



Legal Issues

Dear Reader:

The following document was created from the MTAS website ([mtas.tennessee.edu](https://www.mtas.tennessee.edu)). This website is maintained daily by MTAS staff and seeks to represent the most current information regarding issues relative to Tennessee municipal government.

We hope this information will be useful to you; reference to it will assist you with many of the questions that will arise in your tenure with municipal government. However, the *Tennessee Code Annotated* and other relevant laws or regulations should always be consulted before any action is taken based upon the contents of this document.

Please feel free to contact us if you have questions or comments regarding this information or any other MTAS website material.

Sincerely,

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Legal Issues

Reference Number: MTAS-462

City governments and all the secondary offices, boards, committees and commissions of a city are creations of the law. They find their origin in either the Tennessee Constitution or statutory law. It is a long-established principle in Tennessee law that municipalities can do only those things that the law authorizes them to do.^[1] Therefore, it is vitally important to any operation of city government to know what the laws are that authorize the city to perform a function and to know what the laws are that place limitations around that authority. There are laws that require cities and all local governments to keep records and laws that govern how a city manages its records. Both of these topics are examined in this section.

[1] *Barnes v. City of Dayton*, 216 Tenn. 400, 392 S.W.2d 813 (1965)

Laws that Require Records to be Kept

Reference Number: MTAS-463

Not every record in a government office has a corresponding statute or regulation requiring that it be kept. Many records are generated simply in the ordinary course of business without any formal legal authority mandating their creation. But creating and preserving certain other records are required by specific laws. Since these laws affecting individual records are referenced in the retention schedules at the end of this manual, this chapter discusses the sources of those laws more generally.

Federal Laws and Regulations

Municipal officials should be aware that federal laws and regulations require them to keep certain records. This is particularly true of payroll information and other employment-related records. Most of the laws regarding how we hire, fire, compensate and treat employees are generated at the federal level. The Family and Medical Leave Act, the Fair Labor Standards Act, and the Occupational Safety and Health Act are just a few of the acts that place certain burdens on employers to keep records regarding their employees. These statutes also generate another layer of federal regulations that govern the implementation and enforcement of the acts. In addition to personnel issues, federal laws and regulations also touch topics as diverse as student records and wastewater management. Laws passed by the U.S. Congress are codified in the United States Code (U.S.C. or U.S.C.A. for United States Code Annotated). The massive amounts of rules and regulations generated by the different federal agencies are found primarily in the Code of Federal Regulations (C.F.R.).

State Laws and Regulations

Since municipal governments are instrumentalities of the state, some of the laws addressing what records must be kept by city offices and how those records should be managed are found in the Tennessee Code Annotated (T.C.A.). As with the federal government, the state of Tennessee also has a set of rules and regulations promulgated by state agencies, boards and commissions, which are published by the secretary of state and known as the Official Compilation — Rules and Regulations of the State of Tennessee.

The duties of many city officials are set forth in Title 8 and in the general law charters in Title 6 of the T.C.A. Other duties and responsibilities are found in private act charters. For many offices, there are requirements included in the duties of the office to keep and preserve specific types of records. Certain city officers and employees, such as the city recorder, human resources manager and court clerk have a major record-keeping function. The proper and efficient performance of these duties is necessary not only for the continued operation of the city government, but also for the preservation of order in our society. Even offices without a primary record-keeping function are required to keep records.

Even though city officials may change with every election, the offices themselves must maintain a level of continuity. To ensure this, the responsibility for keeping and turning over the records of city offices was specifically addressed in the statutes requiring officials to be bonded. Part of what is insured by the bond of an official is the fulfillment of a duty to "... faithfully and safely keep all records required in such

principal's official capacity, and at the expiration of the term, or in the case of resignation or removal from office, ... turn over to the successor all records and property which have come into such principal's hands...."^[1] Failure to do so can result in recovery against the insurance company or sureties on the bond who may, in turn, proceed against the official in his or her individual capacity for subrogation of the claim.

Basic Record-Keeping Statutes

State laws regarding record keeping are found primarily in Title 10, Chapter 7 of the T.C.A. Parts 1 and 2 of that chapter contain a number of statutes governing preserving, transcribing and indexing records, while Part 7 pertains specifically to municipal records and retention schedules.

