notices of the hearing are provided to media outlets and to the human resource agencies. Draft plans are made available for review by the contract agencies and the general public.

Outreach and Referral

Federal law requires that a portion of the administrative funds be used for outreach efforts. The State Plan mandates outreach activities that target low-income households, specifically low-income households with members who are frail elderly, disabled, or young children. The HRAs distribute posters and/or notices to community organizations and other groups with substantial contacts with the eligible population. HRAs have informational meetings with energy suppliers, volunteer organizations, and other interest groups to explain the terms of eligibility and to identify potentially eligible households. Some HRAs also submit

announcements to local newspapers and radio stations. Program directors mentioned that many clients are referred to LIHEAP from other programs within their agencies as well as from other organizations. The client files we reviewed included only a question on the application that asks if the household is interested in Weatherization Assistance. HRAs that provide LIHEAP assistance also offer Weatherization Assistance services. Section 71-5-401(1)(B)(i), *Tennessee Code Annotated*, requires no less than 10% of LIHEAP funds to be used for the weatherization program. See Table 4 for file review results on Weatherization Assistance.

Access to Services

LIHEAP applications are available in the HRAs' county offices and neighborhood service centers. The HRAs leave applications at senior centers and with energy providers. Upon request, interested persons can receive applications by mail from their area LIHEAP provider. DHS requires the HRAs make staff available on a daily basis in each county served to receive applications during their designated intake days, which are established by the HRAs. HRAs are also required to make staff available for those applicants who request assistance in completing their applications and for those who have difficulty leaving home. Applications may be returned by mail to the agency or through a scheduled appointment.

Intake and Eligibility

After the clients submit the applications, staff at county offices process, approve, and send the applications to the HRA central office. The HRA central office staff then review the applications to ensure that all documentation is appropriate and enter the information into a computer system that processes the application and payment. The HRAs make payments directly to the utility company. Local energy suppliers sign an agreement with the HRA to receive checks on behalf of customers the company serves.

To be income-eligible for LIHEAP, a household's gross annual income must not exceed 125 percent of the federal poverty guidelines. All files we reviewed had appropriate income documentation and evidence that clients met the income eligibility guidelines.

LIHEAP directors determine if all eligibility requirements are met and use the priority points system established by DHS to calculate benefit levels and rank applications. Under this system, applicant households are given points based on their income, energy burden, number in household, and energy need. The purpose of the priority points system is to ensure the neediest are served first. Program directors said they did not have waiting lists but that there were households who did not receive assistance because funds were depleted.

Client Monitoring and Tracking

The LIHEAP offices in all HRAs maintain hard copies of LIHEAP client files. Client files include a copy of the application, date of application, amount of assistance, energy cost verification, and income documentation. In addition to the hard copies, HRAs record and track client information in a database provided by DHS. The database captures the same information as the paper file. See Table 5 for file review results.

Case Management

Case management services are not offered to LIHEAP recipients. Staff determine the client’s need but do not establish goals for the client. Program directors believe a large number of clients receive assistance year after year and most are repeat clients who are elderly and/or handicapped and live on a fixed income.

Monitoring

The monitoring staff of the Department of Human Services, Office of Program Review, are responsible for the LIHEAP program monitoring and publish a report upon completion of the review. We reviewed the most recent monitoring report for the six HRAs with LIHEAP programs as part of our audit. Table 3 summarizes the LIHEAP findings by HRA. The federal government has not monitored the program in several years.

**Table 3
Office of Program Review, Department of Human Services
LIHEAP Monitoring Results for 2006**

Human Resource Agency	Date of Review	Findings
Delta	January 2006	Annual LIHEAP report not submitted timely.
East Tennessee	March 2006	(1) Amounts requested for reimbursement exceeded the expenditures. This is a repeat finding from the prior review. (2) The Policy 03 Quarterly Report did not comply with the F&A reporting requirements. (3) Personnel costs are not properly allocated. (4) Expenditures recorded and reported for reimbursement did not adhere to Grant Budget line-item limitations. (5) Vehicle maintenance expenses, in addition to mileage charges, were reported for reimbursement. (6) Payments to utility companies for assistance to individuals did not have adequate supporting documentation.
South Central Tennessee	February 2006	Agency did not notify applicants for regular assistance of their application status within 90 days of the designated closing dates.
Southeast Tennessee	February 2006	No findings.
Southwest Tennessee	March 2006	Annual LIHEAP report not submitted timely.
Upper Cumberland	February 2006	(1) Estimates were used to prepare reimbursement requests. (2) Policy 03 reports and reimbursement requests did not agree.

Performance Measures

When applying to DHS for a LIHEAP grant, the human resource agencies report on households applying for and assisted by LIHEAP during the prior year. DHS reports the data to the federal government, including

- number and income level of households assisted,
- number of households assisted with at least one young child,
- income levels of household applying for LIHEAP, and
- number of assisted households with one or more individuals who are 60 years or older or who are disabled.

See Table 5 for information on types of households assisted.

Study by U.S. Government Accountability Office (GAO)

As indicated above, DHS reports LIHEAP program data to the U.S. Department of Health and Human Services (HHS), but the federal government does not audit LIHEAP. In September 2005, the Government Accountability Office released the study *Oversight of Low Income Home Energy Assistance Program Payments*. The study concludes that HHS relies on the states, as grantees, to oversee the LIHEAP program. Because the Single Audit Act made state and local governments responsible for obtaining independent audits of funds they receive from federal programs, HHS's principal oversight function is to monitor, not audit, LIHEAP payments made by grantees. Monitoring includes assessing the quality of single audits, reviewing audit results, and ensuring that corrective actions are taken to resolve audit findings. The Government Accountability Office's review of 2004 Single Audit Act reports showed that LIHEAP costs questioned involve relatively small sums.

Supplements to LIHEAP

Many states find ways to supplement their LIHEAP programs through government appropriations, utility regulation, or special taxes. Appendix 3 shows methods Tennessee's neighboring states use to supplement energy assistance and energy efficiency funds. According to the information compiled by the LIHEAP Clearinghouse, Tennessee does not supplement LIHEAP funds with additional state appropriations. However, utilities in Tennessee do provide some limited emergency funds. Customer donations combine with company donations to help customers who are elderly, disabled, or unable to pay their utility bill in case of extreme emergency.

Client File Reviews

We reviewed a total of 317 LIHEAP files at the six agencies that administer the program. The files contained documentation that clients met the eligibility requirements. Applications were complete and had been reviewed and approved by program staff. Applications showed that

35 LIHEAP recipients had received Weatherization Assistance in the past, and 62 expressed an interest in the program’s services. Client files included household information regarding vulnerable members (i.e., elderly, disabled, and young children). See Tables 4 and 5.

Table 4
LIHEAP File Review
Weatherization Assistance Program (WAP) Answers on Applications

Human Resource Agency	Total Files Reviewed	Yes to Prior WAP Service	Yes to Interested in WAP Service
Delta	40	1	2
East Tennessee	20	2	5
South Central Tennessee	69	16	9
Southwest Tennessee	88	4	15
Southeast Tennessee	40	6	12
Upper Cumberland	60	6	19
Total Number	317	35	62
Percentage		11%	20%

Table 5
LIHEAP File Review
Household Characteristics

Human Resource Agency	Total Files Reviewed	Households With Persons 60 Years of Age or Older	Households With Children Five Years of Age or Younger	Households With Disabled Persons
Delta	40	17	3	14
East Tennessee	20	6	2	8
South Central Tennessee	69	38	4	16
Southwest Tennessee	88	34	13	6
Southeast Tennessee	40	26	1	11
Upper Cumberland	60	23	7	25
Total Number	317	144	30	80
Percentage		45%	9%	25%

Transportation

Eight of the nine human resource agencies offer transportation services. The programs may be a combination of transportation service for any or all of the following:

- the general public,
- the elderly and/or disabled,
- Families First recipients,
- persons with low incomes, and
- TennCare recipients.

Rural Transportation Program – Section 5311

The Rural Public Transportation Program provided through the U.S. Department of Transportation's Section 5311 program, is administered by the Tennessee Department of Transportation and funded with federal, state, and local dollars (as well as revenue from fares). The Tennessee Department of Transportation contracts with eight of the nine human resource agencies to provide transportation services in their service areas (see map on page 3). Section 5311 of the Federal Transit Act of 1964 was passed to provide a formula grant program for providing transportation services in nonurban areas. Funds for nonurbanized areas are apportioned to states according to a statutory formula based on the state population in rural and small urban areas with less than 50,000 residents. Funds are provided for capital assistance, operating assistance, and project administration. The goals of the program are

- to enhance access of people in nonurbanized areas to health care, shopping, education, employment, public services, and recreation;
- to assist in maintenance, development, improvement, and use of public transportation systems in rural and small urban areas;
- to facilitate the coordination of programs and services funded by other federal programs;
- to provide for the participation of private transportation providers; and
- to provide an equivalent level of transportation service to citizens with disabilities in nonurbanized areas.

The Tennessee Department of Transportation (TDOT) acts as a pass-through agency for the federal funds, combining those funds with state and local matching funds, and then contracting with the human resource agencies and other local rural transportation providers. According to TDOT staff, funding for this program is allocated based on a system's

- total nonurbanized population,
- total number of counties in its service area, and

- total number of vehicles in fleet.

See Table 6 for fiscal year 2006 funding and Table 7 for number of vehicles and drivers.

**Table 6
Rural Transportation Operators Funding Sources
Fiscal Year 2006**

Human Resource Agency	Section 5311	Families First	Job Access	Other
Delta	\$658,096	\$261,766	\$113,181	\$119,453
East Tennessee	\$2,420,390	\$233,373	\$186,986	\$1,940,489
First Tennessee	\$1,176,164	\$605,475	\$217,500	\$224,248
Mid-Cumberland	\$1,887,796	\$1,124,454	\$600,000	\$1,734,419
Northwest Tennessee	\$1,323,036	\$383,486	\$261,000	\$295,130
Southeast Tennessee	\$1,453,485	\$735,468	\$125,853	\$163,398
Southwest Tennessee	\$1,140,654	\$518,979	\$180,000	*
Upper Cumberland	\$1,646,659	\$563,482	\$450,000	\$272,118

*Information not available.
Source: agency contracts.

**Table 7
Human Resource Agency Transportation Fleets and Drivers
June 2006**

Human Resource Agency	Total Vehicles	Vehicles Equipped With Wheelchair Lifts	% Equipped With Wheelchair Lifts	Drivers (2)
Delta(1)	48	27	56%	34
East Tennessee(2)	84	64	76%	117
First Tennessee(2)	58	38	66%	62
Mid-Cumberland(2)	85	59	69%	79
Northwest Tennessee(1)	68	36	53%	84
Southeast Tennessee(2)	80	55	69%	107
Southwest Tennessee(2)	100	50	50%	79

Human Resource Agency	Total Vehicles	Vehicles Equipped With Wheelchair Lifts	% Equipped With Wheelchair Lifts	Drivers (2)
Upper Cumberland(2)	91	59	65%	85

Sources: (1) 2006 annual reports, (2) agency staff.

Program clients are anyone from the general population that needs transportation. Clients schedule their own rides, pay fares, and are transported to and from their destination. See Table 8 for programs by agency.

**Table 8
Transportation Program by Agency**

Human Resource Agency	Section 5311	Families First	Jobs Access	TennCare
Delta	√	√	√	√
East Tennessee	√	√	√	√
First Tennessee	√	√	√	√
Mid-Cumberland	√	√	√	√
Northwest Tennessee	√	√	√	√
Southeast Tennessee	√	√	√	√
Southwest Tennessee	√	√	√	√
Upper Cumberland	√	√	√	√

Source: agency annual reports.

Elderly Transportation

First Tennessee, Mid-Cumberland, Northwest Tennessee, Upper Cumberland, and Southwest Tennessee Human Resource Agencies contract with their Area Agency on Aging and Disability to provide what is referred to as Title IIIB Transportation or IIIB trips. This is a service under Title III of the Older Americans Act, Title IIIB Supportive Services, designed to improve the mobility of elderly individuals. This service is available to anyone over the age of 60. Clients schedule a trip, and the HRA van transports them to and from their destination for a fare. In addition, the Section 5311 Rural Transportation program contracts include a statement regarding elderly and disabled clients: “A.2 . . . The Grantee shall give ridership priority to elderly and disabled residents in need of health care on an as needed basis in the area.” Client files at Mid-Cumberland and Southwest Tennessee Human Resource Agency contain a basic client information form that includes birth date as a method of determining eligibility. Other agencies track elderly clients with the rest of the Section 5311 rural program.

Families First Transportation

This program serves the Families First participants by providing transportation to jobs and training as part of compliance with their Personal Responsibility Plan. The program is administered by the Tennessee Department of Human Services through an interdepartmental agreement between DHS and TDOT.

Clients receive this service either by riding a van at no charge, or using their own transportation and receiving reimbursement on a per-day basis. Clients are referred to this program by their DHS caseworker, who sends a referral form to the human resource agency. These referral forms are kept in the client's file, along with attendance sheets, and information that would reflect any changes in program status. According to the TDOT Program Manager for the Rural Transportation Program, different DHS area managers have different requirements for record keeping and eligibility verification responsibilities.

Initial eligibility for the program is handled through the DHS Families First program. The contract between DHS and TDOT requires service providers such as the HRAs to inform TDOT of client attendance.

Job Access Transportation

The Job Access program, known alternately as "Access to Jobs," provides transportation to and from work for eligible low-income individuals. The program focuses on expanding transportation services for Families First recipients and low-income persons, by providing rides to and from work. The Federal Transit Administration encourages states to collaborate Job Access programs with Workforce Development agencies in order to facilitate low-income persons' finding a way to work. Clients provide work schedules to the HRA so appropriate transportation can be arranged for them. The purpose of this service is to provide transportation to work for those who could not otherwise afford it; there is no fee for this service. According to HRA staff, employers sometimes refer their employees to the HRA for this program, but word of mouth and the visibility of the HRA vans is often enough for potential clients to call and inquire about the program. In addition, referrals from Families First programs provide program awareness.

Authority for the Program

This program is part of Section 3037 of the TEA-21 legislation (the Transportation Equity Act for the 21st century). According to TDOT staff, funding for this program is allocated based on the following factors:

- narrative of the program,
- letter of interest,
- current spending level,
- future goals [expansion],

- proposed budget, and
- information on ridership.

Eligibility Requirements and Authority

Potential clients are eligible for this program if they are within 150% of the poverty guidelines set forth in the Community Services Block Grant Act, or have been participants in the Families First Program. Clients must also be employed.

TennCare Transportation

Eight of the human resource agencies are service providers and subcontractors for TennCare Transportation. The human resource agencies contract with TennCare service providers, such as BlueCross BlueShield, to provide transportation services. Clients are transported to and from medical services in accordance with the manifest TennCare provides the agencies. The human resource agencies do not maintain client files or eligibility information.

Number of Clients

All agencies maintain client lists either by county and program or by program only. See Table 9 for clients and trips by program.

**Table 9
Transportation Clients
FY 2006**

Human Resource Agency	Total Clients	Total Trips
Delta (1)	39,786	66,903
East Tennessee (2)	11,749	240,704
First Tennessee (2)	5,242	116,506
Mid Cumberland (2)	6,508	172,078
Northwest Tennessee (1)	6,401	194,472
Southeast Tennessee (1), (2)	844	199,578
Southwest Tennessee (2)	14,502	120,094
Upper Cumberland (1)	8,629	220,636

Sources: (1) 2006 agency annual report (2) agency staff.

Complaint Handling

When we reviewed complaints at the agencies, we found that while some agencies said they have not received any complaints, other agencies had written notes that served as complaint logs. Because the agencies varied in the methods used to document and resolve complaints, we determined that the agencies need to adopt a uniform system for processing complaints. See observation and comment on page 43.

Fleet Americans with Disabilities Act Requirements

TDOT Americans with Disabilities Act policy states that Section 5311 Rural Transportation subrecipients are required to maintain approximately 50% of their total fleet with wheelchair-lift-equipped vehicles. We found that all of the human resource agencies met the requirement. See Table 7 on page 14 with total vehicles and the percentage equipped with wheelchair lifts.

Insurance Requirements

Section 5311 rural transportation contracts require grantees to maintain at least \$1,000,000 worth of single-incident liability insurance. During our review, we examined insurance policies at the various agencies and found that all agencies met the necessary requirements.

Van Driver Requirements

All van drivers are required to undergo pre-employment drug testing, criminal background checks, and a motor vehicle record check. These are required by either federal, state, or agency policy.

Drug Tests

Pre-employment drug screens have federal requirements set forth in 49 CFR 655.21. The federal law requires that employers conduct pre-employment drug screens on all applicants for safety-sensitive positions before they can perform a safety-sensitive operation (driving a van or bus is considered a safety-sensitive operation). Pre-employment drug screening has been in effect since 1991, according to “Federal Register / Vol. 66, No. 83 / Monday, April 30, 2001 / Proposed Rules.” During our review of driver files, we found that one driver did not have a pre-employment drug screen. See Finding 4.

Background Checks

The Section 5311 Rural Transportation contracts between the HRAs and TDOT include the following clause regarding criminal background checks of drivers:

A.11 The Grantee shall acquire a criminal background check of prospective employees who will have direct contact with riders

During our review, we examined driver files for pre-employment background checks. Two van drivers did not have pre-employment background checks. See Finding 4.

Motor Vehicle Record Checks

Agency policy manuals indicate that van drivers must keep a clean driving record during their employment with the HRA. National Driver's Records Verification checks are conducted on all van drivers at the time of application and every year thereafter. During our review, we did not find discrepancies in the documentation of motor vehicle record checks.

Training for Van Drivers

The Section 5311 Rural Transportation contracts between the HRAs and TDOT include the following clause regarding training for van drivers:

A.13 The Grantee shall send all transportation employees to the appropriate training workshops sponsored by the Tennessee Transit Training Center (TTTC).

During our review, we checked driver files for certificates of completion for TTTC courses or reviewed training rosters from transportation staff. Some agencies did not ensure that van drivers received proper training from the Tennessee Transit Training Center. See Finding 5.

Hepatitis B Vaccination

The Section 5311 Rural Transportation contracts between the HRAs and TDOT include the following clause regarding Hepatitis B vaccinations:

A.8 In compliance with OSHA regulations, the Grantee must make accessibility to Hepatitis B vaccinations available to all transportation drivers employed by the Grantee.

We reviewed driver files to determine whether the HRAs had complied with the contract clause. Several agencies did not offer Hepatitis B vaccines to the van driver or did not document the offer, in violation of federal OSHA regulations. See Finding 2.

Client Files

During our review, we examined client files of the Job Access, Families First, elderly transportation, and Title IIIB nutrition programs for eligibility documentation. This includes proof of income and employment, DHS referrals, work schedules, proof of age, or other documentation that indicated the client was eligible. Some agencies did not have eligibility documentation for the Families First and Job Access transportation programs. See the observation and comment on page 38 for the file review results.

