



TENNESSEE
ARTS
COMMISSION

Cultivate. Create. Participate.

**Title VI Compliance Report and
Implementation Plan
FY 2017**

(covers July 1, 2016 - June 30, 2017)

(modified February, 2018)

Anne B. Pope, Executive Director

Kim Johnson, Director of Arts Access and Title VI Coordinator

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2. Overview

The Tennessee Arts Commission

History & Mission

All 50 states have state arts agencies whose responsibility is to increase public access to the arts and work to ensure that every community in America enjoys the cultural, civic, economic and educational benefits of a thriving arts sector.

The Tennessee Arts Commission was created in 1967 by the Tennessee General Assembly with the special mandate to stimulate and encourage the presentation of the visual, literary, music and performing arts and to encourage public interest in the cultural heritage of Tennessee.

The mission of the Tennessee Arts Commission is *“to cultivate the arts for the benefit of all Tennesseans and their communities.”* Through a variety of investments, the Commission encourages excellence in artistic expression through the state's artists, arts organizations, and arts activities. That commitment has expanded through the years to increase access and opportunities for all citizens to participate in the arts.

The Tennessee Arts Commission builds better communities by:

- *Investing in Tennessee's nonprofit arts industry to enhance cultural life*
- *Serving citizens, artists and arts and cultural organizations*
- *Supporting arts education to increase student outcomes*
- *Undertaking initiatives that address public needs through the arts*

Each year the Commission conducts competitive grant making activities open to nonprofit, chartered-in-Tennessee organizations, and entities presenting arts events and activities. Annually, the Commission helps fund the arts activities of more than 600 organizations and artists in Tennessee through the awarding of grants in the areas of Arts Access (a category specifically focused on providing support for arts projects to arts organizations of color, people with disabilities, and senior adults), Arts Project Support in rural and urban areas, Partnership Support, Major Cultural Institutions, Community Educational Partnerships, Arts Build Communities, Touring Grants, Individual Artist Fellowships, Professional Development Support, Technical Assistance, Creative Placemaking, and a variety of Arts Education Grants including Student Ticket Subsidy, Arts 360, and Teacher Training.

Strategic Plan

The 2014-2019 Strategic Plan builds on extensive input from stakeholders and the public and includes mission, values, tools and five major goals for a long range future. The plan was developed through a series of public meetings, surveys, and public comment. Strategies reflect a more immediate timeframe and will be updated over the years as conditions change and new opportunities emerge. The official period for the plan is November 1, 2014 through September 30, 2019. These goals are:

1. *Thriving Tennessee Arts and Culture*
2. *Arts as Engines of Growth and Vitality*
3. *Arts Essential to Learning*
4. *A Champion for the Arts*
5. *Effective and Accountable Agency*

It is worth noting that two of the strategies developed to implement Goal 1 are as follows:

2. **Preserve and promote Tennessee’s heritage, cultural diversity and folk arts.**
 - a. *Identify, document and promote Tennessee folk artists, community traditions, folklife practices and traditional arts, including both older rooted traditions and those of more recent ethnic and immigrant communities.*
 - b. *Increase public awareness of and scholarly access to the wealth of Tennessee folklife program archival records.*
3. **Expand accessibility, participation, and inclusion in the arts for all Tennesseans.**
 - a. *Define opportunities and target support for underserved communities.*
 - b. *Research and share best practices for audience development, including underserved communities.*
 - c. *Increase arts participation opportunities, including for persons with disabilities.*

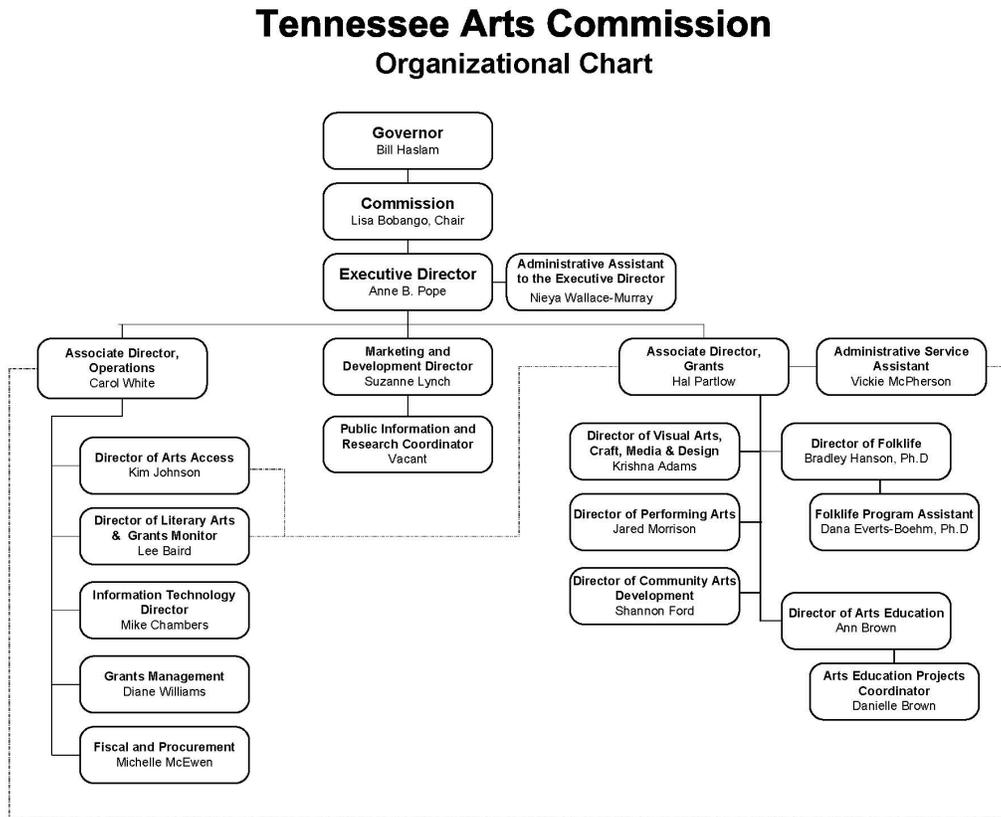
Commission Members

The Governor appoints fifteen (15) volunteer members to the Tennessee Arts Commission for five-year terms. As requested in this plan’s instructions, more information about the members is listed in this document under “Boards and Advisory Bodies” on page 27.

Commission Staffing

The Commission is staffed by 18 employees and led by Executive Director, Anne B. Pope (see Figure 1).

