

State of Tennessee  
**Board of Probation and Parole**

404 James Robertson Parkway Suite 1300  
Nashville, Tennessee 37243



Title VI of the  
1964 Civil Rights Act

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

Title VI Implementation Plan  
2011 Annual Report

Submitted By

Charles Traughber, Chairperson

Ronnie Cole, Member  
Joe Hill, Member  
Chuck Taylor, Member

Patsy Bruce, Member  
Yusuf Hakeem, Member  
Lisa Jones, Member

Patricia Merritt, Executive Director

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STATE OF TENNESSEE  
BOARD OF PROBATION AND PAROLE  
**404 JAMES ROBERTSON PARKWAY, SUITE 1300**  
**NASHVILLE, TENNESSEE 37243-0850 (615) 741-1673**

September 15, 2011

Marcus J. Thomas, Title VI Compliance Program Director  
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Pursuant to T.C.A. 4-21-903 and established guidelines, enclosed is the Board of Probation and Parole 2011 Title VI Implementation Plan.

Please call if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles M. Traugher".

Charles M. Traugher  
Chairman,

cc: Patricia Merritt, Executive Director

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# **SECTION 1 - INTRODUCTION to the Board of Probation and Parole Overview**

## **PURPOSE:**

The purpose of Title VI of the Civil rights Act of 1964 is to prohibit programs that receive federal funds from discriminating against participants on the basis of race, color, or national origin.

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

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

The intent of the law is to ensure that all persons, regardless of their race, color, or national origin, are allowed to participate in these federally funded programs. To ensure that the Department meets its compliance responsibility, the following procedures have been established to provide for monitoring of the Title VI compliance, activities and complaint processing in programs directly or indirectly responsible to the Department (i.e. the Department's own programs, contracted services, and Departmental-funded community service organizations, all of which receive any federal/state funding in whole or in part).

## **SCOPE:**

The Tennessee Human Rights Commission (THRC) Title VI Compliance Program was established as a result of State of Tennessee Public Acts, 2009 Public Chapter No. 437, later codified as Tenn. Code Ann. 4-21-203. Effective July 1, 2009, THRC was charged with the responsibility of verifying that all state governmental entities which are recipients of Federal financial assistance comply with the requirements of Title VI of the Civil Rights Act of 1964.

The Title VI policy applies to all programs and facilities operated directly by the Department and to all facilities and programs operated by individuals or groups under contract with the Department.



STATE OF TENNESSEE  
**BOARD OF PROBATION  
 AND PAROLE**



INDEX #104.03.  
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 (09-01-00)  
 PCN #001-01  
 (05-15-07)

**ADMINISTRATIVE POLICIES  
 AND PROCEDURES**

SUBJECT: TITLE VI AND NON-DISCRIMINATION

APPROVED BY:

- I. **AUTHORITY:** Title VI of the Civil Rights Act of 1964, 42 USC 2000d et seq.; TCA 4-21-901, 40-21-904, and 4-21-905.
- II. **RELATED ACA STANDARDS:** None.
- III. **APPLICATION:** This policy governs the actions of the Executive Director, District and Division Directors; Agency staff designated "Title VI Site Coordinators" (Coordinator) and the Agency Title VI Coordinator, all providers and recipients of Agency services including contracted parties, all Agency staff, and all offenders.
- IV. **DEFINITIONS:**  
 Title VI (6) of the Civil Rights Act of 1964 (Title VI): Federal statute that states "no person in the United states shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."
- V. **POLICY:** *The Board requires that its Agency not discriminate on the basis of race, color or national origin in any aspect of its provision of services.*
- VI. **PROCEDURES:**
  - A. BOPP shall provide for prompt and equitable resolution of complaints alleging any action prohibited by Title VI.
    - 1. The Chair will designate an Agency Title VI Coordinator (who may also be designated as a site Coordinator) to organize and oversee Agency-wide compliance with the requirements of Title VI.
    - 2. Coordinators shall review and ensure response to any allegation of violation under Title VI.
      - a. Each District Director shall designate a Coordinator for the respective district.
      - b. The Executive Director shall designate a Coordinator for Central Office.
      - c. The Director of the Community Corrections grant programs shall act as Coordinator for that program.
    - 3. A person alleging discrimination based on race, color, or national origin in the delivery of any service or program covered by Title VI may file a complaint with BOPP. All such complaints must be filed within one hundred eighty days of the occurrence of the alleged discriminatory act.

## **C u r r e n t   B o a r d   M e m b e r s**

### **Chairman Charles Traugher**

Mr. Traugher started his criminal justice career as an Institutional Counselor in the Department of Correction in 1969. In 1972, he was appointed Chairman of the Board of Paroles and served until June 1976. He served as a member of the Board from 1976 until July 1977, when he was re-appointed Chairman. He served in that capacity through June of 1979. He again served as a member until December 1985. From that date until December 1987, he worked as a consultant with a private correctional company. He was reappointed Chairman in January of 1988 and has served as Chairman since that date. He was reappointed to six-year terms on the Board in 2000 and again in 2006. A native of Chattanooga, Mr. Traugher is a graduate of Tennessee State University in Nashville. He is a member of the Tennessee Correctional Association, the American Correctional Association and serves as president of the Association of Paroling Authorities International. He has served on the Tennessee Sentencing Commission and on various other committees addressing prison capacity issues and the criminal justice system.

### **Patsy Bruce**

Patsy Bruce, a native of Nashville, was appointed to the Board of Probation and Parole on March 26, 2004. Before that, she operated a number of entertainment and event management and marketing companies, including Patsy Bruce Productions, Inc., a film and television production company, and Events Unlimited, an award-winning event management company. In addition to her business endeavors, Ms. Bruce is heavily involved in neighborhood advocacy work, where she organized the West Nashville Presidents Council, a Nashville consortium of neighborhood presidents.

### **Ronnie Cole**

Ronnie Cole was appointed to the Board of Probation and Parole on January 22, 2004. He was born in Milan, but has lived in Dyersburg for more than 30 years. He is a retired Vice President of the Ford Construction Company, a Dyersburg paving and bridge building contractor, where he worked for 34 years. He also served in the Tennessee House of Representatives in the 98<sup>th</sup> through 102<sup>nd</sup> General Assemblies. Mr. Cole earned a bachelor's degree in business administration from Memphis State University. He is a Past President of both the Tennessee Road Builders Association and the Contractor's Division of the American Road and Transportation Builders Association. He is also a former member of the Tennessee Board for Licensing Contractors.

### **Yusuf Hakeem**

Yusuf Hakeem was appointed to the Board of Probation and Parole on January 23, 2006. He is a graduate of Howard High School and Chattanooga State Technical Community College and is currently working toward a bachelor's degree from the University of Tennessee-Chattanooga. He served on the City Council of Chattanooga for 15 years as a representative of District 9 and was elected Council Chair in 1996, 2000, and 2001.

### **Joe Hill**

Union City's Joe Hill was appointed to the Board of Probation and Parole in April of 2008. Mr. Hill came to BOPP following his retirement from the staff of Eighth District Congressman John Tanner. He is a native of Henry County, Tennessee. Mr. Hill is a 1964 graduate of Henry High School and earned his bachelor's degree from Bethel College in McKenzie in 1968. He served four years as Project Director of the Northwest Tennessee Development District. He was twice elected to the Henry County Commission. In 1973, Mr. Hill joined the staff of the late U.S. Representative Ed Jones as Field Assistant, and later served as District Director until Jones' retirement. In 1988, Mr. Hill managed Congressman Tanner's campaign for Congress and in 1989, joined Tanner's staff as District Director, where he served for almost two decades. When he retired in 2008, Mr. Hill was the longest-serving Congressional district aide in Tennessee history. He is an avid outdoorsman, a member of the Free and Accepted Masons, the Goodwill Shrine Club, the Elks Club, the Tennessee Wildlife Federation, and the Methodist Church.

### **Lisa Jones**

Lisa Jones was appointed to the Board of Probation and Parole in March 2008. An educator, Ms. Jones' previous professional experience includes 12 years of teaching at Savannah High School. She also taught for two years at Jackson State University's Savannah campus and served a term as a member of the Unemployment Security Board of Review. Ms. Jones is a graduate of the University of North Alabama, where she earned a bachelor of science degree in education.

### **Chuck Taylor**

Chuck Taylor's career spans over 30 years in executive positions in both the public and private sectors. A native Memphian, he attended the University of Memphis, where he majored in Business Administration. His experience includes serving as Director of the Office of Faith Based Initiatives for the City of Memphis, Deputy Property Assessor for Shelby County, Director of Human Resources for Omni Care of Tennessee, Assistant VP of SPL LEDIC, and Senior VP of Amerithrift Financial. Taylor joined state government in 2003 as the Director of the Governor's Highway Safety Office and led the highway safety campaigns *Click It or Ticket* and *Booze It and Lose It*. While there, he received an Emmy Award from the Academy of Television Arts and Sciences for producing a GHSO public service announcement against drunk driving. In 2007 Mr. Taylor, who is a disabled Vietnam veteran, became the Assistant Commissioner of the Tennessee of Veterans Affairs. Mr. Taylor joined the Board of Probation and Parole in 2010.



## **MISSION STATEMENT**

**Our Mission Is To Minimize Public Risk And Promote Lawful Behavior By The Prudent, Orderly Release And Community Supervision Of Adult Offenders.**

## **VISION STATEMENT**

**The Board of Probation and Parole will be committed to a partnership with the citizens of Tennessee in promoting public safety and will be recognized as a leader in the area of probation and parole by:**

- 1. Providing a continuum of services for offenders from pre-sentence investigation through the expiration of sentences.**
- 2. Participating in cooperative efforts such as community policing, multi-purpose service centers, coordinated victim services and interagency efforts.**
- 3. Providing employees with access to and training in the use of advanced technologies.**
- 4. Fostering a highly professional staff that is proficient in offender management and support services.**
- 5. Promoting effectiveness and efficiency through the use of outcome measures and innovative approaches to service delivery.**

## **Historical Background**

On February 18, 1961, Governor Buford Ellington signed into law an act passed by the Eighty-Second Session of the General Assembly, placing a part-time Board of Probation and Paroles as a division of the Department of Correction. The Commissioner of Correction served as Chair and members were appointed from the business and education fields.

In 1963, legislation was passed increasing the size of the Board to five part-time members with the Governor appointing four of its members. In 1970, the Governor began appointing all five members, with the Commissioner of Correction no longer serving as Chair.

