

Tennessee Housing Development Agency (THDA)

**Equal Employment Opportunity/
Affirmative Action Plan**

Fiscal Year 2020 - 2021

**Central Office Location:
502 Deaderick Street
3rd Floor
Nashville, TN 37243
615-815-2200**



Ralph M. Perrey, Executive Director

Laura Swanson, Title VI Coordinator

Meg Palmer, Affirmative Action Plan Coordinator

**THDA's Equal Employment Opportunity/
Affirmative Action Plan
Fiscal Year 2020 – 2021**

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Governor's Executive Order 3, January 24, 2019

Organizational Profile

Our Mission:

Leading Tennessee Home by creating safe, sound, affordable housing opportunities.

Our History:

The Tennessee Housing Development Agency (THDA) is a State agency that was established by the Tennessee General Assembly in 1973 (TCA 13-23-120): "In order to promote the production of more affordable new housing units for very low, low and moderate income individuals and families in the state, to promote the preservation and rehabilitation of existing housing units for such persons, and to bring greater stability to the residential construction industry and related industries so as to assure a steady flow of production of new housing units..."

Our Goals:

Identified as one of the basic human needs, housing has profound impacts, both social and economic, on individuals and communities. Safe, sound, affordable housing is essential to a healthy household, educational achievement, successful employment, and the stability and safety of the neighborhood. Both housing rehabilitation and the construction of new homes generate jobs and income in the community and produce additional tax revenue.

From this understanding Tennessee Housing Development Agency was instituted in 1973. A fresh review in 2006 developed a new vision: Every Tennessean lives in a safe, sound and affordable home in a viable community. THDA has a broad portfolio of housing assistance programs and is vigorously developing a network of industry and municipal partners for their delivery. Customer Service is more than a watchword, it is a daily effort.

Our Staff:

THDA operates a central office in Nashville, Tennessee, where 88.6% of the staff work from a single location. We have four (4) field offices across Tennessee. These field offices, ranging in size from four (4) employees to nine (9) employees, are solely focused on administration of the Housing Choice Vouchers and related programs: Federal programs through the Department of Housing and Urban Development that provide rent subsidies for low income Tennesseans. As of June 30, 2020 we had a total of twenty-six (26) field-office-based staff. Additionally, we have nine employees who work in the field from home-based offices, five in East TN and four in West TN.

Our Policy and Commitment

THDA is firmly committed to the principle of fair and equal employment opportunities and strives to protect the rights and opportunities of all people to seek, obtain, and hold employment without being subjected to illegal discrimination, harassment, and retaliation in the workplace. It is THDA's policy to provide an environment free of discrimination, retaliation, or harassment of an individual because of that person's race, color, national origin, sex, pregnancy, age (40 and over), religion, creed, disability, veteran's status, genetic information or any other category protected by

state and/or federal laws in the admission or access to, or treatment or employment in its programs, services or activities.

We continue to work towards maintaining and enhancing our diverse workforce. We continue to create a culture that lets diversity grow, allowing us to better serve citizens of the State of Tennessee and other key stakeholders while attracting great employees who value diversity.

Designation of Responsibilities

For effective administration and positive implementation of the Equal Employment Opportunity (EEO) Program and the Affirmative Action Plan (AAP), there shall be involvement, commitment and support of executives, managers, supervisors and employees at all levels.

Ralph M. Perrey, Executive Director of THDA, has general oversight of our Equal Employment Opportunity/Affirmative Action Plan and programs, and overall responsibility for implementation of the THDA EEO program and AAP. The Executive Director is responsible for ensuring that management supports and promotes high visibility of affirmative action initiatives and the total integration of EEO concepts into all facets of personnel and program management. If there are any allegations of illegal discrimination, harassment, or retaliation under Federal or State laws involving internal THDA staff, the Executive Director designates the investigator or investigative team to handle the investigation.

Laura Swanson, Civil Rights Training and Compliance Strategy Advisor, serves as our Title VI Coordinator. Title VI of the Civil Rights Act of 1964 prohibits exclusion from participation in, denial of benefits of, and discrimination under federally assisted programs on grounds of race, color or national origin. The intent of the law is to ensure that all persons, regardless of race, color or national origin, are afforded the opportunity to participate in federally funded programs.