Figure 1



June 30, 2017

3. Responsible Officials

Anne B. Pope is the Commission's Executive Director and is responsible for its operation and compliance. Kim Johnson is the Director of Arts Access and the Title VI Coordinator who reports to Carol White, Associate Director of Operations. The Title VI Coordinator is responsible for the development and drafting of the agency's Implementation Plan.

The Tennessee Arts Commission offices are located at 401 Charlotte Avenue, Nashville, TN 37243 (615-741-1701).

Signatures:

Anne B. Pope, Executive Director
Tennessee Arts Commission

Kim Johnson, Director of Arts
Access/Title VI Coordinator
Tennessee Arts Commission

4. Definitions

Advisory Panel or Panel - Individual citizens throughout the state, who are nominated or self-nominated, that serve in reviewing grant applications in a specific artistic discipline or grants program area. Advisory panel members are selected based on geography, gender, race, and professional and/or arts area expertise. They may serve up to three (3) consecutive two (2) year terms and in FY17, there were seventeen (17) panels and one (1) inter-board committee.

Arts Access - The Arts Access program is committed to providing access and funding grants in the arts to Tennessee's under-represented constituents, including people of color (Black/African American, Asian, Native Hawaiian/Pacific Islander, Native American/Alaska Native and people of Hispanic or Latino ethnicities), people with disabilities, and people who are over 65 years of age or older.

Beneficiary - Individual grant recipients (i.e., individual artist or arts administrators) or arts program participants or audience members that directly or indirectly receive an advantage through the operation of a federal or state program and are not required to comply with Title VI.

Commission or the Commission - The Tennessee Arts Commission

Commission Member - A member of the Tennessee Arts Commission's governing board who is appointed by the governor.

Compliance - The act of conformity in fulfilling official requirements.

Creative Placemaking - An initiative by the Commission funded through a grants competition designed to help build stronger communities through the arts to enhance the distinctive character of local Tennessee places for positive economic and community outcomes.

Designated Agency (DA) - A regional arts organization, council, or development district whose mission includes arts-focused activities and funding. DA's specifically assist the Commission in administering the local or regional ABC (Arts Build Communities) grant, convening its panels, and tracking the success of these funded grantee activities. Currently there are thirteen (13) designated agencies throughout Tennessee.

Discrimination - To make a difference or distinction in the treatment of or services provided to an individual or group, based on their race, color or national origin.

DocuSign - An electronic signature and digital transaction management service for facilitating electronic exchanges of contracts and signed documents.

eGrant - The database system utilized by applicants and subrecipients/grantees where applications and Title VI training and certification can be submitted on-line.

Executive Director - The chief managerial and/or administrative officer of the Tennessee Arts Commission.

FLUXX or online grants management system - An online grants management system that manages all stages of grant processes. This new system launched in November, 2016 for the TN Arts Commission.

Grantee - Contracted nonprofit, 501 (c) (3) organizations, governmental entity, public or private school or individual receiving funds from the Tennessee Arts Commission.

Inter-board Committee - A committee whose existence and charge come from the Commission, regardless of whether Commission members sit on the committee, and have a task to achieve a stated mission and/or purpose.

NEA- National Endowment for the Arts, a federal agency currently funding the Tennessee Arts Commission.

Program Directors - Tennessee Arts Commission staff assigned to administer specific arts program areas.

Sub-recipients - Federal and state funded recipients of the Commission's assistance/goods including contracted nonprofits, 501 (c) (3) organizations, governmental entities, and universities or schools. Often referred to as grantees.

Suspension of Funds - To temporarily discontinue the distribution of funds from the Tennessee Arts Commission.

State - State of Tennessee

TDOE - Tennessee Department of Education

THRC- Tennessee Human Rights Commission

Termination of Funds - Permanently end or discontinue funds from the Tennessee Arts Commission.

The Commission's Title VI Coordinator or Coordinator- Staff person designated by the Executive Director of the Tennessee Arts Commission, who serves as Title VI Coordinator for the agency.

Traditional Arts Apprenticeship Program or (TAAP) - An initiative designed to encourage the survival, continued development, and proliferation of our state's diverse folklife traditions, especially those that are rare or endangered.

5. Non-Discrimination Policy

The Tennessee Arts Commission's policy on non-discrimination is located on the agency's website, <http://tnartscommission.org/about-us/title-vi/>, and is available for the general public to view including subrecipients, contractors, and vendors. It reads as follows:

No person on the basis of race, color, national origin, disability, age, religion, or sex shall be excluded from participation in, or be denied benefits of, or otherwise be subject to discrimination of services, programs, and employment provided by the Tennessee Arts Commission and its contracting agencies.

A formal statement on non-discrimination is also included in the Rules of the Tennessee Arts Commission Chapter 0140-1-03.c.2. for grant applicants at this link: <http://share.tn.gov/sos/rules/0140/0140.htm>

To be eligible, an applicant must comply with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1971, the Age Discrimination Act of 1975, the Drug-Free Workplace Act of 1988, and where applicable, Title IX of the Education Amendments of 1972. Title VI and Section 504 bar discrimination on the basis of race, color, national origin, or personal handicap in federally assisted projects. The Drug-Free Workplace Act of 1988 requires that recipients of Federal grants certify that they will provide a drug-free work place. Title IX prohibits discrimination on the basis of sex in federally assisted education programs and activities. Requests for information pertinent to these laws should be addressed to the Tennessee Arts Commission.

The Tennessee Arts Commission, its subrecipients, and/or contractors shall make any compliance report available upon request to the Tennessee Human Rights Commission.

6. Civil Rights Office

The Tennessee Arts Commission does not have a Civil Rights Office, but the Director of Arts Access serves as the agency's Title VI Coordinator and is identified as such on the Title VI page of the Commission's website <http://tnartscommission.org/about-us/title-vi/> and on the Title VI posters. Constituents are advised to contact the Commission's Director of Arts Access/Title VI Coordinator for additional information or to discuss issues relating to Title VI.

Overall activities related to the enforcement of Title VI are the responsibility of the agency's Coordinator, but three (3) other staff also work directly with the Coordinator regarding Title VI issues. With support from the Associate Director of Operations, the Coordinator provides training, manages data collection, answers most agency and in-house inquiries, distributes information, and provides resources to the staff and constituents. One of the major enforcement activities is to initiate reports to determine sub recipient/grantee compliance with Title VI training at key deadlines and follow-up with those subrecipients who have failed to meet those deadlines. Two positions, the Grants Manager and Grants Analyst, are responsible for monitoring grants in general, including Title VI compliance. On the recommendation of the Associate Director of Operations and the Title VI Coordinator, these two positions provide additional special focus monitoring for Title VI and other issues related to grant compliance when necessary. For example, the Grants Manager ensures that no payment is released until the subrecipient/grantee has submitted a Title VI training form.