On April 4, 1972, Governor Winfield Dunn signed House Bill 582, creating the Tennessee Board of Pardons and Paroles with full-time three-members.

In 1979, the Ninety-First General Assembly presented to Governor Lamar Alexander the “Pardons and Paroles Reform Act of 1979”, which created an autonomous full-time Board functionally and administratively separate from any other agency. On May 25, 1979, Governor Alexander signed the “Pardons and Paroles Act of 1979” into law. With new autonomy came new and greater responsibilities. Previously, field staff had been under the supervision of the Department of Correction. On July 1, 1979, Parole Officers and support staff were placed directly under the supervision of the Board, the Executive Director, and the State Director of Paroles. The Governor appointed four members, two to terms of four years and two to terms of two years. Thereafter, all members were to be appointed or re-appointed to terms of six years.

In 1972, Charles Traughber was appointed as Chairman of the Board and was re-appointed as Chairman from June 1976 through June 1979. In January 1988, he was re-appointed to a six-year term on the Board and has served as Chair since.

In 1989, the Board was expanded from five members to seven members.

On May 18, 1999, Governor Don Sundquist signed House Bill 3307/Senate Bill 3305 which moved the Division of Probation and Community Correction Grant Programs from the Department of Correction and merged them with the Board of Paroles creating a new agency, the “Board of Probation and Parole” (BOPP) effective July 1, 1999.

## **About the Board and the Executive Director**

The Board of Probation and Parole is a full-time independent Board composed of seven members (three African American males, two Caucasian females, two Caucasian males) appointed by the Governor. The Board is charged with deciding which eligible felony offenders will be granted parole and released from incarceration to community-based supervision. Along with the supervision of those granted parole, the Board is also responsible for supervising felony offenders who are placed on probation by Criminal Courts (TCA 40-28-103).

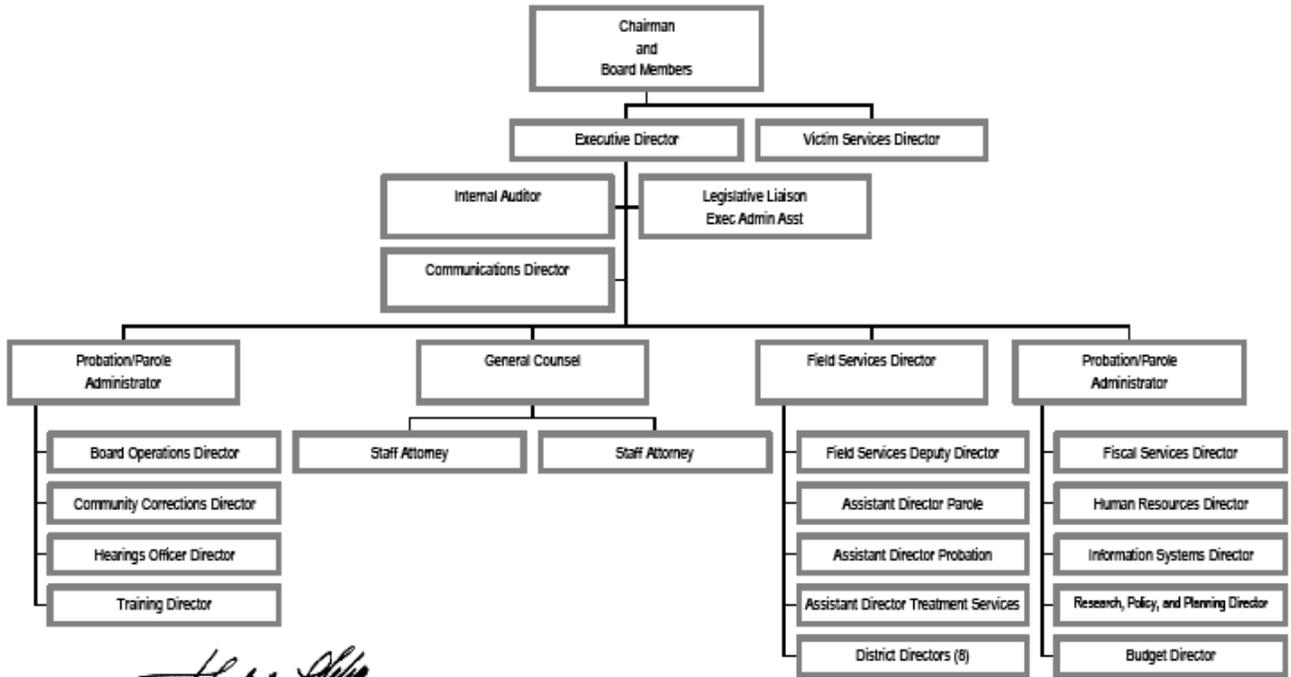
The administrative duties and responsibilities of the Board are to establish criteria for granting and revoking parole; to develop and adopt the planning documents, the annual budget, a staffing plan, and policies and procedures; to visit correctional institutions and maintain contact with criminal justice agencies and agency field staff; and to participate in regional, federal and local criminal justice planning efforts (TCA 40-28-104).

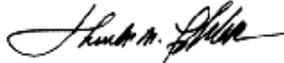
The Executive Director has responsibility for day-to-day functioning of the agency and for assisting the Board in the development and implementation of policies, procedures, planning documents, budgets and reports. The Executive Director is also responsible for recruitment and supervision of staff and for developing and maintaining communication and cooperation between the Department of Correction and the Board (TCA 40-28-104).

# Organizational Chart



STATE OF TENNESSEE  
**BOARD OF PROBATION AND PAROLE**  
 404 JAMES ROBERTSON PARKWAY, SUITE 1300  
 NASHVILLE, TENNESSEE 37243-0850  
 June 2010



APPROVED:   
 Charles M. Traughber, Chairman

## **About the Agency**

The Executive Director, two Probation and Parole Administrators, the Director of Field Services, the Communications Director, the Legislative Liaison, and the General Counsel provide the senior level management for the agency (one African American male, one African American female, two Caucasian females, and two Caucasian males). Each Administrator is responsible for assigned divisions as cited in the organizational chart (page 5) and each division has a Director. Currently one of our Probation and Parole Administrator positions is vacant. Along with the Board Members, the Executive Director, and support staff, the Agency has eleven administrative divisions. The eleven divisions are:

1. Parole Hearings Officers
2. Board Operations
3. Field Services
4. Human Resources
5. Budget Division
6. Fiscal Services
7. Research, Policy and Planning
8. Information Systems
9. Training
10. Legal Services
11. Community Corrections
12. Victim's Services

Of the Division Directors, two (17%) are African American females, four (33%) are Caucasian females, and six (50%) are Caucasian males.

The Division of Field Services includes eight statewide districts. Offenders in all the counties within the State of Tennessee are supervised through these offices. The eight Field Services district main offices are located in:

1. Johnson City
2. Knoxville
3. Chattanooga
4. Nashville
5. Murfreesboro
6. Jackson
7. Memphis
8. Clarksville

Each district has a director, two (25%) are African American females, two (25%) is Caucasian female, and four (50%) are Caucasian males.

As of June 30, 2011, the Agency employed 1111 employees. Of that number, 359 (33%) are African American, 736 (66%) are Caucasian, and 16 (1%) are classified as other. Of that number, 197 are managers/supervisors: 60 (30%) are African American, 136 (69%) are Caucasian, and 1 (1%) are classified as other.

As of April 30, 2010, the Agency employed 1093 employees. Of that number, 347 (32%) are African American, 726 (66%) are Caucasian, and 20 (2%) are classified as other. Of that number, 202 are managers/supervisors: 68 (32%) are African American, 138 (67%) are Caucasian, and 1 (1%) are classified as other.

Agency employees increased by 2% this fiscal year. The number of African Americans and Caucasians employed decreased, but the percentages remain approximately the same as the previous year. Those classified as others decreased, but the percentage remained the same. BOPP Manager/Supervisor positions decreased by 1% for African Americans and decreased 1% for Caucasians employed. Those classified as other remained the same. All employees are monitored for compliance and trained annually on Title VI. **(SECTION 11).**

## **On The Horizon**

The Board of Probation and Parole steps into its future reinforcing the use of evidence-based programs, practices and victim-centered approach to ensure community safety. The success of the Joint Offender Management Plan has increased both TDOC and BOPP's ability to obtain offender success making a difference in the reduction of recidivism. Some of the benefits of the joint plan have meant joint training of staff, both agencies use of the same validated assessment tool, enhanced communication, and safer communities through collaboration. BOPP's victim-centered approach has solidified its re-entry process leading to victim advocacy groups seeing the relevance of our work to their goals.

### **Office of Victim Liaison Services**

The Office of Victim Liaison Services responds to requests from victims of offenders under the Board of Probation and Parole's supervision. The Office ensures victim notification, in accordance with TCA 40-28-505 and victim confidentiality is in accordance with TCA 40-38-110. The Office is comprised of 15 District Victim Coordinators in each of the eight districts across the state. Coordinators provide information, referrals, and attend hearings with victims.

### **Victim Impact Program**

The Victim Impact program is a 12-week evidence based educational program designed toward helping offenders become more aware of the impact that crime has on victims and to take responsibility for their actions and begin to make amends. Offenders are taught how crime affects the victim and the victim's family, friends, and community. They are taught how it also affects them and their own families, friends, and communities. Specific modules address property crimes, sexual assault, domestic violence, child abuse and neglect, elder abuse and neglect, drunk driving, drug-related crimes, gang violence, and homicide. Research has demonstrated that this program may aid in the offender's self-accountability and decrease further criminal activity.

### **Domestic Violence Training**

BOPP trained 32 facilitators on domestic violence. This is a two part educational program designed to teach female offenders, who are also victims of domestic violence, about the dynamics of domestic violence and sexual assault, as well as its impact on children. The goal of the program is to assist female offenders on probation/parole with re-entry issues that stem from family violence and to link them with community resources who can provide needed services to ensure their safety.

### **Courage to Change**

BOPP provides an evidence-based batterers' intervention program in offices across the state. The 24-week program is an innovative and multi-disciplinary course with a curriculum that explores male violence against women, challenges men to take responsibility for their actions, and provides educational experiences to become allies in ending violence against women. Experts have conducted a variety of studies to determine the effectiveness of these programs. Most agree that "effectiveness" means the cessation of abuse. The studies concluded they have a "modest but positive" effect upon violence prevention. While the effect is modest, findings show that they reduce the danger of physical violence.

