



TENNESSEE
ARTS
COMMISSION

Cultivate. Create. Participate.

FY 2025
Title VI Compliance Report and Implementation
Plan
(FY25 covers July 1, 2024 - June 30, 2025)

Anne B. Pope, Executive Director Kim Johnson, Director of Arts & Health 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.”* In 2019, the Tennessee Arts Commission also adopted a vision statement which is *“a Tennessee where the arts inspire, connect and enhance everyday lives.”* 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 helps fund the arts activities of more than 800 organizations and artists in Tennessee. A chart of all programs that receive Federal Financial Assistance (FFA) and those that do not are listed in Section 8 of this document and Appendix B & L. Each year the Commission conducts competitive grant making activities open to nonprofits, chartered-in-Tennessee organizations, and entities presenting arts programs and activities. Grants are awarded in the areas of Arts for All (*formerly Arts Access**), Arts Project Support, Rural Project Support, Major Cultural Institutions, Partnership Support, Small Urban and Rural Partnership Support, Arts Build Communities, Individual Artist Fellowships, Creative Placemaking, and a variety of Arts Education Grants including Student Ticket Subsidy, Community Learning, Arts Pathways for Youth Success, and Teacher Training.

**In early February 2025, the Commission updated its grant guidelines to clarify compliance requirements related to federal policy changes. All grantees offered awards were responsible for compliance with all applicable state and federal laws and policies, including federal Executive Order 14173 and TN Public Chapter 458.*

Strategic Plan

On May 23, 2019, the Tennessee Arts Commission approved a new strategic plan for years 2020 – 2025. This strategic plan builds on input from stakeholders, the public, and staff. It includes a new vision statement, mission, values, tools and five major goals for a long-range future. The plan was initially developed through a series of public meetings, surveys, and public comment. The official period for the plan is November 1, 2019 through September 30, 2025 with the following goals that were developed:

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 one of the strategies developed to implement Goal 1 is as follows:

Expand accessibility, participation, and inclusion in the arts for all Tennesseans.

- *Define opportunities and target support for underserved communities.*
- *Identify, share and promote best practices for inclusion of underserved communities in the arts.*
- *Increase arts participation and accessibility opportunities for all.*

In 2023 -2025, the TN Arts Commission is in preparation through research, community outreach, and data analysis to create its new strategic plan which will cover the years 2025 – 2030. Public input and feedback is currently being sought throughout the state by online surveys, review panels, nonprofit organizations both funded and not funded by TAC, public and regional meetings, specific data gathered from underserved groups, stakeholder conversations with key state elected officials, commission members and staff. The goal is reach as many people, organizations, and groups as possible across the state to give input into the strategic plan and to have the plan out for public comment by July – August 2025. Based on final public comment, the proposed plan is scheduled to be presented to the TAC board by September 2025 for final approval.

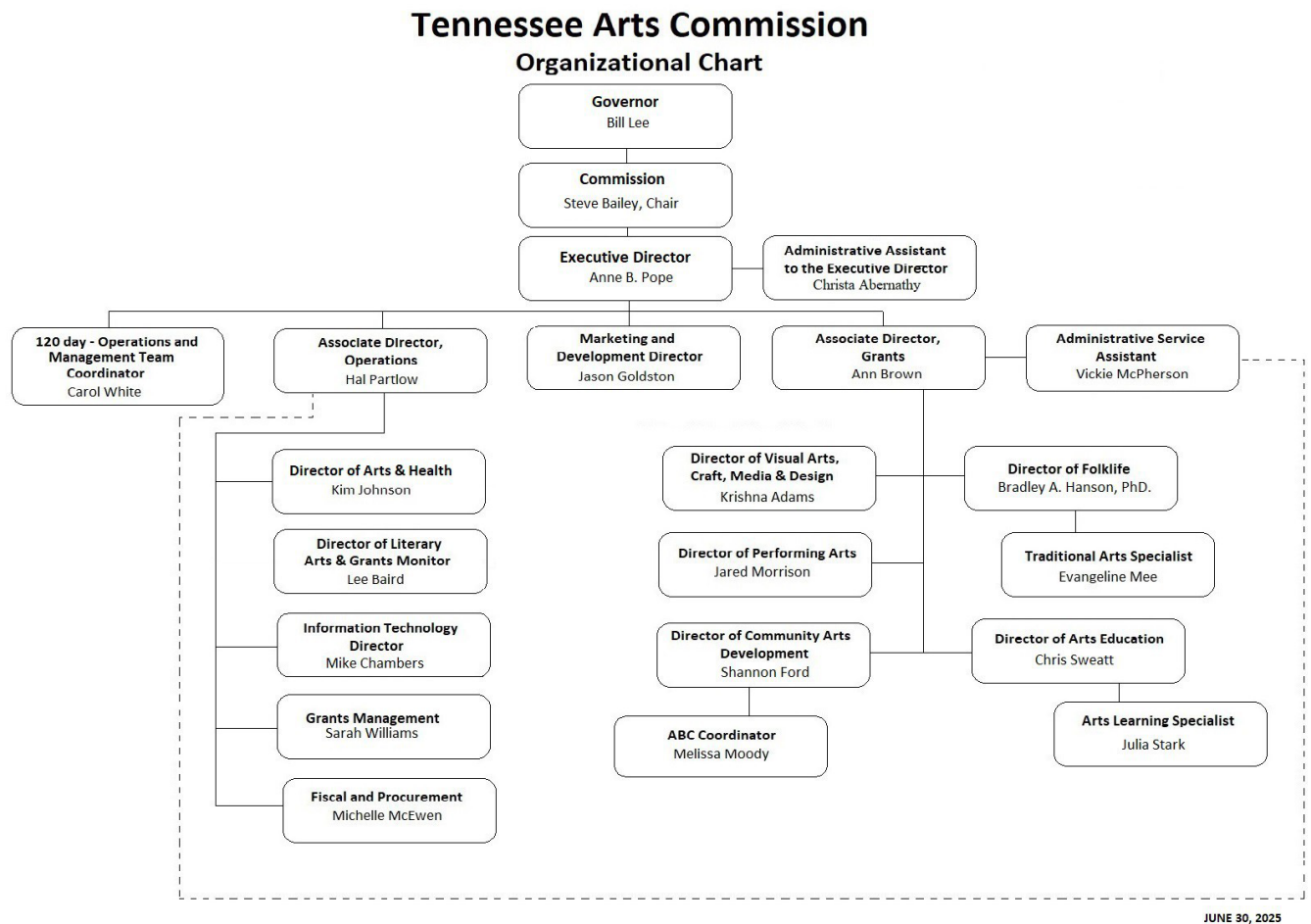
Commission Members

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 37.