7. Discriminatory Practices

The Commission intentionally chooses a positive, proactive approach to Title VI by providing examples of inclusion and nondiscriminatory practice on [publications](#), [poster](#) and [website](#). This material is available to all sub recipients though the website and is available to anyone who requests copies from the Commission. Some of the examples of inclusion are:

- Providing opportunities for services and benefits in arts programming regardless of a person's race, color or national origin;
- Diversifying performance venues, arts programs, classrooms and audiences;
- Including individuals with diverse ethnic backgrounds on planning or governing boards;
- Title VI posters with text in both English and Spanish (*see Appendix A*).

Specific examples of discrimination in the arts relating to Title VI are:

- Segregation or separate treatment of individuals or groups due to their race, color or national origin in any arts program or activity including performances, auditions, classes and exhibitions;
- Different standards or requirements for participation in the same grant category, arts program or activity because of the organization's stated race, color or national origin;
- Denying access to performance, festivals, classrooms or exhibitions based on a person's race, color or national origin;
- Denying funding to an organization based upon its members' race, color or national origin.

8. Federal Programs or Activities

The Tennessee Arts Commission has the following schedule of financial assistance (*see Appendix J*):

Figure 2

Schedule of Federal Assistance
Tennessee Arts Commission

#	Grantor Name	Program Name	Grant Period	Other Identifying #	Notes	\$Funding Amount
1	National Endowment for the Arts	NEA Partnership Grant – CFDA 45.025	7/1/2016-6/30/2017	16-6100-2007	1-1 Match Required	\$799,900
		<i>General Partnership, which includes \$20,000 for Poetry Out Loud</i>				\$609,100
		<i>Arts Education</i>				\$ 60,500
		<i>Underserved Communities</i>				\$ 94,300
		<i>Folk arts Partnership</i>				\$ 30,000
		NEA Creativity Connects Roundtable(s),non-matching				\$ 6,000
						\$799,900
						Total FFA
#	Grantor Name	Program Name	Grant Period	Other Identifying #	Notes	\$Funding Amount
2	National Endowment for the Arts	NEA Partnership Grant – CFDA 45.025	7/1/2017-6/30/2018	17-6100-2009	1-1 Match Required	\$781,900
		<i>General Partnership, which includes \$17,500 for Poetry Out Loud</i>				\$601,600
		<i>Arts Education</i>				\$ 60,200
		<i>Underserved Communities</i>				\$ 93,700
		<i>Folk arts Partnership</i>				\$ 26,400
						\$781,900
						Total FFA

9. Data Collection and Analysis

Agency Data Collection

The Commission uses the National Standard for Arts Information Exchange (required by the NEA) to collect racial and other data on its subrecipients through the application process. The National Standard lists the following codes for collecting diversity data on boards, audiences, and projects from subrecipients/grantees:

- A- Asian
- B- Black/African American
- H- Hispanic/Latino
- N- Native American/Alaska Native
- P- Native Hawaiian/Pacific Islander
- W- White
- 99-No single group

For FY17, the Commission awarded approximately 745 contracts to the following subrecipients and three (3) vendors (*see Appendix B*). Grant subrecipients included:

- Federal 501(c) 3 tax-exempt nonprofit arts and non-arts organizations
- Governmental organizations including units of government, schools, colleges, and universities
- Professional individual artists, arts administrators and educators

The Commission collects this vital NEA information on each of its subrecipients through the initial application process and in the final grant evaluations data. In the application process, subrecipients are required to provide race/diversity data on its board, projected audience, county demographics, and provide an organizational statement on accessibility efforts which includes reaching people of color (*see Appendix A for a copy of a grant application*). In the final grant evaluations, subrecipients report data on the race/ethnicity of the populations that benefitted from the project and provide a narrative statement of how their project was accessible for underserved constituents including people of color (*see Appendix A for a copy of a grant evaluations form*).

Racial & Ethnic Data on Sub Recipients, Vendors, and Beneficiaries

Each year, the Commission funds different subrecipients, individuals, and vendors through contracts. The Tennessee Arts Commission on a yearly basis uses very few vendors outside the Department of General Services statewide procurement contracts. In FY17, only three (3) vendors were contracted and none are classified as minority groups as defined by NEA standards (*see Appendix B*). Please note that the State of Tennessee changed its procurement policy for contractors. In years past, every fee-for-service activity no matter how small had to have a contract, but the new policy states that contracts are not needed if the procurement is once in a 90 day period, cost is less than \$50,000 and the procurement usage is very specific. Please refer to this policy at https://stateoftennessee.formstack.com/forms/procurement_decisiontree Since many of the contractors that the Commission previously used do not need contracts under this new policy and since contracts were the place where racial data was previously collected, this new policy has impacted the information gathered from this group.

As for subrecipients of grant funding, Appendix B contains the majority racial and ethnic composition of each sub recipient organization. Of 745 subrecipients/grantees, 14% were considered minority organizations.

The Tennessee Arts Commission also collects racial and ethnic information on its beneficiaries and reports it annually to the National Endowment for the Arts. This information is given first as an estimate of populations to be served in applications and last as part of the final evaluations process where actual numbers of beneficiaries served including racial and ethnic data are collected. This information from the final evaluations is included in Appendix B.

Racial Data on Commission Staff

The Commission currently has 19 staff positions. Twenty-one percent (21%), or four (4) African Americans on staff, have self-identified as belonging to a minority group (*see Figure 3*).

Figure 3- Tennessee Art Commission Staff Chart (as of 6/30/17)

EEO Detail

TENNESSEE ARTS COMMISSION

ID#	Position	Ethnic Category	Executive/Preferred
5048	TAC-DIRECTOR	W	Executive

5049	TAC PROGRAM DIRECTOR	W	Preferred
5050	TAC PROGRAM DIRECTOR	B	Executive
5051	ADMIN SERVICES ASSISTANT 3	B	Preferred
5052	ADMIN SERVICES ASSISTANT 2*	Vacant	Executive
5057	TAC ASSISTANT DIR	W	Executive
5058	TAC ASSISTANT DIR	W	Executive
5066	TAC PROGRAM DIRECTOR	W	Executive
5072	TAC PROGRAM DIRECTOR	W	Executive
5073	ADMIN SERVICES ASSISTANT 3	W	Preferred
5074	TAC PROGRAM DIRECTOR	W	Executive
5075	EXECUTIVE ADMIN ASSISTANT 3	W	Executive
69105	GRANTS ANALYST 2*	B	Preferred
73543	TAC PROGRAM DIRECTOR	W	Executive
74883	ADMIN ASSISTANT 3	B	Executive
100566	TAC PROGRAM DIRECTOR	W	Executive
101680	INFO RESOURCE SUPPORT SPEC 4	W	Executive
119069	TAC PROGRAM DIRECTOR	W	Preferred
1000053	TAC PROGRAM COORDINATOR	W	Preferred
	Total:	19 staff	

10. Limited English Proficiency (LEP)

Language Assistance Plan

The Tennessee Arts Commission's policy of non-discrimination covers its intent to provide interpretative and translation services to subrecipients and individuals. Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff are aware of this policy and procedure, and staff is trained annually in how to effectively assist LEP individuals in effective communication techniques, including how to access an interpreter. Also, the Commission's website has translation services which allow the entire website to be translated into many different languages.