### **Level of Service Case Management Inventory (LSCMI)**

The LSCMI is a nationally recognized, research-based risk and need assessment tool for adult offenders. It is the fourth generation of the LSI (or Level of Service Inventory), one of the best-validated risk/need instruments in corrections. It uses sound research to determine level of supervision and level and types of service/treatment, allowing us to target supervision, services and treatment to the individual's criminogenic needs (those needs which show a direct correlation to criminal behavior). The Tennessee Department of Correction, the Board of Probation and Parole, and Community Corrections are using the LSCMI, in order to create a continuity of services, as the offender transitions through the criminal justice system. Each agency's LSCMI assessment of the offender's needs, as well as the history of previous treatment/program referrals made to address these needs are anchored in Tennessee Offender Management Information System (TOMIS), allowing agencies the ability to access and review the entire continuum.

### **Motivational Interaction**

As part of the Joint Offender Management Plan, BOPP is utilizing Motivational Interaction methods in working with offenders. Motivational Interaction is an evidence-based practice that, when incorporated into supervision practices, has been shown to improve offender success rates. It is an interview style in which the interviewer interacts positively with an offender, based on a belief that people have the capacity to change when there is a collaborative effort that respects their autonomy to make self-improving choices. Motivational Interaction is a way of talking with a person to build their internal motivation for change through the use of open-ended questions and strategic statements. It is a person-centered method of fostering change by helping a person explore and resolve ambivalence and move toward positive change.

### **Thinking for Change (T4C)**

BOPP is developing in-house offender treatment resources in an effort to improve offender access to programs that will address their identified criminogenic needs. One of the programs being brought into use is "Thinking for Change" (T4C). T4C is an evidence-based, integrated cognitive behavior change program for offenders that includes cognitive restructuring, social skills development, and development of problem solving skills, which teaches them to restructure their thinking patterns, leading to positive change in behavior.

### **Domestic Violence Program – Positive Changes**

This is a two-part educational program designed to teach female offenders, who are also victims, about the dynamics of domestic violence and sexual assault, as well as its impact on children. Classes are taught as part of BOPP's gender-specific program, which is a specialized program for female offenders that assist this population in overcoming their unique barriers and building self-esteem. You Have The Power designed the curriculum and trained the BOPP's Forensic Social Workers and gender specific Probation and Parole Officers on the implementation of the curriculum. The goal of the program is to assist female offenders on probation/parole with re-entry issues that stem from family violence and to link them with community resources who can provide needed services to ensure their safety.

### **Interactive Offender Tracking**

The use of The Interactive Offender Tracking System for low-risk offenders allows BOPP to follow what evidence-based research has concluded to place more focus and energy on medium and high-risk offenders through a validated assessment tool. These offenders have been determined not to require the traditional face-to-face reporting and close supervision. They have already proven they are trying to successfully complete their supervision and become productive citizens. This system is a web-based phone-in program, which allows offenders to phone in each month and answer a series of questions that are programmed in each month specific to their cases. Offenders in the system pay a monthly fee presenting no cost to the State.

### **Treatment Services Network**

Research has confirmed that alcohol and drug related problems play a significant role in criminal behavior. To collectively address these issues, the Treatment Services Network (TSN) was developed in FY 2010 in collaboration with the Tennessee Department of Mental Health as a key component of the Joint Offender Management Plan. The TSN is the umbrella by which offenders receive essential services through collaboration between multidisciplinary professionals, agencies, organizations, and government. Within the Treatment Services Network, the FSW, along with BOPP staff, are an indispensable component of the network, in which each directly relates to the success of the Joint Offender Management Plan. Beginning in FY2011, an appropriation of \$4,103,000.00 will provide funding to allow BOPP to obtain critical alcohol and drug treatment services for those offenders under supervision who have been determined to be at high risk to recidivate due to substance use. The network is a collaborative assessment, referral, follow-up, and evaluation process between the Probation/Parole Officer, Forensic Social Worker, community treatment collaborative (CTC), service providers, and other agencies and organizations. The CTC and FSW provide evidence-based and innovative approaches to offender rehabilitation within the Treatment Service Network.

In utilizing evidence-based practices and setting new standards, BOPP strives to reduce recidivism rates and provide for better community relations and public safety.

### **Forensic Social Work Program**

Our mission as Forensic Social Workers (FSW) for the Board of Probation and Parole is to provide comprehensive assistance to offenders who are currently placed on supervision by the Board of Probation and Parole. The FSW seeks to advocate for and assist the offender in gaining access to needed treatment services deemed essential for the efficacy of sustainable re-entry into the community. The treatment focus is the utilization of a holistic approach that addresses “criminogenic factors” through a continuum of treatment services. The Level of Service Case Management Inventory (LS/CMI) instrument initiates a referral to the FSW from the PPO. However, at any time during supervision, the PPO can refer to the FSW due to presenting problems associated with high risk factors. In keeping with the goals of the Joint Offender Management Plan and in recognition of the correlation of recidivism to “criminogenic factors”, FSW involvement is essential in providing offender treatment services. When offered holistic treatment services, in conjunction with supervision, there is opportunity for sustainable re-entry and therefore ensuring public safety. With the assistance of the FSW, motivational enhancement, advocacy, and support, the offender is better equipped to make positive life changes and achieve sustainability. As part of the JOMP, BOPP has undertaken a new and innovative approach to offender rehabilitation through providing “in-house” treatment services, as well as referral to community services in the creation of the Treatment Services Network.

### **Relapse Prevention**

The Forensic Social Workers facilitate evidence-based in-house groups in their assigned BOPP field locations. *The Relapse Prevention* group is based on the philosophical tenants and implementation strategies as outlined in the *Counselor’s Manual for Relapse Prevention with Chemically Dependent Criminal Offenders, DHHS Publication No. (SMA) 96-3115*. The above-mentioned approach utilizes a developmental approach to recovery. A systematic method of instruction is employed that is designed to educate the recovering offender about alcohol and drug use and assist with identifying and managing relapse warning signs. There may be individuals who are experiencing alcohol and drug cravings, in which relapse prevention is key to maintaining sobriety. The target population for the *Relapse Prevention* group are offenders on supervision with the State of Tennessee, Board of Probation and Parole and are identified as medium to very high-risk through the Level of Service/Case Management Inventory (LS/CMI), Administrative Case Review Committee (ACRC), Court Order, or as referred by Probation and Parole Officers. This group is based on 12-week sessions, co-ed and closed. The groups are evaluated on an ongoing basis to determine offender needs and challenges.

### **Anger Management**

The Forensic Social Workers facilitate evidence-based in-house *Anger Management* groups in their assigned BOPP field locations. The *Anger Management* group utilizes a combined cognitive-behavioral therapeutic approach that utilizes cognitive and communication skills intervention, as well as relaxation techniques. This approach is based on *Anger Management for Substance Abuse and Mental Health Clients: A Cognitive Behavioral Therapy Manual, DHHS Publication No. (SMA) 07-4213*. The target population for the *Anger Management* groups are offenders on supervision with the State of Tennessee, Board of Probation and Parole and are identified as medium to very high-risk through the Level of Service/Case Management Inventory (LS/CMI), Administrative Case Review Committee (ACRC), Court Order, or as referred by Probation and Parole Officers. The groups are based on 12-week sessions, co-ed and closed. The groups are evaluated on an ongoing basis to determine offender needs and challenges.

### **Employment Specialists**

Every day in Tennessee, ex-offenders reenter society — some from jail, and others from prison. Getting those ex-offenders into full-time employment quickly benefits everyone: the community, employers, the ex-offenders and their families. In an effort to address this need, BOPP began an employment development initiative in November 2009 by placing an Employment Specialist in four cities: Memphis, Nashville, Chattanooga and Knoxville. The Employment Specialists focus on employer development and development of a job-ready offender pool. Employment Specialists provide job readiness classes for offenders, screening and referral for employers and work within the community developing partnerships with local agencies to provide training and other employment-related services for offenders.

## **Resource Centers**

The Agency mission and vision statements encompass the concept of coupling supportive community supervision and offender accountability. To be successful in carrying out the mission and vision statements, both components must be in place. Offender resource centers have been established, or are in the process of being established, across the state to provide services beyond basic supervision to offenders and serve as an outreach mechanism to local communities. No additional funding is required, as existing resources of the agency are used to support the Resource Centers. In the past, Resource Centers are located in the Knoxville, Memphis, and Nashville offices. A new Resource Center was added this year in Jackson.

Title VI literature is available to those who are served in the program.

Staff and volunteers teach the following classes:

- Anger Management/Domestic Violence
- GED
- Adult Literacy
- Job Readiness
- J.O.B.S. Newsletter
- Project Craft
- Thinking for a Change
- Basic Parenting
- Basic Computer Skills
- Advanced Computer
- Computer Applications
- Financial and Consumer Management
- Life Skills
- Responsible Fatherhood

## **Community Corrections Grant Program**

In 1985, the legislature created the Community Corrections Grant Program in a special session to address prison over crowding. The Community Corrections Grant Program diverts felony offenders from the prison system and provides supervision and services to the offenders. The Community Corrections programs are varied statewide and designed to serve the needs of the local communities and judicial districts. Local advisory boards approve policies and procedures based on state standards and rules. The boards are made up of law enforcement staff, Criminal Court Judges, Public Defenders, District Attorneys, Sheriffs and other interested citizens. The grant programs are funded by the State through the Board of Probation and Parole. Programs are reimbursed monthly. The total for Community Corrections awarded contracts was \$40,250,796 over a three-year contract period. Of this amount \$3,446,502 (about 8.5%) was awarded to minority programs. The goal of the Community Corrections Grant Program is to reduce the probability of criminal behavior while maintaining the safety of the community in a cost effective manner. The Community Corrections Agencies incorporate offender treatment services into their programs.

**SECTION 2 – Federal Programs or Activities**

All Federal Funds within the Board of Probation and Parole are grants for specific projects and come from Federal Criminal Justice Programs through the Office of Criminal Justice Programs 317.06:

1. **Recovery Support Services Program :** A treatment services network for substance abuse treatment for offenders contracted through the Department of Mental Health.....\$282,700
2. **Board Of Probation and Parole Professional Development and Domestic Violence :** Staff training for a Batter’s Intervention Program .....\$25,000 State and \$75,000 Federal
3. **Criminal Justice Technology Improvement through Software:** Funds for the Division of Field Services creation of a computer dashboard to improve offender status monitoring with new software and research division computer equipment for the monitoring and analyzing offender treatment programs’ effectiveness .....\$206,400

**SECTION 3 - Organization of the Civil Rights Office/Coordinator**

The Board’s Civil Rights Coordinator Brenda Osborne is supervised by the Board’s Director of Human Resources and the District Staff Title VI Coordinators are designated by the District Directors and supervised by district management.