The State Public Records Commission

Part 3 of Chapter 7 of the T.C.A., Title 10, establishes the State Public Records Commission and designates the Records Management Division of the Department of General Services as the primary records manager for all state government records.^[2] Currently, these entities do not take jurisdiction over local government records, but they can be looked to for examples of proper records management and preservation.

Public Access

The Freedom of Information Act (FOIA)^[3] was passed by Congress in 1966 and amended in 1974. FOIA creates procedures that allow members of the public to obtain the records of federal government agencies.^[4] The Freedom of Information Act does NOT apply to city governments, nor does it apply to state or other local governments. It applies only to certain federal departments and agencies of the United States government. But you should be aware of the FOIA in the event that citizens try to assert their rights to municipal government records under that act. Different policies and procedures apply to offices under the Freedom of Information Act that are not included in the Tennessee public records statutes that apply to your office(s). Under the FOIA, citizens may request a federal agency covered by the act to perform searches of its records to locate certain information and then disclose the information, providing copies to the person making the request (subject to certain fees). As will be seen, Tennessee statutes allow broad access to public records, but they generally do not require local officials to perform searches or create new reports or responses to requests if those reports are not already a part of the office records.

^[1] T.C.A. § 8-19-111.

^[2] See T.C.A. §§ 10-7-301, *et seq.*

^[3] 5 U.S.C.A. 552(a).

^[4] Using the Freedom of Information Act: A Step-by-Step Guide, an American Civil Liberties Union Publication

Tennessee Public Records Statutes

Reference Number: MTAS-464

The Tennessee Public Records Act (hereinafter referred to as "TPRA") is found in Title 10, Chapter 7, Part 5 of the T.C.A. The starting point for a discussion of the law in this area is the declaration found in T.C.A. § 10-7-503 that government records are open to public inspection. It reads as follows:

... All state, county and municipal records shall at all times during business hours ... be open for personal inspection by any citizen of this state, and those in charge of such records shall not refuse such right of inspection to any citizen, unless otherwise provided by state law.^[1]

The TPRA has been construed broadly by both the state attorney general and the Tennessee judiciary.^[2] The legislature made it clear that its intent in passing this law was to "... give the fullest possible public access to public records," and it instructed the courts to exercise whatever remedies are necessary to ensure that purpose is fulfilled.^[3] The courts have ruled that a "presumption of openness"

exists with government documents.^[4] That is not to say, however, that public access is totally without limitation.

Who Has the Right to Access Public Records?

The TPRA provides that records must be open for inspection by any citizen of Tennessee. In keeping with the legislative intent to provide for liberal public access to government records, the Tennessee Supreme Court determined that the word citizen includes convicted felons incarcerated as inmates within the Tennessee prison system.^[5] Although certain rights are stripped from individuals when they are convicted of a felony (e.g., voting, ability to hold public office), the court concluded that neither the Tennessee Public Records Act nor any other statute prevented a convicted felon from seeking access to public records. Neither should access be denied to anyone else who appears to be a citizen of this state.

The TPRA is not as generous with nonresidents, however. Since the language in the statute grants public access to “any citizen of this state,” the Tennessee Attorney General opined that public officials may deny requests for copies of public records based on the lack of state citizenship.^[6] Since there is no fundamental federal right to access of government records and since the TPRA only requires that access be provided to Tennessee citizens, the attorney general reached the conclusion that it is not a violation of the privileges and immunities clause of the United States Constitution to deny access to people from other states who make requests for Tennessee records. Keep in mind that although the TPRA does not affirmatively require disclosure of public records to noncitizens, neither does it prohibit the release of public records to noncitizens.^[7] Governmental entities are required to have properly adopted policies in place that address who can access municipal records. These policies should be enforced consistently and reviewed regularly.

How Should Access Be Provided?