To assist LEP individuals, all Commission staff is trained to use AVAZA language services in the event of translation needs arising from speakers of other languages and/or if the Folklife Assistant, who is fluent in speaking and writing Spanish, is not available. The procedure for identifying LEP

individuals includes promptly identifying the language and communication needs of the LEP person. If necessary, staff will use a language identification card or posters which are located in public areas to determine the language needed. To obtain a qualified interpreter through AVAZA, staff has been trained to use the agency's telephone line which is 615-534-3400, and the hours of availability are 24 hours/day 7 days a week. The required access code is 37409 which is listed on the posters.

Translator and interpreter services

To date, Spanish is the primary language that the Commission has needed to translate or interpret. To assist with LEP services, the Commission's Folklife Assistant proactively expanded participation from Spanish speaking constituents/organizations throughout the state. She regularly assisted constituents in Spanish over the phone, in emails, and in person (*see Figure 4 below for a log of those transactions*). For written translation services, the Folklife Assistant was able to do some emails, letters, and forms, but AVAZA is also available as a resource for the Commission to translate larger, written documents into Spanish. When translation of vital documents is needed, each staff person in the Tennessee Arts Commission submits documents for translation to the agency's Title VI Coordinator.

In FY2017, the Commission was trained to use the following translation and interpreter services to meet its needs:

List of Translators/ Interpreters

AVAZA Language Services Corp (state contractor)

5209 Linbar Drive, Suite 603

Nashville, TN 37211

Contact: Josh Murray, Chief Business Development Officer

j.murray@avaza.com

615-534-3404 (language accessibility line)

(615) 212-3034 (Josh' phone)

Dana Everts-Boehm, Folklife Assistant*

Tennessee Arts Commission

401 Charlotte Ave

Nashville, TN 37243

615-532-0169

Email: dana.everts-boehm@tn.gov

(*As of 7/1/2017, Dr. Everts-Boehm retired from the Commission.)

Kim Johnson, Director of Arts Access & Title VI Coordinator, is responsible for accessing and coordinating all language needs for the Commission.

Documents available in other languages

The Commission will continue to take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in its services, activities, programs and other benefits. The policy of the Tennessee Arts Commission is to ensure meaningful communication with persons who experience LEP. This policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights and consent forms, grant guidelines, applications, and all other applicable documents. [Review factors found in State of Tennessee Title VI Policy Guidance #11-02 and U.S. Department of Justice Guidance on LEP dated June 18, 2002 to determine applicability of written translation requirements]. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served. When translation of vital documents is needed, each area in the Tennessee Arts Commission will submit documents for translation into the Commission's Title VI Coordinator.

Documents that are available in other languages include:

- Title VI posters with text written in both Spanish and English (*see Appendix A for a copy of the poster*).
- Emails and applications translated by the Folklife Assistant to respond to subrecipient requests (*see Appendix C for examples*)
- In FY17, the Folklife department within the Tennessee Arts Commission started a "Traditional Arts Apprenticeship Program (TAAP)" which enables the survival, continued development and proliferation of our state's diverse folklife traditions, especially those that are rare or endangered. Many of these traditions are rooted in diverse ethnic populations in the state. To ensure that these applications are readily available to people who speak and write Spanish, a written translation of the application is available (*see Appendix C*).

List of Limited English Proficiency (LEP) Encounters

During FY2017, the Commission encountered an estimate of 21 people who came into the Commission office and/or were visited during fieldwork, 38 phone calls, and 59 written communications (includes letters and emails) that needed Spanish translation services. The Commission's Folklife

Assistant, Dana Everts-Boehm, was able to assist in all of these encounters since she speaks and writes fluent Spanish. All encounters were for Spanish (see Figure 4). Also, due to the unique work of the Commission, program staff frequently attended grantee programs such as festivals, exhibits, cultural activities and conferences. During the last fiscal year, approximately 74 people had conversations in Spanish with Dana at these types of events.

Figure 4
Tennessee Arts Commission
FY2017 Language Encounters

Language encounters	# of in-person encounters per year (walk-in visits to TAC, site visits, interviews with folk artists, etc.)	# of written (emails or letters) encounters per year	# of phone encounters per year	# of field work conversations about TAC in other languages (Spanish)
Spanish	21	59	38	74
Totals: 1 language	21	59	38	74

11. COMPLAINT PROCEDURES

It is the policy of the Commission that in the event of a formal complaint, the following procedure will apply:

Filing Process

1. Complaints made to the Commission are routed to the Title VI Coordinator where a written Title VI complaint form is completed. The Title VI complaint form is located on the agency's website. *(See Appendix D for a copy of the complaint forms.)*
2. The Title VI Coordinator reports complaint information to the agency's Executive Director and Associate Directors within 24 hours and to THRC within ten (10) days of receiving the complaint using THRC's Complaint Notification Form.
3. The Title VI Coordinator is responsible for acknowledging and starting the investigation of the complaint within thirty (30) days of its receipt.

4. The Title VI Coordinator will conduct an investigation and create an investigative summary report.
5. Before a formal summary and/or proposed action is released to the complainant, the Title VI Coordinator will notify and share the summary with the agency’s Executive Director, Associate Directors, and THRC.
6. The Title VI Coordinator will notify the complainant in writing the results of the investigation.

Total number of complaints

In FY17, the Commission received no formal Title VI complaints. Also, there were no lawsuits filed alleging discrimination on the basis of race, color or national origin under any federally funded program or activity (see Figure 4).