Gathelyn Oliver, Director of Internal Audit, and her Internal Audit staff have responsibility to conduct Title VI investigations. They may conduct other investigations related to discrimination, harassment, and/or retaliation if so designated by the Executive Director.

Cathy Salazar, Director of Human Resources, and the THDA Human Resources staff have responsibility for coordinating outreach recruitment efforts for qualified protected class candidates; monitoring hiring/promotions/demotions/transfers/terminations; ensuring employees are not disciplined in a discriminatory manner; providing career counseling and guidance for employees; assisting executives, managers and supervisors in arriving at solutions to problems; and coordinating employee-related diversity initiatives and activities, including diversity training. Additionally, any job applicant or employee with a disability who needs an accommodation in order to perform the essential functions of his/her job will make an accommodation request to the Director of Human Resources or her designee, as explained in THDA's Americans With Disabilities Act (ADA) policy.

Meg Palmer, Sr. HR Coordinator, has been assigned overall responsibility for development, implementation, dissemination and monitoring of our AAP and is responsible for reporting activities and progress to THDA's Executive Director.

Each executive, manager and supervisor will be held accountable for implementing the Equal Employment Opportunity and Affirmative Action policies and goals, particularly as they relate to

his/her area of responsibility. Executives, managers and supervisors will assist in the identification of problem areas and resolution of these problems as appropriate.

Policy Dissemination

Copies of the Equal Employment Opportunity/Affirmative Action Plan will be forwarded to the Executive Director and the Director of Human Resources annually.

The AAP will be available for review by any employee or other individual upon request to the Executive Director or the Director of Human Resources. Additionally, the plan will be posted on THDA's intranet and internet sites. Agency staff will be advised of their EEO/AA responsibilities through staff meetings and training. EEO/AA policies will be discussed with newly hired employees during their initial orientations to THDA.

Equal Employment Opportunity/Affirmative Action policy statements will be displayed in all THDA facilities, in accordance with State and Federal law.

Each member of THDA's Board of Directors will be given a copy of the updated AAP annually.

Advertisements and position announcements will bear the following statement regarding EEO/AA: "THDA is an equal opportunity, equal access, affirmative action employer."

Internal Auditing and Reporting System

THDA's auditing and reporting system is designed to:

- Determine the current composition of our workforce;
- Document human resources activities;
- Identify problem areas where remedial action is needed;
- Determine the degree to which THDA's AAP goals and objectives have been met;
- Measure the effectiveness of the EEO/AAP program.

The following human resources activities are reviewed on an on-going basis to ensure nondiscrimination and equal employment opportunity for all individuals without regard to race, color, national origin, sex, pregnancy, age (40 and over), religion, creed, disability, veteran's status, genetic information or any other category protected by state and/or federal laws:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, transfer, demotion, upgrading, downgrading, separation;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions;
- Work schedules, flextime, telecommuting, leave usage, leaves of absence;
- Training, attendance at professional meetings and conferences, workshops, seminars;
- Any other term, condition, or privilege of employment.

The following documents are maintained as components of THDA's AAP internal audit process:

- Applicant flow logs showing pertinent information and actions taken for all individuals applying for job opportunities;
- Statistical data of job offers and hires, promotions, resignations, terminations, and layoffs;
- Other data deemed useful in analyzing THDA's diversity and AAP.

The following reporting procedures are in place:

- Annual update of the AAP and dissemination to the Executive Director, Board of Directors, Director of Human Resources, and others as outlined above.
- Additional reports throughout the year as deemed appropriate.

Training and Recruiting

Every employee of THDA will attend a Respectful Workplace training session. Newly hired employees will be scheduled for this training as part of the orientation and on-boarding process. Managers are required to attend a Respectful Workplace for Managers training session.

THDA will provide its employees learning and development opportunities to enhance their promotional qualifications. Employees will be notified of learning and training opportunities on a routine basis, and are encouraged to self-identify opportunities, then request participation through their managers. Selection for participation in these opportunities will be made in an objective and non-discriminatory way.

THDA will continue to announce position vacancies on the Agency's external website (www.thda.org) and by posting on its intranet. Depending on the position, some openings will be advertised internally only, offering current employees the opportunity to move into new roles. The rest will be advertised both internally and externally.