**TITLE VI COORDINATORS**

NAME	DISTRICT	OFFICE	RACE/ETHNICITY & GENDER
Brenda Osborne		Central Office	Black / Female
Norita Jill Cooper	1	Johnson City	White/ Female
Pam Upton	2	Knoxville	Black / Female
Kevin Adkins	3	Chattanooga	White / Male
James Fields	4	Nashville	Black / Male
Benjamin J. Arnell	5	Murfreesboro	Black /Male
Brenda Kaye Cole	6	Jackson	White / Female
Tavia Gilmore-Thomas	7	Memphis	Black / Female
Bobby Smith	8	Clarksville	White / Male
Donna Burke		Community Corrections	White / Female

**Coordinator’s Role**

The Executive Director or designee appoints the Title VI Coordinators. Coordinators review and ensure response to any allegation of violation. The Director of Community Corrections or designee acts as the Coordinator for the Community Corrections Grant Programs. The Executive Director also appoints a Coordinator in Central Office, whose responsibilities includes but is not limited to:

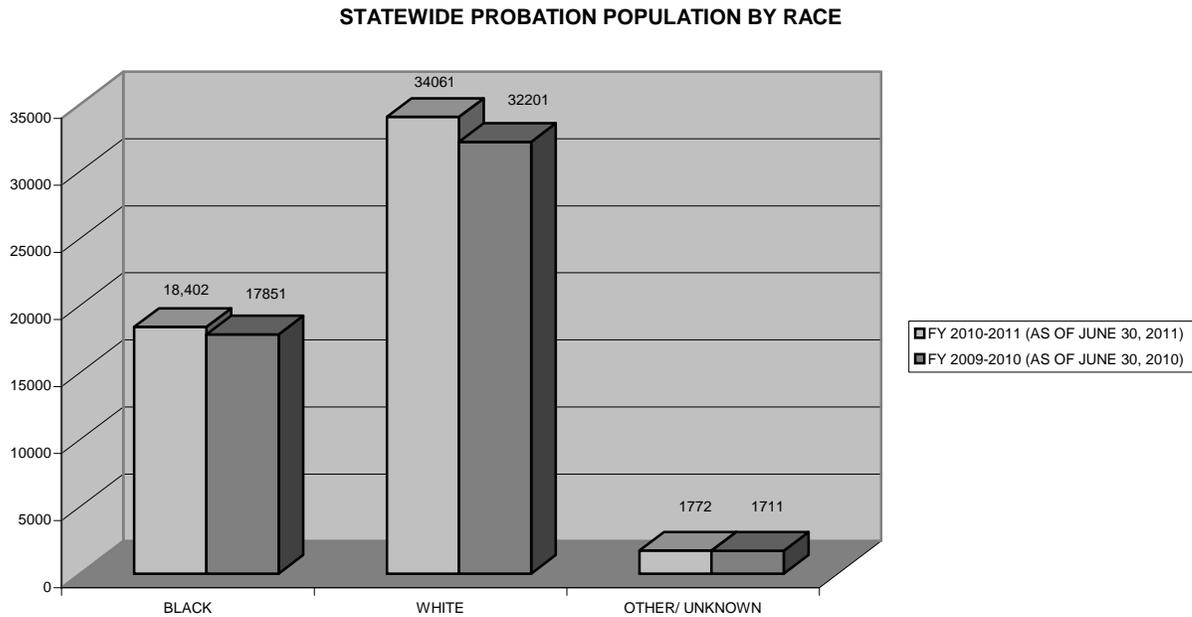
- Handling claims filed in Central Office;
- Filing and tracking all claims statewide;
- Coordinating with the Agency’s Internal Investigator on all Title VI claims being investigated;
- Preparing the annual report for the Governor’s Office (Title VI Implementation Plan);
- Providing support for the Coordinators in the districts; and
- Developing current materials for annual mandatory training about Title VI and LEP.

# SECTION 4 – Data Collection and Analysis

## BOPP Results July 10-June 11

No Title VI complaints were reported during this time period. There are no Title VI Lawsuits with the Board of Probation and Parole at this time.

The BOPP strives to have an employee base reflective of the community it serves. In the Nashville offices alone the nationalities represented are: Russia, Jamaica, India, Egypt, Ireland, Ethiopia, Philippines, Nigeria, Ghana, Columbia, and Mozambique. BOPP will continue to make every effort to equally serve offenders and the community through services provided by this agency.

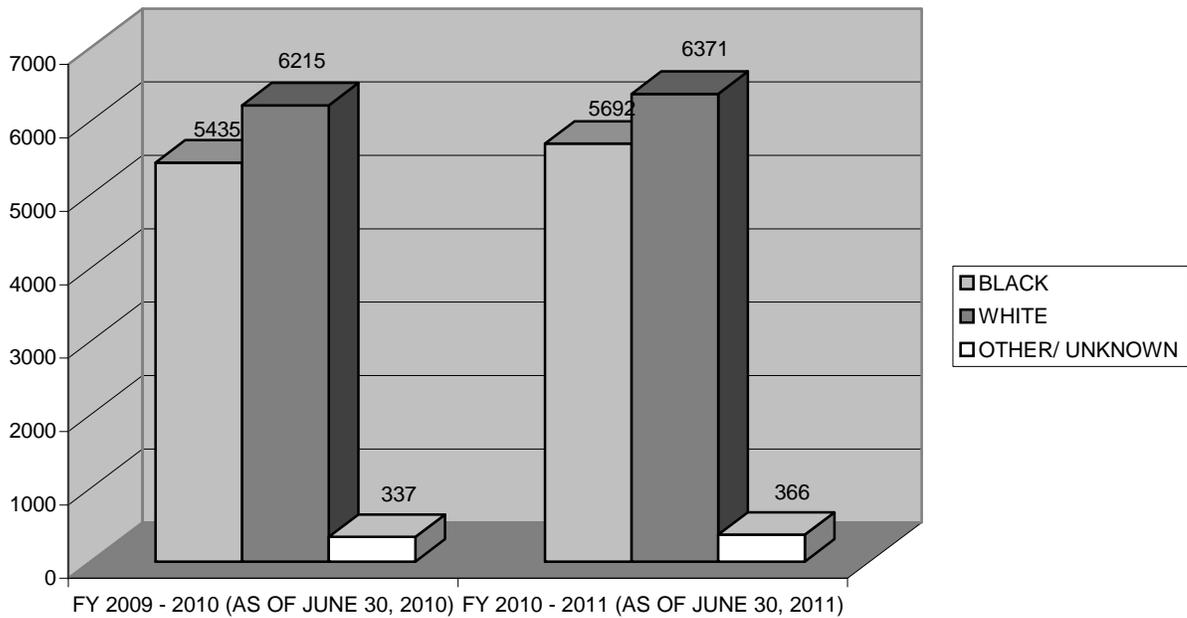


The total probation population as of June 30, 2011 was 54,235. The population by race/ethnicity was 33.9% African American, 62.8% Caucasian, and 3.26% classified as other.

The total probation population as of June 30, 2010 was 51,763. The population by race/ethnicity was 35% African American, 62% Caucasian, and 3% classified as other.

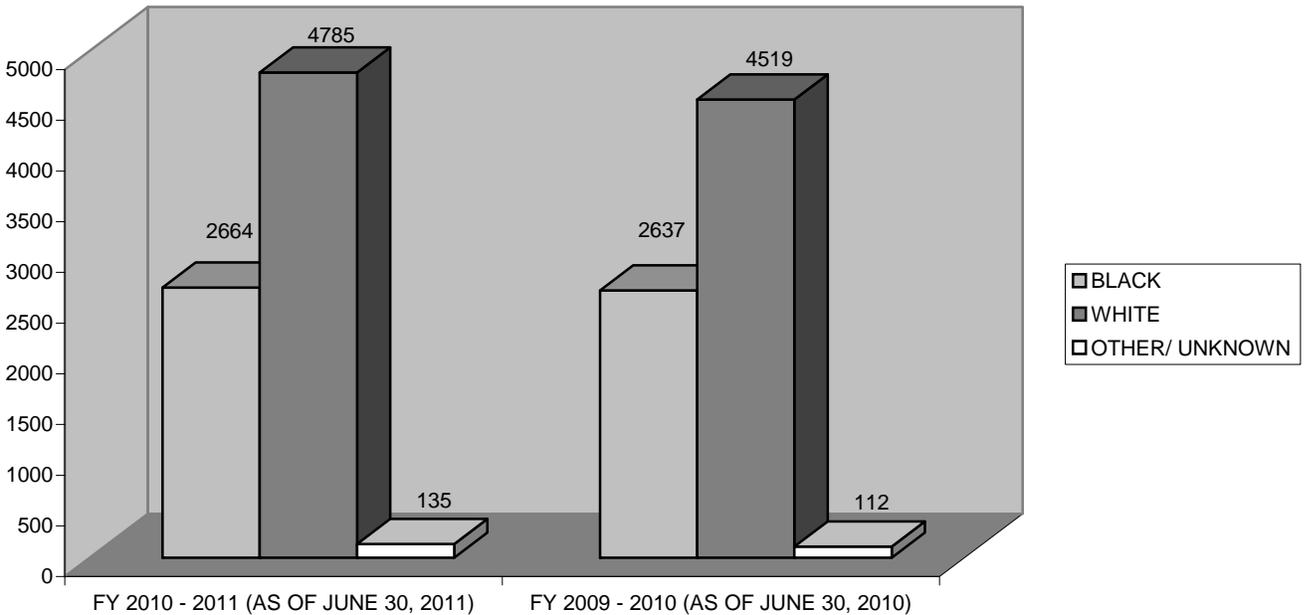
The total population increased by 4.5%. The percentage of African Americans decreased by 1.1%, Caucasians increased by .8% and other increased by .26%.

**STATEWIDE PAROLE POPULATION BY RACE**



The total parole population as of June 30, 2011 was 12,429. The population by race/ethnicity was 45.79% African American, 51.25% Caucasian and 2.9% classified as other. The total parole population as of June 30, 2010 was 11,987. The population by race/ethnicity was 46% African American, 51% Caucasian and 3% classified as other. The total population increased by 3.5%. The percentage of African Americans decreased by .21%, Caucasians increased by .25% and other decreased by .1%.