Oversight and Monitoring

Section 5311 Transportation Program Monitoring

The TDOT Program Manager for the Rural Transportation Program conducts monitoring for Section 5311 Rural Transportation on an annual basis. According to the Section 5311 managerial review tool, this monitoring involves an examination of agency policy manuals, a limited review of staff credentials, Title VI complaints, trip denial information, advertisement policies, intercity services, alcohol and drug testing policies, prior audit findings by outside firms, vehicle maintenance issues, ridership trends, long-term planning goals, safety, and training.

The following are some examples of areas identified as needing improvement by the TDOT 5311 monitor:

Table 10
TDOT Monitoring of Section 5311 Programs

Human Resource Agency	Date of Review	Findings
Delta	April 2005	After any type of training workshop or class, each driver/transportation staff needs to sign a written statement acknowledging completion of the course. The certification statement should be kept in the driver's training folder.
East Tennessee	November 2004	(1) Add a statement in your policy book referencing the use of service animals (e.g., guide dogs). (2) Specify the type of training/certifications required by mechanics.
First Tennessee	September 2004	(1) Drug and alcohol files pertaining to the transportation staff need to be kept separate from the personnel files and should be locked at all times except when in use by the transportation director or the designated person authorized to handle test results. The designated person receiving D/A results needs a fax machine in their work area. (2) TDOT Civil Rights Office will contact FTHRA concerning Title VI training.
Mid-Cumberland	April 2005	(1) After any type of training workshop/class, each driver/transportation staff needs to sign a written statement acknowledging completion of the course. The certification statement should be kept in the driver's training folder. (2) Individual criminal background check information should be kept separate from drug and alcohol and training information.
Northwest Tennessee	April 2005	(1) Maintain individual file folders for the transportation staff training, personnel, and drug/alcohol information. (2) The drug/alcohol information should be kept in a locked file. Drug/alcohol information should be accessible only by the drug/alcohol coordinator. (3) Submit a copy of your drug/alcohol policy.

Human Resource Agency	Date of Review	Findings
Southeast Tennessee	November 2004	(1) Paramedics working as back-up drivers should be in the SETHRA transportation drug and alcohol random drug pool. (2) Submit a copy of each employee's certificate of completion for the safety and security training provided by the Transportation Safety Institute.
Southwest Tennessee	April 2005	Offer drivers the opportunity to take the hepatitis vaccine. If the driver declines, a refusal statement should be signed by the employee and placed in their personnel file.
Upper Cumberland	August 2006	No Findings.

Source: TDOT staff.

Families First Transportation Program Monitoring

The TDOT Families First Resource Development Program Director performs an on-site review of the Families First Transportation Program. This review includes a review of accounting procedures, a review of client files, and a review of driver credentials and records. One recent review of the Mid-Cumberland Families First Transportation program found the following problems: Customer files were in inaccessible form, and documentation required for accurate reimbursement (attendance sheets, work schedules, and check stubs) were unavailable to the reviewer.

A similar finding was present in the Families First contract review for Southeast Tennessee HRA conducted in December 2004.

Job Access Transportation Program Monitoring

Formerly, the Department of Finance and Administration's Office of Program Accountability Review monitored the Job Access program. One of its findings taken on the Mid-Cumberland Human Resource Agency from 2003 reported that the agency did not consistently maintain documentation of eligibility for services for clients eligible for transportation under the Job Access Program. Another finding noted that the agency does not provide weekend transportation.

Monitoring for the Job Access program is currently performed during TDOT's Section 5311 managerial reviews using the Section 5311 managerial review tool. According to TDOT staff, they do not monitor this program separately at this time but plan to begin doing so in fiscal year 2007.

Performance Measures

Generally, HRA transportation programs do not have formalized performance measures, and they are not required to. The exception to this is the Mid-Cumberland Human Resource

Agency, where the Transportation Director and the Director of Operations have developed a set of driver performance measures. These measures take into account the time spent on trips versus number of trips, etc. The Transportation Director uses these measures as a guideline for how the drivers are performing and as an attempt to identify potential operational inefficiencies. According to some agency staff, the statewide Intelligent Transportation System being developed by RouteMatch should help alleviate any performance problems transportation programs are experiencing by streamlining coordination of trip schedules. See observation and comment on page 37.

Child and Adult Care Food Program

The Child and Adult Care Food Program (CACFP), is a federally funded grant from the U.S. Department of Agriculture. The program reimburses eligible child and adult daycare providers for meals furnished to their enrollees. Because the meals are provided for free or at a reduced rate, the program makes daycare more affordable for low-income families.

Administered by the Tennessee Department of Human Services (DHS), CACFP is authorized under Section 17 of the National School Lunch Act (42 U.S.C. 1766) and program regulations are issued by the U.S. Department of Agriculture (USDA) under 7 CFR, part 226. Under the provisions of the program, sponsoring agencies (human resource agencies) enter into agreements with daycare providers. The providers are required to serve meals meeting USDA nutrition requirements.

Four of the nine human resource agencies in this audit contract with DHS to offer CACFP in their service areas. See Table 11.

**Table 11
HRAS with CACFP Programs
2006 Program Dollars**

Name	Service Area Counties	Program Dollars
East Tennessee	Anderson, Blount, Campbell, Claiborne, Cocke, Cumberland, Grainger, Hamblen, Jefferson, Knox, Monroe, Morgan, Roane, Scott, Sevier, Union	\$830,547
First Tennessee	Hancock, Hawkins, Greene, Washington, Unicoi, Carter, Sullivan, Johnson	\$477,815
Southeast Tennessee	Bedford, Bledsoe, Bradley, Coffee, Davidson, Franklin, Giles, Grundy, Hamilton, Hardin, Lewis, Lincoln, Marion, Marshal, Maury, McMinn, Meigs, Montgomery, Perry, Polk, Rhea, Robertson, Rutherford, Sequatchie, Warren, Wayne, Wilson	\$1,527,730

Name	Service Area Counties	Program Dollars
Upper Cumberland	Bedford, Cannon, Clay, Coffee, Cumberland, Davidson, DeKalb, Fentress, Franklin, Giles, Jackson, Lewis, Lincoln, Macon, Marshall, Maury, Moore, Overton, Pickett, Putnam, Rutherford, Smith, Sumner, Van Buren, Warren, Williamson, Wilson, White	\$1,280,059

Program Eligibility

Daycare facilities must either be licensed by the Department of Human Services (DHS) or classified as Alternative Approved Child Care Providers that have been approved by the human resource agency for participation in the program. A provider cares for four or fewer non-residential children and is required to complete forms and submit to an inspection prior to approval.

Reimbursement for meals is determined by economic need, based on either the location of the provider (tier 1), the household income of the provider (tier 1), or the household income of each enrolled child (tier 2).

The human resource agencies use public school data or census data to determine which areas are low-income (tier 1). A daycare home in which the provider's household income is at or below 185% of the federal income poverty guidelines is considered a tier 1 reimbursement level. The provider of a Tier 2 home requests that the human resource agency staff complete and maintain eligibility applications that identify the low-income children enrolled in the daycare who are qualified for reimbursable meals.

The provider maintains daily records of (1) meals served and (2) children enrolled and present each day. Monthly reimbursement requests are submitted to the human resource agencies based on the number of meals served.

Access to Services

Daycare providers learn about CACFP from providers with existing agreements and from the DHS licensing staff. Agencies complete site visits for compliance reviews and then the provider completes an application and is enrolled.

Outreach and Referral

Each agency approved for participation in the program must distribute news releases announcing its participation in the program to community, minority, and local news agencies. The releases must be approved by DHS before distribution.

Case Management

The human resource agency is responsible for monitoring each daycare receiving meal reimbursements. Each provider home must be visited at least three times each program year. The visits must occur not more than six months apart. One visit must occur during the first four weeks of the program and two visits must be unannounced. The visits usually occur at mealtime to ensure that the providers are adhering to the mandatory menu items set out by the U.S. Department of Agriculture. For each visit, the monitor completes a review guide which must be signed by both the monitor and the provider. The guide includes information on meals observed, review of enrollment forms, and food sanitation procedures.

Monitoring

DHS's Office of Program Review completes monitoring reviews of the CACFP program at the human resource agencies. See Table 12 for the most recent reviews and findings.

Table 12
CACFP Monitoring by DHS

Human Resource Agency	Date Monitored	Findings
East Tennessee	March 2007	No findings
First Tennessee	September 2006	No findings
Southeast Tennessee	March 2005	Overpayment to agency for January 2005 claiming period
Upper Cumberland	March 2007	No findings

Other Programs Using CACFP

In addition to assisting low-income daycare families, CACFP is used by South Central Tennessee Human Resource Agency, Southwest Tennessee Human Resource Agency, and Upper Cumberland Human Resource Agency in their Head Start Programs. First Tennessee Human Resource Agency uses the program in conjunction with its Adult Day Care Program.

Client File Reviews

We reviewed a total of 67 CACFP provider files at the four agencies that administer the program. The files contained documentation that providers had agreements with the HRAs and were being monitored as the program stipulates. See Table 13.

**Table 13
CACFP Provider File Reviews**

Human Resource Agency	Number of Provider Files Reviewed	Number of DHS Licensed Daycare Providers	Number of Alternate Approval Process Providers	Total Number of Children Cared For by Providers Reviewed	Monitoring Performed as Contract Stipulates
East Tennessee	21	19	2	216	Yes
First Tennessee	6	4	2	54	Yes
Southeast Tennessee	20	12	8	189	Yes
Upper Cumberland	20	18	2	218	Yes
Totals	67	53	14	677	

Head Start Program

The federal Head Start Program provides developmental and academic assistance in a classroom setting for children ages three to five years old from low-income families. Early Head Start is offered to children up to three years of age. The program’s mission is to prepare them for success in elementary school by working to meet the needs of the child and the family. Children receive health screenings and referrals to needed services. They participate in preschool programs tailored to their needs, based on the results of intake assessments, with a focus on preparation for the elementary school setting. The program encourages parents to become involved through participation in their children’s activities. Three human resource agencies in this audit offer the program in their service areas. See Table 14 for agencies with the program, service areas, and FY 2006 contract amount.

Funding

The program is federally funded through and monitored by the U.S. Department of Health and Human Services (HHS), Administration for Children and Families, Head Start Bureau. The Head Start program policy is governed by 45 *Code of Federal Regulations* (CFR), Parts 1301-1311. These rules outline, among other things, the policy for grant awards, client recruitment and eligibility, staffing requirements, and performance standards. Contracts are awarded on a continual basis, as long as the agency has not exhibited major deficiencies, but agencies must

reapply annually for funding authorization. The application consists of a statement of need, a community needs assessment, a statement of intent to meet performance standards, and a management profile. No state funds are used to administer this program.

Table 14
Head Start and Early Head Start
2006 Service Areas and Program Dollars

Human Resource Agency	Head Start Service Area	Program Dollars	Early Head Start Service Area	Program Dollars
South Central Tennessee	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne	\$6,295,722	Bedford, Giles, Lawrence	*
Southwest Tennessee	Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, McNairy	\$4,259,585	N/A	N/A
Upper Cumberland	Van Buren	\$402,350	N/A	N/A

* Early Head Start funds are included with Head Start funds.

Two of the agencies, Southwest Tennessee and South Central Tennessee, administer the Head Start classrooms from the central office, but no central office staff teach in the classrooms. South Central Tennessee's program management is site-based, which means that each Head Start center in their service area has an administrator that reports to the central office. Southwest Tennessee also operates a site-based program. Upper Cumberland HRA operates one center in Van Buren County, which is run day-to-day by central office staff. Head Start students are served in classroom settings and tracked according to which classroom they attend. See Table 15 for the number of classrooms and enrollees.

Table 15
Human Resource Agency Head Start Programs
Number of Classrooms and Enrollees (FY 2006)

Human Resource Agency	Number of Head Start Centers	Number of Head Start Classrooms	Number of Head Start Enrollees	Number of Early Head Start Centers	Number of Early Head Start Classrooms	Number of Early Head Start Enrollees
South Central Tennessee	26	56	1,162	3	6	92
Southwest Tennessee	18	31	695	N/A	N/A	N/A
Upper Cumberland	1	2	38	N/A	N/A	N/A

Outreach

The Human Resource Agencies that administer Head Start programs do several things to reach out to the community and recruit more enrollees. Activities include handing out fliers door to door, collaborating with local organizations to raise public awareness, and running ads in the newspaper. In addition, word of mouth helps raise community awareness of the program.

Program Eligibility

According to 45 CFR, Part 1305.4, children must be at least three years old by the eligibility date for public school in their area. Families apply for the program by completing an application. At least 90% of the children enrolled in the program must be from low-income families. Income eligibility is determined by federal poverty-level guidelines. Applicants submit verification in the form of tax returns, pay stubs, pay envelopes, employer letters, or documentation that the family is on public assistance.

We reviewed enrollee files at the three human resource agencies with Head Start programs. According to the Head Start policies at the three agencies, health, vision, dental, speech, and mental health screens; home visit records; and developmental assessments are required to be in a paper file for each enrollee. Enrollee files at Upper Cumberland and Southwest Tennessee HRAs were complete. However, enrollee files at South Central Tennessee HRA did not contain all necessary documentation. See Finding 1.

Waiting Lists

According to 45 CFR, part 1305.6, Head Start programs are required to maintain waiting lists for eligible children who cannot be served because of lack of funding. At least one agency,

Upper Cumberland HRA, identified an issue with waiting lists. According to the Upper Cumberland HRA Head Start program director, there are some children that are above income guidelines that are allowed in the program simply because other children's families do not get the necessary paperwork filled out in time to be enrolled.

**Table 16
Head Start Waiting Lists**

Human Resource Agency	Number on Waiting List	Earliest Waiting List Entry Date
South Central Tennessee	483	June 2005
Southwest Tennessee	161	January 2004
Upper Cumberland	20	August 2006

Oversight and Monitoring

The U.S. Department of Health and Human Services monitors Head Start programs every three years. Southwest Tennessee Human Resource Agency was most recently monitored in 2003, Upper Cumberland Human Resource Agency was most recently reviewed in 2004, and South Central Tennessee Human Resource Agency was most recently monitored in 2005. Table 17 lists some of the deficiencies noted in the most recent monitoring reports:

**Table 17
Head Start Monitoring Results**

Human Resource Agency	Date of Most Recent Monitoring	Deficiencies
South Central Tennessee	November 2005	Policy Council bylaws exhibited deficiencies, Community Assessments were not implemented, Agency would not meet with members of community to address concerns, lack of a 2003-2004 self assessment, staff organization did not facilitate achieving program goals, improperly maintained facilities, program did not meet enrollment goals, transportation was deemed unsafe due to poor maintenance of vehicles
Southwest Tennessee	April 2003	Unlicensed mental health consultants
Upper Cumberland	March 2004	One quarterly expense report was filed late with improperly accrued expenses

Prior to the 2005 monitoring, South Central Tennessee had two policy council meetings, one of which was called to discuss the reorganization of the Head Start Program. At the May 2005 meeting, a consultant for the Head Start program and two staff of the Regional Head Start

office in Atlanta were present. The consultant is now the director of the Head Start program at South Central Tennessee Human Resource Agency. At this meeting, the Regional Head Start staff stated that the program had been found deficient the past two evaluations (a span of six years) and implied that funding could be cut if deficiencies were not corrected.

Complaint Handling

One program, Southwest Tennessee HRA, reported no complaints within the past several years. Because of this, there were no complaint files to examine. Staff stated that they obtain the client’s side of the story and follow up with the employee the complaint was filed against. South Central Tennessee Head Start has a formal complaint resolution process. We reviewed this policy, and it appears adequate.

Case Management

Case management is an important part of Head Start programs. All programs perform case management services for a child’s family in addition to services for the children themselves. For example, they assist children’s parents with obtaining a GED, finding employment, and transporting children to the doctor when needed, and they refer families and children to other needed services. Formal tools, such as the Creative Curriculum Assessments, can be used to help determine a family’s needs.

Performance Measures

Performance Measures for the Head Start program are federally mandated by 4 CFR, Part 1304. These performance measures govern such things as child health and safety, child nutrition, child mental health, human resource standards, and the handling of deficiencies found in federal evaluations.

Related to these federally mandated performance measures is the Child Outcomes Framework, developed in 2000. This framework is intended to assist program staff in ongoing assessment of accomplishments and is broken down into domains, domain elements, and indicators as listed in the chart below. Some indicators are federally mandated in 45 CFR, Parts 1301, 1302, 1303, 1304, 1305, 1306, and 1308; and others have been developed by the Head Start Bureau. (Mandated indicators are in bold print.)

**Head Start Program
Child Outcomes Framework**

Domain	Domain Element	Examples of Indicators
Language Development	Listening and Understanding	<ul style="list-style-type: none"> • Understands an increasingly complex and varied vocabulary. • For non-English-speaking children, progresses in listening to and understanding English.

Domain	Domain Element	Examples of Indicators
	Speaking and Communicating	<ul style="list-style-type: none"> • Develops increasing abilities to understand and use language to communicate information, experiences, ideas, feelings, opinions, needs, questions; and for other varied purposes. • Uses an increasingly complex and varied spoken vocabulary. • For non-English-speaking children, progresses in speaking English.
Literacy	Phonological Awareness	<ul style="list-style-type: none"> • Associates sounds with written words, such as awareness that different words begin with the same sound. • Shows increasing ability to discriminate and identify sounds in spoken language.
	Book Knowledge and Appreciation	<ul style="list-style-type: none"> • Shows growing interest and involvement in listening to and discussing a variety of fiction and non-fiction books and poetry.
	Print Awareness and Concepts	<ul style="list-style-type: none"> • Recognizes a word as a unit of print, or awareness that letters are grouped to form words, and that words are separated by spaces.
	Early Writing	<ul style="list-style-type: none"> • Develops understanding that writing is a way of communicating for a variety of purposes.
	Alphabet Knowledge	<ul style="list-style-type: none"> • Identifies at least 10 letters of the alphabet, especially those in their own name. • Knows that letters of the alphabet are a special category of visual graphics that can be individually named.
Mathematics	Number and Operations	<ul style="list-style-type: none"> • Demonstrates increasing interest and awareness of numbers and counting as a means for solving problems and determining quantity.
	Geometry and Spatial Sense	<ul style="list-style-type: none"> • Begins to recognize, describe, compare, and name common shapes, their parts and attributes.
	Patterns and Measurement	<ul style="list-style-type: none"> • Enhances abilities to recognize, duplicate, and extend simple patterns using a variety of materials.
Science	Scientific Skills and Methods	<ul style="list-style-type: none"> • Begins to use senses and a variety of tools and simple measuring devices to gather information, investigate materials, and observe processes and relationships.
	Scientific Knowledge	<ul style="list-style-type: none"> • Expands knowledge of and abilities to observe, describe, and discuss the natural world, materials, living things, and natural processes.
Creative Arts	Music	<ul style="list-style-type: none"> • Participates with increasing interest and enjoyment in a variety of music activities, including listening, singing, finger plays, games and performances.