Statistical Review and Analysis – Narrative

As of June 30, 2020 THDA had a total of 260 employees. Of these, 225 worked out of our main office in downtown Nashville, Tennessee. The others worked in the field as follows:

- East Tennessee Field Office (Cookeville) – 4
- Middle Tennessee Field Office (Madison) – 6
- South Central Tennessee Field Office (Lewisburg) - 7
- West Tennessee Field Office (Jackson) - 9
- East TN Home Based – 5
- West TN Home Based - 4

Our total employee make-up included 151 white employees (58.1%), 93 African American employees (35.8%), 7 Hispanic employees (2.7%). We also had 9 employees (3.5%) identify as "Other." We had 189 females (72.7%) and 71 males (27.3%).

Overall, as compared to Tennessee's labor force as a whole, THDA staff characteristics in the areas of female utilization and African American utilization show strong representation in our workforce. Challenges lie in utilization of other minority groups (Hispanic/Latino, Asian/Pacific Islander, and Other).

Our field units show under-utilization in several areas. Field unit analyses are difficult due to the small staff sizes (minimum of 4 and maximum of 9) and geographical locations for three of our units in areas of the state with limited diversity.

Due to new Federal requirements, we have begun tracking statistics related to qualified Veterans and qualified Individuals With Disabilities. The Federal government has set utilization goals for qualified Veterans at 7.2% of the total workforce and of each job group, and goals for Individuals With Disabilities at 7% of the workforce in aggregate and in each job group. Since we had not previously tracked this information, we began by asking our current staff to voluntarily self identify, using forms modeled on sample forms by the Federal Department of Labor. An analysis of the results shows:

- Overall agency figures for Individuals with Disabilities shows an under-utilization in all areas.
- Overall agency figures for qualified Veterans shows an under-utilization in all areas.

Detailed statistical information can be found in the charts included later in this document, including comparisons of our labor force to the general Tennessee labor force, as reported by the Tennessee Department of Labor and Workforce Development.

Identification of Problem Areas

A. Applicant Flow Information

THDA is currently in the process of undergoing an analysis and reconfiguration to our automated system and hope to have this completed by the end of 2021. Although applicant flow information can be derived from the records, this information is not easily obtained for analysis related to affirmative action reviews. Once the reconfiguration and analysis are complete, we should be able to obtain this information, going forward.

B. Affirmative Outreach to Veterans and individuals with Disabilities

A review of THDA's current staffing patterns in relation to Federal Department of Labor utilization goal shows below average representation of Veterans and Disabled by THDA's overall workforce. There is room for improvement in representation from Veterans and individuals with disabilities.

Action-oriented Goals

Goal 1: To reconfigure our current applicant tracking system to better meet our needs from a data tracking perspective.

THDA Human Resources staff is working with Taleo concerning the capabilities of the system and are in the process of exploring and utilizing additional components that will assist us in our EEO/AAP efforts. We are working to change our application in such a way that it will help in gathering this information and will make it easier for candidates to apply for positions for which they are qualified.

Goal 2: Attract more qualified candidates in the area of Veterans and individuals with disabilities

We are continuing to find new recruitment resources and sites that touch these populations. These can be used for affirmatively reaching out to minority and veteran populations and people with disabilities.

THDA EEO/AA Statistics June 30, 2020

EEO Category - Agency Wide	White	Black/ African American	Hispanic/ Latino	Asian/ Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	6	1	0	0	0	0	1	4	3	7
2 - First/Mid-Level Officials/Mgrs.	31	13	1	0	0	1	0	30	15	45
3 - Professionals	77	44	2	0	3	4	1	83	43	126
4 - Office/Admin. Support	37	35	4	0	6	2	6	72	10	82
TOTALS	151	93	7	0	9	7	8	189	71	260
1 - Executives/Sr. Officials/Mgrs.	85.7%	14.3%	0.0%		0.0%	0.0%	14.3%	57.1%	42.9%	100.0%
2 - First/Mid-Level Officials/Mgrs.	68.9%	28.9%	2.2%		0.0%	2.2%	0.0%	66.7%	33.3%	100.0%
3 - Professionals	61.1%	34.9%	1.6%		2.4%	3.2%	0.8%	65.9%	34.1%	100.0%
4 - Office/Admin. Support	45.1%	42.7%	4.9%		7.3%	2.4%	7.3%	87.8%	12.2%	100.0%
TOTALS	58.1%	35.8%	2.7%		3.5%	2.7%	3.1%	72.7%	27.3%	100.0%