The TPRA states that records shall be open to inspection “during business hours.” Additionally, in all cases where a person has the right to inspect public records, he or she also has the right to copies of those records.^[8] Every effort should be made to provide reasonable accommodation to parties requesting access to records; however, providing this service need not prevent the performance of other duties of the office. A request to see every record of an office and make a photocopy of each of them could bring the entire operation of an office to a halt. For this reason, each governmental entity subject to the Act is required to have a properly adopted policy in place that governs how requestors can access public records and obtain copies or duplicates of the records.^[9] These regulations should be reasonable and not interfere with the intent of the legislature to provide broad public access to records. The official with custody of the record should strive to balance the right of access to records with his or her responsibility to preserve and protect the records. Regulations should be tailored to accommodate requests in a timely manner while allowing for the continued efficient functioning of the office and for the preservation and security of the records. Regulations that are intended to frustrate the ability of a citizen to access records will likely be found unreasonable and be struck down by the courts.

Be aware that there is a danger of theft, vandalism or damage by negligence inherent in allowing a member of the public access to government records. There is a profitable market for certain historical manuscripts. Across the country, government records are disappearing from government offices and reappearing for sale in antiques stores, flea markets and specialty shops. To prevent theft or vandalism, someone from your office should supervise the person accessing the records, or, at a minimum, the person accessing the records should be required to examine them in an open area.

The records custodian must promptly make available any public record not exempt from disclosure. If it is not practicable for the record to be made available promptly, the custodian must within seven business days either (1) make the record available, (2) deny the request in writing including the basis for denial, or (3) furnish the requestor with a completed records request response form developed by the Office of Open Records Counsel stating the time necessary to produce the record or information.

The records custodian may not require that a request to **inspect** public records be made in writing, but the custodian may require a request for a copy of a public record to be in writing or on a form provided by the Office of Open Records Counsel in the comptroller’s office. The custodian also may require a photo identification of the requestor or other form of identification suitable to the custodian to establish Tennessee residency.

The records custodian may require the requestor to pay the reasonable costs, including certain labor costs of producing and copying public records. The Office of Open Records Counsel has established a recommended schedule of fees for this purpose.

Office of Open Records Counsel

The General Assembly established the Office of Open Records Counsel in the Office of the Comptroller of the Treasury to answer questions and provide information to the public about public records. The Office provides informal opinions, creates forms for records requests and responses, establishes a suggested fee schedule, and mediates disputes about records. Information created by this office is available on its website at <https://www.comptroller.tn.gov/openrecords/> [1].

Denial of Access — Liability

Any citizen of Tennessee who is denied the right to personal inspection of a public record in whole or in part is entitled to petition the court to review the actions that were taken to deny access to the record.^[10] Petitions may be filed in the chancery court or circuit court for the county where the records are located or in any other court exercising equity jurisdiction in the county.^[11] Upon the filing of the petition, the court shall, at the request of the petitioning party, issue an order requiring the defendant to appear and show cause why the petitioner should not be granted access to the record. No formal written response to the petition is required. The burden of proof rests on the person having custody of the records to show why public access should not be allowed.^[12]

If the court determines that the petitioner has a right to inspect the records, the records must be made available unless the defendant timely files for appeal or the court certifies a question with respect to disclosure of the records to an appellate court.^[13] If a public official is required to disclose records pursuant to these procedures, he or she cannot be held civilly or criminally liable under state law for any damages caused by the release of the information.^[14] If the court determines that the government entity knowingly and willfully refused to disclose a public record, it may, at the discretion of the judge, assess all reasonable costs involved on obtaining the record, including attorney's fees, against the governmental entity.^[15] In determining whether denial of access was willful, the court may consider any guidance provided to the records custodian by the Office of Open Records Counsel.

[1] T.C.A. § 10-7-503.

[2] See generally, *Memphis Publishing Co. v. Holt*, 710 S.W. 2d 513 (Tenn. 1986).

[3] T.C.A. § 10-7-505(d).

[4] *Griffin v. City of Knoxville*, 821 S.W. 2d 921, 924 (Tenn. 1991).

[5] *Cole v. Campbell*, 968 S.W. 2d 274 (Tenn. 1998).

[6] Op. Tenn. Atty Gen. No. 99-067 (March 18, 1999).

[7] Op. Tenn. Atty Gen. No. 99-067 (March 18, 1999).

[8] T.C.A. § 10-7-506(a).

[9] T.C.A. § 10-7-503(g).

[10] T.C.A. § 10-7-505(a).