Domain	Domain Element	Examples of Indicators
	Art	<ul style="list-style-type: none"> • Gains ability in using different art media and materials in a variety of ways for creative expression and representation.
	Movement	<ul style="list-style-type: none"> • Expresses through movement and dancing what is felt and heard in various tempos and styles.
	Dramatic Play	<ul style="list-style-type: none"> • Participates in a variety of dramatic play activities that become more extended and complex.
Social and Emotional Development	Self-Concept	<ul style="list-style-type: none"> • Begins to develop and express awareness of self in terms of specific abilities, characteristics, and preferences.
	Self-Control	<ul style="list-style-type: none"> • Shows progress in expressing feelings, needs, and opinions in difficult situations and conflicts without harming themselves, others, or property.
	Cooperation	<ul style="list-style-type: none"> • Increases abilities to sustain interactions with peers by helping, sharing, and discussion.
	Social Relationships	<ul style="list-style-type: none"> • Demonstrates increasing comfort in talking with and accepting guidance and directions from a range of familiar adults.
	Knowledge of Families and Communities	<ul style="list-style-type: none"> • Develops ability to identify personal characteristics including gender and family composition.
Approaches to Learning	Initiative and Curiosity	<ul style="list-style-type: none"> • Chooses to participate in an increasing variety of tasks and activities.
	Engagement and Persistence	<ul style="list-style-type: none"> • Grows in abilities to persist in and complete a variety of tasks, activities, projects, and experiences.
	Reasoning and Problem Solving	<ul style="list-style-type: none"> • Develops increasing ability to find more than one solution to a question, task, or problem.
Physical Health and Development	Gross Motor Skills	<ul style="list-style-type: none"> • Shows increasing levels of proficiency, control and balance in walking, climbing, running, jumping, hopping, skipping, marching, and galloping.
	Fine Motor Skills	<ul style="list-style-type: none"> • Develops growing strength, dexterity, and control needed to use tools such as scissors, paper punch, stapler, and hammer.
	Health Status and Practices	<ul style="list-style-type: none"> • Progresses in physical growth, strength, stamina, and flexibility.

In 2002, the federal government launched the *Good Start, Grow Smart* early childhood initiative, which included a new accountability system for Head Start. This new system is called the National Reporting System, which allows Head Start programs to compile performance data and report it annually to the Head Start Bureau. The National Reporting System was first used in Fall 2003 to assess 4- and 5-year-olds enrolled in Head Start. Part of the information assessed by this system is the measures in bold above.

Comparable Programs

Program directors stated that the Governor’s Pre-K program provides some competition to their programs, but due to the waiting lists, attendance in the programs has not dropped. Other than this program, no competing programs have been mentioned.

Senior Nutrition

The Senior Nutrition program is authorized under Title IIIC of the U.S. Administration on Aging’s Elderly Nutrition Program. The program provides nutritious meals in a congregate or home setting. Title IIIC1 refers to congregate meals, and Title IIIC2 refers to home-delivered meals. The program also includes Title IIIE Family Care Giver home-delivered meals, Options home-delivered, and Medicaid Waiver home-delivered meals. In Tennessee, the nutrition program is funded through the Tennessee Commission on Aging and Disability and the nine Area Agencies on Aging and Disability (AAADs). The human resource agencies contract with AAADs to provide the meals.

Table 18
Senior Nutrition
2006 Program Dollars

Human Resource Agency	Service Area Counties	Program Dollars
East Tennessee	Anderson, Blount, Campbell, Claiborne, Cocke, Grainger, Hamblen, Jefferson, Knox, Loudon, Monroe, Morgan, Roane, Scott, Sevier, Union	\$521,430
First Tennessee	Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, Washington	\$718,153
Mid-Cumberland	Cheatham, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, Wilson	\$205,394
Northwest Tennessee	Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake Obion, Weakley	\$685,207
South Central Tennessee *	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne	\$1,038,290
Southwest Tennessee	Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Madison, McNairy	\$704,559
Upper Cumberland	Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, White	\$684,664

Source: agency annual reports and audited financial statements.

* This agency, due to budget constraints, requested and was approved by the Tennessee Commission on Aging and Disability (TCAD) to reduce its congregate meal program to four days a week during April, May, and June of 2006. TCAD said it would not approve the change again. SCHRA resumed a five-day-a-week program in July 2006.

Eligibility Determination

Under Title III Grants to State and Community Programs on Aging, a participant must be 60 years or older, regardless of income. In addition, other eligible groups include the spouse of an eligible senior, regardless of age; disabled individuals under age 60 who live in facilities where congregate meals are served, or who accompany seniors to meal sites; and program volunteers.

Access to Services

Clients access the program by contacting the local AAAD in their respective regions. Service coordinators from the AAAD carry out home visits, perform assessments, and sign up clients for the home-delivery program and other services they may be eligible for. If there is no space available in the home-delivery program, names are placed on a waiting list. Upper Cumberland Human Resource Agency has a waiting list of over 400 while Mid-Cumberland has a waiting list of over 200. (See Observation and Comment on page 41.)

Clients preferring congregate meals sign up at the congregate sites throughout the counties, which are usually senior centers. Basic Client Information sheets are completed for potential clients at the congregate sites to see if they qualify for other services.

Case Management

The Area Agencies on Aging and Disability (AAADs) are responsible for case management of the Senior Nutrition program. The Tennessee Commission on Aging and Disability instituted this change after the State of Tennessee received a federal waiver from Medicaid for home-based services. At that point, the AAADs began client assessments for all in-home services, including home-delivered meals, rather than the HRAs. According to human resource agency staff, the commission believes it is more cost-efficient to have one person screening potential clients for all programs at one time. The AAADs use the Social Assistance Management System (SAMS) database containing case management and client information. The human resource agencies have access to this database in order to help them administer the nutrition program.

Other Programs

Delta Human Resource Agency does not provide meals in a congregate or home setting (senior nutrition), but it does provide a commodities program. Through the commodities program, Delta HRA distributes food on a first-come, first-served basis to those clients whose eligibility is proven by current participation in the following programs: Food Stamps, Families First, Supplemental Security Income (SSI), public housing, the Low Income Home Energy

Assistance Program (LIHEAP), or completion of a signed, self-declaration income statement showing the total amount of household income below 150% of current income poverty guidelines.

Client Files and Monitoring

We reviewed 179 client files at the seven human resource agencies that offer senior nutrition services. Based on data in SAMS and the files, we concluded that the agencies had documentation that clients met eligibility requirements for the program. Monitors from the local Area Agencies on Aging and Disability review the nutrition programs. We reviewed the most recent reports for monitoring performed from April 2005 to June 2006. Three agencies had recommendations. The monitors recommended that Northwest Tennessee Human Resource Agency have written policies to (1) assure that the provider complies with the Americans with Disabilities Act; (2) assure that an adequate backup system is in place to ensure community services; and (3) adopt methods and procedures for the collection and reporting of specific enrollee data. The South Central Tennessee Human Resource Agency had two recommendations: (1) submit Title III monthly reports timely and (2) increase “hands-on” training of staff at meal sites. The second recommendation was made because 5 of 21 meal sites visited had recommendations for improvement, which was an increase from the prior year for those meal sites. Upper Cumberland Human Resource Agency had six findings:

- (1) Outreach activity is encouraged; activities should be recorded and kept on file in the service provider’s office.
- (2) Sodium levels need to be monitored.
- (3) Manual should be updated; fruit and vegetable serving numbers have changed.
- (4) Manual should be updated; bread serving numbers have changed.
- (5) Shelf-stable meals should be replenished every six months so that expiration dates do not pass.
- (6) Frozen meals should be monitored to ensure nutrition compliance.

FOLLOW-UP OF PRIOR AUDIT FINDINGS

The 2001 audit of the human resource agencies and community action agencies had three findings related to the nine human resource agencies. Those findings have been resolved or partially resolved as summarized below.

Tripartite Board Structure

Five human resource agencies—Delta, South Central Tennessee, Southeast Tennessee, Southwest Tennessee, and Upper Cumberland—did not have tripartite board structures at the time of the prior audit. In the tripartite board structure required by federal Community Services Block Grant legislation (CSBG) for public nonprofit organizations that receive CSBG funding, at least one-third of board members must be low-income individuals served by the organization's programs. Since that audit, the five human resource agencies have amended their bylaws and changed board membership so that one-third of the board members are representatives of the low-income individuals served by the agencies.

Fragmented Client Monitoring Systems

The prior audit found that the agencies were using manual paper filing systems to record client information and recommended that the agencies develop client-monitoring systems that track clients across all programs. We found that paper filing systems are still used in the agency programs. However, clients of the aging programs are tracked using the Social Assistance Management System (SAMS) database. The SAMS system is a web-based interactive database that contains all pertinent personal information on clients served by the various aging programs at the human resource agencies. This includes not only name and address, but income level, disabilities, and programs in which each client participates. This database is used by both the agencies and the local Area Agency on Aging and Disability with which the HRAs contract for aging programs.

Another software program used to track clients has been developed by THO Software Systems under contract with the Tennessee Department of Human Services (DHS), Community Services Division. The HRAs contract with DHS for several programs including the Child and Adult Food Program and the Low-Income Home Energy Assistance Program. THO Software Systems developed the Client Information Systems (CIS) to provide a method of tracking client data for specific programs. The software uses a common intake system to gather client household information (income, family members, sex, race, etc.). Web-based technology is used to access the data from a secure server at a remote location using log-ins that are password protected. Upper Cumberland HRA, the pilot agency for CIS, began using the program to track CSBG services in 2005. Other programs included by 2006 were Information and Referral, Emergency Food and Shelter, Homemaker Services, the Weatherization Assistance Program, the Low Income Home Energy Assistance Program, Job Access, Commodity Intake and Inventory, and the Individual Development Account. The software collects client characteristics and

statistical data and tracks client services through multiple modules for reporting purposes. Upper Cumberland HRA estimates that it is 50% toward the goal of using the database agency-wide. Reports can be printed for use with the National Performance Indicators.

Strategic Plans

The prior audit recommended that the human resource agencies develop agency-wide strategic plans. We found that four of nine human resource agencies had developed a plan and the remaining HRA plans were in process. In addition, as a whole, the nine agencies have contracted with a consultant to develop a strategic plan that would include strategic planning for all nine human resource agencies and their programs.

OBSERVATIONS AND COMMENTS

The topics discussed below did not warrant a finding but are included in this report because of their effect on the operations of the human resource agencies and on the citizens of Tennessee.

MID-CUMBERLAND HUMAN RESOURCE AGENCY IS IMPLEMENTING TDOT'S TRANSPORTATION MANAGEMENT SYSTEM

Eight of the nine human resource agencies (HRAs) have transportation programs (see page 13 for description of programs). The individual agencies employ drivers and own vans that are used for all the transportation programs each agency provides. The agencies have from 48 to 100 vans and from 34 to 117 employed van drivers. Several factors complicate the HRAs' transportation services. First, the transportation clients include:

- recurring customers with a pick-up and destination address at the same time and day each week,
- customers with last-minute requests for medical transportation services, and
- customers with disabilities who are unable to use the fixed-route system.

The agencies have service areas that cover several counties (as few as 3 and as many as 16) and square miles (as few as 2,674 and as many as 6,563). Also, agencies experience van mechanical problems and drivers taking sick leave when needed. Consequently, with a limited number of vans and drivers, last-minute requests for transportation, van mechanical problems, driver illnesses, etc., can interrupt or delay services for clients. In addition to causing interruptions and delays for clients, the transportation programs do not operate efficiently if a van must be dispatched from one county in a service area to a county in the service area that is not a contiguous county. Another factor is the type of vans the agency owns. Some vans can accommodate more passengers than others, and some vans can accommodate wheelchairs. Therefore, each trip request must be matched to the proper van.

The Tennessee Department of Transportation has contracted for a new transportation management system using logistics technology that includes onboard computers, a global positioning system, and software for routing. This system is projected by TDOT to reduce customer complaints (see page 17 for information on the types of complaints the agencies receive), agency costs, and operating inefficiencies.

RouteMatch Software, Inc., was awarded a contract in November 2006 by the Tennessee Department of Transportation for a statewide Intelligent Transport System (ITS) initiative. The contract services include routing, scheduling, and dispatching software; automated vehicle

location technology and support; and improved service through transportation coordination. An automated tracking system can locate vans and route clients with the least disruption to schedules.

Mid-Cumberland HRA will be the first to implement the new system. The other human resource agencies will begin implementation at a later date.

Tennessee Association of Human Resource Agencies Board of Directors' comment:

Four agencies—East Tennessee, Northwest, Southeast, and Upper Cumberland—are currently in the process of implementing the Tennessee Department of Transportation's Information System. The four remaining agencies will follow implementation in the very near future (approximately every 30 days per agency).

THE TRANSPORTATION PROGRAMS LACK SPECIFIC GUIDELINES FOR ELIGIBILITY AND ATTENDANCE DOCUMENTATION FOR THE FAMILIES FIRST AND JOB ACCESS TRANSPORTATION PROGRAMS

Adequately documenting client eligibility and attendance better enables agencies to allocate resources and ensure they are only serving appropriate clients. Our file reviews of two transportation programs—Families First and Job Access—found that the human resource agencies do not have some essential client documentation. Although there do not appear to be specific guidelines requiring service providers (human resource agencies) to maintain eligibility and attendance records, good business practices would require that, at a minimum, the attendance of clients at jobs or training be maintained.

Families First Transportation Program

Families First transportation clients are referred to the human resource agencies by their Department of Human Services caseworker. A signed referral form, sent to the agency, indicates whether the client is riding a van or receiving a reimbursement for use of a personal vehicle. The referral forms are kept in the client's file.

Families First transportation programs are governed by an interdepartmental agreement between the Tennessee Department of Human Services (DHS) and the Tennessee Department of Transportation (TDOT). The interdepartmental agreement names TDOT as the Grantee and DHS as the Grantor State Agency. TDOT's responsibilities include

1. terminating transportation assistance when a Families First participant becomes non-compliant with the Personal Responsibility Plan,
2. requiring service providers to submit weekly attendance records for the purpose of calculating the reimbursement amount,
3. requiring employed Families First participants to submit work schedules or pay stubs to document employment, and

4. requiring service providers to notify it of participant “no shows” and then reporting this noncompliance to DHS because Families First policy requires participants to maintain an attendance rate of 90% in work and/or training components.

As the service providers, the human resource agencies are responsible for keeping track of client attendance and should have a work schedule along with the referral from the DHS case manager in a client’s file. When we reviewed client files at each agency, we found a number of client files without a work schedule (see Table 19).

Table 19
Families First Transportation Program
Client File Review

HRA	Total Files Reviewed	Work Schedule Included
Delta	73	62
East Tennessee	23	3
First Tennessee	45	0
Mid-Cumberland	0	N/A
Northwest Tennessee	38	21
Southwest Tennessee	N/A*	N/A
Southeast Tennessee	20	14
Upper Cumberland	9	6
Total Number	208	106

*This agency does not keep client information for this program, only manifests.

When we asked agency transportation program staff about the lack of documentation, they felt that all they were required to have was the DHS referral.

Interpretation of Needed Documentation According to TDOT and DHS

We asked the TDOT program manager for the Rural Transportation Program about the lack of work schedules and other documentation in client files. According to her, DHS Families First area managers vary in their policies for record keeping and eligibility verification responsibilities. Some area managers provide attendance records and schedules, while others only send the referral. In addition, we were told that the agencies are not responsible for ensuring compliance with the Personal Responsibility Plans.

We asked DHS Families First management about the level of documentation required at the agency level and were told that the only item required is the referral from the case worker.

The program manager for Families First informed us that there had not been a clear policy on transportation client no-shows. The program manager instituted a policy (effective April 1, 2006) regarding Families First client no-shows and distributed it to the agencies during the course of our audit.

Job Access Transportation

The Job Access program provides work transportation for low-income individuals, including clients who have completed the Families First program. Human resource agencies provide this service under contracts with the Tennessee Department of Transportation. The contracts do not specifically state what documentation should be kept for each client in the program. Federal regulations provide no guidance on this topic. The same can be said for the contracts between TDOT and the HRAs. This lack of specific guidelines creates confusion and concern over how the agencies should document client eligibility.

When we reviewed client files, we found inconsistency among the human resource agencies about the level of documentation required in a client’s file. Some agencies had pay stubs and/or work schedules, while others had a notation of the place of employment and the level of pay for the client (self-declared). See Table 20.

Table 20
Job Access Transportation Program
Client File Review

HRA	Total Files Reviewed	Included Proof of Income	Employer Was Listed
Delta	15	12	15
East Tennessee	12	0	12
First Tennessee	5	1	5
Mid Cumberland	5	5	5
Northwest Tennessee	20	20*	20
Southwest Tennessee	25	0	25
Southeast Tennessee	14	4	13
Upper Cumberland	12	12	12
Total Number	108	54	107

*Checked for listed income at this agency.

Tennessee Association of Human Resource Agencies Board of Directors’ comment:

All agencies operating the Job Access Transportation Program shall meet with the Best Practices Committee and work with the Tennessee Department of Transportation to set specific guidelines for eligibility and attendance.

HUMAN RESOURCE AGENCIES HAVE WAITING LISTS FOR THE SENIOR NUTRITION PROGRAM

The Senior Nutrition Program includes home-delivered and congregate meals funded under the Older Americans Act (OAA). The number of older Americans, particularly the functionally impaired, has been steadily increasing during a time in which funding for OAA programs has not. Nationally, the Administration on Aging reports that 41 percent of nutrition programs have a waiting list for potential participants in the home-delivered meal program.

Program Benefits for Seniors

The program provides nutritionally well-balanced meals five days a week to individuals or families that are elderly or physically disabled and have difficulty leaving home (Title III C-2), and four or five days a week at the congregate meal sites (Title III C1). The meals must provide recipients with at least one-third of their daily recommended dietary allowances and are cooked to take into account special senior nutrition considerations (such as low-fat, low-sodium diets).

In addition to the nutritional aspects, the program has other benefits for the clients. For instance, the congregate sites provide seniors with social interaction and stimulation, and the chance to get involved in the community. Home-delivered meals provide social interaction with a volunteer that the senior might not otherwise have. Additionally, during a meal delivery the volunteers are able to monitor the health of the seniors who have difficulty leaving home and make sure that they are getting the help they need.

Funding

Federal funding accounts for less than half of the program—about 44 percent of congregate meal funds and 30 percent of home-delivered meal funds. The remainder of the funding comes from state, county, and city sources, and from non-profit organizations and volunteer support. According to the president of the Tennessee Association of Human Resource Agencies (TAHRA), it costs \$1,600 per person per year for 5 days for home-delivered meals (260 days per year).