Figure 4

Tennessee Arts Commission FY 2017				
Total # of Title VI complaints for FY 2017				0
Total # of Title VI complaints dismissed or withdrawn				0
Total # of Title VI lawsuits for FY2017				0
		Total		0

Copies of Complaint Forms

Complaint forms, withdrawal of complaint forms, the complaint log, appeals form and a copy of the last Title VI Implementation Plan are located on the agency’s website (*see Appendix D for copies of all complaint forms*).

12. Title VI Training

The Commission had 18 staff members (one (1) vacant position) who received training in FY17. Staff received training by the Title VI Coordinator in the Commission’s conference room, 401 Charlotte Ave, Nashville TN on May 23, 2017 (*Appendix E contains all training materials used*). One hundred percent (100%) of the current staff has been trained and the Title VI

Coordinator will provide training to new employees as part of their orientation process.

The Title VI training for staff was broken into three (3) parts: ADA/504 compliance, Title VI, and LEP as reflected on the agenda. The training served as an interactive review of timelines, expectations of grantees on Title VI, what to do when LEP individuals need language accessibility, and how to ensure good experiences for people with disabilities.

In FY2017, the Tennessee Arts Commission transitioned to a new online grants managements system called FLUXX. Depending of what type of grant was awarded, some subrecipients/grants were required to conduct Title VI training through the old database system, eGrant, and some grants through the new on-line system, FLUXX. Information on how to submit Title VI was widely communicated through instructions over our website, eNewsletters, and in the FLUXX system itself. In FY17, 100% of subrecipients/grantees conducted on-line Title VI training through one of these two systems (*see Appendix F for a list of FY17 training by sub recipients*).

The Title VI on-line training module for subrecipients/grantees was loaded into our eGrant and FLUXX systems where grantees could log-on and conduct the training. Training records are maintained by the Title VI Coordinator and by our information systems personnel. The on-line training covers general information about Title VI and is available in three different modules:

- Module I: a power point and video combination which lasts about 15 minutes total;
- Module II: a three (3) part video series which each video lasting approximately seven (7) minutes in length and provides a comprehensive overview of Title VI with closed captioning available;
- Module III: video with a brief overview lasting 10 minutes.

Supplemental materials can be used for boards, volunteers, and others who need the basic information but don't have access to the other training materials.

13. Subrecipient Monitoring

Description of the Agency's Policy and Procedures related to Compliance

As part of the application process, each applicant (potential subrecipient) for FY17 was required to sign a Statement of Assurances (*see Appendix G for a copy of assurances*) that certifies its compliance or designates its intent to “take any measures necessary” for compliance with Title VI of the Civil Rights Act of 1964 and other applicable state and federal laws and statutes regarding the use of public funds. The Statement of Assurances must be signed by two different authorized members of the organization, usually the Board Chairperson or President of the organization and the specific project director. Applicants are required to sign and submit a Statement of Assurances with every grant application. Contractors who complete the formal competitive procurement process also sign a Statement of Assurances for compliance.

Contracts are issued to all subrecipients and must be signed by a duly authorized representative of the organization. Each contract clearly states an applicant organization’s obligation to comply with applicable Federal and State laws. As stated in those contracts, subrecipients (section D.10 of the contract) are prohibited from engaging in discriminatory practices as stated: *“The Grantee agrees that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract or in the employment practices of the Grantee on the grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by Federal, Tennessee State constitutional, or statutory law. The Grantee shall, upon request, show proof of such nondiscrimination and shall post in conspicuous places, available to all employees and applicants, notices of nondiscrimination.”*(See Appendix G for a copy of this contract.)

Pre-Award Procedures

For FY17, applicants (potential subrecipients) in the pre-award phase were required to provide racial data in the areas of board, programs, services, and projected populations to be served. Each applicant completes an “accessibility statement” of how underserved populations will participate in their programs as artists and audience members. Applicants must also explain how their marketing and publicity plans will reach the targeted audience through mechanisms like print ads, radio, TV promotions, and other methods that reach people of color and other underserved populations. In addition, applicants provide copies of their print publicity materials that include their statements of non-discrimination and plans for distribution. Panel members use this and other information provided by the

organization to evaluate and rate the application (*see copy of grant application in Appendix A*). Last, each applicant is rated on their compliance history (including Title VI compliance) with the Tennessee Arts Commission and failure to meet compliance measures can result in not being funded.

Although vendors/suppliers (*the state has changed its language from vendors to suppliers*) do not go through the same pre-award process as subrecipients, the Commission's staff is always culturally and ethnically sensitive to needs of its constituents when selecting suppliers. The Commission polls colleagues (nationwide) and constituents, attend conferences, training workshops and programmatic events, and check references to assist in soliciting bids and selecting potential contractors. A list of vendors/suppliers for FY17 is listed in Appendix B.

Post-Award Procedures

In FY17, once grant amounts were approved by the Commission board, grant awards were announced in email letters and a contract sent to funded organizations. Included with the contract letter were instructions on how to complete compliance for Title VI training (*see Appendix H*) and the deadline for submitting Title VI training for each type of grant. Grantees signed and returned the contract which includes standard Title VI compliance language.

Throughout the year, the Title VI Coordinator is responsible for ensuring that grantees are in compliance with Title VI training in accordance with the deadlines associated with each grant type and/or before any funds are released to grantees. After sub-recipients/grantees are awarded funding, the Title VI Coordinator with assistance from the Director of Grants Management who processes requests for payments, work in tandem to ensure that no organization receives grant funds from the Commission without the Title VI training requirement being met first. In FY17, the Director of Grants would bring to the attention of the Title VI Coordinator any sub-recipient who was trying to request a funds payment and was not in compliance with Title VI. The Title VI Coordinator or Director of Grants would then contact the sub-recipient/grantee to remind them of Title VI compliance and/or to provide technical assistance. Also, the Title VI Coordinator would monitor the completion of Title VI compliance from sub-recipients according to timelines established by the agency. For example, in FY17, annual grant recipients had a deadline of December 16th and rolling grants were required to complete Title VI upon completion of contract and before payments were disbursed. Each grant was monitored according to these timelines and reviewed by the Title VI Coordinator for compliance.

After each Title VI training form is complete, the Title VI Coordinator reviews the information to ensure that Title VI training modules have been viewed; reviews the staff who has gone through training; and the percentage of staff that has gone through training.

Also during the year, the Grants Analyst is responsible for subrecipient monitoring and implementation of the agency plan pursuant to Department of General Services Policy 2013-007. That position monitored 78 grant contracts in FY17 which checked on several factors within the actual operations of a sub-recipient/grantee which included minimum Title VI compliance standards like having Title VI posters visible to the public. Since on-site reviews are not always feasible, this monitoring by the Grants Analyst also included phone conversations, fax transmissions, grant folder reviews and e-mails.