Commission Staffing

As of June 30, 2025, the Commission was staffed by 19 employees and one 120-day consultant led by Executive Director, Anne B. Pope (*see Figure 1*).

Figure 1

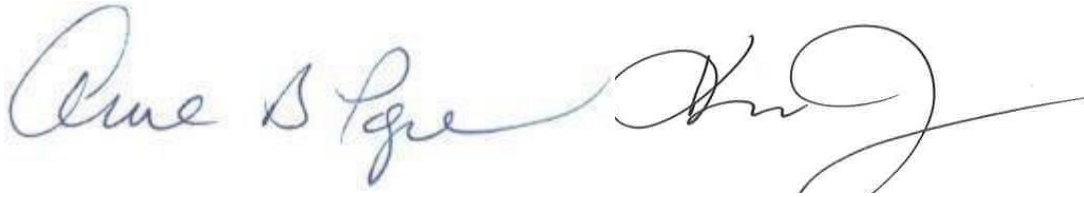


3. Responsible Officials

Anne B. Pope is the Commission's Executive Director and is responsible for its operation and compliance. Kim Johnson is the Director of Arts & Health and the Title VI Coordinator who reports to the 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 Dr. Martin Luther King Jr., Blvd., Nashville, TN 37243 (615-741- 1701).

Signatures:

The image shows two handwritten signatures in blue ink. The signature on the left is 'Anne B. Pope' and the signature on the right is 'Kim Johnson'. Both signatures are written in a cursive, flowing style.

Anne B. Pope
Executive Director
Tennessee Arts Commission

Kim Johnson
Director of Arts & Health/Title VI Coordinator
Tennessee Arts Commission

4. Definitions

Adjudicators or Adjudicated Panels – Out of state evaluators who provide expert guidance on grant applications so that informed decisions can be made in the awarding of grants and technical assistance recommendations can be made to applicants.

Advisory Panel or Review 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.

Arts 360 – Support for whole-school arts integration programs in PK-12 schools to improve instruction and increase student outcomes through arts integration.

Arts Access* - The Arts Access program provided grants in the arts to people with limited access to the arts. **In early February 2025, the Commission updated this grants category and others to clarify compliance requirements related to federal policy changes.*

Beneficiary – Individual and/or entities that directly or indirectly receive an advantage through the operation of a federal program.

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.

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.

Folklife – A program within the Tennessee Arts Commission that is comprised of arts and expressive practices, skills, bodies of knowledge, and ways of living that are learned and passed down in cultural communities that share family, ethnic, tribal, regional, occupational, or religious identity.

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

Individual Artist Fellowships (IAF)- Fellowships provided to artist who by education, experience, or natural talent engage in a particular art form or discipline, and live and work in Tennessee.

Inter-Arts - Operating and project support grants to presenters, nonprofit arts centers, and non-arts organizations presenting multi-disciplinary programming.

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.

Major Cultural Institutions (MCI's) - Organizations chartered in Tennessee that represent the highest level of quality programming and administration with a history of significant year-round arts programming.

National Endowment for the Arts (NEA) - A federal agency directly funding the Tennessee Arts Commission and indirectly its beneficiaries.

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

Recovery Fund or Tennessee Nonprofit Arts & Culture Recovery Fund -Federal support that addresses economic hard to Tennessee nonprofits that have a track record of federal grants administration. This grant category that offers a one-time opportunity for Tennessee arts

nonprofits to address documented negative economic impacts of the COVID-19 public health emergency for operations occurring from July 1, 2021 – June 30, 2024.

Rural Arts Facilities Fund (RAFF) - Grants designed to help rural communities carry out initiatives that build, renovate, or expand arts and cultural facilities.

Subrecipients – Entity that distributes assistance to an ultimate beneficiary.

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

State - State of Tennessee

TAC – Tennessee Arts Commission

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 current policy on non-discrimination is located on the agency's website, <https://tnartscommission.org/art-grants/manage-your-grant/title-vi/> and has been disseminated/available for staff and the general public to view including subrecipients, contractors, and vendors. For fiscal year 2025, the following Non-Discrimination Policy was used (see Appendix A):

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.

In FY26, the following was added to the policy on the TAC website (see Appendix A):

All Commission sponsored programs, services and facilities are fully accessible to all Tennessee artists and citizens. No person of on the grounds of disability, age, race, color, religion, sex, national origin or any other classification protected by Federal, Tennessee State constitutional, or statutory law shall be given preferential treatment or excluded from participation in services, programs and employment provided by the Commission and its contracting agencies. If an individual believes they have been subjected to discrimination, they may file a complaint with the Civil Rights Enforcement Division of the Tennessee Attorney General's Office at [Online Complaint Portal](#); phone: 615.741.5825, email CRED@ag.tn.gov; or by mail to P. O. Box 20207, Nashville, TN 37202.

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: <https://publications.tnsosfiles.com/rules/0140/0140-01.pdf>

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 workplace. 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 Department of Human Resources (DOHR).

6. Organization of the Civil Rights Office

The Tennessee Arts Commission does not have a Civil Rights Office, but the Director of Arts & Health serves as the agency's Title VI Coordinator and is identified as such on the Title VI page of the Commission's website <https://tnartscommission.org/art-grants/manageyourgrant/title-vi/> and on the Title VI posters. Constituents are advised to contact the Commission's Director of Arts & Health /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 Director of Grants Management and Grants Analyst/Director of Literary Arts, 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 Director of Grants Management 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 in Title VI online training modules and information on its website, <https://tnartscommission.org/art-grants/manage-yourgrant/titlevi/title-vi-training/> and posters, <https://tnartscommission.org/wpcontent/uploads/2019/07/TitleIV-poster.pdf>. This material is available to all subrecipients through 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:

Appendix B - Schedule of Federal Funding Assistance to the Tennessee Arts Commission (FY25)

#	Grantor Name	Program Name	Grant Period	Other Identifying #	Notes	Funding Amount
1	National Endowment for the Arts (NEA)	NEA Partnership Grant – Federal Assistance Listing (formerly CFDA) 45.025	7/1/2024-6/30/2025 (FY25)	193218461-24	1-1 Match Required	\$992,250
		General Partnership, which includes \$25,000 for Poetry Out Loud				\$760,350
		Arts Education				\$59,100
		Underserved Communities				\$137,800
		Folk arts Partnership				\$35,000
					Total:	\$992,250

In FY25, no other federal grants, loans, or subsidies not categorized as a program or activity above has been received by the TN Arts Commission.