**STATEWIDE COMMUNITY CORRECTION POPULATION BY RACE**



The total Community Corrections population as of June 30, 2011 was 7,584. The population by race/ethnicity was 35.12% African American, 63.09% Caucasian and 1.78% other.

The total Community Corrections population as of June 30, 2010 was 7,268. The population by race/ethnicity/ethnicity was 34.96% African American, 63.83% Caucasian and 1.2% other.

The total population increased by 4.16%; however, the percentages regarding race/ethnicity was changed with an increase of .16% in African American, and with decreases by .58% in the category other and .74% in the category Caucasian.

**Community Corrections Resource Centers – Populations Served:**

Community Resource Centers Offenders Served	African American	Caucasian	Hispanic	Asian	American Indian And Others	Total served: July 10- June 11
District 1	2	52	1	0	0	55
District 2	215	583	3	1	1	803
District 3	105	119	2	0	1	227
District 4	335	157	2	2	1	497
District 5	78	150	0	1	1	206
District 6	40	71	0	0	0	111
District 7	584	71	16	3	0	674
District 8	48	112	0	0	0	160
<b>TOTALS</b>	1407	1315	24	7	4	2733
Community Resource Centers Offenders Served	African American	Caucasian	Hispanic	Asian	American Indian And Others	Total served: June 09 - June 10
Jackson	50	39	4	1	3	97
Knoxville	26	166	4	0	0	196
Memphis	488	103	1	0	0	592
Nashville	307	120	1	1	1	430
<b>TOTALS</b>	871	428	10	2	4	1315

## **SECTION 5 – Definitions**

**ADA:** Americans with Disabilities Act.

**Agency:** Any of the several federal Departments or independent agencies having Title VI responsibilities.

**Applicant:** One who submits an application, request, or plan required to be approved by a Department official, or by a primary recipient, as a condition of eligibility for federal financial assistance.

**Assurance:** A written statement or contractual agreement signed by the agency head in which a recipient agrees to administer federally assisted programs in accordance with civil rights laws and regulations.

**Beneficiaries:** Those persons to whom assistance, services, or benefits are ultimately provided, also known as clients.

**BOPP:** The Tennessee Board of Probation and Parole.

**Civil Rights Compliance Reviews:** Regular systematic inspections of agency programs conducted to determine regulatory compliance with civil rights laws and regulations. Compliance reviews determine compliance and noncompliance in the delivery of benefits and services in federally assisted programs. They identify problems, such as denial of full benefits, barriers to participation, different treatment, lack of selection to advisory boards and planning committees, lack of information, and denial of the right to file a civil rights complaint. Compliance reviews may be conducted on-site or through desk audits.

**Complainant:** Any person who believes himself or any specific class of individuals to be subjected to discrimination prohibited by Title VI and makes or initiates the complaint in a legal action or proceeding.

**Complaint:** A verbal or written allegation of discrimination which indicates that any federally-assisted program is operated in such a manner that it results in disparity of treatment to persons or groups of persons because of race, color, or national origin.

**Compliance:** The fulfillment of the requirements of Title VI, other applicable laws, implementing regulations and instructions to the extent that no distinctions are made in the delivery of any service or benefit on the basis of race, color, or national origin. (See also conciliatory agreement and noncompliance.)

**Compliance Review:** See Civil Rights Compliance Reviews.

**Conciliatory Agreement:** A voluntary agreement between a federal agency and the state or between the state and a sub-recipient that provides for corrective action to be taken by a recipient to eliminate discrimination in any program receiving federal assistance.

**Contractor:** A person or entity that agrees to perform services at a specified price.

**Desk Audit:** A desk audit is a structured paper review of statistical and narrative information submitted by recipients or agency program offices of compliance information obtained before or without going on-site, and conducted according to review procedures. Desk audits include routine reviews of assurance forms or other documents to ensure that they have been properly completed.

**DHHS:** U.S. Department of Health and Human Services.

**Discrimination:** To make any distinction between one person or group of persons and others, either intentionally, by neglect, or by the effect of actions or lack of actions based on race, color, national origin.

**Federal Assistance:** Any funding, property, aid, technical assistance, grants, or partnerships provided for the purpose of assisting a beneficiary. This assistance may be provided in the form of grants, contracts, cooperative agreements, loans, loan guarantees, property, interest subsidies, insurance, direct appropriations, and other non-cash assistance. It includes assistance received directly from federal agencies, or indirectly through other units of state and local governments.

**Minority:** A person or groups of persons differing from others in some characteristics and often subjected to differential treatment on the basis of race, color, or national origin.

**Noncompliance:** Failure or refusal to comply with Title VI of the Civil Rights Act of 1964, other applicable Civil Rights laws, and implementing Departmental regulations (See compliance.)

**Parity:** The proportion of minority participation to the minority eligible population of a service delivery point is the same as the proportion of non-minority participation to the non-minority eligible population of the same delivery point.

**Post-award Review:** A routine inspection of agency programs during and after federal assistance has been provided to the beneficiary or recipient. These reviews may be cyclical or based on a priority system contingent upon the potential for noncompliance in individual programs. Reviews are normally conducted through on-site visits; however, desk audits and other mechanisms may also be used to assess operation of federally assisted programs. A post-award review may result in a written report that shows the compliance status of agency program offices and recipients. When necessary, the report will contain recommendations for corrective action. If the program office or recipient is found to be in noncompliance, technical assistance and guidance must be provided to bring the recipient into voluntary compliance. If voluntary compliance cannot be secured, formal enforcement action is then initiated.

**Potential Beneficiaries:** Those persons who are eligible to receive federally assisted program benefits and Services.

**Pre-award Review:** A desk audit of the proposed operations of a program applicant for federal assistance prior to the approval of the assistance. The Department must determine that the program or facility will be operated such that program benefits will be equally available to all eligible persons without regard to race, color, or national origin. The applicant may provide methods of administering the program designed to ensure that the primary recipient and sub-recipients under the program would comply with all applicable regulations, and correct any existing or developing instances of noncompliance. If the documentation provided by the applicant for the desk audit is inadequate to determine compliance, then an on-site evaluation may be necessary.

**Primary Recipient:** Any recipient who is authorized or required to extend federal financial assistance to another recipient for the purpose of carrying out a program.

**Program:** Any program, project, or activity for the provision of services, financial aid, or other benefits to individuals, or for the provision of facilities for furnishing services, financial aid, or other benefits to individuals.

**Public Notification:** Process of publicizing information on the availability of programs, services and benefits to minorities and statements of nondiscrimination. This is attained through use of newspapers, newsletters, periodicals, radio and television, community organizations, and grassroots and special needs directories, brochures, and pamphlets.

**Recipient:** Any state, political subdivision of any state, or instrumentality of any state of political subdivision, any public or private agency, institution, or organization, or other entity or any individual in any state to whom federal financial assistance is extended, directly or through another recipient for any program, including any successor, assignee, or transferee thereof, but not including any ultimate beneficiary under such program.

**Secondary Recipient:** Any recipient that receives financial assistance to carry out a program through a primary recipient or other sub recipient.

**Service Delivery Point:** The place in which federally assisted program services or benefits are administered to the public.

**Sub-Recipients:** Is an individual and/or organization that receives Federal financial assistance from the direct recipient of Federal funds.

**Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d-4:** Federal law prohibiting discrimination based on race, color, or national origin. It covers all forms of federal aid except contracts of insurance and guaranty. It does not cover employment, except where employment practices result in discrimination against program beneficiaries or where the purpose of the federal assistance is to provide employment.

**Vendor:** An individual, group, public or private organization or institution, political entity, or commercial enterprise which, pursuant to any contract, agreement, or other arrangement with a recipient or sub recipient provides generally required goods or services which are used by or available to a beneficiary of a program.

## **SECTION 6 – Discriminatory Practices**

The Board monitors its local and central offices, as well as sub-recipients who use federal money to provide services. As part of in-service training, managers and sub-recipients are informed that an agency is in violation of Title VI when it:

1. Denies an individual service, aid, or benefits because of race, color, or national origin;
2. Provides only inferior or discriminatory service, aid, or benefits because of any individual's race, color, or national origin;
3. Subjects an individual to segregation or different treatment in relation to aid, services, or benefits because of race, color, or national origin;
4. Restricts or discourages individuals in their enjoyment of facilities because of race, color, or national origin;
5. Treats an individual differently because of race, color, or national origin in regard to eligibility for programs or services;
6. Uses criteria which would impair accomplishment of the Act's objectives or which would subject individuals to discrimination because of race, color, or national origin;
7. Discriminates against an individual in any program or activity that is conducted in a facility constructed even partly with federal funds;
8. Subjects an individual to discriminatory employment practices under any federal program intended to provide employment.

The Board vigorously investigates all allegations of discrimination based upon race, color, or national origin (See **Compliance Process – Section 8**).

## **SECTION 7 – Limited English Proficiency (LEP)**

In order to ensure compliance with Title VI, the Board has taken steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access when applying for and/or inquiring about our assistance programs. The most important step in meeting this obligation is to provide the language assistance necessary to ensure prompt access, at no cost to the person. The Board ensures that communication tools are provided to LEP offenders and victim customers (See **Appendix A – Language Interpretation Notice**). The following is a list of resources that the Board is using at this time:

1. Translating Services into Spanish as needed – All system-generated notices in for Program Operations have been translated and are available for use. *The Tennessee Foreign Language Institute* provides additional translation services as needed under state contract.
2. Bilingual Staff - BOPP has actively recruited and selected a diverse population of people seeking employment. Where available BOPP staff act as translators.
3. The Board uses a contract with *The Tennessee Foreign Language Institute* to provide interpreters in all areas of Tennessee. Our staff secures the contract interpreters by coordinating with their District/Division Directors, who in turn contacts the Contract Administrator in BOPP Fiscal. The

Contract Administrator arranges the details with the contracted vendor. The details of the procedures follow:

- A. The officer will interview each inmate prior to their parole hearing and at that time they will determine if the inmate/offender will need a translator for the hearing and interview.
  - B. If the inmate/offender is in need of a translator the officer will send a message to Correctional Program Director Priscilla Wainwright advising her that a translator is needed for an upcoming parole hearing. The officer will advise Ms. Wainwright the language needed for translation. Ms. Wainwright will contact the Foreign Language Institute and request interpreter services and notify the officer and the officer's program supervisor that services have been scheduled.
  - C. After services are provided the officer will contact Ms. Wainwright notifying her that the requested interpreter services were received.
4. In the past year BOPP staff have used contract Translation Services in 80 instances for the following languages:
- A. Spanish – 67 cases (During some of these appointments, the interpreter served more than one offender.
  - B. Albanian- 1 case
  - C. Somali - 1 case
  - D. Vietnamese – 10 cases
  - E. Tagalog- 1 case
5. In the past year three written documents have been translated from either English to Spanish or Spanish to English.