Subrecipient Title VI Training

For FY17, subrecipients/grantees of the Tennessee Arts Commission were required to conduct on-line Title VI training through either the eGrant or FLUXX system depending on the grant type. Contracts were mailed June 1, 2016 with detailed instructions on submitting FY17 Title VI training requirements. Subrecipients/annual grantees had until their first request for payment or no later than December 16, 2016, whichever came first to submit their FY17 Title VI form. Grant funds were withheld until the subrecipient/grantee's Title VI training requirements were met. At the end of FY17, 100% of Annual and Rolling grantees were in compliance with Title VI training (*see Appendix H for a copy of FY17 instructions*).

Procedures for Noncompliance

- I. **Processing** - Each year, the dates of when each Title VI training certification is due for each type of grant is communicated. By December of each year, the Title VI Coordinator requests a report of subrecipients not in compliance with Title VI training and certification requirements. For those subrecipients, the Title VI Coordinator initiates communication through emails and phone calls to voluntarily increase training compliance with Title VI.
- II. **Reporting** - For organizations not in compliance with Title VI, this is reported at the advisory panel review meeting, the Arts Commission's Audit Committee and at Commission meetings. Based on noncompliance, future funding for these organizations is jeopardized.

- III. **Resolution** -By the end of January 2017, 100% of subrecipient/grantees were in compliance with Title VI (*see Appendix F*).
- IV. **Enforcement of corrective actions** - The TN Arts Commission staff works to ensure that no payments are released to organizations not in compliance with Title VI. The Title VI Coordinator and Director of Grants Management, who pre-audits requests for payments, works in tandem to cross-check and ensure each subrecipient is in compliance with Title VI before payments are released.
- V. **Monitoring of programs** - The Title VI Coordinator is responsible for constantly monitoring Title VI compliance for subrecipients for any given fiscal year in accordance with deadlines established by the Commission. Monitoring includes ensuring training compliance, providing assistance to subrecipients, and also the Grants Analyst visits subrecipients and does some verification of Title VI compliance.
- VI. **Sanctions** - In the rare situation where a subrecipient/grantee is noncompliant after attempts are made for voluntary compliance, an organization that fails to meet any contract requirements including compliance with Title VI can result in termination of the grant award (*see contract in Appendix H*).

Identify Subrecipients

Subrecipients/grantees are funded within grant categories by the Commission which reflect an arts discipline or population that is served. The grant areas are as follows and all subrecipients are aligned within these grant categories:

AA	Arts Access Annual Grant
AA - MG	Arts Access Mini Grant
AE - AI	Arts Education - Arts360 Arts Integration
AE - CL	Arts Education - Community Learning
AE - FAY	Arts Education - Funds for At-Risk Youth
AE - MG	Arts Education - Mini Grant
AE - TI	Arts Education - Teacher Incentive
AE - TT	Arts Education - Teacher Training
APS	Arts Project Support
CEP	Community Education Partnership
CI	Commission Initiatives
CP	Creative Placemaking
DA - ABC	Designed Agency (Arts Build Communities)
IAF	Individual Artist Fellowship
LINEIT	Direct state budget appropriations
RAPS	Rural Arts Project Support

PDS	Professional Development Support
PS	Partnership Support
MCI	Major Cultural Institutions
SPECOP	Special Opportunities
STS	Student Ticket Subsidy
TA	Technical Assistance
TAAP	Traditional Arts Apprenticeship Program
TOUR	Touring Grant

A listing of sub recipients/grantees and vendors for FY17 is found in Appendix B which shows the Commission awarded approximately 745 grants in the above categories to subrecipients and three (3) contracts to vendors.

14. Public Notice and Outreach

The Tennessee Arts Commission uses a variety of methods and procedures for the dissemination of information to the public on its nondiscrimination policies which includes the use of Title VI posters, its website, eNewsletters, and grants workshops.

- I. **Non-discrimination Policy** - The Commission's website, all contracts, and Title VI posters state the agency's non-discrimination policy.
- II. **Programs and Services** - Some of the ways in which the Commission disseminates its information on programs and services include:
 - Grants Workshops - In FY17, five (5) workshops were held in different areas of the State and notices about these workshops were widely announced through local newspapers; emails, the agency's website, and database (*see Attachment H for copies of these notices*).
 - The Commission's website contains all information about its grants, programs, and services.
 - On a daily basis, Commission staff talks to individuals/public by email and phone about programs, services, and grants.
- III. **Complaint Procedures** -The latest Title VI Implementation Plan which has the complaint procedure listed is located on the Commission's website at https://issuu.com/tnarts/docs/title_vi_implementation_plan_fy16.d.
- IV. The website also provides the contact information for the Director of Arts Access/Title VI Coordinator if a person believes they have been

subjected to discrimination. All complaint forms are located on the website as well (*see Appendix D*).

IV. **Minority Participation on planning boards and advisory bodies**

The Commission, the agency's governing board appointed by the Governor, includes participation from people of color and the Commission works closely on planning with the agency staff. In FY17, two (2) of the 15 Commission members were African American and the remaining members are White. The current list of [Commissioners](#) is posted on our website.

In FY17, the Commission held seventeen (17) advisory panels and one (1) inter-board committee that reviewed and evaluated grant applications. Panelists also serve as year-round resources to the staff and as advocates for the arts in their communities. Currently there are panels for Arts Access, Arts Education, Community Arts Development, Creative Placemaking, Dance, Folklife, Inter Arts, Literary, Music, Theater, Rural Arts Project Support, and Visual Arts, Craft, Media and Design. The categories of Major Cultural Institutions and Cultural Educational Partnerships are reviewed by out-of-state adjudicators.

To select members for the Advisory Panels, nominations are solicited statewide and can be received as self-nominations or from other individuals. Information about the role of advisory panels and nomination forms is found on the Commission's website year-round at <http://tnartscommission.org/app-review-process/>. Panelists are recruited who represent diversity in gender, geographic area, race, and professional and/or arts area expertise. Panelists may serve up to three (3) consecutive two-year (2) terms. Most panels have representation from persons of color unless members are absent from the meeting, rotate off the panel or decline invitations to participate. In FY17, there were 83 review panelists of whom 31% were persons of color and on the one (1) inter-board committee, 14% of its members were people of color (*see Appendix B under "Advisory Panels"*).

Other methods utilized to disseminate information

In FY17, public outreach was facilitated by the Commission via the following procedures:

1. The Commission's Title VI Implementation Plan and non-discrimination policy is available on [the website](#) and [printed material](#).