The Tennessee Arts Commission receives no equipment, training resources, land, loans or detail of federal personnel.

9. Data Collection and Analysis

Agency Data Collection

For many years, the Arts Commission used the National Standard for Arts Information Exchange as required by the NEA to collect racial and other data on its subrecipients through the application and final evaluations process. As of FY23, the NEA no longer required this information and in FY24, the Arts Commission continued collecting this information in its applications and evaluations reporting for FY25. Due to new federal and state laws/policies introduced in FY25 which could affect demographic collection information, TAC will follow all compliance with these laws and seek future guidance from the Department of Human Resources. Appendix C (*Racial and Ethnic Composition of Beneficiaries Data*) gives a breakdown of populations being served currently through grantees in their programs and grantees can compare this information to US Census information in TN at this link -

<https://tnartscommission.org/tn-county-demographics/>.

Racial & Ethnic Data on Beneficiaries

In FY25 the TN Arts Commission changed the information requested in the subrecipient's final evaluations form (see Appendix I, *grant evaluations form*) to gather data that more accurately reported the diverse numbers of people and audiences attending or participating in a subrecipient/grantee program. The following racial ethnicities (see below) were reported served in FY25 for each program's audience numbers. The actual numbers served for each are reflected in Appendix C (*Racial and Ethnic Composition of Beneficiaries Data*). Appendix C shows that in FY25 out of 1136 subrecipients grants, a reported total of 45% of total people served were people of color throughout their various programs (see Appendix C, *racial and ethnic beneficiaries data*). Most organizations reported serving multiple races and ethnicities. This information is often compared to the U.S. Census Demographic information as found on TAC's website - <https://tnartscommission.org/tn-county-demographics/>.

- A Asian**
- B Black or African American**
- H Hispanic or Latino**
- M Middle Eastern or North African**
- N American Indian or Alaska Native**
- P Native Hawaiian or Pacific Islander**
- W White**
- O Other not listed above**

The type of grant subrecipients includes:

- 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

Racial Data on Commission Staff

As of June 30, 2025, the Commission had 19 active staff positions, and one 120-day consultant also listed on the organization chart and received Title VI training in FY25. Of the current 19 active staff, sixteen percent (16%), or three (3) people, identify as African American (*see Figure 3*).

Figure 3- Tennessee Art Commission Staff Chart (as of 6/30/25)

EEO Detail TENNESSEE ARTS COMMISSION			
ID#	Position	Ethnicity	Executive/Preferred
5048	TAC-DIRECTOR	W	Executive
5050	TAC PROGRAM DIRECTOR	B	Executive
5051	ADMIN SERVICES ASSISTANT 3	B	Preferred
5052	TAC PROGRAM DIRECTOR	W	Executive
5058	TAC ASSISTANT DIR	W	Executive
74883	ADMIN ASSISTANT 3	B	Executive
101680	IT MANAGER	W	Executive
1000053	TAC PROGRAM DIRECTOR	W	Executive
1006462	ADMIN SERVICES ASSISTANT 5	W	Preferred
5049	TAC PROGRAM DIRECTOR	W	Preferred
5057	TAC ASSISTANT DIR	W	Executive
5066	TAC PROGRAM DIRECTOR	W	Executive
5072	TAC PROGRAM DIRECTOR	W	Executive
5073	ADMIN SERVICES ASSISTANT 4	W	Preferred

5074	TAC PROGRAM DIRECTOR	W	Executive
5075	EXECUTIVE ADMIN ASSISTANT 3	W	Executive
69105	GRANTS ANALYST 2*	Vacant	Preferred
73543	TAC PROGRAM DIRECTOR	W	Executive
100566	TAC PROGRAM DIRECTOR	W	Executive
119069	TAC PROGRAM DIRECTOR	W	Executive

Totals: 19 active staff + 1 vacancy

From the above table, the following held true as of 6/30/2025:

- Of **19 active staff** (excluding 1 vacancy), 16% or 3 staff identify as Black/African American.
- Of 15 active **Executive Staff** positions, 2 people or 13% identify as Black/African American and 13 people or 87% as White.
- Of 4 active **Preferred Staff**, 1 person or 25% identify as Black/African American and 3 people or 75% as White.

10. Limited English Proficiency (LEP)

LEP Policy and Language Assistance Plan

In FY25, the Commission took reasonable steps to ensure that persons with Limited English Proficiency (LEP) had meaningful access and an equal opportunity to participate in its services, activities, programs and other benefits. The FY25 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 were provided without cost to the person being served. When translation of vital documents was needed, each area in the Tennessee Arts Commission submitted documents for translation into the Commission's Title VI Coordinator.

The Tennessee Arts Commission's policy of non-discrimination in FY25 also covered its intent to provide interpretative and translation services to subrecipients and individuals. Language assistance was provided through use of contracts or formal arrangements with organizations providing interpretation or translation services like AVAZA, or technology and telephonic interpretation services. All staff were aware of this policy and procedure, and staff is knowledgeable 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 are trained to use AVAZA language services in the event of translation needs arising from speakers of other languages. 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

The Tennessee Arts Commission relies on AVAZA to provide translation and interpreter services. Currently no TAC staff member is bilingual, but all staff have been trained to contact AVAZA when interpreting services are needed. When translation of documents is needed, staff submits documents to the agency's Title VI Coordinator for forwarding to a translation service which at this time is AVAZA.

In FY2025, the Commission used 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

615-534-3400 (language accessibility line); access code 37409

The Tennessee Arts Commission has an AVAZA line for its subrecipients/grantees to use when they need translation or interpreting services. This was started since many subrecipients/grantees are very small organizations which did not have the resources to provide for these services. Their language line # is 615-532-3405 and access code is 400231. The Commission approved use of dollars through the Arts Access program to fund this service for grantees.

Documents available in other languages

The Tennessee Arts Commission has not experienced requests for documents in other languages in FY25. Currently the Commission's Title VI posters are written in both Spanish and English (*see Appendix A*). If any future needs arise, the Commission's Title VI Coordinator will coordinate and respond to those language needs.