Human Resource Agencies' Waiting Lists and Placement

In March 2007, agencies reported waiting lists totaling 1,574. See Table 21.

Table 21
Senior Nutrition Waiting Lists
March 2007

Human Resource Agency	Number
First Tennessee	494
Mid-Cumberland	213
Northwest Tennessee	238
South Central Tennessee	200
Upper Cumberland	429
Total	1,574

A local Agency on Aging and Disability assesses and places seniors on a waiting list. After seniors are assessed, they are given a priority number. Seniors with the highest priority are placed on the meal program as an opening becomes available. The human resource agencies are responsible for the preparation, quality, and delivery of the meals. A client that is on the meal program will continue to stay on the program until his or her situation changes. According to the agencies, the large number on the waiting list can be attributed to the growing number in the elderly population and the continued lack of funding.

National Waiting List Statistics

Nationally, senior nutrition programs report the average number of elders on a waiting list is 85. The average length of time on the waiting list is between two and three months. Waiting lists are less common for congregate meal programs.

Waiting lists for home-delivered meal services were more prevalent in urban than rural programs. For example, one-half of urban programs reported a waiting list for home-delivered meal services, compared with one-third of rural programs. Rural programs were more likely to maintain waiting lists for congregate services than urban programs.

The human resource agencies were not able to provide information on the length of time between assessment and service for their programs.

The inability to receive the home-delivered meals can negatively affect a senior's likelihood to continue to live at home, quality of life, health, and the burden on family members and other caregivers.

Tennessee Association of Human Resource Agencies Board of Directors' comment:

All agencies have waiting lists for the Senior Nutrition Program. We shall continue to seek additional funding to provide services to the elderly and disabled.

THE HUMAN RESOURCE AGENCIES NEED TO ADOPT A UNIFORM SYSTEM FOR TRACKING COMPLAINTS REGARDING THE TRANSPORTATION PROGRAM

We reviewed complaint files for the transportation programs because these programs involve public safety, which is an area of high risk. Typically, complaints are in the form of phone calls from unsatisfied clients. Some human resource agencies (HRAs) had hundreds of complaint files, while others had none readily available for review. There are three reasons for this. One agency was unable to find complaints, some agencies did not keep them organized together, and some agencies did not consistently document them formally. Mid-Cumberland and First Tennessee HRAs had complaints organized by case and incident. East Tennessee HRA had them mixed together in no particular order, with only handwritten notes as documentation for some complaints. Most complaints were related to scheduling problems regarding late pickups and missed appointments. However, some were more serious, such as clients being injured in transit. There were other, much more isolated complaints that were related to poor client hygiene and alleged inappropriate conduct by a driver. Any significant documented complaints were reviewed and discussed with agency management.

There has been no consistent complaint-handling procedure across all agencies. The agencies do not appear to have had specified time frames to respond to and resolve complaints. Thus, the agencies' ability to track complaints, ensure appropriate and timely resolution, and identify any trends with complaints was limited. The following are examples of inconsistencies across the agencies in regard to their policies:

The operations manual for the Upper Cumberland Area Regional Transit System (operated by the Upper Cumberland HRA) did not include a formalized complaint procedure. However, documented complaints we reviewed appear to have been adequately addressed.

Mid-Cumberland HRA's transportation complaint policy states that passengers with complaints should call the local county office, which will document and forward the information to the supervisor.

First Tennessee HRA's *Personnel Policy Manual* did not include a statement regarding customer complaints. However, the agency had documented complaints, which appeared to be adequately addressed. These were discussed with agency management.

East Tennessee HRA had many documented complaints, but they were not orderly or well documented. Some complaint files consisted of sticky notes inside a manila folder with no other documentation. Also, for most complaints, it was not clear what corrective action had been taken. Complaints at this agency are handled by the safety officer, according to agency staff, although no timeline for complaint resolution was mentioned.

Southwest Tennessee HRA handles complaints deemed to have merit, and they are placed in the driver's file. In the Southwest Tennessee policy manual, the first step in the grievance procedure is "Try to resolve problems with the Transportation Area Coordinator." No specific timelines or documentation requirements are mentioned.

Staff at Delta HRA stated that the agency places complaints in driver personnel files, but agency staff was unable to find any complaints at the time of our review. Its transportation manual contains similar language to Southwest's manual. No specific timelines or documentation requirements are mentioned.

In 2006, the TDOT Office of Public Transportation issued a transportation manual template that could be adopted by rural transportation providers. This manual includes a customer complaint procedure:

Customers will be given the opportunity to file a complaint with [the Agency] if they feel treatment has been unfair. The agency will follow the following procedure:

1. Complaints must be made in writing to the Transportation Program Director.
2. The Director will investigate all complaints within five working days and respond in writing to the client.
3. If the client is not satisfied with the resolution of the complaint, they may request a meeting with the Transportation Director, the Center Director, Area Agency on Aging, and the Office of Public Transportation.
4. All documentation will be copied to:
 - a. The person filing the complaint
 - b. The Center Director
 - c. All parties involved in the procedure
 - d. Program files.

As of June 27, 2006, before the time of our review, Southeast Tennessee HRA had adopted TDOT's transportation manual, including the complaint procedure, verbatim.

A lack of consistent complaint-handling procedures weakens the agency's ability to deal with customer complaints or identify problem trends. The adoption of TDOT's manual should assist in improving complaint handling.

Tennessee Association of Human Resource Agencies Board of Directors' comment:

Human Resource Agencies have adopted guidelines as outlined in the Tennessee Department of Transportation's manual dated March 2007, for tracking complaints regarding the Transportation Program.

FINDINGS AND RECOMMENDATIONS

1. South Central Tennessee Human Resource Agency’s Head Start program files did not contain required enrollee documents

Finding

The Head Start program requires documentation regarding physicals, immunization records, home visits, and vision and dental screenings prior to enrollment. Our review of enrollee files at the South Central Tennessee Human Resource Agency found that some of these files were missing necessary information. (See Table 22.)

Head Start policies codified in Federal Regulations require agencies administering the program to maintain for each child:

- documentation from a health care professional that the child is up-to-date on a schedule of age-appropriate preventive and primary health care including medical, dental, and mental health;
- procedures to track the provision of health care services; and
- documentation that the agency has performed or obtained linguistically and age-appropriate screening procedures to identify concerns regarding a child’s developmental, sensory (visual and auditory), behavioral, motor, language, social, cognitive, perceptual, and emotional skills.

Based on our assessment, South Central Tennessee Human Resource Agency attempts to get health, dental, and vision screenings; speech and mental health assessments; and home visits for each enrollee but is not always successful. We reviewed a total of 36 enrollee paper files. See Table 22 for information on missing documents. Some files were missing more than one document.

**Table 22
Documentation Not Found in Enrollee Files
South Central Tennessee HRA Head Start Program**

Document	Files Without	Percentage Without
Health Screens	1	2.8%
Vision Screens	9	25%
Development Assessments	16	44.4%
Speech Record	10	27.8%
Mental Health Screen	19	52.8%
Home Visits	7	19.4%

Immunization Record	7	19.4%
Hearing Screen	8	22.2%
Dental Screenings	2	5.6%

We reviewed a computer database that tracks the information for each enrollee. That database indicated that the missing documentation had been received by the agency. Program management did not know why the documentation was missing from the paper files but noted as received in the database. Program management said that the documentation should be in the enrollee paper files. We asked agency staff responsible for the maintenance of paper files, and we were told that it was up to staff at the Head Start centers across the service area to ensure that complete information was kept in a child’s file.

The Health and Nutrition coordinator does not perform formalized checks of records in the field to ensure documentation is properly kept. Reviewing files could help ensure that files are complete.

Except for noted discrepancies between the database and the paper files, the controls over the database that stores enrollee records seem adequate, based on interviews with South Central HRA Head Start staff. According to Head Start MIS staff, any changes made to a child’s information on the database can be tracked, including who made the change, when it was made, and what was changed. Also, only one person at the South Central HRA main office is allowed to change or assign passwords.

Additionally, Head Start staff at this agency, and other agencies, reported that it can be a challenge to always get the required documentation. There is an element of parental responsibility associated with obtaining some health screenings, which can add to the difficulty of obtaining complete information for a child. Reasons for this include inadequate family transportation and family reluctance to be open with doctors or Head Start staff, which could lead them to fail to complete necessary referrals. Regardless of this, the responsibility for the maintenance of children’s records and gathering of appropriate information ultimately falls on the Head Start program staff.

Inadequate documentation of children’s records could have a number of negative effects, including children not receiving needed services to prepare them for school and the potential loss of federal funding for being out of compliance with Head Start regulations. In addition, at a May 2005 policy council meeting, regional Head Start staff implied there could be penalties in the form of a funding cut if deficiencies were not corrected. Head Start Regulations help substantiate this claim:

If an Early Head Start or Head Start grantee fails to correct a deficiency, either immediately, or within the timeframe specified in the approved Quality Improvement Plan, the responsible HHS official will issue a letter of termination or denial of refunding.

Recommendation

South Central Tennessee Head Start staff should ensure that accurate documentation consistent with federal Head Start Policy is kept for each child in the program. The development of a formalized tool to use in internal program assessment could help maintain the integrity of enrolled children's paper documentation. This could help prevent potential loss of program funding.

Management's Comment

South Central Tennessee Human Resource Agency:

We concur with the finding and offer the following response: Prior to enrollment in the Head Start/Early Head Start program, children are required to have current physicals and up-to-date immunization records. The State of Tennessee's requirements for child care centers is that these be provided prior to a child entering a child care facility. This is more stringent than Head Start/Early Head Start guidelines which require this take place within 45 days. Head Start/Early Head Start Performance Standards state that the program must follow the most stringent governing authority, so in the instance of immunizations and physicals, the State of Tennessee's guidelines are followed. After enrollment, it is the program's goal to provide screenings in the area of dental, vision, hearing, and mental health, as well as developmental assessments and home visits.

As stated in the audit, a computer database is used to track services provided to children and families. In order for information to be entered into the database, a physical or screening must be available with documentation of screening scores. It is our belief that the screenings were completed, entered into the database, but at the time of the audit, the documentation was not filed in the proper folder. There are also instances where children drop from the program prior to completing all necessary screenings. When this occurs, staff members attempt to continue communication with families, but invariably the information is not available.

In order to monitor this situation, the following tools are in place:

Children are not allowed to enter the program without an up-to-date immunization record and current physical.

The Health/Nutrition Coordinator monitors center health files three times per year.

Developmental and Mental Health Assessments are monitored on a quarterly basis in the centers by the Special Services Specialist.

Speech records will only be present if there is a Speech and/or Language issue identified. In the event that there is an issue found during a screening, documentation of services

would be maintained in the center files and monitored by the Special Services Specialist at least quarterly.

Home Visits are monitored by Site Managers and Education Specialists to ensure that teachers are making the required two home visits per program year. Family Service Specialists monitor attendance to ensure that contact is made with families when children are chronically absent without notification of the center staff. Home Visits may be attempted if center staff are unable to contact families regarding attendance issues.

Center staff members have received written procedures regarding the completion of screenings in an appropriate timeframe and the filing of documentation in appropriate folders.

Monitoring tools are used in order to ensure accurate documentation is gathered and managed appropriately. In addition to the individual monitoring tool used by Program Specialists, a Self-Assessment is conducted annually. The Self-Assessment encompasses every area of the program through observation, interview, and documentation review. Team members from throughout the program and agency participate over a three-month period. They observe in classrooms and centers, interview staff and parents, and review documentation in files. Once this assessment is complete, data is compiled and analyzed to target areas in need of improvement. An Improvement Plan with timelines and assigned responsibilities is created to address any issues that were identified by the Self-Assessment Teams.

While it is true that in May 2005 deficiencies were present and in need of correction, these deficiencies were from the September 2004 review in which the program was found to be in great need of change. These reviews are conducted every three years by a team of Federal and non-Federal members using a Program Review Instrument for Systems Monitoring (PRISM). The Head Start/Early Head Start program underwent a comprehensive PRISM review by the Administration for Children and Families (ACF) in April 2007 and only one minor finding was cited. The team reviewed documentation and visited centers for observation and file review purposes. The minor finding was in the fiscal area regarding outdated building appraisals. These are currently being completed to bring them all up to date. No other findings were cited, so the program is confident that any issues found during this review have been corrected and/or addressed.

2. **Several agencies did not offer Hepatitis B vaccines to their van drivers or did not document the offers, in violation of federal Occupational Safety and Health Administration (OSHA) regulations**

Finding

The Section 5311 Rural Transportation contracts between the Tennessee Department of Transportation and the human resource agencies state that in order to remain in compliance with OSHA (Occupational Safety and Health Administration) regulations, Hepatitis B vaccinations must be offered to all transportation program drivers. Clause A.8 states, “In compliance with OSHA regulations, the Grantee must make accessibility to Hepatitis B vaccinations available to all transportation drivers employed by the Grantee.”

OSHA requires employers to offer Hepatitis B vaccines to employees. A form acknowledging that it has been offered but declined is also required. OSHA requires language on the form to be similar to the following:

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

While OSHA only requires a form if the employee declines receiving the vaccine, the agencies have all employees sign a form stating either that they want the vaccine or that they do not. This way, they document that the vaccine was offered.

We checked employee files for sheets indicating that they had been offered this vaccine. We did not check to see if they chose to take it, only that it was offered. There were four agencies with employee files missing these offers. The information regarding these agencies is presented below.

Table 23
Files Without Evidence of Hepatitis B Vaccine Offer

Human Resource Agency	Number Reviewed	Missing
Delta (1)	10	10
First Tennessee (2)	43	35
Mid-Cumberland (3)	11	2
Southwest Tennessee (4)	11	11

- (1) We brought the lack of offers to the attention of Delta HRA’s administration in August 2006. Agency management said vaccines had not been offered for a period of time but that the agency would develop a policy regarding the vaccination offer. In March 2007, the agency sent evidence that a policy had been developed but was awaiting agency board approval.
- (2) The transportation director for First Tennessee HRA stated that the vaccines were not consistently offered before 2005.
- (3) At Mid-Cumberland, the individuals who were missing evidence of being offered the vaccine were hired under previous transportation directors. According to our review, the current director consistently offers the vaccines to new hires.
- (4) We were unable to find these in Southwest Tennessee HRA’s files we reviewed in July 2006. However, we did receive a blank declination form from the current transportation director. According to the director, as of March 19, 2007, drivers are not required to sign the form regardless of whether they accept or decline.

Failure to offer these vaccines to employees exposes both the employees and the agency itself to potentially significant risk. If the vaccine is not offered to drivers, they could potentially contract a serious illness, resulting in reduced quality of life for them and potentially higher insurance costs for the agency. In addition, violation of OSHA regulations could result in significant financial liability for the agency in the form of fines.

Recommendation

Delta, First Tennessee, Mid-Cumberland, and Southwest Tennessee human resource agencies should ensure they have implemented a policy of offering Hepatitis B vaccines to all

transportation program drivers. In addition, they should document that the vaccine was offered, and the documentation should be filed appropriately. This could mitigate potentially serious health and financial risks to both the agency and its employees.

Managements' Comments

Delta Human Resource Agency:

We concur that we did not have documentation that we offered the Hepatitis B vaccines to our van drivers. We now have a policy in place whereby we offer the Hepatitis B vaccines to our van drivers and we are also including office staff that could be used as an emergency driver that would come in contact with clients. A form has been adapted and is being presented to all van drivers and office personnel. A contract has been signed or agreement made with each of the health departments in the three counties to administer the vaccines. Vaccines will be made available starting September 1, 2007.

First Tennessee Human Resource Agency:

We concur in part. The First Tennessee Human Resource Agency's NET Trans rural transportation program has in place a policy whereby all drivers are offered a Hepatitis B vaccine during their initial training, and during any subsequent Bloodborne Pathogen trainings. Drivers are asked to sign a waiver if they choose not to have the vaccine; however, the waiver also states that they may change their mind and have a vaccine at a later date if they so choose.

Hepatitis B vaccines are not required by all First Tennessee Human Resource Agency programs; therefore, it has not been a part of our agency's New Hire Checklist. However, we have revised the form to ensure that those programs that do require certain medically related forms must initial and date the checklist to verify either the presence of the Hepatitis B Offer Form, or mark it as Not Applicable. The form has been incorporated in the checklist as Item # 40.

Mid-Cumberland Human Resource Agency:

We concur. As noted, MCHRA does currently, and will continue to require a signed declination/acceptance form in all drivers' personnel files to document that the employee was offered the hepatitis vaccine.

Southwest Tennessee Human Resource Agency:

We concur. SWHRA will require a signed declination form in all drivers' personnel files to document that the employee chose not to take the hepatitis vaccine.

3. Several human resource agencies need to improve their current conflict-of-interest policy and procedures for board members

Finding

Several human resource agencies need to develop a formal, written policy regarding potential conflicts of interest by board members. Those agencies with policies need to ensure that the annual disclosures in their policies are obtained from board members. No statute requires written disclosure for board members; however, without a means of identifying potential conflicts of interest and discussing and resolving them before they have an impact on decisions, board members could be subject to questions concerning impartiality and independence. Documentation we reviewed during the audit did not disclose any conflicts of interest, but we believe the human resource agencies can improve current policies and procedures.

Rationale for Conflict-of-Interest Policies and Examples

Conflict-of-interest disclosures are designed to ensure that the public's interest is protected. Those who make key decisions about business operations are not always independent from other parties involved, and such interests must be disclosed to keep transactions transparent to management, the board, and the public. A conflict-of-interest policy defines what constitutes a conflict of interest and the conduct expected of board members, and the policy ensures the integrity of the service provider process. A conflict-of-interest policy should be explained to board members, examples should be provided, and annual disclosures and updates should be required.

In addition to written disclosure of financial interests, a conflict-of-interest policy communicates potential conflicts. Examples of other conflicts could be prior employment, employment of immediate family members, and other matters that may influence decisions or could give the appearance of influencing decisions. Conflict-of-interest policies and disclosures help to ensure that the HRAs are acting in the client's behalf and that board members recuse themselves as needed.

For example, a potential conflict of interest could be an HRA board member who may also serve as a board member of an agency that contracts with the HRA. A board member may have a family member who is directly involved in the licensing or certification of providers of services to HRA clients.

Current Policies and Procedures Regarding Conflicts of Interest

In April 2006, we requested all nine HRAs to provide us with their conflict-of-interest policies and disclosures for board members. We found disparities in the policies and procedures for conflicts of interest at the nine human resource agencies. Several agencies addressed conflicts of interest in employee handbooks or procurement manuals but did not have policies for

board members. Other agencies had policies but no disclosure requirements. During our audit fieldwork, several HRAs adopted a conflict-of-interest policy and/or supplemented their existing policies by adding a disclosure requirement. Therefore, during fieldwork, the agencies were not able to provide signed disclosures for all board members. See Table 24.