[11] T.C.A. § 10-7-505(b).

[12] T.C.A. § 10-7-505(c).

[13] T.C.A. § 10-7-505(e).

[14] T.C.A. § 10-7-505(f).

[15] T.C.A. § 10-7-505(g).

Which Records are Subject to Public Access?

Reference Number: MTAS-465

The legislature intended the fullest possible public access to public records. But what are public records? Generally speaking, the courts have ruled that “[i]n those instances where documents have been made or received in connection with the transaction of official business by any governmental agency, then a presumption of openness exists, and the documents are public records within the meaning of T.C.A. § 10-7-503.”^[1] However, this presumption of openness is overcome wherever State law provides that a record is confidential.

T.C.A. § 10-7-503 itself includes some restrictions on the public’s access to certain records. This section makes contingency plans of law enforcement agencies to deal with bomb threats, terrorist acts, and other acts of violence confidential and not open to public inspection. It also requires that certain information relative to law enforcement officers that is made confidential be redacted before the record is inspected. It also requires notice to a police officer within three days after the officer’s personnel information has been inspected.

Confidential Records

Another statute in the Tennessee Public Records Act provides a long list of government records that must be kept confidential.^[2] This statute is amended and added to regularly by the Tennessee General Assembly. The following list reflects many of the records designated as confidential by T.C.A. § 10-7-504:

- Medical records of patients in state, county, and municipal hospitals and medical facilities;
- Any records concerning the source of body parts for transplantation or any information concerning persons donating body parts;
- All investigative records of the Tennessee Bureau of Investigation (TBI), all criminal investigative files of the Motor Vehicle Enforcement Division of the Department of Safety relating to stolen vehicles or parts, all files of the Driver’s License Issuance Division and the Handgun Carry Permit Division of the Department of Safety relating to bogus driver’s licenses and handgun carry permits issued to undercover law enforcement agents;
- Records, documents and papers in the possession of the Military Department that involve national or state security;
- Records of students in public educational institutions;
- Certain books, records, and other materials in the possession of the office of the attorney general relating to any pending or contemplated legal or administrative proceeding;
- State agency records containing opinions of value of real and personal property intended to be acquired for a public purpose;
- Proposals received by the state pursuant to personal service, professional service and consultant service contract regulations, and related records before the state has finished its complete evaluation;
- Investigative records and reports of the Internal Affairs Division of the Department of Correction or the Department of Children’s Services;
- Official health certificates, collected and maintained by the state veterinarian;
- Capital plans, marketing information, proprietary information and trade secrets submitted to the Tennessee Venture Capital Network; Records of historical research value that are given or sold to public archival institutions, public libraries, or libraries of a unit of the board of regents or the University of Tennessee, when the owner or donor requires that the records are kept confidential;
- Records of historical research value that are given or sold to public archival institutions, public libraries, or libraries of a unit of the board of regents or the University of Tennessee, when the owner or donor requires that the records are kept confidential;
- Personal information contained in motor vehicle records;

- All memoranda, work notes or products, case files, and communications related to mental health intervention techniques conducted by professionals in a group setting to provide job-related critical incident counseling and therapy to law enforcement officers, correction officers, dispatchers, EMTs, paramedics and firefighters;
- All riot, escape, and emergency transport plans incorporated in a policy and procedures manual of county jails and workhouses or prisons operated by the Department of Correction or under private contract;
- Records of any employee's identity, diagnosis, treatment, or referral for treatment by a state or local government employee assistance program;
- Unpublished telephone numbers in the possession of emergency communications districts;
- Employment records of state, county, municipal, or other public employees that contain cell phone numbers, home telephone numbers, addresses, bank account information, Social Security numbers, or driver's license information (except where driving or operating a vehicle is part of the employee's job duties) of the employee or an immediate family or household member. [NOTE: Under the law, this information in employment records should be redacted whenever possible and not be used to limit or deny access to otherwise public information.];
- Certain personnel information of undercover police officers and their immediate family or household members;
- Identifying information, such as unlisted telephone numbers, in the possession of a private or public utility service provider that could be used to locate an individual, when the utility has been provided with a copy of a valid protection document and confidentiality has been requested;
- Those parts of a record identifying an individual as a person who has been or may in the future be directly involved in the process of executing a sentence of death;
- Credit card numbers, Social Security numbers, account numbers, security codes and other identifying information in the hands of a utility;
- Records of a utility that would identify areas of vulnerability or allow disruption of utility service,^[3] and
- Certain personal information relative to law enforcement officers, in addition to that made confidential otherwise, when the information is requested for a professional, business or official purpose, and the chief determines there is a reason not to disclose the information.
- Video taken by a law enforcement body camera that depicts minors, when taken within a school that serves any grades from kindergarten through grade twelve (K-12); the interior of a facility licensed under title 33 (mental health) or title 68 (health); or the interior of a private residence that is not being investigated as a crime scene.
- Examination questions, answer sheets, scoring keys, and other examination data used for the purpose of licensure, certification, or registration of health professionals under title 63 or title 68, however, a person who has taken such an examination has the right to review the person's own completed examination; and final examination scores of persons licensed, certified, or registered as health professionals under title 63 or title 68 shall be open for inspection by members of the public, upon request.