List of Limited English Proficiency (LEP) Encounters

Staff members are requested to fill in the logbook (see in Figure below and in Appendix D in Excel spreadsheet) located in the Director of Arts & Health/Title VI Coordinator's office when there are LEP encounters and reminders are given at various staff meetings throughout the year. In FY25, staff reported through email (not logged in) the following encounters listed in *Appendix D*.

Appendix D FY25 LEP Logbook			
Language Encounters	# of inperson/field site work encounters per year	# of written (email encounters per year)	# of phone encounters per year
Spanish	2	40	16
Choctaw	0	5	2
Kurdish	0	20	5

Chinese	0	5	1
Japanese	0	10	2
Hindi	0	0	0
Totals:	2	80	26
Total Encounters: 108			

Language Totals:

For FY25 as reflected in Appendix D, the Tennessee Arts Commission reported two (2) in-person encounters; eighty (80) written emails; and twenty-six (26) phone encounters from LEP individuals for a total of 108 encounters. Appendix F reflects the different types of languages encountered.

Examples of LEP encounters:

Folklife is an area within the Tennessee Arts Commission that is more likely to interact with individuals speaking English as a second language. In FY25, staff reported (not logged in) the following encounters listed in *Appendix D*. During FY25, Folklife staff received and responded to calls, emails, and encountered in-person visits where constituents spoke other languages as their first language and English as a second language. Individuals chose, in all of their interactions, to conduct communication in English. One encounter occurred in September 2024 when the Director of Arts & Health used AVAZA services to speak with a Spanish speaking only person to explain services of the TN Arts Commission.

11. Complaint Procedures

Any individual, group of individuals, or organization that believes they have been subject to Title VI discrimination could file a formal, written complaint with the TN Arts Commission (TAC) in FY25. At the beginning of FY26 due to changes in how complaints are to be handled within the State of Tennessee, TAC's website now refers complaints to the Civil Rights Office of the Tennessee Attorney General's Office. As more information is learned and communicated about new changes, this process could change. However, in FY25 TAC's Title VI Coordinator still handled complaints that came into this agency and in the event of a formal complaint, the following procedure was used.

The staff of the Commission has been instructed to route any Title VI inquiries, including complaints to TAC's Title VI Coordinator and the Coordinator will report the complaint information to TAC's Executive Director and senior staff within 24 hours.

In FY25, complaints against the agency or its contracted agencies were to be filed on the state level with the Arts Commission or the TN Human Rights Commission. Complaints could also be filed with TAC's federal funder, the National Endowment for the Arts (NEA). All formal complaints were to be made in writing using the Title VI complaint form located on TAC's website (*see Appendix E for a copy of the complaint forms*). Within ten (10) days of receiving the complaint, TAC notified THRC using THRC's Complaint Notification Form.

The Title VI Coordinator is responsible for acknowledging, investigating complaints and for reporting findings and proposed actions. When TAC receives a complaint, the Title VI Coordinator will initiate an investigation within 30 days of the receipt of the complaint which can include the Title VI Coordinator talking to and/or meeting with all parties to investigate and/or resolve complaints. The TAC Title VI Coordinator may act as mediator to resolve complaints if a subrecipient or complainant so desires.

Before a formal summary and/or proposed action is released to the complainant, the Title VI Coordinator will report the findings to the TAC Executive Director, senior staff and THRC using the Investigative Summary Report. The Title VI Coordinator will then notify the complainant of any findings and proposed actions. Information about complaints will be included in TAC's Implementation Plan that is submitted annually to the TN Human Rights Commission.

A complainant has the right to appeal any decision regarding his/her alleged discrimination complaint against TAC or a contracted grantee. A request for an appeal must be made in writing to TAC's Title VI Coordinator no later than 30 days after the receipt of reported findings and proposed action. If a complainant remains unsatisfied with reported findings or proposed action, they may file a complaint on the federal level.

Total number of complaints

As indicated in Figure 1 below, in FY25, the Commission received one (1) new, anonymous Title VI complaint against a funded grantee.

Figure 1 – FY25 Total number of complaints

Tennessee Arts Commission FY 2025				
Total # of Title VI complaints for FY2025 (new)				1 *
Total # of Title VI complaints dismissed or withdrawn				1 *
Total # of complaints for FY2025 Unresolved				0
Total # of complaints referred to another state or federal agency				0
Total # of Title VI lawsuits for FY2025				0

*On March 14, 2025, a complaint was received on TAC's complaint forms through email on one of our funded grantees. According to procedure, the complaint was reported to senior TAC staff within 48 hours and to the TN Human Rights Commission within 10 days. An investigation was started by TAC's Title VI Coordinator, but the complaint was anonymous, had no valid mailing address, and no valid phone number. The complaint as written did not show reasonable cause that a Title VI violation had occurred based on race, color, or national origin. It appeared to be a complaint against the grantee's board and its conduct. After consulting with the TN Human Rights Commission, a final resolution letter was sent on April 7, 2025 to the board chair and Executive Director of the grantee organization dismissing the complaint.

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 in *Appendix E*.

In FY25, no federal complaints were received, and no lawsuits or litigation was filed against the TN Arts Commission on the basis of race, color, or national origin.

12. Title VI Training Plan

Description of Title VI Staff Training

As of June 30, 2025, the Commission had 19 active staff members and 100% of staff received in-house, virtual Title VI training in FY25 (training roster on file at the offices of the TN Arts Commission) on June 5, 2025 by the Title VI Coordinator. Since a new requirement from the Department of Human Resources in FY25 required all state employees to complete Edison training on the basics of Title VI. 100% of TAC's staff completed this training (see *Appendix F Edison Title VI Staff Training*) and our in-house training focused on current changes, deadlines, and other information related to Title VI needed by our staff (*Appendix F contains the training materials used*). For new staff that comes in throughout the year, the Title VI Coordinator provides training as part of their orientation process.

At the time of FY25 staff training, many changes were occurring at the federal and state levels. The training therefore focused on the basics of Title VI and LEP, changes that were currently known with Title VI, LEP, and ADA requirements, and deadlines for grantee subrecipients in the coming year. TAC's strategy in managing these changes was to keep functioning under the current rules and responsibilities until further direction from DOHR Title VI compliance Program (*Appendix F contains the training materials used*).