## **SECTION 8 – Complaint Procedures**

### **Complaint Processing Procedures**

Title VI complaints must be filed within 180 days of the alleged discriminatory act per Title VI laws and regulations at both state and federal levels. Complaints within the Board can be filed at any of the following three levels (**See Appendix E- Complaint under Title VI**):

- The local level (with the District Offices or the Central Office for the Board of Probation and Parole);
- The Tennessee Human Rights Commission; or
- The Department of Justice (Federal).

When a Title VI complaint is reported, written or verbal, the Executive Director appoints a staff person to review the matter and file a report (**See Appendix F – Report of Investigation Title VI**). The investigative report of the investigation may show either:

- The BOPP/person was found to be in violation of Title VI;
- The BOPP/person was not found to be in violation of Title VI; or
- The Title VI complaint was withdrawn.

If BOPP, one of its employees or vendors are found to be in violation of Title VI, the remedial action taken to ensure future compliance are noted in the report. A copy of the investigative report is provided in writing to the Executive Director, the Division Director, the complainant, and the Central Office Coordinator.

All parties involved in the complaint have the right to appeal the findings or results of the investigation (**See Appendix D – Appeal from Finding Title VI**). The appeal shall include:

- Name of the appellant;
- Date of the finding and the investigators name;
- Whether the finding was considered nondiscrimination or whether a remedial action is proposed;
- Who filed the original complaint and date filed;
- The name of the person or agency the appeal is against and the location; and
- The date the appeal was filed.

The withdrawal of a complaint must include the reason(s) and be signed by the complainant. (**Appendix C – Withdrawal of Complaint or Appeal for Fair Hearing Title VI**).

**SECTION 9 – Compliance Review**

**A. Pre-Award Procedures – Assurances & Data Collection. The Board of Probation and Parole, its sub recipients or contractors shall make available any compliance report to be reviewed by the THRC upon request.**

1. All Professional Services Contract or Grants must contain the following language:

**Item 9.A. -Model Language Clause included in all Professional Services Contracts or Grants - Nondiscrimination.** The Contractor hereby agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Contract or in the employment practices of the Contractor 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 Contractor shall, upon request, show proof of such nondiscrimination and shall post in conspicuous places, available to all employees and applicants, notices of nondiscrimination.

2. The Board requires all applicants for contracts/grants to agree to the Title VI Model Language Clause and provide semi-annual documentation to support their performance during the contract (**See Appendix J – Contractor Performance Assessment**).

**B. Post-Award Procedures – The Board’s Contract Administrator completes the BOPP Contractor Performance Assessment (Appendix J) on each contractor on a semi-annual basis. This documents their work to meet Title VI Goals. Internal Audit’s Annual inspection of Community Corrections Agencies (Quasi-Governmental) includes Title VI postings and training checks.**

**C. Minority Representation – The Board has thirty-three contracts (See Appendix K – Contractor Listing).**

**1. Total Federal Funding - \$564,100**

Fund Source	Agency	Project Title	Contract Period	Federal Funds
JAGARRA	STATE	Recovery Support Services Program	July 2010 - June 2011	\$282,700
JAGARRA	STATE	Crim Justice Tech Improvement Through Software	July 2010 - June 2011	\$206,400
JAG	STATE	BOPP Professional Development and Domestic Violence	July 2010 - June 2011	\$75,000
			TOTAL	\$564,100

**2. Total Contract Dollars - \$51,834,639.75**

**3. Contracts with/managed by African/Americans – 2 for \$3,446,502**

4. Contracts with/managed by Females – 3 for \$1,788,320

5. Contracts by Type:

a. Public Offered Corp	1
b. Privately Held Corp	1
c. Privately Owned Business	1
d. Non-Profit Corp	1
e. 501 © (3)	0
f. Non-Profit 501 © (3)	6
g. Limited Liability Corp	2
h. Government Agency	13
i. Quasi-Government Agency	6
j. N/A	2

6. Government and Quasi-Government Contracts represent \$29,393,353 which is 54.77% of the BOPP Contracts.

D. Public Notice and Outreach - The Board monitors all sub-recipients and/or contractors concerning their dissemination of information to the public on the following:

1. Posting and adhering to Title VI Nondiscrimination Policy;
2. Programs and services in accordance with Title VI guidelines;
3. Posting and following Title VI Complaint procedures;
4. Their minority participation on planning boards and advisory bodies.

E. Procedures for Noncompliance – The Board will take the following steps for action upon a finding of noncompliance of a sub-recipient and/or contractor:

1. Processing;
2. Reporting;
3. Resolution;
4. Enforcement of corrective actions;
5. Monitoring of programs;
6. Sanctions.

## **SECTION 10 – Compliance/ Noncompliance Reporting**

A. List of federal or state departments/ agencies furnished or shared BOPP’s Title VI Reports:

1. TN State Library and Archives
2. Government Publications Department, Memphis-Shelby County Public Library
3. University of Tennessee, Hodges Library – Serials Department
4. University of Memphis Libraries, Government Publications
5. Tennessee Legislative Reference Library

B. Federal reporting requirements - NONE.

## **SECTION 11 – Title VI Training**

All new employees receive training regarding the requirements of Title VI during their orientation with the Board.

Current employees receive training during their annual in-service training. Title VI in-service training was complete during the month of June 2011 in the format of online training provided by the agency's training division. Each person was required to sign a Board of Probation and Parole training roster to confirm completion of training. The training division provides the training, and monitors the rosters. The total number staff recorded as trained was 806. The next training sessions will begin in February 2012, and continue each quarter until May 2012.

New supervisors receive Title VI Training by the Director of Human Resources as part of their training and orientation as a supervisor/manager. Title VI refresher training is also part of the Annual Supervisory Refresher Training conducted in the January – May time frame each year. During the FY 2010-2011 within BOPP 108 supervisory staff received Title VI training.

The following Training/Orientation Outlines listing Title VI training are enclosed in the Appendices:

- A. Outline used in Central Office for “New Employee Agency and Division Orientation Overview” that includes Title VI. **(See Appendix I – Central Office New Employee Orientation Outline)**
- B. Outline used for Officers in the Field. Title VI is covered in the district/field pre-service training within 90 days for new officers during new employee orientation after they are hired. **(See Appendix H – Probation Parole Officer Orientation Checklist)**
- C. Outline used for support staff in the Field. Title VI is covered in the district/field for new support staff in the field within 90 days during new employee orientation after they are hired. **(See Appendix G – Field Staff Orientation Training Outline)**

## **SECTION 12 – Public Notice and Outreach**

**The Board and its secondary recipients inform the public about all available services and also their rights under Title VI. To accomplish this goal they have:**

- A. Displayed posters in all Board offices and facilities which inform the public about Title VI provisions and the Board's non-discriminatory policy;
- B. Informed eligible persons of new programs or changes in existing programs pertaining to eligibility benefits and services, including locations of facilities and service delivery points;
- C. Included civil rights requirements in all eligibility guidelines and made guidelines available to the public;
- D. Provided access to beneficiaries, potential beneficiaries, and applicants, including procedures for filing complaints, program information, and rights of beneficiaries and applicants as reflected in legislation, program regulations, directives, and written materials for distribution;
- E. Included in letters, announcements, and program information that the programs and opportunities are available to all without regard to race, color, or national origin.

**The governor appoints the Board's members on six-year terms of service. The appointments are staggered with two members appointed every two years. The Boards for the Community Corrections Agencies are elected officials in their respective counties.**

**The Board periodically sends news releases to minority media outlets such as The Tennessee Tribune, Tri-State Defender, Nashville Pride, Urban Journal, and Silver Star News. Our news releases go to numerous radio and TV stations with programming aimed at minority communities.**

## **SECTION 13 – Evaluation Procedures**

**The Board will be continuing to work toward its goals for Title VI Compliance by the following actions:**

- A. By complying with Title VI of the Civil Rights Act of 1964.
- B. By maintaining rule and policy compliance.
- A. By handling all Title VI grievances as prescribed by law, policy, and procedures.
- B. By providing all non-English speaking offenders with the written conditions of Board of Probation and Parole in their language and to use interpreters as needed.
- C. By assuring availability of literature at each worksite about Title VI and Language Interpretation for recipients and providers.
- D. By continuing the Agency’s effort to increase the number of minorities employed as staff and volunteering as Advisory Board Members for the Community Corrections agencies, by proactively contacting churches, community service organizations, colleges and universities, etc.
- E. By continuing monitoring Title VI compliance through the Board’s annual internal audit inspection process and Semi-Annual Contract Review of Title VI Compliance.
- F. By ensuring that every offender under BOPP supervision receives Form #BP0065 *Notice to Offender Of Non-Discrimination* from their Probation and Parole or Community Corrections, Officer. A copy of the form with all appropriate signatures affixed is to be placed in the offender case file. **(See Appendix C – Notice to Offender of Non-Discriminatory and Grievances and Reporting Requirements)**

### **The Board’s Accomplishments in 2010/11**

- A. BOPP has actively recruited and selected a diverse population of people seeking employment.
- B. BOPP has used translators in the Hearings process of the agency.
- C. Probation/Parole Officers use translating services and other officers fluent in languages to communicate with offenders who have LEP (Limited English Proficiency).

### **The Board’s Implementation Plan for Title VI Improvements in FY 2011/12**

- A. The Board will continue to distribute Title VI information to the community through the Resource Programs, the Victim Liaison Program, and community outreach in all areas of Tennessee.
- B. The Board will continue to actively recruit a diverse employment population by participating in community activities such as job fairs, university appearances and speaking to community and civic organizations.
- C. The Board will make and support efforts to diversify select boards and staff within Community Corrections.
- D. The Board will serve the community and offenders in a more effective way through the Joint Offender Management Plan with the Department of Correction.