Recommendation

East Tennessee Human Resource Agency, First Tennessee Human Resource Agency, South Central Tennessee Human Resource Agency, and Southwest Tennessee Human Resource Agency should adopt and implement a written conflict-of-interest policy for their board members. Policies should require board members to sign and update an annual disclosure form addressing direct or indirect interest in any business, government, or organization the agency contracts with, deals with, or could deal with during the course of its activities. Mid-Cumberland Human Resource Agency should revise its current conflict-of-interest policy to include conflicts other than financial interest. It should be the responsibility of the board members at all agencies to declare conflicts of interest, and the agencies should require that board members update disclosures annually and whenever board members' circumstances change.

All nine of the human resource agencies should ensure that the board members submit disclosure statements in a timely manner and recuse themselves as warranted.

Managements' Comments

Delta Human Resource Agency:

We concur in part that we did have an approved conflict-of-interest form in place, signed and approved on May 11, 2005. All members signed at that time and to keep this up to date, we are requiring each board member to sign a new conflict-of-interest form at the first board meeting of each new fiscal year and/or at the time they come on board as a new member. Documentation will be kept in our board minutes under a special "Conflict-of-Interest" section for convenience of auditors.

East Tennessee Human Resource Agency:

We concur. At the end of the June 10, 2007, meeting, ETHRA's Policy Council finalized and adopted a Conflict of Interest Disclosure Policy. The policy went into effect as of July 1. All conflict-of-interest forms will be completed yearly and held on file.

First Tennessee Human Resource Agency:

We concur in part. The First Tennessee Human Resource Agency did not have a Conflict-of-Interest policy for board members in place prior to August 2006. At that time we instituted a policy that met three of the four criteria listed in the audit draft. We have

Table 24
Board Member Conflict-of-Interest Policies and Disclosure
Human Resource Agencies
2006

Written Policy That Does Require:	Delta (1)	East Tenn. (2)	First Tenn. (3)	Mid-Cumberland (4)	Northwest (5)	South Central (6)	Southeast (7)	Southwest (8)	Upper Cumberland (9)
Disclosure of Financial Interests	Y	N	N	Y	Y	N	Y	N	Y
Disclosure of Interests Other Than Financial	Y	N	N	N	Y	N	Y	N	Y
Examples	Y	N	N	N	Y	N	Y	N	Y
Annual Disclosure	Y	N	N	N	Y	N	N	N	N

(1) Board adopted policy in May 2006.

(2) Board attorney is drafting a policy.

(3) *Board of Directors' Manual*, Part 1, Section D, states, "To act in good faith, the reasonably prudent board member should decline to vote on transactions in which he or she has a personal financial interest" and "avoid any semblance of self-dealing or enrichment."

(4) Policy is two statements on disclosure form regarding financial interests and gifts.

(5) Board adopted policy in September 2006.

(6) *South Central HRA Procurement Regulations Manual* states, "No officer, employee, or agent or relative of officers, employees, or agent shall unlawfully benefit directly or indirectly from the procurement of materials or services" or "participate if there is a real or apparent conflict of interest."

(7) Personnel manual has a section on conflict of interest with examples, but disclosure is only required when and if board member perceives a conflict.

(8) Policy is for employees but not for board members.

(9) Disclosures were first required in August 2006, and form does not state it is an annual disclosure.

since revised that policy to include the missing element, thereby requiring that First Tennessee Human Resource Agency board members be subject to “Annual Disclosure.”

Mid-Cumberland Human Resource Agency:

We concur. Mid-Cumberland Human Resource Agency has revised its conflict-of-interest policy and disclosure statement to include conflicts other than financial interest. It is the responsibility of our board members to declare conflicts of interest and MCHRA requires board members to update disclosures annually and whenever board members’ circumstances change. The new policy and disclosure statement was adopted at the August 2007 board meeting.

Northwest Tennessee Human Resource Agency:

We concur. Our board voted a policy into place in September 2006. It is now our responsibility to keep the policy current, keep the board apprised of the policy, and issue renewal policies for our members to sign, date, and return. We will get renewals out prior to the end of August 2007.

Southeast Tennessee Human Resource Agency:

We at the Southeast Human Resource Agency concur that our current conflict-of-interest policy regarding board members can be improved, specifically in the area of annual board member conflict-of-interest disclosures.

- The Southeast Tennessee Human Resource Agency will formally amend its conflict-of-interest policy to require written disclosure statements to be submitted by each one of the board members on an annual basis.
- The agency currently requires the annual submission of conflict-of-interest statements by employees and officers. These statements are obtained as part of the annual financial audit process. The C.P.A. firm that conducts the annual audit mails conflict-of-interest disclosure statements and questionnaires to all agency officers and management personnel. (These statements and questionnaires are not limited to potential financial conflicts of interest but address all potential conflicts.) The statements and questionnaires are filled out by the individuals and returned directly to the C.P.A. firm.
- In order to improve our conflict-of-interest policy regarding annual board member disclosure, we will require our C.P.A. firm to send disclosure statements and questionnaires to each board member in addition to management team members and officers. This will be done on an annual basis in conjunction with the annual audit.

South Central Tennessee Human Resource Agency:

We concur with the finding and offer the following response: The South Central Tennessee Human Resource Agency prepared a new conflict-of-interest policy and presented it to the Personnel Committee of said agency for adoption. Following adoption by the Personnel Committee, the policy was presented to the Policy Council and Governing Board of the agency and was duly passed and adopted during regular meeting on May 1, 2007. A copy of said policy was faxed to the Division of State Audit. The policy which was passed addressed agency employees and board members. The Personnel Committee, Policy Council, and Governing Board will meet on August 7, 2007, to adopt one designed specifically for Policy Council members.

Southwest Tennessee Human Resource Agency:

We concur. Although SWHRA had a conflict-of-interest policy for employees, there was no written policy for board members. We have corrected this deficiency by developing a written policy and requiring the board members to sign an annual disclosure statement.

Upper Cumberland Human Resource Agency:

We concur in part. As noted in the audit report, the Upper Cumberland Human Resource Agency had adopted a Conflict-of-Interest Policy for Board Members disclosing financial as well as other interests with a disclosure form signed by board members and maintained on file. This process has always been followed on an annual basis and can be viewed on site; however, we have revised the disclosure form to note that this process will be conducted on an annual basis.

4. Two van drivers did not have pre-employment background checks, and another did not have a pre-employment drug screen

The human resource agencies are responsible for administering transportation programs for a diverse group of clients, including low-income, elderly, and those needing transportation to medical appointments. This requires that the agencies maintain verification that van drivers meet standards required in transportation contracts as well as federal and agency personnel standards. Our review of van driver files found that two drivers did not have the required background check and another did not have a pre-employment drug screen.

The Section 5311 Rural Transportation program contracts require the human resource agencies to conduct a criminal background check of prospective van drivers. According to the Tennessee Department of Transportation (TDOT) Rural Transportation monitor, this policy was effective May 1, 2004. Prior to that time, the human resource agencies had started to conduct the checks as part of their own internal policies. Now, as of 2006, TDOT has a transportation policy manual for the Section 5311 transportation program and has recommended that the agencies

adopt the manual. The TDOT manual includes a policy requiring a national criminal background check for van driver applicants and for each succeeding year.

The human resource agencies are required by a 1991 federal transportation law to conduct pre-employment drug screens on all applicants for safety-sensitive functions such as driving a van or bus before they can perform a safety-sensitive operation. The regulation reads:

Testing Program for Mass Transportation Employees.--(1)(A) In the interest of mass transportation safety, the Secretary shall prescribe regulations that establish a program requiring mass transportation operations that receive financial assistance under section 5307, 5309, or 5311 of this title or section 103(e)(4) \1\ of title 23 to conduct preemployment, reasonable suspicion, random, and post-accident testing of mass transportation employees responsible for safety-sensitive functions (as decided by the Secretary) for the use of a controlled substance in violation of law or a United States Government regulation . . .

The human resource agencies contract with a vendor to conduct pre-employment background checks and drug screenings. We reviewed van driver files at the agencies to determine whether drivers hired after the contract policy-effective date of May 1, 2004, had a background check and a drug screen conducted prior to hire. We also reviewed files of drivers hired prior to that date to determine if the agencies had conducted background checks and drug screens. (See Tables 25 and 26 for the results of our file review for van driver drug testing.)

Table 25
Van Driver Pre-employment Background Checks
Drivers Hired After May 1, 2004

Human Resource Agency	Number Files Reviewed	Number Missing Background Check	Number Missing Drug Screen
Delta	2	0	0
East Tennessee	14	0	0
First Tennessee	24	1	0
Mid-Cumberland	5	0	0
Northwest Tennessee	3	0	0
Southeast Tennessee	8	0	0
Southwest Tennessee	6	1*	0
Upper Cumberland	6	0	0

* In a 2005 audit of its contract, TennCare also found that this driver did not have a pre-employment background check. As part of that audit, a background check was conducted, and as a result, the audit recommended that the driver no longer transport TennCare clients. However, this driver is still allowed to transport other clients.

Table 26
Van Driver Pre-Employment Background Checks
Drivers Hired Prior to May 1, 2004

Human Resource Agency	Number Files Reviewed	Number Missing Background Check	Number Missing Drug Screen
Delta	8	0	0
East Tennessee	6	0	0
First Tennessee	19	9	0
Mid-Cumberland	6	0	0
Northwest Tennessee	7	7	1
Southeast Tennessee	3	0	0
Southwest Tennessee	5	1	0
Upper Cumberland	4	0	0

According to transportation program management at Northwest Tennessee Human Resource Agency, the driver missing evidence of a pre-employment drug screen was hired during a time previous program management did not consistently conduct the screens, but the driver had passed all random drugs screens.

Recommendation

First Tennessee and Southwest Tennessee Human Resource Agencies should ensure that van drivers have the required pre-employment background checks. Northwest Tennessee Human Resource Agency should ensure that all van drivers have the required drug screenings.

Managements' Comments

First Tennessee Human Resource Agency:

We concur. It is standard operating procedure to have a background check on all NET Trans employees, and there certainly should have been one present in the file. The files have been internally audited to ensure that all NET Trans driver personnel files contain the appropriate background checks.

Northwest Tennessee Human Resource Agency:

We concur with the finding in regard to the drug screen. The driver was hired prior to this agency doing 100% pre-employment drug screens. All drivers are now given a pre-employment drug screen. Further, the long-term driver in violation of the pre-employment drug screen has successfully been part of our random drug screen program for years.

Southwest Tennessee Human Resource Agency:

We concur. There was one driver that did not have a pre-employment background check in the file. We could not determine if this was an oversight or if the background check was just not put in the employee’s file. We follow the policies as required by TDOT and will ensure that background checks are in all driver files.

5. Some agencies did not ensure that van drivers received proper training from the Tennessee Transit Training Center

Finding

Section A.13 of the Section 5311 rural transportation contracts between TDOT and the human resource agencies states, “The Grantee shall send all transportation employees to the appropriate training workshops sponsored by the Tennessee Transit Training Center (TTTC).” These workshops include instruction on such things as conflict avoidance, passenger assistance, the use of radios, and how to transport clients in wheelchairs. Annual training helps ensure that drivers can perform their duties as safely as possible.

During our review, we checked driver files for either certificates of completion for the various training courses, or if these were not available, we requested training rosters from agency staff. The results of our review are found in Table 27.

**Table 27
Agencies With Missing Driver Training Files**

Agency	Number of Files Reviewed	Number of Missing Certificates
Delta	10	3
East Tennessee	20	0
First Tennessee	43	0
Mid-Cumberland	11	0
Northwest Tennessee	10	0
Southeast Tennessee	11	0
Southwest Tennessee	11	2
Upper Cumberland	10	0

By not ensuring that all drivers receive the appropriate training, the agencies could inadvertently reduce the safety of their transit operations. In addition, this takes the agencies out of compliance with Department of Transportation policy.

Recommendation

Delta and Southwest Tennessee human resource agencies should ensure that all van drivers have received appropriate training from the Tennessee Transit Training Center. All training should be documented in an accessible manner.

Managements' Comments

Delta Human Resource Agency:

We concur that all van drivers should attend all of the training as sponsored by the Tennessee Transit Center. We require all of our drivers to attend the two annual mandatory workshops that are held at our agency each year. We have checked our records again and found that we indeed had three drivers that missed the training session in October. In the future they will all attend unless there is a documented death or there is a documented statement from a doctor.

Southwest Tennessee Human Resource Agency:

We concur. We make concerted efforts to ensure that all drivers take appropriate training courses during the year. Efforts will be made to ensure that certificates of completion for driver training are documented in the drivers' files.

RECOMMENDATIONS

ADMINISTRATIVE

The human resource agencies should address the following areas to improve the efficiency and effectiveness of their operations.

1. South Central Tennessee Human Resource Agency should ensure that accurate documentation consistent with federal Head Start Policy is kept for each child in the program. The development of a formalized tool to use in internal program assessment could help maintain the integrity of enrolled children's paper documentation, and this could also help prevent potential loss of program funding.
2. Delta, First Tennessee, Mid-Cumberland, and Southwest Tennessee human resource agencies should ensure they have implemented a policy of offering Hepatitis B vaccines to all transportation program drivers. In addition, they should document that the vaccine was offered, and the documentation should be filed appropriately.
3. East Tennessee Human Resource Agency, First Tennessee Human Resource Agency, South Central Tennessee Human Resource Agency, and Southwest Tennessee Human Resource Agency should adopt and implement a written conflict-of-interest policy for their board members. Policies should require board members to sign and update an annual disclosure form addressing direct or indirect interest in any business, government, or organization the agency contracts with, deals with, or could deal with during the course of its activities. Mid-Cumberland Human Resource Agency should revise its current conflict-of-interest policy to include conflicts other than financial interest. It should be the responsibility of the board members at all agencies to declare conflicts of interest, and the agencies should require that board members update disclosures annually and whenever board members' circumstances change. All nine of the human resource agencies should ensure that the board members submit disclosure statements in a timely manner and recuse themselves as warranted.
4. First Tennessee and Southwest Tennessee human resource agencies should ensure that van drivers have the required pre-employment background checks. Northwest Tennessee Human Resource Agency should ensure that all van drivers have the required drug screenings.
5. Delta and Southwest Tennessee human resource agencies should ensure that all van drivers have received appropriate training from the Tennessee Transit Training Center. All training should be documented in an accessible manner.

Appendix 1
Service Areas, Programs, and Funding Amounts
FY 2006

Delta Human Resource Agency		
Executive Director	Mr. Quincy Barlow	
Location	Covington	
Counties Served	Fayette, Lauderdale, Tipton	
Programs	Child Care Program Job Access Transportation Community Services Block Grant Emergency Food and Shelter Families First Transportation Group Workcamp Low Income Home Energy Assistance Nutrition Rural Transportation USDA Commodities Weatherization Assistance Program	
Revenues FY 2006	Description	Amount
	Federal Grants	\$1,824,763
	State Grants	802,998
	State and Local Contributions	140,637
	Interest Income	43,442
	Program Income	605,461
	In-kind Revenues	133,676
	Total Revenues	\$3,550,977

East Tennessee Human Resource Agency	
Executive Director	Mr. Gordon Acuff
Location	Knoxville
Counties Served	Anderson, Blount, Campbell, Claiborne, Cocke, Grainger, Hamblen, Jefferson, Knox, Loudon, Monroe, Morgan, Roane, Scott, Sevier, Union
Programs	<p>Aging Services: Senior Nutrition Health Promotion Ombudsman Senior Centers County Office on Aging Legal Assistance Senior Games Senior Medicare Patrol</p> <p>Area Agency on Aging: Administration and Planning Options for Community Living Family Care Giver Contracted Services Public Guardian</p> <p>Family Assistance: Homemaker Family Support Commodities Emergency Management Representative Payee</p> <p>Housing and Restoration: Low Income Home Energy Assistance Weatherization HOME Rental Assistance Family Self-Sufficiency</p> <p>Correction and Probation: Community Corrections Youth Early Intervention Misdemeanor Probation Child Restraint Violence Intervention</p> <p>Transportation: Public Transportation Oak Ridge Transit Job Access Call Center Lakeway</p>

	<p>Workforce Development: Workforce Investment Families First Senior Employment</p> <p>AIDS Support Services: Ryan White Administration and Plan Ryan White Contracted Services Ryan White Dental Ryan White Insurance Ryan White Prevention Housing Opportunities for Persons with AIDS</p> <p>Child Development: Child Care Food (Centers) Child Care Food (Home) Summer Food Child Protective Services</p> <p>Mountain Valley Economic Opportunity Authority: Community Service Block Grant Jane Petway</p>	
Revenues FY 2006	Description	Amount
	Grantor Contributions	\$25,390,218
	Program Income	5,106,463
	USDA	397,400
	Assessments to Local Governments	530,963
	Career Center/Reimbursements	52,562
	Interest Income	26,219
	Other Income (includes Business Activity)	1,914,005
	Total Revenues	\$33,417,830

First Tennessee Human Resource Agency		
Executive Director	Mr. Dale Fair	
Location	Johnson City	
Counties Served	Hancock, Hawkins, Greene, Washington, Unicoi, Carter, Sullivan, Johnson	
Programs	Adopt a Rider Program Adult Day Services Program Alternative Community Corrections Program Child and Adult Care Food Program Correctional Counseling Institute Families First Transportation Program Family Services Institute Family Support Services Homemaker Program Job Access and Reverse Commute Program Minor Home Modification Program Misdemeanor Probation Program Nutrition Program for the Elderly and the Disabled Rural Public Transportation Program Youth Services Program	
Revenues FY 2006	Description	Amount
	Federal Financial Assistance	\$3,429,010
	Other Financial Assistance	1,355,261
	Local Contributions	332,632
	Program Income	2,141,640
	Other Income	133,596
	Total	\$7,392,139

Mid-Cumberland Human Resource Agency		
Executive Director	Mrs. Jane Hamrick	
Location	Nashville	
Counties Served	Cheatham, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, Wilson	
Programs	Child Care Certificate Program Community Corrections Program Families First Transportation Program Home Health Program Homemaker Program Long-Term Care Ombudsman Program Meals on Wheels/Senior Dining Minority Applicant Pool System Minor Home Modifications Misdemeanor Management Services Program Behavioral Management Classes/DUI Representative Payee Service Regional Transportation System Access to Jobs Women, Infants and Children Youth CAN-Career Action Network	
Revenues FY 2006	Description	Amount
	Federal Grants	\$3,507,149
	State Grants	3,744,627
	Local Program	944,109
	Program Income	2,559,001
	Other	731,138
	Total	\$11,486,024