This list of confidential records found in T.C.A. § 10-7-504 is not exclusive, however, and many other statutes, rules, and the common law dealing with specific subjects can also make a specific record confidential. ^[4] The following is a non-exhaustive list of statutes that designate certain records as confidential:

- All memoranda, work products or notes, and case files of victim-offender mediation centers (T.C.A. § 16-20-103);
- Adoption records and related records (T.C.A. §§ 36-1-102 *et seq.*);
- Certain information divulged in paternity proceedings that might be used to locate a victim or an alleged victim of domestic violence (T.C.A. § 36-2-311(e));
- Many records regarding juveniles, children and minors (T.C.A. §§ 37-1-153, 37-1-154, 37-1-155, 37-1-409, 37-1-612, 37-1-615, 37-2-408, 10-7-504);

- Certain records regarding the granting of consent to abortion for a minor and other records regarding abortion (T.C.A. §§ 37-10-304, 39-15-201);
- Certain student information (See Title 49 of the Tennessee Code);
- Whistle-blowing reports of violations of the Education Truth in Reporting Act (T.C.A. § 49-50-1408);
- Certain records of an employer's drug testing program (T.C.A. § 50-9-109. See Op. Tenn. Atty Gen. 99-126);
- Tax returns, audits, letter rulings and other taxpayer identifying information (T.C.A. § 67-1-1702);
- Business tax statements, reports, audits and returns (T.C.A. § 67-4-722);
- Information or records held by a local health department regarding sexually transmitted diseases (T.C.A. § 68-10-113);
- Patient medical records of hospitals and local or regional health departments (T.C.A. § 68-11-305); and
- Nursing home patient records (T.C.A. § 68-11-804).

Note that this list highlights only some of the other provisions of the Tennessee Code that make records confidential. The Tennessee Court of Appeals held that municipal attorney work product is confidential.^[5] Additionally, the Tennessee Supreme Court ruled that sources of legal authority other than statutes may make a record confidential. For example, the Tennessee Supreme Court ruled that the Tennessee Rules of Criminal Procedure and Civil Procedure may also designate certain records as confidential.^[6] The Tennessee Supreme Court also ruled, however, that the common-law law enforcement privilege, which would make certain investigative information gathered by police departments confidential, does not apply in Tennessee.^[7] If you have a question regarding the confidentiality of a specific record not listed above, contact your city attorney or MTAS management consultant.

Maintaining Confidentiality

Any record that is designated as confidential must be treated as confidential by the agency with custody of the record throughout the maintenance, storage and disposition of the record. This includes destroying the record (if it is eligible for destruction) in such a manner that the record cannot be read, interpreted or reconstructed.^[8] Once a confidential record has been in existence for more than 70 years, it shall be open for public inspection by any person unless disclosure of the record is specifically prohibited or restricted by federal law or unless the record is a record of services for mental illness or retardation. This "70-year rule" does not apply to adoption records, records maintained by the office of vital records, and records of the TBI that are confidential.^[9]

Breach of Confidential Personal Information

T.C.A. § 47-18-2901 requires municipalities to create safeguards to ensure the security of personal information on laptop computers. Failure to comply with this requirement creates a cause of action against the municipality if identity theft results.