EEO Category - Central Office	White	Black/ African American	Hispanic/ Latino	Asian/ Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	6	1	0	0	0	0	1	4	3	7
2 - First/Mid-Level Officials/Mgrs.	28	12	1	0	0	1	0	26	15	41
3 - Professionals	77	41	2	0	3	4	1	80	43	123
4 - Office/Admin. Support	28	25	4	0	6	2	6	55	8	63
TOTALS	139	79	7	0	9	7	8	165	69	234
1 - Executives/Sr. Officials/Mgrs.	85.7%	14.3%	0.0%		0.0%	0.0%	33.3%	57.1%	42.9%	100.0%
2 - First/Mid-Level Officials/Mgrs.	68.3%	29.3%	2.4%		0.0%	2.4%	0.0%	63.4%	36.6%	100.0%
3 - Professionals	62.6%	33.3%	1.6%		2.4%	3.3%	2.3%	65.0%	35.0%	100.0%
4 - Office/Admin. Support	44.4%	39.7%	6.3%		9.5%	3.2%	75.0%	87.3%	12.7%	100.0%
TOTALS	59.4%	33.8%	3.0%		3.8%	3.0%	3.4%	70.5%	29.5%	100.0%

EEO Category - East Tennessee Field Office (Cookeville)	White	Black/ African American	Hispanic/ Latino	Asian/ Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	0	0	0	0	0	0	0	0	0	0
2 - First/Mid-Level Officials/Mgrs.	1	0	0	0	0	0	0	1	0	1
3 - Professionals	0	0	0	0	0	0	0	0	0	0
4 - Office/Admin. Support	3	0	0	0	0	0	0	3	0	3
TOTALS	4	0	0	0	0	0	0	4	0	4
1 - Executives/Sr. Officials/Mgrs.										
2 - First/Mid-Level Officials/Mgrs.	100.0%							100.0%		100.0%
3 - Professionals										
4 - Office/Admin. Support	100.0%							100.0%		100.0%
TOTALS	100.0%							100.0%		100.0%

EEO Category - West Tennessee Field Office (Jackson)	White	Black/ African American	Hispanic/ Latino	Asian/ Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	0	0	0	0	0	0	0	0	0	0
2 - First/Mid-Level Officials/Mgrs.	1	0	0	0	0	0	0	1	0	1
3 - Professionals	0	1	0	0	0	0	0	1	0	1
4 - Office/Admin. Support	0	7	0	0	0	0	0	7	0	7
TOTALS	1	8	0	0	0	0	0	9	0	9
1 - Executives/Sr. Officials/Mgrs.										
2 - First/Mid-Level Officials/Mgrs.	100.0%							100.0%		100.0%
3 - Professionals		100.0%						100.0%		100.0%
4 - Office/Admin. Support		100.0%						100.0%		100.0%
TOTALS	11.1%	88.9%						100.0%		100.0%

EEO Category - South Central Tennessee Field Office (Lewisburg)	White	Black/ African American	Hispanic/ Latino	Asian/ Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	0	0	0	0	0	0	0	0	0	0
2 - First/Mid-Level Officials/Mgrs.	1	0	0	0	0	0	0	1	0	1
3 - Professionals	0	1	0	0	0	0	0	1	0	1
4 - Office/Admin. Support	4	1	0	0	0	0	0	4	1	5
TOTALS	5	2	0	0	0	0	0	6	1	7
1 - Executives/Sr. Officials/Mgrs.										
2 - First/Mid-Level Officials/Mgrs.	100.0%							100.0%		100.0%

3 - Professionals	0.0%	100.0%						100.0%		100.0%
4 - Office/Admin. Support	80.0%	20.0%						80.0%	20.0%	100.0%
TOTALS	71.4%	28.6%						85.7%	14.3%	100.0%

EEO Category - Middle Tennessee Field Office (Madison)	White	Black/African American	Hispanic/Latino	Asian/Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	0	0	0	0	0	0	0	0	0	0
2 - First/Mid-Level Officials/Mgrs.	0	1	0	0	0	0	0	1	0	1
3 - Professionals	0	1	0	0	0	0	0	1	0	1
4 - Office/Admin. Support	2	2	0	0	0	0	0	3	1	4
TOTALS	2	4	0	0	0	0	0	5	1	6
1 - Executives/Sr. Officials/Mgrs.										
2 - First/Mid-Level Officials/Mgrs.		100.0%						100.0%		100.0%
3 - Professionals		100.0%						100.0%		100.0%
4 - Office/Admin. Support	50.0%	50.0%						75.0%	25.0%	100.0%
TOTALS	33.3%	66.7%						83.3%	16.7%	100.0%

NOTE: Madison is in the Nashville MSA. Combined statistics are below.

