



Tennessee Housing Development Agency
Sub-recipient/Grantee Non-Discrimination in Services
Self-Survey Monitoring Form

Background & Instructions

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving Federal financial assistance. Section 504 of the Rehabilitation Act of 1973 provides that that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Title VIII (the “Fair Housing Act”) of the Civil Rights Act of 1968 and amendments, along with the Tennessee Human Rights Act (TCA 4-21-601), prohibit discrimination in housing activities on the basis of race, color, religion, national origin, handicap (disability), sex, and familial status. All THDA contracts with sub-recipients include a non-discrimination assurance that requires the grantee not to exclude persons from participation in, deny benefits to, or otherwise subject any person to discrimination on the grounds of race, color, religion, sex, national origin, disability, age, or any other classification protected by Federal, State or statutory law.

THDA has developed this Self Survey as a means of gathering information on sub-recipient compliance with Title VI and other applicable non-discrimination laws, which assists with state and Federal reporting and the planning of non-discrimination training and technical assistance. Each sub-recipient who has an active grant or contract with THDA must complete a Self-Survey **each year the contract is in effect** and submit the signed form to THDA **no later than July 31**.

THDA’s Self Survey must be completed even if a sub-recipient has completed a similar form with another state entity (such as the TN Department of Transportation or Department of Mental Health/Substance Abuse Services). The form is a fillable PDF, which may be completed with an electronic signature and emailed to civilrights@thda.org or printed, signed and mailed to, Civil Rights Compliance, THDA, 502 Deaderick St, Nashville, TN 37243. Questions or concerns about this Self Survey, THDA’s online training or other civil rights issues may be directed to civilrights@thda.org or 615-815-2127.

Please note: An employee of a contracted grant administrator may complete the Self Survey on behalf of a sub-recipient, but the Survey must be reviewed and signed by the responsible official for the sub-recipient or entity that signs the contract with THDA.

Sub-recipient/Grantee Information

Grantee/Sub-recipient Name Responsible Official Name & Title

Address (Inc. City, State, Zip & County) Telephone Number

Type of organization: Government Non-Profit Private entity

Title VI Coordinator Name (*required*) Title VI Coordinator Email (*required*)

Name & Title of Person Completing Survey

Organization Name for Person Completing the Survey (if different from the Grantee/Sub-recipient)

I. Grant Information

List the program name and total award amount for each THDA grant/contract that is currently active or administered by your organization (list grants with available funds even if funds were not drawn in the past fiscal year). Include the year your agency was originally awarded the grant (some contracts span multiple years). If a THDA grant is administered by a different entity, list the grant administrator's name. Attach a separate sheet if needed.

Program Name (i.e. HOME, LIHEAP, WAP, ESG, TN or Na Housing Trust Fund)	Total Award (\$)	Award Year	Grant sub contracted or administered by different entity? (Y or N)	Grant Administrator/ Sub-contractor Name

II. Demographics & Program Outreach

- Describe the organization's service area (city/counties served by the organization):
- Racial/ethnic composition of your service area. If you serve more than one county, please provide combined numbers/percentages for all counties you serve for each racial/ethnic category.

	Black/Af. American	White	Asian	Am. Indian/ Alaskan Native	Hawaiian/ Pacific Islander	Two or More Races	Hispanic/ Latino
#							
%							

- What is the number of **beneficiaries** by race/ethnicity in each THDA grant funded program (during the past year)? *Note: Please report beneficiaries from the most recent July 1 to June 30 period (state fiscal year), unless you routinely report for another recent time-period (i.e. Federal fiscal year).*

Program	Black/Af. American	White	Asian	Am. Indian/ Alaskan Native	Hawaiian/ Pacific Is.	2 or More Races	Hispanic/ Latino	Total

- When comparing your beneficiary race/ethnicity to the race/ethnicity of the overall population of the service area, are there disproportionately underserved groups? Yes No N/A *no beneficiaries during reporting period*
- HUD Housing Grantees only** (all other sub-recipients may skip to next section): If there are disproportionately underserved populations, have you decided to make changes to your marketing or outreach activities in the next fiscal year to try and attract underserved populations or those least likely to apply?

Yes No N/A- beneficiary population is representative of service area

N/A- no beneficiaries were served in past year or grant activity is single-family development with initial occupancy completed more than six months prior

Other (please explain):

III. Policies, Training & Compliance

1. Does the sub-recipient have a written policy statement assuring non-discrimination in all activities on the basis of race, color, sex, national origin, disability, age, or any other classification protected by Federal, State or statutory law? Yes No If NO, please explain why:
2. Do new employees receive non-discrimination training before providing services or engaging in decisions relating to THDA grant(s) activities? Yes No
3. Is non-discrimination training provided to all employees annually? Yes No
4. Which of the following non-discrimination laws or requirements are covered in employee training?