## **SECTION 14 – Responsible Officials**

**Board of Probation and Parole  
404 James Robertson Parkway  
Parkway Towers Building, Suite 1310  
Nashville, TN 37243-0850**

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**Charles M. Traughber  
Chairman  
Board of Probation and Parole**

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**Brenda Osborne  
Human Resources Manager  
Title VI Coordinator**

# **APPENDICES**

APPENDIX – A

STATE OF TENNESSEE BOARD OF PROBATION AND PAROLE  
OFFICE OF THE EXECUTIVE DIRECTOR



404 James Robertson Parkway Suite 1300 Nashville, TN 37243-0850  
Phone: 615.741.1673



LANGUAGE INTERPRETATION  
TITLE VI CIVIL RIGHTS ACT 1964

<input type="checkbox"/> املا هذا المربع اذا كنت تقرأ أو تتحدث العربية.	Arabic
<input type="checkbox"/> ինչպե՞ս կարելի է կատարել այս լեզուներում, եթե խոսում կամ կարդում եք հայերեն:	Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন শু হলে এই বাক্সে দাগ দিন।	Bengali
<input type="checkbox"/> សូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	Cambodian
<input type="checkbox"/> Matka i kahhon komu un taitai pat un sang i Chamorro.	Chamorro
<input type="checkbox"/> 如果您具有中文閱讀和會話能力，請在本表格內標上X記號。	Chinese
<input type="checkbox"/> Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.	Creole
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	Croatian (Serbo-Croatian)
<input type="checkbox"/> Zaškriněte tuto kolonku, pokud čtete a hovoříte česky.	Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بدرستی، این مربع را علامت بگذارید.	Farsi



STATE OF TENNESSEE BOARD OF PROBATION AND PAROLE OFFICE OF THE EXECUTIVE DIRECTOR  
 LANGUAGE INTERPRETATION TITLE VI  
 CIVIL RIGHTS ACT 1964

<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	French	<input type="checkbox"/> Însennați această căsuță dacă citiți sau vorbiți Românește.	Romanian
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	German	<input type="checkbox"/> Поставьте этот квадратик, если вы читаете или говорите по-русски.	Russian
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	Greek	<input type="checkbox"/> Maka pe fa'ailoga le pusa lea pe afai e te faitau pe tusitusi i le gagana Samoa.	Samoan
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस गले पर चिह्न लगाएँ।	Hindi	<input type="checkbox"/> Обележите ovaj kvadratiћ uколико читате или говорите српски језик.	Serbian (Serbo-Croatian)
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	Hmong	<input type="checkbox"/> Označte tento štvorček, ak viete čítat' alebo hovoriť po slovensky.	Slovak
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	Hungarian	<input type="checkbox"/> Marque esta casilla si lee o habla español.	Spanish
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wemto makasaoka iti Hocano.	Hocano	<input type="checkbox"/> Markahan ang kahon na ito kung ikaw ay nagsasalita o nagbabasa ng Tagalog.	Tagalog
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	Italian	<input type="checkbox"/> ထိုကတ်ကားပေါ်တွင် သင်၏ မိခင်ဘာသာစကားကို ဖြည့်ပါ။	Thai
<input type="checkbox"/> 日本語を讀んだり、話せる場合はここに印を付けてください。	Japanese	<input type="checkbox"/> Faka'ilonga'i 'ae puha ko'eni kapau 'oku te lau pe lea 'ac lea fakatonga.	Tongan
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	Korean	<input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	Ukrainian
<input type="checkbox"/> ຖ້າທ່ານສາມາດຮູ້ ຫຼື ກ່າວພາສາລາວໄດ້.	Laotian	<input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانہ میں نشان لگائیں۔	Urdu
<input type="checkbox"/> Zaznacz tę kratkę jeżeli czyta Pan/Pani lub mówi po polsku.	Polish	<input type="checkbox"/> Xin đánh dấu vào ô này nếu quý biết đọc và nói được Việt Ngữ.	Vietnamese
<input type="checkbox"/> Assinale este quadrado se voce lê ou fala Português.	Portuguese	<input type="checkbox"/> צייכנט דעם קעסטל אויב איר שרייבט אדער ליינט אידיש.	Yiddish



# APPENDIX – C



STATE OF TENNESSEE  
BOARD OF PROBATION AND PAROLE  
OFFICE OF THE EXECUTIVE DIRECTOR



404 James Robertson Parkway Suite 1300 Nashville, TN 37243-0850  
Phone: (615) 741-1673

## WITHDRAWAL OF COMPLAINT OR APPEAL FOR FAIR HEARING TITLE VI CIVIL RIGHTS ACT 1964

Date: \_\_\_\_\_

To: \_\_\_\_\_

I, \_\_\_\_\_ hereby withdraw my

\*complaint or  \*\*appeal, filed \_\_\_\_\_ against

DATE

NAME OF PERSON OR AGENCY

LOCATION

Person with the Title VI complainant's name:

\_\_\_\_\_

Person with the Title VI complainant's address:

\_\_\_\_\_

Reason for withdrawal:

Signed \_\_\_\_\_

\*Check appropriate term, Complaint or Appeal

\*\*Appeal from finding

BP0191 (REV 11/2007)

RDA S836-1b

APPENDIX – D



STATE OF TENNESSEE  
BOARD OF PROBATION AND PAROLE  
OFFICE OF THE EXECUTIVE DIRECTOR



404 James Robertson Parkway Suite 1300 Nashville, TN 37243-0850  
Phone: (615) 741-1673

APPEAL FROM FINDING  
TITLE VI CIVIL RIGHTS ACT 1964

I, \_\_\_\_\_ wish to appeal the finding made on

NAME OF APPELLANT

\_\_\_\_\_ by \_\_\_\_\_

DATE

NAME OF INVESTIGATOR

of  non-discrimination or  the proposed remedial action by the

agency in the Title VI complaint as filed by \_\_\_\_\_

PERSON WITH TITLE VI COMPLAINT

on \_\_\_\_\_ against \_\_\_\_\_

DATE OF FILING

PERSON OR AGENCY

at \_\_\_\_\_

LOCATION

Signed: \_\_\_\_\_

APPELLANT

\_\_\_\_\_

ADDRESS

\_\_\_\_\_

DATE OF APPEAL

**APPENDIX – E**



**STATE OF TENNESSEE  
BOARD OF PROBATION AND PAROLE  
OFFICE OF THE EXECUTIVE DIRECTOR**



404 James Robertson Parkway Suite 1300 Nashville, TN 37243-0850  
Phone: (615) 741-1673

**COMPLAINT UNDER TITLE VI  
CIVIL RIGHTS ACT OF 1964**

Date: \_\_\_\_\_

To: \_\_\_\_\_ BOPP

I, \_\_\_\_\_ hereby file an official  
complaint against

NAME OF PERSON WITH TITLE VI COMPLAINT

NAME OF PERSON OR AGENCY

LOCATION

Person with the Title VI complainant's name:

\_\_\_\_\_

Person with the Title VI complainant's address:

\_\_\_\_\_

Basis of complaint:

Date of alleged discrimination: \_\_\_\_\_

Signed: \_\_\_\_\_  
SIGNATURE OF PERSON WITH TITLE VI COMPLAINT

SECTION BELOW TO BE COMPLETED BY BOPP TITLE VI COORDINATOR

Referred to \_\_\_\_\_ ON \_\_\_\_\_  
LOCAL COORDINATOR DATE

for an investigation and report. \_\_\_\_\_  
SIGNATURE OF BOPP TITLE VI COORDINATOR

APPENDIX – F



STATE OF TENNESSEE  
BOARD OF PROBATION AND PAROLE  
OFFICE OF THE EXECUTIVE DIRECTOR



404 James Robertson Parkway Suite 1300 Nashville, TN 37243-0850  
Phone: (615) 741-1673

REPORT OF INVESTIGATION  
TITLE VI CIVIL RIGHTS ACT 1964

I, \_\_\_\_\_ representing \_\_\_\_\_  
LOCAL TITLE VI COORDINATOR NAME OF LOCATION

have investigated the complaint filed on \_\_\_\_\_ by \_\_\_\_\_  
DATE

\_\_\_\_\_ alleging that discrimination occurred  
NAME OF PERSON WITH THE TITLE VI COMPLAINT

that was in violation of the provisions of Title VI of the Civil Rights Act 1964.

The results of the investigation were as follows:

- The agency or person was found to be in violation of Title VI.
- The agency or person was not found to be in violation of Title VI.
- The person with the Title VI complaint withdrew the complaint using form BP0190.

A COPY OF THE INVESTIGATION REPORT MUST BE ATTACHED

NOTE: If the agency or person was found to be in violation of Title VI briefly describe the remedial action taken to assure future compliance:

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE OF LOCAL COORDINATOR

# APPENDIX – G

## BOPP Field Staff Orientation Training Outline

NAME: \_\_\_\_\_ SSN \_\_\_\_\_

Hire Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_

<u>TOPICS</u>	<u>SUGGESTED TRAINER</u>	<u>TIME</u>	<u>TRAINER'S INITIALS</u>
General Orientation	District Director	3 hours	_____
Office Orientation	Supervisor	4.5 hours	_____
Personnel Issues	Admin Sec/ Human Resources Technician	7.5 hours	_____
Computer Assignment	Info.Sys.Specialist	7.5 hours	_____
BOPP Overview	CBT*	1 hour	_____
TDOC Overview	CBT*	1 hour	_____
Edison Training	CBT*	1.5 hours	_____
Cyber Academy	CBT*	1 hour	_____
Automated Forms	Supervisor	3.5 hours	_____
Overview of Programs	Supervisor	4 hours	_____
Training/Title VI	Training Coordinator	1.5 hours	_____
Leave Procedures	Timekeeper	2.5 hours	_____
Supplies & Forms	Account Clerk	3.5 hours	_____
	<b>TOTAL</b>	<b>40 HOURS</b>	<b>(*computer based training)</b>

I hereby certify that I have received at least 40 hours of orientation and have been given the opportunity to ask questions for clarification when needed.

**EMPLOYEE SIGNATURE**

**DATE:**

Upon completion, please return entire packet to your Training Coordinator.