EEO Category - Central Office & Middle TN Field Office Combined Statistics	White	Black/African American	Hispanic/Latino	Asian/Pacific Islander	Other	Disability	Veteran	Female	Male	TOTALS
1 - Executives/Sr. Officials/Mgrs.	6	1	0	0	0	0	1	4	3	7
2 - First/Mid-Level Officials/Mgrs.	28	13	1	0	0	1	0	27	15	42
3 - Professionals	77	42	2	0	3	4	1	81	43	124
4 - Office/Admin. Support	30	27	4	0	6	2	0	58	9	67
TOTALS	141	83	7	0	9	7	2	170	70	240
1 - Executives/Sr. Officials/Mgrs.	85.7%	14.3%	0.0%		0.0%	0.0%	14.3%	57.1%	42.9%	100.0%
2 - First/Mid-Level Officials/Mgrs.	66.7%	31.0%	2.4%		0.0%	2.4%	0.0%	64.3%	35.7%	100.0%
3 - Professionals	62.1%	33.9%	1.6%		2.4%	3.2%	0.8%	65.3%	34.7%	100.0%
4 - Office/Admin. Support	44.8%	40.3%	6.0%		9.0%	3.0%	0.0%	86.6%	13.4%	100.0%
TOTALS	58.8%	34.6%	2.9%		3.8%	2.9%	0.8%	70.8%	29.2%	100.0%



STATE OF TENNESSEE
EXECUTIVE ORDER
BY THE GOVERNOR

No. 3

AN ORDER MANDATING OPENNESS, TRANSPARENCY, AND ACCOUNTABILITY

WHEREAS, this Administration recognizes, understands, and appreciates the right of its citizens to be informed, to have access to government and to governmental records, and to have the proper checks and balances in place to assure government's accountability to its citizens; and

WHEREAS, this Administration intends to set a high standard for openness, transparency, and accountability; and

WHEREAS, this Administration further recognizes that the character of those holding governmental positions is the cornerstone on which the effectiveness of those policies is based; and

WHEREAS, this superseding Executive Order No. 3 underscores the commitment of this Administration to the values of open and accountable government.

NOW THEREFORE, I, Bill Lee, Governor of the State of Tennessee, by virtue of the power vested in me by the Tennessee Constitution and the laws of the State of Tennessee, do hereby declare that it is the unwavering policy of the Executive Branch to facilitate the right of Tennesseans to know and have access to information with which they may hold state government accountable.

Accordingly, I direct the Chief of Staff and Counsel to the Governor, with assistance from the commissioner of each Executive Branch department, to arrange for training for all members of my Cabinet and employees of the Executive Branch departments regarding the statutory and other legal requirements related to open meetings, open records, applicable ethics and disclosure requirements, and all other matters related to and affecting these issues. Such training is directed to occur within 120 days of this Order and to recur with reasonable frequency to promote this overriding policy of openness, transparency, and accountability. In particular, I direct the commissioner of each Executive Branch department and the other members of my Cabinet to take

steps in their respective areas of responsibility that are necessary not only to comply with applicable legal requirements related to openness, transparency, and accountability, but also to foster a prevailing mindset of inclusiveness in governmental processes and a recurrent pattern of explaining the bases for Executive Branch decisions at appropriate times.

This Executive Order is intended only to improve the internal management of the Executive Branch of the State of Tennessee and does not create any right to administrative or judicial review, or any other right or benefit, substantive or procedural, enforceable at law or equity by a party against the State of Tennessee, its agencies or instrumentalities, its officers or employees, or any other person.

This Executive Order No. 3 supersedes and rescinds Governor Haslam's Executive Order No. 2, dated January 15, 2011, and all other directives and memoranda concerning the same subject. All previous executive orders, the terms of which are inconsistent with the terms of this Executive Order No. 3, are hereby repealed.

IN WITNESS WHEREOF, I have subscribed my signature and caused the Great Seal of the State of Tennessee to be affixed this 24th day of January, 2019.


GOVERNOR

ATTEST:


SECRETARY OF STATE