Title VI?	New Employee Training	Annual Training
Language Access?	New Employee Training	Annual Training
Section 504?	New Employee Training	Annual Training
Fair Housing?	New Employee Training	Annual Training
5. How many staff members, who engage in decisions relating to THDA grant(s) activities, completed non-discrimination training from July 1, 2023 to June 30, 2024? _____
6. If a grant administrator or sub-contractor manages THDA funded program activities on behalf of the sub-recipient, please describe briefly how non-discrimination obligations are disseminated to the sub-contractor and/or administrator and any compliance activities completed related to non-discrimination requirements. *Note: Entities who do not have an administrator may skip to the next section.*

How many employees of the grant administrator, who engage in decisions relating to THDA grant(s) activities, completed non-discrimination training from July 1, 2023 to June 30, 2024? _____

IV. Notices

1. Is a non-discrimination notice prominently displayed in areas/places accessible to the public (office lobby, website, etc.)? *Note: for sub-recipients with a housing related grant, the HUD Fair Housing poster must be prominently displayed.* Yes No If yes, where?
2. Are applicants and beneficiaries informed of their rights under applicable non-discrimination laws by methods other than public posting, such as: Written individual notice (brochure, etc.) Oral notice
Other method: N/A
4. How often are beneficiaries of THDA funded programs informed of their rights under applicable non-discrimination laws (check all that apply)? At initial receipt of services Annually Not informed
Other (explain):
5. Are applicants and beneficiaries notified of their rights under Section 504 of the Rehabilitation Act, and the process to request a reasonable accommodation? Yes No
6. Do posters, brochures and/or other non-discrimination materials include the contact information for your Title VI/non-discrimination Coordinator? Yes No
7. Does the sub-recipient include in all solicitations for bids of work or materials a notice of non-discrimination and a notice that contracts or agreements are subject to Title VI of the Civil Rights Act of 1964 and other nondiscrimination laws? Yes No N/A

V. Limited English Proficiency (LEP)

1. Has your organization completed a four-factor analysis to assess the need for language assistance services?
Yes No
2. Does your organization have a Language Access Plan? Yes No
3. Does your organization have written policies and procedures for the language services offered to LEP persons and how the services will be delivered? Yes No If NO, please explain:
4. Are applicants and beneficiaries notified of the right to free language assistance? Yes No
If NO, please explain:
5. Does your organization provide free interpretation services (oral) to LEP persons? Yes No
6. Please provide the number of language encounters or requests for language assistance in the reporting period:
Attach a separate sheet if needed or desired.

# of Requests/ Encounters*	Language/Language Group (e.g. Spanish)	# of Encounters where Qualified Interpreter was Provided by Sub-recipient (over the phone, etc.)

**Include the number of cases where the organization provided a qualified interpreter and cases where an applicant/beneficiary provided their own interpreter. All encounters where an individual requires language interpretation must be reported.*

7. Are any of the following readily available in languages other than English (check all that apply)? Vital program documents Program brochures Posters or Advertisements N/A

**Note: For housing programs, HUD provides a number of standard documents and brochures in non-English languages at: https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep*

VI. Discrimination Complaints

1. How does the sub-recipient notify applicants and beneficiaries of their right to file a complaint alleging discrimination (i.e. written notice given to all beneficiaries, HUD poster, etc.)?
2. Number of discrimination complaints (Title VI, Fair Housing, Section 504) filed that name the sub-recipient entity during the survey period:
**If at least one complaint was received during survey period, please attach a log to the survey with the complaint date, complainant name & contact information, nature of the complaint, disposition.*
3. Did the sub-recipient entity notify THDA of all complaints of discrimination at the time of receipt by the agency (within ten business days)? Yes No n/a (no complaints in reporting period)
4. Number of complaint(s) filed with state or federal jurisdictional agency (THRC, HUD, HHS, DOE) in the past year alleging discrimination by the sub-recipient entity:
5. Number of lawsuit(s) filed alleging discrimination by the sub-recipient entity in the past 3 years:
**Attach additional pages to explain the nature of any complaint(s) or lawsuit(s); date filed and the outcome.*

6. Governing & Advisory Boards

1. List the number of individuals who currently serve on a Governing Board for the sub-recipient by race/ethnicity/gender. *For local governments, this does not include the County Commission or City Council.*
Check this box if your organization does not have a Board of Directors.

Board	White	African American	Asian	Other Race	Hispanic	Male	Female	Total Members
Board of Directors								

**Note: "Other" may include beneficiaries who are Am. Indian, Alaska or Hawaiian Natives, Pacific Islander, two or more races, other races and those who fail to disclose a race.*

2. What is the term length for Board of Directors membership?
3. How are members of the Board of Directors selected?
4. List the number of individuals by race/ethnicity/gender who currently serve on an Advisory Board(s) for the sub-recipient that contribute to decisions on the administration of THDA grants.

Check this box if your organization does not have any Advisory Boards.

Advisory Board Name	White	African American	Asian	Other Race	Hispanic	Male	Female	Total Members

**Note: "Other" may include beneficiaries who are Am. Indian, Alaska or Hawaiian Natives, Pacific Islander, two or more races, other races and those who fail to disclose a race.*

5. What is the term length for Advisory Board membership?
6. How are members of the Advisory Board selected?
7. Does the sub-recipient's Governing Body and/or any Advisory Board(s) reflect the demographic diversity of the geographic service area? Yes No
8. If Board members, who contribute to decisions on the administration of THDA grants, do not reflect the demographic diversity of the service area, is the organization taking steps to achieve greater diversity on the Board(s)? Please describe:

VIII. Signature of Responsible Official

I declare that to the best of my knowledge and belief, all of the information contained within this Non-discrimination Self Survey is true, complete and correct.

Signature*

Print Name

Sub-recipient/Grantee Name

Date (mm/dd/yy)

**If a grant administrator for a city, county or other sub-recipient entity completes the form, the responsible official for the sub-recipient entity (i.e. city/county, etc.) should review and sign the form prior to submission.*