



July 24, 2014

Monica Smith-Ashford, Esq.  
Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Dear Ms. Smith-Ashford:

This letter is in response to the letter sent June 20th concerning the TRA workshop to be held on August 11. TNAIRS and 2-1-1 representatives welcome the opportunity to discuss the proposed rules that were submitted to TRA in 2011. Several 2-1-1 agencies met in July to discuss these rules and wish to share some concerns with TRA.

Although all of the proposed rules are goals our agencies strive to achieve, changes in funding and staffing since 2011 make compliance with all of the rules as stated unrealistic for many 2-1-1 call centers. The main concerns shared in the meeting are:

1. The resources and costs required to become accredited are not feasible for most of the TN 211 agencies in the time frame proposed. For some of the smaller call centers, this may not be possible at all. Many 2-1-1 agencies have had significant funding concerns that make even their current level of service a challenge. Agencies need additional time for self- assessment, implementation of needed changes, and assurance of necessary funding.
2. Number of trained paid and volunteer staff that must be AIRS certified will be problematic for some of the 211 agencies which rely heavily on volunteers
3. How will the rules that are approved by TRA be monitored? Will there be site visits?

The original intent of these rules was to ensure consistency of 2-1-1 service throughout the state, in alignment with the national AIRS standards. The rules must take into consideration size, location, demographics and unique nature of the different areas of the state.

We look forward to meeting with you on August 11<sup>th</sup> to discuss the proposed rules from 2011 in further detail.

Sincerely,

Lisa Lumb  
TNAIRS President