# APPENDIX – H

## Probation and Parole Officers Staff Orientation - Checklist

SETTING UP OFFICE / Account Clerk or Support Staff (1.5 HOURS)

TRAINER SIGNATURE \_\_\_\_\_

EMPLOYEE SIGNATURE \_\_\_\_\_ DATE: \_\_\_\_\_

- Travel Claims
- Business Cards
- Copy and FAX Machines
- Supplies and Equipment

## SUPERVISOR ORIENTATION / Supervisor or Manager (6 HOURS)

TRAINER SIGNATURE \_\_\_\_\_

EMPLOYEE SIGNATURE \_\_\_\_\_ DATE: \_\_\_\_\_

- Responsibility to BOPP / Ethics Policy/Title VI
- Assignment of office
- Introduction to staff
- Staff meetings
- Work assignments (due dates, etc.)
- Scheduling appointments / Court dates / Priorities
- Compliance reports
- Interim Reviews and Performance Evaluations
- Community demeanor
- Use of credentials (badge, ID, etc.)
- Office security
- Officer safety
- Assignment of caseload
- Drug screen procedures
- Travel permits
- Home checks
- Special condition monitoring
- Standards of supervision
- Assessments / Reassessments
- Fees and exemptions
- Record checks
- Violation policy
- Other \_\_\_\_\_

## APPENDIX – I

### NEW EMPLOYEE AGENCY AND DIVISION ORIENTATION BOARD OF PROBATION AND PAROLE OVERVIEW (Central Office Staff)



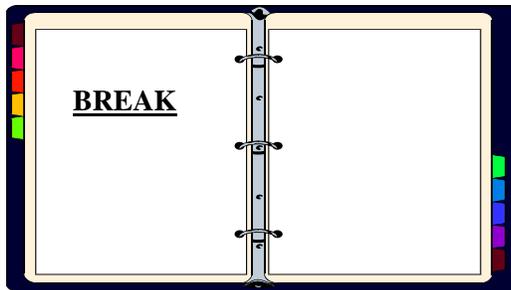
**8:30 a.m. Introduction – Welcome: Executive Director**

**8:45 a.m. Board Operations/Parole Dockets/Board’s File: Representative**

**9:00 a.m. Training/Historical Overview/Mission-Vision Statement/Workplace Harassment/Code of Ethics Policy: Training Director**

**9:30 a.m. Overview of Board/Parole Hearings: Representative**

**10:00 a.m. Break**



**10:15 a.m. Research, Policy and Planning: Representative**

**10:30 a.m. Community Correction: Community Correction Director**

**10:45 a.m. Information Systems: Information Systems Director**

**11:00 a.m. Fiscal Services: Representative**

**11:15 a.m. Hearing Officers and Hearings Division: Representative**

**11:30 a.m. Field Services/Probation and Parole: Field Director**

**11:45 a.m. Human Resources/Title VI: HR Director**

**12:00 p.m. – 12:30p.m. Closing Remarks: Training Director**

Participants please sign the New Employee Orientation Overview roster Central Office Meet and Greet Tour @ 2:15 p.m. Tour Guide: Training Director

# APPENDIX – J



STATE OF TENNESSEE  
**BOARD OF PROBATION AND PAROLE**  
 Contractor Performance Assessment  
 For Personal Service, Professional Service and Consulting Service Contracts

Instructions: Completion of this form is dictated by the Board of Probation and Parole’s Annual Contract Management Plan. One performance assessment should be completed for each of the agency’s service contracts. For contracts with a duration of less than six months or for a one-time service, the assessment shall be completed after the service has been provided and prior to final payment. Contracts for ongoing services shall be assessed on a semi-annual basis. The assessment should be completed by an employee with first-hand knowledge of the contractor’s performance, reviewed by an employee independent of the program area, and approved by the Executive Director or his designee. Completed assessments shall be forwarded to the BOPP Contract Coordinator.

<i>Contractor Name</i>	<i>Contract Number and Start Date</i>
<i>Semi-annual Assessment Period Covered</i> <b>YES</b>	<i>One-Time Assessment</i> <b>NO</b>
<i>June 10—Dec. 10</i>	

**Contract Scope of Services (Section A)**

<p><i>Has the contractor provided the services and deliverables required under the contract?</i>  <b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>
<p><i>Has the contractor completed the work within the timeframe set out in the contract?</i>  <b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>
<p><i>Have the contract and the contractor’s performance thereunder accomplished the department’s objectives?</i>  <b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>

<p><i>Has the contractor complied with all applicable BOPP policies and State of Tennessee standards in the performance of the contract?</i></p> <p><b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>

**Contract Payment Terms and Conditions (Section C)**

<p><i>Has the contractor submitted invoices, in form and substance acceptable to the State with all the necessary supporting documentation in accordance with the payment methodology (subsection C.3) of the contract?</i></p> <p style="text-align: right;"><b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>
<p><i>Did the contractor complete and sign an ‘Authorization Agreement for Automatic Deposits’ {ACH Credits form} (subsection C)?</i></p> <p style="text-align: right;"><b>Y N</b></p> <p><i>(Explanation required for any No or N/A response)</i></p>

**Contract Standard Terms and Conditions (Section D)**

<p><i>Has the contractor complied with the nondiscrimination provision of the contract? (Subsection D)</i></p> <p style="text-align: right;"><b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>
<p><i>Has the contractor complied with the prohibition of illegal immigrants provision of the contract? (Subsection D)</i></p> <p style="text-align: right;"><b>Y N</b></p> <p><i>(Explanation required for any No response)</i></p>
<p><i>Has the contractor submitted progress reports as requested by the State?</i></p> <p style="text-align: right;"><b>Y N</b></p>

*(Subsection D)*

*(Explanation required for any No response)*

**Contract Special Terms and Conditions (Section E)**

*Has the contractor complied with all special terms and conditions of the contract?*

**Y N**

*(Explanation required for any No response)*

**Does the Agency have any reservations about continuing a contracting relationship with Contractor?**

*Would you recommend exercising any extension option included in Subsection B2 of the contract (if applicable)?* **Y N N/A**

*Would you recommend the Agency contracting with this Contractor in the future?* **Y N N/A**

**Use a separate sheet to describe any other operational issues or concerns relative to the contract.**

<i>Assessment Completed By:</i>	<i>Fiscal Director Approval:</i>
<hr/>	<hr/>
<i>Signature</i> <span style="float: right;"><i>Date</i></span>	<i>Signature</i> <span style="float: right;"><i>Date</i></span>
<hr/>	<i>Executive Director Approval:</i>
<i>Print Name and Title</i>	<hr/>
	<i>Signature</i> <span style="float: right;"><i>Date</i></span>

**APPENDIX K BOPP Contract Listing**

Contract Types	#	Contract Number	Vendor	Start Date	End Date	Maximum Liability	Ownership/Management
<i>Fee for Service</i>							
	1	4469	iSECUREtrac	7/18/2005	6/17/2011	\$4,820,000	Publicly Held corporation
	2	12924	Aegis	10/1/2009	9/30/2012	\$900,000	Corporation
	3	22790	Evelyn Frye Center	7/1/2010	6/30/2012	\$4,000.00	Female Owned
	4	24140	Satellite Tracking of People	12/15/2010	12/14/2011	\$1,380,593.75	Limited Liability Company
	5	26120	Men Stopping Violence	3/1/2011	6/30/2011	\$9,550.00	Non-Profit Managed by White Female
<i>Governmental</i>							
	6	22408	Shelby County	7/1/2010	6/30/2011	\$1,200	Government
	7	NC-08-22562	Department of Labor & Workforce	8/1/2007	6/30/2012	No Cost	Government
	8	N/A	Department of Mental Health (Psychological Evaluations)	1/1/2011	6/30/2011	\$20,000.00	Government
	9	ID-11-31713	Department of Correction	7/1/2010	6/30/2011	\$30,000	Government
	10	ID-10-30059-00	Department of Correction (Victim Impact)	10/26/2009	10/29/2009	\$12,684	Government
	11	ID-11-32663	Department of Mental Health (Indigent Offender)	7/1/2010	6/30/2011	\$4,385,000.00	Government
	12	ID-11-34112-00	Tennessee Foreign Language Institute	12/8/2010	12/7/2011	\$20,000.00	Government
<i>Community Corrections Grantees</i>							
	13	20856	Madison County Community Corrections	7/1/2010	6/30/2013	\$2,167,239.00	Government
	14	20869	Decatur County Community Corrections	7/1/2010	6/30/2013	\$1,475,670.00	Government
	15	20849	John R. Hay House	7/1/2010	6/30/2013	\$2,964,552.00	Government
	16	20876	Upper Cumberland	7/1/2010	6/30/2013	\$1,420,494.00	Quasi-Governmental
	17	20870	First Tennessee HRA	7/1/2010	6/30/2013	\$2,056,494.00	Quasi-Governmental
	18	20873	Hamilton Co. Community Corrections	7/1/2010	6/30/2013	\$962,244.00	Government
	19	20874	Knox Co. Community Corrections	7/1/2010	6/30/2013	\$2,022,438.00	Government
	20	20858	Montgomery/Robertson Co.	7/1/2010	6/30/2013	\$1,364,667.00	Government
	21	20877	Metro Nashville Davidson County	7/1/2010	6/30/2013	\$4,260,336.00	Government
	22	20875	Mid-Cumberland HRA	7/1/2010	6/30/2013	\$3,480,420.00	Quasi-Governmental
	23	20846	Corrections Management Corp	7/1/2010	6/30/2013	\$2,017,635.00	Non-Profit 501 © 3
	24	20854	Southeast TN Community	7/1/2010	6/30/2013	\$979,677.00	Government
	25	20852	South Central HRA	7/1/2010	6/30/2013	\$1,452,489.00	Quasi-Governmental
	26	20855	Southeast TN HRA	7/1/2010	6/30/2013	\$1,042,044.00	Quasi-Governmental
	27	20868	Cocaine Alcohol Awareness Program	7/1/2010	6/30/2013	\$1,671,732.00	Non-Profit 501 © 3 Managed by African-American Male
	28	20841	Westgate Corrections Network	7/1/2010	6/30/2013	\$1,880,061.00	Non-Profit 501 © 3
	29	20847	Project WIT	7/1/2010	6/30/2013	\$1,774,770.00	Non-Profit 501 c 3 Managed by African-American Male
	30	20851	East Tennessee HRA	7/1/2010	6/30/2013	\$4,727,151.00	Quasi-Governmental
	31	20845	Correctional Alternatives Inc.	7/1/2010	6/30/2013	\$2,530,683.00	Non-Profit 501 © 3
<i>Other</i>							
<i>Automated Reporting</i>	32	NC-10-29109	Fieldware	8/10/2009	8/9/2012	No Cost	Limited Liability
<i>Deaf Language Interpretation Delegated Authority</i>	33	22839	N/A	10/1/2010	9/30/2011	\$3,500.00	N/A
<i>Court Reporting Delegated Authority</i>	34	20273	N/A	7/1/2010	6/30/2011	\$10,000.00	N/A
<i>Contract Total</i>						<b>\$51,834,639.75</b>	