Northwest Tennessee Human Resource Agency		
Executive Director	Mr. John Bucy	
Location	Martin	
Counties Served	Benton, Carroll, Crockett, Dyer, Gibson, Henry, Lake, Obion, Weakley	
Programs	Access to Jobs Congregate and Home Delivered Meals for the Elderly and Disabled Families First Transportation Homemaker Program Long-Term Care Ombudsman Retired and Senior Volunteer Program Rural Public Transportation Senior Aides Program	
Revenues FY 2006	Description	Amount
	Federal	\$2,204,040
	State	1,351,364
	Local	2,158,476
	Interest	2,037
	Total	\$5,715,917

South Central Tennessee Human Resource Agency		
Executive Director	Mr. Coy Anderson	
Location	Fayetteville	
Counties Served	Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne	
Programs	Alcohol/Drug Safety Educational Program Child Care Broker Services Community Corrections Program Community Services Block Grant Emergency Food and Shelter Program Emergency Food Assistance Program Families First Program Family Caregiver Foster Grandparent Program HCBS Waiver Head Start/Early Head Start Program Home Delivered Meals Homemaker Services for the Elderly Long-Term Care Ombudsman Program Low Income Home Energy Assistance Misdemeanor Probation Program Nutrition Services for the Elderly Options Program Retired Senior Volunteer Program Title V Senior Community Service Employment Program Transportation for the Elderly Weatherization Assistance Program Weatherization Assistance – LIHEAP Component	
Revenues FY 2006	Description	Amount
	Grantor Contributions	\$12,906,818
	State and Local Contributions	626,263
	Program Income	1,168,953
	Interest Income	26,124
	USDA Reimbursement	527,475
	Other Income	39,135
	Total	\$15,294,768

Southeast Tennessee Human Resource Agency		
Executive Director	Mr. Ray Evans	
Location	Dunlap	
Counties Served	Bradley, Bledsoe, Grundy, Marion, McMinn, Meigs, Polk, Rhea, Sequatchie	
Programs	At Risk Child Only Cedar Grove Way Apartments Child and Adult Care Food Program Child Care Certificate Child Care Teen Parent Cleveland Urban Area Transit Commodities Community Corrections Community Prevention Initiative Community Services Block Grant Crisis Intervention Families First Transportation Family Self Sufficiency FEMA Homeless Homemaker Services Housing for Homeless Recovering from Alcohol Addiction Job Access Transportation Juvenile Community Intervention Services Low Income Home Energy Assistance Minor Home Modifications Misdemeanor Probation Pharmaceutical Personal Care Services Representative Payee Rural Public Transportation Section 8 Housing Shelter Care Plus Weatherization Plus Youth Enrichment Services	
Revenues FY 2006	Description	Amount
	Grantor Contributions	\$7,719,960
	State and Local Contributions	452,902
	Performance Based Income	218,429
	Program Revenue	2,028,941
	Interest Revenue	10,067
	Contract Revenue	922,498
	Other Revenue	216,363
	Total	\$11,569,160

Southwest Tennessee Human Resource Agency		
Executive Director	Mr. Mike Smith	
Location	Henderson	
Counties Served	Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Madison, McNairy	
Programs	Childcare Certificate Program (Fayette, Lauderdale and Tipton counties only) Chore Program Congregate and Home Delivered Meals Crisis Intervention Program Foster Grandparent Head Start Hearing Aid Elderly Homeless Homemaker/Options Program Low Income Home Energy Assistance Transportation USDA Commodities Volunteer Respite Program Weatherization Assistance Program Workforce Investment	
Revenues FY 2006	Description	Amount
	Federal/State Grant Funds	\$22,820,379
	Local Contributions	1,279,541
	In-kind Contributions	1,011,704
	Other Revenue	205,875
	Total	\$25,317,499

Upper Cumberland Human Resource Agency		
Executive Director	Mrs. Phyllis Bennett	
Location	Cookeville	
Counties Served	Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, White	
Programs	Adult Community Corrections Chance Residential Center at Bloomington Springs For Girls Chance Residential Center at Indian Mound For Boys Child and Adult Care Food Program Child Care Certificate Program Community Intervention For Juvenile Offenders Court Appointed Special Advocates Driver's Education DUI School Elderly Nutrition Emergency Services Program Families First Families First Transportation Home and Community Based Waiver Home Modifications Homemaker Aide and Elderly Chore Housing Opportunities For Persons With AIDS Information and Referral Services Job Access Program Juvenile Accountability Block Grant Lakeside Resort and Educational Complex Low Income Home Energy Assistance Program National Emergency Grant Rural Commuter Program Ryan White Community AIDS Partnership Saving For Us Temporary Emergency Food Assistance Program (Commodities) Title V Senior Community Service Employment Program Upper Cumberland Area Rural Transit System Van Buren County Head Start Weatherization Assistance Program Workforce Investment Act	
Revenues FY 2006	Description	Amount
	Grantor Contributions	\$15,704,792
	Fees for Service	23,366
	State and Local Contributions	1,150,700
	USDA Reimbursements	109,363
	Contract Revenue	2,396,051
	Program Income	484,318
	Child Care Certificate	4,339,583

	Enterprise Fund	690,785
	Non Cash Assistance	515,389
	Total	\$25,414,347

Appendix 2

As discussed on page 5, the Community Services Section of the Adult and Family Services Division of the Department of Human Services collects data from all Community Service Block Grant (CSBG) agencies in the state and reports the measures and outcomes. The following tables represent the results for all CSBG agencies and for the five human resource agencies that receive CSBG funds.

Tennessee Community Services Block Grant Agencies Measures for the FY 2005 National Performance Indicators

Goal 1: Low-income people become more self sufficient.

Performance Indicator 1.1: Employment

The number and percentage of low-income participants in community action employment initiatives who get a job or become self-employed.

Measure A

Unemployed and Obtained a Job	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	15	9,035	6,139	5,552	90.4%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	1,571	550	422	77.0%
Southeast Tennessee	1	1,246	1,246	1,246	100.0%
Southwest Tennessee	1	1,464	1,300	1,145	88.0%
Upper Cumberland	1	1,100	600	633	106.0%

Measure B

Employed and Obtained an Increase in Employment Income	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	11	2,631	1,964	1,489	75.8%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	756	350	185	53.0%
Southeast Tennessee	1	560	600	560	93.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	1	50	25	47	188.0%

Goal 1 and Performance Indicator 1.1 (cont'd.)

Measure C

Achieved “Living Wage” Employment	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	8	1,985	1,198	983	82.1%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	921	290	259	89.0%
Southeast Tennessee	1	83	83	83	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 1: Low-income people become more self sufficient.

Performance Indicator 1.3: Economic Asset Enhancement and Utilization

The number and percentage of low-income households that achieve an increase in financial assets and/or financial skills as a result of community action assistance.

Enhancement 1

Number and Percent of Participants in Tax Preparation Programs Who Identify Any Type of Federal or State Tax Credit	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	7	1,443	1,433	1,433	100.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	550	550	550	100.0%
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 1 and Performance Indicator 1.3 (cont'd.)

Enhancement 2

Number and Percent Obtained Court-Ordered Child Support Payments	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	3	184	115	115	100.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	84	15	15	100.0%
Southeast Tennessee	1	81	81	81	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Enhancement 3

Number and Percent of Enrolled in Telephone Lifeline and/or Energy Discounts With the Assistance of the Agency	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	4	47	47	47	100%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 1 and Performance Indicator 1.3 (cont'd.)

Utilization 1

Number and Percent Demonstrating Ability to Complete and Maintain a Budget for Over 90 Days	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	7	1,151	691	645	93.3%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	574	187	160	85.6%
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Utilization 2

Number and Percent Opening an Individual Development Account or Other Savings Account	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	3	98	50	42	84.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	1	26	12	1	8.3%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	1	N/A	30	33	110.0%

Goal 1 and Performance Indicator 1.3 (cont'd.)

Utilization 3a

Number and Percent Capitalizing a Small Business With Accumulated Savings	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	0	0	0	0	0
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Utilization 3b

Number and Percent Pursuing Post-Secondary Education With Savings	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	1	2	2	2	100.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 1 and Performance Indicator 1.3 (cont'd.)

Utilization 3c

Number and Percent Purchasing a Home With Accumulated Savings	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	1	32	6	6	100.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 5: Agencies increase their capacity to achieve results.

Performance Indicator 5.1: Broadening the Resource Base

The number of dollars mobilized by community action, including amounts and percentages.

Measure A

Community Service Block Grant	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	20	\$12,249,015	4.8%
Delta	1	\$292,107	9.0%
South Central Tennessee	1	\$880,382	5.0%
Southeast Tennessee	1	\$404,002	4.0%
Southwest Tennessee	1	\$644,236	3.0%
Upper Cumberland	1	\$787,683	4.0%

Measure B

Non-CSBG Federal Programs	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	20	\$183,638,099	72.4%
Delta	1	\$1,454,089	47.0%
South Central Tennessee	1	\$12,833,863	72.0%
Southeast Tennessee	1	\$5,250,270	58.0%
Southwest Tennessee	1	\$20,005,217	81.0%
Upper Cumberland	1	\$11,911,210	61.0%

Measure C

State Programs	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	19	\$16,745,918	6.6%
Delta	1	\$571,825	19.0%
South Central Tennessee	1	\$553,849	3.0%
Southeast Tennessee	1	\$1,969,147	22.0%
Southwest Tennessee	1	\$882,035	4.0%
Upper Cumberland	1	\$2,874,755	15.0%

Goal 5 and Performance Indicator 5.1 (cont'd.)

Measure D

Local Public Funding	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	17	\$10,983,829	4.3%
Delta	1	\$669,804	22.0%
South Central Tennessee	1	\$43,414	0.0%
Southeast Tennessee	1	\$48,161	1.0%
Southwest Tennessee	1	\$23,935	0.0%
Upper Cumberland	1	\$2,113,075	11.0%

Measure E

Private Sources	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	20	\$20,516,703	8.1%
Delta	1	\$41,322	1.0%
South Central Tennessee	1	\$1,791,416	10.0%
Southeast Tennessee	1	\$1,291,841	14.0%
Southwest Tennessee	1	\$2,453,877	10.0%
Upper Cumberland	1	\$1,574,275	8.0%

Measure F

Value of Volunteer Time	Eligible Entities Reporting	Dollars Mobilized	Percentage of Total
All CSBG Agencies	20	\$9,446,249	3.7%
Delta	1	\$60,620	2.0%
South Central Tennessee	1	\$1,701,874	10.0%
Southeast Tennessee	1	\$50,037	1.0%
Southwest Tennessee	1	\$551,070	2.0%
Upper Cumberland	1	\$238,669	1.0%

Goal 6: Low-income people, especially vulnerable population, achieve their potential by strengthening family and other supportive environments.

Performance Indicator 6.2: Emergency Assistance

The number of low-income individuals or families served by community action that sought emergency assistance and the percentage of those households to which assistance was provided.

Measure A

Food	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	15	22,914	22,791	99.5%
Delta	1	47	47	100.0%
South Central Tennessee	N/A	N/A	N/A	N/A
Southeast Tennessee	1	27	27	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A
Upper Cumberland	1	15	15	100.0%

Goal 6 and Performance Indicator 6.2 (cont'd.)

Measure B

Emergency Vendor Payments	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	20	103,127	80,687	78.2%
Delta	1	2,321	1,811	78.0%
South Central Tennessee	1	8,648	8,648	100.0%
Southeast Tennessee	1	3,172	3,059	96.4%
Southwest Tennessee	1	1,661	1,551	93.3%
Upper Cumberland	1	7,000	5,529	78.9%

Measure C

Temporary Shelter	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	11	1,052	855	81.3%
Delta	N/A	N/A	N/A	N/A
South Central Tennessee	1	98	98	100.0%
Southeast Tennessee	1	3	3	100.0%
Southwest Tennessee	1	53	53	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A

Measure D

Emergency Medical Care	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	9	628	590	93.9%
Delta	1	1	1	100.0%
South Central Tennessee	1	7	7	100.0%
Southeast Tennessee	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A

Measure E

Protection from Violence	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	10	562	474	84.3%
Delta	N/A	N/A	N/A	N/A
South Central Tennessee	1	21	21	100.0%
Southeast Tennessee	1	8	8	100.0%
Southwest Tennessee	1	144	144	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A

Goal 6 and Performance Indicator 6.2 (cont'd.)

Measure F

Legal	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	8	858	858	100.0%
Delta	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A
Southwest Tennessee	1	8	8	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A

Measure G

Transportation	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	8	1,541	1,529	99.2%
Delta	N/A	N/A	N/A	N/A
South Central Tennessee	1	15	15	100.0%
Southeast Tennessee	N/A	N/A	N/A	N/A
Southwest Tennessee	1	30	30	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A

Measure H

Disaster Relief	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	2	37	37	100.0%
Delta	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A

Measure I

Clothing	Eligible Entities Reporting	Number Seeking Assistance (Target)	Number Receiving Assistance	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	10	1,488	1,488	100.0%
Delta	1	9	9	100.0%
South Central Tennessee	1	45	45	100.0%
Southeast Tennessee	1	45	45	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A

Goal 6: Low-income people, especially vulnerable population, achieve their potential by strengthening family and other supportive environments.

Performance Indicator 6.3: Emergency Assistance

The number and percentage of all infants, children, youth, parents, and other adults participating in developmental or enrichment programs that achieve program goals, as measured by one or more of the following:

Infant and Child Measure 1

Infants and children obtain age appropriate immunizations, medical and dental care	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	15	15,623	16,113	15,497	96.2%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	1,017	1,017	1,017	100.0%
Southeast Tennessee	1	569	1,143	569	50.0%
Southwest Tennessee	1	605	605	605	100.0%
Upper Cumberland	1	1,144	1,144	1,144	100.0%

Infant and Child Measure 2

Infant and child health and physical development are improved as a result of adequate nutrition	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	16	32,726	30,554	32,642	106.8%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	1,017	1,017	1,017	100.0%
Southeast Tennessee	1	4,218	2,130	4,218	198.0%
Southwest Tennessee	1	605	605	605	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 6 and Performance Indicator 6.3 (cont'd.)

Infant and Child Measure 3

Children participate in pre-school activities to develop school readiness skills	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	14	12,387	12,387	12,387	100.0%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	957	957	957	100.0%
Southeast Tennessee	1	25	25	25	100.0%
Southwest Tennessee	1	605	605	605	100.0%
Upper Cumberland	1	1,144	1,144	1,144	100.0%

Infant and Child Measure 4

Children who participate in pre-school activities are developmentally ready to enter kindergarten or first grade	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	13	8,669	8,539	7,787	91.2%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	368	368	300	82.0%
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	1	605	605	605	100.0%
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Goal 6 and Performance Indicator 6.3 (cont'd.)

Youth Measure 1

Youth improve physical health and development	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	6	4,911	3,749	3,851	102.7%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	N/A	N/A	N/A	N/A	N/A
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Youth Measure 2

Youth improve social/emotional development	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	9	6,804	5,934	4,660	78.5%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	1	50	50	50	100.0%
Southwest Tennessee	1	600	600	600	100.0%
Upper Cumberland	1	208	208	164	79.0%

Goal 6 and Performance Indicator 6.3 (cont'd.)

Youth Measure 3

Youth avoid risk-taking behavior for a period of time	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	8	2,471	1,528	1,455	95.2%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	1	50	50	50	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	1	107	107	107	100.0%

Youth Measure 4

Youth have reduced involvement with criminal justice system	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	8	2,511	1,474	1,375	93.3%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	1	50	50	50	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	1	107	107	107	100.0%

Goal 6 and Performance Indicator 6.3 (cont'd.)

Youth Measure 5

Youth increase academic, athletic, or social skills for school success by participating in before- or after-school programs	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	7	4,856	3,011	2,927	97.2%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	N/A	N/A	N/A	N/A	N/A
Southeast Tennessee	1	267	267	267	100.0%
Southwest Tennessee	N/A	N/A	N/A	N/A	N/A
Upper Cumberland	N/A	N/A	N/A	N/A	N/A

Adult Measure 1

Parents and other adults learn and exhibit improved parenting skills	Eligible Entities Reporting	Number of Participants Enrolled in Program	Number of Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	12	7,626	6,327	6,037	95.4%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	125	125	89	71.0%
Southeast Tennessee	1	75	75	75	100.0%
Southwest Tennessee	1	673	673	673	100.0%
Upper Cumberland	1	59	59	59	100.0%

Goal 6 and Performance Indicator 6.3 (cont'd.)

Adult Measure 2

Parents and other adults learn and exhibit improved family functioning skills	Eligible Entities Reporting	Number of Participants Enrolled in Program	Participants Expected to Achieve Outcome in Reporting Period (Target)	Number of Participants Achieving Outcome in Reporting Period	Percentage Achieving Outcome in Reporting Period
All CSBG Agencies	13	7,296	6,316	5,844	92.5%
Delta	N/A	N/A	N/A	N/A	N/A
South Central Tennessee	1	125	125	91	73.0%
Southeast Tennessee	1	50	50	50	100.0%
Southwest Tennessee	1	673	673	673	100.0%
Upper Cumberland	1	59	59	59	100.0%

Source: Tennessee Department of Human Services, Child Care, Adult and Community Programs.

The source of the data presented in the appendix is “2005 National Performance Indicators” and was obtained from the Tennessee Department of Human Services, Division of Community Services. The data are for FYE 2004.

Definitions:

Eligible Entities Reporting: Total community action agencies and human resource agencies using the measure that receive CSBG grants in Tennessee.

Number of Participants Enrolled in Program: Number of units (individuals or households) participating in program.

Participants Expected to Achieve Outcome in Reporting Period (Target): Number of participants expected to achieve a specific outcome during the time period.

Number of Participants Achieving Outcome in Reporting Period: Number of units (participants or households) who accomplish the stated outcome during the time period.

Percentage Achieving Outcome in Reporting Period: Percentage of units in target that achieve outcome during the time period.

Appendix 3
2005 State Supplements to Energy Assistance
Description of Supplement

	Alabama	Arkansas	Georgia	Kentucky
State and Local Funds		Customers with an annual household income of less than \$12,000 are exempt from sales tax on the first 500 kwh each month.		County and community funds provide utility payments for emergency assistance.
State Public Benefit Funds			Fund established by surcharges on large industrial users supplements LIHEAP funds.	
Private Funds – Charitable Organizations, Churches, etc.	Charitable trust created with utility shareholder funds provides assistance for qualified households with health risks or in a severe financial crisis, for energy efficiency improvements and energy counseling. Another program funded by contributions from utility customers, employees, and stockholders serves senior citizens, disabled persons, and low-income households.	Utility provides funds to non-profits, Area Agency on Aging, the Red Cross, churches, and community action agencies for energy assistance. Another program, funded by customer and employee donations and supplemented by a \$5,000 monthly company match, provides utility bill assistance to customers that are at risk of losing their gas service. Project Deserve is funded by customer donations to Entergy Arkansas, Inc., and Company contributions. Funds provide energy crisis assistance cash payment toward the household's electric bill.	Statewide fuel fund, administered by a charitable group and funded by a utility and its customers, provides energy assistance. Another program, funded by donations from citizens and utilities contributes to energy assistance programs.	Public Service Commission mandates regulated utilities participate in programs to raise funds for energy assistance. Community action agencies administer the program.
Utility	Major electric power company and two gas companies waived monthly customer service charge for SSI, Medicaid, and TANF recipients.		Public Service Commission mandates gas and electric utilities waive their monthly service charge for customers ages 65 and over whose income is under \$14,355.	Discounts and reconnect waivers from two utilities. Utility contributions for weatherization programs.
Bulk Fuel Discount				
Other				

Source: LIHEAP Clearinghouse.