Description of Title VI Subrecipient Training

The Tennessee Arts Commission uses an online grants managements system called FLUXX and all subrecipients/grantees are required to conduct Title VI training through this system. Information on how to submit Title VI is widely communicated through instructions over our website, Newsletters, and in the FLUXX system itself. In FY25, 99.9% of 809 subrecipients/grantees (see *Appendix G for a list of training dates/compliance for subrecipient organizations*) completed on-line Title VI training through this system or in the case of schools, were approved to be in compliance through the Tennessee Department of Education (see *Appendix N, copy of TDOE schools in compliance for FY24*). Due to a mistake in internal controls in FY25, one (1) organization did not complete Title VI training which reduced our compliance to 99.9%. We will continue to work towards improving our processes and grantee submissions to achieve maximum compliance results.

For subrecipients/grantees, Title VI requirements are communicated through instructions located in the FLUXX online system, website, and in the Newsletter (see *Appendix G, FY25 training instructions*). For FY25, Title VI training dates for subrecipients are seen in the chart below and deadline dates depend on the type of grant.

Chart of Training Dates

Group	Training Dates	Percentage & Actual #
TAC Staff	<ul style="list-style-type: none"> Edison Title VI Staff Training (required by DHOR- see Appendix F) 	100% of 19 staff
TAC Staff	<ul style="list-style-type: none"> June 5, 2025 (in-house, virtual) 	100% of 19 staff
TAC Subrecipients	<ul style="list-style-type: none"> Annual grants – July 1- Dec 13, 2024 and/or by the first request for funds whichever is first Rolling grants – before payment is disbursed ABC grants – by October 1, 2024 For all other grants awarded Jan – June 2025 due by June 15, 2025 	99.9% of 809 subrecipients including schools (<i>see Appendix C, training dates/compliance for subrecipient organizations</i>)

Staff, subrecipients and/or contractors are expected to comply within the dates above and no future training dates are offered. For subrecipients, if training dates are not met, then payments are withheld during that funded year and future funding with the Arts Commission may be jeopardized.

The Associate Director of Operations, Director of Grants Management, Title VI Coordinator and all Program Directors work to ensure that all grantees are in compliance. One way that compliance is maintained is through a mid-compliance report that is run in December and May of each fiscal year to contact grantees are not in compliance with Title VI especially those who received grants later in the fiscal year from January – June. Program Directors contact subrecipients who are not in compliance and this action tends to increase our compliance rates for all subrecipients.

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 four

(4) different modules (*see Appendix G for a copy of the FY25 subrecipient training instructions*). It is designed to capture additional information from grantees which includes verification of having Title VI and LEP policies in place, and information about the AVAZA line only for subrecipients/grantees, especially smaller organizations with limited resources, that can be used to meet their language needs (*see Appendix G for a copy of the training modules & form*). A summary of the FY25 training modules is as follows:

Module I - (approximately 26 minutes) <https://www.youtube.com/watch?v=90uNM-aZwdI>
Created by the US Department of Justice several years ago, this video provides an extended overview of Title VI. The closed captioning option is not recommended since auto-generation has resulted in discrepancies in the transcription.

Module II - (approximately 6 minutes) https://www.youtube.com/watch?v=MU_SfdA6E5w

Created by the US Department of Justice several years ago, Part 1 of this video provides a brief overview of Title VI and has appropriate closed captioning.

Module III (approximately 8 minutes total)

Part 1 - (approximately 4 minutes) - <https://www.youtube.com/watch?v=I3MMk0ovNto>

Part 2 - (approximately 4 minutes) - <https://www.youtube.com/watch?v=S9E1MYIKFTA>

Created by the Tennessee Arts Commission, these videos contain presentation slides on disparate treatment, disparate impact and specific examples of Title VI in arts programming.

Module IV - (approximately 24 minutes with closed captioning available)

<https://www.youtube.com/watch?v=RPClqDtRUkA>

Created in 2010 by the US Office for Civil Rights, US Department of Health & Human Services, this video explains Title VI, Limited English Proficiency (LEP), and the use of interpreters. This video however was not specifically designed for arts organizations and the examples are not reflective of arts programming, but it does give a good overview of Title VI concepts.

Additional videos for viewing on specific Title VI topics:

These videos are for supplemental learning only and will not meet compliance for Title VI:

Disparate Treatment and Impact - (approximately 1 minute)

<https://www.youtube.com/watch?v=wWJAi4cEFCQ&feature=youtu.be>

Title VI and Limited English Proficiency - (approximately 5 minutes)

<https://www.youtube.com/watch?v=mSGbIpKRQ-c&t=15s>

13. Sub-recipient Monitoring

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

As part of the application process, each applicant (potential subrecipient) for FY25 was required to sign a Statement of Assurances (*see Appendix H 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 H for a copy of this contract*).

A. Pre-Award Procedures

For FY25, applicants (potential subrecipients) in the pre-award phase were required to provide racial data in the areas of county demographics, board, staff, and projected underserved 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. Panel members use this, and other information provided by the organization to evaluate and rate the application (*see copy of grant application in Appendix I*). 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.

The Tennessee Arts Commission does not conduct pre-award field or on-site reviews since an organization must apply annually for funding and there is no guarantee that each organization will receive funding. After receiving applications, organizations are checked to verify 501c3 status, corporate annual report filing, board of directors, by-laws, and other requirements of funding. If an organization is awarded an annual grant and signs a contract, then the organization is held responsible for following Title VI compliance.

Although vendors/contractors 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/contractors for FY25 is listed in *Appendix H*.

B. Post-Award Procedures

In FY25, once grant amounts were approved by the Commission board, grant awards were announced in annual award letters by email sent to each funded subrecipient/grantee organization. This award letter includes a section that states Title VI training must be complete when an organization submits its first request for payment from the TN Arts Commission (*see Appendix J, FY25 Subrecipient awards letter*). It also gives the Title VI deadline date for each type of grant category. Grantees sign and return the contract which includes standard Title VI compliance language. In the online system, grantee organizations can obtain the Title VI training information, instructions and deadlines for each type of grant (*see Appendix G*).

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 FY25, the Director of Grants Management and/or Title VI Coordinator would review any subrecipient who was trying to request a funds payment and was not in compliance with Title VI. The Title VI Coordinator, Director of Grants Management, or Program Director would then contact the subrecipient/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 subrecipients according to timelines established by the agency. For example, in FY25, annual grant recipients had a deadline of December 13th and rolling grants were required to complete Title VI before payments were disbursed. Each grant was monitored according to these timelines and reviewed by the Title VI Coordinator or Director of Grants Management for compliance.