2. The Commission has a [Title VI poster](#) with both Spanish and English text that is available to current grantees (*see Appendix A*). The poster provides information on who to contact within the agency for information or to file a Title VI complaint. The poster is distributed at various workshops, meetings and conferences and is also available online. The Commission receives and fills requests for the poster from arts and non-arts organizations as well as potential grantees.
3. Grant information, program notifications, and opportunities for participation in regional and national events are distributed weekly to 2000+ subscribers of *Arts Online*, the agency's on-line newsletter and through e-blasts.
4. The Commission has over 200+ media contacts and approximately 2% are organizations of color.
5. Upon request, the Commission staff provides one-on-one consultations to any [constituent\(s\) or group\(s\)](#). Staff members attend arts and community events to distribute Commission information.
6. The Commission's staff also conducts general meetings and workshops in and away from the office to promote our programs and increase participation.
7. The [Arts Access program](#) prioritizes underserved/underrepresented people and organizations whose mission is to increase access specifically to ethnic groups, people with disabilities, and older adults. The program provides programmatic, administrative and technical assistance support.
8. The agencies grant guidelines and application forms are posted on our web site and/or distributed electronically.
9. For the few contracts that are publicly bid, the Commission compiles a list of potential contractors to whom a solicitation for bids is sent, including all "minority, disadvantaged, and small businesses" identified by or known to the contracting agency as having the ability to deliver the subject service. In addition, the solicitation is provided to the Department of General Services Central Procurement Office for posting on the internet at <http://tn.gov/generalservices/article/request-for-proposals-rfp-opportunities>.

Title VI posters are available and used by many subrecipients/grantees to disseminate information about Title VI. These posters are visible in subrecipient/grantee office locations, at program events, festivals, and other places where the public is attending an arts program funded by the Tennessee Arts Commission (*see Appendix A for a copy of the poster*).

Boards and Advisory Bodies

The Tennessee Arts Commission Members

Tennessee Code Annotated 4-20-104 & 107 provide that the duties of the Tennessee Arts Commission and therefore its commission members are to:

- Stimulate and encourage throughout the state the study and presentation of the performing, visual and literary arts and public participation therein;
- Encourage participation in, appreciation of, and education in the arts to meet the legitimate needs and aspirations of persons in all parts of the state;
- Encourage public interest in the cultural heritage of our state, to expand the state's cultural resources and to promote the use of art in the state government's activities and facilities;
- Encourage excellence and assist freedom of artistic expression essential for the well-being of artists.
- Undertake to assure equitable participation by the traditionally underserved and underrepresented ethnic minority, people with a disability, elderly and rural artists and arts organizations.

The impact of commission decisions on the public and agency are demonstrated through a variety of investments in which the Tennessee Arts Commission builds better communities by:

- Investing in Tennessee's nonprofit arts and cultural life by funding, on average, over 700 grants annually to artists, schools, and nonprofit organizations in all 95 Tennessee counties;
- Serving citizens, artists, and arts and cultural organizations through grant funded programs that reach hundreds of students, seniors, underserved populations, people with disability, individual artists, and nonprofit organizations that directly provide arts activities and programs to residents in Tennessee;
- Supporting arts education to increase student outcomes through support of art field trips, arts integrated learning, and professional development for teachers; and
- Undertaking initiatives like the FY17 Creative Placemaking grants competition that address public needs through the arts.

The Governor appoints the fifteen (15) volunteer members of the Tennessee Arts Commission for five-year terms, selecting from among citizens who have demonstrated a vital interest in the arts. The racial/ethnic make-up of the Commission members is listed in Figure 5.

Figure 5 - Tennessee Arts Commission Members

TENNESSEE ARTS COMMISSION COMMISSION MEMBERS	
Cindy Ogle - District 1	Mary Donnet Johnson - District 5
Hank Dye - District 2	Stephanie B. Conner - District 5
Steve Bailey - District 2	Leo McGee - District 6*
Janice Ramsey - District 3	Lee D. Yeiser - District 7
Jennifer Wolfe- District 3	Shawn Pitts - District 7
Joe K. Kilgore - District 4	Patsy W. Camp - District 8
Andrea J. Loughry -District 4	Lisa Bobango - District 8
	Ritchie Bowden - District 9*

** Two (2) members are African American and thirteen (13) are White, as of 6/30/2017.*

Advisory Panels

In FY17, the Commission held seventeen (17) advisory panels and one (1) inter-board committee that met to review and evaluate grant applications. Panelists also serve as year-round resources to the staff and as advocates for the arts in their communities. Currently there are panels for Arts Access, Arts Education, Community Arts Development, Creative Placemaking, Dance, Folklife, Inter Arts, Literary, Music, Theater, Rural Arts Project Support, and Visual Arts, Craft, Media and Design. The categories of Major Cultural Institutions and Cultural Educational Partnerships are reviewed by out-of-state adjudicators.

To select panelists, nominations are solicited statewide and can be received as self-nominations or from other individuals. Information about the role of advisory panels and nomination forms is found on the Commission's website year-round at <http://tnartscommission.org/app-review-process/>. Panelists are recruited who represent gender, geographic, race, and professional and/or arts area expertise. Panelists may serve up to three consecutive two-year terms. Most panels have representation from persons of color unless members have to be absent on a review day. In FY17, there were 83 panelists in attendance of whom 31% were persons of color and on the one (1) inter-board committee, 14% of its members were people of color (see *Appendix B under "Advisory Panels"*).

Documentation of Minority Input

The Arts Commission has several opportunities to receive minority input from its subrecipients/grantees and the community. The first is through input received by Commission members who often serve on review panels throughout the state for Designated Agencies and/or community art groups. As ABC panelists, they directly participate in asking questions about diversity on an organization's board, audience, and outreach. Minutes are available from these meetings.

Second, the Commission has a bi-annual, state-wide conference to bring together arts educators, artists, cultural, non-profit organizations, grantees, and interested individuals throughout the state to learn about emerging and trending arts issues. At the 2016 conference, several workshops and topics focused on issues of cultural inclusion and diversity in the arts. Workshops like *"Addressing Racial and Cultural Diversity: Two Chattanooga Case Studies,"* *"Accessibility and Cultural Engagement,"* and *"Digging Deeper: Arts and Social Change,"* drew large attendees where feedback and exchange were key components of these discussions. Approximately 15% of the conference participants were people of color.