**Appendix 3 (cont'd.)
2005 State Supplements to Energy Assistance**

	Mississippi	Missouri	North Carolina	Virginia
State and Local Funds			City/county government general assistance funds	State and local funds made available for weatherization and housing rehabilitation. Waiver of state sales tax on deliverable fuels for LIHEAP customers. State general funds added to LIHEAP Assistance.
State Public Benefit Funds				
Private Funds – Charitable Organizations, Churches, etc.	Customer and stockholder contributions from three utilities and church and community donations.	Fuel funds from five utility companies help low-income clients with utilities. Neighborhood Assistance Program (NAP) allows state governments to provide tax credits to contributing businesses. A gas utility matches customer donations for energy assistance to households with special needs to keep utility services operating during the extreme temperature seasons of winter and summer.	Partnership between religious community, a gas and an electric utility, that provides utility assistance as well as other assistance. Several utility companies have assistance programs funded by customers and shareholders.	Several utilities help low-income households pay energy bills through funding from stockholders, employees and customers, businesses, churches, and civic groups.
Utility	Monthly service charge waived for eligible low-income and elderly customers of the largest electric utility. Some utilities waive reconnection fees and late payment charges.	One utility contributed to LIHEAP as part of an electric rate case settlement.		
Bulk Fuel Discount			Discounts on propane and fuel oil.	Companies agree to waive security deposits.
Other	Supplier discounts for weatherization supplies and air conditioners. Community donations of weatherization supplies, clothes and appliances. Volunteer hours to install weatherization materials.			

Source: LIHEAP Clearinghouse.

**Appendix 3 (cont'd.)
2005 State Supplements to Energy Assistance
Total Dollars**

State	State and Local Funds	State Public Benefit Funds		Private Funds	Utility		Bulk Fuel Discount	Other	Total
		Rate Assistance	Energy Efficiency		Rate Assistance	Energy Efficiency			
Alabama				\$2,572,693	\$1,741,198				\$4,313,891
Arkansas	\$1,000,000			14,496,303					15,496,303
Georgia		\$5,594,655		564,141	13,020,000	\$1,430,000			20,608,796
Kentucky	217,459			1,402,477	898,417	361,418			2,879,771
Mississippi				766,240	194,990			\$831,930	1,793,160
Missouri				8,381,146		500,000			8,881,146
North Carolina	225,917			2,598,726			\$3,039		2,827,682
Tennessee									
Virginia	2,853,486			1,251,207	110,458				4,215,151
Total	\$4,296,862	\$5,594,655	\$0	\$32,032,933	\$15,965,063	\$2,291,418	\$3,039	\$831,930	\$61,015,900

The two state categories, State and Local Fund, and State Public Benefits Funds, differ as follows: The former are funds from state, county, or city governments, usually from general funds, special taxes, or tax waivers. Public benefit funds, also called system benefit funds, or universal service funds, are those created through state electric or natural gas restructuring legislation or regulation. Funding comes from a charge assessed on electric and/or gas consumers, which states refer to as a public goods surcharge, system benefits charge, societal benefits charge, public benefits fee, universal service fee, meters charge, etc. These funds are administered or overseen by a state agency, typically the state LIHEAP/weatherization agency or the regulatory commission.

Source: LIHEAP Clearinghouse.

Appendix 4 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. In response to a request from members of the Government Operations Committee, we compiled information concerning federal financial assistance received by the human resource agencies and the agencies' efforts to comply with Title VI requirements. The results of the information gathered are summarized below.

All nine human resource agencies complete a Title VI survey annually and report it to the Tennessee Department of Human Services (DHS) Title VI coordinator. The surveys are due at the end of May each year. These surveys include questions about complaints and complaint resolutions, and ethnic breakdown of board members, employees, and the service area. They also include questions regarding non-discrimination policies, Title VI coordinators, and the number of Title VI complaints received and resolved. According to the DHS Title VI coordinator, human resource agencies are only required to submit a new plan if they significantly alter their current plan. During our review, we met with the DHS Title VI coordinator and checked for current surveys from the agencies. We were able to find surveys for all nine agencies, although three had date discrepancies: one was several months late, one was not signed or dated, and one had the date marked as "06." The DHS Title VI coordinator indicated that beginning with the 2007 surveys, a letter will be sent with each survey describing the importance of returning the forms timely and providing more detailed information about how to complete the survey.

Delta HRA

According to Delta Human Resources Agency's Title VI plan, each agency department collects and maintains statistical data for service participants, where applicable. In addition, the agency prepares a Title VI self-survey, or if located away from the Central Office, staff note any progress on the Section 504 Self-Evaluation.

Delta Human Resource Agency's Title VI plan designates duties of its Title VI coordinator. However, no name or contact information is provided. The coordinator's duties include reviewing annual self-surveys submitted by each department within the agency, ensuring that all employees have received Title VI orientation and training, and compiling an annual report based on a review of self-surveys to be presented to the board of directors. Any problems the coordinator discovers are reported to the agency executive director.

The plan provides Delta HRA's procedures for working with clients' information about how they can or will handle situations involving people with limited English proficiency. It discusses interpreter guidelines and a list of documents that will be available in Spanish.

Title VI complaints must be filed within 30 days of occurrence. Complaints must include the complainant's information, as much detailed information about the incident as possible, and

names of any people who could potentially help prove or disprove the allegation. Delta's plan does not address how the complaint will be handled after it is received.

Delta HRA Program Client Ethnicity*
FY 2006

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Community Services Block Grant	1,220	2,604	25	0	8	31	3,888
USDA	1,105	2,527	14	0	9	27	3,682
Total	2,325	5,131	39	0	17	58	7,570

* The agency has other programs but does not track client ethnicity for those programs.

Delta HRA Policy Council Members (1)
Gender and Ethnicity

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total (2)	5	3	0	3	0	0	5	0

(1) The nine-member policy council acts on behalf of the governing board.

(2) The policy council has one vacancy.

Delta HRA Employees
Gender and Ethnicity

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Administrative Assistant	0	2	0	2	0	0	0	0
Executive Director	1	0	0	1	0	0	0	0
Executive Secretary	0	1	0	0	0	0	1	0
Fiscal Officer	1	0	0	0	0	0	1	0
Clerk	0	2	0	0	0	0	2	0
Receptionist	0	1	0	1	0	0	0	0
Child Care Clerk	0	1	0	0	0	0	1	0
Child Care Supervisor	0	1	0	0	0	0	1	0
Housing/Energy Specialist	0	1	0	1	0	0	0	0
Energy Auditor/Emergency Assistance	1	0	0	1	0	0	0	0
Emergency Coordinator	0	1	0	1	0	0	0	0
Assistant LIHEAP and Receptionist	0	1	0	1	0	0	0	0
Community Coordinator	0	2	0	2	0	0	0	0
Bus Driver	16	17	0	25	0	0	8	0
Transportation Director	1	0	0	0	0	0	1	0
Dispatcher	0	3	0	2	0	0	1	0
Program Director	0	1	0	0	0	0	1	0
Total	20	34	0	37	0	0	17	0

East Tennessee HRA

East Tennessee HRA’s Title VI plan designates a full-time Title VI coordinator but does not have a complaint resolution process included in its Agency Plan. There are detailed procedures outlined for filing and resolution of grievances, including appeal procedures in the case of a complainant seeking further resolution to any problem.

Included in the plan is a self-evaluation for compliance with Section 504 of the Rehabilitation Act of 1973 and a copy of a departmental survey that is completed annually. There is also an administrative survey that breaks down the ethnic composition of the board of directors. According to the plan, employees receive Title VI training during orientation, as well as during the annual staff meeting.

Assurances are included that state that the agency will comply with Title VI of the Civil Rights Act of 1964, and with Section 504 of the Rehabilitation Act of 1973.

**East Tennessee HRA Program Client Ethnicity *
FY 2006**

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Legal Services for the Elderly	258	3	0	0	0	0	261
Workforce Investment - Incumbent Worker	360	3	0	1	0	9	373
Workforce Investment - Fast Track	279	3	0	1	0	0	283
Workforce Investment - Youth	608	39	0	0	3	4	654
Workforce Investment - Dislocated Worker	377	9	1	3	1	6	397
Low Income Home Energy Assistance Program	4,391	70	0	0	6	1	4,468
Weatherization	72	0	0	0	0	0	72
Home Investment Partnership Program (HOME)	21	0	0	0	0	0	21
Homemaker	384	25	6	0	0	0	415
Ryan White Dental	63	22	1	0	0	0	86
Ryan White Insurance	192	32	0	1	1	4	230
Community Services Block Grant	11,424	56	4	5	2	20	11,511
Child Care Food Centers	216	70	0	0	0	16	302
Child Care Food Homes	513	390	0	0	0	42	945
Community Intervention	81	5	1	0	0	0	87
Senior Employment	36	1	0	0	0	0	37
Housing	1,488	156	9	4	1	3	1,661
Total	20,763	884	22	15	14	105	21,803

* The agency has other programs but does not track client ethnicity for those programs.

**East Tennessee HRA Board Members
Gender and Ethnicity**

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total	86	12	0	0	0	0	98	0

**East Tennessee HRA Employees
Gender and Ethnicity**

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Administrative Assistant	0	1	0	0	0	0	1	0
Administrative Assistant II	0	1	0	0	0	0	1	0
Administrator I	3	4	0	0	0	0	7	0
Administrator II	1	2	0	0	0	0	3	0
Attorney	0	1	0	0	0	0	1	0
Chore Service Aide	0	6	0	0	0	0	6	0
CIS Case Manager	0	3	0	0	0	0	3	0
Clerk	0	6	0	0	0	0	6	0
Community Corrections Officer	11	6	0	0	0	0	17	0
Cook	0	2	0	0	0	0	2	0
Coordinator	0	12	0	0	1	0	11	0
Coordinator II	3	0	0	1	0	0	2	0
Director	0	5	0	0	0	0	5	0
District Supervisor	2	1	0	0	0	0	3	0
Executive Director	1	0	0	0	0	0	1	0
Employment Career Specialist	0	9	1	0	0	0	8	0
Food Service Worker	0	16	0	0	0	0	16	0
Homemaker	0	9	0	2	0	0	7	0
Maintenance Tech II	3	0	0	0	0	0	3	0
Manager I	3	10	0	0	0	0	13	0
Manager II	1	8	0	0	0	0	9	0
Misdemeanor Probation Officer	19	18	0	1	0	0	36	0
Probation Officer/Instructor	3	0	0	0	0	0	3	0
Program Tech I	0	10	0	0	0	0	10	0
Program Tech II	1	6	0	0	0	0	7	0
Receptionist II	0	2	0	0	0	0	2	0
Region Scheduler	0	4	0	0	0	0	4	0
Secretary	0	2	0	1	0	0	1	0
Service Coordinator	1	5	0	0	0	0	6	0
Service Coordinator II	0	3	0	0	0	0	3	0
Specialist I	3	27	1	3	0	0	26	0
Specialist II	2	25	0	1	0	0	26	0
Staff Accountant	1	2	0	0	0	0	3	0
Van Driver	65	63	0	5	0	0	123	0
Total	123	269	2	14	1	0	375	0

First Tennessee HRA

First Tennessee Human Resource Agency’s Title VI coordinator role is filled by the Human Resource Administrator. The coordinator’s duties include educating staff about Title VI, informing clients of their rights, monitoring the agency internally for compliance, and submitting all required documentation.

First Tennessee Human Resource Agency’s Title VI plan outlines the legislative background for Title VI and provides a list of prohibited actions. It includes policies regarding public notification, along with guidance on how to implement this notification.

The plan also includes policies and procedures for serving Limited English Proficiency clients, including interpreter services and agency demographic assessments.

The complaint procedures explain the difference between an inquiry and a complaint, along with the information that should be included: complainant’s information, description of the alleged act, information on who committed the alleged act, basis of the complaint, date of the complaint, and information regarding any witnesses. These complaints must be filed within 180 days of alleged discrimination. The plan includes an outline for how complaints and their subsequent hearings are to be handled, but specific policies are not included.

**First Tennessee HRA Program Client Ethnicity *
FY 2006**

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Adult Day Services	80	3	1	0	0	0	84
Elderly Nutrition	2,156	46	7	2	3	4	2,218
Minor Home Modification	134	2	0	0	0	0	136
Family Support Service	205	5	0	0	0	0	210
Safe Passage Domestic Violence Program	54	4	5	0	0	1	64
Total	2,629	60	13	2	3	5	2,712

* The agency has other programs but does not track client ethnicity for those programs.

**First Tennessee HRA Board Members
Gender and Ethnicity**

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total	29	1	0	0	0	0	30	0

**First Tennessee HRA Employees
Gender and Ethnicity**

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Accountant	0	1	0	0	0	0	1	0
Accounting Assistant	0	2	0	0	0	0	2	0
Alternative Community Corrections Case Officer	2	3	0	0	0	0	5	0
Alternative Community Corrections Community Service Coordinator	1	0	0	0	0	0	1	0
Alternative Community Corrections Program Manager	0	1	0	0	0	0	1	0
Alternative Community Corrections TOMIS Coordinator	0	1	0	0	0	0	1	0
Alternative Community Corrections Senior Case Officer/Operations Manager	1	0	0	0	0	0	1	0
Administrative Clerk	0	1	0	0	0	0	1	0
Administrative Aide to Executive Director	0	1	0	0	0	0	1	0
Adult Day Services Program Aide	0	5	0	2	0	0	3	0
Adult Day Services Program Director	0	1	0	0	0	0	1	0
Adult Day Services Program Senior Aide	0	1	0	0	0	0	1	0
Adult Day Services Program Van Driver/Aide	1	0	0	0	0	0	1	0
Child Care Food Program Manager	0	1	0	0	0	0	1	0
Child Care Food Program Monitoring Assistant	0	1	0	0	0	0	1	0
Case Manager/Data Entry	1	0	0	0	0	0	1	0
Director - Corporate Operations	1	0	0	0	0	0	1	0
Domestic Violence Program Manager	0	1	0	0	0	0	1	0
Executive Director	1	0	0	0	0	0	1	0
Executive Director Advisor	1	0	0	0	0	0	1	0
Facilities Technician	1	0	0	0	0	0	1	0
Family Support Services Analyst	0	9	0	0	0	0	9	0
Foster Grandparents Administrative Assistant/Field Coordinator	0	1	0	0	0	0	1	0

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Foster Grandparents Program Manager	0	1	0	0	0	0	1	0
Family Services Institute Director	1	0	0	0	0	0	1	0
Family Services Institute Program Monitor	0	1	0	0	0	0	1	0
Family Support Services Case Manager	1	0	0	1	0	0	0	0
Homemaker Certified Home Attendant	0	10	0	0	0	0	10	0
Homemaker Administrative Aide	0	1	0	0	0	0	1	0
Human Resource Administrator	0	1	0	0	0	0	1	0
Misdemeanor Probation Case Officer/Instructor	2	6	1	0	0	0	7	0
Misdemeanor Probation Case Officer Intake Coordinator	0	1	0	0	0	0	1	0
Misdemeanor Probation Program Manager	0	1	0	0	0	0	1	0
Nutrition Mealsite Coordinator	0	20	0	0	0	0	20	0
Nutrition Mealsite Site Supervisor	0	1	0	0	0	0	1	0
Nutrition Route Coordinator	0	1	0	0	0	0	1	0
Nutrition Kitchen Supervisor	1	0	0	0	0	0	1	0
Nutrition System Specialist	0	1	0	0	0	0	1	0
Nutrition Head Cook	0	1	0	0	0	0	1	0
Nutrition Van Driver	2	1	0	0	0	0	3	0
Nutrition Cook	0	3	0	0	0	0	3	0
Nutrition Program Director	1	0	0	0	0	0	1	0
Nutrition Cook/Relief Van Driver	2	2	0	0	0	0	4	0
Safe Passage Domestic Violence Shelter Advocate	0	5	0	1	0	0	4	0
Safe Passage Program Manager	0	1	0	0	0	0	1	0
Safe Passage Shelter Manager	0	1	0	0	0	0	1	0
Transportation Billing Assistant	0	1	0	0	0	0	1	0
Transportation Call Center Customer Service Representative	0	2	0	0	0	0	2	0

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Transportation Call Center Manager	0	1	0	0	0	0	1	0
Transportation Central Dispatcher	0	1	0	0	0	0	1	0
Transportation Maintenance Technician	1	0	0	0	0	0	1	0
Transportation Van Driver 15 Passenger	13	8	0	0	0	0	21	0
Transportation Van Driver Wheelchair	12	8	0	0	0	0	20	0
Transportation Families First Coordinator	0	1	0	0	0	0	1	0
Transportation Administrative Manager	0	1	0	0	0	0	1	0
Transportation Operations Manager	0	1	0	0	0	0	1	0
Transportation Safety and Training Coordinator	1	0	0	0	0	0	1	0
Youth Services Juvenile Probation Program Manager	0	1	0	0	0	0	1	0
Total	47	114	1	4	0	0	156	0

Mid-Cumberland HRA

Mid-Cumberland Human Resource Agency’s Title VI plan consists primarily of the agency’s complaint procedure. However, the plan includes some other information such as the name and phone number of the coordinator. A coordinator is listed and may be reached at (615) 331-6033.

Mid-Cumberland’s complaint procedure includes contradictory time frames in which complaints must be filed. One section states that it must be filed within 180 days, and another section indicates that it must be filed within 30 days. The plan details the steps involved with filing a complaint. First, the complainant must fill out forms distributed by the Finance Department and the Title VI coordinator. Valid complaints are forwarded to the Tennessee Human Rights Commission. The Title VI coordinator investigates the allegations, and the investigation includes the interviewing of witnesses and sending the complainant a letter requesting an appointment to discuss the allegation. The complainant is notified of the coordinator’s findings and recommendations within 90 days of the submission of the complaint. Corrective action is developed with input from the complainant. This is submitted to Mid-Cumberland HRA’s executive director, but the plan of correction must be approved by the complainant, Title VI coordinator, and the executive director. If the allegations are dismissed, or an agreement cannot be reached, an appeal may be filed with the Tennessee Human Rights Commission.