After each Title VI training form is complete, the Title VI Coordinator or Director of Grants Management 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. For subrecipient monitoring, the Tennessee Arts Commission also verifies that LEP and Title VI complaint policy/procedures are in place for each subrecipient/grantee by asking additional questions on the Title VI training and certification form to determine what procedures/policies subrecipients currently have in place and request subrecipients to upload these documents into the online system, FLUXX, that can collect this data. If procedures are not used, the subrecipient organization will be given assistance on how to form and execute a plan. In this way, the Tennessee Arts Commission will be able to verify that LEP and Title VI complaint policy/procedures are in place for each subrecipient organization.

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 118 grant contracts in FY25 which checked on several factors within the actual operations of a sub-recipient/grantee which includes minimum Title VI compliance standards and additional monitoring for Recovery Fund grants was done by Horne, LLC and is ongoing (*see Appendix K for a copy of the grants monitored in FY25 and TAC's Subrecipient Contract Monitoring Population*). Since on-site reviews are not feasible, this monitoring by the Grants Analyst is done within the online grants management system.

C. Subrecipient Title VI Training

For FY25, subrecipients/grantees of the Tennessee Arts Commission were required to conduct on-line Title VI training through the FLUXX system. Contracts were mailed June 2024 with detailed instructions on submitting FY25 Title VI training requirements. Subrecipients/annual grantees had until their first request for payment or no later than December 13, 2024, whichever came first to submit their FY25 Title VI form (*see Appendix G, training instructions for subrecipients/grantees and subrecipient training modules*). Grant funds were withheld until the subrecipient/grantee's Title VI training requirements were met. At the end of FY25, 99.9% of 809 subrecipient/organizations were in compliance with Title VI training (*see Appendix G*).

D. Procedures for Noncompliance

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 the Grants Analyst doing some verification of Title VI compliance.

Each year, dates are communicated of when Title VI training is due for each type of grant (*see Appendix G*). 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 and Program Directors initiate communication through emails and phone calls to voluntarily increase training compliance with Title VI. In May of each year, a final review is done before the year’s annual close-out to determine Title VI compliance of subrecipients.

Throughout the year, 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. Multiple attempts are made to encourage voluntary compliance. If an organization fails to meet any contract requirements, including compliance with Title VI, it is reported at the grant advisory panel review meetings and may result in negatively affecting the organization’s grant score. Non-compliance information is also reported to the Arts Commission’s Audit Committee and at Commission meetings. Based on noncompliance, future funding for these organizations is jeopardized.

E. Subrecipient/Contractor/Vendor Information

Description of Subrecipients

Subrecipients/grantees are funded within grant categories by the Commission which reflect an arts discipline or population that is served, and this reflects the subrecipient’s description. For a total list of each subrecipient information including contracts dates, dollar amounts of contract (i.e., financial assistance to subrecipients), location, funding source, description of services, contract type, and competitive/noncompetitive, (see *Appendix L, List of Identifying Subrecipients*). This Appendix also shows that out of 1156 organizations awarded grant contracts, 14.9% were to organizations primarily serving people of color (see *Appendix L, List of Identifying Subrecipients*). One subrecipient/grantee may have more than one type of grant.

The grant categories are as follows and all subrecipients/grantees are aligned within these grant categories (see *Appendix I for a complete listing of each subrecipient and their description*):

AA	Arts Access Annual Grant
AA - MG	Arts Access Mini Grant
ABC	Arts Build Communities Grants through Designated Agencies
AE – AI	Arts Education – Arts360 Arts Integration
AE - CL	Arts Education – Community Learning
AE - PATHWAYS	Arts Education – Arts Pathways for Youth Success
AE – MG	Arts Education – Mini Grant
AE – TI	Arts Education – Teacher Incentive

AE – TT	Arts Education – Teacher Training
APS	Arts Project Support
CI	Commission Initiatives
CP	Creative Placemaking
IAF	Individual Artist Fellowship
Inter-Arts	Inter-Arts
LINEIT	Direct state budget appropriations
RAPS	Rural Arts Project Support
RAFF	Rural Arts Facilities Fund
PDS	Professional Development Support
PS	Partnership Support
MCI	Major Cultural Institutions
SPECOP	Special Opportunities
STS	Student Ticket Subsidy
SUPS	Small Urban Partnership Support
SRPS	Small Rural Partnership Support
TADI	Targeted Arts Development Initiative
TAAP	Traditional Arts Apprenticeship Program

F. Statement of Assurances

Each subrecipient/grantee electronically signs a statement of assurances in both the application (*Appendix H, statement of assurances*) and the awarded contract (*Appendix H, subrecipient/grantee contract*). In the subrecipient/grantee contract, section A6 pertains to Title VI:

- A.6. Required Training. The grantee shall comply with all requirements of Title VI of the Civil Rights Act 1964, including annual training of grantee or grantee organization employees utilizing materials provided by the State. TN public school grantees may meet the requirement through Title VI training system of the TN Department of Education. Written documentation of training shall be maintained for a period of three (3) full years from the date of the final payment under the grant and shall be subject to audit at any reasonable time and upon reasonable notice by the state agency, the Comptroller of the Treasury, or duly appointed representatives.

Also, in the subrecipient/grantee contract (section D.10) and for contractors (section D.9), refers to provisions prohibiting discrimination (*Appendix H, subrecipient/grantee contract & contract for contractors*):

- D.10. Nondiscrimination. 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.

Each subrecipient/grantee signs this annual contract to receive funding and is required to fulfill all obligations within that contract including Title VI compliance and nondiscrimination policies. New subrecipients (grantees) are included in the list of all subrecipients in *Appendix L, List of Identifying Subrecipients* and like other subrecipients, the Arts Commission requires that they comply with Title VI like all other subrecipients (grantees). A list of all subrecipient grantees who signed a contract with the statement of assurances included are located in Appendix L.

G. Minority Contractor Participation

For FY25, the TN Arts Commission worked with two (2) contractors/vendors. None were minority vendors, and none were new (*see Appendix H for a list of contractors/vendors*).

The TN Arts Commission has no other federal financial assistance applications pending with other federal and/or state departments and/or agencies and is not responsible for any annual federal program monitoring.