T.C.A. § 47-18-2107 requires any holder of computerized personal information that is confidential to disclose any breach of the security of the system to any resident of Tennessee whose unencrypted personal information was, or is reasonably believed to have been, acquired by an unauthorized person. If the information holder does not own the personal data, the holder must also notify the owner or licensee of the breach within 45-days following the discovery, unless a longer period of time is required due to the legitimate needs of law enforcement. The code section establishes procedures for giving the notices.

Valid Protection Documents

In addition to this large group of records made strictly confidential by state laws, T.C.A. § 10-7-504 allows persons who have obtained a "valid protection document" to request certain information that could be used to locate them be kept confidential. Protection documents are defined by the act and include orders of protection and affidavits of directors of rape crisis centers or domestic violence shelters. If the individual desiring confidentiality presents one of these documents to the records custodian for the governmental entity and requests confidentiality, the custodian of the records may

choose to comply with the request or reject it. If the request is rejected, the custodian must state the reason for denying the request. If the request is granted, the records custodian must place a copy of the protection document in a separate confidential file with any other similar requests, indexed alphabetically by the names of the persons requesting confidentiality. From that point on, until the custodian is notified otherwise, any time someone requests to see records of the office, the records custodian must consult the file and ensure that any identifying information about anyone covered by a protection document filed with the office is kept confidential before allowing any record to be open for public inspection. "Identifying information" includes any record of home and work addresses, telephone numbers, Social Security number, and "any other information" regarding the person that could reasonably be used to locate an individual. That information must be redacted from the records of the office before anyone can be allowed to inspect the records of the office. Cities and towns are not required to comply with these requests to maintain the identifying information described above as confidential. However, utility service providers are required to comply with such requests.

Student Records

Access to student records is governed by state and federal laws.^[10] The main purpose of these laws is to protect the confidentiality of these records. If your city has a municipal school system and you would like detailed information about the legal requirements affecting student records, contact your MTAS management consultant.

E-mail and Other Documents — Discovery

The Federal Rules of Civil Procedure^[11] specifically require employees to retain electronic communications, including e-mail, that is discoverable in litigation. These rules require employees to meet and confer with plaintiffs in employment litigation within 90 days after the appearance of the defendant or 120 days after a complaint has been issued. At that point, each party must disclose a copy or description of all documents, electronically stored information, and tangible things in its possession that it may use to support its claims or defenses. Therefore, these records not only must be retained, but must be categorized and may be deleted or removed based upon routine operation of a computer system or under an adopted records retention policy. Records custodians should check with their information technology departments to make sure the municipality has the technical ability to comply with the 90- and 120-day rules mentioned above.

Identity Theft Precautions

The federal Fair and Accurate Credit Transactions Act of 2003 (FACTA) — Public Law 108-159 — requires utilities and other municipal departments that defer payments for services to take precautions to protect personal identifying information in their records. The municipality must have a policy that protects personally identifying financial and medical information and provide training on the policy.

[1] *Griffin v. City of Knoxville*, 821 S.W. 2d 921, 924 (Tenn. 1991) as quoted in Op. Tenn. Atty Gen. No. 99-011 (January 25, 1999).

[2] T.C.A. § 10-7-504 .

[3] T.C.A. § 10-7-504.

[4] Op. Tenn. Atty Gen. No. 99-022 (Feb. 9, 1999).

[5] *Arnold v. City of Chattanooga*, 19 S.W. 3rd 779 (Tenn. App. 1999).

[6] See *Appman v. Worthington*, 746 S.W. 2d 165, 166 (Tenn. 1987) and *Ballard v. Herzke*, 924 S.W. 2d 652, 662 (Tenn. 1996).

[7] *Schneider v. City of Jackson*, 226 S.W. 3d 332 (Tenn. 2007).

[8] T.C.A. § 10-7-504(b).

[9] T.C.A. § 10-7-504(c).

[10] T.C.A. § 10-7-504 and 20 U.S.C. §§1232 *et seq.*

[11] See particularly Federal Rules of Civil Procedure, nos. 26, 34 and 37.

Links:

[1] <https://www.comptroller.tn.gov/openrecords>

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