**Mid-Cumberland HRA Program Client Ethnicity *
FY 2006**

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Transportation	4,008	1,104	83	0	0	0	5,195
Senior Nutrition	3,662	502	34	29	16	0	4,243
Ombudsman	246	28	0	0	0	2	276
Minority Applicant Pool System	54	35	0	1	0	0	90
Homemaker	176	46	0	0	0	0	222
YouthCAN	108	145	6	3	1	7	270
Total	8,254	1,860	123	33	17	9	10,296

* The agency has other programs but does not track client ethnicity for those programs.

**Mid-Cumberland HRA Board Members
Gender and Ethnicity**

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total	70	15	0	3	0	0	82	0

**Mid-Cumberland HRA Employees
Gender and Ethnicity**

Position Title	Gender		Ethnicity						
	Male	Female	Asian	Black	Hispanic	Indian	White	Other	
Administrative Assistant	0	6	0	1	0	0	5	0	
Area Coordinator	0	4	0	0	0	0	4	0	
Assistant County Coordinator	2	0	0	0	0	0	2	0	
Backup Site Aide	0	15	0	2	0	0	13	0	
Backup Site Manager	1	10	0	1	0	0	10	0	
Case Officer	3	7	0	1	0	0	9	0	
Counselor	0	12	0	4	0	0	8	0	
County Coordinator	4	6	0	4	0	0	6	0	
Director	0	9	0	1	0	0	8	0	
Division Manager	0	1	0	0	0	0	1	0	
Executive Director	0	1	0	0	0	0	1	0	
Finance	0	2	0	0	0	0	2	0	
Homemaker	1	33	0	9	0	0	25	0	
Office Assistant	0	2	0	0	0	0	2	0	
Probation Officer	4	3	0	0	0	0	7	0	
Program Tech	0	5	0	3	0	0	2	0	
Receptionist	0	1	0	0	0	0	1	0	
Site Aide	2	15	0	2	1	0	14	0	
Site Manager	2	20	0	4	0	0	18	0	
Surveillance Officer	2	0	0	1	0	0	1	0	
Van Driver	37	38	0	10	0	0	65	0	
WIC	0	2	0	0	0	0	2	0	
Youth	2	0	0	0	0	0	2	0	
Total	60	192	0	43	1	0	208	0	

Northwest Tennessee HRA

Northwest Tennessee Human Resource Agency’s Title VI plan includes the same legal background, guidance for public notification, differentiation between inquiries and complaints, instructions for filing a complaint, and outline for complaint handling procedures as First Tennessee Human Resource Agency’s plan.

The assistant director of the Nutrition program is designated as the Title VI coordinator. Coordinator duties include, but are not limited to employee and staff training regarding Title VI, informing clients of their rights under Title VI, developing Limited English Proficiency guidelines, ensuring that all contracts contain a Title VI clause, maintaining records of ethnicity and gender groups who are awarded contracts on bids, and submission of Title VI compliance reports.

The plan also outlines duties of the Title VI committee; however, it does not outline committee composition.

**Northwest HRA Program Client Ethnicity *
FY 2006**

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Homemaker							
Social Services Block Grant	215	41	0	0	0	0	256
Senior Nutrition	967	283	4	0	0	0	1,254
Total	1,182	324	4	0	0	00	1,510

* The agency has other programs but does not track client ethnicity for those programs.

**Northwest HRA Policy Council Members
Gender and Ethnicity ***

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total	14	1	0	2	0	0	13	0

* The policy council acts on behalf of the governing board.

**Northwest HRA Employees
Gender and Ethnicity**

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Executive Director	1	0	0	0	0	0	1	0
Controller	1	0	0	0	0	0	1	0
Office Manager/Financial Officer	0	1	0	0	0	0	1	0
Assistant Office Manager/Assistant Financial Officer	0	1	0	0	0	0	1	0
Receptionist	0	1	0	0	0	0	1	0
Maintenance	1	0	0	0	0	0	1	0
Program Director	1	4	0	1	0	0	4	0
Assistant Director	0	1	0	1	0	0	0	0
Office Manager	0	1	0	0	0	0	1	0
Clerk	0	1	0	0	0	0	1	0
Ombudsman	0	1	0	1	0	0	0	0
Volunteer Coordinator	1	2	0	2	0	0	1	0
Secretary	0	1	0	1	0	0	0	0
Program Coordinator	0	1	0	0	0	0	1	0
Billings Specialist	0	1	0	0	0	0	1	0
Training and Insurance Coordinator	0	1	0	0	0	0	1	0
Access to Jobs/Families First Coordinator	0	1	0	0	0	0	1	0
Data Entry Clerk	0	1	0	0	0	0	1	0
Mechanic	1	0	0	0	0	0	1	0
Mechanic's Assistant	1	0	0	0	0	0	1	0
Homemaker	0	22	0	9	0	0	13	0
CNA	0	5	0	0	0	0	5	0
Nutrition County Coordinator	0	4	0	2	0	0	2	0
Assistant County Coordinator	0	1	0	0	0	0	1	0
Site Manager	0	4	0	0	0	0	4	0
Options Coordinator	0	1	0	0	0	0	1	0
Driver: Nutrition	1	0	0	0	0	0	1	0
Library Aide	0	7	0	1	0	0	6	0
Nutrition Aide	0	6	0	3	0	0	3	0
Receptionist	0	8	0	1	0	0	7	0
Office Aide	0	20	0	4	0	0	16	0
Teacher's Aide	1	7	0	4	0	0	4	0
Maintenance Aide	3	4	0	0	0	0	7	0
Thrift Store Aide	0	1	0	0	0	0	1	0
Arts and Crafts Aide	0	1	0	0	0	0	1	0
Cafeteria Aide	0	1	0	0	0	0	1	0
Senior Center Aide	0	4	0	2	0	0	2	0
Patient Aide	0	1	0	0	0	0	1	0
Administrative Assistant	0	1	0	0	0	0	1	0
Clerical Aide	0	1	0	0	0	0	1	0
Activity Coordinator	1	0	0	0	0	0	1	0
Assistant County Coordinator: Transportation	1	6	0	0	0	0	7	0
County Coordinator: Transportation	0	7	0	1	0	0	6	0

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Van Driver: Transportation	53	32	0	15	0	0	70	0
Total	67	163	0	48	0	0	182	0

South Central Tennessee HRA

South Central Tennessee Human Resource Agency's Title VI plan lists the responsibility of each department in information gathering. Each department is required to collect statistical data on program participants, prepare an annual Title VI self-survey, and, if the department is located away from the Central Office, note progress on the Section 504 Self-Evaluation Survey.

South Central Tennessee Human Resource Agency's Weatherization Program Director also serves as the Title VI coordinator. The Title VI plan outlines the coordinator's responsibilities, including reviewing the information gathered annually by each department and ensuring that employees have received appropriate training. The Title VI coordinator compiles an annual compliance report to present to the board of directors and reports any compliance problems to the executive director.

If an agency employee has engaged in discriminatory practices, he or she will be disciplined according to agency procedures. The plan does not describe this any further. The plan does not outline how complaints should be filed or the procedures for handling complaints.

The plan states that the methods used to provide public notification of Title VI are new employee orientation, staff meetings, brochures and pamphlets, and that "Minority news media sources will be sought out and utilized to ensure wide distribution of information regarding the agency, its programs and Title VI policy."

The plan includes a signed Assurance of Compliance dated February 11, 2004.

South Central Tennessee HRA Program Client Ethnicity * FY 2006

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Families First	1,513	421	25	0	1	26	1,986
Head Start/Early Head Start	785	259	102	4	1	103	1,254
Weatherization	100	21	0	0	0	0	121
Emergency Food Assistance Program	15,188	2,817	70	0	25	8	18,108
Community Corrections	212	47	4	0	0	0	263
Long Term Care Ombudsman	113	19	0	0	0	15	147
Community Services Block Grant/Low Income Home Energy Assistance Program/Chore/Commodities	14,554	2,433	61	3	36	40	17,127
Total	32,465	6,017	262	7	63	192	39,006

* The agency has other programs but does not track client ethnicity for those programs.

**South Central Tennessee HRA Policy Council Members
Gender and Ethnicity**

Gender		Ethnicity						
	Male	Female	Asian	Black	Hispanic	American Indian	White	Other
Total	18	9	0	5	0	0	22	0

**South Central Tennessee HRA Employees *
Gender and Ethnicity**

Position Title	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Executive	2	4	0	0	0	0	6	0
Building	2	1	0	2	0	0	1	0
Title VI/SCSEP	0	8	0	0	0	0	8	0
Head Start/Early Head Start	5	171	2	58	7	0	111	0
Fiscal	1	8	0	0	0	0	9	0
Community Corrections	2	5	0	2	0	0	5	0
RSVP	0	1	0	0	0	0	1	0
Families First	0	13	0	5	0	0	8	0
Weatherization/EFAP	1	2	0	0	0	0	3	0
Foster Grandparent Program	0	2	0	0	0	0	2	0
MPS/DUI	3	4	0	1	0	0	6	0
CSBG/ChildCare/LIHEAP	0	34	0	3	0	0	31	0
Child Care	0	29	0	3	0	0	26	0
Protective Service Homemaker	0	7	0	0	0	0	7	0
Homemaker-HCBS	1	35	0	3	0	0	33	0
LIHEAP	0	28	0	3	0	0	25	0
LTC Ombudsman	0	3	0	0	0	0	3	0
Nutrition	7	31	0	0	0	0	38	0
Total	24	386	2	80	7	0	323	0

* The agency has 2 employees whose ethnicity is Asian, but the agency did not specify gender for those employees.

Southeast Tennessee HRA

Southeast Tennessee Human Resource Agency’s Title VI plan lists the responsibility of each department in information gathering. Each department is required to collect statistical data on program participants, prepare an annual Title VI self-survey, and, if the department is located away from the Central Office, note progress on the Section 504 Self-Evaluation Survey.

The Title VI plan outlines the coordinator’s responsibilities, including reviewing the information gathered annually by each department and ensuring that employees have received appropriate training. The Title VI coordinator compiles an annual compliance report to present to the board of directors and reports any compliance problems to the executive director.

If an agency employee has engaged in discriminatory practices, the employee will be disciplined according to agency procedures. The plan does not describe this any further. The plan does not outline how complaints should be filed or the procedures for handling complaints.

Southeast Tennessee HRA Program Client Ethnicity *
FY 2006

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Housing Assistance	774	38	6	1	2	1	822
Community Services Block Grant, Low Income Home Energy Assistance Program, Weatherization Assistance Program, Federal Emergency Management Assistance, Child Adult Care Food Program, HMPC, Title III, Options, Nutrition, Waiver, Family Caregiver, MODS	7,780	261	52	1	9	45	8,148
Total	8,554	299	58	2	11	46	8,970

* The agency has other programs but does not track client ethnicity for those programs.

Southeast Tennessee HRA Board Members
Gender and Ethnicity

	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	American Indian	White	Other
Total	58	0	0	1	0	0	57	0

Southeast Tennessee HRA Employees
Gender and Ethnicity

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Executive Director	1	0	0	0	0	0	1	0
Assistant Executive Director	1	0	0	0	0	0	1	0
Executive Secretary	0	1	0	0	0	0	1	0
Receptionist	0	1	0	0	0	0	1	0
Maintenance	1	0	0	0	0	0	1	0
Info Systems Tech	0	1	0	0	0	0	1	0
Fiscal Officer	1	0	0	0	0	0	1	0
Payroll Accountant	0	1	0	0	0	0	1	0
Finance Report Specialist	0	1	0	0	0	0	1	0
Accounting Clerk 1	0	1	0	0	0	0	1	0
Accounting Clerk 2	0	1	0	0	0	0	1	0
Child Care Director	0	1	0	0	0	0	1	0
Child Care Certificate Clerk	0	4	0	0	0	0	4	0
Social Security Representative Payee Director	0	1	0	0	0	0	1	0
Social Security Representative Payee Clerk	0	1	0	0	0	0	1	0
Career Specialist	0	7	0	0	0	0	7	0
Self Sufficiency Director	0	1	0	0	0	0	1	0
Self Sufficiency Clerk	0	1	0	0	0	0	1	0
HM/PC Aides	0	11	0	1	0	0	10	0

Position Title	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Nutrition	2	2	0	0	0	0	4	0
Community Prevention Initiative Director	1	0	0	0	0	0	1	0
CPI Case Worker	0	2	0	0	0	0	2	0
County Manager	0	8	0	0	0	0	8	0
Weatherization Director	0	1	0	0	0	0	1	0
Misdemeanor Director	0	1	0	0	0	0	1	0
Misdemeanor Case Worker	1	3	0	0	0	0	4	0
Community Corrections Director	0	1	0	0	0	0	1	0
Community Corrections Secretary	0	1	0	0	0	0	1	0
Community Corrections Case Officer	2	2	0	0	0	0	4	0
Call Center	0	2	0	0	0	0	2	0
Mechanic	4	0	0	0	0	0	4	0
Community Intervention Services Case Worker	1	0	0	0	0	0	1	0
CSBG Director	0	1	0	0	0	0	1	0
Access to Jobs Director	0	1	0	0	0	0	1	0
Transit Training Specialist	0	1	0	0	0	0	1	0
Transportation Director 5307	1	0	0	0	0	0	1	0
Transportation Director 5311	0	1	0	0	0	0	1	0
Hamilton County Director	1	0	0	0	0	0	1	0
Hamilton County Manager	0	1	0	1	0	0	0	0
Transportation Driver	44	77	0	29	0	0	92	0
Bus Aide	0	9	0	9	0	0	0	0
Dispatcher	0	3	0	2	0	0	1	0
Total	61	151	0	42	0	0	170	0

Southwest Tennessee HRA

Southwest Tennessee HRA's Title VI policies include documentation requirements for each program/department. Some of the items that the agency's internal policy requires them to track are: statistical data of participants in services provided through each program, a Title VI Self-Survey for each program each year, and a Section 504 self-survey each year for programs stationed outside of the Central Office.

Responsibilities of the Title VI coordinator are also outlined. The coordinator reviews information collected by each department annually, ensures employees are properly oriented toward Title VI and Section 504 issues, reports any issues of non-compliance to the executive director, and compiles an annual Title VI compliance report.

Any subrecipients found to be participating in discriminatory practices are given 30 days to cease these practices or be subject to contract suspension, termination, or rejection.

The Title VI policy provided to Audit Staff lists the methods used for public notification about Title VI: new employee orientation, staff meetings, brochures and pamphlets, the inclusion

of a non-discrimination statement on all agency publications, and seeking out minority news media sources to use as an advertisement platform for the agency.

Southwest Tennessee Human Resource Agency sent us correspondence received on February 2, 2007, indicating that it does not track client gender or ethnicity. In addition, it does not break down employee information by job title, only by program. We did not receive any gender or ethnicity information on the board members.

Southwest Tennessee HRA Employees Gender and Ethnicity

Gender			Ethnicity					
Program	Male	Female	Asian	Black	Hispanic	American Indian	White	Other
Head Start	3	100	0	36	1	0	66	0
Transportation	35	40	0	32	0	0	43	0
Senior Services	0	34	0	10	0	0	24	0
Community Services	3	11	0	5	0	0	9	0
Child Care	0	8	0	1	0	0	7	0
Workforce Investment	8	35	0	20	0	0	23	0
Fiscal	1	5	0	0	0	0	6	0
Administration	1	2	0	0	0	0	3	0
Total	51	235	0	104	1	0	181	0

Upper Cumberland HRA

Upper Cumberland Human Resource Agency has designated its Human Resource Manager/Equal Opportunity Officer as its Title VI coordinator.

Upper Cumberland Human Resource Agency's plan includes a statement of the Title VI statute and regulations and a description of Title VI regulations in the Limited English Proficiency context. This description discusses the steps for handling language interpretation, limitations on who is allowed as an interpreter, methods for providing notices to clients with Limited English Proficiency, and policies on written material interpretation.

There is an additional plan included inside the Title VI plan titled "Improved Access to Services for Persons with Limited English Proficiency Plan" dated January 2006. This plan includes the purpose, legal authority, steps the agency must take, and the process for implementing the plan. The process includes assessment, development, and implementation of a written policy on language access, staff training, and monitoring. Also included in the plan are annual Upper Cumberland HRA assessments of LEP needs for each county in the service area, dated January 11, 2006.

Its Title VI policies include documentation requirements for each program/department. Some of the things that the agency's internal policy requires staff to track are statistical data of participants in services provided through each program, a Title VI Self-Survey for each program

each year, and a Section 504 self-survey each year for programs stationed outside of the Central Office.

Responsibilities of the Title VI coordinator are also outlined. The coordinator reviews information collected by each department annually, ensures employees are properly oriented toward Title VI and Section 504 issues, reports any issues of non-compliance to the executive director, and compiles an annual Title VI compliance report.

Any subrecipients found to be participating in discriminatory practices are given 30 days to cease these practices or be subject to contract suspension, termination, or rejection.

Upper Cumberland HRA's plan includes a signed assurance that the agency will comply with Title VI regulations dated October 26, 2005. It also includes a signed and completed Section 504 Self-Evaluation Checklist dated January 5, 2006. The Title VI coordinator included a form detailing areas examined for problems and corrective action to be taken as part of the 504 Self-Evaluation.

Upper Cumberland HRA Program Client Ethnicity FY 2006

Program	Ethnicity						Total
	White	Black	Hispanic	Asian	Indian	Other	
Local Workforce Investment Act	1,901	54	6	6	1	0	1,968
Adult Protective Services Homemaker	60	2	0	0	0	0	62
Emergency Program	2,177	68	25	0	10	14	2,294
Commodities	11,897	110	37	1	34	32	12,111
Emergency Food and Shelter	1,023	42	11	0	1	15	1,092
Low Income Home Energy Assistance Program	3,889	61	10	0	8	21	3,989
Homemaker	142	1	0	0	0	0	143
Individual Deposit Accounts	97	4	1	1	0	2	105
Job Access	156	2	1	0	1	27	187
Information and Referral	3,500	40	15	2	12	3	3,572
Elderly Chore	77	1	0	0	0	0	78
Nutrition Program	96	5	0	0	0	1	102
Weatherization	51	0	0	0	0	1	52
Total	25,066	390	106	10	67	116	25,755

Upper Cumberland HRA Board Members * Gender and Ethnicity

Gender	Ethnicity							
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Total	47	13		4	0	0	56	0

* The board has two vacancies.

**Upper Cumberland HRA Employees
Gender and Ethnicity**

Program	Gender		Ethnicity					
	Male	Female	Asian	Black	Hispanic	Indian	White	Other
Administrative	2	2	0	0	0	0	4	0
Cooks	1	29	0	1	0	0	29	0
Head Start	0	27	0	0	0	0	27	0
Homemaker	0	31	1	2	0	0	28	0
Maintenance	11	22	0	3	0	0	30	0
Mechanic	5	0	0	0	0	0	5	0
Office	25	158	0	2	0	1	180	0
Social Worker	20	15	1	0	1	0	33	0
Van Driver	68	43	0	0	1	0	110	0
Total	132	327	2	8	2	1	446	0