H. New Subrecipients

For the TN Arts Commission, we consider new subrecipients as newly funded grantees on an annual basis since their programs change each year and a new contract is signed. A list of all FY25 subrecipients can be found in *Appendix L*.

For FY25, the TN Arts Commission worked with two (2) contractors/vendors. None were minority vendors, and none were new (*see Appendix H for a list of contractors/vendors*).

I. Contractual Provisions

In each contract, the following language is included in contracts that prohibits discrimination (*see Appendix H, FY25 Subrecipient Contract*).

A.6. Title VI Required Training, Non-Discrimination Policy and Complaint Process. The grantee organization shall comply with all requirements of Title VI of the Civil Rights Act 1964, including annual training of grantee or grantee organization employees utilizing materials provided by the State. TN public school grantees may meet the requirement through Title VI training system of the TN Department of Education. Written documentation of training shall be maintained for a period of three (3) full years from the date of the final payment under the grant and shall be subject to audit at any reasonable time and upon reasonable notice by the state agency, the Comptroller of the Treasury, or duly appointed representatives. As noted in the required Title VI training certification for 2020 and going forward, the Grantee organization shall also be required to develop and/or use Title VI complaint procedures and Limited English Proficiency (LEP) policies. The Grantee shall also post Title VI poster(s) in public view at the agency's office(s) or programming site(s) and communicate its nondiscrimination policy on the agency's website or posted in a public place. Title VI posters provided by the TN Arts Commission can be downloaded here at <https://tnarts.wpenginepowered.com/wp->

<content/uploads/2019/07/Title-IV-poster.pdf> and a model for a nondiscrimination policy is available here at <https://tnartscommission.org/art-grants/manage-your-grant/title-vi/>.

J. Pending FFA Applications

There are no pending applications for federal financial assistance.

K. Federal Program Monitoring

The TN Arts Commission has no annual federal program monitoring responsibilities.

14. Public Notice and Outreach

A. Description of Methods used to inform the Public:

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, Newsletters, and grants workshops.

1. **Non-discrimination Policy** - The Commission's website, all contracts, and Title VI posters state the agency's non-discrimination policy. See nondiscrimination policy here - <https://tnartscommission.org/art-grants/manage-your-grant/title-vi/> and in Appendix A. The FY25 policy is listed in Appendix A and TAC's website contains the FY26 policy.
2. **Programs and Services** - The Commission uses several ways to disseminate its information to the public about its grants, programs, and services. In FY25, this included:
 - In-person and virtual grant workshops by Program staff used to inform the public on several grants related topics that are important to communicate. Attendance is free and open to any organization in the state. Notices about these workshops are widely announced through local newspapers, the agency's website, and database emails. In FY25, twelve (12) grants workshops were held throughout all regions of the State. (*see Appendix M for copies of these notices and the locations of each workshop*).
 - The Commission's website contains all information about its grants, programs, and services which hundreds of people visit each year.
 - On a daily basis, Commission staff talks to individuals/public by email and phone about programs, services, and grants.
3. **Complaint Procedures** –The latest Title VI Implementation Plan which has the complaint procedure listed is located on the Commission's website at <https://tnartscommission.org/wp-content/uploads/2024/10/FY24-Title-VIImplementation-Plan.pdf>. The website also provides the contact information for how to file a complaint if a person believes they have been subjected to discrimination. In FY25, the TAC website had complaint forms on its site. However, the current website for FY26 has changed to show how we were instructed to handle current complaints - <https://tnartscommission.org/artgrants/manage-your-grant/title-vi/>.
4. **Minority Participation on Boards**

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 FY25, three (3) of the 15 Commission members or 21% were African American and the remaining members were White. The

current list of Commissioners is posted on our website at <https://tnartscommission.org/about-us/staff/>.

B. Minority Media utilized for Outreach

In terms of the utilization of minority media, the Tennessee Arts Commission (TAC) has contacts with all major media outlets in the state since people, including minorities, tend to receive information through a variety of media outlets. Specifically, TAC has contacts with over 200+ media outlets which includes an estimate that 2% are media outlets of color. Depending on a communication's target, TAC chooses which media outlets would be most effective in reaching an intended audience which can include minority media. Also, even though TAC does not keep demographic information on this list of subscribers, most information is disseminated through our weekly online newsletter, which reaches an estimated 2000+ subscribers, which includes minority media and people of color.

C. Engagement with minority organizations and communities

The Tennessee Arts Commission interacts with minority organizations and communities through a variety of ways including the following:

- Distribution of grant information, program notifications, and opportunities for participation in regional and national events are distributed weekly to 2000+ subscribers of the agency's online newsletter and through e-blasts.
- Contacts with over 200+ media outlets and approximately 2% are organizations of color.
- One-on-one consultations by staff to any constituents or groups upon request.
- Staff members attending arts and community events to distribute Commission information and participating in panels on a variety of topics and groups across the state. Examples include attending Native American Pow Wows, African American-led art workshops in Memphis, and Latino-led festivals.
- Conducting workshops/webinars in-person and virtually to promote grants awareness from all populations.
- Prioritizing underserved/underrepresented people and organizations through program areas like Folklife, Arts Education, Arts Build Communities, Rural Project Support, and Arts Access. All program areas provide programmatic, administrative and technical assistance to support the diverse needs of applying organizations.
- 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. The

solicitation is also provided to the Department of General Services Central Procurement Office for posting on the internet.

D. Advisory Boards and Committees

The Tennessee Arts Commission Members

The Tennessee Arts Commission is governed by a Board that maintains and impacts the goals of the Commission 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 800 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 people, 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.

The Governor appoints and fills vacancies for 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 MEMBERS	
Nancy Dishner – District 1	Stephanie B. Conner – District 5
Cindy Ogle – District 1	Kurt Winstead – District 5
Steve Bailey – District 2	Marc Burnett* – District 6
Jenny Boyd – District 2	Donald Fann – District 6
Janice McNally – District 3	Jason Rudd – District 8
Sarah Cantrell – District 3	Rachel Knox* – District 9

Anne Davis – District 4	Howard Robinson* – District 9
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** Three (3) members or 21% were African American and eleven (11) were White, as of 6/30/2025.*

Advisory Panels

Advisory Panels are comprised of people throughout Tennessee (adjudicators usually are from other states) who review the applications in the different grant categories that are received each year. Panelists review the applications in advance and assign preliminary scores based on evaluation's criteria. Each applicant is then assigned a day/time for the organization to meet with the advisory panelists for them to ask questions about their application. Panelists can ask any questions about the application. Questions are often asked about budgets, financial history, board diversity, evaluation methods, outreach and marketing plans, and needed clarity in parts of the application. Afterwards, panelists assign a final score to the application which is used to determine that year's grants award funding.