Third, the Commission's staff is expected to establish relationships with each subrecipient/grantee within their grant area. The staff is in constant contact with subrecipients/grantees to answer questions, provide guidance, and give direction to all aspects of the Commission's work. In this way, subrecipients/grantees and potential applicants often call upon Commission staff to assist in answering a variety of questions around issues like Title VI, best practices for involving underserved communities, and how new organizations of color can become grantees. This is especially true in the Arts Access area where organizations of color, which may be new to the grants process, can receive technical assistance in preparation for applying

to larger annual grants.

Last, the Commission implements a series of Grant Workshops annually in different regions of the state to inform the public about its processes for obtaining grants. Through the Commission's website, eNewsletter, and direct emails, the public is invited to attend. In FY17, Commission staff traveled to these regions in November 2016, and five (5) of these sessions were held throughout the state (*see Appendix H*). These meetings are designed as an exchange to share Commission updates about grant processes and other functions like Title VI plus answer questions that potential applicants and/or grantees have for Commission staff.

15. Compliance Reporting

N/A - The Tennessee Arts Commission receives funds from the National Endowment for the Arts (NEA), but this agency has no reporting requirements related to Title VI. In FY17, no federal agency required Title VI compliance reports from the Commission.

As stated above, the Commission receives NEA funds and as part of that partnership agreement, there are federal reporting requirements of which the agency is responsible. In terms of the Code of Federal Regulations (CFR), the NEA's Partnership agreement (*see Appendix G for a copy of the NEA Partnership agreement*) in Applicability 1.2 states: *These Partnership GTCs implement Title 2 of the Code of Federal Regulations (2CFR) Subtitle A - Office of Management and Budget Guidance for Grants and Agreements Part 00 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance, or Part 200) The NEA has adopted the Uniform Guidance through regulation at 2 CFR 3255.1. The Uniform Guidance complies and streamlines eight former OMB Circulars that governed Federal grants management.*

In July 2016, THRC conducted a Title VI audit of the TN Arts Commission. Only one (1) finding was documented: "The Tennessee Arts Commission did not obtain verification of Title VI training from grantees in public schools" (*see Appendix I for a copy of the Title VI Final Findings Report-2016*). To correct this finding, the Tennessee Arts Commission has implemented a process with the Tennessee Department of Education to verify that public schools are in compliance with Title VI training. The following process will be used each year:

- A. Each year between August 15-30th, the Arts Commission's Title VI Coordinator will contact the Director of the Civil Rights Office at TDOE to get a list of all school districts that are in compliance with

Title VI. This information is gained by TDOE through the “Civil Rights and Bullying Compliance Report” (of which Title VI compliance is a part) required from all school districts each year on August 1st. School districts are responsible for ensuring Title VI compliance from each of its schools.

- B. The Arts Commission’s Title VI Coordinator will check the list obtained from TDOE against the schools funded by the Arts Commission. If there is a school district (and grantee with the Arts Commission) that is not in compliance with Title VI, the Arts Commission’s Title VI Coordinator will contact the school and require compliance with the Arts Commission’s online Title VI training program. As with other TN Arts Commission grants, should any school grantee be determined noncompliant, funding will be withheld until compliance is demonstrated.

The Tennessee Human Rights Commission approved this process in the final findings report dated December 2, 2016 (*see Appendix I*). The most current list of school districts that are in compliance with Title VI from the Tennessee Department of Education is included in Appendix I.

16. Evaluation Procedures

The Commission operates under policy governance as articulated at http://www.tn.gov/arts/governing_policies.pdf. The Executive Director reports to the Commission quarterly on progress toward Strategic Goals (see page 5). In addition, the Major Cultural Institutions, Community Educational Partnerships, and Individual Artist Fellowship programs engage outside evaluators to provide independent reviews of the work.

Most annual subrecipients/grantees are required to submit final evaluation forms which include data on numbers of participants, age, race/ethnicity, and other demographic factors of populations that have benefitted from the funded project or program. Also, each grantee provides a written narrative of how the funded project increases access to underserved/underrepresented populations which includes minority groups/people of color (*see Appendix A for a copy of the grant evaluations form*). Program Directors are expected to review final evaluation information in accordance with information given at the beginning of the grant application process to compare services offered, results achieved, populations served, and other information about the impact of funded programs. If discrepancies exist, Program Directors are responsible for communicating/working with the agency to improve performance.

As for Title VI, after the data is collected, the Title VI Coordinator gathers data reports to determine percentage of subrecipients in compliance with Title VI training and sends emails of notification when organizations are not in compliance. After emails, phone calls are made by the Title VI Coordinator. In FY17, this method increased the number of grantees that were in compliance with Title VI training and certification to 100%.

Other duties by the Title VI Coordinator to ensure that quality of services are being delivered by grantees include distributing Title VI posters, updating Title VI information on the Commission's website, and ensuring arts organizations of color have full and equal access to grant participation and application.

The Title VI Coordinator is responsible for ensuring that all compliance recommendations and/or deficiencies are fully implemented.

APPENDIX A

- **Title VI Poster (text in both Spanish and English)**
- **Annual Grant Application**
- **Annual Grant Evaluation Form**

APPENDIX B

- **FY17 Sub recipient Data List**
- **FY17 Vendors Data List**
- **FY17 Advisory Panels Racial Data**
- **FY17 Racial and Ethnic Composition of Beneficiaries Data**

APPENDIX C

- **Copy of Spanish translated emails**
- **Copy of Apprenticeship Application in Spanish**

APPENDIX D

- **Tennessee Art Commission's Title VI Complaint Forms (also located on the website)**
 - **Complaint form**
 - **Withdrawal of Complaint form**
 - **Complaint Log**
 - **Appeals Form**

APPENDIX E

- **FY17 Tennessee Arts Commission's Title VI Training for Staff**
 - **Agenda**
 - **Sign In Sheet**
 - **Power Point presentation (revised)**

APPENDIX F

- **FY17 Subrecipient/Grantee Title VI Training List (from eGrant and FLUXX)**

APPENDIX G

- **Copy of Grantee Assurances in Applications**
- **Copy of contract for contractors**
- **Copy of FY17 subrecipient/grantee contract**
- **Copy of NEA Partnership Agreement**

APPENDIX H

- **FY17 Title VI Grantee instructions with contract communicating Title VI compliance**
- **FY17 Title VI Grantee instructions for training**
- **FY17 Grant Workshops listing**

APPENDIX I

- **THRC Title VI Final Audit Report 2016 of the TN Arts Commission**
- **Copy of TDOE school districts in compliance with Title VI - 2016**

APPENDIX J

- **FY17 & FY18 Federal Financial Assistance spreadsheet**