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 <https://tnartscommission.org/art-grants/app-review-process/>. Panelists are recruited who represent various geographic, professional and arts discipline expertise. Panelists may serve up to three consecutive two-year terms. Most panels have representation from persons of color unless members must be absent on a review day. Outreach to solicit minority reviewers is done throughout the year at fall workshops advertised publicly throughout the state, Arts Advocacy Day participants each March, each Program Director's relationships with artists and minority organizations, and through the general public.

In FY25, the Commission held twenty-three (23) advisory panels and 3 adjudicated panels which reviewed and evaluated grant applications (*see Appendix C, Advisory Panels List*). Panelists also serve as year-round resources to the staff and as advocates for the arts in their communities. There were 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 Individual Artist Fellowships are reviewed by out-of-state adjudicators. Of the total 135 advisory panelists and adjudicators in FY25, 36.2% were people of color (*see Appendix C, FY25 Advisory Panels List*). Listed below are the percentage of people of color representation for each advisory panel as described in Appendix C:

Arts Access #1	50%
Arts Access #2	50%
Arts Access #3	60%
Arts Access #4	50%
Music	0%
Theater/Dance	20%
Literary	60%
Arts Pathways for Youth Success #1	40%
Arts Pathways for Youth Success #2	17%
Arts Pathways for Youth Success #3	20%
AE Community Learning #1	40%
AE Community Learning #2	17%
AE Community Learning #3	20%
AE-Teacher Training	33%
Visual Arts	50%
Raps #1	33%
Raps #2	17%
Folklife	33%
MCI Adjudicators	33%
Community & Inter Arts	40%
Creative Placemaking	33%
Rural Arts Facilities Fund	33%
Partnership Support	50%
Adjudicators (Visual Arts)	33%
Adjudicators (Literary)	66%
Adjudicators (Music, Dance, Theater)	0%

E. 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 board members or TAC staff 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.

Also, 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 has been especially true in the Arts Access and Folklife areas where organizations of color, which may be new to the grants process, can receive technical assistance in preparation for applying to larger annual grants.

Additionally, the Commission implements a series of Grant Workshops annually in multiple regions of the state to inform the public about its processes for obtaining grants. Through the Commission's website, Newsletter, and direct emails, the public is invited to attend (*see Appendix M for those listings*).

In calendar years 2024-25, as the Arts Commission received input for its strategic plan for years 2025 -2030, individuals and organizations including those representing minority groups were asked to give comments during the public feedback stage of the strategic plan.

To re-cap, the Commission uses a variety of methods to inform the public about the process for obtaining grants which includes:

- TN Arts Commission's website which includes the grant guidelines, process for applying and managing all grants;
- Annual Grant workshops which are held virtually and specifically target those who are interested in applying for a TAC grant;
- Program Director's responding to individuals who contact the Commission daily to inquire about grants and the process for applying;
- Program Directors being requested to attend as a panelist or speaker for workshops, seminars, etc. throughout the state to share information about grants;
- Informal conversations, word of mouth, recommendations from existing grantees, attendance of TAC staff at programs and festivals, etc.

15. Compliance Reporting

A. Federal and State agencies which receive Title VI reports

In FY25, The Tennessee Arts Commission received funds from the National Endowment for the Arts (NEA), but this agency has no reporting requirements related to Title VI. In FY25, no federal agency required Title VI compliance reports from the Commission.

B. List of all federal reporting obligations

As stated above, in FY25 the Commission received 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 H 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.*

C. Title VI related audits

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 N 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 in August, 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) st required from all school districts each year on August 1 . 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 N*). This process was continued in FY25 and the most current list of school districts that are in compliance with Title VI from the Tennessee Department of Education is included in *Appendix N*.

16. Evaluation Procedures

In January 2025 due to changes in federal and state laws/policies, many questions arose as to the overall direction of Title VI including if specific demographic populations could be reported as being served, implementing revised grant guidelines, budgets, and proposals; and learning about new state agencies that would manage the overall Title VI processes. Additionally, within our federal funding provider, the National Endowment for the Arts (NEA), funding levels that would go to state arts agencies were being reviewed but TAC continues to be funded by the NEA.

With all of these changes in FY25, the Arts Commission continued to see a high demand from applicants applying for annual grant awards. In this fiscal year, The TN Arts Commission continues to comply with changes in federal and state policies and laws pertaining to Tennessee's eligibility for any available federal funding. In early February 2025, the Commission updated its grant guidelines to clarify compliance requirements related to federal policy changes. All organizations that applied for FY26 Annual Grants (applied in FY25) were encouraged to comply with adjusted TN Arts FY26 grant guidelines, which included revised panel evaluation criteria. Revised program activities and budgets from applicants were then reviewed to ensure that programs would be broadly open to the public and not exclude any individuals from participating. All grantees who accepted awards were required to sign assurances to be responsible for compliance with all applicable state and federal laws, including Executive Order 14173 and TN Public Chapter 458.

Currently, the TN Arts Commission continues to analyze data from the subrecipient grants category of Major Cultural Institutions (MCI) as a benchmark to determine if diversity in grants funding has been met. This grant category is the Arts Commission's highest level of support and in FY25, thirty-two (32) subrecipients were funded in this category (*see Appendix O*). In FY25, we changed the information gathered in the final evaluation reports from each subrecipient to reflect more accurate demographics of the people served. This gave us a more complete picture of the people being served especially as it pertained to the racial makeup of actual program participants. In FY25, the application contains information on the percentage of people of color the project intends to reach, along with the county demographics of the organization's physical location. After comparing application data with evaluation data (*see Appendix O*) to make sure data about racial demographics aligns from application to evaluation, the Commission can question organizations that consistently do not meet expected percentages in the people of color to be served. This information is often questioned in the panel review of each applicant and can impact the overall score of an application. Even though this demographic information continued to be collected in FY25, as changes occur within Federal and State mandates, TAC will continue to be in compliance with these laws and will work with the Department of Human Resources on any updates throughout this coming fiscal year to determine the changes that are needed within the collection of demographic information and our Title VI processes.